# Fish Passage Plan (FPP) Change Request Form

**Change Form # & Title**: 19MCN001 – Revise Section for Work Near Fishways

**Date Submitted**: Originally submitted Nov 2017; Last revised 10/18/2018

**Project**: McNary Dam

**Requester Name, Agency**: Ann Setter, Corps

**Final Action:** **WITHDRAWN – 2/7/2019**

**FPP Section**: Section 2.1. Fish Facility Operations - General.

**Justification for Change**: In the FPP, a paragraph was added in 2015 in section 2.1 indicating that construction activities will not occur within 100 ft of fish ladders during the fish passage season unless coordinated. Research was undertaken at Lower Granite to determine if there was merit to the assumption that non-routine maintenance work within 100 ft of fishways was discernable over routine baseline noise and vibration.

Study findings did not detect any difference in transit rate through the adult ladder. While transit rate was similar, exit and passage success was higher when vibration levels were below the threshold. Due to this finding, NWW proposes revising the language at NWW projects to be specific that activities with vibration levels above 80 dB require coordination.

**Proposed Change**:

**2.1.2. Work Near Adult Fishways:** Research, non-routine maintenance, and construction activities that cause vibration levels above 80 dB will not be conducted within 100' of any fishway entrance or exit, within 50' of any other part of the adult fishway, or directly in, above, or adjacent to any fishway, unless coordinated with FPOM or FFDRWG by the Project, District Operations and/or Planning or Construction office.

**Comments**: *(listed in order from oldest to newest)*

1/10/18 – email from Trevor Conder, NOAA: “Exit and passage success rates were significant for Steelhead and Fall Chinook, and the differences were substantial in some cases (see tables 12 and 13). To me, these important metrics indicate construction noise and vibration are still important considerations, but I'm always willing to discuss and refine as needed.”

1/11/18 – FPOM Meeting: Recommendation is to modify the section 2.1.1 to be more specific about types of activities and thresholds that require coordination. Setter will work with Conder, Lorz, project staff, and others to develop language.

7/11/18 – email from Ann Setter, Corps NWW: “Based on our conference call yesterday, I have revised Section 2.1.2 of the FPP to address our discussion and our proposed revision for the FPP language change. Please let me know if you have any further recommendations or comments by July 25. Shortly after that time I will plan to distribute the document to the Regional fishery reps for discussion at the August FPOM meeting.”

7/25/18 – email from Ann Setter, Corps NWW: “Attached is a revised FPP change form for review and comment. We will plan to discuss at August FPOM meeting.”

8/9/18 – FPOM Meeting: Conder has concerns about the list of equipment. A rotor drill with less than 2” bit isn’t included but is a very loud piece of equipment. The language is not quite right yet. NWW thought it would be easier to define what actions require coordination versus defining those that don’t. This topic might need a phone call discussion. Conder will send comments.

9/10/18 – email from Trevor Conder, NOAA: “Here is the bottom line to me. I reread the report and it clearly shows there is a negative response to the vibration above the threshold. Yes there are other activities that cause vibration but that does not mean that adding vibration is not going to make a difference, so I am not willing to accept any language that states that vibration is not an important consideration. I would however be willing to adopt some language that allows construction activities using light duty equipment that has been demonstrated to not exceed the vibration threshold at certain distances. If it can be demonstrated that the equipment will not exceed that, I am fine with a programmatic approval. However, if this is in question and the equipment is heavy duty or untested for vibration, what is the harm with FPOM coordination to ensure impacts aren’t going to affect fish? We hardly ever see these MOC’s going through anyway, and when they do it for something that is pretty important (LGR bypass, TDA AWS) that we should be advising on. So I do not feel compelled to modify the current criteria until more info is provided on vibration levels associated with certain equipment, or some much more risk adverse language is added to the criteria.”

10/18/18 – email from Ann Setter: “Trevor: Thanks for providing comments specific to your ongoing concerns. I spoke with project maintenance staff specific to the 2" bit existing language and that size bit was the threshold where hydraulic eqpt is required versus power hand tools, ie bit size greater than 1.5 inches. I think we are still struggling to revise the language to something people on the ground can relate to, and most of them are not equipped with noise vibration sensing eqpt routinely as they undertake project work. I think that perhaps we could support a change that modifies the existing language to something like: “*Research, non-routine maintenance, and construction activities that cause vibration levels above 80 dB shall not be conducted within 100' of any fishway entrance or exit, within 50' of any other part of the adult fishway, or directly in, above, or adjacent to any fishway, unless coordinated with FPOM or FFDRWG by the Project, District Operations, Planning, or Construction office.*” If you can agree to this language, we can again bring this change form back to the broader FPOM group for their consideration and concurrence.”

 12/20/18 - email from Trevor Conder: “Ann, It sounds like we need some information or research on what type of activities construction activities exceed the threshold. Otherwise, implementation will just be a guessing game.”

 2/7/2019 FPP Meeting: After much discussion, the consensus was to withdraw these change forms and stick with the original language.

**Record of Final Action**: WITHDRAWN