



Oregon

Kate Brown, Governor

Department of Fish and Wildlife

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May 21, 2018

Chris Walker
US Army Corps of Engineers
Operations Division
Fish Biologist



re: ODFW Comments for 18WVP02 MFR Winter Steelhead Maximum Spawning Flows in the North and South Santiam Rivers

Dear Chris:

ODFW appreciates the opportunity to review 18WVP02 MFR Winter Steelhead Maximum Spawning Flows in the North and South Santiam Rivers.

ODFW understands that flows exceeding the maximum flow criteria for the North and South Santiam rivers occurred in late April and early May. ODFW would appreciate knowing the following:

1. Steelhead trout redds: steelhead trout, which are experiencing a very low run for the second year in a row, might have spawned in areas that will become dewatered or close to dewatered from now through July when flows are dropped to BiOp minima, leading to redd exposure and potentially contributing to further declines in the population. Before BiOp minima are reached on the North and South Santiam, ODFW requests that on-the-ground surveys verify that no winter steelhead redds are in danger of being dewatered at BiOp minima flow levels. If redds are identified that could be exposed by these lower flows, ODFW requests that USACE work with ODFW and NMFS to ensure that no redds experience dewatering until fry can be expected to have left the redd.
2. The reasons for the brief spike in flows and TDG that occurred on May 2nd, and a plan for avoiding such spikes in the future.

Additionally, including information related to ramping rates and the cause of the higher flows (e.g. higher than normal precipitation in April, etc.) as a part of this and future MFRs would be helpful in evaluating impacts.

Please let myself or Elise Kelley know if you have questions (Kelly.e.reis@state.or.us or elise.x.kelley@state.or.us). Thank-you for your consideration.

Sincerely,

Kelly Reis
Willamette Fish & Wildlife Policy & Program Manager

cc: Elise Kelley, Luke Whitman, Dave Jepsen, Bernadette Graham Hudson, ODFW
Michael Hudson, USFWS
Lawrence Schwabe, CTGR
Nancy Gramlich, ODEQ
Leslie Bach, NWPCC
Anne Mullan, Diana Dishman, NMFS