

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: March 23, 2006

REPLY TO
ATTN OF: KEC-4

SUBJECT: Supplement Analysis for the Watershed Management Program EIS (DOE/EIS-0265/SA-256)

TO: Mrs. Dorie Welch - KEWU-4
Fish and Wildlife Project Manager

Project Title: Grande Ronde Model Watershed - Mahogany Creek Culvert Replacement

Project No: 1992-026-01

Watershed Management Techniques or Actions Addressed Under This Supplement Analysis (See Appendix A of the Watershed Management Program EIS): 1.13 Culvert Removal/Replacement to Improve Fish Passage, 2.1 Maintain Healthy Riparian Plant Communities, 2.11 Hand Pulling of Noxious/Invasive Vegetation

Location: Wallowa-Whitman National Forest, Wallowa County, Oregon

Proposed by: Bonneville Power Administration (BPA), U.S. Forest Service, Nez Perce Tribe and Grande Ronde Model Watershed Foundation

Description of the Proposed Action: BPA proposes to help fund a culvert replacement in the Wallowa-Whitman National Forest, in Wallowa County, Oregon that is currently blocking 3.5 miles of anadromous fish habitat. The current limiting factors within the Imnaha Subbasin include erosion/sedimentation, decreased flow, fish passage restriction and loss of habitat complexity. The Mahogany Creek culvert currently poses a total migration barrier. The main objectives of the proposed project include:

- Restore passage to all aquatic species;
- Increase habitat complexity;
- Increase access to refugia areas during high and low flow events; and,
- Decrease erosion from the road.

These objectives will be met by replacing the current Mahogany Creek culvert with an open-bottom arch culvert, installed at stream grade to simulate natural channel conditions. The existing culvert width is only 6 feet, while the bankfull width upstream of the culvert is 10.5 feet on average. The current outlet drop of this existing structure is approximately 2 feet. Inadequate installation of the existing culvert, coupled with its inadequate width and the relatively steep culvert gradient have caused the current situation with the culvert. In collaboration with USFWS and NOAA, a 15 foot wide culvert has been deemed appropriate to create proper drainage during a one hundred year flood event and allow access to the 3.5 miles of habitat, while providing road stabilization.

Analysis: The proposed project is located on the Wallowa-Whitman National Forest. The U.S. Forest Service (USFS) completed Endangered Species Act Section 7 Formal Consultation with both the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA). Additionally, National Historic Preservation Act Section 106 consultation was completed and a NEPA compliance document (Decision Memo) was written by the USFS. BPA's compliance checklist for this project was not necessary because the aforementioned documents, provided by the Forest Service, meet the standards and guidelines for the Watershed Management Program Environmental Impact Statement (EIS) and Record of Decision (ROD).

The only USFWS-listed species that could potentially be affected by the proposed culvert replacement project is bull trout. A USFWS Biological Opinion (BO) was written in December, 2005 that concurred with the USFS determination that the proposed project is likely to adversely affect bull trout. The adverse impacts to bull trout are anticipated to be short-term and the proposed action is not likely to jeopardize the continued existence of the Columbia River Basin distinct population segment (DPS) of bull trout. Critical habitat for bull trout has been designated on the Imnaha River below the Forest Service boundary, however, the BO concludes that the proposed action will not affect that area and no destruction or adverse modification of critical habitat is anticipated. Terms and Conditions (Conservation Measures) to minimize or avoid adverse effects to bull trout are outlined in Appendix 2 of the USFWS ESA Section 7 BO (see attached). BPA requires that all Conservation Measures must be adhered to.

The NOAA jurisdictional ESA-listed species that could potentially be affected by the proposed culvert replacement project are Snake River steelhead and Snake River spring/summer Chinook salmon. The Forest Service concluded that the proposed actions may affect, and are likely to adversely affect, Snake River steelhead and Chinook salmon and their designated critical habitat. The Forest Service also concluded that the project may adversely affect Chinook salmon Essential Fish Habitat. NOAA Fisheries wrote a BO in January, 2006 for the Mahogany Creek Culvert Replacement Project stating that the adverse effects of the project on critical habitat for steelhead and Chinook will be short-term and occur in a small area. The proposed project is not likely to jeopardize the continued existence of either Snake River steelhead or Snake River spring/summer Chinook salmon. NOAA Fisheries has outlined terms, conditions and Conservation Measures on pages 2-7 of the Mahogany Creek Project BO (see attached). BPA requires that terms, conditions and Conservation Measures must be adhered to.

A Programmatic Agreement for compliance with the National Historic Preservation Act of 1966 (as amended) was executed in March 1995 between Advisory Council on Historic Preservation, The Oregon State Historic Preservation Officer, and the Region 6 USDA Forest Service. A background file search at the Wallowa Mountains Office produced no cultural resource information on the Mahogany project site. The Mahogany Creek culvert project site was surveyed between August 6-18, 2003 by Jennifer McDaid (USFS). The survey entailed a pedestrian survey within the previously recorded site boundaries; areas parallel to the road/culvert; as well as both sides of the project culvert, with transects spaced 5-10 meters apart. During the survey, an Historic Structure/Lithic Scatter was found outside of the planned culvert activity area. Conditions outlined in the Programmatic Agreement state that all project work in the Mahogany Creek culvert project vicinity will be confined to the existing culvert. Contractors

must minimize the number of passes heavy machinery must make in the area. No waste material will be piled in this site. BPA requires that all terms and conditions, as outlined in the attached *Project Review for Heritage Resources* Programmatic Agreement, must be adhered to.

The U.S. Forest Service completed public involvement. Starting in spring 2003, a proposal was developed and included in the Wallowa-Whitman National Forest Schedule of Proposed Actions. Various culvert replacements that were to occur over a ten year period were proposed, Mahogany Creek culvert included. No written comments were received, though support for the proposal was/is widespread among agencies, local government, and other collaborative entities involved in the community planning process. No opposing comments have been received.

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

/s/ Kelly Mason

Kelly Mason

Environmental Specialist - KEC-4

CONCUR:

/s/ Kathy S. Pierce

Kathy S. Pierce

NEPA Compliance Officer - KEC-4

DATE: March 23, 2006

Attachments:

USFWS Mahogany Creek Culvert Replacement Project BO, December 2005

NOAA Fisheries Mahogany Creek Culvert Replacement Project BO, January 2006

Project Review for Heritage Resources PA between ACHP, SHPO and USFS R6, November 2003

USDA Forest Service, Wallowa-Whitman National Forest Decision Memo (CX)