



Oregon

Kate Brown, Governor

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Tammy Mackey
Chief, Fisheries Section
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Corps of Engineers, Portland District
PO Box 2946
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Dear Ms. Mackey:

ODFW appreciates the opportunity to comment on the Memo of Coordination (MOC) 18WVP01 Trout and M&E. While we acknowledge the Corps' efforts to reach out to the WATER teams for input on their funding priorities as a result of discussions last year, the prioritization exercise put before us in 18WVP01 does not meet the intent of our request last year. ODFW and other members of WATER expressed concern over funding decisions being made without input from WATER; our request was to be engaged in the O&M funding discussion overall. This concern is again renewed, as the Corps has indicated the lack of funding is not limited to a one-year shortfall, as was indicated last year.

Unfortunately, the MOC presents a false dichotomy. The Corps has obligations to fully fund both the trout mitigation and RPA requirements presented in the MOC. There are social, political, and even legal risks if the Corps is unable or unwilling to meet both of these obligations. It is not the role of ODFW or WATER to direct your risk tolerance or to assume these risks for you. This is a risk tolerance question that needs to be addressed by the Corps' leadership.

The Corps' trout mitigation responsibility is first described in House Document 531, with production levels further affirmed through numerous agreements between the State and the Corps (including, but not limited to, Cooperative Agreements in 1990 and 2012). In addition, the Willamette Biological Opinion authorizes up to 277,000 pounds of trout production as hatchery mitigation. ODFW has detailed the importance of the trout program in previous correspondence with the Corps (letter from B. Graham-Hudson to Tammy Mackey, 2/26/18). Any reductions in this mitigation trout program will be met with strong opposition from the State and our constituents.

The baseline hatchery RME (described as Baseline M&E in the MOC) required in Chapter 9 (Reasonable and Prudent Alternative) of the Willamette Biological Opinion is described in Section 9.5. Although the RPA measure details numerous components required as part of the baseline hatchery RME, the MOC refers only to 'spawning ground surveys'. It is unclear from the MOC how comprehensive those surveys might be (above and below dams, frequency, locations, etc.), and if they will meet the RPA requirements. ODFW strongly supports the need for the baseline hatchery RME program and data as required by the RPA.

The MOC also describes potential impacts of trout stocking on spring Chinook, winter steelhead, and resident fish populations, and indicates you “do not have specific studies to cite”. Rainbow trout are primarily invertivores, and although predation on other juvenile fish is possible, numerous studies funded by the Corps have evaluated that possibility, and data suggest that this occurs at a very low level relative to actual piscivores and dam mortality. We suspect that concentrations of escaped hatchery rainbow trout in some tailraces (DET-BC) could constitute predation hotspots, again primarily due to the influence of the dams. Other specific references that could be reviewed and cited in the MOC include:

- <http://odfw.forestry.oregonstate.edu/willamettesalmonidrm/sites/default/files/hatchery-research/03Report.pdf> (Pages 30-31)
- <http://odfw.forestry.oregonstate.edu/willamettesalmonidrm/sites/default/files/hatchery-research/04Report.pdf> (Pages 66-69)
- http://odfw.forestry.oregonstate.edu/willamettesalmonidrm/sites/default/files/reservoir-research/life-history_characteristics_in_reservoirs_annual_2011.pdf (Pages 39-49)
- http://odfw.forestry.oregonstate.edu/willamettesalmonidrm/sites/default/files/reservoir-research/life-history_characteristics_in_reservoirs_annual_report_2012_-final.pdf (Pages 50-53)
- http://odfw.forestry.oregonstate.edu/willamettesalmonidrm/sites/default/files/reservoir-research/life-history_characteristics_in_reservoirs_2013-final.pdf (Section 4)

In summary, the MOC 18WVP01 Trout and M&E presents a false dichotomy. Both the mitigation trout production and baseline hatchery RME called for in the Willamette BiOp RPA are obligations of the Corps and should be fully funded. Please let me know if you have any questions about these comments.

Sincerely,



Bernadette Graham Hudson
West Region Manager

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