

# memorandum

DATE: August 1, 2007

REPLY TO  
ATTN OF: KEC-4

SUBJECT: Supplement Analysis for Yakima/Klickitat Fisheries Project, Coho Reintroduction Feasibility Study Phase II (DOE/EIS-0169-SA-13)

TO: Patricia Smith  
Project Manager - KEWL-4

**Proposed Action:** Implement Phase II of the Yakima Coho Reintroduction Feasibility Study

**Project No.:** 1995-063-25 and 1997-013-25

**Location:** Various locations throughout the Yakima River Basin; Benton, Yakima, and Kittitas counties, Washington

**Proposed by:** Bonneville Power Administration (BPA) and co-managed by the Yakama Nation and the Washington Department of Fish and Wildlife (WDFW)

**Introduction:** The Yakima Fisheries Project Final Environmental Impact Statement (YFP EIS) (DOE/EIS-0169, January 1996) analyzed impacts of undertaking fishery research and mitigation activities in the Yakima River Basin. The EIS focused on the impacts of construction and operation and maintenance of anadromous fish production facilities established to conduct supplementation research for spring Chinook, and initial coho reintroduction feasibility studies. The purpose of this supplement analysis is to determine if a supplemental EIS is needed to implement Phase II of the coho reintroduction feasibility studies.

**Description of the Proposed Action:** The proposed action to be analyzed under this supplement analysis is described and analyzed in detail in the attached white paper. The new activities proposed under the Phase II studies are:

- Addition of two new smolt acclimation ponds in the upper Yakima: Brunson and Hundley;
- Use of a mobile acclimation unit to acclimate and release smolts in Toppenish, Cowiche, and Ahtanum creeks;
- Releases of parr in up to 15 tributaries;
- Releases of adults in up to nine tributaries;
- Capping of coho redds in the above tributaries;
- Additional spawning surveys in the above tributaries;
- Additional snorkeling surveys in the above tributaries; and
- Additional juvenile backpack electrofishing surveys in the above tributaries.

The total number of juvenile coho released in the Yakima Basin would not increase over the current numbers; however the release locations would be increased to include experimental releases in tributaries.

The environmental effects of releases of parr, smolt, and adult coho above the Cle Elum and Bumping Lake dams were analyzed in the white paper, but decisions on these releases are the subject of ongoing discussions regarding in lieu issues. These releases are not authorized under BPA funding until these issues are resolved.

**Conclusions of Analysis:** The analysis of potential impacts in the Coho Reintroduction Feasibility Study Phase II white paper concluded that there will be minor, temporary, or no impacts to air quality, terrestrial habitat, land use, aquatic habitat, wildlife, tribal interests, cultural and historic resources, and aesthetics from the implementation of the project. Issues regarding the economic impacts of Roza Dam operations are being addressed in other forums, and it is unlikely that the coho study will exacerbate these issues. Potential impacts to other fish, including bull trout and steelhead which are listed as threatened under the Endangered Species Act, were addressed in the Yakima Fisheries Project EIS, subsequent Supplement Analyses, and consultations under the Endangered Species Act. These documents concluded that the coho studies may have some impacts to other fish species, but that they would be minor and would not jeopardize listed species. In addition, the ongoing monitoring and evaluation program for the Yakima Fisheries Project is designed to identify and correct unacceptable levels of impacts to the non-target aquatic species in the basin. Using the information from over ten years of these studies, the project biologists have selected the tributaries for the Phase II studies to minimize potential impacts to aquatic species.

BPA has been in ongoing consultation under Section 7 of the Endangered Species Act with National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries) on the overall Yakima Fisheries Project activities since 1999. In addition, the Yakama Nation has submitted Hatchery and Genetic Management Plans to NOAA Fisheries for the spring and fall Chinook and coho artificial production programs in the Yakima basin. The Yakima Coho Hatchery and Genetic Management Plan (HGMP) was recently updated and resubmitted to NOAA Fisheries. NOAA Fisheries staff has reviewed the HGMP and approved the release of coho parr; a final HGMP will be prepared and submitted prior to any other of the other new activities being initiated.

A new Biological Assessment was prepared and submitted to the U.S. Fish and Wildlife Service (USFWS) to reinitiate and update ESA Section 7 consultation for the entire Yakima Fisheries Project in May, 2007. The USFWS has not yet issued a Biological Opinion, but plans to do so by September. The only new (not previously consulted upon) activity that would occur in the interim is the outplanting of coho parr in Toppenish Creek, Big Creek, Wilson Creek, Reecer Creek, North Fork Little Naches River, Cowiche Creek, Nile Creek, Blow Out Creek, and Swauk Creek, which was determined to have no effect to listed species or critical habitat. No other new activities will be initiated until after the Biological Opinion is finalized by USFWS.

No additional effects beyond those discussed in the EIS, subsequent supplement analyses, or ESA consultations are expected from the implementation of the proposed action. There would be no land disturbance activities that would affect historical or cultural resources.

The attached white paper was distributed to a mailing list of approximately 200 interested parties, including those who responded to the scoping for this project last fall. Two comment forms were received from members of the public expressing general concerns about:

- The impacts of predators (pikeminnow, pelicans, and seals) on the program,
- The size/complexity of the project,
- Dead fish being left in nets by fishermen,
- Water availability in the lower Yakima River; potential need to transport migrating fish, and
- The cost of the project to taxpayers.

These comments are addressed as follows:

- Predation studies are ongoing as part of the overall Yakima Fisheries Project. The studies have shown that in the Yakima basin, pelicans are not significant predators on smolts. Pikeminnows do prey on smolts, but habitat and flow conditions are more direct concerns for anadromous smolts than predation. Seal and sea lion predation in the lower Columbia is being addressed in other forums. Implementing Phase II of the coho study would not

increase predator numbers or exacerbate predation on other species, as the total number of smolts migrating to the ocean would not change.

- We believe the size and complexity of the coho study is appropriate; the outplantings in the tributaries are proposed to be small and experimental and the overall number of coho released will not increase from the present numbers.
- Regarding the issue of dead fish being left in nets, the Yakama Nation states that it is illegal for tribal members to knowingly waste fish. If fish are found dead in nets this should be reported to the Intertribal Enforcement Office in Hood River at 541-386-6363.
- The lack of water availability in the Yakima River below Prosser Dam to transport migrating salmonids has been mitigated to some degree by an agreement to meet a 1000 cfs minimum flow in the river.
- The cost of the feasibility study is a small portion of the overall Yakima Fisheries Project. No new construction or facilities are required.

The Bureau of Reclamation submitted two specific comments. The first comment was about potential conflicts between coho broodstock collection and maintenance schedules at Roza; the second about funding and operation of the spillway flume at Lake Cle Elum after 2009. The coho broodstock collection and releases into Lake Cle Elum will be coordinated with and subject to these constraints.

**Findings:** As documented in this Supplement Analysis, the potential impacts from the implementation of the Phase II coho reintroduction studies have been examined, reviewed and consulted upon and are not substantially different from those discussed in the Yakima Fisheries Project EIS (DOE/EIS-0169), Record of Decision, Supplement Analyses (SA-01 through SA-12), and related biological assessments and biological opinions. No additional impacts would occur in connection with these activities. There are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, a supplement to the Yakima Fisheries Project EIS is not needed.

/s/ Nancy H. Weintraub

Nancy H. Weintraub

Environmental Protection Specialist – KEC-4

CONCUR:

/s/ Katherine S. Pierce

Katherine S. Pierce

NEPA Compliance Officer – KEC-4

DATE: August 1, 2007

Attachment: Coho Reintroduction Feasibility Study Phase II White Paper

cc:

Dr. David Fast, Yakama Nation

Mr. Mel Sampson, Yakama Nation

Mr. Todd Newsome, Yakama Nation

Mr. Pat Spurgin, Yakama Nation

Mr. Bill Fiander, Yakama Nation

Mr. John Easterbrooks, Washington Department of Fish and Wildlife

Dr. Todd Pearsons, Washington Department of Fish and Wildlife