

APPENDIX C
COMMENT LETTERS RECEIVED

Letters received commenting on the Watershed Management Program Draft EIS:

| <u>Log Number</u> | <u>Name</u> | <u>Affiliation</u> |
|-------------------|--|---|
| WMP-03-001 | <i>Found not to be on this project</i> | |
| WMP-03-002 | Mark Tipperman | |
| WMP-03-003 | Roberta Bates | |
| WMP-03-004 | Mike Keppler | |
| WMP-03-005 | Sidney N. Clouston, Jr. | Clouston Energy Research |
| WMP-03-006 | Steve Wegner | |
| WMP-03-007 | John and Donna Skovlin | |
| WMP-03-008 | Joseph R. Maroney | Kalispel Tribe of Indians |
| WMP-03-009 | Herbert A. Pollard II | Idaho Fish & Game, Clearwater Region |
| WMP-03-010 | Gordon Stewart | Flathead Wildlife, Inc. |
| WMP-03-011 | Steve Kelly and Mike Bader | Friends of the Wild Swan, Inc./Alliance for the Wild Rockies |
| WMP-03-012 | John Etchart | Northwest Power Planning Council |
| WMP-03-013 | Steve Martin | Washington Department of Fish and Wildlife |
| WMP-03-014 | Robert Ament | American Wildlands |
| WMP-03-015 | Candace Thomas | U.S. Army Corps of Engineers |
| WMP-03-016 | Barabara J. Ritchie Cyreis Schmitt Patty Lynch | Washington State Department of Ecology Washington State Department of Fish and Wildlife Washington State Department of Transportation |
| WMP-03-017 | Preston A. Sleeper | U.S. Department of Interior |
| WMP-03-018 | Elizabeth Holmes Garr | National Marine Fisheries Service |
| WMP-03-019 | Richard B. Parkin | U.S. Environmental Protection Agency |

Mark Tipperman
59161 McIntyre Road
La Grande OR 97850

February 15, 1996

BPA Public Involvement Office - ACS
PO Box 12999
Portland OR 97212

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| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-03-002 |
| RECEIPT DATE: FEB 20 1997 |

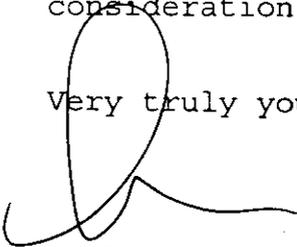
Re: Watershed Management Program Draft EIS

To Whom It May Concern:

After reviewing the proposed alternatives and the "preferred alternative" 6, it is apparent that no alternative except 3 will fulfill BPA's obligation to mitigate the adverse impacts of the Northwest Hydroelectric System.

The watersheds' overriding concern must be restoration of the riparian areas and wetlands destroyed and damaged by the hydroelectric system. Concerns about local economies, 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.

Very truly yours,



Mark Tipperman

403 "M" Avenue
La Grande, OR 97850
February 12, 1997

Bonneville Power Administration
Public Involvement Manager
P.O. Box 12999
Portland, OR 97212

Re: Watershed Management Plan,
Draft Environmental Impact Statement

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| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-03-003 |
| RECEIPT DATE: FEB 24 1997 |

Dear Council:

You have released the draft proposal for the development of set standards for approving projects designed to reverse the loss of resident and anadromous fish habitat.

We have studied the six alternatives in the draft and believe that Alternative 6, if implemented, will provide the best protection for the fish and related environmental conditions.

There are four requisites in this alternative that are especially important:

2. Involve Stakeholders - "Develop an effective public involvement program that includes a variety of ways to solicit public input." (This is a major consideration when spending public monies for projects involving resources 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.)

3. Develop a Statement of the Desired Future Condition - "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."

4. "Establish baseline information for watershed against which change can be measured".

5. "Include as project goals: protection and improvement of a variety of fish habitats, including spawning beds, overwintering and rearing areas, resting pools, protective cover" - - 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.)

"A future condition that is self-sustaining after initial improvements have been completed" - should be an accepted dictate in granting money for any kind of a project. Periodic checking should be an expected provision.

Under 2.1.7, paragraph 3b, the phrase, "-and to avoid adverse impacts on land use, local economies related to the environment" - should be eliminated or more precisely explained. It is too broad and could be a loophole for unwanted but necessary restructuring.

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.

It seems logical that the first step should be to analyze the whole stream, identify all the problems in the entire length, determine specific solutions needed for deficiencies throughout the span, then set priorities for problems most urgently needing reconstruction. That could be done regardless of ownership or location. Then each project would augment the general plan.

For instance, if there is a loss of pools, then the locations should be mapped and possible solutions be deliberated. Projects could then be planned and solutions for implementation be developed. If there is great need for temperature reduction, then all effective ways to make the water cooler should be espoused and mapped for the entire length of the stream even though achievement seems doubtful. In short, the total length of each river or stream should be analyzed, solutions for rejuvenation charted, and logical procedures for accomplishing the total recovery undertaken. 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. My recommendation would be a coordinated program to work on all the problems of all the stream at the same time.

I sincerely believe that if a total, correlated plan were developed and presented to the public, there would be a good response even from private land holders. It would, of course, dictate large sums of money but would be more productive in the long term and save the expenditure of money on useless unrelated projects.

Catherine Creek would be a good place to experiment. There should be a synchronized restoration of all the deficiencies in a defined stretch of the stream.

We cannot understand how it is 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 and 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 compliment the overall plan or will it be liquidated by depleted climates above and below the project location?

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.

We are convinced that 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.

It is conceivable that the millions of grant money could be spent on numerous ineffective projects and there will be little recuperation of habitat or increase in fish count. We suspect that fact would not be of grave concern to farmers and other commodity users of the stream waters for whom the efforts to protect and preserve the fish are a nuisance at best. The total demise of all fish would have little impact on their lives. Exhausting all the funds and grants by trifling projects would line their pockets and take care of the annoying fish problem at the same time. Leaving the approval of projects in the hands local water resource users could insure that occurrence.

We request that you 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.

Yours truly,



Roberta Bates

Copy to: Eric N. Powers, BPA
P.O. Box 3621-ECN
Portland, OR 97208-3621

RECEIVED BY BPA
 PUBLIC INVOLVEMENT
 # 03-004
 RECEIPT DATE: MAR 11 1997

"I'd Like to Tell You..."

1. The best alternatives are (and tell why): ^{#3} To Design & Construct unobstructed Natural-feeling ^{look of} water flows around all man-made structures that ~~detour~~ fish from migrating up or down old Natural water routes to spawning areas. Instead of spilling over or thru dams and other obstructions. ^{is not enough} Concerned with only doing what's required by law.
2. The alternatives I least prefer are (and tell why): ^{#4} Not Enough is being done and policies in effect such as draw downs are more adverse than effective as far as wildlife and Aquatic Habitat is concerned.
3. Other management techniques you should consider: ^{#6} Has too many Action Alternatives and by time all are addressed - Nothing or little will be done because of adverse impacts on land, economics, recreation, etc.
^{#3} The more restoration of habitat the better - it can only enhance the quality of life of all creatures including man.
4. 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: Not what will happen to them but what they have done to the ecosystem. Turn the table when they start to wince about something.
5. I think the environmental analysis would be better if you: ^{#5} Stop being concerned with impacts to Man and Commercial Use and look at strictly Natures need for free flowing unmanipulated use of the water ways and adjacent lands.
6. I also have these comments: For fifty years or probably more private and Government Agencies have spent millions and millions on studys and impact statements. Lets start implamenting some real projects that will have a true and everlasting affect for the better of all. Thanks for your time & efforts.
 (Need more space? Please use the back side of this sheet.)

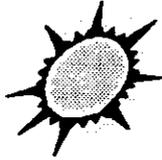
Please put me on your project mailing list. (You are already on the mail list if you received the Watershed Management Program Draft EIS information in the mail.)

Name Mike H. Keppler Phone 466-0804
 Address N. 10510 Overviews Dr. Spokane Wa. 99207

Please mail your comments by March 25, 1997 to:

Bonneville Power Administration
 Public Involvement Office - ACS
 P.O. Box 12999
 Portland, OR 97212





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| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WATER-03-005 |
| RECEIPT DATE: MAR 13 1997 |

CLOUSTON ENERGY RESEARCH

7846 SW 171st Place
Beaverton, OR 97007

Telephone (503) 642-1886

Bonneville Power Administration
Public Involvement Manager
P.O. Box 12999
Portland, OR 97212

March 7, 1997

RE: Watershed Management Program Standards and Guidelines.

Dear Public Involvement Manager:

Thank you for this opportunity to comment on the Bonneville Power Administration's (BPA) Watershed Management Program Draft Environmental Impact Statement (EIS).

As is stated in chapter one of this EIS, a framework may be established where the BPA manager's prescriptions may serve as a guidance to specific projects within a plan. The requirement exists for BPA to consummate mitigation actions for the loss of fish and wildlife habitat caused by the reservoirs and dams.

Without exception the alternatives have common elements which are stated in chapter two, section 2.1.1, one through eight. 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 and will be the focus of my comments presently.

Because of new information a status quo process should not be selected. Therefore the first alternative, "No Action" ought not be selected. New is not always better, but it is often better when experience and other feedback sheds more light.

Alternative two contains elements that are shared with the remaining alternatives. It also provides a standardize base for them. However, "Many Best Management Practices (BMPs)" which are not required by law are not addressed. It would cause a loss of many good opportunities of productive collaborations, benefiting many groups and programs. For an example, Tom McKinney could write prescriptions for the preferential treatment of at risk youth and/or first time offender populations in training and employment actions in projects. Comments to BPA's Wildlife Mitigation Program EIS were submitted by me that discuss this approach and opportunity for BMPs application.

As in most cases, a balanced approach is best. It is the preferred alternative of BPA, and embraces most of the good elements of each alternative. Nevertheless, the need of specific projects that improves habitat exists. The entire watershed of the Columbia/ Snake rivers are not involved. It cannot be involved with alternative four, Cost and Administrative Efficiency Emphasis. 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. 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.

Lastly, I would like to mention that in the Columbia River Basin Fish and Wildlife Program is the obscure section that pertains to the technology aspect of new information and technology for adaptive management. It is found in Section 13 where 13.1F "Promising New Ideas for Improving Salmon Survival" states: "This measure is intended to provide an expedited process to encourage innovative approaches to improving salmon survival." Adaptive management ought to 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 be developed and applied where appropriate.

Best regards.

A handwritten signature in cursive script that reads "Sidney N. Clouston, Jr.".

Sidney N. Clouston, Jr.

cc: Northwest Power Planning Council
Fish and Wildlife Division
851 S.W. Sixth Avenue
Suite 1100
Portland, OR 97204-1348

Comment rec'd 3/11/97

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| RECEIVED BY BPA PUBLIC INVOLVEMENT WATER-03-004 LOG#: I S T R A T I O N |
| RECEIPT DATE: " MAR 19 1997 |

"I'd Like to Tell You"

1. The best alternatives are (and tell why): Alternative 3 and 1
These alternatives best support your purpose and need Statement of "mitigating for quadramous and resident fish habitat lost during development of the FCRPS."
2. The alternatives I least prefer are (and tell why): 4, 5 and 2. They take to many other factors into account. The main emphasis of the EIS is to "repair" lost habitat due to the dams, ALTS 4, 5 and 2 do this to a much less extent than ALTS 3 and 1 and 6.
3. Other management techniques you should consider: you need to make sure that the actions you fund do not result in added damage. We in the USFS have been using the "ROSGEN" techniques to analyze and plan stream restoration projects. He suggests various restoration techniques that ->
4. Other environmental resources you should consider: Because your purpose and need is to mitigate lost or changed fish habitat, your considerations need to start with in-channel work but also include floodplain concerns and up slope activities, especially on private lands
5. I think the environmental analysis would be better if you: I think this effort 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 banks like the Keokousi, Clarkfork, Snake, etc.
6. I also have these comments: I am a district Hydrologist for the USFS in Libby, MT. we (the USFS) would be interested in using some of these funds to implement restoration projects.

(Need more space? Please use the back side of this sheet.)

Please put me on your project mailing list. (You are already on the mail list if you received the Watershed Management Program Draft EIS information in the mail.)

Name Steve Wegner
 Address 5621 Bobtail Rd.
Libby, mt. 59923

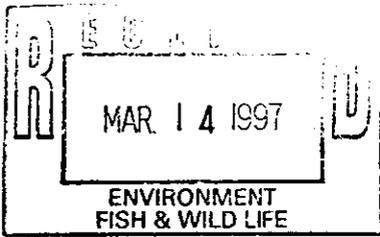
Please mail your comments by March 25, 1997 to:

Bonneville Power Administration
 Public Involvement Office - ACS
 P.O. Box 12999
 Portland, OR 97212



#3 cont.

can include root-wad revetments, resculpting of flood plains
vortex-rock weirs, and various other types of in-channel structures.



P.O. Box 121
Cove, OR 97824
March 12, 1997

Department of Energy
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

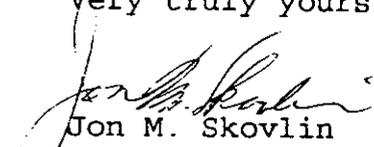
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| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WATER-03-007 |
| RECEIPT DATE: MAR 24 1997 |

Dear Sirs:

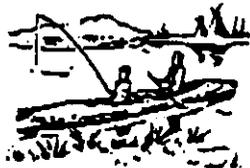
This letter is in response to your invitation to review and comment on BPA's Draft Environmental Impact Statement for the Watershed Management Program.

We would 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.

Very truly yours,


Jon M. Skovlin


Donna Skovlin



Kalispel Tribe of Indians

March 25, 1997

Bonneville Power Administration
Public Involvement Manager
P.O. Box 12999
Portland, OR 97212

Dear Public Involvement Manager:

Below are comments provided by the Kalispel Tribe of Indians on Watershed Management Program Draft Environmental Impact Statement. Of the alternatives provided, Alternative 6 (BPA's preferred alternative) is the most agreeable.

- Chapter 1/3 "The goal of these projects is to assist recovery efforts for anadromous fish in the CRB."
Comment: 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."
- Chapter 3/51 Kalispel Tribe of Idaho
Chapter 8/135 Kalispel Tribe of Idaho
Glossary/i Comment: 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.

I look forward to commenting on the Final Environmental Impact Statement.
Thank you for your consideration in reviewing this document.

Sincerely,

Joseph R. Maroney
Fisheries Program Manager



IDAHO FISH & GAME

CLEARWATER REGION
1540 Warner Avenue
Lewiston, Idaho 83501-5699

March 19, 1997

Philip E. Batt/Governor
Stephen P. Mealey/Director

Eric Powers
Environmental Project Leader
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208

| |
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| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WATER 03-009 |
| RECEIPT DATE: MAR 23 1997 |

Dear Eric,

We have reviewed the summary of the watershed management program DEIS. We offer the following comments on the DEIS.

We agree that there is a need for a programmatic approach to BPA's watershed program. Many potential BPA-funded mitigation, conservation, and rehabilitation projects can be implemented by existing agencies including the Natural Resources Conservation Service, the Idaho Department of Fish and Game, the U.S. Forest Service, private timber companies, the Nez Perce Tribe, and Department of Environmental Quality. However, to achieve aquatic habitat objectives while being cost and administratively efficient and in compliance with laws and regulations, we suggest the alternatives and EIS attempt to achieve these objectives by defining using an interagency approach to project prioritization, implementation, and monitoring. We suggest this because the projects and agencies funded under BPA watershed program usually do not have the expertise or resources to achieve the 8 steps identified in the DEIS summary. Additionally, as has been proven in the past, a NEPA-type effort to solicit comments or consultation with affected stakeholders is not as effective as participation, involvement, and responsibility for projects. Therefore, our suggestion is that decisions on alternative emphasis not be decided on a programmatic level by BPA's watershed management program but by interagency process defined by this EIS. 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.

We hope you will consider these suggestions. Please keep us informed and involved in the process. Thank you for the opportunity to comment.

Sincerely,

Herbert A. Pollard II
Regional Supervisor

HP/GS

cc: NRPB, NRCS, Lewiston; USFS, Orofino and Grangeville; DEQ, Lewiston; NPT, Lapwai; Potlatch Corp.; Plum Timber Company

FLATHEAD WILDLIFE, Inc.
P.O. BOX 4
KALISPELL, MONTANA 59903

March 17, 1997

Department of Energy
Bonneville Power Administration
P. O. Box 3621
Portland, OR
97208-3621

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|---|
| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WATER-03-010 |
| RECEIPT DATE: MAR 23 1997 |

Dear Sirs:

Flathead Wildlife Inc. wishes to thank the Bonneville Power Administration for the opportunity to review and comment on the Draft Environmental Impact Statement for the Watershed Management Program. Flathead Wildlife is a sportsmen's group situated in Kalispell, Montana. We have some 100+ members and are concerned with the management and protection of the environment for the welfare of our fish and wildlife.

Of the six alternatives presented, FWI agrees with BPA that the Balanced Action alternative is preferred over the other five. 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.

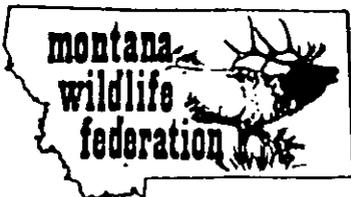
A problem, as we see it, is the amount of time that it takes to implement a plan. Often, opportunities are lost before a plan can work its way through the red tape. We would like to have someone investigate the possibility of some agency being able to step in and secure these opportunities until such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

Again, thanks for the opportunity to comment on this EIS.

Sincerely,

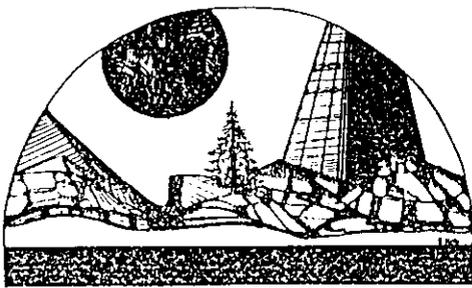


Gordon Stewart,
President



The Wealth Of Our Nation Is In Its Natural Resources
Preserve It By Conservation, Not Conversation





FRIENDS OF THE WILD SWAN
P.O. BOX 5103
SWAN LAKE, MONTANA 59911
(406) 885-2011

Eric N. Powers, Environmental Project Leader
Department of Energy
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

March 24, 1997

re: Watershed Management Program DEIS comments

Dear Mr. Powers:

Please accept the following comments on behalf of the Friends of the Wild Swan, Inc. and Alliance for the Wild Rockies, Inc. relating to the BPA's DEIS to establish standards and guidelines for funding the planning and implementation of watershed conservation and rehabilitation projects in streams tributary to the main stem Columbia and Snake Rivers.

First, let's start with things we hope BPA won't support, including, but not limited to:

- 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 electroshocking 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.
- 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).

Prevention - Please fund projects that prioritize preventative measures. In many cases preventing additional 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 roadless 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.

Dam Deconstruction - Please also fund contingency plans for dam deconstruction after their useful half-life is spent. For example, the Hungry Horse Dam near Glacier National Park should have its own deconstruction plan which activates upon final shut-down of the Columbia Falls Aluminum Plant. An artful use of the Army Corps of Engineers' talents could turn the dam into a triumphal archway for the river to run through. Once the South Fork of the Flathead River is reestablished, one of the two roads leading into the Bob Marshall Wilderness could be eliminated. The entire Swan Range could be restored to its original wild state. Wildland restoration projects like this should be a long-term goal of dam mitigation projects, especially those dams built primarily to subsidize industrial users. Deconstruction is the ultimate form of mitigation.

Fish Passage - The Milltown Dam in Bonner, Montana is a good candidate for some type of fish passage structure to reconnect migratory bull trout populations in the Clark Fork River with bull trout now isolated in the Blackfoot River. The dam at Bigfork on the Swan River is another possible location for fish passage if there is a way to sort out (and eat) the lake trout. The dam on Rattlesnake Creek in Missoula is another barrier to bull trout migratory patterns. There are many dams without fish passages 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.

Multiple Species Strategies - Please require multi-species approaches to mitigation projects. This means 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 projected.

All too often single species approaches are reactive and not always beneficial to the overall health and welfare of aquatic ecosystems. The great salmon hatchery (add barging) debacle is a good example of how an intensive single-species recovery campaign to save anadromous salmon further disrupted the ecological balance for all native fishes, including the target species, wild salmon. BPA funded projects should ensure that

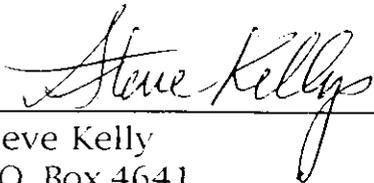
projects designed to benefit one targeted species does not succeed at the expense of other species living in the same ecosystem.

Habitat - 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 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 — holding the line— 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.

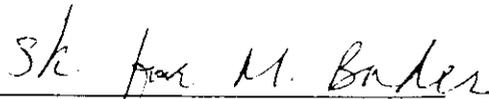
Alternative 3, however, has its downside. Its reliance on words like "flexibility" for project managers, "adaptive management" and other weasel words cannot be left undefined. Forest Service, ELM, state school trust lands managers consistently abuse these words to delay action. These terms must be defined in full detail to prevent abuses of management discretion and unreasonable delay. Better yet, don't use any language that could be used to subvert the goals and objectives of Alternative 3 of BPA's Watershed Management Program. If Alternative 3 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.

Thank you for the opportunity to comment.

Sincerely,



Steve Kelly
P.O. Box 4641
Bozeman, Montana 59772
(406) 586-0180



Mike Bader
P.O. Box 8731
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(406) 721-5420

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cc Bob B., Nancy W., Bob L., Mark
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503-222-5161
1-800-222-3355

Internet:
www.nwppc.org

March 28, 1997

Randall Hardy, Administrator
Bonneville Power Administration
P. O. Box 3621 - Routing A
Portland, Oregon 97208

Dear Randy:

The Council has reviewed Bonneville's recently released Watershed Management Program Draft Environmental Impact Statement with great interest. The draft EIS addresses a portion of the program that is very important to the 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. Our comments are meant to clarify what we believe to be the intent of the EIS.

As stated in the draft EIS, the recommended alternative (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. Further, it states that this alternative would implement watershed management programs or projects more efficiently and with greater consistency than under the current case-by-case basis. The Council agrees with these statements. We agree with Bonneville that the other alternatives are not adequate to fully meet the needs of the watershed program. For this reason the Council supports alternative 6.

The Council requests that the EIS contain 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. This comment is not meant as a criticism of the EIS, instead it is meant to ensure that good opportunities are not foreclosed.

As you are aware, recent reports authored by three independent scientific panels -- the Independent Scientific Group, the National Research Council, and the National Marine Fisheries Service Salmon Recovery Team -- have called for ecologically-oriented approaches to restoration of



State of Washington

DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N, Olympia, WA 98501-1091 - (206) 902-2200; TDD (206) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: WATER-03-013

RECEIPT DATE:

APR 07 1997

DATE: April 04, 1997

TO: BPA Public Involvement Manager

FROM: Steve Martin, WDFW Area Habitat Biologist in southeast Washington

SUBJECT: **Comments on the Watershed Management Program draft EIS (DOE/EIS-0265)**

The Washington Department of Fish and Wildlife (WDFW) supports the concept of the Model Watershed Program. The WDFW has been involved with several Bonneville Power Administration (BPA) model watershed projects funded in the past few years. 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.

The first comment on the DEIS is that BPA has funded small demonstration projects under the Model Watershed Program. One of the model watersheds is the Tucannon River watershed. In this watershed the Council approved a number of "Early Action" projects for implementation in 1996, with funds earmarked for Endangered Species mitigation. In the Tucannon Watershed Program, critical habitat areas for spring chinook salmon were identified, but numerous 1996 projects were completed in areas outside of the critical habitat. This may have been done because landowners outside the critical habitat areas were willing to cost share on projects that provided them bank protection. Stable banks are an essential element to habitat improvement, however, if such projects are completed outside the critical habitat areas, benefits to the critical stocks are negligible. Perhaps instream habitat improvement projects in the critical habitat areas should be funded at 100% in 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.

It has been identified that large pools with woody debris is limited each watershed. Rock and log weirs, accompanied with root wads provide such habitat. Project managers should focus on large pool habitat improvements in this river. 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. Although the project plans include dormant stock plantings at each site, project sponsors should be encouraged to develop techniques to plant rooted-stock at the time of

project construction, as dormant stock plantings are difficult to establish in rip rap or river cobbles; it is much easier, both monetarily and logistically to excavate a hole while the equipment is on site than to try and get dormant poles established with hand tools. Beaver, and other rodents are also problematic in the basin and tend to prefer the young dormant plantings in the spring and summer. Rooted stock should be planted at the time of construction and the trees be protected from beavers. This requirement should be included in the Watershed Management Program and project managers must implement such a planting strategy in their proposal for funding from BPA. Environmental impacts are much greater if revegetation is not successful at a site that has been disturbed by construction activities.

Project proponents (managers) need to establish some quantitative metric to gauge success or failure. This issue should be resolved in the Watershed Management Program and each proponent (manager) should be held responsible for establishing a goal in which some statistical measure of change can be compared to see if the goal is met. The measure should include an element of time and measure of change. Watershed projects must be efficient because all fish and wildlife projects compete for funding under the BPA's Fish and Wildlife Program funding cap. Therefore, the measurable benefits of these projects for salmonids should be closely monitored and evaluated by BPA and others. Ecological monitoring is difficult and requires many years to detect a change, considering the amount of natural variation in most metrics assessed.

Project evaluation needs to occur to determine if fish are utilizing the instream habitat structures and to evaluate which structure is preferred. An array of structures have been constructed in Asotin and Pataha creeks, and in the Grande Ronde and Tucannon rivers, and each is designed to improve habitat conditions for salmonids. Without evaluation, future designs may mirror existing designs, and without a rigorous monitoring and evaluation element to each project we may never know which projects are utilized or preferred by the target species. This issue is the fundamental premise for the Program and needs to be a requirement placed upon each proponent prior to funding. An evaluation effort helps ensure that the program provides substantial benefits to fish and is accountable for expenditures of public funds.

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.

We reiterate our support of the concept of local involvement in planning and decision making encompassed in the model watershed program. We ask that the Bonneville Power Administration 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.

Thank you for the opportunity to comment on this draft EIS for the model watershed program.



American Wildlands

March 25, 1997

Bonneville Power Administration
Public Involvement Manager
P.O. Box 12999
Portland, OR 97212

| |
|---|
| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WATER-03-014 |
| RECEIPT DATE: APR 14 1997 |

RE: Watershed Management Program DEIS

Dear BPA:

I would like to submit comments on the BPA's Watershed Management Program Draft Environmental Impact Statement on behalf of American Wildlands. We appreciate BPA's effort 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.

With the recently released reports on the status the Interior Columbia Basin by the interagency effort developing ecosystem management, we feel adequate information exists for BPA to develop a meaningful Watershed Management Program. The reports: "Integrated Scientific Assessment for the Ecosystem Management" and "Status of the Interior Columbia Basin, Scientific Findings" indicate the aquatic condition and many of the dependent species of salmonids, as well as other riparian/aquatic species are in serious decline in the Interior Columbia River Basin.

From AWLs perspective, 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 FEIS so that the necessary watershed management activities are developed rapidly and more are completed sooner than later.

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.

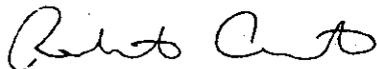
We support an emphasis on the whole watershed rather than simply on riparian and in-stream habitat. Recent flooding and

landslides throughout the region were often a result of management activities further from the watercourses than Alternative 3 contemplates. Thus, Alternative 3 should be changed in the FEIS to aggressively restore a much larger land area under BPA approved management/mitigation activities. This also will ensure a sounder ecosystem approach.

Lastly, "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. This report should be incorporated into the FEIS as completely as possible.

Thank you for considering our comments on the Draft EIS. We would appreciate receiving a copy of the Final EIS.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert Ament".

Robert Ament, Resource Specialist



REPLY TO
ATTENTION OF

Planning Division

Bonneville Power Administration
Public Involvement Manager
P.O. Box 12999
Portland, Oregon 97212

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
215 NORTH 17TH STREET
OMAHA, NEBRASKA 68102-4978
March 21, 1997

| | |
|---|-------------|
| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WATER-03-015 | |
| RECEIPT DATE: | APR 14 1997 |

To Whom it may Concern:

We have reviewed the Bonneville Power Administration Watershed Management Program Draft Environmental Impact Statement and have the following comments:

1. The document begins with a summary, yet the environmental consequences of the alternatives are not summarized.
2. Section 1.7 contains a "list of issues" identified during the scoping process. The listing is more a categorization of the issues, rather than detailed statements of what the issues are. For example, wetlands resource management is at issue; but 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.
3. Table 2-2 presents a comparison of the environmental consequences of the six alternatives. It is difficult to compare the alternatives because dissimilar language is used. Take for example the Fish/Water Resources and Quality environmental resource category. It is stated that Alternative 1 (No Action) may cause temporary exceedences of state water quality (sediment) standards due to construction disturbance of soils and channels. For Alternative 6 (Preferred Alternative), it is stated that short-term, construction-related impacts are mitigated to the extent practicable. Would not construction-related impacts to water quality be mitigated to the extent practicable under Alternative 1? It is stated that Alternative 1 would benefit fish and water quality as aquatic and riparian habitat is restored and/or protected. For Alternative 6, it is stated that moderate improvements in fish and riparian habitat would result, including immediate and sustained benefits to fish. Would not the benefits to fish under Alternative 1 be moderate, immediate, and sustained?
4. Chapter 4 begins with a statement that the primary objective of the watershed program is to increase and sustain anadromous and resident fish populations by increasing the amount of high quality habitat available to these populations. It is stated in section 4.2.2 that Alternative 1 would benefit fish and water resources/quality overall because of the nature of the 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 discussed above. Are significant beneficial impacts expected? Will high quality habitat become available to anadromous and resident fish populations? It is stated that Alternative 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 adverse impacts are expected. Again, this section does not support the statement made in Table 2-2 discussed above. Will high quality habitat become available to anadromous and resident fish populations? Are significant short-term adverse impacts expected?

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Candace Thomas". The signature is written in a cursive style with a large, sweeping initial "C".

Candace Thomas

Chief, Environmental Analysis Branch
Planning Division



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

March 21, 1997

Bonneville Power Administration
Public Involvement Manager
PO Box 1299
Portland OR 97212

| |
|---|
| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WATER-03-016 |
| RECEIPT DATE: APR 14 1997 |

Dear Sir:

Thank you for the opportunity to comment on the draft environmental impact statement (EIS) for the Watershed Management Program (DOE/EIS-0265).

Consistent with the Department of Ecology's responsibilities as Washington State's coordinator for the National Environmental Policy Act, we are forwarding the comments received from the State of Washington, Department of Transportation and Department of Fish and Wildlife.

Washington Department of Fish and Wildlife has expressed that the EIS or Watershed Management Program should give further consideration to addressing limiting factors, outcome monitoring, future watershed land uses, and regionally specific management techniques. They have also expressed concern related to possible impacts to the Wildlife Caucus budget, as well as more specific comments. If you have any questions on the comments made by Washington Department of Fish and Wildlife, please call Ms. Cyreis Schmitt at (360) 902-2416.

Washington Department of Transportation's comments focused on the need and benefits of consultation and coordination with state and local agencies. For questions on the comments from Washington Department of Transportation, please contact Ms. Patty Lynch at (360) 705-7448.

After reviewing the document, Ecology Program staff have the following comments.

- (1) Regarding habitat modification projects, monies should be set aside for evaluation of the projects' effectiveness in meeting program objectives.
- (2) In Section 4.2.1 (1), the description of Washington State Department of Ecology 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.

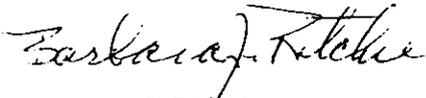


Bonneville Power Administration
Public Involvement Manager
March 21, 1997
Page 2

- (3) Under Section 4.2.4 -- Potential Program-Wide Mitigation Measures, the last bullet should include: obtain water rights for withdrawal of water from the state where the project is being considered.
- (4) Section 4.2.4 should also have an additional bullet, stating: Coordinate with state and local water resource and water quality agencies to share data collection efforts in project areas.

If you have any questions on Comment (1), please call Mr. Bill Young with our Shorelands Program at (360) 407-6399. For questions regarding Comments (2) through (4), please contact Mr. Chris Anderson with our Water Resources Program at (360) 407-0272.

Sincerely,



Barbara J. Ritchie
Environmental Review Section

BJR:ri

Attachments (2)

EIS #970720

cc: Chris Anderson, SWRO
Patty Lynch, WDOT
Carol Mortensen, CRO
Cyreis Schmitt, WDFW
Debra Smith, CRO
Abbe White, SWRO
Bill Young, SWRO



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 600
Portland, Oregon 97232-2036

IN REPLY REFER TO

April 15, 1997

ER 97/0084

Bonneville Power Administration
Public Involvement Officer
P.O. Box 12999
Portland, Oregon 97212

| |
|---|
| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WATER-03 017 |
| RECEIPT DATE: APR 22 1997 |

Dear Sir:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Bonneville Power Administration (BPA) Watershed Management Program (Watershed Program), States of Idaho, Montana, Nevada, Oregon, Washington, and Wyoming. The following comments are provided for your use and information when preparing the Final Environmental Impact Statement (FEIS).

GENERAL COMMENTS

The Alternative 6: Balanced Action, BPA's Preferred Alternative, purports to balance cost factors, administrative efficiency, and protection and improvement of environmental resources with aquatic habitat objectives. Also, it would establish a standard planning process and apply a program-wide mitigation measures. 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 habitat improvement projects would have beneficial environmental components.

The various habitat improvement techniques listed are appropriate although some techniques 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. 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.

Sincerely,

Preston A. Sleeper
Acting Regional Environmental Coordinator



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

March 20, 1997

Eric N. Powers
Project Leader
Bonneville Power Administration
Public Involvement Manager
Post Office Box 12999
Portland, Oregon 97212

Dear Mr. Powers:

Thank you for the opportunity to review the Bonneville Power Administration (BPA) Draft Environmental Impact Statement (DOE/EIS-0265) for BPA's Watershed Management Program. 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.

General Comments:

Of the alternatives presented, the Department of Fish and Wildlife supports Alternative 6. This alternative appears to provide the best all around approach for evaluating, ranking, implementing and monitoring watershed projects. However, we do have several questions and comments which we feel will strengthen the DEIS and implementation of the program.

We note the relationship between BPA's Watershed Management Planning Process for specific watersheds and this program and encourage wherever possible, that BPA keep "the horse before the cart" when considering specific projects. That is, the 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. To meet objectives for fish and wildlife, addressing limiting factors is essential for long-term success. Consequently, 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 an adaptive management strategy, are also essential to realize the full potential of the mitigation funds and activities. In addition, many watershed planning and implementation activities are currently underway in the Columbia Basin and we assume that BPA's watershed management program, regardless of which alternative is selected, will be coordinated with and complementary

Eric N. Powers

March 20, 1997

Page 2

to those efforts. Hopefully, watershed plans developed according to the alternative selected for BPA's watershed management program will address all these issues.

Further, projects should not assume static land use (zoning). The DEIS characterizes the affected environment as essentially rural and sparsely populated. While this may be true relative to Seattle or Portland metropolitan areas, it 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 at a rapid clip in Washington. This puts inordinate pressure on fish and wildlife resources and may limit 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.

We also note the relationship between this program and the Wildlife Mitigation Program. We understand Watershed Management projects will be funded out of the Anadromous Fish budget. It appears under preferred Alternative 6, resident fish and wildlife benefits may be expected. Will BPA be given Habitat Unit credits for wildlife benefits? The relationship between this funding process and wildlife funding is unclear. There have been concerns expressed in the Wildlife Caucus that the wildlife portion of the BPA budget may be expected to provide funding for wildlife benefits and that BPA would receive mitigation credit for watershed projects. Since the Wildlife Caucus has developed a five year budget, goals and objectives, but has not received adequate funding to support all the identified needs, will funding for wildlife benefits under this program affect the Wildlife Caucus budget? How will cost sharing between the Fish Caucus and the Wildlife Caucus be determined? The Northwest Power Planning Council (NPPC) and BPA require some kind of permanence associated with wildlife mitigation projects. Does the Watershed Management Program have a similar requirement? What steps have been taken by the Watershed Management Program to ensure consistency with the NPPC's Wildlife Program?

Regardless of which alternative is implemented there should be some room for adjustment or addition to the available management techniques illustrated in Table 2-1 and described in Appendix 1. While the list is fairly extensive, it could use some region specific techniques and allow room for "other" techniques. For example, under in-channel modifications and habitat improvement techniques, restoration of channelized reaches, dike removal or set backs should be included. Under road management techniques, there should be a hierarchical sequence which includes avoidance of stream crossings first, followed by bridges, then bottomless arch culverts, oversized culverts, temporary culverts. Perhaps early in the implementation phase, this list could be customized to more closely fit our region.

Within all alternatives there should be more discussion of the positive aspects of watershed integrity on human health and safety. For example, land use zoning which restricts development on flood plains generally results in less flood impacts to structures. Watershed treatments that

Eric N. Powers
March 20, 1997
Page 3

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.

Specific Comments:

Chapter 2/10, 2.1.3 Alternative 2: Base Response, 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, and state fish and wildlife agencies. **Change sentence to read:** Consult with affected local governments, adjacent landowners, tribes, and state fish and wildlife agencies regarding fish, wildlife, habitat, or other issues.

Chapter 2/19 first paragraph top of page: The use of the term "non-target wildlife" seems inconsistent with the previous paragraph and the intent of this Alternative. **Delete "non-target"**

Chapter 2/20, paragraph 4, first bullet: The use of "ecological" may be intended to be broad, but may be interpreted narrowly. **Delete:** the word "ecological" and replace it with natural resources.

Chapter 2/21, paragraph 6: What is the difference with the term "side benefit" as it is used here and "coincidental benefits" used in Alternative 3? The use of the term "side benefits" seems inconsistent with the intent of this Alternative. The preceding paragraph, (paragraph 5.) states 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".

Chapter 2/28-37, Table 2-1: The Northwest Power Planning Council's Wildlife Program is habitat based and consequently so are the Basin's wildlife mitigation projects. The Wildlife Mitigation Program EIS included a table similar to Table 2-1. 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?

Chapter 3/49, 3.6 Wildlife 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.

Within the Washington Wildlife Mitigation Projects Environmental Assessment (DOE/EA-1096), habitat types occurring on some or all of the project areas included: shrub-steppe, grassland,

Eric N. Powers
March 20, 1997
Page 4

riparian, wetland, agricultural, forest, and woodland. Although the final EIS is not yet available for the Wildlife Mitigation EIS, it is likely it will indicate more than three "general vegetation zones".

Chapter 3/50, 3.8 Cultural and Historic Resources: Wildlife mitigation projects are required to have a cultural resource survey completed prior to any ground breaking activity. Does the Watershed Management Program have a similar requirement?

Chapter 4/119, 4.13.6 Cultural Resources: Wildlife mitigation projects are required to have a cultural resource survey completed prior to any ground breaking activity. What Program-wide measures would help to protect cultural resources? If a survey is required it would lessen the probability of inadvertent impacts.

Chapter 6: References: To be consistent with the other EIS documents BPA has prepared, this EIS should identify those EIS documents which use the same types of management techniques.

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

Again, thank you for this review opportunity. We look forward to being an active partner in the implementation of this important watershed management program. If you have questions about our comments, please feel free to call me. My number in Olympia is (360) 902-2416.

Sincerely,



Cyreis Schmitt
Conservation Services Division Manager
Habitat Management Program

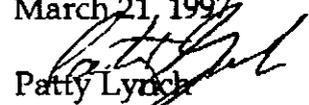
CS:SK:kam



Washington State
Department of Transportation

Memorandum

Date: March 21, 1997

From: 
Patty Lynch
Phone: (360) 705-7448

Subject: BPA DEIS - Watershed Management
Program

To: Rebecca Inmann, Environmental Review Section
Washington State Department of Ecology

Washington State Department of Transportation (WSDOT) has had an opportunity to review the Draft EIS for the Bonneville Power Administration (BPA) Watershed Management Program, and submits the following comments for inclusion in the state response letter.

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. The development of watershed-based mitigation guidance may enhance opportunities for WSDOT to coordinate transportation mitigation requirements with priorities established by BPA and the Northwest Power Planning Council. WSDOT may be in a position 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. WSDOT is committed to developing cost effective mitigation projects that provide the greatest ecological benefits based on identified needs of the watershed. The objectives described in Alternative 6 of the draft EIS compliment Transportation's interest in moving towards a watershed approach.

One concern is that the DEIS is inconsistent in it's proposed consultations with regulatory agencies. Federal, state and tribal entities are addressed. However, coordination with local jurisdictions with regard to local ordinances is not addressed. For example, Corps permits, NRCS, and compliance with the Clean Water Act are mentioned with regard to wetlands, but wetland rating, buffers, and local permits are not. In another instance, the DEIS states that the USFWS will be consulted regarding all major construction projects, but 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.

Thank you for the opportunity to comment on the DEIS. Please forward future correspondence to:

WDOE Environmental Review Section
March 21, 1997
Page 2

Patty Lynch
Washington State Department of Transportation
PO Box 47331
Olympia, WA 98504

(360) 705-7448 phone
(360) 705-6833 fax
e-mail: lynchp@wsdot.wa.gov



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
ENVIRONMENTAL & TECHNICAL SERVICES DIVISION
525 NE Oregon Street
PORTLAND, OREGON 97232-2737

F/NWO3

April 14, 1997

Randall Hardy, Administrator
Bonneville Power Administration
P.O. Box 3621 - Routing A
Portland, OR 97208

Dear Mr. Hardy:

Thank you for agreeing to receive and consider the National Marine Fisheries Service's (NMFS) comments on the Bonneville Power Administration's draft Environmental Impact Statement for the Watershed Management Program. Our findings are as follow.

We note that the program objectives are not clearly stated in the draft EIS. The program objectives stated in *1.2 Purposes* include: achievement of the Fish and Wildlife Program's aquatic habitat objectives for watershed management projects to be implemented by BPA, achievement of cost and administrative efficiency, compliance with all laws and regulations, and environmental protection. 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.

We agree that the recommended alternative (Alternative 6) provides the most reasonable approach to meeting aquatic habitat objectives of watershed management projects, ensuring cost and administrative efficiency, and protecting and improving other environmental resources. We also agree that this alternative would be more efficient and consistent than the current case-by-case management basis (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.

- * We note that the draft EIS frequently describes in-channel modifications and techniques as conservation and rehabilitation actions. Some of the in-channel modifications and techniques 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.¹ Some concerns are:

- Grade structures completely disrupt the natural bedload movement essential for developing normal pool/riffle complexes and allowing lateral channel movement^{2, 3};
- woody debris installation typically fails (or has unintended consequences), and is not a substitute for natural debris recruitment^{4, 5};
- “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.

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 restoration projects accelerate the underlying trend (and then only if well-designed). Outside of this context, active restoration projects are at best unlikely to be effective,

¹ Spence B.C. et al., 1996. An ecosystem approach to salmonid conservation, Management Technology, TR-4501-96-6057.

² Ritter, D.F. 1986, Process Geomorphology, Dubuque, IA: Wm. C. Brown.

³ Schumm, S.A. 1977. The fluvial system, New York: Wiley Interscience.

⁴ Frissell, C.A., and R.K. Nawa. 1992. Incidence and causes of physical failure of artificial habitat structures in streams of western Oregon and Washington, N. Am. J. Fisheries Management 12:182-197;

⁵ Beschta, R.L., W.S. Platts, and J.B. Kauffman. 1991. Field review of fish habitat improvement projects in the Gande Ronde and John Day River basins of eastern Oregon. Bonneville Power Administration Project 91-069 Contract DE-AP79-91BP21493, Portland, OR.

and could sometimes be harmful.

In light of NMFS' concern for aquatic habitat objectives and the sustainability of habitat improvements, the following elements should be included in BPA's preferred alternative (*Alternative 6*):

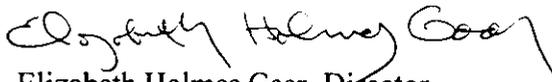
- All projects funded by BPA's watershed program should address problems or opportunities that have been identified in a watershed assessment. Without this criterion, it is likely that many projects will be funded which will not address the needs and priorities identified on a watershed or ecosystem 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 "protection and improvement of a variety of fish habitats, including spawning beds, overwintering and rearing areas, resting pools, protective cover," to include "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*.

The need for an adaptive management approach was clearly stated in the draft EIS. The draft EIS 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 project results, project impacts, data gaps, etc. on both the project and watershed levels. The BPA's watershed management program should thus include a clear monitoring and evaluation component.

Finally, the draft EIS should address how it will mesh with other current EISs in the region, such as the USFWS/NMFS/BPA's hatchery EIS and the USFS/BLM's 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.

We appreciate the BPA's efforts to coordinate its watershed management program projects in a consistent and comprehensive manner. We also appreciate the opportunity to comment on the draft EIS, and your agreement to receive and consider our comments after the deadline requested in the draft EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Holmes Gaar". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Elizabeth Holmes Gaar, Director
Habitat Conservation Program



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

April 17, 1997

REPLY TO
ATTN OF: ECO-088

Eric N. Powers
Bonneville Power Administration
P.O. Box 12999
Portland, OR 97212

Re: BPA Watershed Management Program Draft Environmental Impact Statement (DEIS)

Dear Mr. Powers:

The U.S. Environmental Protection Agency (EPA) has received the **BPA Watershed Management Program Draft EIS** for review in accordance with our responsibilities under the National Environmental Policy Act and under Section 309 of the Clean Air Act. Based on a limited review of the document, we do not foresee having environmental objections. However, we do wish to submit the enclosed comments.

If you have any questions or would like to discuss these comments further, please contact Elaine Somers in Seattle at (206) 553-2966.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Parkin", written over a circular stamp or mark.

Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosure

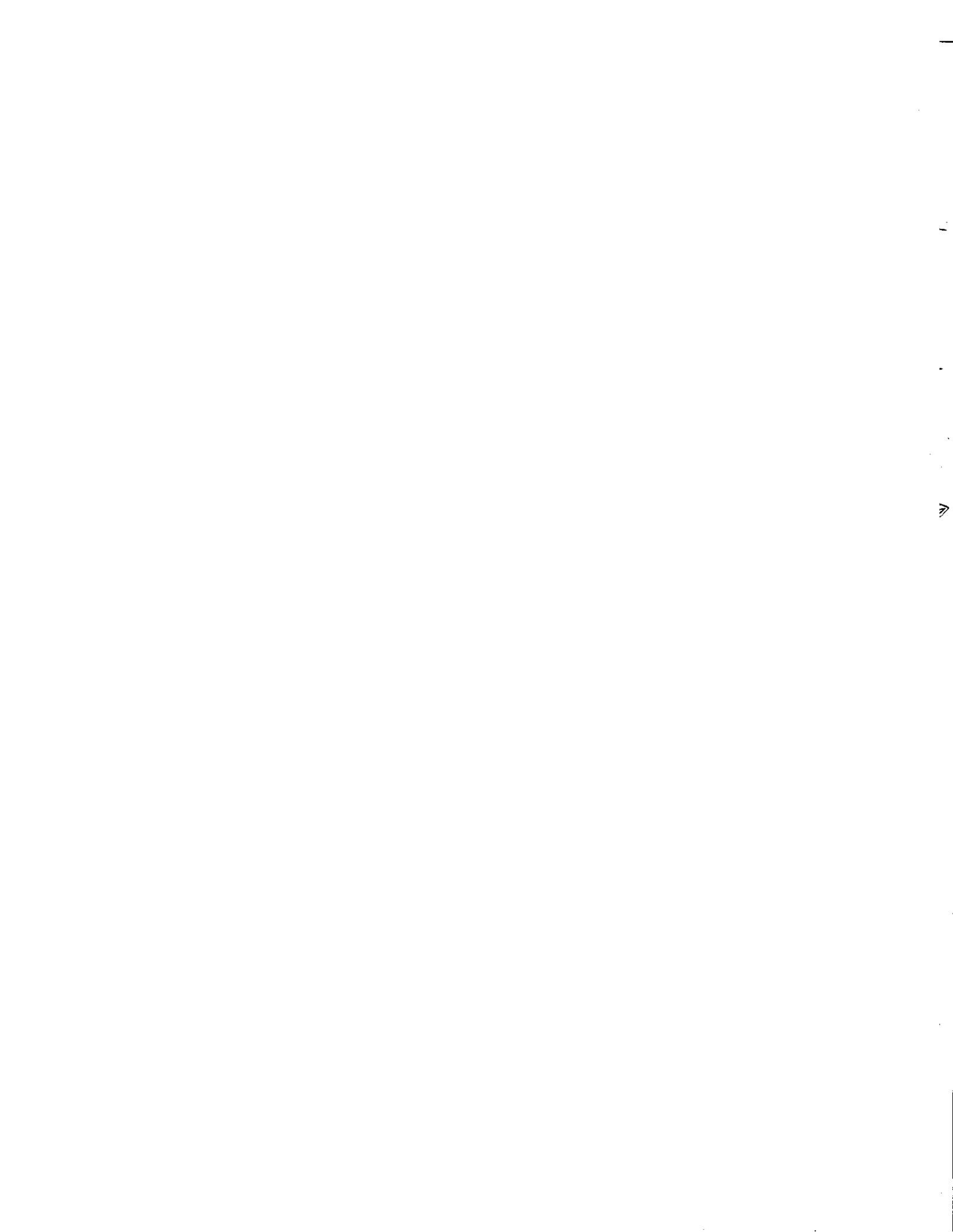
**U.S. Environmental Protection Agency
Region 10**

Comments on BPA's Watershed Management Program Draft EIS

- **It is important to use a watershed/landscape assessment as a basis for making project proposals and decisions.** Our understanding is that BPA intends to use a watershed approach to project approvals. As the EIS is written, it is not clear 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. We recommend that you clarify the intent of and process for your watershed approach in the EIS.

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.

- **Not all projects should be categorically excluded from environmental assessment under NEPA.** As discussed above, in implementing a watershed approach, a watershed assessment should be completed, which identifies priority areas for attention. Participants should reach agreement on certain actions based on the watershed/landscape assessment, thereby making individual NEPA processes unnecessary. However, there are certain types of projects that 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 was converted from open canals to a pipeline.
- **Decrease emphasis on use of pesticides and herbicides.** To prevent pollution of soil and water, protect fish, wildlife, and humans, and to foster overall ecosystem 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, the Balanced Approach, reflect infrequent use rather than moderate use of pesticides and herbicides (Table 2-1).
- **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.



Bonneville Power Administration
PO Box 3621 Portland, Oregon 97208-3621

DOE/BP-2994 JULY 1997 800

