

**WA Dept. of Ecology's Public Hearing on  
Multiple Revisions to WAC 173-201A  
Water Quality Standards for Surface Waters of the State of Washington**

**Oral Testimony from Michael Deen, Public Power Council.  
Received 9-16-2019 in Vancouver, WA**

\*\*\*

Transcription was provided by PostCAP LLC in Olympia, WA.

Okay. It looks like we have Michael Deen.

Welcome. Great. And then just speak clear -- announce your name clearly.

>> All right. Good afternoon, my name is Michael Deen. I'm the Policy Director at the Public Power Council. PPC is a trade association representing the nonprofit electric utilities. The purchase the output of the Federal hydro system from the Bonneville Power Administration. We have more detailed written comments forthcoming but felt it was appropriate to use this opportunity, as well, given the importance of the issues under consideration.

As it's been discussed previously a key basis of this proposed rule change is the 2019 to 2021 flexible spill agreement. With the goal of finding creative solutions to support benefits for endangered species as well as carbon-free generation from the Federal hydro system and as a bridge during the completion of the Columbia River system operation process.

So I would like to briefly touch on three key areas here. One is the temporal scope of the rule change. We believe that should be linked to the underlying flexible spill agreement as a mechanism to not get ahead of the ongoing CRSO process, which we believe is the appropriate venue for consideration of long-term mitigation strategy, including spill levels.

No. 2, we support strongly robust monitoring of the effects of the spill operations, both on juveniles, returning adults salmon and steelheads as well other aquatic species. We believe this is important to prevent unintended consequences in the short term of these higher spill levels and to provide valuable information in the long term to support dynamic and effective management of the river for its multiple purposes.

Third, we strongly support continued inclusion of language that links this rule change to legally valid Endangered Species Act consultation where applicable. So I would like to thank you again for your consideration, both these brief comments here today and of our forthcoming written comments ahead of the September 26th deadline. Thank you.