COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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November 15, 2018

Maia Bellon
Director
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Total Dissolved Gas Standards in the Columbia-Snake River mainstems

Dear Director Bellon:

I am writing to request that the Washington Department of Ecology modify its water quality standards for total dissolved gas (TDG) on the lower Snake and Columbia rivers to implement a feasibility test of an alternate spring spill program. Support for this test has been developing among state, tribal, and federal salmon and dam managers for the last 18 months. This concept is to provide a "win-win" for salmon and renewable energy production and is an important step in the protection of the salmon resource and of tribal interests and investment in salmon restoration. The details of a proposed 2019-2021 operation are available upon request.

The test involves increasing the amount of water routed through spillways and surface weirs at the eight federal dams in the lower Columbia and Snake rivers during hours of relatively low energy demand across the west (about 16 hours per day) and reducing the amount of water spilled during the hours with peak demand (up to eight hours a day). The operation is designed to provide similar, or better, salmon survival rates compared to the court-ordered 2018 operations. It also provides flexible opportunities for the Bonneville Power Administration to generate more power and attendant revenue during high demand times of the day and face the challenges presented to the agency by changes in the electricity market structure. For a discussion of such flexibility needs, see the paper entitled, "Realizing the Value of Bonneville Power Administration's Flexible Hydroelectric Assets" published by the Harvard Kennedy School. https://www.hks.harvard.edu/sites/default/files/centers/mrcbg/files/91_final.pdf

For spring 2019, the operation would involve spill up to 120% TDG measured in the dam tailrace only during the high spill hours. In 2020 and 2021, the high spring spill hours would involve spilling up to a 125% TDG level. We request that Ecology adjust its total dissolved gas standards as necessary to accommodate these new operations between 2019 and 2021. A recent analysis by the Fish Passage Center indicates that previous biological concerns related to gas saturation in the river are not indicated until tailrace TDG exceeds 125%. See Fish Passage Center Memo 58-17, "Ten year review of spill operations, total dissolved gas, and gas bubble trauma monitoring at FCRPS projects (2008-2017)", http://www.fpc.org/documents/memos/58-17.pdf http://www.fpc.org/documents/memos/58-17.pdf. Increased flexibility for fish and power

operations will be necessary to secure the support of key parties for the "win-win" for salmon and renewable energy production that is under discussion and consideration.

We look forward to working with Ecology to secure these modifications.

Sincerely,

Ryan Smith Sr.

Ryan G. Smith, Sr.
Chairman

Cc: Kelly Susewind, Director, Washington Department of Fish and Wildlife
Curt Melcher, Director, Oregon Department of Fish and Wildlife
Virgil Moore, Director, Idaho Department of Fish and Game
Elliot Mainzer, Administrator, Bonneville Power Administration
David Ponganis, Director of Programs, Northwestern Division, U.S. Army Corps of Engineers
Lorri Gray, Regional Director, U.S. Bureau of Reclamation
Dave Johnson, Fisheries Program Manager, Nez Perce Tribe
Paul Ward, Fisheries Program Manager, Confederated Tribes and Bands of the Yakama Nation
Gary James, Fisheries Program Manager, Confederated Tribes of the Umatilla Indian Reservation
Chris Brun, Fisheries Program Manager, Confederated Tribes of the Warm Springs Reservation of Oregon
Bobby Brunoe, Natural Resources General Manager, Confederated Tribes of the Warm Springs Reservation of Oregon