



FISH PASSAGE CENTER

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MEMORANDUM

TO: FPAC

FROM: Michele DeHart

DATE: January 23, 2008

RE: Draft 2008 Fish Operation Plan

At your request we have reviewed the Pre-decisional Draft of the 2008 Fish Operations Plan that was distributed by the Corps of Engineers. We understand that this document was prepared in response to the willingness expressed by the BIOP Remand plaintiffs to work with the parties to reach an agreement for 2008 operations that would essentially continue (subject to discussion of limited changes necessary to accommodate new structures and perform essential research) the court-ordered operations from 2007. The Fish Operations Plan that was distributed by the COE for review does have some changes from 2007 that could potentially reduce spill and, in addition, we would like to point out where the continuation of 2007 operations in 2008 may not be in the best interest of fish protection. Our specific comments are as follows:

- Page 4 (1st bullet)– “Adjustments will be made to manage spill operation consistent with the states’ 2007 TDG saturation limits of 120% tailrace and 115% forebay for fish passage.”
 - There has been considerable concern expressed by the state, tribal and federal fishery agencies over the past several years regarding the use of the Camas/Washougal TDG monitoring station to represent the next downstream forebay below Bonneville Dam. In response to the expressed concerns the State of Oregon issued a 2008-2009 waiver for TDG management for fish passage that did not include the Camas/Washougal station as a point of compliance. Both Oregon and Washington waivers do NOT include Camas /Washougal as a site of compliance.

- Operating spill under the 2007 saturation limits (i.e., with CAMWAS as a point of compliance) will likely limit spill at Bonneville. It does not make sense to operate to a point of compliance that does not exist.
- In general, the spring spill agreed to in 2007 of 100 Kcfs daytime spill was based on concerns for adult passage, however, the 100 Kcfs nighttime spill does not have a biological basis. There is no reason to limit the spill to less than gas cap spill during nighttime hours and gas cap spill should be determined based on tailrace readings only.
- The draft document (page 8) refers to the inability to reach target spill levels due to operation during Load Swing Hours. Efforts should be made to compensate for this effect by increasing adjacent hours spill so that daily targets are met.
- Page 10 (Little Goose) – LGS will be spilling 30%/30% all season but will be testing bulk and uniform spill patterns for juvenile and adult passage.
 - In the past, there have been concerns with adult passage at spill >30% during the summer period at low flows. However, this limitation is suspect since it is unclear as to whether adult delays at the time were due to spill levels, spill pattern, and/or unit outages.
 - By limiting spill to 30%, the proposed study ignores uncertainty in the influence of spill levels. Higher spill levels should be tested under the bulk and uniform patterns (with all units operable) to investigate their effect on adult and juvenile passage.
- Page 13 (4th bullet) – “Spill will be reduced or stopped (at LMN) as needed to allow safe operation for fish transportation barges near collection facilities downstream of the project.”
 - LMN will have an RSW in operation in 2008. There is concern that the RSW will extend the time frame for reduced spill levels for transportation barges. Prior to the RSW, these reduced spill levels would typically only last 1-3 hours. The salmon managers would like to see that these are not changed significantly with the RSW in operation.
- Page 14 – Under the 2008 FOP, spring and summer spill at IHR will alternate between 30%/30% and 45 Kcfs/Gas Cap, with the RSW in operation
 - Salmon managers have agreed to these spill operations at IHR over the past several years for testing purposes. **However, there is no test planned at IHR in 2008.**
 - It does not make sense to repeat the test conditions when they have not been shown to benefit fish passage. With no testing planned, spill at IHR should not be limited to 30%/30% and should be 45 Kcfs/Gas Cap throughout the entire spill season.
- Page 18 (1st bullet) – “Spill will be modified or reduced as needed to allow safe operation of fish transportation barges near collection facilities downstream of the project.” “The TSWs may be closed for up to 4-5 hours for each barge operation.”

- Language throughout this bullet is unclear as to whether modified or reduced spill will only be provided for transportation barges or all barges.
 - Would additional spill be provided through other bays to compensate for TSW outages?
 - 4-5 hours of reduced spill for transportation barges is longer than typically provided at other projects.
- Page 19 (2nd bullet) – Testing of 30%/30% and ~40%/40% at JDA in spring and summer.
 - The salmon managers have been requesting testing of >40% spill at JDA but language in FOP indicates that 40% is maximum and that possibly less than 40% will be provided.
- Page 22 – Summer spill at BON scheduled to be 85 Kcfs/Gas Cap (June 20--July 20) and 75 Kcfs/Gas Cap (~Jul 21 – August 31). This represents a compromise that was reached in 2007 because the Action Agencies would not agree to increase spill throughout the season, even though 83-85 Kcfs was recommended by the FPOM.
 - It remains unclear why spill is reduced to 75 Kcfs from July 21 through August if 85 Kcfs is preferred for fish passage.
- Page 25 (Planned Research) – Research projects have the potential to significantly affect the provisions listed in the drfat document. Three research projects involving transportation at LGR are planned to begin potentially before initiation of full transportation.
 - Full transportation at LGR is not scheduled to begin until April 20-May 1 (actual date to be determined by TMT). Transportation did not begin until May 1 in 2007 and it is likely that the salmon managers will not initiate transportation until May 1 in 2008, unless conditions suggest otherwise.
 - One of transportation studies involved limited transportation (1 barge per week) as early as April 10, which is before the earliest possible date for initiation of full transportation.
 - Other two studies involve transporting fish beginning April 20-21. This could be earlier than the initiation of full transportation, if transportation at LGR is not initiated until May 1.