



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

November 15, 2018

Maia Bellon, Director
Heather Bartlett, Water Quality Program Manager
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 and Ms. Bartlett,

I am writing to request that the Department of Ecology (Ecology) adjust its total dissolved gas standards (TDG) on the lower Snake and Columbia rivers on an experimental or temporary basis. This adjustment is necessary to implement a feasibility test of an alternate spring spill program under discussion among state, tribal, and federal salmon and dam managers. These parties are currently exploring an agreement that would govern the alternate spring spill program. This promising development has the potential to provide a “win-win” for salmon and ratepayers, it is consistent with draft recommendations from the Governor’s Southern Resident Killer Whale Task Force, and it would facilitate alignment with Oregon’s TDG. And, by aligning Washington’s standards with Oregon’s, it would simplify implementation of the spill program by the U.S. Army Corps of Engineers.

Under the agreement, the feasibility test of this potential operation would involve increasing water “spilled” in the springtime over the eight federal dams on the lower Columbia and Snake rivers during hours of relatively low energy demand, and reducing it during daily peak demand hours, with specific operations to be spelled out in the agreement. The operation aims for equal or better salmon survival rates compared with 2018 court injunction operations, while also managing power costs at or below the cost of the 2018 court injunction by providing new opportunities for the Bonneville Power Administration to emphasize power generation and attendant revenue during high demand times of the day. Moreover, the agreement holds the promise of offering at least a pause in long-running and contentious litigation over the operation of the federal dams on the lower Snake and Columbia rivers.

For spring 2019, the operation would involve springtime spill up to 120% TDG – measured in the dam tailrace only, although forebay monitors can remain in place – during high spill hours at the four lower Snake River and four lower Columbia River dams. In 2020 and 2021, the flexible

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operation would involve spilling up to 125% TDG, subject to the terms of the agreement, as an additional tool to achieve fish benefits. At both 120% TDG and 125% TDG, operations must accommodate the core principles of the agreement under discussion: salmon benefits, power generation and marketing benefits, and operational feasibility.

I am requesting that Ecology adjust its TDG as necessary to accommodate these new operations between 2019 and 2021, after which the Columbia River System Operations National Environmental Policy Act process and related Endangered Species Act consultations are expected to be completed and in place. I understand that Ecology may undertake two separate analyses to facilitate the agreement: one for 2019 and another for the increase to 125% TDG in 2020-2021.

These higher TDG levels can allow dam operations that hold promise for further improving salmon and steelhead survival rates and for providing flexibility for power generation during times of high demand. Increased flexibility for fish and power operations will be necessary to secure the support of key parties for the “win-win” for salmon and carbon free energy production that is under discussion and consideration.

As these adjusted dam operations will be a new way of running the river, they will require additional monitoring that allows dam operators and fishery managers to observe and respond to any unintended impacts to migrating salmon or other aquatic life. Please work with me and staff at Department of Fish and Wildlife to ensure that a robust monitoring plan accompanies new temporary or permanent TDG standards, especially for the significantly higher spring spill levels anticipated in 2020 and 2021.

Sincerely,



Kelly Susewind
Director

cc: Gov. Jay Inslee
Gov. Kate Brown
Jaime Pinkham, CRITFC
Curt Melcher, ODFW
Virgil Moore, IDFG
Elliot Mainzer, BPA
David Ponganis, U.S. Army Corps of Engineers
Lorri Gray, U.S. Bureau of Reclamation