



Grant County
PUBLIC UTILITY DISTRICT
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December 13, 2007

James Bellatty
Department of Ecology
Eastern Regional Office
4601 N. Monroe
Spokane, Washington 99205-1295

Re: Request for extension of TDG Abatement Plan for 2008 fish-spill season

Dear Mr. Bellatty:

This letter provides background information related to Public Utility District No. 2 of Grant County's (Grant PUD's) Priest Rapids Project total dissolved gas (TDG) abatement plan, which expires on February 29, 2008; and requests a one-year extension of the currently approved TDG abatement plan.

Grant PUD owns and operates the Priest Rapids Hydroelectric Project (Project), which includes the Wanapum and Priest Rapids dams on the Columbia River downstream of Vantage, WA. A TDG abatement plan is required to adjust the required TDG water quality standard to allow spilling water at a dam to aid passage of migrating salmonids (Washington Administrative Code 173-201A-060(4)(b)). On April 7, 2005, the Washington State Department of Ecology (Ecology) approved the Priest Rapids Project TDG abatement plan for a three-year period expiring on February 29, 2008.

The TDG abatement plan was to address the period until a new FERC license for the Project, incorporating condition that would be included in the 401 Water Quality Certification (WQC), issued. On April 3, 2007, Ecology issued the 401 WQC for the Project; however, the new license incorporating those conditions is still pending and the effective date of the 401 is expressly based on the issuance of that license. While we expect that FERC may soon issue the license, it seems most prudent to address the contingency of further delay in that action by extension of the current TDG abatement plan for the 2008 fish-spill season. By this letter, Grant PUD formally requests that the approval of that plan be extended through 2008. As identified under the current TDG abatement plan, Grant PUD plans to continue the following TDG abatement activities in 2008:

1. Continue to monitor hourly TDG values in the forebay and tailrace of Wanapum and Priest Rapids dams at Grant PUD's fixed site monitoring (FSM) locations.

Public Utility District No. 2 of Grant County, Washington

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Data will be used to verify compliance with TDG standards and adjust spill levels as necessary in conjunction with the Priest Rapids Coordinating Committee's appointed Spill Committee, a four-member committee that includes representatives from Ecology, Washington State Department of Fish and Wildlife, Yakama Nation Tribe, and Grant PUD. As a member of the Spill Committee, Ecology will be notified prior to initiation and end of the fish-spill seasons (e.g. spring and summer).

2. Continue to conduct biological monitoring of fish collected from the Priest Rapids Dam forebay for signs of Gas Bubble Trauma (GBT).
3. Continue to post hourly and daily summary TDG data, and results of GBT monitoring, to Grant PUD's water quality web-site (<http://www.gcpud.org/stewardship/waterquality.htm>).
4. Continue to provide Ecology with annual TDG monitoring reports that include:
 - Summary of flow data and comparison with previous 10-year average flows.
 - Summary of fish-spill operations, including fish-spill and migration timing results and any changes to fish-spill operations made to help reduce TDG levels.
 - Summary of TDG data collection results, including discussion of FSM locations, quality assurance and quality control (QA/QC) protocols, and QA/QC results.
 - Summary of TDG data, the number of TDG variances above water quality standards, and changes to fish-spill operations in order to reduce TDG levels.
 - Summary of any biological data collected during GBT monitoring.
 - Summary of on-going and future TDG abatement activities, such as new construction projects, changes to monitoring protocols, improvements to the FSM system, etc.
5. Continue to schedule regular maintenance of turbine units so that during the spill period, all units can be available to pass excess water through the turbines, subject to power load requirements, and thus avoid involuntary spill.
6. Continue attempts to maximize powerhouse flows, subject to power load requirements, during high flow periods in order to minimize involuntary spill.
7. Continue with installation of advanced turbine units at Wanapum Dam that will add increased powerhouse capacity, subject to power load requirements and generator capacities, which will help to minimize involuntary spill during high flow conditions. Three of ten Wanapum Dam advanced turbines have been installed, with the fourth currently scheduled for completion in 2008. All ten advanced turbines are scheduled to be installed by 2012.

8. Continue with design and planning associated with new turbines at Priest Rapids Dam.
9. Continue with the construction of the Wanapum Dam Future Unit Fish Bypass WFUFB, currently scheduled for operation during the 2008 fish-spill season. The WFUFB is designed to safely pass migrating salmonids with up to 20 kcfs of water while producing minimal TDG levels (as compared to tainter-gate spill).
10. Continue with the design and modeling of a new fish-bypass at Priest Rapids Dam, which will have an emphasis on fish survival and minimal TDG production.

Grant PUD appreciates your consideration and response to this request. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Dresser". The signature is fluid and cursive, with the first name "Tom" and last name "Dresser" clearly distinguishable.

Tom Dresser
Manager, Fish, Wildlife, and Water Quality

Cc: Marcie Mangold
Chris Maynard
Jennifer Hill, FERC
Phillis J. Posey, FERC
Kim Nguyen, FERC
Laurel Heacock
Stephen Brown