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December 18, 2025

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

RE: Comments Submitted on Columbia and Lower Snake River Temperature Total Maximum Daily Load (TMDL).

To Whom it May Concern:

Public Utility District No. 1 of Franklin County (Franklin PUD), Washington, appreciates the opportunity to provide comments on the development and implementation of the Columbia and Snake River Temperature TMDL.

Franklin PUD provides electric service to nearly 30,000 customers throughout Franklin County, including the cities of Pasco, Connell, Kahlotus, and Basin City. Our customers depend on the clean hydro energy provided from dams located on the Columbia and Snake Rivers. This reliable, affordable, and low-carbon power is essential to our customers and to the economic and environmental well-being of our communities.

We have deep concerns about the approach taken by the Biden Administration in formulating the TMDL and about analytical flaws that result from that approach. A temperature TMDL that does not account for analysis flaws could result in even more regulation and pressure on the hydropower system. At a time when every megawatt is essential in the region, more questionable regulations are not the answer the region is seeking.

We would like to provide the following comments:

- 1. Water coming into the State of Washington already exceeds the temperature standard.** Waters flowing from Canada, Idaho, and other upstream tributaries are already warmer during summer months, yet the TMDL does not meaningfully incorporate these upstream conditions into its analysis or compliance framework. 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. An implementation strategy that fails to account for incoming water temperatures risks misattributing responsibility and producing outcomes that do not reflect actual conditions in the river system.
- 2. The role the existing hydropower system plays in moderating river temperatures is not recognized sufficiently.** Multiple studies over several decades show that the Columbia and Snake River reservoirs act as thermal buffers, reducing temperature

variability and limiting extreme temperature spikes during the hottest periods of the year. Since the 1990s, cold-water releases from Dworshak Reservoir, made at the request of fisheries managers and sovereign tribes, have been used specifically to reduce river temperatures during critical fish migration periods. These actions demonstrate that the hydropower system has been used as a tool to mitigate, not exacerbate, temperature challenges driven largely by increasing air temperatures.

The Washington State Department of Ecology now has an important opportunity to recognize and address these issues as it develops the TMDL.

There is much historical data indicating that peak summer water temperatures in portions of the Snake River were as high or higher prior to dam construction, and that long-term temperature trends are closely correlated with regional air temperature increases rather than hydropower operations. It is important to take this information into account when evaluating both responsibility and effectiveness under the TMDL.

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

Respectfully,

A handwritten signature in black ink, appearing to read 'Victor Fuentes', with a stylized flourish at the end.

Victor Fuentes
General Manager/Chief Executive Officer
Franklin Public Utility District

c: Central Files

LTR 2025-154