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October 12, 2011

Mr. William C. Maslen
Manager, Fish and Wildlife Division
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208

Dear Mr. Maslen:

The purpose of this letter is to advise you of the Council's decision on a 2008 Federal Columbia River Power System (FCRPS) Biological Opinion (BiOp) project. This recommendation was made by the Council at its meeting on October 11, 2011.

In addition, a purpose of this letter is to inform the project sponsors and other interested parties of the status of Council actions. The following is a summary of the action taken by the Council at the meeting in October.

Tucannon River Programmatic Habitat, Project #2010-077-00

On August 2, 2010, Bonneville Power Administration (Bonneville) and the Snake River Salmon Recovery Board (SRSRB) submitted a tributary habitat project intended to assist in satisfying commitments under the 2008 Federal Columbia River Power System Biological Opinion (BiOp) for Independent Scientific Review Panel (ISRP) review. Under Reasonable and Prudent Alternative (RPA) Action 35 of the BiOp, the Action Agencies (AAs) committed to achieve habitat quality improvement targets in tributaries used by specific populations of Chinook and steelhead.

The purpose of this new Tucannon River habitat project is to implement on-the-ground habitat restoration actions to meet population specific targets required under the 2008 BiOp. The restoration actions will specifically benefit threatened Snake River spring/summer Chinook in the Tucannon Subbasin where the Action Agencies are committed to improve habitat quality by 17 percent by 2018¹. The actions will also benefit Snake River steelhead, bull trout, fall Chinook, freshwater mussels, and other species. Following are the restoration actions to be addressed by this project.

¹ Under RPA 35 Table 5 of the 2008 FCRPS BiOp.

1. Protect and maintain natural processes such as natural hydrologic and sediment routing throughout the system to allow natural migration and wood recruitment.
2. Connect disconnected habitats such as oxbows, wetlands, and former mainstem and side channels. Remove fish barriers.
3. Address roads, levees, and other human infrastructure impairing processes by removing or modifying culverts, levees, dredge spoils, diversion dams, and grade control structures.
4. Restore riparian processes by isolating and protecting healthy riparian areas, eradicating invasive species, and planting native communities.
5. Improve instream habitat conditions by installing large individual trees and large woody debris (LWD) structures in the mainstem channel.

Implementing entities include the Washington Department of Fish and Wildlife, Columbia Conservation District, Regional Fisheries Enhancement Group, the Confederated Tribes of the Umatilla Indian Reservation, Pomeroy Conservation District, and/or other qualified groups, tribes, or agencies that submit proposals that are approved by the SRSRB.

On November 15, 2010, the ISRP requested additional information from the proponents in order to determine whether the proposal met scientific criteria (ISRP document 2010-40).

On February 11, 2011 the Council received a response from Bonneville and on March 10, 2011, the Council received the ISRP's review (ISRP document 2011-8). The ISRP found that the proposal did not meet scientific review criteria, noting:

The response did not address many of the questions raised in the initial ISRP review. Some additional information was provided in the response via linkages to various planning documents. Nonetheless, the rationale for the proposed projects is still too vague to determine whether or not they are technically justified. The proponents must clarify the hypothesized linkages between proposed restoration actions, habitat improvements and VSP parameters in the Tucannon River and how progress will be monitored. The information provided in support of the establishment of a program to select future restoration projects remains vague.

On March 17, 2011 a teleconference was held between the ISRP the SRSRB. The purpose of the call, requested by the SRSRB, was to provide additional clarification from the ISRP and seek the panel's advice about the needed response.

On July 5, 2011 the Council received the final response from Bonneville and on August 8, 2011, the Council received the final ISRP review (ISRP document 2011-21). The ISRP found that the proposal meets scientific criteria (qualified). No public comments have been received on the ISRP reviews.

Though the ISRP found that the SRSRB had adequately addressed the issues raised in the review, the panel qualified its recommendation based on the two following items.

1. Criteria that will be used to prioritize future projects need to be developed.
2. A comprehensive restoration strategy and associated prioritization process should be developed before implementation of on-the-ground restoration activities.

The ISRP requested that these items be addressed in a report and be submitted for review prior to the spring of 2013. As part of the final review the ISRP asked that the report include a prioritization process and details of how it would be applied, a discussion of the status of habitat assessments, identification of reach-scale plans, a discussion of implementation of plans, and an evaluation of monitoring data regarding habitat conditions including coordination between program objectives and current understanding of problems with Tucannon salmon production.

Based on the ISRP review, the Council supports this project for implementation. This recommendation is conditioned that the SRSRB provide a report addressing the two ISRP issues prior to spring 2013². Implementation in later years will depend on further review by the ISRP and Council.

Sincerely,

Tony Grover
Director, Fish and Wildlife Division

cc: Christine Read, BPA
Peter Lofy, BPA
Paul Krueger, BPA
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Rosemary Mazaika, BPA
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Steve Martin, SRSRB

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² This date may align to the anticipated geographic (anadromous habitat) category review.