



Nez Perce

TRIBAL EXECUTIVE COMMITTEE

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29 May 2019

Submitted at: <http://ws.ecology.commentinput.com>

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

Re: *Nez Perce Tribe's Scoping Comments on Water Quality Standards Modification to the Total Dissolved Gas Criteria in the Snake and Columbia Rivers*

Dear Ms. Braley:

The Nez Perce Tribe (Tribe) is writing to submit the following scoping comments on the Washington State Department of Ecology's (Ecology's) consideration of modification of the total dissolved gas (TDG) criteria in the Snake and Columbia rivers. The Tribe is accepting Ecology's invitation to consult on a government-to-government basis, and submits these comments in addition to that process.

The Tribe and the Columbia River Inter-Tribal Fish Commission are among those who have requested a modification to this standard. The Tribe has long supported voluntary spill of up to 125% TDG as measured at the tailrace while salmon and steelhead are migrating downstream, based on the best available scientific information about the benefits of spill and the effects of TDG levels. Strong benefits to salmon and steelhead smolt-to-adult survival and adult abundance are anticipated from increased spill and subsequent decreased powerhouse encounter rate (PITPH). There are commonly periods of involuntary spill at and exceeding 125% TDG, with the data and evidence showing that the incidence of GBT increases do not reach levels of concern until TDG is at or above 130%.

The Tribe looks forward to continuing to work with and assist Washington and Oregon to ensure that modifications of the current standards up to 125% TDG are in place in advance of the 2020

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spring spill season (approximately April 1 through June 20). The Tribe invites you to contact our staff (David B. Johnson, Manager, and Jay Hesse, Research Division Director, in the Tribe's Department of Fisheries Resources Management) to discuss this issue.

Sincerely,



Mr. Shannon F. Wheeler
Chairman

cc: Maia D. Bellon, Director, WA State Dept. of Ecology
Heather R. Bartlett, Water Quality Program Manager, WA State Dept. of Ecology
Tom Laurie, Tribal and Environmental Affairs, WA State Dept. of Ecology
Chad Brown, Rulemaking Lead, WA State Dept. of Ecology
Richard Whitman, Director, OR State Dept. of Environmental Quality