

**WATERSHED MANAGEMENT PROGRAM
DRAFT ENVIRONMENTAL IMPACT STATEMENT:
COMMENTS AND RESPONSES**

The Draft Watershed Management Program EIS was published in February 1997, and circulated for public review. Reviewers were encouraged to write or e-mail comments on the DEIS. The EIS environmental team also held public meetings across the Columbia River watershed to gather comments. Meetings were held in Yakima and Spokane, WA; in Lewiston, Boise, and Salmon, ID; in LaGrande, Redmond, and Portland, OR; and in Kalispell, Missoula, and Libby, MT. The public comment period closed on March 25, 1997. In all, 142 comments were recorded at the meetings; another 110 comments were identified from the 19 letters received.

All identified comments were read and assigned to comment categories for members of the environmental team to review, respond to, and modify the EIS, as necessary. Categories are listed below.

- Purpose and Need/Scope (*pp. 4-7*)
- Process/Coordination (*pp. 7-25*)
 - * Jurisdictional Coordination/Partnerships (*pp. 7-16*)
 - * Watershed Approach (*pp. 16-23*)
 - * Public Involvement/Decisionmaking (*pp. 23-25*)
- Alternatives (*pp. 26-37*)
 - * General (*pp. 26*)
 - * Alternative 6 (*pp. 27-32*)
 - * Other Alternatives (*pp. 32-38*)
- Techniques (*pp. 38-47*)
- Funding/Priorities (*pp. 47-54*)
- Environmental Impacts (*pp. 55-64*)
- The EIS: Structure, Analysis, Results (*pp. 65-70*)
- Miscellaneous (*pp. 70-76*)

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The comments are treated as follows.

- Each comment has been assigned a unique identifying number (e.g., the fourth comment in comment letter six is identified as 06-04; the fourth comment at the Yakima meeting is identified as YK-04). For letters, coding is in boldface and the name of the commenter also appears in italics at the end of each comment.
- Comments are arranged by general subject for greater ease of response.
- Some comments applied to more than one subject. Where a comment is repeated, the location of its "twin" is listed at the end of the comment.
- Any changes to the EIS are noted in the responses.

Meeting Codes

Codes assigned to meetings are as follows:

YK	Yakima	SP	Spokane
LW	Lewiston	KL	Kalispell
LG	LaGrande	MS	Missoula
RD	Redmond	SL	Salmon
PT	Portland	LB	Libby
BS	Boise	TR	Comments from meetings with Shoshone-Bannock, Shoshone-Paiute, and Umatilla tribes

Commenters

<i>01</i>	<i>Found not to be on this project</i>
02	Mark Tipperman
03	Roberta Bates
04	Mike Keppler
05	Sidney N. Clouston, Jr. Clouston Energy Research
06	Steve Wegner
07	John M. Skovlin Donna Skovlin
08	Joseph R. Maroney Fisheries Program Manager, Kalispel Tribe of Indians

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- 09 Herbert A. Pollard II
Regional Supervisor
Idaho Fish and Game, Clearwater Region
- 10 Gordon Stewart,
President
Flathead Wildlife, Inc.
- 11 Steve Kelly and Mike Bader
Friends of the Wild Swan, Inc./Alliance for the Wild Rockies, Inc.
- 12 John Etchart
Chair, Northwest Power Planning Council
- 13 Steve Martin
WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife
- 14 Robert Ament
American Wildlands
- 15 Candace Thomas
Chief, Environmental Analysis Branch
US Army Corps of Engineers
- 16 Barbara J. Ritchie
Department of Ecology
State of Washington
Also includes letters from (1) Cyreis Schmitt, Conservation Services
Division Manager, Habitat Management Program, Washington Department
of Fish and Wildlife; and (2) Patty Lynch, Washington State Department of
Transportation
- 17 Preston A. Sleeper
Acting Regional Environmental Coordinator
U.S. Department of Interior
- 18 Elizabeth Holmes Garr,
Habitat Conservation Program
National Marine Fisheries Service
- 19 Richard B. Parkin
Manager, Geographic Implementation Unit
Environmental Protection Agency

PURPOSE AND NEED/SCOPE

Comment

18-01 The program objectives are not clearly stated. [Commenter quotes section 1.2 Purposes] The Fish and Wildlife Program's aquatic habitat objectives are not described or referenced, and "environmental protection" is a goal rather than a specific objective. Program objectives should be explicitly stated in the draft EIS.

*Elizabeth Holmes Garr
Director, Habitat Conservation Program
National Marine Fisheries Service*

Response: We have now referenced sections 7.6A Habitat Goal and 7.6D Habitat Objectives for the Northwest Power Planning Council's (Council's) 1994 Fish and Wildlife Program in section 1.2 of this FEIS.

As stated in that section, purposes are the goals or objectives on which BPA intends to base its choice among alternatives. In choosing among the alternatives, we will evaluate the degree to which each of the alternatives provides environmental protection.

Comment

12-03 Please include language that clarifies the importance that the EIS is fully consistent with the existing program as well as future versions of the program. It is in the region's and Bonneville's interest not to close doors on what might be done in watersheds in the future. [Comment not intended as a criticism, but meant to ensure good opportunities are not foreclosed.]

*John Etchart
Chairman
Northwest Power Planning Council*

Response: We have added language (third paragraph of Section 1.1) that states, "BPA's proposed approach to the watershed planning process and this EIS is designed to be fully consistent with the Council's Fish and Wildlife Program. The EIS anticipates future refinements to the Council's Fish and Wildlife Program by providing flexibility through a wide array of techniques, and through a planning approach that does not dictate site-specific solutions."

We have attempted to include in this EIS as many watershed management techniques as practicable. We realize that new techniques could be proposed in future revisions to the Fish and Wildlife Program. Any techniques not included in Appendix A of this FEIS could be added in the future through supplemental

analysis, or through a separate NEPA analysis. Please also see response to comments 05-07 and YK-10 on page CR/39.

Comments

LG-12 Does the EIS cover the mainstem as far as watershed work?

Response: Yes, this EIS could cover watershed actions in the mainstem, but does not cover mainstem operations issues, such as drawdowns at the Lower Snake and John Day dams. These issues were addressed in the Columbia River System Operation Review EIS. See section 1.5.2 of the Watershed DEIS.

Comment

SP-11 Do projects need to be directly connected to an area impacted by the dams?

Response: No, most of the projects are located in the tributary watersheds, while most of the dams are located on the mainstem Columbia River. Projects need only be located in the Columbia River Basin to be considered for funding.

Comments

BS-3 Why is wildlife not mentioned in the "need for action?"

08-02 [Regarding EIS statement: "The goal of these projects is to assist recovery effort for anadromous fish in the CRB" Page 1/3 DEIS] This statement needs to reflect that the goal of these projects is to assist recovery of anadromous fish, resident fish and wildlife within the CRB. Within the Council's Program it states that "Good habitat is important for resident fish, just as it is for anadromous fish. The degraded condition of resident fish habitat in the Columbia River Basin often rivals that of anadromous fish. The Council believes comprehensive, cooperative watershed management is essential to making good investments in protecting, mitigating, and enhancing resident fish in the basin."

*Joseph R. Maroney
Fisheries Program Manager,
Kalispel Tribe of Indians*

12-04 Reports by three independent scientific panels [Independent Scientific Group, National Research Council, National Marine Fisheries Service Salmon Recovery Team] have called for ecologically-oriented approaches to restoration of fish and wildlife habitat. The DEIS appears to be fish-oriented, as opposed to using an ecological approach. Throughout the document, it addresses "anadromous fish

(con't)

and resident fish habitat.” Conversely, at page 3/49 it address wildlife as part of the “affected environment.” We recommend that the language in the EIS be modified to clarify that this is an ecologically-oriented approach, not just a species-specific approach.

*John Etchart
Chairman
Northwest Power Planning Council*

Response: While the primary emphasis of the watershed program is to address anadromous and resident fish habitat impacts, we realize the importance of looking for ways to address mitigation from an ecosystem standpoint, not just focusing on fish. That is why we used an ecosystem-based planning process (developed in *The Ecosystem Approach: Healthy Ecosystems and Sustainable Economies*, a report of the Interagency Ecosystem Management Task Force, June 1995) as our model for the eight-step process we are proposing to adopt.

One of the reasons we prefer Alternative 6 is that it does recognize the value of a balanced, ecosystem approach to watershed planning. Many of the mitigation efforts for anadromous or resident fish would go hand-in-hand to also benefit resident fish and wildlife. From a cost standpoint, it also makes sense to fund watershed activities that benefit as many species as possible. See the preferred alternative discussion under section 2.1.7, third paragraph.

We have clarified the first purpose to address the ecosystem approach. Also, we have added fish and wildlife, where appropriate, to the language in Chapter 1.

Comment

YK-15 Watershed restoration projects should be related to and consistent with salmonid management; e.g., Yakama Indian Nation wildlife projects are being planned to provide salmonid mitigation, as well. Watershed projects should address this goal, as well. [Also see **Process and Coordination.**]

Response: The basic goal of watershed plan development and implementation funded by BPA is restoration of salmonid habitat productivity. Alternatives 3, 5, and 6 of the EIS include a prescription under Step 5 (Establish Project Goals) to “Include, as a project goal: . . . development of habitat that complements the activities of the region’s tribes and state and Federal fish, wildlife, and water resource agencies and private landowners.” This would include salmonid and wildlife management.

PROCESS/COORDINATION

Jurisdictional Coordination/Partnerships

Comment

LG-2 General Comment: For all interested people and parties involved, it's a great frustration to deal with the many different agencies involved. There should be a clear, easy to follow, flow chart showing agency responsibility, any overlap of agency involvement and where to go(which agency).

Response: Each of the Model Watershed programs has recognized this frustration among its constituents. The watershed coordinators have tried to consolidate the permitting process among state and Federal agencies, to act as a clearing house for coordination among agencies, and generally to ease the frustration of dealing with multiple agencies. When and if future watershed programs are funded, this will continue to be emphasized as a part of their work program.

Comment

LG-10 Need integration of federal ecosystem type EISs - each agency looks only at its own area of concern/management - need more global view.

12-06 Several of the ongoing NEPA compliance documents [BPA's watershed EIS, the USFWS/NMFS/BPA hatchery EIS, the USFS/BLM Interior Basin Ecosystem Management Project EIS] need to be coordinated and reviewed in a common light to truly approach an ecological orientation. Language should be added to the DEIS that outlines how these important EISs will be coordinated.

*John Etchart
Chairman
Northwest Power Planning Council*

LB-31 How will this EIS be coordinated with the Upper Columbia River Basin EIS (USFS & BLM)? Look for areas of potential conflict.

18-07 The DEIS should address how it will mesh with other current EISs in the region, such as the USFWS/NMFS/BPA hatchery EIS and the USFS/BLM Interior Columbia Basin Ecosystem Management Project EIS. These should be coordinated and reviewed together in order to ensure that integrated ecosystem planning is truly underway in the Columbia Basin.

*Elizabeth Holmes Garr
Director, Habitat Conservation Program
National Marine Fisheries Service*

LB-34 It is hoped that the Upper Columbia River Basin, state, and local watershed efforts are compatible.

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Response: We have attempted to integrate this EIS with other Federal ecosystem type EISs by proposing to adopt the watershed-based project planning process developed for the US Forest Service's Ecosystem EISs. Our eight-step planning process is adapted from *The Ecosystem Approach: Healthy Ecosystems and Sustainable Economies*, a report of the Interagency Ecosystem Management Task Force, June, 1995. Several of the steps from this report further integration by:

- requiring coordination with other stakeholders, which would include Federal, state, and local agencies (Step 2);
- requiring a characterization of the historical and present site conditions and trends, which would include ongoing ecosystem management activities by other agencies and entities (Step 3).

Each of these steps in this EIS has been modified according to the emphasis of the respective alternative. An example of integration would be if and when the USFS and BLM choose a preferred alternative for the Upper Columbia River Basin EIS (UCRB EIS), this information may be used by individual watershed groups in their own watershed plan development or in coordination with plans developed by individual forests or BLM Districts.

In addition, BPA asked several other Federal agencies whether they wanted to be cooperating agencies on this EIS. The Natural Resources Conservation Service, the Bureau of Reclamation, and the Army Corps of Engineers are the Federal agencies that responded. Because of their cooperating agency status, they will be able to use this EIS for funding watershed projects, once it is finalized. Other Federal agencies could also elect to adopt this EIS in the future.

We have added information to Section 1.5 to address this issue.

Comment

LG-11 Grande Ronde is doing this [watershed planning on the watershed level - Coordinated Resource Management Plan (CRMP) planning is across jurisdictional boundaries and integrated.

Response: CRMPs can be developed on any scale necessary to fit the objectives of the planning effort. CRMPs that cross jurisdictional boundaries will generally better meet the overall goal of ridgetop-to-ridgetop watershed management. As individual watershed plans are developed, this scale of CRMPs will be emphasized.

Comment

YK-15 Watershed restoration projects should be related to and consistent with salmonid management; e.g., Yakama Indian Nation wildlife projects are being planned to provide salmonid mitigation, as well. Watershed projects should address this goal, as well. [Also see **Purpose and Need.**]

Response: The basic goal of watershed plan development and implementation funded by BPA is restoration of salmonid habitat productivity. Please see response to this comment under **Purpose and Need**, page CR/6.

Comment

YK-5 Supports alternatives that broaden the scope of partnerships with existing agencies and coordination with existing planning activities; e.g., WDOE grant-funded planning by Okanogan County and Okanogan Conservation District. [Also see **Alternatives.**]

Response: This concept has and will continue to be a goal of the watershed programs. Each Model Watershed program has taken on the role of being a point of coordination for implementing state programs such as water quality and riparian management. In the case of the Okanogan, coordination with and support of the existing state-funded planning activities will be a major focus of the program.

Comment

SP-27 How do fish and wildlife groups, e.g., Trout Unlimited, get funded for watershed enhancement projects? Can they use their memberships to magnify benefits - free labor, monitoring. [See also **Funding.**]

Response: The Council develops a list of projects that are proposed to BPA for funding under its Fish and Wildlife Mitigation Program. This yearly process generally begins in January, with a solicitation of proposals for continuation of ongoing and new projects. Projects are generally selected by August or September, with new funds available by October 1 of each year. To receive BPA funding, a fish and wildlife group must submit its proposal to the Council and have it prioritized, such that it is recommended for BPA funding. And, yes, these groups can use their memberships to magnify project benefits.

Comments

LB-25 How will all the different watershed groups being formed be coordinated? Some are funded by state, some by BPA, others? [See also **Funding.**]

YK-18 Concern for "partnerships" regarding the funding for watershed projects approved by the Northwest Power Planning Council. [See also **Funding.**]

Response: For the entire Columbia River Basin, there is no coordinating body for watershed activities. Within the Council's Fish and Wildlife Program, Section 3.1D.1 calls for the formation of subregional teams to coordinate watershed, habitat, and

production activities; however, this action has not yet occurred. Depending on the state, there may or may not be a central coordinating body for watershed groups. Oregon has the Governor's Watershed Enhancement Board (GWEB), Washington has a watershed task force under the governor's office and a private organization called the Washington Rivers Council, Idaho has established an organization of basin and watershed groups to deal with water-quality-impaired streams, and Montana has now established state-wide watershed advisory groups out of the governor's office. There is a mixture of control within each state, depending on where the watershed group receives its funding. Watershed groups receiving state or Federal funding would have a certain degree of oversight, depending on the sponsoring agency. In general, watershed groups are not designed to have central control, but to let the work occur from the ground up.

Where BPA has funded watershed groups, partnerships have successfully been encouraged. One of the major parts of a BPA funded-watershed contract has been to actively seek out partnerships in all phases of the watershed planning and implementation. Once a watershed coordinator position has been established, the coordinator has acted as a central point to crystallize partnerships with other Federal, state, tribal and private entities.

Comment

16-23 WSDOT supports development of a management plan to provide guidance for the review of mitigation projects submitted to BPA for funding and for the development of alternatives that would promote consistency in planning and management objectives based on watershed concepts. [Such guidance] may enhance opportunities for WSDOT to coordinate transportation mitigation requirements with priorities established by BPA and the Council. WSDOT may be able to request funding or matching funds for activities that will promote BPA's goals of improving fish habitat, as well as meet our own needs for environmental mitigation and fish passage restoration. The objectives described in Alternative 6 compliment Transportation's interest in moving towards a watershed approach. (See also **Alternatives**.)

*Patty Lynch
Washington State Department of Transportation
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Thank you for your comment. The eight-step project watershed planning process includes a step that addresses involving government agencies (step 2). Partnerships such as those you are proposing are encouraged under all the alternatives of this EIS.

Comment

MS-4 On-site interpretation programs are important to watershed programs. Coordinate with other agencies, i.e. Montana [Department of Natural Resources]. Work with common interpretive goals, e.g., the why vs. don't do it. USFS Lake Koocanusa scenic byway interpretive plan is an example. [Also see **Environmental Impacts.**]

Response: On-site interpretation programs have not been a significant part of the watershed program. To date, however, there are examples of information signs at projects and of education seminars and classes developed by the watershed groups. These have been directly related to projects on the ground, for a hands-on basis of referral. Many of the projects will continue to make small scale interpretive efforts. Agency cooperation, as called for under Step 2 of the eight-step watershed planning process, will generally lead to this sort of cooperative effort. Any large-scale interpretive sites would likely have to be proposed as separate projects within the yearly prioritization process.

Comment

SP-10 Are you working with logging companies to make sure they are observing spawning stream buffer zones?

Response: BPA-funded watershed programs do not have a regulatory role within the watersheds. This role is left to the appropriate state or Federal agency charged with this responsibility. If enforcement of regulations such as stream-side buffer zones were a concern or problem, the watershed groups could act as point of coordination with regulatory agencies, or develop a goal or objective relating to this issue.

Comment

SP-13 Canadians also need to do better watershed work - better if everyone works together.

Response: Transboundary issues of watershed management are being addressed in watersheds in northern Washington, Idaho and Montana. To the extent possible, watershed restoration issues that transcend the Canadian/US boundary will be raised and addressed. To this point, it must rely on cooperation, because the BPA-funded watershed groups have no regulatory authority either within the US or in Canada.

Comment

SP-24 Cost sharing helps in getting projects funded. [See also **Funding.**]

Response: Cost sharing is a required element of watershed funded projects. The Council has set a minimum 10% cost-share level for BPA-funded projects. Cost sharing has typically been in the range of 30 to 50% on many projects. Cost sharing has come in the form of in-kind materials or labor, long term-project operation, and maintenance or direct cash.

Comment

SP-14 Wherever the work begins - must also be done throughout the watershed.

Response: Whenever one type of work, such as road obliteration, is begun within one area of a watershed, it may or may not be extended throughout the watershed. Each project is prioritized on the basis of biological need and opportunity to implement in a given area. When these two parts come together *and* the project is a high priority, a project is implemented.

Comment

SP-25 How do you plan to work across jurisdictions, i.e. Grande Ronde watershed covers two states, multiple agency jurisdictions?

Response: The responsibility for coordination among multiple agencies and states is a part of the contractual obligation of BPA-funded watershed projects. This is usually accomplished by making all participating agencies a part of the watershed council or other oversight body, or part of a technical advisory group. Coordination may take place on an informal basis by correspondence or notification and invitation to watershed meetings.

Comment

SP-20 Accountability and responsibility for meeting program goals must be at lowest level, but need overall framework for program, cohesive way of selecting projects.

Response: Steps 5 through 8 of the Process for Project Implementation in all alternatives will provide the guidance for developing and meeting objectives at the watershed level. In certain large watersheds, there may be subwatershed plans that will tier to the overall watershed goals and objectives. In addition, the Council, in cooperation with the Columbia Basin Fish and Wildlife Authority (CBFWA), is currently updating an overall framework of natural and artificial salmonid production goals, with subsequent habitat maintenance and improvement goals. These will serve as guides for specific watershed plan development.

Comments

04-07 For fifty years, private and government agencies have spent millions and millions on studies and impact statements. Let's start implementing some real projects that will have a true and everlasting effect for the better of all. Thanks for your time and efforts.

Mike Keppler

10-03 A problem . . . is the amount of time that it takes to implement a plan. Often, opportunities are lost before a plan can work its way through the red tape. We would like to have someone investigate the possibility of some agency being able to step in and secure these opportunities until such time as the bureaucracies can get in motion.

*Gordon Stewart,
President
Flathead Wildlife, Inc.*

Response: Early implementation of projects has been a goal of the watershed program. These projects are often called "demonstration" projects, focused on the ability to show how a particular type of action affects the watershed. The ability to put demonstration projects on the ground before a watershed plan is finished is often based on available funding. At present there is no contingency funding held back in the Council's process for such potential projects. Only if a project proponent had the foresight to include this type of request in an funding proposal would such funding be available. A major benefit of this EIS is the expediting of NEPA review and approval of appropriate watershed plans and reduction of the time to implement a plan.

Comment

19-03 Not all projects should be categorically excluded from environmental assessment under NEPA. A watershed assessment should be completed, which identifies priority areas for attention. Participants should reach agreement on certain actions based on that assessment, thereby making individual NEPA processes unnecessary. However, certain types of projects must go through a permitting process, and that may be large in scale or overall environmental effect such that an environmental assessment is warranted. An example is the Methow irrigation conversion project in which the conveyance system for irrigation water [is proposed to be] converted from open canals to a pipeline.

*Richard B. Parkin,
Manager, Geographic Implementation Unit
US EPA*

Response: Not all projects would be categorically excluded under this EIS. Projects covered by the analysis of this EIS may be tiered to this EIS and subsequently excluded from any further NEPA review. Projects that fall outside this analysis would have a separate or supplemental NEPA process completed. In addition, even those projects appropriate for this EIS will undergo site-specific review and permitting, as necessary, for analysis not covered in this document, such as cultural resources and threatened or endangered species.

Comment

05-01 [Regarding the eight-step process] In step eight which is titled “Adapt Management According to New Information” “project managers respond to new information and technology by adjusting management actions, directions, and goals. Management planning, action, monitoring and feedback are established as a continuous cycle.” It is this area of new information and technology which deserves adequate attention as well as action.

*Sidney N. Clouston, Jr.
Clouston Energy Research*

Response: We agree that this is an important part of the process. This step requires that step 7, Monitoring and Evaluating Results, also be a part of the watershed plan. BPA now requires that all projects have a monitoring and evaluation plan and be funded from the project’s implementation funds. In addition, all projects are required to submit yearly and or final project reports which are available to all interested parties, so results and lessons can be shared throughout the region.

Comment

09-01 Commenter agrees that there is a need for a programmatic approach to BPA’s watershed program. Many potential BPA projects can be implemented by existing agencies (e.g., Natural Resources Conservation Service, Idaho Dept. of Fish and Game, USFS, private timber companies, Nez Perce Tribe, and Department of Environmental Quality). To achieve objectives while being cost and administratively efficient, commenter suggests that the alternatives and EIS attempt to achieve these objectives by defining using an interagency approach to project prioritization, implementation, and monitoring . . . because the BPA-funded projects and agencies usually do not have the expertise or resources to achieve the eight steps identified in the DEIS summary. [Also] experience has shown that a NEPA-type effort to solicit comments or consultation with affected stakeholders is not as effective as participation, involvement, and responsibility for projects. BPA should decide not through programmatic level, but by interagency process. This would provide a better tie to project priorities, desired future condition, and site-specific project and monitoring needs within each watershed. Therefore, these would not be prescribed by BPA’s programmatic EIS decision, but on the social, economic, and biological limits and conditions as decided by the interagency effort.

*Herbert A. Pollard II
Regional Supervisor
Idaho Fish and Game, Clearwater Region*

Response: We agree that neither this EIS nor any one single agency has the ability to fully implement a watershed plan. It is not the purpose of this EIS to provide more than a programmatic level of process steps and prescriptions, and an evaluation of a broad range of possible watershed techniques. The watershed groups themselves

will, through the eight-step watershed planning process, ultimately create their own watershed-specific plans. The eight-step process and section 7.7 of the Council's Fish and Wildlife Plan encourage the type of interagency cooperation you are suggesting. If a watershed planning process receives funding from BPA under direction of the Council, both the material from the Council's Fish and Wildlife Program and this EIS will be suggested as contractual requirements. Other processes might be acceptable, if the project proponent had another methodology that would result in the same goals. (Further NEPA review might be required, however.) In all cases, interagency cooperation and the definition of watershed goals and objectives and ultimate implementation of the eight-step process will be developed at the watershed level.

Comment

16-03 Sec 4.2.4: the last bullet (mitigation measures) should include: obtain water rights for withdrawal of water from the state where the project is being considered.

*Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

16-04 Sec 4.2.4 should also have an additional bullet, stating: Coordinate with state and local water resources and water quality agencies to share data collection efforts in project areas.

*Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Your comment (16-03) has been included in the 11th bullet (Section 4.2.4). Your comment (16-04) has been added as the last bullet (Section 4.2.4).

Comment

16-24 The DEIS is inconsistent in its proposed consultations with regulatory agencies. Coordination with local jurisdictions with regard to local ordinances is not addressed. Example: Although [re: wetlands] Corps permits, NRCS, and compliance with the Clean Water Act are mentioned, wetland rating, buffers, and local permits are not. Example: Although USFWS is noted for consultation regarding all major construction projects, state wildlife agencies are not mentioned, even though permits require that state fish agencies are to be contacted for all construction in or near waters of the state.

*Patty Lynch
Washington State Department of Transportation
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

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Response: Under the eight-step watershed planning process, step 2 states that under all action alternatives project managers would consult with affected local government, adjacent landowners, tribes, and state agencies regarding fish, wildlife, habitat, or other issues (see section 2.1.3). Since this is a programmatic EIS that covers several States with differing regulations, we did not include references to specific State and local regulations.

Comment

16-09 Many watershed planning and implementation activities are currently underway in the Columbia Basin; we assume that BPA's watershed program, regardless of alternative, will be coordinated with and complementary to those efforts.

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Yes, this is our intent. Although BPA is not required to do so by law, BPA will coordinate with current watershed planning and implementation activities in the watershed potentially affected by a given project.

Watershed Approach

Comment

19-02 It is important to use a watershed/landscape assessment as a basis for making project proposals and decisions. We understand that BPA intends to use a watershed approach to project approvals. It is not clear from the EIS whether the basis for project area identification, development of desired future condition, and characterization of historical and present site conditions and trends is a watershed/landscape assessment or whether the basis is site-specific. Please clarify the intent of and process for your watershed approach.

We advocate a process in which projects identified in collaboration with agencies, tribes, and interested citizens are based on a thorough watershed/landscape assessment. Absent such an analysis, the validity and usefulness of many project proposals would lie in question.

*Richard B. Parkin,
Manager, Geographic Implementation Unit
US EPA*

Response: The eight-step planning process is designed to be implemented on a watershed basis in all alternatives. This is a watershed-based program, with a focus on ridge-top-to-ridge-top analysis.

Comment

03-07 Even though Alternative 6 would be an effective guideline for approval and acceptance of projects at a local level, it seems to me that the present practice of promoting small projects uncoordinated with adjacent conditions is an inefficient restoration strategy. I think the mode of approving projects which will be diminished by contiguous substandard land and water environments is a reversal of what the process should be.

First, you should analyze the whole stream, identify all problems for its length, determine specific solutions, set priorities for problems most urgently needing reconstruction (regardless of ownership or location). Then each project would augment the general plan. [Commenter gives specific examples following.] Best to set a priority river and work on the entire body than to squander money on isolated small projects that do not have an appreciable effect on the overall incapacity. [Use] a coordinated program to work on all the problems of all the stream at the same time.

Roberta Bates

Response: Your model for analysis and setting priorities is a refinement of a number of the eight steps within the EIS. The ideal application of these steps is always desired, but not always achieved within watershed programs. If a watershed receives BPA funding, they are required to show how project funding requests fit into this model. There are often circumstances that do not permit perfect application of this model, such as the relative willingness of a private landowner to work on his or her land, the availability of funding, or other complicating regulatory or procedural processes. We will follow this type of model as closely as possible in watershed project funding.

Comment

03-08 If a total correlated plan were developed [see comment 03-07; for an entire stream length] and presented to the public, there would be a good response even from private land holders. It would . . . require large sums of money but would be more productive in the long term and save the expenditure of money on useless unrelated projects. [Commenter names Catherine Creek as a good place to apply this approach.]

Roberta Bates

Response: A totally correlated plan with agreement from all of the landowners is indeed a laudable goal. In the ongoing watershed programs this is a goal, but has rarely been achieved. Limitations in funding are often also a complicating factor, due to the overabundance of viable projects. Another issue is "in lieu" funding, i.e., BPA cannot fund projects that are clearly the responsibility of another entity. However, this type of planning will continue to be a goal of BPA-funded watershed programs.

Comment

12-05 We are pleased to see the DEIS emphasize the need for an adaptive management approach. It would be useful to go further and describe what adaptive management might mean in the watershed context [because implementation of such management has proved difficult]. The DEIS provides an opportunity to state expectations more clearly, so that we can establish a solid basis for adaptive management in implementation. The EIS could outline the elements of an organized monitoring and evaluation program, e.g., goals based on assessment of available information, hypotheses addressing critical information gaps, monitoring and evaluation to fill critical information gaps, and an effective feedback mechanism to incorporate new information into implementation activities.

*John Etchart
Chairman*

Northwest Power Planning Council

13-05 Projects must be evaluated to see whether fish are using the instream habitat structures and to identify which structure is preferred by the target species. [Commenter notes variety of such structures in Asotin and Pataha creeks, Grande Ronde and Tucannon rivers.] Without rigorous monitoring and evaluation in each project, we may just keep building the same [possibly ineffective] designs. This issue is the fundamental premise for the Program and needs to be a requirement placed on each proponent before funding. An evaluation effort helps ensure that the program provides substantial benefits to fish and is accountable for expenditures of public funds.

*Steve Martin
WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife*

Response: Steps 7 and 8 of the eight-step watershed planning process describe and require that there be monitoring and evaluation of the projects and that this information be used to adapt and change the plans as needed. Each of the current watershed projects has attempted to implement this concept, depending on their respective abilities to collect and analyze new information. We feel that this principle, like the other seven steps, is best detailed at the watershed level. Each watershed process has a unique infrastructure that can develop its own adaptive management process to meet its particular needs. In addition, this EIS does not address Federal or state land agency management direction. It covers only those projects funded under this watershed program.

Regarding the Tucannon plan: WDFW, as part of the technical committee, has a responsibility to help design an effective monitoring plan for the projects. It is a requirement that all projects have a monitoring component; funds from the project can be used for this purpose.

Comments

SP-26 How will you measure the success of the program?

03-09 How is it possible to estimate the effectiveness of a project without a plan against which to evaluate how successful the project will be toward accomplishing the goal of mitigating the loss of resident and anadromous fish habitat. For instance, if a project is proposed to fence off a mile section of Spring Creek to restore streamside vegetation, how much will that contribute to the health of fish in the Grande Ronde River? What are the overall conditions of Spring Creek and what are the plans for the entire system? Will the project complement the overall plan or will it be liquidated by depleted climates above and below the project location?

Roberta Bates

13-04 Managers need to establish some quantitative measure to gauge success/failure. The Watershed Management Program should resolve this issue and require each manager to establish a goal against which some statistical measure of change (including time element and amount of change) can be compared. Measurable benefits for salmonids should be closely monitored and evaluated by BPA and others [over time]. Ecological monitoring is difficult and requires many years to detect a change, considering the amount of natural variation in most metrics assessed.

Steve Martin

*WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife*

Response: Overall watershed specific mitigation goals are established by the Council's Fish and Wildlife Program, the Council's subbasin plans and the Multi-Year Implementation Program. There have not been any reliable models established to directly quantify the increase in habitat productivity and resulting increases in salmon smolt production. The most reliable attempt at quantification has been in a process called "Ecosystem Diagnosis and Treatment of the Grande Ronde Model Watershed," which estimated the relative changes in habitat productivity between historical and present day conditions. Changes in habitat productivity can be estimated by quantifying changes in specific habitat parameters such as stream temperature and in-stream complexity. Any given habitat project is designed to have an effect on one or a number of habitat parameters. Often these changes are also measured in the trend of a stream system to function as a system, as opposed to a change in one particular parameter. It is the goal of all watershed projects to move towards overall goals and objectives established at the watershed level. Fish habitat productivity based on a watershed context has a goal to receive BPA funding.

Steps 5, 6, and 7 of the common eight-step process establish the principles of setting goals, implementing projects to specifically meet these goals, and monitoring their results. The specific biological goals will be left to the technical teams of the watershed plan. The ability to monitor the effects of any one given

project may be difficult to measure in a system such as the Tucannon, but project implementation monitoring should show whether the project was properly installed and is functioning as expected.

Appendix A (Techniques) outlines the expected results of each technique. Over time, general trends should begin to appear that show progress towards meeting the biological specific goals. It will be much more difficult to show specifically how one project or even a suite of projects has affected smolt production. BPA will rely on the watershed technical committees to set the goals and monitor the progress of the watershed plans.

Comment

03-10 Regardless of the “success” of a myriad of projects on feeder streams, if the Grande Ronde River is polluted, overheated, devoid of shading vegetation and otherwise too degraded for a flourishing fish habitat, the money spent on those projects will be wasted . . . the standards must require some evidence that there will be a lasting improvement in the total watershed system, not just on small tracts that have little influence beyond the site.

Roberta Bates

Response: The watershed-level plans will address these types of priorities for implementing specific projects. Watershed health or recovery will be a sum of the parts, and cannot be measured by the success of any individual project. The cumulative effects of the multitude of small projects will ultimately lead to a “properly functioning” watershed.

Comment

17-01 Regarding Alternative 6 [Balanced Alternative]: . . . The “balance” reached should represent the key factor for determining whether or not effective and measurable habitat improvement would be obtained. Significant changes in some watersheds would be necessary to provide detectable levels of improvement. Efforts to “balance” should not preclude meaningful habitat improvement. However, many aquatic improvement projects would have beneficial environmental components. (See also **Alternative 6**.)

*Preston A. Sleeper
Acting Regional Environmental Coordinator
U.S. Department of the Interior*

Response: We believe the balanced alternative approach is consistent with your comment. We hope to balance habitat improvement against cost and environmental factors, to achieve effective and measurable improvements in watersheds. We agree that in some cases this may involve a significant investment in money or some short-term impact to other environmental resources, and the balance will come in evaluating the long-term benefits of the project against these costs.

Comment

03-11 Millions of grant money could be spent on numerous ineffective projects and there will be little recuperation of habitat or increase in fish count. Farmers and other commodity users might not care because efforts to preserve and protect fish are a nuisance [to them] at best. Commenter feels that these interests might benefit financially from projects but fish would still disappear. Leaving the approval of projects in the hands of local water resource users could insure that [money be wasted and the fish problem worsen].

Roberta Bates

Response: BPA-funded watershed habitat projects are developed and funded on a *voluntary* basis. BPA is not a regulatory agency, and cannot force projects on anyone. All projects submitted to BPA for funding have to have a clear biological connection to increased habitat productivity for salmonids. Often there is a connection between habitat restoration projects and benefits to private landowners. There is always a requirement for cost sharing in such cases. Watershed programs on private lands will not be successful without the cooperation of the affected landowners.

Comment

03-12 Please always keep in mind the goal of fish protection and total habitat enhancement against which to evaluate the best results possible for the money spent. Will these projects truly accomplish benefits for fish? (We ask: "At the present rate of project implementation and restoration, how long, how much time will it take, for the waterways to be restored to a flourishing condition where fish and wildlife are thriving, healthy and productive.") We do not think that is possible without a comprehensive plan for the Grande Ronde River Watershed.

Roberta Bates

Response: Cost effectiveness will always be a goal of implementing watershed projects. We always want to achieve the maximum results for the dollars expended. This is why the Grande Ronde and other watersheds have tried to develop and implement their watershed plans based on achievable and measurable goals and objectives. The amount of dollars needed for full plan implementation can only be estimated, pending more detailed subwatershed and (ultimately) project-specific plans. Funding of any given project or suite of watershed projects will still be subject to the Council's annual prioritization process, where there will always be more projects than available funds.

Comment

16-07 Specific projects should be evaluated in a watershed context; one which considers watershed processes such as basin hydrology, instream flow, sediment delivery and routing, water quality, riparian area and wetland extent and condition, and fish access and passage.

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Thank you for your comment. This issue is addressed in FEIS section 2.1.7 for Alternative 6 under step 4, bullet #1.

Comment

16-08 To meet objectives for fish and wildlife, addressing limiting factors is essential for long-term success. An analysis of limiting factors (for each life history stage) in a watershed should be conducted and incorporated in the watershed plans before specific projects to meet these objectives are implemented. Monitoring of outcomes, coupled with adaptive management, are also essential to realize the full potential of the mitigation funds and activities.

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: We agree. Steps 3 - 5 and 7 of the EIS's eight-step watershed process inherently require some form of a limiting factor analysis, plus monitoring of the results. Also, when the Council selects a watershed for funding, we use language from section 7.7B.2 as additional guidance in developing contracts with the watershed proponents. That section contains specific language that deals with identification of key limiting factors for each life history stage.

Comment

18-06 [In addition to language supporting an adaptive management approach] the DEIS should also contain language describing how such an approach would be used in a watershed context. In this instance, adaptive management would call for ongoing monitoring and evaluation of results, impacts, data gaps, etc. on both the project and watershed levels. The watershed management program should thus include a clear monitoring and evaluation component.

*Elizabeth Holmes Garr
Director, Habitat Conservation Program
National Marine Fisheries Service*

Response: Thank you for your comment. This comment is addressed under Section 2.1.1, Step 7, which explicitly states that project managers are to monitor conditions and evaluate results.

Comment

18-04 Restoration actions are appropriate only after the causes of habitat degradation have been identified and remedied, and natural, passive restoration has demonstrably begun. Only within this context will active projects accelerate the underlying trend (and then only if well-designed). Outside this context, active restoration projects are at best unlikely to be effective, and could sometimes be harmful.

*Elizabeth Holmes Garr
Director, Habitat Conservation Program
National Marine Fisheries Service*

Response: We agree. The EIS's eight-step process, when properly applied, will provide the context for restoration to occur when underlying management changes are also addressed.

Public Involvement/Decisionmaking

Comments

LB-9 More emphasis on local control shown in EIS.

LB-26 Like the idea that local government is involved - has been left out of other programs.

13-07 We support the concept of local involvement in planning and decision making encompassed in the model watershed program. We ask that BPA and committees associated with the Fish and Wildlife Program carefully evaluate all model watershed programs to ensure effective use of monies and substantial benefits to salmonids. (Also see **Funding**.)

*Steve Martin
WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife*

Response: The premise of the EIS and the BPA watershed planning process is that local watershed groups (1) decide what the specific issues are for each watershed and (2) come to consensus on the best ways to address these issues. BPA is proposing broad planning guidelines for this process, but would not be involved in specific decisionmaking in the individual watersheds. Therefore, there is a great deal of local control in the process.

Comments

SP-28 What are the weaknesses of “going local” with the decision making process?

LB-12 Politicization of advisory groups is flawed at the local level. Take politics out!

Response: Several commenters have pointed out the possibility of local watershed advisory groups becoming “politicized,” and proposing projects that may not be the most ideal from an overall watershed or cost standpoint. This may be a weakness of the localized process. However, it is not BPA’s policy to direct watershed planning in local watersheds. The proposed standardization of the planning and implementation process will help avoid this problem. Also, the Council’s prioritization and scientific review processes will help ensure the integrity of the process through their recommendations as to which projects actually receive funding from BPA.

Comments

SP-5 Who has the broader picture planning responsibility and the final say over the process?

SP-3 Does Northwest Power Planning Council have any say over how the projects are planned and implemented?

Response: BPA’s proposed standards and guidelines would guide the broader-picture planning by requiring watershed projects funded by BPA to be developed through the eight-step planning process outlined in the EIS. The Council would review, prioritize, and recommend projects for funding by BPA. We anticipate working closely with the Council throughout this process.

Comments

MS-2 There needs to be a continual link for the project manager to go back to the city councils and public entities.

MS-3 Formalize a plan for BPA and watershed council to involve public on a continual basis regarding each step or phase of the project planning process.

03-01 Of especial importance are: (1) [The step on involving stakeholders in Alternative 6]. This is a major consideration when spending public monies for projects involving resource essential for public welfare. There has been very little public input outside the immediate circle of the Grande Ronde Model Watershed and those connected with it. [Also see **Alternatives**.]

Roberta Bates

13-06 Each model watershed project should include public meetings and public outreach efforts at the local community level to educate participants in the watershed program and the general public about the local habitat problems and fish needs. Too often steering committees become isolated from the general public.

*Steve Martin
WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife*

MS-1 There is no reference to informing public in the 8-step planning process.

Response: Step 2 of the planning process, "Involve Stakeholders," is the link between the project sponsor and the public and public entities. As stated in section 2.1.1, this step involves gathering input from affected agencies, landowners, tribes, individuals, and organizations. "This step is similar to the project scoping and public involvement that occurs in a NEPA analysis. Interested parties may include individuals; interest groups; tribes; and county, state, regional, or Federal agencies." We will add local governments to this list.

Comment

SL-1 Cooperation is key - ranchers are willing to cooperate if they are asked - but not when they are forced.

Response: All BPA-funded watershed projects are undertaken with voluntary partners, and ranchers will be welcome.

Comment

SL-3 How were the original 6 model watersheds identified? - They (especially Idaho ones) are so far upstream in the watershed. [Also see **Miscellaneous.**]

Response: In the fall of 1992, the Council amended its Fish and Wildlife Program with several "Early Action" projects. The Model Watershed projects were among these. The states of Oregon, Idaho, and Washington were directed to choose one or more "Model" watersheds for this program. Each state, under the lead of one state agency such as the Department of Water Resources in Oregon and the Conservation Commissions in Idaho and Washington, brought several state and sometimes Federal agencies together to make the selections. Each used a prioritization process combining a variety of biological and social factors to select the watersheds. These selections were approved by the Council, and BPA began to fund their implementation in late 1992 and early 1993.

ALTERNATIVES

GENERAL

Comment

YK-5 Supports alternatives that broaden the scope of partnerships with existing agencies and coordination with existing planning activities; e.g., WDOE grant-funded planning by Okanogan County and Okanogan Conservation District. [Also see **Process.**]

Response: The eight-step planning process encourages coordination and partnerships wherever possible. Alternatives 2 - 6, the action alternatives, are based on the eight-step planning process.

Comment

KL-3 Likes the way EIS alternatives lay out what needs to be done for proposed projects.

Response: Thank you for your comment.

Comment

18-02 We agree that the recommended alternative (Al. 6) provides the most reasonable approach [to meeting the objectives]. This alternative would be more efficient and consistent than the current process (No Action). However, we note that of the six alternatives provided, four were components of the sixth alternative. To be consistent with the intent of NEPA, an EIS should provide distinct and viable alternatives.

*Elizabeth Holmes Garr
Director, Habitat Conservation Program
National Marine Fisheries Service*

Response: Thank you for your comment. We believe that these are distinct and viable alternatives. Each alternative provides a different emphasis to approaching watershed management.

Comment

SP-2 Alternatives allow people an "out." Will apply only what they want.

Response: The five action alternatives were developed for purposes of the EIS. Only one will ultimately be selected by BPA in the Record of Decision.

ALTERNATIVE 6

Comments

LG-1 Prefers Alternative 6 - combines best of all alternatives.

LB-11 Support Alternative 6!!

LG-5 Likes Alternative 6 - especially emphasis on sustainability of projects and monitoring and evaluation.

08-01 Alternative 6 is the most agreeable.

*Joseph R. Maroney
Fisheries Program Manager,
Kalispel Tribe of Indians*

10-01 [Flathead Wildlife Inc] agrees with BPA that the Balanced Action alternative is preferred over the other five.

*Gordon Stewart,
President
Flathead Wildlife, Inc.*

12-02 The Council supports Alternative 6 and agrees with the following points in the DEIS

- that Alternative 6 provides the most balanced approach to meeting aquatic habitat objectives of watershed management projects, achievement of cost and administrative efficiency, and protection and improvement of other environmental resources when those actions would support watershed management.
- that Alternative 6 would implement such programs and projects more efficiently and with greater consistency than under the current case-by-case basis.
- that other alternatives are not adequate to fully meet the needs of the watershed program.

*John Etchart
Chairman
Northwest Power Planning Council*

KL-1 Strongly support Alternative 6. Oppose Alternatives 3 & 4. Alternative 3 is too much of a "techno-fix". Alternative 4 promotes low cost but temporary fixes.

LB-8 Alternative 3 - 5 are "no brainers." Alternative 6 is the only one that would make sense in this EIS. Alternative 6 should be broken down into other alternatives under it.

YK-19 Believes 6 can fit with other planning activities if it encompasses components of other alternatives. (Review to make sure!)

05-04 As in most cases, a balanced approach is best. [Alternative 6] . . . embraces most of the good elements of each alternative. Nevertheless, the need of specific projects that improves habitat exists.

*Sidney N. Clouston, Jr.
Clouston Energy Research*

03-01 Alternative 6 . . . will provide the best protection for the fish and related environmental conditions. Of especial importance are: (1) [The step on involving stakeholders]. This is a major consideration when spending public monies for projects involving resource essential for public welfare. There has been very little public input outside the immediate circle of the Grande Ronde Model Watershed and those connected with it. [Also see **Public Involvement**.]

Roberta Bates

03-02 Alternative 6 . . . will provide the best protection for the fish and related environmental conditions. Of especial importance are: (2) “Identify a desired future condition that is self-sustaining (low maintenance), including the development of a sense of responsibility and ‘ownership’ in the general public for watershed conditions.”

Roberta Bates

03-03 Alternative 6 . . . will provide the best protection for the fish and related environmental conditions. Of especial importance are: (3) establishing baseline information for watershed against which change can be measured.

Roberta Bates

03-04 Alternative 6 . . . will provide the best protection for the fish and related environmental conditions. Of especial importance are: (4) including as project goals “protection and improvement of a variety of fish habitats . . .” and “development of riparian habitat that can benefit water quality, fish and wildlife.” Surely these requirements all should be incorporated in every project that boundarys the water. [Also see **Techniques**.]

Roberta Bates

16-06 Of the alternatives presents, [WDFW] supports Alternative 6. it appears to provide the best all-around approach for evaluating, ranking, implementing, and monitoring watershed projects. [Commenter has specific questions/comments; see other **16**-identified comments.]

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Thank you for your support of Alternative 6, BPA’s preferred alternative.

Comment

19-04 Decrease emphasis on use of pesticides and herbicides. To prevent pollution of soil and water, protect fish, wildlife, and humans, and to foster overall system health and resilience, we ask you to decrease the emphasis upon use of pesticides and herbicides in your preferred alternative. We suggest that Alternative 6 reflect infrequent use rather than moderate use of pesticides and herbicides (Table 2-1). (See also **Techniques**.)

*Richard B. Parkin,
Manager, Geographic Implementation Unit
US EPA*

Response: This change has been made to the EIS.

Comment

16-23 WSDOT supports development of a management plan to provide guidance for the review of mitigation projects submitted to BPA for funding and for the development of alternatives that would promote consistency in planning and management objectives based on watershed concepts. [Such guidance] may enhance opportunities for WSDOT to coordinate transportation mitigation requirements with priorities established by BPA and the Council. WSDOT may be able to request funding or matching funds for activities that will promote BPA's goals of improving fish habitat, as well as meet our own needs for environmental mitigation and fish passage restoration. The objectives described in Alternative 6 compliment Transportation's interest in moving towards a watershed approach. (See also **Purpose and Need**.)

*Patty Lynch
Washington State Department of Transportation
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Thank you for your comment. The eight-step project watershed planning process includes a step that addresses involving government agencies (step 2). Partnerships such as those you are proposing are encouraged under all the alternatives of this EIS.

Comment

18-05 [Context: NMFS concern for aquatic habitat objectives and sustainability of habitat improvements] The following elements should be included in BPA's preferred alternative (Alternative 6):

- All projects funded by BPA's watershed program should address problems or opportunities that have been identified in a watershed assessment. [Otherwise]

it is likely that many projects will be funded which will not address the needs and priorities identified on a watershed or ecosystem level.

- Develop a Statement of the Desired Future Condition: Consider concepts that include sustainable revenue generation (e.g., crop production, timber harvest) to reduce initial or long-term Federal costs, as long as they are consistent with aquatic habitat objectives (from Alternative 4).
- Characterize the Site Conditions and Trends: identify and map soil conditions, topography, hydrology, vegetation, and other physical and biological systems within the areas proposed for watershed management projects (from Alternative 3).
- Establish Project Goals: add to the statement beginning “protection and improvement of a variety of fish habitats . . .” to include (after “protective cover”) “especially for high-quality native or other habitat or species of special concern (whether at the project site or not), including endangered, threatened, or sensitive species” (from Alternative 5).
- Monitor Conditions and Evaluate Results: The BPA should encourage and support the more rigorous and comprehensive management objective monitoring that is included in Alternative 3.

*Elizabeth Holmes Garr
Director, Habitat Conservation Program
National Marine Fisheries Service*

Response: All projects that receive BPA funding must pass through the Council’s prioritization process. This process should address the problem of funding projects outside of the watershed priorities. Also, if the eight-step process is used, this should not be a problem.

Changes have been made to reflect your suggestions, as follows: to the desired future condition of Alternative 6; to the site conditions and trends; to project goals of Alternative 6.

We feel that the monitoring requirements of Alternative 6 will be adequate to meet the needs of comprehensive watershed management and supply the information needed for step 8, adaptive management.

Comments

LG-7 Concern that “balanced” approach gives equal weight to cost, other environmental resources, and fish mitigation. Fish mitigation should have a priority. [Also see **Priorities.**]

SP-29 What are the administrative drawbacks to the implementation of Alternative 6?

LW-1 Alternative 6 sounds kind of “warm and fuzzy.” The language of thought may sound politically correct, but it may prove difficult when it comes down to deciding which priorities in each alternative you want to follow.

LG-3 Page 23 [Alt. 6] - Concern about statement re: avoiding impacts to local economics related to the environment. Will this allow good projects to be eliminated? Would like to see this statement eliminated.

02-02 The watersheds’ overriding concern must be restoration of the riparian areas and wetlands destroyed and damaged by the hydroelectric system. Concerns about local economics, costs, culture and the like must take a back seat. Alternative 6 will jeopardize efforts to save riparian species by giving other interests which are not in jeopardy the same level of consideration.

Mark Tipperman

04-03 Alternative 6 has too many action alternatives [action items] and by the time all are addressed, nothing or little will be done because of adverse impacts on land, economies, recreation, etc.

Mike Keppler

17-01 Regarding Alternative 6 [Balanced Alternative]: . . . The “balance” reached should represent the key factor for determining whether or not effective and measurable habitat improvement would be obtained. Significant changes in some watersheds would be necessary to provide detectable levels of improvement. Efforts to “balance” should not preclude meaningful habitat improvement. However, many aquatic improvement projects would have beneficial environmental components. (See also **Alternative 6**.)

*Preston A. Sleeper
Acting Regional Environmental Coordinator
U.S. Department of the Interior*

Response: Alternative 6 does give a balanced approach to cost, environmental resources, and aquatic habitat objectives. However, fish habitat improvement would be recognized as the project priority.

We cannot predict what administrative problems might arise for individual projects. The management feedback loop described in Step 8 of the watershed planning process, however, would respond to administrative or other drawbacks as they emerge during a project.

Human-related resources are regarded by the Council on Environmental Quality as environmental resources to be protected; therefore they are noted not only in Alternative 6 but also under Alternative 5 (General Environmental Resources). Please see also the response to comment 07-01 (below).

Fish habitat improvement would be recognized as the project priority under Alternative 6, but those projects that favor multiple resource benefits would receive priority for funding.

We believe the balanced alternative approach is consistent with your comment. We hope to balance habitat improvement against cost and environmental factors, to achieve effective and measurable improvements in watersheds. We agree that in some cases this may involve a significant investment in money or some short-term impact to other environmental resources, and the balance will come in evaluating the long-term benefits of the project against these costs.

All comments have been noted. Thank you.

OTHER ALTERNATIVES

Comments

LW-2 Alternative 5 is probably the one to try and achieve. Once you achieve a good base of environmental protection and restoration, the rest of the system will maintain or repair itself while still providing the amenities that you list. Restore and maintain the basic wildlife and habitat structures necessary and the rest of the system will follow. A lot can be accomplished by administrating the current laws on the books, such as the Washington Forest Practices Act and the Clean Water Act.

Response: BPA and the Northwest Power Planning Council agree that Alternatives 2 - 5 are not adequate to fully meet the needs of the watershed program. However, your comment has been noted.

Comments

04-06 [The EIS should] stop being concerned with impacts to man and commercial use and look at strictly Nature's need for free flowing unmanipulated use of the water ways and adjacent lands. [Ref: Alt. 5] [Also see **Impacts/ Socioeconomics.**]

Mike Keppler

07-01 Commenters prefer Alternative 5, General Environmental Protection. The protection of our environmental resources must take top priority. By protecting these resources, we will receive the most benefits to all interests in the long term.

*John M. Skovlin
Donna Skovlin*

Response: According to the Council on Environmental Quality (CEQ), under the "Regulations For Implementing the Procedural Provisions of the National Environmental Policy Act" (1992) it states that the effects and impacts of a proposed action shall include ecological, aesthetic, historic, cultural, economic,

social, or health, whether direct, indirect, or cumulative. CEQ also states that we are to avoid impacts on the “human environment” which is interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment. Therefore, the EIS will continue to be concerned with impacts on humans.

Comment

06-02 [Alternatives 4, 5, and 2] take too many other factors into account. The main emphasis of the EIS is to “repair” lost habitat due to the dams. Alternatives 4, 5, and 2 do this to a much less extent than Alternatives 3, 1, and 6.

Steve Wegner

Response: Thank you. Your comment has been noted. BPA has identified Alternative 6 as the preferred alternative.

Comment

16-15 Re: Alt. 5: Page 2/19, top: Delete word “non-target.” [Seems inconsistent with previous paragraph and intent of this alternative.]

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: We agree; this change has been made.

Comment

16-16 Re: Alt. 5: Page 2/20, pr. 4, first bullet: Delete word “ecological” (may be narrowly interpreted) and replaced with “natural resources.”

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: We believe that “ecological” is broader than “natural resources.”

Comment

16-17 Re: Alt. 5: Page 2/21, pr. 6: What is the difference [between] the term “side benefit” as it is used here and “coincidental benefits” used in Alt. 3? The use of the term “side benefits” seems inconsistent with the intent of this alternative. The preceding pr. states that under this alternative BPA would encourage project managers to include social, economic, cultural and natural resource protection and improvement goals. Protection and improvement goals for natural resources (wildlife) seems to indicate an expectation of more than a “side benefit.”

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: We agree; the change has been made.

Comments

LW-3 Alternative 4 - Be careful: you don't necessarily want the cheapest technique, but the technique or project that will give you the best value. The two are not always the same. Spend your money wisely, not frugally. [Also see **Funding**.]

04-02 Regarding Alternatives 1 and 4: Not enough is being done and policies in effect such as drawdowns are more adverse than effective as far as wildlife and aquatic habitat is concerned.

Mike Keppler

05-05 The entire watershed of the Columbia and Snake rivers are not involved. It cannot be involved with Alternative 4 part of the Snake River is effectively eliminated as spawning habitat, due to dams without fish ladders. It would be cost prohibitive to try to open up the areas above those dams.

*Sidney N. Clouston, Jr.
Clouston Energy Research*

Response: Thank you. Your comments have been noted.

Comment

06-01 Alternatives 3 and 1 are best. They best support your purpose and need statement of “mitigation for anadromous and resident fish habitat lost during development of the FCRPS.”

Steve Wegner

Response: Thank you. Your comment has been noted.

Comment

04-01 *The best alternatives are* to design and construct natural-feeling and looking water flows around all man-made structures that deter fish from migrating up or down old natural water routes to spawning areas instead of spilling over and/or through dams and other obstructions. [Commenter nominates Alternative 3 as best.]

Mike Keppler

Response: The specific design of passage structures will depend on the site conditions. Use of side channels or other bypass waterways may be considered as an alternative. Other considerations such as cost, current land use, location, gradient, and so on, will also be used to determine the best choice.

Comment

04-04 The more restoration of habitat the better. It can only enhance the quality of life of all creatures including man. [Reference: Alternative 3]

Mike Keppler

Response: Thank you. Your comment has been noted.

Comments

11-06 Alternative 3 prescribes the kind of habitat-based prioritization that will produce long-lasting benefits at the most reasonable cost. Upland areas, roadless areas and mainstem riparian areas need to be protected and maintained as [while] impaired habitats, only partially supporting biological diversity, are restored. It makes no sense to destroy aquatic refugia that includes strongholds of high quality habitat. Moratoriums on land-disturbing activities in core watersheds with high quality habitat is the best way to ensure self-sustaining viable populations of sensitive and rare species. A system of core areas, buffers and connecting corridors using the principles of Conservation Biology is a sensible “best available science” approach to prioritizing BPA projects.

Steve Kelly and Mike Bader

Friends of the Wild Swan, Inc./Alliance for the Wild Rockies, Inc.

LG-13 Need to prioritize so that the stream itself is given priority over upland practices (e.g., noxious weed control). This can also be looked as giving Alternative 3 the priority alternative. [Also see **Priorities.**]

LB-7 Alternative 3: Aquatic habitat is not the only thing that needs to be mitigated.

02-01 . . . no alternative except 3 will fulfill BPA's obligation to mitigate the adverse impacts of the Northwest Hydraulic [Hydroelectric] System. . . . The watersheds' overriding concern must be restoration of the riparian areas and wetlands destroyed and damaged by the hydroelectric system.

Mark Tipperman

11-07 Alternative 3, however, has its downside [see comment 11-06]. Words like "flexibility" for project managers, "adaptive management" and other weasel words cannot be left undefined. FS, BLM, state school trust lands managers abuse these words to delay action. Define them in full detail to prevent abuses of management discretion and unreasonable delay. Don't use any language that could be used to subvert the goals and objectives of Alternative 3. If that alternative is redesigned to get results it could begin to make significant improvements over the status quo. If legal loopholes are not sealed tightly, improvements to aquatic ecosystems will be hard to come by.

Steve Kelly and Mike Bader

Friends of the Wild Swan, Inc./Alliance for the Wild Rockies, Inc.

Response: Please see response to comments 12-05 and 13-05, page CR/18.

Comments

14-04 With all the recent findings on the demise of the Columbia River Basin Ecosystem we feel that the DEIS's Alternative 3 should be developed and expanded in the Final EIS. This alternative with an Aquatic Habitat Objectives Emphasis is needed to curtail the many "train wrecks" occurring to the many aquatic dependent species.

Robert Ament

Resource Specialist, American Wildlands

14-05 We support an emphasis on the whole watershed rather than simply on riparian and in-stream habitat. Recent flooding and landslides throughout the region were often a result of management activities further from the watercourses than Alternative 3 contemplates. Thus Alt. 3 should be changed to aggressively restore a much larger land area under BPA approved management/mitigation activities. This also will ensure a sounder ecosystem approach.

Robert Ament

Resource Specialist, American Wildlands

Response: BPA has designated Alternative 6 as its preferred alternative, because it incorporates Alternative 3's aquatic habitat objectives, while balancing cost efficiency and protection of environmental resources. Under Alternative 6, fish habitat improvement would still be recognized as the project priority. However, we believe that the priority on aquatic objectives needs to be balanced to 1) achieve the most mitigation possible with the limited funds available, and 2) take

into consideration impacts on other environmental resources that could occur as a result of watershed mitigation work. For example: large-scale ground-disturbing work could be contemplated under an “aggressive” watershed approach under Alternative 3. We feel that the costs and potential impacts on water quality and cultural resources from such a project need to be taken into account.

Comments

KL-2 Base response [Alternative 2] is what is already happening.

05-03 Alternative 2 . . . does not address “Many Best Management Practices” [because they are not required by law]. It would cause a loss of many good opportunities of productive collaborations, benefiting many groups and programs. [Commenter gives as example prescriptions for training and employment at-risk youth to do project work.]

*Sidney N. Clouston, Jr.
Clouston Energy Research*

Response: Thank you for your comments. Because it includes all legal requirements, Alternative 2 is the base for (and therefore part of) the other action alternatives. Alternative 6 does include BMPs. Please also see the first program-wide mitigation measure under the Economics discussion in Chapter 4 (section 4.7.4).

Comment

16-14 Ref: Alt. 2: Sec. 2.1.3, Step. 2, Involve stakeholders: Because this EIS focuses on fish and fish habitat, “consultation with affected tribes, and state fish and wildlife agencies” may be interpreted as consultation with the fisheries programs within the affected tribes etc. Change sentence to read: “Consult with affected local government, adjacent landowners, tribes, and state fish and wildlife agencies regarding fish, wildlife, habitat, or other issues.”

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: This change has been made. We have also dropped “fish and wildlife” to indicate that consultation should be with all affected state agencies.

Comment

05-02 A status quo process [Alternative 1, No Action] ought not to be selected [because it has no provision for taking new information into account]. New is not always better, but it is often better when experience and other feedback sheds more light.

*Sidney N. Clouston, Jr.
Clouston Energy Research*

Response: Thank you for your comment. We agree.

TECHNIQUES

Comment(s)

05-06 It would be cost-effective to improve available habitat and enhance other areas. The greenbelting of water ways are dual purpose projects that are cost effective because it will benefit wildlife as well as fish. Spawning habitat and migration supporting improvements (i.e. food production) are necessary all along the streams and rivers to the ocean. A balanced approach with BMPs will bring about the best actions in project implementation and where management according to new information would not be constrained in adaptation within the preferred approach.

*Sidney N. Clouston, Jr.
Clouston Energy Research*

Response: We agree; a balanced approach would provide the most benefits to a variety of species and habitat areas. Alternative 6 does give a balanced approach to cost, environmental resources, and aquatic habitat objectives. The various techniques outlined in Appendix A would help to achieve improved spawning habitat and migration improvements.

Comment

19-05 Eliminate "wildlife harvest" as a management technique. If forage is lacking, it makes more sense to reduce cattle grazing and restore areas degraded by human alterations of the ecosystem than to eliminate wildlife. Compared to the effects of cattle grazing and other human-induced alterations to the ecosystem, wildlife have little impact and are a natural, integral component of the system. (See also **Impacts: Wildlife.**)

*Richard B. Parkin,
Manager, Geographic Implementation Unit
US EPA*

Response: This technique will be retained as a possible, though infrequently used, management tool. A watershed analysis will indicate whether livestock grazing controls are needed for vegetation management. It may be possible that, even after

livestock management controls, wildlife are still a part of the problem. This technique would be used only after a thorough analysis of all alternatives, but is one that we believe should be retained as one of the tools.

Comment

05-07 [Commenter cites the Council's Fish and Wildlife Program, section 13.aF "Promising New Ideas for Improving Salmon Survival"]: "This measure is intended to provide an expedited process to encourage innovative approaches to improving salmon survival." Adaptive management would set aside some small percentage for research, development, and demonstrations (RD&D). This is important when wetlands, riparian zones or greenbelt areas are created. Managers must be mindful of wild and scenic river guidelines and opportunities that BMPs can be applied to. New methods and new technology in the balanced approach should not be excluded because of its newness, but at least pilot demonstrations should be developed and applied where appropriate

*Sidney N. Clouston, Jr.
Clouston Energy Research*

YK-10 Need to address canal system operation through use of automated check structures, instrumentation, and data telemetry and re-regulation.

Response: Adaptive management has been built into the planning process for all action alternatives. In addition, provision for adaptive management ideas and new technology has been expanded in descriptions of Alternatives 2, 3, and 6 in Chapter 2 of the final EIS. Also, techniques that are funded and implemented under this program are not required to be modeled to the letter. As long as the intent of a technique is met, reasonable modifications and adaptations of the technique as presented in the EIS may be allowed.

Comment

03-04 Of especial importance [in Alternative 6] are: (4) including as project goals "protection and improvement of a variety of fish habitats . . ." and "development of riparian habitat that can benefit water quality, fish and wildlife." Surely these requirements all should be incorporated in every project that boundarys the water. [Also see **Alternatives.**]

Roberta Bates

Response: All alternatives presented in the draft EIS will require funded projects to address and achieve aquatic habitat objectives. As illustrated in Table 2-3, however, there is a range of performance among alternatives with regard to how (or, the degree to which) the objectives are met.

Comment

06-03 Make sure that the actions you fund do not result in added damage. We in the [US Forest Service] have been using the “ROSGEN” techniques to analyze and plan stream restoration projects. Commenter suggests various restoration techniques that can include rootwad revetments, resculpting of floodplains, vortex-rock weirs, and various other types of in-channel structures.

Steve Wegner

Response: Technique 1.3 (Appendix A) addresses this concern, and is suggested for frequent or moderately frequent use in most alternatives, including the preferred alternative.

Comment

11-02 Please fund projects that prioritize preventative measures. In many cases preventing more aquatic habitat damage is more important than mitigating for past actions. Roadless areas are currently maintaining the most successful bull trout and westslope cutthroat trout populations in the Snake and Columbia River system. Many of these areas are not protected. Preventing the destruction of roadless areas and upland headwaters regions is cost effective and provides long-term benefits to many aquatic lifeforms.

*Steve Kelly and Mike Bader
Friends of the Wild Swan, Inc./Alliance for the Wild Rockies, Inc.*

Response: Alternatives 3, 5, and 6 (the preferred alternative) require projects to consider planning goals that both protect high-quality habitat (as types of refugia) and restore degraded habitat. Also, the acquisition of “key” riparian areas specifically for the management and protection of riparian-dependent aquatic habitats has been added as a technique under section 2 of Appendix A.

Comment

11-01 We hope that BPA will **not** support at least the following things: (1) State and/or federal hatcheries and stocking programs to “restore” bull trout and other native fishes; (2) poisoning streams to control exotic species like brook trout, pike, or other introduced non-native species; (3) overly aggressive electro-shocking to verify “viable populations” of native fishes in areas coveted for logging, grazing, mining and other pollution-causing activities; (4) projects that fragment or reduce the size and habitat quality of roadless refugia; and (5) projects that are linked to extractive, consumptive use projects (i.e., Forest Service timber sales that rely on KV funds and unkept promises to accomplish road restoration).

*Steve Kelly and Mike Bader
Friends of the Wild Swan, Inc./Alliance for the Wild Rockies, Inc.*

Response: This programmatic EIS supports a watershed management approach to the mitigation and restoration of fish habitat. Species-specific management techniques, including the funding of hatchery and stocking programs, are not within the scope

of this EIS. The concept of habitat fragmentation at large scales applies primarily to wildlife. However, consideration of high-quality aquatic habitats and their recognition as refugia are considered in the planning process in Alternative 3 (Section 2.1.4, steps 1 and 5) and Alternative 6 (Section 2.1.7, steps 1 and 5). Also, the acquisition of "key" riparian areas specifically for the management and protection of riparian-dependent aquatic habitats has been added as a technique under section 2 of Appendix A. It is possible (within the scope of this programmatic EIS) that projects involving Forest Service partnership may be considered and approved for funding. By law, however, BPA cannot and will not fund Forest Service work that they are already required to fund by law or Congressional directive.

Comment

19-04 Decrease emphasis on use of pesticides and herbicides. To prevent pollution of soil and water, protect fish, wildlife, and humans, and to foster overall system health and resilience, we ask you to decrease the emphasis upon use of pesticides and herbicides in your preferred alternative. We suggest that Alternative 6 reflect infrequent use rather than moderate use of pesticides and herbicides (Table 2-1). (See also **Alternatives**.)

*Richard B. Parkin,
Manager, Geographic Implementation Unit
US EPA*

Response: This change has been made to the EIS.

Comment

06-04 Because your purpose and need is to mitigate lost or damaged fish habitat your considerations need to start with in-channel work but also include floodplain concerns and upslope activities, especially on private lands.

Steve Wegner

YK-16 A wide range of techniques and publics should be funded as long as the benefits accrue directly or indirectly to fish. [Also see **Priorities**.]

Response: This EIS considers a watershed-based approach to the mitigation and restoration of lost fish habitat. This includes a variety of in-stream, riparian, and upland practices that may be useful in implementing a variety of improvement projects. The standardized planning process common to all action alternatives provides for identification of degraded conditions, improvement needs, and restoration options on either a project or watershed basis, and requires the involvement of as many stakeholders as possible, including private landowners.

Comment

17-02 The . . . techniques are appropriate although some may be more helpful in promoting effective agriculture, forestry, or urban development strategies rather than being priority fish habitat techniques. More efficient irrigation practices would not benefit fish if they only free more water to irrigate additional land.

*Preston A. Sleeper
Acting Regional Environmental Coordinator
U.S. Department of the Interior*

Response: In drafting this programmatic EIS, we tried to include as many techniques as possible that would in some way help improve fish habitat. The reasons for this were 1) that we wanted to encourage a true watershed approach that recognizes the connectedness of the entire watershed, from ridge-top to ridge-top, and 2) to provide as much flexibility as possible. We agree that not all of the techniques would be appropriate in all cases, and that we need to make sure that proposed techniques will actually result in improvements to fish habitat. Steps 3, 5, 6, 7, and 8 of the eight-step standardized planning process include requirements that any technique proposed for implementation be consistent with the desired future condition and project goals, that conditions be monitored and results evaluated, and that techniques be adapted based on the results obtained.

Comment

LW-8 [Appendix] Section 8.4.1: Reasoning is not correct or complete. Some chemicals with rapid decomposition ability can be used with a Streamside Management Area (SMA). That would be more environmentally responsible and effective than hand techniques that cause more site disturbance.

LW-9 Totally eliminating all chemicals within a SMA is incorrect.

Response: Technique 8.4 (Appendix A) does not always preclude chemical use in SMAs; it is recognized as a prudent practice in some situations. Fertilizer and pesticide techniques included in other sections of Appendix A (e.g., section 3, agriculture/crops) were not repeated in the forestry techniques section. Many of them still apply, however. In the final EIS, technique 8.4 includes references to other appropriate chemical management techniques, and the title of the technique has been changed to "Appropriate Chemical Usage in SMA."

Comment

BS-1 Is anything being done, or can anything be done, about the cyanide leaching that is affecting watersheds?

Response: A mining reclamation techniques section (section 11) has been added to Appendix A in the final EIS, and discussions on mining have been added to Chapter 4.

Comment

LW-10 Section 8.2: The worst action to take is to completely prohibit any harvesting within a SMA. Proper harvest planning and TIMING can improve the condition and health of the riparian vegetation. Total prohibition of harvesting is nothing more than a CYA technique. The problem you have in Washington on private timber land is poor administration of the Washington Forest Practices Act.

Response: Section 8.2 generally does not prohibit harvesting within a SMA or change forest management objectives for a particular site. Appendix A to the final EIS has been modified to clarify the use of BMPs to avoid, minimize, reduce, or rectify disturbances while operating within a SMA.

Comment

YK-4 Alternatives to tensiometers. → Soil moisture monitoring

Response: Technique 4.3 of Appendix A has been modified to clarify that soil moisture monitoring is an appropriate practice for identifying irrigation needs.

Comment

LW-11 Your EIS does not mention snag management or snag recruitment techniques.

Response: Snags, or standing dead trees, are considered terrestrial ecosystem features that primarily benefit wildlife. Once they fall in and near streams, they become aquatic habitat features typically called large woody debris. Large woody debris was not addressed specifically in the draft EIS, but was referenced in or as an objective of Techniques 2.1, 8.1, 8.5, 8.7, and 8.13 in Appendix A. A new technique directly addressing large woody debris has been included in Appendix A, Section 2, in the final EIS; Table 2-1 in the EIS reflects those changes.

Comment

LW-12 Section 8.15: Properly planned and executed timber harvest can increase the snow pack, while maintaining and enhancing productivity. The problem is that the technique most effective (small 1-2 acre clearcuts that are properly oriented) is also controversial or at least not politically correct or palatable. You can also reintroduce several timber species with this technique.

Response: The drawback list for this technique has been revised in Appendix A to the final EIS to indicate that the method may be controversial, would require relatively large areas to generate significant results, and would require changes in the silviculture and rotation of the managed stands.

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Comment

YK-3 Other water management technique - non-irrigation. Frost protection (Spring) Evaporative cooling (late Summer) > usage of water

Response: We would need more information to address this comment or address the technique(s) that appear to be referenced.

Comment

YK-6 Add acquisition of key habitats as a measure.

BS-2 Add land acquisition/conservation easements for key riparian and upland habitats.

Response: A technique for the acquisition for sensitive riparian habitat has been added to Appendix A, Section 2, in the final EIS.

Comment

YK-7 Good list of agricultural management techniques for irrigation.

YK-8 Agricultural management - encourage on-farm sedimentation reduction projects.

YK-9 Rehabilitate and restore agricultural return drains., e.g., Marian Drain

SP-9 Would like to see bank stabilization/vegetation projects.

Response: These techniques are included in those presented in sections 3, 4, and 1 of Appendix A in the draft and final EISs.

Comment

13-03 [Reference: Tucannon River] Project managers should focus on large pool habitat improvements [here]. A second analysis of the river indicated that water temperatures exceed the preferred range for salmonids. To decrease water temperatures, tree planting and riparian protection has been prioritized. Dormant stock plantings are hard to establish in rip rap or river cobbles, and rodents prefer them as food. Project sponsors should be encouraged to develop techniques to plant rooted-stock at construction (it's easier to excavate a hole while the equipment is on site than to try to establish dormant plants with hand tools) and to protect them from beavers. This requirement should be included in the Watershed Management Program; project managers must implement such a planting strategy in their proposal for BPA funding. Environmental impacts are much greater after construction if revegetation is not successful.

Steve Martin
WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife

Response: We agree with your revegetation experience. Technique 2.1 (Appendix A) has been modified in the final EIS to consider the use of rooted stock, planting instead of seeding during project implementation, and protection of plantings from animal

damage. Your site-specific comments on the Tucannon River watershed have been passed on to BPA Watershed Management Program personnel.

Comment

18-03

Some of the in-channel modifications and techniques [described as conservation and rehabilitation actions in the DEIS] are technological fixes that are inappropriate in critical habitat, unless rehabilitating natural processes or natural features is not possible. Because they are often inappropriate and counterproductive, in-channel structures and modifications should only be used when other techniques fail. [Cites several sources for assertion; see letter.] Some concerns are:

- Grade structures completely disrupt the natural bedload movement essential for developing normal pool/riffle complexes and allowing lateral channel movement [citations];
- woody debris installation typically fails (or has unintended consequences), and is not a substitute for natural debris recruitment [citation];
- “other habitat complexity structures” - it is not clear what these would be, but artificial structures should be used only as a last resort;
- structural bank protection disrupts normal channel migration and often inhibits development of vegetative cover; and
- debris removal should be contemplated with extreme caution as it is rarely an appropriate rehabilitative action.

*Elizabeth Holmes Garr
Director, Habitat Conservation Program
National Marine Fisheries Service*

Response: These various techniques with which you are concerned are included because each is felt to have potential in restoring fish habitat under the Watershed Management Program. For example, fish habitat in one stream may be maintained through the construction of grade control structures or check dams in a gullying tributary channel. We agree that these techniques are not necessarily preferred over the restoration of natural fluvial processes and features, especially in areas designated as critical habitat. However, given the frequent, complex constraints of multiple management objectives by numerous landowners, the techniques can be effective tools or “technological fixes.” DEIS techniques 1.1, 1.8, 1.9, and 1.10 (now 1.1, 1.9, 1.10, and 1.11 in the FEIS) have been modified to clarify their use. A new technique, Restoration of Channelized River and Stream Reaches, has been inserted as technique 1.3 in Appendix A of the final EIS.

Comment

16-10 Projects should not assume static land use. The DEIS characterizes the environment as rural and sparsely populated. This is not necessarily true for most basins in the lower watershed. Conversion of forest and agricultural lands to rural residential or suburban and urban land uses is occurring rapidly in Washington, putting inordinate pressure on fish and wildlife resources and perhaps limiting the long-term success of habitat projects. Low intensity land use has been found to be a fundamentally sound and successful method for protecting fish and wildlife habitat.

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Technique 9.1 has been modified to clarify the concept that zoning for low-intensity land uses, including zoning in rural areas during community development, can be a successful method for protecting fish and wildlife habitat. Also, section 9 in Appendix A has been renamed *Community Development and Management Techniques*, to correct for the emphasis on urban areas.

Comment

16-12 Re: Management techniques (Table 2-1 and Appendix A) There should be some room for adjustment or addition to the list of techniques, regardless of alternative selected. The list could use some additional or region-specific techniques for instance. Example: Restoration of channelized reaches, dike removal or set backs should be included under In-channel modifications and habitat improvement techniques. [See letter for other suggestions.] Perhaps early in the implementation phase, this list could be customized to more closely fit our region.

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Modifications to techniques through adaptive management has been built into the planning process for all action alternatives. Techniques could be added to the list under all alternatives, but would need additional NEPA review. Also, please see responses to comments 05-07, YK-10, and 18-03 in this section on techniques. Regarding stream-crossing structures: these are included in Appendix A under section 1, In-channel Modifications, rather than in section 7, Road Management Techniques. DEIS technique 1.12 (now 1.13) has been modified per your suggestion.

Comment

16-18 Table 2-1: The Council's Wildlife Program is habitat based and so are the Basin's wildlife mitigation projects. The Wildlife EIS included a table similar to this one. Since the Wildlife Program uses habitat techniques for riparian, wetland, agriculture, grazing, road management, forest management, and recreation management, are the techniques and use frequency consistent with those identified in the Wildlife EIS?

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Please see response to comment LB-32, page CR/66.

Comment

YK-14 Add off-road vehicle (ORV) controls for stream crossings and trail erosion.

Response: A technique for the management of ORVs near sensitive riparian habitat has been added to Appendix A, Section 2, in the final EIS, and is reflected in Table 2-1 in the main text.

Comment

KL-5 Concern about augmenting peak flows through forest practices (App. A, Sect. 8.16). Believes there are studies that show that this is a detriment - not a benefit. Does this mean forest harvest could be funded because it would clean gravels?

Response: DEIS Technique 8.16, Increase Peak Flows for Gravel Flushing, has been removed from the Forest Management section of Appendix A (and the remaining forest management techniques have been renumbered).

FUNDING/PRIORITIES

Comments

03-05 The concept of a future condition that is self-sustaining should be an accepted dictate in granting money for any kind of a project. Periodic checking should be an accepted provision.

Roberta Bates

LW-3 Alternative 4 - Be careful—you don't necessarily want the cheapest technique, but the technique or project that will give you the best value. The two are not always the same. Spend your money wisely, not frugally. [Also see **Alternatives**]

YK-20 How do you prioritize projects? If money is spread too thin, will have little to show for it.

Response: Selecting and prioritizing projects in the current watershed programs is based upon meeting a set of defined goals and objectives developed by the watershed councils. Projects to meet these goals are evaluated, first on a set of biological criteria, and second on social, economic and other criteria. This evaluation is usually carried out by a combination of reviews by a technical group and then by the watershed councils. Projects may not always be put in areas of highest need. This is a *voluntary* program, based on the willingness of the landowner to work on his or her property. Levels of funding are not always adequate to meet all of the needs. Overall prioritization within the region is based on the same criteria. Regarding Alternative 4: it is specifically designed to give the same results in the long-term, i.e. fish habitat recovery, but results may be over a longer period of time. Ultimate quality would not be sacrificed, but cost-conscious application of projects would be a dominant criterion. Please see also the responses to various comments under **Watershed Approach** (pages CR/16-23).

Comment

SP-19 Need stable program—long-term—that outlives political changes.

Response: Effective long-term watershed planning and implementing do require a long-term commitment of funding and participation. Many of the watershed processes will require long-term efforts to restore proper functioning condition to insure fish habitat productivity. BPA has a funding budget specified through fiscal year 2001. The region and BPA will explore ways to budget fish and wildlife after 2001. At the present time, however, fish, and wildlife project funding is accomplished on a yearly basis by the Council and the Columbia Basin Fish and Wildlife Authority. Watershed projects could receive long-term funding if they continue to meet their long-term goals in a cost-effective manner and have the continued support of the fish and wildlife managers and other watershed participants.

Comment

16-01 Regarding habitat modification projects, monies should be set aside for evaluation of the projects' effectiveness in meeting program objectives.

*Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: All projects are required to have a monitoring and evaluation (M&E) plan. Project implementation funds may be used to conduct this monitoring beyond the initial implementation monitoring. In addition, the Northwest Power Planning Council is developing programmatic level M&E guidelines for the entire region. Please see also comments under **Watershed Approach**.

Comment

16-11 Re: relationship between this program and wildlife mitigation program. We understand watershed projects will be funded out of the anadromous fish budget. Will BPA be given Habitat Unit credits for wildlife benefits [under benefits expected for Alt. 6]? Relationship between this funding process and wildlife funding is unclear. Concerns have been expressed in the Wildlife Caucus that the wildlife part of BPA's budget may be expected to provide funding for wildlife benefits and that BPA would receive mitigation credit for watershed projects. [The Caucus has developed a 5-year budget, goals, etc but has not received funding.] Will funding for wildlife benefits under this program affect the Wildlife Caucus budget? How will cost sharing between the Fish Caucus and Wildlife Caucus be determined? The Northwest Power Planning Council and BPA require some kind of permanence associated with wildlife mitigation projects. Does the Watershed Program have a similar requirement? What steps have been taken by the Watershed Program to ensure consistency with the Council's Wildlife Program?

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: This EIS is not intended to answer questions of funding or crediting in relation to the wildlife portion of the Council's Fish and Wildlife Program. This comment has been forwarded to the Council.

Comments

- SL-2 Is more money going to be available for watershed planning in other watersheds? When?
- LB-24 What types of projects would BPA fund? How would projects be identified? [See also **Miscellaneous.**]
- 06-06** [Commenter is a USFS district hydrologist in Libby, MT] [The USFS] would be interested in using some of these funds to implement restoration projects.
- Steve Wegner*
- SP-7 How much funding is available for watershed work?
- SP-8 That's not much money for the amount of work that needs to be done.
- SP-18 Is the watershed program funded year-to-year? Budgeted by BPA, not NPPC?

Response: The process of selecting and prioritizing projects is conducted on a yearly basis by the Council. BPA, in cooperation with other Federal agencies, has established an overall budget available for funding fish and wildlife projects. BPA negotiates funding agreements with project sponsors after receiving final recommendations

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from the Council. Project types are identified to meet a specific need in the Council's 1994 Fish and Wildlife Program, or from specific watershed plans such as the Model Watersheds. The overall level of funding for the watershed programs will be recommended by the Council; funding may vary up or down in any given funding cycle.

Comments

LG-7 Concern that "balanced" approach gives equal weight to cost, other environmental resources, and fish mitigation. Fish mitigation should have a priority. [Also see **Alternatives.**]

YK-16 A wide range of techniques and publics should be funded as long as the benefits accrue directly or indirectly to fish. [Also see **Techniques.**]

Response: Alternative 6 does give a balanced approach to cost, environmental resources, and aquatic habitat objectives. However, fish habitat improvement would be recognized as the project priority. Alternative 6 represents the current reality of implementing projects *voluntarily* on private lands. BPA is not a regulatory agency. Neither does BPA have an unlimited pool of funds available for watershed mitigation. In FY97, funding requests were double the available amount of funds. Cost-share opportunities are also a useful means to promote watershed health and open up new mitigation opportunities.

All watershed projects must have a direct measurable benefit to fish habitat productivity. That will always be the bottom line for watershed project funding. This EIS considers a watershed-based approach to the mitigation and restoration of lost fish habitat. This includes a variety of in-stream, riparian, and upland practices that may be useful in implementing a variety of improvement projects. The standardized planning process common to all action alternatives provides for identification of degraded conditions, improvement needs, and restoration options on either a project or watershed basis, and requires the involvement of as many stakeholders as possible, including private landowners.

Comment

17-03 The FEIS should limit the use of "hard to get" fish money. Programs for agriculture and urban problems usually are adequately financed, and BPA's Water Program should avoid linkages to those types of aid programs. The FEIS needs to emphasize aquatic habitat improvement projects.

*Preston A. Sleeper
Acting Regional Environmental Coordinator
U.S. Department of the Interior*

Response: The EIS is not intended to prioritize funding for watershed projects. See the responses to comments SL-2, LB-24, 06-06, SP-7, SP-8, and SP-18 for a description of the funding prioritization process; and the response to LG-7 and YK-16 regarding the emphasis on aquatic habitat improvement.

Comments

- LW-16 Money should go to on-the-ground projects. Habitat work you do for anadromous fish should also benefit instream wildlife. Make sure wildlife and fish projects are coordinated - carry wildlife projects into the stream.
- SP-21 Realistically, what percentage of money for the watershed program will actually get spent on the ground?
- SP-22 Concern that most of money goes toward planning and very little actually gets implemented, e.g., county conservation districts.

Response: Indirect benefits to other wildlife, and to non-game or non-native fish and wildlife, are often weighed as part of the project selection. Many of the projects that deal with restoration of function of a riparian or floodplain system will have benefits beyond those for the intended target species. In some cases, both fisheries and wildlife funds are combined for land acquisition that will benefit both. The amount of funds that go directly to the ground within the current Model Watershed programs is about 75% to 80% of the total budgets. The other 20% to 25% is used to develop, design and implement the project, a necessary part of the process. In the first one-to-two years of a watershed program, a bulk of the funds may be used for planning and assessment. These funds are also a necessary part of the process to develop the road map for ensuing years.

Comment

- 13-01** The Washington Department of Fish and Wildlife (WDFW) supports the concept of the Model Watershed Program. . . . We encourage the BPA to adopt a set of policies and procedures that address the following deficiencies in the model watershed program to ensure that public monies are used effectively to enhance fish resources in the northwest. [Related comments appear under appropriate topic headings.]

Steve Martin
WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife

Response: Thank you for your comments. See the responses to your specific comments.

Comment

- 13-02** [Reference: Tucannon River Model Watershed Program] Critical habitat areas for spring chinook salmon were identified, but numerous 1996 projects were completed in areas outside of the critical habitat [perhaps because landowners outside those areas were willing to cost share on projects that provided them bank protection]. Stable banks are important; however, actions outside the critical habitat areas provide negligible benefits to critical stocks. Perhaps instream habitat improvement projects in the critical habitat areas should be funded at 100% in

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1997 so that land owners do not have to cost share for such projects. Funding should be based on priorities for improving fish habitat in the critical habitat areas.

Steve Martin

*WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife*

Response: One of the major purposes of the Model Watershed program was to cooperate with private landowners. The decisionmaking process in the Tucannon includes a review of projects by a technical committee, of which WDFW is a member. The 1996 private-land bank stabilization projects also included specific fish habitat mitigation techniques approved by the WDFW. If the WDFW does not feel that these or future projects are being placed in critical habitat areas, this issue should be raised with the Tucannon Model watershed coordinator. Critical habitat needs on WDFW lands or on USFS lands needs to be presented to the technical and landowner steering committee. In-stream habitat projects with no clear benefit to a private landowner could be 100% funded. There would be a requirement of cost sharing if such projects were done on WDFW or USFS lands.

Comment

13-07 We support the concept of local involvement in planning and decision making encompassed in the model watershed program. We ask that BPA and committees associated with the Fish and Wildlife Program carefully evaluate all model watershed programs to ensure effective use of monies and substantial benefits to salmonids. (Also see **Public Involvement**.)

Steve Martin

*WDFW Area Habitat Biologist, Southeast Washington
Washington Department of Fish and Wildlife*

Response: Steps five through eight of the EIS eight-step planning process will provide the basis for the development, implementation, monitoring, and possible changing of watershed projects. Cost effectiveness as well as cost-versus-benefit to salmonids will always be a part of the consideration of project funding. Other factors will also be considered in Alternative 6, for a balanced approach, but clear salmonid benefits will always be a part of the analysis at the watershed, by the Council in its project review, and by BPA in the contracting process.

Comments

LG-13 Need to prioritize so that the stream itself is given priority over upland practices (e.g., noxious weed control). This can also be looked as giving Alternative 3 the priority alternative. [Also see **Other Alternatives**.]

LG-4 Would like to see money concentrated on priority basis so that results can be seen and not diluted through many small projects on scattered streams.

Response: Watershed goals and objectives are established based on the analysis of the need to maintain and improve fish habitat productivity. Environmental factors that will

ultimately affect streams and fish must be reviewed from ridge-top to ridge-top. In some cases, effects from upland management can be as or more important than in-stream factors. This is decided on at the watershed level by local technical team analysis. The areas with highest biological need may not always receive treatment first, because the BPA-funded watershed projects are done on a voluntary basis. It is ultimately the goal to treat all high priority areas by showing the benefits of good land management to non participants.

Comments

- SP-24 Cost sharing helps in getting projects funded. [See also **Coordination.**]
- SP-27 How do fish and wildlife groups, e.g., Trout Unlimited, get funded for watershed enhancement projects? Can use their memberships to magnify benefits - free labor, monitoring. [See also **Coordination.**]
- LB-25 How will all the different watershed groups being formed be coordinated? Some are funded by state, some by BPA, others? [See also **Coordination.**]
- YK-18 Concern for "partnerships" regarding the funding for watershed projects approved by the Northwest Power Planning Council. [See also **Coordination.**]

Response: Cost sharing and forming partnership has been and will be a consistent goal of BPA-funded watershed programs. The current Model Watersheds have had a cost share rate of 25% to 50% on almost all projects. The Council has established a minimum cost-share level of 10% for all watershed projects that have a benefit to other landowners. All project proponents have to submit their project proposals annually to the Council, through BPA, for consideration in the prioritization process. Names and addresses for future project solicitations can be submitted to BPA at any time.

Comments

- LG-9 Tribes would like funding to do ethnographic/oral history consultation for cultural resources. [Also see **Environmental Impacts.**]

Response: All cultural resource surveys—whether on-the-ground for project review or for ethnographic/oral history surveys—will be conducted if the watershed project could affect the character or use of historic properties. Funds for the watershed project would include funding for any legally required culture resource compliance. See also FEIS section 4.6.4 regarding Programmatic Agreements for Cultural Resources.

Comments

- LB-17 Operations for one species are constraining to other species' needs (e.g., drawdowns for salmon affect resident species in reservoirs).
- LB-23 What are the considerations for non-native fisheries? Will they be considered in the prioritization process?

LB-18 Consider multi-species management.

11-05 Please require multi-species approaches to mitigation projects: integrating the habitat needs of terrestrial and aquatic lifeforms into one comprehensive restoration/mitigation strategy. A suite of "umbrella" or "indicator" species can be protected, restored, and monitored to determine if BPA mitigation measures are as effective as projects. . . . [Single-species approaches are often reactive, and not beneficial; the commenter cites the "great salmon hatchery (and barging) debacle" that further disrupted ecological balance of all native fishes, including the target species.] BPA funded projects should ensure that projects designed to benefit one targeted species does not succeed at the expense of other species living in the same ecosystem.

Steve Kelly and Mike Bader

Friends of the Wild Swan, Inc./Alliance for the Wild Rockies, Inc.

Response: Operations of the mainstem Federal reservoirs are not considered in this EIS, but are considered in the System Operations Review (SOR) EIS (see FEIS section 1.5.2). Within planning for a specific watershed, goals may or may not be set for non-native fish stocks. This depends on many factors and on the overall fish production goals set by the fish management agencies, i.e. the states and tribes. Non-native fish projects can be submitted to the Council in its yearly project prioritization process. They will receive consideration based on the overall selection criteria and how they relate to the Council's overall 1994 Fish and Wildlife Program. The scope of many of the watershed plans has been to focus on one or more native anadromous or resident species. Potential adverse effects on other species are considered as part of the biological criteria in project prioritization. The types of watershed projects have generally been such that they are not species-specific in their effects, but rather designed to restore some stream, riparian, floodplain or upland watershed function that will benefit all fish and wildlife using this area. These watershed projects are also often limited in scope due to limited funding for planning and implementation. This is overcome to some extent by the interagency cooperation developed by the watershed planning efforts.

ENVIRONMENTAL IMPACTS

Socioeconomics

Comments

SL-7 The Idaho governor's comment statement on the listing of steelhead on the threatened and endangered species list asked for an economic loss inventory (p. 42). We believe you should also consider economic loss mitigation in this EIS. The dams impacted the salmon, which in turn affected one of our livelihoods—fishing. When the salmon were listed, we were impacted even more. The timber industry was affected, and that, in turn, resulted in the shutdown of our mill. Therefore, your watershed mitigation efforts should address these economic losses.

SL-4 Forest (timber cutting) funds to schools have also been cut due to the listing of the salmon.

Response: Economic effects of previous and unconnected actions, such as over-fishing and timber harvest, are outside the scope of this EIS. The purpose of this EIS is to streamline the funding and implementation process for projects that mitigate for fish habitat lost during the development of the Federal Columbia River Power System. Economic impacts addressed in it are those associated with the implementation of mitigation projects under various alternative funding guidelines. As summarized in Table 2-2 of the Draft (and Final) EIS, effects of most alternatives result in minor to moderate, short-term economic benefits associated with employment during project implementation.

Comments

04-05 *Other environmental resources you should consider:* Farming, logging, camping and/or recreational use. Commercial ocean fishing! They all have benefited so they all should help restore. [Study these] not what will happen to them, but what they have done to the ecosystem. Turn the table when they start to whine about something.

Mike Keppler

Response: Various techniques that may be used to address restoration needs in agricultural, forested, and recreational areas are included in this EIS (Appendix A: Sections 3, 4, 5, 6, 8, and 10). This EIS concentrates on the mitigation and restoration of fish habitat lost during the development of the Columbia River. Commercial ocean fishing and other influences on fish populations, such as hatcheries and fish stocking efforts, are outside the scope of this EIS.

Comments

03-06 Page 2/23: Section 2.1.7, Description of Alternative 6: The phrase “. . . and to avoid adverse impacts on land use, local economies related to the environment [emphasis added]” should be eliminated or more precisely explained. It is too broad and could be a loophole for unwanted but necessary restructuring.

Roberta Bates

Response: The referenced sentence has been modified to explain that project managers will apply watershed mitigation measures in a manner that avoids or reduces adverse impacts on local economies dependent on agriculture, forestry, and recreation. BPA has no authority to fund measures to compensate for the impacts of fish mitigation on local economies.

Comments

04-06 [The EIS should] stop being concerned with impacts to man and commercial use and look at strictly Nature’s need for free flowing unmanipulated use of the water ways and adjacent lands. [Ref: Alt. 5] [Also see **Alternatives**.]

Mike Keppler

Response: NEPA, the authority which directs EIS protocol, requires that the impacts of land management activities be assessed for both the natural and human environments.

Comment

YK-1 Social/Economic Effects: Look at the USFS Eastside EIS for information to use in the Watershed EIS. Also, consider other analysis; i.e., fish/wildlife, landscape, etc.

Response: A draft Forest Service report on population, employment, and income patterns in the interior Columbia River Basin was the basis used to characterize socio-economic conditions in this EIS (reference McGinnis and Christensen, 1994, in the Draft and Final EISs).

Comment

YK-2 Keep Social and Economic separate!

Response: NEPA does not designate any specific format for addressing social and economic issues. However, the EIS was developed in accord with commonly used standards for socioeconomic issues.

Comments

YK-17 Make sure social and economic considerations are covered.

MS-5 Sociological analysis. Even a qualitative analysis on aspects of how different local population segments view natural resource(s) management should be included.

Response: Social and economic considerations were addressed in sections 3.9 and 4.7 of the draft EIS. Based on the project goals and scope of this EIS, a sociological analysis would likely have no effect on how natural resources are managed overall.

Comment

MS-4 On-site interpretation programs are important to watershed programs. Coordinate with other agencies, i.e. Montana [Department of Natural Resources]. Work with common interpretive goals, e.g., the why vs. don't do it. USFS Lake Koocanusa a scenic byway interpretive plan is an example. [Also see **Coordination.**]

Response: On-site interpretation programs have not been a significant part of the watershed program. There are examples of information signs at projects and of education seminars and classes developed by the watershed groups. These have been directly related to projects on the ground for a hands-on basis of referral. There will continue to be small-scale interpretive efforts involved with many of the projects. Agency cooperation within a watershed, on a watershed council or technical advisory level, will generally lead to the development of this sort of cooperative effort. Any large-scale interpretive sites would likely have to be proposed as separate projects within the yearly prioritization process. Interpretive programs are included under Technique 10.4, Outdoors Education Programs, in Appendix A.

Comment

16-13 All alternatives: there should be more discussion of the positive aspects of watershed integrity on human health and safety. Example: land use zoning that restricts development on floodplains generally results in less flood impacts to structures. Watershed treatments that facilitate natural hydrology result in available water for other uses. Land use practices that reduce unnatural sedimentation may avoid the need for expensive treatment of domestic water supplies.

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Your comments have been noted and used to modify FEIS sections 4.1.3, 4.2.3, and 4.5.3.

Fish and Wildlife

Comments

- LB-16 How many species will have to be mitigated for, i.e., bull trout.
- KL-6 Concerned about impacts to resident fish—don't restore anadromous fish at the expense of resident fish.
- LB-22 Why is there no special consideration for the Blue Ribbon Resident Trout Stream on the Columbia System?
- MS-6 What would be the impact of the watershed program on overall salmon/fish populations? How much of an increase could be expected?
- SL-5 Bull trout will wipe out salmon and steelhead smolts if they are protected because the populations will be out of balance.
- 14-03** We are not only concerned with anadromous fisheries, but the often overlooked inland native fish are also in trouble. The bull trout, redband trout and westslope cutthroat trout are in decline leading towards extinction if immediate action is not taken soon. This should be brought out in the EIS so that the necessary watershed management activities are developed rapidly and more are completed sooner than later.

*Robert Ament
Resource Specialist, American Wildlands*

Response: The focus of the Watershed Management Program and the purpose of this EIS is the restoration of fish and aquatic *habitat*. Species-specific management techniques, including the funding of hatchery and stocking programs that might favor one or more species, are not within the scope of this EIS. Populations listed under the Endangered Species Act and other sensitive species identified by cooperating agencies would receive protection by being identified early in the planning process under all action alternatives (planning step 1 under section 2.1.3 in the draft EIS); however, no specific species/populations would be targeted at the expense of other populations.

It is possible that, in stream reaches/habitats in one watershed or across the Columbia River Basin, more habitat restoration projects could be approved that are preferred by one species over others. For example, more projects in fast-water habitats than slower riffles, slack water areas, and pools may favor steelhead or bull trout over rearing coho salmon. BPA would determine the funding and subsequent distribution of projects after a review of the planning processes behind each of the projects submitted for funding. In making its determinations, BPA would probably initially rely more heavily on the number of stakeholders involved in the planning process, the characterization of present and desired conditions and trends, and the justification behind project goals and actions plans (planning steps 2 through 6 under section 2.1.1 in the draft EIS). With time, BPA would shift its

review to consider more monitoring results and adaptive management ideas (planning steps 7 and 8).

Consideration of high-quality aquatic habitats, such as blue-ribbon trout streams, and their recognition as refugia are considered in the planning process in Alternative 3 (Section 2.1.4, steps 1 and 5) and Alternative 6 (Section 2.1.7, steps 1 and 5). The overall effect of the watershed program is expected to be an increase in the quantity and quality of various fish habitats and in water quality in project areas. Whether fish populations increase proportionally to increases in habitat depend on the limiting factors affecting the population. Genetics, fishing pressure, predators, and access to related habitats are just a few factors that may limit the growth and health of fish populations more than overall habitat quantity and quality.

Comment

19-05 Eliminate "wildlife harvest" as a management technique. If forage is lacking, it makes more sense to reduce cattle grazing and restore areas degraded by human alterations of the ecosystem than to eliminate wildlife. Compared to the effects of cattle grazing and other human-induced alterations to the ecosystem, wildlife have little impact and are a natural, integral component of the system. (See also **Techniques.**)

*Richard B. Parkin,
Manager, Geographic Implementation Unit
US EPA*

Response: This technique will be retained as a possible, though infrequently used, management tool. A watershed analysis will indicate whether livestock grazing controls are needed for vegetation management. It may be possible that, even after livestock management controls, wildlife are still a part of the problem. This technique would be used only after a thorough analysis of all alternatives, but should be retained as one of the tools.

Comment

16-19 Page 3/49: Wildlife discussion and preceding map: Wildlife mitigation projects use a well-established standard habitat classification scheme (cover typing). To ensure consistency, the same system should be used for Watershed Management projects. [Commenter notes types of habitat— more than the three types mentioned in this EIS.]

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

16-22 Appendix A: Are the effects identified consistent with those identified in the Wildlife Mitigation EIS?

Response: The Watershed Management Program EIS addresses the funding and implementation of fish habitat and watershed restoration projects at a programmatic scale. The Affected Environment chapter intends to paint only a broad picture of wildlife habitat in the Columbia River Basin landscape where these projects are to be implemented. Though the techniques in this EIS and in the Wildlife Mitigation Program EIS may share similar titles, many are not identical between EISs, so one-to-one comparisons are not possible. The use of wildlife cover typing information may be valuable on a watershed-specific basis, however.

Comment

15-03 Re: Table 2-2 [compares environmental consequences of alternatives]. It is hard to compare the alternatives because language is not parallel across the comparisons. Example: Fish/Water Resource and Quality. Alt. 1 says it may cause temporary exceedences of state water quality (sediment) standards via construction disturbance. But Alt. 6 states that short-term, construction-related impacts are mitigated to the extent practicable. Would such impacts also be mitigated to the extent practicable under Alt. 1? Similarly: Alt. 1 would benefit fish and water quality as aquatic and riparian habitat is restored/protected. Alt. 6 states that moderate improvements in fish and riparian habitat would result, including immediate and sustained benefits to fish. Would this same language apply to Alt. 1?

Candace Thomas
Chief, Environmental Analysis Branch, U.S. Army Corps of Engineers

15-04 Chapter 4 begins with a statement that the primary objective of the program is to increase and sustain anadromous and resident fish populations by increasing the amount of high quality habitat available to these populations. Sec. 4.2.2 states that Alt. 1 would benefit these resources overall because of mitigation and restoration projects, and that State water regulations would be followed under all alternatives, so no significant impacts are expected. This section does not support the statement made in table 2-2 [see comment 15-03]. Are significant beneficial impacts expected? Will high quality habitat become available to anadromous/resident fish?

(con't)

It is stated that Alt. 6 would increase fish habitat and water quality at new mitigation sites over the long term as the diversity of in-stream habitats increases and as riparian habitat establishes and expands, and that no significant long-term impacts are expected. Again, this section does not support the statement made in Table 2-2. Will high quality habitat become available to anadromous/resident fish? Are significant short-term impacts expected?

Candace Thomas
Chief, Environmental Analysis Branch, U.S. Army Corps of Engineers

Response: Alternatives 1 and 6 will both have mitigation of effects and similar expected benefits. Temporary exceedance of water quality will occur and be allowed only if the effects are short-term in nature and are permitted by the appropriate state regulatory agency. No adverse long-term effects on water quality, or reduction in benefits, will occur. The primary difference between Alternative 1 (No Action) and Alternative 6 is that, under Alternative 6, (1) BPA would establish a standard planning process and (2) project managers would apply program-wide mitigation measures, as appropriate, to protect the environment.

Water

Comment

LB-20 Overall river health should be considered.

Response: Action Alternatives 3, 5, and 6 incorporate watershed as well as reach-scale information in characterizing proposed project areas, which becomes the basis for developing and refining project goals (planning step 4 under sections 2.1.4, 2.1.6, and 2.1.7, respectively).

Comment

MS-7 Impacts of development on watersheds, especially small parcel owners removing riparian vegetation along streams.

Response: This EIS addressed the impacts of restoration and mitigation projects, not the impacts of unrelated land developments. Some land use techniques, such as planning and zoning in floodplains and riparian areas (Appendix A sections 9.1 and 9.7) may affect development in urban areas. Also, please see the response to comment 06-04 under the **Techniques** section of these responses.

Comment

SP-15 How would this program affect or be affected by the lead contamination in Coeur d'Alene coming into the Spokane? Flooding makes this worse.

Response: A watershed planning process set up under this EIS would need to consider this contamination. If it were identified as a priority project, had willing landowner cooperation, and were not being funded under other programs, clean-up or

restoration of the contaminated area could be considered for funding by BPA through the Council's prioritization process. A mining reclamation techniques section has been added to Appendix A in the final EIS.

Cultural Resources

Comment

LG-8 Use CRMP process to get broad-based overview of cultural resources on each smaller watershed - protect confidentiality by identifying as "sensitive sites."

Response: All action alternatives include provision for identifying the presence of historic and archeological resources during the planning process—well before any ground-disturbing activity in the area of concern for proposed projects (planning step number 1 under section 2.1.3 in the draft EIS).

Comment

16-20 Pages 3/50 and 4/119. Cultural Resources. Does Watershed Program have similar requirement to wildlife mitigation projects for cultural resource survey before ground-breaking activity? What program-wide measures would help protect cultural resources?

*Cyrcis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Yes, requirements are similar between the two programs, including consultation with SHPOs, tribes, and others, and surveys where cultural resources may be adversely affected. See the program-wide mitigation measures for cultural and historic resources in section 4.6.4 of the draft or final EIS.

Comment

LW-13 Reference Tribal treaty and statutes, as well as Tribal rights in EIS/ 1855 Treaty and Statutes (CRITFC Tribes); Executive Orders for Executive order Tribes (P. 94, under all Alternatives; p.11. [Also see **THE EIS.**]

Response: Thank you for your comment. Tribal treaty rights have been addressed under section 4.6.1 of the FEIS. Please also see response to comment TR-3, below, page CR/63.

Comment

LG-9 Tribes would like funding to do ethnographic/oral history consultation for cultural resources. [Also see **Funding.**]

Response: Please see response to this comment under the **Funding** section, page CR/53.

The following comments (TR-1 - 4) were submitted orally by the Shoshone-Bannock, Shoshone-Paiute, and Umatilla tribes in conversation with environmental specialists at BPA.

Comment

TR-1 Section 4.6.1: The section providing legal context for cultural resources impacts makes no mention of legal rights accruing to Tribes.

*Shoshone-Bannock tribal representatives
Shoshone-Paiute tribal representatives*

Response: We have amended this section by adding language (already present in Chapter 3), describing the Native American tribes' legal rights to activities and resources.

Comment

TR-2 Section 4.6.1: This section seems to focus on the minimum requirements for compliance. We would like to see BPA take a more pro-active stance in anticipating cultural resource impacts and preventing damage.

*Shoshone-Bannock tribal representatives
Shoshone-Paiute tribal representatives*

Response: You are correct. The focus of the "Legal" section is strictly on basic requirements. We have amended this section to include additional language referencing Native American legal rights (see comment TR-1). BPA does intend to follow a more pro-active path regarding cultural resource impacts: the specific steps are documented in section 4.6.4, which focuses on the program-wide mitigation measures and on the vehicle of Programmatic Agreements with SHPOs and affected tribes to ensure consultation, documentation, development of cultural resource management plans (as appropriate), and active steps to educate the public.

Comment

TR-3 Section 3.8: This section seems very limited in detail; far more information is available and would be appropriate to document the nature and extent of cultural resources in the watersheds of the Columbia River.

Umatilla tribal representatives

Response: We recognize that there is information about the rich cultural history of the Pacific Northwest tribes than is contained in the DEIS. The summary of that history in the DEIS was not intended to minimize its importance but reflects our view of the role of a programmatic EIS such as this. In this programmatic EIS, we have established a framework for looking at activities in the model watershed program and have only briefly described the potentially affected resources, including cultural resources. If a specific project is proposed and cultural resources are present, BPA will determine, in conjunction with the interested tribe or tribes, how cultural resources in the project area might be affected by the associated activity.

In the DEIS, we have referenced cultural resources information, including Tribal statements, reports, and testimony, which may be found in Appendix D of the System Operations Review EIS. While these materials do not cover all of the area included in the model watershed program, they do provide valuable information on cultural resources near the Columbia River and how we can work with the Tribes to protect those resources. Much of the information in Appendix D was provided by the Confederated Tribes of the Umatilla Indian Reservation (CTUIR).

While we appreciate the CTUIR's concerns regarding the coverage of cultural resource in the DEIS, we believe that the coverage is sufficient for purposes of a programmatic EIS. This approach conforms with regulations of the Council on Environmental Quality, including 40 CFR 1502.2, 1508.28, and 1500.1.

Comment

TR-4 The site-specific cultural resource surveys referenced are too limited. BPA should carry out watershed-wide cultural resource surveys.

Umatilla tribal representatives

Response: BPA is committed to identifying potential cultural resources that might be damaged by individual BPA-funded watershed projects. We recognize that such resources are important and require due consideration and protection. However, it is not appropriate for BPA to carry out such surveys on a watershed-wide basis because BPA funding of watershed projects does not give BPA control of whole watersheds. Please see also the response to comment TR-3, above.

THE EIS: STRUCTURE, ANALYSIS, RESULTS

Comment

12-01 The DEIS addresses a portion of the program that is very important to the [Northwest Power Planning] Council. Improvement of fish and wildlife habitat using an ecological approach is vital to rebuilding these populations. We believe that implementation of projects by local subbasin interests is one of the most effective ways to meet this need. The draft EIS should add efficiency and effectiveness to this program by fully addressing the requirements of the National Environmental Policy Act in a simpler more coordinated method. Our review of the draft EIS found it to be well done, generally.

*John Etchart
Chairman
Northwest Power Planning Council*

14-01 We appreciate BPA's efforts to look at the issue of the Power System's future management actions in the Columbia River Basin as a programmatic whole rather than ad hoc piecemeal site-specific projects.

*Robert Ament
Resource Specialist, American Wildlands*

16-05 Maintaining and restoring watershed functions necessary to sustain fish and wildlife resources is a daunting task, and we applaud your efforts to standardize a planning and implementation approach for watershed projects funded in whole or in part by BPA.

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Thank you for your comments.

Comment

19-01 Based on a limited review [of the EIS], we do not foresee having environmental objections. However, we do wish to submit the enclosed comments. (See other **19-** comments.)

*Richard B. Parkin,
Manager, Geographic Implementation Unit
US EPA*

Response: Thank you for your comment. Please see also responses to other **19-** comments.

Comment

LW-13 Reference Tribal treaty and statutes, as well as Tribal rights in EIS/ 1855 Treaty and Statutes (CRITFC Tribes); Executive Orders for Executive order Tribes (P. 94, under all Alternatives; p.11. [Also see **Impacts/Cultural Resources.**]

Response: Thank you for your comment. BPA addresses tribal rights in section 4.6.1 of the FEIS. Also see response to comment TR-3, at page CR/63

Comment

YK-11 Need to add comprehensive storm water and sewer planning. Need an area discussing overall planning.

Response: Storm water and sewer planning are addressed in the appendix on techniques (Appendix A). See Techniques sections 9.2, 9.3, and 9.4.

Comment

YK-12 Comprehensive permitting of animal waste facilities; i.e., Clean Water Act (state rules and regulations).

Response: Animal waste management is addressed in Appendix A, section 5. See especially section 5.3 on waste management planning.

Comment

LB-32 How is the EIS related to the Wildlife Programmatic EIS (BPA's)?

Response: As with the Watershed Management Program, BPA proposes to establish standards and guidelines for planning and implementing wildlife conservation and rehabilitation projects throughout the Columbia River Basin. Many of the Wildlife Program's techniques are similar to those for watershed mitigation, although they may have different frequencies of use. Most of the environmental impact analysis and many of the potential standards and guidelines addressed in the Watershed Management Program EIS are also included in the Wildlife Mitigation Program EIS.

Comments

LB-27 Upper Columbia River Basin scientific analysis is flawed - How much is that information going to be used in the watershed planning?

LB-33 Look at scientific assessments for the Upper Columbia River Basin EIS.

SP-12 Make sure that qualified people (biologists) do threatened and endangered species surveys.

Response: This EIS will not be *directly* coordinated with the Upper Columbia River Basin EIS (UCRB EIS). Nevertheless, we have attempted to integrate this EIS with other Federal ecosystem-type EISs by proposing to adopt the watershed-based

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project planning process developed for the US Forest Service's Ecosystem EISs. Our eight-step planning process is adapted from *The Ecosystem Approach: Healthy Ecosystems and Sustainable Economies*, a report of the Interagency Ecosystem Management Task Force, June, 1995. Note also that watershed groups will be able to use the data gathered for the UCRB analysis.

Yes, qualified people will be doing environmental analysis on threatened and endangered species.

Comments

KL-4 Difficulty in making it both specific and broad. Don't want EIS written too narrowly so that valid projects aren't covered.

SP-1 EIS is too generic.

Response: The EIS is a programmatic document specifically written to cover a broad array of projects throughout the Columbia River Basin. Site-specific review of projects that rely on this EIS will also occur; see section 1.3 of the EIS.

Comment

BS-4 Is the principle of wildlife/fish working together incorporated in EIS?

Response: Wildlife is considered in this Watershed EIS as an environmental resource. However, the Wildlife Mitigation Program Final EIS, which is similar in approach to the Watershed EIS, establishes standards and guidelines for planning and implementing wildlife conservation and rehabilitation projects throughout the Columbia River Basin.

Comment

LW-4 Define SMA.

Response: The following definition has been added to the Glossary: Streamside Management Areas: Width of the managed riparian area, as defined by applicable Federal, state, and local statutes; subject to on-site review of such factors as slope steepness, class of watersources, depth to water table, soil type, type of vegetation, and intensity of management.

Comment

06-05 I think this effort [environmental analysis] would be much better if you had a base document but then had sections of more site-specific information on the river reaches such as river basins like the Kootenai, Clarkfork, Snake, etc.

Steve Wegner

Response: Thank you for your comment. More site-specific information will be included in the watershed plans themselves. More site-specific information would be developed during the eight-step planning process proposed for Alternatives 2 - 6.

Comments

08-04 Regarding Glossary definition: Resident fish can be either resident, fluvial or adfluvial. Adfluvial and fluvial fish spawn in tributaries. Once fluvial fish become adults, they migrate to larger streams or rivers and then migrate back to tributaries to spawn. Once adfluvial fish become adults, they migrate to either lakes or reservoirs and then migrate to tributaries to spawn.

*Joseph R. Maroney
Fisheries Program Manager,
Kalispel Tribe of Indians*

08-03 Please correct references on page 3/51 and 8/135 of the DEIS to read "Kalispel Tribe" [not "Kalispel Tribe of Idaho"].

*Joseph R. Maroney
Fisheries Program Manager,
Kalispel Tribe of Indians*

Response: Thank you. These changes have been made.

Comment

14-02 Commenter recommends recently released reports for BPA to consider in developing "a meaningful Watershed Management Program." ["Integrated Scientific Assessment for the Ecosystem Management" and "Status of the Interior Columbia Basin, Scientific Findings," which indicate the aquatic condition and many of the dependent species of salmonids plus other riparian/aquatic species in serious decline.]

*Robert Ament
Resource Specialist, American Wildlands*

14-06 "Return to the River: Restoration of Salmonid Fishes in the Columbia River Ecosystem" developed by The Independent Scientific Group and funded by BPA developed a conceptual foundation for recovery efforts for salmon and steelhead, and should be incorporated into the FEIS as completely as possible.

*Robert Ament
Resource Specialist, American Wildlands*

Response: BPA will acquire copies of "Integrated Scientific Assessment for the Ecosystem Management" and "Status of the Interior Columbia Basin, Scientific Findings," for future reference. Although "Return to the River" was funded by BPA at the Council's direction, the principles of this document have not been adopted as part of the Council's Fish and Wildlife Program. "Return to the River" may contain many laudable principles of watershed management, but BPA uses the Council's Fish and Wildlife Program of 1994 as its basis of policy development for watershed actions. The development of the six alternatives within this EIS are consistent

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with the 1994 Program. If and when the Council amends that Program to include new concepts of watershed management from "Return to the River," we will review the potential to amend this EIS. See also the response to LB-31, 18-07, and LB-34 under **Process/Coordination**.

Comment

15-01 Environmental consequences of the alternatives are not presented in the summary.

*Candace Thomas
Chief, Environmental Analysis Branch, U.S. Army Corps of Engineers*

Response: CEQ regulations for implementing NEPA state what is to be included in the summary (in section 1502.12). We have included each of these items in our summary. A comparison of environmental consequences of each alternative is shown in Table 2.2.

Comment

15-02 Re: Sec. 1.7 list of issues identified during scoping. Listing is a categorization, not a detailed statement of what the issues are. For example, what specific aspects of wetlands resource management are at issue is not presented. We are interested in knowing more of the specifics of the issues regarding waters of the US, including wetlands, raised during scoping.

*Candace Thomas
Chief, Environmental Analysis Branch, U.S. Army Corps of Engineers*

Response: BPA, under CEQ regulations for implementing NEPA (Section 1500.4 on reducing paperwork), is required to reduce paperwork by reducing the length of EIS's. After scoping, BPA prepared a "For Your Information" document summarizing all of the comments received during the initial scoping period. We will provide you with a copy of this document.

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Comment

16-02 Re: Sec. 4.2.1 (1): the description of WDOE's areas of regulatory authority related to the protection, use, and management of water resources should also include: flood control, dam safety and inspection, water right permitting, and well construction.

*Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: Thank you for your comments. We have made the changes.

Comment

16-21 Ch. 6: references. To be consistent with other EIS documents BPA has prepared, this EIS should identify those EIS documents which use the same types of management techniques.

*Cyreis Schmitt
Conservation Services Division Manager, WDFW
included in: Barbara Ritchie
Environmental Review Section, Washington Department of Ecology*

Response: We agree. Changes have been made.

FIGURE 3-1

Comments

- LW-5 Figure 3-1 Check pink cropland vs. yellow-mixed.
LW-6 Palouse is marked yellow - is totally cropland.
LW-7 Okanogan, near Canadian border is pink - rangeland, not cropland.

Response: We have corrected the maps to reflect conditions accurately.

MISCELLANEOUS

Comment

LW-14 How much available anadromous fish habitat is not being used in Washington State? (Columbia River Basin)

Response This information is not available at this time. There are some studies underway, such as in the Yakima Basin, to determine this, but they are only just beginning.

Comment

LW-15 Pristine, or near pristine, habitat not being utilized indicates that it is not a habitat problem.

Response Thank you for your comment. Through the Model Watershed studies, we have found that there are habitat problems in many areas.

Comment

YK-13 Required flood insurance.

Response BPA is not a regulatory agency, and therefore cannot require people to acquire flood insurance as part of an overall watershed plan. However, BPA will consider flood insurance if asked to do so by the watershed council.

Comment

SL-3 How were the original 6 model watersheds identified? - They (especially Idaho ones) are so far upstream in the watershed. [Also see **Process**.]

Response The original model watersheds were identified through a prioritization process involving state and Federal agencies and a variety of biological and social factors, in response to Council direction. For more information, see response to this comment under **Process**.

Comment

SP-4 Is the planning/watershed process working in the model watersheds?

Response Yes, we believe it is successful. The eight-step process outlined in this EIS was not specifically applied to the Model Watersheds, but similar steps with the same intended outcome have been successfully applied. Each is still in a different stage of implementation, but all are moving in a positive direction. The Council will publish a review of the Model Watershed program sometime in mid-1997. This review will discuss both positive and negative aspects of the model watersheds.

Comment

SP-16 How do you form a watershed group?

Response Consult with your local tribes, State Fish and Wildlife/Water Resources/ Environmental Protection agencies, conservation districts, other environmental groups, and adjacent landowners to see whether any groups exist at present. If not, determine the interest in forming such a group. Once a group is formed, or is in the process of forming, you can apply for funding for coordination, project implementation, monitoring, education or other activities through the Northwest Power Planning Council's process. There are other organizations with funding for watersheds such as Oregon's Governors Watershed Enhancement Board (GWEB), Natural Resources Conservation Service (NRCS), state conservation commissions,

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and For the Sake of the Salmon. The Pacific Rivers Council (Eugene, Oregon) has also published a document with potential watershed funding sources

Comment

SL-6 Is there a project list somewhere for all of the BPA Fish and Wildlife projects?

Response Yes, it is available on the Internet at www.efw.bpa.gov:8080. If you don't have access to the Internet, you can call Kasi Beale at (503) 230-5885 to get a copy.

Comment

LB-4 Would like to know process of how application for project funding is done. (i.e. NPPC ⇒ CBFWA ⇒ BPA ⇒ Applicant).

Response The Council develops a list of projects that are proposed to BPA for funding under its fish and wildlife mitigation program. This is done annually, generally beginning in January, with a solicitation of proposals for continuation of ongoing and new projects. Projects are generally selected by August or September, with new funds available by October 1 of each year. You can ask BPA or the Council to be included on proposal mailing lists. For more information on the project application and prioritization process, please contact the Council.

Comment

LB-24 What types of projects would BPA fund? How would projects be identified? [See also **Funding**.]

Response BPA funds most projects recommended by the Council. (See Comment LB-4 above for a review of the overall selection process.) Individual project selection and prioritization within a watershed is based upon the eight-step process outlined in this EIS. These projects are then reviewed for consistency with the overall fish and wildlife program objectives and the watershed objectives by BPA before funding. The bottom line for funding is increased habitat productivity for fish and wildlife species.

Comment

10-02 Here, on the upper Flathead River, we have two power dams that affect fish habitat and welfare. Nearby, on the Kootenai River, is another. In these affected environments we have three threatened or endangered species and, at least, one more that is critical. Yes, we are concerned.

*Gordon Stewart,
President
Flathead Wildlife, Inc.*

LB-22 Libby Creek and Fisher River need to be considered for project work.

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SP-6 Latah or Hangman Creek (tributary to Spokane River) is one of the worst in Washington, maybe even Washington, Idaho and Oregon. Major sedimentation problem.

Response Thank you for your concerns and comments. We have passed these suggestions on to the appropriate watershed groups for consideration.

Comment

SL-8 We believe the old sawmill site [in Salmon] would be an ideal location for a hatchery. A hatchery at that site would help mitigate some of the economic impacts on the town of Salmon.

SL-9 Also, our relatively new high school [in Salmon] must be converted from a sawdust-fired boiler to other fuel, because the mill was our sawdust fuel supplier.

Response Thank you for your comment, but mitigation for economic impacts is outside the scope of this EIS.

Comments

LB-1 River fluctuations are important around Libby Dam. Fluctuations need to be gradual over a certain period of time.

LB-2 Can Libby Dam be eliminated from the River System without having an effect on the hydropower system? Is it possible for Libby Dam to function without being a part of the hydroelectric power on the Kootenai River?

LB-3 People would like to see the Kootenai River have more gradual fluctuations in CFS. Right now, fluctuation is far too great and fast.

LB-5 Recreation loss - The reservoirs by Libby and Hungry Horse Dams are always about 20 feet below pool during peak recreation times (summer) while reservoirs down river are only about 5 feet below pool.

LB-6 Other reservoirs should "give up" some water too, instead of it always coming out of the upper river dams, which deplete our recreation resources.

LB-10 When reservoir levels (Kooconusa) are so far down in late summer, wind blows through the canyon and causes severe dust and sediment, degrading the air quality.

LB-13 Consider varial zone in Kootenai River due to fluctuating summer low levels for anadromous fish, which cause the overall population of aquatic insects to decline, and stranding fry.

LB-14 Consider gradual flow changes, i.e. about 10% flow/day.

LB-15 Better coordination between dams, i.e., Hungry Horse and Libby need not be the only river with fluctuations.

LB-19 Consider economics of river operation on tourism and guiding for fishery.

LB-21 What is BPA's position on the variable drawdown possibility?

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LB-28 Drawdowns at Libby Dam affect fishing and recreation income and economies to counties and local communities. Pool controlled by others outside the area.

LB-29 Murray Springs Hatchery was supposed to be mitigation for Libby Dam, but most fish go to lakes in other areas - Flathead and Lake Counties.

Response: Thank you for your comments. However, they fall outside the scope of this EIS. These comments from the Libby public meeting pertain to the drawdowns at Libby and Hungry Horse dams. These drawdowns are due to the operations of the hydrosystem, and are therefore outside the scope of this EIS. These operations were covered under the System Operation Review EIS. We have passed these comments on to the BPA group that reviews the operations of these dams.

Comments

11-03 Please fund contingency plans for dam deconstruction after their useful half-life is spent. [Commenters give example of deconstruction plan for Hungry Horse Dam after aluminum plant ceases operating, with a goal of eventually restoring the entire Swan Range to its original wild state.] Deconstruction is the ultimate form of mitigation.

*Steve Kelly and Mike Bader
Friends of the Wild Swan, Inc./Alliance for the Wild Rockies, Inc.*

11-04 [Commenters suggest specific dam locations where fish passage structures might be built.] There are many dams without fish passage that deserve to be studied and fitted with fish passage structures. Adfluvial and fluvial forms of bull trout would benefit greatly. Throughout its range, BPA should fund fish passage projects to reconnect the former migratory range of bull trout.

*Steve Kelly and Mike Bader
Friends of the Wild Swan, Inc./Alliance for the Wild Rockies, Inc.*

Response We suggest that the commenters direct their ideas to the Northwest Power Planning Council for potential funding; this EIS does not cover site-specific actions.

Comment

LB-30 If Kootenai Coordinator is being hired by Montana F&W, why haven't they advertised locally and/or coordinated with Courty government.

Response We have passed this comment on to the Montana Department of Fish and Game.

Comment

SP-17 Who is funding the work at Hanford to clean up contamination?

Response The Federal Department of Energy is funding this work.

Comment

SP-23 Is BPA doing land trusts for wildlife purposes?

Response: No, we are not.

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