

August 13, 2013



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**RE: PNWA Comment on 2013 FCRPS BiOp Draft Comprehensive Evaluation**

The Pacific Northwest Waterways Association (PNWA) appreciates the opportunity to comment on the Draft Comprehensive Evaluation Report that examines the past efforts of the Federal government to develop and implement a successful fish survival improvement program in the Columbia Snake River System.

PNWA is a non-profit trade association that advocates for federal policies and funding in support of regional economic development. We represent over 130 public and private sector member organizations in Oregon, Washington, Idaho, and California. Members include public ports, navigation, transportation, trade, tourism, agriculture, forest products, energy and local government interests. Since our founding in 1934, PNWA led the way for development of economic infrastructure for navigation, electric power and irrigated agriculture on the Columbia and Snake River System. In 1971, we expanded, adding Oregon and Washington coastal port members to provide a comprehensive regional perspective. Today, PNWA works with the U.S. Congress, federal agencies and regional decision leaders on transportation, trade, energy and environmental policies and projects to enhance economic vitality in the Pacific Northwest.

PNWA members include ports, towboat companies, grain businesses, and others involved with economic development of our Columbia Snake River System, our coastal and Puget Sound ports—and many businesses linked to these operations. Ports are significant economic engines in their communities, providing opportunities for family-wage jobs to be created and maintained in both smaller towns and major cities. These efforts are an element in helping these communities prosper and grow.

[www.pnwa.net](http://www.pnwa.net)

PNWA is in its 79th year of advocacy for multiple uses and development of the FCRPS. Our long history includes advocacy for the dams now in place on the Columbia River/Snake system and covered by this BiOp, and for broader economic development throughout the Northwest states. We support a robust Corps of Engineers budget which allows both maintenance of and improvements to our existing water infrastructure, as well as its fish-related budget. PNWA has participated in salmon survival improvements efforts since the Power Act was debated and enacted. PNWA participated in the original “Salmon Summit” in the early 1990s that predated most regional salmon ESA listings. PNWA as an organization, and all of our members, support balanced salmon recovery programs.

PNWA believes the Comprehensive Evaluation Report (CE) provides a positive mid-point report on the successes and inherent challenges in implementing and expanding a broad range of actions to improve fish survival, spread across the many elements of an All-H program. PNWA believes that only an all-H effort will succeed, and will sustain support from the region’s ratepayers and our Northwest Congressional delegation.

This BiOp and its All-H fish programs are among the most expensive and comprehensive of any such plan developed in response to an ESA listing or multiple listings. We believe it is succeeding, in large part, because the region supports a balanced All-H approach that improves survival of the listed fish while maintaining the multiple authorized uses of the river system.

In addition, a subset of PNWA, the Inland Ports and Navigation Group (IPNG), has been an active participant in the BiOp litigation as an intervenor to protect and defend navigation and to see that an All-H survival improvement program is carried out. We believe that one reason that the CE shows such progress is that active litigation has paused, such that Federal action agencies and others have been able to focus their time and resources where they should be: in the field. We call attention to actions in the estuary in restoring habitat. PNWA supports, for example, culvert replacement, and is pleased with reports of progress and positive impact from such programs.

As noted above, PNWA believes that the Draft CE offers a positive report at the mid-way point of the current BiOp. Navigation elements have been part of the “Hydro “H”, which has had a prominent role in the early years of strengthening salmon survival improvements. We now are pleased to see an increased focus on Habitat efforts, which we believe is a critical element, particularly in the estuary.

PNWA has examined RPA Action 5- Lower Columbia and Snake River Operations in particular, as steps described there included elements of potential direct impact on navigation. Operation of the Run-of-River and John Day projects was described, as was reliance on the Adaptive Management Implementation Plan (AMIP) processes regarding project operations. Navigation interests believe that the Federal government implemented this RPA appropriately, and it stands as an example of the AMIP operating as it was intended.

The Action Agencies have faced difficult operational choices as plans and programs have been implemented. While there have been hiccups, we believe that some were caused by the complexities of initiating and coordinating such a complex set of actions. The Draft CE not only reminds our region of the importance of the overall goals, but a careful examination also shows everyone concerned with salmon survival improvements just how difficult it was to

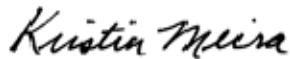
develop and implement this complex web of RPAs. “For every action there is a reaction” is a cliché, but reading the draft CE drives home this point, reminding readers much effort was made by the Action Agencies and others to remove or minimize potential adverse reactions to proposed RPAs.

We also note that the CE contains an update to the earlier study about breaching Lower Snake River Dams. We question the value in diverting funds and staff from field work to meet the BiOp survival improvements targets, and redirecting them to preparation of the dam breaching Plan of Study. While we question whether this was a worthwhile transfer of money and staff, we understand that it was required. In the Plan of Study, we believe that the Corps raised some issues that we recall as problems during the disastrous test drawdown that occurred in 1992.

PNWA applauds the professional work by the Federal government, particularly the action agencies, in developing this mid-term Comprehensive Evaluation. It provides a useful review and evaluation of progress from the many action steps and the expected survival improvements from these actions. It provides the region with a status update on the fish. And, importantly, it examines the different adaptive management strategies known as AMIP.

PNWA thanks the Action agencies for this opportunity to comment on this draft.

Sincerely,



*Kristin Meira*

Kristin Meira  
Executive Director  
Pacific Northwest Waterways Association

Attachment: PNWA membership listing

cc: Lorri Bodi, Bonneville Power Administration  
Sarah McNary, Bonneville Power Administration  
David Ponganis, U.S. Army Corps of Engineers  
Rock Peters, U.S. Army Corps of Engineers  
Kate Puckett, Bureau of Reclamation

# PNWA Membership Roster



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