

014-01

Comment acknowledged; thank you, your support of the proposed project is appreciated. Hatchery co-managers view this on-going fish production program as essential for conservation and recovery of spring/summer chinook populations in local, native waters of Northeastern Oregon.

014-02

Comment acknowledged; thank you. The Nez Perce Tribe and the Confederated Tribes of the Umatilla Indian Reservation have been instrumental in developing this project with the other partners.



Oregon

Theodore R. Kulongoski, Governor

015

JUL 14 2003

Department of Environmental Quality

Eastern Region

700 SE Emigrant

Suite 330

Pendleton, OR 97801

(541) 276-4063 Voice/TTY

FAX (541) 278-0168

July 7, 2003

Mickey Carter
Bonneville Power Administration
PO Box 3621, KEC-4
Portland, OR 97208-3621

Re: WQ-Wallowa County General File
Department Comments on the *Grande Ronde-
Imnaha Spring Chinook Hatchery Project Draft
Environmental Impact Statement*

Dear Mr. Carter:

The Department reviewed the *Grande Ronde-Imnaha Spring Chinook Hatchery Project Draft Environmental Impact Statement* with respect to water quality concerns. We submit the following comments on the draft document.

This is a timely discussion since the Department is currently developing water quality goals called Total Maximum Daily Loads (TMDLs) for the Lower Grande Ronde, Wallowa and Imnaha River subbasins. The Lower Grande Ronde, Imnaha and Wallowa subbasins are currently included on a list of Oregon surface waters that do not meet water quality standards. The pollutant parameters of concern in these subbasins are: temperature, sediment, bacteria, pH, and dissolved oxygen. The additional hatchery, acclimation facilities and upsizing of the Lookingglass hatchery are potential sources for increased temperature, solids, nutrients, pH, biochemical oxygen demand, and ammonia in down stream surface water. Of particular concern is temperature, the most widespread pollutant in these subbasins. The added acclimation and hatchery basins create new sources of unshaded water that when heated by solar radiation can contribute to increased water temperatures downstream of the facilities. It is important that these projects are constructed using appropriate treatment technologies and that they operate using best management practices to minimize their effects.

015-01

As the Draft Environmental Impact Statement indicates, the proposed facilities will need to acquire appropriate sanitary and process wastewater discharge permits. Some of the proposed facilities may not meet the fish-production criteria for a NPDES permit. This does not imply that these facilities lack the potential to impact water quality.

015-02

Thank you for the opportunity to comment. If you have any questions, please call me at 541-278-4623.

Sincerely,

Paul Daniello
Water Quality Specialist
Eastern Region

c Mitch Wolgamott, ODEQ-Pendleton
Elizabeth Hutchison, ODEQ-Pendleton (electronic copy)



015-01

Section 3.6.3 of the Draft EIS acknowledges that proposed facilities would employ best management practices and treatment technologies to meet regulatory requirements to protect water quality. Sections 3.2.3 and 3.6.3 of the Draft EIS (as revised in Section 2.3 of the Final EIS) also state that temperature changes due to facility operation would be minor and localized, and not expected to impact fish or exceed water quality standards. Other parameters of concern, discussed in more detail in Section 4.2.2 of the Biological Assessment (Water Quality subsections), are not expected to result in any exceedences of applicable water quality criteria as a result of project construction or operation.

015-02

Comment acknowledged; all applicable state, local, and/or federal permits would be acquired prior to project implementation. As discussed in the Draft EIS (Section 3.6), facility design and operations would include best management practices to protect water quality.

WALLOWA COUNTY NATURAL RESOURCE ADVISORY COMMITTEE

Wallowa County Board of Commissioners
101 S. River Street * Enterprise, Oregon 97828
(541) 426-4543 Ext. 11 * (541) 426-0582 - fax

ADAPTIVE WATERSHED MANAGEMENT



Based on hope
Instead of fear

*

On solutions
Instead of conflict

*

On education
Instead of litigation

*

On science
Rather than emotion

*

On employing
Human resources rather
Than destroying them

July 7, 2003

To: Communications
Bonneville Power Administration-DM-7
Box 12999
Portland, OR 97212

Comment@BPA.gov

From: Bruce H. Dunn, Chairman
Wallowa County Natural Resources Advisory Committee
101 S River St
Enterprise, OR 97828

Subject:: Grande Ronde- Imnaha Spring Chinook Hatchery Project

The Wallowa County Natural Resource Advisory Committee, Wallowa County, Oregon requests that this information regarding the proposed EIS for Grande Ronde- Imnaha Spring Chinook Hatchery Project entered into the official record. As the appointed advisory committee for the elected representatives for a rural county in Oregon, our committee is extremely interested in the economic, social, and cultural well-being of the citizens of Wallowa County. Approximately 65 percent of our 2 million acre county is under public ownership. Therefore, all management decisions on natural resources affect the citizens of Wallowa County.

Wallowa County has a long history of proactive efforts to comply with the Endangered Species Act and subsequent listings of the Snake River Chinook, Snake River Steelhead and the Bull Trout. The Wallowa County Court and the Nez Perce Tribe had the foresight to recognize the need to engage the local community in habitat enhancement prior to the listing of the Chinook Salmon as threatened under the Endangered Species Act in 1992. Their solution was to take a pro-active approach in creating a plan that would result in resource management and use that would again stimulate our economy. The Wallowa County-Nez Perce Salmon Habitat Recovery Plan covers all lands in Wallowa County, Oregon. The Salmon Plan is a voluntary plan that offers, potential solutions to the identified problems in each watershed. The county has also created the Natural Resource Advisory Committee that meets regularly, including a technical committee that is available to all in Wallowa County.

In general we support the development of hatcheries to support the Salmon recovery program of the Lower Grande Ronde stocks of Spring/Summer Chinook Salmon. Upon studying the Environmental Impact Statement we have some concerns.

On page 2-10 "Water requirements for the Lostine River Hatchery" it states that three new ground water wells would provide up to 1200 gallons per minute to the facility..."

016-01

016-02

Comment: Since the test was only done for 48 hours what effect could the removal of this much water have on the underground aquifer and the domestic water supply in the Lostine area.

016-02
(con't.)

On page 2-10 "Water requirements for the Lostine River Hatchery" it states with average river conditions, no more than about 25% of the flow would be needed for the proposed hatchery."

Comment: What's the adjudicated water rights priority date for the hatchery water. We are concerned that this use not have any priority over existing water rights.

016-03

Please consider the suggested changes carefully, so that together we can continue the work necessary to preserve the custom, culture, and economic stability of Wallowa County and our natural resources.

If you have any questions or would like to discuss these comments further, please call the Wallowa County Natural Resource Advisory Committee 426-4588 or the OSU Extension Office 426-3143.

016-01

Comment acknowledged; the support of the Wallowa County Natural Resource Advisory Committee for the conservation and recovery of chinook is appreciated.

016-02

As referenced in the Draft EIS (Section 3.6.1.1), several groundwater wells were drilled at the proposed Lostine Hatchery site – the Lostine North Well, Lostine South Well, Primary Production Well, and South Observation Well. Information from these wells, and other sources, was used to characterize the area's geology, hydrogeology, and aquifer characteristics through aquifer testing. The results of aquifer testing were summarized in the Draft EIS and presented in detail in two associated technical reports prepared by Montgomery Watson (Report of Lostine Site Production Wells Installation and Testing, February 1999, and Lostine Site Production Wells Supplemental Installation and Testing, February 2001). The purpose of the Montgomery Watson studies was to identify a sustainable supply of good-quality, disease-free water for the proposed hatchery.

To determine well production potential and to measure the effect of proposed hatchery groundwater withdrawals, Montgomery Watson conducted aquifer pumping tests in 1999 and 2000/2001. Both sets of tests showed consistent results, although slightly different groups of wells were used. Both sets of tests consisted of standard, step-rate tests (pumping at different rates for short periods of time) to evaluate well efficiency and capacity and to determine optimal pumping rates for the longer, constant-rate tests. In January 1999, the Lostine South Well was pumped at a constant rate of about 400 gpm for 70 hours while water levels were measured in the Lostine South Well and in the Hayward's well in the Lostine subdivision (about 1,500 feet south of the Lostine South Well). Maximum drawdown measured in the Hayward Well was a few inches (0.20 feet) and the well water level recovered quickly after pumping of the Lostine South Well stopped (97 percent recovery in 160 minutes). Montgomery Watson calculated a "worse case" drawdown of about 0.6 feet in the Hayward Well after 2 years of continuous 400 gpm pumping of the Lostine South Well ("worse case" because continuous pumping of site wells is not proposed).

In January 2001, Montgomery Watson conducted a 25-hour constant-rate test in the Lostine North Well, and a 14-day constant-rate test in the hatchery site Primary Production Well. For each of the constant-rate tests, water levels were monitored in three other wells including the South Observation Well (installed near the Lostine subdivision). As in the 1999 test, drawdown in the observation well was minimal (a maximum of about 6 inches) and the water level recovered quickly after pumping stopped. Montgomery Watson calculated that, if all three site supply wells were pumped simultaneously at optimal flow rates, the combined drawdown in the nearest domestic well would be about 1.5 feet after 10 weeks of continuous pumping and approximately 2 feet after 2 years of continuous pumping (for comparison, measurements showed approximately 112 feet of standing water in the Hayward well). Continuous pumping was used to conservatively estimate drawdown because simultaneous, continuous pumping of the three wells would be required for only 2 to 3 months per year under normal hatchery operations and would typically occur during the months of May and June when river levels would be at their highest (FishPro/HDR 2004b), rather than in January when the aquifer pumping tests were conducted and river levels are relatively low. Montgomery Watson concluded that desired groundwater production levels for the hatchery could be sustained and regulated without affecting production in nearby domestic wells.

Note, also, that Draft EIS Sections 2.1.1.3 and 3.6.1.1 were revised in the Final EIS to state that new groundwater wells would provide up to 1,350 gpm to the proposed Lostine River Hatchery.

016-03

Currently, no water rights have been obtained for the proposed Lostine River Hatchery. If this project is approved for funding of final design and implementation, project co-managers would apply for water rights permits from the Oregon Water Resources Department for all proposed surface water and groundwater withdrawals (see Draft EIS, Table 4.7-1). Applications for water rights are subject to public review and appeal prior to approval by the State and, possibly, requirements for additional testing and assessment of the potential effects of proposed withdrawals on other water users.

GRANDE RONDE - IMNAHA SPRING CHINOOK PROJECT DEIS

Please mail your comments by July 7, 2003

COMMENTS:

On the adequacy of the Environmental Impact Statement:

TOO MUCH \$ SPENT TO TRY + ESTABLISH A HATCHERY
WHERE IT IS NOT WANTED OR NEEDED.

017-01

On the merits of the different alternatives:

GO ELSEWHERE

Preferred ways to mitigate concerns or effects:

GO DOWN STREAM ! LEAVE THE LOSTINE RIVER
AND AREA AS IT IS !

017-02

Other:

STRONGLY OPPOSED TO THIS PROPOSAL ON THE
LOSTINE RIVER.
WE ARE PROPERTY OWNERS ON THIS RIVER AND DO NOT WANT
THIS HATCHERY. PLS GO ELSEWHERE.

Name	DOUGLAS M. BRAGG
Address	1903 LINDA LANE, LA GRANDE, OR 97850
Phone/E-Mail Address (optional)	541-962-8787

017-01

As discussed in Section 1.2 of the Final EIS, Purpose and Need for the Proposed Action, this project is intended to help in the protection, mitigation, and recovery of an important and threatened salmon species. Project planning, design, objectives, and funding continue to undergo close scrutiny by BPA, the Northwest Power and Conservation Council, and the Independent Science Review Panel relative to the potential gains/benefits to threatened chinook populations. Comments received on the Draft EIS are a part of that review. Although several comments from residents in the vicinity of the proposed Lostine River Hatchery indicate that the site is not their preference, others, including the landowner, favor the location. The site's biological, hydrological, and physical aspects contribute to its desirability for its intended function as well.

017-02

As stated in the Draft EIS (Section 2.3), Section 1.8 of the Final EIS, and the NEOH Master Plan (Ashe et al. 2000), several other potential sites in the Imnaha and Grande Ronde Subbasins were evaluated, but dropped from further consideration due to a variety of reasons, including inadequate water supply or quality, lack of available space, inadequate power supply, and/or unavailability for acquisition. One suitable site was identified on the Lostine River, downstream of the proposed Lostine River Hatchery site. This site, at the Strathearn Ranch (Grande Ronde Subbasin site 22, Draft EIS, Table 1-1), met the project requirements, but the owner ultimately decided not to make the property available. Project team members also investigated, and eliminated from further consideration, possible sites on the west side of the Lostine River. One feasible west-side site was identified, but dropped from further consideration because it would require substantially more site development (road improvements, bridge replacement, a powerline across the river, and extensive site clearing and grading); have a potentially greater impact to adjacent landowners (immediately adjacent to one residence and requiring several other residents to drive through hatchery facilities to access their property); and result in more disruption and potential impact to the natural environment (McMillen 2003, personal communication).



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

July 10, 2003

Reply To
 Attn Of: ECO-088

01-085-BPA

Mickey Carter, Environmental Project Manager
 Department of Energy
 Bonneville Power Administration - DM-7
 P.O. Box 12999
 Portland, OR 97212

Dear Mr. Carter:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the proposed **Grande Ronde - Imnaha Spring Chinook Hatchery Project** (CEQ #030238) in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. The draft EIS proposes modifications to two existing hatcheries and the construction of three new hatchery facilities on Lookingglass Creek and the Lostine and Imnaha Rivers. In addition to the no action alternative, the EIS identifies one action alternative.

018-01

We have assigned a rating of LO (Lack of Objections) to the draft EIS. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

While we have no environmental concerns, U.S. EPA has identified additional information discussed below that we recommend be included in the final EIS.

Purpose and Need

The EIS states that the modernization and augmentation of hatchery facilities is needed to increase the success of mitigation efforts and to halt the decline of spring/summer chinook runs. The EIS states that the purposes for the project are:

- providing adequate, contemporary hatchery facilities in the Grande Ronde and Imnaha subbasins and thus, further the implementation of the Lower Snake River Compensation Plan's hatchery fish production program.
- coordinate operations at existing hatchery facilities with the Fish and Wildlife Program of the Northwest Power and Conservation Council, thereby aiding Bonneville Power Administration's (BPA) efforts to mitigate and recover anadromous fish affected by the Federal Columbia River Power System.
- Aid in BPA's fulfillment of mitigation and recovery goals outlined in the Biological Opinion from National Oceanographic and Atmospheric Administration (NOAA) Fisheries on operation of the Federal Columbia River Power System.

018-02

- Achieve economic efficiencies by integration management of fish production programs and facilities.
- Be consistent with the requirements of pertinent federal laws, regulations and executive orders, and other relevant plans and programs.
- Support the Nez Perce Tribe's goal to restore anadromous fish populations and enhance the Tribe's opportunities to exercise treaty fishing rights.

Clearly, the overarching need for this project is the mitigation and recovery of the Snake River spring/summer chinook salmon stocks in the Grande Ronde and Imnaha Rivers. What is not made clear in the EIS is the actions taken and decisions that were made that led to the conclusion that this hatchery project is necessary for the mitigation and recovery of these salmon stocks. In particular, the EIS should address how the project meets BPA's responsibilities under the Northwest Power Act and the Federal Columbia River Power System Biological Opinion. In addition, the EIS should provide a detailed overview of the decisions that were made in the BPA's Business Plan, Lower Snake River Compensation Plan, Wildlife Mitigation Program, Watershed Management Program and Fish and Wildlife Program Implementation Plan that lead to the need for hatchery facilities in the Grande Ronde and Imnaha subbasins. This should include how this hatchery project will relate to efforts being taken to mitigate and recover Snake River spring/summer chinook salmon stocks through habitat restoration, harvest limitations, and hydroelectric power operations.

018-02
(con't.)

Cumulative Impacts

The Affected Environment and Environmental Consequences section of the EIS discusses the cumulative impacts the project will have on various environmental and social parameters. In most cases these discussions are limited to site specific impacts and in a few cases, impacts at the watershed scale. While the magnitude of some of the project's impacts makes it appropriate to limit the discussion to the site specific scale, other impacts can have watershed, subbasin and possibly basin scale impacts. Impacts as the result of removing riparian canopy, increasing impervious surface, and withdrawing water, can extend beyond the site specific scale. Therefore, the EIS should evaluate and discuss cumulative impacts at all the appropriate scales. In addition, when the discussion on cumulative impacts is limited to the site specific scale, the EIS should provide clear justification for doing so.

018-03

Broodstock Collection and Maintenance, Adult Holding and Spawning, Incubation and Rearing, Fish Health Management and Methods and Magnitude of Release

The EIS states that broodstock collection and maintenance, adult holding and spawning, incubation and rearing, fish health management and methods and magnitude of fish release will comply with Natural Rearing and Enhancement System (NATURES) criteria. The NATURES criteria provides for low-density rearing, natural photoperiods, limited human contact, automatic feeding with natural diet training, structures that mimic natural cover and flow regimes and volitional releases. NOAA's Conceptual Framework for Conservation Hatchery Strategies for Pacific Salmonids (1999) recommends similar criteria which are consistent with recommendations proposed in the National Marine Fisheries Service Snake River Salmon

018-04

Recovery Plan. The EIS should discuss how the NATURES criteria conform to the recommendations prescribed in NOAA's Conceptual Framework for Conservation Hatchery Strategies for Pacific Salmonids and provide justification for those instances where NOAA's criteria are not incorporated into the project's facilities development, maintenance and operation.

018-04
(con't.)

Measures of Success and Future Facilities' Plans

The proposed project has been designed to capitalize on the most current information available for the mitigation and recovery of the Snake River spring/summer chinook salmon stocks in the Grande Ronde and Imnaha Rivers. The EIS does not discuss what measures will be utilized to evaluate the project's success, what mechanisms will be implemented to improve success and what will happen if the facilities become obsolete because the Snake River spring/summer chinook salmon stocks in the Grande Ronde and Imnaha Rivers are restored to historic levels. The EIS should develop a process for evaluating the success of the project that includes mechanisms for improvements. In addition, the EIS should describe potential uses of the facilities or a plan for their removal if the project is successful in restoring spring/summer chinook salmon stocks.

018-05

Consultation with Native American Tribes

The Nez Perce Tribe and the Confederated Tribes of the Umatilla Indian Reservation are cooperating agencies for this EIS and are co-managers with the Oregon Department of Fish and Wildlife of the spring/summer chinook conservation and recovery program in Northeast Oregon. While the EIS describes some of the roles the Nez Perce Tribe and the Confederated Tribes of the Umatilla Indian Reservation play in this project, it does not provide any specifics regarding the consultation with these tribes. The EIS needs to assure that treaty rights, and privileges are addressed appropriately, consistent with Executive Order (EO) 13175 (*Consultation and Coordination with Indian Tribal Governments*). Documentation of these consultations should be included in the EIS.

018-06

If you have any questions or need additional information regarding these comments, please feel free to contact me at (206) 553-6911 or Mike Letourneau of my staff at (206) 553-6382.

Sincerely,



Judith Leckrone Lee, Manager
Geographic Unit

Enclosure

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

Environmental Impact of the Action

LO – Lack of Objections

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

EC – Environmental Concerns

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

EO – Environmental Objections

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

EU – Environmentally Unsatisfactory

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

Adequacy of the Impact Statement

Category 1 – Adequate

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

Category 2 – Insufficient Information

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

Category 3 – Inadequate

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

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

018-01

Comment acknowledged; the U.S. EPA has assigned a rating of LO (lack of objection) to the Draft EIS.

018-02

The Northeast Oregon Hatchery Master Plan (Ashe et al. 2000), incorporated by reference in this EIS, documents the process and rationale for using hatcheries to aid the conservation and recovery of chinook salmon in Northeast Oregon. Hatchery fish production programs have been operating in the area since 1984. Section 1.2 of the Final EIS summarizes the purpose and need for the program, which is generally, to help in the protection, mitigation, and recovery of a threatened salmon species. Table 1-2 of the Draft EIS also lists relevant laws, plans, treaties, and other guidance that the Proposed Action would serve to support, including the Nez Perce Tribe Treaty of 1855, Snake River Proposed Recovery Plan, Lower Snake River Fish and Wildlife Compensation Plan, Imnaha and Grande Ronde River Subbasin Plans, and the Interior Columbia Basin Ecosystem Management Program.

018-03

The majority of impacts expected to result from the Proposed Action would be limited in time (during project construction) and scale (localized to the immediate vicinity of the project). Final EIS text was added to clarify issues of scale (see Final EIS Section 1.11 and Table 1-4).

Due to the Forest Service management of the Lostine and Imnaha River corridors as Wild and Scenic Rivers, development and land use activities are limited and restricted within and around the corridors and the Proposed Action sites; and therefore, limited cumulative effects are expected. No change in water diversion, fish habitat or effluent discharge are expected from review of local county building permits granted for other activities in the vicinity of project sites (primarily for residential development), although on-going salmon/habitat recovery projects within the Grande Ronde Model Watershed Program in Union County may potentially result in cumulative benefits to listed species and their habitats. Similarly, projects in Wallow County to rehabilitate a poorly functioning dam at Wallow Lake, recover salmonids under the Wallow County/NPT Salmon Habitat Recovery and Multi-Species Strategy, and various watershed action plans are anticipated to have beneficial, cumulative impacts on listed species and critical habitats which would be enhanced by the Proposed Action.

018-04

See Final EIS (Sections 1.6 and 2.3) for clarification of how NATURES criteria are incorporated into the Proposed Action (and criteria conformance with the recommendations in NOAA's Conceptual Framework for Conservation Hatchery Strategies for Pacific Salmonids).

018-05

As discussed in Section 2.2 of the Final EIS, phase out of the hatchery facilities is not reasonably foreseeable. It is anticipated that spring/summer chinook would be collected yearly for approximately 20 to 25 years, or until adult replacement rates for the naturally spawned population suggest that the population is naturally sustainable (Ashe et al. 2000). The expected duration of the hatchery program would be dependent on changes outside of hatchery operations (i.e., the hatchery program may operate over a longer period of time if other factors limiting population recovery are not mitigated or otherwise controlled, or the hatchery program may operate over a shorter period of time if other limiting factors are reduced). In either case, analysis of hatchery removal would be a programmatic decision, depending on the success of the overall recovery effort, of which the Proposed Action is a component.

Overall production program success is a pre-existing goal under the Lower Snake River Compensation Plan and the conservation/recovery objectives of the ESA permitting program. Project-specific performance standards were developed by project co-managers and reviewed by the Independent Scientific Review Panel (ISRP) and finalized as the Monitoring and Evaluation Plan for Northeast Oregon Hatchery Imnaha and Grande Ronde Subbasin Spring Chinook Salmon (Hesse and Harbeck 2004). The ISRP completed its review of this plan on May 18, 2004 and responded "...that this document is an excellent working draft of a stand-alone M&E Plan for the NEOH hatchery Imnaha and Grande Ronde subbasin spring chinook salmon program." The ISRP also further complimented the authors "...for being among the first to bring the modern EMAP [Environmental Monitoring and Assessment Program] probabilistic sampling procedures into the Columbia Basin." Monitoring and evaluation elements of this plan would be applied to the proposed project and are incorporated into the Final EIS and Biological Assessment by reference.

018-06

The Nez Perce Tribe and the Confederated Tribes of the Umatilla Indian Reservation, along with the ODFW, are the co-managers of the fisheries resources in Northeast Oregon. Efforts to date have been primarily technical with fisheries staff from both Tribes elevating higher-level decisions to tribal leadership (Grassel 2004, personal communication). As part of the next round of project review (Step 2 submittal), the Northwest Power and Conservation Council has asked the co-managers to submit concurrence letters, which the Tribes have agreed to do (Zimmerman 2004, personnel communication). BPA is responsible for assuring compliance with Executive Order 13175, and text was added to the Final EIS (Section 2.4) to more clearly explain this. BPA has been consulting with the tribes in an on-going, iterative fashion from the beginning of the project and, therefore, has been fully consistent with Executive Order 13175.

Mary Kay Howey
64989 Lostine Riv. Rd.
Lostine, OR 97857

JUL 28 2003

Petition to Move Lostine River Fish Hatchery

We the undersigned believe that the proposed fish hatchery on the Lostine River should be moved to the west side of the river rather than keep it on the east side as it is now proposed.

The residents that live along Grainger Road and on the Lostine River Rd. would be negatively impacted by traffic and noise, and if the hatchery were established on the West side of the river this impact would be greatly deminished as there are fewer residents on that side. The west side is ideal for the purposes of a hatchery, whereas the east side is not.

019-01

Signature	Address	Phone
John J. Under First	64870	569-2384
Judy B. Dulin	64870 7th St ^o PO Box 145	569-2384
Wendy M. Coertzen	64801 Mangan Rd	569-2482
Mary J. White	65028 Grainger Rd	569-2405
Sharon Coertzen	64801 Mangan Rd	569-2482
Cindy Ellis	65028 Grainger Rd	569-2405
Thomas Ellis	65028 Grainger Rd	569-2405
Mary T. Howard	64859 Grainger Rd	541-569-2494
Don Jones	64860 Grainger Rd	541-564-9840
Don Jones	64869 Grainger Rd	541-564-9840
Mary K. Bundy	65049 Leaning Tree Rd	541-569-2236
Lee H. Bundy		
Barbara Halverson	64910 2nd St.	541-569-2457
Keith Shuman	64732 Lostine River Rd Box 96	
Alden Shuman	64732 Lostine River Rd Box 96	
Lowell D. Armer	64422 Tim Rd	
Don Armer	64422 Sycamore Rd	569-2428
Marshall Cherry	64616 Lostine River Rd	569-2257

JUL 28 2003

Signature	Address	Phone
Randy & Cheryl	6446 Lostine River Rd, Lostine, OR	569-7857
Chris Seyer	64705 Lostine River Rd	569-5190
Christina Seyer	64705 Lostine River Rd.	569-5190
Michael J. McLean	65080 Lostine River Rd	569-2235
Jan E. Hoffman	65080 Lostine River Rd PO Box 63	569-2235
Mary Kay Starnes	64989 L.R.R. 97857	569-2245
Cory Norton	65048 Lostine River Rd	569-2004
Ralph Simms	65048 Lostine River Rd	569-2004
Bill Wilton	65048 Lostine River Rd.	969-7390
Betsy Williams	65048 Lostine River Rd	969-7396
Loraine J. CUMMAN	LOSTINE	
Dr. F. B. Bache	Lostine River Rd	503-709-5466
Sharon Weiskopf	Lostine River Rd	569-5156
Sharon Weiskopf	" " "	" "
Paul Rott	Tamarack Road	
Carrie Widen	Tamarack Road	
Randy Le Vanem	Tamarack Road Lostine, Or.	569-2040
Shelley Vanem	Tamarack Road - Lostine	569-2040
Dora Cross	Tamarack Road - Lostine	569-2040
George Oja	64191 Tamarack Rd, Lostine	
John Smith	Lostine River Rd	Cell (503) 709-5466
Paul Cook	64443 Lostine River Rd	569-2484
Beit Cook	64443 Lostine River Rd	569-2484
Muriel Jones	P.O. Box 84 7685 Highway 22 Lostine, Or. Or.	569-2479
Larry Jones		

JUL 28 2003

Petition to Move Lostine River Fish Hatchery

We the undersigned believe that the proposed fish hatchery on the Lostine River should be moved to the west side of the river rather than keep it on the east side as it is now proposed.

The residents that live along Grainger Road and on the Lostine River Rd. would be negatively impacted by traffic and noise, and if the hatchery were established on the West side of the river this impact would be greatly deminished as there are fewer residents on that side. The west side is ideal for the purposes of a hatchery, whereas the east side is not.

Signature	Address	Phone
-----------	---------	-------

<i>Donna Loeck</i>	64855 Grainger Rd	569-2300
<i>Ann Constant</i>	64446 Lostine R Rd	569-2014
<i>Philly Constant</i>	64446 Lostine RRd	569-2014

WITH THE EXCEPTION OF THREE PARTIES ALL PERSONS CONTACTED SIGNED THIS PETITION.

CC: WASHINGTON COUNTY PLANNING DEPT
NEZ PERCE TRIBE, SHAWN GRASSEL
BONNEYVILLE POWER ADMIN, MICKY CARTER
NEPA, CAROL BERGSTRON, DIRECTOR

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