



September 29, 2022

**Via EMAIL**

Greg.d.apke@odfw.oregon.gov

Mr. Greg Apke  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

Mr. Apke:

The Northwest Hydroelectric Association (NWAHA) is a non-profit trade association that represents and advocates on behalf of the Northwest hydropower industry. NWAHA has over 125 member companies from all segments of the industry. NWAHA 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.

NWAHA appreciates the Oregon Department of Fish and Wildlife's (ODFW) review and revision of its fish passage administrative rules and recognizes the Rules Advisory Committee (RAC) for their contributions. NWAHA applauds ODFW's work to attempt to align fish passage policies with their new Climate and Ocean Change Policy, which includes a goal of striving towards carbon-free operations. Addressing climate change will require prudent, near-term actions and delicate trade-offs between costs and benefits to support ODFW's mission to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. Hydropower, in all its forms, will provide important contributions to our clean energy future.

NWAHA 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 by not impeding fish passage or by enhancing fish passage enhancements, where feasible. NWAHA has worked with our member companies to review the Oregon Administrative Rules (OARs) to identify where clarifications to policies and definitions will align with climate change policy and maximize rate/taxpayer investments. NWAHA provided comments to ODFW's RAC on May 5, 2021. Some of NWAHA's comments and suggested edits were addressed in RAC meetings and/or incorporated in ODFW's August 31, 2022, final draft of the proposed rule revisions. NWAHA appreciates ODFW's consideration of this input. Some of NWAHA's comments and suggested edits were not addressed or acknowledged in the public forum of the RAC meetings, nor were they incorporated in ODFW's August 31, 2022, final draft of the proposed rule revisions.

**BRENNVA VAUGHN**  
*Executive Director*

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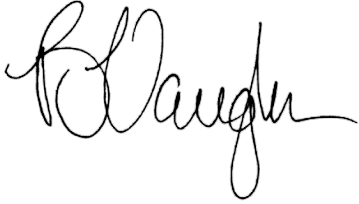
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*For a list of Directors,  
please visit our website.*

NWHA is aware that some of our member companies, including PacifiCorp, have submitted additional comments on this proceeding and we encourage ODFW to fully consider and incorporate those comments in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Brenna Vaughn". The signature is fluid and cursive, with a large initial "B" and a long, sweeping tail.

Brenna Vaughn, Executive Director