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TOPIC: DISPOSAL OF OVERBURDEN EXCAVATED FROM DAM SITE

The 2020 EIS for the old dam site stated that 900,000 to 1,200,000 cubic yards (CY) of top soil/rocks (called overburden) would have to be excavated to before a new dam could be constructed. The new dam design and location will require approximately 2,400,000 CY of overburden to be removed (if you add up the various estimates of soil and fractured rock removal).

Using 10-yard dump trucks, that would require 240,000 trips to carry the overburden away. If the trucks had a 10-yard trailer, that would require only 120,000 trips.

It is no wonder that the dam designers want to make the trips as short as possible and dump all this overburden as close to the construction site as possible. Since this is mountainous terrain, the closest flat spots are adjacent to the river upstream from the dam. The downstream river is in a deep canyon all the way to the north edge of Pe Ell.

The FCZD (applicant) wants to save money by dumping the overburden on flat spots as close as possible to the construction site within the footprint of the reservoir. This is an environmental disaster since each filling of the reservoir will be saturating the fill and eroding sediment into the river.

In 2014 I logged some timber on my property where the proposed dam would be located. DNR would not allow logging close to any small creek flowing into the Chehalis river because of the possibility that a tiny bit of sediment might be moved into the river by these creeks. If Washington State prevents me from logging my own timber over small sediment concerns, why shouldn't Washington State (Ecology) be strongly against placing leachable fill in locations subject to winter storms and high water erosion where tons of sediment would reach the river?

Why should private landowners be forced to follow one law while the FCZD can turn around and freely violate that law? Ecology should not allow any overburden to be placed where the extreme forces of the raging river can chew into that fill. I have watched the raging river during winter storms chew into two areas of my property. I have lost over 100 feet of 30-foot high river bank over the past 80 years.

There is another aspect of overburden disposal which has been completely ignored by Ecology. Let me explain. The draft EIS sets aside about 30-55 acres in the reservoir for disposal of 2,400,000 CY of overburden. What does that look like?

10 acres (7.5 football fields) the fill would be 153 feet high.
20 acres (15 football fields) = the fill would be 74 feet high.
30 acres (23 football fields) = the fill would be 51 feet high.
40 acres (40 football fields) = the fill would be 38 feet high.
50 acres (50 football fields) = the fill would be 31 feet high.

First point: There are not 23 football fields of flat space near the dam site. If there were, the fill would be 51 feet straight up on the edges. Since the edges have to be tapered, that means more than

23 football fields would be required.

Second point: The closest flat spots to the dam are north onto pastures owned by people living on the edge of Pe Ell. Any fill 30 feet and higher will have significant long term environmental impacts which will have to be addressed in this draft EIS. The big question: How do you control erosion into nearby creeks from heavy rainfall?

Third point: The truck traffic of 120,000 truck trips into the Pe Ell area from the dam site will cause congestion not addressed in the draft EIS, unless a new road system is created. The draft EIS speaks out of both sides of its mouth by first stating the existing road system will be used, and later, that an entirely new road system will be necessary. The draft EIS needed to explain which new roads (and costs) need to be built to handle movement of overburden. These new road systems need to be built before a shovelful of dirt is moved at the dam site.

Fourth point: The FCZD does not want to pay for the following:

1. Purchasing flat fields in Pe Ell.
2. Paying for 120,000 truck trips from the dam site under construction.
3. Paying for long term environmental protection practices on the fill.

And Ecology goes along in the draft EIS and states that mitigation might be economically unfeasible. That is an outrage. If the dam and all the mitigation of the environmental impacts are economically unfeasible, then you don't build the dam. You cannot ignore mitigation and just build a dam.

You must first revisit those alternatives (which Ecology deemed economically unfeasible) and update them....to pick one which is now feasible. If all choices are economically unfeasible, you do nothing.

This draft EIS suffers from so much uncertainty that any rational agency would postpone the EIS until all the mitigation steps are on the table and their environmental impacts documented. The uncertainty associated with most of the environmental impacts is unacceptable at this point. This draft EIS is premature and should be postponed.

And the draft EIS should clearly state that Ecology will not allow overburden to be deposited within the reservoir footprint.

This might be the time to remind Decision makers that water will be in the reservoir about every two years, not the 7-yr average stated by the FCZD. And those times where water accumulates behind the dam when the gates are open, there is an uncontrolled drawdown which is responsible for serious erosion.