



Public Power Council

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December 2, 2013

Walla Walla District, Corps of Engineers
ATTN: PM-PD-PF, IAPMP Project Manager
201 North Third Avenue
Walla Walla, WA 99362-1876

Re: Public Power Council Comments on Draft Inland Avian Predation Management Plan (IAPMP) and Environmental Assessment

Dear IAPMP Project Manager:

Thank you for the opportunity to comment on the Draft Inland Avian Predation Management Plan and associated Environmental Assessment (EA). The Public Power Council (PPC) represents over 100 consumer-owned utility customers of the Bonneville Power Administration. As the primary customers of BPA, PPC members fund regional fish and wildlife mitigation efforts totaling approximately \$700 million annually and have a vested interest in ensuring these efforts are not inadvertently unwound by inaction or by a lack of addressing salmon mitigation holistically.

PPC appreciates the tremendous effort undertaken by the U.S. Army Corps of Engineers (Corps) to control animal populations that prey on juvenile salmonids in the Columbia River Basin, and we see that the regional investment for salmon and steelhead is working in many respects. While we are largely supportive of the Preferred Alternative in the IAPMP, we believe the Corps should take a more expeditious and aggressive line on avian predation.

The development of this plan is a requirement of Reasonable and Prudent Alternative Actions 47 and 68 of the NOAA-Fisheries 2008 Biological Opinion (BiOp) for the Federal Columbia River Power System (FCRPS), as updated in 2010. But, for five years since the 2008 BiOp release,

predation by piscivorous birds in the Columbia River Basin has annually increased to a point where they are now consuming almost 25 million juvenile salmonids each year. This is very alarming in light of the massive effort underway in all areas of the system to protect these fish.

The Final 2012 Annual Report prepared for the Army Corps of Engineers on Avian Predation on Salmonid Smolts in the Lower and Mid-Columbia River (Roby, et al., 2013) estimated that piscivorous birds consumed an estimated 23.8 million juvenile salmonids in the Columbus River Estuary in 2012. Of these predation values, 1 to 2 million juvenile salmonids are annually consumed in the Columbia Plateau Region which this plan addresses. A majority of these fish are from ESA-listed populations.

While nearly all other BiOp targets are being met, the Upper Columbia steelhead ESU is the only ESA-listed salmon or steelhead stock in the Columbia River Basin that is not currently improving. It is on this stock where the highest inland predation rates are being observed. It was estimated that about 730,000 juvenile salmonids were consumed by Caspian terns nesting in the Columbia Plateau Region and the predation rate was highest for upper Columbia River steelhead ESU (17.3%) (Roby, et al., 2013). Further, predation rates on Snake River steelhead ESU were estimated at 2.8% of the population and predation rates on upper Columbia River spring chinook estimated at 2.5%. In light of these facts, it is imperative that the Corps not hesitate to take quick and effective action that will reduce predation of these stocks.

The Corps' Preferred Alternative D focuses management efforts on Caspian terns nesting at Goose Island and Crescent Island and begins to address predation regarding those stocks of concern. Given the options currently being considered, PPC supports this Preferred Alternative. However, we urge the Corps to expand the scope of future actions to include other avian species found to be preying on significant portions of juvenile salmonid populations and to assert more aggressive management of Caspian terns.

We are also concerned that as proposed, Alternative D may result in Caspian terns dispersing to other nesting locations within the Columbia Plateau, thereby limiting the intended predation reduction. In the future, we believe the Corps should take action to reduce this risk.

PPC implores the Corps to expedite these already long delayed management actions. As noted above, the requirement to manage fish losses due to piscivorous birds was included in the 2008 FCRPS BiOp. Yet, it is only now in 2013 that a draft plan has been released and it is disappointing that it addresses only one of the many avian species preying on significant numbers of ESA-listed salmon and steelhead in the Columbia Plateau Region. Further delay would potentially result in the loss of millions more juvenile salmon and steelhead.

As evidenced by the latest adult salmon and steelhead returns, we have seen that regional efforts of the past two decades are generally working well. Avian predation, however, continues to jeopardize these gains. Of the alternatives under consideration, we support the expeditious implementation of Alternative D. However, we also urge the Corps to adopt an even more aggressive management regime than is being proposed in order to support the significant progress the region has made for the benefit of salmon throughout the Columbia River Basin.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bo Downen', with a long horizontal line extending to the right.

Bo Downen
Analyst

Literature Cited:

Roby, D.D., et al., 2013. Research, Monitoring, and Evaluation of Avian Predation on Salmonid Smolts in the Lower and Mid-Columbia River, Final 2012 Annual Report. Prepared for BPA, USACE – Portland District, and USACE – Walla Walla District.