

GRUEN David * DEQ

From: Sherrie Duncan <duns@yakamafish-nsn.gov>
Sent: Friday, May 15, 2026 1:10 PM
To: GRUEN David * DEQ
Cc: Tom Iverson; Keely Murdoch
Subject: Re: Columbia R. Temperature WQMP - Deadline for comments extended until May 15

Hi Dave,

Thank you for the opportunity to review the ODEQ's draft WQMP. Below is a list of the high-level concerns identified during our review.

Please note that we intend to submit a formal comment letter after reviewing the revised WQMP draft.

Feel free to reach out if you have any questions.

Thanks,

SD

High-Level WQMP Concerns

- The WQMP doesn't match the urgency of salmon recovery and lacks near-term (5–10 year) accountability for making measurable temperature improvements.
- The plan defers a lot of the substance to future implementation plans and doesn't clearly establish how anything will be enforceable, either at the individual level or cumulatively across all responsible parties.
- Designated Management Agencies have roles identified, but there's no mechanism to make sure they do the work and no clear consequences if they don't.
- Timelines are inconsistent and vague, especially for dam-related actions, and there aren't clear deadlines or triggers that force action if things aren't working.
- The adaptive management approach is underdeveloped. There aren't clear timelines, performance metrics, or requirements for what happens if strategies don't produce results.
- The plan calls out a systemwide approach, but there's no explanation of how priority reaches, cold water refuges, and thermal migration corridors are tied together or managed in a coordinated way.
- There's no mapping or identification of priority areas and reaches to help drive restoration and protection in a strategic way.
- Cold water refuges are mentioned, but there's no call to protect, restore, or maintain them, and no explanation of how Oregon's cold water refuge narrative criteria will be met through this plan.
- Dam operations and reservoir releases don't seem to be treated like the major heat sources that they are. For example, federal action agencies (U.S. Army Corps of Engineers, Bureau of Reclamation, Bonneville Power Administration) should evaluate John Day reservoir drawdown as a temperature mitigation tool to address mainstem cumulative temperature.
- The list of Designated Management Agencies is incomplete and should include other dam owners and operators (e.g., Bureau of Reclamation, Mid-Columbia PUDs, and likely others upstream, including the Snake River).

- There is no coordinated, sector-specific approach for dams. A joint implementation plan would help ensure shared modeling assumptions, coordinated evaluation of strategies, and avoid piecemeal actions that are not effective at the system level.
- The draft leans heavily on EPA's 2020 TMDL for the problem statement but does not summarize the severity of the temperature issue on its own.
- There is no funding mechanism or discussion of likely funding sources to support implementation or adaptive management.
- The accountability framework (e.g., biennial reporting) is not clear on how it will track what is working, where, and by how much, or how that information will be used to adjust actions.
- The plan does not explain how it will coordinate with ongoing efforts in Washington (e.g., WQAPs and TMDL implementation plans), which is a significant gap given the shared system.
- It is unclear how (or if) the WQMP will address the November 2023 spawning use designation below Bonneville Dam, especially given that it has not yet been approved by EPA.
- Tribal involvement appears limited to consultation and review, lacking a clear role in planning, implementation or adaptive management, despite Tribes having knowledge of where protection and restoration actions should be prioritized.

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On Wed, Apr 29, 2026 at 3:37 PM GRUEN David * DEQ <David.GRUEN@deq.oregon.gov> wrote:

Good Afternoon Advisory Group Members,

DEQ received and has granted a request to extend the May 1st, 2026 deadline to provide written comments on the pre-public draft of the Columbia River Temperature WQMP.

DEQ is providing a 14-day extension. **Written comments are due by May 15, 2026.**

Comments received by this date will be reviewed and considered by DEQ. In Summer 2026, we plan to release a draft WQMP for a formal public comment period. DEQ will submit a final WQMP to the DEQ Director as a DEQ Order.

Background:

Oregon has identified the Columbia River as impaired for high water temperatures on the state's Integrated Report, which details the conditions of the state's waters. In 2020, the EPA developed a pollution budget, known as a Total Maximum Daily Load or TMDL, to identify the sources contributing to hot water temperatures and to determine the maximum amount of heat the Columbia River can receive and still meet applicable state and tribal water quality standards. Oregon and Washington are responsible for implementing the required reductions in excess heat.

DEQ is in the early stage of developing its Water Quality Management Plan to address implementation of the TMDL as described in Oregon Administrative Rules 340-042-0040(4)(I). This plan will identify the entities responsible for reducing their contributions of excess heat to the river and will outline the strategy and schedule for achieving the required reductions specified in the TMDL.

[Visit DEQ's Columbia River TMDL web page](#) for more background.

Thank you,

David



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