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Via email to: <ConditDam@ECY.WA.GOV>

COMMENTS ON CONDIT DAM REMOVAL DRAFT SEPA SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

The White Salmon Conservation League ("WSCL") hereby files Comments on the Condit Dam Removal Draft SEPA Supplemental Environmental Impact Statement (DSEIS). Please provide any public notices regarding these issues to:

White Salmon Conservation League, 41 Private Lake Rd., White Salmon, WA 98672.

I. Comments Overview.

As an initial matter, WSCL refers the Department of Ecology ("Ecology") to WSCL's Comments submitted as part of the scoping process for this SEIS, and dated November 20, 2001 ("2001 Comments"). Many of the WSCL's 2001 Comments were either ignored or inadequately addressed by the DSEIS. The WSCL's 2001 Comments are therefore resubmitted and incorporated by this reference as part of our Comments on the DSEIS.

Additionally, WSCL refers Ecology to Comments by the Northwestern Lake Development Homeowners' Association dated March 20, 2002 that were originally submitted to FERC as Comments on FERC's Draft SFEIS, and also submitted to Ecology on June 9, 2002 as

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Scoping comments were used to identify issues that may be appropriate for the EIS. In the case of a supplemental EIS, the scope is necessarily narrower than the original EIS, and issues addressed in the original may not be issues of focus in the supplement.

Comments on PacifiCorp's Application for Water Quality Certification ('Homeowners' Comments'). The Homeowners' Comments addressed impacts to local private residential water wells and were likewise ignored or not inadequately addressed by the DSEIS and are therefore resubmitted and incorporated by this reference as part of WSCL Comments on the DSEIS.

While the DSEIS provides some of the much needed additional analysis of the PacifiCorp dam removal plan, it does not go far enough. As noted above, and indicated by the following comments, the WSCL does not believe that the DSEIS adequately addresses all of the adverse effects of the proposed dam removal.

II. Concrete Disposal Impacts.

PacifiCorp proposes to dispose of concrete from the dam by either burying it in a location close to the White Salmon River or by hauling it to a recycle facility. The DSEIS fails to adequately address the adverse effects of burying the concrete near the river. It is highly likely that contaminants from the concrete will leach, over an extended period of time, into both the river, and into the groundwater. The DSEIS concludes that leaching is unlikely to affect the City of White Salmon's well because of its depth. However, the DSEIS fails to consider impacts to local residential wells, many of which are quite shallow. Additionally, the DSEIS does not adequately address the impacts of long term leaching to the White Salmon River. Given Ecology's many water quality responsibilities, it seems inconceivable that the DSEIS treats the burying of so much concrete near a Class A river as a reasonable possibility and gives it such cursory analysis.

With respect to transportation impacts, if concrete is hauled to a recycle facility or an appropriate disposal facility such as the Rabanco facility in eastern Klickitat County, there will be significant impacts on state and local roads. The DSEIS only addresses transportation impacts under the assumption that concrete will be buried locally. It is equally or more likely that the concrete will require long distance transportation, so the SEIS should address these impacts.

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Opinion acknowledged.

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The FSEIS includes a new mitigation measure in Section 4.2.3 that recommends monitoring shallow groundwater downgradient of the concrete disposal site in the event this disposal option is selected. In the event that groundwater quality standards were exceeded, additional measures (e.g., remediation) could be required by regulations such as the Model Toxics Control Act Cleanup Regulations (WAC 173-340).

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Impacts related to transportation of concrete for on-site disposal are discussed in Chapter 4.6.2 Impacts. The peak-hour LOS analysis determined that there would not be a significant impact to surrounding roads. A scenario for a recycling alternative has been developed and is included in Section 4.6.2 Impacts of the Final EIS.

III. Private Well Water Levels.

As described in the Homeowners' Comments referenced above, there is a possibility of significant adverse effects of the dam removal to the static water levels of private residential water wells in the project region. The DSEIS fails to acknowledge or address this issue and should be revised to do so. Simply because the Counties have not designated the area as a "Critical Aquifer Recharge" does not negate the potential adverse impacts to private wells and is an inadequate excuse to ignore the issue.

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This potential impact was considered in Section 4.9.2.2 of the FERC FSEIS. A well mitigation plan was included in Section 4.10.2 of the FERC FSEIS. As this issue was considered to have been adequately addressed by the FERC FSEIS, it was not considered as part of the SEPA SEIS.

IV. Sediment Flush Impacts.

The WSCL believes the impacts of sediment flushing and transport will be significantly more adverse than most of the DSEIS suggests. Some of the troubling issues in this regard are as follows:

-The DSEIS primarily relies on PacifiCorp's opinions and studies regarding these impacts.

-PacifiCorp's sediment transport projections are based on unproven theories. The projected timeframe for significant adverse effects from sediment transport has been increased from the initial projection of one year to three to five years. It is only reasonable to assume that the effects could last much longer. The DSEIS should address that possibility.

-The DSEIS accepts the opinions of PacifiCorp and various agency personnel, many of whom may have promoted the Settlement Agreement, that thermal refuge for endangered fish will not be lost below the dam. It seems obvious that much of the efficacy of the lower river's thermal refuge is derived from deep pools and their proximity to the Columbia. Both of these elements will be eliminated by sediment infilling. ESA listed fish will then not only have to travel further up the White Salmon river to find adequate thermal refuge pools, but they will be hindered by spikes in water turbidity for 3-5 years or longer. The DSEIS should be revised to include mor

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Opinions are acknowledged. While PacifiCorp was requested to provide a number of specific studies, Ecology's consultant conducted an independent review of each study and issue to determine the DSEIS analysis results and conclusions. In addition, mitigation measures have been included to minimize the duration of sediment impacts.

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There would be shifting of thermal refuge in the White Salmon River after dam removal. In other words, fish might use some areas differently soon after removal of the dam than they would some years later. It would be a dynamic situation. River temperatures below the dam site would be slightly cooler after dam removal, but the pools present in the White Salmon River below the dam are already sufficiently cool to provide thermal refuge from elevated water temperatures in the Bonneville pool. The statement that thermal refuge would change location is a reference to the fact that the conversion of the pool at the mouth of the White Salmon River to a stream channel (with additional spawning gravel area) would be initially replaced by river habitat above the dam, becoming available to anadromous salmonids. As the high energy of the steep-gradient river channel removes fines from the river channel presently buried by the reservoir and pools in the river below the dam that are partially filled by fines after dam breaching, additional thermal refuge habitat would become available to anadromous salmonids, far exceeding what is currently available.

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rigorous science on this issue.

-The DSEIS relies on one older sediment sample analysis of the reservoir sediments that was commissioned by PacifiCorp. A new sampling/analysis should be performed by an independent party.

V. Mitigation.

The DSEIS notes that several mitigation and management plans were submitted by PacifiCorp in 2004. Many of the DSEIS conclusions are based on these documents. It would have been helpful for this public comment period if Ecology had made these documents more generally available to the public by posting them on its website along with the DSEIS. In any case, the documents should now be so posted because they presumably contain performance criteria by which PacifiCorp's mitigation efforts will be evaluated by independent monitoring. [Note: In response to our admittedly late request, Ecology has provided access to the above documents; however, we still recommend that Ecology put all such documents on their website, so the public can easily find them in one place.]

While unable to comment extensively on the merits of the actual performance criteria, the WSCL applauds the existence of such criteria and independent monitoring. There is, however, one aspect of the mitigation plans that becomes immediately apparent as deficient – the revegetation plan. The areas that PacifiCorp has identified as "Preliminary Potential Revegetation Areas" are far too limited. At a minimum, seeding and monitoring/management should be anticipated for the entire reservoir perimeter. Of course, rock walls cannot be vegetated, but there will be significant amounts of exposed mud/sediment ("bathtub ring") around the entire lake. It would be completely irresponsible not to revegetate all exposed areas.

However, this raises the single greatest shortcoming of both the PacifiCorp dam removal plan and the DSEIS's analysis of the plan. After dam removal, once PacifiCorp's financial cap on mitigation expenses has been reached, it can walk away from further mitigation requirements,

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The Corps of Engineers determines the adequacy of the sampling plan, because they must approve unconfined disposal of sediments in the lower Columbia River system. The Corps has established specific protocols to be followed. The Corps, through e-mail communication to Todd Olson of PacifiCorp on October 16, 2006, has approved the sampling plan.

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Comment acknowledged.

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Opinion acknowledged.

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Opinion acknowledged. The concern is about risk of failure rather than impact.

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regardless of performance criteria. This a highly significant adverse impact that the DSEIS utterly fails to address. Moreover, it is a probable impact. As noted in the WSCL's 2001 Comments, it would be reasonable to budget \$5 million for adequate restoration and revegetation of the lake perimeter alone. It seems inconceivable that the adequate mitigation of all the adverse impacts from PacifiCorp's dam removal plan will be accomplished under the Settlement Agreement's revised cost cap. The DSEIS should be revised to reflect this possibility and to describe who would be responsible for mitigation expenses not covered by PacifiCorp.

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Opinion acknowledged.

VI. Conclusion.

While appreciative of some of Ecology's efforts in this DSEIS to better analyze PacifiCorp's dam removal proposal, WSCL believes this analysis can and should be improved.

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Sincerely,
John Graham, President
White Salmon Conservation League