



City of Seattle

Michael Patrick McGinn, Mayor

Your Seattle City Light

Jorge Carrasco, Superintendent

February 5, 2013

CRT Review (DKE)
P.O. Box 14428
Portland, OR 97293

Transmitted Electronically:
treatyreview@bpa.gov

U.S. Entity Coordinators, Columbia River Treaty:

Mr. Stephen R. Oliver
Bonneville Power Administration

Mr. David Ponganis
U.S. Army Corps of Engineers, Northwestern Division

Gentlemen,

Thank you for the opportunity to participate in the 2014/2024 Columbia River Treaty Review (“CRT”) stakeholder process. In particular, I wish to thank the staff at the Bonneville Power Administration (“BPA”) and the U.S. Army Corps of Engineers (“Corps”), collectively the “U.S. Entity”, who have worked tirelessly on the modeling efforts to provide better information for decision makers. While Seattle City Light has participated in the development of the joint comments of the “CRT Power Group” and the PNUCC Board of Directors comments, I feel it is important to set forth Seattle’s own perspective, which is more direct.

Seattle City Light supports the US Entity recommending to the U.S. State Department that it send a notice of termination to the Canadian government, triggering the ten year termination period pursuant to the terms of the Treaty. City Light believes this is a necessary precondition for negotiating a comprehensive, basin-wide replacement treaty that can address needs that may have been overlooked in the 1960’s, as well as issues that have arisen since the original CRT was ratified by both nations.

As a department of the City of Seattle, Seattle City Light has a long-standing and deep commitment to the health and sustainability of all Northwest communities. We express this commitment through careful management of the assets entrusted to our control and in how we mitigate the impacts of prior and on-going operation of our generation and distribution



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systems. Seattle City Light believes that its success in managing the Skagit River watershed, including the trans-border Ross Lake, in cooperation with the government of British Columbia, federally recognized Indian Tribes, local, county, state and federal government agencies, as well as other interested stakeholders, can be attributed to a strategically-crafted international treaty that has maintained an alignment of interests, supported by a comprehensive, science-based environmental settlement agreement that offered balanced benefits to all stakeholders.

In the context of the CRT, Seattle's Skagit Basin experience suggests to us that the region's best hope for success in reaching a balanced compromise that addresses the full range of issues related to the management of this invaluable international river resource requires a comprehensive, inclusive and transparent discussion of costs and benefits among stakeholders on both sides of the border. To that end, Seattle City Light recommends the creation of a multi-national, joint stakeholder process that includes meaningful participation by both Canadian and U.S. stakeholders, federal, state, provincial, and local governments, and federally recognized Tribes and First Nations.

We fully acknowledge the daunting scope and potential risks associated with this recommendation, and the probability that a significant amount of time will likely be required to negotiate the new treaty. Seattle City Light is convinced, however, a durable treaty will only be developed through the creation of trust among a core group of stakeholders where decisions are made based upon the best available science and with a balanced regard for the interests of all parties.

Issue Specific Recommendations

With respect to the specific issues the US Entity identified in its January 16, 2013 correspondence with stakeholders, Seattle City Light believes these issues are irrevocably inter-related in a manner that does not lend itself to isolated problem-solving, hence the recommendations we make above. To be successful, we believe a new treaty must deliver an appropriate balance of costs and benefits to stakeholders on both sides of the border.

Hydropower - Like many other consumer-owned utilities in the Northwest, Seattle City Light heavily depends upon the Federal Columbia River Power System to reliably meet the needs of its customers. Further degradation of power generation capability must be matched with measurable improvements in ESA listed species. It is also important for stakeholders to understand the financial, environmental and climate implications of the alternative forms of baseload generation which are currently available.

Flood risk - Seattle City Light believes that flood risk management is a federally mandated activity which federal funding should support.



Ecosystem – Basin-wide ecosystem recovery efforts will have to occur on both sides of the US-Canadian border, with strong coordination and reasonable financial commitments by all interested parties.

Water supply – Seattle City Light's understands that the Columbia River is currently over-appropriated and that additional water for consumptive use or in-stream flow regimes will require significant adjustment to the future expectations of most, if not all, stakeholders.

Recreation – Since recreation on the Columbia River system and its tributaries is one of the most important opportunities for members of the public to enjoy this trans-border, national treasure, and to become better informed of the myriad uses the river currently supports, recreation must be part of any discussion of balanced costs and benefits.

Navigation – Maintaining commercial navigation is critical to many of the rural communities that depend on the river.

Water quality – Maintaining and improving water quality is a critical environmental management issue for the Columbia River and Seattle City Light is committed to supporting efforts that improve water quality in a meaningful and cost-effective manner.

Climate change - Seattle City Light supports improving the modeling and forecasting work as climate change continues to impact the Columbia River ecosystem as an essential component to the scientific basis for mitigating impacts on the citizens of both nations.

Conclusion

Seattle City Light thanks the U.S. Entity and their respective agency staffs for their hard work and diligence. We look forward to continuing to work with them in the coming months and years to develop a meaningful, basin-wide approach to collectively managing all the ecological, economic, electric, and cultural benefits of the magnificent Columbia River, which has been entrusted to our care. The sooner the Columbia River Treaty can be renegotiated, the sooner a new treaty can be put in place that better aligns the interests of all parties. It is time for the region to get to work on a new treaty. If you have any questions, please do not hesitate to contact Robert Cromwell, at (206) 684-3856 or at robert.cromwell@seattle.gov.

Sincerely,



Jorge Carrasco
Superintendent

