June 21, 2001

RECEIVED
PUBLIC INV.
LOG#: KLIP-001
RECEIPT DA
JUN 28 2001

To whom it may concern -

I have received your letter dated June 13, 2001 concerning the draft environmental impact statement; fish and wildlife implementation plan and am reviewing the EIS. I must say that it is very apparent that we collectively must implement to recover an anadromous fish population while maintaining solid economic factors. 1

Meetings, hearings, biological opinions, BPA opinions and so forth are all that has been done. The information is in gentlemen.. and we must act on it. The Columbia River watershed once produced more anadromous fish than any other and it is time we take some action. These anadromous fish need a moving, free-flowing river to thrive and survive. 2

Please remove the earthen portion of the four lower Snake River Dams to allow more natural passage for these fish. Just alone with a solid return of salmon and steelhead annually we will create more jobs and boost economies of once slow areas. It will work and can work so lets stop all the meetings, opinions, EIS etc and place into action what will really work. We are smart enough, wealthy enough and have the foresight to 3 4

do the right decision. Lets not let greed and/or politics sway our decisions to do what is right for future generations.

Thank you for reading the letter and please send me a paper copy of the Draft EIS for my further review to the following address. Thanks.

John + Megan Kendall
1407 East 20th
Spokane, WA. 99203

USDA United States Department of Agriculture

Natural Resources Conservation Service

101 SW Main Street, Suite 1300
Portland, Oregon 97204-3221
(503) 414-3200
Fax: (503) 414-3103

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FW-IP-002
RECEIPT DATE:
JUL 10 2001

June 29, 2001

Charles C. Alton, Environmental Project Manager
Bonneville Power Administration, Room 122
Eastside Federal Complex
P.O. Box 3621
Portland, Oregon 97208

Dear Mr. Alton,

SUBJECT: NRCS Comments on the May 2001 Draft Fish and Wildlife Implementation Plan EIS

NRCS appreciates the opportunity to review this draft document. NRCS and our conservation partners are interested since we will undoubtly be involved with implementation actions dealing with habitat restoration efforts on private lands.

It is obvious that the intent of the EIS is to encourage positive support for habitat restoration from private landowners. Unfortunately, the following inconsistencies and lack of complete explanation will negatively affect private landowners and their willingness to participate. 1

The document does not adequately describe what actions are contained in the implementation plan, itself. The concept of an implementation plan implies decisions have been reached by BPA as to what actions to pursue to restore fish and wildlife. The only section of the draft EIS with any detail on implementation refers to "sample implementation actions" (see Chapter 3, section 3A). The use of the word "sample" does not connotate actions or decisions on what's to occur. In addition most of the actions listed read as goals and objectives not actions that describe what, when, where, who and how different tasks will be undertaken. Without this level of information it is difficult if not impossible to describe the cumulative environmental, economic and social effects required by NEPA. Effects do not site study or research references. They do not appear to be based on science nor on a process to synthesize societal values about the proposed alternatives. The concept of "Build Your Alternative" (see Volume 2, Appendix I) is interesting but perhaps should have been used through a public process to scope the alternatives prior to developing an implementation plan and this draft EIS. 2 3 4

The Commerce Focus Alternative has, what NRCS perceives as, major inconsistencies.

The draft EIS defines the Commerce Focus as: "a libertarian approach to conservation, in that it decreases government regulation and instead emphasizes voluntary actions, financial incentives and market mechanisms to bring about desired results. Private companies and citizens are given the flexibility to determine how they can best meet the goals of conservation, while still fulfilling their economic need." On pages xxiv-xxv of the draft EIS summary the effects of the Commerce Focus are displayed as less effective than the No Action alternative.

NRCS and our conservation partners view this as the only viable approach. A locally led, voluntary approach is the only way to get the needed private landowner trust and stewardship needed to restore fish and wildlife to sustainable levels. The effects of this alternative however, are displayed in the draft EIS as less effective than the "Status Quo (No Action) alternative." 5

Empowering local citizens to find solutions will provide effective, long lasting solutions that are impossible to achieve through a top down command and control approach. Building local support and ownership for conservation changes attitudes and stewardship that will last for generations. Regulations and enforcement at best control behaviors but only as long as the regulators are visible.

Long-term approaches that emphasize maximizing economic, social and cultural values and internalizing both private and public costs will result in similar outcomes as the draft EIS alternative described as "Sustainable Use." The use of financial incentives and processes that empower local decisionmaking can effectively be used to accelerate efforts to meet both economic and environmental objectives. 6

At least for Habitat Actions, NRCS disagrees that the implementation actions listed for the Commerce Focus Alternative (end of Chapter 3) would result in the effects displayed in chapter 5 (pages 226-266). 7

Thanks again for providing NRCS the opportunity to comment.

C. R. Vigil Jr. for
BOB GRAHAM
State Conservationist

cc:
Lorri Bodi, Bonneville Power Administration, P.O. Box 3621, Portland, Oregon 97208-3621

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-003
RECEIPT DATE:
JUL 11 2001

-----Original Message-----
From: Shelley Hartmann [mailto:county_planner@yahoo.com]
Sent: Monday, July 09, 2001 1:33 PM
To: ccalton@bpa.gov
Subject: EIS No. 010222, Fish and Wildlife Mitigation and Recovery

EIS No. 010222, Fish and Wildlife Mitigation and Recovery

Dear Mr. Alton

I am requesting that I be provided a copy of the EIS No. 010222, Draft EIS, DOE, Fish and Wildlife Implementation Plan, To Implement and Fund a Policy Directions for Fish and Wildlife Mitigation and Recovery, Pacific Northwest, AZ, CA, ID, MT, NV, NM, OR, UT, WY and British Columbia.

Also, I request on the behalf of the Lincoln County Commission, the Lincoln County Planning Commission and the Lincoln County Public Land Planning Commission, a 60-90 day extension to the comment period. 1 The August 6, 2001 suspense does not give sufficient time to receive the document, review it, and provide comments. It also violates our land use plans for adequate notice, and consultation, cooperation an coordination. 2

Sincerely

Shelley Hartmann, Coordinator
Lincoln County Planning Office
P O Box 307
Pioche, NV 89043

Shelley Wadsworth Hartmann
Planning Coordinator
Lincoln County Planning & Building Department
P.O. Box 307
Pioche, Nevada 89043
ph: 1-775-962-5165 fax: 1-775-962-5164

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-004
RECEIPT DATE: JUL 11 2001

-----Original Message-----
From: brucehenion [mailto:brucehenion@proaxis.com]
Sent: Monday, July 09, 2001 2:36 PM
To: ccalton@bpa.gov
Subject: EIS No. 010222, Fish and Wildlife Mitigation and Recovery

US DOE Charles Alton ccalton@bpa.gov

EIS No. 010222, Fish and Wildlife Mitigation and Recovery
Dear Mr. Alton

Request I be provided a copy of the EIS No. 010222, Draft EIS, DOE, Fish and Wildlife Implementation Plan, To Implement and Fund a Policy Directions for Fish and Wildlife Mitigation and Recovery, Pacific Northwest, AZ, CA, ID, MT, NV, NM, OR, UT, WY and British Columbia.

Also, request a 60-90 day extension to the comment period. The August 6, 2001 suspense does not give sufficient time to receive the document, review it, and provide comments. 1

Bruce Wayne Henion
3339 Jefferson Scio Drive S. E., Jefferson, Oregon 97352
http://www.energyquestsearch.com

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-005
RECEIPT DATE:
JUL 11 2001

-----Original Message-----
From: Katherine Van Tuyl [mailto:katielu@surfree.com]
Sent: Sunday, July 08, 2001 10:32 AM
To: ccalton@bpa.gov
Subject: EIS No. 010222, Fish and Wildlife Mitigation and Recovery

US DOE Charles Alton ccalton@bpa.gov

EIS No. 010222, Fish and Wildlife Mitigation and Recovery

Dear Mr. Alton

Request I be provided a copy of the EIS No. 010222, Draft EIS, DOE, Fish and Wildlife Implementation Plan, To Implement and Fund a Policy Directions for Fish and Wildlife Mitigation and Recovery, Pacific Northwest, AZ, CA, ID, MT, NV, NM, OR, UT, WY and British Columbia. Why is the state of Washington not included?

Also, request a 60-90 day extension to the comment period. The August 6, 2001 suspense does not give sufficient time to receive the document, review it, and provide comments. 1

Sincerely

Katherine Van Tuyl
4764 Andrews Road
Medford, OR 97501

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-006
RECEIPT DATE:
JUL 11 2001

-----Original Message-----
From: watermanranch@webtv.net [mailto:watermanranch@webtv.net]
Sent: Sunday, July 08, 2001 11:19 AM
To: ccalton@bpa.gov
Subject: EIS No 010222 Draft

Mr. Alton:

Please send me a copy of the EIS No.010222 Draft EIS, DOE, Fish and Wildlife Implementation Plan to Implement and fund a policy direction for fish and wildflife mitigation and recovery, Pacific Northwest, Az, CA, Id, Or.....etc.

Please extend the comment period another 60-90 days to allow those of us in these states to review the draft.] 1

Thank you very much.

incerely,

Sharon Waterman
87518 Davis Creek Lane
Bandon, Oregon 97411

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-007
RECEIPT DATE:
JUL 11 2001

-----Original Message-----
From: Rachel Thomas [mailto:badger@theriver.com]
Sent: Friday, July 06, 2001 3:05 PM
To: US DOE Charles Alton
Subject: EIS No. 010222, Fish and Wildlife Mitigation and Recovery

Dear Mr. Alton

Request I be provided a copy of the EIS No. 010222, Draft EIS, DOE, Fish and Wildlife Implementation Plan, To Implement and Fund a Policy Directions for Fish and Wildlife Mitigation and Recovery, Pacific Northwest, AZ, CA, ID, MT, NV, NM, OR, UT, WY and British Columbia.

Also, request a 60-90 day extension to the comment period. The August 6, 2001 suspense does not give sufficient time to receive the document, review it, and provide comments.] 1

Sincerely

Rachel Thomas
Box 4637
Huachuca City, AZ 85616

VED BY BPA
LIC INVOLVEMENT
#: FWTP-008
ECEIPT DATE:
JUL 11 2001

-----Original Message-----
From: Casey Jones [mailto:luego@c2i2.com]
Sent: Sunday, July 08, 2001 4:51 PM
To: ccalton@bpa.gov
Subject: EIS No. 010222, Fish and Wildlife Mitigation and Recovery

Mr. Alton

Please provide me a copy of the EIS No. 010222, Draft EIS, DOE, Fish and Wildlife Implementation Plan, To Implement and Fund a Policy Direction for Fish and Wildlife Mitigation and Recovery, Pacific Northwest, AZ, CA, ID, MT, NV, NM, OR, UT, WY and British Columbia.

Please extend the comment period for an additional 60 to 90 days.. The current August 6, 2001 suspense doesn't allow sufficient time to receive, review, and provide comments on a document of this import. 1

Sincerely

Casey Jones
1920 Lexington Drive
Sierra Vista, AZ 85635

:D BY BPA
LIC INVOLVEMENT
OG#: FWIP-009
RECEIPT DATE:
JUL 1 1 2001

-----Original Message-----
From: Della [mailto:dbcaz@theriver.com]
Sent: Saturday, July 07, 2001 7:27 PM
To: ccalton@bpa.gov
Subject: Fish and Wildlife Mitigation and Recovery

US DOE Charles Alton

EIS No. 010222, Fish and Wildlife Mitigation and Recovery.

Mr. Alton,

I request to be provided a copy of the EIS No. 010222, Draft EIS, DOE, Fish and Wildlife Implementation Plan, to Implement and fund a policy directions for fish and ?wildlife mitigation and recvoery, Pacific northwest, AZ, CA,ID,MT,NV,UT,WY and British Columbia???

Also, I request at least a 90 day extension to the comment period. Less than a month is hardly sufficient time to receive the document, review it and provide comments. 1

Sincerly

D E Callison
HC1 Box 430
Elgin, AZ 85611

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-010
RECEIPT DATE:
JUL 18 2001

-----Original Message-----
From: Susan Krentz [mailto:crazycow66@hotmail.com]
Sent: Saturday, July 07, 2001 10:32 PM
To: ccalton@bpa.gov
Subject: REQUEST INFORMATION AND DELAY.

US DOE Charles Alton ccalton@bpa.gov

EIS No. 010222, Fish and Wildlife Mitigation and Recovery

Dear Mr. Alton

Request I be provided a copy of the EIS No. 010222, Draft EIS, DOE, Fish and Wildlife Implementation Plan, To Implement and Fund a Policy Directions for Fish and Wildlife Mitigation and Recovery, Pacific Northwest, AZ, CA, ID, MT, NV, NM, OR, UT, WY and British Columbia.

Also, request a 60-90 day extension to the comment period. The August 6, 2001 suspense does not give sufficient time to receive the document, review it, and provide comments. 1

Sincerely,

Susna Krentz

Box 3592

Douglas. Az. 85608-3592

Get your FREE download of MSN Explorer at http://explorer.msn.com

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-011
RECEIPT DATE:
JUL 18 2001

Look at dams, not pinnipeds

The June 27 article, "Competing with pinnipeds," speculates on the effect seals and sea lions are having on wild salmon populations. It misguides your readers as to the primary factors that have led to the endangerment of wild Pacific salmon.

We need not look further than the breaching of the four lower Snake River dams.

The economic benefits from recreational and sports fishing would replace the hundreds of millions of dollars spent on taxpayer subsidies for dam-dependent industries. Federal programs such as the barging of smolt have proved ineffective, as only 0.25 percent return to the Snake River. The adult to smolt return range of 2 percent to 6 percent is needed for salmon recovery.

The more education the public receives on the economic, environmental and cultural gains from breaching these dams, the more obvious the need for their removal.

PAUL ST. GERMAINE
Northeast Portland
pst_g@yahoo.com

Greed, destruction continue

Bonneville Power Administration gets a 46 percent rate increase and our tragically depleted salmon runs get no relief (June 30 article). Is our greed for power so great that we continue the exploitation of our earth? Where is conservation and stewardship?

What is the future for our grandchildren? My 12-year-old and I just visited the hatchery at Bonneville Dam and reread the horrible history of our destruction of the Columbia River. And so we continue. How sad.

RON ENNIS
Northeast Portland

Ratepayers and salmon lose

How is it that an agency that serves the public at large has so little regard for our collective future?

The Bonneville Power Administration's decision to not spill water for salmon migration is a slap in the face to our children. We are expected to absorb a 46 percent rate increase as well as the destruction of our future?

If three levels of government scientists were to determine that a new drug was hazardous to people's long-term health, would we then allow the pharmaceutical companies to ignore those findings and sell it anyway?

The BPA is now Rhett Butler: "Frankly, my salmon, we don't give a (dam)." Well, frankly, I'm disgusted.

WILL STRICKLAND
Southeast Portland

BPA ignores worth of salmon

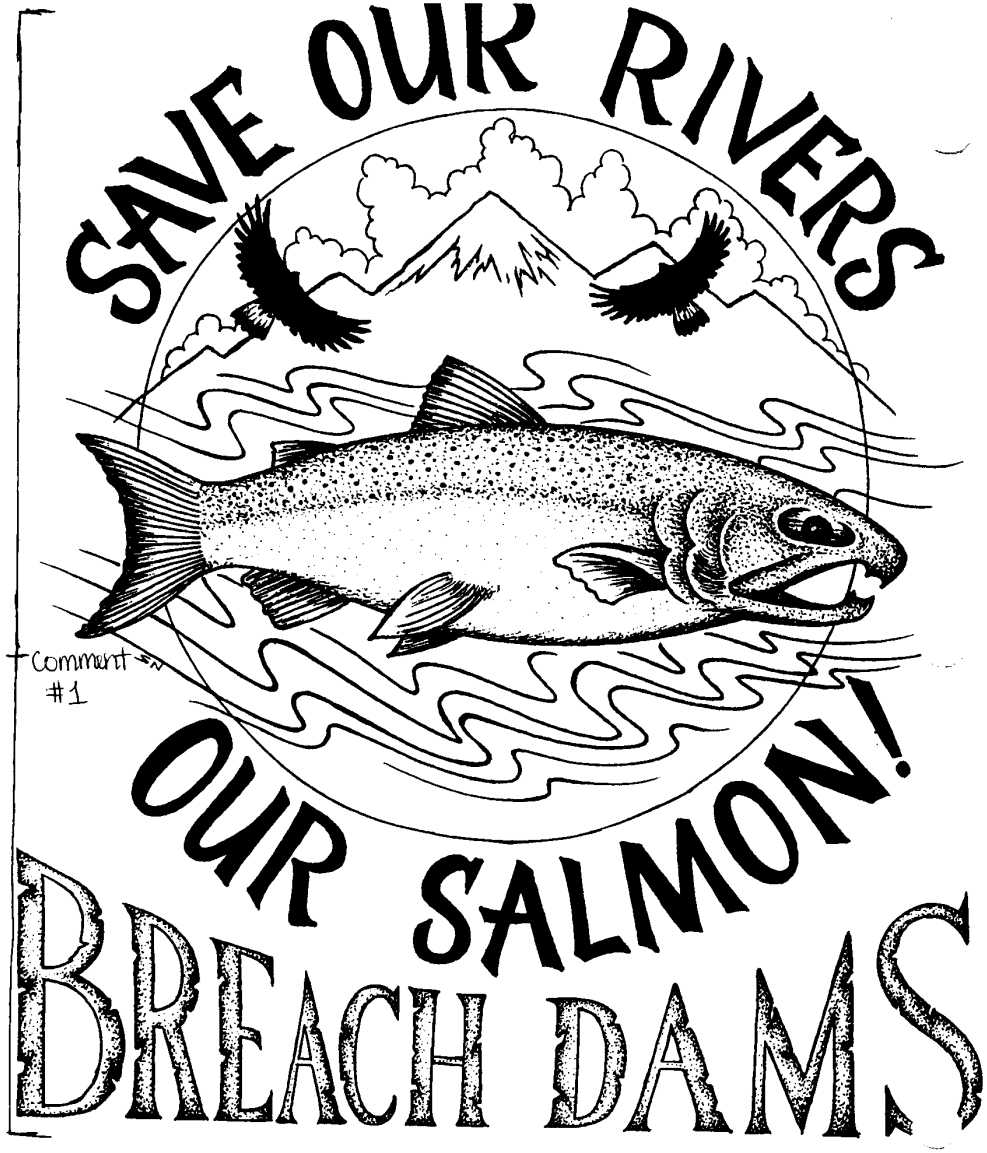
The Bonneville Power Administration seems to believe that communities, cultures and individuals that care about and depend on salmon can be ignored, and salmon restoration plans can be put on hold.

Furthermore, BPA seems to want to balance the books on the backs of fish while fishermen are looking for new jobs. Yet the BPA is patting itself on the back for a job well done, while increasing rates 46 percent.

Worst of all, the agency is not spilling a drop of water for salmon.

Where is the balanced approach? It's about the salmon, stupid. I can adapt by lessening my demand on electricity. I'm not stupid.

K. MICHAEL CLARK
Corvallis



Comment #1

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

RECEIVED BY BPA
PUBLIC INVOLVEMENT
FWTP-012
RECEIPT DATE:
AUG 0 2 2001

IN REPLY REFER TO:

July 31, 2001

ER 01/586

Charles Alton, Project Manager - KEC-4
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208

Dear Mr. Alton:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Bonneville Power Administration Fish and Wildlife Implementation Plan in the Pacific Northwest and offers the following specific comments for use in the Final Environmental Impact Statement (FEIS).

GENERAL COMMENTS

The Department through the National Park Service (NPS) manages a portion of Lake Roosevelt formed by the Grand Coulee Dam and the associated lands at Lake Roosevelt National Recreation Area (LRNRA), a unit of the National Park System. The LRNRA is included in the project area of the draft EIS. The portion of Lake Roosevelt managed by the NPS includes about 312 miles of shoreline, 47,438 acres of water surface (at full pool) and 12,936 acres of land. The other portions of Lake Roosevelt are managed by the Colville Confederated Tribes and the Spokane Tribe.

Recreation Use and Facilities

We are concerned that the following information in the Recreation Use and Facilities was not considered in the draft EIS. The FEIS should include the following information on impacts to recreation use and facilities for the lands managed through the NPS and should be considered in the final analyses for mitigation to these resources:

> Visitation at the LRNRA has been between 1.3 and 1.5 million recreation visits for the last several years. The lake is a popular recreation destination in the summer months because of its size, the quality of its water, the beauty of the surrounding scenery, and the fact that it is one of the few large lakes in the region that has an extensive amount of shoreline and adjacent lands that are publicly owned and available for public use. #1

The developed facilities that the NPS manages for the public include: 22 boat launch ramps with adjacent trailer and vehicle parking lots, 28 campgrounds (18 drive-in and 10 boat-in) containing 640 individual sites as well as several group campsites, 10 developed swim areas, and three concessionaire-operated marinas. In addition, swimming and beach camping is allowed on the shoreline throughout the entire recreation area. #1

The Department is concerned that changes in reservoir operations that directly affect the management of the National Recreation Area, in terms of public access and resource management and protection, have not been adequately addressed in the DEIS. According to the December 2000 Biological Opinion on the Federal Columbia River Power System, Lake Roosevelt will be drafted as low as elevation 1,280 feet by August 31, during average and above-average water conditions and to elevation 1278 feet in years of lower flows (less than 92 Maf). It is our understanding that based on historical flows, the occurrence of flows less than 92 Maf could be more than 50 percent of the time. The following information should be included in the FEIS for analysis:

The July-August period is the busiest period on the lake for recreation. This period receives 45 percent of the total recreation use. In 2000, visitation for July was 317,529 visits and for August was 408,433 visits.

Five boat ramps are affected by lake elevations between 1282 feet and 1278 feet (minimum boat launch elevation is listed):
Jones Bay – 1282 feet
Marcus Island – 1281 feet
Evans – 1280 feet
Napoleon Bridge – 1280 feet
North Gorge – 1280 feet

Four of these are located north of Kettle Falls including Evans which is a major access point for the north end of the lake. Below elevation 1,280 feet, access to the lake above Kettle Falls is significantly limited. #2

All courtesy docks that are attached to the shoreline would be high and dry below elevation 1,280 feet.

Most floats around designated swimming areas go dry by elevation 1,280 feet. This would be a major impact on day-use.

The water well serving the Marcus Island campground would go dry at elevation 1,280 feet.

Visitor safety and accessibility would be affected due to steeper slopes to access facilities during period of the heaviest visitation. Boaters would also face unfamiliar navigation hazards at lower than normal summer time lake levels.

We also request that your agency provide information in the FEIS on how you will mitigate for these impacts to recreation use and facilities. For your information, we have included our estimate on costs to mitigate the above impacts as follows: #3

Retrofit docks	$360,000
Retrofit launch ramps (extend, widen)	73,000
Retrofit swim areas	70,000
Deepen Marcus Island well	18,000
Cultural compliance	30,000
Total:	$551,000

There would also be an estimated increase of $36,000 in annual operating costs (moving docks, cleaning sand off ramps, patrolling exposed cultural sites, etc.) associated with the summer drawdown.

Concessionaire Operated Marinas

The Department is also concerned that the three concessionaire operated marinas within the LRNRA that would be affected by changes in the summer operations of Lake Roosevelt were not addressed in the DEIS. Please include this information and the analyses for affects on these concessionaires in the FEIS:

Roosevelt Recreational Enterprises, a Colville Tribal enterprise, operates marinas under concession contract with the NPS at Keller Ferry and Seven Bays. The marina at Kettle Falls is operated under a concession contract by Lake Roosevelt Vacations, Inc. #4

Primary impacts of additional summer drawdown would include the loss of docks used for seasonal and short-term moorage. Elevation 1,278 feet puts the Kettle Falls marina on the "bubble" in terms of having to relocate 60 rental slips, a houseboat operation and fuel dock to the main channel of the lake causing congestion at the public launch ramp. Changes in the summer operations of Lake Roosevelt could significantly impact all three marinas during their primary revenue-generating season.

Cultural Resources

We are very concerned that the impacts to cultural resources in the LRNRA, given the drafting of Lake Roosevelt below elevation 1,280 feet, was not adequately addressed in the DEIS. Drafting of Lake Roosevelt below elevation 1,280 feet would expose cultural resource sites which normally have been protected by inundation from the adverse effects of the peak visitation period. The following information should be included in the FEIS and used for the impacts analyses of this project on cultural resources: #5

Within the LRNRA, there are 22 cultural resource sites and portions of an additional 18 sites that would be subjected to increased artifact collection and looting. The exposed

sites would also suffer disturbances from the many visitors engaged in such seemingly innocent beach activities as digging sandcastles, building temporary structures, or even skipping stones. During the peak visitation period, these activities have traditionally been confined from the 1,280 to1,290-foot zone where the surface sediments have been disturbed by wave and wind action. By lowering the pool below 1,280 feet during the summer, the surf zone will be lowered creating a new zone of disturbance in these sites. #5

Resident Fish Habitat and Recreational Fisheries

Considerable investment has been made over the years by Bonneville Power Administration and other agencies to develop a resident fishery in Lake Roosevelt to compensate, in part, for the loss of the native fishery above Grand Coulee Dam. This has resulted in a significant year-round recreational fishery. We are concerned that the impacts to this resource of fluctuations below elevation 1,280 feet (July to August) were not addressed in the DEIS. The following impacts would be two-fold, and should be included and analyzed in the FEIS:

First, is the impact to productivity of Lake Roosevelt. Tribal fishery biologists in this area have found that 60 percent of the shallow embayments, the primary zooplankton production areas, occur between elevations 1,290 feet and 1,270 feet. These protected shallow areas are critical to the production of zooplankton that are utilized by fish in the Lake Roosevelt fishery. It is estimated that it takes over 100 days for zooplankton growth to reach a size that can be utilized by fish. With Lake Roosevelt's retention time being below 80 days in the open water pelagic zone, zooplankton does not have enough time to mature before it is entrained out of the reservoir. These embayments have a much longer retention time than the open-water habitat, which allows the zooplankton growth to reach a level that is suitable for fish consumption. #6

A second major impact of lowering the reservoir in the late summer would be the loss of macrophyte (aquatic plant) populations and near shore fine sediment layers that have developed. The fine sediment layers that are laid down near shore in a stable lake environment become a place for macrophyte growth. This macrophyte growth is critical as cover habitat for fish fry. Also, the fine sediment layer creates turbid conditions that the fry can use to hide from predators. A drop in lake elevation in late summer does two things that reduce this cover layer. It de-waters much of the macrophyte growth and causes it to desiccate. Also the fine sediment zone that developed near the shore is now temporarily gone. The results of this action make the fry fish vulnerable to predation due to the loss of cover habitat.

Public's Exposure to Toxic Materials

The DEIS did not address the exposure to the public during the peak public utilization period, of additional portions of the lake bed, which may have deposition areas containing toxic materials. These toxic materials have been the result of past and present activities of a lead/zinc smelter and pulp mill upstream, and from other mining, logging, agricultural, industrial and municipal #7

activities. The affect to the public and possible mitigation given the drawdown of the lake should be included in the FEIS. #7

Thank you for the opportunity to comment. If you have any questions regarding these comments, please contact Vaughn Baker, Superintendent, Lake Roosevelt National Recreation Area at (509) 633-9441.

Sincerely,

Preston A. Sleeger
Regional Environmental Officer

Kuehn, Ginny -KC-7

From: Richard.A.Carosone@am.pnu.com
Sent: Friday, August 03, 2001 5:08 AM
To: comment@bpa.gov
Subject: Fish and Wildlife Implementation Plan

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-013
RECEIPT DATE:
AUG 0 3 2001

Dear BPA,

I tried to record my comments at the phone number you listed in your letter, 800-622-4519. I was told by the person that answered that they did not have the capability to record my comments. So I will be more brief because my typing skills leave a lot to be desired.

The only two options that can be considered for KEC-4, is the Natural Focus alternative or the Weak Stock Alternative. I think that there should be some modifications to both of these options also. I am not an engineer or a wildlife biologist but I do know that the only thing that will restore our fish runs is the breaching of the lower four Snake River dams. Granted this may still not restore them to historical levels but it is our best chance. Right now we are wasting millions of dollars on fish restoration that is providing minimal help. I realize the consequences of breaching are the loss of barging jobs and power generation. The addition of longer fishing seasons will more than offset this loss. This was evidenced by the mass migration of people to fish for Chinook salmon this year in Idaho. #1 #2

You have put off fish recovery long enough it is time to make the long term commitment to fish recovery and breach the four lower Snake River dams. The fish have been and are now being "slowed played" into extinction. Future generations deserve to have the opportunity to see these great fish and it will only happen through dam breaching.

Rick Carosone

We are Citizens, + payers. Voters.!

S. Nighthawk
1801 SW Goodwin Av
Pendleton, OR
97801

Outraged by salmon sacrifice

I am outraged that the Bonneville Power Administration claims it has no option but to eliminate salmon protections in this year of record low rainfall ("Water shortage may force BPA to end fish aid," March 8). Are we really to believe that we must sacrifice one of the Northwest's natural treasures so that the region can continue to have cheap power?

Administrator Steve Wright has put forth an unacceptable plan that ignores [illegible]cently adopted federal salmon re[illegible] plan and devotes all available [illegible] in the dam to power production.

Wright's plan would allow no water to be saved for the spring salmon run and would eliminate spillovers that divert water from turbines. Why do we place an already endangered species in such peril?

Wright claims that the other option, buying out-of-state power, is too costly, and would put BPA in the red. We must resist this attempt to shift the burden of California's energy crisis to our natural heritage. The long-term health of our salmon is more important than the short-term fiscal problems of a bloated and struggling energy industry.

WILLIE SMITH-CARLILE
Southeast Portland

C.C. Tribal, State, Federal agencies

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-014
RECEIPT DATE:
AUG 0 6 2001

Look at dams, not pinnipeds

The June 27 article, "Competing with pinnipeds," speculates on the effect seals and sea lions are having on wild salmon populations. It misguides your readers as to the primary factors that have led to the endangerment of wild Pacific salmon.

We need not look further than the breaching of the four lower Snake River dams.

The economic benefits from recreational and sports fishing would replace the hundreds of millions of dollars spent on taxpayer subsidies for dam-dependent industries. Federal programs such as the barging of smolt have proved ineffective, as only 0.25 percent return to the Snake River. The adult to smolt return range of 2 percent to 6 percent is needed for salmon recovery.

The more education the public receives on the economic, environmental and cultural gains from breaching these dams, the more obvious the need for their removal.

PAUL ST. GERMAINE
Northeast Portland
pst_g@yahoo.com

Navigation top calling for dams

Your editorial "A year of sorries" (July 8) presented a sham argument against removal of the four lower Snake River dams.

In a story by Gail Kinsey Hill published the same day, The Oregonian reported that 3,700 megawatts of new generation will be on line by January 2003. This will more than offset any deficit created by removing the dams.

Arguing that these dams are a crucial component of power generation in the region is just plain disingenuous. The purpose of these dams is to create slack water for navigation; power generation is secondary. They contribute less than 5 percent to the region's electricity production.

Even with this meager contribution included in the equation, removal of the dams and restoration of salmon runs would result in a net economic benefit for the region. We can prosper without these dams, but we cannot afford extinction of wild salmon runs.

JAY D. FORMICK
Canby

Greed, destruction continue

Bonneville Power Administration gets a 46 percent rate increase and our tragically depleted salmon runs get no relief (June 30 article). Is our greed for power so great that we continue the exploitation of our earth? Where is conservation and stewardship?

What is the future for our grandchildren? My 12-year-old and I just visited the hatchery at Bonneville Dam and reread the horrible history of our destruction of the Columbia River. And so we continue. How sad.

RON ENNIS
Northeast Portland

Ratepayers and salmon lose

How is it that an agency that serves the public at large has so little regard for our collective future?

The Bonneville Power Administration's decision to not spill water for salmon migration is a slap in the face to our children. We are expected to absorb a 46 percent rate increase as well as the destruction of our future?

If three levels of government scientists were to determine that a new drug was hazardous to people's long-term health, would we then allow the pharmaceutical companies to ignore those findings and sell it anyway?

The BPA is now Rhett Butler: "Frankly, my salmon, we don't give a (dam)." Well, frankly, I'm disgusted.

WILL STRICKLAND
Southeast Portland

BPA ignores worth of salmon

The Bonneville Power Administration seems to believe that communities, cultures and individuals that care about and depend on salmon can be ignored, and salmon restoration plans can be put on hold.

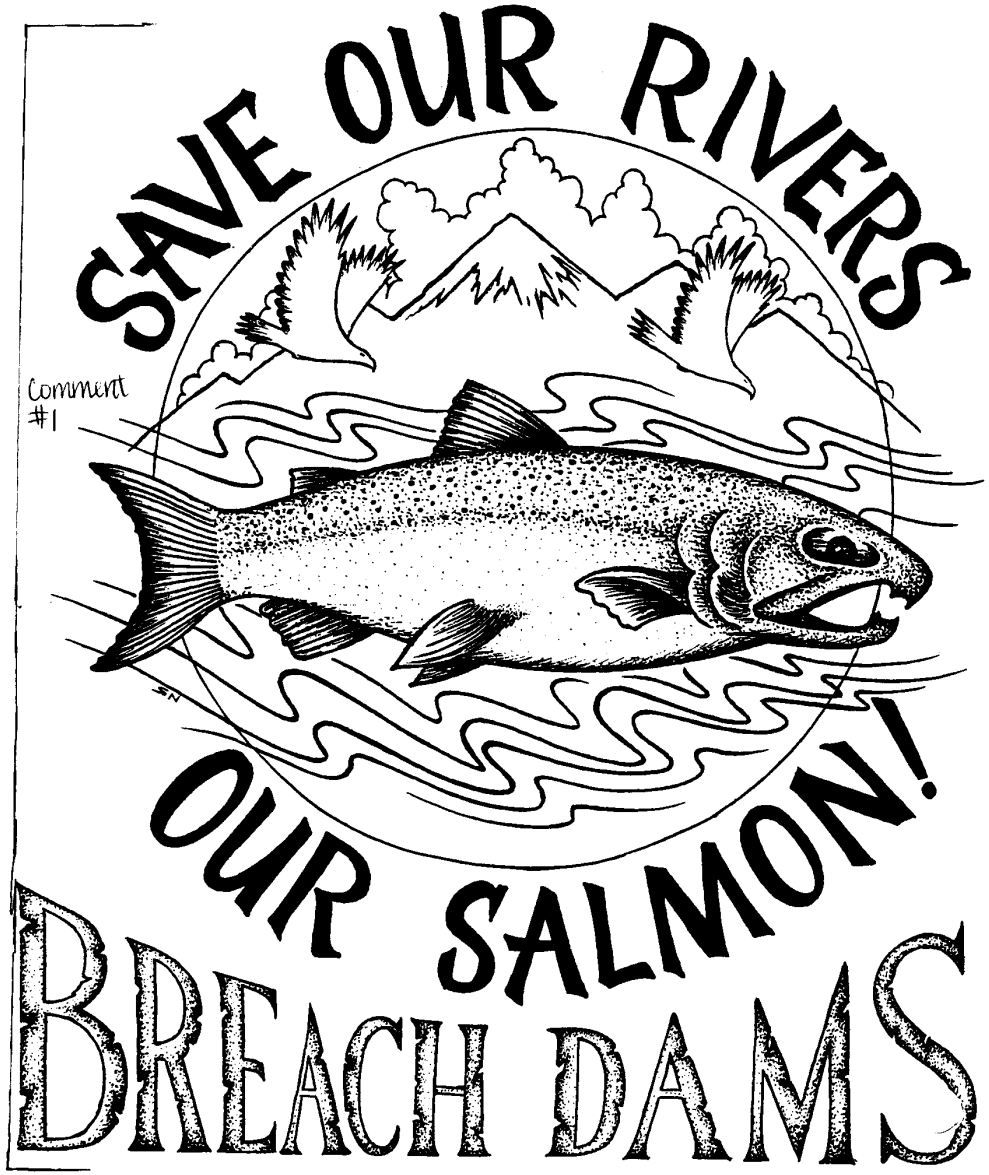
Furthermore, BPA seems to want to balance the books on the backs of fish while fishermen are looking for new jobs. Yet the BPA is patting itself on the back for a job well done, while increasing rates 46 percent.

Worst of all, the agency is not spilling a drop of water for salmon.

Where is the balanced approach? It's about the salmon, stupid. I can adapt by lessening my demand on electricity. I'm not stupid.

K. MICHAEL CLARK
Corvallis

Comment #1



Fish and Wildlife Implementation Plan

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-015
RECEIPT DATE:
AUG 06 2001

Telephone comment by Ginny Kuehn
8/6/2001

Joe Thompson
229 Kootenai Creek Road
Stevensville, MT 59870
(406) 543-3785

1. My concern is first of all that the draft EIS is willing to spend grandiose while nothing is being done to save salmon when in essence we are maintaining the status quo.

2. Study and research are used extensively in the paper, yet we know what it takes to restore the runs.

3. Nothing in the paper convinces me that we can save the salmon without breaching dams (Snake River Dams).

4. Time is of the essence. We don't have time for study and research. These species face extension.

#1

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-016
RECEIPT DATE:
AUG 09 2001

Paula A. Jones
223 S. Lincoln Ave.
Pocatello, ID 83204

Bonneville Power Administration,

Quoting from The Fish and Wildlife Implementation Plan Draft EIS (DEIS) "Despite the efforts of the BPA and other regional entities in the Pacific Northwest, some species of fish and wildlife continue to decline." With over 3 billion dollars spent on failed recovery measures I think it is time for BPA to set some new, more effective policies. I want to see the new direction of policy for the BPA to be based on the Weak Stock Focus. I want to see the weakest fish populations saved first. Emphasis should be placed upon breaching the four Lower Snake dams allowing a natural current to carry salmon smolts to the Pacific Ocean. The 4 or 5% of generation capacity these dams provide could easily be made up with conservation measures or through alternative energy sources. As recent as 7-29-01 Idaho Power placed an ad in the Idaho State Journal stating that there had been a 9% drop in power consumption after adjusting for weather and also including 8,171 new residential accounts. The Stateline 300 megawatt Wind Power project is a good start. It not only is supplying environmentally benign power it is also generating jobs and good source of commerce. Instead of wasting another 3 billion dollars, invest it on something that will truly help our region. The four lower Snake dams are in violation of the Clean Water Act. Extinction is not an option, apply and follow the Weak Stock Policy.

#1 #2 #3 #4

Sincerely yours,

Paula A. Jones

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-017
RECEIPT DATE:
AUG 09 2001

Marshall Magee
246 Skyline Drive
Pocatello, ID 83204

Bonneville Power Administration,

Quoting from The Fish and Wildlife Implementation Plan Draft EIS (DEIS) "Despite the efforts of the BPA and other regional entities in the Pacific Northwest, some species of fish and wildlife continue to decline." I want to see the new direction of policy for the BPA to be based on the Weak Stock Focus. I want to see the weakest fish populations saved first. Emphasis should be placed upon breaching the four Lower Snake dams allowing a natural current to carry salmon smolts to the Pacific Ocean. The 4 or 5% of generation capacity these dams provide could easily be made up with conservation measures. As recent as 7-29-01 Idaho Power placed an ad in the Idaho State Journal stating that there had been a 9% drop in power consumption after adjusting for weather and also including 8,171 new residential accounts. The four lower Snake dams are in violation of the Clean Water Act. Over 3 billion dollars has been spent on failed recovery measures. Extinction is not an option, apply and follow the Weak Stock Policy.

#1 #2 #3

Sincerely yours,

Marshall Magee

PNGC Power
Smart. Local. Connected.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-018
RECEIVED:
AUG 23 2001

August 22, 2001

Communications
Bonneville Power Administration
KC-7, P.O. Box 12999
Portland, OR 97212

Re: Comments on Fish and Wildlife Implementation Plan Draft Environmental Impact Statement (DOE/EIS-0312)

These comments on the Fish and Wildlife Implementation Plan Draft Environmental Impact Statement ("Draft EIS") are offered on behalf of PNGC Power, an energy services cooperative owned by 15 rural electric cooperatives in the Pacific Northwest. In addition to being customers of the Bonneville Power Administration (BPA), these distribution cooperatives are located primarily in rural areas of the Northwest, and have a significant interest in promoting effective fish and wildlife conservation efforts.

We understand that BPA is interested in receiving comments regarding whether the correct range of options and impacts are discussed in the Draft EIS, and whether there is a policy direction or hybrid we would propose from the list provided within that document.

General Comments on the Draft EIS

BPA has taken an ambitious step in trying to accomplish the impossible. This Draft EIS attempts to do what the region has been unsuccessful in trying to do for years: make sense of the layers of regional processes ongoing in the name of Columbia river basin fish and wildlife mitigation. While the document inevitably falls short of that lofty goal, it provides a useful summary of the current status of these issues.

The section of the document on the history of these issues provides interesting context. However, we do not see this section as entirely necessary. There is a danger in attempting to quickly summarize the history of an entire region. History is written, consciously or not, through the filter of those doing the writing. The history of natural resources in our region suffers from incomplete data and inconsistent measurement over time. We find that this summary suffers from those same ailments in addition to suffering from an overemphasis of certain themes. It is not necessary in an EIS. #1

A more useful endeavor would be for BPA to take this opportunity to outline the reasons for the lack of policy coordination from which the region suffers. A good effort has been made in this Draft EIS to collect the various laws, agencies, and processes impacting these issues. Why not take the next step to recognize and propose action on the management conflicts occurring between these laws, and between BPA and other federal, state, and tribal entities involved in fish and wildlife management? #2

Pacific Northwest Generating Cooperative
711 NE Halsey, Suite 200 • Portland, OR 97232-1268
(503) 288-1234 • Fax (288) 2334 • www.pngc.com

In general, the Draft EIS makes a worthy attempt at achieving part of what it sets out to do--describe a broad range of fish and wildlife alternatives under consideration in the region for purposes of complying with the National Environmental Policy Act. **However, there is a serious question about the usefulness of the sections of the document that attempt to select a preferred course of action.** This is the danger in trying to create a "forward looking policy-level EIS" in a policy vacuum. This danger is discussed further in the following sections. #2

BPA Overreaches on the Scope of the Draft EIS

It appears that this EIS has gotten ahead of itself. Unlike preparing an EIS within a more limited geographic boundary and more limited set of issues, preparing an accurate policy EIS where there is no real coordinated policy is an unreachable goal. BPA is trying to fit a round peg into a square hole. The entire array of Columbia Basin fish and wildlife activity is not within the province of BPA's actions, therefore does not lend itself to creation of an EIS for NEPA purposes by BPA. Attempting to create such a policy may only further the attitude that BPA should try to be all things to all people. #3

This document includes thousands of possible actions, and it groups them into several sets of themes. But, there is no way of knowing which of these actions will actually be proposed, or which combination of these actions will be proposed over the long time frame the EIS anticipates. So, the answer to the first question posed by BPA: "Do we have all of the basic environmental effects for fish and wildlife?" No, you do not.

No one in the region has been able to determine all of the possible environmental effects possible for fish and wildlife. **But, this document does not even try to do so because it relies on previously existing lists of options that have their own limitations and biases.** For example, at one extreme, it lists breaching dams and the potential impacts. But, on the harvest side it only lists eliminating "most" harvest, not "all" harvest with potential impacts on weak stocks. There are many other inconsistencies; the faulty scientific assumptions underlying this list of impacts is discussed further below. #4

Similarly, it is disturbing that BPA decides to pursue NEPA coverage for actions that are not legal under current law, such as dam breaching. We raised this issue when we first discussed this EIS over a year ago. The explanation from BPA is that this document is supposedly going to serve the region for the next 20 years, so predicting what will be legal at that point is difficult. We do not find this argument persuasive. In judging the speed of the processes to date, BPA will have ample time to pursue NEPA coverage for any proposals (in the event they ever see the light of day in Congress, and assuming that BPA really is an agency in need of NEPA coverage with respect to such proposals that involve actions of the Army Corps of Engineers). **We do not believe that NEPA compels an EIS on actions that are neither legal nor realistic at this point.** #5

BPA's Policy Scheme is Misguided and Unworkable

BPA proposes six policy directions including Status Quo, Natural Focus, Weak Stock Focus, Sustainable Use Focus, Strong Stock Focus, and Commerce Focus. Then it poses the question:

"Do you have a Policy Direction or hybrid alternative you propose and what are its effects?" In answering this question, the reader is expected to plug preferences into a simplified decision-making model and determine the outcome.

Having advocated, at times side by side with BPA, for inserting some logic and accountability into the fish and wildlife efforts within the region, it pains us to have to ask the obvious question: aside from creating another layer of process in the region, what is BPA trying to accomplish in this Draft EIS? These policy directions have real impacts on real people; they should not be treated as if they were a computer game in which we can simply mix and match options. #6

Is the agency actually expecting to come up with a coordinated and unified policy direction to impose upon the region through this process? Or, if the policy is only for BPA's purposes, then how does BPA expect that the policy direction will be coordinated with the other myriad agencies within the Northwest? BPA seems to be of two minds on these questions. **On the one hand, BPA indicates that it does not intend to unilaterally select a policy direction (Draft Summary p. v, and Draft p. 15). On the other hand, BPA states its intention to identify a preferred alternative in the final EIS (Summary p. xv and Draft p. 16).** #7

If not for this last point, we would be inclined to dismiss the entire section on "Comparison of Alternatives" as a theoretical and academic exercise for testing regional popularity of policy choices. We appreciate BPA's desire to show leadership on these issues. But, the region has already been going through several processes testing the popularity of these choices and is plenty awash in process. The Draft EIS highlights the amount of process and overlapping agency involvement in several beautifully complex charts that speak volumes about the folly of pursuing any unilateral policy direction on this issue (Figures 1-1, 1-2, 1-3, 1-4, 3-2, 3-3, 4-2).

Moreover, it is not at all clear why BPA believes that it needs to cover the entire waterfront of salmon and steelhead recovery tools within this EIS when it is only one of many agencies involved with these issues. One wonders whether having most of the salmon recovery funding for the region imposed upon them (and upon the consumers) has created an unreasonable assumption that BPA must impose an ultimate policy direction regardless of the activity within the rest of the region. #8

Regardless, the real policy options coming out of other processes, especially the 2000 Biological Opinion for the Federal Columbia River Power System and the so-called "All-H Paper", do not and should not fit neatly into the categories offered in this Draft EIS. Of course, assuming that valid categories could be created, and that a valid policy direction could be created, the only reasonable approach would be to pursue a hybrid that recognizes the complexity of the issues at hand. But, those are large assumptions. #9

The problem is that this Draft EIS does not propose valid policy categories because it oversimplifies and mischaracterizes the categories throughout the document. Part of the problem seems to be a fundamental misunderstanding of the issue. For example, it describes a "Commerce Focus" as representing a "libertarian" approach to conservation. In support of this it cites a paper by Pacific Northwest Waterways Association entitled "Saving Salmon in the Pacific Northwest". As one of the entities that co-wrote and signed that paper, we are appalled by this #10

characterization. That paper argued for an "All-H" approach that recognizes the policy and legal conflicts the region faces and asks for some accountability for actual results. As those who have been paying $435 million per year in electricity rates (over $3 billion total) to support these fish and wildlife programs, we do not realistically aspire to elimination of that funding for the government effort. However, we would aspire to having some enhanced accountability relating to recovery effects from that investment. As the fiduciary of ratepayers dollars, we would hope that BPA shares our interest in efficient recovery efforts, rather than lumping that concept under a false label of radical free market philosophy. #10

In addition, we are disturbed by the characterization of the "Status Quo" alternative as a no action alternative. While recovery efforts have had mixed results across the basin, the status quo involves an enormous effort mostly paid for with ratepayer dollars. Further, this effort has seen large improvements in mainstem passage. The lack of recognition of those improvements in the Draft EIS is inappropriate in light of the need to engage in an "All-H" effort while being mindful of the legal restriction that BPA be responsible only for effects of the hydro system. #11

There are other labeling issues that concern us throughout this document. For example, the reference to "industry" is misguided. This is used to describe the entire range of economic interests in the region as if they all had a profit motive inconsistent with the health of fish and wildlife (Draft EIS 2.4.2.2). Even more disturbing is that power ratepayers are lumped into this category as if they had no different standing as citizens and as customers of BPA. The fact that most utilities receiving power from BPA are not-for-profit entities serving everyday citizens of the region seems completely overlooked. There is a list of "Major Participants" in fish and wildlife efforts in the region at Draft EIS 1.3.1 on which "Other regional interests" are listed at the bottom almost as an afterthought. Since utilities are nowhere mentioned, we must assume that utilities (including those with major hydroelectric and fish mitigation operations in the region) must fall into this afterthought group. Again, coming from BPA, this view of the customers paying for this EIS is unhelpful in a process that claims to seek regional consensus. #12

There is another misguided aspect to the Draft EIS that we observed. The document seems to propose making a policy decision based on an oversimplified model that melds several separate and outdated sets of scientific results. This includes an unwarranted reliance on the unworkable "Multi-species Framework Process" and reliance on documents that are supported by old and discredited science such as the PATH process. In the past, BPA has argued for better use of better science during the creation and now implementation of the 2000 Biological Opinion. Thus, this Draft EIS so reliant on the stumbling Framework Process is strangely discordant. (Draft EIS 5.3.1) #13

Since the original science has been found wanting, how does BPA presume to achieve accurate results in determining policy choices with a monstrous amalgamation of that science conducted at different times, by different people, for different purposes.

The worst result of this misapplication of the science is that throughout the Draft EIS the action items are presumed to have biological results that are either not proven or are still in the midst of heated debate among the region's scientists. Of course, BPA recognizes the limitations of the science as "not yet sufficiently refined to resolve the many technical difference of opinion..."

(Draft EIS p. 15). But, this deficiency does not deter BPA from the unfortunate repetition of many unproven theories regarding salmon recovery for purposes of this Draft EIS.

We appreciate BPA's perceived need to begin to address NEPA issues. We understand the difficulty of collecting and organizing the large amount of information involved. And, we applaud the goal of moving towards more coordination in the region. However, we believe the agency would be better served if it focused more on how to bridge the gap with other regional entities rather than creating its own new fish and wildlife policy making apparatus that seems destined to conflict with its primary duty to assure the Pacific Northwest an adequate, efficient, economical and reliable power supply. #14

Thank you for this opportunity to comment on the Fish and Wildlife Implementation Plan Draft EIS. We acknowledge the hard work that has gone into this document, and we appreciate your willingness to consider our views.

Sincerely,

Scott Corwin
Manager, Government Affairs
Pacific Northwest Generating Cooperative
503-288-1234

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-019
RECEIPT DATE:
AUG 27 2001

From: Barbara Birnbaum [barbarabirnbaum@hotmail.com]
Sent: Monday, August 27, 2001 1:20 PM
To: comment@bpa.gov
Subject: Comments on Fish & Wildlife Implementation Plan DEIS

TWIMC;

After careful consideration, I am submitting the following suggestions which
primarily developed from the "Natural Focus" with some extra emphasis on the
"weak stocks."

1. Restore habitat employing both passive and active techniques, particularly in restoring heavily damaged ecosystems.

2. Decrease harvest for all but the very strongest species with close attention to the numbers returning.

3. Discontinue hatcheries.

4. Remove four to six dams, with the ones considered most harmful to weak
stocks being given priority in removal.

5. Decrease commercial activity except for the very strongest species.

6. Allow limited tribal harvest of healthy fish and wildlife populations.

#1

believe the above will benefit both salmon and all the other wildlife species which utilize the same ecosystem.

I further believe that if we are somewhat patient and allow a reasonable

timeline for Nature to take advantage of our positive steps, we will ultimately (and not that far off) be able to benefit ourselves with greater
harvests of fish and wildlife.

#2

Thank you for this opportunity to express my opinion.

Barbara Birnbaum
2021 4th Ave N Apt A
Seattle WA 98109-2165

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http://explorer.msn.com/intl.asp

Telephone comment by Ginny Kuehn
8/27/01

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-020
RECEIVED:
AUG 27 2001

Joseph Demir
19446 South Myers Road
Oregon City, OR 97045
503-656-1382

Breach the dams and save the fish!

I have been fishing the Columbia River for years and have seen the fish runs go up and down. If we don't breach the dams we will have no spawning grounds for the wild fish. #1

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-021
RECEIVED:
AUG 27 2001

Telephone comment by Ginny Kuehn
8/27/01

Karen Carlson
503-590-4557

I have read your EIS report. I like to see some breaching of the dams in five years or less, because the salmon will be extinct in 16 years and we don't have to let them wait to be extinct and having to pay all of the tribes billions of dollars over something we could have prevented. #1 #2

Thank you.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: FWIP-022
RECEI E:
AUG 27 2001

Telephone comments by Ginny Kuehn
8/27/01

Lester Carlson
503-590-4557

Was reading the draft EIS paper, I guess you folks sent it to me. It concerns me about the spring and summer salmon runs in the Snake River and the steelhead too. For what I can read in this thing, they won't even consider breaching the Snake River Dams for ten years. I would like to see them breached a lot sooner than that. I think those fish might be in trouble and need help sooner than that. So put my word in that I would like to see the dams breached. #1

Thank you.