

Lower Snake River Channel Maintenance Immediate Need Dredging for
Commercial Navigation

Environmental Assessment

Comment Response Document

September 2022

Letter of support	Thank you for your comments.
Letter of support	Thank you for your comments.
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Technological issues prevented commenting	Thank you for your review of the documents.
Supports dam breaching	An alternative involving LSRP dam deauthorization, removal, or breaching is outside the reasonable range of alternatives required by NEPA for this action, given the stated purpose and need for both the PSMP (maintain the LSRP by developing a PSMP to manage sediment that interferes with existing authorized purposes of the LSRP) and the immediate need action [reestablish the navigation channel to congressionally-authorized dimensions (14 feet deep by 250 feet wide)].
Letter of support	Thank you for your comments.

An EIS should be conducted because it will allow the Corps and the public to consider more alternatives to the dredging project than a typical EA, including the alternative that we have proposed below.... We believe the US Army Corps of Engineers, Walla Walla District (Corps) should alter its Preferred Alternative to include the measure “reservoir drawdown to flush sediments” as described in the 2014 Programmatic Sediment Plan (PSMP) Environmental Impact Statement. Inclusion of this measure would minimize the likely adverse effects of the proposed project on Snake River anadromous fish, improve conditions for juvenile fish migration through the lower Snake River dams, and lower overall costs of the project. A full Environmental Impact Statement assessing the project, which we believe is necessary, would show the benefits of an altered approach....We believe the Corps should consider a drawdown and dredging alternative to the proposed approach. Such an alternative would result in greater benefits for juvenile fish, less adverse effects on adult fish, and lower costs.	The EA is tiered from the 2014 PSMP Final Environmental Impact Statement (FEIS), where alternatives were considered and it was determined that for immediate need sediment management actions, dredging was the only reasonable alternative. The drawdown option was considered in the PSMP FEIS. However, as part of the PSMP, the Corps has initiated a separate tiered future-forecast (long-term) NEPA analysis to assess other potential solutions for future sediment management.
We also believe the Corps’ Finding of No Significant Impact was evaluated without full context of the cumulative impact of the lower Snake River dam operations on salmon and steelhead, and should be reconsidered through an EIS.	The Corps consulted with the National Marine Fisheries Service on effects to salmon and steelhead, including cumulative effects. The National Marine Fisheries Service determined the proposed action is not likely to jeopardize the continued existence of salmon or steelhead, nor would it adversely modify their designated critical habitat.

As part of the draft EA, the Corps did not reconsider the current value of navigation through the LSRP in its determination of whether ongoing/anticipated commercial use of the LSR navigation channel warrants continued maintenance... This base consideration of whether maintenance is warranted is a fundamental issue for the proposed project. Before moving forward, the Corps must reassess the current amount of traffic and the increased cost of transporting goods by other means.	The scope of the Corps action is maintenance of safe navigation through the existing system. The action is warranted to ensure safe and efficient navigation and to improve conditions for protected species.
The EA also makes mention of “a study under the PSMP on a long-term solution to managing problem sediment accumulation at the Snake and Clearwater River confluence that has been initiated.” The Corps should complete this study and use it to estimate annual costs of channel maintenance for use in this cost-benefit analysis.	The Corps future forecast, long-term NEPA analysis on potential long-term solutions for navigation channel maintenance is currently underway. However, some level of dredging in the future is likely to remain as a necessary component of any longer term solution.

We ask the Corps to justify the project in economic terms in the final EA or EIS process.	A detailed economic analysis, which includes the identification of National Economic Development benefits, is required when developing a recommendation to Congress on whether a new navigation project is feasible and should be constructed. Once a navigation project is authorized and constructed, however, the Corps ensures continued maintenance is economically warranted based on continued commercial use of the navigation system. The Corps is not required to prepare a detailed economics analysis of the type called for in many public comments. Economic studies like those included in feasibility studies are not necessary when evaluating maintenance alternatives for existing projects. The focus for cost-analysis under NEPA is on comparison of alternatives, not justification of the proposed project. Cost analysis is required when alternatives are (or should be) compared on a cost basis. Cost analysis is not required when there are more important qualitative considerations for comparing alternatives. 40 C.F.R. 1502.23 states: "If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating environmental consequences. . . . For purposes of complying with the Act [section 102 (42 USC § 4332)], the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations." To ensure that continued maintenance contemplated in the alternatives is warranted, the Corps relies on ER 1105-2-100 E-15h(3)(a)(1), <i>Review of Continuing Economic Justification</i>, when evaluating alternatives in these scenarios. It states that "continuation of ongoing dredged material management studies is conditioned on a confirmation that continued maintenance is
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	warranted. Therefore, for each ongoing study, a review of indicators of continued economic justification will be conducted.” When the project is being used for commercial navigation by vessels requiring the congressionally-authorized depth for safe navigation, the Corps seeks to maintain the project to its authorized dimensions using the least costly manner consistent with sound engineering practices and meeting the environmental standards established by the Clean Water Act 404 (b) (1) evaluation process (33 CFR 336.1(c)(1)). The PSMP was developed to help identify and consider cost effective and environmentally acceptable methods to meet the authorized project purposes, including navigation. For the PSMP and the first channel maintenance action consistent therewith, the Corps considered previous detailed economic analyses including the Final Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement (LSRJSMFR) from February 2002 (http://www.nww.usace.army.mil/Library/2002LSRStudy.aspx), the Draft Dredged Material Management Plan (DMMP) from 2001, and the current level of commercial navigation on the Snake River system. The DMMP identified a benefit-to-cost ratio of approximately 10:1 for maintenance of the lower Snake River navigation channel. The LSRJSMFR evaluated structural modifications and alternatives to the LSRP, including dam breaching. At that time, annual costs to commercial transportation were estimated at approximately \$38M if the LSRP was removed and the navigation channel became unavailable (from Executive Summary). Finally, Congress continues to support maintenance of the authorized channel. Congress has funded multiple channel maintenance (dredging) actions for the LSRP since the 1980s, including the most recent in the winter of 2005/2006 – all to the authorized 14-foot depth (16 feet with authorized over-depth).
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	Given the continued level of commercial use of the navigation system identified in the EIS and associated benefits the Corps has included a request in its fiscal year 2014 budget for funding to reestablish the LSRP navigation channel. Ultimately, Congress will decide if ongoing navigation maintenance actions for the LSRP are justified and a budget priority Section 3.5.3.1 of the EIS has been modified to include additional economic information and clarify economic justification for ongoing channel maintenance. Computing costs of measures identified in the PSMP (Appendix A to the EIS) that could be implemented in the future to address sediment interfering with existing authorized purposes of the LSRP (e.g., in-water structures) is outside the scope of the proposed actions under this EIS. The implementation of such measures in the future (if warranted) would undergo tier-off NEPA analysis.
The draft EA incorrectly characterizes the importance of the Columbia-Snake River system for the export of wheat.	The commenter does not provide a resource for different information. We conclude our information is the best available as drawn from the PSMP FEIS.
We are also concerned that the Corps' Finding of No Significant Impact (FONSI) for the project is improper because of the cumulative effects of channel maintenance in the context of continued operation of the lower Snake River dams. As a result, we believe that alternative measures for sediment removal should be considered through an Environmental Impact Statement (EIS).	Alternative methods to dredging for immediate needs were evaluated in the 2014 PSMP FEIS. Periodic dredging was identified as necessary when certain sedimentation triggers were met. Accumulated sediment has become problematic in the areas proposed for immediate need dredging. The Corps prepared an EA to evaluate potential impacts from the proposed action for significance. No significant impacts were identified.

The Corps should prepare a new and updated Environmental Impact Statement (EIS) on the proposed project because this project, in the context of continued operation of the lower Snake River dams, may result in significant environmental impacts on fish health, while socioeconomic conditions and the navigational benefits of the LSR waterway have changed since 2014.	The Corps consulted with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service on potential impacts to ESA-listed fish species. Both Services concluded the proposed action is not likely to jeopardize the existence of any ESA-listed species or adversely modify or destroy designated critical habitat.
Dredging of the lower Snake River navigation channel is part of this suite of actions that has placed Snake River anadromous fish at high risk of extinction. Taken in context, the cumulative impacts to salmon and steelhead are significant, and each piece of that context should be evaluated rigorously via an EIS, with all alternatives analyzed to reduce this cumulative, significant impact as much as possible. We believe the Corps should reconsider its issuance of a FONSI for this project, and identify an alternative method of sediment removal that reduces the impact to anadromous fish.	The Corps consulted with the National Marine Fisheries Service on potential impacts to ESA-listed salmon and steelhead. They concluded the proposed action is not likely to jeopardize the existence of any ESA-listed species or adversely modify or destroy designated critical habitat.
The proposed project does not align with the changing political and legal context around the Lower Snake River dams.	The Corps is following established and required federal impact assessment and decision making processes in addressing the immediate need to support Congressionally authorized project purposes.

The framing of the purpose and need statement of the FEIS – requiring a 14-foot channel immediately and indefinitely – renders the outcome of that report a foregone conclusion because the answer to this narrow framing will always be dredging. Similarly, all reasonable alternatives were not fully considered by the Corps in the PSMP and were dismissed because they would not result in the immediate establishment of a 14-foot navigation channel. This logic is flawed for two reasons. One, the authorized project purposes include, “...hydropower generation, inland navigation, recreation, fish and wildlife, and incidental irrigation”¹ The navigation component of the system does not exist to provide a dredged channel as the Corps’ framing would make it seem. A dredged channel, with congressionally authorized dimensions, is merely one method to facilitate the purpose of inland navigation. Second, inland navigation has not been exalted above the other project purposes by Congress, such that an uncompromising stance on dredging to a 14-foot channel can be justified.	Congressional authorization of the Lower Snake River Projects included the operation and maintenance of a 14 foot deep by 250 foot wide channel.
This EA is a continuation of the narrow framing found in the FEIS, allowing for it and future dredging actions along the LSRPs to consider only dredged material disposal alternatives and not alternatives to dredging in the first place. The EA should take the opportunity for a fresh look at the alternatives examined in the FEIS, as well as the LSRP system as a whole, which prioritizes navigation at the expense of other authorized purposes	The Corps is following its commitments made in the PSMP and associated FEIS. This EA is tiered from the FEIS. The long-term solution NEPA study will assess potential alternatives to dredging for sediment management of the navigation channel in accordance with the PSMP.

such as fish and wildlife. The Snake River system as a whole is established for many purposes, with navigation as one component and a 14-foot channel as one option in the menu of possibilities to serve navigation.	
There are many ways to transport products that do not require the entire channel and that would retain the non-barging economic benefits port facilities provide. The LSRPs are economically and environmentally costly and have been the primary driver for declines in Endangered Species Act (ESA) – listed Snake River salmonid populations. The four Lower Snake River dams, as a component of the Federal Columbia River Power System (FCRPS) have drastically impacted native salmonids and continue to remain the impediment to populations being removed from the ESA-list or recovering to healthy and harvestable abundance.	The Corps consulted with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service. These agencies concluded that the proposed action is not likely to jeopardize the continued existence of any ESA-listed species.
This EA does not consider the Proposed Action dredging in the larger context of the LSRP's remaining an impediment to recovery or the continued viability of Snake River salmonid populations. The impacts of the proposed dredging and disposal itself to Pacific lamprey, a culturally significant resource to local tribes, are not evaluated thoroughly enough as well.	The Corps has fully considered impacts to ESA protected species in the EA and in the Corps consultations under the Endangered Species Act. The Corps has also considered potential effects to important species such as lamprey and has included surveys for lamprey based upon scoping comments received.

The Proposed Action would have significant impacts to ESA-listed Snake River salmonids and bull trout	The Corps consulted with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service. These agencies concluded that the proposed action is not likely to jeopardize the continued existence of any ESA-listed species.
The Proposed Action would have significant impacts to Pacific lamprey	There are very few lamprey in the proposed work areas. However, the Corps intends to survey for juvenile lamprey to verify this is still true after recent translocation efforts. The Corps does not believe there would be significant effects on Pacific lamprey from the proposed dredging.
The Corps should evaluate climate change as an Environmental Component under the "Affected Environment and Environmental Consequences" section of the EA	The Corps studied the potential effects from and to climate change in the PSMP FEIS. The Corps further considered climate change in the EA for the proposed action and determined that "Climate change would not impact the proposed action nor would the proposed action impact climate change."
Various sediment management actions will have impacts on natural resources, including fisheries, some of which are listed for protection under the Endangered Species Act. The current practice of operating the water level above Minimum Operating Pool (MOP) also has impacts to these same listed species.	The Corps consulted with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service. These agencies concluded that the proposed action is not likely to jeopardize the continued existence of any ESA-listed species.
In past correspondence, IDFG has expressed the need to address long-term operational impacts and sediment accumulation in the reservoir. The PSMP is supposed to be that long-term approach to manage and prevent sediment from accumulating in Lower Granite reservoir.	The Corps study on potential longer-term solutions for navigation channel maintenance is currently getting underway. While there may be actions that could reduce sediment, there is likely nothing that will prevent sediment from accumulating in Lower Granite Reservoir. Some level of dredging in the future is likely to remain as a necessary component of any longer term solution.

The LSR EA is using the future immediate needs trigger list above as its justification for immediate treatment. However, the last dredging (2015) life was extended beyond the five-year trigger timeframe listed in future forecasted needs trigger listed above by operating the Lower Granite Reservoir under Variable MOP operations since April 2018. This means the last dredging effort only met need for 3 years. Lower Granite Reservoir is supposed to be operated within 1.5 foot of MOP from April through August for ESA listed threatened and endangered juvenile salmon and steelhead passage as called for in CRSO EIS ROD 2020. Further, it is reasonable to believe that without any of the sediment reducing measures having been implemented, the only way the current proposed dredging will meet the forecasted 5-year plus time frame is if the Lower Granite Reservoir is held at water levels above those outlined in the 2020 CRSO EIS ROD.	The Lower Granite Reservoir has been operated within its designed operation range. Operations above MOP have been coordinated with the National Marine Fisheries Service. The dredging action is intended to support returning to MOP to ensure safe navigation and for the benefit of ESA-protected fish.
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The proposed action in the LSR EA states: "a study under the PSMP on a long-term solution to managing problem sediment accumulation at the Snake and Clearwater River confluence has been initiated and is progressing as funding becomes available". However, in the LSR EA cumulative effects analysis, the future foreseeable actions do not include any evaluation or application of the non-dredging sediment measures that are part of Alternative 7 listed in the PSMP. So it is unclear if the COE consider the "future forecasted needs" triggers as having been met. This should be explicitly stated in LSR EA. The COE has only been able to exceed the 5- year trigger time frame by operating the Lower Granite reservoir using Variable MOP operations from April through August impacting survival of ESA listed juvenile fish. Idaho Department of Fish and Game (IDFG) encourages the COE to begin the analysis and implementation process of the non-dredging sediment prevention and mitigations measures outlined in Alternative 7 of PSMP. Additionally, IDFG would request that the COE increase the dredging cycle to less than the current 5-plus years so the Lower Granite Reservoir can be managed within the 1.5 foot MOP range of 733 - 734.5 ft and still allow navigation. This increased dredging frequency should be maintained until additional measures to reduce sediment accumulation are implemented.	The future forecast, long-term NEPA analysis tiered from the PSMP FEIS to assess other sediment management options has been initiated. That analysis of future potential solutions is outside of the scope of the immediate need action. The Corps requests funding for channel maintenance on an as-needed basis and seeks to operate within 1.5 foot of MOP.
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The next issue that IDFG would like the COE address in the action associated with LSR EA action is to address sediment impacting the boat ramps in the Lower Granite Reservoir. The purpose and need in the PSMP includes "Recreation by limiting water depth at recreation areas to less than original design dimensions and thereby impairing access". As stated in our scoping correspondence, the Greenbelt boat ramp in Clarkston is barely useable now, and when Lower Granite Reservoir is returned to MOP, this facility will likely become unusable. Other boat ramps will likely be impacted as well and may become unusable in the near future. None of these facilities have been dredged since 1997/98. The IDFG encourages the COE to survey these boat ramps and treat any of them that would become unusable by typical boat traffic at MOP. If the COE selects dredging instead of agitation, treatment should occur this winter without re-consulting which will save time and money.	The Corps has initiated an additional NEPA study tiered from the PSMP FEIS to address recreational boat basin and ramp sediment management as a separate effort to support recreation needs. It is probable that sediment sampling and analysis will occur sometime during 2023 and when funding is made available, the NEPA process will continue. Dredging the recreation basins and boat ramps is outside of the current immediate need commercial navigation channel maintenance scope.
The IDFG would like the COE to begin analysis as outlined in the PSMP Alternative 7, acknowledging that a chronic sediment problem exists in the Lower Granite reservoir.	The future forecast, long-term NEPA analysis tiered from the PSMP FEIS to assess other sediment management options has been initiated.
We would encourage the COE to institute an increased dredging frequency in the Lower Granite Reservoir which would allow it to continually be held within 1.5 foot of MOP while providing navigation needs and expediting juvenile fish migration.	Thank you for your recommendation, increasing the dredging frequency has several other consequences that would need to be considered. Funding is not available every year. Also, the current programmatic ESA consultation is based on dredging in not less than 5 year increments.

We would encourage the COE to maintain the boat ramps influenced by sedimentation to provide for the existing high levels recreation that occurs in and around the Lower Granite Reservoir.	Recreation areas must be dredged with a different funding source.
Letter of support	Thank you for your comments.
Dredge launch behind Costco	Recreation areas must be dredged with a different funding source that is not currently available.
This comment appears to be based on the Lewiston Tribune article, not the EA.	Salmon and steelhead do not spawn near Bishop Bar. The commentor also appears to have caught fish in 15 feet of water. The water depth within the disposal area is currently 60 to 80 feet deep and would be about 20 feet deep after the proposed project is completed.
A solution that restores the Lower Snake River and invests in transportation infrastructure will eliminate the Corps' present dilemma of being unable to honor Treaty and trust obligations to the Nez Perce Tribe.	This comment is outside the scope of the proposed immediate need dredging-disposal action, the associated Environmental Assessment (EA) and the Programmatic Sediment Management Plan (PSMP). The Corps honors its trust responsibilities and any treaty obligations to the Nez Perce Tribe.
[T]he fish protection measure of operating at minimum operating pool ("MOP") has been established to enable faster fish travel times for out-migrating ESA-listed fish. Yet, presently when faced with the recurring sedimentation in Lower Granite Reservoir, the Corps has chosen not to operate at MOP but to raise the pool level above MOP elevation to allow for barging rather than adjusting loading of barges to accommodate the needs of the fish. The Tribe questions why the ESA-listed fish must bear the burden of the Corps' prioritization of navigation over obligations to listed fish and the safest migratory passage of fish. The Corps asserts that the proposed dredging will provide for returning to MOP operations.	The Corps desires to operate at MOP as outlined in the 2020 NOAA Columbia River System Biological Opinion (NOAA BiOp), and numerous operational and structural changes have been made to the Columbia River System to benefit ESA-listed fish and associated critical habitat (e.g., spring spill operations). Operation of the Lower Granite pool above MOP, however, is authorized under the NOAA BiOp, as described in the Proposed Federal Action, when necessary to meet authorized project purposes, primarily navigation (See Section 1.3.1.2.4 [Reservoir Operations]). Congress established the lower Snake River navigation channel in the Flood Control Act of 1962 at 250 feet wide and 14 Feet deep, at MOP. The commercial navigation industry has developed its barges and vessels to operate at those dimensions. Adjusting the Lower Granite Reservoir elevation to account for sedimentation is consistent with the Corps navigation mission and the intent of Congress. The Corps lacks authority to adjust or require "light-loading" of commercial

	vessels -- a decision which must ultimately be made by vessel captains/operators based on river conditions.
While operating at MOP will be beneficial, that action does not substitute for the biological needs of the fish and Nez Perce people that would be provided by a free-flowing Lower Snake River migration corridor.	This comment is outside the scope of the EA and the Programmatic Sediment Management Plan (PSMP).
Ensure pre-dredge surveys for juvenile and/or larval lamprey (Section 2.2. 7 .2) presence and relative abundance are conducted using U.S. Fish and Wildlife deep water electrofishing or equivalent methods that provide robust estimates of abundance and distribution.	The same deep water electrofishing method by PNNL used in 2011 would be used for the current larval lamprey survey, as the U.S. Fish and Wildlife Service is not available to do the work. The Corps chose to use the PNNL method as an alternate proven method that includes electrofishing combined with underwater video so that the presence of freshwater mussels could also be studied.
Request government-to-government consultation with the Tribe to review pre-dredge survey results and discuss mitigation actions.	The Corps Tribal Liaison will contact Nez Perce Tribe staff to set up a Government-to-Government meeting.
Expand real-time monitoring of dredge materials (Section 2.2.6.2) to include juvenile and/or larval lamprey, and include notification of the Nez Perce Tribe if lamprey are observed.	Due to the large volume of sediment to be dredged, the use of bottom dump barges, and the small size of juvenile lamprey, real-time monitoring for juvenile lamprey in the dredged material is not practical or safe and is unlikely to produce useful results.
Expand Impact Minimization Measures (Section 2.2.9) to include lamprey pre-dredge sampling.	Pre-dredging sampling would inform the Corps on the relative abundance of juvenile lamprey in the area, but would not minimize impacts. Information

	gathered would only help inform future impact assessments.
Expand Best Management Practices (Section 2.2.10) to include lamprey monitoring and notification of the Nez Perce Tribe.	Again, real-time monitoring for juvenile lamprey in the dredged material is not practical or safe and is unlikely to produce useful results. The Corps intends to conduct pre-dredging juvenile lamprey survey and notify the Nez Perce Tribe of the results.
Verify response plan is in place if observations of juvenile and/or larval lamprey in dredge materials exceed expectations.	The Corps does not expect to find juvenile lamprey in appreciable numbers. However, if juvenile lamprey are found, the Nez Perce Tribe would be notified, and Government-to-Government consultation would be offered to discuss an appropriate response to the findings.
Expand Appendix A Monitoring Plan to include Pacific lamprey monitoring.	During preparation of the EA and the appendices, the Corps did not have enough information to present the surveying method that would be used to survey for juvenile lamprey. The contracting process for this survey is now well underway. The monitoring plan will be updated.
Ensure disposal sites maintain at least 20-foot depth below MOP after disposal (Section 2.2.5).	The current plan is for the disposal site to remain at 20-feet below MOP.
Request dredge material disposal occurs in locations that would be above the annual high water mark (outside restored river channel) under breached Lower Granite Dam conditions (i.e., limit dredge material dumping to reservoir areas less than 60 feet in depth).	The disposal location/method identified is based on a number of factors, including the Corps Federal Standard and scientific analysis contained in our Clean Water Act Section 404(b)(1) Evaluation (written per EPA Guidelines), and arrival at a LEDPA (least environmentally damaging practicable alternative) and does not assume future Congressional action to authorize and fund breaching of the lower Snake River dams.
Question transporting sediment materials from below Ice Harbor upstream to the Lower Granite Pool. Likely not a functional risk or significant cost due to limited material (one barge load) and coble nature of the material being moved, but troublesome precedent.	Using one disposal area eliminates the need to identify a second disposal location for disposal of just one barge load of material.
Request prohibition of further Lower Granite Pool dredging prior to completion of a long-term solution per the PSMP. Restricting dredging event	The PSMP acknowledges that interim dredging-disposal may be required to address sedimentation prior to completing a future forecast tiered NEPA analysis of a long-term sediment management

frequency to periods no shorter than five years would reduce impacts on Pacific lamprey.	solution for the lower Snake River for navigation purposes. The Corps cannot predetermine the outcome of the tiered NEPA analysis for a long-term solution, including whether a dredging frequency period will be necessary.
Section 3.6.1.2, "Environmental Justice Communities," does not recognize that Indian tribes are an included category of required Environmental Justice consideration. Nor does the EA there or elsewhere provide a consideration of Environmental Justice effects on the Nez Perce Tribe - as an Environmental Justice protected class - within the action area. (See Council on Environmental Quality, Environmental Justice Guidance Under the National Environmental Policy Act (Dec. 10, 1997), https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_cegl297.pdf , for inclusion of "Indian tribes" within required Environmental Justice protected populations.)	The proposed action involves only dredging and associated disposal for sediment interfering with safe and efficient commercial navigation. The Corps acknowledges that the Nez Perce Tribe is an appropriate population to consider under environmental justice impact assessments. The Corps did not identify environmental justice concerns based on that limited proposed action and potential effects. The Corps did incorporate recommendations provided by the Nez Perce Tribe during project scoping to monitor for lamprey.
Section 5.1, "Treaties," neither adequately recognizes the need to consider environmental effects on Indian treaty rights and resources nor does it adequately consider such effects. It is well established in multiple federal agency National Environmental Policy Act ("NEPA") guidelines that Indian treaty rights and resources are a required environmental effect consideration. As a reminder of that needed consideration, the D.C. District Court opinion in the case of Standing Rock Sioux Tribe v. U.S. Army Corps of Engineers provided a reminder that consideration of federal action	The Corps acknowledges that treaty rights and resources should generally be considered under NEPA if a proposed action may have more than minimal effects on such rights and/or resources. The proposed action involves limited dredging and disposal activities and is not expected to violate treaty rights or obligations nor notably affect treaty resources.

impacts on Indian tribal treaty rights is an agency "obligation" under NEPA. (Mar. 25, 2020, Mem. Op. at 7, citing Standing Rock III, 255 F. Supp. 3d 101, 132-34 (D.D.C. 2017).	
When will this project be out for bid?	This project went out for bid in July 2022.
Why transport the material so far downstream?	As stated in the EA, the material has to be placed downstream of river mile 120 so that it does not induce flooding. Bishop Bar contains desirable characteristics or relatively deep water in a low velocity area for use as a disposal site.
Letter of support	Thank you for your comments.
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Letter of support	Thank you for your comments.
My overall comment is neither the EA nor the Section 404(b)(1) evaluation provides sufficient information about or analysis of the proposed dredged material disposal action to disclose to the public how and why the Walla Walla District Corps of Engineers (Corps) plans to dispose of the dredged material in-water at Bishop Bar, River Mile 118. The Section 404(b)(1) evaluation does not provide an adequate explanation of how this proposed disposal meets the requirements of the Section 404(b)(1) guidelines (i.e. show why this in-water disposal is the least environmentally damaging practicable alternative).	The Corps reviewed your comments in total to determine specific concerns regarding adequacy. In general, the Corps does not repeat detailed analysis in the EA or 404(b)(1) evaluation provided by the PSMP EIS as this effort incorporates the PSMP and tiers from it per NEPA regulations. Repeating the source material does not enhance technical adequacy and is counter to NEPA's objective of clear and concise writing. However, revisions and additional information have been added to the 404(b)(1), and to a lesser extent, the EA and FONSI, to better clarify that Bishop Bar is the least environmentally damaging practicable alternative for the proposed in-water disposal of dredged material.

EA 1. Cover – The cover page of the EA lists six counties in Washington and one county in Idaho, apparently as a way of identifying the counties in which the proposed action would take place. However, the dredging at Ice Harbor Dam would take place in Franklin County, dredging at the Snake/Clearwater confluence would take place in Asotin and Whitman counties in Washington and Nez Perce County in Idaho, and the disposal would take place in Whitman County, but no part of the proposed action would take place in Columbia, Garfield, or Walla Walla counties in Washington. If this list on the cover is meant to address counties in which the proposed action would take place, these three counties should be deleted.	The comment is noted. Project dredges will travel through listed counties while under contract and therefore are appropriately noted within the scope, although we acknowledge that dredging work will not occur in all counties listed.
EA 2. Section 1.1.1 Proposed Action, first paragraph – This paragraph states the dredging would take place during the in-water work window of December 15 through March 1, but does not state what year. The EA doesn't identify the year until Section 2.2 in the description of Alternative 2. The text in the Introduction section should be revised to inform the public what year the Corps is proposing to perform this action.	Text changed as follows: "The Corps is proposing to accomplish the dredging and disposal action during the next winter in-water work window of December 15, 2022 to March 1, 2023, or during the next available in-water work window, subject to any delays and available funding/resources."
EA 3. Section 1.1.1 Proposed Action, first paragraph – This paragraph states the berthing areas at the Port of Clarkston and Port of Lewiston would be dredged, but doesn't say by whom. If the Corps plans to do this dredging using its dredging contractor, the EA should clearly state the Corps would perform the dredging and the	The comment is noted. The affected Ports fund the efforts to dredge their respective berthing areas. Providing added details does not alter the effects of the action, however the EA has been clarified to note fiscal responsibilities.

dredging would be funded by the Ports.	
EA 4. Section 1.1.1 Proposed Action, second paragraph – The EA should identify 33 CFR 230 as the Corps of Engineers regulations for complying with NEPA.	The paragraph references the applicable NEPA regulations in 33 CFR 230.
EA 5. Section 1.1.1 Proposed Action, third paragraph – The EA should revise the first sentence to use the full title of the 2014 PSMP FEIS and identify the FEIS as a Corps document: “This EA is tiered from the Corps of Engineers August 2014 Lower Snake River Programmatic Sediment Management Plan (PSMP), Final Environmental Impact Statement (FEIS)...”	The paragraph has been edited for clarity.
EA 6. Section 1.1.1 Proposed Action, third paragraph – Suggest revising this paragraph to better explain how the EA is related to the PSMP. Explain that the Corps has hit the trigger in the Plan for a future forecast need for navigation at the Snake/Clearwater confluence and has initiated a study for a long-term solution to the sediment accumulation at this location. Explain the Corps has also hit the trigger in the Plan for an immediate need action to address accumulated sediment that is currently interfering with navigation at the confluence. State that as provided for in the Plan, the Corps proposes to perform an immediate need dredging action while the long-term solution is being studied.	Edits have been made for clarity regarding trigger for immediate need.

EA 7. Section 1.1.2 Authority – Because this is EA is tiered from the PSMP FEIS, it only needs to focus on the site-specific action, navigation maintenance, and the authority for that action. There is no need to list all of the authorized project purposes of the lower Snake River dams or the discuss the authorities for each of those purposes. The PSMP FEIS addressed other authorities because it had to address all of the authorized project purposes with which sediment accumulation interferes. This tier-off EA is only addressing one authorized project purpose – navigation. The information about the other authorities can be deleted as it is not relevant to the proposed action.	Comment is noted. Describing the full authorized project purposes is valuable for the lay reader to understand the full function of the facilities. Focusing on navigation alone fails to provide context regarding the total benefits provided by Corps facilities to the public.
EA 8. Section 1.1.2 Authority: fifth paragraph: Verify that Section 109 of WRDA 1992 applies to this currently proposed access channel and berthing area dredging for the Ports of Lewiston and Clarkston. For several previous Corps dredging actions that included the Ports of Lewiston and Clarkston, the Corps determined the WRDA 1992 authority was a one-time authority that only applied to dredging needed to address the adverse effects of the 1992 Snake River drawdown test on Port access (Lower Granite and Little Goose reservoirs were drawn down for several weeks in the early spring to test drawdown as a possible option to improve migration conditions for juvenile salmonids). The Corps determined the authority did not apply to routine maintenance dredging of Port access or berthing areas.	Comment is noted. The Corps confirms the applicability of the stated authorization.

EA 9. Section 1.1.3 Purpose and Need, first paragraph – The information about overdredging and advanced maintenance should be moved to the description of the proposed action and deleted from this section as the information is not part of the purpose of or need for the proposed action.	Comment is noted. The Corps finds the information regarding the need to dredge to a depth of 16 feet useful context for the public and Corps decision makers in the purpose and need section.
EA 10. Section 1.1.3 Purpose and Need, first paragraph – The text should be revised to clarify that the federal standard refers to the dredged material disposal. As written, the EA appears to say that both the dredging and the dredged material disposal have to meet the federal standard. It is also not clear why this statement is included in the Purpose and Need section as it is not defined as part of the purpose or identified as a reason the dredging is needed.	The second paragraph of Section 1.1.3 clarifies that the federal standard applies only to disposal. The first paragraph also clearly states “The proposed action is needed to restore safe and effective navigation in the federal channel through the lower Snake River to Lewiston, Idaho because accumulated sediment (which results in shallower water) is impeding navigation”, which provides a clear reason why dredging is needed.
EA 11. Section 1.1.3 Purpose and Need, first paragraph – The text should be revised to include statements about the shoaling in the downstream navigation lock approach at Ice Harbor Dam. Dredging the lock approach is part of the proposed action, yet the purpose section only focuses on the Snake/Clearwater confluence and the berthing areas for the Ports of Lewiston and Clarkston. Maintaining the authorized dimensions of the federal channel at Ice Harbor is very important as all commercial vessels must go through the lock at Ice Harbor to enter or exit the Snake River navigation system.	Clarifying language has been added to describe the Ice Harbor Dam approach shoaling.

EA 12. Section 1.2 Project Location – This section should be a description of the location of the proposed work, not a general description of the four lower Snake River dams. While it was appropriate for the PSMP FEIS to address all four dams, this EA is addressing a site-specific action under the PSMP and should focus on the locations where the work would take place and not the entire four-dam system. Recommend deleting the information about the dams that are not part of the proposed action.	The lower Snake River dams operate as a system and therefore providing the system context is beneficial to the lay reader and decision makers. However, the Corps has emphasized the Ice Harbor and Lower Granite dams for clarity.
EA 13. Figure 1-1. The label for this figure uses the term “Study Area”, but this EA is addressing a proposed maintenance action, not a study. Suggest revising the label to “Project Location” or something similar.	The caption has been changed to: "The Lower Snake River Dams."
EA 14. Section 1.3 Commercial Navigation and Minimum Operating Pool (MOP) – It is not clear what information this paragraph is trying to convey. It appears to be a series of unrelated statements with no explanation of how this information is relevant to the proposed action. It mixes information about the operating range of the reservoirs with information about ranges of MOP operation, but does not explain why the reader needs to know about either range. It also appears to be trying to address all four reservoirs in some statements, but in the last sentence it is addressing only one reservoir, without identifying which one. This section should be revised so it clearly conveys meaningful information to the reader.	The referenced section provides a succinct description of when project operations and salmonids are affected when deviating from MOP. It shows the trade-off required to maintain safe navigation capability at the cost of salmonid benefits as useful context for the public and decision makers.

EA 15. Section 1.4 Sediment Management History – Most of this section is irrelevant to the proposed action and should be deleted from this EA. This history was appropriate for the PSMP FEIS as the scope of that document was to develop a sediment management plan for the lower Snake River dam system. However, this EA is addressing a site-specific action under the PSMP and a history of lower Snake River sediment management (dredging) is not needed. Table 1-2 should be deleted and replaced with a brief history of how the Corps has managed sediment (i.e. dredging) at the sites included in the proposed action. Most of this section is not even a history of sediment management. Instead, it is a description of commercial navigation on the Columbia and Snake Rivers. Some of it might be appropriate for the description of the Affected Environment for Socioeconomics later in this EA, but it does not belong under Sediment Management History. The last paragraph does not appear to be related to the proposed action and should be deleted.	Section title changed to "Channel Maintenance History". However, the section provides important context regarding the values provided by the system driving the need for sediment management, and a useful history of sediment management actions taken over time for the public and decision makers. Last paragraph deleted.
EA 16. Section 2 Formulation of Alternatives – The title of this section is misleading. The first part of the section does discuss how the Corps developed the alternatives, but the section also includes descriptions of the alternatives. Suggest changing the title of the section to “Alternatives’, then putting the alternatives formulation in the first subsection.	Comment noted. The description of how alternatives are developed flows directly into a description of the alternatives developed. Changes in heading do not appear to add clarity.

EA 17. Section 2 Formulation of Alternatives, Evaluation of Disposal Options – The first sentence is incorrect as it makes the non-sensical statement that dredging is an alternative to sediment removal. Revise the first sentence to say “Because the PSMP FEIS identifies dredging as the only feasible measure to manage sediment that has already deposited and is interfering with navigation, ... “	Comment is noted. The sentence referenced is in clear language: "As the PSMP FEIS identifies dredging as the only feasible alternative to sediment removal for immediate need conditions, the Corps focused on sediment disposal options to combine with dredging to form complete alternatives."
The last paragraph states that Alternative 2 in this EA is very similar to Alternative 7 in the PSMP FEIS. Suggest deleting this statement as this does not acknowledge the relationship between the PSMP FEIS and this EA. The PSMP evaluated different programmatic approaches to managing sediment accumulation that interfered with authorized project purposes of the dams and developed a Plan based on the preferred alternative. This EA is evaluating a site-specific action the Corps is proposing to take under that Plan. The alternatives for the two documents have different scopes and purposes.	Comment is noted, but the Corps disagrees. The PSMP FEIS is fully acknowledged and included the previous immediate need action with a similar scope as called out.
EA 18. Section 2.1 Alternative 1: No Action – In the second paragraph the EA mentions adjusting reservoir operation for Lower Granite, but does not mention adjusting McNary and/or Ice Harbor reservoir operations to provide sufficient water depth in the Ice Harbor downstream navigation lock approach. Suggest revising the text to include this operation adjustment for the Ice Harbor location. (See Navigation Objective Reservoir Operation in Section 2.2.4.3 of the PSMP FEIS.)	Comment noted. The Corps does not adjust McNary and Ice Harbor reservoir operations to provide sufficient water depth in the Ice Harbor navigation lock approach.

EA 19. Section 2.2 Alternative 2: Immediate Need Dredging, third paragraph – Suggest adding an explanation of why the federal navigation channel footprint has been decreased from the footprint that has been used for at least the last 25 years. Also explain why no expansion of the channel for turning basins is being provided for the Port of Clarkston berthing areas, but is still being maintained for the Port of Lewiston berthing area (see figure 2-2). This appears to be showing favoritism to the Port of Lewiston by providing their users with a turning basin, but not those using the Port of Clarkston.	The Corps acknowledges the decision to pursue a smaller footprint than previously employed for maintenance dredging. However, the reason is not useful to understanding the impacts associated with the proposed action, nor the context of dredging.
EA 20. Section 2.2.1.1 Snake/Clearwater Confluence in Lower Granite Reservoir, second paragraph. The first sentence reads as if the federal channel moves around, but is currently in front of the Lewiston grain terminal dock. Suggest revising the text to better explain what point the Corps is trying to make.	The text has been revised as follows: "The federal navigation channel has a maximum total width of 450 feet in front of the Lewiston grain terminal dock. This wider area allows for maneuvering of barge tows at the terminus of the navigation system in accordance with 33 U.S.C. § 562, "Channel dimensions specified shall be understood to admit of such increase at the entrances, bends, sidings, and turning places as may be necessary to allow for the free movement of boats.""
EA 21. Figure 2-3. It is not clear what this figure is showing. The label says the edges of shallow areas are in green, but it is not clear what the extent is of the shallow areas. Suggest revising the figure to shade the entire area of shallow water, not just edges.	The Corps agrees the figure could be clearer in illustrating the shallow areas to be dredged, but the associated paragraphs clearly explain the function and meaning.
EA 22. Section 2.2.2 Sediment Removal Methods – Suggest changing this title to "Dredging Methods". The PSMP and this EA have already determined that dredging is the only sediment management measure to be used for an immediate need action for navigation. This would also fit better	Heading changed to "Dredging Methods".

with the text, which only discusses dredging.	
EA 23. Section 2.2.3 Sediment Disposal Location – The heading for this section should be changed to “Sediment Disposal” and the text should be revised to include more description of the Bishop Bar site, why it was selected for placement of the dredged material, and details on how the dredged material would be placed at the site.	Comment noted. Heading changed to "Sediment Disposal". The 404(b)(1) Evaluation (Appendix B) provides detailed description of the Bishop Bar location and why it was selected. This section is a summary for the reader only.
First paragraph – The opening sentence of this paragraph state that the purpose of this section is to describe the location for dredged material disposal for the proposed action, yet most of the section does not describe the location. Instead, the section is a string of what appears to be unrelated paragraphs. This text should be revised to tell a cohesive story.	First sentence deleted. Second and third paragraphs deleted as deemed un-necessary. The first and fourth paragraphs are introductory and provide background information so have been retained. The background information is adequate for reader understanding.

Second paragraph – it is not clear what information this paragraph is trying to provide or how it relates to the proposed action. It seems to indicate that Appendix L of the PSMP evaluated long- term sediment management disposal options and concluded upland disposal would not meet the purpose and need or the Federal standard. However, Appendix L was the Clean Water Act Section 404(b)(1) evaluation for just the immediate need dredging action the Corps performed in 2015 and is not applicable to any other dredging action. It is unclear why this paragraph is included in this EA. Third paragraph – This paragraph starts out describing a generic disposal action, not the proposed action. It then shifts to a description of barges and cycle time, which appears to be an attempt to generically describe the use of barges (presumably bottom-dump barges?) and cycle time. The text should be revised to address the actual proposed action. It should use the quantities of material the Corps proposes to dredge under this action and the actual disposal site the Corps proposes to use – Bishop Bar. Fourth paragraph – This paragraph starts out discussing why in-water disposal in Lower Granite reservoir needs to be downstream of River Mile (RM) 120, but then switches to a statement about the state owning the original river bottom. However, the text never explains how any of this is related to the proposed action or the use of Bishop Bar as a disposal site. The text needs to be revised to explain why the	The second paragraph has been deleted.
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reader needs to know any of this information.	
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EA 24. Section 2.2.3 Sediment Disposal Location, Bishop Bar Located at River Mile 118 - This paragraph provides no detailed description of the Bishop Bar site or how the Corps would dispose of material on the site. There is no description of the water depth, how placement of the dredged material would change that depth, any strategic placement of the dredged material (i.e. placing cobbles from Ice Harbor on the bottom, then placing silty material from the Snake/Clearwater confluence, and finally placing sand from the Clearwater on top), the expected size and dimensions of the footprint that would be occupied by the dredged material, what the slope would be of the exposed surface, the intent of placing material at this site (is it to create shallow or at least mid-depth habitat for salmonids?), etc. The only figure of the disposal site in this EA is a water depth map. There is no figure showing the footprint that would be occupied by the dredged material or any cross sections showing how the river bottom contours would be changed. This lack of information is unacceptable for an EA, and especially this EA as the preferred alternative has been determined based on the dredged material disposal site and how the material would be placed. Neither this EA nor the Section 404(b)(1) evaluation in Appendix B provide detailed information on the use of the Bishop Bar site. Only the Biological Assessment contains any information about the intent of disposing at this site and includes a cross-section of how the bottom	This section of the EA provides the identified location and why the site features are suitable for selection as the disposal location. It includes a map that specifically provides the disposal area boundaries. This section does not provide the alternative impact assessment details the commenter is looking for as it is not written for that purpose. The immediately following sections provide the information on how the material would be placed and the sequence of such actions in sufficient detail.
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contours would be changed. The reader should not have to search the various appendices of the EA to find a description of a major feature of the proposed action.	
EA 25. Section 2.2.4 Sequence of Proposed Action Construction Elements – Item 8 of this list should be modified to say transport and placement of dredged material instead of transfer of dredged material. There is no transfer of the material – it is loaded directly onto the barge as it is being dredged.	Concur. Text modified.

EA 26. Section 2.2.5 Timing of the Proposed Action – It’s not clear what this section is describing. This used to be the section that described the project schedule. Instead, this section discusses placement of the dredged material, not timing of the proposed action. The majority of this information should be moved to Section 2.2.3 and be included in the description of how the disposal site would be used.	The first sentence of Section 2.2.5 clearly indicates that the timing of the proposed action would fall between December 15 and March 1, which includes dredging and by extension and necessity, dredged material disposal.
EA 27. Section 2.2.6 Monitoring – The first paragraph should also state the Corps is expecting water quality monitoring requirements to be included in the Clean Water Act Section 401 water quality certification it will be receiving from Washington Department of Ecology.	The Corps received CWA Section 401 water quality certification from Ecology on August 30, 2022, therefore the text in the EA has been modified.
EA 28. Section 2.2.6.1 Turbidity Monitoring – This paragraph should be revised to indicate the Corps contractor would also monitor turbidity to meet state water quality standards in Idaho. Even though the Corps does not need to obtain Section 401 water quality certification from Idaho Department of Environmental Quality, the Corps will be requiring its contractor to meet Idaho state water quality standards (see Appendix A Monitoring Plan). The text should be revised to correctly reference the information provided in Figure 2-9. The text cites the figure at the end of a statement about the transmitting capability of the monitoring equipment, but Figure 2-9 shows the location of the turbidity monitoring stations relative to the dredge. If this section is going to include a figure showing the monitoring stations for	The Corps has added the recommended notation for clarity.

the dredging site, it should also show the figure for the monitoring stations at the disposal site as the configurations are not identical.	
EA 29. Section 2.2.7.2 Lamprey – The EA should state when the Corps proposes to survey for lamprey and how they propose to do the survey, including a brief description of the survey methods and locations.	The Corps has added the recommended notation for clarity.
EA 30. Section 2.2.8 Timeline – This section appears to be almost a repeat of Section 2.2.5 Timing of the Proposed Action. Suggest consolidating this information in just one section.	Repeated information does not interfere with reader understanding.
EA 31. Section 2.2.10 Best Management Practices – Explain how in-water disposal at only the Bishop Bar disposal site is considered to be a best management practice. This EA has not provided any information so far that would lead the reader to that conclusion.	This section is not intended to justify BMPS, rather to enumerate them in one location. The environmental justification for Bishop Bar as the least environmentally damaging practicable alternative (LEDPA) is provided in the Clean Water Act Section 404(b)(1) Evaluation which is Appendix B.

EA 32. Section 3 Affected Environment and Environmental Consequences – In the first paragraph, the statement that the proposed action would not impact noise, aesthetic/visual quality, or air quality is incorrect and the text should be revised. The proposed action would affect these resources, but the effects would be minimal. The dredging equipment and scows would produce noise during the dredging and disposal actions and people using the shoreline would notice it. However, the noise levels would not be excessive, would be similar to some of the other industrial noises in the surrounding area, and would cease when the equipment was not actively being used. Regarding aesthetic/visual quality, the sight of the dredging and disposal equipment could be disturbing to some people, but could be of interest to others. The dredging and disposal actions would likely create a visible turbidity plume, but the plume would not extend very far downstream and would be expected to dissipate quickly. The diesel engines of the dredge and the scows would release exhaust into the air, but these emissions would have a de minimus effect on air quality.	The Corps has clarified that impacts to Noise, Land Use, Climate Change, Aesthetics/Visual Quality, or Air Quality are minimal. Table 3-1 already provides the detailed rationale.
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EA 33. Section 3.1.1.1 Sediment Transport – This appears to be more of a description of sediment transport in general and is not addressing sediment transport for the proposed site-specific action. This text is more applicable to the PSMP FEIS and not the action addressed in this EA. The text should be revised to address sediment transport at the Snake/Clearwater confluence and the downstream navigation lock approach at Ice Harbor. It should also explain that the problem at Ice Harbor is not really sediment deposition, but the redistribution of rock in the tailrace caused primarily by spill for fish passage.	Comment noted. As the general description of the affected environment, this summary of sediment transport similar to that from the PSMP FEIS is appropriate. The final two sentences connect the system topic to the local problem being addressed in the proposed action.
EA 34. Section 3.1.1.2 Sediment Quality – The first paragraph is describing conditions in the larger Snake River watershed that was the study area for the PSMP FEIS and is not describing conditions for this proposed site-specific action. The text should be revised to be applicable to this proposed action.	Comment noted. As the general description of the affected environment, this summary of sediment transport similar to that from the PSMP FEIS is appropriate. The final sentences connect the system topic to the local problem being addressed in the proposed action.

EA 35. Section 3.1.1.2 Sediment Quality – The second paragraph fails to provide a description of the 2019 sediment sampling performed to support proposed dredging and disposal action or a summary of the results. No information is provided on what testing was performed or what the results were. This section should state that the sampling and analysis adhered to the protocols in the 2018 Sediment Evaluation Framework for the Pacific Northwest and the 2018 Dredged Material Evaluation and Disposal Procedures. The section should disclose the particle size, the amount of total organic carbon (TOC), and any chemicals of concern that were found. The results of the sediment sampling and analysis are a critical piece of information for this proposed action as sediment quality determines whether or not the dredged material can be placed in-water or must be disposed upland. Just stating that the sediment is suitable for in-water disposal does not meet the requirements of NEPA. The EA should also state that the Seattle District Dredged Material Management Office determined the material was suitable for unconfined in-water disposal and provide the date that office made that determination.	The section acknowledges the 2019 sediment sampling and describes its results in summary. The section has been edited to reflect the DMMO had a role in determining the suitability of the sediments for in water disposal.
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EA 36. Section 3.1.2.2 Alternative 2: Proposed Action – Immediate Need Dredging: The text does not provide an adequate description of the effects of the proposed action on sediment. It does not address the effect on sediment transport, which would likely be negligible. The text makes a statement that the sediment is suitable for in-water disposal, but provides no information or analysis to support that conclusion. The Corps needs to revise this section to disclose how it concluded there would be no effect on sediment quality.	The section has been edited to provide more complete information.
EA 37. Section 3.2.1 Affected Environment – This section does not provide an adequate description of water quality at the proposed dredging sites or the disposal site. It makes some broad statements about water quality in general in the Snake and mentions that reaches of the Snake River are on the Clean Water Act Section 303(d) list, but does not mention if any of the proposed dredging sites or the disposal site are within those reaches. It does not mention turbidity, although effects on turbidity are the main effect discussed later in Section 3.2.2.2, the Environmental Consequences analysis section for water quality effects of the preferred alternative. This section addresses water quality in the Snake River in Washington, but makes no mention of the Clearwater River in Idaho. Because the Corps is proposing to also dredge part of the Clearwater River, information on water quality in that river also needs to be included.	The summarized information is sufficient as the PSMP FEIS and the 404(b)(1) analysis provides the detailed information that does not need to be repeated here. However, the Corps has added a brief description of the conditions in the Clearwater River as well.

EA 38. Section 3.2.2.2 Alternative 2: Proposed Action – Immediate Need Dredging – The third paragraph discusses effects of turbidity, not how the proposed action would affect turbidity. (The effects on fish need to be moved to Section 3.3 Aquatic Resources.) This text should be revised to indicate how the proposed action would be expected to affect turbidity levels. This should be based on the results of the previous dredging and disposal actions that were very similar to the currently proposed action. The Corps performed near-real-time water quality monitoring of its last two dredging actions in 2005/06 and 2015 and prepared reports summarizing the results of the monitoring. The Corps should review those reports when revising this section.	Turbidity is the primary water quality environmental effect parameter of the proposed action (dredging and disposal of dredged material) that is an indicator of further dependent environmental effects. The discussion in the section correctly references background turbidity levels and thresholds for negative impacts to salmonids. The impact to turbidity relative to these thresholds is the appropriate analysis in this section. Secondary water quality related impacts to other resources like fish is addressed in those sections specifically. Mentioning that the primary concern related to those effects are relative to salmon is appropriate however.
EA 39. Section 3.2.2.2 Alternative 2: Proposed Action – Immediate Need Dredging - The fourth paragraph states dredging in the areas with finer sediments would have the greatest effect on water quality, but does not say what those effects would be. The text should be revised to indicate what effects the Corps anticipates. Also, by stating that dredging the finer sediments would have the greatest effect on water quality, that begs the question of what effects would be expected from dredging the other sediments. The Corps should explain that most of the material to be dredged is sand, which does not have as much fine material in it. The Corps should also explain that most of the material to be dredged at Ice Harbor is cobble and would not have many fines that would create turbidity.	The Corps has clarified that most of the sediment to be removed is sand at the Snake and Clearwater River confluence and that the material is cobble at the Ice Harbor dredging location.

EA 40. Section 3.3.1 Affected Environment – This mention of Lake Wallula in Section 3.3 Aquatic Resources is the first time in the EA that Lake Wallula is mentioned. Only readers who are aware that the Ice Harbor downstream navigation lock approach is actually in Lake Wallula, the reservoir formed by McNary Dam, would be able to guess why the EA is mentioning this lake. If the Corps intends to refer to Lake Wallula here, it should revise the introduction section of the EA to identify the lake and explain how it related to the proposed action.	The Corps has edited for clarity.
EA 41. Section 3.3.1.2 Benthic Species – This section appears to include a lot of information about aquatic resources in the Snake River basin, but not necessarily in the locations the Corps is proposing to dredge or dispose of the dredged material. It is unclear why a description of aquatic organisms in Hells Canyon or benthic organisms in a pre-dam environment are relevant to the proposed action. The text should be revised to help the reader understand why this information is relevant.	The sections provide multiple specific references to data relevant to the Lower Granite dam pool and to the surrounding areas, which directly informs potential benthic organisms in the project area.
EA 42. Section 3.3.1.3 Fish – This section addresses only anadromous fish, Endangered Species Act (ESA)-listed fish, and sturgeon, and makes no mention of other fish species, either native or introduced, that may be found in the project area. The EA should at least mention that other species are found in the project area or provide some reason why they are not addressed.	The sections provide information on the most important fish species in the region. As a tiered EA, there is no need to provide a full accounting or to repeat more in-depth analyses provided in the parent document and its references.

EA 43. Section 3.3.1.4 Threatened and Endangered Aquatic Species, Snake River Spring/Summer Run Chinook Salmon – The last sentence states that spring/summer Chinook spawn in shallow water habitat of the mainstem river channel, but it is not clear if means in the reservoirs, or upstream of the reservoirs.	The statement is intentionally not further detailed so as to be inclusive of river reaches with levels influenced by dams and not influenced by dams.
EA 44. Section 3.3.1.4 Threatened and Endangered Aquatic Species, Snake River Fall Chinook Salmon – The fourth sentence seems to indicate that fall Chinook spawn in Lower Granite Dam. Perhaps is meant to state they spawn in the tailrace below the dam. The EA should also mention they have spawned below Lower Monumental Dam.	This text is speaking of spawning populations, not individuals. The occurrence of individuals that may spawn downstream of Lower Granite Dam are a tiny fraction of the population.
EA 45. Section 3.3.1.4 Threatened and Endangered Aquatic Species, Sturgeon – Sturgeon are not listed under ESA, and therefore should not be included in the section on Threatened and Endangered species. They should be put in a separate section.	The Corps has edited to correct the heading for non-listed fish.
EA 46. Section 3.3.2.1 Alternative 1: No Action Alternative, Effects on Aquatic Plants – The Affected Environment description for Section 3.3 Aquatic Resources does not include any information on aquatic plants. The EA should be revised to include that information, including something that would help explain why this environmental consequences discussion is specifically mentioning shallow-water aquatic plant habitat in reservoirs.	The Corps has edited to eliminate describing effects on aquatic plants as they are minimal to none and should not be discussed in further detail in the tiered EA.

EA 47. Section 3.3.2.1 Alternative 1: No Action Alternative, Effects on Fish (Including Threatened and Endangered Species) – The text should be revised to explain what the last sentence is trying to address. It appears to be trying to explain the effects on outmigrating juvenile salmonids from operating the reservoirs under the Navigation Objective Reservoir Operation measure.	This is a direct paraphrase from the FEIS (Section 4-4 Effects on Fish).
EA 48. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Plankton and Benthic Community – The first paragraph states that plankton communities would not be affected by the navigation objective reservoir operations, but from the descriptions of the alternatives in Section 2, only Alternative 1 includes that operational measure. Therefore, this paragraph should be deleted from this description of the environmental consequences of Alternative 2.	The Corps has deleted the first sentence as recommended.
EA 49. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Plankton and Benthic Community – In the fourth paragraph, the EA does not explain why it is mentioning studies at the Knoxway Canyon site. Knoxway Canyon was the submerged bench that the Corps used for dredged material placement for the last two dredging actions and the Corps used the dredged material to create shallow-water habitat at the site for juvenile fall Chinook. However, the description of the proposed action in this EA does not seem to include a similar provision to use the dredged	The Corps has rearranged the order of paragraphs 3 and 4 to read more clearly. Further, as the proposed action lacks sufficient dredged material to create shallow-water habitat, but only lay the foundation for potential future shallow water habitat, further explanation of the results of new shallow water habitat are conjectural. The studies mentioned do speak to how rapidly sites can be recolonized by benthic organisms in the action area and are appropriate context in evaluating the duration of potential effects.

material to create shallow-water habitat at Bishop Bar. The last paragraph should also mention that the new substrate at the disposal site would also be expected to be recolonized soon after placement of dredged material was completed.	
EA 50. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Aquatic Plants – The second paragraph addresses the effects of placing material within shallow water areas, but the description of Alternative 2 in Section 2 does not mention any such placement as part of this alternative. The last sentence of the paragraph mentions continuation of dredged material placement, but it is unclear what this means. If it means the Corps intends to place dredged material at the Bishop Bar site as part of a future dredging action, the Corps should state that.	The second paragraph provides a useful comparison between the shallow water (previous actions) and deep water (current proposed action) sediment disposal. Last sentence revised as follows: "The potential future in-water disposal of dredged material at Bishop Bar, on the other hand, would enlarge this shallow water area that could be colonized by aquatic plants."

EA 51. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Fish (Including Threatened and Endangered Species) – The third paragraph lists several ESA- listed fish species that are likely to be at the lowest densities during the winter in-water work period, but does not mention fall Chinook as one of those species. Fall Chinook are usually included in this list. The EA should either be revised to include fall Chinook, or explain why they are not considered to be a low densities during the in-water work window. The fifth paragraph starts out by mentioning the pelagic orientation of migrating salmonids, yet the Affected Environment section does not show any migration by salmonids in the winter when the proposed action would take place. The EA should either explain how the orientation of migrating salmonids is relevant to the proposed action, or delete the sentence.	The fourth paragraph of the section does begin to describe fall chinook effects and fall chinook have an entire subsection dedicated to examining potential effects to them starting on the next page. Fall chinook effects are appropriately addressed in the EA. The fourth paragraph referring to pelagically oriented fish is focused upon describing where the fish either may not be present at all, or if present, where they are likely to be in the water column, appropriately providing context for potential effects.
EA 52. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Fish (Including Threatened and Endangered Species) – In the sixth paragraph, the EA should be revised to explain why dredging in cold weather would not affect temperature or dissolved oxygen.	The fifth and following paragraphs appropriately focus detailed discussion on what effects the action could have on water quality, not on the effects it would not have.
EA 53. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Fish (Including Threatened and Endangered Species) –In the seventh paragraph, the meaning of the first sentence is not clear. The first part of the sentence appears to be a description of the anticipated turbidity plume from	The paragraph being commented on and the following paragraph do appropriately discuss turbidity, the effects of turbidity on fish, and the monitoring associated with turbidity as the water quality monitoring parameter of interest to ensure effects to fish would be less than significant.

dredging, while the second part of the sentence appears to be talking about the water quality monitoring. These are two different subjects and should be discussed separately.	
EA 54. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Fish (Including Threatened and Endangered Species), Fall Chinook – The description of the effects on fall Chinook appears to be a series of paragraphs copied from other documents and just thrown together with no attempt to edit them to tell a cohesive story that relates to the proposed action. The descriptions jump around from discussions about adults, then juveniles, then just “fall Chinook”, and two paragraphs discuss steelhead or other salmon, not fall Chinook. Three of the paragraphs discuss juvenile fall Chinook use of shallow-water rearing habitat created by in-water placement of dredged material, but it is unclear why they are included as the description of Alternative 2 in this EA does not state that the dredged material would be used to create shallow-water habitat at Bishop Bar. The first sentence of the last paragraph talks about the effects of deep-water dumping of dredged material, but deep-water disposal at a deep water site is not included as part of the description of Alternative 2. The Corps should revise its description of Alternative 2 to include a more clear explanation of its intent for placing the dredged material at Bishop Bar,	This section is technical in nature but does provide detailed information regarding the potential direct, indirect, and cumulative impacts to fall chinook and its habitats in the context of the area, and appropriately mentions other species that could experience similar effects. The last paragraph in the section effectively summarizes the discussion. The Bishop Bar site is a 60-foot deep disposal location that has the potential to be used for the creation of future shallow water habitat development.

then revise this section to more clearly address the effects of the dredging and disposal on fall Chinook.	
EA 55. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Fish (Including Threatened and Endangered Species) – This section appears to be missing some text discussing effects on fish species. The text addresses effects on fall Chinook, bull trout, sturgeon, and Pacific lamprey, but does not mention the effects on the other ESA-listed species discussed in the Affected Environment section. The missing species are summer/spring Chinook, sockeye, and steelhead. The text should be revised to either include the missing species, or explain why they are not included.	A summary description of potential effects to other T&E species has been added.

EA 56. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Fish (Including Threatened and Endangered Species), Sturgeon – The EA should revise the statement about potential spawning in dam tailraces to focus on just Ice Harbor Dam as that is the only dam tailrace that the Corps is proposing to dredge as part of this action.	Comment noted. The EA statement regarding area dam tailraces is general in nature and not specific to Ice Harbor. Ice Harbor is a dam where such spawning could occur. The effects analysis focuses on the Ice Harbor dam tailrace.
EA 57. Section 3.3.2.2 Alternative 2: Proposed Action – Immediate Need Dredging, Effects on Fish (Including Threatened and Endangered Species), Pacific Lamprey – In the second paragraph, the EA should mention whether or not the BMP's could be implemented for the Ice Harbor navigation lock approach dredging site. The text only mentions not being able to implement them at the Snake/Clearwater confluence. The last paragraph should address whether or not the dredged material placed at Bishop Bar could provide suitable substrate for lamprey ammocoetes.	The text of the EA has been clarified to describe that the BMPs are not applicable to the Ice Harbor tailrace. While it is possible that future dredged material placement over the currently proposed disposal could result in suitable substrate for lamprey ammocoetes, that is not part of the proposed action and is conjectural in nature.
EA 58. Section 3.4.1 Affected Environment – This section mentions recreational opportunities in general on the Snake River reservoirs, but does not describe recreation that takes place in the vicinity of the proposed dredging and disposal areas. The EA should mention that Blyton Landing, a recreation facility with a boat ramp, is less than a mile upstream of the Bishop Bar disposal site and on the same side of the river as Bishop Bar. There are also several recreation sites on the shoreline adjacent to the areas to be dredged at the Snake/Clearwater confluence.	Section 3.4.1 appropriately references Section 3.3 of the PSMP FEIS where more detailed information regarding recreational opportunities in each reservoir. As a tiered document incorporating by reference the more detailed analyses in other documents, the Corps sees little value to decision making in repeating the detail found in referenced and incorporated documents.

EA 59. Section 3.5.1.2 Vegetation – The affected environment text in the EA describes upland vegetation, but upland vegetation would not be affected by the proposed action. The affected environment text does not describe riparian vegetation, but the EA states in the environmental consequences section that Alternative 1 would have a minor effect on riparian vegetation and Alternative 2 would have no effect. The EA needs to be revised to include a description of the affected riparian vegetation in the affected environment section.	The Corps had edited Section 3.5.1.2 to describe the limited amount of riparian vegetation in the project area and to clarify that it is included in the ‘upland’ vegetation definition (as opposed to aquatic vegetation) for purposes of this analysis.
EA 60. Section 3.5.1.3. Threatened and Endangered Terrestrial Species, Spalding’s Catchfly – The last sentence of the second paragraph lists five boat basins, none of which would be affected by the proposed action. It is unclear why this list of boat basins is included, especially since all of the habitats listed in the EA for this species are upland and would not be affected by the proposed action. Suggest deleting this list of boat basins as it is not relevant to the proposed action.	The Corps has edited the section as recommended for clarity.
EA 61. Section 3.5.2.1 Alternative 1: No Action Alternative – The first sentence of the Environmental Consequences description for Alternative 1 states that reservoir operation would result in a continuation of normal operation of the pools, which is not a correct description of this measure, the Navigation Objective Reservoir Operation. The affected reservoirs would not fluctuate over their entire operating range and instead would be held to one or more feet above MOP.	The Corps has edited the first sentence of the section and the impact assessment language for clarity.

This description of effects under Alternative 1 should be revised based on the correct understanding of the measure being used. This description should also be revised to include a determination of the effect Alternative 1 would have on Threatened and Endangered terrestrial species.	
EA 62. Section 3.6.1 Affected Environment – The first paragraph describing the affected environment for socioeconomics and environmental justice lists three counties in Washington, Columbia, Garfield, and Walla Walla, as part of the “proposed action area” even though no dredging or disposal would take place within those counties. The EA should either explain why these counties are being included in this section, or delete references to them.	The proposed action includes traversing through counties other than those where active dredging and disposal would occur. The EA appropriately acknowledges the potential for impacts, although agrees that impacts would likely be discountable in these ‘non-dredging’ locations.
EA 63. Section 3.6.2.1 Alternative 1: No Action Alternative – The information in the second paragraph on the effects to navigation from sediment accumulation in the channel should be included in the purpose and need section as this addresses the need for the proposed navigation channel maintenance dredging.	The purpose and need as written describes how depositing sediment negatively affects navigation, as well as hydropower, fish bypass systems, irrigation, and recreation.

EA 64. Section 3.7 Historic and Cultural Resources – Both the Affected Environment and the Environmental Consequences subsections are mostly general statements about historic and cultural resources in the Snake River area and do not provide site-specific information related to the dredging or disposal sites. Suggest revising this section to include more site specific information, especially about historical use of Bishop Bar. As a minimum, the Corps could have looked at its library of pre-dam photographs of the lower Snake River from the 1950's to see what use was occurring at the Bishop Bar site. A quick search on the internet revealed a photo of a fruit packing shed operated by the Bishop brothers on the Snake River, although it was not clear if the shed was located at the Bishop Bar disposal site.	The EA evaluated archaeological sites and districts, traditional cultural properties, and historic properties. Section 3.4 of the PSMP FEIS provides added details. Further, some archaeological and historic information is protected and should not be disclosed in detail.
EA 65. Section 3.8.2.1 Aquatic Resources Fish Species – The heading of this cumulative effects section mentions “fish species”, the text only mentions threatened and endangered fish when determining the geographic boundary for the cumulative effects analysis, and Table 3-6, Geographic and Temporal Boundaries of the Cumulative Effect Area, just calls it “Aquatic Resources”. The EA should be consistent on what resource it is evaluating in the cumulative effects analysis.	Threatened and endangered species are the most sensitive species in greatest peril and therefore the appropriate focus when considering fish species in the proposed work area. Other species are unlikely to experience any notable or measurable cumulative effects. However, the Corps has clarified the EA by editing the heading of section 3.8.2.1 to avoid misunderstanding.

EA 66. Section 3.8.5.2 Alternative 2: Proposed Action – Immediate Need Dredging, Aquatic Resources – The middle of this paragraph on cumulative effects mentions that beneficial use of dredged material could have a beneficial effect for fish and would contribute to improving habitat in the lower Snake River, which implies that Alternative 2 is proposing to use the dredged material to improve fish habitat at Bishop Bar. However, the description of Alternative 2 in Section 2 of the EA does not say the disposal at Bishop Bar was designed to improve fish habitat. The description of Alternative 2 should be revised if the Corps intends this use of the dredged material at Bishop Bar.	While the Corps is not proposing to develop shallow water habitat as a result of the current immediate need action, the EA has been clear that future dredging actions, were they to occur, could result in such habitats at Bishop Bar if the proposed disposal were to be added to. Therefore, such possible future benefits are reasonable to include as a possible future benefit in a cumulative effects analysis.
EA 67. Section 3.8.5.2 Alternative 2: Proposed Action – Immediate Need Dredging, Water Quality – The second sentence mentions the effects of “in-water placement of dredged material (either for beneficial use or disposal)...”, but the description of Alternative 2 does not include these two disposal options, rather it includes only the use of the Bishop Bar site for the placement of the dredged material site and doesn’t really define if that is considered to be for beneficial use or just disposal. This discussion in the cumulative effects analysis should only be describing effects of the actual disposal site/action being proposed.	Section 3.8.5.2 is an analysis of the cumulative effects of the proposed alternatives IN ADDITION to past and reasonably likely to occur future actions. The details noted by the commenter are those aspects of past and reasonably likely to occur future actions.

EA 68. Section 4 Preferred Alternative – The description of the disposal site mentioned in the last two sentences of the first paragraph needs to be moved to the description of Alternative 2 in Section 2.2. The reader should not have to get to the end of the EA to find important details about the preferred alternative.	The Corps has edited the preferred alternative description in Section 2.2 to include the details noted in Section 4.
EA 69. Section 4 Preferred Alternative – It's not clear what this section is intended to do. If there were several alternatives being evaluated, this section would probably identify which one is the preferred alternative and explain why the Corps selected it. Instead, this is just a partial rehash of the Alternative 2 description. Suggest revising this section to explain why this is the preferred alternative and deleting the last two paragraphs.	Section 4 has been edited for clarity to describe why it is the preferred alternative. As the only action alternative available as tiered from the PSMP FEIS, Alternative 2 is the default preferred alternative.
EA 70. Section 5.2.1 National Environmental Policy Act – This section is where the Corps should explain that this EA is tiered off the PSMP FEIS. Instead, this is just a standard boiler-plate description of NEPA process. For this proposed dredging action, if the Corps identified any significant impacts, the Corps would prepare a supplement (SEIS) to the PSMP FEIS, not a stand-alone EIS. The EA should be revised to reflect this.	Section 5.2.1 has been edited to discuss how this EA is tiered from the PSMP FEIS.

EA 71. Section 5.2.2 Clean Water Act – The first sentence of the third paragraph is not a complete sentence. Replace the parentheses around the phrase “which includes the disposal of dredged material into waters of the U.S.”, and that changes the sentence so it is actually making an argument as to why the proposed action needs Section 404 compliance. The third paragraph is difficult to understand and should be revised to provide clarity. For example, the EA states Section 401 compliance stipulates authority to Washington Department of Ecology, but that is not correct. Rather, Ecology requested and received that authority from the U.S. Environmental Protection Agency. The EA should just state that Ecology has the authority to issue Section 401 water quality certification for the placement of dredged material in the lower Snake River in Washington, then state the Corps has coordinated the dredging and dredged material placement with Ecology and requested Section 401 water quality certification on May 24, 2022 for the in-water placement of the dredged material.	The third paragraph of section 5.2.2 has been edited to remove the parentheticals. The paragraph has been updated to reflect CWA Section 401 certification received following the public comment period.
In the last paragraph, suggest not using acronyms for the Ports of Lewiston or Clarkston. The acronyms are distracting and they are not used anywhere else in the EA except in this section and Section 5.2.3 when discussing Corps Regulatory permits the Ports need to obtain.	The Corps has edited the paragraph for readability by reducing acronyms.

The last paragraph states that the Port of Lewiston does not need Section 401 water quality certification from IDEQ as no dredged material from the Port would be placed in-water in Idaho, but it does not address the need for Section 401 from Ecology for the in-water placement of dredged material in Washington. Because all of the dredged material from the Port would be placed in-water at the Bishop Bar site in Washington, the Port should be requesting Section 401 water quality certification from Ecology.	The Port of Lewiston did request and receive Clean Water Act Section 401 water quality certification from IDEQ. However, the Port of Lewiston was not required this time to request Clean Water Act Section 401 water quality certification from Ecology.
EA 72. Section 5.2.4 Endangered Species Act - The second paragraph states the Corps prepared a biological assessment for the proposed action and is in formal consultation with the Services. However, this section does not explain why additional formal consultation is needed for implementing the PSMP considering the Corps already consulted with the Services in 2014 for implementation of the programmatic plan (PSMP). Clarify why the Corps needs to do this additional consultation if it is not exceeding the thresholds shown in Appendix A to the 2014 programmatic biological assessment.	The Corps coordinated with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service and determined additional consultation was appropriate to ensure the Corps meets its requirements under the Endangered Species Act.
EA 73. Section 6.1 Tribal and Agency Consultation and Coordination, Tribal Consultation and National Historic Preservation Act Section 106 Coordination – The first paragraph says the Corps offered Government to Government consultation, but did not say if any of the Tribes	The Corps has edited to reflect tribal requests for Government-to-Government consultation received during the public comment period.

EA 74. Section 6.1 Tribal and Agency Consultation and Coordination, Clean Water Act Compliance and Coordination – The text for this section is just a repeat of Section 5.2.2, which is a description of how the proposed action is in compliance with the Clean Water Act. However, this section is supposed to be addressing consultation and coordination, not the overall compliance with the Act. This text should be revised to address only the coordination and consultation aspects of the Clean Water Act.	For a proposed dredging and disposal action such as this, the Clean Water Act (CWA) compliance is multifaceted and complex. The Corps has provided detailed information in Section 5.2.2 as to how CWA compliance was achieved. It is true that Section 6.1 (Consultation, Coordination, and Public Involvement) is there to provide the reader with information regarding how the Corps completed its coordination requirements with the certifying authority. In this case, compliance with the CWA and coordination with the Washington State Department of Ecology essentially require the same steps so there is some duplicate verbiage provided. It is the Corps' opinion that our CWA compliance explanation in Section 5.2.2 and our CWA coordination in Section 6.1 both meet the intent of the section and thoroughly explain to the reader the steps we took for compliance and coordination.
EA 75. Section 6.2 Public Review – Draft Finding of No Significant Impact and Environmental Assessment – The statement about what NEPA documentation the Corps would prepare if significant effects are identified is incorrect. Because the proposed action is being implemented as part of the PSMP and this EA is tiered off the PSMP FEIS, the Corps would prepare a supplement (an SEIS) to the FEIS, not a separate environmental impact statement (EIS), if significant effects are identified and an EIS-level analysis is needed.	The Corps has clarified that an SEIS specifically would have applied if additional significant effects had been identified
A.1. Section 1 Introduction – The second paragraph states the monitoring plan addresses concerns raised in previous ESA consultations, including viability of fish habitat and stability of the disposal embankment. However, the description of the proposed disposal in Section 2 of the EA does not mention using the dredged material to create fish habitat	The proposed action would not result in fish habitat, therefore monitoring the effectiveness of such habitat is not applicable.

and this monitoring plan does not include any monitoring of the disposal site post-disposal to determine if the site is providing fish habitat. This text should be revised to reflect the currently proposed action.	
A 2. Section 3.3 Post-dredging and Disposal – This section states the Corps will perform biological surveys after completion of the disposal activities, but provides no information on what those surveys would be. In the 2014 monitoring plan, the Corps planned to perform biological surveys of the shallow water habitat created by the placement of the dredged material. However, the description of the preferred alternative for 2022 does not seem to indicate the placement of dredged material at Bishop Bar is designed to create similar habitat. If the Corps does not intend to conduct biological surveys after disposal is complete, the text should be revised to delete reference to those surveys.	The Corps has clarified Section 3.3 to indicate that post-completion biological surveys are not applicable to this action.

B 1. General comments - The Corps appears to have copied the PSMP EIS 2014 Section 404(b)(1) Evaluation when preparing this appendix and edited the text to address the currently proposed action. This is an appropriate approach as the dredging and disposal action proposed in 2022 is almost identical to the action evaluated in 2014. However, when editing the 2014 document, the Corps failed to include important details about the proposed in-water disposal at Bishop Bar that are needed to justify how it meets the Section 404(b)(1) guidelines, and it failed to update some of the information to reflect current conditions. These errors are addressed in some of the comments below. The only disposal site that has changed from the 2014 document is the Bishop Bar site. In 2014 the Corps identified Knoxway Canyon, River Mile (RM) 116 as the proposed disposal site. The 2014 document provided detailed information on the characteristics of the submerged bench at Knoxway and how the Corps would strategically place dredged material and reshape the material to create shallow water habitat for juvenile fall Chinook. The Corps used the detailed information and a description of the current state of shallow water habitat in Lower Granite reservoir to help show that disposal at Knoxway Canyon provided greater environmental benefits and had fewer adverse effects on the aquatic environment than the deep water disposal alternative at RM 119, and was therefore the proposed use of the Knoxway Canyon site was the	The Corps has modified the 404(b)(1) to clarify that Bishop Bar is the least environmentally damaging, practicable alternative and text has been added in regards to the disposal of dredged material at Bishop Bar could be considered a "base" for future shallow water habitat if the Corps must dredge the channel again before the future forecast long-term NEPA analysis for sediment management is complete and/or the completed future forecast long term NEPA analysis determines that maintenance dredging every 3 to 7 years is a viable sediment management measure and is therefore incorporated into the recommended plan.
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least environmentally damaging practicable alternative (LEDPA) and was the alternative that best met the Clean Water Act Section 404(b)(1) guidelines. The 2015 disposal action used up the rest of the capacity of Knoxway Canyon site, so the Corps has now identified Bishop Bar as an in-water disposal site. However, the Corps has not provided any detailed description of how the dredged material would be placed at Bishop Bar and how that would affect (and possibly benefit) the aquatic environment. The Corps does not appear to have edited the text that compares the effects of in-water disposal at Bishop Bar to that of in-water disposal at the deep water site (RM 119). That text was written to compare Knoxway Canyon to the RM 119 disposal and is not applicable to the currently proposed action. The text needs to be revised to provide a meaningful comparison between the two in-water disposal alternatives being considered for the currently proposed action and determine which is the LEDPA and should be implemented. The only disposal site that has changed from the 2014 document is the Bishop Bar site. In 2014 the Corps identified Knoxway Canyon, River Mile (RM) 116 as the proposed disposal site. The 2014 document provided detailed information on the characteristics of the submerged bench at Knoxway and how the Corps would strategically place dredged material and reshape the material to create shallow water habitat for juvenile fall Chinook. The Corps used the detailed information

and a description of the current state of shallow water habitat in Lower Granite reservoir to help show that disposal at Knoxway Canyon provided greater environmental benefits and had fewer adverse effects on the aquatic environment than the deep water disposal alternative at RM 119, and was therefore the proposed use of the Knoxway Canyon site was the least environmentally damaging practicable alternative (LEDPA) and was the alternative that best met the Clean Water Act Section 404(b)(1) guidelines. The 2015 disposal action used up the rest of the capacity of Knoxway Canyon site, so the Corps has now identified Bishop Bar as an in-water disposal site. However, the Corps has not provided any detailed description of how the dredged material would be placed at Bishop Bar and how that would affect (and possibly benefit) the aquatic environment. The Corps does not appear to have edited the text that compares the effects of in-water disposal at Bishop Bar to that of in-water disposal at the deep water site (RM 119). That text was written to compare Knoxway Canyon to the RM 119 disposal and is not applicable to the currently proposed action. The text needs to be revised to provide a meaningful comparison between the two in-water disposal alternatives being considered for the currently proposed action and determine which is the LEDPA and should be implemented.

B 2. Section 1 Introduction, first paragraph -The Corps states the in-water work would take place December 15 to March 1, but does not state what year. The EA states the work would be performed in the winter of 2022-2023. This text should be revised to indicate the Corps proposes to perform the work in 2022-2023.	Concur. The text has been revised as suggested.
B 3. Section 2.1 Dredging Site Information, third paragraph, first sentence – The Corps should clarify what is meant by the statement “The proposed action would restore the federal navigation channel to the congressionally-authorized depth of 14-feet deep and 250-feet wide deep (and adjacent port berthing areas)” As written, it appears to indicate the port berthing areas will also be restored to the same dimensions as the federal channel. However, the ports have not always elected to have their berthing areas dredged to the same depth as the federal navigation channel.	Concur. Paragraph revised.
B 4. Section 2.1 Dredging Site Information, third paragraph, first sentence - Verify that Section 109 of WRDA 1992 applies to this currently proposed access channel maintenance to the Port of Clarkston berthing areas. For several previous Port access channel dredging actions, the Corps has determined the WRDA 1992 authority was a one-time authority that only applied to dredging needed to address the adverse effects of the 1992 Snake River drawdown test on Port access (Lower Granite and Little Goose reservoirs were drawn down to test drawdown as a possible option to	Verified that Section 109 of WRDA 1992 is accurately cited.

improve juvenile salmonid migration conditions). The Corps determined the authority did not apply to routine maintenance dredging of Port access.	
B 5. Section 2.1 Dredging Site Information, Confluence of Snake and Clearwater Rivers (Federal Navigation Channel), second paragraph - The first sentence reads as if the federal channel moves around, but is currently in front of the Lewiston grain terminal dock. Suggest revising the text to better explain what point the Corps is trying to make.	Concur. Text revised as suggested.
B 6. Section 2.1 Dredging Site Information, Figure 2-5 - The green areas do not appear to show all of the areas at the Snake/Clearwater Rivers confluence that are less than 16 feet deep at MOP. Based on the information presented in previous Corps documents addressing navigation maintenance actions at this location, the shoals should extend from the shoreline out to the waterward edge of the shoal in the vicinity of both ports. Instead, this figure portrays the shoals as a thin arcing line around the Port of Clarkston berthing areas and two small shoals at either end of the Port of Lewiston. Suggest revising this figure to more clearly display the shoaling.	No new figure is necessary.

B 7. Section 2.2. Purpose and Need, first paragraph - The second and third sentences should be moved to the description of the proposed dredging action and deleted from this section. These sentences are describing the practice of overdredging and advanced measures, neither of which are related to the purpose or the need for the dredging or in-water placement of the dredged material.	Concur. Text revised as suggested.
B 8. Section 2.2 Purpose and Need, first paragraph - The fourth and fifth sentences are statements about the federal standard and the least environmentally damaging practicable (the text incorrectly uses the term “practical”) alternative (LEDPA) are not related to the purpose and need and should be deleted from this section. They should be included in Section 2.3 Alternatives Considered as they are related to how the Corps selects the disposal alternative.	Concur. Text revised as suggested.
B 9. Section 2.2 Purpose and Need, first paragraph, sixth sentence - This Corps states that the federal navigation channel is currently filled with sediment, but does not provide any information to substantiate this claim (i.e. the Corps has not established that there is an actual need for the maintenance). The Corps also does not provide any information on what adverse effect the shoaling is currently having on the navigation channel uses. This section should be revised to include information on the current depths of the federal channel and port berthing areas, the extent of the shoaling areas, and what effects the shoaling is currently having on navigation and what effects might be	Concur. Text revised as suggested.

expected if the dredging does not take place.	
B 10. Section 2.2 Purpose and Need, second paragraph, last sentence – This sentence does not appear to apply to this currently proposed action and should be deleted or revised. The sentence says the PSMP FEIS includes the evaluation of potential environmental effects associated with the permit applications for related berthing-area maintenance at the Ports, but the PSMP FEIS was addressing the effects of the dredging action the Corps was proposing to perform in 2015, not the dredging proposed for 2022-2023 or port berthing area dredging in general. Perhaps the Corps meant to refer to the EA prepared for this immediate need action?	Concur. Sentence deleted.
B 11. Section 2.2 Purpose and Need, last paragraph - This paragraph is not related to either the purpose or the need for the action and should be deleted from this section. It is also not related to a Clean Water Act Section 404(b)(1) evaluation, rather this is related to the alternatives section of a NEPA document.	Concur. Paragraph removed.

B 12. Section 2.3.1.1 Upland – Ice Harbor Storage Yard - The Corps needs to update the description and figure for this proposed disposal site. A recent search of Google Earth shows a large building and fenced storage yard has been constructed on the upstream end of this site since the preparation of the 2014 404(b)(1) evaluation, so this site would have less area available for temporary stockpiling of dredged material.	Non concur. The site gets eliminated as a potential upland disposal site, so the fact that the figure is a bit out-dated, is not important.
B 13. 2.3.2.1 In-Water Placement at Bishop Bar, RM 118 - The description of this site, why the Corps would want to use it, and how the Corps would place the dredged material at site is inadequate. No information is provided to allow a comparison to the RM 119 open water disposal site to determine which disposal alternative is the LEDPA. There is no information on the current water depth, how the placement of the dredged material would change that depth, where in the site footprint the dredged material would be placed, whether or not the surface of the disposed material would be covered with sand and if it would be reshaped, a cross-section showing the site after placement, what the Corps would be trying to accomplish by placing dredged material at this site (in 2015 it was to create shallow-water habitat for juvenile fall Chinook), or how the material would be placed to achieve that objective. There are no figures showing the footprint that would be occupied by the dredged material or the cross-section showing how the river bottom contours would change. The only figure provided is a depth	Concur. Both sections in the 404(b)(1), Section 2.3.2.1 and Section 2.5, have been revised. Most of the expanded information is in Section 2.5 to describe in detail the current water depth, how placement of dredged material would change the water depth, where the material would be placed, the order of how material would be placed (cobbles on the bottom, fines on top). New figures have been added in Section 2.5. Information is provided regarding this disposal creating a base at Bishop Bar for the creation of future shallow water habitat. Text has been added to provide clarity to the reader that Bishop Bar outweighs open water disposal at River Mile 119, and truly is the least environmentally damaging, practicable alternative.

map with an inadequate color key to the depths and a barely visible cross-hatching showing the disposal area. The Corps has identified Bishop Bar as the proposed disposal site, yet it provides insufficient information on which to base that conclusion. The Corps makes claims later in this 404(b)(1) and in the EA that the placement of dredged material at Bishop Bar is for beneficial use, but the description of this alternative fails to provide any information on which to base that claim. This fails to meet the requirements of the Section 404(b)(1) guidelines.	
B 14. 2.3.2.2 In-Water – Open Water Disposal, RM 119 – This is not the proposed disposal alternative, yet it has much more detail than the description of the proposed site, Bishop Bar. This level of detail needs to be provided for use of the Bishop Bar site.	Concur. Paragraph revised.

B 15. 2.3.2.2 In-Water – Open Water Disposal, RM 119, second paragraph, last sentence - The footprint size needs to be verified. This document states the embankment created by dumping the dredged material in-water at RM 119 would have a footprint of 35.5 acres, which is the same footprint size used in the description of this site in the 2014 404(b)(1). However, in the 2014 document, the estimated quantity of material to be dredged was about 479,616 cubic yards, almost double the estimated 257,910 for the currently proposed action. As the description of how the dredged material would be placed has not changed from the 2014 document, it seems likely the size of the footprint would be smaller for the current action.	The sentence has been removed.
B 16. Section 2.3.3 Port Only Alternatives - The text describing the potential disposal sites for use by only the Ports appears to be identical to that used in the 2014 404(b)(1). Given that the 2014 document was prepared eight years ago, it is likely that some of the sites the Ports considered may have changed. Did the Corps coordinate with the Ports to obtain a list of sites they considered for the current action?	The Corps did coordinate with the Ports to obtain a list of sites they considered for the current action.

B 17. Section 2.4.2.2.1 In-Water Placement at Bishop Bar, RM 118 - This description of screening results for Bishop Bar is inadequate, especially because the Corps has identified the site as the LEDPA and the proposed disposal site for this action. Unlike the description of the proposed disposal site in the 2014 404(b)(1), this document provides essentially no description or analysis of how the dredged material would be placed and what effects that placement would have on the aquatic environment. It does not mention the effects of the bottom-dumped material falling through the water column, the effects to any benthic organisms at the site, or what effects it would have on any ESA-listed fish that may be present. The only environmental effect mentioned is that any turbidity would be short-lived. However, without any description of any other adverse effects or benefits to the aquatic environment from placing dredged material at this site, there is no information provided that would explain why this alternative meets the screening criteria for environmental acceptability or justifies identifying use of this site as the LEDPA.	Concur. Section 2.4.2.2.1 has been revised and expanded.
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B 18. Section 2.4.2.2.2 In-water – Open Water Disposal, RM 119 - The description of the environmental effects of this alternative do not show why it is not the LEDPA. It appears to indicate that it is not identified as the LEDPA because the aquatic habitat at the site is poor quality, yet being a poor quality site would seem to make it a better candidate for being the LEDPA. The description says use of this site would not have environmental benefits, but the description of the use of Bishop Bar does not describe any benefits, either. The RM 119 description appears to be trying to compare to effects at this site to effects at Bishop Bar, but the Bishop Bar description does not address these issues, making this a meaningless comparison. As the Bishop Bar and RM 119 screening analysis sections are written, it is impossible to determine which site should be the LEDPA. Both analyses need to be revised so a meaningful comparison can be made.	Concur. Section 2.2.2.2.2 has been revised.
B 19. Section 2.4.2.2.5 Upland – Silcott Island, first paragraph - This description needs to be updated to reflect the change in status of the amphitheater/artwork. The non-profit organization obtained the approvals from the Corps and the lessee and the artwork, known as a Listening Circle, was completed on Silcott Island in 2015. There was a dedication ceremony onsite and the District's commander at the time, Lt. Col. Timothy Vail, spoke at the ceremony.	Concur. Section 2.4.2.2.5 has been revised.

B 20. Section 2.4.2.2.6 Upland – Chief Timothy HMU, second paragraph - Verify that this site would still hold a little over 10 percent of the total amount of material that would be dredged. The 10 percent figure was used in the 2014 404(b)(1) when about twice as much material was proposed to be dredged as for 2022.	Section 2.4.2.2.6 states that this site would hold a little over 20 percent of the total amount of material that would be dredged.
B 21. Section 2.4.2.3 Port Only Alternatives - Same comment as B 16 above.	Coordination with the Ports occurred.
B 22. Section 2.5. In-water Placement at Bishop Bar, RM 118 - These few details about the Bishop Bar disposal site and how the dredged material placement would change the river bottom elevation need to be moved to the description of the alternative in Section 2.3.	Section 2.5 has been revised and expanded.
B 23. Section 2.5.1 In-water Placement at Bishop Bar, RM 118 - This very brief description does not provide an adequate description of how the Bishop Bar site was evaluated. There is no explanation of what effect raising the riverbed would have on the aquatic environment, so the reader has no idea if this is a positive or a negative effect. The 2014 404(b)(1) provided some history of the Snake River habitat described how that habitat had been altered by the reservoirs, and explained how the Corps' proposed in-water disposal at the Knoxway Canyon bench would mimic some of the aquatic habitat that was lost. This current 404(b)(1) provides no information on why the Corps is proposing to use Bishop Bar instead of just dumping the dredged material at the deep water site at RM 119. The descriptions of the Bishop	There is no longer a Section 2.5.1 but rather Section 2.5 contains all of the pertinent information as to why Bishop Bar is the Preferred Disposal Alternative.

Bar and RM 119 sites do not clearly show that the use of one site has more adverse effects to the aquatic environment than the use of the other site, or that one site would have more beneficial effects to the aquatic environment than the other site. This does not provide a justification for the Corps' selection of the Bishop Bar site as the LEDPA/preferred alternative and therefore does not meet the requirements of the Section 404(b)(1) guidelines.	
B 24. Section 3.2.1 Water Chemistry - This paragraph should mention the dredged materials were screened for selected chemicals following the 2018 Dredged Material Evaluation and Disposal Procedures and the 2018 Sediment Evaluation Framework for the Pacific Northwest guidelines.	Concur. Information added.
B 25. Section 3.3.4 Action Taken to Minimize Impacts, last bullet - The bullet states that material discharged would be used to create mid-depth habitat. This information should be included in the site description in Section 2.3.2.1. In-water Placement at Bishop Bar, RM 118.	Concur. The information is also included in Section 2.3.2.1.

B 26. Section 3.6.2 Determination of Compliance with Applicable Water Quality Standards - This section should address how the Port of Lewiston is addressing compliance with Sections 401 and 404 of the Clean Water Act as the dredged material from the Port of Lewiston would be placed in-water in the state of Washington. The Port should be obtaining Section 401 water quality certification from Washington Department of Ecology for the in-water placement of its dredged material in the state of Washington.	Non concur. The Port of Lewiston was not required to obtain Section 401 water quality certification from the Department of Ecology in Washington. They did receive Section 401 water quality certification from the Idaho Department of Environmental Quality and that information has been added.
B 27. Section 3.6.3 Potential Effects of Human Use Characteristic, fifth paragraph - This paragraph states that recreational facilities such as boat ramps are not present at the proposed discharge site at RM 118. However, Blyton Landing boat ramp is about a mile upstream of the Bishop Bar site and is on the same side of the river (right bank) as the disposal site. The text should be revised to reflect the proximity of this recreation site.	Concur. Blyton Landing boat ramp information has been added.

B 28. Section 4.2 Evaluation of Availability of Practicable Alternatives to the Proposed Discharge Site Which Would Have Less Adverse Impact on the Aquatic Ecosystem - The first sentence says the habitat value at the proposed disposal site would be improved, but the description of the Bishop Bar disposal site use in Section 2.3.2.1 does not include any information on how the site would be improved and Section 2.5.1 does not provide enough information or analysis. The last sentence states the Corps determined the proposed placement at RM 118 minimizes adverse effects to the aquatic environment while providing greater benefits, but the description in this 404(b)(1) of the use of the Bishop Bar site does not show that, either. The description of the use of this site (Section 2.3.2.1) and the evaluation/selection analysis (Section 2.5.1) need to be revised to provide a justification for the statement that the habitat value would be improved.	The sections in question have been revised and expanded as suggested.
B 29. Section 4.8 Appropriate and Practicable Steps Taken to Minimize Potential Adverse Impacts of the Discharge on the Aquatic Ecosystem, fifth bullet – This bullet says that the dredging at the Snake/Clearwater Rivers confluence would be sequenced and that the coarser sand from the Clearwater would be dredged last and used to cover all of the exposed surfaces of the disposed material. However, this is the first time this feature is mentioned. It does not appear in any of the descriptions of the proposed disposal action at Bishop Bar. If this is actually going to	Concur. Text revised as suggested.

be part of the disposal, it should be included in the site description and the applicable factual determinations.	
FONSI 1. First paragraph – In addition to mentioning the dredging of sediment from the federal navigation channel, the FONSI should mention the ancillary/related dredging of the port berthing areas and access channels as they are also part of the Corps’ proposed action.	Concur. The dredging action at the ports is now included.
FONSI 2. Second paragraph – It is not clear what information this paragraph is trying to convey. The first sentence implies the channel is only at the four sites it lists, but these are really the four sites to be dredged and not four sites where the channel is located. It is also not clear what is meant by “channel”. The EA mentions the federal channel, and some of these locations are part of the federal channel, but the Port berthing areas are not. The rest of the paragraph seems to be combining several concepts. The first seems to be that the EA is incorporated by reference into the FONSI. The other is the EA is tiered from the Lower Snake River Programmatic Sediment Management Plan, Final Environmental Impact Statement (and the sentence should use the full title of the document). These two chunks of information do	The Corps has added clarifying language regarding the full title of the ‘Lower Snake River’ PSMP FEIS. The second paragraph appropriately describes the applicable navigation channel authorities.

not seem to be related. Suggest revising the paragraph to express a cohesive thought.	
FONSI 3. Third paragraph – A sentence should be added that states sediment deposition has reduced the depth of the channel and is impeding navigation. That would quickly address the need for the proposed action.	The first paragraph establishes that sediment has accumulated. The third paragraph describes the purpose and need but has been edited to repeat the sediment accumulation interference with navigation.
FONSI 4. Fourth paragraph – In the first sentence, change “no action plan” to “No Action Alternative. The Corps did not evaluate a no action plan in the EA. In the second sentence, spell out Clean Water Act as CWA is not defined. Change the last sentence, replace the word “option” with “measure” as the PSMP identified measures to address problem sediment, not options. In first bullet of criteria, change “and/or” to just “and” as the disposal site(s) must meet the disposal needs for both the Corps and the Ports, not the Corps or the Ports. Also, delete the word “basic” as that term is not used in the EA or the Clean Water Act Section 404(b)(!) evaluation.	Minor editorial changes have been made for clarity.

FONSI 5 - The table of resources and effects should have a label to identify what information it is illustrating and it should be referenced in the text. The table does not match the content of the EA. The EA does not state that mitigation is needed to render any of the effects insignificant. This table is misleading and makes it look as if the EA identified significant effects, which it did not. Suggest deleting the last column in the table (Resource unaffected by action) as no resources fall within this column. Better yet, just delete the table and insert a short paragraph summarizing the effects. That approach would be less confusing and would be consistent with the EA. The same comment applies to the Rivers and Harbors Act Compliance. The text is a repeat of Section 5.2.3. However, the text in this section should just address coordination and consultation.	Minor edits have been made to enhance clarity.
FONSI 6 - The fifth paragraph mentions compensatory mitigation several times, but no mitigation of any kind is mentioned in the EA because none was applicable or needed. To be consistent with the EA, references to unneeded and non-existent mitigation should be deleted.	The paragraph following the table states appropriately that "no compensatory mitigation is required".
FONSI 7. Sixth paragraph – This paragraph should indicate what year the Corps anticipates receiving the biological opinions.	Prior to finalizing a FONSI, this paragraph will be updated to reflect the final outcome of ESA consultation.

FONSI 8 . Eighth paragraph – In the first sentence, delete the reference to fill material as the Corps is not proposing to place fill material in-water, just dredged material. Unless the 404(b)(1) evaluation is revised to include sufficient information to describe the placement of dredged material at the Bishop Bar site and justify the Corps’ selection of that alternative as the proposed action and the LEDPA, this FONSI cannot state that the proposed discharge of dredged material complies with the 404(b)(1) guidelines.	Minor edits have been made to the FONSI for clarity. The 404(b)(1) Evaluation has been modified to fully state why disposal at Bishop Bar is the LEDPA.
FONSI 9. Ninth paragraph - The description of the permitting for the Port berthing area dredging is not quite accurate. The Ports have requested that dredging of their respective berthing areas be included in the Corps dredging contract, and the Corps has agreed to include the Port dredging in the contract with the Ports funding that portion of the contract. However, it is the Corps that is requiring the Ports to obtain their own permits for the dredging and disposal of their berthing areas instead of the Corps including the Port areas in the Corps NEPA and Clean Water Act compliance documentation for the dredging and disposal, as was the Corps normal practice prior to the 2014 dredging. The last sentence states the Port of Lewiston is not required to obtain Section 401 water quality certification, but that statement does not seem to be correct. The Port plans to dispose of its dredged material in-water in Washington, so the Port should be obtaining Section 401 water quality	The Corps (Civil Works Division) does not require permits of the Ports but cannot accommodate the Ports’ cooperation with the Corps dredging contractor unless the Ports are able to meet their individual permitting requirements. The Corps seeks to cooperate with the Ports as reasonable to align environmental permitting analyses and processes. The Port of Lewiston was NOT required to obtain Clean Water Act Section 401 water quality certification from Washington Department of Ecology. The Port of Lewiston did request and obtain Section 401 water quality certification from the Idaho Department of Environmental Quality.

certification for that action from Washington Department of Ecology.	
FONSI 10. Tenth paragraph – In the second sentence, change from passive to active voice to make this less awkward and much easier to understand. Change it to say “because the Corps prepared a Section 404(b)(10) evaluation and because it issued a Public Notice that provided an opportunity for interested parties to review and comment on the proposed action, the Corps has met the requirements of RHA Section 10.”	The Corps has edited this paragraph for clarity.
FONSI 11. Next to last paragraph – The intent of this paragraph is not clear. The paragraph provides a detailed summary of the scoping comments, but in the last sentence is a statement about the dates of the 30-day public review of the EA and draft FONSI, which is not related to the scoping comments. This should be two paragraphs – one for scoping and one for the public review of the documentation.	The purpose of this paragraph is to summarize comments received, both from scoping and from the public comment period of the draft FONSI and EA. There is no need for two paragraphs to describe these comments as the reader is referred to the attachment which provides details.

FONSI 12. Last paragraph – The first sentence states that all local government plans were considered in the evaluation of the alternatives, but the EA does not mention local government plans. Suggest deleting the reference to local government plans.	The Corps has this paragraph edited for clarity.
No comments	Thank you for your review of the documents.
Letter of support	Thank you for your comments.