



Skagit County Board of Commissioners

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September 15, 2020

TO: Federal Regulatory Commission (FERC) by e-filing only

**RE: Skagit River Hydroelectric Project (FERC No. 553-235)
Comments on Scoping Document 1**

I. Introduction and Endorsement of Study Requests.

This comment letter pertains to the ongoing relicensing of the Skagit River Hydroelectric Project, FERC No. 553-235, owned by the City of Seattle (the “**Project**”).

We have a strong relationship with the tribal governments located within Skagit County. The Upper Skagit Indian Tribe (“**Upper Skagit**”) is requesting a comprehensive fish passage study, along with a number of other study requests relevant to hydrology, geomorphology, riverine habitat, and instream flows. We have fully participated in the various aspects of the relicensing process with Seattle City Light (“**City**”), and have furnished input that Upper Skagit has taken into consideration. We stand with Upper Skagit, and endorse their study requests.

We also endorse and support the Flood Storage Timing Study Request submitted by the Skagit Dike District Partnership (“**SDDP**”) and the Skagit Drainage and Irrigation District Consortium (“**SDIDC**”), organizations that taken together represent the vast majority of diking, drainage and irrigation districts within Skagit County, which, among other things, protect the population and economic centers on the Skagit Delta from flood risk. By providing trend analysis additive to the City’s proposed Operational Model Study Plan, the Flood Storage Timing Study Request will help these districts anticipate impacts that climate change poses to the Project dams’ operational capacity during flood events.

II. Summary of Comments.

To summarize our comments:

- Dam Failure Early Warning System. The existing dam failure early warning system in Eastern Skagit County is inadequate, relying largely on a continuous ringing of the local fire district’s sirens, which ring numerous times a day on most days for other reasons, inuring citizens to an actual alert of potential dam failure. To the extent not accomplished voluntarily, the City should be required to install a more comprehensive and effective dam failure early warning system in Eastern Skagit County. This should be coordinated with the early warning system that Puget Sound Energy installed as a FERC license condition for its dams on the Baker River. To that end, we are submitting a study request that seeks to analyze the necessary attributes of a safe and effective dam failure early warning system in Eastern Skagit County.
- City Mitigation Lands. Existing and new mitigation lands within the Project area and the County, which the City has taken off the local tax rolls pursuant to a state law tax exemption for municipal entities, are and will continue to shift the property tax burden to a decreasing number of properties, as well as creating impacts on local Skagit government arising from inadequate management of the City Mitigation Lands. This should be addressed through better management protocols and payment