

The UCUT Proposal to Implement Subbasin Plans in the Upper Columbia Ecoregion

A response to questions

What is the “UCUT Proposal”?

- The Upper Columbia United Tribes (UCUT) propose a comprehensive approach to implement adopted subbasin plans in the Upper Columbia Ecoregion.
- Approach is comprehensive because it encompasses scientific review, specific biological outcomes, and a regional allocation of BPA funding.

Why did the UCUT develop this proposal?

- Desire to move from plans to implementation – achieve PM&E results on-the-ground.
- Recognition that BPA's budget can/should not cover all watershed needs.
- Desire to move toward equitable regional allocation of BPA funding.

What steps did UCUT take?

1. Timely submittal of subbasin plans (subsequently reviewed by ISRP and adopted by NWPCC).
2. Submittal of measures (as required by NWPA) during comment period (adopted by NWPCC).
3. Submittal of 10-year estimate of costs to implement plans at reasonable pace.

UCUT steps (continued)

4. Submittal of proposal for 10-year funding agreement with formula for regional allocation.
5. Submittal of table of biological outcomes to be achieved with regional share of funding over 10 years.

How did UCUT determine all measures are BPA's responsibility?

- UCUT member Tribes' managers, with many years of involvement in the NWPPC Program, are distinctly familiar with BPA's obligations under NWPA.
- UCUT actively seek/obtain other sources of funding, both to address non-BPA needs and to maximize effectiveness of BPA \$\$.

Examples of distinguishing BPA's responsibility vs. others'

- Kalispel Tribe uses BPA money to restore riparian habitat along fish-bearing stream, but obtained combination of USFS and DOT \$ to address a Forest Svc. Road causing siltation in that stream.
- Spokane Tribe uses BPA & Tribal money to acquire wildlife habitat, adds NRCS money for watershed restoration on interior streams.
- Kootenai Tribe uses BEF, NRCS, EPA and other grants to augment planning, restoration and enhancement activities.

More examples:

- Coeur d'Alene Tribe uses federal, state, BEF and Tribal \$ to complete restoration and enhancement work.
- Colville Tribes enhance mitigation habitat with BIA road maintenance, fire protection, law enforcement, forest enhancement & range management; Tribal GIS, helicopter monitoring, greenhouse stock, archaeological services; County weed control; private landowner fence maintenance.

How much money is involved in UCUT proposal?

- Implementing all measures at a reasonable pace over 10 years is estimated at average \$45.3M/yr. expense and capital combined
- Amounts vary each year. Range \$38.7-61.92M/yr.

How much \$\$? (continued)

- If stable funding is provided over 10-years, with flexibility to adjust internally, the stable average is reduced to \$29M expense and \$13.5M capital (\$42.5M combined).

45.3 – 42.5 = \$2.8M difference in average
+ stabilized, instead of variable annual range

Why does UCU propose 10 years of funding?

- 10-yr. funding gives predictability to both budget and field managers; helps stabilize demand on ratepayers.
- Cost savings are from: reduced process costs, ability to take advantage of opportunities and prioritize internally.

For example: implement phases in logical sequence; adjust to seasonal needs and weather; cooperative prioritization of opportunities to acquire habitat or purchase bulk/discounted materials; efficient use of staff time in field instead of in budget/contract meetings.

What costs would be covered with this amount of funding?

- These amounts address anadromous fish, resident fish, and wildlife, listed and non-listed species, in the 4 subbasins of the Inter-Mountain Province, plus the Okanogan subbasin and the Kootenai subbasin.
- The funded measures would include projects of all 5 UCUT Members Tribes and their management partners. (Other managers may have projects outside scope of this proposal.)
- The cost projections include expense and capital categories, and inflation at 3%.

Would this amount be in addition to other F&W costs?

- No.
- UCUT costs are in the Integrated Program budget.
- UCUT amount would remain the same, regardless whether Integrated Program budget remains at \$139/36M, or increases.
- If no increase, would redistribute to Upper Columbia Ecoregion.
- U.C.E. still <23% expense, @37.5% capital budgets, covering 8 headwater subbasins that incorporate @_____ % of Basin area.

What is the method for equitable allocation of funding to Upper Columbia Ecoregion?

- UCUT proposal gives all 62 subbasins an equal base amount (unless full 1/62 not justified).
- Adjust that base to equitable apportionment.
- Mitigate proportional to fish and wildlife losses and relative to benefits derived from each dam (JCCA allocation or Hydro O&M allocation).

What is the JCCA?

■ Chief Joseph	100%	■ Bonneville	50%
■ Albeni Falls	97.5%	■ Black Canyon	50%
■ Libby	78%	■ Green Peter	49.5%
■ Hungry Horse	68.7%	■ Foster	49.5%
■ Grand Coulee	79.7%	■ Big Cliff	40.5%
		■ Detroit	31%
		■ Dexter	31%
		■ Lookout Pt.	31%
■ Dworshak	87.4%	■ Hills Creek	24.5%
■ McNary	81.3%	■ Cougar	23%
■ The Dalles	74%	■ Anderson Ranch	5%
■ John Dan	77.5%	■ Minidoka	1.4%
		■ Palisades	1.4%

Why is a JCCA/impacts-benefits analysis appropriate?

■ Think of this analogy:

If federal power system used coal, instead of river water & habitats, as fuel, and the quarry that produced the greatest quantity of highest quality coal also left the largest mine to be reclaimed, unreasonable to shirk responsibility for reclaiming the biggest and most productive mine and run out of reclamation money focusing on mines that produced smaller quantities of lower quality coal.

Formula for allocation

- 1/62 base amount (if needed)
- + ~ 1/62 for anadromous losses $\geq 37\%$
- + ~ 1/62 for wildlife losses $\geq 37\%$
- (- ~ 1/62 for HU's complete at 1:1 ratio)
- + ~ 1/62 if facility JCCA $\geq 70\%$
- (- ~ 1/62 if JCCA $\leq 10\%$)

This approach addresses mitigation for disproportionate impacts in Blocked Areas and moves toward mitigation proportional to relative impacts and benefits of hydropower facilities.

Other weighting criteria include:

- Consistent with 70/15/15 % anad/res/wildlife
- Consistent with 75/20/5 % on-the-ground
- Focuses effort in historically under-mitigated areas
- Provides long-term benefits to fish and wildlife
- Continual scientific approval as best science
- Historical success meeting project goals and economic efficiency
- Addresses PM&E of Tribal fish, wildlife, cultural interests
- Addresses Power Act/ESA/other legal obligation
- Consistent with long-term contract (such as hatchery or wildlife O&M)
- Provides “credit” toward a BPA obligation
- Has actual/potential opportunity for leveraging other F&W resources

A draft illustration applying the UCUT concept:

Inter Mountain Province

Base Exp. 6/62 of \$127M	\$12,290,000
Adjust. for 40% impact to wildlife and salmon	\$ 3,687,000
JCCA above 70%	<u>\$ 2,667,000</u>
Expense sub-total	\$18,644,000
Capital	<u>\$ 9,000,000</u>
Total	\$27,644,000
(without considering other weighting factors)	
<i>Max. historic Allocation</i>	<i>\$11,000,000</i>

How does proposal address regional goals?

- Supports 70/15/15 percentage allocation to anadromous, resident fish and wildlife.
- Supports BPA goal of 70/25/5 percentage allocation to put more \$\$ on the ground.
- Supports longstanding NWPCC Program goals of mitigation in Blocked Area.
- Represents spending BPA \$ only on projects that are BPA's responsibility.

How does proposal move toward achievement of goals/closure on BPA obligation?

- Wildlife habitat units at 3 dams (at 1:1) would be acquired and move into O&M mode.
- Some resident fish substitution goals (for lost anadromous fish) would be realized (see table of biological outcomes).
- Okanogan anadromous stocks, as itemized.
- Addresses ESA-listed anadromous and resident fish, and species on borderline of listing.

Other questions?