

From: [Sutton, Loretta](#)
To: [NWS-Skagit-River-GI](#); [Hadley, Hannah F NWS](#)
Cc: [Allison O'Brien](#); [Lisa Treichel](#); [Roy Zipp](#); [Alan Schmierer](#); [NPS NOCA Superintendent](#); [NPS WASO EOD ExtRev](#)
Subject: [EXTERNAL] DOI Comments - USACE Skagit River Flood Risk Management
Date: Friday, July 18, 2014 1:25:58 PM
Attachments: [DOI Comments on USACE Skagit River DEIS.pdf](#)

Ms. Hadley,

This email transmits the U.S. Department of the Interior's (DOI) comments on the USACE's DEIS for the Skagit River Flood Risk Management General Investigation Study.

Thank you for the opportunity to provide comments.

Loretta Boldin Sutton
Team Leader, Natural Resources Management (Acting)
U.S. Department of the Interior
Office of Environmental Policy and Compliance (MS-2462)
1849 C Street NW
Washington, DC 20240
Tel: 202-208-7565
Fax: 202-208-6970
Email: Loretta_Sutton@ios.doi.gov



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240



9043.1
PEP/NRM

JUL 18 2014

ER 14/360

Ms. Hannah F. Hadley
U.S. Army Corps of Engineers
CENWS-EN-ER
P.O. Box 3755
Seattle, Washington 98124-3755

Dear Ms. Hadley:

The U.S. Department of the Interior (Department) has reviewed the U.S. Army Corps of Engineers (USACE) Draft Integrated Feasibility Report and Draft Environmental Impact Statement (DEIS) for the Skagit River Flood Risk Management General Investigation Study. We offer the following general and specific comments based upon the analysis, and areas of jurisdiction and special expertise of our National Park Service (NPS), and in consultation with other federal, state, and tribal stakeholders.

General Comments

The Department acknowledges that the USACE and Skagit County undertook a very complicated, costly, and socio-politically sensitive set of issues. However, we believe that the DEIS has missed the opportunity to take a broader, more holistic, and comprehensive approach to mitigating flood risks, given the 50 year planning horizon. We also believe that the DEIS disproportionately emphasizes structural flood control measures.

The Department believes that given the long range planning horizon, it is a fundamental shortcoming that the potential effects of climate change in relation to future flooding were not considered due to "uncertainty." We recommend that "uncertainty" be incorporated and not disregarded, especially given the potential risks to life and property should predictions prove valid.

The potential effects of climate change in regard to the nature and magnitude of hydrologic change likely to affect the Skagit River are very well modeled and documented. Notwithstanding the uncertainty, the effects of climate change on the hydrology of the Skagit River should have been carefully considered and incorporated into alternatives development given; (a) the very long planning horizon; and (b) the very real potential for enacting measures that may be insufficient and/or may encourage further development in areas where flood risks cannot be reasonably mitigated should climate change result in more serious future flooding, which is predicted. Adapting to climate change now, as opposed to 50 years from now, would be

far less costly and impactful to future generations. We believe that this oversight is a serious flaw to an otherwise reasonable impact analysis.

Specific Comments

During the USACE's scoping period our NPS expressed concern for adverse effects to the Wild and Scenic Skagit River, fisheries, recreation, and public access. To varying degrees the DEIS addresses each of these topics, and we appreciate that the USACE considered these concerns. We generally agree with the impact analysis on these topics, with the exception of potential effects to anadromous and resident fish.

Given the current adverse baseline, we are very concerned about further adverse effects in regard to potential impacts to the sockeye, steelhead, Chinook, bull trout, coho and coastal cutthroat trout stocks in the Baker River, which originates in the North Cascades National Park. As noted in the DEIS, existing flood control measures on the Skagit River, most notably levees, in addition to widespread development within the floodplain, have caused long-term adverse effects including loss of floodplain function; loss of riparian function, including streamside cover and nutrient input; loss of channel and stream bank complexity; lower rates of large woody debris recruitment, etc. These effects have occurred throughout the lower Skagit River, and combined with the effects of dams on the upper river have resulted in a reduction in quality and quantity of habitat for anadromous and resident fish.

We believe that the DEIS does not fully take into account the adverse impacts to the aforementioned fish stocks in Baker Lake and potentially underestimates the adverse effects that would result from maintaining lower lake levels for flood storage purposes. The Department asks that the USACE revisit their analysis of potential impacts to the Baker River sockeye fishery.

The Department believes that the mitigation measures for the adverse effects of flood control measures as described in the DEIS are too vague and conceptual. We urge the USACE and Skagit County to provide greater clarity as to specific mitigation measures that would be enacted. The Department further believes that offsite mitigation will be needed. There are several opportunities within the North Cascades NPS Complex to mitigate past impacts to the Skagit River and its tributaries, most notably in the vicinity of the confluence of Goodell Creek, and the Skagit River in Ross Lake National Recreation Area (both proposed for designation as wild and scenic). The Department is presently collaborating with the Upper Skagit Indian Tribe (USIT) on restoration options in this area as there are significant opportunities to restore lost riverine functions and fisheries habitat. We request the USACE consider these opportunities for mitigation in consultation with the NPS and the USIT.

Thank you for the opportunity to provide comments, and for your consideration of our important resources. If you have any questions regarding these comments, please contact Mr. Roy Zipp, NPS, Environmental Protection Specialist at (360)854-7313, or email (roy_zipp@nps.gov).

Sincerely,



Willie R. Taylor, Director
Office of Environmental Policy
and Compliance