

**USFWS Comments on the Spring / Summer Update
to the 2002 Water Management Plan
05-21-02**

The USFWS would like to add the following comments on the “Hanford Reach” section of the *Spring / Summer Update to the 2002 Water Management Plan* to comments which were submitted on January 23, 2002. Attached, is the “Hanford Reach” section from the Management Plan with suggested revisions indicated in red and underlined. Following is a brief discussion regarding the “2002 Program Elements” for the Hanford Reach.

The Hanford Reach section of the 2002 Water Management Plan discusses proposed operations during the spring rearing period for juvenile fall chinook salmon. These proposed operations were developed by Grant County PUD (GCPUD) and are contrary to FWS management goals for juvenile fall chinook salmon in the Hanford Reach. A meeting of the Hanford Stranding Policy Committee was held on February 22, 2002. The primary goal of the meeting was to discuss and establish a protection plan for the spring, 2002 juvenile fall chinook rearing period. Protection guidelines were developed and proposed by WDFW, the Columbia River Inter-Tribal Fish Commission (CRITFC), the FWS, and GCPUD. The FWS and GCPUD recommendations are shown in Table 1.

Table 1. Recommendations developed by FWS, CRITFC, WDFW, and GCPUD for the protection of rearing juvenile fall chinook salmon in the Hanford Reach.

<u>Average Daily Flow (kcfs)</u>	<u>Recommended Flow Fluctuation Limit (kcfs)</u>	
	<u>FWS</u>	<u>GCPUD</u>
<80	10	20
80-110	10	30
110-140	10	40
140-170	20	60
>170	30	150 minimum with no fluctuation limit

Considering the economic and international significance of this stock of fall chinook, and FWS public and tribal treaty trust responsibilities, the goal of the position developed by the FWS was to minimize the impact of flow fluctuations on rearing juvenile fall chinook salmon.

The GCPUD position at the close of this policy meeting was to implement their original plan with no modification of proposed fluctuations, and only a minor modification to average daily flow levels that are associated with fluctuations. The FWS position at the close of this meeting was that the GCPUD plan would result in an unacceptable level of mortality to juvenile fall chinook as well as resident fish, and an unacceptable level of damage to the ecology and other resources of the Hanford Reach National Monument.

Hanford Reach

This information is based on [Grant County PUD's](#) "Proposed 2002 Hanford Reach Juvenile Fall Chinook Protection Program" Dated February 25, 2002. Details are summarized below.

2002 Program Elements

Starting Program Operating Constraints

1. Begin index seining (6 standard beach seine hauls at pre-determined locations) one week prior to the calculated start of emergence under the Vernita Bar Agreement. Index seining will be conducted daily to define the beginning of susceptibility.
2. Start operational constraints for 2002 program when a daily total of 50 or more subyearling chinook is sampled from the 6 index seining stations. During each index-seining sample, sub-yearling fork length will be reported. After program is initiated, decrease index seining to one time per week.

<u>Flow Range (Priest Rapids discharge)</u>		<u>Flow Fluctuation Limit</u>
<u>Lower</u>	<u>Upper</u>	
VBA Minimum	80 KCFS	20 KCFS
80 KCFS	110 KCFS	30 KCFS
110 KCFS	140 KCFS	40 KCFS
140 KCFS	170 KCFS	60 KCFS
170 KCFS		150 KCFS Minimum hourly discharge at Priest Rapids

Ending Program Operating Constraints

When 400 or more temperature units (°C) have accumulated following the end of emergence under the Vernita Bar Agreement, the operating constraints identified above will end.