

**From:** Rhett Lawrence [rhett@wildsalmon.org]  
**Sent:** Friday, September 22, 2006 11:27 AM  
**To:** Niemi, Cheryl (ECY)  
**Subject:** Save Our Wild Salmon comment clarification

Dear Ms. Niemi:

Save Our Wild Salmon would like to submit a clarification to our comments, sent electronically September 15th, on "Economic Guidance for Meeting Water Quality Standards for Dams" published by the Washington Department of Ecology (Ecology). It has come to our attention that our comments may be misunderstood. We respectfully request that you include this clarification on the record and consider it as you would a timely submission.

Our comments advise that the Ecology's proposal lacks detail on whether harm to the environment is worth the cost of improvements to meet water quality standards (p.2). Our intention was to note the lack of detail in the guidance, and to discourage Ecology from creating a process that gives dam owners a financial "out" from meeting their obligations to protect water quality. We do not support any sort of cost-benefit approach to complying with water quality standards. Furthermore, we do not interpret the Clean Water Act to allow Ecology to make any economic feasibility determination that would allow a dam owner to fall short of meeting water quality standards.

Should Ecology fail to heed our recommendation to drop the economic feasibility analysis, our comments request that Ecology consider alternative energy sources such as efficiency and conservation when it analyzes the cost of replacement power (p.2). To be clear, we do not support including the cost of replacement power in the analysis. However, if Ecology decides - over our objection - to include the cost of replacement power in its assessment, it should consider alternative energy sources.

Thank you for the opportunity to clarify our comments.

Sincerely,

Rhett Lawrence

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Rhett Lawrence

Policy Analyst

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