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December 3, 2019

John Palmer
U.S. Environmental Protection Agency, Region 10
1200 6th Avenue, Suite 155 (19-C09)
Seattle, WA 98101

Sent via email to: palmer.john@epa.gov

RE: EPA's draft study on thermal refuges in the lower Columbia River

Dear John,

Columbia Riverkeeper (Riverkeeper) submits these comments on the U.S. Environmental Protection Agency's (EPA) draft study of thermal refuges in the lower mainstem Columbia River (hereinafter, the "draft study"). Riverkeeper appreciates the time and effort that informed this draft study and the many resources contained therein. Riverkeeper works to protect and restore the Columbia River and all life associated with it, from the headwaters to the Pacific Ocean. Riverkeeper represents over 16,000 members and supporters in Oregon and Washington and regularly comments on decisions impacting water quality and temperature pollution in the Columbia River. Many of Riverkeeper's members fish for, eat, or otherwise enjoy the salmon and steelhead that are jeopardized by EPA's failure to adequately control temperature pollution in the Columbia River.

Riverkeeper adopts and incorporates by reference comments submitted by Northwest Environmental Advocates, the Fish Passage Center, and the State of Washington on EPA's draft study. As detailed in those comments, Riverkeeper also questions EPA's contradictory conclusions that existing thermal refuges fully support the designated beneficial use of salmon migration—but that the river in general is too hot to support salmon migration and likely to get hotter due to climate change. The obvious reality is that existing thermal refuges do not fully support sockeye and spring/summer Chinook migration through the lower Columbia. And the species that *do* utilize thermal refuges, including steelhead and fall Chinook, are likely to see the purported benefits of this behavior diminish or disappear as the river warms over the next several decades. Accordingly, EPA's core determination—that thermal refuges fully support salmon migration—appears unsupported by EPA's draft study.

Riverkeeper also echoes Northwest Environmental Advocates' point that the draft document EPA produced is not a "plan" in any meaningful or normal sense of that word. Furthermore, a plan to meet a water quality standard is called a Total Maximum Daily Load

(TMDL). Unfortunately, EPA has ignored and, at times, actively resisted its duty to prepare a TMDL to address temperature pollution in the Columbia for the better part of two decades. Riverkeeper sincerely hopes that EPA will soon issue a TMDL to meet temperature standards in the Columbia and Snake rivers, which should include a robust and enforceable plan to protect and restore thermal refuges.

Riverkeeper writes separately to emphasize the urgent need for EPA to address the water temperature crisis in the Columbia River. Thermal refuges were supposed to supplement, not replace, attainment of Oregon's 68° F criterion. The grim reality is that most of the Columbia does not meet the 68° F criterion during most of every summer. Without meaningful leadership from EPA to address temperature problems, the dams and climate change will soon make the Columbia—with or without thermal refuges—too hot for salmon and steelhead to survive.

Please do not hesitate to contact me if Riverkeeper can be of further assistance.

Sincerely,



Miles Johnson
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