

From: Hampton, Waikele M. [<mailto:waikele.hampton@chelanpud.org>]
Sent: Thursday, December 02, 2010 1:25 PM
To: Bresler, Helen (ECY)
Subject: Comments on Draft Trading Framework Paper

Ms. Helen Bresler
Department of Ecology, Water Quality Program
PO Box 47600
Olympia, WA 98504-7600

Subject: Comments on DRAFT TRADING FRAMEWORK PAPER

Dear Ms. Bresler:

This letter constitutes the comments of Public Utility District No. 1 of Chelan County (Chelan PUD) on the September 20, 2010 *Draft Trading Framework Paper for Review and Comment*. The purpose of this letter is to provide Chelan PUD's written comments on the Draft.

General Comment:

Chelan PUD suggests that trading should not be limited to pollutant wasteload reductions, but rather should include all activities that would provide the same improvement to water quality as a pollutant wasteload reduction.

Specific Comments:

Page 3, Introduction, How trading works – ADD the following to the end of this section, “4. Conditioning their discharge to achieve an equal or lesser impact to water quality compared to their assigned wasteload reduction.”

Page 3, Introduction, What is a credit? – REVISE the first bullet point to read, “A unit of pollutant reduction usually measured in pollutant quantity (pounds) per unit of time at a point of compliance, or a change in the characterization or location of the discharge to achieve an equal or greater improvement to water quality as a unit of pollutant reduction.”

Page 3, Introduction, What is a credit? – REVISE the second bullet point to read, “Generated by a point source by over-controlling its discharge – going beyond reductions required by its WLA-based permit limit or its existing permit limit, whichever is more stringent, or changing the characterization or location of the discharge to achieve an equal or greater improvement to water quality that would be achieved by a pollutant reduction.”

Page 4, Defining the trading universe, Determining eligible traded – REVISE the sixth bullet point to read, “Trading a pollutant for a water quality enhancement, such as increasing dissolved oxygen, adjusting pH, or adding alkalinity as a trade for reducing phosphorus.”

Page 4, Defining the trading universe, Determining eligible trades – ADD the following to the end of this section, “Relocate the discharge to a location in the watershed with greater assimilative capacity for the pollutant.”

Page 6, Study requirements, REVISE the third bullet to read, “Determination of the net reduction in pollutant loading, or water quality improvement, to be achieved by the proposed action, considering all relevant environmental influences (natural or otherwise), including seasonal variation in loading, lag times between installation and achievement of pollutant reduction, uncertainty, and other factors.”

We appreciate the opportunity to comment on this document and apologize for getting our comments to you after the deadline. Chelan PUD looks forward to continuing to actively participate in the future development of this Trading Framework.

Sincerely,

Ron Slabaugh
Water Resource Manager
509-661-4131

and

Waikele Hampton
Environmental Permit Coordinator
509-661-4627

Chelan County Public Utility District