

# State, Federal and Tribal Fishery Agencies Joint Technical Staff

*Columbia River Inter-Tribal Fish Commission*  
*Idaho Department of Fish and Game*  
*Nez Perce Tribe*  
*Oregon Department of Fish and Wildlife*  
*Shoshone-Bannock Tribes*  
*US Fish and Wildlife Service*  
*Washington Department of Fish and Wildlife*

Rebecca Kalamasz  
US Army Corps of Engineers  
Walla Walla District  
201 N. 3rd St.  
Walla Walla, WA 99362-1876

Dear Ms. Kalamasz:

At the request of the TMT, FPAC has reviewed the proposed "Ice Harbor Special Spill Injury Test Summary" for 2005 and has the following comments. We have several concerns with the basis for and the operational impacts of the proposed study, especially given the low flow conditions expected for 2005 and the commensurate detrimental effects on fish survival.

First, we find little technical basis for conducting the proposed study. Radio telemetry studies conducted at Ice Harbor in 2004 showed high survival for spring and summer migrants passing through the existing spillway, which was not surprising given that the spillway passage routes have consistently demonstrated the highest survival rates among all passage routes. The draft report by Normandeau and Skalski summarizing Ice Harbor balloon tag studies conducted in 2003 and 2004 showed absolutely no effect of tailrace elevations on either survival or the proportion of injured fish. However, the results of the report strongly suggest that velocities at the end of the hose and spill volume are the primary factors affecting survival and injury rates, not tailrace or forebay elevation. That is, the location of the hose release and/or the spillway volume determine the survival and injury rates, a concern on the reliability of balloon tag studies that we have repeatedly expressed at SRWG meetings. The effects of hose release location on survival have also been demonstrated at Ice Harbor using PIT tags (Eppard et al. study). Given these technical shortcomings, the unreliability of balloon tag studies, and the demonstrated high survival rates at the Ice Harbor spillway using volitionally-passed radio tag fish, we find little technical basis for conducting the proposed study.

Second, we have not received a full study proposal for review, nor have we received any analyses supporting the hypothesis that tailrace elevations affect spillway survival. Various COE representatives have voiced the hypothesis that tailrace conditions affect spillway survival, but written data summaries, though promised to be forthcoming, have not materialized. In addition,

it appears that the concerns of our SRWG representatives may have been misconstrued in regard to this study and therefore we are taking this opportunity to clarify our concerns and our lack of support.

Third, the proposed study will significantly affect operations in the spring and runs contrary to our best professional judgment as to the best operations for fish. While this study may have originally been proposed to occur prior to the spring fish migration season, delays in the RSW installation have pushed the onset of the proposed study into spring spill operation period. This will result in a delay of the onset of spill, which we find unacceptable. Especially with the low flow conditions expected for 2005, we want to provide the best fish migration conditions possible, and this includes starting spill at Ice Harbor on April 3, as specified in the COE Fish Passage Plan. To date we have not seen compelling evidence to support the study hypothesis and justify this use of water resources.

In summary, we find the proposed study unnecessary, with potential detrimental effects on fish survival. Therefore we request that the COE not implement the study, and maintain the April 3 spill start date at Ice Harbor. In 2005, which the region agrees will be a critical water year, the initiation of MOP will have greater benefit if used for fish passage than if utilized for this study when there are many unaddressed technical issues. We ask the COE to address our concerns, beginning with the analysis that was used as support for originally conducting this study. There is ample time to deal with the technical issues this year regarding the underlying needs for this study. The state and tribal fishery co-managers will be developing their recommendations for the implementation of MOP.

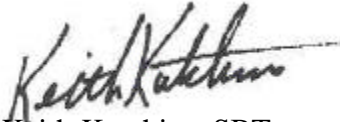
Sincerely,



Dave Statler, NPT



David Ward, ODFW



Keith Kutchins, SBT



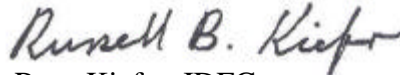
Bob Heinith, CRITFC



Cindy LeFleur, WDFW



Dave Wills, USFWS



Russ Kiefer, IDFG

Cc: Marvin Shutters, COE  
Mark Smith, COE  
Cindy Henriksen, COE