

August 13, 2020

Andrew Wheeler, Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

*Submitted via electronic mail*

**RE: TMDL for Temperature in the Columbia and Lower Snake Rivers**

Dear Administrator Wheeler,

The Public Power Council (PPC) is a trade association representing the interests of non-profit, consumer owned utilities in the Pacific Northwest. Our members depend on the federally owned and operated hydroelectric facilities on the Columbia and Lower Snake Rivers for reliable, affordable, and clean electric power to support their local communities and economies.

PPC recently submitted comments directly to Region 10 regarding the proposed TMDL for Temperature in the Columbia and Lower Snake Rivers (attached). This TMDL has the potential to substantially effect the power costs of our member utilities and the communities they serve. As described in the comments, we have significant technical, factual, and practical concerns with the TMDL as currently formulated. The unrealistic allocations in the TMDL are an outcome of the inherent limitations of the TMDL's boundary, its inability to look at temperature impacts holistically on a basin-wide scale, as well as specific modeling assumptions.

PPC's comments focus on both the overall limitations in the TMDL as well as specific assumptions that should be changed:

- The Columbia and Snake Rivers receive water from tributaries in Idaho and Canada that frequently exceed the numeric temperature standards used by EPA in the TMDL, and these inflows make attainment of the water quality criteria within the TMDL's boundary impossible.
- The standards used in the TMDL are likely unattainable because they are based on fish biology and are not representative of water temperatures in free-flowing Columbia or Lower Snake rivers, which could frequently exceed the twenty-degree Celsius standard.
- Climate change impacts on river temperatures, which is one of the largest contributors to water quality temperature exceedances, has not been incorporated into the TMDL due to its narrow scope. This is a significant element to exclude from consideration.

- EPA should incorporate uncertainty and error into its allocations, as these are based on modeling assumptions and likely do not accurately reflect real-world conditions.
- EPA should remove cooling water impacts of Dworshak from the free-flowing scenario used to calculate allocations. This cooling water impact is not representative of water temperatures in a free-flowing river without dams and is inappropriate.

Given the potential of this TMDL to serve as a national precedent, we wish to bring these concerns directly to your attention. The impacts of a poorly designed and implemented TMDL for temperature in the Columbia and Snake Rivers is far reaching.

PPC supports water quality efforts that are scientifically rigorous and effective from both an environmental and cost perspective. We look forward to working with the EPA and other stakeholders going forward on these important issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Simms".

Scott Simms  
Executive Director, Public Power Council

Cc: Dave Ross, Assistant Administrator, EPA Office of Water  
Chris Hladick, Administrator, EPA Region 10