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Upper Columbia River Group

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June 26, 2009

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

E-mail tpalmquist@spokanecity.org

Re: Spokane Whitewater Park CUP Application & SEPA Checklist
Application No. Z2008-084-SCUP

Dear Spokane Planning Department:

The following are comments on the proposed whitewater park. Sierra Club's Upper Columbia River Group is located in northeastern Washington and the Idaho Panhandle. Sierra Club is America's oldest and largest grassroots environmental organization with 1.3 million members. Sierra Club's mission is to explore, enjoy, and protect the planet.

In 1907, fifteen years after John Muir and others founded Sierra Club, the newly created Spokane Park Board hired the nation's premier landscape architects, the Olmsted Brothers, to prepare a detailed, written report with accompanying maps completed in 1908 and published in 1913 by the Board of Park Commissioners. The Olmsted Report proposed parks and connecting boulevards. As Spokane historic preservation consultant Sally Reynolds has written, "the significance of the Olmsted report on guiding major land use decisions in Spokane cannot be underestimated."

The Olmsted's were especially enthusiastic about the Gorge Park:

Nothing is so firmly impressed on the mind of the visitor to Spokane, as regards its appearance, as the great gorge into which the river falls near the center of the city. It is a tremendous feature of the landscape and one which is rarer in a large city than river, lake, bay or mountain. Any city should prize and preserve its great landscape features, inasmuch as they give it individuality. Chicago has spent millions for its Lake Shore parks. New York has spent more millions on its great Riverside Park and Drive extending for many miles along the Hudson River. Many instances could be enumerated showing that the wisdom of preserving such landscape features has been recognized and acted upon by making them enjoyably accessible by laying out parks and parkways along them.

A century ago (and a century after the Lewis and Clark expedition) when the Olmsteds would have first gazed upon the Gorge, the Spokane River still teemed with returning salmon. In "River of Kings" reporter Jim Kershner wrote of this fishery, "The Spokane River spawned the biggest of the big salmon, summer chinooks (kings) that were commonly 50 to 80 pounds. The Spokane River was one of the most productive salmon streams in the entire Columbia system. The summer fishing camps at Spokane Falls were famous among many tribes, even tribes from far away. The total number of salmon running up the Spokane probably approached a million annually, of which about 300,000 were harvested by the Spokane tribe and other tribes." (*Spokesman-Review*, August 31, 1995)

Although the Spokane River Gorge remains a place of beauty, much has changed with the Spokane River itself. Dams extirpated the fabled salmon runs. Pollutants – mine wastes, organochlorines (including PCBs and PBDEs), phosphorus and even occasional spurts of raw sewage – have polluted the Spokane River. Since 1891 the Monroe Street gage has documented the downward slide of river flows – documenting the dewatering of a river by overpumping the Aquifer and impounding water upstream.

The Spokane River's trout fishery was the subject of Spokane's first major environmental controversy, as noted by historian William Youngs,

For a brief time the frontier town was a trout-fishing mecca and sportsmen came from far away to stay in little hotels by the falls and fish. The first environmental debate in Spokane erupted during the 1880s when sportsmen alleged (correctly) that sawdust from the lumber mills, newly built along the falls, was harming the trout and the profitable fishing business. For a brief period the courts sided with the sportsmen and closed the mills. ('Comments on Spokane Falls', May 28, 2008)

Over the years and despite the accumulating environmental insults, the river's fishery of redband trout has managed to survive and, until recent years, flourish. These fish support a unique urban fishery, and remain a connection with the River and the past. These fish are also a "canary in the coal mine" – a biologic indicator for the health of the Spokane River.

Redband trout populations are plummeting in the Spokane River. Unless this trend is reversed, these fish will continue their downward slide toward extinction. Fishery biologists with the Washington Department of Fish and Wildlife have identified the Spokane River Gorge as important habitat for redband trout. (see, for example, WDFW letter to Shorelines team regarding Redband Trout, Dec 13, 2006; and WDFW SEPA comments on the proposed whitewater park, May 1, 2009).

Sierra Club and CELP have concluded a settlement with Avista regarding relicensing of Spokane River dams. Our settlement is now part of the federal license for these dams. The federal license requires intensive assessment and monitoring of trout

habitat in the vicinity of the whitewater park, along with a restoration plan. We are concerned about Avista's ability to obtain baseline data and improve habitat in this reach of the Spokane River while potential detrimental impacts associated with the whitewater park are just getting underway. We request that these processes be coordinated.

We also request that, should the Avista study show that the whitewater park supports spawning, rearing and migration areas for redband trout, that CUP conditions require park closure at appropriate times to protect fisheries.

In conclusion, the Spokane River is a river of history, suffering from profound environmental impacts. In protecting and restoring the Spokane River to health, the proposed whitewater park may help connect more people to the river through whitewater experiences. But the whitewater park needs to be located, engineered, built, maintained, monitored, and funded over the years in a way that does not harm the struggling redband trout populations. If harm to the fishery is anticipated or found to occur, then adequate mitigation for that harm needs to be provided to avoid more environmental damage to the Spokane River.

Sincerely,

A handwritten signature in cursive script that reads "John Osborn".

John Osborn, MD, chair
Upper Columbia River Group