

August 4, 2009

City of Spokane
Planning Services Department
Attn: Leroy Eadie
808 W. Spokane Falls Blvd.
Spokane, WA 99201

Subject: Spokane River Whitewater Park EIS Scoping comments

Dear Mr. Eadie:

The Spokane Falls Chapter of Trout Unlimited (SFTU) herewith submits, for your consideration, our Scoping comments for the study (EIS) you are requiring on the environmental impacts of the propose whitewater park. Trout Unlimited is a national conservation organization that has worked for the past 50 years toward our mission “To conserve, protect and restore North America’s coldwater fisheries and their watersheds”. It is therefore, appropriate that our comments be viewed as credible and worthy of serious consideration.

We insist that the findings of your mandated EIS be held to the highest standards of scientific analysis and comply with those standards set by Washington State law (WAC 197-11-400 and WAC 197-11-402).

We incorporate by reference our comments previously submitted in response to the SEPA checklist. In addition, these comments will reference American Whitewater: <http://www.americanwhitewater.org/content/Wiki/stewardship> an organization that we believe, through their Whitewater Parks Policy Statement, agrees with SFTU that the proposed site is not an appropriate location. In part, that statement says, “It is our policy that natural un-modified river channels should not be modified for the creation of whitewater parks.”

Although the study needs to assess the impact of the park on all aquatic life forms, SFTU is primarily concerned with the welfare of the wild Redband trout that are known to spend their entire lifecycle in the proximity of the proposed park. Our comments will generally be directed to the issues of spawning habitat, fish passage, in-river and riparian habitat, construction techniques and maintenance.

Spawning Habitat:

SFTU recognizes that locations of actual spawning areas are difficult to ascertain due to the Redband's nature to spawn during high spring flows. The required EIS needs to contain a comprehensive study, based on the best available science, on the importance of the project area for Redband trout spawning and establish an estimated use of the area for spawning. If the park impacts spawning habitat, mitigation to those impacts needs to be a requirement of the permit, which could include enhancement to existing habitat, an artificial spawning channel or other means to offset the impacts.

Fish Passage:

SFTU recognizes that the design of the park has been modified to maintain what has been called the "north channel" for fish passage; however, we are not convinced that during extreme low flows that that channel can provide suitable fish passage. Based on the contours shown on the latest design drawings, it appears that the south channel, where the park is proposed, historically provided deeper water and better passage. The EIS needs to model the impact of flows that should be expected over the life of the park. If the EIS finds a negative impact on fish passage, follow American Whitewater's consideration 4a. "Stop, redesign/relocate park".

In-river and Riparian Habitat:

The EIS needs to comprehensively study the hydraulic continuity in the project area for the interaction between ground water and surface or river water. This seems to be of extreme importance when evaluating the proposed means and methods to de-water the work area during construction of the park.

In addition the EIS needs to evaluate the impacts to the natural channel, all aquatic life and river hydraulics by the proposed removal of the willow island directly upstream of the proposed park. The EIS process needs to assess the importance of the willow island as potential Redband spawning and rearing habitat. Reference American Whitewater's consideration 2a "Riverbed is in natural condition: Stop, relocate park".

The EIS needs to examine how Redband trout utilize the site of the proposed park. Currently the site provides excellent recreational angling indicating that it is important habitat for trout through the summer and fall at precisely the time when the park will be most actively used. American Whitewater consideration 5a says "Negative impact on existing recreation: Stop, redesign/relocated park".

The disruption of the riparian zone to create a footpath to the park needs careful study. This area has been negatively impacted by previous uses and construction, and a reliable plan for stabilization and restoration of native plants needs to be part of the EIS.

Construction Techniques:

SFTU understands that the design of the proposed park includes the requirement that the construction site be de-watered in at least two phases. The schematic “Typical De-watering Plan” included in the current design has no relationship to the proposed site or to the conditions of the river bottom. As we have previously stated the EIS needs to assess the interaction of ground and surface water to facilitate the design of a proper method of de-watering. SFTU has great concern that relying on a contractor to successfully design and de-water the site could lead to disastrous results. Attempting and failing to de-water the site could lead to abandonment of the project and leave the river in a much worse condition. The EIS needs to include verifiable engineering that demonstrates that means and methods of de-watering are attainable and affordable. That engineering also needs to address the reclamation requirements to restore the river channel once the de-watering is complete.

The current plans call for the removal of the 3 historic bridge piers. Relying on a contractor to develop the means and methods could lead to undesirable outcomes. Strict engineering guidelines need to be submitted controlling the type of demolition activities that will be allowed.

It is our understanding that in excess of 200 cubic yards of concrete grout will be placed in constructing the proposed park. Uncured concrete and/or the slurry from grouting are known to be toxic to all aquatic life. Again, strict control guidelines need to be included in the EIS to assure that there will be no exposure of uncured grout to the river water.

Maintenance and operation:

The EIS should include an assessment of the risk of partial or full failure of the structure and include contingency or mitigation plans in the event of a failure. A long-term commitment should be required as a part of the EIS for the maintenance and repairs to the park as well as the surrounding upland areas. That commitment needs to express both the intent to follow up operational needs and recognition of the financial obligation to see that the intent is fulfilled. American Whitewater consideration 9a, “No or inadequate operation and maintenance commitment: Stop, secure commitment”.

Mr. Leroy Eadie

The large log that is currently lodged into the rocks and bridge pier exactly where the park is proposed represents proof of the risk that the park will need on-going maintenance.

Thank you for considering our Scoping comments. It is unfortunate that a better evaluation of the suitability of the proposed site wasn't done at an earlier date. A full set of alternative sites should have been studied and publically vetted so that the public could understand how this site was chosen and why other sites were not appropriate. SFTU would likely have offered our endorsement to other sites on the river that aren't managed as wild trout habitat.

Sincerely,

Harvey Morrison, President
Spokane Falls Chapter of Trout Unlimited