October 3, 2006

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To Whom It May Concern:

This letter is to address the ISRP comments regarding the Nez Perce Soil and Water Conservation District (NPSWCD) 19901500.

The final ISRP comments cited the following concerns with our proposal:

The proposal has insufficient objectives (biological or physical).

The proposal provides little quantitative support of steelhead numbers.

The proposal tells little about restoration potential for steelhead.

The proposal does provide adequate evidence that installing BMPs will benefit the focal species.

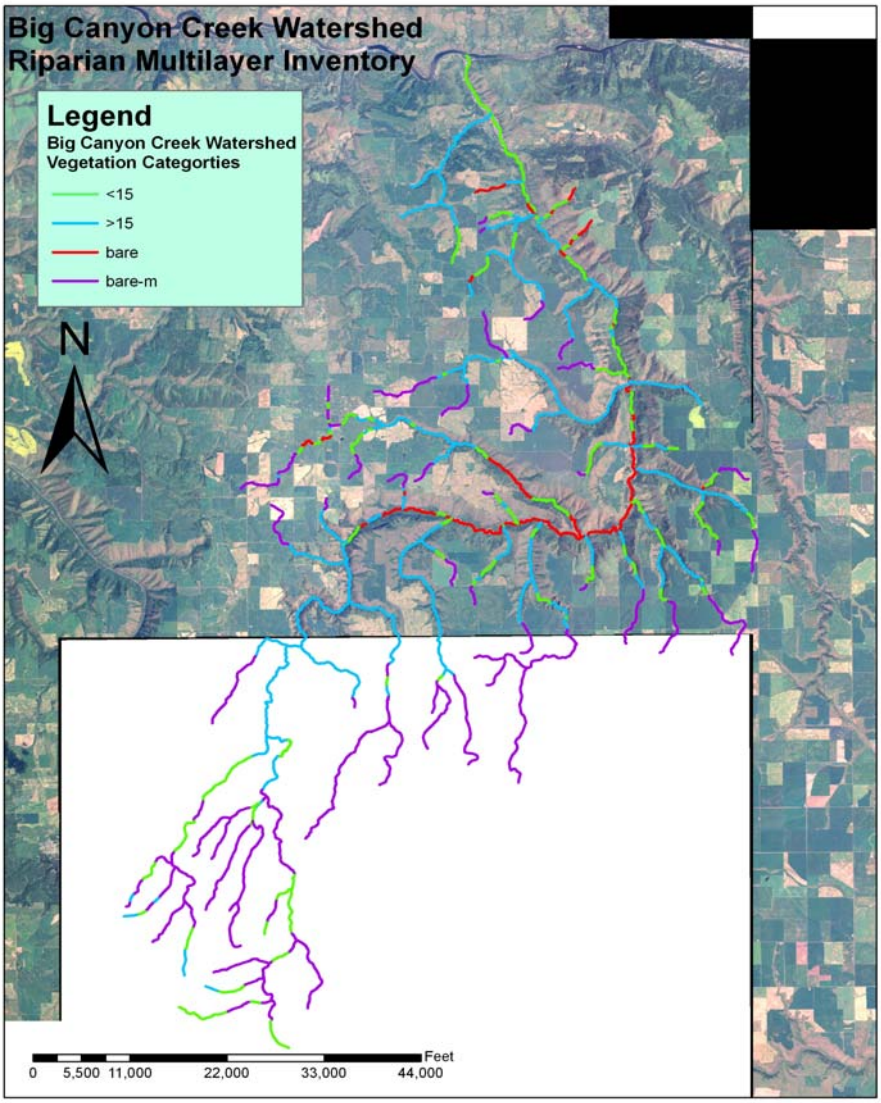
The proposal has insufficient objectives (biological or physical).

ISRP states that the NPSWCD does not have sufficient objectives. These are the objectives as stated in the original proposal.

Objectives:

1) Restore riparian cover, reduce stream temperature and improve in-stream complexity to 75% of the stream miles identified as bare or bare-m in the riparian multilayer inventory.

Figure 1. Riparian Multi-layer inventory.



2) Collect additional information to fill data gaps identified in the watershed assessment.

   Specific data gaps: sediment production estimates and instream channel characteristics. These data gaps will be identified through a stream inventory process. The goal is to complete 80 mile of inventory per year from 2007 to 2009.

3) Reduce surface erosion on cropland by 33% in the Upper Little Canyon, Upper Big Canyon, Cold Springs, and Posthole canyon tributaries.
4) Reduce surface erosion from rangeland by 58% in the Nichols, Flechter and Upper Big Canyon subwatersheds.
5) Reduce rural road rounoff on 50% of the identified priority areas. The highest number of roads occur in the Holes (9.99 miles), Middle Big Canyon (5.11 miles), Upper Big Canyon (3.99 miles), Cold Springs (3.45 miles) and Upper Little Canyon (2.98 miles).

The proposal provides little quantitative support of steelhead numbers.

During the development of this proposal in Dec 2005 – Jan 2006 no current steelhead data was available for Big Canyon Creek. The Nez Perce Tribe Department fisheries Resource Management Watershed Division released a report of juvenile steelhead distribution and abundance for Lapwai and Big Canyon Creeks. To answer questions raised by ISRP, this information was used in the response to Lapwai Creek. However, this information was not included for Big Canyon due to the earlier ISRP not addressing current distribution.

Eleven species of fish were identified from the 4,965 specimens captured (table 3). Paiute sculpin *(Cottus beldingi)* were the most abundant species observed, followed by speckled dace *(Rhinichthys osculus)* and steelhead/rainbow trout *(Oncorhynchus mykiss).* 0. *mykiss* constituted the highest species biomass within Big Canyon Creek. One chinook salmon *(Oncorhynchus tshawytscha)* identified at stream kilometer 3.59 (near the confluence of Little Canyon Creek) constituted the only other salmonid species noted.

Big Canyon Creek 0. *mykiss* densities averaged 0.11 fish/m2. *O. Mykiss* Present in 16 of 26 sites surveyed, the highest 0. *mykiss* site densities were noted at stream kilometer 14.58 with 0.53 fish/m2. Age class composition of Big Canyon Creek 0. *mykiss* was largely structured as would be expected of summer populations of anadromous steelhead within rearing streams, being primarily composed of subyearling parr with a moderate number of residual yearlings and few sexually mature adults (2 year +).

Figure 5. Big Canyon Creek *O. mykiss* Distribution

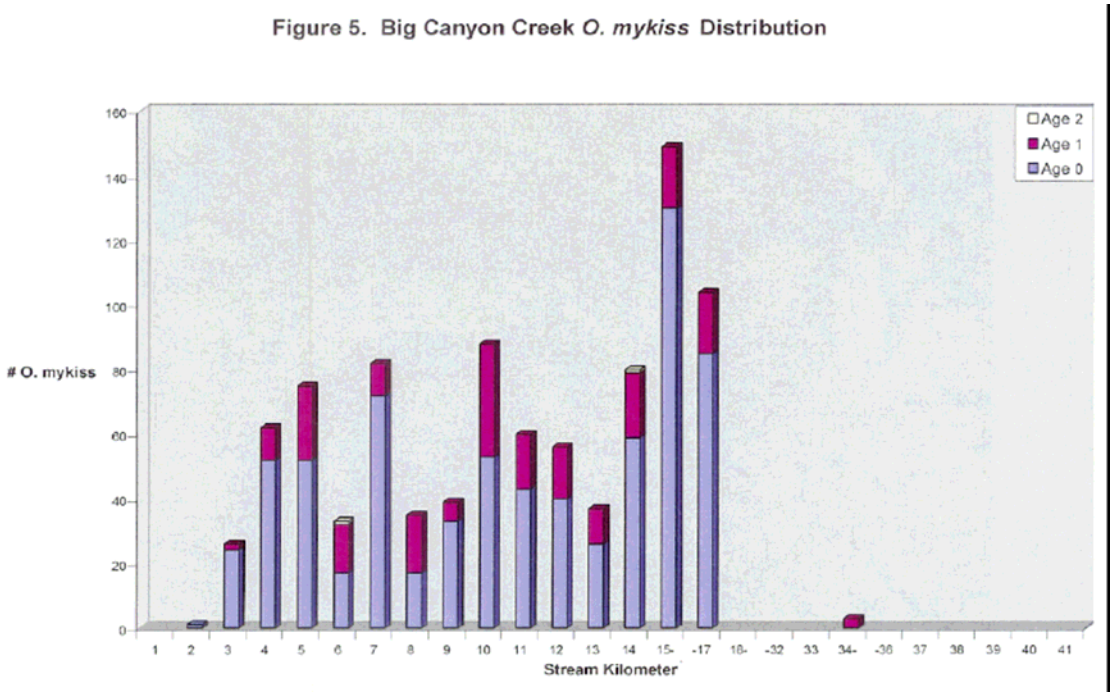
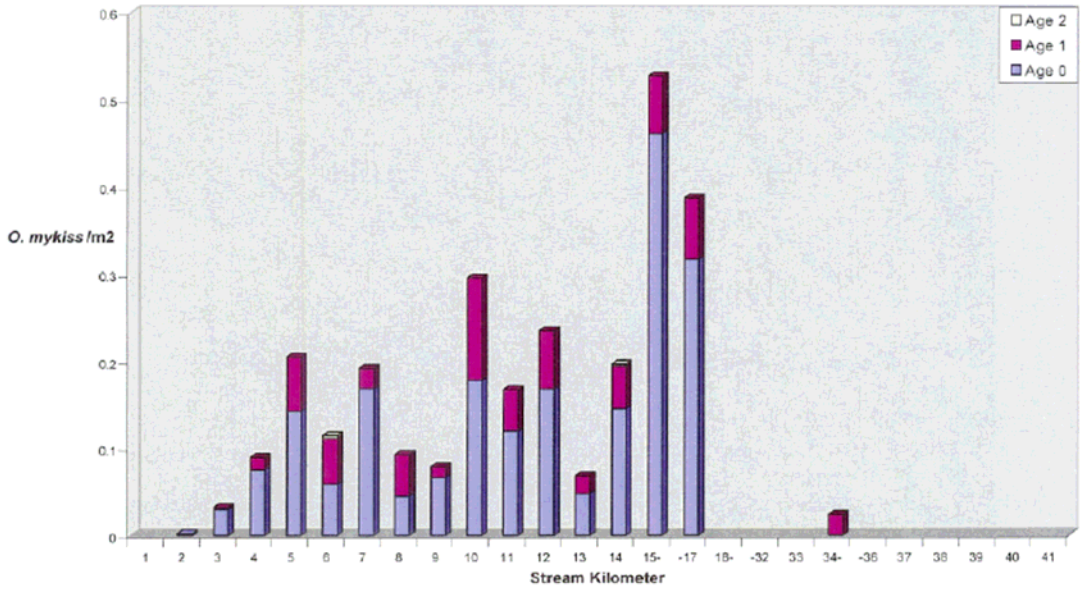


Figure 6. Big Canyon Creek *O. mykiss* Density (area)



The proposal tells little about restoration potential for steelhead.

Big Canyon Creek has been identified in a number of published assessments management plans as being a major steelhead producing stream in the lower Clearwater River subbasin. The Interior Columbia Technical Review Team (ICTRT) lower Clearwater Mainstem Summer Steelhead Population Viability Assessment (2006) identified Big Canyon Creek has having high intrinsic potential for steelhead spawning. This document also identified Big Canyon Creek as the third largest steelhead spawning areas in the lower Clearwater River.

The Federal Columbia River Power System Biological Opinion (FCRPS) (2004) states the Big Canyon Creek, Little Canyon Creek, and the Potlatch River are the primary fish-producing (steelhead) areas for the lower Clearwater subpopulation. The FCRPS Index for Qualitative Assessment of Potential to Improve/Increase Habitat is high based on the numerous anthropogenic changes that could potentially be remedied.

The Clearwater Subbasin Assessment (2003) notes that Big Canyon is listed as one of two notable exceptions of good steelhead habitat remaining in the lower Clearwater River.

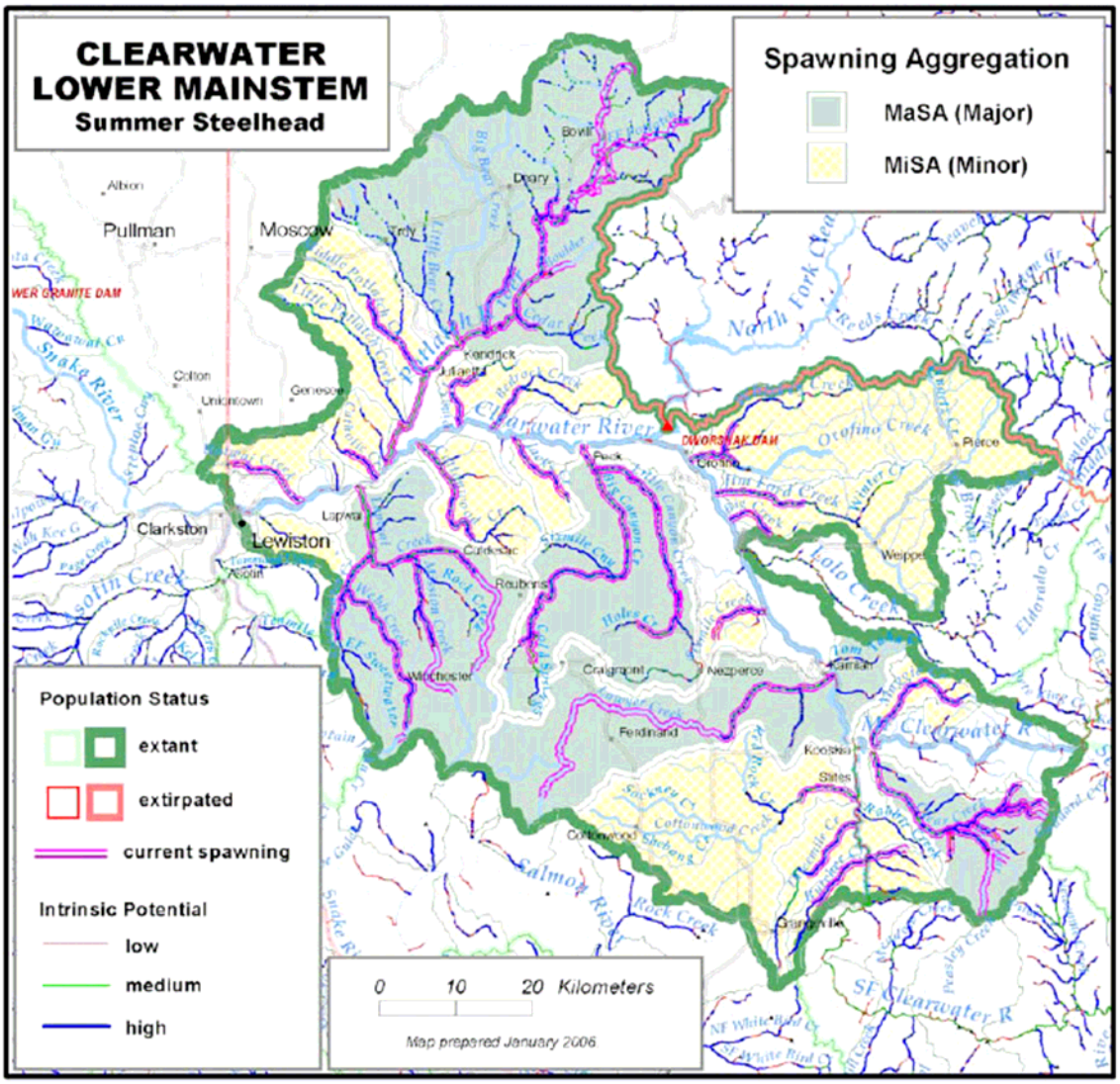


Figure 1. Clearwater Lower Mainstem steelhead major and minor spawning areas.

The does provide adequate evidence that installing BMPs will benefit the focal species.

Limiting factors for steelhead identified for the Big Canyon watershed include: low stream flows and a lack of adequate multi-layered riparian vegetation (CBFWA 1999, Clearwater Subbasin Management Plan 2003, Kucera 1985). Additionally CBFWA (1999) identified sediment, nutrients, and bacteria from existing land-use practices are adversely impacting water quality. To address these limiting factors, the NPSWCD proposal would install BMPs.

Significant evidence exists about success of improving fish abundance using the implementing of BMPs. Most of the published research that has been published relies on comparing change in fish abundance (pre and post restoration) or comparing restored streams to reference streams. Wang et al 2002 reported that BMP's including: (riparian fencing, waste storage facilities, and stream buffers) improved trout populations compared to reference streams. Additionally, they reported that riparian BMP's showed significant increased in densities of fish. Knapp and Mathews (1996) found that grazing had a negative effect on golden trout densities. Stuber (1985) found that three years after excluding livestock from the stream, that the standing crop of trout doubled. Keller and Burnham (1982) found higher numbers of catchable trout in ungrazed verses grazed sections of stream.