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DEPARTMENT OF ECOLOGY

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REGISTRATION

March 22, 1993

Mr. Chuck Ahlrichs
STS Hydropower, Ltd.
22525 S.E. 64th Place
Issaquah, WA 98027

Dear Mr. Ahlrichs:

Re: Heislars Creek Hydroelectric Project, FERC No. 10824
Comments on 3/17/93 Site Visit

Thank you for the opportunity to meet with you and Dan Haas of the National Park Service at the project site for the proposed Heislars Creek Hydroproject (FERC No. 10824). This letter is to confirm and elaborate upon my comments made at the site.

The purpose of the visit was to better ascertain whether the proposed bypass reach of the project was suitable for whitewater kayaking and, if so, whether further evaluation of whitewater suitability, instream flow for recreation, and public access provisions would be warranted. Based upon my observations, I conclude that further investigation is warranted.

The proposed project would use and modify an existing diversion structure on the Middle Fork Nooksack River (RM 7.2), which diverts water primarily for municipal supply to the City of Bellingham. This structure is located at the entrance to a steep-walled gorge, through which the river narrows and increases considerably in turbulence and velocity. Since it was impossible to walk down the gorge, we walked along the south ridge and observed the river wherever possible. At each viewpoint, the river appeared suitable, albeit challenging, for kayaking. We did not identify any barriers to boat passage. Once a boater entered the gorge, there would be no exit until it opened up downstream (less than one mile). I observed few eddies, which would further elevate the risk posed to a boater. However, everything we viewed was clearly within the capacity of a competent boater.

The existing diversion represents an excellent location for a put-in point. Some minor construction (e.g., stairway or pathway) would be required.

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While the bypass reach appears suitable for kayaking, important questions remain. We don't know how suitable the reach is, or how worthwhile the experience would be. The gorge is limited in length, and by itself (that is, not taking into consideration the river below the powerhouse site) would offer a short trip. The bypass reach of your proposed project is two miles. But taking into consideration that the river continues downstream for a lengthy distance (from the proposed powerhouse site, it's five miles to the confluence with the Nooksack River), it could perhaps serve as the put-in point for a trip that extended far beyond the project reach. In addition, a put-in point may exist upstream where the Forest Service road crosses the river shortly upstream of the mouth of Clearwater Creek, although I do not know whether the Middle Fork Nooksack River is suitable for watercraft use at this point.

We also don't know under what range of flows kayaking (and other possible water-craft uses) would be safe and enjoyable. I propose we pursue these questions in the following manner:

- 1) We need to verify the suitability and worth of the reach for whitewater recreation from an experienced kayaker(s). At our site visit, Dan Haas of the National Park Service suggested he would contact a representative of the American Whitewater Affiliation for information on Washington State contacts. I have enclosed information related to two Washington State river recreation clubs, the Washington Kayak Club and the Association of Washington Recreational River Runners. You or your consultant may wish to contact them for volunteers. A quick, preliminary assessment should be sufficient to determine whether further evaluation is merited.

- 2) If the reach is deemed suitable, our attention can then turn to the question of what instream flow is needed to provide a quality experience. Since the existing diversion does not offer the possibility of effectively controlling flow levels, this assessment will have to take place over a period sufficient to evaluate a full range of flow levels. I would recommend that you contract with a person or firm experienced in undertaking recreational surveys or Delphi-type processes (group consensus). A group consensus approach would probably be more practical in this instance, given the apparently nonexistent current level of use.

Because the only viewpoints to the bypass reach are at 1) the Mosquito Lake Bridge downstream of the possible powerhouse sites (at which point all water would be returned to the river) and 2) the existing diversion (to which there is currently no public access), there is no need to

Mr. Chuck Ahlrichs

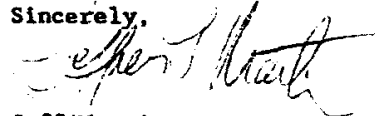
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conduct a formal preference study to evaluate instream flow and aesthetics. The only other viewpoint would be on the river itself, and water sufficient for whitewater use would presumably also be sufficient for aesthetic values, if not in excess thereof.

I appreciated the site visit to discuss these issues and the opportunity to submit these comments. If you have any questions, please contact me at (206) 493-9562.

Sincerely,



Jeff Marti
Water Resources Program

JM:km
Enclosures

cc: Lois Cashell, FERC
Dan Haas, National Park Service
Steve Starlund, State Parks and Recreation
Jeff Frost, Interagency Committee for Outdoor Recreation
Steve Hirschey, NWRO Water Resources
John Glynn, NWRO Water Quality
Hedia Adelsman/Jim Bucknell, Water Resources