

September 23, 2013



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RE: PNWA Comment on 2013 FCRPS Draft 2014-2018 Implementation Plan

PNWA welcomes the opportunity to provide comments on the draft 2014-2018 Implementation Plan (IP). We provide below our focused comments on several elements of the Hydropower section of specific interest to navigation.

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.

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.

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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.

The Columbia Snake River System is the largest wheat export gateway in the United States, and second in the nation for soy. The river system is tops on the West Coast for wood exports and mineral bulk exports. Over 42 million tons of international trade moved on this waterway in 2010, valued at over \$20 billion. A conservative estimate of the jobs directly tied to the deep draft navigation channel finds that 40,000 rely on this waterway for their livelihood. This waterway is a significant national asset, and should be evaluated thoroughly for any potential changes which may impact its efficiency to move cargo up and down the navigation system safely and cost-effectively, and with the most benign environmental footprint of any transportation alternative (rail or truck).

Substantial federal investments have been made in both the deep draft Lower Columbia River as well as the inland barging channel and locks. The most recent examples include the Columbia River channel deepening project Columbia River jetty repairs, and three new downstream lock gates. A major rehabilitation of the Columbia River jetties is on the horizon, along with additional lock investments and ongoing annual maintenance dredging on the Lower Columbia and at the Mouth of the Columbia.

As an association, we have been involved in finding and supporting broad-based solutions to fish recovery in the Columbia Snake basin that protects multiple uses of the river while implementing practical solutions (RPAs) supported by sound science, and applied throughout the region as part of an “All-H” fish assistance program under a FCRPS BiOp.

We often have noted that salmon runs declined due to a variety of conditions summarized as “Four Hs”, plus the demands put on all of our natural resources as human populations have increased throughout the basin. The Federal agencies have focused on Hydro, Habitat, Hatchery and Harvest, and PNWA is committed to an all-H recovery that draws on improvements to each of these areas. PNWA often adds a fifth and sixth H-- Humans and the High Seas. Human impacts far away from Hydro projects, or any other H play a role in the decline of fish runs. Also, our region now is learning more about the life and survival of fish in the ocean. We applaud the increased research now underway. PNWA believes that still more research into causes for fish mortality in the ocean is needed.

In addition to direct involvement of PNWA and its members in regional salmon conversations, a subset of PNWA members comprise the Inland Ports and Navigation Group (IPNG). IPNG is a defendant intervener in the FCRPS BiOp law suit, supporting the work of the federal agencies, and the states and tribes who are collaborating with the agencies to produce the new BiOp by the end of 2013.

DRAFT IMPLEMENTATION PLAN

We will reserve more general comments and observations until we submit our views about the recently released 2014-2018 Draft Biological Opinion. In these comments, we will focus on specific sections addressing navigation issues in the RPAs, and some general observations about issues raised in the Draft IP.

The key sections impacting navigation fall under Hydropower Strategy 1, RPA 5 on pages 8-9 of the Draft IP.

Operating Most Reservoirs at Normal Operating Range

From 2014 through 2018, the draft IP notes Snake River navigation pool operations will be set at MOP “with a 1-foot operating range from April 3 to approximately September 1 as described in the annual WMP-Water Management Plan. Operations outside this range during this period will be coordinated

with the appropriate agencies (Corps' Reservoir Control Center [RCC] and the TMT) using procedures described within each annual WMP (Water Management Plan) available at <http://www.nwd-wc.usace.army.mil/tmt>."

We understand that this has been the past policy, and that the Federal agencies plan to continue it. We support this, and endorse maintaining maximum flexibility for needed operational changes due to safety or efficient cargo movements. The Columbia River Towboat Association (CRTA) has led these discussions with the appropriate officials in the TMT, and we salute the professionalism shown by the agencies as alternatives have been reviewed and implemented.

Lower Granite Pool Depth, PSMP and Dredging

The "Adaptive Management" element under this same RPA details steps taken to respond to changes in operations that arose during the past years of the BiOp as the navigation channel experienced sedimentation that threatened safety and the ability to serve docks at ports in the Lower Granite pool. As the discussion in the Draft IP (pages 8-9) notes: "Since 2011, the Lower Granite Pool has been operated from MOP up to MOP +2 ft., depending on river flow (variable MOP). This operation was implemented to provide additional depth and ensure safe navigation near the confluence of the Clearwater and lower Snake Rivers where considerable silting has accumulated in the navigation channel. The Corps has developed a draft Programmatic Sediment Management Plan and a draft Environmental Impact Statement (EIS). It is anticipated that a Record of Decision will be issued in 2013. The Draft Plan and EIS include alternatives that implement maintenance dredging in the near term. If maintenance dredging occurs, the Lower Granite Pool will return to a MOP operation during the fish passage season."

Until maintenance dredging takes place, it is essential that maximum flexibility be maintained to allow safe operation of navigation in the Lower Granite pool. We are told that, at MOP, some areas now are only ten feet deep. Operating the pool above MOP is essential to maintaining service to the docks in the pool, and will be necessary until dredging takes place. This part of the river has not been dredged since the winter of 2005-2006.

John Day at Minimum Irrigation Pool (MIP) Level

Another important section of Hydropower Strategy 1, RPA 5, states that John Day will be operated at a level equal to minimum level at which irrigation can continue - which we call MIP. Operating outside the normal minimum would be addressed by the Corps' RCC and the TMT.

The John Day pool has been operated at an elevation between 262.5 and 264, and the RPA will continue that operation plan. PNWA supports this strongly, and we oppose any changes which would require lowering the pool to MOP or below.

Although the preceding comments are at the core of our concerns, other elements also are important to navigation interests. They appear in the IP under Hydro Strategy 1.

Hydropower Strategy 1, RPA-8, Operational Emergencies

This RPA addresses Operational Emergencies and Fish Emergencies, if they occur. The Operational Emergencies list of potential elements includes navigation along with "power system, flood control, dam safety and other emergencies." Based on our long experience with the Corps and Bonneville officials, we believe that operational emergencies involving navigation will be addressed with a timely response that recognizes the adverse impacts that rapidly develop for cargo shipping throughout the Columbia Snake navigation channel. While both the Generation Emergencies Action Plan and the Transmission Emergency Action Plans have specific Emergency Protocols in place, we trust that the

absence of any equivalent plan to address and resolve navigation-based emergencies in the future will not hinder responses to resolve them as soon as possible after reporting.

Hydro Strategy 1, RPA 15, Total Dissolved Gas (TDG) and Water Temperature

This RPA discusses TDG and Water Temperature in the Columbia and Snake rivers. We see that the "Operation of lower Snake River projects at MOP" section refers back to RPA 5 for specifics. We agree that navigation can be impacted from actions taken to respond to TDG and Water Temperature concerns, where those actions may create a ripple effect that could impact navigation safety. PNWA welcomes this recognition of the potential to impact cargo shipments and access to berths.

From a broader perspective, not addressed in a specific RPA, PNWA is also concerned about the ability to safely and efficiently navigate barge tows during periods of higher flows that could occur more frequently. These flows could hinder safe navigation, as well as the efficiency of barging in the federal navigation channel. This concern has been highlighted in PNWA comments on the working draft Regional Recommendation for the Columbia River Treaty. Higher flows for longer periods of time will impact the ability of barge operators to move full tows, which in turn impacts shipments of Northwest agricultural products, petroleum, and all other cargo handled on the Columbia Snake River System.

In conclusion, PNWA appreciates the tremendous effort made by the Federal agencies in this draft Implementation Plan. PNWA is aware of the countless meetings, in collaboration with other sovereigns, to address the very complex issues addressed by each RPA. Overall, we believe that the Draft Implementation Plan addresses the concerns raised by Judge Redden in his order, and provides a framework for a stronger FCRPS BiOp to guide the region through the next phase environmentally responsible river operations.

Sincerely,



Kristin Meira
Executive Director
Pacific Northwest Waterways Association (PNWA)