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My comments relate to the role of the proposed levee improvement project in the document and in the subsequent decision-making that the document is intended to support.

The proposed levee improvements should not be treated as necessarily linked to the proposed dam. The two projects analyzed in the document are wildly divergent in likely impacts. The "probable significant adverse impacts" descriptions are dominated by discussion of the dam; in contrast, improvements to the levee have a very minor role in the discussion of likely impacts.

Because of this, it is vital that the document support consideration of the levee project as a stand-alone measure to reduce flood damage. One is a rather modest, practical and affordable project to reduce flood damage in a built-up area. The other is a highly problematic idea of radically impacting habitat in an important habitat area with virtually no existing development.

The document identifies that the levee improvements would have a minor impact in slightly increasing flood elevations in a localized area, by reducing the effective floodplain area. Impact to structures can readily be mitigated through elevation and other floodproofing. The document appears to highlight the dam as a means to mitigate the localized impact of the levee improvements. It is vital that the document clearly identify these much more cost effective and likely means to mitigate the localized impacts of the levee work. To fail to do this would be an immense disservice to the subsequent discussions and decisions that the EIS will support.

A specific comment on water quality: I did not see identification of the water quality benefits of reducing flooding in the urbanized area protected by the proposed levee improvements. Flooding urban areas carries multiple contaminants into downstream flood waters from current and legacy urban land uses. These include contaminants with documented impact on salmon (such as those coming from tires) and persistent contaminants from current and legacy land use. The levee improvements would reduce the contamination that is an inevitable result of flooding urbanized areas. This should be included in the document. (I apologize if this is already included in this very extensive set of documents.)

Thank you for the opportunity to comment.