



PUBLIC UTILITY DISTRICT NO. 1 BOARD OF COMMISSIONERS
OF MASON COUNTY
N. 21971 Hwy. 101
Shelton, Washington 98584
MIKE SHEETZ, Commissioner
JACK JANDA, Commissioner
RON GOLD, Commissioner

December 29, 2025

Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

RE: Columbia & Snake River Temperature TMDL Implementation Plan

To Whom it May Concern,

Mason County Public Utility District No. 1 (Mason PUD 1) appreciates the opportunity to provide comments on the Columbia & Snake River Temperature Total Maximum Daily Load (TMDL) Implementation Plan.

Mason PUD 1 is a small, consumer-owned public utility serving approximately 5,600 electric meters on the Hood Canal in Mason County, Washington. A significant portion of our service territory includes state-designated disadvantaged communities, rural populations, and low-income households that are particularly sensitive to increases in energy costs and disruptions to electric reliability. Affordable, reliable hydropower from the Federal Columbia River Power System, and specifically the Lower Snake River Dams (LSRD), is foundational to our ability to keep the lights on while maintaining affordable rates for the communities we serve. The same is true for public utilities across Washington State.

We respectfully submit that the State of Washington's implementation of the temperature TMDL must address significant flaws and unresolved issues in the underlying analysis to avoid unintended consequences for public power utilities and the vulnerable customers who rely on them.

Water Entering Washington Already Exceeds Temperature Standards: Waters entering Washington from upstream sources, including Canada, Idaho, and major domestic tributaries, routinely exceed Washington's temperature standards before crossing into the state. However, the TMDL does not meaningfully account for these upstream thermal conditions. It's important that you account for this in your analysis.



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The U.S. Environmental Protection Agency's 2021 TMDL analysis acknowledges that: "...where the rivers cross the upstream boundaries of the TMDL study area (Canadian border and the Washington/Idaho border), the water temperatures exceed the Washington water quality criteria by a substantial margin from June through September. The current water quality conditions present a significant challenge to achieving downstream water quality standards in Washington and Oregon."

If upstream thermal loading is not incorporated into the implementation and enforcement framework, Ecology's approach will fail to accurately reflect real-world system conditions. Mason PUD 1 urges the Department to explicitly recognize these upstream influences and incorporate reasonable accommodations into its compliance and enforcement strategy.

The Hydropower System Has Moderated, Not Exacerbated, River Temperatures: The temperature standard being applied does not reflect the historical or operational realities of the Columbia/Snake River system. Multiple studies demonstrate that the federal hydropower system, including the Lower Snake River Dams, acts as a thermal buffer, reducing peak summer temperatures and moderating variability during extreme heat events.

Since the early 1990s, cold-water releases from Dworshak Reservoir, requested by fisheries agencies and sovereign Tribes, have been intentionally used to cool river temperatures during critical fish migration periods. These actions reflect a system actively mitigating temperature impacts driven largely by increasing regional air temperatures, not exacerbating them.

Research from the Pacific Northwest National Laboratory and the U.S. Geological Survey further concludes that unimpounded river systems warm more rapidly and reach higher midsummer temperatures than impounded systems.

Reliability and Affordability Implications for Disadvantaged Communities: For Mason PUD 1 and many other public utilities across Washington, every megawatt generated by the Lower Snake River Dams matters. Hydropower from this system provides carbon-free, dispatchable energy that stabilizes wholesale markets, supports grid reliability, and helps prevent rate increases, particularly for low-income and disadvantaged customers who have the least ability to absorb higher energy costs. Implementation of the TMDL in a manner that constrains hydropower operations without accounting for upstream conditions, climate-driven warming, and the system's demonstrated cooling benefits risks undermining both environmental objectives and social equity goals. Increased power costs or reduced reliability would disproportionately impact rural and disadvantaged communities like those served by Mason PUD 1.



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The Board of Commissioners of Mason County PUD No. 1 respectfully urges the Department of Ecology to incorporate the full body of scientific evidence, acknowledge upstream thermal contributions, and recognize the essential role of the Columbia/Snake River hydropower system in maintaining affordable, reliable electricity for Washington's communities, particularly for those that are disadvantaged and rural.

Thank you for the opportunity to comment. We appreciate your consideration of these concerns as you move forward with the Columbia & Snake River Temperature TMDL Implementation Plan.

Sincerely,

A handwritten signature in blue ink that reads 'Ron Gold'.

Ron Gold
Board President

A handwritten signature in blue ink that reads 'Mike Sheetz'.

Mike Sheetz
Vice President

A handwritten signature in blue ink that reads 'Jack Janda'.

Jack Janda
Board Secretary