May 15, 2026

Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR, 97232

Re: Water Quality Management Plan—Columbia and Lower Snake Rivers Temperature TMDL Implementation Plan

To Whom It May Concern:

Thank you for the opportunity to provide comments and feedback on the Water Quality Management Plan (WQMP) for the Columbia and Lower Snake River Temperature Total Maximum Daily Load (TMDL).

PNWA has over 150 members, including ports, barge companies, steamship operators, grain elevator operators, agricultural producers, electric utilities, irrigation districts, and union labor throughout Washington, Oregon, and Idaho. Our association supports projects to advance and protect the region's navigation infrastructure, freight mobility, economic health, and the environment. We support the region's multi-modal transportation system, which provides safe, efficient, and reliable links to competitive domestic and world markets.

Since 1934, we have not only advocated for the development of infrastructure, navigation, irrigation, electric power, and irrigated agriculture on the Columbia-Snake River System, but also to protect our region's environment. PNWA supports projects to remove toxins from the Columbia Snake River Basin, improve salmon spawning habitat in tributaries, predator abatement, culvert removal, and programs to incentivize port facility modernization and emissions reduction in the maritime transportation system.

Like the State of Oregon and our colleagues on the TMDL Advisory Panel, we care deeply about the health and future of the Columbia-Snake River system, as it not only provides immense economic and energy benefits to our region, but also helps protect the region's environment for the future.

However, we respectfully suggest that the State of Oregon's WQMP address considerable flaws and other issues within the existing TMDL before full implementation.

The TMDL Does Not Include all the Best and Relevant Information and Should be Updated to Reflect an Accurate TMDL.

The TMDL for the Columbia-Snake River System was finalized in 2021 by the Environmental Protection Agency (EPA). The EPA's initial 2021 report states it evaluated temperature impacts from:

> "…(1) point source discharges of heat subject to the National Pollutant Discharge Elimination System (NPDES) permits, (2) nonpoint source heat loading from dams and reservoirs that alter water temperatures within their reservoirs and in downstream river reaches; (3) tributary inflows to the mainstems of the Columbia and lower Snake Rivers that are affected by upstream point and nonpoint sources; (4) increasing air temperatures and other factors associated with climate change; (5) cold water releases from Dworshak Dam in Idaho; (6) agricultural water withdrawals from the Banks Lake project; and (7) water temperatures in the mainstems of the Columbia and lower Snake Rivers where they enter into Washington from Canada and Idaho, respectively (4.0, Source Assessment, pg. 33, 2021)."

However, the 2021 report also provides evidence that certain integral temperature impacts, such as the effects of climate change and water quality from areas upstream, were not included in the study. The report states, "Climate change impacts have not been assigned allocations in this TMDL. As discussed in Section 4.3, climate change effects are estimated to have caused instream temperature increases of 1.5°C ± 0.5 in the TMDL area since the late 1960's" (6.8, Water Quality Criteria Attainment and Excess Temperature, pg. 83, 2021)."

The EPA's 2021 TMDL Report directly identifies climate change and water temperatures from Idaho and Canada as direct contributors to increased water temperatures in the Columbia River, yet fails to assign them as a point-source temperature allocation or provide any meaningful next steps to take. Since identifying climate change as a major heat source, the EPA should include it as a temperature allocation within the study and come up with measures to address it. By not including these important point-source allocations, this shifts additional responsibility and undue burden to Designated Management Agencies (DMAs) and other stakeholders in the WQMP.

The EPA must revise the current Columbia-Snake River TMDL to include important heat allocation measures, such as climate change's impact on water quality, and provide meaningful recommended actions for the federal government to take. A revised TMDL ensures the WQMP reflects accurate information and appropriate action to be taken by all responsible parties.

The Current Proposed Solutions for Dam Management Strategies are Not Feasible for Timely Implementation and Pose Risks to Navigation Safety.

The draft WQMP provides proposed management strategies to meet the waste load allocation requirements in the Columbia and Lower Snake River TMDL. Under Section 2.1, "Nonpoint Source Dam Management Strategies", the WQMP provides a list of management strategies,

operational changes, and structural improvements to consider. The WQMP provides suggestions, such as:

> "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, installation and operation of structural improvements, such as: selective withdrawal systems, mechanical chillers, thermal curtains, artificial shading devices or structure, airlift/upswelling mixing systems, geothermal heat exchangers, evaporative cooling towers, managed aquifer recharge, and spraying/misting" (2.1 Nonpoint source dam management strategies, pg. 11, 2026).

We have concerns that some of these proposed solutions pose risks to navigation safety and may affect water temperature, which is already out of compliance when it reaches Oregon's waters. Several of our members who are seasoned tug operators identify heightened risks when pool elevations are lowered and when increased flow routing regimes are implemented – creating cross currents and strong eddies.

In addition, proposed operational changes such as lowering Minimum Operating Pools "MOP," pose moderate to significant risks to navigational safety. USACE receives its authority under Section 2 of the River and Harbors Act of 1945 (Public Law [PL] 79-14), which states the minimum operating pool and navigation channels are authorized to be 14 feet deep by 250 wide on the inland Columbia-Snake River system. Although the MOP suggestions are in place, Corps staff, along with those who navigate the river system, are concerned about orders to reduce MOP. Reducing MOP operating range risks vessels running into shoaling and shifting rocks in such a dynamic river, reducing clearance under tow and presenting significant risk of damage.

In some cases, some vessels have just inches of clearance, making navigation stressful and impairing navigation efficiency. For vessels to navigate the channel, they must maintain adequate clearance. If the federally authorized channel depth cannot be maintained, vessels would then be 'light loaded', and cargo would be left on the dock. This severely impacts shippers, farmers, and the marketability of commodities throughout our region, along with leading to delays at locks.

Concerned Regarding Funding Capacity for Proposed WQMP Solutions

The Draft WQMP identifies the U.S. Army Corps of Engineers (USACE) as a Designated Management Agency (DMA), which are responsible for developing and executing an implementation plan specific to the Columbia and Lower Snake Rivers' Temperature TMDL. Under Section 5.3.6, "Implementation Costs and Funding," the WQMP states:

> "DEQ expects each DMA to provide a fiscal analysis of the resources needed to develop, execute and maintain the programs and projects described in implementation plans. This analysis should be in five-year increments to estimate costs, demonstrate sufficient funding is available to begin implementation, and identify potential future funding sources to sustain management strategy implementation" (Section 5.3.6, Implementation Costs and Funding, pg. 19, 2026).

The Draft WQMP does not seem to recognize the annual federal funding process governing USACE. As a federal agency, USACE receives its funding through the annual Congressional Appropriations process, which makes it difficult to meet DEQ's expectations for identifying both initial funding and reliable long-term funding sources. The appropriations process begins with the release of the President's budget, which provides funding level recommendations for all federal agencies for the upcoming fiscal year. Once Congress receives the President's recommendations, each chamber drafts their own respective budgets as appropriations bills, which are then conferenced and signed into law by the President.

However, funding recommendations from the President and Congress are always subject to change. Funding recommendations included in the President's budget might not be included by Congress in the final appropriations bill. Congress also has the power to change previously allotted budget allocations for government agencies through the reconciliation bill process. Simply put, the appropriations process cannot be projected, as priorities change under different administrations, making federal funding for projects unpredictable.

Compounding these challenges is the increasing reliance on continuing resolutions (CRs) and the risk of government shutdowns, which do not allow for new starts until the next fiscal year's funding is in place. If a full year CR is in place, then this will delay any new projects until the next fiscal year. This makes compliance to identify sufficient available funding along with providing a five-year financial outlook impossible for federal agencies.

Finally, recent federal priorities have emphasized the need to reduce federal spending. As a result, funding for existing infrastructure, operations, and maintenance projects in the Pacific Northwest has been reduced or, in some cases, eliminated. Given these constraints, securing additional funding for new projects proposed under the WQMP is uncertain and unlikely.

Water Temperatures Coming from Outside Areas Already Exceed the Water Quality Standard, Making the Current Draft WQMP Unattainable.

ODEQ's Draft WQMP refers to the Columbia and Lower Snake River Temperature TMDL, which covers the entirety of the mainstem Columbia River in Oregon, which is located from river mile 0, to river mile 309. However, waters coming from both the Upper Columbia and Snake Rivers from Canada and Idaho are identified to routinely exceed the allotted temperature maximum before even reaching the Oregon state border.

The EPA's 2021 TMDL analysis notes, "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" (6.4, Boundary Conditions, pg. 49, 2021).

The water temperature entering Washington is already higher than the temperature threshold set by the state. This demonstrates that even if there were no dams throughout Washington and Oregon, water temperatures entering the state would already exceed the water quality threshold. This adds an undue burden to the DMAs throughout Washington and Oregon to achieve water quality standards and puts these stakeholders at a disadvantage.

For a more actionable WQMP, collaboration and input from Idaho and Canada are essential. Establishing consistent TMDL standards and implementation strategies across all contributing regions will be necessary to achieve meaningful water quality improvements.

Conclusion

PNWA appreciates the opportunity to provide our perspective on the draft WQMP, in addition to our participation on the advisory board. PNWA believes that incorporating the feedback above will make ODEQ's WQMP stronger, cohesive, more achievable, and better for all stakeholders.

Respectfully submitted,

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Executive Director
Pacific Northwest Waterways Association