



Grant County
PUBLIC UTILITY DISTRICT
Innovation & Excellence...Yesterday, Today and Tomorrow

Exhibit D.1
Attachment 1
September 2003

RECEIVED

AUG 8 2003

PFMC

August 4, 2003

Dear Priest Rapids Project Relicensing Stakeholder:

Grant County Public Utility District has received your comments on our Draft Application to License the Priest Rapids Project. We will give them all careful consideration and they will be included in the record of public consultation provided to the Federal Energy Regulatory Commission (FERC) when we file our Final License Application in October of this year.

We appreciate the fact that you took the time to prepare comments, and we hope that you will stay involved and continue to make your voice heard as the process moves forward. Once the Final Application is accepted by FERC, another round of comment and environmental review will begin.

To stay involved and informed, please visit the Relicensing section of our website or contact the Relicensing Hotline at 1-800-894-6960.

Sincerely,

Vera Claussen
President
Grant County PUD Board of Commissioners

Public Utility District No. 2 of Grant County, Washington

CURRENT HABITAT ISSUES

Situation: The Habitat Committee (HC) will meet Monday, September 8, 2003 to develop recommendations on the following agenda items:

- B.3 Council Input into NOAA Fisheries Constituent Survey
- E.1 Update on Marine Reserves Issues
- E.2 Marine Reserves in the Federal Waters Portion of the Channel Islands National Marine Sanctuary
- C.9 Groundfish Bycatch Program Environmental Impact Statement

The HC will receive a presentation by Dr. Ian Fleming of Oregon State University discussing the effects of salmon net pens on Council-managed species. The HC will also hear updates on Klamath River flows and habitat mapping efforts.

In addition, the Council received a form-letter response from the Grant County Public Utility District regarding the Council's July 7 comments on the Priest Rapids license application. The letter is attached (Exhibit D.1, Attachment 1).

The HC's complete agenda is provided in Ancillary D.

Council Action:

1. Consider comments and recommendations developed by the HC at the September meeting.

Reference Materials:

Exhibit D.1, Attachment 1. Letter from Grant County Public Utility District acknowledging comments from the Council.

Agenda Order:

- a. Agendum Overview
- b. Report of the HC
- c. Reports and Comments of Advisory Bodies
- d. Public Comment
- e. **Council Action:** Consider HC Recommendations

Jennifer Gilden
Stuart Ellis

PFMC
08/25/03

DEFINITIONS: MARINE RESERVES AND MARINE PROTECTED AREAS

The following are definitions of types of marine reserves and marine protected areas. These definitions are from: Marine Protected Areas: Tools for Sustaining Ocean Ecosystem. This 2001 publication of the National Academy Press was compiled by the Committee on the Evaluation, Design, and Monitoring of Marine Reserves and Protected Areas in the United States, Ocean Studies Board, National Research Council. "Ecological reserve" is the term used for areas providing the most complete protection and "marine protected area" is a broad term that includes ecological reserves as well as partially protected areas. Fishery reserves and marine reserves land between these extremes, specifically: ecological reserves are a subset of fishery reserves; fishery reserves are a subset of marine reserves; and marine reserves are a subset of marine protected areas.

ecological reserve: Zoning that protects all living marine resources through prohibitions on fishing and on the removal or disturbance of any living or nonliving marine resource. Access and recreational activities may be restricted to prevent damage to the resources. These reserves may also be referred to as full protected areas.

fishery reserve: Zoning that precludes fishing activity on some or all species to protect critical habitat, rebuild stocks (long term, but not necessarily permanent closure), provide insurance against overfishing, or enhance fishery yield.

marine reserve: A zone in which some or all of the biological resources are protected from removal or disturbance; encompasses both fishery and ecological reserves.

marine protected area (MPA): Geographic area with discrete boundaries that has been designated to enhance the conservation of marine resources. This includes MPA-wide restrictions on some activities such as oil and gas mining and the use of zones such as fishery and ecological reserves to provide higher levels of protection.

REPORT OF THE HABITAT COMMITTEE

The Habitat Committee (HC) met on Monday, June 16 and discussed the following topics. Comments on the Groundfish Bycatch Program Environmental Impact Statement (EIS) will be made during that agenda item.

Salmon Aquaculture

The HC heard a presentation on Atlantic salmon net pen aquaculture by Dr. Ian Fleming of Oregon State University. The HC has concerns about net pen aquaculture and discussed how to address this issue in the future. This is a very important issue with a number of habitat, ecosystem and fishery-related implications, including potential effects on wild salmon, steelhead, and groundfish. For example, there is documentation of Atlantic salmon spawning in coastal streams in British Columbia and Alaska, leading to competition between native salmon and these exotic fish. There are also water quality and disease transmission issues associated with net pen aquaculture, and there is potential for other species besides salmon, such as sablefish and halibut, to be farmed offshore.

The HC proposes drafting a resolution that clarifies the Council's position on salmon net pens (as they relate to habitat) for presentation to the Council in November. At the same time, we realize this issue has implications that go beyond habitat effects. For example, salmon net pens have an important economic impact on Council-managed salmon fisheries.

We recommend the Council invite Dr. Fleming and/or other experts to give a similar presentation to the Council and its advisory bodies, and consider a draft resolution in November.

Klamath/Trinity Flows

The HC received an update on Klamath River issues from Mr. Mike Rode. The U.S. Bureau of Reclamation (USBR) is presently operating the Klamath Project under a "below average" water year type that is resulting in a flow release of 1,168 cubic feet per second (cfs) at Iron Gate Dam during the month of September. This flow is approximately 60% greater than occurred last year at this time, just prior to the onset of the fish kill. Additionally, the USBR has implemented an augmented flow release schedule on the Trinity River to increase flows in the lower Klamath River and minimize the risk of incurring another major fish kill. Trinity River flows at Lewiston Dam were increased from 450 cfs on August 24 to 1,650 cfs on August 26, and are being ramped back down to the base flow of 450 cfs by September 17. Flows at the mouth of the Klamath River at this time are approximately 3,500 cfs, compared to 2,000 cfs last year. The HC is concerned that the use of such a large amount of Trinity River water to solve a mainstem Klamath River flow problem is an artificial short-term solution for a complicated long-term problem and neglects anadromous fish needs in the 140-mile portion of the Klamath above its confluence with the Trinity River.

Conservation Implementation Program (CIP)

The CIP is being proposed by the USBR to recover endangered shortnose and Lost River Suckers and coho salmon while allowing continued operation of existing facilities and future development of water resources for human use in the Klamath Basin. The HC is concerned there is not enough water in the Upper Klamath Basin to provide for all fish, wildlife, and agricultural needs especially during below average water years; the water needed cannot be developed. Therefore, the HC believes it is unrealistic for the CIP to propose that listed species can be recovered while even more water is developed for future agricultural and other human uses. The HC is also concerned the CIP only focuses on three listed species when the health of the entire Klamath River ecosystem is in jeopardy. For instance, the CIP will not address the EFH of chinook salmon, a Council-managed species that suffered a devastating fish kill in September 2002. To be successful, the HC believes that the CIP needs to be a multi-species, ecosystem-based program.

Other Issues

The HC also discussed marine reserve issues, and supports the MPA Demonstration Project as a way to improve collaboration between the Council and other federal agencies. We also heard an update on West Coast habitat mapping that will be used in the EFH EIS and other efforts.

Finally, the HC received public comment from Oceana on deep water corals and sponges as living substrate. We expect a more in-depth presentation on this topic at some point in the future.

PFMC
09/09/03