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Low Impact Hydropower Institute
329 Massachusetts Avenue, Suite 2
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Submitted electronically to comments@lowimpacthydro.org

Subject: Information to Support Douglas PUD's Application for Low Impact Certification of the Wells Hydroelectric Project

Dear Low Impact Hydro Institute,

On behalf of the Upper Columbia United Tribes (UCUT), I am providing comments on Douglas PUD's application for Low Impact Hydropower Institute (LIHI) certification of the Wells Hydroelectric Project. Douglas PUD has shown exceptional and voluntary partnership with the UCUTs in the Phase 2 Implementation Plan (P2IP)—a regionally coordinated effort to restore Pacific salmon to the blocked reaches of the upper Columbia River. Douglas PUD's approach and support of P2IP embodies the LIHI mission to “*recognize and support hydropower that prioritizes environmental, recreational, historical, and cultural resource protection.*”

Since time immemorial, Indigenous Peoples of the Columbia Basin relied on a healthy and connected ecosystem that supported abundant salmon runs and resilient resident fish populations. That all changed with the development of non-salmon passing dams along the Columbia River and its tributaries, which fragmented the ecosystem and limited fish movement. To right these historic wrongs, the five Member Tribes of UCUT have taken the lead on reintroducing salmon, restoring resident fish habitats, and reconnecting fish, water, and people.

The P2IP is a critical milestone in that mission. Developed by the Upper Columbia United Tribes, the plan is advancing the science and logistics needed to safely and successfully reintroduce anadromous salmon above Chief Joseph, Grand Coulee, and three Spokane River dams. At an immeasurable cost to the Tribes of the Upper Columbia, these waters have been devoid of returning salmon for over 80 years. This comprehensive effort includes fish health assessments, juvenile and adult salmon telemetry, ecosystem risk modeling, fish passage considerations and many other community and cultural integration approaches.

Douglas PUD's voluntary participation in P2IP, despite having no requirement under their Federal Energy Regulatory Commission (FERC) license for the Wells Project, represents a model of collaborative stewardship and Tribal partnership. Their contributions to P2IP have been meaningful and are actively advancing the restoration goals of the region. These contributions include:

1. Providing adult holding space at the Wells Fish Hatchery for disease testing, which enabled the ceremonial release of adult salmon into the blocked area; a moment of deep cultural significance for UCUT member Tribes.
2. Sharing acoustic telemetry data of tagged adult salmon, which informs our understanding of fallback behavior below Chief Joseph Dam.
3. Raising more than 180,000 subyearling Chinook salmon at the Wells Hatchery to support in-river behavioral telemetry studies. These fish have and will continue to advance data on downstream migration success in blocked areas.
4. Implementing a returning adult sort-by-code system to identify and track salmon returning to the Upper Columbia River that are destined for areas above the Chief Joseph, Grand Coulee, and Spokane River dams.
5. Entering into facility use agreements at the Wells Fish Hatchery and with Tribal partners, allowing Tribal scientists and technicians to collect surplus salmon for subsistence use, cultural purposes, and scientific research.
6. Voluntarily sharing standard operating procedures and engineering plans for the Wells Fish Hatchery Adult Handling Facility with UCUT funded contractors that are working on developing similar facilities as part of the P2IP.

Douglas PUD's non-license required—yet proactive involvement—reflects a clear understanding that ethical hydropower operation includes accountability to the environment and Native American communities most impacted by historic dam development. Their partnership enhances the collective capacity of UCUT and its Member Tribes to restore ecological balance, rebuild fish populations, and revitalize cultural traditions linked to salmon.

Thank you for providing the opportunity to comment on Douglas PUD's application for Low Impact Hydropower certification. We encourage the Low Impact Hydropower Institute to recognize the unique and impactful contributions Douglas PUD is making to fish restoration and Tribal sovereignty in the Columbia Basin.

Please feel free to contact me or UCUT Policy Analyst, Laura Robinson (laura@ucut-nsn.org; 509.209.2411), with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "D.R. Michel".

D.R. Michel
Executive Director
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