



Colville Confederated Tribes

Fish and Wildlife Department

P.O. Box 150

Nespelem, WA 99155

Phone: 509-634-2110



October 6, 2006

Mr. Mark Walker, Director of Public Affairs
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204

Dear Mr. Walker:

The Colville Confederated Tribes (Colville Tribes) offer the following comments on the Northwest Power and Conservation Council's (Council) draft fish and wildlife funding recommendations to the Bonneville Power Administration (BPA) for the fiscal years 2007 through 2009.

Several Council provincial (Columbia Cascade and Intermountain) recommendations have been identified by the Colville Tribes as warranting additional attention and modification. They include: 1) including capital budget needs for the Chief Joseph Hatchery Program (200302300); 2) restoring full funding to the Okanogan Basin Monitoring and Evaluation Project (200302200); 3) restoring full funding to the Omak Anadromous Fish Habitat and Passage Project (200000100); 4) providing full funding for the McIntyre Dam Feasibility Study (200600100) and the Salmon Creek Restoration and Enhancement Project (199604200); 5) providing full funding for the Locally adapted steelhead supplementation project (200721200); and 6) full funding for the Rufus Woods Project (20072700).

Columbia Cascade Province

The Colville Tribes assert that the Columbia Cascade Province has been the most under-funded province both historically and as currently reflected in the Council's latest draft funding recommendations. The Interior Columbia Technical Review Team (ICTRT) identified the salmonid populations within the ESU of the Columbia Cascade Province as the most imperiled salmon and steelhead populations, yet the province is proposed to receive only 3.7% of the total funding allocated to salmon and steelhead. Despite over twenty years of low level funding for the Columbia Cascade Province, the Council is proposing to fund only 12.1% of the Colville Tribes requested funding to recover upper Columbia River salmon and steelhead. These anadromous fish populations are most affected by the development and operation of hydroelectric projects. The Colville Tribes feel strongly that the allocation of federal funds directed to the recovery of endangered upper Columbia Spring Chinook and threatened upper Columbia summer steelhead need to be at least equal to ESU's which contain stronger populations. The Colville Tribes offer the following project specific comments:

Chief Joseph Hatchery Program (200302300)

The Colville Tribes request that the Council reflect the total capital funds as identified in our 07-09 project proposal. These funds are critical to the Colville Tribes efforts to secure substantial cost-sharing from other sources. An additional \$28,560,596 in capital resources need to be added to the 08-09 funding recommendations.

Okanogan Basin Monitoring and Evaluation Project (OBMEP) (200302200)

The OBMEP budget has been drastically cut by \$1,605,249 (60% reduction) for the identified 07-09 period. The initial Washington recommendation reduced the budget by \$705,249 with an additional reduction of \$900,000 due to a spreadsheet miscalculation. This budget reduction would eliminate or compromise several core elements of the project including: 1) smolt monitoring; 2) water quality monitoring; 3) methods and design work; 4) production of compliance permits; 5) discharge gauge expansion; 6) tributary video and weir monitoring; 7) elimination of Malott escapement enumeration efforts; 8) invertebrate monitoring; and 9) addressing subbasin planning data gaps. Ultimately, information collected through this effort reflects trends or responses by anadromous salmonids to habitat improvements throughout the basin. Without this information, effectiveness from habitat rehabilitation and management efforts would be virtually unknown.

The OBMEP project was identified as the highest total score (relative to criteria developed by the Independent Scientific Review Panel (ISRP) and the overall benefit to salmon and steelhead populations) by the Upper Columbia Salmon Recovery Board's (UCSRB) technical evaluation. It also received a fundable ISRP recommendation. The project is also a core ESA project toward the recovery of listed UC steelhead. The Colville Tribes request that the Council fully restore the OBMEP budget to the originally proposed funding level of \$2,693,249.

Omak Anadromous Fish Habitat and Passage Project (200000100)

This core ESA (UC steelhead) project has focused on implementation of several actions including road decommissioning, riparian vegetation planting, removal of fish passage barriers, channel restoration, and construction of fences to reduce impacts caused by cattle within the Omak watershed. Over the past 9 years, these rehabilitation efforts have resulted in adult steelhead returns from 20 to in excess of 200. The Colville Tribes request that the project be fully funded to the \$564,272 amount reflected in the original proposal for the 07-09 period. This will allow rehabilitation efforts, such as road decommissioning, culvert replacements and infrastructure to reduce impacts upon habitat by livestock to continue. These efforts have and will continue to result in reduced stream temperatures and percent of fine sediment within well established spawning reaches. The \$214,272 reduction will all but eliminate these efforts resulting in a stalling of an aggressive increasing trend in population size. This project received the third highest technical score (Fish category) by the UCSRB's technical evaluation and a fundable ISRP recommendation.

McIntyre Dam Feasibility Study (200600100)

This core ESA (UC steelhead) project addresses a feasibility study and design for fish passage upriver of McIntyre Dam. This project will provide access to an estimated 11km of mainstem Okanogan River as well as 10+ miles in Shuttleworth Creek. Sockeye and summer Chinook salmon and summer

steelhead would directly benefit from the implementation of this project. This project received the second highest technical score (Fish category) by the UCSRB's technical evaluation and a fundable ISRP recommendation. The Colville Tribes request that the project receive full funding which is identified at \$2,065,795.

Salmon Creek Restoration and Enhancement Project (199604200)

This core ESA project would provide access to Salmon Creek, a major potential contributor to the recovery of UC steelhead once reconnected. This project has secured a 12 year water lease with the Okanogan Irrigation District (OID) which will provide steelhead access to Salmon Creek upstream of the OID's diversion. In addition, this project would construct a low flow channel downstream of the diversion to increase the duration of flow originating from the water lease. Previous water releases have resulted in successful summer steelhead spawning and smolt production. The project received the fifth highest technical score (Fish category) by the UCSRB's technical evaluation and a fundable ISRP recommendation. This subbasin has been identified as crucial for UC steelhead production by the ICTRT. The Colville Tribes request that the project receive full funding which is identified at \$2,808,000.

Locally Adapted Steelhead Supplementation Project (200721200)

This core ESA project addresses the use of a locally adapted steelhead broodstock toward the recovery of the UC steelhead population. The Council has identified \$1,130,000 of capital resources to fund the implementation of the supplementation infrastructure identified through the three-step process (in fiscal year 2009). However, the Council has not recommended any resources for the design and planning elements of the three-step process for fiscal years 07 and 08. The Colville Tribes request \$528,297 for 07 and 08 to accomplish objectives associated with the Council's three-step process.

Intermountain Province

Lake Rufus Woods Subbasin Area Stock Assessment, Habitat Assessment And Fisheries Evaluation Program (20072700)

The Colville Tribes have been purchasing and releasing large triploid rainbow trout in Lake Rufus Woods since the mid 1990s with no data to evaluate the success of the program. This fishery was developed to provide a Tribal subsistence fishery of large salmonids in lieu of the lost opportunity to harvest salmon (Resident Fish Substitution). This project is critical for the proper management of the most heavily fished waterbody on the Colville Reservation. Lake Rufus Woods provides for both a Tribal subsistence and non-tribal recreation fishery. The ISRP's continued misconception of the proposal resulted in a do not fund status. Rufus Woods is between the two largest hydroelectric dams on the Columbia River mainstem and received a provincial recommendation to fund if additional funds became available. It was at the top of the Tier 2 list at the provincial level and is consistent with the resident fish substitution policy. The work elements have been prioritized and the budget reduced by nearly \$100,000 per year. The Colville Tribes request that the project receive 07-09 funding at \$1,731,876.

The Colville Tribes appreciate the opportunity to comment on the Council's draft 07-09 recommendations and look forward to our continued collaboration with the region toward meaningful enhancement, protection, and restoration of our valuable Columbia River fish and wildlife resources.

Sincerely,

A handwritten signature in black ink that reads "Joe Peone". The signature is written in a cursive style with a large initial "J".

Joe Peone, Director
Fish and Wildlife Department

cc:

Mr. Greg Delwiche, BPA
Mr. Bob Lohm, NOAA