

From: Balsam, Briana
To: [Logan, Dennis](#)
Subject: Columbia final SEIS paragraphs for EFH and ESA consultations
Date: Tuesday, April 03, 2012 2:58:00 PM
Attachments: [Changes to Columbia SEIS to document EFH and ESA Consultations.docx](#)

Dennis,

I put this together for the Columbia final SEIS. I realized, though, that we should summarize the section 7 consultations with FWS and NMFS, also. I included paragraphs for these as well. Feel free to edit whatever you want and then pass them on to Jeremy.

Briana

Changes to Columbia SEIS to document completion of EFH Consultation

Section 2.2.7.3 Essential Fish Habitat, Page 2-50, lines 26-30:

In correspondence with the NRC, the NMFS noted upper Columbia River Chinook salmon (spring-, summer-, and fall-runs) and coho salmon as species that have EFH (Suzumoto, 2010). A separate EFH Assessment, which is enclosed as Appendix D-1 in this SEIS, that considers impacts to these species. A summary of EFH Consultation between the NRC and NMFS appears in Section 4.7.1, addresses additional consultation between the NMFS and the NRC concerning essential habitat near the CGS site.

Section 4.7.1 Aquatic Species, Page 4-10, insert after line 9:

EFH Consultation

The NRC prepared one document that contains both a biological assessment and an EFH Assessment (Appendix D-1 in this SEIS) to address the potential impacts to ESA-listed species and Federally managed species with designated EFH in the vicinity of CGS. In the EFH Assessment, the NRC considered upper Columbia River Chinook salmon (spring, summer, and fall runs) and coho salmon EFH. The NRC forwarded its draft SEIS containing the combined biological assessment and EFH Assessment to the NMFS by letter dated August 23, 2011 (NRC 2011a). The NRC requested that the NMFS respond in writing to the EFH Assessment within 30 days per the abbreviated EFH Consultation timing stipulations at 50 CFR 600.920(h)(4). The EFH regulations stipulate that Federal agencies must provide a detailed response in writing to NMFS within 30 days following the receipt of NMFS's EFH Conservation Recommendations (50 CFR 600.920(k)). To date, the NMFS has not supplied the NRC with EFH Conservation Recommendations in response to the staff's EFH Assessment. The NRC has completed its EFH Assessment and has made an effort to coordinate with the NMFS through several telephone conversations concerning the proposed CGS license renewal. At no point during this process has the NMFS has not indicated that it intends to formulate EFH Conservation Recommendations for CGS. Thus, the NRC considers EFH Consultation concluded.

Section 7 Consultation with FWS

FWS manages the recovery of the bull trout, one of the three species assessed in the biological assessment. The NRC forwarded its draft SEIS containing a combined biological assessment and EFH assessment (Appendix D-1 in this SEIS) to the FWS on August 23, 2011 (NRC 2011b). After phone discussions with the FWS regarding the biological assessment, the NRC revised its biological assessment conclusion of "no effect" to "may affect, but not likely to adversely affect" the bull trout in an email dated September 28, 2011 (NRC 2011c). The FWS concurred with this determination by letter dated October 5, 2011 (FWS 2011). This letter concluded informal consultation between the NRC and FWS.

Section 7 Consultation with NMFS

NMFS manages the recovery of the Upper Columbia River spring Chinook salmon and the Upper Columbia River steelhead. The NRC forwarded its draft SEIS containing a combined biological assessment and EFH assessment (Appendix D-1 in this SEIS) to the NMFS on August 23, 2011 (NRC 2011a). In that letter, the NRC requested concurrence with its biological assessment determinations per 50 CFR 402.12(j). The NMFS responded by letter dated October 24, 2011 (NMFS 2011). In that letter, the NMFS notified the NRC that it did not concur with the NRC's effect determinations and directed the NRC to initiate formal section 7 consultation. The NRC replied to the NMFS by letter dated December 20, 2011 (NRC 2011d). The NRC reiterated the fact that no available ecological studies indicate that CGS is entraining or impinging either of the two ESA-listed species and that the NRC believes that informal consultation is the appropriate means of fulfilling NRC's obligations under the ESA for the proposed CGS license renewal. Following the NMFS's receipt of this letter, the NRC and NMFS discussed the biological assessment over several telephone conversations and agreed that informal consultation is the appropriate path forward. The NMFS requested additional information from the NRC on February 10, 2012 (NMFS 2012) to assist NMFS staff in reaching a conclusion for the Upper Columbia River spring Chinook salmon and the Upper Columbia River steelhead. The NRC is in the process of compiling the requested information. At this time, informal consultation with NMFS is ongoing.

Additional Chapter4 References:

FWS (U.S. Fish and Wildlife Service). 2011. Letter from K.S. Berg, Manager, Central Washington Field Office, FWS, to D. Wrona, RPB1 Chief, NRC. Subject: Concurrence on biological assessment for proposed Columbia Generating Station license renewal. October 5, 2011. ADAMS No. ML11291A157.

NMFS (National Marine Fisheries Service). 2011. Letter from W.W. Stelle, Northwest Regional Administrator, NMFS to D. Wrona, RBP2 Chief, NRC. Subject: Letter of non-concurrence on NRC's proposed license renewal for Energy Northwest's Columbia Generating Station. October 24, 2011. ADAMS No. ML11307A393.

NMFS (National Marine Fisheries Service). 2012. E-mail from R. Domingue, Hydropower Division, NMFS, to D. Doyle, Project Manager, NRC. Subject: Columbia Generating Station additional information request. February 10, 2012. ADAMS No. ML12044A329.

NRC (U.S. Nuclear Regulatory Commission). 2011a. Letter from D. Wrona, RPB2 Chief, NRC, to R. Domingue, Hydropower Division, NMFS. Subject: Biological Assessment for informal section 7 consultation and request to initiate abbreviated EFH Consultation for license renewal of Columbia Generating Station. August 23, 2011. ADAMS No. ML11165A030.

NRC (U.S. Nuclear Regulatory Commission). 2011b. Letter from D. Wrona, RPB2 Chief, NRC, to R. Thorson, Pacific Regional Director, FWS. Subject: Biological Assessment for informal

section 7 consultation related to the license renewal of Columbia Generating Station. August 23, 2011. ADAMS No. ML11161A002.

NRC (U.S. Nuclear Regulatory Commission). 2011c. E-mail from D. Logan, Ecologist, NRC, to L. Gauthier, FWS. Subject: Revised biological assessment conclusion for bull trout in Columbia Generating Station section 7 consultation with FWS. September 29, 2011. ADAMS No. ML11272A066.

NRC (U.S. Nuclear Regulatory Commission). 2011d. Letter from D. Wrona, RBP2 Chief, NRC, to W.W. Stelle, Northwest Regional Administrator, NMFS. Subject: Response to letter of non-concurrence on biological assessment for proposed license renewal of Columbia Generating Station. December 20, 2011. ADAMS No. ML11335A127