



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

APR 1 2008

Reply To: OWW-135

Mr. Bill Booth
Chair, Northwest Power and Conservation Council
P.O. Box 83720
Boise, ID 83720-0062

Dear Mr. Booth:

The U. S. Environmental Protection Agency (EPA) would like to take this opportunity to provide comments on the 2008 proposed amendments to the Northwest Power and Conservation Council's (Council) Columbia River Basin Fish and Wildlife Program. EPA has long believed that protecting and restoring water quality must be one of the essential elements of any long-term program for Columbia River Basin fish and wildlife recovery, building from the goals of the federal Clean Water Act (CWA). We appreciate past attention to the Clean Water Act in the Council's Fish and Wildlife Program. We would like to highlight two ecosystem factors, water temperature and toxics reduction, which are critical to Columbia River Basin fish and wildlife recovery and restoration. I ask that the Council give consideration to temperature and toxics in the Fish and Wildlife Program amendment process.

Toxics and Fish and Wildlife Recovery

In 2006, EPA designated the Columbia River as a priority Critical Ecosystem in EPA's 2006-2011 Strategic Plan with a focus on reducing toxics. A key element of the plan is measurable and accountable numeric environmental targets we will need to reach by 2011. These targets include restoring 16,000 acres of wetland in the Lower Columbia, 150 acres of contaminated site clean-up and a 10% reduction of toxic chemical concentrations in fish and water in five sites in the Columbia River Basin. EPA believes that these work efforts directly support Columbia River Basin fish and wildlife recovery.

We are launching a number of collaborative efforts around the Basin to achieve these numeric targets, in addition to our major ongoing Superfund-related clean-ups underway at Hanford, Portland Harbor and Lake Roosevelt. Examples of collaborations include pesticide stewardship partnerships with agriculture, legacy pesticide collection events, and financial support for precision agriculture technologies. We are currently developing a *State of the River Report* for the Columbia River Basin to characterize and assess toxic chemical problems, work initiatives, monitoring needs and toxic reduction needs in the Columbia River Basin.

Research from the NOAA Science Center and others has shown that toxic chemicals found in the Columbia River including PCBs, DDT, PAHs, pesticides, and flame retardants, can impair juvenile salmon growth and development, affect immune function, act as hormone disruptors and reduce reproductive success, even at low concentrations. Toxics can also alter salmon sensory abilities (particularly smell) and behavior, making it difficult for juveniles to swim, feed, avoid predators, and navigate their migratory path.

EPA believes that toxic contamination is a significant habitat issue in the Columbia River, and that salmon recovery will be enhanced by reducing toxic chemical concentrations in fish, water and sediment in the Columbia River Basin. There is much that is not understood about distribution, concentration, sources of toxic contamination and how juvenile salmon and other species are exposed to toxics. We believe that the 2008 amendments must acknowledge the critical role of toxics in fish and wildlife recovery and support increased monitoring and toxics reductions work. We look forward to working with NWPCC, NOAA and other agencies and interested parties as we develop answers to these questions.

Water Temperature

EPA Region 10 has a long-standing commitment to address water quality problems related to temperature. In 2003, working with our State and Tribal partners and, with NOAA and other agencies, we established our Regional temperature guidance. We are engaged in a variety of regulatory activities under the Clean Water Act to directly address temperature problems, such as setting TMDLs and point source permitting. Oregon and Washington have now adopted, and EPA has approved, water quality standards consistent with our temperature guidance. Oregon and Washington have developed hundreds of temperature TMDLs in the Columbia River Basin, including those for the Grande Ronde, Umatilla, Walla Walla, Wenatchee, Wind, and Willamette Rivers and the Hells Canyon reach on the Snake River. All of these activities are intended to improve river temperatures and reduce the adverse effects to salmon that currently occur in these rivers.

We appreciate your acknowledgement of water temperature as a critical ecosystem restoration factor and the attention it is given in the amendments. Within the latest version of the Water Quality Plan, there are several potential actions identified to lower water temperatures that we believe deserve further investigation and analysis. For example, the Plan identifies cool water releases and/or operational changes from the Hells Canyon Complex and Grand Coulee Dam as potential actions to lower water temperature during critical timeframes. We believe these actions should be further assessed. Additionally, options to reduce water temperatures immediately upstream of the dams and methods to protect and create areas of cold water refugia along the migratory corridor should be further explored. These activities are also identified in the Plan.

We understand challenges remain regarding how best to address issues related to water temperature in the Plan, including those listed above. I have raised this subject with NOAA Fisheries and support a regional dialogue on water temperature in the Columbia and Snake Rivers. It would be appropriate for the Council to participate in this ongoing dialogue, and I will ask our staff to share technical information with you on these issues.

We believe our activities are strongly supportive of our mutual responsibilities for salmon recovery and toxics reduction, and we welcome this opportunity to provide input on your Fish and Wildlife Program in this ongoing amendment process. We also look forward to working with you on a regional dialogue to address water temperature technical and policy questions. Please do not hesitate to contact me at (206) 553-1234, if you wish to discuss these issues further. Your staff may want to contact Mike Gearheard, Director of Water and Watersheds, at (206) 553-7151, to discuss any questions or concerns.

Sincerely,



Elin D. Miller
Regional Administrator

cc: Bruce Measure, Vice Chair, NWPCC
Melinda Eden, Council Member, NWPCC
Rhonda Whiting, Council Member, NWPCC
Dr. Tom Karrier, Council Member, NWPCC
Joan Dukes, Council Member, NWPCC
Jim Kempton, Council Member, NWPCC
Jim Yost, Council Member, NWPCC
Dick Wallace, Council Member, NWPCC