

Franklin PUD

This letter and background information is submitted on behalf of Franklin PUD. Please see attached.

March 26, 2019

Washington State Department of Ecology
Ms. Becca Conklin
PO Box 47600
Olympia, WA 98504-7600

Subject: Public Comment on U.S. EPA proposing to issue National Pollutant Discharge Elimination System (NPDES) permits to nine federal dams and requests State 401 water quality certification.

These comments are submitted on behalf of Franklin PUD. We believe in fact-based, scientific information regarding the Columbia Snake River hydro system. For over 20 years, there has been a relentless debate about the impact of the four Snake River dams despite the fact that fish and dams can and do co-exist. Since the 1970's billions of dollars have been spent on upgrades to the dams and programs to improve salmon habitat. The results are that salmon and steelhead runs are thriving – on average at 96% - compared to the numbers prior to when the dams were built in 1938. And the Corp of Engineers continues to be able to adjust water temperatures by pulling cold water out of the Dworshak storage reservoir, that has colder temperatures than run of the river rivers. They have added features to cool fish ladders to make it easier for fish passage. Their goal is to keep the fish thriving and the power running.

The Department of Ecology's attempt to exercise 401 certification powers under the federal Clean Water Act poses a serious threat to the continued usefulness of the Columbia and Snake River Dams. We believe that the formal comment period for the Columbia Snake River hydro system, NPDES water temperature permit certification, should be extended until appropriate measures and impacts on Washington state citizens can be analyzed. We have serious concerns about what Ecology views as appropriate measures and would like to see these before action is taken.

The Environmental Protection Agency has pulled their request for the 401 Certification, and we believe that the Washington State Department of Ecology should follow suit until such time that we have ample review of the situation and what is at stake.

The Columbia and Snake rivers are responsible for the livelihoods of thousands of farmers, port workers, longshoremen, fisherman, power users and many others. The dams create a river highway for shipping, provide recreational and tourism opportunities, and enable irrigation for some of the most productive agricultural land in the country. They should be managed by the experts who have the legal obligation to run them, including the Corp of Engineers, Bonneville Power Administration and NOAA Fisheries.

Thank you for the opportunity to comment. Franklin PUDs' interest is to ensure Ecology procedurally, publicly and scientifically approaches any regulation of water temperatures in a way that recognizes and protects endangered fish and other aquatic species while preserving the critical climate change, renewable energy and other multiple, critical benefits afforded by the federal hydropower and Columbia and Snake river systems.

Sincerely,

Roger Wright
Franklin PUD Commission President

Background

In 2015 there was a die-off of adult sockeye salmon returning via the Columbia and Snake rivers to their spawning grounds. Mother Nature, in the form of low river flows and unusually persistent, hot temperatures created a lethal situation for the fish. But it's clear that all the parties involved could have done more to help the fish in such an emergency.

Lessons Learned: Reservoirs and Dams

According to a recent "after action" report by NOAA Fisheries, dams and reservoirs actually played a positive role during the 2015 crisis by releasing vital colder water, which kept the sockeye situation from becoming even worse. Upstream storage reservoirs, including Grand Coulee and Canada's release of 5 million acre feet of colder water in the Columbia, and Brownlee on the Snake and Dworshak (pictured here) that feeds into the Snake, all had significant cooling effects— which helped offset higher temperatures in the rivers.

One critical "lesson learned" is that having emergency pumps available to tap into colder water in the reservoir bottoms should be examined. While the dams alone cannot correct for extreme weather conditions, more and better use of cold reservoir water can help reduce the impact of such conditions on the fish.

In the face of such extreme events, we need to take specific measures at the dams, such as shutting off spill operations and pumping cold water into the adult fish ladders. Just as importantly, as summer peaks hit, we need all the fisheries managers – federal, state and tribal — to act faster and more decisively, and for some to put salmon survival ahead of anti-dam agendas. Further the federal agencies that bear the ultimate management responsibility simply need to move forward with what they believe is best for the fish.

Although the Fish Passage Center (FPC) is charged with providing independent data on salmon passage and survival to fish managers and the Northwest Planning Council, it has a long and controversial history of agitating against the dams and hydropower. In contrast to NOAA Fisheries' even-handed evaluation, the FPC's 59-page "analysis" of the sockeye die-off is one-sided. Despite documented proof, the FPC refuses to acknowledge that the dams provided critical infusions of colder water during a crisis.

The good news is that a repeat of 2015 didn't occur in 2016, or since then. Each year's precipitation and snowpack is different. Yet we can't predict when low river flows and high water temperatures will conspire again to threaten the sockeye, or even the hardier Chinook and steelhead stocks. To be ready, we must consider operational alternatives at the dams and improve the ways in which we respond during a crisis.