

STREAM NAME	STARTING FROM:	GOING TO:	TRIBUTARY TO	PROTECTED FERC CATEGORY NUMB	LENGTH (MI)
POTLATCH R	CORRAL CR	LITTLE BOULDER CR	CLEARWATER R	D	2.0
LITTLE BOULDER CR	MOUTH	HEADWATERS	POTLATCH R	U	0.0
POTLATCH R	LITTLE BOULDER CR	POTLATCH R, E FK	CLEARWATER R	D	3.7
POTLATCH R, E FK	MOUTH	RUBY CR	POTLATCH R	D	3.7
RUBY CR	MOUTH	HEADWATERS	POTLATCH R, E FK	U	4.0
POTLATCH R, E FK	RUBY CR	HEADWATERS	POTLATCH R	A	14.0
POTLATCH R	POTLATCH R, E FK	MOOSE CR	CLEARWATER R	D	0.4
MOOSE CR	MOUTH	HEADWATERS	POTLATCH R	U	0.0
POTLATCH R	MOOSE CR	HEADWATERS	CLEARWATER R	D	9.2
CLEARWATER R	POTLATCH R	COTTONWOOD CR	SNAKE R	C	4.0
COTTONWOOD CR	MOUTH	HEADWATERS	CLEARWATER R	D	20.3
CLEARWATER R	COTTONWOOD CR	PINE CR	SNAKE R	C	4.3
PINE CR	MOUTH	HEADWATERS	CLEARWATER R	A	9.1
CLEARWATER R	PINE CR	BEDROCK CR	SNAKE R	C	2.9
BEDROCK CR	MOUTH	LOUSE CR	CLEARWATER R	A	4.9
LOUSE CR	MOUTH	HEADWATERS	BEDROCK CR	U	11.2
BEDROCK CR	LOUSE CR	HEADWATERS	CLEARWATER R	U	5.0
CLEARWATER R	BEDROCK CR	JACKS CR	SNAKE R	C	3.7
JACKS CR	MOUTH	HEADWATERS	CLEARWATER R	U	2.3
CLEARWATER R	JACKS CR	BIG CANYON CR	SNAKE R	C	5.3
BIG CANYON CR	MOUTH	LITTLE CANYON CR	CLEARWATER R	D	2.7
LITTLE CANYON CR	MOUTH	HOLES CR	BIG CANYON CR	D	17.9
LONG HOLLOW CR	MOUTH	HEADWATERS	LITTLE CANYON CR	U	15.1
HOLES CR	MOUTH	HEADWATERS	LITTLE CANYON CR	A	8.0
BIG CANYON CR	LITTLE CANYON CR	COLD SPRINGS CR	CLEARWATER R	D	28.0
COLD SPRINGS CR	MOUTH	HEADWATERS	BIG CANYON CR	D	8.8
BIG CANYON CR	COLD SPRINGS CR	HEADWATERS	CLEARWATER R	A	5.0
CLEARWATER R	BIG CANYON CR	CLEARWATER R, N FK	SNAKE R	C	6.4
CLEARWATER R, N FK	MOUTH	DWORSHAK RES	CLEARWATER R	D 10045-00	1.0
CLEARWATER R, N FK	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R	U	0.0
DICKS CR	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R, N FK	U	7.3
DICKS CR	DWORSHAK RES	HEADWATERS	CLEARWATER R, N FK	U	5.2
CLEARWATER R, N FK	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R	U	10.5
LONG MEADOW CR	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R, N FK	U	5.8
ELK CR	DWORSHAK RES	LAKE INTERIOR REACH	LONG MEADOW CR	U	1.0
ELK CR	DWORSHAK RES	BULL RUN CR	LONG MEADOW CR	U 08524-05	2.1
BULL RUN CR	MOUTH	SHATTUCK CR	ELK CR	U	4.8
SHATTUCK CR	MOUTH	HEADWATERS	BULL RUN CR	U	5.2
BULL RUN CR	SHATTUCK CR	HEADWATERS	ELK CR	U 10115-00	5.2
ELK CR	BULL RUN CR	HEADWATERS	LONG MEADOW CR ?	U ?	17.2
LONG MEADOW CR	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R, N FK	U	0.2
LONG MEADOW CR	DWORSHAK RES	HEADWATERS	CLEARWATER R, N FK	U	11.9
CLEARWATER R, N FK	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R	U	5.8
CRANBERRY CR	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R, N FK	U	0.7
CRANBERRY CR	DWORSHAK RES	HEADWATERS	CLEARWATER R, N FK	U	5.8
CLEARWATER R, N FK	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R	U	7.5
REEDS CR	DWORSHAK RES	LAKE INTERIOR REACH	CLEARWATER R, N FK	U	2.2
REEDS CR	DWORSHAK RES	QUARTZ CR	CLEARWATER R, N FK	U 07851-00	4.8
				07855-00	

(POTLATCH)

PA 000420

3197 Lundquist Lane  
Moscow, Idaho 83843  
January 18, 1988

Cnl  
RA  
PP  
Jm\*  
BF

Mr. James A. Goller, Member  
Northwest Power Planning Council  
Statehouse Mall, Tower Building  
Boise, Idaho 83720

Dear Mr. Goller:

I am writing you in response to your letter of November 18, 1987, and to a contact I made on January 12, 1988, at your office with Ms. Beth Heinrich regarding information on protected area designation of certain streams in Idaho. I appreciated very much the efficient and thorough response to my specific questions. I wish now, I had taken the time to talk with you personally.

I do want to make my recommendations regarding the proposed action of the Council and the Idaho Fish and Game Department to impose protection from future hydropower development on reaches of certain streams in Idaho. Before doing so, let me tell you my background and why I think you should give careful consideration to my recommendations. I have spent 40 years in Idaho most of which was in the employ of the of the State as a Research Professor of Civil Engineering involved in the water resources of the State. From 1975 until I retired in 1983 most of my time was spent in research concerned with hydropower development. Previous to that I had much indirect input into the development of the Idaho Water Plan. At present I do a small amount of consulting, advising hydropower developers in the State.

I am pleased that the Northwest Power Planning Council has, through its staff, cooperating agencies and contractors made the effort to accumulate the hydropower data base and has attempted the classification they have made. I have done similar work in a study for the U.S. Department of Energy. By a necessity much of the work of making the classification has to be done with maps and the people doing it often do not have field data and field experience on which to make the determinations they make. As a result there can be classifications made that rule against future use and development where it should be condoned. In the other direction, a classification may be made that leaves unprotected a reach of stream that needs to be protected. In order to make my point let me illustrate my argument with an example drawn from the print out sheets I obtained from Ms. Heinrich:

EXAMPLE:

On the attached Xeroxed copy of Table 1, Protected Area Categories - Protected Area Designation by Stream Reach for the Clearwater River - NW Power Planning Council, October, 1987--Page 2, I have underlined in red the case I wish to

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the use of the term "reach" in the classification code for stream  
management to call Run Creek. I have been involved in  
engineering studies on this stream and know it well.

There is a problem in interpreting what reach is  
involved. The Table shows that FERC project No. 06524  
is in this reach and a length of 2.1 miles is involved. The  
project on Fly Creek acted on by FERC is actually upstream  
several miles above Long Meadow Creek. My contention here  
is that the compilers of the classification erred. The  
classification given in the table for the portion of reach  
is, "Ungranted". Yet, the action of the Idaho  
Department of Water Resources was to deny a water right for  
power development on that reach of the stream because it  
was not in the public interest. This action was based on an  
extensive hearing that presented the views of the U.S.  
Forest Service and many local residents. The finding was  
that the proposed hydropower project would interfere with  
the scenic beauty and the recreational use of the stream.  
FERC has also denied the license application on this  
project for similar reasons.

I have two contentions to make: (1) the classification  
is made with information that by its nature and detail  
cannot be generalized as simply as it has been and be the  
final basis for making a decision whether to protect or  
not. The classification may be useful for preliminary  
screening purposes. (2) Since the reason for denying the  
State water permit application and a FERC license on this  
stream was on a public interest value, it concerns me that  
the classification done by the compilers of the NWPPC  
Table was not appropriately done. My fear is that there  
was not enough input from State agency technical people  
that really should have been involved, namely: Idaho  
Department of Water Resource experts. I believe that  
the methodology for rating the factors is too heavily  
weighted in favor of fishery parameters. (I recognize  
that the change to the Council was and is to mitigate  
the past fishery losses due to hydropower development,  
so it is natural to give emphasis to the fish problem, but  
other factors also should be considered).

To summarize on this particular example and other  
entries which I have checked and about which I have personal  
knowledge; it appears errors were made and there may be  
deficiency in criteria and methodology for making the  
classification. I feel if the classification were done  
correctly, the reach should have carried some type of  
protection. Further, it appears that several other entries on  
the Table are in error, the copy I received did not have any  
indication of the footed river in Idaho, but had sets up  
that stream in Montana. I do question the accuracy of the data base.

Now, I would like to make my recommendations with regard to

action on the use and implementation of the protection classification:

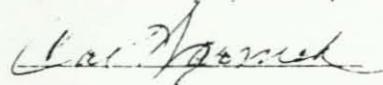
1. That the classification action and system be used only as a preliminary screening tool for state agency use, federal agency use and interested developers. Further, that additional study be made to test the criteria used in the classification system and the way factors are weighted. My suggestion is that this testing be done by independent experts, which I feel should include personnel from State water rights staff and FERC staff familiar with such problems.

2. That the Northwest Power Planning Council, being a regional planning entity restrict its activity to planning and leave the action of designating protected areas to agencies that have already been designated for that responsibility. In the State of Idaho our Idaho Department of Water Resources, in cooperation with the Idaho Department of Fish and Game and the Idaho Department of Parks and Recreation, has appropriated the waters of certain streams for protected status and instream beneficial use. In Idaho provision is made for the Idaho Legislature to deny or approve the decision. This may appear to be too slow and cumbersome to the Council, but there is an element of states rights involved that should be considered and legally appraised. My hunch is that legal action would be brought and it would be an expensive and time consuming exercise that might well be avoided if the Council considers the classification as only a preliminary screening and a planning effort.

On the point of State's rights I recognize by my past background as a former State employee I am biased, but I appeal to you, Mr. Goller that you likewise should take the State's side in such an argument. My concern is probably like yours that this experiment in regional government, a new and needed way to solve problems should get a chance to function. However, how far should it go? Because of the importance of this recommendation I am taking the liberty to send copies to those listed below.

Thanks for your consideration of my recommendations. If I can be of future help please call on me.

Sincerely yours,



C. C. Warrick P.E.

Governor Cecil Andrus

R. Keith Higginson, Director Idaho Department of Water Resources

Senator James McClure

Director Idaho Department of Fish and Game

Director

Idaho Department of Parks and Recreation

George W. Bloomsburg, Director

University of Idaho

Water Resources Research Institute

Kenneth Hingerford, Member

Idaho Water Resources Board