# Memorandum

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| Date: | August 27, 2020 |
| Subject: | Kalama Manufacturing and Marine Export Facility – Incidental Harassment Authorization (IHA) Renewal Request – requesting IHA coverage from October 19, 2020, to October 19, 2021 |
| From: | Dan Gunderson, Senior Scientist |
| To: | Jolie Harrison, Division Chief, Permits and Conservation Division, NOAA Fisheries Office of Protected Resources |
| CC: | Tabitha Reeder, Environmental Manager, Port of Kalama |

## INTRODUCTION

The Port of Kalama (Port) received an Incidental Harassment Authorization (IHA) from the NOAA Fisheries' Office of Protected Resources for the Kalama Manufacturing and Marine Export Facility (the project) under the Marine Mammal Protection Act (MMPA). The IHA (dated October 17, 2019) is valid through October 18, 2020.

The Port is currently working to obtain all regulatory authorizations necessary for construction; no work authorized by the existing IHA has been conducted. The Port does not anticipate being able to begin construction during the valid period for the existing IHA. For this reason, the Port requests that the IHA be renewed to allow for work between October 19, 2020, and October 19, 2021, during the work window described below.

Provision #8 of the IHA allows NOAA to issue a one-year IHA renewal when 1) another year of identical or nearly identical activities as described in the Specified Activities section is planned or 2) the activities would not be completed by the time the IHA expires and a second IHA would allow for completion of the activities beyond that described in the Dates and Duration section.

The Port has not conducted any of the work described in the existing IHA, and the Port does not propose any changes to the proposed project, aside from the schedule change. Additionally, there have been no changes in the population/distribution of marine mammals in the Columbia River that would affect the take estimates from the original application.

The purpose of this memorandum is to provide a formal request for an IHA renewal, authorizing work between October 19, 2020, and October 19, 2021.

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## PROPOSED PROJECT

The proposed project is documented in the 2018 IHA application addendum (dated June 21, 2018). The proposed project consists of the construction of a facility to manufacture and export methanol on approximately 100 acres on the Columbia River at the Port's North Port site.

The proposed project will consist of a methanol production facility, accessory support and infrastructure facilities located in upland areas, and a new marine terminal located on the Columbia River. The proposed project also includes compensatory mitigation activities. The Port does not propose any changes or modifications to the proposed project.

## DATES AND DURATION

The proposed dates and duration are identical to those proposed in the existing IHA, except that this request is for coverage from October 19, 2020, to October 19, 2021.

Pile installation will be conducted on up to 153 days within the 2020-2021 pile driving window (September 1 – January 31). Pile installation will be conducted during standard daylight working hours, roughly 8 to 10 hours a day.

## TAKE ESTIMATES

The three marine mammal species, subspecies, or distinct population segment (DPS) with known distribution ranges that include the portion of the Columbia River in which construction activities will occur are listed in Table 1 and are addressed in this IHA request.

**Table 1. Marine Mammal Species Addressed in this IHA Request**

| Species Name | | ESA Listing Status | Stock |
|---|---|---|---|
| **Common Name** | **Scientific Name** | | |
| Harbor Seal | *(Phoca vitulina ssp. richardsi)* | Not listed | OR/WA coast stock |
| California Sea Lion | *(Zalophus californianus)* | Not listed | U.S. stock |
| Steller Sea Lion | *(Eumatopius jubatus)* | Not listed | Eastern DPS |

All of the marine mammals addressed in this document are pinniped species that use the portion of the Columbia River within the action area as a seasonal corridor for foraging.

The U.S. Army Corps of Engineers (USACE) has monitored pinniped presence and salmonid predation at Bonneville Dam (RM 146) since 2002, and has published regularly updated data on pinniped presence at the Bonneville Dam (Tidwell et al. 2020). In both 2017 and 2018 (the most recent years for which published data is available), the numbers of both California sea lions and Steller sea lions were within the range of historical variability. Harbor seals are rarely observed at the Bonneville Dam and were recorded at low numbers consistent with those reported in previous years. The latest USACE data does not suggest a trend that would require a modification to the take estimates or to the effects analysis.

Therefore, the Port is requesting the same level of take authorized in the current IHA, as there has been no significant change in population density, and no change in marine mammal presence is anticipated.

## MARINE MAMMAL MONITORING PLAN

The marine mammal monitoring plan establishes Level A injury protection zones for each pile type/installation method, where pile driving activities will be shut down if marine mammals enter. The monitoring plan also establishes the protocol for monitoring of Level B harassment zones for the purpose of monitoring and reporting Level B takes of marine mammals.

No work has been conducted to date on the project and, as such, no monitoring has been conducted. The same marine mammal monitoring plan approved for the 2019-2020 IHA will be implemented for the 2020-2021 IHA.

## SUMMARY AND REQUEST

As described above, the Port is submitting this request for an IHA renewal consistent with the existing IHA for the project, but with dates authorizing the work described above for the 2020-2021 (October 19, 2020, to October 19, 2021) work window.

The Port does not propose any changes to the proposed action, aside from schedule, and there have been no changes in the population/distribution of marine mammals in the Columbia River that would affect the take estimates from the original application.

## REFERENCES

California Department of Transportation (Caltrans). 2012. Technical Guidance for Assessment and Mitigation of the Hydroacoustic Effects of Pile Driving on Fish. Updated October 2012.

Jeffries, S. J., P. J. Gearin, H. R. Huber, D. L. Saul, and D. A. Pruett. 2000. Atlas of seal and sea lion haulout sites in Washington. Washington Department of Fish and Wildlife, Wildlife Science Division, Olympia. 139 pp.

Tidwell, K.S., D.A. McCanna, R.I. Cates, C.B. Ford and B.K. van der Leeuw. 2020. EVALUATION OF PINNIPED PREDATION ON ADULT SALMONIDS AND OTHER FISH IN THE BONNEVILLE DAM TAILRACE, 2019. U.S. Army Corps of Engineers, Portland District, Fisheries Field Unit. Cascade Locks, OR. 60 pp.

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