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BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

IN RE APPLICATION NO. 96-1)
)
OLYMPIC PIPE LINE COMPANY:)
CROSS CASCADE PIPELINE PROJECT)
)

EXHIBIT _____ (KC - RT3)
REBUTTAL TESTIMONY OF KATY CHANEY
ISSUE: STREAM CROSSINGS, WATER QUALITY & WATER RESOURCES
SPONSOR: OLYMPIC PIPE LINE COMPANY

1 **R. State your name.**

2 A. Katy Chaney

3 **Q. What topics will you address in your rebuttal testimony?**

4 A. My rebuttal testimony is intended to respond to all of the testimony filed concerning
5 environmental or land use impacts related to the project, and the mitigation of those impacts. My
6 rebuttal testimony will address the following topics:

- 7 (1) Olympic's approach to environmental assessment and mitigation;
- 8 (2) Visual Impacts;
- 9 (3) Noise Impacts;
- 10 (4) Geotechnical hazards;
- 11 (5) Stream Crossings, Water Quality and Water Resources
- 12 (6) Fish, Wildlife and Endangered Species
- 13 (7) Wetlands and Vegetation;
- 14 (8) Recreation;
- 15 (9) Land Use, including Agriculture.

16 For the Council's convenience, my rebuttal testimony has been divided into several different
17 exhibits, organized roughly according to the likely organization of the adjudicatory proceedings.
18 This exhibit addresses stream crossings, water quality and water resources.

19 **River & Stream Crossings**

20 **Q. Does the Application address river and stream crossings?**

21 A. Yes. The proposed project crosses 154 rivers and streams. Water quality class ratings for the
22 larger names streams crossed by the pipeline were obtained from the Washington Department of
23 Ecology. Average monthly flow characteristics were obtained from the USGS. Stream surveys
24 were performed by Dames & Moore biologists as described in my testimony on fishery issues.
25 Table 3.3-6 identifies each river or stream, indicates the crossing method to be used, and

1 provides additional information about the crossing. The Application, beginning on page 3.3-23,
2 includes a discussion of surface water resources by Water Resource Inventory Area (WRIA).

3 **Q. What has Olympic done to minimize the number of stream crossings that will use invasive**
4 **crossing methods?**

5 A. Olympic has proposed to use existing bridges wherever feasible, has proposed to place the
6 pipeline over and under culverts in many locations, and has proposed to directionally drill a
7 number of river and stream crossings. For the remainder, OPL has done an analysis of whether
8 the stream bank geometry would allow space for a directional drill or jack-and-bore, and whether
9 the impacts of clearing space for the drill would be greater than the temporary impacts to the
10 streams. There are some areas along the route where the topography of the stream relative to the
11 stream bank does not allow for the use of a drilled crossing.

12 **Q. Have there been any changes in stream crossing methodology since the Application was**
13 **filed?**

14 A. Yes. Several of the crossings that Olympic had originally proposed to trench, Olympic no
15 proposes to cross by horizontal directional drilling (HDD), by using an existing bridge or by
16 crossing over an culvert. Those crossings are as follows:

- 17 • Bear Creek - HDD
- 18 • Bear Creek Tributary including SR9 - HDD
- 19 • Cherry Creek - HDD
- 20 • Harris Creek - HDD
- 21 • Tolt River - HDD
- 22 • Boxley Creek - bridge
- 23 • Carter Creek - bridge
- 24 • Hansen Creek - bridge
- 25 • Humpback Creek - culvert

- Olallie Creek - culvert
- Yakima River - HDD

Q. Will other Dames & Moore witnesses be addressing stream crossing issues?

A. Yes. Rob Neilsen will be discussing stream crossings and fisheries impacts. Mark Molinari and Conrad Felice will be addressing the Tolt River and Columbia River crossings. Roy Elliott will be addressing water resources in general, and Steve Wilbur will be addressing the potential effects of scour.

Water Quality

Q. Does the Application address water quality issues?

A. Yes. Water quality issues are addressed in Section 3.3 of the Application. During construction, potential short term impacts could occur to surface water from channel and bank disturbances, and erosion and sedimentation. Olympic has proposed a number of measures to eliminate or greatly minimize the risk of erosion and sedimentation, as described in Sections 2.10, 3.1 and 3.3 of the Application. These measures include minimizing the area of disturbance, avoiding time periods when significant amounts of erosion could occur, effective implementation and monitoring of the Best Management Practices (BMPs) as outlined in WDOE's Water Quality Manual for Puget Sound, and effective long term monitoring of erosion conditions after major storm events.

Q. In their testimony, some witnesses have raised issues concerning stormwater. Will a stormwater pollution prevention plan be prepared for this project?

A. Yes, as noted on page 2.17-4 of the Application, a Stormwater Management Plan will be prepared per NPDES requirements.

Q. In his testimony, Todd Bohle (DNR) raised concerns about elevated stream temperatures as a result of trees removed in connection with construction activities. How do you respond to that testimony?

1 A. My interpretation of Mr. Bohle's testimony is that he is speculating that there could be a
2 cumulative rise in water temperature based on the removal of trees that currently shade streams.
3 Only 21 of the 293 water body crossings for the entire 230 mile route (which includes crossings
4 of wetlands, irrigation canals, and areas where the streams are within existing culverts) have
5 riparian areas dominated by trees. The remainder of the crossings are on existing bridges or
6 trails, or have grasses or shrubs in the riparian areas surrounding the streams. The pipeline has
7 been routed to maximize the use of already cleared trails and rights-of-ways. Where new
8 corridors need to be created, the maximum corridor width at a stream crossing would be 60 feet,
9 and these would be narrowed to 30 feet in areas where wetlands are present or other types of
10 important habitats exist. As noted on page 3.4-104 of the Application, there are six streams and
11 rivers that will be crossed by the pipeline that presently fail to meet the temperature criteria for
12 their water quality classification. These are Tokul Creek, Big Creek, the Yakima River, Swauk
13 Creek, Cooke Creek, and Lower Crab Creek. Trees will possibly be removed from the riparian
14 zone of only one of these streams, Tokul Creek, and the narrow construction corridor would keep
15 temperature impacts to an insignificant level. Olympic, however, currently proposes to cross
16 Tokul Creek using a bridge, which would eliminate any need for tree removal. The pipeline has
17 also been routed to avoid the trees along the Yakima River. Even so, Olympic has proposed to
18 plant cottonwood trees along the Yakima River as a mitigation measure for potential cumulative
19 impacts caused by potential tree removal along stream tributaries to the Yakima River.

20 Water Resources

21 **Q. Does the Application contain an analysis of water resources?**

22 A. Yes. Section 2.5 of the Application describes the water supply needs for the project, whereas
23 Section 3.3 describes surface and groundwater resources that will be crossed by the pipeline
24 corridor.
25

1 **Q. What water resources will be necessary for construction and operation of the proposed**
2 **project?**

3 A. As I explained in my initial direct testimony, relatively little water will be required for the
4 construction and operation of the proposed project. During construction, small amounts of water
5 will be used for dust control. During construction, Olympic will also need approximately 1.5
6 million gallons of water to hydrostatically test the pipeline. Water for hydrostatic testing will be
7 purchased from the Alderwood Water District and the City of North Bend, and obtained from the
8 Cascade Irrigation Canal and Wahluke Branch Canal, as Olympic, as the site owner for the
9 Kittitas Terminal, has rights to irrigation water from both of these canals. Once in operation,
10 Olympic will require minor amounts of water to operate restroom facilities at the Kittitas
11 Terminal. Olympic will also require water for fire protection at the Kittitas Terminal. This water
12 will be obtained from the City of Kittitas or the Kittitas Reclamation District.

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14 DATED: March 24, 1999.

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17 Katy Chaney
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