

*Abbreviated Final
General Management Plan / Environmental Impact Statement*



*Lake Roosevelt
National Recreation Area*



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United States Department of the Interior

NATIONAL PARK SERVICE
Lake Roosevelt National Recreation Area
1008 Crest Drive
Coulee Dam, Washington 99116-1259



IN REPLY REFER TO:

Dear Interested Party:

Enclosed you will find the *Final General Management Plan / Environmental Impact Statement for Lake Roosevelt National Recreation Area* (final GMP/EIS). The *Draft General Management Plan / Environmental Impact Statement* (draft GMP/EIS) was released for public comment in October 1998, and the comment period ended January 31, 1999. Public meetings were held in Coulee Dam, Davenport, Spokane, and Kettle Falls, Washington, during December 1998.

This final GMP/EIS is in an abbreviated format and contains a series of corrections and revisions describing changes to the text of the draft GMP/EIS, an updated "Consultation and Coordination" section, copies of substantive comment letters received from all agencies and organizations, and responses to all substantive comments. A copy of the draft GMP/EIS is needed to understand the corrections and revisions.

The National Park Service proposes to implement a new plan for managing the national recreation area that would emphasize maintaining the existing visitor experience by increasing the capacity of existing facilities where feasible and by redirecting other increases in visitation to less used facilities.

A period of no action on the part of the Department of Interior/National Park Service will end 30 days after the U.S. Environmental Protection Agency has accepted the document and published a "Notice of Availability" in the *Federal Register*. Following this period, a record of decision to implement the proposed action will be signed. For further information, contact me at the above address or call (509) 633-9441, ext. 110.

Vaughn Baker, Superintendent
Lake Roosevelt National Recreation Area

**Abbreviated
Final General Management Plan /
Environmental Impact Statement**

Lake Roosevelt

National Recreation Area

Ferry, Grant, Lincoln, Okanogan, and Stevens Counties, Washington

Add the following initial paragraph to the abstract page:

The *Draft General Management Plan / Environmental Impact Statement* was on public review from November 1, 1999, to January 31, 1999. Public meetings on the document were held in Coulee Dam, Davenport, Spokane, and Kettle Falls, Washington, during December 1998. A total of 154 comment letters were received. All substantive comments (156) are addressed in this document. Because the changes to the draft document are minor and confined primarily to factual corrections, which do not modify the analysis, the abbreviated format has been used. Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 CFR 1503.4[c]). This abbreviated format requires that the material in this document be integrated with the *Draft General Management Plan / Environmental Impact Statement* to describe the final plan, its alternatives, all significant environmental impacts, and the public comments that have been received and evaluated.

The release of this *Final General Management Plan / Environmental Impact Statement* will be followed by a 30-day no-action period: if no substantive comments are received during that period, the alternative or actions constituting the approved plan will be documented in a "Record of Decision." For additional information contact Vaughn Baker, Superintendent, Lake Roosevelt National Recreation Area, 1008 Crest Drive, Coulee Dam, WA 99119, (509) 633-9441 ext, 110.

Also, in the second paragraph, 5th line of the abstract page, the following wording should be changed: "increases in visitation to less used ~~areas~~ facilities."

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CORRECTIONS AND REVISION TO THE DRAFT GENERAL MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

The minor changes from the draft to the final plan are discussed in the following text. The page numbers refer to text in the draft GMP/EIS. Text that is to be removed from the draft document appears as ~~remove~~. Text that is to be added appears underlined. Corrected maps are included in this section and are also discussed in the following section.

Region map, facing page three — the labeling of Potholes Reservoir, near the town of Moses Lake, was corrected.

Page iii

Right column, first paragraph, 10th line — “other increases in visitation to less used facilities areas.”

Page v

Top of left column, 3rd line — “encourage use of less popular ~~locations~~ facilities.”

Page v

Right column, last two sentences of first paragraph — “~~Boundary adjustments would not be used to resolve incidents of trespass on public lands, and~~ Normally, adjustments would not be considered for lands that are below the 1,310-foot contour interval or to resolve incidents of trespass.”

Page 4

Left column, first paragraph, 10th line — “visitation to less used facilities in areas the national recreation area.”

Page 17

Left column, last paragraph on **operational issues**, sixth line — “noxious weeds, and the protection of sensitive natural and cultural resources. All laws, rules, and regulations will continue to be enforced, and ongoing programs such as protection of cultural resources and noxious weed control will remain.

Page 19

Right column, first paragraph on tribal plans — “The two tribal governments both manage portions of the Lake Roosevelt reservoir and are land managers for large areas of lands adjacent to the shoreline within the boundaries of their respective reservations. ~~Although most lands within the national recreation area do not directly adjoin reservation lands and are not directly affected by tribal plans and policies,~~ The National Park Service recognizes the importance of coordinating its land management policies with those developed by the tribes and ~~In~~ light of this, the National Park Service does keep keeps abreast of ongoing planning efforts on tribal lands — such as the shoreline management plan that is currently being developed by the Colville Tribe and the designations of other special uses or zones within the reservations, such as designated game preserves, that could be affected by NPS management decisions.

Page 23

Left column, 1st paragraph, 8th line — “visitation to less used facilities in areas the national recreation area.”

Page 24

Right column, between second and third bulleted statements, add the following bulleted paragraph:

- This plan generally does not address in detail those issues that are lakewide in nature. Several issues were identified during scoping that will require lakewide plans to adequately address issues such as concessions, visitor services, and the regulation of personal watercraft. The collaboration and agreement of all of the managing partners on Lake Roosevelt will be needed to resolve these types of issues.

Page 25

Left column, first paragraph under concept, 9th line — “New developments would be constructed, where appropriate, to accommodate additional visitors and would be sited at locations that would help distribute use over a wider area of more evenly at facilities within the national recreation area.”

Page 25

Right column, add the following paragraph just before the “Visitor Experience” subheading:

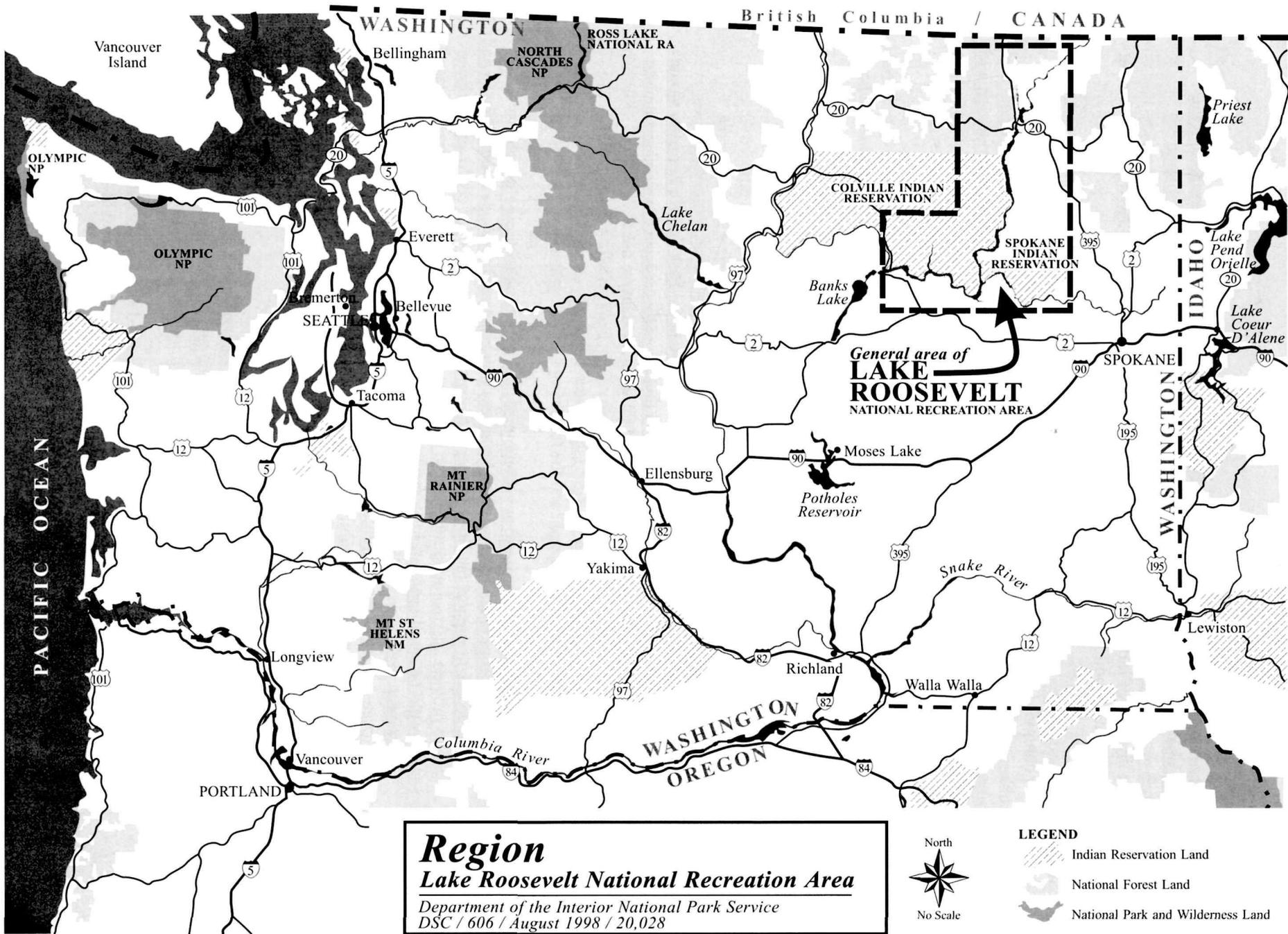
Controlling documents such as the 1990 “Lake Roosevelt Cooperative Management Agreement,” the *Special Park Use Management Plan*, and the *Concessions Management Plan* would continue to provide management direction.

Page 26

Left column, third paragraph is replaced by the following two paragraphs:

~~Because~~ The sensitive resources within the national recreation area are primarily cultural and visual resources. The majority most of the cultural resources which are inundated during peak use periods, and these sensitive resources are not generally a limiting factor when determining the carrying capacity of a given area. During drawdowns these cultural resource areas are exposed and vulnerable to damage from visitors or relic collectors. but There are usually very few visitors present during those times the annual spring flood control drawdown. However, in more recent years, the reservoir has been drawn down in August for flow augmentation downriver as part of salmon recovery efforts. Should these drawdowns increase beyond the level of lake elevation 1,280, cultural resources could be exposed during periods of heavy visitation.

The visual resources at Lake Roosevelt are also sensitive. The beautiful scenery is one of the primary attractions for most visitors, and new facilities must be carefully planned and located to minimize their impact on the scenery.



Region
Lake Roosevelt National Recreation Area
 Department of the Interior National Park Service
 DSC / 606 / August 1998 / 20,028



- LEGEND**
-  Indian Reservation Land
 -  National Forest Land
 -  National Park and Wilderness Land

Page 26-27

Third line in last paragraph at the bottom of page 26 — “would be explored through the revision of the *Concessions Management Plan*, which is scheduled in 2001.”

First line, top of left column on page 27 — “a new boat launch ramp is ~~the Whitelaw landing area~~ on the Sanpoil River Arm . . .”

Page 27

Left column, add the following sentence to the end of the paragraph under the **Boating** subheading (third full paragraph) — Rules for managing the passive waters management area proposed for the upper portion of the Spokane River would be developed in coordination with the Spokane Tribe.

Page 27

Right column, **Crowded Facilities on the Spokane Arm** subheading, 5th line — “would be evaluated to determine their carrying capacity and to determine ~~see if they could~~ should be redesigned to reduce impacts or function more efficiently.

Page 28

Right column under **Community Access**, 8th line — “by existing or proposed NPS/concessioner maintained access points or marinas.”

Page 29

Left column, first paragraph, 14th line — “thereof. The National Park Service normally would not develop or maintain moorage facilities beyond those directly associated with a launch ramp (e.g., courtesy docks). The community, in return for the nonexclusive use . . .”

Page 29

Left column, after the first paragraph, add the following new paragraph —

The plan does not propose new community docks, but rather a process where communities could propose a public access point that could include a launch ramp and appropriate support facilities. Where appropriate, the community could also propose to provide and maintain moorage to serve themselves and others. In essence, these would be small-scale marinas serving areas of the lake not readily served by the larger commercial marinas. While most community access points would probably be located in areas that currently have community dock systems, some existing areas may chose not to become a public access point or may not qualify for other reasons. In addition, there may be communities that do not currently have community docks that would qualify for a community access point.

Page 30

Left column, top paragraph, 5th line — “evaluated for their potential impacts on natural and cultural resources, carrying capacity of the area, and the visitor experience.”

Page 31

Right column, last paragraph, 11th line — “This plan allowed existing permits for those uses that conflict with existing law, regulation, or policy to be extended for up to 11 years and then be phased out.”

Page 32

Left column, last paragraph, 6th line — “through the issuance of special use permits or where the administrative record indicates that the National Park Service was aware of the situation before the approval of the *Special Park Use Management Plan* in 1990 and intended to work with the adjoining property owner on resolving the matter.”

Page 32

Right column, first paragraph, last line — “public notification, and consultation with tribal, state, and local governments.”

Page 39-40, Alternative 1, Southeastern Area map — The dispersed recreation management area between Daisy and Hunters, on the east side of the lake, should have been a developed recreation management area.

Page 41-42 Alternative 1, Northern Area map — The concentrated recreation and special use management areas on the east side of the lake in the Kettle Falls area should be reversed, that is, the pink concentrated recreation area (pink) should be a special use management area (red) and the red special use management area (red) should be a concentrated recreation area (pink).

Page 53, Table 2

Crowding of Facilities on Spokane Arm, 1st line — “Construct no new facilities on Spokane Arm. Evaluate existing facilities for more efficient functioning to determine their carrying capacity and determine if they should be redesigned to reduce impacts or function more efficiently.”

Page 54, Table 2

Concept under alternative 1, the proposed action, 6th line — “would be sited at locations that help distribute use ~~over a wider area of~~ more evenly at facilities in the national recreation area.”

Carrying Capacity under alternative 1, 7th line — “popular facilities areas and charging different fees for different areas to encourage more use at less popular facilities. areas.”

Page 59

Right column, first paragraph, last sentence — “One can often see where the basalts were deposited on top of the granites and then later eroded away by the Ice Age floods.”

Page 87

Left column, first full paragraph, 9th line — “The Canada lynx (*felis lynx canadensis*) a candidate proposed species for listing . . .”

Page 87

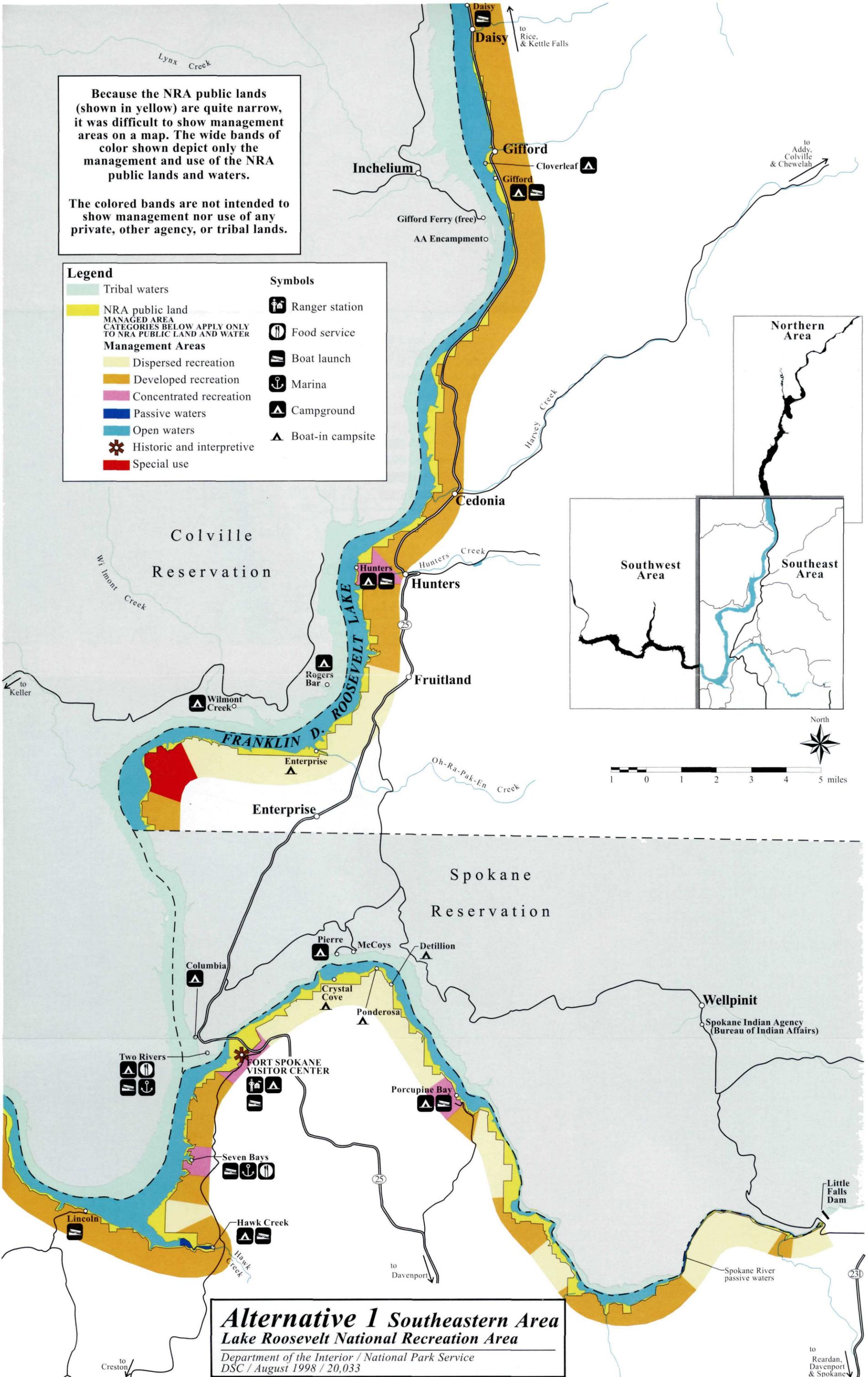
Right column under the **Woodland Caribou** subheading, 6th line — “remnant herd. The herd has been augmented as recently as 1998. However, it is unlikely that woodland caribou would be found in the immediate vicinity of the national recreation area. Woodland caribou are known . . .”

Because the NRA public lands (shown in yellow) are quite narrow, it was difficult to show management areas on a map. The wide bands of color shown depict only the management and use of the NRA public lands and waters.

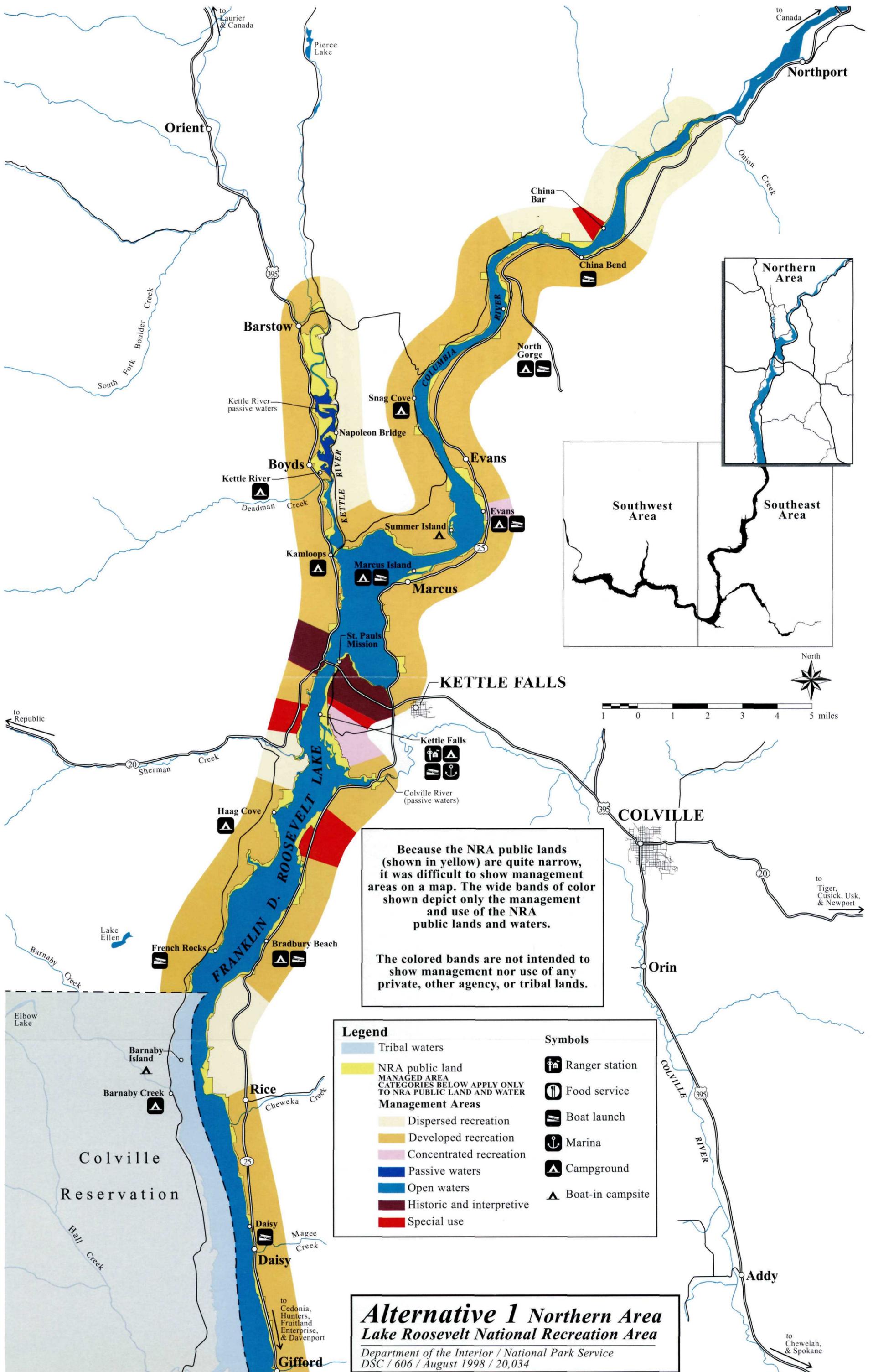
The colored bands are not intended to show management nor use of any private, other agency, or tribal lands.

Legend

- | | |
|---|---|
|  Tribal waters |  Ranger station |
|  NRA public land |  Food service |
| MANAGED AREA CATEGORIES BELOW APPLY ONLY TO NRA PUBLIC LAND AND WATER | |
| Management Areas | |
|  Dispersed recreation |  Boat launch |
|  Developed recreation |  Marina |
|  Concentrated recreation |  Campground |
|  Passive waters |  Boat-in campsite |
|  Open waters | |
|  Historic and interpretive | |
|  Special use | |



Alternative 1 Southeastern Area
Lake Roosevelt National Recreation Area
 Department of the Interior / National Park Service
 DSC / August 1998 / 20,033



Because the NRA public lands (shown in yellow) are quite narrow, it was difficult to show management areas on a map. The wide bands of color shown depict only the management and use of the NRA public lands and waters.

The colored bands are not intended to show management nor use of any private, other agency, or tribal lands.

Legend		Symbols	
	Tribal waters		Ranger station
	NRA public land		Food service
MANAGED AREA CATEGORIES BELOW APPLY ONLY TO NRA PUBLIC LAND AND WATER			
Management Areas			
	Dispersed recreation		Boat launch
	Developed recreation		Marina
	Concentrated recreation		Campground
	Passive waters		Boat-in campsite
	Open waters		
	Historic and interpretive		
	Special use		

**Alternative 1 Northern Area
Lake Roosevelt National Recreation Area**
 Department of the Interior / National Park Service
 DSC / 606 / August 1998 / 20,034

Page 88

Left column, first paragraph, 4th line — “of food. There is an excess of habitat on certain reaches of the river and abundant prey. Eagles feed primarily on fish, . . .”

Page 91

Left column, first paragraph, 3rd line — “aboriginal times they occupied the ~~tributaries of the upper Columbia River~~ lands from the crest of the Cascade Mountains to the current Washington-Idaho border and from interior British Columbia to the Snake River in Washington and the Wallowa-Imnaha drainage in northeastern Oregon (see Confederated Tribes of the . . .”

Page 91

Right column, last paragraph, 2nd line — “now NRA lands. More than 400 documented ethnographic sites have been identified in the Lake Roosevelt area. Yet much has been lost, especially . . .”

Page 93

Left column, first complete paragraph. 4th line — “the Columbia and Spokane Rivers and burial and sacred sites were often located on the higher benches. ~~, which are now inundated by Lake Roosevelt. Many lower terraces in the upper reservoir become exposed during drawdowns.~~ Other types of sites . . . that are above the high-water line. ~~Higher~~ Normal lake levels protect submerged archeological resources on the lower terraces, but the sensitive burial and sacred sites ~~which~~ suffer potential exposure when drawdowns make them accessible, . . .”

Page 94

Left column, last paragraph, last line — “places have yet been formally identified; however, the Colville Tribe is in the process of identifying ethnographic resources and documenting traditional cultural properties in the Lake Roosevelt area.”

Page 118

Right column, third paragraph (second full paragraph), second sentence. Change this sentence to read “The removal of native vegetation would be avoided whenever possible; however, the impacts of the proposed action on vegetation could ~~would~~ range from clearing and light excavation . . .”

Also, add the following sentences to the end of that paragraph — “structures, campgrounds, and other public use areas. Impacts on vegetation would be minimized by careful site selection and design of new facilities. Disturbed areas would be revegetated with appropriate species for the location.”

Page 119

Left column, first paragraph, add the following after the second sentence — However, the removal of native vegetation would be avoided whenever possible. Also, construction and vegetation maintenance activities would be avoided during avian nesting seasons whenever possible to help protect migratory birds. Increased noise from the heavy equipment . . .”

Page 119

Left column, add the following paragraph between the first and second paragraphs — Impacts on wildlife would be mitigated by careful site planning and design. Sensitive species would be identified, and measures would be developed to avoid or minimize work-related impacts. Work would be scheduled to avoid sensitive periods such as nesting or fawning seasons.

Page 119

Right column, last paragraph (on the bald eagle), 2nd line — “overwinter, and more than ~~42~~ 21 nest sites have been identified in the Lake Roosevelt reservoir area.”

Page 120

Left column, top paragraph, 1st line — “developed recreation management areas would not normally occur near known wintering or nesting areas. If eagles were present, the National Park Service would consult with the U.S. Fish and Wildlife Service to develop mitigation plans to minimize impacts on eagles. The cooperating agencies would also develop management plans that would identify ~~carry out~~ protection measures that would be implemented to protect habitat, such as closing occupied nesting areas to visitor use during the breeding season. ~~to reduce potential impacts.~~ The vegetation management program . . .”

Page 120

Left column, third paragraph, 10th line — “improved lake habitat conditions. ~~The managing~~ agencies responsible for Lake Roosevelt fisheries management and the protection of bull trout would develop and ~~also~~ carry out appropriate mitigation to help protect bull trout.”

Page 121

Left column, top paragraph, add the following sentence to the end of the paragraph — Dam operations on the river would continue to negatively affect fish and wildlife, such as bald eagles, that feed on fish and other aquatic organisms.

Page 122

Right column, 12th line — “habitation and fishing sites while ~~Conversely, steep slopes and upper terraces tend to be lower in the density of archeological sites were often the location of burial and sacred sites. Visitors on shore would be congregating mostly along the lakeshore and not on the slopes or upper terraces.~~ Knowledge of these patterns combined with thorough site investigations should provide sufficient information to allow avoidance or identification of needs for mitigation to help minimize impacts ~~lakeshore archeological sites, appropriate visitor use management, and the lower density of archeological sites on the upper slopes would make direct adverse impacts on cultural resources unlikely.~~

More than 400 documented ethnographic sites have been identified in the Lake Roosevelt area. In considering potential impacts, archeological, ethnographic, and . . .”

Page 123

Right column, fourth paragraph (third full paragraph), add the following sentence at the end of the paragraph — “The Colville and Spokane Tribes would be consulted on all matters relating to cultural resources.”

Page 124

Right column under the “**Cumulative Impact**” subheading — The survey and inventory ~~and management~~ of NRA archeological and historic resources is well in hand, significantly contributing to accumulated cultural resources knowledge in the region. Most of this work has been done by the Colville and Spokane Tribes as part of an effort sponsored by the Bureau of Reclamation and the Bonneville Power Administration to identify cultural resources affected by the operation of the Columbia River federal power system. Although a cooperative and productive dialogue exists and is ongoing with their American Indian neighbors, NRA staff ~~can~~ could benefit through more communication with . . .”

Page 133

Right column, replace the **List of Agencies, Organizations, and Individuals to Whom the Draft Environmental Impact Statement Is Being Sent** with the following **List of Agencies, Organization, and Individuals to Whom the Final Environmental Impact Is Being Sent.**
Note: An * denotes those agencies/individuals who commented on the draft document.

Federal Agencies

Advisory Council on Historic Preservation
Bonneville Power Administration*
Bureau of Indian Affairs, Colville Agency
Bureau of Indian Affairs, Spokane Agency
Bureau of Reclamation
Environmental Protection Agency*
U.S. Fish and Wildlife Service*
U.S. Forest Service, Colville National Forest

Washington Congressional Delegation

Senator Slade Gorton
Senator Patty Murray
Representative George Nethercutt
Representative Doc Hastings

Native American Groups

Confederated Tribes of the Colville Reservation*
Spokane Tribe of Indians*
Colville Tribe, Tribal Historic Preservation Officer*

State of Washington

Governor, State of Washington
State Senator Bob Morton

State of Washington, Department of
Ecology, Environmental Review

State of Washington, Department of Community Development,
Archeology/Historic Preservation
Washington State Historic Preservation Officer

County and Local Governments

Ferry County Commissioners
Grant County Commissioners
Lincoln County Commissioners*
Okanogan County Commissioners
Stevens County Commissioners*
Lincoln County Planning Department
Stevens County Planning Department*

Organizations

The Grand Coulee Grange*
The Lake Roosevelt Forum
Lake Roosevelt Property Owners Association*
National Parks and Conservation Association*
Roosevelt Recreational Enterprises
Save Our Shoreline*
Spokane Walleye Club

Individuals

There are approximately 1,200 individuals on the mailing list. Several hundred of these indicated that they were affiliated with more than 100 various types of organizations, businesses, schools, etc.

Page 158

Top of page — The last part of the sentence that begins on the bottom of page 157 was accidentally omitted from the top of page 158. The entire sentence should read as follows: “Likewise, there may be opportunities for the tribes to contract for services or facilities with the other parties. Nothing in this Part shall limit a party from utilizing bidding procedures.” Full text is shown on the following reprinted draft page 158.

Page 159

The misspelling in the Cooperative Agreement Zoning map title has been corrected; see following reprinted page.

Page 169, appendix F

Left column, first sentence — “The state of Washington ceded concurrent jurisdiction to the federal government in ~~February 1940~~ March 1939 through an act passed by the . . .”

facilities with the other parties. Nothing in this Part shall limit a party from utilizing bidding procedures.

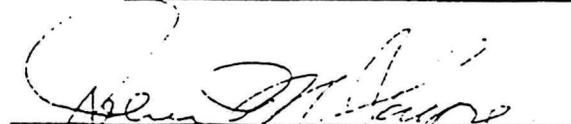
APPROVED:

APR 20 1990

DATED: APR 20 1990

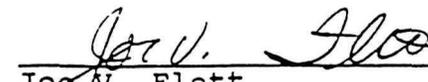
DATED: _____

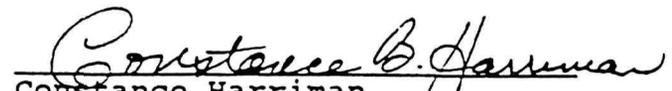

Jude C. Stensgar
Chairperson
Colville Business Council


John M. Sayre
Assistant Secretary for
Water and Science

DATED: APR 20 1990

DATED: APR 11 1990


Joe V. Flett
Chairperson
Spokane Indian Tribe


Constance B. Harriman
Assistant Secretary for
Fish, Wildlife and Parks

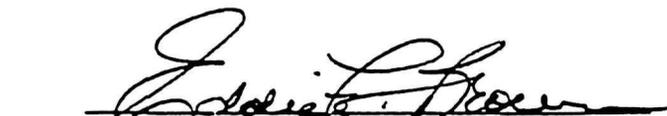
DATED: APR 10 1990

DATED: _____

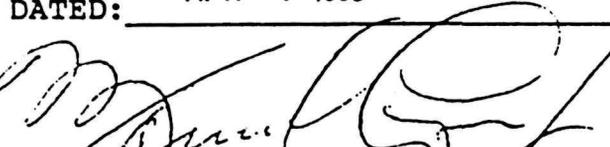

James M. Ridenour
Director
National Park Service


Dennis Underwood
Commissioner
Bureau of Reclamation

DATED: APR 20 1990


Dr. Eddie F. Brown
Assistant Secretary for the
Bureau of Indian Affairs

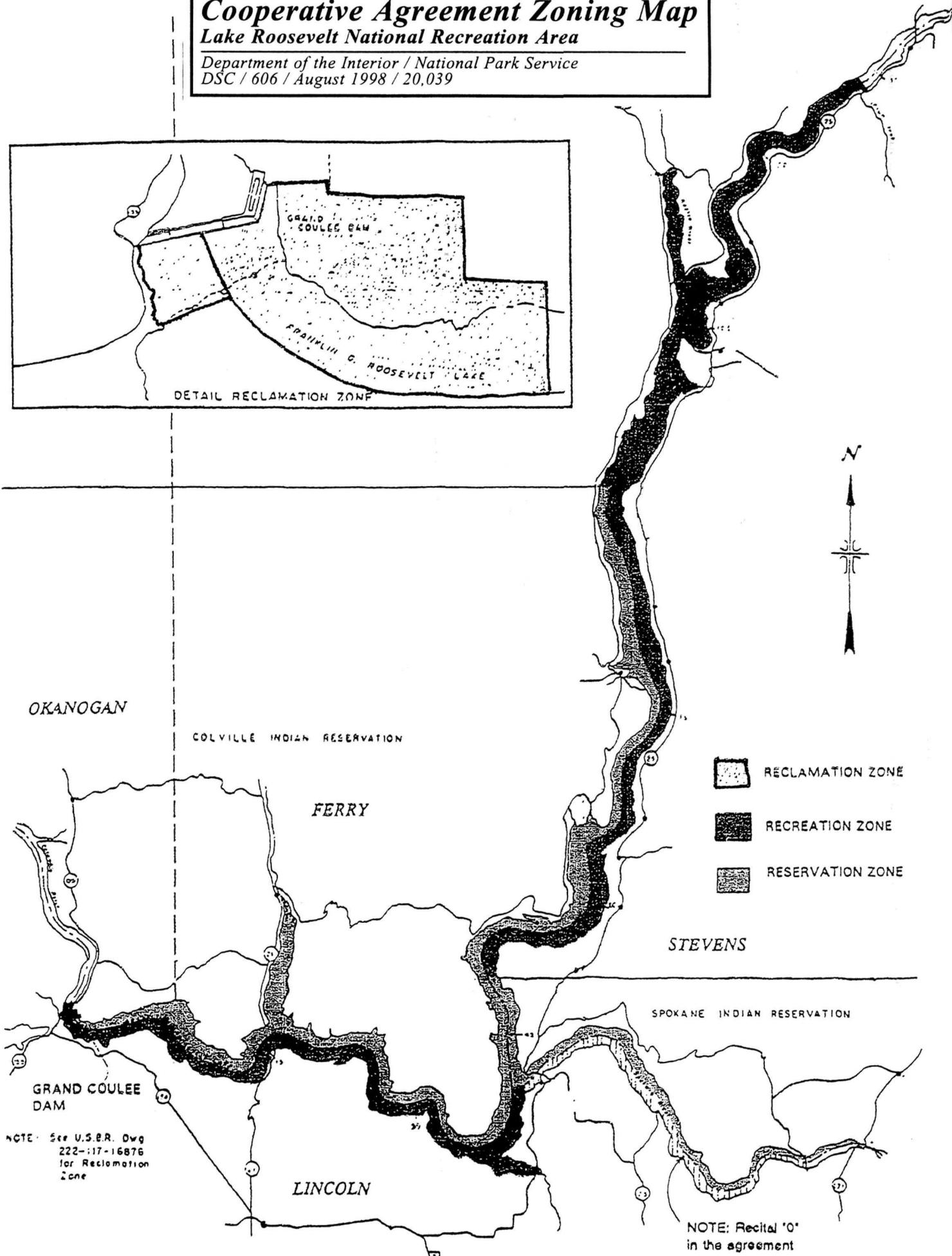
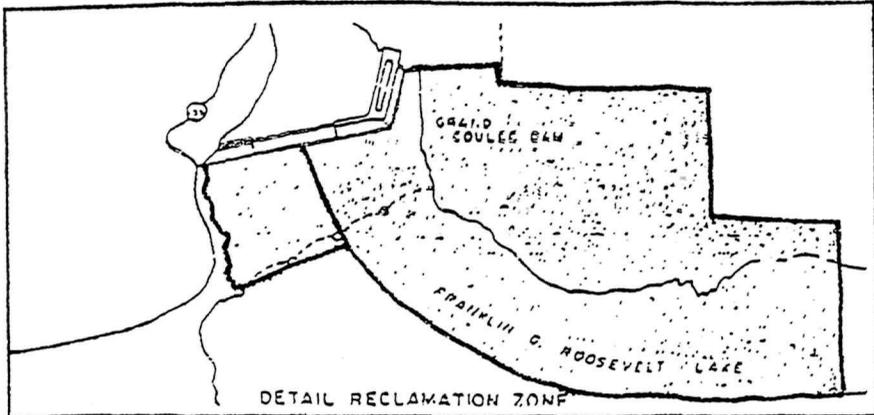
DATED: APR 05 1990


Manuel Lujan, Jr., Secretary
Department of Interior

Cooperative Agreement Zoning Map

Lake Roosevelt National Recreation Area

Department of the Interior / National Park Service
DSC / 606 / August 1998 / 20,039



NOTE: See U.S.B.R. Dwg
222-117-16876
for Reclamation
Zone

NOTE: Recital 'O'
in the agreement

Page 169, appendix F

Right column, second full paragraph, last line, add the following sentence — “party’s jurisdictional area. A similar agreement with the Spokane Tribe was signed on May 27, 1999.”

Page 169, appendix F

Right column, last paragraph — “Fishing regulations on Lake Roosevelt vary with the managing entity. A Washington State or Colville Tribe fishing license is required to fish on Lake Roosevelt within the NRA boundaries. A Washington state fishing license is required to fish within the NRA boundaries. A Colville Tribal or state fishing license is required on Lake Roosevelt waters within the Colville Reservation boundaries. Those portions of Lake Roosevelt within the boundaries of the Colville and Spokane Indian Reservations are subject to applicable tribal laws and regulations.”

COMMENTS AND RESPONSES ON THE DRAFT GENERAL MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

This section presents the agency and public comments received on the *Draft Environmental Impact Statement* (draft EIS) and *Draft General Management Plan* (draft GMP). The comments and responses enable interested parties (including NPS decision makers) to review and assess how other agencies, organizations, and individuals have responded to the proposed actions, the alternatives, and their potential impacts.

PUBLIC REVIEW OF THE DRAFT DOCUMENT

The draft document was mailed to the public the last week of October 1998. The public review and comment period began on November 1, 1998, and ended on January 31, 1999. Approximately 1,200 copies of the document were sent out in the initial mailing, and an additional 200 copies were mailed to subsequent requesters.

Four public meetings to answer questions about the draft were held during the review and comment period. The dates and locations for the meetings were: November 30, 1998, in Coulee Dam, Washington; December 1, 1998, in Spokane, Washington; December 2, 1998, in Kettle Falls, Washington; and December 3, 1998, in Davenport, Washington. Press releases and paid advertisements in local newspapers were used to announce the meetings.

A meeting to answer questions and review comments with the Spokane Tribe was held in Wellpinit, Washington, on February 3, 1999. A meeting to answer questions and review comments with the Colville Tribe was held in Nespelem, Washington, on March 17, 1999.

A meeting to review draft responses to comments was held with the intergovernmental planning team in Davenport, Washington, on April 7, 1999.

A total of 154 comment letters were received during the comment period, as well as numerous comments and questions presented verbally at the public meetings. All comments received were reviewed and considered by the Park Service in the preparation of this *Final Environmental Impact Statement*, consistent with the requirements of 40 CFR 1503. Of these, 156 comments were deemed substantive and warranted a response; the comments and responses are included below. Substantive comments are defined as those that do one or more of the following:

- (a) question, with reasonable basis, the accuracy of information in the environmental impact statement
- (b) question, with reasonable basis, the adequacy of environmental analysis
- (c) present reasonable alternatives other than those presented in the environmental impact statement
- (d) cause changes or revisions in the proposal

In other words, they raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or those that only agree or disagree with NPS policy, are not considered substantive.

Because of the volume of the comments received, not all comment letters have been printed. Where numerous written comments or form letters were redundant, a representative sample letter or form has been printed, along with a single response that is applicable to all similar comments. For some comments that varied only slightly, summary comments have been included. For example, a response to a comment might say “See summary comment B.” The summary comments A through G are presented below for easy reference. The table of contents will also guide readers who are referred to other letters for a response to a comment.

Summary Comment A — NPS Authorities Concerning Grazing

The regulations governing lands managed by the National Park Service prohibit grazing or other agricultural uses except:

- (1) As specifically authorized by federal statutory law; or
- (2) As required under a reservation of use rights arising from acquisition of a tract of land; or
- (3) As designated, when conducted as a necessary and integral part of a recreational activity or required in order to maintain a historic scene. (36 CFR 2.60)

Exception (2) applies if the rights to use the land acquired for the Grand Coulee Dam project for grazing or other agricultural uses were reserved at the time of acquisition. In most cases, the federal government acquired the land in fee simple with no reservations. Exception (3) applies only to historic sites and other areas where grazing or other agricultural uses are an important part of the reason the area was established as unit of the national park system. As water-based outdoor recreation is the primary purpose of the national recreation area, that exception has been construed as not applying to the lands within the recreation area.

It has been asserted that grazing is “specifically authorized by federal statutory law” under exception (1), and that statutes pertaining to the Bureau of Reclamation specifically authorize grazing.

We have reviewed various statutory authorities of the Bureau of Reclamation including 43 U.S.C. § 387. Section 387 provides, in part:

The Secretary, in his discretion, may.... grant leases and licenses for periods not to exceed 50 years.

This section of the Reclamation Act has been interpreted by at least one court to authorize the secretary to lease reclamation lands for grazing when the lands are not needed for the purpose for which they were reserved — *Clyde v. Cummings*, 101 P. 106 (Utah 1909). The statute does not specifically mention grazing, however, nor do other Bureau of Reclamation statutes that have been reviewed.

The 1935 act authorizing the Grand Coulee Dam specifically identifies the following purposes for the project:

- controlling floods
- improving navigation
- regulating the flow of the streams of the United States
- providing for storage and for the delivery of the stored water thereof
- reclamation of public lands and Indian reservations
- other beneficial uses
- generating electrical energy as a means of financially aiding and assisting such undertakings.

The 1943 Columbia Basin Project Act, 16 USC §§ 835-1, 835c, refers to the “purpose of assisting in the permanent settlement of farm families.” Grazing is not mentioned by name in the Columbia Basin Project Act. Also, we are advised that the Bureau of Reclamation interprets this statute to refer to the permanent settlement of farm families on Columbia Basin Project lands set aside as suitable for irrigated farmland, i.e., irrigation project lands — not to the freeboard land administered by the National Park Service as Lake Roosevelt National Recreation Area, which is immediately adjacent to, and on the periphery of, Lake Roosevelt.

Given the above considerations, we have concluded that grazing and other agricultural uses are not specifically authorized by statute, as required by 36 CFR 2.60. In the absence of specific authority in law, the National Park Service cannot permit grazing or other agricultural uses of the public lands administered as Lake Roosevelt National Recreation Area.

Summary Comment B — The NPS Management Role

Congress provided specific direction in the form of Committee Report language with regard to how the counties and other interested parties were to be included in the development of the *General Management Plan*. The Conference Committee Report on the FY97 Omnibus Appropriations Act contained the following reference to the *General Management Plan*:

Local participation is critical to the development of successful management plans and the National Park Service is directed to consult thoroughly with affected local government representatives and other interested parties in the development of the management plan.

Congress directed us to “consult thoroughly” with affected local government representatives and other interested parties in the development of the management plan. This congressional direction reaffirmed our obligation under NPS management policies and other laws such as the National Environmental Policy Act to be as inclusive as possible in the development of the management plan and to work closely with local governments and others during this process.

The committee report does not, however, indicate that it was Congress' intention that the secretary of the interior share his authority as delegated to the National Park Service for managing the public lands and waters at the Grand Coulee Project with other governmental entities. Had Congress intended that to be the case, legislation amending current law would have been needed.

To carry out the congressional direction to “consult thoroughly” with local governments and other interested parties, we established an intergovernmental planning team to work with us throughout the planning process. This represented a significant change in how the National Park Service has typically prepared general management plans. In the past, the counties and others would most likely not have been part of the planning team and likely not have seen any information or had any input except during public scoping and the review of the draft document. Because the counties, as well as the tribes and the State of Washington, all have responsibilities related to Lake Roosevelt and its environs, it seemed to make sense to include all such entities as “planning partners” throughout the process.

Although the complex jurisdictional issues related to Lake Roosevelt prevented a joint planning effort and agreement such as you suggest, we are hopeful that through improved working relationships and mutual understanding we can better coordinate our planning and management responsibilities with the surrounding governmental entities.

Summary Comment C — The NPS General Management Planning Process

The National Park Service has recently changed its approach to the development of general management plans. In the past they often were very detailed and contained specific development proposals. These documents were generally very complex, lengthy, and expensive to prepare because of the level of detail they contained and the resulting impact analysis required to evaluate alternatives. These plans were contingent upon funding that often was not available or that came many years after the plans were developed. Often, when funding was received, plans had to be revised because conditions had changed in the intervening years since the original plan was approved.

To avoid this situation, new NPS directives require that general management plans be prepared in a manner that provides the policy and guidance that managers need to make decisions that support the purpose and significance of the unit. The general management plan forms a framework for this process. This helps avoid the level of detail in the old plans that often became obsolete before proposed actions could be implemented.

As a result, the alternatives that are proposed are more general in nature. They are designed to provide more of a management philosophy than a detailed plan for development. This is intended to provide some of the flexibility that managers need to respond to changing future conditions.

The alternatives that were developed reflect the fact that the planning team felt that the National Park Service's past management philosophy was generally appropriate and should be continued; and in light of the recreation area's purpose and significance, no significant change in management philosophy was needed.

With regard to your suggestion that the plan be more specific in terms of location and type of future development, we agree with your comments that this should be addressed on a lakewide basis. Accordingly, we would recommend to the managing partners that the *Concessions Management Plan* that is due for revision by 2001 be the vehicle for doing this. Because the concessions plan already addresses commercial visitor services, it would seem a logical extension to have it also address the need for additional visitor services and facilities — both public and commercial. In the interim, the National Park Service would focus on expanding or rehabilitating existing facilities where needed to accommodate existing levels of use. Community access points could be developed as long as they did not exceed the existing number of authorized community-based facilities.

Summary Comment D — The NPS Management Authorities

There is no one document or law that can be referenced on this issue. Rather, a series of laws, regulations and agreements must be reviewed to determine the various authorities and responsibilities for the federal lands at Lake Roosevelt. These authorities and responsibilities have evolved over time as new laws have been passed and implementing regulations and cooperative agreements have been developed.

In the original 1946 Tri-Party Agreement the National Park Service was assigned responsibility by the secretary of the interior for planning and managing the federal lands within the recreational area (as it was known in those days). This assignment of land management responsibilities on federal reclamation projects to other entities was not uncommon on larger western reservoirs where the Bureau of Reclamation sought to have other entities be the land manager. In those instances where the recreation potential and resource values were considered to be of national significance, the National

Park Service was often assigned the land management responsibilities. In addition to Lake Roosevelt, this occurred at Lake Mead and Lake Powell (among others). This assignment of land management responsibilities to the National Park Service via cooperative agreement was authorized by Congress in 1946 (60 Stat. 885; 16 USC 17j-2[b]).

In 1970 Congress declared the national park system to include “any area of land and water now or hereafter administered by the Secretary of the Interior through the National Park Service for park, monument, historic, parkway, recreational, or other purposes” (Act of August 18, 1970, 84 Stat. 826, 16 USC 1c(a)).

Units of the national park system are managed under the general provisions of the 1916 Organic Act, which establishes the authority and defines the purposes and mission of the National Park Service as follows:

promote and regulate the use of federal areas known as national parks, monuments, and reservations hereinafter specified, . . . by such means and measure as conform to the fundamental purpose . . . to conserve the scenery and the natural and historic objects and the wildlife herein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations. (emphasis added)

The 1970 Act of Congress clarified that this NPS core mission also applied to areas such as Coulee Dam National Recreation Area. Although recreation was and is the dominant use of the federal lands and waters within the national recreation area, the National Park Service is to also manage for the protection of the natural and cultural resources that might be found on these lands.

The 1946 Tri-Party Agreement was nullified by the secretary of the interior in 1974, and the agencies were directed to negotiate a new agreement to include the Colville Confederated Tribes and the Spokane Tribe of Indians.

On April 5, 1990, the secretary of the interior approved the new “Lake Roosevelt Cooperative Management Agreement,” which was signed by the two tribes as well as the Bureau of Reclamation, the Bureau of Indian Affairs, and the National Park Service. The agreement further acknowledged the status of Coulee Dam (Lake Roosevelt) National Recreation Area as a unit of the national park system and as such was “subject to all NPS laws, regulations, policies and guidelines.” The agreement further directs that the National Park Service shall

Manage, plan and regulate all activities, development, and uses that take place in the Recreation Zone (Area) in accordance with applicable provisions of federal law and subject to the statutory authorities of Reclamation, and consistent with the provisions of this Agreement subject to Reclamation’s right to make use of the Recreation Zone (Area) as required to carry out the purposes of the Columbia Basin Project.

Summary Comment E — Moorage at Community Access Points

The National Park Service feels that there are areas on the lake that are underserved for moorage. The plan does not propose new community docks in specific locations, but rather a process where communities could propose a public access point that could include a launch ramp and appropriate support facilities. Where appropriate, the community could also propose to provide and maintain

moorage to serve themselves and others. In essence, these would be small-scale marinas serving areas of the lake that are not readily served by the larger commercial marinas. Although most community access points would probably be in areas that currently have community dock systems, some existing areas may chose not to become a public access point or may not qualify for other reasons. In addition, there may be communities that do not currently have community docks that would qualify as a community access point.

To prevent the unintended proliferation of these community based facilities, help maintain the shoreline's natural character, and avoid stimulating private development where it might not be desirable, the number of community access points would initially be limited to the number of community facilities currently under permit, which is 18. When the number of authorized community access points approaches this limit or 10 years from approval of the general management plan, whichever comes first, the National Park Service would review the program. In this review there would be full consultation and public review. There would be a determination as to whether the program was meeting its intended objectives, whether it should be continued, and if so under what conditions, including the number of additional access points that might be authorized.

Summary Comment F — NPS Authorities for Establishing Community Access Points

The National Park Service has broad authority for providing public facilities that support the purposes for which the recreation area was established. On the other hand, the authority for permitting private or semiprivate facilities on public lands is limited to those circumstances where Congress has provided specific authorization in law. Because community access points would serve the public at large, they would fall under the NPS general authorities for providing public facilities.

Congress also provided specific direction in the form of Committee Report language with regard to providing additional public access to Lake Roosevelt, including the retention of existing community docks that were deemed appropriate for public use. The Conference Committee Report on the FY97 Omnibus Appropriations Act contained the following reference to providing greater public access:

The conference agreement recognizes the increased public demand and lack of adequate public facilities and encourages the National Park Service to consider retaining access to existing community docks, deemed appropriate for public use, within current environmental guidelines, as it develops the Lake Roosevelt National Recreation Area general management plan. In addition, the National Park Service is encouraged to consider other alternatives for providing greater public access to Lake Roosevelt in the development of the management plan.

Summary Comment G — Development of Community Access Points

It is correct that community access points are envisioned as partnerships between the National Park Service, counties, and local community organizations. Development and maintenance costs could be provided by the sponsoring community organization, the county, the National Park Service, or a combination thereof (see page 29 of the draft plan). In the public meetings on the draft plan, we cited the following examples of community access points: Hanson Harbor where the National Park Service developed all of the facilities; Lincoln where Lincoln County and the National Park Service worked together to develop the launch ramp and associated facilities; and Rantz Marine Park, where the community was allowed to develop a high-water launch ramp on public lands in return for allowing the public to drive through their community to access the ramp.

With regard to overnight moorage in conjunction with community access points, the text has been revised to reflect that any moorage beyond that directly associated with a launch ramp (e.g., courtesy dock) would be the community's responsibility to develop and maintain for public use. As communities offering overnight moorage facilities would in essence be operating small-scale public marinas, the facilities would be subject to the laws and regulations applicable to such facilities.

About 100 pages of responses to comments as on the following page.

COMMENTS

RESPONSES



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

January 29, 1999

In reply refer to: ECN-4

Mr. Vaughn L. Baker
Superintendent
Lake Roosevelt National Recreation Area
1008 Crest Drive
Coulee Dam, WA 99116-1259

Dear Mr. Baker:

We have reviewed the National Park Service (NPS) draft environmental impact statement (EIS) and general management plan for the Lake Roosevelt National Recreation Area, and are pleased that they recognize Bonneville Power Administration's (BPA) power production (pp. 17 and 23) and fishery interests (p. 86). BPA also has a substantial interest in cultural resource management at Lake Roosevelt.

BPA's cultural resource management interests at Lake Roosevelt are documented in (1) the Programmatic Agreement for Compliance with the National Historic Preservation Act (among BPA and the NPS, *et al*) Regarding Federal Columbia River Power System Hydroelectric Operations (1991), and (2) the Memorandum of Agreement Among NPS, Bureau of Reclamation (BR), and BPA for Cultural Resource Investigations within the Lake Roosevelt Recreation Zone (1998). As you know, BPA and the BR, in collaboration with the Colville Confederated Tribes, Spokane Tribe of Indians, and NPS, are making substantial investments in cultural resource management at Lake Roosevelt.

A

We are therefore also pleased that the draft EIS/Management Plan recognizes the need to protect cultural resources. But the EIS and Management Plan should emphasize that vandalism of cultural resources is a significant problem at Lake Roosevelt. While the draft EIS mentions "...looting and damage from vehicles illegally driven..." (p. 93), we believe this understates the actual problem. Looting of archeological sites has occurred at many locations in the Lake Roosevelt National Recreation Area, and also vandalism of petroglyphs.

B

Accordingly, we further recommend that the interpretive/education programs referenced in the proposed action include information on the severe legal penalties for violating laws protecting cultural resources. Finally, we ask that the management plan support promotion of the Crime Witness Program operated by BPA and BR. The program features a toll-free hotline to gather information about a crime or a crime in progress on BR property. Responsible visitors to the Lake Roosevelt National Recreation Area would be helpful allies in our efforts to protect important cultural resources from illegal looting and other vandalism.

Department of Energy

- A Your point is a good one. The text on page 122 of the draft plan has been revised in the final to reflect that the upper benches in particular are susceptible to vandalism and looting because these areas often contain sacred sites including burials and are the areas exposed during the spring drawdown of the reservoir.
- B This is another good point. Our interpretive/education program will include information on the penalties for violating laws that protect cultural resources. We work with both tribes to provide protection to sensitive archeological and burial sites that are exposed during the drawdown. We would be pleased to consider programs such as the Crime Witness Program for applicability within the national recreation area.

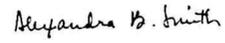
COMMENTS

RESPONSES

2

Thank you for the opportunity to review the draft EIS and Management Plan. If you have any questions about these comments, please contact Mr. Thomas C. McKinney at (503)230-4749.

Sincerely,



Alexandra B. Smith
Vice President, Environment, Fish & Wildlife



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 10
 1200 Sixth Avenue
 Seattle, Washington 98101

RECEIVED
 JAN 15 1999

JAN 8 1999

Reply To: LRNRA
 Attn Of: ECO-088

File: 97-028-NPS

Superintendent, National Park Service
 Lake Roosevelt National Recreation Area
 1008 Crest Drive
 Coulee Dam, WA 99116-1259

RE: **Draft General Management Plan/Environmental Impact Statement
 (DEIS) for the Lake Roosevelt National Recreation Area**

Dear Sir:

The following comments are consistent with the review authorities of the Environmental Protection Agency (EPA) under Section 309 of the Clean Air Act. We have rated the DEIS Lack of Objections (LO). The LO rating and a comment summary will be published in the *Federal Register*. The following comments request further discussion about:

1. how the Lake Roosevelt Cooperative Management Agreement (LRCMA) affects development of a new plan;
2. the effect of lake level fluctuations on recreation facilities;
3. water resources;
4. geology, and
5. sustainability.

The DEIS presents and analyzes two alternatives for managing Lake Roosevelt National Recreation Area (LRNRA) for the next 15 to 20 years. Alternative 1 (the Action Alternative) proposes a new management plan that would increase the capacity of existing facilities where feasible and redirect other increases in visitation to less used areas. The purpose is to ensure that the mostly natural character of the shoreline would be maintained and that the public would be able to continue to have access to the resource and use it as they have in the past. The No-Action Alternative (Alternative 2) would continue management of the area as is done presently



Environmental Protection Agency

COMMENTS

RESPONSES

2

without the creation of new options as proposed in Alternative 1.

The Lake Roosevelt Cooperative Management Agreement (LRCMA)

A

The language of Alternative 1 does not clearly indicate, as does Alternative 2, the shared responsibilities of multiple agencies detailed in the Lake Roosevelt Cooperative Management Agreement (LRCMA). Since this relationship will not change for either alternative, EPA recommends that the language of both alternatives be consistent. This will inform the decisionmaker and the public that they are consistent with the LRCMA. Expansion of service in a tightly controlled resource area is what distinguishes Alternative 1 from Alternative 2. The EIS should briefly describe how the signees of the LRCMA are cooperating in development of the new recreation plan.

Lake Levels

B

The authors state that they can not address certain issues because there is no specific authorization from Congress; therefore, they excluded lake level as a scoping issue. However, the document states that in August, when water has to be withdrawn to protect downstream fisheries, some of the developed facilities on the lake are out of service during the peak recreation season because of the low water (pg. 17). Since the fluctuations in lake level can dramatically affect the feasibility of recreation alternatives, it must be discussed in order to give the reader an understanding of why alternatives are or are not feasible.

C

In addition, "Appendix H: Lake Roosevelt Water Elevations, 1991 - 1998" (pg. 171), illustrates condensed information that could be expanded to aid public and decisionmaker understanding of the impacts these drawdowns have on NPS infrastructure and visitor use. EPA recommends that the graph years be broken down by months and explanatory text added to explain the drawdown phenomena in the illustration. It would be useful for the decisionmaker and the public to know, for instance, that the recorded 1208' low point for 1997 occurred in February/March when boating use was low and not in August when visitor use was high. It seems appropriate for the FEIS to discuss in more detail what the cooperating agencies will do under either alternative to protect taxpayer investment in NPS infrastructure that can be impacted by drawdown activities.

Water Resources

D

The proposed action would increase visitor access to water use. This would increase opportunities for fishing. Because of the 1994 Washington Department of Health recommendation that consumption of fish be limited due to toxic substances, dioxins, and furans in lake water (pg. 82), EPA recommends that results of fish tissue tests for these substances be published in the FEIS. Test results should be part of discussion on resource management.

Geological Resources

E

This section would be clearer if recent documents and maps were provided that specify

A Please see the discussion of the "Lake Roosevelt Cooperative Management Agreement" on pages 8 and 9 of the draft plan; a copy of the entire agreement is contained in appendix B of the draft on pages 144-59. The agreement is a controlling document for both alternatives. The text on page 25 in alternative 1 in the draft was revised in the final plan to reflect this. All of the other managing entities at Lake Roosevelt have been a part of the planning team that prepared this document. They have been involved from its inception.

B Lake-level fluctuations do have an impact on recreation area facilities. Generally, these impacts are predictable and minor. The lake is gradually drawn down in late winter to make room for the spring runoff and is refilled by early summer. The extent of this drawdown varies with the weather and snowpack, so the exact impact on facilities varies from year to year. The primary impact is the extra maintenance required to move docks to follow the water and clear debris from beaches and launch ramps. There generally is no damage to facilities. Most of the facilities are designed to accommodate some type of variation in water level to help minimize the impact. The magnitude of the impact to visitors is also minimal in most years because the greatest variations usually occur outside of the prime use season. Occasionally, during very wet years, the drawdowns may extend into the prime visitor season or reduce the water level below the ends of even the deepest launch ramps. This happened during spring 1997 and again in spring 1999. Before 1997 it had been almost 15 years since the last time all of the launch ramps had gone dry. Even though individual months are not shown on the chart in appendix H of the draft plan, a careful reading of it still allows one to interpret the general pattern of spring drawdowns and the return to normal elevations by summer.

The recent phenomena of late summer drawdowns to augment downstream flows for anadromous fish actually has little impact on most facilities. Only a few launch ramps are placed out of service. The greatest impact is on the Kettle Falls marina. It can go dry if lake levels fall below 1,275 feet.

Lake levels do affect the feasibility of alternatives. The National Park Service does not control lake levels, so alternatives that propose controlling lake levels are not feasible.

C The suggestion to distribute this information more widely is good. However, we do not think that the General Management Plan is the best vehicle to do that. There are other documents that the National Park Service and others produce that receive greater public distribution. For example, the Lake Roosevelt Forum featured articles on reservoir operations and projected lake levels in its winter 1999 newsletter.

COMMENTS

RESPONSES

reservoir bank erosion areas along the 312 miles of NRA shoreline. The Bibliography lists documents dating from 1961 - 1985. The relevance of the 1990 Skagit River Hydroelectric Project document, "Existing Conditions of Reservoir and Streambank Erosion", is not clear.

Sustainability and Long-Term Management

F

The reasons for stating that sustainability is not possible within the context of long-term management for this project (pg. 129) are unclear. The recreation area should be managed so that it can be enjoyed by future generations. We would be happy to work with you on the concept of sustainability as you develop the preferred alternative. We look forward to further communication with you on these issues. Please telephone Sheila Crofut of my staff at (206)553-5116 if you have any questions.

Sincerely,

Richard B. Parkin, Manager
Geographic Implementation Unit

cc: Harold Gibbs, NPS

- D Under the auspices of the Lake Roosevelt Water Quality Council, additional fish tissue studies were conducted in 1998. Preliminary results indicate mercury levels in all fish may be declining. The council and the U.S. Geological Survey will prepare a fact sheet summarizing the results once all testing is completed. The National Park Service will participate in any efforts to educate the public about potential health risks.
- E The unstable areas that are subject to bank erosion are numerous and widely distributed over the length of the reservoir. The Bureau of Reclamation has an ongoing program to identify and stabilize these areas. Detailed information about specific locations can be obtained from them. It is beyond the scope of this document to provide detailed information on all of those areas. Before any new facilities are constructed, detailed information will be reviewed to ensure that facilities are not constructed in unstable areas.
- F The national recreation area is managed on a sustainable basis as much as possible. At all its units, one of the primary NPS goals is to leave the area unimpaired for future generations. Facilities are designed to feature natural, renewable, or recycled materials. To reduce dependency on fossil fuels, buildings are designed to be energy efficient. The park has an ongoing program to recycle waste at high use areas in conjunction with established programs in Stevens and Lincoln Counties. Photoelectric cells are being used to provide lighting and power water pumps at remote locations. All facilities are designed to minimize impacts on natural and cultural resources. The proposal continues this theme by not proposing new development in previously undisturbed areas. All areas identified for new facilities are either existing developments or previously disturbed areas. As an example, the new marina proposed for Crescent Bay is on the site of an old sawmill.

COMMENTS

RESPONSES

SUMMARY OF THE EPA RATING SYSTEM
FOR DRAFT ENVIRONMENTAL IMPACT STATEMENTS:
DEFINITIONS AND FOLLOW-UP ACTION *

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantive changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEO.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussion are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEO.

*From EPA Manual 1640 policy and Procedures for the Review of Federal Actions Impacting the Environment.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Upper Columbia River Basin Field Office
 11103 E. Montgomery Drive, Suite 2
 Spokane, WA 99206

RECEIVED

FEB 01 1999

L. R. N. R. A.

January 29, 1999

MEMORANDUM

To: Superintendent, Lake Roosevelt National Recreation Area (NRA), U.S. National Park Service (NPS), Coulee Dam, Washington

From: Field Supervisor, Upper Columbia River Basin Field Office, Spokane, Washington

Subject: U.S. Fish and Wildlife Service (FWS) comments on Lake Roosevelt NRA Draft General Management Plan/Environmental Impact Statement

We have reviewed the Draft Environmental Impact Statement (DEIS) for the Lake Roosevelt National Recreation Area (NRA) General Management Plan. The following comments are provided pursuant to the National Environmental Policy Act (NEPA), Migratory Bird Treaty Act, and the Endangered Species Act of 1973, as amended.

GENERAL COMMENTS

A

Two alternatives are disclosed in the DEIS: The action (the proposed action) alternative would allow expansion of existing facilities and redirect visitors to less visited areas to address increasing visitation to the NRA; the second, or the no-action alternative would maintain present management (based on the 1980 General Management Plan). As described in the DEIS, the no-action alternative does not provide for increasing visitation, and would ultimately result in the overcrowding of existing facilities and "declining quality of visitor experiences." Because only two alternatives are disclosed in the DEIS, the National Park Service (NPS) may have precluded the consideration of less environmentally damaging practicable alternatives.

Construction of new marina facilities (at new locations) and expansion of existing marina facilities, should not be located within 1/2 mile of bald eagle or peregrine nests, or situated between a bald eagle nest and an associated water body, such as the lake, backwater areas, or rivers, that may be feeding areas for bald eagles. Removal of vegetation for construction and/or maintenance activities should be avoided during avian nesting seasons to prevent injury to nesting migratory birds protected under the Migratory Bird Treaty Act. Removal of native trees (including snags), shrubs, forbs and grasses, should be limited to the minimum necessary to maintain NRA infrastructure or to improve wildlife habitat. In addition, Lake Roosevelt/Columbia River are navigable waters of the United States, and as such, a Spill

B

Prevention Control and Countermeasure Plan (SPCC) is required pursuant to 40 CFR part 112 for oil storage facilities. A SPCC plan should be prepared for all existing and proposed marinas that dispense fuel (or other petroleum products) for boating use to minimize the risk of accidental fuel spills and associated injury to fish and wildlife and their habitat.

U.S. Fish and Wildlife Service

A See summary comment C.

B Spill prevention, control, and counter measures (SPCC) plans have been or will be prepared for fuel storage/distribution facilities within the national recreation area in accordance with 40 CFR 112.

COMMENTS

RESPONSES

We are providing the following specific comments pertaining to fish and wildlife resources found in the project study area:

C

1) **Alternative 1 (Proposed Action): Camping, page 27:** *"Camping along the shoreline outside of undeveloped areas would continue to be allowed as long as it could be managed to keep resource impacts at acceptable levels."* Camping in undeveloped shoreline areas should be restricted within ½ mile of bald eagle (and peregrine falcon) nests, when eagles may be present during nesting season, or in or near areas that have been identified as primary foraging areas for bald eagles. Also sensitive wildlife habitat (e.g. wetlands) should not be used as camping sites.

2) **Alternative 1: Boating/Personal Watercraft, page 27:** *"Boating would not initially be restricted beyond current rules and regulations within the open waters management area."* Due to disturbance (primarily noise) associated with motorized boating use, especially personal watercraft (noise and accessibility), we recommend that the NPS consider restricting motorized watercraft use within ½ mile from any active bald eagle and peregrine nests (during the nesting season), and from any areas identified as important feeding, breeding, and rearing areas for shorebirds or waterfowl.

3) **Alternative 1: Kettle Falls, page 28:** Please see our comments # 15 through 17, concerning Kettle Falls Marina (Appendix D).

D

4) **Alternative 1: Dispersed/Developed Recreation, Table 1, page 33:** *"Native plant species would be maintained in natural areas, but nonnative species could be used in developed area landscapes to resolve specific problems that could not be addressed with native species."* We concur with the use of native plant species in dispersed recreation and natural areas. We also recommend the use of native plant species for any vegetative restoration efforts throughout the NRA. Native plant species provide greater habitat value for wildlife, and are generally better suited to the natural environmental conditions, and thus more likely to be self sustaining.

E

5) **Alternative 1: Passive Waters, Table 1, page 34-35:** *"Those water surface areas where special rules and regulations would be imposed to protect resources. . . Restrictions as to the type and size of craft, the use of engines, the manner of operation. . . could be placed on users."* These proposed restrictions should be disclosed in the DEIS. As stated in our comment #2 above, restrictions for motorized boat use should apply to important feeding, breeding and rearing areas for shorebirds, waterfowl, and other wildlife. These restrictions should be identified in the DEIS. Preservation and/or restoration of sensitive wildlife habitat should also be a consideration in the selection of passive water management areas.

F

6) **Affected Environment: Wetlands, page 82:** *"Due to the fluctuating nature of the reservoir, few perennial wetlands exist along the shoreline."* Because wetlands are an important resource and scarce within the NRA, they should be delineated on project maps. They should be identified by wetland type using the Cowardin wetland classification system as shown on the FWS National Wetland Inventory Maps.

G

7) **Affected Environment: Wildlife, pages 84-85:** A map showing areas of sensitive wildlife habitat (i.e., breeding, feeding, and rearing areas), and/or where a concentration of wildlife may occur in or adjacent to the NRA, should be disclosed in the DEIS (or appendices?), so that

- C The National Park Service will continue to informally consult with the U.S. Fish and Wildlife Service to develop conservation measures for protecting listed species within the national recreation area. The Park Service will take the necessary actions to ensure compliance with the Endangered Species Act.
- D NPS policies regarding vegetation and landscape management require that plant material native to the park unit be used to the maximum extent possible. For historic landscapes like those at Fort Spokane, the use of plant materials that are historically appropriate to the period or event commemorated is allowed under NPS policies. For problem areas, such as is in highly erodible areas or where existing nonnative plant communities would outcompete any native species that were planted, NPS policies allow for the use of sterile hybrids or nonnative plants if they conform to the NPS exotic species policy.
- E As noted in table 1 on page 35, specific boating controls will be identified in individual operating plans for each passive water area. Also, see response C above.
- F For most park projects, the National Park Service reviews FWS National Wetland Inventory maps or other site-specific NRA wetland delineation maps to ensure protection of wetlands. For all NRA projects that could potentially affect wetlands, the Park Service delineates and maps wetlands in accordance with "Wetland Protection Procedural Manual #77-1."
- G Detailed wildlife habitat maps for the national recreation area are incomplete. However, the National Park Service did review NPS wildlife habitat maps for the EIS analysis. Presenting detailed wildlife breeding, feeding, and rearing areas that are incomplete on the large-scale maps in the document would likely confuse the readers. Also, see response F above.

COMMENTS

RESPONSES

project reviewers can evaluate the affect of proposed development on these sites. However, specific bald eagle or peregrine nesting sites should not be disclosed.

H

8) Affected Environment: Threatened and Endangered Species, pages 87-88: Canada lynx (*Lynx canadensis*) is now a proposed species for listing under the Endangered Species Act. The herd of woodland caribou (*Rangifer tarandus*) in the Selkirk Mountains was augmented as recently as 1998. However, it is unlikely that woodland caribou would be found in the immediate vicinity of the Lake Roosevelt NRA

I

9) Environmental Consequences: Water Resources, page 114: As stated in our general comments, the NPS should prepare a SPCC plan for all existing and future facilities where oil or petroleum products are stored to minimize the potential for injury to federally listed threatened and endangered species, migratory birds, and other fish and wildlife resources. The NPS should also consider restriction of motorized boat use in sensitive wildlife habitat such as wetland areas, to minimize degradation of water quality in those special aquatic sites: In addition, the NPS should avoid the siting of any non-water dependent features such as marina stores, offices, storage facilities, living space, and etc. on the open waters of Lake Roosevelt and tributary streams, to minimize potential water quality degradation and the cumulative loss of aquatic habitat.

J

10) Environmental Consequences: Alternative 1, page 118: "The proposed action would affect mostly areas covered with Ponderosa pine, sagebrush, grasses and forbs. Impacts on vegetation would range for clearing and light excavation. . . ." As stated in our general comments above, we recommend that removal of native trees, shrubs, forbs, and grasses be minimized to the extent possible, unless associated with management plans devised to restore historic wildlife habitat values (such as control burning to reduce encroachment of understory vegetation in certain plant communities).

K

11) Environmental Consequences: Alternative 1, Wildlife, page 119: "The clearing of vegetation for new and expanded facilities would occur mostly near previously disturbed areas and displace any wildlife that inhabits these areas. Increased noise from heavy equipment. . . ." Please see our previous comments pertaining to removal of vegetation and disturbances to wildlife, including the avoidance of construction and maintenance activities during avian nesting season to prevent injury to nesting migratory birds protected under the Migratory Bird Treaty Act.

L

12) Environmental Consequences: Threatened and Endangered Species (T&E species): Bald Eagle, pages 119-120: "The new or expanded facilities or increased visitor use in the concentrated developed recreation management areas would not occur near known wintering or nesting areas." The proposed Kettle Falls marina site is within 1/2 mile of a known active bald eagle nest. Please see our comments # 15 through 17 below pertaining to the Kettle Falls Marina (Appendix D). We suggest that the NPS prepare nest management plans for each of the bald eagle and peregrine nest sites within or adjacent to the NRA, especially for the nest sites that are or may be subject to disturbance from recreational use.

M

13) Environmental Consequences: T&E Species: Bull Trout, page 120: "The managing agencies would also carry out appropriate mitigation to help protect bull trout." Details on these proposed mitigation plans should be disclosed in the DEIS.

H The text on threatened and endangered species on page 87, first column, in the draft plan, was changed in the final plan to "The Canada lynx (*felis lynx canadensis*), a proposed species for listing, may also occur in or near the national recreation area." Also, FR 1997 was replaced with USFWS 1998.

The text on page 87, second column, on the woodland caribou in the draft plan was changed in the final plan to: "to help bolster the existing remnant herd. The herd has been augmented as recently as 1998. However, it is unlikely that woodland caribou would be found in the immediate vicinity of the national recreation area."

I Spill prevention, control, and counter measures (SPCC) plans have been or will be prepared for fuel storage/distribution facilities within the national recreation area in accordance with 40 CFR 112.

The proposed action designates areas of the national recreation area as passive waters, where the National Park Service can restrict motorized boat use to protect sensitive wildlife habitat such as wetlands. The passive waters contain the largest wetland areas within the national recreation area. See table 1, pages 34-35 in the draft plan for the passive water management prescription. Also, see the maps on pages 36-37 for the location of these areas.

NPS management policies require that the siting of nonwater-dependent features on open water, streams, wetlands, and floodplains be avoided unless there are no practicable alternatives.

J The text on page 118, column 2, second full paragraph, in the draft was changed in the final plan to clarify the section: "The removal of native vegetation would be avoided whenever possible. However, the impacts of the proposed action on vegetation could ~~would~~ range from . . ."

Also, the following sentences were added to the end of that paragraph. "Impacts on vegetation would be minimized by careful site selection and design of new facilities. Disturbed areas would be revegetated with appropriate species for the location."

K The text on page 119, column 1, of the draft plan was changed in the final plan to clarify the section: "The clearing of vegetation for new or expanded facilities would occur near previously disturbed areas and displace any wildlife that inhabits these areas. However, the removal of native vegetation would be avoided whenever possible. Also, construction and vegetation maintenance activities would be avoided during avian nesting seasons whenever possible to help protect migratory birds."

COMMENTS

RESPONSES

N

14) Appendix D: Kettle Falls Marina relocation, page 161: "Efforts to locate a suitable deepwater moorage site have continued, and recently attention has focused on the feasibility of relocating some marina operations to the north of the existing campground." The proposed marina site is about 1/2 mile and in direct line of sight from an active bald eagle nest. Accepted bald eagle management guidelines recommend that no human disturbance occur within 1/4 mile of a nest site to maintain moderate to high quality habitat (Habitat Management Guidelines for Bald Eagles in Northwestern Montana, 1991). Impacts to bald eagle nesting and wintering habitat should be considered in the Biological Assessment prepared for proposed action.

O

15) Appendix D: Kettle Falls Marina, page 162: "The Kettle Falls marina houseboat operations including office, store, fueling, and boat (dry and wet) storage would be relocated to the proposed site north of the existing marina A new floating dock structure would include a \$25 square foot service building, a floating fuel dock, and houseboat operations." To minimize the individual and cumulative loss of aquatic habitat, and potential adverse impacts to water quality, non-water dependent facilities should be land based, such as office structures, stores, storage facilities, restrooms, and accommodations for marina staff.

P

16) Appendix D, page 163, Kettle Falls Marina, "Fuel:" "The fuel operation for the marina would be moved to the deepwater moorage site. The fuel tanks would be on a barge and floated along with the other marina facilities at the new moorage site." FWS recently reviewed and commented (by letter dated January 7, 1999) on a proposal to place a floating fuel barge at the existing marina site. In our letter, we stated our concern about potential water quality issues associated with the floating gas barge and requested that a SPCC be required whether the storage facility was land or water based. We also had concerns regarding the siting of non-water dependent facilities and subsequent loss of open water aquatic habitat in Lake Roosevelt/Columbia River. The applicant justified the water based siting due to the considerable distance that a "live" fuel line would have to extend from a land based fuel storage tank and a floating fuel pump (to dispense fuel to boats). Because the new marina location will be a deepwater moorage site (shorter fuel lines between shore and the dispensing pump), the need for a water based barge may not be justified.

Thank you for the opportunity to review and comment on the DEIS. Because you have already worked with our Moses Lake Field Office regarding section 7 consultation (Endangered Species Act) for this project, please contact Richard Smith at 509-765-6125 for questions concerning your Biological Assessment or other consultation matters. If you have any questions regarding FWS comments on the DEIS, please contact Rick Donaldson at 509-891-6839.

cc:
FWS-R1, DHC, Portland
FWS-Moses Lake
WDFW-Spokane

Also, the following new paragraph was added between the paragraph referenced above and the paragraph that followed it in the draft plan: "Impacts on wildlife would be mitigated by careful site planning and design. Sensitive species would be identified, and measures would be developed to avoid or minimize work-related impacts. Work would be scheduled to avoid sensitive periods such as nesting or fawning seasons."

- L The text on pages 119-20 in the draft plan has been revised in the final plan.
- M The managing agencies refers to those agencies that manage the fisheries. The National Park Service does not have any direct fisheries management authority on Lake Roosevelt, as noted on page 86 of the draft plan. For clarification, the text on page 120, column 1, of the draft plan was changed in the final plan to: "The managing agencies responsible for Lake Roosevelt fisheries management and the protection of bull trout would develop and carry out appropriate mitigation to help protect bull trout."
- N Additional NEPA compliance documents would be prepared to analyze site-specific impacts for natural and cultural resources before any construction activities began. Please see page 103 of the draft plan for additional discussion.
- O The Kettle Falls area has been occupied by humans for more than 9,000 years. It has a very high concentration of artifacts and other sensitive cultural resources including many burial sites. Before any construction begins, additional NEPA compliance would be completed to identify potential impacts and evaluate the tradeoffs between land- and water-based facilities.
- P If the Kettle Falls Marina is built, then a spill prevention, control, and counter measures plan will be prepared in accordance with 40 CFR 112. Also see responses N and O above.



THE CONFEDERATED TRIBES
of
THE COLVILLE RESERVATION
POST OFFICE BOX 150-NESPELEM WASHINGTON 99133 PHONE (509) 674-4711

RECEIVED
JAN 29 1999

OFFICE OF THE
TRIBAL HISTORIC PRESERVATION OFFICER
AND
HISTORY/ARCHAEOLOGY DEPARTMENT
L. R. N. R. A.

January 27, 1999

Superintendent Vaughn Baker
Lake Roosevelt National Recreation Area
1008 Crest Drive
Coulee Dam, WA 99116-1259

Re: Draft Environmental Management Plan Environmental Impact Statement – Lake Roosevelt National Recreation Area

Dear Superintendent Baker:

Enclosed are page by page comments to the above reference EIS that you should include in the process at this time.

However, there remain issues that require resolution between your agency and the Confederated Tribes of the Colville Reservation Tribal Historic Preservation Officer and the History/Archaeology Department. The following issues require discussion:

- A
 - There is no original document that transfers management responsibility from the Bureau of Reclamation to the National Park Service. Later agreements assume that the NPS has a legitimate management responsibility, but the original document placing NPS in a management role is missing. Without this original document, any subsequent agreements and plans are questionable.
- B
 - The proposed management plan would have an impact on the operation and planning of tribal management in the tribal portions of the reservoir shorelines, yet the tribes were not fully brought into the planning process. Successful management of the Grand Coulee Dam Project shorelines will require an integrated plan with the tribes being fully involved. A plan that only involves the NPS is inappropriate.

THE CONFEDERATED TRIBES OF THE COLVILLE RESERVATION

A The secretary of the interior assigned land management responsibilities for the national recreation area (recreation zone) to the National Park Service in the original 1946 Tri-Party Agreement and again in the 1990 "Lake Roosevelt Cooperative Management Agreement."

In a letter dated February 19, 1999, to the Chairman of the Colville Business Council, the acting regional director of the Bureau of Reclamation addressed this issue as follows:

The Lake Roosevelt Cooperative Management Agreement (Agreement) is explicit that NPS is the Federal Land Manager for the Recreation Zone, just as it is clear the Colville Confederated Tribes (CCT) are the Land Manager for their Reservation Zone. By signature of that Agreement, the Secretary of the Interior (Secretary) specifically delegated management of the Recreation Zone lands to NPS and restricted Reclamation's authority outside the Reclamation Zone to reservoir operations for authorized project purposes. Any other action by Reclamation in other zones must have the prior approval of the zone land manager. Perhaps some confusion exists about Reclamation's role in other management zones because Reclamation initiated the real estate actions for the land taken for the reservoir. In fact, the land belongs to the U.S. Government, not to Reclamation. The Secretary has delegated management functions through the Agreement to the cooperating managers. Another point of confusion appears to be that some of your staff view the Agreement as solely a recreation management document, and therefore interpret Reclamation to be responsible in all zones for non-recreation functions. The Agreement is a comprehensive land management document encompassing all functions, including cultural resource management and management of burial locations. Our interpretation is supported by an opinion from the Regional Solicitor, U.S. Department of the Interior.

As Federal Land Manager in the Recreation Zone, the National Park Service is responsible for implementation of all Federal laws on those lands and has oversight over all actions pursuant to those laws, as well as for departmental and NPS policy. This includes actions under the Native American Graves Protection and Repatriation Act (NAGPRA), the Archaeological Resources Protection Act (ARPA), the National Historic Preservation Act (NHPA), and the National Environmental Policy Act (NEPA). Reclamation cannot act to implement our own initiatives under those laws within the Recreation Zone without the knowledge and approval of the National Park Service.

COMMENTS

RESPONSES

C

- There is no evidence of compliance with the portion of NEPA that requires consideration of substantive environmental law, in this case, the National Historic Preservation Act. There has been no consultation with the Tribal Historic Preservation Officer of the Confederated Tribes of the Colville Reservation on the effects of this Environmental Impact Statement on cultural resources. Section 106 of the National Historic Preservation Act requires this consultation.

Because of the above issues, I am requesting that your agency enter into meaningful consultation with this office. Therefore, I am requesting an extension of the comment period on the Draft Environmental Impact Statement until such time as the above issues are addressed.

Sincerely,



Adeline Fredin
Tribal Historic Preservation Officer
Manager, History/Archaeology Department

Encl. Comments to the EIS

- B The Tribe was consulted throughout the development of the draft plan. Pursuant to direction of the Tribal Business Council, this consultation was coordinated through the director of the Tribal Parks and Recreation Department. It is regrettable that your concerns over NPS jurisdiction for cultural resources within the national recreation area prevented better coordination and consultation with your office during this process.

We agree that successful management of Lake Roosevelt requires an integrated plan with the tribes.

The general management plan is not a comprehensive plan for the whole reservoir. Similar to the Colville Tribes' *Shoreline Management Plan*, which addresses shoreline issues within the Colville Reservation, the general management plan only addresses the area within the national recreation area. What the National Park Service does and proposes will affect areas managed by the other managing entities and vice versa. The National Park Service fully intends to continue to consult with all of the other managing partners about any of its proposed actions so that the exact nature of potential impacts can be determined and mitigated before any proposal is implemented.

Please also see summary comment C for a discussion of how the National Park Service would propose that a lakewide visitor services and facilities plan be prepared.

- C Because the federal lands within the national recreation area fall outside the boundaries of the Colville Indian Reservation, the Washington state historic preservation officer has section 106 jurisdiction for the national recreation area. However, as a matter of policy and because the tribes are managing partners on Lake Roosevelt, the National Park Service consults with tribal historic preservation officers on matters affecting cultural resources. Please see response B above for further discussion.

COMMENTS

RESPONSES

Confederated Tribes of the Colville Reservation
Office of the Tribal Historic Preservation Officer
And
History/Archaeology Department

Comments to the Draft Environmental Management Plan
Environmental Impact Statement
Lake Roosevelt National Recreation Area

- D Page 13 – Desired Visitor Experiences – This section contains a number of references to cultural resources and their management. If the NPS has a role in management in the Lake Roosevelt NRA, it is in recreation management, not in cultural resources management. There is no document assigning the responsibility for cultural resources to the NPS.
- E Page 19 – Tribal Plans – “Although most lands within the national recreation area do not directly adjoin reservation lands and are not directly affected by tribal plans and policies...”. This statement appears to be false in general. In particular, the CCT has a Historic Property Management Plan for the entire Grand Coulee Dam Project.
- F Page 23 – Planning Assumptions – “...because it was directed to manage the area by acts of Congress...” This is not supported by the documentation presented in appendix G.
- G Page 24 – It would be appropriate to illustrate or describe what the NPS conceives of as its boundaries in the area defined as the “Recreation Zone” in the 1990 agreement.
- H Page 25 – Management Alternatives – There is no presentation of the “old plan” and the “new plan” and the differences between the two plans.
- I Page 26 – Third paragraph – A few visitors, particularly if they are relic collectors, can cause great damage to cultural resources. Furthermore, anticipated midsummer flow augmentation drawdowns will expose cultural resources at the height of the tourist season.
Page 26 – Fourth paragraph – This paragraph is badly written and difficult to understand.
- J Page 30 – Second paragraph – The total number of access points are important to recreation management of tribal lands. The number and placement of proposed access

- D Please see response A above.
- E The text on page 19 of the draft plan has been revised in the final plan.
- F Appendix G summarizes the various laws that are applicable to units of the national park system including Lake Roosevelt National Recreation Area. Please see also response A in this letter and summary comment D.
- G As described in the 1990 “Lake Roosevelt Cooperative Management Agreement,” the recreation zone includes those federal lands and waters outside of the reservation boundaries and the area immediately behind the Grand Coulee Dam. Please see appendix B of the draft plan.
- H The “old plan” is described in alternative 2, and the “new plan” is described in alternative 1. Please see the tables on pages 53-56 of the draft plan for a comparison of these alternatives.
- I You are correct. The text on page 26 of the draft has been revised in the final plan.
- J As noted in the referenced paragraph, there would be full consultation and public review on any proposed community access proposals. Please also see summary comment E.

COMMENTS

RESPONSES

	points should be done with the full participation of the tribes as an initial step in the process.
K	Page 30 – Fourth paragraph – “Sensitive natural and cultural resources would be protected and managed to ensure that they would not be adversely impacted by visitor use”. How would this be done? There has not been adequate protection in the past.
L	Page 30 and 31 NRA Operations – Budget and staffing are considerations that should be made in consultation with all participants in the management of the lands around the reservoir. Each entity has a stake in budget and staffing.
M	Page 32 – Fourth paragraph – There should be consideration of returning the lands mentioned to the tribes.
N	Pages 34 and 35 - By what authority does the NPS designate “Open Water” and “Passive Water”.
O	Page 53 through 56– The material presented in the charts is misleading. Alternative 1 will seriously increase the potential for impacts to cultural and natural resources by increasing visitation and facilities. Page 59 – Setting - This section is rather poorly written. Some attention needs to be given to the terms “lake” and “river” in this section. The use of the term “reservoir” is appropriate in places.
P	Page 60 – Regional Setting and Land Use Characteristics – There is no mention of aboriginal land use.
Q	Page 91 – First paragraph – The twelve tribes of the Confederated Tribes of the Colville Reservation occupied the lands from the crest of the Cascade Mountains to the present Washington-Idaho border and from interior British Columbia to the Snake River in Washington and the Willowa-Imnaha drainage in Northeastern Oregon.
R	Page 92 – The map presented on this page is not accurate. A better map is available at the History/Archaeology Department of the CCT.
S	Page 91 – 93 Archaeological Resources – This section is very poorly written and should be rewritten. It contains misleading and/or inaccurate statements that are much too general and lack proper citation.
T	Page 94 – Ethnographic Resources – the information that Traditional Cultural Properties are currently being documented by the CCT should be included in this section.
U	Page 94 – National Register Properties in the National Recreation Area – It should be mentioned that all inventoried historic properties (archaeological sites) must be managed

- K This paragraph outlines the goal for the management of cultural and natural resources under the proposed management plan. As part of its ongoing management of the national recreation area, the National Park Service, among other things, (1) prohibits off-road vehicle use on the drawdown; (2) in conjunction with both tribes patrols the lake during the drawdown to monitor for illegal activities that might harm sensitive cultural sites; (3) evaluates the potential impacts on cultural and natural resources on all projects that are proposed for the national recreation area; and (4) educates visitors about the importance of protecting both the cultural and natural resources of the area.
- L We agree. However, this needs to be a "two-way" street with all managing entities consulting with each other.
- M Disposal or exchange of public lands would be done pursuant to applicable laws and regulations.
- N The *Code of Federal Regulations* (36 CFR Part 3) is the authority. Where these areas adjoin tribal waters, such restrictions would be worked out jointly with the appropriate tribe.
- O Alternative 1 is designed to respond to increases in use that will occur whether the National Park Service and the other managing partners do anything or not. In general, visitation increases are tied to population increases of the region. Short of limiting use on a lakewide basis, the National Park Service is proposing to expand existing facilities where appropriate and direct use to lesser used facilities. Use limitations for specific facilities that have reached capacity would be implemented. You are correct that there could be additional impacts on cultural and natural resources as use increases. Alternative 1 proposes to deal with those impacts through more active visitor use management techniques, such as site design and maintenance and more personnel on site during high use periods. Should these not adequately address resource impacts, additional steps such as limiting use on portions or all of the lake could be considered. Such restrictions would be developed in full consultation with the managing partners, the general public, and other interested parties.
- P Aboriginal land use is discussed in the "Cultural Resources" section beginning on page 90 of the draft plan.

COMMENTS

RESPONSES

as if they are eligible for the National Register of Historic Places until such time as they are evaluated under the criteria of the National Register of Historic Places.

Page 105 – Second paragraph – There is no effective coordination and consultation now, how would there be less in the future?

V Page 105 through 107 – All of the issues discussed in these sections could cause direct and indirect impacts to cultural resources. This is not discussed.

W Page 108 – paragraph 5 – “It was determined that none of these actions would result in significant direct or indirect negative or adverse effects on any minority or low-income population or community”. This is untrue if all low-density and no development zone responsibilities rest with the tribes to ensure no overbuild of the project area.

Page 122 – Paragraph 3 - See second comment for page 94 above.

X Page 122 – Paragraph 4 – What ongoing dialogue with the tribes on cultural resources?

Y Page 122 – Paragraph 5 – There are over 400 documented ethnographic sites in the study area.

Page 122 – Last paragraph – The NPS should take into consideration the fact that most cultural resources are non-renewable while natural resources may be renewable.

Z Page 123 – Paragraph 3 – Decisions about monitoring should be made in consultation with the Tribal Historic Preservation Officers of the affected tribes, not solely by the NRA staff.

AA Page 124 – Paragraph 7 – It would be appropriate to identify the agencies and tribes that are accomplishing the survey, inventory and management of the cultural resources. It is not the NPS that is accomplishing this. Furthermore, there is a lack of cooperative and productive dialog.

BB Page 125 – Conclusion - The conclusions are erroneous. More visitors and more visitor facilities would create more impacts to cultural resources. The facilities and locations of concentration are already established in alternative 2. Alternative 1 would redistribute the visitors on the landscape and cause new facilities to be built, both of which could adversely effect cultural resources.

Page 129 – Unavoidable Adverse Impacts – Unavoidable adverse impacts resulting from the proposed action would also be to cultural resources. It must be remembered that most cultural resources are non-renewable and the preferred treatment of cultural resources is preservation in place whenever possible.

Q The text on page 91 of the draft plan has been revised in the final plan.

R The map used on page 92 of the draft plan was obtained from a tribal publication. If there is a need in the future for such a map, we will contact the Colville Tribe to obtain a more accurate version.

S The information in the "Affected Environment" section is intended to give a brief overview of the resources within and around the national recreation area. It is not a comprehensive discussion of the various resources -- that information is available from other sources. Please see the bibliography on pages 175-180 in the draft plan for the references cited in this section.

T The text on page 94 of the draft plan has been revised in the final plan.

U This section only describes the existing conditions. Please see changes to the text on page 17 of the draft.

V Impacts on cultural resources are discussed beginning on page 122 of the draft plan.

W We feel that this comment basically describes our proposed action. The plan proposes very few completely new developments. The proposed management areas have been defined and delineated to maintain the existing character of the area as much as possible. Most new development proposed is really an expansion or reuse of an existing facility. The purpose of the dispersed management area, which comprises almost 50% of the shoreline within the national recreation area, is to ensure that there will continue to be areas that are primarily natural and primitive and nature. Also, most of the area delineated within the developed recreation area would continue to be undeveloped, although there would be more flexibility in these areas to accommodate additional facilities should the need be identified.

The marina proposed for Crescent Bay would be a new development. There could also be some small new developments under the provisions for community access points; however, we do not anticipate that there would be very many of these and the land area involved would be relatively small.

X Please see response B in this letter.

COMMENTS

RESPONSES

CC

Page 132 – Native American Consultation – As mentioned before, there has been no consultation with the History/Archaeology Department or the Tribal Historic Preservation Officer of the CCT in the development of this EIS.

DD

Page 133 – A record of consultation with the Tribal Historic Preservation Officers of the CCT and the Spokane Tribe, the Advisory Council on Historic Preservation and the State Historic Preservation Officer is needed to demonstrate that this consultation actually took place.

EE

Page 136 – Paragraph 2 – Comments were not sought from the Tribal Historic Preservation Officer of the CCT.

FF

Page 136 – Paragraph 3 – No letter was received by Adeline Fredin about the commencement of the planning process.

GG

Page 137 – Paragraph 2 – Starred items – There is no history of the NRA staff working with the CCT on cultural resource management or cultural matters.

HH

Appendix A: Brief Administrative History – There is no record of the original authority for the NPS to permanently manage federal lands of the Grand Coulee Dam Project. Without the original authority, any subsequent agreements or other documents that place the NPS in a management role are based on an assumption that the NPS has the authority to be there.

Y The text on page 122 of the draft plan has been revised in the final plan.

Z We have and will continue to do so.

AA The text on page 124 of the draft plan has been revised in the final plan.

BB Please see response O in this letter.

CC Please see response B in this letter.

DD Such documentation is available at the park headquarters in Coulee Dam and is summarized in the revised "Consultation and Coordination" section in the final plan.

EE Our records show that a letter was sent to Tribal Historic Preservation Officer Adeline Fredin on July 30, 1997, requesting that this officer be involved in the development of the general management plan. Review copies of the preliminary draft were made available to the tribe for comment before publication. In addition, NPS staff met with tribal staff on March 17, 1999, to discuss the tribe's comment on the draft plan. Attempts to hold further meetings with the tribal historic preservation officer were either cancelled or postponed at the request of the officer. Please also see response B in this letter.

FF Our records show that a letter was sent to Tribal Historic Preservation Officer Adeline Fredin on July 30, 1997, requesting that this officer be involved in the development of the general management plan.

GG It is regrettable that the ongoing jurisdictional dispute has prevented better coordination and consultation with your office during this process. However, there is a record of past NPS consultation and coordination with the Tribe, and an ongoing record with regard to projects within the national recreation area.

HH Please see response A in this letter.

COMMENTS

RESPONSES



THE CONFEDERATED TRIBES
of
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RECEIVED
JAN 29 1999
L.R.N.R.A.

January 29, 1999

Vaughn Baker
Superintendent
Lake Roosevelt National Recreation Area
1008 Crest Drive
Coulee Dam, WA 99116-1259

Re: Draft General Management Plan/EIS Lake Roosevelt National Recreation Area

Dear Mr. Baker,

Enclosed are comments from the Confederated Tribes of the Colville Reservation on the Draft General Management Plan/EIS Lake Roosevelt National Recreation Area. Comments from the Tribes History & Archaeology Department will be submitted at a later date from the Tribes Historic Preservation Officer Adeline Fredin.

The Confederated Tribes of the Colville Reservation submits these comments as a co-manager with reserved rights on Lake Roosevelt.

The Colville Tribes participation in the EIS process should not be interpreted by the Federal agencies as a substitute for the on-going responsibilities of all Federal Agencies to continue with government-to-government consultations in the overall management of Lake Roosevelt in conformity with the Lake Roosevelt Cooperative Management Agreement and the Federal Government's trust responsibility to the Tribes.

By submitting comments and participating in the EIS process, the Colville Tribes do not concede that the National Park Service (NPS) is the appropriate Federal agency to lead or implement this planning effort, which directly impacts Tribal cultural and natural resources.

The Colville Tribes values its working relationship with the National Park Service and looks forward to continued cooperation in the management of Lake Roosevelt. We formally request a government-to-government meeting to discuss issues raised in these comments. Please coordinate this meeting with Mike Palmer, the appointed tribal delegate at 509-634-3147.

Sincerely,

Joe Pakootas
Joe Pakootas
Chairman
Colville Confederated Tribes

THE CONFEDERATED TRIBES OF THE COLVILLE RESERVATION

COMMENTS

RESPONSES

Comment from the Confederated Tribes of the Colville Reservation on the Draft General Management Plan/EIS for The Lake Roosevelt National Recreation Area

EIS

This plan appears to be a programmatic Environmental Impact Statement, meaning that this document intends to describe, analyze, etc., various options and impacts of overall NRA management. At a later date, more site-specific activities/projects will be further developed and analyzed and "tiered" to the subject plan. The draft management plan is overly vague, however, and needs a greater degree of specificity regarding the overall NRA management the NPS is proposing. Specific numbers of anticipated visitors and types of recreational use need to be quantified and then tied to specific numbers, types and location of facilities and development which will accommodate these projected increases in use. For example, how many campsites and/or facilities will be developed/augmented in the various proposed management zones - 10, 20, 40? Where will these sites be developed within a specific zone type? Without this structure and specific goal and objective setting, the overall plan is too vague to analyze impacts because impacts are difficult to assess when the type, number and locations of recreational uses and visitors have not been specified. This will also result in local projects being analyzed but not being looked at from the "big picture" because the programmatic document was supposed to address this but fell short, so the concept of tiering becomes questionable.

A

Alternatives

We would like to see more alternatives. As it stands, the Confederated Tribes of the Colville Indian Reservation (hereinafter referred to as the "Tribes") does not support Alternative 1. A low-growth, medium-growth and high-growth alternative would have given interested parties more choice to shape the future. A no-growth vs. growth alternative does not present a clear picture of how much growth and development we are endorsing if we were to support Alternative 1. Why were other alternatives not developed? Why was this not "feasible" (the reason given in the plan)? It appears that at least one other, more middle-of-the-road strategy would be possible, e.g. curtail further development on Spokane Arm, upgrade Kettle Falls facility, put in Crescent Bay Marina, instead of an all or nothing approach.

B

Additionally, it is required under the National Environmental Policy Act that specific explanations be given as to why various alternatives were or were not developed and why alternatives were dropped from further consideration.

We disagree that the "most significant impact" of implementation of Alternative 1 will be that the NPS will have more options to manage the NRA. Just as significant will be the

A See summary comment C.

B As explained in summary comment C, the proposals are purposefully general to allow management flexibility. The National Park Service felt that visitor growth is inevitable and that alternatives designed to limit or encourage it are not feasible. The proposal is designed to provide NPS management the flexibility that it needs to manage growth while minimizing adverse impacts on the environment and visitor experience. Please see the discussion on page 103 of the draft that explains how detailed impacts of future proposed actions would be analyzed at the appropriate time.

COMMENTS

RESPONSES

impact of more people recreating on the reservoir, particularly in reaches that currently receive little use. This is what the NPS is anticipating and trying to accommodate. More human activity and use begets impacts resulting from such use.

The assessment and analysis of impacts is weak and is partially tied to the unspecific nature of the plan (see EIS Section above). For example, under land use impacts with Alternative 1 (pg. 104), it is stated that developments would occur throughout the NRA over the life of the plan, resulting in additional open space being used for developed recreation. It is also stated that "the number and location of such changes in land use is not now known. However, given that the national recreational recreation area has some 300+ miles of shoreline, it is expected that the total area affected by development of additional facilities would be relatively small". It is difficult to substantiate such a conclusion if the number, location and types of recreational development are not specified. These sorts of conclusions exist throughout the Environmental Consequences section. It seems that other similar reservoir areas in the West, such as Lakes Mead and Powell, which have received increasing use over time could provide information and guidance on developing a programmatic plan and assessing the impacts of implementing such.

It is unclear why there would be less coordination with other management entities, e.g., Colville Tribes, under Alternative 1 (pg. 105 and other).

Land Use

Growth & Development

The plan states that the National Park Service will not develop more than 50% of its management area, leaving the other half relatively undeveloped. This sounds positive, but it does not take into account Tribal developments on the other side of the reservoir. How will NPS development affect future tribal development and overall congestion on the Lake? Additionally, how will growth from the NPS side impact usage of Tribal lands?

As previously mentioned in the Alternatives section, Alternative 1 does not present a clear picture of how much growth will be allowed. We can work to cap growth through permits and a reservation system, why don't we plan for it? Alternative 1 should present hard numbers of growth and increased visitor usage.

The Tribes do not endorse any new development on the NPS side of the reservoir, however we do support expansion of existing facilities, where needed. Any proposed expansion of boat launches, campsites, and other facilities should focus on keeping higher density visitor use in areas of existing high use, either by expanding current sites or by locating new development nearby, not in more isolated portions of the lake. This concept also applies to houseboats and other random-type shoreline camping. No new development should be proposed and no more use encouraged in at least some of these areas. Under this approach, people would have more camping room, could

C As you correctly point out, the general management plan is not a comprehensive plan for the whole reservoir. Similar to the Colville Tribes' Shoreline Management Plan, which addresses shoreline issues within the Colville Reservation, the general management plan only addresses the area within the national recreation area. What the National Park Service does and proposes will affect areas managed by the other managing entities and vice versa. The National Park Service fully intends to continue to consult with all of the other managing partners about any of its proposed actions so that the exact nature of potential impacts can be determined and mitigated before any proposal is implemented.

Please see summary comment C for a discussion of how the National Park Service would propose that a lakewide visitor services and facilities plan be prepared.

D We feel that this comment basically describes our proposed action. The plan proposes very few completely new developments. The proposed management areas have been defined and delineated to maintain the existing character of the area as much as possible. Most new development proposed is really an expansion or reuse of an existing facility. The purpose of the dispersed management area, which comprises almost 50% of the shoreline within the national recreation area, is to ensure that there will continue to be areas that are primarily natural and primitive and nature. Also, most of the area delineated within the developed recreation area would continue to be undeveloped, although there would be more flexibility in these areas to accommodate additional facilities should the need be identified.

The marina proposed for Crescent Bay would be a new development. There could also be some small new developments under the provisions for community access points; however, we do not anticipate that there would be very many of these and the land area involved would be relatively small.

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launch boats faster, etc., but certain stretches would still receive far less use, would be less impacted by people and would therefore be the most significant factor in helping to maintain the natural character and integrity of the area which is a goal of the management plan. Priorities need to be identified for improvements to existing facilities.

E The plan repeatedly makes reference to studies that will be conducted on specific areas to determine growth impacts and the feasibility of expansion or new sites. The Tribes needs to be included in these impact studies.

Maps

F The Tribes question the legitimacy of the maps presented in the plan. The maps show various levels of recreational management and uses. There are several instances where the maps don't reflect Alternative 1 or 2, or existing land use. For instance, on the West Side of Lake Roosevelt, north of the Colville Indian Reservation, a majority of the river to the Canadian boundary is designated as "Developed recreation." This is not reflected by current activities nor by the alternatives described. In short, the alternatives are not reflected in the maps.

There is a mistake on the map for Alternative 1. What will be the management zone for the area around Daisy and Gifford-Dispersed or Developed Recreation?

Docks/Ramps

The Tribes support extending the boat launches and expanding park areas to increase efficiency. First priority should be given to extending the existing boat launch ramps.

G We have concern about the safety and effectiveness of ramps during storms. Log booms or jetties should also be evaluated as a safety alternative. Additional ramps at existing sites should be looked at to reduce congestion. This would solve congestion problems during peak times and in storms when everyone is trying to get off the lake at the same time.

H We do not support the addition of any new community docks, especially in reaches of the lake that receive low recreational use at present. We did some measurements and found only a few areas where someone living close to the lake, would have to drive 20-30 miles to access a boat launch. What may be the real issue is not the number of launches but the amount of moorage available. If more moorage were available, it would be more convenient for local residents to use their boats on the lake. Additional moorage could be developed at existing launch sites.

E As stated in comment C above, the tribes would be consulted on all proposals for new facilities.

F The majority of the area mentioned was purposefully designated developed recreation in recognition of the growing number of homes and some businesses that are being developed on adjacent private lands in this area. This area is served by all-weather roads that parallel the shoreline and provide easy access to most locations. It is a very different character from many of the areas at the south end of the lake where road access is very limited. Please see the description of the developed recreation management area on pages 33 and 34 of the draft plan. Any developments within this area would be small scale and widely separated, so that most of that management area would still maintain a predominately natural character.

There was a mistake on one of the maps for alternative 1. The area north of Hunters to Daisy was shown as dispersed recreation. It should have been developed recreation. This map has been corrected in the final document.

G Most of our ramps already have log booms where feasible. Multiple ramps are generally not feasible. We have widened ramps to increase capacity in several locations, and will continue to evaluate ramps for that potential.

H See summary comment E.

COMMENTS

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Environmental

Air Resources

The plan describes various air pollution emissions, their potential affect to the environment, and states that "These short-term events affect visibility but have limited impact on other NRA resources". How has this been determined? Metals/organics pollution in the dust during the reservoir drawdowns is a concern. People do use the lake during the drawdown periods. Fishermen frequent the exposed sediments/beaches throughout the winter, spring and during summer drawdowns. An investigation of bed toxics/air pollution effects should be conducted.

Water/Water Quality

Point Source Pollution: The plan brushes over the magnitude of the historical pollution to the NRA from Canadian and US sources, it fails to even mention the millions of tons of toxic sediments in the Lake bed and the potentially harmful effects this may have to the ecology and the public in the "Issues and Concerns" section. The Water Resources Section does describe the pollutant sources and notes general improvements are being made, and that "monitoring will be continued to verify these improvements". NPS must take both financial and management responsibility to see that adequate monitoring is implemented. The Lake Roosevelt Water Quality Council has identified several study/monitoring needs that should be conducted to answer some of the questions about Lake Bed sediments, beach sand safety, fish tissue analysis and others.

Total Dissolved Gas (TDG): This has been a huge system-wide water quality problem in the US and Canada which directly negatively impacts the fishery in the NRA. Large water years can cause significant fish mortality from TDG (Scholz, 1997). The fishery is identified as one of the most important recreational resources in the NRA, and this problem is not addressed in the plan. This problem, as with most water quality problems are complex and inter-relate.

Lake Levels

In several areas of the plan, lake levels are mentioned as a problem with recreational facility maintenance, operation, and fisheries. To state that they are determined by other entities does not adequately address their negative environmental impacts to the NRA natural resources and recreation. We have often been puzzled as to why there is not an EIS on Grand Coulee operations.

Soils

Landslides, which have resulted from reservoir drawdowns and spring runoff have caused the shoreline to deteriorate causing potential harm to Tribal resources. Drawdowns should be kept at a minimum with slower gradual drawdown to reduce landslides and sediment. The protection of groundwater, wetlands, flood plain areas, is important to lake ecology and drawdown scenarios should be evaluated to protect these areas.

- I The particular problem described here is a legitimate concern; however, it is related to the operation of the reservoir and is not affected by anything proposed within this plan. The primary responsibility for addressing these concerns rests with other agencies. The National Park Service would certainly support and cooperate with such studies.
- J The National Park Service is certainly aware of and will continue to do its part to seek a successful resolution to this problem. However, the National Park Service is just one of many players involved in this process. We will continue to support lakewide efforts through the Lake Roosevelt Water Quality Council to develop and implement a water quality monitoring program.
- K See response to comment J above.
- L Lake levels are a continuing concern for the National Park Service. They do cause a significant impact on lake access and the management of facilities at certain times of the year. However, resolution of that problem is beyond the scope of this general management plan. The National Park Service does work with the reservoir operators to mitigate the problems as much as possible within the parameters of the Columbia River operation plans.
- M Landslides and erosion along the shoreline caused by varying lake levels definitely is a problem with the national recreation area. Please see response to comment L above.

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We believe there should be more thorough recommendations on improving erosion in the NRA and we suspect there may be significant negative impacts to the lake ecology.

Fish & Wildlife

Native Whitefish species include: Mountain Whitefish and some Pygmy Whitefish. Lake Whitefish, which are relatively abundant in Lake Roosevelt, are not native. Burbot and White Sturgeon populations have not been adequately assessed, therefore we do not agree that these populations have substantially declined in the past ten years. We believe that non-native species may not have displaced the native fish, although the available habitat may be impacted. A discussion should be included in the plan describing mitigation strategies including habitat enhancement, passage, artificial production, stock assessments, Kokonee and White Sturgeon projects currently underway in the NRA.

The Colville and Spokane Tribes, along with the State of Washington are conducting fishery management planning activities on Lake Roosevelt, with the Tribes as the lead agencies. Resident fish does not appear to be a high priority with the State. Anadromous fish appears to be their high priority. The Colville and Spokane Tribes have focused extensive effort in the management of the Lake Roosevelt fishery resources.

Threatened, endangered and rare species are of concern. Sockeye, Chinook, Steelhead and Bull Trout are threatened or endangered within the region and must be enhanced and returned.

The Columbian sharp-tailed grouse (*Tympanuchus phasianellus columbianus*) is a Category 2 candidate subspecies for listing under the Endangered Species Act and does occur due north of the NRA on the Colville Reservation, just a few air miles from the reservoir.

Although the linear nature of the NRA does limit the amount of land and subsequent terrestrial habitat for wildlife (pg. 84), it is very important habitat because it is adjacent to water, contains a greater diversity of vegetation due to the proximity of water, is low in elevation and provides open space in a region where much of the remaining open low elevation ground has been developed or will be developed as housing sites in the future.

For example, the Hellsgate Game Reserve on the Colville Reservation, which borders the NRA, is 100,000 acres in size and represents about one-sixth of the winter range aerially surveyed by the Tribe in a harsh winter when snow accumulations are high and deer are forced to lower elevations. The reserve typically contains 50-55% of all the deer surveyed Reservation-wide in a severe winter. Many of these animals are in the lowest portions of the reserve bordering the NRA (CCT, unpublished data). This high level of use is due to the prevalence of low elevation lands which have less snow,

- N The National Park Service does not have any direct fisheries management authority on Lake Roosevelt, as noted on page 86 of the draft document. Therefore, a discussion of fisheries mitigation strategies would be more appropriate in the resource management plans produced by the agencies that directly manage the NRA fisheries.
- O In 1996 the U.S. Fish and Wildlife Service revised their candidate species list to include only category 1 species. Therefore, there are no "category 2 candidate subspecies." See the *Federal Register* (vol. 61, No. 40, 7596-7612, February 28, 1996) for additional information. However, as noted on page 88 of the draft document, the state of Washington and the U.S. Fish and Wildlife Service have identified the Columbian sharp-tailed grouse as a species of concern.

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comparatively milder weather conditions due to elevation and the ameliorating effects of the reservoir, presence of palatable browse species, and a setting that is relatively free of human-caused disturbance.

Human activities can impact animals through four primary routes - exploitation, disturbance, habitat modification and pollution (Knight R.L. and D.N. Cole, 1995). The first two are direct impacts. Exploitation involves immediate death from hunting and other consumptive uses. Disturbance can be intentional (i.e., harassment) or unintentional. Activities such as photographing wildlife, bird watching, or simply hiking through an animal's territory can cause unintentional disturbance. Alternatively, habitat modification and pollution are indirect forms of impact. Recreationists can modify vegetation, soil, water and even microclimates, which in turn impact species dependent on these habitats. Wildlife are also indirectly affected when their habitats are contaminated with discarded human food or garbage such as fishing line and six-pack tops. These and other recreational impacts have the potential to increase mortality of wildlife, decrease reproduction and recruitment, affect species behavior and habitat use, decrease overall species fitness and shift species abundance and richness and subsequently the type and number of wildlife living in an area. Once again, it is very difficult to assess impacts when numbers, types and locations of current and proposed recreational use and development is not specifically laid out. It can, however, be predicted with a high degree of certainty that higher visitor numbers and more recreational use on Lake Roosevelt will result in more impacts to wildlife associated with this use along with the additional development designed to accommodate such.

P

Bald Eagle Nesting Overview

There are presently 21 known bald eagle (*Haliaeetus leucocephalus*) nesting territories on Lake Roosevelt (Murphy, 1998). The first surveyed nest territory on the reservoir was recorded in 1987. Since then, the number of territories have increased due to an expansion in both the local breeding population and monitoring efforts during the nesting period. A maximum of 15 territories have been occupied in any one year. Eleven nests occur on the Colville Reservation, one on the Spokane Reservation, and the remaining nine on the NRA.

Q

The reasons for this increase are threefold. First, there has been an expansion of the local breeding population, due in part to several years of good production which has apparently resulted in some portion of these young birds returning with mates and establishing territories. Second, there is both an excess of available nest habitat, particularly in certain reaches of the reservoir, and an abundant prey base. Finally, low levels of human disturbance, at least in some locales, make the lake attractive to breeding eagles. In addition, monitoring efforts have intensified, especially since 1990, so more is generally known about nesting activity on the reservoir, particularly on the Colville and Spokane Reservations.

Percent successful nests have fluctuated widely from 1987-1998, which is typical, and it is difficult to draw any conclusions based on this parameter. Average annual

P Alternative 1 is designed to respond to increases in use that will occur whether the National Park Service and the other managing partners do anything or not. In general, visitation increases are tied to population increases of the region. Short of limiting use on a lakewide basis, the National Park Service is proposing to expand existing facilities where appropriate and direct use to lesser used facilities. Use limitations for specific facilities that have reached capacity would be implemented. You are correct that there could be additional impacts on cultural and natural resources as use increases. Alternative 1 proposes to deal with those impacts through more active visitor use management techniques, such as site design and maintenance and more personnel on site during high use periods. Should these not adequately address resource impacts, additional steps such as limiting use on portions or all of the lake could be considered. Such restrictions would be developed in full consultation with the managing partners, the general public, and other interested parties.

Q The text on page 87 and 88 of the draft plan about bald eagles was changed in the final plan to: "More than 21 known bald eagle nests are in the vicinity and appear to be becoming more productive each year. A maximum of 15 territories have been occupied in any one year. Bald eagle habitat is usually associated with large bodies of water that provide an abundant source of food. There is an excess of habitat on certain reaches of the river and an abundant prey base. Eagles feed primarily on fish, water-fowl, . . ."

The text on page 119 of the draft plan concerning bald eagles was changed in the final plan to: "More than 200 bald eagles overwinter, and more than 21 nest sites have been identified in the Lake Roosevelt reservoir area."

Also, further down in that same paragraph the following changes were made: " The new or expanded facilities or increased visitor use in the concentrated and developed recreation management areas would not normally occur near known wintering or nesting areas. If eagles were present, the National Park Service would consult with the U.S. Fish and Wildlife Service to develop mitigation plans to minimize impacts on eagles. The cooperating agencies would also develop management plans that would identify carry out protection measures that would be implemented to protect habitat, such as closing occupied nesting areas to visitor use during the breeding season to reduce potential impacts. The vegetation management program would likely increase diversity and abundance of eagle prey as vegetation recovered over time to more natural conditions.

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productivity appears to be increasing since 1994 and is approaching the 1987 high of 2.00 birds. It should be noted, however, that the 1987 figure only reflects one territory whereas the later figures represent 8-15 occupied territories. In addition, 3 young were produced in at least one territory in 1994, 1995, 1997 and 1998, which inflated yearly means.

Statewide productivity rates for bald eagles are typically at or close to 1.00 young. Reproductive success of the Lake Roosevelt population reflects a relatively low level of human disturbance, an abundance of available nesting habitat and food sources, and a breeding population that is currently below saturation point. The NPS conclusion that eagle territories are becoming more productive each year is misleading (pg. 88). While productivity has ranged from an average of 1.5-1.9 eaglets per territory during the 5 years from 1994-1998, percent successful territories have ranged from 54-88% over the same period. So, while productivity was high, partially due to the presence of 3 young at some sites, not all territories produced young, e.g., only 54% and 57% in 1996 and 1998, respectively.

Bald Eagle Nesting Status on Reservoir

All evidence points to an expanding breeding population that is operating below ecological carrying capacity. How long this trend continues will depend primarily on four factors. First, like many areas in the American West, recreational use and residential and resort development are increasing in this part of Washington, particularly on Lake Roosevelt. The West is experiencing unprecedented population growth as people depart other areas to settle in this region (Knight 1998). Not only is the West the fastest growing region in America, it rivals the growth rate of Africa and exceeds that of Mexico.

Washington is no exception to this trend and is growing by 100,000 people a year. This situation is further exacerbated because Washington is the smallest western state with the second highest population, the lowest percentage of public land and consequently a far greater percentage of private land subject to development. Growth in the state is no longer concentrated west of the Cascades and in the Spokane/Coeur d'Alene area; it's spreading to more remote areas of eastern Washington, particularly the northeastern and northcentral portions of the state. Most counties here have not fully implemented the State Growth Management Act. Additionally, basic land use planning is virtually nonexistent in some cases, e.g., Ferry County, which borders a good portion of Lake Roosevelt, has no zoning laws. These changes in human densities coupled with little or no land use planning at the county level will continue to result in a loss of nesting habitat and increases in disturbance which will have a detrimental effect on productivity and population expansion in certain stretches of the reservoir.

Secondly, timber harvest in this part of Washington will continue to result in reduced average tree diameters over large expanses. This in turn means fewer large trees will be available over time for nesting, perching, roosting, et cetera. This trend will probably be most pronounced on private lands, some of which provide current or potential eagle

- R Pages 120 and 121 of the draft document addressed the cumulative effects of various land uses and the anticipated increase in human population in the region on wildlife, including bald eagles.

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habitat and will also have detrimental impacts on productivity and population expansion in some portions of the reservoir.

S

Thirdly, future hydropower operations in the Columbia basin designed to augment flows for Snake and lower Columbia River salmon have the potential to negatively impact the eagle prey base in Lake Roosevelt and Rufus Woods Lake. At present, changes in operations do not appear to have negatively affected eagle reproductive success. However, impacts to reservoir fisheries and the zooplankton base have not been fully assessed on either Lake Roosevelt or Rufus Woods Lake and whether a decrease in these fauna have occurred is not understood.

Because the eagle breeding population is below capacity, minor decreases in fisheries production related to flow augmentation measures would not necessarily be reflected in reproductive success. Chronic low-level decreases or acute, substantial drops in fish numbers have the potential to impact eagle food resources and consequentially breeding birds on either reservoir. If the system were to unravel ecologically, due to low resident fish productivity and entrainment of both fish and plankton, this would certainly have a negative impact to eagles on Lake Roosevelt. Such circumstances would also offset any supplements to the wild food base from hatchery fish.

T

Finally, the U.S. Fish and Wildlife Service is moving forward on the decision to "delist" the bald eagle and declare the species recovered from earlier declines. This will result in the eagles' removal from the list of federally threatened species and a consequent loss of protection under the Endangered Species Act (ESA). While nesting and wintering eagle populations have increased nationwide, dramatically so in some areas, e.g., western Washington, eagle habitat will no longer be afforded the regulatory protection and consideration it currently receives under the ESA.

It is disputable whether current population levels can be sustained, at least in some areas, if enforceable measures are no longer in place to promote the retention of large trees and visual buffers, protect prey bases and control disturbance levels. This will be especially true in popular scenic areas with expanding human densities and substantial amounts of private land, such as Lake Roosevelt. Washington State has a Bald Eagle Protection Act that requires that long-term management plans be developed for eagle nests and winter roosts occurring on private land. How long the State Act will remain in place if delisting occurs at the federal level is unknown, however it is certain that a loss of state regulatory protection of habitat on private land will result in a loss of such on parts of the reservoir.

Recreational Activities and Bald Eagles

Eagles can be actively and passively displaced from use areas as a result of recreational pursuits (Anthony R.G. et. al., 1995). An example of active displacement is when birds are disturbed or agitated to the point that they flush off a nest, food source, et cetera, due to nearby foot traffic. Sometimes flushing occurs multiple times due to repeated disturbance. Passive displacement involves birds using an area less or

- S The text on page 121 in the draft document was changed in the final plan to: "Damming the river also had major impacts on the native resident fish populations. Dam operations on the river would continue to negatively affect fish and wildlife, such as bald eagles, that feed on fish and other aquatic organisms."
- T The National Park Service will continue to informally consult with the U.S. Fish and Wildlife Service to develop conservation measures for protecting listed species within the national recreation area. The Park Service will take the necessary actions to ensure compliance with the Endangered Species Act. Regardless of the bald eagle's future status under the Endangered Species Act, the National Park Service would continue to protect bald eagles in accordance with NPS management policies.

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avoiding it completely, thus altering spatial use patterns, due to human-eagle encounters they are not comfortable with. In the Columbia River estuary, for example, eagles spent less time foraging and made fewer foraging attempts in response to an experimental disturbance, a stationary boat. The degree of displacement depends on several factors such as type and durations of disturbance, time of day, and habituation levels of individual birds.

Recreational activities have the potential to have deleterious impacts on eagle populations through reductions in survival, especially in the winter when birds are in an energy deficit, and through decreases in reproductive success. Sites that should be managed are nest territories, night roosts, foraging areas and perch sites. Measures can be employed to temporally and spatially restrict human activities and manage habitat to conceal activities from birds, where appropriate. These measures require knowledge of local bird use patterns, much of which is not known for Lake Roosevelt birds, e.g., agitation and flush distances for nesting pairs. Additionally, use restrictions must be enforced and at this time no management parties have been systematically monitoring eagle use in regards to recreational activities on a regular basis. The Colville Tribe does not have the staff at this time to close the 11 lake nesting areas on the Colville Reservation to visitor use and enforce such, as stated on page 120. Alternatively, if visitor use is not promoted in certain portions of the reservoir, as recommended earlier, management of eagle use areas in those stretches may not require such intensive approaches.

Management plans have been effectively used to provide recommendations for management of habitat, eagle populations and human activities. When nest sites are numerous or winter populations are large and widely distributed, plans should provide a regional perspective. Management plans require the cooperation of all parties involved to protect habitat and reduce the effects of recreation on eagle populations. Proposed NPS development will have to be better specified than it is now in order to do this.

Vegetation

Various aquatic plants and noxious weeds have been introduced to the reservoir through various practices such as agriculture, logging, development and recreation. We recommend the NPS manage the Shoreline in accordance with the Tribes' Shoreline Management Plan.

Cultural Resources*

**The majority of comments and information on Tribal cultural resources will be submitted at a later date from the Tribes History and Archaeology Department Historic Preservation Officer, Adeline Fredin.*

More accurate information is needed relative to the background of Lake Roosevelt as to how the management issue was initially signed-off by the Secretary of the Interior and the NPS without consultation of the Tribes in the initial flooding of the landbase. After

- U The National Park Service will continue to informally consult with the U.S. Fish and Wildlife Service to develop conservation measures for protecting listed species within the national recreation area. The Park Service will take the necessary actions to ensure compliance with the Endangered Species Act. Also, the text on page 120 of the draft plan was changed in the final plan.
- V The National Park Service does have an active program to address terrestrial noxious weeds and forest health concerns. However this program is often constrained by the availability of sufficient funding.
- As far as the recommendation to manage the shoreline in accordance with the Tribes' *Shoreline Management Plan*, it is certainly our intent to be compatible to the degree possible. However, it should also be noted that the National Park Service does not have the same authorities that the Tribes have within the reservation boundaries to manage adjacent lands. Therefore, our ability to control noxious weeds, for example, is limited not only by funding but also by the land base we manage.
- W See responses to the previous January 27, 1999, letter from the Colville Tribe.

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the fact the Tribes were consulted as to the 1310 issues and cultural concerns, resource management, and water quality-quantity. The many burial sites underwater, cultural/spiritual sites must be preserved and protected from curious visitors. Cultural and natural resources are one in the same for the Colville Tribal membership, there must be monitoring and funding to preserve and protect what the Tribes have left.

Tribal Regulations

Reference to regulations or law should also include adherence to the Tribal Law and Order Code. Throughout the plan there are several references to the recognition and adherence to State fish and wildlife laws. As described in the "Cooperative Management Agreement", the Tribes have certain management/jurisdiction, especially in the areas of natural resource management, therefore, Tribal law should be added when recognizing State law.

Specific tribal regulations under the Tribal Code directly pertaining to Lake Roosevelt include the following.

Title IV – Fish, Wildlife, Camping, Boating, Off Road Vehicle Regulations

Tribal Land Use and Development Code

Shoreline Management Plan and Development Regulations

The Tribal Shoreline Management Plan is effective February 1, 1999 under Tribal law and was adopted to manage and protect important Tribal natural and traditional resources.

Colville Confederated Tribes-State of Washington 1982 Fish & Wildlife Agreement

Concessions Management Plan

The plan does not take into consideration the potential growth/development areas in the Concessions Management Plan.

Staffing/Budgeting

Although the NPS has been active in working with other agencies on certain resource management issues, the statement on Page VI states that in coordination with other agencies they work "protect the resources of the area as much as possible". With the current staffing in the NRA this has been inadequate. Various point and non-point water quality problems, lake level fluctuations, all have adversely affected the natural resources of Lake Roosevelt in the past and will more than likely in the future with either Alternative 1 or Alternative 2. There is one wildlife biologist for the entire NRA, this is inadequate, with all the water quality problems in the NRA, there is a need for resource professionals.

- X The text on page 169 of the draft plan has been revised in the final plan to clarify that those portions of Lake Roosevelt within the boundaries of the Colville and Spokane Reservations are subject to applicable tribal laws and regulations.
- Y We agree that additional resources are needed to address the issues that you have identified. We have requested additional funding to support both our visitor services and resource management capabilities. Decisions as to how much we receive in response to identified needs is made through the federal budget process, which is beyond the scope of this document.

X

Y

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The proposed plan to increase visitors and recreation would impact the Tribes Resource Programs. The Tribes would have to increase enforcement officers on the land and in the water to accommodate the health and safety of the increased visitors and recreation. Therefore the Tribes will request additional funding for enforcement of Tribal Law.

More activity on the reservoir would also create more usage and degradation of Tribal recreation areas. The Tribes therefore request additional funds for park improvements and maintenance.

Z During field site visits between the NPS and Tribal Parks & Recreation staff, specific Tribal park areas such as Rogers Bar were identified as areas that may be negatively impacted by growth.

AA Finally, the Tribes suggest stationing the NPS Lake Headquarters at Kettle Falls with branch quarters at Spring Canyon.

Z We will continue to involve the tribes in our project planning process so that impacts to areas such as Rogers Bar are identified and addressed. Please also see responses A and C above.

AA (Note: Although the comment refers to Kettle Falls, in meetings with the tribe, it was clarified that they meant Keller Ferry and not Kettle Falls.) We understand from discussions with tribal staff that the suggestion was that our headquarters be relocated to Keller Ferry. While we recognize that Keller Ferry is a major center of activity during the summer, it does not have the infrastructure to support our administrative offices. Nor could we justify that from a fiscal standpoint. Upon further clarification from tribal staff, we understand the issue to be the need to have more of a presence at Keller Ferry and other high use areas during the primary visitor season. Within the limitations of funding, we are committed to doing that.

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COMMENTS

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To: Baker, Vaughn
Priority: Normal
Subject: STI comments on the draft GMP

Comments made at Feb 3 meeting with the Tribe

- A P. 122 Cultural resource impacts — Discuss that settlement occurred along the river and that burial and sacred sites were up on the benches (now the areas exposed by the drawdown)
- B P. 123 Would like to see more specific discussion of tribal involvement in cultural res. mgmt. (next to last paragraph, 2nd column)
- C P. ?? — Implementation of passive waters on Spokane Arm, to be implemented in coordination with STI (signing, etc.)
- D P. 27 Camping/hunting and fishing. Explain that Tribes have their own regulations for these -- appendix F, p. 169

Other issues
— anchoring of boats, specifically houseboats, damage to archeological sites
— PWCs — identify buffer zone along shoreline to reduce speed, resource damage, conflicts with other users

THE COLVILLE TRIBE

- A The text on page 122 of the draft plan has been revised in the final plan.
- B The text on page 123 of the draft plan has been revised in the final plan.
- C The text on page 27, boating, of the draft plan has been revised in the final plan.
- D The text on page 169, appendix F, in the draft plan has been revised in the final plan.



LINCOLN COUNTY, WASHINGTON
PO Box 28 - DAVENPORT, WASHINGTON 99122
OFFICE PHONE: (509) 725-3331 - FAX: (509) 725-2034
Regular Meetings First & Third Monday of Each Month

February 8, 1999

Vaughn L. Baker
National Park Service
1008 Crest Drive
Coulee Dam, WA 99116-1259

RE: Lake Roosevelt GMP

Dear Vaughn,

RECEIVED
FEB 09 1999

Thank you for the extension period for comments on the draft GMP. I feel that the work that we have all done on the GMP over the last two years has gone a long way toward satisfying the needs of our local residents, while insuring that this wonderful resource will remain a beautiful place to visit and recreate. Lincoln County would like to go on record in support of Option #1, but with some modifications.

A

The biggest flaw to the draft plan as it is currently written, is the disregard for the rights of agricultural interests in general and cattle grazing in particular. On page 17 of the plan, grazing is simply disregarded as an untenable activity on public lands. The current NPS position, as reflected in the 1990 Special Park Use Management Plan, is that it does not have the authority to permit grazing or other agricultural uses on public lands. If this is true, how could the NPS advertise for a lease of land for agricultural purposes on another piece of their managed land? See the want ads of the Capital Press, November 29, 1998. That add reads in part, as follows: "The National Park Service proposes to lease approximately seventy-four (74) acres of land with the boundaries of the James Cant Ranch Historical District, John Day Fossil Beds National Monument, near Dayville, Oregon; at sections 6; 7, and 18 T. 12S, R26E, Grant County, Oregon, for the purpose of production and harvest of hay. The lease will be for a period of eight years. The lease will be awarded to the highest offer over the established fair market value of \$20 per ton... It is obvious that this add is for a lease of public lands for agricultural purposes. If this type of use can be authorized on one piece of NPS managed property, then why is it not authorized on another? It appears that the NPS has forgotten that agriculture was one of the explicit purposes of the original Lake Roosevelt project. The original project was authorized by Congress for the expressed purposes of production of electricity, agriculture and recreation. When exactly was that mandate of Congress superseded? Certainly not by the 1990 Special Park Use Management Plan, which was an agreement signed the Secretary of the Interior and four of its sub-agencies. An agreement which failed to follow either SEPA or NEPA guidelines. This plan needs to make a better effort of addressing this issue! This problem is not going away and neither are the farmers and ranchers along the river.

B

The DEIS contains no analysis of the impacts on small entities (such as ranchers and farmers) as is required by the Regulatory Flexibility Act and the Small Business Regulatory Enforcement Fairness Act (5 USC 601 et seq.).

IRWIN W. "BILL" GRAEDEL
Commissioner District No. 1
Davenport, Washington 99129

DEBIL D. BULENUS
Commissioner District No. 2
Reardan, Washington 99129

TED HOPKINS
Commissioner District No. 3
Creston, Washington 99117

SHELLY JOHNSON
Clark of the Board
Davenport, Washington 99122

LINCOLN COUNTY COMMISSIONERS

- A See summary comment A.
- B The general management plan is not proposing any changes in existing law, regulation, or policy with regard to grazing or other agricultural uses on public lands (see also summary comment A). Therefore, an analysis of impacts on small entities such as ranchers and farmers with regard to these issues is not required.

COMMENTS

RESPONSES

C

We need to better define the procedures for community access points (CAP). As we worked our way through the development of this plan, it was my understanding that each CAP would be evaluated on its own merit. Our verbal agreement was that all entities (private property owners, local government, NPS) had to agree before any new facilities would be constructed. I understood that once it was decided that a particular site warranted a CAP, each entity would cooperate in the effort. Local government might help with roads or parking (if applicable), local property owners might allow public facilities on their private land, and the NPS would provide other support and management of the site. At no time in our discussions did I understand that the total financial burden was being placed on any one entity. I further understood that if private property owners provided any facilities, such as docks, they could be constructed to a reasonable standard. As the current draft is written, there exists a certain level of apprehension on the part of many adjacent property owners. If this plan is to work, we need to make a better effort on this subject.

D

Option one of the draft plan makes good headway in solving many of the encroachment issues that have existed for years. However, it appears that we have a difference of understanding of what "trespass" means. On page 32, the draft plan states: "Boundary adjustments would not be used to resolve incidents of trespass on public lands." In discussing this issue, I refer to recent correspondence between your office and Mr. Chuck Booth, of Davenport. It appears that Mr. Booth's situation resulted from a faulty or inaccurate survey sometime before his cabin was built and many years before he purchased it. NPS personnel were at the site numerous times during the construction of the cabin. Sometime later, a more accurate survey was conducted and it was determined that the cabin was actually slightly on NPS property. Is this trespass? I hold that it is not and the "boundary adjustment" provisions of the draft plan were designed for and should be used for this and other similar situations. As in other situations, it is imperative that each situation be evaluated on its own merit! Mr. Booth is certainly not at fault in this particular case and I feel certain that we will find other cases where it is in the best interest of everyone, including the public, to settle the issue through a boundary adjustment.

There are several other issues that need some fine tuning, such as lake access from adjacent private land, weed control and fire danger. I feel that we can work through all of these issues if you will hold more meetings with our planning partners. We have the framework of a workable plan, and I hope that we won't let these few last details stand in our way. I look forward to our next meeting.

Respectfully,

Ted Hopkins
 Ted Hopkins, Chairman
 Lincoln County Board of Commissioners

c.c. Keith Green, LRPOA
 Charles Booth
 Penny Rosenberg

L.H.C. 1/19/2

C See summary comment G

D The text (pages 31-32 in the draft) has been revised in the final plan to address situations such as those cited in your letter.

COMMENTS

RESPONSES

FRAN BESSERMIN
DISTRICT NO. 1

VICKIE L. STRONG
DISTRICT NO. 2

FRED LOTZE
DISTRICT NO. 3



POLLY COLEMAN
CLERK OF THE BOARD
NETTIE EARNHART
ASSISTANT CLERK

STEVENS COUNTY COMMISSIONERS

AND
BOARD OF EQUALIZATION
215 SOUTH OAK, ROOM 214
COLVILLE, WASHINGTON 99114-2861
PHONE (509) 684-3751
FAX (509) 684-8316

RECEIVED
FEB 08 1999
L.R.N.R.A.

February 4, 1999

Mr. Vaughn Baker, Superintendent
National Park Service
1008 Crest Drive
Coulee Dam, WA 99116-1259

Dear Mr. Baker:

Thank you for granting our request to extend the comment period for the Lake Roosevelt National Recreation Area, Draft General Management Plan (GMP)/ Environment Impact Statement (EIS).

Following our review of the proposed management plan, we wish to make our suggestions and questions part of the record. In short, we feel the Draft GMP and EIS must address multiple uses of Lake Roosevelt and the surrounding area.

A On the outset, we would like to express our tentative support in endorsing the concepts of Alternative #1. We feel that the Draft EIS and GMP fairly addressed the concept of community access points. However, we would prefer seeing a more detailed explanation as to how this concept is supported by existing Congressional authorization. We thank you and your staff for taking the time and making efforts to work with the counties to jointly address public access issues to the recreation area commonly known as the "reservoir".

B We also must express disappointment that the plan did not address the feasibility of a more intense use of docks for commercial based facilities. How would a small dock based concession system on the lake effect the area?

C We were also very disappointed by the way the GMP and EIS quickly dismissed lawns, agriculture, grazing, resource management and private public access to the lake as being outside the scope of the GMP. We would like to know more clearly why our issues are not required to be addressed within the scope of the EIS and GMP. By not addressing our issues, the GMP does not address the impact that NPS actions will have on farming and ranching operations on lands adjoining Lake Roosevelt, and thus the economic impact to the county as required under the Regulatory Flexibility Act. If the NPS is seeking to eliminate

STEVENS COUNTY COMMISSIONERS

- A See summary comments F and G.
- B The draft plan did address this on page 33 under the description of developed recreation areas. Some small commercial facilities, such as courtesy docks for lakeside access to restaurants, stores, or wineries could be allowed if located in areas that did not detract from other recreation uses or interfere with reservoir management. The need for additional commercial facilities will be addressed when the lakewide *Concessions Management Plan* is updated. The current plan runs through January 1, 2001.
- C See summary comment A. Also, the general management plan is not proposing any changes in existing law, regulation, or policy with regard to grazing or other agricultural uses on public lands. Therefore, an analysis of impacts on small entities such as ranchers and farmers with regard to these issues is not required.

COMMENTS

RESPONSES

Baker/Page 2 of 2
2-4-99

C

agricultural permits or historic activities within Stevens County, both the county and its residents will be adversely impacted.

We would like to remind you that the creation of Coulee Dam was intended to benefit the adjacent lands. The EIS clearly confirms it was the goal and purpose of the project to obtain only those lands necessary to create the reservoir and by obtaining only those lands, it was determined that this action would allow the operation of the reservoir without adversely impacting adjacent landowners. Please explain why this determination changed? What laws have changed that would lead one to believe these original goals, which are consistent with the purposes of obtaining reservoir lands under Appendix J, are no longer valid?

D

There seems to be many issues supporting the goal of not impacting adjacent landowners. Until recently, no documents have specifically addressed or implied jurisdiction on private lands acquired for the project, except for reservation lands. All prior administrative documents and agreements noted in the EIS and GMP specifically refer to reservation lands or the reservoir area up to the high water mark as being the area of jurisdiction or area within the scope of the project. Even as late as 1990, Appendix B-Lake Roosevelt Cooperative Management Agreement lists the high water mark as being under the concurrent jurisdiction of the federal agencies and does not identify or note the land above the high water mark. It seems as though the federal agencies need some further direction from Congress as to how to manage lands outside of the reservoir area.

In addition to this response, the Board has received a motion from the Stevens County Federal Lands Advisory Committee (FLAC). As an advisory committee to the Board, we also submit their motion for the record.

Sincerely,

BOARD OF COUNTY COMMISSIONERS
OF STEVENS COUNTY, WASHINGTON

[Signature]
Chairman

[Signature]
Commissioner

[Signature]
Commissioner

BOCC:lme
Enclosure (1)
cc: FLAC
Stevens County Planning

D The recreation zone, as identified in the 1990 "Lake Roosevelt Cooperative Management Agreement," includes the surface of Lake Roosevelt up to elevation 1,290 msl and all freeboard lands (lands acquired by the federal government for the Coulee Dam project) above 1,290 msl outside the boundaries of the reservation and reclamation zones (provision IV. B). Because of the way the lands were acquired (see page 31 of the draft plan), the boundary line in many instances is very irregular. The secretary of the interior has designated the National Park Service as the manager of the federal lands within the recreation zone and directed that these lands be managed as a unit of the national park system (provision IV.D.2).

COMMENTS

RESPONSES

Federal Lands Advisory Committee
January 21, 1999

At a regular meeting of the Stevens County Federal Lands Advisory Committee, the following motion was introduced and unanimously accepted by the committee:

Mr. Brett Winterowd moved that the Federal Lands Advisory Committee support Alternative #1 of the National Park Service Draft Management Plan and Environmental Impact Statement for Lake Roosevelt.

However, we are concerned about the Park Service position on grazing, agriculture and resource management. We strongly disagree with the findings from the Superintendent of the Lake Roosevelt National Recreation Area on the matter of grazing and other agricultural uses. We believe that the finding "...uses such as grazing and agriculture may even be in conflict with the express purposes of a recreation area," is unfounded.

It is because of grazing and agriculture that the recreation area maintains visual aesthetics and offers a quality recreational experience. If grazing and agriculture are removed from the surrounding Lake Roosevelt area, the void will be filled with subdivisions and building lots. This will increase conflicts such as boundary issues, noise complaints, access to views of the lake, access to the lake, the need for further law enforcement, land management planning, erosion, pollution and traffic flow problems, to name just a few.

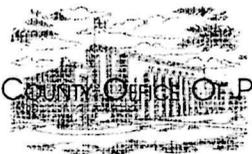
The assumption that range livestock will exceed water quality standards is not supported. Only in confinement situations (i.e., feed lots) is the potential runoff a valid issue, thus, the incidental use by livestock would pose no serious health threat. In fact, any conflict involving livestock can be easily handled with a variety of management options which are available, such as upland water developments.

In addition, the Lake Roosevelt National Recreation Area needs to address vegetation management in a responsible way. The potential threat of insects, disease, fire, noxious weeds and soil erosion are all very real concerns. The Park Service needs to reach out to local consultants to find ways to manage the National Recreation Area so it can maintain healthy, stable plant communities and soil cover. The National Recreation Area Plan does mention fire as a possible tool, however, prescribed burning exposes soil-- and exposed soil is at risk to the erosion process. With proper timber and grazing management, better results can be obtained. Logging and grazing do not expose the soil and will mimic the effect that fire can have with less risk to the environment. The Lake Roosevelt National Recreation Area needs to address these land management issues and take a productive role in good land stewardship to insure the safety and enjoyment of this important resource.

Mr. Lloyd McGee seconded the motion. Motion passed unanimously.

COMMENTS

RESPONSES


 STEVENS COUNTY OFFICE OF PLANNING

February 12, 1999

Superintendent, Baker
1008 Crest Drive
Coulee Dam, WA 99116-1259

RECEIVED
FEB 18 1999
L.R.N.R.A.

In reply to: EIS for the Lake Roosevelt; Draft General Management Plan

Dear Superintendent Baker,

I have reviewed the proposed Draft General Management Plan (GMP/EIS) and wish to make the following comments, suggestions and questions part of the record. As you know I participated in most of the planning meetings for the Stevens County Commissioners. During those meetings I as well as the other Counties were led to believe that our issues

A would be fully addressed. I'm very disappointed by the way the GMP/EIS quickly dismissed our issues such as lawns, agriculture, grazing and private public access to the lake

B as being outside the scope of the GMP. I also regret the Counties were not giving an agency role by being invited to all of the meetings involving the general direction and development of this draft plan. I had hoped that we could have developed a joint planning document that would have been the bases of a multi-jurisdictional agreement for all involved. However, I do appreciate the limited scope or role I was permitted.

C While I tentatively support and endorse the community accesses concepts of alternative # 1. I feel the Draft EIS requires a more detailed explanation as to how this concept is supported by existing congressional authorization. The fact the document states that "no changes in management or activities without specific authorization from Congress" may occur makes this request necessary.

I also believe your NEPA process requires you to fully address the following issues:

D What jurisdictional agency's are within the scope of the project area? Which map is to be used to depict the area of jurisdiction? The plan is not clear as to what areas are subject to each of the acts noted. What acts apply to which areas? Are some of the acts of congress limited to defined areas? What is your proposed mitigation to the economic impact the proposed plan will have on adjacent lands? What is the specific jurisdictional time line and laws applicable to the reservoir area? I ask this because, its my understanding that each and every act of congress applied to specific defined areas, each having a specific stated purpose. Is the EIS not required to express these facts?

MAILING ADDRESS: 215 S. OAK STREET - COURTHOUSE ANNEX
COVILLE, WA 99114

PHONE: (509) 684-2401
FAX: (509) 684-8506

STREET ADDRESS: 200 S. OAK - COURTHOUSE ANNEX
COVILLE, WA 99114

STEVENS COUNTY OFFICE OF PLANNING

A Issues such as private uses of public lands (lawns, agriculture, grazing, private access) were identified as being beyond the scope of the *General Management Plan* because they would require legislation to modify the existing authorities of the secretary of the interior as delegated to the National Park Service for managing the national recreation area. Because the *General Management Plan* is an administrative document that outlines how the National Park Service would manage an area within existing laws and regulations, these issues are considered to be beyond the scope of the plan. This does not diminish the importance of these issues to the people that raised them; it is an acknowledgment that the National Park Service does not have the authority to approve such changes in management or activities without specific authorization from Congress. These issues will be identified as having been raised during the planning process for consideration by the appropriate decision makers.

B See summary comment B

C See summary comment F.

D The recreation zone, as identified in the 1990 "Lake Roosevelt Cooperative Management Agreement," includes the surface of Lake Roosevelt up to elevation 1,290 msl and all freeboard lands (lands acquired by the federal government for the Coulee Dam project) above 1,290 msl outside the boundaries of the reservation and reclamation zones (provision IV. B). Because of the way the lands were acquired (see page 31 of the draft plan), the boundary line in many instances is very irregular. The secretary of the interior has designated the National Park Service as the manager of the federal lands within the recreation zone and directed that these lands be managed as a unit of the national park system (provision IV.D.2).

COMMENTS

RESPONSES

• Page 2

February 12, 1999

E

I have yet to fully understand how the current laws or authorizations of Congress permits you to state that our issues noted above are outside of the scope of the EIS requirements. I would think the only way you could make such a determination is if! a.) The Federal Government really did not have legal jurisdiction over the area and thus was not a lead agency under NEPA on lands above the high water mark. Or b.) The land is really not subject to this plan and is just missed identified in the plan and on the maps.

F

I would like to understand more clearly. Why our issues are not required to be addressed within the scope of this EIS/GMP? What will the implementation impacts of the GMP be or the impacts of its required actions be on farming and ranching operations and other permitted existing developments? Especially on those lands adjoining Lake Roosevelt and thus the economic impact to the County. Does the Regulatory Flexibility Act require these issues to be addressed?

In short, if the NPS is seeking to eliminate agricultural permits or historic activities within Stevens County both the county and its residents will be adversely impacted. The EIS/GMP does not address or mitigate these impacts or potential impacts. It's my understanding that the agency claiming lead status in the EIS process is required to develop the proper findings of fact including addressing past findings of fact and determinations. Is this not correct?

G

As far as I can tell from reading the plan, I understand the reservoir lands were authorized to be obtained under the Coulee Dam Act. Lands other than the reservoir lands seem to have been authorized by other acts and approvals of congress. The EIS is not clear on this issue. Is this correct? The plan is very clear in stating the creation of Coulee Dam was intended to benefit adjacent lands. The EIS clearly confirms it was the goal and purpose of the Coulee Dam project to obtain only those lands necessary to create the reservoir and by obtaining only these lands it was determined that this action would allow the operation of the reservoir without adversely impacting adjacent landowners. Is this statement in the plan correct? Where did this statement come from? It appears that a prior finding of fact exist. How come this finding of fact as referenced in the EIS is not valid today? What changed? Did congress make a change? The EIS is clear that NO changes in the management or activities can take place without the specific authorization of congress. Is this a true statement in the EIS or not? If so what has changed? I do not believe the State of Washington changed its ceded jurisdiction or it's expressly reserved jurisdiction and authority over land acquired or to be acquired.

The plan addresses many acts and documents as though they give authority to change, limit or otherwise manage areas above the high water mark of the lake. Its not clear but it appears the General Authorities Act of 1970 seems to be the main document used to implement the many park related acts that are used to limit or other wise address land uses. The 1970 Act states on page 170 that "any area of land and water now or hereafter administered by the Secretary of the Interior through the National Park Service for park, monument, historic, parkway, recreational, or other purposes" are a part of the park system. Is the 1970 Act why we see the Redwood Act, Organic Act and others being used as the legal framework to manage the reservoir area? If this is true, I'm really confused, as

E See response A in this letter.

F The *General Management Plan* is not proposing any changes in existing law, regulation, or policy with regard to grazing or other agricultural uses on public lands (see also summary comment A). Therefore, an analysis of impacts on small entities such as ranchers and farmers with regard to these issues is not required.

G See summary comment D.

COMMENTS

RESPONSES

• Page 3

February 12, 1999

H

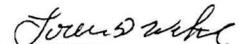
are many others. The 1990 Act as noted on page 170 states that such areas may only be administered in accordance with the provisions of any statute made specifically applicable to that area". I understand the Washington State statute (appendix j:) is specifically applicable to this area and that it is in conflict with this plan's stated authority and area of applicability? It's my understanding that a law is or may be void if it's in conflict with existing general legislation. Is this true? If my understandings are correct we may know why the agency agreements in both 1946 and as late as 1990 as noted in the GMP only addressed lands that were owned prior to the project by the federal government, and the reservoir area up to the high water mark.

I

Based on the facts contained in the EIS/GMP the document may only be internally consistent with its stated facts if the Federal Government does not own or have jurisdiction over the reservoir lands above the high water mark. If this were true my objections would seem to be limited to the maps, which address lands above the high water mark which would not be part of the project at all. If this is not a mapping problem, we have some very major conflicts as was noted above as well as others in the draft Environmental Impact Statement and General Management Plan that I did not take the time in this letter to raise which need to be addressed and cleaned up.

I firmly believe it's the job of the lead agency under the NEPA process to address these issues now that they are raised. I would ask that the lead agency request the aid of the United States Congress for clarification or the necessary authority to enter into a joint agreement with all the jurisdictional parties to develop a joint planning agency or plan for the benefit of all of us. I think all of the agencies would like congress to address these issues. Who owns the land? Who has legal authority? What is the limit of each authority? Where does the authority of each act apply? I believe, and hope I have addressed enough for you to understand the conflicts I see within the plan and its appendixes. I know, jointly we could solve these issues if congress would permit it.

If you have any questions please call me at (509) 684-2401, Thank You


Loren D Wiltse
Stevens County, Planning Director

Cc: George Nethercutt

H Because the lands within the national recreation area are federally owned, decisions as to how the area will be managed rest with the federal land manager subject to applicable federal and state laws.

The state ceded concurrent jurisdiction to the federal government in March 1939 through an act passed by the state legislature for all of the lands purchased or condemned before that date for the construction of the Grand Coulee Dam and the Columbia Basin Irrigation Project (see appendix J of the draft plan).

The national recreation area is managed under concurrent jurisdiction, which involves many agencies in matters of mutual concern, particularly sanitation and law enforcement. The applicability of state and local laws to federal lands is determined on a case-by-case basis and depends on such factors as whether Congress has delegated authority to the states to enact state plans that are based on federal law, as is the case with the Clean Air and Clean Water Acts, or whether Congress has directed federal agencies to be consistent with state programs such as those developed under the federal Coastal Zone Management Act. As a matter of policy, the National Park Service complies with state and local laws as long as they are consistent with federal law.

I The National Park Service manages the federal lands within the national recreation area pursuant to applicable federal law and direction of the secretary of the interior.

Those issues where we believe that the authority for us to act does not exist have been identified. It is beyond the purview of this plan to recommend to the Congress that they take action to either clarify or modify the existing authorities. Such recommendations can only be made by the administration. However, the fact that the issue has been raised through the planning process could result in action being taken by the appropriate decision makers.

Comment Form

19 November 1998

COMMENTS ON LAKE ROOSEVELT DRAFT EIS

Submitted by Columbia River Fish Farms
 P. O. Box 1239
 Omak, WA 98841

A

While the Draft EIS adequately addresses most issues, its coverage of water quality and fisheries is totally inadequate, especially considering the fact that fisheries (and consequently water quality) are one of the major draws to Lake Roosevelt. The draft EIS even states that recreational fishing trips to Lake Roosevelt have been declining since 1993. If recreational fishing continues to decline will changes in the management of Lake Roosevelt be necessary?

Probably the most serious threat to water quality in Lake Roosevelt is the high level of dissolved gas during the spring and summer following winters with above average snow pack. High gas levels cause major fish mortality, effectively sterilizing all shallow waters of the lake. Dissolved gas levels were a primary reason for lowering the water level during 1996 and 1997. These low water levels are listed as cause for the decline in fishing effort, yet we find no mention of dissolved gas in the report.

B

Although high levels of dissolved gas occur during the runoff following large snow pack, the actual causes of high gas levels are man made and therefore can be solved by man. What part of this solution will the NPS play? Will alternative 1 allow the NPS to play an active role in the solution?

These questions need to be addressed if the draft EIS is to be considered complete.

COLUMBIA RIVER FISH FARMS

- A The management of the fishery on Lake Roosevelt is a very complex issue that goes far beyond the scope of this plan. Fisheries on the Columbia River System, of which Lake Roosevelt is a very small part, have national and international ramifications. Any final resolution of their management will require the participation of many federal, state, tribal, and foreign governmental entities. The scope of this plan addresses only the areas contained within the NRA boundary. Please see "Issues beyond the Scope of This Management Plan" on page 15 of the draft and the subsection on "Fishery Management" on page 18 of the draft for additional discussion.
- B The National Park Service is very interested in water quality issues. However, the resolution of questions of this type is beyond the scope of this plan. The resolution of this problem would involve processes similar to those needed to address fisheries concerns. Please see response to comment A above. Dissolved gases have long been identified as a problem on the Columbia River, and many other agencies are trying to develop solutions to this very vexing problem.

COMMENTS

RESPONSES

Comment Form

Grand Coulee Grange # 807
Grand Coulee, WA 99133

Lake Roosevelt was created for flood control, development of agricultural interests, and for hydro-electric power. It was not until after WW II did recreation become a use for Lake Roosevelt. The members of the Grand Coulee Grange want to see the agricultural interests along the shores continue to prosper. When the Columbia Basin Project was started the government made promises to the farmers that came to settle this area that they could make permanent settlements within the Columbia Basin. The government encouraged the establishing of the farms and ranches by providing water and allowing the use of the project lands for agricultural activities. The management plan states it does not have the authority to allow agricultural activities, yet the main reason The Columbia Basin Project was created was for agricultural production. The National Park Service must remember that Lake Roosevelt is part of the Columbia Basin Project.

A

As farmers and ranchers, our grange members feel the government has not honored its promises to the agricultural producers under the Reclamation Act and the Columbia Basin Project Act. The permanent settlement of farm families as stated in the Columbia Basin Project Act should be honored by all government agencies and farm families should not be forced out of business by the actions of NPS for recreation. If the government honors the treaties with the Native Americans then it should also honor the promises it made the American citizens that came west to settle the farms and ranches.

Farming and ranching is custom and cultural lifestyle of this area and should be preserved just as much as the Native American traditional custom and cultural lifestyle. Your management plan does not adequately address the custom and cultural traditions of the non Native American residents. We are the hard working TAX PAYING citizens which provide the funds for the NPS to manage the LRNRA and we feel our custom and cultural activities should be respected just as much as the Native American custom and cultural activities.

The members wish to be recorded as opposing the elimination of the agricultural activities within the Lake Roosevelt National Recreation Area.

Dick Douglas

Master of Grand Coulee Grange

GRAND COULEE GRANGE

A See summary comment A.

Lake Roosevelt Property Owner's Association

P.O. Box 459
Davenport, WA 99122

Vaughn
RECEIVED
JAN 5 1999
L.R.N.R.A. COMM. BOARD

January 5, 1999

Mr Vaughn Baker
Superintendent
Lake Roosevelt Nat'l Recreation Area
1008 Crest Dr
Coulee Dam, WA 99116

Dear Mr Baker,

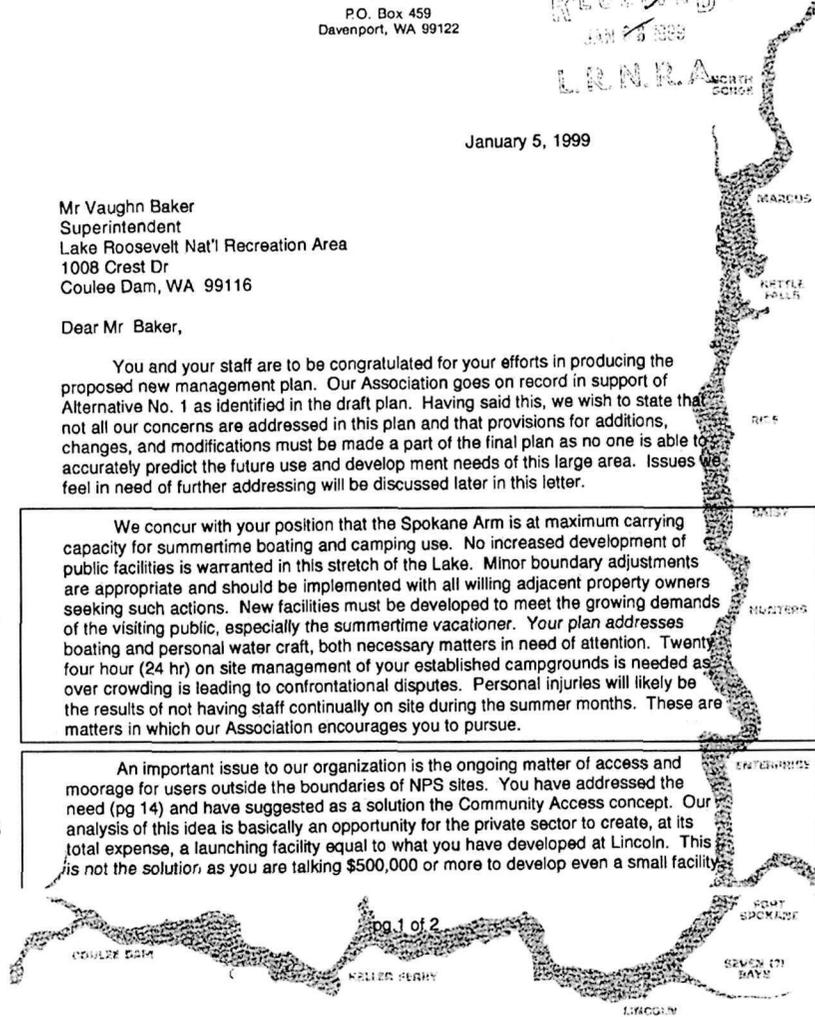
You and your staff are to be congratulated for your efforts in producing the proposed new management plan. Our Association goes on record in support of Alternative No. 1 as identified in the draft plan. Having said this, we wish to state that not all our concerns are addressed in this plan and that provisions for additions, changes, and modifications must be made a part of the final plan as no one is able to accurately predict the future use and development needs of this large area. Issues we feel in need of further addressing will be discussed later in this letter.

A

We concur with your position that the Spokane Arm is at maximum carrying capacity for summertime boating and camping use. No increased development of public facilities is warranted in this stretch of the Lake. Minor boundary adjustments are appropriate and should be implemented with all willing adjacent property owners seeking such actions. New facilities must be developed to meet the growing demands of the visiting public, especially the summertime vacationer. Your plan addresses boating and personal water craft, both necessary matters in need of attention. Twenty four hour (24 hr) on site management of your established campgrounds is needed as over crowding is leading to confrontational disputes. Personal injuries will likely be the results of not having staff continually on site during the summer months. These are matters in which our Association encourages you to pursue.

B

An important issue to our organization is the ongoing matter of access and moorage for users outside the boundaries of NPS sites. You have addressed the need (pg 14) and have suggested as a solution the Community Access concept. Our analysis of this idea is basically an opportunity for the private sector to create, at its total expense, a launching facility equal to what you have developed at Lincoln. This is not the solution as you are talking \$500,000 or more to develop even a small facility



LAKE ROSEVELT PROPERTY OWNER'S ASSOCIATION

- A Porcupine Bay, which is the major development entirely on the Spokane Arm, would be evaluated to determine if it can be redesigned or managed differently to make it operate more efficiently and to reduce environmental impacts. The capacity would not be increased. The proposal does provide provisions for new facilities, where needed and appropriate, elsewhere on the lake to accommodate additional visitors. The proposal also recognizes that additional staffing is needed to better manage existing and new facilities. However, staffing levels are subject to available funding.
- B Please see the first paragraph of community access on pages 28 and 29 of the draft plan. Four models for funding community access points are proposed: community funding, county funding, NPS funding, or a combination of the three. There are precedents for this at: Hanson Harbor which was funded by the National Park Service, at Lincoln Mill which was a joint project between the National Park Service and Lincoln County, and at Rantz Marine Park, which is entirely community funded. The scale of these developments could also vary a great deal which would impact the costs. The development at Lincoln Mill, which included a large paved parking lot, paved launch ramp, courtesy docks, and a restroom, cost less than \$500,000. The community's investment at Rantz Marine Park is significantly less than that.

COMMENTS

RESPONSES

Baker letter cont.

B

Secondly, the need for such facilities is on the Spokane Arm which by your own admission is already at capacity. Our concept of a Community Access is strictly shoreline based. In other words, agree to allowing moorage facilities and docks under some arrangement which could serve the boater in need of rescue or assistance due to injury, weather, or breakdown. In the absence of regular NPS boat patrolling, this community service can be most helpful. Your proposal looks good on paper and perhaps fulfills your obligation to satisfy a request of private property owners, but honestly falls very short of being a reasonable solution.

C

This brings us to another matter which needs further clarification: Special Use Permits. It appears to be a subjective interpretation on the part of the Park Service as to what users will benefit from the continuation of the Special Use Permit policy. Cabins at Sherman Creek and Rickey Point, certain campgrounds, and water withdrawal seem to be assured of continuation under the new plan, but docks, paths, and lawns do not enjoy the same consideration. By what authority does the Park Service have to selectively make this determination? We respectfully request a written reply to this question with reference to existing law.

D

The grazing matter is in our opinion unacceptable. The new plan indicates that grazing will be disallowed. Yet by the creation of Coulee Dam, one of the basic purposes was to support agriculture. This is specifically addressed on page 169 of the report. Yet, the Park Service has determined by policy to ignore this fact. The raising of cattle is an agricultural business. To deny the rancher access to the river for cattle watering creates a significant negative economic impact on them. This matter needs further attention and an acceptable solution.

E

Lastly, you have identified day-to-day operational issues on page 24 (law enforcement, debris removal, weed control, maintenance, safety and other management activities) and excepted them from the plan. These are very real problems which need to be addressed. We would be most interested in knowing when and how you intend to involve the Park Service in these important matters.

We ask that you give careful consideration to our suggestions and concerns. We are cognizant of the fact you will receive considerable input from individuals and groups who may disagree in part with our views. However, it is our contention that good management policy should be based upon the needs of the continual users of the area and not based upon the ideals of those who never come within 1,000 miles of the Lake, but endeavor to influence management policy based upon their philosophical feelings.

Sincerely,

Keith R. Green, President
Lake Roosevelt Property Owners Asso.

- C Although what is allowed as a special use permit and what is not allowed may appear to be subjective on the surface, it is not. The laws and regulations that govern this topic are complex and they have evolved over the period of time that the National Park Service has managed the national recreation area. This change, over time, adds to the confusion, because some of the uses mentioned were legitimate when first permitted, but subsequent legislation has disallowed them. Also, adding to the confusion, some uses that are allowed in some units of the park system are not allowed in others. Please refer to "Appendix G: Overview of NPS Authorities" in the draft plan for a more detailed discussion, or the 1990 *Special Use Permit Management Plan*, which references most of the applicable laws and regulations.
- D See summary comment A.
- E The purpose of a general management plan is to provide guidance and direction for the National Park Service decision makers. It is more of a policy document than a detailed implementation plan. The general management plan provides a general framework for making detailed decisions at a later date. This provides the flexibility that managers need to respond to changing conditions over the life of the plan while keeping their focus on the "big picture" issues identified. The specific issues identified will be addressed at the appropriate time by: detailed implementation plans, resource management plans, various operational plans, facility management plans, etc. The exact timing and the nature of the detailed plans will be a function of available funding, staffing, and management priorities, as well as direction from the general management plan.

National Parks
and Conservation Association

PACIFIC REGIONAL OFFICE

UBRIAN HUSE
Regional Director

30 January 1999

Vaughn Baker
Superintendent
Lake Roosevelt National Recreation Area
1008 Crest Drive
Coulee Dam, WA 99116-1259

RE: LAKE ROOSEVELT NATIONAL RECREATION AREA GENERAL MANAGEMENT
PLAN / ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Baker:

The National Parks and Conservation Association (NPCA) is pleased to respond with comments to the above referenced document. As you know, NPCA is the only private non-profit citizen organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System. We have nearly 400,000 members nationwide, including more than 70,000 in California.

Congratulations on completing the Draft General Management Plan (GMP) and Environmental Impact Statement (EIS) for the park. Given the complexities of joint management and administration for Lake Roosevelt, this task has been no small undertaking. We are especially pleased with the plan's attention to national park values and mandates. NPCA supports the proposed action as qualified by the following comments.

Carrying Capacity

NPCA is encouraged by the GMP's attention to carrying capacity. As visitation continues to grow, park managers are required to implement enforceable limits on the number of visitors, boats, and facilities within the park. The visitor management system must be based on this systematic analysis. We do not agree with the statement that sensitive resources in the park are "primarily cultural resources." Given the level of visitation, undisturbed coastline should also be considered sensitive. Undisturbed coastline will necessarily be impacted as the number of boats and visitors increase and must be afforded protection.

A



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BrianNPCA@aol.com • <http://www.npca.org>

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PRINTED ON RECYCLED PAPER

NATIONAL PARKS AND CONSERVATION ASSOCIATION

A There is little truly "undisturbed coastline" within the national recreation area, but there is a lot of undeveloped shoreline. Although it may have been modified extensively in the past by logging, grazing, or agriculture, today the undeveloped shoreline appears very natural and is one of the major factors that provide the natural character and beauty that many visitors seek. The preservation of this scenic resource is one of the primary purposes of the national recreation area. Please see page 11 of the draft plan. The scenery is a sensitive resource, and the text on page 26 of the draft plan has been revised to reflect that in the final plan. Under either alternative proposed, a high percentage of the shoreline would remain undeveloped to maintain the existing character as much as possible.

One thing to remember is that the National Park Service manages a relatively narrow band of land around the lake. Most of the viewshed is in either tribal or private ownership.

COMMENTS

RESPONSES

B

We are also concerned with the strategy of improving developments at Hunters, Keller Ferry, and Crescent Bay as a means to draw visitors away from more densely used areas. Without prior carrying capacity studies at these sites, the park could risk facing crowding problems around all developments as visitation increases. We are not suggesting that the improvements are not warranted, only that any improvements must be founded on appropriate carrying capacity and environmental analysis.

Finally, NPCA agrees with the GMP statement that any new development would not be considered before completing a carrying capacity analysis. However, the plan should articulate how the carrying capacity limits will be determined. The factors must include not only perceptions of crowding, but also indicators such as potential for visitor conflict, the costs involved with development, impacts to natural resources, and constraints on NPS administration.

Personal Water Craft

C

NPCA is gravely concerned over the park's lack of foresight in its management of personal water craft (PWCs). PWCs represent one of the greatest threats to public waterways, particularly those managed by the National Park Service. In addition to the obvious impacts of noise, visitor conflict, and safety, PWCs are massively destructive to the environment. Inefficient two stroke engines dump considerable amounts of hydrocarbons into the water and studies show that PWCs stress wildlife to a degree far beyond that of conventional boats. We appreciate that Lake Roosevelt is excluded from the federal rule prohibiting PWC use in national park units, but this does not limit the need to manage these thrill craft. This is one of the fastest growing forms of outdoor recreation. The GMP must include proactive management prescriptions which evaluate the current impacts from PWCs and implement appropriate restrictions to ameliorate these impacts and prevent those associated with increased use.

Crowded Facilities on the Spokane Arm

D

NPCA agrees that the Spokane Arm is close to reaching, if it has not already surpassed, its carrying capacity. We further support the GMP's intention to perform a carrying capacity analysis with respect to the design of visitor facilities in the Arm. However, this analysis must not be limited to an evaluation of whether the redesign could improve efficiency. Resource protection mandates require this analysis to also evaluate whether these facilities should be *reduced* in scale as a means to reduce crowding. In addition, steps should be taken to evaluate what impacts would be inherent to other sites on the lake as visitors, who are no longer able to access the Spokane Arm, seek out other access points.

Kettle Falls

E

NPCA cannot support the new facilities at Kettle Falls as conceived in the GMP. The proposal recommends a considerable level of development, yet provides little in the way of a justification for this action. As such, we are not convinced that the development is warranted, let alone appropriate, for the site. Moreover, the proposal does not adhere to NEPA guidelines which require a needs assessment, the inclusion of a full range of alternatives that meet those needs, and a complete environmental analysis of each alternative. Finally, as mentioned above, there is no carrying capacity analysis to support this development proposal. As written, the GMP can only

B We agree with this comment. Additional comprehensive studies, plans, and public review will be completed to evaluate potential impacts before any new improvements are implemented. Carrying capacity will be an integral component of this process. However, carrying capacity is a very subjective topic and is a function of both impacts on the environment and the perceived quality of visitors' experiences. Determination of carrying capacity would be based upon a detailed evaluation of site conditions, experience of NPS staff, and consultation with other managing partners and the public.

C The plan does recognize personal watercraft and the potential negative impact that they could have. Please see the section on boating on pages 14 and 15 of the draft plan. The proposal does seek to provide a broader range of boating experiences by the establishment of passive waters management areas to control the manner of operation and types of crafts. The proposal directs management to closely monitor all types of boating, including personal watercraft, and to develop new controls if warranted. Again, this is a very subjective issue. There was a lot of discussion, pro and con, on the topic. Another factor is the multijurisdiction of the reservoir surface. Both tribes would need to agree to any new controls to avoid creating an enforcement nightmare.

D Text on page 27 of the draft plan was revised in the final plan in alternative 1 to respond to this comment.

E Please see the section on Kettle Falls under "Issues and Concerns" on page 15 of the draft plan. Several valid reasons are given that justify this part of the proposal. There are significant problems with the operation of the Kettle Falls marina that need to be corrected to address safety, operational, and visitor use issues. This is a proposed expansion of an existing facility, not the construction of a new facility.

We agree with the need to perform additional detailed studies and analyses. The level of analysis done in this document was only that necessary to verify that the proposal was feasible at this location. A complete site-specific analysis would be done before any site work begins.

offer the improvement of Kettle Falls as a possible future action subject to complete analysis at a later date.

Community Access

The park has come a long way in developing the concept of community access points. The GMP proposes a creative means for providing additional access which has the potential to meet the needs of both developed communities and the general public. NPCA is concerned, however, that the discussion of community access has omitted three key points. First, in order to approve a community access facility, NPS must conduct a comprehensive carrying capacity analysis for the area served by the proposed access point. Only if projected use will not exceed the capacity limit could a community access point be approved. Second, any community access point must serve the community and the general public equally. That is, community access points should be limited to those facilities which allow for the launching and trailering of boats, courtesy docks, parking and necessary support facilities. Any provision for overnight moorage would establish a preferential use of public facilities. Finally, the establishment of a community access point must be compatible with the protection of park resources at and adjacent to the site.

F

We again thank you for this opportunity to comment on the Draft GMP/EIS for Lake Roosevelt National Recreation Area. Please keep us apprised of any and all developments related to this planning effort.

Sincerely,



F Carrying capacity would be evaluated as part of any community access proposal. The text on page 30 of the draft plan have been revised in the final plan.

Also, please see the first paragraph of community access on pages 28 and 29 of the draft. Four models for funding community access points are proposed: community funding, county funding, NPS funding, or a combination of the three. There are precedents for this at: Hanson Harbor which was funded by the National Park Service, at Lincoln Mill which was a joint project between the National Park Service and Lincoln County, and at Rantz Marine Park, which is entirely community funded. The scale of these developments could also vary a great deal which would impact the costs. The development at Lincoln Mill, which included a large paved parking lot, paved launch ramp, courtesy docks, and a restroom, cost less than \$500,000. The community's investment at Rantz Marine Park is significantly less than that.

Also see summary comments E and G.

COMMENTS

RESPONSES

12/20/98

Save Our Shoreline
 Jack Tenter President
 2225 Pine
 Davenport Wa. 99122

Lake Roosevelt GMP Planning Team
 Denver Service Center Culver DSC/RP
 12795 W. Alameda Park Way
 P.O. Box 25281
 Denver Colo. 80225/9901

RE: Comments on Lake Roosevelt Draft GMP

Dear Sirs:

We would like to present comments on the reason this new GMP was brought out and the way it was conceived, as well as the plan itself.

We feel that this entire project was brought on by a small minority group that has, through congressional work, presented themselves as "the local people of the area". This group which is called the Lake Roosevelt Property Owners Assoc. is made up of land developers and a few of the people owning property adjacent to the shoreline. It just happens, at least in Lincoln County, that the chief spokesmen for this minority group are the County Commissioners. One of which, Mr. Ted Hopkins, recently stood up in a public meeting and bragged that he had put the run on previous NPS Superintendent Gerald Tays, because he wouldn't work with him on softening the private use of the lake shoreline and undermining the 1990 Special use management Plan. They have worked diligently, using their political influence to bring the necessary pressure on the Park Dept. to revisit this plan.

Our Citizens group (S.O.S.) worked very hard with Mr. Gary Kluper then Superintendent of the N.P.S. in this region, through the exhaustive public meeting process, to formulate the 1990 Special use management plan. We attended all meetings and had a voice in building the draft of that plan. We wrote many letters to our legislators, many editorials in all of the local newspapers and invited all the local citizens to participate and become informed.

When we heard that the Property owners assoc. had managed to get that plan revisited we were very disappointed and immediately requested audience with Slade Gorton, George Nethercutt and Patty Murray. to present our side of the issue. Patty Murray received us, but Slade Gorton and George Nethercutt Refused.

When the Draft was put together, we the citizens, (the real local people) were not invited to participate. Superintendent Baker did meet with us and we were able to convey our thoughts to him. Including our desire to be included in the meetings to formulate any management plan changes, but he chose to ignore us.

He later told us that the citizens had had representation

SAVE OUR SHORLINE

A See summary comment B.

A

through our county commissioners who had been in attendance. Those same commissioners who are representing the private interest group (the Prop. Owners Assoc.) and had caused this whole debate. They were in fact our adversaries, paid lobbyists for the Prop. Owners Assoc. Their position would cause the withdrawal of public property from the public domain for the benefit of themselves and other adjacent prop. owners.

This left us in the awkward position of trying to defend our position after the fact. After we had won the debate in 1990 against the same people, on the same issue, we were not allowed to participate.

It should be apparent to any one using common sense that the "local people" should be all of us that live in the five counties bordering the lake. Including all of us who live on the lake. We and our families use the lake for all forms of recreation all year long. These public shorelines are important to us and we do not want to see control given to a private interest group. We want the adjacent property owners to keep all of their encroachments off. We feel that if we give them a foot hold such as community moorage facilities, it will encourage future privatization as the lake develops.

They went to Congress claiming the need for more local control. We the citizen feel just the opposite. We the citizens recognize the need of federal control to protect us from local influential political and private interest groups.

As we read the Draft GMP it first struck us that the new, Alternative # 1 was highly touted as a pro active plan while the old Alternative #2 plan was called reactive, and was held in less regard, when in fact the only significant difference between them are the concessions provided to private users and local developers.

We citizens agree in part with some of these concessions. We believe that additional public access points should be allowed at some of these developments in the form of public launch ramps with one service dock and adequate public parking. This additional access would be convenient also to adjacent areas of the counties and would help disperse the crowding now experienced in some areas. The idea that these communities should be allowed moorage facilities is wrong and nothing more than privatization and in direct conflict with concessionaire operated marinas. Seven Bays Marina moorage facilities have been undersubscribed for the past two years.

Many of our S.O.S. members live on the lake at Seven bays and Deer meadows, and we put our boats in and out of the lake every day, realizing that community moorage would be contrary to the public good. We would refer you to paragraph 1 page 4 and all of page 6 of the 1990 special Park Use Management plan. Please re-familiarize yourself with these articles and see if you don't agree that they would better serve the public interest in this matter in the future.

COMMENTS

RESPONSES

Page 3

B

We feel that the 1990 Special Use Management Plan is well defined well presented and very pro active. If properly enforced, it will protect these public lands from privatization.

C

You infer on pages 25-46 that Alternative # 2 would not be able to properly address the problems of the lake. For example on page 44 under community access you state that no new community based access points would be developed under Alternative # 2. That is totally false, we here on the lake have seen the ability of the N.P.S. to work with communities and counties in the recent past to install new launch ramps at both Lincoln and Hanson Harbor. Why would you put a false statement like that in this draft?

We feel that any and all the improvements suggested under Alternative # 1 would be just as likely to happen under Alternative # 2.

D

You state that the staff levels and the budget will be the same for both Alternatives and on paragraph 4 page 23 you state that new facilities would depend on availability of funds, so how is it more likely to have these improvements with #1 than #2 Alternative.

E

In describing the plan for a new Kettle Falls Marina you state that the project would be funded by the concessionaire. If so how is it that the N.P.S. could not proceed under Alternative # 2 ?

Those of us who have lived on the lake for years, have watched the N.P.S. do a fine job of meeting the challenges of the lake as they arose and unless the current superintendent is inadequate or merely put here to "find common ground" (quoting him) with the property owners assoc., we would not expect this to change.

F

On page 31, under minor boundary adjustments, we could foresee the possibility of boundary problems, but we feel any such transactions should have public review and public auction. Actually, we find this article highly suspect. Given the context of the rest of Alternative #1 we feel it would open the door for public land abuses.

After through study of this draft it seems to us that the only realistic difference between #1 and #2 Alternative are the concessions being made to the developers and other members of the Lake Roosevelt Property Assoc. through the articles-of community access page 28- 30 and Minor Boundary adjustments pages 31-32.

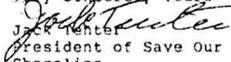
Since we do not feel that those articles are in the best interest of the public, we the citizens of the local Counties (the Real local people), would have to ask you to accept only

- B Congress provided specific direction in the form of Committee Report language with regard to revisiting the community dock issue and the consideration of other alternatives for providing greater public access to Lake Roosevelt in the development of the management plan. See also summary comment F.
- C You are correct that the National Park Service has been able to provide additional access at Hanson Harbor and Lincoln. In the case of Hanson Harbor, the National Park Service developed and maintains the facilities. At Lincoln, the facilities were developed in cooperation with Lincoln County. The National Park Service maintains the facilities. In neither case did the communities play a role in developing or maintaining the facilities. Under the community access points, it would be possible for communities to be partners in developing additional public access points.
- D In alternative 1, communities would be allowed to fund and construct new developments. This has not happened in the past.
- E You are correct that the National Park Service could have proceeded with the proposal for the Kettle Falls marina without updating the General Management Plan. However, it was determined that an environmental impact statement was needed on that proposal so it was decided to fold that in with a new general management plan.
- F As stated on page 32 of the draft plan, public review would be one of several requirements that would be involved before a minor boundary adjustment could be approved. The text in the final plan has been clarified as to circumstances under which these adjustments would be considered. Disposal or exchange of public lands would be done pursuant to applicable laws and regulations.

Page 4

Alternative # 2.

During the 1990 era the N.P.S. identified many different types of private encroachments on public land all up and down Lake Roosevelt and its tributaries. Many of those encroachments have not been removed as of this date. We feel that this has gone on for too long. Before N.P.S. spends additional funds on new projects, we would like to see this old slate cleaned up. This would certainly be within alternative #2. Why make a management plan if it is not going to be enforced.

Very Sincerely Yours

Jack Lehter
President of Save Our
Shoreline
2225 Pine ST.
Davenport, Wa. 99122

COMMENTS

RESPONSES

**VAAGEN BROS. LUMBER, INC.**

565 W. 5th Colville, WA 99114

January 20, 1999

Superintendent
 Lake Roosevelt National Recreation Area
 1008 Crest Drive
 Coulee Dam, WA 99116-1259

RECEIVED
 APR 11 1999
 LRNRA

Dear Superintendent:

We have completed our review of the Draft General Management Plan/Environmental Impact Statement for the Lake Roosevelt National Recreation Area.

We concur with the need to update the General Management Plan (GMP) for the National Recreation Area (NRA). We also concur with the purpose statements, significance statements, interpretive themes, and the identified desired futures. We agree that the range of alternatives is adequate and support the selection of the proposed action, Alternative 1.

However, we have the following concerns and recommendations for improvements:

A. The Plan Foundations (purpose, significance, interpretation, and desired futures) clearly recognize the importance of the role of the area's natural resources. This is demonstrated in the following statements:

"Natural, cultural, and scenic resources of the NRA are protected and preserved to ensure that the integrity of the environment is not compromised and the quality of the visitor experience is enhanced." (Resource Management, pg. 13)

"Gain an appreciation for the importance that the recreation area's natural and cultural resources have in their quality of life." (Desired Visitor Experience #1, pg. 13)

"Understand the reasons for protection and managing the recreation area's natural and cultural resources for future generations." (Desired Visitor Experience #3, pg. 13)

Although the importance of the natural resources was recognized, the need for and importance of natural resource management was not identified as an issue. This may be a result of past management activity or it may be a result of the public's lack of understanding of the current and future conditions which will require an aggressive, proactive management strategy to develop and maintain a healthy vegetative condition within the NRA.

VAAGEN BROS. LUMBER

COMMENTS

RESPONSES

The National Park Service (NPS) recognized the problem of vegetative health in the Affected Environment Section where it states:

"Forest insect and disease infestations are a continuing problem in the Ponderosa Pine forests of Lake Roosevelt." (pg. 83)

"The invasion of noxious vegetation continues to be a serious problem because control efforts have been limited....." (pg. 84)

"Control of pests and invasive nonnative plants would help maintain heterogeneous landscapes with diverse habitats.

Invasive nonnative plants are considered one of the most serious threats to biotic communities in the NRA. Nonnative plants have caused the loss of native vegetative cover and substantially reduced the amount of forage available to wildlife. Because elimination and control of problem plants would remain very difficult, and funding for control is often limited, they would continue to cause major long-term adverse impacts." (pg. 118)

Unfortunately, the NPS seems to downplay the significance of this problem (issue) and deals with it by making statements such as: "the NPS manages vegetation to control forest pests and noxious weeds, reduce safety hazards, and maintain historic landscapes", "NRA staff annually carry out measures to control forest pests", and "NRA staff also conduct noxious weed control activities". The only "planning" statements located were:

"NPS would also continue to manage vegetation to control forest pests and noxious weeds, reduce safety hazards, and maintain historic landscapes." (pg. 118)

"Management fires to reduce forest pests and fuel hazards and improve forest habitat conditions would cause moderate temporary decreases in air quality." (pg. 112)

"Existing vegetation management programs, such as those to improve forest health and to control noxious weed would continue." (pg. 30)

These statements would lead the reviewer to believe that "current" management is adequate. However, even though the current program(s) are not defined and therefore not understood, we do not believe that these actions are adequate to deal with the current nor the future natural resource problems, especially the vegetative health issues. Nor do we agree that noxious weed control, hazard tree removal, or actions necessary to obtain/maintain healthy forests are "day-to-day" operational issues and therefore do not need to be addressed in this plan.

The concept of the proposed action, Alternative 1, is "to manage the NRA for the same broad range of recreational opportunities that were provided in the past while maintaining the quality of the experience and protecting the character and resources of the area". (emphasis added) In our judgment, to meet his concept, the NPS needs to recognize the importance of the vegetative health issue and strengthen the discussion during the development of the final GMP/Environmental Impact Statement (EIS) for the Lake

A

A Please see " Purpose of Lake Roosevelt National Recreation Area" on page 11 of the draft management plan. The preservation, conservation, and protection of natural, cultural, and scenic resources is stated as one of the three primary purposes of the national recreation area. Please also see the "Resource Management" section of the preferred alternative on page 30 of the draft plan. That section explains the National Park Service's position on resource management at Lake Roosevelt National Recreation Area. To elaborate on this, the National Park Service generally does not manage resources for the production of commodities. Resource management is directed towards the specific purpose or purposes of the individual unit, which can vary widely from unit to unit across the national park system. The intensity of this management also varies and frequently is a function of funding and staffing levels, which often are beyond the control of local management. The National Park Service has been actively managing for forest health and control of invasive species within the national recreation area for several years.

Please see the "Introduction" section beginning on page 3 of the draft plan. A general management plan only sets a framework and provides direction for managers and decision makers. It does not provide a detailed operating plan. These types of plans, if needed, will be developed at a later time and will respond to the overall direction provided in the general management plan.

COMMENTS

RESPONSES

Roosevelt NRA. The final GMP/EIS should include aggressive, pro-active short range and long range strategies necessary to manage the terrestrial and aquatic noxious weed problems and to obtain/maintain healthy forests. Strategies should include projections of staffing and funding levels needed to accomplish the intent of the Plan Foundation Statements.

B

B. The identification of Management Areas (MA) in the proposed action is a major change. Although we concur with this change, we are concerned with some of the terminology used and possible future problems of interpretation during implementation. For example, NPS restrictions on hunting are currently related to their proximity to developed areas. Are these restrictions going to apply to the future Developed Recreation MA or only to the Concentrated Recreation MA? If the restrictions are interpretation to apply to the mapped Developed Recreation MA, it would constitute a major change from current management and we would strongly object!

C

In our opinion, the hunting and fishing discussion needs to be clarified for better public understanding. It would appear that Alternative 1 is only governed by State regulations whereas Alternative 2 is governed by State regulations plus NPS restrictions. In other areas of the document, Alternative 2 is shown to be the same as Alternative 1. We are unclear on what and where future restrictions will apply under the proposed action.

We recommend that the State regulations control and that the NPS restrictions be dropped or if they are necessary, that they only apply to the future Concentrated Recreation MA.

Thank you for the opportunity to comment. We will be looking forward to reviewing the final GMP.

Sincerely,
VAAGEN BROS. LUMBER, INC.



HUBERT B. SAGER
V. PRESIDENT, RESOURCES

- B No changes are anticipated in the way hunting is managed by the National Park Service within the NRA boundaries under either alternative. Restrictions will continue to be enforced based on proximity to actual developed areas, not on management area designations.
- C The national recreation area is managed under concurrent jurisdiction, which means that both federal and state laws apply. In the case of hunting and fishing regulations, state law generally applies.

Because the lands within the national recreation area are federally owned, decisions as to how the area will be managed rest with the federal land manager subject to applicable federal and state laws.

The state ceded concurrent jurisdiction to the federal government in March 1939 through an act passed by the state legislature for all of the lands purchased or condemned before that date for the construction of the Grand Coulee Dam and the Columbia Basin Irrigation Project (see appendix J of the draft plan).

The national recreation area is managed under concurrent jurisdiction, which involves many agencies in matters of mutual concern, particularly sanitation and law enforcement. The applicability of state and local laws to federal lands is determined on a case-by-case basis and depends on such factors as whether Congress has delegated authority to the states to enact state plans that are based on federal law, as is the case with the Clean Air and Clean Water Acts, or whether Congress has directed federal agencies to be consistent with state programs such as those developed under the federal Coastal Zone Management Act. As a matter of policy, the National Park Service complies with state and local laws as long as they are consistent with federal law.

Tribal laws and regulations apply to the portions of Lake Roosevelt that fall within the boundaries of the Colville and Spokane Reservations.

Comment Form

1. No new M.P.S. facilities on Sparkane Arm - good thought
2. The enclosed shore land camping (dog? oversight) is creating waste disposal concerns. The pump out of sewage from large boats is also a concern. Sealed tank requirements would help.

A

3. Community access factors appear to be so restrictive that any development is unlikely. Of particular concern will be road upgrades, toilet facilities, maintenance costs and liability concerns. If these don't stop the development, surely the Rd Dept. of proposed regulations plus deaerated entralto... will.

INDIVIDUALS

- A Please see the first paragraph of community access on pages 28 and 29 of the draft. Four models for funding community access points are proposed: community funding, county funding, NPS funding, or a combination of the three. There are precedents for this: Hanson Harbor was funded by the National Park Service; Lincoln Mill was a joint project between the National Park Service and Lincoln County; and at Rantz Marine Park, was entirely community funded. The scale of these developments could also vary a great deal, which would impact the costs. The development at Lincoln Mill, which included a large paved parking lot, paved launch ramp, courtesy docks, and a restroom, cost less than \$500,000. The community's investment at Rantz Marine Park is significantly less than that.

COMMENTS

RESPONSES

CHARLES BOOTH

RECEIVED
 JAN 24 1989
 L.P.N.R.A.

Mr. Vaughn Baker, Superintendent
 National Park Service
 Lake Roosevelt National Recreation Area
 1008 Crest Drive
 Coulee Dam, WA 99116-1259

Dear Superintendent Baker:

Thank you for your letter of December 18th, explaining the draft of the N.R.A. Management Plan.

There are a number of items related to my request for an easement that are not addressed in this new proposal. I would, therefore, appreciate having you examine these with the hope of either including some of this information as criteria in your minor boundary adjustment section of the draft or perhaps offer me some other reasonable suggestions which would enable me to clear what is presently a clouded title to my property.

This cabin was built in 1965 at its present location. I have been told N.P.S. rangers visited this site before, during and following its construction. I purchased this property in 1981. Sometime later, a B.O.R. survey crew came into Sunset Point, resurveyed the boundary crossing the front of the six existing cabins, and I learned at that time the northwest corner of our cabin and deck extended approximately 14 feet beyond the B.O.R. boundary. Each succeeding ranger that visited the area after that time appeared to be aware of this problem, but did not seem particularly concerned nor did they ever suggest to me that a permit was required or could be applied for. When questioned about the boundary, I always pointed out the metal stake marker on the west side of the cabin.

After the flood in March of 1989, which destroyed the access road we had used for several years, and the rebuilding of the new access, we began to increasingly notice more rangers in our area. This continued over the next couple of years during which time we would see Ranger Tom Teaford by himself, but usually with one or two and occasionally as many as three others either accompanying or meeting him. We observed them measuring, marking, mapping and photographing. This continued intermittently for several months, and Ranger Teaford eventually informed us the Park Service had been compiling a portfolio of encroachments that existed at Sunset Point.

COMMENTS

RESPONSES

During this period of time, an annual check was sent to renew our dock permit. The original dock permit had been consolidated with a water pump permit which was canceled in 1976, following the drilling of a new well on what was, at that time, the Hood property and the installation of a new water system. This check was returned to us uncashed, along with a letter from Superintendent Gary Kuiper, informing us there was no permit for this dock. We were later informed by Ranger Gil Goodrich there was no record of a dock permit ever being issued to Sunset Point.

I had obtained a permit in 1981 to add two slips to the existing Sunset Point dock with the understanding my permit would become part of the Sunset Point dock permit the following year. We had several meetings and conversations with Ranger Goodrich and provided him documentation of this. We also informed him the water pump permit was to have been canceled, and we had mistakenly continued paying for the water pump due to an error in the permit numbers. We were finally forced to employ an attorney to represent us, and this error was subsequently corrected.

Following more meetings with Rangers Gil Goodrich and Darrel Cook, it was agreed the dock permit would be reissued, if we agreed to rectify the items of encroachment listed in acting Superintendent Darrel Cook's letter of December 16th, 1992. Both parties carried out the terms of this agreement.

Item 18 of the above mentioned letter states, "The National Park Service recognizes that a corner of the Booth cabin and patio is located on public land without authorization. Given the permanency of this structure and the hardship that would be placed upon Mr. Booth to remove this property from public land, no action will be required on this item at this time. Should the cabin undergo future rehabilitation or construction, it would be in the best interest of the cabin owner to modify (remove) the subject corner." Once again, I interpreted this decision to be of limited concern to the Park Service and was appreciative of Mr. Cook's determination.

I believe I fully meet the qualifications as listed in the minor boundary adjustments section of the draft plan. This easement, if granted, would require no expense for fencing nor enforcement. There is little, if any, practical recreational potential. No practical alternative exists. The quantity of land is very small. I think you will agree there is no need for reclamation nor recreation purposes, and there are no sensitive resources.

I don't believe I am responsible for any trespass, because the cabin occupied this site for 16 years prior to our purchasing it. Had it been in trespass, the Park Service had ample opportunity to make this charge against an owner some 33 years earlier. This property is located well above the 1,310 foot contour interval -- I would estimate a minimum of 50 feet. I believe this land contains no sensitive cultural nor natural resources, public notification nor tribal consultation.

COMMENTS

RESPONSES

Since the only requirement I have failed to fulfill is the application for a permit at an earlier date, I don't believe I am guilty of your charge of trespass, and further feel this accusation is unfounded and discriminatory. I have heard rumors of instances of a very similar nature being satisfactorily resolved in the past and am aware of others that exist at the present time.

Coupled with the points of consideration I have listed, I would like to remind you of the last public scoping meeting held at Porcupine Bay, where you addressed this specific issue and inferred the Park Service had, and would use, the flexibility of finding a mutually agreeable method of resolving these boundary issues. You used the property you and Howard Beloved had earlier discussed that laid in his area as an example. You repeated this address at a later meeting at Deer Meadows with various County Commissioners present, and once again referred to the property located in Howard Beloved's area which is Sunset Point. This property is mine.

A

I ask you to please reconsider the determination made in your letter and find that the minor boundary adjustments section of the proposed Management Plan does, or indeed should, contain provisions for resolving problems such as this.

Your prompt attention and reply to this request will be deeply appreciated.

Respectfully,

Charles (Chuck) W. Booth

c:Ranger Marty Huseman
N.P.S. South District Office
Mr. Ted Hopkins, Chairman
Lincoln County Commissioners

A The text on pages 31-32 in the draft plan has been revised in the final plan to address situations such as that cited in your letter.

COMMENTS

RESPONSES

January 1999

Superintendent, Lake Roosevelt N.R.A
1008 Crest Drive
Coulee Dam, Wa 99116-1259

JAN 29 1999

Dear Superintendent Baker,

L.R.M.K.A.

I have been to a number of meetings on your proposed management plan and read the book. Alternative # 1 maybe an improvement for the general public and tribes, however there are several things I don,t understand for the non-tribal landowner;s.

As to boat ramps for the home developed areas with landowners living there, I feel dock's should stay and when permits were issued I understood the public could use them and this greatly eased traffic at your developed campgrounds and gave landowners access to the lake. It should be that way now!

A

I own land south of the rivepon the Spokane arm across from the Spokane Reservation (Sec.13,14,22,23,24,& 27,T.27,R:38)with only the river and your narrow strip between the Spokane Tribe and me.This has about 1300 acres, of which only 154 is farm ground under irrigation, therest is minimal crossed fenced pasture. 550acres of that on west side of fence has no water except for the river. I am very sorry you did not resolve the grazing issue! We are talking about 4 miles of water front.

I don't care for the map of that area & dispersed recreation coloring, you are well into private property & the irrigated field & pasture. I Understand why the passive waters because of the narrow, swift area & your comment to me to make it a canoe area. Now just where are you launching & landing these canoes? I am glad,read the Tribe has indicated it does not have an interest in develouping the proposed concession on the map opposite pg.172. What a road to get there. A concession at the proposed point would really give me problems as you say Hunting and camping are permitted. There are several placeson my side of the river that could cause problems from fire and trash if used.

I like the quietness down thereand also like to know who is hunting on my property. Nature,s critters need a place too. Cattle and critters do work together as we have had both for years. People cause problems in the mix.

B

Does no new developement mean I can;t add a home to a lot we saved back when plating a site on the river in the Sixties?

A Property owner&Taxpayer,

Doris Dietrich

DORIS DIETRICH

A See summary comment A.

B The general management plan applies only to public lands managed by the National Park Service and not to private lands. The proposal for no new development on the Spokane Arm refers to facilities that the National Park Service would construct on public lands.

COMMENTS

January 29, 1999

Vaughn Baker, Superintendent
Lake Roosevelt National Recreation Area
1008 Crest Drive
Coulee Dam, Washington 99116-1259

RECEIVED
FEB 08 1999
LRNRA

Re: General Management Plan EIS

Dear Mr. Baker:

Please accept my comment on the EIS and Plan which will guide operations for the next 10 to 20 years. Generally, I support Alternative 1 - The Proposed ACTION. I would add the following comment on this alternative:

A I believe the NPS needs to develop a flexible fund to support ramp extension work. As you know these draw downs are unpredictable and depend heavily on winter precipitation patterns that it is not possible for the NPS to budget for a particular year. For example, I just heard a day or two ago that the draw down may be as much as 70 feet this spring. I would guess if I asked you if the NPS is ready to extend ramps this spring to take advantage of this draw down you would say that it is not in your budget. This will continue to be a problem unless a change is made.

I believe tree thinning within those forested areas below the "1310" line is a serious need. I have property that abuts the line and I am concerned about fire. There is a lot clean up and thinning needed for safety and forest health reasons. If a forester could be available to "1310" adjacent property owners for consultation these owners could maintain those areas of concern.

I believe the proposed location for the deep water marina just north of the current Kettle Falls marina is a good compromise even though it is not well protected from winds.

I applaud the decision to allow continued irrigation practices on LRNRA although cattle grazing permits still need to follow recommended practices to protect water quality.

Finally, I understand the decision to continue to allow personal water craft on Lake Roosevelt although I am concerned that, in time, the noise pollution issue will increase and become a negative in the attempt to maintain a natural character to LRNRA.

Thank you for this opportunity to respond.

Sincerely,


David W King

RESPONSES

DAVID KING

- A The availability of funds to take advantage of lower drawdowns has been, as you suggest, a problem in the past. The funding was not always available when we had the opportunity to extend the launch ramps. The fee demonstration program that has been authorized through 2001 gives us the flexibility you refer to by allowing the collecting park to retain 80% of the fees collected at the park for projects such as extending launch ramps. Hopefully, this program or something similar will be authorized beyond 2001.

We will continue to evaluate access points for the potential to extend launch ramps to lower elevations. However, opportunities for extending launch ramps are limited by physical as well as fiscal constraints. Several of our ramps either end in abrupt drop-offs or level off into extended flat areas -- neither situation is suitable for extending ramps.

RECEIVED
JAN 22 1999
L.L.N.R.A.

January 21, 1999

Lake Roosevelt GMP Planning Team
Denver Service Center - Culver DSC/RP
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-9901

First of all, we would like to thank Superintendent Vaughn Baker for the time and effort that has been put into the proposed Lake Roosevelt General Management Plan. It is definitely an improvement to be able to discuss our issues as property owners along the lake with the Park Service.

After reviewing the proposed plan, we prefer the Alternative No. 1. We are especially interested in the boundary adjustments, and would like to see this resolved in writing legally, with the exchange or purchase of these areas where special use permits were issued over the past several years. We realize, however, that this should be above the 1310 mark, and where appropriate, giving the land owner the opportunity to either purchase or exchange to that line. This will take the burden away from the Park Service to maintain weed control, litter and waste. It is essential to the property owner that he have this issue resolved, to keep it from coming up time and time again, that adds cost to the government and to the property owner. We agree that this should only apply to those that have had the special use permits and not be extended to other government lands along the Lake. Let's put this issue to bed.

With the increase use of the Lake, it is evident that more Rangers are necessary to patrol the lake shores in order to keep control of fires, refuse, human waste and safe use of watercrafts. In order to enforce the plan, perhaps an increase in fines is necessary to get the attention of those or violate the laws. We would also like to see more waste dumps on the lake to keep boats from dumping in the lake (as they do).

A

The community and personal docks have been a heated issue. Would it not be appropriate to permit the existing docks to remain, but not issue any further permits unless approved on an individual basis by the Park Service, the County Commissioners and the adjacent property owners. Of course, the private docks would need to comply to public use. We agree that more access points need to be established (such as Crescent Bay area) and the extension of ramps so that they can be used in the winter when the drawdown occurs.

ALAN AND MONICA KRAUSE

A All of the existing docks would need to be evaluated according to the criteria proposed in the community access points section on pages 28-30 of the draft plan before they could be permitted.

See also summary comment E.

COMMENTS

RESPONSES

Page 2

In regards to the grazing issue. It appears to us that it is only fair that grazing be allowed to continue. This is a hardship for the cattlemen.

Again we would like to thank you for the opportunity to voice our concerns and hope that some of these issues that are taking up valuable time and money will be resolved effectively and permanently. The overall plan is definitely an improvement.

Sincerely,

Alan Krause
Monica Krause
Alan and Monica Krause

- CC: Superintendent Vaughn Baker ✓
- CC: Congressman George Nethercutt
- CC: Slade Gordan
- CC: Lincoln County Commissioners

COMMENTS

RESPONSES

RECEIVED

JAN 27 1999

L. K. M. R. A.

CARL J MATTSON

JAN 26, 1999

NATIONAL PARK SERVICE
COULEE DAM NATIONAL RECREATION AREA
1008 CREST DRIVE
COULEE DAM, WA 99116-1259

THIS LETTER IS IN REPLY TO THE DRAFT GENERAL MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT, FOR LAKE ROOSEVELT. I BELIEVE THIS DOCUMENT MAYBE DATED SEPTEMBER 19987

ONE UP FRONT COMMENT IS THE DOCUMENT DATE. IN REVIEWING THE DOCUMENT I AM NOT SURE OF THE DATE, I KNOW THIS IS NIT-PICKING, BUT SHOULD NOT THE DOCUMENT DATE BE EASY TO FINE.

MY MAIN CONCERN WITH THE DOCUMENT IS THE ISSUE OF BOATING FACILITIES INCLUDING LOCATIONS, TYPE AND WHO RUNS THEM.

FACILITY LOCATION

A

AS I HAVE STATED IN MANY EARLIER LETTERS ADDRESSING OTHER SUBJECTS, MORE BOAT MOORAGE FACILITIES ARE NEEDED ON ROOSEVELT LAKE. THE DISTANCE FOR EXAMPLE BETWEEN FORT SPOKANE AND KETTLE FALLS IS TO GREAT. ADDITIONAL MOORAGE FACILITIES WOULD BE JUSTIFIED BOTH TO REDUCE DRIVING TIME AND TO HELP BETTER DISTRIBUTE USE.

B

ADDITIONAL BOAT RAMPS APPEAR TO BE THE BEST METHOD TO HELP DISPERSE USE. MOST OF THE BOAT USE APPEARS TO BE DAILY IN NATURE AND ADDITIONAL RAMPS MAY HELP TO DISPERSE USE. ALSO THESE RAMPS WOULD ONLY HAVE TO BE USABLE WHEN THE LAKE IS WITHIN ABOUT 20 FEET OF FULL POOL. LAKE USE DISPERSION AND CROWDING AT BOAT RAMPS IS ONLY A PROBLEM AT THE NORTH END OF THE LAKE IN THE SUMMER. ALSO CUTS DOWN ON LAUNCH RAMP CONSTRUCTION.

FACILITY TYPE

C

AS FAR AS BOAT MOORAGE IS CONCERNED A COMPLETE RANGE OF FACILITIES SHOULD BE CONSIDERED. THE NEW MARINAS PROPOSED FOR KETTLE FALLS, FOR EXAMPLE, ONLY PROPOSES EXTREMELY EXPENSIVE DOCKS.

FOR EXAMPLE MOORING BUOYS SHOULD BE CONSIDERED AS WELL AS THE MORE EXPENSIVE DOCK PROPOSALS. MOORING BUOYS CAN BETTER RIDE OUT A WIND STORM THAN DOCKS AND SHOULD HAVE LESS ENVIRONMENTAL IMPACTS.

WITH THE SHORT BOATING SEASON ON LAKE ROOSEVELT COSTS SHOULD BE A MAJOR CONSIDERATION OF ANY PROPOSAL.

I WOULD LIKE A FULL ECONOMIC ANALYSIS OF COSTS AND RETURNS OF ANY DEVELOPMENT.

CARL MATTSON

- A Additional moorage would be allowed under alternative 1 via the construction of new marinas, such as the ones proposed at Kettle Falls and Crescent Bay as well as the expansion of existing marina operations. Community access points could also provide additional moorage. The text on pages 28-30 of the draft plan has been revised in the final plan. Also, additional moorage could be one of the new services provided by the expanded facilities proposed for Hunters in alternative 1.
- B Additional boat ramps would be allowed under the provisions for community access points as described in alternative 1. These new ramps would be in underserved areas, and most would be accessible only during periods when the lake is between elevations 1,270 to 1,290.
- C Alternative 1 would allow for a complete range of mooring options. A higher level of service would be provided at the commercial marinas, while less expensive moorage could be provided at the community access points. The actual form of the moorage would vary to suit the location and the level of service desired. Mooring buoys could be allowed in any of the areas if they were deemed the appropriate solution for that location.

COMMENTS

RESPONSES

WHO RUNS THE FACILITIES

I REALLY DO NOT CARE WHO RUNS THE FACILITIES AS LONG AS NEEDS ARE MET AT A FAIR PRICE

OFFER A RANGE OF FACILITIES. FOR EXAMPLE THE CONCESSIONAIRE AT KETTLE FALLS APPEARS JUST TO WANT TO PROVIDE EXPENSIVE DOCKS, SOME COVERED AND WITH ELECTRICAL AND ETC. WHICH I DO NOT WANT OR NEED. I'M SURE THIS INCREASES HIS GROSS TAKE AND PROFIT MARGIN INCREASES.

I NOTED SOME PUBLIC COMMENT ABOUT PRIVATE FACILITIES ARE NOT APPROPRIATE FOR THE LAKE. TO ME COMMUNITY FACILITIES AND CONCESSIONS ARE ONE IN THE SAME. BOTH OF THESE METHODS WOULD BE ACCEPTABLE IF THEY ARE REGULATED

I DO NOT APPROVE OF PRIVATE INDIVIDUAL FACILITIES LIKE DOCKS AND ETC. HOWEVER, PROVISIONS SHOULD BE MADE FOR THESE INDIVIDUALS UNTIL REASONABLE REPLACEMENTS, BOTH IN COST AND DISTANCES, ARE PROVIDED.

FEES FROM COMMUNITY TYPE FACILITIES PROBABLY GET A BETTER RETURN THAN FROM CONCESSION FEES. BASE ON DATA I SAW SEVERAL YEARS AGO THE NATIONAL PARK SERVICE GET ABOUT 3 CENTS OF EVERY DOLLAR OF THE CONCESSION FEE.

IN THESE DAYS OF REINVENTING GOVERNMENT THE NATIONAL PARK SERVICE SHOULD ADDRESS SOME OF THERE POLICIES AND PROCEDURES ESPECIALLY IF THEY CAN GET MORE REVENUE WITH SIMILAR IMPACTS.

BASED ON MY PAST EXPERIENCE WITH CONTRACTORS AND GOVERNMENT CONTRACTS, I WOULD BET THAT CONTRACT ADMINISTRATION OF CONCESSIONAIRES ARE QUITE COSTLY TO THE GOVERNMENT. CONTRACTORS HAVE ALL KINDS OF WAYS TO REDUCE THERE COSTS TO INCREASE PROFITS DRIVING CONTRACT ADMINISTRATORS UP THE WALL. I DO NOT BELIEVE YOU WOULD HAVE THE SAME TYPE OF PROBLEM WITH NON PROFIT COMMUNITY TYPE GROUPS. IN MOST CASES, THEY WOULD BE USER TO DEAL WITH.

THE COMMUNITY TYPE OPERATION IS A MUCH BETTER ALTERNATIVE THAN INDIVIDUAL FACILITIES OR CONCESSIONS FOR THE SMALLER TYPE OF FACILITY. ALSO A CONCESSIONAIRE WOULD PROBABLY BE UNABLE TO MAKE A PROFIT ON DISPERSED SMALL FACILITIES.

KETTLE FALLS MARINA EXPANSION

THIS PROPOSAL WILL ADDRESS THIS PROPOSAL SEPARATELY FROM THE ABOVE. I PERSONALLY HAVE PROBLEMS WITH EXPANSION OF THE KETTLE FALLS MARINA FOR THE FOLLOWING REASONS:

- 1) FIRST AND FOREMOST FROM THE MAP PROVIDED THE COST APPEARS TO BE ASTRONOMICAL FOR THE SEASON OF USE. FEES TO THE PUBLIC WILL BE HIGH
- 2) PLANS KEEP INSISTING DOCKS SOME COVERED ALL WHICH ARE VERY EXPENSIVE TO CONSTRUCTION AND MAINTAIN.
- 3) WHAT ABOUT MOORING BUOYS WHICH ARE MUCH CHEAPER?

FOR EXAMPLE THE RICKEY POINT SAILING CLUB BUOY FIELD WHICH I AM VERY FAMILIAR WITH, HAVING DONE THE ORIGINAL DESIGN, IS A LOW COST OPERATION. THE

D

E

- D Under either alternative, facilities within Lake Roosevelt National Recreation Area would continue to be managed either directly by the National Park Service or under concessioner contracts administered by the National Park Service. The final mixture will be determined by which entity is able to offer the best level of service to the public. In the past, the National Park Service has managed the less developed facilities such as campgrounds, swim beaches, and boat launch ramps. Concessioners have operated the more developed facilities such as the marinas where a higher level of service is provided. This general pattern would continue under either alternative; however, in the provisions for community access points in alternative 1, some additional uses of the concession authority could be added.
- E The exact nature of the proposed new marina at Kettle Falls would not be determined until more detailed planning and design work was completed. The work done in this document was preliminary. Only enough detail was analyzed to determine if the proposed site was a feasible location. If the proposed alternative is selected and approved, additional design work and NEPA documentation would be completed before any construction began. As part of the NEPA process, the public would have an opportunity to review and comment on the final proposal.

COMMENTS

RESPONSES

COST TO INSTALL THE 17 BUOY FIELD WAS ABOUT \$300 PER BUOY. WITH DEVELOPMENT COSTS AT THIS LEVEL THE MOORING FEES COULD BE QUITE REASONABLE NO MATTER WHO THE DEVELOPER MAY BE

4) THE PROPOSED LOCATION HAS LITTLE PROTECTION FROM THE WIND. YOU HAVE TO USE A LOT OF IMAGINATION TO SAY ITS BEHIND A POINT. FROM MY SAILING EXPERIENCE NEAR THIS LOCATION THE ONLY REAL SHELTER IS THE SMALL COVE ACROSS THE LAKE.

5) THE WATER DEPTH IN THIS AREA APPEARS TO DEEP. A MOORING BUOY IN ABOUT 60 FEET OF WATER IT WOULD TAKE ABOUT 180 OF HEAVY LINE AND OR CHAIN WITH AT LEAST A 200 LB STEEL ANCHOR TO HOLD A SMALL SAIL BOAT. TO SAFELY HOLD A DOCK COMPLEX WOULD BE A MAJOR ENGINEERING PROJECT, WITH CORRESPONDING COSTS.

6) I WOULD EXPECT WAVE ACTION GREATER THAN IN YOUR REPORT. BASED ON WHAT I SAW DURING THE SO CALLED FIRE STORM A FEW YEARS AGO.

7) IS THERE A NEED FOR YEAR AROUND FACILITIES. THE BOATING SEASON AT BEST IS SHORT WITH THE HEAVIEST USE FROM ABOUT MEMORIAL DAY. IF THE LAKE LEVEL IS UP, TO LABOR DAY. AFTER LABOR DAY USE IS NIL. THIS I BASE ON MY LATE SEASON SAILING AND LIVING WITHIN VIEW OF THE LAKE FOR THE PAST 30 YEARS. THIS IS NOT A SCIENTIFIC SURVEY JUST AN OBSERVATION.

THEREFORE, I WOULD GUESS THE MARINA WOULD BE MOSTLY USE FOR WATER STORAGE OF BOATS FOR ABOUT 8 MONTHS EACH YEAR. WOULD NOT IT BE BEST TO ENCOURAGE OFF LAKE STORAGE FOR MOST OF THE YEAR.

8) I SEE NO BOAT LAUNCH AT THIS MARINA SO WHY A PARKING LOT WHICH REFERENCES CAR AND TRAILERS?

9) MOVE THE HOUSE BOATS FROM THE MARINA TO PROVIDE ADDITIONAL SPACE. I POINTED THIS OUT YEARS AGO THAT THEY TAKE UP TO MUCH SPACE AND INTERFERE WITH ACCESS TO THE STORE AND FUEL.

11) IS A STORE AND ETC. REALLY NEEDED, WHEN ANOTHER IS WITHIN ABOUT 1/4 MILES

12) WHY NOT TRY A TEMPORARY HOUSEBOAT ONLY FACILITY NEAR THE BOISE CASCADE PLANT TO SEE IF IT COULD WORK. THIS WOULD NOT HAVE THE COLOSSAL COSTS OF THIS MARINA PROPOSAL.

AS I SEE THIS PROPOSAL THE ECONOMIC FEASIBILITY COULD BE DETERMINED IN THE MATTER OF MINUTES. THE CAPITAL INVESTMENT WOULD BE PROHIBITIVE. DOES THE CONCESSIONAIRE PAY FOR ALL THE NECESSARY CONSTRUCTION?

WITH THIS PROPOSAL I AM AFRAID WE WOULD WIND UP WITH A VERY EXPENSIVE MARINA, AND ABSURD MOORING FEES.

A SMALLER AND MORE DISPERSED MARINAS MAYBE A BETTER ALTERNATIVE. SMALLER MARINAS MAY FIT THE LAKE BETTER THAN HAVE THE LAKE FIT THIS PROPOSAL

I WOULD LOOK FOR A BETTER SITE. ADAPT THE FACILITIES TO THE AVAILABLE SITES, INSTEAD OF THIS ALL OR NOTHING PROPOSAL. THIS PROPOSAL REQUIRES A VERY NARROW CRITERIA OF CONDITIONS WHICH MAY NOT BE AVAILABLE IN THE KETTLE FALLS AREA.

COMMENTS

RESPONSES

OTHER

THIS IS PROBABLY BEYOND THE SCOPE OF THIS DOCUMENT, BUT I WOULD LIKE TO ADDRESS IT. THE LAKE LEVELS ARE A CONTINUING PROBLEM AND WILL PROBABLY CONTINUE ON INTO THE FUTURE. THIS PROBLEM SHORTEN THE SEASON AS WELL AS INCREASES THE COST OF CONSTRUCTION OF FACILITIES AS WELL AS MAKING IT NECESSARY TO REPLACE SOME FACILITIES. SHOULD NOT SOME OF THE FUNDS CREATED BY SAY THE GENERATION OF POWER BE USED TO OFF SET SOME OF THE CONSTRUCTION COSTS OF FACILITIES LIKE A POSSIBLE NEW MARINA AT KETTLE FALLS.

A GOOD EXAMPLE OF A FACILITY WHICH SHOULD BE REPLACED IS THE SWM AREA ABOUT ONE MILE SOUTH OF THE MARINA AT KETTLE FALLS. IT IS A CRYING SHAME THIS BEAUTIFUL SWIM AREA IS ALMOST ALWAYS USELESS FOR SWIMMING. I ASSUME WHEN IT WAS CONSTRUCTED LAKE LEVELS WERE NOT A PROBLEM.

HOUSEBOATS SEEM TO HAVE A DISPROPORTIONAL IMPACT ON THE LAKE IN RELATION TO THE AMOUNT OF USE. THESE 39,000 USER DAYS SEEM TO STEP ON THE TOES OF OTHER USERS.

JET SKI THIS TYPE BOAT SHOULD BE MADE QUIETER IN RELATION TO THERE SIZE. YOU DO NOT HAVE TO BE A PROPHET TO PREDICT JET SKIS WILL CONTINUE TO BE A PROBLEM, WITH I BELIEVE, IS A LARGE SEGMENT OF THE POPULATION.

UNDER THE EXISTING ALTERNATE THE DELETION OF SPECIAL USES IS NOT A VERY PROGRESSIVE ACTION. IN THAT CASE WE WOULD HAVE ONLY THE CONCESSIONS FOR MOORAGE AT VAST DISTANCES APART.

THE PARKING LOT CROWDING PROBLEM AT KETTLE FALLS CAN ONLY BE RESOLVED BY CONSTRUCTION OF ADDITION LAUNCH RAMPS AT OTHER LOCATIONS. A NEW MARINA AT KETTLE FALLS WOULD NOT BE AN ANSWER TO THIS CROWDING. I DO NOT THINK THAT ADDITIONAL LAUNCH RAMPS ALONG THE LAKE WILL HELP THE KETTLE FALLS PROBLEM UNLESS THE ADDITIONAL RAMP WITH PARKING IS BUILT NEAR THE EXISTING MARINA. HAS THE AREA ABOUT A QUARTER OF A MILE SOUTH OF THE MARINA EVER BEEN LOOKED AT? THIS AREA IS A LARGE FLAT WHICH WOULD PROVIDE PARKING FOR A LARGE NUMBER OF CARS AND ETC.

BY THE WAY, I THINK YOUR AGENCY DID A GREAT JOB ON THE LAUNCH RAMP AT THE FRENCH ROCK ISLANDS SOUTH OF KETTLE FALLS. IT FITS THE LANDSCAPE WELL WITH THE PARKING OUT OF SIGHT OF THE LAKE.

IN SUMMARY I BELIEVE ADDITIONAL USABLE FACILITIES ARE NEEDED ON LAKE ROOSEVELT, BUT COSTS SHOULD BE A MAJOR FACTOR IN ANY PROJECT. IT WOULD BE HARD TO JUSTIFY EXPENSIVE FACILITIES IN RELATION TO THE SHORT SEASON. KEEP IT SIMPLE NOT EXPENSIVE.

THANK YOU



CARL J MATTSON

COMMENTS

RESPONSES

Jim Pritchard

January 25, 1999

Vaughn Baker, Superintendent
Lake Roosevelt National Recreation
1008 Crest Drive
Coulee Dam, WA 99116

Re: Draft General Management Plan

Dear Vaughn,

As a long time board member and a past president of the Lake Roosevelt Property Owners Association and very active participant in the Lake Roosevelt Forum, you and your staff are to be commented on your draft General Management Plan. I am, however, concerned about some of the factors, on page 29, to be considered in evaluating community access proposals.

RECEIVED
JAN 27 1999
L.R.N.R.A.

A

Please consider clarifying item one by adding the word "only" to the end of the paragraph. There may be situations in which there are only a few adjoining property owners but a large number of other folks who would want access to the proposed launch site.

B

Item 4 Access roads--Sounds as though the NPS would require the County to upgrade the access road as a part of the approval process. In some good lake access points, it would not be economically possible to bring the access road up to County standards. I would like to see this item modified.

C

I seriously question item 8 which concerns the ability of the community to assume liability for public use of community provided and maintained facilities. These boat launches and boat slips will be on public lands; therefore, it seems the government would be liable.

D

The plans and specifications requirement needs to be modified to except existing facilities.

It is realized there will be implementation procedures developed after the approval of the General Management Plan; but, as an adjoining land owner, I want to see the authority of the NPS more restricted in this basic document.

I do support Alternative 1.

Sincerely,
Jim Pritchard
Jim Pritchard

copy: Senator Gorton
Congressman Nethercutt

JIM PRITCHARD

- A We believe the wording as proposed addresses your concern. Community access points would not be approved if they only (or primarily) serve a small number of individual property owners.
- B Factor 4 regarding county roads was included because the development of access points would affect the county road system in many instances. This factor gives the counties the opportunity to determine what impacts a proposed access point would have on their road system and whether reasonable public access would be available.
- C The nature of liability will depend on several factors including who builds and maintains the facilities. As a general rule, the National Park Service is required to take appropriate steps to limit the liability of the United States arising from the provision of facilities that are built and maintained by others.
- D All facilities, both existing and future, that are available to the public will have to comply with applicable laws and regulations regarding safety, access for the disabled, etc. The National Park Service does not have the authority to exempt existing facilities from compliance with these requirements.

COMMENTS

RESPONSES

Comment Form

Dear Sirs,

Dec. 23, 1998

I am sorry I missed your public meeting when you were up in Kettle Falls, but I had a conflict of meetings; so I will take advantage of your comment form.

My largest concern is that we need to protect the single most singular resource that separates Lake Roosevelt from most other large lakes that is open beaches of public domain. This must be protected with a vengeance and as the public trustee it is your job to do so. What I fear of is that one at a time piece by piece we are losing this when taken singularly one at a time they make good sense but it is the total effect that needs to be guarded. Seven Bays subdevelopment went in and the public builds a boat launch, then Lincoln, now it is Crescent Bay and the one above Keller. I know there is political pressure, but as stewards of the land you must preserve the unique qualities of Lake Roosevelt.

I heard that there was discussion of "stack water areas" and the proposal of the large shallows just north of the mouth of the Colville River "Old Kettle Area". I support this idea. With the advent of the personal water craft the rules have changed and we must become aware of the potential impact that they may have. I know that we must accommodate their use but it must be appropriate.

I have been boating on Lake Roosevelt since 1958 and probably know it better than most around. If I can be of assistance to you in the planning process I am more than willing to help.

Sincerely John Ridlington,



JOHN RIDLINGTON

- A Although this area was discussed as a possible candidate for designation as a passive water management area, we are not proposing that designation at this time. However, the National Park Service does have the authority to establish controls on the operation of any type of craft on land or water where sensitive resources might be damaged by uncontrolled use. If the resources in the area mentioned are being damaged, additional controls can be added at any time.

Comment Form

Comments submitted in regards to the General Management Plan for Lake Roosevelt National Recreation Area.

The GMP does not adequately address the affect the plan will have on the present day cultural resources. The custom and cultural activities of present day residents are just as important as the cultural activities of the Native American people of the past. European man has historically made many contributions to this area including the creation of Lake Roosevelt. Agriculture was one of the major reasons the dam was built, Banks Lake was created, and the Columbia Basin Project was started. If the NPS recognizes the value of the Native American culture then the culture of the European American should be equally recognized. There is no recognition of the cattlemen herding their cattle along the river shores on their way to Fort Spokane or to the mining camps to the North. No mention of the reason Fort Spokane was established to protect the farmers, ranchers, and miners of this area.

A

The GMP does not address encroachment of the visitors on the private property owners and the destruction of private property by visitors trying to access the LRNRA. On page 33 the explanation of dispersed recreation areas is misleading and could be confusing to the public which is not familiar with the NPS boundary. The statement listed in the GMP stated, "visitor's would experience a primarily natural landscape," could lead visitors to think adjoining private lands are part of the natural landscape and are available for their recreational activities. This in addition to the highlighting of private lands adjoining the LRRA on the map inserts listing the different areas as dispersed recreational areas could be misleading to the public. It also could be misinterpreted as the viewshed being under the NPS management.

B

Much of the lands highlighted as dispersed recreational areas are actually agricultural lands. Agriculture is not a dirty word, yet your GMP has almost completely avoided addressing agriculture. On page 148 under the management and regulation of the LRNRA, it states management or regulation shall not interfere with or be inconsistent with the purposes for which the Columbia Basin Project was established. The Columbia Basin Project Act Section 4 clearly states the project was for the purposes of assisting the permanent settlement of farm families. The government made promises to the citizens who came to settle the Columbia Basin Project. Permanent settlement does not mean until the NPS decides recreational use takes priority over agriculture uses.

C

The GMP contains no analysis of the impacts on small entities as required by the Regulatory Flexibility Act and the Small Business Regulatory Enforcement Fairness Act.

D,E

The elimination of agricultural uses would clearly have a serious adverse impact on the small agricultural operation adjoining the LRNRA. The GMP does not contain the socio-economic analysis of the different alternatives or actions. The GMP has not addressed other alternatives to agricultural special use permits being continued.

C. RONALD ROSENBERG

A We will continue to educate visitors to the recreation area of the land status and the fact that much of the land upland from the immediate vicinity of the shoreline is private property. The maps in the draft management plan contain the following disclaimer: Because the NRA public lands (shown in yellow) are quite narrow, it was difficult to show management areas on a map. The wide bands of color shown depict only the management and use of the NRA public lands and waters. The colored bands are not intended to show management or use of any private, other agency, or tribal lands.

Although these maps are intended for planning purposes and would not be used in general visitor information, we appreciate the concern and will revise the maps in the final plan to show management areas only on the public lands.

B See summary comment A.

C The general management plan is not proposing any changes in existing law, regulation, or policy with regard to grazing or other agricultural uses on public lands (see summary comment A). Therefore, an analysis of impacts on small entities such as ranchers and farmers with regard to these issues is not required.

D Impacts on the socioeconomic environment are discussed in the draft plan beginning on page 104.

E The draft management plan did not identify alternatives where agricultural uses could continue because the authority for such uses on the public lands within the national recreation area does not currently exist. See also summary comment A.

COMMENTS

RESPONSES

Comment Form

The GMP does not address the Riparian Water Rights of the adjoining land owners. Under the riparian system, the owner of the land that borders a lake or stream has the right to reasonable use of the water. Congress has recognized the rights and custom under the *Desert Land Act of 1877*.

The GMP proposed requirements for community docks are unrealistic. The small communities could not financially afford to update and maintain the docks under the standards stated in the GMP. The NPS does not have the funds to build and maintain docks and launch ramps within the LRRRA to conform to these standards it is unrealistic to require small communities to comply. The GMP does not adequately address the economic impact the GMP and the actions of the NPS will have on these small communities as required under the Regulatory Flexibility Act.

The NPS allowed docks under previous special use permits. These docks were established by these communities and have contributed to the improving of their property values. The GMP contained no economic analysis of the impact the removal of the docks would have on property values. The lowering of property values would in turn affect the county as far as tax revenues. Again, the NPS needs to review the purposes of the Columbia Basin Project to have people come and settle this area establish communities, farms, and ranches.

C Ronald Rosenberg



Cc:
Congressman George Nethercutt
Senator Slade Gorton
Senator Patty Murray

COMMENTS

RESPONSES

Comments on General Management Plan for Lake Roosevelt by National Park Service.

Lake Roosevelt was created for flood control, development of agricultural interests, and for hydro-electric power. I want to see the agricultural interest along the shores of Lake Roosevelt continue to prosper. When the Columbia Basin Project was started the government made promises to the farmers that came to settle this area that they could make permanent settlements within the Columbia Basin. The government encouraged the establishing of the farms and ranches by providing water and allowing the use of the project lands for agricultural activities. The management plan states it does not have the authority to allow agricultural activities, yet the main reason The Columbia Basin Project was created was for agricultural production. The National Park Service must remember that Lake Roosevelt is part of the Columbia Basin Project.

A As a young rancher, I feel the government has not honored it promises to the agricultural producers under the Reclamation Act and the Columbia Basin Project Act. The permanent settlement of farm families as stated in the Columbia Basin Project Act should be honored by all government agencies and farm families should not be forced out of business by the actions of NPS for recreation. I am a 5th generation farmer/rancher I want to be able to continue to operate my family farming enterprise. If the government honors the treaties with the Native Americans then it should also honor the promises it made the American citizens that came west to settle the farms and ranches.

B The GMP does not address the impacts the actions of the NPS have will on the small farms and ranches adjoining Lake Roosevelt as required under the Regulatory Flexibility Act. If the NPS eliminates agricultural permits I will be adversely impacted if not forced out of business.

Dan Rosenberg
Dan Rosenberg

Cc:
Congressman George Nethercutt
Senator Slade Gorton
Senator Patty Murray

DAN ROSENBERG

- A See summary comment A.
- B See comment C above in this letter.

COMMENTS

RESPONSES

Comment Form

11/9/98

Your plan lacks specific detailed tasks & goals you need or want to accomplish.

A You totally ignore the fishery, because you say that is the responsibility of Dept. Fish & Wildlife. This is supposed to be a overall management plan for the Lake, not how to keep you or ensure that your Dept has a job.

B You have talked about access via boat launches during the water draw, of which there is none. What are you specifically going to do?

Please step out and be more definitive & aggressive in your plan. At the least try

Herman Stark

HERMAN STARK

- A The management of the fishery on Lake Roosevelt is a very complex issue that goes far beyond the scope of this plan. Fisheries on the Columbia River System, of which Lake Roosevelt is a very small part, have national and international ramifications. Any final resolution of their management will require the participation of many federal, state, tribal, and foreign governmental entities. The scope of this plan addresses only the areas contained within the NRA boundary. Please see "Issues beyond the Scope of This Management Plan" on page 15 of the draft and the subsection on "Fishery Management" on page 18 of the draft for additional discussion.
- B The National Park Service has an ongoing program to extend and improve launch ramps where possible. The launch ramp at Hawk Creek was extended and the parking lot paved during the summer of 1998. In the past 10 years many ramps have been extended or new ones constructed. Extending ramps to very low water levels can be problematic given the uncertainties of lake levels, obtaining funding in a timely manner, etc. Most existing ramps are at or near their practical limits. Extending ramps below the 1,220-foot level is very questionable due to the infrequent periods that the lake is actually drawn down that far.

See also summary comments E and G.

Comment Form

A *Wish I had more time to comment sooner. I am wondering what happened to the Lake Roosevelt Forum as a viable tool for NPS public outreach and dialogue. It appears from your document that the Forum does not exist. Is it no longer a part of your planning process to use and acknowledge large segments of the public? Perhaps I missed something in the documents and if so please let me know where I can find reference to the Forum as a regional public group engaged in NPS issues and programs.*

Thanks. In my present work in the upper Mississippi River Watershed I often compare and contrast multi-faceted resource management and public involvement programs. The NPS Miss Nat'l River and Recreation Area staff are very active metro-wide here in the Twin Cities.
Louise Watson

LOUISE WATSON

- A You are correct that there are no references to the Lake Roosevelt Forum in the draft management plan. During the development of the draft plan, it was not certain whether the forum would continue to exist and what role it might play. We can now happily report that the forum will continue to play an important role in public involvement and education related to Lake Roosevelt.

COMMENTS

RESPONSES

Comment Form

- A #1- Consider passive water down river from Little Falls Dam one mile instead of the proposed four miles - There are no homes on either side of the river for the lower four miles - In the spring when the water is low, the current is in excess of 10 miles per hour - It would be impossible to get up the river without making a wake -
- #2- Because of the high volume of people on the Spokane Arm, I feel the boat-in-campgrounds at Crystal Cone and Anderson should be removed. These campgrounds were put in in the 1980's without informing adjacent landowners. They are an extreme fire hazard from the middle of July to October - There are no roads into these areas should a fire start -
- #3- A reservation program or system like the State Parks have would help eliminate boat crowding on the camp sites during the summer - Setting a limit on the amount of people per camp site -

Mr. & Mrs. Dave Zinecker

MR. AND MRS DAVE ZINECKER

- A Designation of an area as passive waters does not mean that the whole area would be classified as a no-wake or nonmotorized zone. Individual management prescriptions would be developed for each area that would specify the appropriate restrictions. A range of alternatives would be explored to determine the best management solution for a particular area. In some instances this could mean just a slower speed limit, or some type of seasonal restriction. In others, it might be more restrictive.

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National Park Service
Bureau of Reclamation
Bureau of Indian Affairs

Tribal Governments

The Confederated Tribes of the Colville Reservation
The Spokane Tribe of Indians

State and Local Governments

Grant County
Lincoln County
Stevens County
Ferry County

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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 wise 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 ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for the public lands and promoting citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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NATIONAL PARK SERVICE
Lake Roosevelt National Recreation Area
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