



July 28, 2023

Attn: Regulatory and Customer Service Division Chief
Wetlands and Waterways Protection Program
Water and Science Administration
Maryland Department of Environment
1800 Washington Boulevard, Suite 430
Baltimore, MD 21230
Attn: Conowingo Dam WQC

Re: Comments of the National Hydropower Association Relating to the Section 401
Conowingo Dam Water Quality Certification

To whom it may be concerned:

The National Hydropower Association (“NHA”) is a non-profit national association dedicated to securing hydropower as a clean, carbon-free, renewable, and reliable energy source that provides power to an estimated 30 million Americans. Its membership consists of more than 300 organizations, including public and investor-owned utilities, independent power producers, equipment manufacturers, and professional organizations that provide legal, environmental, and engineering services to the hydropower industry.

NHA promotes innovation and investment in all waterpower technologies, including conventional hydropower, marine and hydrokinetic power systems, and pumped storage hydropower to integrate other clean power sources, such as wind and solar.

NHA appreciates the opportunity to submit the following comments on the Section 401 Conowingo Dam Water Quality Certification.

Comments in Support of Conowingo Dam

Equal parts power plant, wildlife sanctuary and scenic destination for local and international visitors, the Conowingo Dam (“facility”) has been an engineering marvel and Maryland’s most iconic hydropower generating station for nearly 95 years. The facility remains as one of the largest non-federal hydropower projects in the nation and Maryland’s largest source of renewable energy. The facility’s continued operation is critical to meeting Maryland’s carbon-free generation goals. Conowingo Dam avoids 867,000 metric tons of carbon emissions each year, or the equivalent of taking 186,000 cars off the road annually.

In 2021, the facility generated over 2 million megawatt-hours of power. That is almost as much energy as all other renewable energy sources in the state combined, according to data from the federal Energy Information Administration. With a 572-megawatt capacity, it produces enough energy to power approximately 165,000 homes. Equally impressive, Conowingo has the flexibility to generate power after sunset and when the wind isn’t blowing.

In addition to its role in Maryland’s clean energy future, the Conowingo Dam is also a beloved recreational destination. In many ways, hydropower is more than just clean energy. The dam is



known around the world as a premier destination for eagle-watching, and a local hot spot for anglers, boaters and hikers. These recreational opportunities attract visitors from near and far and provide a significant boost to the local economy including more than \$21 million in tourism tax revenue for Cecil and Harford counties in 2018 alone.

The facility provides these clean energy and recreation benefits without producing any carbon, air or water pollution. As a matter of fact, if the Conowingo Dam didn't exist, all the same upstream pollution and debris would still flow into the Chesapeake Bay, except that it would do so faster and without obstruction.

Constellation Energy, the dam's operator, has committed more resources to maintaining the health of the Chesapeake Bay than any other private entity in the Susquehanna River watershed. However, a single facility at the very end of the river cannot be expected to shoulder the responsibility of cleaning up all the pollution and debris created by other sources throughout the entire 27,500-square mile watershed. All of us have a shared interest — and responsibility — to protect the environment and preserve the watershed and the Chesapeake Bay for generations to come.

The facility, and Constellation Energy, are not the source of pollution in the bay, but the existing agreement continues to be a big part of the solution. NHA respectfully requests that the Maryland Department of the Environment issue the Section 401 Water Quality Certification so that the Conowingo Dam can continue to reliably serve carbon-free electricity for Marylanders for generations to come.

Respectfully submitted,

/s/ Michael Purdie

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