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

September 17, 2013

Dear Mr. Bradbury:

Attached are the Recommendations for the 2013-14 Amendments to the Columbia River Basin Fish and Wildlife Program (Program Recommendations) from the Upper Columbia United Tribes (UCUT).

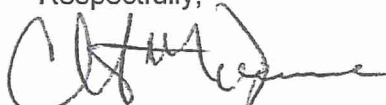
The UCUT are comprised of the Coeur d'Alene Tribe, the Confederated Tribes of the Colville Reservation, the Kalispel Tribe of Indians, the Kootenai Tribe of Idaho, and the Spokane Tribe of Indians.

The Confederated Tribes of the Colville Reservation (CCT) is a party to a Fish Accord with Bonneville Power Administration, the U.S. Army Corps of Engineers and the Bureau of Reclamation, and will be submitting a separate recommendation to the NPCC. The CCT does not join or take a position with respect to these recommendations submitted by the UCUT.

The Kalispel Tribe does not join this letter, but supports UCUT's recommendations to the extent that they are consistent with the Kalispel Fish Accord with the Bonneville Power Administration, the U.S. Army Corps of Engineers, and the U.S. Bureau of Reclamation.

If you have any questions, please contact D.R. Michel, Executive Director (dr@ucut-nsn.org; 509-954-7631).

Respectfully,



Matt Wynne, Chairman

Introduction

The Upper Columbia United Tribes (UCUT)—comprised of the Confederated Colville Tribes¹, Coeur d'Alene Tribe, Kalispel Tribe², Kootenai Tribe of Idaho, and Spokane Tribe—is co-managers of fish and wildlife in the Columbia Cascade, Mountain Columbia, and Intermountain provinces within the Columbia River Basin. In this capacity, we have a strong interest in seeing that the impacts of the hydropower system on fish and wildlife in these provinces are fully and equitably addressed by the Northwest Power and Conservation Council's Fish and Wildlife Program. The Program's existing vision is well suited to accomplish this end, as it focuses on building "a Columbia River ecosystem that sustains an abundant, productive, and diverse community of fish and wildlife, mitigating *across the basin* for the adverse effects to fish and wildlife caused by the development and operation of the hydrosystem." The Program's implementation of this vision is flawed, however, because it contains no geographical objectives to ensure that mitigation work is fairly distributed across the basin.

The governing 70-15-15 split in funding for anadromous fish, resident fish, and wildlife, respectively, is a clear manifestation of this flaw. Whereas resident fish and wildlife are present throughout the basin, anadromous fish were extirpated from the Upper Columbia River following the construction of Grand Coulee Dam in 1942 and Chief Joseph Dam in 1955. The absence of salmon and steelhead in the Upper Columbia River means that all of the Program's anadromous funding is directed elsewhere in the basin, while resident fish funding, including resident fish substitution monies, is distributed throughout the basin.

The Upper Columbia River accordingly receives approximately 10% of the Program's fish and wildlife funding even though over 40% of the basin's documented fish and wildlife losses are located above Chief Joseph Dam, and nearly 50% of the federal system's hydropower is generated at and above that project. This funding deficiency continues to add to seven decades of injury the UCUT have endured due to the elimination of their historic anadromous fisheries (estimated at 300,000 pounds per year for summer Chinook salmon alone for UCUT Tribes; Scholz et al., 1985).

One way that the UCUT have attempted to compensate for the loss of their historic anadromous fisheries is by relying more heavily on other tribal first foods, including terrestrial wildlife, resident fish, and plant resources. Expanding the availability of these resources for UCUT consumption is a critical component of offsetting the UCUT's past and continued anadromous losses. To achieve this end, the Program needs to enhance its financial commitment to anadromous substitution projects in the area above Chief Joseph and Grand Coulee Dams. More monies are needed to support the research efforts, species specific management, and/or aggressive habitat-based approaches in this area.

In addition to the more specific comments that follow, the UCUT 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

¹ The Confederated Colville Tribes (CCT) is a party to a Fish Accord with Bonneville Power Administration, the U.S. Army Corps of Engineers and the Bureau of Reclamation, and will be submitting a separate letter providing its recommendations to the Northwest Power and Conservation Council. CCT does not join or take a position with respect to this letter submitted by the Upper Columbia United Tribes.

² The Kalispel Tribe does not join this letter, but supports UCUT's recommendations to the extent that they are consistent with the Kalispel Fish Accord with the Bonneville Power Administration, the U.S. Army Corps of Engineers, and the U.S. Bureau of Reclamation.

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.

In Summary, the UCUT Propose:

Funding Priorities - Allocate at least 45% of Program funding for the geographic area above Chief Joseph and Grand Coulee Dams (where 40% of documented losses have occurred and nearly 50% of the federal system's electricity is produced), while providing adequate funding for the area above Wells Dam in order to close the largest ESA gap for recovery.

Data Management - Establish, maintain and operate an Upper Columbia Data Management Program.

Non-native Invasive Species - Develop and implement strategies to control non-native invasive fish where they negatively impact salmon, steelhead, and native resident fish.

Anadromous Fish Passage - Provide a phased approach for fish passage into their historic ranges including: (1) immediate funding for studies to investigate scientific-based feasibility, and (2) either test salmon reintroduction and interim fish passage facilities at Chief Joseph and Grand Coulee Dams, or identify additional studies and/or alternatives necessary to advance the fish passage planning process.

Toxics Reduction - Coordinate a leadership forum where governmental entities can discuss and develop a regional toxic-reduction strategy, and assess whether operational changes to hydropower projects can help mitigate the fate and transport of toxic substances due to the Columbia River Power System.

Ecosystem-based Function - Include a goal of a restored, resilient and healthy Columbia River Basin that includes ecosystem-based function based on the UCUT's recommended river and reservoir operations (in development).

Wildlife Mitigation - Create funding and project priorities in areas of the basin altered by the loss of anadromous fish by implementing long-term Wildlife Settlement Agreements or other mechanisms.

Anadromous Fish Substitution – 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.

Funding

As mentioned in the introduction to these comments, the Program has underserved the Upper Columbia River due to the absence of anadromous fish and a geographically uninformed resident fish funding strategy. Developing a set of geographical objectives is a critical step toward addressing this inequity and fulfilling the Program's existing vision. Funding priorities across the Columbia River Basin should then be developed to be consistent with those objectives.

The UCUT specifically propose the following to be included in the new Program:

- I. Set forth the Program's general funding priorities:
 - a. Protect, mitigate, and enhance fish and wildlife that have been affected by the hydropower system but underserved by the Program due to its predominant focus on endangered species and Bi-Op requirements;
 - b. Areas with the highest proportion of unmitigated construction and inundation losses (fish, wildlife, habitat, and temporally related losses) including specific priority for off-site/out-of-kind compensation mitigation opportunities towards inmitigable impacts;
 - c. Adequate project O&M funding for ongoing long-term projects (i.e., wildlife properties, fish hatcheries, etc.);
 - d. Long-term settlement agreements (i.e., Montana wildlife settlement, Willamette wildlife settlement, etc.);
 - e. Loss assessments and mitigation for un-quantified impacts (e.g., operational impacts);
 - f. Data management;
 - g. Research, Monitoring, and Evaluation;
 - h. Regional coordination;
 - i. Improving Program efficiencies; and
 - j. Updates to Subbasin Plans consistent with subbasin planning guidance and stakeholder participation.
- II. Set forth the following Program funding priority:
 - a. Allocate at least 45% of Program funding for the geographic area above Chief Joseph and Grand Coulee Dams (where 40% of documented losses have occurred and nearly 50% of the federal system's electricity is produced), while providing adequate funding for the area above Wells Dam in order to close the largest ESA gap for recovery; or
 - b. Allocate all resident fish funding to the habitats above Chief Joseph and Grand Coulee dams Upper Columbia and other blocked areas until resident fish harvest opportunities in these areas are commensurate with the combined anadromous and resident fish harvest allowed elsewhere in the Basin, and fund anadromous fish substitution projects from the anadromous allocation below Wells Dam.
- III. Make the following changes in the 2009 Program, section VIII.D.2.b:
 - a. Insert the following sentence as the first bullet: "Protect land, habitat, and water from a 'top-down' approach, prioritizing headwater habitats in the Upper Columbia and Snake Rivers.";
 - b. Change the language following what is currently the second bullet to read: "Enhance ecosystem function and species diversity over the long term in highly perturbed and novel ecosystems";
 - c. Delete the text following the first bullet in the second bulleted list;
 - d. Delete the first sentence following the second bulleted list and change the last sentence in that paragraph to: "The fund will not be used for a proposed acquisition if strong and compelling evidence is presented by both Council members from that state through an established objections process."

Data Management

The Upper Columbia United Tribes (UCUT), are co-managers of fish and wildlife within and beyond the Columbia Cascade, Mountain Columbia, and Intermountain areas of the Columbia River Basin. Within this geographic region, UCUT implement projects from the study design phases to on-the ground implementation, including monitoring and evaluation. These projects are adaptively managed using the best scientific approach and data availability. To date, data collected within the NPCC provinces by UCUT has largely been disconnected from the Basin's data management processes or projects thus lacking integration into the Basin's fish and wildlife mitigation data systems. This problem is replicated throughout the Basin as other agencies and tribes develop systems for data management that are never fully integrated. UCUT proposes to develop and manage a robust Upper Columbia data management program that will effectively support existing and newly developed data management systems in the upper Columbia River and entire Columbia Basin.

UCUT administers the Upper Columbia United Tribes Wildlife Monitoring and Evaluation Program (UWMEP) that assesses the effectiveness of restoration and management activities through the comparison of habitat cover type reference sites to permanent sampling locations on tribal mitigation properties. Nearly 70,000 tribal mitigation acres are included under the UWMEP with nearly 75,000 total acres assessed across 8 different habitat cover types. The UWMEP has evolved to a standalone project that the ISRP has explicitly supported, including broadening its reach to the entire Basin.

UCUT recommends maintaining quantitative benchmarks within the Fish and Wildlife Program and expanding them to include sustainable and useable abundance, distribution, and genetic viability objectives as interim quantitative performance objectives for Upper Columbia Basin populations and interim use of a UCUT report card to report on population performance relative to these objectives. In addition, the UCUT and the Upper Columbia Salmon Recovery Board are currently developing draft report cards that will reflect the progress toward protecting, mitigating, enhancing, and recovering focal species of fish and wildlife, including their habitats, within the provinces. The report cards will utilize established metrics in the project and recovery plans to reflect what has been accomplished historically and will describe future actions necessary to achieve the desirable biological outcomes consistent with subbasin plans.

The UCUT propose the following approach to establish, maintain and operate an Upper Columbia Data Management Program:

Phase I- Provide adequate funding to UCUT toward continuing on-going data management initiatives (e.g., UWMEP) and the development of a data management Program for the Upper Columbia River Basin consistent with ISRP/ISAB and Council monitoring and evaluation recommendations as needed for some fisheries resources and for other wildlife resources and tools (e.g., Longterm Settlement Agreement/s for Wildlife Resources).

Phase II- The Upper Columbia Data Management Program will work with the UCUT, co-managers, and applicable stakeholders towards the collection, management, and dissemination of information and the production of the Upper Columbia Fish and Wildlife Report Card and publicly accessible database that connects with the Council's High Level Indicators.

Phase III- Utilizing the Upper Columbia Fish and Wildlife Report Card, UCUT will work with the member tribes, co-managers and applicable stakeholders in identifying and addressing limiting factors, environmental, and adaptive management changes necessary for accomplishing ongoing biological goals and objectives of the fish and wildlife managers.

Non-Native Invasive Species

The Upper Columbia United Tribes (UCUT), are co-managers of fish and wildlife in three provinces within the Columbia River Basin (Columbia Cascade, Mountain Columbia, and Intermountain provinces). Hydropower construction and operations have altered the natural hydrology and ecology of these two provinces, creating additional habitat for non-native fish. The transformation of the Columbia River and its tributaries from a free flowing system to a system dominated by reservoirs has created opportunities for non-native invasive fish to establish and reproduce rapidly outside their range. These non-native invasive fish threaten the diversity and abundance of native fish by exposing them to predation, competition for resources, parasitism, and hybridization.

The predatory effects of non-native invasive fish species on native fish are the most well documented of all non-native impacts on native fish in the Columbia Basin. Detrimental effects to native fish due to competition for resources and hybridization are also well established. To mitigate these problems, it is critical that the Program adequately fund the suppression and/or eradication of non-native invasive species. The Program also needs to support a coordinated regional strategy to control all invasive species (e.g. rusty crayfish, Eurasian milfoil, knapweed) that threaten the integrity of the Program's aquatic and terrestrial investments. This effort is particularly important as the effects of climate change are expected to further accelerate the expansion of invasive species, often at the expense of native species.

The UCUT propose the following to be included in the new Program:

- I. The Council should work cooperatively with NOAA Fisheries, U.S. Fish and Wildlife Service, states and tribes to develop and implement strategies to control non-native invasive fish where they negatively impact salmon, steelhead, and native resident fish according to the following priorities:
 - a. Highest priority given to suppressing and/or eradicating non-native invasive fish species that negatively impact salmon, steelhead, and native resident fish due to predation.
 - b. Second highest priority given to suppressing and/or eradicating non-native invasive fish species that negatively impact salmon, steelhead, and native resident fish due to competition and hybridization.
- II. Currently an Environmental Risk Assessment for all resident fish substitution projects in which a non-native species is to be selected for substitution is required. The UCUT recommends that this requirement be expanded throughout the Columbia Basin in locations where management of non-native invasive fish overlaps with native fish conservation and endangered species listings.
- III. The UCUT recommends that the Council coordinate with organizations and programs that track and monitor data on existing non-native invasive species distribution throughout the Columbia Basin. Emphasis should be on rapid response, prevention, containment, control, eradication, enforcement, education, and outreach, and may include participation in local, state, tribal, regional, national, and international efforts regarding invasive species. Public awareness of the threats that non-native invasive species pose to aquatic ecosystems and the native species therein is critical for curtailing the introduction and spread of new non-native species. Planning for future actions to prevent, control, and minimize non-native species' impacts to native species and their ecosystems should be a priority.
- IV. Add the following definitions to the Council's Program:
 - a. **Non-native species:** A species living outside its native distributional range, which has arrived there by human activity, either deliberate or accidental.
 - b. **Non-native invasive species:** A species that establish and reproduce rapidly outside of its native range and may threaten the diversity or abundance of native species through predation, competition for resources, parasitism, hybridization with native populations, introduction of pathogens, or physical or chemical alteration of the invaded habitat.

Anadromous Fish Passage

The Upper Columbia United Tribes (UCUT), are inextricably connected to the salmon and steelhead resources of the Columbia River. Historical estimated annual consumption of salmon and steelhead by UCUT tribes ranges from 6.8 million to 13.1 million pounds. An estimated 4,000 to 5,600 tribal fisherman congregated at key fishing sites in the United States portion of the Upper Columbia basin.

The construction of Grand Coulee Dam in 1942 and later Chief Joseph Dam in 1955, blocked access of anadromous fish to the upper portions of the Columbia River. The importance of the salmon and steelhead to the tribes is far reaching. The loss of salmon affected indigenous peoples in many ways including economic, emotional, spiritual and ceremonial losses, dietary impacts, social exchange effects, and lost traditional skills, language, and knowledge. Current day initiatives have re-invigorated the linkages to salmon by way of sharing the salmon resources of the Upper Columbia basin that are currently accessible to salmon and steelhead.

To continue in a direction that increases accessibility of salmon and steelhead to native peoples, the UCUT continue to pursue the goal of re-establishing salmon and steelhead to habitats above Chief Joseph and Grand Coulee Dams. The Northwest Power and Conservation Council's Fish and Wildlife Program has referred to the areas above Chief Joseph and Grand Coulee Dams as "blocked areas." The UCUT recommend reference to these areas as "Habitats Above Chief Joseph and Grand Coulee Dams." Fish passage into their historic range will involve a phased approach and UCUT recommends the following:

Phase I- Immediately fund studies in the period covered by this Program to investigate scientific-based feasibility of upstream and downstream passage options for salmon and steelhead, investigations to determine project timelines, appropriate potential donor stocks, evaluation of existing quantity, quality and capacity of salmon habitat in the upper basin, simulate hydro operations, and assess socio-economic implications of different hydrograph scenarios. Develop stakeholder and regulatory support for passage and associated communication plans.

Phase II- Utilizing information gained through Phase I, test salmon reintroduction and interim fish passage facilities at Chief Joseph and Grand Coulee Dams or identify additional studies and/or alternatives that are necessary to advance the fish passage planning process.

Phase III- Construct permanent juvenile and adult passage facilities and propagation facilities necessary to reintroduce salmon and steelhead above the dams. Continue to inventory, record, implement, and maintain priority habitat improvements and habitats above Chief Joseph and Grand Coulee dams for the reintroduction of anadromous fish.

Phase IV- Monitor, evaluate, and adaptively manage the reintroduction efforts. Implement additional habitat and hydro-related infrastructure improvements as necessary.

Toxics Reduction

Despite a host of environmental laws designed to control them, toxic substances are prevalent throughout the Columbia River Basin. Many of these substances have never been cleaned up even though they were released into the environment decades ago. Some have been the target of incomplete or unsuccessful cleanup efforts. Others continue to be imported into the Basin or generated and released within the Basin under the auspices of federal permits. However they end up in the Basin, toxic substances continue to migrate within and beyond the Basin, causing widespread problems wherever they have been or are currently located.

Although it is not clear at this time that the Program should be responsible for funding the reduction of toxic contamination within the Basin, there is no question that the Program can and should be part of the solution. Toxic contamination can harm the fish, wildlife, and other biota that are critical to the success of the Program, as well as people who drink contaminated water or consume contaminated fish or wildlife. If the Program does not take on more of a leadership role to protect its investment in the ecological restoration of the Basin, it is likely that this investment will be undermined by a toxic reduction effort that has faltered under the leadership of the federal and state agencies charged with that responsibility.

The UCUT propose the following to be included in the new Program:

- I. The Council shall coordinate a leadership forum where governmental entities can discuss and develop a regional toxic-reduction strategy. In addition to whatever priorities are identified at this forum, components of the strategy shall include:
 - a. An accurate description of the existing footprint of toxic substances within the Basin, including the location of any authorized discharges or other sources;
 - b. Identification of the principal sources of toxic substances imported into the Basin;
 - c. A coordinated process for identifying new contaminants of concern; and
 - d. A 30-year implementation schedule to achieve toxic reduction objectives, with decadal benchmarks, that could be used to inform a state or federal legislative response.
- II. The Council shall assess whether hydropower projects exacerbate any problems associated with the migration or effects of toxic substances; if any such correlation exists, the Council shall assess whether operational changes or other activities could help mitigate these impacts.

Ecosystem-based Function

Since time immemorial, the rivers of the Columbia Basin have been, and continue to be, the life blood of the Columbia Basin tribes. Columbia Basin Tribes view ecosystem-based function of the Columbia Basin watershed as its ability to provide, protect and nurture cultural resources, traditions, values and landscapes throughout its length and breadth. Clean and abundant water that is sufficient to sustain healthy populations of fish, wildlife, and plants is vital to holistic ecosystem-based function and life itself.

The Columbia River Power System negatively impacted ecosystem-based function in the Columbia River Basin and caused significant loss of the fish and wildlife resources the Tribes and others rely upon. The UCUT recommend the following measures to protect remaining fish and wildlife resources, mitigate for the losses caused by the CRPS to those resources, and enhance the resources:

The UCUT propose that the new Program include a goal of a restored, resilient and healthy Columbia River Basin that includes ecosystem-based function such as:

- Improve normative spring, summer and winter flows resulting in a more natural hydrograph;
- Higher and more stable headwater reservoir levels;
- Restoring and maintaining fish passage to historical habitats.
- Higher river flows during dry years;
- Lower late summer water temperature;
- Reconnected floodplains throughout the river including a reconnected lower river estuary ecosystem as well as reduced salt water intrusion during summer and fall;
- Columbia River plume and near shore ocean enhanced through higher spring and summer flows and lessened duration of hypoxia;
- An adaptive and flexible suite of river operations responsive to a great variety of changing environmental conditions, such as climate change;

A final river and reservoir operations alternative that more adequately fulfills Ecosystem-based Function is in development in the 2014/2024 Columbia River Treaty Review, and is proposed for inclusion in the Program. Proposed specific river/reservoir operations that result in Ecosystem-based Function potentially include:

- 1) Spring flow target at The Dalles Dam of 500-600 Kcfs;
- 2) Minimum Lake Roosevelt Elevation of 1,260ft. (1,240ft. in dry water years);
- 3) Dry Water Year Strategy (driest 50% of water years);
- 4) VarQ at Libby and VarQ-plus at Hungry Horse (with the goal of maximizing downstream temperature benefits for native fish and other aquatic species in the Pend Oreille River);
- 5) Adequate and updated level of Flood Risk Management: local flood control; protect downstream infrastructure; allow higher spring freshets (esp. low-water years); stabilize upriver reservoirs;
- 6) Revised hydropower operations at Mica, Arrow, Grand Coulee, and Libby dams.

Improved ecosystem-based function in the Columbia Basin Watershed is expected to result in at least:

- Increased protection and preservation of tribal first foods and cultural/sacred sites and activities. First foods include water, salmon, other fish, wildlife, berries, roots, and other native medicinal plants.
- An estuary with an enhanced food web and increased juvenile fish survival;
- Increases in juvenile and adult salmon survival;
- Decreased mainstem travel time for migrating juvenile salmon;
- Increased resident fish productivity that provides stable, resilient populations;
- Increased wildlife and habitat productivity that provides stable, resilient vegetative communities and wildlife populations;
- Native juvenile and adult, anadromous and resident fish passage to historical habitats in the Upper Columbia and Snake River basins, and into other currently blocked parts of the Columbia River Basin.

Wildlife Mitigation

Due to the tremendous shift from past use of anadromous fish (estimated at 300,000 pounds per year for summer Chinook salmon alone; Scholz et al., 1985) and a subsequent increased reliance on terrestrially based tribal first foods, tribes in the blocked areas of the Columbia River Basin need the ability to use terrestrial wildlife and plants to help offset the loss of salmon production. The UCUT recommends the following:

Complete Construction and Inundation Losses (C&I losses) mitigation as identified in past Program guidance through long-term settlement agreements with each entity or groups of entities as appropriate. Continue to fund adequate long-term Operations and Maintenance (O&M) and enhancement/restoration activities to maximize habitat benefits to target C&I species consistent with past Program guidance. Once completed, transition Program efforts into off-site/out-of-kind anadromous fish mitigation for terrestrially based tribal first foods through research, species specific management, and/or aggressive habitat-based approaches.

Increase wildlife mitigation funding to concurrently address the needs and mitigation opportunities for Operational and Secondary Impacts (O&S impacts). Use adaptive management principles based upon the quantitative data and performance based benchmarks as outlined under the UCUT Data Management recommendations to account for future O&S obligation tracking. Priority should be given to funding for wildlife O&S impacts in habitats above Chief Joseph and Grand Coulee dams and other blocked areas of the basin because an aggressive habitat-based approach with research and species specific management are necessary to attempt full mitigation to Tribes in such areas. These efforts need to be negotiated through long-term settlement agreements as a priority, or other instruments consistent with this and past Program guidance. Such agreements or instruments should ensure:

- C&I Losses are fully addressed to the extent identified and as required under the Northwest Power Act.
- O&S Impacts to the extent that anadromous fisheries have been eliminated and wildlife resources have been additionally impacted shall also be mitigated for on an ongoing basis (as well as monitored and evaluated for effectiveness and efficiency, adaptively managed, and reported on), through methods that include but are not limited to: 1) increase native and managed habitats to support additional numbers of wildlife game species and food plants; 2) protect additional lands for native and managed habitat availability to Tribes in habitats above Chief Joseph and Grand Coulee dams and other blocked areas of the Basin; and 3) add value to current existing managed habitats by providing funds for management through affected Tribes and their surrounding areas of interest.
- Long-term O&M will be continually and adequately funded for all mitigation actions.
- Monitor habitat changes and management using UWMEP methods and protocols as described under the UCUT Data Management recommendations, and other ISRP endorsed methods and protocols as an inherent part of these recommendations.
- Additional Program funds to manage priority habitat areas (including but not limited to: tribal reservation, private, or other federally-managed lands) for tribal terrestrial associated first foods.

Anadromous Fish Substitution Policy

Due to the tremendous shift from past use of anadromous fish (estimated at 300,000 pounds per year for summer Chinook salmon alone; Scholz et al., 1985) to an increased reliance on other terrestrially based tribal first foods, tribes in the habitats above Chief Joseph and Grand Coulee dams need the ability to use terrestrial wildlife, resident fish, and plants to help offset the loss of salmon production.

In its analysis of the contribution of the hydropower system to salmon and steelhead losses (see Council documents 87-15, 87-15A and 87-15B), the Council has addressed the extent to which resident fish, wildlife, habitat and substitutions should be used to mitigate losses of Anadromous fish production in these areas.

The Council has concluded that: 1) mitigation in blocked areas is appropriate where salmon and steelhead were affected by the development and operation of the hydroelectric projects; 2) to treat the Columbia River and its tributaries as a system, resident fish substitutions are reasonable for lost salmon and steelhead in areas where in-kind mitigation cannot occur; and 3) flexibility in approach is needed to develop a program that complements the activities of the fish and wildlife agencies and tribes and is based on the best available scientific knowledge. For substitution purposes, resident fish may include landlocked anadromous fish (e.g., white sturgeon, kokanee and coho), as well as traditionally defined resident fish species. Historically mitigating for lost anadromous fish with resident fish was known as the “Resident Fish Substitution Policy”. The UCUT proposes to change the definition of this policy to “Anadromous Fish Substitution” to accurately reflect the intent of this policy.

The UCUT 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.