UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Region
7600 Sand Point Way N.E., Bldg. 1
Seattle, WA 98115

December 1, 2008

Mr. Mark Walker
Director of Public Affairs
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204

Dear Mr. Walker:

Thank you for the opportunity to comment on the September 2, 2008 draft of the Columbia River Basin Fish and Wildlife Program (Program). NOAA Fisheries Service appreciates the Northwest Power and Conservation Council (Council) efforts to amend and update the Program, taking into account numerous current issues and factors affecting fish and wildlife in the Columbia Basin.

I have attached specific comments on the draft Program on these topics: recovery plans, subbasin plans, hatcheries, RM&E, Willamette Basin projects and Federal Columbia River Power System (FCRPS) mainstem operations.

We at NOAA Fisheries Service look forward to working with the Council and its staff on the implementation of the program, including development of the multi-year implementation plans. If you have questions or need clarification, please contact me or Ritchie Graves (for issues concerning mainstem operations).

Sincerely,

Robert G. Walton
Assistant Regional Administrator,
Salmon Recovery Division

Attachment

NOAA Fisheries Service Comments on the
September 2, 2008 draft of the Columbia River Basin Fish and Wildlife Program
December 1, 2008

Using Recovery and Subbasin Plans

The Council should use Endangered Species Act (ESA) recovery plans to guide Fish and Wildlife Program implementation. Thus, the Program needs to clarify how recovery plans and subbasin plans will be considered and included in Program implementation. The Council should indicate its commitment to work with its subbasin planning and recovery planning partners to support coordinated implementation of subbasin plans, ESA recovery plans and other related plans and programs in each subbasin. In particular, multi-year implementation plans need to be developed for all anadromous subbasins; this will provide an important opportunity to integrate ESA recovery plans, FCRPS Biological Opinion (BiOp) requirements, Columbia Basin Accords, and local subbasin plans. In order to focus on implementation, we recommend the Council not embark on another lengthy subbasin planning process. Instead, consider a process that updates the management plan portion of subbasin plans by incorporating new recovery planning and other information that is timely enough to assist in development of multi-year implementation plans and inform 2010 project level decision making.

In addition, the Council should mention that ESA regulatory reviews will be required for actions that may affect listed species. For example, Columbia Basin hatchery programs are scheduled for ESA review and consultation according to the 2008 FCRPS BiOp.

Hatcheries

The section on Artificial Production Strategies, Primary strategies (page 31) in the draft Program contains language that deviates somewhat from Hatchery Science Review Group (HSRG) and other sources of hatchery reform principles and recommendations. Please consider this alternative language for the first paragraph:

> "Artificial production can be used under either an integrated or segregated strategy. Integrated strategies can be used in a manner to complement habitat improvements by supplementing native fish populations with fish that are as similar as possible in genetics and behavior to wild native fish, as a safety net to assure preservation of the target population, and/or for harvest. Segregated strategies are generally managed to provide harvest and have limited or no conservation objectives and can be used when viability of nearby natural populations is not put at risk or to replace lost salmon and steelhead in blocked areas."

On p. 31, line 24 should indicate that the Council will consider standards for hatchery programs, based, *in part* on recommendations from the HSRG.

On page 33 under "Harvest Hatcheries" consider this alternative language: "...Hatcheries must be located and operated in a manner that does not *threaten viability of*... other stocks...."

On page 33 under Artificial Production Strategies, the language pertaining to Restoration should be clarified. It could be interpreted, as written, that supplementation is not appropriate for reintroductions in blocked areas. In fact, supplementation is being appropriately used to reintroduce anadromous fish into some blocked areas. It is also appropriate to note that artificial production may be used for the purpose of *preserving,* as well as rebuilding, natural runs.

RM&E

Strengthen relationship of the Program's monitoring, research, evaluation and reporting strategies to ESA recovery plans and related efforts. Consider adding this sentence to the second paragraph on page 43: "Monitoring, evaluation, research and reporting activities in the program that are related to ESA-listed anadromous fish species will be closely coordinated with related efforts of NOAA Fisheries Service, the FCRPS Action Agencies and their state, tribal and local partners in recovery planning and implementation."

Estuary

On page 55, under Estuary Strategies:

Add "but are not limited to:" after "Such strategies may include:"

Amend the first bullet to read: "Habitat protection and restoration work such as removal or lowering of dikes and levees that block access to habitat or installation of fish-friendly tide gates, protection or restoration of riparian areas and off-channel habitat and removal of pile dikes."

In the third bullet, delete "through the mainstem hydropower dams" and add "in" because this section is about the estuary, not the dams.

Add a new bullet: "Manage and reduce avian, piscine and pinniped predation on salmonids" unless it is included elsewhere.

FCRPS Operations

The Program should indicate support for a relaxation of "hard" summer refill requirements at storage reservoirs – with the exception of Dworshak Dam (and reservoir) which is drafted to control summer temperatures in the lower Snake River. Our concern is that driving projects to refill would further reduce flows for large proportions of actively migrating juvenile fall Chinook salmon in the Snake and Columbia Rivers (in June and early July). NOAA Fisheries Service supports a more balanced approach that considers in-season information. We would accept the possibility that this might result in occasionally missing refill at some projects by small volumes or that the actual date of refill might be earlier or later than the planning dates.

We offer the following suggested revisions to language in the Mainstem Strategies in the Overarching Strategies section.

Page 67, Overarching Strategies Bullet 2 "Protect wild fish" is too broad, as this would include "wild" non-native species, or other predatory species like pikeminnow that the region is actively reducing in number.

This statement is misleading: *"Early results appear to show that removable spillway weirs can provide the same benefits as baseline spill but use one-tenth of the water. This constitutes a considerable savings in terms of hydropower generation."*

While it is true that these structures pass a high proportion of steelhead, the efficiency of these passage routes is substantially less for Chinook and is largely unknown, though probably also less for sockeye salmon. In addition, the comment appears to hold out the largely false hope that these structures could be operated in isolation – without substantial amounts of training spill. NOAA Fisheries Service believes, based on the available

information, that this is not the case. Without sufficient training spill (which varies for each project) and carefully crafted spill patterns, tailrace egress conditions would be poor and result in high mortality rates due to predation (both avian and piscivorous). However, NOAA Fisheries Service agrees that these structures are important tools for achieving the dual goals of safe juvenile passage and long-term compliance with Clean Water Act total dissolved gas standards.

Pg. 74 "c. Juvenile and adult passage, in general". In the first bullet, the focus is overly restrictive on just "concrete passage" for achieving adult passage performance standards. For example, NOAA Fisheries Service believes that, based on numerous studies, substantial impacts are occurring in the immediate forebays at some projects. Restricting actions to "passage through mainstem dams" is likely to miss some important opportunities to improve juvenile survival.

Pg. 75, "d. juvenile fish transportation." Fourth bullet. Unless the region is willing to tag very large numbers of Snake River and Hanford Reach fall Chinook salmon for this purpose, evaluations to determine whether or not transporting or returning juveniles to the river is the best strategy at McNary Dam (in terms of returning adults) will likely continue to be inconclusive. NOAA Fisheries Service provided a summary of the information currently available to the Regional Forum Technical Management and Implementation Teams in 2007. Most studies conducted at McNary are based on tagging Hanford reach fish. Based on four years of study, it is our view that transportation at McNary provides little benefit until late July or even August – which is reflected by the McNary transport operation in the 2008 FCRPS BiOp. Much less is known about the effect of transporting Snake River fall Chinook at this project.

Pg 77, "3. Spill." This does not seem to recognize that our 2008 FCRPS BiOp essentially calls for no transport of spring migrants at McNary Dam with the exception of an extremely low flow year – similar to that experienced in 2001.

Pg. 78, "4. Surface Passage Systems and New Fish Passage Technologies." Does not appear to recognize that surface passage routes will be installed and operational at each of the mainstem dams (considering the ice and trash sluiceway at The Dalles Dam as a surface passage route) at the start of the 2009 outmigration. The current focus is on proper placement of these structures and on the development of training spill patterns to assure that survival through these routes are high.

Pg. 79, "5. Juvenile Bypass Systems." The last sub-bullet regarding spill deflectors seems misplaced in a discussion of juvenile bypass systems.

Pg. 80, "6. Adult Passage." Bullet one (sub-bullet 3). NOAA staff would NOT recommend the use of ladder counts for conversion rate analysis simply because the origin of these fish is unknown. NOAA supports using known-origin PIT tagged fish to assess conversion rates of adults through key reaches of the mainstem Snake and Columbia Rivers. The 2008 FCRPS BiOp calls for increased tagging – especially in the Upper Columbia in part, to provide more PIT-tagged adults to enhance future adult conversion rate analyses.

Pg. 84, "Spring reservoir/flow operations in general. Last sentence on page (second bullet) appears to be cut off... "the Council understands as..."

Pg. 93, "Mainstem Monitoring and Evaluation." Footnote 15 should not reference RPA No. 51 of the 2008 FCRPS BiOp. The standards and metrics (see following comment) are described in the preamble of the Research, Monitoring and Evaluation Strategy 2—Hydrosystem Research, Monitoring, and Evaluation on pg 72.

Pg. 94, "13. Research." Approach to prioritizing research and proposals; first bullet. This bullet references 'juvenile or adult dam passage survival performance standards – only the first of which is fully consistent with our 2008 FCRPS BiOp. This document (see RPA Table - RM&E Strategy 2—Hydrosystem Research, Monitoring, and Evaluation on pg 72-73) requires four standard metrics be met. These are: Juvenile Dam Passage Performance Standards, Juvenile In-river Survival Performance Metric, Juvenile System Survival Performance Targets, and Adult Performance Standards.

When discussing broad protective objectives and elements, the Program should be more precise in its use of words like "resident," "wild," and "native." Our concern is that there are many resident, wild, and native populations that impact or could impact listed and other species.

For example, on page 65, is it really the Council's intent to improve the survival of all resident fish in the mainstem - even predatory species like pikeminnow and smallmouth bass, as well as non-native species like shad?

Willamette Projects

The Program should note the biological opinion for the Corps' Willamette River projects and other actions in the Willamette that will be implemented in the coming years.