

Indian Tribes — IT

COMMENT IT 01



THE CONFEDERATED TRIBES
of
THE COLVILLE RESERVATION
POST OFFICE BOX 150-NESPELEM WASHINGTON 99155 PHONE (509) 634-4711

April 4, 2003

Mr. Jim Blanchard
Special Projects Officer
Bureau of Reclamation
32 C Street, P.O. Box 815
Ephrata, WA 98823

RE: Comment to Banks Lake Drawdown Draft Environmental Impact Statement (Draft EIS)

Dear Mr. Blanchard:

Unlike the unstable and eroded Columbia River valley, the Upper Grand Coulee was abandoned as a glacial lake spillway about 10,500 B.C. Since then, the Upper Grand Coulee remained fairly stable until the filling of Banks Lake in 1951. The cultural significance of the Upper Grand Coulee lies in the fact that land surfaces along the floor of the coulee are 6,000 years older than any of the landforms along the Columbia River other than the higher terraces. Landforms around Banks Lake have the potential to extend the regional cultural historical record back to the Late Pleistocene/Early Holocene boundary. The landforms in and around Banks Lake have the potential to contain occupation sites that relate to some of the earliest time frames and, in fact, the area could contain Clovis-age and pre-Clovis age sites.

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Upper Grand Coulee potentially contains sites relevant to the oldest traditions of the Colville Confederated Tribes (CCT). Protection and understanding of these sites is in the interest of the CCT. Conceptually, the proposed undertaking should have no adverse effects. The CCT recognizes there will be adverse effects. If effects are not mitigated or avoided, the CCT may have to litigate for compensation. Therefore, the History/Archaeology Program requests consultation with Bureau of Reclamation (BOR) staff on their idea of and position on their trust responsibility to the CCT.

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The CCT History/Archaeology Department reviewed the Draft Environmental Impact Statement (DEIS) for the Banks Lake Drawdown and has several comments.

1. According to the Federal Register 66(80):20832, a drawdown of at least 10 feet in Banks Lake could occur annually. The DEIS does not include the fact that the 10 foot drawdown could be an annual occurrence.

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2. *A Class III Archeological and Historical Inventory of the Banks Lake Project Area* (Draft) by Stephen C. Hamilton and Brent Hicks prepared in 2000 is cited in the body of the DEIS and listed in the bibliography. This document has been updated to include the further survey and testing mentioned as being incomplete in your DEIS

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The cultural resources reports *A Class III Archeological and Historical Inventory of the Banks Lake Project Area* (Draft) by Stephen C. Hamilton and Brent Hicks prepared in 2002 and *A Class III Archaeological, Historical, And Traditional Cultural Properties Inventory of The Banks Lake Fall 2002 Drawdown Zone, Douglas And Grant Counties, Washington* (Draft) by Martin Engseth prepared in 2003 need to be included in the cultural resources studies section for the final EIS.

3. Historic Resources, Page 3-43, identifies two properties listed on or determined eligible “for listing on a historic register...” This line should read “for listing on the National Register of Historic Places...” The section fails to mention that until determined otherwise, all historic properties are treated as though they are eligible to the National Register. Failure to mention that the hundreds of sites in the Banks Lake vicinity are treated as if they are eligible gives the public, the CCT, and the agency the impression only the two sites mentioned might require further action.

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4. Traditional Cultural Properties, Page 3-44, mentions a 1997 TCP study. There is no mention that there were in fact two TCP documents prepared, an inventory presented in tabular form with a minimum of explanatory text and a draft narrative TCP study (citations withheld, see next paragraph). These documents do in fact identify 20 TCPs. The DEIS fails to note that the first of these places includes the entire Upper Grand Coulee. As with comment No. 3 above, failure to identify a fuller understanding of the spectrum of cultural resources may mislead the public and BOR as to potential future investigations; it fails to represent the interests of the CCT.

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Both TCP documents mentioned above are confidential statements in support of proper resource management. They are not cited in the DEIS bibliography. Confidential documents cannot be released to the public, but not to identify and characterize the nature of such documents fails to display the management efforts of the CCT and the BOR to date.

5. Factors that might affect differences in the Action Alternative and the No Action Alternative such as the inability to refill Banks Lake by a deadline date, mechanical pump problems, low water years, high water years, energy demand issues, and maintenance requirements are not adequately addressed in these alternatives or in the operational scenarios within the alternatives.

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6. Due to the date of preparation of the DEIS, recommendations made in the various cultural resource surveys are not adequately addressed in either of the two alternatives presented. The results of the fieldwork conducted in the last two years may affect decisions within these two alternatives regarding Section 106 compliance.

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7. More specifically, in Chapter 4, Environmental Consequences, Historic Resources and Traditional Cultural Properties, Pages 4-34 and 4-35, neglects the impact of recreation on cultural resources. There is little doubt that a 10 ft. drawdown during the peak of tourist season will attract or invite heavy visitation along the drawdown zone. Visitation will lead to intentional or innocent collection of artifacts, perhaps even stimulating organized looting of cultural deposits.

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8. There is inadequate discussion of TCP studies in the DEIS. In fact on page S-7 under the "Continuation of Existing Trends" in the No Action Alternative there are TCP impacts that will require consultation with the CCT.

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Sincerely,



Adeline Fredin
Tribal Historic Preservation Officer

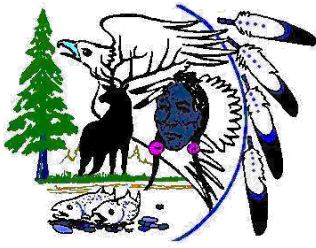
Cc: project files
Chrono

COMMENT IT 02

From: "Deanne Pavlik" <deannep@spokanetribe.com>
To: <jblanchard@pn.usbr.gov>
Date: Fri, Apr 11, 2003 9:14AM
Subject: Banks Lake EIS Comments

See attached.

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Comments on the Banks Lake Environmental Impact Statement

Concerns primarily arise concerning lack of clarity surrounding the refill of Banks Lake from Lake Roosevelt. The purpose of the EIS is to describe and analyze the Bureau of Reclamations proposed action to lower the August surface elevation of Banks Lake. The area included in the draft EIS consists of the “actual lake and its surrounding areas”. The reliance of Banks Lake on Lake Roosevelt for water suggests that Lake Roosevelt should be included as a “surrounding area”.

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However, the EIS does not address potential effects of changed hydro-operations at Grand Coulee Dam. Changes in hydro-operations in Lake Roosevelt shift water residence times, elevation, outflow, etc, which directly impact the biota of Lake Roosevelt. For example, increased outflow through the 3rd powerhouse, as suggested in the proposed action for the month of August, has the potential to increase entrainment rates, resulting in greater losses of fish from Lake Roosevelt.

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How agencies intend to address competing needs for Columbia River water, including Banks Lake refill, flow augmentation for salmon, and Lake Roosevelt water residence time and elevation goals as currently identified in the Biological Opinion, are unclear. Refill strategies the Bureau of Reclamation intends to implement to ensure Banks Lake is refilled by the proposed deadline, and their potential effects on the reservoirs, have not been addressed. Of particular concern are strategies for refilling Banks Lake that may rely on greater releases from Lake Roosevelt, and the effects those strategies may have on Lake Roosevelt hydro-operations, water quality, and biota.

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