



Deschutes Basin Board of Control

August 30, 2019

Attn: Kate Freund
U.S. Fish & Wildlife Service
Pacific Region
911 NE 11th Ave.
Portland, Oregon 97232

Attn: Scott Carlon
National Marine Fisheries Service
West Coast Region
1201 NE Lloyd Boulevard, Suite 1100
Portland, Oregon 97232

Re: Submittal of Application for Incidental Take Permits, USFWS Form 3-200-56

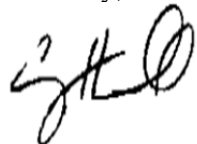
Dear Ms. Freund and Mr. Carlon,

Please find enclosed a signed Federal Fish and Wildlife Permit Application Form 3-200-56, with original signatures by the applicants, which include the eight irrigation districts making up the Deschutes Basin Board of Control and the City of Prineville, Oregon. Because the eight districts are quasi-municipal corporations organized under ORS chapter 545 and the City is a municipality, we believe the applicants are exempt from the U.S. Fish and Wildlife Service application processing fee, per 50 CFR 13.11(d). Nevertheless, we are enclosing a check payable to the U.S. Fish and Wildlife Service in the amount of \$100 in the event it is determined otherwise. We understand there is no corresponding fee required by the National Marine Fisheries Service. Due to its size, the proposed Deschutes Basin Habitat Conservation Plan (DBHCP) that is part of our application is being submitted separately in electronic format.

The applicants would note the recent discussions around certain additional measures that are not currently reflected in the proposed DBHCP, including the concept of a habitat improvement fund for projects in the Upper Deschutes, and the concept of increasing winter flows below Wickiup Dam to 350 cfs by year 15 of the DBHCP. We understand these concepts were analyzed in Alternative 3 of the draft Environmental Impact Statement (DEIS). Further discussions are also needed about the permit structure itself, including what happens if one or more permittees decide to relinquish their permit coverage. While the applicants have not committed to any additional measures or other changes at this time, we acknowledge the Services' desire to see these matters addressed in the final DBHCP and fully anticipate further discussions around these concepts following the receipt of public comments on the current proposed DBHCP and DEIS.

On behalf of the districts and the City, we very much appreciate all the efforts of the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the Confederated Tribes of Warm Springs, Oregon Department of Fish and Wildlife, and all of the other federal, state, and local agencies, nongovernmental entities, and individuals that participated in the process that resulted in the proposed DBHCP. We look forward to the next steps in this process.

Sincerely,



Craig Horrell
DBBC President

PO Box 919 - Madras, OR 97741

DBBC Member Districts

*Arnold Irrigation District • Central Oregon Irrigation District • Lone Pine Irrigation District • North Unit Irrigation District
Ochoco Irrigation District • Swalley Irrigation District • Three Sisters Irrigation District • Tumalo Irrigation District
DBBC President - Craig Horrell, 541-548-6047; chorrell@coid.org*