Memorandum

DATE: October 15, 2002

REPLY TO ATTN OF: KEC-4

SUBJECT: Supplement Analysis for the Watershed Management Program EIS (DOE/EIS-0265/SA-96)

TO: Ron Morinaka (KEWU – 4)
Fish and Wildlife Project Manager, COTR

Proposed Action: Grave Creek Channel Stabilization Project

Project No: 199500400

Watershed Management Program (See App. A : Available Management Techniques):
1.6 Install Large Woody Debris Structures; 1.7 Install Other Habitat Complexity Structures; 1.9 Structural Bank Protection using Bioengineering Methods; 1.16 Spawning Habitat Enhancements; 1.17 Raring Habitat Enhancements; 2.1 Maintain Healthy Riparian Plant Communities.

Location: On Grave Creek, located about 12 miles southeast of the town of Eureka, Montana, within T. 38 North, R. 25 West, Sect. 12, 13, 14, in Lincoln County

Proposed by: Bonneville Power Administration (BPA) and the Montana Department of Fish, Wildlife and Parks (MFWP)

Description of the Proposed Action: BPA proposes to fund MFWP to construct a channel stabilization project, which would restore and stabilize habitat to about 4,300 feet of Grave Creek by realigning and shaping the channel, installing log and rock vanes and root wads throughout the project, and planting native vegetation along the riparian corridor to stabilize the banks.

The proposed project will require use of a 320 class track excavator, a D7 class bulldozer, and a dump truck. Equipment access will be accomplished via existing roads located within the project area. Minor road improvements may be necessary to permit access to the stream channel. After project completion, all road access will be removed via road reclamation. The project will be constructed between September 1, 2002 and November 15, 2002, during the time when Grave Creek flows are at base level. Construction is expected to last no longer than three weeks during this period.

Grave Creek is one of the most important bull trout spawning streams in the Tobacco River drainage. This stream also provides water for westslope cutthroat trout habitat, agriculture, and other riparian-dependent species. This stream is currently on the Montana Water Quality Limited Segment List as an impaired stream. The state has proposed that Grave Creek be a high priority for Total Mean Daily Load Allocation (TMDL). Numerous reaches
of the stream exhibit depositional features and associated lateral erosion. Libby Creek has been degraded in the past by logging in the upper reaches, livestock grazing practices, channelization, and other land management activities that have contributed to instability of the channel. Grave Creek is currently unable to adequately transport stream flow and bedload supply and still maintain a stable channel.

Following construction, the project will be monitored to determine if objectives are met. Pre- and post-monitoring data collected to date within the project area include 13 permanent stream channel cross sections located in, above, and below the proposed project, a longitudinal profile, and numerous photo points. These monitoring activities will allow the determination how channel morphology and dimension change in time.

**Analysis:** The compliance checklist for this project was completed by Jim Dunnigan of the MFWP and meets the standards and guidelines for the Watershed Management Program Environmental Impact Statement (EIS) and Record of Decision (ROD) (July 30, 2002).

This project is the second restoration effort on lower Grave Creek and is intended to compliment present and future restoration in this drainage. Short-term impacts of the project largely relate to ground disturbing activities that would result from channel restoration, bank sloping, vegetation establishment, and associated work. In the long-term, the proposed project is expected to improve fish and wildlife habitat, aesthetics, and water quality within the project area and should also increase trout populations. The proposed project activities would provide for greater channel stability and reduce sediment loading, resulting in a healthier habitat for aquatic life. Planting riparian vegetation along the stream margin would create more diverse habitat for riparian dependent wildlife.

The one listed ESA species that could be present in the project area is the Federally-threatened bull trout (pers. com., Rox Rogers, USFWS, Aug. 6, 2002). The USFWS has issued a section 6 (c)(1) bull trout Biological Opinion authorizing take for recovery-related purposes throughout the range of this species, including actions such as habitat restoration. Such take of bull trout is exempted under the existing cooperative agreement between MFWP and USFWS under Section 6 of the ESA. Individual projects that are planned by MFWP and that fall under the USFWS’s recovery program are permitted annually under Section 6. A copy of the Biological Opinion is in the project file.

BPA initiated consultation with the State Historic Preservation Office (SHPO), the Confederated Salish and Kootenai Tribes of Flathead, and Kootenai Tribe of Idaho, via letters to them dated July 26, 2002. A pedestrian cultural resource inventory was conducted at the project on August 13-16, 2002 by Mr. Galen R. Burgett, archaeologist with the USFWS, and a total of about 90 acres were examined. From the survey, Mr. Burgett determined that there were no potentially eligible or eligible cultural properties in the Area of Potential Effect; the hydrologic/geomorphic environment of the project area has extremely low probability of buried cultural/historic properties; most of the project work would be instream activities; and proposed instream activities are low impact disturbance to the sediments and would be restricted to the immediate vicinity of the stream banks. In its undated letter (envelope postmarked Oct. 9, 2002), the State Archaeologist/Deputy State
Historic Preservation Officer responded with acceptance of the CR Report (Attachment 1) without mitigative measures or conditions.

Standard in-channel water quality protection procedures will be followed during the implementation of the project. Applications for the following have been filed with the respective agencies: a section 404 application under the Clean Water Act permit from the U.S. Army Corps of Engineers, a 3A permit from the Montana Department of Environmental Quality, a 318 permit from the Lincoln County Conservation District; and a flood plain permit from the Lincoln County Planning Department. All permits will be acquired prior to initiating ground-disturbing work on this project.

The proposed project will be constructed on private property, and project planning has included consultation and dialogue with a variety of stakeholders: the USFWS, Kootnai River Network, Montana Department of Environmental Quality, National Fish and Wildlife Federation, the Steele-Reese Foundation, the Montana Community Foundation, the Montana Trout Foundation, the Cadeau Foundations, Lincoln Conservation District, U.S. Army Corps of Engineers, Montana Department of Environmental Quality, State Historic Preservation Office, and Natural Resources Conservation Service. The MFWP has been forthright in soliciting public input to the project. The MFWP recently issued their draft environmental assessment for comment on the project.

**Findings:** The project is generally consistent with the Northwest Power Planning Council’s Fish and Wildlife Program, as well as BPA’s Watershed Management Program EIS (DOE/EIS-0265) and ROD. This Supplement Analysis finds that: 1) implementing the proposed action will not result in any substantial changes to the Watershed Management Program that are relevant to environmental concerns; and 2) there are no significant new circumstances or information relevant to environmental concerns and bearing on the Watershed Management Program or its impacts. Therefore, no further NEPA documentation is required.

**CONCUR:**

Carl J. Keller Thomas C. McKinney
Fish and Wildlife Biologist NEPA Compliance Officer

Attachments:
SHPO letter of acceptance postmarked October 9, 2002

cc: (w/ attachments)
Mr. Jim Dunnigan, MT Department of Fish, Wildlife and Parks, 475 Fish Hatchery Road, Libby MT 59923
Mr. Rox Roger, U.S. Fish and Wildlife Service - Montana Partners Program, 780 Creston Hatchery Road, Kalispell, MT 59901