



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Washington Fish and Wildlife Office
Central Washington Field Office
215 Melody Lane, Suite 103
Wenatchee, WA 98801-8122

In Reply Refer to:
01EWF00-2016-TA-0002

Kimberly B. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, D.C. 20426

RE: U.S. Fish and Wildlife Service Response to Request for Concurrence under the Endangered Species Act (Priest Rapids Hydroelectric Project No. 2114)

Dear Ms. Bose:

This letter responds to your draft Biological Assessment (BA), dated June 12, 2015. The Federal Energy Regulatory Commission (Commission) requested concurrence on its determinations that Grant County's Interim Fish Passage Operations Plan (Interim Plan) resulting from an emergency drawdown resulted in a "not likely to adversely affect" for bull trout and did not destroy or adversely modify designated critical habitat for bull trout. The U.S. Fish and Wildlife Service (Service) received this request for concurrence on September 15, 2015.

On February 27, 2014, a 2 inch-wide, 65-foot-long horizontal fracture was discovered on a spillway pier at Wanapum Dam. An immediate drawdown of the Wanapum Reservoir commenced. The Wanapum development and the Priest Rapids development comprise the Priest Rapids Hydroelectric Project No. 2114, licensed to the Public Utility District No. 2 of Grant County (Grant PUD). On March 19, 2014, the Commission staff initiated emergency consultation under the Endangered Species Act with the Service and designated Grant PUD the Commission's non-federal representative for consultation. Under the Interim Plan, Grant PUD modified the exits of the left and right bank fishways at Wanapum Dam. Weir boxes were installed near the exit of each fishway and supplied with flow via four electric pumps stationed at each ladder. The weir boxes used a false weir to attract fish from the fishway pools. Fish attracted from the pools swam past or jumped the false weir and entered a flume which descended to the forebay close to the water surface near the existing fishway exit. The Interim Plan does not represent a change in the level of incidental take issued by the Service for bull trout during previous Endangered Species Act section 7 consultations with Grant PUD for the Priest Rapids Hydroelectric Project.

We have reviewed the draft BA and conclude it is adequate regarding the effects of the Interim Plan on the bull trout and its critical habitat. Even though the duration of the emergency drawdown was short-term in nature and Grant PUD's Interim Plan minimized


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those effects and associated take to the extent possible, we disagree with your effect determination of "not likely to adversely affect." We believe adverse effects occurred to bull trout and its critical habitat due to the temporary disruption of upstream fish passage for bull trout at the Wanapum Dam. The Service feels a "likely to adversely affect" determination would be more appropriate for this emergency situation. As such, we will issue an after-the-fact biological opinion on the implementation of the Interim Plan. Section 7 allows the Service up to 90 calendar days to conclude formal consultation with the Commission and an additional 45 calendar days to prepare our biological opinion.

Thank you for your assistance in the conservation of listed species. If you have any questions or comments regarding this letter, please contact Stephen Lewis at the Central Washington Field Office in Wenatchee at (509) 665-3508, extension 2002, or via e-mail at Stephen_Lewis@fws.gov.

Sincerely,

Handwritten signature of Eric V. Rickerson in black ink. The signature is cursive and includes the name "Eric V. Rickerson" and the acronym "FWS" written below it.

Eric V. Rickerson, State Supervisor
Washington Fish and Wildlife Office

cc:

NOAA, Portland, OR (Scott Carlon, scott.carlon@noaa.gov)Grant PUD, Ephrata, WA (Tom Dresser, TDresse@gcpud.org)

Document Content(s)

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