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Upstream Conditions Exceed Temperature Standards

Water entering the State of Washington from upstream Canadian and domestic rivers routinely exceeds the temperature standard before it reaches the Washington border. The current TMDL fails to account for these conditions in a meaningful way.

- Water Quality Standards for Washington, Idaho, and Oregon differ: Idaho's standard is the least restrictive at 22° C, while Washington's is 20° C, and Oregon's is 17.8° C. The Snake River McDuff Rapids gauge at USGS 13317660 (RM 175.7), measured on the Idaho side, but land on the other side of the river is in Washington. This gauge on the Snake River is within one mile of Washington, Idaho and Oregon borders. The water is the same, but depending upon which standard is used, it can be in and out of compliance at the same time.

- Prior studies by EPA of the Columbia and Lower Snake River Temperature Total Maximum Daily Load (TMDL) were incomplete and thus, failed relating to causation: On May 18, 2020, EDA sought comments on an analysis touted to cover almost 900 river miles. This analysis began at the lower Snake River at the confluence of the Clearwater and Snake River (or RM 167.5—Anatone Gauge, USGS 13334300), when a more meaningful examination of the root cause could have been determined by including water temperature data analysis of Brownlee, Oxbow, and Hells Canyon dams (the latter being USGS 13290450 at Snake RM 247) as well as the McDuff Rapids gauge. Then inputs from the free-flowing Salmon and Grand Ronde rivers could be better understood, as well as the very highly impactful ambient temperatures within the roughly 80-mile undammed section of the river called Hells Canyon dam. (This is named for the very high summer ambient temperatures, which are increasing due to climate change and are impacting water temperatures.) As a result of the incompleteness of prior studies, removal of the four lower river dams is cited as one solution, even though only 9 or the 13 threatened or endangered species would be impacted.

Without adequate consideration for actual upstream conditions, any implementation plan will impose punishing conditions on facilities and public partners to little effect.