

DRAFT

July 19, 2005

Colonel Debra Lewis
US Army Corps of Engineers
PO Box 3755
Seattle WA 98124-3755

Dear Colonel Lewis:

In the Rufus Woods sub-basin, the US Army Corps of Engineers (USACE) has been administering annual contracts with the Colville Confederated Tribes (CCT) to address wildlife mitigation for the ten-foot pool rise from Chief Joseph Dam, Bridgeport, Washington. The protocols and work are conducted under the ACOE Design Memorandum 52. The synopsis reads as follows.

This Design Memorandum (DM 52) presents a plan for preserving habitat for endangered species and for mitigating wildlife losses caused by increasing the elevation of Rufus Woods Lake an additional 10 feet. Recommended mitigation methods include constructing domestic livestock exclusion fences in selected areas, installing irrigation systems and planting desirable species of shrubs and trees to increase carrying capacity of habitat, constructing and installing goose nest structures and raptor poles in strategic locations, constructing goose islands and goose brooding pastures, and omitting reservoir perimeter area cleaning. In addition, this plan includes a 5-year study of mule deer populations, including their movements and habitat use. The Bald eagle, a threatened species, also was considered in this plan and will benefit from its implementation. This plan intends only to maintain the "status quo" in wintering Bald eagle use and is not intended as enhancement.

This year the USACE is re-evaluating DM 52. The CCT and Washington Department of Fish and Wildlife (WDFW) have programmatic concerns of DM 52 and would like to consider changes in the management of these sites along Rufus Woods Lake that are more in line with sub-basin planning, current wildlife mitigation efforts using BPA funding, and The Colville Tribes Integrated Resource Management Plan. The Rufus Woods sub-basin plan, compiled by experts and the general public within the Intermountain Province, addresses mitigation from hydropower project effects with the Northwest Power Conservation Council's (NPCC) guidance under the Power Act.

The CCT Fish and Wildlife Department views DM 52 as out of date with current wildlife management practices. The managers of CBFWA agree with the CCT and WDFW and wish to make several points regarding an updated version of DM 52.

1. The soils on the selected sites for mitigation for the most part are not suitable for riparian restoration without irrigation. Irrigation was intended to be used to establish new vegetation rather than support these areas forever. In their

present state, these sites are irrigated equivalent to 30 inches of annual precipitation.

2. The cost of pumping water out of the Columbia River to keep non-native species alive is not cost effective. The irrigation system in place is outdated and expensive to operate. Some parts have to be machined because they are no longer available to purchase.
3. The USACE contracts with the CCT and WDFW to mow growing vegetation to a six-inch height on site so the water cannons can be effective in watering the vegetation. If for some reason the water is shut off most of the riparian dependant vegetation would die and noxious weeds would take over.
4. In most cases, these sites are small bands along the lake more suited for upland shrub-steppe/ponderosa pine habitat types. This vegetation would be more stable and less costly than current species. Years ago Russian olive was used to plant on sites for wildlife; today this species is almost considered a noxious weed and is being removed in favor of pine and other native species. Other species selected and growing on these sites are no longer desirable or non-native such as Siberian pea, Himalayan blackberry, etc.
5. Many of the mitigation sites lie within the exterior boundary of the Colville Reservation. When DM 52 was developed, the CCT was not in a position to manage lands for mitigation. However, now the CCT Fish and Wildlife Department is fully capable of managing the sites along with other lands in the Tribes Mitigation Program.

There are unresolved issues with the USACE concerning these mitigation sites. The USACE has been managing these areas for 25 years. The sites are fairly small in area and yet they spend thousands of dollars each year on chemical weed control measures. As a land manager, weed control is accomplished on small sites by removing the existing vegetation and planting something in its place and maintaining the new vegetation over time. Large areas can be controlled by the use of bio-agents for selected noxious weeds and removing seed sources over time. Noxious weeds love disturbed sites and the USACE sites have been stable for a number of years. So why is there a problem with weed control? Wouldn't it make more sense to adopt an integrated weed control program like the CCT institutes and eliminate or control noxious weeds on these sites? We feel that the USACE has failed in its effort to mitigate for the ten-foot pool rise by artificially creating a pseudo-riparian habitat that exists only if watered. Species composition is non-native and creates the need for constant care and attention. Watering vegetation so that it has to be pruned is a waste of time and money. In addition the water is pumped from the Columbia River on site using antiquated equipment and then drains back into the river (most sites are less than 10 feet above the rivers edge). If chemicals are used to control weeds then those chemicals are leached back into the river and could impact fish and wildlife species as well as those that consume them.

The ISRP identified concerns regarding the use of ratepayer funds to maintain these mitigation sites under the current DM 52. The entire region is moving towards a more ecosystem based approach and I hope the USACE will be a partner and contribute towards species and habitat restoration efforts. The Colville Tribes

Mitigation Program is addressing the losses from Grand Coulee and Chief Joseph hydropower projects and could easily mitigate riparian wildlife losses on Tribal riparian areas with funding and WDFW could do likewise to meet the USACE obligation for the ten-foot pool rise. The irrigated sites could be converted back to shrub-steppe/ponderosa pine and eliminate the need for irrigation on the sites that won't support planted riparian vegetation. The continued costs to pump water out of the Columbia, maintain antiquated equipment, and perform site maintenance could then be used on Tribal sites for maintaining habitat values to offset ten-foot pool rise losses.

The BPA tracks funds used to mitigate hydropower losses and the USACE should reveal the ten-foot pool rise mitigation expenditures to-date.

Sincerely,

Dick Stone
Chair, Wildlife Committee