

**SULTAN PLANNING BOARD  
AGENDA ITEM COVER SHEET**

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ITEM NO: A-3

DATE: August 13, 2009

SUBJECT: Resolution 09-14  
Henry M. Jackson Hydroelectric Project and  
Culmback Dam Safety

CONTACT PERSON: Deborah Knight, City Administrator

**ISSUE:**

The issue before the City Council is to:

1. Approve Resolution 09-14 (Attachment A).
2. Support the July 29, 2009 letter (Attachment A - Exhibit A) to the Snohomish County PUD No. 1 Board of Commissioners, urging the commissioners to recognize PUD's obligation to provide funding for installation and long-term maintenance of a dam safety warning program to protect Sultan from potential failure of the Culmback Dam.

**STAFF RECOMMENDATION:**

Authorize the Mayor to sign Resolution 09-14 and support the July 29, 2009 letter to the Snohomish County PUD No. 1 Board of Commissioners.

**SUMMARY:**

Current Negotiations with PUD

The city and Fire District 5 have been meeting irregularly for the past year with representatives from PUD. The purpose of the meetings was to discuss PUD's desire to construct habitat enhancement projects on city property to satisfy requirements in a proposed settlement agreement to relicense the Henry M. Jackson Hydroelectric Project.

During the negotiation meetings, the city and fire district have been urging PUD to provide an operable dam safety warning system. Since the beginning of the relicensing process in 2005 PUD representatives have resisted on the basis that there is no relicensing requirement for a warning system.

Mayor Carolyn Eslick and Fire Chief Merlin Halverson met with PUD representative on July 23, 2009 to continue negotiations. The PUD offered to pay the City to acquire city land and easements for habitat enhancements. The city could use the funds to purchase, install and maintain a warning system. The city and fire district maintain land acquisition for habitat enhancements and an operable warning system are two separate issues. The PUD should provide separate funding for a warning system.

#### Joint Letter from Emergency Preparedness Alliance

At this point, members of the Sultan Basin Emergency Preparedness Alliance created by Resolution 06-03 are recommending a joint letter to the Snohomish County PUD board of commissioners. The letter (Attachment A – Exhibit A) requests the commissioners consider an organizational and financial commitment to a warning system that is dedicated to protecting the lives and property of people living below the dam.

#### Settlement Agreement

The settlement agreement between PUD and all its stakeholders in the relicensing process is nearing completion. The signing ceremony for the settlement agreement is scheduled for mid-September. The city has until the Council meeting on September 10, 2009 to make a decision whether to participate in the settlement agreement. Fire District 5 is taking the lead in the warning system negotiations because of the city's participation in the settlement negotiations and the confidentiality agreement approved by the city council in April 2009.

The city should maintain open communications with PUD. Negotiations with PUD are continuing to complete the off-license agreement for city land and easements as a part of the settlement agreement. The city needs to keep urging PUD to commit funding to install and maintain a dam warning system.

City staff recommend the Council authorize the Mayor to sign Resolution 09-14 and support the joint letter from members of the Sultan Basin Emergency Preparedness Alliance.

#### **BACKGROUND:**

#### Sultan Basin Drainage Emergency Preparedness Alliance

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 (Attachment B). Until August 2008, the PUD was unresponsive to the community's requests.

### Past Negotiations with PUD

In August 2008, 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 met 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 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 through the FERC relicensing process. (Note: PUD was unable to provide FEMA with the guarantees necessary to formalize flood control operations.)
- 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.

Since November, the city, fire district and PUD representatives have met several times and exchanged negotiation proposals with no conclusion to the discussions.

### Next Steps

In March 2009, the city provided comments to FERC on the proposed Preliminary License Proposal. The city has been a party to the settlement negotiations with PUD and other stakeholders since April 2009. The settlement negotiations are nearing completion and PUD plans to submit their license proposal to the federal energy regulatory commission (FERC) in September. PUD would like to have all its off-license agreements finalized at the time they submit their proposal to FERC. If the city and PUD don't complete their negotiations, there will be an opportunity to the city to comment on the license proposal during the public comment period.

### **FISCAL IMPACT:**

There is no fiscal impact to authorize the mayor to sign Resolution 09-14 . However, it may be necessary for the City to contract with an attorney, hydrologic consultant or other specialist(s) to represent Sultan's interests. This is an unfunded budget item and would be discussed with the City Council. Depending on the scope of work, legal representation could be done in-house by the city attorney or an outside consultant could be hired. An out-side consultant could cost anywhere from \$2,000 to \$4,000.

### **ALTERNATIVES:**

1. Approve Resolution 09-14 and the July 29 letter to Snohomish County PUD. This action implies the city council supports the position that the Snohomish County PUD has an obligation to provide funding for installation and long-term maintenance of a dam safety warning program to protect Sultan from potential failure of the Culmback Dam.
2. Do not approve Resolution 09-14 and the July 29 letter to Snohomish County PUD and direct staff to areas of concern. This action implies the city council has questions and/or concerns regarding the proposed Resolution and attached letter. The council may want to suggest changes prior to adoption.
3. Do not approve Resolution 09-14 and the July 29 letter to Snohomish County PUD. This alternative suggests the council is not prepared to take

action on the Resolution or does not support the position that PUD has an obligation to provide a dam warning system to ensure public safety.

**RECOMMENDED ACTION:**

1. Approve Resolution 09-14 (Attachment A).
2. Support the July 29, 2009 letter (Exhibit A) to the Snohomish County PUD No. 1 Board of Commissioners, urging the Commissions to recognize the obligation to provide funding for installation and long-term maintenance of a dam safety warning program to protect life and property of the citizens of Sultan from potential failure of the Culmback Dam

**ATTACHMENTS:**

- A – Resolution 09-14
- B – Resolution 06-03

**CITY OF SULTAN  
WASHINGTON  
RESOLUTION NO. 09-14**

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**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SULTAN, WASHINGTON, ENCOURAGING SNOHOMISH COUNTY PUBLIC UTILITY DISTRICT NO. 1 TO RECOGNIZE ITS OBLIGATION TO PROVIDE FUNDING FOR INSTALLATION AND LONG-TERM MAINTENANCE OF A DAM SAFETY WARNING PROGRAM TO PROTECT LIFE AND PROPERTY OF THE CITIZENS OF SULTAN FROM POTENTIAL FAILURE OF THE CULMBACK DAM**

WHEREAS, the City of Sultan is within the inundation zone of the Culmback Dam and Henry M. Jackson Hydroelectric project and PUD predicts a dam failure would result in a 45 foot wall of water and debris threatening the lives of thousands within one hour; and

WHEREAS, the Snohomish County PUD No. 1 (PUD) has responsibility for design, construction, inspection, maintenance, mitigation of potential hazards, emergency action planning, and security of the Culmback Dam and Henry M. Jackson Hydroelectric Project; and

WHEREAS, dam failures regularly cause loss of life and property damage; and

WHEREAS, dam safety programs are critical to public safety and protection of the environment; and

WHEREAS, the siren system provided by PUD more than 20 years ago is no longer operable; and

WHEREAS, in 2005, Snohomish County PUD initiated the formal relicensing process for the Henry M. Jackson Hydroelectric Project; and

WHEREAS, Snohomish County PUD has been conducting studies and consulting with stakeholders on measures that best address the continued effects of the project operation on natural and social resources in the project area; and

WHEREAS, the Culmback Dam will be close to 100 years old at the end of the proposed relicense period in 2050; and

WHEREAS, more than 24,000 people are expected to be living in the Sky Valley by 2030 and would be affected by a failure of the Culmback Dam; and

WHEREAS, the City of Sultan passed Resolution 06-03 to join with the Sultan School District, Valley General Hospital District, Snohomish County Fire District 5 and the City of Monroe on March 9, 2006 to form the Sultan Basin Emergency Preparedness Alliance to negotiate relicensing issues with Snohomish County PUD; and

WHEREAS, on March 16, 2006 Fire District 5 notified the Federal Energy Regulatory Commission on behalf of area stakeholders concerns regarding the safety of residents and business owners living in the inundation area if the Culback Dam failed; and

WHEREAS, from the beginning of the relicensing process, representatives of Snohomish County PUD have been reluctant to acknowledge PUD's long-term obligation to provide and maintain a warning system sufficient to mitigate the risk associated with a dam failure; and

WHEREAS, the relicensing process is reaching its conclusion with millions of dollars dedicated to salmon habitat, recreation and off-license agreements and there is still no commitment from PUD to provide and maintain a dam safety warning system;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SULTAN, WASHINGTON, DO RESOLVE AS FOLLOWS:

**Section 1.** The City Council supports the July 29, 2009 letter (Exhibit A) to the Snohomish County PUD No. 1 Board of Commissioners, prepared on behalf of the Sultan Basin Emergency Preparedness Alliance, urging Snohomish County PUD to recognize its obligation to provide funding for installation and long-term maintenance of a dam safety warning program to protect life and property of the citizens of Sultan from potential failure of the Culmback Dam.

PASSED BY THE CITY COUNCIL AT A REGULAR MEETING THEREOF ON THE \_\_\_\_\_ DAY OF \_\_\_\_\_, 2009.

CITY OF SULTAN

By: \_\_\_\_\_  
Carolyn Eslick, Mayor

ATTEST:

By: \_\_\_\_\_  
Laura Koenig, City Clerk

APPROVED AS TO FORM:

By \_\_\_\_\_  
Margaret King, City Attorney

# Emergency Preparedness Alliance Sultan Basin Drainage

## EXHIBIT A



July 29, 2009

Snohomish County PUD No. 1  
Board of Commissioners  
2320 California Street  
Everett WA 98201

Dear Commissioners:

Attached is a letter to the Federal Energy Regulatory Commission (FERC) written in 2006 on behalf of the organizations therein listed. As you will see it is a request that the PUD provide a warning system below Culmback Dam.

Although all County residents enjoy the benefits provided by the dam, only a handful are in danger of annihilation should the dam fail. Even our schools and children would be destroyed. Given the terrible potential, this request hardly seems selfish.

We understand that you are meticulous in caring for the dam and that the probabilities of failure are remote; it cannot be denied however, that a dam failure is possible and the results tragic. Every five years the Federal Energy Regulatory Commission requires and monitors a drill designed to test our level of preparedness for this very possibility.

From the beginning of this re-licensing process your representatives have resisted on the basis that there is no requirement for a warning system. We have persisted believing that in the final analysis, they would recognize that PUD customers will find wisdom and equity in a few cents dedicated to protect the lives of people living below the dam.

Unfortunately, we see the process nearing its conclusion with millions of dollars dedicated to salmon habitat, recreation and off license agreements and still no commitment to even a small fraction of that amount for an early warning system.

We therefore wish to move our pleadings to you, the Board of Directors. We ask that you consider our request not on the basis of what is required, but rather what is right. This discussion has been ongoing for several years and we would like to reach resolution.

Our spokesperson, Snohomish County Fire District 5, Chief Merlin Halverson, is available to provide information and further discussion as you wish. Thank you for your consideration. We look forward to hearing from you.

# Emergency Preparedness Alliance Sultan Basin Drainage



## Snohomish County Fire District 5

\_\_\_\_\_  
Chairman Mike Ingalls

\_\_\_\_\_  
Date

\_\_\_\_\_  
Commissioner Steve Fox

\_\_\_\_\_  
Date

\_\_\_\_\_  
Commissioner Roger Knowlton

\_\_\_\_\_  
Date

# Emergency Preparedness Alliance Sultan Basin Drainage



## Sultan School District School Board

\_\_\_\_\_  
Chairman Craig Roesler

\_\_\_\_\_  
Date

\_\_\_\_\_  
Vice Chair Patty Fountain

\_\_\_\_\_  
Date

\_\_\_\_\_  
Board Member Steve Fox

\_\_\_\_\_  
Date

\_\_\_\_\_  
Board Member Tracy Cotterill

\_\_\_\_\_  
Date

\_\_\_\_\_  
Board Member Russ Sumpter

\_\_\_\_\_  
Date

# Emergency Preparedness Alliance Sultan Basin Drainage



## Mayor of Sultan

\_\_\_\_\_  
Mayor Carolyn Eslick

\_\_\_\_\_  
Date

## Sultan City Council

\_\_\_\_\_  
Council Member Bruce Champeaux

\_\_\_\_\_  
Date

\_\_\_\_\_  
Council Member Steve Slawson

\_\_\_\_\_  
Date

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Council Member Ron Wiediger

\_\_\_\_\_  
Date

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Council Member Kristina Blair

\_\_\_\_\_  
Date

\_\_\_\_\_  
Council Member Jeffery Beeler

\_\_\_\_\_  
Date

\_\_\_\_\_  
Council Member Jim Flower

\_\_\_\_\_  
Date

\_\_\_\_\_  
Council Member Sarah Davenport-Smith

\_\_\_\_\_  
Date



## Snohomish County Fire District #5

P.O. Box 149 • 304 Alder Street • Sultan • Washington • 98294  
Phone: (360) 793-1179 Fax: (360) 793-1932

March 16, 2006

Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E. Room 1A  
Washington D.C. 20426

**Subject: Project No.2157-167-Washington Henry M. Jackson Hydroelectric Project  
Snohomish County Public Utility District No. 1 and City of Everett**

Dear Secretary Salas:

Included are an original and eight copies of the statement I am submitting on behalf of Snohomish County Fire District No.5, Sultan School District No.311, Valley General Hospital District No.1 and the City of Sultan. Copies are also being sent to Snohomish County PUD No.1 and the City of Everett, co-licensees.

No dispute exists as to the potential destruction and loss of life should the Culmback Dam fail. Little evidence can be offered that age degradation, terrorism, climate changes and geological events do not add to the obvious dangers of a 262 foot earthen wall, holding back 154,900 acre/feet of water.

We are hopeful that the re-licensing process will be as sensitive to the welfare of the human population living below the Dam as it is to the fish and other wildlife. Recent national tragedies should teach us that honest preparation is a better and less expensive option than the head in the sand approach.

The cost of providing improvements to the safety of those living below the Dam would be negligible to the beneficiaries. An agreement on modernized safety systems should be concluded before the Jackson Hydroelectric Project is re-licensed.

Thank you for your consideration.

Sincerely,

Merlin Halverson  
Fire Chief



## Snohomish County Fire District #5

P.O. Box 149 • 304 Alder Street • Sultan • Washington • 98294  
Phone: (360) 793-1179 Fax: (360) 793-1932

March 16, 2006

Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E. Room 1A  
Washington D.C. 20426

**Subject: Project No.2157-167-Washington Henry M. Jackson Hydroelectric Project  
Snohomish County Public Utility District No. 1 and City of Everett**

Dear Secretary Salas:

The following considerations regarding the re-licensing of the Henry M. Jackson Hydroelectric Project are submitted on behalf of the Sultan Basin Emergency Preparedness Alliance. The Alliance is an organization of public agencies including Sultan School District No. 311, Valley General Hospital District No. 1, City of Sultan and Snohomish County Fire District No. 5. Failure of the dam would have a devastating impact on these agencies and their constituents.

Although not specifically enumerated in the scoping document, representatives of the Federal Energy Regulatory Commission were unequivocal in their statements to attendees at the scoping meetings, that *safety is the highest priority* for the Commission. The Alliance is therefore confident that the Commission will find the following helpful and productive.

### **Background**

The City of Everett built the Culmback Dam on the Sultan River in 1961 to create a reservoir for the city's water supply. In 1982 PUD No.1 raised the dam and added hydroelectric generation. Today the 262 foot earthen dam and reservoir provide 75% of the potable water and 5% of the electricity to Snohomish County, Washington.

The Culmback Dam and the Spada Lake Reservoir created by the dam are approximately 16 miles and 1250 feet above Sultan. In the event of a dam failure information provided by Snohomish County PUD No.1 predicts that a 45 foot wall of water and debris would travel down the Sultan River into the City of Sultan within one hour. The potential destruction of property and loss of life in the City and surrounding Sultan Basin Drainage is staggering.

### **Discussion**

At the point of re-licensing, the dam will be 50 years old; by the end of the licensing period, 100 years old. Much has changed in 50 years and one can expect even greater changes in another 50 years. It is likely that if the dam were built today it would be built to more stringent standards. Regardless of original design standards, the fact that it is aging is of itself reason for concern.

In 1960 the population below the dam in the inundation zone could have been measured in the hundreds; today there are 1500 children in Sultan Schools alone. Dam failure would threaten the lives of thousands within one hour. Schools, fire and police stations, a state prison and a regional hospital are all within the inundation area. Vital services relied upon during disasters would be lost not only to those within the inundation zone but in much of Eastern Snohomish County.

When the dam was constructed there was less information and likely less interest in geological faults. Experts agree that the Puget Sound area will experience devastating earthquakes in the near future. New faults are being discovered inland, raising concern that a fault may exist under or near the dam, dramatically increasing the risk of dam failure during a quake.

There was no threat of terrorism in 1961 or in 1982 when the Dam was raised by PUD. Terrorism is an unfortunate reality of our lives today and into the foreseeable future. One of the foremost concerns of Homeland Security today is the defense of our infrastructure, *dams in particular*. The Culmback Dam has no realistic defense against a terrorist attack.

Warning systems intended to provide notice of dam failure are inadequate and lack redundancy. The system relies on a microwave feed and a phone tree with no immediate on site contact. Because there is no deterrent to a terrorist attack, the need for reliable notification of failure is essential. Dam failure precipitated by natural events may be anticipated. Destruction of the dam from terrorism on the other hand may not be recognized for some time. The speed of the advancing wave makes reliable and immediate notification central to any evacuation attempts.

The Alliance has undertaken initiatives directed at reducing life loss in the event of a dam failure. Naturally, our most urgent concern is the safety of our children. Evacuation trails were constructed for the evacuation of our schools. It is now possible to walk our school population up the hill to high ground in 20 minutes. Even this plan, however, relies on rapid notification of dam failure. The present situation provides little hope of evacuation when children are not in school.

### **Recommendations**

- A. Monitoring for Dam failure and notification of emergency services must be improved. An outside organization expert in failsafe systems should conduct a review of technology and systems now in use and provide a blueprint for construction of a reliable system with updated technology and redundancy.
- B. Security considerations should be brought in line with the threats of today. Experts on security with the assistance of Homeland Security should be consulted and recommendations implemented.
- C. A public warning system similar to those used in areas subject to tsunamis or volcanic eruptions should be installed throughout the inundation area. Such a system would include at least audible warning sirens and pre-planned escape routes with appropriate signage.
- D. A seismic study should be undertaken to determine the vulnerability of the Dam. This study should be conducted by the University of Washington or other such institution with knowledge of the local geology. Information gathered should be arranged and documented in a fashion that would be useful to administrators, emergency responders, governing councils and others responsible for planning and executing emergency evacuation procedures.

- E. Improvements in safety of the Jackson Hydroelectric Project have to be made. It is appropriate that they be done at the expense of the rate payers not the tax payers. There are hundreds of thousands benefiting from the project and tens of thousands threatened. The cost of improvements would be a small burden on those benefiting from the Project.

### **Closing**

Prior to re-licensing of the Jackson Hydroelectric Project safety concerns of those living in the inundation area need to be addressed. Recognizing the changes in the past 50 years and anticipating as much as possible the next 50 years we have identified terrorism, population growth, renewed seismic awareness, age degradation and modern technological opportunities as some but not all of the reasons for renewed concern.

It is not the intent of this document to be an exhaustive study of the need for strengthened safety and security measures. We believe the events of recent history are sufficient evidence to support the need for improved prevention and preparation.

The threat to lives and property of those in the inundation zone is sobering. The cost of losing an infrastructure as vital as the Culmback Dam providing 75% of Snohomish County's water supply and 5% of the County's electricity is enormous. The recommendations of the Sultan Basin Emergency Preparedness Alliance are a small investment given what is at stake.

**City of Sultan  
Resolution 06-03**

**WHEREAS**, the Sultan Basin Drainage provides drainage for the Sultan and Skykomish Rivers extending west from Startup to the Fern Bluff Road, South to the King County line and north to the Sultan Basin Ridge, and

**WHEREAS**, in addition to a rapidly growing population the Sultan Basin Drainage Community is home to 1600 students in three schools, and

**WHEREAS**, the community contained by the Sultan Basin Drainage is a unique community with limited ingress and egress easily isolated and exceptionally vulnerable to natural and man made disasters including catastrophic flooding, and

**WHEREAS**, unique to the Sultan Basin, is the potential for a catastrophic failure of the Culmback Dam. Failure of this dam would, in one hour, bring an estimated 45 foot wall of water into Sultan destroying all in its path, and

**WHEREAS**, these distinctive characteristics require a high level of self reliance and exceptional coordination and cooperation among government agencies within the Sultan Basin Drainage, and

**WHEREAS**, it is understood that through coordinated effort these concerns can most effectively be addressed to the satisfaction of all; Therefore

**BE IT RESOLVED** that an advisory group to be known as the Sultan Basin Emergency Preparedness Alliance (SBEPA) be formed for the purpose of planning, coordinating, negotiating, and advising governing councils on matters of emergency preparedness as they emerge and need attention, and

**BE IT FURTHER RESOLVED**, that membership in SBEPA shall be as follows:

Sultan School District 311	1 member
Hospital District 1	1 member
City of Sultan	2 members
City of Monroe	2 members
Fire District 5	2 members

Each member agency shall appoint in writing their representative(s) and one alternate.

**BE IT FURTHER UNDERSTOOD**, that SBEPA may, on occasion, as the need arises, adjust its membership to include other public agencies should the focus of SPEBA require other participation.

**BE IT FURTHER RESOLVED**, that SBEPA will organize under simple by-laws and/or operating procedures established at the first formal meeting of the Alliance. Operating procedures shall at a minimum prescribe working process, meeting schedules, leadership and communication protocol (internally and with the public) and

**BE IT FURTHER RESOLVED**, that the Culmback Dam and Jackson Hydro Electric Project Federal Re-licensing initiative undertaken by Snohomish County PUD and The City of Everett require thoughtful response by responsible agencies in the Sultan Basin Drainage, and

**BE IT FURTHER RESOLVED**, that SPEBA be specifically authorized to negotiate re-licensing issues with Snohomish County PUD #1 and The City of Everett on behalf of The City of Sultan, The Sultan School District #311, Snohomish County Fire District Five and Hospital District #1. Agreements forthcoming from such negotiations will be subject to the approval of each member agency's governing council, and

**BE IT FURTHER RESOLVED**, that SPEBA will operate in an environment of open accessible decision making. Other entities will be invited and encouraged to take part in planning and coordination discussions. The Alliance will through participation and consensus building provide stakeholders with the best possible decision-making process.

REGULARLY ADOPTED by the City Council March 9, 2006

City of Sultan

  
\_\_\_\_\_  
Benjamin Tolson

**GOVERNING COUNCIL MEMBERS**

\_\_\_\_\_  
Bruce Champeaux

\_\_\_\_\_  
Steve Slawson

\_\_\_\_\_  
Ron Wiediger

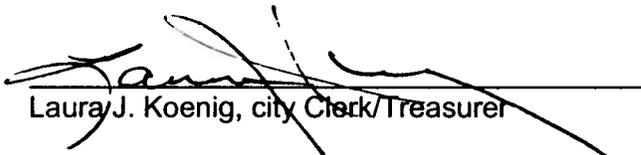
\_\_\_\_\_  
John Seehuus

\_\_\_\_\_  
Jim Flower

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Kristina Blair

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Derek Boyd

ATTEST:

  
\_\_\_\_\_  
Laura J. Koenig, city Clerk/Treasurer

Approved as to form:

\_\_\_\_\_  
Thom Graafstra, City Attorney