

FPP Change Form

Change Request Number: 09BON017

Date: 1/28/2009

Proposed by: Rudd Turner

Location of Change: BON section 2.2.2

Proposed Change: Request you refer to the gas caps as 115%/120% TDG limits and not just 120%.

Reason for Change: For 2009 the Corps plans to continue use of the Camas/Washougal gauge to provide 115% TDG limits to set spill along with 120% TDG as measured at the Cascades Island gauge.

Comments from others:

CRITFC- At this time we do not agree with the continued use of Camas/Washougal since it is not required by any of the water quality agencies and the use will limit the ability of the project spill water to safely pass migrants.

NOAA- We do not agree with the use of the Camas/Washougal gauge as a TDG compliance site. We have no problem with a gauge here, however, as long as the state environmental quality agencies are not requiring compliance with the 115% limit at this site, there is no reason to include the 115% TDG language in the Bonneville Dam gas cap.

FPC echoes NOAA.

USFWS- No other project in the FPP describes TDG levels and spill amounts. These details properly belong only in Appendix E where specific operations will be listed. It is very troubling that the Corps wishes to continue to operate Bonneville Dam spill more restrictively than the States of Oregon and Washington TDG waiver/exemptions require, and ignore the recommendations of the fish managers and provide less than the full biological opinion spill benefit allowed.

ODFW- I will not be attending the FPOM meeting this month, but want to convey Oregon's concern over the FPP proposed change 08BON017 regarding the use of the Camas Washougal gage and the 115% TDG limit. Oregon concurs with the concerns expressed in the comments of others (pasted below), particularly the comments regarding operating Bonneville spill more restrictively than the States of Oregon and Washington TDG waver/exemptions require. In the Record of Final Action, I am not clear on what the final action actually amounts to? What is TDS and what are the spill amounts? I see TDG limits, but I don't see any spill amounts in this section.

Record of Final Action:

The changes will not be made, but the TDS and spill amounts will remain in the section.