



FISH PASSAGE CENTER

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MEMORANDUM

TO: Tom Lorz (CRITFC), Chair of FPOM Task Group on BON Unit Operating Range

FROM: Michele DeHart

DATE: May 7, 2013

RE: BON Operations Task Group - Comments on Proposed Fish Passage Plan Change Form and Supporting Memorandum

The Fish Passage Center (FPC) staff has reviewed the proposed Fish Passage Plan (FPP) change form for the operation of the first and second powerhouses at Bonneville Dam (BON). In addition, FPC staff also reviewed the supporting memorandum that accompanied the change form. Below are our comments on the proposed change form and supporting memorandum.

- The supporting document states that the comparative analysis focused primarily on juvenile spring/summer Chinook and spring Chinook adults. One reason for this focus was the assumption that spring Chinook were the species most likely to be impacted by this operation. While this is likely true of adults passing during this time, it is not necessarily true of juveniles passing during this time.
 - In response to a request, the FPC provided a memo to the BON Ops Task Group on December 17, 2012 that demonstrated that operating BON PH2 above the mid-range had a significant effect on sample mortalities for not only yearling Chinook but also subyearling Chinook and sockeye.
 - This memo was not mentioned in the supporting document.
 - Although the supporting document provides a brief statement that sockeye passage will be addressed on a case by case basis it does not provide any detail of how sockeye passage data will be used for this consideration. Furthermore, sockeye passage data are not addressed in the proposed change form.

- The “adult trigger” does not include other species of juvenile salmonids that are impacted by this operation (i.e., sockeye and subyearling Chinook) and, thus, the impact to juveniles is underestimated.
 - The Fish Passage Advisory Committee submitted two System Operational Requests (SORs) in response to high mortalities and high descaling of Spring Creek NFH subyearling Chinook and sockeye in 2012. These events are what led to the formation of this FPOM task group.
- Step 5 of the proposed change form defaults to the operation of PH2 above the mid-range after June 21, when flows warrant. Although flows of this magnitude are rare at this time of year, this seems to ignore the impacts of operating BON PH-2 above the mid-range on subyearling Chinook, which are typically passing at this time.
- There is no information in the proposed change form for what the operation will be if/when there are fluctuations in meeting the “adult trigger”. The change form does not address the operation when flows are high enough to warrant Step 4 of Section 5.3.1 but there are fluctuations in the juvenile collection counts and adult counts (i.e., “adult trigger” is met for a short period followed by a short period where “adult trigger” is not met).