Response to the April 2012 State of Oregon's Comments on the *John Day Minimum Operating Pool Draft Feasibility Plan of Study*

Oregon comment 1: *"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."*

Corps response to comment 1: Agree with use of PIT data, PIT detection systems, and analysis of water and fish travel time. We believe this is reflected in our study plan report that you reviewed. The following text was included in the draft report regarding biological evaluations:

"The central hypothesis of the JD MOP operation is that fish survival would increase due to decreased travel time for juvenile spring migrants through the John Day Reservoir and earlier ocean entry time. The effect of decreased travel time and earlier ocean entry on salmon and steelhead survival will first be explored using the updated COMPASS and other existing information from years of field studies and monitoring. No additional field studies are anticipated. Existing data that would be analyzed to assess effects of the MOP operation on survival and travel time include:

1. *Data from PIT-tagged fish detected at McNary and John Day Dams*
2. *Lower Columbia River acoustic telemetry study data"*

Water travel time was included in the original John Day Drawdown study report and is summarized in Attachment 3 of the draft report that was sent to ODFW for their review. We do not believe that a new analysis of water particle travel time will produce a different result, however we leave it open to revisit per the Regional workshop proposed in our report:

"*To initiate the study a workshop would be conducted for detailed planning for the biological and habitat studies that would need to be accomplished in order to assess the overall benefits and detriments to the targeted stock, as well as other anadromous and resident fish, aquatic organisms, habitat and wildlife. The workshop would also be the vehicle to work with the Region to initially identify a range of potential alternative measures that would subsequently be screened and ranked for their potential to provide benefits to compare with the proposed MOP operation. A complete literature search would be conducted and reported at the workshop to assist in determining what is known regarding these issues and what data gaps would be necessary to fill in order to make a final decision on the merits of the proposed operation. Resulting studies would involve the collection of data, conduct of physical and/or numerical model studies and tests to establish baseline project conditions and to assess and predict the effects that operation at MOP and the other alternatives would have on anadromous fish and other organisms as described herein and in the next section below."*

Regarding ensuring maintaining PIT detection capability at John Day and McNary Dams: we agree with Oregon's comment and think this is covered in the draft report. Drawdown of the John Day reservoir will affect the McNary juvenile bypass outfall and may affect fish guidance efficiency. Both of these effects may have influence on juvenile fish PIT detection at these dams and investigation of these effects are recommended in our draft report. In addition, we recommended using PIT data from McNary and John Day Dams to assess the effect of the MOP operation on juvenile fish survival and travel time.

Oregon Comment 2: *"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"*

Corps response to comment 2: It would be premature to start NEPA prior to a trigger because 1. We need to capture current conditions, which may change between now and if a trigger is tripped in the future; 2. we would need to include the most recent fish data for the benefits analysis and 3. we need to know the ESU that is triggered to assess benefits of MOP and other alternatives. Any analysis done prior to tripping a trigger will need to be redone if a trigger is tripped in the future.