

Washington Department of Fish and Wildlife

Hello Jordan,

Under the Evaluation and Findings section number 6) Sediment and Drawdown Impacts, paragraph b and section i, it is stated in the last sentence of the paragraph, canal dredging and drawdown has taken place in late August to early September typically over a 2-3 day period. This is the window of time WDFW would prescribe in-water work to be conducted in a Hydraulic Project Approval (HPA). It is consistent with low flow timing and the fish work window.

In S3 Sediment and Drawdowns under Water Quality Special Conditions, paragraph 3, it states "Furthermore, HTS shall avoid scheduling dewatering events during annual low flow". This request would be in conflict with the HPA from WDFW. This draft 401 is asking for dewatering maintenance work to be conducted at the highest flows possible after spring runoff. From a fish perspective, this could potentially jeopardize any downstream spring spawning (rainbow trout) eggs which are incubating late as well as the potential to harm newly emerged trout when the spring runoff subsides. These tiny juvenile fish would be residing in the habitat on the river edges out of the main flow where sediment could drop out. They prefer the shallow waters and interstitial spaces around the cobbles and rubble at the water's edge to rear for several months. The WDFW prescribed work window (late August- early September) allows native spring spawners time to develop and mature. Generally, a HPA prefers in- water work be conducted when flows are non-existent or at the seasonal lowest. The HPA prescribed work window is in between the times most fish are spawning. With the work window ending in early-mid September, impacts upon fall spawning fish would be limited as well.

In S1 Instream Flow Requirement of the Water Quality Special Conditions it states HTS shall release a daily average flow of 25 cfs as measured directly downstream the dam in the bypass reach to Meyers Falls. This is the minimum? Technically, HTS can release more than an average of 25 cfs daily and still be in compliance with this 401? Lastly, just for clarity, in this paragraph, the bypass reach is identified as the channel below the dam. Is the Meyers Falls side channel also the bypass reach?

Thank you for the opportunity to review and comment. Please contact me if you have any questions.

Leslie King
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