

From: [Johnson, Daniel E NWS](#)
To: [Hadley, Hannah F NWS](#); [Chang, Margaret NWS](#); [Brown, Keely N NWS](#)
Subject: RE: Skagit GI preliminary comments (UNCLASSIFIED)
Date: Tuesday, June 19, 2012 2:13:15 PM

Some good comments. These should be shared with the entire PDT.

Dan

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-----Original Message-----

From: Hadley, Hannah F NWS
Sent: Tuesday, June 19, 2012 7:28 AM
To: Chang, Margaret NWS; Brown, Keely N NWS; Johnson, Daniel E NWS
Subject: FW: Skagit GI preliminary comments (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

-----Original Message-----

From: Karen Myers [REDACTED]
Sent: Friday, June 15, 2012 3:26 PM
To: Hadley, Hannah F NWS; Harrington, John M NWS
Cc: Martha_L_Jensen@ [REDACTED]
Subject: Skagit GI preliminary comments

Hi Hannah and Matt-

At your request, and **as follow up to our meetings and conference calls** with you over the past couple of months, we are making the following preliminary comments for consideration at your upcoming internal discussion meeting on refinement of alternatives under the Skagit General Investigation (GI). We anticipate working with you more closely as this GI evolves to provide more formalized technical assistance under the FWCA, ESA, the CWA, and our other authorities. The following comments are offered under these authorities, and although they are relatively general in nature, they are intended to assist you in the next early stage of alternative review. We anticipate that we will be able to further refine our comments and coordination with you and other stakeholders and Tribes, especially under the FWCA, as you have a more refined list of likely alternatives.

The preliminary alternatives that the Corps presented at the April 25, 2012 meeting were roughly categorized into different types of actions (e.g., nonstructural/storage, bypasses, setbacks, etc.). We recognize that the next list of alternatives is likely to combine different kinds of action types within a given alternative in order to allow for site-specific considerations and flexibility.

- As the Corps drafts the new list of alternatives, we recommend that the Corps promote alternatives that would improve habitat for listed species, anadromous fish, and other species in the Lower Skagit River and its tributaries. **Many such alternatives are likely to have positive influences on the ability of the system to convey and/or more naturally attenuate flood flows compared to channelized conditions (e.g., setbacks).**

- We encourage the Corps to draft alternatives that include promoting setbacks wherever possible, appreciable restoration or enhancement of functional riparian corridors, restoration and/or construction of high quality and fish friendly side channels (that are designed avoid stranding or other impacts to aquatic organisms), and removal of hard shoreline armoring (to reduce edge habitat impacts, constriction of the stream, preclusion of riparian buffer establishments, and other effects).

- Where certain stream configurations or hard armoring is planned to be maintained or constructed, as in the case of Preliminary Alternative 3 (Urban Areas and Critical Infrastructure Protection), we encourage the Corps to include and consider a reach-based analysis for determining stability and indirect effects of a given feature, and adequately determine and avoid downstream and across-stream negative effects from the features.

- These and other similar measures, if meaningfully implemented, can result in improved foraging, migration, and overwintering of bull trout and rearing and foraging habitat for juvenile salmonids. This GI process gives the Corps an important opportunity to implement section 7(a)(1) of the Endangered Species Act, by "carrying out programs for the conservation of endangered species and threatened species...", and section 2(c) of the Act, "...to seek to conserve endangered species and threatened species" and use "authorities in furtherance of the purpose of this Act".

We look forward to continuing to work with you as you evaluate the alternatives for the Skagit GI, and appreciate the opportunity to provide these preliminary comments. Please email me if you have any questions. I will be out of the office and only very infrequently checking voicemails until July 2, 2012.

Thanks very much,
Karen Myers
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Caveats: NONE