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BG D. Peter Helmlinger, P.E.
Commander, Northwestern Division
U.S. Army Corps of Engineers

Ms. Lorri Gray
Director, Columbia-Pacific Northwest Region
Bureau of Reclamation
U.S. Department of the Interior

Mr. Elliot Mainzer
Administrator and CEO
Bonneville Power Administration
U.S. Department of Energy

Re: Docket ID No. ER-FRL-9049-6
Columbia Snake River Operations
Draft Environmental Impact
Statement

Dear General Helmlinger, Ms. Gray, and Mr. Mainzer:

On behalf of The American Waterways Operators, the national trade association for the tugboat, towboat, and barge industry, thank you for the opportunity to comment on the Columbia Snake River Operations Draft Environmental Impact Statement (DEIS).

AWO members are active in virtually all aspects of commercial navigation on the Columbia-Snake River System (CSRS). AWO members move agricultural products for export, energy cargoes for use in the basin, and shipdocking, tanker escort and bunkering at deep-draft ports on the Columbia River. In all, towing vessels help move tens of millions of tons of cargo every year on the CSRS, reducing congestion on highways and railroads while producing fewer pollutants than trucks and trains.

AWO Supports the Preferred Alternative

AWO agrees that the preferred alternative put forth in the DEIS is the best option for ongoing system management and strikes the optimal balance between various stakeholder interests. We

also appreciate the acknowledgement of the devastating impacts that MO3 – breaching the four Lower Snake River dams – would have on commercial navigation and the nation’s environmental and economic future.

Barge operators that serve the CSRS rely on the four Columbia River locks and the four Snake River locks to navigate the entire 465-mile long inland waterway from Astoria, Oregon to Lewiston, Idaho. These operations provide environmental and safety benefits to the Pacific Northwest by providing safer, less expensive, and more fuel-efficient alternatives to trucks and rail.

AWO agrees that the preferred alternative allows for the most efficient use of the river system to aid in fish recovery. A plan that allows for flexible spill operations to accommodate fish passage during times of high- and low-power generation provides a viable path for endangered species recovery without eliminating hydropower or navigation benefits.

Benefits of Marine Freight Transportation on the CSRS

Marine freight transportation on the CSRS provides clear and obvious benefits to the Pacific Northwest and the country. Towing vessels offer substantial benefits over trucks and trains to move bulk agricultural and energy 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. Removing the Snake River dams would eliminate barge transportation on the river and 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.

Marine freight transportation on the CSRS presents human health and environmental benefits beyond reduced air emissions. It would require about 150,000 trucks to move the cargo that is barged on the Snake River in a typical year. This additional road traffic, if added to the regional highway system, would increase safety hazards for motorists and increase road traffic.

Snake River dam breaching would also necessitate over \$1.1 billion in capital investments to accommodate the transfer of the existing maritime freight tonnage to rail or road. Highway, rail, and grain elevator networks would need hundreds of miles of shortline rail track rehabilitation; new rail construction; and major highway improvements not to mention ongoing road maintenance. Agricultural producers in the region rely on all modes of freight transportation to get their goods to global markets, and marine freight is a vital part of the system. Between 50 and 60 million tons of cargo is transported annually through the CSRS and the costs of marine infrastructure development and maintenance are significantly lower than terrestrial modal infrastructure. If the Snake River dams were breached, the surrounding agricultural community would not only bear the additional infrastructure costs but would also lose its lowest-cost path to global markets.

Existing Collaboration Among Public and Private Entities that Aid in Fish Recovery

Responsible stewardship of the CSRS must remain an ongoing collaborative effort between stakeholder groups, states, communities and tribes in the region, and the federal government. In the last several years, major environmental improvements have been made with fish ladders, dam design, optimized river flow, and habitat restoration, resulting in steady improvements to salmon runs. These improvements have led to a juvenile fish survival rate between 95% and 98% past each of the eight federal dams on the system.

AWO members in the region have long sought to capitalize on the inherent environmental advantages of the towing industry to support the recovery of salmon populations. Our member companies have and will continue to collaborate with the Army Corps of Engineers to transport salmon through the dams to ensure higher survival rates. The towing industry also routinely works with regulators to balance the needs of navigation and fish passage by ensuring that transportation projects consider fish health impacts and preserve habitation and spawning areas.

Thank you for the opportunity to comment on the Columbia Snake River System Operations Draft Environmental Impact Statement. AWO strongly supports the preferred alternative and thank the agencies for their complete, professional, and thoughtful work. Please feel free to contact AWO with any questions or further information.

Sincerely,



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