



DEPARTMENT OF ECOLOGY
DEC 14 2018
WATER QUALITY PROGRAM

December 10, 2018

Becca Conklin
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: Draft Environmental Impact Statement – Columbia and Snake Rivers
SEPA No. 20806404

Dear Ms. Conklin:

Thank you for the opportunity to provide comments on the scope of the Draft Environmental Impact Statement – Columbia and Snake Rivers (“DEIS”). These comments are submitted on behalf of Tidewater Transportation and Terminals (“Tidewater”), which is headquartered in Vancouver, Washington.

Tidewater has been in business since 1932 and operates a fleet of tugboats, barges and several marine terminals on the Columbia and Snake Rivers. Tidewater has over 280 employees and is the largest inland marine transportation company west of the Mississippi River. Its vessels safely move millions of tons of freight every year on the commercially navigable 465 miles of the Columbia and Snake Rivers, reducing congestion and wear and tear on the state’s highways and railroads while producing far fewer pollutants and carbon emissions than trucks and trains transporting equivalent tonnage.

Tidewater has always strongly supported robust salmon recovery efforts, including improvements to hydro, habitat, harvest and hatchery concerns. That being said, we are very concerned with the State of Washington’s proposed DEIS for the following reasons:

First, we believe the State of Washington’s DEIS is duplicative of the Columbia River Systems Operations Environmental Impact Statement (“CRSO EIS”) process that is already two years underway by the federal agencies. The CRSO EIS is a regional, comprehensive effort to evaluate a range of operational alternatives for the federal hydropower facilities, including spill levels, that exist along the Columbia and Snake Rivers. The CRSO EIS process includes multiple opportunities for public engagement. The State of Washington is already a cooperating agency in this process, which will include an evaluation of the Columbia and Snake Rivers. Furthermore, the result of DEIS effort will not be as comprehensive as the current federal effort, and it is unlikely the DEIS effort will yield new information that would inform the CRSO EIS process or other species recovery activities in the Pacific Northwest.

A handwritten signature in black ink, appearing to be the initials 'BC' or similar, located at the bottom right of the page.

Second, the DEIS is not necessary as the perceived need to adjust the total dissolved gas ("TDG") levels in the Columbia and Snake River Dams are contrary to sound science. These projects are already among the most advanced, fish-friendly projects in the entire country. For example, the juvenile fish survival rates past the Snake River Dams averages 97%. Major improvements in turbine design, optimized river flow, fish ladders, and habitat restoration have resulted in improvements to salmon returns. Please see the enclosed Snake River Dams Fact Sheet for more information.

Tidewater urges the State of Washington to forgo conducting the DEIS and continue its participation in the existing CRSO EIS process.

Thank you for your time.

Sincerely,



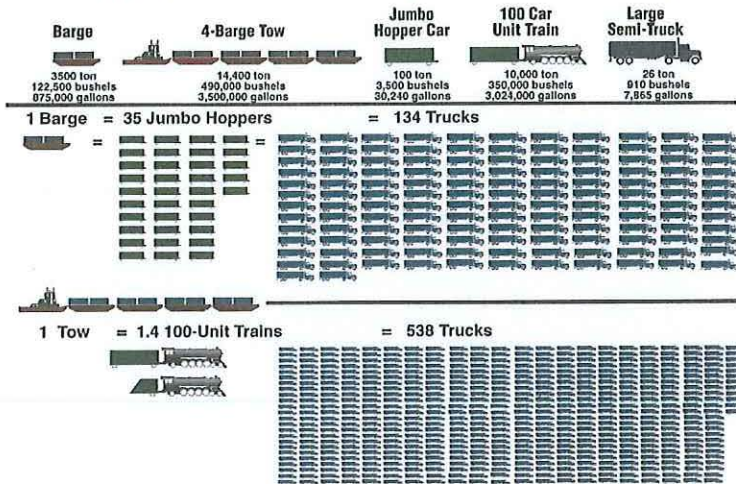
Robert A. Curcio
President & CEO

12/10/18

Enclosure (1)

Snake River Dams

Freight Comparison of Barges, Trains and Trucks



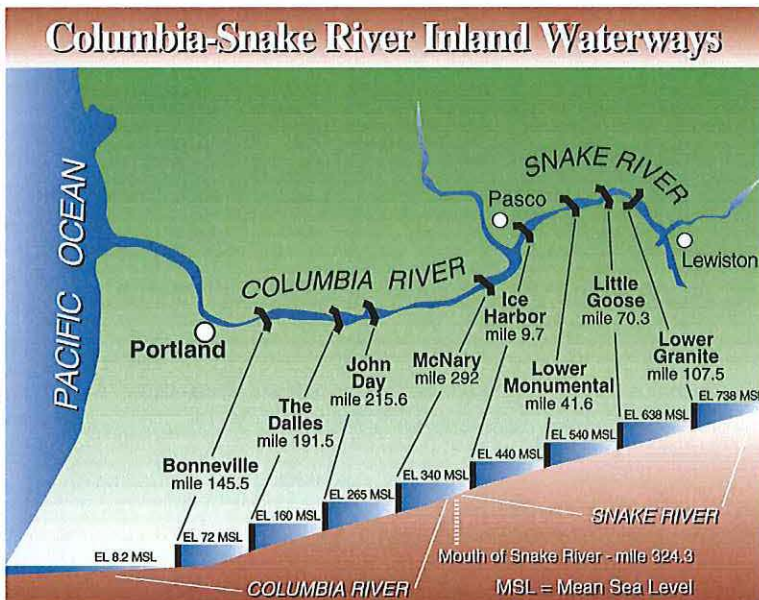
Barging is the most efficient and environmentally friendly mode of cargo transportation

In 2014, it would have taken 43,610 rail cars or 174,440 semi-trucks to move the cargo that went by barge on the Snake

The Columbia Snake River System is a 465-mile commercial waterway that provides farmers as far as the Midwest access to international markets



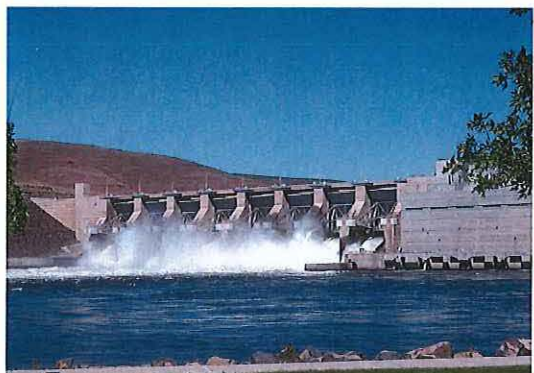
The Columbia Snake River System is the top wheat export gateway in the U.S.



In 2014, nearly 10% of all U.S. wheat exports moved through the Snake River dams

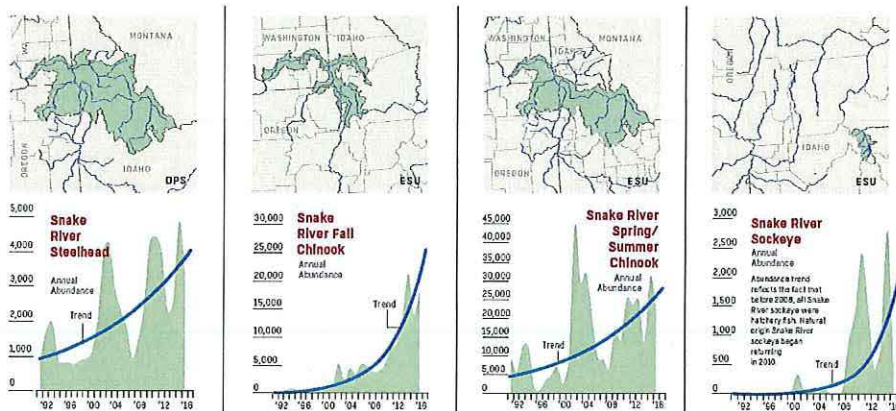
Barging information courtesy of Texas Transportation Institute
Wheat information courtesy of U.S. Department of Agriculture and U.S. Army Corps of Engineers

Snake River Dams



The four Snake River dams provide enough clean energy to power 1.87 million homes

Dam investments have resulted in improved fish returns and a 25 year sustained increase in salmon populations



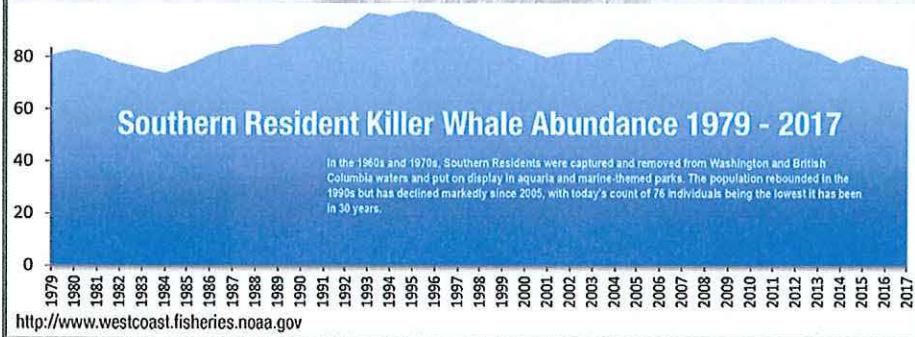
Spotlight on Orcas

The three Southern Resident Killer Whale (SRKW) orca pods have declined since the 1800s

In the 1960s, 47 SRKW orcas were captured for aquarium display, leaving only 67 remaining

Snake and Columbia River Chinook stocks have rebounded, yet orcas continue to decline

Recent NOAA research has highlighted Northern and Southern Puget Sound Chinook as priority orca prey stocks



Juvenile fish survival rates past each of the eight federal dams are between 95% and 98%



Between 2002 and 2011, average wild Chinook salmon populations more than tripled, and average wild steelhead populations doubled