DATE: December 12, 2008

REPLY TO ATTN OF: KEC-4

SUBJECT: Supplement Analysis for Yakima/Klickitat Fisheries Project, Coho Reintroduction Feasibility Study Phase II – Release of Juveniles above the Lake Cle Elum and Bumping Lake Dams (DOE/EIS-0169-SA-16)

TO: Patricia Smith
Project Manager - KEWL-4

**Proposed Action:** Implement Phase II of the Yakima Coho Reintroduction Feasibility Study - Release of Juvenile Coho above the Lake Cle Elum and Bumping Lake Dams


**Location:** Lake Cle Elum, Kittitas County, WA and Bumping Lake, Yakima County, WA

**Proposed by:** Bonneville Power Administration (BPA) and co-managed by the Yakama Nation (YN) 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 fish 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 the initial coho reintroduction feasibility studies. The purpose of this Supplement Analysis (SA) is to determine if a supplemental EIS is needed for release of juvenile coho above the Lake Cle Elum and Bumping Lake dams.

**Description of the Proposed Action:** The Yakima Fisheries Project is co-managed by the YN and the WDFW. The project consists of the collection of salmonid broodstock, incubation of eggs and rearing of fry in hatcheries, the acclimation and release of smolts, and related ecological analyses in the study of natural production. The proposed action analyzed under this SA is described and analyzed in detail in the attached Coho Reintroduction Feasibility Study Phase II white paper. The new activities analyzed in this SA include:

- Release of 3,000 parr above Lake Cle Elum Dam annually in July
- Release of 3,000 parr above Bumping Lake Dam annually in July
- Release of 10-12,000 smolts from net pens to study downstream passage at the Cle Elum Dam

**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 these actions. The majority of actions in the Coho Reintroduction Feasibility Study Phase II were evaluated in SA 13. 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 adversely affect 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.

Subsequent to the YFP EIS, BPA completed a Fish and Wildlife Implementation Plan EIS (FWIP EIS, DOE/EIS-0312, April 2003) and Record of Decision (ROD). The goal of the FWIP EIS was to develop a comprehensive and consistent policy to guide the implementation and funding of BPA’s fish and wildlife obligations under existing statutes and policies. In the FWIP ROD, BPA adopted the Proposed Action 2002 alternative that characterized the policy direction BPA would take. This policy direction focuses on enhancing fish and wildlife habitat, modifying hydroelectric power operations and structures, and reforming hatcheries to both increase populations of listed fish stocks and provide long-term harvest opportunities. The proposed changes to the coho program would be consistent with the FWIP EIS and ROD, as the changes would be used to gain knowledge about the possibility of repopulating the lakes, with the eventual goal of increasing harvest. The cumulative effects of artificial production programs in the Columbia River basin, including the Yakima Fisheries Project, are also addressed in the FWIP EIS.

The Yakima Coho Hatchery and Genetic Management Plan (HGMP) was updated and resubmitted to NOAA Fisheries in August, 2007. Rich Turner of NOAA Fisheries has reviewed the HGMP and approved the releases described above. A Biological Opinion was issued by the United States Fish and Wildlife Service on October 31, 2007, for the Yakima Fisheries Project which includes all the activities analyzed in this SA.

No additional effects beyond those discussed in the EIS, subsequent SAs, 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:

- predators (pikeminnow, pelicans, and seals),
- the size/complexity of the project,
- dead fish left in nets by fishermen,
- water availability in the lower Yakima River; potential need to transport migrating fish, and
- 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. 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.
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 a report should be made to the Intertribal Enforcement Office in Hood River at 541-386-6363.

Concerns about there being enough water available in the Yakima River below Prosser Dam for adequate fish passage has been mitigated to some degree by an agreement to meet a 1000 cfs minimum flow in the river. The 1000 cfs will be maintained in the lower river to provide adequate fish passage for migrating salmonids.

The cost of the feasibility study is a very 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 SA, the potential impacts from the implementation of releasing coho parr and smolts above the Lake Cle Elum Dam 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-15), 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/ Rachel Rounds  
Rachel A. Rounds  
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CONCUR:

/s/ Katherine S. Pierce  
Katherine S. Pierce  
NEPA Compliance Officer – KEC-4  

Date: December 16, 2008

cc:
Dr. David Fast, Yakama Nation  
Mr. Mel Sampson, Yakama Nation  
Mr. Todd Newsome, Yakama Nation  
Mr. Pat Spurgin, Yakama Nation  
Mr. John Easterbrooks, Washington Department of Fish and Wildlife