

# Snake River Rule Advisory Committee Meeting #1 Summary

## Feb. 4, 2026 – Virtual Meeting (Zoom)

The RAC met virtually to review the Snake River Temperature TMDL update, including project history, modeling approach, draft allocations, and Water Quality Management Plan strategies. Key discussions focused on interstate coordination, dam operations, surrogate measures, and implementation planning, with no major objections raised. Request video recording with [SnakeHells.TemperatureTMDL@DEQ.oregon.gov](mailto:SnakeHells.TemperatureTMDL@DEQ.oregon.gov).

## Attendees

### Rule advisory committee members

Maria Snodgrass	Oregon Department of Agriculture
Jorden Smith	Oregon Department of Fish and Wildlife
Rebecca McCoun	Oregon Department of Forestry
Marshall Pierce	City of Ontario
Doni Bruland	Baker County
Katy Nesbitt	Wallowa County
Jesse Naymik	Idaho Power Company
Ellie Hanson	Malheur Watershed Council
Don Elder	Pacific Rivers
Stephen Pfeiffer	Idaho Rivers United
Robbie O'Donnell	Washington State Department of Ecology
Lynn Larsen	Natural Resource Conservation Service
Mike Brown	United States Bureau of Land Management
Carmen Leguizamon	United States Fish and Wildlife Service
Chelsie Dugan	United States Forest Service
Scott Hauser	Upper Snake River Tribes

### DEQ staff

Ryan Michie	Water Quality Analyst
Tyler Dearman	TMDL Basin Coordinator
Mandy Ondrick	Interim Project Manager/ TMDL Basin Coordinator
Steve Mrazik	DEQ Head Quarters water quality manager

## Agenda

10 a.m.	Welcome, introductions, meeting agenda
10:10 a.m.	Rule Advisory Committee charter review
10:20 am.	Draft Total Maximum Daily Load

10:50 a.m. Draft Water Quality Management Plan  
12:20 a.m. Draft Administrative Rule language  
11:30 a.m. Draft Fiscal and Economic Impact Statement  
11:50 a.m. Wrap up, next steps  
12 p.m. Adjourn

## Meeting summary

**Mandy Ondrick, DEQ:** Mandy started the meeting with staff introductions, followed by the agenda covering meeting materials that DEQ posted on Jan. 23, 2026, in advance of the meeting. She then reviewed logistics and ground rules, and the rule advisory committee charter. Next, she performed a roll call of rule advisory committee members. Mandy continued with the project history, scope, and schedule.

**Ryan Michie, DEQ:** Ryan summarized the steps in the TMDL development process and required elements. Ryan defined assessment units and identified the 12 different assessment units applicable for the Snake River TMDL. The pollutant for this temperature TMDL was identified as heat or thermal loading and is proposed to be measured in kilocalories per day. EPA requires TMDLs be set at levels that will attain all applicable temperature water quality standards. Because the Snake River is an interstate water, Ryan reviewed the applicable numeric criteria for Oregon, Washington, and Idaho and why Oregon's criteria was determined to be the most protective. Ryan reviewed seasonal variation and critical periods for all 12 assessment units. Ryan described the major sources of temperature warming in the TMDL area which include discharges from NPDES permitted point sources, inflows from Snake River tributaries with elevated water temperatures, dam and reservoir operations, vegetation removal or disturbance, and background warming. Ryan paused to see if there were any questions.

**Robbie O'Donnell, Washington Department of Ecology:** The table with the standards listed for all three states shown on the slide appears to be different than the one that was included in the draft TMDL. The one on the slide appears to be updated with the most current Washington standard.

**Ryan Michie, DEQ:** We will take a look at the table in the TMDL but if there is something specific that looks incorrect, please send us some information on what needs to be corrected.

**Ryan Michie, DEQ:** Ryan proceeded to summarize the analysis approach. Ryan gave an overview of the model that was used for this TMDL. The model used is CE-QUAL-W2 version 4.5 and was developed by Idaho Power, Portland State University, the U.S. Environmental Protection Agency, Tetra Tech, and Oregon Department of Environmental Quality. Ryan reviewed the model scenarios that were used to understand source categories and inform allocations. He then proceeded to describe the various model scenario comparisons that were conducted and what question or topic each comparison was to evaluate. Ryan proceeded to share the results mode scenarios evaluating NPDES point source discharges, vegetation removal or disturbance, elevated tributary temperatures, and the Hells Canyon Complex of dams and reservoirs. Ryan continued to provide an overview on how the model was used to calculate the numeric TMDL allocations that will attain the criteria. He also showed a table that summarized all of the human use allowance assignments to each source category on each assessment unit. Ryan briefly reviewed the wasteload allocations, which is the portion of the loading capacity that goes to NPDES permitted point sources. Ryan wrapped up his presentation and asked if there were any questions.

**Scott Hauser (Upper Snake River Tribes):** The January 2026 Hells Canyon Federal Energy Resource Council's (FERC) Supplemental Environmental Impact Statement (SEIS) references the 2004 TMDL, what is Oregon's opinion on this given the 2004 TMDL is being updated? It would be concerning if FERC issues the 50-year license to the Hells Canyon Dam Complex based on determinations made from an TMDL that will no longer be valid (the temperature portion).

**Ryan Michie, DEQ:** Our 401-hydropower specialist is not on the call, we will reach out to that program and get back to you with that information.

**Scott Hauser (Upper Snake River Tribes):** With the 2004 TMDL, have you been able to see measurable improvements?

**Ryan Michie, DEQ:** Haven't looked at improvements in temperature in the area but for the other parameters that the TMDL addressed there have been statistical decreases and improving trends in different parts of the project area. Specifically in the Owyhee River mouth now attains the TSS allocation.

**Robbie O'Donnell, Washington Department of Ecology:** Question related to the surrogate measures, specifically in the model scenario report. It looks like the no dam scenario has warmer temperatures compared to the calibration scenario until August/September when those lines cross and the calibration is warmer than no dams. Is this where those surrogate measures come into play? What are the reductions that are targeted there and how does that work?

**Ryan Michie, DEQ:** The load allocation for the reservoir complex is no warming or zero human use allowance in reference to temperatures coming into the reservoir upstream. The TMDL requirement is to not increase temperatures from what is coming into the reservoirs when temperatures are warm enough to cause temperature criteria exceedances. The target reflects a no dam condition temperature profile. There's an inflection point (typically late August) when temperatures coming into the reservoirs go from being warmer than the outflow to being cooler than the outflow at Hells Canyon Dam. The temperature reductions primarily be in the late summer and during the fall spawning period. During the spring and early summer, once temperature reductions occur upstream, they will be passed through the reservoir system and attained in the downstream reach.

**Robbie O'Donnell, Washington Department of Ecology:** Are those reductions based on the 19 degree threshold in the surrogate measure? What are those reductions based off of?

**Ryan Michie, DEQ:** Reductions in the surrogate temperature target or reductions overall for the TMDL to meet standards?

**Robbie O'Donnell, Washington Department of Ecology:** When the inflection point hits in August and temperature reductions are needed, what is that target?

**Ryan Michie, DEQ:** The surrogate target works by targeting what comes into the reservoir in real time. There is a temperature monitoring location upstream of Brownlee that will record daily temperatures. The equation in the TMDL is used to estimate what the temperature would be at Hells Canyon Dam without the effect of the dam and reservoirs. This is the target release temperature. When the equation calculates temperatures are above 19 degrees C in the summer, there can be no warming as increases above 19 can cause exceedances to the temperature criteria downstream. There's a slightly different temperature threshold in spawning period. The surrogate target represents a temperature condition that will not lead to cumulative warming downstream from the project that would push temperatures above 20.

**Tyler Dearman, DEQ:** Tyler summarized components of the Water Quality Management Plan (WQMP). The WQMP names responsible persons, including Designated Management Agencies (DMAs), as responsible for TMDL implementation. He reviewed rationale for naming responsible persons and which persons must prepare implementation plans. He quickly covered the interstate coordination that is ongoing between Idaho DEQ, Oregon DEQ, and EPA. Tyler paused for questions before moving forward to discuss priority management strategies.

**Maria Snodgrass, ODA:** Not a question but this may be a good time to note that ODA has concerns with what is included in the WQMP, related to consistency with the memorandum of agreement between DEQ and ODA. Want to make sure that DEQ is aware.

**Mandy Ondrick, DEQ:** Thanked Maria for her comment and let her know that submitting that type of feedback may be more suitable in a written comment that can be submitted after the meeting and more instructions on how to do this will be given at the end of the meeting.

**Tyler Dearman, DEQ:** Tyler continued on with his presentation and proceeded to review the priority management strategies to address TMDL pollutants and load allocations including those for riparian vegetation, water withdrawals and flow alteration, channel modification, and dam and reservoir management. Tyler paused to ask the RAC if there were any additional strategies that should be added to the WQMP beyond what he reviewed. There were no responses. Tyler continued to review the monitoring requirements in the WQMP. Tyler concluded his presentation with an overview of the schedule for implementation. DMA's will begin convening with DEQ shortly after the temperature TMDL is finalized but implementation plans will not be due until 18 months after the upcoming mercury TMDL has been finalized. Tyler asked the RAC if there were any questions related to the WQMP.

**Robbie O'Donnell, Washington Department of Ecology:** What is the interaction, if any between this WQMP and Oregon's 401 certification for the Hells Canyon Dam Complex?

**Tyler Dearman, DEQ:** The main interaction with the WQMP is that the 401 certification is going to be used to meet the implementation plan requirements for Idaho Power. The requirements in the 401 will be sufficient to cover the implementation plan requirement.

**Robbie O'Donnell, Washington Department of Ecology:** If there are increases in flow releases what are the results of that downstream (in Washington) in terms of effects on cold water release or any type of dilution effect of that? Don't need answers now, just more so questions for the future.

**Ryan Michie, DEQ:** Don't have an answer for how different management will affect downstream reaches in Washington, but we built a model that extends to the lower portion of the Snake River down to the point where the model that was used in the Lower Snake and Columbia River Temperature TMDL starts. We are happy to provide the model if Washington is interested in exploring this.

**Jessee Naymik, IPC:** Just wanted to jump with a couple comments since there was a lot of discussion around downstream effects, 401 implications, etc. IPC is still working to digest the implications on this new TMDL. Relative to the questions Robbie posed, this is why the dam complex is regulated through the 401 certifications which is part of the FERC relicensing project and is much larger. Many aspects to consider when discussing meeting temperature changes downstream and in the future.

**Mandy Ondrick, DEQ:** Reviewed draft rule language and provided background on the fiscal, economic, and racial equity impacts review. She asked the RAC members for feedback on the following questions:

- Will the draft rule have a significant adverse impact on small businesses?
- If a significant impact is identified, how could DEQ reduce the fiscal impact on small business?
- Will the proposed rule impact racial equity?
- What are additional considerations for environmental justice for this draft rule?
- What types of entities will be impacted by the proposed rule?
- How and to what extent will the proposed rule have a positive, negative, or no impact on these entities?

There were no responses from the RAC committee.

**Rebecca McCoun, ODF:** Question regarding the portion of the WQMP where it talks about some of the entities may be able to implement the WQMP through incentives like the Oregon plan for salmon and watershed. Will this be similar to OWEB or farm service agency in that this rule may impact landowners' eligibility for those programs because it's in a sense required? With forestry, small landowners can't receive OWEB grants to plant trees if they're required to plant trees by law. Just wondering if that carried over for other funding opportunities.

**Tyler Dearman, DEQ:** I don't believe this should change the eligibility of those offerings.

**Mandy Ondrick, DEQ:** Mandy reviewed next steps for the public process and provided the links for more information. Mandy requested any additional feedback from the RAC members. There were no responses, Mandy proceeded to open up the meeting to non-committee members for questions and feedback.

Gina Hoff, Bureau of Reclamation: Is the BOR named in this DMA and are we required to develop an implementation plan?

**Tyler Dearman, DEQ:** The BOR is named as a DMA because they have streamside ownership, however an implementation plan will not be required at this time.

Mandy closed the meeting at approximately 11:45 a.m.

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