



# City of Seattle

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## Seattle City Light

September 8, 2011

Hannah Hadley, Study Environmental Coordinator  
U.S. Army Corps of Engineers, Seattle District  
ATTN: CENWS-PM-PL-ER  
P.O. 3755  
Seattle, WA 98124-3755

RE: Comments on Skagit River General Investigation Study

Dear Ms. Hadley:

Seattle City Light (SCL) appreciates the opportunity to provide comments on the U.S. Army Corps of Engineers Notice of Intent (NOI) to prepare a Draft Environmental Impact Statement (DEIS) for the Skagit River General Investigation Study. Your NOI formally begins the scoping process under NEPA. As part of the scoping process, Seattle City Light wishes to comment on the scope of the DEIS. Our ongoing interest in the GI study stems from our ownership and operation of the Skagit Hydroelectric Project located in the upper watershed. As you know our project currently contributes greatly to flood reduction throughout the basin. Operation of our project also includes significant and ongoing investments in the protection and restoration of fish and wildlife resources throughout the watershed. In doing this we work closely with other state, federal and tribal organizations.

As we understand it, the primary intent of the flood risk management feasibility study is to formulate, evaluate, and screen potential solutions to flooding problems within the basin and to recommend an alternative. Our comments pertain to the scoping portion of this effort, understanding that public involvement and comment will be offered as well during plan formulation and preparation of the DEIS.

Our comments are of both a general and detailed nature as described below.

1. SCL supports the completion of the U.S. Army Corps of Engineer's Skagit River General Investigation Study provided that it is done in coordination with the development of Skagit County's Comprehensive Flood Hazard Management Plan (CFHMP) for the Skagit River. While Skagit County is proceeding toward the completion of it's CFHMP, the U.S. Army Corps of Engineers needs to remain actively involved in this multi-year process. Ongoing coordination will be essential as these two activities move forward in parallel.



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2. In May of 2009 the Skagit County's Skagit Comprehensive Flood Hazard Management Plan (CFHMP) Advisory Committee (AC) provided input on the Skagit GI measures. This input also included locally identified projects that will be considered for inclusion in the Comprehensive Flood Hazard Management Plan (CFHMP). The input was developed at a workshop the AC held on February 18, 2009 and at several regular AC meetings (March 16 and April 20, 2009). The AC provided its comments, suggestions, questions, and thoughts on whether an individual measure/project should be further considered and evaluated by the Army Corps GI Study. The purpose of this effort was to provide a local perspective on the Skagit GI measures for the Corps to consider as it begins its process of narrowing and combining individual measures into a shorter, more focused list of alternatives. We encourage the Army Corps to utilize the results of this effort in its narrowing process.
3. The mission of the Skagit River Comprehensive Flood Hazard Management Plan is to develop a comprehensive approach to Skagit River flood hazard reduction and management that decreases the flood hazard risk to people, property, infrastructure, fish and wildlife resources, and economic vitality, advances river restoration and other community interests, and reduces long-term costs associated with flood management and infrastructure maintenance. SCL wishes to underscore the need to ensure flood damage reduction efforts result in improvements to the natural assets of Skagit valley by incorporating ecosystem protection, restoration and natural resource considerations into flood hazard management solutions. Here are some specific flood reduction measure criteria.
  - Evaluate opportunities to reduce flood hazards via salmon recovery or other environmental restoration projects.
  - Look for opportunities to restore lost habitat and improve diversity of habitat for all wildlife species.
  - Address impacts to fish and wildlife habitat associated with flood reduction efforts.
  - Undertake cumulative effects analysis associated with multiple flood damage reduction efforts to ensure protection of ecosystem function.
  - Prioritize flood reduction measures that maximize ecosystem restoration opportunities when comparing similar projects.
  - Increase the natural flood water and sediment storage capacity of the floodplain through the protection and restoration of natural river, bank, tidal marsh, off channel, and wetland habitats.
  - Protect and restore natural riverine, riparian and estuarine processes.
  - Incorporate wetland restoration when possible.

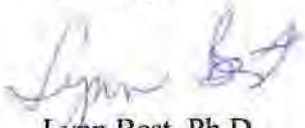




4. One of the flood reduction measures being considered is to create additional storage in Ross Reservoir. To accomplish this outcome power generation operations would have to be modified. This concept has been under discussion for more than 20 years. There are many serious concerns about this alternative including that the current operations and flows from the project are set by the FERC License and Settlement Agreement signed by all concerned federal and state agencies and tribes. As proposed, this measure would have high impacts to federally listed Chinook salmon and high financial cost to SCL for which we would need to be compensated.
5. SCL encourages the Army Corps to fully incorporate into the alternatives analyses the projected hydrologic changes and sea-level rise caused by climate change. The Climate Impacts Group (CIG) at the University of Washington has conducted extensive study on this subject and has documented increased variability in peak flows in the Sauk River watershed in recent decades. CIG modeling also projects substantial reductions in snow water equivalent (SWE) and more severe extreme hydrologic events (floods and low flows) in the Skagit River basin in the future due to shifts in precipitation and higher freezing elevations during winter storms that increase runoff production in moderate elevation areas.
6. The Skagit is the most important river in the Puget Sound for three fish species that are listed as Threatened under the Endangered Species Act: Chinook salmon, bull trout, and steelhead. The GI should carefully consider the effects of the proposed flood control alternatives on these species, since improving the abundance, spatial distribution, and life history and genetic diversity of Skagit populations are vital to the species recovery programs. The GI should identify alternatives that build-upon and compliment ongoing listed fish species recovery programs in the Skagit watershed.

Ideally, the recommended alternative would be composed of multiple measures that work synergistically with compounding benefits and the ongoing habitat protection and restoration programs in the Skagit watershed.

Sincerely,



Lynn Best, Ph.D.  
Director of Environmental Affairs

LB/DP:ks

