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Mr. Peter Paquet

May 28, 2014

Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204-1348

RE: UCUT Proposal to Improve Wildlife Mitigation Efforts in the Columbia Basin

Dear Mr. Paquet:

The Upper Columbia United Tribes (UCUT) recognize the Wildlife Advisory Committee (WAC) as an appropriate forum for regional wildlife managers to provide direction regarding Columbia Basin wildlife mitigation. Accordingly, we submit the following recommendations (along with brief justifications where necessary) for WAC consideration in the hopes of fostering a more effective wildlife mitigation effort across the Basin.

1. *The WAC should develop a formal process for ensuring full participation of all interested Columbia Basin wildlife managers and for accurately characterizing WAC decisions.*

The WAC is currently making decisions without the participation of all interested wildlife managers in the Basin, and mischaracterizing them as consensus decisions. If these problems are not swiftly remedied, the WAC's credibility will suffer and regional participation may diminish.

2. *The WAC should support phasing out HEP as a wildlife crediting tool.*

The NPCC's Draft Amended Program continues to endorse HEP as the preferred method for estimating habitat units lost and acquired. HEP protocols and procedures were never implemented as intended and therefore, HEP has been reduced to a political tool. As HEP has outlived its usefulness, it should be phased out by December 2015.

3. *The WAC should support phasing out the Regional HEP Team (RHT) after completion of current reporting requirements, and RHT funding should be redistributed among wildlife managers to conduct more appropriate monitoring of mitigation/restoration projects.*

The time and money necessary to continue the RHT would be better spent on mitigating impacts. The RHT should also be phased out by December 2015.

4. *The Draft Amended Program's requirement that the WAC provide a recommendation for mitigating wildlife operational losses by October 1, 2015 should be expanded to include a requirement that the WAC propose a new crediting system for future-acquired mitigation lands by the same date, and that the Council should approve a new crediting system by December 2015.*

A firm plan is needed to identify and implement alternatives to HEP as soon as possible.

5. *The WAC should conditionally support the Draft Amended Program's requirement that C&I settlements be completed by 2016, and that mitigation agreements should be considered to settle operational losses in lieu of precise assessments of impacts.*

The UCUT does not agree with the term "settlements." UCUT supports long term agreements (i.e., as described in the Draft Amended Program) as a more effective means that will expedite conservation outcomes and reduce associated planning costs.

Thank you in advance for your consideration.

Sincerely,



D.R. Michel
Executive Director, UCUT

Cc: Steve Crow, NPCC Executive Director