

Columbia Conservation District

202 South 2nd St. - Dayton, WA 99328-1327 - Phone (509) 382-4773 - FAX (509) 382-4273

May 13, 2004

Judi Danielson, Chair Northwest Power and Conservation Council 851 SW 6th Avenue, Suite 1100 Portland, OR 97204-1348

Subject: Support for and Approval of Tucannon Subbasin Plan

Dear Chair Danielson,

The Columbia Conservation District has been working for over a year with others involved in our subbasin to develop the Tucannon Subbasin Plan. District staff and board members provided significant guidance throughout the process, from policy-level decisions to discussion of specific language. A public review draft of the Tucannon Subbasin Plan was distributed on April 12, 2004, with the public comment period closing on April 23, 2004. Public comments have been addressed in the plan, as appropriate.

During our meeting on May 12, 2004, the Columbia Conservation District approved submittal of the Tucannon Subbasin Plan to the Northwest Power and Conservation Council. This plan represents a joint effort on behalf of local stakeholders to identify priorities for aquatic and terrestrial species habitat restoration and protection. These priorities are scientifically-based, take into account local opportunities, and attempt to balance issues of concern for various stakeholders.

We approved this plan to guide the expenditure of Bonneville Power Administration (BPA) project funding through the Northwest Power and Conservation Council's Fish and Wildlife Program for the next several years. The Columbia Conservation District does not view this plan as the subbasin's Endangered Species Act (ESA) compliance plan for listed species (aquatic or terrestrial), but agrees that it will inform the ESA compliance process that is being conducted through other planning efforts such as the Snake River Salmon Recovery Plan.

This plan is provided with the recognition that additional refinements and scientific understanding is needed. New information and plan implementation over time will likely result in updated priorities and strategies. Further, significant cooperation will be needed by local landowners to implement this plan. The District is providing this plan with the understanding that private landowners will be involved on a voluntary basis.

While the District agrees with the majority of information provided in the plan and its general direction regarding enhancement of aquatic and terrestrial habitats, we would like to highlight the following concerns:

- The District is concerned about the inclusion of numeric fish population goals. While we recognize the reasons why the co-managers suggested numeric fish population goals for inclusion, we believe that this information is not appropriate for a habitat protection and restoration plan.
- The biological objectives presented in the plan may be overly optimistic, given the significant amount of work that has occurred in the past few years in Columbia County.

We anticipate that these concerns will be addressed by ongoing discussions in the appropriate forum. We look forward to the opportunity for further refinement of the Tucannon Subbasin Plan and the benefits that will be achieved through its implementation.

Sincerely,

Columbia Conservation District Board Chairman



Columbia Country Board of Commissioners

341 E. Main Dayton, Washington 99328 (509) 382-4542

May 18, 2004

Judi Danielson, Chair Northwest Power and Conservation Council 851 SW 6th Avenue, Suite 1100 Portland, OR 97204-1348

Subject:

Support for and Approval of Tucannon Subbasin Plan

Dear Chair Danielson:

The Columbia Conservation District has been working for over a year with others involved in our subbasin to develop the Tucannon Subbasin Plan. District staff and board members provided significant guidance throughout the process, from policy-level decisions to discussion of specific language. A public review draft of the Tucannon Subbasin Plan was distributed on April 12, 2004, with the public comment period closing on April 23, 2004. Public comments have been addressed in the plan, as appropriate.

During the Columbia County Commissioner meeting on May 17, 2004, we endorsed and supported the Columbia Conservation District approved submittal of the Tucannon Subbasin Plan to the Northwest Power and Conservation Council. This plan represents a joint effort on behalf of local stakeholders to identify priorities for aquatic and terrestrial species habitat restoration and protection. These priorities are scientifically-based, take into account local opportunities, and attempt to balance issues of concern for various stakeholders.

We also approve this plan to guide the expenditure of Bonneville Power Administration (BPA) project funding through the Northwest Power and Conservation Judi Danielson, Chair May 18, 2004 Page 2

Council's Fish and Wildlife Program for the next several years. The Columbia County Commissioners and Columbia Conservation District do not view this plan as the subbasin's Endangered Species Act (ESA) compliance plan for listed species (aquatic or terrestrial), but agrees that it will inform the ESA compliance process that is being conducted through other planning efforts such as the Snake River Salmon Recovery Plan.

This plan is provided with the recognition that additional refinements and scientific understanding is needed. New information and plan implementation over time will likely result in updated priorities and strategies. Further, significant cooperation will be needed by local landowners to implement this plan. The Columbia County Commissioners support the District in providing this plan with the understanding that private landowners will be involved on a voluntary basis.

While the District agrees with the majority of information provided in the plan and its general direction regarding enhancement of aquatic and terrestrial habitats, they would like to highlight the following concerns and we support their position on these issues:

- The District is concerned about the inclusion of numeric fish population goals. While we recognize the reasons why the co-managers suggested numeric fish population goals for inclusion, we believe that this information is not appropriate for a habitat protection and restoration plan.
- The biological objectives presented in the plan may be overly optimistic, given the significant amount of work that has occurred in the past few years in the Tucannon Subbasin.

We anticipate that these concerns will be addressed by ongoing discussions in the appropriate forum. We look forward to the opportunity for further refinement of the Tucannon Subbasin Plan and the benefits that will be achieved through its implementation.

Sincerely,

Charles G. Reeves, Chariman

Richard W. Jones, Commissioner

Dwight Robanske, Commissioner



8702 North Division, Spokane, WA 99218 - 509-456-2088 - Fax 509-456-4071

May 26, 2004

Judi Danielson, Chair Northwest Power and Conservation Council 851 SW 6th Avenue, Suite 1100 Portland, OR 97204-1348

Dear Chair Danielson:

The Washington Department of Fish and Wildlife has been working for over a year with others involved in this subbasin to develop the Tucannon Subbasin Plan. The Department has contributed to the process by providing technical guidance and products, as well as, participating in strategy and management plan development together with stakeholders in the region.

The Department would like to express our support for the process that developed *The Tucannon Subbasin Plan, May 2004 Version*. This plan represents a joint effort on behalf of local stakeholders and co-managers to use the best available science in combination with local interests and knowledge to set priorities and develop strategies and the final management plan. In particular, we applaud the efforts on the part of the subbasin planners to have an open and inclusive process that provided opportunities for participation by a wide range of state, federal, tribal and local managers, natural resource experts, landowners, local governments, and citizens.

Development of *The Tucannon Subbasin Plan, May 2004 Version* followed the recommended guidelines in the Council's, *Technical Guide for Subbasin Planners* (NPCC 2001) to the extent appropriate to the ecological, cultural, social and economic realities of the subbasin – and consistent with the limitations of the available assessment tools, timeframe and budget.

The Department will participate in the open review process that runs through August 12th. During this time period we will conduct a thorough review of the plan and provide comments to NPCC staff for inclusion in the re-write period to follow. The Council and subbasin planners have our continued support in this process and we look forward to a successful conclusion.

Sincerely,

John Andrews Region 1 Director

cc: John Marsh Terry Bruegman



CONFEDERATED TRIBES of the

Umatilla Indian Reservation

P.O. Box 638
Pendleton, Oregon 97801
Fisheries (541) 276-4109 - Fax 276-4348
Wildlife (541) 278-5298 - Fax 966-2397

May 27, 2004

Judi Danielson, Chair Northwest Planning and Conservation Council 851 S. W. Sixth Ave., Suite 1100 Portland, OR 97204-1348

Dear Mrs. Danielson:

The Confederated Tribes of the Umatilla Indian Reservation support the submittal of the subbasin plans for the Umatilla, Walla Walla, Tucannon, Grande Ronde and John Day River Basins because they represent a considerable advancement of integrated fish and wildlife planning. However, given the funding levels and time constraints, the wide scope and the concurrent nature of the planning effort within these and other subbasins in the CTUIR territory, we have been unable to participate at the level we would have liked. Assessment, planning and public review processes have lagged behind schedule throughout the Columbia Basin, providing inadequate time for a thorough technical and policy review of the plans. Therefore, as comanagers, we cannot responsibly provide our final approval at this time.

We will use the next several months, while the plans move through the Council's public and independent science review process, to more completely consider the work done to date and the implications to our treaty reserved resources. Our written comments along with recommended revisions will be submitted for Council consideration during this period. At the same time, we expect the Council will articulate how they intend to assure a clear link between all the subbasin plans and other obligations in the Pacific Northwest such as the Pacific Salmon Treaty between the US and Canada, the fish production and rebuilding obligations defined in the US vs Oregon Columbia River Fish Management Plan and Pacific Northwest Salmon Recovery Planning under the Endangered Species Act.

We support subbasin planning under the Council's Fish and Wildlife Program and are committed to working with you and your staff to make the necessary revisions in preparation for amendment of these documents as envisioned by the Council. Given the magnitude of the task at hand, we ask that you consider the significant challenges being placed on the policy and staff capacities of the co-managers and request that you provide the greatest possible flexibility in the review process and schedule. We share the Council's high expectations for these plans and want to assure that we take the time to make them the best products possible for the rate payer's investment. Likewise, we want to see the products of this investment, including the planning teams and the valuable relationships they have forged, protected and advanced as we work to

integrate and implement these subbasin plans into a regional Basin Wide management, implementation and planning tool.

Please feel free to contact Fish and Wildlife Programs management staff, Gary James or Carl Scheeler for any questions or comments you may have.

Sincerely,

Jay Minthorn

Chair, Fish and Wildlife Commission

Jon Menther

pc: Subbasin Planners

CTUIR Board of Trustees

CBFWA Members
J. P. Patt, CRITFC

www.snakeriverboard.org

May 28, 2004

Snake River

Salmon Recovery

Judi Danielson, Chair Northwest Power and Conservation Council 851 SW 6th Avenue, Suite 1100 Portland, OR 97204-1348

Subject: Support for Submission of May 2004 Version of the Asotin, Lower Snake, Tucannon and Walla Walla subbasin plans

Dear Chair Danielson,

Through this correspondence, the Snake River Salmon Recovery Board (the Board) provides general support for submission of the May 2004 Version of the Asotin, Lower Snake, Tucannon and Walla Walla subbasin plans to the Northwest Power and Conservation Council (the Council). The Board self-initiated in 2002 to oversee development of the Snake River regional salmon recovery plan with the State of Washington's guidance and support. The Board is comprised of 21 voting members from the five counties in the recovery region and includes representatives from the Confederated Tribes of the Umatilla Indian Reservation and the Nez Perce Tribe. The Board believes that participation of all communities and stakeholders in the recovery planning process is essential.

Although the Board is providing general support for submission of the May 2004 Version of the subbasin plans, governmental entities and stakeholders that comprise this Board may likely submit formal comments to the Council during the public comment period ending August 12, 2004. For example, the Nez Perce Tribe and Confederated Tribes of the Umatilla Indian Reservation will continue to review the May 2004 Version of the subbasin plans to determine if they are consistent with tribal management actions and treaty rights, as required by section 4 of the Northwest Power Act.

Development of the subbasin plans was a collaborative effort led by the Asotin County Conservation District (Asotin Subbasin), Columbia Conservation District (Tucannon Subbasin), Pomeroy Conservation District (Lower Snake Mainstem Subbasin), and Walla Walla County/Walla Walla Basin Watershed Council (Walla Walla Subbasin). The plans integrate the perspectives of fish and wildlife managers, land managers, local governments, biologists and other scientists, landowners, interest groups, and the general public. The plans represent a step forward in collecting, synthesizing, and interpreting data, as well as in prioritizing restoration and protection activities for aquatic and terrestrial species and

habitats. The Board acknowledges that this collaborative process incorporated the best available science, given the limiting constraints of time and funding.

In addition, the Board recognizes that these versions of the subbasin plans are a snapshot in time. They will be revised and evolve over time. Regardless, they should be used to guide ongoing and potential fish and wildlife restoration and protection activities. The Board believes that coordination and communication of implementation is critical and that implementation needs to be focused towards on-the-ground actions.

As you know, the Board is currently in the process of developing a recovery plan for salmonids listed under the Endangered Species Act in the applicable portions of the Snake and Mid-Columbia Evolutionary significant units. This includes areas in the Asotin, Lower Snake, Tucannon and Walla Walla subbasins located in the State of Washington. Species addressed will include sockeye, spring/summer chinook, fall chinook, steelhead and bull trout. Much work yet remains on synthesizing information across these subbasins to develop relationships and strategies between the four risk factors (hydropower, hatcheries, harvest and habitat) and the actions necessary to achieve delisting, and more importantly, healthy, harvestable populations. Therefore, it is the Board's intent to rely heavily on the assessments, biological objectives, and strategies developed in the May 2004 Version of these subbasin plans for the habitat component of the recovery plans.

The Board believes that building the recovery plans from community and agency supported products like subbasin plans will prove to be an efficient and effective strategy. Delisting threatened and endangered fish, and establishing healthy, harvestable populations will require unprecedented commitments from the funding and regulatory agencies, as well as from affected stakeholders and the general public. Implementation will occur over many years; therefore, maintaining continuity, consistency and oversight at the regional level throughout the recovery planning horizon is essential.

If you have questions or comments regarding this correspondence, please contact the Board's Director, Steve Martin, at 509-382-4115.

Sincerely,

Jay Moizmiller

Eric Myers