

From: [George Wooten](#)
To: [SEPADesk2 \(DFW\)](#)
Cc: [Roberts, Tara \(ECY\)](#); [Walther, Martin \(ECY\)](#); [Dave Wertz](#)
Subject: DNS 16-060: WENNER LAKE/BENSON CREEK IRRIGATION REPAIR
Date: Saturday, October 08, 2016 10:11:22 AM
Attachments: [Wenner-Lakes-CNW-comments-2016-10-07.pdf](#)
[Benson hydrol model rpt_Ecy 15-11-002.pdf](#)

Dear Sirs:

Please accept the following attached comments on behalf of Conservation Northwest concerning the Wenner Lakes Dam Repair project DNS referred to in the subject line above.

Sincerely,

George Wooten
Conservation Northwest Associate
509-997-6010



Date: October 7, 2016

From: George Wooten
Conservation Northwest
226 West Second Ave.
Twisp, WA 98856

To: Email: SEPAdesk2@dfw.wa.gov
OR
http://wdfw.wa.gov/licensing/sepa/sepa_comment_docs.html
cc: tara.roberts@ecy.wa.gov
martin.walther@ecy.wa.gov

Re: DNS 16-060: WENNER LAKE/BENSON CREEK IRRIGATION REPAIR

Please accept these comments on the above DNS proposed by Jerome Thiel. These comments are submitted on behalf of thousands of Conservation Northwest members, and follow from our earlier comments from a year ago.

Our comments asked several things:

1. Cost should be a consideration. The dams should not be rebuilt because it does not provide much benefit to taxpayers. The dams are on private land, but the lakes are only partly owned by WDFW. The upper dam with the public access, was not deep enough to allow good fishing and the visitor area was too small for recreation.
2. The dams should not be rebuilt with state money because there is a risk of dam failure occurring again.
3. The area should be restored to its historical condition which is a wetland.
4. Cattle should be excluded from the wetland or lake area in either case.

We are still concerned that the SEPA Checklist does not address number 2.

Also, it has never been clear is what the purpose of this project is? Question number one asks whether taxpayer money is being used to subsidize an irrigation company or are there other benefits to the public, but it is still not answered.

We are aware of a small public access point that existed for fishing on the upper dam before the dams failed, but the fishing was not very good, the water was shallow with lots of emergent willows, there were lots of logs and the lake was not very cold or favorable for trout. The inlet was heavily degraded as a cattle grazing area and the water was polluted. The proposal sounds like you want to restore the area to these same poor conditions. We suggested then and now that appropriate restoration would be to restore the area to its natural condition as a wetland.

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While we still do not favor rebuilding the dams, we appreciate that you at least plan to use a JARPA that involves Army Corps Section 404 Permit, Okanogan County Shorelines Permit, and WDFW Hydraulics Permit for rebuilding the dam. In addition, we are forwarding our comments to Ecology.

Since our original correspondence new information has come forward indicating that the area may be prone to more frequent flooding than the report that was provided by the post-fire flood assessment (see attachment by Martin Walther (2015). Dam Safety Incident Report - Computerized Rainfall-Runoff Model for Benson Creek, Benson Creek Flood, August 2014. DSO Files OK 48-0320, -0308, -0328. Washington Department of Ecology Publication Number: 15-11-002.)

The Walther document indicated that the cause of the failure of the Wenner Lakes Dams is still not completely understood and awaiting a future report. It would be remiss to rebuild the dams until better information is available.

Below we provide two additional pieces of information that may contribute toward understanding the cause of failure, which is nonetheless still lacking from the Checklist:

1. Better information includes locally available information on the hydrology of Finley Canyon. Local residents are aware that even prior to the fires, Finley Canyon would sometimes grow a five-foot deep lake during mid-August, the hottest and driest part of the year, in a depression that is dry most of the spring. The rapid creation of this five acre lake must involve a tremendous flow of groundwater that may not be accounted for in restoring the dams. The appearance of the lake during summer indicates that it is probably delayed recharge from a larger or distant catchment. The presence of this large quantity of groundwater indicates that there is no need to have lakes to supply irrigation water, as there is an adequate supply in the groundwater. Before and after photos are attached at the end of this letter as Figures 1 and 2.

In addition, the second version of the Checklist still fails to mention this groundwater or the presence of wetlands.

2. John Alexios, who lives next to the dams, informed me of indications that the dams may have flooded out or even been breached more than once since being built. Mr. Alexios' property is at the outlet of Finley Canyon below the dams, where the canyon enters Benson Creek.

Mr. Alexios, whose home burned down in the Carlton Complex fire, explained that when he was excavating below the foundation of his former home, he found a barbed wire fence several feet below the ground. This fence must have been buried by flooding before he built his home. This also makes sense considering that the outlet channel for Finley Canyon was partly buried before the fire and flooding of 2014. One has to wonder whether this project will simply return the site to its former condition or even be at risk of future flooding.

If the project had more clear objectives, and indicated why or whether taxpayer funds are being spent appropriately we could provide more positive comments.

Thank you for your consideration.

Sincerely,





Figure 1. Photo of new lake in Finley Canyon taken in late August or early September, 2011. Photo by George Wooten for Western Gray Squirrel study. The same road was driven about two weeks earlier and the area where the road goes underwater was bone dry.



Figure 2. Photo of same lake as Figure 1 on the same date.