



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, NORTHWESTERN DIVISION
PO BOX 2870
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REPLY TO
ATTENTION OF

December 17, 2010

Planning, Environmental Resources,
Fish Policy and Support Division

Ms. Becca Conklin
Washington Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Conklin:

The U.S. Army Corps of Engineers (Corps) appreciates the opportunity to propose a revision to the Total Dissolved Gas (TDG) criteria WAC 173-201A-200(1)(f)(ii); and, is providing the following recommendations in response to the surface water quality standards triennial review open comment period through December 17, 2010.

- The Corps suggests adding “including flow augmentation releases” after the words hydroelectric dams. This addition recognizes the use of upstream storage to augment flows, often required to provide adequate flows for fish passage. The revised language would read:

“WAC 173-201A-200(1)(f)(ii) The TDG criteria may be adjusted to aid fish passage over hydroelectric dams, ‘*including flow augmentation releases*’ when consistent with a department approved gas abatement plan. This plan must be accompanied by fisheries management and physical and biological monitoring plans...”

- The Corps suggests removing the word “consecutive” in the second paragraph to reduce confusion and provide consistency with the State of Oregon 2009 TDG waiver criteria. The revised language would read:

“TDG must not exceed an average of 115 percent as measured in the forebays of the next downstream dams and must not exceed an average of 120 percent as measured in the tailtraces of each dam (these averages are measured as an average of the twelve highest ~~consecutive~~ hourly readings in any one day, relative to atmospheric pressure);”

Again, the Corps appreciates the opportunity to provide comments and improve upon the existing rules for clarity and consistency. Please contact Kim Johnson, 503-808-4060, if you have any questions regarding these recommendations.

Sincerely,

David J. Ponganis
Chief, Planning, Environmental Resources,
Fish Policy and Support Division