State, Federal and Tribal Fishery Agencies Joint Technical Staff Letter

Columbia River Inter-Tribal Fish Commission Idaho Department of Fish and Game Oregon Department of Fish and Wildlife Washington Department of Fish and Wildlife

September 23, 2008

Bernard Klatte, Chairperson Fish Passage Operations and Maintenance USACE Portland District P.O. Box 2946 Portland, OR 97208-2946

James Adams, Chairperson
Technical Management Team
USACE Northwestern Division
Columbia Basin Water Management Division
1125 N.W. Couch Street
Portland, Oregon 97209-4142

Dear Mr. Adams and Mr. Klatte,

Over the course of the season, several requests have been made to alter the operations at the projects to assist non emergency work. Theses requests have raised the need to review the coordination process for changes to in-season operations. There is an established in-water work period at all of the projects that is specifically designed to allow work to proceed without impact to the salmon migration. While the salmon managers are committed to working with the Action Agencies to address these needs, we are concerned that the frequency and number of requests to perform non emergency work outside of the in-water work window has been increasing. There have been numerous requests through the Fish Passage Operation and Maintenance Group, (FPOM), and the Technical Management Team (TMT), for changes in operations. While we understand that emergencies do arise, much of this work could be delayed. We would recommend that the Action Agencies make every effort to confine work to the in-water work period and only address true emergency operations during the migration period.

In addition to the frequency of the work requests, the salmon managers are also concerned that the requests are presented with little time for adequate review. For example, there was a request to switch from a 60% spill day at McNary dam on Friday August 15, 2008 to a 40% spill operation to insure that, if needed, there would be additional flexibility for the generation system. The notice was received mid afternoon Thursday August 14, 2008. This short time frame allowed for very little review. In addition, the Salmon Managers normally convene the Fish Passage Advisory Committee to discuss the request among the salmon managers and short time

frames preclude this process, as well as the standard regional review process which was formed in part to deal with such issues. While we understand that emergency issues do arise with short turn around time, we do not feel that this situation met that criterion. There was no emergency and the conditions had been forecasted several days, if not more, in advance. However, if there was a need to make these unplanned changes to the hydro system then had this issue been brought to the attention of the salmon managers sooner, we could have discussed this issue and reviewed all alternatives that would met the needs of the action agencies as well as reducing any biological impact associated with the change in operations. Several salmon managers voiced concern with the suggested operation. We noted afterwards that the change in operations was not implemented.

We again stress that the salmon managers are committed to working with the action agencies to reduce the impact of emergency operations on the salmonid migration. We strongly encourage the Action Agencies to be proactive when there is a possibility for unplanned changes in the set operations for the hydro system, as well as insure work scheduled to occur in-season does not pose an impact fish passage. Lastly, any work that will modify operations needs to be brought to the attention of the salmon mangers in a timely manner to insure adequate time for review and analysis of alternatives.

Sincerely,

Tom Lorz

Thomas M. Ly

Columbia River Inter-Tribal Fish Commission

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