2000001054



Mission Statement:

"To advocate, educate and assist people in responsible land management and agricultural practices that conserve and improve air, soil and water quality and fish and wildlife habitat for present and future generations."

To:

Northwest Power and Conservation Council

851 SW 6th Ave, Ste 1100

Portland, Oregon 97204-1348

From:

Asotin County Conservation District (ACCD)

Re:

Request for Comments on Project 199401805

Date:

July 11, 2006

To Whom It May Concern:

The intent of this letter is to provide responses, as requested, to the ISRP Comments of the FY07-09 Project Proposal 199401805 – Continued Implementation of Prioritized Asotin Creek Watershed Habitat Projects. We have been working with Council Staff and Bonneville Power Administration for the past 12 years on complex fish habitat issues throughout Asotin County, especially in the Asotin Creek watershed. We have reviewed the ISRP comments to our proposal and below are our responses to the comments.

The reviewer(s) state the problem the proposal attempts to address is not really defined. We referenced the Asotin Subbasin Plan and talked about the factors limiting salmonids. Additionally, we spoke of the restoration and protection projects completed to date with the multiple funding sources listed in our application. Since we did a good job of targeting fish populations and the justification for addressing the limiting factors is a part of the Subbasin Plan. Regional Recovery Plan, Limiting Factors Report and Draft Watershed Plan, it was our oversight in giving sufficient background information on limiting factors. However, limiting factors were identified in the Asotin Creek Model Watershed Plan (1995) (ACMWP) and were the basis for initial funding of this now ongoing project. This project has been in place since 1994 and to reiterate the facts in the ACMWP would be a waste of the ISRP's time. This is a watershed proposal that has gained sufficient support from local technical and permitting agencies as well as local citizens and landowners. We utilized EDT to give us priority stream reaches and species affected by factors limiting production. We feel we gave accurate information and details of the history of the limiting factors were referenced to the Asotin Subbasin Plan.

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The reviewer(s) stated that the strategies were not justified in the Proposal. The justification, cause and effect, technical and scientific background are all in the Asotin Subbasin Plan, and we referenced this and listed the page numbers in this section of the proposal. The space in the proposal itself was limited but we utilized the space available to address the fish species most actively targeted for restoration with maps showing their current distribution throughout the watershed and to showcase projects that have been completed in priority reaches.

The human-generated causes that exist and the underlying problems can be summarized as a low elevation watershed in Southeastern Washington with low rainfall (six - ten inches at the mouth and twenty - thirty inches in the headwaters) coupled with historic grazing, farming, and ranching practices as well as logging and roads that resulted in riparian and upland degradation. Having a short growing season for crops and low rainfall has resulted in small numbers of alternative crops with two or three-year rotations typically including one year of summer fallow to enhance soil moisture for the next growing season. The practice of summer fallowing increases erosion because the soil is left with no vegetation to improve its moisture capturing ability. Direct seeding of crop acreage improves moisture infiltration and retains it for the next growing season, thereby eliminating the need for summer fallow. Direct seeding leaves residue on the field and can reduce erosion by 95% (according to NRCS's RUSLE2 program average erosion rates in Asotin County are 4 tons to the acre per year, direct seeding can reduce to 0.4 tons per acre per year). Riparian areas were historically grazed and winter-feeding and calving operations were located near flowing water in canyons along Asotin Creek. We have worked with local landowners to install alternative water developments, move feedlots and fence riparian areas for long-term protection with the CREP Program and funding from the Fish and Wildlife Program.

The reviewer(s) stated that the proposal doesn't deal with restoration of sinuosity as a method to reduce cobble embeddedness. We have completed three meander reconstruction projects and have documented successes and the minimal operation and maintenance necessary. This proposal does not include instream work due to the extensive engineering and cost associated with this type of work. We feel that the strategies identified under Objective Upper Asotin 1.1 will also achieve this. These strategies include improve function of riparian buffers; improve upland agricultural practices to reduce sediment delivery to streams; restore perennial vegetation in uplands which will replace annual cropping and be less intensive management; and improve streambank stability through riparian planting and fencing projects. By improving riparian function, the stream system will stabilize and the floodplain connectivity and sinuosity will be achieved. Reducing sediment delivered to the stream from the uplands will also help reduce fines in the stream and improve sorting of the gravels for better spawning habitat. We feel these strategies better meet the needs of the watershed rather than further instream restoration and will be a more efficient use of BPA funds. Although identified in the Subbasin Plan, it was not addressed in this proposal due in large part to previous ISRP comments on instream habitat work and the ability to get permits to complete these types of projects. In the future, it is something that will be addressed if an area is identified that needs more intensive restoration.

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The reviewer(s) state that the underpinning information to support the selection of tasks was not provided. However, the tasks are taken directly from the Asotin Subbasin Plan and the detail is referenced to the Plan. It was our understanding that the ISRP would have access to the Subbasin Plans and referencing this information would be sufficient. In the budget section we break down the cost of each task and even show that these tasks were a result of the EDT analysis that was completed on the Asotin. We have completed most of the previous projects in high priority EDT areas and we continue to expand and extend previous investments.

The monitoring and evaluation section is reliant on technical help from WDFW, USFS and Department of Ecology. This proposal provides on-going monitoring that has been funded the past six years. In the future, we will have information from the adult and juvenile trap on Asotin and will better understand the adult to juvenile ratios, the number of adults per redd and the relationships of spawners to previous instream structures. WDFW has only been operating the adult and juvenile trapping with BPA Project #200205300 for the past three years and it is independent from this proposal but provides valuable information for future monitoring needs. We continue to work with WDFW to monitor previous instream habitat structures and fish utilization. Additionally, understanding the wild steelhead populations and their spawning habitat is important to the Asotin Creek steelhead MSA (Major Spawning Aggregation).

Determining biological results from this project is reliant on WDFW fisheries biologists and will include habitat utilization by spawning steelhead, collecting habitat and temperature information while doing spawning ground and juvenile density surveys, and the newly developed Assess Salmonids in Asotin Creek Watershed Proposal. We have been completing instream, riparian, and upland projects to restore prioritized habitat for ESA listed species since 1994. We have planted trees to improve riparian habitat, increased riparian buffer widths through fencing, and enrolled acres in direct seed programs. But, until the trees are fully developed, the buffers are revegetated and established, and the direct seed programs are completed, we don't have any more information than we have presented. We believe that with the adult and juvenile traps we are going to be able to answer the biological questions in the near future, but until that time we will rely on photo documentation of restoration projects. Maps showing the areas that have been protected and restored, a comprehensive database of habitat projects completed, and annual reports are currently our best forms of identifying project accomplishments.

We appreciate the positive comments on this proposal and look forward to working with Council staff and BPA to finalize this project for implementation.

Sincerely,

Megan Stewart

District Office Manager

Cheryl Sonnen

Resource Technician