FPP Change Form

Change Request Number: 10OVERVIEW001
Date: 01/11/2010 **Proposed by:** Corps, Northwestern Division – Laura Hamilton

Reason for Change: Update the language in the FPP to reflect Oregon and Washington's current water quality standards.

Location of Change: Section 1.5 Total Dissolved Gas Monitoring OV-3 Section

Proposed Change: 1.5. Total Dissolved Gas Monitoring. Both Oregon and Washington states changed their water quality standards which would affect how TDG is monitored and spill is managed. The Oregon state TDG standards require the total dissolved gas (TDG) saturation levels be monitored at just the tailwaters and the Oregon state TDG waiver allow the FCRPS projects to exceed the 110% standard so long tailwaters do not exceed 120% TDG levels. Washington state waiver allow the FCRPS projects to exceed the 110% standard so long as forebays do not exceed 115% and tailwaters do not exceed 120% TDG levels due to voluntary spill provided for anadromous fish passage. The Washington state rule adjustment requires TDG levels be monitored at the forebay and tailrace using the highest 12 consecutive hours TDG for calculating a TDG exceedance. The changes to the state water quality standards were not implemented in 2009 because of the 2008 Biological Opinion litigation. Because of the litigation, the Corps operated consistent with the US District Court of Oregon order, which means the previous TDG monitoring system, with forebay gages and the method for calculating the 12 hour average used in 2007 continued through 2009. These modifications to the state water quality standards will be in effect in 2010. The water quality standard and criterion for TDG developed by the states of Idaho, Montana, Oregon, and Washington, in coordination with EPA, is 110% of saturation at ambient temperature and pressure. The Corps' policy is to operate each mainstem project to meet state standards insofar as physically possible unless other overriding reasons cause temporary deviations. The 2008 NOAA Fisheries BiOp calls for fish spill to be provided at levels that create TDG levels higher than 110% (Appendix D).

Spring freshet river flows above the generation capacity of the FCRPS projects has occurred in the past, causing TDG levels to exceed the 115% and 120% levels. Also, implementation of fish spill requests from fish agencies and tribes has resulted in TDG levels of 120% or greater. Therefore, fish spill implementation will be subject to further coordination with appropriate entities through TMT if excessive TDG levels occur or if evidence of gas bubble disease is observed in fish.

The Corps will take those actions necessary to coordinate with the region and provide spill to protect ESA-listed fish. RCC issues a teletype spill priority list which specifies spill discharge levels and the sequence in which projects are to spill at higher TDG levels in order to manage both spill for fish passage and involuntary spill. The sequence is coordinated through TMT while spill levels are evaluated daily by RCC during the spill

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Deleted: The Washington state rule adjustment requires the total dissolved gas (TDG) saturation levels be monitored at the forebay and tailrace of each mainstem project during the fish passage season. The Oregon state TDG waiver requires the total dissolved gas (TDG) saturation levels be monitored at just the tailwater.

Deleted: State waivers from Oregon and Washington allow the FCRPS projects to exceed the110% standard so long as forebays do not exceed 115% and tailwaters do not exceed120% TDG levels due to voluntary spill provided for anadromous fish passage.

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State of Oregon provided a modification to the TDG standard on June 22, 2007 which¶
applies through the 2008 and 2009 spill seasons. The State of Washington endorsed the¶
Corps' gas abatement plan and adjusted its TDG criteria on February 8, 2008 to¶
accommodate spill to aid fish passage. Washington's criteria adjustment will be in effect¶
through February 2010.

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season and modified as needed in subsequent teletypes. TDG information is provided to TMT and summarized for the year in the Corps' TDG and Water Temperature Annual Report.

The Corps has coordinated with the Bureau of Reclamation on a joint operation of Chief Joseph and Grand Coulee dams to minimize TDG levels. This operation may result in more spill from Chief Joseph Dam (Appendix D). This is a spill management action to reduce TDG below those projects and is not a fish passage operation.

Comments from others:

Record of Final Action: