

# U.S. Fish and Wildlife Service

Please find our attached comments.



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
911 NE 11<sup>th</sup> Avenue  
Portland, Oregon 97232-4181

In Reply Refer to:  
FWS/R1/AES

MAY 24 2019

Heather Bartlett  
Water Quality Program Manager  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

Subject: Comments on the scope of the Washington Department of Ecology's Environmental Impact Statement relating to proposed rulemaking to revise the Numeric Criteria for total dissolved gas in the Snake and Columbia Rivers.

Dear Ms. Bartlett:

The U.S. Fish & Wildlife Service (Service) appreciates the opportunity to comment on the scope of the Washington Department of Ecology's Environmental Impact Statement (EIS) relating to proposed rulemaking for surface waters of the State of Washington. These comments specifically relate to the proposal to amend the numeric criteria for total dissolved gas (TDG) in the Snake and Columbia Rivers.

The Service recommends evaluating a modified criteria of up to 125% TDG consistent with the 2019-2021 Spill Operation Agreement (Agreement) collaboratively developed by the states of Washington and Oregon, the Nez Perce Tribe, U.S. Army Corps of Engineers, Bureau of Reclamation, and Bonneville Power Administration, and agreed upon in December 2018. This would limit the contemplated increase in TDG (up to 125%) to the juvenile spring migration period (April 3 to June 20) and to no more than 16 hours per day in the tailraces of each of the eight affected mainstem Snake and Columbia River dams.

From the Service's perspective, ultimately adopting a modified numeric criteria for TDG consistent with the Agreement as opposed to an alternative that would allow for 125% TDG year round would benefit bull trout in the Columbia River system by limiting their exposure to the higher TDG rates. A more limited scope would also align with several ongoing state and federal regulatory processes.

The Service looks forward to working with Washington Department of Ecology and other parties involved in this process. If you have any questions relating to these comments, please contact Eric Hein via phone (503-231-2013) or email ([eric\\_hein@fws.gov](mailto:eric_hein@fws.gov)).

Sincerely,

Rollie White  
Assistant Regional Director  
Ecological Services