

GIFFORD PINCHOT TASK FORCE

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Wendy Christensen
US Bureau of Reclamation
Columbia Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

December 10, 2009

Dear Ms. Christensen:

I am writing on behalf of the Gifford Pinchot Task Force and our 4,000+ members. The Task Force works to support the biological diversity and communities of the Northwest through conservation and restoration of forests, rivers, fish and wildlife. While our work was historically based in the Gifford Pinchot National Forest, for the last several years, we have been also been working in other selected areas in Washington and Oregon. We are interested in the Yakima Basin water project because of the potential for significant impacts to vulnerable fish and wildlife species and their habitats.

We are particularly interested in the project's consideration of expanding the storage capacity of the Bumping River reservoir. Expansion of the Bumping River reservoir would be ill-founded for a number of reasons that we hope will compel the Bureau and other project leaders to drop any further study of this action.

First, we believe there should be consideration of the impacts of climate change on fish and wildlife species in the area. While there has been talk of the impact of climate change on irrigators, there has been little talk or study of the impact of climate change on the movements and habitats of fish, plants, and wildlife in the area. We believe a close look at the impacts of climate change on local natural systems (in addition to water levels) is needed if the Yakima water project is to meet with any degree of success. Indeed, the increasing interest of the federal government and agencies such as the US Fish and Wildlife Service¹ in incorporating climate change adaptation into their work is another compelling reason to include such an analysis as plans progress.

The Bumping River is a particularly important area when viewed from a climate change perspective because of the cold meltwaters provided for fish and because of the role the river system plays in draining and connecting the large roadless areas which surround it. Roadless areas have been shown to provide important habitat for sensitive species including wolves and wolverine, and additional activity could negatively impact the movements of these rare species.² In fact, because of the important role this area plays in connecting terrestrial habitats, we believe consideration should be

¹ The United States Fish and Wildlife Service recently released a draft strategic plan for climate change that will dramatically shape the agency's approach to its work: <http://www.fws.gov/home/climatechange/>.

² For example: Noss R. *Maintaining the Ecological Integrity of Landscapes and Ecoregions in Ecological Integrity: Integrating Environment, Conservation, and Health*. Washington DC: Island Press, 2000. Pages 191-208.

given to the removal the Bumping River dam which could reduce activity in the area and restore high quality wildlife habitat.

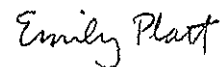
Second, expansion of the reservoir would flood 2,800 acres of important forest habitat, including 1,900 acres of old growth. Again from a climate perspective, these older forests are important for carbon storage.³ Even more important, from the Task Force's perspective, is the habitat these forests currently provide for old growth dependent species. With nearly one quarter of the world's mammals, nearly one third of amphibians and more than 1 in 8 of all bird species at risk of extinction, it is a poor time to pursue actions which would lead to further degradation of habitats on which sensitive species depend.⁴ One obvious local example is the spotted owl. Spotted owl populations continue to plummet, more precipitously than scientists ever predicted, and these owls rely on high quality habitat for their reproduction and survival.⁵ We cannot remove any additional habitat until populations have stabilized if we are serious about recovery.

Third, expansion of the Bumping River reservoir would increase impacts to threatened fish species, most directly affecting bull trout. Once again, rather than expanding the reservoir, we believe consideration should be given to removal of the dam to restore habitat for fish species such as the local populations of threatened bull trout.

We believe the first step in any strategic approach to the growing water supply issue is to exhaust all possible conservation options. From our analysis of the work and study that has been completed to date, this has been a far under-represented strategy. The Task Force would like to see primary focus given first and foremost to all conservation options, and we recommend a careful and detailed study of conservation options that are prioritized over reservoir expansion activities.

Thank you for the opportunity to provide you with these comments. We are happy to talk with you more about climate change and conservation options if that would be helpful.

Thank you,



Emily Platt
Executive Director

³ 2008. Luyssaert S, Schulze E, Börner A, Knohl A, Hessenmöller D, Law B, Ciais P, Grace J. Old-growth forests as global carbon sinks. *Nature* 455: 213-215.

⁴ International Union for Conservation of Nature: www.iucn.org

⁵ 1992. McKelvey R, Lamberson R, Noon B, Voss C. A Dynamic Analysis of Northern Spotted Owl Viability in a Fragmented Forest Landscape. *Conservation Biology* Vol. 6, No. 4, pp. 505-512.

AND

2006. Anthony R, Forsman E, Franklin A, et al. Status and Trends in Demography of Northern Spotted Owls, 1985–2003. *Wildlife Monographs* 163:1-48.