

March 27th, 2008

Steve Crow, Executive Director Northwest Power and Conservation Council 851 SW Sixth Avenue Suite 1100 Portland, OR 97204

SUBJECT: Recommendations for amendments to the NPCC Fish and Wildlife Program

Dear Mr. Crow,

The Yakima Basin Fish & Wildlife Recovery Board (Board) is comprised of elected officials from municipal, county and tribal governments in the Yakima Basin. The Board's mission is to "to restore sustainable and harvestable populations of salmon, steelhead, bull trout, and other at-risk fish and wildlife species through the collaborative, economically sensitive efforts, combined resources, and wise resource management of the Yakima River Basin."

We believe that close coordination between the Council, BPA, the Yakima subbasin's fisheries comanagers (the Yakama Nation & WDFW) and the Board is the best means to ensure that effective and efficient fish and wildlife recovery actions are implemented in the Yakima Basin. To that end we offer the following comments in response to your request for proposals for amending the Northwest Power and Conservation Council's Fish and Wildlife Program.

Maintenance of the Central Role of the Yakima Subbasin Plan

The Board's predecessor, the Yakima Subbasin Fish & Wildlife Planning Board, originally convened to draft the Yakima Subbasin Plan for the Council. The Plan was adopted as an amendment to the Fish and Wildlife Program in 2005, and remains the best general guide to fish and wildlife needs in the Yakima Subbasin. The Board is committed to maintaining the Subbasin Plan and actively advocates for its use in efforts to coordinate and focus fish and wildlife recovery efforts in the basin. We look forward to continuing to work closely with the Council to emphasize the importance of the subbasin plan. While we do not see a need to update the Subbasin Plan in the near future, we look forward to taking a lead role in developing future revisions to the plan when it becomes appropriate.

Recognition of the Yakima Steelhead Recovery Plan

The Board is also recognized by the State of Washington as a Salmon Recovery Regioal Organization and was tasked with developing a Regional Salmon Recovery Plan for the Yakima Basin. The Board completed the draft Yakima Subbasin Salmon Recovery Plan in October 2005. This plan details what is needed to recover the two ESA-listed fish species in the Yakima Subbasin (steelhead and bull trout). NOAA recognized this document as an interim recovery plan for the Yakima Basin portion of the Middle Columbia River Steelhead DPS in the spring of 2006. We are currently completing the Yakima Steelhead Recovery Plan, which is a steelhead-specific update of the 2005 Salmon Recovery Plan. The Yakima Steelhead Recovery Plan will be integrated into NOAA Fisheries' ESA-mandated Middle Columbia River Steelhead DPS Recovery Plan. We anticipate release of the Draft NOAA Recovery Plan in July of 2008, with a final version to be adopted by NOAA in late 2008 or early 2009.

The Yakima Steelhead Recovery Plan is consistent with the Yakima Subbasin Plan, but goes into considerably more detail on steelhead biology in the Yakima Basin, sets specific short and long term recovery goals based on NOAA's Interior Columbia Technical Recovery Team's viability analyses for the four steelhead populations in the Yakima Basin, and identifies specific recovery actions that need to be undertaken. This plan and the NOAA recovery plan that it will be incorporated into should be recognized by the Council as the primary guide for steelhead recovery work in the Yakima Basin.

Use of Implementation Schedules and Other Board Products

In order to implement the Subbasin and Steelhead Recovery Plans and coordinate diverse local, state and federal recovery efforts, the Board is developing an implementation schedule for actions identified in the plans and a tracking system to report on progress made by recovery efforts. The Board encourages the Council to make use of these products to guide its efforts in the Yakima Basin.

Board Role in Council Project Review Process

In the 2006 Council project solicitation, the Board conducted a local review of proposals for BPA-funding and assessed the relationship between proposals and the Yakima Subbasin Plan. The results of this review were provided to the Council's Washington Office, and were a key input in the development of the Council's funding recommendations. We look forward to working closely with the Council to provide local input in future project reviews. This coordination will need to be discussed in advance to 1) determine how the Board's review fits into the broader Council process, and 2) ensure the availability of Board resources, primarily staff time, needed to conduct such a review.

Commitment to Key Monitoring Actions

The Council needs to ensure that its Fish and Wildlife Program makes a firm commitment to supporting ongoing monitoring of the status of key fish populations. The Board is currently reviewing ongoing monitoring of the four Middle Columbia River Steelhead populations in the Yakima Basin and identifying what needs to be done in the future to ensure that we have the data needed to track the status of these populations in

comparison with the specific goals developed by the Board using NOAA's Viable Salmonid Population (VSP) framework. BPA funding has played a central role in this monitoring to date, and the results of this monitoring directly inform the future of the Council's Fish and Wildlife Program and BPA's ESA-related commitments. While we strongly support the Council's overall desire to focus its program on on-the-ground actions that directly benefit fish and wildlife, we note that the Council must also continue to support the basic population status monitoring that enables us to track progress towards the Program's goals. We will be working in the Yakima Basin to ensure that the Council's investments in monitoring are effectively coordinated with other state, federal and local monitoring efforts.

Conclusion

In closing, we thank the Council for its ongoing commitment to fish and wildlife recovery in the Yakima Basin and look forward working closely with the Council to ensure its efforts in the Basin support local goals and are well coordinated with other state, local and federal recovery programs. Please do not hesitate to contact the Board's Executive Director, Alex Conley at (509) 453-4104 if you would like to follow up on any of the topics addressed here.

Thank you for the opportunity to comment.

Sincerely,

David Bowen

David B. Bowen

Chairman, Yakima Basin Fish & Wildlife Recovery Board