



STATE OF
WASHINGTON

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Governor

DEPARTMENT OF FISHERIES

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June 27, 1979

Mr. R.P. Sellevold, P.E.
Chief, Engineering Division
Department of the Army
Seattle District Corps of Engineers
P.O. Box C-3755
Seattle, Washington 98124

Dear Mr. Sellevold:

The Washington Department of Fisheries appreciates the opportunity to review and comment on the U.S. Army Corps of Engineers' draft EIS on the Skagit River Levee and Channel Improvement Project. The Skagit River is the single largest producer of salmon in the Puget Sound region and the Department **is vitally interested in maintaining the present level of salmon production.** Basic to this is maintenance of existing spawning and rearing habitats. With these facts in mind, we have reviewed the EIS and our comments are as follows:


Skagit River, Washington - Summary

Page 1, 2a.

Description to fish and wildlife, such as loss of habitat, will be more than temporary.

Project Description

Page 3, paragraph 2 and Page 9, photo 1-4

Aggregate concrete blanket rather than riprap is proposed for the left bank at Mt. Vernon. **There must be compensation for loss of rearing habitat** (USFWS report to the Corps, Page 14, paragraph 2). 

Page 4, paragraph 1

Incorporation of fish passage design criteria at Fisher Slough is appreciated.

P005106

Page 7, paragraph 1

8.3 of the total 50 mile project length will be riprapped. Riprap was to be designed to provide fish habitat. This was not mentioned in the text and should be included.

Page 15, paragraph 1

The maintenance programs must be approved by all involved agencies. If parts of the program are not acceptable, there should be provision for alteration through mutual agreement. Operation and maintenance work within the river will require a hydraulics permit issued jointly by the Washington Departments of Fisheries and Game.

Environmental Setting Without the ProjectPage 34, paragraph 1

The Samish River and Samish Hatchery support an important commercial fishery primarily for fall chinook.

Page 35, paragraph 1

The Swinomish Tribe fishes primarily with gill nets in Skagit Bay and the lower river. In addition, the Upper Skagit Tribe fishes with gill nets as far as Faber's Landing, above Concrete.

Page 37, paragraph 3

If aggradation continues, either the dikes will have to be raised or the channel dredged. Further raising the dikes does not appear feasible and dredging would be very disruptive to the ecosystem. This problem should be addressed in the EIS.

Page 51, paragraph 2

The principal limiting factor to fisheries is the amount of available rearing area, which is directly related to cover. While sewage outfall, agricultural practices and siltation can affect fish production, they are not major factors within the project area.

Improper sand mining practices can leave potholes. However, if done according to permit provisions there will be no problems.

Fluctuating flows resulting from upriver hydro-electric dams are the primary cause of stranding. Stranded juvenile fish are also consumed by predators.

Relationship of the Proposed Project to
Land Use PlansPage 65, paragraph 3

The Corps of Engineers' project will be affected by surges from

both the Seattle City Light and Puget Sound Power and Light projects.

Probable Impacts of the Proposed Actions
on the Environment

Page 66, paragraph 3

As a result of sedimentation and channel aggradation, what will happen after the 100 year economic life of the project?

Page 75, paragraph 3

"Continued levee raising will eventually permit the channel bottom to become higher than the flood plain, in which case the integrity of the levee will become more difficult to maintain." This statement further emphasizes the need to assess what will happen after the life of the project.

Page 77, Water Quality

Construction procedures must be designed to minimize siltation. Procedures should be reviewed to ensure all precautionary measures are being taken.

Page 87, Habitats

Revegetation and maintenance programs must be more than "paper" programs. They must mitigate for losses of shore cover. Plantings must be made at a time when success is assured and proper care given. The mere planting is not acceptable in view of the losses associated with establishing natural cover. The revegetation plan, along with the Operation and Maintenance plan must be established and approved through all involved groups.

Page 93, paragraph 2

Project impact will affect rearing as well as migrating juvenile anadromous fish. Loss of cover will have an equal impact on resident fishes.

Page 94, paragraph 2

The loss of cover along one bank of the lower North Fork and on Tom Moore and Freshwater Sloughs still represents a loss and is not a compensation.

We feel the Corps has tried to minimize the impact of this project, while still accomplishing the objective of flood control. The losses of shore cover while not completely eliminated have been greatly reduced.

Sincerely,

William Bessie
Gordon Sandison
Director

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