



Confederated Tribes and Bands  
of the Yakama Nation

Established by the  
Treaty of June 9, 1855

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May 1, 2013

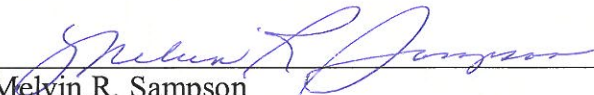
Mark Fritch  
Project, Implementation Manager  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, Oregon 97204


Mr. Fritch,

Attached please find the Yakama Nation–YKFP’s second round response to the Independent Scientific Review Panel comment (ISRP 2012-12) to the *Step II Klickitat River Anadromous Fisheries Master Plan* (July 2012). This response addresses the remaining “Response Requested” question regarding the current segregated steelhead harvest program.

To coordinate further Step review requirements and presentations to Northwest Power & Conversation Council please contact Bill Sharp of my staff at 509.945.3167. Thank you.

Sincerely,

  
Melvin R. Sampson  
YKFP Policy Analyst/Coordinator

  
Date

Yakama Nation Response  
to the  
Independent Scientific Review Panel's  
Step Two Response Review of the Yakama Nation's  
Klickitat River Anadromous Fisheries Master Plan (ISRP 2013-1)

May 1, 2013

At the Northwest Power and Conservation Council's January 7, 2013 request, the ISRP conducted a review of the Yakama Nation's response to the ISRP's Step 2 review of the Klickitat River Anadromous Fisheries Master Plan (project 1988-115-35).

The ISRP organized its review and recommendations around three components of the Master Plan.

1. Segregated Steelhead Harvest: Response Requested

The ISRP requests a response from the sponsors that addresses the questions raised in the attached report concerning the segregated steelhead harvest program. The Master Plan has two goals for steelhead: to provide harvest opportunities to tribal and non-tribal members through a segregated hatchery program and to enhance or restore natural populations in the future through habitat restoration and supplementation. More information is needed on how a balance between conservation and harvest objectives will be achieved. There is not enough information to conclude that the proposed segregated steelhead hatchery can be operated in a manner that protects and conserves the ESA-listed natural populations in the Klickitat. Data are presented that suggest the current program, which involves out-planting of out-of-basin Skamania steelhead in the Klickitat, has had a low genetic impact on natural steelhead. What is needed, however, is a description of the yearly research, monitoring, and evaluation efforts that will be employed to ensure this determination remains valid in the future. Along with this description of methods, there should also be an explanation of how data will be used to help determine if the program should be maintained as is, or changed from its current design. It would be very helpful if explanatory text, similar to the spring Chinook appendix, could be produced for the segregated hatchery program. Such a document could be used to address the questions raised in this review.

2. McCreedy Creek Steelhead Supplementation: Meets Scientific Review Criteria (Qualified)

Questions raised in the ISRP's comments can be addressed in the Step Three review.

3. Spring Chinook Integrated Harvest and Colonization: Meets Scientific Review Criteria (Qualified)

The ISRP appreciated the thorough explanation of this project. A few questions about this program, however, still remain. These can be addressed in the Step Three review.

## Response

As noted by the ISRP, comments 2 and 3 will be addressed in the Step Three review. This response addresses ISRP comment 1 requesting additional responses to issues regarding a potential segregated steelhead production facility identified in earlier Yakama Nation responses to ISRP comments on the 2012 Klickitat Anadromous Fish Master Plan (ISRP 2012-12).

As was set out in our January 4, 2013 response to those comments, while the Master Plan and the supporting EIS discuss the development of a segregated program among the array of alternative production facility development scenarios, the Yakama Nation is not presently proposing that the Bonneville Power Administration fund a segregated steelhead production facility in the Klickitat Subbasin. Furthermore, the Yakama Nation does not intend to propose funding for a segregated steelhead artificial production facility unless it is determined that the development of such a facility is determined to be appropriate after following the process set out in the decision tree that was included with our January 4, 2013 response. Artificial production facility capital funding available from BPA under the Columbia Basin Fish Accord is being directed toward the spring Chinook integrated program proposal and toward relocation of existing coho and fall Chinook production to reduce current levels of species interactions in the river reach between the existing Klickitat Fish Hatchery and Wahkiacus.

We note that the NPCC step review process pertains to development of recommendations on projects proposed for BPA funding. The existing Skamania steelhead production program that is the source of smolts that are currently being released into the Klickitat River is operated by WDFW. Unlike the YKFP capital developments proposed and described in the Master Plan, the Skamania program is exclusively funded from Mitchell Act appropriations administered by NOAA Fisheries. Current Skamania operations, as they pertain to ESA requirements, are addressed in an existing [Hatchery and Genetic Management Plan prepared by WDFW](#).

While the recognition and description of the Skamania direct release program in the Step 2 review may be appropriate for providing context for review of the actions proposed for BPA funding, the Skamania program is not funded by the Bonneville Power Administration, nor is it proposed to be funded by BPA. To summarize our earlier responses (as set forth in our January 4, 2013 document at R1.3 and following), and as the decision tree indicates, we intend to use available RM&E funding to monitor Klickitat steelhead smolts for indications of increasing introgression exceeding the 5% action thresholds. Current RM&E funding commitments and spending are described in BPA project [1995-063-35](#). More intensive RM&E activities will require more funding than is currently available. Furthermore, a segregated hatchery program is only one of the potential responses that may be considered by the regional fisheries managers. It is our intent that any future decision by the YKFP to pursue step review of a modified steelhead program in the Klickitat will depend on the results of review by the regional fish managers of the RM&E products and response alternatives. The issues raised in Recommendation 1, ISRP 2013-01, can be addressed as part of the process, should it occur.