

**SYSTEM OPERATIONAL REQUEST: #2023-1**

**Walla Walla District**

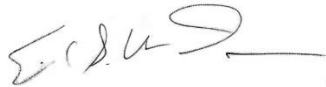
*The following State, Federal, and Tribal Salmon Managers have participated in the preparation and support this  
SOR:*



Jay Hesse, Nez Perce tribes



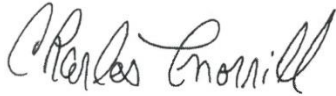
Tom Iverson, Yakama Nation



Eric VanDyke, ODFW



Jonathan Ebel, IDFG



Charles Morrill, WDFW



Tom Lorz, CRITFC

**TO:**

<b>Corps of Engineers Northwestern Division (NWD) WALLA WALLA DISTRICT (NWW)</b>	
<b>TO:</b>	
COL Geoff Van Epps	COE-NWD-ZA Commander
LTC Rick Childers	COE-NWW Commander
Beth Coffey	COE-NWD-PD
Rebecca Weiss	COE-NWD-PDD Chief
Steven Barton	COE-NWD-PDW Chief
Tim Dykstra	COE-NWD-PDD
Julie Ammann	COE-NWD-PDW-R
Doug Baus	COE-NWD-PDW-R
Aaron Marshall	COE-NWD-PDW-R
Lisa Wright	COE-NWD-PDW-R
Jon Roberts	COE-NWW-EC-H
Chris Peery	COE-NWW-OD-T
Lorri Gray	USBR-PN Regional Director
John Roache	USBR-PN-6208
Joel Fenolio	USBR-PN-6204
John Hairston	BPA Administrator
Kieran Connolly	BPA-PG-5
Scott Armentrout	BPA-E-4
Jason Sweet	BPA-PGB-5
Eve James	BPA-PGPO-5
Tony Norris	BPA-PGPO-5
Scott Bettin	BPA-EWP-4

**Tribal Liaisons:** Jr. Inglis (NWD), Dean Holecek (NWW)

**FROM:** Tom Lorz, FPAC Chair

**DATE:** May 11, 2023

**SUBJECT:** Spill operations following GBT criteria exceedance

**SPECIFICATIONS:** We request that Performance Standard Spill be suspended at Lower Granite and Lower Monumental while spill is reduced due to the non-salmonid GBT exceedance below Ice Harbor. This will result in maintaining the 115%/120% TDG spill cap for 24 hours per day.

We further request the COE seek guidance from WDOE on whether there are alternatives to the spill reductions in the current geographic zones identified by the biological monitoring plan. This request is supported by regional managers, including WDFW, for the benefit of juvenile salmonids.

## JUSTIFICATION:

On May 09, 2023, USGS staff observed the first exceedance of the non-salmonid gas bubble trauma criterion since the spill to the 125% TDG limit began in 2020. Specifically, the USGS sample of native non-salmonids included 99 sculpin and 7 pikeminnow with a GBT incidence rate of 26.7%. All fish with GBT symptoms were sculpin. The sample was taken below Ice Harbor Dam.

Spill is currently the primary strategy for ESA-listed fish passage in the Columbia River with well documented benefits for survival. Under the Washington Department of Ecology water quality regulations, reduced spill is applied to an entire zone, in this case all four Lower Snake River dams, rather than only where the GBT criterion exceedance was observed. Yet, the application of reduced spill to all Lower Snake River projects is unjustified because recent samples at other sites in the Snake River have not exceeded WDOE's criteria. The salmon managers have concerns that an important protection for ESA-listed anadromous fish across the entire Snake River Basin has been disrupted due to the impacts of a highly abundant non-listed local population of native fish.

Implementing the current GBT guidelines will reduce spill (Table 1) in the Lower Snake River to levels lower than implemented under the 2018 court injunction (see 2018 Fish Operations Plan) because the Action Agencies plan to continue implementing 8 hours of Performance Standard Spill while reducing the TDG limit for the 16 hours of higher spill. The degradation of fish passage conditions will coincide with peak juvenile salmon and steelhead passage in the Lower Snake River. Our request seeks to restore fish passage operations to the maximum extent possible while still addressing the GBT criteria exceedance below Ice Harbor.

**Table 1: Proposed reductions in spill in the Snake River geographic zone, under the current GBT guidelines, as provided by the COE (D. Turner, personal communication)**

	120/115 TDG	125 TDG
Lower Granite	60 kcfs	80 kcfs
Little Goose	40 kcfs	82 kcfs
Lower Monumental	45 kcfs	84 kcfs
Ice Harbor	90 kcfs	110 kcfs