



PUBLIC UTILITY DISTRICT NO. 1

Cowlitz County, Washington

961 12th Avenue

Longview, Washington

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:

Thank you for the opportunity to provide comments on the Columbia & Snake River Temperature Implementation Plan.

Public Utility District No. 1 of Cowlitz County is a community-owned, locally regulated utility created by a vote of the people in 1936. Today, Cowlitz PUD provides clean, reliable and affordable electric service at cost-based rates to 54,000 customers in Cowlitz County. Nearly 90% of the PUD's electricity resources are provided by the Bonneville Power Administration (BPA) through the Federal Columbia River Power System. Cowlitz PUD is BPA's third largest utility customer, and it supplements its long-term electricity contract with additional owned and contracted hydro and resources located in Washington State.

Given this significant reliance on the federal hydro system, the accurate and effective implementation of the TMDL plan is of singular importance to the residents, businesses and industries served by Cowlitz PUD, whose lives, livelihoods and well-being depend upon reliable access to affordable electricity. Alternatively, missteps in the development and application of the methodology used to implement a TMDL standard can result in significant adverse impacts to electricity ratepayers and place the reliability of the regional grid in jeopardy.

We are concerned that the Department of Ecology's TMDL implementation plan will not accurately reflect changes in the system if it does not include water entering from Canada, Idaho, and other significant tributaries known to produce warmer water. The EPA's 2021 TMDL analysis notes that the temperature of water crossing into Washington often exceeds the state's Washington water quality criteria, which creates challenges for compliance downstream. The Department should recognize these factors and make appropriate accommodations to their enforcement approach accordingly.

Additionally, there is substantial evidence and numerous examples where the hydropower system has been deployed to help mitigate high water temperatures.

Multiple studies have demonstrated that the Columbia and Snake River Dams act as thermal buffers, absorbing heat and reducing temperature spikes during the hottest months. Since the 1990s, cold-water releases from Dworshak Reservoir – at the request of fisheries and sovereign tribes – have been used to lower temperatures during fish migration. There are multiple studies, including from Pacific Northwest National Laboratory and National Marine Fisheries Service for the U.S. Army Corps of Engineers that show historic and contemporary patterns of river impoundments and hydroelectric turbine flow decreasing water temperature variability and mitigating extreme temperature spikes when compared to un-impounded portions of the Snake River.

Thank you again for this opportunity to provide comments on this process. We ask the Department of Ecology to consider these and other comments, and to include more analysis of the baseline temperatures of the riverways.

Sincerely,

Steve Taylor

Steve Taylor
Director of Regulatory & Regional Affairs