

United States Government

Department of Energy

Bonneville Power Administration

memorandum

DATE: September 22, 2004

REPLY TO
ATTN OF: KEC-4

SUBJECT: Supplement Analysis for the Watershed Management Program EIS (DOE/EIS/SA-185)

TO: Mr. Ben Zelinsky
Fish and Wildlife Project Manager - KEWL-4

Proposed Action: Grays Bay Estuary Habitat Rehabilitation Project

Project No: 2003-011-00

Watershed Management Techniques or Actions Addressed Under This Supplement Analysis (See App. A of the Watershed Management Program EIS): 1.13 Culvert Removal/Replacement to improve fish passage; 1.17 Rearing habitat enhancements; 2.1 Maintain healthy riparian plant communities; 2.2 Plant/protect conifer in riparian areas for thermal cover; 2.15 Acquisition of sensitive riparian resources

Location: Grays Bay, Wahkiakum County, Washington

Proposed by: Bonneville Power Administration (BPA), Lower Columbia River Estuary Partnership (LCREP), Columbia Land Trust (CLT), and Ducks Unlimited (DU)

Description of the Proposed Action: BPA is proposing to fund a fish habitat rehabilitation project in the Grays Bay Estuary and on Seal Slough, in Wahkiakum County, Washington in collaboration with LCREP, CLT and DU.

The project is part of a regional effort in which the purpose is to restore the health of the Columbia River estuary and recover declining populations of salmon and steelhead. This particular project focuses on three separate parcels of land. The Kandoll Farm, the Johnson Property, and the Deep River parcel. Overall, this project will accomplish the following:

- Permanently protect 880 acres of habitat lands, including spruce swamp forested wetlands, inter-tidal floodplain channels and emergent/Scrub-shrub wetlands;
- Restore floodplain connectivity to 445 acres of tidal backwater, riparian and wetland-forested habitat;
- Restore over 300 acres of potential salmonid rearing habitat;
- Enhance approximately 3.0 miles of riparian shoreline; and
- Protect three bald eagle nests and over 100 acres of potential marbled murrelet nesting habitat.

Analysis: The NEPA compliance checklist for this project was completed by Ian Sinks with the CLT and meets the standards and guidelines for the Watershed Management Program Environmental Impact Statement (EIS) and Record of Decision (ROD).

The Endangered Species Act (ESA) listed species that may occur in the general vicinity of the project area are: Bald eagle, marbled murrelet, bull trout, chinook salmon, steelhead, chum salmon. For the anadromous fish species, BPA has determined that, if conducted in accordance with the applicable terms and conditions identified in the ESA Consultation Biological Opinion (BO) and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for BPA's Habitat Improvement Program (HIP), the Grays Bay Estuary Habitat Rehabilitation Project meets the requirements of consistency and no further consultation is required. BPA and DU have received a Hydraulic Project Approval from Washington Department of Fish and Wildlife to extend the instream work window to October 31, 2004; Mr. Dan Guy, Southwest Washington Branch Chief of Habitat Conservation, approved the Minor Modification of the instream work window extension as allowable under the HIP BO (See attached HIP BO forms and Terms and Conditions).

Though the entire Columbia River is a migration corridor for bull trout, there are no bull trout in any Lower Columbia tributaries downstream from Longview, WA. Therefore, the only USFWS ESA-listed species of concern is bald eagle. For the Johnson Property, USFWS granted concurrence with a 'may affect, not likely to adversely affect' determination on July 25, 2003. For the Deep River parcel, USFWS granted concurrence with a 'may affect, not likely to adversely affect' determination on September 20, 2004 (See attached concurrence memos).

In compliance with Section 106 of the National Historic Preservation Act, Applied Archaeological Research (AAR) completed on-site inventories of the parcels between March 29 and April 1, 2004. The project areas and APE have been previously disturbed from agricultural practices and tidegate maintenance/replacement. Tidegate removal would restore historic and natural tidal influence causing fluctuating water inundation. The AAR report was sent to the WA SHPO in June 2004. Nicole Stutte, BPA's Archaeologist, submitted supplemental information in September 2004. On September 9, 2004, Mr. Rob Whitlam, WA State Historic Preservation Officer, concurred with our findings (See attached SHPO concurrence memo). In the unlikely event that archaeological material is discovered as part of this project, an archaeologist should be notified immediately and work halted in the vicinity of the finds until they can be inspected and assessed.

Standard water quality protection procedures and Best Management Practices will be followed during the implementation of the Grays Bay Estuary Rehabilitation Project. No construction is authorized to begin until the proponent has obtained all applicable local, state, and federal permits and approvals including water right modifications. Also, the project's established Erosion and Pollution Control Plan must be adhered to (See attached Erosion and Pollution Control Plan).

Public Involvement has continually occurred as part of the Grays Bay Estuary Rehabilitation Project. The project has been a collaborative effort between the landowners, BPA, Lower Columbia River Estuary Partnership, Columbia Land Trust, and Ducks Unlimited. CLT has worked with the County to establish a stakeholders committee to help plan and review the project. The committee meetings were open to the public and provided a forum for discussion and community input. Additionally, articles have been written in the local newspaper regarding the project and CLT conducted two days of outreach at the August 2004 Wahkiakum County Fair. Comments received from the public have been largely supportive regarding the habitat rehabilitation project.

Findings: The project is generally consistent with Section 7.6A.2, 7.6B.3, & 7.8E.1, of the Northwest Power Planning Council's Fish and Wildlife Program. This Supplement Analysis finds 1) that the proposed actions are substantially consistent with the Watershed Management Program EIS (DOE/EIS-0265) and ROD, and, 2) that there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Kelly Mason

Kelly Mason
Environmental Specialist

CONCUR:

/s/ Thomas C. McKinney

Thomas C. McKinney
NEPA Compliance Officer

DATE: September 24, 2004

Attachments:

NEPA Compliance SA Checklist
WA SHPO Concurrence letter
ESA compliance documents for NOAA and USFWS (including HIP BO forms)
Hydraulic Project Approval
Pollution and Erosion Control Plan
HIP BO 120-day Monitoring Form

cc: (with attachments)

Mr. Ian Sinks – CLT

Mr. Chuck Lobdell – DU

Mr. Matt Burlin – LCREP