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TOPIC: REVISION 1 of previous comment, DISPOSAL OF OVERBURDEN EXCAVATED FROM DAM SITE

The 2020 EIS for the previous dam site stated that 900,000 to 1,200,000 cubic yards (CY) of overburden would have to be excavated from the proposed site of dam construction. The plan was to dispose of overburden on my property just upstream in the footprint of the dam reservoir.

The new dam design and location will require approximately 2,400,000 CY of overburden to be removed. Since the dam has been moved upstream over the previous disposal site, a new disposal site has to be selected.

The current draft EIS does not identify that new location but strongly suggests the location will be within the reservoir footprint.

WAC 222-24-060(2) "Location of Spoil Disposal Areas," forbids spoils from being deposited in any location where they would be subject to water leaching. Therefore, disposal of overburden inside of the reservoir footprint would be strictly forbidden.

This fact should have been reflected in Ecology's 2020 EIS. It was not. Ecology can now correct that previous error by referring to the WAC 222-24-060 regulations for spoil disposal areas in the current draft EIS.

Due to the steep terrain south of the project site, there are no flat disposal sites south of the dam. The 2,400,000 CY of overburden from the project site will have to be transported north out of the rugged forest terrain onto the flat Pe Ell prairie.

Truck trips to move 2,400,000 CY of overburden were calculated as follows:

Assume a 10-yard truck with a 10-yard trailer. That is 20 yards per trip.

240,000 CY divided by 20 yards = 12,000 truck trips through the residential section of Pe Ell before dam construction can begin.

If site preparation could be accomplished in 4 weeks (20 days), that would generate 600 trips through Pe Ell per day. If site prep takes two months or 40 days, that would generate 300 truck trips per day through Pe Ell. This environmental impact needs to be added to the draft EIS to accurately inform decision makers of the impacts of the dam on local transportation.

In addition to environmental impacts to Pe Ell, the following must be addressed in the draft EIS:

1. Environmental impacts of purchasing and maintaining a spoils disposal site on the Pe Ell prairie.
2. The cost of 120,000 trips to the disposal site. That would be a short trip costing approximately \$200 per trip which would add roughly \$24 million to the dam construction cost.
3. Creating an overburden disposal site according to WAC 222-24-060 regulations would have to be regulated for decades.

Here are corrected numbers for possible spoil areas.

1 acre = 43560 square feet. If 1 foot of overburden is placed over that 1 acre, there would create 43,560 cubic feet of overburden. Since there are 27 cubic feet per cubic yard, that would create 1,613 cubic yards for every 1 acre 1 foot high.

The math equation is  $(1,613 \text{ CY/acre}) \times (\text{acres of site}) \times (\text{height of fill}) = 240,000 \text{ total CY}$ .

The height of fill =  $240,000 \text{ CY} / (1,613 \text{ CY/ac}) \times (\text{acres of site})$ .

100 acres = 1.5 feet of fill.

50 acres = 3 feet of fill.

30 acres = 5 feet of fill.

10 acres = 15 feet of fill.

The above analysis and comments should be added to the draft EIS to better inform decision makers of the environmental impacts of removing overburden from the project site.

Please discard my original comment sent on Disposal of Overburden sent to Ecology on 1/30/2026.