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MEMORANDUM

TO: Agnes Lut, OR-DEQ
Andrew Kolosseus, WA-DOE

FROM: Margaret Filardo Brandon Chockley

DATE: October 6, 2008

RE: Review of AMT Synthesis Paper

We thank you for the opportunity to comment on the September 4, 2008 Draft “Adaptive Management Team Total Dissolved Gas in the Columbia and Snake Rivers Evaluation of the 115 percent Total Dissolved Gas Forebay Requirement”. We have the following comments for you to consider:

Background

TMDL Overview

Page 11, 5th Paragraph, 1st Sentence – Should be changed to: Spill events can...

TMDL Implementation

Page 13, 3rd Paragraph, 1st Sentence – Should be changed to: ... as outlined in the BiOp through spill levels that generate...

Page 13, 6th Paragraph, 1st Sentence – Should be changed to: Long term compliance with load allocations for voluntary spill will be at...

The Adaptive Management Team

Page 16, 2nd Paragraph, 2nd Sentence – Douglas PUD is misspelled and FPC should be listed as one of the regular non-member attendees to AMT meetings.

Spill Volume Analysis: With and Without the 115 Percent TDG Limit

Page 20, 2nd Paragraph, 3rd Sentence: word “data” after TDG is redundant

Page 20, 3rd Paragraph, 1st Sentence: Should be changed to: ...directly comparing the spill volumes from the different analyses, given the differences in assumptions used for each analysis.

Table 2, Row: FPC, Column: Data Set: For clarification, should mention that over-generation spill was not included in any of the scenarios modeled by FPC.

Table 2, Row: USACE, Column: Data Set: For clarification, should mention that over-generation spill was included in the modeled scenario.

General Comment: It should be noted that the metrics provided in the discussions of the different modeling efforts are different. The figures provided for the FPC analysis present the percent increase in spill for each of the modeled scenarios, compared to the base case. However, the figures provided for the USACE analysis present the different seasonal estimates of percent spill for each of the modeled scenarios. These figures also show an absolute difference between the two scenarios. Given these differences in presentation, it should be made clear that the different figures cannot be directly compared.

FPC Analysis

Page 22, 2nd Paragraph, 2nd Sentence – Typo: delete extra s in first set of parentheses, before “specific”).

BPA Analysis (HYDSIM)

Page 28, 2nd Paragraph, 2nd Sentence – Should be changed to: ...data to generate monthly average flow...

Fish Passage and Survivability Impacts

CSS Study Presented by USFWS

Page 35, 3rd Paragraph, 1st Sentence – We suggest a different way of presenting the conclusion from this presentation:

The conclusion presented was that if percent spill were increased (at a given level of flow), fish travel time would be shorter (both species, both reaches), instantaneous mortality rates would be lower (steelhead: Lower Granite-McNary), and juvenile survival rates would be higher (both species, both reaches). The impact of this increase in percent spill on fish travel time, instantaneous survival, and juvenile survival is dependent on the flow.

NOAA COMPASS Study:

Page 36, 3rd Paragraph, Last Sentence – Should be changed to: Differences in survival presented at the AMT can be found in Table 8 and Table 9.

Page 38, 1st Paragraph, 1st Sentence – Should be changed to: The COMPASS analysis...