DRAFT
Department of Ecology

## Condit Dam Decommissioning

**Project Assumptions**
**And**
**Project Management Structure**

6/25/ 2001

**Project Objective:**

By March 1, 2002, issue a 401 Water Quality Certification or other permitting document to allow major watershed restoration within the lower White Salomon River (e.g., removal of Condit Dam) to meet the legal obligation (MOA) of 1998 with PacifiCorp.

**Project Issues:**

- Timing of certification or other permitting document is short, less than a year away (March 1, 2002).
- Current WQ Regulations and Rules have legal and regulatory problems that increase liability.
- Final schedule of the new WQ Standards Rule is taking longer than what the Condit Dam Decommissioning project schedule allows.
- FERC's development of environmental review documents (draft EIS, etc.) will finalize *after* Ecology reaches a decision. SEPA will be required for this project.
- Local county governments are opposed to removal of Northwestern Lake and the beneficial uses that are derived from it.
- Significant acute degradation of water quality over 3 ~~year~~ plus years.
- Long-term mitigation commitments needed.
- Uncertainty in the US western power market and the possibility due to project constraints or missed deadline(s) PacifiCorp takes its option to cancel agreement.

A6-96
Continued

**UNITED STATES DEPARTMENT OF COMMERCE**
**National Oceanic and Atmospheric Administration**
NATIONAL MARINE FISHERIES SERVICE
PORTLAND OFFICE
1201 NE Lloyd Boulevard, Suite 1100
PORTLAND, OREGON 97232-1274

F/NWR5

November 15, 2005

Derek Sandison
SEPA Responsible Official
15 W. Yakima Ave, Suite 200
Yakima, WA 98902-3452

RE: Comments, Condit Dam Draft SEPA Supplemental Environmental Impact Statement

Dear Mr. Sandison:

The National Marine Fisheries Service (NMFS) has reviewed the Washington Department of Ecology's (WDOE) September 30, 2005, *Condit Dam Removal Draft SEPA Supplemental Environmental Impact Statement* (SEIS). The draft SEIS was completed under the State Environmental Policy Act (SEPA) and addresses the proposed removal of Condit Dam. Condit Dam is located on the White Salmon River (River Mile 3.3), a tributary to the Columbia River, in Skamania and Klickitat Counties, Washington. We appreciate the opportunity to review the draft SEIS and provide the following comments.

**Section 1.6.3, Page 1-8, *Aquatic Resources*, second paragraph:** The draft SIES states that one-year class of chum salmon will be lost and that the impact will last several generation cycles due to suspended and deposited sediment. Based on timing and current use of the White Salmon River by Columbia River chum salmon, NMFS believes that the draft SEIS overstates the potential impact. A7-1

First, adult chum salmon typically return to the lower Columbia River from mid-October through December, and spawn from mid-November to mid-January. The draining of the reservoir is scheduled to occur in mid-October. Thus, it is unlikely that chum salmon will be present before the reservoir is drained, and if present, it is improbable that spawning will have occurred prior to the release of reservoir sediments. Additionally, chum salmon arriving at the White Salmon River after the reservoir is drained could easily move to other tributaries or back below Bonneville Dam to spawn—which is probably what most of these fish do now (see following paragraph). A7-2

Second, over the last several years few chum salmon have been observed in Columbia River tributaries between the Dalles Dam and Bonneville Dam. One male carcass and one female carcass were observed during surveys of the White Salmon River in 2002, but it was not known if they spawned in this stream or elsewhere. Furthermore, the female had retained over 75 percent of her eggs and was therefore considered to have had poor spawning success (Ehlke and Keller 2003). No chum salmon were observed in the White Salmon River and other tributaries above Bonneville Dam in 2003, and none were observed in the White Salmon River in 2004, (Keller 2004, PSMFC 2005). Additionally, radio tracking studies demonstrate that many of the A7-3



A7-1
Comment acknowledged. Impacts to chum are more clearly stated in the FSEIS. Only two chum salmon have been documented in recent years and there is no evidence that spawning is occurring in the White Salmon River.

A7-2
Comment acknowledged. The FSEIS has been modified where modifications are appropriate.

A7-3
Comment acknowledged and additional information has been incorporated in the FSEIS, as appropriate.

adult chum salmon tagged at Bonneville Dam are last detected downstream of this dam (Keller 2004).

A7-3 Continued

Lastly, NMFS agrees that the lower three miles of the river may be unusable by chum salmon adults for a number of years; but, any chum salmon returning the following season will have access to reaches above the current reservoir should they choose to remain in the White Salmon River to spawn. However, as we have pointed out, at this time there appears to be very little, if any, use of the White Salmon River by the Columbia River population of chum salmon. Therefore, NMFS does not expect any population-level impacts from the proposed dam removal. The draft SEIS should be revised accordingly.

A7-4

**Section 1.6.3, Page 1-8, *Aquatic Resources*, third paragraph:** The use of the word "significant" to portray impacts on Endangered Species Act (ESA)-listed salmon species due to the sediment plume in the Columbia River is misleading. NMFS agrees that normal migration behavior in the Columbia River could be altered, and that this is a form of "take" under the ESA. However, we do not expect the sediment plume to kill any individuals of ESA-listed salmon species occurring in the Columbia River. Furthermore, NMFS finds that virtually no juveniles and only a fraction of the adults from upriver fall Chinook salmon and steelhead populations occur in the Bonneville pool during the later half of October (DART 2005). Consequently, no population-level effects are anticipated on upriver ESA-listed species and thus the word "significant" overstates the impact.

A7-5

**CONCLUSION**

In general, the draft SEIS does a good job of describing the action and analyzing its effects. Regretfully, NMFS' limited staff resources and time have precluded a more thorough analysis of the draft SIES. However, we strongly recommend that our comments provided here be considered for the final SEIS. If you have any questions regarding this letter, please contact Scott Carlon of my staff at 503-231-2379 or by email scott.carlon@noaa.gov.

A7-6

Sincerely,

for Keith Kirkendall, Chief
FERC and Water Diversions Branch
Hydropower Division

cc: Lou Ellyn Jones, USFWS
Carl Dugger, WDFW
Bob Heinith, CRITFC
Gail Miller, PacifiCorp

A7-4
Chum salmon have less capacity to leap water falls and generally do not migrate as far upstream as Chinook, coho, or sockeye salmon and steelhead trout, particularly in higher gradient rivers with frequent falls, such as the White Salmon River (Johnson et al. 1997). Reiser et al. (2006) set the maximum jumping height of chum salmon as 4 feet. The fall at RM 2.6 on the mainstem of the White Salmon and other falls on the mainstem may be barriers to the upstream migration of chum salmon adult spawners. Because chum salmon characteristically utilize the lower reaches of high-gradient streams, they may not be able to access this habitat, and additional year-classes may be affected until clean spawning gravels are formed in the lower couple of miles of river channel. The documentation of two adult chum salmon is not evidence that chum salmon are reproducing in the White Salmon River at the present time, but represents the potential for eventual recolonization of the river if suitable spawning habitat is available. The long-term effect of dam removal would be an improvement of spawning conditions for chum salmon, but it is not known at this time if chum salmon would be able to utilize additional habitat above the dam. The lack of population-level impacts is acknowledged in Section 4.3 of the FSEIS.

A7-5
Comment acknowledged. The FSEIS has been modified where appropriate.

A7-6
Comment acknowledged.

## REFERENCES

DART (Columbia River Data Access in Real Time). 2005. Available on the internet at http://www.cqs.washington.edu/dart/dart.html.

Ehlke, R.D. and K. Keller 2003. 2002 chum salmon spawning ground surveys on the mainstem Columbia River and its Washington Tributaries. Annual report prepared for the Bonneville Power Administration by the Pacific States Marine Fisheries Commission. Vancouver, WA.

Keller K. 2004. 2003 Columbia River chum salmon return. Report prepared for the Bonneville Power Administration, Portland, Oregon.

PSMFC (Pacific State Marine Fisheries Commission). 2005. 2004 Columbia River chum salmon return, Annual Report. Prepared for the Bonneville Power Administration, Portland, Oregon.

**Sandison, Derek**

**From:** Bill Bakke [bmbakke@qwest.net]
**Posted At:** Thursday, October 20, 2005 12:46 PM
**Conversation:** Condit Dam Removal
**Posted To:** Condit Dam
**Subject:** Condit Dam Removal

Native Fish Society

October 20, 2005

The Native Fish Society supports the removal of Condit Dam on the Big White Salmon River. I have been involved in early discussions regarding removal of Condit Dam. The removal of this dam will open the Big White Salmon River to anadromous fish migration and production, however it is a concern that a fish re-introduction plan be developed by the states, tribes and public. The Native Fish Society supports natural re-colonization of this watershed rather than hatchery releases. If the state of Washington and the tribes decide to use hatchery-origin fish to reintroduce salmon and steelhead into this basin it should be based on genetic guidelines that would lead to naturalized populations. The worst possible reintroduction plan would be to use the river as a hatchery dump to support consumptive fisheries in the river and in the Columbia or ocean fisheries. At this time it is uncertain which course of action the state will take. We also expect that the state of Washington will follow the requirements of the Washington Wild Salmonid Policy.

A8-1

A8-2

From a fish conservation perspective, removal of Condit Dam holds great promise, but the methods used to reintroduce these fish have a bearing on whether the full ecological value of dam removal will be achieved.

Bill M. Bakke
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11/15/2005

A8-1
Comment acknowledged.

A8-2
Comment acknowledged. Management decisions concerning hatchery fish planted in the river would be decided by the appropriate state and federal agencies (i.e., Washington Department of Fish and Wildlife and NOAA Fisheries) and not as part of an FSEIS. In the case of many salmonid species (coho, chum, Chinook, and possibly others), native fish populations may no longer exist.