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August 4, 2003

## **MEMORANDUM**

**TO:** Fish and Wildlife Committee

**FROM:** Mark Fritsch

**SUBJECT:** Step One Review of the "Coeur d' Alene Tribe Trout Production Facility" (Project #1990-044-02)

### **Action**

Council staff will present the Step One (i.e. master plan) Review for Coeur d'Alene Tribe Trout Production Facility, submitted to the Council by the Coeur d'Alene Tribe (CDA) on January 13, 2003. The submittal is intended to provide information for a plan to artificially rear westslope cutthroat trout for release into rivers and streams in the Coeur d'Alene Lake on the Coeur d'Alene Reservation. The Coeur d'Alene Tribe is requesting the project be approved to proceed to step two (i.e. preliminary design and environmental review) of the Three-Step Review Process.

### **Recommendation**

Council staff recommends that the Coeur d' Alene Tribe Trout Production Facility (Project #1990-044-02) no longer be funded and the remaining funds associated with the project be returned to the overall fish and wildlife program budget.

### **Budgetary/Economic Effects**

Planning for this facility has cost \$1,049,000 million dollars, and includes master plan completion and submittal, conceptual engineering designs and cost estimation, staffing to complete necessary work for the submission of the master plan and to provide appropriate training for future hatchery personnel, and genetic analysis<sup>1</sup>. Additional planning expenses that can be anticipated if Council approval is granted include costs for compliance with National

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<sup>1</sup> Includes the cost associated with the current and the previous master plan submittals, but not early baseline surveys associated with Project 1990-044-00.

Environmental Policy Act, staffing costs, planning costs associated with step 2 and 3 for preliminary and final designs, and construction management is estimated at \$114,000 in Fiscal year 2004. Cost of preliminary and final designs are estimated to be about \$270,000. Construction of the Coeur d' Alene Tribe Trout Production Facility is estimated to cost \$2,902,585 and is targeted for construction in Fiscal Year 2005. Annual operation and maintenance costs after all facilities are fully developed would cost about \$350,000. Monitoring and evaluation is estimated to cost about \$300,000 annually. Land purchase associated with the facility is estimated to cost \$1 million<sup>2</sup>. These cost figures are based on estimates from engineers' opinion of probable construction costs and the Master plan for the project.

## **Background**

### **1. History of the development of the Coeur d'Alene Tribe Trout Production Facility**

The initial measures for establishing a Coeur d'Alene fish production facility for native trout were amended into the Council Program in 1987. First steps in this process included a baseline stream survey of tributaries located on the Coeur d'Alene Reservation (see 1987 Program Section 903 (g)(1)(B)).

In 1995, the Council adopted the recommendations of the Coeur d'Alene Tribe to improve the reservation fishery that were based on the baseline stream surveys. These recommendations included: 1) Implement habitat restoration and enhancement measures in Lake, Benewah, Evans, and Alder creeks; 2) Purchase critical watershed areas for protection of fisheries habitat; 3) Conduct an educational/outreach program for the general public within the Coeur d'Alene Reservation to facilitate a "holistic" watershed protection process; 4) Develop an interim fishery for tribal and non-tribal members of the reservation through construction, operation and maintenance of five trout ponds<sup>3</sup>; 5) Design, construct, operate and maintain a trout production facility<sup>4</sup>, and 6) Implement a five-year monitoring program to evaluate the effectiveness of the hatchery and habitat improvement projects (see 1995 Program Sections: 10.8B; 10.8B.1; and 10.8B.20).

Starting in Fiscal Year 1998, the annual prioritization process for projects funded under the fish and wildlife program included a review by the Independent Scientific Review Panel (ISRP), which the Council created in response to a 1996 amendment to the Northwest Power Act. During this initial review, the ISRP recommended a comprehensive basinwide review of artificial production. The ISRP recommended that until completion of that review, the Council "not approve funding for the construction and operation of new artificial propagation programs,"

In July 1997, coincidental to the similar recommendation of the ISRP noted above, Congress directed the Council, with the assistance of the Independent Scientific Advisory Board (this is a panel of 11 scientists who advise both the Council and the National Marine Fisheries Service), to conduct a thorough basinwide review of all federally funded artificial production programs and to recommend as part of this review 1) a coordinated policy for future operation of artificial production programs and 2) means of obtaining such a policy.

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<sup>2</sup> Estimated cost associated with a 20 acres tract of the 103-acre parcel (assumes total cost of \$5million).

<sup>3</sup> Phase 1, as describe in the master plan.

<sup>4</sup> The focus of the master plan (Phase 2, 3 and 4).

Two months later, in September 1997, the Council adopted a policy that built upon the master plan element of its program to ensure that 1) new artificial production projects would be considered by the Council while the Artificial Production Review<sup>5</sup> was under way, 2) ensure these projects would be considered in the context of their roles and potential impacts within specific subbasins and 3) receive the detailed scrutiny recommended by the ISRP prior to approval. This policy is known as the “three-step review.” It calls for “new production initiatives” to follow a basic development process that has three main steps or phases: (Step 1) conceptual planning, represented under the 1995 Program primarily by master plan development and approval; (Step 2) preliminary design and cost estimation, and environmental (i.e. National Environmental Policy Act and Endangered Species Act) review; and (Step 3) final design review prior to construction. In adopting the Three-Step Review Process, the Council agreed with the ISRP’s recommendation to make use of independent peer review for projects as they move through each stage of the process.

Linking environmental review and funding commitments to specific phases allowed the project sponsor and the Council to move from the conceptual to final design in steps, avoiding over commitment of resources at the early stages. The Council found that this step review process provided an orderly way to develop complex and large projects and has adopted it as a tool in making decisions<sup>6</sup>.

On November 15, 1999 the Coeur d’Alene Tribe submitted to Council a master plan, as the first step in the three-step review process. The proposed artificial production program was designed to produce 10,000 catchable sized rainbow trout for the five catch out ponds and up to 100,000 fingerling cutthroat trout for restoration efforts in the target tributaries (i.e. Alder, Benewah, Evans and Lake creeks). Broodstock would be collected from each of the four target tributaries. These fish will be collected as migrating juveniles and held until adults in order to minimize affects on the natural populations. Each year, initially, 100-200 juveniles will be collected from the same sites in the target watersheds. These fish will be individually marked and placed into separate raceways. As these fish mature they will be used as broodstock. Westslope cutthroat trout will be initially stocked as juveniles. It was also proposed that eyed rainbow trout eggs be purchased and raised in the hatchery. When ready the rainbow trout would be outplanted into the five catch out ponds. As fish are removed from the pond, more will be added with a maximum of up to 2,000 per pond annually.

Council staff prepared an issue paper (Council document 99-17) on the above master plan and released it on December 7, 1999. The Council invited comment on the issue paper at the January 12 and February 1, 2000 meetings and accepted written comments through February 4, 2000. The key issues focused on genetic and ecological risk, habitat, basin planning, catch-out ponds, ESA listing and harvest management. No oral comments were made regarding this project at the two meetings where a request was made. The only comment received occurred on February 4, 2000 in written form from Idaho Fish and Game (IDFG). Many of issues inherent in

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<sup>5</sup> The Council adopted the Artificial Production Review report (Council document 99-15) at its October 13, 1999 meeting. This report contains a set of policies intended to guide the use of artificial production in the Columbia Basin.

<sup>6</sup> On October 18, 2001 the Council adopted an updated review process called the Major Project Review process that incorporating the three-step review process (Council document 2001-29).

IDFG comments were addressed in the Independent Scientific Review Panel (ISRP) review associated with their review of the submitted master plan (ISRP document 2000-1).

At the April 5, 2000 meeting in Boise, the Council approved the master plan for the Coeur d'Alene Tribe Trout Production Facility. While it approved the master plan, the Council requested a report, prior to any other activity associated with the development of preliminary designs, that provided a detailed analysis of the yields from the test wells and an analysis on the most cost effective and efficient means to provide trout for the catch out ponds. In addition, the Council requested that the report clearly address the issues raised in the issue paper (Council document 99-17) and ISRP review (ISRP document 2000-1), especially as it relates to the limiting water.

On February 5, 2001 Council received from J-U-B Engineers, Inc a report entitled *Analysis Of Well Yield Potential For A Portion of the Coeur D'Alene Reservation Near Worley, Idaho*. This report was followed by an additional report, from the Coeur d'Alene Tribe on March 28, 2001, that include a memo addressing the well analysis report (with additional attachments) and cost effectiveness regarding trout for the catch-out ponds. The report and additional document were intended to address the conditions placed on the project as part of the step approval by Council on April 5, 2000. The water report confirmed the complex nature of the dynamics of the hydrogeologic setting of the well network in the vicinity of the proposed facility. The report concluded that additional evaluations were needed to understand the nature of the proposed ground water system.

Due to the timing of the water evaluation report submittal and the other elements of the pre-step 2 submittal (i.e. including the Council's request regarding the water analysis and rainbow cost effectiveness documents prior to any activities associated step 2) the Council recommended that direction to proceed to preliminary design (i.e. step 2) be addressed as part of the upcoming provincial review.

On June 27, 2001 Council approved funding recommendations for the Mountain Columbia provincial review<sup>7</sup>. The Council concluded that the ISRP's criticisms, as part of their review of project proposals for the Intermountain Province, were so severe that further consideration of the existing artificial production proposal would be unsuccessful if returned to the ISRP for review<sup>8</sup>. The Council decision recommended that the Coeur d'Alene Tribe be provided an opportunity to revise the project concept. That would be an opportunity to consider the challenges observed for an artificial production approach and develop a new conceptual design. This would be a "step one" review (i.e. master plan) in the Council process for artificial production projects<sup>9</sup>.

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<sup>7</sup> Since the time of this decision the activities associated with the Coeur d'Alene subbasin have been realigned to the Intermountain Province.

<sup>8</sup> The ISRP (ISRP document 2001-4) recommended no funding for the Coeur d'Alene Tribe's proposed trout production facility (#1990-044-02). The central criticisms are the basis for artificial production assumptions and predation in Lake Coeur d'Alene. The project sponsors ask that the Council allow the current proposal to continue in "Three-step" review, notwithstanding the ISRP's criticisms

<sup>9</sup> As part of the provincial/step decision the tribe utilized approximately \$132,000 of their remaining Fiscal Year 2001 budget to initiate a study on the food habits of the predatory fishes and alternative site analysis (per ISRP comments). Out years will focus on planning in Fiscal Year 2002 and construction in 2003. Funding in Fiscal year 2001 and 2002 (\$244,616) is conditioned on the implementation of the predation study and alternate site evaluations only, future funding is dependent on a favorable step review.

To accomplish the task of revising the project concept the Coeur d'Alene Tribe formed an Interdisciplinary Team comprised of eleven recognized scientists in the fields of hatchery construction, hatchery life support systems, fish ecology, and fishery management. The Coeur d'Alene Tribe and the team built upon the critical uncertainties raised in the previous master plan review and highlighted the importance of research/monitoring and evaluation strategies in the development of a new master plan. This "new" master plan and supporting documents were submitted to the Council on January 13, 2003.

## 2. Updated Master Plan

The updated master plan and supporting documents provide information for a plan to produce adfluvial westslope cutthroat trout for release into rivers and streams in the Coeur d'Alene Lake basin on the Coeur d'Alene Reservation. This native fish restoration facility is for producing sufficient numbers of locally adapted fish to meet the harvest and research needs identified by the Coeur d'Alene Tribe.

The Coeur d'Alene Tribe is proposing that the Bonneville Power Administration (BPA) implement the proposal in phases to provide interim fishery benefits while the hatchery program is developed and refined based on evaluations of critical uncertainties.

- **Phase 1** allows for immediate harvest opportunities utilizing trout ponds for purchased rainbow trout release<sup>10</sup>,
- **Phase 2** allows for harvest opportunities of released cutthroat trout in reservation streams currently lacking fishable populations,
- **Phase 3** calls for the re-establishment of sustainable native cutthroat trout populations in natal streams, and
- **Phase 4** represents the ultimate goal of providing sustainable harvest opportunities of cutthroat trout on the Coeur d'Alene Reservation.

Based on the production objectives identified by the CDA, the facility will contribute 65,000 fingerlings (1.5 inches), 27,000 juveniles (4.0 inches), and either 20,000 adults (8-10 inches) or 17,000 adults (13 inches) at full capacity. At full production, the Coeur d'Alene trout facility is conservatively designed to hold a maximum of 247,200 cutthroat (23,780 pounds) at various sizes and ages. It is anticipated that 6 to 8 years will be required to fully develop a cutthroat broodstock and achieve full cutthroat trout production. Releases of fish will target specific water bodies for research and harvest. Release numbers are based on interim fishery, research, and evaluation objectives. Future release numbers will be revised based on results of initial investigations.

<i>Number of Fish</i>	<i>Size/Weight</i>	<i>Species/Life Stage</i>	<i>Pounds Produced</i>
1,600	12 inch/0.75 lbs	CTT/Broodstock	1,200
130,000	1.5 inch/1.2 lbs per 1,000	CTT/Fry	156
55,000	4 inch/22.6 per 1,000	CTT/Fingerling	1,243

<sup>10</sup> Phase 1 is addressed under Project 1990-044-00, *Implement Fisheries Enhancement Opportunities on the Coeur d'Alene Reservation* (FY 2001 Project Proposal, Section 5, objective 3).

24,000	7 inch/111 per 1,000	CTT/Adults	2,664
20,000	8-10 inch/272 per 1,000	CTT/Adults	5,440
<u>17,000</u>	13 inch	CTT/adults	<u>13,080<sup>1</sup></u>
<b>247,600</b>			<b>23,780</b>

<sup>1</sup>*Produced using grow-out ponds.*

Sources of hatchery broodstock will be developed consistent with program fishery and conservation goals based on fish availability and a careful benefit risk analysis. Potential alternatives include: 1) natural-origin fish that preserve attributes of the wild populations and minimize risks associated with straying, 2) sterile triploids that pose little risk of introgression, and/or 3) a hatchery stock selected to minimize overlap with natural spawners.

Effective monitoring is critical to a successful program. Effective monitoring determines whether the action completed achieved the objective. The monitoring program as outlined in the master plan will be critical to the effective and efficient adaptive management of this phased natural and artificial production program and the understanding of the critical uncertainties as it relates to these westslope cutthroat populations. Hatchery evaluations are one component of the proposed integrated program that also addresses management of resident and adfluvial forms of cutthroat trout and evaluations of the habitat restoration program.

Specific objectives and benefits of the Coeur d'Alene Tribe Trout Production Facility include:

1. Provide interim fishery opportunities until habitat measures can restore natural cutthroat trout populations to productive self-sustaining harvestable levels.
2. Identify factors limiting the viability and productivity of native cutthroat trout populations and resolve critical uncertainties in cutthroat biology and population dynamics that currently constrain preservation and restoration planning.
3. Experimentally evaluate the feasibility of conservation-based hatchery measures for cutthroat trout protection, restoration, and use, including reintroduction and supplementation.
4. Participate as an active and fully vested partner in fish conservation, fishery development, and fish management.

In addition, this effort is in conjunction with habitat restoration in four target watersheds (i.e. Lake, Benewah, Evans, and Alder creeks - Project 1990-044-00, *Implement Fisheries Enhancement Opportunities on the Coeur d'Alene Reservation*) and is a prerequisite to realizing Phases 3 and 4. The stability of native westslope cutthroat trout populations ultimately depends on effective habitat restoration measures currently being implemented by the Coeur d'Alene Tribe in cooperation with Federal, State, and local partners.

### 3. The Three-Step Review Process

The federal hatchery analysis, completed in December 1996, took the form of a Columbia basinwide programmatic environmental impact statement (EIS) and as such, did not address specific hatchery programs or their impacts on specific populations or on the basin as a whole. Nor did the federal EIS recommend specific policies for future hatchery operations.

In July 1997, coincidental to the similar recommendation of the ISRP<sup>11</sup>, Congress directed the Council, with the assistance of the Independent Scientific Advisory Board (this is a panel of 11 scientists who advise both the Council and the National Marine Fisheries Service), to conduct a thorough basinwide review of all federally funded artificial production programs and to recommend as part of this review 1) a coordinated policy for future operation of artificial production programs and 2) means of obtaining such a policy.

Two months later, in September 1997, the Council adopted a policy that used the master planning element of its program to ensure that 1) new artificial production projects would be considered by the Council while the Artificial Production Review was under way, 2) projects would be considered in the context of their roles and potential impacts within specific subbasins and 3) projects receive detailed review recommended by the ISRP prior to approval. This policy is known as the “three-step review.” It calls for “new production initiatives” to follow a basic development process that has three main steps or phases: (Step 1) conceptual planning, represented under the 1995 Program primarily by master plan development and approval; (Step 2) preliminary design and cost estimation, and environmental (NEPA and ESA) review; and (Step 3) final design review prior to construction. In adopting the Three-Step Review Process, the Council agreed with the ISRP’s recommendation to make use of independent peer review for projects as they move through each stage of the process.

Originally the three-step review was developed as an interim process until the Artificial Production Review (APR) was completed (Document 99-15). The 2000 Program adopted the APR and defined an initial and five-year review to ensure consistency with the strategies, scientific principles, and policies defined in the APR. The initial evaluation will be completed by January 2004, and reform measures are anticipated to be initiated by July 2006.

On January 30, 2003 Council staff submitted to the ISRP the step one (i.e. Master Plan and supporting documents) documents received from the Coeur d’Alene Tribe. The step one submittal is intended to address the conditions placed on this project as part of the Three-Step Review process.

On March 17, 2003 the ISRP provided the Council with their review of the Coeur d’Alene Tribe Trout Production Facility Master Plan (ISRP 2003-5). The ISRP recommendation was not to support funding for the Coeur d’Alene Tribe Trout Production Facility. The ISRP stated that the proposal did not overcome previous scientific soundness shortcomings that it had identified in earlier reviews of the project; especially issues related to how hatchery reared cutthroat trout fit into a system that is only marginally suitable for them. The ISRP found that

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<sup>11</sup> Starting in Fiscal Year 1998, the annual prioritization process for projects funded under the fish and wildlife program included a review by the Independent Scientific Review Panel (ISRP), which the Council created in response to a 1996 amendment to the Northwest Power Act. During this initial review, the ISRP recommended a comprehensive basinwide review of artificial production. The ISRP recommended that until completion of that review, the Council “not approve funding for the construction and operation of new artificial propagation programs,” with this exception: *“To prevent a complete moratorium on new production, the ISRP recommends that the Council permit funding for an individual project only if the project proponents can demonstrate they have taken measures 7.0D, 7.1A, 7.1C, and 7.1F into account in the program design and the Council concurs. To ensure that standard is met, the individual projects should be funded only after a positive recommendation from an independent peer review panel.”*

the proposal did not provide a convincing basis to expect significant and sustained increases in adfluvial adult cutthroat trout in Reservation streams and that the proposed strategy will further stress any natural population in a stream and handicap efforts to protect wild stocks.

#### 4. Issue paper review and comment

On April 9, 2003 the Council released an issue paper (Council document 2003-03) on the master plan to invite public comment, as part of the review of a master plan, by the ISRP and Council. In particular, public comment was requested on key issues listed in this issue paper. The Council invited comment on the issue paper at the May 6 - 7 and June 10 - 12, 2003 meetings and accepted written comments through June 13, 2003. The key issues focused on genetic risk, habitat, and subbasin planning. The issue paper is not intended to constrain alternatives the Council may consider or limit Council action on this project, but to initiate dialogue with interested parties in the basin.

On June 9, 2003 written comments were received from the Idaho Department of Fish and Game (IDFG). This information was formally presented to the Council on June 10, 2003 by IDFG staff. Generally, the IDFG had concerns similar to those raised by the ISRP regarding current conditions and the reality of achieving the stated goals. In addition, the IDFG had concerns over the high costs of the proposal and suggested alternative approaches as a more cost-effective means of meeting the goals.

Based on the oral and written comments from IDFG the Coeur d'Alene Tribe requested an additional month for the public comment period<sup>12</sup> so that the alternatives suggested by the IDFG could be evaluated. As of August 1, 2003 no additional information has been received from the Coeur d'Alene Tribe.

Written comments were also received from the Upper Columbia United Tribes (UCUT) on June 26<sup>th</sup>, South Fork Trout Farm on June 2<sup>nd</sup>, and the Coeur d'Alene Tribe on June 13, 2003. In addition, comments were received from the Fish and Wildlife Service, Upper Columbia Fish and Wildlife Office, on January 21, 2003. These written comments provided support to the proposal.

#### **Analysis**

On August 1, 2003 the Council received a letter from the Coeur d'Alene Tribe providing additional comments regarding the step one review for the "Coeur d'Alene Tribe Trout Production Facility" (see Attachment 1).

The letter was supportive of the review process and requested additional time and support to address the uncertainties that exist with the proposal. This request is based on recent discussions with the co-managers that defined additional information needed to understand Coeur d'Alene Lake and achieve the Tribal goals and objectives for cutthroat trout.

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<sup>12</sup> The public comment period was originally scheduled to close on June 13, 2003. The Council addressed the request and recommended the month extension.



Based on the comments received from the Idaho Department of Fish and Game, and as expressed by the testimony that the Council received from the Coeur d'Alene Tribe at the June meeting there seems to be a need for the managers to explore other alternatives in an attempt to accomplish the goals of the proposed project. The letter received from the Coeur d'Alene Tribe on August 1, 2003 confirms these needs.

The "updated" master plan and the original master plan continue to have problems in justifying the proposed artificial production program. It seems that the proposed program does not fit into the context of the environmental conditions that exist. This is evident in the severity of the independent scientific reviews that this project has received in the provincial review and the most recent step review.

Over the past two years, the independent scientific reviews have expressed concerns and the Council has provided an opportunity for the sponsor to address these concerns on the issues raised. However, numerous attempts to propose biological and technical justification have failed. There seems to have been adequate time and guidance provided to the sponsor to have enabled them to successfully address the concerns and issues raised throughout the history of this project in the step submittal.

Understanding that the most recent submittal was intended to address conditions and uncertainties raised during the previous reviews, and given that the concerns raised by the ISRP in this review are very similar to the comments provided during previous reviews, it does not appear that sufficient progress is being made in working this project into one that the Council can be confident is scientifically sound.

Additional concerns were raised and possible alternatives were suggested by the IDFG that should have occurred at a much earlier stage in the development of this updated master plan. As expressed in comments regarding the original master plan<sup>13</sup> the IDFG had offered assistance to the Tribe with the use of an existing facility. It does not appear that this alternative was pursued seriously.

Council staff recommends that this project no longer be funded. Remaining funds should be returned to the program budget. Council staff believes that if this or a similar proposal is going to be pursued in the future, the assessment, goals and strategies of the appropriate subbasin plan will need to support it.

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<sup>13</sup> Letter dated February 3, 2000 from Idaho Fish and Game (IDFG) commenting on the issue paper (Council document 99-17) associated with the original master plan.

**Attachment 1: Letter received on August 1, 2003 from the Coeur d'Alene Tribe regarding the Step One review for Project 1990-044-02.**



**COEUR D'ALENE TRIBE**

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REFERENCE:

August 1, 2003

Ms. Judi Danielson, Chair  
Northwest Power and Conservation Council  
851 S.W. Sixth Ave. Suite 1100  
Portland, Oregon 97204

Dear Ms. Danielson:

The Coeur d' Alene Tribe submits the following comments regarding the step-1 submittal process for our Tribal trout production facility. The Tribe has continued to consider and refine the plans for the hatchery in order to maximize the potential to achieve our goals and objectives for cutthroat trout management. The step-1 process has indeed been viewed by the Tribe as an opportunity to collaborate with others to achieve that end.

In our earlier testimony to the Northwest Power and Conservation Council, we committed to initiate discussions with the Idaho Fish and Game, USFWS and others. As a result of those discussions we have assembled several positive amendments to our near term cutthroat objectives. It should be noted, however, that the Coeur d' Alene Tribe remains very supportive of the Updated Hatchery Master Plan submitted during the step process. The Tribe believes that the plan offers a credible approach to providing meaningful subsistence harvest, enhanced understanding of the fishery through specific research and monitoring, and eventual population recovery. With that said, several other short-term projects have been identified that would contribute to the Tribe's understanding of the Lake Coeur d' Alene system as it relates to our hatchery design plans. They include: 1) the development of research methodology that addresses limiting factors relating to carrying capacity and predation issues identified in peer reviews and 2) a feasibility study addressing existing infrastructure at a site identified by the Idaho Department of Fish and Game. These two initiatives would allow the Tribe to collect and analyze additional information towards achieving their cutthroat trout goals and objectives. The Tribe feels that this would be an extension of the step-1 process.

As stated in earlier testimony, the Tribe continues to grapple with difficult problems of how to restore fishing opportunities and protect native species in the face of widespread habitat changes and other actions that have eliminated historic cutthroat trout resources. The proposed hatchery and cutthroat trout restoration program is a credible attempt to address these problems. The step process has raised a variety of limitations, concerns, and objections and the Tribe has conscientiously strived to address them. The suggested alternative approaches will ensure that the Tribe is given the opportunity to address the uncertainties in a scientifically driven fashion.

Sincerely,

Alfred M Nomee  
Director of Natural Resources  
Coeur d'Alene Tribe