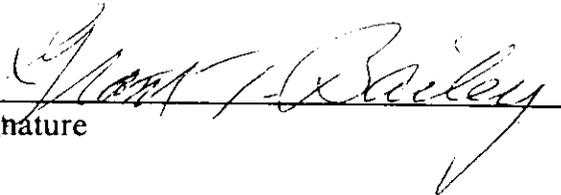


APPENDIX B

Contractor Disclosure Statement

ORGANIZATIONAL CONFLICT OF INTEREST REPRESENTATION STATEMENT

This representation is for Task Order 95AT61545, Contract No. 94AM10240, Wildlife Mitigation Program EIS. As a representative of Jones & Stokes Associates, Inc., I hereby certify that, to the best of my knowledge and belief, no facts exist relevant to any past, present, or currently planned interest or activity (financial, contractual, personal, organizational, or otherwise) which relate to the proposed work; and bear on whether I have (or the organization has) a possible conflict of interest with respect to (1) being able to render impartial, technically sound, and objective assistance or advice, or (2) being given an unfair competitive advantage.



Signature

Name: Mr. Grant T. Bailey

Title: Principal

Firm: Jones & Stokes Associates, Inc.

Date of Execution: 1/23/96

CONCUR:



Signature

Name: M. I. Goldman

APPENDIX C

Comment Letters Received

Letters received commenting on the Wildlife Mitigation Program Draft EIS:

<u>Log Number</u>	<u>Name</u>	<u>Affiliation</u>
WMP-02-001	J. W. Feigel	
WMP-02-002	James A. McGee	PUD No. 1 of Douglas Co.
WMP-02-003	<i>Logging error</i>	
WMP-02-004	J. D. Anderson	Stevens County Commissioner, District 2
WMP-02-005	Susan P. Barnes	Beak Consultants, Inc.
WMP-02-006	Gordon Stewart	Flathead Wildlife, Inc.
WMP-02-007	Howard A. Kemper	
WMP-02-008	Preston Sleeper	U.S. Department of the Interior
WMP-02-009	Jane Cummins	League of Oregon Cities
WMP-02-010	Laura Schroeder	Schroeder Law Offices
WMP-02-011	Rebecca J. Inman	State of Washington Department of Ecology
WMP-02-012	Rick Bass	
WMP-02-013	Alexis DeCaprio	Northwest Environmental Defense Center
WMP-02-014	Bern Shanks	State of Washington Dept. of Fish and Wildlife
WMP-02-015	Arlene Montgomery	Friends of the Wild Swan
WMP-02-016	Chris Merker	Columbia Basin Fish and Wildlife Authority
WMP-02-017	John Stanton	The Ecology Center
WMP-02-018	Cal Groen	Idaho Department of Fish and Game
WMP-02-019	Richard B. Parkin	U.S. Environmental Protection Agency
WMP-02-020	Preston Sleeper	U.S. Department of the Interior
WMP-02-021	Dr. Robert G. Whitlam	State of Washington Office of Archaeology and Historic Preservation

'WILDLIFE MITIGATION PROJ, 18 AUG 96
DDE-EIS-0246

WRITTEN COMMENT: IT MUST BE
OVER EMPHASIZED THE "FOOD CHAIN"
ALL ANIMALS, FISHES, PLANTS, TREES,
INSECTS; ETC THEIR IMPORTANCE &
THE CURRENT DISTRIBUTION GOING ON
NOW. HOW TO MAINTAIN THE CURRENT
FOOD CHAIN? SEE 
WILSON FEIGEL PROJ 17 DTSI
1329 NE ISSALS DEMO.
VANCOUVER WA 98884 8718

RECEIVED BY BPA PUBLIC INVOLVEMENT 01 LOG#: WMP-OR JET
RECEIPT DATE: AUG 19 1996

Commissioners:
MICHAEL DONEEN
T. JAMES DAVIS
LYNN M. HEMINGER

Chief Executive Officer/Manager:
ELDON E. LANDIN



Public Utility District No.1 of Douglas County

1151 Valley Mall Parkway • East Wenatchee, Washington 98802-4497 • 509/884-7191

August 13, 1996

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

AUG 20 1996

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP 02 002
RECEIPT DATE: AUG 21 1996

Re: Comments on Wildlife Mitigation Program, Draft EIS

Dear Sir or Madame:

The District appreciates the opportunity to review BPA's Wildlife Mitigation Program, Draft EIS.

Chapter 4.2.4 Potential Program - Wide Mitigation Measures - Fish and Wildlife Resource Page 4/64

The potential program mitigation measures include the recommendation to establish 15 meter buffers for the use of herbicide to control vegetation near perennial streams. This recommendation ignores the need to control noxious weeds in the wetland/riparian zone. Purple loosestrife is a noxious weeds that out competes native vegetation. Both EPA and Washington Department of Ecology have authorized the use of Rodeo™ in wetlands and riparian areas to control purple loosestrife. Herbicide treatment of purple loosestrife is the least environmentally damaging and cheapest method to control this weed.

Chapter 4.3.4 Potential Program - Wide Mitigation Measures - Vegetation Resource Page 4/78

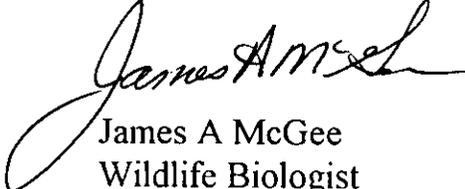
Fire is discussed as a management tool for the development of desirable habitat for wildlife. No where is there a discussion of the need to provide fire protection to preserve habitat that is created by BPA's wildlife mitigation program. One careless individual can destroy years of habitat development by tossing a lit cigarette butt or parking a vehicle in tall grass. The District's

experience has been that rural fire district personnel are less than enthusiastic about controlling wildfires on land that don't provide direct funding or property taxes money to the district. Managers of the habitat projects should have the ability to contract with a rural fire districts, if necessary, to insure the protection of Northwest rate payers investment in this Wildlife Mitigation Program.

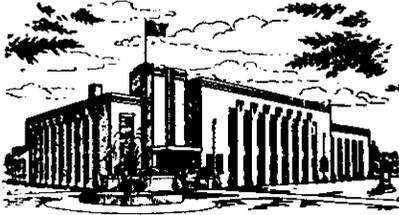
Chapter 4.6.3 Potential Program - Wide Mitigation Measures - Cultural and
Historic Resources Page 4/90

Deep rooted vegetation can damage archeological site. Where appropriate deep rooted vegetation should not be developed on any archeological site identified by a SHPO or a tribe.

Very Truly Yours,



James A McGee
Wildlife Biologist



J.D. (Andy) Anderson

Stevens County Commissioner, District 2

Stevens County Courthouse • P.O. Box 191 • Colville, WA 99114 • (509) 684-3751

Home Address: P.O. Box 276 • Kettle Falls, WA 99141 • (509) 738-2887

September 4, 1996

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

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: WMP-02-004

RECEIPT DATE:

SEP 13 1996

Greetings:

Your DOE/EA-0246, Wildlife Mitigation Program, Draft Environmental Statement, August, 1996 has been recently received, and reviewed.

It is difficult to restrain righteous anger, and to avoid frustration, at the continued absurdity of this "mitigation" proposal, and then this EIS procedure.

The following comments are submitted to address the items listed in summary pages 2, 3, and 4. [1-8]

1. There has not been satisfactory historical data and facts that prove that wildlife was destroyed by dams. Neither has there been satisfactory data showing the actual natural compensation movement of wildlife in the face of change, whether by natural forces, or other.
2. To move ahead now with a foregone conclusion that "mitigation must take place" is a serious error, and a very costly one.
3. Even though notices were given about meetings/hearings; the general public, who pay the bills, are still unaware, and ignorant, of all of this.
4. The citizens, consumers, and tax-payers have been hit with so many surprises, that strongly uncompromising backlash is occurring. They will not take it anymore.
5. The "proposed action to establish a comprehensive program that addresses the common issues..." is the same continued jargon and double-talk presented every so often in the these procedures.



WE THE PEOPLE ARE THE RIGHTFUL MASTERS OF BOTH CONGRESS AND THE COURTS - NOT TO OVERTHROW THE CONSTITUTION, BUT TO OVERTHROW THE MEN WHO PERVERT THE CONSTITUTION.
"TO SIN BY SILENCE WHEN THEY SHOULD PROTEST MAKES COWARDS OF MEN." - ABRAHAM LINCOLN

"THEY THAT CAN GIVE UP ESSENTIAL LIBERTY TO OBTAIN A LITTLE TEMPORARY SAFETY DESERVE NEITHER LIBERTY NOR SAFETY." - BENJAMIN FRANKLIN



6. As part of above, to then follow that statement up in your draft (summary - p.1) with "...project proponents take the lead in Preparing Project Management Plans..." is like a slap in the face of those who see no justification for any mitigation whatsoever.
7. The proposal and whole procedure is strongly rejected!
8. No action needed!

The Federal Government has no Constitutional authority to spend the taxpayers money on this socialist program. Additionally, our Legislators are violating their oath of office by authorizing funding. In the future, we hope to elect strong representatives who will gut these types of programs.

In closing, I must reiterate the words of a professor-friend of mine upon review of the Wildlife Mitigation Program: "To try to analyze B.S. is pointless".

Respectfully submitted,



J.D. Anderson, Commissioner

JDA:lme

cc: Senator Bob Morton
Representative Steve Fuhrman
Representative Cathy McMorris
Senator Slade Gorton
Senator Patty Murray
Representative George Nethercutt
John Wahl, Chelan County Commissioner
Ted Anderson, Skagit County Commissioner
Ted Hopkins, Lincoln County Commissioner
Jim Hall, Ferry County Commissioner
Mike Hanson, Pend Orielle County Commissioner

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>WMP-02-005</i>
RECEIPT DATE: SEP 13 1996

3819 North Lombard St.
Portland, Oregon 97217
August 30, 1996

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

Re: Comments on BPA's Wildlife Mitigation Program Draft EIS (DOE/EA-0246)

To whom it may concern:

Attached are my comments on the Wildlife Mitigation Program Draft EIS (DOE/EA-0246). Under contract by the Northwest Power Planning Council, I reviewed the Wildlife Mitigation Program Draft EIS to determine how it relates to the Council's Draft Wildlife Plan and to make the appropriate recommendations for revising the Wildlife Plan. If you have any questions you may contact me at (503)735-0537.

Sincerely,

Susan P. Barnes

Susan P. Barnes
Environmental Specialist/Consultant

cc: Peter Paquet, Northwest Power Planning Council

BPA Wildlife Mitigation Program Draft EIS

Comments by:

Susan P. Barnes, Environmental Specialist/Consultant

Chapter 1

Page 3, after first bulleted paragraph: Add a bulleted paragraph describing the Wildlife Plan.

Chapter 2

Page 15, “6. Develop and Implement an Action Plan for Achieving the Goals (Alternative 5)”, first sentence: Add “methods” after the word “best”.

Page 17, “1. Define the Area of Concern (Alternative 4)”, last bulleted paragraph: Change “expeditions” to “expeditious”.

Page 18, “4. Characterize Site Conditions and trends (Alternative 4)”: Add statement that Project Managers would gather baseline information.

Page 19, “6. Develop and Implement ...”, third bulleted paragraph: List several examples of passive recreation after the words “passive recreation”.

Page 20, Section 2.1.6, first paragraph, second to last sentence: Add “or avoided” after the word “minimized”.

Page 22, “5. Establish Project Goals (Alternative 5)”, second bulleted paragraph: Add a comma after the “e.g.”

Page 23, “6. Develop and Implement ...”, first paragraph, second to last sentence: Add “or avoided” after the word “minimized”.

Page 25, Section 2.1.7, third paragraph, second to last sentence: Delete extra period at end of sentence.

Page 27, “5. Establish Project Goals (Alternative 6)”, second bullet, fourth asterisk: Delete the “and” at the end of the sentence and place at the end of the sentence of the fifth asterisk on Page 28.

Page 32, Table 2-1: Add a table key at the bottom of the table.

Page 35, Table 2-2, “Existing Conditions” column, “Wildlife” row: Add “are” after the word “Basin”

Chapter 3

Page 38, Section 3.3, second paragraph, second sentence: Add “land management activities” after the word “obstruction”.

Page 41, Section 3.6, sixth paragraph, second sentence: Change “survives” to “survived” and add “have” after the word “stands”.

Pages 41–42, Section 3.7: Why are there are no words in this section specific to shorelines?

Page 43, Section 3.9, second paragraph: Add examples of small rural communities as are given for all other population centers in order to be consistent.

Page 43, Section 3.10, first paragraph: Delete second sentence - photography and birdwatching are not necessarily associated with camping and hiking. Add photography and birdwatching to the list of recreational opportunities in the first sentence.

Page 44, Section 3.1.1: This section seems vague. There is no qualifying statements about the air quality in the Basin (e.g., the average number of limited air quality days in major population centers within the Basin. Is there any more specific information that can be added?

Chapter 4

Page 45: The concept of Potential Program-Wide Mitigation Measures is introduced here. It seems kind of funny that there are mitigation measures for mitigation measures. Can another term be used to describe these techniques?

Page 47, Alternative 4: The second sentence seems to include a contradiction. Seems like the increased likelihood of localized soil erosion or compaction (from ongoing commercial use) could result in significant long-term adverse impacts. Ongoing commercial uses could very well adversely impact soils. The word "ongoing" implies long-term.

Page 48, Section 4.1.3, Land Acquisition Techniques: Change "little" to "few". It should read either "little direct effect" or "few direct effects".

Page 48, Section 4.1.3, Plant Propagation Techniques, first paragraph: Add "the implementation of" after "reduced by".

Page 48, Section 4.1.3, Plant Propagation Techniques, first paragraph: Change "and seedbed preparation" to "as well as seedbed preparation".

Page 48, Section 4.1.3, Habitat Creation and Conversion, third paragraph: What are nest types with foundation? Is this supposed to be "... nest types with foundations" ?

Page 49, Water Distribution Techniques: Add "Culverts can be installed to divert water to vegetated areas in order to decrease sedimentation and reduce water flows".

Page 49, Fire Management Techniques, first sentence: The statement that "Natural fire management would increase the risk of high intensity wildfires" is true for the short-term but not necessarily for the long-term. Maybe add: "However the risk of high intensity wildlife fires would likely decrease in the long-term".

Page 49, Fire Management Techniques, last sentence of first paragraph: Change "reclamation" to "site restoration and regeneration".

Page 49, Vegetation Management: Enhancement and Control, first sentence: This statement is vague. Need more information on the general decomposition rates of herbicides to better understand the short-term, long-term, and cumulative impacts of herbicides.

Page 49-50, Vegetation management: Enhancement and Control: There is no mention of timber harvest (i.e., selective cutting, thinning, pruning) under this section. Seems like this is an important and frequently used technique for managing and controlling vegetation.

Page 51, Transportation/Access Techniques, first paragraph, second sentence: This sentence is true initially, but with revegetation over time the impacts of constructing fences and gates will be diminished. Distinguish between short-term and long-term impacts.

Page 52, fourteenth bullet: This says that culverts are a type of erosion control feature while on Page 49 under Water Distribution Techniques culverts are described as posing a risk to soil erosion. Need to include the benefits of culverts under this section on Page 49 to make consistent with the recommendation to install culverts on Page 52.

Page 52, 15th bullet: Project Managers will need a protocol (i.e., standards) for decommissioning roads.

Page 53, second bullet: Project Managers will need a protocol (i.e., standards on grade, slope, road surface, culvert placement, ditches, etc.) for road construction.

Page 56, Alternative 3: Biological Objectives, last sentence: Change to read: "Fertilizers and herbicides may be used .." The word "would" implies that fertilizers and herbicides will definitely be used to meet mitigation goals.

Page 58, Land Acquisition Techniques: This paragraph is weak. The potential implications of land acquisition on fish and water quality are greater than are being described here. For example, a change in land use could have a significant effect on fish and water quality. Also, should lands be taken out of crops or stock production, erosion that might have resulted from farming and grazing would likely be reduced (not just might be).

Page 58, Plant Propagation Techniques, third paragraph, first sentence: Change "leeches" to "leached".

Page 58, Habitat Creation and Conversion, first sentence: In addition to beneficial and adverse effects, wetland creation also may have no effect on fish.

Page 59 Water Development and Management Techniques, second paragraph, last sentence: Why would no significant change in water use or management practice occur in many cases on lands where water rights area acquired. I would think that if water rights are acquired there would a some significant change planned for in water use. Thus, the impacts of obtaining water rights would often affect fish and water quality. Why obtain water rights if in most cases there would be no significant change in water uses?

page 59, Water Distribution Techniques, first paragraph: If designed correctly, culverts and drainage ditches can protect water quality (culverts and ditches are referred to as erosion controls elsewhere in the EIS [e.g. Page 52]). This paragraph focuses on the adverse impacts and neglects the potential benefits of certain culverts design and placements. Culverts are not inherently bad.

Page 59, Water Distribution Techniques, second paragraph: Add to the end of the sentence: "... and block fish passage."

Page 60, top paragraph, first sentence: Delete the "as well" at the end of the sentence because it's redundant.

Page 60, Vegetation Management: Enhancement and Control, second paragraph, first sentence: Change to read: "However, the methods used ..."

Page 60, Vegetation Management: Enhancement and Control, second paragraph, second to last sentence: Change to read: "An analysis of each type of herbicide is beyond .."

Page 61, Multiple Use Techniques: Add a space after the first sentence to separate the paragraphs.

Page 61, Multiple Use Techniques, second sentence: Change to read: "Reduction of grazing as a mitigation action would likely improve fish habitat and water quality ..." The word "could" is weak and likely is an understatement more often than true.

Page 62, Transportation/Access Techniques, first paragraph, last sentence: Add words to read: "Should access be increased or roads developed, then stream sedimentation near roads and alteration of stream courses might increase therefore directly affecting fish habitat and fish survival, production, and passage."

Page 63, last bullet: Need to italicize "For projects involving use of herbicides" to make consistent with other bulleted paragraphs.

Page 66, Alternative 3: Biological Objectives, second paragraph: In the second to last paragraph, change "prescribed burn" to "prescribed burning". Change the last sentence to read: "These techniques would involve the clearing of land and the use of heavy equipment."

Page 67, Alternative 6: Balanced Approach: The paragraph states that no significant impacts are expected from this alternative. That's hard to believe. Aren't significant beneficial impacts at least expected? It is implied in this paragraph that impacts are only negative - not true!

Page 67-68, Plant Propagation Techniques: There is no mention of the use and impacts of fertilizers in this section. Needs to be addressed because they can affect wildlife populations.

Page 69, Water Distribution Techniques, first paragraph: I think that the direct loss of habitat from the development of pipelines, culverts, ditches, etc. would not significantly impact wildlife. After the last sentence add: "However, these structures are often placed in already disturbed areas so the loss of habitat would likely be minimal."

Page 69, Vegetation Management: Enhancement and Control, first paragraph: Change "... population decline.." to "... population declines...".

Page 69, Vegetation Management: Enhancement and Control, third paragraph: Fertilizers should be addressed here.

Page 69, Vegetation Management: Enhancement and Control, fifth paragraph: These impacts are also applicable to fish, but are not addressed in the fish section. Add this impact discussion also to the Vegetation Management section for fish.

Page 70, Species Management Techniques: Predator control is not mentioned here while is listed in Table 2-1 as being an implemented technique.

Page 70-71, Multiple Use Techniques: There is no mention of timber harvest in this section. Address specifically since it can significantly impact wildlife.

Page 76, Water Development and Management Techniques, second paragraph: This paragraph focuses on the adverse effects of water development projects on vegetation. What about the fact that new sources of water may allow vegetation to establish in new areas? Thus, water development may also benefit vegetation. I think this is worth mentioning.

Page 83, Habitat Creation and Conversion: There is no mention of lands converted to or from forestland. This would change land use.

Page 84, Vegetation Management: Enhancement and Control, last sentence: Change sentence to read: "Water level manipulation may unintentionally affect adjacent landowners by increasing or decreasing the water table ..."

Page 84, Species Management Techniques, second paragraph, second sentence: There is an error in the placement of the parentheses.

Page 84, Multiple Use Techniques, first paragraph, first sentence: Change to read: "Allowing crop production and ..."

Page 97, Section 4.7.4, ninth bullet: This bullet is a repeat of the fifth bullet. Delete one of them.

Page 106, Alternative 5, first sentence: This sentence says that Alternative 5 would include a relatively low level of use for fire, fertilizers, and herbicides. In Table 2-1, fertilizers and herbicides are given an "infrequent use" rating. However, Table 2-1 indicates a moderate use of fire under Alternative 5. Inconsistency here.

Page 106, Plant Propagation Techniques: The word "locally" is too vague. I'm left wondering how far effects may be seen/measured. I know it would be dependent on weather, topography, amount applied, etc., but perhaps some of that information can be included here.

Page 107, Multiple Use Techniques, second paragraph: This says that automotive emissions would disperse quickly. Can this also be said about dust and vehicle emissions mentioned under Habitat Creation and Conversion, Water Development and management Techniques, and Water Distribution Techniques sections? This seems inconsistent to me.

Page 110 fourth paragraph from top (under Cumulative impacts section): Why only one sentence to describe the benefits of mitigation activities on wildlife?? Seems like there should be a lot more to say considering that the purpose of the wildlife mitigation program is to benefit wildlife.

Page 112, Section 4.13.2 Fish and Water Resources/Quality: How can it be said that "no significant impacts area expected" to fish and water quality? Aren't beneficial impacts expected? This conclusion is not consistent with the previous sections.

Chapter 5

Page 118, Section 5.10.2: Typos: "Wild and Scenic Rivers" and a period is missing from the end of the sentence.

Page 121; Chapter 6: References: Add the Draft Wildlife Plan to the list of references.

Appendix A

Appendix A. Page 13, 5.3.3 General Drawbacks: Add: "can increase sediment delivery into rivers and streams"

Appendix A. page 14, 7 Vegetation Management: Enhancement and Control, second paragraph: Change "prescribed burn" to "prescribed burning".

Appendix A. Page 20, 9.1.1, first paragraph, second sentence: Change to read: "... and planting uncultivated areas can improve habitat for certain species."

Appendix A, Page 22, 9.4.3: No mention of adverse impacts to soil, water quality, or riparian vegetation. Add the following bullet: “adverse impacts to soil, water quality, fish habitat, and riparian vegetation from trampling of vegetation, soil compaction increase sediment loading into streams”

Appendix A, Page 23, 10.1.3: No mention of how fences and gates can be unpleasant to the human eye. Add the following bullet: “aesthetically unpleasant”

Appendix A, Page 24, 10.2.3: No mention of the effects of roads on natural resources. Add the following bullet: “ impacts to natural resources (i.e., water quality, wildlife populations).

Note: Throughout document sometime reference to feet is presented as “ft” and other times “ft.” Need to make consistent throughout the EIS.

SEP 23 1996

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: NMP-02-006

RECEIPT DATE:

SEP 24 1996

Flathead Wildlife, Inc.
P. O. Box 4
Kalispell, MT 59903

September 12, 1996

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

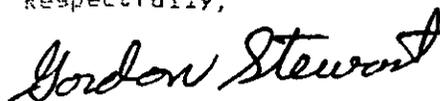
Dear Madam or Sir:

Flathead Wildlife, Inc. (FWI) has reviewed the Draft Environmental Impact Statement for the Bonneville Power Administration (BPA) Wildlife Mitigation Program and is submitting the following comments for your consideration in the proposal to develop standards and guidelines for the program.

FWI has been a persistent supporter of mitigation for wildlife habitats impacted by hydropower development on the Columbia River system, with particular interest in the Hungry Horse and Libby Dam projects. We applaud your efforts to move forward in the area of wildlife mitigation through development of program standards and guidelines. We would concur with your proposal to standardize the planning and implementation of new individual wildlife mitigation projects funded by BPA. Further, we support the concept of using Alternative 2 (addressing only existing legal requirements) as a base for other action alternatives. In the review and evaluation of the action alternatives 3 through 6, FWI would recommend that BPA select Alternative 6, which would balance wildlife mitigation objectives, costs and administrative efficiency, and general environmental protection. We know that many wildlife mitigation programs were developed with specific wildlife species forming the basis for program objectives and procedures. This is not to be thought of as archaic for in most cases certain wildlife species having a more prominent status for one or more reasons became the focus of mitigation planning efforts because the impacts to these species were more easily quantified. We believe that the intervening years have brought much more attention to ecosystem concepts and a balance within the communities of wildlife in habitats and landscapes affected by hydropower development. We believe Alternative 6 provides direction and the opportunity to implement concepts of ecosystem management into projects funded by the BPA Mitigation Program.

In summary, FWI recommends you select the preferred alternative (6) in your proposal to standardize the planning and implementation of new individual wildlife mitigation projects funded by BPA.

Respectfully,



Gordon Stewart, President

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP 02-007
RECEIPT DATE: SEP 24 1996

SEP 23 1996

405 NW 74th Street
Vancouver, WA 98665
September 20, 1996

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

Dear Sirs:

I appreciate very much your sending me the WILDLIFE
MITIGATION PROGRAM, Draft Environmental Impact Statement
to read and comment on.

I am especially interested in the Vancouver Lowlands Wildlife
Project.

I would like to see as much private land as possible acquired
or leased for wildlife habitat and public use, such as
hunting and wildlife watching.

I support Alternative 6: Balanced Action.

I value your concern and work on the BPA Wildlife Mitigation
Program.

Thank You;

Howard A. Kemper
Howard A. Kemper



IN REPLY REFER TO.

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

SEP 27 1996

September 24, 1996

ER 96/0552

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

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: WMP-02-008

RECEIPT DATE: SEP 30 1996

Bonneville Power Administration,

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement for the Wildlife Mitigation Program, Idaho, Montana, Nevada, Oregon, Washington. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Preston Sleeper
Acting Regional Environmental Officer



*Working together
for livable
Oregon
communities*

League of Oregon Cities
Local Government
Center
1201 Court St. NE
Salem, OR 97301
P.O. Box 928
Salem, OR 97308
(503) 588-6550 or
1-800-452-0338
Fax: (503) 399-4863

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DIRECTOR

Richard C. Townsend

Printed on Recycled Paper



RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-009
RECEIPT DATE: OCT 01 1996

OCT - 1 1996

September 26, 1996

TO: Public Involvement Manager, Bonneville Power Administration

FROM: Jane Cummins, Senior Staff Associate *JC*

SUBJECT: **Bonneville Power Administration's Wildlife Mitigation Program Draft Environmental Impact Statement**

Earlier this year, Tom McKinney visited with several local government officials about Bonneville's Wildlife Mitigation Program. City and county representatives presented their concerns and recommendations. We appreciated that opportunity to be involved, and now are pleased to respond to the Draft Environmental Impact Statement.

The League supports Bonneville's process to ensure that the agency's individual wildlife mitigation projects are planned and managed with appropriate consistency across projects, jurisdictions, ecosystems, and time. Although we have not taken a formal position to support any of the specific alternatives, we believe the approach outlined in Alternative 6 (Bonneville-preferred) is reasonable. It seeks to balance wildlife mitigation objectives, cost and administrative efficiency, and general environmental protection.

On a specific note, under the description of the process steps, involvement of stakeholders is discussed in the second step. We recommend that in identifying interested parties you include city agencies.

Thank you again for the opportunity to comment.



**SCHROEDER
LAW OFFICES**

3355 N.E. DAVIS
PORTLAND, OR 97232
TELEPHONE (503) 232-7110
FAX (503) 238-4076

P.O. BOX 1392
115 W. HERMISTON AVE.
SUITE 140
HERMISTON, OR 97838
TELEPHONE (541) 564-9290
FAX (541) 564-0158

October 1, 1996

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>WMP-02-010</i>
RECEIPT DATE: <i>OCT 01 1996</i>

Ms. Jean Pennington-CKPS
905 N.E. 11th Ave.
Portland, OR 97232

VIA HAND DELIVERY

Re: BPA's Wildlife Mitigation Program Draft Environmental Impact Statement(EIS)

Dear Ms. Pennington:

Schroeder Law Offices' comments regarding the Wildlife Mitigation Program Draft EIS (August 1996) are enclosed.

Sincerely,

Bridget Bailey

Bridget Bailey
Assistant to Laura Schroeder

COMMENTS submitted by Schroeder Law Offices
BPA Wildlife Mitigation Program Draft EIS (August 1996)

I. Statutory Provisions That Require Balancing of Agricultural Interests

Appendix A includes statutory provisions of the Pacific Northwest Electric Power Planning and Conservation Act¹ which provide that 1) a balancing of agricultural interests (as consumers of electric power) and 2) broad participation of customers and local bodies of the region are required in carrying out wildlife mitigation² and are consequently the basis for the referenced EIS.

II. Comments to Specific Provisions of the Draft Environmental Impact Statement

Supported in part by the statutory directives set out above, we provide comments to the BPA Wildlife Mitigation Program Draft Environmental Impact Statement of August, 1996 as follows:

Chapter 1: Purpose and Need for Action

Re: Specific mitigation actions expected (p. 1)

Comment: Irrigated lands should be excluded from fee title land acquisition and management. A stricter standard for a showing of loss to wildlife needs to be shown before taking any irrigated land out of production, or imposing greater power costs on irrigators. The Mitigation Program Draft EIS itself lists and describes irrigation as a technique for wildlife enhancement.³ Therefore, the relationship between the maintenance of irrigated farmlands and related positive effects on wildlife populations needs to be examined.⁴

Regarding conservation actions, we propose cooperative projects with irrigation districts to expand water conservation infrastructure. Irrigation districts should be provided with a portion of the mitigation budget to carry out water conservation projects under the mitigation plan.⁵ For

¹16 U.S.C. § 839.

² See Balancing power costs and fisheries values under the Northwest Power Act. Michael B. Early and Egil Krogh, 13 Puget Sound L.Rev. 281 (1990).

³See "BPA Wildlife Mitigation Program Draft EIS," Appendix A, p. 4 (August 1996).

⁴See "Wildlife Mitigation Rule and Response to Comments," Northwest Planning Council, November 21, 1989, Dissenting Statement by Council Member John C. Brenden

⁵See §839d(1)(B).

example, cost sharing to update water systems that conserve water could both improve wildlife habitat, and maintain the productivity of irrigated crop lands.

Re: Decisions to be made - Conditions for funding types of wildlife mitigation actions (pp. 6-7)

Comment: Budget allocations for actions proposed by any one impacted party, such as the tribes, should be strictly limited to fixed percentages. In the Washington Wildlife Mitigation⁶ budget, 11.3% of the annual total budget amount was available for projects proposed by CTUIR and approved by BPA. The Agreement provided that coalition members could agree to change percentage allocations. The plan should prohibit changes in fixed allocations because doing so would not be consistent with this NEPA process to allow a balancing of interests.

Comment: Funding for a mitigation project should be prohibited unless actual loss and high probability of improvement are shown with scientific evidence. Implementing a mitigation project upon a finding of a previous loss of wildlife habitat, without evidence of probable benefits to wildlife habitat upon implementation, is not enough to compensate for increased power costs.

Re: Categorical elimination of wildlife mitigation techniques

Comment: Private agricultural land and private land with appurtenant public grazing rights should be excluded from the land acquisition program. The cost of acquiring such lands is not equivalent to the proposed return. Such acquisitions take a larger share of the total budget available for mitigation. The typical market value of land in the Columbia Basin (in 1993 quoted values per acre) was \$2,000-\$2,500 for agricultural cropland, and \$900-\$1,300 for agricultural pasture. All other categories fell in lower price ranges, i.e. from \$50 per acre to \$1,000 per acre.⁷ Without more evidence of a direct benefit to wildlife, such lands should not be acquired for mitigation purposes. In any case, the market value of land should be a greater factor in determining whether a piece of land is acquired.

Re: Public involvement (p.7)

Comment: For a balancing of interests, any advisory committee to review mitigation plans from a basinwide perspective should have an agricultural member. The advisory committee must balance the public and private sector so they are equally represented.⁸

Comment: A regional program must involve local experts to provide adequate expertise

⁶See "Washington Wildlife Mitigation Agreement," BPA (April 1993).

⁷See "Oregon Trust Agreement Planning Project," BPA, p. 24 (October 1993).

⁸See "Wildlife Mitigation Rule and Response to Comments," Northwest Planning Council, November 21, 1989, Dissenting Statement by Council Member John C. Brenden.

on the economic and social costs⁹ of a specific mitigation project. In addition, without consistent local participation, the statutory requirement to balance interests¹⁰ will be violated. A case-by-case approach is necessary to adequately balance differing local economic impacts.

Chapter 2: Alternatives Including the Proposed Action (p. 9)

Re: Process for Project Implementation/Involve Stakeholders

Comment: Private and local stakeholders need to be assured of equal participation in order to balance power interests.¹¹ The Draft EIS does not address how statutorily required balanced representation of interests is going to be achieved in the process. If public involvement is streamlined, adjacent landowners should be involved in cooperative planning and partnerships.

Re: Process for Project Implementation/Adapt Management to New Information

Comment: Benefits to wildlife habitat should be measured on an ongoing basis by a preset criteria. If no benefits are revealed, then spending on a specific mitigation project should be halted. Doing so complies with statutory requirements to cost-effectively enhance wildlife habitat.¹²

Re: Process for Project Implementation/Establish Project Goals

Comment: Under included project goals, development of habitat should also complement the existing activities of private landowners.

Re: Develop and Implement an Action Plan for Achieving the Goals

Comment: Regarding management techniques, funding should be directed to agricultural members of the region, perhaps through the Oregon Department of Agriculture and its extension service, to cover costs to identify and implement the use of pesticides, herbicides, and fertilizers with the lowest environmental cost that still achieve results economically viable to the agricultural industry.

⁹16 U.S.C. §839 b(c)(8).

¹⁰16 U.S.C. §839 b(h)(5).

¹¹See § 839b(h)(5).

¹²See § 839b(e)(1).

Chapter 3: Affected Environment (p.37)

Re: Economics

Comment: The economic data is incorrect, or presented in a misleading manner. The agricultural industry provides more than 9% of the employment in certain local areas of the Columbia River Basin.

Chapter 4: Environmental Consequences (p. 91)

Re: Economics - Land Acquisition Techniques

Comment: To balance agricultural interests, the alternative that is chosen should require the continued commercial use of any mitigation lands where economic benefits are obtained, UNLESS there is predictable and measurable future loss to wildlife habitat which outweighs the economic benefits obtained.

Re: Economics - Water Development and Management Techniques

Comment: Additional use of water on mitigation areas should be prohibited because interference with existing water rights has severe economic impacts on users and the economy of local communities. Additional use of water on mitigation areas conflicts with the statutory directive to implement conservation.

Re: Recreation - Context/Desired Condition

Comment: Project managers should seek a desired future condition that does not promote or encourage recreational activity that conflicts with current agricultural and ranching uses of private and public land.

Chapter 5: Consultation, Review, and Permits (p. 117)

Re: Farmlands

Comment: Because wildlife mitigation under the plan must balance agricultural interests, a rating lower than 160 on the USDA rating system should be used as a threshold to require the project manager to consider alternatives to converting farmland. For example, commercial crops could be utilized to achieve wildlife mitigation objectives.

III. Proposed Techniques that Conflict with Conservation Requirements

“Available Management Techniques” listed in Appendix A of the Draft EIS appear to conflict with the statutory directive to the BPA Administrator to acquire resources through conservation.¹³ Specific techniques that conflict with conservation of water resources include the following:

1. Irrigation (Section 2.3)
2. Wells (Section 4.1)
3. Diversions (Section 4.2)
4. Spring Development (Section 4.3)
5. Water Rights Acquisition (Section 4.6)

¹³See §839(d)(1)(B).

Appendix A

§839. Congressional Declaration of Purpose

Statutory purposes include

- to encourage . . . “conservation and efficiency in the use of electric power”¹
- to “assure the Pacific Northwest of an adequate, efficient, economical, and reliable power supply”²
- to provide for the participation and consultation of . . . local governments, consumers, customers, users of the Columbia River System, . . . and the public at large within the region in the development of regional plans and programs related to energy conservation . . . and protecting, mitigating and enhancing fish and wildlife resources.³
- to “protect, mitigate and enhance the fish and wildlife . . . of the Columbia River and its tributaries . . .”⁴

§ 839b. Regional Planning and Participation

In its operations, the Pacific Northwest Electric Power and Conservation Planning Council “shall, to the greatest extent possible, solicit . . . economic, social, environmental, and other technical studies from customers . . . and other bodies or organizations in the region with particular expertise.”⁵

The Council’s regional conservation and electric power plan shall . . . “give priority to resources which the Council determines to be cost-effective.”⁶

The Council’s plan “shall set forth a general scheme for implementing conservation measures . . . with due consideration by the Council for . . . compatibility with the existing regional power system . . . and other criteria which may be set forth in the plan.”⁷

¹ 16 §839 (1)(A).

² §839 (2).

³ §839 (3) (A).

⁴§839(6).

⁵ §839 b(c)(8).

⁶ §839 b (e)(1).

⁷ §839 b(e)(2).

The Council “shall maintain comprehensive programs to . . . obtain public views concerning major regional power issues” and “secure advice and consultation from the [BPA] Administrator’s customers and others.”⁸

In the preparation, adoption, and implementation of the plan, the Council and [BPA] Administrator shall encourage the cooperation, participation, and assistance of appropriate . . . State political subdivisions . . .⁹

§ 839b(h). The Council’s Fish and Wildlife Program

The Council shall provide for public participation and comment regarding all recommendations by agencies and regional Indian tribes.¹⁰

The Council “shall develop a program on the basis of such recommendations, supporting documents, and views and information obtained through public comment and participation, and consultation with the agencies, tribes, and customers . . .”¹¹

Requirement to balance power interests: The program shall consist of measures to protect, mitigate, and enhance fish and wildlife . . . while assuring the Pacific Northwest an adequate, efficient, economical, and reliable power supply.¹²

Additional program criteria: “The Council shall include in the program measures which it determines . . .

-will be based on, and supported by, the best available scientific knowledge”¹³ and

-“utilize, where equally effective alternative means of achieving the same sound biological objective exist, the alternative with the minimum economic cost . . .”¹⁴

⁸§839b (g)(1)(B)(C).

⁹§839b (g)(3).

¹⁰§839b (h)(4)(B).

¹¹§ 839b(h)(5).

¹²§ 839b(h)(5).

¹³§839 b(h)(6)(B).

¹⁴§ 839 b(h)(6)(C).

“The Council shall determine whether each recommendation received is consistent with the purposes of this chapter.”¹⁵

Mandatory basis for rejecting proposed measures: “If the Council does not adopt . . . a recommendation, it shall explain in writing . . . the basis for its finding that the adoption of such recommendation would be “inconsistent” with paragraph (5) or (6) of this subsection or “less effective than the adopted recommendations . . .”¹⁶

“Consumers of electric power shall bear the cost of measures designed to deal with adverse impacts caused by the development and operation of electric power facilities and programs only.”¹⁷

§839b; §839d. Conservation

The plan shall give priorities to resources which the Council determines cost-effective. First priority is to be given to conservation.¹⁸

The BPA Administrator “shall acquire such resources through conservation . . . as the Administrator determines are consistent with the plan . . .” Such conservation measures may include and are not limited to “technical and financial assistance to, and other cooperation with the Administrator’s customers and governmental authorities to encourage maximum cost-effective voluntary conservation and the attainment of any cost-effective voluntary conservation objectives adopted by individual States or subdivisions thereof . . .”¹⁹

¹⁵§ 839b(h)(7).

¹⁶§ 839 b(h)(7)(A)(B)(C).

¹⁷16 §839b (h)(8)(B).

¹⁸§839b(e)(1).

¹⁹§839d(1)(B).

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-011
RECEIPT DATE: OCT 0 1996



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600 • (206) 407-6000 • TDD Only (Hearing Impaired) (206) 407-6006

September 26, 1996

Mr. Thomas McKinney
Bonneville Power Administration
PO Box 3621
Portland OR 97208-3621

Dear Mr. McKinney:

Thank you for the opportunity to comment on the draft environmental impact statement (DEIS) for the Wildlife Mitigation Program (DOE/EIS-0246). We reviewed the DEIS and have the following comments.

This document provides a general overview of alternatives. Once site specific projects have been identified, a wetland analysis should be prepared for each specific site for Department of Ecology review.

If you have any questions, please call Mr. Dennis Beich with our Wetlands Section at (509) 625-5192.

Sincerely,

Rebecca J. Inman
Environmental Review Section

RI:
96-5335

cc: Dennis Beich, ERO
Heidi Renz, ERO



RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-012
RECEIPT DATE: OCT 01 1996

Rick Bass
3801 Vinal Lake Rd.
Troy, Montana 59935

September 25, 1996

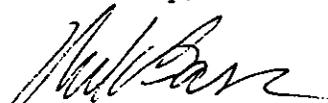
Thomas McKinney
D.O.E
Bonneville Power Administration
P.O.Box 3621
Portland, OR 97208-3621

Dear Thomas McKinney:

I am writing to comment ^{ON} ~~of~~ the Draft EIS regarding the mitigation of wildlife habitat loss caused by development of the Columbia River Basin. The most destructive wildlife habitat loss that I am aware of in the region has occurred with the construction of Lake Koocanusa, effectively isolating the genetics of the Yaak Valley in extreme northwestern Montana--a valley that was once connected directly to the Glacier ecosystem. I recommend that funds be used to purchase the river bottom lands now glutting the market as the timber companies (having clearcut these lands given to them, indirectly, by the government) flee, leaving subdivisions behind in an already stressed system.

Thank you. Plum Creek is the timber company offering these lands for sale.

Sincerely,


Rick Bass



Northwest Environmental Defense Center
10015 S.W. Terwilliger Blvd., Portland, Oregon 97219
(503) 768-6673 Fax - (503) 768-6671

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

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-013
RECEIPT DATE: OCT 02 1996

October 1, 1996

Re: Wildlife Mitigation Program DEIS

Dear Public Involvement Manager:

Thank you for the opportunity to comment on the Wildlife Mitigation Program DEIS. On behalf of Northwest Environmental Defense Council we urge you to consider our recommendations.

I. OVERALL COMMENTS

BPA has a strong obligation to protect and mitigate wildlife consistent with recommendations from the Northwest Power Planning Council. Pursuant to this goal, BPA must publish an EIS that translates that obligation into a program that works within the confines of law and regulatory authority and that effectively and safely reaches the goals of wildlife mitigation. Although we applaud BPA's effort in this DEIS to set forth alternative approaches that try to establish consistency amongst projects, we believe that the stated issues to be resolved in the DEIS were not adequately answered or explored. BPA in its compilation of the alternatives failed to demonstrate the recognition of key factors that could have a profound effect upon the implementation of the goals of those alternatives. In order to proceed with the process of selecting an appropriate alternative, BPA must address some important considerations. These considerations are: 1) the effect MOA funding cap will have on the goals and prioritization of management techniques within projects under each and all alternatives; 2) the degree of participation by the public; and 3) the degree of deference given to tribal authorities and agencies.

A. Impacts of Funding Limits

BPA needs to evaluate the possible influence the MOA funding cap will have on its goals and management implementation strategies in each alternative. The significant risk of impacts,

we believe, gives just cause to include this in your analysis. We believe it is imperative that you disclose the available resources, and how they will affect each alternative. BPA must be clear on how cost decisions affect where and how much it allocates funding and on what basis. BPA should decide specifically whether it is based on how much electricity is needed or whether salmon management will affect availability of funding for other projects. The Northwest Power Act states that, "(h)(8) [t]he [Planning] Council shall consider, in developing and adopting a program [for mitigation]. . . (D) [m]onetary costs and electric power losses resulting from the implementation of the program shall be allocated by the Administrator consistent with individual project impacts and systemwide objectives of this subsection" (16 USC 839b). BPA must consider the impacts of these cost decisions and must acknowledge them openly before any true evaluation of objectives for wildlife mitigation can be performed.

The cost ramifications present an evident problem with prioritization. The risks of the elimination of wildlife mitigation techniques under the influence of cost concerns are not confronted in this DEIS. We strongly urge that they should be addressed. BPA includes in its objectives for resolving issues in the DEIS: "Achievement of cost and administrative efficiency," (p. 1 of Summary). Stated as one of the issues to be resolved is "[w]hether and to what extent BPA should prescribe conditions for funding types of wildlife mitigation actions," (p. 8 of Summary). This issue is not resolved. Some of the alternatives state that a cost analysis will be involved, but they don't specify how. The public has no means of reasonably predicting how the cost analyses will affect mitigation priorities within each alternative.

B. Public Participation

BPA needs to stipulate how much public involvement there will be under each alternative. In step 2 of the stated prescriptions under all action alternatives, BPA describes the individuals' involvement in the input process as "similar to the project scoping and public involvement that occurs in a NEPA analysis," (p. 2 of Summary). We need to know to what extent the two are similar. The extent of public involvement under each alternative needs to be expressed in the DEIS if it is to replace NEPA's familiar and tested public input requirements. We understand BPA's efforts to enhance the efficiency of the mitigation process. However, in any proposed alternative for mitigation, the possible mechanisms for input should be discussed and evaluated.

C. Role of Tribes and Agencies

We see no attempt to address the role of tribes and agencies within each alternative. The role is addressed generally in the DEIS, but is not specified in each alternative. It is not sufficient to state that tribes and agencies are involved. There must be communication as to what kind of role, how extensive the role, and the differences between the alternatives regarding that role.

Because of their expertise in their respective fields, Tribes and agencies should have complete deference in the decision-making process. Included in BPA's required eight step planning process is *one* step devoted to input from Tribes, agencies and the interested public. Instead of dealing with these important and helpful groups in one step of the plan, their involvement should be integrated into the entire eight step ecosystem planning process. This

allows their input to benefit the entire process, not just at the beginning, with the project managers' option of returning for input during the later steps.

We feel their expertise is so important that there should be included a separate alternative which constructs a regional entity made up of managers selected from fish and wildlife groups, agencies and tribal authorities. This entity would be given full discretionary power over all decisions, and BPA would act as a financial conduit, funding all projects required by this entity. This alternative is a logical option to include among those already defined in the DEIS because it is most consistent with the goals of wildlife mitigation. While BPA has the responsibility for wildlife mitigation, these groups are more experienced to properly handle this responsibility.

II. SPECIFICS

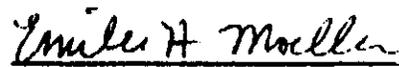
BPA has a responsibility to make the DEIS clear to the public reader. "Environmental impact statements shall be written in plain language and may use appropriate graphics so that decisionmakers and the public can readily understand them." 40 CFR 1502.8. The following are examples of specific problems that may confuse the reader.

*Table 1-1 (p. 4) This table represents present priorities, yet its function in the DEIS among the alternatives is unknown.

*Table 2-3 (p.36) Under Alternative 5, and under the topic "Compliance with Laws and Regulations," the statement, "[m]ay be inconsistent with agency statutory authorities," is never explained anywhere in the DEIS.



Alexis DeCaprio, NEDC Volunteer



Emilee H. Moeller, NEDC Volunteer

FAX TRANSMITTAL SHEET

Northwestern School of Law of Lewis & Clark College

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OCT - 2 1996

TO: BPA - Public Involvement Meetings

FAX number: 230-4019

FR: NEDC Volunteers

FAX number: (503) 768-6671

Number of pages (including this cover sheet): 4

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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

September 23, 1996

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-014
RECEIPT DATE: OCT 03 1996

Mr. Thomas C. McKinney
Bonneville Power Administration
Post Office Box 12999
Portland, Oregon 97212

Dear Mr. McKinney:

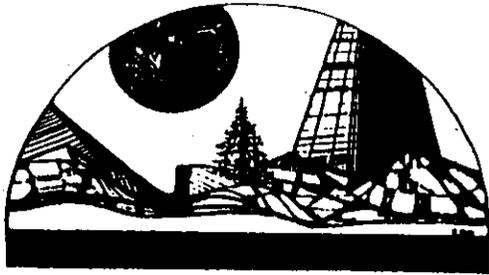
The Washington Department of Fish and Wildlife would like to thank the Bonneville Power Administration for pursuing the development of the Wildlife Mitigation Program Draft Environmental Impact Statement, DOE/EA-0246 (EIS). This standardized approach should significantly reduce the amount of time to implement wildlife mitigation projects in the Columbia Basin, as well as provide a way to ensure consistency. The Department also appreciates the efforts to expedite the National Environmental Policy Act review of the Vancouver Lowlands Project by including it in this document.

Specific comments pertaining to the EIS from this agency have been incorporated into the response from the Wildlife Working Group. The Department endorses the comments the group has submitted.

Sincerely,

Bern Shanks, Ph.D.
Director

BS:JR:slt



FRIENDS OF THE WILD SWAN
P.O. BOX 5103
SWAN LAKE, MT 59911

October 1, 1996

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

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: WMP 02-015

RECEIPT DATE: OCT 03 1996

RE: Wildlife Mitigation Program DEIS comments.

Dear Mr. McKinney:

Please accept the following comments on BPA's Wildlife Mitigation Program DEIS on behalf of Friends of the Wild Swan and Montana Ecosystems Defense Council.

1. We do not believe that the information contained in this DEIS is a substitute for NEPA on site-specific projects. As a programmatic document this sets the side-boards for a NEPA analysis on individual projects. The wide variety of wildlife, landtypes and existing impacts, etc. throughout the Columbia River Basin make it impossible to cover all possible scenarios in one EIS.

2. Please clarify what you mean by reintroduction of wildlife species. Does this include hatchery stocking of fish?

3. Please clarify why predator control would be necessary in any scenario proposed by BPA. Predators are a natural part of the ecosystem and have been unfairly exterminated throughout the west, mostly to accomodate cattle and sheep grazing. Why does BPA need to involve itself in predator control?

4. Define nuisance animals. Define unwanted or competing vegetation, are these noxious weeds? or native plant species that BPA might find undesirable?

5. Please refer to recent economics studies conducted throughout the northwest such as Economic Well-Being and Environmental Protection in the Pacific Northwest A Consensus Report by Pacific Northwest Economists, December 1995, and Lost Landscapes and Failed Economies by Dr. Thomas Power, 1996. Natural resource extraction is not the driving force behind economic vitality in the northwest.

6. The Inland Native Fish Strategy (INFISH) is only being applied on Forest Service lands, not BLM lands. PACFISH does apply to both agencies.

7. Please define decommissioning of roads. The definition should consist of removing culverts and excavating the fill down to the natural stream channel and involve total re-contouring of the affected lands.

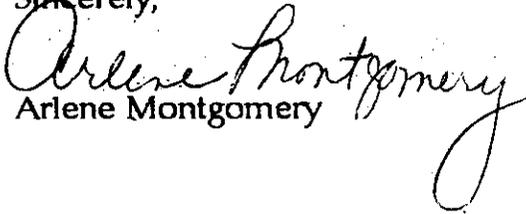
8. Please define necessary and unnecessary roads. What criteria will be used to determine whether a road is necessary or unnecessary? This should include existing and planned roads.

9. Roads should not be constructed in the floodplain or along stream/river channels.

10. Monitoring requirements for INFISH are primarily limited to verifying whether the standards and guidelines are being applied. Monitoring to determine the effectiveness of the measure outlined in INFISH are given a low priority. Monitoring the validity of the assumptions used in developing INFISH will not be done. Please clarify this in your document.

Please keep us involved as your NEPA process continues.

Sincerely,


Arlene Montgomery

Wildlife Working Group

September 26, 1996

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

RE: DOE/EA-0246

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-016
RECEIPT DATE: OCT 08 1996

To whom it may concern:

Members of the Wildlife Working Group (WWG) met on August 14, 1996 to discuss BPA's Wildlife Mitigation Program Draft Environmental Impact Statement (DOE/EIS-0246). The WWG's major concerns with and comments on the Draft EIS are described below with corresponding recommended changes to the document.

Page 2, Section 1.3 BACKGROUND

Footnote ¹ under Section 1.3 on Page 2 needs to clarify BPA's requirement to act consistently with the Northwest Power Act. Revise the footnote so that it reads:

"While BPA does not embrace every provision in the Council's Program, BPA is required to act in a manner consistent with the Northwest Power Act. BPA uses the Program to guide ..."

Page 3, The Role of the Wildlife Working Group in the Mitigation Project Prioritization Process

Revise the bulleted paragraph on the top of Page 3 (the fourth bullet under Section 1.3 BACKGROUND) to clarify that the Wildlife Working Group will oversee the mitigation project prioritization process.

- "Development of a wildlife mitigation project prioritization process managed by the Columbia Basin Fish and Wildlife Authority² through the Wildlife Working Group³, with the ..."

Also, add the following footnote to define the Wildlife Working Group:

³ The Wildlife Working Group consists of representatives from state and federal fish, wildlife, and land management agencies; tribes; the BPA; and utilities. Representatives from the Columbia Basin Fish and Wildlife Authority, as well as from the U.S. Army Corps of Engineers, U.S. Bureau of Indian Affairs, U.S. Bureau of Reclamation, U.S. Forest Service, U.S. Bureau of Land Management, and U.S. National Park Service comprise the Wildlife Working Group."

(Note: The numbering of subsequent footnotes will need to be changed.)

Page 3, Inclusion of the Draft Wildlife Plan in Background Information/Update of EIS and Wildlife Plan

Under Section 1.3 BACKGROUND, add a bulleted paragraph that addresses the development of the Council's Wildlife Plan. The preparation of the Draft Wildlife Plan is an important step in the wildlife mitigation process and should be specifically mentioned. Add the following paragraph after the fourth bullet on Page 3:

- “Development of the Draft Wildlife Plan by the Wildlife Working Group (Council, 1995) which describes procedures for 1) standardizing and completing the existing wildlife loss assessments, 2) developing and implementing mitigation plans that will fully mitigate for wildlife losses, and 3) monitoring and evaluating mitigation activities to ensure mitigation success.

Also, add the following paragraphs to the end of Section 1.3 on top of Page 5 (prior to Section 1.4 Relationship to Other Documents):

“The Wildlife Plan, which defines the goals and objectives, and describes the methodologies for proceeding with the Wildlife Program, will provide guidance to BPA and to mitigation planners (States, tribes, federal agencies, and others). The Plan incorporates quality assurance procedures that address the technical quality of products and the consistency between region-wide efforts. The Wildlife Plan is also intended to provide a framework in which future biologists can continue to implement, monitor, and evaluate wildlife mitigation. The Plan will be finalized after the Wildlife Mitigation Program EIS is completed.

Both the Wildlife Mitigation Program EIS and Wildlife Plan will be updated as needed through future years to reflect current information, laws and regulations, and Wildlife Program goals.”

Page 10, The 8-Step Process

The 8-step process in Section 2.1.1 needs to emphasize flexibility and clarify that the steps can be followed in any order, as deemed appropriate by the project proponents. It is not clear at what point in the 8-step process lands would be purchased. The WWG is concerned that mitigation lands may be acquired by someone else before Project Managers address each step (thus mitigation options changing, and time and money spent in the planning process wasted). To clarify that the 8-step process is intended to be flexible and that land options will be protected until funding by BPA occurs, add the following words to the end of the second paragraph under Section 2.1.1:

“The eight steps described below are not necessarily intended to be followed in the order presented. For example, it is likely that Step 5 will be often be addressed prior to Steps 2, 3, and 4 during the planning process. Also, some steps may occur concurrently. The eight standard planning process steps are intended to be flexible; the order in which the steps are followed will be dependent on the specific Project Management Plan and the Contract Officer Technical Representative’s sign off that each step has been adequately addressed. BPA will likely channel funds for mitigation implementation after project goals are established, the area of interest/concern is defined, stakeholders are involved, historical and present site conditions and trends are established, and a statement of the desired future condition is developed.”

Page 12, 1. Define the Area of Concern/Interest

Project Managers will need a technical document that outlines how to conduct an adequate hazardous materials survey. Edit the fifth bulleted paragraph under 1. Define the Area of Concern/Interest to read:

- “...toxic wastes. A hazardous materials survey protocol, prepared or approved by BPA, will be available for use by Project Managers in the project planning process.”

Page 20, 7. Monitor Conditions and Evaluate Results (Alternative 4)

On top of Page 20 under 7. **Monitor Conditions and Evaluate Results (Alternative 4)** clarify that BPA will comply with the mitigation monitoring/evaluation goal of the Wildlife Program Rule. Include the following words:

“... efficiency alternative. However, as required by Section 11.4 of the Wildlife Program Rule, BPA will monitor and evaluate mitigation efforts to determine if projected benefits to wildlife result from mitigation efforts.”

Page 23, 6. Develop and Implement an Action Plan for Achieving the Goals (Alternative 5)

Edit the last bulleted paragraph so it reads:

- “To protect farm land, acquire lands not currently under commercial agricultural use.”

Page 25, 7. Monitor Conditions and Evaluate Results (Alternative 5)

Edit the first bulleted paragraph on top of Page 25 so it reads:

- “Monitor performance ... and natural resources (e.g., fish, wildlife, soils, water quality).”

Page 26, 2. Involve Stakeholders (Alternative 6)

Under 2. **Involve Stakeholders (Alternative 6)** on Page 26 move the first bulleted paragraph to 2. **Involve Stakeholders (Alternative 2)** on Page 12 since the identifying of a desired future condition will be applicable to all action alternatives.

Page 27, 5. Establish Project Goals (Alternative 6)

Edit the first asterisk of the second bullet in 5. **Establish Project Goals (Alternative 6)** so that it reads:

“protection of high quality native or other habitat or species of special concern (whether at the project site or adjacent to the project site), including ...”

Page 28, 6. Develop and Implement an Action Plan for Achieving the Goals (Alternative 6)

Under 6. **Develop and Implement an Action Plan for Achieving the Goals (Alternative 6)** edit the third bulleted paragraph to clarify that natural regeneration will be favored over active restoration:

- “Favor natural regeneration over active restoration where the same biological objectives can be achieved in a reasonable amount of time.”

Also, under 6. **Develop and Implement an Action Plan for Achieving the Goals (Alternative 6)** edit the sixth bulleted paragraph to distinguish between revenue gained on mitigation lands that will be channeled back to the mitigation projects to offset implementation costs versus those monies that may be generated that cannot be easily attributable to wildlife mitigation activities.

- “Dedicate to the project any site specific user fees or revenue gained from commerce that results from the exclusive use of the property. (Revenues generated from hunting licenses or other wildlife

recreation related fees which cannot be directly linked to wildlife mitigation activities or that is identified in site specific management plans will be excluded)."

Page 29, 6. Develop and Implement an Action Plan for Achieving the Goals (Alternative 6)

Under 6. Develop and Implement an Action Plan for Achieving the Goals (Alternative 6) edit the eighth bulleted paragraph on the top of Page 29 to clarify that the use of local supplies and labor may not be possible in all circumstances, but that it will be the preferred choice:

- "Encourage the use of available local supplies and labor to accomplish project goals and objectives."

Page 30, Table 2-1

In Table 2-1 on Page 30, the mitigation technique *Fee-Title Acquisition and Transfer* is given an infrequent occurrence rating. Since fee-title acquisition and transfer has in fact been a frequently used method of achieving wildlife mitigation in the past (and will likely remain a frequently used mitigation technique in the future), the WWG requests that this rating be changed under Alternative 6 from a "-" to a "*".

There are inconsistencies in the frequency use rating system throughout Table 2-1. For example, *Creating or Expanding Wetlands* is given a "*" under Alternative 6 while techniques that would likely be employed to achieve wetland creation goals (i.e., *Wells, Diversions, Check Dams/Impoundments, Pipelines, and Drainage Ditches*) are given a "-" rating. The WWG suggests that BPA review the assumptions on which these ratings are based and change the ratings as appropriate.

Also in Table 2-1, add an additional row under *MULTIPLE USE TECHNIQUES* on Page 32 to more explicitly represent public use interests. Label this new row "*Public Use Management*".

Page 42, Section 3.8 CULTURAL AND HISTORIC RESOURCES

Add "pasturing livestock" to the list located in the last sentence of the first paragraph under Section 3.8. Pasturing livestock also is historically significant to tribes in the Columbia River Basin and needs to be included in the list.

Between Pages 42 and 43, Figure 3-5

Figure 3-5 (between Pages 42 and 43) is difficult to read and may not accurately represent the areas of interest of each tribe. The WWG would like Figure 3-5 to be removed from the EIS and the following words added after a fifth bullet under Section 4.6.4 on Page 90 to explain how tribal interests within the Basin will be addressed.

- "Project Managers will coordinate project activities with the appropriate and affected tribe(s) to ensure that tribal interests are addressed."

Page 43, Section 3.9 ECONOMICS

Recreation and tourism are major sources of revenue in the Columbia River Basin and should be mentioned. Revise the first sentence of the first paragraph under Section 3.9 on Page 43 to read:

“Major sources of employment include agriculture, forestry, recreation/tourism, real estate, retail, services, and government.”

Page 54, Section 4.2.1 Context

Tribes have legal authority over the protection, use, and management of water resources. Revise the first sentence of the second paragraph under Section 4.2.1 to read:

“Several state agencies and tribes also have regulatory authority ...”

To further clarify the role of the tribes in managing water resources on Page 55, add after “9. Wyoming Environmental Quality Department: regulates water quality and use.”:

10. **Indian Tribes:** some tribes regulate water quality and use.

Page 59, Water Distribution Techniques

Edit the second paragraph under **Water Distribution Techniques** to read:

“Development of culverts with elevated outfalls (greater than 1 m, or 3 ft.) can add to downstream sediment loads and potentially block fish passage.”

Page 93, Section 4.7.3 Impacts of Techniques, Land Acquisition Techniques

The government usually pays taxes on lands that they acquire. This first sentence of the second paragraph under Section 4.7.3 does not reflect this. Change sentence to read:

“For fee-title acquisition of private property, the property may be converted from taxable private ownership to nontaxable governmental ownership. Property and other taxes may be lost to the county and state in which the property is located and possibly to established special districts that receive funds from tax assessments. However, federal and state land management agencies commonly do make payments to counties. When governmental agencies make payments to counties, it is done as in-lieu payments or other payments which generally compensate the county for any potential revenue loss. Severity of the impact ...”

Page 97, Section 4.7.4 Potential Program-Wide Mitigation Measures - Economics

It may not be feasible to always use local supplies and labor to accomplish project goals and objectives. Change the first bullet to read:

- “Encourage the use of available local supplies and...”

Page 103, Section 4.8.4 Potential Program-Wide Mitigation Measures - Recreation/Visual

Emphasize that reintroduction of species will not occur near important public use areas. Edit the third bulleted paragraph on Page 103 to read:

- "For projects involving the reintroduction of threatened or endangered species, establish reintroduction sites consistent with species management and/or recovery plans."

Page 110, Section 4.10.2 Cumulative Impacts of All Future Wildlife Mitigation Projects Considered Together with Past, Present, and Future Human Actions in the Columbia River Basin

The last paragraph under Section 4.10.2 (Page 110) which addresses the cumulative benefits of wildlife mitigation activities is weak. Edit the last paragraph under Section 4.10.2 so it reads:

"Wildlife mitigation activities will have numerous beneficial effects on the wildlife and other resources throughout the Columbia River Basin. For example, the process of securing and managing lands for wildlife would provide both short-term and long-term benefits to wildlife. The acquisition of lands for wildlife will protect existing wildlife habitat values and ensure habitat availability for wildlife species in the future. Human populations would also benefit from lands acquired for wildlife as opportunities for recreation (e.g., wildlife viewing) are maintained. Acquisition of private lands also provides additional protection of cultural resources not required of private land owners.

Plant propagation also will benefit resources within the Basin. Plant propagation techniques (e.g., seeding, planting) will increase vegetative diversity, thus providing wildlife with greater habitat diversity. Also, plant propagation will decrease soil erosion by stabilizing exposed soils. This will benefit water quality which is important to fish and wildlife, as well as to human populations. The removal of livestock will improve habitat conditions, increasing wildlife populations.

Habitat restoration/enhancement techniques will also benefit fish, wildlife, and human populations. Where wetland habitats are restored or enhanced, the quality of ground and surface waters is expected to improve. Restoration of wetlands may also raise groundwater levels (which may allow agricultural practices to occur with less irrigation or result in new naturally occurring vegetated areas) and buffer the effects of floods. Island restoration and other habitat enhancement projects will increase habitat diversity, thus benefiting wildlife populations.

Water development, management, and distribution techniques will bring water to areas previously without water. These new sources of water will benefit wildlife populations and the increased presence of vegetation will improve wildlife habitat diversity. Opportunities for agricultural development may be extended which will generate revenue and provide habitat for certain wildlife species.

Vegetation management techniques will help control invasive species which are currently limiting vegetative diversity. Thus, wildlife will benefit from improved habitat diversity. The re-establishment of native species will benefit fish and wildlife, as well as traditional Native American cultural uses. Implemented fire management techniques will help protect wildlife habitats and areas of human concern (e.g., facilities) from the risk of high-intensity fires. Prescribed burns will benefit wildlife by creating and maintaining habitat diversity.

Species management techniques such as species introductions or the control of certain species will be beneficial by creating a more natural ecosystem in the Columbia River Basin. The reintroduction of certain species will help ensure their long-term survival. Humans will benefit from these efforts as well since the intrinsic and aesthetic values of wildlife will be preserved for future generations.

Multiple use techniques implemented in conjunction with wildlife mitigation activities will also provide benefits to resources throughout the Columbia River Basin. For example, grazing by cattle

and crop production will create and maintain habitats used by certain wildlife species. Timber management and will also maintain habitat types required by wildlife species while also providing economic benefits. The preservation of undeveloped areas in the Basin will provide short-term and long-term benefits to wildlife habitat and populations, protect aesthetic values, and provide recreational opportunities.”

Appendix A, Page 1, Section 1 RESOURCE ACQUISITION TECHNIQUES

Under Section 1.2.2 on Page 2 of Appendix A, the statement that easement acquisition is “usually less expensive than fee-title and transfer” is not true. Easement acquisition has been determined to be less expensive in the short-term, but is more costly in the long-term (when Operation and Maintenance costs are considered). The WWG wants all the **General Benefits** and **General Drawbacks** sections under 1. **RESOURCE ACQUISITION TECHNIQUES** to address short-term and long-term costs.

This cost determination is based on the following documents:

Oregon Trust Agreement Planning Project: Potential mitigations to the impacts on Oregon wildlife resources associated with relevant mainstem Columbia River and Willamette River hydroelectric projects. February 1993. Project Coordinators: Oregon Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Indian Reservation, Burns Paiute Tribe, Oregon Natural Heritage Program. Report to the Bonneville Power Administration and the U.S. Department of Energy.

U.S. Army Corps of Engineers. 1983. Special Report for Congress Lower Snake River Fish and Wildlife Compensation Plan. U.S. Army Corps of Engineers. Walla Walla District. Walla Walla, Washington. March 1983.

Habitat Creation vs. Habitat Enhancement/Restoration

The phrases “wetland creation” and “habitat creation” are no longer commonly used; instead management activities related to wetlands and other habitats are now referred to as “restoration” or “enhancement” projects. Throughout the EIS (especially in Chapter 4), change references to wetland creation and habitat creation to wetland restoration/enhancement and habitat restoration/enhancement. Specific locations throughout the EIS where this edit would apply include:

Page 30, Table 2-1 (**HABITAT CREATION AND CONVERSION, Creating or Expanding Wetlands**)

Page 47, **Alternative 5**, second paragraph, second sentence

Page 48 (**Habitat Creation and Conversion**)

Page 63, fourth bulleted paragraph from the top (“*For projects involving wetland and/or island creation...*”)

Page 63, fifth bulleted paragraph from the top (“*For projects involving wetland creation...*”)

Appendix A, Pages 5 and 6: **3 HABITAT CREATION AND CONVERSION.**

Fee-Title Acquisition and Transfer

Fee-title acquisition and transfer are not one and the same; one technique may be implemented apart from the other to achieve wildlife mitigation goals. Therefore, “fee-title acquisition and transfer” should be considered different techniques in the EIS and discussed separately. Throughout the EIS, change “Fee-Title Acquisition and Transfer” to “Fee-Title Acquisition” and “Fee-Title Transfer” and address appropriately. Specific locations throughout the EIS where this edit would apply include:

Page 30, Table 2-1

Appendix A, Page 1, Section 1.1.

If you have any questions or comments regarding the Wildlife Working Group's recommended changes to BPA's Wildlife Mitigation Program Draft EIS, please contact me.

Sincerely,



10/1/96

Chris Merker, Chair
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re: Wildlife Mitigation Program DEIS

Dear : Mr. McKinney,

Thank you for allowing The Ecology Center and the Alliance for the Wild Rockies to comment on the BPA's Wildlife Mitigation Program Draft Environmental Impact Statement. Here are our comments.

General Comments

We find the DEIS to be totally inadequate for the scope of this proposal. The scientific analysis, in the rare cases in which it can be found, is at best horrendous. The analysis team should be ashamed. Considering the massive geographic scope of this proposal, 144 pages of analysis does not even come close to the proper amount of time and study needed to create a comprehensive set of regulations. It is our general feeling that BPA should throw this DEIS in the trash and a new analysis undertaken.

Purpose And Need

The DEIS states that "...because this EIS explores, identifies, and discloses many of the environmental impacts expected from mitigation projects, individual projects may not require further National Environmental Policy Act (NEPA) review." (DEIS, pg. Summary/1) NEPA was created to ensure that all federal agencies managing lands in the public trust did so in an environmentally sound manner. We are firmly opposed to any attempt by the BPA to circumvent, streamline, or in any other way alter the NEPA process. So too are the courts. In *Natural Resources Defense Council Inc. v. Morton*, the court correctly points out the illegality of replacing the NEPA process with a programmatic document such as this:

A program statement may be very helpful in assessing recurring policy issues and insuring consideration of the cumulative impact that numerous decisions might have on the environment, but that does not mean that it will suffice to fulfill the NEPA mandate. The court is convinced that the...programmatic statement alone, unrelated to individual geographic conditions, does not permit the "finely tuned and 'systematic' balancing analysis" mandated by NEPA.¹

Since this EIS is in clear violation of NEPA, it should be dropped from consideration, or it must be modified in such a way that it does not circumvent, hinder, or in any other way violate NEPA. Further more, it must explicitly state that the NEPA process, in its entirety, will be applied to each individual proposal.

¹ (1) *Natural Resources Defense Council, Inc. v. Morton*. 388 F.Supp. 829, 527 F.2d 1386 (D.C.Cir.1976)

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We also take issue with the inclusion of local economic considerations, grazing, timber harvest, and other resource extraction activities in any document meant to deal with mitigating the destruction of wildlife habitat caused by the hydro-electric development of the Columbia River Basin. In virtually every case, the interests of these activities come into direct conflict with those of wildlife and the desire to protect and rehabilitate wildlife habitat. The Final EIS (FEIS) must remove such considerations from its analysis.

We also take issue with the purpose 2 as listed in the DEIS "Achievement of cost and administrative efficiency." (DEIS pg. 1/2) Aside from the aforementioned NEPA violations caused by a desire to "streamline" the administrative process, such a consideration will inevitably run in direct contradiction of many wildlife mitigation proposals. Although consideration of this issue should be included in the analysis, it should not be a driving purpose behind this DEIS. We request that it be removed from the list of primary objectives upon which the BPA will "...base its choice among alternatives" (DEIS pg. 1/2) presented in the FEIS.

Alternatives

The alternatives presented in the DEIS are completely misleading. Alternative 3, the mis-named "Biological Objectives Emphasis," the BPA purposes to allow the use of herbicides, pesticides, and ground disturbing activities. Unless the "biological objective" is to poison virtually every species of flora and fauna, every watershed, and the air of the project area, how does this benefit the biology of anything at all? The madness continues under Alternative 5, better known as the "General Environmental Protection" alternative, which, the DEIS informs us, is the "environmentally preferred" alternative. If logic, the general rules of linguistics, and Webster's Dictionary applied to this DEIS, one would assume that this alternative would eliminate practices detrimental to the environment. But, alas, such staples of reality clearly do not apply (or did not occur) to the BPA when formulating this DEIS. In fact, this alternative asserts that practices such as logging, grazing, mining, and general ecosystem destruction are environmental resources, since they contribute to "...local economic productivity!" (DEIS 2/20) Perhaps the BPA could explain to the public how "economic productivity" fits into an ecosystem. Is it some form of life or biological process my 8th grade biology teacher failed to mention? If so, please provide the scientific documentation for such an assertion. Both we, and Charles Darwin, would be most interested in reading about this new form of environmental resource.

Clearly resource extraction activities are detrimental to the environment, and must be eliminated from any alternative which proposes to meaningfully address environmental concerns.

The DEIS proposes to continue the long standing use of logging as a deterrent to fire. In fact there is a growing body of evidence that logging increases the risk of wildfire. A Forest Service General Technical Report, ("Historic and Current Forest Landscapes in Eastern Oregon and Washington. Part II Linking Vegetation Characteristics to Potential Fire Behavior and Related Smoke Production" by Huff, Ottmar, Alvarado, Vihnanek, Lemkkuhl, Hessburg, & Everett; PNW-GTR-335, October, 1995) states:

In general, rate of spread and flame length were positively correlated with the proportion of area logged . . . All harvest techniques were associated with increasing rate of spread and flame length . . .

The aforementioned paper has many other implications to lead us to believe that actions such as this will actually increase the risk to private landowners in the area, and increase the intensity of watershed-damaging wildfires in the area, in contradiction to the DEIS's claims. In carrying out these types of fire suppression activities, these false pretenses, you would

actually endangering the public in the area and the forests owned by the public.

Economic considerations are not to be dismissed. According to the Congressional Research Service, the U.S. taxpayers would have to spend approximately 3.5 billion dollars in order to reduce fuels in only ten percent of our national forests.² Considering the historic ineffectualness of fire suppression methods (the yearly wildfires in "treated" areas stand as a good testament) and the increase in probability and intensity of wildfires after fire suppression related logging, such activities should be dropped from the DEIS. The BPA should replace these dated, expensive methods with an attempt to reintroduce historic fire patterns into the area.

Grazing has arguably been one of the most damaging activities to have occurred in the West.³ Cattle wastes have historically caused massive degradation of water quality, plant biodiversity, and riparian areas and the species dependent on clean, intact riparian areas. More recently, studies have indicated that grazing has had a major impact on the ecological processes which normally maintain the ecosystems health. One such area is the role of fire in the ecosystem. Studies indicate that heavy grazing, which virtually all grazable areas of the west have experienced, has dramatically decreased fire frequency and intensity, giving rise to major changes in the plant make up of most grassland areas in the west.⁴ Grazing has also impacted plant regeneration, retarding the growth of certain tree species while encouraging the growth of others, thus causing traditional plant makeups to be replaced.⁵

We oppose all action alternatives on the grounds that no single alternative would provide a comprehensive set of guidelines for the protection of the analysis area in its entirety. We request that the BPA use the comments and suggestions presented here to draft a real "General Environmental Protection" alternative which precludes resource extraction activities, use of harmful chemicals, road building, and provides for the protection of all facets of the ecosystem.

Soil, Water Quality, Fisheries, Wildlife and TES Species Habitat

The DEIS contains no information on the current conditions on current conditions of soils, water quality, fisheries, and wildlife and TES species habitat in the analysis area. How does BPA expect to be able to create a comprehensive set of standards and guidelines for project managers to follow

² (2) See Congressional Research Service, 1994. "Forest Fires and Forest Health Activities" Memorandum from Ross W. Gorte, Sept. 26, 1994. Library of Congress, Washington D.C.

³ (3) See Fleischner, T. L. 1994. "Ecological Costs of Livestock Grazing in Western North America." *Conservation Biology* 8(3):629-644.

⁴ (4) For a discussion on fire and grazing, see:
Agee, J. K. 1994. "Fire and Weather Disturbances in Terrestrial Ecosystems of the Eastern Cascades." General Technical Report PNW-320. Pacific Northwest Research Station, Portland, Oregon.
Cooper, C. F. 1960. "Changes in Vegetation, Structure, and Growth of Southwestern Pine Forests Since White Settlement." *Ecological Monographs* 30(2):129-164.
Madany, M. H., and N. E. West. 1983. "Livestock Grazing-Fire Regime Interactions within Montane Forests of Zion National Park, Utah." *Ecology* 64(4):661-667.

⁵ (5) For a discussion on regeneration and grazing, see:
Arnold, J. F. 1950. "Changes in Ponderosa Pine Bunchgrass Ranges in Northern Arizona Resulting from Pine Regeneration and Grazing." *Journal of Forestry*. 48:118-126.
Eissenstat, D. M., J. E. Mitchell, and W. W. Pope. 1982. "Trampling Damage by Cattle on Northern Idaho Forest Plantations." *Journal of Range Management* 35(6):715-716.
Karl, M. G., and P. S. Doescher. 1993. "Regulating Competition on Conifer Plantations with Prescribed Cattle Grazing." *Forest Science* 39:405-418.

if the DEIS does not mention these issues? Without an in-depth analysis of these issues, the BPA can not provide planners with a proper baseline for project implementation. The Final EIS must include a specific analysis of each of these issues, including maps for habitat (both current and potential) for all TES plant and wildlife species and for all sensitive and proposed for listing fish species. The Final EIS must also stipulate how these standards will conform to INFISH and PACFISH guidelines. Since such a major rehauling of this analysis is required, the following is a discussion of the issues which must be brought up in regards to each of these areas. Note that these issues are not to be considered totally exhaustive, but rather a beginning point from which the BPA's analysis team should start from.

Wildlife

We are requesting comprehensive effects analyses for each of the proposed activities on all forest management indicator species, with special emphasis on elk. Specifically, the analysis should address the following questions:

- (1) What are the species-specific habitat losses expected to occur as a result of implementing each alternative?
- (2) What effects will project activities have on the distribution and movement patterns of wildlife?

We request projections of effects on these species habitat area-wide as a result of the proposal. The analysis should show that the indicator species identified in the DEIS are in fact appropriate indicators of environmental changes in these areas for this type of project. If the biologists feel it is appropriate to document impacts using substitute species, they should accompany such a substitution with reasonable justification.

Finally, we ask that you adequately evaluate the impacts of the proposed timber sale on ungulate habitat, hunter opportunity, wildlife habitat fragmentation, biological diversity, and ESA listed species.

Threatened, Endangered, and Sensitive Species

We are gravely concerned about possible impacts on threatened, endangered, and sensitive species. The environmental analyses must assess how the timber sale proposals modify these habitats, specifically addressing the following questions:

- (1) Would the projects contribute to the extinction of threatened or endangered species?
- (2) What specific effects will the alternatives have on habitat for threatened, endangered, and sensitive species?
- (3) What are the results of surveys in the areas for bald eagles, grizzly bears, grey wolves, peregrine falcons and any other threatened, endangered, or sensitive species which may use the habitat in the analysis areas?
- (4) What are the habitat losses expected to occur as a result of implementing each alternative?
- (5) The project analysis must disclose possible habitat losses to ESA listed species. For all listed species and particularly the grizzly bear, we expect to see formal consultation with the U.S. Fish & Wildlife Service initiated and documented.

Thorough surveys for threatened, endangered, and sensitive species and management indicator species must be conducted before NEPA documents are finalized so that effects can be expressed in terms of populations and habitat acres, and the public has an opportunity to comment on the adequacy of proposed mitigation. Additionally, potential effects must be expressed both in terms of local populations and overall populations and distribution of the species in question. Research by Allendorf, Harris, & Metzgar* shows that a minimum viable population of grizzly bears in the Northern Rockies is between 1,670-2,000 bears, much higher than previously thought. The land area required to support this number of bears, based on even the most conservative approach (e.g. extrapolating the highest known densities across all habitat types) indicates that over 15 million acres of undisturbed habitat is required; more than in all the identified recovery zones for bears. A more realistic figure is somewhere around 25 million acres. This means that all currently suitable habitat must be protected, and corridors linking the

subpopulation areas must also be protected. We request that the BPA include a stipulation that a thorough site-specific consideration of this new research for each proposed project.

**Allendorf, F.W., Harris, R.B., & Metzgar, L.H. Estimation of effective population size of grizzly bears by computer simulation. In proceedings, Fourth International Congress of Systematic and Evolutionary Biology.*

Water Quality and Fisheries

We request a careful analysis of the impacts to fisheries and water quality, including considerations of (1) sedimentation, (2) increases in peak flow, (3) channel stability, and (4) increases in stream water temperature. The cumulative effects analysis should address the condition of the streams in relation to all past management activities, as well as considering the present proposal. We request that the environmental analysis disclose the locations of seeps, springs, bogs and other sensitive wet areas, and the effects on these areas of the project activities.

Where livestock are permitted to graze, we ask that you assess the present condition and continue to monitor the impacts of grazing activities upon vegetation diversity, soil compaction, streambank stability, and subsequent sedimentation. We further request that you refrain from conducting timber harvesting activities in riparian areas and that no new stream crossings be constructed in any of the drainages. We are concerned that the current proposals are likely to cause sedimentation and adversely affect water quality and sensitive fish species such as bull trout. We are very concerned that the BPA will not be able to execute this plan without degrading the aquatic environment to an unacceptable extent. If computer models are used to assess watershed effects (such as the R-1/R-4 WATSED model) we ask that the model assumptions used to determine Equivalent Clearcut Acres (ECA) be explained. Also, we request that all cumulative effects be modeled, including mining, grazing, road building, timber cutting, and agriculture.

Inventoried and uninventoried roadless lands

Many of the above issue headings relate to management of roadless lands catalogued in the RARE II process and later roadless area reviews under individual forest plans. However, it is essential that any project analysis contain a detailed consideration of the impacts to inventoried roadless land within the project and analysis areas. AWR and TECI are extremely concerned with the incremental erosion of roadless lands in a manner that circumvents the NFMA-designated process to permit Congress the final decision regarding land suitability for Wilderness designation. The Forest Service is discouraged from selling timber in roadless areas, and is required to meet a high standard of review when sales within roadless areas are proposed.

In light of currently proposed bills before Congress, in particular the Northern Rockies Ecosystem Protection Act, the FEIS should include a stipulation that will exclude timber harvest activities in roadless areas. Roadless areas serve as protective reserves that sustain many of the values mentioned in other areas of these comments, and as such should be deleted from consideration in timber sale proposals.

Biological Corridors

A recent court ruling, *Marble Mountain Audubon v. Rice* (No. 90-15389, D.C. No. CV89-170-EJG, Sept. 13, 1990) interprets NEPA to require the Forest Service to consider biological corridors. The standard for such a review is the same "hard look" NEPA requires of other environmental effects. We are requesting that the FEIS analyze the effects of each of the alternatives on possible biological corridors in the project areas, including species-specific assessments of corridor location and use. This assessment should place emphasis on the migration corridors for MIS and TES species, especially grizzly, wolf, wolverine, and elk.

Soils

Consideration of soil stability and regeneration capacity should include:

- (1) Are there any areas of unstable soils which could result in mass movement, and will any proposed activities occur in these areas or soil types? The soil types in the project area should be disclosed and management areas unsuited for timber harvest with sensitive soils eliminated from ground disturbing activities.

(2) How much soil compaction and surface erosion has occurred in the proposal area because of past actions, and what will the likely erosion increases be for the alternatives proposed?

(3) What has been the actual effectiveness of proposed BMPs in preventing sediment from reaching water courses?

(4) What BMP failures have been noted for past projects with similar landtypes?

Old-Growth

The DEIS makes no mention of old-growth stands, or how BPA plans to manage such areas. This is totally irresponsible on the part of BPA. Given the critical nature of this type of habitat for the continued survival of numerous species (Pine Marten and Goshawk to name but two), the BPA must complete a comprehensive analysis of old-growth and potential old-growth stands in the analysis area, and must also provide a plan for the management of such lands under its care.

In the identification process for old-growth habitat, the analysis team should perform on-the-ground verification of areas chosen from photo-interpretation and database examination. This is especially important in identifying areas appropriate for old-growth designation. This verification should assess how much old-growth exists in the compartments surrounding the analysis area, and what amount of old-growth would be affected in each alternative. The FEIS should describe the precise criteria used to designate old-growth on the forest, including who made the decisions regarding old-growth designations, and that person's qualifications.

Given that natural succession in old-growth tends to eliminate current old-growth stands, how will harvest of mature, non-old-growth stands as well as old-growth stands effect the future percentage of old-growth within the overall landscape? How will other "management techniques effect this percentage? We are firmly opposed to any reduction of the amount of old-growth in the project areas, given the small percentage of remaining public land old-growth habitat and its importance to sensitive wildlife species. The analysis should accurately describe the sizes of old-growth stands in the areas (through use of maps and tables) and assess whether they are of sufficient size to provide secure habitat for old-growth dependent species, including interior old-growth dependent species such as the pine marten and goshawks.

Roads

Once again, the DEIS provides absolutely no information on a central issue to the management of our public lands. The Final EIS must include a detailed section on roads and road building activities in the analysis area. The Final EIS must also include road density numbers and how they compare to the site specific standards of the area encompassed in this analysis. The following must be included in the analysis in regards to roads.

Road Density

The FEIS should assess the direct, indirect, and cumulative impacts of all road construction, reconstruction, and modifications of access management. The FEIS must stipulate that all road construction proposals must be accompanied by a complete analysis specifying the number of miles, location, cost, and quality of road construction. The FEIS must include the current and future open road density and total road density in the general project areas, including the analysis area. They should also include a description (with accurate maps and tables) of all roads—temporary, system, nonsystem, other public and private, etc. The analysis must also describe when unnecessary or temporary roads will be obliterated and revegetated, as required by NFMA. Locations of road closures should be revealed, the method of closure, and what if any traffic would be allowed on the "closed" roads. In addition, the BPA must examine the de facto effectiveness of its road closures, and explain how closure effectiveness will be ensured through proper monitoring.

Cumulative Effects

This is perhaps the most comic aspect of this DEIS. Despite the fact the enormous geographic region which this EIS attempts to cover, the BPA felt that it needed to only devote one and a half pages to the cumulative effects of all management decisions it will make in the future! The DEIS claims that

"...when examined within the broad geographic extent of the project area, adverse impacts of each project would be localized and relatively minor." (DEIS pg. 4/109) It seems that BPA has missed the point of a Cumulative Effects analysis, which is supposed to determine what effect such localized and minor impacts will have *cumulatively*, thus the name. The rest of the Cumulative Impacts section of the DEIS reads more like a definition of a Cumulative Impacts section, not like an actual analysis. This is completely inadequate. The DEIS should be withdrawn and the duties of conducting a meaningful analysis should be turned over to someone who can actually perform them, and not just paraphrase regulations regarding such an analysis. It should include an in-depth analysis of the past, present, and reasonably foreseeable future actions of the BPA, BLM, USFS, State and county land managers, and private individuals. This would mean contacting each of these entities to determine what they have, are and plan on doing. Considering the scope of this analysis, the reasonably foreseeable future should be defined at a minimum of 5 decades, not a single decade as the DEIS proposes.

Available Management Techniques

Appendix A does not disclose the full range of management techniques employed on lands considered under this analysis, nor does it disclose all of the effects of these management techniques. As mentioned earlier, this section does not disclose the ecologically detrimental of fire suppression activities, grazing, or logging. In fact, the DEIS fails to include timber harvest in Appendix A. Other management techniques which are ignored, and are totally deleterious to the environment are hard rock mining, oil and gas drilling, and the creation of hydro-electric and nuclear power facilities. A full disclosure of these and all other "management techniques" must be included in the FEIS. Full disclosure of all effects of the management techniques, including the biological, social, economic, and ecological effects must be included for each technique.

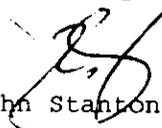
Maps and Appendices

The DEIS provides an inadequate number of maps, and the maps which are included provide little information of substance to the reader. We request that the pre-decisional document include detailed maps that disclose effects for all of the above mentioned issues. These maps should present information in a legible and logical format, and at a consistent scale such that different maps may be easily compared with one another.

Thank You

We request that both the Alliance for the Wild Rockies and The Ecology Center be kept on the mailing list for this and all other related projects. Once again, thank you for considering our comments.

Sincerely,



John Stanton



IDAHO FISH & GAME
600 South Walnut / Box 25
Boise, Idaho 83707-0025

Phil Batt / Governor
Jerry M. Conley / Director

September 30, 1996

Mr. Tom McKinney
Environmental Project Lead
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>UMP-02-018</i>
RECEIPT DATE: OCT 1-7 1996

Dear Mr. McKinney:

The Idaho Department of Fish and Game has reviewed the Wildlife Mitigation Program Draft Environmental Impact Statement. We feel the document will be beneficial in terms of streamlining implementation of wildlife mitigation projects around the region and will ultimately save the ratepayers of the northwest substantial money. In implementing the program, BPA must act in a manner consistent with the Northwest Power Planning Council's Columbia Basin Fish and Wildlife Program.

We have provided specific comments to the Columbia Basin Fish and Wildlife Authority Wildlife Working Group (WWG). The WWG has compiled comments from all members and will provide those under a separate cover.

Sincerely,

Cal Groen
Chief, Natural Resources Policy Bureau

cc. Rayola Jacobsen, NPPC



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

October 17, 1996

REPLY TO
ATTN OF: ECO-088

Mr. Thomas C. McKinney
Bonneville Power Administration
905 N.E. 11th Ave.
P.O. Box 3621 - ECN
Portland, OR 97208-3621

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-019
RECEIPT DATE: OCT 17 1996

Re: Bonneville Power Administration's (BPA) Draft Environmental Impact Statement (EIS) for the Wildlife Mitigation Program

Dear Mr. McKinney:

The U.S. Environmental Protection Agency (EPA), Region 10 has received and reviewed the above referenced draft EIS for review in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and under Section 309 of the Clean Air Act. Based upon our review, we are rating this document as EC-2, Environmental Concerns, Insufficient Information.

We are pleased that BPA is implementing substantial and ongoing wildlife mitigation in response to habitat losses from hydroelectric projects. Thus, we do not view your program as being negative from an environmental standpoint. Rather, our rating is intended to call attention to the fact that the reader would greatly benefit from having more information about BPA's wildlife mitigation program included within this EIS. We offer the following specific comments with respect to the document:

More information is needed. The EIS would be greatly improved by the inclusion of more background information about (1) the overall goals and direction for the Wildlife Mitigation Program; (2) the types of projects that have historically been pursued and the benefits derived from them; (3) any change in direction from that approach that these alternatives may represent; and (4) a description of the process and standards and criteria for selecting mitigation projects. Even though the Northwest Power Planning Council makes the selections, this is BPA's Wildlife Mitigation Program. The reader cannot make an informed judgement about the proposed alternatives or their impact without some context.

Is BPA interested in mitigating specifically for habitat types and species lost as a result of the dams, or is the intent simply to restore, improve, or protect what remains, regardless of what was lost with dam construction? What emphasis is being placed upon maintaining regional biodiversity? What proportion of mitigation dollars or projects are being focused on important upland habitats, e.g., old growth forest, shrub-steppe habitat, and

native grass and shrublands, vs. riparian areas and wetlands? What proportion of funds and projects are devoted to land acquisition and maintenance of natural habitats vs. restoration or manipulation of managed lands? How would each alternative change these emphases?

Table 1-1 in Chapter 1, page 4 lists Columbia River Basin wildlife mitigation habitat type and target species priorities. The description of Alternative 6, Chapter 2 page 27 states that project managers would include as project goals the "protection of high-quality native or other habitat or species of special concern", and the "protection or improvement of natural ecosystems and species diversity over the long term". We support these project goals, but there is no indication of the level of emphasis upon these vs. other goals.

Describe the means for establishing accountability for achieving environmental results. We think that the Standard 8-step Planning Process will provide a useful approach to program implementation. The process is systematic and includes important steps that should foster thoughtful and inclusive decision-making, provide a mechanism for establishing accountability, and enable learning and adaptive management. What has been the mechanism to establish programmatic accountability thus far? Has there been project follow-up in the past to determine results? Is an annual report prepared? If so, who reviews and responds to it? What will be the procedure for establishing accountability under the proposed approach?

The Preferred Alternative. We are concerned about the emphasis or lack of emphasis of Alternative 6 (BPA's Preferred Alternative) on specific wildlife mitigation techniques:

Land Acquisition. To be truly meaningful, a wildlife mitigation program of this magnitude should place significant emphasis upon the protection and maintenance of biodiversity. Land acquisition is an important tool for preventing further degradation and loss of intact native habitats and for safeguarding what remains.

For example, significant blocks of ecologically intact shrub-steppe habitat have become extremely rare as a result of conversion to agriculture, use for grazing, or conversion to other uses. Consequently, many plant and wildlife species found in shrub-steppe habitats have become rare; a great many are listed as state and federal endangered, threatened, sensitive, and candidate species. Land acquisition is the best way to ensure long-term protection of these habitats and species.

Our understanding is that land acquisition has been used frequently in the past with very positive results. We are concerned that Alternative 6 calls for infrequent use of this technique and states an intent to avoid removing land from the local tax or economic base. Hopefully, stakeholder involvement will help to resolve rather than increase the conflict over public vs. private landholdings. Meanwhile, we feel it is unwise to adopt broad programmatic policy that limits the use of land acquisition as a mitigation technique.

Herbicides, Fertilizers, and Predator Control. Alternative 6 calls for moderate use of herbicides, fertilizers, and predator control. We believe that the best wildlife mitigation will also serve to protect or re-establish ecological integrity. While the use of herbicides and fertilizers may often provide a quick and therefore relatively inexpensive "fix" to a problem, they do little to re-establish a self-sustaining ecosystem, which is also the most cost efficient ecosystem. We prefer to see infrequent use of these techniques. Predators are essential to any healthy, functioning ecosystem. We recommend that this technique not be used. If it is employed, only non-lethal methods should be applied.

Water Rights Acquisition. Only Alternative 3 emphasizes water rights acquisition as a mitigation technique. Since water rights are seriously over-allocated, it may be beneficial, for the purposes of fish and wildlife mitigation, to secure some of the excessively allocated water rights. We suggest further examination of the feasibility and cost-effectiveness of this technique.

We appreciate the opportunity to review and comment on BPA's Wildlife Mitigation Program and would be happy to provide further assistance. We commend you for all your positive efforts to provide wildlife habitat. We have enclosed a description of the rating given for this project. If you have any questions about the rating or these comments, please contact Elaine Somers at (206) 553-2966.

Sincerely,



Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.



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

October 10, 1996

ER 96/0552

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

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP 02-020
RECEIPT DATE: OCT 21 1996

Dear Ms. Loludman:

This letter is regarding the Bonneville Power Administrations (BPA) Wildlife Mitigation Program in Idaho, Montana, Nevada, Oregon, Washington, and Wyoming. The Department of the Interior (Department) previously provided a no comment letter on this project dated September 24, 1996. The following comments from the Bureau of Reclamation were received in this office after that date. Please include the following comments with the Department's comments.

The Department believes BPA's Mitigation Program would, together with other mitigation projects throughout the Columbia River Basin, provide net benefits to wildlife and other natural resources. The Department believes that based on the information presented in the DEIS that implementation of Alternative 6: Balanced Action, BPA's Preferred Alternative, would provide the greatest wildlife benefits for the following reasons:

1. Development of a programmatic NEPA planning process, consistent with the Northwest Power Planning Council's goals and priorities, would allow not only BPA, but other project managers as well, to implement wildlife mitigation programs in a more timely and cost effective manner. It will not require further review under the National Environmental Policy Act (NEPA) for many individual projects. Currently, all projects, including many projects similar in nature, require individual NEPA review which may add months to their completion.

However, we would like to emphasize each project would still require review and compliance with the Endangered Species Act, National Historic Preservation Act, and other applicable Federal, State and local ordinances.

2. Alternative 6 also proposes to reduce BPA's on ground

involvement and would allow project proponents to take
the lead in preparing project management plans.

Thank you for the opportunity to comment.

Sincerely

A handwritten signature in black ink, appearing to read "Preston Sleeper". The signature is written in a cursive style with a large initial "P" and "S".

Preston Sleeper
Acting Regional Environmental Officer



STATE OF WASHINGTON
DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT
OFFICE OF ARCHAEOLOGY AND HISTORIC PRESERVATION
111 21st Avenue S.W. • P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 753-4011

August 14, 1996

Mr. Thomas C. McKinney
Environmental Project Lead
Bonneville Power Administration
Post Office Box 3621
Portland, Oregon 97208-3621

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-021
RECEIPT DATE: AUG 20 1996

Dear Mr. McKinney:

Thank you for contacting our office regarding the DEIS on BPA's Wildlife Mitigation Program. We are very supportive of your idea to develop a Programmatic Agreement to assure cultural resources are addressed. We look forward to receiving the draft PA. Please feel free to contact me at (360) 753-4405 should you have any questions.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist

RGW:tjt

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Thank you for the opportunity to comment.

Sincerely

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Preston Sleeper
Acting Regional Environmental Officer



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August 14, 1996

Mr. Thomas C. McKinney
Environmental Project Lead
Bonneville Power Administration
Post Office Box 3621
Portland, Oregon 97208-3621

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: WMP-02-021
RECEIPT DATE: AUG 20 1996

Dear Mr. McKinney:

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Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist

RGW:tjt



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

DOE/BP-2965 MARCH 1997 1M

