

May 12, 2004

Judi Danielson, Chair  
Northwest Power and Conservation Council  
851 SW 6th Avenue, Suite 1100  
Portland, OR 97204-1348

Subject: Support for and Approval of Lower Snake Subbasin Plan

Dear Chair Danielson,

The Pomeroy Conservation District has been working for over a year with others involved in our subbasin to develop the Lower Snake Subbasin Plan. District staff and board members provided significant guidance throughout the process, from policy-level decisions to discussion of specific language. A public review draft of the Lower Snake Subbasin Plan was distributed on April 12, 2004, with the public comment period closing on April 23, 2004. Public comments have been addressed in the plan, as appropriate.

During our meeting on May 11, 2004, the Pomeroy Conservation District approved submittal of the Lower Snake Subbasin Plan to the Northwest Power and Conservation Council. This plan represents a joint effort on behalf of local stakeholders to identify priorities for aquatic and terrestrial species habitat restoration and protection. These priorities are scientifically-based, take into account local opportunities, and attempt to balance issues of concern for various stakeholders.

We approved this plan to guide the expenditure of Bonneville Power Administration (BPA) project funding through the Northwest Power and Conservation Council's Fish and Wildlife Program for the next several years. The Pomeroy Conservation District does not view this plan as the subbasin's Endangered Species Act (ESA) compliance plan for listed species (aquatic or terrestrial), but agrees that it will inform the ESA compliance process that is being conducted through other planning efforts such as the Snake River Salmon Recovery Plan.

This plan is provided with the recognition that additional refinements and scientific understanding is needed. New information and plan implementation over time will likely result in updated priorities and strategies. Further, significant cooperation will be needed by local landowners to implement this plan. The District is providing this plan with the understanding that private landowners will be involved on a voluntary basis.

The following components of the plan are three areas of special importance for the District:

- The need for a detailed socioeconomic study identifying the potential benefits/impacts of implementation is identified as a need within the plan. Understanding that such data is limited, the District concurs with the need to fill this data gap to ensure that local socioeconomic conditions are not negatively impacted by plan implementation and to highlight those areas where plan implementation can benefit local socioeconomic conditions.
- Collecting current baseline data as identified in the research, monitoring, and evaluation component of the plan will be vital to enable the subbasin to track progress and successful implementation.

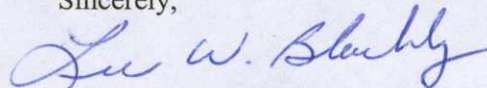
- Causes for limiting factors were identified in the plan based upon best professional judgment. Development of quantitative data regarding causes of habitat impairment is identified as a research priority within the plan. The District concurs with the need to fill this identified data gap to ensure that projects are being implemented to address the root causes of habitat impairment in priority areas.

While the District agrees with the majority of information provided in the plan and its general direction regarding enhancement of aquatic and terrestrial habitats, we would like to highlight the following concerns:

- Outdated information/data within the plan should be updated, corrected, and/or clarified (e.g. Conservation Reserve Program acreage values for the Alpowa drainage are listed as 1981 data).
- It is unclear whether BPA project funding will be contingent upon private landowners allowing public access on their property. The relationship between project implementation and public access should be clarified.

We anticipate that these concerns will be addressed by ongoing discussions in the appropriate forum. We look forward to the opportunity for further refinement of the Lower Snake Subbasin Plan and the benefits that will be achieved through its implementation.

Sincerely,

A handwritten signature in blue ink that reads "Lee W. Blunby". The signature is written in a cursive, flowing style.

Pomeroy Conservation District Board Chairman