

35. JOE ABBEY

Comment:

After reviewing the Draft Environmental Impact Statement on Lower Snake River Fish and Wildlife Compensation, I feel very strongly in opposition to the proposed cost estimate of \$47,000 plus for spending for lands. I am more in favor of directing the efforts toward the lands that are already under Corps control, rather than acquiring more.

Response:

The Corps is developing the existing Federally controlled land adjacent to the river. The on-project program may supply more than half the needed wildlife compensation with the development of over 1,000 acres of intensive wildlife habitat. The habitat potential of the existing project land has been considered in planning the total compensation program.

36. MR. & MRS. WILFORD THORN

Comment:

The mitigation proposal involving land acquisition, discussed in the February 1975 Draft Environmental Impact Statement, is impractical, unreasonable, and highly unsuitable in these times.

It seems very pleasing to fish and wildlife departments, specialists in these narrow fields, environmentalists, and sportsmen--although one real sportsman said at one of the hearings, "Don't give me all this easy access and hatchery-raised fish and coddled game--I'd like some challenge left." How very unfair to go to the "centers of population" for the preliminary hearings, when it is the private possession of land and homes of rural people which is involved. (Yes, we are grateful that you granted two additional hearings, two months later upon demand of rural folk.) How very unfair, too, to "alert appropriate conservation groups to support this report," as urged in the preliminary report. How very biased to include the many pictures glorifying hunting and fishing--and to omit the more-readily available pictures of 1) the Monday morning mess of beer bottles, papers, cardboard boxes, cans, gates, broken and trampled fragile ground-cover (the "multiple use concept" in action); and of 2) old people being harassed by government men pushing them to become "willing sellers." The willing-seller concept is much too easily subject to human abuse.

Response:

The revised draft environmental statement has indicated some of the problems with littering and vandalism that occur on public access lands by those people who may abuse the opportunity. It is expected that the willing seller would not be abused.

Comment:

We encourage further carefully made but simple and inexpensive plans for development of the already-federally-owned project lands (continuous strips on both sides of this 150-mile stretch of river!) as given in Appendix VI, pp. 18-106 (but advise correction of reference to non-existent "page 125"). We deplore failure to mention the number of those already-federally-owned project acres along the river, however, feeling that this was a purposeful omission; we understand that it approaches 25,000 acres, which figure would tend to diminish the alleged need for more land. We deplore, also, failure to indicate on the maps the expensive camping facilities already developed on project lands, here again because these elaborate facilities would diminish alleged need for more land and money.

Response:

The acreage of project lands is mentioned on page 3-2 of this statement. Camping facilities do not provide for wildlife habitat, except as a few songbirds may use the trees which are planted in camping areas.

Comment:

Potential for expansion is terrifying. On pp. 18-22 repeated reference to "control of grazing on adjacent lands" is finally dismissed as "beyond the scope of this report.../but/ may be considered in the future." (Colonel Conover, you have promised to strike any reference to control of adjacent lands, but you will move on and be succeeded by Corps personnel not bound by your personal promise.) There is a stated intention on p. I-3 to ask for initial funding for so-many acres with authorization to acquire more acres later. The "grasping" ramifications are unbelievable: although the Walla Walla River is not a tributary of the Snake, pictures and other references to the Walla Walla clearly include it as part of the "project area"; in repeated references to the states of Idaho, Oregon, and Washington (such as on pp. II-37 and II-38) those entire three states become synonymous with and are used interchangeably with "project area."

Response:

The discussion on control of grazing referred to has been deleted from Appendix G. While it may be desirable from a wildlife point of view, control of grazing along the Snake River canyon on adjacent lands is not planned by the Corps. Proposed wildlife watering devices (guzzlers) on 1/10-acre sites along the canyon rim may be fenced, after, such sites would be acquired from willing-sellers. The reason for the description of the wide area is that hatchery and wildlife land has not been specifically indicated at this time; therefore, three states are covered. As indicated in Appendix I, the hatcheries could be located over a broad area.

Comment:

Potential for expense expansion is also terrifying: estimated cost in the 1973 draft was \$40,264,000 with annual O&M of \$2,534,500; estimated cost in the '75 draft is \$47,972,319, with annual O&M of \$3,071,000.

We've all lost, with the building of the dams--fish and game and scenery and farmland--but no one speaks on a 100-year compensatory program for the farmer's lost income potential on now-inundated land and homesteads and powerline infested fields. The entire mitigation concept is untenable--simply because it has no end! ... True, we've gained the needed power, but all of us have gained, and that includes the sportsman.

Response:

National economic inflation has been responsible for the increased cost of development. Sportsmen benefited from the establishment of power generators from the Lower Snake River Project; however, the Corps is not allowed to write off as compensation power production for hunting or fishing recreation days. Farmers were paid the market price for their land prior to its inundation.

Comment:

We know that you, Colonel Conover, would honor your courteous responses made at the Columbia County Commissioners' hearing this spring. Should this entire proposal be endorsed by Congress, three of your commitments could mitigate a few great hurts, to a tiny degree, at least: striking reference to control of adjoining lands, obtaining approval of county planners before making major land purchases, and granting satisfactory waterhole access to Ben Dickinson and many other cattlemen in like situations.

Response:

Every effort would be made to insure that the project implementation would follow such provisions.

37. ESTHER EAGER

Comment:

I am Esther Eager, native of Columbia County. I am pleased to be able to submit once more, my objection to being mollified or appeased or given compensation, or as mitigation, for fish and wildlife losses by the creation of the Lower Snake River Project. That is the four locks and dams. Really we don't need mitigation, since the creation of the dams, we have more and better access to the river than we have ever known. Because a great many people travel to the Snake River to look and look at the beauty of the area, it won't be the same if those beautiful coves and draws are cluttered with your fences which you say will protect watering places. Really there is more than enough water in the river for all wildlife.

Response:

It is true that the fencing will have an esthetic effect; however, to a certain extent it will blend in with terrain and habitat plantings. The availability of river water for both livestock and wildlife is not the problem. It is the cattle grazing uncontrolled along the project shoreland that destroys the food and cover vegetation which is needed for wildlife to survive. Restricting the cattle watering and grazing to defined watering corridors allows this vegetation to grow. Because the banks of the reservoirs are ripped with large boulders, the water in the Snake River is inaccessible for many forms of wildlife.

Comment:

How many of the fish return to the ocean will escape the Russian and Japanese nets? Who net so near our coastline. Also how can one know that the dams have caused a great loss of fish? There was no way of knowing how many there were before the dams were made and supplied their fish ladders and counting areas.

Response:

Indications are that Columbia River salmon are not harvested right now by the Russian and Japanese fishing fleets. The fish agencies have conducted extensive studies on the fish runs and feel that they come up with sufficient pre-project information to justify the indicated loss estimates.

Comment:

It is a great waste of money trying to outguess a goose as to where it wants to nest. The oil cans and the baled straw were not acceptable. Let the goose be the judge. If there is paucity of good nesting in one area, leave it to the goose, it will find one to its liking.

Response:

Tests would be made of the floating goose nesting devices before extensive funds are spent on these items. People who have studied geese for several decades believe that this device could be the best for inducing goose nesting on an artificial structure. Because the Lower Snake River Project flooded many goose nesting islands in the Lower Snake River, there is need for compensation.

Comment:

If all the money being spent on wildlife was used instead to police the vandals the wildlife could take care of its self. And what of the land being taken out of production for food? I find no place where you discuss the difficulties which mitigation causes local government by reducing the tax base and impairing adjacent land use. It seems that you have gone ahead with your plans, with utter disregard as to input you received from the landowners that was given you at the two meetings of 1973, held in Dayton and Colfax July 24 and 26. These meetings were extremely well attended. And you are trying to please only the sportsmen with whom you met in Richland Washington May 22 and Lewiston Idaho May 24. Page IX-1 and page IX-2 quote, these above meetings which were public, caused the noted fish and wildlife authorities to review the plans, the same reviewing was done by the Department of Game. But? Again the property owner was not considered. And quote, on page 1 you wrote Draft ----- Final environmental statement. Final? I hope not.

Response:

The establishment of hunting easements would enable the game department to keep a closer eye on hunters using the area, and thereby possibly reduce the indiscriminate shooting and vandalism caused by a small percentage of hunters.

Discussion has been added concerning the tax base and the effect of wildlife habitat on adjacent land use. Plans have been adjusted in response to views expressed by landowners with acreage reductions. Game Department (no condemnation) acquisition, etc. The statement referred to was a draft statement and the fact that it says "draft" and "final" is part of the required format. The word draft was marked with an (X) to signify the draft status.

Comment:

The draft environmental impact statement on the Lower Snake River has I must say very attractive pictures, I would call them before pictures what of after pictures? I can see the after picture, the happy looking sportsman gone, the ground littered with food wrappers of any kind small enough for the pocket. And if he comes upon a fence to private land and climbs the wires? That is the cause of loose wire result, see opposite page IV-21. Picture of deer caught in loose wire. In trespassing onto private land the sportsman scatters weed seed that have clung to his clothing, which he picked up in your weed areas, which you call fine ground cover. Or he cripples your livestock and sometimes kills them. What ever mood he is in. All these things have happened to us.

Don't disregard the property owner who has productive land, remember he feeds the nation even government workers.

Response:

The Corps is aware of the problems of private landowners with regard to hunters' abuse. Efforts can be made to create feelings of respect between sportsman and the landowner. We realize the great value of farm output for the nation. Indiscriminate shooting and littering has been mentioned in this revised draft environmental statement.

38. WESLEY L. EAGER

Comment:

I am Wesley L. Eager, property owner and native of Columbia County, State of Washington. The February 1975, draft environmental impact statement on Lower Snake River Fish and Wildlife Compensation, has disregarded the input from local government and local property owners and citizens.

The 1973 hearings were held in Lewiston Idaho and Richland, Washington seemingly for the benefit of the sportsman and recreationist who are not the property owners and tax payers in this area. Due to this, the 1973 hearings had to be reopened, to hold hearings in Dayton, Washington and Colfax, Washington for you to hear from property owners and tax payers bordering the Snake River. These meeting hearings were well attended and lasted until midnight. The Corps should have, but did not use the input from these last two 1973 hearings. Why have you turned a deaf ear to these two hearings???? And cooperate only with the sportsman????

Response:

The Corps of Engineers has not disregarded the input from local government and local property owners and citizens as voiced in the 1973 public meetings held in Dayton and Colfax. Some adjustments in the proposed plan and the methods of implementation have been made. The Corps is aware of the opposition to any Government purchase of land in certain sections of the State of Washington; however, it is still obligated by law to evaluate and compensate for fish and wildlife losses.

Comment:

Private citizens have held this land since the settlement of the Lower Snake lands. Now the sportsmen have lobbied and operated in devious ways to swing the pendulum to have this area developed for nothing more than their sheer pleasure.

Response:

Because of diminishing wildlife habitat areas, wildlife populations and associated recreational opportunities are shrinking, while the increasing human population causes overcrowding at existing parks and other recreation areas. These factors, coupled with a growing energy, recreation, and food requirement, have led to the evaluation of land use programs and potentials in all areas of the nation. The proposed fish and wildlife compensation plan will not decrease substantially the productivity of the southeastern Washington agricultural areas. The proposed plan is to develop "core" wildlife habitat zones to be used for hunting, fishing, or non-harvest use. These areas would be located near watercourses in narrow strips which should not greatly interfere with current agricultural practices.

Creation of the four lower Snake River dams has resulted in the need for fish and wildlife compensation. This compensation would involve increased hunter use of some existing agricultural lands. On the other hand, the dam projects have made possible (by power availability and reduced pumping head), new irrigation and substantially increased agricultural production on many acres of land in southeastern Washington that were previously of little or no use for farming. In considering overall trade-offs in resource use, the lower Snake projects (including other compensation programs) would still result in a net gain for agriculture, even though different farmers or ranchers may be involved.

Comment:

I am opposed to your mitigation plan, and due to the omissions of the input in 1973, I consider this 1975 draft invalid. Page one in the EIS draft, quote..ANOTHER ALTERNATIVE, AT LEAST IN CONCEPT, IS THE REMOVAL OF THE DAMS, end of quote. I consider this out of place, utterly childish and perfectly ridiculous.

Response:

Input obtained at the 1973 public meetings was not omitted from consideration. When examining the problem of mitigating for fish and wildlife losses, it is conceivable that removal of the dams would return the river eventually to its pre-dam construction state, and thereby return the fish and wildlife population to the pre-dam level. This would result in other effects such as loss of power, water for irrigation, navigation, and flood control, but it is an alternative for the mitigation of fish and wildlife losses.

39. MR. MORTON R. BRIGHAM

Comment:

I have been studying the progress of negotiations between the Corps and the Fish and Game Department of Idaho relative to mitigation of wildlife losses caused by the Lower Granite project.

As usual in our dealings with the Corps, we appear about to lose some more of what we have had in the past. This sort of thing has earned the Corps the name "Public Enemy Number One".

The Lower Granite project is an eyesore at best. Now it is proposed to add wildlife losses to the horrible appearance of the project, and to its horrendous loss of fisheries resources.

I have always wondered why the Corps insists on the ruination of America. Is it something learned in one of our educational institutions? Can it be that all the Corps can do, as some of its critics say, is to kill and destroy and ruin?

I have heard a lot of propaganda that indicates the Corps has acquired a "New Look"; that it has finally become aware of its responsibilities to the environment. Next, along comes the Lower Granite mitigation fizzle and we are right back where we started years ago.

Response:

The Corps is working on the development of compensation measures to increase population of steelhead, summer and spring chinook salmon, resident trout, and spiny ray fishery. The Corps is making a serious effort to offset any fish and wildlife losses caused by the Lower Snake River project system.

40. MR. EDWARD NAUGHTON

Comment:

I believe in the dam pools tree stumps could be anchored in bays and coves to improve the bass fishery. This is being done by the Columbia Basin Bass Club with good success in several lakes in the basin. Bass could be taken from several ponds in the McNary wildlife project and transplanted to the pools behind the Snake dams.

Response:

The fish and wildlife compensation program would involve a review of possible measures to increase the bass fishery on the lower Snake River as well as the Columbia River area. Even without the compensation program, Corps biologists are interested in improving the bass fishery.

Comment:

I do not agree with the views of Dr. Buss WSU on game bird stocking. My hunting the past 10 years has been on McNary and Sunnyside Wildlife recreation area. Also hunt the areas planted by the Washington Game Dept in the Hoover area below Finely and Ringold. I have very enjoyable hunting at all these places. In a year with a very poor hatch of birds there is not very good hunting even in areas of good cover with planted birds there are always birds for the weekend hunter. These areas are a little easier for hunters without dogs.

Response:

Noted. Varying opinions exist on the validity of game bird stocking. The proposed compensation plan includes both habitat development and a period of bird stocking.

Comment:

Would like to see the eastern cottontail rabbit established along the Snake River. I have found in the area from Prosser to Sunnyside this cottontail provides better and sportier shooting. This animal is much larger than the small desert cottontail found in the Columbia Basin and the area along the Snake and Columbia Rivers.

Response:

Establishment of the Eastern Cottontail Rabbit within the project area may come under conflict with the current programs of the Washington State Department of Game inasmuch as it would compete with the mountain cottontail and the desert cottontail which are native to the region. However, your suggestion would be taken into consideration if the Fish and Wildlife Compensation program were implemented.

41. CHARLES H. THRONSON  
ATTORNEY FOR ELMER DERUWE AND OTHERS

Comment:

This entire project is based upon assumed serious losses to fish and wildlife resources of the Lower Snake River Area occasioned by the construction of four dams therein. While there may have been some damage to these resources, the contemplated reaction to the damage approaches the ridiculous.

Response:

The National Marine Fisheries Service, the U.S. Fish and Wildlife Service, and the fish and game agencies of Washington, Oregon, and Idaho helped in the preparation of the proposed recommendation for fish and wildlife compensation, and it's their recommendations on which this report is based. Two independent consultants, one for the wildlife habitat development and one for the hatchery development program basically concurred with the recommendations of the Federal agencies in that the estimates were indeed valid.

Comment:

An analytical report has apparently been made by the Walla Walla District of the Corps of Engineers which purports to measure damage and recommend compensatory measures. This report has ostensibly been held for public review; but, in effect, the preparation of this report and recommendations therein included have

been constructively concealed from the general public. While we may concede that there has been some damage to the salmon and steelhead runs of the Snake River due to building of these dams, we do not concede that all the measures contemplated in this project are appropriate for mitigation of the fish damage. As to any possible damage to wildlife, the basis of this project would seem to ask us to believe that the existing game animals along the Snake River simply stood in place and let the water rise around them and drown them as the pools behind the dams were filled. All game animals that were there before still exist. Not only is the wildlife presently available for consumptive and non-consumptive use by recreationists, but also it is now more accessible in that the property wherein the game lives is now owned by the Federal Government and open to public use. Obviously, before the construction of the dams and the condemnation of the property around the pools, this property was held by private landowners and in some instances closed to trespass.

Response:

Four public meetings, several other group meetings, and a public review of the draft environmental impact statement do not indicate that the compensation planning has been "concealed from the general public." The majority of the loss of wildlife occurred due to the elimination of critical winter habitat cover and regimes. Therefore, even though animals moved up the canyon to the flat ground, the next winter they weren't able to find adequate food and/or shelter to prevent death. Some animals do remain in those areas which were not flooded by the project, and these areas can maintain some animals, but not to the extent of those estimated in the pre-dam era.

Comment:

Any damage to the migratory runs of steelhead and salmon may be more easily and economically mitigated than the project contemplated herein. Technology exists today to protect the migrating smolts. Floating deflectors and revolving screens have been used successfully to protect these young fish from the intake ducts of the turbines.

Response:

Traveling screens are being used but they are still somewhat in the developmental stage; however, this form of fish protection does not compensate for the loss of spawning grounds in the 150 miles of Lower Snake River. Much of the fishery compensation program is to compensate for loss of spawning grounds. Also, all smolt cannot be directed from turbines by screens. Some go over the spillways, too. Screening and hauling also has some inherent mortality.

Comment:

Where none existed before the development of the Lower Snake River Project, extensive and expensive state and Federal parks have been developed along the Snake River. These parks are the direct result of the Lower Snake River Project and, do, in our view, mitigate any damage which may have been done to sport recreation in Southeastern Washington.

Response:

It is true that the Corps has installed many high quality recreational parks along the lower Snake River; however, these parks cannot be used to compensate for fish and wildlife losses. The parks do not significantly aid game bird populations or provide hunting opportunity because they are for a different form of recreation.

Comment:

This entire project is placed upon a faulty premise of extensive and serious losses to the fish and wildlife in the Lower Snake River area. The question then logically emerges as "Why, then, does this project exist?" There are subtle forces at play which we feel are the real motivating factors behinds this entire exercise. The local Department of Game has, by long standing tradition, ineptly managed the game resources of this area and insulted and affronted the local landowners. Over the years this has resulted in the closure of private lands to trespass in the name of recreation. Since the local Game Department has no power to condemn private property and therefore perpetuate their own ineptness, they have enlisted the help of the U.S. Government. There are no willing sellers, or, at least, very very few, as contemplated in this ridiculous proposal.

Response:

This opinion is noted.

Comment:

The honest citizens and farmers who are being subjected to this defense activity against their own government then wonder if their land will eventually be condemned simply to propagate the original mistake that is being made by starting this Mitigation Project.

Response:

The Corps would not condemn any land to be used in the wildlife habitat development program, the hunter easement program or fishermen

access and easement program. Land for hatchery sites will be condemned, if necessary, due to the necessity of placing the hatcheries in an appropriate location.

Comment:

The Draft Environmental Impact Statement does not comply with the National Environmental Policy Act or the State Environmental Policy Act because of its lack of particularity. The National Environmental Policy Act and the State Environmental Policy Act contemplate and intend that an Environmental Impact Statement will be prepared before any major governmental action is taken. The intent and purpose of these acts is that the public shall be made aware, in particularity, of the proposed action of the government, especially in relation to any possible environmental impact of such actions. The subject statement is not sufficient to meet the intent and purpose of the law in that it does not describe with particularity the location of the proposed governmental action.

Response:

The draft environmental impact statement is appropriate for a preauthorization type of statement. The development of hatcheries will be described in supplemental environmental impact statements in more specific detail.

Comment:

A reading of the Draft Environmental Impact Statement for this project points out its defect with clarity. As to the project lands, the Impact Statement is definite and clear as to what the environmental impact will be. Then the statement goes further to talk in general terms of possible environmental impacts to indefinite and unspecified property. The statement does not delineate which rivers and which property on these rivers will be the subject of this project. This vagueness and generality defeat the Impact Statement. How can local or state governments or the local citizenry be appraised or make intelligent conclusions in relation to the environmental impacts of the major government action when such parties cannot know where, and under what circumstances this action will take place.

Response:

Appendix G in the statement indicates the on-project site development of wildlife habitat as well as the means and methods supported for the establishment of such habitat. Appendix I indicates some of the potential hatchery site locations. The actual wildlife habitat development cannot be pointed out due to the fact

that it is willing-seller and locations that are not established. Wildlife lands may be identified over a ten-year period. Local citizenry has been aware of the project and has supplied comments both through public meetings and written statements. It is believed that the impact statement is adequate to provide information and comments on the overall proposal.

Comment:

The vagueness and generality of the Draft Environmental Impact Statement for this project is so deep and implicit within the statement as to constitute a violation of due process of law as contemplated by the above mentioned Environmental Act. Such violation of the intent and purpose of the laws renders the Impact Statement invalid and a continuation of these activities affords interested parties injunctive relief through the courts.

Response:

The Courts have not developed a standard by which to determine the adequacy of environmental statements. Court decisions vary across the Nation. Administrative guidelines indicate that environmental statements are to be prepared to match the scope of a particular project decision document, in this case, the compensation report. As project studies and planning become progressively more detailed, accompanying environmental impact statements are prepared in more detail. The environmental impact statement process includes provision for updating and/or preparing supplements. Supplements would be prepared for each hatchery after the program is authorized and as hatchery sites are being determined.

42. \*BONNEVILLE  
POWER ADMINISTRATION

Comment:

We are greatly disturbed at the magnitude of the compensation measures proposed by the Fish and Wildlife Service and the Corps of Engineers, and the extent to which payment for such compensation is intended to be allocated to power revenues. Our general reaction is that while the documentation contains a great deal of detailed data, there are a number of areas where information

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\* Due to distribution difficulties, these comments were not received in time for sequential arrangement.

assessing compensatory needs is either unsubstantiated or totally lacking. We believe that in view of the uncertainties involved a much more modest program would be appropriate, to be expanded only if future data and events warrants.

Response:

Admittedly, complete data on the total losses to fish and wildlife caused by the project (all four lower Snake River dams) are not available. Sufficient data do exist, however, to verify that a substantial loss has occurred and will continue to occur through the life of the project unless compensation is provided. Studies conducted by the fish and wildlife agencies in recent years, under contract with the Corps, have further refined the data beyond that which appeared in their basic report. We also retained two independent consultants who are renowned in their fields to review the fish and wildlife agencies' report, our draft report, and all available data. These consultants agreed that much data were lacking but that sufficient data did exist to verify that the claimed losses were real and minimum and that the recommended compensation measures were, at the time their reports were prepared, the best means according to present technology to replace these losses. Our report provides for substantial reduction in off-project wildlife compensation over that recommended by the fish and wildlife agencies and also provides for an adjustment in the level of fishery compensation to reflect the results of other programs such as juvenile transportation, spillway deflectors, additional powerhouse construction, and power peaking.

Comment:

Even if we were to agree, which we do not, that the construction costs and O&M costs cited by you in your letter of July 18 accurately reflect the monies needed to compensate fish and wildlife losses in the area, we would still have certain basic reservations. In the first place, the construction costs allocable to the four Lower Snake dams average slightly under 83.8 percent. Instead, the Corps has, in addition to such allocation, added a specific cost to power as well as the joint-use costs ascribable to navigation and power. This questionable method, unsubstantiated in discussions with your staff, results in a conclusion that 97.8 percent of the compensation costs must be repaid by power revenues. Further, we understand that the figures cited in your letter are based on 1974 prices. By the time the plan is implemented, we may expect that the total costs will increase significantly. Based on preliminary studies by the Bonneville staff, the annual costs projected in your report would be equivalent to about 3-½ percent of Bonneville's total revenues last year. We estimate that your proposal would by itself necessitate a rate increase to Bonneville's customers of 2 to 3 percent.

Response:

The allocations for the Lower Snake projects, except for Ice Harbor, are preliminary and subject to change. Preliminary indications are that the final allocation on the upper projects will show a considerably higher percentage of joint-use costs allocated to power than is shown in the present preliminary allocation. It is anticipated that the new allocation of joint-use costs to power will be in excess of 90 percent. With over 90 percent joint-use costs allocated to power, there would be less than 10 percent reduction in the actual power costs if the compensation for turbine losses were not considered to be a separable power cost as proposed.

Comment:

This raises an ancillary objection on our part, which is that BPA's customers, namely, public agencies, investor-owned utilities, and industries, spread over the entire Pacific Northwest, who are most adversely affected by the proposed mitigation plan, were not given an opportunity either to participate in the public meetings held 2 years ago or to review the Special Report and the Draft Environmental Impact Statement. We consider this deficiency serious enough to cast a cloud on the adequacy of your EIS.

Response:

The Environmental Impact Statement (EIS) was published and listed as available in the Federal register. The EIS was advertised through a public notice which was posted in Federal Post Offices as well as listed in newspapers. Bonneville Power employees attended all four public meetings on the Compensation Report. The meetings were publicized and any individual or agency that wished to would have been able to attend.

Comment:

We also have specific comments as follows:

We are concerned with the number of possible inaccuracies in the estimates of fish losses from the dams reported in the Draft Environmental Statement and related reports.

The additional compensation figures of \$46 million plus \$3 million annual operation and maintenance expenditures are based on a few key estimates concerning the fish runs in the Columbia River and hatchery costs, a change in any one of which would alter the compensation figures significantly.

Response:

The estimates of fish losses are based on many years of fish counting records, catch statistics, and research studies on the extent and causes of losses at the dams. These losses were verified by Dr. Salo, University of Washington, who was retained as a consultant to review the data. The estimated cost of compensation facilities was based on actual costs of hatchery facilities and estimated land values at the 1974 price level. It is quite probable that these costs will rise in accordance with future price increases in materials and land values.

Comment:

In the following cases, these underlying estimates are subject to question. Admittedly, these doubts are primarily due to the fact that adequate data simply does not exist:

1. It was assumed that 15 percent of the downstream migrant anadromous fish would be killed at each dam they passed. This accumulates to 48 percent of an initial run which could be killed passing through the four dams in question.
2. The fish run, which was reduced by the four dams, was estimated using the maximum number of fish passing McNary Dam between 1954 and 1972, multiplied by the first or second highest proportion of the fish passing McNary Dam which passed Ice Harbor Dam between 1962 and 1967. The reason for using the first and second highest runs was allegedly due to the inadequacy of the counts. Since fish runs are naturally subject to extreme annual variability, this method of estimating the size of the run damaged by the four dams should be investigated further.
3. The estimated size of the hatchery facilities required to produce replacement fish are based on catch-to-escapement ratios and return-to-spawner ratios, which are questionable.
4. The estimation of the angler-days lost, as a result of the reduced fish runs, was hazy and should be investigated further. The number of angler-days should be offset by the number of other types of recreation-days gained through use of the reservoirs for other water-based recreation pursuits.

Response:

It is estimated that 15 percent of the downstream migrant anadromous fish would be killed at each dam they passed. Many studies have been made on fish survival through the turbines and an accepted value of 15 percent for each dam complex is thought to be reasonable. Studies by National Marine Fisheries Service at Ice Harbor Dam indicate a 30-percent mortality to salmonid smolts passing through the turbines including mortalities due to predation of stunned fish.

Many studies have verified a direct mortality without predation of 11 percent to turbines of the type in use in the Lower Snake projects. Considering the fact that in the future, with the increased number of turbines, most of the water will pass through the turbines, an estimated total mortality of 15 percent per dam may be conservative. In passing of the four-dam complex, this would result in accumulative 48 percent loss of salmon smolt. Since ocean mortality on salmonoids spending a year or more in salt water are not likely to be density dependent, a 48-percent smolt kill can be translated into a 48-percent reduction in returning adults.

Doctor Salo, who evaluated the report, adjusted the Fisheries Service's estimates on the run accuracy concerning return-to-spawner ratio. However, he didn't feel that there was enough variability involved to change the original estimate. The Fish and Wildlife Coordination Act (Section 602 (b)) also states that "Recommendations of the Secretary of the Interior shall be as specific as is practical with respect to features recommended for wildlife conservation and development, lands to be utilized or acquired for such purposes, the result expected, and shall describe the damage to the wildlife attributable to the project and the measures proposed for mitigating or compensating for these damages. The reporting officers in project reports of the Federal agencies shall give full consideration to the report of the State agency on the wildlife aspects of such projects, and the project plan shall include such justifiable means and measures for wildlife purposes as the reporting agency finds should be adopted to obtain maximum overall project benefits". Data used by the fish and wildlife agencies is adequate to meet the requirements of the Fish and Wildlife Coordination Act. The lack of pre-dam construction data severely limits the comprehension of the total impact of the projects, but there is enough available to come up with realistic appraisals of losses. In all but one instance, the highest year count was used to calculate the loss. In this case, the 1962 fall chinook count at Ice Harbor, the highest count was so excessively higher than later counts that the base figure was reduced to the second highest year through negotiations with the fishery agencies. This method of computing losses for compensation purposes has been accepted by the Federal Power Commission in determining the level of compensation to be provided by Idaho Power Company.

The estimation of angler days lost was provided by the fishery agencies and was calculated in the same manner as angler-day losses assigned to all other projects. These calculations present the number of angler days prior to project construction and an estimate of angler days after construction, both with and without compensation. The use of other water-based recreation pursuits cannot be substituted directly for angler day losses. The Fish and Wildlife Coordination Act states that fish and wildlife losses due to project construction or operation will be replaced to the maximum extent practicable.

Comment:

The analysis presented should include calculations on the sensitivity of the final compensation figures to variance in the above underlying estimates.

Response:

Our preliminary analysis shows a direct relationship in sensitivity between the number of fish to be mitigated and the size and cost of hatchery construction.

Comment:

Your cost-benefit analysis incorporates the use of figures whose origins have not been set forth. Specifically, while you do indicate that the user-day values used in computing your benefit-cost ratios are based on the Water Resources Council's "Establishment of Principles and Standards for Planning," dated September 1973, no attempt has been made to provide the reviewer with any justification for using these particular figures. Why, for example, are consumptive uses such as hunting given a user-day value of \$9, while appreciative uses such as photography or birdwatching are given a user-day value of \$2.25. These figures should be explained in this document. It would seem that, in view of the crucial importance of such figures to the benefit-cost ratios subsequently derived, there is an implicit obligation to provide reviewers with the logic originally employed in developing these numbers.

Response:

The user-day values were used in accordance with established policy for Federal agencies. Section X, page 24788 of the Federal Register, 10 September 1973, states:

"These Principles for Planning Water and Land Resources shall be implemented by the Water Resources Council and shall be applied by river basin commissions, other Federal-State organizations, and each of the Federal departments and agencies. The Office of Management and Budget; the Council on Environmental Quality, and other organizations in the Executive Office of the President will use these Principles in their review of proposed project, basin, or regional plans."

The Principles for Planning Water and Land Resources currently allow a maximum value of \$2.25 to be used for a general recreation day i.e., birdwatching and photography, and they allow a maximum value of \$9.00 to be used for a specialized recreation day i.e., hunting and fishing. Page 24804 of the above Federal Register discusses the restrictions on recreational day values.

Comment:

In addition to the above concerns, there are several assumptions contained within your cost-benefit analysis which we believe seriously question the accuracy of the figures ultimately arrived at, and which tend to bias the derived benefit-cost ratios in favor of benefits.

Your cost figures for fishery compensation facilities and wildlife compensation facilities appearing in tables 9, 14, and 15 include only the direct Federal cost attributable to the facilities in question.

Response:

The benefits to be derived from the compensation efforts for fish losses are of National and regional importance and have not been assigned to individual projects. There are sufficient data to show that the losses have been caused by the projects, however, so it is appropriate that the costs of compensation should be charged to the Lower Snake River benefit-cost studies. The recommended compensation actions are required to replace project-caused losses and return the resource to a level which existed prior to project construction, and are not benefits to the total project. The benefit-cost ratios discussed only evaluate the efficiency of moneys to be spent in relation to the value of the resource to be replaced.

Tables 9 and 14 also show the operation and maintenance costs which are to be provided by the states.

Comment:

While you do not explicitly set forth, as we have mentioned above, the justification behind the user-day values employed in deriving the annual benefits resulting from the fishery and wildlife compensation facilities, we assume that such values are derived from the total average expenditure per day resulting from a particular activity. For example, the user-day value for hunting would include not only the cost of a license, but also travel, lodging, equipment, and other related expenses incurred in the pursuit of that activity. In the interest of consistency, therefore, and accurate analysis, it is necessary that all costs resulting from your proposal be included in your benefit-cost analysis, not merely direct Federal costs of building and operating the proposed compensation facilities. Costs which might warrant consideration would be increased vandalism on the part of users, greater danger of hunting accidents, and destruction due to increased usage of off-road vehicles.

Response:

The user-day values used in deriving the benefit-cost ratios for compensation facilities were first established by Senate Document 97, later revised by Principles and Standards. These values do not include travel, lodging, equipment, and other such expenses. It is assumed that if hunting and fishing were not available that these expenses would be spent on some other activity. The \$9.00-per-day value for hunting and fishing is termed a "net value" or the value of being able to hunt and fish over and above the secondary expenses. National Marine Fisheries Service has attempted to evaluate direct secondary expenses and has estimated that the value of a fisherman day for salmon and steelhead is as high as \$28.00 per day. Predicting exactly the additional cost of increased vandalism and destruction cannot be made at this time, or at least not to an extent that is reliable. An assessment of these costs has been indirectly accounted for, however, in operation and maintenance costs and cost of easements.

Comment:

Another assumption implicit in your analysis is that the various uses identified and employed in arriving at the benefit figures and benefit-cost ratios may not necessarily be additive. The maximum utilization of a given area for hunting purposes may discourage appreciative non-consumptive uses such as wildlife photography and birdwatching. This acquires added importance in view of the fact that many forms of appreciative use are on the increase both in absolute terms and in relation to consumptive uses as you have noted on pages 56-57 of the report.

Response:

The Corps' project lands will be opened for everyday use including those areas of intensive wildlife habitat development. Corps' lands will be available all year and not just for the hunting season. Therefore, consumptive - non-consumptive conflicts would not occur to any great extent.

Comment:

Your benefit-cost analysis is somewhat inconsistent with your earlier assertions regarding the difficulty in prorating costs to specific facilities. On page 25 of the Special Report, the point is correctly made that it is impossible to accurately prorate total fish losses (an external cost) to individual hydro projects due to the nonavailability of sufficiently detailed data. A corollary to this would be that it is at least equally impossible to accurately prorate total benefits to the individual projects contained within the Lower Snake River Fish and Wildlife Compensation Plan (Table 15). This is especially true in view of the highly speculative nature of the total annual benefit figure contained in Table 15.

Response:

Please refer to the first paragraph of the first response on page A-73.

Comment:

The alternatives are shortsighted. The "no action" alternative doesn't really discuss the ultimate effects of this alternative, e.g. "the no-action alternative would not increase the population of game and non-game species to their previous levels." But there is no discussion of the resultant effects--will hunters shoot something else, will the hunting industry suffer setbacks, etc.

There is no discussion of impacts of dam removal to the river. Although this is unrealistic, it is nevertheless an alternative which should be considered.

The report only briefly discusses transport of fish past the dams by truck; there is no mention of other viable alternatives, including:

- (1) Partial mitigation, i.e., bringing the fish runs up to 50, 75, or 80 percent of the base level;
- (2) Optimizing one or more kinds of fish, i.e., chinook to the exclusion of steelhead; or
- (3) Eliminating parts of the proposal such as the pheasant farms or fishing access.

This lack of alternatives probably stems from a vagueness in defining objectives. It is not clear from the report whether the objectives of the proposal are to return the fish and wildlife associated with the Snake River to their original state (or as close as possible), to compensate hunters and other recreationists for loss of opportunity, or to return hunting and fishing activities to approximately their original potential.

In any event, there is no clear record of fish and wildlife situation prior to installation of the dams, thus making an accurate mitigation estimate impossible.

Response:

The alternatives section will be reworked and additional infor-

mation will be used regarding the alternative actions. This will all be available in the Final Environmental Impact Statement and the report. Partial mitigation, bringing the fish up to 50, 75, or 80 percent of the base level, would not meet the requirements as set forth in the Fish and Wildlife Coordination Act which we are obligated to do. Optimizing one kind of fish, that is chinook, to the exclusion of steelhead would not replace the species in kind which is the intent of the Fish and Wildlife Coordination Act. Elimination of such proposals as pheasant farms or fishing access would not provide, as said before, the fullest extent of species compensation as well as opportunity availability as intended through the Fish and Wildlife Coordination Act.

Comment:

During the past several years, much money and effort have been expended to mitigate losses of fish runs; for instance, devices to reduce supersaturation of nitrogen, fish ladders, transportation of young fish by special truck, and fluctuation in streamflows. We expect these efforts to continue. We, therefore, believe that these mitigation efforts should be costed out and credited against the compensation figures proposed in your reports.

Response:

The results of nitrogen supersaturation reduction, juvenile transportation and other measures have not been fully evaluated because some of these are still under study or under construction. If the Compensation Plan is authorized, a full accounting of the benefits derived from these measures will be made before hatchery construction is initiated. For the present, however, we believe it is more proper to request the maximum compensation now rather than to assume some level of success which may not occur which would require further Congressionally authorized compensation efforts. The present cost of construction of fish passage facilities, spillway deflectors, traveling screens, operation and maintenance of these facilities, and associated research is \$52,000,000. This is shown on page 8 of the Special Report.

Comment:

In addition to our comments, we would like to pose the following questions which we believe the Corps should respond to in its reports:

1. What are the current total annual costs of proposed fish and wildlife compensation measures?
2. What is the basis for allocating such annual costs?
3. Are the measures recommended in the Special Report adequate by themselves to compensate for fish and wildlife losses?
4. Does the Corps plan to embark on a combination plan encom-

passing measures proposed in the Special Report combined with spillway deflectors and transportation? If so, the combined beneficial effects as well as the combined costs of such measures should be analyzed in developing the compensation plan.

5. What would be the annual costs and anticipated benefits if an alternative of spillway deflectors and expanded collection and transportation program were to be adopted?
6. What criteria does the Corps propose to use to ascertain whether the construction of facilities is in excess of a compensatory measure? During discussion in August, the Corps stated that facilities for enhancement of fish and wildlife would not be allocated for power repayment.
7. Will wildlife development on Government lands tend to diminish the need for off-project development?

Response:

1. The 1974 price level was \$45,788,000 initial cost and \$2,951,000 for annual operation and maintenance. Updating these to current levels, the costs are \$49,987,000 initial cost and \$3,222,000 annual cost.

2. The costs will be allocated equally among the four projects and then distributed to the power and navigation features based on the project cost allocation.

3. The measures recommended in the Special Report are expected to fully compensate for fish and wildlife losses caused by the Lower Snake River project.

4. The benefits derived from spillway deflectors and juvenile transportation will be taken into account in sizing the final hatchery construction, as will any adverse effects from additional powerhouse construction and power peaking operation.

5. We cannot at this time provide an economic analysis of the effects of spillway deflectors and expanded juvenile fish collection and transport since the full benefits will not be known for a number of years yet. The results of these programs to date are very encouraging but we do not anticipate that they, in themselves, will negate the need for hatchery construction.

6. When a final decision is made on the number and size of hatcheries to be constructed, it will contain an agreed-upon level of production and return. The agreement with the operating agencies will stipulate that if this level is exceeded then either production will be reduced or a non-Federal agency will assume the costs over and above mitigation costs.

7. In our analysis we have attempted to seek the maximum economically feasible amount of mitigation by development of project lands. In so doing, we have reduced the amount of off-project lands requested by the agencies. We do not believe it is economically possible to provide full wildlife compensation on project lands and there will be a continuing need for developed off-project lands.

Comment:

Finally, we would like to point out that under the Flood Control Act of 1944 and the Bonneville Project Act of 1937 cost allocations of Corps projects from which power is marketed by BPA must be confirmed by Federal Power Commission. The question of whether the allocation of power of 97.8 percent at the Lower Snake projects for fish and wildlife compensation is one that should be considered by the FPC in its confirmation of the Corps' proposed allocation.

Response:

All cost allocations for Corps' projects containing power as a project purpose are approved by the Federal Power Commission (FPC). Only Ice Harbor has a final approved cost allocation at this time. Allocations for the other three projects will be submitted to the FPC for approval and the costs of the proposed compensation measures will be distributed between the authorized purposes of power and navigation based on the approved allocation.

43. \*WASHINGTON PUBLIC UTILITY  
DISTRICTS' ASSOCIATION

Comment:

Certainly it is understandable that construction of dams does have an effect on salmon and steelhead. Therefore, it has been an accepted practice for hatcheries to be paid for by power users and provided to offset any estimated supposed fisheries losses. What is not understandable, however, has been the location of these hatcheries. If there is a continuing problem caused by passage of fish over or around dams, then it would seem more logical to construct any replacement hatcheries below the dams on the Columbia/Snake Rivers' system if our main purpose is to maintain the Columbia River fisheries as a food source. It appears wasteful of funds to try to maintain upstream fisheries at a substantial cost to the many just to provide recreational pleasure to a few.

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\* These comments were not received in time for sequential arrangement.

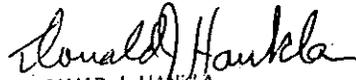
General Comments

We do not agree with the concept that proposed measures would compensate (fully offset) project incurred losses to fish and wildlife. Mitigate (lessen project incurred losses) is the appropriate term.

Project incurred wildlife losses in Idaho are not adequately addressed in the preliminary draft Special Report for Compensation of Fish and Wildlife Losses nor in the draft environmental statement. Consequently, we believe the wildlife compensation plan submitted by Idaho Department of Fish and Game has merit.

We appreciated the opportunity for early review of the draft statement and preliminary fish and wildlife loss compensation report.

Sincerely yours,



DONALD J. HANKLA

Acting Regional Director



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

OREGON STATE OFFICE  
P.O. Box 2965 (729 N.E. Oregon Street)  
Portland, Oregon 97208

IN REPLY REFER TO:  
1793 (911)

April 16, 1974

District Engineer  
U. S. Army Engineer District  
Walla Walla, Washington 99362

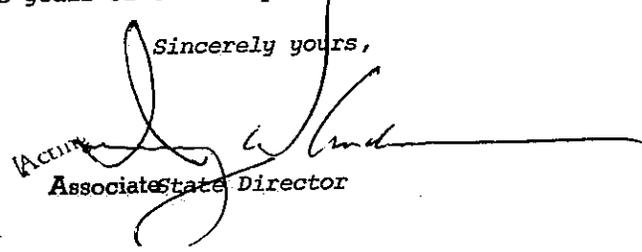
Gentlemen:

We have reviewed the draft environmental impact statement and special report on the Lower Snake River, Fish and Wildlife Compensation, Washington, Oregon and Idaho and offer the following comment:

Pages I-2, Section f., Pages I-3, Section a & b, Pages II-1, Section (1), and Pages II-3, Section (2)

Acquisition of lands and easements - The BLM does not manage a great deal of land adjacent to this part of the Snake River in the project area. However, there are some National Resource Lands along the lower Grande Ronde River in Washington and Oregon. Some of the land and/or easement acquisitions contemplated in implementing the Corps' Fish and Wildlife Compensation project could be coordinated with BLM to possibly improve public access to some of the N.R.L. tracts along the Grande Ronde River. Such access would provide greater hunting and fishing opportunities for the public and further the goals of this compensation project.

Sincerely yours,

  
Associate State Director

Response:

The Corps could locate new hatcheries nearer the mouth of the Columbia River. This would be a more efficient operation from the standpoint of obtaining adult spawning stock and reducing project-caused losses to both adult and juvenile fish. It would not, however, replace the loss in the upper river area where it occurred, nor would the fish be available to the sport, commercial, or Indian fishery from which they had been lost. Moreover, the increased density of salmonid fish holding in the Lower Columbia may result in higher incidence of disease, and these salmonids' contribution to the ecological balance of the Snake River and Tributaries would be greatly eliminated.

Comment:

It is beyond my comprehension how the raising of water along the banks of the river, by means of a reservoir, changes the characteristics of access for steelhead fishermen to such an extent that you must acquire by fee extensive parcels of land from which they may now wade or launch boats into the water. What did they do for this access before the dams were built?

Response:

The river provided a steelhead fishery which was always accessible by boat. The lower water levels allowed a much higher potential for access to key fishing locations. The reservoir eliminated these key fishing areas. Therefore, access to other key fishing areas is necessary to compensate for lost opportunity.

Comment:

Certainly, development of wildlife habitat on project lands is proper because all useful lands including project lands should be available for such development.

Response:

The Corps is developing the project lands to the highest wild-life use. This development has already substantially reduced the amount of off-project land necessary for compensation.

Comment:

The reservoir may flood some of the existing draws, but surely the same draws are in the same relative position as regards public roads as before construction of the dams. If hunters got to the water before the dams were built they should be able to get there after the dams are built without extensive leasing of lands at a cost to the electric ratepayer.

Response:

The easements in draws is basically to provide chukar hunting opportunity. Other easements provide hunting opportunity near the intensive wildlife habitat area during the hunting season. Because hunting will be concentrated in these habitat areas, access must be assured and maintained to a much greater extent than before.

Comment:

Buying of lands for a "hunting preserve" is not justified. Having been born and raised in woods and spending considerable time in logging camps, I have found that Mother Nature can make adjustments in the relocation of nests, feeding areas, etc., for wildlife to a better extent and at considerable less cost than man. Land has been inundated by reservoir water, but the wildlife has not been drowned out to the extent where a special hunting preserve is justified. Following the principles being proposed her, every city in this Nation should require their taxpayers to furnish money to go out and acquire game lands for every square foot of concrete which has been poured for the "compensation of game animals and hunter opportunity not provided on" city lands. The quote portion is from your letter.

Response:

The reports from State and Federal wildlife agencies as well as confirmation from an independent consultant indicates that critical wildlife habitat was lost. With the habitat, the wildlife was lost. The Fish and Wildlife Coordination Act is directly concerned with compensating for the highly productive riparian land located near water resource projects. The Corps' intensive wildlife habitat development program will compensate for this lost riparian productivity.

Comment:

To require the electric ratepayer to finance a game bird farm to stock the "compensation lands" referred to in item "e" (above comment) is outrightly unfair.

Response:

The fulfillment of the Fish and Wildlife Coordination Act requires that the hunting opportunity also be compensated. The compensation program requires around 20,000 pheasants per year. The Washington State Department of Game believes that a game bird farm would be the best means to provide these birds. This compensation results from the loss caused by the dam complex. The electrical power generation is the dams' major function; therefore, those benefiting from the projects should bear the compensation costs.

(LETTERS OF COMMENT FOLLOW)



# United States Department of the Interior

BUREAU OF INDIAN AFFAIRS  
Northern Idaho Agency  
Lapwai, Idaho 83540

April 8, 1975

## Memorandum

**To:** Area Director, Portland Area  
Attention: Jack Hunt, Land Services

**From:** Superintendent, Northern Idaho Agency

**Subject:** Review of Draft Environmental Impact Statement, Lower Snake River Fish and Wildlife Compensation

Due to the very short time being allowed for review, it has been impossible to review in detail the contents of this Environmental Impact Statement. Our office has had only two days to review the Statement and has not been able to review it with the Nez Perce Tribe. We are sure the Tribe would definitely want to study the Statement in depth. Our office will discuss the plan with the Tribe and give them an opportunity to review it and make their comments.

In reviewing the tables on "Hatchery Requirements to Produce Required Number of Adult Chinook and Steelhead," we note that survival from eggs to smolts is fairly good, but survival of smolts to adults is very low. Table 1, "Summary of Facilities and Costs of Wildlife Compensation Facilities, Lower Snake River Project," does not provide for any money for a study to improve this survival rate. Page VI-3 briefly mentions a study being conducted on truck transportation to insure steelhead survival.

Indian treaty rights concerning fishing are briefly discussed under "Management Methods," page VI-6. It would appear that with the Court decisions already rendered, the Tribes should be given a greater opportunity to participate in the formulation of a plan involving compensation for fish and wildlife lost with dam construction on the Lower Snake River and on the Columbia River.

Bill Bryan  
Acting Superintendent

FEDERAL POWER COMMISSION

REGIONAL OFFICE

555 BATTERY STREET, ROOM 415  
SAN FRANCISCO, CALIF. 94111

April 8, 1975

Colonel Nelson P. Conover  
District Engineer  
Walla Walla District, Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, WA 99362

Dear Colonel Conover:

This is in response to your letter requesting our comments on your draft environmental statement for "Lower Snake River Fish and Wildlife Compensation," of February 1975.

As described in your documents, the proposed action would consist of construction of fish hatchery and associated facilities and acquisition of lands for wildlife habitat improvement and access for fishing and hunting. This would be done to compensate for adverse impacts on fish and wildlife resources caused by the construction of the existing four multiple-purpose projects on the Lower Snake River.

We have reviewed the draft to determine the effect on matters affecting the Commission responsibilities. Such responsibilities relate to the development of hydroelectric power and adequacy of electric services under the Federal Power Act, and the construction and operation of natural gas pipelines under the Natural Gas Act.

Although the action indicated in your proposal would require minimal amounts of power for pumping irrigation water and water for use in irrigating certain portions of the wildlife habitat, it would not have any measurable effect on any existing electric power or natural gas facilities under the jurisdiction of the Federal Power Commission, nor does it appear to have any effect on the future development of supplies and transmission of electric power or natural gas.

Sincerely yours,

*M. Frank Thomas*  
M. Frank Thomas  
Regional Engineer



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region  
Fourth and Pike Building  
Seattle, Washington 98101

L7619  
(PNR)CAE

April 11, 1975

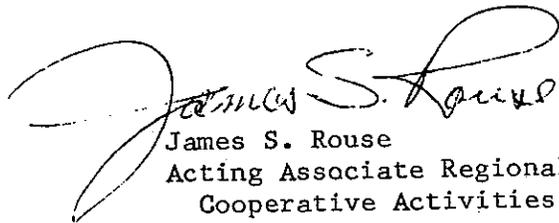
Colonel Nelson P. Conover  
District Engineer  
Walla Walla, Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

We have reviewed the draft environmental statement and special report on the Lower Snake River, Fish and Wildlife Compensation, Washington, Oregon, and Idaho.

We suggest that you consult the State Historic Preservation Officers of Washington, Idaho, and Oregon to determine if any sites eligible for the "National Register of Historic Places" will be affected by the proposed actions. The results of these consultations should be reported and documented in the final statement.

Sincerely yours,



James S. Rouse  
Acting Associate Regional Director,  
Cooperative Activities

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION X

1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101



REPLY TO  
ATTN OF:

TORAOFA - M/S 623

April 9, 1975

Colonel Nelson P. Conover, CE  
District Engineer  
Department of the Army  
Walla Walla District, Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

We have reviewed the draft environmental impact statement, "Lower Snake River Fish and Wildlife Compensation for Fish and Wildlife Losses, Washington and Idaho."

The draft EIS implies that fish hatcheries alone will compensate fish losses resulting from the construction of lower Snake River locks and dams. It deals heavily therefore, with the impacts of hatchery development on water quality and the environment. The capital cost of the fishery mitigation program is estimated by the Corps to be \$42,250,000 and annual O&M cost \$2,950,000. Annual costs amortized over a 100-year project life are estimated to total \$2,770,265 in 1974 dollars. It is apparent that the Federal government will pay this cost even though navigation and power interests are the major beneficiaries of the river development.

In addition to the hatchery program, the EIS should address the entire anadromous fish passage and survival program including plans for minimizing dissolved gas supersaturation, providing minimum required stream flows and preventing downstream migrant mortalities at each of the four dams. In other words, all factors and alternatives associated with additional compensatory needs and with the continuation and improvement of mitigating operations throughout the lower Snake River, together with their impacts, should be included.

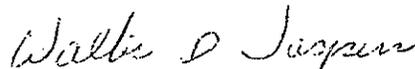
The draft statement discusses hatchery waste in some detail indicating that some type of treatment may be required at each of the four hatcheries. Current effluent limitations for hatchery discharges under the NPDES permit program now address suspended solids as the only parameter for which

controls will be required. Among the parameters discussed in the statement however, suspended solids are not specifically mentioned. Suspended solids limitations currently proposed for Best Practicable Treatment Technology, Best Available Treatment Technology, and New Source Performance are 15 mg/l (maximum), 2.2 lbs/100 fish (average) and 2.9 lbs/100 fish (maximum daily). It is not clear in the draft statement whether or not waste treatment facilities are included in the fish hatchery program cost estimates.

Our comments on this draft statement have been classified ER-2, ER (Environmental Reservations) 2 (Insufficient Information). The classification and the date of the Environmental Protection Agency's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our review on proposed Federal actions under Section 309 of the Clean Air Act.

Thank you for the opportunity to review this draft statement.

Sincerely,



Walter D. Jaspers  
Director  
Office of Federal Affairs



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

1500 N.E. IRVING STREET

P.O. BOX 3737

PORTLAND, OREGON 97208

April 11, 1975

Reference: RB

Col. Nelson P. Conover  
District Engineer  
Walla Walla District, Corps of Engineers  
Bldg. 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

In accordance with March 20 instructions from the Director of our Department's Office of Environmental Project Review, we have reviewed the draft environmental impact statement and accompanying preliminary draft of a Special Report for Compensation of Fish and Wildlife Losses, Lower Snake River, Washington. Comments are limited to those within our areas of jurisdiction and special expertise and should not be construed as official Departmental comments. We understand that Departmental comments will be provided following an anticipated subsequent request from the Chief of Engineers to the Department of the Interior.

#### DRAFT ENVIRONMENTAL IMPACT STATEMENT

Page 1, 3.a. Environmental Impacts. This statement should be qualified. Increased populations will partially offset project incurred losses.

Page 1, 3.b. Adverse Environmental Impacts. We do not agree that problems in excess of those otherwise incurred would result with the project plan. Hunting and fishing would have exceeded that anticipated with the plan. "Compensation" as used throughout the statement is inappropriate. For example, terrestrial habitat inundated can never be replaced or its loss fully offset.

Page I-2, sec. d. Operation and maintenance costs for hatcheries will not necessarily be funded through the U. S. Fish and Wildlife Service, but possibly through the National Marine Fisheries Service, or the appropriate State agency.

Page I-8, 2nd para., 3rd sen. The fish and wildlife agencies in the Special Lower Snake River Compensation Report recommended the Touchet and Walla Walla rivers as areas for stocking rainbow trout as compensation for lost Snake River resident sports fishing. However, due to irrigation withdrawals and farming practices which cause low summer flows, high turbidity and high water temperatures, these streams do not provide quality fish habitat. The upper reaches of these streams do provide adequate fish habitat but are already stocked by State programs.



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Reservoirs proposed by the Bureau of Reclamation could improve water quality in these rivers and enhance the fisheries. However, enhancement benefits would be assigned to that project. Fish used to compensate Snake River losses cannot also be assigned enhancement benefits.

Page II-37/38, Threatened Species of Wildlife. The spotted owl is found west of the Cascade Mountains, not in the project area.

Page III-1, Wildlife Habitat Lands. It is stated that these lands would be committed to wildlife use and inferred that only wildlife would benefit. All land uses dependent on wise ecosystem management--i.e. agriculture, water supply, etc.--would also benefit.

Page IV-2, sec. c., Compensation or Management Alternatives. Trapping and hauling downstream migrant fish should be considered a temporary and not a final solution to dam related mortalities.

Page VI-8, sec. c., Genetic Alteration of the Fish. While a few salmonid species will spawn in lakes, all require graveled areas for successful reproduction. Even if strains of reservoir spawning salmonids are developed through selective breeding, gravel beaches will be required for successful spawning.

PRELIMINARY DRAFT SPECIAL REPORT FOR COMPENSATION OF FISH AND WILDLIFE LOSSES

Page 8, 1st para., 2nd sen. At least one of the subimpoundments on Lower Granite is blocked to public use because of the fenced railroad right-of-way. The steep canyon wall behind the impoundment appears to preclude access from any other direction. The goose nesting island upstream from Chief Timothy Park may not be used due to the expected human activity at the park.

Page 18, 1st para., last sen. Even though percentage of McNary fish passing over Ice Harbor Dam has increased, actual numbers of fish have declined.

Page 25, Lower Snake River Resident Sport Fishery. Same comment as for Page I-8, 2nd para., 3rd sen. in draft EIS.

Page 36, 1st para., 3rd sen. Losses to downstream migrants due to turbines is based on three installed turbines at each dam, not six.

Page 39, 2nd para. Same response as for Page 18, 1st para., last sentence.

Page 68, para. 2. We suggest "substantial loss reduction" be substituted for "full compensation" since inundated wildlife lands can never be replaced.

Page 74, 2nd full para. The first sentence is inaccurate. We agree with Washington Department of Game that with habitat development on project lands it would still require control and management of substantial farm lands adjoining the project to significantly reduce project incurred losses.



IN REPLY  
REFER TO: 160  
120.1

United States Department of the Interior  
BUREAU OF RECLAMATION

PACIFIC NORTHWEST REGIONAL OFFICE  
FEDERAL BUILDING & U.S. COURTHOUSE  
BOX 043-550 WEST FORT STREET  
BOISE, IDAHO 83724

APR 15 1975

Colonel Nelson P. Conover  
District Engineer  
Department of the Army  
Walla Walla District, Corps of Engineers  
Bldg. 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

The draft environmental statement and special report on the Lower Snake River, Fish and Wildlife Compensation, Washington, Oregon, and Idaho (ER 75/259) have been reviewed by appropriate personnel in this Region and we have no specific comments to provide. Thank you for the opportunity of reviewing the statement and report.

Sincerely yours,

*John R. Woodworth*  
Regional Environmental Officer

cc: Commissioner, Attn: 150  
Director, Office of Environmental Project Review, USDI, WDC



*Save Energy and You Serve America!*



# United States Department of the Interior

## BUREAU OF MINES

EAST 315 MONTGOMERY AVENUE  
SPOKANE, WASHINGTON 99207

Western Field Operation Center  
March 31, 1975

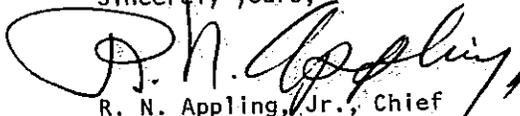
Mr. Nelson P. Conover, Colonel, C.E.  
District Engineer  
Corps of Engineers  
Building 602  
City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

Personnel in this office have reviewed the Draft Environmental Statement and Special Report on the Lower Snake River, Fish and Wildlife Compensation, Washington, Oregon, and Idaho (ER-75/259).

The increase in fish and wildlife population and facilities to implement this action will not adversely affect mineral development in the Lower Snake River area.

Sincerely yours,

  
R. N. Appling, Jr., Chief  
Western Field Operation Center



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF OUTDOOR RECREATION

NORTHWEST REGION

IN REPLY REFER TO:

E3027  
ER-75/259

[REDACTED]  
915 SECOND AVENUE, S.W., 990  
SEATTLE, WASHINGTON 98174

APR 16 1975

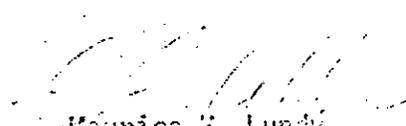
Department of the Army  
Walla Walla District  
Corps of Engineers  
Building 602  
City-County Airport  
Walla Walla, Washington 99362

Attention: Nelson P. Conover, District Engineer

Dear Mr. Conover:

We have reviewed the Draft Environmental Impact Statement and Special Report on the Lower Snake River, Fish and Wildlife Compensation Program for Washington, Oregon, and Idaho and conclude that the documents adequately discuss the recreational and environmental aspects and impacts for which this office has jurisdiction and review expertise. We, therefore, have no substantive comments for your consideration in the preparation of subsequent documents relating to this program.

Sincerely yours,

  
Maurice E. Lundy  
Regional Director



DEPARTMENT OF TRANSPORTATION  
UNITED STATES COAST GUARD

MAILING ADDRESS:  
COMMANDER(mep)  
THIRTEENTH COAST GUARD DISTRICT  
915 SECOND AVE.  
SEATTLE, WASH. 98174  
PHONE: 442-5850

5922/19-1  
Ser mep 0408  
14 April 1975

Colonel Nelson P. Conover  
District Engineer  
Corps of Engineers  
Walla Walla District  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Re: (draft) EIS, Lower Snake  
River Fish and Wildlife  
Compensation

Dear Colonel Conover:

We have reviewed this project and have no comments at this time; however, we would like the opportunity to review specific site development proposals.

Sincerely,

S. S. BECKWITH  
Captain, U. S. Coast Guard  
Chief, Marine Safety Division  
By direction of the District Commander

UNITED STATES DEPARTMENT OF AGRICULTURE  
SOIL CONSERVATION SERVICE

---

1218 S. W. Washington Street, Portland, Oregon 97205

April 22, 1975

Col. Nelson P. Conover  
Corps of Engineers, Walla Walla District  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

We have reviewed the draft environmental impact statement for the Lower Snake River Fish and Wildlife Compensation Program.

We have no comments to offer.

Thank you for the opportunity to review and comment on this draft statement.

Sincerely yours,

  
James W. Mitchell Acting  
State Conservationist

cc:  
Coordinator of Environmental Activities, Office of the Secretary, USDA  
Washington, D. C. 20250  
Administrator, SCS, Washington, D. C. 20250  
Chairman, Council on Environmental Quality, 722 Jackson Place NW, Washington,  
D.C. 20006 (5)



UNITED STATES DEPARTMENT OF AGRICULTURE  
SOIL CONSERVATION SERVICE

---

Room 360 U.S. Courthouse, Spokane, Washington 99201

April 10, 1975

Nelson P. Conover  
Colonel, CE  
District Engineer  
Department of the Army  
Walla Walla District  
Corps of Engineers  
Bldg 602, City-County Airport  
Walla Walla, Washington 99362

Dear Col. Conover:

Your draft environmental impact statement for the Fish and Wildlife Compensation Program has been reviewed by our field personnel and it would appear the soil protection aspects have been adequately addressed. We would, however, be interested in ascertaining if consideration has been given to actually delineating the line between the public and private lands to enable hunters to recognize these boundaries. We believe this would be of great benefit in maintaining better public relations with the landowners.

The opportunity to review your draft is appreciated. If we can be of future assistance, please do not hesitate to call upon us.

Sincerely,

*Galen S. Bridge*

ACTING

Galen S. Bridge  
State Conservationist





## United States Department of the Interior

### BUREAU OF INDIAN AFFAIRS

PORTLAND AREA OFFICE

POST OFFICE BOX 3785

PORTLAND, OREGON 97208

IN REPLY REFER TO:

Land Services

APR 29 1975

Colonel, Nelson P. Conover  
District Engineer  
Walla Walla District  
Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

This is in reference to your request for comments on the draft environmental impact statement - "Lower Snake River Fish and wildlife Compensation" dated February, 1975. (Department of Interior ER 75/259)

Attached for your information is a memorandum from our Northern Idaho Agency.

The lower Snake River dams included in the draft occur in ceded areas of three Indian treaties.

1. Camp Stevens Treaty (Nez Perce) 12 Stat. 957
2. Camp Stevens Treaty (Yakima) 12 Stat. 951
3. Camp Stevens Treaty (Umatilla) 12 Stat. 945

Overlapping of usual and accustomed fishing places occurs between Warm Springs, Umatilla, Nez Perce, and Yakima Tribes. These sites have not been adjudicated in the Columbia basin system except for on-reservation sites. There are usual and accustomed fishing places in the area.

Considering the emphasis now being accorded Indian treaty fishing rights and the proximity of the Nez Perce Tribe, it is suggested that the tribe should receive communications related to Snake River and Snake River tributaries planning. They should have the opportunity to provide input and make their views known on alternate possibilities and have a greater opportunity to participate in plan formulation.



The alternative mentioned in paragraph one, page I-8 (expanding existing hatcheries) may not respond to the needs of the tribes. If downstream hatcheries are used, the returning salmon may not arrive in areas where Indian fishermen can harvest--tribal benefit would depend on hatchery location and related programs.

The flip lips (page IV-3, paragraph 3) should certainly reduce fish loss if we understand the data correctly, but would it actually eliminate the occurrence of nitrogen supersaturation as stated in the paragraph?

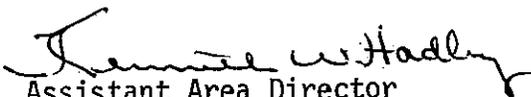
In regards to the transportation of steelhead smolts, why is it suggested that only 50% are to be transported?

There is concern on the effect of transporting juvenile salmonids on their "Homing" instinct when they return as adults--we do not know that this system will function effectively.

We appreciate the extension of time that your office permitted in order for us to develop comments on this draft.

Sincerely yours,

Acting

  
Assistant Area Director  
(Economic Development)

Enclosure



UNITED STATES DEPARTMENT OF COMMERCE  
The Assistant Secretary for Science and Technology  
Washington, D.C. 20230

April 29, 1975

Colonel Nelson P. Conover, CE  
District Engineer - Walla Walla District  
Corps of Engineers  
U. S. Department of the Army  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

The draft environmental impact statement "Lower Snake River Fish and Wildlife Compensation," which accompanied your letter of March 5, 1975, has been received by the Department of Commerce for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

A number of geodetic control survey monuments are located along the Snake River. If there is any planned activity which will disturb or destroy these monuments, the Department of Commerce, National Ocean Survey, of which the National Geodetic Survey is a part, requires not less than 90 days notification in advance of such activity in order to plan for their relocation. This Department also recommends that funding for this project include the cost of any relocation required for these monuments. We request that this advance notification be given to: Director, National Geodetic Survey, Room 304A - WSC # 1, 6010 Executive Blvd., Rockville, Maryland 20952.

The Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service has worked closely with the Corps of Engineers and the Federal and State fishery agencies of Washington, Oregon, and Idaho in the development of the compensatory measures for anadromous fish proposed by the Corps of Engineers for its Lower Snake River Project. The level of compensation proposed has been generally approved by the fishery agencies. Substantial work remains to be done on hatchery site selection and design which places a limitation on the degree of specificity with which the Corps can deal with the environmental impacts.



Throughout the statement, \$9.00 is used as the value of an angler-day for anadromous fish. The National Marine Fisheries Service has prepared a processed report entitled "Partial Net Economic Values for Salmon and Steelhead for the Columbia River System" by Merritt E. Tuttle, Jack A. Richards, and Roy J. Wahle, dated January 1975 which uses a value of \$28.00 per angler-day for anadromous fish in the Columbia River System. This value was developed on the basis of "Economic Evaluation of the 1967 Sport Salmon Fisheries of Washington" by Mathews and Brown who use techniques consistent with the Water Resources Council's "Establishment of Principles and Standards for Planning." It is our understanding that the simulated \$9.00 per day value is considered as a last resort which is to be used only when better values established by research do not exist.

#### SPECIFIC COMMENTS

##### 1. DESCRIPTION OF THE PROPOSED ACTION

##### SUMMARY OF COMPENSATION MEASURES

Page 1-2, paragraph d. This paragraph, concerning the funding of the hatcheries, includes the statement that: "Operation and maintenance would be funded through future appropriations to the U. S. Fish and Wildlife Service." We suggest that this paragraph be deleted. The matter of funding the operation and maintenance of compensatory hatcheries constructed by the Corps of Engineers is currently under coordinated review by the Departments of Army, Commerce, and Interior. It would seem inappropriate to include a recommendation on this matter at this time.

In this same paragraph, reference is made to the possibility of adjusting the level of the hatchery compensation program. Since future evaluations may require either a downward or an upward adjustment, we suggest that the third sentence of this paragraph be revised to read as follows: "Prior to the actual design of the facilities, the level of hatchery compensation will be reviewed, and possibly adjusted, taking into account such factors as the success of the screening program in protecting juvenile fish, adult returns from the transportation program, steelhead propagation at Dworshak Hatchery and adverse factors resulting from expanded powerhouses and increased peaking operations."

## DISCUSSION

Page 1-7, paragraph 1. We suggest the addition of fish trapping and fish transport facilities to the listing of facilities that will be required.

Page 1-9, paragraph 1. We suggest the addition of the main stem of the Snake River above the project area in the listing of streams that will be considered for acquisition of streamside lands for fisherman access.

## COST ESTIMATE AND ANTICIPATED BENEFITS

Page 1-10, paragraph 4. Annual benefits are estimated to be \$11,885,715. One of the factors used in calculating this figure is a \$9.00 value for an angler-day for anadromous fish. As indicated in our comments above, the National Marine Fisheries Service is using \$28.00 per angler-day. We suggest that recognition be given to this. The use of \$28.00 would obviously result in a substantially higher benefit figure.

## II ENVIRONMENTAL SETTING

Page 2-1, paragraph 1. We suggest that this paragraph be expanded to include reference to the wider range of impacts of the fishery compensation program. The national and international aspects are reflected by the following quotation from the report of the National Marine Fisheries Service and the Fish and Wildlife Service entitled "A Special Report on the Lower Snake River Dams, Ice Harbor, Lower Monumental, Little Goose, Lower Granite," dated September 1972:

"The Snake River Basin is one of the most important fish producing systems in the United States. It supports large populations of anadromous and resident fish. Anadromous fish from the Snake River, particularly chinook salmon, contribute substantially to commercial and sport fisheries in the Pacific Ocean from California to Alaska. Steelhead trout support a huge sport fishery throughout the lower Columbia and Snake River and its tributaries. Most of the adult chinook salmon and steelhead trout that migrate upstream in Columbia River past McNary Dam enter Snake River. The sport fishery for anadromous, as well as resident species has developed substantially in the lower Snake River within the past decade."

The addition of this information would assist the uninformed in understanding the importance of the fishery, including an understanding of the fishery values presented in the section on Socioeconomics on page 2-42.

## THE REGION

### 1. LAND ACQUISITION FOR FISHERY COMPENSATION

Page 2-1, paragraph 4. We suggest inclusion of the main stem of the Snake River above the project area in the listing of streams that will be considered for acquisition of streamside lands for fisherman access.

#### d. WATER QUALITY

Page 2-22, paragraph 1. The uninformed reader might be led to believe that all streams in the project area are of suitable quality for hatchery water supplies. This could be misleading since many of the streams are intermittent in flow, turbid, and too warm for anadromous fish hatcheries.

#### k. SOCIOECONOMICS

Page 2-43, Table 5, footnote 4/. We suggest the use of \$28.00 for the value of an angler-day for anadromous fish. (See our comments above).

### 4. ENVIRONMENTAL IMPACT OF PROPOSED ACTION

#### d. WATER QUALITY

### 2. HATCHERY OPERATION

Page 4-4, paragraph 2. Presumably the hatcheries would be designed so as to meet the State and Federal water quality standards and waste discharge permit requirements. It might be well to include a statement to this effect.

Page 4-4, paragraph 3. This paragraph and Table 7 are based on the assumption that the hatcheries will be operated on re-use systems. Actually it is anticipated that at least some of the hatcheries will be operated on a single pass basis as indicated for certain of the hatcheries in Appendix VIII. The reduction

of 99 percent in ammonia indicated in the last sentence of this paragraph is much higher than has been experienced at existing biofilter systems.

f. AQUATIC ORGANISMS

EFFECT OF HATCHERY OPERATION

Page 4-10, paragraph 2. At the end of the first sentence of this paragraph we suggest addition of the following: "and can result in significant quantities of undesirable solids being deposited in the streambed at the hatchery outfall."

Page 4-10, paragraph 3. The first portion of this paragraph assumes that the hatcheries will be operated on re-use systems. It is anticipated that at least some of the hatcheries will be operated on a single pass basis as indicated for certain of the hatcheries in Appendix VIII.

k. SOCIOECONOMIC

Pages 4-25 through 4-28. In the analysis of the values of the sport fishery in this section of the report, we suggest the use of \$28.00 for the value of an angler-day for anadromous fish. (See our comments above).

6. ALTERNATIVES

c. COMPENSATION OR MANAGEMENT ALTERNATIVES

MANAGEMENT METHODS

a. FISH MANAGEMENT

Page 6-6, paragraph 1. Further reduction of the commercial and sport fishery harvests is not a viable alternative action. For example, the summer chinook fisheries have been practically eliminated, yet the runs in the Snake River have all but disappeared.

b. EXPANSION OF EXISTING HATCHERIES

Page 6-6, paragraph 4. While it may be possible to expand certain existing hatcheries to fulfill some of the compensation program, there is no possibility of fulfilling all the program in this manner as indicated in the first sentence of this paragraph.

c. GENETIC ALTERATION OF THE FISH

Page 6-8, paragraph 2. We feel that this paragraph is very misleading. While it is conceivable that salmon and steelhead may adapt to spawning in limited areas immediately below the dams, the reservoirs for the most part are entirely unsuitable for salmon and steelhead spawning, and it is most unlikely that strains of these fish can be developed "that will flourish under the conditions of the series of reservoirs."

7. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Page 7-1, paragraph 2. The statement is made that an additional 18,300 fall chinook, 58,700 spring and summer chinook, and 55,100 summer steelhead could also be available for the fishery. This may be misleading to the uninformed, with the conclusion drawn that these numbers represent the contribution to the fisheries. These are the numbers of fish to be returned to the Snake River, either to or above the project area. While it is true that a portion of these fish would contribute to the sport fisheries in local waters, a large contribution would be made to the sport, commercial, and Indian fisheries downstream.

We understand that National Oceanic and Atmospheric Administration, National Marine Fisheries Service, is proposing to send comments on the Draft Special Report for Compensation of Fish and Wildlife Losses directly to the Walla Walla District Engineer, as a response to the Corps of Engineers under the Fish and Wildlife Coordination Act. These comments are not included herein because the Draft Special Report is not a part of the draft environmental impact statement.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving two copies of the final statement.

Sincerely,

Handwritten signature of Sidney R. Galler in cursive script.

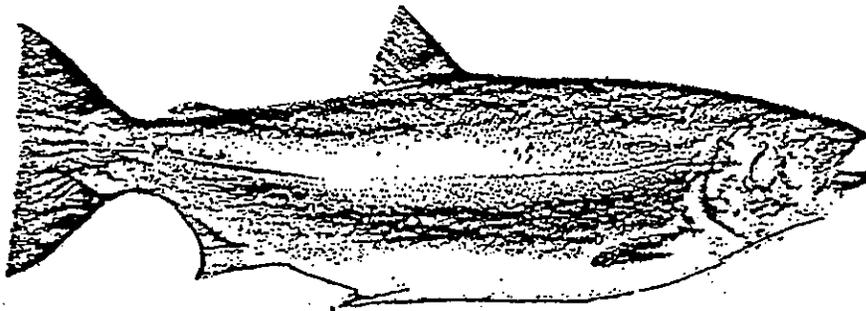
Sidney R. Galler  
Deputy Assistant Secretary  
for Environmental Affairs

Attachment

PARTIAL NET ECONOMIC VALUES FOR SALMON AND STEELHEAD  
FOR THE COLUMBIA RIVER SYSTEM

by

Merritt E. Tuttle  
Jack A. Richards  
Roy J. Wahle



U. S. DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
National Marine Fisheries Service

January 1975

UNITED STATES DEPARTMENT OF COMMERCE  
NATIONAL MARINE FISHERIES SERVICE

UNITED STATES DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
BUREAU OF SPORT FISHERIES AND WILDLIFE

A SPECIAL REPORT  
ON THE  
LOWER SNAKE RIVER DAMS

ICE HARBOR  
LOWER MONUMENTAL  
LITTLE GOOSE  
LOWER GRANITE  
WASHINGTON AND IDAHO

SEPTEMBER 1972

WASHINGTON DEPARTMENT OF FISHERIES  
Technical Report No. 2

ECONOMIC EVALUATION OF THE 1967 SPORT SALMON FISHERIES  
OF WASHINGTON

Stephen B. Mathews  
Biometrician  
Department of Fisheries

Gardner S. Brown  
Assistant Professor, Economics  
University of Washington

April 1970



# United States Department of the Interior

GEOLOGICAL SURVEY  
RESTON, VIRGINIA 22092

OFFICE OF THE DIRECTOR

ER-75/259

APR 22 1975

Colonel Nelson P. Conover  
District Engineer, Walla Walla District  
Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

We have reviewed the draft environmental statement and special report on the Lower Snake River fish and wildlife compensation, Washington, Oregon, and Idaho, as you requested in a letter of March 5 to the Office of Environmental Project Review. We offer the following comments for your consideration.

The regional geology of the Columbian Plateau, the Blue Mountains, the Northern Rocky Mountains, and the Snake River Plateau, as described on pages II-16 through II-21, is at best of little value in evaluating environmental impacts of the proposed hatcheries and wildlife areas. The landforms, slopes, geology, seismology, and engineering geology of the sites of the proposed facilities would be much more likely to reveal any geology hazards such as potentials for unstable slopes or natural foundations which may be damaging and costly to the facilities or may present dangers to the people using them.

We find the documents to be generally adequate and accurate in their description of the impact of the proposed hatcheries on the water resources of the local areas. However, we suggest that in Section IV.d, "Water Quality," some recognition be made of the possibility of ground-water impact. If ground water is used to supplement surface water (perhaps for temperature control), water-level declines in the areas of withdrawal may occur. If the hatcheries use septic tanks for domestic sewage, the



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potential for ground-water contamination exists. Ground-water contamination may also occur from leakage through settling-basin bottoms, from wastewater runoff from sludge drying beds, or from accidental spills of liquids used in connection with hatchery operations.

We thank you for the opportunity to review and comment on these documents.

Sincerely yours,

Acting

Director

*Henry W. Cochran*



STATE OF WASHINGTON

OFFICE OF THE GOVERNOR

OFFICE OF PROGRAM PLANNING AND FISCAL MANAGEMENT

HOUSE OFFICE BUILDING  
OLYMPIA, WASHINGTON 98504

LEE M. BUFFINGTON  
DIRECTOR  
206-753-5450

DANIEL J. EVANS  
GOVERNOR

May 2, 1975

Colonel Nelson P. Conover  
District Engineer  
U.S. Army Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

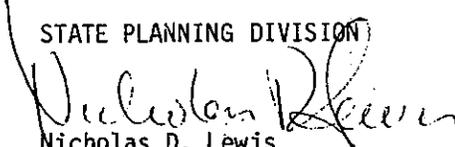
Review of the draft environmental impact statement for the Lower Snake River Fish and Wildlife Compensation Program has been completed by agencies of the State of Washington. The review process was coordinated by the Office of Program Planning and Fiscal Management, acting in its role as the state clearinghouse.

Comments received from the Department of Ecology, Department of Fisheries, Department of Game, Department of Highways, Parks and Recreation Commission, and the Department of Natural Resources are attached for your consideration in preparing the final statement.

Thank you for the opportunity to review the statement. I hope you will find these comments useful in preparing the final statement.

Sincerely,

STATE PLANNING DIVISION

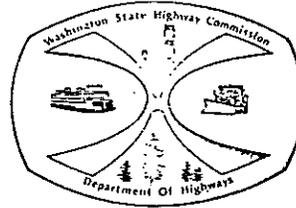
  
Nicholas D. Lewis  
Assistant Director

NDL:dc

Attachments

WASHINGTON STATE  
**HIGHWAY COMMISSION**  
DEPARTMENT OF HIGHWAYS

Highway Administration Building  
Olympia, Washington 98504 (206) 753-6005



April 23, 1975

Mr. Mike Mills  
State Planning Division  
Office of Program Planning and Fiscal Management  
House Office Building  
Olympia, Washington 98504

Corps of Engineers  
Lower Snake River Fish and Wildlife Compensation  
Draft Environmental Statement

Dear Mr. Mills:

Reference is made to your letter of March 12, 1975, requesting our review of the draft environmental statement for the above project.

We have completed our review and offer the following comments:

The possibility of increased traffic loads due to recreationists and tourists has been acknowledged, however, the statement should indicate that this may impose a premature financial burden on the Department of Highways.

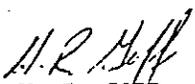
Should the Corps elect to lease or designate lands abutting state highways for recreation use a potential conflict may arise, should the highway facilities require revisions which would utilize additional right of way.

We would encourage the Corps to give thorough consideration to compatible uses for those lands, particularly recreational, that abut highways. It is hoped that this may minimize future criticism relating to highway generated noise, exhaust emission and associated vehicular effects.

Thank you for the opportunity to review and comment on this information.

Sincerely,

G. H. ANDREWS  
Director of Highways

  
By: H. R. GOFF  
Assistant Director for  
Planning, Research and State Aid

GHA:nj  
HRG

cc: T. G. Gray - District 5

April 10, 1975

State of  
Washington  
Department  
of Ecology



Office of Program Planning  
and Fiscal Management  
State Planning Division  
101 House Office Building  
Olympia, Washington 98504

Attn: Mike Mills

Re: Draft EIS: Corps - Lower Snake River  
Fish and Wildlife Compensation.

Dear Mr. Mills:

As you have requested, representatives of the Department of Ecology have reviewed this impact statement. Daming of the Lower Snake has placed tremendous stresses on the natural systems (particularly anadromous fish runs) which use the river. Fish and Wildlife compensation is an admirable goal and this EIS appears to contain a reasonably complete assessment of the proposed project.

We have been made aware, however, of local government concerns relating to the acquisition of land. The attached letter is forwarded for your information.

Thank you for the opportunity to review this document. The Department of Ecology is vitally concerned with the preservation of our States' bountiful natural amenities. We hope that any problems involved in the Lower Snake project can be resolved in order that its laudable objectives can be realized.

Sincerely,

A handwritten signature in dark ink, appearing to read "T. L. Elwell", written over a circular stamp or mark.

T. L. Elwell  
Environmental Review Section

TLE:je

CC: Department of Game  
Department of Fisheries

Enclosure

VERNON MARLL  
District No. 1

LAWRENCE TURNER  
District No. 2

PRESTON STEDMAN  
District No. 3



OFFICE OF  
BOARD OF COUNTY COMMISSIONERS

DAYTON, WASHINGTON 99328

TO: AN OPEN LETTER TO COLONEL NELSON P. CONOVER,  
U. S. ARMY CORPS OF ENGINEERS

FROM: COLUMBIA COUNTY BOARD OF COMMISSIONERS

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT  
LOWER SNAKE RIVER FISH AND WILDLIFE MITIGATION PLAN

DATE: APRIL 7, 1975

In a March 29, 1975 telephone conversation with Columbia County Commissioner Vernon Marll, Col. Nelson P. Conover of the U. S. Army Corps of Engineers promised to publicly respond to complaints which the Columbia County Board of Commissioners has regarding the proposed Lower Snake River mitigation plan. Therefore, the Board has prepared this open letter to Col. Conover defining its opposition to the plan.

I. THE DRAFT EIS CONTAINS SERIOUS ERRORS AND OMISSIONS WHICH RENDER IT INVALID.

This Board has been advised that an environmental impact statement (EIS) which contains serious errors and omissions is invalid. The draft EIS discussed herein contains numerous serious errors and omissions. For example, the draft EIS seeks authority to obtain easements over approximately 33,000 acres of privately owned land and purchase fee title to an additional 700 acres. Col. Conover, however, has informed this Board that the Corps only intends to acquire easements over 23,000 acres of land and purchase fee title to an additional 600 acres. This Board regards the failure of the draft EIS to comply with the stated intent of the Corps as a serious error which renders the draft EIS invalid. A serious omission exists in the draft EIS in its failure to consider prolific increases in bird and wildlife populations in the thousands of acres of newly created irrigated land. The draft EIS does not discuss the difficulties which the mitigation plan creates for local government by reducing the tax basis and impairing local land use planning programs. The draft EIS also fails to consider the negative impact which the mitigation plan will have on present and future private landowners. Private landowners with reasonable prudent plans to construct homes or cabins or to engage in subdivision activity will be prevented from such beneficial uses of their lands which are subjected to the mitigation easements. This Board firmly believes that any one of the above mentioned errors and omissions is of such a serious nature as to render the draft EIS patently invalid.

II. THE DRAFT EIS VIOLATES NEPA AND SEPA IN THAT IT WAS PREPARED WITHOUT THE BENEFIT OF PUBLIC HEARINGS.

The National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA) intend that environmental decisions be made in the light of public scrutiny. 115 CONG. REC. 40,416 (DAILY ed. Dec. 20, 1969) (Remarks of Sen. Jackson). The environmental decisions detailed in the draft EIS are entirely devoid of such scrutiny since the Corps has not held and does not plan to hold any public hearings on the draft EIS. Hearings were held in 1973 on a proposed mitigation plan, but the draft EIS contains concepts which significantly differ from those discussed in 1973. Such differences include changes in the number of proposed game refuges and the role which the State Game Department is to play in negotiating real estate transactions and administering the plan. Since there will be no public hearings on the draft EIS in its own right, this Board contends that the draft EIS is unlawful under the above mentioned statutes.

III. THE DRAFT EIS FURTHER VIOLATES NEPA AND SEPA BY FAILING TO PROPERLY TRANSMIT INPUT FROM LOCAL GOVERNMENT.

NEPA and SEPA contain similar language directing responsible officials to compile detailed statements for proposed actions significantly affecting the environment. Each statute continues by stating that, prior to making the requisite detailed statement the officials shall consult with and obtain comments of any public agency which has jurisdiction by law or special expertise with respect to any environmental impact involved. Comments received from local agencies and local governments are to be forwarded to prescribed agencies along with the detailed statement. This Board has attempted to provide the Corps with input and information regarding the mitigation plan. These statements and documents are published and are on file with the Corps. However, the Corps has failed to transmit such information, thus violating the above mentioned laws. Since the draft EIS has been conceived without due regard for lawfully defined procedures, this Board feels that the draft EIS and the mitigation plan espoused therein are clearly unlawful.

IV. THE CORPS CANNOT LOGICALLY JUSTIFY ACQUIRING PRIVATE LAND FOR MITIGATION UNTIL THE LAND WHICH IT PRESENTLY OWNS IS SUBJECTED TO MITIGATION PROGRAMS.

The Corps presently owns over 25,000 acres of project lands, some of which has been under Corps control for over ten years. Appendix VI of the draft EIS establishes that those lands are not presently undergoing any significant development aimed at enhancing wildlife potential thereby helping to mitigate alleged wildlife losses. Although the Corps states that it generally possesses such management authority, such a program is subject to official Corps approval and funding procedures. In view of these facts, it is entirely incongruous for the Corps to now seek the acquisition of private lands for wildlife mitigation. Until such time as the Corps can demonstrate that its own land is under a mitigation program, and the effects of such program analyzed, this Board will continue to believe that further land acquisition by the Corps for mitigation is entirely unjustified.

V. THE CORPS IMPROPERLY SEEKS TO VEST A STATE AGENCY WITH AUTHORITY TO ADMINISTER A FEDERAL PLAN.

The draft EIS proposes to establish authority in the Washington State Game Department to negotiate land transactions and administer the plan. Nowhere, however, does the Corps explain how it can effectively vest such power in a state agency. It also fails to describe how this state administrative structure is to be budgeted and how its funds will be expended. This Board firmly believes that any plan failing to accommodate questions dealing with authority and financing is simply too incomplete to comprise a valid proposal.

VI. NO VIABLE MITIGATION PLAN CAN BE DEVELOPED UNTIL AN ACCURATE APPRAISEMENT OF LOSSES IS COMPILED.

This Board feels that the mitigation proposals offered by the Corps have been developed without the benefit of an accurate appraisal of wildlife populations and habitat conditions in the project area. The Board is reinforced in this position by the attached letter of Director Carl N. Crouse of the Washington State Game Department. The failure of the Corps to accumulate persuasive pre-dam construction and post-dam construction scientific data renders any mitigation proposal so arbitrary as to be utterly meaningless.

VII. ACQUISITION OF PUBLIC ACCESS EASEMENTS ALONG THE LOWER SNAKE RIVER MAKE IT UNNECESSARY TO ACQUIRE ACCESS EASEMENTS ON TRIBUTARY STREAMS.

Public access rights to the Lower Snake River were very limited prior to initiation of the dam projects. These access rights were increased many fold with the outright purchase of over 40,000 acres of land on the Snake for public useage. In spite of this dramatic increase in public access rights, the draft EIS seeks to acquire similar rights along 150 miles of streambanks on tributaries to the Snake. This demand lacks any showing of genuine need and would constitute an unnecessary governmental infringement on private landowners along the tributaries if enacted. This Board is firmly opposed to any plan which unnecessarily diminishes the rights of private landowners.

The Columbia County Board of Commissioners has worked hard to keep abreast of environmental laws and programs. Our local efforts includes such things as land use planning programs, flood control programs, the formation of weed control districts, strict control of subdivision activity, and comprehensive solid waste management. State and federal programs which complement efforts to maintain the high quality of life in Columbia County will be steadfastly supported by this Board.

However, this Board stands firmly opposed to any plan such as the one which Corps has produced regarding wildlife mitigation when such a plan is clearly illegal, illogical and unnecessary.

*Nelson Mall*

R E S U M E

The U. S. Army Corps of Engineers has authorized the preparation of a draft environmental impact statement (EIS) which attempts to justify a plan to mitigate alleged fish and wildlife losses ensuing from the construction of four dam projects on the Lower Snake River. The mitigation plan would significantly affect local governments, private landowners and the general public.

The Board of Commissioners of Columbia County is firmly opposed to this proposed mitigation plan developed by the Corps. This Board feels that the EIS and the proposed plan were developed in disregard of many procedural considerations required by law. The Corps has not utilized available input from local governments and citizenry in reaching the decisions recommended in the plan. The Corps has also failed to base its determinations on accurate scientific data and the plan espouses demands which are not based on valid needs.

This Board feels that the proposed plan is unlawful, illogical and unnecessary. This Board further regards the major concepts described in the plan as ill-conceived bureaucratic efforts which will result in impairment of the rights of local government, private landowners and the public at large. The position of this Board is further delineated in the enclosed open letter to Col. Conover of the U. S. Army of Engineers.

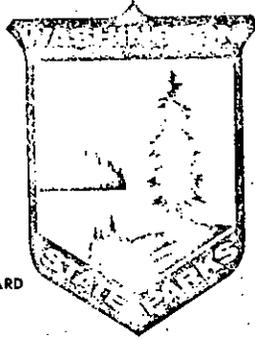
BOARD OF COMMISSIONERS  
COLUMBIA COUNTY

*James D. ...*  
CHAIRMAN

*James ...*

Attest: *John M. ...*  
*Secretary*  
April 4, 1965

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**PARKS & RECREATION COMMISSION**

LOCATION: THURSTON AIRINDUSTRIAL CENTER

PHONE 753-5755

P. O. BOX 1128

OLYMPIA, WASHINGTON 98504

IN REPLY REFER TO:

March 27, 1975

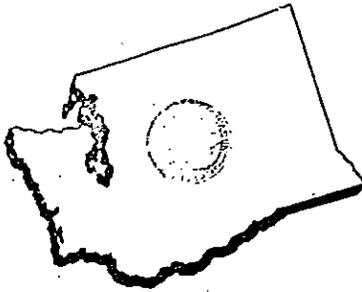
TO: Mike Mills, Office of Program Planning and Fiscal Management  
FROM: David W. Heiser, Chief, Environmental Coordination  
David Hansen, Chief of Archaeology and Historic Preservation  
RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT - CORPS - LOWER SNAKE RIVER  
FISH AND WILDLIFE COMPENSATION

The Washington State Parks and Recreation Commission has reviewed the above-noted document and does not wish to make any comment at this time.

Because specific areas to be purchased have not been identified, the Washington State Parks and Recreation Commission wishes to be kept fully informed as more detailed data concerning land acquisitions becomes available.

Thank you for the opportunity to review and comment.

sg



STATE OF WASHINGTON

Department of  
*Natural Resources*

COMMISSIONER  
BERT COLE

DON LEE FRASER  
SUPERVISOR

OLYMPIA, WASHINGTON  
98504



March 27, 1975



Mike Mills, Administrative Assistant  
Office of Program Planning and Fiscal Management  
Olympia, Washington 98504

Dear Mr. Mills:



The draft environmental impact statements for the proposed Lower Snake River Fish and Wildlife Compensation and Gifford Pinchot National Forest Timber Management Plan has been reviewed by the Department of Natural Resources. We have no comments regarding this proposal.

We appreciate having an opportunity to review this statement.

Yours truly,



BERT L. COLE  
Commissioner of Public Lands

Bruce Reeves  
Executive Assistant



BR:es

