



YAKIMA BASIN
FISH AND WILDLIFE
RECOVERY BOARD

November 25th, 2008

Mr. Mark Walker
Director of Public Affairs
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204

Dear Mr. Walker:

Thank you for the opportunity to comment on the September 2, 2008 draft of the Columbia River Basin Fish and Wildlife Program (Program). We appreciate the Northwest Power and Conservation Council's effort to amend and update the Fish and Wildlife Program and thank the Council for its invitation to participate in this process.

The Council should be commended for successfully developing a draft document that addresses complex issues in a clear and concise manner. In our March 27th letter to the Council, we recommended that the Program Amendments:

- Maintain the central role of subbasin plans
- Recognize the role of ESA recovery plans for listed species
- Make use of Implementation Schedules based on these plans
- Commit to supporting monitoring that integrates with ESA requirements

We are pleased to see that the draft is generally supportive of all of our earlier input, and offer the following recommendations with the hope of helping the Program further refine these points.

Maintenance and Use of Subbasin Plans

Part of the genesis of the Yakima Basin Fish & Wildlife Recovery Board was the development of the Yakima Subbasin Plan, and we continue to be invested in assuring that the plan is used as a guide to the fullest extent possible and updated as appropriate. To that end we recommend that:

1. The relation of the Program to implementation of subbasin plans would be strengthened by adding this sentence to the Implementing Plans at the Subbasin Level Section on page 102: "The Council will continue to work with its subbasin planning partners to support coordinated implementation of subbasin plans and other related plans and programs in each subbasin, including ESA recovery plans."

2. The provisions in the first paragraph on page 103 relating to updating existing subbasin plans should encourage such updates to include updated and relevant biological objectives and action strategies from adopted or approved ESA recovery plans. This encouragement should include a commitment for Council staff to work with subbasin planners to expedite and streamline the process for submitting updated subbasin plan recommendations to the Council.
3. The relationship between updated subbasin plans and other plans and implementation schedules could be further clarified by adding this sentence on page 103 in the Updating Existing Subbasin Plans Section: “The Council encourages subbasin planning partners to maintain updated multi-year implementation schedules and to evaluate and confirm the consistency of subbasin plan priorities with the priorities of other related plans and programs active in the subbasin.”

Role of ESA Recovery Plans for Listed Species

In addition to developing the Yakima Subbasin Plan, the Board has developed the Yakima Steelhead Recovery Plan, which builds on the Subbasin Plan to provide more detailed objectives and actions for recovering steelhead in the Yakima Basin. This plan has been incorporated by NOAA Fisheries into the federal Endangered Species Act mandated recovery plan for the Middle Columbia River Steelhead DPS. We recommend that the Program recognize the complementary role of the subbasin and recovery plans by adding a sentence on page 8 at the end of the first paragraph in the Implementation and Performance Section that states, “Recovery plans adopted or approved by the federal government will be used to guide implementation of the program.”

Use of Implementation Schedules Based on Subbasin and Recovery Plans

The Yakima Basin Fish & Wildlife Recovery Board is developing an integrated implementation schedule that crosswalks from the strategies and actions identified in the subbasin and recovery plans to the project-level at which habitat work is actually implemented. We believe that implantation schedules of this nature are an important tool for ensuring that recovery and mitigation funds are spent in the most targeted and effective manner possible. We recommend that the program include the following:

1. Insertion of the following sentence in the second paragraph of page 24 in the Basinwide Strategies Section: “The Council will work to develop and maintain multi-year implementation schedules that identify specific actions to be taken that are consistent with approved subbasin plans, federally adopted or approved ESA recovery plans, the 2008 FCRPS Biological Opinion, and the associated Columbia Basin Fish Accords.”
2. The paragraph on pages 105 and 106 should clarify that the Council intends for multi-year implementation schedules to be developed for all subbasins, not just those outside the scope of the FCRPS Biological Opinion (BiOp) or the Fish Accords. The BiOp and Accords are not sufficient for meeting all needs of species affected by the FCRPS, particularly non-listed anadromous or resident fish and wildlife species. The BiOp and Accords do not meet all needs of ESA-listed species identified in recovery plans.

3. In order to assure that the most detailed guidance available is used to justify use of the land acquisition fund, add, “and any associated implementation schedules” to the last item listed under b on p 110.

Support of Monitoring and Research that Integrates with ESA Recovery Frameworks

Confirming that the objective recovery targets set out in ESA recovery plans, the Federal Columbia River Power System Biological Opinion and the recent Fish Accords are met will require careful coordinated monitoring and research that draws on the resources of the Program, NOAA Fisheries, state and tribal comanagers and others. To that ends, we suggest:

1. Adding this sentence to the second paragraph on page 43: “Monitoring, evaluation, research and reporting activities in the program that are related to ESA-listed species will be closely coordinated with related efforts of NOAA Fisheries, U. S. Fish and Wildlife Service and their state, tribal and local partners in recovery planning and implementation.”
2. Adding this sentence under Coordination on page 45: “Identification of program research priorities for ESA-listed species should be coordinated with priorities identified in the research, monitoring and evaluation plans associated with federally adopted or approved recovery plans.”

Other Comments

1. On page 47 at the end of the discussion of annual reports, we recommend adding the statement that “The Council will work with local partners to support development of subbasin level assessments and ensure that these, when available, are integrated into the Council’s reporting process.”
2. The second paragraph under item a on page 26 seems unnecessary in light of the language in the previous paragraph, which would seem to encompass the same concept without calling for an as-yet undefined but separate funding program under the Program umbrella. Removing this paragraph would not preclude coordination between the Program and the federal stronghold initiative being proposed in Congress.

We hope these comments and suggestions are helpful as you revise the draft Program. If you have any questions about our suggestions or our work in the Yakima Basin, please contact our Executive Director, Alex Conley, at (509) 453-4104 or aconley@ybfwrp.org.

Sincerely,



Paul Ward
Chairman