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Via Email: David.Gruen@deq.oregon.gov

Mr. Gruen,

On behalf of the Northwest Sportfishing Industry Association (NSIA), thank you for the opportunity to participate in the Columbia River Temperature Water Quality Management Plan Local Advisory Group and to provide comments on the Draft Water Quality Management Plan for the Lower Columbia and Snake River Temperature TMDL.

It is well documented that the single greatest source of human-caused mortality for Columbia and Snake Basin salmonids is the hydro system. The dams and their reservoirs delay smolt travel to the ocean and adult returns to natal streams, not just by days but by weeks. Without adequate flows and spill, juvenile salmon and steelhead are exposed to turbines and bypass systems, increased predation, prolonged periods of elevated temperatures, interference with smoltification, and disease. Delayed adult passage likewise increases exposure to predators, disease, and temperature pollution.

According to the Draft WQMP, "EPA's analysis of the relative contributions of excess heat from allocated sources demonstrates that the cumulative nonpoint source heat loading from dam impoundments has a substantially greater impact than point sources and tributaries." NSIA agrees that the greatest opportunity to reduce temperature pollution lies in changes to the operations and infrastructure of the mainstem Columbia and Snake River dams. Additional information regarding the relationship between temperature and water travel time can be found in Document 39-25, **Impact of WTT on Water Temperatures in the Lewiston to Ice Harbor Dam Reach and the McNary to Bonneville Dam Reach**, and Document 27-26, **Impact of Water Transit Time (WTT) and Flow on Water Temperatures in the Lewiston to Ice Harbor Dam Reach and the McNary to Bonneville Dam Reach**.

We support the dam management strategies outlined in Section 2.1 of the Draft Plan to reduce the temperature loading created by large reservoirs and slow-moving water. These actions include "reduction in water withdrawals, coordination with upstream mainstem Columbia River dams to reduce water temperature flowing into dam reservoirs, changes to flow routing through dams, lower minimum operating pool elevations, reservoir drawdown or dam breach, and installation and operation of structural improvements."

In combination with other measures, NSIA anticipates that operating many of the larger reservoirs at minimum operating pool (MOP) during specific times of the year will be necessary

to achieve and maintain the temperature water quality standards in the mainstem Columbia River in Oregon. We strongly support a feasibility study to investigate drawdown of John Day reservoir to minimum operating pool (MOP) as this is the largest, longest, most lethal reservoir in the system. We suggest a priority and timeline for this action.

The NOAA Rebuilding Plan identified breaching of the four Lower Snake River Dams as a centerpiece action for recovery of ESA-listed stocks of salmon and steelhead. Additionally, the EPA temperature model demonstrated that without the four Lower Snake River Dams in place, the Snake River would have been cool enough for fish to migrate without the significant fish kill that occurred in 2015. A Columbia and Lower Snake Rivers Temperature WQMP must look at this measure.

In Table 4. List of responsible persons including designated management agencies, NSIA suggests the addition of the Bureau of Reclamation and the Bonneville Power Administration.

Thank you for allowing us to participate in the Columbia R. Temperature WQMP Local Advisory Group meetings. Reach out if we can be a resource in any way.

A handwritten signature in purple ink that reads "Liz Hamilton". The signature is written in a cursive, flowing style.

Liz Hamilton, Policy Director
Northwest Sportfishing Industry Association