

**SULTAN PLANNING BOARD  
AGENDA ITEM COVER SHEET**

---

ITEM NO: D-3  
DATE: January 8, 2009  
SUBJECT: PUD Preliminary (Re)licensing Proposal  
CONTACT PERSON: Deborah Knight, City Administrator *D. Knight*

**ISSUE:**

The issue before the City Council is to:

1. Receive information on the Snohomish County Public Utility District (PUD) Preliminary License Proposal issued on December 31, 2008 for public comment. The document is more than 470 pages long. The introduction is provided as Attachment A.
2. Provide direction to staff on potential mitigation concerns and responding to the Preliminary License Proposal during the 90-day comment period.

**STAFF RECOMMENDATION:**

Review the information provided; discuss issues and concerns; and provide direction to city staff on retaining a consultant to review the Preliminary License Proposal.

**SUMMARY:**

PUD has filed its preliminary license proposal (PLP) with FERC for the Jackson Hydroelectric Project on December 31, 2008. Comments on the PLP must be filed with FERC by March 31, 2009. The PLP is posted on the PUD's relicensing web site at:

<http://www.snopud.com/Content/External/Documents/relicensing/Relicense/PLP123108.pdf>

This will be the first opportunity for stakeholders including the City of Sultan to submit comments as part of the official record and lay the ground work for any future appeals through the relicensing process with FERC.

City staff recommend the Council retain a consultant to review the PLP and prepare comments for submittal to PUD and FERC. This work is not budgeted in

the 2009 budget. At Council direction, staff will seek a consultant and return to Council for approval. No work will begin until a contract is approved.

The PUD is beginning a series of meetings in January to develop a settlement negotiation with the stakeholders. A settlement negotiation will smooth the way for PUD to receive its relicensing permit with FERC. However, the inability to negotiate a settlement agreement with stakeholders will not bar PUD from receiving a permit. The City of Sultan and other stakeholders plan to attend the settlement negotiations to ensure the community's interests and concerns are taken into consideration.

The City, Fire District, School and other local stakeholders need to have our request for a dam safety warning system and other mitigation measures ready for these discussions.

There is a convergence of issues related to PUD's relicensing of the Jackson Hydroelectric Project and the FEMA flood restudy. Sultan is fortunate because the relicensing effort provides an opportunity to engage with PUD and potentially have PUD establish a set of operating procedures for the dam that meet FEMA requirements for flood storage. This could potentially reduce the revised base flood elevation. Staff will return to Council on January 22, 2008 with an update on the related FEMA flood restudy.

#### BACKGROUND:

Since 2003, the City and regional partners including Fire District 5, Sultan School District and Valley General Hospital have been working with the PUD through the relicensing process to mitigate for a potential failure of PUD's Culmback Dam in Sultan and the Sky Valley. The Sultan City Council expressed its concerns in Resolution 06-03. Until August 2008, the PUD has been unresponsive to the community's requests.

On August 18, the City met with PUD representatives at their request. During that meeting the City and Fire District 5 again requested PUD purchase, install, maintain and monitor an early warning system. The agreement would include a requirement for PUD to come back with the Sky Valley stakeholders every 8-10 years to review the existing system and upgrade the system as necessary to incorporate new technology. Potentially, the system would be reviewed at a minimum of 5 times during the life of the license. PUD representatives requested the City prepare a proposal for PUD's consideration.

PUD's recent interest in mitigating for a failure of the Culmback Dam appears to be tied to PUD's request to the City to use City property to mitigate the Dam's impact on the Sultan River and fish habitat. Prior to PUD's need to access City property, the PUD had rejected requests to replace the now inoperable early warning system installed when the hydroelectric project was built in 1984.

On September 4, 2008, community stakeholders requested assistance from the Snohomish County Department of Emergency Management (DEM) in developing a proposal to present to the Snohomish County Public Utility District (PUD) to mitigate the potential failure of the Culmback Dam. The mitigation proposal is tied to the process to renew PUD's federal license to operate the Jackson Hydroelectric Project.

On November 20, 2008, Snohomish County DEM provided the City with information on a dam safety warning systems through the Federal Signal Corps. Snohomish County DEM is looking to develop a regional warning system for natural and manmade disasters. The proposed systems could be linked together to provide a regional benefit. The City and Fire District have scheduled a meeting with the representative from the Federal Signal Corps in early January to evaluate the City's needs and prepare a proposal to PUD.

In addition, the Sultan stakeholders have identified other needs related to the relicensing project including:

- Requesting PUD study alternatives for maximizing flood control benefits and formalize flood control operations for the Jackson Hydroelectric Project (Project) through the FERC relicensing process. Attachment B
- Providing funding to develop emergency evacuation routes at key points around the Sultan community.
- Providing annual notification to the Sultan community regarding the dam and potential impacts to life and property.
- Constructing improvements to recreation facilities adjacent to the Sultan River.

#### FISCAL IMPACT:

It may be necessary for the City to contract with an attorney, hydrologic consultant or other specialist(s) to review the Preliminary License Proposal and respond and represent Sultan's interests. This is an unfunded budget item and will need to be discussed with the City Council. Depending on the scope of work, a contract could cost anywhere from \$2,000 to \$4,000.

#### RECOMMENDED ACTION:

Review the information provided; discuss issues and concerns; and provide direction to city staff on retaining a consultant to review the Preliminary License Proposal.

**ATTACHMENTS:**

**A – PUD Preliminary License Proposal - Chapters 1 and 2**

**B – Sultan Letter to PUD Requesting Amendment of Study Plan**

---



OFFICE OF THE GENERAL COUNSEL

2320 California Street • Everett, WA • 98201 • 425-783-8212  
Toll-free in Western Washington at 1-877-783-1000, ext. 8212  
FAX 425-783-8305 • www.snopud.com  
Mailing Address: P.O. Box 1107 • Everett, WA • 98206-1107

December 31, 2008

VIA ELECTRONIC FILING

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Re: Preliminary Licensing Proposal – Revised Filing  
*Jackson Hydroelectric Project, FERC Project No. 2157*

Dear Secretary Bose:

This afternoon Snohomish filed with the Commission the Preliminary Licensing Proposal for the Jackson Hydroelectric Project. When reviewing that filing, we realized that we failed to include the Appendices. Attached hereto is the original transmittal letter and the full Preliminary Licensing Proposal, with all Appendices.

The Preliminary Licensing Proposal is being filed in accordance with 18 C.F.R. § 5.16. Pursuant to the Commission’s regulations, participants and Commission staff may file comments on the Preliminary Licensing Proposal within 90 days of this filing. As required by 18 C.F.R. § 5.15, if any participant requests new information, studies, or other amendments to the approved study plan, they must include a demonstration of extraordinary circumstances.

We have re-served the individuals listed on the official service list in this proceeding with the full Preliminary Licensing Proposal, including this letter. I apologize for any inconvenience this may cause. If you have any questions about this error, please contact me at (425) 783-8250 or [jkallstrom@snopud.com](mailto:jkallstrom@snopud.com).

Respectfully submitted,

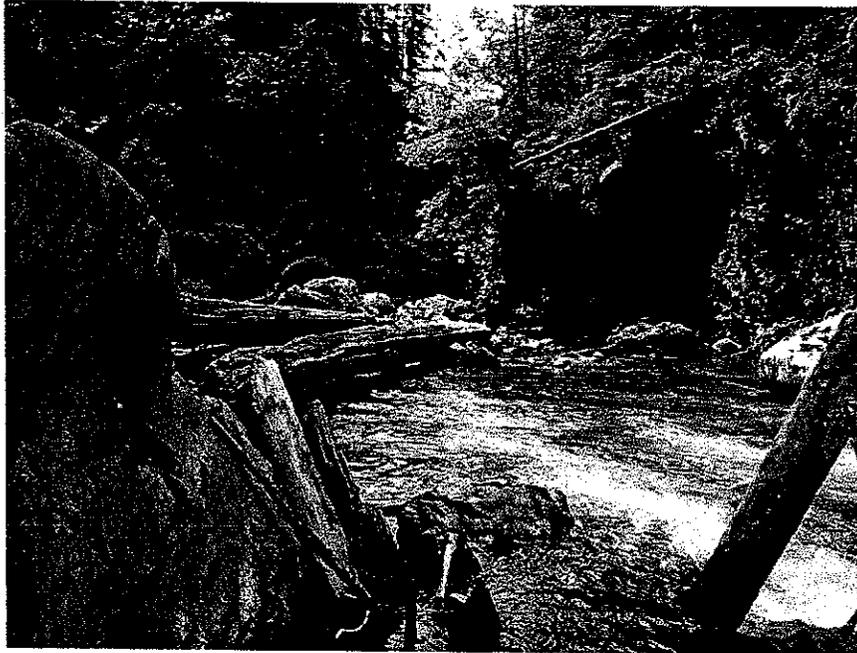
Jeffrey R. Kallstrom  
Senior Counsel

cc: Official Service List

# Preliminary License Proposal

**Henry M. Jackson Hydroelectric Project**

FERC No. 2157



**Prepared by:**

Public Utility District No. 1 of Snohomish County

**With assistance by:**

Meridian Environmental

Biota Pacific

R2 Resource Consultants

CH2M HILL

EDAW

Historical Research Associates

Van Ness Feldman

December 31, 2008

A-2

## Preliminary License Proposal – December 2008

### Table of Contents

1.0	Introduction.....	1
	1.1 Purpose and Structure of Preliminary License Proposal.....	1
	1.2 Relicensing Goals and Objectives .....	2
2.0	Relicensing Process .....	4
	2.1 Process Plan and Schedule.....	4
	2.2 Post-Filing Process and Schedule .....	11
	2.3 Licensee Agents and Contacts .....	12
3.0	Lands and Waters of Sultan River Basin .....	13
	3.1 Lands and Waters Overview .....	13
	3.2 Major Water Uses .....	14
	3.3 Dams in the Basin .....	14
	3.4 Tributary Streams.....	14
4.0	Jackson Project Overview.....	17
	4.1 Project Background.....	17
	4.2 Project Location .....	18
	4.3 Project Facilities.....	19
	4.3.1 Culmback Dam to Powerhouse.....	19
	4.3.2 Powerhouse to Diversion Dam and Downstream .....	22
	4.4 Existing Project Operations and Maintenance.....	23
	4.4.1 Project Capacity and Production.....	26
	4.4.2 Reservoir Operations .....	26
	4.4.3 Project Flow Data .....	28
	4.4.4 Downramping Regime .....	28
	4.4.4.1 Culmback Dam Downramping Regime.....	29
	4.4.4.2 Diversion Dam Downramping Regime .....	30
	4.4.4.3 Powerhouse Downramping Frequency .....	30
	4.5 Proposed Operations and Maintenance Plan.....	30
5.0	Environmental Analysis.....	31
	5.1 Geology and Soils.....	31
	5.1.1 Existing Conditions.....	31
	5.1.1.1 Geologic Setting.....	31
	5.1.1.2 Faults.....	32
	5.1.1.3 Seismicity.....	32
	5.1.1.4 Soils.....	32
	5.1.1.5 Reservoir Shorelines.....	32

A-3

5.1.1.6	Slope Stability .....	33
5.1.1.7	Mineral Resources .....	34
5.1.2	Project Effects .....	34
5.1.2.1	Reservoir Shorelines .....	34
5.1.2.2	Slope Stability .....	34
5.1.3	Proposed Protection, Mitigation and Enhancement Measures .....	35
5.2	Water Resources .....	35
5.2.1	Existing Conditions .....	35
5.2.1.1	Water Quantity .....	36
5.2.1.2	Water Quality .....	45
5.2.2	Project Effects .....	49
5.2.2.1	Water Quantity .....	49
5.2.2.2	Water Quality .....	54
5.2.3	Proposed Protection, Mitigation and Enhancement Measures .....	57
5.2.3.1	Water Quantity PM&E Analysis .....	57
5.2.3.2	Water Quantity PM&E Cumulative Analysis .....	71
5.2.3.3	Water Quality PM&E Analysis .....	75
5.3	Aquatic Resources .....	77
5.3.1	Existing Conditions .....	77
5.3.1.1	Sultan River Below Culmback Dam .....	77
5.3.1.2	Spada Lake .....	99
5.3.2	Project Effects .....	102
5.3.2.1	Effects on Sultan River Aquatic Habitat .....	102
5.3.2.2	Flow Fluctuation Effects on Aquatic Resources .....	112
5.3.2.3	Fish Migration .....	114
5.3.2.4	Effects on Aquatic Resources Upstream of Culmback Dam .....	116
5.3.2.5	Overall Effects on Lower Sultan River Salmon and Steelhead Production .....	118
5.3.2.6	Salmon and Steelhead Monitoring .....	121
5.3.3	Proposed Protection, Mitigation and Enhancement Measures .....	122
5.3.3.1	Sultan River Aquatic Habitat .....	123
5.3.3.2	Fish and Macroinvertebrates .....	144
5.4	Wildlife and Botanical Resources .....	146
5.4.1	Existing Conditions .....	146
5.4.1.1	Vegetation .....	146
5.4.1.2	Wildlife .....	152
5.4.2	Project Effects .....	156
5.4.2.1	Vegetation .....	156
5.4.2.2	Wildlife .....	161
5.4.3	Proposed Protection, Mitigation and Enhancement Measures .....	164
5.4.3.1	Vegetation .....	164
5.4.3.2	Wildlife .....	167

A-4

5.5	Wetlands, Riparian Areas and Littoral Habitat.....	173
5.5.1	Existing Conditions.....	173
5.5.1.1	Within the Project Area .....	173
5.5.1.2	Downstream of Culmback Dam.....	178
5.5.2	Effects of the Project.....	182
5.5.2.1	Effects on Project Lands .....	182
5.5.2.2	Effects Downstream of Project Area .....	184
5.5.3	Proposed Protection, Mitigation and Enhancement Measures ....	185
5.5.3.1	Wetland, Riparian and Littoral Zone Management.....	185
5.6	Rare, Threatened and Endangered Species.....	187
5.6.1	Existing Conditions.....	187
5.6.1.1	Rare, Threatened and Endangered Fish .....	187
5.6.1.2	Rare, Threatened and Endangered Plants .....	189
5.6.1.3	Rare, Threatened and Endangered Animals.....	190
5.6.2	Project Effects.....	201
5.6.2.1	Rare, Threatened and Endangered Fish .....	201
5.6.2.2	Rare, Threatened and Endangered Plants .....	201
5.6.2.3	Rare, Threatened and Endangered Wildlife.....	201
5.6.3	Proposed Protection, Mitigation and Enhancement Measures ....	204
5.6.3.1	Rare, Threatened and Endangered Fish .....	204
5.6.3.2	Rare, Threatened and Endangered Plants .....	204
5.6.3.3	Rare, Threatened and Endangered Wildlife.....	204
5.7	Recreation and Land Use .....	209
5.7.1	Existing Conditions.....	209
5.7.1.1	Recreation .....	209
5.7.1.2	Land Use.....	213
5.7.2	Project Effects.....	217
5.7.2.1	Recreation .....	217
5.7.2.2	Land Use .....	222
5.7.3	Proposed Protection, Mitigation and Enhancement Measures ....	223
5.7.3.1	Recreation .....	223
5.7.3.2	Land Use .....	236
5.8	Aesthetic/Visual Resources .....	241
5.8.1	Existing Conditions.....	241
5.8.1.1	Project Setting.....	241
5.8.1.2	Project Facilities.....	242
5.8.1.3	Project Operations.....	243
5.8.2	Project Effects.....	244
5.8.3	Proposed Protection, Mitigation and Enhancement Measures ....	245
5.9	Cultural Resources .....	245
5.9.1	Existing Conditions.....	245
5.9.1.1	Regulatory Framework .....	245

A-5

5.9.1.2	Area of Potential Effects.....	246
5.9.1.3	Cultural History .....	246
5.9.1.4	Cultural Resource Surveys.....	247
5.9.1.5	Recorded Cultural Resources and Historic Properties .....	248
5.9.2	Project Effects.....	249
5.9.2.1	Historic Properties .....	249
5.9.2.2	Traditional Cultural Properties and Tribal Access to Project Lands .....	249
5.9.3	Proposed Measures .....	250
5.10	Estimated Costs of PM&E Measures.....	251
6.0	References.....	253

**Appendices**

Appendix A	Project Operating Plan
Appendix B	Resource Group Meeting Summaries
Appendix C	Noxious Weed Plan
Appendix D	Terrestrial Resources Management Plan Outline
Appendix E	Department of Health Letter to City Regarding Recreation in the Watershed
Appendix F	Recreation Resources Management Plan Outline
Appendix G	Proposed PM&E Measures

A-6

## List of Figures

Figure 3-1	Principal tributaries of the Sultan River.....	15
Figure 4-1	Jackson Project location map.....	18
Figure 4-2	Sultan River basin with Spada Lake and Culmback Dam in the foreground.....	20
Figure 4-3	Jackson Project Powerhouse and switchyard viewed from upper back slope.....	22
Figure 4-4	The Sultan River Diversion Dam at RM 9.7.....	23
Figure 4-5	Jackson Project flow during normal operation. ....	24
Figure 4-6	Jackson Project high inflow or shutdown operation. ....	26
Figure 4-7	Jackson Project average monthly generation (MWh) (1990 through June 2008).....	27
Figure 4-8	Sultan River average monthly flows, pre-Project vs. post-Project. ....	27
Figure 5.2-1	Spada Lake daily minimum, maximum and average water levels observed (1990 to 2007) and operational rule curves.....	37
Figure 5.2-2	Operational Reaches 1, 2, and 3 on the Sultan River below Culmback Dam. ....	38
Figure 5.2-3	Daily flow exceedence for the Sultan River below Diversion Dam gage (USGS Gaging Station 12137800), 1983-2007.....	41
Figure 5.2-4	Daily flow exceedence for the Sultan River below Powerplant gage (USGS Gaging Station 12138160), 1983-2007. ....	42
Figure 5.2-5	Peak flows by water year with month of occurrence listed (Sultan River below Powerplant gage, USGS Gaging Station 12138160). ....	43
Figure 5.2-6	2007 water temperatures (7-DADMax) recorded at monitoring sites below Culmback Dam. ....	48
Figure 5.2-7	Comparison of Sultan River water temperatures (1969-1980 vs. 1984-2004) measured at the Diversion Dam. ....	55
Figure 5.2-8.	Linear water temperature profile of the Sultan River below Culmback Dam on July 7 and September 7, 2007, based on six monitoring locations. ....	56
Figure 5.2-9	Proposed Spada Lake operational rule curves. ....	65
Figure 5.2-10	Daily maximum, minimum and average reservoir elevations for the 109 year modeled scenario (City of Everett Average Annual Water Demand = 84 MGD). ....	67
Figure 5.2-11	Daily maximum, minimum and average reservoir elevations for the 109 year modeled scenario (City of Everett Average Annual Water Demand = 192 MGD). ....	68
Figure 5.2-12	Daily flows at the upstream end of OR-1 during a wet year (1991), an average year (2004), and a dry year (2001) under current and proposed operating conditions. ....	72
Figure 5.2-13	Daily flows at the upstream end of OR-2 during a wet year (1991), an average year (2004), and a dry year (2001) under current and proposed operating conditions. ....	73

Figure 5.2-14	Daily flows at the upstream end of OR-3 during a wet year (1991), an average year (2004), and a dry year (2001) under current and proposed operating conditions. ....	74
Figure 5.3-1	Composition of habitat types by operational reaches of the Sultan River.....	79
Figure 5.3-2	Life stage periodicities of salmonid species present within the Sultan River Basin. ....	82
Figure 5.3-3	Total Sultan River Chinook spawner escapement 1978-2008.....	84
Figure 5.3-4	Natural-origin Chinook spawner escapement 1998-2008.....	85
Figure 5.3-5	Sultan River pink salmon spawning escapement 1977-2007. ....	87
Figure 5.3-6	Sultan River vs. Snohomish basin (excluding Sultan River) pink salmon escapement correlation under Stage II conditions (1991-2005); no Snohomish basin data available for 2007.....	88
Figure 5.3-7	Sultan River chum salmon escapement trend under Stage II conditions (1991-2005); no Sultan River data available for 2003.....	90
Figure 5.3-8	Sultan River vs. Snohomish basin (excluding Sultan River) chum salmon correlation under Stage II conditions (1991-2005). ....	91
Figure 5.3-9	Sultan River steelhead spawning escapement 1993-2008 (no data for 2007).....	94
Figure 5.3-10	Sultan River vs. Snohomish basin (excluding Sultan River) steelhead correlation under Stage II conditions (1989-2006); no data for some years. ....	95
Figure 5.3-11	2005 lower Sultan River Benthic Invertebrate Index of Biological Integrity.....	99
Figure 5.3-12	Location of mapped side channel areas within OR-1 of the lower Sultan River. ....	132
Figure 5.4-1	Project area for terrestrial resources. ....	147
Figure 5.7-1	Proposed recreation facility development.....	225

## List of Tables

Table 2.1-1	List of studies finalized or currently underway and anticipated availability.....	5
Table 2.1-2	Resource Working Group participants.....	6
Table 2.1-3	Jackson Project relicensing process plan and schedule. ....	8
Table 2.2-1	Preliminary post-filing processing schedule as developed by FERC.....	11
Table 3-1	Physical characteristics of major tributaries in the Sultan River basin. ....	16
Table 4-1	Morphometric and operational data for Spada Lake.....	20
Table 4.2	Mean and median accretion flows (in cfs) in the Sultan River between Culmback Dam and the Powerhouse. ....	29
Table 5.2-1	Sultan River instream flow requirements. ....	39
Table 5.2-2	Jackson Hydroelectric Project Powerhouse downramping rate schedule <sup>a</sup> (inches/hour). ....	44
Table 5.2-3	Diversion Dam downramping rate schedule <sup>a</sup> .....	44
Table 5.2-4	Summary of select Washington water quality standards for Core Summer Salmonid Habitat. ....	46
Table 5.2-5	State water quality standards for Extraordinary and Primary Contact Recreation - fecal coliform parameter.....	46
Table 5.2-6	Proposed and current (in parentheses) minimum flow releases for OR-1 and OR-2 of the Sultan River.....	59
Table 5.2-7	Maximum duration (hours) of potential whitewater boating flow releases without exceeding 900 acre-feet of storage.....	64
Table 5.2-8	Proposed Powerhouse downramping frequency limitations.....	70
Table 5.3-1	Annual steelhead smolt releases in the Sultan River. ....	93
Table 5.3-2	Habitat areas provided in OR-3 under Stage I and Stage II conditions.....	107
Table 5.3-3	Habitat area provided in OR-2 under Stage I and Stage II conditions.....	108
Table 5.3-4	Habitat area provided in OR-1 under Stage I and Stage II conditions.....	109
Table 5.3-5	Pelton shutdowns since 1998 for unit or facility protection. ....	113
Table 5.3-6	Estimates of adult Chinook, coho, and steelhead production potential in the Sultan River upstream of the Diversion Dam. ....	115
Table 5.3-7	Habitat area provided in OR-2 under Stage II and Proposed conditions.....	124
Table 5.3-8	Habitat area provided in OR-1 under Stage II and Proposed PM&E conditions.....	125
Table 5.3-9	Annual sport harvest estimates for summer and winter steelhead in the Sultan River from 1995 through 2003. ....	145
Table 5.4-1	Cover types and acres within the existing WHMP tracts <sup>1</sup> .....	148
Table 5.4-2	Weed species, weed status, and number of infestations by geographic area. ....	150
Table 5.4-3	Mammals (or their sign) most often observed in the Project area. ....	152

A-9

Table 5.4-4	Example of birds recently observed in the Project area.....	153
Table 5.4-5	Existing WHMP management tract summary. ....	154
Table 5.4-6	Acres managed to protect existing old-growth forest and acres of second-growth forest managed to promote the development of old-growth characteristics. ....	157
Table 5.4-7	Impact and mitigation summary of habitat units under the existing WHMP. ....	163
Table 5.4-8	Impact and mitigation summary of habitat units, with and without Lake Chaplain Tract.....	172
Table 5.5-1	Wetland functional rating summary for Spada Lake, Williamson Creek, Lost Lake, and Lake Chaplain tracts.....	174
Table 5.5-2	Sizes and classifications of wetlands on the Sultan River downstream of Culmback Dam. ....	179
Table 5.6-1	Special status fish species documented in the Jackson Project area. ....	187
Table 5.6-2	Special status wildlife species documented in Snohomish County or known or suspected to occur on Mt. Baker-Snoqualmie National Forest that may occur within the Jackson Project area.....	196
Table 5.7-1	Recreation sites operated and maintained by the District. ....	210
Table 5.7-2	Recreation Flow Study reaches and typical recreation uses. ....	220
Table 5.7-3	Whitewater boating flows identified in Sultan River segments 2, 3 and 4.....	222
Table 5.9-1	Cultural Resource Studies in the APE and general vicinity. ....	247
Table 5.9-2	Schedule for Implementing Cultural Resources Management Measures .....	250

A-10

## **1.0 INTRODUCTION**

### **1.1 Purpose and Structure of Preliminary License Proposal**

This document presents the Preliminary License Proposal of Public Utility District No. 1 of Snohomish County (District) for the continued operation of the 111.8 megawatt (MW) Henry M. Jackson Hydroelectric Project (Project), FERC No. 2157, under the terms of a new license. The purpose of a Preliminary License Proposal (PLP) is to present an applicant's or licensee's preliminary proposal for protection, mitigation and enhancement (PM&E) measures that are intended to address the effects of the continued operation of a project on the existing area resources (18 CFR § 5.16). The District firmly believes that the measures presented in this PLP fairly address the multiple requirements of the Project; to protect the safe yield of the City of Everett's (City) municipal water supply, to provide instream flows below the Project that protect and sustain aquatic species and habitat, to provide flood control within the capability of the Project, and to provide power to the citizens and businesses of Snohomish County.

The PM&E measures presented in this document reflect the District's proposals for the term of a new license. Since 2005 the District has been conducting studies and consulting with stakeholders on measures that best address the continued effects of Project operation on natural and social resources in the Project area. While there appears to be consensus on a number of the measures described and evaluated in Section 5.0 of this document, others may be considered as works-in-progress. Consultation with the stakeholders will continue as the parties attempt to reach settlement on all issues and measures prior to filing a Final License Application with the Federal Energy Regulatory Commission (FERC) on May 31, 2009.

This PLP meets the requirement of 18 CFR § 5.16 relating to FERC's Integrated Licensing Process (ILP) and is organized in sections as described below.

- **Section 1.0** – Introduction
- **Section 2.0** – Relicensing Plan
- **Section 3.0** – Lands and Waters of Sultan River Basin
- **Section 4.0** – Jackson Project Overview
- **Section 5.0** – Environmental Analysis
  - 5.1 Geology and Soils
  - 5.2 Water Resources
  - 5.3 Aquatic Resources
  - 5.4 Wildlife and Botanical Resources

A-11

- 5.5 Wetland, Riparian Areas and Littoral Habitat
- 5.6 Rare, Threatened and Endangered Species
- 5.7 Recreation and Land Use
- 5.8 Aesthetic/Visual Resources
- 5.9 Cultural Resources
- 5.10 Estimated Costs of PM&E Measures

- **Section 6.0 – References**

- **Appendices**

- Appendix A – Project Operating Plan
- Appendix B – Resource Group Meeting Summaries
- Appendix C – Noxious Weed Plan
- Appendix D - Terrestrial Resource Management Plan Outline
- Appendix E - Letter from Washington Department of Health to City of Everett
- Appendix F – Recreation Resource Management Plan Outline

Within each subsection of Section 5.0 – Environmental Analysis, the existing environment is described, effects of continuing Project operations on each resource area identified, the District’s proposed PM&E measures set forth, and the benefit of each measure analyzed. This PLP document lays the foundation for continuing consultation with stakeholders on those issues and measures not yet resolved, and for the environmental exhibit (Exhibit E) of the Final License Application.

## **1.2 Relicensing Goals and Objectives**

Public Utility District No.1 of Snohomish County and the City of Everett (as current co-licensees) defined their mutual goal for a new license term in early 2005, prior to initiating the formal relicensing process for the Jackson Hydroelectric Project. On November 1, 2007, the District and the City requested that the City be removed as a co-licensee during the next license term. FERC’s December 20, 2007, Declaratory Order found no reason that the City must remain a licensee under a new license. Following this FERC Order, the District reviewed the 2005 goals and objectives to determine whether they were still relevant and valid to the District as the sole licensee. Other than changing several references from “co-licensees” to “the District”, all goals and objectives remain valid and have served to guide consultation with stakeholders and the development of proposed measures and plans. The primary goal and the objectives are repeated below as a reminder of the multiple factors and resources to be balanced during the process of relicensing the Jackson Hydroelectric Project.

The goal of this relicensing process is to obtain a new 50-year federal license for the Henry M. Jackson Hydroelectric Project that will allow the Project to continue to

A-12

operate in an economically feasible manner and protect the high quality public water supply in balance with fish, wildlife, recreation, and cultural resources.

To accomplish this goal, the co-licensees identified the following objectives:

- Prepare an application that is technically sound and provides a reasonable balance of water supply, power and environmental values such as fish, wildlife and recreation.
- Continue to provide recreational opportunities consistent with the current Jackson Project Recreation Plan.
- Continue to manage the Project in a manner that protects the fishery resources in the Sultan River.
- Continue to protect terrestrial resources consistent with current FERC approved plans through 2060.
- Interact with agencies, tribes and the public in a manner such that each party's concerns are considered.
- Adhere to FERC regulations and timelines.
- Develop and use reliable and scientifically credible information that can provide the basis for technically sound, balanced and effective relicensing decisions.
- Enhance public awareness among Snohomish County ratepayer/owners regarding relicensing issues.
- Obtain and implement a new license at a cost that ensures the Project's ability to provide an affordable public water and power supply.
- Obtain a 50-year license that allows sufficient operational flexibility and capacity to help provide long-term economic benefit and stability for the communities served by the co-licensees.
- Protect the water rights, quantity and quality of the water supply system to ensure that current and future public needs can be met.

## 2.0 RELICENSING PROCESS

### 2.1 Process Plan and Schedule

Public Utility District No. 1 of Snohomish County (District) and the City of Everett (City) formally initiated the relicensing process for the Jackson Project on December 1, 2005 by filing a Notice of Intent to seek a new operating license and a Pre-Application Document (PAD) describing the existing Project and environment. Over the ensuing two years the District conducted 21 studies to investigate the potential effects of continuing operation of the Project on the natural and social resources (see Table 2.1-1); held numerous stakeholder and resource group meetings (see Table 2.1-2 for listing of resource group participants); and developed protection, mitigation and enhancement (PM&E) measures (see Section 5.0) to address the potential effects of ongoing Project operation.

The District and the City entered into an agreement in 2007 in which the District would be the sole applicant for a new license under the Federal Power Act. Both the District and City petitioned the FERC to release the City as a co-applicant for the new license, and FERC approved this request in December 2007.

This document, the Preliminary License Proposal (PLP), presents the District's proposed PM&E measures for the term of a new license for the Project. The District believes that these measures adequately address the effects of the Project on the surrounding environment and are pleased that there appears to be concurrence on a number of the issues and proposed PM&Es. Although there are still several unresolved issues to work through with the stakeholders, the District is committed to continuing meetings and communications as often as necessary to attempt to resolve these outstanding issues. The goal of all parties to this proceeding is to reach a comprehensive settlement agreement that defines the operation and implementation actions and responsibilities of all parties over the next 50 years.

In the absence of a settlement agreement, the District will put forward its' alternative for the continued operation of the Project under the terms of a new license. This alternative will reflect the agreements reached with stakeholders on specific issues, and the District's proposal for those measures lacking full stakeholder consensus.

The schedule presented as Table 2.1-3 identifies each of the key steps in the Jackson Project Integrated License Process (ILP), from submittal of the Notice of Intent and the PAD in 2005 through filing of the Final License Application in 2009. The shaded rows describe steps in the ILP that have already been completed.

A-14

**Table 2.1-1 List of studies finalized or currently underway and anticipated availability.**

Study Plan #	Study Plan Title	Draft Final Technical Report Available for Stakeholder Review	Final Technical Report Complete*
RSP 1	Water Quality Parameter Study	June 2009	July 2009
RSP 2	Bypass Reach Cutthroat Trout Population Analysis		June 2008
RSP 3	Sultan River Instream Flow Study	September 2008	October 2008
RSP 4	Assessment of Spada Lake Fish Entrainment		December 2007
RSP 5	Juvenile Fish Abundance, Life History and Distribution	January 2009	February 2009
RSP 6	Habitat Management Methods Literature Review and Evaluation		November 2007
RSP 7	Special Status Plant Surveys		February 2008
RSP 8	Noxious Weed Inventory		February 2008
RSP 9	Wetlands Survey	September 2008	October 2008
RSP 10	Amphibian Survey	September 2008	October 2008
RSP 11	Marbled Murrelet Surveys	August 2008	October 2008
RSP 12	Northern Spotted Owl Surveys	August 2008	October 2008
RSP 13	Recreation Needs Analysis	September 2008	October 2008
RSP 14	Flow Recreation Study		July 2008
RSP 15	Historic Properties Study		March 2008
RSP 16	Spada Lake Trout Production		August 2008
RSP 18	Riverine, Riparian and Wetland Habitat Assessment of the Sultan River below Culmback Dam		March 2008
RSP 20	Fish Passage Assessment	Phase 2: September 2008	Phase 1: January 2008 Phase 2: October 2008
RSP 21	Flow Continuation Alternatives and Feasibility at the Powerhouse	September 2008	October 2008
RSP 22	Sultan River Physical Process Studies		June 2008, October 2008
RSP 23	Indicators of Hydrologic Alteration/Range of Variability Analysis (IHA/RVA) in the Sultan River Downstream of Culmback Dam		January 2008
RSP 24	Marsh Creek Slide Modification Assessment to Improve Fish Passage	April 2009	May 2009

\* A bolded study indicates that its technical report has been finalized after stakeholder review and comment.

A-15

**Table 2.1-2 Resource Working Group participants.**

<b>ORGANIZATION</b>	<b>CONTACT NAME</b>
<b><i>Cultural Resources Group</i></b>	
City of Everett	Jan Meston, Dave Koenig, Julie Sklare
FERC	Frank Winchell
District	Dawn Presler, Kim Moore
Snohomish County	Brent Lambert
Snoqualmie Tribe	Ian Kanair, Karen Suyama, Andrea Rodgers, Ray Mullen, Steve Mullen
Stillaguamish Tribe	Victoria Yeager
Tulalip Tribes	Hank Gobin, Daryl Williams, Reid Allison
U.S. Forest Service	Jan Hollenbeck
Washington Department of Archaeology and Historic Preservation	Rob Whitlam
Washington Department of Natural Resources	Lee Stilson
<b><i>Aquatics Resources Working Group</i></b>	
American Whitewater	Tom O'Keefe
City of Everett	Julie Sklare, Jim Miller
City of Sultan	Deborah Knight
FERC	Matt Cutlip
National Marine Fishery Services	Steve Fransen
District	Keith Binkley, Bruce Meaker, Dawn Presler, Kim Moore
Snohomish County Surface Water Mgmt	David Brookings, Chris Nelson, John Engal, Andy Haas
Snoqualmie Tribe	Ian Kanair, Karen Suyama, Cindy Spiry
Trout Unlimited	Gary Bee, Kate Miller
Tulalip Tribes	Daryl Williams, Abby Hook, Anne Savery Cleve Steward, Dustin Hinson (AMEC)
U.S. Army Corps of Engineers	Carolyn Fitzgerald, Larry Schick
U.S. Fish and Wildlife Service	Tim Romanski
U.S. Forest Service	Karen Chang, Barry Gall, Margaret Beilharz, Dean Grover
Washington Department of Ecology	Monika Kannadaguli, Jim Pacheco, Chris Maynard, Brad Caldwell, Gerry Shervey, Susan Braley (WQ only)
Washington Department of Fish and Wildlife	Rich Johnson, Al Wald, Hal Beecher
Washington Department of Natural Resources	Laurie Bergvall, Alison Hitchcock, Jay Guthrie
<b><i>Recreation Resources Group</i></b>	
American Whitewater	Tom O'Keefe, Andy Bridge
Backcountry Bicycles Trails Club	Justin Vander Pol

A-16

<b>ORGANIZATION</b>	<b>CONTACT NAME</b>
Boeing Employees Everett Prospectors Society	Mike Dunican
Cascade Land Conservancy	Joe Sambataro
City of Everett	Julie Sklare
City of Sultan	Connie Dunn, Deborah Knight
District	Karen Bedrossian, Dawn Presler, Bruce Meaker, Kim Moore, Mike Schutt, Barry Chrisman, Zeda Williams
Everett Mountaineers	
FERC	Patti Leppert
International Mountain Bike Association (Western WA)	Art Tuftee
Mining claimants	William Raether, David Dorough
National Park Service	Susan Rosebrough, Michael Linde
Public	Catherine Cook, David Head, Glenn Rudolph
Recreation and Conservation Office (formerly IAC)	Jim Eychaner
Snohomish County Fire District No. 5	Merlin Halverson
Snohomish County Parks and Recreation	Marc Krandel, Tom Eksten
Snohomish County Surface Water Mgmt	David Brookings
Snohomish Sportsmen Club	Bob Heirman, Ralph Dahlquist
Snoqualmie Tribe	Ian Kanair, Karen Suyama, Cindy Spiry, Steve Mullen
Tulalip Tribes	Daryl Williams Cleve Steward, Dustin Hinson (AMEC)
U.S. Fish and Wildlife Service	Tim Romanski
U.S. Forest Service	Don Gay, Tom Davis, Eric Ozog
Washington Climbers Coalition	Mark Hanna, Matt Perkins
Washington Department of Ecology	Monika Kannadaguli, Gerry Shervey
Washington Department of Fish and Wildlife	Rich Johnson
Washington Department of Health	Jolyn Leslie
Washington Department of Natural Resources	Laurie Bergvall, Jim Cahill, Peter McBride, Candace Johnson, Stan Kurowski, Alison Hitchcock, Jay Guthrie
Washington Prospectors Mining Association	Chuck Cox, Jim Miller
Washington Trails Association	Jane Shattuck
	James Cooke
	Kent O'Sell
<b>Terrestrial Resources Group</b>	
American Whitewater	Tom O'Keefe
Cascade Conservation	Rick McGuire
City of Everett	Julie Sklare
City of Sultan	Deborah Knight
FERC	David Turner

A-17

ORGANIZATION	CONTACT NAME
District	Karen Bedrossian, Bruce Meaker, Dawn Presler, Kim Moore, Mike Schutt, Barry Chrisman, Zeda Williams
North Cascades Conservation Council	Rick McGuire
Snohomish County	Sonny Gohrman
Snoqualmie Tribe	Ian Kanair, Cindy Spiry, Karen Suyama, Steve Mullen
Tulalip Tribes	Daryl Williams Cleve Steward, Dustin Hinson (AMEC)
U.S. Fish and Wildlife Service	Tim Romanski
U.S. Forest Service	Don Gay, Ann Risvold
Washington Department of Ecology	Monika Kannadaguli, Gerry Shervey
Washington Department of Fish and Wildlife	Rich Johnson
Washington Department of Natural Resources	Laurie Bergvall, Peter McBride, Alison Hitchcock, Jay Guthrie

**Table 2.1-3 Jackson Project relicensing process plan and schedule<sup>1</sup>.**

Responsible Entity	Pre-Filing Milestone	Date	FERC Regulation	Process Days
District & City	Issue Public Notice for NOI/PAD	12/1/05	5.3(d)(2)	
District & City	File NOI/PAD with FERC	12/1/05	5.5, 5.6	
FERC	Tribal Meetings	1/3/06	5.7	30 days from NOI
FERC	Issue Notice of Commencement of Proceeding; Issue Scoping Document 1	1/30/06	5.8	60 days from NOI
FERC	Jackson Project Site Visit and Scoping Meetings	10/17/05 (Site Visit); 2/27/06 & 2/28/06 (Scoping Meetings)	5.8(b)(viii)	Scoping Meeting 30 days from Scoping notice. Site visit held early to accommodate weather conditions.
All stakeholders	PAD/SD1 Comments and Study Requests Due	3/31/06	5.9	60 days from Commencement
FERC	Issue Scoping Document 2	5/15/06	5.1	45 days from SD1 comment due date
District & City	File Proposed Study Plan (PSP)	5/15/06	5.11(a)	45 days from SD1 comment due date

<sup>1</sup> Dates have been adjusted from the process time periods presented in 18 CFR Part 5, where necessary, to avoid deadlines falling on weekends or holidays.

A-18

Responsible Entity	Pre-Filing Milestone	Date	FERC Regulation	Process Days
All stakeholders	Proposed Study Plan Meeting	6/14/06	5.11(e)	within 30 days of filing PSP
All stakeholders	Proposed Study Plan Comments Due	8/14/06	5.12	90 days of filing PSP
District & City	File Revised Study Plan	9/13/06	5.13(a)	30 days of close of comment
All stakeholders	Revised Study Plan Comments Due	9/28/06	5.13(b)	15 days from revised PSP
FERC	Director's Study Plan Determination	10/13/06	5.13(c)	30 days from filing revised PSP
USFS, USFWS, Ecology	Any Study Disputes Due <sup>2</sup>	11/2/06	5.14(a)	20 days from determination
Dispute Panel	Third Panel Member Selected	11/17/06	5.14(d)(3)	15 days from notice of SD
Dispute Panel	Dispute Resolution Panel Convenes	11/22/06	5.14(d)	20 days from notice of SD
District & City	Applicant Comments on Study Disputes Due	11/27/06	5.14(j)	25 days from notice of SD
Dispute Panel	Dispute Resolution Panel Technical Conference	12/4/06	5.14(j)	assumes approximately 30 days from notice of SD
Dispute Panel	Dispute Resolution Panel Findings Issued	12/22/06	5.14(k)	50 days from notice of SD
FERC	Director's Study Dispute Determination	1/11/07	5.14(l)	70 days from SD notice
District & City	First Study Season	4/07 through 10/07	5.15(a)	one year time frame after study determination
District & City	Initial Study Report	10/12/07	5.15(c)(1)	365 days from study determination
All stakeholders	Initial Study Report Meeting	10/29/07	5.15(c)(2)	15 days from initial report
District & City	Initial Study Report Meeting Summary	11/13/07	5.15(c)(3)	15 days from study meeting
All stakeholders	Any Disputes/Requests to Amend Study Plan Due	12/13/07	5.15(c)(4)	30 days from study summary

<sup>2</sup> Shaded milestones are unnecessary activities if no disputes.

A-19

Responsible Entity	Pre-Filing Milestone	Date	FERC Regulation	Process Days
All stakeholders	Responses to Disputes/Amendment Requests Due	1/14/08	5.15(c)(5)	30 days from comment due date
FERC	Director's Determination on Disputes/Amendments	2/13/08	5.15(c)(6)	30 days from response due date
All stakeholders	Interim Comment Period - Any Disputes/Requests to Amend Study Plan Due	3/15/08	Project-specific, non-regulatory	pertains to study reports completed between ISR and 2/28/08
All stakeholders	Responses to Disputes/Study Amendment Requests Due	4/15/08	Project-specific, non-regulatory	pertains to study reports completed between ISR and 2/28/08
FERC	Director's Determination on Disputes/Amendments	5/14/08	Project-specific, non-regulatory	pertains to study reports completed between ISR and 2/28/08
District & City	Second Study Season	4/08 through 10/08	5.15(a)	one year time frame after study determination
District	Updated Study Report due	10/13/08	5.15(f)	2 years from initial study plan determination
All stakeholders	Updated Study Report Meeting	10/28/08	5.15(f)	15 days from initial report
District	Updated Study Report Meeting Summary	11/12/08	5.15(f)	15 days from study meeting
All stakeholders	Any Disputes/Requests to Amend Study Plan Due	12/12/08	5.15(f)	30 days from study summary
All stakeholders	Responses to Disputes/Amendment Requests Due	1/12/09	5.15(f)	30 days from comment due date
FERC	Director's Determination on Disputes/Amendments	2/11/09	5.15(f)	30 days from response due date
District	File Preliminary Licensing Proposal	12/31/08	5.16(a)	150 days from filing application
All stakeholders	Preliminary Licensing Proposal Comments Due	3/31/09	5.16(e)	90 days from PLP filing
District	File Final License Application	5/31/09	5.17	2 years before expiration
District	Issue Public Notice of License Application Filing	6/14/09	5.17(d)(2)	14 days from filing

A-20

Following the distribution of the District's PLP on December 31, 2008, all stakeholders and interested parties will have 90 days, until March 31, 2009, to file with FERC comments on the proposed PM&Es described and analyzed in the document. All comments will be evaluated and reflected in the Final License Application, either by incorporation of a recommendation into the body of the document, or by an explanation of the reason the recommendation was not adopted. The District envisions continuing to work with stakeholders to resolve issues and identify mutually acceptable PM&E measures during the 90-day PLP review and comment period, and beyond as needed.

To facilitate the settlement process, formal negotiations with stakeholder representatives and attorneys may be established. This may require the execution of communication and confidentiality agreements by the parties to the settlement negotiations. Such agreements are meant to give the parties the freedom to discuss options and find solutions that may not be possible in a more public forum, and to ensure that discussions or agreements are not disseminated or misrepresented to the public before they are ready.

## 2.2 Post-Filing Process and Schedule

Following filing of the Final License Application by May 31, 2009, FERC will undertake its review of the information in accordance with the Federal Power Act, National Environmental Policy Act (NEPA), and other federal laws relevant to the relicensing of a hydroelectric project. FERC's preliminary plan and schedule for the post-filing activities are shown in Table 2.2-1.

**Table 2.2-1 Preliminary post-filing processing schedule as developed by FERC.**

Responsible Entity	Post-Filing Milestone	Date	FERC Regulation	Process Days
FERC	Issue Public Notice of License Application Filing (Tendering Notice)	6/13/09	5.19	14 days from filing
FERC	Director's Determination on Any Additional Study Requests and Notification of Any Deficiencies	6/30/09	5.19(e); 5.20(a)(2)	30 days from filing
FERC	Issue Public Notice Accepting Application and Ready for Environmental Analysis (REA)	8/12/09	5.22	60 days from Tendering Notice
All stakeholders	Comments, Interventions, 10(a) Recommendations Due	10/12/09	5.23(a)	60 days from REA
Agencies	10(j) Recommendations; 4(e) Terms and Conditions; Fishway Prescriptions Due	10/12/09	5.23(a)	60 days from REA
PUD & City	Request 401 Water Quality Certification from Ecology	10/12/09	5.23(b)	60 days from REA
PUD & City	Reply Comments Due	11/25/09	5.23(a)	105 days from REA

A-21

Responsible Entity	Post-Filing Milestone	Date	FERC Regulation	Process Days
FERC	Issue Single Environmental Assessment (EA) <sup>3</sup>	3/25/10	5.24	120 days from REA response due date
All stakeholders	Single EA Comments Due	4/26/10	5.24(c)	30 days after EA
Agencies	USFS Modified 4(e) Terms and Conditions Due; USFWS Modified Fishway Prescriptions Due	6/25/10	5.24(d)	60 days from EA comment due date
FWS/NMFS	ESA Biological Opinion As Needed	8/9/10	ESA	135 days from EA
Ecology	Issue water quality certification	10/12/10	5.23(b)(2)	365 days from request for certification
FERC	Issue License Order	11/29/10	FPA	assumes 18 months from filing

Source: FERC staff

## 2.3 Licensee Agents and Contacts

Public Utility District No. 1 of Snohomish County is a municipal corporation of the State of Washington whose authority is vested in its elected governing body.

Pursuant to Resolution No. 5179, dated October 19, 2004, the District's Board of Commissioners delegated to the District's General Manager the authority to conduct "routine relicensing activities", as defined therein, on behalf of the District, reserving unto itself the sole authority to approve formal relicensing documents and applications to be filed with FERC, and all agreements with stakeholders, among other things.

The District's General Manager is:

Steve Klein  
 Public Utility District No. 1 of Snohomish County  
 2320 California Street  
 PO Box 1107  
 Everett, WA 98206-1107  
 Telephone: 425-783-8473

A-22

<sup>3</sup> This schedule assumes FERC will issue a "single" EA (without a draft EA). If FERC determines that a draft EA is needed, the post-filing timeframes will be modified accordingly.



# City of Sultan

December 16, 2008

Bruce Meaker  
Senior Manager of Regulatory Affairs, Water Resources  
Snohomish County PUD  
PO Box 1107  
Everett, WA 98206-1107

Re: Amendment of Study Plan for FERC Relicensing of the Jackson Hydroelectric Project – Alternatives for providing dedicated flood control

Dear Bruce,

The City of Sultan wants to thank you and the Snohomish County Public Utility District No. 1 (PUD) for the efforts to mitigate the impact of the Jackson Hydroelectric Project on the City of Sultan and surrounding communities. As a part of the PUD's relicensing process, the City requests the PUD study alternatives for maximizing flood control benefits and formalize flood control operations for the Jackson Hydroelectric Project (Project) through the FERC relicensing process.

### Alternatives to Maximize Flood Control

Under its current design, the Project cannot mitigate the impacts of very large or multi-storm flood events on the Sultan River, Skykomish River, and Snohomish River because of the Culmback Dam's limited outflow capacity. Maximizing flood control will protect downstream land owners, restore and maintain critical riparian habitat, and enable storage to be accounted for in FEMA flood studies.

At a minimum, the City is requesting PUD analyze the following flood control and process level flow alternatives:

1. No change to current operations. Route all flows through the powerhouse.
2. Return the reservoir to elevation 1430' as rapidly as possible during the winter flood season by discharging through the powerhouse and release valve at the base of the dam.
3. Install an additional valve to enable larger process-level flows and more expedient return of the reservoir to 1430'.

The study should consider different normal pool levels throughout the year and the probability of occurrence of a very broad range of storms to determine the

statistical significance of the "second storm". The study should also consider what flows have the potential to cause flood damage in Sultan. This will aid PUD and Project stakeholders to make informed decisions regarding selection of the preferred alternative.

The approach used for the analysis will need to be documented and approved in writing by FEMA prior to undertaking the analysis to ensure it is compatible with FEMA Guidelines and Specifications on Flood Hazard Mapping.

#### Formalize Flood Control Operations

The Jackson Hydroelectric Project provides considerable reduction in flood levels for isolated storms in the Sultan basin. Recent studies show how the Project reduced flooding during significant storm events in 1990, 1995, 2006 and most recently in November 2008.

Under the current license, flood storage is secondary to other project operations. Formalization of the flood control operations will allow the reduction of flood levels to be considered by FEMA in its flood studies of the Sultan, Skykomish and Snohomish Rivers. The PUD's adopted flood storage operations need to be formalized to ensure future protection of downstream residents and businesses.

The flood control operations will need to be reviewed and approved by the Army Corps of Engineers. The flood control operations need to be included in the relicensing permit with FERC to provide a meaningful benefit to the City of Sultan and Snohomish County residents within the adjacent Sky Valley region.

The City of Sultan recognizes PUD's efforts to balance multiple needs including water supply, instream flows for riparian habitat, power generation, and flood control. The Project offers multiple benefits to Snohomish County. The City of Sultan and Snohomish County believe it is possible to improve flood control and habitat restoration by analyzing alternatives to maximize flood control and formalizing flood control operations.

Thank you for your consideration of our request.

Sincerely,



Mayor Carolyn Eslick

Cc: City Council  
Chief Merlin Halverson, Fire District 5  
Dan Chaplik, Sultan School District  
David Brookings, Director Snohomish County Surface Water Management