



United States Department of the Interior
U.S. Fish and Wildlife Service

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Julie Collins
Administrator
Lower Snake River Compensation Plan
1387 S. Vinnell Way, Suite 343
Boise, Idaho 83709

July 20, 2018

Subject: Amended Proposed Action for the Snake River Fall Chinook Salmon Hatchery Programs and Request to Extend Existing Biological Opinion (TAILS #01EIFW00-2012-F-0448)—Snake River and Clearwater River Basins, Washington, Oregon, and Idaho—Technical Assistance
In Reply Refer To: 01EIFW00-2018-TA-1558

Dear Ms. Collins:

This letter transmits the U.S. Fish and Wildlife's (Service) response to a request to incorporate an amended Proposed Action (PA) into the existing 2017 Biological Opinion (Opinion) for the Snake River Fall Chinook Salmon Hatchery Programs (Programs), and to extend the existing Opinion. The Service received a letter on July 11, 2018 from the Lower Snake River Compensation Plan (LSRCP) with the amended PA enclosed. The LSRCP, as lead agency, sent the letter on behalf of the federal action agencies and the Programs' co-managers. The federal action agencies are LSRCP, the National Marine Fisheries Service (NMFS), and the Bonneville Power Administration (BPA). The Programs' co-managers are the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Nez Perce Tribe (NPT), the Oregon Department of Fish and Wildlife (ODFW), the Washington Department of Fish and Wildlife (WDFW), Idaho Department of Fish and Game (IDFG), and the Idaho Power Company (IPC). In addition to the requests identified above, the action agencies requested our acknowledgement that the changes described in the amended PA do not trip any triggers that would warrant reinitiation of consultation. For the reasons presented below, the Service acknowledges these requests and agrees that reinitiation of consultation is not warranted.

Amended Proposed Action and Consistency with Original Biological Opinion¹

Operation of Program Facilities – All hatcheries, associated satellite facilities, and attendant infrastructure remain unchanged from that described and evaluated originally. As no changes are

¹ This summary of the amended PA showing consistency with the 2017 Opinion is excerpted from the July 11, 2018 letter, with minor modifications for clarity.

proposed, impacts to the bull trout and its designated critical habitat associated with water withdrawals, hatchery effluent, fish disease, and maintenance activities have been adequately addressed in the 2017 Opinion. No reinitiation triggers have been tripped regarding this aspect of the Programs, thus no further discussion is warranted.

Broodstock Collection – All aspects of broodstock collection remain similar to that described and evaluated originally. As no significant changes are proposed (adult collections will be commensurate with production needs, but minor variances in adult numbers do not alter facility operations), impacts to the bull trout and its designated critical habitat have been adequately addressed in the 2017 Opinion. No reinitiation triggers have been tripped regarding this aspect of the Programs, thus no further discussion is warranted.

Juvenile Acclimation and Releases – Production numbers of juveniles have been modified with the amended proposed action. Previously, a total of 5.5 million juveniles were evaluated (4.6 million subyearlings and 900K yearlings), whereas the current proposal identifies 5.65 million juveniles for production and release (5.2 million subyearlings and 450K yearlings). As noted above, facility operations will not change (water usage and maintenance activities remain the same), and any changes in impacts to bull trout and its designated critical habitat related to hatchery effluent or fish disease will not be discernible at the level of this change. An additional change from that evaluated in the 2017 Opinion is the release of subyearling juveniles in the Salmon River (near the town of Whitebird, Idaho), previously released at Hells Canyon Dam. This action modification has already been identified and addressed as an insignificant change in a related Letter of Concurrence (TAILS ref. # 01FLSR00-2018-I-0003). Other release changes, in the form of increased or decreased release numbers at individual release locations, are outlined in Table 2 of the amended PA.

Overall, the 150K juvenile increase in production numbers, the heavier weighting of juvenile releases as subyearlings, the move of a single release location from the Hells Canyon reach of the Snake River to the Salmon River, and release number changes at a number of release sites, as described in this amended proposed action, do not fundamentally change effects to the bull trout or its designated critical habitat. These mainstem river system releases into bull trout foraging, migration, and overwintering (FMO) areas (or into smaller systems not occupied by bull trout), as noted in the original Opinion, are not expected to cause adverse effects. These proposed modifications fall well within the effects evaluated originally, thus no reinitiation triggers have been tripped.

Research, Monitoring, and Evaluation (RM&E) – Most aspects of RM&E remain similar to those described and evaluated in the 2017 Opinion. However, the cooperators are currently exploring monitoring needs to help assess the effects of changes in release strategies in the Hells Canyon reach of the Snake River. This assessment will include carcass recoveries as part of the ongoing redd surveys. Currently, the Idaho Power Company and U.S. Geological Survey are exploring a direct approach through carcass recovery and parental based tagging analyses in the Snake River.

Although not specifically identified in the 2017 Opinion, it should be noted that aerial and jet boat/underwater camera redd surveys will be occurring in the Hells Canyon reach of the Snake

River. Both of these activities fall under the broader bullet in the Opinion addressing these actions in the Snake Basin above Lower Granite Dam.² Where Chinook salmon carcasses are observed resulting from these redd surveys, ground crews will immediately follow up with carcass recoveries using boats.

All spawning ground surveys, regardless of location or method (including ground-based surveys), were determined to result in only minor or insignificant effects to the bull trout or its designated critical habitat. Similarly, snorkeling was determined to result in only minor or insignificant effects in the identified river systems where it was being implemented. All of these activities occur in bull trout FMO habitat and result in minor and temporary disturbance-related effects. The addition of carcass collections to the concurrent redd surveys in the Snake River, is also expected to be limited to minor or insignificant effects to bull trout and its designated critical habitat, similar to the effects described in FMO habitat in the lower Tucannon, lower Clearwater, Salmon, Grande Ronde, or Imnaha Rivers for these types of activities. Temporal and spatial effects to the bull trout and its designated critical habitat from these activities are not expected to result in adverse effects, and fall well within the effects evaluated originally, thus no reinitiation triggers have been tripped.

Conclusion

The specific changes identified above did not result in any adverse effects to the bull trout or its designated critical habitat. The Service agrees that the proposed modifications/clarifications are within the range of effects analyzed in the 2017 Opinion and do not materially change the effects analyses, the non-Jeopardy conclusion, or the intent of the Incidental Take Statement, and thus do not trip any reinitiation triggers. All other aspects of the 2017 Opinion (e.g., conservation measures, take numbers, and Terms and Conditions) remain valid; the Federal action agencies will adhere and abide by these measures. The Service therefore acknowledges the action agencies' conclusions and agrees that these changes be adopted into the existing Opinion for the term of the new NMFS section 10 permits authorizing the continued operation of the Programs.

If the PA addressed in this letter is modified, environmental conditions change, or additional information becomes available regarding potential effects on listed species not already considered, you should verify with the Service that your conclusions are still valid.

² See the bottom of p. 63 of the 2017 Opinion.

Thank you for your continued interest in the conservation of threatened and endangered species. Please contact Clay Fletcher (971-701-1497) or Russ Holder (208-378-5384) if you have questions regarding this letter.

Sincerely,

for Gregory M. Hughes
State Supervisor

cc: LSRCP, Boise (Robertson)
USFWS, La Grande (Meyer, Sausen)
USFWS, Spokane (MacRae, Eames, Kuttel)
USFWS, Orofino (Nemeth)
BPA, Portland (Grange)
NMFS, Portland (Preston, Busack, Purcell)
CTUIR, Pendleton (Zimmerman)
NPT, Lapwai (Johnson, Hesse)
ODFW, Enterprise (Yanke)
WDFW, Dayton (Bumgarner)
IDFG, Boise (Hebdon)
USGS, Cook (Tiffan)
IPC, Boise (Rosenberger)