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Independent External Peer Review of the Bluestone Dam, Summers County, WV Draft Dam Safety Modification Report

Addendum to the Final Report

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1 Introduction

1.1 Introduction and Report Overview

This addendum is a supplement to the Final Independent External Peer Review (IEPR) Report[1] for the Draft Dam Safety Modification Report (DSMR) for the Bluestone Dam[2] located on the New River in Summers County, Hinton, WV. Although the scope of the original review included the Panel's IEPR of the Bluestone Dam Supplementary Draft Environmental Impact Statement (SDEIS)[3], it did not include a Panel review of public comments, which were received subsequent to the publication of the IEPR report. This addendum documents the results of the Panel's review of the public comments on the SDEIS.

The addendum contains three additional Final Panel Comments (FPCs) (presented in Section 3) and briefly details the IEPR process that determined the need for, and led to the generation of, these comments. The FPCs in this addendum are numbered FPC #34, #35, and #36, continuing the FPC numbering used in the Bluestone Dam IEPR Final Report, which stopped at FPC #33.

1.2 IEPR Management Team

A panel of independent experts performed this IEPR under the auspices of Analysis Planning and Management Institute (APMI) as a subcontractor to the Logistics Management Institute (LMI), collectively referred to as the Outside Eligible Organization (OEO). Both organizations are not-for-profit science and technology entities that provide impartial, independent assistance, free of conflict of interest (COI), to Federal Government organizations. Neither of these organizations has performed or advocated for or against any federal water resources projects or has real or perceived COI for conducting IEPRs. LMI, APMI, and the Panel Members for this IEPR have not been involved in any capacity with the projects documented in the Bluestone Dam Draft DSMR. For this IEPR, both organizations are free from COI with the U.S. Army Corps of Engineers (USACE).

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1 "*Independent External Peer Review of the Bluestone Dam, Summers County, WV, Draft Dam Safety Modification Report, Final Report*", Prepared by: Analysis Planning and Management Institute & Logistics Management Institute, Ref: TR-2016-COE-009, 2016-10-31.

2 "*Bluestone Dam, Dam Safety Assurance Mega-Project, Draft Dam Safety Modification Report (DSMR), Supplement to the 1998 Dam Safety Assurance Report, ATR, HQ, MSC, DSMMCX, RMC, and QCC Submittal*", USACE, Huntington District, Great Lakes & Ohio River Division, NID ID: WV08902, 2016-09-01.

3 "*Supplemental Draft Environmental Impact Statement, Bluestone Dam Safety Modification, Hinton, West Virginia, Volume I*", USACE, Huntington District, 2016-09-01.

2 Independent External Peer Review Process

This section summarizes the activities associated with the review of the public comments conducted for this project.

The USACE received 14 comment submittals from various state and federal agencies, non-governmental organizations, tribes, and members of the general public. Based on a review of the comments received, 23 comments were deemed applicable to the Panel's scientific and technical charge.

The OEO received all comments for the Panel to review. In accordance with procedures described in the Department of the Army, USACE, Engineer Circular (EC) Civil Works Review (EC 1165-2-214)[1], Appendix D, APMI focused the IEPR Panel's public comment review on assessing scientific and technical issues with regard to the assumptions, data, methods, and models used in the project. The OEO received electronic versions of the public comments from USACE, being informed that no further comments were received at the end of the comment period on 30 November 2016. The OEO reviewed the comments and then provided them in their original, full-text format to the Panel Members.

Each Panel Member was asked to independently determine whether the public comments contained any additional scientific or technical concerns regarding the project which were not previously identified and which should be addressed by USACE in the Bluestone Dam DSMR project documents. The Panel was charged with focusing on scientific and technical issues and not policy-related comments, per EC 1165-2-214, Appendix D.

The Bluestone Dam IEPR Panel Members received the last of the public and agency comments from the OEO on 2 December 2016. The Bluestone Dam IEPR Panel Members reviewed five comment letters from state and federal agencies as well as three letters from non-profit organizations and tribal groups and six comment cards from members of the general public. The Bluestone Dam IEPR Panel Members did not have a specific charge question with regard to the public comments but, rather, a general charge stating:

> *"The Review Panel can use all available information to determine what scientific and technical issues related to the decision document may be important to raise to decision makers. This includes comments received from agencies and the public as part of the public review process."*

The Panel Members reviewed the public comments and generated questions associated with their charge. The OEO reviewed these questions, forwarded them to the USACE, and then hosted a meeting between the Panel, the USACE, and the OEO to resolve the questions and ensure a clear understanding of technical issues. Prior to the meeting, the USACE provided written responses to the questions, facilitating this effort.

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[1] Engineering Circular (EC) 1165-2-214, "*Water Resources Policies and Authorities: Civil Works Review*", USACE, 2012-12-15.

The Panel Members submitted an initial draft of their comments in response to the IEPR charge, and the OEO reviewed the draft to identify any issues, areas of potential conflict, and other overall impressions. Each Panel Member's individual draft comments were shared with the full Panel for feedback, as well as to determine if any of the issues identified should be carried forward as FPCs.

Based on the Panel's review, some of the public comments were outside the scope of this study. However, by the end of the review, the Panel Members identified two specific issues and one general finding within the public comments that needed additional clarifying information to strengthen the Bluestone Dam SDEIS. Each issue and the general finding were addressed as their own FPC to make it easier for USACE to evaluate and respond to the comment.

Some concerns noted by the public paralleled the Panel's concerns identified during the IEPR of the Bluestone Dam DSMR and documented in previous FPCs. The Panel did not repeat those concerns verbatim, but did note that some aspects of the comments overlap.

All Panel Members reviewed and provided input on the issues discussed in FPCs #34, #35, and #36 (presented in Section 3 of this addendum). The OEO prepared this addendum and conducted a final review and edit of these FPCs for clarity and consistency. There was no direct communication between the Panel and USACE during the review and preparation of the FPCs.

It is anticipated that the OEO will enter the FPCs into USACE's Design Review and Checking System (DrChecks), a web-based software system for documenting and sharing comments on reports and design documents, so that USACE can review and respond to them. The USACE will provide an Evaluator Response to these FPCs, and the Panel will respond via the so-called BackCheck process.

After the USACE final Evaluator Responses are submitted and entered into DrChecks, the OEO will meet with the Panel, as needed, to discuss USACE's responses and the approach for preparing the Panel's BackCheck responses. As part of the BackCheck process, the Panel will select either "Concur" or "Non-Concur" for each USACE final Evaluator Response and provide comments (as needed) to indicate whether each response adequately addresses the Panel's identified concerns. APMI will enter the Panel's BackCheck responses to each USACE Evaluator Response into DrChecks.

3 Independent External Peer Review Findings

The Panel has conducted an in-depth review of the proposed Bluestone DSMR regarding the economic, engineering, and environmental methods, models, and analyses considerations. The Panel previously provided 33 comments in the Final IEPR Report, published in October 2016.

There were three comments provided by the Panel on the public comments, all identified as Medium significance. The following section provides a summary of the Panel's findings on the review of the public comments.

3.1 Summary

The Panel concurs with most of the verbal responses provided by the USACE during the Midpoint Meeting held for this Addendum. It was helpful to the Panel to hear that the USACE has already held meetings with several government agencies and organizations, after the receipt of their comments, to discuss and better understand the comments and concerns, in order to resolve them. The Panel recommends that the USACE continue maintaining a dialogue with other stakeholders, such as individuals or smaller municipalities, to ensure a clear understanding of the issues and to resolve the comments.

The Panel also makes note of specific concerns expressed by several organizations and agencies, particularly the New River Conservancy (NRC) and the U.S. Environmental Protection Agency (USEPA) regarding potential environmental impacts due to increased frequency and duration of upstream inundation. In addition, the USEPA noted potential impacts to wetland resources in comments that are consistent with Comment 7 previously made by the IEPR Panel. Therefore, the Panel recommends that the public comments be substantively addressed in the SDEIS to include more recent monitoring, management, and mitigation planning as described by the USACE in the 19 January 2017 Public Comment Addendum Midpoint Meeting. Further, the Panel notes USEPA's comments regarding potential environmental impacts to downstream Category 1 habitat, including benthic populations, and acknowledges that while some steps taken by the USACE are positive in reducing those impacts, it remains unclear whether the extent of the impacts has been fully identified. Specifically, the USACE cites a 2011 mussel survey, which may not be sufficiently informative since the limit of the field study was very close to the spillway discharge and the results may not be properly extrapolated to the reaches further downstream, potentially underestimating the population of the mussels outside the turbulent area of the spillway. Finally, the Panel notes USEPA's comments regarding potential environmental impacts to biologic communities resulting from the duration of the project activities. The Panel recommends establishing clear, measurable metrics for aquatic habitat restoration within the Category 1 habitat, including monitoring and adaptive management plans in the event the habitat does not return to preconstruction conditions on its own.

3.2 Final Panel Comments

This section presents the full text of FPCs #34, #35, and #36 related to the Panel's review of the public comment for the Bluestone Dam IEPR.

Panel Comment #34: Medium
(Discipline: Biological Resources and Environmental Law Compliance)

Public comments regarding potential environmental impacts due to increased frequency and duration of upstream inundation suggest substantive concerns that need to be better addressed in the SDEIS.

Basis for Comment

Public comments from the New River Conservancy (NRC) and the US Environmental Protection Agency (USEPA) appear to raise concerns regarding upstream inundation that may merit additional consideration.

In their letter dated 17 October 2016, the NRC noted:

- Fifth paragraph, page 1, "*In Volume I of the SDEIS, Table 3-2 in section 3-23 lists a 2% annual exceedance probability for a pool elevation of 1509.8 feet for the duration of the TSP, which corresponds to a 16-20% exceedance probability over the expected 8 to 10-year project period. If such an event were to occur, the resulting flood pool has potential to inundate portions of Glen Lyn, Virginia, threatening a coal ash storage pond along US-460, as well as the Glen Lyn Town Park and Campground, constructed upon fly ash fill. The potential for contamination resulting from inundation of coal ash storage represents a severe threat to human and ecosystem health downstream. The NRC strongly recommends that flooding risks to Glen Lyn during construction of the TSP be evaluated, and, if deemed necessary, that strategies are prepared to prevent coal ash from entering the river during extremely high flow events.*"

  The NRC comment regarding inundation at Glen Lyn, Virginia, and potential water quality impacts appears to be a reasonable concern that merits additional consideration. It is not clear to the Panel whether this specific concern has been considered and/or whether additional precautions may need to be taken to avoid threats to water quality from upstream sources during the construction period as described by the commenter.

- First paragraph, page 2, "*The NRC suggests that the heightened risks of inundation and siltation to threatened and endangered species upstream of the Bluestone Dam should be further evaluated. As listed in in* [sic] *the US Fish and Wildlife Service documents in Appendix H of the SDEIS, the federally threatened Virginia Spiraea is known to be present along the Bluestone River in Mercer County and faces increased risk of disturbance from inundation during the TSP construction period. The federally endangered Running Buffalo Clover may also experience an increased risk of disturbance during the project. According to West Virginia Division of Natural Resources modeling, suitable habitat for the species is present upstream of the dam. It is possible that occurrences along the river could be disturbed or extirpated by prolonged inundation.*"

  The concern regarding impacts to upstream biologic communities, including endangered species mirrors a comment posed by the IEPR Panel. It also appears to be reiterated by the USEPA in their public comments (Comments 4 and 6).

In their letter dated 27 October 2016, the USEPA noted:

> USEPA Comment 4: "*The SDEIS discusses that areas upstream of the dam are likely to undergo more frequent inundation due to the proposed construction, likely to impact less water tolerant species. Though tree replacement at the end of the construction period is mentioned, please consider mitigation for interim degradation of habitat. Consideration may be given to any resource enhancements that may be possible in the study area or subwatershed*."
>
> This comment seems to reiterate the need for additional consideration of impacts and potential mitigation for unavoidable impacts to upstream communities, consistent with comments also made by the NRC, as noted above. The Panel agrees that additional, substantive consideration may be warranted. In the Planning Aid Letter dated March 2014, the U.S. Fish and Wildlife Service (USFWS) notes:
>
> "*Riparian areas and wetlands occur at the interface between land and water. Collectively these areas represent only a small proportion of the landscape in the study area. However, their hydrologic and ecological importance is very significant. Collectively, these areas provide many critical functions including water supply, maintenance of water quality, flood attenuation, essential habitats for flora and fauna, and maintenance of biodiversity*."
>
> It is plausible that the impacts to these biologic communities may have additional indirect and cumulative effects, including alteration and simplification of biologic communities over time, and subsequent impacts to recreational and economic resources (i.e., fishing, tourism, etc.). Overall, this implies that more substantive consideration and/or discussion in the Supplemental Draft Environmental Impact Statement (SDEIS) regarding unavoidable impacts to these upstream communities and subsequent mitigation is advisable.

- USEPA Comment 6: "*Impacts to wetlands are suggested in the SDEIS to be possible. No mitigation is proposed. It is recommended that monitoring of conditions take place and if resource degradation occurs (due to inundation or siltation), mitigation be considered*."

  This comment is consistent with IEPR Panel comment #7. It should be noted that in their Planning Aid Letter (March 2014, page 9, PDF page 404), the USFWS refers to the statement, "*Instream wetlands, consisting of numerous emergent water willow (Justicia americana), stargrass (Heteranthera dubia), and pondweed (Potamogeton sp.) populations, also occupy the shallow water areas around forested islands, shorelines, and riffles*…", which makes note of the ecologic functions and importance of wetlands (as noted in the previous comment).

  During the Bluestone Dam IEPR DRAFT Project Deliver Team (PDT) Response Meeting on 7 December 2016, the USACE indicated that mitigation for some wetland resources (i.e., emergent vegetated wetlands in the tailwater area) would occur under the overall mitigation for aquatic resources, but it is not clear whether this would include unavoidable impacts to all wetland resources, including those upstream.

The USACE has suggested, in its responses to Panel comments and in the 19 January 2017 Public Comment Addendum Midpoint Meeting, that these issues are being considered more thoroughly than currently addressed in the SDEIS. They have cited regulations applicable to fly ash disposal sites, and

noted additional coordination, field surveys, and monitoring/adaptive management as it applies to upstream biologic communities that would help address these concerns.

Significance: Medium

The above-noted public comments on the project identify potential deficiencies with the SDEIS, which, if not substantively addressed, would affect the completeness or overall understanding of the recommendation or justification of the project.

Recommendation for Resolution

The Panel has the following recommendation(s) related to this comment:

1. Public comments, as noted above, should be carefully considered, and revisions to the SDEIS made as warranted, perhaps including information noted by the USACE to the Panel during the 19 January 2017 Public Comment Addendum Midpoint Meeting.

Literature Cited:

- Memorandum, NRC to USACE, "*RE: Bluestone Dam Safety Modification Project, OMB Control Number 0704-0225*", George Santucci, President, New River Conservancy (www.NewRiverConservancy.Org), 2016-10-17 (2 pages)
- Memorandum, EPA to USACE, "*Re: Supplemental Draft Environmental Impact Statement (SDEIS) - Bluestone Dam Safety Modification, Hinton, West Virginia CEQ No. 20160205*", Barbara Rudnick, NEPA Team Leader, United States Environmental Protection Agency (EPA), Region III
- "*Final Planning Aid Letter Bluestone Dam Safety Project*", U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, West Virginia, March 2014, as included in: Draft DSMR Appendix H, USFWS Documents, *"Supplemental Draft Environmental Impact Statement, Bluestone Dam Safety Modification, Hinton, West Virginia, Volume III (Appendices H through L)"*, USACE, Huntington District, 2016-09-01

Panel Comment #35: Medium
(Discipline: Biological Resources and Environmental Law Compliance)

Public comments regarding potential environmental impacts to downstream Category 1 habitat suggest substantive concerns that may need to be better addressed in the Supplemental Draft Environmental Impact Statement (SDEIS).

Basis for Comment

In their letter dated 27 October 2016, the USEPA noted issues that reiterate concerns previously identified by the Panel, including impacts to native mussel populations and aquatic habitat:

- USEPA Comment 3: "*The US Fish and Wildlife Service (FWS) has defined the area just below the dam as a Resource Category I habitat because of the rare, irreplaceable, and highly suitable nature of the habitat for the conservation of species of interest. Placement of the cofferdams and rock causeway will impact the area's aquatic organisms including two mussel species listed as State Imperiled Species (Purple Wartyback (Cyclonais tuberculate) and Pistolgrip (Tritogonia verrucosa), in addition to aquatic macrophytes, benthic invertebrates, and crayfish. The dam safety modification project would directly impact 2.25 acres by cofferdam placement and 62.50 acres due to flow alterations adversely impacting this highly valued resource. Changes include potential higher velocities during low flows during construction and increase in dry conditions in the tailwater. EPA considers these impacts to be significant and is requesting that the Corps further investigate ways to minimize the impacts and to reduce the protracted construction period. EPA appreciates the mitigation being offered and identified with FWS for Category 1 habitat; any additional details on proposed mitigation should be included in the Final SEIS*."

  The Panel has similar concerns, including about impacts to native mussel populations, as noted in IEPR Panel Comment #6.

The USACE has suggested, in its responses to Panel comments and in the 19 January 2017 Public Comment Addendum Midpoint Meeting, that they are coordinating with the resource agencies to implement a new USACE-proposed diversion measure. This measure would further minimize the indirect impacts of the project downstream of the dam in the New River, potentially reducing the impacts to aquatic habitat from 51 HU to 9 HU (Habitat Units). The Panel agrees that steps to reduce impacts associated with construction activities in this habitat are advisable and in keeping with the Clean Water Act sequencing requirements to avoid, minimize, and mitigate.

Specifically regarding potential impacts to native mussel populations in the tailwater area, the Panel has reviewed the 2011 URS Corporation's Mussel Survey provided by the USACE. The Panel is concerned that the survey was somewhat limited in geographic scope, having been developed in relation to impacts associated with the 22 geotechnical borings proposed for scoping of the project rather than to determine impacts associated with the overall Bluestone Dam Phase 5 project impacts in the 62.5-acre tailwater area defined in the SDEIS. Consequently, the area sampled is relatively small, and confined to the area closest to the spillway, rather than sampling throughout the 62.5-acre downstream Category 1 habitat that is proposed for impacts in the SDEIS. The report notes:

"*Based on the proposed drilling locations, the survey extents were defined as the control weir as the upstream boundary and approximately 125yds downstream within the banks of the New River as the downstream boundary (Figure 1)*."

It is likely that the hydrology of the limited area sampled in the 2011 study differs somewhat from the overall 62.5-acre impact area described in the SDEIS. These issues potentially bias the data set. Consequently, it is possible that, once extrapolated to the entire impacted area, the survey results might

underestimate the overall population within the impacted area. Further, as the study was largely qualitative (rather than quantitative), the report does not predict an overall population size of the species identified for the disturbed area (either within the limited area associated with the 22 geotechnical borings targeted by the 2011 mussel survey, or within the 62.5-acre impact zone identified in the SDEIS), limiting the informative value of the mussel survey. Population estimates (density) are informative calculations, provided appropriate quantitative methodologies (i.e., quadrat samples, substrate removal techniques, etc.) are employed, and that the sample data are relatively well distributed within the targeted habitat. These data do not appear to meet these criteria, somewhat limiting the information they can provide regarding the population density of the noted species. That said, the Panel agrees that the development of habitability zones could provide a useful tool for determining impacts, but it is not clear that sufficient population data currently exist to determine the probable extent of those impacts.

Significance: Medium

The above-noted public comments associated with the project identify potential deficiencies with the SDEIS, which, if not substantively addressed would affect the completeness or overall understanding of the recommendation or justification of the project.

Recommendation for Resolution

The Panel has the following recommendation(s) related to this comment:

1. Public comments as noted above regarding the Category 1 habitat should be carefully considered, and revisions to the SDEIS made as warranted, perhaps noting the proposed diversion measure and updated impact calculation as noted in the 19 January 2017 Public Comment Addendum Midpoint Meeting.

Literature Cited:

- Memorandum, EPA to USACE, "*Re: Supplemental Draft Environmental Impact Statement (SDEIS) - Bluestone Dam Safety Modification, Hinton, West Virginia CEQ No. 20160205*", Barbara Rudnick, NEPA Team Leader, United States Environmental Protection Agency (EPA), Region III
- "*Final Report: Freshwater Mussel Survey, Bluestone Dam Tailwater on the New River, Summers County, Hinton, West Virginia*", Prepared for URS and the USACE by EnviroScience, Inc., September, 2011.

Panel Comment #36: Medium (Discipline: General)

The Panel has reviewed the public comment submittals and the responses provided to the Panel by the USACE to the questions raised by the public. The Panel wants to ensure that the responses provided by the USACE during the Midpoint Meeting to the Panel are conveyed to the public individuals or agencies that raised the questions, if they have not already been conveyed.

Basis for Comment

The public forums that were held by the USACE requested that comments to the Supplemental Draft Environmental Impact Statement (SDEIS) be provided as part of the public outreach process, according to the National Environmental Policy Act (NEPA) process. It is understood that since the time of the receipt of public comments, the USACE has held several meetings with various agencies and discussed some of the responses that were verbally provided to the Panel. It is also understood that the USACE plans to consolidate the individual comments into the updated SDEIS. The Panel encourages this because a number of the comments, in general, have scientific and technical significance, as discussed during the 19 January 2017 Public Comment Addendum Midpoint Meeting between the Panel and the USACE. Specific, noteworthy issues are included in separate comments, but the Panel wants to recommend that the USACE respond to the other public comments as was discussed and agreed to during the Midpoint Meeting.

Additionally, the Panel believes that the USACE should maintain a dialogue with stakeholders to provide the ability for clear communication of their concerns and an understanding of technical issues. Experience shows the value of this approach. Some of the public commenters will likely not have ready access to, or desire to, read the SDEIS update to find the response to their comments. Therefore, it is the position of the Panel that the USACE should reach out to those few individuals or small communities verbally or in writing, or in-person or public meetings, to discuss the response to their specific comments.

Significance: Medium

All the public comments, not only the purely scientific and technical ones, can provide insight into the project and they should be considered. In addition, the public (individuals, small communities, and agencies) that took the time to read, prepare, and submit comments to the SDEIS deserve a response to their questions. The verbal responses provided by the USACE to the Panel seem to do that effectively and other commenters could benefit from similar interactions. By holding meetings with the agencies, part of the responses have been completed, but the individuals and small communities would also benefit from similar interactions, instead of having to read an updated SDEIS to understand the resolution to their comments and concerns.

Recommendation for Resolution

The Panel has the following recommendation(s) related to this comment:

1. The USACE should provide written or verbal responses to each of the commenters who have not already been addressed in follow-up public or individual meetings, in addition to providing the updates and comments prepared in the updated environmental impact statement document.
2. Continue maintaining an open dialogue with the stakeholders during the remaining NEPA process.

Literature Cited:

- Supplemental Draft Environmental Impact Statement (SDEIS) – Public Comment Cards, Letters

Acronyms

Acronym	Definition
APMI	Analysis Planning and Management Institute, www.APM-Inst.Org
COI	Conflict of Interest
DrChecks	Design Review and Checking
DSMR	Dam Safety Modification Report
EC	Engineer Circular
EPA	Environmental Protection Agency
FWS	See USFWS
IEPR	Independent External Peer Review
LMI	Logistics Management Institute, www.LMI.Org
NEPA	National Environmental Policy Act
NRC	New River Conservancy, www.NewRiverConservancy.Org
OEO	Outside Eligible Organization
OMB	Office of Management and Budget
PDT	USACE District Project Deliver Team
SDEIS	Supplemental Draft Environmental Impact Statement
TSP	Tentatively Selected Plan
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
PAL	Planning Aid Letter
WRDA	Water Resources Development Act