Review of the John Day Minimum Operating Pool Draft Feasibility Plan of Study
State of Oregon
April 2012

Oregon appreciates the opportunity to review and comment on NOAA Fisheries' document entitled "John Day Minimum Operating Pool Draft Plan of Study", dated March 2012 (POS). The document describes the actions NOAA Fisheries, the U.S. Army Corps of Engineers (Corps), the Bureau of Reclamation and the Bonneville Power Administration would take to conduct a feasibility study of the effects of operating the John Day Reservoir at "Minimum Operating Pool" (MOP). Operating John Day Reservoir at MOP is a "long-term contingency" in the 2010 Supplemental Biological Opinion (2010 Supplement) for the Federal Columbia River Power System (FCRPS) and is described in the Adaptive Management Plan for Long Term Contingencies (NOAA Fisheries 2009). The operation would be implemented if and when a set of identified "triggers" are tripped.

The POS was presented to the Regional Implementation Oversight Group for review and comment at a February 22, 2012 meeting, with comments due by April 30, 2012. The POS describes various studies necessary to evaluate the effectiveness of operating the John Day Reservoir at MOP to decrease travel time of spring migrating salmonids and the impacts to other resources and aspects of the Columbia River and it users. It also describes the process the Corps would use to conduct and prepare National Environmental Policy Act (NEPA) documentation necessary to seek authority from Congress to mitigate for impacts related to a proposed action of operating the John Day Reservoir at MOP.

Oregon has long advocated operating the John Day Reservoir at MOP, subject to appropriate mitigation for related impacts on irrigation and wildlife, as a primary measure to reduce water and fish travel time through the reservoir in order to increase survival of migrating salmonids. Although the POS appears comprehensive, the Biological Studies section should include analyses of water and fish travel time and fish survival changes using PIT tag data and tools that are currently being collected as part of the Fish Passage Center's Smolt Monitoring Program, the Comparative Survival Study and other PIT tag programs. The POS should also evaluate actions necessary to ensure that operation of the PIT tag detectors in the McNary and John Day bypass systems are not affected by drawdown of the John Day Reservoir. With these facilities in operation, PIT tagged fish detected at McNary Dam can be used as mark groups for evaluating survival and travel time through John Day Reservoir and between John Day and Bonneville dams. These analyses would be based on marked fish detected at John Day and Bonneville dams, and in the trawl in the estuary. Installation and operation of spillway detectors would enhance monitoring the effects of drawdown.

In addition to advocating for operating the John Day Reservoir at MOP, Oregon has advocated that the POS should be conducted immediately, rather than waiting for any triggers to be tripped. The POS will be lengthy and involve numerous and often

divergent interests. Therefore in order for the Corps to complete the NEPA process and obtain authority from Congress so that the operation can be implemented when the triggers are tripped, not several years subsequent, the POS should be underway now.

References

NOAA Fisheries. 2009. Adaptive Management Implementation Plan 2008-2018 Federal Columbia River Power System Biological Opinion. NOAA Fisheries. Portland, OR Sept. 11, 2009