

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:

Public Utility District No. 2 of Grant County, Washington (Grant PUD) appreciates the opportunity to submit comments on the Department of Ecology's (Ecology) Columbia & Snake River Temperature Total Maximum Daily Load ("TMDL") Implementation Plan. Grant PUD owns and operates two hydroelectric dams on the Columbia River, Wanapum and Priest Rapids, known collectively as the Priest Rapids Hydroelectric Project (PRP). Grant PUD provides electrical service to more than 55,000 meters across Grant County, serving a diverse customer base that includes households, small businesses, farms and other agricultural operations and a variety of industrial customers.

For over sixty years, the PRP has stood as the driving economic force behind Grant PUD's ability to serve our county residents and businesses. Our mission is to safely, efficiently, and reliably provide electric power and fiber optic broadband services to our customers, and one of our key objectives is to operate responsibly and protect the natural and cultural resources the public entrusts to us. As such, we share Ecology's commitment to managing Washington's water resources consistent with law and science.

Since the early 2000s, Grant PUD has been implementing its environmental stewardship obligations under the terms and conditions of its Federal Energy Regulatory Commission (FERC) Hydroelectric License No. P-2114,¹ Priest Rapids Salmon and Steelhead Agreement (SSSA; Grant PUD 2006), 2008 NOAA-Fisheries Biological Opinion (BiOP, NOAA 2008), 2007 USFWS BiOp (USFWS 2007), 401 Water Quality Certification (WQC; Ecology 2007) and has achieved and is maintaining a No-Net-Impact (NNI)² standard for salmon and steelhead migrating through the PRP. Through achieving the NNI standard, Grant PUD and the signatories to the SSSA³ have used the most current and best available scientific information and analysis as the standard of care (Section 4.2 of the SSSA) to implement the suite of environmental stewardship obligations for the PRP.

¹ 123 FERC ¶ 61,049 (2008).

² No-Net-Impact (NNI) is defined as the condition whereby the Priest Rapids Project does not produce unmitigated project-related mortality.

³ Signatories to SSSA include NOAA-Fisheries, US Fish and Wildlife Service, Washington Department of Fish and Wildlife, Yakima Nation, Confederated Tribes of the Colville Reservation and Grant PUD.

Grant PUD is actively engaged in Ecology’s Columbia and Snake River Implementation Plan regional advisory committee and is collaboratively working with Ecology staff and the Priest Rapids Fish Forum (PRFF) to develop a Water Quality Attainment Plan (WQAP) for the PRP. On October 20, 2025, Grant PUD submitted its WQAP Compliance Schedule (WQAP-CS), which was approved by Ecology on October 22, 2025. Per the approved WQAP-CS, Grant PUD intends to submit its draft evaluation criteria to Ecology for review on December 31, 2025, to complete its first developmental task on schedule.

1. Grant PUD Support of Northwest Public Power Association Comments

As a member of the Northwest Public Power Association (“NWPPA”), Grant PUD fully supports and endorses the comments submitted by the NWPPA.

2. Grant PUD Support of Northwest River Partners Comments

As a member of the Northwest River Partners (“NWRP”), Grant PUD fully supports and endorses the comments submitted by the NWRP.

3. Use of best available scientific information NOT fully included in TMDL Implementation Plan

As Grant PUD works collaboratively with Ecology towards development of a WQAP for the PRP, Grant PUD is concerned that the best available scientific information and analysis are not being used to implement the temperature TMDL for the Columbia and Snake Rivers since it does not take into consideration upstream temperature inputs from Canada. In fact, in the Environmental Protection Agency (EPA) 2021 TMDL analysis, the EPA, when discussing water temperatures in the Canadian portion of the Columbia River, clearly identified that:

*“The water temperatures exceed the Washington water quality criteria by a substantial margin from June through September...” and “the current water quality conditions **present a significant challenge to achieving downstream water quality standards in Washington and Oregon.**” (EPA 2021; emphasis added).*

Although EPA’s TMDL acknowledges this fact, it is not accounted for in Ecology’s plan, which requires hydropower operators like Grant PUD to develop and ultimately implement WQAPs. This admission underscores that the current process for developing a temperature TMDL for the Columbia and Snake Rivers lacks sound scientific basis and analysis and further illustrates the significant challenge Washington State faces in meeting its own water quality standards. Simply imposing downstream temperature regulations will not address the root cause for water temperatures increases (e.g. upstream inputs, regional climate warming, etc.). Furthermore, Grant PUD asserts that the current process overlooks evidence showing hydroelectric projects may actually reduce peak summer temperatures and moderate temperature fluctuations, as documented by independent experts and supported in scientific literature (NOAA 2020, PNNL 2002, and USGS 2003).

In addition to not accounting for upstream temperature impacts, the EPA TMDL analysis (EPA 2021) does not account for the impacts of climate change. In EPA's analysis (EPA 2021), they identify that the impacts of climate change are imbedded in model outputs for current temperatures (Section 6.8), which suggests difficulty discerning the true contribution of dams on water temperature versus direct impacts from climate change. This again underscores that the current process for developing a temperature TMDL for the Columbia and Snake Rivers lacks sound scientific basis and analysis and further illustrates the significant challenge Washington State faces in meeting its own water quality standards.

Grant PUD is deeply concerned that Ecology's TMDL Implementation Plan will impose system-wide cumulative impact obligations on downstream entities, creating unfair burdens for Grant PUD customers and placing arbitrary regulatory requirements on parties not responsible for water temperature impacts.

Grant PUD respectfully requests that Ecology apply the same guiding principles used by Grant PUD and other SSSA signatories to achieve the NNI standard for the PRP, while continuing to collaborate with Grant PUD to ensure its customers are not held accountable for conditions beyond its control and that the implementation plan accurately reflects the influence of regional climate warming and upstream inputs.

We value the opportunity to contribute to this important implementation plan and remain committed to working collaboratively toward shared environmental goals. Please feel free to contact me if you have any questions, need additional information, or would like to discuss our comments further.

Sincerely,

Ross Hendrick

Ross Hendrick
Director – Environmental Affairs

Literature Cited

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