

State, Federal and Tribal Fishery Agencies Joint Technical Staff Letter

*Columbia River Inter-Tribal Fish Commission
Idaho Fish and Game
Oregon Department of Fish and Wildlife
Washington Department of Fish and Wildlife
NOAA National Marine Fisheries Service
US Fish and Wildlife Service*

December 12, 2007

Mr. James Adams
U.S. Army Corps of Engineers
Water Quality
1125 NW Couch Street
Portland, OR 97209

Dear Mr. Adams:

The Fish Passage Advisory Committee (FPAC) thanks you for the opportunity to comment on the "Corps of Engineers Plan of Action for Dissolved Gas Monitoring in 2008" (Plan). As communicated by you, the plan is similar to last years' document in format and content. Precisely because of this the finalization of the Plan seems premature given two ongoing processes; the Adaptive Management Team for Columbia River total dissolved gas (TDG) headed by the Washington Department of Ecology (WDOE) and the Oregon Department of Environmental Quality (ODEQ), and the National Oceanic and Atmospheric Administration's (NOAA) 2007 Biological Opinion – Remand Draft on the Operation of the Federal Columbia River Power System, currently out for review. It is possible that the outcome of these two processes may affect the Plan. The FPAC suggests that language be added to the Plan to recognize and accommodate potential changes recommended by these processes.

The comments below refer to specific issues with the current draft of the Plan.

1. The Camus-Washougal monitoring station: The Camas/Washougal monitoring station has been removed from the current ODEQ TDG waiver for gas standards in 2008 and 2009, and hasn't been required by WDOE TDG exemptions for several years. References to this station as a point of monitoring for TDG compliance should be removed from the 2008 plan (Table 1, Phase 2: Instrument Installation, Table 3, and Table 4).
2. There are many monitoring stations operated under the Plan. Some are for TDG waiver/exemption compliance monitoring and some for other management purposes. The purpose of these stations is not stated anywhere in the Plan. We recommend the addition of a column to Table 4 to depict the purpose of each station.

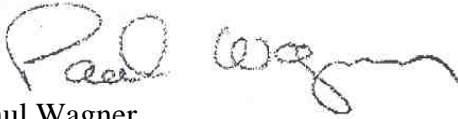
3. The order of table references is not consistent with the table numbering. Table 1 is not referenced at all, but it is the first table encountered. This table appears redundant to Table 4 and is not needed. Table 4 in Sect. 3.0 is the first referenced table, prior to all other table references. Table 3 is referenced next in Sect. 4.1, prior to referencing Table 2 in Sect. 4.2. Table 2 is the last of the four tables to be referenced. We recommend that the table numbering should be consistent with their references, which would make Table 4 become Table 1. This seems appropriate as it is a complete listing of all monitoring stations. This also is the appropriate location to list the purpose of each station (item 2 above).
4. Data quality should be a specified quantitative criterion, rather than relative to a prior year's achievement. There is nothing provided with which to judge the appropriateness of the 2007 data set.
5. Under Section 4.3.1.1, performance checks (beginning on page 8), there is a difference between the number of data quality criteria (four for the Seattle and Portland districts and three for the Walla Walla district) and their specific implementation. This would seem to imply a difference in reliability between the districts. Why aren't there common standards for the basin as a whole?
6. The criteria for emergency field visits (page 10) are listed under performance checks for the Walla Walla district. Are there no emergency criteria for the Seattle and Portland districts, or was this section intended for all districts? Please clarify.
7. A criterion under emergency visits (page 10) states that the gauge has to be malfunctioning for at least 48 hours. This is in contradiction to the previously stated 24-48 hour repair time under Section 4.3.1.1 2 iii, Calibration protocols, Performance Checks (Walla Walla) (page 9). The management of the spill program is critically important to maintaining the successful outmigration of juvenile salmonids listed under the Endangered Species Act. A 24 hour malfunctioning time limit with a repair completed within the next 24 hours should be the criteria, and would compliment the previously stated repair time.

If you have questions or would like further discussion about our comments, please contact Mr. Paul Wagner, NOAA Fisheries, FPAC Chairperson at 503-231-2316.

Sincerely,



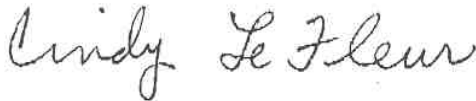
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