



May 5, 2021

Via Email

Mr. Greg Apke
Statewide Fish Passage Program Leader
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302
Mr. Apke:

The Northwest Hydroelectric Association (NWEHA) is a non-profit trade association that represents and advocates on behalf of the Northwest hydropower industry. NWEHA has over 125 member companies from all segments of the industry. NWEHA is dedicated to the promotion of the Northwest region's hydropower resources as a clean, efficient, and cost-effective source of energy while maintaining fundamental environmental protections.

NWEHA is grateful to ODFW for undergoing the rules revision process and thanks to the RAC members for their contributions. NWEHA applauds ODFW's work to align fish passage policies with the Ocean and Climate Policy, which includes a goal of striving towards Carbon-free operations. When implemented thoughtfully, hydropower has an important role to contribute our clean energy future. Hydropower is a renewable, carbon-free, clean energy resource that will help unlock the integration of other renewable energy resources while protecting the environment we all care about.

NWEHA is supportive of ways to clarify the regulations and policies implementing Oregon's fish passage statutes to ensure that updates to the policies promote clean energy without impeding fish passage or by enhancing passage, where feasible. We have been working with our member companies to review the Oregon Administrative Rules (OARs) to identify where clarifications to policies and definitions can improve our ability to find opportunities for addressing changing climate conditions by simultaneously providing fish passage and clean energy solutions.

From these members, you will hear proposed revisions that can clarify net benefit, appreciable benefits, and unlock capacity for power at nonpowered dams which currently provide non-energy benefits to communities. NWEHA encourages the Rules Advisory Committee not to foreclose on a clean energy future through the adoption of revisions that do not consider the full import of benefits that hydropower provides to a clean energy system.

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*For a list of Directors,
please visit our website.*

Thank you for your work and consideration of these comments as you develop the recommended rules revisions.

Warmest regards,

A handwritten signature in black ink, appearing to read "Brenna Vaughn". The signature is fluid and cursive, with the first name "Brenna" being more prominent than the last name "Vaughn".

Brenna Vaughn
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