



UCUT
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UNITED TRIBES

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March 11, 2016

Re: Critical Uncertainties Report Comments

The Upper Columbia United Tribes (UCUT) have reviewed the draft January 29, 2016 report, “*Critical Uncertainties for the Columbia River Basin Fish and Wildlife Program*” and offer the following comments. These comments apply only to the uncertainties presented on anadromous fish reintroduction. UCUT or its member tribes may provide additional comments on other critical uncertainties presented in the draft report at a later time.

The draft report considers reintroduction of anadromous fish in the context of creating “self-sustaining”, productive and resilient populations. A requirement that reintroduced populations of salmon and steelhead be self-sustaining is too narrow. How viable a salmon population must be above a barrier depends on the purpose and objective for undertaking the reintroduction. If the purpose of a reintroduction is to satisfy the Endangered Species Act, then self-sustainability in the wild is a critical objective. Alternatively, if the purpose of a reintroduction is restoration or replenishment of an ecosystem’s food web, or provision of sufficient salmon for tribes to restore their culture, spirituality, and healthy First Foods diet, then runs of fish do not necessarily require self-sustainability. The report should reflect the legal and social importance of a reintroduction’s purpose in considering critical uncertainties.

UCUT agrees that there are numerous biological uncertainties associated with reintroduction of salmon and steelhead above Chief Joseph and Grand Coulee Dams. For this reason, our tribes have supported the approach in the Fish & Wildlife Program to assess this issue through a sequence of pragmatic phases of investigation prior to full implementation.

In considering critical uncertainties, UCUT urges the Independent Science Advisory Board, Independent Science Review Panel, and Council to prioritize all uncertainties related to reintroduction of anadromous species into blocked areas.

We appreciate the opportunity to comment on the draft report.

Sincerely,

D.R. Michel, Executive Director

CC: BPA (Maslen, Grimm, Bodi)
COE (Peters, Ponganis)
BOR (Personius, Camp)
WDFW (Tweit)