

March 21, 2022

Sara Gonzalez-Rothi
Senior Director, Council on Environmental Quality

Submitted via electronic mail

RE: Importance of Federal Hydropower in the Pacific Northwest

The Public Power Council (PPC) would like to express appreciation for the opportunity to participate in a recent February 22, 2022 listening session with staff from the Council Environmental Quality (CEQ). As we will reinforce below, issues related to the future operations of the Federal Columbia River Power System (FCRPS) are of critical importance to the environment and economics of the Pacific Northwest region and United States at large.

PPC is the overall trade association for the non-profit, public power utilities in the Pacific Northwest who are eligible to purchase wholesale power and transmission services from the Bonneville Power Administration (BPA) at cost. Northwest public power relies on BPA for a reliable, cost-effective, and environmentally responsible power supply. For its part, public power has regularly demonstrated its commitment to funding a world-class fish and wildlife program to mitigate for the impacts of Columbia River System Operations (CRSO) in a scientifically sound manner. Public power therefore has vital interests in the system from both economic and environmental stewardship perspectives.

We are deeply concerned about the potential for adverse changes in hydro system operations following the current stay in CRSO litigation on July 31, 2022. Public power must be engaged in the analysis necessary for the development of successor operations, whether short or long-term.

The clean, renewable hydro projects of the Northwest are the single largest electricity source for our region. But dramatic operational changes give cause for alarm, and we need CEQ to understand these serious concerns. We also must emphasize that public power is committed to scientific, cost-effective mitigation for the impacts of hydro system operations on fish and wildlife. At the same time, the health and survival of salmon goes beyond our stewardship responsibility; they are an important part of the history, culture and economy of the Northwest. A distorted narrative is being propelled by some interests regarding the health of salmon in our region that must be clarified.

Making the wrong choices about Northwest hydro could have devastating consequences for electric power system, including risks to human health and safety along with economic impacts. The adequacy and reliability of the Northwest electric system is already a concern today and

proposed dramatic changes to the system could cause blackouts as more and more dispatchable thermal resources, such as coal and natural gas-powered generation, are retired without substantive replacements for the lost capacity they provide for the grid. These reliability concerns are exacerbated by increasingly extreme weather events and wildfires. Substantial loss of hydro generation would also greatly increase the energy costs of public power communities, which already disproportionately serve low-income and rural areas of the Northwest.

The health of our salmon is of utmost importance to public power and the communities we serve. We take our stewardship responsibilities very seriously and are making concerted investments in the survival of salmon. We need sound data before we make operations changes that could harm them. PPC and its members are working to enhance biological monitoring and data collection approach this spring and going forward that will be helpful in getting more solid data about the effects of various ops changes on salmon/resident fish.

Indeed, BPA runs one of the world's largest fish and wildlife mitigation programs, thanks largely to the funding of Northwest citizens and businesses through their consumer-owned, non-profit utilities. About a quarter to a third of the bills Northwest public power utilities fund BPA's fish and wildlife program, at \$611.5 million in total cost in 2020, of which \$238.1 million was direct programmatic funding.

Salmon survival rates fluctuate due to the biggest driver – ocean conditions – yet even with the effects of climate change, continued large-scale salmon fishing, and other factors, salmon runs are stable. This shows that these mitigation efforts through the BPA program are having real and meaningful impacts.

Issues and concerns related to the Northwest federal hydro system are both complex and incredibly impactful. Our hydro system fits well with the Biden Administration's priorities – but we will struggle or more likely fail to meet heightened needs for clean electricity and energy security if our hydro system is hobbled. We would like to reiterate our invitation to CEQ leadership and staff for a further “deep dive” webinar or other forum. Public power also has a variety of additional resources available on these topics at the ready and under development.¹

Finally, we would appreciate any clarity that CEQ can provide about its role on these issues and the process going forward.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Scott Simms', with a stylized, cursive script.

Scott Simms
Executive Director, Public Power Council

¹ See, for example PPC's [“White Paper on the Value of the Lower Snake River Dams”](#) and the recent report from Northwest RiverPartners [“An Examination of Northwest Energy Coalition February 2022 White Paper on Replacing the Lower Snake River Dams”](#).