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Title: Restoration Director

Comments:

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Submitted electronically via Wallowa-Whitman National Forest website:

<https://cara.ecosystem-management.org/Public/CommentInput?Project=54261>

Andrea Holmquist c/o

Mark Bingman, Deputy District Ranger

Wallowa-Whitman National Forest

P.O. Box 905 Joseph, OR 97846

RE: Circle C Administrative Site Housing Project, Pittsburg Landing,
Hells Canyon National Recreation Area
Draft Environmental Assessment

Dear Ms. Holmquist and Mr. Bingman,

I am writing on behalf of the Greater Hells Canyon Council to comment on the Draft Environmental Assessment for an Idaho Power Company housing facility at the Circle C Administrative Site near Pittsburg Landing in Hells Canyon National Recreation Area.

We appreciate the opportunity to provide these comments.

Greater Hells Canyon Council (GHCC) is a grassroots conservation organization founded in 1967 (as Hells Canyon Preservation Council) to stop Hells Canyon and the Snake River from being dammed. Not only did we stop the dam, our work led to the creation of the Hells Canyon National Recreation Area. Our work now focuses on public lands management in the entire Greater Hells Canyon Region. We cover such diverse issues as logging, grazing, recreation, mining, species protection, wildlife connectivity, and more.

Our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

GHCC actively participates in Forest Service proceedings and decisions concerning the management of public lands and is an interested public regarding management activities within the National Forests and the Hells Canyon National Recreation Area (HCNRA).

Proposed Action

The Wallowa-Whitman National Forest is considering a proposal from Idaho Power Company (IPC) to construct a housing facility at the Circle C Administrative site located near Pittsburg Landing in the Hells Canyon National Recreation Area (HCNRA), Idaho on approximately 3.5 acres of National Forest System (NFS) land. The occupancy and use of National Forest System lands would be authorized under the terms and conditions of a special use permit issued to IPC. If approved, IPC would propose including the housing facility within the Federal Energy Regulatory Commission (FERC) project boundary as part of a FERC project license for the Hells Canyon Complex (HCC) (FERC Project No. 1971).

The proposed action includes construction, operation, and maintenance of the Circle C Administrative Site

Housing Facility, water supply system, and two informational kiosks. Total temporary ground disturbance of approximately 1.6 acres is expected to construct the proposed facilities. Approximately 0.67 acre would be permanently disturbed and maintained for the life of the proposed facilities.

Comments

The proposal would include significant excavation and construction activities. This would have a significant impact on Pittsburg Landing and the Hells Canyon National Recreation Area.

Unfortunately, we find the Draft Environmental Assessment (EA) for this project to be inadequate. We must disagree with the "Finding of No Significant Impact" determination of the Draft EA. We disagree with the determination that an Environmental Impact Statement is not necessary. We request the Forest Service will publicly release the specialists' reports that contributed to the basis for this Draft EA.

We continue to question the need for this project. As stated in the Draft EA, "Currently, IPC works closely with the outfitter community distributed throughout Hells Canyon for various lodging needs." We encourage the Forest Service and Idaho Power Company to continue to work with and support local business-people to provide lodging. Hells Canyon National Recreation Area is visited by many people who manage to camp out or otherwise visit in accordance with the un-developed and primitive character of Hells Canyon. It is unnecessary and inappropriate for corporate interests to be allowed to construct a house on these special and important public wildlands.

Pittsburg Landing has very significant cultural and archaeological values. The Forest Service must comply with the National Historic Preservation Act (NHPA) and must adequately address any concerns raised by Native American tribes. The Forest Service must work with the Native American tribes as consulting partners to ensure appropriate compliance with NHPA.

Additionally, we are very concerned that our scoping comments were not addressed in the Draft EA.

We quote from our scoping comments as follows:

"An important focus of our mission at the Greater Hells Canyon Council (GHCC) is to see that the Hells Canyon National Recreation Area (HCNRA) is managed in a manner compatible with the HCNRA Act's objectives, including the:

Maintenance and protection of rivers, fish and wildlife habitat, archaeological, paleontologic, and historic sites, conservation of scenic, wilderness, cultural, scientific, and other values contributing to the public benefit and the preservation, especially in Hells Canyon, of all features and peculiarities believed to be biologically unique, including rare and endemic plant species, rare combinations of aquatic, terrestrial, and atmospheric habitats, and diverse ecosystems. 16 U.S.C. § 460gg-4.

As detailed in our letters of June 28, 2018 and December 12, 2017 to Wallowa-Whitman National Forest Supervisor Tom Montoya, we have grave concerns that recent management activities in the HCNRA are not honoring these objectives.

We have repeatedly requested that the Wallowa-Whitman National Forest comply with the 2003 court ruling to promulgate new regulations and to meet the requirements of NEPA and the HCNRA Act. Unfortunately, our requests have not resulted in significant progress by the Forest Service on this important matter.

As stated in our letter of June 28, 2018, we believe any management decisions regarding activities within the HCNRA are invalid until new regulations are promulgated that meet the requirements of NEPA and the HCNRA Act.

We request that the Forest Service does not consider this proposal to issue the special use permit for Idaho Power Company at the Circle C Administrative Site until these new regulations are appropriately and legally

promulgated."

Conclusion

Greater Hells Canyon Council does not support this proposal. We urge the Forest Service to not allow Idaho Power Company to excavate, construct, and develop public lands in the Hells Canyon National Recreation Area. We urge the Forest Service to promulgate new regulations to meet the requirements of NEPA and the HCNRA Act. The Forest Service must work with the Native American tribes as consulting partners to ensure appropriate compliance with NHPA.

Pittsburg Landing is an important part of the HCNRA, and this proposed development on public lands for the convenience of a power company would create significant negative impacts to the environment of this unique area.

Thank you for considering our comments. Please do not hesitate to contact me with any questions.

We look forward to working with the Wallowa-Whitman National Forest to address these concerns and to ensure a bright future for the Hells Canyon National Recreation Area.

Sincerely,
Brian Kelly, Restoration Director
Greater Hells Canyon Council