

March 1, 2007

Magalie Roman Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Comments on Draft Environmental Impact Statement, FERC #2545/12606

Dear Secretary Salas:

As FERC considers the relicensing of Avista Corporation's 5 Spokane River hydroelectric developments in Washington and Idaho, it is imperative to remember that the guidelines of the new license will govern management of the river for the next 30 to 50 years. As such, there are several concerns that should be considered prior to issuance of the new license.

Please consider the following concerns before a decision is made on the issuance of the license.

• **Post Falls Dam**

Post Falls Dam has long caused problems for the Spokane River and Coeur d'Alene Lake. This dam maintains Coeur d'Alene Lake at an artificially high level throughout the summer causing shoreline erosion, loss of wetlands and inundation of natural levees.

The dam also reduces the amount of water that flows into the Spokane River while maintaining levels in Coeur d'Alene Lake. The reduction in water flows to the Spokane River has effects on both fish and the Spokane Valley Rathdrum Prairie (SVRP) Aquifer. From the Post Falls dam to Barker Road, the water of the Spokane River helps recharge the SVRP aquifer. During low flows in summer, the aquifer drops significantly because there is not enough water in the river to recharge the aquifer.

This also causes problems for local fisheries. When the water flows in the Spokane River are low in the summer, fish suffer. The low water flows create stretches of river that are too shallow for fish to swim in. And the slow moving water can heat up to levels that are lethal to several native fish species.

By releasing 700 to 800 cubic feet of water per second, Avista can provide enough water to recharge the aquifer and safeguard local fish. This will also help lower the level of Coeur d'Alene lake to help restore wetlands and shorelines.

- **Spokane Falls**

The Spokane Falls have been a tourist destination in Spokane since the 1974 World's Fair. These thundering cascades surround River Front Park, the park created where the World's Fair was held. But every summer, Avista turns off these falls to divert all the water to a hydroelectric development for power production.

For nearly 3 months, during the peak of the tourist season, the Spokane Falls go silent. To date there has not been an economic analysis done to address the loss of these falls to businesses in downtown Spokane. There has also not been an economic analysis of tourism dollars lost because the Spokane Falls are not flowing.

Avista's own study has confirmed that people like seeing 500 cfs flowing through the falls. Avista has agreed to release 200 cfs and undertake extensive channel modifications to make the 200 cfs look similar to 500 cfs. However, if this work does not occur or the modifications do not meet the 500 cfs aesthetic look, then Avista should be required to release additional water until the 500 cfs look is attained.

- **Sedimentation**

Sedimentation has become a serious issue in the reservoirs created by Avista's dams. Specifically, two reservoirs below the Spokane Falls have been filling with sediment since the dams were constructed. Nine Mile reservoir is almost completely full of sediment, and in 50 years Lake Spokane will be nearly 20% full. Because of the dams, the natural flushing of this sediment has been stopped. These reservoirs can no longer support the vast number of fish that once lived in these areas because of the sediment damaging the habitat.

Along with the sediment, large quantities of agricultural fertilizers and herbicides have accumulated in the reservoirs. These pollutants have lead to excessive aquatic plant growth and blooms to toxic algae. Though not the exclusive responsibility of Avista, these pollutants would not be accumulating in the reservoirs if the dams were not in place, blocking the natural flushing of the rivers.

Avista must plan to remove the accumulated sediment that has settled in the reservoirs behind the dams. Avista must also develop and implement a long-term sediment management plan that will address sedimentation problems for the length of the new license.

- **Dissolved Oxygen**

Dissolved Oxygen in Long Lake declines every summer because of the amount of time water stays in the reservoir and because of specific operations at the dam. The dissolved oxygen in the reservoir decreases to a point where fish, plants and other aquatic organisms lose a majority of their habitat because dissolved oxygen is not available. This loss of dissolved oxygen can also result in fish, plant and aquatic organism die-offs.

Avista could greatly improve dissolved oxygen levels in Lake Spokane in two specific ways: by installing a device to directly add oxygen to the reservoir and by modifying Long Lake dam to re-aerate water as it flows through the dam to downstream reaches of the Spokane River.

An aeration device, specifically a Speece Cone, has been used in local reservoirs and lakes to compensate for extremely low dissolved oxygen levels. The use of this device in similar situations has resulted in a 90% increase in available habitat to fish and aquatic organisms and has increased dissolved oxygen from 1 milligram per liter to around 8 milligrams per liter. This increase would greatly benefit Long Lake as well as the Spokane River past Long Lake Dam. Also, direct modifications to the penstocks/intakes and water outlets of Long Lake Dam could greatly increase dissolved oxygen levels in the water that flows past the dam.

- **Total Dissolved Gas**

Total Dissolved Gas is a major problem at Long Lake Dam. This dam stands nearly 500 feet tall and causes significant amounts of gasses to be dissolved in water during spills over the spillway. These gasses quickly come out of suspension in the water below the dam, causing a condition similar to “the bends” in the fish in that area. This condition can result in large-scale fish kills in the area directly below the dam.

With simple modifications to the dam and by changing some operational management techniques, the total dissolved gas problem can be reduced or eliminated at this dam.

The relicensing process for these dams is well underway. And while it may cause additional time needed to address these problems, it is imperative that all concerns be

addressed during this relicensing process. The results of the license will dictate what will happen along the Spokane River for decades to come.

Enclosed you will find 3 reports commissioned by The Lands Council, Center for Justice and Sierra Club. These reports were based on scientific information gathered during the relicensing process and that is available in the Draft Environmental Impact Statement. Please consider these reports as part of the comments submitted by The Lands Council. We believe that these reports shed light on several critical questions regarding our concerns for relicensing Avista's dams.

In closing I want to thank you for the opportunity to comment on the Avista Relicensing Draft Environmental Impact Statement. I look forward to hearing how you will address these issues for the relicensing of these dams.

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