



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

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November 6, 2001

Frank L. Cassidy, Chair  
Northwest Power Planning Council  
851 SW 6th Ave., Suite 1100  
Portland, OR 97204-1348

Dear Chairman Cassidy:

The Northwest Power Planning Council (Council) is on the verge of deciding some budget issues that will have very large consequences for satisfying the provisions of both the Endangered Species Act in the Columbia Basin and the Northwest Power Act. The Washington Department of Fish and Wildlife (WDFW) supports moving forward on budget issues, as there are many immediate needs, but is concerned about setting budget caps for outlying years without consideration of the outcome of the planning processes that the Council has initiated. We urge the Council to base their decisions on regional efforts to plan and implement both the newly adopted Fish and Wildlife Program (Program) and of the off-site mitigation portions of the recent Biological Opinion on the operation of the Federal Columbia River Power System (BiOp).

In Washington state, we are focussing on the unique strengths of the regional salmon recovery groups, such as the Lower Columbia Fish Recovery Board and the Upper Columbia Salmon Recovery Board, to provide a central role in implementation of the off-site mitigation portions of the BiOp. Certainly, we continue to rely on the Council for implementation of the Fish and Wildlife Program. State and tribal fish and wildlife managers will play a vital role in both arenas, and will assist the regional recovery groups in matching and building upon other sources of state and local support to build effective local salmon recovery programs. We all recognize that salmon will not recover without successful local salmon recovery groups. And so, the Council's first objective for implementation of the BiOp should be to provide the local groups with the support they need to flourish.

The first pair of challenges that the local groups face is intensive involvement in both sub-basin planning and the first round of project proposals that support BiOp implementation. WDFW is firmly committed to providing the assistance necessary to the local salmon recovery groups for production of sub-basin plans that meet both state and

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federal requirements for salmon recovery and provide a clear road map for local recovery efforts. WDFW is also committed to supporting the local groups as they engage in the project proposal arena, as that is where implementation of the off-site mitigation portions of the BiOp begins in Washington.

At the same time, WDFW believes that sub-basin planning and project proposals to meet Northwest Power Act obligations must also move forward. WDFW strongly supports the structure of the new Fish and Wildlife Program; an ecosystem-based program that relies on planning at the sub-basin level is a very appropriate mechanism for implementing the requirements of the Northwest Power Act. We have consistently argued therefore, that sub-basin planning must be conducted on a reasonable time scale and funded sufficiently to allow full participation by the broad array of management entities, local governments and citizens groups that are vital components of a sub-basin plan. To that end, we have worked hard this past year to encourage broader participation in the Columbia Plateau sub-basin summary process and project proposal process. As a result we saw significant improvement in participation in Plateau summary process and project development by parties other than the fish and wildlife managers.

As they are completed over the next few years, the sub-basin plans will provide the region with a definitive picture of the resources that will be necessary to implement the off-site mitigation portion of the BiOp and the new Fish and Wildlife Program. Bonneville Power Authority (BPA) apparently holds that expectation as well, as they have consistently stated that when presented with a comprehensive regional plan, they would fund that plan. We understand a comprehensive regional plan as meeting the requirements of the Power Act and the salmon recovery needs under the Endangered Species Act (ESA), through reliance on local planning and local projects. In the meantime, we are guided by the sub-basin summary process, which is expected to support development and review of projects while full-scale planning efforts are underway. Using the Columbia Plateau as an example, we produced, and encouraged others to produce, a broad array of project proposals aimed at addressing crucial aspects of both BiOp and Fish and Wildlife Program implementation. It was not surprising that the total three-year cost of all proposals, including ours and those that we encouraged, and after ISRP and CBFWA review, was \$159 million in the Plateau alone. BPA, the Council, the Federal Forum, the Four Governors, all asked the region to roll up its sleeves and begin planning in a more holistic manner, and the resulting project list for the Plateau reflects that, and begins to provide a more realistic picture of the resources that the Region will need to implement both the BiOp and the Program.

WDFW has worked hard through the last year, and encouraged others to work hard as well, to develop projects that address the new Fish and Wildlife Program and address ESA-listed salmon recovery needs. We realize that the Council may fund just a base

budget for this funding cycle that supports little more than on-going work and existing commitments for the Plateau. However, if this is the outcome, the region stands to lose a lot. We will lose a lot of the enthusiasm we have developed amongst our partners and others, we will lose a lot of opportunities to perform critical actions, and we will lose an opportunity to continue the necessary regional dialogue on what constitutes a sufficient salmon recovery effort and Fish and Wildlife Program.

Let me cite some specific examples of projects that are probably imperiled at this juncture. These are just some of the worthy, credible projects that may go unfunded for at least three years, if the short-term base budget becomes the long-term:

**Acquire Rattlesnake Slope Addition (25020)** is an expensive (\$3,542,500) but impressive parcel of high-quality shrub steppe that is connected to both the Hanford N.M. and WDFW wildlife areas. This proposal was developed by the Rocky Mountain Elk Foundation and has very strong local support.

**Passage of fall chinook at LGD during winter (25064)** is a multi-agency research project, with BiOp implications, that examines fall chinook biological adaptations for improved survival in a reservoir environment (\$438,000).

**Pygmy rabbit recovery (25042)** funds (\$461,116) a desperately needed captive breeding program for preservation of this species in Washington.

**Assess bull trout populations in the Yakima watershed (25012)** is a three year (\$558,947) survey effort by WDFW to gain baseline information on a listed species in a critical watershed.

It is becoming clear that a long-term budget level of \$186 million annually, as BPA apparently proposes, represents a choice to fund on-going Fish and Wildlife Program projects and some small amount of new work that would, by necessity, be BiOp implementation projects. There will be many, important fish and wildlife projects left unfunded, and it is unclear whether this level of funding will provide what is needed for BiOp implementation. Capping annual spending at \$186 million for the long-term forestalls regional debate on whether this is the appropriate level of funding before the region has been able to fully describe the needs.

There are alternatives for the long-term. The last of the sub-basin summaries are almost complete and draft work plans for all provinces will be available in another six months. At that point, the funding needs for the first three years of the new Fish and Wildlife Program and the first round of off-site mitigation projects for the FCRPS BiOp will be identified. There is no need for the Council to make three-year funding decisions on a province by province basis prior to identifying the total package. Instead, once the package has been identified, the Council and NMFS should engage BPA in discussions about the appropriate three-year funding level for satisfying the BiOp requirements and

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the Fish and Wildlife Program requirements. Funding decisions beyond three years have to be guided by and be responsive to the results of the sub-basin planning efforts that are just now being initiated. Why implement a planning program of this magnitude if Bonneville is not prepared to fund the identified needs that are their responsibility under the Fish and Wildlife Program or the BiOp?

The decisions that the Council makes on these matters will have a lasting impact on the fish and wildlife resources, both imperiled and healthy, of the Basin. I am ready to provide you whatever assistance I can to make certain that these impacts are positive. And, I offer my thanks for all of your endeavors on behalf of the fish and wildlife of the Columbia Basin.

Sincerely,



Jeff P. Koenings, Ph.D.  
Director

cc: Tom Karier  
Curt Smitch  
Bob Nichols  
Jim Waldo  
Brian Allee, CBFWA  
Upper Columbia Salmon Recovery Board  
Lower Columbia Fish Recovery Board  
John Palensky, NMFS