

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of Application No. 96-1

Olympic Pipe Line Company

Cross Cascade Pipeline Project

**PRE-FILED TESTIMONY OF
GEORGE F. WOOTEN**

ISSUE:
FIELD SURVEY OF PROPOSED
CROSS CASCADE PIPELINE ROUTE:
NORTH BEND TO CLE ELUM

SPONSOR:

City of North Bend, Washington
City of Snoqualmie, Washington
Cascade Columbia Alliance

**BRICKLIN &
GENDLER,
LLP**
ATTORNEYS-AT-
LAW
SUITE 1015
FOURTH AND
PIKE BUILDING
1424 FOURTH
AVENUE
SEATTLE, WA
98101
(206) 621-8868

Could you please identify yourself and summarize your experience and education relevant to your work?

My name is George Wooten. I attended graduate school in pharmacognosy and medicinal chemistry and received a Bachelor of Arts in biochemistry and genetic engineering. I have worked for 12 years as a botanist, engaged in numerous projects calling for botanical and technical consultation, focusing on endangered and threatened species.

Are you familiar with the Cross Cascade Pipeline proposal submitted to the Energy Facilities Site Evaluation Council by Olympic Pipe Line Company?

Yes. I have reviewed those portions of the EFSEC Application submitted by Olympic Pipe Line that are relevant to my expertise as well as some of the supporting documents prepared by Olympic's experts for the proposal, including the Fisheries Report, the Vegetation Report, the Wetlands Report, and the Biologic Report. I, along with Dana Visalli, with whom I work, conducted a biological field survey of the proposed Cross Cascade Pipeline route during September and October of 1997.

Could you describe in more detail exactly which portion of the pipeline route you hiked for your field survey?

Our field surveys involved walking 50 miles of the route between North Bend and Cle Elum, while recording notes, mapping observations, and taking photographs. We walked the entire survey areas except the Hyack tunnel, which was closed during our survey. Attached hereto as Exhibit GFW-2 is a list of species of concern and priority habitats which occur on the pipeline route, or have historically been documented there, or are suspected to have ranges on or near the proposed pipeline route between North Bend and Cle Elum. I have also attached some of our photographs to this testimony as Exhibit GFW-3.

What specific areas did you focus on in your review of that portion of the route?

We looked at the streams and wetlands along the route, and habitats for threatened or endangered species or otherwise sensitive species along the route, based on vegetative composition, topography, microclimate, and geology. We also spotted specific problem areas where mitigation may not be possible, specifically at Olallie Creek and the wetland complex between Spex Arth Creek and the power line corner.

Could you tell us about the riparian areas and wetlands you saw?

Yes. From walking the route, it became quickly evident to us that a significant amount of wetlands and riparian areas were not included or discussed in Olympic's Application. For example, in the ten miles between Easton and Cle Elum, we found at least nine wetlands directly on the pipeline route that were omitted, including the Spex Arth Creek wetlands and the center of an extensive wetland complex one mile west of Spex Arth Creek. Page 1 of Exhibit GFW-3 includes photographs of these wetlands.

The Application also failed to identify and document many streams and associated wetlands. For example, in approximately two and a half miles of trail along the southwest side of Keechulus Lake, we saw 29 riparian crossings where the Application listed only five stream crossings and the Fisheries Report listed only 13. In another area, near North Bend, five streams and/or associated wetlands were completely omitted from the Application along a 1.5 mile stretch.

You earlier indicated that in your field survey you spotted some problem areas where mitigation may not be possible. Could you tell us more about those?

Yes. These problem areas are the Spex Arth area wetlands (one mile west of Spex Arth Creek) and the Olallie Creek crossing.

In the Spex Arth area, shown in the photos on page 4A-D of Exhibit GFW-3 and represented in Exhibit GFW-4, the pipeline route (May, 1997 realignment) follows a complicated route, traveling first under a power line corridor on a steep slope and then through spotted owl territory on Forest Service land, then across a section of commercial land, then into an old growth patch on Forest Service land in another spotted owl area. It then crosses two survey and manage species, and then crosses the large wetland. The route would involve removal of old growth and wetlands from a spotted owl habitat area and destruction of survey and manage and Forest Service sensitive species. The applicant does not document whether federal survey and manage surveys were performed, nor how the loss of trees, logs, snags, and soils would affect all of these species. The Application did not discuss how the power line corner crossing, requiring a 30 foot deep tunnel on steep, rocky ground would be accomplished, nor was the wetland crossing delineated as "wet." Other proposed routes appear to cross a longer stretch of wetlands but still impact the old growth.

Another problematic area is the Olallie Creek crossing shown in photos on page 3A-D, of Exhibit GFW-3 and also represented in Exhibit GFW-5. Between Olallie Creek and the West Hyack tunnel entrance is an earthen dam alongside

collapsing 100 foot high side slopes. The forest atop the slope is sliding over the cliff (see photo, page 3A). Olallie Creek is diverted into a massive tunnel, which has undercut banks below the diversion outlet overhanging the creek bed five feet out and 20 feet high, threatening collapse and/or initiation of a debris flow. The channel below the outlet has begun active scour over 15 feet deep in unconsolidated alluvium. The proposed route crosses a power line corridor at this location, then goes straight uphill toward the tunnel. The earthen dam is about the same size as one that was observed washed out on nearby Wood Creek. However, if Olallie Creek were to experience a similar size of wash out, the proposed buried oil pipeline would be in jeopardy.

Did you observe any areas where the proposed buried pipeline would be subject to potential wash out or rupture?

Yes. There were several hazard areas where the pipeline would be subject to damage from debris flows, landslides, erosion, or flooded areas. These areas were not disclosed in the Application. There were several along the entire 50 miles which we hiked.

Did you consider what species or habitats may be negatively impacted by the Cross Cascade Pipeline proposal?

Yes. Numerous imperiled species have been documented which were not addressed in the Application. Attached hereto as Exhibit GFW-2 is a list of species of concern and priority habitats which occur on the pipeline route, or have historically been documented there, or are suspected to have ranges on or near the proposed pipeline route between North Bend and Cle Elum.

What methods did you use to support these conclusions?

We conducted a pre-field review for known sightings of species, habitats, and other areas with protective status or requiring project mitigation. We considered all federal threatened and endangered species, Washington State and Forest Service Region 6 endangered, threatened, or sensitive (TES) species, survey and manage species on federal lands, Washington State priority habitats and species, other managed species of concern, unique habitats of state concern, and geologic disturbances. This review was conducted through examination of records from the Washington Natural Heritage Program, State Priority Habitats and Species database from the Washington Department of Fish and Wildlife, Dames & Moore and other technical reports for the proposed pipeline, and consultation with agency personnel charged with species management.

**BRICKLIN &
GENDLER,
LLP**
ATTORNEYS-AT-
LAW
SUITE 1015
FOURTH AND
PIKE BUILDING
1424 FOURTH
AVENUE
SEATTLE, WA
98101
(206) 621-8868

cca\experts\wooten.pft

END OF DIRECT TESTIMONY OF WITNESS

**BRICKLIN &
GENDLER,
LLP**
ATTORNEYS-AT-
LAW
SUITE 1015
FOURTH AND
PIKE BUILDING
1424 FOURTH
AVENUE
SEATTLE, WA
98101
(206) 621-8868