



755 Winslow Way East  
Suite 105B  
Bainbridge Island, WA 98110

PHONE: 203.980.3051  
EMAIL: [ccostanzo@americanwaterways.com](mailto:ccostanzo@americanwaterways.com)

Charles P. Costanzo  
General Counsel & Vice President – Pacific Region

August 20, 2020

Mr. Andrew Wheeler  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

RE: Total Maximum Daily Load for  
Temperature in the Columbia and  
Lower Snake Rivers

Dear Administrator Wheeler:

The U.S. tugboat, towboat, and barge industry is a vital segment of America's transportation system. The industry safely and efficiently moves more than 760 million tons of cargo each year, including more than 60 percent of U.S. export grain, energy sources, and other bulk commodities that are the building blocks of the U.S. economy. The fleet consists of nearly 5,500 tugboats and towboats and over 31,000 barges. These vessels transit 25,000 miles of inland and intracoastal waterways; the Great Lakes; and the Atlantic, Pacific, and Gulf coasts. Tugboats also provide essential services including ship docking, tanker escort, and bunkering in ports and harbors around the country.

AWO members operate tugboats and barges on the Columbia-Snake River System (CSRS) engaging in barge transportation of commodities and providing critical ship assist and marine services for deep-draft vessels calling the lower river. The CSRS is responsible for the movement of \$21 billion in agricultural products annually. It is the number one gateway for U.S. wheat exports and second only to the Mississippi River in corn and soy exports. It is also the most important waterway for West Coast wood, energy, and mineral exports and is a critical port of entry for automobile imports and exports. Each typical four-barge tow on the river removes 538 trucks from our nation's highways, reducing pollution, congestion, and traffic fatalities. Towing vessels provide significant environmental, economic, and social benefits in moving bulk commodities. Towing vessels have low energy demands and are nearly 40 percent more fuel-efficient than freight trains and 270 percent more fuel efficient than semi-trucks.

August 20, 2020

Page 2

Eliminating CSRS barge transportation would increase diesel fuel consumption by nearly five million gallons per year, generating 1,251,000 tons of carbon emissions from additional rail cars and trucks. Additional road traffic – if added to regional highways – would increase air emissions, traffic fatalities and add costly congestion. Agricultural producers in the region rely on all modes of freight transportation to move commodities to global markets. Between 50 and 60 million tons of cargo are transported annually on the CSRS, a system that has significantly lower infrastructure costs than other modes.

AWO recognizes the importance of the careful development of the TDML to ensure long-term river health and to protect the many vital authorized uses of the CSRS. AWO acknowledges the impacts of CSRS rising temperatures and urges EPA to consider the environmental benefits of navigation as it develops the TDML.

AWO is concerned that the TDML, if improperly developed, could prioritize certain authorized uses like fish and wildlife habitat over other equally important authorized uses like navigation and contribute to growing pressures to breach dams and navigation locks on the system. Specifically, interest groups may try to leverage the TDML to call for the breaching of CSRS dams on the grounds that dam breaching is the only way to restore lower river temperatures and recover endangered salmon species. AWO contends that barging on the river is a vital tool in reducing emission and greenhouse gas impacts of freight transportation and must be carefully considered as EPA develops its TDML. **AWO is concerned that without careful consideration of all federally authorized uses, the TMDL could threaten the viability of environmentally beneficial navigation on the CSRS.**

Recognizing the impacts that the TMDL will have on Congressionally authorized uses of the CSRS, it is imperative that EPA remains highly sensitive to impacts on navigation. AWO encourages EPA to carefully consider Northwest River Partners comments suggesting that EPA must consider temperatures from non-impounded rivers and water flowing from Canada to establish an accurate TMDL model. AWO requests that EPA reissue a revised draft TMDL and provide stakeholders with the opportunity to provide comments before the draft is finalized.

Thank you for the opportunity to comment on the TMDL. AWO appreciates the opportunity to work with EPA and other CSRS stakeholders on this vital issue.

Sincerely,



Charles. P. Costanzo  
General Counsel & Vice President – Pacific Region