



YAKIMA BASIN
FISH AND WILDLIFE
RECOVERY BOARD

December 17, 2009

To the YRBWEP Working Group,

At the November 30th meeting of the Yakima Basin Fish & Wildlife Recovery Board, the Board discussed the YRBWEP proposal in depth. While the Board actively supports many elements of the Integrated Water Resources Management Plan (IWRMP), our mission statement limits the focus of our operations. The Board choose not to set the undesired precedent of endorsing one set of elements (those directly addressing fish recovery needs that are addressed by the Board's mission), while abstaining from endorsing other elements. Given that 1) the Board of Director's membership is split between entities that are directly represented in the YRBWEP process, and others that have not participated at all, and 2) the mission of our Board is narrower than the mandate of the YRBWEP process, the Board felt most comfortable not taking a formal stance, and asked me to recuse myself from today's vote.

This decision is not meant to undermine the process; indeed, we are encouraged by the degree to which the priorities identified the strategic plans developed by the Board (the Yakima Steelhead Recovery Plan and the Yakima Subbasin Plan) have been incorporated into the draft IWRMP. The Board has invested considerable staff time into supporting the process and ensuring that the elements related to fish recovery are as strong as possible, and we are encouraged by the results to date. We anticipate actively engaging in the ongoing study process, and have attached staff-level comments on the current draft report and the proposed study plan.

Sincerely,

Alex Conley
Executive Director

COMMENTS ON ELEMENTS OF THE DRAFT STUDY PLAN

Task 3 (Quantify instream resource needs by major reach, by season) should begin with a review of previous efforts to characterize instream flow needs and their strengths and weaknesses. Flow proposals should be linked to specific, and where possible, testable, hypotheses about the biological linkages between flows and fish performance. Flow proposals should be developed with participation from fisheries interests within the basin. Development of proposed operational rules for specific flow elements should be encouraged, to understand how water might be used differently from year to year. An explicit, empirically-based adaptive management approach should be developed. Completing this element by March seems optimistic. While initial results may be available by then, work to develop instream flow goals and associated operational guidelines will need to be ongoing. We look forward to participating in this process.

Task 4 calls for developing detailed descriptions for elements and projects identified in the preliminary IWRMP. The YBFWRB is developing an implementation plan for the Yakima Steelhead Recovery Plan that will inform efforts to develop more detailed descriptions of the floodplain and tributary habitat elements of the IWRMP. We look forward to working with the study team on this task, and see promising opportunities for co-convening efforts to develop the tributary and reach level implementation plans described in the draft report in Appendix B.

Task 7 (Evaluate the total ecosystem benefits) will be challenging. We look forward to working with the study team to help integrate existing and new data related to the proposals benefits to fish and wildlife and their habitats.

Task 8 (Climate change): We look forward to working with the study team to 1) improve our understanding of how climate change may impact fish habitats and biology, and 2) assess how those impacts would change how we approach habitat restoration and protection in the Basin.

COMMENTS ON THE DRAFT REPORT:

MINOR CORRECTIONS:

- A) In Attachment A: Workgroup Members, my title should be listed as Executive Director, not Recovery Office Manager
- B) The statement on p.6, line 14-17 of the report that "...three salmon species were extirpated from the basin – sockeye, summer Chinook, and coho; however, reintroduction efforts by the Yakama Nation have established natural and hatchery populations for these species throughout a large portion of the basin," is in fact only true for coho. Sockeye and summer Chinook reintroductions are only now entering the earliest stage of feasibility assessment. Change "these species" to coho, and add reference to initiation of reintroduction for the other two.
- C) Why aren't tier I floodplain priorities identified on the maps (Exhibits 2 to 4)?
- D) On p17, add "for fish" to the end of the sentence that runs from line 5 to 7.

COMMENTS THAT MIRROR THOSE ALREADY MADE BY OTHERS:

- A) The discussion of subordination needs to be cleaned up to ensure factual accuracy, as Roza Irrigation District also noted. My understanding is that power diversions are made by the Bureau, not the districts, as stated on B-7, and that KID does not receive power from the Chandler plant (B-7 and p 7, line 10-11). The parallel but distinct issue of the reduction or elimination of BPA-funding for part of the costs of diversion operations and maintenance does needs to be explicitly noted. The statement on B-7 that one of the goals is to “Reduce diversions by private irrigators that can inadvertently entrap fish in the power plant canals” does not make sense to me. Finally, while promoting it is premature, there should be some analysis of the relative costs and benefits of also subordinating power at Roza during low flow periods outside of the spring migration.
- B) The use of specific allocations of fish and out-of-stream allocations for project elements (e.g. specific allocations for Cle Elum, Wymer and other storage elements) seems premature. These initial placeholder proposals should not discourage more detailed development of operational scenarios for water use during the upcoming study process.
- C) The references to “mandatory adoption of conservation and efficiency BMPs” on p.3, lines 7-8 surprised me, for while the group has discussed the need for incentives that support water conservation, I am not aware of it having endorsed the concept of mandating the adoption of specific agricultural practices.
- A) The reference on p 4, line 16-17, to quantifying fish escapements seems premature. While this would be desirable, it will be challenging on several fronts. I note comments 47 & 49 already address this, and that the draft is to be changed accordingly.

COMMENTS I PRESUME WILL BE ADDRESSED IN THE ONGOING STUDY PROCESS:

- A) On page B-10, in the discussion of KRD/tributary interactions, it should be made clear that the ideal outcome would be to allow natural stream flows to remain instream, rather than supplementing stream flows with canal water. It is unclear why more analysis of in-stream needs is needed, as approximating the natural hydrograph should be a fairly simple matter if alternative sources of water are provided to irrigators.
- B) In recent discussions, it has become evident that there is some confusion about what is and is not included in the proposed On-reservation Habitat Program, and how this relates to the Toppenish Corridor Enhancement element of the existing YRBWEP program. The habitat proposal and associated costs may need to be revised to incorporate the results of the Toppenish Corridor Enhancement Plan currently being prepared by the Yakima Nation.