

October 18, 2007

Mr. Mark Walker Public Affairs Division Director Northwest Power & Conservation Council 851 SW 6th Avenue, Suite 1100 Portland, OR 97204

Dear Mark,

## Comment on "Carbon Dioxide Footprint of the Northwest Power System"

Thank you for the opportunity to comment on your CO2 study. We believe that you have done a good job in characterizing the CO2 impacts of a range of actions on the power system. However, the federal hydropower system is part of a multi-purpose system that includes other authorized purposes, including navigation.

We believe it is appropriate for your study to examine the full range of impacts of the proposed actions. For example, breaching dams or lowering reservoirs below Minimum Operating Pool would not only affect hydropower production, as you have shown, but would also eliminate navigation.

U.S. Army Corps of Engineers statistics (USACE Navigation Data Center, "Waterborne Commerce of the U.S.", 2005) show that an average of 5.65 million tons of cargo move by barge on the Snake River. That is the average volume during the ten years from 1996 to 2005, the most recent year for which data is available.

The chart on page two shows the relationship between barge, truck and rail transport. Moving that amount of cargo requires about 400 four-barge tows, just over one per day. Shifting 5.65 million tons of Snake River cargo to truck would require more than 194,000 truck trips, or more than 500 per day, from the Snake River area to Portland, Vancouver, Kalama and Longview each year.

Rail is not available for some of the area served by barging, so not all barged cargo would be able to be shifted to rail.

If one were to convert those movements to horse power-hours to compare barge and truck, with each towboat at about 3,000 horsepower and each truck at 300-400 horsepower, trucking would

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consume about seven to ten times the energy of barging, with commensurate comparisons for emissions.

We believe that these are significant impacts. Therefore, we encourage you to evaluate the total effects of the actions you examine, including the effects of shifting from barge to other modes of transportation.



Freight Comparison of Barges, Trains and Trucks on the CSRS

One 60,000 ton Panamax vessel = 4 - 5 barge tows = 600 rail cars = 2,400 semi-trucks

Please let me know if you have any questions.

Sincerely,

Lancen

Glenn Vanselow Executive Director

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