



DEC 10 2018

Washington State Senate

December 5, 2018

Becca Conklin
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Scope of Draft EIS for Modification of Total Dissolved Gas Levels

Dear Ms. Conklin,

We appreciate this opportunity to comment on the scope of the draft environmental impact statement for the department's proposal to modify total dissolved gas levels in the Columbia and Snake rivers. As Washington State Senators, we represent people who will be affected by the increased spill at hydroelectric dams that is the intended result of your proposal to adjust TDG.

Our comments can be summarized in three points:

- (1) The immense cost of increased spill should lead the department to conclude that the proposal to modify TDG must be abandoned;
- (2) The process the department has initiated to modify TDG is superfluous due to the ongoing federal Columbia River System Operations review; and
- (3) Modifying TDG carries a high risk of unintended consequences for fish.

We have already seen the major cost impact of increased spill at hydroelectric dams in Washington. The Bonneville Power Administration's average annual cost to meet increased spill requirements exceeds \$38 million.¹ In 2018, BPA redirected \$20 million away from fish and wildlife programs to help cover the cost of spill.² Increasing spill also affects the price of electricity on the wholesale market throughout the Pacific Northwest because it forces hydroelectric facilities to forgo opportunities to produce electricity, resulting in costs that directly translate into higher electricity bills for Washingtonians.

Furthermore, we question the timing and necessity of the environmental review you are initiating. The ongoing federal CRSO review has been accelerated to meet a new 2020 completion date under the Presidential Memorandum on Promoting the Reliable Supply and

¹ Bonneville Power Administration, Final FY 2018 Spill Surcharge (June 21, 2018).

² *Id.*

Delivery of Water in the West.³ It is probable that the federal process will conclude before the department's EIS is complete, meaning the process you have initiated will be moot.

Finally, we call your attention to the important discussion of the unintended consequences of adjusting TDG contained in the minority report submitted to Governor Inslee by Commissioner Pittis and Mr. Chandler as part of the Southern Resident Orca Task Force Recommendations.⁴ The minority report asserts that modifying TDG levels could increase the risk of gas bubble trauma in salmon.⁵ The department must carefully consider how modifying TDG levels might actually work against salmon recovery by creating hazards for the very fish we want to recover.

Modifying TDG levels is a significant policy decision that would have wide-ranging effects for people and fish. Even if your analysis is not superseded by federal actions, we believe that your review will show the costs and flaws of your proposal are too substantial to make it viable by any objective measure.

Sincerely,



Sen. Mark Schoesler
9th Legislative District




Sen. Sharon Brown
8th Legislative District



Sen. Jim Honeyford
15th Legislative District



Sen. Judy Warnick
13th Legislative District



Sen. Tim Sheldon
35th Legislative District

³ Presidential Memorandum on Promoting the Reliable Supply and Delivery of Water in the West (Oct. 19, 2018).

⁴ Southern Resident Orca Task Force Report and Recommendations p.94 (Nov. 16, 2018).

⁵ *Id.*