



Friends *of the* San Juans

360.378.2319
www.sanjuans.org

P.O. Box 1344
Friday Harbor, WA 98250

WA State Department of Ecology

February 27, 2019

Friends of the San Juans strongly supports Washington Department of Ecology's proposed short term modification of the WAC 173-201A water quality standard at the eight lower Snake and Columbia River dams in support of the new regional agreement for flexible spills operation. Allowing increased experimental total dissolved gas levels is expected to help mimic more natural river conditions by speeding passage times and aiding smolts in avoiding dam infrastructure, improving downstream juvenile salmon condition and survival.

Existing scientific studies as well as extensive expert professional opinion supports implementation of this recommended near term salmon recovery action identified as a priority in the Governor's Southern Resident Orca Task Force recommendations:

Goal #1 Increase Chinook salmon abundance.

Recommendation #8. Increase spill to benefit Chinook for Southern Residents by adjusting total dissolved gas allowances at the Snake and Columbia River dams.

(Southern Resident Orca Task Force Report and Recommendations 2018 pg. 48)

It is imperative that all immediately available actions to recover Chinook salmon are implemented and adaptively managed through careful monitoring, while more long term solutions such as dam removal are explored.

We encourage immediate (spring 2019) implementation of this priority management action in support of salmon and orca recovery.

Thank you for your consideration.

Sincerely,

TINA WHITMAN

Tina Whitman
Science Director

Recommendation 8: Increase spill to benefit Chinook for Southern Residents by adjusting total dissolved gas allowances at the Snake and Columbia River dams.