



## Spokane Falls Chapter of Trout Unlimited

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June 23, 2009

City of Spokane  
Planning Services Department  
Attn: Tamara Palmquist  
808 W. Spokane Falls Blvd.  
Spokane, WA 99201

***Subject: Spokane River Whitewater Park SEPA Comments***

Dear Ms. Palmquist:

After reviewing the project plans, Spokane Falls Chapter of Trout Unlimited has several immediate and specific concerns regarding the proposed whitewater park at the Sandifur Bridge area in the proposed Great Gorge Park.

First we want to state clearly that our chapter realizes the benefits of encouraging citizens to engage in healthy, river-oriented recreation with our Spokane River. Many of our members are both boaters and trout advocates. In general, we appreciate the work of the boating community, the city, and their partners in recognizing the recreational, aesthetic and environmental benefits for this type of river use. The value of recreational activities like kayaking in raising an awareness of issues that face our river can be a positive force in developing a community consciousness that supports a healthy river landscape.

*However, this appreciation does not translate to unconditional or even conditional support of the Whitewater Park proposal as it is now planned. We feel this project poses a significant risk to redband trout populations living in the project area.*

Redband trout, *Oncorhynchus mykiss*, are a self-sustaining wild fish that are very probably native to the project area. These fish use the Sandifur project area to spawn in, migrate through, rear young and find cover in the pools of the area. These fish are increasingly rare and are of great concern in the context of planning for this project. Our specific concerns are as follows:

1. To date, no *comprehensive* spawning habitat survey has been conducted in the project area. One study of tracked fish confirms that redband trout do indeed

use the area to spawn, but the study is not exhaustive, and we therefore have no idea *how* significant the project area is to the survival of redband trout and mountain whitefish. More data is needed before we can understand what impacts a whitewater structure may have on the reproduction of native fish (trout, whitefish, suckers).

2. Additionally, fish passage and migration remain a concern. Currently, very little data exists concerning migration patterns of redband trout or mountain whitefish in the lower Spokane River. We do know, anecdotally, that both species migrate for a variety of purposes and that this migration needs further study in order to be understood prior to the potential change of river dynamics as a result of project actions.

Both mountain whitefish and redband trout move up and down the river at spawning periods, winter months and stressful periods of summertime low flow. Fish habitat is very dynamic and fish must be allowed to move freely in all seasons. If they aren't allowed to migrate, they cannot effectively exploit their habitat in a manner that allows them to thrive. It's essential that computer models of flow regimes are conducted for this structure and the modified river channel at *every flow regime*, including summertime flows as low as **500 cfs**. The community must be assured that adequate fish passage is readily available at every flow level.

Also, the current designs have the structure protruding with a concrete anchor into the north channel. This channel should remain free of any modifications.

3. SFTU is concerned about the planned work in a dewatered river zone. We do not have adequate information on the impacts of dewatering the river nor the specific plans for activity by the contractor in that zone. This makes it hard to predict what effect the action will have on the aquatic life of the river. The river is a complex system and trout depend on macro invertebrates and other small aquatic life for their survival. The City of Spokane needs to assure the public that the actions of the contractor in the dewatered zone will not harm this aquatic system.
4. Due to the history of whitewater park construction in other parts of the nation, SFTU is concerned as to who and how a construction contract will be administered. Over-sight and the assurance that such a project will be constructed exactly as designed, with environmental regulations and erosion constraints that are strictly followed is essential yet remains uncertain. What are the oversight mechanisms and how might citizens be assured that environmental controls are adhered to? This uncertainty leaves too much risk involved to the river, the fish and the public trust.
5. The proposal needs to have safeguards and built-in assurances that *no willow trees will be damaged*. Specifically, any willows that interact with the river

channel need to be retained. In addition other riparian vegetation will need to be replaced and enhanced at the completion of this project.

6. We feel that it would also be appropriate as the whitewater park is developed, to place kiosks and signage to educate the public on the aquatic ecology, and natural history of the redband trout and appropriate and respectful treatment of nature and the river. Additionally, other mitigation measures that enhance wild and native trout populations will need to be considered if this project proceeds.
7. Last, SFTU feels it is appropriate to establish which parties will maintain the whitewater structure. During high runoff when the river flows exceed 20,000 cfs it is not uncommon to see pallets, stumps, logs and other debris catching in any structures that are in the river channel. Are there plans to pull these kinds of debris out of the fish passage channel if they lodge there? What if significant shifting occurs and repairs are needed to the drop structure? Who pays for these and how is this work done in the river channel in a way that will not harm trout?

We must also ask if careful consideration to other locations was given for the white water park? SFTU would like to see the documentation that other, less sensitive areas were considered. Has the city considered a closed pump system in River Front Park? This location would be well suited for an audience, fits in with the park mission, its on the river with a ready source of water and presents virtually no risk to fish or wildlife. Other cities such as Charlotte, NC have gone this route and been very successful.

Again, we appreciate the city and their partners for thinking in terms of river recreation, but the ongoing open-ended uncertainty of impacts to wild trout (and whitefish) prevents us from supporting the project as planned. More science needs to be conducted so that we understand the impacts of this proposal on the Spokane River's native and wild trout and whitefish populations.

Thanks for the opportunity to comment on this project. If you have any questions please feel free to call me at (509) 838-8688.

Sincerely,

Harvey Morrison  
President, Spokane Falls Trout Unlimited

