APPENDIX AD2

Comments/Responses to the Walla Walla Subbasin Plan

The following comments from government agencies, resource organizations, and the public were received after the Walla Walla Subbasin Plan was sent to the Northwest Power and Conservation Council (NPCC) on May 28, 2004. The comments listed below have been summarized from the original documents sent to the NPCC.

Under each comment is the SPT response in ***bold italics***. Responses fall under one of the following general categories:

1. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see page X).***
2. ***This comment has been addressed in the Addendum Package (see page X).***
3. ***This comment was not incorporated in the subbasin planning process that was completed in May 2004 because (reason)…***
4. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
5. ***This comment will be incorporated in the November 2004 version of the Walla Walla Subbasin Plan.***
6. ***The subbasin planners acknowledge that this issue needs to be addressed by the NPCC.***
7. ***Thank you for your comment. (We appreciate your input. No direct action will be taken at this time, but your comment will be part of the record).***

Confederated Tribes of the Umatilla Indian Reservation, August 12, 2004

General Comments:

- Supports subbasin planning. It has provided an opportunity to advance collective capacity to plan, implement, and evaluate project specific actions with respect to habitat needs. ***Thank you for your comment.***
- Cannot determine sufficiency of plans without better understanding how they will be used. ***The NPCC plans to amend the plans into the USFWS program used for prioritization in future project selection processes.***
- Time constraints and schedule have been inadequate for such a critical effort. Council's timeframe is inadequate for addressing shortcomings of the plans and planning process. ***The subbasin planners agree, as indicated in the Preface, pages 1 & 2.***
- Plans were done at a "strategies level" and do not include measures or project actions. Northwest Power Act requires this. ***In their review of the Walla Walla Subbasin Plan, the NPCC offered two alternatives for addressing the prioritization process. The SPT chose Alternative 2: Develop a prioritization "framework" that describes the process and considerations or criteria that will be used to identify which strategies are a priority for***

implementation when project selection processes are initiated. Projects within the Walla Walla Subbasin will be selected using this approach.

- EDT was not used consistently across subbasins in the assessments. This will limit their usefulness in the development of priorities. ***The subbasin planners acknowledge that this issue needs to be addressed by the NPCC.***
- Proprietary nature of EDT limits F&W managers' ability to further evaluate data sets. If the model is to be a long-term assessment and planning tool, F&W must have access without significant cost. ***The subbasin planners acknowledge that this issue needs to be addressed by the NPCC.***
- Biological goals and numeric objectives are often incomplete or lifted from older plans. Planning process should require co-managers to develop quantitative biological objectives. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see Table 7-3, page 143).***
- Out-of-subbasin effects (OOSE) mainstem issues not adequately addressed. ***The subbasin planners acknowledge that this issue needs to be addressed by the NPCC. The subbasin plan deals with this issue briefly in Section 2.2.2 and Appendix AD4 of the plan.***
- Artificial production was not part of EDT modeling and not well linked to the assessments. Habitat enhancement-hatchery supplementation relationship is important. ***The subbasin planners acknowledge that this issue needs to be addressed by the NPCC.***
- Standardized EDT should be developed that allows all subbasins to run comparable restoration scenarios. ***The subbasin planners acknowledge that this issue needs to be addressed by the NPCC.***

Comments specific to Walla Walla SBP:

- Problems with EDT. Input needs significant correction, updating, ground truthing, technical consensus. Process should include other agencies beside WDFW. ***This comment has been addressed in the Addendum Package (see Section 1.1 and Appendix AD1).***
- TMDL results should be incorporated in the plan and EDT model. ***This comment has been addressed in the Addendum Package (see Section 1.1 and Appendix AD1).***
- Detailed EDT scenarios need to be run with meaningful restoration actions to predict quantitative benefit outcomes (including flow enhancement). ***This comment has been addressed in the Addendum Package (see Section 1.1 and Appendix AD1).***
- Potential habitat restoration scenarios should be developed in a larger technical setting using more detailed historic data. ***This comment cannot be addressed in the current subbasin planning process but will be addressed in future revisions and additions to the plan.***
- Need better integration of AP in assessment and management plan. ***The subbasin planners acknowledge that this issue needs to be addressed by the NPCC.***
- Need to do bull trout QHA and integrate into management plan. ***This comment cannot be addressed in the current subbasin planning process but will be addressed in future revisions and additions to the plan.***

- Need to append comprehensive RM&E plan, which is anticipated to be completed within three months. ***This comment has been addressed in the Addendum Package (see Section 2.2 and Appendix AD3).***
- Section on project planning and development process would be helpful. ***This comment has been addressed in the Subbasin Plan (see Section 7.1, beginning on page 127).***
- Land acquisition as a protection/restoration measure should not be further restricted; existing constraints are sufficient. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see pages 128-129 and Appendix I).***
- Planning process should rely more heavily on the fish and habitat co-management agencies, regional scientific and policy institutions and less on external consultants. ***Thank you for your comment.***
- Future revisions of the SBP should be made in the context of parallel state and federal planning processes such as the Washington Salmon Recovery Plan and Walla Walla Bull Trout Recovery Plan. ***Thank you for your comment.***

Larry Bishop, July 5, 2004

- Concerned about how plan will be used and whether planners have considered forcing private landowners to comply with the goals of the plan. ***USFWS will use the plan to guide investments in restoration efforts; these efforts are fully voluntary.***
- How were optimum conditions for streams in the area determined? Skeptical that stream conditions in Lewis and Clark's time are known. Wonders how planners arrived at historical numbers of fish. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see Sections 3.4 and 3.5 and Appendix AD3). Historical conditions and numbers were based on the best available science and professional judgment.***
- CRP/CREP useful tool in preserving stream health, but Walla Walla County is at the limit for number of acres that may be enrolled. A locally funded CRP/CREP could help farmers because WW County has already reached the limit. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see pages 152, 155, 157, and 164).***
- Chemical buffer strips along streams are now in place and further burden agriculture. Pesticides are needed to control noxious weeds that would otherwise out-compete desirable riparian vegetation. ***Thank you for your comment.***
- Agriculture is not represented in document. Farmers may not have participated, but is concerned they will be most affected. Concerned plan will eventually be used against agriculture. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see Sections 1.2 and 1.3). Decision-makers for the subbasin planning process were Walla Walla County (WRIA 32 Planning Unit) and the Walla Walla Basin Watershed Council, both of which include representatives from agriculture. The public involvement process also included input from agricultural industry representatives.***

City of Walla Walla, August 5, 2004

1st Comment received July 19:

- Although the Mill Creek area encompasses a very small percentage (4%) of the Walla Walla SB area drainage, the surface water rights from that water body provide a majority of the potable water source for the City of Walla Walla. The City has one of the oldest established water rights on Mill Creek.
- City's review of the SBP indicates that streamflow modifications are being considered that could have significantly negative impact on municipal water supply as well as on the water supply of other municipalities.
- City currently has concerns regarding flow modifications proposed in the SBP.
- City will be requesting meetings to discuss this with the Council.

Subbasin planners met with the City of Walla Walla staff on August 2, 2004 to address the above concerns.

2nd Comment received August 5:
City agrees to the SBP with the caveat that its concerns be addressed.
General Comments:

- Plan has many 'absolute' assumptions rather than ranges of projections based on low and high scenario impacts. ***This comment will be incorporated in the November 2004 version of the Walla Walla Subbasin Plan with the addition of the following text:***

  1.1.4 Planning Limitations:
  In order to expedite and simplify analysis of this subbasin, this plan has been based on assumptions and the results of models that portray what is considered to be a reasonable future climatic and environmental scenario. Future funding and consideration of conflicting local policy issues may require additional research, modeling, and subbasin plan updates based on a range of assumptions that reflect the range of uncertainty associated with long-term weather conditions, historical fish populations, and so forth.
- Includes value-laden language. Statements should be science based. ***This comment will be incorporated in the November 2004 version of the Walla Walla Subbasin Plan.***
- "Imminent threat" is used to describe Mill Creek. Retrofitting the channel for fish passage would be quite expensive. Need to look at cost, benefit, human impact. ***This comment cannot be fully addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan. However, Section 1.3 of the Addendum Package incorporates consideration of cost benefit ratios in the project prioritization framework.***
- Interests must be balanced. General public may determine a direction without understanding the long-term impacts. ***Thank you for your comment.***

The City of Walla Walla has also recommended changes to Section 7.3.5 Aquatic Strategy Special Topics of the Walla Walla Subbasin Plan. The following changes will be incorporated into the November 2004 version of the Walla Walla Subbasin Plan:

- Add the following language to page 174 of the May 2004 version of the Walla Walla Subbasin Plan under the first paragraph in recommendation #3:
  This plan recognizes that the continued long-term success of species restoration requires long-term commitment by the "caretakers" of the subbasin in protecting environmental assets. Special consideration will be given to developing one or more solutions for improving the flood control channel through the City of Walla Walla in such a way that "recreates" the flood control channel as a public cultural asset that provides both long-term local economic/environmental support to this area while emphasizing the sensitivity and importance of the channel for fish passage. It is anticipated that such a solution will take a full complement of financial participation from federal, state, local and other entities.

- Add an additional recommendation (#6) on page 175 of the May 2004 version of the Walla Walla Subbasin Plan:
  6) In order to address the potential for restoring upstream or headwater attributes from the Walla Walla water intake to the steelhead access limit, EDT scenarios should be run (or other methods used) to establish the on-going benefits associated with the City of Walla Walla and Forest Service's continued financial and physical roles in protecting this area. This area has only limited (permitted) access. An alternative habitat scenario needs to be provided to evaluate the deleterious effects of the conversion of City-held properties within the watershed to residential land use and quantify the benefits associated with current conditions.

  Comment:
  None

- Add the following language to page 179 of the May 2004 version of the Walla Walla Subbasin Plan, under the *Approach* bulleted list:
  A catastrophic fire is possible and could result in significant negative ecological impacts/damage. This scope of this plan is limited to exploring preventative measures.

- Add the following language to page 180 of the May 2004 version of the Walla Walla Subbasin Plan after the first paragraph under Instream Flow:
  Short-term seasonal variations, including low flow or drought condition years, pose a special concern on Mill Creek. The EDT model is a steady-state model and instream flow enhancement measures will need to recognize short-term low water supply fluctuations in the hydrologic cycle and the need to meet continuing and critical out-of-stream municipal and irrigation demands.

  Long-term climatic change also has the potential to influence flow. This plan's current modeling effort has adopted a reasonably supportable set of assumptions regarding historical conditions and the interplay of environmental and physical attributes. Continuing and ongoing efforts will be needed to identify, anticipate, and reflect the range of climatic conditions and other variables that may occur in the future. It will be increasingly important to hone our understanding of any changes as important policy and funding issues come into play.

The City of Walla Walla also submitted the following comments:

- The City of Walla Walla has continuing concerns regarding the impact of the imminent threat designation of the Mill Creek Flood Control Channel on the future of municipal water supply as well as on endangered species preservation. The designation reflects a limited scope of environmental inquiry and appears inconclusive in light of the related environmental, community, and economic impacts. The City emphasizes that the Mill Creek channel is a flood control structure constructed by government entities as a safety/health measure to help alleviate the catastrophic affects of historic flooding in the City of Walla Walla and surrounding areas.

  The City strongly supports and urges those parties responsible for the design and construction of the channel, together with those agencies responsible for determining and maintaining water flows in the channel, to move forward to clarify and then address the impact of this designation. Resolution of the imminent threat identification has implied significant funding impacts which must be resolved in a timely manner for the continued economic viability of the involved communities. The opportunity for addressing habitat restoration, as well as sustaining the necessary continuing community support for this effort, requires both a funding commitment as well as the overall support of those government agencies who, collectively, were responsible for first designing and constructing the infrastructure (now identified as an "imminent threat") and who are now enforcing the federal mandate to extend protection to endangered species.
  Thank you for your comments.

- The fish passage barrier presented by Mill Creek Flood Control Channel is recognized as a high priority "imminent threat" on Mill Creek. Though recognized as a high priority, the Mill Creek scenario presents unique challenges. The City of Walla Walla recognizes that the scope of the necessary funding as well as the role and responsibility of the federal government in the design and construction of the infrastructure places it well outside the traditional funding mechanisms available to communities on a local, state, and even federal level. Given the unique federal nexus of the Flood Control Channel, the City of Walla Walla supports that funding available under the Subbasin Plan be considered to help resolve these challenges.
  This comment has been addressed in the Addendum Package (see Section 1.3).

There are also a number of detailed issues and technical corrections provided by the City. None of these comments appear to be adoptability issues. ***These comments will be incorporated to the extent possible in the November 2004 version of the Walla Walla Subbasin Plan.***

USFWS, Oregon F&W Office, August 10, 2004

- Environmental/Population Relationships Conditions: significant work needed for both aquatic and terrestrial components. Plan discusses a methodology to identify key environmental factors and correlates, but has not completed the process to identify them specifically. It does not use this information to assess the long-term viability of each

population based on habitat and condition. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***

- Limiting Factors: moderate to significant work needed for both aquatic and terrestrial components. Planners had decided not to conduct bull trout analysis because they intended to include recovery measures from Draft Bull Trout Recovery Plan, but they were not included. Should incorporate sections of Draft Recovery Plan. Terrestrial section could be improved by more clearly displaying the historic key factors, current key factors, and opportunities to correct conditions. ***This comment has been addressed in the Addendum Package (see Section 2.3 and Appendix AD4).***
- Interpretation and Synthesis: significant work needed. Provides ideas for synthesis, but does not provide detailed synthesis. Critical of hypotheses because bull trout information was not included in this section. ***This comment has been addressed in the Addendum Package (see Section 2.3 and Appendix AD4).***
- Desired Future Conditions: bull trout information omitted. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see page 171).***
- Inventory: no specific information on stream buffers, municipal or county ordinances, conservation designations or water resources protection. No gap assessment. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- Management Plan: expectations for summer flow objective are unclear. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.*** No discussion of bull trout, which needs major work. ***This comment has been addressed in the Addendum Package (see Section 2.3 and Appendix AD4).***
- Prioritization of Strategies: significant work needed regarding internal consistency of plan. Aquatic species not clearly prioritized. Terrestrial not prioritized at all. ***This comment has been addressed in the Addendum Package (see Section 1.3).***
- Consistency with CWA/ESA: significant work needed. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see page 171). Additional information will be addressed in future revisions and additions to the plan.***
- USFWS has attached the Umatilla-Walla Walla Recovery Unit of the Draft Bull Trout Recovery Plan due to the numerous references to the Recovery Plan. ***Thank you.***

USFWS, Upper Columbia Fish and Wildlife Office, August 3, 2004

- Walla Walla SBP can be strengthened to better incorporate the best available scientific information, especially regarding bull trout. ***This comment has been addressed in the Addendum Package (see Section 2.3 and Appendix AD4). Additional information will be addressed in future revisions and additions to the plan.***

- Concerned with minimal reference to, or incorporation of, portions of the Draft Bull Trout Recovery Plan. ***This comment has been addressed in the Addendum Package (see Section 2.3 and Appendix AD4).***
- Recovery Plan is in draft form and may change, but provides a wealth of scientific information on bull trout in the Walla Walla basin. ***This comment has been addressed in the Addendum Package (see Section 2.3 and Appendix AD4).***

Oregon Subbasin Planning Coordination Group, Revised August 12, 2004

- Plan is well organized, generally well written and easy to follow. ***Thank you for your comment.***
- Assessment generally provides the geographic, demographic, and environmental context for fish and wildlife resources. Easy to read, good organization and appropriate detail. ***Thank you for your comment.*** Including a brief discussion of historical events and activities that lead up to the current F&W status would be useful. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- Discussion of OOSE should be expanded to be more subbasin-specific. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- The limiting factor analyses for both aquatic and terrestrial focal species would be improved by more clearly displaying historic key factors, current key factors and opportunities. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- Draft Bull Trout Recovery Plan was not properly addressed in the plan. ***This comment has been addressed in the Addendum Package (see Section 2.3 and Appendix AD4).***
- Inventory lacks an adequate gap assessment. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- Rather than identifying biological objectives for aquatic focal species, the management plan identifies objectives for particular habitat attributes. The measure of the management plan's effectiveness should be based on the response of the focal species, not on specific objectives. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see page 129). In addition, the RM&E plan will include the monitoring of focal species' responses to the implementation of habitat projects (see Chapter 7).***
- The management plan provides a scenario to prioritize aquatic strategies as projects are proposed, but it does not sequence and prioritize them up front. Terrestrial strategies were not prioritized. ***This comment has been addressed in the Addendum Package (see Section 1.3).***
- An RM&E plan is not included. ***This comment has been addressed in the Addendum Package (see Section 2.2 and Appendix AD3).***

- Section 2.2.1. (p. 23) There is minimal info on size of subbasin related to total Columbia Basin, placement, relationship to other subbasins within the same Ecological Provinces (what do they have in common?), or distinguishing qualities (How is the WW different from all other subbasins in the Columbia Plateau Province and how is this, in turn, different from other adjacent provinces?). ***Some of this information exists in the May 2004 version of the Walla Walla Subbasin Plan (see Tables 4-6 and 4-7). Additional information on inter-subbasin comparisons, ranging from habitat type acres to protection status, that were not incorporated into the final Walla Walla Subbasin Plan, may be found in the Walla Walla Subbasin Assessment and/or management plan sections drafted by WDFW.***
- Identify important environmental factors (KEFs) and correlates (KECs) that are particularly important for the species' survival and determine the characteristics that constitute optimal conditions for species health? Assess the environment's ability to provide these conditions by comparing the optimal conditions to current and reference conditions? Assess the long-term viability of each population based on habitat availability and condition? ***This information may be found in Appendix F of the May 2004 version of the Walla Walla Subbasin Plan.***
- Section 4.3.2 describes priority habitats, protection status, and briefly discusses impacts or causes of the decline of each habitat type….. Key factors affecting focal habitats are described in the subbasin plan's text, but are difficult to find. This section can be improved by more clearly displaying the historic key factors, current key factors, and opportunities to correct conditions. ***This comment has been addressed in the Addendum Package (see Section 1.4).***
- Desired Future Conditions – Terrestrial: Identify a theoretical reference condition that would ensure long-term sustainability for the focal species/population or other species or guilds of species reliant on the focal habitats? A desired future condition was not provided. ***This comment has been addressed in the Addendum Package (see Section 1.4 and refer to the focal habitat summary templates).***
- Section 7.4. There is no similar discussion of refugia, or habitat limitations for terrestrial species. ***Although not specifically listed, all public, private, and tribal lands designated medium and high protection status could be considered to provide refugia for most wildlife species for at least a portion of the year. Habitat protection status has been summarized in the subbasin plan (see Tables 4-5, 4-8, 4-9, and 4-10). Factors affecting habitat containing focal species have been addressed in Section 7.4.1 of the May 2004 version of the Walla Walla Subbasin Plan and in the Addendum Package (see Section 1.4 and refer to the focal habitat summary templates).***
- Terrestrial: The plan provides very general objectives. The plan does not provide a clear logic path from focal species needs to priority habitat objectives. There are no numerical or population goals for focal species or for habitat quantities. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see page 194). Linkages have been clarified in the Addendum Package (see Section 1.4).***
- Prioritization. Does the Strategies Section describe a proposed sequence and prioritization of strategies? The terrestrial strategies were not prioritized. And there is not an in-depth discussion of other alternative strategies for aquatic or terrestrial species. ***This comment has been addressed in the Addendum Package (see Section 1.3)***

Oregon State Department of Fish and Wildlife, August 12, 2004

Comments specific to the Walla Walla SBP:

- SB Overview: more detail needed. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- Focal Species: identifies steelhead/rainbow trout, but never discusses resident form. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- OOSE: does not explore significantly. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan. The subbasin planners also acknowledge that this issue needs to be addressed by the NPCC.***
- Limiting Factors: does not explore what the "true limiting factors are for the aquatic focal species." ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan. The current process is not addressing limiting factors. What is in the plan is based on the best available information at the time the plan was written. Future revision of the plans could explore other potential limiting factors for aquatic species.***
- Planners made good attempt to begin process of integrating the aquatic and terrestrial habitat information into a more complete assessment of the region. ***Thank you for your comment.***
- Desired future conditions should include a goal for wetland restoration enhancement. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- Inventory: A couple of partners in Oregon were missing. Water resources protections were not adequately dealt with and should be included. ***This comment will be incorporated in the November 2004 version of the Walla Walla Subbasin Plan.***
- Discussions of reintroduction of spring Chinook should be framed in an experimental sense, including adequate monitoring and evaluation. ***This comment has been noted in the subbasin plan (page 29) and addressed in the Addendum Package (see Appendix AD5).***
- Planners were able to make greater use of EDT information to help develop working hypotheses and objectives for the aquatic habitats. The objectives for both aquatic and terrestrial species are well planned and the list of strategies is very extensive. Number of strategies is too long and without prioritization is difficult to sort out. ***This comment has been addressed in the Addendum Package (see Section 1.3).***
- If recommendations regarding the need to address wetlands in more depth in this SBP are followed, then the plan will be internally consistent and able to fulfill its objectives. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- Plan is consistent with CWA/TMDLs, but only minimally integrates TMDLs. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***

- RM&E plan is not included. There are two draft plans that are quite different. This needs to be resolved and a RM&E plan included in the final SBP. ***This comment has been addressed in the Addendum Package (see Section 2.2 and Appendix AD3).***
- Several other editorial, fact checking, technical suggestions. ***These comments will be incorporated to the extent possible in the November 2004 version of the Walla Walla Subbasin Plan.***

Walla Walla Watershed Council, August 12, 2004

- Not enough time to address complexities, ESA pressures, bi-state watershed. Many groups were involved in the development of this plan, and there was insufficient time for review and feedback. ***The subbasin planners agree, as indicated in the Preface, pages 1 & 2.***
- Walla Walla was last in line to be completed by the contractor team (after Asotin, Tucannon, and Lower Snake) and incorporating Oregon data was an afterthought. ***Thank you for your comment.***
- "The Walla Walla Basin Watershed Council as Subbasin Co-lead, agree to not approve the May 28th version at its time of submittal, and instead agreed only to approve the submittal of the Plan in its current version to the Northwest Power and Conservation Council." ***Thank you for your comment.***
- Concern by watershed council that "as the Subbasin Plan is describing recovery conditions for ESA listed Bull Trout and Steelhead at the same time the irrigation community has been completing a legally binding Habitat Conservation Plan (HCP) for those two species." Watershed council did not want their approval of a draft subbasin plan they had not had adequate time to review to complicate legal proceedings pertaining to the HCP. ***Thank you for your comment.***
- Very numerous (4.5 pages) editorial, fact checking and technical suggestions. ***These comments will be incorporated to the extent possible in the November 2004 version of the Walla Walla Subbasin Plan.***
- Important for SPT to integrate the CTUIR and WDFW Aquatic RME Plan into one document. ***This comment has been addressed in the Addendum Package (see Section 2.2 and Appendix AD3).***
- p. 82 Figure 4-4; the Oregon half of this land cover disturbance map is missing. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan. The Pre and Post Ag Zones maps for Oregon only on page 80 were the comparable maps for page 82 "land cover disturbances".***
- p. 86 Table 4-8; this Grassland habitat protection table appears to not take into account CRP acres in Washington or Oregon. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan. Habitat type protection status tables reflect only acreage that is under some form of <u>permanent</u> protection. Due to the 10 year limitation (non permanent protection) of CRP contracts in Washington and Oregon, CRP acres were considered to be of short term high protection status and consequently were***

listed apart from permanently protected grasslands (see Table 4-6 of subbasin plan). This does not diminish the importance of CRP acreage to wildlife and the environment.

- p. 88 Table 4-9; this Riparian Wetlands protection status does not seem to take into account acres protected by CREP, conservation easements, USFWS lands at Wallula, National Park Service lands, State Park lands, or BLM, and Forest Service lands. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan. Habitat type protection status tables reflect only acreage that is under some form of permanent protection. Due to the 15 year limitation (non permanent protection) of CRP contracts in Washington and Oregon, CREP acres were considered to be of short term high protection status and consequently were listed apart from permanently protected grasslands (see Table 4-7 of the subbasin plan). This does not diminish the importance of CREP acreage to wildlife and the environment. Riparian wetlands within the context of the subbasin planning document were defined as "wetlands within and/or associated with riverine habitat." As a result, riparian wetland acres reflect only those associated with rivers and streams.***
- p. 89 Table 4-10; this Shrub-Steppe protection status table does not appear to take into account CRP acreages. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan. Habitat type protection status tables reflect only acreage that is under some form of permanent protection. Due to the 10 year limitation (non permanent protection) of CRP contracts in Washington and Oregon, CRP acres were considered to be of short term high protection status and consequently were listed apart from permanently protected grasslands (see Table 4-6 of subbasin plan). This does not diminish the importance of CRP acreage to wildlife and the environment.***
- p. 93 3rd paragraph; contrary to the statement referring to ECA priorities, ECA data is now available for Oregon. See figure 4-9b on page 96. ***This comment has been addressed in the November 2004 version of the Walla Walla Subbasin Plan. Language in paragraph 3 on page 93 that references "no OR data" has been removed.***
- p. 97 Figure 4-10; where is the Oregon half of the map? ***This comment has been addressed in the November 2004 version of the Walla Walla Subbasin Plan. The map in question has been removed. It is simply an overlay of the ECA on top of habitat types. Oregon ECA designations are shown in Figure 4-9b on page 96 of the subbasin plan.***
- p. 102 Figure 4-16; where is the Oregon counterpart to this map Replace with BBC for Yellow warbler. ***This comment has been addressed in the November 2004 version of the Walla Walla Subbasin Plan. The revised Figure 4-16 now shows both Oregon and Washington distribution of the Yellow warbler.***
- p.152 Table 7-5; Include conservation easements in all strategies that mention CREP and CRP as conservation easements are a tool being used in Oregon and Washington which provides lasting protection for farmland, riparian areas, or wildlife habitat, whereas the CRP and CREP investments are subject to potential vegetation removal at the end of a 10-15 year contract and conversion back to farmland or to residential or commercial development. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan. Conservation easements can be either short-term or long-term. CRP and CREP can be considered short-term conservation easements as represented in the subbasin plan.***

BPA, August 12, 2004

- Very concerned about lack of prioritization of strategies in many subbasins, which will make it challenging to use subbasins in the review, selection and recommendation of projects by the Council for BPA funding in future provincial processes. ***This comment has been addressed in the Addendum Package (see Section 1.3).***

Robert Hutchens, August 8, 2004

- Does not believe that private land or property acquisition by governments should be an acceptable strategy for habitat enhancement or protection in the Walla Walla SBP. ***This comment has been addressed in the May 2004 version of the Walla Walla Subbasin Plan (see pages 128-129 and Appendix I).***
- Education, incentives and private resource management will be far more effective and less costly over time. ***Thank you for your comment.***
- There is already significant public ownership in the subbasin. ***Thank you for your comment.***

Native Creek Society, July 11, 2004

- Cites language on p. 70 regarding streams drying up as a result of sending more water down the Walla Walla River.
- This "clinical, sterile" statement does not portray the seriousness of the impact on wildlife.
- Cites many examples of major effects on wildlife and plants.
- Water should be maintained in these streams which were historically year round streams.
- One solution is that the priority Tribal Fish Water Right be established in all streams and the remainder divided in accordance to priority of rights without regard to the state line. Cites a court case.

Thank you for your comments.

Oregon Invasive Species Council, August 6, 2004

- Supportive of subbasin plans and provides additional information about invasive species management plans and the work of the council that they would like included in the final plan. ***These comments will be incorporated to the extent possible in the November 2004 version of the Walla Walla Subbasin Plan.***

NOAA Fisheries, August 12, 2004

Comments specific to the Walla Walla SBP:

- Map TRT population definitions on to subbasin planning populations. ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***
- Explicitly describe the relationships of key driving habitat factors to modeled changes in productivity/diversity for scenarios used to establish planning objectives...If EDT is used as a tool, treat the diversity/productivity/abundance outputs as indices, describe relative changes between scenarios (e.g. current vs. moderate restoration) in terms of assumptions regarding the quantity of habitat changes and the amount of change, linkages to fish production rates (key life stages, spawning areas benefiting from projected improved production, etc.). ***This comment cannot be addressed in the current subbasin planning process, but will be addressed in future revisions and additions to the plan.***

Oregon Department of Environmental Quality, April 28, 2004

- In lieu of more assessment text, the Oregon DEQ recommends adding a description of the TMDL process underway, and that it will produce further analysis and goals specific to temperature (and other constituents in Washington). We recommend that it be stated that sub-basin planning goals and TMDLs are compatible and where issues overlap (e.g., riparian vegetation for water quality for salmon), goals should generally be the same. Even now, it could be stated in the plan that *the draft temperature TMDL goals are vegetation and channel structure that would occur without human disturbance,* and that the subbasin plan targets this common goal. ***These comments will be incorporated in the November 2004 version of the Walla Walla Subbasin Plan.***
- Page 113, 'Riparian Function' and 'Temperature' sections: We recommend description of the importance of shade producing vegetation, to reduce stream heating. This is true for all perennial tributaries in the sub-basin. Under 'Temperature' it could be stated that site-specific goals are being developed through the TMDL process, which will target the potential vegetation and channel structure – that which minimizes human-associated stream warming. ***These comments will be incorporated in the November 2004 version of the Walla Walla Subbasin Plan.***