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Impacts on Logging caused by Dam:

Ecology has deemed there would be no significant environmental impacts on transportation caused by dam construction or dam operation (Appendix K, Section 3.2.4.3, page 87.) This statement will mislead decision makers. The impacts are huge to anyone familiar with forest roads and Weyerhaeuser operations south of Pe Ell.

Weyerhaeuser Road 1000 is the main haul line for miles of Weyerhaeuser logging upstream from the project site. Construction and operation of the dam will interrupt those operations and cause Weyerhaeuser millions of dollars if mitigation is not done.

Road 1000 crosses the Panesko tree farm at the project site. The Panesko family has co-operated with Weyerhaeuser to ensure safe and as efficient operations as possible for over 80 years. Ecology and the FCZD need to demonstrate the same co-operation for the next 80 years because Weyerhaeuser is a major economic engine for western Lewis County.

The first step that Ecology needs to add to Appendix K is mitigating the impact of the dam on the Weyerhaeuser road into the project site. Road 1000 needs to be widened so that trucks can drive into the project site without impeding Weyerhauser logging trucks coming downriver past the project site. The road needs to be wide enough that the blind corners are safe for wide loads in both directions. While the FCZD's 2024 technical memorandum on access roads makes a general statement about widening roads, there is no commitment to widen Road 1000 to the project site. Decision makers need to know that specific commitment will be made, not with a vague general statement.

The second step for Ecology to make in improving the draft EIS is to provide a clear commitment of the FCZD to build a Road 1000 bypass around the project site so that dam construction can proceed with no impact on Weyerhaeuser truck traffic. Due to the difficult terrain around the construction site, this by-pass will be an expensive mitigation which should be clearly stated in the draft EIS to satisfy decision makers.

The third step for Ecology is to require a new mainline Road 1000 be built around the reservoir footprint so that Weyerhaeuser operations can continue unabated when the reservoir is full. This action would replace the current FCZD plan to make Weyerhaeuser use one-way mountaintop, fire protection roads when the reservoir is full and 5 to 6 miles of the mainline Road 1000 is under 100 to 200 feet of water. After the reservoir is drained, the FCZD plan would be for Weyerhaeuser to return to a saturated, water-damaged, debris-covered Road 1000 along the Chehalis river.

The FCZD plan for mitigation does not make economical sense for the following reasons. The authors of the draft EIS need to have experience with maintaining forest roads to understand these reasons.

1. The network of mountain top fire-protection roads was not designed for every-day, heavy mainline use. It would require Weyerhaeuser to spend millions of dollars to upgrade miles of those

roads for daily use. Those roads are one-way, curvy, sometimes muddy, dangerous, mountain-top roads subject to frequent landslides which limit logging trucks to crawl at speeds of 5 to 10 miles per hour, not 25 to 35 miles per hour on the more straight sections of the mainline Road 1000 along the river.

2. Even after millions of dollars are spent on widening and improving the road bed of those fire-protection, high-mountain roads, those roads would add up to one hour or more of travel for each trip out of the woods causing millions of dollars of extra expense for Weyerhaeuser operations. That would be 2 additional hours for each round trip in and out of the woods.

3. After the 100 to 200 feet of water is drained from the saturated mainline Road 1000, the damage would require millions of dollars of landslide removal and a new rock bed, every 5 years or so. While the FCZD (the applicant) claims that by replacing the flooded portion of Road 1000 with a stone layer prior to the first flooding, the FCZD did not provide any evidence that such a design could withstand the pressure of 200 feet of water.

Apparently the FCZD has forgotten how 4 or 5 feet of water over I-5 near the Hiway 6 overpass tore up the asphalt on I-5 in a flood after being underwater for 2 to 3 days. Imagine the pressure of 200 feet of water over a dirt-based road layered with small stone blocks. While the FCZD proposed mitigation seems interesting, the fact is that all the soil under and around the roadbed will be saturated and unstable....no matter what kind of surface layer is placed on Road 1000.

4. After a flood event, it would take weeks or months and hundreds of thousands of dollars to remove landslides and flood debris from the saturated Road 1000. A bulldozer would rip up the protective cover in the process which would dramatically increase the cost of rebuilding Road 1000 after every flood event. The authors of the draft EIS likely have no technical experience to understand how expensive it will be to rebuild Road 1000 after every flood event.

5. Back to item #2. Even if a protective cover over Road 1000 could withstand 200 feet of pressure for 30 days, and withstand a bulldozer scraping away landslide debris and flood debris, Road 1000 will not be available in 30 days after every flood event. It may take a month or more to remove debris from 6 miles of soggy, mud-covered, debris-covered roadway. That doubles the added cost of Weyerhaeuser operations being forced to use backroads as mainline roads.

6. The common mantra of the FCZD is that Road 1000 would only be flooded once every 7 years. This FCZD claim is not supported by historical data which shows that if a dam had been in place 35 years ago, there would have been 7 floods which would have filled the reservoir. In addition, there would have been 10 additional flood events when the floodgates were left open (because Grand Mound flowrates remained under 38,800cfs) and water accumulated in the reservoir, flooding the lower Road 1000. In other words, in the past 35 years, Road 1000 would have been flooded 17 times or on average once every 2 years. Nobody seems to realize that. Nobody has taken a hard look at the historical data.

7. There is one last topic for decision makers to consider. The dam was built with an expandable feature to accommodate a larger dam in the future. The larger dam would have a permanent reservoir which would require building a permanent mainline Road 1000 around the edge of the reservoir. While that will be expensive because of new concrete trestles and bridges, why not build that edge road now when it will be cheaper than 20-30 years from now? That could save

considerable millions of dollars.

DECISION MAKERS NEED TO SEE THE ABOVE DISCUSSION IN THE DRAFT EIS TO BE ABLE TO MAKE SOUND DECISIONS BASED ON FACTS, NOT VAGUE HOPES.

AND IF ECOLOGY WANTS TO CORRECTLY INFORM DECISION MAKERS, ECOLOGY NEEDS TO HIRE STAFF OR CONSULTANTS WITH EXPERIENCE OF BUILDING AND MAINTAINING FOREST ROADS WHICH HAVE BEEN DAMAGED BY FLOODS.

I hope that this discussion helps Ecology to change their mind about the impact of the dam having no significant impact on transportation issues in the woods south of Pe Ell.