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BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of Application No. 2006-01:  
ENERGY NORTHWEST;  
PACIFIC MOUNTAIN ENERGY CENTER

**EXHIBIT \_\_ (ADE-T)**

**APPLICANT'S PREFILED TESTIMONY**

**WITNESS: A. DAVID EVERY**

**Introduction**

**Q. Please introduce yourself to the Council.**

A. My name is David Every.

**Q. What is the subject of your testimony?**

A. My testimony will address three topics:

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First, my background and experience.  
Second, the wetland resources affected by P MEC.  
Third, the mitigation opportunities.

**Background**

**Q. What is your occupation and title?**

A. I am a Principal Ecologist with URS Corporation in our Seattle, Washington office.

**Q. Please describe your background.**

A. I am a biologist and environmental permitting specialist with more than thirty years of experience in environmental impact assessment, NEPA/SEPA permitting, and natural resource mitigation. Much of my consulting practice has focused on wetland issues, including wetland delineation, wetland mitigation design and implementation, and obtaining federal, state and local permits regarding projects affecting wetlands. A copy of my resume is provided as Exhibit \_\_\_ (KC-2) accompanying Katy Chaney's testimony.

**Q. What is your role in connection with P MEC?**

A. Energy Northwest has retained URS Corporation to assist with licensing the proposed Pacific Mountain Energy Center (P MEC). My staff and I are addressing the effects to and mitigation for biological resources (wetlands, aquatic and terrestrial species, vegetation and noxious weeds). I am the senior biological consultant for this task at URS Corporation. In this capacity, I have provided senior review, regulatory and technical guidance, and mitigation design input to my staff and P MEC.

1 **Q. Have you done any previous work regarding wetland issues in the Kalama area?**

2 A. Yes. I have worked on five industrial projects in the Southwest Washington area. I provided  
3 wetlands guidance for an underground natural gas storage project in Jackson Prairie and for  
4 the Centralia coal mine. I have assisted with Port projects in Clark County, Washington and  
5 two pipeline corridor projects in Cowlitz County, Washington.

6  
7 **Q. Are you working with other consultants or PMEC staff regarding the biological  
8 resource issues associated with PMEC?**

9 A. Yes. Bill Kidder and Jeff Walker, wetland biologists with URS Corporation, are doing the  
10 primary wetland and terrestrial resources mapping, impact assessment, and mitigation design.  
11 Andrea Balla-Holden, a URS fisheries biologist, is addressing the aquatic and fish species  
12 impacts.

13  
14 **Wetland Resources Affected by PMEC**

15 **Q. Can you generally describe the site for PMEC and its components?**

16 A. Energy Northwest is proposing to construct the PMEC on a 95-acre site located at the north  
17 end of the Port of Kalama (Port) just north of the City of Kalama, Washington. A diagram of  
18 the site was provided as Figure 2.3-1 of the Application for Site Certification  
19 (“Application”). The Application is on file with EFSEC and is available on its website  
20 ([www.efsec.wa.gov](http://www.efsec.wa.gov)). As part of PMEC, Energy Northwest would construct new and/or  
21 access existing rail and pipeline facilities to provide delivery of feedstock. PMEC would  
22 have access to the Port’s North Dock for unloading feedstock delivered by water. Energy  
23 Northwest would construct a railroad spur that links to the Burlington Northern Santa Fe  
24 (BNSF) railroad mainline immediately adjacent to PMEC and a natural gas pipeline that  
25 would tie into the Williams pipeline about five (5) miles south of the site on Port land.

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Separately, Cowlitz PUD or Bonneville Power Administration (BPA) would be upgrading about twelve (12) miles of existing transmission line to provide electricity distribution from PMEC. A diagram of the project components was provided as Figure 2.1-2 of the Application. The proposed transmission line route is shown on Exhibit 2-5 of the Draft Environmental Impact Statement (DEIS). The DEIS is on file with EFSEC and is available on its website ([www.efsec.wa.gov](http://www.efsec.wa.gov)).

The PMEC site is vacant land created from disposal of material dredged from the Columbia River. It is dominated by sand and gravel with some non-native vegetation growing sparsely across the site. The PMEC site includes a 2.1 acre section of tidally influenced wetland that the Port is proposing to fill, which provides off-channel habitat for Columbia River fish and wildlife using the wetlands north of the site that the Port is proposing to fill. The Port has submitted an application to fill this wetland independently of PMEC as part of its Port development plans.

PMEC would construct the railroad spur through a wetland located on BNSF land. This wetland contains a mosaic of vegetation communities and is used by several types of wildlife. It is not accessible by fish from the Columbia River due to topography and a debris jam and culvert near the north end of the wetland. PMEC would construct the natural gas pipeline through an existing utility corridor situated under the Port's access roads. The pipeline would require one river crossing to be either drilled underneath the Kalama River, or hung on the underside of the existing vehicular bridge.

The Cowlitz PUD electricity transmission system traverses urban, rural, and natural areas along its length. It crosses the Cowlitz River just upstream of its mouth. The natural areas

1 include wetlands, priority habitats, farmland, and the Cowlitz River riparian system. The  
2 PUD will upgrade and manage the transmission corridor and will be responsible for wetland  
3 and critical areas permitting and mitigation required for that construction and operation.  
4

5 **Q. What efforts were made to identify and delineate wetlands on the site?**

6 A. URS conducted a wetland reconnaissance followed by a delineation in April 2006 of the  
7 components that PMEC is constructing. Follow up visits occurred in August, September, and  
8 December 2006 and July 2007 to gather additional information and to observe changes to the  
9 railroad spur wetland. The Wetland Delineation Report is provided as Exhibit \_\_\_ (ADE-1).  
10 I conducted a field visit in September 2007 to observe the latest conditions and confirm my  
11 understanding. I visited the proposed mitigation site in December 2006 and August 2007.

12  
13 The wetland delineation was performed according to the methodology described in the U. S.  
14 Army Corps of Engineers 1987 Wetland Delineation Manual and subsequent regulatory  
15 guidance letters. Wetland functions and category ratings were assessed using Washington  
16 Department of Ecology's Washington State Wetland Rating System for Western Washington  
17 – Revised (2004). Category ratings were also assessed using the rating specifications  
18 available in the Cowlitz County code.

19  
20 **Q. Please describe the existing wetland conditions present within the project components?**

21 A. The Wetland Delineation Report, Exhibit \_\_\_ (ADE-1), identifies the wetlands in the vicinity  
22 of the project components. Several wetland complexes are located adjacent to PMEC  
23 components and are not anticipated to be filled or impacted by PMEC construction or  
24 operation.  
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One seasonally to permanently flooded palustrine wetland occurs where the railroad spur is proposed to be constructed. Exhibit \_\_\_ (ADE-1) illustrates this wetland and the proposed railroad spur footprint. This wetland is 8.86 acres in size and contains multiple vegetation communities, several wildlife habitat features, and hydrology dominated by groundwater level fluctuations. The wetland is connected via culverts to, but hydrologically separated from, wetlands upstream and downstream of the railroad spur wetland. The culverts allow water to pass downstream through the culverts during high water periods into the Columbia River wetland complex north of the P MEC site. At the time we prepared the Application for Site Certification and the JARPA application, a debris jam/beaver dam immediately upstream of this wetland’s outlet culvert prevented the wetland’s water level from draining down to the culvert’s outlet elevation. It also prevented water from the Columbia River wetland complex north of the P MEC site from potentially backfilling into the wetland. An existing wetland mitigation area was established in the southwest portion of this wetland in the late 1980’s. This mitigation area is located outside and west of the proposed railroad spur footprint.

The natural gas pipeline would not impact any wetlands or the Kalama River because the project proposes to directionally drill below the Kalama River riparian corridor. Exhibit \_\_\_ (ADE-1) illustrates the approximate pipeline route.

**Q. Have conditions changed in the wetlands since the Draft EIS was published?**

A. Yes. The debris jam/beaver dam that restricted water draining out of the railroad spur wetland was partially removed by the landowner, BNSF, in spring or summer 2007. The water level in the wetland dropped, but part of the debris jam/beaver dam still remains, preventing the wetland water level from equalizing with the outlet culvert elevation.

1 **Q. What functions does the railroad spur wetland serve?**

2 A. The category 2 wetland within the railroad spur project component contains high quality  
3 habitat and relatively rare habitat features that support foraging and breeding waterfowl,  
4 other birds, amphibians, beaver, and other wetland-associated mammals.

5  
6 The level of function for fish use is considered low because of limited access. Prior to the  
7 landowner partially clearing the debris jam, fish could not access the wetland because of a  
8 woody debris jam/beaver dam, vegetated by blackberries, grasses, and shrubs, and situated  
9 above a culvert. The culvert and several feet of elevation over the debris jam/beaver dam  
10 prevented fish passage. Because of the previous obvious blockage to fish passage, the  
11 potential for fish access to the wetland was not further studied.

12  
13 The railroad spur wetland rates high for water quality and hydrologic functions. The wetland  
14 hydrology is driven by a seasonally high groundwater table and limited surface water runoff.  
15 The stormwater runoff originates from the BNSF railroad and adjacent industrial access  
16 roads. The debris jam/beaver dam still retains these waters in the wetland for long periods,  
17 reducing downstream erosion and water quality problems.

18  
19 **Q. How will construction of the PMEC facility affect wetlands at the site?**

20 A. As addressed in the DEIS, construction and operation of PMEC would permanently fill about  
21 1.3 acres of the railroad spur wetland. Habitat functions would be reduced proportional to  
22 the reduction in wetland area. The hydrologic functions would remain relatively unchanged  
23 because the project proposes to maintain the wetland's existing hydrologic characteristics.  
24 The water quality functions are unlikely to change beyond the existing baseline conditions.

1 Construction of the P MEC components may also temporarily impact wetlands or wetland  
2 functions north of the P MEC site, in the railroad spur wetland, and/or along the Kalama  
3 River. Temporary impacts might include light, noise, or visual disturbances, but this area is  
4 already an industrial zone with trains, shipping vessels, and delivery trucks transporting  
5 materials and products to and from the adjacent manufacturing facilities. Temporary impacts  
6 in the railroad spur wetland may include decreased water quality when fill material is placed  
7 in the wetland. Standard construction best management practices for maintaining water  
8 quality would be established to contain and minimize potential water quality reductions  
9 during construction. Potential temporary impacts from the natural gas pipeline construction  
10 could include drilling mud escaping through geologic fractures to the wetland surface (“frac-  
11 out”). Directional drilling best management practices would be initiated to reduce the  
12 potential for frac-out.

13  
14 Operational impacts to the wetlands and wetland functions would be within the existing  
15 background conditions present in this industrial setting.

### 16 Wetland Mitigation

17  
18 **Q. Has P MEC submitted a Joint Aquatic Resource Permits Application (JARPA) to the**  
19 **U.S. Army Corps of Engineers to authorize the filling of wetlands necessary to**  
20 **construct the facility?**

21 A. Yes.

22  
23 **Q. What is the status of that permit?**

24 A. The permit application was submitted in April 2006. Per conversation with the Corps on July  
25 16, 2007, public notice was advertised and the public comment period ended on June 25,  
26

1 2007. The Corps reviewed the comments and compiled a response to the P MEC application.  
2 A letter requesting additional information was issued by the Corps on August 8, 2007. A  
3 response letter requesting more time for detailed response was submitted on September 6,  
4 2007. On September 14, 2007, the Corps responded approving the request, extending the  
5 time to respond to October 31, 2007.  
6

7 **Q. Please describe the wetland mitigation plan P MEC has proposed?**

8 A. P MEC proposes to create and enhance wetlands offsite on a 15-acre site to mitigate for  
9 permanent wetland impacts. A detailed description is provided in the Conceptual Wetland  
10 Mitigation Plan provided as Exhibit \_\_ (ADE-2).  
11

12 Proposed mitigation would feature a wetland that simulates a historic river channel meander  
13 in a hay field/pasture located in the Coweeman River floodplain in Kelso, Washington. The  
14 meander would be designed to fill with water during a flooding tide and drain completely on  
15 the ebbing tide. A mosaic of native emergent, scrub-shrub, and forested habitats would be  
16 established in the wetland and wetland buffers. The mitigation goals are to recreate a similar  
17 habitat condition and functions to those being lost.  
18

19 **Q. The proposed mitigation is outside the P MEC site's watershed. Why is P MEC**  
20 **proposing mitigation so far from P MEC's site?**

21 Energy Northwest initially investigated several possible mitigation opportunities in the  
22 Kalama River basin. Discussions with WDFW, Department of Ecology, and Cowlitz County  
23 staff during a September 6, 2006 pre-application meeting determined that each of those sites  
24 would either not meet the intent of the law, not provide all necessary mitigation required, or  
25 not succeed due to hydrology issues or potentially overwhelming presence of invasive  
26

1 species. The agencies also recognized that limited mitigation opportunities are available in  
2 the Kalama basin and agreed to allow Energy Northwest to expand the search for a suitable  
3 mitigation site to within Cowlitz County. The proposed mitigation site was determined to be  
4 the best option among more than 10 possibilities. Other sites were discarded due to reluctant  
5 landowners, concerns with achieving appropriate functions in the face of severe invasive  
6 species concerns, hydrology, and distance from the site (including sites outside the county).

7  
8 **Q. What is the mitigation ratio for P MEC's wetland mitigation proposal?**

9 A. The conceptual mitigation plan would provide a mitigation ratio of 3 or 4 to 1 with  
10 substantial buffers. The design and this ratio are a starting point for discussions with EFSEC  
11 and the Corps of Engineers.

12  
13 **Q. Does this complete your testimony?**

14 A. Yes it does.

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17 **EXHIBIT LIST**

18

<b>Ex. No.</b>	<b>Prefiled No.</b>	<b>Description</b>
	ADE-1	Wetland Delineation Report
	ADE-2	Conceptual Wetland Mitigation Plan

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