January 9, 2017

Army Corps of Engineers
Bureau of Reclamation
Bonneville power Administration

Subject: COLUMBIA RIVER SYSTEM OPERATION EIS

The City of Lewiston, Idaho requests that the Federal Agencies ("FAs") involved in updating the Columbia River System Operation EIS ("EIS") evaluate the following questions and concerns in the EIS.

1. The City's critical infrastructure such as the water treatment plant intake, sewer lift station discharge and storm water pond and outfall system are all connected to the rivers. These facilities are designed to operate in concert with the rivers at a specific point, elevation and grade. What mechanism will the FA’s use to keep these critical infrastructure systems operational for the city if the dams are breached? How will the City be kept whole?

2. The area’s largest employer, Clearwater Paper, is also dependent on the river being at a specific location for their water intake and discharge. How will they be impacted?

3. The storm drainage ponds on the Snake and Clearwater Rivers, located north and west of Lewiston are now owned and operated by the Corps of Engineers. The southerly pond skims oil; two others filter sediment. How will the functional characteristics and management costs of this system change if the dams are breached? Will the water quality characteristics of the discharge change and potentially impact the City’s NPDES Permit?

4. Where will the new high water mark be in relation to the government take line when the lakes were created? Who will own and manage the land uncovered? The City might be interested in taking ownership after clean-up of the site (toxins, garbage, car bodies, construction materials etc.).

5. The lake has created value in lakefront (riverfront, river view) properties, flat water recreation and a local boat builder’s industrial cluster. Tourism is one of the region’s largest industries. Cruise ships alone contribute 1.4 million dollars to the local economies. What are the economic impacts to the city if the dams are breached?

6. A second important driver in the region’s economy is agriculture. The Port of Lewiston and other Ports provide a cost effective and low environmental footprint
transportation mode for these products. What alternative modes of transportation would be available considering the limited road and rail capacity of the area? Who would shoulder the burden of increasing the capacity of other options? What are the environmental impacts of that decision? Some local areas such as Asotin and the Palouse are not now served by rail.

7. The current levy system along the rivers provides an important recreational amenity. Would these levees remain? If not, who would be responsible to pay to remove? If they are to remain, could they be lowered or relocated and, if so, who would be responsible to pay? Would they still be owned, maintained and annually certified by the COE? The City might be interested in accepting ownership of the levees if the annual certification was done at federal expense. The corrugated pipes within the levee need to be TV’d to help inform our decision. We also have limited taxing authority and would ask for an endowment to offset expenses.

8. The current dike system will change from constant impoundment of water (also known as an earthen dam) to intermittent impoundment known as a levee. Will this change cause downtown Lewiston (and other areas) to be identified as a Zone B floodplain requiring property owners to purchase flood insurance as a result? (B zones are used to designate base floodplains of lesser hazards, such as areas protected by levees from a 100-year flood). Will the local community be obligated to provide any reports or certifications on this feature (dike, levy)?

9. The FA’s have been directed to incorporate an analysis of climate change in the EIS. Draining of the lakes to create a run of the river system will remove a moderating impact on Lewiston’s temperatures. Please consider this localized climate change, which will create higher energy consumption and accelerated deterioration of infrastructure, buildings, personal property, trees and other vegetation due to higher summer temperatures and lower winter temperatures. How will electric rates change without hydro-electric power on the grid?

10. In 1992 when the lakes were drained, the levees started dewatering. They became unstable under heavy loads; rail sloughed off. Can we expect this to happen again? Where can we expect damage to critical infrastructure and who will pay to repair the damage?

11. Where will all the sediment/mud go that was impounded behind the dams? Is it contaminated with heavy metals? Who would be responsible to pay for clean-up and restoration?

12. As reported in a 12/13/16 Bureau of Reclamation and Bonneville Power Administration webinar on the CRSO, 57 million tons of product are transported on the river. Loss of the river as a transportation mechanism for these products would
require an additional 2 million tractor trailer trips. How will this change affect the City of Lewiston’s transportation infrastructure and operating system?

Thank you for taking our views into consideration.

Sincerely;

James Kleeburg

Mayor City of Lewiston