



Public Utility District No. 1 of Douglas County

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Via Electronic Filing

April 30, 2013

Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 1st Street N.E.
Washington, D.C. 20426

**Subject: Wells Hydroelectric Project – FERC Project No. 2149
Updated Aquatic Nuisance Species Management Plan – Article 405**

Dear Secretary Bose:

Public Utility District No. 1 of Douglas County, Washington (Douglas PUD), licensee for the Wells Hydroelectric Project No. 2149 (Wells Project) respectfully submits for approval an updated version of the Aquatic Nuisance Species Management Plan (2013 ANSMP) that reflects the changes required by Article 405 of the new FERC license for the Wells Project.

Article 405 of the license requires Douglas PUD to file with the FERC for approval, within six months of license issuance (April 30, 2013), an updated version of the ANSMP. Article 405 requires Douglas PUD to modify sections 4.1 and 4.2.1 of the ANSMP to include specific best management practices (BMPs). Section 4.1 must be revised to include requirements to prevent the spread of aquatic nuisance species during construction of recreation enhancement measures. Section 4.2.1 must be enhanced to specify reasonable and appropriate measures that are consistent with the aquatic nuisance species management protocols and will be implemented, if aquatic nuisance species are detected during monitoring activities at the project. Article 405 further requires that the ANSMP be updated in consultation with the agencies and tribes currently involved in the implementation of the Aquatic Settlement Agreement (ASA), in addition to requiring consultation with the National Marine Fisheries Service (NMFS) and the Bureau of Indian Affairs (BIA).¹

Toward compliance with Article 405, Douglas PUD has updated the 2008 ANSMP to include specific BMPs within Sections 4.1 and 4.2.1. The 2013 ANSMP is enclosed as Appendix A to this letter and was provided to the parties of the ASA and the BIA on February 15, 2013. On April 10, 2013, following a 56-day comment period, the parties to the ASA approved the 2013 ANSMP. On April 10, 2013, Douglas PUD provided the NMFS with a copy of the ASA approved 2013 ANSMP. On April 17, 2013, the NMFS responded that they approved of the new language incorporated into the 2013 ANSMP to address the requirements contained within license Article 405. The pre-filing consultation records supporting the review and approval of the 2013 ANSMP can be found in Appendix B.

¹ The parties to the ASA include the United States Fish and Wildlife Service, U.S. Bureau of Land Management, Washington State Department of Ecology, Washington State Department of Fish and Wildlife, the Confederated Tribes of the Colville Reservation and the Confederated Tribes and Bands of the Yakama Nation. The BIA was also provided an opportunity to review and comment on the 2013 ANSMP during the ASA comment period. The BIA is currently a non-voting observer within the ASA process.

If you have any questions or require further information related to the 2013 ANSMP, please feel free to contact Mr. Chas Kyger (509) 881-2388 or chask@dcpud.org.

Sincerely,



Shane Bickford
Natural Resources Supervisor

Enclosures:

- (1) Appendix A – Wells Project Aquatic Nuisance Species Management Plan - 2013
- (2) Appendix B – Pre-filing consultation record for the Wells Project Aquatic Nuisance Species Management Plan - 2013

Cc: T.J. LoVullo – FERC, Washington, D.C.
Douglas Johnson – FERC, Portland
Erich Gaedeke – FERC, Portland
Aquatic Settlement Work Group
Bryan Nordlund – NMFS, Lacey
Chas Kyger – Douglas PUD
Andrew Gingerich – Douglas PUD

APPENDIX A

WELLS PROJECT AQUATIC NUISANCE SPECIES MANAGEMENT PLAN – 2013

AQUATIC NUISANCE SPECIES MANAGEMENT PLAN
WELLS HYDROELECTRIC PROJECT
FERC PROJECT NO. 2149

April 2013

Prepared by:
Public Utility District No. 1 of Douglas County
East Wenatchee, Washington

EXECUTIVE SUMMARY

The Aquatic Nuisance Species Management Plan (ANSMP) is one of six Aquatic Resource Management Plans contained within the Aquatic Settlement Agreement (Agreement). Collectively, these six Aquatic Resource Management Plans are critical to direct implementation of Protection, Mitigation, and Enhancement measures (PMEs) during the term of the new license and, together with the Wells Anadromous Fish Agreement and Habitat Conservation Plan (HCP) will function as the Water Quality Attainment Plan (WQAP) in support of the Clean Water Act Section 401 Water Quality Certification for the Wells Hydroelectric Project (Project).

To ensure active stakeholder participation and support, the Public Utility District No. 1 of Douglas County (Douglas) developed all of the resource management plans in close coordination with agency and tribal natural resource managers (Aquatic Settlement Work Group or Aquatic SWG). During the development of this plan, the Aquatic SWG focused on developing management priorities for resources potentially impacted by Project operations. Members of the Aquatic SWG include the U.S. Fish and Wildlife Service (USFWS), Washington Department of Ecology (Ecology), Washington State Department of Fish and Wildlife (WDFW), the Confederated Tribes of the Colville Reservation (Colville), the Confederated Tribes and Bands of the Yakama Indian Nation (Yakama), and Douglas.

The National Marine Fisheries Service (NMFS) was invited to participate in the development of Aquatic Resource Management Plans, but declined because its interests are currently satisfied by the measures within the HCP.

The goal of the ANSMP is to prevent the introduction and/or spread of aquatic nuisance species in Project waters. Douglas, in collaboration with the Aquatic SWG, has agreed to implement several PMEs in support of the ANSMP. The PMEs presented within the ANSMP are designed to meet the following objectives:

Objective 1: Implement best management practices to prevent Eurasian watermilfoil (*Myriophyllum spicatum*) proliferation during in-water (i.e., construction, maintenance, and recreation improvements) improvement activities in the Project.

Objective 2: Continue participation in regional and state efforts to prevent the introduction and spread of aquatic nuisance species. Activities include continued monitoring for the presence of ANS, monitoring bycatch data collected during other aquatic management plan activities, and conducting education outreach within the Project.

Objective 3: In response to proposed changes in the Project requiring FERC approval, the Aquatic SWG will assess the potential effects, if any, with respect to the introduction or proliferation of aquatic nuisance species in the Project to inform management decisions to support success of the ANSMP and will implement reasonable and appropriate measures to address any potential effects.

This ANSMP is intended to be compatible with other aquatic nuisance species management plans in the Columbia River mainstem. Furthermore, this management plan is intended to be

supportive of the HCP, Bull Trout Management Plan, Pacific Lamprey Management Plan, Resident Fish Management Plan, White Sturgeon Management Plan, and Water Quality Management Plan by continuing to prevent the introduction and/or spread of aquatic nuisance species in Project waters. The ANSMP is intended to be not inconsistent with other management strategies of federal, state and tribal natural resource management agencies.

1.0 INTRODUCTION

The Aquatic Nuisance Species Management Plan (ANSMP) is one of six Aquatic Resource Management Plans contained within the Aquatic Settlement Agreement (Agreement). Collectively, these six Aquatic Resource Management Plans are critical to direct implementation of Protection, Mitigation, and Enhancement measures (PMEs) during the term of the new license and, together with the Wells Anadromous Fish agreement and Habitat Conservation Plan (HCP), will function as the Water Quality Attainment Plan (WQAP) in support of the Clean Water Act Section 401 Water Quality Certification for the Wells Hydroelectric Project (Project).

To ensure active stakeholder participation and support, the Public Utility District No. 1 of Douglas County (Douglas) developed all of the resource management plans in close coordination with agency and tribal natural resource managers (Aquatic Settlement Work Group or Aquatic SWG). During the development of this plan, the Aquatic SWG focused on developing management priorities for resources potentially impacted by Project operations. Entities invited to participate in the Aquatic SWG include the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), Washington Department of Ecology (Ecology), Washington State Department of Fish and Wildlife (WDFW), the Confederated Tribes of the Colville Reservation (Colville), the Confederated Tribes and Bands of the Yakama Indian Nation (Yakama), and Douglas.

The ANSMP will direct implementation of measures to prevent the introduction and/or spread of aquatic nuisance species in Project waters. To ensure active stakeholder participation and support, Douglas developed this plan, along with the other aquatic management plans, in close coordination with the members of the Aquatic SWG.

The Aquatic SWG agrees on the need to develop a plan for the long-term management and prevention of aquatic nuisance species in the Project. This management plan summarizes the relevant resource issues and background (Section 2), identifies goals and objectives of the plan (Section 3), and describes the relevant PMEs (Section 4) for aquatic nuisance species during the term of the new license.

2.0 BACKGROUND

Nonnative aquatic species may be released or “introduced” into an aquatic environment intentionally or unintentionally. Most often, such species are unable to adapt to their new environments and do not form self-sustaining populations (ANSC 2001). However, if such a species is able to adapt, become established, and thrive, it has the potential to threaten the diversity or abundance of native species and aquatic habitats and may even affect economic resources and human health. Such species are considered aquatic nuisance species or ANS (ANSC 2001).

RCW 77.60.130 defines the term aquatic nuisance species as a “nonnative aquatic plant or animal species that threatens the diversity or abundance of native species, the ecological stability of infested waters, or commercial, agricultural, or recreational activities dependent on such

waters” (RCW 2007). Since few natural controls exist in their new habitat, ANS may spread rapidly, damaging recreational opportunities, lowering property values, clogging waterways, impacting irrigation and power generation, destroying native plant and animal habitat, and sometimes destroying or endangering native species (ANSC 2001).

2.1 Aquatic Nuisance Species of Concern

2.1.1 Eurasian Watermilfoil (*Myriophyllum spicatum*)

Eurasian watermilfoil (EWM) is an aquatic plant native to Europe, Asia, northern Africa, and Greenland. It was once commonly sold as an aquarium plant (Ecology 2007). EWM may have been introduced to the North American continent at Chesapeake Bay in the 1880's, although evidence shows that the first collection was made from a pond in the District of Columbia during the fall of 1942. By 1985, EWM had been found in 33 states, the District of Columbia, and the Canadian provinces of British Columbia, Ontario, and Quebec (Ecology 2007). The first documented occurrence of EWM in the State of Washington was in 1965. The source of introduction was most likely from sources in Canada and despite an effort to stop its spread, EWM infestations in Lake Osoyoos, British Columbia spread down through the Okanogan Lakes and into the Okanogan River and the Columbia River in 1974 (Duke 2001).

EWM is extremely adaptable with the ability to thrive in a variety of environmental conditions. It grows in still to flowing waters, can tolerate salinities of up to 15 parts per thousand, grows rooted in water depths from 1 to 10 meters, and can survive under ice (Ecology 2007). Relative to other submersed plants, EWM requires high light, has a high photosynthetic rate, and can grow over a broad temperature range (Ecology 2007). EWM exhibits an annual pattern of growth. In the spring, shoots begin to grow rapidly as water temperatures approach 15 degrees centigrade. When they near the surface, shoots branch profusely, forming a dense canopy (Ecology 2007). Typically, plants flower upon reaching the surface and die back to the root crowns, which sprout again in the spring.

Although EWM can potentially spread by both sexual and vegetative means, vegetative spread is considered the major method of reproduction. During the growing season, the plant undergoes autofragmentation. The plant fragments often develop roots at the nodes before separation from the parent plants. Fragments are also produced by wind and wave action, control harvest activity and boating activities, with each plant fragment having the potential to develop into a new plant (Ecology 2007).

EWM is classified as a class B noxious weed by the Washington State Noxious Weed Control Board (WNWCB 2007). Class B noxious weeds are nonnative plants whose distribution is limited to portions of Washington State. Additionally, EWM has been identified as a nuisance species in the Washington State Aquatic Nuisance Species Management Plan (ANSC 2001). EWM can adversely impact aquatic ecosystems by forming dense canopies that often shade out native vegetation. Monospecific stands of EWM affect aquatic habitat, water quality, can impact power generation and irrigation, and interfere with recreational activities. In Washington, private and government sources spend about \$1,000,000 per year on EWM control (Ecology 2007).

2.1.2 Zebra Mussel (*Dreissena polymorpha*) and Quagga Mussel (*Dreissena rostriformis bugensis*)

Zebra and quagga mussels are freshwater, bivalve mollusks that typically have a dark and white (zebra-like) pattern on their shells. They are native to Eurasia and were both introduced into the Great Lakes as a result of ballast water discharge from transoceanic ships that were carrying veligers, juveniles, or adult mussels (USGS 2007). Zebra mussels first invaded North America in the mid-1980s and quagga mussels invaded a few years later in 1989 (USFWS 2007). These two species are closely related with subtle morphological differences. More research is needed on North American quagga mussels to assess ecological differences between the two species, but the practical implications of both species are essentially identical (USFWS 2007). The North American distribution of these species has been concentrated in the Great Lakes region of the U.S. with the zebra mussel distribution also spanning farther into the southern U.S. (Figure 2.1-1). Despite recent measures to prevent their westward expansion, quagga mussels were discovered in the Lake Mead Recreation Area. Populations have subsequently been found throughout the Boulder Basin of Lake Mead (Figure 2.1-1) and in more than a dozen reservoirs serving Southern California (Pam Meacham, pers. comm.).

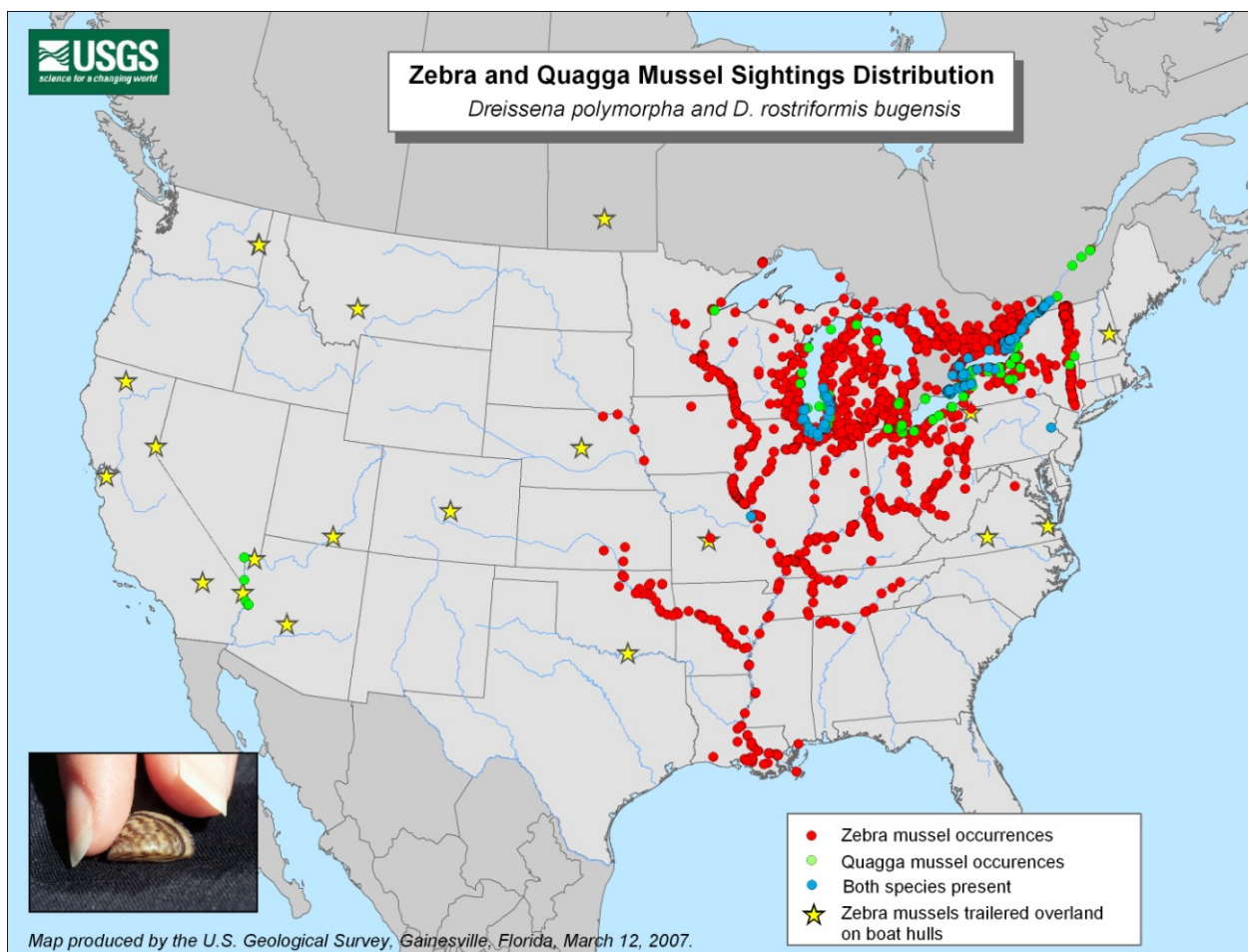


Figure 2.1-1 Zebra and Quagga Mussel Sightings Distribution Map (USGS 2007).

Zebra and quagga mussel size varies from microscopic to two inches long. Typical lifespan is up to 5 years. Both species may spawn year around if conditions are favorable. Peak spawning typically occurs in spring and fall. *Dreissena* are dioecious (either male or female) with external fertilization. Both species are prolific reproducers. Fecundity is high with a few individuals having the capability of producing millions of eggs and sperm (USFWS 2007). After fertilization, pelagic microscopic larvae, or veligers, develop within a few days and these veligers soon acquire minute bivalve shells. Free-swimming veligers drift with currents for three to four weeks until suitable substrate for settling is located. Adults attach to hard surfaces via byssal threads, but can detach and move to new habitat. Both species can tolerate a wide range of water temperatures (1-30°C), low velocities (<2 m/sec), and prefer hard surfaces for attachment although quagga mussels can live in soft sediments (USFWS 2007). Zebra mussels are typically found just below the surface to about 12 meters and quagga mussels are typically found at any depth where oxygen is available (USFWS 2007).

Zebra mussels have caused major ecological and economic problems since their arrival in North America, and quagga mussels pose many of the same threats. Both species are prolific filter feeders, removing substantial amounts of phytoplankton and suspended particulate from the water thus impacting aquatic ecosystems by potentially altering food webs (USGS 2007). *Dreissena*'s ability to rapidly colonize hard surfaces causes serious economic problems. These major bio-fouling organisms can clog water intake structures such as pipes and screens, therefore reducing capabilities for power and water treatment plants. Recreation-based industries and activities have also been heavily impacted; docks, breakwalls, buoys, boats, and beaches have all been heavily colonized (USGS 2007). Zebra mussel densities have been reported to be over 700,000 individuals per square meter in some facilities in the Great Lakes area. Each year, the economic impact to the U.S. and Canada is approximately \$140 million in damage and control costs (Sea Grant 2007).

2.2 Project Information

Past aquatic studies contributing information to aquatic nuisance species of concern, discussed above, consisted of an aquatic macrophyte species composition and mapping survey (Lê and Kreiter 2005) and a macroinvertebrate assessment and rare, threatened, and endangered (RTE) species survey (Bioanalysts 2006). Results of these studies and other Project aquatic studies indicate that the aquatic ecosystem within the Project is composed of a diverse community of flora and fauna consisting of varied aquatic taxa such as plankton, macroinvertebrates (insects, snails and bivalves), fish, and plants. Although nonnative species are present within Project waters, the aquatic community is characterized by a native species dominated assemblage. It is important to note the varying degree to which a nonnative species can be characterized as a “nuisance” species. The many factors that determine a nonnative species’ magnitude of infestation and impact are complex and not always well understood.

2.2.1 Aquatic Macrophytes

Some information exists on aquatic macrophyte communities in the mid-Columbia River system. Vegetation mapping in and around the Rocky Reach Reservoir (River Miles (RM) 473.6 to 515.5) identified 979 acres of aquatic macrophytes (Duke 2001) out of a total surface area of 8,167 acres (Duke 2001). Nonnative EWM represented 34 percent of the biomass samples

collected from within the Rocky Reach Reservoir (Duke 2001). In the Priest Rapids and Wanapum reservoirs, the composition of EWM in the aquatic macrophyte community was higher at 42 percent of littoral plant biomass (Normandeau et al. 2000).

In August and September 2005, Douglas conducted an aquatic macrophyte study in the Wells Reservoir. Sixty-one transects totaling 369 sample points were completed during the 2005 study (Lê and Kreiter 2005). Depths of up to 30 feet were sampled and sampling points along transects were completed at intervals of 5 feet or less. A total of nine aquatic plant species were documented (Table 2.2-1). Table 2.2-1 presents the percentage of samples in which each of the identified aquatic species was categorized as the dominant species (consisting of >60 percent of the sample composition). The two most dominant species in samples collected were common waterweed (*Elodea canadensis*) and leafy pondweed (*Potamogeton foliosus*) at 24.7 percent and 16.7 percent, respectively. Both of these species are native. EWM was dominant in only 6.3 percent of samples (Table 2.2-1). Samples with no plants (absent) consisted of 41.7 percent of all samples taken. This observation supports the concept that macrophyte communities maintain a patchy distribution.

Table 2.2-1 Aquatic macrophyte species identified and the frequency at which each of the species was considered the dominant species (consisting of >60 percent of the total sample) in a given sample during the Macrophyte Identification and Distribution Study, 2005 (Lê and Kreiter 2005).

Scientific Name	Common Name	Percentage of samples in which dominant
<i>Chara spp.</i>	Muskgrass	.003% (1/396)
<i>Elodea canadensis</i>	Common waterweed	24.7% (98/396)
<i>Myriophyllum spicatum</i>	Eurasian watermilfoil	6.3% (25/396)
<i>Potamogeton crispus</i>	Curly leaf pondweed	4.3% (17/396)
<i>Potamogeton foliosus</i>	Leafy pondweed	16.7% (66/396)
<i>Potamogeton nodosus</i>	American pondweed	1.3% (5/396)
<i>Potamogeton pectinatus</i>	Sago pondweed	0.8% (3/396)
<i>Potamogeton zosteriformis</i>	Flat-stemmed or eelgrass pondweed	2.3% (9/396)
Absent		41.7% (165/396)

Although EWM is present in the Project, the 2005 study indicated that it is not a dominant component of the Project aquatic plant community. During the Project study, EWM was often sub-dominant to several native species in samples collected. These contrasting observations between the Wells Reservoir and downstream reservoirs (Rocky Reach, Priest Rapids, and

Wanapum) where EWM was found to be the most abundant species are not clearly understood. One possible explanation may be that EWM, which is a species that can proliferate from plant fragments (Ecology 2001), has increased its ability to colonize due to potentially higher levels of disturbance in the downstream reservoirs as compared to the Wells Reservoir. The Rocky Reach Reservoir serves a larger population base, maintains an EWM removal program at recreational sites, and has higher levels of recreational use and development as compared to the Wells Reservoir. It is possible that these activities directly and indirectly re-mobilize EWM plant fragments and increase the potential for colonization in the Rocky Reach Reservoir as well as in downstream reservoirs (Lê and Kreiter 2005).

2.2.2 Aquatic Macroinvertebrates

In September and October 2005, Douglas conducted an aquatic invertebrate inventory and an assessment of the presence of rare, threatened, and endangered (RTE) aquatic invertebrates within the Wells Reservoir. The overall objective of the study was to document the distribution, habitat associations and qualitative abundance of the current aquatic invertebrate (e.g., clams, snails and insects) assemblage in the Wells Reservoir.

Samples were collected within representative habitats throughout the Wells Reservoir using an air lift suction device, Ponar grabs and colonization baskets. A total of 17 sites were sampled. In addition to the varied aquatic insects and worms found during the survey, approximately 20 species of freshwater mollusks were identified during the inventory from dredge samples (Table 2.3-1). Within the Methow, Okanogan and Columbia portions of the Wells Reservoir, 13, 11, and nine species of mollusks were present, respectively. Of the 20 species, 10 gastropods (snails) and 10 bivalves (clams, mussels) were identified. The gastropods included nine native species and one nonnative species (Big-ear radix, *Radix auricularia*). Similarly, the bivalves also included nine native species and one nonnative species (Asian clam, *Corbicula fluminea*) (BioAnalysts, Inc. 2006). The 2005 macroinvertebrate assessment did not discover the presence of any zebra mussels or quagga mussels within the Project.

2.2.3 Project Aquatic Nuisance Species Monitoring

In 2006, Douglas, in coordination with the Aquatic Nuisance Species Division of WDFW, began monitoring for zebra mussels and quagga mussels in Project waters. Activities consisted of monthly plankton tows to target mussel veligers at sites downstream of boat launches within the Wells Reservoir. Sampling activities were conducted during the summer and early fall when recreational boating activity is at a peak. Sampling protocols were provided by WDFW. All samples were sent back to WDFW for analysis. To date, none of the samples collected within the Project have contained any signs of zebra or quagga mussel presence.

In 2007, Douglas, in coordination with the Center for Lakes and Reservoirs at Portland State University, installed a permanent substrate sampler in the Wells Dam forebay to monitor for zebra and quagga mussel colonization within the Project. Douglas staff checks the substrate sampler monthly throughout the year as specified by the monitoring protocol. To date, no signs of zebra or quagga mussel presence have been detected. Both of these monitoring activities are ongoing.

Table 2.3-1 Mollusks collected from sampling stations on the Methow, Okanogan, and Columbia rivers during the 2005 Project Aquatic Macroinvertebrate Inventory.

Location	Common Name	Taxon
Methow River	Western pearlshell	<i>Margaritinopsis falcata</i>
	Striate fingernail clam	<i>Sphaerium striatinum</i>
	Ridgebeak peaclam	<i>Pisidium compressum</i>
	Western lake fingernail clam	<i>Musculium raymondi</i>
	Shortface lanx	<i>Fisherola nuttalli</i>
	Ashy pebblesnail	<i>Fluminicola fuscus</i>
	Western floater	<i>Anodonta kennerlyi</i>
	Ubiquitous peaclam	<i>Pisidium casertanum</i>
	Big-ear radix*	<i>Radix auricularia</i>
	Golden fossaria	<i>Fossaria obrussa</i>
	Prairie fossaria	<i>Fossaria (Bakerilymnaea) bulimoides</i>
	Ash gyro	<i>Gyraulus parvus</i>
		<i>Corbicula sp.</i>
Okanogan River	Western ridgemussel	<i>Gonidea angulata</i>
	Striate fingernail clam	<i>Sphaerium striatinum</i>
	Ridgebeak peaclam	<i>Pisidium compressum</i>
	Ubiquitous peaclam	<i>Pisidium casertanum</i>
	Asian clam*	<i>Corbicula fluminea</i>
	Ashy pebblesnail	<i>Fluminicola fuscus</i>
	Fragile ancyliid	<i>Ferrissia californica</i>
	Ash gyro	<i>Gyraulus parvus</i>
	Western lake fingernail clam	<i>Musculium raymondi</i>
Columbia River		<i>Physella sp.</i>
		<i>Anodonta sp.</i>
	Western floater	<i>Anodonta kennnerlyi</i>
	Asian clam*	<i>Corbicula fluminea</i>
	Ridgebeak peaclam	<i>Pisidium compressum</i>
	Three ridge valvata	<i>Valvata tricarinata</i>
	Rocky Mountain physa	<i>Physella propinqua propinqua</i>
	Ash gyro	<i>Gyraulus parvus</i>
	Golden fossaria	<i>Fossaria (F.) obrussa</i>
	Prairie fossaria	<i>Fossaria (Bakerilymnaea) bulimoides</i>
	Big-ear radix*	<i>Radix auricularia</i>

*Nonnative taxon.

3.0 GOAL AND OBJECTIVES

The goal of the ANSMP is to prevent the introduction and/or spread of aquatic nuisance species in Project waters. Douglas, in collaboration with the Aquatic SWG, has agreed to implement several PME's in support of the ANSMP. The PME's presented within the ANSMP are designed to meet the following objectives:

Objective 1: Implement best management practices to prevent Eurasian watermilfoil proliferation during in-water (i.e., construction, maintenance and recreation improvements) improvement activities in the Project.

Objective 2: Continue participation in regional and state efforts to prevent the introduction and spread of aquatic nuisance species. Activities include continued monitoring for the presence of ANS, monitoring bycatch data collected during other aquatic management plan activities and conducting education outreach within the Project.

Objective 3: In response to proposed changes in the Project requiring FERC approval, the Aquatic SWG will assess the potential effects, if any, with respect to the introduction or proliferation of aquatic nuisance species in the Project to inform management decisions to support success of the ANSMP and will implement reasonable and appropriate measures to address any potential effects.

The ANSMP is intended to be compatible with other aquatic nuisance species management plans in the Columbia River mainstem. Furthermore, this management plan is intended to be supportive of the HCP, Bull Trout Management Plan, Pacific Lamprey Management Plan, Resident Fish Management Plan, White Sturgeon Management Plan, and Water Quality Management Plan by continuing to prevent the introduction and/or spread of aquatic nuisance species in Project waters. The ANSMP is intended to be not inconsistent with other management strategies of federal, state, and tribal natural resource management agencies.

The schedule for implementation of specific measures within the ANSMP is based on the best information available at the time the Plan was developed. As new information becomes available, implementation of each activity may be adjusted through consultation with the Aquatic SWG.

4.0 PROTECTION, MITIGATION AND ENHANCEMENT MEASURES

In order to fulfill the goals and objectives described in Section 3.0, Douglas, in consultation with the Aquatic SWG, has agreed to implement the following PME's.

4.1 Implement Best Management Practices During Recreational Improvement Activities (Objective 1)

If at any time during the new license term, Douglas is required to construct, improve or maintain recreation access at boat launches and swim areas and the removal or disturbance of aquatic macrophyte beds that contain Eurasian watermilfoil may potentially occur, Douglas will implement containment efforts utilizing best management practices agreed to by the Aquatic SWG during such activities.

Douglas will implement the following best management practices (BMPs) to prevent the spread of ANS during contracted construction or maintenance of recreation enhancement measures:

For any contracted construction and maintenance activities requiring in-water work, Douglas will require, as part of construction bids, the inclusion of BMPs to address potential ANS threats. Prior to contract award, Douglas contract management staff will review and approve the sufficiency of proposed ANS BMPs with contractors and if necessary, require modifications in proposed ANS BMP implementation scope. Contractors will be instructed to share information with all sub-contractors prior to the start of work.

All equipment will undergo thorough inspection prior to entry into the Project to prohibit the introduction of ANS.

Inspections will be carried out on construction equipment and watercraft at a staging area dedicated to equipment and watercraft cleaning. This site will be located away from the ordinary high water line and away from any storm drains that run into Project waters. Douglas will provide adequate training and information on ANS inspection and cleaning procedures to personnel responsible for inspections at field sites. An inspection process for vehicles and equipment that arrive onsite from other areas will be provided. Equipment from rental agencies, outside contractors, and managing partners will also be subject to inspection and cleaning. Pre-cleaning inspections will be used to identify problem areas and determine whether hand removal of large accumulations of soil and debris is necessary before washing of equipment. Douglas will provide equipment necessary for conducting proper inspections.

Douglas will provide adequate training and information on ANS cleaning procedures to personnel responsible for cleaning watercraft and equipment. Specific information on cleaning of in-water equipment and watercraft will be provided. Special cleaning and decontamination protocols and methods will be required for equipment and watercraft that has been previously used in areas where zebra mussels and other Dreissendid species are present.

Douglas will require that records of inspections and cleanings be provided for all watercraft and construction equipment used in or near project waters prior to, and after completion of construction projects. Inspection and cleaning records will include the location and date the watercraft or equipment was last used, date of inspection, findings of inspections, and the date and method used during the last cleaning. Inspection and cleaning records will be used to ensure that all watercraft and equipment has undergone proper inspection and cleaning before use in project waters.

4.2 Participation in Regional and State ANS Efforts (Objective 2)

4.2.1 Coordination with Regional and State Entities

Douglas shall continue to coordinate with regional and state entities to implement activities in Project waters to monitor for the presence of ANS, specifically zebra and quagga mussels. Activities covered by this objective will consist of monitoring for the presence of zebra and quagga mussels as is identified in Section 2.2.3. If ANS are detected during monitoring activities, Douglas will immediately notify the appropriate regional and state agencies and assist in the implementation of reasonable and appropriate measures to address the ANS presence as is consistent with ANS Management protocols.

In the event of positive identification of new ANS within the Project area, Douglas will conduct the following response activities:

- Douglas will immediately notify Ecology and WDFW of positive or suspected ANS species identified during monitoring and/or boat inspections. Photographs will be taken and sent to Ecology or WDFW for assistance in identification. If necessary, samples may also be collected for positive identification.
- Once the presence of ANS has been positively determined, Douglas will within 30 days of the positive identification (requiring confirmation by relevant agencies), begin monitoring at multiple sites throughout the Project to determine the extent and distribution of the new ANS within the Project. Monitoring methods will vary depending on species and will be developed in consultation with the Aquatic SWG.
- If zebra mussels or other Dreissenid species are discovered in Project waters, Douglas will also notify upstream and downstream operators (Corps and Chelan PUD) and the Columbia River Basin Team. Douglas will help coordinate subsequent Columbia River Basin Team rapid response actions as applicable to the Project, such as implementing mandatory boat inspections, boat launch closures, quarantines, treatments, etc., in consultation with the Aquatic SWG.
- Douglas will work collaboratively with Ecology and WDFW, and in consultation with the Aquatic SWG, to develop an appropriate control response. Douglas will cooperate with the Columbia River Basin Team in implementing rapid response actions. It is anticipated that the Columbia River Basin Team will use up to the date technical information to guide decisions. The Columbia River Basin Team is also expected to follow the protocols contained within the 100th Meridian Initiative (Heimowitz and Phillips 2011) as it applies to the containment of zebra and other Dreissenid species.
- Appropriate information will also be provided to the public about any new ANS observations. Up-to-date outreach will be provided the public with information about the presence and distribution of the ANS in Project waters, and on the appropriate measures being implemented to prevent the proliferation of the species.
- After initial response efforts are conducted, Douglas will assist the Columbia River Basin Team in implementing control and/or eradication actions as appropriate based on the location, extent,

and type of ANS identified. The Aquatic SWG will be consulted when selecting control and eradication methods.

Douglas shall participate in information exchanges and regional efforts to coordinate monitoring activities.

4.2.2 Monitor Bycatch from other Project Aquatic Resource Management Activities

Douglas shall monitor bycatch data collected from ongoing Project aquatic resource management activities for aquatic nuisance species presence to support regional and state efforts and the ANSMP. Such ongoing activities may consist of broodstock collection activities at Wells Dam and in associated Project tributaries, the northern pikeminnow removal program, water quality monitoring and any other aquatic resource activities related to implementation of Aquatic Resource Management Plans for bull trout, Pacific lamprey, white sturgeon, and resident fish.

4.2.3 ANS Information and Education

Douglas shall make information regarding the effects of ANS introductions and the importance of prevention available to the public. Such outreach activities may consist of posting signage at Project recreation areas and boat launches.

Douglas shall also provide literature produced by appropriate state entities (Ecology and WDFW) for distribution at the visitor centers of local communities of the Project (Pateros, Brewster, Bridgeport) including Wells Dam.

4.3 Monitor and Address ANS Effects to Aquatic Communities During Changes in Project Operations (Objective 3)

If at any time during the new license term, future changes in Project operations requiring FERC approval are proposed and the Aquatic SWG concludes that such proposed operations may encourage the introduction or proliferation of aquatic nuisance species within the Project, the Aquatic SWG will assess the potential effects, if any, in order to make informed management decisions.

If the assessment identifies adverse effects to Aquatic Resources due to aquatic nuisance species attributable to changes in Project operations, Douglas shall consult with the Aquatic SWG to select and implement reasonable and appropriate PME(s) to address the identified adverse effect(s).

4.4 Reporting

Douglas will provide a draft annual report to the Aquatic SWG summarizing the previous year's activities undertaken in accordance with the ANSMP. The report will document all ANS activities conducted within the Project. Furthermore, any decisions, statements of agreement, evaluations, or changes made pursuant to this ANSMP will be included in the annual report. If significant activity was not conducted in a given year, Douglas will prepare a memorandum providing an explanation of the circumstances in lieu of the annual report.

5.0 REFERENCES

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APPENDIX B

PRE-FILING CONSULTATION RECORD FOR THE WELLS PROJECT AQUATIC NUISANCE SPECIES MANAGEMENT PLAN – 2013

AQUATIC NUISANCE SPECIES BEST MANAGEMENT PRACTICES
CONSULTATION RECORD

DATE	DESCRIPTION
February 13, 2013	Final Aquatic Settlement Work Group (Aquatic SWG) conference call minutes
February 13, 2013	Final Action Items from Aquatic SWG conference call
February 15, 2013	Email to Aquatic SWG regarding the Best Management Practices (BMPs) in the Aquatic Nuisance Species Management Plan (ANSMP)
March 13, 2013	Final Aquatic SWG conference call minutes
April 10, 2013	Final Aquatic SWG conference call minutes
April 10, 2013	Final Action Items from Aquatic SWG conference call
April 17, 2013	Email to National Marine Fisheries Service regarding approval of the BMPs in the ANSMP

FINAL MINUTES OF THE FEBRUARY 13, 2013 AQUATIC SWG CONFERENCE CALL

Final Conference Call Minutes



Aquatic Settlement Work Group

To: Aquatic SWG Parties **Date:** March 13, 2013
From: Michael Schiewe, Chair (Anchor QEA)
Re: Final Minutes of the February 13, 2013 Aquatic SWG Conference Call

The February Aquatic Settlement Work Group (SWG) met by conference call on Wednesday, February 13, 2013, from 10:00 a.m. to 11:15 am. Attendees are listed in Attachment A of these meeting minutes.

I. Summary of Action Items

1. Douglas PUD will distribute to the Aquatic SWG for review and comment the updated language to the Douglas PUD Aquatic Nuisance Species Management Plan along with an outline of potential aquatic nuisance species education pamphlet and outreach materials, per Article 405 of their Federal Energy Regulatory Commission (FERC) license (Item V-3).
2. Washington Department of Fish and Wildlife (WDFW) will discuss with the Yakama Nation (YN) the potential for the Colville Confederated Tribes (CCT) to conduct experimental fishing at the confluence of the Snake River and Columbia River, downstream of Ice Harbor Dam, for white sturgeon larval collection for the Wells Supplementation Project (Item V-6).
3. Mike Schiewe will brief and request approval from Pat Irle and Bob Rose on agreements discussed at the Aquatic SWG's February 13, 2013 conference call meeting regarding white sturgeon larval collection locations for the Wells Supplementation Project (Item V-6).

II. Summary of Decisions

1. There were no Statements of Agreement (SOAs) approved at today's meeting.

III. Agreements

1. Aquatic SWG members present approved the Douglas PUD 2012 Total Dissolved Gas Abatement Plan Report (Item V-2).
2. The Aquatic SWG members present supported collection of larval white sturgeon by the CCT at the following locations (in no priority): 1) the Rock Island tailrace and Wanapum Pool; 2) the Priest Rapids (PR) tailrace, including the reach near the confluence of the Snake and Columbia rivers; and 3) Lake Roosevelt. These collection efforts will occur in 2013 to meet Douglas PUD's FERC license requirements under the White Sturgeon Management Plan.

IV. Reports Finalized

1. No reports have been finalized since the last Aquatic SWG meeting.

V. Summary of Discussions

1. **Welcome, Agenda Review, and Meeting Minutes Review** (Mike Schiewe): Mike Schiewe welcomed the Aquatic SWG members (attendees are listed in Attachment A) and opened the meeting. Schiewe reviewed the agenda and asked for additions or other changes to the agenda. The following additions were requested:
 - Andrew Gingerich added a brief update on the Aquatic SWG 2013 Action Plan.
 - Steve Lewis added a discussion on No Net Impact (NNI) for Pacific Lamprey and Douglas PUD's role in contributing to this concept for the Wells Hydroelectric Project.

Kristi Geris reported that all comments and revisions received on the draft January 9, 2013 meeting minutes had been incorporated, and that no items remained to be discussed. The Aquatic SWG members present approved the January 9, 2013 meeting minutes, as revised.

2. **2012 Total Dissolved Gas Abatement Plan Report Approval** (Andrew Gingerich): Andrew Gingerich summarized that Douglas PUD and the Washington State Department of Ecology (Ecology) had worked together from October through December 2012 on edits and revisions to Douglas PUD 2012 Total Dissolved Gas Abatement Plan Report. He said that the report was distributed to the Aquatic SWG on January 11, 2013, and that the comment period closed on February 11, 2013. Gingerich reported that no additional Aquatic SWG comments were received on the draft report, aside from those received from U.S. Fish and Wildlife Service (USFWS) during the Aquatic SWG January 9, 2013 meeting, and also those received from Ecology. Gingerich added that comments received from Ecology and USFWS had already been incorporated into the draft report that was distributed to the Aquatic SWG on January 11, 2013. Gingerich confirmed that

Douglas PUD had received an email from Pat Irle stating that Ecology approved the final report.

Aquatic SWG members present approved Douglas PUD 2012 Total Dissolved Gas Abatement Plan Report.

3. **License Article 405: Aquatic Nuisance Species Management Plan Update within 6 Months of License Issuance (May 2013)** (Chas Kyger): Chas Kyger reported that as required by their new FERC license, Douglas PUD has developed draft modifications to their Aquatic Nuisance Species (ANS) Management Plan, including best management practices (BMPs) to prevent the spread of ANS during construction of recreation enhancement measures (per Section 4.1), and protocols to be implemented if ANS are detected during monitoring activities at the project (per Section 4.2.1). Kyger said that Douglas PUD plans to distribute the draft language to the Aquatic SWG for review. He summarized that modifications per Section 4.1 include BMPs for contractors, including requirements for general cleaning inspections and in-water work. Kyger said that modifications per Section 4.2.1 include response actions to any type of introduction of ANS. He explained that this broad approach was chosen over developing language specific to species and type of introduction.

Kyger said that in accordance with Section 401 of the Clean Water Act, Douglas PUD is also required to provide educational materials (e.g., pamphlets) at boat launches to increase boater awareness of the dangers of spreading ANS and to educate the public regarding the methods to decrease the spread of ANS. Kyger said that these educational materials supplement already available literature. Andrew Gingerich added that the deadline for producing these educational pamphlets and updating the ANS Management Plan is May 2013. Kyger said that along with the updated language to the ANS Management Plan, Douglas PUD will also provide to the Aquatic SWG an outline of potential ANS education pamphlet and outreach materials. He said that at this point, Douglas PUD is interested in narrowing down needed content (i.e., supplementing what already exists). Patrick Verhey noted that Grant PUD and Chelan PUD have also produced similar educational pamphlets and he suggested that Douglas PUD contact them to discuss what materials may already exist.

4. **Ladder Maintenance Update and Lamprey Study Plan Prep Update** (Chas Kyger): Chas Kyger reported that all modifications in preparation of the 2013 lamprey study should be in place in time for the start of the study. He said that modifications are complete in the Wells Dam east fish ladder, and that in the past week, the same modifications were being made in the Wells Dam west fish ladder. Kyger said that installation of the radio-telemetry (RT) equipment is anticipated to be complete by the end of the day; only final testing remains to be completed once the west ladder is re-watered.

5. **Lamprey Operation Changes and Modifications Amendment** (Andrew Gingerich): Andrew Gingerich said that Douglas PUD still does not know whether a license amendment will be required for the Pacific Lamprey count window modifications at Wells Dam. He added that Douglas PUD has not yet been assigned a FERC compliance officer to discuss details regarding this requirement. Gingerich reminded the Aquatic SWG that if the modifications can be characterized as temporary, a license amendment would not be required. He said, however, that Douglas PUD has consulted legal counsel who encouraged Douglas PUD to file a license amendment. Gingerich said that Douglas PUD will keep the Aquatic SWG updated as the process moves forward. Gingerich also noted that an SOA for a modified lamprey operations for 2013 was distributed to the HCP Coordinating Committees on February 12, 2013, and that the SOA will be up for approval at the February 26, 2013 meeting of the Coordinating Committees.
6. **White Sturgeon Larval Collection Locations for the Wells Supplementation Project** (Jason McLellan): Andrew Gingerich summarized that in fall 2011, the Aquatic SWG approved the White Sturgeon Broodstock Collection and Breeding Plan, and that subsequently, Douglas PUD released a related request for proposals (RFP). He said that an agreement was not reached on whether Douglas PUD supplementation program should focus on collection of naturally spawned larvae or on collection of broodstock and artificial spawning to meet their production goals. In the end it was agreed that Douglas PUD would fund both approaches in the first year of implementation. Gingerich said that the time to collect larval fish and broodstock is rapidly approaching, and that Douglas PUD is interested in Aquatic SWG members their input on priority locations for collection of white sturgeon larvae.

Jason McLellan said that the CCT has proposed three collection locations: 1) downstream of Rock Island Dam and Wanapum Pool; 2) downstream of PR Dam including McNary Pool; and 3) Lake Roosevelt. McLellan said that based on discussions with WDFW and the YN, both WDFW and the YN felt that collection of larvae in Lake Roosevelt should be the lowest priority. McLellan indicated that WDFW had initially recommended that the collection efforts focus downstream of The Dalles Dam in Bonneville Pool. However, McLellan said that further discussions with the YN made it clear that the YN, along with the other Columbia River Inter-Tribal Fish Commission (CRITFC) tribes, were not supportive of the CCT collecting larvae in Zone 6 (i.e., the Columbia River reach from Bonneville Dam to McNary Dam). McLellan suggested that opposition to the CCT collecting larvae in Zone 6 and Lake Roosevelt reduces their likelihood of collecting adequate numbers of larvae. Mike Schiewe asked if there is a scientific basis to not fish in Zone 6, or if the decision is based on jurisdiction. Chad Jackson replied that he had his suspicions as to why the CCT were excluded from Zone 6; however, he wanted to follow up with the YN to determine the exact reasons. McLellan said that he spoke with Bob Rose after the CRITFC decision and it was clear that the decision was based on policy implications. Schiewe then asked about the reasoning

behind making Lake Roosevelt collection the lowest priority, and McLellan replied that there is disagreement on the technical merits of using Lake Roosevelt fish. McLellan explained that WDFW was prioritizing collection between the PUD dams over Lake Roosevelt because they assumed downstream mixing was already occurring and they were interested in encouraging upstream mixing of genetic resources. McLellan suggested that because downstream gene flow was likely already occurring, Lake Roosevelt fish would be appropriate. Schiewe asked other Aquatic SWG members why, if in fact there is already downstream movement of larvae, Lake Roosevelt would not be a viable source of larvae for supplementation. Schiewe then asked about the value of facilitating upstream gene flow, and Jackson replied that based on discussions between WDFW, the YN, Grant PUD, and Chelan PUD during early implementation of the PUDs' respective white sturgeon supplementation programs, and prior to Andrea Drauch-Schreier's genetic analysis of Columbia River white sturgeon, there were differing opinions amongst researchers, managers, and other technical staff on stock structure, based on the available science. Jackson said that given these differing opinions, WDFW and the YN felt it was best for Grant PUD and Chelan PUD to collect sturgeon gametes from adult inhabiting the middle Columbia River. After Drauch-Schreier's study was released, there appeared to be a general acceptance that Columbia River white sturgeon are one population with apparent greater genetic relatedness between middle and upper Columbia River stocks and populations. He said that regardless of whether Lake Roosevelt larvae are in the mix, WDFW would like this source of fish to be available for all three PUDs' supplementation programs. Jackson concluded that at this time, WDFW prefers that the CCT obtain all fish from the PR project area to achieve numerical goals. He added, however, that because larvae collection success within the PR project area is unknown, WDFW will allow Lake Roosevelt larvae to be part of the 2013 collection efforts because the likelihood of success is very high there. Jackson also noted that there were logistical details regarding collection that need to be further discussed with the CCT.

Schiewe summarized that due to tribal policy related-issues in the Lower Columbia River (Zone 6), the CCT larval collection needs to come from the Columbia River upstream of McNary Dam. Schiewe noted that it would be a more robust program if fish were collected from different areas. McLellan agreed, however, he added that the fishing gear that the CCT has available is limited by velocity for two reasons: 1) keeping the gear in position; and 2) keeping the larvae alive. He said that the CCT is discussing fishing areas downstream of PR, perhaps as far south as the Tri-Cities (i.e., Kennewick, Pasco, and Richland, Washington). Jackson said that to his knowledge, there are no issues with the CCT fishing within the Hanford Reach downstream of PR Dam. McLellan added that it is apparent that the McNary Dam reach population moves around and that some fish spawn downstream of Ice Harbor Dam. He asked if there is concern with the CCT conducting experimental fishing downstream of Ice Harbor Dam. Jackson said that he was unsure, but that WDFW will discuss with the YN and specifically address the

potential for the CCT to conduct experimental fishing at the confluence of the Snake River and Columbia River. Gingerich asked if he was hearing that all parties present agreed that the three larval sturgeon collection locations—downstream of Priest Rapids Dam, downstream of Rock Island Dam, and within Lake Roosevelt—were acceptable to all group members present; specifically, for the purposes of collecting larval fish in 2013. Schiewe proceeded to ask each member present if all parties agreed to these three locations. All parties present agreed that the three locations proposed would be acceptable for 2013. Gingerich asked if concerns may be anticipated from those absent from this discussion, including the Washington Department of Ecology (Ecology) and the YN representatives. Schiewe said that he will brief and request approval from Pat Irle and Rose on agreements discussed regarding white sturgeon larval collection locations for the Wells Supplementation Project. *(Note: Pat Irle indicated her approval, via email on February 27, 2013, of the three proposed white sturgeon larval collection locations for the Wells Supplementation Project based on all fish managers reaching consensus, including the YN).* Gingerich asked if the CCT need to obtain collection permits from WDFW, and Jackson replied that yes, the CCT is required to have current WDFW scientific collection permit(s) for all collection area(s) of the Columbia River that they plan to collect larvae from, including the confluence of the Snake and Columbia rivers. McLellan said that the CCT and Grant PUD has applied for collection permits for downstream of Rock Island Dam and Wanapum Pool, and that the CCT has been advised by their legal counsel to not apply for permits for Lake Roosevelt because it is considered reservation boundary waters (which do not require a permit). He added that transport permits for all three locations would also be applied for. Jackson noted that the WDFW Fish Transport Permits required for larval fishing efforts in 2013 should be sent directly to him for any and all of the agreed upon fishing locations, and that he would help move them through the permitting process. McLellan acknowledged this and agreed to send permits directly to Jackson.

7. **Aquatic SWG 2013 Action Plan** (Andrew Gingerich): Andrew Gingerich reminded the Aquatic SWG that the Aquatic SWG 2013 Action Plan was reviewed at the January 9, 2013 meeting, and that an electronic version of the action plan was distributed to the Aquatic SWG on January 2, 2013. Gingerich said that no comments have been received on the plan with the exception of those edits discussed during the Aquatic SWG January 9, 2013 meeting; however, revisions have been made to elements in the Pacific Lamprey Management Plan, as distributed to the Aquatic SWG on January 28, 2013. Gingerich said that based on year 1 requirements outlined in their FERC license, Douglas PUD decided to remove some of the Pacific Lamprey activities previously included in the Aquatic SWG 2013 Action Plan.
8. **NNI and Pacific Lamprey Management Plan** (Steve Lewis): Steve Lewis recommended including a component of NNI in the Aquatic SWG 2013 Action Plan. Andrew Gingerich recalled similar discussions amongst the Aquatic SWG members at the October 10, 2012

and November 13, 2012 meetings. He explained that Douglas PUD remains committed to the Pacific Lamprey Management Plan (PLMP), which contains similar components of the JFP proposal such as juvenile habitat use, and that Douglas PUD does not feel that another document is needed. He added that specific language for “no net impact” is not found within the PLMP or the ASA and the term NNI remains largely undefined in circles outside of the Aquatic SWG, and Douglas PUD does not see value in trying to define NNI. Gingerich said that Douglas PUD is showing their commitment to Pacific Lamprey by conducting the Pacific Lamprey Passage Study, which has specific intent to address objectives in the PLMP. Lewis suggested that some issues have changed since the development of the PLMP, especially those related to policy. He agreed with the difficulties in defining NNI, and added that there are ways to modify a plan and still keep the general concept; he said, for example, that they could do what was done for the bull trout study in early 2000. This bull trout study included a high level of coordination between USFWS and Douglas PUD regarding the upstream and downstream passage of tagged bull trout through the Wells Dam and within tributaries both upstream and downstream of the Wells Dam. Gingerich replied that if USFWS thought something needed to be accomplished within the context of the PLMP, Douglas PUD would encourage that they bring forward a very specific study that the Aquatic SWG could discuss and potentially approve, like that which was completed for the passage study, instead of creating a new management plan that is broad and undefined in terms of scope. He recalled that the NNI document presented at the Aquatic SWG’s October 10, 2012 meeting contained a lot of broad language with few specifics measure or study items; therefore, it did not seem to be a very productive approach that fit within the contents of existing PLMP objectives. Lewis asked if Douglas PUD plans to participate in tributary studies, and Gingerich said that the tributary components are outside of the scope of the PLMP. Gingerich added, however, that Douglas PUD would collaborate on these efforts by sharing data or tag codes if another agency funded some other aspect of a study, which was outside the scope of the PLMP. He explained that Douglas PUD can only participate in a way that is consistent with the existing Well Settlement Agreement that the Aquatic SWG member organizations signed off on. Lewis asked if Douglas PUD would be interested in installing arrays in the Chewuch River and in other locations in the Methow Basin, and Gingerich replied that Douglas PUD would need to review a formal proposal and added that he thinks the response would be that it is outside of the scope of this year’s study objectives. He said that if the request is to collaborate on sharing Passive Integrated Transponder (PIT) tag data from the lamprey passage study, then that would likely be no problem. Mike Schiewe noted that it would be a good opportunity to share and capitalize on data being collected during the lamprey study. Lewis agreed that a proposal would be a good approach, and added that he was only trying to gauge Douglas PUD’s interest in this type of suggestion. Gingerich said that the proposal would need to contain specific details and that it would need to speak to one of Douglas PUD’s management plans to get any traction with Douglas PUD managers. Lewis said that USFWS is largely focused on passage and tributary efforts,

and Gingerich said that Douglas PUD is on board with those efforts. Patrick Verhey said that more discussions are planned and, as things solidify, he said that he anticipates that Douglas PUD will be invited to further participate in these discussions.

VI. Next Meetings

1. Upcoming meetings: *March 13, 2013 (conference call); April 10, 2013 (conference call); and May 8, 2013 (conference call).*

List of Attachments

Attachment A – List of Attendees

Attachment A List of Attendees

Name	Role	Organization
Mike Schiewe	SWG Chair	Anchor QEA, LLC
Kristi Geris	Administration/Technical Support	Anchor QEA, LLC
Andrew Gingerich	SWG Technical Representative	Douglas PUD
Chas Kyger	Technical Support	Douglas PUD
Steve Lewis	SWG Technical Representative	U.S. Fish and Wildlife Service
Patrick Verhey	SWG Technical Representative	Washington Department of Fish and Wildlife
Chad Jackson	Technical Support	Washington Department of Fish and Wildlife
Jason McLellan	SWG Technical Representative	Colville Confederated Tribes

FINAL ACTION ITEMS OF THE FEBRUARY 13, 2013 AQUATIC SWG CONFERENCE
CALL

Final Conference Call Action Items



Aquatic Settlement Work Group

To: Aquatic SWG Parties **Date:** February 13, 2013
From: Michael Schiewe, Chair (Anchor QEA)
Re: Final Action Items of the February 13, 2013, Aquatic SWG Conference Call

Below is a summary of Action Items from the Aquatic SWG meeting held by conference call from 10:00 am to 11:15 am on Wednesday, February 13, 2013. These action items include the following:

I. Summary of Action Items

1. Douglas PUD will distribute to the Aquatic SWG for review and comment updated language to the Douglas PUD Aquatic Nuisance Species Management Plan along with an outline of potential aquatic nuisance species education pamphlet and outreach materials, per Article 405 of their Federal Energy Regulatory Commission (FERC) license (Item V-3).
2. Washington Department of Fish and Wildlife (WDFW) will discuss with the Yakama Nation (YN) the potential for the Colville Confederated Tribes (CCT) to conduct experimental fishing at the confluence of the Snake River and Columbia River below Ice Harbor Dam for white sturgeon larval collection for the Wells Supplementation Project (Item V-6).
3. Mike Schiewe will brief and request approval from Pat Irle and Bob Rose on agreements discussed at the Aquatic SWG February 13, 2013 conference call meeting regarding white sturgeon larval collection locations for the Wells Supplementation Project (Item V-6).

II. Summary of Decisions

1. There were no Statements of Agreement (SOAs) approved at today's meeting.

III. Agreements

1. Aquatic SWG representatives present approved the Douglas PUD 2012 Total Dissolved Gas Abatement Plan Report (Item V-2).

IV. Reports Finalized

1. No reports have been finalized since the last Aquatic SWG meeting.

EMAIL TO AQUATIC SETTLEMENT WORK GROUP REGARDING THE BEST
MANGEMENT PRACTICES IN THE AQUATIC NUISANCE SPECIES MANAGEMENT
PLAN AND EDUCATION/OUTREACH MATERIALS

From: [Kristi Geris](#)
To: [Andrew Gingerich](#); [Bao Le](#); [Beau Patterson](#); [Bill Towey \(bill.towey@colvilletribes.com\)](#); [Bob Jateff \(jatefrj@dfw.wa.gov\)](#); [Bob Rose](#); "Brad James"; "Bret Nine"; "Chad Jackson"; [Charlie McKinney \(cmck461@ecy.wa.gov\)](#); [Chas Kyger](#); [Chris Sheridan](#); "Donella Miller"; [Jason McLellan](#); [Jeff Korth \(korthjwk@dfw.wa.gov\)](#); "Jessi Gonzales"; [Joe Peone \(joe.peone@colvilletribes.com\)](#); [kirk.truscott@colvilletribes.com](#); [Mary Mayo](#); [Mike Schiewe](#); [Molly Hallock \(hallomh@dfw.wa.gov\)](#); [Pat Irle \(pir1461@ecy.wa.gov\)](#); "Patrick Luke"; [Patrick Verhey \(Patrick.Verhey@dfw.wa.gov\)](#); [Paul Ward \(ward@yakama.com\)](#); [Shane Bickford](#); "Steve Lewis"; "Steve Parker (parker@yakama.com)"; [Steve Rainey](#)
Subject: FW: ANS BMPs and outreach
Date: Friday, February 15, 2013 3:56:55 PM
Attachments: [2013_02_15 Douglas - Douglas License Article 405.pdf](#)
[2013_02_15 Douglas - Douglas ANS BMPs 2-14-13.docx](#)
[2013_02_15 Douglas - CustomizableBoat_PSA.pdf](#)
[2013_02_15 Douglas - ZaptheZebra2011.pdf](#)

Hi Aquatic SWG: please see the email below from Chas and the attached ANS BMPs and education/outreach materials.

Thanks and have a great weekend!
Kristi ☺

Kristi Geris

ANCHOR QEA, LLC

kgeris@anchorqea.com

This electronic message transmission contains information that may be confidential and/or privileged work product prepared in anticipation of litigation. The information is intended for the use of the individual or entity named above. If you are not the intended recipient, please be aware that any disclosure, copying distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by telephone at (206) 287-9130.

From: Chas Kyger [mailto:chask@dcpud.org]
Sent: Friday, February 15, 2013 3:52 PM
To: Kristi Geris
Subject: ANS BMPs and outreach

Hi Kristi,

Can you please distribute the attached ANS BMPs and education/outreach materials to the workgroup.

During the call on Wednesday we introduced Douglas' strategy for developing the BMPs for response to ANS introduction and preventative measures to be implemented during construction, part of new requirements in Article 405 of the license. The list attached here contains the specific BMPs in more detail. Also included is Article 405 of the license which outlines the required modifications. We would like to receive any comments or suggestions workgroup members may have before the next meeting.

Also attached are two possible ANS education/outreach pamphlets for placement at public access facilities in the Wells Project. These pamphlets are from US Fish and Wildlife Service Stop Aquatic

Hitchhikers campaign. We will also coordinate with Chelan PUD and WDFW to ensure consistency of outreach materials at other access sites in the area and work to gather more potential outreach materials before the next meeting.

Thanks,

Chas

Chas Kyger
Aquatic Resource Biologist
Douglas County Public Utility District No. 1
(509) 881-2388

FINAL MINUTES OF THE MARCH 13, 2013 AQUATIC SWG CONFERENCE CALL

Final Conference Call Minutes



Aquatic Settlement Work Group

To: Aquatic SWG Parties **Date:** April 10, 2013
From: Michael Schiewe, Chair (Anchor QEA, LLC)
Re: Final Minutes of the March 13, 2013 Aquatic SWG Conference Call

The Aquatic Settlement Work Group (SWG) met by conference call on Wednesday, March 13, 2013, from 10:00 a.m. to 11:30 am. Attendees are listed in Attachment A of these meeting minutes.

I. Summary of Action Items

1. Mike Schiewe will revise the draft White Surgeon Collection Plan Statement of Agreement (SOA) and redistribute the revised SOA to the Aquatic SWG for review. Email approval of the SOA is needed no later than March 20, 2013 (Item V-2).
2. The Aquatic SWG will submit comments on the draft Aquatic Nuisance Species (ANS) Best Management Practices (BMPs) and education/outreach materials to Chas Kyger no later than April 1, 2013. Douglas PUD will request approval of these materials at the Aquatic SWG's April 10, 2013 meeting (Item V-3).
3. Andrew Gingerich will provide annual reports for each Aquatic Settlement Agreement Management Plan (six in total) to the Aquatic SWG for review. Douglas PUD will request approval of these annual reports no later than the Aquatic SWG's May 8, 2013 meeting (Item V-4).

II. Summary of Decisions

1. There were no SOAs approved at today's meeting.

III. Agreements

1. Aquatic SWG representatives present agreed, in principle, to proposed revisions to the draft White Surgeon Collection Plan SOA, including: 1) prioritization of Mid-Columbia locations for larval collection efforts by the Colville Confederated Tribes (CCT); 2) broodstock collection locations for the Yakama Nation (YN); and 3) deferred

development of a detailed stocking plan until numbers of juvenile sturgeon from the different locations and sourcing methods are known. This agreement will be formalized by email concurrence of a revised SOA (Item V-2; Action Item I-1).

IV. Reports Finalized

1. No reports have been finalized since the last Aquatic SWG meeting.

V. Summary of Discussions

1. **Welcome, Agenda Review, and Meeting Minutes Review** (Mike Schiewe): Mike Schiewe welcomed the Aquatic SWG members (attendees are listed in Attachment A) and opened the meeting. Schiewe reviewed the agenda and asked for additions or other changes to the agenda. No additions or changes were requested.

Kristi Geris reviewed comments and revisions on the draft February 13, 2013 meeting minutes that were received after the revised minutes had been distributed to the Aquatic SWG on March 5, 2013. She said that Pat Irle clarified that her approval of the proposed white sturgeon larval collection locations was contingent on all fish managers reaching consensus. Geris also reviewed edits made by Steve Lewis, including: 1) clarification that the three larval white sturgeon collection locations are listed in no order of priority; 2) clarification to the content of Lewis's added agenda item; 3) acknowledgement of U.S. Fish and Wildlife Service's (USFWS's) comments to the 2012 Total Dissolved Gas Abatement Plan Report; 4) clarification regarding who has applied for collection permits, and why the Confederated Coleville Tribes (CCT) were not applying for a permit to collect larva in Lake Roosevelt (their own CCT territorial waters); 5) acknowledgement of edits discussed on the Aquatic SWG 2013 Action Plan; 6) clarification that Lewis recommended—not requested—that a component of No Net Impact (NNI) be included in the Aquatic SWG 2013 Action Plan; and 7) additional background language regarding the collaborative efforts between USFWS and Douglas PUD on the early 2000 bull trout study.

The Aquatic SWG members present approved the February 13, 2013 meeting minutes, as revised.

2. **DECISION: White Surgeon Collection Statement of Agreement** (Andrew Gingerich): Andrew Gingerich said that the draft White Surgeon Collection Plan SOA was distributed to the Aquatic SWG by Kristi Geris on February 28, 2013. He said that comments were received from Chad Jackson and Jeff Korth on the draft SOA, as distributed to the Aquatic SWG by Geris on March 4, 2013, and March 13, 2013, respectively. Gingerich also noted a typo in the final paragraph of the background information. He said that the reference to the June 2014 SOA should read "June 2012 SOA." He reminded the Aquatic SWG that the June 2012 SOA approved a dual strategy for the collection of white

sturgeon offspring including the implementation of wild larval collection and adult brood collection programs, to be utilized for four years toward identifying the best strategy for the long-term supplementation of white sturgeon in the Wells Project.

Gingerich noted concern regarding Korth's proposed edit of the draft SOA, specifically, the addition, *"In the event that insufficient numbers of larvae are captured to produce half of Douglas PUD's program, Lake Roosevelt fish may be used to produce up to half the program in 2013 only."* Gingerich said that the purpose of this SOA was to approve broodstock collection locations in order to facilitate moving forward with logistical planning such as obtaining permits—not to get into the details of stocking programs. He added that once the fish are obtained, stocking plans can be addressed. Korth explained that Washington Department of Fish and Wildlife's (WDFW's) agreement to add Lake Roosevelt as a collection location was based on prioritizing which fish get used first. He added that this decision had also been vetted within an informal Mid-Columbia Sturgeon Technical Workgroup. He said that the intent of this statement was to ensure that there is a strong effort to use Mid-Columbia-origin fish first, before using fish from Lake Roosevelt. Korth said that he is open to discussing the proportion of fish from Lake Roosevelt used, but in terms of priorities, WDFW maintains that it is appropriate that the Mid-Columbia collection is a priority over Lake Roosevelt. Mike Schiewe reminded the Aquatic SWG members that the purpose of this SOA is to document agreement on collection locations, and not to define a detailed stocking plan. He added that once fish are in the hatchery, then priorities will be discussed. Korth replied that adding Lake Roosevelt as a collection site is dependent on the priority. Bob Rose agreed that capture efforts do need to be focused in the Mid-Columbia. Gingerich said that he is concerned that specifying any proportion from any location was premature because technical discussions on the merits of Lake Roosevelt fish (or fish from any location) have not taken place. He said that he understands state agencies' desire to move fish upstream; however, that is outside of the scope of this SOA.

Jason McClellan said that he would like any discussion of stocking left out of this SOA. He said that stocking requires a program-wide technical discussion and a SOA of its own. McClellan added that he is not familiar with the informal Mid-Columbia Sturgeon Technical Workgroup, and he has no objections if WDFW and the YN choose to consult this informal workgroup; however, he prefers that the technical merits of the stocks used and prioritizations are decided within the Aquatic SWG. Rose explained that this informal workgroup largely grew out of Chelan PUD and Grant PUD license implementation discussions, and that Douglas PUD is now reaching a similar stage in implementation of their new license for the Wells Project. He said that an invitation to participate in the workgroup had been extended to the CCT, however, this was prior to McClellan's employment with the CCT. Rose said he appreciated McClellan's comments, and noted that it would be a good idea to reevaluate the Mid-Columbia Sturgeon Technical Workgroup in terms of its composition and path forward. Korth added that

the workgroup was intended to be an advisory group, and their input was not meant to override the Aquatic SWG.

Korth acknowledged the long standing disagreement among the fish forum participants and PUDs about sturgeon population structure, but he said that WDFW's position is that there is greater diversity downstream, and that it would enhance population diversity to move fish upstream.

Steve Lewis said the USFWS agreed with the CCT position that stocking should not be included in this SOA, and suggested modifying the language to keep it broad. Schiewe asked the Aquatic SWG if editing Korth's added sentence specifying stocking proportions to instead focus on sampling effort and keep the SOA focused on collection locations would be acceptable. McClellan said that the CCT have no objections to moving fish upstream; and however, he added, nor does the CCT have objections to collecting at Lake Roosevelt. He said that the CCT just wants the ability to collect fish where they know there is likely to be high success. He added that the CCT are concerned that their opportunity to succeed is being limited.

Gingerich suggested prioritizing the fishing locations. Schiewe said that, for example, the SOA could define the CCT collection locations in order of priority and then add a statement that the Aquatic SWG will develop a detailed stocking program placing priority on moving gene flow upstream. McClellan said that the CCT do not want to include any prioritization regarding stocking until it is known what fish are on hand. Rose said that his main concern is that Lake Roosevelt should be a lesser priority for fish collection. McClellan said that the CCT are planning for a substantially greater fishing effort in the Mid-Columbia than in Lake Roosevelt. Schiewe said, then, that the SOA can simply define collection locations, indicating the greater fishing effort in the Mid-Columbia than in Lake Roosevelt, and specify that the Aquatic SWG will develop a stocking program prior to releasing the stock on hand spring 2014.

Pat Irle asked for clarification of the genetics issue, and McClellan explained that genetic diversity, as measured by the number of polymorphic alleles (i.e., number of different alleles at genetic loci), tends to be greater in downstream populations. He said that as a result, fish collected downstream of McNary Dam in the Columbia River could potentially contribute to increasing allelic diversity in upstream populations. However, with larval collection, he said that naturally-produced larvae have the potential to introduce greater numbers of alleles from wild populations regardless of the collection location, than the breeding a few select adults collected downstream does. Additionally, offspring released from larval collection are unlikely to be genetically related, and therefore, represent a greater number of crosses. In that way, McClellan said, using larval collection increases genetic diversity. Gingerich added that these are the types of technical issues that need to be discussed once fish are on hand.

McClellan said that because sturgeon in the Mid-Columbia and Lake Roosevelt spawn at about the same time, the CCT will be simultaneously collecting at multiple areas. He said that the plan is to focus collection efforts downstream of Rock Island Dam and Wanapum Pool. Lake Roosevelt fish will be held separately. He said that once fish are on hand, then it can be decided what fish to keep. Rose said that he did not realize there was such synchronicity with timing. Korth asked if the Spokane Tribe of Indians (STI) typically collects more fish than they need for their Lake Roosevelt Program; and if so, he asked if they could hold them for the Douglas PUD program. McClellan said that he plans to have further discussions with the STI regarding the logistics of collecting larvae at Lake Roosevelt, and that he will know more about available options once those discussions take place.

Schiewe suggested that the revised draft SOA state that larval collection by the CCT will focus in the Priest Rapids Project Area and the Hanford Reach of the Columbia River from Priest Rapids Dam downstream to the Vernita Bridge, and in Lake Roosevelt (in that priority of effort). The YN collection locations will be defined as occurring in the Columbia River, between Bonneville Dam and Rock Island Dam. Lastly, the SOA will state that stocking decisions will be made by spring 2014, and will be based on what fish are on hand. McClellan said that the CCT can agree to that; however, he noted that the majority of the CCT's Mid-Columbia collection effort will occur downstream of Rock Island Dam. Aquatic SWG representatives present agreed, in principle, to the proposed revisions to the draft White Surgeon Collection Plan SOA, including: 1) prioritization of Mid-Columbia locations for larval collection efforts by the CCT; 2) broodstock collection locations for the YN; and 3) deferred development of a detailed stocking plan until numbers of juvenile sturgeon from the different locations and sourcing methods are known. Schiewe said that he will revise the draft White Surgeon Collection Plan SOA and redistribute the revised SOA to the Aquatic SWG for review. Email approval of the SOA is needed no later than March 20, 2013.

3. **Aquatic Nuisance Species Best Management Practices Update/Comments (Chas Kyger):** Chas Kyger said that, as discussed at the Aquatic SWG's February 13, 2013 meeting, there are new Federal Energy Regulatory Commission (FERC) requirements for Douglas PUD's ANS Program, including incorporating BMPs and ANS detection protocols in their ANS Management Plan. Kyger said that draft ANS BMPs and education and outreach materials were distributed to the Aquatic SWG by Kristi Geris on February 15, 2013. He said that no comments have been received to date, and that Douglas PUD would like to establish an official comment period deadline to keep the process moving forward.

Steve Lewis asked if the plan and educational materials are consistent with those developed by the other PUDs, and Kyger confirmed that they are similar to the Chelan

PUD and Grant PUD ANS materials. Kyger said that Douglas PUD is also considering developing a voluntary boater self-survey, as Chelan PUD has done; and Bob Rose added that Grant PUD also has a similar survey. Pat Irle said that she provided Douglas PUD's ANS materials to the Washington State Department of Ecology's (Ecology's) ANS specialist, and that she has not received any concerns on the materials. Kyger noted a minor typo in the draft ANS BMPs that were distributed on February 15, 2013, under modifications per Section 4.2.1, fifth bullet, last sentence: *In the case of zebra mussels or other Dreissendid species,*. Kyger explained that this fragmented sentence does not pertain to this bullet and will be removed.

No other comments on the draft ANS materials were discussed at this time. The Aquatic SWG agreed to submit comments on the draft ANS BMPs and education and outreach materials to Kyger no later than April 1, 2013. Douglas PUD will request approval of these materials at the Aquatic SWG's April 10, 2013 meeting.

4. **Annual Technical Memorandums/Reports for each Management Plan** (Andrew Gingerich): Andrew Gingerich said that the new FERC license requires annual reports to be completed for all six Aquatic Settlement Agreement Management Plans. He said that Douglas PUD is currently developing all six reports for 2012, and that within the next couple of weeks, he plans to provide the reports to the Aquatic SWG for review. Gingerich said that he would like to provide at least a 30-day review period for each plan, keeping in mind, however, the FERC submittal deadline for these reports, which is at the end of May 2013. Gingerich said that he will include a review period deadline for each report as they are distributed. He added that the format to expect will be the actual management plans with an italicized update incorporated after each applicable section. He said that Douglas PUD will request approval of these annual reports no later than the Aquatic SWG's May 8, 2013 meeting.
5. **HCP Coordinating Committees' Approval of the Pacific Lamprey Statement of Agreement Providing Head Differential Changes for 2013 in the Wells Dam Collection Gallery** (Andrew Gingerich): Andrew Gingerich said that Kristi Geris distributed an email on February 26, 2013, notifying the Aquatic SWG that the Wells Dam 2013 Pacific Lamprey Operations were approved by the HCP Coordinating Committees. Gingerich explained that the 2013 lamprey operations are similar to those approved in the previous years; only this year, the operations also include specific treatments for the Adult Lamprey Passage and Enumeration Study. Steve Lewis questioned whether specifying a timeframe (i.e., 19:00 to 02:00) in the SOA might be constraining, and Gingerich replied that this timeframe is consistent with previous years' lamprey operations, and is also based on results from the DIDSON studies. Gingerich added that if this timeframe needed to be changed then a new request and approval from the Coordinating Committees would be required. Bob Rose said that if Lewis or any others

have alternative ideas it would be a good idea to present them to the Coordinating Committees now, instead of at the last minute.

VI. Next Meetings

1. Upcoming meetings: *April 10, 2013 (conference call); May 8, 2013 (conference call); and June 12, 2013 (conference call).*

List of Attachments

Attachment A – List of Attendees

Attachment A List of Attendees

Name	Role	Organization
Mike Schiewe	SWG Chair	Anchor QEA, LLC
Kristi Geris	Administration/Technical Support	Anchor QEA, LLC
Andrew Gingerich	SWG Technical Representative	Douglas PUD
Chas Kyger	Technical Support	Douglas PUD
Pat Irle	SWG Technical Representative	Washington State Department of Ecology
Steve Lewis	SWG Technical Representative	U.S. Fish and Wildlife Service
Patrick Verhey	SWG Technical Representative	Washington Department of Fish and Wildlife
Jeff Korth†	Technical Support	Washington Department of Fish and Wildlife
Bob Rose	SWG Technical Representative	Yakama Nation
Jason McLellan	SWG Technical Representative	Colville Confederated Tribes
Keith Hatch	Observer	Bureau of Indian Affairs

Notes

† Joined for the White Surgeon Collection SOA discussion

FINAL ACTION ITEMS OF THE APRIL 10, 2013 AQUATIC SWG CONFERENCE CALL

Final Conference Call Action Items



Aquatic Settlement Work Group

To: Aquatic SWG Parties **Date:** April 10, 2013
From: Michael Schiewe, Chair (Anchor QEA)
Re: Final Action Items of the April 10, 2013, Aquatic SWG Conference Call

Below is a summary of Action Items from the Aquatic SWG meeting held by conference call from 10:00 am to 11:00 am on Wednesday, April 10, 2013. These action items include the following:

I. Summary of Action Items

1. Aquatic SWG representatives will submit comments and/or their formal approval of the draft 2012 Aquatic SWG Annual Report to Andrew Gingerich no later than April 15, 2013 (Item V-4).
2. Andrew Gingerich will provide annual reports for each Aquatic Settlement Agreement Management Plan (six total) to the Aquatic SWG for review. Douglas PUD will request approval of these annual reports at the Aquatic SWG May 8, 2013 meeting (Item V-4).

II. Summary of Decisions

1. The White Surgeon Collection Plan Statement of Agreement (SOA) was approved by the Aquatic SWG via email on March 20, 2013 (Item V-5).

III. Agreements

1. Aquatic SWG representatives present approved Douglas PUD's Aquatic Nuisance Species (ANS) Best Management Practices (BMPs) and education/outreach materials (Item V-2).
2. Aquatic SWG representatives present approved the 2013 Aquatic SWG Action Plan (Item V-3).

IV. Reports Finalized

1. No reports have been finalized since the last Aquatic SWG meeting.

EMAIL FROM NMFS REGARDING APPROVAL OF THE BEST MANAGEMENT
PRACTICES IN THE AQUATIC NUISANCE SPECIES MANAGEMENT PLAN

From: Bryan Nordlund - NOAA Federal
To: Tom Kahler
Cc: Chas Kyger; Andrew Gingerich
Subject: Re: FERC-required updates to the Aquatic Nuisance Species Management Plan
Date: Wednesday, April 17, 2013 1:26:54 PM

Tom - I checked around internally to see if had NMFS NW regional person assigned to nuisance species issues. I recall that we used to, but he has retired and those that I spoke to said that there has been no replacement.

That said, I took on review of your BMP modifications to the Plan. Nothing in the document caused any major concerns. In fact, I appreciate the pro-active nature of the document and the work that DPUD and the Aquatic Workgroup has done on this issue. I did wonder why Grant PUD was left off your notification list.

So from NMFS perspective, I approve.
Bryan Nordlund

On Wed, Apr 10, 2013 at 4:16 PM, Tom Kahler <tomk@dcputd.org> wrote:

Hi Bryan,

I appreciate your help on this ANS issue as we discussed on the phone a few minutes ago. Attached are three documents: 1) the updates to the ANS Management Plan that the Wells Aquatic Settlement Work Group approved yesterday; 2) Article 405 from our new license that defines our requirements for updating the plan and for including "consultation" with NMFS in the approval process for those updates; and 3) the original ANS Management Plan that was updated yesterday per Article 405. Our timeline on this is that we need to file the approved updates with FERC within six months of the issuances of the license, which gives us until May 8. Please let me know if you need additional information to assist in your (or other NMFS rep, as we discussed) review of these updates to the ANS Management Plan.

Thanks again,

Tom

Tom Kahler

Fisheries Biologist

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