

## HABITAT COMMITTEE REPORT ON CURRENT HABITAT ISSUES

### Salmon Rebuilding Plans

Following requests from the Salmon Technical Team (STT) for Habitat Committee (HC) review of habitat conditions potentially affecting salmon rebuilding plans, the HC discussed ways to review habitat-related limiting factors for Klamath River Fall Chinook and Sacramento River Fall Chinook. The HC proposes to review habitat-related issues identified in each rebuilding plan, to identify and speak with experts on both systems, and to identify where Council engagement would be most beneficial. For example, the Council could comment on Klamath dam removal operations and water operations. **The HC requests specific direction from the Council regarding the path forward on rebuilding plans.**

### Columbia River Draft Environmental Impact Statement (DEIS)

The HC received presentations on the DEIS for Columbia River System Operations (CRSO) from Ms. Rebecca Weiss (U.S Army Corps of Engineers [ACOE]), Mr. Jason Sweet (Bonneville Power Administration [BPA]), and Dr. Steven Haeseker (U.S. Fish and Wildlife Service [USFWS]). This DEIS had not been updated since 1995. The new DEIS was released Friday, February 28, and the deadline for comments is April 13. Therefore, the HC has had limited time to review the document.

The DEIS compares five action alternatives, including the preferred alternative (PA), plus the no action alternative. The action alternatives range from a modest increase in spill to breaching the four lower Snake River dams.

The HC believes the PA runs a high risk of failing to recover salmon listed under the Endangered Species Act. In fact, under one of the two models used to analyze the Alternatives in the DEIS, the PA is predicted to have negative impacts on salmon survival. The three action agencies (ACOE, BPA, and BOR) view this dichotomy between the two models and the associated risk as the appropriate course of action. They justify this in part because as the PA is implemented, it will provide valuable insights into the effects of the “flex spill agreement” (allowing varying spills during day and night) that is at the core of the PA. The HC believes that the risk of failure reflects that “flex spill” is very close to status quo, and will not promote recovery of ESA-listed salmon stocks, and that embarking on a multi-year experiment is not appropriate given the extremely tenuous status of the populations.

In addition to these issues, the HC is concerned with a number of other aspects of the PA:

- The PA’s predicted improvement to salmon survival may be overly optimistic. One of the two analysis models indicate that 36 percent to 39 percent of the time the preferred alternative would result in smolt-to-adult (SAR) rates below one percent. One percent is the threshold for overall population decline. Recall that the NPCC has identified a SAR of 2-6 percent with an average of 4 percent would lead to recovery of listed salmon populations in the Columbia Basin. Furthermore, this PA does not factor in the adverse effects of climate change in the Columbia Basin that could further lead to decline.

- The PA does not include fish passage benefits supporting population recovery. The Comparative Survival Study (CSS) analysis, one of two approaches to modeling salmon survival rates for the different alternatives, indicated that the alternative to breach the four Lower Snake River dams and the alternative to increase spill to a dissolved gas cap of 125 percent were the only two alternatives that had potential to improve survival of listed salmon populations in the Snake River. This is based on the recommended recovery goals by the Northwest Power and Conservation Council (NPCC).
- The PA includes a Flex Spill Agreement calling for decreased spill at night and higher spills during the day. This would result in overall spill rates below the total dissolved gas cap (125 percent) agreed to by the states. The CSS analysis, which is based on monitoring of PIT-tagged fish, indicates that during the night there is a higher probability of fish passing through powerhouses rather than being spilled through dams. This could have a significant impact on fish survival.
- The high capacity turbines suggested in the PA are not proven to improve fish survival and should not be relied on to generate benefits for fish.
- The PA allows drafting down reservoir pools below flood control levels before spring. This contributes to the risk that during years with low snowmelt there will not be enough remaining water to allow additional spill to support juvenile outmigration.

**The deadline for comments on the draft EIS is April 13. The HC is prepared to draft a letter for the April Briefing Book if the Council wishes to provide comment on the draft EIS, including its alternatives or preferred alternative.**

### **Status of Final EIS for Jordan Cove LNG Project and Pipeline Project**

The Federal Energy Regulatory Commission (FERC) published the final environmental impact statement for the Jordan Cove Project in November. In February, the Jordan Cove Project was denied the three regulatory authorizations required by the State of Oregon for the project to proceed (i.e., Clean Water Act Section 401 water quality certification, removal-fill permit, and concurrence with the state's Coastal Zone Management Program (CZMP) policies). Project proponents have 30 days to appeal the Department of Land Conservation and Development's (DLCD) objection. However, the Secretary of Commerce could override the objection if the action is deemed in the best interest of the public. In response to the CZMP objection, FERC commissioners voted to delay its decision to issue a license to Jordan Cove proponents, pending further review of DLCD's objection.

### **Ecosystem-Based Fisheries Management Meeting**

NOAA Fisheries is convening the first National Ecosystem-Based Fisheries Management meeting in Seattle next week (3/10-3/12/2020). The HC's John Stadler will be attending the first two days of the meeting.

PFMC  
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