

Staff summary of Issues and Recommendations Role of the Fish and Wildlife Program [and Council]

*preliminary draft, please refer to full recommendations for complete review

10/29/2013 10:10 AM

Overview

Some of the fish and wildlife agencies and tribes recognized the evolving role of the Council and challenges in recent years but encourage the Council to remain engaged in ensuring full implementation and funding of the program, and report to the region on the implementation and effectiveness of the program and recommendations.

Almost universal among recommendations from fish and wildlife agencies and tribes was a desire to have the Council, through the program, serve as the a policy issue workgroup convener, coordinator of forums and symposiums, and even a definer of concepts that are important, but have remained poorly defined for many years. The program is also widely viewed as the right place to memorialize scientific principles, a sense of the long history and pre-existing conditions of fish and wildlife in the Columbia Basin as well as the long-term future vision and shorter term goals and objectives for fish and wildlife as well as research priorities and expectations for information sharing. Many in the region see the program as the right place to meld ESA recovery planning with wider fish and wildlife mitigation and restoration goals. Several recommenders suggest the program should endorse the status quo of existing activities, while several others recommend the program boldly describe the ultimate vision of a healthy ecosystem, sustainable populations of fish and wildlife and reestablishment of extirpated species into all parts of their former ranges. Many recommendations were received stating the program, and the Council, should call for opportunities for new project selection and funding for the new projects.

Recommendation Topics Synthesis

- **Respond to Changing Conditions**

With the disbanding of CBFWA the Council and the region is presented with a challenge and an opportunity to fill that gap with Council facilitated fora, workshops, policy discussion and workgroups. Some recommenders asked for an annual work plan to aid their participation. The Council is also requested to remain fully engaged in implementation decisions and providing direction to BPA on funding.

- **Role of the Council and Implementation**

Several recommenders ask the Council to be more involved in tracking the Council and program implementation recommendations and determining if the measures are being adequately funded and carried out. Also, the Council and program should be clearer the program goes beyond the ESA listed species in a significant way. There is concern by several that the Council has ceded too much oversight, decision-making and control to BPA regarding implementation. Some emphasize the need for the Council to demonstrate a clear nexus to hydropower system mitigation when making recommendations.

- **Future Focus of the program**

Some recommenders advise to Council to set healthy and harvestable goals for fish and wildlife in the Basin, not just recovery. Other recommenders look to the Council to substantially restructure the program to acknowledge the salmon and steelhead losses that they believe have gone largely unmitigated in the former anadromous zone that is now blocked to fish passage. This concern can be rectified, they recommend, by substantial new mitigation funding for those now-blocked anadromous areas. Other recommenders suggest the program should develop an annual work plan of priority issues. It is also recommended that the Council should set a policy in the program stating mitigation should extend to creating buffers around migration pathways. Several recommenders suggest the Council strengthen its role as a science partner, and in holding, compiling, synthesizing and disseminating scientific information, data and services relevant to the fish and wildlife in the Basin - particularly related to food webs, carrying capacity and climate change. There were also limited calls for the Council to provide economic data on fishing and to step back from support for the BiOp.

- **Maximize policy and program benefits and minimize program costs**

Recommenders say the Council should produce an annual calendar of topics important to the region and a forecast of the Council's agenda topics. Also, the Council should strive to become a center of scientific and research, monitoring and evaluation expertise.

- **The Council and the regional program be more effective, efficient and streamlined, and generate more value for the resource investment.**

Support integrated fish and wildlife programs throughout the region and encourage long term agreements and settlements between the fish and wildlife managers and BPA. The council is also advised to facilitate meetings on important issues between the fish and wildlife managers and appropriate federal agencies.

Existing relevant 2009 Program Section:

Section I.B, page 2, states: The Act directs the Council to develop a program to “protect, mitigate and enhance fish and wildlife, including related spawning grounds and habitat, on the Columbia River and its tributaries ... affected by the development, operation, and management of [hydroelectric projects] while assuring an adequate, efficient, economical and reliable power supply.” The Act also directs the Council to ensure widespread public involvement in the formulation of regional power and fish and wildlife policies. The Council develops the fish and wildlife program, and then monitors its implementation by BPA, the US Army COE, the Bureau of Reclamation and FERC and its licensees. To develop the program the Council requests recommendations and comments from the region's federal and state fish and wildlife agencies, appropriate Indian tribes and other interested parties. [The Council gives substantial deference to the state and tribal fish and wildlife managers.]

Recommendation Summary and Synthesis

1. Respond to Changing Conditions

- a. The Salish-Kootenai Tribe (16), the Upper Snake River Tribes (27), and the Grand Ronde Tribe (18), advise the Council that the role of the Council has evolved over time to meet the needs of the Basin and to address endangered species listings in concert with BPA. And, the disbanding of CBFWA leaves a gap in regional coordination as no one state or tribe can play a regional coordinating role, with the consequence that States and Tribes work more directly with Council Members. As such, it falls to the Council and Council staff to play a greater coordinating role that meets the needs of all regional partners in serving and informing Council decisions. An annual work plan would provide sufficient advance notice to improve preparation and participation, ensuring that all parties benefit fully from the exchanges. [Thus the Council] should continue as a regional convener of issues related to the Columbia Basin mitigation. Council should create an annual forum for states, tribes and partners to coordinate and discuss annual work priorities. The forum would result in the creation of an annual work plan to ensure that we are collectively engaged in discussions on what is most important to the Council and the region.
- b. WDFW (4) recommends the following: “Without the presence of a regional coordinating body like the Columbia Basin Fish and Wildlife Authority, the region needs the Council to assist managers in convening essential policy and science conversations, such as the policy/science workshops and forums.
- c. WDFW (4) recommends: The Council must also maintain their role in providing BPA direction in regard to adequate levels of funding. ... We acknowledge that the Council has acquired a number of new roles and challenges in recent years, but strongly encourage the Council to remain engaged in ensuring full implementation and funding of the program, and reporting to the region on the implementation and effectiveness of the Council’s program and recommendations.

2. Role of the Council and Implementation

- a. The Kootenai Tribe of Idaho (24) recommends the Council should work with fish and wildlife managers and partners to provide a periodic review of implementation of Fish and Wildlife Program measures and provide an annual report of the measures that were implemented and those that were not. In addition, because of the importance of Subbasin plans, progress towards implementation of these plans should be reported on periodically. This could be as simple as documenting which measures are currently funded and those that have not been funded.

As described in the Power Act, it is the Council’s role to provide direction regarding funding levels to BPA. The Council has the capacity to use existing tracking tools to report on which elements of the Program are funded (and at what level) and which are currently unfunded. As new measures are added to the Program, funding mechanisms will need to be identified.

The Council's Program, though tied to ESA listed species, is broader than recovery of those species. The level of effort and funding needs to be balanced within the Program and across the basin to ensure that all aspects of the Program move forward within the foreseeable future. The Council can uniquely address the needs of the ecosystem from the subbasin or basinwide perspective.

BPA has large discretion regarding funding levels, however the assumption is that measures listed in the Program are funded at some level. Tracking of these measures needs to be transparent. The cost of administering the Program needs to be kept low. As part of an annual review, annual Program administration costs should also be reviewed.

- b. The Burns Paiute Tribe (12) recommends the Council: "... should not solely allow BPA, the Agency responsible for mitigating the negative impacts of the FCRPS on fish and wildlife throughout the Basin, to determine the appropriate mitigation, goals, objectives, measures, and funding levels for those efforts. While project level accountability from the project sponsors has seen dramatic improvements over the past several years, the Tribe believes that program-level accountability has been delegated ultimately to BPA, with a narrow focus on ESA salmon and steelhead responsibilities.

"We recommend that the Council reassert their oversight role, as described in the Northwest Power Act (NPA), to provide direction regarding Program measures and funding levels to BPA."

- c. The Washington Upper Columbia Salmon Recovery Board (7) recommends the Council can continue to show great leadership across the Columbia Basin in how the region provides and markets reliable power, while also addressing the ecological effects of that approach. We suggest the following:
 - Invest in public outreach at the local level, and measure the economic impacts of these mitigation efforts.
 - Invest in the local infrastructure to facilitate and track implementation (e.g. regional boards in Washington State).
- d. WA Governor's Salmon recovery Office (5) recommends the Council: Invest in regional organizations by providing ongoing stable funding so that they can continue implementation of federally approved salmon recovery plans.
- e. WDFW (4) recommends: The Council should work with fish and wildlife managers and partners to provide a periodic review of implementation of Fish and Wildlife Program measures and provide an annual report of the measures that were implemented and those which were not. In addition, because of the importance of Subbasin plans, progress towards implementation of these plans should be reported on periodically. This could be as simple as documenting which measures are currently funded and those which have not been funded. The Council should use existing tracking tools to report on which elements of the Program are funded (and at what level) and which are currently unfunded.

- f. WDFW (4) recommends: The Council should work with fish and wildlife managers and land and water management entities to identify opportunities to coordinate BPA project funding with other funding sources as appropriate to accomplish shared goals. Fish and Wildlife Program funds could leverage shared investments that support implementation of subbasin plans, recovery plans, salmon strongholds, and other mitigation and conservation strategies. The Fish and Wildlife Program and Council should:
- Create a liaison position to assist project sponsors in identifying complimentary (cost share) grants, and
 - Develop complimentary or shared grant application formats to standardize and simplify proposal development and submission. Standard formats would also facilitate proposal review and consideration by local watershed partnerships.
- g. The Pacific Fisheries Management Council (34) advises the Council and recommends the Bonneville Power Administration (BPA) entered into nine Columbia Basin Fish Accords that are intended to supplement the Federal Columbia River Power System BiOp and the NPCC Fish and Wildlife Program. Parties to these agreements work in partnership to carry out measures intended to improve survival benefits for salmon recovery. Although these agreements commit BPA to provide funding for measures contained in the Accords, those commitments do not negate BPA's responsibility to ensure they are scientifically and technically sound and that they address regional priorities. Nor do these agreements relieve the NPCC from its responsibility to facilitate regional review and discussion of these measures involving all fish and wildlife managers in the basin and interested stakeholders. Regional review and discussion of existing and proposed measures have long been a key component of the NPCC's process for amending and implementing the NPCC Fish and Wildlife Program.

Recommendation: We recommend that the NPCC work with all regional fish and wildlife managers to ensure that an amended Fish and Wildlife Program clearly describes regional goals, objectives, and priorities for the protection, mitigation and enhancement of fish and wildlife in the Columbia Basin. These priorities should be sufficiently detailed to guide BPA's funding decisions and should include a comprehensive program to monitor and evaluate outcomes of Program measures.

- h. The BPA Customer Group (44) advises and recommends the Council: must resist pressure to move beyond the scope of funding in the NW Power Act that is focused on mitigating the effects of the FCRPS. The Program needs to be focused on the mandates in the Act in order achieve what have become increasingly significant mitigation goals. The Council has an opportunity to prioritize, eliminate redundancies, and create efficiencies during this process.

The NW Power Act assigned the responsibility for preparing the Program to the Council because the numerous and sometimes conflicting recommendations given

to the Council need to be reconciled and incorporated into a framework consistent with directives in the Act.

- i. The BPA Customer Group (44) advises and recommends the Council: the Program's given authority under the Northwest Power Act relates directly to, "fish and wildlife, including related spawning grounds and habitat, affected by the development and operation of any hydroelectric project on the Columbia River and its tributaries." As such, the Program and the projects it recommends for funding by BPA must have a clear and obvious hydro nexus.

In addition to a clear and obvious hydro nexus, the primary purpose for the recommended projects shall also be for hydro mitigation.

The Council must resist the temptation to expand the Program into measures that are not caused or related to the development and operation of the FCRPS because it will distract from the goals of the Act and dilute the effect of available funding from BPA's customers. This is especially true for calls to expand the Program to address invasive species and toxics.

- j. The BPA Customer Group (44) advises and recommends the Council: The Council needs to also recognize its responsibility to oversee the management of the Program and critically evaluate scientific recommendations that have a tendency to recommend more study and ever increasing budgets for research, monitoring and evaluation. The Program should not establish aspirational goals that lack scientific credibility. An example is the Council's proclamations concerning goals for smolt to adult returns (SARs). SARs goals are beyond the scope of the Act because they incorporate all sources of mortality throughout the fish's lifecycle, not just those caused by the existence and operation of the FCRPS. The current SAR goals provide no function in the Program and are an inappropriate basis for the Council to base any decisions in the Program.

3. Future Focus of the program

- a. US Fish and Wildlife Service (33) recommends to the Council the following context for the future role of the program: We recognize that thousands of actions are being taken, and millions of dollars are being spent, every year in the Columbia Basin to help restore Pacific salmon and other species of fish and wildlife affected by hydropower development. The extent of this regional effort is truly monumental. Although the actions, accomplishments, and funding for this effort represents one of the largest ecosystem restoration programs anywhere in the country, collectively these actions and activities are not expected to recover Pacific salmon stocks in the Columbia Basin to the extent they can be removed from the list of threatened and endangered species.

Fortunately, the Northwest Power Act created the Northwest Power and Conservation Council and mandated the development of the Fish and Wildlife Program. It's the Fish and Wildlife Program, in concert with the ESA Recovery Plans, which are developed by the National Marine Fisheries Service, that will lead to recovery. We believe the Program can point the way to ensuring healthy

and harvestable stocks of fish and wildlife, including Pacific salmon, long into the future.

- b. The Upper Columbia United Tribes (27) advise the Council that in addition to the more specific comments that follow, the UPPER COLUMBIA UNITED TRIBES (27) urge the Council to make structural changes to the Program in order to ensure that mitigation is fairly implemented across the basin. A more definitive pathway needs to be established to channel resident fish funds to the habitats above Chief Joseph and Grand Coulee dams and other blocked areas, and the Council should seriously consider expanding the resident fish budget and/or funding resident fish substitution efforts out of the anadromous fish allocation. This suggestion is in no way intended to undercut the importance of anadromous fish recovery efforts in the lower or upper river or to divert money away from critical resident fish projects elsewhere in the basin. It is simply intended to underscore the importance of channeling more of the Program's fisheries funds to the area above Chief Joseph and Grand Coulee Dams to more effectively address the multi-generational harvest deficiencies and concomitant cultural harm that the Columbia River hydropower system has visited upon members of the Upper Columbia United Tribes.
- c. The Upper Columbia United Tribes (27) recommend the Council Change the Program's historic "Resident Fish Substitution Policy" to an "Anadromous Fish Substitution Policy," which would allow both resident fish and wildlife resources to substitute for lost anadromous fish above Chief Joseph and Grand Coulee Dams.

The Upper Columbia United Tribes (27) proposed Anadromous fish substitution projects will:

- address unmitigated losses of salmon and steelhead attributable to development or operation of hydropower projects;
- generally occur in the vicinity of the salmon and steelhead losses being addressed;
- use resident fish (native and non-native fish), native wildlife, habitat, and/or data gap projects; and
- be consistent with the following priorities for Columbia River Basin resident fish.

These priorities

- should be fully considered in addressing fish losses related to development and operation of the hydropower system:
- Accord highest priority to weak, but recoverable, native populations injured by the hydropower system, as such populations are identified for the Council by the fishery managers
- Accord high priority to areas of the basin where anadromous fish are not present.

- Accord high priority to resident fish projects that also provide benefits for wildlife and/or anadromous fish.
 - Accord high priority to populations that support important fisheries. This priority applies to introduced and native species, including trout, sturgeon, kokanee, burbot, bass, perch and others.
- d. The Kootenai Tribe of Idaho (24) recommends the Council and BPA should work with States and Tribes to create an annual forum to coordinate and discuss annual work priorities. The forum would result in the creation of an annual work plan to support collective engagement in discussions on topics of high priority to the Council and representatives throughout the region. The role of the Council has evolved over time to meet the needs of the Basin and to address endangered species listings in concert with BPA. The disbanding of CBFWA leaves a gap in regional coordination as no one state or tribe can play a regional coordinating role, with the consequence that States and Tribes work more directly with Council Members. The Council and Council staff can play a valuable coordinating role (e.g., Wildlife Advisory Committee) in engaging regional partners to help inform and support Council decisions.
- e. The Kootenai Tribe of Idaho (24) recommends the following topics for increased attention in the Program over the next decade:
- Emphasis on habitat protection (acquisitions and easements) along with ecosystem restoration.
 - Reconnecting blocked habitat, floodplain, side channel, or other inaccessible habitat where advisable.
 - Creating buffers around and migration pathways between isolated areas with high species diversity.
 - Mitigate negative impacts to native species and habitat caused by introduced non-native species, including hybridization, competition and predation.
 - Habitat protection efforts should be implemented to help maintain habitat corridors that will allow species to adapt to changing climatic conditions.
- f. The Kootenai Tribe of Idaho (24) recommends the following ways the Council should exercise its responsibilities to maximize policy and program benefits and minimize process costs:
- Encourage the development of rate cases that allow the expansion of the program to include mitigation of impacts caused by dam operations, and that capture current opportunities to protect key habitats that are being lost through time to development and other incompatible land uses.
 - Consistently strive to reduce process and increase meaningful on-the-ground actions.
 - Promote and encourage partnerships whenever possible to reduce both short-term and long-term costs while also achieving landscape-scale conservation benefits.

- Increase Council's involvement in the Program budget tracking of projects and measures, and reemphasize the Council's role in providing direction regarding funding levels to BPA.
- g. CRITFC (14) recommends over the next decade, the program should:
- Support and improve the effectiveness of the workforce implementing the Program through information sharing and education.
 - Facilitate sharing lessons learned, including successes, in Program implementation.
 - Strengthen efforts to share and analyze information to support an effective adaptive management process.
 - Develop a flexible framework for adjusting the Program to incorporate impacts and actions to deal with the impacts of climate change on restoration efforts.
 - Develop and provide at the basin-wide level knowledge bases, tools and expertise (e.g. in data management, statistical analysis, GIS technology, climate change analysis) that may not be available locally and that subbasin stakeholders can draw upon as needed when developing, updating and implementing fish and wildlife restoration plans and strategies.
- h. The U S Geological Survey (38) advises the Council and recommends the NPCC, management, and regulatory agencies should instead be preparing to manage natural resources under future conditions that will intensify the current landscape scale stressors such as climate change, water shortages, contaminants, invasive species, changes in water temperatures, hypoxia and acidification in our estuary, and wildfire. The idea that "on the ground projects" can generate sufficient benefits to recover listed species held merit historically, but a more holistic approach is now needed because of impacts from landscape scale stressors originating both within and outside of the Columbia River Basin.

U S Geological Survey (38) recommends taking steps to shift the emphasis of the Fish and Wildlife Program from an approach that is curative to one that is preventative. This could be accomplished by complementing the current Fish and Wildlife Program with focused initiatives to facilitate the recovery of the ecological health of the Columbia River Basin in support of all fish and wildlife resources, such as ongoing work to restore ecosystem health of the Kootenai River. Another initiative is the Great Northern Landscape Conservation Cooperative (GN LCC), which is working to help its members prepare for, and respond to landscape scale stressors. These landscape scale stressors are national and regional scale drivers that underpin many of the specific limiting factors that NPCC restoration projects attempt to address at a local scale. By emphasizing preventative measures that help the region adapt to landscape stressors, the Fish and Wildlife Program can help the region avoid additional listings under the Endangered Species Act. Also, it can help to avoid events such as the socioeconomic disruptions that would result if zebra or quagga mussels make

their way into the Federal Columbia River Power System or if contaminants hamper a species recovery operation.

The U S Geological Survey (38) recommends that the Council, over the next five years, develop the capabilities necessary to estimate the carrying capacity of the system. The ISAB and ISRP have been calling for food web studies, which need to be conducted at a landscape scale to provide managers guidance for fish stocking and restoration. Scientific papers have already cautioned that too many juvenile salmon are being released, and now efforts to add sturgeon, lamprey and burbot are underway. Managers need guidelines for salmon stocking and fish restoration based on the capacity of the altered environments to support additional demands.

- i. The BPA Customer Group (44) recommends the Council should establish a methodology to prioritize potential projects and reach agreement on the projects of highest priority prior to recommending them to BPA.
- j. The NSIA and the ANWS (62) recommend the Council should include an initiative to collect and develop information concerning the economic benefits of fishing activities within the basin.
- k. The Northwest Resource Information Center (Ed Chaney) (61) advises and recommends the Council:
 - should propose in its draft program amendments and subsequently adopt an amendment which belatedly (30 years so) states how the Federal Columbia River Power System must be changed to comport with the Snake River salmon and salmon fisheries restoration intent of the Power Act. The Council has long known the principal elements of such a plan: i.e., sequentially breach the four lower Snake River dams and operate John Day pool at design level. The amendment should include a requirement that the Corps produce within 180 days a conceptual plan and implementation schedule to be fully completed in not more than 10 years.
 - should propose in its draft program amendments and subsequently adopt an amendment which formally recants Council support for the provisions of the NOAA Fisheries (Bonneville) Biological Opinion that do not comport with the salmon and fisheries restoration mandate of the NW Power Act and with federal court orders. To redress the damage of years of Council deception, the proposed and final amendment should unequivocally state that mainstem measures in the BiOp (including the current draft updated BiOp) cannot possibly meet the Snake River salmon and salmon fisheries restoration intent of the Northwest Power Act. In addition, and crucially, this amendment should eliminate BiOp mainstem-related measures as the “baseline” of the Program. The salmon and salmon fisheries restoration mandate of the Northwest Power Act should be substituted as the only appropriate baseline for the Program and the Power Plan the Program is supposed to drive.

- should propose in its draft program amendments and subsequently adopt an amendment formally recanting its support for the Columbia Basin Fish Accords¹⁴ which, among other fatal flaws, appear to: a. Violate the Ethics in Government Act; b. Constitute a conspiracy to illegally use federal funds to subvert the ESA and Northwest Power Act; c. Violate the recent Supreme Court decision holding illegal the use of federal funds for one purpose to force recipients to take unrelated actions. This program amendment should include a requirement that Bonneville pay the Accord/MOA-promised funds but declare null and void requirements that recipients support subverting the Northwest Power Act and other federal laws.
- should propose in its draft program amendments and subsequently adopt an amendment formally petitioning the U.S. Congress to amend the Northwest Power Act to: a. Summarily eliminate the Council; b. Have the Secretary of the Interior appoint a panel of independent experts vested with fiduciary duty and accountability to develop within 180 days a strategy and milestones for achieving the salmon and salmon fisheries restoration intent of the Power Act within a period not to exceed 10 years; c. Strip Bonneville of its power of the purse over the Fish and Wildlife Program which it has used with devastating effect to subvert the law, corrupt the public decision making process, debase the role of science and perpetrate an ecological, economic and social disaster of epic proportions.

4. Maximize policy and program benefits and minimize program costs

- a. CRITFC (14) recommends the Council should:
 - Use its resources to synthesize factual information from across the basin.
 - Minimize meetings to critical issues and recognize the costs to the basin for participation.
 - Produce and distribute annual calendar of priority topics to be discussed at the monthly meetings in order for fish and wildlife co-managers to have the ability to plan their participation for the entire year.
 - Send out NPCC's monthly draft agenda at least three weeks before the meeting.
- b. U S Geological Survey (38) advises and recommends the Council should: For almost three decades the NPCC has supported the implementation of hundreds of excellent restoration projects. While the Fish and Wildlife Program has sought to address science-based management questions through these projects, it has done so without benefit of a dedicated science component within the Fish and Wildlife Program. This explains why long standing, critical scientific data gaps still, persist, as the current funding model of project scale work in three year increments, is not designed to support the type of long term research and monitoring necessary to improve the effectiveness of the Fish and Wildlife Program, and thereby minimize costs.

The idea that fundamental science should be sponsored by the NPCC to support Fish and Wildlife Program objectives has long been recognized by many entities within the region, including the Independent Scientific Advisory Board (ISAB).

In their report on Columbia River Basin Food Webs the ISAB identified the need to "to fill a very large number of perplexing information gaps and critical uncertainties impeding progress" (ISAB 2011-1). Previously, the Scientific Review Group (precursor to the ISAB), released a report titled the Critical Uncertainties in the Fish and Wildlife Program. The first and last sentences of the summary of the report follow:

" We present and discuss critical ecological uncertainties that identify important gaps in our knowledge of the resources and functional relationships that determine fish and wildlife productivity in the Columbia River ecosystem....Finally, we again call for immediate development and implementation of a system-wide monitoring and evaluation Fish and Wildlife Program that also is responsive to critical uncertainties (SRG 93-3)."

We concur and recommend that the Fish and Wildlife Program could benefit from the inclusion of a dedicated research, monitoring, and evaluation component designed to reduce uncertainty and provide information for changing Fish and Wildlife Program focus and direction when warranted. By shrinking the uncertainty surrounding restoration options and supporting the quantification of their likely benefits, fundamental science and monitoring can help decision makers define and focus those options.

1. The Council and the regional program be more effective, efficient and streamlined, and generate more value for the resource investment.

- a. The Kootenai Tribe of Idaho (24) recommends the following ways the Council and the regional program can be more effective, efficient and streamlined, and generate more value for the resource investment:
 - Support development, formal recognition, coordinated review, and commensurate funding, of integrated fish and wildlife programs (such as the Kootenai Tribe's integrated fish and wildlife program) that acknowledges that fish, wildlife and their habitats are part of an ever evolving and interdependent ecosystem (as opposed to separate fish or wildlife projects).
 - Pursue longer-term agreements and contract terms to reduce process and allow project proponents to focus their efforts more towards on-the-ground mitigation actions. Encourage Bonneville Power Administration to fund their Fish and Wildlife Program to a level that allows for an increase of mitigation accomplishments.
- b. CRITFC (14) recommends the Council should:
 - Facilitate, not lead, discussions among resource managers (e.g. tribes, fish and wildlife managers, the Forest Service, BLM, Bureau of Reclamation, U.S. Army Corps of Engineers, state resource agencies) and land use planners (e.g. critical municipal, county and state commissions) every five years to seek ways to coordinate and leverage resource management plans, strategies and actions.

