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american whitewater affiliation

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December 22, 1994

Ms. Sarah Bransom
National Park Service
Western Team
12795 Alameda Parkway
Denver, CO 80225-0287

RE: Elwha River Ecosystem Restoration Draft Environmental Impact
Statement

Dear Ms. Bransom:

The American Whitewater Affiliation (AWA) appreciates the opportunity to comment on the Elwha River Ecosystem Restoration Draft Environmental Impact Statement (DEIS).

The American Whitewater Affiliation (AWA) is a national organization with a membership of over 3800 individual whitewater boating enthusiasts and more than 100 local canoe club affiliates, representing approximately 30,000 whitewater paddlers. AWA was established in 1957. Our mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely.

AWA has enjoyed a long history of involvement with dam operations and their affects on river systems. We are one of the founding members of the National Hydropower Reform Coalition, which consists of over 25 national, regional and local river organizations now working with the Federal Energy Regulatory Commission (FERC) on the relicensing of non-federal hydroelectric projects.

AWA believes that removal of the Elwha and Glines Canyon dams is important both as: 1) a benefit to restoring the Elwha, and 2) a much needed national policy regarding future dam removals.

1) RESTORATION OF THE ELWHA

As described in the DEIS, Public Law 102-495, the Elwha Restoration Act was implemented "To restore Olympic National Park and the Elwha River ecosystem and fisheries in the state of Washington." The U.S. Department of the Interior (DOI) proposes to "fully restore the Elwha River ecosystem and native anadromous fisheries."

The only way to "fully" restore the Elwha ecosystem, is through removal of both projects.

Anadromous Fisheries

Dramatic declines in aquatic species is an indication that the ecological health of our nation's rivers is waning. In 1990 a study by The Nature Conservancy concluded that one third of all native freshwater fish species and one fifth of all freshwater invertebrates in the U.S. were threatened. No where has this decline been harder felt, or recognized, than in the Pacific Northwest.

Among all development threats to natural rivers, hydropower dams rank at the very top. The natural flow of a river -- the volume of water and pattern of high and low flows -- is vital to a river's health. The flow regulates water temperatures, transports sediments and organic nutrients, dilutes contaminants, and triggers fish behaviors ranging from hunting to reproduction.

Without free-flowing passage and adequate flows, the system begins to break down.

This is the case on the Elwha. Besides restricting natural river and sediment flow patterns, these two dams have changed water temperature and pre-project river levels. The non-existence of fish passage has removed fully 9 of the 10 native species of salmon and trout from some 70 miles of the Elwha River and useable tributaries.

The combination of removed species and reduced habitat makes it impossible to fully restore the Elwha's fishery with less than total removal of both projects.

Recreation

Humans rely on rivers too. Rivers offer recreation and respite for wilderness adventurers and city dwellers alike. Scenic waterfalls, roaring rapids, and quiet, meandering streams are at the heart of the nation's most spectacular landscapes.

The Elwha represents one of these spectacular river landscapes, and has been recognized for its outstanding qualities again and

again.¹ While removal of these two dams will not produce a new whitewater run, it will expand and combine existing runs on one of the most beautiful river canyons in the nation.

The AWA Nationwide Whitewater Inventory² (attached) lists three separate whitewater segments on the Elwha, over 18 miles of class II - V rapids. The upper section, the "Grand Canyon of the Elwha" which begins after an eight mile hike from Whiskey Bend was described as follows in A Paddler's Guide to the Olympic Peninsula:

This run is so special it goes beyond words. The whitewater...the canyons...the wildlife...the riverside camping...-- it's the Elwha!³

The middle section, from Glines Canyon Dam to Lake Aldwell, and the lower section below this lake are equally beautiful but less challenging whitewater resources. As mentioned in the DEIS, removal of both dams would add another 5.3 miles of river. Perhaps more importantly, a continuous 23 mile Elwha river could be enjoyed by all of those seeking a truly wilderness river experience.

The DEIS found that removing both dams on the Elwha "would also have positive impacts on socioeconomic growth, renewed interest in cultural resources, recreation opportunities, and esthetics." However, the final EIS should more fully explore the potential economic growth for local communities if recreation use (boating, fishing, hiking, sightseeing, etc.) is permanently protected and expanded by dam removal.

For instance, whitewater boating (a combination of private and commercial interests but described only as "rafting" in the DEIS) is currently one of the fastest growing sports in the nation, and has experienced a 33% nationwide increase since 1988⁴.

Whitewater recreation often offers startling economic benefits,

¹ In 1938, Congress established the Olympic National Park. In 1976 the park was designated an International Biosphere Reserve, and in 1981 was named a World Heritage Site.

² American Whitewater Affiliation, 1990, Nationwide Whitewater Inventory: A Geographic Information System for Whitewater Rivers in the United States. Pope Barrow, ed.

³ A Paddler's Guide to the Olympic Peninsula. Gary Korb, 1992, page 31.

⁴ CANOE Magazine report, 1988.

and has provided a positive revenue for many states.⁵

2) NATIONAL POLICY ON DAM REMOVAL

Some dams cause significant destruction of the ecosystem -- some are located on especially sensitive or outstanding rivers -- many produce such minimal power benefits⁶ that dam removal is the only reasonable solution. The Elwha fits into each of these categories.

The Elwha and Glines Canyon dams are not alone. Other dams, built around the same time as these two, are also candidates for removal because of age, safety concerns, and/or totally inefficient power production.⁷ Many of these dams are currently seeking new licenses before the Federal Energy Regulatory Commission (FERC).⁸ Dam removal on the Elwha could set national policy on when and how to remove other un-needed or un-wanted dams on other rivers across the country.

In addition to environmental, safety and energy conservation arguments for dam removal, private hydropower dams are facing the possibility of increased competition. Utilities will be seeking lower overhead, larger market share and more economical sources

⁵ The Gauley River (WV) provides in excess of \$30 million to the state for only six weekends of scheduled releases in the fall. The Penobscot River (ME) generates \$20 million annually, and the El Dorado County Board of Supervisors reports that whitewater recreation on the South Fork American (CA) produced \$30 million in revenue for the local economy in 1992.

⁶ Nationwide, hydroelectric power accounts for just 13% of the nation's energy generating capacity. The approximately 2,000 non-federal dams licensed by the Federal Energy Regulatory Commission (FERC) represent just over fifty percent of this hydro capacity, or 7% of the national power generation.

⁷ In 1993, FERC determined that dam removal must be studied as one option for Washington's White Salmon River. In June, 1994, FERC announced that it would consider dam removal as one alternative to relicensing Edwards dam on Maine's Kennebec River. Also in June, FERC approved a settlement between state and federal agencies and the Consumers Power Company; included in this settlement was \$750,000 for the removal of the Stronach Dam on Michigan's Pine River. This dam had stopped operation in 1952.

⁸ In 1993, 160 licenses affecting 237 dams on 105 rivers expired. These "Class of '93" licenses represent over ten percent of all FERC-licensed developments. Another 259 dam licenses will expire between 1994 and 2010.

of energy. This means that small marginally-economic dams, or older less efficient dams could be abandoned in large numbers in the future.

No policy exists for how or when to remove these dams. The hydroelectric industry is the only energy industry without such a policy. Mining and timber production, as well as industrial developments (such as nuclear power plants and solid-waste landfills) must plan, financially and otherwise, for the full life of the activity--including retirement of the facility after its useful life.

More importantly, no policy exists which determines who must pay for dam removal. So far, once private developers are finished making a profit from a public river resource (sometimes after more than a century of use), they have no responsibility to remove their dams. Historically, past dam removals have fallen to state agencies,⁹ or in the Elwha case, the DOI.

Under either scenario, the public pays.

CONCLUSION

We have learned something over the past century -- The water is renewable but the river is not! As a clean source of energy, hydropower is now understood to have an enormous environmental price-tag! And we have learned that once a dam is built, there is no effective way of fully restoring the river!

The Elwha represents our best opportunity to address many of these unanswered questions. The issue of who removes a dam? -- and more importantly, who pays? -- will not disappear if the Elwha dams remain on this outstanding river.

The AWA fully supports the removal of both Elwha and Glines Canyon Dams, the restoration of the historical fishery, and the increase of water-based, natural recreation and aesthetic opportunities within the Elwha watershed.

Thank you for this opportunity to comment on this DEIS.

Sincerely,

Richard J. Bowers
Conservation Program Director

⁹ The Michigan Dept. of Natural Resources has removed over a hundred small private dams.

Enclosure

**cc: Chair Elizabeth Moler, FERC
Honorable Bruce Babbitt, DOI
Hydropower Reform Coalition
Brooke Drury, AWA-WA
Carol Volk, ORC**