

Columbia River Treaty Review
Stakeholder Responses to U.S. Entity Solicitation
Response Summary: March 5, 2013

	Hydropower	Flood Control	Ecosystem	Other
Western Montana G&T	<p>The Canadian Entitlement should not exceed more than one half of the actual power benefit achieved through coordinated operations.</p> <p>Current Canadian Entitlement is worth ten percent its value. State Department should correct this inequity.</p>	<p>Flood control payments are responsibility of U.S. taxpayers, not electric ratepayers.</p>	<p>Important; progress is being made through other programs, such as Biop, fish accords and Northwest Public Power and Conservation Council fish and wildlife programs.</p>	<p>Montana G&T's order of priority is hydro power, flood control then ecosystem.</p> <p>Termination notice may be necessary to correct overpayment of Canadian Entitlement.</p>
Seattle City Light	<p>Further degradation of power generation capability must be matched with measurable improvements in ESA-listed species.</p>	<p>Flood control payments are responsibility of U.S. taxpayers.</p>	<p>Ecosystem improvements need commitment and funding from both sides of the border. Maintenance and improvement of water quality is critical.</p>	<p>Terminate the Treaty. It is a necessary precursor to negotiating a comprehensive, basin-wide replacement treaty that better meets region's needs.</p> <p>It must consider various costs and benefits representing interests of all parties -- including Canadians -- in balanced discussions.</p> <p>Maintenance of navigation is critical. Climate change is essential component of modeling.</p>

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PNGC	<p>Canadian Entitlement is overvalued due to significantly changed operating conditions, fish requirements and electricity market conditions in particular.</p> <p>Annual revenues back to the U.S. could total \$180 million annually if the Entitlement is terminated.</p> <p>Hydropower is non-carbon.</p>	<p>Flood control payments are responsibility of U.S. taxpayers, not electricity ratepayers of the Northwest.</p>	<p>Value science based and cost-effective approach used in existing Federal Columbia River Power System management, especially when studying return to a more normal hydrograph, increasing flood risk to benefit fish and wildlife and exploring fish passage beyond Grand Coulee Dam.</p>	<p>Recommend terminate Treaty.</p> <p>Any climate change and mitigation conversations should be balanced with the environmental attributes of hydro power.</p>
Chelan County	<p>Entitlement should not exceed one half of actual incremental benefit of coordinated operation.</p> <p>Canadian Entitlement payment today is ten-fold higher than actual value. Chelan PUD shares in the Mid-Columbia PUD's 27.5 percent of the entitlement delivery.</p>	<p>Flood control payments are responsibility of U.S. taxpayers, and should be consistent with the approach used throughout the U.S.</p>	<p>Existing robust environmental mitigation plans should not be enhanced by the reallocation of Entitlement funds saved by new calculation of actual downstream benefits.</p>	<p>Support principles from power group. If not met, termination may be necessary.</p> <p>Priority order of issues is: 1) Downstream power benefits; 2) flood control; and 3) environmental mitigation.</p>

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Power Group	<p>Principle: Any payment made to Canada for downstream benefits should not exceed one-half the actual incremental benefit achieved through a coordinated US/Canada operation as compared to a non-coordinated operation.</p> <p>Primary purpose of the Treaty has been fulfilled; financed by U.S. to build storage in Canada.</p>	<p>Principle: Consistent with the flood control funding approach employed throughout the U.S., any payments for Columbia River flood control should be the responsibility of the taxpayers of the U.S.</p>	<p>Principle: Each of the entities providing Canadian Entitlement return already have robust environmental mitigation plans embedded in their project authorizations and developed in legal forums. Along with the cost of Canadian Entitlement return, this mitigation is funded by utility customers. Therefore, an equitable correction to the Entitlement should not lead to an increased mitigation requirement.</p>	<p>Termination notice necessary if these principles cannot be met.</p> <p>These principles were signed by 24 electric utilities and utility groups in the Northwest, representing 6.4 million U.S. electric customers.</p>

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PPC	<p>Entitlement should not exceed one half of actual incremental benefit of coordinated operation.</p> <p>Existing Canadian Entitlement provisions are a serious concern to U.S. residents due to lack of balance in benefits. Currently, the cost is borne by ratepayers in the Northwest.</p> <p>Investments in Canadian dams will be fully complete by 2024.</p>	<p>Flood control payments are responsibility of U.S. taxpayers. Imposing costs on electricity rates is inconsistent with practices elsewhere and would be a detrimental to preserving regional jobs.</p> <p>Concerns with higher flows under analysis in Treaty Review that are dangerous and extreme. Higher flows could pose greater flood risk and have no place in Treaty discussions.</p>	<p>Reintroduction of fish passage is outside Treaty scope. Utility customers already fund environmental mitigation; Treaty should not be viewed as opportunity to increase cost of mitigation being pursued elsewhere.</p>	<p>Would appreciate having a larger role in Treaty Review; wants federal treaty negotiators to focus on objective analysis.</p> <p>PPC represents over 100 Northwest utilities.</p>
Douglas County	<p>Entitlement should not exceed one half of actual incremental benefit of coordinated operation.</p> <p>Douglas shares in the Mid-Columbia PUD's 27.5 percent of the entitlement delivery.</p> <p>Electric customers should not be expected to pay for an unrealized theoretical benefit or any other added costs beyond the earliest moment such payment can cease.</p>	<p>Flood control payments are responsibility of U.S. taxpayers.</p>	<p>Equitable correction to Entitlement should not lead to increase in mitigation requirements (plans are in place).</p>	<p>Douglas is not confident that the first principle of the Power Group can be met without the termination contemplated by Article XIX of the Treaty.</p>

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Clark Public Utilities	<p>By terminating Treaty power provisions, U.S. would realize equivalent of two hydropower projects the size of Lower Granite Dam if the power was returned to U.S. control.</p> <p>Current delivery of benefits to Canada without considering non-power obligations of the U.S. is untenable and unfair. Original forecasts for the Canadian Entitlement have not come about, and are actually harmful to U.S. ratepayers.</p>	<p>Confidence in U.S. Entity to keep flood risk at forefront of all Treaty discussions.</p> <p>Treaty authors separated power from flood control so that the power aspect could be terminated while flood control continues.</p>	<p>U.S. Entity should not take any action that would jeopardize any downstream project from meeting present non-power requirements.</p> <p>U.S. Entity should not consider Treaty process as a means to negotiate additional non-power requirements.</p>	<p>Immediately exercise termination option to hit the “reset” button on downstream power benefits and Canadian Entitlement calculations; they are not aligned with present-day realities.</p> <p>Clark PUD encourages engagement of Northwest Power and Conservation Council and PNUCC in this process and supports Power Group’s principles.</p> <p>Cannot support status quo.</p>
PNUCC	<p>It’s of critical importance that the Canadian Entitlement be reconciled with actual downstream power benefits.</p> <p>Begin renegotiations immediately.</p>	<p>Article XIX of the Treaty allows termination of most provisions while retaining flood control operations.</p>	<p>Agree with Power Group’s Ecosystem principles.</p>	<p>Support Power Group Principles; termination notice necessary if these principles cannot be met.</p> <p>Imbalance of costs and benefits has a negative impact on Northwest economy and needs to be reconciled. New agreement must be made in timely manner.</p>

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NRU	<p>Canadian Entitlement should not exceed one half of actual incremental benefit of coordinated operation.</p> <p>Currently, Treaty provisions are incongruent with an equitable sharing of the benefits, making a disproportionate adverse financial impact on BPA customers.</p> <p>Current Canadian Entitlement does not make economic sense and is cross purposes with BPA's responsibility to operate using sound business principles.</p>	<p>Flood control payments are the responsibility of U.S. taxpayers.</p>	<p>Equitable correction to Entitlement should not lead to increase in mitigation requirements. Robust environmental mitigation plans are already embedded in other projects and legal forums.</p>	<p>Exercise Termination option if these principles cannot be met.</p> <p>Supports Power Group's position.</p> <p>NRU is a non-profit trade association of 52 public power systems in seven states.</p>
Multnomah Drainage District #1		<p>The 600 kcfs scenario poses a greater risk to flood prone areas and those protected by civil flood protection works. Higher flows and longer durations could be catastrophic to communities.</p> <p>Flood risk is less under the 450 kcfs scenario, but the environmental gains are not seen, either.</p>	<p>Some benefits could come from a high flow scenario, such as meeting flow targets for fish and keeping river temperatures cool, but more additional studies need to be done.</p>	<p>Improvements for flood reduction structures would be required for the increased flows to protect communities cost a lot of money.</p> <p>This could yield more benefits but does not come without cost and close studies.</p>

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Port of Portland		Higher high flows and lower low flows may adversely affect navigation on the Columbia River. These scenarios would increase Corps dredging costs.	Higher flows could increase sedimentation in the Columbia River.	Protect navigation interests. Higher flows under consideration could diminish safe handling and commercial efficiency. Lower flows could reduce draft available to shipping.
Pacific NW Waterways Association	Canadian Entitlement should not exceed one half of actual incremental benefit of coordinated operation as compared to a non-coordinated operation.	Higher high flows and lower low flows may adversely affect navigation on the Columbia River. These scenarios would increase Corps dredging costs. The direct estimates input of a 40 foot draft restriction is a minimum of \$22 million per year, affecting millions of tons of cargo.		Pacific NW Waterways Assoc. represents 130 private and public sector markers in Oregon, Washington, Idaho and California. Higher flow levels under consideration could hinder safe, efficient navigation: stronger currents; inability to move full tows; increased sedimentation. Lower flows under consideration will exacerbate lack of available draft. Flows being modeled are higher and lower than historic levels.
Brownlee (Rollie)			Stop drastic Brownlee fluctuations; impact on fishing, resident fish population.	

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Powder Basin Watershed Council		Reserves should be managed to minimize fluctuations.	Concern is Brownlee water level. Fluctuations could harm resident fish populations.	Economic impact of lost resident fish populations and recreation in a tourism-dependent region.
Baker County		Ensure reasonable flood control measures without harm to people, fish and wildlife of eastern Oregon.	Concern is Brownlee water level fluctuations that harm warm water resident fish such as crappie and bass.	Effects on fisheries and economy; reasonable measures to protect life and property.
City of Portland		<p>Ensure flood protection for Portland and want greater involvement in weighing flood risk management alternatives.</p> <p>For example, higher flows could diminish safe handling of ships and barges. Also, lower flows could also impact shipping costing safety and cost problems.</p>	<p>Reflect ecological values and ESA in recommendation; understand ecosystem impacts.</p> <p>Endangered Species Act requirements of salmon and other endangered species need to be reflection SRT recommendation to State Department.</p>	Integrate climate change; want to meet with technical review teams on Treaty matters.

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Universities Consortium	<p>Revise the formula for U.S./Canada benefit-sharing to reflect actual river operations.</p> <p>Facilitate a dialogue on strategies to allocate benefits as well as the costs, such as exporting cheap power out of the basin.</p>	<p>Explore feasibility of alternative means to diversity FRM, including planning to reconnect river to the floodplain and use of aquifer recharge.</p>	<p>Seek to improve ecosystem values and functions, and integrate them into the CRT on par with other objectives. Promote sustainable solutions to Seven Generations. Explore reintroduction of salmon in the Upper Columbia Basin; move toward more natural hydrograph; increase fish passage and non-Treaty dam removal. Acknowledge and address harms to cultural resources and ecosystem function. Explore all potential sources of revenue, including hydropower, to address these harms.</p>	<p>Create and enable an informed and transparent process that engages all basin constituencies.</p> <p>Acknowledge and affirm aboriginal interests, needs, and rights.</p> <p>Employ a “whole basin” perspective in planning and management of the river basin.</p> <p>Expand operational decision-making and management to include broader sovereign representation, particularly Tribes and First Nations.</p>

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Center for Environmental Law and Policy			<p>Concerned with U.S. and Canada not giving enough attention to ecosystem issues. Ecosystem is second priority behind climate change.</p> <p>Broader ecosystem function - explore opening closed salmon habitat; consider salmon access above GCL.</p>	<p>Formulate new Treaty that is more flexible.</p> <p>Climate change is most critical element of Treaty Review process, and biggest challenge facing studies of the U.S. entity. Water supply and demand is priority number three.</p> <p>Integrate climate change/adaptive management for better data; rebalance water supply and demand - keep more water in river; rethink agricultural patterns.</p>
Idaho Rivers United		<p>Don't confiscate space in Boise R. and Upper Snake basin for FRM in Portland; other measures are available for flood risk reduction measures; i.e. move valuable investments out of the floodplain.</p>	<p>Ecosystems need spring freshets; supports natural hydrograph.</p>	

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League of Women Voters Idaho	Concerns about issues in the basin beyond electricity generation.		Minimum stream flows should be established and maintained as a public right. Regional planning should provide for irrigation as well as adequate stream flows for fish. Comprehensive planning needed for conservation and water management.	Create opportunities for citizen information and participation in water resources development. Inventory all water rights, current uses, and projected needs within the Basin and provide to general public. Provide adequate irrigation as well as fish protection.
East Columbia Basin Irrigation District		Lower Lake Roosevelt elevations for flood control should not result in economic burden for Columbia Basin Project landowners. Flood control interests should bear this cost.		Irrigation is the top priority. Must also provide adequate river flows to meet requirements for ESA listed salmonids to the extent it allows the opportunity to withdraw irrigation water from Lake Roosevelt. Maintain water surface elevation of Lake Roosevelt at levels necessary to meet water supply obligations for Columbia Basin Project. Take advantage of opportunities to acquire additional storage.

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Port of Vancouver		Protracted water level swings/changes will reduce utility of the system costing millions of dollars in additional costs to maintain channel and infrastructure for loading and unloading products.		Port activities support 17,000 jobs in community. Port generates \$1.6 billion annually for the region. Accounts for 16 percent of total U.S. wheat exports.