

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
US Dept of Interior	1	We encourage you, in coordination with the UC BAAF working group, to engage with stakeholders in the Upper Columbia, including irrigation districts and power customers. This communication will foster a common understanding of the plan and provide opportunities to align various interests in a way that promotes the plan’s chances of successful implementation	The UCUT has already begun the coordination process with the entities that may be interested or could be affected by reintroduction activities. We agree with the Department that such a coordination effort will increase the program’s chance of success. We will work with Federal partners through the UCBAAFWG process to identify appropriate groups for outreach. The UCUT organization and member tribes remain committed to timely and transparent information sharing throughout the duration of Phase 2.
US Dept of Interior	2	We appreciate the plan’s effort to design Phase 2 such that its implementation would not affect current or future system operations. There is uncertainty associated with future dam and reservoir operations in the Upper Columbia, however, due to other regional processes, litigation on the Columbia River System, and climate change. Such operational changes could necessitate altering the approach of some steps in the P2IP. Therefore, it would be helpful to consider whether the plan can function only under current operations, or if it can practicably be adapted to a range of possible future operations.	The plan has developed a robust adaptive management plan to address and incorporate new information (e.g., change in dam operations) as it becomes available. However, the plan has a stated goal of not significantly affecting flood control, irrigation, power production and other major dam operations now or into the future. Thus, if these operations are altered the plan, by design, will adapt and continue to function.
US Dept of Interior	3	The level of involvement by our agencies will depend on specific activities affecting federal lands or facilities and their associated purposes. Federal involvement could also include regulatory compliance requirements that may affect timelines, scope, and budget for some Phase 2 actions. Our agencies will work through	We would greatly appreciate your participation in implementing the plan. We will need the Department’s expertise in dam operations and fish passage development to implement the activities identified in the P2IP and achieve our goals.

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		the UC BAAF working group to determine whether and how our involvement is needed as the details of implementation develop.	
US Dept of Interior	4	In addition to the technical, biological, and logistical components of the P2IP, a plan for securing regional and national support would help this effort move forward successfully. Our agencies would hope to be engaged in policy discussions concerning the implications of any proposals on our respective missions as part of such conversations.	The UCUT value your participation in the plan and will coordinate with you on all pertinent topics and especially those related to your missions.
NOAA	5	During Phase 2 step 1 (years 1–6) NOAA supports the use of unlisted Chinook salmon and sockeye salmon for reservoir behavior and dam passage studies. However, we welcome further discussion and evaluation of spring-run Chinook salmon and/or steelhead in the blocked area. Expanding these stocks into the blocked areas could improve spatial diversity and abundance metrics and improve the resilience of these species in the Upper Columbia.	<p>We are not looking to use ESA-listed fish for reintroduction efforts, particularly in the studies for Phase 2 so that we can avoid the regulatory burden of ESA, to be responsive to concerns of stakeholders in the blocked area, and to focus our work on healthy and productive stocks that are most likely to be successful. The overall goal of reintroduction is to have healthy and harvestable salmon populations above Grand Coulee Dam and we think the best way to achieve that is by using non-ESA listed stocks. However, UCUT tribes also have a strong conservation ethic and recovering weak stocks to healthy and harvestable levels is consistent with our long-term goals. We look forward to discussing this further with you.</p> <p>In the current plan, we conclude that ESA policy constraints must be resolved prior to using listed spring Chinook or steelhead for reintroduction and testing. Because we have yet to quantify fish passage feasibility and fish survival through dams</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
			<p>and reservoirs, we are of the opinion that unlisted stocks should be used to gather needed information.</p> <p>The use of Upper Columbia River steelhead was explored in the Phase 2 Report (pg. 38). Because of disease and genetic concerns, steelhead from extant stocks were not selected for reintroduction. However, one notable exception was proposed.</p> <p>The Phase 2 Report states: <i>Redband trout (O. mykiss gairdneri) from the blocked area have been documented in the anadromous zone and evidence exists that a portion of the resident populations are expressing anadromous life history (McLellan et al. 2021).</i></p> <p>The plan calls for identifying, using genetic or marks, any steelhead/Redband trout juveniles captured at interim collection facilities and then transporting them downstream to below Chief Joseph Dam (with approval of regulatory agencies). Returning adults would then be transported and released upstream of the dam(s).</p> <p>Therefore, the plan does call for a limited effort to return blocked area origin <i>O. mykiss</i> to the blocked area, if it can be achieved while addressing ESA constraints in the blocked area.</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
NOAA	6	<p>Juvenile studies in the Phase 2 document primarily use yearlings, but we suggest you consider including releases of subyearlings.</p>	<p>The Plan does call for using subyearling hatchery Sockeye.</p> <p>Subyearling Chinook present a unique challenge because it is not possible to collect and tag an unbiased sample of the population due to their small size and protracted emigration and many of the emigrants then rear in the reservoir, rather than actively migrating. Likewise, hatchery subyearlings are much larger than natural origin migrants and may not provide a valid surrogate for natural-origin migrants.</p> <p>Despite these challenges, we have added some studies of subyearling Chinook to this version of the P2IP because we agree that it would be helpful to understand survival and behavior of subyearling Chinook, as this is the major juvenile life history of summer Chinook in extant areas. However, because of the difficulty in separating subyearling rearing mortality from migration mortality (Gingerich and Kahler 2020), the primary purpose of the subyearling releases will be to evaluate fish behavior and survival at the dams.</p> <p>Details can now be found in Section 2.5.1.1.</p>
NOAA	7	<p>Similarly, understanding the growth, development, and outmigration timing of juvenile Chinook salmon in the tributaries would provide more information on subyearling growth and migratory behavior. Juvenile</p>	<p>We do not believe this information is required for determining the possible success of the reintroduction effort if we are able to get adult to adult recruitment per our proposal for using PBT to estimate adult R/S. Also, much of the summer</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		<p>sampling could be accomplished using screw trapping or other methods downstream of adult spawning areas or remote site incubators.</p>	<p>Chinook production may come from areas that are not conducive to capturing juvenile outmigrants (large river / reservoir production) and was therefore not prioritized for collection in the first edition of the P2IP.</p> <p>While juvenile migration timing from tributaries is interesting and will be informative at the local tributary level, it is the migration timing at the juvenile passage systems that is of most interest for this program. We expect that some Chinook will rear in the reservoirs and migrate as yearlings.</p> <p>However, there are existing juvenile salmonid trapping (rotary screw traps) efforts underway in two of the important tributaries (Sanpoil R. and Tshimikain Ck). The STI and CCT expect these efforts to continue throughout Phase 2 and we will use the information from these efforts to document information about anadromous species.</p> <p>We failed to mention this in the first draft of the P2IP and will add it to the next version. As part of the adaptive management approach, we will consider adding additional juvenile trapping projects in more tributaries (or beach seining in recruitment areas of the reservoirs) if it is determined that the information is needed to support the feasibility evaluation.</p>
NOAA	8	<p>...consideration of the use of Upper Columbia River <i>Oncorhynchus mykiss</i> should be explored.</p>	<p>See response to NOAA comment #5</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
NOAA	9	<p>...genetic comparisons between anadromous steelhead populations below Chief Joseph dam and <i>O. mykiss</i> above natural and manmade barriers could identify any residualized steelhead populations that have persisted above the mainstem dams. These populations can contribute to anadromous populations when passage occurs.</p>	<p>We agree with this comment.</p> <p>The P2IP states: <i>Redband trout (O. mykiss gairdneri) from the blocked area have been documented in the anadromous zone and evidence exists that a portion of the resident populations are expressing an anadromous life history (McLellan et al. 2021).</i></p> <p>The plan calls for identifying (using genetics or marks) any steelhead (or Redband) juveniles captured at interim collection facilities and then transporting them downstream to below Chief Joseph Dam (Section 2.9). Returning adults would then be transported and released upstream of the dam(s). As noted in the comment, returning adults may potentially contribute to anadromous populations.</p> <p>Additionally, UCUT is interested in working with NOAA on further investigations on how blocked area origin <i>O. mykiss</i> are contributing or could contribute to extant populations of steelhead.</p>
NOAA	10	<p>Routine project operations often route flows through penstocks or regulating outlets. These passage routes are deeper in the water column and can be more difficult to find by juvenile salmon than surface passage routes. It would be useful to have more detailed descriptions of the current structures and operations of dams in the mainstem and tributaries. These descriptions should include the elevations of</p>	<p>The information identified in the comment will be collected and organized as part of the three phased fish passage design study outlined in the plan (Section 3, pg 49). The report will be edited to make it clear that such data will be collected.</p> <p>Additionally, the Phase 1 Plan (Fish Passage and Reintroduction Phase 1 Report: Investigations Upstream of Chief Joseph and Grand Coulee</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		penstocks, regulating outlets, and spill bays, and routine project operations and special operations, including flood risk management rule curves. The range of expected reservoir elevations during different water years will inform the types of collection systems or operational passage plans that could be employed.	Dams) provided substantial information on dam operations, flows, penstock depth, etc. for each project. This information was used to conclude that it was possible to develop safe, timely and effective fish passage at Chief Joseph, Grand Coulee and Spokane River dams.
NOAA	11	NOAA is currently participating in the Upper Columbia Blocked Area Anadromous Fish working group where the UCUT are coordinating this and other issues with the Federal agencies. As specific issues regarding regulatory authorizations and expanding existing hatchery production and facilities emerge, we stand ready to assist the UCUT in engaging with other hatchery programs and fishery co-managers in the basin to address these important issues.	We appreciate your support and will continue coordinating activities and needs as the P2IP is implemented.
NOAA	12	The type, distribution, and amount of habitat above the dams will be integral to the success of reintroduced salmon. One important set of environmental factors to consider is the hydrologic and stream temperature regime of tributaries above the dams. The timing and magnitude of peak and low flows, as well as the suitability of stream temperatures to the various life stages of Chinook salmon, are important to consider in relation to the success of reintroduced fish. Quantifying the proportion of time each of the tributaries is suitable for Chinook salmon migration, spawning,	<p>The plan currently relies on habitat analyses in many of the tributary habitats using the Ecosystem Diagnosis and Treatment Model (EDT). The methods, input data etc. for the EDT analysis is described in the following reports:</p> <p>ICF 2017. Anadromous Reintroduction Potential for The Sanpoil River and Select Upper Columbia Tributaries on The Colville Reservation Using the Ecosystem Diagnosis and Treatment Model.</p> <p>ICF 2018. Anadromous Reintroduction Potential for the Spokane Basin and Select Tributaries to</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		<p>incubation, emergence, optimal growth, and outmigration would help us better understand how tributary habitats will support summer, fall, or spring Chinook salmon. This effort could be accomplished initially through a literature review, but we recommend eventually completing quantitative studies, with existing information or through field-based studies.</p>	<p>Lake Roosevelt Using the Ecosystem Diagnosis and Treatment Model. Project # 2016-003-00.</p> <p>Habitat inputs for the Sanpoil River and other Lake Roosevelt tributaries were based on empirical habitat surveys conducted by the tribes. Data on stream flow (min, average, peak), stream temperature etc. were also incorporated where data exists.</p> <p>The habitat data set for the Spokane River is less robust than the Sanpoil River and may need to be improved with additional data collection if initial fish passage studies show relatively high survival. High survival would indicate that monies spent on habitat improvement may increase the likelihood of program success.</p> <p>The proportion of the time the habitat provides suitable conditions for fish is expressed by the percent of the life history trajectories modeled in EDT that were successful. Based on current knowledge, the data indicate that initial efforts and research needs to address the critical uncertainty of fish passage survival. The need for additional habitat analyses will be considered later in the process.</p>
NOAA	13	<p>Based on our experiences with reintroduction in other river basins, we have found it important to assess habitat threats and limiting factors that may decrease survival rates for rearing and emigrating juveniles in blocked area tributary</p>	<p>Although the results were not presented in the Phase 2 Implementation Plan, we have habitat surveys and associated EDT results that describe the limiting habitat factors by life stage for Chinook and steelhead. The tribes do have habitat</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		habitats. We would be interested in learning more about how these factors have been considered, e.g., the number and potential effects of unscreened diversions and intakes in reintroduction areas.	restoration programs in the blocked area to benefit resident fish. Actions taken to benefit resident fish will also benefit salmon during the reintroduction testing in Phase 2. If a decision is made to move forward with reintroduction in Phase 3, the habitat data will be updated for use in selecting habitat improvement actions that would be most beneficial for salmon.
NOAA	14	We acknowledge the importance of communicating and coordinating reintroduction efforts with existing forums that address issues such as broodstock selection and harvest (U.S. v Oregon, Pacific Salmon Treaty), Columbia River System management (Technical Management Team, Fish Passage Operations and Maintenance), blocked areas goals (Columbia Basin Partnership), Columbia River Treaty project operations, and reintroduction efforts within Canada. NOAA stands by to assist in such coordination efforts as identified by the UCUT.	We appreciate NOAA’s commitment to assist in the implementation of the plan.
USFWS	15	<p>The P2IP outlines nine Implementation Strategy Principles. While we defer to the UCUT on what principles are contained in the P2IP, the Service does highlight two concerns that—even if not listed as principles—should be considered as you finalize and implement the P2IP:</p> <ul style="list-style-type: none"> o Coordination should occur to avoid negative impacts to existing hatchery production or goals outlined in other basin-wide or local agreements (e.g., <i>US v Oregon</i>). 	<p>The possible sources of hatchery fish for the program and possible effects to other hatchery programs are described starting in section 5.1.1 of the plan. The program will consider four possible sources of hatchery fish:</p> <ol style="list-style-type: none"> 1. Use of fish from existing hatchery programs 2. Within the +10% of existing program production 3. Surplus fish from existing programs 4. New production

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		<p>o Studies and actions to meet program goals should be implemented in a manner that minimizes impacts to ESA listed species and critical habitat.</p>	<p>The use of any of the four sources will require consultation with the regulatory agencies before implementation. Possible effects the four options may have on processes such as <i>US v Oregon</i> would be evaluated at that time.</p>
USFWS	16	<p>When assessing passage options and design of upstream fish passage at any of the dams within the range of bull trout (i.e., Chief Joseph, Grand Coulee and to some extent, Spokane River Dams), we urge consideration of passage and recovery needs for bull trout by all the relevant parties. We also ask that the Service be included in development of design and implementation of any upstream passage facilities or solutions.</p>	<p>The Service will be invited to participate as a member of the fish passage team. It is in this forum that the needs of bull trout will be considered in the design, construction, operation and evaluation of each passage facility.</p> <p>We welcome the USFWS expertise on Bull Trout recovery and management and are willing to incorporate your recommendations on Bull Trout passage at the temporary facilities.</p>
USFWS	17	<p>Non-Native and invasive species are a significant concern. The Service views several non-native and invasive aquatic species as relevant to the studies and actions proposed in the P2IP, including but not limited to: Northern Pike, Smallmouth Bass, Walleye, Zebra and Quagga mussels, New Zealand mudsnails, and Rusty crayfish. Preventing the spread of non-native and invasive species as a component of evaluating potential fish passage solutions, as well as mitigating the risk of introducing non-target species during salmon reintroduction efforts (e.g., Trap and Haul) should be considered. The Service recognizes, supports, and helps fund ongoing early detection monitoring for aquatic invasive species in the region. The Service supports efforts to monitor</p>	<p>UCUT tribes view downstream collection systems having the ancillary benefit of being an opportunity to intercept non-native and invasive fish species to prevent expansion of their range and to further manage populations.</p> <p>Non-native and invasive invertebrates and plants are currently being monitored for and managed by UCUT tribes as well as other agencies and organizations. Early detection systems and rapid response protocols have been developed and will be implemented by multi-agency coordination groups such as the Washington Invasive Species Council.</p> <p>The Tribes view the control and management of non-native and invasive species as tremendously</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		<p>and control Northern Pike in the blocked areas, as well as downstream of Chief Joseph Dam. We urge all of the concerned parties to continue to support these important efforts. Early detection monitoring for non-native and invasive aquatic species at facilities (both interim and permanent sites) should be considered as a component of the P2IP, along with implementing best management practices and risk mitigation like Hazard Analysis Critical Control Point (HACCP) planning to prevent the unintentional introduction of non-target species.</p>	<p>important and have programs dedicated to this issue.</p>
USFWS	18	<p>Access to hatchery produced juvenile fish is a key underpinning of the entirety of the P2IP, however the document lacks a detailed description of existing hatchery facilities that may be available to help serve this purpose. Given the importance of this aspect of the plan to facilitating the initial studies evaluating juvenile survival and migratory behavior, a fuller discussion of this topic is needed either within the P2IP or as part of a separate evaluation that can be directly referenced in the document. We support a detailed and thorough investigation of the availability of existing hatchery resources (within existing Federal, State or Tribal facilities) as well as future plans to develop dedicated hatchery space and facilities to support this effort. In the near term any inability to rear Chinook Salmon and Sockeye juveniles needed for the initial studies will likely lead to a delay to the implementation of the P2IP as a whole</p>	<p>We are of the opinion that the approach outlined in the plan cover the concerns of the Service (see section 2.11.2). We intentionally avoided naming specific hatcheries and programs because that would require extensive planning and outreach that would have been out of context without the rest of the information in the P2IP defining the need. Now that we have the P2IP, we are working with the USFWS and others on the specifics of how to access and raise the juveniles to meet the needs of the P2IP. As you suggested, the details will be captured in a separate document/process.</p> <p>Over the near term, the approach for artificial production in Phase 2 is to rely on local existing land-based facilities, increased net pen infrastructure and develop acclimation facilities to culture Chinook and Sockeye needed for the reintroduction effort. The use of existing facilities is the lowest cost approach for achieving hatchery</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
			<p>production needs. We have already implemented the steps required to raise needed fish this year. More information on hatchery facilities operated by federal, state or tribes could be required in late Phase 2 or early Phase 3 but believe most of this information is already summarized in existing Hatchery Genetic Management Plans or other operational documents.</p>
USFWS	19	<p>The Chief Joseph Hatchery Adult ladder is proposed within the P2IP as a possible means to support collection of returning adult Chinook salmon for Trap and Haul Programs below Chief Joseph Dam. Improvements to this facility may be needed to improve fish handling and holding conditions if this location were to be utilized. The document references this concern (pg 40 sec 2.11.1) however a detailed evaluation of the Chief Joseph Hatchery adult trapping, holding and spawning facilities as whole may be warranted and could be proposed as a component of the implementation plan. Such a study could benefit both the proposed P2IP efforts and the existing and ongoing Chief Joseph Hatchery production programs.</p>	<p>We agree with this comment. Because the Chief Joseph Hatchery ladder may be used to achieve fish passage objectives, any alterations and/or improvements will be addressed by the fish passage Team as part of their work in Phase 2.</p>
WDFW	20	<p>Timeframe adaptability. The P2IP sets forth a logical, multi-step approach to iteratively move towards establishing the infrastructure and information needed to support reintroduction goals. The entire approach is identified as a 21-year process. We understand the data collected in earlier steps of Phase 2 will be used to inform later steps, and that an adaptive management</p>	<p>The UCUT will be continuously looking for funding opportunities to accelerate studies and the implementation of interim fish passage structures and hatchery facilities, when appropriate. We are also participants in many regional forums and our policy staff track, and help shape, federal and state fisheries legislation.</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		<p>process will be utilized to maintain flexibility in your program. We suggest that as you adaptively manage this process, you also consider whether emerging strategic political or funding opportunities might decrease the amount of time needed to complete Phase 2. Perhaps aim for a faster timeline with check-ins to slow down if necessary.</p>	<p>However, to some degree, the time required to implement the plan is restricted by the life history of the species being tested. For example, Chinook express a 5-year life history. This means that sufficient data for decision-making will take at least 10-years to compile and analyze. To observe a range of typical ocean conditions, and their effect on program success, could take 20-years.</p>
WDFW	21	<p>Climate change. In its review of Phase One, the Independent Scientific Advisory Board (ISAB) noted that climate change would require additional treatment in the P2IP document. While reintroduction of anadromous fish above the blocked area is likely to be a critical climate resilience action for Columbia Basin salmon, we also agree with the ISAB that the P2IP document should account for uncertainties and challenges relative to climate change, as well as documenting how reintroduction can provide climate resilience through providing access to higher elevation, colder water habitat.</p>	<p>The ISAB suggested that both positive and negative effects climate change may have on reintroduction efforts upstream of Chief Joseph and Grand Coulee dams be addressed. They suggested the topic be covered in more detail in future planning and implementation efforts. We agree with the ISAB and will consider climate change impacts and adapt with them. As climate change effects in the blocked upper Columbia are better known, we will incorporate that information into our life cycle model and adjust management plans, as needed. More detailed discussion of climate change uncertainties will likely occur when Phase 2 analyses are synthesized and used for Phase 3 decision making.</p> <p>We envision covering climate change in the evaluation factors listed in section 2.12. Specifically, climate change will be covered under the following factor:</p> <ul style="list-style-type: none"> • {Reintroduction} Effects on extant salmonid populations, including ESA-listed salmonid populations downstream of Chief Joseph Dam.

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
			<p>The next version of the plan will make this assumption explicit.</p> <p>We appreciate WDFW’s recognition of our habitats being a critical climate resiliency tool for Columbia Basin Salmon. Adding these blocked area habitats to the State’s databases (e.g., SaSI) would be beneficial to our reintroduction efforts by further acknowledging the contributions our region can make to salmon recovery and provide more equitable eligibility to receive funding supporting this work.</p>
WDFW	22	<p>Regulatory uncertainties. Section 2.3.2 describes a “stepwise” approach to Phase 2 and vaguely references the federal, state, and tribal regulatory challenges that may be present within the steps. It would be helpful to better understand where regulatory challenges are anticipated (i.e., utilization of federal facilities for acoustic telemetry equipment, interim collection, etc.) and what processes and action alternatives will be considered to resolve these challenges. Several near-term policy and legal venues concerning future Columbia Basin fish and wildlife management could be avenues to reduce regulatory, policy, and political uncertainties – this is another reason to accelerate the process for addressing policy and technical needs to the extent possible.</p>	<p>Section 2.3.2 was not intended to adequately address the regulatory considerations and we edited 2.3.2 to direct readers to more details in section 5.</p> <p>Section 5 provides further considerations of regulatory and policy considerations. We did not go so far as to propose pathways to resolve the challenges but outlined many of the considerations and a policy team framework for addressing them. In some cases, the pathway is clear and simple (apply for a transport permit from WDFW), in other cases (NEPA, ESA consultation) the pathway is not clear and the authors of the P2IP are not currently in a position to outline exactly what happens next. Our current challenge is to understand what processes need addressed and then consult with the appropriate entity to define the path forward, which will happen as we move through Phase 2.</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
WDFW	23	<p>Pathogen testing. There is limited mention in the P2IP of pathogen testing for juvenile or adult fish passed above Chief Joseph and Grand Coulee Dams. The same pathogen risks that exist with transferring fish for cultural releases remains for these potentially larger transfers of fish. Given that the P2IP is the second of a three-phase process and is still largely feasibility and testing, it would seem too early and inappropriate to knowingly move unwanted pathogens into the blocked area without testing for potential pathogens and making sound judgement on whether the risk of moving those pathogens into the blocked area during Phase Two implementation is appropriate. As we have previously discussed with our UCUT partners, it will be very important to manage and reduce risk to the existing resident fish community and their exposure to pathogens to which they are naïve. The risk associated with having a major population scale impact on native redband trout is a concern to WDFW and we believe to the comanagers on Lake Roosevelt as well. WDFW encourages UCUT to engage in a pathogen testing and risk assessment work group to develop a plan moving forward to get ahead of this issue and ensure it does not become a barrier to reintroduction or successful collaboration.</p>	<p>We agree the previous version did not adequately discuss the pathogen risk and pathogen testing topic. Although we do not believe the risks of transmission and the range of population responses in the wild are well understood, we agree that a cautious approach is warranted, particularly in the early years of Phase 2 when it's reasonable to implement with the relatively small number of fish that are being moved. However, as numbers increase through time the benefits of the reintroduction will increase and so will the cost and feasibility constraints of the pathogen testing protocol. We added a section (2.11.2) to explicitly recognize the pathogen sampling protocol that UCUT and WDFW developed and have been implementing since 2019.</p> <p>The UCUT will be happy to engage in the pathogen testing and risk assessment workgroup to develop a more detailed plan.</p>
WDFW	24	<p>Harvest. Per the <i>United States v. Oregon</i> Management Agreement, the harvest sharing framework is abundance-based and intended to</p>	<p>We recognize that a successful reintroduction program may lead to increased harvest rates on Chinook and sockeye populations below Chief</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		<p>meet the escapement goal of 20,000 fish past Priest Rapids Dam. As production and returns increase from reintroduction or other means, the increased run size may trigger the utilization of a treaty/non-treaty harvest rate under the management agreement that could result in a higher proportion of the run being caught; however, the expected harvest is shared approximately 50/50 under most run size scenarios. Non-treaty fisheries have a mixture of mark-selective and non-MSF, while the other 50% is non-MSF.</p>	<p>Joseph Dam. However, we see that as a benefit of the program. Higher harvest rates downstream could affect the success of the reintroduction effort. However, substantial number of adult returns from the reintroduction effort will not occur for many years. The habitat assessments and life-cycle modeling suggest that the translocation of surplus hatchery fish into the blocked area will result in the production of natural-origin offspring, which will partially offset the effects of higher harvest rates. It will be up to the fisheries managers to determine how fisheries and harvest rates may be impacted by increased production from the blocked area.</p>
WDFW	25	<p>Page 4 P2IP Depending on the source of the Chinook, it will have an impact on run timing, ocean migratory habits, and which fisheries they are subject to (i.e., upper Col summer vs URB).</p>	<p>Agreed.</p>
WDFW	26	<p>Page 8-9 This depends on if we are talking about upper Columbia summer or URB for harvest rates. I am assuming the reference to greater than 55% is based on summer Chinook, and We cannot confirm that given there had been errors in the estimate of impacts being accounted for in FRAM. But based on the updated FRAM runs for 2008-2018, there appears to be a similar exploitation rate for summers (57%) and the current and corrected FRAM model estimates that the total (ocean, in-river treaty, in-river</p>	<p>Correct. The harvest rate was based on summer/fall Chinook.</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
		non-treaty) exploitation rate is ~57% for upper Col summer and ~51% for URB.	
WDFW	27	<p>Page 13</p> <p>It would be helpful to have a marking and tagging section inserted prior to Phase 2 Studies (2.5) detailing the marking/tagging strategies for the different studies. Additionally, for proposed larger juvenile releases (in particular Chinook) external mass marking (mark or not mark) needs to be addressed. This info does appear through the various sections of the document, but it would be helpful to summarize it one section.</p>	<p>A final marking strategy will be developed as part of Phase 2 activities. The strategy will need to be agreed to by the management agencies. Possible marking techniques that could be used in the plan are discussed in section 5.1.5.</p> <p>However, the number of hatchery fish released to meet the feasibility tests of Phase 2 will be very small compared to the downstream programs. We are of the opinion that current document structure regarding marking is sufficient, and that further refinement of the tag/mark plan should be handled separately as part of Phase 2 implementation.</p>
WDFW	28	<p>Page 75</p> <p>This document does not address adequately communicating/coordinating with the HC/HSC and receiving approval and/or engaging in appropriate process to receive surplus juvenile/adult salmon (in particular, Chinook, and even production from the ONA Sockeye Hatchery). UCUT should coordinate with a WDFW representative for all requests and those requests should be identified at the beginning of the year. There is a lot of demand for UCR summer Chinook by other parties that must be balanced with reintroduction efforts.</p>	<p>We are aware that access to surplus hatchery fish is an ongoing annual process for both Mid-C and federal facilities and each entity has an associated process for sharing amongst the various tribes. We do not believe that the P2IP is the right place to capture all the details of accessing available surplus fish, however, we have reviewed and modified the language on page 75 to partially address WDFW's concerns via this comment.</p> <p>It has been unclear what the appropriate mechanism is to interact with downstream groups such as the HC/HSC because only 1 of the UCUT tribes are a formal party to those processes. Being included in those discussions or invited to present</p>

UCUT responses to comments received for the August 9, 2021 version of the Phase 2 Implementation Plan.

Organization	Comment #	Comment	Response
			would help improve communications between all managers involved.
WDFW	29	<p>Page 75</p> <p>For the larger juvenile releases into the blocked area (and probably all), UCUT should address drafting HGMPs for NOAA approval.</p>	Once the sources of Chinook and sockeye for testing/reintroduction have been determined, the UCUT will work with NOAA to determine their requirements for new or amended HGMPs.
WDFW	30	<p>Page 79</p> <p>Other approvals that should be addressed (whether needed or not needed) are SCPs (collection of NO adults/juveniles from State waters), Fish Transport Permits on non-reservation lands, and whatever permits are required for potentially transporting fish to and from Canada.</p>	A summary list of needed permits and processes to interact with is now included in Section 5. We request that WDFW assist tribal staff by seeking solutions to alleviate administrative burdens as much as possible. For example, consider issuing multi-year permits and contracts for related work.
WDFW	31	<p>MSF fisheries are not present in the ocean fisheries, where a large proportion of the harvest occurs. Most of the harvest in-river occurs by treaty fisheries, and they are not MSF. The most meaningful MSF fishery would be the upper Columbia summer fishery; however, they are largely focused around terminal areas (yet could catch some of these fish in the Brewster Pool if they decide to 'stage'). Not ad-clipping in order to increase returns would not likely have a significant impact on returns expected to occur (so this marking strategy to distinguish fish can occur if it is the easiest option to utilize by staff identifying fish).</p>	Agreed. We will work with the regulatory agencies to determine the best marking strategy for each species.