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U.S. Bureau of Reclamation  
Columbia-Cascades Area Office  
1917 Marsh Road  
Yakima, WA 98901-2058

Attention: Ms. Candace McKinley, Environmental Program Manager

Subject: Kachess Drought Relief Pumping Plant and  
Keechelus-to-Kachess Conveyance  
(KDRPP/KKC) Projects DEIS - Comments

We support the proposed Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). WSDOT recognizes the importance of agriculture and vitality of the aquatic habitat for fish. We have reviewed the Draft Environmental Impact Statement (DEIS) for the proposed projects and have the following comments.

- Interstate 90 (I-90), including the ramps, is a fully-controlled limited access interstate, signed by a variable speed limit controller, with a maximum speed limit of 65 MPH. No direct access to I-90 will be allowed. Access to either side of the interstate shall be from interchanges only. WSDOT has heavy construction activities planned for the segment of I-90 between Keechelus Lake and the Cabin Creek Interchange well into 2020. These activities will include traffic control. To minimize construction activity conflicts between the interstate projects and the conveyance project, use of the existing USA Forest Service/Bureau of Reclamation access connection at Highway Engineer's Station L<sup>E</sup> 1507+00 (milepost 61, right) for construction purposes will not be allowed.
- It appears that the conveyance tunnel between Keechelus Reservoir and Kachess Reservoir for Alternatives 3A and 3B is proposed to cross I-90 in the vicinity of MP 61.5. The design of this segment of the I-90 corridor improvement project is complete and the project is currently out for advertisement, and construction is scheduled for completion in 2020. Of most concern to us is the location of the proposed tunnel crossing in relation to the planned Price Creek vicinity wildlife crossing and associated interstate improvements that will occur in this segment. WSDOT requests more detailed information on the crossing location, including a tunnel profile showing depth below surface and tunneling method considered under the interstate. WSDOT also requests information on how prevention of settlement to the interstate and its structures in the crossing vicinity will be achieved, including techniques that will be used to monitor settlement. WSDOT needs to ensure that settling and de-watering risks related to subsurface boring under I-90 structures are appropriately addressed. This area also contains a number of compensatory wetland and hydrology related mitigation features that can be sensitive to settling and de-watering changes. WSDOT needs to know how impacts to these features will be addressed. It is imperative that the conveyance project be coordinated with the I-90 corridor improvement project for construction timing and sequencing.



- The construction and operations of the new conveyance tunnel near I-90 has potential for indirect and cumulative impacts to the new Price Creek Wildlife Overcrossing being constructed as part of our project. WSDOT requires the assurance of the State Department of Ecology, Department of Fish and Wildlife, and the Department of Agriculture that the proposed conveyance project will not impact our investments in wildlife connectivity and hydraulic connectivity between Keechelus Dam and Exit 62.
- The proposed portal for Alternative 3B is within an important WSDOT stockpile site at the Exit 62/Stampede Pass Interchange. WSDOT has held a Special Use Permit from the Okanogan-Wenatchee National Forest for over twenty years and the site is strategically important to WSDOT for highway maintenance and construction work. Currently the site is under contractual obligations with the I-90 Phase 1C contractor until at least 2020. Due to the limitations of available stockpile locations near I-90, WSDOT has made substantial financial investments into this site related to wetland and stormwater restoration and anticipate investing further in this site for future projects by keeping the permit active beyond 2020. WSDOT is currently in the design phase for additional improvements for I-90 near the Stampede Pass Exit 62 and subsurface settling and de-watering risks will be important to understand for those design efforts currently underway. Depending on additional details about the proposed work, the 3B portal location may have a substantial impact on current and planned construction and operational obligations for WSDOT. WSDOT would like the proponent to seek an alternate location for the 3B portal or work with WSDOT to find a workable solution to avoid impacts to this site. If an alternate location for the 3B portal is not feasible, and the portal is constructed at this site, WSDOT will require reimbursement for impacts to this site since it will be permanently impacted. Any staging activities planned for this site must not impact WSDOT contractors and maintenance crews at this location. WSDOT strongly favors the 3A alignment, as this proposal has fewer impacts to our investments.
- WSDOT needs to better understand how the proposed work near Gold Creek may affect the I-90 Gold Creek Bridges and upstream wetland mitigation and preservation sites owned by WSDOT and other project partners. WSDOT is under Clean Water Act 404 and 401 permits that require that established mitigation sites are protected in perpetuity. We support additional restoration in this area but need to ensure that proposed changes do not negatively impact restoration efforts and improvement investments we have in place in the area.
- The Price Creek Sno-Park referenced in the DEIS is officially called the "Price Creek Interim Sno-Park". It was originally constructed as a highway rest area but was never fully built out as a rest area. WSDOT and FHWA have allowed the site to be used as an interim sno-park to accommodate the recreational community on Snoqualmie Pass. On page 3-135, Table 3-32 of the DEIS, the table does not identify the plans WSDOT has for the Price Creek Interim Sno-Park and Interim Rest Area. Both sites will be permanently closed in 2015 to allow for the new Price Creek wildlife overcrossing and compensatory mitigation required for the project. They will, however, be used by contractors for staging, stockpiling and detour roadways.
- Kachess River changes – WSDOT needs to better understand what hydraulic changes can be expected to the Kachess River baseline conditions downstream of Kachess Dam. Changes to hydrology can affect the structural and operational needs of I-90 near the Kachess River.

WSDOT is also looking into future improvements to I-90 to the Kachess River bridges over the river and would like to better understand if expected changes to hydrology could affect the designs of the proposed improvements.

- Any utility line that crosses WSDOT rights-of-way requires a crossing permit for all locations crossing the interstate. The proponent must contact the South Central Region Utilities Engineer, Jamil Anabtawi, to coordinate this work and obtain the crossing permit(s). He can be reached at (509) 577-1785. No open cutting of the interstate will be allowed to cross the interstate.
- The Exit 62, Stampede Pass interchange is located within the next phase of the I-90 corridor improvement project, which is the segment from Exit 62, Stampede Pass interchange to Exit 63, Cabin Creek interchange. The proponent should anticipate that access to both interchanges will be compromised some time after 2020, during the construction of that phase. Priority for use of the interchanges will be given to WSDOT and their contractors working in the corridor. Currently, Stampede Pass is restricted to one lane, as a result of damages to several girders on the bridge.
- The crossing of I-90 with the conveyance tunnel will require FHWA approval to enter the interstate right-of-way. The proponent is required to submit a written request to WSDOT for approval. Please contact Rick Holmstrom at (509) 577-1633 for specifics.
- All loads transported on WSDOT rights-of-way must be within the legal size and load limits, or have a valid oversize and/or overweight permit.
- It is the applicant's responsibility to keep and maintain I-90, including the interchanges, free of any of their debris. Any spilled material shall be promptly cleaned up at the applicant's expense.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding our comments, please contact me at (509) 577-1630.

Sincerely,



Paul Gonseth, P.E.

Planning Engineer

PG: rh/mls

cc: File #1, I-90  
Bill Sauriol, Environmental Program Manager  
Jamil Anabtawi, Utilities Engineer  
Scott Golbek, Construction Project Engineer  
Brian White, Assistant Regional Administrator  
Terry Kukes, Area 1 Maintenance Superintendent