



**UNITED STATES DEPARTMENT OF COMMERCE**  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
West Coast Region  
1201 NE Lloyd Boulevard, Suite 1100  
PORTLAND, OREGON 97232-1274

May 28, 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 National Marine Fisheries Service (NMFS) 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.

NMFS recommends evaluating a modified criteria of up to 125% TDG consistent with the 2019-2021 Spill Operation Agreement (the 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 NMFS' 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 have several benefits:

- 1) It would limit the TDG increase to the juvenile spring migration period, allowing for the benefits hypothesized for increased spill to target the correct species and life history stages (primarily yearling Chinook salmon and steelhead smolts) and minimizing the potential for adverse effects of increased TDG to non-targeted species and life history stages as well as resident species;
- 2) It would limit the TDG increase (up to 125%) to no more than 16 hours per day, reducing the potential for spill operations to negatively affect tailrace conditions that affect adult fish passage (finding and entering adult fishway entrances), and reducing the exposure of adult salmon and steelhead (which can spend hours or days in the tailraces of mainstem dams before entering fishways) and resident species to 125% TDG; and

- 3) It would align the scope of the criteria modification with the Agreement and with the proposed action that NMFS analyzed in its March 29, 2019 biological opinion for the continued operation and maintenance of the Columbia River System, which would help align several ongoing state and federal regulatory processes.

NMFS 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 Ritchie Graves via phone (503-231-6891) or email ([ritchie.graves@noaa.gov](mailto:ritchie.graves@noaa.gov)).

Sincerely,



for

Michael P. Tehan  
Assistant Regional Administrator  
Interior Columbia Basin Office  
NOAA Fisheries, West Coast Region