

Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

June 12, 2007

Ms. Mickey Carter, Environmental Protection Specialist
Bonneville Power Administration
P. O. Box 3621, KEC-4
Portland, OR 97208-3621

Dear Ms. Carter:

The Yakama Nation would like to take this opportunity to comment on the draft EIS for the proposed Chief Joseph Hatchery (CJH). Unfortunately, we were unable to attend any of the scoping meetings for this project. Though we support projects like the CJH that are intended to recover salmon and increase harvest opportunity, we have strong concerns that this EIS purposely avoids discussion of potential impacts to other hatchery programs or harvest regimes.

Section 1.6, **Issues Beyond the Scope of this EIS**, states that "*Issues associated with fish restoration, harvest levels, hatchery programs in general, or the relative importance/priorities of other on-going fish protection programs or projects are more appropriately addressed in other forums.*" The fact is, this project has the potential to significantly affect existing harvest and production plans jointly developed by resource co-managers. We believe that given this potential "*impact*", the draft EIS needs a substantially expanded description of how CJH planning and operations will be coordinated with on-going downriver production and harvest management processes.

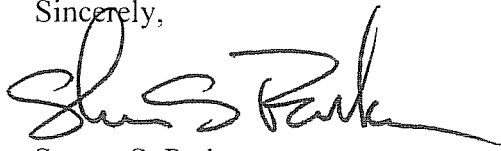
Section 1.7, **Relationship to Fish Management Plans, Programs and Projects in the Vicinity**, describes an apparently exhaustive list of major and more minor planning processes, programs and projects. Conspicuously absent from this section is a description of the *U.S. v. Oregon* planning process, which dictates production and harvest management in the entire Columbia River basin. We are mystified by this omission and consider the draft EIS deficient in its analysis of potential impacts of CJH management to on-going co-management processes. Also missing is a description of potential impacts of CJH operations to existing downriver fishery management regimes. As currently written, the draft EIS does not allow the fishery co-managers to evaluate the potential for disruption of on-going downriver fisheries if CCT seeks modifications of existing management plans to achieve CJH broodstock and associated fishery goals. The draft EIS should disclose the intentions of the project sponsor in this regard and describe a process for engaging the relevant co-managers.

In Section 2.1, **Proposed Project** (under spring Chinook), the draft EIS discusses potential donor stocks that would be used to initiate the program given that this species is extirpated from the Okanogan Basin. It states that adults in other subbasins in excess of "recovery needs" will be used

as broodstock. We think a better description of what “recovery” means in this context is warranted. A better term is “program” rather than “recovery” because each hatchery program has specific production goals which are legally binding under other agreements. This section also states that “*it is possible that Methow composite stock (currently ESA-listed as Endangered) may eventually be developed for use in place of the Carson stock. Any such decision would be based on consultation with NOAA-Fisheries.*” The draft EIS should acknowledge that the Yakama Nation and WDFW also have co-manager jurisdiction and responsibility in these decisions.

We appreciate your consideration of these comments on the draft EIS for the proposed Chief Joseph Hatchery. Please contact me at 509/945-0786, or by email at parker@yakama.com, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven S. Parker". The signature is fluid and cursive, with the first name being the most prominent.

Steven S. Parker
Fisheries Resource Management Program
Yakama Nation

Cc: Sam Jim, Sr. – Tribal Council
Philip Rigdon – DNR
Paul Ward – FRMP
Tim Weaver – Counsel
Olney Patt, Jr. - CRITFC