



Pacific Fishery Management Council

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Pete Hassemer, Chair | Merrick J. Burden, Executive Director

March 2, 2026

Ms. Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: Federal Energy Regulatory Commission (FERC) Hells Canyon Draft Supplemental Environmental Impact Statement for Hydropower License

Dear Ms. Reese,

The Pacific Fishery Management Council (Council) has reviewed both Volume 1 and Volume 2 of the *Hells Canyon Draft Supplemental Environmental Impact Statement for Hydropower License* (hereinafter, the “DSEIS”) prepared by the Federal Energy Regulatory Commission (FERC) and appreciates the opportunity to comment. The purpose of the DSEIS is to provide coverage for federal licensing of the Hells Canyon hydropower complex.

Council Authority

The Council is one of eight fishery management councils established by the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The MSA requires fishery management councils to describe, identify, conserve and enhance essential fish habitat (EFH) for species managed under their federal fishery management plans (FMPs). The MSA requires the Council to comment on actions that, in the view of the Council, are likely to substantially affect the habitat, including EFH, of an anadromous fishery resource under its authority (Section 305(b)(3)(B)). EFH includes those substrates and waters and their associated physical, chemical, and biological properties necessary for spawning, breeding, feeding and growth to maturity in support of sustainable fisheries. The Council’s Pacific Coast Salmon FMP identifies EFH for Chinook salmon and coho salmon to include the Columbia River downstream of Chief Joseph Dam and the Snake River downstream of Hells Canyon Dam. Therefore, this DSEIS will affect a critical component of EFH, specifically for Chinook salmon in the Snake River. In accordance with the Council’s authorities, the Council has reviewed the DSEIS in the context of the MSA mandate for sustainably managed fisheries and conservation of salmon EFH.

Background

The DSEIS states that the National Marine Fisheries Service (NMFS) estimates that 52 percent of the historical fall Chinook salmon spawning in the Columbia Basin occurred in the Snake River and that 58 percent of the habitat used for that spawning was located upstream of Hells Canyon

Dam. Currently, the distribution of anadromous fish within the Snake River Basin is limited to the mainstem Snake River and portions of its tributaries downstream of Hells Canyon Dam. The 107-mile segment from Hells Canyon Dam to the head of Lower Granite Reservoir contains most of the fall Chinook spawning and rearing habitat that is still accessible. As such, this segment of the Snake River is an important component of fall Chinook salmon EFH and the impacts of hydropower operations on this section of the Snake River are important to the Council.

Comments and Recommendations

Based on the Council's review of the DSEIS, we offer the following observations:

- The Council supports stable flow conditions below Hells Canyon Dam during the fall Chinook spawning window and supports the stable flow program (8,500 cfs to 13,500 cfs second Monday in October through second Friday in December). This program appears to be adequately protective to fulfill this condition. However, active monitoring of the start and end of the spawning period should be maintained, and the start and end dates adjusted through the course of the license as needed to maintain protection. Given the length of the proposed license and potential effects of changing environmental conditions, the timing of the spawning period has a high potential to change from the period described in the 2025 Idaho Power Company Biological Assessment.
- The Council supports the proposed minimum flows to avoid redd dewatering during the fall Chinook incubation and rearing period (typically near the middle to end of May).
- The Council supports Idaho Power Company's proposed annual monitoring including: (1) conducting annual redd surveys to estimate the number of fall Chinook salmon redds constructed in the Snake River between Hells Canyon Dam and Lower Granite Reservoir and determining the minimum incubation flow (released from Hells Canyon Dam) needed to protect the shallowest redd; and (2) conducting annual water temperature monitoring downstream of Hells Canyon Dam and estimating when fall Chinook salmon fry emerge from the gravel to determine how long the minimum incubation flow should be maintained.
- The Council supports ongoing hatchery mitigation and the proposed increased production at Rapid River Hatchery as a necessary measure to help improve Columbia River salmon stocks in support of Council fisheries.
- The Council suggests moving the end date of flow augmentation from Brownlee Reservoir to correspond with the reduction in spill at the federal dams in the Lower Snake River, should that reduction occur prior to the scheduled end of flow augmentation. In 2025, spill at the lower Snake River dams was limited to spillway weirs only after August 1st. Additional water arriving at Lower Granite Dam (i.e., flow augmentation) after the commencement of those limited spill levels will increase powerhouse passage rates of wild subyearling fall Chinook salmon relative to baseflow in all but the lowest water supply years. If the date of restricted spill at lower Snake River dams changes back to later in August, as it was from 2006-2023, then the flow augmentation obligation of Brownlee Reservoir should remain through August 7th or as determined through the process described in Environmental Measure 8S.

- The Council supports the construction of spillway deflectors at all three Hells Canyon Complex dams and suggests that Idaho Power Company design and construct the deflectors as quickly as feasible, ideally with all construction at all three dams completed within six years. Spillway deflectors at all three dams will improve water management at the Hells Canyon Complex with benefits for Chinook salmon. Spillway deflectors will allow Brownlee Reservoir to be operated closer to flood risk management requirements because total dam outflow can increase without exceeding total dissolved gas criteria in Oxbow Reservoir, Hells Canyon Reservoir, and the Snake River downstream of Hells Canyon Dam. The ability to pass additional inflow during spring will benefit migrating Chinook salmon.
- Quagga mussel infestations pose serious ecological threats to aquatic resources and substantial damage to infrastructure and vessels. Since 2023, quagga mussels have been detected in upper reaches of the Snake River. Idaho's timely applications of molluscicide treatments have made progress in reducing the size of the infested area; however, with the unfortunate consequence of high fish mortality. Although current detections are upriver from the Hells Canyon Complex, the risk of downstream movement through larval dispersal remains. Downstream infestations could threaten migrating salmon by causing food web disruptions, physical injury, habitat alterations, and reduced survival rates. Furthermore, the expansion of quagga mussels in the Snake Basin could greatly undermine decades of salmon and steelhead recovery efforts both within the Project Boundary and the Columbia Basin. The DSEIS addresses quagga mussels only in the context of improving information dissemination to recreational users (Section 3.10.2.5). The Council appreciates Idaho Powers' engagement in state quagga mussel rapid response exercises, the Western Regional Panel on Aquatic Invasive Species, and the Columbia River AIS Team. However, in order to stay ahead of this region-wide environmental and economic threat, the Council recommends Idaho Power convene a technical advisory committee to continue developing a project-specific comprehensive invasive mussel plan, consistent with the Columbia River Basin State Rapid Response Plans and Guidelines, to address prevention, monitoring, and public outreach.

In closing, we commend FERC staff for their thorough work on the DSEIS and appreciate the opportunity to submit comments. The Council supports the measures outlined in the DSEIS that are designed to improve and protect freshwater habitat and promote salmon survival, which are critical to sustaining regional fisheries. Additionally, the Council feels there is some room for improved language within the DSEIS related to flow augmentation management, spillway deflector construction implementation, and quagga mussel preparedness. The Council appreciates your consideration in these matters.

Sincerely,



Pete Hassemer
Council Chair

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Cc: Council Members