



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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October 27, 2000

Mr. Gregg Carrington
Re-Licensing Project Manager
Chelan County PUD
PO Box 1231
Wenatchee, WA 98807-1231

Dear Mr. Carrington:

I am pleased that you found our telephone discussion on August 16 helpful. The Department of Ecology is committed to working collaboratively with the Chelan PUD to seek the answers to difficult questions that arise in the process of obtaining a 401-certification and meeting state water quality standards.

We need to work collaboratively with you to answer your questions because the issues that arise over temperature and dissolved gas in the Columbia do not have precedent and therefore Ecology does not always have ready answers.

I hope you understand that the 401-water quality standards certification on your application for a FERC license is to be issued out of our regional office in Yakima. Tom Tebb has recently been hired to be the Water Quality Section Manager in the Yakima office, and is likely to be the person responsible for issuing the final 401 certification. Pat Irle of his staff is your prime contact for water quality issues on the affected waters. Chris Maynard, of my staff, is assisting her in the 401 certification as your prime contact for Columbia River Basin TDG issues and coordination of statewide policy issues that arise during the FERC process. With their assistance, I have attempted to answer the questions posed in your letter of September 7, 2000:

1. *How would DOE evaluate temperature-monitoring information to determine if the Rocky Reach reservoir affects water temperature?* The U.S. Environmental Protection Agency (EPA) is gearing up to complete a Total Maximum Daily Load (TMDL) on the entire Columbia and Snake Rivers by December 31, 2002. Under this process, EPA, Ecology and the PUD, as well as other entities, will need to work closely to monitor and determine dam-caused temperature exceedances (as opposed to natural exceedances) and to identify appropriate measures to address any exceedances. It is probable that this TMDL will serve as the basis for the 401 certification for state temperature standards.



Mr. Gregg Carrington
October 27, 2000
Page 2

While we do not have specific answers to your questions, we will work towards those as part of the TMDL process.


2. *What is Ecology's long-term goal with TDG?* The long-term goal is to protect the beneficial uses of the river. The best information that we have indicates that 110 percent saturation is a fair standard to move toward and is protective enough of aquatic organisms. Under federal law, all users must comply with this standard, unless it is revised by the state and approved by EPA.

What would happen if this goal proved unattainable? Several potential scenarios could be considered. One, a 401 might be issued with compliance schedule designed to continuously improve operations and structures to move toward compliance. Two, the PUD and/or others could undertake to provide compelling evidence that the standard would be protective of beneficial uses even if it was raised. Generally, a use attainability analysis would need to be undertaken to attempt to show that uses would be met and protected with a less stringent standard on your specific waters.

We understand the PUD's desire to have these questions answered. Because the water quality issues associated with hydropower that have arisen are new to both the PUD and Ecology, please bear with us and assist us by working with Ecology staff to answer these difficult questions.

I encourage you to continue to work closely with our staff and with EPA. We look forward to working with you and other Chelan PUD staff toward issuance of a 401-certification for the project.

Sincerely,



David Peeler, Manager
Watershed Management Section

cc: Pat Irle
Tom Tebb
Chris Maynard