

1. Introduction -- description of framework concept, structure and elements/outline of program organized as a framework/explanation of how revised program will work

Source: National Marine Fisheries Service
Recommendation No. 54

Recommendation: The Service agreed with the structure and fundamental elements of the proposed program framework, as well as the proposed geographic organization -- basin, province and subbasin -- for implementing the framework.

Finding: With minor exceptions the recommending entities supported the proposal to reorganize the program around the framework concept and elements suggested by the Council prior to the program amendment process. The final amendments reflect this reorganization.

Source: Oregon Department of Fish and Wildlife
Recommendation No. 26

Recommendation: Oregon recommended an edited but substantively similar version of the introduction in the staff-prepared Strawman, which described the structure and elements of the proposed program framework. The part of the recommendation that differed most from the Strawman was the section titled “Summary of how a revised Fish and Wildlife Program should work.” That part of the recommendation is further summarized here:

- *Policy and scientific framework.* In the year 2000, the Council should adopt a policy and scientific framework for its program composed of a vision, objectives, strategies and implementation standards and scientific principles for the basin and program as a whole and for subdivisions of the basin called ecological provinces.
- *Subbasin assessments and plans.* The Council should call on the region to develop and implement subbasin assessments and plans that will ultimately be adopted by the Council as part of the program. Subbasin assessments should identify the biological potential of each subbasin and the opportunities for mitigation and restoration. Based on these assessments, subbasin plans should be developed consisting of goals, objectives, strategies, and proposed actions. The subbasin plans should be consistent with the vision, biological objectives, strategies, implementation standards, and scientific principles in the program framework. Subbasin plans should guide development and implementation of fish and wildlife projects necessary to implement the program.
- *Annual project reviews.* Under the Northwest Power Act, the Council has the responsibility for conducting an annual review of projects proposed for funding by the Bonneville Power Administration to implement the Council’s program. While subbasin plans are being developed, the Council should work with the fish and wildlife managers and the Independent Scientific Review Panel to complete annual project reviews in a manner consistent with subbasin planning. At a minimum, projects should be consistent with the vision, biological objectives, strategies, implementation standards, and scientific principles in the program framework.
- *Monitoring and evaluation.* The Council should emphasize the need and priority for monitoring and evaluating the benefits gained by actions taken under the program. The evaluation process should feed information back into the program planning and project review process, with adaptive management mechanisms for revising program objectives and actions on the basis of the success or failure of actions implementing the program.

- *Existing measures in the program.* Unless expressly modified by this policy and scientific framework, existing measures in the program should continue to be in effect.

Finding: The introduction to the Strawman, and to Oregon’s recommendations, proposed the reorganization of the fish and wildlife program around a framework concept of visions, objectives and strategies, to be developed and implemented across different geographic scales, from the basin as a whole, to subdivisions of the basin labeled ecological provinces, to subbasins. The introduction to the revised program as adopted in the Phase 1 amendments differed in wording from the Strawman and from Oregon’s recommendation, but not in meaning or content, with one exception: Oregon’s recommendation and the Strawman both anticipated that the Council would adopt, in the Phase 1 amendments, specific biological objectives and other framework elements for the ecological provinces. The Council did not do that, largely because the set of recommendations that the Council received did not include specific content for the framework elements at the ecological province level, even as most entities supported the concept. Instead, the Council adopted the province-level structure and organization, but otherwise decided to continue discussions with regional parties over the appropriate methods and timing for developing province-level objectives and adopting them into the program. *See* Sections III.C.3, IV.B, IX.3.

Source: Columbia River Inter-Tribal Fish Commission
Recommendation No. 40

Recommendation: The Commission also recommended an edited but substantively similar version of the Introduction in the Strawman, adding in particular that the Council needs to be mindful of its statutory duties to the Indian tribes of the Columbia Basin. In treaties and executive orders, the United States agreed to protect the rights of the tribes to take certain fish and wildlife resources. The Northwest Power Act specifically references these agreements and the Council should fully comply with the Act’s standards in this regard.

The Commission also urged the Council to lead the region by emphasizing action over process in the next program. Subbasin planning and scientific reviews are important, but the new program needs to be action-oriented and founded upon achievement of quantitative biological objectives, which will meet tribes’ treaty rights.

The Commission recommended that all on going tribal/Commission projects under the current program should remain in effect and are fully supported by tribes for continuation.

The Commission also recommended a marked-up version of the Introduction to the 1994-95 Fish and Wildlife Program. One particular recommended addition illustrates the content of these edits, and is summarized here: The 2000 Fish and Wildlife Program should build upon the lessons learned over the past seven years of emphasis on implementation of Endangered Species Act measures. First, implementation of the current biological opinions has not arrested the decline of listed salmon. The decline of wild spring/summer chinook appears to be accelerating. Second, most existing biological opinions lack performance measures based upon the biological requirements of fish and wildlife. For example, biological opinions governing land and water management actions are not adequately linked to salmon abundance. To the extent that performance measures do exist, they are inadequately enforced. In some cases, performance measures are openly flouted, e.g., applicability of state water quality standards to Corps of Engineers dams. In other cases, performance standards are too vaguely crafted to be enforced or, if specific, lack timelines for achievement and are thereby rendered impotent. Finally, some

performance standards may be so loosely linked to the biological needs of salmon that their achievement is meaningless.

Thus the 2000 Fish and Wildlife Program should adopt performance standards that are based on the biological needs of salmon. Activities proposed should be linked to fish and wildlife abundance. It is contrary to the best available science for harvest to be the only activity regulated on the basis of resource abundance. Salmon program measures need to be selected on the basis that they will adequately contribute to the smolt-to-adult returns needed to recover listed species, rebuild the runs, and comply with treaty and trust obligations to Indian tribes. Implementation of the program, as a whole, should be designed to result in creating the normative conditions necessary to stem the declines and eventually rebuild Columbia basin fish and wildlife populations consistent with the Regional Act and other applicable laws. The success of the program will depend upon the active support and participation of federal, state, and tribal governments along with their commitment to expeditious implementation. There is no time left to lose.

Finding: The introduction to the revised program differed in wording from the Strawman and from the Commission's recommendation, but not in meaning or content, reorganizing the fish and wildlife program around a framework concept of visions, objectives and strategies, to be developed and implemented across the different geographic scales of the basin. Because the Council decided to jettison and not simply amend the Introduction to the previous program, the Council did not make use of the edits provided by the Commission. Substantive provisions of the revised program, including the vision, the biological objectives, the habitat-based program and habitat strategies and the implementation provisions, are consistent with the concepts recommended by CRITFC for the introduction.

The Council expressly addressed the rights and roles of the tribes in Section VII.1 of the revised program. Substantive provisions throughout the program, such as the reference to providing abundant opportunities for tribal harvest in the statement of the Vision in Section III.A.1, also recognize the relationship of the program to the activities of the tribes, the Council's Power Act responsibilities to the tribes, and the federal government's trust and treaty obligations to the tribes.

The Transition Provisions, *see* Section IX, preserve the measures in the program that are the basis for on-going projects as the Council works to complete the subbasin plans and the revision of the program.

Source: Yakama Nation
Recommendation No. 24

Recommendation: The Yakama Nation recommended that the Council simplify and clarify the fish and wildlife program. The new program should clearly state that it is primarily a watershed restoration effort. A watershed has clearly identifiable components (ocean, estuary, mainstem, tributaries, etc.) that can be isolated and put into an understandable and proper planning context. Similarly, the components and their attendant problems can be hierarchically organized by decreasing size by beginning at a regional or basin-wide scale, then to a landscape scale, then to a stream corridor scale, a stream scale, and finally even down to the stream reach scale. The goal should be to produce an understandable document that clearly outlines the problem, how the problems are being addressed within the component parts of the watershed, prioritizes and allocates resources in a responsible fashion, and emphasizes scientifically defensible ecological restoration practices.

The Yakama Nation noted that it had previously indicated an increasing intolerance with excessive planning and research camouflaged under the banner of a need for “good science,” as opposed to actual on the ground projects that will put fish in the river. However, the process is so close to achieving a level of planning that truly represents an ecological systems approach that will silence further criticism, that it was willing to support any additional effort that will bring it to a successful conclusion.

Timing is crucial to be able to access additional Bonneville funds -- the Council should not deviate from planned completion schedule. If the Phase 1 amended program can be developed on schedule, i.e. by the end of August, 2000, additional Bonneville funds could be made available in the 2001 fiscal year to address immediate action items identified in the program.

Finding: The revised program is consistent with this recommendation. The program has been reorganized around a geographic and topical framework that emphasizes subbasin/watershed level planning and implementation, intended to be an integrated habitat-based program that seeks to accomplish its goals as much as possible by protecting and restoring the natural ecological functions, habitats, and biological diversity of the Columbia River Basin. The Council completed Phase 1 in the time hoped for, and is calling for and seeking funding in Fiscal Year 2001 both for high priority (or immediate action) items and for the resources needed to engage in subbasin planning and complete the program revision.

Source:	Spokane Tribe
Recommendation No.	28
Source:	Montana Fish, Wildlife and Parks
Recommendation No.	31
Source:	Colville Confederated Tribes
Recommendation No.	33
Source:	Burns-Paiute Tribe
Recommendation No.	34
Source:	Idaho Department of Fish and Game
Recommendation No.:	36
Source:	Shoshone-Bannock Tribes
Recommendation No.	38
Source:	Coeur d’Alene Tribe
Recommendation No.	42
Source:	U.S. Fish and Wildlife Service
Recommendation No.	46
Source:	Kalispel Tribe
Recommendation No.	48
Source:	Kootenai Tribe
Recommendation No.	50

Recommendation: These fish and wildlife agencies and tribes recommended that the program as a whole be based on the following principles:

- The purpose of the program is to protect, mitigate, and enhance fish and wildlife affected by the federal hydropower system.
- An important tool to achieve this purpose is to direct the Bonneville Power Administration funding.

- There are three basic sources of the Bonneville authority for funding fish and wildlife activities: the Act; the Endangered Species Act; and legislation authorizing (and mitigating for) the federal hydropower system.
- The Bonneville fish and wildlife budget has three different kinds of costs, which are treated differently but are subject to review and coordination under the program: Capital Investments (which require separate Congressional authorization); Reimbursables (which Congress adopts and Bonneville reimburses); and, Direct Expenditures (which Bonneville just pays).
- The program amendments should be based on existing laws. No legislative actions are proposed.
- The current program should be retained in the new program until amended by subbasin plans.
- The amended program should delineate the decisions required, the process and criteria by which the decisions should be made, and the roles of those affected by the decisions.
- The program should have a clear description of a straightforward process by which the region makes decisions regarding Bonneville fish and wildlife funding. This process should be based on existing legal authorities and should provide the basis for and spell out the roles of the involved parties.
- The program should present the standards or criteria by which these decisions are made. This will allow all participants in the program to know how their efforts will be judged and allow the public to hold decision-makers accountable.
- The program should retain the current measures that serve as the basis for ongoing implementation.

Idaho's recommendation did not include what is summarized in the last three bullets. The Fish and Wildlife Service's recommendation included only what is in the last three bullets as well as a recommendation that in order to protect, mitigate and enhance fish and wildlife affected by the hydrosystem, the program should have an overall goal and a set of regional objectives, strategies and implementation standards and scientific principles.

Finding: Although not worded exactly as here, the revised program is consistent with these recommendations -- directing the planning and implementation processes necessary to secure Bonneville funding for the program, consistent with the protection and mitigation obligation in the Power Act; an overall goal and set of objectives, strategies and standards and provision for developing the substantive content of these framework elements in future steps; a description of the standards and procedures for further planning and implementation; preservation of existing measures in the program until replaced by specific objectives and measures in adopted mainstem and subbasin plans; and provisions for integrating the program with Endangered Species Act and other fish and wildlife responsibilities.

Source:	Spokane Tribe
Recommendation No.	28
Source:	Coeur d'Alene Tribe
Recommendation No.	42
Source:	Kalispel Tribe
Recommendation No.	48
Source:	Kootenai Tribe
Recommendation No.	50

Recommendation: These four tribes generally supported for adoption into the program the Introduction in the Strawman describing the proposed framework concept, structure and elements, as well as similar language in the Council's "Form for Recommendations" published April 11, 2000.

The program should recognize that the Bonneville Power Administration has constitutionally mandated trust responsibilities to all Columbia Basin tribes. The new fish and wildlife program must recognize and uphold these trust responsibilities. The Council recommends how Bonneville is to spend federal fish and wildlife mitigation funds, and therefore these recommendations must be consistent with Bonneville's trust responsibilities to the tribes. The Council should help realize part of this trust responsibility by paying deference to tribal programs and projects that are consistent with the policies and guidelines of the program.

Each tribe used quite different wording to reflect the following concept, but without apparent difference in meaning: The program should also include language providing that all measures in the existing 1994-95 Fish and Wildlife Program continue to be funded for implementation until explicitly modified or replaced through a subbasin planning process in which all the fish and wildlife managers have participated, including the Spokane, Coeur d'Alene, Kootenai and Kalispel Tribes as sovereign tribal governments.

Finding: The introduction to the revised program differs in wording from the Strawman and thus from these tribes' recommendation, but not in meaning or content, reorganizing the fish and wildlife program around a framework concept of visions, objectives and strategies, to be developed and implemented across the different geographic scales of the basin.

The Council expressly addressed the rights and roles of the tribes consistent with the recommendation in Section VII.1 of the revised program, including recognition of the federal government's trust obligation toward the tribes affected by activities covered in this program.

The Transition Provisions, *see* Section IX, preserve the measures in the program that are the basis for on-going projects as the Council works to complete the subbasin plans and the revision of the program.

Source: Shoshone-Bannock Tribes
Recommendation No. 38

Recommendation: Of primary importance to the Shoshone-Bannock Tribes was the fact that the program has to carry the federal government's obligations to the tribes and those treaties, executive orders, and agreements that the tribes of the Columbia River Basin solemnly entered into with the United States. Federal consultation is a component of fulfilling this requirement, and it is called for in the Power Act and is necessary because the Council's fish and wildlife program is the product of federal law.

Finding: The Council expressly addressed the rights and roles of the tribes consistent with this recommendation in Section VII.1 of the revised program, including recognition of the federal government's trust obligation toward the tribes affected by activities covered in this program. The revised program recognizes that completing and implementing the program and subbasin plans will require interaction, cooperation and consultation with the tribes. The Council commits to working with the tribes in a relationship that recognizes the tribes' interests in co-management of affected fish and wildlife resources and respects the sovereignty of tribal governments.

Source: Umatilla Tribes
Recommendation No.: 41

Recommendation: The Umatilla Tribes recommended retention of the current program measures in the new program until replaced by subbasin plans.

Finding: The Transition Provisions, *see* Section IX, preserve the measures in the program that are the basis for on-going projects as the Council works to complete the subbasin plans and the revision of the program.

Source: Kootenai Tribe
Recommendation No. 50

Recommendation: The Kootenai Tribe recommended that the revised program state that restoration of the fish and wildlife resources in the basin will take a tremendous commitment from Bonneville Power Administration and the Council to approve and fund necessary actions. The resources of the entire basin, from fish and wildlife to berries and sacred sites, are important to the life and the culture of the tribe. The Council needs to be committed to work with the Kootenai Tribe to further develop and refine the recommendations by the tribe through further comments, consultations, and hearings.

Finding: The Council expressly addressed the rights and roles of the tribes consistent with this recommendation in Section VII.1 of the revised program, including recognition of the federal government's trust obligation toward the tribes affected by activities covered in this program. The revised program recognizes that completing and implementing the program and subbasin plans will require interaction, cooperation and consultation with the tribes. The Council commits to working with the tribes in a relationship that recognizes the tribes' interests in co-management of affected fish and wildlife resources and respects the sovereignty of tribal governments.

The Council recognizes that Bonneville may need to increase its already substantial contribution to the needs of fish and wildlife affected by the development and operation of the hydrosystem. The revised program states its support for Bonneville's pledge to "meet all of its fish and wildlife obligations," as stated in the administration's Fish and Wildlife Funding Principles of September 1998. *See* Section VI.4 of the revised program.

Source: Coeur d'Alene Tribe
Recommendation No. 42

Recommendation: The Coeur d'Alene Tribe objected to the Council adopting its amended program without first reconciling the amendment process with the federal process for modifying the NMFS and USFWS ESA Biological Opinions. The tribe also objected to implementation of a revised program before the program has been completely revised in a manner consistent with the recommendations of the agencies and tribes of the basin. The Council has inhibited meaningful deliberation and precluded all options for restructuring the program in any manner other than the manner predetermined by the Council (comprehensive subbasin plans were the only option considered). All measures incorporated in the Council's existing fish and wildlife program must continue to be funded for

implementation until explicitly modified or replaced through a subbasin planning process in which the Coeur d'Alene Tribe has participated as a sovereign tribal government.

Finding: The recommendations of other agencies and tribes and of other entities, as well as the comments received on the draft program, indicate wide acceptance of the framework restructuring of the program and of the importance of subbasin plans as the key focus for specific planning and implementation.

With regard to the Endangered Species Act concern, the Council believes it has addressed this issue appropriately in the revised program, consistent with this recommendation. With regard to off-site mitigation (that is, habitat and production activities to enhance fish and wildlife in the tributaries away from the areas directly affected by the hydrosystem), the Council has taken steps, consistent with the recommendations and comments of the National Marine Fisheries Service and others, to coordinate and even integrate the Endangered Species Act planning and implementation into the overall program activities of subbasin planning and project review. This will assist the region in meeting its ESA obligations while also addressing the broader mitigation obligation under the Power Act. With regard to hydrosystem operations undertaken to protect species listed under the Endangered Species Act, but which also affect non-listed resident fish that are important to this program, the revised program calls for the fish and wildlife managers and operating agencies to be aware of the needs of other species and to explain how these needs can best be balanced or accommodated. Operating conditions to meet the needs of these other species are, on an interim basis, those adopted by the Council in Section 10 of its 1995 program, recommended then by the Coeur d'Alene Tribe and the other tribes in the upper Columbia. In instances where flow management needs conflict, the program calls for system operators to identify the potential conflict and seek recommendations from the Council, fish and wildlife agencies and tribes and other affected entities on how best to balance the different needs. And the Council calls for the hydro operations forum established by the federal agencies to oversee ESA-based operations be jointly sponsored with the Council, in part to ensure the proper balance and protection of all fish and wildlife species protected by the hydrosystem, as required by the Power Act. Finally, whether different or more specific operating conditions and procedures are needed to balance the needs of ESA species with other species will be one of the major topics in the mainstem planning phase of the program revision process, to occur in 2001.

The Transition Provisions, *see* Section VIII, preserve the measures in the program that are the basis for on-going projects as the Council works to complete the subbasin plans and the revision of the program.

Source: Bonneville Power Administration
Recommendation No. 37

Recommendation: The introduction to the Strawman emphasized that one key to the revised program would be that project funding recommendations would depend on the consistency of the project with the goals and objectives of the revised program and the relevant subbasin plan. Bonneville recommended that the standard be even stronger: To be recommended for funding, a non-research project should be required to show how it will aid in the fulfillment of the goals and objectives of the program in a measurable way, with a plan for reporting results through monitoring and evaluation. A project needs to be more than “not inconsistent”; it needs to actively support the program’s goals and objectives.

Finding: The revised program is consistent with this recommendation. It calls for subbasin plans to contain goals and objectives that are consistent with the program’s overall goals and objectives,

as well a set of actions to achieve the objectives. Project proposals for funding under the program must be based on the subbasin plans and explain how the project should contribute to meeting the goals and objectives of the subbasin plan and the program. The program then also calls for project-level, subbasin plan-level and programmatic-level monitoring and evaluation to determine if in fact projects are fulfilling the objectives.

Source: PNUCC
Recommendation No. 55

Recommendation: PNUCC noted that the Council is taking an important step toward developing a more structured and logically consistent fish and wildlife program by developing the conceptual framework. The Strawman provided the basic elements for improving the Council's decisions in the next program. This framework, when supported with a rigorous scientific foundation, should provide the region a badly needed comprehensive plan for "recovering" and "protecting, mitigating and enhancing" the fish and wildlife that inhabit the Columbia River Basin. Past programs have not provided a vision with clear biological goals to successfully guide decisions about funding proposed measures. And, as past programs have shown, a planning process lacking clarity and structure results in decisions primarily based on politics rather than clearly articulated biological and economic goals. PNUCC was supportive of the new more structured approach and hopeful that the effort would accelerate the region's efforts to recover listed salmon and steelhead populations.

Finding: The revised program adopted the framework as proposed in the Strawman and approved in this recommendation. The Council believes the overall vision, the objectives and the strategies and implementation provisions stated in the revised program are an appropriate starting point for guiding decisions and evaluating actions in the manner recommended here, if properly completed with more specific goals and objectives in later phases of the program amendment process.

Source: Idaho Water Users
Recommendation No. 18

Recommendation: The Idaho Water Users recommended that the program introduction explain that general statements of vision, ecosystem characteristics, strategies, and principles set forth at the basin level will be adapted to each ecological province as appropriate. For example, although flow augmentation may be appropriate in select provinces, it will not be appropriate in all provinces.

The concept and foundation underlying the proposed framework for the fish and wildlife program are not well developed in the request for recommendations or the Strawman. Much more detail on these two parts must be provided so that people in the Pacific Northwest can adequately review and comment on the concepts and foundation of the program amendments. The Council should distribute as soon as possible a preliminary draft of the framework concept and foundation so that comments can be reflected in the draft amendments.

Finding: The draft revised program, and the public hearings and consultations following the issuance of the draft, provided a regional opportunity to review and comment on the framework structure and elements. The comments were largely supportive of the approach; specific issues are addressed at the appropriate places throughout these findings.

The program recognizes that the differences among the provinces will allow for different objectives and strategies that are appropriate to the conditions of the provinces. This is the purpose for more specific planning and implementation at the finer geographical scales based on a general set of standards.

Source: Columbia River Alliance
Recommendation No. 39

Recommendation: The Columbia River Alliance recommended that the Council abandon regional government supervision of habitat restoration. Repeated costly failures demonstrate that state and local entities will produce more effective efforts, particularly if improved harvest management rewards localities that invest in habitat restoration by allowing salmon and steelhead to return to the improved habitat. Limit the regional governmental role to that of providing a clearinghouse for information about successful habitat restoration strategies.

Finding: The Council agrees that the primary responsibility for planning and implementation under the program should be at the subbasin and watershed level, not at the regional or basinwide level, and provided for this in the revised program through subbasin planning that includes significant reliance on local and state entities. And the program recognizes the need for improvements in coordinating production and harvest management to allow localities that invest in habitat restoration to realize the benefits of that investment.

On the other hand, the Council is called upon to develop a systemwide, regional fish and wildlife program to protect, mitigate and enhance fish and wildlife across the basin affected by the hydrosystem and to guide Bonneville's investment of ratepayer revenues in that effort. Moreover, many of the important fish and wildlife species affected by the hydrosystem and thus important to the program have a life-cycle that transcends any particular locale, subbasin and state. And many of the hydrosystem operations and other activities that affect fish and wildlife habitat are similarly broad in geographic scope (e.g., water management is a systemwide action). As indicated in the large majority of recommendations and comments, and not just those from the fish and wildlife agencies and tribes, most of those interested in the program agree on the need for a regional or programmatic set of goals, objectives, standards and implementation provisions. Their purpose is to guide the allocation of regional dollars to the local activities that show the most promise in meeting the goals of the Power Act and the program, and to allow the Council and others to evaluate whether a disparate set of local planning and implementation actions add up to an overall program that is successful at mitigating the adverse impacts of the hydrosystem on the wide-ranging species and population structures in the basin. On that basis, the Council rejected this recommendation in part because it does not complement the activities and recommendations of the region's fish and wildlife agencies and tribes, Northwest Power Act §4(h)(6)(A), (7)(B), and because it would be less effective than what the Council did adopt in the protection, mitigation and enhancement of anadromous fish, resident fish and wildlife, §4(h)(7)(C).

Source: Northwest Resource Information Center, Inc.
Recommendation No. 51

Recommendation: The Northwest Resource Information Center, Inc. stated that Snake River anadromous fish were the *raison d'être* for the Council's program under the Power Act. Unfortunately, as we approach the 20th anniversary of the Act, these fish are threatened with extinction. The Council

should -- 20 years late -- give Snake River anadromous fish first priority in fulfillment of the letter and intent of the Northwest Power Act.

Finding: The Council rejected this recommendation as inconsistent with the Northwest Power Act, because it does not complement the activities and recommendations of the region's fish and wildlife agencies and tribes, Northwest Power Act §4(h)(6)(A), (7)(B); and because it would be less effective than what the Council did adopt in the protection, mitigation and enhancement of anadromous fish, resident fish and wildlife, §4(h)(7)(C). The Power Act requires the Council to develop a program to protect, mitigate and enhance Columbia River fish and wildlife affected by the development and operation of the hydrosystem, with special consideration to "anadromous fish which are of significant importance to the social and economic well-being of the Pacific Northwest and the Nation and which are dependent on suitable environmental conditions substantially obtainable from the management and operation of Federal Columbia River Power System and other power generating facilities on the Columbia River and its tributaries." The Power Act does *not* assign the first priority to Snake River anadromous fish. Anadromous fish across the basin, as well as resident fish and wildlife, have been adversely affected by the hydrosystem, and the Council has a corresponding obligation to provide mitigation opportunities across the basin for these affected fish and wildlife.

The program has in the past and will continue in the future to direct an enormous amount of attention and resources not just to anadromous fish, but to Snake River anadromous fish in particular. To assign Snake River fish first priority, however, would not be consistent with the activities and recommendations of the fish and wildlife agencies and tribes, which address fish and wildlife across the basin affected by the hydrosystem and which have *not* recommended assigning Snake River anadromous fish first priority under the program.

Source: Hiram Li -- Oregon Cooperative Fish and Wildlife Research Unit
Recommendation No. 16

Recommendation: Mr. Li expressed support for the multi-species framework concept, a regional approach to the basin's fish and wildlife problems, adaptive management, large-scale experiments, and using the framework approach to address gaps in understanding, set goals and evaluate progress.

Finding: The revised program has been reorganized around framework elements and a scientific foundation consistent with this recommendation.