



Confederated Tribes and Bands  
of the Yakama Nation

Established by the  
Treaty of June 9, 1855

October 6, 2006

Mr. Tom Karier, Chair  
Northwest Power and Conservation Council  
851 S.W. Broadway, Suite 1100  
Portland, OR 97205

Re: Yakama Nation comments on draft project selection recommendations

Dear Mr. Karier,

I am writing on behalf of the Yakama Nation to comment on the Northwest Power and Conservation Council's draft recommendation for mitigation projects to be included in the Bonneville Power Administration's annual budgets for Fiscal Years 2007 through 2009. The Yakama Treaty of 1855 (12 Stat 951) reserved rights to catch fish and to have fish present to catch in perpetuity for tribal members at all usual and accustomed places in the Columbia Basin. These rights have been upheld in numerous federal courts. The courts further recognize that the Yakama Nation is a sovereign co-manager of fishery resources in the Columbia River.

Since the time of signing the Treaty, Treaty-reserved rights to catch fish have been severely impaired by the reduction in fish abundance caused by human population growth and development. This impairment has translated into adverse cultural and economic impacts to the Yakama Nation and its members. The Yakama Nation has devoted enormous amounts of financial and human resources, in cooperation with the Council and Bonneville, to rebuilding and restoring decimated fishery resources. While the cooperative mitigation of impacts to fisheries resources and treaty-reserved rights has had some successes, it is still very much a work in progress.

We are gratified to note the Council's continued support in its draft recommendations for most Yakama Nation priority projects. However, we are dismayed by the Council's apparent intent to redirect funds from what have been shared management priorities for impact mitigation toward a new set of priorities that is not uniformly consistent with ours. In particular, we are disappointed by the Council's failure to recommend adequate funding for on-going, highly successful projects, all of which contribute to the Council's Fish and Wildlife Program goal of 5 million adult salmon above Bonneville Dam by 2025. We are alarmed that the Council completely eliminated from its recommendation several long-term projects that reflect management priorities and objectives of the Yakama Nation: Mid-Columbia Coho Restoration, Yakama Reservation Watersheds Project, Klickitat Watershed Enhancement, and Yakama Nation Riparian/Wetlands Restoration.

The Council also recommends reducing management, data and habitat funding associated with the YKFP by 83%. These activities are integral to successful implementation of research, monitoring and evaluation, and operation and maintenance projects conducted by the YKFP. The appropriateness and need for the project, data and habitat management activities has long been recognized by the Yakama Nation, the Council and Bonneville. Reduced support for these activities will diminish the effectiveness of those YKFP projects for which the Council has recommended continued support. Again, we are perplexed that the recommendations do not reflect an awareness of the history and function of the YKFP project and data management structure and the critical, long-understood need for habitat management to complement and improve stock protection and restoration efforts.

The following comments will describe how the Council erred in failing to recommend continued funding for these projects. We also incorporate by reference the comments submitted by letter of October 6, 2006 from the Tribal Council Chairs of the four Columbia River Treaty Tribes.

The Yakama Nation urges the Council to reconsider its recommendations to eliminate or dramatically reduce funding for these significant Yakama Nation projects. The Council should recommend full funding for these projects and join in our efforts to increase funding for mitigation of fish and wildlife impacts from the Federal Columbia River Power System in order to assure that Bonneville meets its obligations under the NPA. If you have any questions or wish to discuss this matter further, please call our Deputy Director of the Natural Resources Department, Philip Rigdon, at 509/865-5121, extension 4655.

Sincerely,

A handwritten signature in cursive script that reads "Lavina Washines".

Lavina Washines, Chair  
Yakama Tribal Council

cc: Olney Patt, Jr. – CRITFC  
Jeff Koenings – WDFW  
Stanley Speaks – BIA Portland Area Office

## General Comments

**The Council's reliance on Bonneville's rate case assumptions as a basis for limiting recommendations on mitigation projects is misplaced:** We recognize that the Council has felt obliged to assume that the maximum annual expense budget to be recommended is \$153 million. The planning figure is based on Bonneville's allocation of \$143 million for annual mitigation expenses in its FY 2007-09 rate case. These assumptions have caused the Council to make agonizing choices among meritorious project proposals. Through our reviews and communications with other fishery co-managers and participants in the hydrosystem biological opinion remand process, it is becoming increasingly clear that \$143 million falls far short of the level that will be needed to address continuing fish and wildlife mitigation obligations as well as anticipated new costs of the FCRPS BiOp implementation. It is also clear that Bonneville has the resources to fund salmon recovery and remain not only financially viable but also well below market rates for power. The Council should not be reluctant to make recommendations that are based on an awareness of these new obligations and Bonneville's ability to pay for them *in addition to, not instead of*, its continuing mitigation responsibilities for non-listed species. The Council would not then be in the position of terminating current, successful mitigation projects to make way for new, untested projects having an ESA nexus. New ESA-related costs are more appropriately part of BPA's cost of BiOp implementation, which can be charged to a separate BPA account established for that purpose in the 2007-09 rate case.

However, some of the agony in the Council's project selection process is self-inflicted. The Council exacerbated a bad situation by treating the 70/15/15 allocation of program funds between anadromous fish, resident fish, and wildlife projects described in the 2000 F&WP as a primary allocation rule, irrespective of (1) presently available means of achieving overall program biological objectives through strict adherence to the 70/15/15 formula, and (2) the earlier priorities for funding determined on a joint basis between the Council, Bonneville and regional fish and wildlife managers. While we acknowledge the Council's wish to fully support the mitigation of resident fish and wildlife, strict application of the ratio would have the effect of shifting about \$12 million away from anadromous fish resource needs at a time when ESA-related costs would be much higher than status quo.

**Project selection criteria employed in preparing the draft recommendations are not transparent:** The F&WP provides general principles for prioritizing funding recommendations by the Council. The Northwest Power Act also calls for a determination of the cost effectiveness of projects in meeting F&WP objectives. In our view, funding recommendations should also be consistent with Yakama Nation plans and activities in the priorities assigned to proposed activities by fisheries managers. As noted, the array of ongoing projects sponsored by the Yakama Nation has been developed over many years of cooperation between—and scrutiny by—the Council, Bonneville and fish and wildlife managers. The projects have been honed over years of continuous review to be highly cost-effective means of accomplishing F&WP objectives. Nothing in the documentation of the draft recommendations articulates the basis for electing to not fund ongoing Yakama Nation sponsored projects. Some of the information in the record suggests that the Council recommendations were based on recommendations from local review groups. At least in the case of the Yakima Basin, the local review board did not assign priorities in determining that proposed projects were consistent with the pertinent subbasin plan.

Moreover, some project objectives do not have a linear correlation with the funded level of effort but instead have a threshold relationship to funding. For example, the great majority of costs in the YKFP Management, Data and Habit project are personnel costs. The project activities are the result of centralization decisions to provide accountability and economies of scale in providing administrative services. The capacity to provide those services has been removed from other Yakama Nation project budgets. Decimation of the MDH project budget eliminates the services that make the YKFP cost-effective. Nothing in the draft recommendation documentation suggests any analysis of such relationships was performed by the Council in recommending only partial funding for Yakama Nation projects. At the same time, the Council's draft recommendations would eliminate smaller but still significant portions of YKFP Monitoring and Evaluation and Operation and Maintenance project budgets, thus exacerbating the consequences of the dramatic reduction proposed for the MDH.

Similarly, nothing in the documentation to date supports assigning a higher priority to projects with an utter absence of a track record of performance. For example, ongoing habitat improvement projects in the Columbia Plateau with proven benefits to ESA-listed steelhead were dropped from the list of projects recommended for funding without meaningful explanation, while new habitat projects were included in the Columbia Cascade province that were submitted by an untested project sponsor with no track record.

We are concerned that rendering recommendations without reference to historical understandings between the Council, Bonneville and fish and wildlife managers or to F&WP and NPA funding priority and cost effectiveness provisions amounts to an amendment of the F&WP without compliance with procedural requirements applicable to program amendments. A critical component of the amendment process is the solicitation of recommendations from Indian tribes, and the assurance of consistency of the program with treaty rights. Past F&WP program amendments have been made in the context of the Yakama Nation's understanding of shared fish and wildlife management priorities with the Council and Bonneville. Changes to funding allocation and priorities without the solicitation of recommendations from the Treaty tribes fails to assure consistency of the program with the tribes' legal rights.

**Benefits of longterm projects will not be realized:** The Yakama Nation projects being recommended for termination or substantial funding cuts represent a substantial investment by the Council and Bonneville in innovative research, habitat improvements, and fish propagation methods that will not be fully realized. The Council and BPA recognized at project inception that these are inherently longterm projects whose fishery benefits and information value compound over time. Termination before the potential benefits of these projects have been fully exploited and made available to the region is not an efficient use of F&WP funds and fails to protect ratepayer investments in rebuilding salmon runs.

**Projects are currently producing measurable benefits:** The Yakama projects slated for termination are producing measurable fishery and information benefits that contribute to Council goals. The Mid-Columbia Coho Restoration project, for example, produces an average of about 6,400 adult coho per year returning above Priest Rapids Dam. The watershed enhancement projects implement numerous habitat improvements annually that restore access to new habitats and improve the quality of existing habitats. These are measurable, on-the-ground, and highly cost-effective projects that efficiently translate F&WP dollars into quantifiable mitigation

objectives. The Council loses an outstanding opportunity to put F&WP funds directly into action by redirecting funds from these projects to new, untested, and uncertain efforts.

**Existing projects attract matching funds:** Projects being considered for termination are among the most effective we know of in attracting federal, state, PUD, and private matching funds. The infrastructure, local knowledge, and track record of success compiled by the Mid-Columbia Coho project and the watershed enhancement projects allows them to compete very successfully in grant and contract competitions. In fact, granting entities often solicit proposals from project staff, and groups with awards in hand may request partnerships with these projects to ensure that funds are effectively spent. This phenomenon attests to the solid reputation for high-quality and successful work that project staff have worked hard to develop, and it reflects well on past Council and BPA decisions to implement these projects. Terminating the projects casts away future opportunities for effective partnerships and cost shares with F&WP funds.

### Specific Comments

The following comments are specific to each ongoing project that was excluded from the Council's draft recommendation.

**1. Yakama Reservation Watershed Project:** The Satus, Toppenish and Ahtanum watersheds are home to approximately half the total spawning abundance—and two of the four distinct populations—of Yakima Subbasin steelhead. Currently, these watersheds are habitat-limited for a variety of reasons.

As in other areas in the Columbia River basin, anadromous fish stocks have declined drastically in these three Yakima River tributaries. Some estimates place the adult steelhead returns to the Yakima Subbasin at ten percent of historical levels (Yakima Subbasin Plan Supplement, p. 8). In March 1999, Middle Columbia River steelhead were listed as threatened under the Endangered Species Act. The importance and cultural significance of steelhead to the Yakama Nation, their status as a threatened species under the Endangered Species Act, and the critical role of Yakama Reservation steelhead populations in steelhead recovery are our rationale for making steelhead the primary focal species of the Yakama Reservation Watersheds Project (YRWP).

Stream channel, floodplain and vegetation restoration projects addressing habitat related limiting factors (i.e., **flow, key habitat quantity, habitat diversity, temperature, sediment load, channel stability**) that were identified in the Yakima Subbasin Plan Supplement (pp. 11-13) form the core of our project. Indeed, this project and the complementary Yakama Nation Riparian/Wetlands Restoration Project (199206200) are the only comprehensive vehicles for recovering two of the four steelhead populations in the Yakima Major Population Grouping. The ultimate goal of the project is to restore the natural hydrologic function of the watersheds as much as possible without causing an overwhelming burden to economic interests (i.e., timber harvest, agriculture) on the reservation. This in turn will increase steelhead spawning success and juvenile survival to outmigration. In addition to steelhead, restoration work will likely benefit other anadromous and resident fish species (e.g., coho salmon, chinook salmon, bull trout, and westslope cutthroat trout) and many wildlife species as well.

The YRWP conducts comprehensive watershed restoration activities that provide direct fishery benefits as well as vital information on habitat management needed by regional fish managers, including (1) headwater wetland rehabilitation; (2) adult and juvenile fish passage restoration; (3) stream channel and riparian area restoration including bringing stream channels back to grade, reconnecting side channels and floodplains, restoring native vegetation in conjunction with riparian and range fencing; (4) minimum instream flow implementation and modification of irrigation water sources and uses to protect fish habitat; along with (5) physical monitoring that includes precipitation, groundwater, discharge from streams, canals and drains, temperature, water quality, fish habitat structure and quality according to accepted protocols; and (6) biological monitoring including spawning ground surveys, snorkel surveys and smolt trapping.

An adaptive approach has characterized our practice of watershed management. The need to face hard facts of science, law and economics, and to gain the trust of landowners and other resource managers have dictated a flexible, opportunistic and incremental approach to solving resource problems. We now have solid advances in managing all three watersheds, and indications from redd, parr and smolt counts that local steelhead populations are responding despite some unfavorable climatic conditions. The listing of steelhead and bull trout provided needed impetus to our efforts, while the environment for seeking change has continued to improve since listing as our skill and credibility have increased. Without this project in place, the recovery goals set out in the Yakima Subbasin Plan and Yakima Subbasin Salmon Recovery Plan cannot be realized.

- **ISRP Programmatic Comments:** *[The] Yakima Reservation Watersheds Project is an example of a good habitat proposal with clear links from objectives to methods to M&E. It includes good organization and presentation of past and proposed work. But the ISRP strongly recommends they publish their work.*
- **ISRP Final Recommendation: Fundable** *This ongoing project is very well described in the proposal. The sponsors are to be commended for the organization and presentation of the past and proposed work. A good qualitative summary of past results and actions with some data on fish abundance/trends based on snorkel surveys and redd counts is presented. Staff are to be commended for their insight, and their patient but assertive approach. However, they are dealing with some fairly sophisticated rehabilitation on a large scale, the results of which should be further evaluated, summarized, and reported in peer reviewed literature such as Restoration Ecology.*

The YRWP has been successful in attracting matching funds to the point that cost sharing opportunities must be critically evaluated for compatibility with project goals. Among others, the NRCS, USFWS, City of Yakima, and Yakima County have expressed interest in, or partnered with, the YRWP in a variety of habitat improvement projects on the reservation or its shared northern boundary, Ahtanum Creek. The YRWP routinely acquires funds from the Pacific Coastal Salmon Recovery Fund (PCSRF) to extend work initiated with F&WP funding.

**2. Klickitat Watershed Enhancement Project:** The overall goal of the Klickitat Watershed Enhancement Project (KWEP) is to restore watershed health to aid recovery of native salmonid stocks in the Klickitat subbasin. Implemented by the Yakama Nation Fisheries Program (YNFP) and funded by BPA, KWEP addresses Yakima-Klickitat Fisheries Project (YKFP) as well as Columbia Basin Fish & Wildlife Program habitat goals. KWEP is the principal ongoing funding mechanism for salmonid habitat conservation and restoration in the subbasin and has been integral to securing outside funding matches exceeding \$3.0 million via public and private partners and grant sources. Actions addressing restoration and protection objectives target stream reaches and watersheds supporting steelhead (*Oncorhynchus mykiss*; ESA- listed as “Threatened”) and/or spring Chinook (*O. tshawytscha*). KWEP-related activities since the 2000 Provincial Review have included creation and acquisition of comprehensive subbasin-wide GIS data, development of a relational database to improve utility of habitat data, development of geographic priorities, correction of fish barriers at 5 sites, collection and planting of over 18,000 cuttings along 14,000’ of bank, fencing of 3000’ of stream, two livestock water developments, stream flow monitoring at 13 sites, assessment of 42 miles of stream and over 110 miles of roads, treatment of 8 miles of road, and completion of in-channel restoration projects totaling over 6000’ feet of stream.

There is an increasing recognition that reversing the dramatic declines observed in anadromous fish populations will require protection, restoration, and enhancement of their habitats. Because habitat conditions at any given point on a stream are a product of the immediate physical site conditions and the conditions of the contributing drainage, an approach that addresses both scales is most appropriate. The overall goal of the Klickitat Watershed Enhancement Project (KWEP) is to restore watershed health and stream habitat to aid recovery of native salmonid stocks in the Klickitat Subbasin. The YN/YKFP Klickitat Watershed Enhancement Project, along with other similar, less-comprehensive efforts, target restoring or enhancing salmonid habitat and the watershed processes that support and maintain habitat throughout the subbasin.

### **Relationship to Recovery Programs and Other Projects**

KWEP addresses the visions and, in part, objectives of the different programs that have arisen to address the widespread nature of the factors limiting salmonid populations. At the broadest scale, the Council’s Fish and Wildlife Program provides guidance and funding for the entire Columbia Basin. In Washington State, the Salmon Recovery Funding Board (SRFB) is the major entity driving salmon recovery funding and planning. Within the larger FWP and SRFB efforts, more localized planning has occurred at the regional and subbasin levels.

#### **Fish and Wildlife Program (FWP):**

The Fish and Wildlife Program’s Vision is stated as (NPCC 2000, pg 13):

*“The vision for this program is a Columbia River ecosystem that sustains an abundant, productive, and diverse community of fish and wildlife, mitigating across the basin for the adverse effects to fish and wildlife caused by the development and operation of the hydrosystem and providing the benefits of from fish and wildlife valued by the people of the region.”*

Within the FWP, YKFP and KWEP staff led the subbasin planning effort within the Klickitat Subbasin which involved agencies, local governments, and stakeholders. The Klickitat Subbasin

Plan's fish and wildlife goals and objectives are summarized in the Executive Summary of the plan (NPCC 2004, pg v):

Goals:

1. *Protect or enhance the structural attributes, ecological function, and resiliency of habitats needed to support healthy populations of fish and wildlife.*
2. *To restore and maintain sustainable, naturally producing populations of spring Chinook and steelhead that support tribal and non-tribal harvest and cultural and economic practices while protecting the biological integrity and the genetic diversity of the subbasin.*

Objectives:

1. *Increase reduced populations of native fish and wildlife to sustainable sizes*
2. *Increase quantity and quality of reduced and degraded habitat to amounts that will sustain native fish and wildlife species*
3. *Decrease fragmentation of habitat to restore connectivity of populations and historic migration routes within and between subbasins*
4. *Increase presence of native plants in their historical distribution and reduce exotic plant distributions*

KWEP operates with the intent to assist in generating population responses in the Klickitat Subbasin Plan (goal #2 and objective #1) as well as those outlined in the biological performance objectives of the Council's FWP. KWEP directly addresses the first goal and the latter three objectives from the Subbasin Plan and the following environmental characteristics objectives proposed in Appendix E (NPPC 2000):

1. Protect the areas and ecological functions that are at present relatively productive for fish and wildlife populations to provide a base for expansion of healthy populations as we rehabilitate degraded habitats in other areas.
  - Protect and enhance habitats and ecological function to allow for the restoration of natural population structure, by allowing for the expansion of productive populations and by habitat restoration actions that connect weak populations to stronger populations.
2. Protect and restore freshwater habitat for all life history stages of the key species. Protect and increase ecological connectivity between aquatic areas, riparian zones, floodplains and uplands.
  - Increase the connections between rivers and their floodplains, side channels and riparian zones.
  - Allow patterns of water flow to move more than at present toward the natural hydrographic pattern in terms of quantity, quality and fluctuation.
3. Habitat restoration may be framed in the context of measured trends in water quality.
  - Increase the correspondence between water temperatures and the naturally-occurring regimes of temperatures throughout the basin.
  - Significantly reduce watershed erosion where human activities have accelerated sediment inputs.
4. Increase energy and nutrient connections within the system to increase productivity and expand biological communities.
5. Allow for biological diversity to increase among and within populations and species to increase ecological resilience to environmental variability.

- Expand the complexity and range of habitats to allow for greater life history and between species diversity.
- Manage human activities to minimize artificial selection or limitation of life history traits.
- Restoring habitat and access to habitat that establishes life history diversity is a priority.
- Increase the abundance and range of existing habitats and populations.
- Expand and connect existing habitat pockets to facilitate development of resilient population structures for aquatic communities.

As part of its YKFP role, KWEP has played an integral role in Washington State Salmon Recovery (SRFB) planning in the Klickitat Subbasin by participating as a member of the Klickitat Technical Advisory Group (KTAG). In 2004, the KWEP project specialist was recognized with a “Most Valuable Player” award for his role in development of the Klickitat Lead Entity’s Salmon Recovery Strategy (Klickitat Lead Entity 2004). The KWEP project specialist has also participated as an invitee of the Governor’s Monitoring Forum.

Without watershed and habitat enhancement in the Klickitat Subbasin, “sustainable” and/or “self-supporting” native fish populations cannot be achieved. As such, goals and objectives from the 2000 Fish and Wildlife Program, Klickitat Subbasin Plan, and Yakima Klickitat Fisheries Project stated above will not be met if F&WP funding is discontinued.

### Partners and Cost-Share

KWEP is an integral part of the YKFP and Washington State SRFB recovery efforts in the Klickitat subbasin. The partnerships formed with federal, state, and local governmental entities, regional fisheries enhancement groups, conservation districts, and private entities form a broad base for conservation in the subbasin.

Since 2000, KWEP projects have involved at least \$2,546,059 from matches in the form of both YN- and partner-administered funds as well as in-kind donations. During that same time period KWEP expensed about \$1,502,113 in BPA-funds. **This represents a non-BPA match of roughly \$1.69 for every BPA dollar invested.** Through FY09, KWEP currently has partnerships with confirmed funding for 13 different projects totaling \$2,724,692 with another \$542,000 in matching requests pending. This represents almost a 1:1 confirmed match to the funding requested in the FY07-09 KWEP proposal. Of this total, \$1,499,458 will be administered directly by KWEP and \$1,577,784 will be administered by project partners.

In implementing its watershed approach to restoration, enhancement, and protection, KWEP has formed numerous partnerships including:

• Columbia Land Trust	• Washington Dept. of Fish & Wildlife
• Mid-Columbia Regional Fisheries Enhancement Group	• Washington Dept. of Natural Resources
• Yakama Forest Products	• Yakama Nation Water Program
• BIA Forestry & BIA Range Program	• Underwood Conservation District
• Washington State Parks	• Central Klickitat County Conservation District
• Klickitat County	• private individuals
• Yakama Nation Forest Development	• Yakama Nation Wildlife Program

Failing to fund KWEP effectively pulls the rug from under these partnerships that have taken years to build.

Given the project's history (2000-2006) of matching every BPA dollar with \$1.69 of non-BPA funds, it is highly likely that the level of match for FY07-09 will increase accordingly. KWEP is the cornerstone to leveraging funds for watershed and habitat restoration in the Klickitat Subbasin. If KWEP is not funded, the aforementioned funding commitments will be jeopardized and the ability to leverage additional monies in the future practically eliminated.

## **Summary**

The Klickitat Watershed Enhancement Project addresses goals and objectives of the Power Council's Fish and Wildlife Program. KWEP also address numerous local and regional recovery efforts associated with the SRFB process, CRITFC's Tribal Restoration Plan, and the Yakima-Klickitat Fisheries Project. It is impossible to meet goals for sustainable naturally-spawned salmon and steelhead populations in the Klickitat Subbasin without addressing the habitat and watershed factors that contributed to the population decline in the first place. The degree of cost-sharing exhibited by KWEP represents increased economic efficiency from the Council's perspective. At best, failing to fund KWEP will result in incomplete achievement of biological goals and objectives and result in greater costs to the Council.

### **3. Mid-Columbia Coho Restoration Project**

The MCCRCP has been part of the Fish and Wildlife Program since 1996, when the Council identified it as one of 15 *high-priority* projects for the Columbia Basin and incorporated it into the Program through measures 7.1h, 7.4A, 7.4f, and 7.4O. Since 1996 the Council and BPA have invested nearly \$13.8 million to restore this functionally extirpated stock to watersheds in the mid-Columbia area that historically supported abundant coho populations. The factors that made this a high priority of both the Yakama Nation and the Council in 1996 have not changed.

The MCCRCP is specifically identified in the Columbia River Fish Management Plan and interim management agreements that followed expiration of the Plan as binding orders of the *U.S. v Oregon* court. The Council has recognized the significance of the *U.S. v Oregon* process in the development and implementation of its F&WP. Indeed, because the *U.S. v Oregon* process promotes exercise of the Yakama Nation's treaty rights, the Northwest Power Act requires that [the] FWP and implementing activities be consistent with *U.S. v Oregon* requirements. See, 16 U.S.C. Sec. 839b(h)(6). In the case of the MCCRCP, compliance with the current *U.S. v Oregon* court order is dependent on continued F&WP funding.

The Wenatchee and Methow subbasin plans both identify coho as a focal species. In the Wenatchee plan, Goal 3 is to “[r]estore, maintain, or enhance fish and wildlife populations to sustainable and harvestable levels, while protecting biological integrity and the genetic diversity of the species.” In the Methow plan, “[t]he goal for coho salmon includes re-establishment of run sizes that provide for species recovery, mitigation of hydro-system losses, and harvestable surpluses.” Many sections of both subbasin plans acknowledge the importance of coho to the

subbasins. The following excerpts are only a sample of how coho have been incorporated into the plans. To highlight the issues, we have added emphasis within the quotations.

- **Methow Subbasin Plan excerpts:**

*Page xxi, Section 1 Fisheries Management:* **“The goal for coho salmon includes re-establishment of run sizes that provide for species recovery, mitigation of hydro-system losses, and harvestable surpluses.”**

*Page 33, section 3.3.1 Fish Focal Species: Population Characterization and Status:* “A focal species has special ecological, cultural, or legal status and represents a management priority in the Methow subbasins and, by extension, in the Columbia Cascade Ecoprovince. Focal species are used to evaluate the health of the ecosystem and effectiveness of management actions.”

*Page 79 Section 3.4.6 Fish Focal Species, Rationale for Selection – Coho:* “Historically the Methow River produced more coho than chinook or steelhead (Craig and Suomela 1941). Mullan (1984) estimated that 23,000-31,000 coho annually returned to the Methow River. Upstream of the Yakima River, the Methow River and Spokane River historically produced the most coho, with lesser runs into the Wenatchee and Entiat (Mullan 1984).”

“Coho salmon prefer and occupy different habitat types, selecting slower velocities and greater depths than other focal species: Habitat complexity and off-channel habitats such as backwater pools, beaver ponds, and side channels are important for juvenile rearing making coho good biological indicators of these areas.”

*Page 79 Section 3.4.6 Fish Focal Species, Coho – Representative Habitat:* “Currently, coho salmon returning to the Methow Basin are spawning in the mainstem Methow River and small tributaries such as Gold Creek. **As the recovery program continues, reintroduction of coho to tributaries within the Methow Basin will aid in species dispersal.**” This statement indicates that continued coho reintroduction is expected in the Methow Subbasin Plan to ensure adequate species dispersal within the Methow Subbasin.

*Pages 301-353 Section 5.5 Assessment Unit Summaries:* Within section 5.5 coho salmon are specifically listed as a focal species for the following Assessment Units: Lower Methow, Middle Methow, Upper-Middle Methow, Upper Methow/Early Winters/Lost River, Black Canyon/Squaw Creek, Gold/Libby Creeks, Beaver/Bear Creeks, Lower Twisp River, Upper Twisp River, Upper Chewuch River, Lower Chewuch River, Goat/Little Boulder Creeks. As a focal species in these Assessment Units, much of the recommended restoration strategies should improve habitat for coho. The geographic distribution of coho as a focal species within the Subbasin Plan is consistent with the proposed coho master plan.

- **Wenatchee Subbasin Plan excerpts:**

*Page xxi, Section 2.5.2 Key Findings: Aquatic:* “Limiting factors are defined as a habitat element that limits the biological productivity and/or life history diversity of a focal species. **The focal species selected for this assessment include spring chinook salmon, late-run chinook salmon, sockeye salmon, coho salmon,** steelhead trout, bull trout, westslope cutthroat trout, and pacific lamprey.” As defined in the plan “focal species will be used to evaluate the health of the ecosystem and the effectiveness of management actions.”

*Page 27, Section 3.3.3 Guiding Principle 10:* **“Restoration of individual populations may not be possible without restoration of other fish and wildlife populations with which they co-evolved.”** We interpret this statement from the 10<sup>th</sup> guiding principle to directly apply to the reintroduction of coho salmon (functionally extirpated species) which co-evolved with all the other focal species in the basin. The plan acknowledges that restoration of ESA species may not be possible unless the ecosystem and co-evolved fish assemblage is restored.

*Page 27, Section 3.3.3 Guiding Principle 11:* “Reintroduction [coho] or supplementation [chinook and steelhead] programs for fish and wildlife should concentrate on specific environments within the basin, **selection of an appropriate stock for reintroduction to that environment or locally adapting a donor stock [coho] where a local stock no longer exists.**” This statement from the 11<sup>th</sup> guiding principle describes the strategies of the coho reintroduction program. YN’s coho reintroduction program is the only program in the basin where a local stock is not available and is “developing a locally adapting donor stock.” This guiding principle supports YN’s reintroduction approach.

*Page 28, Section 3.3.3 Guiding Principle 12:* “At some point along the scale from intact population to former populations that have had entire metapopulations extirpated from the basin and adjacent basins, emphasis on recovery actions is better focused on rebuilding population structure than on habitat restoration. If the goal of cost-effective restoration is to be achieved, subbasin planners need to assess the optimal mix of habitat restoration and population structure restoration to achieve biological goals.”

*Page 29 Section 4.1 Focal Species – Table 12:* Within table 12, coho are shown as a focal species with a representative habitat of “lower mid-elevation mainstem and tributaries, side channel and backwater environments.” Lower and mid-elevation mainstem includes the Wenatchee River from the mouth to the Lake. Tributaries include Nason Creek, Chiwawa River, White River, and Little Wenatchee.

*Page 305 Section 7.8.16 Summary of Near-term Opportunities by Focal Species – Coho Salmon:* “**Continued development of a locally adapted broodstock is essential to ensure future populations of naturally spawning coho salmon in the Wenatchee River.** Increased habitat diversity (e.g. off channel habitat, increased structural diversity, etc) primarily in Nason Creek, Peshastin Creek, Mission Creek, and the lower Wenatchee River would increase the success of naturally spawning coho and increase productivity. Evaluation of migrational delays in Tumwater Canyon could improve extreme flow passage conditions for adults migrating to the upper Wenatchee subbasin.”

These passages clearly state that the continued development of coho broodstock is not only consistent with subbasin plans but ‘essential’ for the restoration of a properly-functioning ecosystem for coho and other fish and wildlife in the mid-Columbia tributaries.

The Council should protect its investment in a successful fish restoration project that currently produces measurable contributions to the Council’s F&WP goals. The project has met every goal and scientific challenge posed to date by policy makers or independent and agency scientists. It has significantly increased salmon numbers to the Columbia Cascade Province, and significant numbers of natural-origin adults are now returning and successfully spawning. An average of about 5400 adult coho annually return to mid-Columbia tributaries treated by the MCCRCP, based upon fish counts at Rock Island Dam in 2000-2005. If the program continues, it will be a key contributor in helping the NPPCC meet its goal of 5 million fish in 25 years.

Perhaps most importantly, the project is developing ground-breaking new information on potential uses of hatchery fish for restocking vacant or underutilized habitats. Region wide, salmon recovery experts have long been concerned about the biological efficacy of hatchery fish spawning in the wild. The MCCRCP addresses this question directly out of the necessity to initiate coho restoration in the mid-Columbia using a lower Columbia River donor stock with a long history of hatchery domestication. The project has met this challenge with innovative broodstock collection and fish culture techniques that focus on accelerating the renaturalization of the hatchery stock. Within the past ten years, careful broodstock development has produced a naturally-adapting stock that is beginning to show levels of natural production comparable to spring chinook in the Wenatchee basin. We are now documenting the productivity of F2 offspring of naturally spawning adult coho produced in the program. Egg-to-smolt survival for these fish has ranged from 8.2% – 9.8%. These values comport well with egg to smolt survivals documented for Chiwawa River spring chinook (mean = 9.86%, range 4.7%-18.1%). Estimates of redd counts, natural smolt production, counts of naturally-produced adult coho, and smolt-to-adult survival are shown in Figures 1 & 2.

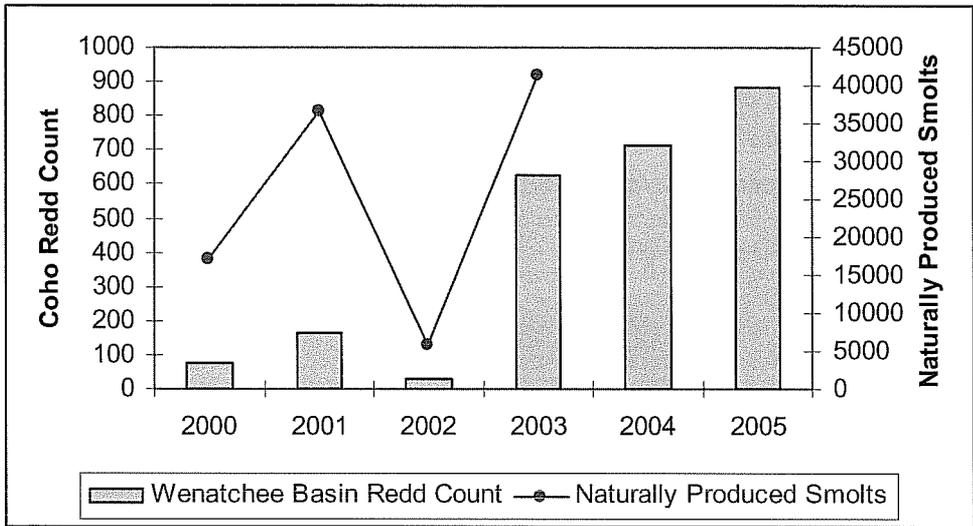


Figure 1. Wenatchee basin redd counts and production of natural-origin smolts

The program has fully transitioned from the use of lower Columbia River broodstock to a local broodstock, and we are currently collecting second-generation mid-Columbia adults to continue the broodstock development process.

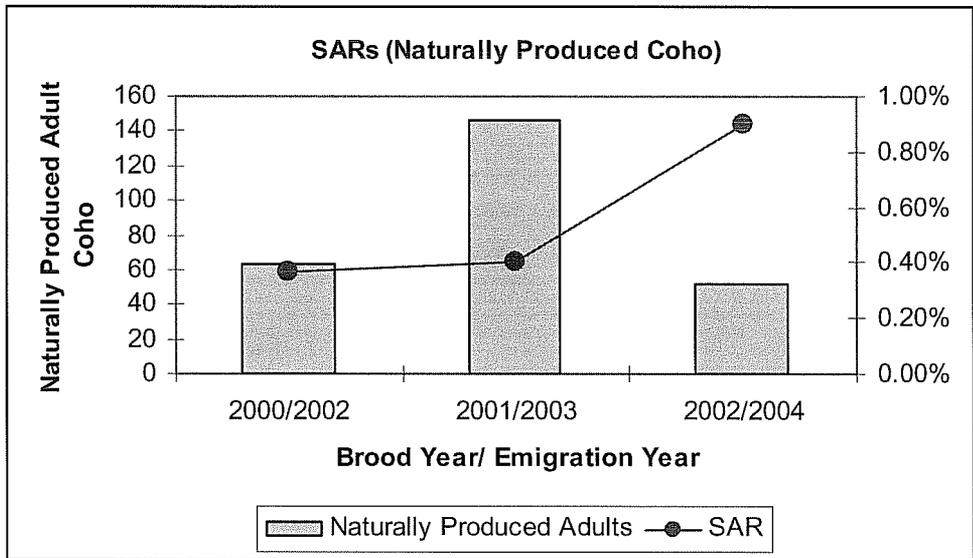


Figure 2. Counts of natural-origin adults and smolt-to-adult survival rates.

Figure 3 displays the increasing trend in coho abundance above McNary Dam, which is largely production from mid-Columbia tributaries. We expect the numbers to this trend to continue if the MCCRCP remains operational.

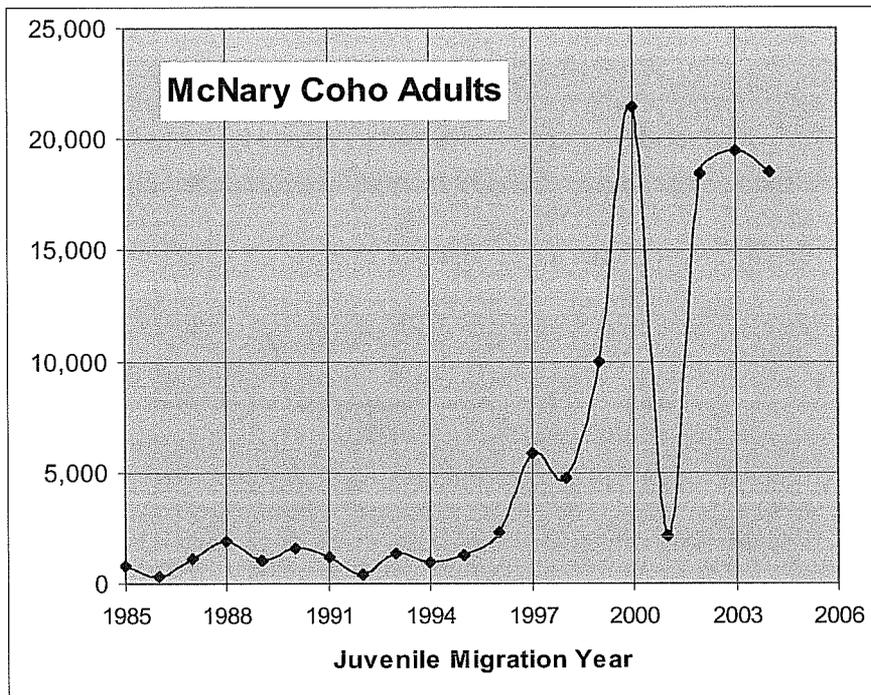


Figure 3. Adult coho counts from McNary Dam 1985-2005. Counts likely will drop to pre-1997 levels if the Mid-Columbia Coho Restoration program is discontinued

The MCCRCP will attract significant cost shares from the mid-Columbia PUDs that are bound by the terms of the mid-Columbia HCP to mitigate for coho upon a finding that a continuing production program or a naturally reproducing population has been established. The terms specific to coho mitigation are or will be written into new FERC licenses to operate the Priest Rapids, Rock Island, Rocky Reach, and Wells hydroelectric projects. Clearly, PUD funding for coho mitigation is jeopardized without continued base funding from the F&WP. The following excerpts describe the terms of the HCP agreements:

- Rock Island HCP:** “Hatchery compensation for coho will be assessed in **2005** following the development of a continuing coho hatchery program and/or the establishment of naturally reproducing population of coho (by an entity other than the District and occurring outside of this Agreement). The Hatchery Committee shall determine whether a hatchery program and/or naturally reproducing population exists. Should the Hatchery Committee determine that such a program exists, then (1) the Hatchery Committee shall determine the most appropriate means to satisfy the 7% hatchery compensation requirement for coho, and (2) the District shall have the next juvenile migration to adjust juvenile protection Measures to accommodate coho. Thereafter, the Coordinating Committee shall determine the number of valid studies (not to exceed 3 years) necessary to make a juvenile phase determination. The programs selected to achieve NNI for coho will utilize an interim value of project survival, based upon a Juvenile Project Survival estimate of 93%, until juvenile project survival studies can be conducted on coho.”
- Rocky Reach HCP:** “Hatchery compensation for coho will be assessed in **2006** following the development of a continuing coho hatchery program and/or the establishment of a **Threshold Population** of naturally reproducing coho **in the Methow Basin** (by an entity other than the District and occurring outside of this Agreement). The Hatchery Committee shall determine whether a hatchery program and/or naturally reproducing population is present in the Methow Basin. Should the Hatchery Committee determine that such a program **or population** exists, then (1) the Hatchery Committee shall determine the most appropriate means to satisfy the 7% hatchery compensation requirement for **Methow Basin** coho, and (2) the District shall have the next juvenile

migration to adjust juvenile protection Measures to accommodate **Methow Basin** coho. Thereafter, the Coordinating Committee shall determine the number of valid studies (not to exceed 3 years) necessary to make a juvenile phase determination. **Programs to meet NNI for Methow Basin coho may include but are not limited to: (1) provide operation and maintenance funding in the amount equivalent to 7% project passage loss, or (2) provide funding for acclimation or adult capture facilities both in the amount equivalent to 7% juvenile passage loss at the Project.** The programs selected to achieve NNI for Methow Basin coho will utilize an interim value of project survival, based upon a Juvenile Project Survival estimate of 93%, until juvenile project survival studies can be conducted on Methow Basin coho.”

- **Wells HCP:** “8.4.5.1 Coho. Compensation for Methow River coho will be assessed in **2006** following the development of an anticipated long-term coho hatchery program and/or the establishment of a Threshold Population of naturally reproducing coho in the Methow Basin. The Hatchery Committee shall make a determination on whether a hatchery program and/or naturally reproducing population of coho is present in the Methow Basin (by an entity other than the District and occurring outside this Agreement). Should the Hatchery Committee determine that such a program and/or population exists, then the Hatchery Committee shall determine the most appropriate means to satisfy NNI for Methow Basin coho. Programs to meet NNI for Methow Basin coho may include but are not limited to: 1) provide operation and maintenance funding in the amount equivalent to 3.8% project passage loss or 2) provide funding for acclimation or adult collection facilities both in the amount equivalent to 3.8% juvenile passage loss at the Wells Project. The programs selected to achieve NNI for Methow Basin coho will utilize an interim value of project survival, based upon the three-year average Juvenile Project Survival estimate of 96.2%, until project survival studies can be conducted on Methow Basin coho.”
- **Priest Rapids HCP:** “Compensation for coho in the Wenatchee, Entiat and Methow river basins will be assessed in 2006 following the development of an anticipated long-term coho hatchery program and/or the establishment of a threshold population of naturally reproducing coho in the three basins mentioned. The Hatchery Committee shall make the determination on whether a hatchery program and/or naturally reproducing population of coho is present in any or all of the three basins (by an entity other than the District and occurring outside this Agreement). Should the Hatchery Committee determine that such a program and/or population of coho exist in any or all of the three basins, then the Hatchery Committee shall determine the most appropriate means to satisfy NNI for the Wenatchee, Entiat, and Methow river basins. Programs to meet NNI for the Wenatchee, Entiat and Methow river basins may include but are not limited to; 1) Provide operation and maintenance funding in the amount equivalent to 14% (7% per project) juvenile project passage loss or 2) provide funding for acclimation or adult collection facilities both in the amount equivalent to a total of 14% for both Grant projects. The programs selected to achieve NNI for the three basins will utilize an interim value of project survival, based upon the three-year average juvenile project mortality of 7% per project, until project survival studies can be conducted on coho programs/populations in the Wenatchee, Entiat, and Methow basins.”

In addition to the prospective PUD cost shares pursuant to the HCP agreements, the MCCRCP currently acquires costs shares from the USFWS for costs associated with incubation and rearing of gametes and juveniles. Cascade National Fish Hatchery (NFH) incubates and rears 700,000 Mid-Columbia brood coho annually. Annual operating costs total \$606,000, of which \$249,000 is provided from Mitchell Act funds for the Mid-Columbia coho restoration effort. Willard NFH incubates and rears 500,000 mid-Columbia brood coho annually, which is the total production at this facility. The \$124,000 of Mitchell Act funds contributed by the MCCRCP allows this hatchery to continue operations.

The project has been forced by funding level and availability of facilities to be extraordinarily cost-effective in the use of F&WP funds. Approximately 85% of eggs and juveniles are reared in existing hatcheries. Project staff have designed an innovative system of multiple, low-cost natural acclimation ponds located adjacent to coho habitat. The biological effectiveness of these ponds, and the minimal “footprint” they leave in sensitive floodplain habitats, has attracted the attention of numerous agencies with fish production responsibilities. The development and testing of this “minimalist” technology is one example of benefits provided by the MCCRCP for use by the region.

The Council acknowledges in Guiding Principle 10 of its guidance to sub-basin planners that, *“Restoration of individual populations may not be possible without the restoration of other fish and wildlife populations with which they co-evolved.”* We interpret this statement to apply directly to the reintroduction of coho salmon (extirpated species) which co-evolved with all the other focal species in the basin. The Plan guidance acknowledges that restoration of ESA-listed species may not be possible unless the salmonid ecosystem, including co-evolved fish assemblages therein, is restored. The restoration of coho to mid-Columbia tributaries implies broad social and ecological benefits that may be overlooked in the project review process. The Endangered Species Act describes extinct stocks as being of “aesthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people.” The MCCRCP represents a rare opportunity in the Columbia Basin to reintroduce a species that is missing from its historic range. The justification for developing and implementing habitat conservation measures in the region is reinforced by the restoration of coho which, as a non-ESA-listed species, may provide utilization benefits to the public. Also, because coho occupy different microhabitats within a watershed from other fish species (utilizing small, low-gradient streams for part of their life history), coho habitat protection will result in a more complete conservation effort. Additional environmental benefits of coho reintroduction include the deposition of marine-derived nutrients to watersheds at critical times, the buffering of predation impacts on other salmonid species, and other trophic cascade benefits.

**ISRP Comments on the Mid-Columbia Coho Master Plan:** *“The ISRP finds the Master Plan to be a commendable draft and an excellent start to producing a final Master Plan for reintroducing coho salmon to the Wenatchee and Methow subbasins in the mid-Columbia River basin. The ISRP compliments the plan's team for their efforts. The ISRP is particularly pleased to see the recognition of the need for habitat restoration to accompany artificial production activities if self-sustaining coho salmon are to be reestablished in these subbasins. A further strong aspect is the use of the Entiat River subbasin as a reference site in trying to differentiate the effects of activities within the Wenatchee and Methow subbasins from the general effects of regional environmental and marine variation.”*

Broad regional co-manager support for the MCCRCP is displayed in the four policy letters of endorsement from NOAA Fisheries, WDFW, and USFWS that are attached as appendices to these comments.

Finally, it is not clear why the MCCRCP was moved for undisclosed reasons from the capital budget to the expense budget in 2005. This action both increased the competition for funding in the direct program and may have biased the provincial allocation process, which was based on the average distribution of direct program funds in 2003-2005. If the MCCRCP capital costs in 2003 and 2004 were not included in the average, then the estimated average disbursement to the Columbia Cascade province was biased low. Particularly in view of the projects submitted by the Colville Confederated Tribes that are funded from the capital budget, it is difficult for us to perceive the basis for moving the MCCRCP from capital to expense. We recommend the Council include the MCCRCP in its recommendations for funding from the capital budget.

#### **4. Yakama Nation Riparian/Wetlands Restoration**

This comprehensive project protects and restores floodplain habitats along anadromous fish-bearing streams in the heavily-impacted agricultural portion of the Yakama Reservation. This geographic area represents the majority of extant habitat for two of the four populations of ESA-listed steelhead in the Yakima River MSG. The Yakima Subbasin Assessment identified the loss of floodplain function in these watersheds as a critical factor limiting the production and survival of salmonid and wildlife populations. The protection and restoration of the floodplain habitats in these watersheds has been identified as high priority in the Fish and Wildlife Management Plan portions of the Yakima Subbasin Plan. Overall objectives include the protection, restoration and management of 27,000 acres of floodplain lands along the Yakima River, Satus, and Toppenish creeks, all of which support ESA-listed steelhead. The project supports aquatic habitat protection and improvement by securing large contiguous lands, along with their associated water rights which are then used to maintain instream flows. Restoration of these lands emphasizes the return of normative hydrologic processes and ecological functions. Management and monitoring activities ensure that the restored conditions persist into the future. This project only funds the land securing, restoration planning, and management/monitoring aspects of this comprehensive effort. Large-scale restoration activities on the secured properties are funded through extensive partnerships. Over the project lifetime, these non-BPA partnerships have provided nearly a dollar-for-dollar match to F&WP investments. Bonneville Power Administration is contractually obligated to provide O&M and M&E funding for the life of this project.

This is one of the most cost-effective floodplain habitat projects in the northwest. Approximately 1,000 - 3,000 acres are secured each year at an average cost of less than \$400/acre. Since 1994 over 20,000 acres have been secured into the project. This includes more than 115 miles of steelhead-bearing creek, river and side channels. Irrigation water rights are also secured with these properties and allowed to remain in-stream. Water rights for hundreds of acres have been secured, including all of the water rights on Satus Creek. At the current rate of implementation, 27,000 acres of critical floodplain habitats should be protected and restored by the end of 2012.

This project and the Yakama Reservation Watersheds Project (199603501) compliment each other in providing comprehensive, top to bottom watershed restoration in the most important steelhead-producing watersheds in the Yakima Subbasin. The on-Reservation watersheds together represent an average of 50% of the total steelhead spawning in the entire Yakima Basin. The project was listed as High Priority by the Yakima Subbasin project review panel. This project is consistent with and implements all of the Tier1 habitat limiting factors as described in the Yakima Subbasin Plan Supplement, table 2, pg.11-13. It implements the priority wildlife riparian wetland habitat objectives in the highest priority locations (pages 22-23). It implements fisheries objectives in Tables 7, 9-16, and 18 (pages 25-34). It is difficult to understand how implementation of the Yakima Subbasin Plan and restoration of Yakima basin steelhead can be achieved without this project.

**ISRP Comments: Fundable.** *“This is an important project working toward habitat conservation goals in some critical areas of the Yakima Basin. Missing from the proposal was evidence of a strong biological monitoring component. The proposal stated that their website will be updated in FY07 to include all the biological monitoring results, but reviewers requested an interim synthesis to show benefits to focal species and demonstrate restoration is working. The proponents have gone to a lot of effort to provide a detailed response. The*

*response effectively provided detail on M&E procedure and results of management activities on one management unit encompassing 440 acres (of a total of 20,000 acres in the project). The monitoring protocol described is that used on all management units. Impressive changes were shown in the time-series of aerial photos, photopoints, habitat cover type data, and bird density/diversity summaries. Those M&E methods seem appropriate and the data resulting indicates the project is achieving its wetland-related goals. If this is representative of what has been done and is planned for other management units, this portion of project could serve as a model for riparian/wetlands restoration. Unfortunately, only one table gave data on fish use of the restored habitat. On the other hand, only one goal is directly concerned with anadromous fish. The Yakama Nation Fisheries Program has a fish-monitoring program underway, and it would be in the proponent's best interest to include more fisheries information, although reviewers appreciate there are often indirect (but important) ties that can be assessed using habitat measures. They are encouraged to include more fisheries information in their next submission."*

## **5. Nelson Springs Monitoring and Evaluation Facility**

Suitable building space is necessary to house monitoring, evaluation and data management personnel and equipment. The current Nelson Springs facilities are substandard and not conducive to accomplishing the monitoring, evaluation and data management project objectives. The significance of these activities to regional programs is described in YKFP Monitoring and Evaluation (M & E), Project Number 1995 063 25; and YKFP Data, Management, and Habitat, Project Number 1988-120-25.

The cost of appropriate leased space would have to be absorbed in the M&E and MDH budgets. A 2001 review compared the costs of leasing or purchasing a comparable existing facility in the Yakima area with the cost of new construction. No other property offered the opportunity for on-site development for fisheries research facilities.

Based on these considerations, the YKFP and Bonneville concluded that a constructed facility on the Nelson Springs site compared favorably to leasing commercial office space for 15 years or more. The Council expressed concerns regarding the cost of the proposed replacement facility. Therefore, the YKFP and Bonneville consulted with modular building manufacturing firms and identified an adequate floor plan for a monitoring, evaluation and data management facility that provides laboratory, data management and office space sufficient for current program needs.

The overall cost estimate in 2005 dollars for the modular facility was \$628,701. The average annual cost of the modular facilities over a fifteen-year period is estimated to be less than the average annual cost of leasing. This is so even if the cost of the modular units is increased by the purchase price originally paid for the Nelson Springs property. Accordingly, the Yakama Nation proposes a Design and Construction project for FY 2007 rather than a long term increase in the M&E and MDH budgets for leasing costs. No information is contained in the draft recommendations to address the elimination from consideration of this facility to support on-going YKFP project activity.

## **6. Yakima Side Channels**

The YSC strives to protect the most productive stream reaches in the mainstem Yakima and Naches Rivers. The targeted reaches were identified through studies of groundwater/surface water interactions, hyporheic functions, historical and present floodplain connectivity and fish resources. This work was funded in part by BPA, and was conducted by the University of Montana and Central Washington University (Yakima Reaches Project, 2002). Working in these high priority areas, the YSC has permanently protected over 960 acres. These parcels are now managed for habitat protection, resulting in continued anadromous fish productivity. Ancillary benefits include habitat for terrestrial wildlife, protection of floodplain function, and pleasing aesthetics through open space preservation.

Acquisition of property or easements is the only way to assure permanent protection of high priority riverine habitats, critical to support the spawning, rearing, and foraging viability of anadromous fish populations. History is replete with examples of regulatory failures in the Yakima Basin, with unmitigated habitat loss as a consequence.

Since 2002, the YSC has not been allocated funding through either the BPA capital or expense account. Instead, YSC has had to compete for limited within year funding. The goals, function, and success of YSC cannot be accomplished using a within year funding process, due to the time sensitive nature of the funding (short-lived availability of funds) and the lack of assurance that funding will be granted. Pre-acquisition and landowner negotiations take upwards of six months to conduct, and many times take longer. If it takes four to five months to go through the Within Year process, that leaves only eight or less months (typically much less, given delays in contracting) to complete the pre-acquisition work, conduct negotiations; and find and secure matching funds for the acquisition. The Council's draft recommendation would perpetuate these difficulties at the expense of necessary habitat protection efforts.

As per the YSC 07-09 funding request, a set dollar amount per fiscal year is needed, so that YSC can perform adequately. We believe that the YSC project has proven itself effective and delivers measurable benefits towards enhancing anadromous fish populations.

## **7. YKFP Management, Data and Habitat**

The scale of research, monitoring, evaluation, and facility operation and maintenance undertaken by the YKFP demands an administrative infrastructure that provides the necessary accounting, purchasing, personnel management, inventory control, interagency coordination and executive management services. The current administrative structure has developed over the course of the past 12 years and, as with other YKFP projects, has been closely scrutinized for cost-effectiveness in accomplishing fishery management objectives by Bonneville, the Council and fisheries managers.

The achievement of M&E and operations objectives depends implicitly on both the data management and habitat protection elements of the MDH project. Data management activities have made the results of YKFP work accessible and useful to other integrated artificial propagation facilities throughout the region and continue to do so. Successful salmonid stock restoration and reintroduction efforts depend unequivocally on protection and restoration of passage, spawning and rearing habitat. Habitat protection requires

development of relationships with local governments and land owners and oversight of local land use activities in order to identify opportunities for acquisition of appropriate real property interests and related improvements.

The draft recommendation decimates the funding for the MDH activities without accounting for how the necessary management and support services will be provided to assure success of the other YKFP projects. The 83% reduction is proposed by the Council without analysis of which activities should be prioritized based on the F&WP principles and the NPA cost-effectiveness criteria.

## Appendices

1. Letter of support for the Mid-Columbia Coho Recovery Project from Rob Walton, Asst. Regional Director for Salmon Recovery, NMFS
2. Letter of support for the Mid-Columbia Coho Recovery Project from Usha Varanasi, Science and Research Director, Northwest Fisheries Science Center, NMFS
3. Letter of support for the Mid-Columbia Coho Recovery Project from Jeff Koenings, Director of WDFW
4. Letter of support for the Mid-Columbia Coho Recovery Project from Brian Cates, Project Leader for the Mid-Columbia River Fishery Resource Office, USFWS



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

June 12, 2006

Dr. Tom Karier, Chairman  
Northwest Power and Conservation Council  
851 SW Sixth Ave., Suite 1100  
Portland, OR 97204-1348

Dear Dr. Karier:

NOAA Fisheries Service would like to state its support for continuation of the Mid-Columbia Coho Restoration Project in the Wenatchee and Methow subbasins that are currently being reviewed by the Northwest Power and Conservation Council (Council). NOAA Fisheries also recognizes the budget limitations associated with the Fish and Wildlife Program and the Council's need to prioritize projects for funding. It is not our intent to provide advice as to how the Council should prioritize this project against other projects currently under review.

The Yakama Nation has involved our agency from the earliest days of the program, which began in 1996. We have consistently contributed our technical expertise to help design this innovative effort to restore an extirpated species to its former habitat. The collaboration, which also involves Washington Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and several other agencies, is now beginning to achieve promising results, with the development of a local broodstock and gradually increasing numbers of naturally reproducing coho in the Wenatchee and Methow subbasins.

NOAA Fisheries has raised concerns about effects of reintroduced coho on listed spring Chinook and steelhead, and it is important that monitoring and evaluation associated with this program continue. We note that early monitoring results have shown little impact on listed Chinook and steelhead populations. Additional work is needed to confirm this preliminary information as proposed in the Master Plan.

The phased proposal employs the most current theories and methods to develop broodstock collection protocols, release sites, release numbers, and monitoring of natural production. These methods encourage local adaptation and should have the best potential to produce sustainable populations of coho while minimizing adverse effects on other species. We also are pleased that the proposal incorporates thorough analysis of existing habitat and carrying capacity as well as staff to work with other entities in ongoing habitat improvement efforts. We note that, based on our advice, the current plan provides a program that phases itself out in 20 years, so that little or no supplementation will be needed to maintain coho populations in the targeted Upper-Columbia



basins; and that contingencies were developed for each of the phases to alter or discontinue the program if results are unsatisfactory.

Although NOAA Fisheries must focus much of its attention and resources on listed species, we recognize that much can be learned from well-documented research with other species. The Mid-Columbia Coho Restoration Project is demonstrating whether careful hatchery broodstock development can help restore an extirpated population. Information derived from this program may provide valuable information for restoration of other extirpated populations in the northwest. We are encouraged with the results achieved so far with relatively limited resources and fully endorse continuation of the program.

Sincerely,



Robert G. Walton  
Assistant Regional Administrator  
Salmon Recovery Division

cc:  
Lavina Washines, Yakama Nation  
Greg Delwiche, BPA  
Tom Scribner, Yakama Nation



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Northwest Fisheries Science Center  
2725 Montlake Boulevard East  
Seattle, WA 98112-2097

June 13, 2006

Mr. Tom Karier, Chairman  
Northwest Power and Conservation Council  
851 S.W. Sixth Ave., Suite 1100  
Portland, OR 97204-1348

Dear Mr. Karier:

This letter is to express the Northwest Fisheries Science Center's (NWFSC) support for the good science behind the Yakama Nation's ongoing efforts to reintroduce coho salmon into the Wenatchee and Methow Rivers of the mid Columbia. This plan is currently under review by the NPCC.

NWFSC staff have been working with Yakama staff since the reintroduction program began, providing scientific input to the experimental design of the feasibility phase. Yakama staff have been receptive to this input and modified their designs accordingly.

During the development of the long term reintroduction plan, Yakama staff have continued to work with NWFSC staff and have addressed many of NWFSC's technical concerns on earlier drafts of the plan. The result is a reintroduction plan based on sound biological principals, including a phased approach to coho releases and concurrent habitat improvements. The monitoring and evaluation plan will allow continued appraisal of the program and should be able to detect negative impacts of the program to listed fishes. Overall, we believe that program approach and design has the potential to lead to successful coho reintroduction while minimizing risks to listed species.

Sincerely,

Usha Varanasi, Ph.D.  
Science and Research Director





State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207  
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

June 26, 2006

Mr. Tom Karier, Chairman  
Northwest Power and Conservation Council  
851 S.W. Sixth Ave. Suite 1100  
Portland, OR 97204-1348

Dear Mr. Karier,

The Yakama Nation (YN) took the lead during the feasibility study for reintroduction of coho salmon into the mid-Columbia basin (#1996-040-00). The feasibility focus was to:

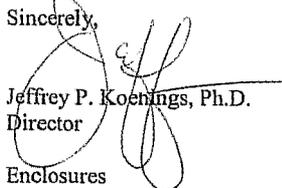
1. Determine if a broodstock could be developed from lower Columbia River stocks that would produce progeny that could return as adults through the much longer distances to the mid-Columbia basins; and
2. Determine if these coho would pose a risk to other federally listed or sensitive fish species.

A technical work group was formed to contribute expertise in the development and reviewing of information from the feasibility study. The results of the feasibility study were encouraging, and the YN took the lead, working closely with the Washington Department of Fish and Wildlife (WDFW) to develop the Master Plan (long-term mid-Columbia River reintroduction program).

Some key features of the Master Plan is the reliance upon existing facilities and programs to support much of the production and monitoring tasks. In addition, there is a strong scientific foundation for monitoring and evaluation to serve as a framework for sound decision-making. The WDFW has been encouraged with the information gained over time, and how well conceived and extensive the components are within the Master Plan to address uncertainties that remain.

The Master Plan represents a comprehensive and scientifically valid approach to returning coho to the mid-Columbia River, and we would encourage continuation of the program.

Sincerely,

  
Jeffrey P. Koehnigs, Ph.D.  
Director

Enclosures

cc: Heather Bartlett  
Dick Stone  
Bill Tweit  
Lew Atkins



United States Department of the Interior  
Fish and Wildlife Service  
Mid-Columbia River Fishery Resource Office  
7501 Icicle Road  
Leavenworth, WA 98826  
Phone: (509) 548-7573  
Fax: (509) 548-5743

Mr. Tom Karier  
Chair  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, Oregon 97204-1348

May 22, 2006

Dear Mr. Karier:

The Yakama Nation requested that the U.S. Fish and Wildlife Service's Mid-Columbia River Fishery Resource Office review the technical merits of the Yakama Nation's Mid-Columbia Coho Restoration Program Master Plan which was recently submitted for funding under the BPA Fish and Wildlife Program. We would like to share our comments on the plan with the Council in the hope that it may aid in their consideration of this project proposal.

Based on review of the Master Plan and its appendices we are supportive of the technical approach and methods that are proposed to restore coho salmon to the Wenatchee River and Methow River. We have participated in the feasibility portion of the re-introduction effort and believe that based on the results observed to date hatchery returns and natural spawning of coho can be restored to these basins, most notably the Wenatchee River Basin. We also believe that there is still some uncertainty associated with the ability of coho to maintain viable, naturally reproducing populations in the Upper Columbia River. Further funding of the re-introduction effort should answer that question. We offer the following additional comments and observations related to different aspects of the Master Plan.

The basic Master Plan approach is to concentrate on utilizing returning coho that originated from earlier returns from the feasibility program and avoid direct use of coho returning to lower Columbia hatcheries. This is the best approach available for use in developing a broodstock that is adapting to upper river conditions. The plan also indicates that limits would be imposed on the number of hatchery fish on the spawning grounds and biologists would maximize use of natural origin fish in hatchery broodstock. These are key aspects of the plan which we support. Some of

the details concerning potential terminal harvest locations and fishing methods are not included in the Master Plan, but the need for that information is probably several years in the future.

Contingency plans and decision processes are outlined in the plan. We do note that in Broodstock Development Phase 1 (BDP1) it indicates that if the BDP1 goals are not met, no corrective action can be made, and the cause is not the result of out of basin effects then a harvest augmentation program should be considered. Since the BDP1 portion of the project is basically similar to a conventional hatchery program, if goals are not met in the upper Columbia areas we agree that a harvest augmentation program providing Tribal harvest benefits elsewhere (including Zone 6) may be a reasonable alternative.

The Master Plan also proposes to co-sponsor a position to acquire funding for habitat restoration projects in the upper Columbia. We note that most of the potential funding sources identified in the plan are already dedicated to the upper Columbia area, and various groups, including the Yakama Nation are actively identifying and implementing projects. However, we agree that a position dedicated to helping coordinate habitat restoration efforts among different entities, actively seeking additional funding sources and focusing on restoration priorities would benefit coho and other species. The value of the position is enhanced if its cost is shared with an outside source of funding, as indicated in the proposal.

A key and laudable feature of the Master Plan is its reliance on existing facilities and programs to provide much of the production and monitoring tasks. This seems to be a reasonable and cost effective approach to making the best use of existing infrastructure and programs to support coho re-introduction. We like this aspect of the plan, but there is also some risk with this approach, especially as it relates to its dependence on outside funding sources for facility maintenance and repair, its vulnerability to potential budget decisions by other agencies and possible hatchery program changes that may occur due to hatchery reform efforts not associated with the coho program. Five to ten years from now the configuration of the coho program and its costs could look significantly different than they appear in the Master Plan.

The Master Plan provides a short chapter on the results of the feasibility studies, but its limited presentation does not provide detailed discussion of some of the issues and data relevant to observations of the current ability of coho stocks to populate upper reaches of these streams where acclimation ponds exist or are planned. According to the most recent draft report available to this office (Murdoch et. al 2005) the overwhelming majority of coho released in the Wenatchee River are returning to areas below Tumwater Dam, this includes many of the fish released in the upper tributaries. Tribal biologists also observed that many females seem to be dropping out lower in the system where habitat is less suitable. Additionally, it appears that smolt survival for fish released from upper tributaries is considerably lower than for those released below Tumwater. All of this may impact the ability of coho to maintain viable, naturally reproducing populations in these upper tributaries in the future, especially if ocean conditions are less favorable than the conditions that prevailed during the feasibility study. Information was provided indicating that the coho originating from previous Icicle Creek releases are returning at higher rates than co-reared lower Columbia coho is encouraging, but more comparisons are needed to see if adaptation to their new habitat is actually occurring. Return rates to the Methow River (Figure 3-2.) are much lower in two of the four years than those to the Wenatchee River. The SAR's are less than 0.2% for hatchery released coho in the Methow River for all four years. These results indicate that establishing a self sustaining hatchery program in the Methow will be more difficult, as indicated by the movement of

some broodstock collection to Wells Dam during the feasibility study. Utilizing mid Columbia brood coho in the Methow River as identified in the plan should help address this situation. The prospects for viable, naturally spawning coho populations in the Methow River are more uncertain than efforts downriver, but this is not unexpected given the basin's location above nine dams.

Superimposition by coho over spring Chinook redds is an issue not yet addressed conclusively by the feasibility study because too few coho have returned into upper tributaries where spring Chinook spawn. The Yakama Nation should consider examining some aspects of this issue in Icicle Creek, where more opportunities exist to examine the specifics of superimposition on spring Chinook.

A number of trapping sites are identified throughout the Wenatchee River Basin, including Dryden Dam and Tumwater Dam which are just a few miles apart on the mainstem. Traps are also identified in tributary streams. At first glance this may seem to be an excessive trapping effort, but it may aid in promoting any local adaptations that may be occurring. The plan anticipates utilizing only tributary traps built for other programs. This approach is cost efficient and reduces the impacts and risks to other species associated with numerous, duplicative weirs and traps.

This plan calls for creation of an earthen pond adjacent to the Chiwawa SFH supplied with second-use water. From a fish cultural and fish health standpoint we recommend that the Yakama Nation pursue first use water, if available.

The M&E component of the plan is extensive and well conceived. One potential weakness in implementation of this approach is the reliance on monitoring by other agencies in some aspects of the evaluation. This may reduce duplication but also adds some risk. If other agencies end or modify those efforts the coho M&E program would have to be expanded or valuable M&E components would be lost. Of special concern is the funding for reference stream comparisons, especially in the Entiat River. At present no reference stream "quality" sampling effort is ongoing in the stream. Sampling may be funded in the future through public utility district monitoring program efforts, but this is not certain. Current smolt trapping by the USFWS is not funded to a level that would accommodate July/August sampling comparisons as envisioned by the coho plan's Non-Target Taxa of Concern effort. Funding for the USFWS smolt trap in Peshastin Creek has been eliminated, ending that effort.

Although we have identified, and the plan acknowledges, several uncertainties associated with the coho reintroduction effort, the Master Plan does represent a comprehensive and valid scientific approach for returning coho to this portion of the Columbia River. In our view, continuation of the coho re-introduction effort is clearly justified and should proceed.

Sincerely,

Brian C. Cates  
Project Leader

cc Jana Grote