



Columbia River Steamship Operators' Association, Inc.

November 19, 2025

Washington State
Energy Facility Site Evaluation Council
PO Box 43172
Olympia, Washington 98503-3172
via email: efsec@efsec.wa.gov

Subject: Concerns regarding Cascade Renewable Transmission, LLC's proposal to construct a linear transmission line extending from The Dalles to Portland, Oregon

Dear Council Members,

The Columbia River Steamship Operators' Association (CRSOA) would like to express our concerns regarding Cascade Renewable Transmission, LLC's proposed linear transmission line extending from The Dalles to Portland, Oregon, which involves multiple crossings through the Columbia River Federal Navigation Channel (FNC). This critical waterway is essential to the regional economy and to our members, who depend on its uninterrupted, safe, and efficient operation. Established in 1922, the CRSOA consists of members representing ship owners, operators, agents, launch services, towing, and bunkering, as well as facilities and ports along the Columbia, Willamette, Snake River and Oregon Coast River Systems. The mission of the CRSOA is to facilitate trade, provide business leadership, exercise principles of environmental stewardship, serve as an industry focal point, and promote operating policies and procedures that are safe, reliable, efficient, and cost effective.

The Columbia River trade corridor is the lifeblood of our regional economy and in 2023, facilitated the movement of over 51.1 million metric tons of cargo at a value of \$25.3 billion. Our system supports over 40,000 local jobs. Disruption to the navigability of this important waterway could result in substantial economic and operational consequences, especially for industries reliant on this cost-efficient transportation route.

Concerns Regarding Transmission Line Depth and Dredging

The project plans state that "where the cable bundle crosses the navigation channel prism, below Bonneville Lock and Dam, the cable would be installed to a depth of at least -34 feet in Columbia River Datum (CRD), potentially requiring installation deeper than 10 feet below the mudline." We have significant concerns that this depth is insufficient, particularly where future dredging may be necessary.

The FNC within the project area, from River Mile (RM) 190 to RM 106, is maintained at -17 feet CRD, with authorization for dredging up to -27 feet CRD. Advanced maintenance dredging is practiced several feet below the authorized channel depth, as well as outside the authorized channel width, to remove additional material from critical shoals and to maintain depths for longer periods of time and increase navigation safety. Given the dynamic nature of the riverbed, the proposed burial depth may



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pose a risk of cable exposure in areas where additional dredging is needed. This could compromise navigation safety.

We align with the concerns raised by the Pacific Northwest Waterways Association (PNWA) and our members at Tidewater Transportation and Terminals. The transmission lines' proximity to the FNC, without clear mitigation strategies, risks interference with essential dredging operations and creates potential hazards, especially for vessel maneuverability and emergency anchoring.

Lack of Risk Assessment and Mitigation Planning

We are particularly concerned about the absence of a comprehensive risk assessment evaluating the long-term impact on channel maintenance and navigation safety. The project does not clearly outline mitigation strategies for installation or operation phases, nor does it specify provisions for liability insurance or indemnification in the event of damage or disruption to river traffic. These omissions could leave critical stakeholders exposed to unacceptable risks.

Insufficient Stakeholder Engagement

Furthermore, we are troubled by the lack of public engagement during the project's planning stages. To our knowledge, key river stakeholders, including shipping companies, barge operators, and towing services, have not been adequately consulted.

Given the Columbia River's significant role in regional and international trade, it is imperative that the State and EFSEC take these concerns into account and require the applicant to address them. We respectfully request additional information on how Cascade Renewable Transmission plans to mitigate these operational and safety challenges. We look forward to your response and hope for a continued dialogue to ensure the interests of river operators and other affected stakeholders are fully considered.

Respectfully,

Kate Mickelson
Executive Director