



COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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May 29, 2019

Susan Braley
Water Quality Standards Coordinator
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Braley:

The Columbia River Inter-Tribal Fish Commission (CRITFC) is looking forward to continuing to work with and assist Washington and Oregon to ensure that modifications of their current water quality standards voluntary spill for juvenile fish passage.

Increased spill levels 125% TDG as measured at the hydro project tailraces have proven to benefit migrating juvenile salmon and steelhead. Our conclusion is based on the best available scientific information about the results of spill and the effects of TDG levels. Significant benefits to salmon and steelhead adult-to-survival and adult abundance are anticipated from increased spill and subsequent decreased powerhouse encounter rate. There are frequent periods of involuntary spill at or exceeding 125% TDG, with the data showing that the incidence of Gas Bubble Trauma (GBT) increases do not reach levels of concern until TDG is at or above 130%.

CRITFC's scientists have documented these conclusions based on thorough collection and analyses of the best available information. Some of this work appears in the following reports, which we request to be included in your record:

CRITFC, *Wy-Kan-Ush-Mi Wa-Kish Wit* (2014 Update) p. 130. <https://plan.critfc.org/assets/wy-kan-update.pdf>

Data collected from 1995 to the present still supports the original 1995 risk assessment that levels of TDG up to 125% pose little risk to aquatic species. The higher standard allows for more spill and associated passage survival benefits; the tribes continue to advocate for the higher levels of TDG up to 125% in the tailrace. p. 130

Comparative Survival Study Oversight Committee, Documentation of Experimental Spill Management: Models, Hypotheses, Study Design, and response to ISAB. May 8, 2017.
<http://www.fpc.org/documents/CSS/30-17.pdf>

Combined, these results show no evidence that TDG levels reduce in-river survival over the range of TDG levels that have been observed during 1998-2015, which have ranged up to average levels of 123% and maximum levels of 133% (Figures 3.3 and 3.4). p. 35

Comparative Survival Study Oversight Committee and Fish Passage Center: Comparative Survival Study of PIT-tagged Spring/Summer/Fall Chinook, Summer Steelhead, and Sockeye 2017 Annual Report, December 2017

We have shown that increasing from BiOp to 115%/120% levels could lead to about a 50% increase in return abundances without breach, and spill to a 125% TDG level could lead to about a 2.5- to 3-fold increase depending on productivity and capacity. p. 60

CRITFC would be pleased to meet with the Washington Department of Ecology to address technical or policy matters associated with your proposed rulemaking. In addition, we reiterate CRITFC's commitment to assist with spill effects monitoring described in our letter of February 28, 2019.

Thank you very much for the opportunity to submit these comments.

Sincerely,



Jaime A. Pinkham
Executive Director

Cc: Richard Whitman, Director, ODEQ
Guy Norman, Washington Council Member, NPCC
Ed Bowles, Division Administrator, ODFW
Ben Zelinsky, Senior Policy Advisor, BPA
Tim Dykstra, Northwest Division, USACE