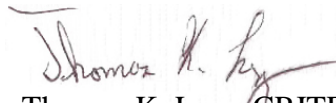



State, Federal and Tribal Fishery Agencies Joint Technical Staff Memo


TO: Paula Calvert, Columbia River Coordinator
Oregon Department of Environmental Quality
811 SW Sixth Avenue
Portland, OR 97201


FROM:


Thomas K. Lorz, CRITFC


David Wills, USFWS


Erick Van Dyke, ODFW


Charles Morrill, WDFW


Sheri Sears, Colville Tribe

DATE: October 8, 2014

SUBJECT: Comments on the Proposed Modification to the Total Dissolved Gas Water
Quality Standard for Mainstem Columbia River

We appreciate the opportunity to respond to your public notice and request for comments on the proposed modification to the total dissolved gas water quality standard for the Mainstem Columbia River. We understand that the proposed modification is limited to the April 1 to August 31 fish passage spill period. These dates are based on the implementation of the Biological Opinion spill program and have remained unchanged since the first waiver was provided in 1995. The draft waiver does include a process to provide spill outside of the designated period, but requires the Corps of Engineers to notify the DEQ of this need in writing one week prior to the spill activity. While this requirement for notification and permission to exceed the 110% total dissolved gas water quality standard outside the April 1 to August 31 time period is no different from past years, we believe that there are new standard operations that take place outside this period that should be included when designating the time period for the waiver modification.

According to the 2014 Fish Passage Plan, beginning March 1, personnel at Bonneville Dam enumerate steelhead kelts at the adult/debris separator. If 2 kelts per day are observed at the separators for 2 consecutive days for a cumulative total of 20 kelts, personnel will notify the Control Room and Project Fisheries, and the Bonneville Powerhouse 2 Corner Collector (B2CC) will be opened to facilitate safe passage of these fish. Dependent on the ambient conditions, the operation of the B2CC can cause TDG to exceed 110% in the tailrace.

In addition, tests have been conducted at The Dalles Dam since 2013 to address uneven adult fall Chinook and steelhead ladder passage by providing additional spill to attract adult fish to the north shore ladder entrance. If adult and jack salmonid counts equal or exceed a specific number of fish per day after August 31, the Project will provide some level of spill for 12 hours between 0400 and 1600 in an attempt to balance adult passage between the east and north fish ladders (TDA-E and TDA-N, respectively). This operation will continue until TDA adult and jack salmon counts fall below the targeted number of fish per day. The operations would likely be implemented in September, subsequent to the termination of fish spill for juvenile passage.

Given that these operations are necessary for fish passage and could be limited or precluded based on TDG, we recommend that the requested dates of the waiver modification be changed to March 1 to September 30 in the Proposed Order to incorporate these ongoing routine fish passage protection measures in March and September. Having these extended dates would enable managers to quickly address the special needs for fish passage just prior to and after the traditional fish passage period described in the proposed order.

Thank you again for the opportunity to submit comments.