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**Send Comments to:**

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Place  
Stamp  
Here

**CONDIT DAM  
REMOVAL  
PROJECT**

**OPEN HOUSE and  
PUBLIC MEETING**

October 25, 2005

**COMMENT FORM**

Please drop off at tonight's meeting or mail to Ecology

Please provide your comments below:

I support removal of Condit Dam. The environmental impact statement identifies issues which can be mitigated, and which are less severe than the adverse environmental impact that has and will continue to occur as a result of the dam's presence.

I11-1

I11-1  
Preference acknowledged.

Please return this form to the sign-in table or mail it to Ecology at the address on the reverse side.  
Thank you for your comments!

If you would like to be on this project mailing list, please provide your contact information below:

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Email: [ConditDam@ecy.wa.gov](mailto:ConditDam@ecy.wa.gov)

**CONDIT DAM  
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 15 W. Yakima Ave, Suite 200  
 Yakima, WA 98902-3452

Please provide your comments below:

With A project of this magnitude  
 I believe cost should be always  
 open ended. Do not cap Pacificorp's  
 spending amount to attain the end  
 of this project. I am all for this project  
 as long it is done right and to it's  
 completion without too much expense  
 to the local community. Nature  
 will recover if it is allowed too  
 please don't leave rebar and  
 things like that in the river. ie  
 the Klickitat is full of it. Thanks for  
 being done good stewards so far!!

I12-1

I12-1

Opinion acknowledged.

I12-2

I12-2

Comment acknowledged. Dam debris would be removed.

Please return this form to the sign-in table or mail it to Ecology at the address on the reverse side.

Thank you for your comments!

From: JayLetto@aol.com [mailto:JayLetto@aol.com]  
Posted At: Tuesday, November 15, 2005 2:58 PM  
Posted To: Condit Dam  
Conversation: Proposed Condit Dam Removal Project, FERC No 2342  
Subject: Proposed Condit Dam Removal Project, FERC No 2342

November 15, 2005

Mr. Derek Sandison

SEPA Responsible Official

Washington Department of Ecology

15 W Yakima Ave., Ste. 200

Yakima, WA 98902-3452

Re: Proposed Condit Dam Removal Project, FERC No 2342 Draft Supplemental EIS

Dear Mr. Sandison:

Thank you for the opportunity to comment. I have been a White Salmon resident for more than 13 years now, and have followed the Condit Dam removal issue closely since the first FERC relicensing hearing more than 10 years ago.

Allow me to state up front that I am an enthusiastic supporter of dam removal, and have been frustrated at the level of bureaucracy this issue has been through without resolution.

I also want to quickly put Condit Dam removal in some context. There is no doubt, of course, that in the short term harm will be done to some listed species while the sediment makes it way downriver. There is also no doubt that in the long term removal of the dam will benefit these same listed species.

The U.S. Fish and Wildlife Service and the National Marine Fisheries Service routinely issue "takes" for countless projects that will harm listed species in both the short term and long term. I.e., projects are routinely allowed that will not only bring about short-term harm to listed species, but that will also harm the long-term viability of the species.

Because "takes" are routinely allowed anyway, and because, with the case of Condit Dam removal, the short-term harm to listed species will easily be offset by the long-term benefits to these same species, this permitting process should be a no-brainer.

But, instead, here we are nearly 12 years after the original FERC relicensing hearing rehashing the same questions/arguments we've been doing for more than 10 years. I hope this WDOE permitting process will finally allow FERC to make its ruling, and finally allow the White Salmon River to be on its way to recovery nearly 90 years after fish passage was first blocked.

Here are my specific comments on the SEPA SEIS:

Section 1.6.3: Significant Unavoidable Adverse Impacts

I13-1  
Comments and preferences acknowledged.

I13-1

All references to "Northwestern Lake" should be changed to reflect the inaccuracy of this common name and add or replace it with the word, "reservoir".  
The water impounded by Condit dam is a reservoir and not a lake. This is important because the rhetoric of many of the arguments for preservation of a lake are spurious when regarded as a natural impoundment. In reality, reservoirs are temporary contrivances and eventually the 93 year old dam will be removed or fail in an uncontrolled way.

I13-2

The sum of sediments only increases by the years that the dam is left in place past the nearest opportunity for its removal. The final SEIS should address this fact in a more forthright way.

I13-3

Likewise, the adverse impact on wildlife is an eventuality that cannot be denied at some point. Postponement of potential adverse effects do not negate the eventuality. The nearer term of mitigation by action should be forwarded as a positive alternative to postponement of what is to come at an uncertain and perhaps accidental date at time of failure of the reinforced concrete structure.

I13-4

The final SEIS should be explicitly consistent in its language to direct the reader to realize that the environmental damage of removal is part and parcel of its original construction and not a temporally recent event to contemplate.  
The seemingly potential damage is actually kinetic in the time frame of hydro-electric dams.

I13-5

These comments above are made in a specific section, but the general changes I suggest should be made throughout the document.

#### Water Resources

In various places in the document, WDOE notes the turbidity and sediment transport that will occur as a result of dam removal. Geologically notable events on Mt. Adams that occur at about biannual intervals, such as land slides

I13-6

I13-2

Comment acknowledged. While technically correct, longstanding convention, including in maps and earlier documents, uses the term lake. It may also be true that a manmade structure may deteriorate and fail, given enough time and the right circumstances. When those things might occur is a matter of speculation.

I13-3

It is correct that additional sediment would be expected to collect behind the dam because sediment continues to enter the reservoir from up-stream. Calculations of the amount of sediment in the reservoir based on a 2006 bathymetric survey are very close (and slightly smaller) than the amount of sediment calculated in 1997. Therefore, the length of time before the reservoir would be effectively not a reservoir is uncertain. It is also not clear whether the power plant could be operated as a run-of-river facility, even with the reservoir full of sediment. If the dam continues to be deemed safe, a reason to remove the dam and release the sediment would have to come from some other process and would not be a certainty.

I13-4

One must acknowledge that if there was an accidental failure of the dam, there would be adverse consequences. It would be speculation to presume to predict when or under what circumstances such a failure might occur. It does seem likely that a planned and controlled removal of the dam would have fewer adverse consequences than an accidental failure.

I13-5

Comment acknowledged. Changes have been made in the FSEIS as appropriate (e.g., Chapter 3).

I13-6

As described in Section 4.2.2 Impacts, subsection Drain Tunnel Construction and Dam Removal, suspended sediment concentrations in the White Salmon River could briefly reach 250,000 parts per million (ppm). During the first day, while the reservoir is draining and soft sediments are sliding into the river, the average sediment concentrations could be 150,000 ppm.

like the recent collapse of the Castle above the Big Muddy Creek in the Klickitat drainage, have not been dampened as similar events in the White Salmon drainage as a result of the absorptive dynamics of the slack waters of the Condit

Reservoir. This is an unnatural condition that will be lost with dam removal. The DOE needs to evaluate and compare turbidity levels of the release of Condit Reservoir sediments relative to what can be expected from naturally occurring mountain events and also lahars such as the one entering the White Salmon at MP 17 on WA Hwy. 141, a few years ago.

Glacial silt from rivers such as the Klickitat and Hood River and during late summer high temperature days need to be quantified and brought into the relative perspective. A very high initial load of sediments entering the Columbia River at a selected time to miss fish migration should be better emphasized. In addition, WDOE should describe the probability and potential impacts of accidental breach of the Condit Dam in the event that it is not removed in a timely fashion.

#### Aquatic Resources

The SEIS asserts that "one year-class of chum salmon" will be lost due to high concentrations of suspended sediments and deposition, and that this impact will be long-term for at least 4-5 generation cycles for chum. This seemingly overstates the expected impact on chum. First, based on the fact that adult chum salmon return to the White Salmon River at various ages, as noted on p. 4.3-18 of the SEIS, an "entire year class" of chum will not be lost. Rather, only part of a year-class will be affected. A year-class generally refers to those juveniles that emerge from the gravel at the same time.

This important clarification should be made in the final SEIS. In addition, the adult chum salmon that will return to the White Salmon River, of which there are few, will return after the initial breaching. This later timing will result in lesser impacts on chum salmon from dam removal. The final SEIS

I13-6  
Continued

I13-7

I13-8

I13-9

I13-10

These suspended sediment concentrations are predicted to become episodic and fall off rapidly to about 3,000 ppm in the White Salmon River after 3 months and 200 ppm after 6 months.

The estimated suspended sediment concentrations in the White Salmon River immediately after dam breaching would be similar to concentrations measured in the Toutle River near Castle Rock, Washington in May 1980 after the eruption of Mount St. Helens. At gaging station 14242690 on the Toutle River, the U.S. Geological Survey (USGS) measured suspended sediments concentrations as high as 960,000 ppm in May 1980 (USGS 1980). By August 1980, concentrations of suspended sediment in the Toutle River had decreased at this station to 4,000 ppm. In subsequent measurements, turbidity spikes as high as 234,000 ppm were recorded in March 1982, but over time these spikes decreased and the suspended sediment levels began to stabilize. While the magnitude of the sediment released by the two events is very different, a similar pattern with respect to spikes in suspended sediment concentrations is expected. As the volume of sediment is much smaller, the magnitude and frequency of the spikes are expected decrease more rapidly on the White Salmon River than on the Toutle River.

The USGS also conducted a water quality study for the Skokomish, Nooksack and Green-Duwamish Rivers (Embrey and Frans 2003), which drain into Puget Sound. Under high flow conditions in these rivers, maximum suspended sediment concentrations ranged from 787 to 3,210 ppm. This range of suspended sediment concentrations is similar to the predicted concentrations in the White Salmon River 3 to 6 months after the dam is breached. The relatively high levels of suspended sediments are typically related to high flow, and as the streamflow is reduced, the levels decrease to more typical levels, with median values ranging from approximately 25 to 70 ppm.

I13-7

How local events derived from Mt. Adams may compare is not known, but could be reasonably assumed to be within the range described above. Pulses of sediment in the White Salmon River as a result of such events would not be trapped by the reservoir after dam removal.

## I13-8

It would be speculation to presume to predict when or under what circumstances such a failure might occur. It does seem likely that a planned and controlled removal of the dam would have fewer adverse consequences than an accidental failure.

## I13-9

The FSEIS provides further clarification. Only two chum salmon have been documented in the White Salmon River in recent years, and there is no evidence that spawning is occurring in the White Salmon River. However, the statement that “one year-class of chum salmon” would be lost is accurate. A year-class describes the salmon smolts produced during a single reproductive season. Adult chum salmon spawners returning in a single year represent several year-classes.

## I13-10

The statement that “one year-class of chum salmon” would be lost is accurate. The statement in the DSEIS concerning the long-term impact was that “at least several 4- to 5-year generation cycles for Chinook and chum salmon” would be affected, not 4 to 5 generation cycles. Section 4.3 of the DSEIS also stated that variation in age-at-return would allow a lost year-class to rebuild over several generations. Depending on the salmon stock, the majority of returning adults from a given year-class of fry would likely have a dominant age-at-return. If the dominant age-at-return is 4 years (the general case for chum salmon), with a subdominant age-at-return of 3 or 5 years, then 4 years after the loss of a year-class the run would be composed primarily of 3- and 5-year-old fish from the previous and subsequent year-classes (and hence, greatly reduced). An unusually high survival of 3- and 5-year-old return adults would speed recovery, while a low survival rate and small return of 3- and 5-year returning adults would lead to a slow recovery. Because of this, it is impossible to predict how many generation cycles would be required for a complete recovery, but it would likely be several generation cycles before recovery is complete.

In the case of chum salmon, the number of spawning adults is very low and likely represents strays from a population below Bonneville Dam that

should discuss both factors. It should also better clarify the potential impacts to 4-5 generation cycles of chum salmon. As WDOE is probably aware, this has been interpreted to mean that the sediment could "wipe out a population of endangered chum salmon for as long as four or five generations." The SEIS should provide greater clarification to prevent future misunderstandings.

I13-10  
Continued

have the potential of eventually recolonizing the White Salmon River basin and establishing a viable population. Section 4.3 of the FSEIS has been changed to reflect this fact to avoid overstating the expected impact on chum salmon. It also acknowledges that NMFS (2006) Biological Opinion permits the incidental take.

Also with regard to chum, the document notes that spawning substrate will be impaired during the second year after removal. While this is likely accurate, it should also be noted that additional habitat above the dam will be available by that time. The final SEIS should more adequately account for the significant additional spawning habitat that will be available to chum salmon.

I13-11

I13-11  
Chum salmon have less capacity to leap water falls and generally do not migrate as far upstream as Chinook, coho, or sockeye salmon and steelhead trout, particularly in higher gradient rivers with frequent falls, such as the White Salmon River (Johnson et al. 1997). Reiser et al. (2006) set the maximum jumping height of chum salmon as 4 feet. The fall at RM 2.6 on the mainstem of the White Salmon and other falls on the mainstem may be barriers to the upstream migration of chum salmon adult spawners. Because chum salmon characteristically utilize the lower reaches of high-gradient streams, they may not be able to access this habitat, and additional year-classes may be affected until clean spawning gravels are formed in the lower couple of miles of river channel. The documentation of two adult chum salmon is not evidence that chum salmon are reproducing in the White Salmon River at the present time, but represents the potential for eventual recolonization of the river if suitable spawning habitat is available. The long-term effect of dam removal would be an improvement of spawning conditions for chum salmon, but it is not known at this time if chum salmon would be able to utilize additional habitat above the dam.

The SEIS finds that displacement of fish in the Bonneville Pool during dam removal would likely result in a "take" under the Endangered Species Act, however, it does not provide the basis for why displacement would constitute a take. Since Endangered Species Act determinations are to be made by NOAA Fisheries Service and the U.S. Fish & Wildlife Service, we urge WDOE to refrain from making any legal conclusions in its environmental analysis document. If this passage is left intact in the SEIS, WDOE should explain the basis of its assumptions that the fish will be displaced at all, as well as why its legal opinion is valid or warranted.

I13-12

I13-12  
Comment acknowledged. Short-term increases in turbidity within the Bonneville pool after the removal of Condit Dam would likely cause avoidance behavior and "displacement" of some fish in the Bonneville pool. These fish would not be displaced from the Bonneville pool, but would seek out areas of the pool with lower turbidity. Korstrom and Birtwell (2006), found that the ability of sediment-exposed Chinook salmon to escape to cover was impaired and that there was a significant increase in stuporous behavior and a significant reduction in cover-seeking response in sediment-exposed fish. They concluded that exposure to elevated levels of suspended sediment could indirectly jeopardize

Table 1.1.

On p. 1-17, the table states that with regard to sediment transport, the "longer the high concentrations continue, the longer or more difficult it will be for recolonization of the lost species." The White Salmon is a stopover for migrating anadromous fish, because it provides cold water respite. The impression of impact on a presently non-existent population of fish races that were lost at the time of construction in 1912 should be eliminated. The final SEIS should more accurately state the impacts

I13-13

survival in the wild, as such overt performance and behavioral changes would probably render juvenile Chinook salmon more conspicuous and therefore more susceptible to avian and aquatic predators. NOAA has considered this a “take” (NMFS 2006). The sentence regarding “take” has been modified.

#### I13-13

The Endangered Species Act mandates the recovery of listed species, including Distinct Populations Segments (in the case of steelhead and bull trout) and Evolutionarily Significant Units (in the case of salmon). In the case of anadromous species where much breeding and rearing habitat has been rendered inaccessible by the creation of man-made barriers such as dams or culverts, removing a species from the threatened or endangered list requires ensuring that adequate viable populations exist to reduce the chance of extinction or extirpation by recovering historical habitat. The FSEIS is required to accurately state the impacts to all listed species within the action area, which includes the watershed above the dam. This includes habitat essential to maintain functions necessary to maintain all life stages of a listed species, which in some cases can include non-fish-bearing streams that deliver large woody debris, nutrients, and water to fish-bearing streams. The recovery of historical habitat is a goal of salmon recovery plans and must be addressed in the SEIS, especially when the stated goal of the action is the recovery of historically accessible habitat to listed salmonids in the White Salmon River basin.

to the limited spawning species in the three miles of the slack waters between the dam and confluence and only to those species that are known to reproduce here. Cage-reared steelhead should not be considered as a lost resource without also calculating the high factorial gain in liberated up-river habitat.

I13-13  
Continued

The discussion of aesthetic and scenic resources, notes that new recreational opportunities would help mitigate loss of aesthetic/scenic resources. (SEIS, p. 1-21). I disagree strongly with the notion that aesthetics will be harmed by this action. Indeed, I believe just the opposite, that is, that the ugly scenic eyesores will be removed and replaced with a free-running, salmon-bearing, crystal-clear river. I don't even understand the DOE's aesthetic arguments here. Also, it's not clear how additional recreational opportunities will provide the mitigation, or what mitigation is even being considered here. I recommend deleting this in the final SEIS.

I13-14

### Section 2.3: Need for State Environmental Review

There is no doubt, whatsoever, that the greatest adverse environmental impacts would occur if the non-removal (temporary) "no action" alternative were chosen. Countless biologists and federal and state agencies and environmental groups all agree on this. Again, this should be an absolute no-brainer. However, WDOE's draft SEIS appears to infer that "no action" does not have greater environmental impacts than dam removal. That is clearly not the case and should be stated so explicitly. As the FERC FSFEIS

I13-15

concluded, the dam removal alternative is the best alternative for the resources of the White Salmon River, period.

### Section 2.3.1: Issues Resolved

I agree with the resolution of Issue 4 regarding impacts on winter steelhead. However, for the reasons noted above with regard to chum salmon, I disagree with the assertion that an entire year-class of winter-run steelhead are expected to be lost as a result of turbidity levels during dam removal.

I13-16

I13-14

Aesthetics involves the perception of one's surroundings, which includes more than views. There would be a short-term significant unavoidable adverse impact to some residents living along the existing lake until the area transitions from a lake to a stream environment. Long term, there would be a significant unavoidable adverse impact to the aesthetic perceptions of residents who participate in recreational activities such as lake fishing and boating. However, the aesthetic perceptions associated with new recreational opportunities such as kayaking, white-water rafting, and stream fishing may help offset the effects.

I13-15

The SEPA DSEIS and FSEIS have adopted, as adequate for SEPA purposes, the treatment of the no action alternative as addressed in the FERC EISs. It is acknowledged that the ongoing impacts that resulted from the original construction of the Condit Dam could be greater than the impacts of removal of the dam.

I13-16

The entire year-class of age-0 (juveniles produced during the spring of the year of dam removal) winter-run steelhead are expected to be lost as a result of turbidity levels in the river associated with the proposed dam removal. This would substantially reduce the number of expected returning adult steelhead 4 years in the future, when the majority of the lost year-class of steelhead would have been expected to return. During that year, the return of winter-run steelhead would be primarily composed of 3-year-old steelhead and strays from other river basins. Returns of winter-run steelhead would likely be reduced every fourth year for several generation cycles. A portion of the previous year-class of steelhead juveniles (age-1 fish) would also be lost. Section 2.3.1 of the FSEIS has been clarified.

The SEIS appears to recognize that adult winter steelhead return during various years, thereby supporting the notion that an entire

year-class will not be lost. Assertions that entire year-classes of any salmon or steelhead species will be lost are overstatements of the expected impacts and should be modified accordingly.

Again, thank you for the opportunity to comment. I look forward to seeing the final EIS.

Sincerely,

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I13-16  
Continued