



# Oregon

John A. Kitzhaber, MD, Governor

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September 18, 2014

Low Impact Hydropower Institute  
P.O. Box 194  
Harrington Park, NJ 07640

Re: Letter of Support for Low Impact Hydro Institute Re-certification for the Pelton-Round Butte Project (FERC Project No. 2030)

Dear members of the Low Impact Hydropower Institute review committee:

The Oregon Department of Environmental Quality (DEQ) expresses our support for Low Impact Hydropower re-certification of the Pelton-Round Butte (PRB) Project. As described below, the Project is compliant with state water quality requirements as outlined in Section B of the Recertification Questionnaire.

**1. Is the Facility either: a) In Compliance with all conditions issued pursuant to a Clean Water Act Section 401 water quality certification issued for the Facility after December 31, 1986? Or b) In Compliance with the quantitative water quality standards established by the state that support designated uses pursuant to the federal Clean Water Act in the Facility area and in the downstream reach?**

**YES:** Clean Water Act Section 401 water quality certification for the Project was issued by the Oregon Department of Environmental Quality (ODEQ) and the Confederated Tribes of the Warm Springs Reservation Water (CTWSR) Control Board in June 2002. The Project is in compliance with the conditions included in these certifications.

**2. Is the Facility area or the downstream reach currently identified by the state as not meeting water quality standards (including narrative and numeric criteria and designated uses) pursuant to Section 303(d) of the Clean Water Act?**

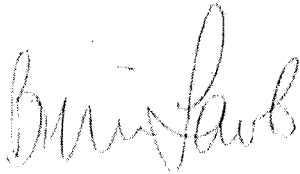
**YES:** The Deschutes River below the Project is included on the State's 303(d) list for not meeting water quality standards for the following parameters: flow modification, dissolved oxygen, pH, and temperature. Lake Billy Chinook and Lake Simtustus are listed for not meeting water quality standards for pH and chlorophyll-a.

**3. If the answer to question B.2 is yes, has there been a determination that the Facility does not cause, or contribute to, the violation?**

YES: This determination was made as part of the original 401 certification for the project and referenced in DEQ's comments for the LIHI certification from 2006. Since 2006, a selective withdrawal structure has gone on-line as part of the Project. As was required in the 401 certification and the associated Water Quality Monitoring and Management Plan, operation of the facility is being done under an adaptive management approach. PGE has been monitoring water quality conditions within the Project and in the Deschutes River downstream of the project and is continuing to learn how to adjust operations to better meet water quality standards. PGE, DEQ and the CTWSR are in regular communication to ensure compliance with the terms of the 401 certifications.

Please feel free to contact me if you have any additional questions:  
[lamb.bonnie@deq.state.or.us](mailto:lamb.bonnie@deq.state.or.us) or 541-633-2027.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bonnie Lamb".

Bonnie Lamb  
Deschutes Basin Coordinator

cc: Ted Wise, ODFW