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We have deep concerns about the approach taken by the EPA in formulating the TMDL and flaws in the analysis resulting from that approach. The Department of Ecology has the opportunity to recognize and remedy those flaws as it develops the mechanics for implementing the TMDL.

A temperature TMDL that does not account for analysis flaws is likely to result in excessive pressure on the hydropower system and reduce the ability to operate the dams for badly needed hydropower. At a time when every megawatt is essential in the region, more regulations that reduce the ability to generate clean and renewable hydropower based on an incomplete analysis of the impact of hydropower dams are not the answer the region is seeking.