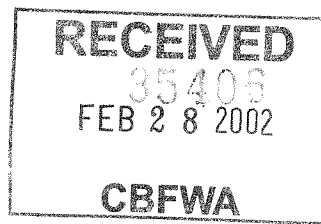


Confederated Tribes and Bands
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To: Jann Eckman, Acting Chairperson, Columbia Basin Fish and Wildlife Authority
From: Virgil Lewis, Sr., Chairman, Yakama Nation Fish, Wildlife and Law and Order Committee
Date: February 12, 2002 *Virgil Lewis Sr.*
Subject: Request to increase geographic scope of work for Lower Klickitat River Riparian & In-Channel Habitat Enhancement Project (BPA Project #: 199705600)

This letter is a request to increase the geographic scope of work for the Lower Klickitat River Riparian & In-Channel Habitat Enhancement Project (LKRRICHP, BPA # 199705600) to encompass the entire Klickitat subbasin. The LKRRICHP was initiated in 1997 to conduct habitat enhancement and develop cooperative habitat projects with private landowners (Sections 7.6 and 7.7, respectively of the NPPC's 1994 Columbia River Basin Fish and Wildlife Program). The current and historic geographic scope includes the mainstem Klickitat River and all its tributaries downstream of river mile 44 (lower basin). The mainstem Klickitat River and its tributary watersheds upstream of river mile 44 are referred to as "upper basin." This letter addresses the three points identified by NPPC and BPA staff members during an October 2001 phone conversation relative to this request: A) justification for the request, B) ISRP comments from the Provincial Review, and C) relation of the proposed change to our original proposal.

- A) We understand the potential reluctance to expand the geographic scope outside the context of a Provincial Review, but request consideration of the following information to facilitate adaptive management. Justification for increasing the geographic scope can be distilled into five main points, discussed below.
- 1) The Klickitat Subbasin is within the Columbia Gorge Province, the first to participate in the Northwest Power Planning Council's Provincial Review Process. In late July 2000, we were given approximately four weeks notice to write a Subbasin Summary, develop proposals for new projects, and resubmit proposals for all existing projects for the following three years. Meeting preexisting workloads while also addressing the needs of the Provincial Review was, to say the least, challenging on such a short timeframe. Consequently, ongoing projects were resubmitted with minimal alterations and without changes in scope.
 - 2) Several months after the Provincial Review deadline, in fall 2000, the Ecosystem Diagnosis and Treatment (EDT) analysis for spring Chinook in the Klickitat subbasin was completed. The analysis indicates that over 50% of the stream miles in the upper basin are in the high or moderately-high restoration benefit categories (Figure 1). In terms of river miles, 41% of potential steelhead habitat and 62% of potential spring Chinook (Table 1), including nearly 100% of wild spring Chinook spawning habitat, exists in the upper basin (upstream of river mile 44).
 - 3) Surveys performed cooperatively with WDFW in 2000 and 2001 documented bull trout (*Salvelinus confluentus*) in three upper basin tributaries. Previous surveys have documented both steelhead (ESA-Threatened) and spring Chinook (WDFW Depressed) in portions of the upper basin. Westslope



cutthroat trout (*Oncorhynchus clarki lewisii*) are also known to have occurred historically in the upper basin. In addition to site-specific habitat benefits, work in the upper basin will have positive downstream effects by improving water quality for other migratory stocks that use the mainstem Klickitat including: coho salmon (*O. kisutch*), fall Chinook (*O. tshawytscha*), adfluvial bull trout (*S. confluentus*), and coastal cutthroat (*O. clarki clarki*) that occur within the current project scope.

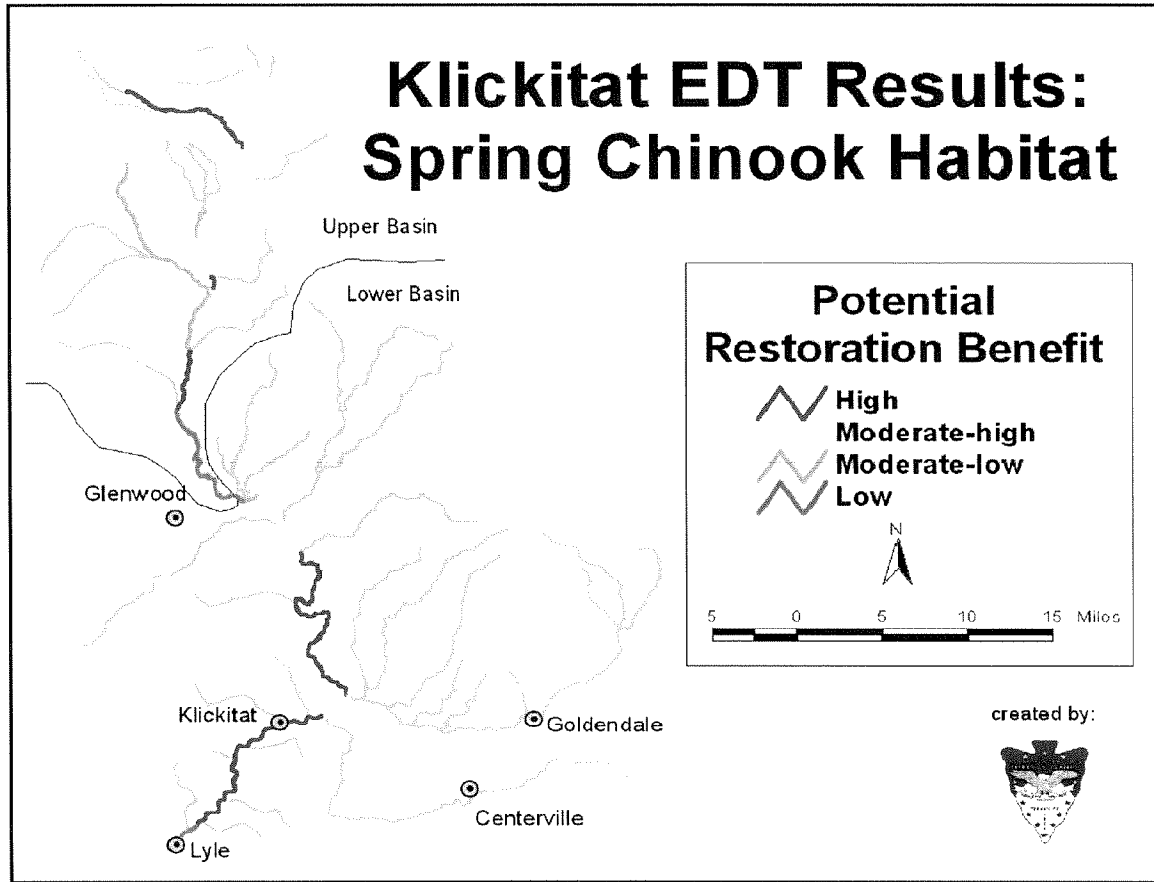


Figure 1. Potential habitat restoration benefits for Klickitat basin spring Chinook according to EDT analysis. The upper/lower basin line delineates the current geographic scope of the Lower Klickitat River Riparian & In-Channel Habitat Enhancement Project.

Table 1. Summary of habitat miles and relative distribution by location within the Klickitat basin for two native anadromous salmonids.

Species	Subbasin	Miles of Habitat	% of total (by species)
Spring Chinook (<i>O. tshawytscha</i>)	Lower	44.1	38
	Upper	72.6	62
Steelhead (<i>O. mykiss</i>)	Lower	134.7	59
	Upper	94.3	41



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- 4) Approval of the FY 2001 budget and work statement took five and one-half months. Because it was not received until mid-August 2001, many 2001 field activities were put on hold. Ground was lost as a consequence. At least one landowner we had enlisted lost interest entirely. Several others are uncertain if they want to participate in the future. While we rebuild trust with landowners in the lower basin, there are projects that could be implemented on-reservation in the upper basin. Producing results throughout the subbasin will improve our ability to enlist private landowners in the lower basin.
 - 5) The other three Yakima-Klickitat Fisheries Project (YKFP) projects (Monitoring and Evaluation - BPA # 199506325, Design and Construction - BPA # 198811525, and Management - BPA # 198812025) provide for identifying, implementing and monitoring production objectives for the entire Klickitat subbasin. The LKRRICHP comprises the habitat enhancement component of YKFP activities in the Klickitat subbasin. With multiple funding mechanisms available to conduct enhancement work, including the Washington State Salmon Recovery Funding Board (SRFB), there are opportunities for supplemental funding. For example, for FY2001 we obtained two grants (one from the SRFB and one from the Mid-Columbia Regional Fisheries Enhancement Group) to cover subcontracting costs on a feasibility assessment (~ \$30,000) with an in-kind match of staff time and materials from the LKRRICHP. The present geographic scope, severely limits our ability to pursue similar funding arrangements that distribute the funding burden across multiple entities to compliment YKFP objectives. By increasing the geographic scope of work, existing resources of the LKRRICHP could be used to leverage and administer outside funding *within funding levels already approved during the Provincial Review*.
- B) ISRP comments from the Provincial Review included 1) completion of an assessment and prescription plan (to provide rationale for identification and prioritization of restoration activities), 2) development of a watershed council, and 3) verification of EDT prior to use for habitat prioritization. Over the past year, YN Fisheries has made efforts to address all three points.
- 1) Considerable time has been dedicated to developing an Access database to organize habitat data, improve data availability, and strengthen analytical capabilities. We have also been gathering and developing GIS themes for attributes throughout the subbasin, including project sites, data collection points, stocking locations, and EDT reaches. Last month we successfully linked our Access database to ArcView (GIS) to provide availability of summary statistics (e.g. mean residual pool depth, LWD frequency, etc.) contained in the database available to a user from within a single application (ArcView). We have continued to identify and review sources of historic information, including technical reports from hydropower surveys in the early 1900s, cadastral survey notes from the 1870s, and photos and information associated with land-use activities (e.g. railroad lines that used to operate in the area). By viewing recent data in light of historic information we develop a more complete vision of historic habitat conditions from which to identify and prioritize the need for restoration and enhancement activities. To date the WRIA 30 Limiting Habitat Factors Analysis has directed our focus on project identification and development. Based on the collective scientific opinion of watershed and fisheries professional in the subbasin, it provides an acceptable starting point. YN Fisheries hired a staff member in November to compile and synthesize existing information into a Watershed Assessment (BPA project #20118 –



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Klickitat River Subbasin Assessment). The assessment will provide the foundation for a plan that identifies information and restoration needs, prioritizes them, and outlines a procedure to fulfill those needs throughout the entire subbasin. Thus, it is appropriate for the LKRRICHP to have the same scope so that a mechanism exists to conduct work identified throughout the assessment area.

- 2) YN Fisheries has been an active participant in the Washington State Salmon Recovery Process (HB 2496) within the Klickitat Lead Entity. Staff regularly participate in Technical Advisory Group (TAG) meetings as well as provide technical support at Citizen's Review Committee (CRC) meetings. We have also provided extensive guidance and technical support to the Lead Entity. We have a good working relationship with the CRC and are currently assisting them develop a Habitat Strategy that we envision will contribute to the Watershed Plan to be developed for the 2003 Provincial Review.
- 3) EDT is one component that we anticipate using to prioritize reaches for enhancement and data collection activities. YKFP staff will be using data and information collected by the LKRRICHP and Monitoring and Evaluation projects to aid verification of EDT results. Other YN Fisheries staff are currently working with the Upper Columbia Fish Recovery Board to design EDT verification procedures and will be enlisted to assist the verification process in the Klickitat subbasin.

C) Objectives and funding approved in our Provincial Review proposal will remain unchanged.

Conclusion

Due to a compressed submission period associated with the Gorge Provincial Review in August 2000, ongoing projects were resubmitted with minimal alterations and without changes in scope. Subsequent insights provided by improved data management, reviews of historic information, and completion of the spring Chinook EDT analysis. The presence of two ESA Threatened species (bull trout and steelhead) in combination with one depressed stock (spring Chinook) in the upper basin supports the need for a single, coordinated habitat enhancement effort for the Klickitat Subbasin. Though frustrating, we have viewed setbacks associated with delayed FY 2001 contract approval as opportunities to address the ISRP's concerns and take a more comprehensive view of habitat needs throughout the subbasin. The absence of a coordinated habitat program throughout the subbasin and the improved ability to leverage outside funding further support increasing the geographic work scope to encompass the entire Klickitat basin.

The information that has come to light since the Gorge Provincial Review (presented above) provides an adaptive management opportunity. The net result will improve effectiveness and efficiency of basinwide habitat enhancement activities providing additional benefits to threatened steelhead and bull trout as well as other depressed salmonid stocks at no additional cost to BPA. Pending approval of this request, the project should be renamed to "Klickitat Watershed Enhancement Project."