



25 W. Main, Suite 434
Spokane, WA 99201
t 509.838.1057
f 509.209.2421
ucut.org

Dear Northwest Power and Conservation Council,

October 9, 2015

Based on the inability of the Northwest Power and Conservation Council's Wildlife Advisory Committee to define operational and secondary impacts, the Upper Columbia United Tribes would like to share our suggested definitions that have been approved by all five of our member tribes. It is our recommendation that the following definitions be adopted into the Columbia River Basin Fish and Wildlife Program and that by defining these impacts each of the individual member tribes of UCUT can move towards negotiating long term agreements with Bonneville Power Administration.

UCUT Recommendation for Operational and Secondary Loss Definitions

Introduction:

For the purpose of clarifying the NPCC Program definitions, operational and secondary impacts refer to the negative impacts to terrestrial wildlife species from the past, present and future operations of the Federal Columbia River Power System. These impacts have not been defined, assessed, or mitigated since the construction of the hydropower projects or the establishment of the NW Power Act in 1980. Construction and inundation losses did not include operational and secondary impacts related to the hydropower projects that affect the UCUT. Mitigation for operational and secondary impacts need to address all operations that have negative impacts on terrestrial wildlife, including, but not limited to, hydropower operations, flood control operations and fish flow mitigation. Historically low funding levels have created barriers in achieving mitigation which has lead the region's managers to take a more stepwise approach in addressing wildlife impacts to the extent impacted as required by the Power Act.

- 1) **Operational Impacts:** Impacts to wildlife through direct operations (power production, flood control, fish flows, and etc.) of the hydropower projects that negatively affect wildlife habitats and/or ecological processes.
- 2) **Secondary Impacts:** Impacts to wildlife from direct and indirect hydropower development that have or had negative effects on wildlife habitats or ecological processes, but have not been mitigated by construction and inundation losses or Operational Impacts.

Sincerely,

UCUT Chairman, Mel Tonasket