

June 30, 2020

Submitted Via Email to michelle.dale@deq.idaho.gov

Michelle Dale
Idaho Department of Environmental Quality
1410 N. Hilton Rd.
Boise, ID 83706

Re: Lower Snake – Asotin Subbasin (HUC 17060103)
Salmonid Spawning Use Designation

Dear Ms. Dale:

Thank you for the opportunity to comment on the Idaho Department of Environmental Quality's (DEQ) Clean Water Act Section 303 water quality standards triennial review. As noted in the issue paper published by DEQ, and referenced in the public meeting, DEQ is reviewing the available data and considering a salmonid spawning (SS) beneficial use designation in the Lower Snake – Asotin subbasin, HUC 17060103, pursuant to a condition in the National Marine Fisheries Service's Biological Opinion on the Hells Canyon site specific temperature criteria.

Idaho Power Company (IPC) is an investor-owned utility that serves approximately 570,000 customers in a service area covering southern Idaho and eastern Oregon that spans 24,000 square miles. IPC also owns and operates the Hells Canyon Complex (HCC). IPC supports DEQ's initiation of a rulemaking to designate a SS beneficial use designation in the Lower Snake – Asotin subbasin.

Idaho designates water bodies for cold water aquatic life and SS beneficial uses. IDAPA 58.01.02.110-160. Waters that provide, or could provide, habitat for self-propagating populations of salmonid species are to be protected for SS. IDAPA 58.01.02.100.01.b. The SS designation provides specific dissolved oxygen and temperature criteria. IDAPA 58.01.02.250.f. A rulemaking would also designate the season or seasons based on spawning and incubation in a given year.

As you know, the Asotin subbasin is located on the Snake River from below the Salmon River to the confluence with the Clearwater River. The reach of the Snake River below the HCC and the confluence of the Snake and Salmon rivers is already designated by DEQ as SS. Fall chinook spawning in the Snake River downstream of its confluence with the Salmon River is similar in nature and timing as within the Snake River reach that is already designated as SS. In its issue paper, DEQ seeks data and sources of information to support the location and timing of SS, incubation, and rearing for a SS beneficial use designation. IPC has fall Chinook salmon redd

distribution observations since 1991 in the proposed area which may be useful in DEQ's consideration.

Existing data clearly show that SS designation for the Snake River in the Lower Snake – Asotin subbasin, would be appropriate. If DEQ decides to initiate a rulemaking, IPC would make its information available for DEQ's review and consideration. Thank you again for the opportunity to provide these comments. If you have any questions about the content of this letter, please contact me at rmyers@idahopower.com or via telephone at (208)388-2358.

Sincerely,

A handwritten signature in blue ink that reads "Ralph Myers".

Ralph Myers

ENVIRONMENTAL MANAGER

Idaho Power Company

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