



November 19, 2025

Washington State  
Energy Facility Site Evaluation Council (EFSEC)  
Sent via: [efsec@efsec.wa.gov](mailto:efsec@efsec.wa.gov)

Re: Cascade Renewable Transmission EFSEC Docket No. 230002

On behalf of the Pacific Northwest Waterways Association (PNWA), I write to express deep concerns regarding the Cascade Renewable Transmission, LLC's proposal to build a linear transmission line from the The Dalles to Portland, Oregon running from Stevenson, Washington, across and through approximately 78.3 the Columbia River Federal Navigation Channel. In 2023, the Federal Navigation Channel supported over 51.1 million metric tons of cargo valued at approximately \$25.3 billion. Over 40,000 local jobs are dependent on this trade. The Columbia Snake River System is the largest wheat export gateway in the country, second in the nation for soy and the third largest grain export gateway in the world.

PNWA has over 150 members, including ports, barge companies, steamship operators, grain elevator operators, agricultural producers, electric utilities, irrigation districts, and union labor throughout Washington, Oregon, and Idaho. Our association supports projects to advance and protect the region's navigation infrastructure, freight mobility, economic health, and the environment. We support the region's multi-modal transportation system, which provides safe, efficient, and reliable links to competitive domestic and world markets.

As we understand from the EFSEC announcement and the previous project announcement by the Corps of Engineers, installation of the transmission line would take approximately six (6) months for underground installation and approximately six (6) months for in-river installation. The project proposes to directly impact the Columbia River Federal Navigation Channel and its primary purpose. We are concerned about the lack of transparency and lack of communication with stakeholders who operate on the river system or whose businesses rely on shipping, barging, towing, or cruising in the development of this project proposal.

Washington is one of the most trade dependent states in the country. We believe this project will have significant and serious impacts to Washington's trade, reliable navigation channel, Washington employers and the maritime jobs dependent on this major U.S. export gateway. We believe the State and EFSEC should require detailed information from the project applicant regarding navigation stakeholder engagement, anticipated navigation impacts of project construction, navigation impacts to dredging and federal channel maintenance, as well as plans to address and mitigate for navigation impacts.

Between Vancouver, Washington and The Dalles, Oregon, the federal navigation channel is currently maintained to a depth of seventeen (17) feet. However, it is authorized to a depth of

twenty-seven (27) feet with (2) two or possibly three (3) feet of advanced maintenance dredging. We understand from the project proposal that the cable bundle would be buried to a depth of thirty-four (34) feet. Should economic circumstances warrant dredging that section of the Columbia River to its full authorized depth, there is concern that four (4) feet may of cover for the buried cable bundle may be inadequate for operations and safety.

Most concerning is that the proposed cable bundle would cross over and be in the Federal Navigation Channel for a significant distance. Maintaining the Federal Navigation Channel requires frequent dredging of shoals and sometimes requires realignment of the channel. There is considerable concern that laying underground/underwater cabling through the area in and adjacent to the Federal Navigation Channel could significantly interfere with maintenance dredging operations. As navigation impacts and mitigation do not appear to be addressed in the proposal, it is unclear how the applicant proposes to address navigation impacts during the construction of the proposed coffer dams and proposed cable installation process. Much more information is needed to fully understand the project, its objectives, impacts to navigation, and alternative routing options for the cable bundle outside of the Columbia River Federal Navigation Channel.

Thank you very much for your consideration of our concerns and we look forward to a prompt response.

Respectfully submitted,



Neil Maunu  
Executive Director  
Pacific Northwest Waterways Association

