

November 14, 2022

Abigail Connor
United States Environmental Protection Agency

Submitted electronically to conner.abigail@epa.gov

RE: Draft NPDES Permit, Dworshak Dam, Idaho, #ID0028586

Ms. Connor,

The Public Power Council (PPC) appreciates this opportunity to provide comments on proposed NPDES permits for Dworshak Dam, a multipurpose federal hydroelectric facility that is part of the Federal Columbia River Power System. 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 the impacts of hydro operations in a scientifically sound manner. Public power therefore has vital interests in the system from both economic and environmental stewardship perspectives.

In addition to these comments, PPC supports and urges utmost consideration of the comments submitted by BPA and the U.S. Army Corps of Engineers.

PPC's comments on this matter are primarily concerned with the proposed mercury and methylmercury monitoring requirements. Although mercury contamination is a serious issue, NPDES permits are not an appropriate mechanism for monitoring requirements in this instance. NPDES requirements are intended to address point source discharges of pollutants. The operation and maintenance of hydroelectric facilities such as Dworshak Dam do not produce mercury discharges.

Rather, the mercury and methylmercury at issue for monitoring in this permit process are from non-point sources. Mercury and methylmercury in lakes, whether naturally formed

or man-made, are driven by sources such as mining or air deposition as a result of coal combustion.

Given that Dworshak does not create mercury issues through its operations and maintenance, burdensome mercury testing requirements through NPDES permits are inappropriate. Non-point source pollutants are more appropriately addressed holistically and therefore the proposed testing requirements should be removed from the final permits.

Further, PPC urges rejection of any NPDES conditions that would interfere with Dworshak water releases. As part of the integrated Federal Columbia River Power System, Dworshak operations facilitate efficient hydroelectric generation that substantially reduces the need for coal generation, which in turn reduces the potential for future air deposition of mercury.

Finally, in addition to power generation, cold water releases from Dworshak are essential for meeting temperature requirements to support migration of juvenile salmon, including endangered species. This includes thresholds under the temperature Total Maximum Daily Load (TMDL) for the Lower Snake and Columbia Rivers as well as requirements of the 2020 National Marine Fisheries Service Columbia River System Biological Opinion (Biological Opinion).

Thank you for your consideration of these comments.

Sincerely,



Michael Deen
Policy Director, Public Power Council