



March 23, 2023

Ms. Amy Moon
EFSEC Site Specialist
Washington State Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
PO Box 43172
Olympia, WA 98503-3172

Subject: Comments for NPDES Permit No. WA-0025151 / Columbia Generating Station Outfall

Ms. Moon:

Thank you for the opportunity to provide comments regarding the proposed National Pollutant Discharge Elimination System (NPDES) permit for the Energy Northwest Columbia Generation Station located U.S. Department of Energy's Hanford Site.

The Department of Natural Resources is steward of Washington's aquatic lands and their resources. Aquatic lands are managed for current and future citizens of the state to sustain long-term ecosystem and economic vitality, and to ensure access to the aquatic lands and the benefits derived from them. Washington DNR's management authority derives from the State's Constitution (Articles XV, XVII, XXVII), Revised Code (RCW 79.02 and 79.105) and Administrative Code (WAC 332-30). As proprietary manager of state-owned aquatic lands, DNR has been directed to manage the lands "...for the benefit of the public" in a manner that provides "...a balance of public benefits for all citizens of the state" that includes"

Encouraging direct public use and access

Fostering water-dependent uses

Ensuring environmental protection, and

Utilizing renewable resources.

In addition, generating revenue in a manner consistent with subsections 1) through 4) of this section is a public benefit (RCW 79.105.030).

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DNR has completed a preliminary review of the project. The project may be located on bedlands and shorelands of the Columbia River owned by the State of Washington and managed by DNR. Your applicant must obtain authorization from DNR prior to building, operating or maintaining structures in the water and air space above state-owned aquatic lands or to harvest seaweed, shellfish, sand, or other resources for commercial use.

To ensure sustainable management of state-owned aquatic lands, DNR has established environmental protection goals. These goals seek to ensure uses of state-owned land do not result in: shading that harms aquatic vegetation and fish migration; compaction, disruption, or impeding the natural movement of sediments; underwater noise that can disrupt important aquatic species when they are most vulnerable; or, release harmful contamination and waste. DNR is committed to working with applicants, in coordination with permitting agencies, to find ways to avoid impacts to aquatic habitats and species on state-owned aquatic land.

If your applicant needs additional information, please have them contact me to discuss the DNR Aquatic Authorization process. I am also available to meet remotely with regulatory agencies to discuss the proposal in an effort to meet mutual goals while avoiding unnecessary expense or delays in the review of project proposals.

Please do not hesitate to call (360) 791-2157 should you need additional information.

DNR reserves the right to comment on future amendments and revisions to this proposal.

Sincerely,

Sherri L. Gallant

Aquatic Easement Manager for Rivers District
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