



FISH PASSAGE CENTER

847 NE 19th Avenue, #250, Portland, OR 97232

Phone: (503) 833-3900

Fax: (503) 232-1259

www.fpc.org/

e-mail us at fpcstaff@fpc.org

MEMORANDUM

TO: Scott Fielding, COE John Day Dam
Nathan McClain, COE Portland District
Tom Lorz, CRITFC (FPOM Condition Monitoring Task Group Co-Chair)
Leah Sullivan, BPA (FPOM Condition Monitoring Task Group Co-Chair)

Michele DeHart

FROM: Michele DeHart, FPC

DATE: January 15, 2021

SUBJECT: Comments on Draft MOC 20JDA21 (*COVID-19 Daytime condition sampling proposal*) updated on December 16, 2020

Following discussions of the Fish Passage Maintenance and Operations (FPOM) Condition Monitoring task group on December 15, 2020, an updated draft of MOC 20JDA21 was circulated to the FPOM distribution list for review. Since this draft was circulated, additional discussions on 2021 condition monitoring at John Day Dam (JDA) have occurred and it is our understanding that the Condition Monitoring task group will meet in the next week or so to further discuss 2021 monitoring at JDA. In preparation for that discussion, the Fish Passage Center (FPC) staff offers the following comments on the December 16, 2020 draft MOC 20JDA21. For reference, the December 16, 2020 draft MOC (20JDA21) is appended to the end of this document.

- The proposal for 2021 sampling at JDA is not the Smolt Monitoring Program. What is proposed is daily condition monitoring only.
- The proposed target sample size of 300-500 fish, daily, is inconsistent with the regionally coordinated condition monitoring protocol and will likely lead to increased handling. ***We recommend reducing the target sample size to a level that is consistent with the condition monitoring protocol and adequate for condition monitoring purposes.***
- Language in Item #3 of Analysis of Potential Impacts to Fish section needs to be changed if the proposed target sample size of 300-500 fish per daily sample remains.

The Proposal for 2021 Sampling at JDA is not the Smolt Monitoring Program

Under normal conditions, Smolt Monitoring Program (SMP) personnel at JDA would conduct index sampling (i.e., 24-hour sample) every-other-day, except during periods of high temperatures. During this index sampling, SMP staff would also collect condition monitoring data on a subsample of the full sample. Due to COVID-19 restrictions in 2020, sampling at JDA was reduced to a condition only sample (~6 hours), every other day. This means that index sampling did not occur in 2020 and, therefore, normal SMP data were not collected. Due to continued COVID-19 restrictions in 2021, 20JDA21 proposes to continue the reduced sampling at JDA for condition only. However, unlike what was done in 2020, this condition only sample would occur every day. While 20JDA21 indicates that the proposed condition sampling at JDA would be conducted by SMP staff, the data that will be collected at JDA in 2021 are not SMP data, as index sampling will also not occur in 2021. This means that, for the second year in a row, SMP funds will have been used for condition monitoring only at JDA (a COE responsibility), while SMP data have not been collected (i.e., index sampling).

The Proposed Target Sample Size of 300-500, Daily, is Inconsistent with the Regionally Coordinated Condition Monitoring Protocol and will Likely Lead to Increased Handling.

Under normal conditions, with 24-hour index sampling, the SMP targets 300-500 fish per sample. These target sample sizes are intended to strike a balance between obtaining accurate estimates of total collection while limiting handling to the degree possible. The take estimates for the SMP handling permit at JDA are based on every-other-day, 24-hour, sampling at these target sample sizes. According to 20JDA21, the target sample size of 300-500 fish per sample would remain except that this target sample would occur every day and would be used for condition monitoring purposes only (i.e., no SMP index sampling). This is inconsistent with the regionally coordinated condition monitoring protocol. According to the condition monitoring protocol, ~100 fish of each of the predominant species is adequate for condition monitoring purposes. As proposed, targeting 300-500 fish per daily condition sample will likely lead to increased handling at JDA. The FPC has worked closely with NOAA over the last several years to reduce handling under the SMP. It does not seem logical to potentially increase handling at JDA to collect more fish than are necessary for condition monitoring, particularly in the absence of index sampling. *We recommend reducing the target sample size to a level that is consistent with the condition monitoring protocol and adequate for condition monitoring purposes.* The need for 300-500 fish for accurate estimates of total collection at JDA was eliminated with the removal of index sampling.

Language in Item #3 of Analysis of Potential Impacts to Fish Section Needs to be Changed if the Proposed Target Sample Size of 300-500 Fish Per Daily Sample Remains.

For the reasons stated above, we believe the language in the first sentence of Item #3 of the Analysis of Potential Impacts to Fish is incorrect as it currently reads. This first sentence currently states, “Daytime sampling will reduce the number of fish impacted during handling and holding”. It is true that holding times may be reduced under this operation. However, if the target sample size under the proposed condition only sampling remains at 300-500 fish, the number of fish impacted may be increased under this proposal, as the proposal calls for 300-500

fish per daily sample, which is an increase from the normal protocol of 300-500 fish per every-other-day sample.

OFFICIAL COORDINATION REQUEST FOR NON-ROUTINE OPERATIONS AND MAINTENANCE

COORDINATION TITLE– *20JDA21 COVID-19 Daytime condition sampling proposal*

COORDINATION DATE– **9 December 2020 Updated 16 December 2020**

PROJECT– **John Day Dam**

RESPONSE DATE – **7 January 2021**

Description of the problem

Current COVID-19 preventative measures require reduced staffing at the Smolt Monitoring Facility (SMF) at John Day Dam and maximizing telework of Army Corps staff. Currently, only one Army Corps staff is allowed at the Smolt Monitoring Facility until COVID-19 restrictions are lifted. The COVID-19 restrictions and the limited staffing at John Day Dam requires some changes to the sampling protocols at John Day Dam. John Day Fisheries propose the following condition sampling protocol for the 2021 fish passage season:

Starting 1 April 2021, the John Day SMF will sample and collect juvenile fish from 0700 to 1300 (or earlier or later depending on needs) for condition sampling. The condition sampling strategy will target 300-500 fish per sample day. Condition sampling will be conducted by Pacific States marine Fisheries Commission (PSMFC) staff. This sampling strategy will continue daily until river temperatures reach 70-degrees. If river temperatures reach 70 degrees, warm water sampling protocols established in the Fish Passage Plan (FPP: Appendix K section 2.4.) will be followed. Similar COVID-19 and warm water protocols were followed during the 2020 fish passage season (see 20JDA02 MFR).

Due to COVID-19 restriction, the Fish Passage Plan (2020) sampling protocol, sample 24 hours every other day at John Day Dam, could not be followed. John Day Fisheries personnel cover the swing and graveyard shift to monitor the separator bars and screen cleaners. SMP staff (PSMFC staff) conducts sampling in the morning. (FPP: Appendix K, section 2.3). To meet COVID-19 preventative measures in 2020, the staff was reduced at the SMF and condition sampling was conducted every other day from 0700-1300. From 1300-0700, the switch gate will be positioned to divert fish and flow to the river with fish passing through the full flow pit array before exiting the system. All other Fish Passage Plan criteria for the SMF, JBS, and adult fishways were met.

Type of outage required - None

Impact on facility operation (FPP deviations) Change from 24 hour, every other day sampling to everyday sampling between 0700-1300 (or earlier or later depending on needs). The only change to facility operations is the number of staff on-site daily to meet COVID-19 preventative measures. This will include USACE and PSMFC staff at the SMF. This will prevent the Smolt Monitoring Program's index sampling similar to COVID-19 sampling protocols implemented with MFR 20JDA02.

Impact on unit priority No impacts to unit priority. The FPP will be followed for unit priorities.

Impact on forebay/tailwater operation No impacts to forebay/tailwater operations.

Impact on spill None, spill would follow the FPP.

Dates of impacts/repairs These measures are anticipated to begin 1 April 2021.

Length of time for repairs These measures will remain in place until COVID-19 restrictions are lifted and John Day SMF is fully staffed.

Analysis of potential impacts to fish

1. 10-year average passage by run during the period of impact for adults and juvenile listed species, as appropriate for the proposed action and time of year;

Adult passage season is from March 1st to November 30th and the proposed action will not impact adult passage. Juvenile passage is operated from April 1st through September 15th. Changing the sampling strategy could decrease the number of adult fallbacks passing over the wetted separator during SMF operations and reduce the number of juvenile fish passing over the wetted separator as well. This sampling strategy will decrease the number of juvenile fish being held prior to sampling conducted by PSMFC personnel. The average holding time for juvenile fish in the collection tanks at John Day is approximately 9.5 hours during 24-hour sampling strategy. Reducing this holding time will not impact juvenile fish collected in the SMF.

2. Statement about the current year's run (e.g., higher or lower than 10-year average);
No impact to current year's run.

3. Estimated exposure to impact by species and age class (i.e., number or percentage of run exposed to an impact by the action); Daytime sampling will reduce the number of fish impacted during handling and holding. The number of hours needed to complete every day sampling is 6 to 8 hours daily. The reduction in sampling hours reduces the impact of fish crossing the wetted separator, reduces holding times, and handling times for all species and life stages.

4. Type of impact by species and age class (increased delay, exposure to predation, exposure to a route of higher injury/mortality rate, exposure to higher TDG, etc.);
No significant impacts are anticipated with changing the sampling strategy from 24-hour every-other-day to every day sampling.

Summary statement - expected impacts on:

Downstream migrants No impacts to downstream migrants. The alternative sampling strategy will benefit juvenile migrants since fewer juvenile fish will be handled, held or cross the separator. The JBS does have full flow PIT tag detection which will allow fisheries managers to analyze the number of PIT tagged fish passing through the JBS during non-sampling hours.

Upstream migrants (including Bull Trout) No impacts to adult bull trout and no evidence that adult bull trout are falling back through the JBS at John Day.

Lamprey No impacts to adult with this sampling strategy. The COVID-19 daytime condition sampling strategy could impact the number of juvenile lamprey sampled at John Day. The COVID-19 condition sampling in 2021 will be challenging to collect large numbers of lamprey that have been seen in previous years. The staff at John Day's Smolt Monitoring Facility will work with researchers to collect additional fish if needed. Sampling times could be adjusted to increase the possibility of collecting more lamprey during the early parts of the fish passage season. These adjustments could be starting the sample at 0600 rather than 0700 and monitoring river conditions and weather events that may trigger lamprey migration (freshets, rain events, and turbidity). The impact during 2021 will be like 2020 but the 2021 sampling strategy will collect fish everyday until we reach 70-degree water temperatures which will limit the sampling to Monday's and Thursday's. Coordination between USACE, PSMFC, and researchers will need to continue throughout the 2021 passage season to ensure all parties are aware of limitations and challenges during the passage season.

Comments from agencies

Final coordination results

After Action update (After action statement stating what the effect of the action was on listed species. This statement could simply state that the MOC analysis was correct and the action went as expected, or it could explain how the actual action changed the expected effect (e.g., you didn't need to close that AWS valve after all, so there was no impact of the action). List any actual mortality noted as a result of the action)

Please email or call with questions or concerns.

Thank you,

Scott Fielding
Fisheries Chief
John Day Dam
Scott.D.Fielding@usace.army.mil

Nathan McClain
NWP Operations Division Fishery Section
Columbia River Coordination Biologist (temporary)
Nathan.A.McClain@usace.army.mil