

RIVERS COUNCIL OF WASHINGTON
January 21, 1995

Lois Cashell, Secretary
Federal Energy Regulatory Commission
825 North Capitol Street, NE
Washington, D.C. 20426

RE: FERC Project No. 2493-006 (Snoqualmie Falls Hydroelectric Project)--
Application for a new License, Major Existing Project on the Snoqualmie River,
Washington. Comments of the Rivers Council of Washington on the Draft
Environmental Impact Statement of November 1994.

Dear Ms. Cashell:

Enclosed for filing in the above-referenced proceeding are the Rivers Council of
Washington's comments on the above Draft Environmental Impact Statement (DEIS).

The Rivers Council of Washington (hereinafter "RCW" or "Intervenor" is the
oldest state river conservation organization in the Pacific Northwest. Our
mission is to lead an expanding grassroots effort to preserve, enhance and
restore rivers and their watersheds in Washington for their natural,
recreational, and cultural values and support compatible efforts of other
organizations in the Pacific Northwest.

We are pleased submit the following comments on the Draft Environmental Impact
Statement (hereinafter DEIS) for the Snoqualmie Falls Hydroelectric Project and
look forward to working with FERC staff and others toward what is in the public
interest.

We reserve the right to add to these comments in the case that the deadline for
public comment is extended beyond January 23, 1995. RCW Board Member Randolph
Pierce was also able to attend and testify at the December 15, 1994 public
meeting hosted by FERC staff on the Snoqualmie Falls DEIS. We would like to
incorporate Mr. Pierce's testimony with these written comments. Mr. Pierce
notified us that 58 persons who had signed up to testify at the meeting were
unable to speak due for lack of time. This calls into question the legality of
the proceeding. The National Environmental Policy Act (NEPA) and accompanying
regulations require administering agencies to "make diligent efforts to involve
the public in preparing and implementing their NEPA procedures." 40 C.F.R.
1506.6(a).

FERC staff has had but two opportunities to hear oral comments from interested
members of the public on this complex issue. While some of these persons might
have been willing to send written comments, there are no doubt a number of
persons among the 58 who will be left unheard. We therefore concur with the
Snoqualmie Falls Preservation Project's and the Snoqualmie Tribe's requests for
an additional public meeting before the close of the public comment period on

this DEIS, as well as an extension of the comment deadline (currently January 23rd).

The balance of our comments at this time concern impacts of the proposed changes in the Snoqualmie Falls project on whitewater boaters. Other recreationists, including fishermen, can be adversely affected in similar ways by the proposed licensing -- a point which is reiterated below.

As we have noted in previous submissions to the Commission, the "Powerhouse Run" of the Snoqualmie River is an important classroom(1) and playground to many, including individual whitewater boaters, organizations representing whitewater boaters like the Washington Kayak Club; as well as businesses including Pacific Water Sports in Seatac, WA.

The Powerhouse Run to the Seattle metropolitan area is perhaps the only stretch accessible to boaters in the after work hours during the late Spring, the Summer, and early fall months. "Accessibility" is gauged here in three ways: 1) the location of the actual run; 2) the frequency of boatable water levels on the run; and 3) degree of difficulty of access to and from the river itself.

Only three whitewater runs are comparably located: the "Middle Middle" (Class III-IV) and the so-called "Lower Middle" or "Club Stretch" (Class I-II) of the Middle Fork of the Snoqualmie; and a Class III stretch of the North Fork of the Snoqualmie. Unfortunately, the length of each of these runs precludes many from using either stretch as an after work run.

Access to the North Fork of the Snoqualmie has also become rather expensive and time consuming due to Weyerhaeuser's new permit system.(2) By contrast, the Powerhouse Run is short enough to enable boaters to walk their equipment back to their cars at the put-in, thus avoiding the need to shuttle cars back and forth before the trip.

Furthermore, the Middle and North Forks of the Snoqualmie River still only run at boatable levels for a certain portion of each year -- generally from the first rain in November and then on and off until the late spring. The Powerhouse Run of the Snoqualmie River runs at boatable levels throughout most of the year.

Finally, one cannot compare the scenery between the Powerhouse run and the three runs mentioned above.(3) While the majority of the run lies below the bypass reach, boaters are able to witness the magnificence of the Falls from the bypass reach. When there is insufficient flow to run the bypass reach, boaters can still see the Falls from the river-left side of the River across from Plant 2. the alternate and most-widely used put in for the run. The final element of accessibility of a whitewater run is the character of the access to and from the River itself. Under current circumstances, the put-in for the Powerhouse Run (just below and just above Plant 2) is adequate. This may not remain the case once new construction starts on the project as proposed by Puget (and as recommended in the DEIS).

FERC staff acknowledges the possibility that construction activities might "temporarily restrict access to the Snoqualmie River." DEIS at 4-72. This occurrence would be of tremendous concern, not just to whitewater boaters but to the substantial number of members of the public who use this stretch of the Snoqualmie for other forms of primary contact recreation (e.g., fishing, swimming, inner tubing, picnicking, etc.). This is unacceptable, especially because neither Puget nor FERC staff defines the word "temporarily."

Furthermore, Puget's plan to extend the Plant 2 facility another 64 feet upstream will put a permanent halt to use of the boaters' and fishermen's put-in that lies just upstream of the present facility. As mitigation for this loss, Puget proposed (and FERC staff recommended provision of "a naturally landscaped, low-development, carry-in boater, river access point." DEIS at 4-55. The Rivers Council of Washington generally supports this recommendation, although we have a number of questions regarding timelines, degree of improvements, and others. We look forward to working with Puget and FERC staff to iron out the details.

Boater access to the Powerhouse Run may also be adversely affected in terms of safety at the put-in. Puget's proposed expansion would substantially reduce flows over Snoqualmie Falls. Even considering Puget's offer to increase the flow in the bypass reach to 300 cfs,(4) there will be a substantial increase in flows discharged from Plant 2 -- up 50 percent from current levels to 3,145 cfs.

As mentioned above, the Powerhouse Run is a popular classroom for novice boaters, some of whom have never been on a river before and many of whom have not mastered the eskimo roll or other self rescue techniques. If a novice should be overturned by abnormal currents, such as those created by the Plant 2 discharges, she will be forced to rely upon an instructor or another boater to right herself. If one is not available, she will be forced to encounter these abnormal currents as a swimmer. An increase in such dangers will lead many instructors to choose another put in on the river. Such an outcome would be most unfortunate, as use of alternate access points would cause significant and unnecessary degradation of riparian lands in the area. It might also lead to an increase in trespass on privately-owned parcels downstream.

The large number of fishermen who wade in and cast their lines (or float tube) immediately below Plant 2 will be faced with these same dangers.(5)

In light of the above, the Rivers Council of Washington also cannot support the significant expansion of the project proposed by the applicant without guarantees that access to and recreational opportunities on the Snoqualmie River below the project will not be adversely affected. Such a guarantee has not been afforded under the FERC staff's analysis and recommendations in the DEIS in contravention of the Federal Power Act and the Electric Consumer's Protection Act. We trust this will be remedied in the Final EIS and look forward to assisting FERC and Puget in bringing this about.

Thank you for your attention and please contact me should you have any questions concerning our comments.

Sincerely,
Brooke M. Drury
Board Member/Volunteer Hydropower Coordinator

Footnotes

- (1) The author has personally observed organized outings and whitewater classes on this stretch on numerous occasions.
- (2) The North Fork of the Snoqualmie is also close to Seattle. Unfortunately, boaters who wish to access this Class II-III run must pay \$50 for an annual permit. To the author's knowledge, boaters must still carry their equipment up a one mile road through clear cuts to their cars. This adds significant time to the run, requiring boaters to leave earlier or choose another destination for lack of time.
- (3) The Rivers Council of Washington supports an increase of flows going over Snoqualmie Falls from the current minimum of 100 cfs year round. Directors, members, and staff cannot support the flow regime described in Option C (as recommended by FERC) at this time, however. The methodology of Option C (based on a percentage of average annual flow over the Falls) is intriguing, and we would not be adverse to a similarly-calculated flow regime with higher minimum instream flow amounts year round.
- (4) The Rivers Council of Washington is still unable to determine whether 300 cfs is an adequate flow to permit boating in the bypass reach. We thus reserve judgment on whether or not we support the proposal.
- (5) Fishermen frequent this area due to the fact that anadromous and other fish are attracted to the discharges from Plant 2.

FERC Staff Responses as recorded in the Final EIS, September 1996

paragraph 1-4: No response required.

paragraph 4-5: The public comment period was extended and two more public meetings were held.

paragraph 6-12: Construction under Minor Upgrade, the preferred alternative in the FEIS, is not expected to significantly restrict boater access to the river and our recommendation to improve the put-in at Plant 2 would enhance future boater access at the project.

paragraph 13: It is likely that river access would be limited only part of the time during the 5 month period from August through December when the Plant 2 bypass system would be constructed.

paragraph 14-17: In the FEIS we no longer recommend that Puget expand Plant 2 or substantially increase flows through it.

paragraph 18: Our preferred alternative in the FEIS would not significantly expand the project and there is no evidence that the project would have long-term adverse effects on river access and recreation opportunities below the project.

paragraph 19: No response required.