DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NORTHWESTERN DIVISION
PO BOX 2870
PORTLAND, OR 97208-2870

April 6, 2020

Ms. Laura Watson, Director
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Mr. Richard Whitman, Director
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Mr. Chris Hladick, Regional Administrator
U.S. Environmental Protection Agency Region 10
1200 6th Avenue, Suite 155
Seattle, WA 98101

Ladies and Gentlemen:

The U.S. Army Corps of Engineers (Corps) will implement 2020 spill operations for juvenile fish passage beginning April 3rd at the four lower Snake River dams, and April 10th at the four lower Columbia River dams. To accommodate spill for juvenile fish passage at the Corps' eight dams on the lower Snake and lower Columbia rivers, each of your States' water quality agencies have either issued a state water quality standard modification (Oregon; Order Approving a Modification to the Oregon's Water Quality Standard for Total Dissolved Gas in the Columbia River Mainstem (January 24, 2020), https://www.oregon.gov/deq/wq/Documents/columbiaUSACEtmdlorder.pdf), or promulgated a partial-year water quality rule change approved by the Environmental Protection Agency (Washington; WAC 173-201A-200(f)(ii)) for total dissolved gas (TDG). These changes allow spill for juvenile fish passage on the lower Snake and Columbia rivers above each state's water quality standard for TDG (110 percent). In doing so, each state requires that TDG levels be monitored throughout the system. The Corps accomplishes TDG monitoring by relying upon an array of monitoring stations maintained by the U.S. Geological Survey (USGS) throughout the Columbia River System. These stations monitor and collect hourly TDG data above and below each of the eight fish passage dams. The resulting hourly TDG data informs the Corps' juvenile fish passage spill operations at each of the eight fish passage dams.

As a condition of spill for juvenile fish passage up to 125 percent TDG, each state requires biological monitoring for gas bubble trauma (GBT) to identify potential deleterious effects of increased levels of TDG on juvenile salmonids from the fish passage spill operations. Consistent with the states' monitoring requirements, juvenile salmonids are collected at five of the eight dams. These fish are examined at least weekly throughout the

juvenile fish passage season by Pacific States Marine Fishery Commission or Washington Department of Fish and Wildlife personnel for incidence of GBT caused by elevated levels of TDG. If levels of GBT that exceed established state water quality agency thresholds are detected, each state requires the Corps reduce spill for juvenile fish passage.

As of the date of this letter, both the TDG and GBT monitoring activities described above are expected to proceed during the 2020 juvenile fish passage season. The Corps is not currently restricting access of the three listed entities to collect TDG or GBT data at the eight dams, nor is the Corps aware of any restrictions placed on personnel of either entity that would prevent TDG or GBT monitoring and data collection at this time. As a result of the rapidly evolving responses to the COVID-19 pandemic however, required monitoring activities may be interrupted at some point in the near future by restrictions enacted by the federal or state government that would restrict access to each dam, or by the entities that collect TDG or GBT data.

According to each state's current guidance to the Corps for spilling above 110 percent TDG for juvenile fish passage, the absence of either TDG or GBT monitoring during spill for juvenile fish passage would prohibit the Corps from implementing the spill operations described in the 2020 Fish Operations Plan (http://pweb.crohms.org/tmt/documents/fpp/2020/final/FPP20_AppE_FOP.pdf). In that situation, the Corps will implement juvenile fish passage spill operations that ensure spill levels do not exceed state water quality standards. The Corps understands that without TDG and GBT monitoring, the maximum TDG spill levels for juvenile fish passage under both Washington's and Oregon's water quality rules would be 110 percent at all eight fish passage dams. The Corps understands that monitoring for both TDG and GBT was an important consideration from the state water quality agencies, as well as the Environmental Protection Agency, in order to address the uncertainty of impacts to aquatic species.

Again, I want to emphasize that there are no restrictions currently enacted by the Corps that would prevent either monitoring activity from occurring this year. However, given the ever-changing situation surrounding the COVID-19 pandemic, I wanted you to be aware of the potential implications that would arise if either TDG or GBT monitoring activities were interrupted. Please contact Mr. Tim Dykstra at (503) 808-3726 if you have any questions.

Sincerely,

D. Peter Helmlinger, P.E.
Brigadier General, US Army
Division Commander