final wild and scenic river study report and environmental statement february 1980



IDAHO/WASHINGTON/OREGON

As the Nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interests of all our people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U. S. Administration.



U. S. DEPARTMENT OF THE INTERIOR Cecil D. Andrus, Secretary

National Park Service William J. Whalen, Director

final wild and scenic river study report 9190-353 and environmental statement february 1980

SNAKE RIVER

IDAHO/WASHINGTON/OREGON

SUMMARY

() Draft (X) Final Environmental Statement

Department of the Interior, National Park Service

1. Type of Action: () Administrative (X) Legislative

2. Brief Description of Action:

The Snake Wild and Scenic River Study was conducted pursuant to the Wild and Scenic Rivers Act, as amended. The study recommends Federal and State/County actions to add a 33-mile segment of the Snake River bordering the States of Washington, Idaho, and Oregon to the National Wild and Scenic Rivers System. The report is a combination study report and environmental statement.

3. Summary of Environmental Impact and Adverse Environmental Effects:

Addition to the National System would serve to protect the existing river environment and assure a continuing high quality recreation experience. In accomplishing this, dams and other developments which would have an adverse effect on the natural river environment and quality of recreation experience would not be permitted.

- Alternatives Considered:
 - 1. None of the 33 miles added to National System.
 - 2. Upstream 11 miles added to National System.
 - 3. Upstream 4 miles added to National System.

5. Comments were requested from the following:

Federal_Agencies:

Advisory Council on Historic	Department of the Interior
Preservation	Bureau of Indian Affairs
Department of Agriculture	Bureau of Land Management
Department of Commerce	Bureau of Mines
Department of Defense	Water and Power Resources Service
Corps of Engineers	Fish and Wildlife Service
Department of Health, Education,	Geological Survey
and Welfare	Heritage Conservation and
Department of Housing and Urban	Recreation Service
Development	Environmental Protection Agency

Department of Transportation Department of Energy Bonneville Power Administration Pacific Northwest River Basins Commission Federal Energy Regulatory Commission Clearinghouses: States of Idaho, Oregon, and Washington Others: American Camping Association, Inc. National Farmers Union American Canoe Association, Inc. National Wildlife Federation American Conservation Association, Northwest Mining Association Inc. The National Grange American Farm Bureau Federation National Audubon Society American Mining Congress Local and State Cattleman American Scenic and Historic Associations Preservation Society Sierra Club Ducks Unlimited, Inc. Sport Fishing Institute Washington Water Power Company Federation of Western Outdoor Clubs. Western River Guides Association Friends of the Earth The Wilderness Society Idaho Power Company Hells Canyon Preservation Interagency Whitewater Committee Council Izaak Walton League of America

6. Date Made Available to CEQ and the Public:

Draft statement: June 20, 1979 Final statement:

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INTRODUCTION

In 1968, the Wild and Scenic Rivers Act, Public Law 90-542, was enacted by the Congress and signed into law by the President. The Act declared that the established national policy of water resources development should be complemented by a policy that would preserve selected rivers or sections of rivers possessing outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values in their free-flowing condition for the benefit and enjoyment of present and future generations,

The Act established the National Wild and Scenic Rivers System, designated eight rivers as the initial components of the system, identified 27 rivers for study as potential additions to the system, and prescribed methods and standards by which additional rivers could be included in the future. Subsequent actions by the Congress and by the Secretary of the Interior have increased the number of rivers in the system to 28. In addition, amendments to the Act have increased to 75 the number of rivers authorized for study.

Public Law 94-199, enacted in 1975, established the Hells Canyon National Recreation Area in the States of Oregon and Idaho encompassing a 71-mile-long portion of Hells Canyon extending from Hells Canyon Dam, downstream (north) to the Oregon-Washington state line. The Act also amended the Wild and Scenic Rivers Act by designating the 67-mile segment of the Snake River extending from Hells Canyon Dam downstream to the northern boundary of the Wallowa-Whitman National Forest as a unit in the National Wild and Scenic Rivers System. It further amended the Wild and Scenic Rivers Act by authorizing the 33-mile segment of the Snake River downstream to the town of Asotin, Washington, for study as a potential addition to the National System. (See Map 1.) In a letter dated March 24, 1976, the Forest Service requested the Bureau of Outdoor Recreation to conduct the study. Subsequently, in February 1978, study responsibility was transferred to the National Park Service.

In evaluating the 33-mile segment of the Snake, requirements of three major documents were complied with. The Wild and Scenic Rivers Act requires the preparation of a report by the Secretary of the Interior, or the Secretary of Agriculture where national forests are involved, and its submission by the President to the Congress. The report shall evaluate the suitability or nonsuitability of the river for addition to the National Wild and Scenic Rivers System and describe the characteristics which do or do not make the area a worthy addition to the system. In addition, the report shall show the current status of land ownership and use in the area; the reasonable foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed if the river were included in the system; the method of administration; and costs.



Hells Canyon



The National Environmental Policy Act of 1969 (NEPA) requires the study of all actions which may significantly affect the quality of the human environment. The results are contained in a report which provides agencies, other decision-makers, and the public with:

1. The environmental impact of the proposed action.

2. Any adverse effects which cannot be avoided should the pro $_{\overline{\mathbf{v}}}$ posal be implemented.

3. Alternatives to the proposed action.

4. The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity.

Any irreversible and irretrivable commitments of resources which would be involved in the proposed action should it be implemented.

Principles and Standards for Planning Water and Related Land Resources, adopted by the Water Resources Council in 1973, prescribes a systematic method of economic, environmental, and social objectives and accounts to use in evaluating the various feasible alternative management plans and selecting the plan which makes best use of the resource while meeting the needs of society in a manner acceptable to the public. Studies conducted pursuant to the Wild and Scenic Rivers Act are directed at identifying river environments which have outstandingly remarkable scenic, recreational, and related values, and determining how best to protect those rivers under authority or the Wild and Scenic Rivers Act. Such protection may not necessarily result in the maximum economic development. However, the economic benefits that would be foregone by protecting environmental and other values of the river are displayed in such a way as to facilitate the evaluation of tradeoffs. (See Table 10.)

Under <u>Principles and Standards</u>, as with the NEPA process, special efforts are made during a study to involve the various public and private interests having a direct involvement in the river. This is accomplished by establishing a multi-disciplinary study team with representation from each affected Federal and State agency, local governments, and private organizations. It also is accomplished through the active participation of the public at large, both persons who reside near the study area and persons who live farther away but utilize the study area in one way or another.

The organization of the Snake Wild and Scenic River Study and the steps taken in carrying it out and involving the public are summarized in Chapter IX. The study of the 33-mile segment has been a cooperative effort with the States of Idaho, Washington, and Oregon, and has included both public and private involvement, as described in Chapter IX. The field evaluation was carried out by a study team under the



auspices of first the Bureau of Outdoor Recreation and then the National Park Service.

-

I. DESCRIPTION OF THE PROPOSED ACTION

A. Findings

Criteria

The first basic task in conducting a wild and scenic river study is to determine whether the study segment meets the eligibility criteria as set forth in the Wild and Scenic Rivers Act and in the "Guidelines for Evaluating Wild, Scenic, and Recreation River Areas Proposed for Inclusion in the National Wild and Scenic Rivers System under Section 2, Public Law 90-542," adopted by the Secretaries of the Interior and Agriculture. If the river segment is found to meet the criteria, then the study continues in a manner similar to the steps outlined in Chapter IX of this report. If the study segment does not meet the criteria, then a negative report is prepared for submission to Congress.

The five criteria are that a river must:

1. Possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values.

2. Be long enough to provide a meaningful recreation experience.

Be substantially free flowing.

4. Normally contain a sufficient volume of water during the recreation season to provide full enjoyment of water-related outdoor recreation.

5. Have high water quality, or be restorable to that condition.

The conclusion of the study is that the entire 33-mile northerly flowing study segment, as defined on Map 2, meets the criteria.

The study segment was found to have many outstanding qualities:

It is free flowing and has high water quality.

The river provides excellent opportunities for float and power boating.

Resident populations of rainbow trout, smallmouth bass, channel catfish, and sturgeon, and migrant salmon and steelhead provide excellent sport fishing.

Scenic values along the 11 miles of river upstream from the Grande Ronde are comparable to those within the Hells Canyon National Recreation Area, located immediately upstream. Below that point, the valley broadens somewhat and, while not as spectacular, its scenic quality is still outstanding. Numerous sandy beaches provide opportunities for swimming, sunbathing, picnicking, and camping, and are presently used extensively for outdoor recreation.

The study area is rich in archeological values with some sites dating back 8,000 years. These sites include campsites, burial grounds, pictographs, petroglyphs, and ceremonial grounds relating to the Nez Perce Indians and other Indian cultures.

Many species of wildlife inhabit the canyon including river otter, elk mountain sheep, deer, mountain lion, golden eagle, Hungarian and chukar partridge, grouse, and quail.

The canyon provides critical winter range for deer and other species of wildlife.

Picturesque livestock ranches and remnants of historic mining operations are located along the river.

Excellent upland bird and good mule deer hunting exist.

Classification

The second principal finding relates to classification of the river. The Wild and Scenic Rivers Act provides that rivers shall be classified as either Wild, Scenic, or Recreational at the time they are added to the National System. The three classes are defined in the Act as follows:

- 1. <u>Wild River Areas</u> Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and water unpolluted.
- Scenic River Areas Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.
- 3. <u>Recreational River Areas</u> Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

The consensus of the study is that the 11 miles upstream from the confluence of the Grande Ronde with the Snake qualify to be classified Scenic, while the 22 miles downstream qualify to be classified Recreational. The study segment logically is divided at the Grande Ronde. Upstream from the Grande Ronde, the river is narrow and swift. The canyon is deeply incised and undeveloped except for a few vacation homes and ranching operations. That reach is the lower end of the spectacular Hells Canyon. Downstream from the Grande Ronde, the river and canyon broaden out, the canyon sides rise more gradually to less imposing heights, the river gradient is less steep, and the adjoining lands are more developed, especially on the Washington side where a county road parallels the river and much of the land is in agricultural use.

The nature of recreational use also divides at the Grande Ronde. Upstream, most use is limited to jet boaters out of the Lewiston-Clarkston area and to float boaters descending from access points located upstream. Downstream from the Grande Ronde, recreational use is much heavier because of the close proximity to population centers and the ease of bank fishing, swimming, inner-tubing, water skiing, picnicking, and boating. The marinas at Clarkston and Lewiston also contribute to heavy boat use along this segment of the river. Local residents make major use of the portion downstream from the Grande Ronde, especially during summer weekends and holidays. Existing facilities and parking are limited and overused.

B. Proposed Action

Four different possibilities for the future management and use of the northerly flowing 33-mile study segment are considered in this report. The pros and cons of the recommended plan are discussed in this section and in Chapters III through VII. The three alternative possibilities are discussed in Chapter VIII. Each of the four plans are displayed in Table 10. Under the proposed action, the entire 33 miles would be added to the National Wild and Scenic Rivers System. Under Alternative 1, none of the 33 miles would be added. Under Alternative 2, only the upper 11 miles--the portion upstream from the Grande Ronde-would be added. Under Alternative 3, only the uppermost 4 miles--the portion already within the Hells Canyon National Recreation Area--would be added.

Only under the proposed action plan is there assurance that the river environment and quality of recreation experience will be protected along the entire 33 miles found to meet the criteria.

Administration

It is recommended that Congress add the upper 11-mile river segment between the Grande Ronde and the Wallowa-Whitman National Forest boundary (see Map 2) to the National Wild and Scenic Rivers System under Forest Service administration. The 11 miles would be added to the 67 miles upstream that are already in the National Wild and Scenic Rivers System and administered by the Forest Service, consolidating its administration of all of the Hells Canyon portion of the Snake from Hells Canyon Dam to the Grande Ronde.



It is recommended that the States of Idaho and Washington and/or Asotin and Nez Perce Counties be given the opportunity to assess their possible interests in administering the remaining study segment extending 22 miles downstream from the Grande Ronde. The States and Counties have indicated that they may prefer this arrangement. The States of Washington and Idaho are actively seeking to develop a workable joint management program for the lower 22 miles which will provide more locally acceptable land use controls than would be possible with Federal administration. Asotin and Nez Perce Counties, too, are jointly exploring ways of providing the needed additional protection by strengthening local zoning ordinances. The possibility of some form of cooperative State/County plan is also being pursued.

Administration of the 22 miles would be in accordance with a cooperative management plan, prepared by the two states and/or counties and found acceptable by the Secretary of the Interior, which would serve to protect the scenic and recreational qualities of the river corridor. The Governors of Washington and Idaho need apply to the Secretary of the Interior to have the 22 miles added to the National System as provided for under Section 2(a)(ii) of the Wild and Scenic Rivers Act.

The applications from the Governors would need to:

(1) State that the 22-mile segment has been designated a recreational river by or pursuant to an Act of the State Legislature.

(2) Disclose the plans of the states and/or counties to manage and protect the scenic and recreational qualities of the river for public use and enjoyment, and the steps that have already been taken by the states and/or counties toward that objective.

Unless acceptable applications have been submitted by the two Governors to the Secretary of the Interior by the time Congress is ready to enact legislation adding the upper 11 miles to the National System, it is recommended that Congress add the entire 33 miles to the National System under Forest Service administration.

Boundaries

Upon inclusion of the river segment in the National System, the Forest Service and/or states/counties, in conjunction with their preparation of a comprehensive management plan, would establish detailed boundaries.

The lateral boundaries along the 11 miles upstream from the Grande Ronde would generally be determined in a manner consistent with the Forest Service boundaries along the 67 miles already included in the National System. The boundaries would include the visual foreground and extend back from the river an average of one-quarter mile. So as



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to provide a more efficient unified management, BLM lands adjoining the segment should be transferred to Forest Service administration.

Lateral boundaries along the 22 miles downstream would extend in most places on the Washington side to the county road that parallels the river. Much of the road lies immediately beneath hillsides which are too steep for development. Where the road is adjacent to the river and the lands beyond are privately owned and developable, then the boundary may need to extend beyond the road a modest distance so that easements can be acquired which will limit development. If it appears that most use of the existing county road will be generated as a result of the river being designated, then the boundaries should be drawn to encompass the road so that responsibility for road improvements and maintenance will rest with the managing agency. On the Idaho side, the boundary should include the visual foreground. The distance back from the mean high water line on each side of the river would average one-eighth mile.

Management Objectives

In broad terms, the management objectives would seek to protect the natural riparian river environment, associated scenic and recreational values, and water quality in their existing conditions. First priority would be to protect the river environment by controlling the kinds and extent of possible developments on the lands adjoining the river. Where necessary, development rights on privately owned lands in the form of scenic easements would be acquired. Another possibility where the states and/or counties have administrative responsibility would be some form of perpetual zoning which meets standards the Secretary of the Interior determines are necessary to protect the river environment.

Subdivision and development of recreation homesites are occurring upstream from the Grande Ronde on the Idaho side of the river and downstream from the Grande Ronde on the Washington side of the river. Seventy-one percent of the lands fronting the river downstream from the National Recreation Area are in private ownership.

Another priority consideration is the maintenance of a quality recreation experience along the river. The recreational carrying capacity of both the upper 11 miles and the lower 22 miles would be evaluated by the administering agency or agencies and management plans formulated as a basis for managing public use. Along the lower 22 miles, those plans would guide the location and development of public access, parking areas, and recreation facilities to insure proper control of public use, to minimize environmental impacts, and to protect water quality. Along the upper 11 miles, public access would be available only by boat or foot. Public use would be carefully monitored to insure that carrying capacity is not exceeded. Special attention would be given by the Forest Service and states/ counties to locating, evaluating, and protecting the various archeological and historical sites located within the boundaries. Most of the 33 miles was surveyed by a team of archeologists from Washington State University in 1964 in connection with the proposed Asotin Dam under study then by the Corps of Engineers. The team identified a large number of significant archeological sites. As a result, both sides of the river are included on the National Register of Historic Places as the Snake River Archeological District. If the 33 miles are added to the National Wild and Scenic Rivers System as this report recommends, the area would continue to be protected in accordance with the requirements of the Advisory Council on Historic Preservation (36 CFR 800).

The States of Oregon, Idaho, and Washington would continue to manage the fish and wildlife resources in and along the river, as at present. Opportunities for deer, quail, chukar partridge, and waterfowl hunting are available, as are opportunities to fish for resident and anadromous species of fish.

During normal years, the flow of the river in the study segment is adequate for recreational uses. Under the terms of the Federal Energy Regulatory Commission's license for Hells Canvon Dam, river flows must be maintained at a minimum of 5,000 cubic feet per second (c.f.s.) at Hells Canyon Dam and 13,000 c.f.s. downstream at Lime Point. Section 6 of Public Law 94-199 creating the Hells Canyon NRA provides that no provision of the Wild and Scenic Rivers Act shall in any way limit, restrict, or conflict with present and future use of the waters of the Snake and that no additional flow requirements of any kind may be imposed below Hells Canyon Dam for Wild and Scenic River purposes. No change is recommended in the protection afforded under P. L. 94-199 to upstream water users.

Costs of Acquisition, Development, and Operation

The following cost figures are tentative and are designed to provide for current recreation use levels based on the assumption that current levels are at or near the area's recreation carrying capacity.

Along the 11 miles upstream from the Grande Ronde, most of the lands adjoining the river are privately owned. However, since the 4 miles between the National Forest boundary and the Oregon-Washington state line are already within the boundaries of the Hells Canyon NRA, although not designated as part of the Wild and Scenic Rivers System, only 7 miles of river would involve land acquisition not already authorized as part of the Hells Canyon NRA. Included along the 7 miles are 1,568 acres in private ownership within 1/4 mile of the river. Scenic easements on 1,560 acres and fee acquisition of 8 acres would be acquired at an estimated 1979 cost of \$1,351,200. Land values along the Idaho side were estimated in 1979 to average \$900 per acre for fee purchase and \$800 per acre for a scenic easement. Along the Washington side, the averages were \$1,100 per acre for fee purchase and \$1,000 per acre for scenic easements.

Facilities are needed along the 7 miles to provide for public use and to protect the river environment, including water quality. Seven primitive campsites with associated fire rings and sanitary facilities are recommended. In addition, an administrative site located near the mouth of the Grande Ronde and large enough to accommodate two management personnel is recommended. The 1979 cost of those developments and related equipment is estimated to be \$150,000. Approximately 8 acres would be needed for the administrative site.

Annual operating and maintenance costs for the 7-mile portion are estimated to be \$30,000 and include one work-year for patrol, litter cleanup, and servicing of recreation facilities. Personnel stationed at the administrative site would also monitor the number of parties headed upstream in boats as a means of helping to balance recreation use with recreation carrying capacity.

The costs outlined above are summarized as follows:

Table 1. Estimated Costs (1979 Dollars) for the 7 miles from the NRA Boundary Downstream to the Grande Ronde

	<u>Total Cost</u>
Acquisition	\$1,351,200
Development	150,000
Total	\$1,501,200
Annual Operation and Maintenance	30,000

Along the 22 miles of river extending downstream from the Grande Ronde, there are approximately 2,512 acres of privately owned lands within one-eighth mile of the river. The acquisition of fee interest in 100 acres and scenic easements on the balance of 2,412 would cost an estimated \$1,856,800. Fee acquisition is estimated to average \$700 per acre on the Idaho side and \$1,400 per acre on the Washington side; easements average \$600 per acre in Idaho and \$800 per acre in Washington (1979 dollars).

A number of public use facilities are needed along the lower 22 miles. At the present time, there is one small parking area and boat launching ramp located a short distance below the Grande Ronde on the Washington side of the river. Two additional small parking areas are proposed to be located downstream on the Washington side at about 5-mile intervals. Each parking area would accommodate approximately 25 automobiles and be equipped with a comfort station. Parking space is urgently needed in order to relieve the congestion along the county road which now occurs during the heavy use summer season, especially on weekends and holidays. That road becomes virtually impassable at times because of parked cars. At the present time, river users have no alternative but to park along the road. After additional parking is provided, it is recommended that the road be patrolled as necessary to enforce utilization of the space provided for parking in place of parking along the sides of the county road.

Several picnic sites accessible only by boat have been provided by Nez Perce County on or near sand bars along the Idaho side of the river. An additional nine picnic sites and associated sanitary facilities would be provided along the river, three boat-in sites on the Idaho side and six accessible by car on the Washington side. Sanitary facilities in particular are needed. The estimated cost of those facilities is \$200,000.

Annual operating and maintenance costs for the lower 22-mile segment are estimated to total \$80,000, including 2 work-years for patrol and other management functions.

A summary of costs (1979 dollars) for the lower 22-mile segment is found in Table 2.

		Total Cost	
	Idaho Side	Washington Side	Total
Acquisition	\$638,400	\$1,218,400	\$1,856,800
Development	20,000	180,000	200,000
Total	\$658,400	\$1,398,400	\$2,056,800
Annual Operation	n e \$30.000	\$50,000	\$80,000

Table 2.Estimated Costs (1979 Dollars) for the 22 miles from the
Grande Ronde Downstream to Asotin

The combined costs for both the 7-mile and 22-mile segments are summarized in the following Table 3.

Table 3. Estimated Costs (1979 Dollars) for the 29 miles from the NRA Boundary Downstream to Asotin

	<u>Total Cost</u>
Acquisition	\$3,208,000
Development	350,000
Total	\$3,558,000
Annual Operation and Maintenance	\$110,000

C. Interrelationship With Ongoing Programs

U. S. Forest Service

In 1975, Congress directed the Secretary of Agriculture, through the Forest Service, to preserve the natural beauty and historical and archeological areas and to enhance the recreation and ecological values and public enjoyment of 662,000 acres of land bracketing a 71-mile segment of the Snake River. Designated as the Hells Canvon National Recreation Area, it includes 194,000 acres of wilderness, with an additional 110,000 acres designated for wilderness study. See Map 3. Congress also designated a 67-mile segment of the Snake River, from Hells Canyon Dam downstream to the National Forest boundary, and the 24-mile long Rapid River, a tributary to the Little Salmon River, as components of the National Wild and Scenic Rivers System. The Secretary of Agriculture has been directed to develop a comprehensive management plan for the Hells Canvon NRA and the two Wild and Scenic rivers and submit it to Congress by 1980. Additional provisions estab-lished guidelines under which the area is to be managed, set out certain limitations relating to land acquisition, and authorized the appropriation of funds for land acquisition and development, as well as for the preservation and interpretation of the historical and artcheological features within the area. The Hells Canyon National Rec-reation Area, which includes lands of three national forests, is presently the focus of a planning study by a special Forest Service team based in Baker, Oregon.

Environmental Protection Agency

The Environmental Protection Agency (EPA) administers the Federal Water Pollution Control Act, as amended. One program under the Act (Section 208) requires each state to prepare a plan which identifies sources of pollution, determines priorities in taking steps to abate that pollution, and formulates methods of local implementation and control. EPA has been working closely with the States of Washington, Oregon, and Idaho in the preparation of their state plans. A major part of the



state 208 plans for the counties which encompass the Snake River basin deals with controlling water pollution by improving agricultural practices. The hoped-for result will be to obtain improved water quality by reducing sediment, nitrogen, phosphorus, and pesticide concentrations.

It is impossible at this time to quantify the expected water quality improvement in the Snake River study corridor. Since those 208 plans call for voluntary implementation and rely on multi-agency cooperation, redirection of existing resources, and individual farmer initiative, the degree of agricultural pollution reduction cannot be predicted. Also, from a strictly technical point of view, the actual percentage reduction of pollutants resulting from the recommended agricultural improvement has not been determined; therefore, the ambient water quality improvement in the study corridor has yet to be calculated.

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC), formerly the Federal Power Commission, in licensing the construction of Hells Canyon Dam by the Idaho Power Company, established certain flow requirements for the dam. Those requirements are that:

the project shall be operated in the interest of navigation to maintain 13,000 c.f.s. flow in the Snake River at Lime Point (river mile 172) a minimum of 95 percent of the time, when determined by the Chief of Engineers to be necessary for navigation. Regulated flows of less than 13,000 c.f.s. will be limited to the months of July, August, and September, during which time operation of the project would be in the best interest of power and navigation, as mutually agreed to by the licensee and the Corps of Engineers. The minimum flows during the periods of low flow or normal minimal plan operations will be 5,000 c.f.s. at Johnsons Bar, at which point the maximum variation in river stage will not exceed 1 foot per hour.

Corps of Engineers

The Corps of Engineers was authorized by the River and Harbors Acts of 1902 and 1935 to maintain a navigation channel from Lewiston to Johnsons Bar (91 miles). Under that program, the Corps has expended \$170,000 in the construction of deflection groins, rock removal from the navigation channel, and maintenance of the centerline channel marker.

The river reach of the study area is included in the category of a navigable water of the United States; it is administratively put in that category by the Corps because of the historic, present, and future use in commercial navigation. The Walla Walla District Engineer administers the permit authority for any river-oriented work under Section 10 of the River and Harbors Act of 1899, and for the disposal of dredged material or fill in the waterway under Section 404 of the 1977 Clean Water Act.

Bureau of Land Management

The Bureau of Land Management District Offices in Baker, Oregon, and Coeur d'Alene, Idaho, have developed management framework plans for their lands along the study segment. Those lands include 7.4 miles of frontage downstream from the National Recreation Area. The plans recognize the high value of riverfront lands for use by hunters, fishermen, campers, and others.

U. S. Geological Survey

The Geological Survey has operated a streamflow gauging station at river mile 167.2 since 1958. Hydrologic data collected at the site provides essential information for operation of the Lower Granite Project of the Corps of Engineers. Operation of the gauging station will continue regardless of the alternative selected.

Bonneville Power Administration (BPA)

BPA has no existing lines or plans in the immediate future for transmission line corridors in the study area. However, long-range studies have identified certain transmission corridors which may become critical to move energy from Montana coal fields to load centers in the Pacific Northwest. One of the potential corridors crosses the downstream one-third of the study area.

U. S. Coast Guard

The U. S. Coast Guard has responsibility for boat safety on the river in conjunction with the States of Oregon, Idaho, and Washington.

State Comprehensive Outdoor Recreation Plans

Oregon's Comprehensive Outdoor Recreation Plan recognizes that providing additional recreation areas and facilities along the State's rivers should continue to be of high priority. The plan further recognizes the recommendation of the Columbia-North Pacific Type 1 study which states that selected portions of free-flowing Oregon rivers should be set aside in their present condition for future generations. The recommended list includes the Snake River.

Idaho's Comprehensive Outdoor Recreation Plan states that there is a need to expedite the Federal Wild and Scenic Rivers program. It further states that such action is necessary due to rapidly increasing

pressures for incompatible developments which, if permitted, would eliminate such resources from a wild classification.

Washington's Comprehensive Outdoor Recreation Plan recommends the establishment of a State system of wild, scenic, and recreational rivers to complement the National Wild and Scenic Rivers Act.

State River Programs

Both Oregon and Washington now have State river preservation systems. Oregon's was initiated in 1956 and includes seven rivers or segments of rivers. Washington's was established in 1977 and, as yet, contains only a single river system. Neither state system includes the Snake River study segment.

Oregon's Scenic Waterways System was enacted following a referendum. Rivers may be added by designation of the Governor and concurrence of the State Legislature. Under the Oregon Scenic Waterways System, any development or changes of use on non-Federal lands within a quarter mile of the river are regulated. Plans for construction, tree-cutting, prospecting, mining, or other changes of land use must be submitted to the State Scenic Waterways Coordinator. If the State determines that a proposal would substantially impair the natural and scenic beauty of the waterway, the landowner may not proceed for 1 year. During that period, the State may negotiate modification of the unacceptable plan, or if this is not possible, acquire the land involved, by condemnation if necessary. If the State does not acquire the land within the year, the landowner may proceed with his plan.

Washington's system specifies protection of the visual corridor along publicly owned or leased lands fronting on the river. There is authority to acquire additional lands in order to protect the river, but eminent domain may not be utilized.

The State of Idaho does not have a natural rivers system. However, a State Water Plan adopted by the State Water Board in 1977 and endorsed by the State Legislature in 1978 recommends establishment of such a system and lists the Snake for inclusion.

Bureau of Indian Affairs

Location of the study area is within the 1855 Nez Perce treaty ceded area. Article 3, second paragraph of that treaty, which pertains to hunting and fishing rights, states:

"The exclusive right of taking fish in all the streams where running through or bordering said reservation is further secured to said Indians, as also the right of taking fish at all usual and accustomed places in common with citizens of the Territory; and of erecting temporary buildings for curing, together with the privilege of hunting, gathering roots and berries, and pasturing their horses and cattle upon open and unclaimed land."

These rights continue to exist and must be considered in management of the Hells Canyon area.
II. DESCRIPTION OF THE ENVIRONMENT

A. <u>Regional Setting</u>

Physiography

The 33-mile long study segment is located south of the wheat-producing Palouse Hills of Washington and Idaho, northwest of the Seven Devils region of Idaho, and east of the Wallowa and Blue Mountains of Oregon and Washington. The river flows in a northerly direction and serves as the boundary between Idaho on the east and Oregon and Washington on the west. Oregon fronts the river along 4 miles, Washington 29 miles, and Idaho the entire 33 miles. Immediately upstream (south) is the Hells Canyon National Recreation Area administered by the Forest Service. It embraces most of the Hells Canyon section of the Snake and extends from the Washington-Oregon state line upstream 71 miles to Hells Canyon Dam. Immediately downstream (north) is the town of Asotin, Washington, the lower terminus of the study segment. Six miles farther downstream are the towns of Clarkston, Washington, and Lewiston, Idaho, located at the junction of the Snake and Clearwater Rivers. Lower Granite Dam, completed by the Corps of Engineers in 1975, backs up water for 39 miles on the Snake River and extends to a maximum pool approximately one-half mile upstream from the town of Asotin.

The Cascade Mountains to the west form a barrier to moist air moving eastward from the Pacific Ocean, but the study area is still in the belt of prevailing westerlies, so it tends to be dry. The Selkirk and Rocky Mountains to the north and east provide protection from the more severe winter storms that move southward from Canada. However, polar outbreaks of cold air occasionally spill over those barriers resulting in short periods of very low temperatures.

The temperature extremes have been 112° F in summer and -18° F in winter. Those temperatures were recorded at Clarkston, Washington, but are fairly representative of temperature extremes encountered throughout the region.

Precipitation averages about 13 inches a year and is rather evenly distributed with slightly higher precipitation in May and June and lower in July and August. In spring and summer, precipitation frequently occurs as showers associated with thunderstorm activity. In winter, precipitation occurs either as snow or rain. Six miles north of the study area at Clarkston, snow may accumulate to a depth of 6 inches or more and remain on the ground for periods of several weeks. Upstream, the annual precipitation increases gradually and more occurs as snow.

Population and Economy

Approximately 50,000 people live within the three-county area of Asotin County, Washington; Nez Perce County, Idaho; and Wallowa County, Oregon. Those counties are predominately rural. The largest towns are Lewiston in Nez Perce County with a population of 30,000, Enterprise in Wallowa County with a population of 2,000, and Clarkston and Asotin in Asotin County with a combined population of 7,000.

Timber production and processing, agriculture, and recreation are the three most important industries. However, with completion of Lower Granite Lock and Dam in 1975 and the advent of slack water navigation all the way to the Pacific Ocean, Lewiston and Clarkston became inland ports and distribution centers serving southeastern Washington, northeastern Oregon, and north-central Idaho. Montana, North Dakota, and South Dakota are also served by the Snake River ports for grain shipments.

The nearest major population centers within a radius of 100 miles are Spokane, Walla Walla, and Pullman, Washington; Moscow, Idaho; and LaGrande, Oregon. Boise, Idaho; Missoula, Montana; and Yakima and the Tri-Cities (Pasco, Richland, and Kennewick), Washington, lie within a radius of 200 miles. Seattle and Portland each is about 300 miles distant.

Growth projections for the three-county area are for a slow but steady increase in economic activity as well as population. Those trends are expected to continue during the foreseeable future.

Transportation Facilities

The transportation hub of the region is Lewiston-Clarkston. U. S. 195 and 95 extend south to Lewiston from Spokane and Coeur d'Alene, respectively, and then continue south toward Boise. U. S. 12 extends through Lewiston in an east-west direction between Missoula and Portland. State Route 3 from Enterprise, Oregon, becomes State Route 129 in Washton and terminates at Clarkston. Regularly scheduled jet commercial air service is available at the Lewiston-Clarkston Airport, and there is daily rail and bus service to Lewiston. See Map 4.

Recreation Resources

Within a 100-mile radius of the study area are eight major federally administered recreation areas. See Map 5. These include:

- Hells Canyon National Recreation Area (193,840 acres) overlapping the southern portion of the study area
- Nez Perce National Historic Park (2,114 acres) 16 miles east of Lewiston



- Gospel Hump Wilderness (206,000 acres) 40 miles to the southeast
- Idaho Primitive Area (1,232,744 acres) 100 miles to the southeast
- Salmon River Breaks Primitive Area (216,125 acres) 100 miles to the southeast
- Selway-Bitterroot Wilderness (1,234,659 acres) 70 miles to the east
- Eagle Cap Wilderness (293,775 acres) 50 miles to the southwest
- Whitman Mission National Historic Site (98 acres) 80 miles to the west

In addition, there are numerous Forest Service campgrounds, Corps of Engineers reservoir recreation areas, Bureau of Land Management campgrounds, State parks, and County recreation areas. The Chief Joseph Wildlife Recreation Area of 28,000 acres, administered by Washington State, borders the Snake and Grande Ronde Rivers in the extreme southeast corner of the state.

Within the three states bordering the study segment are seven rivers in the National Wild and Scenic Rivers System:

Middle Fork Clearwater and its Selway and Lochsa tributaries, Idaho - 50 miles east

Middle Fork Salmon, Idaho - 140 miles southeast

Rapid, Idaho - 80 miles southeast

Snake, Idaho and Oregon - immediately upstream

St. Joe, Idaho - 75 miles northeast

Rogue, Oregon - 450 miles southwest

Skagit, Washington - 500 miles northwest

The Illinois River is Oregon, a tributary to the Rogue; the Owhyee River in Idaho and Oregon; and Idaho's main Salmon, Priest, and Bruneau Rivers have been proposed to Congress for addition to the National System.



B. Description of the Study Area

The River Corridor

The South Fork Snake River has its origin in Shoshone Lake, located in Yellowstone National Park. It skirts the Grand Tetons by way of Jackson Hole where it is joined by Henry's Fork below Rexburg, Idaho, to form the Snake. The river meanders westerly across southern Idaho to Weiser, Idaho, where it turns north and enters Hells Canyon. Within the Hells Canyon National Recreation Area, two rivers join the Snake, the Imnaha from the west (12 miles upstream from the study segment) and the Salmon from the east (9 miles upstream from the study segment). Within the study segment, the Grande Ronde joins from the west. Downstream from the study segment 6 miles, the Snake is met at Lewiston, Idaho, by another major tributary, the Clearwater River. The Snake then bends westward into Washington and finally merges with the Columbia River at Pasco, Washington. From source to confluence with the Columbia, the Snake is slightly over 1,000 miles in length. The Grande Ronde is the only major tributary within the study area. (See Map 6.)

Many sections of the Snake River are inundated by reservoirs. Ten miles upstream from its mouth, Ice Harbor Lock and Dam forms Lake Sacajawea. At river mile 42, the head of Lake Sacajawea, is Lower Monumental Lock and Dam. Further upstream at river mile 70 is Little Goose Lock and Dam, and at river mile 107, Lower Granite Lock and Dam. This series of impoundments, together with additional impoundments on the lower Columbia River, provide navigation all the way from the Pa Pacific Ocean to Lewiston and Clarkston. The Snake is also navigable to a limited degree from the Lewiston-Clarkston area to Johnsons Bar, 90 miles upstream.

Upstream from the slack water of Lower Granite Reservoir near Asotin, at river mile 147, the downstream end of the study segment, the Snake is free flowing for 100 miles to Hells Canyon Dam, located near river mile 247. Hells Canyon Dam, constructed in 1966, floods the upper 10 miles of Hells Canyon.

Upstream from Hells Canyon Dam, at river mile 270, is Oxbow Dam, followed by Brownlee Dam at river mile 285, and eight other major dams, the last one being Jackson Lake Dam in Jackson Hole, Wyoming.

The most spectacular portion of Hells Canyon, including 11 miles of the proposal, extends upstream from the Grande Ronde 78 miles to Hells Canyon Dam. The canyon averages 5,500 feet deep. At its deepest point, beneath the great promontory of He Devil Mountain, the canyon is 7,900 feet from rim to river. Flanked on the east by Idaho's Seven Devil Mountains and on the west by Oregon's Wallowa Mountains, it is more than 1,000 feet deeper than the next most entrenched canyon in North America, Arizona's Grand Canyon.



After emerging from Hells Canyon at the Grande Ronde, there is an abrupt change in the character of the Snake. Instead of being deeply entrenched, narrow, and with frequent rapids, the canyon widens, the river broadens, and the current slackens.

The 33-mile-long study segment includes the 11 miles from the northern boundary of the Wallowa-Whitman National Forest downstream to where the Grande Ronde River enters the Snake, and the 22 miles from the Grande Ronde downstream to slack water of the Lower Granite Reservoir located one-half mile above the town of Asotin, Washington.

River Dimensions, Flow, and Water Quality

The river channel varies in width from an average of about 400 feet upstream from the Grande Ronde, to an average of 1,000 feet downstream. Within the study segment, the river descends in elevation from 880 feet above sea level to 740 feet, a drop of 140 feet. The gradient upstream from the Grande Ronde is 6 feet per mile, while being 2.5 feet per mile from the Grande Ronde to the town of Asotin, for an average of 4 feet per mile throughout the study segment.

During normal years, river flows through the study segment range from 17,000 c.f.s. in the late summer to 80,000 c.f.s. during spring highs. Abnormal weather conditions induce flows which have fluctuated between an extreme low of 6,010 c.f.s. in 1958 and extreme high of 195,000 c.f.s. in 1974, as measured by the U.S. Geological Survey. The width, depth, and flow of the river permits the use of most types of motor boats as far upstream as the Grande Ronde. Beyond that point, only jet boats or the more powerful propeller-driven boats are capable of traveling.

Water quality is good. The upriver reservoirs act as a buffer to water returns from upstream irrigation withdrawals. Although the water is not potable, it is rated by the Idaho State Department of Health and Welfare as fully sufficient for primary contact recreational activities and for the support of native acquatic flora and fauna.

Geology and Soils

During the Mesozoic Era, 70 to 230 million years ago, the study segment was part of a great inland sea. Materials deposited into the sea were compressed into limestone, shale, and sandstone. A period of uplift accompanied by granitic intrusion and erosion followed. About 16 million years ago, numerous flows of basalt from deep fissures extruded to cover thousands of square miles of the Columbia Plateau of Washington, Oregon, and Idaho, including the present area of the Snake River canyon. One flow succeeded another until a volcanic strata up to a depth of over 5,000 feet was formed. Since the final major volcanic outburst, erosion dominated by 3,000 feet of downcutting by the Snake River and recent regional uplift of the Blue Mountains anticline have created the present topography. Today, the topography of the study area is characterized by deep canyons cutting through plateaus composed of Columbia River basalt capped with loess soils. (See Map 7.) Sedimentary deposits, as at Lime Point, as well as the granite intrusions, are exposed in places.

Within the canyon upstream from the Grande Ronde, there has been little opportunity for a mantle of soil to form because of the steep terrain. As a result, much of the canyon is still rock faced. Where soils have formed within the side canyons and along the river benches, the soil is typically sandy loam intermixed with river-washed rocks and gravel. (See Map 8.)

Below the Grande Ronde, a mantle of silt loam has formed on the more gently sloping canyon sides and within the flood plain of the river on the Washington side which extends back from the river in places as much as a half-mile. There is no flood plain on the Idaho side, but instead the walls of the canyon rise from the river in a series of terraces, interrupted at intervals by side canyons. Deltas as much as one-eighth mile wide have formed at the mouths of those side canyons.

Access to Study Area

The study area is accessible by boat and road. Boats reach the study area both from downstream and from upstream. Once a week, a commercial boat travels the 33 miles during its round trip between Lewiston and Johnsons Bar. That boat services the inhabitants along the river, including the delivery and pickup of mail and goods and the transport of passengers up and down the river. The only public boat launching facility within the study area is near the mouth of the Grande Ronde on the Washington side. There, the Washington Game Department has provided a boat ramp and parking space for about 50 automobiles and trailers.

Public road access (see Map 9) is limited to the Washington side of the river and extends from the town of Asotin, upstream to the Grande Ronde. The county-maintained road is paved for 10 miles from Asotin south to Couse Creek, and gravel surfaced beyond that point. For most of the distance, the road is within 100 yards of the river. Where lands between the road and river are in private ownership, trespass by river users has become a problem. At a few points, notably Ten Mile Creek, cultivated farmlands separate the road from the river by as much as a quarter of a mile. The road turns westward up the Grande Ronde, crosses it, and eventually extends southward into Oregon. Several roads also descend to the river from the high ridges which flank the canyon in Idaho, Washington, and Oregon. All are private and unimproved, with steep grades and sharp turns. Upstream from the study area, road access to the Snake exists at Pittsburg Landing on the Idaho side and from the base of Hells Canyon Dar and from the Imnaha River on the Oregon side. Roads also extend to the Salmon River in Idaho.







A county road extends along the Washington side of the study segment upstream to the Grande Ronde.



One landing strip exists along the study segment on the Washington side near Cache Creek. Several exist upstream from the study area within the canyon.

Land Ownership, Use, and Controls

Of the lands fronting the study segment, exclusive of the upper 4 miles within the National Recreation Area, 71 percent are privately owned, 15 percent State owned, and 14 percent federally owned. See Map 9 and Table 4. The Corps of Engineers has 40 acres near the town of Asotin. The balance of Federal lands are under the administration of the Bureau of Land Management. Most State-owned lands are administered by the Idaho Department of Fish and Game, but there also are State school sections and state or county parks and access points. The bed of the river below the mean high water line is owned by the states.

There are 151 individual private ownerships which include a total of 41.2 miles of frontage. By state, those include 97 ownerships and 20.1 miles of frontage in Idaho, and 54 ownerships and 21.1 miles in Wash-ington.



Homestead on Idaho side of the Snake, downstream from the Grande Ronde

	<u>Idaho</u>	Washington	<u>Total</u>
NRA to Grande Ronde			
Federal	0	4.0	4.0
State	0.2	0	0.2
Private	6.9	<u>3.0</u>	<u>9.8</u>
Total	7.0	7.0	14.0
Grande Ronde to Asotin			
Federal	0.7	3.2	3.9
State	8.0	0.7	8.7
Private	<u>13.3</u>	<u>18.1</u>	<u>31.4</u>
Total	22.0	22.0	44.0
NRA to Asotin			
Federal	0.7	7.2	7,9
State	8.2	0.7	8.9
Private	20.1	<u>21.1</u>	41.2
Total	29.0	29.0	58.9

Table 4.	Miles of Frontage along the 29 miles Downstream from	the
	National Recreation Area	

The acreages by ownership within one-quarter mile from each side of the river along the 7 miles between the National Recreation Area boundary (Oregon-Washington state line) and the Grande Ronde, and one-eighth mile from each side of the river along the 22 miles between the Grande Ronde and Asotin, are summarized in Table 5.

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	<u>I da ho</u>	Washingto	n <u>Total</u>
NRA to Grande Ronde (1/4-mil	lé back)		
Federal	0	640	640
State	32	0	32
Private	<u>1,088</u>	480	1,568
Total	1,120	1,120	2,240
Grande Ronde to Asotin (1/8-	-mile back)		
Federal	56	256	312
State	640	56	696
Private	1,064	1,448	2,512
Total	1,760	1,760	3,520
NRA to Asotin (total above)			
Federal	56	896	952
State	672	56	728
Private	2,152	1,928	4,080
Total	2.880	2,880	5,760

Table 5.	Acreage within the Tentative Boundaries along the	29 miles
	Downstream from the National Recreation Area	

As of September 1978, 40 residences existed adjacent to or near the river downstream from the National Recreation Area boundary, including 16 in Idaho and 24 in Washington. As shown in Table 6, 16 of those were permanent residences associated with farming or livestock operations, while 24 were vacation homes.



	Idaho	<u>Washington</u>	<u>Total</u>
NRA to Grande Ronde (within 1/4 mile)			
Ownerships	941/	24 <u>2</u> /	118
Residences Full time	1	3	4
Part time	9	11	20
Grande Ronde to Asotin (within 1/8 mil	le)		
Ownerships	<u>31</u> /	30 <u>2/</u>	33
Residences Full time	2	10	12
Part time	4	0	4
NRA to Asotin (total)			
Ownerships	97	54	151
Residences Full time	3	13	16
Part time	13	11	24

Table 6. Number of Private Ownerships and Residences along the 29 Miles Downstream from the National Recreation Area

 $\frac{1}{2}$ Recorded on books in County Assessor's Offices 9/7/78. Includes two 40 unit (5-acre each) subdivisions.

 $\frac{2}{7}$ Recorded on books in County Assessor's Offices 9/7/78

There is one resort along the study segment, Heller Bar, located onequarter mile below the Grande Ronde on the Washington side of the river. That resort includes a five-unit motel, restaurant, and boat dock, as well as the residence of the proprietor.

Agricultural uses within the study area include grazing and cultivation. The Soil Conservation Service estimates 475 animal unit months use of the 5,760 acres along the study segment. Approximately 250 acres are in cultivation, mostly along the Washington side of the river downstream from the Grande Ronde.



Rogersburg, Washington, located at the confluence of the Grande Ronde with the Snake.

In 1977, one private landowner along the Washington side of the river downstream from the Grande Ronde subdivided a portion of his waterfront lands into 5-acre lots. All were sold. A 40-acre subdivision exists at Rogersburg on the Washington side of the recommended scenic portion of the river immediately upstream from the Grande Ronde. Within that subdivision are 18 lots, including nine on which homes have already been constructed. Upstream from the Grande Ronde on the Idaho side of the river are additional subdivisions in which waterfront lots are being actively marketed.

No powerlines cross the study segment. However, the Bonneville Power Administration has a long-range plan for a corridor of high capacity transmission lines utilizing the downstream 10 miles of the study area.

Both counties bordering the Idaho and Washington portions of the study segment have land use controls in effect. They provide varying degrees of protection for the river environment. Within Idaho's Nez Perce County, only lots 5 acres or larger can be sold without platting and each lot must have a minimum width of 50 feet. Before residences can be constructed, the County must issue a building permit with issuance dependent upon approval by the Idaho State Board of Health of plans for sewage disposal. To be considered adequate, sewer facilities must be designed so that none of the effluent reaches the river.

Within Washington's Asotin County, waterfront developments are governed by provisions of the Shoreline Management Act, Hydraulics Project Act, and other State laws. Under the Shoreline Management Act, lands classified rural, as are the lands fronting the study segment, may not be subdivided into lots smaller than 5 acres, with a minimum width of 75 feet. New developments must reflect the rural character of the surrounding area and be set back adequately from the river. The rural designation is intended to protect agricultural land from urban expansion and maintain open space and opportunities for recreation that are compatible with agricultural activities.

Flora

The terraced hillsides of the lower canyon downstream from the Grande Ronde, all the way to the rims, are mostly covered with bunch grasses mixed with cheat grass. Crested wheat grass has been planted. Intermixed with the grasses are couse, prickly pear, mustard, and other herbacious varieties. Along the river, especially in and below the side canyons, hackberry is common, with some sage, elderberry, osage orange, willow, poison ivy, and broad-leafed balsam. High in the side canyons on the Idaho side and outside the study corridor are commercial stands of Douglas fir and ponderosa pine.

Upstream from the Grande Ronde, much of the riverfront is water-polished rock with lichen, moss, and ferns growing from cracks and on ledges. Along the main river on benches and at the mouth of side canyons are hackberry, sumac, black hawthorne, and poison ivy. Higher in the side canyons are small stands of aspen, and occasional cottonwood, Douglas fir, and ponderosa pine.

Proposed endangered plant species which may exist within the study area, as identified by the U.S. Fish and Wildlife Service in the Federal Register of June 16, 1976, are:

Asteraceae - Aster Family Antennaria arcuata - Pussy toes

- Asclepiadaceae Milkweek Family Haplopappus radiatus - Goldenweed
- Nyctaginaceae Four o'clock Family Mirabilis macfarlanei - Mac Farlane's Four o'clocks
- Primulacae Primrose Family Primula cusickiana - Willow Primrose Steironeme laevigatum - Loosestrife, fringed

The following taxa are under notice of review as threatened plants in the July 1, 1975, <u>Federal Register</u>, and are in, or likely to be in, the study area:

Apiaceae Lomatium rollinsii - Rollins desert parsley Lomatium serpentinum (may be deleted from candidate list) - Snake Canyon desert parsley

Boraginaceae

Hackelia hispida (may be deleted from candidate list) - Rough stickseed

Liliaceae Allium tolmiei var. persimile - Tomie's onion (variety)

Rosaceae Rubus bartonianus - Bartonberry

Fauna

The most abundant big game animal occurring along the study segment is the mule deer. It is resident in the sheltered side drainages. White-tailed deer occupy some of the high ridges. The area is a major wintering grounds for deer. Elk range along the canyon rims upstream from Captain John Creek and migrate to within sight from the river during winter. Large predatory species include mountain lion, black bear, bobcat, and coyote. Along the river, otter are common, as are racoon, porcupine, mink, and beaver. It is doubtful that mountain goat occur within the study area, although they are found upstream, especially on the high mountains flanking the canyon. Mountain sheep have been reintroduced on the Washington side of the canyon near the Grande Ronde; most have moved to the Idaho side.

The river, riparian zones, canyon, and canyon rims are sanctuary to the many species of birds native to the region. They include ducks, geese, and other waterfowl; shorebirds; gulls; buteonine hawks; accipitorine hawks; owls; and songbirds. The golden eagle is a yeararound resident. Chukar partridge are abundant and Hungarian partridge and valley and mountain quail also occur. Among the most conspicuous are blue heron, kingfisher, water ouzel, crow, raven, and magpie.

Spring, summer, and fall chinook salmon and summer steelhead trout are the species of anadromous fish found in the study segment (see Table 7). Due largely to the detrimental impacts of water development projects, all species of anadromous fish utilizing or passing through the study area are currently being considered for possible listing under the Endangered Species Act of 1973. Over 90 percent of the spring and summer chinook and generally more than 60 percent of the summer steelhead trout counted over Lower Granite Dam pass through the study area to upstream spawning grounds. Many Clearwater River steelhead also utilize the study segment during the winter prior to moving into the Clearwater River.

Fall chinook spawn in suitable areas scattered within and above the study segment. Having already lost hundreds of miles of spawning and rearing habitat to mid- and lower-Snake River dams, that stock of fish is presently in a very precarious state. The study segment represents about 30 percent of the remaining Snake River spawning and rearing habitat left for fall chinook. Fewer than 2,000 fall chinook returned to or above the study area in 1979 where as many as 27,600 were found in 1962.

Resident game fish in the study area are smallmouth bass, channel catfish, rainbow trout, Dolly Varden, whitefish, and white sturgeon. The study segment represents about 30 percent of the remaining Snake River habitat for the mid-Snake sturgeon population. Other fish include carp, chiselmouth, coarse and bridgelip suckers, redside shiner, dace, sculpins, and squawfish.



Table 7.	Estimated Average Annual	Production Potential of Anadromous
	Fish from Spawning and R	learing Areas in and above the Snake
	<u>River St</u>	udy Segment1/
Spect	ies	Number of Adult Fish Produced
Sprin	ng chinook	292,000
Summe	er chinook	218,000
Fall	chinook	30,000
Steel	lhead	143,000
Socke	еуе	30,000
-	Total	713,000

1/ The production figures in this table are based on the Columbia River Fisheries Council's estimate of the demonstrated anadromous fish production from the Snake River prior to the construction of McNary Dam. The figures represent the production level for which mitigation measures are being planned and achieved by the involved State and Federal fishery agencies. While the production estimates are based on historic runs, the planned production as represented in this table is a realistic estimate of what can be and is being achieved through a mix of natural and hatchery production which fully utilizes the remaining natural habitat while minimizing the unavoidable constraints of the present water development projects. Any additional constraints could seriously jeopardize the realization of this program.

A significant sport fishery for steelhead exists from September through April, with peak angling pressure occurring during October and November. The fall chinook contribute mainly to the sport and commercial fisheries in the Pacific Ocean and Columbia River.

Minerals

In 1977, the U. S. Bureau of Mines evaluated the mineral resources of the study area. Minerals found were limestone, copper, and placer gold. Only limestone was found in significant quantities. The limestone is located in deposits which are found one-half mile upstream from the Grande Ronde near river mile 170. See Map 10. The U. S. Bureau of Mines reports that the deposits contain an estimated 5.5 billion tons of high grade limestone. Most of the limestone is in private ownership, with 416 acres on the Washington side of the river owned by Ideal Basic Industries, and 606.5 acres on the Idaho side owned by The Limestone Company, a subsidiary of Washington Water Power Company. Ideal Basic Industries' holdings front the river for approximately 3,000





Area of limestone deposits, Washington side

feet, extend back from the river about 6,000 feet, and include an estimated 2.6 billion indicated or inferred tons of limestone located above the elevation of the river. Below the elevation of the river, an additional 0.9 billion tons would be available from open pit operations mined to a depth of 500 feet. The Limestone Company's lands front approximately 5,000 feet of river, extend back a maximum of 7,000 feet, and include an estimated 1.4 billion indicated tons of limestone above the elevation of the river, plus 0.6 billion tons available to open pit mining.

Copper is found along geologic contacts and structures in pre-Tertiary rocks. Significant copper concentrations exist at several prospects, but none are estimated to contain more than 500 tons. Known resources in the area would not support a custom mill. The copper occurrences are probably part of a larger metallogenic province including the Seven Devils mining district.

Gold occurs in both recent alluvium and ancient bench gravel deposits. Recovery methods, legal restrictions, and apparent low grades limit the potential of those placers as a gold resource in the foreseeable future.

Archeology

An archeological reconnaissance of all but the upper 4 miles of the study segment was completed by Washington State University during the summer of 1964 with funds provided by the National Park Service. The study was made to determine the effects on archeological sites if the Asotin Dam were constructed. A large number of sites were found and evidence indicated the area had been utilized for some 8,000 years. The upper reaches of the study segment were occupied by the Nez Perce Indians and have been linked to the Nez Perce War of 1877. Numerous seasonal campsites, house pits, burials, storage shelters, and additional sites including pictographs, petroglyphs, fish walls, storage pits, and sweat lodges were identified during the reconnaissance. Based in part on the results of the reconnaissance, the Snake River Archeological District was entered on the "National Register of Historic Places" in 1976. The District encompasses both banks of the Snake River from Asotin to the Oregon state line. The designation establishes the importance of the area relative to the cultural heritage of the Nez Perce and other earlier occupants.

The first white explorers found the study area inhabited by Nez Perce Indians. Significant Indian use of the area continued until about 1930, but has diminished steadily since then. Due to the limited area and precipitous canyon walls, it is probable that use was never great. The winter climate was more favorable than on the adjacent plateaus and, therefore, the river canyon served chiefly as a wintering place for small tribal groups.



History

The first known attempt by white men to descend the Snake River through Hells Canyon occurred in 1811 and was by the Hunt party. In 1834, Captain B. L. E. Bonneville travelled a portion of Hells Canyon. An account of that exploration, as publicized by Washington Irving, described the scenery as filling Bonneville's men with:

...admiration and astonishment. At times, the river was overhung by dark and stupendous rocks, rising like gigantic walls and battlements: these would be rent by wide and vawning chasms, that seemed to speak of past convulsions of nature. Sometimes the river was of a glassy smoothness and placidity, at other times it roared along in impetuous rapids and foaming cascades. Here, the rocks were piled in the most fantastic crags and precipices; and in another place they were succeeded by delightful valleys carpeted with greensward. The whole of this wild and varied scenery was dominated by immense mountains rearing their distant peaks into the clouds. "The grandeur and originality of the views presented on every side," says Captain Bonneville, "beggar both the pencil and the pen. Nothing we had ever gazed upon in any other region could for a moment compare in wild majesty and impressive sterness with the series of scenes which here at every turn astonished our senses and filled us with awe and delight."

No further exploration of Hells Canyon occurred until 1862 when, with the discovery of gold along the Salmon River and in the Boise Basin, an expedition ascended the canyon to determine whether it was navigable for steamboat service between Lewiston and Fort Boise. After many futile attempts to establish boat service to facilitate mining and ranching operations, service from Lewiston upstream 75 miles to Pittsburg Landing was initiated in 1910, and in 1914 extended on a regular basis an additional 16 miles to Johnsons Bar. Today, a weekly mail boat makes the 182-mile round trip between Lewiston and Johnsons Bar.

At various times, consideration was given to a railroad or automobile road through the canyon, but abandoned because of terrain difficulties and prohibitive costs.

The canyon was prospected beginning in 1865, but the most intensive prospecting period was from the 1880's to 1908, and again briefly in the early 1930's. Over 700 claims were filed at one time or another. Placer mining at China Gardens within the study segment and other locations was attempted by Chinese "coolie" labor. A group of 31 of the Chinese were murdered by outlaws in 1887. Placer deposits usually were worked by digging a series of parallel trenches below the high water line to trap gold bearing sand during floods. The accumulations were then sluiced to recover the gold.



The Shoshone, a stern wheeler built in 1866 to ply the Snake River.

Many limestone claims were located and limekilns built. Construction of cement plants at Rogersburg and Asotin were started but not completed. Hardrock prospecting was mainly for copper. Building stones used in the Lewiston area were also quarried in the canyon.

Stockmen began wintering cattle in the canyon during the 1860's and homesteaders settled there during the 1870's. Today, their successors operate cattle ranches strung out along the canyon bottom where topography permits, including several along the upper reaches of the study segment.

Except for the Snake River Archeologic District mentioned in the previous section, there are no historic properties in the study corridor on or nominated to the "National Register of Historic Places."

Recreation

The study segment, together with the 67 miles upstream, is the last remaining free-flowing section of the Middle Snake. As such, it beckons the outdoorsmen who seek the type of recreation associated with running water.

There is a marked difference in the kinds and intensity of use between the Hells Canyon portion upstream from the Grande Ronde, and the portion downstream. Hells Canyon, ending at the Grande Ronde, draws people from across the country and around the world. They come to challenge the river, fish, hunt, camp, and enjoy the spectacular scenery. Hiking within the canyon and along the river where terrain permits is becoming more popular. Below the Grande Ronde, the river and canyon are less imposing. Much of the use there is by residents living downstream (north) in the Lewiston-Clarkston area who travel up the river by boat or car for upland bird hunting, an evening of fishing, or a summer weekend of swimming, inner-tubing, sunbathing, or picnicking.

Because of the limited road access, many recreationists depend on boats as their means of enjoying the area, whether for fishing, hunting, camping, swimming, or sightseeing. Boating takes two forms: floating or nonmotorized, and powerboating. The former includes the use of rubber rafts, canoes, and kayaks, and the latter involves the use of jetboats and motorboats.

The most common practice is for the floatboaters to embark from one of a number of access points upstream from the study segment, including Hells Canyon Dam, Pittsburg Landing, the Imnaha River, and points along the Salmon River, and spend several days floating and camping before debarking at the Grande Ronde. A popular one-day float is from the Grande Ronde downstream to Asotin.

Floatboat use figures compiled by the BLM for the lower Salmon River are pertinent to the study segment because 85 to 90 percent of the



use continues down the Snake to the Grande Ronde. Figures from the years 1972 through 1978 are as follows:

		Trips			Users		لا	ser Day	s
Year	<u>Comm.</u>	Pvt.	<u>Total</u>	Comm.	Pvt.	<u>Total</u>	Comm.	Pvt.	Total
1972	1	2	3				17	11	38
1975	23	20	42	290	189	479	1,185	1,075	2,260
1976	46	41	87	625	326	951	2,492	1,335	3,827
1977	60	47	107	890	347	1,237	3,442	1,527	4,969
1978	61	25	86	1,186	200	1,386	4,742	666	5,408

In 1978, the number of commercial trips comprised 71 percent of the launches; they also accounted for 88 percent of the user days. This is due to the larger party size and slightly longer trips. Most use (75 percent) occurs during the months of July and August. Although the computation of 1979 use statistics had not been completed at the time this report was prepared, preliminary data indicated total use increases of from 35 to 45 percent over 1978.

The Forest Service has compiled data on floatboat use from Hells Canyon Dam downstream to the Grande Ronde for the years 1973 through 1978:

	_	<u>Boat Trips</u>		User Days
<u>Year</u>	<u>Private</u>	Commercial	<u>Total</u>	Private Commercial Total
1973	38	61	99	1,395 4,776 6,171
1974	45	76	121	1,586 7,070 8,656
1975	56	76	132	1,482 7,755 9,737
1976	56	94	150	2,710 7,449 10,159
1977	129	104	233	4,555 7,653 12,208
1978	146	126	272	5,063 10,069 15,132

The Forest Service limits floatboat launches to 5 per day from the Hells Canyon Dam launch site between May 21 and September 9. A permit system has been employed by the Forest Service since 1978. Party size for both private and commercial floaters is 30 persons or less. During the 1979 regulated season, 60 percent of the permitted use was allocated to private users and 40 percent to commercial parties.

An analysis of river permits for floatboat trips issued at the Hells Canyon Dam launch site since 1973 reveals: 1. Total user-days for floatboat use more than doubled.

2. The average annual increase in user-days by floaters was 20 percent.

3. Commercial user-days increased an average of 16 percent annually while private use increased an average of 30 percent annually.

4. The average group size of private parties was smaller than commercial parties. Average group size for commercial parties was about 15 persons while private parties averaged between 7 and 8 persons.

Most use occurred in July and August.

Nost powerboaters embark from the Lewiston-Clarkston area where there are a number of large marinas. Existing slips in public marinas there accommodate 165 boats. Planned ultimate developments will have a capacity of 800 boats. Many powerboaters ascend only as far as the Grande Ronde. The more adventurous continue upstream past the Grande Ronde to destinations along the Snake all the way to Hells Canyon Dam, as well as up the Salmon. A lesser number tow their boats to the Washington Department of Game ramp at the Grande Ronde where they embark and head up or down river.

During the summer of 1977 (June 25 - September 12), the Forest Service and BLM collaborated in a study of powerboat use. Personnel stationed at the mouth of the Grande Ronde counted 583 powerboat trips. The number of private trips observed was 374 (64 percent) and commercial 209 (36 percent). Of the total, 463 (79 percent) were day use only and 120 (21 percent) overnight.

The Washington Department of Game and the Idaho Department of Fish and Game conducted a 2-year study (May 1969 to May 1971) to determine recreational use along the 29 miles of river that would be impacted by Asotin Dam. Counts of recreationists provided the basis for an estimate of 64,752 user-days of recreation, including 22,974 angler user-days, 1,765 hunter user-days, and 40,013 general recreational user-days, as summarized in Table 8. An estimated 5,239 boat-days were devoted to recreation. Those estimates are considered minimal due to abnormally low flow conditions and smaller-than-average steelhead runs which depressed use during the study period. The highest use by both hunters and fishermen occurred in September and October. General recreationists and boaters were most numerous in July and August.

			Recr	eation Days	
<u>Month</u>	<u>Boat Days</u>	Fishermen	Hunters	0thers <u>1</u> /	Monthly Totals
Мау	181	1,275		1,868	3,143
June	509	2,575		3,718	6,293
July	1,371	2,264		12,174	14,438
August	1,132	1,411		14,595	16,006
September	588	6,337	637	2,177	9,151
October	516	4,384	479	1,038	5,901
November	438	2,064	344	444	2,852
December	139	640	155	133	928
January	141	484	150	958	1,592
February	20	290		320	610
March	134	787		647	1,434
April	70	463		1,941	2,404
Totals	5,239	22,974	1,765	40,013	64,752

Table 8.	Monthly and	<u>i Annual Rec</u>	creation Use	e Estimates
	on the	Asotin Dam	Impact Area	1

 $\underline{\mathcal{U}}$ A general use category including picnicking, swimming, boating, etc.

The Forest Service estimates that recreation use during 1977 along the 71 miles of Snake River in the Hells Canyon NRA was:

Floatboating	30,000 visitor days
Powerboating	18,000 visitor days
Hiking	2,000 visitor days
Fishing	2,000 visitor days
Dam visits	<u>3,000</u> visitor days
Total	55,000 visitor days

The study segment of the river has very limited recreational facilities. Undeveloped camping and picnic sites exist at several state and county areas below the Grande Ronde on the Idaho side. The only site
with modern toilet facilities is the Washington State Department of Game boat launching site at the mouth of the Grande Ronde River.

Heavy hunting use is made of the lands fronting the study segment, especially downstream from the Grande Ronde by chukar hunters during a season extending from September to January. Quail are also hunted, as are geese and mallard ducks. Mule deer are hunted along the river, but most hunting occurs in the side drainages far back from the river and outside of the study area.

Based on past studies and the most current information, recreation use along the 33-mile study area during 1979 is estimated to have been:

Recreation Days

Floatboating	25,000
Powerboating	15,000
Fishing	5,000
Hunting	2,000
Other	50,000
Total	97.000

Recreation use in the study area currently appears to be increasing at a rate of about 20 percent annually.

Water Development Proposals

Various plans to develop the hydroelectric power potential of Hells Canyon have been proposed by public and private power interests down through the years. Several plans involve the 33-mile study segment. In 1962, Congress authorized construction by the Corps of Engineers of a dam one-half mile upstream from the town of Asotin. As proposed, the reservoir would have extended upstream almost 28 miles. It was deauthorized in 1975 in the Act creating the Hells Canyon National Recreation Area.

In 1968, the Pacific Northwest Power Company and the Washington Public Power Supply System applied to the Federal Power Commission for the license to construct dams at several alternative locations, one of which was at the China Gardens site located 8 miles downstream from the upper terminus of the study segment. China Gardens was designed to be a reregulating dam to serve the much higher High Mountain Sheep Dam proposed on the Snake 1 mile upstream from the confluence of the Salmon River. The proposal to develop the High Mountain Sheep and China Gardens sites was extinguished with the creation of the Hells Canyon National Recreation Area.

In 1979, the Pacific Northwest Generating Company applied to the Federal Energy Regulatory Commission for a preliminary permit for a

license to construct a dam at Asotin, similar to what the Corps of Engineers had proposed earlier. That application currently is pending.

Further details about the possible construction of a dam at the Asotin site are provided in Chapter VIII.

Water Rights

There is considerable use of appropriated water upstream from Hells Canyon Dam. Within the study segment, however, there are no perfected rights to appropriated water in Oregon and Idaho. The State of Washington has perfected 10 rights for 2,000 gallons per minute to irrigate a total of 220 acres. The volume of water that could be withdrawn by holders of perfected water rights is an insignificant portion of the river volume.

III. THE ENVIRONMENTAL IMPACT OF THE PROPOSED ACTION

Impacts on Local Economy

If present economic trends continue, protection of the 33 miles σf river and adjoining lands with the upper 11 miles under Forest Service administration (4 miles already are under Forest Service administration as part of the Hells Canyon NRA) and the lower 22 miles under joint administration by the States of Washington and Idaho and/or Nez Perce and Asotin Counties, would have a relatively minor impact on the local Those economies are broad based enough so as not to be economies. significantly affected by the results of the proposed action. With limitations placed on the amount of public recreation use permitted along the river so that use does not exceed carrying capacity, the long-range result likely would be less use than would be the case if the river segment were left in an unprotected status and no controls on use were imposed. That in turn would mean a lower demand for groceries, motel rooms, restaurant meals, boat rentals, and gasoline, once the recreation carrying capacity is reached. Until the recreational carrying capacity of the 33 miles has been determined, it is impossible to know what the effects will be.

If addition of the 33 miles to the National Wild and Scenic Rivers System prevents construction of Asotin Dam, the local economic impact would be substantial. As discussed in Chapter VIII under Alternative One, Option Two, employment of 900 to 1,000 during construction of the dam and 28 to operate the completed dam would be foregone, including a loss of \$28.2 million annually in payrolls during construction and \$1.1 million annually in increased local income from operation of the completed dam.

Impacts on Local Governments

Management and protection of the study segment by Federal, State, and/ or County agencies, especially the section of river downstream from the Grande Ronde, should help to relieve Asotin and Nez Perce Counties of some of the responsibility they now have to provide for public use along the river. Rather than the two counties having to bear most of the responsibility as is presently the case, State agencies and/or the Forest Service would help in this responsibility. In fiscal year 1978, Nez Perce County budgeted \$24,000 for boat patrol, litter cleanup, and search and rescue along the study segment. Under agreement with Asotin County, it performs those functions on the Washington side as well as on the Idaho side. The County's total budget was \$4.1 million. Asotin County budgeted \$53,000 for maintenance of the road extending along the river from Asotin to the Grande Ronde, out of a total budget of \$3.4 million. While those costs are not excessive, they are a substantial burden to the two counties which have only limited funds for such purposes.

To the extent that lands or interest in lands must be acquired along the 41.2 miles of frontage in private ownership to prevent subdivision and other kinds of incompatible development, a loss in county tax revenues would result. For example, about \$9,000 in tax revenue would be lost if scenic easements were acquired on most of the 4,080 acres in private ownership. Even though each county has land use controls in effect, as described in <u>Land Ownership</u>, Use, and <u>Controls</u>, additional development can occur. The lands downstream from the Grande Ronde on both the Idaho and Washington sides of the river are especially vulnerable.

While the counties would forego tax revenue, they would not have to absorb the cost of providing services the development of these lands would necessitate, such as added enrollment in schools.

If addition of the 33 miles to the National System prevents construction of Asotin Dam, then \$18.1 million annually in county tax revenues resulting from operation of the dam would be foregone.

Impacts on Land Ownership and Use

The Forest Service would acquire scenic easements along privately owned river frontage upstream from the Grande Ronde. A scenic easement is a legal agreement between a landowner and the United States Government in which the landowner agrees to refrain from putting the property to certain specified nonconforming appearances or uses, such as defacement of river frontage, the construction of rental cottages, etc. Such an easement, however, would not affect, without the owner's consent, any regular use exercised prior to the easement acquisition. The landowner is paid the value of the property rights granted. The easement is recorded in the county records and remains in effect through present and subsequent landowners. Title to the land is retained by the owner, subject to the rights acquired by the United States. The land remains on the county tax rolls.

If privately owned lands are acquired in fee by the Forest Service, the private owners may elect to retain for themselves or their successors the right to use and occupy the land for noncommercial residential purposes for 25 years or for their lives and that of their spouses. Payment may be spaced over as much as 4 years for tax purposes.

Along the lower 22 miles, the administering agency or agencies would acquire scenic easements along privately owned riverfront lands, as well as acquiring fee title where it is necessary to provide public access, parking areas, and any camping sites or picnic areas that cannot be accommodated on those State-owned lands already lying within the mean high water line. Most of the fee acquisition would occur on the Washington side because of the need to provide access points and parking areas off the existing county road. The objective of acquiring lands or interest in lands would be to protect the immediate river environment and to provide the necessary public use facilities. Easements would not interfere with existing agricultural uses of the lands. They would serve to stop further subdivision and other types of development which degrade the immediate river environment. Easements on an estimated 3,972 acres in easements and fee on 108 acres may need to be acquired, including 2,152 acres in easements in Idaho, and 1,820 acres in easements and 108 acres in fee in Washington. There are 97 individual private ownerships in Idaho and 54 in Washington.

To the extent that local zoning would accomplish the same objectives as scenic easements, the acquisition of scenic easements would be unnecessary.

In summary, protection of the 33 miles by the Forest Service and/or States/Counties would have a major impact on private landowners along the river.

Impacts on Livestock Grazing

Livestock grazing in amounts consistent with good range management practices is considered to be compatible with river protection. A minor amount of livestock use, approximately 475 animal unit months according to the Soil Conservation Service, occurs along the 33-mile study segment. Much of the approximately 5,760 acres within the tentative boundaries is adaptable to and receives livestock use at one time or another. The amount of use upstream from the Grande Ronde, however, is limited by the steep and rocky terrain. Downstream, livestock use is limited by low forage production. Practically all use is by range cattle whose ownership is divided among six ranch operations. No major change in livestock use would be necessary. The impacts of designation would be negligible.

Impacts on Mining

In the past, there has been extensive prospecting along the study segment with some 700 mining claims on file, including more than 500 lode claims, most for copper, and at least 150 placer claims for gold or limestone. Two areas of claim locations were patented and are now owned by The Limestone Company (see Map 10). As of 1979, there are no claims being actively worked and the only significant mining potential identified by the Bureau of Mines appears to exist in the large limestone deposits located one-half mile upstream from the Grande Ronde.

Designation of the river as recommended could have an adverse impact on the extraction of limestone, the only apparent mineral occurring in commercial quantities. Extraction may be impeded because of the need to safeguard the scenic and environmental values of the affected lands and waters. To the extent existing State and Federal statutes



Much of the land along the study segment receives dispersed livestock use.

and regulations would fall short of adequately protecting those values, easements may have to be acquired from the private owners. The easements would spell out what, if any, additional precautions the private owners would have to take in extracting the limestone and the measures needed to restore the sites once extraction has been accomplished.

State laws and regulations are in effect in both Washington and Idaho which are designed to protect lands and waters from undesirable mining practices. Both states require the maintenance of water quality standards; the protection of stream channels against alterations which would adversely affect wildlife, recreation, or aesthetic values; and the reclamation (including revegetation) of surface mined lands. Both states require the filing of plans which satisfactorily describe the methods of operation and reclamation. Reclamation must be completed within 2 years of the termination of mining in Washington, and commenced within 4 years of termination in Idaho. Both states require the posting of performance bonds. In Washington, the bonding requirement ranges from \$100 to \$2,500 per acre, and in Idaho \$500 per acre must be posted. Both states may prevent mining within the river channel as far back as the mean high water line.

Beyond the mean high water line, Washington has authority to prevent mining in certain circumstances. The State may deny a mining application if it finds that the area to be mined is unsuitable because reclamation is infeasible or environmental values would be unduly affected. For example, Washington could prevent mining where it would adversely affect important scenic values, as in parks.

Unlike Washington, Idaho does not have authority to deny a mining application affecting lands back from the mean high water line solely for purposes of protecting scenic value. Idaho may only specify the method of reclamation so as to minimize adverse effects.

In the case of the limestone deposits adjacent to the study segment, both states have authority to safeguard scenic values by regulating the method of mining and reclamation, but only Washington could go as far as denying an application in order to protect those values.

Designation, by preventing construction of Asotin Dam and the associated navigation locks, may also retard the transportation of the limestone downstream by barge to railheads and markets. Barging appears to be the most economic and feasible method of moving the limestone. Without a dam, barging would be more difficult and possible for only about 9 months of the year. With a dam, year-around navigation by barge would be possible.

Impacts on Recreation and Scenic Values

Designation of the study segment may result in a minor short-term increase in recreation use over what would otherwise occur. Instead



Jet boats are a popular means of transportation on the river.

of recreation use increasing at the current rate of about 20 percent annually, the rate could be expected to increase to 25 percent annually. Actually, most of the area's potential for attracting additional recreation users was realized when the Hells Canyon National Recreation Area was created. It is expected that addition of the 33-mile study area to the National Wild and Scenic Rivers System will make relatively little difference in the number of people that will be attracted.

Under the recommended plan, the amount of recreation use will be controlled. Special measures will be taken to guarantee the high quality recreation experience presently available along the river by limiting the amount and kinds of recreation use so that it will not exceed the recreation carrying capacity of the area. The carrying capacity has yet to be determined; therefore, it is not possible to describe the extent of limitations which would be needed.

Downstream from the Grande Ronde, the amount and kinds of uses will be regulated by facility design; i.e., access points, parking spaces, picnic areas, etc. On the upstream segment, use will be controlled mainly by managing the number of boats permitted on the river at a given time.

In the long run, less recreation use and a better mix of uses will occur under the recommended plan than otherwise are likely to occur.

The recommended plan would also benefit scenic values. Management would serve to prevent development and use of the river corridor in ways which would impair those values. The removal of riverfront vegetation, bulldozing of banks, and the construction of structures along the banks are examples of uses which would be discouraged.

Impacts on Water Resource Development, Water Uses, and Water Rights

Designation would prevent the construction of dams or other water developments along the 33-mile study segment. The segment embodies a significant unrealized potential for hydroelectric power generation. The possibility of constructing dams at the Asotin site (mile 147) and the China Gardens site (mile 172), both within the 33 miles, has been investigated. Development of the Asotin site continues to be a viable possibility and is the subject of an application before the Federal Energy Regulatory Commission for preliminary permit by the Pacific Northwest Generating Company, as discussed earlier. Development of the Asotin site to a pool elevation of 842 feet would result in the production of 230 MW average annual energy (see the discussion under Alternative One, Option Two). Development of the China Gardens site was foreclosed by Congress in 1975 when it established the Hells Canyon National Recreation Area, the boundary of which is only 5 miles upstream from the location of the damsite. There would be little or no impact on existing water uses. A relatively minor amount of water (2,000 gallons per minute) is pumped seasonally from the Washington side of the river downstream from the Grande Ronde for irrigation. Designation would not change that use.

Section 6 of the act establishing the Hells Canyon National Recreation Area guarantees the continued use of the Snake River by water users upstream from the NRA and declares that no flow requirements of any kind for wild and scenic river purposes will be imposed below Hells Canyon Dam. The recommended plan reaffirms the intent of that language.

Impacts on Water Quality

Existing Federal and State water quality standards would continue in effect along the 33 miles. Management controls on the types and extent of recreation use and the provisions of sanitary facilities at public use areas along the river would be designed to carry out those standards. Controls on the use and development of adjacent lands would permit only land uses harmonious with maintaining good water quality. The Forest Service and/or states/counties would assign personnel to encourage proper waste disposal practices on the part of recreation users and guard against practices which may result in pollution.

Impacts on Soils and Vegetation

Although some disturbance of soil and vegetation is unavoidable, one important goal governing future use of the river would be to protect those resources. Public use of river frontage would be managed so that areas subject to erosion will not be impacted. Steps would be taken to prevent the use of standing vegetation for firewood. Zoning and scenic easements would include limitations on subdivision and other types of developments which may have adverse impacts along the river. Special measures would be taken to prevent range fires.

With designation of the river, special efforts would be made to identify areas containing endangered and threatened plant species, several of which may occur along the river, and then steer the public away from those areas. All plants which are candidates under notice of review or proposed in the Federal Register as Threatened or Endangered will be treated as listed until investigation proves them ineligible for that status. Management plans for a designated wild and scenic river will provide the measures to avoid jeopardizing the continued existence of candidate species in the river corridor.

Impacts on Fish and Wildlife

As with soil and vegetation, management plans for the river would give special attention to the protection of fish and wildlife. The states would continue to have jurisdiction over fish and wildlife management and be responsible for setting seasons and limits. The recommended plan would preclude the construction of dams which would inundate prime deer wintering areas, game bird rearing habitat, and affect the present sport fishery by inundating anadromous fish spawning and rearing areas, as well as impeding migration. Restriction on the number of users and kind of allowable uses would be designed to protect fish and wildlife resources. Those factors, plus protection of the riparian habitat would result in major protection for fish and wildlife.

Impacts on Archeological and Historical Sites

A 1964 study of archeological values in all but the upper 4 miles of the study area revealed a significant number of important sites dating back 8,000 years. As a result, on May 13, 1976, the Washington and Idaho sides of the river were listed in the National Register of Historic Places as the Snake River Archeological District.

Designation of the river and adjoining lands in the National System would encompass those sites and would afford a greater degree of protection than presently exists. Protection would be achieved by limitations on the number of users and location and kinds of use. In addition, more intensive management of the area, including regular patrols by Forest Service and/or state/county personnel, would help to protect sites. Through public education programs, including handouts and interpretive exhibits, visitors to the area would be apprised of the archeological values and enlisted to help in their protection. Efforts would be made to protect sites which are located on privately owned lands through cooperative agreements or easements. Those sites are not now protected by law.

A plan for the future management and development of the area will be coordinated with the appropriate State Historic Preservation Officers. In addition, the Advisory Council on Historic Preservation will be afforded an opportunity to comment on those plans prior to implementation pursuant to Section 106 of the National Historic Preservation Act and Executive Order 11593 in accordance with the "Procedures for the Protection of Historic and Cultural Properties" (36 CFR 800).

The overall impact would result in significantly more protection of historic and archeological values within the area.

Impacts on Transportation

A major impact on transportation would be to alleviate the present congestion on the county road that parallels the river on the Washington side during summer weekends and holidays, caused by a virtual lack of off-road parking. Under the recommended plan, a minor additional amount of off-road parking located between the road and the river would be developed. The amount needed will be determined when a recreational carrying capacity study is made. In addition, there would be a patrol of the county road on summer weekends and holidays to prevent roadside parking and otherwise alleviate traffic problems. The costs of developing and maintaining roads and parking areas would be borne by the administering agency or agencies.

Recreational use of the river by boaters, fishermen, swimmers, etc., may take priority over barge traffic on the river, such as may occur if the limestone deposits were mined. The weekly mail delivery would not be affected.

With construction of a dam at Asotin foreclosed, the opportunity to provide year-around navigation along the 33 miles would be lost. The study segment presently is navigable to a limited degree only 9 months of the year.

The Corps of Engineers' existing authorities to maintain a navigational channel throughout the study segment would continue in effect.

IV. MITIGATING MEASURES INCLUDED IN THE PROPOSED ACTION

The Forest Service will prepare a detailed management plan for the upper 11 miles of the river, and the States of Idaho and Washington and/or Asotin and Nez Perce Counties will prepare a plan for the lower 22 miles. Those plans will define lateral boundaries and specify how the river environment will be protected. The following actions will be included in the plans to mitigate adverse effects:

1. Studies will be made to determine what amount of recreation use (carrying capacity) and kinds of recreation use are in keeping with protecting the river environment and assuring a continued high quality recreation experience. Recreation use of the river will then be managed accordingly.

2. Additional comfort stations will be spotted along the river at campsites and public use areas to avoid the likelihood of water pollution.

3. Areas of historical or archeological importance will be identified and treated in accordance with the Procedures of the Advisory Council on Historic Preservation (36 CFR 800) and Executive Order 11593.

4. Care will be taken in locating and designing campsites and public use areas so as not to create or aggravate erosion problems. Areas of stable ground cover and soil composition will be sought.

5. There are possible threatened or endangered plant and wildlife species in the study area. Special efforts will be made to identify sites or areas harboring such species. Recreation use of the river will then be managed for their protection.

6. The management agencies will encourage the public to carry out litter. The agencies also will retrieve litter as needed.

7. Open fires are a hazard for two reasons. They may get out of hand, and they require the use of native wood which is in short supply. Fires will be permitted only where and when conditions are safe and where there is an ample supply of wood at hand.

8. To relieve traffic congestion on the road extending south along the Washington side of the river from Asotin, two additional off-road parking areas will be provided for river users. At the present time, river users have no place to park except along the shoulder of the road, resulting in congestion, especially on holidays and weekends. The amount of off-road parking will be correlated with the carrying capacity of the river area.

9. Whenever possible, local zoning will be employed to protect the river environment. Where necessary, scenic easements will be

acquired. Scenic easements permit lands to remain in private ownership and the occupants to continue their residence. The lands also remain on the county tax rolls. Where fee acquisition is required, such as to provide parking areas and access points, the amount of land needed will be held to a minimum. Of the 4,080 acres of privately owned land within the proposed boundaries, only an estimated 108 acres may be needed in fee. All or most of the existing uses of lands adjoining the river, such as for agricultural purposes, would continue. When lands or interests in lands are acquired by the Forest Service, payments can be extended over a period of up to 4 years thereby enabling the private owners to realize any tax advantages which may be possible.

10. Residents along the upper 11 miles of the river administered by the Forest Service whose properties are acquired by the Forest Service may retain for themselves and their successors the right of use and occupancy for noncommercial residential purposes for a period of their choice not to exceed 25 years, or the owners may instead choose a right of use and occupancy for the remainder of their lives and that of their spouses.

11. All existing rights to the use of water, whether within the study segment or upstream from the study segment, would remain in effect. The recommended plan reaffirms the exemption from any flow requirements as contained in the Act which established the Hells Canyon National Recreation Area (P. L. 94-199).

12. Financial assistance may be available to local law enforcement agencies. Under the Sisk Act (85 Stat. 303; 16 U.S.C. 551a), the Forest Service has authority to reimburse local agencies for the costs of enforcement performed on lands administered by that Service. Although the States of Washington and Idaho have not made a practice of reimbursing local law enforcement agencies, precedence exists in that assistance has been provided by Washington in connection with Ocean Beach State Parks in Grays Harbor and Pacific Counties, and by Idaho in connection with Lucky Peak Recreation Area.

V. ANY ADVERSE EFFECTS WHICH CANNOT BE AVOIDED SHOULD THE PROPOSAL BE IMPLEMENTED

Because recreation use of the area would be managed so as not to exceed the recreation carrying capacity, rather than being permitted to increase without limitation, there may be less local economic growth in the long run than would occur if the proposal were not implemented.

One important adverse impact would be the possible acquisition of scenic easements (as much as about 4,000 acres), as well as the acquisition of a limited amount of privately owned land in fee (108 acres). Scenic easements would place restrictions on the ways in which lands could be used. There would also be a loss in tax revenue of as much as \$9,000 to the local counties.

Mining of the limestone deposits and other minerals, while possible, would have to be performed in ways that would not unduly impair the river environment. This could result in an unknown amount of increased costs of extraction and transportation.

The construction of access sites, parking, and other public use facilities will result in some unavoidable disturbance of soils and vegetation. However, this disturbance probably would involve no more than 108 acres and, overall, result in less impact than could be expected to occur as a result of unmanaged recreational use of the area if the recommended plan were not carried out.

Designation of the river area would preclude construction of a dam or other major water development on or adversely affecting the 33 miles of river. All economic advantages resulting from any such developments would be lost, as discussed in Chapter VIII under Alternative One, Option Two.

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

Adoption of the recommended plan will serve to protect the river environment from man-caused degradation, excepting changes caused by upstream manipulation of flows, while permitting natural changes to occur. Retention of the scenic and recreational qualities and agricultural uses of the river corridor will take precedence over the short-term development and use of the area which may result if the recommended plan were not adopted. Such short-term uses as increased recreation use of the river beyond its capacity, and the conversion of agricultural lands to residential subdivisions and other types of development on the lands adjoining the river, which are incompatible with protecting the natural river environment would not occur. In summary, the short-term uses which may impair the existing environmental quality of the area will be foregone in favor of the long-term objective of preserving the natural river environment.

VII. ANY IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

Protection of the 33-mile segment of the Snake River by Federal and State agencies and by its inclusion in the National Wild and Scenic Rivers System will be a commitment to retain the natural river environment indefinitely. It will not be an irreversible or irretrievable action, however, since the area would not be altered and existing opportunities for water resource development or other management options would remain. Should Congress later decide that it is in the national interest to assign some other use of the area, this could be accomplished through legislative action.

VIII. ALTERNATIVES TO THE PROPOSED ACTION

Three alternatives to the proposed action of adding the entire 33-mile study segment to the National Wild and Scenic Rivers System, as described in Chapters I and III, are discussed in this chapter. The proposed action (recommended plan) and the three alternatives are displayed in Table 10 at the end of this chapter.

The three alternatives are:

Alternative 1. Addition of none of the 33-mile study segment to the National System.

Alternative 2. Addition of the upper 11 miles upstream from the Grande Ronde to the National System.

Alternative 3. Addition of the 4 miles already within the Hells Canyon National Recreation Area to the National System.

Alternative 1. Addition of none of the 33-mile study segment to the National System

Under this alternative, there are two probable courses of action or options. Either the existing situation and present trends will continue (Option 1), or Asotin Dam will be built and the local economy and life-style will be drastically changed (Option 2). Since each option appears to be about equally probable, both are discussed.

Option 1. Continuation of Present Trends

The study area and most of the countryside surrounding it are still in an undeveloped and environmentally intact condition. The river is free flowing and, except for occasional ranch, farm, and vacation dwellings and the road on the Washington side, the riverfront shows little evidence of man. The towns of Asotin, Clarkston, and Lewiston, downstream (north) from the study segment, have a combined population of about 37,000. Many of the residents work in lumber and wood products manufacturing, operate farms and ranches, or provide recreationoriented goods and services. With completion of Lower Granite Lock and Dam on the Snake River in 1975, Lewiston and Clarkston became inland ports and distribution centers. The economy and population are predicted to continue growing at a slow but steady rate.

Although most of the riverfront is undeveloped and both Asotin and Nez Perce Counties employ protective zoning, 41 miles (71 percent) of frontage along the 29 miles downstream from the NRA are in private ownership. Key portions of those lands have been or are being subdivided and sold for residential purposes. The frontage downstream from the Grande Ronde on both sides is especially vulnerable to such development. Unless special measures are taken to stop this development, in time more and more residences will spring up to the detriment of recreational, agricultural, scenic, scientific, and wildlife values.

Under this option, the two counties would continue to play the dominant role in the area, including enforcement of zoning regulations, and to bear responsibility for meeting most public recreation needs, such as litter cleanup, search and rescue, and law enforcement.

Federal and State agencies would continue to maintain a low profile. The 8 miles of federally owned lands (mostly BLM) and 9 miles of Stateowned land (mostly fish and game departments) would largely remain undeveloped. Federal and State regulatory agencies would continue to protect water quality, environmental quality, and endangered species. Other Federal and State agencies would continue to encourage residential and small business developments.

The States of Washington, Oregon, and Idaho would continue to push forward their efforts to restore anadromous fish runs in the river system.

Recreation use of the river would continue to increase at an anticipated rate of about 20 percent annually with few or no restraints on the amount and type of use other than the restraints which result from the overcrowding of available parking spots, campsites, and water surface.

Much of the increasing use in future years would emanate from the several large marinas under construction on the river immediately downstream from the study segment at Asotin, Clarkston, and Lewiston. Those marinas will have a combined capacity of 800 boats upon completion. Recreation use along the Washington side by way of the road which extends along the river between Asotin and the Grande Ronde also would likely increase, but to a lesser degree because of the very limited parking and access. Trespass across private land would be a growing problem, as would the disturbance and vandalism of archeological and historical sites and increased harassment and fishing and hunting pressure on fish and wildlife populations. Conflicts among river users would likely develop, such as could be expected to occur between power boaters, water skiers, fishermen, waterfowl hunters, and swimmers.

Because of concern about increased vandalism of the important archeological sites along the river, it is possible those sites will be added to the existing Nez Perce National Historical Park. That park comprises 23 historical sites scattered over approximately 7,000 square miles of northern Idaho nearby the Snake River study segment. See Map 11. They preserve the history and culture of the Nez Perce Indians and the people who followed them--explorers, fur traders, missionaries, soldiers, settlers, gold miners, loggers, and farmers. The National



Park Service actively protects and interprets the sites. If additional archeological sites were added to the National Historical Park, there would be an insignificant effect on existing uses along the river, and on the local economy or governments. Implementation would require Federal enabling legislation.

Option 2. Maximum Economic Development

Under this option, the construction of Asotin Dam and the likely development of limestone deposits would occur (see Map 12), resulting in a major transformation of the study area and surrounding region. In place of an area which is relatively undeveloped and environmentally intact, the character of the area would become one of intensive development and use.

On April 12, 1979, the Pacific Northwest Generating Company (PNGC) filed an application with the Federal Energy Regulatory Commission for a preliminary permit to study the feasibility of constructing a dam at the Asotin site. The PNGC is a cooperative generating utility with 17 distribution cooperative utility members. PNGC anticipates the need for the quantity of power Aostin Dam would produce in meeting the projected power needs of its member cooperatives during the 1990's and beyond.

Electrical power has been in abundant supply in the Pacific Northwest. However, that situation is changing and a power deficit is predicted in future years as illustrated in Table 9. Such a power deficit will increase the demand to realize the power potential represented by Asotin Dam. The power an Asotin Dam could provide would be 22 percent of the deficit expected during the 1988-89 operating year and 2 percent in 1998-99 by which time other new power sources are planned to be in operation.



	Defi	cit
Operating Year	Peak (MW)	Energy (MW avg.)
1979-80	254	1,599
1980-81	1,359	2,214
1981-82	846	1,998
1982-83	2,514	2,499
1983-84	345	2,835
1984-85	1,484	2,511
1985-86	712	2,018
1986-87	(432)	1,162
1987-88	(544)	1,916
1988-89	(195)	1,034
1989-90	282	1,020
1990-91	2,155	1,751
1991-92	3,986	2,713
1992-93	5,974	3,725
1993-94	8,006	4,768
1994-95	10,100	5,856
1995-96	12,312	6,974
1996-97	14,485	8,039
1997-98	16,687	9,189
1998-99	19,044	10,342

Table 9. <u>Régional Power Supply Déficits</u> (1979-80 West Group Forecast)

PNGC is also considering other possible sources of electricity in meeting its projected needs, including nuclear and coal-fired generation, but the preliminary finding is that the economics clearly favor an Asotin Dam.

In an August 1979 analysis commissioned by PNGC, the economics of constructing Asotin Dam were evaluated. Based on a dam that would be located at river mile 146.5 (one-half mile upstream from Asotin) and have a pool elevation of 842.5 feet, there would be an installed electrical capacity of 400 megawatts and a dependable capacity of 230 megawatts. The annual value of power produced would be \$87 million (1980 dollars).

During construction of the dam, an average of 950 employees would be utilized, resulting in salaries of \$28.2 million annually (1979 dollars). The influx of workers would result in a population increase of from 900 to 1,475 workers which would require up to 475 housing units.

Once the dam is completed, a staff of 28 employees would be required to operate the facility and they would receive \$606,000 annually in salaries (1979 dollars).

Operation of the dam would generate secondary employment and income locally. For every new job created by the dam, an additional 2.1 jobs would be created, and for every dollar spent on the dam, an additional \$2.5 would be generated. Applying those multipliers, operation of Asotin Dam should increase total employment by 87 and increase local income by \$1.1 million (1979 dollars).

County tax revenues generated by the dam project would be considerable. They are estimated to be \$18.8 million (1979 dollars).

Asotin Dam would have a significant potential for recreation use. In 1963, the National Park Service estimated that recreation use of the reservoir behind the dam would be 30,000 visitor days annually. The estimate was made in connection with an Asotin Dam proposal by the Corps of Engineers similar in design to the one of the Pacific Northwest Generating Company.

If a navigational lock at Asotin Dam were constructed requiring an investment of \$70 million (1979 dollars) and costing \$5.2 million to operate annually, slack water navigation would be extended up the Snake well beyond the location of the limestone deposits near river mile 170 and permit year-around barging downstream to the Lewiston-Clarkston area for processing and shipment by barge or rail to outside markets. Washington Water Power Company, owner of the limestone deposit on the Idaho side, reports that the limestone has many commercial uses and if it were possible to barge the limestone out, an associated firm would propose a \$60 million processing facility to be located in the Lewiston-Clarkston area which would employ 100 people at plant site. In addition, Washington Water Power is interested in developing the deposit for use in a planned large thermal power plant for use in scrubbers for cleaning up flue gasses.

Weighed against the substantial benefits which would result from the construction of Asotin Dam are significant environmental and sociological consequences. Twenty-eight miles of free-flowing river, 3,900 acres of land, 30 miles of county roads, and dozens of important archeological sites would be inundated. Over 25 residences would have to be relocated. Lost from production would be 200 acres of cultivated farmland and 3,700 acres of range essential to 10 farm or ranch operations and critical to deer, chukar partridge, and other wildlife species.

Based on studies by the Columbia River Fisheries Council and the Idaho Department of Fish and Game, construction of Asotin Dam would all but eliminate the remaining anadromous fish runs upstream from Asotin. For 1978, they estimate that adult anadromous fish produced from the spawning escapement upstream from Asotin was over 120,000 fish. This rather low production reflects the as yet unmitigated losses due largely to the construction and operation of hydroelectic dams in the Columbia and Snake Rivers. This production is only a small fraction of the more than 700,000 fish which the fishery agencies are planning to produce from this area barring the construction of Asotin Dam. With reasonable improvements in fish passage at the dams, 60 to 80 percent of the 700,000 fish produced could be harvested in the commercial and sport fisheries of Oregon, Idaho, and Washington.

In addition to anadromous fish, some resident species will be adversely affected, most notably the white sturgeon which has exhibited a definite preference for flowing water. Studies by Idaho show the white sturgeon utilizes flowing water areas for spawning and that its food habits and needs are adapted to feeding on benthic organisms which are generally more abundant in the flowing portions of the Snake than in impoundments. According to the Idaho Department of Fish and Game, inundation of the 28 miles of river by Asotin Dam would essentially eliminate the white sturgeon population there.

There would be a conversion of recreation opportunities from the kinds possible along the free-flowing river to those associated with a large reservoir. While Asotin Dam would create opportunities for a significant amount of flat water recreation (estimated to be 30,000 visitordays), it would displace the 97,000 days of use presently being made of the free-flowing river area along the study segment. Over 140 miles of the Snake River from its mouth to Asotin is already available for flatwater recreation. The 1972 report entitled <u>Recreation Use Survey</u>, <u>Asotin Dam Impact Area</u> by Holubetz and Simons, states that there is a strong public preference for the types of recreation available along free-flowing sections of the Snake River over the recreation available along impounded sections. The influx of new population occasioned by the construction and later operation of Asotin Dam would result in increased expenditures for additional police, fire, school, and other required county and city services. The impact would be greatest during construction.

Alternative 2. Upper 11 miles added to National System under Forest Service Administration

The 11-mile segment upstream from the Grande Ronde is the most scenic portion of the 33-mile study area and the lowermost reach of Hells Canyon. Downstream, the flow of the river is wider and slower and the canyon much broader. Most parties floating down the Snake debark at the Grande Ronde. Much of the upriver power boat traffic--those boats that are not designed or powered to challenge the rapids farther up--stop at the Grande Ronde.

Under Alternative 2, the 11 miles would be added by Congress to the 67 miles immediately upstream which are already included in the Wild and Scenic Rivers System under Forest Service administration as part of the Hells Canyon National Recreation Area (See Map 13).

Designation of the 11 miles would incur the acquisition of scenic easements on as much as 1,568 acres of lands in private ownership fronting the 7 miles downstream from the National Recreation Area. Those 7 miles include 118 ownerships and 24 residences, including 10 residences at Rogersburg. Four of the ownerships are agricultural operations; most of the balance are vacation homes. The scenic easements would not affect existing developments and uses but would limit additional residential and other kinds of development and use which would be disruptive of scenic and environmental values.

The impact on local governments, other than the loss of approximately \$3,000 in tax revenues, would be almost nil since virtually all of the funds utilized by Asotin and Nez Perce Counties in refuge pickup and other services occurs downstream from the Grande Ronde where the majority of public recreation use occurs.

Agricultural uses along the 11 miles would continue, and special efforts would be taken by the Forest Service to manage and protect scenic, recreational, historical, and archeological values, as well as endangered species.

In its management of the area, the Forest Service would regulate the kinds and amount of recreation use consistent with protecting the river environment and the quality of experience. This would primarily affect the number of boats permitted above the Grande Ronde. The Forest Service would likely locate a guard station and public use facilities near the mouth of the Grande Ronde.



Costs, as detailed in Chapter I, <u>Recommended River Plan</u>, would be \$1,351,200 for acquisition, \$150,000 for development, and \$30,000 annually for operation and maintenance.

Although no dam or other water developments could be constructed which would impact on the upper 11 miles, water developments affecting the downstream 22 miles would not be ruled out. A low Asotin Dam built at a pool elevation of 818 feet would flood to the Grande Ronde and have an installed capacity of 472 megawatts and dependable capacity of 184 megawatts. Development of the large limestone deposits located one-half mile upstream from the Grande Ronde could have an adverse impact on scenic and environmental values. If necessary, easements to adequately safeguard scenic and environmental values, would be purchased from the owners specifying any additional measures needed during and after development not already provided for in existing Federal and State statutes and regulations. Although the limestone deposits occur one-half mile upstream from the maximum pool of a low Asotin Dam, year-around barging of the mined limestone appears possible with construction of the dam.

See Table 10 for a more detailed analysis of the impact of this alternative.

Alternative 3. Upper 4 miles added to National System under Forest Service Administration

Establishment by Congress in 1975 of the Hells Canyon National Recreation Area extended Forest Service jurisdiction from the boundary of the Wallowa-Whitman National Forest, north (downstream) 4 miles to the Oregon-Washington state line. See Map 14. The Act establishing the National Recreation Area also added a portion of the Snake to the National Wild and Scenic Rivers System. That portion, however, stops at the National Forest boundary. The downstream 4 miles between the National Forest boundary and the state line, although in the National Recreation Area, are not a part of the National Wild and Scenic Rivers System.

Under Alternative 3, the 4 miles would be added by Congress to the 67-mile segment upstream that is already in the National Wild and Scenic Rivers System. No additional protection would be provided for the 29 miles downstream.

Designation of the 4 miles would not preclude construction of a dam at Asotin with a pool elevation of 842.5 feet as contemplated by the Pacific Northwest Generating Company, or affect the extraction of limestone from the deposits located near the Grande Ronde.

The effect would be to direct the Forest Service to manage the 4 miles in a manner consistent with the provisions of the Wild and Scenic Rivers Act, as well as the Act establishing the National Recreation



Area. The Forest Service reports that, because the Wild and Scenic Rivers Act is more restrictive than the National Recreation Area Act, it is more certain that scenic easements would be acquired to guarantee the protection of privately owned lands adjoining the river. Otherwise, the Forest Service plans for the National Recreation Area would remain essentially unchanged.

Table 10. Comparison of Recommended Plan and Alternatives

	14016 10. <u></u>	RECOMMENDED PLAN	ALTERNATIV None of 33-mile study segm Wild and Scenic	E ONE ent added to the National Rivers System	ALTERNATIVE TWO	ALTERNATIVE THREE
	<u>Component</u>	to the National Wild and Scenic Rivers System	Continuation of Existing Situation	Option Two: Full Resource Development	the National Wild and Scenic Rivers System	the National Wild and Scenic Rivers System
	National Economi	<u>c Development</u> :				
	Hydroelectric generation	None	None	Construction of high (842') Asotin Dam would result in a dependable capacity of 230 MM $\frac{1}{2}$	Possible construction of low (818') Asotin Dam and a de- pendable capacity of 18ª MW energy.2	Similar to Alternative 1.
	Flood control	None	None	None. As presently designed, Asotin Dam would be run-of-river without flood control potential. \underline{J}	None	None
	Irrigation	Kone	Noné	None. As presently designed, Asotin Dam would be run-of-river without irrigation potential, $\underline{1}/$	None	None
	Grazin <u>g3</u> /	Existing (1978) use of 475 AUM would continue.	Some loss of existing use as range lands are developed for other purposes,	Loss of 175 AHM,	Loss of 75 AUM 1f low Asotin Nam is built.	Similar to Alternative 1.
	Timber production	The study area contains no commercial timber.	The study area contains no commercial timber,	The study area contains no commercial timber.	None	None
	Mining	Mining on Federal land would be regu- lated to protect river environment. Possible acquisition of easements to protect scenic values on privately owned lands may increase difficulty of mining.	Present trends will con- tinue.	Construction of Asotin Dam would facilitate year-around barging of lumestome from deposits containing 5.5 bil- lion tons of limestone. A portion of the limestone deposits may be inundated.	None, unless low Asotin Dam is built and then year-around barg- ing of limestone would be pos- sible.	Similar to Alternative 1.
92	Recreation	Recreation use could be expected to increase at a rate of 25 percent annually until recreation carrying capacity is reached. Recreation quality would be maintained. Manage- ment of recreation would result in some loss of freedom of choice. The level of recreation use in 1979 was estimated to he:	Recreation use would con- tinue to increase at the current rate of 20 percent annually. A gradual loss in the quality of recrea- tion experience would re- sult as lands are developed.	Creation of the kinds of recreation opportunities associated with a large res- ervoir. The level of recre- ation use is estimated at 30,000 recreation days an- nually L/ Loss of the kinds of recreation associated with the 29 miles of free-flowing	Similar to Recommended Plan for the upper 11 miles and Alter- native 1 for the lower 22 miles.	Sfmflar to Alternative I.
		Floatboating25,000 recreation daysPowerboating15,000 recreation daysFishing5,000 recreation daysHunting2,000 recreation daysOther50,000 recreation daysTotal97,000 recreation days		river that would be mundated		
	Fish production4/	Current plans to restore anadromous fish runs would go forward. Expected numbers of fish migrating upstream past Asotin when all mitigation is successfully completed. Resident fish populations would continue at present levels.	Similar to Recommended Plan,	Creation of a flat-water fishery. Elimination of anadromous fish runs upstream from Asotin. Elimination of white sturneon along the in- undated segment of river.	Similar to Alternative I. n	Simílar to Alternative I.
		Spring chinook 292,000 Summer chinook 218,000 Fall chinook 30,000 Steelheed 143,000 Sockeye 30,000 Total 713,000				
	Wildlife production	Wildlife populations, chiefly deer, chukar, and waterfowl, would be managed to optinum numbers by State game departments,	Wildlife production would be adversely affected by the development of river- front lands.	Loss of 2,500 acres of wild- life habitat, including critical deer winter range.	None, unless a low Asotin Dam is built and then the loss of 2,000 acres of wildlife habi- tat.	Similar to Alternative 1.

	<u>Component</u>	<u>RECOMMENDED PLAN</u> Entire 33-mile study segment added to the National Wild and Scenic Rivers System	ALTERNATI None of 33-mile study sen Wild and Scent Option One: Continuation of Existing Situation	<u>vE OME</u> ment added to the National c Rivers System <u>Option Two:</u> Full Resource Development	<u>ALTERNATIVE TWO</u> Upstream 11 miles only added to the National Wild and Scenic <u>Rivers System</u>	ALTERNATIVE THREE Upstream 4 miles only added to the National Wild and Scenic Rivers System	
	<u>Costs</u> :						
	Land acquisition	Land Easements (3,972 acres) \$3,059,200 Acquisition Fee (108 acres) 148,800 Total (1979 dollars) 33,208,009 Note: The above costs would be re- duced to the extent that county zonin would protect land from adverse de- velopment.	Some lands may be acquired by the counties and States for public recreation or wildlife purposes. g	3,900 acres would be inun- dated by the waters of Asothn Dam. The cost of acquiring the 3,000 acres is unknown.	For upper 11 miles: Easements (1,569 acres) \$1,342,400 Fee (8 acres) 8,800 Total <u>\$1,3561,200</u>	Similar to Alternative 1.	
					Note: The above costs would be reduced to the extent that county zoning would protect land from adverse development.		
	Capital develop- ment (con- struction)	\$350,000 (1979 dollars)	A minor additional amount of public use facilities along river may be provided by counties.	The 1909 capital installed cost of constructing Asotin Dam is estimated to be \$834,494,000,14	For upper 11 miles, \$150,000 (1979 dollars), Similar to Alternative 1 for lower 22 miles.	Similar to Alternative 1.	
	Annual operation and mainten- ance (1979 dollars)	\$110,000	Costs of operating and main- taining public use facili- ties would increase slowly as recreation use increases,	\$9,421,000	\$30,099 for the upper 1] miles, Similar to Alternative 1 for the lower 22 miles.	Similar to Alternative I.	
	<u>Enviropmental</u> Qu	ality:					
	Water quality	Existing Federal and State standards would continue in effect.	Existing Federal and State standards would continue in effect.	Existing Federal and State standards would continue in effect.	Existing Federal and State standards would continue in effect.	Existing Federal and State standards would continue in effect.	
	Scenic values	More intensive management would result in the maximum protection and maintenance of existing scenic values,	The scenic value of open space lost to the extent that riverfront lands con- tinue to be developed,	Construction of Asotin Dam and extraction of linestone would drastically impair ex- isting scenic qualities.	Similar to Recommended Plan for the 11 miles. Similar to Alternative 1 for the 22 miles.	Similar to Alternative 1.	
93	Recreation values	More intensive management would re- sult in the maximum protection of recreation values associated with a free-flowing river and the quality of the recreation experience in- cluding determination and enforce- ment of a recreation carrying canacity.	Recreation values may dete- riorate as riverfront lands are developed.	Loss of recreation values associated with the loss of 29 miles of free-flowing river,	Similar to Recommended Plan for upper 11 miles and Alter- native 1 for lower 22 miles.	Similar to Alternative I.	
	Scientific Values	Special management efforts would be taken to protect and interpret geologic and other scientific features including endangered and threatened species.	Scientific features may be damaged as lands are de- veloped or as unmanaged recreation use occurs.	All scientific features be- low the 842.5-foot eleva- tion would be inundated.	Similar to Recommended Plan for upper 11 miles and Alter- native 1 for lower 22 miles,	Similar to Alternative 1.	
	Regional Development:						
	New employment	New employment of three to staff 33- mile Wild and Scenic River.	Present trends would con- tinue.	Employment of 900-1,000 dur- ing construction of Asotin Dam and 28 to operate the completed dam,	New employment of one to staff the upper 11 miles. Similar to Alternative 1 on lower 22 miles.	Similar to Alternative 1.	
	Personal income	Little change.	Present trends would con- tinue.	Gain of \$29.2 million an- nually in labor nayrolls during the construction of Asotin Dam and \$1.1 million annually in increased local income resulting from opera- tion of the completed dam. ^{2/2}	Similar to Recommended Plan on upner 11 miles and Alter- native 1 on lower 22 miles.	Similar to Alternative I.	
	Local govern- ment expense	To the extent the USFS or State agen- cies assume law enforcement, road maintenance, litter removal, and search and rescue responsibilities now being performed by the countles, county costs will go down.	Costs of law enforcement, road maintenance, litter removal, and search and rescue will gradually in- crease as recreation use increases.	The increased conulation dur- ing and after the construc- tion of Asotin Dam will re- quire unknown but significant local government service costs for schools, law en- forcement, etc.	Similar to Recommended Plan on upper 11 miles and Alter- pative 7 on Tower 22 miles.	Similar to Alternative 1.	

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		RECOMMENDED PLAN Entire 33-mTle study segment added to the National Nild and Scenic Rivers System	ALTERNATIVE ONE None of 33-mile study segment added to the National Mild and Scenic Rivers System		ALTERNATLYE THO	ALTERNATIVE THREE
	<u>Component</u>		Continuation of Existing Situation	Option Two: Full Resource Development	Upstream 11 miles only added to the National Vild and Scenic Rivers System	Upstream 4 miles only added to the National Wild and Scenic Rivers System
	County tax gain/ loss	A county tax loss of \$9,000 would occur, as scenic easements on 3,972 acres are acquired and 108 acres are acquired in fee,2	Present trends would con- tinue.	Construction of Asotin Dam by the private sector would result in K14.9 million an- nual county tax revenues.	A county tax loss of \$3,999 as a result of easements acoutred on the upper 11 miles. Similar to Alternative 1 on lower 22 miles.	Similar to Alternative 1.
	Property values	Property values of adjacent lands would be expected to increase more rapidly with designation than with- out designation.	Present trends would con- tinue.	Property values in the vicin- ity of the dam would be ex- pected to increase signifi- cantly in value.	Similar to Recommended Plan along the upper 11 miles and Alternative 1 along the lower 22 miles.	Similar to Alternative 1.
	Population gain/loss	Population gains would be slowed down because of limits on recreation use and on land development.	Present trends would con- tinue.	An increase in population from 950 to 2,100 during construction of Asotin Ram and 56 to R^{α} after the dam is completed and operating.	Similar to Recommended Plan for upper 11 miles and Alter- native 1 on lower 22 miles.	Similar to Alternative I.
	Transportation/ navigation	Provision of off-road parking would relieve congestion along Asotin County road. Existing authority of Corps of Engineers to maintain navi- gation channel would continue in effect.	Present trends would con- tinue.	Construction of Asotin Nam would enhance naviation and increase the liklihood that the linestone denosits would be developed. Existing county roads would be inun- dated and have to be relo- cated.	Similar to Alternative l.	Similər to Alternətive 1.
	<u>Social Well Bein</u>	8:				
	Cultural values	Special efforts would be taken to protect and interpret the historic and archeological sites.	Present trends will con- tinue.	All historic and archeologi- cal sites below elevation of 842.5 feet would be inun- dated. An archeological salvage program would likely be undertaken before Asotin Dam is completed.	Similar to Recommended Plan for unger 11 miles and Alter- native 1 for lower 22 miles.	Similar to Alternative 1.
94	Public health and safety	More intensive management would re- sult in maximum public health and safety.	Present trends will con- tinue.	A different set of public health and safety conditions would exist on a reservoir than on a free-flowing river.	Similar to Recommended Plan for upper 11 miles and Alter- native 1 for lower 22 miles.	Similar to Alternative 1.
	Change in life style	Existing life style would be con- tinued.	Present trends will con- tinue.	A rapid change in existing life style.	Similar to Recommended Plan on upper 11 miles and Alter- native 1 on lower 22 miles,	Similar to Alternative 1.
	Commitment of resources	There would be a commitment to pro- tect the river environment from man- induced change or degradation. Al- though designation could be reversed by Congress, such reversal is un- likely.	The gradual development of riverfront lands would re- sult in an almost irrever- sible commitment of re- sources.	Construction of Asotin Dam would inneversibly convert 29 miles of free-flowing river into a reservoir.	There would be a commitment to protect the upper 11 miles in their free-flowing condi- tion.	There would be a commitment to protect only the upper 4 miles in their free-flowing condition.

 $\pm 1^{\prime}$ Report dated August 23, 1979, by CH2M for Pacific Northwest Generating Company.

 $\mathcal U$ Corps of Engineers, Walla Walla District.

业 Soil Conservation Service.

 $4\prime$ - Idaho Department of Fish and Game.

5/ Asotin County, Washington, and Nez Perce County, Washington.
IX. CONSULTATION AND COORDINATION WITH OTHERS

<u>Consultation and Goordination in the Development of</u> <u>the Proposal and in the Preparation</u> of the Report/Environmental Statement

The sequence of major steps taken in making the study were as follows:

1. Formation of a multidisciplinary and interagency study team in February 1977 composed of representatives from the following organizations and agencies:

> <u>State of Oregon:</u> Governor's Office Wallowa County Department of Land Conservation and Development Department of Water Resources Oregon State University Department of Fish and Wildlife University of Oregon

State of Washington:

Interagency Committee for Outdoor Recreation Department of Game Department of Natural Resources Department of Ecology Asotin County

State of Idaho:

Department of Parks and Recreation Department of Fish and Game Department of Water Resources Department of Health and Welfare Nez Perce County University of Idaho, Department of Water Resources Research

Private Entities:

Hells Canyon Preservation Council Washington Water Power Company Idaho Power Company

U. S. Government:

Bureau of Land Management Forest Service Fish and Wildlife Service National Park Service National Marine Fisheries Service Corps of Engineers Heritage Conservation and Recreation Service 2. The U. S. Bureau of Mines (Western Field Operations Center, Spokane, Washington) evaluated the mineral potential and mining activity along the study segment. Field work was carried out by a team of three geologists during the 1977 summer. Their findings are summarized in this report.

3. The conduct of a public informational meeting for the purpose of initiating the study. This step was carried out in March 1977. The public meeting was held in Lewiston, Idaho, with approximately 75 in attendance.

4. A field evaluation of the study area by the study team to determine if the study segment meets the criteria contained in the Wild and Scenic Rivers Act and in the <u>Guidelines for Evaluating Wild</u>, <u>Scenic</u>, and <u>Recreational River Areas Proposed for Inclusion in the</u> <u>National Wild and Scenic Rivers System under Section 2, Public Law</u> <u>90-542</u>. In addition, the various options available for the future management and use of the river were tentatively identified. This step was accomplished in May 1977. The study team spent several days on the study segment and concluded that it meets the criteria.

5. The preparation of a brochure summarizing the study team's conclusions concerning the eligibility criteria and outlining the management options that have been identified, followed by a second series of meetings to present this information to the general public and obtain public comment. Those meetings were held in August 1977 at Portland, Oregon; Boise and Lewiston, Idaho; and Spokane, Washington, with a total attendance of about 200.

6. A meeting of the study team was held to discuss the results of the study and to consider public input and reaction obtained from the second series of meetings. Each study team member was requested to indicate his or her management alternative preference should the river be added to the National System, the general location of boundaries, and needed public use facilities. This study team meeting was held in August 1977, immediately following the public meetings. The recommendations of the study team, as well as additional comments in writing resulting from the public meetings, were provided to the Regional Director of the Bureau of Outdoor Recreation in September 1977.

7. A preliminary draft study report, including an environmental statement, was prepared by the Regional Office of the Bureau of Outdoor Recreation and submitted to the members of the study team and to the Interagency Wild and Scenic Rivers Committee in Washington, D. C. That report contains the findings, conclusions, and recommendations of the Regional Director based, in part, on the input from the study team and the public at large. 8. Following review of the preliminary draft report by the study team and by the interagency committee, the report was revised and then forwarded by the Secretary of the Interior to the Governors, Federal agencies, and public for formal review and comment. The date of the draft report was April 1979.

9. On receipt of the formal review comments, the report was further revised and the review comments appended, and then the final report (dated January 1980) was published.

One of the most important elements in the planning and decision-making process of the study, as prescribed by NEPA and by Principles and Standards was public involvement. To help insure such involvement, a public meeting was held in Lewiston, Idaho, at the outset of the study to define the purpose of the study and outline the method of its conduct, to answer questions, and to solicit public comment and involvement. Additional public meetings were held later to inform the public of the study team's finding of eligibility for inclusion in the National Wild and Scenic Rivers System, and to obtain input on possible alternatives for future management and the use of the river. These meetings were in Portland, Oregon; Boise, Idaho; Lewiston, Idaho; and Spokane, Washington. The comments and suggestions offered orally or in writing as a result of the public meetings were given careful consideration in defining management alternatives in selecting the recommended plan.

The views expressed at the public meetings or in writing were about equally divided between those who favored adding all or most of the 33-mile study segment to the National Wild and Scenic River System, and those who opposed such designation. There was general agreement that the area's scenic and recreational attributes are outstanding. Some felt that management by the Forest Service and/or States is needed to protect the special qualities. Others believed that county protection would suffice. The need to protect the important archeological sites was expressed. Still others preferred no specific protective measures so that the area's full development potential might eventually be realized, including construction of a dam or dams for hydroelectric generation, development of rich limestone deposits, and navigational improvement. No real concensus emerged from the meetings.

> <u>Coordination in the Review of the</u> Draft Environmental Statement

Copies of the draft environmental statement were submitted to the following:

Federal Agencies:

Advisory Council on Historic Preservation Department of Agriculture Department of Commerce Department of Defense Corps of Engineers Department of Health, Education, and Welfare Department of Housing and Urban Development Department of Transportation Pacific Northwest River Basins Commission

Clearinghouses:

States of Washington, Oregon, and Idaho

Department of the Interior Water and Power Resources Service Bureau of Indian Affairs Bureau of Land Management Bureau of Mines Fish and Wildlife Service Geological Survey Heritage Conservation and Recreation Service Environmental Protection Agency Department of Energy Bonneville Power Administration Federal Energy Regulatory Commission

APPENDIX 1

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REVIEW COMMENTS

NEIL C. AUSMAN COMMISSIONER, SECOND DISTRICT ASOTIN, WASHINGTON

TONY WEZA COMMISSIONER, FIRST DISTRICT CLARKSTON, WASHINGTON

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P. O. BOX 250 ASOTIN, WASHINGTON 99402 PHONE (509) 243-4165

August 8, 1979

R.E. Dickenson Regional Director National Park Service 601 Fourth and Pike Building Seattle, Washington

Re: Snake Wild and Scenic River Study Draft Report/Environmental Statement

Gentlemen:

We are pleased with the opportunity to comment on the Draft Report of April 1979. We commend the study group for a conscientious effort to accomplish a good study and generally good recommendations on a wide range of alternatives. We are further pleased with the generous attitude in submitting the study report draft to local entities for review and constructive suggestions for changes and amendments.

Under "Classifications", we would suggest changing the point of demarcation from the confluence of the Grande Ronde with the Snake to a point approximately one mile up stream from there. This would mean a proposal of twenty-three miles qualifying for Recreational classification. The additional one mile is, in reality, a continuation of the lower twenty-two in the broadened segment of river development in that it does have permanent residences as well as recreational residences, a road, and in addition an air strip for light aircraft. This would leave ten miles of the studied thirty-three qualifying for scenic classification and twenty-three designated as Recreational.

As a part of the recommended river plan, we note the lateral boundaries on the Washington side are defined as extending "in most places" to the county road. We believe that the study report should define this boundary as either to or including the county road, and then the boundary lines or exact distances be specified where the lateral boundary is to go beyond the county road.

It might be pointed out that should the management alternatives that we prefer fail, and the thirty-three mile stretch come under Forest Service management, the county road would be used about 90% recrea-

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tional, and only 10% as local or non-recreational. Then the question of responsibility for road improvements and maintenance needs to be resolved to place this responsibility upon the managing entity.

In considering the management objectives and alternatives, we would reiterate our choice of County Management. We hasten here to cite the study's implications that Local control is "no" control or that County Management, as we suggest, is subject to yield to local opinion and therefore local pressures. These implications, if not changed to a better tone, would connote the impression that local input should be avoided and the local voice not heard. To this, we strongly object, and therefore urgently suggest that the County Management alternative be given equal consideration along with Federal or State management.

We further believe that County Management is the best guarantee to future generations that options will be open to them. Any compromise from the County Management position should be considered in the realm of State Management in cooperation with the counties.

Sincerely yours,

Asotin County Board of Commissioners

By Tony Weza, Member

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Comments of Asotin County dated August 8, 1979

- 1. The confluence of the Snake and Grande Ronde was selected as the lower terminus of the "scenic" section for several reasons. The character of the river upstream from that point changes: the canyon closes in, the river narrows, and its gradient steepens. Most parties floating the river debark there. It is the logical place for the Forest Service to locate an entrance to the National Recreation Area, including interpretive, public use, and management facilities.
- 2. The report has been revised to clarify this point. Specific location of the boundary would be determined at such time as the administering agency or agencies develop a detailed plan of management and protection.

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Department of Energy Bonneville Power Administration P.O. Box 3621 Portland, Oregon 97208

In reply refer to: AE

August 17, 1979

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Date

Mr. Russell E. Dicke	nson
Regional Director	
Pacific Northwest Re	gion
National Park Servic	e
601 Fourth and Pike	Building
Seattle, Washington	98101

Dear Mr. Dickenson:

Thank you for the opportunity to comment on the draft report/environmental statement concerning the Snake Wild and Scenic River Study. Following are some general observations and specific comments related to portions of the text.

General Observations

Bonneville Power Administration (BPA) has no existing lines or plans in the immediate future for transmission line corridors in the study area. However, long-range studies have identified certain potential transmission corridors which may become critical to move energy from Montana coal fields to load centers in the Pacific Northwest. One of these potential corridors is indicated in yellow on the attached map. In view of the serious energy problems facing this nation and the Administration's emphasis on developing the Nation's coal resources, future utilization of this corridor should not be precluded.

In general the Draft Report does not appear to give adequate consideration to the benefit-cost factors with regard to the potential development of Asotin Dam. References in the Draft Report with regard to the Asotin Dam benefits and costs and the need for its power appear to be outdated.

Specific Comments

The last paragraph on page 65 discusses a dam near Asotin and dismisses its impact with "...would produce a significant amount of electricity and result in important local economic growth." Equating the average annual energy output of 230 megawatts of Asotin as proposed by the PNGC with oil at an estimated \$25/bb1 would result in annual benefits of \$84,000,000 versus an estimated annual cost of about \$35,000,000. Nuclear or coal-fired energy bus-bar costs would range from 40 to 50 mills/kWh or \$80 million to \$100 million to generate the energy available from the Asotin project. Obviously the annual benefits of Asotin of about \$45 million merits more consideration than a cursory one line reference.

Page 71 of the report in the discussion on Alternative Three--Full Resource Development--the statement is made "Although at the present time, neither the construction of a dam or dams or development of the limestone deposits appears feasible..." There is no analysis in the report which supports the contention that a dam or dams are not feasible at this time. Either the Corps of Engineers or PNGC could provide data which supports present-day feasibility.

On this same page the statement is made that "Increasing energy needs could make construction of a dam or dams more attractive." The energy needs are here and now. The PNUCC West Group Forecast indicates energy deficits every year of the next decade based on 13 large thermal plants being completed on time. Six of these plants are not now under construction and are subject to severe delays in their scheduled completion dates thus compounding the deficits already forecast. Obtaining 15 mill energy from a renewable resource is obviously much more attractive than the alternative of using non-renewable resources at 45 mills/ kWh.

Again, we appreciate the opportunity to comment on this draft statement. Should you have any questions, please contact me at FTS: 429-5117.

Sincerely.

Dan W. Schausten Assistant to the Administrator --Intergovernmental Relations

Enclosure: Map 2

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<u>Comments of Bonneville Power Administration</u> <u>dated August 17, 1979</u>

- 1. The report has been revised to include references to the potential corridor which crosses the downstream one-third of the study area.
- 2. The report has been revised to include additional information about the benefits and costs of an Asotin Dam.



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS WASHINGTON, D. C. 20245

IN REPLY REFER TO: Trust Services Wildlife & Parks 459

Memorandum

To: Chairman, Interdepartmental Study Group on Wild and Scenic Rivers

From: Acting Director, Office of Trust Responsibilities

Subject: Draft Report and Draft Environmental Impact Statement on the Proposed Snake National Wild and Scenic River.

We have received a copy of the subject report and a copy of Assistant Secretary Herbst's June 15 letter to the Administrator, Environmental Protection Agency which requested comments on the subject report within 45 days of the date of his letter.

Although our January 23, 1978, memorandum to you, that provided comments concerning the December 1977 Preliminary Draft, did not address "Alternative 5. Noninclusion/Addition to Nez Perce National Historic Park," we feel that it now appropriate to do so. We have noted on Pages 75, 77 and 78 of the April 1979 draft, concerning "Alternative Seven - National Park Service Protects Significant Archeological/Historical Sites" that interest was expressed at the public meetings in protecting only the important archeological sites along the river; that special efforts would be taken by the National Park Service to protect and interpret the sites; and that an estimated 250 acres of privately owned land would need to be acquired. We have noted no indication in the draft that the Nez Perce Tribal Governing Body has been consulted in this matter, nor the status of the private land that would need to be acquired. We recommend that the Tribal Governing Body be consulted prior to any further action on Alternative Seven.

Dand C. Hans

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Comments of Bureau of Indian Affairs dated July 6, 1979

1. The Nez Perce Tribal governing body will be consulted prior to any action that is taken to add archeological/historical sites along the study segment to the existing Nez Perce National Historical Park.

... REPLY REFER TO:



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS PORTLAND AREA OFFICE POST OFFICE BOX 3785 PORTLAND, OREGON 97208



Memorandum

To: Mr. Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

From: Office of the Area Director

Subject: Snake Wild and Scenic River Study, Draft Report/Environmental Statement

The study area is within the Nez Perce Indian treaty ceded area. Nez Perce Indians continue to have hunting and fishing rights in this area.

We suggest that the following additional paragraph be placed at the end of 1 the "history" section on page 47.

"The location of the study area is within the 1855 Nez Perce treaty ceded area. Article 3, second paragraph concerned with hunting and fishing rights states as follows:

'The exclusive right of taking fish in all the streams where running through or bordering said reservation is further secured to said Indians, as also the right of taking fish at all usual and accustomed places in common with citizens of the Territory; and of erecting temporary buildings for curing, together with the privilege of hunting, gathering roots and berries, and pasturing their horses and cattle upon open and unclaimed land.'

These rights continue to exist and must be considered in management of the Hells Canyon area."

Uly Assitstant Area Director (Economic Development)

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Comments of Bureau of Indian Affairs dated August 17, 1979

1. The report has been revised as suggested.

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT Idaho State Office Federal Building, Box 042 550 W. Fort Street Boise, Idaho 83724

August 10, 1979

Mr. Russell E. Dickenson Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, WA 98101

Dear Sir:

In response to your request we furnish the following comments of the Snake Wild and Scenic River Study Draft Report Environmental Statement (DES 79-35).

We feel that some mention of Section 202 Federal Land Policy and Management Act (43 USC 1712) and Section 6, Forest and Rangeland Renewable 1 Resources Planning Act (16 USC 1604) should be made in Section I.C. of the DEIS. These two Acts require BLM and FS to coordinate land use planning with other Federal agencies (including each other) as well as State and local governments and Indian tribes. These references would provide latitude for deferring some decision making until more appropriate times. We cite the following examples. The subject document indicates BLM will transfer 680 acres to FS administration (Page 10). No such decision has been made yet. The document also refers to the administering agency or agencies evaluating recreational carrying capacity on the upper 11 miles and lower 22 miles and develop management plans (Page 10). The Bureau is concerned that lack of full coordination may result in failure to recognize the use on this stretch of river originating from the lower reach of the Salmon River. The allocation of use must recognize the use originating on the Salmon River.

The reference to BLM on page 19 contains a tense inconsistency. The last 2 sentence should read: "These plans recognize...."

Tables 4 and 5 on pages 38 and 39 list 0 miles of river frontage and 0 acres of land in federal ownership within the river corridor from the NRA boundary to a station on the Idaho side. The BLM administers approximately 3 miles of frontage and 680 acres in the corridor. The DES later mentions that "the BLM can be expected to maintain the natural character of river frontage along the eight miles of river under its jurisdiction" (page 53).

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Save Energy and You Serve America!

On page 51, the USFS estimate of Snake River use from boaters from the Salmon River was 600 user days. Use data compiled from the BLM river program shows that in 1977, 1,237 users floated the Salmon River. The vast majority of these users utilized the takeout at the Grande Ronde, and many of them camp at least one night on the Snake. Therefore, the actual number of user days is at least double the estimated use in the recommended alternative #1. This use is extremely significant and must be considered in any recreation management plan or use allocation.

The Bureau is currently developing a Habitat Management Plan in cooperation with the Idaho Department of Fish and Game and the Idaho Department of Lands on the Craig Mountain Wildlife Area. Approximately 6 miles of river frontage is included in this area. The primary goals for management of this area are enhancement and maintenance of wildlife habitat. It appears that the recommendation in the DES does not conflict with the wildlife area. However, Idaho Fish and Game should be contacted in reference to their policy for plan development in this area.

Finally, reference should be made to the land-use planning the Cottonwood office is currently engaged in for the lands included in the study segment of the river. The proposed actions should be processed through the Bureau planning system for analysis. Such an analysis will consider other resource values and potential conflicts. To date this office has not been contacted for their input.

Thank you for the opportunity to provide input into the environmental process.

Sincerely yours,

Lorn Jallow

Lorin J. Welker Acting State Director

cc: Director (202) Director (420)

Comments of Bureau of Land Management, Idaho State Office dated August 10, 1979

- 1. Consolidated administration of all Federal lands under the Forest Service would achieve a more efficient and a more cost effective result than the present split administration.
- 2. The report has been revised as suggested.
- 3. According to the Nez Perce County, Idaho, land records, the report is correct.
- 4. The report has been revised to include more up-to-date recreation use data.

IN REPLY REFER TO:



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

Memorandum

To: Russell E. Dickenson Regional Director National Park Service 601 Fourth and Pike Bldg. Seattle, Washington 98101

From: State Director

Subject: Draft EIS for Snake Wild and Scenic River Study, DES 7

We have reviewed the draft report and environmental impact statement for the proposed Snake Wild and Scenic River Study. The following comments are provided for your consideration when preparing the final document.

General Comments

It was difficult to evaluate the proposal because of the imprecise description of the proposed action. While the principal proposal is to designate the indicated section of the Snake River as wild and scenic, the DES did not indicate with any detail what this would entail in terms of management or what the impacts would be.

Of concern is the heavy influx of recreational users which could have extensive influence on riparian areas. The riparian habitat is limited by topography and climate. The already heavy use is predicted to increase, but little discussion was included on possible impacts on the riparian areas and on the wildlife utilizing those areas.

If designation would maintain the river for access to anadromous fish, then the proposal would correlate well with BLM efforts to preserve and enhance runs of anadromous fish. This portion of the Snake is vital for the access of the much-reduced salmon and steelhead runs utilizing streams on public lands in northeast Oregon and southeast Washington. To the extent the proposed action would benefit these runs, it is supportive of current BLM fisheries management goals in these areas.

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Specific Comments

Page 37, Land Ownership Map. The map shows a very large segment of land on the west side of the river, in Oregon, within the Wallowa-Whitman National Forest as being administered by the B.L.M. This is incorrect; this land should be shown as being administered by the Forest Service.

Marthe Commence

cc: W.O. (202-B)

Comments of Bureau of Land Management, Oregon State Office dated August 10, 1979

- 1. The report has been revised to clarify the description of the proposed action.
- 2. The report has been revised as suggested.



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF MINES 2401 E STREET, NW. WASHINGTON, D.C. 20241

July 24, 1979 DES-79-35

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Memorandum

To: Chief, Office of Park Planning and Environmental Quality, National Park Service

From: Chief, Office of Environmental Coordination

Subject: Draft report and environmental statement, Snake Wild and Scenic River Study, Oregon, Idaho, and Washington

The study recommends Federal and State actions be taken to add a 33-mile segment of the Snake River bordering the States of Washington, Idaho, and Oregon to the National Wild and Scenic Rivers System. Nine alternatives were considered. The proposed action, Alternative 1, recommends the 22 miles below the Grande Ronde River confluence be classified as recreational and the 11 miles above as scenic. The 11-mile-segment would be added to the 67 miles upstream that are already in the National Wild and Scenic Rivers System and administered by the Forest Service. The lower 22 miles has been recommended for possible joint administration by Idaho and Washington. The States could, for their administrative portion, seek the national designation by the Secretary of the Interior.

The document includes data on minerals that occur within the boundaries of the designated area. Recent alluvium and ancient bench gravel deposits contain some low-grade placer gold; however, no production is anticipated. Some copper prospects exist, but none are estimated to contain more than 500 tons of resources. Two limestone deposits with an estimated resource totaling 5.5 billion tons occur in the study corridor. One of these, the Lime Hill deposit, is owned by Ideal Basic Industries. The company has stated, "Limestone deposits in this area are extremely limited and Ideal considered this property a valuable asset." Therefore, the last sentence of the second paragraph under <u>Minerals</u>, page 45, should be deleted, or should read, "The limestone deposits are of sizes and grades that could support commercial operations."

The last sentence on page 57, "Development, therefore, would conflict directly and irreconcilably with designation and could not be permitted

to occur," should also cite the authority to stop or prohibit mining of the limestone. The statement is in direct conflict with the sentence in the fourth paragraph on page 57 reading, "Mining operations on privately owned land would be unaffected, except as required to meet air and water pollution standards, or as specified in scenic easements."

Jet C. arnen

Herman W. Sheffer

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Comments of Bureau of Mines dated July 24, 1979

1. The report has been revised as suggested.



United States Department of the Interior

BUREAU OF RECLAMATION WASHINGTON, D.C. 20240

IN REPLY REFER TO: 725 121.

AUG 1 3 1979

Memorandum

To:

Director, National Park Service Assistant

From:

Commissioner of Reclamation 🥔

1

Subject: Review of Snake Wild and Scenic River Study Draft Report and Draft Environmental Statement

By copy of the Department of the Interior's June 15, 1979, letter to the Honorable Douglas M. Costle, Administrator, Environmental Protection Agency, we became aware of the subject study and draft environmental statement, and are providing comments.

In view of the major focus now being given to the energy situation, we would suggest that the impacts section on page 58 relating to water resource development be expanded to include the impacts of precluding any water resource development in the river reach. For example, Table 8 shows that 330,000 kWh of hydroelectric power potential with benefits to the nation exceeding \$55 million annually would be foregone in all but one of the alternatives. Because of the importance of this issue, we believe it would be helpful to the reader to point this out in the impacts chapter as well as in Table 8 where the information is now contained. We also believe the values used for energy evaluation should be checked. It appears that a plant factor of about 45 percent was used. In the Pacific Northwest this level of plant factor is considered to be in the range considered for peaking facilities. However, the value of energy used is about 2.5 cents per kilowatt hour or about what would be expected from a base load plant. One of those values needs to be adjusted which will significantly increase the energy benefits.

After accommodation of the above comment we would have no objection to the report. If we can be of further assistance, please let us know.

Comments of Bureau of Reclamation dated August 13, 1979

1. The report has been revised as suggested.

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Dear Mr. Dickenson:

Enclosed is a copy of the Bill for the State Scenic River System, for the 33 miles from Asotin to the Washington-Oregon Border. This was withdrawn from the Committee because the Asotin County Commissioners felt they had two years to make a decision. Obviously from reading the Environmental Impact Statement we only have until August 11, 1979.

Locally we would prefer to see this Bill passed for control of the 33 miles of River. We feel we have enough federal intervention at the present time. It should be pointed out that recreation is our greatest asset in the Lewiston-Clarkston Valley.

If any federal control were necessary, it should be the upper 10 miles. Page 14 shows the settlement of Rogersburg above the mouth of the Grande Ronde River. There are now 10 permanent structures there. This is the end of electricity and telephone service. One mile above the mouth of the Grand Ronde River at Lime Point is where the natural corridor of the Snake River and Hells Canyon begins. Leave the lower 23 miles to be controlled by the State of Washington, let us have the opportunity to decide what is best for our area, instead of having more federal regulations which would ruin one of our greatest assets.

Sincerely yours

1

Howard L. Clovis Mayor

HOUSE BILL NO. 1205

State of Washington 46th Legislature Regular Session

by Representatives Amen, Patterson and Charaley

Read first time February 9, 1979, and referred to Committee on Natural Resources.

1 AN ACT Relating to the scenic river system; emending section 8. 2 chapter 161. Laws of 1977 ex. sees. and RCV 79.72.080: 1 adding a new section to chapter 78.72 RCV; and creating a 4 new section.

6 BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF VASHINGTON:

6 NEV SECTION. Section 1. The legislature finds that the 7 segment of the Snake river from the Oregon-Vashington border downstream to the town of Asotin possesses outstanding natural, 1 # scenic, cultural, and recreational resources and is worthy of 10 addition to the state scenic rivers system. The legislature 11 further finds that the same river segment is being studied by 12 federal interests for addition to the federal wild, scenic and recreation rivers system, and if so designated, would be subject 8 14 to federal takeover of land use controls and property rights.

15 It is the purpose of this act to add this segment of the 16 Snake river to the state scenic rivers system in a manner that 17 will retain state control, protect individual property rights. 18 and forestall federal classification.

19 Sec. 2. Section 8, chapter 161, Laws of 1977 ex. sess. and RCV 78.72.980 are each amended to read as follows: 20

21 The following rivers of the state of Washington are 22 hereby designated as being in the scenic river system of the 23 state of Vashington:

24 (1) The Skykomish river from the junction of the north 26 and south forks of the Skykomish river:

26 (a) Downstream approximately fourteen miles to its 27 Junction with the Sultan river;

28 (b) Upstress approximately twenty miles on the south 28 fork to the junction of the Tye and Fose rivers;

10 (c) Upstream approximately eleven miles on the north .1. HB 2205 1 fork to its junction with Bear creek;

23

(2) The Beckler river from its junction with the south 3 fork of the Skykomish river upstream approximately eight miles to its junction with Rapid river; ((and)) 4

(3) The Tye river from its junction with the south fork 6 of the Skykomish river upstress approximately fourteen miles to

7 Tye Lake; and (4) The Snake river from the Oregon-Vashington border 18 downstress to the town of Asotin.

NEW SECTION. Sec. 8. There is added to chapter 79.72 10 11 RCV a new section to read as follows:

(1) Subject to approval by the committee of t 2 13 participating agencies, the department shall adopt rules, under 14 chapter 34.04 RCW, governing the management of lands within the 15 river area of the Snake scenic river. The rules shall set forth 16 management principles, standards, and plans which protect or 17 enhance the esthetic and scenic values of the Snake river and 18 permit compatible public recreation, agriculture, and other land 19

(a) No roads, railroads, or utilities may be constructed 20 within the river area except where necessary under this 21 subsection unless the department's approval of the use is 22 obtained under subsection (3) of this section;

(b) The surface of related, adjacent land shall not be 24 disturbed for prospecting or mining unless the department's 25 approval is obtained under subsection (3) of this section; and 26

(c) No commercial, business, or industrial structures or 27 buildings other than structures or buildings erected in 28 connection with an existing use may be erected or placed within 28 the river area unless the department's approval of the proposed 38 use is obtained under subsection (3) of this section.

31 The rules may provide restrictions in addition to the 32 restrictions under (a), (b), and (c) of this subsection.

33 (2) No person may use lands within the river area if the 34 35 use violates this section or the rules of the department adopted 36 under this section; no person may use the land in a way in which -2-HB 1205

1 the land was not used before the effective date of this act; no 2 person may engage in the cutting of trees, in mining, or in 3 prospecting on these lands; and no person may construct roads, 4 railroads, utilities, buildings, or other structures on these 5 lands unless the owner of the land has given to the department 6 written notice of the proposal at least one year before 7 commencement and has submitted to the department with the notice 8 a specific and detailed description of the proposal or has 9 entered into an agreement for the proposal with the department 10 under subsection (3) of this section. The owner may, however, 11 act in emergencies without the notice required by this section 12 when necessary in the interests of public safety.

13 (3) Upon receipt of the written notice under subsection 14 (2) of this section, the department shall first determine 15 whether in its judgment the proposal would impair substantially the natural beauty of the Snake scenic river. If the department 16 17 determines that the proposal would not impair substantially the 18 natural beauty of the scenic river, the department shall notify ¥٤ سر in writing the owner of the land involved that he may $\overset{\mathbf{N}}{\odot}$ 20 immediately proceed with the proposal as described to the 21 department. If the department determines that the proposal 22 would impair substantially the natural beauty of the Snake scenic river, the department shall notify in writing the owner 23 24 of the related, adjacent land of this determination, and no 25 steps may be taken to implement the proposal until at least one 26 year after the original notice to the department. During this 27 one-year period:

28 (a) The department and the owner of the land involved 29 may negotiate modifications or alterations of the proposal so 30 that implementation would not in the judgment of the department 31 impair substantially the natural beauty of the Snake scenic 32 river; or

33 (b) The department may acquire by purchase, gift, or
 34 exchange, the land involved or interests therein, including
 35 aconic easements, for the purpose of preserving the natural
 36 beauty of the Snake scenic river.

1 (4) One year after providing written notice under 2 subsection (2) of this section, the owner may use his land in 3 conformity with the specific, written plan, which was submitted 4 under subsection (3) of this section, without the approval 5 required under subsection (3) of this section.

6 (5) With the concurrence of the committee of
7 participating agencies, the department may institute
8 condemnation proceedings and by condemnation acquire lands
9 within the river area:

16 (a) At any time within one year after the receipt of
11 notice of a proposal for the use of the land if the department,
12 with the concurrence of the committee of participating agencies,
13 determines the proposal would impair substantially the natural
14 beauty of the Snake scenic river and the department and the
15 owner are unable to reach an agreement under subsection (3) of
16 this section;

17 (b) At any time land within the river area is used in a 18 manner violating this section, the rules of the department, or 19 any agreement with the department under subsection (3) of this 20 section; or

(c) At any time land within the river area is used in a manner which, in the judgment of the department, impairs asubstantially the natural beauty of the Snake scenic river if the department has not been given at least one year's advance written notice of the use and if the department has not given its approval of the use under subsection (3) of this section.

27 (6) In any condemnation everd, the owner of the land shall not receive any award for the value of any atructure. 28 29 atility, road, or other improvement constructed or erected upon 3.0 the land after the effective date of this act unless the 31 department has received written notice of the propaged structure, utility, road, or other improvement at least one year 32 33 before commencement of construction or erection of the structure, utility, road, or other improvement or unless the 34 25 department has given approval for the improvement under 36 subsection (3) of this section.

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(7) When the department acquires any land that is
 2 located between a river and other land that is owned by a person
 3 having the right to the beneficial use of waters in the river:

4 (a) The right to the beneficial use of the waters shall
 5 not be affected by the condemnation; and

(b) The owner of the other land shall retain a right of
7 access to the river necessary to use, store, or divert such
8 waters as he has a right to use.

(8) The department shall cooperate with the state of 14 Idaho in administering the Snake scenic river. The department 11 is hereby authorized and encouraged to enter into joint 12 development and operation agreements with the state of Idaho of 13 public use facilities within the Snake scenic river.

14 (9) As used in this section, "Snake scenic river" means
 15 that portion of the Snake river designated in RCW 79.72.080.

-6-
STATEMENT BY DEPARTMENT OF ECOLOGY

In Relation to Snake Scenic River Bill No. H.B.

t. a. Provision location (page/line): 2/8-9

b. Effect of Provision:

Designates a segment of the Snake River as a component of the State Scenic Rivers System. <u>Would provide that the Snake River</u> from the town of Asotin upstream to the Oregon/Washington border be administered by the Washington State Parks Commission as a State Scenic River.

- c. Reason for Enactment;
 - 'This action is necessary to forestall a pending federal (Department of the Interior) recommendation that the same river segment be added to the National Wild and Scenic Rivers system. If placed in the national system, local and state control over land use and public use of the river would be overridden. Any future options the state may wish to consider for this reach in response to changing regional needs would be eliminated.

This legislation is consistent with Interior's tentative recommendation that the States of Washington and Idaho be given the opportunity to place the subject river segment under state control in lieu of federal designation.

Basic provisions of the existing State Scenic Rivers Act will apply, but there are added provisions applicable to the Snake These added provisions are necessary to assure that the federal government will find state protection adequate.

STATEMENT BY DEPARTMENT OF ECOLOGY

In Relation to Snake Scenic River Bill No. 4.B.____.

1. a. Provision Location (page/line): 2/12-33

b. Effect of Provision:

Provides that rules and regulations pertaining to lands along the Snake River would be adopted only with approval of the committee of participating agencies. Also specifies certain uses that are not permitted.

c. Reason for Enactment:

By legislative definition the committee of participating agencies would include seven state agencies, the associations of cities and of counties, and a representative of Asotin County for the Snake Scenic River. In conjunction with required public hearings, this will assure that local people will have a strong voice in rule making.

This section also limits uses and sets policy for permitted uses along the river. This serves to guide the committee of participating agencies and is necessary to give the legislature opportunity to specify policy and limit state agency discretion.

STATEMENT BY DEPARTMENT OF ECOLOGY In Relation to Snake Scenic River Bill No. #.B.

1. a. Provision Location (page/line): 2/34 - 4/5

b. Effect of Provision:

Provides a process where a landowner can develop his property after giving notice to the state subject to certain provisions.

c. Reason for Enactment:

This provision is tailored after Oregon's successful scenic waterways system. It provides that a private landowner can develop his property with the following limitations:

- He must provide the state with one year's written notice of his intended development.
- (2) The state can issue him a permit to go ahead as planned or negotiate modifications within the year.
- (3) If, after a year the state has not acted, the owner can go ahead sans permit.
- (4) If the state decides it does not want the development to proceed, it has a year to acquire the property. Eminent domain is permitted, but only if all other possibilities fail.

Of the many different kinds of scenic river systems enacted by the different states, this one appears to be the least painful to private landowners. The Oregon system has been singled out nationally as a very successful means of protecting scenic resources along selected rivers with minimal purchase of private land. The Oregon system has been judged in past instances by the Department of the Interior as "adequate" for scenic river protection. Therefore, we feel the same judgment would come to pass on the Snake.

Line 24, page 3, if not corrected, should be changed to read: "... of the related;-adjacent-land land involved of this determination, and no...."

House Committee Amendment to House Bill No. By

On page 2, beginning on line 32, strike all material on lines 32 and 33, and insert "(d) No provisions of this act shall change any existing use of the land involved as of the effective date of this act."

On page 3, line 24, after "the" and before "of" strike "related, adjacent land" and insert "land involved"

BRAFT/J SCOTT:vhp January 26, 1979

STATEMENT BY DEPARTMENT OF ECOLOGY

In Relation to Snake Scenic River Bill No. H.B._____.

1. a. Provision Location (page/line): 4/6 - 4/36

b. Effect of Provision:

Limits the use of eminent domain and requires approval of the committee of participating agencies in all condemnations.

c. Reason for Enactment:

By limiting eminent domain to unusual situations only with the approval of the committee of participating agencies, private landowner rights are better protected than if the administering agency is given a free hand.

This provision means that it will be unlikely that condemnation would ever occur, and if it does, would insure that it is a last-resort act when there is a clear danger the river's scenic values would be destroyed.

STATEMENT BY DEPARTMENT OF ECOLOGY

In Relation to Snake Scenic River Bill No. 4.8.

1. a. Provision Location (page/line): 5/9 - 13

b. <u>Effect of Provision</u>: Provides for coordination with the State of Idaho.

c. Reason for Enactment:

State protection will not be viewed as adequate by the federal Department of the Interior unless the two states provide similar levels of protection and coordinate river management.

returned as a recovered expense to the forest development account and may be used to acquire property under RCW 79.66.020. [1977 1st ex.s. c 109 § 5.]

Chapter 79.72 SCENIC RIVER SYSTEM

Sections	
79.72.010	Legislative finding-Purpose.
79.72.020	DefinitionsCommittee of participating agencies.
79.72.030	Management policies—Development—Inclusion of management plans—Identification and exclu- sion of unsuitably developed lands—Boundaries of river areas—Hearings—Notice—Mect- ings—Chairman—Studies—Proposals for twittem additions
79.72.040	Administration of management Program——Powers, duties and authority of department.
79,72.050	State agencies and local governments to pursue poli- cies to conserve and enhance included river areas——Shoreline management act——Private lands——Trust lands.
79.72.060	Criteria for inclusion of rivers within system.
79.72.070	Authority of departments of Fisheries and game unaffected.
79.72.0SO	Rivers designated as part of system.
79.72.090	Inclusion of state's scenic rivers in national wild and scenic river system not precluded,
79.72.100	Game fund moneys not to be used.
79.72.110	Funding.
79.72.900	Severability

79.72.010 Legislative finding---Purpose. The legislature hereby finds that many rivers of this state, with their immediate environs, possess outstanding natural, scenic, historic, ecological, and recreational values of present and future benefit to the public. The legislature further finds that the policy of permitting the construction of dams and other impoundment facilities at appropriate sections of the rivers of this state needs to be complemented by a policy that would protect and preserve the natural character of such rivers and fulfill other conservation purposes. It is hereby declared to be the policy of this state that certain selected rivers of the state which, with their immediate environs, possess the aforementioned characteristics, shall be preserved in as natural a condition as practical and that overuse of such rivers, which tends to downgrade their natural condition, shall be discouraged.

The purpose of this chapter is to establish a program for managing publicly owned land on rivers included in the state's scenic river system, to indicate the river segments to be initially included in that system, to prescribe a procedure for adding additional components to the system, and to protect the rights of private property owners, [1977 1st ex.s. c 161 § 1.]

79.72.020 Definitions——Committee of participating agencies. The following terms when used in this chapter shall be defined as follows unless the context clearly requires otherwise:

(1) "Department" means state parks and recreation commission.

(2) "Committee of participating agencies" or "committee" means a committee composed of the executive head, or such executive's designee, of each of the state departments of ecology, fisheries, game, natura resources, and highways, the state parks and recreation commission, the interagency committee for outdoor recreation, the Washington state association of counties and the association of Washington cities.

When a specific river or river segment of the state's scenic river system is being considered by the committee, a representative of each participating local government associated with that river or river segment shall serve as a member of the committee.

(3) "Participating local government" means the legislative authority of any city or county, a portion of where territorial jurisdiction is bounded by or includes a river or river segment of the state's seenic river system.

(4) "River" means a flowing body of water or a section, segment, or portion thereof.

(5) "River area" means a river and the land area in its immediate environs as established by the participating agencies not exceeding a width of one-quarter mile landward from the streamway on either side of the river.

(6) "Scenic casement" means the negotiated right to control the use of land, including the air space above such land, for the purpose of protecting the scenic view throughout the visual corridor.

(7) "Streamway" means that stream-dependent corrider of single or multiple, wet or dry, channel or channels within which the usual seasonal or stormwater run-off peaks are contained, and within which environment the flora, fauna, soil, and topography is dependent on or influenced by the height and velocity of the fluctuating river currents.

(8) "System" means all the rivers and river areas in the state designated by the legislature for inclusion as scenic rivers but does not include tributaries of a designated river unless specifically included by the legislature. The inclusion of a river in the system does not mean that other rivers or tributaries in a drainage basin shall be required to be part of the management program developed for the system unless such rivers and tributaries within the drainage basin are specifically designated for inclusion by the legislature.

(9) "Visual corridor" means that area which can be seen in a normal summer month by a person of normal vision walking either bank of a river included in the system. Such corridor shall not exceed the river area, [1977 1st ex.s. $c 161 \S 2$.]

Reviser's note: "department of highways" redesignated as "department of transportation" by 1977 1st ex.s. c 151. See RCW 47.04.015.

79.72.030 Management policies—Development—Inclusion of management plans—Identification and exclasion of unsuitably developed lands— Boundaries of river areas—Hearings—Notice— Meetings—Chairman—Studies—Proposals for system additions, (1) The department shall develop and adopt management policies for publicly owned or leased hand on the rivers designated by the legislature as being a part of the state's scenic river system and within the associated river areas. The department may adopt regulations identifying river classifications which reflect the characteristics common to various segments of scene rivers and may adopt management policies consistent with local government's shoreline management master plans appropriate for each such river classification. All such policies shall be subject to review by the committee of participating agencies. Once such a policy has been approved by a majority vote of the committee members, it shall be adopted by the department in accordance with the provisions of chapter 34.04 RCW, as now or hereafter amended. Any variance with such a policy by any public agency shall be authorized only by the approval of the committee of participating agencies by majority vote, and shall be made only to alleviate unusual hardships unique to a given segment of the system.

(2) Any policies developed pursuant to subsection (1) of this section shall include management plans for protecting ecological, economic, recreational, aesthetic, botanical, scenic, geological, hydrological, fish and wildlife, historical, cultural, archaeological, and scientific features of the rivers designated as being in the system. Such policies shall also include management plans to encourage any nonprofit group, organization, association, person, or corporation to develop and adopt programs for the purpose of increasing fish propagation.

(3) The committee of participating agencies shall, by two-thirds majority vote, identify on a river by river basis any publicly owned or leased lands which could be included in a river area of the system but which are developed in a manner unsuitable for land to be managed as part of the system. The department shall exclude lands so identified from the provisions of any management policies implementing the provisions of this chapter.

(4) The committee of participating agencies, by inajority vote, shall determine the boundaries which shall define the river area associated with any included river. With respect to the rivers named in RCW 79.72.080, the committee shall make such determination, and those determinations authorized by subsection (3) of this section, within one year of September 21, 1977.

(5) Before making a decision regarding the river area to be included in the system, a variance in policy, or the excluding of land from the provisions of the management policies, the committee shall hold hearings in accord with chapter 34.04 RCW, with at least one public hearing to be held in the general locale of the river under consideration. The department shall cause to be published in a newspaper of general circulation in the area which includes the river or rivers to be considered, a description, including a map showing such river or rivers, of the material to be considered at the public hearing. Such notice shall appear at least twice in the time period between two and four weeks prior to the public hearing.

(6) Meetings of the committee shall be called by the department or by written petition signed by five or more of the committee members. The chairman of the parks and recreation commission or the chairman's designee shall serve as the chairman of any meetings of the committee held to implement the provisions of this chapter.

The committee shall seek and receive comments from the public regarding potential additions to the system, shall initiate studies, and may, through the department, submit to any session of the legislature proposals' for additions to the state scenic river system. These proposals shall be accompanied by a detailed report on the factors which, in the committee's judgment, make an area a worthy addition to the system. [1977 1st ex.s. c 161 § 3.]

79.72.040 Administration of management Program-Powers, duties and authority of department, (1) The management program for the system shall be administered by the department. The department shall have the responsibility for coordinating the development of the program between affected state agencies and participating local governments, and shall develop and adopt rules and regulations, in accord with chapter 34.04 RCW, for each portion of the system, which shall implement the management policies. In developing rules and regulations for a specific river in the system, the department shall hold at least one public hearing in the general locale of the river under consideration. The department shall cause a brief summary of the proposed rules and regulations to be published twice in a newspaper of general circulation in the area which includes the river to be considered in the period of time between two and four weeks prior to the public hearing. In addition to the foregoing required publication, the department shall also provide notice of the hearings, rules, regulations, and decisions of the department to radio and television stations and major local newspapers in the areas which include the river to be considered.

(2) In addition to any other powers granted to carry out the intent of this chapter, the department is authorized, subject to approval by majority vote of the members of the committee, to: (a) Purchase, within the river area, real property in fee or any lesser right or interest in real property including, but not limited to scenic easements and future development rights, visual corridors, wildlife habitats, unique ecological areas, historical sites, camping and picnic areas, boat launching sites, and/or easements abutting the river for the purpose of presening or enhancing the river or facilitating the use of the river by the public for fishing, boating and other water related activities; and (b) purchase, outside of a river area, public access to the river area.

The right of eminent domain shall not be utilized in any purchase made pursuant to this section.

(3) The department is further authorized to: (2) Acquire by gift, devise, grant, or dedication the fee. 3⁻ option to purchase, a right of first refusal or any effer lesser right or interest in real property and upon acquisition such real property shall be held and managed within the scenic river system; and (b) accept grants contributions, or funds from any agency, public or private, or individual for the purposes of this chapter.

[1977 RCW Supp-page 760]

79.72.050 State agencies and local governments to pursue policies to conserve and enhance included river areas----Shoreline act-Private management lands-Trust lands. (1) All state government agencies and local governments are hereby directed to pursue policies with regard to their respective activities, functions, powers, and duties which are designed to conserve and enhance the conditions of rivers which have been included in the system, in accordance with the management policies and the rules and regulations adopted by the department for such rivers. Local agencies are directed to pursue such policies with respect to all lands in the river area owned or leased by such local agencies. Nothing in this chapter shall authorize the modification of a shoreline management plan adopted by a local government and approved by the state pursuant to chapter 90.58 RCW without the approval of the department of ecology and local government. The policies adopted pursuant to this chapter shall be integrated, as fully as possible, with those of the shoreline management act of 1971.

(2) Nothing in this chapter shall grant to the committee of participating agencies or the department the power to restrict the use of private land without either the specific written consent of the owner thereof or the acquisition of rights in real property authorized by RCW 79.72.040.

(3) Nothing in this chapter shall prohibit the department of natural resources from exercising its full responsibilities and obligations for the management of state trust lands. [1977 1st ex.s. c 161 § 5.]

79.72.060 Criteria for inclusion of rivers within system. Rivers of a scenic nature are eligible for inclusion in the system. Ideally, a scenic river:

(1) Is free-flowing without diversions that hinder recreational use:

(2) Has a streamway that is relatively unmodified by riprapping and other stream bank protection;

(3) Has water of sufficient quality and quantity to be deemed worthy of protection;

(4) Has a relatively natural setting and adequate open space;

(5) Requires some coordinated plan of management in order to enhance and preserve the river area; and

(6) Has some lands along its length already in public ownership, or the possibility for purchase or dedication of public access and/or scenic casements. [1977 1st ex.s. c 161 § 6.]

79.72.070 Authority of departments of fisheries and game unaffected. Nothing contained in this chapter shall affect the authority of the department of fisheries and the department of game to construct facilities or make improvements to facilitate the passage or propagation of fish nor shall anything in this chapter be construed to interfere with the powers, duties, and authority of the department of fisheries or the department of game to regulate, manage, conserve, and provide for the barvest of fish or wildlife within any area designated as being in the state's scenic river system: *Provided*, That no hunting shall be permitted in any state park. [1977 1st ex.s. c 161 § 7.]

79.72.080 Rivers designated as part of system. The following rivers of the state of Washington are hereby designated as being in the scenic river system of the state of Washington:

(1) The Skykomish river from the junction of the north and south forks of the Skykomish river:

(a) Downstream approximately fourteen miles to its junction with the Sultan river;

(b) Upstream approximately twenty miles on the south fork to the junction of the Tye and Foss rivers;

(c) Upstream approximately eleven miles on the north fork to its junction with Bear creek;

(2) The Beckler river from its junction with the south fork of the Skykomish river upstream approximately eight miles to its junction with Rapid river; and

(3) The Tye river from its junction with the south fork of the Skykomish river upstream approximately fourteen miles to Tyc Lake. [1977 1st ex.s. c 161 § 8.]

Green river gorge conservation area: RCW 43.51.900-43.51.930.

79.72.090 Inclusion of state's scenic rivers in national wild and scenic river system not precluded. Nothing in this chapter shall preclude a section or segment of the state's scenic rivers included in the system from becoming a part of the national wild and scenic river system. [1977 1st ex.s. c 161 § 9.]

79.72.100 Game fund moneys not to be used. No funds shall be expended from the game fund to carry out the provisions of this chapter. [1977 1st ex.s. c 161 § 10.]

79.72.110 Funding. All funds for the implementation of this chapter as now or hereafter amended shall come from the general fund. [1977 1st ex.s. c 161 § 11.]

79.72.900 Severability—1977 1st ex.s. c 161. If any provision of this act, or its application to any person of legal entity or circumstances, is held invalid, the remainder of the act, or the application of the provision to other persons or legal entities or circumstances, shall not be affected. [1977 1st ex.s. c 161 § 12.]

SUBJECT INDEX----PUBLIC LAND ACTS OF SPECIAL OR HISTORICAL NATURE NOT CODIFIED IN RCW

	(1961	59
Benton County, state patrol land	1977 ex.s.	191

Comments of City of Clarkston dated July 25, 1979

1. The report has been revised to include additional reasoning why it recommends that Pederal control extend downstream to the Grande Ronde.

ï

WILLIAM E. CHETWOOD, D.M.D. 939 Bryden LEWISTON, IDAHO 83501

September 4, 1979

Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Bldg. Seattle WA 98101

Dear Sir:

I have reviewed the Snake River Wild and Scenic River study and agree that the issues have been properly addressed.

Alternative #1, the one recommended by the study, would be my choice for implementation. I have seen many areas destroyed by population invasions and this is a prime opportunity to preserve a natural area against further degeneration.

Sincerely,

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1 15 SEP <u>.</u> Q? A 220 ACTION TAXLO

WEC/jd

Clearwater Conservation FC	RUM		
306 FIFT	AVENUE		
August 2, 1979	AUS 6	'79	
Russell E. Dickenson, Regional Director	NPS-PNRO D DD	Init.	Date
National Park Service 601 Fourth and Pike Bldg. Seattle, NA. 98101			
Re: DEIS on Snake: Wild and Scenic Study	DPA DEO VHCK		·····
Deen Mr. Diekonson.	Centr	al Files	
Dear Mr. Dickenson:	Action	n Taker	0

The Clearwater Conservation Forum wishes to go on record as support ing the basics of the recommended Alternative 1. Cur concerns.

within this recommendation are explained below.

What will inhibit the rapid pace of development that is going on along the Asotin Co. side while a decision is made on whether the states can protect the land? We suggest some sort of interim management that would assure a more torium on residential and recreational development.

On page 10 it is noted that the lateral boundary on the Asotin Co. 2 side only extends to the county road. We recommend the boundary be extended to the visual foreground as it is on the Nez Perce Co. side. The recommended protection is simply not adequate to protect the visual resource.

On page 85 the chart shows an increase of jet boating to 6,538 days. We feel this type of increase wil impair the other values for which 3 the Snake is being protected. Jet boat access should not be increased along this stretch of river. The Lower Granite pool offers plenty of water for jet boating. No doubt jet boat use will increase without improved access. Increasing jet boat opportunites could be considered as counter to the National Energy Policy.

If you haven't already noticed the mistake on page 28, please note that the Middle Fork Salmon is not 10 miles southeast of the study segment.

Thank you for this opportunity to comment. Please send a copy of the Final EIS to the address above.

ົດນກອ Lee Milner, Coordinator

Comments of Clearwater Conservation Forum. dated August 2, 1979

- Even "interim action" requires some kind of county zoning or State or Federal legislative initiative.
- 2. The report has been revised to more clearly enunciate where the lateral boundary should be located in Asotin County.
- 3. One of the most important and urgent tasks facing the future managers of the study segment will be to determine the proper amounts and kinds of recreation uses which are consistent with protecting the river environment and to devise workable ways of carrying them out.
- 4. The report has been revised as suggested.



DEPARTMENT OF TRANSPORTATION UNITED STATES COAST GUARD

MAILING ADDRESS: COMMANDER (dpl) THIRTEENTH COAST GUARD DISTRICT 915 SECOND AVE SEATTLE, WASH. 98174 PHONE 206 442-7523

16452 DPL79-747

1 3 JUL 1979

Mr. Russell E. Dickenson **Regional Director** Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, WA 98101

Dear Mr. Dickenson:

We have reviewed your Draft Report/Environmental Statement on the Snake Wild and Scenic River Study. We have no comment on the report.

Thank you for the opportunity to review this document.

Sincerely,

Ruhan man

RICHARD F. MALM Captain, U.S. Coast Guard Chief of Staff 13th Coast Guard District

Copy: COMDT (G-WEP)

The Corporation of the Great Southwest

Post Office Box 53330 Houston, Texas 77052 Phone 223-4061

July 16, 1979

Mr. Russell E. Dickenson Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Bldg. Seattle, Washington 98101

Dear Mr. Dickenson:

This will acknowledge receipt of the Draft Report/Environmental Statement with regard to the Snake Wild and Scenic River Study which we have read with interest.

As a matter of record, we wish to state that, as private owners of land along the river, we would have no interest in granting scenic easements or selling land for the prices outlined in your study.

Very truly yours

Vane Riggs Vice President



DEPARTMENT OF THE ARMY WALLA WALLA DISTRICT, CORPS OF ENGINEERS

BLDG. 602, CITY-COUNTY AIRPORT WALLA WALLA, WASHINGTON 99362

NPWEN-PL

3 August 1979

Mr. Russell E. Dickenson Regional Director Pacific Northwest Region National Park Service 601 Fourth & Pike Building Seattle, Washington 98101

Dear Mr. Dickenson:

We have completed our review of the Snake Wild and Scenic River Study Draft Report/Environmental Statement and have inclosed some specific comments for your consideration. As we indicated in our previous letter of 11 July 1979 to you, there will also be a Corps of Engineers coordinated response which will be furnished by the Assistant Secretary of Army for Civil Works.

We appreciate this opportunity to review and comment on the statement.

Sincerely,

In E berly

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W. E. SIVLER Chief, Engineering Division

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WALLA WALLA DISTRICT CORPS OF ENGINEERS COMMENTS TO THE DRAFT REPORT/ENVIRONMENTAL STATEMENT SNAKE WILD AND SCENIC RIVER

1. Page 3, second paragraph. It appears that, in this study, the Principles and Standards are valuable for display of alternatives (Table 8) and guidance on public involvement but are not used as a basis for "... selecting the plan which makes best use of the resources ..." As indicated in paragraph 1, page 5, the basic task was to determine whether or not the study segment met Wild and Scenic River criteria; a "yes" or "no" determination.

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2. Page 16, first paragraph. The description of the Asotin Dam from the beginning of the paragraph through the sentence ending with "River Mile 175.5" is for the project in House Document (HD) 403. The remainder of the paragraph and Table 8 are for a higher potential project at the same site that would back water up to the boundary of the Hells Canyon National Recreation area in order to evaluate the full hydropower benefit foregone by classification. This project could produce an estimated 330 MW of average annual energy with an installed capacity of 844 MW. Reference: See inclosure 3 to our letter dated 5 December 1977 to Mr. John Hough.

3. The construction cost for the potential project is estimated at \$470,000,000, rather than \$410,000,000 as quoted in the report. The \$410,000,000 quoted in our 2 May 1977 letter to Mr. Maurice H. Lundy of the Bureau of Outdoor Recreation, was mislabeled. It did not include costs for Engineering and Design and Supervision and Administration.

4. Page 18, last paragraph. The report should include paragraphs under Corps of Engineers heading and worded generally thus:

The Corps of Engineers was authorized by the River and Harbor Acts of 1902 and 1935 to maintain a navigation channel from Lewiston to Johnson Bar (91 miles). Under this program the Corps has expended \$170,000 in the construction of deflection groins, rock removal from the navigation channel, and maintenance of the centerline channel markers.

The river reach of the study area is included in the category of a navigable water of the United States; it is administratively put in that category by the Corps because of the historic, present, and future use in commercial navigation.

The Walla Walla District Engineer administers the permit authority for any river-oriented work under Section 10 of the River and Harbor Act of 1899, and for the disposal of dredged material or fill in the waterway under Section 404 of the 1977 Clean Water Act. 5. Page 34, third paragraph. No public marinas are currently under construction in Lewiston, Clarkston, and Asotin. Existing slips will accommodate 165 boats. Planned ultimate development will accommodate 800 boats. Currently, there is discussion on construction of additional berths below the confluence of the Snake and Clearwater Rivers to accommodate 21 sailboats.

6. Page 43, second paragraph. Conflict exists between this paragraph which lists five rare plants which "may exist within study area" and Table 8, page 84, Alternative 2 which states "Nine plants are listed as endangered species that are within the study area." The five species are proposed endangered and not as yet listed under the Endangered Species Act. Haplopappus radiatus is within the family Asteraceae, not Asclepiadaceae.

7. Page 49, Table 7. The percentages of change between 1969 and 1974 for total recreation days and total angler days are statistically meaningless because 1969 float boater use is shown as "unavailable."

8. Page 53, third paragraph. See Comment 5.

9. Page 57, fifth paragraph, last sentence. Statement that limestone development "could not be permitted to occur" contradicts information provided in brochures and public meetings during the public involvement process. The statement also is inconsistent with the statement in third paragraph, page 65, that "mining of the limestone deposits and other minerals may not be possible."

10. Page 60, Impacts on Transportation. There is no discussion of impacts on navigation maintenance. Would Wild and Scenic designation supersede laws authorizing channel maintenance? The need for this subject to be resolved was pointed out by the Corps several times during the study process.

11. Page 63. A statement should be added to explain requirements for navigation maintenance relative to any wild and scenic restrictions on this activity.

12. Page 65, third paragraph. See comments 8 and 9 above.

13. Page 72, first paragraph. This is a misleading presentation of costs and benefits. Annual costs (not total cost) and annual benefits should be shown to derive net annual benefits.

14. Table 8, page 83. The following statements under Alternative 2 are true for all alternatives: 1. Maintenance of Free Flowing River, last sentence, "Upstream irrigation development could substantially reduce flows," and 3.B. Aesthetics, last sentence, "Possible reduction of flows could also have a negative impact."

15. Table 8, page 84, Alternative 1, 4. Fish and Wildlife. The statement "Anadromous fish runs would be managed to maintain and possibly enhance existing populations" is true for all alternatives.

16. Table 8, page 84, 4. Fish and Wildlife, Alternative 3. Anadromous fish values should not be lost if costs of mitigation, as shown on page 87, are expended.

17. Table 8, page 84, Alternative 3, 4. Fish and Wildlife, third paragraph. A Data are not conclusive that "white sturgeon would be eliminated."

18. Table 8, page 84, Alternative 3,4. Fish and Wildlife, fourth paragraph. Asotin Dam would be a "run-of-the-river" project and the reservoir would not be drained.

19. Table 8, page 84, Alternative 3, 5. Ecological Systems, first and second paragraphs. First sentence of first paragraph should be switched with second paragraph. Also, see Comment. 15.

20. Table 8, page 84, Alternative 2, 5. Ecological Systems, third paragraph. See Comment 6.

21. Table 8, page 85, Alternative 1, Benefits, 1. Irrigation. A "clause protecting upstream diversions of water" is not a benefit. This is an existing situation which is protected by Public Law 94-199 which established the Hells Canyon National Recreation Area, and would apply to all alternatives.

22. Table 8, page 85, 6. Recreation. Benefits for Alternative 1 appear to be unsubstantiated and in contradiction with the text. As stated, the benefits are based on a recreation increase of "10% per year for 10 years until recreation carrying capacity, yet to be determined, is reached." However, inconsistent rationale is used in determining development costs on page 11, fifth paragraph: "The following cost figures are tentative and are designed to provide for current recreation use levels based on the assumption that current levels are at or near the area's carrying capacity." Thus, minimal development costs are presented (pages 16 and 88) for current recreation levels but maximal benefits for future carrying capacity are claimed in Table 8. Similarly, minimal impacts as a result of limitations on amount of recreation are stated (p. 55, first paragraph, second sentence; and p. 58, third and fourth paragraphs) while benefits claimed are 260 percent of those for Alternative 2 which places no recreation limitations.

Benefits for Alternative 2 are not consistent with statements in the text and appear to be understated. The recreation use study of the Asotin Dam impact area by the Washington Department of Game estimated 64,751 person days of recreation in 1971. The text states "These data are obviously outdated and a more current study would reflect increased use by all components"

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(second paragraph, page 49) and "Unmanaged increases in public recreation use of the river and adjoining lands would continue at a rate of 5 percent annually" (sixth paragraph, page 70). So, why are benefits of Alternative 2 based on only 64,413 person days of use?

Under Alternatives 8 and 9, why would recreation benefits for unmanaged lower 22 and 29 miles, respectively, be similar to Alternative 1? These benefits should be similar to Alternative 2.

23. Table 8, page 86, 7. Fish and Wildlife. The compensation plan effects apply to all alternatives and are not contingent on wild and scenic designation.

24. Table 8, page 87, 10.B. Commercial Development, Alternative 3. The statement "Resorts and other recreation facilities would be developed around periphery of reservoir" does not appear to be consistent with limited recreation benefits stated on page 85.

25. Table 8, page 87, Costs, 7. Fish and Wildlife, Alternative 3. The cost for fish and wildlife annual O&M is 25 percent of the construction cost which seems much too high, based on past experience. Does it include O&M costs for items other than related to the Asotin project?

See, also, Comment 16. Claiming anadromous fish losses and also charging mitigation costs is double counting.

26. Table 8, page 89, 2. Health and Sanitation, A. Solid Waste and Water Bacteria. Descriptions of impacts under Alternative 3, as compared to those of Alternative 1, do not appear to be consistent with use reflected by recreation benefits which are seven times as great in Alternative 1.

27. Table 8, page 89, 3. Family and Individual Changes, Alternative 3. Second sentence should read, "Could bring more temporary construction ..."



DEPARTMENT OF THE ARMY WALLA WALLA DISTRICT, CORPS OF ENGINEERS

R DG. 602, CITY-COUNTY AIRPORT WALLA WALLA, WASHINGTON 99362

NPWEN-PL

Offic: December 1977

RECENTARY

Mr. John Hough Department of the Interior 915 2nd Avenue, Room 3292 Seattle, Washington 98174

Dear Mr. Hough:

Colonel Allaire asked me to furnish you information on the Asotin Project. Studies for this project were made for the review report of the Columbia River and Tributaries published as House Document No. 403 in 1962. The part of the report relating to the Asotin Project is attached as Inclosure 1. This analysis shows a justification ratio of 1.97 to 1. Installation of a navigation lock was only marginally justified. Therefore, the Chief of Engineers in his endorsement of this report recommended that navigation facilities not be constructed in the original project, but provision be made for future installation of a lock. With this change, the justification ratio increased to 2.31 to 1. The paragraph in House Document 403 making this recommendation is attached as Inclosure 2.

The project was authorized as a run-of-the-river power project with provisions for adding a navigation lock in the future by Public Law 87-874, October 1962. Since authorization, no detailed studies have been made on this project. We have, however, updated costs and benefits by using cost indexes and other information readily available. These analyses have all shown Asotin Project to have a good benefit-to-cost ratio. 00r latest updating is shown on the attached information sheet, Inclosure 3. This indicates that the benefit-to-cost ratio of the original project would be 1.7 to 1, based on July 1976 price level. The potential project described on this sheet is a project that would develop the head from the Asotin site to the boundary of the present Hells Canyon National Recreation Area. This project would have a benefit-to-cost ratio of 1.4 to 1. Since no detailed studies have been made of either the original project or this potential project, the figures should be considered as very preliminary. In order to get reasonably accurate figures, a review

NPWEN-PL. Mr. John Hough

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of the design layout, a rescoping of the power installation, and a new estimate would need to be made. However, I do believe that the project would show a good economic benefit-to-cost ratio.

If you have further questions please call me. My FTS number is 442-5308.

Sincerely yours,

Frank Harmon

FRANK W. PARSONS Chief, Planning Branch

3 Incl As stated

SNAKE RIVER

The Austin project is an element of the Major Water Plan.

GENERAL DESCRIPTION

The Asotin project site is located at mile 146.8 on Snake River at the upstream limits of the town of Asotin. The reservoir would provide pendage for power generation and at nermal pool elevation 842.5 would extend upstream 26 miles on the Snake Elver and about 2 miles up the Grande Konde River. The initial installed capacity would be 288,000 kw. A dam at this location was studied in very preliminary scope during investigation leading to the preparation of House Document 531, 81st Congress.

The dam site is at the upstream limit of Lower Granite Reservoir at elevation 735 and the proposed pool would extend upstream to the China Gardens dam site. While it would be desirable to have more overlap between Lower Granite pool and Asotin Dam, this could not be accomplished without causing major disruption to the town of Asotin. The location and project layout are shown on Plate 41. Additional project details are shown on Plates 79 to 81, Appendix E.

HYDROLOGY

The drainage area tributary to the Asotin site is 93,100 square miles of varied terrain. The average annual runoff of Snake River at this location for the 46-year period 1910-1955 is 24,500,000 acre-feet. Maximum and minimum annual runoffs were 34,940,000 and 13,670,000 acre-feet, respectively. The maximum probable flood peak estimated for this location is 640,000 cfs, and this discharge has been weed for spillway design.

DAM SITE

At the selected site, Snake River is about 700 feet wide. The river makes a right angle turn to the left and impinges against the right canyon wall which rises steeply and corsists of a series of exposed basalt flows. The left abutment is covered by a layer of gravels and silts to a depth of 20 feet. The site is located in an area where the bedrock consists of a series of extrusive lava flows of basalt intercalated with flow breccias and similar less desirable types of volcanic rock. The lava flows can be separated into two distinct groups, based on their occurrence, method of deposition and areal distribution.



Snake River at Asotin, Washington. The days of Asotin Dam Site is invediately upstream from these about 600 just above the grain elevator.

The older lavas belong to the Columbia River basalt group and form a series of conformable flows, none of which exceed 100 feet in thickness and which are now inclined approximately 370 feet per mile northward. Before the present erosion cycle was developed, these flows were deeply eroded into mountainous topography with canyons approximating in depth those of the present streams. A second period of lava flows filled these canyons and now these intracanyon lavas crop out as irregular masses throughout the area. The bedrock at the site is believed to be the older lavas. but immediately upstream the intracanyon lavas are exposed in the right canyon wall. Drilling has indicated that a thick stratum of flow breccia occurs on the left bank and in the channel under a thin ledge forming the present riverbed. Since some of the foundation of the proposed structure extends in depth into this flow breccia, which is of unsatisfactory quality for foundation material, further investigation of the area will be required to determine the most favorable site. The initial dip of the older lavas and the erratic distribution of the younger intracanyon lavas permit considerable variation in foundation conditions : thin short distances.

PROJECT LAYOUT

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The dam would consist of a gated overflow spillway section, concrete gravity sections connecting the spillway to the navigation lock and the powerhouse, a concrete gravity section between the right abutment and the powerhouse, and a rockfill embaniment between the left abutment and the navigation lock. With tailwater at elevation 735, effective height of the dam and gross head would be 107.5 feet and the maximum height of the dam structure would be 200 feet. The spiliway would be located on the left bank of the river and would be controlled by six 50- by 50-foot tainter gates which would have a capacity of 420,000 cfs at normal pool elevation 842.5 and 640,000 cfs at maximum pool elevation 856.5. A horizontal type stilling basin would extend the full width of the spillway. The crest length of the dam including the embankment section would be 2,900 feet.

The navigation lock would be located to the left and inland from the spillway. The lock chamber would be 86 feet wide and 675 feet long so as to conform with locks at the lower inake River projects. The maximum lock lift would be 110.5 feet and would occur when Lower Granite pool is at elevation 732 and Asotin pool is at normal elevation 842.5. The normal lift would be 107.5 feet. Upper and lower lock sills would be designed to provide a minimum depth of 15 feet as proposed for lower Snake River projects. Upstream and downstream guide walls, equal to the length of the lock chamber, would be provided. Structural design of the navigation lock would be similar to that for recent projects on lower Snake and Columbia Rivers.

The location of the lock in the left abutment requires that an approach channel be excavated from the river to the lock. This channel would be 1,900 feet long and 250 feet wide, providing a minimum depth of 15 feet when Lower Granite pool is at elevation 732.

In order to provide a minimum depth of .5 feet and a minimum width of 250 feet in the river downstream from the project, it would be necessary to remove about 150,000 cubic yards of material from the river bottom. Further excavation in the amount of 1,440,000 cubic yards would be required to reduce downstream velocities to 5 feet per second for river flows up to 60,000 cfs, the hydraulic capace ity of the powerplant, and to 7 feet per second when the river flow is 210,000 cfs, the average annual flood, which will be equaled or exceeded for relatively short periods of time. This material would be removed by dradging with the excavated rock or gravel being transported and spoiled in a deep portion of Lower Granite pool.

The proposed power installation would consist of three 96,000-kw units totaling 288,000 kw initially and space would be provided to permit one additional unit of similar size to be added at a later date for a total installed capacity of 384,000 kw. Kaplan-type turbines are proposed. Provisions for the fourth unit would consist of the intake and draft tube structure. Access to the erection bay would be by road along the Idaho side of the river.

Facilities for passage of upstream migrants would consist of attraction water pumping plants, a collection channel over the powerhouse draft tubes, a special entrance for the Washington shore fish ladder, and two fish ladders for transportation over the dam. No specific facilities would be provided for downstream migrants. Their routes of passage would be through the spillway, powerhouse trash sluice, and turbines.

RESERVOIR DESCRIPTION

At normal pool elevation 842.5, surface area would be 3,900 acres. Grande Ronde River, a major tributary, enters the reservoir approximately four miles downstream from the head of the pool. There are several small ranch units within the reservoir area situated on narrow benches along the river's edge. The principal crop raised is alfalfa hay for winter feeding of cattle. During the spring and summer months, cattle graze on the sparsely-vegetated canyon lopes. Lime Point, at the upper limit of the .eservoir, contains valuable limestone deposits which would be developed if water transportation were available.

There is an existing county road paralleling Snake River from Asotin to the mouch of Grande Ronde River. This road provides access to several ranch headquarters and will require relocation for 23 miles. It is proposed to relocate this road above and parallel to the proposed pool. The relocated road will be constructed to the same standards as the existing one.

Estimated acreage requirements for flowage are based upon a normal pool elevation 842.5 plus a 5-foot freeboard. To this acreage an additional 20 percent has been added to account for blocked taking lines and reservoir access. Allowances have also been made for recreation, rights-of-way for relocations and access roads, and for acquiring an adequate work area at or near the dam site.

RECREATION

The National Park Service estimates that the present recreational use of 10,000 visitordays will increase to 30,000 visitor-days upon completion of the project. The facilities recommended by the National Park Service to accommodate the recreational use include 100 family picnic and camp units, one boat ramp, two miles of access road, and two boat docks. In addition, facilities such as access roads, viewpoints, overlooks, parking areas and sanitary accommodations will be provided at the dam by the construction agency to take care of visitors to the project structures. One or more boat launching ramps will be constructed on the reservoir near the dam to serve maintenance needs and for public recreational use.

FISH AND WILDLIFE

In addition to the fish passage facilities at the dam previously discussed, the fish and wildlife agencies recommend the following measures: additional investigation of the fish and wildlife resources and possible facilities and programs to compensate for anticipated losses or adverse effects; supplemental spawning facilities possibly in the form of artificial spawning channels; subimpoundments for rearing of game fish populations; acquisition of shorelands for waterfowl; and provision of access to hunting and fishing areas.

It is considered that relocation of existing roads as previously discussed will provide suitable access for bunting and fishing. Accordingly the project estimate does not include a specific item for access as recommended by the fish and wildlife agencies. With this exception, the facilities and programs set forth in the preceding paragraph have beer included in the project plan. On the basis of date currently available, however, the costs of the recommended compensatory measures appear to be excessive and possibly more than can be economically justified. The supplement tal spawning facility should be fully just ified either because of the loss of existing spawning area or for the purpose of enhancing the resource. Likewise, while it may be essential to provide subimpoundments for rearing game fish and to acquire lands for waterfowl, these measures should be fully justified either as replacements, if further studies show that a loss will exist, or for enhancement of the resource. In view of the above, the cost of the measures included in the project cost has been reduced from those shown in Appendix D, as follows: supplemental spawning facilities, reduced from \$1,500,000 to \$200,000; subimpoundments, reduced from \$400,000 to \$200,000; and acquisition of shorelands, reduced from \$150,000 to \$100,300. In addition, the estimated cost of required fish and wildlife investigations has been reduced.

CONSTRUCTION

The Asotin site is readily accessible on the left abutment and two roads approach the right abutment within 1.5 miles. Reservoir access would be provided by the relocated roadway previously discussed.

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A limited quantity of fine-grained material suitable for impervious embanionence occurs in the low-lying lands within the proposed reservoir stes, with considerably larger essentities on benches and the plateau adjacent to the site. Rock for slope protection could be obtained from the numerous rock cliffs in the area. On the right side of the river about 2 ulles from the site are large deposits of natural sand and fine gravels which can be used for filters and in concrete aggregate. While larger sizes of gravel occur in the benches on the left side of the river above elevation 860, the quality of this material may be such that it may be suitable only for embankment and not for concrete aggregate. In this case, crushed basalt would be available for manufacture of coarser aggregates.

For the first-step construction a diversion channel would be excavated on the left hank of the river in the navigation lock area and the cofferdam would inclose the powerhouse and five spillway bays adjacent to the right bank. Four of the spillway bays would be left low. The second-step cofferdam would inclose the navigation lock and one spillway bay. Diversion of the river during second-stage work would be through the four low spillway bays and the powerhouse skeleton units. The low splitway bays would be raised when all other project features requiring cofferdams are completed. It is not anticipated that navigation would be maintained through the site during the period of construction.

An estimated five years would be required for construction. The first year's program would include access roads, division channe! excavation, size clearing, and collerdan construction. The second-stage conferdance would be installed at the end of the third year. During the fourth and fifth years the navigation look would be completed and equipment installation in the powerhouse would also be in progress. Low spillway bays would be raised to final elevation during the last three months of the fifth construction year at which time the pool would be raised and the benerators placed in operation.

PROJECT COSTS

The construction cost of the Asotin project with three power units installed, based on July 1957 price levels, is estimated to be \$125,720,000 exclusive of the cost of navigation aids to be installed by the Coast Guard. These latter facilities are estimated to cost

\$171,000. Annual costs, including interest, saortization, operation, maintenance and interim replacements would be \$5,696,000. The addition of the fourth generating unit reutied to complete the ultimere installation would increase the construction cost by 95.560.000. A detailed cost estimate is comtained in Appendix E. A summary cost esclusive is shown helow-

Construction Costs

Festure	Estimaced ()st
Lands and damages	5 1.330.000
Relocations	1 209 309
Reservoir	50 000
Dams	19 930 100
Locks	29 600 000
Fish and wildlife	9 360 100 17
Powerplant	15, 230, 000
Roads	200 000
Changela	17,800,000
Recreation	160.000
Buildings, grounds,	
and utilizies	840.000
Permanent operating equipment	210,000
Construction facilities	5.330.050
Preauthorization studies	40,000
Engineering and design	4,450,000
Supervision and administration	7,676,000
	Contraction in the second second second second
Construction cost	\$125,709,000
laterest during construction	
fovestment cost	\$130.578,000
Naviestion aids by B -s	
Coast Gaard	121 000
Investment cost with	
Coast Guard Facilities	\$133,749,000
Annual Conts	
Interest and amostization	\$ 4,710,000
operation, mainteaute,	
Puer forcedus	939,000
Naviantion 14a	- 000 - 000
Date and reservate 04	- 000
Bacreation 11	
Buildings and group is 30	F 000
Fish facilities 90	000
Subtotal	\$ \$,690,000
Interest and amortization	
on Goast Guard factlinies	6,000
Total angual costs	\$ 5,696,000

1/ Direct cost. Total cost of these facilities including indirect and discributive costs is \$12,501,000. All costs are included in the above total.

ACCOMPLISHMENTS AND BENEFITS

The Asotin project would be operated in coordination with other projects in the region in the interest of system navigation and system power production. As an element of the Columbia-Snake River waterway, it will extend the authorized navigation system an additional 30 miles beyond Lewiston, in accordance with the plan proposed in House Document 531. The Asotin pool, which would be the uppermost unit in the system, would contribute 1,440,000 tons of traffic which would move to downstream points on the Snake and Columbia Rivers. The share of system navigation benefits creditable to the project, as shown in Chapter IV, is estimated to be \$2,155,000 annually.

The Asotin project would generate an average of about 1,708,000,000 kwh annually. Prime power at the project would be 168,000 kw and the power benefit, excluding the tax component, would be \$9,000,000. Other benefits associated with the project would be those accruing from recreational use of the teservoir. Applying a value of \$1.60 per visitorday to the estimated 20,000 visitor-days, annual increased use would result in a benefit of \$32,000.

ECONOMIC COMPARISON

A comparison of annual costs, excluding taxes, with project accomplishments follows:

Purpose	Accomplishment
Navigation Power Recreation	\$ 2,155,000 9,000,000 <u>32,000</u>
Total	\$11,187,000
Annual Costs	\$ 5,696,000
Justification Ratio	1.97

BENEFIT - COST COME

The power benefits allocable to the Asotin project, including the tax component of the alternative power cost, would be \$8,561,000. Combined with the navigation and recreation benefits set forth above, the total benefits creditable to the project would be \$10,748,000 The annual costs including taxes foregone would be \$6,444,000 which, when compared with the above benefits, results in a benefit-cost ratio of 1.67.

ALLOCATION OF COSTS

Construction and annual costs of the Asotin project, exclusive of recreation and U. S. Cosst Guard costs, are \$125,540,000 and \$6,418,000, respectively. These costs have been allocated by the separable costs-remaining benefits method to navigation and power, resulting in an allocation of 40 percent of the construction costs or \$50,241,000 to navigation and 60 percent or \$75,299,000 to power. Specific recreation costs of \$180,000 are assigned to that function. The cost allocation is presented in Table 36. This allocation is tentative and subject to adjustment based on actual costs incurred during project construction.

VIEWS OF INTERESTED AGENCIES AND PARTIES

The main expressions of interest have been forthcoming from those who desire early additional supplies of power and from those who strongly support the extension of navigation above Lewiston.

TABLE 36

ALLOCATION OF COSTS

Asotia Project

tem	Navigation	Power	Subtotal	Recta	ĭ <u>2≉a</u>] ≹
Beaclits	\$ 2,155,000	\$ 8,561,000	\$ 10,716,000	\$ 32,000	\$ 16.748,370
Alternative costs	3,997 000	4,751,000			
Benefits limited by alternative costs	2,155,000	4,751,000	6,906, 000		
Separable costs	1,667,000	2,421,000	4,088,000		
Remaining benefits	488,000	2,330,000	2,818,000		
Allocated joint costs	396,090	1,934,000	2,330,000		
Total annual costa	2,063,000	4,355,000	6,418,000	20,000	C.438,079
Taxes foregone		749,000	748,000		748. +14.
Annual costs, excluding taxes foregone	2,063,000	3,607,000	5,670 ,00 0	20,000	≦, se0, ki¢
Operation, maintenance and replacement allocation	181,000	786,000	967 ,000	13,000	3 8 0, V.44
Annual interest and amortization allocation	1,882,000	2,821,000	4,703,000	7,000	4,736,000
Capital investment allocation	53,381,000	80,006,000	133,387,000	191,000	133, 278, 100
Interest during construction	3,140,000	4,707,000	7,847,000	11,000	7,358,000
Construction cost allocation	50,241,000	75,299,000	123,540,000	180,000	125,720,-0a
1/ Exclusive of Coast Guard costs.					

83737 O-63 (Vol. 1)---34

299



22. The Asotin project recommended by the Division Engineer and the Board of Engineers for Rivers and Harbors for navigation and power would be economically justified by prospective power benefits alone. The navigation benefits, however, would depend almost entirely on the development, exploitation, and movement of limestore from deposits upstream from the Asotin site. In this matter, I have elso carefully considered additional information submitted by the proponents since the reports of the Division Engineer and the Board of Engineers for Rivers and Harbors. At this time, the uses of limestone from this source reasonably expected to develop and the savings in transportation costs are not sufficient, in my opinion, to warrant the inclusion of a lock for barge navigation. Realization of any navigation benefits from inclusion of a lock would also depend upon completion of the authorized downstream navigation facilities. Inclusion of locks in the Asotin project should, therefore, be deferred until further developments domonstrate their full economic justification. I find that the Asotin project, however, as a run-of-river power project, would afford a valuable and essential service for reregulation of the releases from upstream reservoirs. With an installation of 288,000 kilowatts, and with provisions for adding a navigation lock in the future, if developments warrant, the Asotin project would cost an estimated \$83,340,000, have annual charges of \$3,917,000, and a justification ratio of 2.31. Accordingly, I consider that the Asotin project should be included in the Major Water Plan for authorization at this time as a power only project, with provisions for the addition of a future lock when economically justified.

INFORMATION SHEET, ASOTIN SITE

Authorization - Project authorization by Congress, Flood Control Act of 1962.

Present Status - Project deauthorization by bill establishing Hells Canyon National Recreation Area, 31 December 1975.

Physical Status - Site located at river mile 146.8 approximately 5 miles upstream of Lewiston, Idaho. The site is at the upper end of Lower Granite reservoir, elevation 738.

Project - Run-of-river project with normal pool @ elevation 842.5, minimum pool elevation 837.5 (see note on potential project).

Power plant would include four 135 MM units installed initially with provisions to add one more unit if additional upstream storage developed.

Average Annual Energy	242	Ma	*
Dependable Capacity	621	MW	

Project Cost & Benefit - (1 July 1976 price level) **

Total estimated investment cost = \$341,000,000 (includes u/s &d/s fish migrant facilities)

Annual cost	≈ \$ 23,200,000
Power Benefits	= \$ 40,300,000
Benefit/Cost	= 1,7
Net Benefits	= \$ 17,100,000
Equivalent Oil Requirements	=.3,530,000 barrels of oil each year

Environmental Problems - Project was authorized in 1962 but was never funded. No comprehensive environmental studies were undertaken by the Corps.

<u>Potential Project</u> - The initial project scoped by the Corps of Engineers contemplate upstream development on both the Snake and Salmon River with a regulating dam at the China Garden site. Development on the Snake and Salmon has been foreclosed, hence a new higher Asotin project (elevation 830) could be scoped to provide greater benefits but still fall outside of the boundaries of the Hells Canyon National Recreation Area. Estimated project cost and benefits follow: **

Estimated Energy	330 NW * 21
Dependable Capacity	1844 MW
Estimated Project Investment Cost	\$540,000,000
Annual Cost	\$38,000,000
Annual Power Benefits	\$55,000,000
Benefit/Cost	= 1.4
Net Benefits	= \$17,000,000
Equivalent Oil Requirements	4,820,000 barrels of oil each year

• Does not include most recent analysis of probable irrigation withdrawals.

 Lased upon current FPC criteria of least costly alternative (oil-fired combustion turbines) at current prices with no escalation factor. This
Pyroach is being challenged by Corps of Engineers and others.

<u>Comments of the Corps of Engineers, Walla Walla District</u> <u>dated August 3, 1979</u>

- 1. The purposes of the study are discussed in the Introduction.
- 2. The report has been revised as suggested.
- 3. The discussion on anadromous fish runs has been expanded and revised.
- 4. According to the Idaho Department of Fish and Game, impoundment of the Middle Snake would essentially eliminate the white sturgeon there (see Appendix 2).



DEPARTMENT OF THE ARMY OFFICE OF THE ASSISTANT SECRETARY WASHINGTON, D.C. 20310

	13 AUG 1979		
Mr. Robert L. Herbst Assistant Secretary for Fish, Wildlife and Parks U.S. Department of the Interior Washington, D.C.	ASSISTEE SO FRANKEL A AND FA	179 AUG 15	
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Dear Mr. Herbst:

This is in response to your letter of June 15, 1979, requesting comments of the Department of the Army on your proposed report and EIS for the Snake Wild and Scenic River Study.

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Inclusion of the study reach in the National Wild and Scenic Rivers System would effectively forgo the option of future hydroelectric power development, including the Asotin Dam Project which is no longer authorized. In view of the increasing requirements for domestic energy production, the need to keep the power development option open should be fully considered.

The report does include information on hydropower development in the study reach, but this needs to be clarified. The description of the Asotin Dam Project on page 16 confuses that project with another potential project representing full development of this reach of the river. Some pertinent data on these two projects follow:

	Asotin Project (Limited Development)	Potential Project <u>(Full Development)</u>
Normal Pool Elevation	842.5	880.0
Average Annual Energy	242 MW	330 MW
Dependable Capacity	621 MW	844 MW
Net Annual Benefits	\$17.1 million	\$17.0 million

Based on 600 kilowatts of energy production per barrel of oil, the limited development project could reduce domestic oil consumption by about 3.5 million barrels and the full development project by over 4.8 million barrels annually. Mr. Robert L. Herbst

It also appears that Wild and Scenic River designation would conflict with commercial navigation use in the study reach. The River and Harbor Acts of 1902 and 1935 authorized maintenance of a navigation channel from Lewiston to Johnson Bar (91 miles). Under this program the Corps has provided deflection groins, rock removal and maintenance of the channel markers.

This river reach has long been a navigable water of the United States because of the historic, present, and future use for commercial navigation.

Any plan recommended for authorization should protect and provide for continued commercial navigation, and the report should clarify the impact of the preferred plan on commercial navigation, especially the impact on future limestone mining and transport. The report is inconsistent with information presented by your Department in brochures and public meetings in that the preferred plan would apparently prohibit the mining and use of this valuable resource. It is suggested this matter be clarified and that further consideration be given to the future utilization of these limestone deposits in the event the reach is included in the Wild and Scenic River System.

Table 8 is somewhat confusing and contains statements on impacts which do not appear to be supported by material in the report. We suggest that this display be reviewed for clarity and for consistency with the balance of the report.

A final comment concerns U.S. Army Corps of Engineers Regulatory Permit authority which was not addressed in the report. The Corps regulates the use of Waters of the United States under provisions of the River and Harbor Act of 1899 and the Clean Water Act. Construction or other activities in waters of the United States will likely require Corps permits.

The opportunity to review the report is appreciated, and I hope these comments will be of assistance in perfecting your report.

Sincerely,

. chul Bunef

Michael Blumenfeld Assistant Secretary of the Army (Civil Works)

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Comments of the Department of the Army dated August 13, 1979

- 1. Information about the power benefits and costs of a dam at Asotin has been added to the report.
- 2. There is no conflict between the present amount of use for commercial navigation occurring on the study segment and other uses. Conflicts could develop in the future depending upon the nature and extent of the various kinds of competing uses.
- 3. The report has been revised to indicate that development of the limestone deposits would be possible under the recommended plan.
- 4. Table 8 (now Table 10) has been substantially revised.
- 5. The report has been revised to mention the Corps responsibilities under the River and Harbor and Clean Water Acts.



to be and the well 25, 197. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT WASHINGTON, D.C. 20410

115 JUL 1929

OFFICE OF THE ASSISTANT SECRETARY FOR COMMUNITY PLANNING AND DEVELOPMENT

> Honorable Robert L. Herbst Assistant Secretary Department of the Interior Washington, D. C. 20240

Dear Mr. Herbst:

This is to inform you that the Draft Environmental Impact Statement on the proposed Snake National Wild and Scenic River Report which you sent to Secretary Patricia Roberts Harris on June 15, 1979, has been referred to our Seattle Regional Office, which has the responsibility for direct comment.

Thank you for giving this Department the opportunity to comment.

Sincerely,

Robert C. Embry, Jr Assistant Secretary

169



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT REGIONAL OFFICE ARCADE PLAZA BUILDING, 1321 SECOND AVENUE SEATTLE, WASHINGTON 98101

August 2, 1979

REGION X

IN REPLY REFER TO:

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Office of Community Planning and Development

> Honorable Robert L. Herbst Assistant Secretary Department of the Interior Washington, D.C. 20240

Dear Mr. Herbst:

Re: Snake Wild and Scenic River Study Draft Report/Environmental Statement

Your statement and report were referred to me for response.

I find no objection to the recommended plan to add the 11-mile river segment between Grand Ronde and the Wallowa-Whitman National Forest boundary as a scenic river and to allow the states of Idaho and Washington to assess the possibility of their administering the 22 miles downstream from Grande Ronde. I believe this is consistent with the outdoor recreation plans for both states. I also find no conflict of the recommended plan with any of our programs.

Thank you for the opportunity to comment.

Sincerely,

Robert C. Scalia Director Regional Office of CPD

170

AREA OFFICES Portland, Oregon • Seattle, Washington • Anchorage, Alaska • Boise, Idaho Insuring Office Spokane, Washington

U.S. ENVIRONMENTAL PROTECTION AGENCY



REGION X 1200 SIXTH AVENUE SEATTLE, WASHINGTON 98101

ATTN OF: M/S 443

JUL 26 1979

Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

Dear Mr. Dickenson:

The Environmental Protection Agency has completed its review of your draft environmental statement for the Snake River Wild and Scenic River Study. We believe the proposed plan would be largely beneficial from the standpoint of public health and environmental quality. Provision of adequate sanitation facilities to accommodate increased recreational use is essential. We also encourage coordination with local public health and sewer agencies to ensure that increased residential development in the river corridor does not impair water quality.

The Environmental Protection Agency has rated this draft statement LO-1 (LO - Lack of Objections; 1 - Adequate Information). This rating will be published in the <u>Federal Register</u> in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act, as amended.

Thank you for the opportunity to review this draft statement.

Sincerely,

Sleyander B. Smith

Alexandra B. Smith, Chief Environmental Evaluation Branch

ADDRESS ONLY THE DIRECTOR. FISH AND WILDLIFE SERVICE



United States Department of the Interior

FISH AND WILDLIFE SERVICE WASHINGTON, D.C. 20240

In Reply Refer To: FWS/ES

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Memorandum

To: Director, National Park Service

From: Director, Fish and Wildlife Service

Subject: Snake River (Washington, Idaho, Oregon) Wild and Scenic River Study--Comment on Department's Combined Draft Report and Environmental Statement (DES 79-35)

We have reviewed the subject document in response to Assistant Secretary Herbst's letter of June 15 and offer the following comments.

1. In general, the impacts on fish and wildlife resources are adequately presented. The Recommended Plan (Alternative 1) provides for the U.S. Forest Service to manage the upper 11-mile segment of the river and for the States of Idaho and Washington to administer the lower 22 miles. This plan offers protection of fish and wildlife resources provided the states arrive at a joint management plan which is acceptable to the Secretary of the Interior. We understand that if a joint plan acceptable to the Secretary is not developed, the 22-mile section of the river would be recommended for U.S. Forest Service administration.

Our concerns are related to the preservation of anadromous fish resources within the Columbia River System of which the study portion of the Snake River is a major part. The area supports spawning and rearing habitat for fall chinook salmon and steelhead trout. Passage and rearing for spring and summer chinook and steelhead also occur there. One or more of these activities occur every month of the year within the study area.

Water development projects upstream and downstream of the study area have contributed to the decline of anadromous fish runs in the Snake River to the extent that spring, summer, and fall chinook and steelhead trout are presently being evaluated for possible listing under the Endangered Species Act. It would be a definite advantage to the National Park Service and the U.S. Forest Service to fully consider these fish species in any wild and scenic river designation, as proposed. The Fish and Wildlife Service would be opposed to any river management activity producing an incremental reduction in anadromous fish habitat. The management plan should fully consider the projected impacts in relation to the past adverse developmental impacts on this river segment. Restoration of the habitat should be a part of the plan.

2. <u>Flora</u>, page 43. The plant species named in the first paragraph are proposed, rather than officially listed in the Federal Register of June 16, 1976, for Endangered status. The exact distribution of those named species vis-a-vis the study area, as well as the impact on them of wild and scenic river designation, as proposed, needs further investigation. It is possible that <u>Steironema laevigatum</u> may be deleted from the proposed Endangered status listing.

The following taxa should also be added on page 43. All are under notice of review as threatened plants in the July 1, 1975 Federal Register, and are in, or likely to be in, the study area:

Apiaceae

Lomatium rollinsii

Lomatium serpentinum (may be deleted from candidate list)

Boraginaceae

Hackelia hispida (may be deleted from candidate list)

Liliaceae

<u>Allium tolmiei</u> var. <u>persimile</u>

Rosaceae

Rubus bartonianus

3. <u>Impacts on Soil and Vegetation</u>, page 59. The second paragraph under this heading should be strengthened by adding the following sentences: "All plants which are candidates (under notice of review or proposed in the Federal Register) for listing in the Federal Register as Threatened or Endangered will be treated as listed until investigation proves them ineligible for that status. Management plans for a designated wild and scenic river will provide for measures to avoid jeopardizing the continued existence of the candidate species in the river corridor."

4. Miscellaneous.

On page 33, Map 7 (Topography) would be improved by showing the northern and southern termini of the study area and by lowering the "Wallowa-Whitman National Forest" lettering. The northern boundary of the forest (southern

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terminus of the study area) coincides with the top edge of the lettering block, and the position of the name gives the impression that the forest extends several miles north as well as south of the lettering.

On page 54, last paragraph, the statement..."that portion of the study area below the National Recreation Area will likely remain intact except for minor continued residential subdivision of lands adjoining the river..." appears to be inconsistent with the last paragraph on page 55 which states that "a considerable amount of development could still occur."

We appreciate the opportunity to review and comment on this draft document.

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Comments of Fish and Wildlife Service dated August 10, 1979

1. The report has been revised as suggested.

FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, D.C. 20426

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27 AUG 29 AM 9 29

AS TITLE SECRETARY FINE TO WILDLIFE ARKS In Reply Refer To:

OEPR-DRB Cooperative Studies Draft Environmental Statement and Wild and Scenic River Study -- Snake River

AUG28 1979

Robert L. Herbst Assistant Secretary U.S. Department of the Interior Office of the Secretary Washington, D.C. 20240

Reference: L53 (130)

Dear Mr. Herbst:

This is in response to your letter of June 15, 1979, addressed to the attention of the Acting Assistant Secretary, Environment, within the Department of Energy, requesting comments on the draft environmental statement and wild and scenic river study on the proposed Snake National Wild and Scenic River prepared by the Pacific Northwest Region, National Park Service, Department of the Interior.

The study document proposes Federal and State actions to include a 33-mile segment of the Snake River bordering the States of Washington, Idaho, and Oregon in the National Wild and Scenic Rivers System. The study assessed that the upstream 11 miles of the Snake River from the confluence with the Grande Ronde qualify for Scenic classification, while the downstream 22 miles qualify for Recreational classification.

As its preferred alternative, the study document recommends administration of the upper 11-mile river segment by the U.S. Forest Service and joint administration of the remaining 22-mile river segment by the States of Idaho and Washington. Should these States choose not to prepare a management plan for the protection of the natural qualities Mr. Robert L. Herbst

of the Snake River by the time Congress is ready to consider the proposal, the preferred alternative reverts to alternative six whereby the entire 33-mile river segment is added to the National River System under Forest Service Administration.

The comments of the Federal Energy Regulatory Commission's Office of Electric Power Regulation (OEPR) are made in accordance with the November 29, 1978, CEQ Regulations for the Implementation of the Procedural Provisions of the National Environmental Policy Act of 1969 and pursuant to the provisions of the Wild and Scenic Rivers Act (P.L. 90-542, as amended). The Commission's principal interests in programs affecting land and water resources concern the possible effect of such programs on the development of hydroelectric power under the Federal Power Act and the construction and operation of natural gas pipelines under the Natural Gas Act.

Staff review reveals that there are no existing hydropower developments in the river segments considered for inclusion in the National Wild and Scenic Rivers System but that there are two sites for potential developments. The Asotin site, located near the downstream study terminus, is estimated to have a generation potential of about two billion kilowatt-hours of energy annually. This project had been authorized for construction by the Corps of Engineers under the Flood Control Act of 1962, but was deauthorized in 1975 by the Act establishing the Hells Canyon National Recreation Area. Corps investigations had indicated that a 540-megawatt installation would have been economically feasible at Asotin. At present, the Pacific Northwest Generation Co. has an application for a preliminary permit pending before the Commission. The project (FERC Project No. 2925) described therein includes possible development at the Asotin site approaching 384,000 kilowatts of capacity.

The China Garden site, located near river mile 176 in the upstream river segment, is estimated to have a generation potential of about 1.1 billion kilowatt-hours of energy annually. There are no known plans at present for development of the China Garden site.

Should the 33-mile segment be included in the National Wild and Scenic Rivers System, the development of hydroelectric generation at these sites could be precluded indefinitely. The amount of generation foregone at these two sites would amount to over three billion kilowatt-hours annually or the equivalent energy output of over five million barrels of oil per year. 1

Mr. Robert L. Herbst

According to information available to this office, there are no natural gas pipelines within the 33-mile river segment bordering Washington, Idaho, and Oregon. Further, as of August 1978, there was no oil or gas exploration or production within the study area.

-3-

The final environmental statement and wild and scenic river study report should identify the possible foreclosure of hydroelectric generation. This recognition of preclusion of a renewable resource is in accordance with the Nation's Water Policy now being implemented, the National Environmental Policy Act, and the national concern for reliance on foreign oil.

We appreciate the opportunity to have reviewed this draft document.

Sincerely,

Hidron 9. Jonkon

William W. Lindsay, Director Office of Electric Power Regulation

Comments of Federal Energy Regulatory Commission dated August 29, 1979

1. Construction of a dam at the China Garden site was foreclosed by Congress in 1975 when it established the Hells Canyon NRA. The dam site is located only 5 miles downstream from the north bound ary of the NRA.

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August 3, 1979

Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

Dear Mr. Dickenson:

The Waterways Committee of the Greater Lewiston Chamber of Commerce recommends that county control be continued as the appropriate jurisdiction over the 33-mile portion of the Snake River south of Asotin, Washington. That section of the Snake River is currently under study for inclusion in the National Wild and Scenic River System.

Historically that section of the Snake River has been unrestricted to local residents of the Area for recreational use. Our committee feels that should continue. Inclusion of the river into any national or state system would result in a serious deterioration of the quality of life we now enjoy. Local governments have expressed a willingness to cooperate and coordinate their efforts to preserve the river from exploitation. Much more can be done if they are allowed to continue in this direction.

180

On behalf of the Waterways Committee I want to thank you for the opportunity to express our view.

Waterways committee members

Best regards, Irv Faling, Chairman Waterways Committee

OFFICES IN PARK PLACE - LEWIS CLARK LEWISTON, IDANG 83501 208 743-3531



Seaport of Idaho

Jack M. Gruber 904 18th Avenue Lewiston, ID 83501 August 6, 1979

Mr. Russell E. Dickenson, Regional Director Pacific Northwest Region, National Park Service 601 4th & Pike Building Seattle, Washington 98010

Dear Mr. Dickenson:

I wish to go on record as favoring local (County) control of the 33 mile segment of the Snake River south of Asotin, Washington being considered by the Park Service. I specifically wish to note my oposition to federal control under the current proposal to include that segment in the National Wild and Scenic Rivers System.

Idaho already has more than its share of land area under federal control in wilderness areas, national parks, U. S. Forest Service, Bureau of Land Management, etc.

I simply do not favor more restrictive classification for another chunk of Idaho real estate.

Thank you for this opportunity to express my personal views of a matter of considerable interest to me.

Sincerely,

A Star March and And

Jack M. Gruber

JMG/ljc

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United States Department of the Interior

GEOLOGICAL SURVEY RESTON, VIRGINIA 22092

In Reply Refer To: EGS-Mail Stop 441 July 17, 1979

Memorandum

- To: Chairman, Interdepartmental Study Group on Wild and Scenic Rivers
- From: Geological Survey Representative
- Subject: Snake Wild and Scenic River Study, Draft Report/Environmental Statement

The Department's draft report/environmental statement on the Snake Wild and Scenic River has been reviewed by personnel in our Portland, Oregon, office. The reviewer's comments are enclosed. Thank you for giving us the opportunity to review this report.

Thomas J. Buchanan

Enclosure



UNITED STATES DEPARTMENT OF THE INTERIOR

GEOLOGICAL SURVEY Water Resources Division P. O. Box 3202 Portland, Oregon 97208

July 9, 1979

Memorandum

To: Acting Assistant Chief Hydrologist for Operations, WRD, Reston, Va., MS 441

From: District Chief, WRD, Portland, Oreg.

Subject: PUBLICATIONS--Snake Wild and Scenic River Study, Draft Report/Environmental Statement

As requested in your memorandum of June 27, subject Draft EIS has been reviewed by this office. In our opinion, this version of the report is satisfactory and the treatment of hydrology, geology, and geography is adequate for the intended purpose. The EIS briefly considers eight alternatives to the recommended plan, for which environmental impacts are assessed in detail. Although the discussion of each alternative is short, we believe the differences from the recommended plan are adequately discussed.

Laputha lanley 2.

Stanley F. Kapustka



UNITED STATES DEPARTMENT OF THE INTERIOR

GEOLOGICAL SURVEY

WATER RESOURCES DIVISION Box 036 Federal Building, Room 365 550 West Fort Street Boise, Idaho 83724

July 30, 1979

Mr. Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, WA 98101

Dear Mr. Dickenson:

Subject: Snake Wild and Scenic River Study, Draft Report/Environmental Statement, DES 79-35

We have no comments regarding subject environmental statement, other than the following:

The U.S. Geological Survey has operated a streamflow gaging station at river mile 167.2 since 1958. Hydrologic data collected at this site provide essential information for operation of the Lower Granite project of the U.S. Army Corps of Engineers. Continuation of this gaging station in the forseeable future must be considered, regardless of the alternative selected by this environmental statement.

Sincerely yours,

E.F. Huller

E. F. Hubbard District Chief

Comments of Geological Survey dated July 30, 1979

1. The report has been revised to state that continued operation of the USGS gaging station at river mile 167.2 would be unaffected.

Baker, Oregon. May 30, 1979.

Regional Director, Pacific Northwest Region, Natihal Park Service, 601 Fourth and Pike Building, Seattle, Washington 98101

Dear Sir:

I have reviewed your "Snake and Sild and Scenic Liver Study draft and EIS report and find it good.

I agree with your preferred plan, alternative No. 1.

Map 9, Land Ownership and Road Access, has one error I think. It shows Sec. 1, T. 5 N., R. 48 E. J.K. as BLM when it is actually national Forest.

Sincerely, (

W.B.Hall 3190 Third Baker, Oregon. 97814

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dated	May	30,	19	79

1. The map indicates that the section in question is national forest.

118 Sycamore St. Clarkston, Wa. 99403 August 6, 179

RUSSELL E. DICKENSON 601 Fourth andPike Building Seattle, Wa. 98010

DEAR SIR:

WE ARE VERY MUCH AGAINST FEDERAL CONTROL OVER THE 33 MILE PORTION OF THE SNAKE RIVER SOUTH OF ASOTIN. THE CONTROL OF THIS AREA SHOULD BE UNDER THE JURISDICTION OF THE COUNTIES.

We who live in the valley realize the importance of this area and what it means to us and tourists who visit here. We should control it, not the federal government. The ferderal government already controls too much of our areas for recreation, and the more land the government controls, the less recreation we have.

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RUSSELL E, DICKENSON, REGIONAL DIRECTOR PACIFIC NORTHWEST REGION NATIONAL PARK SERVICE<601 FOURTH AND PIKE BLDG SEATTLE WA 98101

DEAR MR. DICKENSON,

THE HELL'S CANYON PRESERVATION COUNCIL HAS REVIEWED THE SNAKE WILD AND SCENIC RIVER STUDY DRAFT REPORT-ENVIRONMENTAL STATEMENT AND FINDS THE DATA TO BE WELL RESEARCHED AND PRESENTED.

WE AGREE WITH THE RECOMMENDED RIVER PLAN AS DUTLINED AND THE MANAGEMENT OBJECTIVES,

SINCERELY,

JOHN A.K. BARKER, PRESIDENT HELL'S CANYON PRESERVATION COUNCIL 2124 GRELLE LEWISTON ID 83501

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United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE WASHINGTON, D. C. 20240

IN REPLY REFER TO:

AUG & 1379

Memorandum

To: Director, National Park Service

From: Director, Heritage Conservation and Recreation Service

Subject: Draft Snake Wild and Scenic River Study Report and Environmental Statement

We have reviewed the subject draft report and environmental statement as requested.

We concur in the finding of eligibility and recommendation for inclusion of the 33-mile segment of the Snake River from Wallowa-Whitman National Forest to Asotin, Washington, in the National Wild and Scenic Rivers System. Our Northwest Regional Office participated in the design, development and formulation of alternatives of the study during the time that these functions were the responsibility of this agency. We continued to coordinate closely with Park Service staff after the transfer of functions between our agencies and generally believe our concerns are adequately addressed in the document.

We do, however, have a serious problem with one recommendation made in the report. On page 63 under Mitigating Measures, the report states: "The recommended plan proposes that legislation adding the river to the National System specifically exempt it from any minimum flow requirements, similar to the act which established the Hells Canyon National Recreation Area." The cited act, P.L. 94-199, provided among other things: "No flow requirements of any kind may be imposed on the water of the Snake River below Hells Canyon Dam under the provisions of the Wild and Scenic Rivers Act (82 Stat. 906), of this act, or any guidelines, rules, or regulations adopted pursuant thereto." This provision would apply to <u>all</u> segments of the Snake downstream from Hells Canyon Dam including the subject study segment unless the provision were to be revoked in future legislation. We recognize that the provision may be necessary to secure congressional designation of the subject segment, but we feel that it would set an unfortunate precedent for the study report to recommend this provision, and thereby give it the status of Departmental policy. Therefore, since the existing legislation already provides that Federal reserved water rights will not be invoked, the report need only reaffirm this fact.

We thank you for the opportunity to review the Snake Wild and Scenic River Study Draft Report/Environmental Statement and we hope you will find our comments helpful.

Lor Chris Therral Delaporte gine

2.

Comments of Heritage Conservation and Recreation Service dated August 8, 1979

1. The report has been revised as suggested.



IDAHO POWER COMPANY

BOX 70 BOISE, IDANO 83707

JAMES E. BRUCE PRESIDENT & CHIEF EXECUTIVE OFFICER August 21, 1979

Mr Russell E Dickenson Regional Director Pacific Northwest Region National Park Service 601 - 4th & Pike Building Seattle, Washington 98101

> Re: L5815 (PNR)PCR Snake River - Comments on Draft Study Report/ Environmental Statement

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Dear Mr Dickenson:

We have reviewed the Snake Wild and Scenic River Study Draft Report/Environmental Statement, Department of the Interior, National Park Service, April, 1979. We do not agree with the recommendations in the report on a number of items, most of which we will not attempt to detail.

The important factor so far as Idaho Power Company is concerned is that the report does not give adequate consideration of the power benefits of the Asotin Dam to the region. In a time when our region is facing a shortage of electrical power, we believe that adequate consideration has certainly not been given to the benefits of a hydroelectric development, which will have a very minor effect on the environment and utilizes a renewable resources, as compared to the alternative of construction of other types of plants which would use oil or gas, coal or nuclear, and have a resultant much harsher effect on the environment. We believe consideration should be given to the benefits of hydroelectric generation and we also believe this is in accordance with the intent of Congress and of the vast majority of the people in the region.

Sincerely, James E Bruce

President and CEO

JEB:mlm

Comments of Idaho Power Company dated August 21, 1979

1. Information about the power benefits and costs of a dam at Asotin has been added to the report.

Ideal Basic Industries Cement Division

Exploration Department P.O. Box 1949 Fort Collins, Colorado 80521 303 452 5600 (1) 138) 442 5600 (1) (300) 432 5600 (1)



October 12, 1979

Mr. Stanford Young National Park Service Fourth & Pike Building Seattle, WA **9**8101

RE: L58 (PNR) PCR, Snake River

Dear Mr. Young:

Thank you for the copy of the National Park Service study entitled, "Snake, Wild and Scenic River; Draft Report/Environmental Statement."

Of the alternatives given, we would prefer Option No. 2 calling for no action. Any restricting classification at this time seems premature. With so many present uncertainties, the administration of these lands should remain as flexible as possible, giving citizens opportunities to adjust to new future and unknown demands on these resources. We fail to see any immediate urgency in locking up this area for recreational use only, especially in the light of the report's statement on Page 54 as follows:

"In summary, during the foreseeable future, that portion of the study area below the National Recreational Area will likely remain intact, except for minor continued residential subdivision of lands adjoining the river, and a continued increase in recreation use. . . . "

Alternative No. 3 would be our second choice. Any control imposed on the area could be better handled by a local agency rather than by the federal government, because the local people know the area, its potential, and many depend on this area for their living and livelihood. The report states (Page 17) that for the 22-mile segment below the Grande Ronde, "most use is by residents living downstream in the Clarkston-Lewiston area." On Page 58 it is pointed out that without national recognition, increased demand would be no more than 5 percent per year. With national recognition, this demand would be 10 percent, or twice the amount, if no classification were enacted.

If the recommended plan (Alternative No.1) is to be considered, we believe that the scenic portion of the river should begin several miles upstream from its present proposed location at the confluences of the Grande Ronde and Snake. By moving the boundary upstream, it would less jeopardize the ultimate extractions of the limestone deposit on Lime Point. The nine homes at Rogersburg, upstream from the confluence of these two rivers, is not compatible with the scenic river designation in our opinion.

Regrettably, the report understates the importance of this limestone deposit just above Rogersburg. Contrary to the report, commercial deposits of limestone are not abundant in the Pacific Northwest. In southeastern Washington, the limestone deposits straddling the river are the only commercial deposits in this general area. Farmlands in this area are reportedly badly in need of lime as a soil additive, yet lime is seldom added to the soil because of the high costs of the imported material.

Concerning limestone, the report seems to contradict itself when it states in one place that, "limestone has never been developed in this area" and elsewhere states, "many limestone claims were located and lime kilns built."

We are at a loss to explain why the 700 mining claims presently in this area will be allowed to continue their development and that new claims may be located and worked, subject to regulations of the Secretary, while the development of the limestone deposits cannot be permitted to occur (Page 57).

The past is the key to the future. We know that solutions to what today seem to be insurmountable problems will be found. Mining can be compatible with recreation and other uses. Priorities change---no longer do we cherish deposits of flint needed for arrowhead manufacture, . . no longer do we ignore the shining cliffs of molybdenum that had no value at the turn of the century. A "lock-up" is not fair to the local community nor to future generations. Keep options open and flexible. . . retain the multiple use concept for this 33-mile portion of the Snake.

Sincerely,

R. P. Comstock Director of Exploration 198

TCS:iem

Page 2

Comments of Ideal Basic Industries dated October 12, 1979

1. The report has been revised to indicate that development of the limestone deposits would be possible under the recommended alternative.

State Of Idaho



DIVISION OF BUDGET, POLICY PLANNING AND COORDINATION EXECUTIVE OFFICE OF THE GOVERNOR

STATE CLEARINGHOUSE AUGUST 8 1979

JOHN V. EVANS Governor Statehouse Boise, Idaho 83720

RUSSELL DICKENSON, REGIONAL DIRECTOR NATIONAL PARK SERVICE 601 FOURTH & PIKE BLDG SEATTLE, WASHINGTON 98101

THE STATE CLEARINGHOUSE HAS COMPLETED REVIEW OF THE SNAKE RIVER; WILD & SCENIC RIVER DRAFT REPORT/EIS (L5815(PNROPCR SNAKE RIVER) (OUR SAI#00/92627). THE FOLLOWING AGENCIES RECEIVED STATEMENTS AND WERE ASKED TO REVIEW AND COMMENT:

NATURAL RESOURCES BUREAU; DIVISION OF BUDGET, POLICY PLANNING & COORDINATION CLEARWATER ECONOMIC DEVELOPMENT ASSOC (MOSCOW, ID) IDAHO DEPT OF LANDS IDAHO DEPT OF FISH & GAME IDAHO DEPT OF PARKS & RECREATION

NO COMMENTS WERE RECEIVED DURING THE CLEARINGHOUSE REVIEW, CLEARWATER ECONOMIC DEVELOPMENT ASSOCIATION INDICATED SUPPORT BUT OFFERED NO COMMENTS. THANK YOU FOR THE OPPORTUNITY TO REVIEW THIS PROPOSAL. WE LOOK FORWARD TO THE FINAL ASSESSMENT WHEN IT BECOMES AVAILABLE.

SINCER

PAM DEMO-RYBUS COORDINATOR

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LEWIS-CLARK VALLEY CHAMBERS OF COMMERCE

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August 1, 1979

Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

Dear Mr. Dickenson:

RE: Snake River Wild and Scenic River Study

The Greater Lewiston and Clarkston Chambers of Commerce support and endorse county control of the 33-mile portion of the Snake River south of Asotin, Washington. This position is not listed as one of the nine suggested alternatives and should not be confused with Alternative 2 - No Action.

The county commissioners of Nez Perce, Asotin and Wallowa Counties are willing to take the necessary actions to protect the river corridor while allowing traditional recreation access to the river. This protection can be done through local governmental units using appropriate zoning and other ordinances, local purchase or other actions. It would retain responsible and responsive local control to the residents of the area. Our chambers of commerce are working with local elected officials to develop a plan which would provide the necessary controls.

Inclusion of this section of the river into the National Wild and Scenic River System would, as a matter of course, cause this section of the river to receive national publicity. That would result in a large increase in use and destroy what we are working to save. Oregon and Washington do have Scenic River Acts. However, Idaho does not. Including this portion of the river in state designated systems would still not provide the local control that residents of the valley desire.

The joint recommendation of the valley chambers of commerce is for county control of the 33-miles of the Snake River under study.

Best_regards, Bartins C.

Burton Wood, President Lewiston Chamber of Commerce Best regards,

Plan Stranger Stranger

Al Krueger, President Clarkston Chamber of Commerce

lmr

NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION 1800 Massachusetts Avenue, N.W. Washington, D.C. 20036/202-857-9500 NREC

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August 9, 1979

Mr. Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building 98101 Seattle, Washington

Dear Mr. Dickenson:

On behalf of the National Rural Electric Cooperative Association (NRECA), I wish to comment on the draft study report/environmental statement for the Park Service's proposal to designate a 33-mile portion of the Snake River as a National Wild and Scenic River. By way of introduction, NRECA is the national service organization of approximately 1,000 non-profit, consumer-owned cooperatives which provide electric utility service in the rural and sparsely populated agricultural areas of 46 states, including Washington, Oregon and Idaho. NRECA and its members have a longstanding interest in both the environmental and energy-related concerns of this nation.

Having reviewed the draft study/environmental statement, 1 have serious reservations concerning its sufficiency and objectivity. The most significant deficiency in the report, from the standpoint of the National Environmental Policy Act, the Wild and Scenic Rivers Act and the Water Resource Council's Principles and Standards, is the failure to seriously consider those alternatives which would allow for the construction of a hydroelectric project in or near the study area. The lack of adequate consideration in this regard is particularly disturbing (and, I believe, fatal) in light of the current energy crisis, the President's stated goal of reducing this country's dependence on oil, the inherent environmental benefits


Mr. Russell E. Dickenson Page 2

of hydroelectric power, and the dearth of potential sites for significant hydroelectric projects to help meet this nation's electric energy requirements.

The study report is written from the point of view that the Asotin dam, authorized in 1962, was forever foreclosed with its deauthorization as a Corps of Engineers project in 1975. The validity of the assumption is highly questionable. Indeed, the Pacific Northwest Generating Company currently has pending with the Federal Energy Regulatory Commission an application for a preliminary permit for a hydroelectric project at Asotin. Far from giving any serious consideration to the application, the study report does not even acknowledge it.

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At page 71 the report does acknowledge that "increasing energy needs could make construction of a dam or dams more attractive." That statement, however, seems to ignore the fact that we are currently in the midst of an energy crisis. To foreclose development of a significant source of hydroelectric power under the present circumstances is shortsighted. The relative advantages of hydroelectric power over that generated by coal, oil or nuclear fuel are significant. The study report fails to analyze the effects of relying on alternative sources of power to help cover the projected power supply deficits in the Northwest if hydroelectric development at Asotin is foreclosed by inclusion of the 33-mile segment in the System. The various alternatives considered in the study report must be measured, in part, against the alternatives to hydroelectric power. Nowhere is this even hinted at in the report.

By and large, the report all but ignores the energy issue. There is no serious effort made to evaluate or describe the potential uses of water which would be foreclosed if the segment of the river studied were included in the National Wild and Scenic River System. Certainly the report evidences no serious evaluation of the economic benefits that would be foregone if the potential for hydroelectric development at Asotin were foreclosed as a result of including the segment studied in the System. Consequently, the study does not comply with NEPA, the Wild and Scenic Rivers Act or the Principles Mr. Russell E. Dickenson Page 3

and Standards.

In order to fulfill the requirements of the various statutes involved, the report and environmental statement on the study area must adequately address the tradeoffs involved in choosing an alternative. The tradeoffs between general inclusion (as in alternative 1) and limited inclusion (as in alternative 9) are not fairly presented. Energy needs are nowhere weighed against the need for 14 more scenic rivers. This is particularly disappointing in light of the discussion on pages 24 and 28 of the report which lists: eight major federally admininistered recreation areas within a 100-mile radius of the study area, seven rivers in the National Wild and Scenic Rivers System within the three states bordering the study area, and six rivers in two of the states which are either proposed for or under study for inclusion in the National System.

I think, in particular, the Park Service must take another look, this time giving sufficient, serious consideration to alternative 9 in view of the energy crisis and the existence of other recreation areas and wild and scenic rivers in the three states involved.

Respectfully submitted, Opany B. Kandall

Randall guYatory Counsel

GBR/jh

Comments of National Rural Electric Cooperative Association dated August 9, 1979

- 1. The report has been revised to include references to the April 1979 application by the Pacific Northwest Generating Company for a preliminary permit to construct Asotin Dam and to include additional information about the costs and benefits of such a dam.
- 2. To "analyze the effects of relying on alternative sources of power to help cover the projected power supply deficits in the Northwest if hydroelectric development at Asotin is foreclosed" is beyond the scope of this study.
- 3. The report has been revised to include information about future power deficits in the Pacific Northwest.
- 4. No study has been made to define the Nation's need for wild and scenic rivers. However, with only 28 river segments having a total of 2,317 miles of river in the National Wild and Scenic Rivers System, it would be difficult to conclude that there is an overabundance of that resource.

NWPPA
Northwest Public Power Association

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1310 Main Street P.O. Box 1307 Vancouver, Washington 98666 (206) 694-6553 (503) 226-0320

July 31, 1979

Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth & Pike Building Seattle, WA 98101

Dear Mr. Dickenson:

The following comments relating to the Snake Wild and Scenic River Study Draft Report/Environmental Statement (prepared by the National Park Service) are submitted for your consideration. For your information, the Northwest Public Power Association (NWPPA) is a regional trade association representing more than 130 consumer-owned electric utility systems in the Pacific Northwest.

After analyzing the Draft Report as it specifically relates to the potential Asotin Hydroelectric Dam, it is our analysis that:

1. The Draft does not take into account the potential economic and energy-related benefits available through the development of this hydroelectric facility.

2. The Draft does not take into account the economic and energy related results of precluding the development of potential hydroelectric facilities, specifically the proposed Asotin project.

3. The Draft does not take into account the present energy crisis which currently exists today, or the future energy deficits faced within this region. (See Attachment A)

NWPPA believes that hydroelectric generation provides the most efficient, renewable, economical and clean source of generation. NWPPA also believes that the rivers of this region should be available for multiple uses and the potential of the rivers should be developed in an environmentally acceptable way for the benefit of all the people in this region. Page 2.

Finally, NWPPA supports and endorses the Pacific Northwest Generating Company's (PNGC) application with the Federal Energy Regulatory Commission for a preliminary permit for the Asotin Hydroelectric dam.

If our Association can assist you further in this study, please contact my office.

Sincerely, NORMAN C, JACOX General Manager

NCJ:bf

ATTACHMENT "A"

Regional Power Supply Deficits 1979-80 West Group Forecast

	Deficit		
Operating Year	Peak (MW)	Energy (MW avg)	
1979-80	254	1,599	
1980-81	1,359	2,214	
1 981-82	846	1,998	
1982-83	2,514	2,499	
1983-84	345	2,835	
1984-85	1,484	2,611	
1985-86	712	2,018	
1986-87	(432)	1,162	
1987-88	(544)	1,016	
1988-89	(195)	1,034	
198 9-90	282	1,020	
1990-91	2,155	1,751	
1991-92	3, 986	2,713	
1992-93	5,974	3,725	
1993-94	8,006	4,768	
1994-95	10,100	5,856	
1 995-96	12,312	6,974	
1996-97	14,485	8,039	
1 997- 98	16,687	9,189	
1998-99	19,044	10,342	

Comments of Northwest Public Power Association dated July 31, 1979

- 1. Information about the power benefits and costs of a dam at Asotin has been added to the report.
- 2. The report has been revised to include a discussion of future regional power needs.



OFFICE OF BOARD OF COUNTY COMMISSIONERS NEZ PERCE COUNTY

LEWISTON, IDAHO 83501

JAMES E. LUOMD, CLERK

COMMISSIONERS

ROBERT L. HUDDLESTON, First Distert CHAIRMAN 1723 Prospect, Lewiston, Josho 83501 VERAIN WHITE Second District 1034 Burret Ave., Lewiston, Joaho 83501 STEVE B. MCCOY To be Desired Lewiston, Idana 83501

January 23, 1980

Mr. Stan Young Bureau of Outdoor Recreation 915 Second Avenue, Rm. 990 Seattle, Washington 98174

Dear Stan:

In regards to control of the Snake River, the Nez Perce County Commissioners have unanimously decided that state control would be our preference, if the Idaho legislature passes the necessary legislation to implement such a program of control.

If the above-mentioned legislation is not forthcoming, we then would recommend and opt for federal control. Along with federal control we would strongly recommend that a local steering committee be established to help in the decisionmaking process in regards to the Snake River.

Local control is last on our list of options.

Sincerely,

BOARD OF COUNTY COMMISSIONERS

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Robert L, Huddleston, Chairman

1. M. File

Vera N. White

Steve B. McCoy

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OFFICE OF THE GOVERNOR STATE CAPITOL SALEM. OREGON 97330

August 22, 1979

Mr. Russell E. Dickenson Regional Director Pacific Northwest Region 601 Fourth and Pike Building Seattle, WA 98101

Dear Mr. Dickenson:

I have reviewed the drafts of the Snake and John Day Rivers Wild and Scenic River reports. The National Park Service is to be commended for the fine job it has done in compiling these reports and assessing each proposal's environmental impact.

Our principal interest concerns the John Day River report. It is well-documented that this fine Eastern Oregon river possesses the natural, scenic and recreational attributes worthy of federal designation. However, the present system of river management via the ten-year old Oregon State Scenic Waterways Act has been successful in managing the river and the related adjacent lands without significant loss of its natural or recreational values. The current management policies of the Bureau of Land Management river corridor lands has been in most cases consistent with state and local interests.

The counties of Gilliam, Wasco, Sherman, Jefferson and Wheeler have completed or will complete in the near future, land use planning and zoning designations for the river corridor area. Most of the river corridor will be designated and zoned for grazing and exclusive farm use, thereby precluding any immediate threat to the river from extensive non-compatible commercial, residential, or industrial uses.

I concur with the National Park Service recommended alternative. However, I do not anticipate submitting a John Day Wild and Scenic River designation request to the Secretary of the Interior until such time as local public opinion is more supportive of inclusion and/or a serious threat to the river's free-flowing or other values occur. Russell E. Dickenson

I also concur with the National Park Service recommended alternative for the Snake River Wild and Scenic River. As only four miles of the study area are within Oregon, and the area is already included in the Hells Canyon National Recreation Area, it makes good sense for management and administration of this area to remain with the U.S. Forest Service.

With this letter I am enclosing various state agency responses to the National Park Service studies of the Snake and John Day.

Sinceret Victor Ative

Governor

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enclosures



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Intergovernmental Relations Division 306 State Library Building, Salem, Oregon, 97310 Phone Number: 378-3732

NAKE RIVER REVIEW Return Date: AUG 0 3 1979

Froject #:

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

-) This project has no significant environmental impact.
- () The environmental impact is adequately described.
- We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.
- () No comment.

Remarks

The Oregon Department of Fish and Wildlife supports Alternative 1 (recommended plan) presented by the National Park Service in the draft environmental report. The recommended plan would protect this section of river from future dam construction, which could have significant impacts on aquatic and terrestrial wildlife. This plan would also provide protection to the fish and wildlife resources by restricting the overall use of the area and the kinds of allowable uses.

bc: Witty Coggins John Lilly, Department of Tranportation, Salem

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National Park Service 601 Fourth & Pike Bldg Seattle, WA. 98101

SNAKE WILD AND SCENIC RIVER STUDY -- PNRS 7906 4 1010

Thank you for submitting your draft Environmental Impact Statement for State of Oregon review and comment.

Your draft was referred to the appropriate state agencies. The Department of Fish and Wildlife and Geology offered the enclosed comments which should be addressed in preparation of your final Environmental Impact Statement.

We will expect to receive copies of the final statements as required by Council of Environmental Quality Guidelines.

KAY WILCOX, A-95 COORDINATOR

KW:cb

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OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Intergovernmental Relations Division 306 State Library Building, Salem, Oregon, 97310 Phone Number: 378-3732

PNRS STATE REVIEW

Project #:

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Return Date:

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

- () This project has no significant environmental impact.
- (χ) The environmental impact is adequately described.
- We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.
- () No comment.

Remarks

The Oregon Department of Fish and Wildlife supports Alternative 1 (recommended plan) presented by the National Park Service in the draft environmental report. The recommended plan would protect this section of river from future dam construction, which could have significant impacts on aquatic and terrestrial wildlife. This plan would also provide protection to the fish and wildlife resources by restricting the overall use of the area and the kinds of allowable uses.

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ENVIRONMENTAL MANAGEMENT SECTION 8/7/79



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM RECEIVED PTLD

STATE CLEARINGHOUSE

Intergovernmental Relations Division 306 State Library Building, Salem, Oregon, 97310 Phone Number: 378-3732

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ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

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-) The environmental impact is adequately described. (

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- We suggest that the following points be considered in the $(\mathbf{\times})$ preparation of a Final Environmental Impact Statement.
- 1) No comment.

Remarks

The Snake Wild and Scenic River Study contains contradictory information regarding geology, minerals, and future mining activities in the study area. The report lacks the basic data used to reach these various conclusions and it is difficult to judge the accuracy of various statements pertaining to geology and minerals.

The key contradictory point involves the future for mining under the proposed action. The final statement should clearly specify whether mining will be allowed in the study area.

BY D. Agency Declery

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Comments of the State of Oregon, Intergovernmental Relations Division dated August 10, 1979

1. The report has been revised to better clarify the discussion on mining.



Project #:

OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Intergovernmental Relations Division 306 State Library Building, Salem, Oregon, 97310 Phone Number: 378-3732

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Return Date: AUG 0 3 1979

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

This project has no significant environmental impact.

No The covircommental impact is adequately described.

We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.

) No comment.

Snaker River Els-Droft

Remarks

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By



State Marine Board OFFICE OF THE DIRECTOR 3000 MARKET ST. N.E., No. 505, SALEM, OREGON 97310 PHONE 378-8587

August 1, 1979

Mr. John E. Lilly, Manager Scenic Waterways Program Oregon State Parks 525 Trade St., S. E. Salem, OR 97310

Dear John:

As requested, I am providing the Marine Board comments on the draft Snake Wild and Scenic Rivers Study for incorporation into the coordinated state agency response being prepared by your office. This agency's comments are as follows:

- o The Marine Board members have not had the opportunity to review the draft EIS; therefore, these comments have been prepared by agency staff. The proposed alternative is only of concern to us insofar as 4 miles of the Snake River on the Oregon-Idaho border are recommended for inclusion in the federal Wild and Scenic River System. This area is a part of the Hells Canyon N.R.A., under the administration of the U.S. Forest Service.
- o Given the fact that the river meets the criteria for Wild and Scenic River status and is within the N.R.A., it seems desirable to include the segment within the federal river system. This will consolidate management and administration of all the Hells Canyon portion of the Snake. As such, we support the recommended alternative.
- o On page 19, the section on <u>Safety</u> might reflect that the U. S. Coast Guard has responsibility for boating safety on the river <u>in conjunction with</u> the States of Oregon and Idaho. The final EIS should also recognize that the Snake River is navigable for Coast Guard purposes within the study area.
- o In the display of alternatives, Table 8, p. 87, under benefits, item 9, Alt. 1, <u>Navigation</u> has the following statement: "Recreational navigation would be enhanced by regulating boat use." In the absence of a specific proposal for regulation, we fail to understand how recreational navigation would be enhanced by regulation, per se. Regulation of whom? When? How much? There are costs to regulation as well as benefits. As it stands, the statement is inadequate and needs to be addressed in the final report. Page 88 indicates no cost under <u>Navigation</u> for alternative 1. Is it suggested that boating regulations will result in all benefits and no costs?

If I can provide any additional information or assistance, please contact me. I would appreciate a copy of the final coordinated state agency response.

MM:PD:el cc: Board Members Pat / odeo, Governor's Office Sincerely, Mul Muthum Mal McMinn 1

Mal McMinn State Marine Director 220 Comments of the Oregon State Marine Board dated August 1, 1979

1. The report has been revised as suggested.



Forestry Department OFFICE OF STATE FORESTER

2600 STATE STREET, SALEM, OREGON 97310 PHONE 378-2560

July 31, 1979

Russell Dickenson Regional Director Pacific Northwest Region, National Park Service 601 4th and Pike Bldg. Seattle. WA 98101

Dear Mr. Dickenson:

A combined field and staff review of both the Snake and John Day Wild and Scenic River Studies has been completed by the Department of Forestry. Based on the information currently in the draft environmental statements we have no specific comment on the proposals. The Department will continue to monitor these proposals as they progress. We appreciate the opportunity to review the studies.

Sincerely,

Schraed

J.E. Schroeder State Forester

JES:DAD:mo cc: John E. Lilly State Legislators Federal Agencies State Agencies Executive Staff John Boro Ernest Labart Other Organizations and Individuals

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PACIFIC NORTHWEST GENERATING COMPANY .

10570 S.E. WASHINGTON, SUITE 204

PORTLAND, OREGON 97216

(503) 255-7248

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August 8, 1979

Mr. Russell E. Dickenson Pacific Northwest Region National Parks Service 601 Fourth & Pike Building Seattle, Washington 98101

Dear Mr. Dickenson:

The attached document contains comments of the Pacific Northwest Generating Company relative to the Snake Wild and Scenic River Study Draft Report/Environmental Statement dated April 1979. We hope that each of the areas in question is adequately explained and stand ready to discuss our comments at any time.

Sincerely,

;

David E. Piper General Manager

DEP/bl Enclosure

COMMENTS

OF

PACIFIC NORTHWEST GENERATING COMPANY

10570 S.E. Washington Portland, Oregon 97216

Relating To:

SNAKE WILD AND SCENIC RIVER STUDY DRAFT REPORT/ENVIRONMENTAL STATEMENT

Prepared by

NATIONAL PARK SERVICE

August 1, 1979

Introduction

This paper contains the comments of the Pacific Northwest Generating Company (PNGC) on the Snake Wild and Scenic River Study Draft Report/Environmental Statement (Draft) prepared by the National Park Service.

PNGC is a Rural Electrification Administration (REA) financed, electrical generation and transmission cooperative which was formed to assure that firm electrical power will be available to rural cooperatives in the Bonneville Power Administration service area. PNGC has seventeen members in the states of Oregon, Idaho, Washington and Wyoming, serving approximately 110,000 consumers. The potential membership is over 40. A list of members is attached as Exhibit A.

PNGC has filed an application with the Federal Energy Regulatory Commission for a preliminary permit for the Asotin hydroelectric project which is located within the study area.

This paper points out the legal deficiencies of the Draft, discusses the need for electric power both for the PNGC cooperatives and the region as a whole, suggests cost/benefit calculations from dam construction, describes the proposed dam, comments on specific deficiencies in the Draft, and expresses PNGC's support for Alternative Nine in the Draft.

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Legal Deficiencies

The Draft does not consider the present energy crisis when considering alternatives to its recommended proposal. The Draft displays a bias toward this proposal, while failing to discuss in detail the economic and energy benefits from possible construction of a hydroelectric dam near Asotin, Washington.

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It is incorrectly assumed that the 1975 deauthorization of a federal dam at Asotin precludes construction of a dam by a non-federal entity such as PNGC. These omissions and mistaken assumptions cause several legal deficiencies in the Draft.

The Draft purports to be a draft environmental statement. However, 43 C.F.R. Section 1502.14(b) requires an environmental impact statement to " (d)evote substantial treatment to each alternative considered in detail, including the proposed action so that review may evaluate their comparative merits." The Draft does not devote substantial treatment to Alternatives 9, 2 and 3, each of which would permit dam construction. The Draft does not discuss in detail the power needs of the local area and the Northwest region which could be met by construction of a hydroelectric dam; the Draft does not begin to address the economic and sociological benefits to the local area and to the Northwest region resulting from such a dam; the Draft does not discuss the harm caused to the human environment in this energy crisis from failure to construct a dam if the study area is declared Scenic and Recreational.

The Draft does not comply with the Wild and Scenic Rivers Act because it does not adequately address the potential use of the water which would be foreclosed if the river portion were included in the system; nor does the study adequately address the real costs of a Scenic declaration -precisely because it does not adequately treat the benefits from dam

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construction, nor the harm from foreclosing such construction.

The Draft does not comply with the Principles and Standards for Planning Water and Related Land Resources for two reasons: (1) by inadequately discussing the hydroelectric dam, the Draft does not select the plan which makes the best use of the resource while meeting the needs of society in a manner acceptable to the public; (2) it does not adequately treat the foregone economic benefits to provide a proper basis for evaluating tradeoffs.

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These failures make the Draft susceptible to an appropriate legal challenge.

Need For Power Considerations

As indicated in Tables 1 and 2, attached as Appendix B and C, both PNGC and the Northwest Region are projecting deficits of power supply for the forseeable future. The Draft indicates that the previously proposed hydroelectric dam near Asotin would supply 230 average megawatts of energy. PNGC members project up to 151.3 average megawatts of energy deficits for its members between 1983 and 1991 with the deficit growing in each year after 1991. The regional deficit ranges from 1016 average megawatts of energy in 1987-88 to 10,342 average megawatts of energy in 1998-99. These projected deficits are,after all, presently planned new generation projects and have been included as resources.

PNGC has three alternatives for meeting its members' energy needs. They could be satisfied by a coal-fired plant, a nuclear plant, or the Asotin hydroelectric project. (National policy prevents the construction of oil-fired generation.) Of the three, Asotin is the most viable economically, technically and environmentally.

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The hydroelectric project is consistent with our national policy of reducing our dependence on foreign oil. With a pool elevation of 842.5 feet, the project's electrical generation represents 3.5 million barrels of oil a year or 70.9 million barrels over a 50-year span. At \$20 a barrel for oil, with no price escalation, this oil savings is \$70 million a year, which has a present worth of \$703 million (assuming a 10 percent discount rate, and a 50-year life). The benefits from power production and oil displacement justify the project from an economic standpoint.

A comparison of costs for available alternative sources of power shows the value of power to PNGC. PNGC's other major generating resource is the Boardman coal-fired plant near Boardman, Oregon, and its costs in 1980 are projected to be 43 mills per kilowatt hour. The 43 mills per kilowatt hour correponds to an annual value of power generated from Asotin of \$87 million. Since the project is expected to cost \$300 million, the benefit/ cost ratio for the project equals 2.9. This ratio is expected to stay relatively constant over time since the value of power hence the benefits will increase at approximately the same rate as the escalated cost for the project.

Specific Comments on the Draft

PNGC questions the basis for assigning a value of \$500 per acre for fee acquisition and \$200 per acre for scenic easement. Our information indicates higher values.

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The discussion of the former proposed Asotin Dam on page 16 is inadequate. The Corps of Engineers indicate that the discussion contains some inconsistencies. The first half of the discussion describes the Asotin project as if the reservoir pool level was at 842.5 feet. The rest of the discussion is based on a project which would have a reservoir pool elevation of 880.0 feet.

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The annual power benefits were calculated based on an alternative of oil-fired combustion turbines. The annual costs for a similarly sized combustion turbine installation were developed and those costs were compared with the costs of the Asotin project. The use of combustion turbines to develop power benefits associated with base load generation is unrealistic since combustion turbines cannot be economically utilized for base load.

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Because of the age of the original Asotin project cost estimate, the use of indices to update it, and the use of combustion turbine plant costs for comparison, the development of the costs and power benefits needs to be redone with better documentation and all assumptions noted.

On page 53, the proposed dam is mentioned with the subjective comment, "Its reauthorization is unlikely due to continuing strong opposition." The comment provides no objective supporting data and omits consideration of construction by a non-federal entity.

On page 55, the discussion of the impact on the local economy is superficial, containing neither specifics, nor quantification. The discussion of the impact on local government fails to consider the lost tax benefits that could be provided by a dam built by a non-federal entity. Also, the additional recreational values provided by a dam are never really considered.

On page 59, the discussion of impacts on fish and wildlife contain subjective comments regarding dams which are not quantified. A dam reservoir may have positive effects. At the same time, the mitigating measures included in the proposed action suggest no mitigating measures for the adverse economic effects; the loss of a relatively inexpensive power source during an oil-dependent energy crisis; or the loss of recreational area resulting from preventing dam construction.

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- 5 -

On page 65, the Draft inadequately treats the adverse effect of foreclosing dam construction both on local economic growth and on the production of electricity. It does not discuss the adverse effect on the entire Northwest. On page 66, the Draft incorrectly labels the hydroelectric dam as a short term use.

The Draft does hint at what it has completely ignored when it mentions on page 71 that "increasing energy needs could make construction of a dam or dams more attractive." The impact of this statement is not considered by the authors and the "attractiveness" is not quantified.

Proposed Asotin Project

PNGC has applied to the Federal Energy Regulatory Commission for a preliminary permit which includes a project area extending from river mile 143.0 to river mile 176.0. One possible site for the dam and power house is near the town of Asotin, Washington. Various dam heights are being considered with the tallest dam backing water up to the point of intersection of the Oregon-Washington-Idaho borders.

The dam project would have a gated overflow spillway section with concrete gravity sections connecting the spillway to the power house on the right side of the river and to a rockfill embankment on the left side. There is ample space in this concrete gravity section for the installation of a future navigation lock, should it be necessary. The spillway would be controlled by six tainter gates having the required spillway discharge capacity. The normal pool level would be set at around 842 feet.

Preliminary analysis has indicated a power installation of four 96,000 kilowatt units totaling 384,000 kilowatts. The estimated average annual output would be 230,000 average kilowatts (approximately 2 million megawatt hours).

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Based on 1979 dollars, the project is estimated to cost \$300 million with annual costs of about \$30 million per year.

Conclusion

The Draft discusses the proposal's interrelationship with other Projects and Programs. It does not discuss the proposal's inconsistency with President Carter's federal energy policy of reducing the nation's dependence upon imported petroleum.

A recent study by the General Accounting Office entitled "Questions on the Future of Nuclear Power; Implications and Tradeoffs" discusses electrical energy. In light of the Three Mile Island accident, actions may be taken to limit the growth of nuclear power. The GAO report indicates that if this is the case, such actions must be accompanied by programs to severely limit electricity consumption while other programs would need to be instituted to expand the supply of other electrical resources. The report warns that if these basic relationships are ignored"serious shortfalls of electricity supply are likely to occur within the next five to ten years." In other words, the nation must continue to look for new generating resources from proven, effective technologies, especially if nuclear growth is curtailed. Hydroelectric generation is a proven, effective technology.

The benefits and detriments from the recommended proposal have not been properly weighed, particularly the detriments of foreclosing dam construction. When the benefits of dam construction are considered, they should indicate that Alternative 9 will be the recommended proposal.

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PACIFIC NORTHWEST GENERATING COMPANY

MEMBER SYSTEMS

Benton Rural Electric Association Prosser, Washington

Big Bend Electric Cooperative, Inc. Ritzville, Washington

Blachly-Lane County Cooperative Electric Association Eugene, Oregon

Central Electric Cooperative, Inc. Redmond, Oregon

Clearwater Power Company Lewiston, Idaho

Columbia Rural Electric Association Inc. Dayton, Washington

Consumers Power, Inc. Corvallis, Oregon

Coos-Curry Electric Cooperative, Inc. Coquille, Oregon

Inland Power & Light Company Spokane, Washington

Kootenai Electric Cooperative, Inc. Coeur d'Alene, Idaho

Lane Electric Cooperative, Inc. Eugene, Oregon

Lincoln Electric Cooperative, Inc. Davenport, Washington

Lower Valley Power and Light, Inc. Afton, Wyoming

Midstate Electric Cooperative, Inc. LaPine, Oregon

Orcas Power and Light Company Eastsound, Washington

Raft River Rural Electric Cooperative, Inc. Malta, Idaho

Umatilla Electric Cooperative Association Hermiston, Oregon

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Exhibit A

Table 1

	Pt Load I	NGC Forecast	PNGC / Reso	Members' urces	Requi	irements PNGC
Operating Year	Peak (MW)	Energy (MW_avg)	Peak (MW)	Energy (MW avg)	Peak (MW)	Energy (MW avg)
1983-84	1,485.2	770.5	1,275.6	646.6	209.6	123.9
1984-85	1,577.9	822.7	1,326.2	66 0. 6	251.8	151.3
1985-86	1,670.7	874.8	1,374.8	668.7	97.6	53.9
1986-87	1,763.4	926.9	1,391.8	672.2	34.6	20.9
1987-88	1,856.1	97 9.0	1,442.0	675.7	4 0.2	24.1
1988-89	1,948.9	1,031.2	1,495.9	679.1	42.6	25.5
1989-90	2,041.6	1,083.3	1,497.7	681.3	154.3	86.7
1 990~ 91	2,134.3	1,135.4	1,509.4	683.4	245.6	141.7

Exhibit B

Table 2

Regional Power Supply Deficits 1979-80 West Group Forecast

	Deficit		
Operating Year	Peak (MW)	Energy (MW avg)	
1979-80	254	1,599	
1980-81	1,359	2,214	
1 981-82	846	1,998	
1982-83	2,514	2,499	
1983-84	345	2,835	
1984-85	1,484	2,611	
1985-86	712	2,018	
1986-87	(432)	1,162	
1987-88	(544)	1,016	
1988-89	(195)	1,034	
1989-90	282	1,020	
1990-9 1	2,155	1,751	
1991-92	3,986	2,713	
1 992 - 93	5,974	3,725	
1993-94	8,006	4,768	
1994-95	10,100	5,856	
1995-96	12,312	6,974	
1996-97	14,485	8,039	
1 997 - 98	16,687	9,189	
1998-9 9	19,044	10,342	

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Exhibit C

Comments of Pacific Northwest Generating Company dated August 8, 1979

- 1. The report has been revised to include discussion of the Pacific Northwest Generating Company's application of April 1979 for a preliminary permit to construct an Asotin Dam and information about the benefits and costs of such a dam.
- 2. The report has been revised to include information about expected regional power needs.
- 3. The report has been revised to include current land cost information.
- 4. The discussion in the report on fish and wildlife impacts has been revised based on correspondence received from the Idaho Department of Fish and Game and the Columbia River Fisheries Council. The correspondence is included in Appendix 2.

PORT OF CLARKSTON

ASOTIN COUNTY PORT DISTRICT • 435 5th St., Clarkston, Washington 99403

3 August 1979

R. E. Dickenson Regional Director National Park Service 601 Fourth and Pike Building Seattle, Washington

Reference is: L 5815 (PNR) PCR Snake River

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Dear Sir;

Your draft environmental statement "Snake: Wild and scenic river study" is unacceptable. The draft report contains errors in economic information presented. Erroneous conclusions are then drawn from this faulted information. The major study deficiencies are:

A: You understate the annual national benefits from hydropower. You state that the annual benefits lost due to not developing hydro-power are \$55,000,000.00 annually. Considering a hydro scenario that provides a minimum adequate storage; and considering the current OPEC oil price structure; hydro megawatts foregone in your study are equal to a minimum of \$300,000,000.00 annually and up to about \$700,000,000. annually if the total hydro capability of the middle Snake area is developed.

B: You state that your proposal would extend maximum protection to fish and wildlife habitat---. A different federal study indicates that over 3,000,000 acre feet of water storage in the Snake drainage is needed to assure the continuance of salmonid fisheries, specifically; to move migrating smolts downstream in low run off years.

Fish bioligists believe that two or more consecutive low flow years like 1976-1977 may doom the anadromous wild runs in the Snake drainage and severely deplete hatchery runs. Under current law, reduction or deferral of irrigation flows in south Idaho to benefit anadromous fisheries is not considered likely.

C: Your statements pertaining to the limestone deposits in the study area are partially correct assuming that the entire area is turned into a playground. Studies exist showing the grave economic loss if the deposit is not developed.

Summary: Using information that was available to you during the study preparation the annual national cost if your study prevails is probably more than \$457,000,000.00.

Recommend that you withdraw your draft study and reanalyse the national costs involved in denying the megawatt potential of the canyons hydro-power; the effects on anadromous fisheries if storage is not constructed; and the grave economic loss by not permitting mineral development.

Attached as an enclosure is an elaboration of the preceding points.

Very Truly Yours,

Zirbel, Dốn Ži Secretary

Distribution: Appropriate Federal State and Private Agencies
COMMENTS ON SNAKE WILD AND SCENIC RIVER STUDY DRAFT REPORT/ENVIRONMENTAL STATEMENT PUBLISHED BY THE DEPARTMENT OF INTERIOR NATIONAL PARKS SERVICE APRIL 1979

THE ENVIRONMENTAL STATEMENT ASSUMES THAT THE SNAKE RIVER FROM THE VICINITY OF ASOTIN, WASHINGTON UPSTREAM TO HELLS CANYON DAM WILL BE A RECREATION AREA, AND THAT HYDRO POWER, MINERAL DEVELOPMENT, AND WATER STORAGE, WILL NOT BE PERMITTED IN THIS REACH OF THE RIVER. CONSIDERING OUR NATIONS ENERGY PROBLEMS AND THE PRESIDENTS RECENT STATEMENTS CONCERNING THE NECESSITY FOR THE UNITED STATES TO BECOME ENERGY SELF SUFFICIENT, THE STUDY ASSUMPTION MAY BE ERRONEOUS. THAT, CONSIDERED WITH OTHER FEDERAL STUDIES THAT EXPLAIN THE NECESSITY FOR ABOUT 3 MILLION ACRE FEET OF STORAGE IN THE SNAKE DRAINAGE FOR ANADROMOUS FISHERIES, RAISES SERIOUS DOUBTS AS TO THE VALIDITY OF CREATING A PLAYGROUND IN THIS STRETCH OF THE SNAKE RIVER. IN FURTHERANCE OF OUR COMMENTS THE FOLLOWING INFORMATION IS SUB-MITTED:

A; POWER;

A REVIEW OF THE U.S. BUREAU OF RECLAMATION RESOURCE STUDY OF THE MIDDLE SNAKE AND HOUSE DOCUMENT 403 REVEALS THE HYDRO-POWER POTENTIAL IN THE AREA COVERED BY THE STUDY. UNDER ONE SCENARIO THAT INCLUDES THE DEVELOPMENT OF THE MIDDLE SNAKE AS WELL AS THE SALMON RIVER; HYDRO POWER EQUIVALENT TO 29,760,500 BARRELS OF OIL ANNUALLY ARE LOST IF HYDRO POWER IS NOT DEVELOPED. UNDER A SECOND SCENARIO POWER EQUIVALENT TO 32,146,50C BARRELS OF OIL ANNUALLY ARE LOST IF NO HYDRO POWER IS DEVELOPED.

IN LOOKING AT POTENTIAL STORAGE SITES A NUMBER OF ASSUMPTIONS ARE MADE:

ASSUMPTION A: THAT DAMS SHOULD NOT BE CONSTRUCTED ON THE SALMON RIVER, GRANDE RONDE RIVER, OR THE IMNAHA RIVER.

ASSUMPTION B: THE SITING OF ANY STRUCTURES IN THE SNAKE RIVER SHOULD BE SO LOCATED AS TO MINIMIZE DAMAGE TO EXISTING MAJOR SPAWNING TRIBUTARIES OF THE SNAKE RIVER.

ASSUMPTION C: A MINIMUM OF 3+MILLION ACRE FEET OF STORAGE SHOULD BE CONSTRUCTED.

ASSUMPTION D: ANADROMOUS SPAWNING IN THE MIDDLE SNAKE WILL BE LOST.

IN ORDER TO MEET THE STOPAGE NEEDED A SERIES OF 3 DAMS ARE PROPOSED IN THE STUDY AREA, THESE DAMS ARE:

SUB A: HIGH MOUNTAIN SHEEP DAM

SUB B: A RE-REGULATOR AT CHINA GARDENS.

SUB C: A STORAGE AND RE-REGULATOR AT ASOTIN.

THESE 3 STRUCTURES GENERATE POWER EQUIVALENT TO AN ANNUAL IMPORT OF MORE THAN 15 MILLION BARRELS OF OPEC OIL. THE DAMS ON THE SALMON WERE NOT CONSIDERED AS THEY CONVERT A MAJOR ANADROMOUS SPAWING STREAM TO NON SPAWING POOLS.

THUS, TO PROVIDE THE MINIMUM STORAGE NEEDED AND THE MAXIMUM HYDRO PRODUCTION THEREFROM THE FOREGOING THREE DAMS ARE CONSIDERED THE MINIMUM NECESSARY, FOR OPTIMUM SMOLT FLUSHING FLOWS AND POWER DEVELOPMENT.

SOURCE DOCUMENTS (ALL FEDERAL PUBLICATIONS)

A: USBR: RESOURCE STUDY OF THE MIDDLE SNAKE

B: HOUSE DOCUMENT 403 239

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6: PACIFIC NORTHWEST RIVER BASINS COMMISSION 3 VOLUMES "WATER - TODAY AND TOMORROW".

B: FISH:

A SERIES OF STUDIES MADE BY THE PACIFIC NORTHWEST RIVER BASIN COMMISSION OUTLINES IN DETAIL THE CRITICAL NATURE OF ANADROMOUS FISHERIES IN THE PACIFIC NORTHWEST. IT IS STATED THAT ABOUT THREE MILLION ACRE FEET OF WATER STORAGE IS REQUIRED IN THE SNAKE DRAINAGE FOR THE ASSURANCE OF THE CONTINUATION OF THE ANADROMOUS FISHERIES IN IDAHO, EASTERN OREGON, AND EASTERN WASHINGTON.

THE SOURCE COMPUTATION OF 3+ MILLION ACRE FEET OF WATER STORAGE IS NOT CLEARLY ESTABLISHED. FISH BIOLOGISTS STATE THAT THIS STORAGE IS A REQUIREMENT AND THEY ARE SEARCHING THE SNAKE DRAINAGE FOR SPECIFIC SITES.

PUBLIC LAW 94-199 SEEMS TO PROVIDE A SIGNIFICANT BARRIER TO THE CREATION OF STORAGE IN THE SNAKE DRAINAGE SOUTH OF, OR UP STREAM OF, HELLS CANYON DAM. THE CURRENT AND PROPOSED RECLAMATION EFFORTS TO CONVERT ARID SOUTH IDAHO LANDS TO ARABLE ACRES APPEARS TO FORECLOSE THE OPTION OF PROVIDING STORAGE IN THAT PORTION OF THE SNAKE DRAINAGE FOR ANADROMOUS FISH.

ASSUMING THE LOGIC OF THAT POSTURE THEN THE REMAINING AREA IN THE SNAKE DRAINAGE THAT CAN STORE THE SIGNIFANT AMOUNT OF WATER REQUIRED, IS THAT STRETCH OF THE SNAKE RIVER FROM HELLS CANYON DAM DOWN STREAM TO THE ASOTIN DAM SITE.

THE STORAGE RECOMMENDED ARE:

- A: ASOTIN DAM 225,000 ACRE FEET.
- B: CHINA GARDENS DAM 76,000 ACRE FEET.
- C: HIGH MOUNTAIN SHEEP DAM 3,600,000 ACRE FEET

TOTAL ACRE FEET 3,901,000 ACRE FEET.

THE THREE STRUCTURES PROVIDE STORAGE IN EXCESS OF 3.9 MILLION ACRE FEET. THIS STORAGE HAS FOUR MAJOR EFFECTS.

- SUB A: POWER GENERATION.
- SUB B: STORAGE FOR SMOLT TRANSPORTATION.

SUB C: TEMPERATURE REDUCTION IN THE SNAKE RIVER.

SUB D: LOSS OF SPAWNING HABITAT IN THE MIDDLE SNAKE RIVER.

THE PACIFIC NORTHWEST RIVER BASINS COMMISSION STUDY LISTS THE HIGH TEMPERATURE OF THE SNAKE RIVER AS A SIGNIFANT POLLUTION FACTOR INHIBITING THE TIMELY MOVEMENT OF THE ANADROMOUS FISH RETURNING TO SPAWN.

FISH BIOLOGISTS STATE THAT THE DAMS ON THE SNAKE RIVER HAVE SERIOUSLY AFFECTED THE SMOLT MOVEMENT TO SALT WATER. THE NATIONAL MARINE FISHERIES HAS BEEN WORKING FOR SOME TIME TO STUDY AND DETERMINE AN EFFECTIVE WAY TO MOVE SMOLTS FROM THE DAM AREAS DOWNSTREAM. DURING THE PERIOD 1976-1977 OPERATION FISH RUN MOVED 2.8 MILLION SMOLTS VIA-BARGE AND OTHER MEANS TO A RELEASE POINT BELOW BONNEVILLE DAM. THE PERIOD 1979-1980 WILL PROVIDE INFORMATION ON THE EFFECTIVENESS OF THIS OPERATION. THE PORT OF CLARKSTON HAS BEEN PLEASED TO ASSIST THE NATIONAL MARINES FISHERIES IN THEIR EFFORT TO MOVE AND COLLECT SMOLTS FROM THE SNAKE RIVER. WE HAVE IN THE PAST AND, WILL IN THE FUTURE, PROVIDE FACILITIES NEEDED BY THE FISH BIOLOGISTS TO ENHANCE THE FISH RUNS IN THE SNAKE DRAINAGE. SOME FISH BIOLOGISTS STATE THAT THE CREATION OF ANOTHER DAM ON THE SNAKE RIVER WILL PROBABLY DOOM ANADROMOUS FISHERIES UPSTREAM FROM THE DAM. A SIMILAR STATEMENT WAS MADE BY AN OREGON FISHERIES EXPERT IN 1968 AT THE DEDICATION OF THE JOHN DAY DAM. HE STATED EMPHATICALLY THAT THE JOHN DAY DAM WOULD END ALL ANADROMOUS

FISHERIES UP THE COLUMBIA AND SNAKE RIVERS. THAT DID NOT HAPPEN. OTHER BIOLOGISTS STATE THAT IF SUFFICIENT MANPOWER, MONEY, AND MATERIAL IS PROVIDED, THEY BELIEVE THAT A SYSTEM CAN BE DEVISED TO EFFECIENTLY MOVE SHOLTS AROUND THE BARRIERS CREATED BY MAN IN HIS SEARCH FOR FOWER. IL ADDITION THE COMPS OF ENGINEERS IS SPENDING APPROXIMATELY 50 MILLION DOLLARS IN MITIGATION FOR FISH AND WILDLIFE HABITAT LOSS AS A RESULT OF THE SNAKE RIVER DAM CONSTRUCTION. FISH BIOLOGISTS STATE THAT EVEN THOUGH TYRE MITIGATION EFFORT WILL RESULT IN ADDITIONAL HATCHERY PROPAGATION TRAT: DITIOUT SUFFICIENT STORAGE TO ASSURE THE MOVEMENT OF THESE FISH JUNING A FROLONGED DROUGHT PERIOD THE EFFORT WILL FAIL. THEIR HAIN CONCERN ME THE WILD STOCKS THAT NATURALLY SPACE IN THE SNAKE RIVER AND MID TOIDUTED THESE. THESE STOCKS ARE SEVERLY EFFECTED WHEN LOW FLOWS COCUR AND THE CHOLT POLULATION CAN NOT HATURALLY TRAVEL DOWNSTRIAN TO EALT WATER. A SIGNIFICANT BODY OF OFINION FEELS INAT LOSS OF IMESE WILD STOCKS VIS-A-VIS THE HAVCHERY FIGH WOULD BE A FATAL LOSS TO THE SALMONID FISH FOPULATION IN THI CHARD BRATMACE. CTORACE THEREFORE SEEMS TO BE AN OPERATIONAL RECESSITY FOR CONTINUMATION OF FISH RUNS AND ALSO SEEMS TO BE OF MATIONAL INFORTANCE MAIN CONSIDERED WITH THE NATIONAL ENERGY SHORTAGE.

IT SHOULD BE CLEARLY POINTED OUT THAT ANY ENABLING LEGISLATION SHOULD PROVIDE THE NATIONAL MARINE FISHERIES, U.S. FEDERAL FISH AND WILD LIFE, AND STATE AGENCIES WITH THE MAN POWER, MONEY, AND OTHER RESOURCES NEED TO FULLY EVALUATE AND DEVELOPE A MEANS TO TRANSPORT FISH AROUND THE INTERVENING EARNIERS.

HAVING OESERVED VARIOUS FISHERIES EXPERTS AT WORK I BELIEVE THAT, GIVEN THE RESOURCE TO DO THE JOB, THAT THEY WILL DEVISE A SAFE, EFFICIENT MEANS OF MOVING SMOLTE DOWNSTREAM AND SPAWNERS UPSTREAM. WE, AS A NATION, SHOULD NOT FOREGO MYDRO MEGAWATT GENERATION TO CREATE A PLAYGROUND. ALTERNATIVELY, IF THE FOLITICAL SPECTRUM DIRECTS HYDRO DEVELOPMENT, THE ENABLING STATUTES SHOULD PROVIDE FOR THE ANADROMOUS FISH PROTECTION AND AMFLE RESEARCH, MANPOWER, AND MONEY TO SOLVE THE PROBLEMS CREATED BY THE DAMS.

SOURCE DOCUMENTS: SEE A ABOVE.

C: MINERALS: THE STUDY GLOSSES OVER THE MINERAL DEPOSITS -SPECIFICALLY LINESTONE - IN THE SNAKE RIVER - STATING IT.IS NOT ECONOMICALLY COMPETIVE WITH OTHER DEPOSITS: THIS STATEMENT IS PARTIALLY INCORRECT. AT THE TIME THAT THE ASOTIN DAMS FUTURE BECAME QUESTIONED CEMENT COMPANIES PURCHASED A LIME DEPOSITS IN THE TEXADA ISLAND IN CANADA. I AM NOT AWARE OF THE FOREIGN EXCHANGE RATE INVOLVED IN MINING A CANADIAN LIMESTONE PRODUCT AND TRANSPORTING IT SEVERAL HUNDRED MILES THROUGH THE SEA TO POINTS IN OREGON OR WASHINGTON. I HAVE, HOWEVER, AVAILABLE STUDIES WHICH ARE LISTED HERE WHICH INDICATE THAT THE ASOTIN LIMESTONE IS INDEED HIGHLY COMPETETIVE AND CONSIDERING THE NATIONAL BALANCE OF PAYMENTS SHOULD BE RE-ANALAYSED IN THE STUDY. THE STUDY SHOULD COMPLETELY EXAMINE THE GRAVE ECONOMIC LOSS TO BE EXPERENCED BY THE COUNTY AND STATE TAXPAYERS INVOLVED, AS WELL AS THE ECONOMIC IMPACT ON THE PACIFIC NORTHWEST AND THE NATION IF NO DEVELOPMENT OCCURS.

SUMMARY:

ECONOMIC LOSS AS A RESULT OF NO DEVELOPMENT OF THE MIDDLE SNAKE IS ESTIMATED TO BE (IN 1979 DOLLARS):

- A: POWER LOST + \$300,000,000.00 ANNUALLY
 - B: MINERAL ECONOMIC LOSS (JOES & PRODUCT) \$150,000,000.00 ANNUALLY. 241

C: LOSS TO FISHERIES IF DRY YEARS OCCUR AND NO STORAGE IS AVAILABLE (AVERAGE \$150.00 PER FISH ADAPTED FROM TUTTLE 1975) (50,000 X 150) EST \$7,500.000.00

TOTAL \$457,500,000.00

SOURCE DOCUMENTS:

A: DEVELOPMENT PLAN FOR THE PORT OF WILMA NORTH CLARKSTON:

SECTION 111 4 MINERALS PORT OF WHITMAN COUNTY.

B: ECONOMIC GEOLOGY OF CARBONATE ROCKS ADJACENT TO THE SNAKE

RIVER SOUTH OF LEWISTON, IDAHO; C.N. SAVAGE, UNIVERSITY OF IDAHO C: FUMICITE DEPOSITS IN THE BILLY AND CAPTAIN JOHN CREEK AREAS; NEZ PERCE COUNTY, IDAHO: NEVIN

D: RECORD OF PUBLIC HEARING "ASOTIN DAN" MARCH 1965 CORPS OF ENGINEERS.

Comments of the Port of Clarkstor. dated August 3, 1979

 Realization of the total hydro capability of the Middle Snake is not a viable option. It was foreclosed in 1975 when Congress established the Hells Canyon NRA to include the 71 miles of river between Hells Canyon Dam and the Oregon-Washington state line, including 67 miles which were added to the National Wild and Scenic Rivers System.

According to the Corps of Engineers, construction of Asotin Dam at a pool elevation of 842.5 feet would result in the production of energy equivalent to 3.53 million barrels of oil annually.

- According to the Columbia River Fisheries Council (see Appendix 2), although stored water is needed to facilitate downstream migration of smolts, storage would have to be located far upstream from the study area.
- The report has been revised to include additional information about the potential benefits from limestone deposit development.
- 4. In establishing the Hells Canyon NRA, Public Law 94-199 serves to protect an area which extends north and downstream from Hells Canyon Dam, rather than south and upstream.



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August 10, 1979

Mr. Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth & Pike Building Seattle, WA 98101

Dear Mr. Dickenson:

These are the comments of the Public Power Council (PPC) on the Snake Wild and Scenic River Study Draft Report/Environmental Statement Prepared by the National Park Service.

PPC is a non-profit corporation representing the consumerowned utilities that are customers of the Bonneville Power Administration in all matters related to power supply. PPC has 115 members primarily in the states of Oregon, Idaho, Washington and Montana. PPC is funded by voluntary contributions from its members.

This paper points out deficiencies of the draft and discusses the need for electric power in the region as a whole. It also points out the inadequacies of the draft with respect to non-federal development of the Asotin Hydroelectric Project as envisioned in the application for preliminary permit filed by the Pacific Northwest Generating Company (PNGC).

Generally, PPC feels that alternative nine, upper four miles added to national system under forest service administration is the most supportable alternative in light of national and regional priorities at this time.

General Comments:

The draft discusses the proposed action alternative one as it compares to alternative number two, no action, in some detail. By comparison, only passing attention is given to the differences between alternative one and alternative three, full resource development.

Alternative three generally presumes federal construction of a dam at Asotin. The Federal Energy Regulatory Commission is currently considering an application for a preliminary permit for the Asotin Hydroelectric Project by the PNGC. Therefore, it would be appropriate for the draft to consider the possibility of such construction thoroughly and accurately. On page one of the draft it is noted that the Wild and Scenic Rivers Act requires the preparation of a report that addresses the reasonable foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed. Further, NEPA requires an environmental impact statement discussing alternatives to the proposed action and adverse affects which cannot be avoided should the proposal be implemented.

Generally, the draft does not discuss the foreseeable use of the land and water for the purposes of hydroelectric generation that would be foreclosed as a result of the proposed action in the detail that would be appropriate in considering a location for which an application for preliminary permit is pending. Further, the EIS needs to address the adverse affects which cannot be avoided if the Asotin Hydroelectric development is foreclosed. The opportunity for nonfederal development of the Asotin Hydroelectric Project should be discussed in sufficient detail to establish the beneficial economic activity, tax revenues from the construction, and valuable recreational potential of the larger body of water that would result. The draft should also address the mitigation measures required to offset the detriment to the region of inability to meet electric demand, detriment to the region, the nation and the environment of providing alternate energy from fossil fuel sources, detriment to the local economy of the loss of economic activity in tax base, and potential detriment to the local economy if the utilities serving the adjacent areas who are members of the PNGC are unable to meet demand for electricity within their service territories.

Specific Comments:

The draft does not identify what portion of the siginificant archeological sites would be inundated by development of the Asotin Hydroelectric Project. It also does not identify what mitigation could be done in that event.

In discussing recreational resources the draft identifies eight major federally administered recreation areas, seven of which are national recreation areas, primitative areas, wilderness areas, or other areas of similar recreational value. The draft also identifies seven rivers in the National Wild and Scenic River System and three additional rivers located near by. Having identified nearly 3.4 million acres of similar recreation area and potentially ten rivers in the National Wild and Scenic River System the draft fails to establish the public value of additional similar recreation facilities. 2

With respect to recreation it is not established how much of the jet boating and float boating occurs within the existing national recreation area and how much occurs below the existing national recreation area. Nor is it established what impact alternatives three or nine would have on the recreational uses.

On page 51 a table is given proporting to identify user days for specific recreational uses. The items, "Power boat use from Hells Canyon Dam to Wild Sheep Rapids-2,031 estimated user days," and "Jet boat use from Wild Sheep Rapids to Oregon-Washington border 13,000 estimated user days," are in apparent conflict with the first full paragraph on page 8 discussing the nature of the recreational use. It seems likely that jet boat use in fact occurs between Hells Canyon Dam and Wild Sheep Rapids, apparently entirely within the existing national recreation area.

In general, the discussions scattered throughout the draft of estimated recreational use are not totally consistent. Further, the source of numbers for the recreational use days on page 85 is not identified and appears inconsistent with discussions in the text. The numbers used appear to be based on a projection of uses of the river downstream of Hells Canyon Dam. Much of this use occurs upstream of the proposed study area and it cannot be readily identified how much of the recreation use is within the study area.

Under alternative nine on page 85 it is stated that recreation is similar to alternative six for upper four miles. Alternative six discussion states only similar to alternative two.

It is difficult to comprehend the rationale for the statement on page 71 that construction of the dam does not appear feasible in light of the pending application. The projected cost for the Asotin Dam of \$540 million dollars, even if escalated to 1980 construction cost and interest rates, would compare very favorably with alternative supplies of 242 Average Megawatts of energy. For example, 242 Average Megawatts represents approximately 30% of the energy capability of the Washington Public Power Supply System Project No. 30% of the construction budget for Project No. 4 is 4. approximately \$780 million dollars. Further, the Asotin Dam would have a nearly insignificant annual operating cost as compared to the nuclear project and would generate a much higher proportion of capacity. ŤΠ summary, the discussion of the Asotin Dam construction cost and annual benefits is totally inadequate.

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In table eight on page 84 under alternative three, it is unclear how it was established that white sturgeon would be eliminated. White sturgeon currently exists in the lower reaches of the Columbia River where there are impoundments.

With respect to an anadromous fisheries it is stated that the majority of natural anadromous fish population and its recreation values would be lost. The study does not describe how that conclusion was reached. Development of the Asotin Dam with its associated improvement in river transportation could be very effective in allowing the barging of downstream migrant salmonids thereby much improving the escapement of salmonids to the ocean.

Table eight on page 87 under element ten generally ignores the benefit of the privately developed hydro project with respect to county tax base and commercial development.

In conclusion, alternative nine which would include four of the remaining eleven miles of the truly scenic portion of the canyon would seem the most appropriate at this time. This alternative would provide that over 90% of the truly scenic canyon (71 of 78 miles) would be included in national recreation areas. The relative benefits of alternatives one and three have not at this point been adequately established to choose alternative one over alternative two. Therefore, at this time alternative nine seems to be the alternative that is directly related to the benefits than can be established.

Very truly yours,

Bruce E Miger

Bruce E. Mizer Project Coordinator

BEM:jje

4

Comments of Public Power Council dated August 10, 1979

- 1. The report has been revised to include additional information about the benefits and cost of an Asotin Dam and to recognize the Pacific Northwest Generating Company's application of April 1979 for a preliminary permit to construct the dam.
- 2. The archeological sites were inventoried by the University of Idaho in connection with the authorization of a Federal dam (Corps of Engineers) at the Asotin site. The details of the inventory as contained in a 1969 report were not released so as not to reveal the location of the sites to pot hunters.
- 3. Information about recreation use has been revised and updated.
- 4. The report has been revised to include additional information about the effects of Asotin Dam on the white sturgeon and anadromous fish runs.
- 5. The benefits of hydroelectric development on the county tax base and local economy is now discussed in the report.

Box 7391 GAFB, TX. 76903

DEAR MR. DICKENSON:

I HAVE READ THE DELS AND THE PROPOSED PLAN TO DESIGNATE A PORTION OF THE SNAKE RIVER AS A NATIONAL DWILD AND SCENK RIVER.

I STRONGLY SUPPORT THE PROPOSED PLAN IN WHICH THE U.S. FOREST SERVICE WOULD PROTECT THE UPPER 11 MILES OF THE RIVER AND THE AFFECTED STRIES THE LOWER 22 MILES.

THE ONLY SUGGESTION I HAVE IS TO INCREASE THE EMPHASIS ON THE CONCEPT THAT IF THE STATES DO NOT PROTECT THE LOWER PORTION THAT IT IS RECOMMENDED THAT CONGRESS MOVE FOR FEDERAL FOREST SERVICE PROTECTION.

YOU HAVE MY CONTINUED SUPPORT.

AUG 6 '79 HPS-PNRO hinit Date DDO i A 2 Ā DPA DEO Central Files Action Taken

suph c. Schott Joseph c. Schott

Northern Rockies Chapter

Snake River Plateau Group Middle Snake Group Montana Group Spokane Group Palouse Group

P.O. Box 8787, Moscow, Idaho 83843

3 July 1979

Regional Director, NPS 601 Fourth and Pike Bdg. Seattle, WA 98101

Dear Mr. Dickinson:

I have examined carefully the recent draft report on the Snake River below the Hells Canyon NRA and wish to make the following comments on behalf of the Sierra Club's Northern Rockies Chapter.

We strongly support the recommendations made in the draft publication. Some form of protection from unwise development for this stretch of the Snake is long over-due, and your proposal certainly moves in the right direction. It ought to preclude some foolish plans for limestone excavation above the mouth of the Grande Ronde, and would also inhibit new second home developments along the river.

We do, however, seriously doubt that the State of Idaho, through its legislature, will ever act to protect that segment of the river recommended in your plan for state control. The Idaho legislature is not presently in the hands of people who have even the slightest appreciation of the values of a wild, freeflowing stream. They can understand only how to make a quick buck, usually at the expense of some wild place. That portion of your draft is thus, at best, naive.

We therefore recommend a change: either set a clear and firm deadline for Idaho to act, or recommend that the river all the way to Asotin be placed under USFS administration. Only such a course of action will truly protect the river above the Lower Granite Dam pool.

Sincerely,

SIERRA CLUB

NORTHERN ROCKIES CHAPTER

 \sim M. Smath. P. Alak. Dennis W. Baird Chapter Secretary

Comments of the Sierra Club dated July 3, 1979

1. Imposing a "clear and firm" deadline on Idaho, as recommended, will not hasten any action Congress may take to protect the river environment. Therefore, the States of Idaho and Washington may as well have until Congress is ready to act to try to formulate an adequate plan of management and protection, as the report recommends. HIBEK, INC. THE SEWING CENTER 519 MAIN STREET LEWISTON, IDAHO 33501 DUNS NO. 05-753-3671

SINGER

U. S. CONSUMER PRODUCTS DIVISION

(208) 743-5051

8 August 1979

Russell E. Dickenson, Regional Director National Park Service, Pacific Northwest Region 601 Fourth & Pike Building Seattle, WA 98010

Dear Mr. Dickenson,

I firmly believe that the 33-mile portion of the Snake River south of Asotin, WA should be under county control. Lewis-Clark valley residents have historically used this section of river for unlimited recreation which provides the quality of life we enjoy. We feel that such use of our river could be severly restricted if if this section of the river is put under federal control. I therefore urge that you do not attempt to include it in the National Wild and Senic Rivers System.

Very truly yours,

Ira B. Holst President

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UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

Room 345, 304 North 8th Street, Boise, Idaho 83702

July 9, 1979

Russell E. Dickenson Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

Dear Mr. Dickenson:

We have reviewed the draft study report/environmental statement for the proposal to designate a 33-mile portion of the Snake River as a National Wild and Scenic River and find this proposal will have no significant impacts on agricultural or other resources within our field of expertise. We have no comments on this draft proposal.

We wish to thank you for the opportunity to review and comment on this draft study report.

Sincerely,

Amos I. Garrison, Jr.

Allos I. Garrison, Jr. State Conservationist

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United States Department of Agriculture

Soil Service

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

July 30, 1979

Russell E. Dickenson Regional Director National Park Service Pacific Northwest Region Fourth and Pike Building Seattle, Washington 98101

Dear Mr. Dickenson:

We have reviewed your draft environmental impact statement for Snake Wild and Scenic River Study, and find the concerns of the Soil Conservation Service have been met. We have no comments to offer at this time.

Thank you for the opportunity to review your draft. If we can be of assistance to you on your project, please let us know.

Rubert & Porter acting

Galen S. Bridge State Conservationist

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July 5, 1979

Dear Sirs:

In reviewing your Wild and ^Scenic River study-Draft report/ Enviornmental Statement, I am amazed first off by the amount of paper work and details in the report. It must have cost a pretty penny:

My husband and I and family operate a cattle ranching set-up further up the river at Dug Bar, so have become familiarized with N.R.A. procedures and impact studies etc., etc., etc., etc., etc.

Now it appears that a further study on the Snake is at hand----Concerning our holdings now at Rigersburg; lands owned jointly by the Tippett family (Tippett Land Corp.) will be in the study area.

It seems a shame to me what people borne of hard working fore-fathers of these present day land owners have had to endure. They have worked so hard to keep and maintain as best they saw fit this land bequeathed by rights to them.

I realize some restrictions must be imposed to protect the Wild and Scenic Rivers--No one appreciates their values more than the landowners that reside or own portions along its banks.

These ranchers are the original conservationist, not the new breed of radicals who only visit the canvon occaisionaly. The ranchers and present owners have endured hardships and wor ked long and hard for their constitutional right to own this land.

Therefore, I am for alternative TWO-- no action. The upper 11 miles and lower 22 miles from the mouth of the Grande Ronde are not suitable for a Wild and Scenic River anyway. In my opinion that stretch does not and cannot qualify for these attributes as developemnt has already progressed to a point where it would be ridiculous to turn it back to a wild state. I feel the limestone supply should be allowed to be developed as desired by the present land-owners. This is their land and should reain so. The upper reaches of the already established N.R.A. are lovely and wild-although, I believe the ranchers were doing a fine iob of being conservationist and stewards of the land and canyon. booking at ranches along the way is interesting to the boat traveler and adds a valuable educational point to people who haven't the vapest notion of where their butcher shop meat comes from. Or more so what it entails to bring that hamburger or lamb chop that far. The mild canyon winters are ideally suited to lambing and calving out the mamma cow or ewe. Months of constant care go into bringing that meat to the table in a far-a-way city.

In summary first of all we <u>all</u> love the Snake, Salmon, Imnaha and Grande Ronde with it's miles of stillness and silence, but lets keep the American dream of working hard for something and having a legacy to leave our children in land and ownership in Agriculture. These young ones will be a dying breed if we don't. Let the responsility of caring for these lands not yet affected by the N.R.A. be under the present owners jurisdiction to do as they have in the past.

Sincerely,

mua Doug (-gane) Tropett

AUG 20'79

TIPPETT LAND & MORTGAGE COMPANY 3400 W. CLEARWATER, SUITE 4

KENNEWICK, WASHINGTON 99336 (509) 783-4126

August 17, 1979

Russell E. Dickenson Regional Director Pacific Northwest Region National 601 Fourth and Pike Building Seattle, WA 98101

Re: <u>Wild and Scenic Rivers Act</u>

Dear Mr. Dickenson:

I am a Landowner involved in the Ownership of several parcels of property located in the 33-Mile portion of the Snake River that is proposed to be included in the Wild and Scenic River System. I am a Landowner as an individual, as a Member of a Partnership, and as a Stockholder in two Corporations involved in Land Ownership in that area. These entities are Chimney Bar Partnership, Tippett Land and Mortgage Company and Tippett Land Corporation.

This is to advise you that I go on record as opposing any change in the present status of that area. In other words I am opposed to the inclusion of this area in the Wild and Scenic River System in any manner. My Ownerships in this area involve some very valuable resources, including limestone and recreational development. These resources should not be locked in a sterile, tightly Federal Controlled Stewardship. There is already enough of that in the present NRA.

However, if it must be included, then my choice of the various alternatives to the proposed action is Alternative No. 4, whereby the local counties would control the 29 miles downstream from Hell's Canyon NRA.

> Very truly yours, Robert A. Tippett

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Tippett Lend Corporation Rt, 1 Box 185 Enterprise, Oregon 97828 August 7, 1979

Russell E. Dichenson, Regional Director Pacific Morthwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

Dear Mr. Dickenson,

We have studied carefully the Draft Report/Enviormmental Statement relating to the Snake Wild and Scenic River Study. Our conclusions are that this is another continuing example of the Government againing private land by manipulation. The study makes an excellent case for increasing the Euresucracy that is threatening every American.

It is beyond question that with the financial resources and manpower available to the Department of the Interior, the study could have been prepared to reflect any of the wishes of the Forest Service, National Park Service and the Fish and Wildlife Service, and so it has. The pattern for equivition is the same. The Middle Snake, Miaam, Wallove and hundreds of other areas throughout the U.S.A. In the profound wisdow of our Government, the flowers of the land brought to maturity by mother nature and man, must now be pluched for preservation. For Whom? Why not just leave the Snake River and its environs as it was. The study shows the wonders of this area. Those marvelous natural blessings have been there cince the beginning of time and besutifully preserved until the meddeline by the United States Government.

It would be interesting to have your people define preservation as it relates to this specific project. Not long ago, perhaps 10 years, the Snake from Asotim to Hells Canyon and beyond was wild and beautiful. Visitors were few and wore thrilled by the scenic beauty wildness. Others were the ranchers who lived there, loved it and cared for it because it was survival. Now it appears a well known fact that a thousand or more boats of every bind use the river between Clarkston and Hells Canyon on any given weekend. Would it have note a difference in your report if pictures and statements showing the deterioration of the Snake from the debris and shuse from these bosters and compare---of course it would.

This emphasizes the question-preservation of our natural resources-for when! To summarize, we are a family corporation and during the last 90 years have played a part in the preservation of the Snake River country, and including our own home ranch on the Joseph Greek. It is now in the hands of the State of Washington Fish and Wildlife Department. It has been a losing battle over the years but we keep trying. Being much closer to the problem than those that made up the report, we do not want the Government to take away anymore land and control it under the transparent excuse of preservation for posterity.

Our conclusions are a resounding vote for alternative Plan #4 NO ACTIONI If we need help in the future we will do it locally.

Sincerely, Tanhava uppett t

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Barbara Tippett Fredrick Vice, President

Comments of Tippett Land Corporation dated August 7, 1979

1. Whether or not the study segment is added to the National Wild and Scenic Rivers System, its use by the public for floating, jet boating, backpacking, camping, and other recreational purposes will continue to increase. Experience has shown that unless such outstanding scenic and recreational areas are properly protected and managed, recreation use will increase to the point that the resource can be severely damaged and the quality of recreation experience people seek substantially impaired. Thus, designation of the study segment will help to prevent the very problems you see occurring. *r*

WARE, STELLMON & O'CONNELL LAWYERS LEWISTON PROFESSIONAL BUILDING 1219 IDAHO STREET P. O. DRAWER 835 LEWISTON, IDAHO 83501 TELEPHONE (206) 743-1516

July 29, 1979

Mr. Russell E. Dickenson, Regional Director Pacific Northwest Region, National Park Service 601 Fourth & Pike Building Seattle, Washington 98101

Re: Snake Wild and Scenic River Study, April, 1979

Dear Mr. Dickenson:

I have carefully read and considered the Draft Report/Environmental Statement respecting the 33-mile portion of the Snake River above Asotin. I prefer Alternative 1, the Recommended Plan, as the one best suited for the area. I feel definitely that the States of Idaho and Washington should be given adequate opportunity to assess their possible interest in administering the study segment extending 22 miles downstream from the Grande Ronde River. However, during the time that the States in question are deciding whether or not to participate, it is very important in my opinion that the status quo be maintained to prevent further deterioration in the area. Should these States decline to join in the matter, after a reasonable designated period has been given them to so do, then I favor Alternative 6. It is my hope that Washington and Idaho will both determine to support effectively Alternative 1. I consider it very important that the State and Federal authorities determine to work together in this vital area.

Cordially yours,

Marcus J. Ware

MJW/hgw



STATE OF WASHINGTON

OFFICE OF THE GOVERNOR

Legislative Building, Olympia, Westington 98604

Dixy Lee Ray Gouernor

July 27, 1979

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DEPT. OF THE INTERIOR

Mr. Robert L. Herbst Assistant Secretary Department of the Interior Washington, D. C. 20240

Dear Mr. Herbst:

Thank you for sending me a copy of the Department of the Interior's draft report on the proposed Snake Wild and Scenic River.

I am pleased with the recommendation that the states of Idaho and Washington be given the opportunity to administer a 22-mile reach of this river, rather than have it added to the federal system. I have already discussed this concept with Governor Evans of Idaho and we intend to continue our discussions in the near future.

I believe a workable management program can be developed between the two states that will provide for recreational use of the river and will provide more locally acceptable land use controls than would be possible with federal designation. We will need adequate time to develop the program, which may require state legislation. Our next regular legislative session will not occur until 1981.

Sincerely Dixy Lee Ray Governor



STATE OF WASHINGTON

Dixy Lee Ray Governor

30 November 1979

DEPARTMENT OF GAME

600 North Capitol Way, GJ-11 Olympia, WA 98504

206/753-5700



1

Mr. Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

> DRAFT REPORT/ENVIRONMENTAL STATEMENT (ES) Snake Wild and Scenic River Study

Mr. Dickenson:

Your document has been reviewed by our staff as requested; comments follow.

Our agency concurs with the findings in this report, and we agree with "Alternative 1", as the recommended plan for preserving and protecting the values and criteria that qualify the free flowing Snake River for inclusion in the National Wild and Scenic Rivers System (NWSR).

A few specific comments on material found in your discussion of wildlife in, <u>B.</u> <u>Description of the Study Area</u>, might help improve the document.

Though the paragraphs discussing fauna on pages 43 and 45 are successful in describing the diversity of wildlife in the study area, it would be appropriate in this case to append a more complete list of vertebrate species to be found. We suggest this because a paragraph on birds (page 43) did not mention waterfowl, shorebirds, gulls, buteonine hawks, accipitrine hawks, and other birds which characterize the river, riparian zones, canyon, and canyon rim of the study area.

It may be incorrect to describe wintering bald eagle use as "a few pair of bald eagles". Wintering bald eagles may or may not be found in company with their mates from breeding season, and immature birds do not pair at any time of year.

The last sentence of the first paragraph, page 45, describes "cotticks" among other fishes listed by their common names. The proper spelling is "cottids", describing fish of the family cottidae. Since you list the other fish by their common names, you may wish to refer to cottids simply as sculpins. page 2 Mr. Russell E. Dickenson, Regional Director 30 November 1979

Thank you for the opportunity to review your Draft Environmental Statement. We hope our statements are helpful.

Sincerely,

THE DEPARTMENT OF GAME nel

Douglass Pineo, Applied Ecologist Environmental Affairs Program Habitat Management Division

DP:bj cc:Agencies Regional Manager Comments of the Washington State Department of Game dated November 30, 1979

1. The report has been revised as suggested.



STATE OF WASHINGTON

Department of Natural Resources

COMMISSIONER BERT L. COLE

> R. A. BESWICK SUPERVISOR

713 E. Bowers Rd. Ellensburg, WA 98926



AREA

July 5, 1979

Russel E. Dickenson, Regional Director Pacific N.W. Region National Park Service 601 Fourth and Pike Building Seattle, WA 98101

L 5815 (PNR) PCR Snake River



Dear Sir:

RE :

The Southeast area of the Department of Natural Resources favors Alternative eight (8) on the Snake Wild and Scenic River Study. The Snake River from the Grande Ronde River up stream should remain under Forest Service Administration. Our Area manages the Shorelines on the Washington side of the Snake River. The Snake River from the Grande Ronde downstream should remain for owners of residences, agriculture and commercial operations.



Sincerely,

BERT L. COLE Commissioner of Public Lands

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Orrin N. Green Asst, Area Manager Southeast Area

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	Russell E. Dick Pacific Northwe National Park S 601 Fourth and Seattle WA 981	enson est Region ervice Pike Building				DEC DEC VR	5	
	Dear Mr. Dicken	ison:				140	oon lange	

We are in receipt of the Draft Report/Environmental Statement for the Snake Wild and Scenic River Study. We note your commitment to continued coordination with the Advisory Council on Historic Preservation and the State Historic Preservation Officers. We will be pleased to work with your staff on the development of management and development plans.

We would like to point out that alternative 6 and 7 provide the greatest range of protection and consideration of the cultural resources. Both of these alternatives bring the cultural resources under the protection and purview of federal legislation. Alternative 1, preferred by the National Park Service, would provide only marginal protection for the cultural environment, as the states do not have the legal, financial, and human resources necessary for resource management.

Thank you for this opportunity to comment and for your consideration of our cultural heritage.

Sincerely,

JEANNE M. WELCH, Deputy State Historic Preservation Officer

Sheila A. Stump, Archaeologist

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A STATE OF STATE OF STATE OF	WASHINGTON S'LATE PARKS AND RECREATION COMMISSIO			
	August 15, 1979	AUG 16 79		
Russell F Dickenson		HP3-PNRO Init Date		

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Central Files Action Taken

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Russell E. Dickenson Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

Ref: L 5815 (PNR) PCR - SNAKE RIVER

Dear Mr. Dickenson:

The staff of Washington State Parks and Recreation Commission has reviewed the draft report/environmental statement for the Snake River Wild and Scenic Study and offer the following comments:

1. <u>Page 49, Table 7: Comparison of Recreation Use at Coche Creek on</u> the Middle Snake River, 1969 and 1974.

Ken Wilty shows that recreational use - mostly float boating - increased 54.1 percent. To show such an increase, it must be assumed that the "unavailable" data for float boaters in 1969 is interpreted to mean zero recreation days existed. The same interpretation is also found in the "unavailable" data catogorized under angler days. It is inaccurate to determine a percentage change for <u>total</u> recreation days and angler days based upon unavailable data for one of the included years.

2. State Parks original position provided for federal administration of the entire study area. Under federal administration, private property composing 74 percent of the river area - could be managed most effectively. At the present time Washington State Scenic Rivers Program has no provisions for privately owned property - the rights of condemnation or eminent domain do not exist.

We are pleased, however, that our alternate choice, allowing for both state and federal administration, was recommended. Such an alternative appears best in serving the long and vigorous attempts by conservationists and recreationists to save this outstanding river and corridor.

Thank you for the opportunity to review and comment.

Sincerely,

Bernard Warner Administrative Intern

<u>Comments of the Washington State Parks and Recreation Commission</u> <u>dated August 15, 1979</u>

1. The table in question has been removed from the report.

WWP 115 REV. 8-73



THE WASHINGTON WATER POWER COMPANY

August 9, 1979

WENDELL J. SATRE PRESIDENT CHAIRMAN OF THE BOARD

> Mr. Russell E. Dickenson Regional Director Pacific Northwest Region National Park Service 601 - 4th & Pike Building Seattle, Washington 98101

Dear Sir:

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P.O. BOX 3727 + SPOKANE, WASHINGTON 92270 (5991 300500

Re: L5815 (PNR) PCR Snake River - Comments on Draft Study Report/ Environmental Statement

The Snake Wild and Scenic River Study Draft Report/Environmental Statement, Department of the Interior, National Park Service, April, 1979, lists The Washington Water Power Company as being represented on a multi-disciplinary and interagency study team connected with the preparation of this draft statement.

While we appreciate that we have had the opportunity to provide input into the draft statement, we would like to make it clear that the statement, as produced, represents little of the thinking or opinions of either this Company or of its representative, and we disagree with the recommendation as set forth in this statement.

It would not be possible in the time available to us to go into every detail of the report, and we, therefore, will only highlight our major disagreements.

First, in the basic findings on page 5, it is reported that the conclusion of the study is that the entire 33-mile northerly flowing segment of the river, as illustrated on map 2, meets the five eligibility criteria listed. We seriously question whether this segment meets the intent of the criteria and, Mr. Russell E. Dickenson

particularly, we question whether it "possesses <u>outstandingly</u> remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values, and question whether it contains high water quality or is restorable to that condition. If this segment of the Snake River meets that criteria, it would appear that any undeveloped river in the United States meets those criteria, and the criteria become meaningless.

- 2 -

In examining the various details, it is quite obvious that the recommendation which is made was determined prior to the evaluation of any of the component parts. All factors favorable to the recommendation were then exaggerated and those unfavorable were minimized. For instance, on page 11, estimate of land values, which includes extremely valuable limestone properties are presumed to be acquired by purchase at \$500 an acre and \$200 for a scenic easement, a total of \$304,000, which apparently is assumed to lock up and destroy the value of millions of dollars' worth of properties.

The question of whether the Asotin Dam should be built is passed off rather lightly on the basis that it is unlikely that it would be built due to continuing strong opposition, this in the face of legislative memorials to Congress by the Idaho Legislature asking that it be reauthorized and in spite of the fact that, even without it being reauthorized, it could be constructed by utilities under the Federal Power Act. We are familar with the comments of the Pacific Northwest Generating Company which point out in detail the understatements relating to power development and concur in their statements. The draft statement does not in any way properly indicate the trade-off between hydroelectric development which has a minimal effect on the environment and utilizes a renewable resource as compared to the alternative of construction of nuclear and coal-fired plants, both of which have a potentially much greater adverse effect on the environment.

The statement assumes that there will be no serious adverse effect on the local economy. On the contrary, the proposal assumes that even more of the already extensive properties located in northern Idaho that are presently locked up from development would be locked up and unavailable for further development. The potential of the area to provide a high quality life, including jobs, for an expanding population would be seriously curtailed.

And most importantly to this Company, the rather cavalier attitude toward the limestone deposits owned by this Company's wholly-owned subsidiary is characteristic of the entire report. No study has been made; no facts have been recited. On the contrary, the problem is resolved by 2

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Mr. Russell E. Dickenson - 3 -

speculating that first, because the resources have not been developed, they will never be economic, which if carried to its logical conclusion means that no undeveloped property shall ever be developed. Our Limepoint property is part of the largest lime deposit known in the Northwest. Our reports from private consultants indicate that the lime may be used in the following:

> Beet sugar industry Agriculture limestone Lime plants producing hydrated, caustic and pebble lime Steel industry Aluminum industry Paper industry Water purification and treatment plants Sewage treatment plants Construction industry Chemical and pharmaceutical industry Mining industry Highway construction (road stabilization and other) Manufacturing Portland cement

Both Tidewater Oil Company and Knappton have indicated that under present conditions they could barge lime from Limepoint to Clarkston nine months each year. Of course, if the Asotin Dam had locks, then they could barge all year around. For the past five years we have been working with a well-known firm concerning development of the Limepoint property. If it were possible to barge the lime out, this firm proposes a \$60,000,000 facility to be located in the Lewiston-Clarkston area, which would employ about 100 people at just the plant site. In addition, our own company is interested in developing the lime deposit for use in our planned large thermal power plant for use in scrubbers for cleaning up flue gases.

Another of the built-in biases in the report relate to fish and recreation. The assumptions with respect to fish are completely undocumented and pure speculation. The figures under Benefits 6 - Recreation, showing tremendous numbers of recreation days under the recommended alternative and just slightly over 1/10 that many recreation benefits under Alternative 3 are obviously and patently false. The capacity of the river to provide for recreation with the Asotin Dam in place is much greater than the restricted capacity of the river in its natural state. The attempt to cover this up by a note that the "Imposition of a recreation carrying capacity may limit the increase" with respect to the recommended plan is a poor substitute for a realistic appraisal of the recreation benefits. Mr. Russell E. Dickenson

- 4 -

In summary, it is our opinion that the draft report/environmental statement is inadequate and evidences a preconceived bias. It is time that more consideration be given to human values and the aspirations of the ordinary people who desire a better life and less attention paid to the recreational elite for whom already millions of acres of this country's lands have been tied up. In deference to our customers and to the electric customers of all the Pacific Northwest utilities who are facing real shortages of electric energy, we must insist that needs of the people for energy be given greater consideration. We must resist the tendency to lock up every remaining river in the United States. Hydroelectric development should be an essential element of the solution to our energy problem. The Recommended Plan directly conflicts with our national goals to reduce this country's dependence on imports and to reduce its balance of payment deficit.

Sincerely,

N. J. Satre

Wendell J. Satre President

S.bw

Comments of The Washington Water Power Company dated August 9, 1979

- 1. The report has been revised to include more current land value information.
- 2. Information about the benefits and costs of an Asotin Dam project has been added to the report.
- 3. The report has been revised to include additional information about the limestone deposits and the expectations of Washington Water Power for its deposits.
- 4. The discussions on fish and recreation have been revised, based on more recent information.

AUS 1 4 '79 NPS-PNRO Init Date

WHITEWATER NORTHWEST 3101 N. E. 41st Avenue Portland, Oregon 97212

August 9, 1979

Russell E. Dickenson Regional Director National Park Service Fourth and Pike Building Seattle, Washington 98101

Dear Mr. Dickenson:

This letter responds to your request for comments on the Snake Wild and Scenic River Study sent with your letter of June 27, 1979. The report incorporates a draft environmental impact statement, which is perhaps convenient to the writer but is disconcerting to the reader trying to understand the proposal. The report is nontheless well done, particularly the display of accounts with respect to evaluation according to the federal "Principles and Standards" for evaluation of federal water resources proposals.

Our commenting group is called "Whitewater Northwest." We are drawn together out of a common interest in wild and scenic rivers, their preservation and management. Our members were initially solicited from the ranks of various outdoor groups in the Northwest, such as Izaac Walton League, Sierra Club, Oregon Environmental Council, Audubon Society, Oregon Guides Association and Northwest Steelheaders. Members are knowledgable about rivers in question from direct experience in floating or running or through study of available information. It is the group's intention to speak out for various rivers having potential for classification under either state or federal law, including advice and comment to agencies such as N.P.S. which are directly involved in studying or managing Northwest rivers. The group will also speak out with respect to already classified wild and scenic rivers as they are managed.

With respect to the 33-mile Snake River segment under study, we offer the following comments:

1. The group's interest is primarily with respect to the upper 11 miles above the Grande Ronde and to see that this 11 miles achieves classification. Having emphasized that interest and agreeing with the study logic of considering the river in segments as you have, we go on to say,

Russell E. Dickenson National Park Service August 9, 1979 Page Two

2. Our preference is for Alternative #6, rather than the report recommendation of Alternative #1. Although Alt. 1 has much to commend it and might achieve satisfactory results under ideal circumstances, these circumstances do not now exist. For example, neither Idaho nor Washington now have the machinery necessary to successfully provide a management plan and its implementation. Alt. 1 neglects Oregon because the Oregon portion is upstream from the proposed state managed portion. Oregonians nonetheless have considerable interest, particularly with respect to the future interrelationship with a possible classification of the Grande Ronde River.

Further, with respect to Alt. 6, this is one river and would therefore be more reasonably managed by <u>one</u> manager, to wit: the federal Forest Service. Although outside National Forest boundaries, the lower segment below the Grande Ronde could readily be included by the F.S., which already manages the upstream National Recreation Area. It seems reasonable that there will exist a close relationship between the lower river management and the upper river, even though the lower river is much more recreational in use. Therefore, one managing agency is recommended.

- We are especially interested in archeologic preservation at Buffalo Eddie and historical attention and protection of the Nez Perce burial ground.
- 4. As a detail, our strong preference would be for the designation of the lower extremity of the upper 11 miles to be specified by river mile at Heller's Bar. This more clear cut and positive identification is perhaps intended or planned, but if so, the particular extremity needs further description so there can be no confusion as to what is being considered.
- 5. As Whitewater Northwest perceives the public interest, the river's management once it is classified becomes very important. The state or federal agency niceties with respect to boundaries and who manages what should be set aside in the interest of achieving the best possible management consistent with the Wild and Scenic Rivers Act and the implementing acts and administrative regulations.

Thank you for the opportunity to comment. Whitewater Northwest will appreciate being kept up to date as the report progresses and will respond to further action such as public hearings, once the report moves to that stage.

Sincerely, Kobert Marile Sta Robert McNeil

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Chairman for the Snake River

RM:pr

Comments of Whitewater Northwest dated August 9, 1979

1. Alternative 2 in the revised report doesn't "neglect" the 4 miles of river bordering Oregon. It recommends that Congress add the upper 11 miles, including the 4 miles bordering Oregon, to the National System for administration by the Forest Service.

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1301 - 11th Clarkston, Wa. 99403

8 August 1979

Russell E. Dickenson, Regional Director Pacific Northwest Region National Park Service 601 Fourth and Pike Building Seattle, Washington 98101

Dear Mr. Dickenson,

I have reviewed the Draft Snake Wild and Scenic River Study and am submitting the following comments for the record:

- <u>Administration</u> On page 8, I find a statement reading, "Administration would be in accordance with a management plan prepared jointly by the two States and found acceptable by the Secretary of the Interior, which would serve to protect the scenic and recreation qualities of the river corridor." I feel that a statement should be added indicating that failure to adhere to the plan would result in transfer of management of the study area to the Federal Government. The public must be assured that reductions in tax revenues, or other problems, will not result in failure to adhere to the approved management plan.
- Law Enforcement The status of enforcement services, and the funding of same is unclear to me. On page 15 it is "recommended" that the State of Washington or Asotin County patrol the river road. On page 61 I read that "the cost of maintaining and patroling the county road would <u>likely remain</u> the responsibility of Asotin County". Item 12, under Mitigating Measures, page 63, says "financial assistance may be available from Federal or State sources to local law enforcement agencies. On page 88 it says "enforcement would be performed by the local agencies in cooperation with USFS and States. USFS <u>could</u> subsidize local law enforcement agencies. Clarification is recommended. I prefer the situation described on page 88.

<u>Recreation Element Comparative Evaluation</u> - Why is the Alternative 6 analysis "similar to Alternative 2", the no action alternative (page 85)? I feel the text indicates it should instead be very similar to Alternative 1.

L. Wolcott

page 2

I personally support Alternative 6, placing the entire 33 mile study area under Forest Service Administration. My reasoning on this is:

- A. The Federal Government would manage the entire area without cost to local or State Governments, and local government would continue to collect taxes on scenic easement land. This is important to me as a property owner and tax payer in Asotin County.
- B. Under any protective alternative the ultimate direction for management comes from the Secretary of the Interior. This weakens any argument for local or State control.
- C. Annual operation and maintenance costs for similar services are lower under Alternative 6 than under the recommended alternative (page 88).
- D. I believe Federal management is less subject to funding vacillations and local developmental pressures.

Sincerely,

Junda Wolcoth

Linda Wolcott

Comments of Linda Wolcott dated August 8, 1979

- 1. To be considered adequate by the Secretary of the Interior, a joint Idaho-Washington plan for the lower 22 miles would have to include assurances that the protection provided would be permanent.
- 2. The report has been revised to clarify where the responsibility for law enforcement would lie, and whether or not financial assistance is available to local law enforcement agencies.
- 3. The report has been revised as suggested.

APPENDIX 2

LETTERS

COLUMBIA RIVER FISHERIES COUNCIL

LLOYD BUILDING • SUITE 250 700 N. E. MULTNOMAH STREET PORTLAND, GREGON 97232

(503) 231-2241 FT6 429-2241 OFFICE OF EXECUTIVE SECRETARY

September 7, 1979

Mr. Stan Young National Park Service Pacific Northwest Region Fourth and Pike Building Seattle, WA. 98101

Dear Mr. Young:

I apologize for not responding sooner to your letter of August 21 concerning the Snake Wild and Scenic River Study. I have been out of the office most of the past two weeks.

Concerning the Port of Clarkston letter, it is not at all clear how the values of \$300 million to \$700 million were obtained for power benefits. Undoubtedly it includes benefits from High Mountain Sheep and possibly projects on the Salmon River, all of which would be disastrous from the standpoint of anadromous fish. It is interesting to note that the so-called "Red Book", dated April 1979, issued by the Power Planning Committee of the Pacific Northwest River Basins Commission, entitled "Review of Power Planning in the Pacific Northwest, Calendar Year 1978" does not include High Mountain Sheep nor Salmon River projects in its listing of potential hydroelectric projects. Nor does it list the Asotin project.

The Port of Clarkston letter makes reference to the need for 3 million acre feet of stored water in the Snake River drainage for facilitating downstream migration of smolts. While it is true that the fishery agencies have recommended the use of stored water for this purpose, it has been made abundantly clear that such storage should be constructed upstream from the anadromous fish habitat. Storage at Asotin, High Mountain Sheep, and/or China Gardens would be completely unsatisfactory to the fishery agencies. As a matter of fact a single project at Asotin would likely be disastrous in view of the already tenuous situation that exists whereby fish destined for the middle Snake and Salmon Rivers must pass eight dams in route to their spawning grounds.

In regard to the Public Power Council letter of August 10, the conclusion on page 4, in the second paragraph, to the effect that Asotin Dam would result in improvements to the barging of downstream migrants, is completely erroneous. The existence of the Asotin Dam would in fact present a more complex situation for both the barging and flushing of fish downstream. In summary, I feel that the letters of the Port of Clarkston and the Public Power Council are misleading in regard to their conclusions. I'll be glad to discuss these matters further with you at your convenience.

Sincerely yours,

ING

Terry Holubetz, Executive Secretary Columbia River Fisheries Council

STATE OF IDAHO

DEPARTMENT OF FISH AND GAME 600 SO. WALNUT ST. - P. O. BOX 25 BOISE, IDAHO 83707

September 6, 1979

Mr. Stan Young, Chief River, Trail and Water Project Studies National Park Service Pacific Northwest Region Fourth and Pike Building Seattle, WA 98101

Dear Mr. Young:

We are pleased to provide your agency with our technical assistance to help you adequately and accurately assess the impacts which full development of the 33-mile study segment of the Snake River might have.

The letters which you have referred to us contain several of what we believe to be misunderstandings or misrepresentations of available fisheries and recreation data. Since both letters address several common points, we will respond to them jointly, by topic.

Recreation Values

On page 2 (first full paragraph, third sentence) of the PPC letter, the respondents allude to an increased recreational value of the Asotin pool. It is very doubtful that the larger body of water created by the Asotin Dam would have greater recreational value than the present flowing river. The very popular white sand beaches would be lost, fishing opportunity for anadromous and resident fish would be greatly decreased and water quality could be reduced. (Idaho Department of Health and Welfare has found significant water quality problems in the Lower Granite Reservoir.)

The present flowing river in the study section is highly accessible to family type boating and fishing opportunities. The reservoir would not enhance recreation access.

Holubetz and Simons (1974) found a greater recreational use of the unimpounded sections rather than the impounded portions of the Columbia and Snake Rivers. They concluded that any further development of dams on these rivers would result in a net loss of recreational value.

Paragraph three on page two of the PPC letter alludes to an abundance of similar recreation areas within the region. The comparison is highly superficial. The 3.4 million acres which they refer to is primarily land area, not river corridor. From its mouth to the foot of Hells Canyon Dam, 60 percent of the

EQUAL OPPORTUNITY EMPLOYER

Snake River is already impounded and the Asotin pool would increase this amount to 71 percent. The flowing portion of the lower Snake River is the largest river in Idaho and has the greatest fish species diversity of any river in the state. Similar recreational opportunities are not readily duplicated.

The presentation of fishery economic benefits ascribed to the three-dam complex by the Port of Clarkston, while being unrealistic (as referred to later), is based on faulty assumptions. It calculates the total benefits as the sum of benefits from all uses without figuring in the costs incurred due to the fact that several of the uses are competitive rather than additive (i.e., water for fish flows versus water for power, navigation, etc.).

White Sturgeon

Paragraph one on page four of the PPC letter questions the effect of impoundments on white sturgeon. White sturgeon have shown a definite preference to live in flowing water. They utilize flowing water areas for spawning and their food habits and needs are adapted to feeding on benthic organisms which are generally more abundant in the flowing portions of the Snake than in the impoundments.

Coon, et al. (1977) placed sonic transmitters on nine sturgeon within the Lower Granite pool area prior to impoundment. No significant movement was observed prior to February 14 when impoundment began. Upon impoundment all nine sturgeon began moving upstream. Four months later, six tags were still functioning and showed that these six fish were residing in the area below the mouth of the Clearwater River where significant current still existed (the mean distance of upstream migration was 19.7 miles).

Haynes, et al. (1978) placed radio transmitters on 29 white sturgeon in the mid-Columbia River. Only three of these fish moved into the McNary pool. One returned upstream shortly after entering the upper reaches of the reservoir. The other two fish moved to the mouths of the Snake and Walla Walla Rivers.

Sampling of white sturgeon in the lower Columbia River by U.S. Fish and Wildlife Service personnel indicates that the majority of medium-to-large size sturgeon reside in the flowing tailrace area immediately below each dam.

Sturgeon are not caught in the reservoirs of the mid-Snake River, but are caught in the flowing river portions between Brownlee Reservoir and C.J. Strike Dam and in the flowing areas above C.J. Strike Reservoir.

Coon, et al. (1977) has found a very slow growth rate among mid-Snake white sturgeon. He postulates that changes to the environment brought about by upstream and downstream dams may be severely limiting the growth potential of the fish in that portion of the river. Further impoundment by Asotin Dam would only serve to increase the severity of this problem. Total impoundment of the mid-Snake as proposed by the Port of Clarkston would essentially eliminate the white sturgeon population there.

Anadromous Fish

<u>Water Storage Augmentation</u>: The need for obtaining sufficient flows for the spring outmigration of juvenile anadromous fish is certainly valid. However, the proposal by the Port of Clarkston for a three-dam complex on the mid-Snake River would not achieve the flow augmentation implied in the letter, would devastate the existing Snake River anadromous fish runs, and would eliminate significant potential fishing opportunities.

The premise by the Port of Clarkston that the three-dam complex would enhance or save the anadromous fish runs by providing over three million acre-feet of storage is superficial. To begin with, data from the Idaho Department of Water Resources indicate the usable storage of High Mountain Sheep Dam to be 2.3 million rather than 3.6 million acre-feet. The usable storage at China Gardens and Asotin dams is only pondage that would be used for daily and weekly power peaking and would not increase the average daily or weekly flow of the river for the smolt migration.

The fact that this three-dam complex might contain nearly the same amount of storage as the River Basins' Report indicated anadromous fish needed in a drought year bears little relationship to the outmigration problem. Whatever the amount of storage in the dam complex, we could expect to see only a small portion or none at all reserved for fishery enhancement. The additional storage would be coordinated into the Northwest power system and released to meet power demand. This would mean spring storage and peak releases in winter and mid summer (if irrigation pumping were served by the dams). This type of operation, with the increased control of the spring freshet which it would provide, would only serve to further aggravate our migration problem.

If the Port of Clarkston really intends that we use the three million acrefeet of water in a drought year for fish migration and a proportionate amount in all below-normal water years, then they should refigure their power benefits which obviously do not take this priority into account. Evidence submitted in the High Mountain Sheep FPC hearings indicate that either individually or collectively, High Mountain Sheep and China Gardens Dams would, in their own right, have severe adverse impacts on the Salmon, Immaha and mid-Snake anadromous fish runs.

In reality, the Port of Clarkston proposal and the above discussion are meaningless as PL 94-199 specifically prohibits dam construction at the High Mountain Sheep and China Garden sites.

Direct Dam and Reservoir Impacts: Our remarks in this section will deal only with Asotin Dam as it is the only realistic possibility under existing legislation. Dam construction in addition to Asotin would have similar, additive and compounding effects.

Construction of Asotin Dam would have the following effects on anadromous fishery resources:

- 1) It would remove about 30 percent of the remaining spawning area and rearing habitat of Snake River fall chinook. This stock of salmon has already lost, through dam construction, 500 of the original 600 miles of spawning and rearing area which was available to it. A run of less than 2,000 fish now enter the Snake River compared to over 20,000 fish as little as eleven years ago. The status of Snake River fall chinook is being studied to determine the need for placing this stock under the provisions of the Endangered Species Act.
- 2) It would increase the adult mortality on all anadromous fish stocks passing above the dam and could also increase the mortality of Clearwater steelhead as many of these fish stray up the Snake River prior to entering the Clearwater to spawn. Upstream dam passage mortalities may average close to 15 percent at some dams, depending on river conditions and dam pecularities.
- 3) Downstream dam passage mortalities now average about 15 to 20 percent per dam in a normal flow year. Mortalities in below normal flow years are greater. The average per dam mortality accumulates to a 73 to 83 percent total mortality rate after passing eight dams and a 77 to 87 percent rate after nine dams. Existing mortality rates are obviously at the point of no return. Another increment of mortality added by Asotin Dam could well be the end.

Collection efficiency of the present traveling screens used at Lower Granite and Little Goose Dams to trap smolts for transport to below Bonneville Dam has averaged only 56 percent over the past three years. Handling mortalities are still very high and the operational phase of transportation has yet to be proven as a workable solution to the smolt migration problem. The proposed Asotin Dam would do nothing to improve smolt transport by barge or truck.

- 4) In a drought year it would increase downstream migrant mortalities due to residualism in the reservoir. Flows from the Clearwater River and Dworshak storage could not be used to help move Salmon River smolts to the dam collection facilities as is now possible in the Lower Granite pool.
- 5) It would increase the population of squawfish in the proposed pool area. In slack water areas, particularly near the dams where smolts become concentrated and disoriented, large populations of squawfish prey heavily upon the young salmon and steelhead.
- 6) It would severely depress successful fishing for anadromous adults in the 29 miles of impoundment and thereby concentrate more anglers in the remaining portion of the river and force them to travel greater distances to fish. Essentially the last remaining Snake River salmon and steelhead fishery in the state of Washington would be for all practical purposes eliminated.

Successful anadromous sport fisheries have never developed in the impounded portions of the Snake River (other than in the tailraces). The U.S. Army Corps of Engineers paid angler expenses and used radio-tagged fish to help anglers locate fish migration routes in the Ice Harbor pool. Angling results were still not encouraging. (Tri-State Steelheaders, 1970).

Additional Comments

The temperature problem mentioned by the Port of Clarkston occurs only sporadically and generally affects only a portion of the steelhead run. It has not been a significant problem for several years.

The infusion of more money and technology into the fishery problems, as suggested by the Port of Clarkston, might help find better ways of collecting and passing smolts by the dams (current research programs are already making progress in that direction), but it will not solve the problem of getting fish downstream to the dams and the collection facilities.

Additional hatchery production has limited feasibility in the Snake River basin. Hatchery sites are not easily found and the present Lower Snake River Compensation Plan hatcheries will use most of the available sites to capacity. Hatcheries do not protect wild runs and some of the present production facilities are poorly located to provide ample opportunity for sport harvest. We need habitat in which to release and fish for salmon and steelhead.

The major points involved in Asotin Dam versus anadromous fish can be summarized as follows:

Actual experience in 1977 demonstrated that a major portion of downstream migrating fish did not make it through Lower Granite pool to collection and/or passage facilities at Lower Granite Dam and were lost to the perpetuation of the run.

Snake River flow projections indicate flows such as experienced in 1977 may well be the rule rather than the exception in future years.

It is possible to adjust releases from Dworshak Reservoir to supply flows necessary to pass migrants through Lower Granite pool.

If Asotin Dam is built a pool similar to Lower Granite will be established, downstream migration will be similarly adversely affected and there will be no presently foreseeable relief available from upstream storage that in itself would not adversely affect the runs.

Available evidence conclusively demonstrates that if Asotin Dam is constructed the existing and potential anadromous fish runs in the Salmon, Imnaha and mid-Snake drainages above the Clearwater River will be essentially eliminated.

Enclosed is a statement containing some Snake River anadromous fishery economic estimates that might be of some value to you.

If you have any questions on any of this material, please do not hesitate to contact Monte Richards or John Coon of this Department.

Sincerely,

IDAHO DEPARTMENT OF FISH AND GAME

Joseph C. Greenley Director

Enclosure

Literature cited:

Coon, John C, Rudy R. Ringe, T.C. Bjornn. 1977. Abundance, growth, distribution and movements of white sturgeon in the mid-Snake River. Research Tech.Comp. Report, Proj. B-026-IDA. Idaho Water Resources Research Institute, University of Idaho, Moscow, ID.

Haynes, James M., Robert H. Gray, Jerry C. Montgomery. 1978. Seasonal movements of white sturgeon (Acipenser transmontanus) in the mid-Columbia River. Trans.

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- Tri-State Steelheaders, Inc. 1970. Summary report of the 1969 steelhead fishing method study, Lake Sacajawea, Washington. Walla Walla District, Corps of Engineers







DEPARTMENT OF FISH AND GAME 600 SO, WALNUT ST. - P. O. BOX 25 BOISE, IDAHO 83707

STATEMENT OF JOSEPH C. GREENLEY, DIRECTOR, IDAHO DEPARTMENT OF FISH AND GAME, CONCERNING THE PACIFIC NORTHWEST ELECTRIC POWER, PLANNING AND CONSERVATION ACT, SUBMITTED FOR THE RECORD TO THE HOUSE OF REPRESENTATIVES' SUBCOMMITTEE ON ENERGY AND POWER OF THE COMMITTEE ON INTERSTATE AND FOREIGN COMMERCE, BOISE, IDAHO, DECEMBER 14, 1978.

The Idaho Department of Fish and Game appreciates this opportunity to present our views on the proposed Pacific Northwest Electric Power Planning and Conservation Act. Our Department's responsibilities, and consequently our concerns, involve the anadromous fish resources of Idaho that could be impacted by the proposed legislation.

Salmon and steelhead fishing in Idaho has suffered greatly during the past 20 years, primarily as a result of the construction and operation of hydroelectric projects in the Lower Snake and Columbia Rivers. During the late 1950's the sport harvest of these fish in Idaho averaged 42,000 fish annually. Since 1964, fishing for either salmon or steelhead has not been possible because of reduced runs in three different years. In 1977 (the first salmon harvest since 1974) the total Idaho salmon and steelhead sport catch amounted to an estimated 16,500 fish.

Even at these reduced levels the short anadromous fishing seasons that have been possible attract more angler effort than the combined, much longer, total season effort expended by anglers for harvesting resident salmon and trout on some of the most widely known and heavily fished waters in the state. A study conducted by the University of Idaho estimates that 8.7 percent of the total fisherman days in Idaho during 1968 were spent fishing for salmon and steelhead.

The economic contribution of Idaho's anadromous fish is also significant. According to the 1968 study, salmon and steelhead fishing accounted for 19.2 percent of all angler expenditures in Idaho during that year. Based on more recent studies it is estimated that during the 1977 season, anadromous sport fishermen in Idaho spent approximately 1.5 million dollars in pursuit of their sport.

A study based on 1965 and 1967 runs estimated the net downriver and Idaho commercial and sport value of anadromous fish produced in the Salmon River drainage to be 4.5 million dollars. Updated to present-day values the figure would be in the vicinity of six million dollars. If applied to past or potential future run sizes instead of the reduced 1965 and 1967 runs this value would be greatly increased.

Potential future economic benefits are impressive. Annual, local, state and regional, 1976 benefits from the Corps of Engineers Lower Snake River Compensation Plan were estimated at over 11 million dollars with a benefit:cost ratio of 2.11:1. Projected to 1983 these annual benefits will have increased to an estimated 40 million dollars, with the projected benefit:cost ratio reaching approximately 5:1. The Lower Snake River Compensation Plan, which is just now being implemented, is a hatchery program designed to replace salmon and steelhead lost as a result of construction of the lower Snake River hydropower dams. This loss amounted to an estimated 48 percent of the runs. Replacement is based on pre-project run sizes. It is readily apparent that if the remaining 52 percent of the wild runs could be restored to pre-project levels, annual benefits from Snake River anadromous fish could exceed 80 million dollars.

Nutrient-poor streams of the Idaho batholith are incapable of producing significant harvests of quality-sized resident salmonids. They can, however, provide the spawning habitat for adults and the rearing areas for juvenile salmon and steelhead prior to their departure to the ocean. This well-evolved system, which utilizes the vast food resources of the Pacific Ocean, allows Idaho streams to produce and Idaho fishermen to harvest many times the quality and quantity of fish that could be achieved by resident fish populations alone. The vital connecting links necessary to make this ideal system work are the lower Snake and Columbia Rivers. Unfortunately, the lower Snake and Columbia also produce a significant portion of the hydropower being addressed in HR-13931.

Conflicts between hydropower production and anadromous fish passage have been apparent for many years. Millions of dollars have been spent in an attempt to resolve these conflicts. As of 1975, approximately 52 million dollars in fish passage construction and research had been expended by the Corps of Engineers at the Lower Snake project alone.

These expenditures have not, to date, been in vain. Against tremendous odds, they have prevented the total extinction of the Snake River anadromous fish runs, although the continued existence of certain segments of these runs hangs precariously in the balance. They have at last provided the technology and know-how to solve the major fish passage problems that have over the years decimated the anadromous fish runs. A number of interrelated fish passage programs whose combined results could return these runs to pre-dam levels have been developed and are currently in varying stages of implementation.

No one of the above-mentioned programs can achieve the desired results on its own. They must be fully implemented as a package. A major and indispensible part of this package involves the program to provide adequate flows for anadromous fish downstream and upstream fish passage past hydroelectric projects in the lower Snake and Columbia Rivers.

Criteria and procedures to effectively implement this fish flow program have been developed and are currently being refined. The initial application of the program in the low water year of 1977 prevented the possible extinction of certain segments of the anadromous fish runs. Water used for fish flows in 1977 was the absolute minimum required to prevent the annihilation of juvenile salmon and steelhead emigrating out of Idaho waters. There were still disastrous mortalities which are reflected in reduced runs returning in 1978 and which will be further apparent in the 1979 returning runs. Greater amounts of water will be necessary in future average and below-average runoff years to supply harvestable runs of fish into Idaho. Unfortunately, in the relatively good water year of 1978, the program again was limited to providing flows that would only maintain bare survival levels. Necessary flows that would have produced future harvestable levels of fish were not furnished. The justification for not furnishing these necessary flows was that fish flows could only be provided up to the point that they did not interfere with the maximum production of hydropower.

This brings us to our specific concern, and it is a great concern, with the proposed Pacific Northwest Electric Power Planning and Conservation Act. If, by intent or by future interpretation, the Act as finally adopted should direct the maximization of hydropower production in the lower Snake and Columbia Rivers without consideration for the anadromous fishery resources, it would permanently establish the currently existing philosophy concerning fish flows and effectively prevent the future maintenance of salmon and steelhead runs beyond anything but mere survival levels.

Runs maintained at survival levels would preclude future harvests and attendant recreational, aesthetic and cultural benefits, result in extinction of certain run segments, largely negate the millions of dollars of past fish passage expenditures and eliminate the potential millions of dollars of economic benefits that could be obtained if the anadromous fish runs were returned to a semblance of their pre-dam numbers.

Consideration of salmon and steelhead in hydropower production will necessitate tradeoffs of some power benefits for fishery benefits. The exact dollar amounts of these tradeoffs cannot be accurately determined at this point in time. To put them in perspective, however, the energy saved by the rather modest regionwide voluntary conservation program during 1977 would free enough water to provide more than optimum fish flows at lower Snake and Columbia River hydropower dams.

It is our conviction that these tradeoffs should be made. We believe our conviction would be shared by a majority of the citizens of the Pacific Northwest, who are also hydropower consumers, if the facts and consequences involved were clearly spelled out and available to them.

While regional energy legislation could pose a threat to maintaining harvestable runs of salmon and steelhead, it could also be a vehicle for insuring that these runs are maintained at harvestable levels into the foreseeable future. Such legislation that embraces a regional approach to power production and long-term as well as short-term considerations could supply the perspective, direction and the mechanics for arriving at least-cost methods of maintaining optimum fish flows without unduly impacting hydropower benefits.

The Idaho Department of Fish and Game respectfully urges that the Pacific Northwest Electric Power Planning and Conservation Act, as finally adopted, contain language that would direct the consideration of anadromous fish in the production of hydropower in the lower Snake and Columbia Rivers. Suggested revisions and additions to HR-13931 as presently drafted that would accomplish this aim are attached to this statement. Page 4

Once again, we wish to express our gratitude for the opportunity to present our views on this important legislation, which could well decide the fate of Idaho's salmon and steelhead resources.

Juseph C. Sveenley Joseph C. Greenley, Director Idaho Department of Fish and Game

RECOMMENDED REVISIONS TO HR-13931

Page 2, line 6, after "ratepayers" add:

fishery agencies

Page 2, 1ine 15 add:

(d) The Columbia River Basin supports fish and wildlife resources including anadromous fish which make a vital contribution to our national economy. The federal government has a substantial commitment to maintaining these resources and fish and wildlife conservation shall receive equal consideration with the development of regional plans and programs related to energy conservation, renewable resources, and other generating resources and orderly planning of the Federal Columbia River Power System

Page 6, line 9, after the "Bonnevile Utilities Council" add:

National Marine Fisheries Service, the U.S. Fish and Wildlife Service, and the fish and wildlife agencies of Washington, Oregon, Idaho and Montana.

Page 6, line 14, after "additions," add:

provisions for the maintenance and enhancement of the fish and wildlife resources, including anadromous fish.

Page 7, line 4, after "Councils" add:

, state and federal fish and wildlife agencies

Page 7, line 5, after "as provided in this section" add:

This provision shall be consistent with practices best adapted to develop, conserve, and utilize in the public interest the water resources of the Region.

Page 7, line 14, after "requirements" add:

without jeopardizing the maintenance and enhancement of fish and wildlife resources of the Region.

Page 8, line 22, after "power system" add:

provided the maintenance and enhancement of fish and wildlife resources of the Region will not be jeopardized.