

Palouse Great Old Broads

February 19, 2019

Attn: Becca Conklin, Water Quality Standards Project Manager, and
Maia Bellon, Director, Washington State Department of Ecology

Re: Proposed WA DOE increased spill at 8 Lower Columbia River & Lower Snake River dams

Dear Manager Conklin and Director Bellon:

The Palouse Great Old Broads, whose membership includes residents of eastern Washington and north central Idaho, is one of eight networked Oregon, Washington, and Idaho chapters of the national, 6000-member Great Old Broads for Wilderness. Great Old Broads (GOB) throughout the nation advocate for the protection and preservation of wilderness, wild lands and wildlife dependent upon healthy, pristine environments, streams and habitats.

Currently, a regional and national GOB key focus issue is the plight of threatened and endangered Snake River salmon, steelhead and the related plight of the Salish Sea's endangered southern resident orcas. On a national level, we are engaged in education and advocacy efforts to draw attention to this issue. In light of the looming potential for "endangered" to become "extinct," with respect to Snake River Basin salmon and steelhead and to southern resident orcas, we urge all relative government agencies to take bold, urgent action as backed by sound scientific research to ensure a turn-around in the declining populations of these species. We urge WA Department of Ecology, specifically, to move forward with its proposal to increase Lower Columbia and Lower Snake dam spill to 120% total dissolved gas level beginning in 2019. We further recommend upgrading the water quality rules in 2019 to allow an increase in spill to a 125% total dissolved gas level.

We understand that the WA DOE increased-spill proposal is supported by WA Gov. Jay Inslee's budget and correlates with the recently signed "flexible spill" agreement reached by the states of Oregon and Washington, the Bonneville Power Administration, U.S. Army Corps of Engineers and Bureau of Reclamation. We recognize that the WA DOE proposal has the support of the Department of Fish and Wildlife, the Columbia River Inter-Tribal Fish Commission, and a coalition comprised of the Northwest Sportfishing Industry Association, Columbia Riverkeeper, and fifty-five organizational partners of the conservation coalition Save Our Wild Salmon. With this present letter, we add our Palouse Great Old Broads seventy-one, cross-border members' support.

In our region, all eyes are on salmon and steelhead run projections, fishing season options, and related economic impacts of the decline in wild salmon and steelhead, particularly in the Snake Basin and its main tributaries, the Clearwater River and Salmon River. Residents are also aware of and alarmed by the dire circumstances of the Salish Sea's southern resident orcas as a result of their no longer having plentiful food chinook salmon. According to the Oregon and Washington Departments of Fish and Wildlife February 20, 2019, Joint Staff Report, the Snake River total spring/summer chinook numbers in 2018, which had been projected to be 107,400 fish, numbered 67,596. The forecast total for 2019? Just 48,100 fish. As per the Report, the projected Snake River wild spring/summer chinook number of 18,500 actually came in at only 11,339. The forecast for 2019? A mere 8,200 fish.

The Northwest Power and Conservation Council asserts a goal of overall smolt-to-adult return levels (SARs) in the 2%-6% range, with a 4% average and 2% minimum for federal ESA-listed Snake River and upper Columbia River salmon and steelhead. The Snake River overall geometric mean SAR during 1964-1969 was 4.3% compared to 1.0% during 1994-1999 and 1.1% since 2000. The four lower Snake dams were built between 1961 and 1975.

According to data reported in 2017 by the Comparative Survival Study Oversight Committee and Fish Passage Center, the "smolt-to-adult (LGR to GRA, jacks included) of PIT-tagged Snake River wild spring/summer Chinook had a geometric mean of 0.84% and exceeded the NPCC's minimum SAR objective of 2% in only two migration years (1999 and 2008) during the period 1994-2015. ... SARs (LGR-GRA, jacks included) of the unlisted, reintroduced Clearwater River Chinook were somewhat lower (geometric mean 0.53%). ... the trends in the overall SARs (LGR-GRA) of Snake River wild and hatchery Chinook groups were similar and highly correlated (average $r=0.79$) during 1997-2015."

The Comparative Survival Study Oversight Committee and Fish Passage Center also stated that "... improvements to fish travel time, mortality rates and survival may be possible through management actions that reduce WTT [in-water travel time] and increase spill percentages. There are only two means for reducing WTT: reducing reservoir elevations and/or increasing flow rates. Currently, only the reservoirs in the lower Snake River are maintained near their minimum operating elevations during the fish migration season. The McNary, John Day, The Dalles and Bonneville projects [on the Columbia River] all operate several feet above their minimum operating elevations during the fish migration season. Even without a change in flow levels, the data indicate that there is opportunity to reduce fish travel time and increase survival through the MCN-BON reach if these four projects were to operate at their minimum operating pools. The data also indicate that there is an opportunity to reduce fish travel time and increase survival throughout the FCRPS through increases in spill levels up to the tailrace dissolved gas limits."

Further, "Regional requests and recommendations to increase spill levels to improve survival for juvenile outmigrants have been countered by concerns over potential detrimental effects of high Total Dissolved Gas levels on juvenile mortality rates or survival probabilities. Using a comprehensive data set of instantaneous mortality rates and survival probabilities collected 1998-2016, we found no evidence that high TDG levels were associated with increased mortality rates or reduced survival probabilities."

Finally, the above report concluded that "Pre-harvest SARs in the range of 4% to 6% are associated with historical levels of productivity for Snake River wild spring/summer Chinook." We find ourselves asking, what are humans willing, in good conscience, to not do to rescue wild salmon and SR orcas from the brink of extinction? the brink to which our dams have brought them.

On that note, the Palouse Great Old Broads urge the WA Department of Ecology to, at the least, proceed with increasing spill to 120% total dissolved gas and to take the further step of increasing water quality rules in 2019 to allow 125% total dissolved gas.

Cross-border Washington-Idaho Broad regards,

Cynthia Magnuson and Patricia Jessup, Palouse Great Old Broads Co-chairs

cmcindyidaho@gmail.com
jessup.patricia@gmail.com

USPO: Palouse Great Old Breads, %Borg Hendrickson, 1820 Orchard Ave. Moscow ID 83843