



## Big Bend Electric Cooperative, Inc.

1373 N. Hwy 261  
PO Box 348  
Ritzville WA 99169

Telephone: (509) 659-1700  
Toll Free: (866) 844-2363  
Fax: (509) 659-1404

December 16, 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:

This letter is intended to provide input on the implementation of the TMDL. Big Bend Electric Cooperative (BBEC) is a not-for-profit, consumer-owned electric utility provider. We serve over 11,000 meters located in Adams and Franklin counties. Seventy percent of the power we distribute is generated by hydropower in the Pacific Northwest.

We encourage the State of Washington to consider the significant flaws and other issues in the existing TMDL while developing the State's implementation plan. One of which is the fact that **water coming into the State of Washington already exceeds the temperature standard before it ever reaches the state.**

Upstream waters from Canada and domestic rivers regularly exceed the temperature standard before they even reach the Washington border. Yet the TMDL fails to account for these upstream conditions.

The EPA's 2021 TMDL analysis notes 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."

The Department of Ecology's TMDL implementation will not accurately reflect changes in the system if it does not consider water entering from Canada, Idaho, and other significant tributaries known to produce water warmer than the Department's standard. In developing their enforcement regime, the Department should recognize these realities and make appropriate accommodations to their enforcement approach accordingly.

An important note is the fact that the hydropower system has helped moderate and even cool river 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. These are not the actions of a system making things worse. They are evidence of a system actively mitigating temperature challenges, exacerbated by warming air temperatures.

It is critical that the Department's TMDL Implementation Plan does not reduce hydropower generation arbitrarily. The Pacific Northwest region is struggling to keep up with demand and an aging grid while legislation has taken power generation resources offline to meet carbon reduction goals. The gap between the energy we have and the energy we need is growing wider. Rolling blackouts during extreme weather events can be prevented and we can save lives, but only if we utilize our renewable hydropower resources.

As power suppliers to a large portion of Washington state's irrigated agriculture basin, we encourage the Department to take into consideration the tremendous impact hydropower operations have on food security in the region as well as globally. Power blackouts during extreme heat events could create catastrophic food production loss across multiple counties by rendering irrigation pumps useless. Not to mention the possible loss of life if power blackouts were to occur during extreme cold snaps.

Reducing hydropower generation before sufficient replacement resources are available would be devastating to an electrical grid that has already reached maximum capacity. We urge the Department of Ecology to consider this information as you move forward with the Columbia & Snake River Temperature TMDL Implementation Plan.

Respectfully,

A handwritten signature in black ink, appearing to read 'Kelly Haugh', written in a cursive style.

Kelly Haugh  
Manager of Community Relations