

September 30, 2015

Mr. Rick Hartson  
Upper Skagit Indian Tribe  
25944 Community Plaza Way  
Sedro Woolley, WA 98284

RE: GOODELL CREEK ALLUVIAL FAN RESTORATION FEASIBILITY ANALYSIS

Dear Mr. Hartson:

Seattle City Light (City Light) would like to express our strong support for the Goodell Creek Alluvial Fan Restoration Feasibility Analysis as proposed by the Upper Skagit Indian Tribe (Tribe). The Goodell Creek alluvial fan is a large and complex environment that is important to native salmonids for spawning and rearing. City Light is committed to the stewardship of fishery resources in the Skagit Basin, and the return of a naturally functioning alluvial fan at Goodell Creek is a positive step in the restoration of listed Chinook Salmon, Steelhead, and Bull Trout. The lower section of Goodell Creek is currently constrained by levees and bank hardening (riprap), which reduces the natural stream function and habitat complexity within the historically extensive alluvial fan of this stream. Moreover, the Highway 20 bridge crossing the lower end of the stream, because it is a "bottleneck" to bedload transport, is resulting in the deposition of large amounts of bed materials a substantial distance upstream of the bridge.

City Light has been actively engaged with the Lead Entity for this project—the Skagit Watershed Council (SWC)—for 18 years. Currently City Light employees hold positions on the board of directors, the Technical Work Group (TWG), and the Habitat Protection Subcommittee to the TWG. As such, we were deeply involved with updating the Strategic Approach of the SWC by expanding the focus to include high value tributary streams important to federally listed Chinook Salmon, Steelhead, and Bull Trout. The 2015 update to the Strategic Approach identified Goodell Creek as a high priority for restoration, based upon the excellent habitat conditions upstream of the alluvial fan and high intrinsic productivity for Chinook Salmon of this watershed. Goodell Creek is also recognized as an important stream for Steelhead and Bull Trout spawning and rearing.

Modeling completed for the Concept Design Phase of the Goodell Creek Alluvial Fan Restoration Project predicts that the ongoing aggradation of the streambed will result in more fish habitat degradation, impaired water quality conditions, and the potential formation of migration blockages for adult and juvenile salmonids. Further, the

aggradation of bed materials above the bridge could result in channel avulsion that would threaten existing infrastructure including City Light's transmission towers and the National Park Service's (NPS) Goodell Creek Campground. The threats to salmon habitat and infrastructure caused by channel aggradation and avulsion, which are significant following a major landslide in the basin that occurred in 2003, may become much greater following the 2015 wildfire in the Goodell Creek basin. The feasibility study will inform project sponsors and partners on potential restoration alternatives and implementation of those alternatives in a manner consistent with the stated goals of the Lead Entity (SWC). A comprehensive feasibility assessment for restoration activities will provide economies of scale that individual proposals would not be able to achieve.

City Light does not agree with the "project of concern" (POC) designation for this project that was issued by the SRF Board Technical Review Panel (TRP). The POC designation was based on the concern that it will not be possible to implement this project without the commitment from City Light, the NPS, and Washington State Department of Transportation (WSDOT) to "fund and carryout the necessary (and expensive) mitigation of the constraints and their respective infrastructure". City Light owns the transmission line towers within the project area that are potentially impacted by this project. Several salmon habitat restoration projects involving similar risks to the City Light's transmission line infrastructure were both approved and subsequently funded by the SRF Board. . These projects include:

- ***Powerline Channel Restoration Project*** - an SRF Board-funded project that resulted in the construction of one of the largest floodplain channels for salmon spawning and rearing in the western United States. This major habitat restoration project extends for several thousand feet under City Light's transmission line corridor near the town of Marblemount. City Light, along with our state and tribal partners, developed innovative engineering solutions and provided the matching funding for construction.
- ***Illabot Creek Restoration Project*** - More recently, City Light has partnered with the Skagit River System Cooperative (SRSC) in successfully completing both the feasibility and first construction phases of the Illabot Creek Restoration Project. While this project indeed threatened several of City Light's transmission line towers, we worked in partnership with the project sponsor to develop innovative engineering solutions that would protect the powerline corridor while fully supporting and complimenting the salmon restoration elements of the project.

We feel that the POC designation for the Goodell Creek Project is unwarranted, since restoration projects with similar infrastructure concerns have been funded by the SRF Board and were successfully completed. The success in completing these complex

restoration projects, especially when infrastructure is involved, is a result of the close working partnerships that carry over to the Goodell Creek Project.

City Light has a long history of collaboration with the Tribe on ecosystem stewardship and has worked as a partner on fish habitat research and restoration projects throughout the Skagit River Basin. These include a multiple-year research project on the distribution of juvenile Chinook Salmon, Steelhead, and Bull Trout throughout the Skagit basin, the implementation of an outmigrant monitoring program for juvenile Steelhead in major tributaries of the Skagit, and the Middle Skagit habitat restoration and protection project assessment study.

City Light is committed to working with the Tribe, National Park Service, WSDOT, and other partners on the Goodell Creek alluvial fan restoration project. The proposed feasibility analysis is the next logical step in development of the project and would allow City Light to work both internally and with the project partners to identify roles and responsibilities and viable funding pathways for design and construction.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Best". The signature is fluid and cursive, with the first name "Lynn" being larger and more prominent than the last name "Best".

Lynn Best, Director  
Environmental Affairs & Real Estate Division  
Seattle City Light

cc: Scott Schuyler