

PUD No., 1 of Chelan County

Please find attached, Chelan PUD's comment letter regarding the Draft Upland Finfish General Permit. We have appreciated the opportunity to review and comment on this document during this public comment period.



PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY

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May 26, 2021

Ms. Laurie Niewolny
 Washington State Department of Ecology
 P.O. Box 47775
 Olympia, WA 98504-7775

Re: Comments on the Draft Upland Finfish Hatching and Rearing General Permit and Fact Sheet

Dear Ms. Niewolny:

The Public Utility District No. 1 of Chelan County (Chelan PUD) respectfully submits this comment letter on the draft Upland Finfish Hatching and Rearing General Permit (General Permit) and Fact Sheet. Our comments are focused on the General Permit conditions that affect facilities owned or operated by Chelan PUD.

1. Discharge Limits for Eastbank and Chelan Hatcheries.

Condition S3.G.2, Table 3 of the Draft General Permit (Page 16) indicates that Eastbank and Chelan Hatcheries have a final heat load allocation under the Total Maximum Daily Load (TMDL) for temperature in the Columbia and Lower Snake Rivers¹. Appendix F of the General Permit provides the heat load allocation applicable for these hatcheries as applicable in the TMDL (also provided in Table 1 below). During the public comment period, Chelan PUD provided proposed revisions to the heat load allocations to accurately reflect the flow and temperature information that were used for these point sources in the Columbia and Snake Rivers Temperature TMDL (Table 1). U.S. Environmental Protection Agency has not yet released a final TMDL that has reconciled these revisions. We request that the final General Permit use the requested revisions to the flow, temperature, and the heat load allocations as shown in Table 1 to accurately reflect the conditions at the hatcheries.

Table 1. Heat Load Allocations in the TMDL, General Permit, and Changes Requested by Chelan PUD

Site	Columbia and Snake Rivers Temperature TMDL Table 6-13 and Appendix F (Page 57) of draft General Permit			Corrections Requested by Chelan PUD on the Columbia and Snake Rivers Temperature TMDL		
	Waste Load Allocation (kcal/day)	Flow (MGD)	Temperature (°C)	Waste Load Allocation (kcal/day)	Flow (MGD)	Temperature (°C)
Chelan Hatchery (WAG135006)	4.25E+08	6.7	16.8	1.14E+09	17.3	17.5
Eastbank Hatchery (WAG135001)	1.78E+09	27.1	16.8	1.95E+09	29.5	17.5

¹ U.S. Environmental Protection Agency, 2020. [Columbia and Lower Snake Rivers Temperature Total Maximum Daily Load](#), U.S. Environmental Protection Agency Region 10, Seattle, WA. May.

2. Monitoring and Reporting Requirements for Chelan and Eastbank Hatcheries.

Condition S3.G.2, of the Draft General Permit, identifies that facilities with a TMDL or pollution prevention plan will be required to conduct monitoring as under Appendix F. Section B, states, "*The implementation of the heat load WLAs will be assessed as an average monthly limit during the critical period of July through September...*". The waste load allocations for temperature in the Columbia and Snake Rivers Temperature TMDL applies from July – October, and is as such different from the period indicated in Appendix F. The table in Section C. on Page 58 of Appendix F, identifies that the Chelan and Eastbank Hatcheries are required to monitor temperature continuously from July 1 – September 31, which we have interpreted to mean September 30. Please clarify whether the period indicated in Appendix F is correct for monitoring temperature and flow at the hatcheries.

3. Inconsistencies in Quantitation Levels for Parameters in Appendix A and Appendix E.

The quantitation levels for pH and dissolved organic carbon provided in Appendix A and Appendix E are inconsistent. Please clarify which one should be followed.

If there are any questions on these comments and requests, please contact Ian Adams at (509) 661-4409 or by email at Ian.Adams@chelanpud.org.

Sincerely,



Alene Underwood
Fish and Wildlife Manager
Public Utility District No. 1 of Chelan County

cc: Damon Roberts, Mark Peterschmidt, and Marcia Porter, Washington State Department of Ecology,
Central Region – *Sent via Email*