

Tacoma Public Utilities/Tacoma Power (Logan Bahr)

RE: Columbia & Snake River Temperature TMDL Implementation Plan

To whom it may concern:

Tacoma Power appreciates the opportunity to comment on the Columbia & Snake River Temperature TMDL Implementation Plan. As a public power utility committed to clean energy and environmental stewardship, we support efforts to improve water quality and fish habitat. At the same time, we believe it is essential that implementation decisions reflect the full complexity of the scientific record and the operational realities of the regional power system.

The scientific understanding of how dams influence river temperatures remains unsettled. Studies examining historic and contemporary temperature patterns show that the thermal dynamics of the Columbia–Snake system are multifaceted, and in some cases, hydropower operations may help moderate temperature extremes. Given these uncertainties, we encourage Ecology to ensure that regulatory requirements are grounded in the most complete and balanced interpretation of available science.

We are also concerned that additional operational constraints on the hydropower system could worsen the region's resource adequacy challenges. Hydropower provides unmatched flexibility, carbon free generation, and essential capacity—attributes that are increasingly critical as Washington transitions to a more electrified and carbon-free future. If new regulations diminish the ability of the hydropower system to operate effectively, the resulting impacts on reliability and affordability could undermine the broader clean energy transition.

For these reasons, Tacoma Power urges the Department to take a careful, measured approach as it finalizes the TMDL implementation plan. Protecting water quality and supporting salmon recovery are vital goals, but they must be pursued in a way that preserves the reliability, affordability, and clean energy value that hydropower provides to communities across Washington.

Thank you for considering our comments.

Regards,

Logan Bahr
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Tacoma Public Utilities/Tacoma Power