

Craver, Patti

From: Krieg, Rebekah <rebekah.krieg@pnl.gov>
Sent: Friday, March 04, 2011 6:19 PM
To: Logan, Dennis
Cc: Mcdowell, Bruce K; Bunn, Amoret L
Subject: Status of the steelhead
Attachments: CGS NMFS response.pdf

Dennis – after working on the BA/EFH I realized that we have several potential errors in the Draft SEIS that we need to clarify and possibly change (see below). The confusion resulted after I read the letter we’d received from NMFS. The attached letter indicates that the steelhead is threatened. After reading it, I went changed the status of the steelhead in the SEIS, from “threatened” (as Amoret had written it) to “endangered”. But after researching this further for the BA/EFH I am convinced that Amoret was correct and that the Upper Columbia River steelhead is threatened, even though the letter states that the Upper Columbia River steelhead is listed as endangered. I mentioned this to Amoret last week and she thought there might be some confusion at the Portland NMFS office and that we should consider calling Rich Domingue and double checking. I would be happy to make that call or we could coordinate our schedules if that would work better.

To complete the story, this is the statement I put in the BA/EFH –

The Upper Columbia River steelhead was listed as an endangered species on August 18, 1997 (62 FR 43937). The status was upgraded to threatened on January 5, 2006 (71 FR 834), reinstated to endangered in June 2007 based on a district court ruling (*Trout Unlimited v. Lohn*, C06-0483-JCC, 2007), and then upgraded to threatened by U.S. District Court order in June 2009. The Upper Columbia River steelhead is currently listed as threatened (74 FR 42605) by the NMFS.

Please let me know how you would like me to proceed.
 Thanks!
 Becky

Recommended changes to the Draft SEIS
Page 2-40 and 2-41

Table 2.2-5. Listed Aquatic and Terrestrial Species

Scientific Name	Common Name	Federal Status ^(a)		State Status ^(b)		Habitat
Mammals						
<i>Brachylagus idahoensis</i>	pygmy rabbit	FE	SE	Columbia Basin DPS		
Birds						
<i>Centrocercus urophasianus</i>	greater sage grouse	FC	ST	Columbia Basin DPS		
<i>Coccyzus americanus</i>	yellow-billed cuckoo	FC	SC	Deciduous woodlands		
Plants						
<i>Spiranthes diluvialis</i>	Ute ladies'-tresses			FT	-	River floodplains
<i>Eriogonum codium</i>	Umtanum desert buckwheat			FC	-	Basalt cliffs
Fish						
<i>Oncorhynchus tshawytscha</i>	upper Columbia River spring Chinook salmon	FE	SC	Anadromous; spawn in small tributaries; migrate through major rivers		
<i>Oncorhynchus mykiss</i>	upper Columbia River steelhead	FT	SC	Anadromous; mainstem Columbia River		
<i>Salvelinus confluentus</i>	bull trout	FT	SC	Anadromous; rivers		

B.2

<i>Catostomus platyrhynchus</i>	mountain sucker	-	SC	Tributaries of the Columbia River
<i>Lampetra ayresii</i>	river lamprey	-	SC	Anadromous; spawn in small tributaries; migrate through major rivers
<i>Rhinichthys flacatus</i>	leopard dace	-	SC	Rivers
<i>Rhinichthys umatilla</i>	Umatilla dace		SC	Rivers
Mollusks				
<i>Anodonta californiensis</i>	California floater	-	SC	Shallow, muddy or sandy substrate in rivers
<i>Fluminicola columbiana</i>	great Columbia River spire snail (Columbia pebblesnail)	-	SC	River substrate
Sources: Poston, et al., 2009; Suzumoto, 2010; USFWS, 2010a; USFWS, 2010b; WDFW, 2010a.				
(a) Federal status listings: FE = Federally Endangered; FT = Federally Threatened; FC= Federal Candidate.				
(b) State of Washington status listings: SE = State Endangered; ST = State Threatened; SC = State Candidate.				
(c) DPS—Distinct Population Segment.				

Page 2-42

2.2.7.2 Federally and State-Listed Threatened and Endangered Aquatic Species

43 Table 2.2-5 presents aquatic species that are listed as protected by the USFWS, NMFS, and
44 the State of Washington and have the potential to occur in the counties near the CGS site.
45 Federally-listed species include the endangered upper Columbia River spring-run Chinook
46 salmon, the threatened upper Columbia River steelhead, and the threatened bull trout.

Page 2-44

34 *Upper Columbia River Steelhead*. The listing of the upper Columbia River steelhead has
35 changed a number of times since 1997, and NMFS presently lists the upper Columbia River
36 steelhead as threatened (August 24, 2009; 74 FR 42605). The listing is now defined as the
37 “Distinct Population Segment (DPS) including all naturally spawned anadromous steelhead
38 populations below natural and manmade impassable barriers in streams in the Columbia River
39 Basin, upstream from the Yakima River, WA, to the U.S.–Canada border” (74 FR 42605). The
40 steelhead associated with six artificial propagation programs are also part of the listing,
41 including the Wenatchee River, Wells Hatchery (in the Methow and Okanogan rivers), Winthrop
42 National Fish Hatchery, Omak Creek, and the Ringold steelhead hatchery programs (74 FR

Page 4-7

17 4.7.1 Aquatic Species

18 Section 2.2.7 of this SEIS describes the Federally listed, threatened, or endangered species
19 and critical habitats on or near the CGS site. The species include the threatened bull trout, the
20 threatened upper Columbia River steelhead, and the threatened upper Columbia River
21 spring-run Chinook salmon (Suzumoto, 2010), (USFWS, 2010). In addition, the Columbia River
22 near the CGS site is essential fish habitat (EFH) for upper Columbia River Chinook salmon
23 (spring-, summer-, and fall-runs) and coho salmon. Critical habitat for the threatened bull trout
24 includes the entire Columbia River Basin (75 FR 2269). The USFWS published, in its recent
25 ruling on bull trout, that the mainstem of the Columbia River is more important for providing
26 foraging, migration, and overwintering habitat than was previously understood. Bull trout have
27 been found in the Hanford Reach of the Columbia River (Gray and Dauble, 1977), but the
28 species is rarely found. Observations of the bull trout have usually been in association with the
29 spring freshet (Duncan, et al., 2007), leading some scientists to believe that the species is
30 transient near the CGS site (Dauble, 2009), (Poston, et al., 2009).

Rebekah Harty Krieg

Senior Research Scientist, Energy and Environment Directorate

Pacific Northwest National Laboratory

902 Battelle Boulevard

P.O. Box 999, MSIN K6-85

Richland, WA 99352 USA

Tel: 509-371-7155

Fax: 509-371-7160

rebekah.krieg@pnl.gov

www.pnl.gov



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
1201 NE Lloyd Boulevard, Suite 1100
PORTLAND, OREGON 97232-1274
June 23, 2010

Bo Pham
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, Maryland 20852.

Re: Columbia Generating Station license renewal, request for species list for consultation.

Dear Mr. Pham:

This letter responds to your May 3, 2010 request for a list of species to be considered in Endangered Species Act (ESA) and Magnuson-Stevens Fishery Conservation and Management Act (MSA) consultations on your proposed license renewal action for the Columbia Generating Station. This letter also clarifies how NOAA's National Marine Fisheries Service (NMFS) intends to manage this consultation.

The Columbia Generating Station is located along the Columbia River near Richland, Washington. Through the intake of water from the Columbia River for cooling and the discharge of waste water from the plant to the river, the project has the potential to affect anadromous fish that may occur in the vicinity of the plant's freshwater intake and wastewater release works. Species listed under the Endangered Species Act likely to occur in these areas are:

- Upper Columbia River (UCR) spring Chinook salmon (*O. tshawytscha*; listed as endangered on June 28, 2005 [70 FR 37160]); critical habitat designated on September 2, 2005 [70 FR 52630], and
- Upper Columbia River (UCR) steelhead (*O. mykiss*; listed as endangered on August 24, 2009 [74 FR 42605]); critical habitat designated on September 2, 2005 [70 FR 52630].

This letter constitutes the required notification that Federally-listed threatened or endangered species or critical habitat under NMFS jurisdiction are present within the area affected by this project and may be affected by the proposed action.

Please refer to Section 7 of the ESA and its implementing regulations (50 CFR Part 402) for information on interagency consultation. Additional information on listed species' distribution, copies of Federal Register documents designating listed species status, and links to various ESA consultation policies and tools may be found on our website at: www.nwr.noaa.gov.

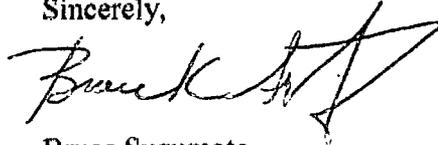
Concerning the MSA, the Columbia River, in the plant vicinity, provides essential fish habitat features for both Upper Columbia River Chinook and coho salmon (currently an unlisted reintroduction effort). Water withdrawal and wastewater disposal operations at the project have the potential to adversely affect essential fish habitat for these species. As the information



necessary to make the determinations required under ESA are sufficient to support any recommendations under the MSA, we generally conduct these analyses simultaneously using information developed during the ESA consultation. However, as Upper Columbia River coho are not listed under ESA, we request that you include them in any request for concurrence or consultation and assess the likely adverse effects of the project on their essential habitat to facilitate our MSA findings.

NMFS has determined that because the potential effects of the proposed action occur mostly or entirely within the Columbia River and our Hydro Division is most familiar with Columbia River issues, this project will be manned by our Hydro Division staff out of our Portland office. Please send all further correspondence regarding this action to the attention of Rich Domingue, (503) 231-6858 or Richard.Domingue@noaa.gov at this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Suzumoto", with a stylized flourish at the end.

Bruce Suzumoto
Assistant Regional Administrator
Hydropower Division