



August 20, 2020

Mr. Daniel Opalski
U.S. Environmental Protection Agency, Region 10
Mail Code 10-C09
1200 Sixth Ave
Seattle, WA 98101
ColumbiaRiverTMDL@epa.gov

Re: Total Maximum Daily Load for Temperature in the Columbia and Lower Snake Rivers

Dear Mr. Opalski:

The National Hydropower Association¹ appreciates the opportunity to comment on the Total Maximum Daily Load (TMDL) for Temperature in the Columbia and Lower Snake Rivers issued by the U.S. Environmental Protection Agency (EPA). NHA is supportive of the comments submitted by the Northwest Hydroelectric Association and Northwest RiverPartners.

The TMDL recognizes that air temperatures have increased by 1.5 degrees Celsius since 1960. If the temperature continues to increase at this rate it has the potential to drastically impact the environment. Reducing emissions from the electricity sector by expanding renewable energy is an important step in our efforts to reverse this trend. NHA believes the hydropower resources on the Columbia and Snake Rivers are indispensable sources of renewable energy and are essential components of any climate change solution. In addition, should the climate continue to warm despite our efforts to reduce emissions, dams are useful tools to manage water if environmental conditions change.

While the EPA's production of the TMDL may not be the appropriate venue to consider emissions and climate change policies, implementation of the TMDL must look more broadly. The dams included in this TMDL serve multiple purposes, including irrigation, recreation, navigation, fish and wildlife restoration, and renewable energy generation. How these resources operate is the result of extensive stakeholder processes and collaboration. In addition, the retirement and replacement of fossil fuel resources in the region poses a serious resource adequacy challenge for the electric grid and financial costs to ratepayers. Policies designed to implement the TMDL must consider and balance the TMDL in context with the multipurpose nature of these dams and their stakeholders.

¹ NHA is a non-profit national association dedicated exclusively to advancing the interests of the United States hydropower industry, including conventional, pumped storage, and new hydrokinetic technologies. NHA promotes the role of hydropower as a clean, renewable, and reliable energy source that advances national environmental and energy policy objectives. NHA's membership consists of more than 245 organizations, including public power utilities, investor-owned utilities, independent power producers, project developers, equipment manufacturers, environmental and engineering consultants, and attorneys.

As the national trade association for the hydropower industry, NHA is uniquely situated to provide information on hydropower's growing role in the nation's climate change policies. As the EPA notes, implementation of the TMDL is the responsibility of Washington and Oregon, but EPA will remain a key facilitator amongst stakeholders. NHA requests to be included in EPA stakeholder outreach and to be notified of opportunities to supply information and public comments.

Hydropower, including pumped storage, is the number one source of renewable energy in the Pacific Northwest, the United States, and the world. Hydropower is a renewable, baseload, and dispatchable resource that integrates other renewables, such as wind, solar, and batteries.² As Washington and Oregon aim to decarbonize their economies, hydropower can serve as the foundation of our renewable energy future.

NHA looks forward to working with EPA and other stakeholders on these issues.

Sincerely,

Dennis Cakert
Manager of Regulatory Affairs and Market Policy
National Hydropower Association
601 New Jersey Ave NW
Washington, D.C. 20001
Email: Dennis@hydro.org

² See joint Op Ed from the Solar Energy Industries Association, American Wind Energy Association, Energy Storage Association, and the National Hydropower Association: <https://morningconsult.com/opinions/the-u-s-electric-grid-of-the-future-powers-a-stronger-economy-and-environment/> (Morning Consult, June 26, 2020).