

# **Public Comment Summary**

Summarized from Public Comments to the  
Salmon Creek  
Draft Environmental Impact Statement

**Bonneville Power Administration**  
**December 2004**

# Public Comment Summary

BPA held one public meeting on September 28, 2004 to receive public comments on the Draft Environmental Impact Statement. The official close of comment ended November 9, 2004; comments submitted up until November 24, 2004 are included in this summary. BPA recorded the comments presented at the public meeting and received 67 pieces of correspondence and documented telephone calls related to the Draft EIS.

Many letters contained more than one comment. Comments were categorized and coded by section of the Draft EIS, with the exception of comments about the process, mitigation and miscellaneous comments. Those categories are at the end of this summary.

## 1. Purpose and Need

### *Summary*

Comments in this category include both support for the project and the need to enhance fish runs, and opposition to the project. Many questioned the likelihood of having enough water for both fish and existing irrigators. Some want the objectives of the project clarified. Some questioned the motives of the proponents or supported the need for BPA to fund projects such as these. Some questioned whether there were other projects that might be more effective or serve the same need as this proposal. Many were concerned about funding relative to other projects in the region, and also in respect to who should fund the project.

### *Sample Statements*

Comment Log Number	Issue Code	Comment
SCP2-015-03	1c	The purpose and need statement seems to favor alternatives that enhance the Okanogan Irrigation District's water supply. Listing the OID needs first implies that the OID's needs are of primary importance.
SCP2-015-04	1d	Enhancing fish habitat should be at least as important a need as the OID's need for water.
SCP2-015-07	1f	BPA must satisfy the ESA and the Northwest Power Act, which focus on mitigating measures that would enhance fish habitat and wildlife.
SCP2-016-05	1g	The historic Salmon Creek fishery was eliminated by the Bureau of Reclamation and OID and its restoration should not be primarily financed by Okanogan County electric ratepayers (neither directly through increased subsidized electricity for pumping Okanogan River water nor indirectly through higher BPA rates).

SCP2-016-06	1h	BPA has the responsibility to ratepayers to accomplish salmon mitigation as efficiently as possible. The Salmon Recovery Funding Board should find a more effective place to invest BPA ratepayers' dollars than the mostly waterless Salmon Creek.
SCP2-024-010	1i	This project was not considered by the Power Planning Council to be economically feasible in the past. What exactly has changed to make this feasible now?
SCP2-032-01	1l	BPA must be responsible and accountable for the expenditures to restore the fisheries and it must focus on the projects that demonstrate the best benefits to cost ratio.
SCP2-037-03	1m	Give the Colville Tribal Hatchery more time to lessen the need for this project.
SCP2-040-039	1o	Can BPA refuse to spend so much money? Get elected officials to take back some of the power of regulatory agencies.
SCP2-058-02	1p	The OID kneeled under the threat of the ESA and is not a free and voluntary supporter of the preferred alternative.
SCP2-058-03	1q	No one supports this other than tribal members. This is the "poster child" for what is wrong with salmon recovery effort.
SCP2-058-026	1r	You must discuss impacts of Conconully Dam, related court decisions and impacts of loss of stored irrigation water.
SCP2-067-01	1s	Support purpose and need.
SCP2-052-09	1t	Need a clear statement of goals of the alternatives be included in the EIS (passage for steelhead and chinook, or just one).
SCP2-056-023	1u	Modern tribal members no longer have basic physical subsistence at the heart of their desire for restored fish runs.
SCP2-056-024	1v	OID's participation in project is to protect certainty of water supply because without it there is serious doubt of long-term viability for the OID or its users.

## 2. Alternatives

### **Summary**

The alternatives received many comments. There were questions, support, and opposition for each alternative. Some support none of the alternatives. Many questioned that fish were ever in Salmon Creek. Many commentors wanted a cost:benefit analysis done for all the alternatives, using current power and construction costs.

Alternative 1 received support, suggestions for modifications and questions.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-003	2a1	Support; will cost less; will not take away water for irrigation; only if water rights are guaranteed.
SCP2-019-05	2a2	I need more information about the pumping station.
SCP2-029-02	2a3	Modified Alt. 1 to convert Salmon Creek Middle Reach to a salmon hatchery; work on the lower reach would be destroyed when the reservoir become overfilled. The Middle Reach offers a relatively stable environment in which fish can thrive.
SCP2-046-01	2a4	Include the lower 4.3 miles of Salmon Creek in the proposal for stream rehabilitation.
SCP2-016-03	2a5	This alternative is a partial solution to restoring salmon. Would have a poorer cost:benefit ratio than Alternative 2.
SCP2-030-04	2a6	I hear no salmon used that creek.
SCP2-036-011	2a7	This alternative is in direct opposition to a publication called the Conceptual Rehabilitation Plan for Lower Salmon Creek, Washington prepared for the Colville Confederated Tribes.
SCP2-036-020	2a8	This alternative would move the pump station out of the Omak City limits and would result in a loss of utility dollars (\$5,539.28) to the City of Omak. This was not addressed.
SCP2-040-05	2a9	Is the land available for the new pump station?
SCP2-040-020	2a10	What will we do with boulders removed from alluvial fan?
SCP2-040-044	2a11	If channel rehabilitation is done, include the removal of alluvial fan; How will the lower channel be maintained without reforming the alluvial fan.
SCP2-050-07	2a12	Filtering water may not be necessary if flow augmentation is needed for steelhead only. This should be discussed further.
SCP2-052-08	2a16	Reclamation has concluded that the use of the IOD Canal as a settling basin would pose an additional operations and maintenance challenge.
SCP2-052-010	2a17	Modify feeder canal upgrade description to include use of existing alignment for the entire length, add a fish screen at the entrance.
SCP2-052-013	2a18	Responsibility for replacing the feeder canal rests with the OID, not Reclamation.
SCP2-052-014	2a19	State where excavated material will be disposed of.

Alternative 2 received support, suggestions for modifications and questions.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-006	2b1	Support
SCP2-015-05	2b2	This alternative focuses on enhancing the OID water supply, instead of focusing on repairing the damaged fish habitat (9 pages vs. 1-1/2 pages).
SCP2-016-02	2b3	This alternative is the only alternative with the capability of restoring the river ecosystem and fishery, it would be extremely expensive and would not pass any cost:benefit analysis.
SCP2-067-03	2b4	How does increasing the flow capacity in the feeder canal fit into the purpose and need. The FEIS should include more detail and any impacts that would result.
SCP2-052-023	2b5	Explore adding a second point of diversion for a portion of the Salmon Creek rights so that the full 35 cfs would not be subject to restriction for minimum flows.

Alternative 3 received support, suggestions for modifications and questions.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-014-04	2c1	Does not make sense because nothing will be done to the lower reach of Salmon Creek; how will fish get over the 8 ft. high fan at the mouth of Salmon Creek in the Okanogan River.
SCP2-016-04	2c2	This would have the best cost:benefit ratio, but is unacceptable socially and might be challenged under the Farmland Protection Policy Act.
SCP2-030-06	2c3	How much will it cost to purchase water rights? Where will the money come from?
SCP2-020-03	2c4	Purchasing water rights is only a short-term solution; would limit the number of acres that can be irrigated.
SCP2-041-07	2c5	You would still have a passage issue with this alternative; boulder fan is an impediment, not a complete barrier.
SCP2-067-02	2c6	Add removal of the gravel bar to this alternative.
SCP2-052-01	2c7	This alternative would significantly reduce the acreage irrigated within the OID, which runs counter to the authorized purpose of the project. Irrigation was and is the sole authorized purpose of the Okanogan project and this purpose would be substantially compromised under Alternative 3.

The No Action Alternative received support and a question.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-005	2d1	Support
SCP2-008-03	2d2	Support if water rights cannot be guaranteed through Alternative 1.
SCP2-023-02	2d3	Who is responsible for the cost of fixing the feeder canal in this alternative since we are only getting 1/3 of the water through the ditch that we are allowed?

New alternatives were suggested by many commentors including using more water conservation, using discharge water from sewage plants, using a hatchery instead, buying water rights, and expanding the list of alternatives.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-008-02	2f1	Pump discharge water from the Omak and Okanogan sewage treatment plants into the Okanogan Irrigation System during the irrigation season and on into the Duck Lake Storage system during non-irrigation season.
SCP2-045-02	2f2	A hatchery would be much more beneficial.
SCP2-045-03	2f3	Colville Tribe should pay for this project with the electrical proceeds.
SCP2-046-02	2f4	Include water conservation assistance for small landowners with small pasture and alfalfa plots.
SCP2-015-012	2f5	Address the potential for conservation measures (rainwater catchments with tertiary and secondary treatment or improvements in irrigation efficiency) to avoid "unavoidable" impacts to Okanogan River streamflow.
SCP2-016-07	2f6	Expansion of streambank restoration and revegetation efforts, purchase of water rights, and support of efforts to increase irrigation efficiency can be expected to yield better cost:benefit ratios than large scale pumping projects (i.e., other SRFB projects).
SCP2-035-010	2f7	Include the option of trapping the fish and releasing them at the mouth of Salmon Creek. It is almost impossible to keep the lower reaches open to fish passage year after year.
SCP2-040-01	2f8	What about channeling water from Omak and Okanogan sewage treatment plants to OID? To Shellrock?
SCP2-040-045	2f10	Look for opportunities to increase storage in Conconully Lake, Salmon Lake, and the Johnson Creek system.
SCP2-041-01	2f11	Can you water lower creek without canal upgrade?

SCP2-050-09	2f13	The list of alternatives is too narrow. Consider an alternative that provides timed flows for steelhead passage and minimal passage and riparian improvements would address potential ESA concerns for existing steelhead populations and would allow significant opportunities for increasing their productivity at a far lower cost to the OID and/or BPA. The efforts undertaken by the Umatillas on the Umatilla River could provide a model for this type of project.
SCP2-050-010	2f14	Increased flows from moving the City of Okanogan water right from Watercross Springs to a well could reduce the level of pumping necessary.
SCP2-051-03	2f15	Consider construction and location of facilities on the east side of the river, since the group most interested lives on the east side.
SCP2-055-03	2f16	Aren't there other possible projects for the river system that are more feasible and cost effective? Shouldn't the river be restored first?
SCP2-063-07	2f17	Continue to pump at the Omak station, update the canal system to pipe to make it more efficient and convert some Irrigation District users to wells, all of which would leave more water in Salmon Creek.
SCP2-058-022	2f19	Where are other alternatives in the Okanogan watershed?
SCP2-067-06	2f21	Consider feasibility of implementing measures in the FEIS that would improve the streambank and riparian area in the middle reach of the Salmon Creek between the former town of Ruby and the OID diversion dam.

### Comparison of Alternatives

There were many comments about the need for revised cost estimates, cost:benefit analyses for each alternative, questions about alternative details, and comments that all the action alternatives cost too much. Many questioned who should pay for the project or had suggestions about who should pay.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-001-02	2g1	Action alternatives cost too much; question cost effectiveness.
SCP2-033-04	2g2	Orchardists and farmers are getting a very good deal from this draft proposal, even a free ride.
SCP2-033-05	2g3	Have agriculture pay something; it is more equitable to other taxpayers.
SCP2-034-08	2g4	All of the people most affected oppose your plans. If the plan were a good one, that would not be the case.
SCP2-045-01	2g6	Give more consideration to the cost/benefit ratio; there are much more needy areas for this amount of money.
SCP2-057-02	2g7	If we do anything, it would add more economic stress to the area.
SCP2-015-02	2g8	The alternatives focus on benefiting the OID, instead of ensuring that the fish habitat and near-by Okanogan River will not be impacted by the project.

SCP2-036-03	2g9	Use today's power rates to figure power costs; power rates quoted are wrong and outdated.
SCP2-017-07	2g10	Will cost of O&M for OID increase with the alternatives despite the promises; if the costs are needed to be covered by the irrigation users of OKD, it is very likely that many would not be able to maintain their businesses.
SCP2-036-02	2g11	The DEIS is inaccurate because it uses 1999 cost estimates instead of 2004 cost estimates; costs could be much more than given; state how determined; doesn't include all costs.
SCP2-036-018	2g12	Include cost of planting smolts in Salmon Creek.
SCP2-036-023	2g13	Include cost of removing alluvial fan repeatedly over time.
SCP2-040-04	2g14	Include cost of easement – landowner access into channel rehabilitation.
SCP2-040-022	2g15	Give cost of Alternative 4 to more equally compare alternatives.
SCP2-041-06	2g18	Use similar assumptions when doing cost assessments for alternatives.
SCP2-055-04	2g19	Who benefits from the fishery, all people?
SCP2-056-07	2g20	How many fish by species is estimated to be produced by each alternative and the cost on a per pound or per fish basis; note difference in estimated population between the tribe and the Independent Scientific Review Board.
SCP2-058-021	2g21	Compare to other possible projects in the Columbia ESU to find the most efficient project.

A few commentors do not support any alternative.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-013-01	2h	Do not support any alternative.

## **3. Water Quantity**

### **Summary**

The quantity of water available for all users was a concern for many. Some question whether fish and irrigators will both receive the water they need, especially in drought years. Many suggested that the water data used was outdated, did not include drought years and should be redone in the Final EIS. Many suggested that there is not enough water now and will not be with the proposal. Some are concerned that the project will lower the water so that recreation is affected or existing water right holders would be affected. Many want more information about water levels including existing well water levels.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-009-01	3a	Conconully Reservoir and Conconully Lake will not fill if the project takes water out during January, February, March and April when these water bodies are at their lowest.
SCP2-009-02	3b	Project will affect recreation.
SCP2-013-02	3c	Study how the project would impact permit holders below the OID pump station during low water seasons and provide more information.
SCP2-023-03	3d	The lake has never been to full capacity since the lake was pulled down for dam inspection.
SCP2-034-03	3e	Give more information about the effect of your plans on both the upper and lower lakes.
SCP2-034-04	3f	Appendix D-2 suggests a lake level which is not realistic and hasn't been seen in years. The current level isn't even on your chart. You must take actual water years, both high and low water, and subtract the actual water needs for this project from irrigation needs for each alternative.
SCP2-039-03	3g	There may not be enough water for both irrigation and fish, especially in the dry years such as we have had in the past. Contrast irrigation rate of withdrawal to fish flow rate of withdrawal; check your stream flow records when flows on the north fork were 0 cfs.
SCP2-011-01	3h	Salmon Lake would be reduced to a stream/mud flat. Preserve Conconully Reservoir.
SCP2-014-02	3i	How much water will be returned to the Okanogan River from Salmon Creek? How could you state there would be no impact if there are losses on Salmon Creek?
SCP2-017-01	3j	The models used in the Draft EIS use an average of all water years. Use actual figures consecutively over the past 50 years of high and low water, month to month and how the increase use of water in March, April and May for instream flows would affect the Reservoir and Salmon Lake levels on any given year.
SCP2-017-02	3k	Show how much water would be taken out of the Reservoir versus how much would be taken out of Salmon Lake and how this would effect the Salmon Lake and Reservoir level any given month of any given year using actual data from actual years both high and low water; how much water will be taken from the reservoir vs. Salmon Lake.
SCP2-017-03	3l	Show 2001-05 actual elevation numbers and how that would be affected by the condensed releases in March, April, May.
SCP2-017-06	3m	Show a model of how each foot of elevation drop results in exposure of how much shoreline and at what point it hinders launching boats for Salmon Creek and the Reservoir. This needs to be compared to actual water years especially the last 5-15 years.
SCP2-024-01	3n	How will releases during the winter months not cause the same problems of low lake levels we see in the summer?

SCP2-020-01	3o	Concerned about water rights; does OID have the ability to increase its volume of water to be pumped from the river; what are impacts to other legal water users on the river.
SCP2-020-02	3p	What impacts will there be to habitat during low flows and meeting WAC minimum flows; include a plan for how water will be managed for irrigation and instream flows should there not be enough water in the Okanogan River to pump; protect irrigators' water rights.
SCP2-020-09	3q	What will the impacts be to the Duck Lake aquifer with "just" a 2 percent maximum increase of irrigation water use from Duck Lake.
SCP2-027-02	3r	What if Canada holds more water for their use? The DEIS does not address any agreement between the US and Canada guaranteeing Okanogan River flows.
SCP2-036-01	3s	The DEIS doesn't address increased sediment levels in the Conconully Reservoir which will result in decreased storage over time.
SCP2-040-030	3v	What will happen with City's water right at Watercress Springs? Is it still available to contribute to flows?
SCP2-040-036	3w	They used to fill Salmon Lake first. Procedures changed after OID took over canal and the levee was improved.
SCP2-040-048	3x	What effect will there be on wells in town due to piping the canal?
SCP2-056-013	3z	Concerned about the assumptions used in the DEIS about Washington State Department of Ecology's review of water rights. They may not be correct in terms of reductions for OID. Concerned that WSDOE will curtail or stop pumping altogether.

## 4. Water Quality

### Summary

Commentors asked questions about the temperature of the water, historical flows, sedimentation and other issues.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-015-013	4a	For historical flows for the Okanogan River, what years did the data cover and what statistical methods were used? References and methods should be available for review.
SCP2-015-014	4b	Explain and support with documents or studies the professional judgment used to state that flows would be sufficiently low to avoid significant erosion and sedimentation, bank failure and channel widening.

SCP2-015-016	4c	How did you determine that impacts associated with stream rehabilitation would be minor and short term? Couldn't the impacts be cumulative? Describe how you arrived at this conclusion. Include for Alternative 2 also.
SCP2-030-05	4d	Who will remove waste and how is it to be paid for?
SCP2-037-06	4e	Would taking water from the bottom of the reservoir affect the temperature of the lake; will it affect the trout fishing and economy of Conconully?
SCP2-041-04	4f	Is there a dissolved oxygen or temperature problems in the reservoirs?

## 5. Wetlands and Vegetation

### Summary

Commentors were concerned about noxious weeds, revegetation, monitoring and rehabilitating streambanks.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-002	5a	Need to address noxious weeds and their impacts; develop non-native noxious weed control plan including surveying, mapping, control/treatment measures, revegetation practices and monitoring for 10-15 years.
SCP2-040-031	5b	How can I do something about the streambanks along my property if it isn't rehabbed? (lower creek)
SCP2-040-032	5c	I would like to see the lower creek beautified and improved.

## 6. Wildlife

### Summary

Commentors were concerned about wildlife other than fish.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-034-01	6a	Look at the effect on the thousands of ducks who use the reservoir as a nesting and feeding place on their northern and southern migration.
SCP2-036-010	6b	Address shoreline changes as it affects wildlife.

## 7. Fisheries

### Summary

Commentors are skeptical that steelhead and chinook were ever in Salmon Creek and would like more information to provide proof. Some question whether salmon are really endangered. Some question whether there would be enough water in Salmon Creek for salmon and whether the salmon would return to Salmon Creek if there is enough water. There were suggestions of research to review. Some had questions about the Endangered Species Act and liability for agencies.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-040-051	7a	Is there proof that salmon and steelhead were in lower Salmon Creek; that it will support steelhead?
SCP2-019-02	7b	Please include information on public fishing.
SCP2-023-01	7c	How will steelhead and spring chinook affect the existing fisheries in the Okanogan River and the portion of the Columbia River that is now open in Okanogan County; the DEIS is not complete because it does not include a study on how the project will affect Kokanee and trout populations.
SCP2-039-05	7d	Salmon aren't really that endangered, if they were, the government wouldn't allow the many fishnets strung along the Columbia River.
SCP2-011-07	7f	Fish are not worth the cost.
SCP2-036-013	7g	The DEIS is not complete because it does not address that in 2002 hundreds of steelhead smolts died on the shores of Salmon Creek because not enough water could be flushed to them given the condition of the streambed.
SCP2-036-014	7h	The DEIS is inaccurate because it included Chinook and Chinook have not been proven to be able to survive in the Okanogan; provide evidence that elevated temperatures in the mainstem Okanogan is not a relevant concern; stated temperatures do not reflect reality; No know records that spring chinook in Salmon Creek; provide reference "Craig and Suomda 1941" and make available.
SCP2-041-011	7i	Implementing Alternatives 1, 2 or 3 would lessen ESA liability.
SCP2-054-04	7j	The wide range of fish return projections seems to suggest that either no one has a clear idea how many fish would return or that no one wants to say how low the return averages are likely to be. There is real doubt that a sustainable population could be established without major expense. The 100 percent estimate of increased steelhead returns is unsupported with known facts. Estimate how many total number of adult fish the project will add to the Columbia River system. Estimate how long it will take for runs to be self-sustaining.
SCP2-056-08	7k	An objective review of the data used to derive the range of fish returns estimates should suggest statistical norms, what are the most likely return numbers.

SCP2-056-09	7l	Why count smolt production over adult returns? Is this a way to obscure questions about costs, sustainable runs?
SCP2-056-010	7m	There is no danger of ESA listing for chinook because the Okanogan River and its tributaries are not considered a viable ESU for spring chinook.
SCP2-056-011	7n	There is no data cited to suggest whether genetic or environmental factors are the principle reasons for return timing.
SCP2-061-04	7o	How will ocean conditions affect returning salmon.
SCP2-065-02	7p	Won't returning salmon just go up Okanogan River and not turn left to Salmon Creek because Salmon Creek will smell and taste just like the Okanogan River?
SCP2-058-08	7q	This would introduce an exotic fish (spring chinook) into this system.
SCP2-059-03	7s	Brown trout and bull trout are in the Okanogan River Watershed.

## 8. Land and Shoreline Use

### **Summary**

Commentors are concerned about access and other impacts to existing buildings on the shoreline. Also, one feels the dike is not an approved dike.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-036-09	8a	Please include information about access to shoreline.
SCP2-040-028	8b	Concerned about impacts to business (D&B Auto) and that there is not enough room on the property for the pump.
SCP2-040-029	8c	Corps of Engineers' dike is not an approved dike. Pump would be built on this unapproved dike.
SCP2-058-018	8d	Believe that 19 percent not 30 percent of the county is in private ownership. Check with the county.

## 9. Visual Resources

No comments were received about visual resources.

## 10. Socioeconomics

### **Summary**

Many suggested that the proposal would have impacts on the local businesses and the tourist trade and that this should be included in the Final EIS. Some worried that the reservoirs would be lowered and that would affect recreation and also residents. Negative impacts to property values was also a concern. A commentor acknowledged that construction would bring positive

impacts to the local community. Another was concerned that noise from the proposed pump could affect property values to nearby properties.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-009-03	10a	Need to study the impacts on tourism; include information attached in a study about drought conditions in the past.
SCP2-010-01	10b	Look at the impact on the economic base of a small town, i.e., fishing and recreation if the lakes are lowered; clearly state impacts.
SCP2-010-02	10c	Look at the impacts to the region if fish have priority on the water during drought conditions.
SCP2-019-06	10d	The size of the proposed building and fenced compound for Alternative 1 will greatly impact my business along Highway 215.
SCP2-034-02	10e	Look at the effect on the state park, resorts, and people and businesses that use the lake as a vacation get away.
SCP2-011-02	10f	Impacts to residents and visitors to the two lakes should take precedence over restoration of fish.
SCP2-011-06	10g	Property values would be negatively impacted.
SCP2-037-01	10l	Construction would provide benefits to the local economy; having water year round in the creek would be positive.
SCP2-037-04	10m	If fish become listed, the effect to the local economy would be enormous and should be included. Are there any guarantees that the ESA won't close off agriculture in drought years? Alternative 4 could have substantive impact to the economy, inability to refill lake in drought years. Construction would provide benefits to the local economy; having water year round in the creek would be positive.
SCP2-050-03	10n	Require written assurance from NOAA Fisheries and Washington Department of Fish and Wildlife that any fish established in Salmon Creek will not be listed or protected under the federal or state ESA.
SCP2-050-04	10o	Concerned with flows required for anadromous fish and regulations under the Washington State Shorelines Act that will affect residents and landowners. This could create or expand setbacks for landowners and these hardships could create further challenges to our already distressed economy.
SCP2-063-03	10p	Noise factor from pumps in the middle of a mixed business-residential zone will cause a depreciation of land values on both sides of the river.
SCP2-065-03	10q	What will happen to all the homes and businesses such as the Valley Care Nursing home along Salmon Creek.
SCP2-058-019	10r	Your average cost of orchard production is astonishingly high.
SCP2-052-028	10s	The Department would not support subordination of the remaining irrigation rights to the instream rights since it could impact OID's repayment ability and potentially jeopardize repayment of their remaining indebtedness to the United States.

## 11. Public Service and Utilities

### Summary

The cost of the proposal and who will pay or who should pay was brought up in many comments. Commentors would like more specific information about future funding. Some commentors do not believe ratepayers or irrigators should pay for the project. Some wondered if the irrigation rate was assumed for the project and if this is the correct rate that would be used for the pumping. Many thought the power costs used for the analysis were incorrect and out of date and should be recalculated.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-017-08	11a	Has the irrigation rate for power been supported and secured by the PUD commission?
SCP2-017-09	11b	If the PUD sells this much power at a reduced cost won't it increase the other ratepayers' rates? Include possible power rate increases to PUD customers.
SCP2-024-09	11c	The irrigation rate should not apply to the project.
SCP2-032-02	11d	Have a concern about the financial assumptions in the proposal. Okanogan PUD relies on BPA for much (70-80 percent) of its power supply. Costs associated with this project are passed on to the District as part of our energy bill, and are in turn paid by our customers.
SCP2-032-03	11e	The rate used to calculate the annual electricity cost for the pumping station is unreasonably low. A more realistic estimate, using the District's current general service power rate of \$0.048/kWh, would triple the costs. This also applies to the irrigation rate used.
SCP2-032-04	11f	The proponents of this project should not assume the District has an adequate power supply to serve this new large load or that it could be acquired at the discussed power supply rate. It would be a major mistake to make a decision of such magnitude utilizing the economic assumptions in this DEIS; the DEIS is not correct in assuming power rates will be given at the irrigation rate.
SCP2-032-05	11g	There would be significant infrastructure costs associated with system improvements to serve this project (e.g., transformers, larger conductors, line extensions, or substation improvements). Some of these improvements may require SEPA, NEPA, JARPA and cultural studies. The costs of these should be the responsibility of the project and part of the Salmon Creek DEIS as a connected action, not a future obligation of the PUD customers.
SCP2-032-06	11h	The DEIS is not clear who would fund the initial project or the annual O&M cost; identify this third party.
SCP2-032-07	11i	If the public sector identified to pay initial project and operating costs, the cost of recovery may exceed \$2,000 per returning salmon. If BPA is going to fund this, then that is our customers and the cost/benefits cannot justify this project. There are other projects that will provide better value to the fisheries and the public.

SCP2-040-034	11j	This project only benefits 4-5 people—The electric ratepayers are taking the brunt of this cost.
SCP2-065-01	11k	Concerned that the Colville Confederated Tribe will not have to pay the huge power bills that will result.
SCP2-058-013	11l	Ratepayers should not have to pay just because so much money has already been spent.

## 12. Cultural Resources

### **Summary**

A commentator suggested another source be used for information. One commentator suggested that an existing business might have some historical significance. Also, commentators made specific suggestions about the study and tribes that should be involved.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-022-01	12a	Remove language that implies that the Colville Tribe is tardy with information about TCP's.
SCP2-022-02	12b	More than a "discussion" is needed to do a TCP study.
SCP2-022-03	12c	More focus should be on the Southern Okanogan Tribe, rather than tribes that did not live in the project area.
SCP2-022-04	12d	Include the primary published source for ethnographic information in the project area, the Sinkiatk or Southern Okanogan edited by Leslie Spier; the DEIS is not specific to the project area.
SCP2-063-02	12e	The D&D Body Shop may have some historical significance.

## 13. Health and Safety

### **Summary**

There was concern about noise impacts, mosquito breeding in low water years, flooding, and the existing dump in the streambed.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-019-01	13a	Please include information on noise impacts.

SCP2-048-02	13b	The new pumping station will be in an area that has numerous homes. Soundproofing and minimizing glare at night need to be incorporated into its design.
SCP2-014-03	13c	During low water seasons the river through the city of Okanogan will be a less flowing leaving more pools of non-flowing water for mosquito breeding causing human health concerns.
SCP2-042-02	13d	The old Okanogan city dump was in the creek bed for many years. It will be expensive to clean it out. Mitigation could be costly and risky.
SCP2-052-034	13e	The FEIS should acknowledge the increase in potential for flooding on Salmon Creek below the reservoir.

## 14. Relationship between Short-term Uses of the Environment and the Maintenance and Enhancement of Long-term Productivity

No comments received.

## 15. Irreversible or Irretrievable Commitment of Resources

No comments received.

## 16. Cumulative Impacts

### *Summary*

A commentor suggested that the Draft EIS is fatally flawed if the cumulative effects of a massive water withdrawal is not studied, analyzed and mitigation measures with costs and responsibility for mitigation identified. Global warming and weather changes should be included also.

### *Sample Statements*

Comment Log Number	Issue Code	Comment
SCP2-058-017	16a	The DEIS is fatally flawed if the cumulative effects of a massive water withdrawal is not studied, analyzed and mitigation measure identified with costs and responsibility for mitigation identified.
SCP2-058-020	16b	Must include global warming and expected weather changes and address.

## 17. Permits

### Summary

A commentor suggested that the floodplain should be surveyed and recorded. Permits might be necessary if any dams raise the level of impoundments.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-057-03	17a	Floodplain should be surveyed and recorded and corrected if plans go into effect.
SCP2-040-024	17b	Can you get permits to dredge in the creek?
SCP2-067-07	17c	Construction of any dam or dike that could impound water to a depth of 10 feet or more or will impound 10 acre-feet or more may not be started without a permit from the Department of Ecology. Also applies to increasing the depth or capacity of existing reservoirs.

## 18. Process

### Summary

Commentors had many suggestions about the process, from asking for more time to review the Draft EIS, to negotiating a Habitat Conservation Plan before proceeding. Others believe that the Draft EIS is deficient in scope and fact. Some suggested more discussion with local residents and others potentially affected.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-004	18a	I need more information about: upper lake bypass; amount of water that flows through town; how many fish could or would be sustained under the three plans.
SCP2-010-03	18b	Fish have greater value than the welfare of our citizens and there should be a value on the welfare of our citizens.
SCP2-012-01	18c	Please extend the comment period and make it public.
SCP2-019-04	18d	Please include information on the SEPA checklist.
SCP2-033-02	18e	We want agencies to work toward better decisions.
SCP2-024-07	18g	In evaluating cost of Salmon Creek, consider the unquantifiable benefits of value of lifestyle, environment and fish.
SCP2-030-03	18i	Who is in charge of the project?
SCP2-020-05	18j	OID should not proceed without negotiated assurances such as a Habitat Conservation Plan from the federal government.

SCP2-020-08	18k	The project proponents need to have open discussions with the residents of Conconully and try to resolve impacts to the economy and the community.
SCP2-027-01	18m	Project is more control on the farmer, with no benefit to us.
SCP2-036-04	18n	The Salmon Creek Project is not part of the Regional Salmon Recovery Plan and should not be funded; should be included and prioritized based on feasibility with other projects.
SCP2-051-01	18o	The results to date have been unproductive and totally negative.
SCP2-055-05	18p	People who will be paying for this should get a say in it. Please discuss with ratepayers who don't have an interest in it.
SCP2-056-012	18r	Continued listing of species under the ESA has more to do with maintaining agency funding sources than the true long term survival of salmon.
SCP2-058-01	18s	The DEIS is fatally deficient in scope and fact.

## 19. Miscellaneous

### **Summary**

Commentors had many suggestions about fixing certain figures or explaining some tables in the document. There were many suggested text changes.

### **Sample Statements**

Comment Log Number	Issue Code	Comment
SCP2-040-03	19a	Fix Figures 2-6, 2-7, 2-3.
SCP2-040-040	19b	Concerned about CCT control of water in Salmon Creek. What will they take next? Concerned about their assertion that they will force release of up to half of all water for the benefit of the fish.
SCP2-059-02	19c	Explain what Table 3-2 is supposed to show.
SCP2-059-04	19d	Define exceedence levels and fix definition in glossary.
SCP2-059-05	19e	Appendix B-3 gives streamflow of Salmon Creek into Conconully Reservoir. Does this table show one or both North and West Forks of Salmon Creek flowing into the reservoir?
SCP2-059-06	19f	Table 3-21 shows high flows through August. Why the need for high flows through August?
SCP2-052-02	19g	Miscellaneous text changes suggesting correcting inaccuracies or adding clarifying text.
SCP2-056-022	19h	Some want to return to conditions before European settlement. This is extreme.

## 20. Mitigation

### Summary

Commentors had many suggestions for mitigation that should be included and committed to in the Final EIS including landscaping, protection for wells and monitoring of the aquifer, mitigation for businesses affected, and monitoring for sediment.

### Sample Statements

Comment Log Number	Issue Code	Comment
SCP2-014-05	20a	All alternatives must protect and restore all private property back to the property lines.
SCP2-014-06	20b	Landscaping must meet all property owners' specifications.
SCP2-015-01	20c	Mitigation should be required, not just recommended; be more specific.
SCP2-015-08	20d	Why is the flood hazard mitigation measure (flood storage rule) optional?
SCP2-015-09	20e	Commit to providing compensation to those who are adversely affected by the increased pumping from the Okanogan River (existing wells).
SCP2-015-010	20f	Monitor groundwater before and after construction to determine how the adjacent wells are affected by the withdrawals from the Okanogan River; include information about mitigation if drawdown should occur, including who would pay for mitigation.
SCP2-015-011	20g	Commit to mitigation measures for Salmon Creek Valley Aquifer.
SCP2-015-015	20h	Regarding construction activities in the streambed, what are standard mitigation measures, and please present a stream restoration mitigation standard. Please consult a specialist in river restoration.
SCP2-017-04	20i	How will losses to Conconully businesses from low water and the resulting loss of tax revenue for the City of Okanogan and Okanogan County be mitigated; include a mitigation plan for loss of business.
SCP2-024-04	20j	What is the mitigation for recreation business on Conconully Reservoir during February to June in the lowest water year?
SCP2-038-03	20k	Suggest using a groundwater model to determine the likelihood of drawdown for mitigation.
SCP2-040-09	20l	How can early release of flows (before typical irrigation season prior to April 15) be mitigated in regards to Conconully reservoir levels?
SCP2-056-04	20m	There are unanswered questions about mitigation costs: who will pay.
SCP2-067-04	20n	Monitor sediment at the confluence of Salmon Creek and the Okanogan River and use the data to decide whether to conduct streambank rehabilitation in portions of Salmon Creek.
SCP2-067-08	20o	Include a monitoring plan in the FEIS or ROD that includes monitoring parameters such as dissolved oxygen, TSS and temperature and determines whether a thermocline exists in Conconully Reservoir.

SCP2-052-035	20p	Explore applying wildlife mitigation measures on a case-by-case basis since most construction would occur in areas where background disturbance levels are already quite high.
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