



The Confederated Tribes of the Colville Reservation

Colville Business Council
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June 23, 2025

Maryalice Fischer
Certification Program Director
Low Impact Hydropower Institute
329 Massachusetts Avenue, Suite 2
Lexington, MA 02420

Re: Information to Support Douglas County Public Utility Districts application for Low Impact Certification of the Wells Hydroelectric Project

Dear Mrs. Fischer:

Thank you for the opportunity to comment on Douglas PUD's application for low impact certification of the Wells Project. On behalf of the Confederated Tribes of the Colville Reservation (CTCR), a sovereign nation and member of the Upper Columbia United Tribes (UCUT), I am writing to acknowledge Douglas PUD's support and cooperation of the CTCR's efforts to reintroduce Pacific salmon upstream of Chief Joseph and Grand Coulee dams, which have blocked fish passage to the Upper Columbia River Basin since the 1940's. Douglas PUD has consistently demonstrated a forward-thinking, collaborative approach to resource stewardship in the Upper Columbia River Basin. A prime example of this leadership is the District's voluntary support for the Phase 2 Implementation Plan (P2IP), which is a regionally coordinated effort led by UCUT to assess the feasibility of reintroducing Pacific salmon and restoring anadromy above Chief Joseph and Grand Coulee Dams. Participation in this effort is not required under Douglas PUD's existing license for the Wells Project, making their involvement all the more commendable. In 2019, the first adult salmon transported by the tribes into the Upper Columbia blocked area since the construction of Grand Coulee Dam were from the DPUD's Wells Fish Hatchery. These fish supported tribal ceremonies at three locations including Kettle Falls, which historically was the location of the most productive fishery in the Upper Columbia. Since 2019, DPUD has provided access to live adult surplus hatchery salmon at Wells Hatchery to support the reintroduction with hundreds of fish every year, which was a cornerstone to garnering support and momentum for the project with elected officials and federal agencies.

Douglas PUD's contributions to salmon reintroduction are substantial and deeply appreciated by the Colville Tribes, including:

1. At no cost to the tribes; entering into facility use agreements with tribal partners, which provide access for tribal scientists and technicians to collect surplus salmon at the DPUD's facilities for tribal subsistence and live trap and transport of adult salmon for ceremonial and research needs.

2. At no cost to the tribes; supplying/sharing acoustic telemetry data of tagged adult salmon, which is critical to understanding fallback behaviors both below Chief Joseph Dam and within the Wells Project area. These data are expected to inform future passage design and success criteria.
3. At no cost to the tribes; planning, coordinating and developing implementation options at DPUD's facilities for other salmon reintroduction needs such as juvenile salmon rearing, holding and research.
4. Providing adult holding space at the Wells Fish Hatchery for disease testing and quarantine, which enabled the culturally significant and ceremonial release of adult salmon into the blocked area upstream of Chief Joseph and Grand Coulee dams. This is an important step in restoring both salmon and tribal traditions.
5. Raising more than 160,000 sub-yearling Chinook salmon annually at the Wells Fish Hatchery, supporting telemetry-based behavioral studies that are advancing knowledge of juvenile migration behavior and survival potential in the blocked area.
6. Implementing a returning adult sort-by-code system, which will help identify adult salmon returning to the Columbia River that are destined for the blocked area, thus enhancing monitoring and management of these valuable fish. Most importantly, this project allows for some of the returning fish to be repatriated to their natal waters.

These actions underscore a Douglas PUD's voluntary and meaningful commitment to tribal salmon restoration goals, ecosystem recovery, and ethical hydropower practices. The Colville Tribes recognize that Douglas PUD has gone beyond regulatory obligations to actively support this historic opportunity to restore salmon to the Upper Columbia River.

We respectfully offer this information in support of Douglas PUD's application for Low Impact Hydropower certification of the Wells Hydroelectric Project.

We appreciate your time and consideration of these comments. If you would like to discuss this matter or would like further information, please contact Neeka Somday, Legislative Assistant/Policy Analyst, at (509) 634-2213 or by email at neeka.somday@colvilletribes.com

Sincerely,



Jarred-Michael Erickson
Chairman
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CC: Shane Bickford, Douglas PUD