

GRUEN David * DEQ

From: Miles Johnson <miles@columbiariverkeeper.org>
Sent: Friday, March 13, 2026 4:19 PM
To: GRUEN David * DEQ
Subject: Temperature WQMP (and related matters)

Hi David,

Sorry I was not able to get these thoughts to you by March 3; no worries if they don't make it into the next round of materials.

I appreciate DEQ's work on this, and from what I can tell by the discussion in the last meeting and the draft WQMP you shared, I think it's headed in a good direction. Obviously, the final WQMP will need more specific requirements than the draft contains, but I imagine that's part of the process we are working through.

CRK is very supportive of DEQ's proposal to make the Corps a Designated Management Agency in the WQMP and, broadly speaking, to task the Corps with coming forward with an implementation plan for meeting water quality standards that looks at what each dam could do operationally, as well as how the system of dams collectively might reduce temperatures. I don't think it helps to go too far into the details of what that might look like here; the WQMP lays out a pretty comprehensive list of possibilities. I'll note that DEQ's October 8, 2021, letter to EPA regarding the NPDES permits for the Lower Columbia Dams also lays out a more detailed study and implementation plan request that could become a foundation for what the WQMP asks of the Corps.

On a related note, I'm aware that the Portland District of the Corps has or will soon submit the WQAPs for the Lower Columbia Dams. I'm hopeful (perhaps foolishly) that the Corps explain its proposed approach to temperature reduction generally, but also how it intends to meet the specific requirements of OR's WQS addressed in the NPDES permit. I'm sure you'll be reviewing those carefully, and I'd be happy to touch base about any issues you see before DEQ does or does not approve those conditions of the WQAPs.

Hope you have a good weekend,
Miles

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