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March 30, 2024

Debbie-Anne A. Reese
Acting Secretary
Federal Energy Regulatory Commission
888 First Street NE
Room 1A
Washington, DC 20426

**Rock Island Project (P-943-144)**

Dear Ms. Reese,

The North Central Washington Audubon Society (NCWAS) is pleased to provide The Federal Energy Regulatory Commission (FERC) comments and recommendations as part of the ongoing public process for relicensing the Rock Island Hydroelectric Project (FERC Project 943). We appreciated the opportunity to discuss the Horan Natural Area and Rock Island ponds with FERC representatives in the field and at the evening scoping session hosted by FERC on March 13, 2024, in Wenatchee, WA.

The Project area includes the length of the Columbia River from Rock Island Dam to Rocky Reach Dam and extends for one mile up the Wenatchee River. The entire project area is included in the homeland of the p'squosa/Wenatchi people. Members of our Board of Directors have worked with the Public Utility District No. 1 of Chelan County (Chelan PUD) for several years to ensure that high value bird and mammal habitats are recognized and prioritized in the process. It is our hope that FERC will fully incorporate articles and requirements in future licenses to enhance and conserve the areas described below.

The extent of riparian and wetland habitats in Chelan and Douglas counties is limited and shrinking due to urban and agricultural expansion. The values of riparian and wetland habitats are well documented in scientific literature. NCWAS places a great emphasis on the protection, restoration, and conservation of wetland and riparian systems in the Rock Island Project area. The thin riparian zone associated with the length of the Columbia River and along the lower reach of the Wenatchee River in the Rock Island Project area provide a myriad of benefits to the recreational public and the animals that use the area for foraging, breeding, and protection. Urban encroachment and escalating public use within these areas point to the increasing importance to protect, restore, and enhance their ecological functions.

The NCWAS considers all riparian and wetland systems as critical and limited bird and mammal habitats. Two areas within the Rock Island Project area are of particular interest to NCWAS: the Rock Island Pond area and the Horan Natural Area (Wenatchee River Confluence South).

**The Rock Island Ponds**


*Figure 1. City of Rock Island and the Rock Island Ponds (Google Maps image)*

The Rock Island ponds (Figure 1) are recognized in the 1978 Exhibit R - Recreation Plan for the Rock Island Project. The ponds are not designated as one of the five FERC-approved recreation sites in the Rock Island Project area (PAD p. 5-245). The descriptive paragraph of the pond area in Exhibit R recognizes efforts by the Chelan PUD to improve water quality and control nuisance insects. Exhibit R states that the site has potential for increased public use as a wildlife observation area.

Exhibit R describes the pond area as a historic channel for the Columbia River. NCWAS believes that the ponds are connected hydrologically to the Columbia River. We believe that fluctuating river stages in the Columbia River due to operation of the hydroelectric facilities at Rock Island Dam influence the levels and character of the Rock Island Ponds, creating a nexus between them and project operations. As is the case for many resource questions and issues tied to the Rock Island Ponds, there is no known literature that describes this groundwater connection between the Columbia River and the Rock Island Ponds.

NCWAS, as part of the Chelan PUD's "early action" process conducted baseline bird surveys in the Rock Island Ponds area between November 2020 and October 2022. A total of 118 bird species were documented in the surveys. The surveys list an exceptionally high number of Wood Ducks, a species that is presented as a management priority for the Chelan PUD in the 1989 FERC license of the Rock Island Project (p. 18).

Two of the six lakes in the area present high potential for enhancement of bird habitat and recreational use: Big Bow Lake and Hideaway Lake. The Chelan PUD owns land under and adjacent to these two ponds (Douglas County public records). Recent discussions between the City of Rock Island, NCWAS, and

the Chelan PUD have led to an understanding about the value of managing these two ponds as nature reserves in the future. The Chelan PUD, while owning the land under the larger lakes, considers the Rock Island Pond area as an area that is not needed for Project purposes. The Chelan PUD states that without any license articles or other licensing requirements, they propose to remove the Rock Island Ponds area from the Rock Island Project Boundary (PAD, p. 6-16).

NCWAS believes that direct involvement of the Chelan PUD to enhance the ponds as nature reserves is important going forward. While new articles or license requirements for actions by the Chelan PUD to assume responsibility for enhancements in the area may not occur, the Chelan PUD stands to be recognized as a part of a valuable effort to enhance public use of the area if they continue to participate in the collaborative discussions with the City of Rock Island and NCWAS.

**The Wenatchee River Confluence South area (aka Horan Natural Area, HNA)**

The 1978 Exhibit R[1] identifies sixteen potential recreation sites within the Project area[2] , one of which is Wenatchee River Confluence South. Known locally as "the Horan", the area today is a remnant of the historic Wenatchee River delta. Figure 2 is a composite of two photos. Taken in 1930, the gray area extending into the Columbia River is now inundated and lost to today's visitors to the area. The color photo is a current satellite image (Bing, 2024) to illustrate the relatively small area that remains. While the gray delta area is no longer visible, it remains an important marker in the cultural history of the Wenatchee Valley. This photo, combining scenes nearly 100 years apart, reminds us of the significant habitat and cultural loss created by the Rock Island hydroelectric project.


*Figure 2. The Horan Natural Area (color) and the historic extent of the Wenatchee River delta that that is currently inundated by the Rock Island dam operating pool (gray, 1930)*

Exhibit R describes the Wenatchee River Confluence South area as

> *"contains extensive wetlands and riparian areas. Its function as a natural area should be preserved."* [3]
>
> *"…low, marshy and subject to periodic inundation. It has wetlands and riparian areas which are valuable habitats for waterfowl and other species."* [4]

[1] Public Utility District No. 1 Chelan County, Washington. February 1978.
[2] Exhibit R, p. 9
[3] Exhibit R, p. 10
[4] Exhibit R, p. 21

The Chelan PUD recognized the natural values of the Horan area and made plans to acquire the land.[5] Most of the area was purchased in 1987. [6]

> *"The plan proposes to acquire this site so as to preserve its function as a natural area, and also to allow for educational interpretation."*

The Chelan PUD describes management intent for the Wenatchee River Confluence South area as:

> *'At the South Confluence site, "natural" designation is recommended for the southeast tip of the site and its islands. The remaining part of the South Confluence is designated "conservancy", which permits a modest amount of development.' [7]*

Figure 3, a schematic map of the Wenatchee River Confluence South area, is excerpted from Exhibit R, plate 5. Of note in Figure 3 is the small area labeled "pond" immediately below the Wenatchee River and to the west of the Columbia River. This pond is also shown in Figure 4, an aerial photo of the area taken in 1964 prior to the historic flood of December 1964. The photo also clearly shows that riparian vegetation is confined to two areas: a channel area on the west side of the HNA and an area on the east within the Columbia River. Most of the area appears flat and does not show extensive shrubs or trees in the interior.

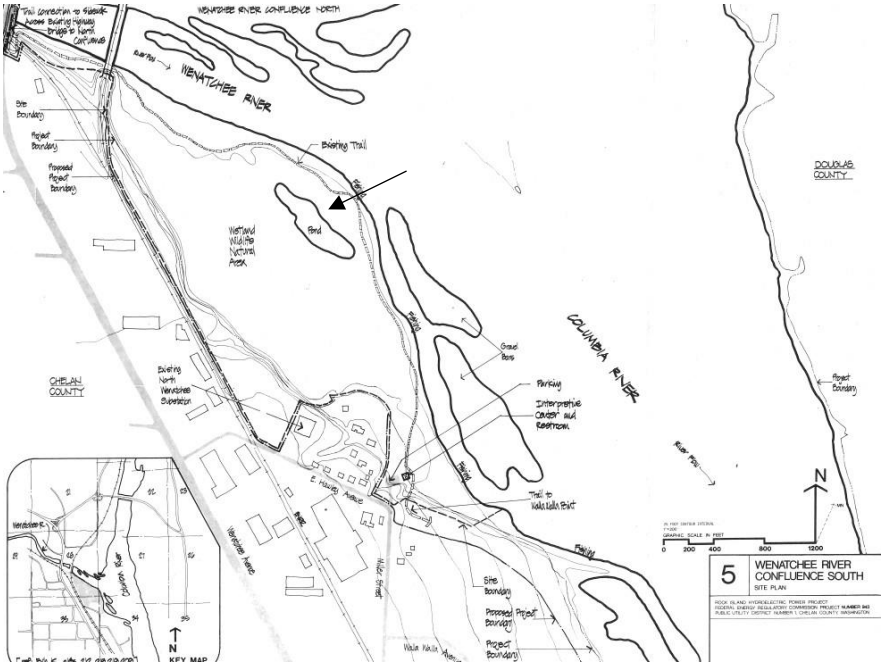



*Figure 3. Wenatchee River Confluence South. Exhibit R*

[5] Exhibit R, p. 21
[6] Chelan County records, GIS
[7] Exhibit R, p. 42


*Figure 4. 1964 aerial photo of the Wenatchee River Confluence South area*

Figure 5 shows the same area in 1991. After acquiring the land in the HNA in the late 1980's, the Chelan PUD made significant modifications to the area including constructing a trail from north to south along the entire length of the HNA. The Chelan PUD was required to locate and construct the trail in a manner that would be sensitive to the presence of Bald eagles along the eastern edge of the area. The Chelan PUD also constructed a pedestrian footbridge across the Wenatchee River to connect the Wenatchee River Confluence North and South areas.


*Figure 5. Wenatchee River Confluence South, 1991*

The most dramatic modification made to the area, however, was the construction of four ponds. Figure 6 shows the ponds as constructed by the Chelan PUD [8]. There is no indication in the FERC license for Project 943 or in Exhibit R that the ponds were a requirement. This was confirmed in personal communication with one of the PUD employees who participated in construction of the ponds. The ponds were located to take advantage of existing low spots or wetlands. A person involved in the pond construction states that they were constructed by "taking nothing out and bringing nothing in." [9] Materials were excavated to varying depths to intersect groundwater originating from the Wenatchee and Columbia Rivers. The ponds have steep sides to encourage use by muskrats and other burrowing mammals. The ponds were connected by culverts with a single culvert allowing Columbia River water to enter the area directly during periods of extreme high flows.


*Figure 6. Horan Natural Area pond, (Fletcher, 2016)*

Soon after the ponds were completed, the Pioneer Irrigation District constructed an "operational bypass" to direct water into the area. Water entered the Horan area using a cement box culvert under the railroad tracks. Storm drainage from the City of Wenatchee was also directed into the Horan using the same culvert under the railroad. Figure 7 is a photograph of one of the ponds. It shows the benefits that the ponded water provides. Cattails are established and a wide variety of birds began to use the area for nesting and foraging. Recreationists benefitted from the beauty the ponds created.

In 2005, the Chelan PUD asked the City of Wenatchee to cease putting storm water drainage into the Horan area. The City complied by disposing the water in an area near the Wenatchee River. In 2012 the Pioneer Irrigation District converted their open canal system to pipes to increase efficiency and to conserve water. The water that the Pioneer Irrigation District provided was most of the supply to the Horan. In aggregate, loss of stormwater drainage and irrigation bypass water resulted in the termination of surface water to the ponds in the Horan. The token amount of intermittent water that flows to the

[8] Justin Fletcher, Chelan PUD, Public Power Benefit – Recreation and Parks, Horan Wildlife Area Water Supply, Jan. 6, 2016

[9] Jim Pope, personal communication

area in Number One Canyon Creek is insufficient to provide meaningful water to the ponds. Today, the ponds are reverting to non-native and native vegetation. Their benefit to recreation and wildlife is substantially gone except when high groundwater levels occur over sufficient time to allow inflow through the pond perimeters.

*Figure 7. Horan Natural Area ca. 2003. Credit: Mark Oswood, NCWAS*

In 2016, the Chelan PUD published an analysis of possible water sources to be used in the Horan area[10]. The report concludes that well sources and diversions from the Wenatchee or Columbia Rivers are not viable. The report points to the use of water from Number One Canyon Creek and City of Wenatchee stormwater drainage. Neither of these sources can reliably provide the 500 -1000 gallons per minute that are needed to provide meaningful water to the Horan ponds.

Restoration of water to the Horan ponds is a priority for NCWAS. eBird documents 225 bird species at the Wenatchee Confluence SP/Horan Wildlife Area location. The area is used for many purposes: running, walking, birding, education, solitude. The Chelan PUD in 2019 held a community open house to solicit opinions about the Horan Natural Area. They received 198 responses about enhancement opportunities that were broken down into 4 categories: Water Resources (21%), Wildlife and habitat (19.2%), Recreation Improvements (40.1%) and Education and Cultural (19.8%).

NCWAS participated in the Chelan PUD's Recreation and Wildlife/Botany Technical Working Groups. The thrust of our participation was multi-faceted but building awareness of bird resources throughout the Rock Island Project area was key to our involvement. The benefits associated with returning water to the Horan ponds were stressed repeatedly. We anticipated that our thoughts would be carried forward in the Chelan PUD's Pre-application document (PAD). The results are mixed.

[10] Justin Fletcher, Chelan PUD, Public Power Benefit – Recreation and Parks, Horan Wildlife Area Water Supply, Jan. 6, 2016

The PAD contains a list of the diverse avian species found in the Rock Island Project area (section 5.4.2, p. 5-190-195). The Wenatchee Confluence State Park South *(sic)* is described in a very general way in the Recreation Resources section (5.6, p. 5.254). Interestingly, the description does not mention water, ponds, and does not include any sense of the degree to which people visit any of the developed recreation facilities within the Project area.

NCWAS has recently learned that the Chelan PUD does not discuss the Horan ponds in the PAD because "..we (Chelan PUD) don't get any credit for the ponds." [11] If the Chelan PUD does not disclose the character and value of the Horan ponds in the PAD, the FERC will remain uninformed about them and the Chelan PUD will not receive any "credit" from the FERC for the ponds. NCWAS believes that the ponds, like every other recreation investment made by the Chelan PUD in the Project area, should be disclosed. The PAD's recreation survey provides details about hard surface, developed recreation facilities such as parking lots, ball courts, and boat ramps. The recreation inventory does not include a description of the values associated with passive recreation (walking, birding, solitude) created by the ponds.

NCWAS is quite confident that the FERC representatives who participated in or led scoping activities in the area on March 13, 2024 gained a direct impression about how citizens and organizations in the Wenatchee Valley place high value on the Horan area and the need to re-water the Horan ponds.

The high habitat and social values of the Horan Natural Area were repeatedly mentioned in Technical Work Group (TWG) meetings. The TWG process led to generalized issue statements that obscure the details about, and importance of, water in the Horan. The PAD carries forward two issues that are central to the conditions in the Horan Natural Area. They are:

> *"Whether recreation use and capacity at facilities and amenities designated in Chelan County PUD's Recreation Plan for the Rock Island Project (i.e., Wenatchee Riverfront Park, Walla Walla Point Park, Kirby Billingsley Hydro Park, Wenatchee Confluence State Park, and Coyote Dunes Natural Area) meet current and anticipated needs at those sites."*
>
> *"Whether designated natural areas in Chelan County PUDs Recreation Plan (i.e., Coyote Dunes Natural Area and Horan Natural Area within the Wenatchee Confluence State Park) are managed to preserve their functions as natural areas."*

In the PAD, enhancement measures like "a Horan Natural Area outdoor education/classroom space" were shunted to a "Parking Lot" (PAD, Recreation TWG, p3) along with coordination with the City of Wenatchee regarding providing treated stormwater into the Horan Natural Area (PAD, Recreation TWG, p.4) for future consideration. Other important considerations such as bird habitat at Rock Island Ponds and Horan were itemized as Key Discussion Points (PAD, Wildlife TWG, p4) as part of TWG meeting notes. It is not clear where in the PAD or in future formal licensing process records these issues will be addressed.

[11] Matt Shales, Chelan PUD, personal communication, March 13, 2024

Lack of information in the PAD about the value of water in the Horan Natural Area ponds and the Chelan PUD's responsibility for the creation and maintenance of the ponds is disturbing. Article 412 of the 1989 FERC license for the Rock Island Project gives the Chelan PUD permission to construct or install certain projects that

> *are "…consistent with the purposes of protecting and enhancing the scenic, recreational, other environmental values of the project"*

without prior approval by the FERC Commission (License, Article 412a, p. 36). It is likely that this permission was used as the basis to create the ponds in the Horan Natural Area. Article 412b (page 37) to state that the uses and occupancies granted by the permission

> *"…are <u>maintained in good repair</u> and comply with applicable state and local health and safety requirements."* (emphasis added)

NCWAS continues to maintain that the ponds created by the Chelan PUD in the Horan Natural Area represent the greatest potential for meaningful enhancement of habitat, educational opportunities, and recreation experiences if water is returned to them. Returning water to the Horan ponds would be a socially significant "white hat" opportunity for the Chelan PUD.

Currently, the Chelan PUD is ignoring the public's desire to restore water to the ponds in the Horan Natural Area. The Chelan PUD is on record as relying solely on surface water input to the Horan area that is consistent with the local environment. They stated that they would likely reject any application to use irrigation water as a potential supply to the ponds. NCWAS believes that it is possible, legally, and physically, to bring water from the Highline Canal to the Horan ponds. The Chelan PUD's resistance to the use of irrigation water stems from the fact that previous irrigation supplies were curtailed, leaving the ponds dry.

Existing FERC documents for the Rock Island Hydroelectric Project support the intent of protecting and enhancing the Wenatchee River Confluence South area. Public support for education, environmental, and recreational use of the Horan area is well documented by the Chelan PUD. The Wenatchee Reclamation District is open to the idea of diverting irrigation water to the Horan if possible. The City of Wenatchee recognizes the value of water in the Horan and is striving to prepare stormwater for possible conveyance to the Horan. NCWAS believes that both the possibility of using irrigation water in the Horan and discussions about long-term agreements to satisfy the future need for water there are worth exploring.

NCWAS firmly believes that continued operation of the Rock Island Hydroelectric Project (P-943) will continue to influence terrestrial, aquatic, recreational, and cultural characteristics of the Horan Natural Area. The Horan is within the Project area and is identified as one of two Natural Areas in Exhibit R. Chelan PUD documents and testimony to FERC during project scoping on March 13, 2024, clearly show the high social and environmental value associated with having water in the ponds.

Groundwater levels in the area are connected to both Columbia and Wenatchee Rivers within the Project boundary. Groundwater is one source of water that can fill and maintain water levels in ponds created by the Chelan PUD in the Horan area. The degree to which groundwater contributes to surface water in the Horan ponds is unknown.

The PAD dismisses any PM&E (prevention, mitigation, enhancement) measures related to water resources. [12] The PAD also states that the Chelan PUD is not proposing any additional water resources studies. [13] The FERC Scoping Document 1 for the Rock Island Hydroelectric Project P-943-144 identifies two issues that encompasses re-introduction of water to the Horan Natural Area ponds:

1. Issue 4.2.2 (p. 15): Effects of continued pond operation and maintenance on riparian, littoral, and wetland habitat and associated wildlife.

2. Issue 4.2.4 (p. 15): Effects of continued project operation and maintenance on recreational use and experience in the project area, including the adequacy of existing recreation access, education and interpretive opportunities, and facilities in meeting current and anticipated needs.

FERC outlines specific study plan criteria (18 CFR Section 5.9(b) in Scoping Document 1, p. 28. Details for a proposed new study to evaluate the feasibility and benefits of returning water to the Horan ponds are attached to this letter.

The Horan Natural Area deserves the chance to become the world-class wildlife and recreational area it could be. This can only happen if the Chelan PUD relaxes its current position on water source availability and fully and transparently develops the idea of water re-introduction in the ensuing FERC licensing process. NCWAS believes that the FERC should install articles and requirements in any new license for the Rock Island Hydroelectric Project that direct or require the licensee to take the necessary actions to re-vitalize their original vision of the Horan when they built the ponds.

NCWAS will continue to work with the Chelan PUD and other partners to make the desired conditions in the Horan Natural Area and the Rock Island Ponds area realities.

[12] Chelan PUD, PAD, section 6, p 6-4
[13] Chelan PUD, PAD, section 6, p 6-5

# Requests for future studies

## 1. Request to study the feasibility of re-introducing irrigation water to the Horan ponds.

**Background**

The FERC asks for information that will assist them in conducting an accurate and thorough analysis of the project-specific and cumulative effects associated with licensing the Rock Island Project, P-943. The constructed ponds in the Horan area have direct, indirect, and cumulative environmental and social effects. These effects are short- and long-term and vary based on the amount of water that is resident in the ponds. Currently, the lack of water in the ponds directly and negatively affects recreational experience, riparian and wetland habitats, as well as natural fauna that use the area.

The Chelan PUD, originally responsible for the foresight and construction of ponds in the Horan, is currently restricting surface water inflow to the Horan ponds to that which occurs as part of groundwater fluctuation, during storms, or which enters the area as surface flow in Number One Canyon Creek during snowmelt periods. The PUD is currently not open to introduction of irrigation water to supply the ponds based on their desire to "..ensure the HNA functions in a manner consistent with our region's precipitation regime…"

Untreated irrigation water was the dominant historic surface water supply to the ponds after the Chelan PUD constructed them in 1990. The PUD, citing their experience with the termination of historic Pioneer Irrigation Company water to the area, does not consider the use of irrigation water, treated or otherwise, to be a possible source for the Horan ponds stating that they "..may ultimately decide against using it."

The study proposed here would provide a scientific analysis of the physical, legal, and social feasibility of providing irrigation water to the Horan via Number One Canyon Creek, a natural channel that flows directly to the Horan Natural Area. The study should include costs for water procurement and maintenance of the flow into the Horan Natural Area.

**Goals and objectives of the study; Information to be obtained**

The goal of the study is to determine if there is a way to deliver irrigation water to the Horan Natural Area ponds.

The study would provide:

- An assessment of the legality of diversion of water from the Highline irrigation canal for use in the Horan Ponds

- Information about possible construction and operation of physical diversion structures to put canal water into Number One Canyon Creek.
- Information about the extent to which adding irrigation water to Number One Canyon Creek would enhance the magnitude and severity of flooding during seasonal storm events.
- Information about private landowner sentiment about establishing intermittent flows through or adjacent to their properties during irrigation season.
- Information about channel and culvert capacities in the reach of Number One Canyon Creek between the Highline canal and the Horan Area

**Public interest considerations**

- Number One Canyon Creek has a history of flooding during intense summer thunderstorms. Attempts to mitigate the flooding have been installed above the proposed diversion site. Landowners along Number One Canyon Creek who have been affected by previous floods will likely be concerned about adding water to the channel during irrigation season.
- Members of the public have repeatedly voiced their support for re-introduction of water to the Horan ponds.
- If successful, the full ponds in the Horan area would enhance the quality of recreational visits to the area as well as ecological conditions associated with vibrant riparian and wetland habitats.

**Existing Information and the need for additional information**

- The NCWAS vision paper for the Horan Natural Area documents the need for, and benefit of, re-watering the Horan ponds.
- Very little information about the relationship between river levels, stormwater amounts or timing, and groundwater influence on the amount of water in the Horan ponds exists.
- The Chelan PUD installed piezometers on two ponds to record surface water fluctuations. The data has not been published. If groundwater is to be considered a primary source of water for the pond, the dynamics of groundwater exchange (timing, duration, extent) needs to be quantified.
- NCWAS prepared a geomorphic summary of the Wenatchee River delta over time. The study is available here and will be uploaded to the FERC eComment site. This study illustrates the inundation of the delta area resulting from Rock Island Dam hydroelectric operations. It also includes a discussion of the cultural history of the area and the water supply to the area.
- To be successful, the study should determine the degree of public acceptance or resistance to adding water to Number One Canyon Creek during irrigation season.

**Nexus between project operations and any direct, indirect, and cumulative effects**

- The Horan Natural Area is a remnant of the original Wenatchee River delta flowing into the Columbia River. Most of the original delta, and its associate indigenous homelands, is now inundated by the operating pool behind Rock Island Dam.
- Operation of the Rock Island hydroelectric facility results in extreme fluctuations of river levels in the vicinity or the Horan Natural Area.
- Fluctuating river levels directly affect the amount and extent of groundwater beneath the Horan Natural Area.
- River fluctuations influence the amount of groundwater available to the constructed ponds in the Horan Natural Area.
- The Horan ponds were constructed circa 1990 after Exhibit R and the 1989 FERC license for P-943 provided incentive to purchase the area and to enhance natural features in ways that are consistent with the area's natural functions.
- The constructed ponds are not considered as mitigation for habitat loss. Riparian and wetland habitats are given priority in language in the FERC license.
- The ponds, when full, have a direct effect on avian and mammal habitat, the quality of recreational experience, and social recognition of the area as a desired place to visit and enjoy.
- The ponds, when full, have a direct effect on bird and mammal species that utilize the area.
- The Horan Natural Area is recognized as a destination for people who enjoy birdwatching. Visitors from other states and countries are known to include a visit to Wenatchee and the Horan area to enjoy the diverse birds the area accommodates. The cumulative effect of visitors on the local economy is significant.

**How is the proposed study methodology consistent with accepted scientific practices.**

- It is proposed that this study of water availability be conducted by a professional engineering firm with the capability to address both the social and environmental aspects of the questions to be addressed.
- Competitive bidding should be the foundation for contractor screening and vetting.

**Cost and effort considerations**

- This proposal considers the use of a natural channel to deliver water from the Highline canal to the Horan area. Costs are expected to construct a diversion facility where the canal and the creek intersect. There will be a maintenance cost for this facility going forward. Such a diversion is well established in this area.
- There would be a cost to supply the water to the Horan. Payments to the Wenatchee Reclamation District would follow their fee schedule once the amount of water needed is determined.

- There would be a cost to open the channel that is currently plugged as the stream enters the Horan area on private land. This is not seen as a significant cost and could be considered as maintenance of the ditch that currently diverts water around the radio tower area. The private landowner is currently not agreeing to access to do any maintenance.
- There will be a cost associated with any grade establishment to provide gravity flow in the natural channels and connections between ponds. Since there are existing channels to and within the area, the cost of establishing a free-flowing channel to move water through the area is likely to be small.

## 2. Request for studies at Rock Island Ponds

**Background**

Lands underlying Big Bend and Hideaway Ponds were dry land when the Chelan County Public Utilities District (PUD) acquired them. They later filled with water due to raised levels of the Rock Island Dam Pool (RIDP), the PUD dredged them, and planted riparian habitat on their south side banks. Having purchased these lands, created the two ponds, and established the associated riparian plantings, NCWAS believes the Chelan PUD has a responsibility to maintain them and ensure they are environmentally healthy.

Other than rainwater and snow melt that finds its way to the ponds, there is no surface water inflow to or outflow from them. The water levels within them are, however, directly connected to ground water levels that fluctuate with RIDP levels resulting from operations of Rock Island Dam (RID). Consequently, any contaminants originating from septic tanks, pesticides and fertilizers associated with the nearby orchards and the golf course, and various other polluting materials emanating from the local community that reach the ponds are trapped and likely accumulate there over time.

In 2016, NCWAS wrote and shared with the City of Rock Island a Vision Paper expressing our thoughts on the future of RIP once mining operations there have ceased. Central Washington Concrete is expected to cease gravel mining operations at Rock Island by the end of 2024.

To realize our vision for the future of RIP, NCWAS engaged with the City of Rock Island and the PUD Relicensing Process. Unfortunately, the Relicensing Process proved to be a very poor fit for the issue, as the PUD determined there to be no “nexus” between the ponds and RID operations. To no avail, we raised objections to this conclusion based upon the fact that the RIDP elevations influence those of the ponds. To put it most clearly, the ponds and RIDP are aquatically connected. Most recently, the PUD has initiated a separate process to consider

removal of the ponds from the RID project boundary. We are participating in this process as well and will continue to do so.

Throughout our engagement with the PUD Relicensing Process, we have consistently suggested that baseline environmental quality studies are needed to identify current conditions in and adjacent to the ponds and to determine if/how they communicate with each other underground. Additionally, because the RIP area may be removed from the project boundary in the future, it is important to assure the ponds are in good condition when/if the boundary is changed and the lands the PUD owns under and adjacent to Big Bow and Hideaway Ponds are potentially transferred to new ownership. For both of these reasons, and as plans are being considered for the ponds' future, we suggest studies are necessary to assess environmental quality issues currently present there and recommend they be completed no later than Spring/Summer of 2026.

**Goals and objectives of the studies; Information to be obtained**

As mentioned above, we have significant concerns about water quality, water temperatures, potential soil contamination, and various forms of junk/trash in and affecting the ponds and the wildlife populations that depend upon them. Also unknown are if/how the ponds communicate with each other and the RIDP via ground water and what the potential contamination impacts of such connectivity might be. The goals are to determine issues we think are likely negatively impacting the health of the ponds. Obtaining the information such studies would provide is critical to improving the ponds' current conditions and critical to planning for their future. We believe such studies are warranted whether the RIP area is eventually removed from the project boundary or not.

**Public interest considerations**

There is considerable public interest in the ponds. Together, they are probably the City of Rock Island's most visible feature. They are the focal point of various forms of recreation and the City's current robust growth. Understanding the issues affecting them is important to maximizing the current and future values they offer the community and visiting public.

**Existing Information and the need for additional information**

NCWAS and the City of Rock Island have been looking to the future of the ponds area for years. Though current conditions there are currently not ideal, the ponds offer substantial economic and cultural value to the local community and region. The information produced by the studies we're recommending is critical to understanding the present condition of the ponds and is needed as plans for their future are made.

**Nexus between project operations and any direct, indirect, and cumulative effects**

As mentioned above, NCWAS believes RIDP fluctuations affect ground water levels and thereby water levels in the ponds at Rock Island. If we're correct, this constitutes connectivity between the ponds, RIDP and, thereby nexus to project operations. As mentioned previously, because of the lack of surface inflow to or outflow from the ponds, we believe contaminants entering them accumulate there over time.

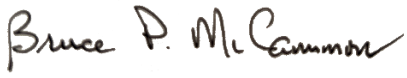
**How is the proposed study methodology consistent with accepted scientific practices.**

We propose that a qualified professional firm be contracted to design and implement the studies we recommend. Competitive bidding should be the foundation for contractor screening and vetting.

**Cost and effort considerations**

NCWAS suspects there are issues currently impacting the ponds that are, at best, less than ideal. We have consistently encouraged the PUD to recognize the need for designing and implementing a thorough and comprehensive set of baseline studies to confirm conditions there now and as plans are made for the future. The PUD has resisted addressing this concern, so the studies we've called for have not been planned or designed. Without this, costs can't be determined or even reliably estimated. While costs are a valid concern and presently unknown, we feel the need for the studies we're calling for is clear.

Art Campbell
NCWAS President



Bruce McCammon
NCWAS Board member

# Links embedded in the letter

NCWAS final bird survey report for Rock Island Ponds
https://ncwaudubon.org/wp-content/uploads/2024/02/NCWAS-Rock-Island-Ponds-Bird-Survey-Report.pdf

Douglas County ownership parcel map and information
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