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Inland Power and Light Company

Dec. 22, 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 comment on the Columbia and Snake River Temperature TMDL Implementation Plan. Inland Power appreciates the chance to share our perspective on this important issue.

We believe the state of Washington's implementation approach must address key shortcomings in the existing TMDL to ensure a fair and effective process.

Upstream Conditions Already Exceed Temperature Standards
The Washington Department of Ecology sets the general water temperature standard at 68ºF for the Columbia and Snake Rivers. These standards vary by river segment, designated use (spawning), and time of year. Water entering Washington from Canada and other upstream sources routinely exceeds temperature standards before crossing our borders. The current TMDL does not adequately account for these conditions.

The EPA's 2021 analysis acknowledges this challenge:
"…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."
Any implementation plan that ignores these upstream realities will fail to reflect actual system conditions, leading to inaccurate conclusions. We urge the Department of Ecology to incorporate these factors and adjust enforcement strategies accordingly.

Hydropower Helps Stabilize River Temperatures
When it comes to river temperature stabilization, the hydropower system is part of the solution. The Columbia-Snake River system has changed over time, and the role of hydropower in moderating temperatures cannot be overlooked. Studies show that dams act as thermal buffers, reducing temperature spikes during the hottest months. According to John McKern, a retired Fish and Wildlife Biologist with the U.S. Army Corps of Engineers, "The water temperature situation changed in the early 1990s when the Fish Passage Center representing the fishery agencies and Tribes requested cold

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water releases from Dworshak Reservoir on the Northfork of the Clearwater River. Their expressed purpose was to cool off the lower Snake River water temperatures for juvenile and adult fish migrations. For decades, the Corps of Engineers has endeavored to keep the lower Snake River water temperature below 68°F, if possible, by releasing 50 to 55°F (Spalding Gage) water from Dworshak Reservoir."

These cold-water releases from Dworshak Reservoir—requested by fisheries and tribes—have been used to cool river temperatures during fish migration. These actions demonstrate a system working to mitigate temperature challenges, not worsen them.

Historical data reinforces this point:

- Before dams were built, in the 1950s, Snake River temperatures reached 83°F. After dam construction, peak temperatures dropped and remained lower than pre-impoundment levels. McKern states, "…In 1953, before the first of the USACE dams were built on the lower Snake River, water temperatures were recorded reaching 83°F at the mouth of the Snake River. In a mid-1950s study, it reached up to 77°F. When Ice Harbor Dam went into operation (1961), a continuous record of water temperature became available. Highest summer temperatures never exceeded 77°F even after Lower Monumental (1969), Little Goose (1970) and Lower Granite (1975) impounded reservoirs upstream…" He goes on to explain that instead of increasing water temperatures, the lower Snake River dams reduce temperature volatility by passing warm water pockets downstream, reservoir by reservoir.
- As stated above, cold-water releases from Dworshak have helped maintain temperatures near 68°F during critical migration periods.
- The Pacific Northwest National Laboratory's study confirmed that reservoirs reduce temperature variability compared to an un-impounded river. (*Regional Scale Simulation of Water Temperature and Dissolved Gas Variations in the Columbia River Basin* (2002)).

These facts matter. As stated above, the hydropower system is part of the solution, not the problem.

Thank you again for the opportunity to provide input. Inland Power urges the Department of Ecology to consider these realities as you move forward with the Columbia and Snake River Temperature TMDL Implementation Plan.

Sincerely,

Jasen Bronec, CEO
Inland Power & Light