

June 28, 2019

**RE: Willamette Valley System Environmental Impact Statement Scoping**

In response to the U.S. Army Corps of Engineers (Corps) notice of intent to prepare an environmental impact statement (EIS) for the Willamette Valley System (WVS) operations and maintenance, the Public Power Council (PPC) offers the following comments. PPC represents most of the preference customers purchasing power from the Bonneville Power Administration (BPA) who would ultimately fund approximately half of costs associated with Willamette Valley Projects. As a result, PPC and its members have a strong interest in robust EIS evaluation to determine the most cost-effective and biologically sound measures for continued operations and maintenance of the WVS that meet environmental obligations.

This EIS is an opportunity for the Corps to weigh all economic, social, and environmental impacts in determining a preferred action that forges the path forward for the Corps and region in the WVS. Until the EIS is completed and a comprehensive plan for continued operations of the WVS is completed, the Corps should not address isolated issues through expensive capital measures that may not prove useful upon completion of the systemwide EIS.

**Sequencing of WVS Processes Should Follow System EIS**

Given the magnitude of costs associated with the efforts across the WVS and the impacts these costs will have on regional ratepayers and taxpayers, the Corps should use this EIS as an opportunity to reset and influence its other plans throughout the system. Specifically, the Environmental Assessment of the Cougar Dam downstream passage facility and the Detroit Project environmental impact statement should be informed by the systemwide EIS, not the other way around. The proposed capital projects linked to these narrower processes could be improved and a better incorporated part of a broader mitigation strategy. In resetting the table with the systemwide EIS, the Corps has an opportunity to properly sequence the necessary processes and subsequent actions in the Willamette. Doing so would give the region greater faith that the Corps has a deliberate management approach in the WVS.

Further, properly sequencing WVS processes would exhibit that there is a clear expectation of effectiveness of the action that comes from the EIS. Projects within the proposed action would be viewed as needed pieces of a bigger plan instead of one-offs intended to address specific issues without consideration of the broader effort. Without appropriate sequencing of its efforts in the WVS, we believe it will be difficult for the Corps to achieve the technical, biological, and economic objectives it expects from this process.

## **Holistic Management of the Willamette Valley System**

Although the Corps is not responsible for all management within the Willamette Basin, the EIS should consider all management actions and how they are complementary or detrimental to Corps' efforts and vice-versa. For example, while hatchery and harvest management actions are not a Corps responsibility, the EIS should consider these elements to ensure management actions are coordinated, or at least appropriately weighed when developing a long-term WVS plan. As a result, we believe it is appropriate to consider hatchery production program goals and harvest management as part of the EIS in order to understand their impacts and interplay with the resultant proposed action.

The Corps should also work closely with BPA as a cooperating agency in EIS development to produce a thorough analysis of multi-operational effects on power generation. This may include but should not be limited to: economic and biological impacts of operating the system for flood control and water supply purposes, other renewable resource integration, and greenhouse gas impacts.

Additionally, the EIS should consider:

- The most cost-effective options to meet downstream temperature and fish passage requirements,
- Opportunities to modify existing revetment to benefit floodplain function and improve juvenile fish productivity (e.g., set back revetments to flood capacity and improve habitat connectivity and function),
- Adaptive management options allowing for course changes if proposed actions do not meet intended conservation goals,

## **Clarification of the Effectiveness Standard**

PPC understands the Corps' need to meet its mitigation obligations at projects within the WVS. That said, actions should not be implemented unless they appear to meet a clear effectiveness benchmark. For example, the Corps is moving forward on costly downstream trap-and-haul facilities within the WVS without having clearly shown the benefit of these expensive projects. As part of the EIS and as part of the Corps' own proper business practices, it should clarify the effectiveness standard of its recommended actions.

This is to say that as part of moving ahead with costly projects, within the design and planning process, the Corps should clearly show the region its expected measure of effectiveness of the proposed action. If the action does not meet a high-percentage threshold that the action will meet its goals, the Corps should reassess its options to find a better way forward. Merely hoping an action will succeed is unacceptable, especially when they are as costly as those currently proposed in the system.

Providing a clear decision matrix and sharing it at all management levels within the Corps, as well as publicly, is necessary for success in the WVS. With BPA ratepayers under great pressure to competitively serve their customers and with diminishing Congressional appropriation dollars available, the Corps cannot afford to fund projects without high certainty of effectiveness. The way forward set by this WVS EIS can provide the Corps and the region greater certainty of future success.

## **Conclusion**

BPA's customers stand behind solid management principles at both their local utilities and at the regional level. If the Corps will also embrace these principles, we believe it can chart a reasonable path toward meeting its obligations in the WVS.

We appreciate your consideration of these comments and look forward to working with you and your cooperating agencies in developing an alternative that provides the best management direction for the Willamette Valley System.