



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
525 NE Oregon Street
PORTLAND, OREGON 97232-2737

F/NWR5

February 26, 2001

Mr. Steven Wright
Acting Administrator
Bonneville Power Administration – MG
905 NE 11th/PO Box 3621
Portland, OR 97208-3621

Dear Mr. Wright:

The National Marine Fisheries Service (NMFS) sends this letter as a companion to our comments due today to the Northwest Power Planning Council (Council) on their 2001 high priority project solicitation. The high priority project solicitation was for projects that could be implemented immediately to benefit listed Columbia River salmon and steelhead. The criteria for this solicitation were developed prior to completion of the December 2000 Federal Columbia River Power System Biological Opinion (FCRPS BiOp) and with the understanding that the BiOp would call for additional actions to be initiated and implemented in fiscal year 2001.

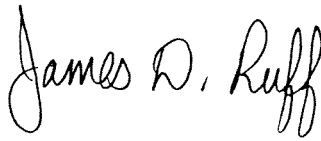
The FCRPS BiOp calls for a number of actions to be implemented in 2001 that were not addressed by the high priority solicitation. The enclosure to this letter summarizes these actions. These actions are important and urgent and include the development of additional habitat activities, salmon and steelhead marking planning, safety net actions, research and monitoring, and formation of the Interior Columbia Technical Recovery Team. It is possible that some of these needs can be addressed in the rolling provincial review solicitations for 2001, depending on their schedules. Others do not fit within any specific province and need immediate attention in order to meet timeframes established in the BiOp.

NMFS notes that the actions in the enclosure apply primarily to the Bonneville Power Administration (BPA). The other action agencies' obligations are not emphasized here only because we wanted this letter to coincide with our comments on the high priority projects. It is important that BPA consider all of its FY 2001 obligations together as a package. We will provide similar input to the U.S. Bureau of Reclamation and the U.S. Army Corps of Engineers in the very near future.



We are willing to work with BPA, the Council and the other action agencies to determine how best to proceed with 2001 implementation. We are certain you share our interest in moving expeditiously toward recovery of threatened and endangered salmon and steelhead in the Columbia River Basin. On our part, NMFS will expedite, to the extent possible, any ESA reviews, consultations, or permitting work necessary to implement the projects we are recommending for 2001 funding.

Sincerely,

A handwritten signature in black ink that reads "James D. Ruff". The signature is written in a cursive style with a large initial "J".

for

Brian J. Brown
Assistant Regional Administrator
Hydro Division

Enclosure

cc: Larry Cassidy, NWPPC
Federal Caucus Agencies
Brian Allee, CFWA

ENCLOSURE

Research Projects

Three project proposals addressing specific RPA needs were developed by NMFS and submitted through earlier CBFWA/ISRP/Council review processes (Innovative and Columbia Gorge). Two of these projects, *Salmonid response to fertilization: an experimental evaluation of alternative methods of fertilization* (proposal no. 22047; RPA Action 183) and *Reintroduction success of steelhead from captive propagation and release strategies* (proposal no. 22064; RPA Action 182) were submitted under the "Innovative" solicitation. They were rated numbers 8 and 12 respectively by the ISRP but were not recommended by the Council for funding. The third project, entitled *Evaluate hatchery reform principles* (proposal no. 21024, RPA Action 184), was submitted under the Columbia Gorge Provincial Review Process. The ISRP indicated concerns with the study design and NMFS has responded to those concerns. However, we are uncertain about the current status of the project in the Council Process. We believe these projects are of sufficient priority and/or urgency relative to the BiOp that they need to go forward immediately. NMFS has been in discussions with both the Council and BPA regarding how to best proceed with implementing these projects and will continue to urge their immediate implementation under the Biological Opinion.

Artificial Propagation

Several artificial propagation actions (RPA's) in the BiOp were specifically identified for implementation in 2001. The proposals currently being reviewed under the Council's "High Priority" solicitation do not address all of these immediate needs; the following artificial propagation actions are needed to address the rest of the immediate requirements. Other high priority actions such as development of Hatchery and Genetic Management Plans can be addressed in the Provincial review and/or 1- and 5-year BiOp planning processes.

Action 174: Working through regional prioritization processes to the extent feasible and in coordination with NMFS, BPA shall collaborate with the regional, state, Tribal and Federal fish managers and the Pacific States Marine Fisheries Commission to enable the development and implementation of a comprehensive marking plan. Included in this action are the following four steps: *(note: only the two steps identified for 2001 implementation are shown below)*

1. Develop a comprehensive marking strategy for all salmon and steelhead artificial production programs in the Columbia River basin by the end of 2001.
2. Provide funding by March 1, 2001 to begin marking all spring chinook salmon that are currently released unmarked from Federal or Federally funded hatcheries.

RPA Action 174-1 requires BPA to develop a basin-wide marking and sampling strategy, the first step needed to assure accurate monitoring of the status of wild fish populations and the transition to selective fisheries. This work must begin immediately to ensure a coordinated approach to the marking and sampling of fish production. It will require consideration of

numerous factors such as marking technologies, selective fisheries, technical (analytical) issues to assure continued ability to monitor coast-wide fisheries, coordination with many agencies and tribes, etc.

RPA Action 174-2 requires funding to ensure that all spring chinook currently in Columbia basin hatcheries are marked prior to release. Existing hatchery biological opinions require either 1) marking all their spring chinook production when closely associated with natural populations or 2) marking a representative sample of their production when the program is believed to be isolated from natural populations. This RPA action is designed to mark fish currently not required under hatchery biological opinions. Only a few programs in the Columbia Basin will be affected. This will provide greater certainty in monitoring wild fish status and enable future selective fisheries.

Action 175: BPA shall, in coordination with NMFS, USFWS, and the relevant state and Tribal comanagers, fund the four-step planning process described above as quickly as possible and, if so determined by that process, implement safety-net projects as quickly as possible at least for the following salmon and steelhead populations: 1) A-run steelhead populations in the Lemhi River, main Salmon River tributaries, East Fork Salmon River, and Lower Salmon River; 2) B-run steelhead populations in the Upper Lochsa River and South Fork Salmon River; and 3) spring/summer chinook populations in the Lemhi, East Fork, and Yankee Fork Salmon Rivers, and Valley Creek.

The discussion for RPA Action 175 indicated that the four-step safety net planning process for populations identified in the RPA be completed by the end of 2001 so implementation of high-priority, safety-net action can begin with brood year 2002 as described in the BiOp. The entire safety-net concept is rooted in urgency; actions must occur quickly to prevent further deterioration in the status or extinction of these populations. NMFS, with its own resources, is currently funding work to help define the administrative, process, and organizational details needed to provide guidance for conducting the specific assessments and analysis called for in the four-step planning process. However, the actual planning and implementation of individual safety-net programs is clearly defined as a BPA responsibility in the RPA.

Action 179: The Action Agencies and NMFS shall work with affected parties to establish regional priorities within the congressional appropriations processes to set and provide the appropriate level of FCRPS funding to develop recovery goals for listed salmon ESUs in the Columbia River basin. Tasks shall include defining populations based on biological criteria and evaluating population viability in accordance with NMFS' viable salmonid population approach. These tasks shall be completed by 2003.

Collect and analyze genetic samples of Entiat River spring chinook salmon. There is currently great uncertainty concerning the specific composition of Entiat River spring chinook salmon, which has resulted in indecision regarding appropriate management and recovery efforts. Action 179 identifies the need to gather empirical population data for establishing management and recovery goals for listed salmon. This action will provide critical missing information to help

guide recovery efforts for Upper Columbia River spring chinook which are one of the most at risk ESUs.

Habitat

The following habitat actions are components of a habitat strategy intended to accelerate efforts to improve survival in priority areas in the short term, while laying a foundation for long-term strategies through subbasin and watershed assessment and planning. Scheduling and funding considerations described in the FCRPS biological opinion are included.

Tributary Actions

- Action 149** This action is intended to address water diversion issues (flow, passage, and screening) in priority subbasins. While the Bureau of Reclamation has primary responsibility for this initiative, BPA is expected to supply funding for passage, screening, and water for flows to complement the BOR actions as needed in 2001, especially in the Methow, Upper John Day, and Lemhi Basins. BPA and BOR should coordinate funding plans to ensure a fast start on these measures in 2001.
- Action 151** BPA is to experiment with innovative ways to increase tributary flows by, for example, establishing a water brokerage through a new or existing non-profit entity. BPA is to begin these experiments as soon as possible. Funds will be needed to establish the entity in 2001, develop an operations plan, and conduct a trial round of water transactions, estimated to cost \$2.5 million in 2001. Moreover, NMFS and BPA are exploring the need for development of a methodology for ascertaining instream flows that meet ESA requirements during 2001, and sufficient funds (~\$500,000) should be reserved for that purpose. Finally, given expected dry conditions in 2001, extra provision should be considered to protect and restore water in critical tributaries.
- Action 153** BPA is to work with agricultural incentive programs to negotiate and fund long-term protection for 100 miles of riparian buffers per year. BPA and NMFS will develop criteria for this program by June 1, 2001. Transactions in 2001 should be anticipated.
- Action 154** See comment in R, M & E section
- Action 155** BPA, as step one in a mainstem habitat program, is to work with the BOR, the Corps, EPA and USGS to identify mainstem habitat sampling reaches, survey conditions, describe cause-and-effect relationships, and identify research needs. Thereafter improvement plans must be developed and implemented. Funding for at least the first step should be anticipated in 2001.
- Action 156** BPA is to lead a feasibility study to improve spawning conditions for chum salmon in the Ives Island area. Funding for this work should be anticipated.

Action 157 BPA is to fund actions to improve and restore tributary and mainstem habitat for CR chum salmon in the reach between The Dalles Dam and the mouth of the Columbia River. Funding for surveys should be anticipated.

Actions 158-162 Although the Corps is the lead agency, BPA is to participate in planning and fund several estuary-related actions. In particular:

- An action plan to inventory estuary habitat, model physical and biological features of the estuary, identify limiting factors, identify FCRPS impacts on the estuary, and develop criteria for estuarine habitat restoration. Cost-share funding for this work should be anticipated (Action 158).
- Working with the Corps and LCREP, develop and begin implementing a 10-year estuary restoration program in 2001 (Action 160). Cost-share funding to begin this work should be anticipated.
- BPA and the Corps are expected to fund a monitoring and research program to address the estuary program (Action 161). Cost-share funding to begin this work should be anticipated.

R, M, &E

In order to have adequate information to evaluate the effect of required actions at the scheduled check-ins, it is extremely important that these actions and their associated monitoring programs be implemented in the very near future. While the actions identified as high-priority have covered many important areas, there are several areas (both geographically and conceptually) that have not yet been addressed. It will be extremely important for the action agencies to implement actions in the following arenas soon:

1. Actions targeted at Upper Columbia ESUs. While several lands acquisitions are proposed in the Upper Columbia, each will maintain the status quo. It will be important to develop monitoring and evaluation programs for additional actions that improve conditions for ESUs in this area.
2. Several early actions in the habitat arena not covered by these proposals must be addressed: addition of marine derived nutrients, water quality, and sediment reduction. Affects on water quality and sediment reduction will both be addressed indirectly through some of the riparian restoration activities. Additional actions aimed at these environmental conditions, such as road closures, should also be implemented and monitored.
3. Development of recovery goals:

Action 179 Action Agencies and NMFS shall work with affected parties to establish regional priorities within the congressional appropriations processes to set and provide appropriate level of FCRPS funding to develop recovery goals for listed salmon ESUs in the Columbia Basin.

This BiOp action requires recovery goals to be established for listed Columbia Basin ESUs within 3 years. Two recovery domains were established for the Columbia Basin; the Interior

Columbia and the lower Columbia/Willamette. Thus two Technical Recovery Teams (TRTs) are needed. The BiOp provides a schedule for initiating a TRT for the Interior Columbia Basin recovery domain. NMFS has already established a TRT for the lower Columbia/Willamette recovery domain, however, that TRT's efforts are lagging, due in part to the lack of funding for non-NMFS participants. To succeed with establishing recovery goals, the best possible scientists with applicable expertise need to be funded and dedicated to the TRT tasks. To stay on the schedule set in the BiOp, the Interior Columbia TRT must be solicited in early March 2001. BPA, together with the other Action Agencies, is expected to share in the funding to cover the cost of participation of non-NMFS TRT members of both the Interior and lower Columbia TRTs beginning in 2001. These efforts will be coordinated with the subbasin planning and assessment efforts identified in Action 154.

4. Coordinated watershed assessments:

Actions 154 and 179

The FCRPS BiOp clearly recognizes the importance of coordinated watershed assessments as the basis for recovery planning and the implementation of actions aimed at achieving off-site mitigation goals for the FCRPS. The BiOp calls for planning to be completed for ESU priority subbasins by the 2003 check-in date. The BiOp also identifies the desirability of coordinating assessment and planning activities at the regional, state and local levels. Meeting the timelines set out in the BiOp will require an efficient, dedicated effort to carry out sufficiently detailed watershed assessments and to provide coordinated technical support to subbasin planning efforts. Given the time lines in the BiOp and the number of subbasins and jurisdictions involved, it is important that coordinated efforts to develop watershed assessments be stepped up as soon as possible.

Additional 2001 funding will be necessary for specific technical assessment tasks supporting both the TRT efforts (to identify recovery goals and limiting factors) and the initial steps in developing subbasin plans. Such projects include ongoing watershed assessment activities through the NWPPC's Regional Assessment Coordinating Committee aimed at compiling and analyzing subbasin data following an agreed upon template and a project coordinated through ODFW for the compilation and assessment of fish and habitat data for the Willamette and Lower Columbia subbasins. NMFS has been working with tribal, state and NWPPC technical staff on a coordinated approach to more detailed assessments of upper Columbia basins that should begin in late spring or summer of 2001.