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ASSOCIATION

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Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

RE: Columbia & Snake River Temperature TMDL Implementation Plan

To whom it may concern:

Thank you for the opportunity to provide comments on the Columbia & Snake River Temperature TMDL Implementation Plan.

Benton Rural Electric Association (Benton REA) is a consumer-owned electric cooperative serving more than 12,000 members across approximately 620 square miles of rural southeastern Washington, including portions of Yakima, Benton, and Lewis counties. Our service territory spans diverse terrain and includes many hard-to-reach areas where the cost and complexity of delivering reliable electric service is inherently higher than in urban or high-density service areas. As a not-for-profit public power utility, Benton REA's foremost responsibility is to provide safe, reliable, and affordable electricity to our member-owners.

We write to provide input on the implementation of the Temperature TMDL and respectfully suggest that the State of Washington's approach must address significant flaws and unresolved issues in the existing TMDL framework. In particular, implementation must reflect physical, hydrological, and operational realities of the Columbia–Snake River system and avoid imposing measures that would have adverse economic impacts or increase the cost of delivering power to our members.

WATER ENTERING WASHINGTON ALREADY EXCEEDS TEMPERATURE STANDARDS

Upstream waters entering Washington from Canada, Idaho, and other major tributaries routinely exceed Washington's temperature standards before they cross the state border. However, the existing TMDL does not meaningfully account for these upstream conditions when assigning responsibility or designing implementation measures.

The U.S. Environmental Protection Agency's 2021 TMDL analysis acknowledges this challenge, noting that:

"...where the rivers cross the upstream boundaries of the TMDL study area (Canadian border and the Washington/Idaho border), the water temperatures exceed the Washington water quality criteria by a substantial margin from June through September. The current water quality conditions present a significant challenge to achieving downstream water quality standards in Washington and Oregon."

Absent a realistic accounting of these upstream inputs, implementation of the TMDL risks mischaracterizing changes within Washington's portion of the system and assigning responsibility for conditions that are largely beyond in-state control. As the Department of Ecology develops its

implementation and enforcement framework, it should explicitly recognize these upstream influences and make appropriate accommodations to ensure outcomes are scientifically defensible and equitable.

THE HYDROPOWER SYSTEM MODERATES, RATHER THAN EXACERBATES, RIVER TEMPERATURES

The temperature standard underlying the TMDL does not reflect the historic and operational characteristics of the Columbia–Snake River system. Multiple studies demonstrate that the federal hydropower system functions as a thermal buffer, reducing temperature variability and moderating peak temperatures during the hottest months of the year.

Since the 1990s, cold-water releases from Dworshak Reservoir—implemented at the request of fisheries managers and sovereign tribes—have been used to cool river temperatures during critical fish migration periods. These actions demonstrate that the hydropower system has actively mitigated temperature challenges, particularly those driven by rising air temperatures associated with climate change.

As documented by John McKern, retired Fish and Wildlife Biologist for the U.S. Army Corps of Engineers, and by studies conducted by the Pacific Northwest National Laboratory and the U.S. Geological Survey, observed data show that impounded river systems generally exhibit reduced temperature variability and that present-day temperatures at key locations are not warmer than pre-impoundment conditions. Increases observed in certain periods are more closely correlated with regional air temperature trends than with dam operations.

These findings underscore the importance of ensuring that TMDL implementation is grounded in empirical evidence and does not rely on assumptions that conflict with long-term data.

AFFORDABILITY AND ECONOMIC IMPACTS MUST BE CENTRAL TO IMPLEMENTATION

Benton REA and public power utilities across the region are experiencing significant and sustained rate pressures due to increasing wholesale power costs, transmission expenses, and broader inflationary pressures. These challenges are particularly acute for rural utilities that must maintain extensive infrastructure over large service territories with relatively low customer density.

As a consumer-owned cooperative, Benton REA cannot support regulatory measures or implementation processes that would increase the cost of delivering electricity or impose additional financial burdens on our members. Any TMDL implementation strategy must carefully evaluate economic impacts, ensure cost-effectiveness, and avoid actions that would undermine affordability and reliability for rural communities.

Thank you again for the opportunity to provide comments on the Columbia & Snake River Temperature TMDL Implementation Plan. We urge the Department of Ecology to consider the scientific evidence, upstream conditions, and economic realities outlined above as it moves forward with implementation. Benton REA appreciates the Department's engagement and stands ready to participate constructively in future discussions.

Sincerely,

J. Lozano

Josh Lozano
Director of Energy Policy
Benton REA