



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NORTHWESTERN DIVISION
PO BOX 2870
PORTLAND, OR 97208-2870

Mr. Vincent McGowan, P.E.
Water Quality Program Manager
State of Washington
Department of Ecology
PO Box 47600, Olympia, WA 98504-7600

Re: Disapproval of Water Quality Attainment Plan

Dear Mr. McGowan,

This letter is the submittal that was requested in your letter dated June 27, 2024 documenting the State of Washington's Department of Ecology's (Ecology) disapproval of the Water Quality Attainment Plan (WQAP) for the lower Snake River dams: Lower Granite, Little Goose, Lower Monumental and Ice Harbor. The U.S. Army Corps of Engineers (Corps) submitted the WQAP on March 29, 2024.

To satisfy Ecology's requested submittal, the Corps is providing a detailed schedule for revising the WQAP in cooperation with a workgroup (see Attachment 1). Ecology's guidance recommends forming an advisory workgroup.¹ The Corps has developed an approach that meets the intent of the guidance and also meets requirements of the Federal Advisory Committee Act (41 C.F.R. § 102-3.40(d)—(e)). The Corps will coordinate and facilitate working group sessions to solicit input and recommendations from interested governmental entities and tribes regarding the WQAP development. The Corps will consider each participant's input and recommendations and provide a revised WQAP to Ecology for approval.

The Corps plans to invite the following sovereigns and federal and state agencies to send representatives: Ecology, Washington Department of Fish & Wildlife, interested Tribes, Environmental Protection Agency, Bonneville Power Administration, Bureau of Reclamation, the State of Idaho, National Marine Fisheries Service, and U.S. Fish & Wildlife Service. The Corps will facilitate the workgroup, provide subject matter experts, document the proceedings of the workgroup, and receive written comments from participants. The work group meetings will be administrative in nature for sharing information and intended solely to assist the Corps in developing a WQAP required by Section II.F of the National Pollutant Discharge Elimination System (NPDES) permits, dated effective April 1, 2022, for the Corps' lower Snake River dams.

¹ Ecology, 2023, Ecology Guidance for Preparing a Dam Compliance Schedule Request and Water Quality Attainment Plan.

The Corps is committed to implement temperature control strategies and meet the load allocations in the Columbia and Lower Snake Rivers Temperature TMDL. While the Corps has analyzed and implemented multiple water temperature improvement actions over the years, the work is not done. The Corps will use this process to evaluate all reasonable and feasible alternatives to achieving state water quality standards in the TMDL, consistent with the NPDES permit and 33 U.S.C. § 1371(a).

After written feedback from Ecology regarding the proposed schedule, the Corps will finalize a scope, structure, and schedule of the WQAP working group meetings. The proposed schedule will be updated to allow the process to evolve through collaboration with Ecology and the working group participants.

Sincerely,

Frances E. Coffey, SES
Director, Programs

Enclosure

cc:

Kathryn Tackley, USACE, Kathryn.L.Tackley@usace.army.mil

Dan Turner, USACE, Daniel.F.Turner@usace.army.mil

Matt Drumheller, USACE, Matthew.W.Drumheller@usace.army.mil

Martin Merz, USEPA, Merz.Martin@epa.gov

Jennifer Wu, USEPA, Wu.Jennifer@epa.gov

John Palmer, USEPA, Palmer.John@epa.gov

Thomas Starkey-Owens, Ecology, thst461@ecy.wa.gov

Chad Brown, Ecology, Chad.Brown@ecy.wa.gov

Enclosure 1

Draft schedule for revised WQAP in coordination with a workgroup

Task	Date
Receive Ecology feedback. Finalize revision approach and schedule.	Oct 2024
Workgroup Meeting 1. <ul style="list-style-type: none"> • Describe WQAP requirement. • Describe purpose and scope of the working group • Lower Snake River temperature overview, “state of science” • Present draft evaluation criteria and draft list of potential actions/projects • Discuss, receive input 	Nov 2024
Workgroup Meeting 2. <ul style="list-style-type: none"> • Present updated evaluation criteria and list of potential actions/projects • Explain modeling/analysis strategy • Discuss, receive input 	Dec 2024
Workgroup Meeting 3. <ul style="list-style-type: none"> • Present final evaluation criteria and list of actions/projects to evaluate • Show example results so participants understand how outputs of analysis will be shared • Discuss, receive input 	Jan 2025
Corps modeling work occurs	Feb – Apr 2025
Workgroup Meeting 4. <ul style="list-style-type: none"> • Review evaluation criteria used, actions/projects evaluated, analytical methods • Share results • Present draft recommendations (ranking of alternatives) • Discuss, receive input 	May 2025
Develop draft WQAP documentation	Jun – Aug 2025
Workgroup Meeting 5. <ul style="list-style-type: none"> • Send out draft WQAP 2 weeks before meeting • Give ppt presentation on draft WQAP • Discuss, receive input Accept written input on draft WQAP for 2 weeks after meeting	Sep 2025
Final WQAP based on feedback from workgroup	Oct – Dec 2025
Submit revised WQAP for approval by Ecology	Jan 2026