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# Greenhouse Gas Reporting Program: Earthjustice Petitions U.S. Environmental Protection Agency to Add Dams/Reservoirs as a Source Category

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Earthjustice filed a March 21st Petition before the United States Environmental Protection Agency ("EPA") on behalf of 130 groups requesting that dams and reservoirs be added as a source category under the Greenhouse Gas Reporting Program ("GHGRP").

Earthjustice requests that EPA exercise its authority under Section 114(a)(1) of the GHGRP and the Administrative Procedure Act to initiate such a rulemaking.

EPA's GHGRP tracks facility-level emissions from the larger source of greenhouse gas ("GHG") emissions in the United States. The program requires reporting of greenhouse gas data and other relevant information from GHG emission sources, fuel and industrial suppliers along with CO2 injection sites. Approximately 8,000 facilities are currently required to report their emissions annually. EPA makes the reported data available to the public in October of each year.

Earthjustice's Petition argues that scientific studies have established that dams and reservoirs produce and emit substantial amounts of CO2, methane, and nitrous oxide. Cited as GHG emission sources are reservoirs surface emissions. They are stated to occur when dams trap organic material and leached synthetic fertilizers that decompose beneath a reservoir's water.

The Petition also describes dam and reservoir GHG emission points as including:

- Hydropower turbines
- Spillways
- Downstream water discharges

Cited as examples are Hoover Dam and Lake Mead. It is asserted that they emit approximately 12.3 million metric tons of CO2 equivalent annually. It is further stated that the emissions include 3.1 million metric tons of CO2 attributable to hydropower infrastructure and generation.

Earthjustice argues that there is a lack of awareness regarding GHG emissions from these types of facilities. Therefore, the organizations believe:

- Governmental agencies and utilities make decisions regarding compliant policies based on incomplete information/mistaken assumptions regarding dams and reservoirs

- Federal agencies do not assess dam and reservoirs' GHG emissions when addressing proposed water supply projects

As a result, Earthjustice contends that requiring dams and reservoirs to report their GHG emissions will ensure that governmental agencies and utilities have access to the best available information regarding GHG emissions.

Components of the Petition include:

- Statutory and Regulatory Background
- Factual Background Regarding GHG from Dams and Reservoirs
- Dams, reservoirs, and hydropower facilities in the United States
- Methane, carbon dioxide, and nitrous oxide are key drivers of the climate change crisis, yet greenhouse gas emissions from dams and reservoirs are often overlooked
- Multiple peer-reviewed scientific studies show that dams and reservoirs directly emit substantial amounts of methane and carbon dioxide annually
- Current scientific studies underestimate the full scope of dams and reservoirs' GHG
- Federal agencies, states, utilities, and other stakeholders often incorrectly assume and state that dams and reservoirs have no greenhouse gas emissions
- Adding dams and reservoirs to the GHGRP will result in better informed U.S. climate policies by ensuring that dams and reservoirs' GHG emissions are no longer underreported and ignored
- Adding dams and reservoirs to the GHGRP will help prevent the ill-informed expansion of hydropower based on the mistaken assumption that hydropower is a carbon-free electricity source
- Adding dams and reservoirs to the GHGRP will assist the United States in achieving its Global Methane Pledge
- Adding dams and reservoirs to the GHGRP will further the program's underlying principles
- Dams and reservoirs meet the definition of a "facility" under the GHGRP, and EPA may consider subcategories and determine the GHG calculation methodology in a future rulemaking
- Attachment 1: Bibliography of Scientific Studies
- Attachment 2: Mark Easter, Greenhouse Gas Emissions from Dams and Reservoirs in the United States (2022)
- Attachment 3: List of Cited Documents and Sources Provided to EPA

A copy of the Petition can be downloaded [here](#).