



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
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F/NWR5

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RE: Scope of Proposals Submitted for Blue Mountain and Mountain Snake Provinces, As
Related to NMFS' 2000 FCRPS Biological Opinion

Dear Ms. McNary and Messrs. Anderson, McKown, and Marker:

In a February 1, 2002, letter to the Northwest Power Planning Council (Council) regarding the National Marine Fisheries Service's (NMFS) review of Blue Mountain and Mountain Snake projects, I stated that, "to the extent that we identify any gaps in the range of proposed projects, they will be addressed in subsequent correspondence with the Bonneville Power Administration (BPA), the Council, and others." This letter reviews the scope of projects submitted for the Blue Mountain and Mountain Snake provinces and advises you of Reasonable and Prudent Alternative (RPA) Actions in the 2000 Federal Columbia River Power System Biological Opinion (2000 FCRPS Opinion) within those provinces that do not appear to be addressed by the proposals. We hope that this information will be useful for determining if funds need to be set aside for

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addressing these “gaps” through later provincial review solicitations or through some other funding process.

Background

The NMFS’ 2000 FCRPS Opinion defined an RPA that consists of 199 component actions (Actions). Actions 149-199 identify offsite mitigation activities in the areas of habitat, harvest, hatcheries, and research, monitoring and evaluation (RM&E). A number of these Actions are identified as the responsibility of BPA and must be completed by certain dates (e.g., 2003). Others have less defined schedules but must be planned for, implemented, or producing results at one or more of the check-in points (2003, 2005, and 2008) in order to achieve, and/or measure progress toward achieving, performance standards. Ecologically Significant Units (ESU) considered in the RPA that potentially spawn, rear, or migrate through mainstem reaches of the Snake Rivers within these provinces include Snake River (SR) spring/summer chinook salmon, SR fall chinook salmon, SR steelhead, and SR sockeye salmon.

The purpose of this letter is to compare the proposed and/or funded projects in the Blue Mountain and Mountain Snake provinces with RPA offsite mitigation Actions assigned to BPA and to point out any Actions that do not appear to be addressed by the projects. To address these “gaps,” BPA may need to initiate targeted solicitations for additional proposals or propose and justify a change in the RPA approach or schedule through the 2002-2003 annual implementation plan development and approval process. NMFS evaluated only those RPA offsite mitigation actions that appear relevant to the Blue Mountain and Mountain Snake provincial reviews (149-154, 169-170, 173-178, 180, 182-184, and 190).

Potential “Gaps” In Implementing RPA Offsite Mitigation Actions

The “gaps” identified for the suite of Blue Mountain and Mountain Snake proposals are similar to those identified in our November 9, 2001, letter to you regarding Columbia Plateau projects. We suggest that our staffs meet to discuss some of these consistent areas of concern to try to identify ways of ensuring that the Actions will be implemented on schedule. Most of these Actions also will be discussed in NMFS’ Findings Letter on the FY02 Implementation Plan.

Action 150

Action 150 calls upon BPA to fund protection of currently productive non-Federal habitat, especially if it is at risk of being degraded, in subbasins with listed salmon and steelhead. Seven proposals submitted in the Mountain Snake province included habitat acquisition as part of their objective (28008, 28036, 28037, 28038, 28039, 28040, 199405000). However, all of these projects are in the Salmon subbasin. There are several proposals in the Clearwater subbasin to secure easements, but they tend to focus on already degraded land with the intent to restore it, not to protect currently productive habitat. Two projects submitted in the Blue Mountain province address land acquisitions, one riparian (27011) and one primarily upslope parcel (27025). Another project proposes to acquire water rights (approximately 2 cfs) in an unspecified location (27020). Our conclusion is that the distribution of acquisitions may not be sufficient to

adequately conserve the ESU and that, although the RPA is designed to protect existing high quality habitat, many of the acquisitions are on already degraded land.

Action 153

Action 153 states that BPA, working with agricultural incentive programs, such as the Conservation Reserve Enhancement Program, shall negotiate and fund long-term Protection for 100 miles of riparian buffers per year.

Although a number of proposals included establishment of riparian easements and the erection of fences in riparian corridors as part of their action in the Mountain Snake and Blue Mountain Province, few discuss long-term or permanent protection.

Action 153 focuses on long-term riparian easements for two primary reasons: 1) restoration of riparian functions is a long-term process that depends on the age composition and structure of the riparian zone; and 2) long-term conservation of anadromous fish depends on the presence of ecological functions over the long term. Short-term easements contain no assurance that riparian benefit will be delivered and no guarantee that, once function is achieved, it will be permanent. Because few proposals state that the easements sought will be long-term and because it does not appear that these projects will total 100 miles, it is likely that a gap will exist for this RPA Action.

Action 169

Action 169 calls for the FCRPS Action Agencies to fund the development of NMFS-approved Hatchery and Genetic Management Plans (HGMPs), including plans for monitoring and revising them as necessary. HGMPs for all the Columbia Basin hatchery programs and facilities should be completed and approved by the 2003 check-in. There are no gaps identified for the Blue Mountain or Mountain Snake provinces assuming that the Lower Snake program (28026), or some variant of it, is funded.

Action 183

Action 183 requires monitoring of habitat actions designed to determine mechanistic and quantitative links between those actions and fish population responses (Tier 3 monitoring). For example, appropriate Tier 3 studies for Snake River steelhead irrigation screening projects would include juvenile survival rate estimates before and after screen installation across a variety of diversion rates, at two to three projects. This Action calls for two such experiments (monitoring projects) aimed at each major type of habitat project, and a minimum of three experiments conducted for each ESU. These studies must be initiated by 2003. We have listed a set of Tier 3 monitoring experiments distributed across the Columbia Basin and across project types that would implement Action 183 (Table 1).

To date, very few experiments that would satisfy the Tier 3 monitoring requirements have been proposed, indicating a potential "gap" for this Action. NMFS is currently working with BPA staff to identify those proposals in the Blue Mountain and Mountain Snake provinces that provide opportunity for these studies. We have informed the Council of the need to consider

reserving funds for this purpose as they determine their priorities for these provinces. NMFS suggests that the FCRPS Action Agencies take advantage of projects funded during the provincial review process for Tier 3 studies. This would involve soliciting researchers, in partnership with groups implementing funded projects, to submit proposals jointly for experimental monitoring of those actions.

Table 1. Distribution of habitat-oriented Tier 3 studies, by province, affected ESUs, and project type, that will satisfy experimental monitoring requirements outlined in Action 183. Provinces outside the Blue Mountain and Mountain Snake are provided as context for future provincial reviews. Underlined project types indicate those projects for which funding is currently being negotiated. **All** projects not underlined should be regarded as gaps. *Italicized entries* indicate those ESUs that are not the subject of the 2000 FCRPS Opinion's RPA. Snake River fall chinook and sockeye are not included in this table, due to the minimal impact that improvements to tributary habitat are anticipated to have on these ESUs

Province(s)	Project Type	ESUs affected
Lower Columbia Columbia Estuary	Restore riparian function/ stream complexity	Columbia R. Chum <i>LCR Chinook</i> <i>LCR Steelhead</i> <i>UWR Chinook</i> <i>UWR Steelhead</i>
	Blockage removal	Columbia R. Chum <i>LC Chinook</i> <i>LC Steelhead</i> <i>UW Chinook</i> <i>UW Steelhead</i>
	Sedimentation reduction	Columbia R. Chum <i>LC Chinook</i> <i>LC Steelhead</i>
	Water quality improvement	<i>UW Chinook</i> <i>UW Steelhead</i>
Columbia Plateau Columbia Gorge	Install/upgrade irrigation Screens	MCR Steelhead
	Restore riparian function	MCR Steelhead
	Blockage removal	MCR Steelhead
	Sedimentation reduction	MCR Steelhead
	Water quality improvement	MCR Steelhead
	<u>Nutrient enhancement</u>	MCR Steelhead

Province(s)	Project Type	ESUs affected
Columbia Cascade	Restoration of in-stream flows	UCR Spring Chinook UCR Steelhead
	Restore riparian function	UCR Spring Chinook UCR Steelhead
	Blockage removal	UCR Spring Chinook UCR Steelhead
	Install/upgrade irrigation screens	UCR Spring Chinook UCR Steelhead
Mountain Snake Blue Mountain	Install/upgrade irrigation screens	SR Spring/Summer Chinook SR Steelhead
	Sedimentation reduction	SR Spring/Summer Chinook SR Steelhead
	Restoration of in-stream flows	SR Spring/Summer Chinook SR Steelhead
	Blockage removal	SR Spring/Summer Chinook SR Steelhead
	Nutrient enhancement	SR Spring/Summer Chinook SR Steelhead

Other RPA Offsite Mitigation Actions

NMFS does not conclude that there are gaps for the following RPA Actions. In most cases, this is because there is insufficient information available to make this determination. For example, in some cases subbasin plans must first be prepared to identify the specific requirements for an RPA Action in a given subbasin. In other cases, the RPA Actions are presented to describe the ways that potential gaps are being addressed outside of the Blue Mountain and Mountain Snake review process.

Action 149

Action 149 calls upon the U.S. Bureau of Reclamation (BOR) to initiate programs in three priority subbasins (identified in the Basinwide Recovery Strategy) per year over 5 years to address all flow, passage, and screening problems in each subbasin over 10 years. Under the Council program, BPA addresses passage, screening, and flow problems, where they are not the responsibility of others. BPA expects to expand on these measures in coordination with the Council process to complement BOR activities described in the Action above.

Unfortunately, BOR still does not have the authority to address passage and screening issues

which limits the potential success and benefit of this Action to achieving the BiOps objectives.

Action 151

Action 151 states that BPA shall experiment with innovative ways to increase tributary flows (e.g., by establishing a water brokerage). BPA is to begin these experiments as soon as possible and submit a report evaluating their efficacy at the end of five years. The 2000 FCRPS Opinion does not intend that this action will be the sole strategy and mechanism to increase tributary flows.

In the Blue Mountain and Mountain Snake provinces none of the proposals specifically focused on innovative transactional strategies for securing tributary flow.

Action 151 commits BPA to experiment with innovative transactional strategies to increase tributary flows across the basin. The Action specifies that the objective is to develop innovative approaches, as distinct from projects, to increasing water flows through competitive markets. The Action additionally specifies that the efficacy of this Action will be evaluated by an independent entity at the end of five years. The success of this Action within the first five years will depend less on the total amount of water secured for instream flows than on the assessed potential of the innovative approach(es) to expand into an additional voluntary incentive-based tool with a significant capacity to address deficient instream flows. The efficacy of individual proposals to advance the ultimate objective of RPA Action 151 cannot be determined outside the context of an implementing framework. Gaps for this RPA Action cannot be evaluated until the overall strategy to implement and evaluate this Action is completed.

Action 151 also commits BPA to fund, in Year 1, development of a methodology acceptable to NMFS for ascertaining instream flows that meet ESA requirements. Although this commitment has not been satisfied, NMFS and BPA have begun preliminary discussions to address this issue.

Action 152

Action 152 states that the Agencies shall coordinate their efforts and support offsite habitat enhancement measures undertaken by other Federal agencies, states, Tribes, and local governments.

No proposals were applied to this Action in the Blue Mountain province. Three proposals specific to this Action were submitted under the Mountain Snake provincial review (199202603, 199608600, 199706000). Three other proposals could be construed as passive implementation of this Action by virtue of their collaborative nature, shared data, and coordination of efforts. Whether the lack of specific proposals addressing this Action represents a gap in implementation for this province probably depends on whether collaborative, concerted efforts to coordinate Actions and leverage resources are currently occurring in other venues.

Action 154

Action 154 calls for BPA to work with the Council to ensure development and updating of subbasin assessments and plans: match state and local funding for coordinated development of watershed assessments and plans: and help fund technical support for subbasin and watershed plan implementation from 2001 to 2006.

Seven proposals could be construed to apply toward Action 154 in the Blue Mountain province (27004, 27009, 27010, 27014, 27022, 199403900, 199702500). Ten proposals are consistent with the Action in the Mountain Snake (28005, 28016, 28018, 28029, 28043, 28044, 28048, 28050, 28059, 200003500). However, few of these proposals in either province describe how they contribute to the larger subbasin assessment and planning efforts, how they will be used to update watershed assessments and plans, or how they will be integrated within the Council subbasin plans.

Whether the lack of integrated proposals addressing this Action represents a gap in implementation for this province probably depends on whether collaborative, concerted efforts to coordinate Actions, synthesize results, and application within a larger assessment and planning framework can be accomplished after these projects have been completed.

Action 180

Action 180 calls for a basinwide monitoring program addressing environmental and population status. A draft program was to be developed in 2001, implementation is to begin no later than spring 2002, and the monitoring program is to be fully implemented by 2003. NMFS assumes that the coordinated status monitoring program described by Action 180 will be implemented primarily through the Mainstem/Systemwide provincial review. NMFS will not address whether a gap exists until proposals for that province have been submitted. The Action Agencies and NMFS are working collaboratively on a regional RME plan that addresses RPAs 180 and 183. The primary goal will be to implement these RPAs through the provincial review process; however, implementing these RPAs might require targeted solicitations once the monitoring plan has been developed and a complete gaps analysis of ongoing and proposed projects has been completed.

Action 182

This Action calls for studies aimed at determining the relative effectiveness of wild and hatchery spawners (three per ESU, established within three years). One proposal in the Columbia Plateau Province would develop a method for marking progeny of hatchery spawners that could be used for such a study. However, there were no proposals to conduct studies using this or other methods for the Columbia Gorge, Columbia Plateau, Blue Mountain or Mountain Snake Provinces. Given the three-year cycle of the provincial review process, needed studies for a number of ESUs will not be initiated within the three-year time frame unless an alternative approach is developed. NMFS believes that progress is being made on this alternative approach, so a gap is not identified for this RPA Action at present. Discussions between the FCRPS Action Agencies and NMFS are currently underway to develop methods to implement this Action for Mid-Columbia River steelhead and for other

listed ESUs. A "Request for Qualifications" specifically addressing this RPA has been developed and will be attached to the Mainstem/System Wide province solicitation letter to be released in April.

Action 184

Action 184 requires studies to determine whether hatchery reforms are reducing the risk of extinction for wild fish and whether conservation hatcheries can contribute to recovery. Several projects submitted for the Columbia Plateau province address this need. These are important studies, which contribute to satisfying the requirements of Action 184. so a gap is not identified for this Action at this time. However, some additional monitoring of hatchery-wild ecological and genetic interactions are likely to be necessary. particularly in populations with naturally-spawning hatchery fish. and in other provinces.

Action 190

This Action calls for continuing study of survival and early life history traits of SR fall chinook juveniles. One proposal in the Columbia Plateau province addresses passage survival and timing for this ESU. Although this work will contribute to meeting the requirements of Action 190. additional studies addressing hydrosystem passage survival rates and other early life history characteristics also will be necessary. None were proposed for the Blue Mountain or Mountain Snake provinces. NMFS expects that these studies will likely be included in the Mainstem/Systemwide provincial review, so a gap is not identified at this time.

We share, I believe, a common objective of ensuring that the Action Agencies are on target for the three-year check-in and that we have initiated those actions necessary to lead to recovery of the basin's listed salmon and steelhead. We appreciate that the information provided herein regarding timely implementation of the 2000 FCRPS Biological Opinion is complex and subject to some interpretation. In that regard, we would be pleased to meet with you to discuss or elaborate on our assessment of activities in the 2000 FCRPS Opinion that we believe need further attention. Please feel free to contact John Palensky with any questions you might have regarding technical aspects of this assessment.

Sincerely,



Brian J. Brown
Assistant Regional Administrator
Hydro Program

Enclosure

cc: Fred Olney, USFWS
Jann Eckman, CBFWA

Enclosure 1. Project titles corresponding to project numbers cited in letter. For more details. See the Columbia Basin Fish and Wildlife Authority website <http://www.cbfgwa.org>.

Project Number	Project Title
27004	Grande Ronde and Imnaha Stream Channel Complexity and Fish Passage Barrier Inventory. Prioritization and Remediation
27009	SSHIAP - Blue Mountain Province
27010	Snake River Hell's Canyon Tributary Enhancements
27011	Lookingglass Creek land purchase for watershed protection (spawning and rearing habitat continuity and water quality at Lookingglass Hatchery).
27014	Protect and Restore the Asotin Creek Watershed
27020	Grande Ronde Subbasin Water Right Acquisition Program
27022	Precious Lands Wildlife Habitat Expansion
27025	Acquire South Fork Asotin Creek Property
28005	Assessment of spring/summer chinook salmon habitat within the Salmon River Subbasin.
28008	Riparian Conservation Easement Purchase of Scarrow Property on Lake Creek, a Tributary to the Secesh River, Idaho
28016	Restoration of the Yankee Fork Salmon River
28018	Lower Salmon River Tributary Protection and Enhancement
28026	Develop HGMP's for LSRCP Programs to address artificial production reforms identified in the FCRPS Biological Opinion and other regional processes.
28029	Restore Lawyer Creek Habitat Targeting Steelhead and Chinook Salmon
28036	Holistic Restoration of Critical Habitat on Non-federal Lands in the Pahsimeroi Watershed, Idaho
28037	Holistic Restoration of Critical Habitat on Non-federal Lands in the Lemhi Watershed, Idaho
28038	Holistic Restoration of Critical Habitat on Non-federal Lands in the East Fork Salmon Watershed, Idaho
28039	Holistic Restoration of Critical Habitat on Non-federal Lands in the Middle Salmon Panther Watershed, Idaho
28040	Holistic Restoration of Critical Habitat on Non-federal Lands in the Upper Salmon Watershed, Idaho
28043	Crooked River Ecosystem Assessment at the Watershed Scale
28044	Protect and Restore Deer Creek Watershed
28048	Protect and Restore Crooked Fork Creek to Colt Killed Analysis Area
28050	Protect and Restore Little Salmon River Salmon
28059	Restoring anadromous fish habitat in the Lapwai Creek watershed.
199202603	Upper Salmon Basin Watershed Project Administration Implementation Support
199401500	Idaho Fish Screen Improvement
199403900	Watershed Restoration Planner
199405000	Salmon River Habitat Enhancement M & E
199608600	Clearwater Focus Program
199702500	Implement The Wallowa County/Nez Perce Tribe Salmon Habitat Recovery Plan
199706000	Clearwater Subbasin Focus Watershed Program - NPT
200003500	Rehabilitate Newsome Creek Watershed - South Fork Clearwater River