



The Confederated Tribes of the Colville Reservation
P.O. Box 150, Nespelem, WA 99155

(509) 634-2200
FAX: (509) 634-4116



Thursday, September 29, 2022

Ms. Susan Poulosom, Section Manager
NPDES Permitting Section, 19-C04
EPA Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101
Submitted via email: Poulosom.susan@epa.gov

Subject: Confederated Tribes of the Colville Reservation Clean Water Act Section 401
Certification for the NPDES Permit for Chief Joseph Dam, NPDES Permit No. WA0026891 and
Grand Coulee Dam, NPDES Permit No. WA0026867

Dear Ms. Poulosom:

In response to the EPA's letter dated January 13, 2022 and pursuant to Section 401 of the Clean Water Act (CWA), the Confederated Tribes of the Colville Reservation (CTCR) hereby certifies that the proposed issuance of the National Pollutant Discharge Elimination System (NPDES) Permit for Chief Joseph Dam (Permit No. WA0026891) and Grand Coulee Dam (Permit No. WA 0026867) will comply with the applicable Sections 301, 302, 306, and 307 of the Clean Water Act and Title 4 of the CTCR Law & Order Code, as amended, provided that the conditions described in the attached documents are implemented. This certification is valid for the term of the reissued permit subject to the conditions identified in the attached Analysis of the Clean Water Act Section 401 Certifications for the NPDES Permits for Chief Joseph and Grand Coulee Dams.

CTCR was authorized Treatment-as-a-State (TAS) in accordance with Section 518(e) of the CWA on May 2, 2018 by the U.S. Environmental Protection Agency (EPA) for administering Water Quality Standards under CWA Section 303(c) and certifying that discharges comply with those Water Quality Standards under CWA Section 401. *See U.S. EPA, Approval of the CTCR for Treatment in the Same Manner as a State for Sections 303(c) and 401 of the Clean Water Act (May 2, 2018), available at <https://www.epa.gov/sites/production/files/2018-05/documents/wqs-tribal-colville-tas-decision-document-cover-letter-may-2017.pdf>.* The attached CWA Section 401 certifications identify our conditions for effluent limitations, total dissolved gases, water temperature, monitoring and reporting requirements, and other conditions on the issuance of the NPDES permits for Chief Joseph and Grand Coulee Dams.

The Confederated Tribes of the Colville Reservation (Colville Tribe) is made up of twelve distinct and unique tribes which come from as far south as northcentral Oregon State and far north into British Columbia, Canada. Of these tribes three language groups are identified. The nsəlxcin speaking tribes: snśáyck'st (Lakes), sx^wiy?iłp (Colville), sənpś^wilx (San Poil), nspilm (Nespelem), ukanaqín (Okanogan), and mətx^wu (Methow). The nxa?amxcín speaking tribes: ščəlámx (Chelan), šnpəšq^wáw'šəx^w (Wenatchi), šnt'iyátk^wəx^w (Entiat), and škwáxc'ənx^w

(Columbia). The titoqatímt speaking tribes: walwáma (Nez Perce) and palūspam (Palus). Each of these tribes has their own unique legal and political histories. The original homelands of the twelve constituent tribes cross multiple state borders and the international border of Canada. Our ancestral lands incorporated approximately thirty-nine million acres in Central Washington and Southern British Columbia. Our ancestors made their living off the land, following the seasons and the resources. The Colville Reservation was created by a presidential executive order. The Nez Perce signed the Nez Perce Treaty. The Wenatchi and Palus signed the Treaty of 1855. The Columbia signed the Moses Agreement, which also created the Moses-Columbia Reservation. To each of our tribes, water is sacred.

Prior to each meal at many of our ceremonies our people will drink a small glass of water. One of the songs that our people will sing before our ceremonial dinners at our longhouses includes the phrase: “Water cleanses the souls/lives of everything living”. This song has been handed down from one generation to another and there is no way of knowing how old this song is.

At our Winter Dances, our people will pray with a Sweat bath prior to sending someone out to gather water from one of our streams to serve to everyone in attendance. These dances are both spiritual and religious as our people come together during the winter months to pray for our people and natural world. It is important for our people to follow the handed down teachings of our Elders and provide water, salmon, deer meat, bitter roots and camas at these traditional events throughout the year. These are four food chiefs.

Each year tribes on the Colville Reservation celebrate the return of salmon with a “Salmon Feast”. All of our tribes will also celebrate the return of each of our food groups with a “Root Feast” and a “Berry Feast”. Salmon has always been integral to our family and community gatherings and ceremonies. Our people still trade, share and give salmon and other traditional foods with each other and with members of other tribes. The importance of giving and sharing is central to our cultural identity. Traditional meals which include water is served at our first food feasts, pow-wows, naming’s, funerals, winter dances, longhouse ceremonies, weddings, and other social gatherings.

One of the greatest injustices that the tribes on the Colville Reservation faced was the loss of salmon because of the construction of Chief Joseph and Grand Coulee Dams. Salmon have been blocked from the Upper Columbia for approximately 80 years now. The last salmon run was celebrated with a “Ceremony of Tears” by thousands of Native people from all throughout the Pacific Northwest. Our Ancestors and Tribal Leaders have worked diligently to have salmon reintroduced back to their ancestral homelands above Grand Coulee Dam. This has been one of the CTCR’s most important objectives when participating in meetings for the Columbia River Treaty, the Columbia River System Operations Environmental Impact Statement, the CTCR’s Columbia River Fish Accord and in countless meetings with Federal and State Agencies and Forums. Although anadromous fish reintroduction above Grand Coulee Dam is not identified as a 401 certification condition, it is one of the most important issues to the Tribes on the Colville Reservation and needs to be acknowledged.

For further coordination on this proposed issuance of this permit, please contact CTCR Watershed Program Manager -Douglas Marconi Jr (509-634-2428, douglas.marconi@colvilletribes.com).

Sincerely,

DocuSigned by:

Cindy Marchand

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For

Jarred-Michael Erickson, Chairman
Confederated Tribes of the Colville Reservation

Cc

Cody Desautel, Executive Director
Rebecca Hunt, Acting Natural Resource Director
Rodney Cawston, Environmental Trust Program Manager



The Confederated Tribes of the Colville Reservation
P.O. Box 150, Nespelem, WA 99155

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**Confederated Tribes of the Colville Reservation Clean Water Act Section 401 Certification
for the NPDES Permit for Chief Joseph Dam, NPDES Permit No. WA0026891
Analysis**

In response to the EPA's letter dated January 13, 2022 and pursuant to Section 401 of the Clean Water Act (CWA), the Confederated Tribes of the Colville Reservation (CTCR) Natural Resource Division Environmental Trust Program hereby certifies that the proposed issuance of the National Pollutant Discharge Elimination System (NPDES) Permit for Chief Joseph Dam (Permit No. WA0026891) will comply with the applicable provisions of Sections 301, 302, 306, and 307 of the CWA and Title 4 of the CTCR Law & Order Code¹ as amended, provided that the conditions below are implemented. This certification is valid for the term of the reissued permit subject to the following conditions:

General Conditions:

1. Certification: This certification does not exempt and is provisional upon compliance with other applicable statutes and codes administered by federal and CTCR agencies. Pursuant to Colville Tribal Law & Order Code Title 4 Natural Resources and Environment, the facility operator may also require a Waste Discharge permit from either BPA or the Department as applicable as provided in Chapter 4-8 Water Quality Standards² and Chapter 4-10 Water Resources Use and Permitting³ adopted thereunder.
2. Non-Point Sources and Tribal Water Quality Standards⁴: Pursuant to CTCR, each operator of a facility that discharges to CTCR Waters shall be responsible for achieving compliance with the Water Quality Standards for waters of the Colville Reservation.
3. Total Dissolved Gas (TDG)⁵: Except during involuntary spill events, dam operations-including spill to enhance fish passage-should not cause or contribute to exceedance of the applicable total dissolved gas (TDG) water quality criteria or any short-term modification thereto authorized under Washington/CTCR Water Quality Standards. Dam operations must allow the variance of up to 120% TDG during the spring fish passage period which is important for juvenile salmon and steelhead emigration survival.

The Corps/Bureau must conduct field monitoring for gas bubble trauma in fish populations and other forms of vertebrate and invertebrate aquatic life throughout the fish spill season, including when TDG levels exceed the water quality criteria during flood or involuntary spill events. The Corps/Bureau must report the results of such field monitoring to the CTCR. The Corps/Bureau

¹ Colville Tribal Law & Order Code Title 4 Natural Resources and Environment

² Colville Tribal Law & Order Code Chapter 4-8 Water Quality Standards

³ Colville Tribal Law & Order Code Chapter 4-10 Water Resources Use and Permitting

⁴ Colville Tribal Law & Order Code Chapter 4-8-5(d) Non-point Sources and Tribal Water Quality Standards

⁵ Colville Tribal Law & Order Code Chapter 4-8-6(A)(3)(E) Water Quality Criteria

⁵ Colville Tribal Law & Order Code Chapter 4-8-6(b)(3)(C) Dissolved Oxygen-Freshwater

⁶ Colville Tribal Law & Order Code Chapter 4-10-132 Additional Policy Guidelines

must assure meaningful and timely consultation with CTCR to address monitoring frequency, timing and locations.⁵

4. Temperature: When EPA issues a final temperature TMDL for the Columbia River, the load allocations and any implementation plans of that TMDL applicable to the dam and reservoir will become conditions of this Certification.

5. Members of the Confederated Tribes of the Colville Reservation rely heavily on locally caught fish for subsistence and ceremonial uses and have higher consumption rates than the general public. The promulgation of new or amended Water Quality standards or regulations having a direct bearing upon permit conditions or require permit revision, the CTCR may require reopening and modification of the current permit. Other issues that may impact Water Quality Standards for further consideration include:

- Reopening certification due to substantial changes in conditions or operations
- Releasing water stored pursuant to the US-Canada Treaty
- Implementation of the Columbia River System Operation Environmental Impact Statement preferred alternative
- Seasonal reservoir drawdowns⁶
- Columbia River System Operations Biological Opinion(s)
- Increase water flows for recreation

6. Culture: Cultural sites, (archaeological and traditional places) are adversely impacted by various types of non-point “pollution”; caused by CJD, including but not limited to cultural plants, cultural ceremonies, cultural medicines, cultural foods, and, IN PARTICULAR anadromous aquatic species, sustainers of Native American life, traditions, and physical, mental, emotional, and spiritual well-being. Please see Attachment One: “National Point Discharge Elimination System Cultural Resource Assessment.”

Where to Submit Information: All required or requested documents shall be submitted to:

Confederated Tribes of the Colville Reservation
Environmental Trust Department
ATTN: Watershed Program Manager
PO Box 150
Nespelem, WA 99155

Please see the CTCR website (<https://www.colvilletribes.com> and <https://www.cct-cbc.com/current-code/>) to review a copy of the Title 4 Natural Resources and the Environment and the references upon which conditions identified above are based.

¹ Colville Tribal Law & Order Code Title 4 Natural Resources and Environment

² Colville Tribal Law & Order Code Chapter 4-8 Water Quality Standards

³ Colville Tribal Law & Order Code Chapter 4-10 Water Resources Use and Permitting

⁴ Colville Tribal Law & Order Code Chapter 4-8-5(d) Non-point Sources and Tribal Water Quality Standards

⁵ Colville Tribal Law & Order Code Chapter 4-8-6(A)(3)(E) Water Quality Criteria

⁵ Colville Tribal Law & Order Code Chapter 4-8-6(b)(3)(C) Dissolved Oxygen-Freshwater

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Colville Confederated Tribes

MEMORANDUM

HISTORY/ARCHAEOLOGY PROGRAM



Attachment One: National Point Discharge Elimination System Cultural Resource Assessment

Impacts

Cultural resources, tribal culture, and historic properties on the Columbia River have been the focus of tribal concerns with federal agency actions since breaking ground for Bonneville Dam in 1933 and Grand Coulee Dam in 1934. Adverse impacts accelerated and worsened when construction began on Chief Joseph Dam in 1949.

The Upper Columbia River constitutes a cultural landscape since time immemorial. While part of a larger and complex weave of history, sociology, economics and politics, the impacts and outcomes of the dams are often clear and discernable. In essence the dams themselves are a polluting element and will remain so as long as they stand. All operation and maintenance for all authorized purposes are direct impacts of the ongoing operation of the dams. This impact, this pollution, is the primary reason for the loss of Native American culture above Grand Coulee Dam and to a lesser degree above Chief Joseph Dam.

When we speak of a cultural landscape or resource we include cultural sites (archaeological and traditional places), subsistence fauna, cultural plants, ceremonies, medicines, cultural foods, and, in particular, anadromous aquatic species, sustainers of Native American life, traditions, and physical, mental, emotional, and spiritual well-being. Impacts are well documented in various on-line resources linked here:

1. Salmon & Our People: The Chief Joseph Dam Fishery Story
2. The Kettle Falls Fishery
3. Grand Coulee Dam: Tribal Impacts
4. Legends And Landscapes: "Coyote Stories Along the Columbia"
5. The Price We Paid
6. Book Of Legends
7. Heart of The Palus
8. Place Name Document

and in countless other documents.

An entire way of life was polluted, the waters, the air, preventing salmon and lamprey runs, loss of the sturgeon fishery, inundation of the Indian towns breaking up traditional social groupings, the move to a cash economy upset leadership roles, the construction boomtowns around the dams

lead to various vices, an influx of outsiders, the disintegration of ethnic grouping (Indian bands), and the breaking up of families to move to work places to earn money.

The Scope of Impacts

One uniform rule in cultural resource management is scaling cultural studies, investigations, and treatments to the scope of the undertaking and the impacts. Scope means both the nature and the size of the project and nature and the size of the impacts. The scope of Grand Coulee and Chief Joseph dams is enormous and far reaching; they affect the entire Columbia River watershed. Direct impacts are concentrated along the main-stem of the Columbia River. Flow and spill requirements along the Columbia condition water management on the Snake River. There are effects to all tributaries, large and small. The most obvious impacts are in the major storage reservoirs and the Columbia Basin Project; however, there are impacts along the entire system.

Pollution is sometimes obvious and quantifiable, waste from smelters or the toxic bloom in Rufus Woods. Sometimes they are less obvious – housing, businesses, roads, or recreation. Each of these elements bring their own impacts. Transmission resources attract off channel power projects. Impacts are direct, indirect, and cumulative. The size and nature of the Columbia River Treaty undertaking and impacts are so immense it is difficult to quantify impacts.

For the purposes of the Columbia River Treaty, CCT cultural resources include, but are not limited to, those in applicable laws directed toward tangible resources. They also include cultural resources that are not necessarily site-specific such as ritual, ceremony, language, teachings, etc., and they include resources such as the land, water, air, and animals. These resources consist of individual artifacts, sites, natural resources, and ecosystems.

Regulatory Frame Work Identify Polluting Elements

What follows is a summary of various laws that include ‘cultural resources’. Much of the language is directly from the regulations. Tie-ins to these regs concludes paragraphs.

Archaeological Resources Protection Act - The term "archaeological resource" means any material remains of past human life or activities which are of archaeological interest, as determined under uniform regulations promulgated pursuant to this chapter. Such regulations containing such determination shall include, but not be limited to: pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. No item shall be treated as an archaeological resource under these regulations unless such item is at least 100 years of age. The more typical impacts are various types of erosion, agricultural development, and looting

Protection of Historic Properties, 36 CFR 800.16 - Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or

Native Hawaiian organization that meet the National Register criteria. Audio and visual pollution affects qualities of solitude and seclusion necessary to many ceremonies, rites, religious, and spiritual activities.

Native American Graves Protection and Repatriation Act - These regulations apply to human remains, funerary objects, sacred objects, or objects of cultural patrimony. This is the single most important spiritual concern to the Colville Tribes and to tribal members, the continuous erosion or excavation of human remains from banks, canals, ditches and infrastructure. Respectful recovery is often hindered by rising and lowering reservoir elevations, reservoir distribution of pollutants and toxins.

Revised Code of Washington 27.44 – Includes any glyptic or painted records, cairns, graves, and any associated archaeological material from any such cairn or grave. Recreation is the biggest danger to glyptic records, graffiti, removal, and covering them. If you did not have elevational, maintained reservoirs and a National Park unit there wouldn't be digging potties, installing huge plastic slides, building forts, bank carving, and looting exposed sites and artifacts.

Revised Code of Washington 27.53 – All sites, objects, structures, artifacts, implements, and locations of prehistorical or archaeological interest, whether previously recorded or still unrecognized, including, but not limited to, those pertaining to prehistoric and historic American Indian or aboriginal burials, campsites, dwellings, and habitation sites, including rock shelters and caves, their artifacts and implements of culture such as projectile points, arrowheads, skeletal remains, grave goods, basketry, pestles, mauls and grinding stones, knives, scrapers, rock carvings and paintings, and other implements and artifacts of any material that are located in, on, or under the surface of any lands or waters owned by or under the possession, custody, or control of the state of Washington or any county, city, or political subdivision of the state are hereby declared to be archaeological resources. Any object that comprises the physical evidence of an indigenous and subsequent culture including material remains of past human life including monuments, symbols, tools, facilities, and technological by-products or any geographic locality, including but not limited to, submerged and submersible lands and the bed of the sea within the state's jurisdiction, that contains archaeological objects. Artifact diving, especially on old town sites has become quite the rage.

Guidelines for Evaluating and Documenting Traditional Cultural Properties (TCP) – A traditional cultural property is defined as a property eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that are rooted in that community's history, and are important in maintaining the continuing cultural identity of the community. In practice, CTCR TCPs include, but are not limited to: religious areas, sacred areas, resource gathering areas (plant, animal, fish, and mineral), places associated with stories and legends, archaeological and ethnographic sites, habitation sites, campsites, rock images, special use sites, trails, and places with Indian names. Seemingly safe from the standard polluting discussed above, it is actually equally susceptible.

National Environmental Policy Act – NEPA expands cultural resource beyond objects and bounded properties. NEPA states the need to preserve important historic, cultural, and natural

aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice. Under the Scoping clause (1508.25), project components cannot be reviewed independently as unconnected actions. This means irrigation projects, recreation, hydroelectric power, power transmission, off-channel storage, etcetera are not separate from the undertaking. This broader interpretation of cultural resources and the scoping clause combines relate directly to fish and other natural resources and they pave the way for assigning direct, indirect, and cumulative impact designation in a domino effect. Using Grand Coulee Dam as an example – the dam is a pollutant itself, especially during construction and reservoir filling. Erosion of thousands of tons sediment, washing out sites, cemeteries and towns is certainly pollution. Without the dam, there is no town, no reservoir, no roads, no population growth, no recreation, etc.

American Indian Religious Freedom Act, 42 U.S.C. § 1996 – Religious practices of the American Indian are an integral part of their culture, tradition, and heritage – such practices form the basis of Indian identity and value systems. Traditional American Indian religions, as an integral part of Indian life, are indispensable and irreplaceable. It shall be the policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites. Touched on earlier, here impact is from audio and visual pollution.

When added together, tangible cultural resources span the gamut from an isolated fire-cracked rock to entire ecosystems, such as those supporting anadromous fish runs.

How does this Effect Tribal Culture

Language, ceremonies, rituals, traditional teachings, religion, legends, settlement and subsistence patterns, and many other intangible things are a product of and shape the beliefs of a living community and the history of that community. They are essential to maintaining the continuing cultural identity of the tribes. The impact of the loss or diminution of these cultural ways are identifiable and can be documented historically, quantitatively, and qualitatively. However, assigning the cause of the impact is rarely ascribable to a single action, event, entity, or moment. Impacts are cumulative.

We understand there is difficulty documenting the causal relationship between the loss of language, ceremonies, legends, and other non-property based aspects of culture to specific undertakings. We offer the following statement in support of the connection.

Sylvia Peasley (personal communication 2012), formerly of the Colville Business Council, stated “culture” is lost when the Indian language is lost and when spiritual ceremonies are no longer conducted. Sylvia grew up on Keller Butte, above the Sanpoil River. Sylvia’s grandfather and great grandparents lived along the Sanpoil River arm of the Columbia River by the town of Keller. She learned her traditional ways from her grandfather. Her family ritually practiced daily sweat baths. During the ceremony, they spoke in their language, discussed family history, and

told legends. Elders relayed details of the sweat bath ceremony through teaching and through practice. As an adult, Sylvia moved down to Keller. Knowing smelter contamination pollutes the water (which now is the Grand Coulee Dam's Lake Roosevelt Reservoir instead of the Sanpoil River), she is hesitant to continue the ways taught to her. She still sweats intermittently; although she fears heating the rocks, vaporizing the water, and burning fir boughs will release toxins she will inhale or ingest.

All of her traditions are compromised. Indian people are aware of the contamination and they fear it, as they do the toxic blooms of Rufus Woods Lake. Salmon are gone above Chief Joseph Dam and there are health alerts limiting the intake of resident fish in the Grand Coulee Dam reservoir. She sees youth, elders, and other community members overcome with various health issues tied into the river and all that the river encompasses in Indian culture. Youth in Keller are losing their ways, the tainted river and loss of salmon damaged our way of life. Parents do not have the same opportunities to pass down their customs and traditions. Few know all the words to the different ceremonies anymore. No one person still remembers the names of all the fish. No one person remembers all the different names used for some species of fish, as they are called by different names as they move through the stages of their life. Sylvia contends that when sweats are not conducted, the language is not spoken as often, legends not told, family history forgotten, ritual practices lost, and the status and role of the elders change.

The example provided by Sylvia Peasley is the experience of one tribal member; there are over nine thousand other CCT tribal members with similar experiences in their families.

Impact Assessment: In terms of the resources themselves, each pollutant, point and non-point source takes its toll. The land is polluted, overpopulated, and deforested. Air is polluted; the climate is changing. Rain is more acidic. The fish are gone in some reservoirs and severely reduced in the others. Many of the big game animals are extirpated or have been pushed back into the wilderness. Cultural loss is due to many factors, but each factor plays a role and shares a portion of the responsibility for cultural loss. The history of river management and dams is a major contributor to cultural loss. The rivers brought the earliest European explorers and traders. Rivers were the impetus and conduit for early agriculture and hydrologic mining. Early industry focused on salmon harvest. With electric power, industries grew to include aluminum plants and the Hanford Nuclear Reservation. Rivers became pond for refinery waste. Rivers evolved into modern trade corridors, first on a smaller scale and then to service today's agribusiness. Ultimately, the Columbia River system became a power generator and transmission corridor.

In the Pacific Northwest, the Columbia River is directly tied to the central flood control mechanism, it is the largest recreational tourism draw, and it is the largest irrigation system. These projects are inexorably entwined. Any and all tribal cultural losses related to the rivers is continued, reinforced, and maintained by these current and ongoing undertakings, the dams.

Can This All Be Fixed Overnight and What is the Fix?

As noted in the beginning, the overwhelming changes to people and place over the last one hundred years prevent us from turning back the clock. But it does not prevent us from trying to retrieve some of the old way and traditional knowledge. We can also protect what remains.

Detailed analyses will cause more delay, which increases harm to cultural resources. Detailed analyses also require a great expenditure of funds, which could be used to treat and mitigate impacts. To address the impending impacts to cultural resources and tribal culture, we recommend the Colville Tribes work through Water Quality Certification task forces to set priorities, identify fund and move forward to clean up the environment, protect historic properties and restore full lifecycle fish passage. We have Departments and Programs that work with these resources and have concepts outlined, plans in mind and projects ready or nearly ready to being implemented.

Continuation of the existing resident and anadromous fish policies, cultural resource programs, language programs, environmental remediation, and mitigation lands programs will help address impacts to cultural traditions. However, we need assistance building and maintaining capacity to provide support for cultural programs with the tribes in language, native plants, and spiritual traditions. Further recommendations will be provided as the Confederated Tribes of the Colville Reservation work in partnership with agencies and regulators to identify and solve problems through creative mitigations and treatments.