State, Federal and Tribal Fishery Agencies Joint Technical Staff Memo

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Date:  April 3, 2007

This memorandum is intended to serve as a formal comment on both the Fall/Winter Update to the 2007 Water Management Plan and the 2007 Fish Passage Plan concerning Winter Count Dates in the Lower Snake River, and the implementation of a zero flow operation in the Snake River from the months of December through February.  The January 22, 2007 Draft of the 2007 Fall/Winter Update to the 2007 Water Management Plan provides the following guidance regarding Snake River Zero flow.

**Snake River Zero Flow (Non-BiOp Action)**

According to the Lower Snake projects operating manuals, "From December to February, "zero" minimum project discharge is permitted on a limited basis. Under an agreement between the Corps of Engineers and the fishery agencies, zero riverflow is allowed for water storage during low power demand periods (at night and on weekends) when there are few, if any, actively migrating anadromous fish present in the Snake River...Water stored under zero riverflow conditions may maximize power production from the Columbia River Basin system, but zero riverflow operations are not recommended at Lower Snake projects when fish are actively migrating in the Snake River." Nighttime zero flow was discussed at the December X TMT meeting and was started December X. The consensus operation is to operate at zero flow no more than 6 hours between 2200 – 0600 hours. Generation at night may be required to provide project heating during cold weather.
In past years, winter video counts at Snake River projects have been the most useful tool in determining if “few, if any, actively migrating anadromous fish are present in the Snake River.” The fisheries agencies are concerned that winter counting in the Lower Snake river have diminished each year (Table 1). Winter counts are especially important as the Water Management Plan indicates that the action agencies can operate the Snake River projects at a zero river flow between the months of December and February when “few, if any, actively migrating anadromous fish are present in the Snake River.” Figure 1 displays both total and wild steelhead daily counts at Lower Monumental Dam from December 1, 2001 through February 28, 2002. This figure shows that adult steelhead can continue to move throughout the December through February period. The fisheries agencies believe that if the Action Agencies intend to use this flexibility in the future, that adult count data should be available to guide its implementation. The fisheries agencies recommend that the Water Management Plan and the Fish Passage Plan be changed in 2008 to state that that the Action Agencies will provide adult count data to assure we are following the agreed to protocol. Specifically, we recommend counts be available at all projects until the fish ladders are closed for annual maintenance. Prior to ladder closure, we recommend that the counting data be made available on a weekly basis for in-season review. We also believe that video counting be resumed at Lower Granite Dam when the ladder is reopened, even if a zero flow operation is not planned. This information could potentially allow us to develop a predictive tool for winter steelhead movement.

We appreciate the Action Agencies have limited the use of this authorized flexibility because it is not consistent with the principles of normative river management, and working with the salmon managers to develop an implementation plan to reduce potential impacts when this action is used.

Thank you for the opportunity to comment on this important aspect of the Fall/Winter Update to the 2007 Water Management Plan and the 2007 Fish Passage Plan.
Table 1. Winter video count schedules at the Lower Snake River FCRPS projects, 2004-2007.

<table>
<thead>
<tr>
<th>Dam</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Lower Granite Dam</strong></td>
<td>11/1/03 to 1/22/04</td>
<td>11/1/04 to 12/31/04</td>
<td>11/1/05 to 12/16/05</td>
<td>11/1/06 to 12/16/06</td>
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<tr>
<td><strong>Little Goose Dam</strong></td>
<td>11/1/03 to 3/31/04</td>
<td>11/1/04 to 12/31/04</td>
<td>No counts Nov, Dec, Jan, Feb, March then 4/1/06 through the season</td>
<td>No counts Nov, Dec, Jan</td>
</tr>
<tr>
<td><strong>Lower Monumental Dam</strong></td>
<td>11/1/03 to 3/31/04</td>
<td>11/1/04 to 12/31/04</td>
<td>No counts Nov, Dec, Jan, Feb, March then 4/1/06 through the season</td>
<td>No counts Nov, Dec, Jan</td>
</tr>
<tr>
<td><strong>Ice Harbor Dam</strong></td>
<td>11/1/03 to 1/22/04</td>
<td>11/1/04 to 12/31/04</td>
<td>All zeros, questionable data then 3/1/05 through the season</td>
<td>No counts Nov, Dec, Jan, Feb, and then 3/1/06 through the season</td>
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Figure 1. Total and Wild Steelhead daily counts at Lower Monumental Dam from December 1, 2001 through February 28, 2002.