



December 30, 2025

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 Implementation Plan. As a consumer-owned not-for-profit utility, Benton PUD exists solely to operate in the best interest of our customers. Benton PUD is a load following customer of the Bonneville Power Administration and serves over 58,000 meter connections and more than 130,000 customer-owners. Affordable, reliable, and environmentally responsible electricity is critical to their health, safety, and well-being. A TMDL implementation that does not account for analysis flaws will result in increased costs to customers and place the reliability of the regional grid in jeopardy. We respectfully suggest that the State of Washington's implementation must address significant flaws and other issues in the existing TMDL framework listed below.

Water coming into the State of Washington already exceeds the temperature standard

The Department of Ecology's TMDL implementation will not accurately reflect changes in the system if it does not include water entering from Canada, Idaho, and other significant tributaries known to produce warmer water. The EPA's 2021 TMDL analysis notes that the temperature of water crossing into Washington often exceeds the Washington water quality criteria by a substantial margin from June through September, which creates challenges for compliance downstream. The Department should recognize these realities and make appropriate accommodations to their enforcement approach accordingly.

The existing hydropower system plays a role in moderating river temperatures

The existing TMDL and the Department's current standard does not reflect the historic attributes of the Columbia-Snake River system. Multiple studies have demonstrated that the Columbia and Snake River Dams moderate temperature swings, reduce peak summer highs, and help stabilize river conditions during the critical summer months. Dworshak Reservoir – at the request of fisheries and sovereign tribes – has been used to lower temperatures during fish migration. These are not the actions of a system making things worse but rather evidence of a system actively mitigating temperature challenges.

Thank you again for the opportunity to provide comments in this process. We urge the Department of Ecology to consider this information as you move forward with the Columbia & Snake River Temperature TMDL Implementation Plan.

Sincerely,

A handwritten signature in blue ink that reads "Jon Meyer".

Jon Meyer
Sr. Director of Finance and Executive Administration
Benton PUD