

From: dwjnrc@____
Sent: Friday, June 26, 2009 2:07 PM
To: Palensky, Lynn
Subject: Re: Comment on NWCouncil funding

Email Comment on ISRP Report, ISRP 2009-17 and Staff Memorandum

I recently read of the involvement of NWPC in funding WDFW activities on the Asotin Wildlife Area (included with my comments below).

Council Moves Forward On Wildlife Project Recommendations Under F&W Program

The stage is set for the Northwest Power and Conservation Council to complete next month the first, relatively small, leg of its newly devised process for evaluating which projects should be funded through its Columbia River Basin Fish and Wildlife Program.

The Council's Fish and Wildlife Committee on Wednesday voted unanimously (3-0 with one member absent) to endorse staff recommendations that 34 of 36 submitted wildlife projects be funded for the next five fiscal years. **The full Council will consider adoption of the recommendations when it meets July 14-16 in Portland.**

The average annual budget for those projects would be \$13.9 million, \$1.8 million more than \$12.1 million fiscal 2010 start-of-year budget suggested by the Bonneville Power Administration. The federal power marketing agency makes final funding decisions and develops contracts for the work. **Revenues from wholesale power customers fund the program as mitigation for impacts on fish and wildlife from the construction and operation of the Columbia-Snake river power system. [So why is it funding the destruction of habitat with the Washington Cattlemen's Assoc/WDFW "pilot grazing" projects?]**

Included is WDFW receiving \$150,000 for Smoothing Iron **[Asotin Wildlife Area; "wild steelhead refuge"]** for various activities like fencing to keep livestock out of the management area and revegetation projects. **[WDFW has apparently once more failed to note that they are fencing to keep livestock in, and little revegetation or weed control projects are actually happening on the ground.]**

"Just talked to the state attorney: -Asotin cows were pulled off last week after standards were met. Done for the season."

On the ground it appeared that cattle grazing standards had been well exceeded, beyond the reported "met".

I hope we can rededicate the Pintler and Smoothing Iron units of the Asotin Wildlife area to fish and wildlife populations for 2010.

The Asotin Wildlife Area lands were purchased with BPA mitigation funding as long ago as 1990. Those lands were allowed to recover from historic cattle grazing until 2006 in conjunction with the expenditure of over \$2 million in public funding of stream restoration in the Asotin Creek watershed.

In 2006 a Washington Cattlemen's Association/Washington Department of Fish and Wildlife (WCA/WDFW) MOU established a "pilot grazing" project on that area. It was to be a three year project to demonstrate the benefits of cattle grazing on fish and wildlife habitat. It was initiated on Pintler Creek in 2006 and on Smoothing Iron Ridge (S.Fk. Asotin Creek) in 2007. In 2008 with no evidence of any beneficial effects and with abundant examples of habitat degradation the WCA/WDFW collaboration decided to extend the program for five years. Examples of degradation were not subtle with springs destroyed, forage overgrazed, and streams receiving large amounts of sediment. One major soil movement event from "pasture" 1 at Smoothing Iron washed out Warner's Gulch road and delivered huge amounts of sediment to the S.Fk. of Asotin Creek which contains three species of ESA-listed salmonids. Another is the massive invasion of scotch thistle into the Smoothing Iron.

With well more than a million dollars in public funds already devoted to this project an inspection on May 31, 2009 found that fence posts and salt blocks have been placed adjacent to Smoothing Iron "pasture" 6 with the apparent plans to dedicate additional native vegetation, now available only to the resident elk herd, to cattle.

This wasteful, economically and environmentally, project should be stopped. It should receive no additional public funding. NWPCC and BPA should in no way be involved in this project.

It is my understanding that Dr. Linda Hardesty of Washington State University is a member of the NWPCCC Scientific Review Committee. She should not be on this committee since her professional interests are livestock production not fish and wildlife or other environmental conservation or restoration issues. In 2008 Dr. Hardesty received a five year grant for \$428,802 to monitor the WCA/WDFW "pilot grazing" projects. Dr. Hardesty recently pursued a USDA grant for \$621,000 for "Evaluating the Impacts of Conservation Practices on Watershed Health in a Salmon-Bearing Rangeland Watershed: Asotin Creek, Washington".

This grant did not mention her involvement with the "pilot grazing" project and it does not explore the impact of the "pilot grazing" program, however she has used it to "leverage the Department's investment in the monitoring project" as shown below.

From: Linda Hardesty [lhargest@wsu.edu] Sent: Monday, June 02, 2008 10:04 AM To: John Pierce Subject: letter of support Importance: High

My colleagues and I are currently writing the proposal I told you about when I saw you in Pullman. The program is the USDA Conservation Effects Assessment program. The practices the Department is implementing on your lands such as rotational grazing and fencing and water development are all considered conservation practices. **This would greatly leverage the Department's investment in the monitoring project and I hope you would be able to provide us a letter of support on that basis.** If you are not the person I should contact, please let me know who is. The bad news is that our deadline for the proposal is June 9, so there is not much time. I apologize for that.

From: Linda Hardesty
Sent: Wednesday, September 03, 2008 9:54 AM
To: Pierce, John [DFW]; Smith, Courtney - Clarkston, WA
Subject: CEAP proposal successful

Good news today! Our proposal **to study the aggregate effects of past conservation practices in Asotin Cr.** has been selected for funding.

I'm grateful for your support of the proposal and look forward to working with you as the project progresses. Asotin Cr. offers a unique **opportunity to study these processes in a heavily used watershed that supports anadromous fish. Being able to cooperate with other current studies in the watershed** will make it one of the best studied watersheds in the region and should offer many insights to assist future management efforts.

The grant title and objectives are (**approximately**):

Evaluating the impacts of [the word "past" is not used here, but is in the proposal and the following note.] conservation practices on watershed health in salmon-bearing rangeland watersheds: Asotin Cr. Washington, as a case-study.

1. Use literature to develop site-specific criteria of watershed health for Asotin Creek, based upon geologic and climate criteria. Suitability to enhance or maintain native salmonid fish runs will be a key component of watershed health. Ability to support desired human uses will also be included.
2. **Synthesize** necessary **past** data and models to improve Asotin Creek watershed health. Create geo-referenced history of **past management** of this watershed since settlement, including **past projects** aimed at stream channel, water quality, fisheries, cropland and upland habitat improvements. This history would include social and economic factors driving use of the watershed. **Past climate data** will be also analyzed to determine climate change within Asotin Creek.
3. **Select the sub-watershed most suited to detailed analysis** based on past and planned rangeland conservation practices, and availability of water quality, flow and fisheries data. [The selection of Pintler Creek is not one of the areas considered for analysis.]
4. Adapt existing model(s) (i.e., WEPP and CLIGEN/PRISM) for the study watershed and calibrate and parameterize the model to evaluate the physical parameters of watershed health, **using synthesized past data**. The adapted model(s) will be used to develop management practices to cope with future climate change in Asotin Creek.
5. Work with stakeholders to understand perceptions of land uses, conservation practices, and watershed health from both social and economic perspectives.

6. Develop an optimal set and sequence of **grazing land conservation practices** to achieve watershed health in Asotin Creek. [Pintler Creek “pilot grazing” is within Asotin Wildlife Area; it is not “grazing land”.]

Following is another professional assessment of this project by a retired NRCS expert:

COMMENTS ON THE PROJECT “EVALUATING THE IMPACTS OF CONSERVATION PRACTICES ON WATERSHED HEALTH IN A SALMON-BEARING RANGELAND WATERSHED: ASOTIN, WASHINGTON” Don Clarke, Sedimentation Geologist May 9, 2009

This project seems to be founded on the premise that it is essential that domestic livestock grazing occurs on all grasslands and that grazing is a conservation practice. That concept is initially flawed. Given that the use of a wildlife area is at issue and that protection of fish and wildlife habitat is of primary concern, the most appropriate conservation practice is “no domestic grazing”.

The document states that the project will contribute to restoration and conservation of watershed health, evaluate existing and proposed conservation practices’ influence on runoff, erosion, sediment delivery and stream temperature and contribute to scientific understanding of grazing land management. Considering these anticipated results, it is surprising that the potential conservation practices to be evaluated are not given. The reader cannot foresee how scientific understanding can occur in the absence of possible conservation practices.

The Asotin Creek Watershed is severely impaired on the uplands, in riparian areas and within stream channels. Yet, this document fails to convey the severity of conditions which have resulted from overgrazing (e.g. poor vegetal cover, hoof sheared soils and accelerated erosion and sediment yield).

The loss of riparian values from flooding is expressed on page 3, but there is failure to express the extreme influence that cattle grazing has had on the magnitude of flooding. Also, the declining rangeland condition is mentioned but with minimal enlightenment on how cattle grazing has impacted this decline.

It appears that Figure 2 shows that no impaired water bodies occur on the pilot grazing project area. This is misleading.

The locations of many of water and channel monitoring data collection, as shown on Table 1, are not of value for indications on the pilot grazing project areas. A set of monitoring sites within the pilot grazing project area is needed. Monitoring on upper, mid, and lower reaches within the pilot grazing area in all seasons is needed to adequately assess the impacts of grazing on the aquatic ecosystem.

The use of synthesized past data is discussed in objective 4. The stated purpose is to arrive at parameter values for use in the WEPP model. Because synthesized data are considered necessary, it follows that past data to meet WEPP requirements are not available. In order to have reliable comparisons of watershed conditions at different time frames, all data (past and

present) must have been collected under the same protocols. Comparing WEPP outputs using synthesized data with outputs using on-site data is highly questionable at best and totally unreliable at worst. Also, it is stated that WEPP is to be re-parameterized until it can predict the past observed data reasonably. While this is an interesting activity, assurance that the appropriate parameters have been adjusted is essential. The desired results can be achieved by adjusting the wrong parameter. The developers of the WEPP model at the ARS should be consulted regarding use and misuse of the model.

Grazing is detrimental to nearly all of the objectives shown for the Lower George Creek priority restoration geographic area (page 10). For example, grazing increases fine sediment load, decreases riparian function, increases water temperature, increases bed scour and decreases summer flow.

The lack of confidence in existing data and the potential for using “best substitute data”, as expressed on page 17, are disturbing. Does “existing data” include recently collected data or data yet to be collected? Are readers to make the interpretation that synthesized data are more reliable than recently collected on-site data? What would be the source of “best substitute data”?

First it was disappointing that such a study was being conducted. Then, it was another jolt to learn that USDA is funding it. Now, the price is a knockout blow.