



# United States Department of the Interior

BUREAU OF RECLAMATION  
1150 North Curtis Road  
Boise, ID 83706-1234



IN REPLY REFER TO:

PN-1000  
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Submitted electronically via <http://wq.ecology.commentinput.com/>

Angela Zeigenfuse  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

Subject: Request for Comments on EPA's Request for 401 Certification of the NPDES Permits for U.S. Army Corps of Engineers' Facilities on the Lower Columbia and Snake Rivers

Dear Ms. Zeigenfuse:

I write today on behalf of the Bureau of Reclamation to comment on the above referenced matter. Reclamation and the U.S. Army Corps of Engineers operate numerous multi-purpose federal water management projects in the Columbia River basin. Reclamation and the Corps operate fourteen of those projects together as the integrated Columbia River System to serve an array of statutory purposes, including flood risk management, hydroelectric power generation, navigation, and water supply, among others. Reclamation operates and maintains two System projects, including Grand Coulee.

Although Ecology's request for comments relates to eight of the Corps' System projects, conditions imposed on those individual projects can affect carefully balanced System operations, including Reclamation's operation of Grand Coulee. Indeed, changing operations of System projects for the benefit of one resource almost always impacts other resources. The Columbia River System Operations Draft Environmental Impact Statement illustrates many of the ways these types of operational tradeoffs can occur.

Because of the System's size, complexity, and diverse obligations, imposition of 401 certification conditions risks unintended consequences. To mitigate such risks, and in recognition of the Corps' specialized knowledge of its projects, Reclamation encourages Ecology to engage the Corps in its decision-making. That coordination should include, at a minimum, an opportunity for the System operating agencies, including the Corps as the entity responsible for implementation of these NPDES permits, to comment on any 401 certification conditions Ecology proposes. Reclamation understands that Ecology has provided similar opportunities to other operators of hydroelectric facilities, and encourages Ecology to extend the same to the Corps and Reclamation.

Thank you for the early opportunity to comment on this matter. Reclamation looks forward to further dialog with Ecology.

Sincerely,

LORRI GRAY

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GRAY  
Date: 2020.04.13 12:59:29  
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Lorri J. Gray  
Regional Director

INTERIOR REGION 9 • COLUMBIA-PACIFIC NORTHWEST

IDAHO, MONTANA\*, OREGON\*, WASHINGTON

\* PARTIAL