

APPENDIX E

**AGENCY AND PUBLIC
CONSULTATION**

FOREWORD

On August 22, 1984, the Federal Energy Regulatory Commission (FERC) ordered the co-licensees for Project No. 2157 to revise the plan proposed for terrestrial resources mitigation (28 FERC ¶ 62,249). In submitting a revised plan, "[D]ocumentation of agency consultation on the mitigative plan, and agency comments on the adequacy of the plan, shall be included in the filing" (FERC Order Paragraph [C]). This appendix to the Wildlife Habitat Management Plan prepared by Public Utility District No. 1 of Snohomish County and the City of Everett, Washington, the co-licensees for the Henry M. Jackson Hydroelectric Project, provides that documentation to the FERC.

Appendix E contains about 50 separate written communications between the District, acting as the representative for the co-licensees, and resource agencies. Public meetings were also held to provide information to the general public and allow for an opportunity to receive public comment as well as formal consideration for the proposed plan by elected officials (the District's Board of Commissioners and the City's Mayor and Council). Additionally, numerous telephone calls occurred between the principals, although no telephone call log or record of conversations has been provided. The written record, excluding telephone consultations, should be sufficient for the intent and purposes of the FERC Order for which Appendix E has been prepared and submitted to the FERC.

TABLE OF CONTENTS

E.1 CONSULTATION DURING PLAN DEVELOPMENT

<u>DATE</u>	<u>FROM</u>	<u>TO</u>	<u>SUBJECT</u>	<u>PAGE</u>
8/21/85	District	FERC	time extension	E-1
8/27/85	District	WDG, USFWS, Tribes, USFS	meeting notice	E-4
9/27/85	USFS	District	plan approach	E-6
10/16/85	District	WDG, USFWS, Tribes, USFS	update	E-7
10/17/85	USFWS	District	plan approach	E-11
10/21/85	District	FERC	conceptual outline	E-12
10/24/85	District	WDG, USFWS, Tribes, USFS	consultants	E-14
10/25/85	USFS	District	plan approach	E-14
10/30/85	PUD News	Public	mitigation plan	E-16
11/05/85	Herald	Public	mitigation plan	E-16
1/15/86	District	WDG, USFWS, Tribes, USFS	plan outline	E-17
2/12/86	District	WDG, USFWS, Tribes, USFS	meeting notes	E-18
3/07/86	District	WDG, USFWS, Tribes, USFS	scope of work	E-20
3/19/86	District	WDG, USFWS, Tribes, USFS	telecon notes	E-32
3/20/86	District	WDG, USFWS	public access	E-34
5/07/86	District	WDG, USFWS, Tribes, USFS	public meeting	E-38
7/02/86	District	WDG, USFWS, Tribes, USFS	meeting notice	E-38
7/17/86	District	WDG, USFWS, Tribes, USFS	meeting notes	E-39
7/23/86	District	Tribes	meeting notes	E-45
8/06/86	District	DNR	state lands	E-45
8/06/86	District	WDG, USFWS, Tribes, USFS	Lost Lake	E-47
8/11/86	District	WDG, USFWS, Tribes, USFS	public meetings	E-49

<u>DATE</u>	<u>FROM</u>	<u>TO</u>	<u>SUBJECT</u>	<u>PAGE</u>
8/20/86	District	WDG, USFWS	consultation	E-54
9/03/86	Consultant	WDG, USFWS, Tribes, USFS	HEP HSI models	E-55
9/04/86	District	WDG, USFWS, Tribes, USFS	time extension	E-57
9/08/86	DNR	District	state lands	E-58
9/19/86	Consultant	WDG, USFWS, Tribes, USFS	deer HEP model	E-59
10/10/86	District	Tribes, USFS	meeting notes	E-60
10/10/86	District	WDG, USFWS	meeting notes	E-60
2/19/87	Consultant	WDG, USFWS, Tribes, USFS	draft plan	E-64
3/05/87	District	WDG, USFWS, Tribes, USFS	draft HEP results	E-65
3/11/87	District	WDG, USFWS, Tribes, USFS	meeting notes	E-66
3/23/87	USFS	District	draft plan	E-69
4/02/87	District	WDG, USFWS, Tribes, USFS	meeting notes	E-70
4/02/87	SCSA	District	Lost Lake	E-73
4/20/87	WDG	District	draft plan	E-73
4/27/87	USFWS	District	draft plan	E-75
4/29/87	DNR	District	state lands	E-78
5/12/87	SSC	District	Lost Lake	E-78
6/08/87	District	WDG, DNR, USFWS, USFS, Tribes	meeting notice	E-79
6/16/87	District	WDG, DNR, USFWS, USFS, Tribes	comment response	E-79
6/18/87	District	DSHS, Health	water quality	E-97
7/06/87	DSHS	District	water quality	E-97
7/10/87	District	WDW, DNR, USFWS, USFS, Tribes	meeting notes	E-98
7/24/87	District	WDW, USFWS, USFS, City	public access	E-109

<u>DATE</u>	<u>FROM</u>	<u>TO</u>	<u>SUBJECT</u>	<u>PAGE</u>
8/05/87	District	WDW, DNR, USFWS, USFS, Tribes	meeting notes	E-111
8/18/87	District	WDW, DNR, USFWS, USFS, Tribes	monitoring program	E-123
8/26/87	PAS	District	Lost Lake	E-124
8/28/87	District	WDW, DNR, USFWS, USFS, Tribes	meeting notes	E-125
9/18/87	District	WDW, DNR, USFWS, USFS, Tribes	meeting notes	E-131
9/21/87	District	USFS	meeting notes	E-137
9/25/87	District	WDW, DNR, USFWS, USFS, Tribes	time extension	E-139
9/25/87	District	SSC	Lost Lake	E-140
10/02/87	District	WDW, DNR, USFWS, USFS, Tribes	settlement offer	E-140
10/14/87	District	WDW, DNR, USFWS, USFS, Tribes	meeting notice	E-145
10/23/87	USFS	District	draft plan	E-145
11/10/87	District	WDW, DNR, USFWS, USFS, Tribes	meeting notice	E-146
12/08/87	District	DNR	Williamson Creek	E-147
12/21/87	USFWS	District	draft plan	E-148
1/04/88	District	WDW, DNR, USFWS, Health, USFS, Tribes, DSHS, WDLI	final plan	E-148
2/02/88	District	WDW, DNR, USFWS, USFS, Tribes, WDLI	meeting notes	E-149

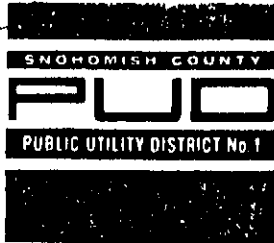
E.2 COMMENTS ON FINAL DRAFT PLAN

<u>DATE</u>	<u>FROM</u>	<u>TO</u>	<u>SUBJECT</u>	<u>PAGE</u>
1/07/88	Health	District	draft plan	E-152
1/19/88	DSHS	District	draft plan	E-152
2/10/88	DNR	District	draft plan	E-153
2/11/88	Tribes	District	draft plan	E-153
2/12/88	USFWS	District	draft plan	E-154
2/12/88	Tribes	District	draft plan	E-155
2/16/88	USFS	District	draft plan	E-156
2/26/88	WDLI	District	draft plan	E-157
3/01/88	WDW	District	draft plan	E-158
3/11/88	District	DNR	draft plan	E-159
3/15/88	District	WDLI	draft plan	E-160
3/15/88	District	WDW	draft plan	E-160
3/15/88	District	USFWS	draft plan	E-161
4/29/88	District	Tribes	draft plan	E-162

E.3 CONSULTATION MEETINGS

E-167

District - Snohomish County PUD #1
 FERC - Federal Energy Regulatory Commission
 WDG - Washington Department of Game (until July 1987; now WDW)
 USFWS - United States Fish and Wildlife Service
 Tribes - Tulalip Indian Tribes
 USFS - United States Forest Service
 PUD News - Snohomish County PUD #1 Commission Newsletter
 Herald - Everett Herald
 DNR - Washington Department of Natural Resources
 Consultant - Beak Consultants Incorporated
 DSHS - Washington Department of Social Health Services
 SCSA - Snohomish County Sportsmen's Association
 SSC - Sultan Sportsmen's Club
 Health - Snohomish County Health District
 WDW - Washington Department of Wildlife
 City - City of Everett, Washington
 PAS - Pilchuck Audubon Society
 WDLI - Washington Department of Labor and Industries



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

August 21, 1985
 PUD-16509

Kenneth F. Plumb, Secretary
 Federal Energy Regulatory Commission
 825 North Capitol St. N.E.
 Washington, D.C. 20426

Dear Mr. Plumb:

Henry M. Jackson (Sultan River) Project No. 2157
License Article 53 - Request for 60-Day Extension

The Licensees on February 9, 1983, filed a Revised Exhibit S for the Project pursuant to Article 53 of the Commission Order Amending License issued on October 16, 1981 (17 FERC ¶ 61,056). Subsequently, on August 22, 1984, the Commission issued an Order Approving Aquatic Resources Mitigative Plan and Requiring Revised Terrestrial Resources Mitigative Plan (28 FERC ¶ 62,249). This Order required submittal of a revised terrestrial resources mitigative plan to protect and enhance terrestrial resources in the Sultan Project area within one year of the date of the order.

Since the time when the Licensees submitted the Revised Exhibit S and the Commission subsequently issued its Order on the Plan, a major judicial decision has caused reconsideration of some key elements of that Plan by the Licensees. The mitigation proposal submitted to the resource agencies on November 15, 1982, was based heavily on using lands of the United States. These lands in the Mt. Baker-Snoqualmie National Forest are administered by the U.S. Forest Service. It was the Licensees' intention to pursue use of the project's power withdrawal lands within that Forest for terrestrial mitigation purposes. However, due to the Escondido decision, the Licensees have re-evaluated that concept and concluded it would not be fruitful in light of the Forest Service's position regarding the project boundary/power withdrawal lands.

The Commission has been advised of this development in part, through the Licensees' recent License Article 58 submittal. Both the transmittal letter and Exhibit A discussed the project boundary and lands of the United States. Pursuant to that issue and the matter at hand, the Licensee has requested the Forest Service to state its intentions about Mt. Baker-Snoqualmie National Forest Lands in the Sultan River Basin (Attachment I). A reply is pending.

In anticipation that the Forest Service intends to exchange out of the Sultan River Basin and therefore, desires a minimum project boundary and encumbrance on lands which it administers, the Licensees initiated a search

123U

Kenneth F. Plumb, Secretary
 FERC

-2-

August 21, 1985
 PUD-16509

for other potential lands on which to base a terrestrial resources mitigation plan. Keeping in mind the resource agencies requirement of "in-kind" and "in-basin" types of lands/areas, as well as their concern about firmness or assurance of a commitment by the landowner to proposed land management plans designed to protect or enhance habitat and dependent terrestrial resource production, some candidate lands have been identified.

The Licensee has identified potential candidate areas for terrestrial resource mitigation in substitution for earlier proposed lands in the National Forest surrounding Spada Lake. However, the licensee has not had sufficient time for essential consultations with the Washington Department of Game, the U.S. Fish and Wildlife Service, the U.S. Forest Service and the Tulalip Tribes nor to obtain required documentation of agency comments on the adequacy of the plan for inclusion in this filing.

Accordingly, the Licensee requests a 60-day extension to complete the present phase of work on the terrestrial resource mitigative plan. This extension request has been coordinated with the resource agencies. They will be advising the Commission directly as to their position regarding the requested extension and proposed course of action by the Licensee concerning the Commission's Order.

The need for additional time is necessitated also by the heavy workload on limited environmental staff of the District with other regulatory obligations and related events concerning the project. Specifically, the District recently made submittals on License Articles 57 and 58. The 5-year inspection is currently in progress. Implementation of the aquatic resources program has seven consultant contracts in progress simultaneously. Much of that work is now entering the mitigation consideration phase. Recently, the Commission initiated its Cluster Impact Assessment Procedure for the Snohomish River Basin, in which the District is a participant by providing technical assistance. The Licensee is initiating coordination with the U.S. Forest Service on resolving the project boundary issue involving lands of the United States. This issue as stated earlier has significant bearing on the siting of lands for terrestrial wildlife mitigation purposes, and recreation development - Exhibit R (Article 52). This is only a partial listing of environmental activities pending or in progress to fulfill regulatory obligations.

Additionally, the Licensee is confronted with a practical problem: obtaining timely review of project matters by the resource agencies. No criticism whatsoever is intended about agency performance on the Jackson Project. However, the Licensee must consult with and obtain agency views. The number of agencies involved and their heavy work schedule often require re-scheduling work, coordinating with other activities or placing ongoing efforts on "hold" until agency comments are received.

Furthermore, many regulatory obligations require lengthy consultation for successful completion. Several of the Project's environmental issues are interrelated which adds to the complexity of solution. For example, settlement of the project boundary with the U.S. Forest Service will establish the amount of area riparian to the reservoir under Licensee control and

123U

E-1

potentially available for mitigation purposes. However, mitigation planning must be coordinated with the recreation plan (and vice versa) as submitted to the Commission. (P-2157-011, Notice of Application filed with the Commission, April 25, 1983). Time will be required to conclude negotiations with the U.S. Forest Service on the project boundary in consultation with the other agencies.

For these reasons, the Licensee requests an initial 60-day extension. During this time extension, the following events are scheduled and expect to be accomplished.

1. The Licensee will draft a concept plan proposal for a revised terrestrial resource mitigative plan. This proposal will be submitted to the resource agencies for their review and comment.
2. The Licensee will conduct field trips to candidate areas with the involved resource agencies.
3. Consultations will be initiated by the Licensee with the U.S. Forest Service on the project boundary issue, particularly concerning riparian areas at Spada Lake.
4. Consultations will be initiated by the Licensee with the other involved resource agencies about plan development.
5. The Licensee will obtain consultant services to assist in plan development.
6. The Licensee expects to obtain documentation from the involved agencies commenting on the progress and adequacy of the terrestrial mitigative plan for submittal to the Commission.

Based upon the results of these events, the Licensee expects to be able to present a filing to the Commission that will identify remaining elements of the terrestrial resource mitigative plan and a time schedule for completing tasks which will enable the agencies to determine if the Licensee has fulfilled its terrestrial resource mitigation requirements.

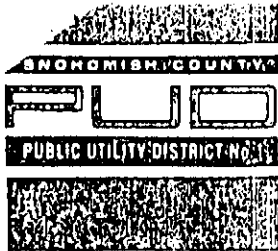
Very Truly Yours,

Original Signed By James Moran / 930

J. D. Maner
Executive Director
Utility Operations

RGM:jk

cc: Engman, Wash. Dept. of Game
Ging, U.S. F & W.S.
Somers, Tulalip Tribes
Bartelme, U.S. Forest Service



ATTACHMENT I to District letter of 8/24/85

2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

July 23, 1985
PUD-16450

Mr. James W. Bartelme
District Ranger
U.S. Forest Service
Mt. Baker - Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Dear Mr. Bartelme:

Jackson (Sultan) Project
Project Boundary - Lands of the U.S.A.

Recently, the District made a submittal to the Federal Energy Regulatory Commission (FERC) in accordance with Project License Article 5B which addresses lands of the United States enclosed within the project boundary. Copies of pertinent parts of Exhibits A (Description of the Project) and G (Detail Maps showing the Project area) are enclosed.

The project licensees advised the FERC that the Spada Lake facilities project boundary indicated in the submittal, elevation contour 1,460 feet, "is the minimum acceptable to the co-licensees". The preferred boundary would be at least the standard 200-foot (horizontal measurement) withdrawal allowed exterior of the reservoir shoreline as defined by normal maximum water surface elevation (18 CFR § 4.41(f)). In this case that would be 200-feet horizontally from elevation 1,450 feet. However, the present survey is only for elevation 1,460 feet and recognizing that other germane issues were still pending resolution (e.g., Exhibit R - Recreation Plan, Exhibit S - Terrestrial Wildlife Mitigation Plan, and Forest Service Special Use Permit) the licensees advised the FERC that the project boundary was preliminary only.

In addition to the reasons just stated, the District is aware of two other issues of equal or greater significance which bear directly on determining the "final" project boundary. Both of these issues involve the U.S. Forest Service. The first is mentioned briefly in Exhibit A, and that is the Esccondido case court decision. Development of implementing policies and guidelines are, we understand, under discussion between the Forest Service and FERC.

The second issue is perhaps the most controlling and influences all of the other issues: the position of the Forest Service with respect to the lands of the United States which it administers in the Sultan River basin.

Mr. James W. Bartelme
U.S. Forest Service

-2-

July 23, 1985
PUD-16450

especially those lands affected by the Jackson Project either through power withdrawal status or encompassed within a proposed project boundary. In order for project licensees to proceed in an orderly fashion while developing recreation and wildlife mitigation plans as well as determining a proposed final project boundary encompassing lands of the United States, it is essential that we have a clear, definitive statement from the Forest Service about current intentions concerning the lands it administers in the Sultan River basin. Therefore, we request from you at your earliest convenience, a written policy/position statement from the Forest Service regarding Mt. Baker - Snoqualmie National Forest lands affected by the Jackson Project. Additionally, we request that the Forest Service identify the procedure or steps (and any options) in a process which it believes could be undertaken by the licensees so as to be consistent with the position statement provided in response to our request.

In making these requests, the District acknowledges the previous statements (both written and oral) on this issue by the Forest Service. However, positions sometimes change with time. Accordingly, it is essential that the licensees have for their consideration a current affirmation from the Forest Service on its position regarding the Federal lands affected by the Jackson Project.

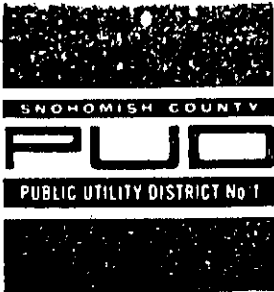
Very Truly Yours,

Original Signed By
L. C. GRIMES

for RKS
Robert K. Schneider
Power Manager

Enclosure
RGM:jk

1-3



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

August 27, 1985
PUD-16520

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. James W. Bartelme
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
License Article 53 - Terrestrial Wildlife Mitigative Plan
Consultation Meeting Notice

E-4 This is to follow-up on recent telephone conversations with you on the subject and also to initiate activity in accord with our recent submittal to the Federal Energy Regulatory Commission on Article 53. We have set aside September 10, 11 and 12, 1985, for field trips to proposed mitigative areas in the Sultan River Basin. A proposed agenda and itinerary is attached. The first day's meeting is scheduled to start at 10:00 a.m. at the powerhouse, located about three miles north of the Town of Sultan and reached via the Sultan Basin Road, 116th Street, and the District's access road.

Since some time has passed when the previously proposed plan was submitted to you and the FERC, a review outline (copy attached) has been prepared presenting key points from the revised Exhibit S as submitted to the FERC. The key points are highlighted to reduce review time.

An outline has been prepared for the pending resumption of planning work for developing the terrestrial mitigative plan required by FERC Order. It is labeled "conceptual" pending review and consultation with the resource agencies. A copy is attached also.

A suggestion was made by Gwill Ging to obtain aerial photography coverage of the involved areas. At this writing that is being pursued. If available and obtained in time, they will be prepared and attached to this letter. Otherwise such photos will be provided later when/if available, preferably in time for the field trips.

140U

Mr. Engman, Mr. Ging,
Mr. Somers, Mr. Bartelme

-2-

August 27, 1985
PUD-16520

For the aerial reconnaissance, the helicopter has seating for four passengers plus pilot. The itinerary schedule, as proposed, is based on the assumption of one flight with all key participants aboard (1-PUD, 1-WOG, 1-USFWS, 1-Tribe). If you plan more than one person in your party, please advise us concerning the desirability of their having an aerial tour also so that sufficient flight time is scheduled with Pacific Helicopters. Roy Metzgar should be contacted by telephone (347-4319) with any response, due to time constraints.

We appreciate your commitment of time and cooperation to assist the District in resuming the development of a terrestrial mitigative plan.

Yours Very Truly,

Original Signed By
L. C. GRIMES
L. C. Grimes
Chief, Generating Resources

Attachments
RGM:jk

140U

ATTACHMENT to District Letter
of 8/27/85

Henry M. Jackson Hydroelectric Project
License Article 53 - Terrestrial Mitigative Plan
Proposed Agenda and Itinerary
September 10, 11 and 12, 1985

page 1 of 2

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
JACKSON PROJECT - FERC #2157
TERRESTRIAL RESOURCE MITIGATION
BACKGROUND REVIEW OUTLINE

page 2 of 2

September 10 (Tuesday)

10:00 a.m. - Convene at powerhouse
10:00-10:15 a.m. - Review background issues
10:15-10:45 a.m. - Review proposed mitigation areas and aerial
reconnaissance flight
11:00 a.m.-12:30 p.m. - Aerial overview of sites (by helicopter)* -
depart from powerhouse landing pad
12:30 p.m. - Lunch at powerhouse
1:30 p.m. - Field trips to selected sites (for first
day - suggest powerhouse area, Cascade
Creek watershed, Jap Lake and Marsh Creek
power pipeline crossing)
4:30 p.m. - Return to powerhouse

September 11 (Wednesday)

9:00 a.m. - Convene at powerhouse. Aerial
reconnaissance flight (back-up date - also
additional flight, if needed).
Resume field trips (for second day -
suggest Williamson Creek old growth timber
and sample Spada Lake riparian and
perimeter areas)
Lunch break in
field as appropriate Lunch
4:00 p.m. Depart upper Sultan Basin

September 12 (Thursday)

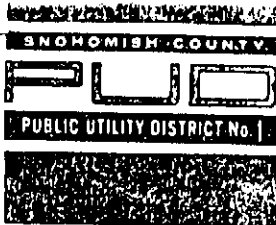
9:00 a.m. Convene at Family Restaurant parking lot.
Aerial reconnaissance flight (back-up date
- also additional flight, if needed).
Resume field trips (for third day - suggest
Lake Chaplain watershed and Lost Lake tract)
Lunch break in
field as appropriate Lunch
4:30 p.m. Return to Family Restaurant

- I. Pre-Development - (Attachment I)
- II. Old Growth Timber Issue - (Attachment I)
- III. Mitigation Habitat Preference (Agencies) - (Attachment II)
- IV. Mitigation Element Preference (Agencies) - (Attachment III)
- V. Initial Mitigation Proposal (District) - (Attachment IV)
- VI. Agency Response - (Attachment V)
- VII. Consultation Results - (Attachment VI)
- VIII. Mitigation Proposal Submitted to FERC (VII)
- IX. FERC Order on Exhibit S (VIII)
- X. District Article 53 Submittal to FERC
- XI. Next Proposal Elements - Concept Outline

RGH: 8/23/85

*If weather conditions are unfavorable, re-schedule flight to subsequent day.

140U



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

October 16, 1985
PUD-16589

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

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Mr. James W. Bartelme
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
License Article 53 - Terrestrial Wildlife Mitigative Plan

E-7
The purpose of this communication is to summarize recent activities undertaken by the District (and results) in cooperation with you on terrestrial wildlife mitigative planning. Also, the District soon must submit a report to the Federal Energy Regulatory Commission in accordance with our August 21, 1985 submittal to the FERC on Project License Order Amendment Article 53. Therefore, the District requests comment from your agency as to the 'adequacy of the plan' thus far.

Before summarizing recent activities, a brief review of the pertinent FERC Order (20 FERC ¶ 62,249 - Issued August 22, 1984) may provide useful guidance to you in preparing your response. The basic requirement in that Order is to provide "a revised terrestrial resources mitigative plan to protect and enhance terrestrial resources in the Sultan Project area. The

1980

-1-

Mr. Gary Engman, Mr. Gwill Ging
Mr. David Somers, Mr. James Bartelme

October 16, 1985
PUD-16589

plan shall include, but not be limited to: (1) identification of the type of habitat to be used for replacement; (2) a determination of the location and number of acres of habitat to be used for replacement; (3) a schedule of implementation; and (4) a monitoring program to determine the effectiveness of the mitigative measures. Documentation of agency consultation on the mitigative plan, and agency comments on the adequacy of the plan, shall be included in the filing.* Simply, this letter plus your response will document the recent and ongoing consultation process, the results so far and your present assessment concerning 'adequacy of the plan'.

The 'plan' at this stage is the document entitled, Terrestrial Resources Mitigative Plan for FERC Order of August 22, 1984: Conceptual Outline. The District proposes to submit that document to the FERC (as sent to you on August 27, 1984) as the initial or fundamental basis for the required revised plan. Another important section - VIII-AGENCY CONSULTATION will be added, however, before submittal to the FERC. This letter (and your response to it) will be included in new Section VIII. Essentially, what we submit to the FERC on October 21 will constitute a progress report. Since the 60-day extension deadline is October 21, 1985, you should submit your written response as soon as possible directly to the Commission (with a copy to the District).

1980

-2-

The District outlined six events that were to be undertaken during the initial 60-day extension requested in our August 21, 1985, submittal. This is what has happened since then.

1. The Licensee will draft a concept plan proposal for a revised terrestrial resource mitigative plan. This proposal will be submitted to the resource agencies for their review and comment.

The concept plan has been sent to you and discussed above. Two other new sections will be added besides VIII - AGENCY CONSULTATION to fulfill the FERC Order. They are: VI - MONITORING PROGRAM and VII - SCHEDULE OF IMPLEMENTATION. Section VI will be developed in consultation with the resource agencies. It will be blank in the pending submittal. Section VII will reflect discussion after the October 4 aerial reconnaissance with you about the likely planning schedule.

2. The Licensee will conduct field trips to candidate areas with the involved resource agencies.

Field trips were conducted by vehicle on September 10 and 11 with representatives from the Washington Department of Game and U.S. Fish and Wildlife Service. A helicopter aerial reconnaissance was conducted on October 4 with the Washington Department of Game, Tulalip Tribes and U.S. Fish and Wildlife Service representatives.

3. Consultations will be initiated by the Licensee with the U.S. Forest Service on the project boundary issue, particularly concerning riparian areas at Spada Lake.

A USFS representative attended the meeting held on September 10 to discuss renewal of the terrestrial mitigative planning process. The subject was discussed also at a project administrative coordination meeting held earlier on that date. Another meeting is scheduled for October 17 with the District and Forest Service pursuant to the project boundary, land exchange and riparian areas at Spada Lake issues. Also, the District has received a written reply from the Forest Service on the subject (copy attached).

4. Consultations will be initiated by the Licensee with the other involved resource agencies about plan development.

This was started on October 4 with the Local Area Manager, Washington Department of Natural Resources. At an impromptu field meeting coincident with the helicopter flight, items of interest were discussed. A meeting was held on October 14 between the District and the DNR pursuant to plan development and implementation.

Mr. Gary Engman, Mr. Gwill Ging
Mr. David Somers, Mr. James Bartelme

October 16, 1985
PUD-16589

The most important topics were the Williamson Creek area old growth timber stand and the results of consultations with you during recent field trips. The discussion results will be reflected in the pending submittal to the FERC. The District's understanding of and response to the agencies' comments about shifting the boundaries of the old growth timber area as provided earlier will be acknowledged to the FERC. Also, future public accessibility to a private tract was discussed. The DNR is building a logging road into the adjoining tract owned by the State. This will be a permanent road and open to the public.

5. The Licensee will obtain consultant services to assist in plan development.

The District has published a public notice requesting statements of qualification from consulting environmental firms. Fifteen were received in response. A list of them was given to you during the October 4 post-flight meeting. The SOQ's are now being evaluated. The "short-list" of finalists will be submitted to the resource agencies for your comment, if any. The selection process may include interviews and a request for submittal of technical proposals on the scope of work. It will probably be mid- to late-November before a contract is negotiated and signed with a consultant to provide the services necessary to begin further plan development.

Mr. Gary Engman, Mr. Gwill Ging
Mr. David Somers, Mr. James Bartelme

October 16, 1985
PUD-16589

6. The Licensee expects to obtain documentation from the involved agencies commenting on the progress and adequacy of the terrestrial mitigative plan for submittal to the Commission.

Pending: That is the principal reason for this communication.

Besides that which has been accomplished already or pending and discussed above, other important steps are pending. Briefings for the Districts' publicly-elected Board of Commissioners are set for October 22 (Executive Session) and 29 (Public Meeting) on plan development and implementation. Prior to staff recommendations to that Board for expenditure of substantial amounts of money for the plan, it is essential to have written statements from your agencies. (For clarification, these statements are the same as for the FERC - only one statement not two.)

Finally, as a further aid to you in preparing your comments, we have enclosed a copy of the pending submittal letter to the FERC. It is a draft and can be revised, as necessary, to reflect your pending comments. To do so however, will require telephoning Roy Metzgar (347-4319) by no later than noon on October 21 with any revisions.

During recent field trips and consultations about proposed mitigation sites, concern was expressed about accessibility to the public. Some sites are municipal watersheds and some are relatively inaccessible and in private ownership. Both watershed sites have been "open" to the public in limited

E-9

Mr. Gary Engman, Mr. Gwill Ging
Mr. David Somers, Mr. James Bartelme

October 16, 1985
PUD-16589

fashion for years. Roads open to the public provide access (see map attached). The definite, permanently closed areas are in the immediate vicinity of the reservoirs.

Concerning the two private sites, one is proposed as a possible acquisition by the District. That 220-acre site is surrounded on the south and west by State land managed by the DNR. Future public access possibilities to the site across State land via logging roads would appear to be excellent. The other smaller site (40 acres) will probably remain in private ownership. Since these sites involve real estate property matters with private ownership, premature public disclosure could jeopardize proposed concepts. Therefore, please handle confidentially any specific identification of those sites.

We are hopeful that you are satisfied with the results of recent activities. We realize that much remains to be done. It will be time-consuming and require substantial participation on your part. We appreciate your patience and cooperative assistance.

Very truly yours,

Original Signed By
R. K. SCHNEIDER
R. K. Schneider
Power Manager

Attachments
RGM:jk

E-10



1000
 OCT 21 1985
 FISH AND WILDLIFE SERVICE

United States Department of the Interior

Ecological Services
 2625 Parkmont Lane S.W., Bldg. R-3
 Olympia, Washington 98502

October 17, 1985

Mr. J. D. Maner, Executive Director
 Snohomish County PUD No. 1
 P.O. Box 1107
 Everett, Washington 98206

Re: Sultan River Terrestrial Resources Mitigation Plan; Jackson
 Project, FERC 2157

Dear Mr. Maner:

We have reviewed the District's proposed approach to mitigate terrestrial wildlife impacts, as described in the "Terrestrial Resources Mitigative Plan for FERC Order of August 22, 1984 - Conceptual Outline". We have also discussed the District's proposal and visited potential mitigation sites with Mr. Roy Metzgar of your staff.

We appreciate the groundwork and effort expended by Mr. Metzgar in identifying potential mitigation lands, as well as several related issues that could affect mitigation opportunities. As we understand your approach, the areas that have been identified by Mr. Metzgar will be inventoried by the District's consultant in terms of species and habitat types. Following this task, potential enhancement options will be developed for agency review and comment. Based on this understanding, your conceptual approach is acceptable to the Service.

To assist you in your mitigation efforts, there are several issues and comments that we would like to identify and present at this time. Public access should be considered a key element in your mitigation plan. Lands which would be closed to the public are unacceptable mitigation sites, unless there are unusual over-riding considerations.

Of the mitigation sites visited during two recent field trips, and based on the information received to date, we have a strong preference for including the Williamson Creek Option 1 Tract and the 220-acre private parcel as components of your mitigation plan. Our specific mention of these tracts is prompted by our concern that logging or change of ownership could preclude mitigation efforts at these sites. With respect to the

Williamson Creek Option 1 Tract, we would like to see the boundaries of this area modified to include additional acreage above the flood plain toward its southern end (including acreage from the Williamson Creek Option 2 Tract and portions of an unnamed tract along the east boundary) and to exclude portions at its northern extreme where old growth timber has already been harvested. We understand that the harvesting of timber on the Option 2 Tract may result in significant disturbance to the Option 1 Tract from yarding operations. Consequently, we recommend that the District consider the acquisition of additional portions of the Williamson Creek Option 2 Tract to eliminate the need for log yarding access on the Option 1 Tract.

We would also like the District to evaluate the feasibility of wetland development along some of the flatter areas and depressions that occur to the north of Spada Lake.

We noted during our field trips to the project area that a considerable percentage of the deciduous trees between reservoir elevations 1440' and 1450' have survived while most of the coniferous trees have died. We recommend that a significant percentage of the dead trees be retained, as they serve a variety of biological functions. However, we recognize that the removal of dead trees near access points may be necessary to reduce the risks of fire.

We do not have any specific comments to offer at this time on the remaining sites that have been identified. When the species and habitat inventories are completed and the mitigation proposals are presented, we will comment on the suitability of the mitigation sites.

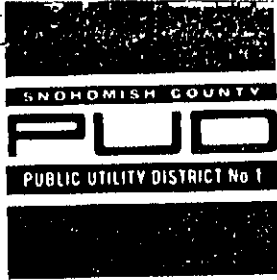
Thank you for the opportunity to review your conceptual plan. We look forward to working with you in developing an acceptable terrestrial resource mitigation plan.

Sincerely,

Lynn P. Childers
 for Charles A. Dunn
 Field Supervisor

cc: WDG, Engman
 Tulalip Tribes, Somers
 FERC, Plumb
 FERC, Leach (S.F.)
 USFS, Bartelme

11



10-3-4-3

2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P O Box 1107, Everett, Washington 98206

October 21, 1985
PUD-16590

Kenneth F. Plumb, Secretary
Federal Energy Regulatory Commission
825 North Capitol St. N.E.
Washington, D.C. 20426

Dear Mr. Plumb:

Henry M. Jackson (Sultan River) Project No. 2157
License Article 53 - Terrestrial Resources Mitigative Plan

On August 21, 1985, the Licensee filed a request for a 60-day extension on the Commission Order requiring a revised Terrestrial Resources Mitigative Plan (28 FERC ¶ 62,249 issued on August 22, 1984). In the filing, six items were listed to be accomplished during the time extension. All of them are either completed or work is in progress toward completion. The status of each is summarized in a recent letter to the resource agencies (PUD-16589) which is included in Section VIII - AGENCY CONSULTATION in the enclosed plan document.

In accordance with the Commission's Order, a revised plan document has been prepared. The Terrestrial Resources Mitigative Plan for FERC Order of August 22, 1984 - Conceptual Outline is based partially on the content of the revised Exhibit S submitted previously to the Commission. The revised document presents concepts proposed by the Licensee to satisfy the concerns of the natural resource agencies expressed previously in their letters to the Commission about Exhibit S (Revised). The Licensee does not claim that the document enclosed with this submittal either complies fully with the intent of Article 53 or the subsequent Commission Order on Exhibit S (Revised) to which we are herein again responding. Due to the dynamics of several interrelated (but as yet unresolved) issues discussed in our prior submittal, such as project boundary determination with the U.S. Forest Service, plan development must proceed cautiously and incrementally. As events unfold and planning work produces results, the reality of what can be achieved with proposed sites will be determined. That information is essential in responding to major points of concern raised previously by the resource agencies about Exhibit S (Revised). Being mindful of those concerns, the Licensee has initiated close and frequent consultations with those agencies, and we are committed to maintain such in the ongoing mitigative planning process.

The planning procedure that the Licensee is embarked upon is described in Section V of the enclosed document. When considering the acreage that is involved initially (at least 3,000 acres), the time that will be

Kenneth F. Plumb, Secretary
FERC

-2-

October 21, 1985
PUD-16590

required to complete essential field work, allowing for essential coordination and consultation with the resource agencies, and obtaining land owner agreements, substantial additional time will be required. These matters have been discussed with the resource agencies and they concur with that assessment and conclusion about the need for additional time to develop the mitigative plan. Accordingly, the Licensee requests a time extension of 10 months to complete the ongoing work.

During the ensuing extension period, the Licensee proposes to submit 90-day progress reports to the natural resource agencies and Commission. These reports will present the status of plan development activities to all parties. Specifically, the Licensee proposes an incremental approach with each proposed mitigation site rather than a simultaneous comprehensive strategy. Thus, the final mitigative plan will be a compendium of separate plans completed serially on a site-by-site basis. No representation has been made by any party to the other that the sites and concepts proposed in the enclosed planning document will provide mutually agreeable settlement for mitigation and enhancement obligation for the project. However, the resource agencies concur with the Licensee that this planning strategy seems reasonable based upon their guidance, provided previously about mitigation habitat sites and types, potential mitigative opportunities in the Sultan River basin, and the complexity of the situation.

Due to the tight working schedule, not all of the resource agencies' comments regarding the Licensees' proposal are included in the consultation section of the enclosure. Missing comments either will be sent directly to the Commission by the agencies or forwarded to the Commission upon their receipt by the Licensee, if sent to us. At this time, the Licensee is proceeding expeditiously with plan development as outlined above and in the enclosed planning document.

Very truly yours,

Original Signed by James Maner

J. D. Maner
Executive Director
Utility Operations

Attachment (15 copies)
RGH:jk
cc: Mr. Engman
Mr. Ging
Mr. Somers
Mr. Bartelme

E-12

ATTACHMENT to
District letter of 10/21/85
page 1 of 2

page 2 of 2

HENRY M. JACKSON (SULTAN RIVER) HYDROELECTRIC PROJECT

FERC PROJECT NO. 2157

LICENSE ARTICLE 53

REVISED TERRESTRIAL RESOURCES MITIGATIVE PLAN

FOR FERC ORDER OF AUGUST 22, 1984

CONCEPTUAL OUTLINE

PUBLIC UTILITY DISTRICT NO. 1
SNOHOMISH COUNTY, WASHINGTON
AND CITY OF EVERETT

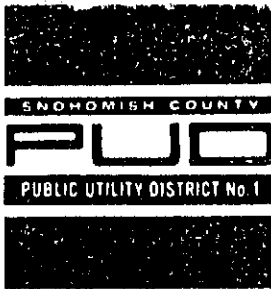
AUGUST, 1985

REVISED OCTOBER, 1985

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	HISTORICAL SUMMARY OF HABITAT CONDITIONS	3
III.	PROJECT IMPACT ON TERRESTRIAL WILDLIFE	6
IV.	PLAN COMPONENTS	8
	A. Preservation Element	
	B. Land Management Element	
	C. Completed Elements	
V.	SPECIFICATION PROCEDURE	17
	A. Agency Concerns	
	B. Plan Development	
VI.	MONITORING PROGRAM	22
VII.	SCHEDULE OF IMPLEMENTATION	22
VIII.	AGENCY CONSULTATION	23
	REFERENCES	24
	APPENDIX - CONSULTATION DOCUMENTATION	25

E-13



PND 16-3-4-3

2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

October 24, 1985
PUD-16600

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. Gwill Ging
U. S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. James W. Bartelme
District Ranger
U. S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
License Article 53 - Terrestrial Wildlife Mitigative Plan
Consultant Services Selection - Short List

E-14

The District has determined the finalists in the process to obtain consulting services for the pending mitigative plan as presented in the Conceptual Outline. The short list and interview schedule is attached. The finalists were selected from among fifteen firms who responded to the District's public notice (copy of list attached). The finalists' statement of qualifications (shortened) are attached also.

The interviews on November 4th will focus on possible consultant study team organization scenarios and clarification/identification of key personnel and their role in the effort. The scope of work will also be discussed. Consultant selection will occur soon after the interviews.

If you have any comments about firms on the short list or intend to attend the interviews, please contact the Project Leader, Roy Metzgar, at 347-4319 immediately.

Very truly yours,

Original Signed By
L. C. GRIMES
L. Chet Grimes
Chief, Generating Resources

Attachments
RGM:jk



United States
Department of
Agriculture

Forest
Service

Mt. Baker-Snoqualmie
National Forest

Skykomish Ranger District
Skykomish, WA 98288

PND 16-3-4-3

76602

Map No. 2770

October 25, 1985

R.K. Schneider, Power Manager
Snohomish County PUD No. 1
P.O. Box 1107
Everett, WA 98206

Re: Your October 16 letter, PUD-16589

Dear Mr. Schneider:

Please find enclosed a copy of our 9/27/85 letter to Mr. Grimes. Our comments in this letter should respond to your October 16 letter requesting comments on Article 53.

Sincerely,

James W. Bartelme
JAMES W. BARTELME
District Ranger

Enclosure

SEARCHED	SERIALIZED	INDEXED	FILED	OCT 28 1985	SKYKOMISH	WA



United States Forest Service Skykomish Ranger District
Department of Agriculture P.O. Box 305
Skykomish Ranger District 98288

Reply to: 2770

Date: 9/27/85

L.C. Grimes, Chief, Generating Resources
Snohomish County PUD No. 1
P.O. Box 1107
Everett, Washington 98206

Re: License Article 53, Your August 27, 1985 Letter

Dear Mr. Grimes:

Recently, I met with Roy Metzgar, Snohomish County PUD; Gary Engman, Washington Department of Game; Dave Somers, Tulalip Tribes; and, Gwill Gling, U.S. Fish and Wildlife Service to discuss a "conceptual" Exhibit S. Since we had only a short period of time to review your proposal, we were unable to provide many comments. This letter is an informal, staff response to your "conceptual" Exhibit. As in the past, our formal response will occur when FERC issues an amended exhibit for agency comments.

Overall, we concur with the general approach you are taking to acquire land for mitigation. The scope of that effort needs more detail and analysis to determine its effectiveness in mitigation. Due to our cooperative agreements with the Department of Game, we can accept "offsite mitigation" (off NF land) provided the animals using adjacent NF lands are benefited. This approach will obviously benefit large, migrating game animals.


A potential problem we see is the mitigation for non-game, and small game animals which do not migrate. This will need to be considered.

The proposal does not address habitat needs for animals using the lake surface (waterfowl, beaver, muskrat, etc.). We have continuously commented on this need.

I have evaluated the options for special use permit/project boundary and will recommend the boundary be the 1460 foot elevation line around Spada Lake. You should receive a special use permit and response in the near future.

We are not convinced the lakeshore is "riparian" habitat. This is based upon our evaluation of the current situation. We find that the 10 foot (1440-1450') zone has pretty much died. In some areas, alder and cottonwood have managed to survive in a distressed condition. We found that essentially no ground vegetation has survived. We expect continued dying of the vegetation in this area. This can be further defined as we develop the clearing plan to remove much of the dead/dying material. As we discussed, we would like to see a snag management retention zone using the Forest Service riparian guidelines.

Sincerely,


JAMES W. BARTELME
District Ranger

cc: Roy Metzgar
Sam Nagel
Gary Engman
Dave Somers
Gwill Gling



Commission News

WILDLIFE MITIGATION PROGRAM DISCUSSED FOR JACKSON PROJECT

Jackson Project Coordinator Roy Metzgar presented a briefing for the Commission Tuesday on the project's wildlife mitigation plans. The presentation was to prepare the Commission for decisions that will need to be made at future meetings. Although the Project received Washington State's 1984 Environmental Excellence Award, there are still additional mitigation requirements to be fulfilled.

The Commission will need to consider such things as consulting services contracts to develop and implement a wildlife mitigation plan and consideration of land acquisitions or long-term property leases. The land would be required to provide habitat areas for wildlife to replace the land that was flooded by the raising of the Spada Lake Reservoir in 1984. The land transactions are required by the District's Federal Energy Regulatory Commission's Project License for the Jackson Project, Metzgar said.

The District has already received fifteen statements of qualification from environmental consulting firms, in response to the District's advertising.

October 30, 1985

E-16

THE HERALD Tuesday, November 5, 1985

Local/Region

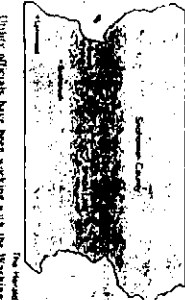
OPINION
NORTHWEST BRIEFLY
WEATHER
B

5C

PUD plans wildlife-habitat area near Spada Lake

A Amendment to meet with advertising for news and information, Page 36

By MARK FUNK



SILVAN — Along the banks of Williams Creek, in the shadow of the Cascade Mountains near Spada Lake, stands majestic Douglas firs and towering hemlocks that were sown from the Olympic rainforest seed pit archives. Underneath the rich canopy of these conifers resides a woodland environment that supports a variety of rare and unusual life.

Other groups have been working with the Washington State Department of Game, the U.S. Fish and Wildlife Service, the Tilling Tiers of Washington and the U.S. Forest Service to come up with an acceptable plan. Within the next month, the district's commissioners are expected to approve the hiring of a consultant who will be charged with preparing a wildlife mitigation plan for the acreage that has been identified as suitable for inclusion in a habitat. Other lands are managed by such districts.

Some degree probably will continue there, though it is expected that the timber harvest will be reduced in the future. Timber companies won't be allowed to clear-cut, but the woods may be thinned, a practice which can improve conditions for some species of animals, he said. Also under consideration are actions in the habitat which would improve the habitat's ability to support a variety of wildlife. That had now has a second growth of trees that has reached maturity.

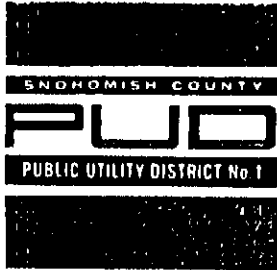
Other organizations as the state Department of Natural Resources, Snohomish County, the Town of Sultan and timber companies. Nonetheless, says the PUD's Schneider, "We hope to have an opinion on the land by the end of the year." Most of the 2,000 acres under consideration is land that timber companies logged around the 1980s, cutting the trees to the ground, and leaving them open to the elements. The district's plan is to replant the area with a second growth of trees that has reached maturity.

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2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

January 15, 1986
PUD 16693

Mr. Gary Engman
Washington State Department of Game
16018 Mill Creek Blvd.
Bothell, WA. 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane-S.W.
Olympia, WA 98502

Mr. James Bartelme
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie
National Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

RE: Jackson Project - FERC #2157

E-17 We have developed working outlines for 1) the Terrestrial Wildlife Mitigation Plan and 2) the process for developing the Terrestrial Wildlife Mitigation Plan.

Enclosed are copies of these outlines for your review. We would like to discuss the contents of the outlines with you immediately following the fisheries meeting scheduled for January 29, 1986.

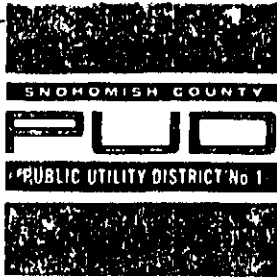
If you have any questions or comments on the outlines or will not be attending the meeting on the 29th and would like to discuss the outlines over the phone, please call me at (206) 347-4374.

Sincerely,

Karen Bedrossian

Karen Bedrossian
Wildlife Biologist

Enclosure



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

February 12, 1986
PUU 16732

Mr. Gary Engman
Washington State Department of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. James Bartelme
U.S. Forest Service
Mt. Baker-Snoqualmie
National Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
Wildlife Mitigation Plan - Meeting Records

Considering the numerous tasks before us and the length of time required to complete those tasks in terrestrial wildlife mitigation plan development, it is mutually beneficial to record the content and results of meetings and important telephone conversations. Accordingly, the District will attempt to prepare accurate summaries and send them to you. If your notes or recollections differ from our written records, please so indicate to us. Any revisions or additions should be specifically mentioned by any party at the next meeting and clarified. This action should be reported in the record for that meeting (or telephone conversation). With the level of effort and commitments inherent in the pending plan development process, this recording is essential. Also, this record-keeping system provides a record to other interested participants who might not have been able to attend a particular meeting.

Accordingly, the District transmits minutes of the January 29th meeting on plan development scope of work. Subsequent to that meeting, the District staff have had telephone conversations or personal contact with Messrs. Ging, Engman, Bartelme, and Somers about the first draft of the scope of work for plan development. From these contacts, the District is proceeding with continuing to refine and revise the scope based on general acceptability to those individuals. This matter is an extremely important point to the

354U

Joint Agencies

-2-

February 12, 1986

District. Prior to presenting a proposed contract to the District's Board of Commissioners for their approval, the District must have assurance or concurrence that the scope of work is acceptable to the resource agencies. Any comments you might have should be directed to Karen Bedrossian at (206) 347-4374.

Very truly yours,

L. C. Grimes
Chief, Generating Resources

Attachment

E-18

354U

Jackson Project - FERC #215/
License Article 53
Terrestrial Resources Mitigation Plan
Meeting Minutes

Terrestrial Resources Mitigation -2-
Plan
Meeting Minutes

February 29, 1986

Date: January 29, 1986
Place: NMFS, Sand Pt., Seattle
Attendees: G. Engman, Washington Department Game; G. Ging, U.S. Fish & Wildlife Service, K. Bedrossian and R. Metzgar; Snohomish County PUD
Purpose: Present outlines of plan development process and proposed scope of work; discuss certain technical issues related to HEP; and discuss reservoir (riparian) shoreline clearing plan.

The Mitigation Plan Outline and Mitigation Plan Development Outline (both dated January 15, 1986) were presented to the agencies, reviewed and discussed. Engman commented that the Plan Outline appeared comprehensive. The duration of the mitigation program was discussed. Engman and Ging will think about the time-period of the program. All agreed that it is an important issue which must be resolved for plan development.

The problems of using the same HEP (Habitat Evaluation Procedure) process for the Mitigation Plan that was used previously for assessing project impacts was discussed. Copies have not been found of the species models used in the HEP process and documentation of the assumptions made and reasons for HSI (Habitat Suitability Index) ratings when assessing the losses resulting from the Project. Attempting to use the same process for assessing the value of mitigation would not provide comparative results nor direct the mitigation planning in the most productive manner. It was agreed that 8 to 12 target species should be selected for mitigation rather than 48. Most of these species will be taken from the species list used in the original HEP evaluation of impacts. Species will be selected to represent each habitat type affected. The HSI ratings for these species from the original HEP evaluation of impacts will be used to calculate HU's lost for each of the 8 to 12 target species. These new HU (Habitat Units) values will be used as a baseline for evaluating the mitigation plan. It is understood that many assumptions will have to be made using this process, but it was agreed that this would be the best procedure to use in this case. The District will keep the agencies informed of and/or participating in assumptions development.

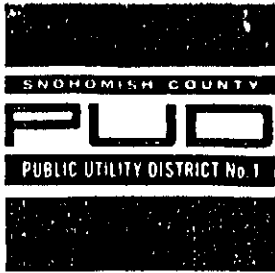
Selection of target species was discussed. Ging commented that he would like to see some target species selected that are limited to each specific habitat type. It was agreed that the agencies will be involved in the selection of target species.

The scope of work prepared by the consultants was distributed and discussed. It was noted that the scope assumed a mitigation plan completion date of December, 1986. Both agencies acknowledged the significance of their role in meeting this schedule. Both agency representatives said they would provide comments to the District on the scope of work by February 11, 1986.

The pending plan for reservoir shoreline clearing plan was discussed briefly. Discussion centered around the benefits of incorporating this plan into the overall mitigation plan. This issue will be discussed with the Forest Service.

cc: G. Engman, Washington Dept. of Game
G. Ging, U.S. Fish & Wildlife Service
J. Bartelme, U.S. Forest Service
D. Somers, Tulalip Tribes
K. Bedrossian
R. Metzgar

E-19



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

March 7, 1986
PUD 16748

Mr. Gary Engman
Washington State Department of Game
16018 Hill Creek Blvd.
Bothell, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. James Bartelme
U.S. Forest Service
Mt. Baker-Snoqualmie National
Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
Wildlife Mitigation Plan - Scoping

E-20

Enclosed is a copy of the revised scope of work prepared by the consultants. Please review the scope and provide your comments to Karen Bedrossian (206) 347-4374. If we do not hear from you by March 17, 1986, we will assume that the proposed scope is acceptable to you.

It is helpful to glance over the flow chart prior to reading the text and to refer to the chart as you are reading the text.

If you have any questions, please do not hesitate to call.

Very truly yours,

Original Signed By
L. C. GRIMES
L. C. Grimes
Chief, Generating Resources

Enclosure

383U

Scope Of Work

For Preparing A Terrestrial
Resource Mitigation Plan

For The

Henry M. Jackson Hydroelectric Project

Prepared For:

Snohomish County PUD
Everett, Washington

Prepared By:

Beak Consultants Incorporated
Bellevue and Portland

February 28, 1986
D3105N

Table of Contents

	<u>Page</u>
1. Scope of Work	1
1.1 Flow Diagram	
1.2 Scope (Point Form)	
A. Agency, Landowner PUD Tasks	3
W. Water Quality, Forestry Mapping Tasks	4
C. Core Process	11
H. HEP Activities	14
B. BEAK Activities	17
R. Reports/Products	19
PM. Project Management	21

1.0 Scope of Work

All tasks are BEAK tasks unless otherwise noted

A. Meetings

- A-1 Public Meeting: present goals (April 18)
~~BEAK, PFC and EES will attend. Each will give a 10 to 20 minute presentation. BEAK time includes preparation.~~ Notes will be sent to PUD for distribution.
- A-2 Agency and PUD meeting (see H-4) (May 19) approve HEP assumptions.
- A-3 HEP field trip (see H-9) (July 14-25).
- A-4 Public meeting (September 8).
Review progress of Mitigation Plan Meeting. ~~BEAK, EES, PFC will give a 10-20 minute presentation. BEAK time includes preparation.~~ Notes will be sent to PUD for distribution.
- A-5 PUD review first draft Mitigation Plan (October 22-31).
- A-6 Draft 2 Mitigation Plan will be submitted to agencies for review (November 19).
- A-7 Public meeting to review Draft 2 Mitigation Plan. BEAK, EES, PFC will give a 10-20 minute presentation. Notes will be sent to PUD for distribution.
- A-8 PUD review of plan (February 4-11).
- A-9 Agency landowner review (February 23-27).
- A-10, A-11 PUD and Agency Review (March 13-27).

E-22

W. Mapping, Water Quality and Forestry Activities

W-1 Identify constraints

-EES Tasks

W-1 Prepare water quality constraints document

- W-1.1 Review permits, landowner agreements operating guidelines, laws, regulations that have public health/water quality implications.
- W-1.2 Prepare document and outline general constraints and how they apply to the Mitigation Plan.
- W-1.3 Prepare necessary maps (rough sketches or prepared maps) to coordinate with base map effort.

W-2 Prepare base map, select management units

-EES Tasks

- W-2 Develop specific guidelines to be followed by forestry and wildlife team leaders during prototype timber cruise. Also show sensitive areas (e.g., poor soil) that may be included on the base map.

-PFC Tasks

W-2 Select management units

- W-2.1 Coordinate with BEAK personnel to develop criteria for management units (occurring as part of C-1).
- W-2.2 Review aerial photos and topographic maps.
- W-2.3 Delineate management units to be shown on base map.

-RASL Tasks

- W-2 Map preparation. RASL will prepare a Base Map and a cover type map at 1"-12,000". The map will be interpreted from 1983 natural color-aerial-low level-aerial photographs of the study area. Approximately 18 square miles will be mapped. This will include the study area as well as a buffer strip around the study area. The maps will be traced on mylar. These tracings will serve as rough maps for ground truthing, etc. Maps will be drafted by BEAK.

-BEAK Tasks

- W-2 BEAK will provide field trip information gathered by PFC and EES to RASL. BEAK will explain the need to prepare a prototype map for one management unit by April 15 and entire base map and cover type map by May 15.

W-3 Prototype timber cruise

- EES Tasks

W-3 Prototype cruise

- W-3.1 Participate in prototype cruise.
- W-3.2 Prepare public health/water quality input to prototype report.

-PFC Tasks

- W-3.1 Reconnaissance of area to determine appropriate sampling method, access, etc.
- W-3.2 Coordinate with BEAK and water quality personnel to develop inventory specifications (see B-2).
- W-3.3 Aerial photo interpretations: timber typing
 - develop field type maps.
- W-3.4 Planimetric acreage calculations.
- W-3.5 Design sample technique.
- W-3.6 Perform field data collection and revise inventory specifications as needed.
- W-3.7 Review and distribute resource information to various resource team personnel.
- W-3.8 Process data and summarize results.

-BEAK Tasks

W-3 Prototype cruise

BEAK will attend first day of cruise with EES and PFC. Notes will be taken and entered into the file.

W-4 Prototype timber type map

-PFC Tasks

- W-4.1 Review aerial photos.
- W-4.2 Review field notes from resource inventory.
- W-4.3 Revise initial timber types as necessary.
- W-4.4 Adjust acreage figures to reflect changes.
- W-4.5 Develop new map to reflect changes.
- W-4.6 Reconcile timber and cover type lines with BEAK personnel (see B-3).

W-5 Outline Preliminary Forest Management Plan

- PFC Tasks

W-5 Preliminary planning (meeting prep)

- W-5.1 Review processed data.
- W-5.2 Prioritize areas by need for management attention.
- W-5.3 Develop general management practice alternatives for each timber type.
- W-5.4 Meet with BEAK and water quality personnel to identify priorities and constraints of each timber type (see C-2).
- W-5.5 Evaluate practicality and economic impact of proposed management practice for each timber type.
- W-5.6 Refine management practices for prototype area.

W-6 Main timber cruise

- PFC Tasks

W-6 Forest resource inventory

- W-6.1 Reconnaissance to determine appropriate sampling method, access, etc.
- W-6.2 Aerial photo interpretation: timber typing
 - develop field maps.
- W-6.3 Planimetric acreage calculations.
- W-6.4 Design sample technique.
- W-6.5 Perform field data collection.
- W-6.6 Review and distribute resource information to various resource team personnel.
- W-6.7 Process data and summarize results.

W-7 Develop timber type map

- PFC Tasks

W-7 Timber type map

- W-7.1 Review aerial photos.
- W-7.2 Review field notes from resource inventory.
- W-7.3 Revise initial timber type lines as necessary.
- W-7.4 Adjust acreage figures to reflect changes.
- W-7.5 Develop new map to reflect changes.
- W-7.6 Reconcile timber and cover type lines with BEAK (see H-5).

E-23

W-8 Run growth model (without mitigation)

- PFC Tasks

W-8 Growth model

- W-8.1 Develop forest management plan over 100 years based solely upon timber production.
- W-8.2 Incorporate water quality constraints into plan.
- W-8.3 Process inventory results into growth database.
- W-8.4 Input forest management practices into program for each management unit.
- W-8.5 Grow database over 100 year period.
- W-8.6 Review and summarize results.
- W-8.7 Coordinate results with BEAK personnel (see H-9).

W-9 Develop Preliminary Forest Plan

-PFC Tasks

W-9 Preliminary plan

- W-9.1 Conduct field trips to adjacent landowners properties to review management techniques and stand response.
- W-9.2 Review current access routes.
- W-9.3 Review processed data.
- W-9.4 Develop silvicultural alternatives for each timber type.
- W-9.5 Coordinate management activities with water quality and wildlife biology personnel (see C-6).
 - incorporate water quality constraints and revise plan as necessary
 - evaluate wildlife and habitat management techniques and review economic and silvicultural impact
 - select appropriate forest management technique to incorporate wildlife management requirements
 - repeat cycle as client, agencies and resource team inputs develop
- W-9.6 Research forest products market within haul zone.
- W-9.7 Prescribe logging technique for each harvest area.
- W-9.8 Develop transportation system for management area.

- EES Tasks

- W-9 Prepare for meeting in Portland

W-10 Run computer growth model (with mitigation)

- PFC Tasks

W-10 Growth modeling

- W-10.1 Process inventory results into growth database.
- W-10.2 Incorporate refined management practices into program (from C-6).
- W-10.3 Grow database over 100 years.
- W-10.4 Review and summarize results.
- W-10.5 Coordinate results with BEAK personnel (see C-7, H-11).

- BEAK Tasks

- W-10 BEAK will meet with PFC before starting H-11 (HEP runs). BEAK will use PFC data for annualization (No cost here).

W-11 and W-12 Attend field check of Mitigation Plan and Review Plan

-EES Tasks

- W-11 Work with BEAK and PFC one day of field check for adequacy of plan
- W-12 Review Draft 1 Mitigation Plan and send notes to BEAK

- PFC Tasks

W-11 Field check plan

- W-11.1 Evaluate feasibility of management recommendations in field.
- W-11.2 Evaluate impact of wildlife management recommendations.

- W-12 Review Draft 1 Mitigation Plan and send notes to BEAK

W-13 and W-14 Costing effort

- PFC Tasks

- W-13 Provide input to Task B-12 where cost will be worked out for 100 years. Attend a meeting at BEAK in Portland.

E-24

W-14 Revenue calculations and appraisals

- W-14.1 Review inventory data.
- W-14.2 Research history of land use and management in the study area.
- W-14.3 Develop economic evaluation for each harvest activity.
- W-14.4 Develop economic evaluation for each management activity.
- W-14.5 Evaluate timber sales in adjacent ownerships.
 - timber quality: grade and product
 - logging costs
 - trucking costs
 - road construction costs
- W-14.6 Develop economic analyses for appraisal purposes.
- W-14.7 Coordinate information with BEAK for overall resource plan (see C-10).

- Syverson Tasks

- W-13 Attend meeting in Portland and provide cost estimates

W-15 Review Draft 1 Wildlife Management Plan

- PFC Tasks

W-15 Review plan

- W-15.1 Review document.
- W-15.2 Revise or recommend changes as necessary.
- W-15.3 Incorporate changes into forest plan and computer model as necessary.

- EES Tasks

W-15 Review plan

W-16 Revise computer growth model

- PFC Tasks

W-16 Modeling effort revenue/costs

- W-16.1 Process new (or revised) inputs into database.
- W-16.2 Incorporate changes in revenue/costs into database.
- W-16.3 Grow database over 100 year period.
- W-16.4 Review and summarize results.
- W-16.5 Coordinate results with BEAK personnel (see H-14).

W-17 Final review

- EES Tasks

W-17 Review final document

- PFC Tasks

W-17 Review final document

E-25

- C-6.2 Conduct forest lands meeting (5 days).
- evaluate each management unit for potential mitigation.
 - BEAK will present very preliminary mitigation from a wildlife perspective for management units 1 through 15.
 - very preliminary mitigation will be critiqued by PFC, EES and PUD, and from a recreation and land use perspective.
 - prepare a table of potential mitigation measures. Table will include the following for each management unit specific to site: Cover type, acres, mitigation technique/method, HEP value (gut guess), implementation cost, constraints and timber revenue potential.
- C-6.3 Produce a list of substantive constraints and permits that relate to forest practices.
- C-6.4 Conduct non-forest lands meeting (3 days)
- evaluate each management unit for potential mitigation.
 - BEAK will present very preliminary mitigation from a wildlife perspective for each management unit.
 - critique by PFC, EES, PUD, from a recreation and land use perspective.
 - add non-forest acres to the mitigation table (see C-6.2).
- C-6.5 Produce a list of substantive constraints and permits that relate to non-forest practices.
- EES Task
 - C-6 Attend meeting. Make sure public health and water quality concerns are being met.
 - PFC Task
 - C-6 Attend meeting (see W-9).
- C-7 Preliminary implementation schedule.
- C-7.1 Review all management plans for each of 15 units.
 - C-7.2 Produce a schedule for implementing mitigation methods.
 - C-7.3 Produce a schedule for O&M.
 - C-7.4 Produce a preliminary schedule for monitoring.
 - C-7.5 Produce a Gantt chart.
- C-8 Field fine tune (field trip 3).
- C-8.1 Conduct field trip to see how feasible "office mitigation plan" is likely to be. Check following constraints: forest practices, water quality, etc.
 - C-8.2 Check "gut guess" increases in HSI scores and document while in field.
 - C-8.3 Document reasons for increases based on literature.
- C-9 Fine tune field trip 4 with agencies.
- C-9.1 Determine increases in HSI scores for evaluation species for cover types in each management units.
 - C-9.2 Meet agencies to review adequacy mitigation plan.

C. Core Processes

- C-1 Reconnaissance.
- C-1.1 Conduct reconnaissance of facilities, priority habitats and mitigation properties listed in conceptual plan; check for data gaps, e.g., new cover types, field surveys of potential lands (Lost Lake tract), land use (public and private), forestry. Note data gaps in field notes and on a map.
 - C-1.2 Review project operation. For each facility site, recreate pre-project conditions. Propose management units.
 - EES Task
 - C-1 Attend reconnaissance. Discuss public health/water quality constraints. Show team Constraints Document.
 - PFC Task
 - C-1 Reconnaissance
 - C-1.1 Obtain and review maps and aerial photos.
 - C-1.2 Prioritize sites to visit.
 - C-1.3 Check general condition of timber, terrain, etc.
 - C-1.4 Review and organize field notes into report form (see R-1)
- C-2 Outline mitigation plan for prototype of management unit.
- C-2.1 Attend a one-day meeting in Portland. This meeting will be a prototype for the longer meeting (C-6) where water quality (EES), forestry (PFC), wildlife (BEAK), recreation (BEAK) and land use (All) will be integrated into a very preliminary mitigation plan. Time includes meeting preparation.
- C-3 Refine project and mitigation goals (See R-3 for hours).
- C-3.1 Based on public meeting prepare a statement of mitigation goals (e.g., priority habitat, in-kind, in-basin, identified agency concerns), list of mitigation lands and outline of mitigation approach (objective), etc. for presentation to wildlife agencies.
 - C-3.2 Review and refine statement of project goals (e.g., satisfy FERC requirements).
 - C-3.3 Prepare preliminary outline of final report (Management Plan). Update existing PUD outline.
- C-4 HEP goal setting.
- C-4.1 Based on agency meeting (A-~~7~~²) prepare HEP goals. See R-4 for time allocation.
- C-5 Evaluate mitigation lands.
- C-5.1 Conduct field trip 2 to assess HEP study of mitigation lands. Details of this step are outlined in HEP Activity Step H-9 (collect HEP data).
plan development
- C-6 Mitigation coordination (2 meetings in Portland).
- C-6.1 Determine goals and objectives for each management unit based on PUD goals, agency priorities, land use, ownership and constraints.

C-10 Fine tune costs/benefits.

- C-10.1 Develop cost for leasing or acquisition of preservation elements, i.e., old-growth.
- C-10.2 Develop cost for habitat management (i.e., cost of thinning/planting).
- C-10.3 Develop cost estimate for forage enhancement practices and non-forest management (i.e., wetlands).
- C-10.4 Develop estimate of timber revenues.
- C-10.5 Annualize costs over 100 years by management unit.

C-11 Final Wildlife Management Plan.

- C-11.1 Produce Final Report.

H. HEP Activities

H-1 Determine preliminary cover types.

- H-1.1 Identify cover types used in original HEP.
- H-1.2 Modify cover type list as necessary.
- H-1.3 Prepare species matrix by cover type include original 48 species as well as two reservoir species.
- H-1.4 Matrix will be used during the reconnaissance to assist in evaluation species selection.

H-2 Select HEP evaluation species.

- H-2.1 The HEP team (WDOG, USFWS, PUD, USFS, Tulalips BEAK) will select ten evaluation species from the matrix.

H-3 Outline HEP procedures for updating old HEP, prepare for HEP meeting.

- H-3.1 Review nuts and bolts of old HEP study. Prepare brief to be included in R-4.
- H-3.2 Based on HEP review, outline decisions that will have to be made by HEP team, for example:
 - define study area
 - convert old cover types to new cover types
 - list assumptions
 - establish target years
 - add recent land use changes
 - annualize
 - HEP computer run
- H-3.3 Outline HEP procedures for mitigation HEP. Outline decisions for HEP meeting, for example:
 - define study area
 - determine cover types
 - collect data in field
 - list assumptions
 - define target years
 - annualize
 - computer run
- H-3.4 Prepare agenda for HEP meeting, send to PUD.

H-4 HEP meeting.

- H-4.1 WDOG, USFWS, PUD, USFS, Tulalips, and BEAK will attend.
- H-4.2 Goals for the HEP will be discussed.
- H-4.3 HEP species selections will be finalized.
- H-4.4 Cover type selections will be finalized.
- H-4.5 Target years will be finalized.
- H-4.6 A schedule for future HEP steps will be outlined.

H-5 Write models.

- H-5.1 Review literature on evaluation species.
- H-5.2 Prepare one model per evaluation species including information on food, cover, water and reproduction requirements.
- H-5.3 Word models will be used during HEP data collection in the field. They will be submitted to PUD for review. BEAK will include PUD comments.

- H-6 Run HEP with and without project on project lands.
- H-6.1 Convert old cover types to new cover types.
 - H-6.2 Annualize with recent land use changes for with and without project.
 - H-6.3 List assumptions.
 - H-6.4 Determine target years.
 - H-6.5 Run HEP for with project and for without project.
- H-7 Develop cover type map for mitigation lands, planimeter map based on PFC.
- H-7.1 A cover type map will be developed by RASL (W-2) and given to PFC before timber cruise. Information from the timber cruise will be reconciled with cover type map.
 - H-7.2 The map will be planimetered to determine numbers of acres of each cover type. Planimetry will be conducted by PFC by timber type. BEAK will combined timber areas into cover type areas.
- H-8 Select evaluation points on mitigation lands.
- H-8.1 Define study area.
 - H-8.2 Assume 12 cover types.
 - H-8.3 Evaluation points will be selected randomly in each management unit using a block matrix method.
 - H-8.4 One point per cover type in each management unit (assume 5 points per management unit total).
 - H-8.5 HEP field trip, prepare data forms, etc.
- H-9 Collect HEP data by management unit (Field Trip 2).
- H-9.1 USFWS, WDOG, PUD, USFS, Tulalips and BEAK will comprise the HEP team.
 - H-9.2 The HEP team will visit each evaluation point and agree on an HSI score for each species.
- H-10 Run HEP(s) without mitigation on 15 management units.
- H-10.1 Perform annualization for wildlife habitat including land use and recreation to provide baseline for evaluation.
 - H-10.2 Coordination meeting with PFC to annualize timber cruise data for 100 years.
 - H-10.3 Prepare diagram showing assumed successional relationship between cover types. Relate successional information to target years.
 - H-10.4 Run a HEP for each management unit.
- H-11 Run HEP(s) with mitigation on management units.
- H-11.1 Estimate new HSI scores for species as a result of mitigation.
 - H-11.2 Develop tables (one per management unit) of new HSI scores by cover types and species.
 - H-11.3 Coordinate annualization (e.g., wildlife and land use) with mitigation measures for 100 years. Meet with PFC to discuss annualization.
 - H-11.4 Run a HEP for each management unit.
 - H-11.5 HEP output will indicate if mitigation is adequate.

- H-12 Suggest revisions for HEP(s), to balance HU's across species.
- H-12.1 Prepare to incorporate agency and PUD comments (A-4) into HEP(s).
 - H-12.2 Adjust mitigation design to balance HU's across species as needed.
 - H-12.3 Do not rerun HEP until agencies have input.

- H-13, H-14 Revise HEP(s)
Follow steps H-11.

B. BEAK ACTIVITIES

- B-1 Prepare for reconnaissance field trip.
B-1.1 Review literature on the project (e.g., HEP Study, Exhibit S, Conceptual Plan).
B-1.2 Obtain maps and photos showing the project area and mitigation lands.
B-1.3 Outline goals for the project (goals going in).
B-1.4 Plan the site visit.
B-1.5 Define the study area and draw boundaries on a map.
B-1.6 Review locations of recreation lands, facilities sites, elements and components. Identify these on a map.
B-1.7 Interface with RASL to start mapping process.
- B-2 Coordinate with Pacific Forest Consultants (PFC).
B-2.1 BEAK will outline wildlife data to be collected during timber cruise. BEAK will anticipate information likely to be required for HEP evaluation species. Lists of topics (e.g., snags, cottonwoods) will be prepared and forwarded to BEAK for a meeting with PFC.
PFC prior to BEAK.
- B-3 Prototype meeting preparation.
B-3.1 BEAK will review timber type map to check compatibility of cover types and ground truthing information with needs for HEP.
B-3.2 BEAK and PFC will select appropriate cover types.
B-3.3 BEAK will prepare example mitigation measures for prototype-mitigation-plan meeting. (C-2).
- B-4 Ground truth all non-forested cover types.
B-4.1 Obtain cover type map from RASL for whole project area. Go to each management unit to ground truth types of wetlands present. Provide input to step H-5 in form of a rough map with corrections.
- B-5 Conduct field sampling as requested by PUD.
- B-6 Literature review of mitigation (as needed to support recommended mitigation measures).
B-6.1 Review literature on habitat mitigation and enhancement techniques; identify potentials for gains, likelihood of success.
B-6.2 Photocopy important articles for PUD file.
- B-7 Develop preliminary plans for mitigation in each unit.
B-7.1 Produce a list of mitigation measures appropriate for cover types.
B-7.2 Consider water quality, recreation, land use and forest practise constraints.
- Provide*
B-8 Prepare recreation map input to wildlife Mitigation Plan.
B-8.1 Identify goals/objectives for recreational use of the area.
B-8.2 Select for consideration those recreational developments/uses compatible with water quality, wildlife, forestry and other constraints. *Provide recreation input to wildlife mitigation unit maps*
B-8.3 ~~Develop a recreation map with facility sites~~ and provide notes on type and season of use. Rely on map in Exhibit R.

- B-9 Prepare a preliminary mitigation map which will show resources being protected (e.g. snags, sensitive soils) and suggested implementation during years 1-5. Special resource data will be taken from timber cruise and wetland ground truth.
- B-10 Revise Draft 1 Preliminary Management Plan.
B-10.1 Incorporate PUD comments into draft (see R-8 for costs).
- B-11 Revise Draft 2 Preliminary Management Plan (follow 8-10 and R-8).
- B-12 Cost of implementation and maintenance.
B-12.1 BEAK will make costing assignments for PFC and Syverson during a meeting in Portland.
B-12.2 BEAK will calculate costs of habitat improvements and maintenance for each management unit for 100 years.
B-12.3 BEAK will prepare a maintenance schedule.
B-12.4 Recommend economist for review of costing data.
- B-13 Monitoring Plan - draft.
B-13.1 Identify areas to be monitored.
B-13.2 Identify purpose/goals of monitoring program for each management unit.
B-13.3 Specify frequency of monitoring visits, methodologies, types of data to be obtained.
B-13.4 Specify how data and analysis will be presented to PUD and agencies in a SOP document.
B-13.5 Identify procedures to be used for modifying mitigation practices if monitoring data and agency responses indicate this is necessary.
B-13.6 Produce draft monitoring program.
B-13.7 Incorporate monitoring program into schedule for implementation, operation and maintenance.
- B-14 Revise Management Plan - Draft 2, follow R-9 (see R-10 for costs).
- B-15 Work with PUD legal council]. *Response to PUD*
B-15.1 Advise PUD representatives who are responsible for obtaining landowner agreements, leases, etc. Document landowner agreements for final report.
- B-16 Revise Management Plan - Draft 3.
B-16.1 Conduct a meeting with PFC to discuss agency/landowner review. PFC will start step W-1₆ after meeting.
- B-17 Revise Management Plan - Draft 4.

E-29

R. Reports

R-1 Reconnaissance trip report (April 11). A summary of issues, goals, decisions and problems will be prepared. Report will be approximately five pages long.

-EES Tasks

R-1 Prepare and send trip report to BEAK. Report will provide public health/water quality input.

R-2 Prototype report (May 9). This report will summarize progress to date. Included will be: mitigation map showing cover types, timber types, sensitive water quality areas, known recreation areas, special wildlife resources. Years (1-5) implementation. Implementation criteria for life of project. Each map feature will receive a one to two page discussion resulting in a 10 to 15 page report with maps.

- EES Tasks

R-2 Provide public health water quality input to prototype report.

- PFC Tasks

R-2 Report: updated goals

R-2.1 Develop input for report of progress and accomplishments of resource team to date.

R-2.2 Review report.

R-2.3 Coordinate input from report into current activities.

R-3 Update goal report (May 9). This report will outline agency concerns, meeting notes and will propose solutions. Report will prompt updating project goals (C-3) in writing.

R-4 Meeting notes (May 21). A list of decisions and progress made in the HEP meeting will be prepared and forwarded to PUD.

R-5 HEP field trip report. Report will update HEP assumptions, list HEP scores in tables and provide brief habitat descriptions.

R-6 Field trip report (September 26) (see C-8.2 for hours). This will be a report to document HSI increases.

R-7 Draft 1 Mitigation Plan (October 1-15).

R-7.1 Report will follow Skookumchuck Plan (see p 5-9 for example) and outline (Section III) provided by PUD. 15 Mitigation Plans will be prepared, one for each management unit. Each plan will be about five pages long and will be accompanied by a base map with needed resource information.

R-7.2 Incorporate PFC and EES comments (October 20-21).

PM. Project Management

PM-1 Develop contracts with subs. PHW will work with PFC and Syverson. MEV will work with EES and RASL. PHW will play an advisory role on contracting during the first few months of the project.

PM-2 Computer runs. BEAK strongly recommends that the budget, manpower effort and schedules for the proposed project be controlled with computer software. This recommendation is based on the very high likelihood that the proposed scope of work will be changed in terms of work schedule (e.g., perhaps winter, instead of summer surveys, will be suggested by the HEP team); review schedule (e.g., perhaps agencies will not be able to turn around documents in one week or on schedule); and level of effort (e.g., perhaps surveys will not be required). When a change is necessary, the project team should not let the "ripple effect" of this change on schedule and budget and the manpower effort required to adjust the schedule and budget be a deterrent to effective project management. The computer will report on the new overall schedule (PDM chart), tasks for the next months (e.g., milestone meetings), manpower for the next three months, and budget progress. This computer report will serve as the basis for the monthly progress reports which will be prepared by the 20th of each month.

PM-3 Monthly reporting. The monthly report will list tasks accomplished, tasks proposed, labor and budget updates for BEAK and the subs, personnel changes, problems and proposed solutions to the problems. Each report will be about six pages and will be prepared by the project manager and his technical assistant. Technical progress will be reported in a series of trip reports, meeting notes and drafts and the final report.

The project manager will ask for a technical update by phone from the subconsultants once a month. The technical update will be included in the monthly report. Budget updates from the subconsultants will be sent to BEAK as invoices. Invoiced amounts will be compared to the quarterly (once per three months) projected budgets produced by the computer. Variations greater than ten percent from projected will be discussed and solutions will be offered.

PM-4 Weekly updates with the PUD and subs. The BEAK project manager will make a special effort to make weekly contacts with subconsultants that have work planned during a specific month. This contact will assure that the project scope will be coordinated.

R-8 Draft 2 Mitigation Plan will incorporate PUD comments (November 3-7).

R-9 Draft 1 Wildlife Management Plan (January 12 - February 4).

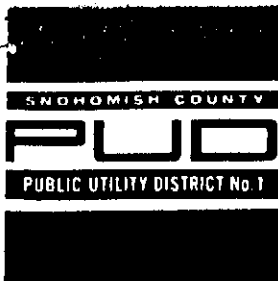
R-9.1 This draft include all aspects of PUD outline. Cost and schedule will be finetuned during a series of PUD and agency reviews. (January 12-23).

R-9.2 Incorporate PFC and EES comments.

R-10 Draft 2 Wildlife Mitigation Plan (February 11-20). Incorporate PUD review.

R-11 Prepare Draft 3 Wildlife Management Plan. This report will include agency landowner comments, a new HEP run and revised revenue data. (March 3-20).

R-12 Prepare ^{Wildlife Mitigation Plan} final draft. This report will include PUD and agency comments. March 30-April 9.



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address P O Box 1107, Everett, Washington 98206

March 19, 1986
 PUD 16760

Mr. Gary Engman
 Washington State Department of Game
 16018 Mill Creek Blvd.
 Bothell, WA 98012

Mr. Dave Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. Gwill Ging
 U.S. Fish & Wildlife
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Mr. James Bartelme
 U.S. Forest Service
 Mt. Baker-Snoqualmie
 National Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
Wildlife Mitigation Plan - Conference Call Minutes

Enclosed is a summary of a conference call between G. Engman (WDG), G. Ging (USFWS), and K. Bedrossian (District) conducted on March 12, 1986. The focus of the conversation was on the revised scope of work dated February 28, 1986, prepared by the consultants. If the agency participant's notes or recollections differ from ours, please notify K. Bedrossian (347-4374).

Thank you for your input and cooperation.

Sincerely,
 Original Signed By
 L. C. GRIMES

L. C. Grimes
 Chief, Generating Resources

Enclosure

cc: M. Vaughn, Beak Consultants

412U

*Attachment to
 District letter of 3/19/86
 Page 1 of 3*

Jackson Project - FERC #2157
 License Article 53
 Terrestrial Resources Mitigation Plan
Conference Call

DATE: March 12, 1986

ATTENDEES: G. Engman, Washington Department of Game; G. Ging, U.S. Fish & Wildlife Service; and K. Bedrossian, Snohomish County PUD

PURPOSE: Conference call to discuss revised scope of work prepared by the consultants (February 28, 1986). Discuss the need for agency input and agree on agency turn-around time needed for each agency review. Receive agency approval on the approach to mitigation planning outlined in the scope.

K. Bedrossian started the conversation by telling G. Engman and G. Ging that R. Metzgar would want to be able to tell the District Commissioners that the agencies are satisfied with the scope of work proposed. G. Engman indicated that the scope was "convoluted" and he would not "write off" on each step of the scope. His interest was to have an adequate plan and adequate mitigation for the terrestrial wildlife resource. He further indicated that he was most concerned about agency input, adequate check points by the agencies and that the PUD be responsive to agency requests for changes. G. Ging agreed with G. Engman and stated that he would like to receive information on the project from the PUD and provide review input, but not go out in the field and "solve the problem". He was concerned that if an agency review indicated a change should be made, that time should be allowed to make those changes.

G. Engman and G. Ging both stated that they would not be able to spend one or two weeks in the field participating in the HEP rating sessions. They both preferred that the District assess the HEP ratings and the agencies spend two days in the field reviewing the ratings. G. Ging stressed that he wanted reasonable ratings based on the habitat and potential actually there, not based solely on what the model says without being practical. They both do not want to get locked into accepting decisions made by the District or consultants at every step, and then be expected to approve the plan in final form. K. Bedrossian stated that at this point the District was asking for approval of the process not approval of what data might be put into the process.

K. Bedrossian guided both agency representatives through the various steps of the scope of work. Steps were clarified where needed. The update of the original HEP baseline information was discussed. K. Bedrossian stated that the agencies would be able to review procedures for updating the original HEP in Task A-2 and review the results of the update in Task A-3.

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Discussion then focussed on the level of effort required for recreation in the wildlife mitigation plan and Task B-8. It was agreed that recreation in the wildlife mitigation plan should be concerned with access and will be part of the specific mitigation plans for each management unit. Recreational development is covered under Exhibit R. G. Engman stated that the two plans should not be in conflict.

Both G. Engman and G. Ging stressed that if public access was not satisfactory to their agencies, then the lands proposed for mitigation would not be acceptable. Both agreed limited access will have to be approached on a case-by-case basis; however, it is not likely they would accept a large block of land as a wildlife sanctuary. G. Ging stated that they want reasonable access and that walk-in access of a few miles could be considered acceptable. G. Engman said he would need an approval from his supervisors on what distance hike-in was acceptable. Both agreed that limited access directly around Lake Chaplain was acceptable, but that they understood that access was allowed above the Lake. G. Engman said that a written agreement from the City of Everett that allowed access above the lake would be required before they would accept that property for mitigation. He said that he would need a copy of the letter R. Metzgar had sent him regarding acceptable public access prior to giving a preliminary answer on the acceptability of the City property for mitigation. G. Engman said that exclusion of access or absence of landowner agreements could be the fatal flaw in the mitigation plan.

G. Engman asked if the monitoring program (B-13) included plan evaluation. K. Bedrossian answered "yes".

G. Engman and G. Ging requested that an agency meeting be included in Task A-4. K. Bedrossian agreed to include such meeting in final scope of work.

Steps in the scope of work where agency input will be needed were discussed. Agency review turn-around time was agreed to as follows:

Task A-2, review evaluation species, cover types, target years, procedures for updating original HEP, and prototype report - 21 days.

Task A-3, review results of original HEP update and results of baseline evaluation of mitigation lands (including a two-day field trip)- 14 days.

Task A-4, review preliminary mitigation plans - 14 days.

Task A-6, review HEP evaluation of mitigation measures (including two-day field trip), review Draft 2 of the Mitigation Plan/adequacy of proposed mitigation - 14 days.

Task A-9, agency major review of the wildlife Management Plan - 30 days.

Task A-11, final review of Wildlife Mitigation Plan and agency letters to be included in final report - 30 days.

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E-33

G. Ging requested that the list of target species include species that represent wetland and old-growth habitat. The rationale for each target species should be stated.

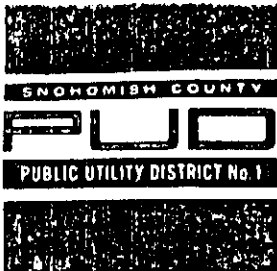
K. Bedrossian asked G. Engman and G. Ging if they had any problems with the completion date of the report since with the added review time the report would probably be completed in August 1987. Both agreed that all parties were trying to be realistic about the scope and the schedule, and that there was not a better alternative.

When asked if they approved the scope of work, G. Ging said he was satisfied as far as he could tell now and he saw no major flaws in the scope. G. Engman said the scope looked reasonable and he was as satisfied as he could be at this point.

Both G. Engman and G. Ging agreed to check their files for the original HEP models and back-up information.

(NOTE: G. Ging had not received the flow chart covering the scope of work prior to the conference call. A copy of the flow chart was mailed to him immediately following the phone conversation.)

412U



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

March 20, 1986
 PUD 16764

Mr. Gary Engman
 Washington State Department of Game
 16018 Mill Creek Blvd.
 Bothell, WA 98012

Mr. Gwill Ging
 U.S. Fish & Wildlife
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
 Terrestrial Wildlife Mitigation Plan
Public Access To Proposed Mitigation Lands

This is to respond to a recent telephone conference about the subject with Karen Bedrossian. The purpose of that conference was consultation about the proposed scope of work for preparing a revised terrestrial wildlife mitigation plan in accord with a FERC Order, 28 FERC# 62,249 issued August 22, 1984 as extended by order issued September 30, 1985.

During that conference, Bedrossian sought clarification about your criteria for acceptability/suitability of the Lake Chaplain and Lost Lake sites as regards public access. We are concerned that public access limitations at Lake Chaplain or other sites might be a potential 'fatal flaw'. The purpose of this letter is to clarify and resolve this issue before proceeding further with mitigation planning.

This issue was discussed in late 1985, specifically, during consultation about the Conceptual Outline and the District's proposed response to the FERC Order. At that time, Roy Metzgar conferred with City of Everett utility staff about City policy concerning public access in the vicinity of Lake Chaplain. Also, contact was made with the Washington Department of Natural Resources about that agency's logging road building plans in the Lost Lake area. You will find this previous discussion in our letter to you of October 16, 1985 (serial PUD-16589) on pp 6-7, plus map attachment. Copies of them are attached for your referral convenience.

416U

Mr. Gary Engman and Mr. Gwill Ging -2-

March 20, 1986

The public accessibility situation to the areas proposed in the terrestrial wildlife mitigation plan Conceptual Outline is discussed below. A partial U.S. Geological Survey quadrangle sheet is used for reference (copy attached, also).

Lake Chaplain

Roads open to the public, Lyon and Lake Chaplain, provide access to the northern and southern portions, respectively, of this site. These roads and related accessibility have been open to the public for years. The "restricted area" is the new water filtration plant at the south end of the Lake, the Lake shoreline, and the Diversion Dam. The City public utilities superintendent has advised that hike-in day use of the plateau above and to the east of the Lake is acceptable and such access/use has been and is available already. The Diversion Dam road gate presently located at the Lake Chaplain Road junction will be moved about one mile eastward near the City's property line. It is doubtful that two private owners will agree to granting public right-of-way beyond that point although they will be approached by the District. For public safety and project security the City and District want the remainder of the Diversion Dam road closed to public vehicular travel. Nevertheless, hiking would provide access, and the distance would not be excessive.

Lost Lake

Vehicle access is possible only via the Lake Chaplain Road, which is closed to the public at the water filtration plant, or a City pipeline service road from the west, which is blocked by private landowner restrictive covenants. However, direct drive-in public access would conflict with the high environmental quality values inherent in this site which should be protected. It is the District's understanding that reasonable hiker access (1-2 mile trail) would be acceptable to you. The DNR is building new logging roads into the area for future timber sales. It seems quite certain that a short trail (one mile or less) would connect the Lake with the new logging roads. In fact, Lost Lake may become too easily accessible.

Cascade Creek Watershed

This site is the Town of Sultan's municipal water supply. The area at the Dam and small pond is the most critical in terms of protection. All roads are gated. However, the Sultan Basin Road runs along the eastern boundary and the public has very easy access to most of the area, if they are willing to walk from the road. The Jackson Project power pipeline transits the northwestern corner of the area. The public can access some of that area via the Project's powerhouse access road. Since the area is a municipal watershed, public use/recreation are not encouraged, but they are occurring now on an informal basis.

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E-34

Mr. Gary Engman and Mr. Gwill Ging -3-

March 20, 1986

Mr. Gary Engman, Mr. Gwill Ging
Mr. David Somers, Mr. James Bartelme

October 16, 1985
PUD-16589

Jap Lake

This 40-acre parcel is privately owned. While bisected by the Sultan River Basin Road, it remains relatively secluded. The landowners treasure its privacy. They will probably prefer a sanctuary status for their property, if indeed, something could be arranged with them. The Jap Lake parcel is strategic in that it adjoins the Lake Bronson tract (600+ acres) which abuts both the Lake Chaplain and Cascade Creek. The Lake Bronson associates are contemplating timber management plans for their property. Coordination will be attempted with their plans with those of the District in the pending mitigation plan.

Williamson Creek Old Growth Timber

This site on the northeastern corner of Spada Lake is not shown on the enclosed maps. Public access is convenient to the area because the Williamson Creek Road runs right through it.

Public access and recreational use of wildlife resources can conflict with mitigation habitat management plans to benefit wildlife. Indeed, the plan's purpose is not public recreation. The proposed mitigation areas and contemplated habitat management techniques conform with HDG management emphases, namely, habitat protection and improvement especially for wetlands, riparian vegetation and winter range (Strategies for Washington's Wildlife). While consumptive and appreciative use of wildlife resources is of fundamental interest to your agencies, that purpose is and should be secondary with this Project's mitigation plan. Furthermore, the total acreage that is closed to the public is very small compared to the remainder of the Sultan River Basin open to the public for recreational use.

We hope that this issue can be resolved quickly and to our mutual satisfaction in order to initiate the pending planning study work. Because of the obvious importance that all parties attach to this issue, please indicate in writing to the District your criteria for acceptance of proposed mitigation lands in a final plan to be submitted to the Federal Energy Regulatory Commission. After transmittal of this letter, District staff will follow-up with personal contact to expedite your response.

Very truly yours,

Robert K. Schneider
Director, Power Management

Attachments

416U

6. The Licensee expects to obtain documentation from the involved agencies commenting on the progress and adequacy of the terrestrial mitigative plan for submittal to the Commission.

Pending: That is the principal reason for this communication.

Besides that which has been accomplished already or pending and discussed above, other important steps are pending. Briefings for the Districts' publicly-elected Board of Commissioners are set for October 22 (Executive Session) and 29 (Public Meeting) on plan development and implementation. Prior to staff recommendations to that Board for expenditure of substantial amounts of money for the plan, it is essential to have written statements from your agencies. (For clarification, these statements are the same as for the FERC - only one statement not two.)

Finally, as a further aid to you in preparing your comments, we have enclosed a copy of the pending submittal letter to the FERC. It is a draft and can be revised, as necessary, to reflect your pending comments. To do so however, will require telephoning Roy Metzgar (347-4319) by no later than noon on October 21 with any revisions.

During recent field trips and consultations about proposed mitigation sites, concern was expressed about accessibility to the public. Some sites are municipal watersheds and some are relatively inaccessible and in private ownership. Both watershed sites have been "open" to the public in limited

198U

-6-

Mr. Gary Engman, Mr. Gwill Ging
Mr. David Somers, Mr. James Bartelme

Page 2 of 4
October 16, 1985
PUD-16589

fashion for years. Roads open to the public provide access (see map attached). The definite, permanently closed areas are in the immediate vicinity of the reservoirs.

Concerning the two private sites, one is proposed as a possible acquisition by the District. That 220-acre site is surrounded on the south and west by State land managed by the DNR. Future public access possibilities to the site across State land via logging roads would appear to be excellent. The other smaller site (40 acres) will probably remain in private ownership. Since these sites involve real estate property matters with private ownership, premature public disclosure could jeopardize proposed concepts. Therefore, please handle confidentially any specific identification of those sites.

We are hopeful that you are satisfied with the results of recent activities. We realize that much remains to be done. It will be time-consuming and require substantial participation on your part. We appreciate your patience and cooperative assistance.

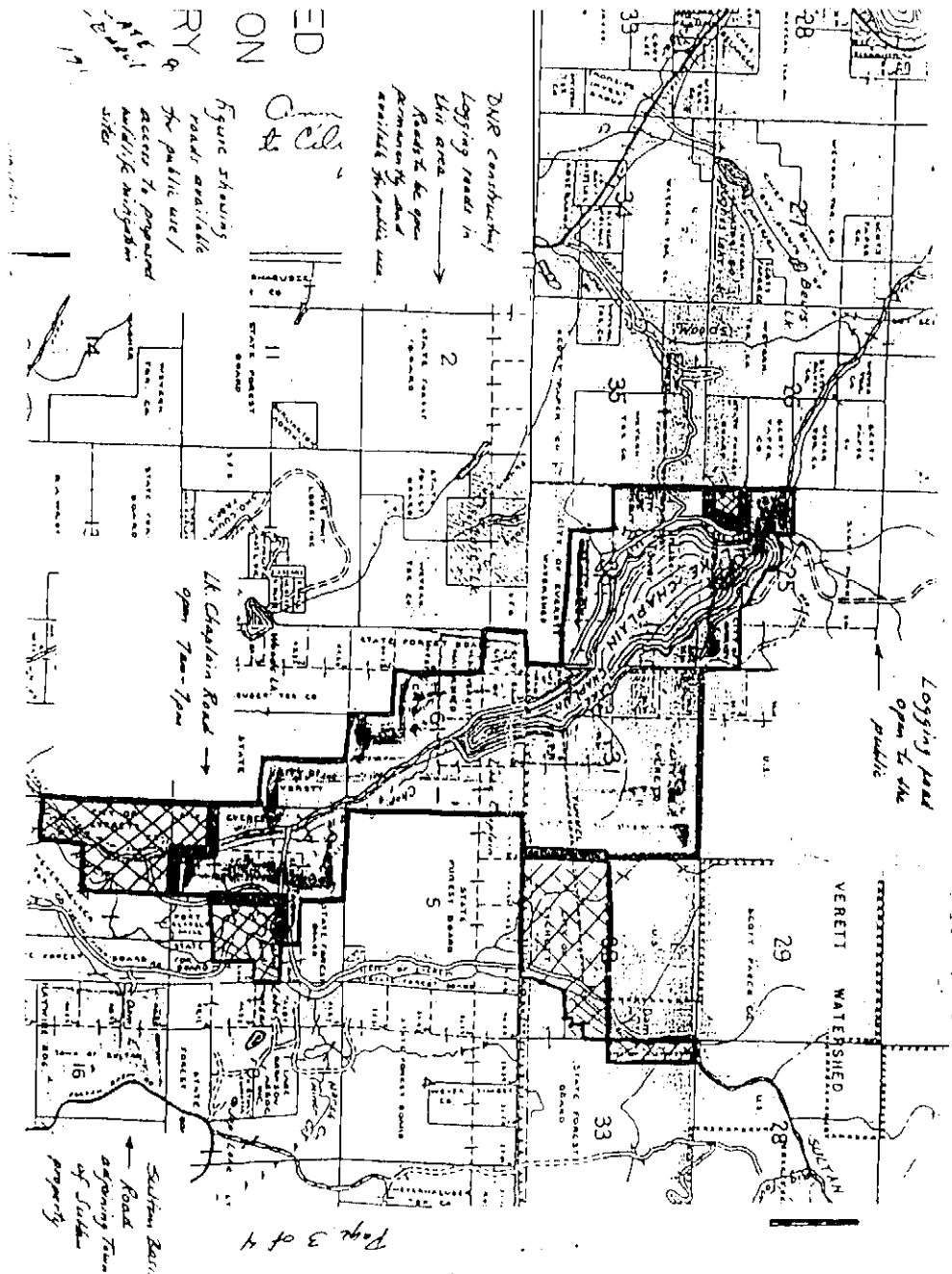
Very truly yours,

Original Signed By
R. K. SCHNEIDER
R. K. Schneider
Power Manager

Attachments
RGM:jk

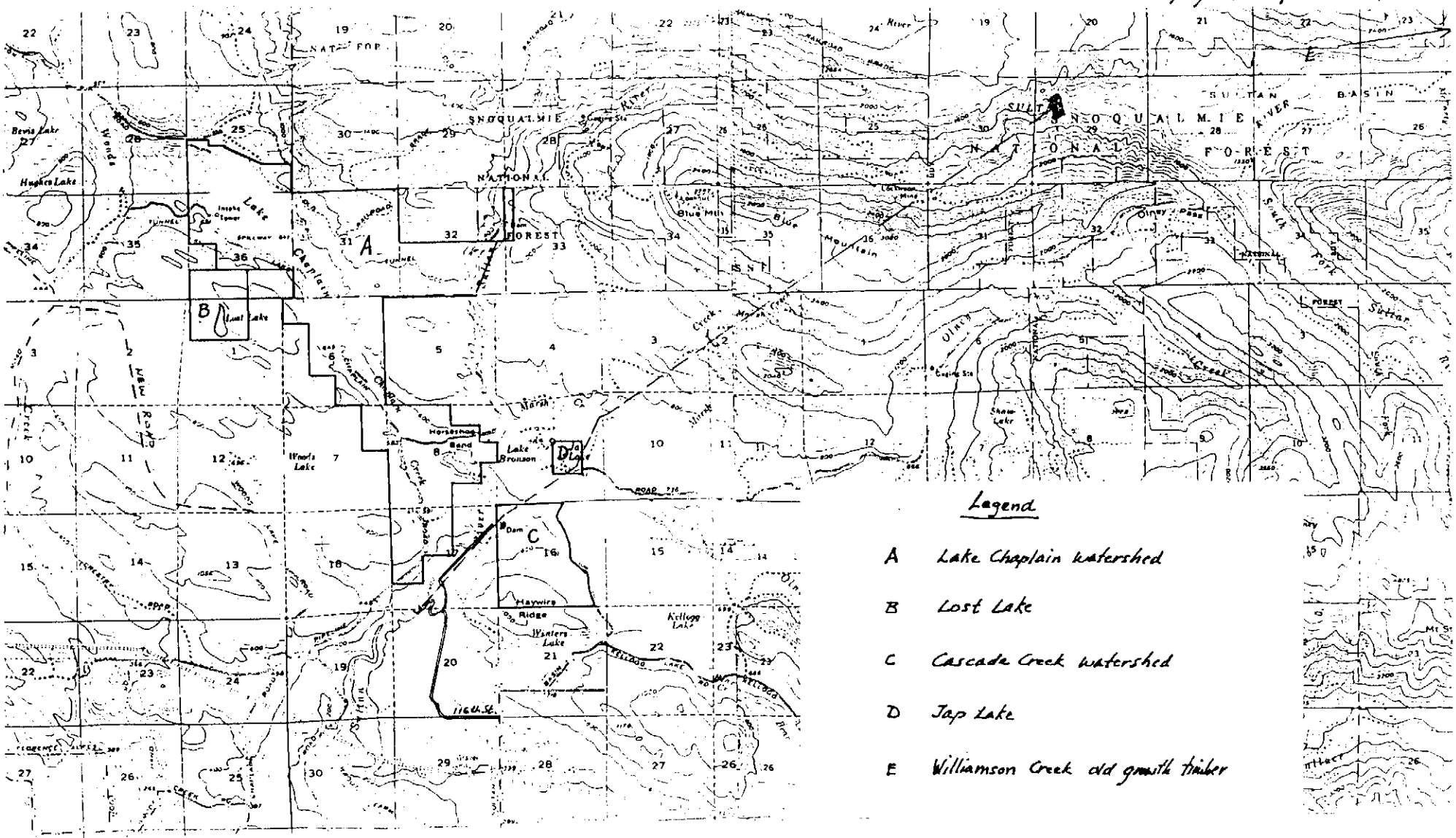
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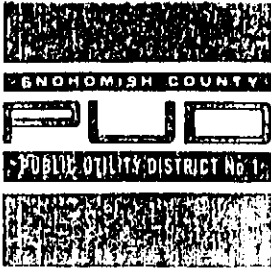
Page 3 of 4



Legend

- A Lake Chaplain watershed
- B Lost Lake
- C Cascade Creek watershed
- D Tap Lake
- E Williamson Creek old growth timber

E-37



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

May 7, 1986
 PUD 16830

Mr. Gary Engman
 Washington State Department of Game
 16018 Mill Creek Blvd.
 Bothell, WA 98012

Mr. Dave Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. Gwill Ging
 U.S. Fish & Wildlife
 2625 Parkmont Lane S.H.
 Olympia, WA 98502

Mr. James Bartelme
 U.S. Forest Service
 Mt. Baker-Snoqualmie National Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
 Wildlife Mitigation Plan - Public Meeting

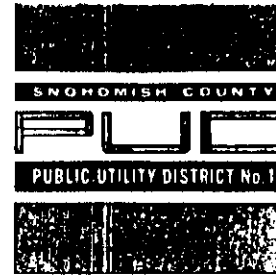
Roy Metzgar and Karen Bedrossian will present an overview of the plan development process to the public on May 28, 1986 at 7:30 p.m. The presentation will be held in the Commissioner's Public Meeting Room in the basement of the Electric Building at 2320 California Street in Everett. You are welcome to attend this meeting if you wish, however, we will be covering information which we have already presented to you.

We are planning an agency meeting (Task A-2) in the near future and will be contacting you in a couple of weeks regarding an acceptable date. The contract with Beak Consultants was signed last week so we will be moving ahead on the mitigation plan.

Sincerely,

L. C. Grimes
 Manager, Generating Resources

Clair Ollivers, City of Everett
 Mary Vaughn, Beak Consultants



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

July 2, 1986
 PUD 16935

Mr. Gary Engman
 Washington State Department of Game
 16018 Mill Creek Blvd.
 Bothell, WA 98012

Mr. Dave Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. Gwill Ging
 U.S. Fish & Wildlife
 2625 Parkmont Lane S.H.
 Olympia, WA 98502

Mr. James Bartelme
 U.S. Forest Service
 Mt. Baker-Snoqualmie
 National Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
 Wildlife Mitigation Plan - Meeting Notice

As a follow-up to your phone conversations with Karen Bedrossian, this is a reminder of the consultation meeting (A-2 in the Scope of Work) on July 15, 1986. The meeting will begin at 9:30 a.m. and will be held at the Everett Business Park in Conference Room "A" of Building C (maps enclosed). The meeting probably will take the entire day as we will be discussing evaluation species, cover types, target years, procedures for updating the original HEP and the Prototype Report.

Please call Karen Bedrossian at area code 206, 347-4374 if you need additional information.

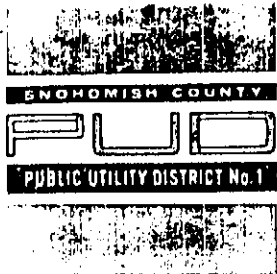
Sincerely,

Original Signed By
 L. C. GRIMES
 L. Chet Grimes
 Manager, Generating Resources

Enclosure
 KLB:jk
 cc: M. Vaughn, Beak Consultants (w/o enclosure)

1430

E-38



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

July 17, 1986
PUD-16960

Mr. Gary Engman
Washington State Department of Game
16018 Hill Creek Blvd.
Bothell, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502*

Mr. James Bartelme
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
Wildlife Mitigation Plan - Meeting Records

Enclosed, please find a copy of the meeting notes from the July 15, 1986 meeting (A-2 meeting). If your notes or recollections differ from ours, please so inform us. It was agreed comments, if any, would be provided to the District no later than August 19, 1986.

Topics discussed at the meeting included the Prototype Mitigation Plan, the outline of specific procedures for updating the impact HEP and performing the mitigation HEP, cover types, evaluation species, and target years. Agreement was reached on the cover types, the evaluation species and the target years. You (the agencies) requested a review period for the prototype report and the outline of the procedures for HEP. If you have any questions while you are conducting your review, please contact Karen Bedrossian (347-4374). We look forward to hearing from you.

Sincerely,

Original Signed By
L. C. GRIMES
L. Chet Grimes
Manager, Generating Resources

Enclosure
FIB:JK

cc: Clair Olivers, City of Everett
Gary Graves, City of Everett
Marsha Kearney, USFS
Marty Vaughn, Beak Consultants
Jerry Roppe

15/71

Attachment to District
letter of 7/17/86

Page 1 of 11

Jackson Project - FERC #2157
License Article 53
Terrestrial Wildlife Mitigation Plan
Meeting Minutes

Date: July 15, 1986
Place: Snohomish County PUD #1, Everett Business Park
Attendees: Gary Engman, Washington Department of Game (WOG); Gwill Ging, U.S. Fish & Wildlife Service (USFWS); James Bartelme, U.S. Forest Service (USFS); Marsha Kearney, USFS; Marty Vaughn, Beak Consultants; Gary Graves, City of Everett (City); Roy Metzgar, Snohomish County PUD (District); and Karen Bedrossian, District.
Purpose: Inform agencies of current status of mitigation plan development and obtain agency concurrence on the Prototype Mitigation Plan, the outline and procedures for updating the impact HEP and performing the mitigation HEP, cover types, evaluation species and target years.

Progress Report/Status of Activities

Progress on mitigation plan development was reviewed. Activities which have been completed include the field reconnaissance with the consultants and public meetings conducted in May, June, and July. A rough draft of the water quality constraints document has been prepared and is being revised. The prototype timber cruise has been completed and the main timber cruise is now in progress. The Prototype Mitigation Plan has been prepared and specific procedures for the HEP analysis were developed.

The status of each potential wildlife mitigation land tract was reviewed:

Lake Chaplain Tract - consists of approximately 1900 acres of City owned property. The timber cruise is currently being conducted on this tract. A portion of this tract was used for the prototype report.

Lost Lake - consists of approximately 205 acres. The District currently has an option to purchase this property and will have to make a decision by early January, 1987 to: (1) purchase the property, (2) renew the option to purchase the property or (3) no longer consider purchase of the property and relinquish the purchase option. The Lost Lake property has relatively high wildlife value with limited room for improvement. Mitigation value would come from preservation. This parcel of land is relatively expensive for wildlife mitigation because of assumed residential development potential.

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For the District to include the Lost Lake property in the mitigation plan, two assurances were requested from the wildlife agencies: (1) concurrence that the property would have been developed for residences in the next few years and (2) agreement to provide "bonus" HEP credit for this tract of land. The reasoning behind both of these requests was that the mitigation on Lost Lake will have a relatively high cost per habitat unit (HU). The District could obtain less expensive land that would provide higher HU values. As the District understands it, the Lost Lake property is of particular interest to the public and the agencies and therefore, obtaining this property may be of special value not reflected in the HEP process.

Discussion followed as to whether or not the property would be developed for residences in the next several years if the District did not obtain the property. The District understands that the current owner, Jobe, planned to divide the Lost Lake property into ten parcels. The District was informed by the Department of Natural Resources (DNR) that DNR roads were going into the area within two months to two years, which would provide access to the south portion of the property. Bartelme stated that he thought County codes and economic constraints would not allow residential development of this property. It was agreed that the District would contact the Snohomish County Planning Department regarding the zoning code, would look into the economic constraints of residential development and would provide a short report to the agencies as soon as possible. In the meantime, the District will postpone the timber cruise until a decision is reached on this property.

Ging stated that prior to agreeing on whether or not the District could get "extra credit", he would want to see what the results of the District's findings were on the feasibility of residential development. If the Lost Lake property is not developable, Ging suggested we release our option to purchase Lost Lake. Engman said he would want to discuss the matter with others at HDG prior to releasing the option because of recreation potential and public interest. Vaughn suggested that if the property is not developable the District could consider re-negotiating the purchase price. Both Ging and Engman will discuss with their supervisors whether or not they want the District to release the option on the property.

Project Lands - includes the power plant area (27 acres), the 115 kV transmission line (50 feet wide), wedge adjacent to power plant access road (11 acres), and pipeline right-of-ways (approx. 4 miles X 90 feet = approx. 44 acres). There appears to be reasonable potential for wildlife mitigation on these lands and they will be included in the mitigation plan.

Cascade Creek Watershed - the District is no longer considering use of this property for wildlife mitigation. The District met with the Town of Sultan and was informed that the Town was not interested in participating in this mitigation plan. The Town indicated that they wanted to maintain their flexibility to harvest the timber on their watershed whenever they needed revenue.

Jap Lake - the District is no longer considering this tract of land for wildlife mitigation. Ging had indicated previously that this particular tract was of the least priority to the agencies after their review of the conceptual outline. They did not think that the property would be developed and saw little potential for wildlife habitat improvement. The District's consultants agreed with his view and considering that tract of land was only 40 acres and was being considered for sale at half a million dollars, the District decided to no longer consider this property.

Spada Lake and Perimeter - this tract includes the reservoir and the 1425' - 1460' zone (412 acres). This includes the 1440' - 1450' "shoreline vegetation" zone which will be included in the overall mitigation plan.

Williamson Creek - consists of approximately 420 acres. New boundary lines for the Williamson Creek tract were discussed. After discussion, it was agreed that the south half of Option 1, Option 2 and property to the East of Option 1 (Williamson Bottom) would now be considered as the Williamson Creek tract. It was pointed out that the north half of Option 1 was no longer available as old growth. The north half of Option 1 was considered less desirable to the agencies when they reviewed Exhibit S (revised) and the agencies had requested consideration of the Williamson Bottom area. Potential problems with using Option 2 were discussed. The agencies were concerned that possibly this tract was too steep and also had previously considered reducing the size of Option 2 because of the high cost. The acreage needed in Option 2, for it to be a viable unit of old growth, will be evaluated. The District will discuss logging plans with DNR to find out what they would be looking at as far as viable logging units. The agencies were interested in including Williamson Bottom for mitigation lands. The agencies agreed that the Williamson Creek tract would be logged within DNR guidelines (all harvestable old growth in the Sultan Basin cut within 10 years) if the District did not use it for mitigation purposes.

Roy Metzgar discussed the potential land exchange between the USFS, DNR, District and City. This land exchange may result in additional old growth available for the mitigation plan. Old growth options will be evaluated as they develop in the land exchange process.

Prototype Mitigation Plan

The Prototype Mitigation Plan was reviewed and discussed on a chapter-by-chapter basis. Bedrossian stressed that the purpose of the Prototype Plan was to illustrate how the plan will be prepared, such as the level of detail to be provided, and the types of mitigation measures that will be proposed. The prescriptions in the Prototype Plan are examples and may not be in the final mitigation plan. However, the same level of detail will be included, but the prescriptions in the final mitigation plan may cover a larger area.

The objectives of the plan (pages 2-4) were discussed and agreed to by those present. The cover type priorities recommended previously by the agencies (Section 2.2, #3) were reviewed. It was agreed that old growth was highest priority, the mature riparian forest was second, wetlands was third and young riparian habitat was the fourth priority cover type. These priorities will be used for guidance in developing the mitigation plan, and taken into consideration if "trade-off" mitigation is necessary.

The process for developing the mitigation plan on timbered lands was briefly summarized. First, the forester cruises the land and develops a timber management plan based on optimizing revenues. Following that the wildlife biologists meet with the forester and water quality specialist and develop prescriptions to optimize wildlife value, but that are feasible from a timber management standpoint and meet water quality requirements. The baseline or "without mitigation" scenario used in the HEP process is based on the timber management plan optimizing revenue.

An example of those baseline conditions to optimize revenue from timber harvest was provided in Table 3 of the prototype report. Bartelme stated that he did not think that Table 3 provided an accurate example of timber management that would optimize revenue in on private land. He indicated that nonindustrial landowners cut at an earlier age for economic reasons and that slash burning probably would not take place. Bartelme stated that a 10 X 10 ft spacing for replanting was too dense. In fact, replanting might not be done at all, relying instead on natural reseedling. He also explained that pre-commercial and commercial thinning was not presently economical. He suggested that we revise the baseline plan to be typical of management that would be conducted by nonindustrial landowners (minimize efforts and maximize revenue). The effects of the suggested change in the baseline forest management plan on the wildlife mitigation plan were discussed. Everyone at the meeting agreed that it was justified to change the baseline plan as suggested.

The detailed objectives in the mitigation plan (section 4.1) were discussed. Bartelme suggested that under objective 5, the size of the maximum clear-cut (32 acres) to provide edge benefit was too large. He indicated that the USFS uses a 26-acre (maximum) clear-cut. This issue was discussed and it was also brought up that the shape of the clear-cut was probably the most important factor. Kearney suggested that we use a similar method as the USFS uses, which is to indicate the maximum distance from cover (e.g. 600 feet for black-tailed deer). It was agreed that Vaughn will clarify maximum size of clear-cuts for the final mitigation plan, based on biological requirements of the evaluation species.

Kearney suggested that the effect of roads should be taken into consideration in plan development. It was stated that the increased number of small clear-cuts as opposed to one large clear-cut would increase the road mileage that was required for timber management. Engman stated that he wanted there to be an accounting for the roads in the mitigation plan. Bartelme indicated that increased road development would increase the cost of the plan and should be included in the cost analysis.

Ging stated a concern over objective 7 which reads "consider methods of forest management which optimize harvest revenues without reducing wildlife values". He was assured by the District that the purpose was to optimize wildlife values, but that if two options were available that had the same wildlife value, the option which had the greatest revenue benefit would be selected. It was suggested that the District re-word that objective so that it is clear that we are planning to optimize wildlife values and that timber revenues take less priority.

The prototype prescriptions were discussed. Bedrossian stated that the rationale and/or references for specific prescriptions will be provided in the final plan, and prescription rationale will be related to the wildlife species which will benefit from those measures. Wildlife species models were not included in the Prototype Plan because the models will not be developed until concurrence is obtained from the agencies on the evaluation species. The issue of snags was brought up by the Forest Service. It was stressed that OSHA regulations must be considered in snag retention strategies. Kearney stated that the USFS leaves patches of snags and future snags so that the undergrowth vegetation is preserved while complying with OSHA requirements.

Bartelme commented on water quality constraints in Section 4.2 related to limiting tractor skidding to slopes less than 30 percent on the Lake Chaplain shoreline. He noted that it may be appropriate to limit tractor skidding throughout the watershed because of the potential for disturbing small, unmapped pockets of highly erodible lacustrine soils. The District stated that soil erosion will be considered in development of the final plan and measures will be taken to protect water quality in the basin.

The monitoring section (page 32) of the Prototype Plan was discussed. The agencies indicated that they will probably want annual reports or possibly a report every two to five years once implementation is completed. Bartelme indicated that if any mitigation was on USFS lands, USFS would require an annual report every summer. Engman stated that in addition to a progress report, the agencies would want the District to consult with them. Bartelme suggested that we include a process for revising the mitigation plan if that became necessary as a result of a major habitat change in the basin such as a large forest fire or as a result of the mitigation monitoring program. The agencies stated that they would use the meeting notes as a basis for writing their comment letters on the Prototype Plan.

Outline of HEP - Species List

An outline of the procedures for updating the impact HEP and for performing the mitigation HEP was provided to those present at the meeting. As part of that outline, a list of proposed evaluation species and a justification for each of those species was presented. The species proposed as evaluation species in the HEP process included the mallard, common merganser, osprey, ruffed grouse, black-capped chickadee, song sparrow, Douglas squirrel, beaver, pine marten and black-tailed deer. Following a lengthy discussion on the evaluation species and priority cover types, those at the meeting concurred that the evaluation species proposed should be included in the HEP study with the exception of the song sparrow which could be removed from the list since many of the cover types it represents are represented by the black-tailed deer. Kearney suggested, and it was agreed, that the pileated woodpecker be added to the evaluation species list to represent other components of the old growth forest not represented by the pine marten. Ging and Bartelme requested that the HU values for one evaluation species representing each priority cover type be isolated in an effort to identify the impacts to the four priority cover types and also to document the value of mitigation for the four cover types. It was agreed to isolate the mature riparian HU's for ruffed grouse, the wetland HU's for beaver, the old growth HU's for pine marten and the young riparian HU's for black-tail deer.

HEP - Cover Types

A list of cover types to be used in mapping and in HEP was provided. Definitions of each cover type were included. It was pointed out that an effort was made to describe these cover types in terms important to wildlife as opposed to specifying age of forest stands. It may be possible to achieve the characteristics of mature cover types sooner through intensive management in the mitigation program than would occur naturally. Bartelme suggested that the proposed pole stage coniferous forest category be divided into two separate categories. He

will provide information to Vaughn who will develop descriptions of those two categories. It was agreed that under the young riparian/deciduous forest category, the phrase "that receives seasonal flooding" will be removed from the cover type description.

HEP - Study Area

The proposed study area was defined by the District as the inundation zone up to 1360' for Stage I and for Stage II, the inundation zone up to 1450' plus 168 acres of disturbed areas downstream. Bedrossian pointed out that the extensive USFS' clear-cut above the inundation zones would be excluded, based on the following factors. The HDG report (1982) stated that it was USFS that elected to clear-cut much higher than the project boundaries and that "this action was not requested by the Licensee nor are the exact reasons for it known" (page 179 of HDG 1982). The District also indicated that the FERC project license and the USFS MOU with the City and the District, both specify clear-cutting within project boundaries which do not include the additional massive clear-cut area. The HDG report included the entire 3500+ acres that was clear-cut in their HEP analysis. The revised Exhibit S (1983) did not include any of the clear-cut area above the inundation zone and in fact, the Exhibit S assumed all old growth had been removed prior to project construction. The District is proposing to include the old growth and other existing vegetation that was below the 1360' or Stage I level and vegetation below the 1450' or Stage II level as described in these notes under annualization parameters. This is a compromise between the HDG report and the Exhibit S. The District has an acreage breakdown for the 750-area inundation zone and will use those figures. It was the District's understanding, based on the agencies' comments on the revised Exhibit S, that the agencies were willing to forego debate on this issue and leave the impacts as they were stated in the revised Exhibit S, in the interest of compromise and developing an acceptable mitigation plan. The District's proposal is a compromise addressing the HDG report and Exhibit S figures in an effort to resolve this issue.

Ging indicated that he would like to review the USFWS statement before he concurs with the proposal. Bartelme stated that as he understood it, there was an agreement between USFS and the City of Everett regarding public access, and that the USFS cut the large area of old growth forest because public access would be restricted on the north shore. He also indicated that there had been timber sales and cutting in the project area prior to initiation of Stage I. Bartelme stated that to include all of the USFS clear-cut was not reasonable, but to exclude all of it was also not reasonable, and we should reach a compromise. As stated previously, the District has proposed a compromise between the HDG report and the revised Exhibit S positions.

HEP - HSI's

The process for determining habitat suitability was discussed. A table presenting the evaluation species and the cover types, including the HSI values under each category was presented. Ging and Engman stated that they would need more time to look at the HSI values. Bartelme said that USFS would be satisfied with the USFMS and MDG responses. It was agreed that the acreages of terrestrial habitat used by osprey would be reviewed and the HSI values adjusted so that a smaller area of habitat was included but a more realistic HSI value was used. It was also agreed that for mallard and beaver, one category, "reservoir", in place of the deep reservoir and shallow reservoir categories would be used. Usable area within the reservoir will be calculated separately for each species using the reservoir, based on biological requirements.

HEP - Target Years

Target year were discussed. Those target years presented were agreed to with one exception. Ging stated that 1959 would have to be used as a baseline since in the HEP process, the baseline plus year one (1), is required. It was pointed out that it would be a 100 year analysis period and that the mitigation program would be approximately 70 years.

HEP - Annualization Parameters

Annualization parameters were discussed. The District proposed that a 5 percent removal of timber per year be used for annualization without the project. It was pointed out that this was a compromise of 1% per year which was used in the MDG report and the assumption that all of the timber would have been cleared within three years in the revised Exhibit S report. Bartelme stated that 1% per year was probably conservative and referred to his letter to the District dated August 27, 1982, wherein he suggested that removal rates of 3% per year from 1964 - 1984 and 1% per year from 1985 - 2025 were probably more realistic. He suggested that the District look at the harvest records from below Culmback Dam on USFS land as an example. He stated that 30% of the old growth was left standing and would remain indefinitely in the canyon below Culmback Dam. The District will look at USFS information and respond to the agencies in the meeting notes.

Supplemental Information:

Based on information provided by USFS for areas above and below Culmback Dam, the District proposes that the following assumptions be used for calculating the rate at which the Stage I and Stage II inundation zones would have been logged without the project:

- a) All commercial timberlands within the inundation zone would have been logged by 1985 (this is similar to what has occurred below Culmback Dam).
- b) Some of the commercial timberlands below the inundation zone were logged or scheduled to be logged prior to project construction (before 1961). USFS maps will be used to identify these areas and their post-logged condition will be used for the baseline (without project) HEP analysis.
- c) Streamside management areas along the Sultan River (North and South Fork and the main stem) and Williamson Creek would have been logged at a rate of 1% per year beginning in 1960. Based on an estimated stream length of 9 miles and an average streamside management zone width of 75 feet on either side of the river, the total area in this category is 164 acres, or roughly 9% of the inundation zone.
- d) Five percent of the forest lands within the inundation zone never would have been logged because of steep slopes or prohibitive soil conditions. This is an estimate based on reviewing topographic maps and conversations with USFS. The total amount of unlogged land below Culmback Dam is approximately 30% (including streamside management areas), but the canyon below the dam is considerably steeper and more difficult to log. The inundation zone is relatively flat compared to other areas in the basin, therefore, most of it would have been considered commercial timberland.

Meeting Notes Continue: HEP - Calculations and Analysis

The calculation and analysis methods as presented in the outline were discussed with the agencies. The District stated that HSI figures for the pileated woodpecker would be provided along with the meeting notes (attached).

Summary

It was agreed that agency comments would be in writing to the District by August 19, 1986, with the exception of comments by Ging, who will phone Bedrossian by August 19 and will follow up with a written report shortly thereafter. Agency comments should include the following subjects: 1) discussion of Lost Lake tract assumption of development and extra credit, 2) review of the Prototype Mitigation Plan, and 3) review

of the outline of procedures for updating the impact HEP and for performing the mitigation HEP including project boundaries and timber removal assumptions.

Next Meeting

October 1, 1986, was reserved for the next meeting. However, the next meeting (A-3) will include a review of the results of the impact HEP update, and the results of the baseline evaluation of mitigation lands which includes a 2-day field trip. The District and its consultants have reviewed the project schedule and have tentatively rescheduled October 9 and 10 for the A-3 meeting instead of October 1. Please confirm that date in your comments or suggest another 2-day period near that date when you are available.

Other Agency Consultation

We will be sending evaluation species HEP models for your review in early August and will be requesting a two-week turnaround time for comments.

cc: Attendees of Meeting
 D. Somers, Tulalip Tribes
 C. Olivers, City of Everett
 Jerry Roppe

E-44

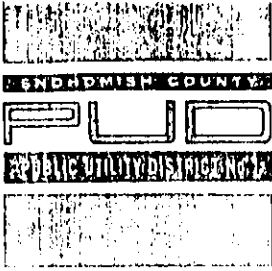
JACKSON PROJECT TERRESTRIAL RESOURCE MITIGATION PLAN

HABITAT SUITABILITY INDICES (HSI'S) FOR UPDATE OF 1982 HEP

HABITAT TYPE	EVALUATION SPECIES									
	Mallard	Common Nerganser	Osprey	Ruffed Grouse	Bl.-cap. Chick.	Pileolated Noddy	Doug. Squirrel	Beaver	Pine Marten	Bl.-tailed Deer
Clearcut	--	--	--	0.37	0.38	--	--	--	0.30'	0.62
Early Stage	--	--	--	0.20	0.46	.21	0.50	--	0.10'	0.34
Intermediate Con.	--	--	--	0.40	0.70	.4"	0.80	--	0.50'	0.55"
Rid Growth	--	--	0.30'	0.40	0.70	.9"	0.50	--	0.78"	0.76"
Young Rip.	0.54	0.10	0.60'	0.57"	0.62	--	--	0.78'	--	0.70"
Mature Rip.	--	--	0.80'	0.70"	0.50	.8	0.30	--	0.60'	0.70"
Forest For.	--	--	--	0.43	0.48"	.28'	0.25	--	0.60'	0.69"
Wetland	0.54	0.10	0.20'	0.50"	0.62	.53"	--	0.78"	--	0.78"
Shrub	--	--	--	--	0.38	--	--	--	0.30	0.62
Grassland	--	--	--	0.50'	0.30'	--	0.10'	--	0.20'	0.70'
River/Str.	--	0.61"	0.70'	0.43	0.55	.45	0.25	0.27"	--	0.53
Peep Reser.	0.20	0.20	0.90'	--	--	--	--	0.10	--	--
Shal. Reser.	0.20	0.20	0.90'	--	--	--	--	0.30	--	--
Rock/Road	--	--	--	--	--	--	--	--	--	--

HSI values derived from HEP study done by WDG, USFWS, and BEAK on North Fork Snoqualmie River, unless otherwise noted.

* HSI values derived from 1982 HEP for Jackson Project
 HSI values derived by BEAK from literature and/or experience



2320 California St., Everett, Washington 98201 258 8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

July 23, 1986
 PUD - 16973

Mr. Dave Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Dear Mr. Somers:

Re: Jackson Project - FERC #2157
 Wildlife Mitigation Plan - Meeting Records

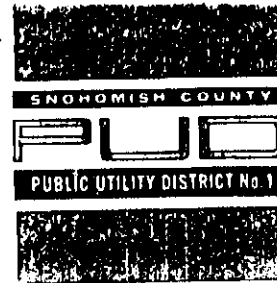
Enclosed are the minutes from the agency meeting conducted on July 15, 1986 and a copy of the information distributed at that meeting. Please review this information and send your written comments to Karen Bedrossian by August 19, 1986.

Very truly yours,

Original Signed By
 L. C. GRIMES
 L. Chet Grimes
 Manager, Generating Resources

Enclosures

0.921



2320 California St., Everett, Washington 98201 258 8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

August 6, 1986
 PUD-16990

Mr. Bill Wallace
 Department of Natural Resources
 919 North Township
 Sedro Woolley, WA 98284

Dear Mr. Wallace:

Jackson Project - State Lands
Terrestrial Wildlife Mitigation Plan

The Snohomish County PUD (District) has an interest in certain State lands. The purpose of this letter is to explain our interests and present proposed plans in order to assure compatibility with Department of Natural Resources (DNR) procedures for later negotiations to obtain, if possible, the use of State lands by the District.

The District is developing a terrestrial wildlife mitigation plan under Federal Energy Regulatory Commission order, to offset affects to wildlife resources as a result of the Jackson Hydroelectric Project. The mitigation program would have a duration of approximately 70 years. As part of the mitigation plan, the District is considering approximately 420 acres of old growth conifer forest and riparian habitat on lands administered by the DNR in the Williamson Creek area of the Sultan Basin (T 29 N; R 9 E; portions of Sections 12, 13, 14, 23, and 24; and T 29 N; R 10 E; a portion of Section 7 - see enclosed maps). The District's interest in these specific lands is due to the direction of fish and wildlife agencies responsible for wildlife resources. Wildlife management prescriptions would be developed for these lands, which might include such techniques as retention of old growth conifers and mature riparian vegetation, and development and management of wetlands. The District has been discussing this issue with Mr. Don Farwell for sometime and he suggested that we should write to you and explain our plans.

The District intends to have its forester conduct a 20% strip, form class cruise of these potential mitigation lands and prepare an appraisal based on that timber cruise. Prior to conducting the timber cruise and preparing the appraisal, we would like confirmation from the DNR that our proposed method is acceptable as a basis for subsequent negotiations about the value of these lands and for obtaining their use by the District for wildlife mitigation purposes.

198U

E-45

Mr. Bill Wallace
Department of Natural Resources

-2-

August 6, 1986
PUD-16990

To meet the schedule for preparing the mitigation plan in accord with the regulatory order, the timber cruise must be done in mid-August, 1986. Therefore, the District seeks DNR's written acceptance or affirmative confirmation as soon as possible about proposed methods in the pending timber cruise. In order to assist you in responding, Karen Bedrossian, PUD Environmental Coordinator, has contacted you directly about this matter. She will be able to answer any questions about the District's wildlife mitigation plan and proposal concerning State land in the Sultan Basin.

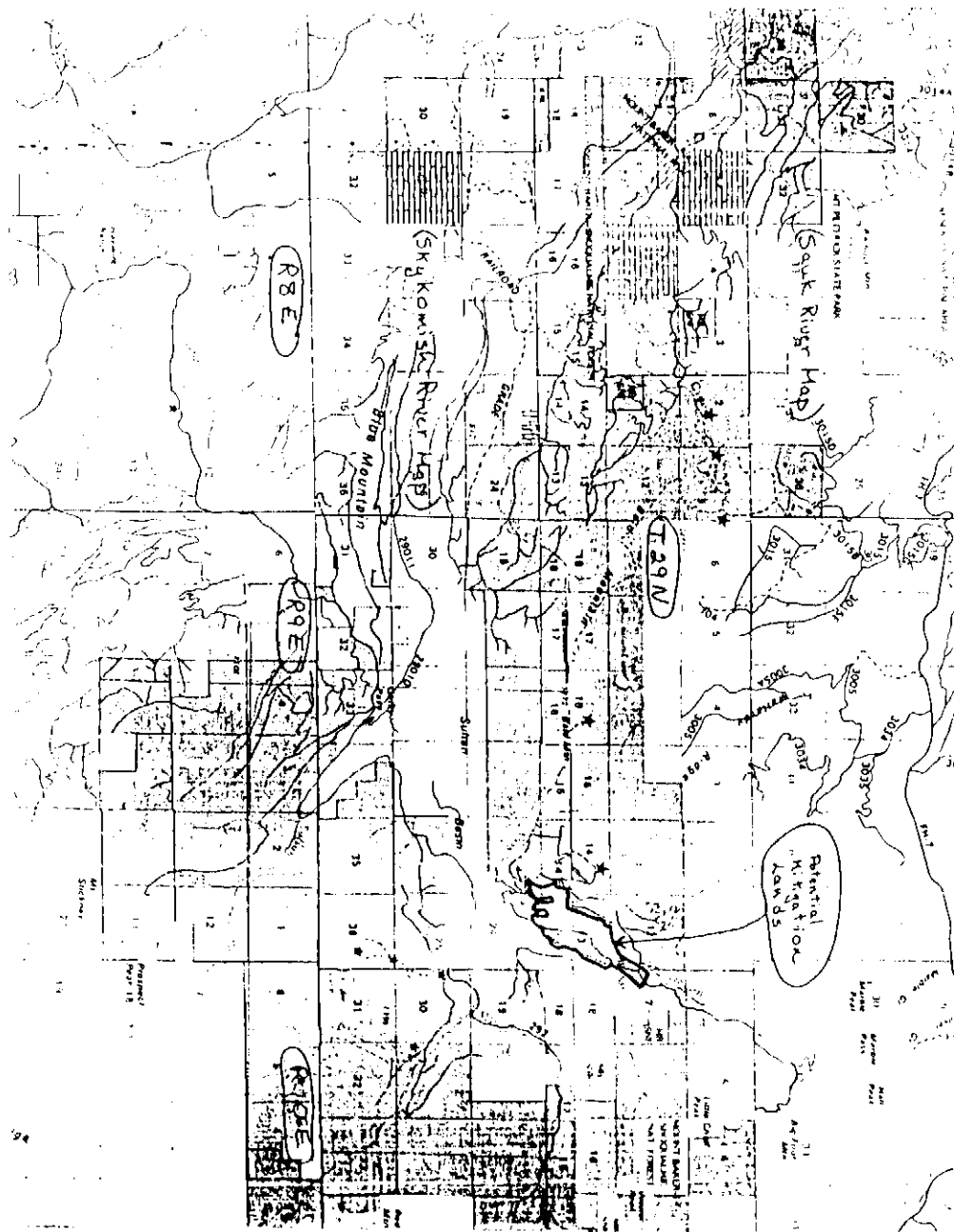
Very truly yours,

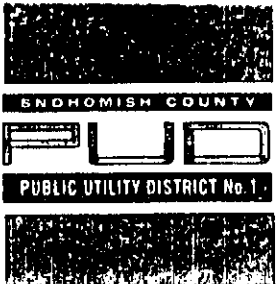
Original Signed By *for LCO*
C. A. Lang
L. Chet Grimes
Manager, Generating Resources

Enclosures
RGM:jk
cc: D. Farwell, DNR

E-46

198U





2320 California St., Everett, Washington 98201 258-8211
Mailing Address P. O. Box 1107, Everett, Washington 98206

August 6, 1986
PU0-16992

Mr. James Bartelme
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie National Forest
Skykomish Ranger District
Skykomish, WA 98288

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Gwill Ging
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Gentlemen:

Jackson Project - FERC #2157
Terrestrial Wildlife Mitigation Plan
Lost Lake Development Potential

During the meeting on July 15, 1986, regarding the Wildlife Mitigation Plan, it was agreed that the District would prepare an evaluation of the development potential of the Lost Lake tract proposed for inclusion in the Revised Terrestrial Wildlife Mitigation Plan. The information obtained would be presented to you for review and comment (ref. meeting minutes for background information).

The District requests agency response on the following points based upon your review of the attached District staff report on Lost Lake development potential/constraints.

- 1) Do you concur that the property would be developed in the next few years?
- 2) What is the desirability of the property for mitigation purposes?
- 3) Do you recommend that the District retain or release the purchase option?
- 4) Do you agree that "bonus" HEP credit is merited for the property due to its relatively high per acre financial cost?

Lost Lake Development Potential -2-

August 6, 1986
PU0-16992

Please include your response to these points in your comments to the District on other meeting items. It was agreed that written comments would be received by the District no later than August 19, 1986, excepting those from the U.S. Fish and Wildlife Service. Please contact Karen Bedrossian for any clarification or additional information.

Very truly yours,

Original Signed By
L. C. GRIMES
L. Chet Grimes
Manager, Generating Resources

Attachment
RGM:jk
cc: C. Olivers, City of Everett

E-47

*Attachment to District
letter of 5/6/86
Page 1 of 2*

Henry M. Jackson Hydroelectric Project
FERC Project No. 2157 - License Article 53

Terrestrial Wildlife Mitigation Plan (Revised)

Evaluation of Lost Lake Property Development Potential

August, 1986

Public Utility District No. 1 of Snohomish County

Page 2 of 2

TABLE OF CONTENTS

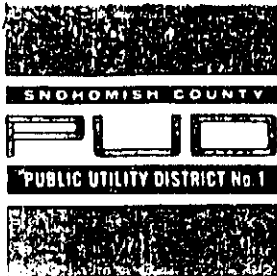
Snohomish County Zoning Code

Property Development - Access Economics

Development Feasibility - Summary

0199U

E-48



2320 California St. Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

August 11, 1986
 PUD-17005

*Attachment to District
 letter of 8/11/87
 Page 1 of 9*

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
 JACKSON PROJECT - FERC NO. 2157
 LICENSE ARTICLE 53
 TERRESTRIAL RESOURCES MITIGATIVE PLAN
 PUBLIC MEETING SUMMARY

DATE: May 28, 1986
 PLACE: Snohomish County PUD, Electric Building, Everett
 ATTENDEES: See attached list.
 PURPOSE: To inform the public of the wildlife mitigation planning activity that the District is initiating to offset losses to wildlife as a result of the Jackson Hydroelectric Project and to provide the public an opportunity to comment.

Mr. Gary Engman
 Washington Department of Game
 16018 Mill Creek Blvd.
 Mill Creek, WA 98012

Mr. Will Ging
 U.S. Fish & Wildlife
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Mr. James Bartelmg
 District Ranger
 U.S. Forest Service
 Mt. Baker-Snoqualmie Nat'l Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Mr. Dave Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Gentlemen:

Jackson Project - FERC No. 2157
 Terrestrial Wildlife Mitigation Plan
Public Meeting Summaries

Enclosed, please find copies of summaries of presentations conducted by the District in May, June, and July. If you have questions or comments about the meetings, please contact Karen Bedrossian at 347-4374.

Sincerely,
 Original Signed By
 L. C. GRIMES

 L. Chet Grimes
 Manager, Generating Resources

Enclosures

KLB:jk
 cc: C. Olivers, City of Everett
 M. Vaughn, Beak Consultants

Snohomish County PUD (District) announced the public meeting in local papers and sent announcement letters to the Everett Mountaineers, Pilchuck Audubon Society, Snohomish County Sportsmen's Association, U.S. Fish & Wildlife Service, U.S. Forest Service, Washington Dept. of Game, Tulalip Tribes, Evergreen Coalition, Sierra Club, and other interested individuals. In the future when the District is planning to hold a public meeting, those individuals who signed the attendance list of this meeting will receive announcements and announcements will be published in local papers.

R. Metzgar and K. Bedrossian (District staff) gave a 30-minute presentation, including slides. R. Metzgar presented a description of the Jackson Hydroelectric Project, provided a brief Project history and discussed previous environmental mitigation conducted by the District. Federal Energy Regulatory Commission (FERC) requirements for developing the wildlife mitigation plan were presented including FERC requirements for consultation and coordination with key government agencies. These agencies include U.S. Fish & Wildlife Service, U.S. Forest Service, Washington Dept. of Game, and the Tulalip Tribes. The process for selecting consultants to assist in preparation of the plan was explained.

K. Bedrossian presented habitat management examples to provide the public with a general idea of what types of mitigation measures are being considered for the wildlife mitigation plan. Wildlife/forestry management techniques, development and management of wetlands, seeding and fertilizing, and nest boxes were some examples given. Habitat Evaluation Procedures, the systematic method that will be used to assist in measuring the value of the wildlife mitigation plan was briefly described. K. Bedrossian gave a summary of the consultant's contract Scope of Work and outlined seven core process activities, discussed the products that will result from those activities and provided estimated completion dates. The target date for completion of the Wildlife Mitigation Plan is mid-August, 1987.

The meeting was opened for public comment. Most comments centered around the issue of public access. Members of the sportsmen's clubs were concerned that public access would not be available on the mitigation lands, specifically City of Everett properties that are proposed for use in the Wildlife Mitigation Plan. The District stated that the wildlife agencies shared that concern and a certain amount of public access is one of their

requirements of the mitigation plan. Other individuals present indicated that in some cases, lack of public access might be more desirable. The conflict of increasing the value of wildlife habitat and public use of wildlife mitigation land was also discussed.

Several attendees provided information on species present in the Project area as well as individuals who would be a good source of information regarding wildlife use in the Sultan Basin. Several people indicated an interest in the Lost Lake property and Ida Lake. Those present at the meeting were pleased that the District was considering obtaining the Lost Lake property. The Lost Lake property is currently closed to public access by the current owner. The District indicated that they would allow public access if they obtain the property, probably from the south end with an easement through DNR property.

It was suggested that the District hold a public meeting in Sultan so that local people would have a better chance to attend the meeting and provide comments and information. The District indicated that they would be holding another public meeting once draft wildlife mitigation plans were developed.

Attachment
KLB:jk

E-50

ATTENDANCE LIST

NAME	ORGANIZATION	ADDRESS	PHONE NO.
<i>Joseph Bentley</i>	<i>Winnipeg</i>	<i>117, 154 - 22nd</i>	<i>691-6147</i>
<i>Bob Weir</i>	<i>Wildlife Dept</i>	<i>117, 154 - 22nd</i>	<i>691-7212</i>
BOB HEIRMAN	SNOH. CO. SPORTSMEN	1920 LAKE ST SNOHOMISH	568-4083 V
<i>Gene Langstaff</i>	<i>mining</i>	<i>20427-38203</i>	<i>794-6329 V</i>
<i>Mark Hanson</i>	<i>SUNSHINE</i>	<i>Box 627</i>	<i>793-0813 V</i>
Doyle Downs	TRAPPER	Box 64 Sultan	793-0924 V
<i>John Johnson</i>	<i>SNOHOMISH CO FISH</i>	<i>Box 113, Snohomish</i>	<i>794-5536</i>
<i>Mark Johnson</i>	<i>SULTAN SPORTSMAN</i>	<i>Box 555 Sultan</i>	<i>793-1869 V</i>
<i>Mark Knapp</i>	<i>BEAK</i>	<i>Box 100 Sultan</i>	<i>451-3628</i>
<i>Steve Ruff</i>	<i>909 Brodeur</i>		<i>252-9656</i>
<i>Carl Kunkin</i>	<i>Brodeur</i>	<i>2006 5th Ave W, Snohomish</i>	<i>(800) 983-6357</i>
<i>Mark W. Hark</i>	<i>Self</i>	<i>P.O. Box 911, Sultan</i>	<i>793-2746</i>
<i>Mark Wood</i>	<i>Self</i>	<i>2007 11th St SE</i>	<i>793-0825</i>
<i>Jim S. ...</i>	<i>Self</i>	<i>1000 1st Ave N, Snohomish</i>	<i>794-7293</i>
<i>John Williamson</i>	<i>W. Sports</i>	<i>1000 1st Ave N, Snohomish</i>	<i>355-9467</i>
<i>John ...</i>	<i>W. Sports</i>	<i>1000 1st Ave N, Snohomish</i>	<i>743-4274</i>

FURTHER INFORMATION

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
 JACKSON PROJECT - FERC NO. 2157
 LICENSE ARTICLE 53
 TERRESTRIAL RESOURCES MITIGATIVE PLAN
 PUBLIC MEETING SUMMARY

DATE: June 9, 1986
 PLACE: Sultan Town Hall
 ATTENDEES: Sultan Town Council and Town Council meeting audience.
 PURPOSE: To inform the Sultan Town Council of the status of the District's Wildlife Mitigation Plan development process and to obtain concurrence from the Town of Sultan to use their Cascade Creek Watershed as mitigation lands in the Plan.

R. Metzgar and K. Bedrossian (District staff) gave a 20-minute presentation, including slides. R. Metzgar provided a brief description of the Jackson Hydroelectric Project and a brief Project history. Environmental mitigation measures taken by the District during the construction of the Jackson Project were summarized. Federal Energy Regulatory Commission (FERC) requirements for the Wildlife Mitigation Plan were described. Selection of the consultants to provide technical assistance to the District in Wildlife Mitigation Plan preparation was explained. Consultation and coordination with the City of Everett, and the key governmental agencies was discussed.

K. Bedrossian presented habitat management examples to give the Town Council a general idea of what types of mitigation measures are being considered for the Wildlife Mitigation Plan. K. Bedrossian described the Habitat Evaluation Procedures, the systematic method that will be used to assist in assessing the value of the Wildlife Mitigation Plan. K. Bedrossian summarized the consultant's contract Scope of Work for mitigation plan development and identified seven core process activities and estimated completion dates for those activities.

The District presented background on previous consultations with the Town of Sultan regarding use of the Cascade Creek Watershed and discussed what future activities would be needed in order to continue consideration of the Cascade Creek Watershed. R. Metzgar explained that the District would need some type of written commitment from the Town of Sultan prior to the District expending money to develop forestry, water quality, and wildlife mitigation plans on the Town's property. The District presented to the Town Council an outline of the major elements for consideration in a co-agreement between the District and the Town of Sultan for using the Cascade Creek Watershed in the Wildlife Mitigation Plan.

The Sultan Town Council indicated that they would like to hold a workshop to obtain more information and discuss in detail, wildlife mitigation planning for the Cascade Creek Watershed. They requested information about the previous wildlife plan that had been proposed by the District and the reasons why the Forest Service did not approve of it. They also wanted an example of how detailed the Wildlife Mitigation Plan might be. It was arranged for the District and the Town Council to hold a workshop on June 30, 1986.

KLB:jk

189U

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
 JACKSON PROJECT - FERC NO. 2157
 LICENSE ARTICLE 53
 TERRESTRIAL RESOURCES MITIGATIVE PLAN
 PUBLIC WORKSHOP SUMMARY

DATE: June 30, 1986
 PLACE: Sultan Town Hall
 ATTENDEES: Larry Koehler, Town Mayor; Town Council members: Don Newquist, John Connolly, Tony Wilde, and Fred Young; Laura Koenig, Town Clerk; Dwight Hanson, Sultan Sportsmen's Club and Historical Society.
 PURPOSE: To provide the Sultan Town Council with background information on the mitigation planning process, and an understanding of the implications of using the Cascade Creek Watershed as part as the Wildlife Mitigation Plan so that the Town Council could make a decision on whether they wish to have the District continue to investigate the feasibility of using the Cascade Creek Watershed as part of the District's Wildlife Mitigation Plan.

K. Bedrossian of the District explained to the Town Council that the District was required by the Federal Energy Regulatory Commission (FERC) to prepare a Wildlife Mitigation Plan to offset the losses resulting from the Jackson Hydroelectric Project. As part of that plan, the District was considering the feasibility of using the Town's Cascade Creek Watershed as part of that plan. The Cascade Creek Watershed was desirable for use in the mitigation plan because it is in the Sultan Basin, contains habitat somewhat similar to that which was lost as a result of the Project, and from first inspection, appears to have good mitigation potential.

K. Bedrossian provided the Town Council with an overview of the Wildlife Mitigation Plan. A draft outline of the mitigation plan report was presented to the Town Council and explained. Portions of the Skookumchuck Wildlife Habitat Management Plan was presented to the Town Council as an example of the detail that would be included in the overall wildlife mitigation plan. Also, portions of the prototype unit stand evaluation prepared by the forestry consultant was presented to the Town Council.

K. Bedrossian provided the Town Council with a draft Memorandum of Understanding between the District and the Town of Sultan regarding the Jackson Project Wildlife Mitigation Plan. K. Bedrossian stressed that this was a staff level draft and that it was essentially a first-cut or starting ground for developing an agreement with the Town of Sultan. K. Bedrossian allowed the Town Council to read through the draft MOU and then presented highlights of the MOU on an ease) and provided a handout of same (see attached). K. Bedrossian pointed out two factors that the Town should consider when determining the acceptability of the MOU; (1) the loss of flexibility in managing the watershed, and (2) the potential lost opportunity cost from timber harvest. Benefits of an agreement between the District and the Town of Sultan were also provided and include, (1) the Town of Sultan would obtain a long-term watershed management plan, (2) the Plan would provide water quality protection and would meet regulatory requirements, (3) the Town

190U

MEMORANDUM OF UNDERSTANDING HIGHLIGHTS

SUBJECT	PUD	TOWN	NOTES	BENEFITS
1. Develop Plan	X		Plan includes wildlife mit., timber plan, water quality constraints. Plan acceptable to agencies & FERC. PUD will coordinate with Town.	Protection of water quality. long-term mgmt. of town lands for timber & wildlife (50 - 100 year plan).
2. Town Cooperation		X	Town cooperation in plan development & implementation. If Town finds Plan acceptable, Town will commit to plan.	Assurance that Plan will be acceptable to PUD & Town.
3. Water Quality, Timber Management, Access	X	X	Water Quality highest priority. Timber mgmt. wildlife. Public access policy addressed.	See #1
4. Identify Problems	X	X	Notify other party of problems - immediately.	See #2
5. PUD Prepare Plan	X			Town obtains Plan at no cost.
Town Agree to Plan		X	Acceptance based on criteria in #3.	PUD meets part of mitigation obligation.
PUD Implement Plan	X		PUD provides forester to set up and manage logging contract. Town funds logging contract with timber sale revenues.	Town obtains management of harvest at no cost.
6. Plan Amendments	X	X	In conjunction with monitoring program. Criteria apply as above.	Maintain realistic flexibility of plan.

1350

Page 7 of 9

July 30, 1986

Public Workshop Summary

-2-

would obtain timber management including a timber appraisal and harvest schedule which would assist in projection of revenues and budgeting, and would obtain a forester to manage implementation of timber harvest, and (4) Sultan would obtain wildlife enhancement on their watershed. A tentative schedule was also provided.

All present listened to the presentation, read through the materials presented, and asked questions. The Mayor and the Council members all stated that they were not interested in our proposal because of the following concerns:

1. The PUD would get "too much" and the Town of Sultan would not gain enough.
2. The purpose of the watershed is to generate revenue to benefit the Town of Sultan. The District's plan would "tie" them "down too tight". The Town Council wants flexibility to log when they need revenues.
3. The Council members agree with the concept but do not want to commit to the plan at the cost of revenues. They would want a way out of the MOU.
4. The Council members feel strongly about limiting or even eliminating public access in the watershed and felt that by cooperating with this plan, they would be encouraging public use of the watershed.
5. The Town Council does not have the financial resources if the District and the Town of Sultan were to get into litigation over the MOU.

K. Bedrossian asked the Council members what would make this type of arrangement acceptable to them. After some thought, the Mayor repeated that they were not interested.

As a result of this meeting, the District will no longer be considering the Cascade Creek Watershed as part of the mitigation plan.

KLB:jk

Page 8 of 9

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
 JACKSON PROJECT - FERC NO. 2157
 LICENSE ARTICLE 53
 TERRESTRIAL RESOURCES MITIGATION PLAN
 PUBLIC MEETING SUMMARY

DATE: July 1, 1986
 PLACE: Sultan Grange
 ATTENDEES: See attached list.
 PURPOSE: K. Bedrossian was requested by Hank Sincock of the Sultan Sportsmen's Club to give a presentation to the Club to inform them of the wildlife mitigation planning activity that the District is initiating to offset the impacts resulting from the Jackson Hydroelectric Project and to provide the Sportsmen's Club with an opportunity to comment or to share information.

K. Bedrossian of the District gave a 20-minute presentation, including slides, covering project description and history, and the Federal Energy Regulatory Commission (FERC) requirements for the mitigation plan. Selection of the consultants to provide technical assistance was described and consultation and coordination with the key government agencies (U.S. Fish & Wildlife Service, U.S. Forest Service, Washington Dept. of Game, and Tulalip Tribes) were discussed. Habitat management examples were provided to give the club members a general idea of what types of measures are being considered for the wildlife mitigation program. Measures discussed included wildlife/forestry management, development and management of wetlands, seeding and fertilization, and nest boxes. Habitat Evaluation Procedures, the systematic method that will be used by the District to assist in evaluation of the mitigation measures was described. A summary was provided of the consultant's contract Scope of Work. Seven core activities in the Scope of Work, the products resulting from those activities, and estimated completion dates were provided. The target date for completion of the Wildlife Mitigation Plan is mid-August, 1987.

The meeting was opened for public comment. Major concerns centered around public access. When told that the U.S. Forest Service wanted to exchange out of the Basin, concern was expressed that the District and the City of Everett would close Spada Lake to public access if they obtained the federal Government land. Individuals at the meeting expressed that they would like to review our reports and want input throughout the planning process. The District indicated that they would hold another public meeting once draft mitigation plans were developed.

The sportsmen were particularly interested in the Recreation Plan. They requested that the District give them a presentation on the Plan and answer questions. They will be contacting R. Metzgar in the near future to set up such a meeting.

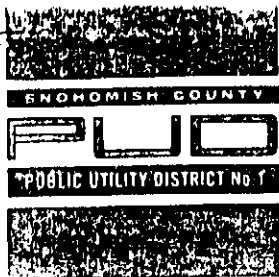
KLB:jk

191U

ATTENDANCE LIST

NAME	ORGANIZATION	ADDRESS	PHONE NO.
Royce Barbara Hunter	WISC	8164 NE 155th St. Belfell WA 98011	288-1527
Bill Minger		11422 325 SE SULTAN	793-0053
Ernest Adams		11422 325 SE SULTAN	793-2906
Theresa Adams	Sultan Sportsmen's Club	Box 64 Sultan 13910 Kellogg Lake Rd, SW	793-0924
Glenn Nancy Eaton	"	Box 64 Sultan 13910 Kellogg Lake Rd, SW	793-1837
Earl Bowen	"	P.O. Box 777 Sultan, Wa. 98284	793-1461
Bob Willbraut	"	3570 Main St Sultan, Wash	793-1861
Walter Meyer	"	Box 115 SULTAN, WA 98283	793-0525
Paul Wilson	"	2110 SULTAN	793-2953
David Shelton	"	1371 Kellogg Blvd SULTAN	793-0577
Ray Gustafson	"	P.O. Box 750 SULTAN	793-2588

E-53



2320 California St. Everett, Washington 98201 258 8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

August 20, 1986
PUD-17024

Mr. Gary Engman
Washington State Department of Game
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
Wildlife Mitigation Plan - Consultation - Agency Comments

The District has not received your comments on: 1) Prototype Mitigation Plan; 2) the outline of specific procedures for updating the impact HEP and performing the mitigation HEP; 3) the Lost Lake tract development assessment; or 4) other comments regarding the meeting held on July 15, 1986 and letters from the District dated July 17th and August 6th. This is a reminder that agency comments, if any, would be provided to the District by August 19th. At this time, written comments have been received from the U.S. Forest Service and verbal comments from the Tulalip Tribes.

The Federal Energy Regulatory Commission Order issued on August 22, 1984 (28 FERC ¶ 62,249) requiring a License Article 53 revised terrestrial resources mitigative plan directs the Licensee to consult with you. We have conferred with you about both the plan and planning process and we agree about the importance and mutually advantage to consult at strategic points during plan development, even if there were no regulatory obligation to do so. Decisions, assumptions and commitments made now pre-determine to a large extent the outcome or results later. Hence, the mutual recognition about the cruciality of effective consultation. However, the Licensee is and will further experience difficulty with effectively administering the field work and other tasks related to plan development if we do not receive a cooperative commitment from you to adhere as closely as possible to the previously agreed work schedule in terms of providing your comments and guidance to the District.

Please recall, it was agreed at the July 15th meeting that agency comments would be provided to the District by August 19, 1986. The comment period was extended 14 days beyond the 21 days agreed to during our contract scoping process (conference call minutes dated March 19, 1986). As a result of this delay, work is two weeks behind schedule and will continue to fall further behind until decisions are made regarding the above-mentioned topics, since further progress on the Mitigation Plan is contingent on these decisions.

136T

Mr. Engman, Mr. Somers,
Mr. Ging

-2-

August 20, 1986
PUD-17024

Therefore, unless we hear from you by August 26, 1986, we presume your concurrence with the District's proposed procedures as presented at the July 15th meeting and in the July 17th and August 6th letters.

Any suggestions which you might have to facilitate your role in the planning process, please advise the District.

Very truly yours,

ORIGINAL SIGNED BY R. G. METZGAR *for CCG*
L. Chet Grimes
Manager, Generating Resources

RGM/KLB:jk

cc: Marsha Kearney, USFS
James Bartelme, USFS
Dave Somers, Tulalip Tribes
J. Hunter, FERC
Q. Edson, FERC

136T

E-54

BEAK CONSULTANTS INCORPORATED

11911 N.E. First Street
Suite 303
Bellevue, Washington 98005
Telephone 206/451-3628



03 September 1986

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2025 Parkmont Lane S.W.
Olympia, WA 98502

Mr. James Bartelme
U.S. Forest Service
Mt. Baker-Snoqualmie
National Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen,

Jackson Project (FERC No. 2157)
Habitat Suitability Index Models

On behalf of Snohomish County Public Utility District No. 1 (District), Beak is pleased to enclose for your review copies of the HSI models we have prepared for use in the upcoming HEP of the Jackson Project mitigation lands. These models are based upon the models used in the 1982 HEP conducted by the Washington Department of Game (WDG), supplemented with information from published U.S. Fish & Wildlife Service (USF&WS) models, unpublished models used by Beak, WDG and USF&WS on the North Fork Snoqualmie River and recent publications such as the West Side manual by Brown et. al. We have included the 1982 HEP models as appendices to our new models so that you can compare the two.

The models will be used by Beak and the District to conduct a qualitative HEP of the mitigations lands beginning in late September. In keeping with the 1982 HEP, this assessment will rely on habitat quality as determined by the descriptive information provided in the models. Quantitative information will be used in some instances (i.e. number of snags per acre) but most of the assessment will be based upon visual qualitative assessments. This approach was chosen because it allows us to assess more land in the time allotted and because quantitative information on species habitat requirements is limited and of debatable reliability in most cases. As I mentioned, we will be using quantitative variables in those instances where we believe it will provide a reliable measure of habitat suitability. Habitat suitability curves and equations have been attached to the models for reference, but they will not be relied upon directly during the HEP process.

I am enclosing models for all of the evaluation species except the black-tailed deer, which is forthcoming. The abundance of information concerning this species and the conflicting nature of much of it has required us to take additional time in the preparation of the model. It should be available to you within a week.

If you have any questions or comments concerning the models, please feel free to contact me at 451-3628. Please direct any formal comments you may have to Karen Bedrossian at the District.

Sincerely,

BEAK CONSULTANTS INCORPORATED

Martin E. Vaughn
Martin E. Vaughn
Project Manager D3105

cc: Karen Bedrossian, PUD
Clair Oliver, City of Everett

MEV/san

E-55

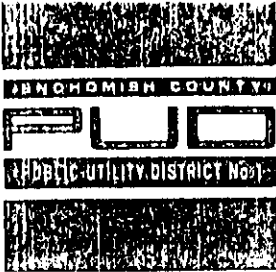
JACKSON PROJECT TERRESTRIAL RESOURCE MITIGATION PLAN
 HABITAT SUITABILITY INDICES (HSI'S) FOR UPDATE OF 1982 HEP

EVALUATION SPECIES

COVER TYPE	Mallard	Common Merganser	Osprey	Ruffed Grouse	Bl.-Cap. Chickadee	Pileated Woodpecker	Douglas Squirrel	Beaver	Pine Marten	Bl.-Tailed Deer
Mature Con.	--	--	0.50'	0.40	0.60'	0.40"	0.80	--	0.60'	0.55"
Old Growth	--	--	0.60'	0.40	0.70	0.90"	0.80'	--	0.78"	0.76"
Young Rip.	0.54	0.30'	0.30'	0.57"	0.62	0.40'	--	0.78'	--	0.70"
Mature Rip.	0.10'	0.80'	0.80'	0.70"	0.80'	0.80	0.30	--	0.60'	0.70"
Mixed For.	--	--	--	0.43	0.48"	0.28	0.25	-	0.40'	0.69"
Wetland	0.70'	0.10	0.20'	0.50"	0.62	0.53"	-	0.78"		0.78"
River/Str.	0.20'	0.61"	0.70'	--	--	--	--	0.27"	--	--
Reservoir	0.50'	0.40'	0.90'	--	--	--	--	0.30	--	--

HSI values derived from HEP study done by WDG, USFWS, and BEAK on North Fork Snoqualmie River, unless otherwise noted.

* HSI values derived from 1982 HEP for Jackson Project
 * HSI values derived by BEAK from Literature and/or experience



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

September 4, 1986
 PUD - 17047

Mr. Gary Engman
 Washington State Dept. of Game
 16018 Mill Creek Blvd.
 Bothell, WA 98012

Mr. Dave Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. Gwill Ging
 U. S. Fish & Wildlife
 2625 Parkmont Lane S. W.
 Olympia, WA 98502

Mr. James Bartelme
 U. S. Forest Service
 Mt. Baker-Snoqualmie Nat'l. Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157 - License Article 53
Revised Terrestrial Wildlife Mitigation Plan - Extension Granted

This is to advise you that the District and City of Everett have been granted a one-year time extension for preparing a revised terrestrial resources mitigative plan. The extended deadline is now August 22, 1987. A copy of the Order (2157-020) received from the Federal Energy Regulatory Commission is attached for your file records.

Very truly yours,

Original Signed By
 R. K. SCHNEIDER

R. K. Schneider
 Director, Power Management

RM:lo
 Attachment

01601

UNITED STATES OF AMERICA
 FEDERAL ENERGY REGULATORY COMMISSION

Public Utility District No. 1
 of Snohomish County and the City
 of Everett, Washington

Project No. 2157-020

ORDER GRANTING EXTENSION OF TIME
 (August 15, 1986)

On July 28, 1986, the licensee for the Henry M. Jackson Project requested a 1-year extension of the August 22, 1986, deadline for submission of a revised terrestrial resources mitigative plan pursuant to license article 53. The reasons advanced by the licensee in support of the requested extension of time are reasonable and justify a 1-year extension.

The Director orders:

(A) The deadline for submission of a revised terrestrial resources mitigative plan pursuant to license article 53 is extended to August 22, 1987.

(B) This order is issued under authority delegated to the Director and is final unless appealed to the Commission under Rule 1902 within 30 days from the date of this order.

Richard T. Hunt

Richard T. Hunt
 Director, Office of
 Hydropower Licensing

DC-A-30



WASHINGTON STATE DEPARTMENT OF
Natural Resources

Ph: (206) 856-0083

PNP 16-3-7
(17056)

LEWIS HOYLE
Commissioner of State Lands

Northwest Area
919 N. Township St
Central Wenatchee WA 98284

September 8, 1986

17056

L. Chet Grimes
Snohomish County PUD
P. O. Box 1107
Everett, Washington 98206

RE: Jackson Project - State Lands Terrestrial Wildlife Mitigation Plan

Dear Mr. Grimes:

This letter is a follow up to my phone message to Karen Bedrossian a couple of weeks ago. I confirmed your proposed cruise methods outlined in your August 6, 1986 letter to me.

After it is completed, please send me a copy of your cruise. We will check your cruise and perform our own appraisal. We can then get together to compare appraisals, and discuss management options.

Sincerely,

William J. Wallace
Assistant Area Manager

HJW:ts

cc: Joe Potter
Don Farwell

OLV:ts218, Misc#4

JACKSON PROJECT

SEP 10 1986

	INITIALS	COPY
R. Schmitt		1
C. Grinn		
N. Johnson		
R. Metzger		
C. Lang		
D. Miles		
K. Bedrossian		1

E-58

BEAK CONSULTANTS INCORPORATED

11911 N.E. First Street
Suite 303
Bellevue, Washington 98005
Telephone 206/451-3828



17077

19 September 1985

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. James Bartelme
U.S. Forest Service
National Forest
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project (PERC No. 2157)
Habitat Suitability Index Models

On behalf of Snohomish County Public Utility District No. 1 (District), Beak is pleased to enclose for your review a copy of the HSI model we have prepared for the black-tailed deer for use in the upcoming HEP of the Jackson Project mitigation lands. This model is based on our current understanding of deer habitat utilization in the western Cascades. We have included the 1982 HEP model as an appendix to our new model so that you can compare the two.

As with the models I sent you earlier, this will be used by Beak and the District to conduct a qualitative HEP of the mitigations lands beginning in late September. In keeping with the 1983 HEP, this assessment will rely on habitat quality as determined by the descriptive information provided in the model. Quantitative information will be used in some instances, but most of the assessment will be based upon visual qualitative assessments. This approach was chosen because it allows us to assess more land in the time allotted and because quantitative information on species habitat requirements is limited and of debatable reliability in most cases. As I mentioned, we will be using quantitative variables in those instances where we believe it will provide a reliable measure of habitat suitability. Habitat suitability curves and equations have been attached to the models for reference, but they will not be relied upon directly during the HEP process.

SEP 22 1985	Copy																		
	Orig.																		
		Schreiner	Grimm	Johnson	McIntyre	Lilly	Wiles	Beak/contract											

If you have any questions or comments concerning the model, please feel free to contact me at 451-3628. Please direct any formal comments you may have to Karen Bedrossian at the District.

Sincerely,

BEAK CONSULTANTS INCORPORATED

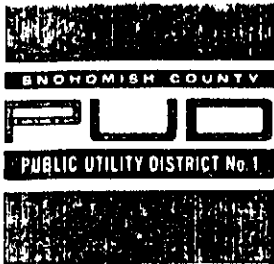
Marty Vaughn
Martin E. Vaughn
Project Manager D3105

cc: Karen Bedrossian, PUD
Clair Olivers, City of Everett

MEV/san

(Note: enclosure omitted from Appendix E)

E-59



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

October 10, 1986
 PUD-17063

Mr. David Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. James Bartelme
 District Ranger
 U. S. Forest Service
 Mt. Baker-Snoqualmie Nat'l Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
 Wildlife Mitigation Plan
 Meeting and Phone Conference Records

Enclosed is a summary of a meeting and a phone conference conducted on September 3 and 10 respectively, between Gary Engman, WDG; Gwill Ging, USFWS; Marty Vaughn, Beak Consultants; and Karen Bedrossian, District. The meeting and conference call were conducted because Engman and Ging had requested additional information and discussion regarding the HEP study area and annualization parameters during their review and comment on the July 15 meeting records. The most significant result of these conversations was the compromise agreement to use the HEP study area and annualization parameters as stated in the July 15, 1986 meeting minutes, with the exception of changing the cutting rate from 4% per year to 2% per year (page 9(a) of July 15, 1986 meeting record) in lieu of further consideration of the USFS clearcutting in the non-inundated zone. This is a compromise package in the interest of resolving a difficult issue. As a result of this decision, we can proceed with the updating of the impact HEP.

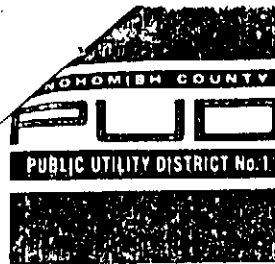
If you have questions or comments on the meeting and conference call records, please notify Karen Bedrossian (347-4374) by October 20, 1986.

Very truly yours,
 Original Signed By
 L. C. GRIMES
 L. Chet Grimes
 Manager, Generating Resources

Enclosure
 RGM:jk

cc: Clair Olivers, City of Everett (with attachment)
 Gary Engman, WDG (w/o attachment)
 Gwill Ging, USFWS (w/o attachment)

275U



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

October 10, 1986
 PUD-17062

Mr. Gary Engman
 Washington State Dept. of Game
 16018 Mill Creek Blvd.
 Mill Creek, WA 98012

Mr. Gwill Ging
 U.S. Fish & Wildlife
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
 Wildlife Mitigation Plan
 Meeting and Phone Conference Records

Enclosed is a summary of the meeting and phone conference conducted on September 3 and 10 respectively, between G. Engman, G. Ging, M. Vaughn, and K. Bedrossian. If your notes or recollections differ from ours, please notify K. Bedrossian (347-4374) prior to October 20, 1986.

The most significant result of these conversations was the compromise agreement to use the HEP study area and annualization parameters as stated in the July 15, 1986, meeting minutes, with the exception of changing the cutting rate from 4% per year to 2% per year (page 9(a) of July 15 record) in lieu of further consideration of the USFS clearcutting in the non-inundated zone. It was agreed that this is a compromise package in the interest of resolving a difficult issue. As a result of this decision, we will proceed with the updating of the impact HEP.

Very truly yours,

Original Signed By
 L. C. GRIMES
 L. Chet Grimes
 Manager, Generating Resources

Enclosure
 KLB:jk

cc: J. Bartelme (w/o enclosure)
 D. Somers (w/o enclosure)
 C. Olivers, City of Everett (w/o enclosure)

276U

E-60

Jackson Project - FERC No. 2157
License Article 53
Terrestrial Wildlife Mitigation Plan

Meeting Minutes

Dates: September 3, 1986 (Meeting), September 10, 1986 (Telephone Conference)

Attendees: Gary Engman, Washington Department of Game (WDG); Gwill Ging, U.S. Fish & Wildlife Service (USF&WS); Karen Bedrossian, Snohomish Co. PUD (District); and Marty Vaughn, Beak Consultants, Inc. (Beak)

Purpose: Discuss the update of the 1982 HEP for the lands impacted by the project and obtain agency concurrence on key assumptions, including the study area, HSI values and logging rates that would have occurred if the project had not been built ("without project assumptions").

Note: The following minutes are presented by topic rather than chronologically for purposes of clarity. Discussions from both September 3 and September 10 are combined under each topic.

Study Area

- A. **Background:** The WDG and USF&WS believe that the District is responsible for the loss of old-growth forest habitat on the 1,804 acres now occupied by Spada Reservoir, as well as on acres above the reservoir that were logged by USFS prior to the construction of Stage I. The District has agreed to include the 1,804 acres of the inundated zone, but not lands above the reservoir. The District maintains that the Forest Service logged above the reservoir for purposes other than the project. At the July 15, 1986 agency meeting, J. Bartelme of the Forest Service presented a map showing "cut-dates" for timber sales in the Sultan Basin, including the reservoir area. He stated that several of the sales were planned and cut prior to the construction of the project and believed that the District should not be responsible for the loss of old-growth habitat on these acres. Bartelme suggested that all sales cut prior to 1961 were not the responsibility of the District.
- B. **Meeting Minutes:** The District reviewed its boundary proposal (see July 15, 1986 meeting records) of 750 acres under Stage I (1965) and 1,972 acres under Stage II (beginning in 1985). The Stage II acreage breaks down as follows:

Stage I reservoir - 750 acres
Stage II addition to reservoir - 1,054 acres
Non-inundated areas (powerhouse, r-o-w's, etc.) - 168 acres

The WDG and USF&WS both responded that they believed the District to be responsible for at least part of the large clearcut beyond the reservoir. They stated that the study area presented by the District did not account for that loss of habitat. The USF&WS suggested a compromise that would, in their opinion, indirectly address the loss of wildlife habitat above the inundation zone. The USF&WS proposed that the study area be as proposed by the District, but that the assumed rate of old-growth cutting without the project (see Item II) be changed from 4% per year to 2% per year. Between the September 3 meeting and the September 10 conference call, the District, WDG and USF&WS consulted with their respective managements on this proposal. On September 10, all agreed to accept the compromise proposal. Specifically, the study area will be as proposed above by the District and the rate of cutting of old-growth without the project will be assumed to have been 2% per year. The USF&WS cautioned against losing sight of the fact that this is a compromise package in the interest of resolving a complicated issue so that we can update the original HEP, and continue progress on the mitigation plan. The WDG expressed a desire to avoid compromises that would confuse the issue, but agreed to this compromise in the interest of keeping the mitigation project moving ahead.

i. Without-Project Assumptions

- A. Logging Rates: The rate at which old-growth timber in the Stage I and Stage II inundation zones would have been cut without the influence of the project has been a topic of discussion since the original HEP was performed in 1982. The HDG assumed 1% per year in the 1982 HEP. The District assumed that all would have been cut by 1965 in the Exhibit S report. The USF&WS has variably suggested 1% to 3% and a rate similar to the logging that has been done below Culmback Dam. All commercial timber on Forest Service land (except for steep slope areas) along the Sultan River below Culmback Dam was cut between 1960 and 1985. This translates to 4% per year. The District proposed that a similar rate be used for the inundated areas. As part of the compromise on the study area, however, all parties agreed as part of the package compromise to the assumption that all commercial timber (old-growth, mature and mature riparian) in the inundation zone would have been cut at 2% per year if it had not been logged for the project. The term "commercial timber" excludes streamside buffers and unstable soils. These areas are discussed below. Beak's preliminary estimate of the acreages of commercial timber in the 1,804-acre inundation zone as of 1960 are: old-growth, 822 acres; mature conifer, 112 acres and mature riparian, 167 acres. The remaining 703 acres are made up of wetlands, river and stream, streamside buffers and young (pre-commercial) timber. These estimates are based on hand-drawn maps provided by the Forest Service and will be refined if aerial photos from the early 1960's can be obtained. All parties also agreed that second-growth commercial forest would be managed on a 60-year rotation and cut every 65 years in the without-project HEP run.
- B. Previously-Logged Lands: The map provided by the Forest Service shows approximately 327 acres of the 1,804 acre inundation area as logged by 1959. All parties agreed that these areas were probably cut without the influence of the project, or at least they were not made larger because of the anticipated need to cut for the project. Again, this acreage is based upon hand-drawn maps and will be refined if aerial photos or detailed maps can be obtained.
- C. Set-aside lands: All parties agreed to the District's proposal that 5% of the inundation zone would never have been cut without the project because of steep slopes and/or unstable soils. This is an estimate based on Forest Service experience in the basin and the topography within the inundation zone. Everyone also agreed that a buffer strip would have been left along the Sultan River and its major tributaries, and that selective cutting within this strip would have translated to habitat loss of roughly 1% per year. Beak estimated the area of the buffer to be 150 feet wide (75 feet on either side of the river) by 9 miles long, or 164 acres.

- D. Habitat Suitability Indices (HSI): In the update of the 1982 HEP, the original HSI scores will be used whenever they are available. No field work will be done because the lands in question are now flooded by the reservoir. Unfortunately, the 1982 HEP did not provide HSI scores for all evaluation species in all cover types. HSI scores were proposed for the missing values based upon work in similar areas (North Fork Snoqualmie River), the literature (including published HEP models) and discussions with species experts. The proposed scores were provided in a table at the September 3 meeting. Discussions at the September 3 meeting, and again on September 10, resulted in a revised final table (copy attached). Appendix A provides an explanation for all (HSI) values that were changed from the September 3 table. These values will now be used in the update of the 1982 HEP.
- E. Wood Models: Wood models were prepared to be used in the upcoming HEP on the mitigation lands. They were presented to the agencies at the September 3 meeting. During the September 10 conference call, all parties agreed the models were appropriate and that they should be used for mitigation planning. (Note: The black-tailed deer model was distributed at a later date. The previous discussion covers only the other 9 models. The black-tailed deer model was considered acceptable after it was reviewed by G. Engman and G. Ging.)
- F. HEP field Data Collection: Earlier in the summer it was proposed that the HDG, USF&WS, USFS and Tulalip Tribes visit the mitigation lands during the HEP field data collection by Beak and the District in order to assess methods and evaluate results. Since that time, all of the agency personnel have experienced scheduling difficulties, and cannot attend the field trip in late September or early October. All parties involved in the September 10 conference call agreed that the data collection should proceed as scheduled (September 22 - October 10), and that the agencies will attend if they can. If they cannot attend, the agencies are willing to accept the data collected by Beak and the District. (Note: G. Ging and G. Engman attended a meeting on October 9, conducted by the District to review the HEP data collection process. Both individuals considered the process and ratings reviewed to be acceptable.)

Attachments
Appendix A
HSI Table

E-62

Appendix A

Explanations for Changes in HSI Table

- Mallard:** All parties agreed that 0.50 is too high for the entire reservoir, but realized that only considering part of the reservoir (i.e. shoreline) would be arbitrary and would complicate the HEP. All agreed to assign a value of 0.15 and use the entire reservoir. This will account for summer brood rearing along the shoreline and fall, winter, spring resting on the entire reservoir.
- Osprey:** The value for Young Riparian was a typographical error. It should have read 0.00 and was changed accordingly. The value for Mature Riparian was lowered to 0.50 when an examination of the 1982 HOG report showed that this cover type was dominated by alder. All parties agreed that the values for River/Stream and Reservoir should be decreased from 0.7 and 0.9 to 0.5 and 0.7 respectively.
- Beaver:** A footnote was added to explain that the reservoir value for beaver applies to the 656 feet along the shoreline only.

JACKSON PROJECT TERRESTRIAL RESOURCE MITIGATION PLAN
HABITAT SUITABILITY INDICES (HSI'S) FOR UPDATE OF 1982 HEP

EVALUATION SPECIES

COVER TYPE	Mallard	Common Merganser	Osprey	Ruffed Grouse	Bl.-Cap. Chickadee	Pileated Woodpecker	Douglas Squirrel	Beaver	Pine Marten	Black-tailed Deer
Mature Con.	--	--	0.50'	0.40	0.60'	0.40"	0.80"	--	0.60'	0.55"
Old Growth	--	--	0.60'	0.40	0.70'	0.90"	0.80'	--	0.70"	0.70"
Young Rip.	0.54	0.30'	--	0.57"	0.62	0.40'	--	0.70'	--	0.70"
Mature Rip.	0.10'	0.80'	0.50'	0.70"	0.80'	0.80	0.30	0.50'	0.60'	0.70"
Mixed For.	--	--	--	0.43	0.48"	0.28	0.25	--	0.10'	0.69"
Wetland	0.70'	0.10	0.20'	0.50"	0.62	0.53"	--	0.70"	--	0.78"
River/Str.	0.20'	0.61"	0.50'	--	--	--	--	0.27"	--	--
Reservoir	0.15'	0.40'	0.70'	--	--	--	--	0.30"	--	--

HSI values derived from HEP study done by WDG, USFWS, and BEAK on North Fork Snoqualmie River, unless otherwise noted.

HSI values derived from 1982 HEP for Jackson Project
HSI values derived by BEAK from literature and/or experience
Beaver use of reservoirs is limited to within 656 ft. of shore

BEAK CONSULTANTS INCORPORATED

11911 N.E. First Street
Suite 303
Bellevue, Washington 98005
Telephone 206/451-3628



19 February 1987

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Maryeville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. Roger Williams
U.S. Forest Service
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project (FERC No. 2157)
Draft Wildlife Habitat Management Plan

E-04
I am pleased to enclose copies of the subject document on behalf of Snohomish County Public Utility District No. 1. This draft is provided for your review and comment prior to finalization of the management program. As discussed between Karen Bedrossian and yourselves, we will need your comments by March 23 in order to stay on schedule with the plan.

This first draft of the management plan is based on discussions that Beak and the District have had with the agencies, and we trust that it addresses all or your concerns and priorities. We have concentrated on lands in the vicinity of the Project, and we have tried to present a plan that is technically feasible and accurate. We have emphasized management for the four priority habitats you identified (old-growth, wetlands and young and mature riparian) and we have utilized the HEP process to document habitat gains and losses. We are very confident that you will be encouraged by the progress that has been made. Nevertheless, we realize that there is still a lot to be done and a lot we need to discuss. To that end, Karen has scheduled two meetings; one on March 6 to present the plan and HEP report and one on March 17 to serve as a follow-up after you have reviewed both documents in detail. (The HEP report is still in preparation and will be sent to you shortly). Both meetings will be at 9:00 AM in the Beak office in Bellevue (map enclosed). I hope that you have time to look through the plan prior to our first meeting. Its probably not critical that you read all the detailed management prescriptions, but you will want to review the background and approach sections so that we can discuss them when we meet.

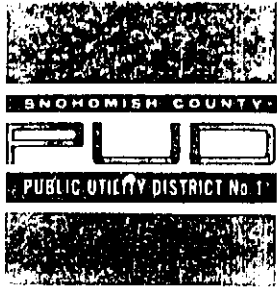
I look forward to meeting with you to discuss the plan further. In the meantime, please don't hesitate to call Karen or myself if you have any questions.

Sincerely,

Marty Vaughn
Martin Vaughn
Project Manager

enclosure

c.c. Roy Metzgar, District
Karen Bedrossian, District
Clair Olivers, City of Everett
Marcia Kearney, USFS North Bend
Don Farwell, DNR



2320 California St., Everett, Washington 98201
Mailing Address: P. O. Box 1107, Everett, Washington 98206

March 5, 1987
PUD-17284

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. Roger Williams
U.S. Forest Service
Skykomish Ranger District
Skykomish, WA 98286

Re: Item:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan

Attached are copies of the draft results of the Habitat Evaluation Procedures (HEP) analyses. The results are reported separately for the update of the impact HEP and the mitigation HEP. Within each HEP, we have included acreage summaries, proposed Habitat Suitability Index (HSI) values and Habitat Unit (HU) Summaries. We have also included a compensation analysis which compares Average Annual Habitat Units (AAHU) for the impact and mitigation analyses. We are currently in the process of preparing the full HEP report which will include the assumptions and methods which you approved previously. We are providing the results in advance of the full report so that you may review the data and compare it to the management plan.

You are reminded of the meeting scheduled for March 17, 1987, at 9:00 a.m. at Beak to discuss comments and questions pertaining to the Draft Wildlife Habitat Management Plan and the HEP analysis. We would like to receive written comments from you by March 23, 1987. Please respond specifically to the following points:

- 1) Approach of the Management Plan;
- 2) Statement of objectives and agency priorities (Chapter 2). Have we accurately stated your positions?;
- 3) Technical merit of proposed management measures;
- 4) Acceptability of proposed mitigation lands;

-2-

March 5, 1987
PUD-17284

- 5) Proposed HSI values for the mitigation HEP; and
- 6) Appropriateness of assigning HU credit to management measures not included in the HEP.

We are requesting your comments so that we may move on to the next phase of mitigation planning (cost estimates, presentations to Commissioners, City Council and public) with the assurance that what we have accomplished to date has your concurrence.

Very truly yours,

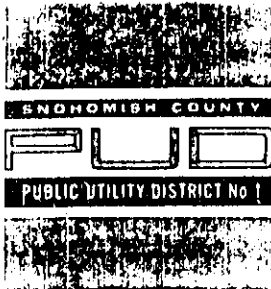
Original Signed By
L. Chet Grimes

L. Chet Grimes
Manager, Generating Resources

Enclosure
KLB:jk

cc: C. Olivers, City of Everett
M. Kearney, USFS North Bend

5300



2320 California St. Everett, WA 98201
Mailing Address: P.O. Box 1107 Everett, Washington 98200

March 11, 1987
PUD-17291

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Bothell, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. Roger Williams
U.S. Forest Service
Skykomish Ranger District
Skykomish, WA 98288

Re: Settlement:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Agency Meeting Summary

Enclosed is a summary of the meeting conducted by the District on March 6, 1987, to assist the resource agencies in their review of the Draft Wildlife Habitat Management Plan and the HEP Analyses.

If you have any further comments about the meeting or this meeting summary, please advise Karen Bedrossian with your written response to the Draft Plan and HEP analysis due March 23 or by March 27, 1987. I hope this meeting summary will help you in your review.

Very truly yours,

ORIGINAL SIGNED BY R. G. METZGER for LCG

L. Chet Grimes
Manager, Generating Resources

Enclosure

KLB:jk

cc: C. Olivers, City of Everett
M. Kearney, USFS North Bend

*Attachment to
District letter of*

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
JACKSON PROJECT - FERC NO. 2157
LICENSE ARTICLE 53
DRAFT WILDLIFE HABITAT MANAGEMENT PLAN

3/11/86

Page 1 of 6

Agency Meeting Summary

DATE: March 6, 1987
PLACE: Beak Consultants, Bellevue
ATTENDEES: Gary Engman, Washington Department of Game (WDG); Gwill Ging, U.S. Fish and Wildlife Service (USFWS); Roger Williams and Marsha Kearney, U.S. Forest Service; Marty Vaughn and Dave Hays, Beak Consultants; and Karen Bedrossian, District.
PURPOSE: To assist the resource agencies with their review of the Draft Wildlife Habitat Management Plan and the Habitat Evaluation Procedures (HEP) Analyses.

Introduction

This meeting originally was intended to be an all-day workshop with the resource agencies to discuss the Draft Wildlife Habitat Management Plan and the HEP analyses. Engman and Ging requested that the meeting be condensed to no more than two to three hours because of their heavy workload.

Bedrossian provided a brief report on progress since the previous agency meeting. Bedrossian requested agency comments and concurrence on the plan in writing, including the HSI values for the HEP so that the District and its consultants can proceed with the next tasks in the planning process. Tasks dependent on agency response include: cost estimates, fine-tuning the plan, and presentations to the District Commission, City Council and the public. To be able to be responsive to agency requests and suggestions, the District needs agency input at this point in the planning process.

Review of Draft Management Plan

Vaughn reviewed the major points of the Draft Wildlife Habitat Management Plan by Chapter. Chapter 2 - Objectives of the Plan were reviewed. It was requested that the agencies look at the statement of objectives and agency priorities and let the District know if agency objectives and concerns were stated accurately.

Vaughn described each of the proposed tracts of land to be used for mitigation and the summary table of acreages. Kearney requested an explanation of how old growth acreage increased from 55 acres to 272 acres. Vaughn explained that the additional acreage was actually late successional coniferous forest managed for old growth characteristics. The acreages were summarized as old growth, but another category can be added to the table if the agencies prefer to see a late successional category. It was pointed out that old growth in the 1982 HEP conducted by HDG was defined as trees over 100 years of age. The average tree age at Lake Chaplain is 135 years with dominant trees over 200 years old. Ging asked what the fate of the Lake Chaplain old growth would be without implementation of the mitigation plan? Ging was concerned that trees along Lake Chaplain would not have been cut. Bedrossian responded that the City would use a forestry plan (the Newman Plan) which calls for cutting the old growth in 2020. The planning process looked at the Newman Plan from regulatory and water quality aspects. The City and water quality consultant review indicate that the Newman Plan could be implemented. Engman asked how the Newman Plan would change under TFW? Kearney stated that TFW probably would not affect the plan much since it really just deals with riparian areas. Vaughn asked if it were agreeable to

not include TFW in our study, in order to complete the mitigation plan on schedule? Engman stated that he could not agree to that at this meeting. Engman and Ging may comment on that in writing. Bedrossian pointed out that TFW was not in effect yet; it may be some time before it is; and that it probably wouldn't make that much difference in the overall HEP scores.

Vaughn described the major elements of the plan. Ging asked about the "wedge area" and Metzgar's previous comment about creating a wetland there. Bedrossian and Vaughn explained that wetland creation there would be costly and more importantly, there is a problem with saturating the soils above the powerhouse and potential slumping. Access constraints at the Lake Chaplain Tract were discussed. Engman is concerned that hunting restrictions may impede HDG's acceptance of the plan. Bedrossian stated that the access and use policy was the same as described in the letter dated March 20, 1986, which was sent to Engman and Ging. The City's policy of discouraging beaver use in the watershed was questioned by Ging. Bedrossian responded that the City does not wish to encourage beaver use in the watershed, but will allow beaver enhancement measures in Chaplain Marsh below the watershed. The City will continue to monitor beaver activity in the watershed and take appropriate action to protect water quality if beaver use in the watershed increases. Ging requested that we get a commitment from the City that they won't take action to eliminate beaver in Chaplain Marsh and that if benefits from the mitigation area aren't realized because of water quality needs, then the City will provide mitigation elsewhere. Engman and Ging will want a measurable way to monitor beaver below Lake Chaplain. Bedrossian pointed out the City and the District would both be "signing off" on the final wildlife plan so she did not believe additional written commitments were needed. She also stated that

E-67

throughout the life of the mitigation program, adjustment may be needed if planned activities cannot be carried out for unforeseen reasons. When this occurs, the District, City and agencies will have to agree on an appropriate alternative course of action.

Bedrossian stressed that the District may not ultimately propose to include all of the mitigation measures included in the current draft. Inclusion in the final plan will depend on cost estimates and the mitigation credit attributed to a specific mitigation technique. It is important, however, that the agencies make sure all of the mitigation techniques are acceptable since they could appear in the final plan. The District needs to know at this point in planning if any measure in the draft plan is not acceptable. Kearney wanted to know if guidelines for handling a catastrophic event had been included in the draft plan? All agencies requested that guidelines be included in the next draft of the plan and that the District and City recognize that there will be a continuing responsibility and obligation to mitigate for the wildlife losses resulting from the project.

Kearney questioned the monitoring program for snags and suggested that estimating snag numbers every 25 years was not enough. Kearney and Vaughn will discuss USFS methods for monitoring snags and dead and down material to see if some of those procedures can be used in the District's Wildlife Plan. Kearney also suggested that commercial thinning at 20-30 years be considered for second growth management.

Williams asked if the transportation system for logging was thought out and if the plan is feasible in that respect? Vaughn and Hays stated that

the harvest plan was technically feasible. Williams asked how we were handling snags relative to the Department of Labor & Industry - were we including green tree units? Vaughn and Hays explained that there were green tree leave units for future snags and that these areas and existing snags will be located adjacent to buffer zones where feasible to reduce wind fall. The agencies requested that guidelines be provided explaining how slash will be treated.

Bedrossian requested that the agencies identify useful references for management techniques if they know of some that have not been included in the draft plan. It was also requested that the agencies comment on the approach of the management plan, the land proposed as mitigation tracts, and the technical merit of proposed management measures.

Review of HEP Analyses

Vaughn explained the HEP analyses report section by section. Regarding the mitigation HEP, the 1985 values were determined in the field and approved by the agencies in October. It was also explained that a 45-year mitigation plan HEP was conducted for comparison and to provide an alternative approach in case a problem develops regarding extending the mitigation plan beyond the present FERC License period of year 2011.

Kearney recommended creating brush piles for ruffed grouse after the pre-commercial thin.

E-68

Bedrossian requested agency comments on the proposed HSI values for the mitigation HEP and on assigning HU credit to management measures not included in the HEP. Also, comment was requested on "trading" HU credit for improving habitat by managing for evaluation species such as osprey, which already show an increase in HU's resulting from the project.

Upcoming Agency Participation

The next agency meeting is scheduled for March 17, 1987, at 9:00 a.m. at Beak's offices. Written comments on the Draft Wildlife Habitat Management Plan and the HEP analyses are due by March 23, 1987. Crucial topics for agency consideration were presented to the agencies in a District letter dated March 5, 1987, to help expedite their comment efforts. Bedrossian offered to conduct another field visit if the agencies think it would be helpful.

E-69

KLB: 3/6/87



United States
Department of
Agriculture

Forest
Service

Skykomish
Ranger District

P.O. Box 305
Skykomish, WA 98288

17305

Reply To: 2770

Date: March 23, 1987

L. Chet Grimes
Generating Resources Manager
Snohomish County PUD
P.O. Box 1107
Everett, WA 98206

Dear Mr. Grimes:

We have reviewed the first draft of the Wildlife Habitat Management Plan for the Henry M. Jackson Hydroelectric Project and have the following comments:

1. The plan needs built-in mechanisms to account for changes. Possible changes include new management techniques, land ownership, etc.
2. The plan needs to address catastrophic events, including wildfire, insect and disease, and windthrow. What will be done should a catastrophic event occur?
3. Monitoring guidelines should be re-evaluated. Most of the monitoring plan has to do with physical characteristics and not biological response. There should be a better mix of both.
4. The monitoring of wildlife trees every 25 years is too great of a length of time. Should consider monitoring every five years, looking at use as well as tree condition.
5. How will future land exchanges in the Sultan Basin affect the mitigation plan?

If you have any questions, please contact Marsha Keatney at 888-1421.

Sincerely,

Roger W. Williams
ROGER W. WILLIAMS
Acting District Ranger

MAR 25 1987	
	Div Cof
R. Schnelker	
C. Grimes	1
N. Johnson	
R. Metzger	
C. Lang	
D. Miles	
K. Bedrossian	1
File	1





PUBLIC UTILITY DISTRICT No. 1

2320 California St. Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107 Everett, Washington 98206

April 2, 1987
PUD-17310

Mr. Gary Engman
Washington State Dept. of Game
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Dave Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Gwill Ging
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. Roger Williams
U.S. Forest Service
Skykomish Ranger District
Skykomish, WA 98288

Gentlemen:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Agency Meeting Summary

Enclosed is a summary of the March 17, 1987 meeting conducted by the District to discuss agency concerns and assist the resource agencies in their review of the Draft Wildlife Habitat Management Plan and the HEP analyses. If you have any further comments about the meeting or the meeting summary, please advise Karen Bedrossian by April 15, 1987.

Written comments on the Draft Wildlife Habitat Management Plan and the HEP analyses were requested by March 23, 1987. We have received written comments from the U.S. Forest Service. We are expecting written comments by April 10, 1987, from the U.S. Fish and Wildlife Service and Washington Department of Game. We have not received comments from the Tulalip Tribes and would like to receive written comments from the Tribes by April 10. We will assume that you approve the Plan and HEP analyses if we do not hear from you by April 10, 1987.

Very truly yours,

Original
L. C. GRIMES

L. Chet Grimes
Manager, Generating Resources

Enclosure

KLB:jk

cc: C. Ollivers, City of Everett
M. Kearney, USFS North Bend

561U

Attachment to
District letter of
4/2/87
Page 1 of 5

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
JACKSON PROJECT - FERC NO. 2157
LICENSE ARTICLE 53
DRAFT WILDLIFE HABITAT MANAGEMENT PLAN

Agency Meeting Summary

DATE: March 17, 1987
PLACE: Beak Consultants, Bellevue
ATTENDEES: Gary Engman, Washington Department of Game (WDG); Dave Somers, Tulalip Tribes (Tribes); Marsha Kearney, U.S. Forest Service; Marty Vaughn and Dave Hays, Beak Consultants; Roy Metzgar and Karen Bedrossian, District.
PURPOSE: To assist the resource agencies with their review of the Draft Wildlife Habitat Management Plan (Plan) and the Habitat Evaluation Procedures (HEP) Analyses, and to discuss agency concerns.

The resource agency meeting conducted on March 6, 1987, was reviewed. Later in the meeting, the summary notes from March 6 were distributed. Vaughn and Bedrossian emphasized their request that the agencies respond specifically to those six points outlined in the letter dated March 5, 1987. Comments on other items of concern or portions of the Plan that the agencies consider high priority were also requested at this time in the review process.

Engman stated that he would not be able to provide comments by March 23, 1987, because of his heavy workload and other WDG personnel have not completed their review of the Plan and HEP analyses. Bedrossian requested that Engman write a letter by March 23 with comments thus far, an explanation of delays, and a target date for when comments would be prepared. Bedrossian offered to talk to the others at WDG reviewing the Plan to assist with their review and expedite comments. Engman said he would get back to Bedrossian on those matters.

561U

-1-

Engman requested an explanation in the Plan of mechanisms for fine-tuning the Plan in future years so that it will be flexible if changes are warranted. He requested a process to determine if objectives are being achieved and if not, then the program should be adjusted. It was explained that the process and mechanisms are in the program under the monitoring and reporting process. The monitoring program will be refined and further discussion can be provided in the reporting section. Bedrossian envisions agency/District meetings as requested, following annual and five year reports. Problems or adjustments in the program would be presented in the report and discussed at these meetings.

E-71
Engman expressed concern that the monitoring program as presented in the Draft Plan focused strictly on physical measurements, but should also include wildlife response to the program. Bedrossian pointed out that the District was requested to use HEP to measure impacts and the value of the Mitigation Plan. HEP is a habitat-based evaluation methodology, therefore Bedrossian did not think population studies were justified since the District agreed to use HEP. Engman stated that he did not necessarily mean population studies, but he thought observational studies reflecting use and general trends were needed. He did not think studies were necessarily needed on an annual basis. He requested that it state in the first couple of sections of the Plan that animal response will be monitored and specifics of that monitoring be presented in the monitoring chapter of the Plan.

Engman asked how the lands above 1,460' MSL at Spada reservoir fit into the Plan? Bedrossian explained that since the District does not presently control those lands and the outcome of the proposed land exchange is not certain, land above 1,460' MSL was not included in the Draft Plan. One of the problems with previous District wildlife plans, cited by the agencies and FERC, was a lack of landowner commitment. Bedrossian explained that if lands were obtained by the District, the Plan is set up so that they could be added at that time. Metzgar provided a review of the land exchange history. Somers explained that the Tribes were negotiating with the State regarding hunting rights. The Sultan Basin was a historical hunting area. The Tribes may have a problem with the USFS trading out of the basin because of hunting rights issues (open and unclaimed lands). He did not know what the extent of the problems might be but wanted to explain the issue and possible ramifications. Metzgar opined that if the Tribes and HDG could reach agreement on hunting and the general public would still be allowed recreational use in the basin, the interests and concerns of Indian hunting should then be covered as well.

Metzgar stated that he wants to know by mid-April (in written agency comments to the Draft Plan), if Lost Lake should be kept in the Mitigation Plan. The option to purchase the land is coming up again in early May. Engman said that he thought there was high recreational value at Lost Lake and HDG probably will want to keep it as part of the Plan. Engman will run it by his people again. Somers stated that he favors keeping Lost Lake in the Plan.

Engman questioned the statement in the Draft Plan (page 135) that water quality constraints at Lost Lake would be similar to Lake Chaplain. Vaughn and Bedrossian stated that constraints will be explained in more detail in the revision of the Plan and that the constraints are not as strict at Lost

Lake. Engman stated that there should not be any human use constraints at Lost Lake. It was also stated that access to Lost Lake should be addressed in the Plan.

Engman was concerned with the statement on page 57 of the Draft Report that the City does not allow hunting on the Lake Chaplain property. It was explained that the property is within City of Everett boundaries and for safety and water quality reasons, hunting is not allowed. Engman stated that WDG wants the option to regulate hunting on the Lake Chaplain property and if hunting is not allowed by the City, the tract will not be acceptable for mitigation no matter what the reason. He said that the Department is supposed to manage and protect wildlife for public use. Engman requested clarification regarding boundaries of Lake Chaplain Tract areas restricted to public use and time of day access is allowed. He requested a map showing restrictions (e.g. how far from the shoreline of Lake Chaplain is use restricted). He also requested clarification of "limited human use" (page 60, item C) in the Plan.

E-72

Engman requested clarification of point 6 in the March 5, 1987 letter. The letter requested that the agencies comment specifically on several points one of which is: "6) Appropriateness of assigning MU credit to management measures not included in the HEP". Bedrossian explained that the District would want credit (preferably in terms of HU's) for conducting mitigation measures that were not included in the HEP assessment such as waterfowl nest boxes, perch poles for raptors, and vegetation plantings and evaluations in the drawdown zone of Spada reservoir. Credit for these measures is not reflected in the HEP results. Bedrossian also pointed out that the District will want credit for enhancement measures in the mitigation plan for species showing an increase in AAHU's as a result of the project (osprey, mallard, common merganser, and beaver).

Vaughn summarized the District/Consultant field meetings conducted March 11 and 12, 1987. He explained that in lieu of expanding the Chaplain Creek Marsh wetland, expansion and development of wetlands in stand 2-1, north of Lake Chaplain was being considered. Vaughn also explained that the forestry management program would probably be changed so that tree planting would be at 250 per acre instead of 300 per acre. Stock adjustments (planting or pre-commercial thinning) would be optional at 8 to 10 years depending on the success of the initial plantings. The objective of planting at a lower density will be to provide better forage for a longer period of time while meeting DNR requirements for reforestation. This will reduce the potential slash problem for wildlife associated with pre-commercial thinning. Guidelines for dead and down material were discussed.

Metzgar presented a potential compromise scenario for hunting on the Lake Chaplain Tract to see if Engman would support it if the District presented it to the City of Everett. The scenario included hunting on the plateau above the Lake to the northeast and below the filtration plant. Engman stated that he could not comment on a compromise position at this time.

Footnote - Upcoming Agency Participation: Written agency comments on the Draft Wildlife Habitat Management Plan and the HEP analyses were requested by March 23, 1987. Crucial topics for agency consideration were outlined in a District letter dated March 5, 1987. Agency concerns discussed at the March 6 and 17 meetings should also be included. All comments should be as specific as possible.

Plan life is a very important consideration. Decisions in this regard relate to plan intensity and how fast impacts are offset. While some level of intensity will be needed to continue as long as the project exists (to offset permanent habitat losses), higher initial intensity is required to achieve more timely mitigation of the more than 25 years of impacts that have accumulated while no long-term mitigation has been in effect. Further consultation on this matter is needed.

Three assumptions outlined on p. 5 are fundamental to the approach we have mutually agreed to take; i.e., that lands with suitable habitat will be selected, retained, managed and preserved for improved on-site wildlife productivity to offset project impacts. Our further comments in this regard are, as we have discussed, that desired wildlife response to plan activity needs to be confirmed through follow-up evaluation. In addition to observation and measurement of physical features, the monitoring plan needs to be expanded to include factors that will measure wildlife response.

Agency objectives and priorities The stated objectives and priorities are accurate and reflect our views. We are concerned, however, that these objectives have not, as yet, been realized.

We identified four priority habitats on which to focus mitigation plan development. They are: old-growth coniferous forest, mature riparian forest wetlands, and young riparian forest. Unfortunately, the plan will result in only 28% of managed lands containing these habitats (p. 15) of which 20% will be old-growth coniferous forest, while 65% of the impacted lands were priority habitats and the majority was old-growth. Clearly, means to increase the proportion of priority habitats, particularly old-growth, needs to be explored.

Mitigation plan wildlife response, as indicated by the HEP, is out of proportion with project impact. Damages to high priority species/guilds that were heavily impacted by project construction (black-tailed deer, ruffed grouse, and black-capped chickadee) are still not offset even after 95 years. This implies "reservoir benefited" species, e.g. osprey, may be substituted. We do not agree. It is our objective that offsetting mitigation be in proportion to losses. Efforts to enhance species theoretically benefited by reservoir creation should not occur at the expense of species detrimentally affected.

Technical merit of proposed measures. In view of our other comments and the fact that this is a highly site-specific issue, we defer comments.

Acceptability of Mitigation Lands. The five candidate tracts i.e., Lake Chaplain, Lost Lake, Spada Reservoir to 1460 feet elevation, Williamson Creek, and "Project facility lands" are conditionally acceptable and desirable properties for mitigation plan development and implementation.

The conditions are (1) that incorporation of additional lands may be necessary to adequately offset project impacts and (2) that proposed constraints on public use of particularly the Lake Chaplain tract make this parcel ineligible for credit in mitigation of project impacts.

Biologically, all five tracts offer desirable existing or potential attributes as lands on which to implement a mitigation plan. In this regard, we urge you to move ahead with measures to advance your acquisition of Lost Lake and Williamson Creek tracts. Based on our review and results of the HEP, however, plan intensity and/or the overall area managed will have to be increased to offset project impacts.

Upon initial examination of the draft plan and follow-up discussions with your staff, we learned of the City of Everett proposal to prohibit hunting, fishing and overnight camping in its Lake Chaplain tract lands proposed for inclusion in this mitigation plan. Prior to this, in your March 20, 1986 correspondence and our other discussions, we were only aware of the City's desire to limit overnight camping. Lake Chaplain has been closed to fishing by us for some time. We were very surprised to learn that the city also intended to prohibit hunting.

As we stated very clearly more than one year ago, excessive restrictions on public use and ability to secure wildlife recreation benefits would be reason to disqualify candidate land parcels from receiving credit under this plan. This remains our position. The Lake Chaplain tract has a land area of 2027 acres in addition to the 441-acre reservoir. This amounts to 73% of the collective land area of all four tracts and approximately one-half of the mitigation plan wildlife improvements result from activity on this parcel. The only public use limitation on Sultan Basin lands and wildlife habitats, impacted by and now permanently removed from public and wildlife use by project development, was overnight camping. In light of these facts, we were willing to accept restrictions on overnight camping. But to impose further restrictions now, more than a year after we felt general understanding had been reached, is a breach of good faith consultation, and amounts to an additional project impact.

It is the Department of Game's mission to protect the wildlife resources for public benefit, including direct recreational benefit. We are quite willing to work out reasonable conditions for the protection of filtration plant or other facilities. We are also receptive to non-vehicular, walk-in concept of public use. We cannot, however, reconcile the city's desire to totally bar hunting on the entirety of the Lake Chaplain tract as being compatible with the use of their lands for mitigation of project wildlife losses.

Proposed HSI values for the mitigation HEP. In view of our other concerns, we defer comment on this issue.

HEP credit for un-rated measures. Based on our review of the draft plan and the HEP analysis appendix, it is unclear what measures were not included. Pending clarification, we defer comment.

E-74

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Specific Comments

2.1.2.p. 13. Area of lands to be managed is stated as 4990 acres. This is a misnomer. Actual land area is 2779 acres.

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2.2.3.p. 15. Specify how many years it will take to achieve "full implementation". For comparison, the areas and proportions of these priority habitats should be specified for both impacted and mitigation lands.

16

3.0 Evaluation Species. Specify and provide more detail regarding the species (guilds) intended to be represented by each evaluation species.

17

3.11.52. Might bald eagles also benefit from elements for osprey, or would modifications be necessary? If yes, specify and consider including in plan.

18

4.4., p. 61 and elsewhere. Full protection of wetland and stream areas may require buffer zones up to 200 feet.

19

General. There is a need throughout the plan for further clarification and definition of water quality constraints particularly as they apply to wildlife management and human use; explicit locations, boundaries and seasons for proposed vehicle and pedestrian access; and replacement of vague language such as "as much as possible" with specific requirements or criteria necessary to satisfy stated objective.

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Thank you for the opportunity to comment.

Very truly yours,

THE DEPARTMENT OF GAME

R. Gary Engman

R. Gary Engman
Habitat Management Division

RGE:cj

cc: USFWS - Ging
Tulalip Tribes - Somers
Division - Fenton
Region - T. Muller, B. Everitt, L. Leschner



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Olympia Field Office
2625 Parkmont Lane S.W., Bldg. R 3
Olympia, Washington 98502

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April 27, 1987

Mr. L. Chet Grimes
Manager, General Resources
Snohomish County PUD No. 1
P. O. Box 1107
Everett, Washington 98206

Re: Jackson Project FERC No. 2157; Draft Wildlife Habitat Management Plan

Dear Mr. Grimes:

We have reviewed the Draft Wildlife Habitat Management Plan (Plan), prepared by Beak Consultants Incorporated, and your letter of March 5, 1987, requesting our comments on six points relative to the Plan. This letter is our response to your request.

Approach of the Management Plan

With respect to the use of the Habitat Evaluation Procedures (HEP) as an appropriate method for assessing impacts and developing a mitigation plan, we are in agreement. However, we believe the draft Plan is lacking in its discussion of the fact that the application of HEP on the Sultan Project is atypical, and consists of a blending of a much earlier version of HEP with the present version. This melding of studies was necessitated by the fact that the project lands have already been inundated by the reservoir, precluding a reanalysis of the baseline habitat conditions using the current version of HEP. The reliance on the 1980 HEP for baseline conditions does place some real constraints on the 1986 HEP, such as on the choice of evaluation species and on the complexity of models used. Although we agreed in concept to these compromises, the limitations and consequences still need to be presented in the report.

With regard to specific points of the Plan, we question the appropriateness of using of 95-year period of analysis in the HEP. First, it spreads the District's and City's mitigation obligation over an excessively long period of time, 95 years. The terrestrial impacts were essentially immediate, i.e., during construction, and with the filling of the reservoir. A mitigation period of this length of time provides too little "front

E-75

end" mitigation. Secondly, a mitigation plan which extends beyond the license period places some uncertainty on obtaining the promised mitigation once the original license expires if it is not renewed by the original licensee. For these reasons, it is appropriate and essential for the period of analysis to parallel the license period.

We do not agree with the Plan's apparent approach at tradeoff mitigation. Until agreement has been reached between the licensee and the resource agencies that the habitat of adversely impacted species (ruffed grouse, black capped chickadee, pileated woodpecker, pine marten and black tailed deer) cannot be fully replaced, it is premature to consider tradeoffs involving the additional gains of one species to be used to offset the deficit of another species. It appears to us that this approach is being taken from the fact that the proposed mitigation prescriptions (artificial nesting islands, waterfowl nesting boxes, osprey nesting structures) would further benefit species (mallard, osprey, merganser) whose habitat has already been improved by the Sultan Project.

Statement of Objectives and Agency Priorities (Chapter 2)

Our position has been accurately presented in this chapter.

Technical Merit of Proposed Management Measures

We particularly like Beak Consultants breakdown of the mitigation lands into smaller, more manageable units. Furthermore, the development of management guidelines for specific units (stands) are site specific and should result in more effective mitigation efforts. We believe this is the strong point of the Plan. It is evident that considerable effort went into the development of these unit specific management plans.

However, there are aspects of the Plan which we do not support or which have not been developed far enough. We believe additional management measures should be developed to reduce the significant shortfall in mitigation for ruffed grouse, black capped chickadee and black tailed deer. We note from the report (Section 3.0; 45 year analysis period) that for these species, between 56% and 58% of the project related impacts still would not be mitigated under the presently proposed management measures. These species would benefit by a plan which maintains more acreage in the mixed or deciduous forest cover types. Half of the existing four hundred acres of mixed forest habitat (Table 1.) within the mitigation land base would be converted, primarily to coniferous forest that would be harvested on a 60-year rotational basis. The statement

(Page 5). "A timber management plan has been developed with wildlife habitat as the primary objective and timber as a secondary resource", is misleading at best. While certain concessions are made for the benefit of wildlife (smaller harvest units, earlier pre-commercial thinnings, density of replantings), we also note that the acreage of coniferous forest that would be harvested on a 60 year rotational basis would increase. These stands do not provide as much value to wildlife as do mixed or deciduous forest cover types. If wildlife mitigation is in fact the primary objective of the timber management plan, as stated, we would expect measures which would result in more acres of mixed and deciduous forest cover types, and fewer acres of 60-year rotational coniferous forest.

Other management options that we would like to see considered include: (1) creation of additional wetland areas (9 acres are proposed; 25 acres were lost); (2) widening of buffer strips along wetlands and streams (50-100 foot wide buffers are presently proposed); (3) allowing more coniferous forest to become old growth stands; (4) variable replanting density of conifers in some units, to less than the 300 per acre presently proposed; (5) longer period between time of harvest, e.g. 100 years.

As discussed earlier in this letter, we question the development of management measures for species (mallard, osprey and merganser) which have already benefited from the Sultan Project, when significant impact to ruffed grouse, black capped chickadee and black tailed deer still remain. We note that three of the seven detailed management techniques presented in Appendix A are directed at improving the habitat of the former.

Acceptability of the Proposed Mitigation Lands

We have several comments with regard to the acceptability of the proposed mitigation lands. First, we fully support the acquisition of the Williamson and Lost Lake Tracts. High priority should be given to the acquisition of these properties. These tracts can provide important wildlife mitigation, if the management of the area is directed to improvements to wildlife habitat rather than timber production. The present proposal to convert 73 of the 95 acres of mixed forest habitat (Lost Lake Tract) to 60-year rotational coniferous forest should be reassessed. Secondly, we have only recently learned that hunting would not be allowed on the Lake Chaplain Tract, which makes up 7% percent of the total mitigation lands proposed. While we can understand the safety reasons for controlling hunting around the filtration plant, the complete exclusion of hunting from any of the City of Everett's land seems unreasonable to us. During earlier meetings

with the District, the Service, and the Washington Department of Game stressed that public access must be an integral part of any mitigation land selected. While constraints on motor vehicle access to the Lake Chaplain Tract and restrictions on public access along the Lake Chaplain shoreline were mentioned by the District, nothing was said about prohibiting hunting. We believe the City and the District have an obligation to mitigate for the loss of hunting opportunities that resulted from the construction of the Sulton Project. It is our hope that a compromise can be reached, and that hunting would be allowed on at least the Lack Chaplain Tract lands on the "bench area" uphill of the filtration plant. The Lake Chaplain Tract should not be considered acceptable mitigation lands until satisfactory resolution of the hunting issue is reached.

Proposed HSI Values for the Mitigation HEP

We have reviewed the proposed HSI values, and overall, they appear reasonable. However, it should be noted that this conclusion is based on the underlying assumption that the management guidelines presented in the document will be adopted and carried out to the fullest extent. It is not clear to what extent logging safety restrictions or other constraints may reduce the effectiveness of the proposed wildlife management measures. For example, many of the management guidelines include the phrases, "if possible", "where possible", "should be", etc., which add a certain element of uncertainty to what is proposed for mitigation. If the effectiveness of the proposed mitigation is reduced by these constraints, the HSI values would need to be adjusted accordingly.


Appropriateness of Assigning HSI Credit to Management Measures Not Included in the HEP

It is unclear to us to what management measures you refer. It is our understanding that all of the management measures are reflected in the changes in HEP HSI values. If your question is directed at previous discussion between the resource agencies and the District regarding the Williamson Tract, the following discussion should clarify our position. During earlier meetings, a hypothetical situation was discussed regarding the selection of mitigation lands in the event that full mitigation could be achieved by several alternatives. In particular, the Williamson Tract was singled out because of its anticipated high cost. If the old growth dependent species could be fully compensated by less expensive alternatives, the Williamson Tract would drop out from consideration. Consequently, it was suggested that additional credit could be granted to the Williamson Tract because of its unique value. The amount of the bonus would then

depend on the mitigation land base it would replace. While we still believe this is an acceptable approach, the details need to be negotiated on a case by case basis. At the present time, it appears that the issue of additional credit may be a moot point because the inclusion of the Williamson Tract seems to be a necessary component of the mitigation proposal, particularly under the 45 year period of analysis.

In conclusion, we believe the licensees have made significant progress toward development of a wildlife mitigation plan, but certain aspects of the plan need further development and revision. Although several mitigation meetings have already been held, we believe another meeting is needed in order to discuss and resolve issues raised in this letter, as well as those raised from the Washington Department of Game and from the Tulalip Tribes.

Sincerely,

for 
Charles A. Dunn
Field Supervisor

cc: WDG, Engman
Tulalip Tribes, Somers
USFS, North Bend (Kearney)
Beak Consultants, Portland

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WASHINGTON STATE DEPARTMENT OF
Natural Resources

Ph: (206) 856-0083

April 29, 1987

(P.O. Box 302, Everett)
(P.O. Box 1107, Everett)

Northwest Area
919 N. Township St
Sedro Woolley, WA 98284

17352

May 13, 1987

Mr. Pete Newland
P.U.D. Commissioner
P.O. Box 1107
Everett, Washington
98206

Dear Sir:

At our recent meeting of the Sultan Sportsmen's Club, we were made aware of mitigation proceedings regarding Spada Basin & the Lost Lake area. We as a body are asking you to preserve Lost Lake in it's natural state.

We know the the developers will eventually have everything covered with cement, but please lets keep nature as it is as long as possible.

Thank you for listening.

Sincerely,

Marion C. ...

Sec.&Treas.
Sultan Sportsmen Club

L. C. Grimes
Snohomish County P. U. D. #1
P. O. Box 1107
Everett, Washington 98206

Dear Chet:

As we discussed at our April 7, 1987 meeting, Department of Natural Resources has deferred management on the Williamson Creek parcel pending P.U.D.'s completion of a wildlife mitigation study. Several options have been identified for P.U.D. lease or acquisition of the site. If you will send me the results of the timber cruise conducted by your consultant, I can give you a cost estimate for the various options. I would like to target December 31, 1987 for P.U.D. to act on their preferred option.

In the absence of a decision by that date, DNR will proceed to implement deferred management plans in 1988.

If you have questions regarding the available options, please contact me through our Sedro Woolley office, phone 856-0083.

Sincerely,

William J. Wallace
William J. Wallace
Assistant Area Manager

WJW:jps

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SNOWHOMISH COUNTY

PUBLIC UTILITY DISTRICT No. 1

2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

June 8, 1987
PUD-17394

Mr. Gary Engman
Washington Dept. of Game
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Roger Williams
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Mr. Joe Potter
Department of Natural Resources
919 North Township
Sedro Woolley, WA 98284

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Charles A. Dunn
Field Supervisor
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Agency Meeting

This is to remind you of the consultation meetings scheduled for June 26 and July 22, 1987. Both meetings will be held at the Everett Business Park (9930 Evergreen Way) in Building "A", Conference Room "A", at 9:00 a.m. We will be discussing the future direction of our mitigation planning efforts on June 26. Your participation will influence that direction.

You will be receiving the Licensees responses to agency review comments within the next week. It would be helpful if you would read them prior to the meeting on June 26.

We look forward to moving ahead toward a final mitigation plan.

Very truly yours,
Original Signed By
L. C. GRIMES

L. Chet Grimes
Manager, Generating Resources

C. Oliver, City of Everett
G. Grogg, USFWS
H. Vaughn, Beak Consultants

SNOWHOMISH COUNTY

PUBLIC UTILITY DISTRICT No. 1

2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

June 16, 1987
PUD-17389

Mr. Gary Engman
Washington Dept. of Game
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Roger Williams
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Mr. Joe Potter
Department of Natural Resources
919 North Township
Sedro Woolley, WA 98284

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Charles A. Dunn
Field Supervisor
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Licensees' Response to Agency Review Comments

The District has received written comments from the U.S. Forest Service, Washington Department of Game, and the Fish and Wildlife Service, U.S. Department of the Interior. This communication transmits the Licensees' (District and City of Everett) response to those written comments. If review comments are received in time from the Tulalip Tribes or Washington Department of Natural Resources, they will be incorporated in the next phase of plan development.

In reviewing resource agency comments and preparing proposed responses, it became apparent to District staff that the content and thrust of those comments could be grouped into representative categories or types. These groupings or categories provide insight on the status of plan development and a strategy for future consultations. The categories are:

- 1) communication - a comment generated by the need for clarification or further information to aid agency evaluation of the proposed plan;

- 2) technical - a comment related to specific aspects of the Habitat Evaluation Procedure and subsequent products;
- 3) new issue - evaluation at this time identified something that was not previously recognized to be significant to a party's interests; and
- 4) policy - a comment based on values, preferences, rules, regulations or statutory law regarding a plan issue.

The purpose of this letter, the responses (enclosed), and subsequent consultations are intended to resolve any and all communications-based comments/issues. Effective communications should also be able to address satisfactorily technical issues in nearly all instances. However, differences can exist between the Licensees and resource agencies due to the necessity for applying assumptions and subjective judgment in employing the Habitat Evaluation Procedure for plan development. With new issues, all parties should be willing to consider the others reply, relying upon the constructive process employed thus far in plan development by all parties. If matters of policy are involved and become unresolvable, then a different set of participants at other levels will have to become involved in order to address differences.

The progress and the areas of apparent concurrence noted by agency comments are significant, should be encouraging to both parties, and should provide a sense of confidence for the effort needed to complete plan development. Not unexpectedly, however, some differences were identified. The Licensees would like to mention these differences briefly in order to facilitate the next consultation session. The differences of seemingly greatest significance revolve around one basic parameter - mitigation plan acceptability criteria. These criteria which emerge from the written comments include:

- 1) public use activities with the Lake Chaplain tract (no hunting and restricted areas);
- 2) amount of mitigation for priority habitat in the proposed plan;
- 3) adequacy of mitigation for black-tailed deer, ruffed grouse, and black-capped chickadee;
- 4) mitigation trade-offs;
- 5) duration of mitigation plan; and
- 6) overall sufficiency of proposed mitigation.

Item #1 - public access/use with the Lake Chaplain tract - is a policy issue for both sides. Some additional information is provided about it by the enclosed map, which was prepared in partial response to comment #20 by the Washington Department of Game. We expect to fully discuss this issue during the next consultation.

Item #'s 2 - 5 are technically interrelated and include some policy issues. Our responses address them. Resolution of those technical and policy issues leads directly then to establishing answers to questions about item #6.

We suggest that besides considering the Licensees' responses to your comments that your attention should now be focused on the bottom line - plan acceptability criteria and the six criteria related to it which have emerged prominently from resource agency comments. Based on the work that has been completed on the draft wildlife habitat management plan and the content and apparent thrust of agency review comments, the plan development process is ripe to enter an active negotiating phase in consultations rather than a continuation of exchanging written communications. We suggest this strategy because of the status of plan development, the nature of the differences apparent now, and that direct consultation will be more effective and expedient than a continuing exchange of written comments. To eventually conclude the plan development process, the proposed plan must go before two sets of elected officials (District and City). Thus, time is of the essence in the context of completing the plan on schedule in accord with the FERC Order.

We look forward to a productive meeting on June 26. The meeting is scheduled to start at 9:00 a.m., Conference Room "A", Everett Business Park PUD offices.

Very truly yours,

Original Signed By

L. C. GRIMES

L. Chet Grimes

Manager, Generating Resources

Enclosures (4)

- 1) U.S. Forest Service comments/responses
- 2) U.S. Fish & Wildlife Service comments/responses
- 3) Washington Department of Game comments/responses
- 4) Map - proposed public access and use

RGM:jk

cc: G. Ging, USFWS

Licensees' Response to U. S. Fish and Wildlife Service Comments
(April 27, 1987) on the Draft Wildlife Habitat Management Plan

years. The agencies were requested to provide comment at the meeting and in writing by mid-August, 1986. Meeting notes prepared by the District and sent to the agencies in late-July mentioned specifically that there "would be a 100-year analysis period and that the mitigation program would be approximately 70 years (to year 2060)". During the meeting, the target years were agreed upon and the agencies did not take issue with the proposed period of analysis, in their written or verbal comments. Since that time, the District has spent over \$200,000 preparing a mitigation plan to year 2060. The 45-year analysis period included in the HEP report was simply the result of cutting off the 95-year period of analysis at year 2010. It does not represent a comprehensive plan through year 2010. Strategies for maximizing benefits to wildlife are different for a plan through year 2060 than they are for a plan through year 2010. The entire mitigation plan and the HEP would have to be redone if a plan through year 2010 were required. At this stage in plan development, that effort is unnecessary and the Licensees consider it unequitable to request a 45-year period of analysis and plan for the current license period.

2b. "Front end" mitigation is a new term. Some project impacts on terrestrial habitat and wildlife species may have occurred immediately, however, the premise of HEP is that the impacts continue to exist overtime in terms of habitat no longer available for most terrestrial wildlife species (i.e. the inundated area). The HEP conducted for the Jackson Project accounts for impacts through the year 2060. If a 45-year period of analysis were used, impacts would be considered only

- E-81
1. Explanation of applying HEP to the Jackson Project will be presented in an appendix to the final draft of the management plan. In addition, more HEP discussion will be included in the text of the plan. The Licensees used the Habitat Evaluation Procedures (HEP) to assess impacts and develop a mitigation plan solely because the U. S. Fish and Wildlife Service (FWS) and Washington Department of Game (WDG) requested it. The Licensees proposed that another method of assessing the value of the mitigation plan be used, such as acreage of habitat, because of the problems mentioned by FWS and the excessive cost of conducting HEP. Since the resource agencies demanded that HEP be applied on the Jackson Project as a basis for developing the mitigation plan, any limitations or consequences are not incumbent upon the Licensee to defend. The resource agencies were allowed and encouraged every opportunity to participate fully in developing the HEP specific to this project.
 - 2a. The planning period was set previously in consultation with resource agencies. On July 15, 1986, the District met with the resource agencies to discuss the current status of mitigation plan development and obtain agency concurrence on several matters including procedures for updating the impact HEP and performing the mitigation HEP, and determining target

through year 2010. Mitigation after year 2010 (during the new license period) would presumably be based on continued impacts of operation. Therefore, total mitigation for the life of the Project would be the same with a plan developed through year 2010 and required mitigation through the life of the Project (year 2060), as with a plan developed now through year 2060. A plan for the life of the Project ensures a consistent and comprehensive program. A long-term mitigation period provides greater assurance and protection of a land resource base for wildlife in an urbanizing environment. The land and timber resources will probably increase substantially in value during the life of the Project. Thus, the value of the land base will be even more valuable to the licensees due to its development potential. Consequently, a long-term planning, development and management period and related commitment is highly advantageous to terrestrial wildlife resources.

- 2c. Mitigation plan duration can be set for a designated target year by the FERC. The Licensees support year 2060 rather than year 2010. A plan which covers a "long period of time" will benefit wildlife resources more than short-term planning (see #2b above). For example, with a short-term plan, if all of the old-growth forest losses are mitigated by year 2010, the old-growth component (considered highest priority by the agencies) probably would not be maintained at the same level in future management plans. After year 2010 much of the management land base would be removed from future programs because the mitigation obligation would be reduced. As presented, the draft mitigation plan would compensate for 204 percent of the old-growth impacts (Table 1, attached). Shorter term "front-end" mitigation (completed by year 2010)

would force the Licensees to reduce the old-growth program. Therefore, the Licensees disagree with the FWS that the period of analysis should parallel the license period to year 2011, since the mitigation program would have a duration of only 24 years.

3. The proposed plan reflects agency habitat type priorities rather than a species-by-species mitigation approach.

The FWS comment has two components:

- a) The first concerns the adequacy of mitigation for habitat represented by the six evaluation species negatively affected by the Project. The HEP results (Table 1) indicate that the plan as presented would mitigate more than 100 percent for impacts to three of these species (pileated woodpecker, pine marten, and Douglas squirrel). These species represent the highest priority habitat - old-growth forest. Less emphasis was placed on early- and mid-successional forest habitat type because it was not considered a high priority by the resource agencies. The three evaluation species mentioned (black-tailed deer, ruffed grouse, and black-capped chickadee) are most benefited by early- and mid-successional forest and edge conditions. Black-tailed deer and ruffed grouse also were designated by the Licensees and agencies in the HEP process to represent riparian habitat. To provide more riparian habitat (a high priority by the agencies) would require inundating more terrestrial habitat. The species mitigation results reflect the agencies' habitat type priorities and

limitations in mitigation. An implicit trade-off should be acceptable to the resource agencies for evaluation species representing the highest priority habitat - old-growth forest.

- b) The second component concerns habitat represented by evaluation species benefited by the Project. The HEP analysis indicates that mallard, common merganser, osprey and beaver benefited from the Jackson Hydroelectric Project (Table 1). Generally, the FWS places an emphasis on management for waterfowl and osprey. This emphasis is reflected in the FWS Regional Resource Plan for Region 1 (1982) in which they are considered "National species and species groups of special emphasis" (which includes surface feeding duck "group", wood duck, mallard, Canada goose, and osprey) and also in the Puget Sound Strategy Plan. Also, mallard, common merganser, and beaver represent wetland habitat which was assigned high priority by the resource agencies. In addition to the benefits resulting to these species from the Jackson Project, management measures were proposed as further mitigation based on an assumption that benefiting priority species would be acceptable. If the FWS prefers more mitigation for species related to lower priority habitat type and not among migratory waterfowl or for osprey, the Licensees will delete the proposed mitigation measures from the plan.

4. Comment noted.

5. Comments noted.

6. The forestry management plan for the Lake Chaplain Tract was developed with wildlife mitigation as the primary objective. Smaller harvest units and replanting density as well as spacing of harvest units are not minor measures, are costly, and would not be included in a plan developed primarily for timber harvest. A plan focusing on timber harvest would manage more than 65 percent of the tract as second-growth forest. Timber will be harvested on the Lake Chaplain lands regardless of whether or not the lands are used for wildlife mitigation. However, if the wildlife mitigation plan is implemented, the profits will be considerably less than with the timber plan developed in 1983 for the Lake Chaplain lands. Mixed and deciduous forest were not emphasized because the agencies specified other higher priority habitat types. Harvest on a 60-year rotational basis, small harvest units, careful spacing of cuts, and many of the other management measures presented in the specific stand prescriptions were proposed to emphasize benefits to black-tailed deer and ruffed grouse within the Lake Chaplain Tract. The HEP analysis indicates that the plan as presented would mitigate 69, 82, and 56 percent of the losses to these species, respectively. In further consultations with the resource agencies, the Licensees are willing to consider measures which would provide additional mitigation benefits for black-tailed deer, ruffed grouse, and black-capped chickadee on the Lake Chaplain tract.

7. Regarding other management options that FWS would like to see considered:

E-83

E-84

- (1) The HEP analysis indicates that wetland habitat losses would be mitigated by 143 percent (Table 1). If additional wetland areas were created, trade-off mitigation would be necessary. However, trade-off mitigation that benefits mallard, common merganser, osprey, and beaver may not be acceptable to the FWS (see #3 above).
- (2) The Licensees are willing to consult further on widening of buffer strips along wetlands and streams. Many of the streamside buffers are along drainage ways rather than major streams. Discussion of buffer strips on a case-by-case basis might be appropriate.
- (3) The HEP analysis indicates that old-growth forest losses would be mitigated by 204 percent. Therefore, the Licensees believe that the plan as presented adequately meets the resource agencies high priority habitat type objective for old-growth. Requesting more old-growth forest appears inconsistent with the FWS request for more mitigation for black-tailed deer, ruffed grouse, and black-capped chickadee. The FWS request for more old-growth forest implies acceptability of trade-off mitigation.
- (4) The Licensees propose planting 250 seedlings per acre and making stocking adjustments as needed between years 3 and 10 to meet wildlife management objectives and DNR requirements for reforestation. As discussed during the March 17, 1987 consultation, planting at this lower density will provide better forage for a longer period of time and reduce the potential slash problem for wildlife associated with pre-commercial thinning.

- (5) A longer period between time of harvest probably would reduce the value of the plan for black-tailed deer, ruffed grouse, and black-capped chickadee. A balance between the late-successional species and early- to mid-successional species was provided in the plan with priority going to old-growth management (204 percent mitigated) at the request of the resource agencies.

- B. See #3 above.
- 9a. FWS support for acquisition of Williamson Creek and Lost Lake Tracts is noted. Wildlife habitat management is the primary objective on all proposed mitigation lands.
- 9b. The Licensees are willing to consult further with the resource agencies about management plans for the Lost Lake tract, if FWS believes that the mitigation value can be increased through a different management plan. Lost Lake tract management as presented was to maintain forested lands as mixed forest (page 136, first complete paragraph). This point may be unclear in Section 5.5 - Proposed Management.
- 9c. Hunting is a new issue. The Licensees were advised by the FWS and Washington Department of Game of their concern over public accessibility to the Lake Chaplain tract and its acceptability for mitigation purposes. Public accessibility information was provided in a letter to the resource agencies on March 20, 1986, and in the draft plan distributed for agency review. The hunting issue was not mentioned

initially until March 6, 1987, during a consultation meeting. There is a significant difference between public access/recreational opportunities and hunting. Overall, the Project has provided increased recreational opportunities in the Sultan Basin by creating a reservoir and improving access to its shoreline and the Sultan River. Present sport fishing at Spada Lake greatly exceeds previous total hunting and fishing activity in the Sultan Basin before the Project. The demand that all mitigation lands be available for public hunting ignores the extent to which the public can now hunt on lands in the Sultan Basin. The Project's reservoir inundated 1,870 acres out of a total of 69 square miles or 44,160 acres behind Culmback Dam. Non-consumptive recreational uses in certain areas of the Lake Chaplain tract would be allowed. Requiring or demanding hunting conflicts with non-consumptive users interests and safety. Prior to rejecting the Lake Chaplain property as part of the mitigation land base because of no hunting, the resource agencies should recall that in-basin mitigation was to be a high priority. Other land in-basin suitable for mitigation is scarce to non-existent.

10. It is impracticable to provide absolute specifications considering variability in the natural environment. A realistic plan has been presented which means some flexibility is required. The agencies have requested that the plan be flexible from their perspective. Therefore, the Licensees are confident that the agencies will accept some realistic flexibility in management. The reporting process will cover variations in actual management from that originally proposed. The Habitat Suitability Index (HSI) values used in the HEP analysis were

conservative and were developed with these potential variations in mind. Licensee/agency meetings will be conducted so that these variations from the proposed plan can be discussed with the resource agencies during plan implementation.

- 11a. Management measures not included in the HEP analysis include waterfowl nest boxes, raptor perch poles, and the Spada Lake shoreline planting program. As explained at the March 6 and 17 consultation meetings and in meeting summaries, if mitigation credit is not received for these measures, they will be eliminated.
- 11b. The Williamson Creek tract is believed to have a high cost for either leasing or direct acquisition for wildlife mitigation purposes. The FWS supports acquisition of the Williamson Creek tract (FWS comment #9a). The HEP analysis shows that old-growth forest would be mitigated at 204 percent, therefore, if the Licensees acquire the entire tract, additional or trade-off mitigation credit will be necessary. Otherwise, the Licensees will release a portion of that tract proportional to the needs for mitigation.
12. Comments noted. The Licensees agree that further consultations are needed and should provide useful results. Consultations have been scheduled for June 26 and July 22, 1987.

E-085

Table 1. Comparison of Average Annual Habitat Units (AAHU's) resulting from the Mitigation and Impact HEP Analysis.

SPECIES	AVERAGE ANNUAL HABITAT UNITS			
	Impact HEP Net Change	Mitigation HEP Net Change	Overall With Mitigation	Percent of Losses Mitigated
Black-tailed deer	-1054	730	- 324	69
Ruffed grouse	- 703	574	- 129	82
Black-capped chickadee	- 861	480	- 381	56
Pileated woodpecker	- 646	892	246	138
Pine marten	- 641	709	68	111
Douglas squirrel	- 512	610	98	119
Mallard	58	97	155	-
Common merganser	416	73	489	-
Beaver	80	77	157	-
Osprey	853	469	1322	-

Black-tailed deer A ¹	- 174	23	- 151	13
Ruffed grouse A ²	- 53	32	- 21	60
Pine marten A ³	- 137	280	143	204
Beaver A ⁴	- 14	20	6	143

E-06

¹Represents Habitat Units attributed only to young riparian forest.
²Represents Habitat Units attributed only to mature riparian forest.
³Represents Habitat Units attributed only to old-growth forest.
⁴Represents Habitat Units attributed only to wetland.

Licensees' Response to Washington Department of Game Comments
 (April 20, 1987) on the Draft Wildlife Habitat Management Plan

1. Comments noted. Also, the acreage inundated by the reservoir, Spada Lake, is 1,870 v. 1,770 acres.
2. The plan as presented mitigates over 100 percent for all but three of ten evaluation species. The species mentioned by the Department of Game (WDG) are most benefited by management for early and mid-successional habitat. These cover types were not identified as priority habitats by the resource agencies. Thus, plan development focused on mitigating initially for agency habitat priorities (old-growth, mature riparian, wetland and young riparian). Old-growth and wetland habitat would be mitigated 204 and 143 percent, respectively. A technical problem occurs, however, with riparian habitat. To provide more requires inundating more terrestrial habitat. The Habitat Evaluation Procedures (HEP) analysis indicates that the plan as presented would mitigate 69, 82, and 56 percent of the losses to black-tailed deer, ruffed grouse, and black-capped chickadee, respectively. Pileated woodpecker, pine marten, and Douglas squirrel losses would be mitigated 138, 111, and 119 percent, respectively (Table 1 - attached). Additional enhancement measures were proposed for species (mallard, common merganser, beaver, and osprey) benefited by the Project in order to maximize the potential

wildlife value of proposed mitigation lands. The plan could be modified to increase the amount of early- and mid-successional habitat for black-tailed deer, ruffed grouse, and black-capped chickadee, but that will result in a decrease in old-growth habitat and mitigation for pileated woodpecker, pine marten, and Douglas squirrel, as well as mallard, common merganser, beaver, and osprey. Old-growth and wetland habitat was considered high priority by the resource agencies, therefore, it seems reasonable to consider trade-off mitigation favoring these habitat types.

old-growth losses are mitigated by year 2010, the old-growth component (considered highest priority by the agencies) probably will not be maintained at the same level in future management plans. After year 2010, much of the management land base would be removed from future programs because the mitigation obligation would be reduced. As presented, the mitigation plan would compensate for 204 percent of the old-growth impacts. Shorter term, higher initial intensity mitigation would reduce the old-growth program benefits to 125 percent in the context of HEP analysis.

E-87

3. The Wildlife Habitat Management Plan runs from 1988 through 2060. The HEP analysis runs from 1960 through 2060 and includes impacts from the Jackson Project and construction mitigation measures. The Fish and Wildlife Service's HEP computer program handles 1960 as Target Year 0 and 1965 as Target Year 1; therefore, to obtain Average Annual Habitat Units (AAHU's), the total number of Habitat Units (HU's) is divided by 95 years. As explained during the March 6, 1987 meeting, the 45-year HEP analysis simply cut off at year 2010, the Plan developed to continue through year 2060. In hindsight, the 45-year analysis tables should not have been included in the HEP report (considering the confusion caused) because they do not reflect a 45-year management plan, but simply show how much mitigation would be accomplished by year 2010.

Further, the planning time frame to year 2060 as a basis for plan development was thoroughly discussed prior to starting plan development. On July 15, 1986, the District conducted a meeting with the resource agencies to inform them of the current status of mitigation plan development and obtain agency concurrence on several matters including procedures for updating the impact HEP and performing the mitigation HEP, and determining target years. The agencies were requested to provide comment at the meeting and in writing by mid-August. Meeting notes prepared by the District and sent to the agencies in mid-July mentioned specifically that there "would be a 100-year analysis period and that the mitigation program would be approximately 70 years (to 2060)". During the meeting, the target years were agreed upon and the agencies did not take issue with the proposed period of analysis in their written or verbal comments. Since that time, the District has spent over \$200,000 preparing a mitigation plan to year 2060. The 45-year analysis period data included in the HEP report were simply the results of cutting off the 95-year period of analysis at year 2010. They do not represent a comprehensive plan

4. As a practical matter, it is difficult to regain lost wildlife production for the first 20 years of the Project by year 2010. A long-term management plan will benefit wildlife resources more than short-term planning. For example, with a short-term plan if all of the

through year 2010. Strategies for maximizing benefits to wildlife are different for a plan through year 2060 than they are for a plan through year 2010. The entire mitigation plan and the HEP would have to be redone if a plan through year 2010 were required. At this stage in plan development that effort is unnecessary and the Licensees consider it unequitable to request a 45-year period of analysis and plan for the current license period.

5. The Plan monitoring program will be revised once basic mitigation measures have been agreed upon by the Licensees and resource agencies. The Licensees concur with the basic concept of the need for monitoring activity. However, factors inherent in the wildlife species population dynamics other than those which are within the scope, control and responsibility of Project Licensees may come into play. The observed results may or may not be due to the mitigation plan. The principal criteria for monitoring should be habitat management, which is quite definitive. It has either been done or it hasn't and it is easily verifiable. The agencies are reminded that one of the major reasons for conducting HEP was to avoid basing mitigation on population studies which can be unreliable "indicators of habitat value" (MDG 1982). Nevertheless, some thought will be given to methods of evaluating wildlife response and incorporating them into the proposed plan, if appropriate. Further consultation is expected with the resource agencies on plan monitoring.

6. Comment noted.

7. The resource agencies demanded that the Licensees use HEP to evaluate impacts and the value of proposed mitigation, and that a special HEP analysis be conducted to evaluate priority habitats. While 65 percent of the lands may have been priority habitats prior to Project construction, the HEP process looks at what would have occurred on the land over time (through 2060 in this case) without the Project as the baseline condition. Most of the old-growth coniferous forest would have been cut (see Section 1.1 of the HEP report). The HEP analysis indicates that old-growth forest losses would be mitigated 204 percent (Table 1). Wetland, mature riparian, and young riparian habitats would be mitigated 143, 60, and 13 percent, respectively. Riparian habitat is difficult to mitigate because development of additional riparian habitat would require inundating terrestrial habitat. The planning process focused on all four of these cover types and mitigation is proposed to the greatest degree feasible.

8. The agency mitigation strategy of specifying priority habitat types on the one hand and then on the other demanding a balancing of numbers derived via application of HEP is technically infeasible and inconsistent. Protection of an existing high priority habitat type, such as old-growth forest, does not provide an opportunity to generate numbers for species heavily effected by the Project like black-tailed deer, ruffed grouse and black-capped chickadee. The agencies need to reconcile their priorities between habitat-type and species. If species is a preferred criteria for acceptability, then a different emphasis is implied for opportunities with areas available to the Licensees for mitigation. Black-tailed deer, ruffed grouse, and black-capped

E-88

chickadee were not identified as "high priority species/guilds" by the resource agencies. Whereas, old-growth, wetlands, and riparian habitat types were stated as high priority habitat types. Some of the proposed old-growth forest management can be revised to provide more early and mid-successional forest which would promote benefits to black-tailed deer, ruffed grouse and black-capped chickadee. Consistency is needed on mitigation priorities and preferences while developing the mitigation plan within the context and protocol of HEP.

- 9. Plan development and work schedule to comply with the FERC Order on the terrestrial resources mitigative plan require resource agency consultation and cooperation in providing review comments on a timely basis. The Licensees disagree with the HDG deferral of comment on the technical merit of proposed mitigation measures. In order to proceed in an orderly and timely fashion with the wildlife mitigation plan, technical comments were requested by the District to be submitted on March 23, 1987, by the resource agencies. Further deferral of comment is unacceptable. Therefore, the HDG deferral position is interpreted by the Licensees to mean concurrence.
- 10. (1) Comments noted. Further consultation will address these issues.
- (2) Hunting is a new issue. The Licensees were advised by the Fish and Wildlife Service (FWS) and Washington Department of Game of their concern over public accessibility to the Lake Chaplain tract and its acceptability for mitigation purposes. Public accessibility

E-89

Information was provided in a letter to the resource agencies on March 20, 1986, and in the draft plan distributed for agency review. The hunting issue was not mentioned initially until March 6, 1987, during a consultation meeting. There is a significant difference between public access/recreational opportunities and hunting (use of firearms, in particular). Overall, the Project has provided increased recreational opportunities in the Sultan Basin by creating a reservoir and improving access to its shoreline and the Sultan River. Present sport fishing at Spada Lake greatly exceeds previous total hunting and fishing activity in the Sultan Basin before the Project. The demand that all mitigation lands be available for public hunting ignores the extent to which the public can now hunt on lands in the Sultan Basin. The Project's reservoir inundated 1,870 acres out of a total of 69 square miles or 44,160 acres behind Culmback Dam. Non-consumptive recreational uses in certain areas of the Lake Chaplain tract would be allowed. Requiring or demanding hunting conflicts with non-consumptive users interests and safety. Prior to rejecting the Lake Chaplain property as part of the mitigation land base because of no hunting, the resource agencies should recall that in-basin mitigation was to be a high priority. Other land in-basin suitable for mitigation is scarce to non-existent.

- 11. Comments noted. HDG support for acquisition of Lost Lake and Williamson Creek Tracts is noted. Further consultation will address plan intensity and/or overall area managed.

12. Hunting is a new issue. See #10-2 above. The HDG comment as to the no hunting prohibition representing "a breach of good faith" consultation and amounts to an additional project impact is rejected by the Licensees as lacking any basis in fact since the HDG was the party that has raised the issue now. Public access has, heretofore, been the issue, not hunting. Similarly, several demands or conditions of acceptability/feasibility have been identified by the resource agencies in recent written comments. Raising new issues based on further information does not represent a "breach of good faith". The Licensees remind the HDG that the FERC has already ordered in the Project License authority to the Licensees to retain control over property within the Project boundary for purposes of maintaining public health and safety. Further, that the public access issue was once before a matter of public disagreement and resolved by allowing public use and access in the Sultan Basin at Spada Lake while authorizing closure in the Lake Chaplain watershed (License Article 44). As a result of public use/access at Spada Lake, the City of Everett was ordered by the Washington Department of Social and Health Services to provide treatment of its water for municipal supply. The water filtration plant cost \$30,000,000 to build, and operation and maintenance cost \$2.5 million annually. The plant design is based on the average water quality in the Sultan Basin. Increased public activity could alter that factor and result in further additional costs for water treatment. A HDG statement accepting liability responsibility for personal injury or property losses due to injury by the public using firearms on Project mitigation lands (if permitted by the Licensees) would be helpful in resolving the disagreement. Firearms use is a disturbance factor which could

E-90

negatively affect the presence of wildlife on mitigation lands. Being mindful of earlier HDG comment (#5) about evaluating wildlife response, some consideration must be given to reconciling reduced wildlife use/production due to human activities on mitigation areas, if allowed.

13. Plan development and work schedule to comply with the FERC Order on the terrestrial resources mitigative plan require resource agency consultation and cooperation in providing review comments on a timely basis. The District specifically requested comment on the Habitat Suitability Index (HSI) values proposed for the mitigation HEP in this review/comment period. Deferring comment on HSI values could delay completing the wildlife plan in accord with the FERC Order as well as increasing possible plan development costs to the Licensees, if HDG later decides that the HSI's are unacceptable. One of the merits of HEP is that wildlife habitat evaluation is conducted on a step-by-step basis thus avoiding bias to the results. Therefore, to be consistent with HEP protocol and orderly plan development, agency review comments on HSI values should have been provided by this time. The Licensees disagree with the HDG deferral on commenting on HSI values. Further deferral is unacceptable in the context of the work schedule essential to meet the FERC Order. Please refer to review comments by U.S. Fish and Wildlife Service regarding acceptability of HSI values (FWS #10).
14. Management measures not included in the HEP analysis include waterfowl nest boxes, raptor perch poles, and the Spada Lake shoreline planting program. As explained at the March 6 and 17, 1987 consultation meetings and in meeting summaries, if granting mitigation credit to the Licensees

for these measures is unacceptable to the resource agencies, the measures will be removed from the plan.

15. Management "lands" is a general term. Section 1.3 Description of the Management Lands states "The management lands consist of 4,990 acres of upland, wetland, lake, and reservoir habitat". The acreage table specifically states the number of reservoir and lake acres included. The term "management lands" is simply the most expedient way to refer to the acreage base proposed for mitigation.

16. The initial "implementation phase" of the mitigation plan runs from 1988 through 1995 (page 190 of the Draft Plan). Activities conducted during this phase include development or placement of any physical improvements such as wetlands, nest boxes, and nesting islands, initiation of forest management activities, and initiation of the monitoring program. The second phase runs from 1996 through 2060 and includes the continuation of forest management activities, monitoring, and maintenance of all improvements. "Full implementation" is a continuing process which is documented in the Detailed Management Prescriptions and will be summarized in the next draft of the management plan, once agreement has been reached on mitigation measures.

Areas of priority habitats were incorporated in the HEP process. The Licensees at the request of the agencies conducted the HEP rather than basing mitigation on acres of habitat lost, and specifically isolated the priority habitats as part of the HEP analysis. Results of the HEP

analysis for impacted and mitigation lands are presented in Table 1 (attached). See Section 1.1 and 2.1 in the Draft HEP Report for information regarding areas of priority habitat.

17. HEP evaluation species list. The evaluation species used for the HEP (both impacts and mitigation) were selected to represent the major types of habitat that were present or would have been present if the project had not been built. They were not chosen as representatives of specific guilds or life forms, but rather they were chosen as indicators of the major physical attributes of the habitat that was lost. This was done in direct response to agency concerns about the loss of specific habitats (i.e., old-growth) rather than specific wildlife populations. The net effects of both approaches are the same, habitat for several species of wildlife is measured and accounted for, but the link between evaluation species and the remaining species capable of using the habitat is not as direct as in a guilding approach.

The evaluation species, and the habitat features they represent, are listed below. Some of the other species represented by the evaluation species are also shown, but this is by no means an exhaustive list. Further information is provided in Section 3 of the Draft Plan.

1) Black-tailed Deer

The black-tailed deer utilizes all of the terrestrial habitat types found in the basin, but it finds optimal habitat in areas of high interspersed forest cover and early-successional shrubs.

E-91

It represents all terrestrial species in general, but specifically it represents animals that require: (1) high interspersed forest successional stages, and (2) well developed shrubs. These include the rufous hummingbird, northern flicker, common raven, black bear, raccoon, and ermine.

2) Ruffed Grouse

The ruffed grouse also requires high interspersed forested and non-forested cover types, but it is more closely associated with deciduous and riparian forest in western Washington, specifically forests of black cottonwood and big-leaf maple. Species that will benefit from this type of habitat include the band-tailed pigeon, barred owl and mountain beaver.

3) Black-capped Chickadee

The chickadee is associated with deciduous and mixed forest, and within that habitat it has the specific requirement of being a cavity nester. It is therefore an indicator of both the general habitat type and the specific habitat feature. Species that will find habitat in similar areas are the downy woodpecker, bushtit and brown creeper.

4) Pileated Woodpecker

The pileated woodpecker is a primary excavator common to dense, mature forests of conifers and mixed conifer/hardwood. It is representative of the mature stand condition and it is an indicator of habitat suitability for most species of primary and secondary cavity nesters including hairy woodpecker, red-breasted sapsucker, northern flicker, pygmy owl and long-tailed weasel.

5) Pine Marten

The pine marten is a forest dwelling carnivore associated with large tracts of mature or old-growth coniferous forest. It is presently used by the U.S. Forest Service as an indicator of these habitat conditions. Species with similar habitat requirements include the flying squirrel, spotted owl and red-backed vole.

6) Douglas Squirrel

The Douglas squirrel is associated with mature, cone-bearing Douglas-fir trees but it is equally abundant in small sawtimber, large sawtimber and old-growth if there are adequate nest sites. It was selected as a general indicator of mid to late-successional coniferous forest, which provides habitat for most of the species listed for the pileated woodpecker and pine marten.

E-92

7) Mallard

This species was chosen because it is the most common species of waterfowl that utilizes both wetlands and reservoirs in the Project area. As an indicator of waterfowl habitat, it also represents the bufflehead, common golden eye, common loon and others.

8) Common Merganser

This species is most commonly associated with major rivers and lakes in western Washington, and it is a cavity nester. It represents riverine, riparian and lake habitat which will also support harlequin ducks, tree swallow, mink and several species of amphibians.

9) Beaver

The beaver was selected to represent stream and wetland habitat. Species represented by the beaver include river otter, muskrat and various waterfowl species.

10) Osprey

The osprey nests in mature and old-growth timber and needs lakes, reservoirs and slow moving rivers for feeding habitat. Its unique set of habitat requirements is matched by only a few species, such as the bald eagle and wood duck, but the individual components of

its habitat support numerous other species. Suitable habitat for ospreys is suitable habitat for dozens of aquatic and terrestrial species.

Evaluation species were agreed upon by the resource agencies and the District at the July 15, 1986 meeting and agencies were provided with an opportunity to comment on the selection of evaluation species through mid-August, 1986.

18. Bald eagle mitigation benefit. Bald eagles would probably benefit from management measures for osprey and would benefit from old-growth management and snag creation elements. The forestry management measures along the Sultan River are designed with bald eagles in mind. To date, the bald eagle has not been included in the HEP or mitigation plan because of a FWS policy against the use of threatened or endangered species in HEP analyses. Additional measures for bald eagles could be included in the plan if trade-off mitigation credit is acceptable.

19. Buffer zones along watercourses and wetlands. Regarding widening of buffer strips along wetlands and streams, many of the streamside buffers are along drainage ways rather than major streams. Discussion of buffer strips on a case-by-case basis might be appropriate.

20a. A "Water Quality and Public Health Constraints" document was prepared as part of the mitigation planning process and will be an appendix to the final plan. The water quality document was intended primarily to guide wildlife mitigation planning so that proposed measures would be

E-93

consistent with protecting the quality of the City of Everett's and Town of Sultan's sources of municipal water supply. The key review agencies were expected to be the Washington Department of Social and Health Services and Snohomish County Health Department. However, copies of the document will be prepared for resource agency review and distributed as soon as practicable.

20b. A sketch map (Figure 1, attached) has been prepared which shows the proposed public access and use locations for the Project Facility Lands, Lost Lake and Lake Chaplain tracts. No specific additional limitations on public use/access are contemplated at this time for Spada Lake or Williamson creek tracts, except as covered by State laws and regulations for public health and safety. Hence, no map has been prepared for the remainder of the proposed mitigation lands.

E-94

20c. Plan development and implementation require flexibility, reflected by qualifying language describing proposed mitigation measures. While the Licensees can appreciate the reasoning behind the HDG request for further clarification and specificity concerning general statements about proposed prescriptive measures, it is impracticable to provide absolute specifications considering variability in the natural environment. The HSI values used in the HEP analysis were conservative and were developed with these potential variations in mind. A realistic plan has been presented which means some flexibility is required. The agencies have requested that the plan be flexible from their perspective. Therefore, the Licensees are confident that the agencies will accept some realistic flexibility in management plans and

proposals. The reporting/monitoring process will cover variations in actual management from that originally proposed. Licensee/agency meetings will be conducted to discuss these variations during plan implementation.

Attachments (2)

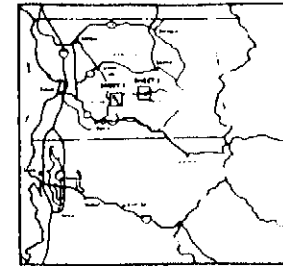
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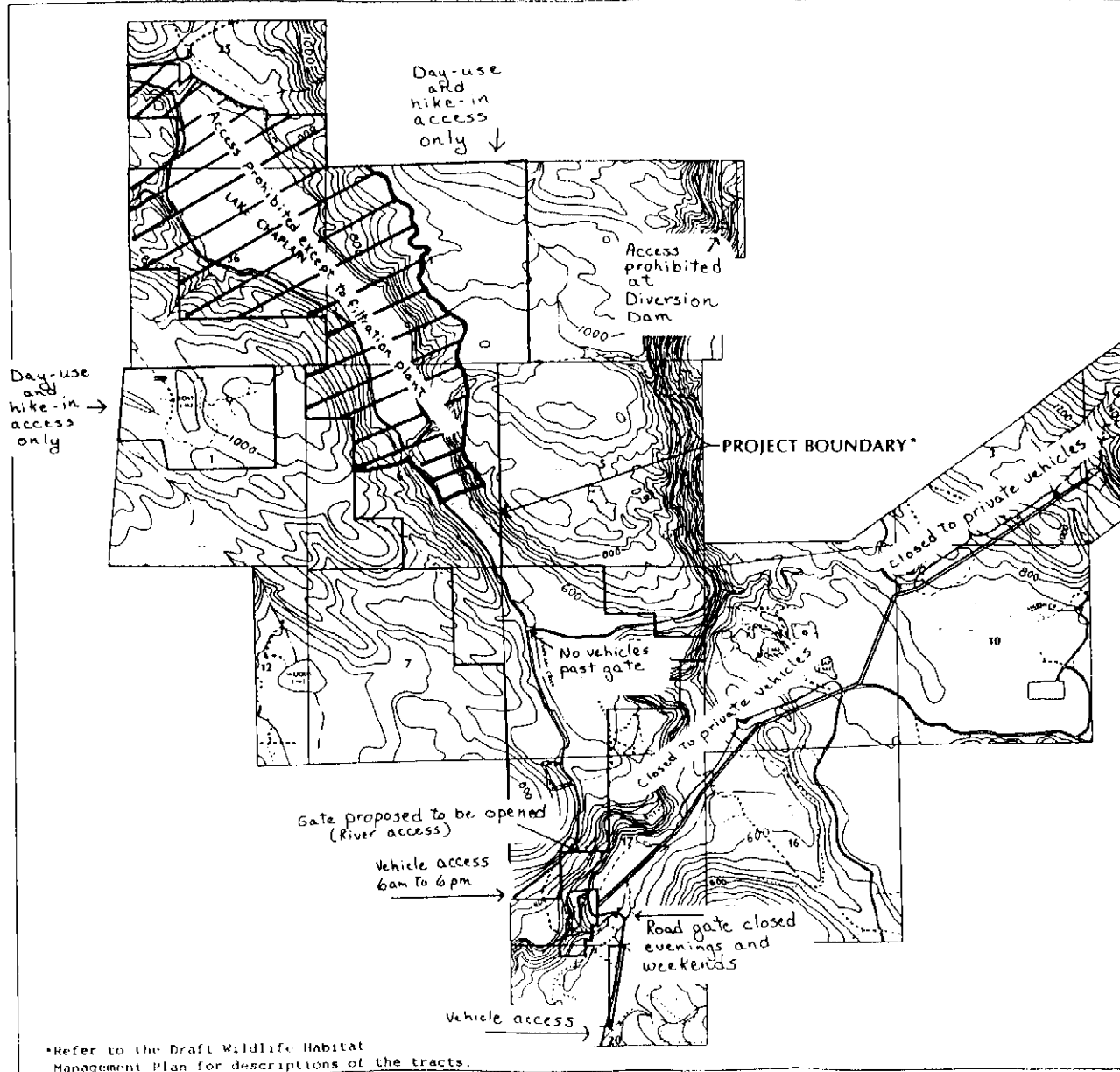
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²Represents Habitat Units attributed only to mature riparian forest.
³Represents Habitat Units attributed only to old-growth forest.
⁴Represents Habitat Units attributed only to wetland.

E-95



VICINITY MAP



E-96

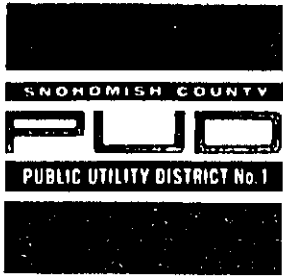
*Refer to the Draft Wildlife Habitat Management Plan for descriptions of the tracts.



0 1000 2000 3000
SCALE IN FEET

HENRY M. JACKSON HYDRO PROJECT
 FERC PROJECT NO. 2187
 PUBLIC UTILITY DISTRICT NO. 1
 OF SNOHOMISH COUNTY, WASHINGTON
**FIGURE 1
 WILDLIFE MANAGEMENT LANDS**

Proposed public access and use locations for Project Facility Lands, Lost Lake and Lake Chaplain Tracts.



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

June 18, 1987
 PUD-17412

Mr. Lawrence Waters
 Drinking Water Operations
 Dept. of Social and Health Services
 217 Pine St., Suite 220, B17-12
 Seattle, WA 98101-1549

Mr. Robert Pekich, Director
 Environmental Health Division
 Snohomish County Health District
 Courthouse
 Everett, WA 98201

Gentlemen:

**Jackson Project - FERC #2157
 Draft Wildlife Habitat Management Plan
 Water Quality and Public Health Constraints Document**

Enclosed is a copy of the Water Quality and Public Health Constraints Document which was prepared to guide wildlife mitigation planning for the Jackson Hydroelectric Project. This document will be an appendix to the Final Wildlife Habitat Management Plan. You are directed to page 1-1 of the enclosed document for background information. A draft final Wildlife Habitat Management Plan is scheduled to be submitted to you within the next few months pending further consultation with U.S. Fish and Wildlife Service, U.S. Forest Service, Washington Department of Game and the Tulalip Tribes.

If you have comments on the Water Quality and Public Health Constraints Document, please submit them to us by July 10, 1987. By copy of this letter, we are asking the resource agencies to submit their comments at that time also. Do not hesitate to call Roy Metzgar (347-4319) or Karen Bedrossian (347-4374) if you have questions or would like further explanation of the Constraints Document or Wildlife Habitat Management Plan.

Very truly yours,
 L. C. GRIMES
 L. Chet Grimes
 Manager, Generating Resources

Enclosure
 KLB:jk
 cc: C. Olivers, City of Everett
 R. Williams, USFS
 J. Potter, DNR
 D. Somers, Tulalip Tribes
 G. Engman, WDG
 G. Ging, USFWS

E-97



A. N. SIMPSON
 Secretary

STATE OF WASHINGTON
 DEPARTMENT OF SOCIAL AND HEALTH SERVICES
 217 Pine Street, Suite 220, B17-12 • Seattle, Washington 98101-1549

FMP 163-7
 17433

July 6, 1987

L. Chet Grimes
 Manager, Generating Resources
 Snohomish County PUD No. 1
 P.O. Box 1107
 Everett, Washington 98206

Subject: Jackson Project- FERC #2157 Draft
 Wildlife Habitat Management Plan
 Water Quality and Public Health
 Constraints Document

Dear Mr. Grimes:

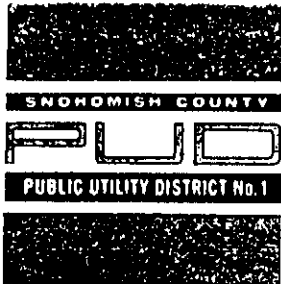
RECEIVED		
JACKSON PROJECT		
JUL 6 1987		
	Orig	& O
R. Schmitt		
C. Grimes		
H. Johnson		
R. Metzgar		
C. Lim		
D. Somers		
K. Bedrossian		
File		

Having reviewed the above document, I can offer the following:

1. I note the plan has been developed within the constraints of laws, policies, rules and regulations that generally, are outdated with respect to the current amendments to the Safe Drinking Water Act. In fact, they were pretty much written at a time when an heightened awareness of water quality, as it relates to watershed protection, was just beginning to develop. Given this shortcoming, I feel the proposal is workable and generally support its approach.
2. I look forward to seeing the Terrestrial Resource Management Plan.
3. To "not encourage wildlife" in certain areas--does that mean wildlife will be discouraged?
4. Is the term "avoid" synonymous with "prohibit" (see #3 Table 1-1, pg.1-7)?

I thank you for the opportunity to comment. I can be reached at 464-7673 or 464-6779 should the need arise.

Sincerely,
Lawrence W. Waters
 Lawrence W. Waters
 District Engineer
 NW Drinking Water Operations



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address P O Box 1107, Everett, Washington 98206
 July 10, 1987
 PUD-17438

*Attachment to
 Distrat letter of 7/10/87
 Page 1 of 20*

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
 AND
 CITY OF EVERETT, WASHINGTON

JACKSON PROJECT - FERC NO. 2157
 LICENSE ARTICLE 53
 TERRESTRIAL RESOURCE MITIGATION PLAN

Agency Meeting Summary

Mr. Gary Engman
 Washington Dept. of Game
 Region 4
 16018 Mill Creek Blvd.
 Mill Creek, WA 98012

Mr. Roger Williams
 District Ranger
 U.S. Forest Service
 Mt. Baker-Snoqualmie Nat'l Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Mr. Joe Potter
 Department of Natural Resources
 919 North Township
 Sedro Woolley, WA 98284

Mr. David Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. Charles A. Dunn
 Field Supervisor
 U.S. Fish & Wildlife Service
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
 Draft Wildlife Habitat Management Plan
Agency Meeting Summary

A summary is enclosed of the June 26 and 29, 1987 meetings held to discuss agencies comments to the Draft Wildlife Habitat Management Plan (February, 1987) and Licensees responses. If you have comments about the meeting or the meeting summary, please advise Karen Bedrossian at the July 22, 1987 meeting.

Our next meeting with you is on July 22, 1987, at the PUD offices in the Everett Business Park, Building A, Conference Room A, at 9:30 a.m.

Very truly yours,
 Original Signed By
 L. C. GRIMES
 L. Chet Grimes
 Manager, Generating Resources

Enclosure
 KLB:jk
 cc: C. Olivers, City of Everett
 G. Graves, City of Everett
 G. Ging, USFWS
 L. Heldon, USFS
 M. Vaughn, Beak Consultants
 D. Hays, Beak Consultants

Date: June 26, 1987
 Place: Public Utility District No. 1 of Snohomish County (District), Everett Business Park
 Attendees: Gary Engman - Washington Department of Game (WOG)
 Gwill Ging - U. S. Fish and Wildlife Service (USFWS)
 Leslie Weldon - U. S. Forest Service (USFS)
 Gary Graves - City of Everett (City)
 Roy Metzgar - District
 Karen Bedrossian - District
 Dave Hays - Beak Consultants, Inc. (Beak)
 Marty Vaughn - Beak Consultants, Inc. (Beak)
 Purpose: Discuss resource agency comments on Draft Wildlife Habitat Management Plan and Licensees responses with the goal of resolving most issues and identifying process to resolve others.

Bedrossian started the meeting by providing an update of planning status. Mitigation planning is currently on hold until some of the major issues can be resolved and a clear direction established towards finalizing a mitigation plan. Bedrossian presented a matrix system categorizing comments and responses as a method to do so (attachment). Discussion of agency comments and Licensee responses followed.

The following summary is organized by issue number as identified in the attached meeting handout. Bedrossian read the summary for each issue prior to discussion.

1) Public Use Activities with the Lake Chaplain Tract.

- Engman said that he did not remember if hunting was specifically mentioned in previous discussions concerning public access, but he could not imagine anyone proposing a wildlife mitigation plan without hunting. Given the WOG mission and the resources that were lost with the Project, hunting must be included. Recreational access was discussed and hunting is a large part of recreation. He reiterated that this is not a new issue.

E-98

- Bedrossian replied that hunting was not mentioned by the agencies during previous discussions on access and that the City's no hunting policy on the Lake Chaplain Tract did not surface until more recently in the planning process. She also stated that agency and FERC directives for wildlife mitigation emphasize wildlife habitat and do not mention hunting.
- Graves commented that the City controls the access to the watershed. Access is not allowed past the filtration plant and firearms are not allowed. The City is reluctant to sign a document providing access to the watershed, but unofficially hunting occurs.
- Metzgar stated that a City ordinance prohibits hunting within the City's incorporated limits (which includes the watershed), and that policy cannot be changed by staff. The City Council must do that. We need to look for ways to bring the issue to the City Council.
- Discussion continued with everyone re-stating their positions.
- Bedrossian suggested we look for potential compromises.
- Qing said he did not see any problem with a no-hunting buffer surrounding Lake Chaplain as long as it is not too big.
- Heldon stated that USFS often limits vehicle access to improve hunting quality and wondered if this would be similar.
- Metzgar stated that nothing had to be resolved today. We should discuss possible solutions and define things like buffers, etc. He referred everyone to the last page of the Licensees responses to the WDG's comments where a map showed the areas where access is prohibited.
- A general discussion continued regarding a controlled hunt.
- Vaughn discussed the controlled hunt on the Kapowsin tree farm owned by Champion Timber Company and noted that all costs and burdens for managing the special hunt are borne by the landowner. Engman and Heldon discussed the controlled hunt used in the City of Tacoma Green River watershed, in which the WDG plays a more active role.
- Metzgar reiterated that there is presently defacto hunting in the Lake Chaplain Tract. Then he referred people to the map provided and asked if everything outside of the no-access (cross-hatched) area was open to hunting. Would that be acceptable?
- Engman said that may be acceptable depending upon the size of the cross-hatched area.
- Concerns of the City of Everett were discussed and are related to water quality and safety, and include:
 - a) numbers of people in the watershed;
 - b) use of firearms (employee safety, chlorine tanks); and
 - c) wounded or dead animals or gut piles in and near the water.

- Discussion continued concerning the boundaries of the no-access area. Vaughn suggested that the boundary of the proposed old-growth management area on the east side of Lake Chaplain is similar to the no-access area boundary proposed by the Licensees. He also said that there will be a road near the border of the old-growth area and suggested that it be considered as a suitable boundary. Advantages to this boundary would be that it would be easily definable and acreages are known.
 - Engman said he will need a map defining the no-access/no-hunting boundary and the number of acres in the no-hunting zone.
 - Bedrossian summarized possible resolution of the public use (hunting) issue (comment numbers W102, W12, F9c and part of W20b) as follows:
 - 1) Establish a no-access/no-hunting area boundary to include the old-growth management area on the east and steep slopes along the west side of Lake Chaplain:
 - a. within that boundary no public access (including hunting) will be allowed.
 - b. outside the boundary, hunting as regulated by WDG and public use will be allowed.
 - c. new logging roads will be closed to vehicles.
 - d. no overnight camping will be allowed on the tract.
 - 2) Licensees will produce an adjusted map with a written summary for the agencies (see above and attached map).
 - 3) Qing, Engman, Heldon and Graves will take the proposal back to their supervisors.
 - 4) Vaughn estimated the total area (east and west of the lake) to be about 575 acres closed to hunting in the Lake Chaplain Tract. (Calculations based on the attached map indicate the no-access/no-hunting area to be 475 acres of land plus Lake Chaplain which is 441 surface acres.)
 - Engman asked about the type of hunting in the tract. Metzgar replied that no restrictions on the type of hunting will be made for now.
- Discussion concerning comment W20b - explicit locations, boundaries and seasons for public access:
- Bedrossian asked the resource agencies if the restrictions presented on the map (Licensees' Response to Agency Review Comments, June 16, 1987) were acceptable.
 - Qing asked why no vehicle access is allowed on the Diversion Dam Road. Metzgar responded that the gate is locked for private property owners. Public access was requested by the District from

E-99

them, but was denied. Improved access to the Sultan River for steelhead fishermen has been provided by new DNR logging roads. The District is proposing to help maintain these roads for public use after logging is done and the roads would either be closed or allowed to deteriorate.

- Metzgar also pointed out closure to vehicles of two sections of the pipeline right-of-way to facilitate plantings and establishment of vegetation along the right-of-way. There was no agency objection.
- Access to Lost Lake was discussed. Bedrossian repeated that day-use/hike-in only has been the proposed access/constraint for the Lost Lake Tract all along and was concerned by an earlier comment of Engman's that hike-in access only might not be acceptable. Engman said this issue was not resolved internally in WDG and wondered when Bedrossian needed an answer. Bedrossian stated that if there was a problem with access as proposed, it should be resolved as soon as possible. Metzgar responded that vehicle access was really a recreation issue and should not be part of the wildlife plan. Engman wanted to know if WDG would be allowed vehicle access for potential fisheries purposes. Metzgar assured Engman that WDG would be allowed vehicle access.
- Following further discussion, it was agreed that the access map as presented was acceptable with the exception of the Lake Chaplain Tract as discussed previously.

2) Amount of Mitigation for Priority Habitat (old-growth, wetland, and riparian)

- Bedrossian stated that the agency comments focused on acres and ignored HEP and the concept of changes in habitat over time.
- Ging asked if the agencies demanded HEP? Bedrossian reminded the agencies that Licensees' attempts to use another method to assess mitigation value were rejected because WDG did not want to set a precedent of not using HEP. Engman stated that WDG wanted mitigation value to be measured in terms of HU's to be consistent with the approach used in the WDG impact assessment.
- There was general discussion on the subject of priority habitat mitigation. Engman suggested that further discussion of this issue be postponed and discussion move to Issue 3, adequacy of mitigation for deer, grouse and chickadee. All parties agreed.
- Later in the meeting when discussion returned to Issue 2 (adequacy of mitigation for priority habitat), Ging responded to Bedrossian's questioning of comment F73 requesting more old-growth by stating that given a better understanding of the old-growth mitigation presented in the Plan, he did not expect to obtain more.

3) Adequacy of Mitigation for Black-tailed Deer, Ruffed Grouse and Black-capped Chickadee

- Ging asked if the pre-commercial thinning was for wildlife of timber.
- Vaughn responded that the pre-commercial thinning is for wildlife not timber. Thinning is done early in the rotation to prolong the shrub stage and avoid heavy slash accumulation. Planting densities will also be the minimum necessary to comply with Forest Practice Laws, so that thinning will be minimized, thereby reducing slash.
- Ging asked why it was not proposed to keep mixed and deciduous forest at Lost Lake, since it has high value in the HEP analysis.
- Vaughn said that it could be maintained as mixed forest and not converted to coniferous forest. Mixed forest was not kept because it was not a priority habitat. The reason it has high value at Lost Lake is because of the interspersed created by cutting, so some cutting will be necessary to realize the high HSI scores shown in the HEP report. Management of Lost Lake as mixed forest was not resolved at this point.
- Following further discussion, it was agreed that the issues presented in comment numbers F6 and F75 regarding forestry management would be resolved if the Licensees provided a summary of the value of the 60-year forestry rotation plan (will be provided at July 22, 1987 meeting) and if the areas of mature deciduous forest currently on the Lake Chaplain Tract (303 acres) were not actively converted to coniferous forest.

4) Mitigation Trade-Offs

- Ging stated that trade-offs in general are acceptable. USFWS will want more than 100% mitigation for old-growth and are willing to trade-off for that. Old-growth is preferable to 100% mitigation for each evaluation species if all reasonable mitigation for the evaluation species is attempted.
- Bedrossian summarized comments M8, F3 and F8 regarding reservoir benefited species and asked if the agencies would consider trading Habitat Units (HU's) for species that benefited from the Project, such as osprey and mallard, against HU's lost for species such as the deer, chickadee and grouse.
- Ging stated that USFWS is open but not receptive to considering trade-offs for reservoir benefited species until the Licensees have shown that they have made a reasonable effort to mitigate in full for all evaluation species that lost habitat as a result of the Project. If full mitigation cannot be achieved after a reasonable effort has been made, trade-offs will be reconsidered. Ging and Engman commented that the habitat benefits predicted for osprey are somewhat speculative and osprey may never use Spada Lake. They would be reluctant to trade these HU's for HU's lost for deer.

grouse, chickadee and the several other species that they represent. They would like to see how the Plan works out, and might consider such a trade-off as part of the whole package.

- Vaughn noted that even with the maximum possible effort, the lands presently in consideration could not provide 100% mitigation for all evaluation species.
- Bedrossian asked about credit for measures not included in the HEP analysis (W14, F11) such as the planting program proposed for Spada Lake, waterfowl nest boxes, and raptor perch poles.
- Vaughn explained briefly what is being proposed in the way of shoreline plantings and tests at Spada.
- Ging again responded that he would look at this as part of the overall package being proposed by the District, and could not commit to specific HEP credit now. He does not consider the measures not included in the HEP to have high priority. He said that the "overall package" included items like using a 95-year period of analysis rather than a 45-year period. The USFWS acceptance of the 95-year period may require no trade-offs in the HEP analysis.
- Bedrossian asked if bonus credit for Williamson Creek would be acceptable to the agencies (F11) in light of the fact that more than 100% mitigation for old-growth would be provided in the Plan. Ging said that some bonus credit would be acceptable.
- Bedrossian mentioned that wetland development at Lake Chaplain Tract may be dropped from the Plan because full wetland mitigation can be provided without it.
- Vaughn asked if the agencies thought the Plan was anywhere near being acceptable, or did they think there was the need for more land.
- Engman responded that he is waiting to see if more land is available for mitigation.
- Engman clarified his written comment about bald eagles benefiting from mitigation measures (W18). He thought eagles might actually benefit more from the osprey mitigation than ospreys would because eagles are known to use the Spada Lake area. He recognized that eagles are not included in mitigation plans as a matter of policy (because of their federal status) but wondered if something couldn't be done for eagles as part of the Plan.
- Bedrossian responded that inclusion of measures to enhance bald eagle habitat in the Plan would be dependent on trade-off credit, both for bald eagles and osprey since osprey improvement measures will be removed from the plan if trade-off credit is not considered acceptable.

5) Duration of Mitigation Plan (W3, W4, and F2)

- Ging stated that normally the USFWS only agrees to mitigation plans for the life of the license period. The impacts occurred in a short time frame, so mitigation should occur in a shorter time frame.
- Bedrossian stated that the 95-year period of analysis was agreed upon at the July 15, 1986 meeting. A 45-year plan would actually be completed in 2010, only 23 years from now. This is a very short time period with which to successfully mitigate.
- Engman, Ging and Weldon caucused on this issue.
- When the meeting resumed, Ging stated that he, Engman and Weldon agreed to the 95-year period of analysis conditional to their agreement on the rest of the plan and satisfactory resolution of questions and comments, including factors other than HEP.

6) Overall Sufficiency of Proposed Mitigation

- Vaughn responded to the written comments about vague language in the Plan (W20c, F10). He said that statements like "whenever possible" appeared for two reasons: 1) because of limited information available at the time of the first draft, and 2) to allow for needed flexibility when implementing the Plan. Those due to the former will be eliminated in the next draft. The rest will remain because the flexibility is essential to successful implementation of the Plan.
- Ging asked for more detail in the Plan on methods and techniques. He wondered, for example, how many snags/acre would be created.
- Vaughn directed Ging to the appendices and asked that he make note of any particularly vague areas that needed improvement.
- Both Engman and Ging stated that the proposed HSI values for the mitigation measures appeared feasible and reasonable (F10, W13).
- Regarding the technical merit of proposed measures (W9), Engman stated that he could not pin-point any particular problems.
- Regarding the issue of providing adequate mitigation, Engman said he would like to see more land included in the Plan to provide more habitat, specifically for deer, grouse and chickadee.
- Ging said he was not asking for more land now, but would like to see the "whole package" and he would decide then if more land is needed.
- Metzgar said that additional lands may become available around Spada Lake as part of a land trade between the Forest Service and DNR, and those could potentially be considered for wildlife mitigation. He cautioned, however, that the trade could take a long time and there could be legal complications that would preclude the use of the lands for mitigation.

- Ging suggested that the traded lands be managed for the species that have not been mitigated 100 percent.
- Metzgar stated again that he didn't feel sure that the traded lands would be available. If he does find more acreage, he said he would like to by-pass HEP field work and use existing scores from similar habitats to rate the lands.
- Bedrossian discussed the upcoming request for an extension from FERC. It was agreed that a three-month extension should be requested; however, Engman suggested that an attempt to complete the plan by November 21 was optimistic.
- Bedrossian reminded everyone of the next meeting scheduled for July 22, 1987, at the Everett Business Park, at 9:30 a.m.. In addition, another meeting was scheduled for August 6, 1987, at MDG offices in Mill Creek at 9:30 a.m. It was agreed that this meeting (June 26) would be continued on June 29 with Ging participating by phone and Weldon absent, but with the option of her supervisor attending.

- MONDAY, JUNE 29, 1987 -

CONTINUATION OF JACKSON PROJECT MEETING

Attendees: Gary Engman - (WDG)
 Gwill Ging - USFWS (via telephone)
 Gary Graves - City of Everett
 Roy Metzgar - District
 Karen Bedrossian - District
 Dave Hays - Beak
 Marty Vaughn - Beak

A discussion of the June 26 meeting summarized items discussed and progress made.

7) Monitoring

- Bedrossian asked for concurrence among the agencies that the monitoring plan should be designed to evaluate habitat with some observational studies of use and general trends, not wildlife population studies.
- Ging concurred, but said he wants monitoring frequent enough to make sure that the enhancement measures are working.
- Engman also concurred but said he would like to see an extra monitoring emphasis early in implementation to make sure we are on track. He would also like clarification of the specifics of the

monitoring plan before he concurs with it. It was agreed that once the overall mitigation plan is established, the monitoring program will be developed and presented to the agencies for review.

8) Miscellaneous

Comment W15 - Term "Management lands" is confusing in the plan since it includes reservoir acres:

- It was agreed that wording in the plan will be changed to clarify this point.

Comment W16 - Years to Full Implementation:

- Bedrossian explained that the first phase of the plan runs through 1995, but that implementation will occur throughout the life of the mitigation plan.
- Ging requested a detailed summary schedule with a time-line for activities.
- Bedrossian and Vaughn informed him that a detailed summary schedule was planned and would be included in the Draft Final Plan.

Comment W17 - Evaluation Species:

- Engman said that he was particularly interested in osprey when he asked the question and that the question was answered in the PUD's response.

Comment W19, F7₂ - Size of Buffers:

- Bedrossian explained that many of the stream buffers included in the Plan are along intermittent streams. She asked if Lost Lake was the main concern.
- Ging said initially Lost Lake was the concern. He asked if there were areas where Beak thought that buffers should be larger.
- Hays replied that a 200-ft. buffer will be proposed adjacent to one wetland northwest of Lake Chaplain because of the presence of a major deer trail and 200-300 ft. will be proposed east of Chaplain Creek March where wetland development was originally proposed.
- Vaughn and Hays suggested revising the plan to provide 200-ft. buffers around all the wetlands, and improve language in the plan concerning protection of wetland buffers.
- Engman said he would like to discuss this with the WDG specialist on wetlands and wetland buffers. (Engman followed up by telephone to Bedrossian on July 30, 1987, and said that WDG would like to see 200-ft. buffers around wetlands, 100 ft. on either side of major streams and 50 ft. on either side of intermittent or non fish-bearing streams).

E-102

- Ging said he would like to see a map in the plan showing where these streams are.
- Vaughn said a stream map will be included in the Final Draft.

Comment W20a - Water Quality:

- Bedrossian reminded the agencies that the Water Quality Constraints Document had been sent to them and that comments were requested by July 10, 1987.

Comment F1 - Explanation of HEP:

- Bedrossian suggested that more explanation be included in the Plan concerning how the HEP was performed.
- Vaughn suggested more narrative in the HEP report and leave it out of the Plan.
- Ging said that the Plan needs to summarize the HEP because it was an atypical HEP. He asked that some of the history of the Project and why the HEP was structured the way it was be included in the Plan.
- Vaughn said he will add more about the HEP to the background section of the Plan.

Comment F74 - Planting:

- Ging suggested wording be added to the Plan concerning planting of hardwoods and techniques used to promote hardwoods. Vaughn and Hays agreed.
- Vaughn said he will develop a revised management plan for Lost Lake to provide more mixed forest.

Comments Fo1, Fo2 - Forest Service Comments:

- All were in agreement that the Licensees responses to these questions were sufficient.
- Bedrossian said that additions would be made to the Plan discussing updating procedures and Plan dynamics.

Comment Fo5 - Land Exchange:

- Metzgar said approximately 1500 acres of upland would be involved in the exchange around Spada Lake. Land would be split between the District, the City of Everett and the DNR. As a general rule, the City and the District would take the lands within the road system around Spada Lake. The lands in the canyon below Culmback Dam to the Diversion Dam are also available but no one has expressed interest in them.

- Ging asked about the land exchange between the City of Everett and the DNR.
- Metzgar explained that the City will acquire approximately 200 additional acres and these acres could be included in the Plan. Land which may be traded to DNR that was included in the Plan will be replaced with land the City obtains in trade.
- Vaughn estimated that inclusion of an additional 200 acres at Lake Chaplain might provide 50 HU's each for deer, black-capped chickadee and ruffed grouse. Hays said that the City will gain some wetland acreage at the north end of Lost Lake with the exchange.

Meeting Conclusion

- Bedrossian asked "Where do we go from here?" Can we trade HU credit or should we look at changing the Plan to provide 100% mitigation for all evaluation species. She said the District's position is that they won't exceed 100% mitigation (204% mitigation for old-growth is currently in Draft Plan) if trading of HU credit is not allowed.
- Ging said he hoped that the District will be flexible on the old-growth issue because harvest assumptions at Lake Chaplain without mitigation are questionable given water quality concerns. He reiterated his policy of accepting a reasonable attempt at 100% mitigation for the evaluation species.
- Engman said he can't say now how much land is needed to make up deficiencies for the three species. He reiterated his position that he wanted to avoid trade-offs.
- Metzgar concluded by saying he hopes we can wrap things up in the next meeting, July 22, 1987.

E-103

JACKSON PROJECT - FERC #2157
WILDLIFE MITIGATION PLAN - A-6 MEETING/WORKSHOP
June 26, 1987

A G E N D A

- I. Purpose of Meeting
- II. Wildlife Mitigation Planning - Update
- III. Approach to Resolving Differences/Establishing Clear Direction to Plan Completion
- IV. Discussion of Comments/Responses
- V. Summary
- VI. Next Meetings:
July 22, 1987 (9:00 a.m. Everett Business Park)
Schedule August Meeting

E-104

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Categorization of Agency Comments on
Draft Wildlife Habitat Management Plan

	Communication	Technical	New Issue	Policy
1. Public Use	W10 ₂ W12 F9c W20b		W10 ₂ W12 F9c	W10 ₂ W12 F9c
2. Amount of Mitigation for Priority Habitat	W7 W16 F7 ₁ F7 ₃	W7 W16 F7 ₁ F7 ₃		
3. Adequacy of Mitigation for black-tailed deer, ruffed grouse & black-capped chickadee	W2 W8 F6 F7 ₅ F8	W2 W8 F6 F7 ₅ F8		W2 W8 F6
4. Mitigation Trade-offs	W2 W8 W14 W18 F3 F7 ₁ F7 ₃ F8 F11	W2 W8 W14 W18 F3 F7 ₁ F7 ₃ F8 F11		W2 W8 W14 W18 F3 F7 ₁ F7 ₃ F8 F11
5. Duration of Plan	W3 W4 F2	W4 F2	W4 F2	W4 F2
6. Overall Sufficiency	W1 W2 W6 W20c F10	W1 W2 W6 W9 W10 ₁ W11 W13		W1 W2 W10 ₁ W11
7. Monitoring	W5 Fo3 Fo4	W5 Fo3 Fo4		
8. Miscellaneous	W15 W16 W17 W19 W20a F1 F4 F5 F7 ₂ F7 ₄ F9a&b F12 Fo1 Fo2 Fo5	W19 F7 ₂		

W = Washington Department of Game
F = Fish and Wildlife Service
Fo = Forest Service

0505T

Summary of Agencies' Comments on the Draft
Wildlife Management Plan and Licensees' Responses

1. Public Use Activities With the Lake Chaplain Tract

Agencies' Comments:

- Complete exclusion of hunting makes Lake Chaplain tract ineligible
 - a. Lake Chaplain tract constitutes 73% of mitigation lands
 - b. breach of good faith consultation/additional project impact
 - c. WDG mission to provide direct recreational benefit
 - d. obligation to mitigate loss of hunting
- Clarify locations, boundaries and seasons for vehicle and pedestrian access

Licensees' Responses:

- Access addressed in March, 1986 letter to WDG and FWS
- Hunting mitigation requirement not mentioned by agencies until March, 1987 - not a breach of good faith and not additional impact
- Difference between access/recreation and hunting
- Project has provided increased recreational opportunities in Sultan Basin - access and fishing
- Proportion of area removed from hunting 1,870 ac. out of 44,160 ac. behind dam
- Non-consumptive recreational uses allowed
- License Article 44 already addressed access issue
- Cost of filtration increases
- WDG accept liability?
- Prior to rejecting Lake Chaplain, note that other available land in basin is scarce
- Sketch map of access provided

2. Amount of Mitigation for Priority Habitat (old growth, wetland and riparian)

Agencies' Comments:

- Only 28% of managed lands contain priority habitats - increase proportion of priority habitats, particularly old growth (M7 and M16)
- Create more wetlands (9 acres proposed, 25 lost), allow more coniferous forest to become old growth (F7₁ and F7₃)

Licensees' Responses:

- Required to use HEP to evaluate impacts and mitigation plan - used special HEP to evaluate priority habitats
- HEP looks at impacts vs w/o project conditions overtime
- Old growth would have been cut eventually - HEP indicates old growth mitigated 204%
- HEP indicates wetlands mitigated 143%
- Additional old growth or wetlands would only be considered if trade-off mitigation is acceptable

3. Adequacy of Mitigation for black-tailed deer, ruffed grouse and black-capped chickadee

Agencies' Comments:

- Proposed mitigation not enough for species represented by black-tailed deer, rough grouse and black-capped chickadee
- Question wildlife habitat as primary objective over timber management (F6)
- Request more than 60 year rotation on second growth mitigation lands (F7₅)

Licensees' Responses:

- Cover types most used by these species (early-mid successional) not considered high priority by the resource agencies - plan development focused on high priority habitats
- Losses for three species mitigated 69, 82 and 56% respectively

E-105

- Other species (representing high priority habitats) mitigated more than 100%
- Assumed trade-off for species representing high priority habitats acceptable
- Modifications of plan to increase value to these three species will reduce value of plan for old growth and wetland species
- Need direction from agencies on preference: mitigate 100% for all evaluation species or give preference to high priority habitats
- Wildlife habitat was primary objective of plan (F6)
 - a. small harvest units
 - b. low replanting density
 - c. only 65% tract second growth
 - d. timber profits significantly reduced under mitigation plan/timber would be cut according to existing timber plan if mitigation not implemented at Lake Chaplain
 - e. harvest on 60 year rotation, harvest unit size, spacing of cuts and specific stand prescriptions proposed for black-tailed deer and ruffed grouse (F73)
- Longer than 60 year rotation would reduce value of plan for black-tailed deer, ruffed grouse and black-capped chickadee

4. Mitigation Trade-Offs

Agencies' Comments:

- Trade-off for "reservoir benefited" species not acceptable (osprey, mallard, common merganser, beaver) (W8, F3, F8)
- Measures not included in HEP rating unclear - will determine if trade-off credit acceptable upon clarification (W14, F11)
- Expressed interest in bald eagle mitigation (W18)
- Trade-offs not acceptable until agreement reached that individual evaluation species' losses can't be mitigated 100% (F3)

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- Request additional wetland mitigation (F71)
- Request additional old growth (F73)
- Bonus credit for Williamson Creek tract not acceptable because needed for old growth mitigation (F11)

Licensees' Responses:

- Assumed trade-off credit for old growth and wetland habitat/species acceptable
- Request clarification from agencies on preference: mitigate 100% for all evaluation species or give preference to high priority habitats (W8)
- Management measures not included in HEP include waterfowl nest boxes, raptor perch pole and Spada Lake shoreline planting program. If no credit given, will be removed from plan (W14)
- Bald eagles benefited by plan. Additional measures would require acceptability of trade-off mitigation.
- Assumed trade-off credit would be acceptable for high priority species such as osprey or those representing wetlands such as waterfowl and beaver (F3)
- Old growth mitigated by 204%, therefore, entire Williamson Creek tract not essential to plan. Trade-off credit must be acceptable and in proportion to high cost of Williamson Creek tract or entire tract will not be included in plan (F11)

5. Duration of Mitigation Plan

Agencies' Comments:

- Clarification of plan time frame requested (W3)
- Consultation requested on duration of plan
- 95 year period of analysis questioned
- Essential for period of analysis to parallel license period because of uncertainty of plan beyond initial license period (F2)

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E-106

Licensees' Responses:

- Provided clarification - mitigation plan runs from 1988 - 2060 - HEP analysis runs from 1960 - 2060 (W3)
- More wildlife benefits from long-term plan (consistent and comprehensive program, resource base assured)
- Duration of plan was agreed upon in July, 1986 - mitigation plan based on that agreement
- Mitigation plan would have to be rewritten for plan paralleling license period
- Mitigation plan duration can be set to 2060 by FERC (F2)

6. Overall Sufficiency of Proposed Mitigation

Agencies' Comments:

- Initial plan does not achieve full mitigation
- Need for more intensive and wildlife specific measures on more land
- HDG deferred comment on technical merit of proposed measures (W9) and proposed HSI values (W13)
- HSI values acceptable (F10)
- Concern regarding qualifying phrases (W20c, F10)

Licensees' Responses:

- Plan as presented mitigates over 100% for all but three of ten evaluation species
- Adjusting plan to mitigate 100% for all species will reduce mitigation for evaluation species representing old growth and wetland
- Trade-off mitigation for species representing priority habitats should be acceptable
- Deferral of comments on technical merit of proposed measures and proposed HSI values is not acceptable because it holds up the plan development process or if plan development proceeds, it would be costly and cause even greater delays if problems are identified later (W9 and W13).

- Qualifying phrases such as "when possible" are necessary because of variability in the natural environment. HEP scores were conservative to reflect these potential variations. Report process and monitoring during implementation will address variations.

7. Monitoring

Agencies' Comments:

- In addition to observation and measurement of physical features, monitoring plan needs to include factors that will measure wildlife response.
- Consider monitoring of wildlife trees every five years (Fo4).

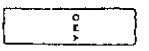
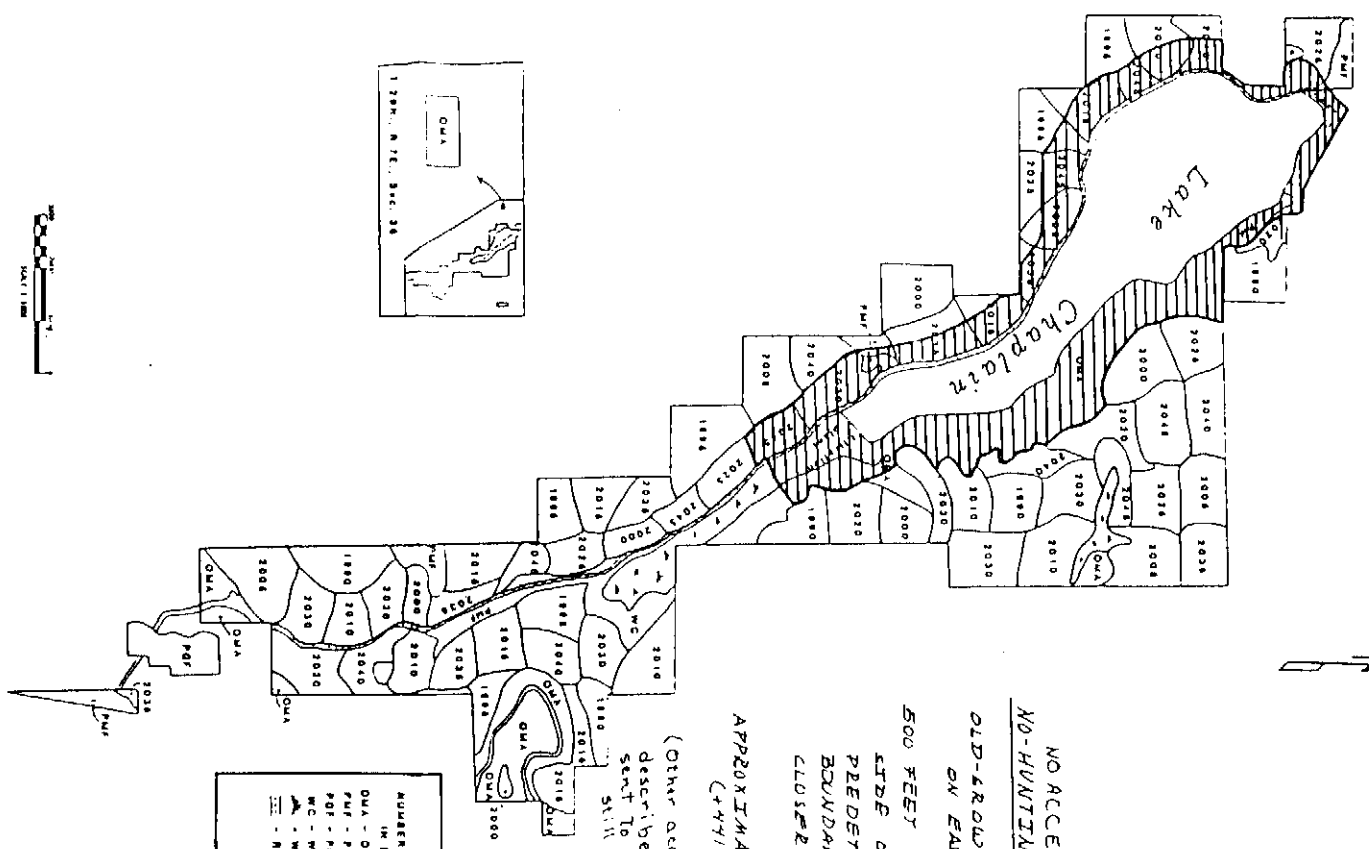
Licensees' Responses:

- Monitoring program will be revised once basic mitigation measures agreed upon.
- Prefer measuring habitat response since wildlife data may be affected by many factors other than program implementation.
- Wildlife tree monitoring period will be re-evaluated.

8. Miscellaneous

Discuss by comment: W15, W16, W17, W19 & F72, W20a, F1, F7a, F9a&b, Fo1, Fo2, Fo5

10 July 1987



NO ACCESS/
 NO-HUNTING BUFFER
 OLD-GROWTH MANAGEMENT AREA
 ON EAST SIDE OF LAKE
 500 FEET FROM LAKE ON WEST
 SIDE OF LAKE, EXCEPT WHERE
 PREDETERMINED CUTTING UNIT
 BOUNDARIES ARE SLIGHTLY
 CLOSER OR FARTHER

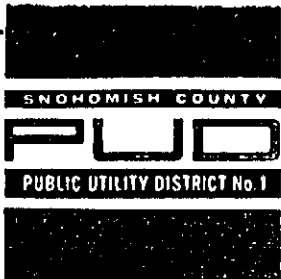
APPROXIMATE AREA = 475 ac.
 (+44/ ac. lake)

(Other access restrictions as
 described on sketch map
 sent to agencies on June 16, 1987
 still apply)

LEGEND
 NUMBERS IN UNITS REFER TO YEAR OF HARVEST AS STATED
 IN DETAILED MANAGEMENT PRESCRIPTIONS
 OMA - OLD-GROWTH MANAGEMENT AREA WITH NO CUTTING
 PMF - PERMANENT MISED FOREST WITH NO CUTTING
 POF - PERMANENT WISED FOREST WITH NO CUTTING
 MC - PERMANENT GRASS/ORB AREA
 WC - WETLAND CONVERSION
 W - WETLAND
 --- - ROAD

HENRY M. JACKSON PROJECT FERC NO. 2191
 PUBLIC UTILITY DISTRICT NO. 1
 OF SNOHOMISH COUNTY, WASHINGTON
 FIGURE 5
 TIMBER HARVEST SCHEDULE FOR
 LAKE CHAPLAIN TRACT AND PROJECT LAYOBS

DRAFT



2320 California St., Everett, Washington 98201 258-8211
Mailing Address P. O. Box 1107, Everett, Washington 98206

July 24, 1987
PUD-17454

Mr. Gary Engman
Washington Dept. of Game
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Ms. Leslie Weldon
U. S. Forest Service
North Bend District
42404 S.E. North Bend Way
North Bend, WA 98045

Mr. Gwill Ging
U. S. Fish & Wildlife
2625 Parkmont Lane N.W.
Olympia, WA 98502

Mr. Gary Graves
City of Everett
Water Filtration Plant
3200 Cedar St.
Everett, WA 98201

Gentlemen:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Public Use Issue
Maps and Acreages

E-109 Enclosed are the maps and acreage estimates requested at the July 22, 1987 agency consultation meeting. As you will recall, it was agreed that the City of Everett and the agencies will use the large topographic map to designate acceptable boundaries for public access and hunting. It would be helpful if you would also calculate acreages. In the interest of resolving the public access issue at Lake Chaplain prior to a FERC submittal, I urge all of you to have this information completed and ready for discussion at the August 6 meeting. It is essential that we all understand each others positions on this issue so that we can establish where the differences might be and what compromises or changes might be necessary to solve the problem.

Thank you for your cooperation.

Very truly yours,

Original signed by
L. C. GRIMES
L. Chet Grimes
Manager, Generating Resources

Enclosures
KLB:jk

cc: C. Olivers, City of Everett (w/o enclosures)
J. Potter, DNR (w/o enclosures)
C. Dunn, USFWS (w/o enclosures)
D. Somers, Tulalip Tribes (with enclosures)

Acreages of Proposed Public Use and Hunting Areas in Lake Chaplain Tract

A. Total Upland Acreage of
Lake Chaplain Tract ¹ = 2,027 ac.

B. Upland Acreage Within Cross-hatched
Buffer Around Lake Chaplain
(No Public Access Area) = 762 ac.

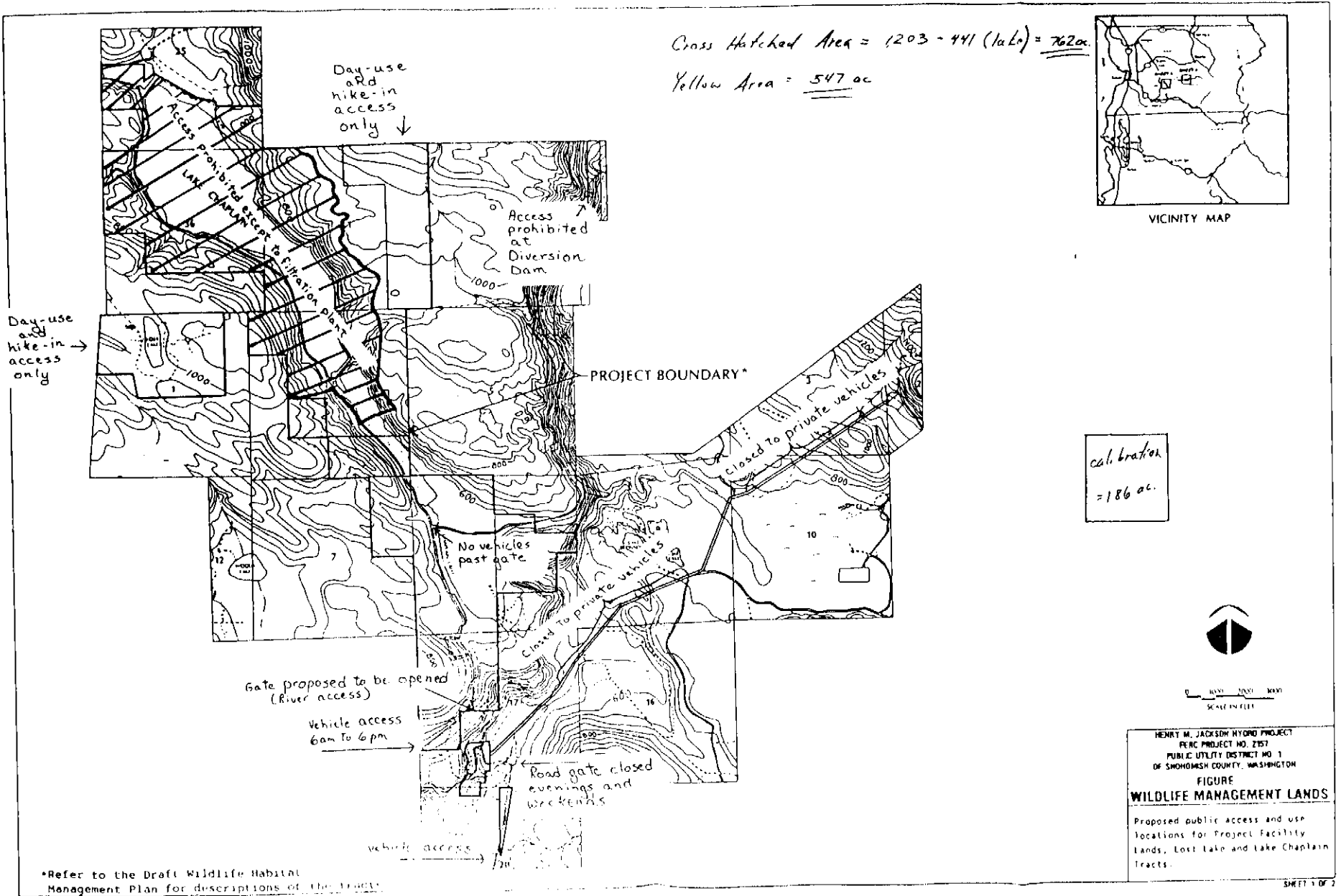
C. Area Potentially Open To Public
(A-B) = 1,265 ac.

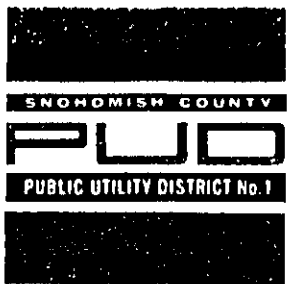
D. Area Identified by City on 7/22/87
As Potential Hunting (shaded yellow) = 547 ac.

¹ Acreage under Plan 1. Does not reflect
possible changes from land exchange

All acreages Approximate and Based Upon Hand-drawn
Maps

E-110





2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206
 August 5, 1987
 PUD-17466

Mr. Gary Engman
 Washington Dept. of Game
 Region 4
 16018 Mill Creek Blvd.
 Mill Creek, WA 98012

Mr. Roger Williams
 District Ranger
 U.S. Forest Service
 Mt. Baker-Snoqualmie Nat'l Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Mr. Joe Potter
 Department of Natural Resources
 919 North Township
 Sedro Woolley, WA 98284

Mr. David Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. Charles A. Dunn
 Field Supervisor
 U.S. Fish & Wildlife Service
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
 Draft Wildlife Habitat Management Plan
Agency Meeting Summary

A summary is enclosed of the July 22, 1987 meeting held to discuss a revised mitigation plan package prepared in response to agencies' comments to the Draft Wildlife Habitat Management Plan (February, 1987) and previous consultations. Other issues related to the wildlife mitigation plan were discussed in an effort to reach consensus on the content of a final plan. If you have comments about the meeting or the meeting summary, please advise Karen Bedrossian prior to the September 3, 1987 meeting.

Our next meetings with you will be on August 6 and September 3, 1987, at the Washington Department of Wildlife offices in Mill Creek at 9:30 a.m.

Very truly yours,
 Original Signed By
 L. C. GRIMES
 L. Chet Grimes
 Manager, Generating Resources

Enclosure
 KLB:jk

cc: C. Olivers, City of Everett
 G. Graves, City of Everett
 M. Vaughn, Beak Consultants

G. Ging, USFWS
 L. Weldon, USFS
 D. Hays, Beak Consultants

Attachment to
 District letter of
 8/5/87
 Page 1 of 22

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
 AND
 CITY OF EVERETT, WASHINGTON

JACKSON PROJECT - FERC NO. 2157
 LICENSE ARTICLE 53
 TERRESTRIAL RESOURCE MITIGATION PLAN

Agency Meeting Summary

Date: July 22, 1987
 Place: Public Utility District No. 1 of Snohomish County (District),
 Everett Business Park
 Attendees: Gary Engman - Washington Department of Game (WDG)
 Gwill Ging - U. S. Fish and Wildlife Service (USFWS)
 Leslie Weldon - U. S. Forest Service (USFS)
 Gary Graves - City of Everett (City)
 Roy Metzgar - District
 Karen Bedrossian - District
 Dave Hays - Beak Consultants, Inc. (Beak)
 Marty Vaughn - Beak Consultants, Inc. (Beak)

I. Purpose: Present and discuss a wildlife mitigation package (Plan 2) prepared in response to agency correspondence and consultations, and resolve issues in an effort to advance the planning process toward a final plan (see agenda - Attachment 1).

II. Wildlife Mitigation Planning - Update:

Bedrossian started the meeting by stating the purpose and reviewing briefly the progress that had been made since the previous meeting. She made the following key points:

- Metzgar and Bedrossian are scheduled to present the Draft Plan to the District Commissioners on Tuesday, August 11, 1987. The agencies were invited to attend. It is Metzgar's and Bedrossian's desire to have as much of the Plan as possible resolved with the agencies prior to the August 11 meeting. (The presentation to the Commission has been re-scheduled to August 25, 1987.)
- Comments had been received from WDG, USFS and the State Department of Social and Health Services on the Water Quality Constraints Document. Most of the comments dealt with specific points in the document and did not appear to have any impact on the overall Draft Wildlife Habitat Management Plan. The USFS noted that they do not consider Spada Lake as being under the jurisdiction of the State

Shorelines Management Act, even though the County does. Bedrossian noted that the Draft Plan will comply with the Shorelines Act anyway and the baseline conditions used for the HEP were not affected by this so there will be no problem or need to resolve this issue in the context of the wildlife mitigation plan.

• Bedrossian handed out the matrix categorizing agency comments on the Draft Wildlife Habitat Management Plan (Attachment 2) and reviewed progress made on resolving agency concerns.

- 1) The issue of public hunting in the Lake Chaplain watershed is not resolved yet and Bedrossian expressed a desire to make some headway at this meeting.
- 2,3,4 & 6) The amount of priority habitat dedicated to mitigation, adequacy of mitigation for deer, grouse and chickadee, acceptability of trade-offs and overall sufficiency of the Plan, are tied together and will all be covered in this meeting under the Plan 2 package discussion and the 60-year forestry rotation explanation which was distributed (Attachment 3).
- 5) It was resolved in the last meeting that the duration of the mitigation plan will be to year 2060 (95 year analysis period) subject to the overall acceptability of the rest of the plan to the agencies.
- 7) A detailed monitoring program will be prepared and presented to the agencies after the specifics of the Management Plan are worked out. Bedrossian stated her understanding that the monitoring program will include measures to ensure the Plan is being carried out, and evaluation of habitat with some observational studies of use and general trends. There will be no wildlife population studies or monitoring. Engman and Ging agreed.
- 8) The final unresolved item from the last meeting was that of buffer widths, which will be covered in this meeting under Plan 2.

E-112

III. Public Use at Lake Chaplain Tract:

Bedrossian reviewed the discussion from the July 22, 1987 consultation meeting.

Heldon clarified the USFS position by saying that their primary concern is with road closures. The USFS will want to be involved in coordinating road closures for restricting hunting access, particularly if the closures effect access to USFS-administered lands.

Engman asked if the cross-hatched map presented at the last meeting was a formal proposal by the City.

Metzgar responded that it was a staff-level, working proposal for the agencies to review. If it looks acceptable to the agencies, a formal proposal will be made by the City and District. But, the licensees do not want to make a formal proposal until they are reasonably sure that it will meet with acceptance by the agencies.

Engman said the staff proposal was a step in the right direction and he would take it back to the HDG for review with that understanding.

Ging added that he also will take the proposal back to those who need to review it at USFWS. He said that the agency recognizes that there may be some restrictions on hunting to maintain water quality, but they believe that the mitigation lands should be open as much as possible to hunting. He was concerned that the City would continue to restrict more and more of the watershed in the future and he saw this as a potential flaw in the Lake Chaplain tract.

Graves said that he had talked with his supervisors at the City and they do not want to open any more of the watershed than they identified in the map at the last meeting. He offered a new map which had the earlier cross-hatched area as well as areas specifically to be open to hunting. The City's proposal was:

- 1) No public access at all within 1,000 feet of the lake shore (cross-hatched area) (Vaughn later calculated the area from Graves' map and estimated it to be approximately 762 acres).
- 2) General day-use public access on the remainder of the tract (approximately 1,265 acres) but hunting only on approximately 547 acres identified in yellow on the map. The city ordinance prohibiting hunting could be amended to allow hunting on the 547 acres.
- 3) Boundaries should follow 1/16 section lines for legal identification purposes in the city ordinance.

Ging asked why the City needed to restrict hunting to so few acres when the Water Quality Constraint Document did not specify that hunting would degrade water quality.

Graves responded that the current trend in municipal watershed management is to restrict public use as much as possible. He said that state and federal drinking water standards continue to get stricter and the City is looking ahead to ensure that they can meet future standards. They don't want to find themselves in a situation where an established policy of public access is preventing them from meeting any standard.

Metzgar added that "uncertainty" is the key issue. The City doesn't want to commit to public access when they are uncertain about the impact it will have on water quality, and the agencies don't want to approve a mitigation plan if they are uncertain about how much of the land will be open to hunting.

Engman stated that the WDG is prepared to make a long-term agreement with this plan. If they agree to a specific plan with certain acreage for hunting, they won't come back later and ask for more land or more access.

Graves added to his earlier comment by saying that the City is prepared to allow logging, but general public access is a concern because of potential biological contamination.

Metzgar said that logging roads are the single largest cause of excess turbidity in forested watersheds and public access would have lesser impact relative to that.

Graves said that logging will be carefully monitored in the watershed, where as general public access is very difficult to administer. The City is going to be conservative if necessary in the face of uncertainty.

Bedrossian asked if the agencies would accept the entire Lake Chaplain tract if adequate justification is provided for the access/hunting boundaries.

Engman said that WDG will accept some restrictions, but not the boundaries just identified by the City. He reminded the group that the WDG did not ask specifically for the Lake Chaplain tract to be in the Plan. The tract is in because it is convenient for the licensees. The WDG does not want the resource (i.e., hunting) to suffer for the convenience of the City and District. If hunting is too limited in the tract, the WDG may ask to remove the tract from the Plan.

Bedrossian requested one map from the City that had their entire proposal on it. She also requested the agencies to define what they would consider acceptable boundaries on the same base map (which the District would provide).

Engman and Ging said they would indicate acceptable boundaries on the maps and asked if they could get base maps showing topography, timber stand boundaries and vegetation cover-types.

Vaughn explained that those features are shown on separate maps, but the District could supply the agencies with large-scale copies.

Engman and Ging noted that any maps they prepared would have little value if this issue remains unresolved. They also added that they didn't want to be bound by anything because this is all part of a package.

Metzgar assured them that this is just staff-level exchange of information and no one will be bound by it. He just wants to know what will be acceptable if the licensees make a new proposal to the agencies.

IV. Plan 2 - Mitigation Package:

Bedrossian distributed the revised mitigation package (Attachment 4), referred to as Plan 2 (Plan 1 was the February, 1987 document submitted earlier). She handed out a table summarizing estimated changes in Habitat Units as a result of the new plan (Attachment 5) and noted that additions to the Plan will cost an estimated \$1 million more than Plan 1 while deletions will save approximately \$1/2 million for a net increase in cost estimated to be \$1/2 million. Key changes in the new plan are:

- 1) Larger buffers around wetlands (200 ft.).
- 2) Management shift of 138 acres added to permanent mixed forest at Lake Chaplain.
- 3) An additional 182 acres in the Lake Chaplain Tract (Attachment 6).
- 4) Deletion of the proposed wetland enlargement at Chaplain Creek.
- 5) Deletion of waterfowl nest boxes, raptor perch sites and other measures specifically for reservoir-benefited species (mallard, osprey, merganser and beaver) in all tracts.
- 6) A change in management of the Lost Lake Tract to include a wider buffer around the lake and mixed forest on a 60-year rotation outside the buffer rather than coniferous forest as proposed earlier (Attachment 7).
- 7) Deletion of reservoir shoreline clearing program and planting program.

(Details on all changes were provided. See Attachments 4-7.)

Bedrossian explained the history of the reservoir shoreline clearing program which was requested by th USFS and asked specifically if the USFS had a problem with leaving the snags along the shoreline of Spada Lake.

Weldon said there was no problem and agreed that the snags should be left.

Ging said the new plan looked good overall, but he would like to see the details of how the new lands at Lake Chaplain would be managed. He also asked that the mixed forest at Lake Chaplain be managed without clearcutting.

Bedrossian and Vaughn agreed that it was possible to do that and the Plan would be written accordingly. Everyone also agreed that there needed to be some flexibility in the management of mixed forest because this is a relatively uncommon type of forest management and future habitat conditions are not easy to predict.

E-113

Engman said he may want to see some of the deleted items put back in the Plan. He thought that progress had been made on more mitigation for deer, grouse and chickadee.

Bedrossian asked that Engman indicate which items the WDG would like back in, and how much credit (in terms of HEP or trade-off mitigation) they would be willing to attribute to them. She explained that justification is needed for all measures in the plan in order to defend them and ensure that they are approved.

V. Summary:

Bedrossian then summarized the meeting and reviewed what needs to be done next.

- 1) Concerning public access on the Lake Chaplain tract, WDG, USFWS and the City will draw what they consider to be acceptable boundaries on the topographic map provided by the District and present these boundaries and approximate acreages at the August 6, 1987 meeting.
- 2) The resource agencies will review Plan 2 and provide comments at the August 6, 1987 meeting with the goal of resolving the sufficiency issue and moving on toward finalization of the Plan.
- 3) The District will prepare a draft monitoring plan for review by the resource agencies.

Bedrossian stressed the need to have the contents of the mitigation plan agreed upon soon because the Lost Lake and Williamson Creek acquisition options will be up at the end of 1987 and Metzgar and Bedrossian are reluctant to recommend acquisition of the tracts without assurance of an acceptable mitigation package.

Engman and Ging both replied that the two tracts should be part of the package and they encouraged the District to proceed with acquisition. Bedrossian asked Engman and Ging how they would react to leaving Lost Lake as a preserved area rather than actively managing it for wildlife if the Commission preferred that alternative in response to environmental groups. Ging responded that he doesn't have a problem with Lost Lake as a preserved area rather than mixed forest. Engman said he would like to see how it affects wildlife value before he decides.

Bedrossian suggested that the HEP process has served its purpose already and that it does not need to be re-run after the plan is finalized.

Ging said it may be acceptable not to finalize the HEP analysis, but a final HEP may be needed if agreement can't be reached and the issue goes to the FERC.

Engman added that personally he thought it would be acceptable to use the draft HEP, but some within WDG may want to see a final HEP analysis to ensure state-wide consistency.

Bedrossian asked if the plan is close enough in content from the agencies' perspective for the District to proceed with preparation of the monitoring program.

Both Engman and Ging said yes, the monitoring program could be prepared.

VI. Next Meetings:

The next meeting is scheduled for August 6, 1987 (9:30 a.m., WDG - Mill Creek office). Another meeting was scheduled for September 3, 1987 (9:30 a.m., WDG - Mill Creek office).

VII. FERC Extension:

Bedrossian told the agencies that the District is planning to request a six-month extension from FERC. The agency representatives agreed that a six-month extension is acceptable. (After the meeting, the District prepared a schedule for plan development which indicates that optimistically (best case) it will take at least nine months to complete the plan and submit it to FERC. The District has therefore requested a nine-month extension from FERC.)

Attachments

E-114

JACKSON PROJECT - FERC #2157
WILDLIFE MITIGATION PLAN - AGENCY MEETING

August 6, 1987

A G E N D A

- I. Purpose of Meeting
- II. Wildlife Mitigation Planning Update
FERC Extension/Schedule
Presentation to Commission (August 25, 1987)
- III. Public Use at Lake Chaplain Tract
- IV. Plan 2 - Mitigation Package
- V. Monitoring Plan
- VI. Summary
- VII. Next Meetings
September 3, 1987 (9:30 a.m., WDW - Mill Creek Office)
Schedule October Meeting

E-115

725U

Categorization of Agency Comments on
Draft Wildlife Habitat Management Plan

	Communication	Technical	New Issue	Policy
1. Public Use	W10 ₂ W12 F9c W20b		W10 ₂ W12 F9c	W10 ₂ W12 F9c
2. Amount of Mitigation for Priority Habitat	W7 W16 F7 ₁ F7 ₃	W7 W16 F7 ₁ F7 ₃		
3. Adequacy of Mitigation for black-tailed deer, ruffed grouse & black-capped chickadee	W2 W8 F6 F7 ₅ F8	W2 W8 F6 F7 ₅ F8		W2 W8 F6
4. Mitigation Trade-offs	W2 W8 W14 W18 F3 F7 ₁ F7 ₃ F8 F11	W2 W8 W14 W18 F3 F7 ₁ F7 ₃ F8 F11		W2 W8 W14 W18 F3 F7 ₁ F7 ₃ F8 F11
5. Duration of Plan	W3 W4 F2	W4 F2	W4 F2	W4 F2
6. Overall Sufficiency	W1 W2 W6 W20c F10	W1 W2 W6 W9 W10 ₁ W11 W13		W1 W2 W10 ₁ W11
7. Monitoring	W5 Fo3 Fo4	W5 Fo3 Fo4		
8. Miscellaneous	W15 W16 W17 W19 W20a F1 F4 F5 F7 ₂ F7 ₄ F9a&b F12 Fo1 Fo2 Fo5	W19 F7 ₂		

W = Washington Department of Game
F = Fish and Wildlife Service
Fo = Forest Service

0505T



BEAK CONSULTANTS INCORPORATED
 11911 N.E. First Street
 Suite 301
 Bellevue, Washington 98005
 Telephone 206/451-3628

July 10, 1987

Ms. Karen Badrossian
 CROKOMISH COUNTY FWD
 2320 California Street
 P.O. Box 1107
 Everett, Washington 98206

Subject: Wildlife habitat benefits resulting from managing forest lands on a sustained-yield 60-year rotation

Dear Karen:

At the request of yourself and Gwill Ging of the U.S. Fish and Wildlife Service, I offer the following explanation of the 60-year rotation we are recommending for the Lake Chaplain mitigation lands.

The primary management objective for the mitigation lands, as we see it, is to improve the overall habitat values for the ten evaluation species. These constitute a diverse collection of species with diverse and somewhat conflicting habitat requirements, and it was necessary to weigh these requirements when developing a management plan. We gave priority throughout the development to late-successional species like the pine marten, Douglas squirrel and pileated woodpecker.

We based the mitigation plan on the belief that the most effective means of managing forest land and altering its habitat value is to manipulate the overstory. We are recommending the use of traditional and non-traditional forest management techniques, such as clear-cutting, thinning and fertilization, to produce a mosaic of forest successional stages on the mitigation lands. Each successional stage will provide a different type of habitat, which in turn will satisfy all or part of the life requirements of a given set of species. By carefully arranging the mosaic in time and space, we allow for a diversity of species that use individual successional stages and an abundance of species that require multiple stages in close proximity (e.g., black-tailed deer).

The two major tasks involved in developing the management plan were: a) identify techniques for creating optimal habitat within each successional stage (i.e., snag creation, browse enhancement, etc.), and b) arrange the stands of various successional stages in time and space to produce the desired balance of habitats. The first task was simply a matter of

consulting the silvicultural and biological literature. The second task required us to prepare a schedule (rotation) of forest clearing, planting, fertilizing and thinning, and a map or scheme for distributing the successional stages within the mitigation tract. We recommended a 60-year rotation, which I will detail below. As for the physical distribution of clearcuts, thins, etc., we followed the following basic guidelines:

- a) No clearcut unit should be larger than 26 acres or wider than 600 feet, which is the optimal size for black-tailed deer. When ruffed-grouse are the species of primary concern, clearcut size should be reduced to 10 acres.
- b) The interspersing of forage (clearcuts) and thermal cover (forest of pole size trees and larger) is important to black-tailed deer and maximum interspersing should be promoted by alternating clearcuts with older forested stands. Once a unit (of 26 acres or less) is clearcut, none of the adjacent forest should be cut for at least 20 years. At 20 years of age the clearcut enters the closed canopy sapling pole stage of succession and begins to provide good cover but poor forage. Adjacent cover areas should then be converted to forage. It requires careful planning to maintain optimal interspersing, but it can be accomplished as shown in Figure 5 of the Draft Management Plan.

As for the distribution of successional stages in time, we recommended the 60-year rotation described on page 67 of the Draft Plan. A rotation of any age will proceed through the same initial stages: early-successional, open canopy sapling pole, closed canopy sapling pole and small sawtimber. The real difference in the length of the rotation is the amount of time spent in later stages, particularly large sawtimber. A standard 50-year rotation will have no large sawtimber. A rotation of 90-years will have 10 to 40 years of large sawtimber, depending on the amount of thinning. Of course, all of these numbers will vary considerably with site conditions, elevation and species composition. The 60-year rotation recommended in the Draft Plan is specific to Lake Chaplain and is based upon the cruise data and other site information we have collected.

Gwill asked about lengthening the rotation and the impact that would have on wildlife habitat. In a nutshell, lengthening the rotation would produce more habitat for late-successional species (pine marten, Douglas squirrel, pileated woodpecker) and less for deer. Shortening the rotation would produce the opposite

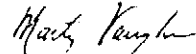
Ms. Karen Redman
July 10, 1987
Page 3

effect, but we were directed to maximize habitat for late-successional species.

I have summarized in Tables 1 and 2 the habitat that will be provided for deer with a 60-year rotation. The basic premise of a sustained-yield rotation is that once all of the managed lands are in the rotation, you will have equal acreages in all age classes. If cutting is done every year, the forest will have 60 different age classes. We are proposing to lump cuts into 5-year groups for efficiency, so we will end up with 12 different age classes. All age classes will have an equal number of acres, and that distribution of acreages will remain constant over time. As each individual unit matures it will enter successively older age classes, but the availability of all age classes within a given area will remain constant because of the small unit size and high interspersed. The end result is diverse, stable habitat that should theoretically support a diverse and stable wildlife community. This in itself is a significant improvement over traditional forest management where extensive areas are clearcut within a short period of time and habitat diversity and stability are both low.

I hope that this clarifies our approach on forest land management. Please let me know if you have any questions.

Sincerely,



Martin E. Vaughn
Project Manager D3105
BEAK CONSULTANTS INCORPORATED

MEV/san

Table 1. Life requirements for black-tailed deer provided by successional stand conditions of the sustained-yield 60-year forest land rotation proposed for the Jackson Project mitigation lands.

Stand Age (years)	Stand Condition	Life Requirement	
		Cover	Forage
0-10	Early-Successional	none	optimal
10-15	Open Sapling Pole	none	optimal
15-20	Open Sapling Pole	hiding	maintenance
20-30	Closed Sapling Pole	thermal ^{1/}	none
30-45	Small Sawtimber	thermal	none
45-50	Small Sawtimber ^{2/}	hiding	maintenance
50-60	Large Sawtimber	thermal	maintenance

^{1/} thermal cover includes hiding cover as well

^{2/} following commercial thin at stand age 45 years

E-117

Table 2 Distribution of black-tailed deer life requirements in time and space under the 60-year forest land rotation proposed for the Jackson Project mitigation lands

Life Requirement	Years Present	Acres Present*
Hiding Cover	10	10
Thermal Cover (includes hiding cover)	35	35
Maintenance Forage	20	20
Optimal Forage	15	15

*Number of acres that would support each life requirement on a 60-acre parcel managed on a sustained-yield 60-year rotation

E-118

Jackson Project - FERC #2157

WILDLIFE MITIGATION PLAN PACKAGE (Plan 2)
for Staff Level Discussion

This plan "package" (Plan 2) reflects June 26 and 29, 1987 consultations with agencies.

Lake Chaplain Tract (For plan elements referenced, please see the Draft Wildlife Habitat Management Plan, February, 1987 (Plan 1).)

- Retain 55 acres of existing old-growth and manage 217 acres of forested land directly adjacent for late-successional wildlife species (same as Plan 1). Justification: Agencies identified old-growth as high priority.
- Protect and enhance existing wetlands and establish 200-ft buffers around them (double size of buffer in Plan 1). Justification: Agencies requested 200-ft buffers around wetlands.
- Establish 100-ft buffers along major streams and 50-ft buffers along intermittent or non fish-bearing streams (similar to Plan 1). Justification: Agencies requested buffers this size.
- Preserve riparian lands along Sultan River to enhance old-growth characteristics for benefit of late-successional species (same as Plan 1). Justification: Agencies identified old-growth and riparian habitat high priority.
- Manage approximately 1,300 acres of second-growth forest on a modified 60-year rotation (same as Plan 1). Include snag management, green-tree leave unit, and dead and down woody material management programs to promote old-growth characteristics (described in Plan 1). Justification: Sixty-year rotation provides balance of mitigation for evaluation species. Agencies identified old-growth (characteristics) high priority.
- Retain approximately 303 acres of mature deciduous and mixed forest (do not actively convert to coniferous forest). Justification: This measure specifically requested by agencies.
- Add approximately 182 acres to the Lake Chaplain Tract (acreage will be obtained by City of Everett from DNR). An exchange of 184 acres included in Plan 1 but proposed for trade to DNR for 184 acres of newly acquired lands will also be included. (Land exchange will be finalized in September, 1987). Manage newly acquired lands to optimize value for deer, grouse and chickadee. Justification: Agencies requested more mitigation for these three species.

Lost Lake Tract

- District purchase Tract (205 acres) to prevent residential development (same as Plan 1). Justification: Agencies and public interested in preserving wildlife value on this tract.

- Protect existing lake and wetland and establish 200-ft permanent buffer (doubles size of wetland buffer in Plan 1). Justification: Agencies requested 200-ft buffers around wetlands.
- Manage forested area to optimize value to deer, grouse and chickadee. Maintain in mixed forest cover type. Justification: Agencies requested more mitigation for these three species and more mixed forest.

Project Facility Lands

- Pipeline right-of-way managed for early-successional species as per Plan 1.
- Powerhouse site managed for early-successional grass/shrub characteristics as per Plan 1.
- Transmission line right-of-way and wedge-shaped parcel managed for early-successional and mixed forest species as per Plan 1. Justification: Best use to balance out mitigation.

Spada Lake Tract

- Manage reservoir shoreline (elevation 1450 ft. to 1460 ft.) as permanent forested buffer. Justification: Best use overall for evaluation species.
- Manage deciduous riparian zone (elevation 1445 ft. to 1450 ft.) as permanent riparian buffer. Existing live trees and snags will be retained (except for snags causing water quality or safety hazard). Justification: Riparian habitat considered high priority by agencies.

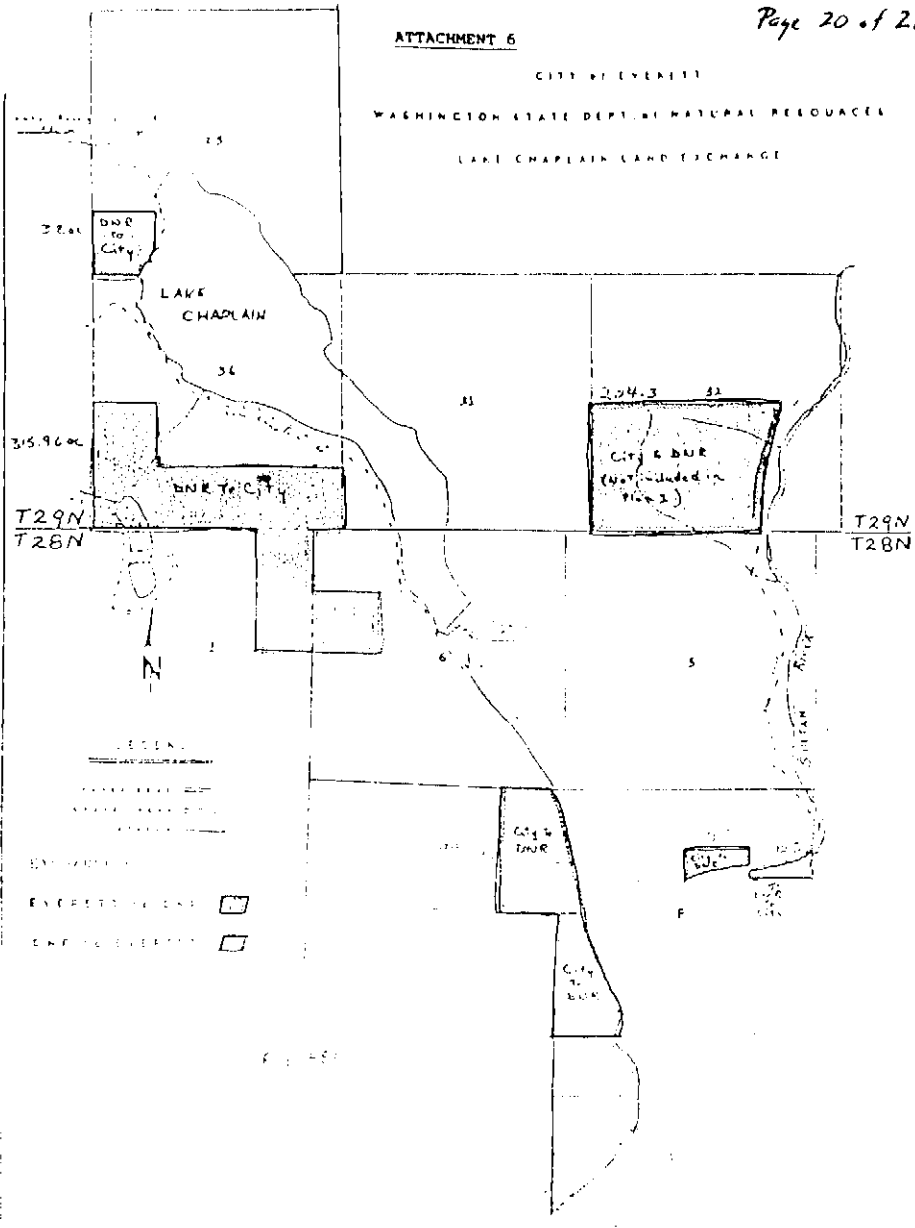
Williamson Creek Tract

- Retain all existing old-growth stands. Justification: Old-growth considered high priority by agencies.
- Retain riparian lands along Williamson Creek. Justification: Riparian habitat considered high priority by agencies.
- Retain existing wetlands. Justification: Wetlands considered high priority by agencies.
- Retain all other forested areas. Justification: Management emphasizing old-growth (characteristics) considered high priority by agencies.

Plan 1 vs Plan 2 Revisions - Summary

TRACT	ADDITIONS	DELETIONS
Lake Chaplain	100' enlargement of wetland buffer zone (requested by agencies) Management shift of 138 acres added to permanent mixed forest management from 60-year rotation (requested by agencies) New land (182 acres) added to wildlife mitigation plan and managed for deer, grouse and chickadee (additional mitigation for these three species requested by agencies)	Wetland development (9 acres) (Wetland mitigation will be 100% without development). Waterfowl nest boxes (11) (Measures for reservoir benefited species and mitigation measures not included in HEP were not considered high priority by agencies). Enhancement measures specific to reservoir benefited species (osprey, mallard, common merganser and beaver) except for direct wetland enhancement (same reasons as above). Perch sites along pipeline right-of-way (mistake in Plan 1).
Lost Lake	Increase lake and wetland buffer (requested by agencies) Change management to optimize value to deer, grouse and chickadee and maintain mixed forest cover type (agencies requested increased management for these species and mixed forest)	Waterfowl nest boxes (2) (Measures for reservoir benefited species and mitigation measures not included in HEP were not considered high priority by agencies). Enhancement measures specific to reservoir benefited species, e.g.: floating nesting islands (3) and osprey nesting platform (1) except for direct wetland enhancement (same as above).

CITY OF EVERETT
 WASHINGTON STATE DEPT. OF NATURAL RESOURCES
 LAKE CHAPLAIN LAND EXCHANGE



DRAFT

D3105
 July 21, 1987

Recommended changes in Lost Lake management to maximize habitat value for black-tailed deer, ruffed grouse, and black-capped chickadee

- 1) Establish 500-ft. buffer around Lost Lake and adjacent wetland (54 acres)

Within this buffer:

- no cutting within 200 ft. of the lake or wetland
- no cuttings greater than 1 acre
- no more cutting than 5 acres every 10 years
- maintain existing mixed forest and make improvements for wildlife (snags, trails, dead and down).

- 2) Management of Stands 7-1, 7-2 and 7-3 (55 acres)

- initiate snag and dead and down woody material programs by 1990
- promote mixed forest in next rotation by leaving mature cottonwood and maple as seed sources (prune if necessary to prevent windthrow)
- no manipulation will occur until clearcut
- clearcut in 6 units; 2 units in 2000 (19 acres); 2 units in 2020 (18 acres); 2 units in 2040 (18 acres)
- green tree leave units will be left in stand 7-2 only

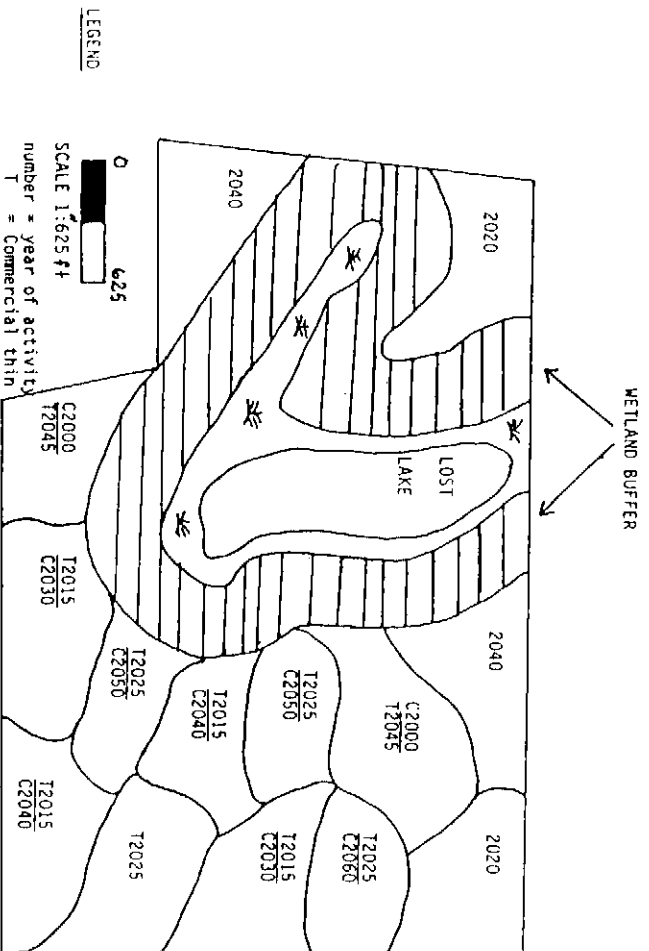
- 3) Management of Stand 7-4 (68 acres)

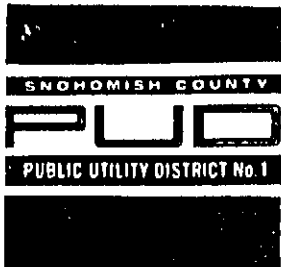
- thin pre-commercially to produce mixed forest in 1990
- use herbicide injection method for pre-commercial thin to prevent slash accumulations
- divide stand into 8 units; commercially thin half of the units in 2015 and half in 2025
- leave 1/4 acre green tree leave units for every 5 acres (designate green tree leave units prior to commercial thinning)
- initiate snag and dead and down woody material programs between 2015-2020
- clearcut 2 units in 2030 (20 acres); 2 units in 2040 (16 acres); 2 units in 2050 (13 acres); and one unit in 2060 (8 acres)
- leave one unit (11 acres) unharvested

- 4) Guidelines for management of lands adjacent to stand 7-4, outside of the Lost Lake Tract

- maintain unharvested until 2010

DRAFT





2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206
August 18, 1987
PUD-17475

Mr. Gary Engman
Washington Dept. of Game
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Roger Williams
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Mr. Joe Potter
Department of Natural Resources
919 North Township
Sedro Woolley, WA 98284

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Charles A. Dunn
Field Supervisor
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Monitoring Program

Enclosed is a copy of the draft monitoring program for your review. The monitoring program will become part of the Wildlife Habitat Management Plan. Please be prepared to provide comments and discuss the monitoring program at the September 3, 1987 consultation meeting. If you have comments or questions prior to September 3, please call Karen Bedrossian at (206) 347-4374.

The September 3, 1987 meeting will be held at Washington Department of Wildlife, Mill Creek office, at 9:30 a.m. We look forward to seeing you there.

Very truly yours,
Original Signed By *for LCG*
M. Metzger
L. Chet Grimes
Manager, Generating Resources

Enclosure
KLB:jk

cc: C. Olivers, City of Everett
G. Graves, City of Everett
M. Vaughn, Beak Consultants

G. Ging, USFWS
L. Weldon, USFS
D. Hays, Beak Consultants

DRAFT

9.0 MONITORING PROGRAM

Habitat enhancement activities will be monitored to ensure that they are carried out as prescribed in the Plan. Monitoring will occur in two phases: 1) direct supervision of all activities by a District biologist and 2) follow-up monitoring of habitat features to verify that the desired results have been achieved. The first phase is relatively straight-forward. It will require the biologist to be actively involved in the selection, lay-out, marking, sale and harvest of all clearcuts and thins as well as the development of performance specifications and supervision of all contractors. The second phase will require the qualitative or quantitative measurement of specific habitat features and the comparison of observed values to target values or assumptions made in the Plan. Monitoring will be done as described in the following sections.

*Note: remainder of Draft Monitoring
Program omitted from
Appendix E.*

E-123

RECEIVED

AUG 27 1987

OFFICE OF THE
COMMISSION

Snohomish P.U.D. Commission
P.O. Box 1107
Everett Wa 98206

Dear Commissioners,

I would like to offer the following comments on the Sultan Basin Wildlife Mitigation Plan on behalf of the Pilchuck Audubon Society.

We have been following the Plan for some time, and feel that it represents an excellent opportunity to set aside some areas of the county which would otherwise be lost.

We especially urge the Commission to pursue acquisition of the Lost Lake tract. We feel that it is a real one of a kind area in the county. One concern which we have is the level of management being proposed by District staff should the lake be acquired.

Specifically, we object to the plans which we have seen which call for extensive logging within the tract. While we feel that the recent change in the extent of the no-cut buffer zone around the lake from 100 to 200 feet with an additional 300 feet of removal of conifers only is a substantial improvement from what was first proposed, we still feel that the best approach which could be taken to manage this area is to be as light handed as possible, which means to pretty much leave it alone.

It appears that the District staff is recommending that the Lost Lake tract be logged in order to satisfy the "in kind" mitigation requirements of the "HEP" process which is being used to assess the suitability of various wildlife habitats. Ostensibly, the reason for logging the tract is to provide post clearcut habitat for deer and black capped Chickadees similar to that of the clearcut areas which were flooded by the dam.

It would be unfortunate if this narrow, literal view of how to interpret the law on this were to distort the spirit of the program, and cause us to lose the opportunity of saving this lake in a fairly natural state. We feel, and I know that we are not alone in this, that the mandate behind the HEP system is to provide mitigation of an "equal or better" sort than what was lost. With the Lost Lake tract we clearly have something which is much better than the clearcut areas which were lost when the dam was raised. Yet the District staff are proposing, in effect, to degrade this area by logging in it so as to approximate the conditions which were found in those clearcut areas behind the dam in order to gain "points" for those species which live in cutover areas.

This bureaucratic rationale for damaging this lovely lake has, to put it simply, no basis in common sense. If there is one thing

Aug 26 1987
Rick McGuire
Pilchuck Audubon Soc.
1219 121st Pl. S.E.
Everett Wa 98206

which we absolutely do not lack here in Snohomish county, it is post clearcut wildlife habitat of precisely the type which the District staff is proposing to create up at Lost Lake. Much if not most of the plateau west of Lake Chaplain upon which Lost Lake sits is controlled by the Department of Natural Resources, which has plans to log it in the coming years. This will create literally hundreds of times as much of this post clearcut habitat as the District would create at Lost Lake by implementing its plan as it now stands. Why then, when so much area adjacent to the Lost Lake tract will be logged in years to come, must we also log this area?

We understand that the District staff has felt pressured by FERC and other agencies to do things which may not at times seem best. But this is too great of an opportunity, that of preserving a relatively natural, undisturbed lowland lake, to let it go by because that happens to be the way the rules are being applied in this case. The spirit behind the HEP program is to provide equal or better habitats than what was lost. If there was a five acre parking lot which was flooded by the dam would we go in and pave over five acres somewhere to make up for it? Of course not. But that is, in effect, what the District staff is proposing to do by logging in the Lost Lake tract to replace the cutover areas flooded in the Sultan Basin.

We clearly have an opportunity at Lost Lake to replace those cutover areas with something better. Let's not let a narrow interpretation of the rules make us lose this opportunity. The District will be spending quite a large sum of money to acquire this area if it is purchased. Let's make sure we get the most for it, and not let the bureaucrats in faraway agencies dictate that we do something which makes no sense at all. We are not saying that the area should never have anything done to it. There are some small bulldozed and devegetated areas which need attention. But let's keep the second growth forests there the way they are. We've got plenty of clearcuts already. We urge the Commission to acquire the area and essentially leave it alone (without recreational developments either- those are much better provided elsewhere.)

If these other agencies or FERC prove to be difficult in accepting this, let's stick to our guns and not let them thwart this chance. We would be more than willing to communicate our concerns directly to them, and bring to bear whatever leverage we have to keep them from insisting on this wrongful literalist interpretation of the Concept of "in-kind" mitigation.

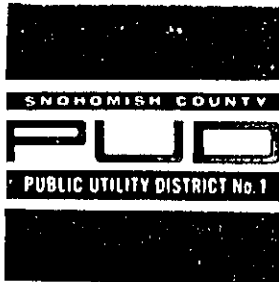
Let's keep Lost Lake the way it is!

Sincerely,

Rick McGuire

Rick McGuire

E-124



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address P O Box 1107, Everett, Washington 98206
 August 28, 1987
 PUD-17481

Mr. Gary Engman
 Washington Dept. of Game
 Region 4
 16018 Mill Creek Blvd.
 Mill Creek, WA 98012

Mr. Roger Williams
 District Ranger
 U.S. Forest Service
 Mt. Baker-Snoqualmie Nat'l Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Mr. Joe Potter
 Department of Natural Resources
 919 North Township
 Sedro Woolley, WA 98284

Mr. David Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. Charles A. Dunn
 Field Supervisor
 U.S. Fish & Wildlife Service
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
 Draft Wildlife Habitat Management Plan
Agency Meeting Summary

A summary is enclosed of the August 6, 1987 meeting held to discuss the hunting/public access issue at Lake Chaplain and other issues related to the wildlife mitigation plan in an effort to reach consensus on the content of a final plan. If you have comments about the meeting or the meeting summary, please advise Karen Bedrossian at the September 3, 1987 meeting.

Our next meeting will be on September 3, 1987, at the Washington Department of Wildlife offices in Mill Creek at 9:30 a.m.

Very truly yours,

Original Signature
 L. C. GRIMES

L. Chet Grimes
 Manager, Generating Resources

Enclosure
 KLB:jk

cc: C. Olivers, City of Everett
 G. Graves, City of Everett
 M. Vaughn, Beak Consultants

C. Ging, USFWS
 D. Hays, Beak Consultants

756U

Attachment to
 District letter of 8/28/87
 Page 1 of 10

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
 AND
 CITY OF EVERETT, WASHINGTON

JACKSON PROJECT - FERC NO. 2157
 LICENSE ARTICLE 53
 TERRESTRIAL RESOURCE MITIGATION PLAN

Agency Meeting Summary

Date: August 6, 1987

Place: Washington Department of Wildlife (WDW), Region 4 Mill Creek Office

Attendees: Gary Engman - Washington Department of Wildlife (WDW)
 Gwill Ging - U.S. Fish and Wildlife Service (USFWS)
 Clair Olivers - City of Everett (City)
 Gary Graves - City of Everett (City)
 Dan Lowell - City of Everett (City)
 Chet Grimes - District
 Karen Bedrossian - District
 Dave Hays - Beak Consultants, Inc. (Beak)
 Marty Vaughn - Beak Consultants, Inc. (Beak)

I. Purpose:

Resolve hunting/public access issue at Lake Chaplain, and reach agreement on the contents of the Plan (see agenda, Attachment 1).

II. Wildlife Mitigation Planning - Update:

Bedrossian started the meeting by stating the purpose and handing out minutes of the last meeting (July 22). She said that the District requested a 9-month extension from FERC (through May, 1988). She also mentioned that the presentation to the District's Commission on the wildlife plan was changed to August 25, 1987, from August 11. The meeting will start at 1:30 p.m., but the mitigation plan may not come up until late in the agenda.

III. Public Use at Lake Chaplain:

Olivers presented the City's position (see Attachment 2). The cross-hatched area represents the hydrographic boundary surrounding Lake Chaplain to the nearest 1/16 section lines and will remain closed to public access. The total acreage of the Lake Chaplain Tract will be 2,208 acres, while the area closed to public access will be approximately 1,108 acres. This number includes acreage obtained in the land exchange with the Department of Natural Resources (DNR). (Subsequent planimetry of the cross-hatched area by Beak estimated

756U

-1-

approximately 1,100 acres closed to public access, similar to the City's estimate.)

Lowell presented the rationale for Lake Chaplain restrictions (Attachment 3).

Engman asked why these concerns were not voiced a year ago when the planning process began?

Lowell responded that the public access restriction is not a new issue with the City.

Engman said he has serious concerns about accepting a mitigation plan that restricted access on 40 percent of the land area. The amount of land offered with hunting access does not even equal the amount of land that was lost.

Bedrossian commented that if lands used for mitigation previously were open to hunting, then the number of acres open to hunting in the Basin would be the same with or without mitigation. Since the Licensees would be opening 205 acres at Lost Lake that are presently closed to hunting and 1,100 acres at Lake Chaplain, there will be over 1,300 additional acres open to hunting in the Basin. This is an added benefit to the mitigation plan which should help to offset concern over the restricted area.

Engman stated that MDM was willing to compromise with a restricted buffer around Lake Chaplain (boundary map date July 10, 1987, and included in June 26, 1987 meeting notes), but the City's proposal goes well beyond the point of compromise and is too restrictive.

Ollivers stated that the hydrographic boundary is the only technically feasible and defensible boundary. The City must stick to the hydrographic boundary.

Lowell asked why hunting and fishing are included as concerns in the wildlife mitigation plan and suggested they be addressed as recreation issues.

Engman stated that the Recreation Plan does not cover fish and wildlife.

Bedrossian stated that Roy Metzgar has informally addressed the hunting issue with FERC and they will review similar cases to provide direction. The two proposals are about 600 acres apart. She asked for suggestions on how to resolve the situation as it now stands. The options discussed include:

- 1) go to FERC and let them make a decision;
- 2) reduce restrictions at Lake Chaplain; and
- 3) use other lands for mitigation which are open to hunting/access.

Grimes asked if we could improve recreation possibilities somewhere else to solve this issue.

Ging said he was amenable to the idea.

Engman said he was not amenable to the idea.

Grimes asked for clarification as to whether MDM would give any credit at all for lands with restricted access.

Engman said he would not have accepted restricted lands a year ago. He is willing to make some compromises now, but the City's proposal is too restrictive.

Ging said that he would like to see the licensees come up with a proposal to solve the access issue.

Engman said that MDM would have accepted 20 percent of the mitigation lands restricted to public access in the compromise they considered acceptable, but not 40 percent as proposed. He warned that MDM was prepared to go to FERC.

Bedrossian asked what species priorities MDM and USFWS would prefer if additional or other lands were used.

Engman said most likely black-tailed deer and ruffed grouse, since these are the two evaluation species that were not fully mitigated and are hunted.

Bedrossian said that the licensees will look for alternatives to resolve the hunting issue.

IV. Plan 2 - Mitigation Package:

Engman (and Ging) said that the overall Plan would be sufficient with the following additions:

- 1) Satisfactory resolution of the hunting/access issue.
- 2) Inclusion in the Plan of new lands acquired by the District around Spada Lake, if and when they are acquired. Management emphasis must be for black-tailed deer, with due regard for other species.
- 3) Reinstatement of nest boxes, nesting islands and osprey nest platforms at Lost Lake.
- 4) Development of two osprey nest platforms at Spada Lake and reinstatement of shoreline vegetation test program (and future implementation if testing works).

Bedrossian said she would take this proposal back to her superiors.

V. Monitoring Plan:

Bedrossian said that the monitoring plan will be sent to agencies soon. She requested that they review the program before the September 3, 1987 meeting.

E-126

VI. Summary:

Bedrossian summarized the meeting and reviewed what will occur prior to the next meeting:

- 1) The District will review and discuss the acceptability of the proposed additions presented by Engman.
- 2) The District and City will look for solutions to the hunting/public access issue.
- 3) Agencies will review the monitoring program.

VII. Next Meetings:

The next meeting is scheduled for September 3, 1987 (9:30 a.m., MDG - Mill Creek Office). Another meeting was scheduled for October 15, 1987 (9:45 a.m. - Everett Business Center).

E-127

JACKSON PROJECT - FERC #2157
WILDLIFE MITIGATION PLAN - AGENCY MEETING

August 6, 1987

A G E N D A

- I. Purpose of Meeting
- II. Wildlife Mitigation Planning Update
FERC Extension/Schedule
Presentation to Commission (August 25, 1987)
- III. Public Use at Lake Chaplain Tract
- IV. Plan 2 - Mitigation Package
- V. Monitoring Plan
- VI. Summary
- VII. Next Meetings
September 3, 1987 (9:30 a.m., MDG - Mill Creek Office)
Schedule October Meeting

RATIONALE FOR LAKE CHAPLAIN RESTRICTION
August 6, 1987

Over the years, the Utilities staff at the City of Everett have been involved in numerous discussions concerning the reasons for closure of the Lake Chaplain Watershed to the public. Usually, these discussions have been precipitated by persons wishing to use the Lake Chaplain area lands for their own particular purposes. These have run the gamut from jogging and hiking to mushroom picking, hunting, fishing, bird watching, and other outdoor pursuits. Each group seems to feel that they have some inalienable right to pursue their chosen activity in the Lake Chaplain Watershed. Necessarily, these discussions are usually long and involved, and require a fair effort on the part of our staff to educate the individual making the inquiry. In addition, please note that volumes have been written about watershed management and control for water quality, by water quality professionals, over the years, throughout the western world. Hence, it is challenging to summarize in a few pages these arguments which we have presented during hours of discussion and which have been presented in treatises on the subject. At any rate, we have listed each point below, in no particular order of importance. Please note that some points are immediate and very tangible, others are long term and somewhat intangible.

- 1.) This discussion concerns the lands within the Lake Chaplain hydrographic boundary only.
- 2.) The Everett Utilities Division operates as an enterprise of the City, with its own funds, derived from rates and charges. Essentially, we are a private business. We own the lands in question. These lands are not owned by the public or the taxpayer in general. In the broadest sense, however, if any member of the general public has a claim on these lands, it is our ratepayers, who include about 75% of the people in Snohomish County. Any event, or activity which increases our water treatment and production costs, is eventually borne by our ratepayers and no one else. The City of Everett Utilities Division operates on a cost-of-service basis.
- 3.) The protection and control of a municipal watershed for drinking water quality purposes is an accepted and common practice throughout our industry whenever possible. Cities, such as Vancouver, B.C., and Portland, OR, have vast watershed areas virtually locked up in order to minimize human impacts. The Passaic Valley Water Commission, in Northern New Jersey, literally keeps their Wanaque Reservoir and watershed area fenced - thousands of acres. Other cities such as Tacoma and Seattle, have varying degrees of watershed protection and control. Virtually, in every case where public access is allowed to a municipal watershed, it has occurred due to political pressures. No drinking water

quality professional would allow watershed access if they had their preferences.

- 4.) How long do we need our watershed? How pristine should it be? How much money should we expend to keep the watershed as clean and natural as possible? Do we only need our watershed for 100 years? Do we need it for 1,000 years? Which generation do we saddle with a deteriorated water supply as well as the cost for treating that water? The point of these rhetorical questions is that we feel that public use inevitably leads to reduced water quality.
- 5.) Our entire industry is continually under public scrutiny. The public wants the best drinking water possible at the lowest cost possible. If we knowingly allow anything to transpire that might be detrimental to water quality, we will have failed our rate payers and will be in violation of the intent of the Safe Drinking Water Act.
- 6.) Our industry is constantly barraged with new scientific and medical information related to drinking water contaminants. The treatment technology for removal of these contaminants is usually expensive and has associated risks. The obvious best approach for minimizing the contaminants in our drinking water is to protect the source of supply. How do we do that? The least cost, most conservative method presently points to closure of watersheds to public access.
- 7.) Medical professionals, scientists, planners and industry professionals generally agree on the concept of protection and control for municipal watersheds. This is evident in the Safe Drinking Water Act and in most state regulations. WAC 248-54-225 specifically addresses watershed control. The scientific information concerning public health aspects of drinking water is not all in yet. Thus the large number of unknowns in the water quality equation behooves us to take the conservative approach.
- 8.) Overall, the City of Everett wants to protect our watershed for public health reasons. We feel our position is consistent with federal, state, and local health authorities regarding watershed protection. We feel our position is consistent with the expressed concerns of the public to err on the side of too much water quality protection rather than risk too little.
- 9.) The Everett Filtration Plant was essentially forced upon our ratepayers (\$30,000,000 worth) due to a lack of control in the Spada Lake - Sultan Basin Watershed, which ultimately feeds Lake Chaplain. However, due to the overall excellent water quality of the Sultan supply, and because of restrictions currently in force regarding the use of Spada Lake and Lake Chaplain, the City was able to build a direct filtration plant in lieu of a conventional filtration plant.

This saved the rate payers approximately \$7,000,000 in construction expenses. Additionally, the direct filtration system cost approximately \$750,000 a year less to operate than a comparable conventional filtration plant. The health agencies in many states have not allowed the construction of a direct filtration plant due to a lack of watershed control or varying source water quality. Everett would almost certainly have to upgrade to a conventional plant if there were any signs of water quality deterioration or decreased control in the watershed. As a matter of fact, sedimentation basins were allowed for in the original design, should they be required in the future.

- 10.) The Lake Chaplain watershed is particularly susceptible to adverse human impacts for the following reasons:
- a.) The lake is relatively small and possibly not able to handle any more contaminant or nutrient loading than is already present.
 - b.) The watershed is small and therefore easily impacted by a relatively small number of people.
 - c.) The watershed has mostly steep slopes leading directly to the lake.
 - d.) Due to the high annual rainfall (80-90 inches per year), most streams, and there are many, run at least 8 - 9 months of the year. These water courses feed directly to Lake Chaplain and will carry contaminants, erosion products, nutrients, etc. directly to Lake Chaplain. Even a minor amount of a toxicant related to human activities will in all probability, over time, significantly impact Lake Chaplain.
- 11.) Sanitary problems are always increased in a watershed when human activities increase.
- 12.) Hunting in the Chaplain watershed is of particular concern due to the following reasons:
- a.) Utilities workers would be exposed to the obvious risks incurred by any individual present in an area where hunters are active.
 - b.) Wounded animals, particularly deer, often end up dying in Lake Chaplain. The cleaning/gutting of animals by hunters results in gut piles which lie around for months acting as a breeding ground for bacteria. High amounts of rainfall and numerous intermittent streams almost guarantee that this will impact the lake.
 - c.) In many instances, hunters will wash the gutted carcass in the nearest stream. Since the Chaplain watershed

runs downhill to the lake, that is where the entrails and washings will go.

- 13.) Fire hazards. With increased human activity comes the increased risk of a forest fire. The nature of the Chaplain watershed is such that any fire would be extremely difficult to fight. It is the opinion of Utilities management at this time, that a fire would be disastrous for water quality reasons, among others.
- 14.) Our current fears include access to the Chaplain watershed and abutting areas. We feel the same thing may happen in the Chaplain area as happened in the Sultan Basin. Namely, that publicity and easy access will lead to immediate overuse with all its attendant problems.
- 15.) Even if the Chaplain watershed is held inviolate, there will still be encroachments that are difficult and thus expensive to control, patrol, prevent, and mitigate for. Our rate payers are going to be saddled with the bill for these activities, not the benefitted resource/recreation agencies.
- 16.) The history of Lake Chaplain is that of a drinking water reservoir alone. It is primarily a man made lake. It has been treated as a sedimentation basin for 60 years. During that time it has been controlled fairly tightly. These controls were tightened over the years as new health related information gave birth to more stringent drinking water regulations.
- 17.) Lake Chaplain is an integral part of the direct filtration treatment process where it acts as a pre-sedimentation basin. Without Lake Chaplain we would have been required to build a conventional filtration plant. The negative aspects of this option were explained earlier.
- 18.) The City currently has a closed water treatment system at Lake Chaplain. This system begins with pre-sedimentation in the lake, and ends with recirculation of the filter backwash wastewater (as in other direct filtration plants) to the plant for reuse. In addition, filtrate from the backwash solids drying beds also goes to the lake for recycling and reuse. Please note that this very efficient closed system makes our treatment process one of the least costly in the nation to operate. However, due to the nature of the closed process, any degradation of water quality in the lake could easily preclude continuance of this system due to the concentration effect that this operation has on pollutants. Presently, the dissolved contaminants coming into Lake Chaplain are so low in concentration that we have no foreseeable problems related to concentration effects, as long as the water quality remains approximately constant.

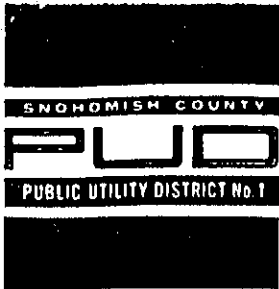
- 19.) Since we operate a closed system, an NPDES permit has not been a requirement. However, if at some point we must discontinue the recirculation of the back-wash water, it will be necessary to discharge this wastewater to Chaplain Creek. Obviously, we would have to begin a treatment and monitoring program consistent with NPDES requirements. As stated earlier, the present closed system of operation is entirely dependent upon the relatively high level of water quality in Lake Chaplain. Please note that state water quality requirements for aquatic organisms are more strict in many instances than they are for human consumption. Thus the requirements we might face in meeting an NPDES permit could be very expensive.

- 20.) Recent evidence has conclusively linked the chlorination of drinking water to cancer. Hence, all utilities will eventually be encouraged to reduce the amounts of chlorine they use in their treatment scheme. Any activity in the watershed which may impact bacteriological or algal growth rates in Lake Chaplain would necessitate increased chlorine dosages and thus increased cancer risks according to EPA. The direct filtration process has a designed-in short detention time (flow through the plant), thus it is very sensitive to chlorination levels. In order to obtain the proper disinfection levels required to prevent microbial growth in the filters and flocculation basins, chlorine, due to its disinfectant strength, is the chemical of choice. If microbial and algal levels in the Lake, which are directly related to the quality of the watershed runoff, increase then it is possible that we would have to upgrade the plant to a more expensive process.

E-130

Summary

To reiterate, who will be required to pay for the degradation of water quality in Lake Chaplain? Obviously, our rate payers. Note that the City of Everett presently provides an absolutely essential service to more than 300,000 citizens. These people have a right to high quality drinking water and it is the responsibility of Utilities management to meet this challenge. Population projections estimate that the Everett system will be serving approximately 1,000,000 people by the year 2020. To risk sacrificing the Lake Chaplain water quality currently afforded us by the watershed in exchange for recreation opportunities in a state with more recreation opportunities than most civilized areas of the free world is absurd. Hence, our position regarding access to the Lake Chaplain watershed is necessarily conservative. The City's position is consistent with federal and state health regulations, and seems very much in tune with the general public's position regarding exposure to health hazards from any source.



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P. O. Box 1107, Everett, Washington 98206

September 18, 1987
 PUD-17523

Mr. Gary Engman
 Washington Dept. of Game
 Region 4
 16018 Mill Creek Blvd.
 Mill Creek, WA 98012

Mr. Roger Williams
 District Ranger
 U.S. Forest Service
 Mt. Baker-Snoqualmie Nat'l Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Mr. Joe Potter
 Department of Natural Resources
 919 North Township
 Sedro Woolley, WA 98284

Mr. David Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Mr. Charles A. Dunn
 Field Supervisor
 U.S. Fish & Wildlife Service
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Gentlemen:

**Jackson Project - FERC #2157
 Draft Wildlife Habitat Management Plan
 Agency Meeting Summary**

A summary is enclosed of the September 3, 1987 meeting held to discuss the wildlife mitigation plan and reach consensus on the content of a final plan. If you have comments about the meeting or the meeting summary, please advise Karen Bedrossian by October 15, 1987.

Our next meeting is scheduled for October 15, 1987, at the District's office in the Everett Business Park (Building "A", Room "A") at 9:45 a.m.

Very truly yours,
 Original Signed
 L. C. GRIMES

L. Chet Grimes
 Manager, Generating Resources

Enclosure
 KLB:jk

cc: C. Olivers, City of Everett
 D. Lowell, City of Everett
 G. Graves, City of Everett
 G. Ging, USFWS

M. Vaughn, Beak Consultants
 D. Hays, Beak Consultants

*Attached to
 District letter of 9/18/87
 Page 1 of 11*

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
 AND
 CITY OF EVERETT, WASHINGTON

JACKSON PROJECT - FERC NO. 2157
 LICENSE ARTICLE 53
 TERRESTRIAL RESOURCE MITIGATION PLAN

Agency Meeting Summary

Date: September 3, 1987
 Place: Public Utility District No. 1 of Snohomish County (District), Everett Business Park
 Attendees: Gary Engman - Washington Department of Wildlife (WDW)
 Gwill Ging - U. S. Fish and Wildlife Service (USFWS)
 Dan Lowell - City of Everett (City)
 Gary Graves - City
 Chet Grimes - District
 Roy Metzgar - District
 Karen Bedrossian - District
 Dave Hays - Beak Consultants, Inc. (Beak)
 Marty Vaughn - Beak

I. Purpose:

To reach agreement on the Draft Wildlife Habitat Management Plan and to discuss the monitoring program (see Agenda - Attachment 1).

II. Wildlife Mitigation Planning - Update:

Bedrossian reported on the responses of the District's Board of Commissioners to the Plan. The Commissioners approved the Plan which includes the purchase of Lost Lake. The only plan change they requested was that the word "clearcut" be changed to something else.

Bedrossian asked Engman the procedure for the District to request that Lost Lake be a barbless hook, fly-fishing only lake, because the subject had come up during informal discussions.

Engman responded by saying that the District could write letters to the WDW requesting this, but he did not know if the WDW would approve of that designation. He said that the State probably would have jurisdiction over the lake because it is a natural body of water.

III. Updated Mitigation Package (Plan 3):

Bedrossian stated that the licensees would include in the Plan, the elements requested by agencies at the August 6, 1987 meeting (see meeting notes). The licensees proposed to use lands acquired around

Spada Lake to compensate for hunting restrictions at the Chaplain Tract. The difference between the compromise position of the agencies on public access at Lake Chaplain and the hydrographic boundary restriction designated by the City of Everett is 625 acres. To compensate, the Licensees proposed to manage for wildlife, a minimum of 700 additional acres around Spada Lake if and when they are obtained in the pending land exchange with the USFS. Management of those acres would be directed towards black-tailed deer, with due regard for other species. Hunting would be allowed following MDW regulations (see Attachment 2).

Metzgar updated everyone on the progress on the land exchange. Due to a problem with FERC regarding the inventory of Section 24 lands, the District, Forest Service and DNR want to proceed with the land exchange immediately. The westernmost boundary in the land exchange will probably extend approximately 1,000 feet downstream from Culmback Dam (to the nearest section line).

Bedrossian read and explained the latest version of the Plan (Plan 3 - Attachment 2).

Ging noted that in the Plan 3 outline, the extra 300-foot buffer at Lost Lake was left out. He would like that put back in.

Bedrossian said that the 300-foot buffer is included in the detailed plans for Lost Lake, and she would make sure that it was also mentioned in the revised Plan 3 outline.

Ging questioned the potential conflicts or benefits between the wildlife habitat management plan on the Spada Lake Tract and the recreation plan.

Metzgar responded that there was only one planned recreational development on the north shore of Spada Lake. There may be some further recreational developments in 10-20 years, but that is not too likely. The District and City want to keep the north shore primitive in order to protect water quality due to poor soil conditions along the shoreline. Also, the DNR has expressed concern about public safety on the north shore road and interference with logging trucks. The DNR doesn't want promotion of recreational activities on the north shore.

Grimes said that the District would like to take a wait and see position concerning future developments, depending upon future demand for recreational development.

Bedrossian asked the agency representatives for their reaction to the latest District proposals.

Engman asked the District to specify the areas near Spada Lake that would have restricted access.

Metzgar replied that the only areas that will be restricted to public access around Spada Lake are those areas presently fenced, signed and bordered by razor ribbon. These include the bridge/intake tower, the access shaft, the microwave tower and the control building.

Engman requested that restrictions be stated clearly in the final document.

Bedrossian asked for general concurrence on the mitigation lands (approximately 3,600 terrestrial acres) and the approach of the Plan.

Ging responded that in his view, the Plan is acceptable.

Engman responded that in his view, the Plan is conceptually all right.

Ging commented that since the District Commission approved the Plan, he is not concerned about losing parcels of land.

Bedrossian said that the Licensees will send a formal letter and summary of the current plan to the agencies. Meanwhile, since the plan summary is acceptable to the agency representatives, Beak will prepare the final draft of the detailed Plan. Bedrossian stressed that there would only be one more agency review of the detailed management plan prior to its submittal to FERC. She made sure everyone understood that detailed plans will not be included for the additional Spada Lake exchange lands. Detailed plans for those lands will be prepared after they are actually obtained by the Licensees.

Bedrossian asked whether the agencies would need a final HEP report. She pointed out that the HEP had already served its purpose of guiding the agencies and licensees towards plan sufficiency. There would be a considerable cost savings if the HEP report did not have to be re-done.

Ging did not think it will be necessary to prepare a final HEP report, but requested that a summary of the HEP be included in the Plan. The summary should include a description of how the HEP was used, its intended use and that it wasn't a typical HEP - it was used as a yardstick instead of a surgical tool and the agencies were looking at a total package.

Engman concurred that he would like this also. He did not see a need for a new separate HEP document.

IV. Monitoring Plan:

Bedrossian asked for comments on the draft monitoring plan sent to the agencies on August 18, 1987.

Engman said that he has not had the opportunity to review the Plan as yet.

Bedrossian suggested that it would be beneficial to go through the monitoring program element by element.

Vaughn explained the monitoring program in detail by element.

Grimes stated that it is the intent of the Licensees that a biologist will monitor the Plan. The biologist will be in charge. The forester will be under the biologist's direction and the biologist would have the final say.

E-132

Lowell agreed that the requirements of the Plan as interpreted by the biologist would be the controlling factor.

Ging asked whether the District would add monitoring plans for the nest boxes, nesting islands and osprey platforms. He also asked if the natural conversion of mixed forest to coniferous forest can be monitored.

Bedrossian responded that these would be added to the monitoring program.

Metzgar added that planned periodic aerial photography surveys may be the best way to monitor natural succession and harvest activities. This will be looked into.

JACKSON PROJECT - FERC #2157
WILDLIFE MITIGATION PLAN - AGENCY MEETING

September 3, 1987

A G E N D A

V. Summary:

Bedrossian summarized the meeting by stating that all parties have conditionally reached agreement concerning the Management Plan. A letter summarizing the most recent plan will be sent to the agencies. The final plan draft will be prepared.

VI. Next Meeting:

The next scheduled meeting will be October 15 at the Everett Business Park, Bldg. A, at 0945. A meeting was scheduled for November 17, 1987, at the same location. The meetings will be confirmed approximately two weeks prior to the scheduled date.

- I. Purpose of Meeting
- II. Wildlife Mitigation Planning Update
 - Presentation to Commission and Commission Response (August 25 and September 1, 1987)
- III. Plan 2 - Mitigation Package/Public Use at Lake Chaplain Tract
- IV. Monitoring Plan
- V. Summary
- VI. Next Meetings
 - October 15, 1987 (9:45 a.m., PUD - Everett Business Park, Building A, Conference Room A)
 - Schedule November Meeting

E-133

Jackson Project - FERC #2157

Attachment 2

WILDLIFE MITIGATION PLAN PACKAGE (Plan 3)
for Staff Level Discussion

This plan "package" (Plan 3) reflects consultations with the resource agencies from April through August, 1987.

Lake Chaplain Tract (For plan elements referenced, please see the Draft Wildlife Habitat Management Plan, February, 1987 (Plan 1).)

- Retain 55 acres of existing old-growth forest and manage 217 acres of forested land directly adjacent for late-successional wildlife species (same as Plan 1). Justification: Agencies identified old-growth forest as high priority habitat.
- Protect and enhance existing wetlands and establish 200-ft buffer zones around them (double size of buffer area in Plan 1). Justification: Agencies requested 200-ft buffer area around wetlands.
- Establish 100-ft buffer zones along major streams and 50-ft buffer zones along intermittent or non fish-bearing streams (similar to Plan 1). Justification: Agencies requested buffer zones this size.
- Preserve riparian lands along Sultan River to enhance old-growth forest characteristics for benefit of late-successional species (same as Plan 1). Justification: Agencies identified old-growth forest and riparian habitat high priority.
- Manage approximately 1,300 acres of second-growth forest on a modified 60-year rotation (same as Plan 1). Include snag management, green-tree leave unit, and dead and down woody material management programs to promote old-growth forest characteristics (described in Plan 1). Justification: Sixty-year rotation provides balance of mitigation for evaluation species. Agencies identified old-growth forest (characteristics) as high priority habitat.
- Retain approximately 303 acres of mature deciduous and mixed forest (do not actively convert to coniferous forest). Justification: This measure specifically requested by agencies.
- Add approximately 182 acres to the Lake Chaplain Tract (acreage will be obtained by City of Everett from DNR). Another 184 acres of newly acquired lands from DNR will also be included as a result of the exchange for 184 acres previously included in Plan 1. (Land exchange will be finalized in September, 1987). Manage newly acquired lands to optimize value for deer, grouse and chickadee. Justification: Agencies requested more mitigation for these three species.
- Access to the Lake Chaplain Tract will be as indicated on the map dated August 6, 1987 (approximately 1,100 acres within the hydrographic boundary closed to public access - see cross-hatched area, approximately 1,100 acres will be opened to public access).

E-134

70611

Lost Lake Tract

- District purchase Tract (205 acres) to prevent residential development (same as Plan 1). Justification: Agencies and public interested in preserving wildlife value on this tract.
- Protect existing lake and wetland (see draft plan for Lost Lake dated July 21, 1987, for details). Establish 200-ft permanent buffer zone (doubles size of wetland buffer area in Plan 1). Justification: Agencies requested 200-ft buffer zone around wetlands.
- Manage forested area to optimize value to deer, grouse and chickadee (see draft plan for Lost Lake dated July 21, 1987). Maintain in mixed forest cover type. Justification: Agencies requested more mitigation for these three species and more mixed forest.
- Provide two waterfowl nest boxes, three floating nesting islands, and one osprey nesting platform. Justification: Agencies specifically requested these measures be included in the plan.

Protect Facility Lands

- Pipeline right-of-way managed for early-successional species as per Plan 1.
- Powerhouse site managed for early-successional grass/shrub characteristics as per Plan 1.
- Transmission line right-of-way and wedge-shaped parcel managed for early-successional and mixed forest species as per Plan 1. Justification: Best use to balance out mitigation.

Spada Lake Tract

- Manage reservoir shoreline (elevation 1450 ft. to 1460 ft.) as permanent forested buffer zone. Justification: Best use overall for evaluation species.
- Manage deciduous riparian zone (elevation 1445 ft. to 1450 ft.) as permanent riparian buffer zone. Existing live trees and snags will be retained (except for snags causing water quality or safety hazard). Justification: Riparian habitat considered high priority by agencies.
- Conduct shoreline vegetation testing program and implement planting program if test results indicate planting is feasible (see Plan 1). Justification: Agencies specifically requested this measure be included in the plan.
- Provide two osprey nesting platforms. Justification: Agencies specifically requested this measure be included in the plan.

7060U

- Manage District and City lands around Spada Lake for wildlife, if and when they are obtained from the U. S. Forest Service in a land exchange. Management emphasis will be for black-tailed deer, with due regard for other species. Management will be compatible with the Recreation Plan. These lands will be open to public access except for Project operation facilities on and near Cuiaback Dam. It is estimated that at least 700 acres will be obtained in the exchange.

Williamson Creek Tract

- District purchase or lease Tract (352 acres) to prevent timber harvest (Same as Plan 1). Justification: Agencies identified old-growth forest as high priority habitat.
- Retain all existing old-growth forest stands. Justification: Old-growth forest considered high priority habitat by agencies.
- Retain riparian lands along Williamson Creek. Justification: Riparian habitat considered high priority by agencies.
- Retain existing wetlands. Justification: Wetlands considered high priority habitat by agencies.
- Retain all other forested areas. Justification: Management emphasizing old-growth forest (characteristics) considered high priority by agencies.

Monitoring Program

- Proposal submitted to agencies for review.

E-135

Plan 1 vs Plan 3 Revisions - Summary

<u>TRACT</u>	<u>ADDITIONS</u>	<u>DELETIONS</u>
<u>Lake Chaplain</u>	100' enlargement of wetland buffer zone (requested by agencies) Shift 138 acres to permanent mixed forest management from 60-year rotation (requested by agencies) New land (182 acres) added to wildlife mitigation plan and managed for deer, grouse and chickadee (additional mitigation for these three species requested by agencies)	Wetland development (9 acres) (Wetland mitigation will be 100% without development). Waterfowl nest boxes (11) (Measures for reservoir benefited species and mitigation measures not included in HEP were not considered high priority by agencies). Enhancement measures specific to reservoir benefited species (osprey, mallard, common merganser and beaver) except for direct wetland enhancement (same reasons as above). Perch sites along pipeline right-of-way (mistake in Plan 1).
<u>Lost Lake</u>	Increase area (width) of lake and wetland buffer zone (requested by agencies) Change management to optimize value to deer, grouse and chickadee and maintain mixed forest cover type (agencies requested increased management for these species and mixed forest)	NONE

<u>TRACT</u>	<u>ADDITIONS</u>	<u>DELETIONS</u>
<u>Project Facility Lands</u>	NONE	Perch poles for raptors and song birds will not be included (measures not included in HEP considered low priority by agencies).
<u>Spada Lake</u>	Most snags and dead and down woody material will be retained along shoreline except where causing wildlife, water quality or safety problem (mistake in Plan 1) → Manage lands around Spada Lake for wildlife, if and when they are obtained from U. S. Forest Service in a land exchange.	Willow and black cottonwood seedlings (or whips) and deer browse will not be planted on the Spada Lake Tract (planting of questionable feasibility). Waterfowl nest boxes and platforms (3) and osprey nest platforms (5) (2 osprey platforms will be included). Construction mitigation measures including retaining vegetation in the 1440 ft. to 1450 ft. zone and leaving snags in the reservoir were conducted previously. Mitigation for reservoir benefited species and measures not included in the HEP were considered low priority by agencies.
<u>Williamson Creek Tract</u>	NONE	NONE

Plan 2 vs Plan 3 Revisions - Summary

<u>TRACT</u>	<u>ADDITIONS</u>	<u>DELETIONS</u>
<u>Lake Chaplain</u>	NONE	NONE
<u>Lost Lake</u>	Waterfowl nest boxes (2) Floating nesting islands (3) Osprey nesting platform (1)	NONE
<u>Project Facility Lands</u>	NONE	NONE
<u>Spada Lake</u>	Osprey nesting platforms (2) Planting program in draw-down zone. Exchange lands, if and when they are obtained.	NONE
<u>Williamson Creek Tract</u>	NONE	NONE



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

September 21, 1987
PUD-17522

Mr. Roger Williams
District Ranger
U. S. Forest Service
Mt. Baker-Snoqualmie National Forest
Skykomish Ranger District
Skykomish, WA 98288

Dear Mr. Williams:

Jackson Project - FERC #2157
Mt. Baker-Snoqualmie National Forest
Annual Meeting - Skykomish District

This is to transmit our notes taken during the meeting/field trip on September 4, 1987, of the Sultan Basin and Jackson Hydroelectric Project. Unless we hear from you to the contrary, we will presume that these meeting notes (2 copies attached) satisfactorily reflect coverage of each subject.

Consider this letter your notice of change of official District representative for the Jackson Project. Mr. Martin Hatscher will now be the responsible official replacing Mr. Robert Schneider.

In closing, this is to re-affirm that we have mutually scheduled a meeting on land exchange for 0900, October 1, 1987, at the Jackson Project powerhouse, located at 116th St. N.E. (extended) about 2.5 miles north of the Town of Sultan.

Very truly yours,

ORIGINAL SIGNED BY R. G. METZGAR

Roy G. Metzgar
Environmental Coordinator

Attachment

cc: Sam Nagel, USFS (w/o attachment)

Henry M. Jackson Hydroelectric Project
Meeting Notes - U. S. Forest Service

Attachment to
District letter
of 9/21/87

Page 1 of 3

Date: September 4, 1987 (0800 - 1145)
Place: Sultan Basin field trip
Attendees: Roger Williams and Christine Arredondo - U. S. Forest Service
Chet Grimes, Nephí Johnson and Roy Metzgar - PUD
Purpose: Annual meeting, status report on Project "punch list" and familiarization with Sultan Basin and Project features for Arredondo.

A. Punch List - Status Report

Metzgar identified the following items with remaining work to be done and reported their status.

1. Bear Creek borrow pit reclamation - as reported before by the PUD to the FS, this will be done in the context of recreation plan site development. Pit reclamation work will provide material for developing the Nighthawk site.
2. Exhibit R - Recreation Plan - this item is FERC License Article 52. On Wednesday, September 2, the PUD conducted a field tour of recreation plan sites for consulting firms on the short-list in the selection process. Next, a RFP (Request for Proposals) will be issued to them. After evaluation of proposals submitted by these consultants, the PUD would select the one best qualified to prepare site development plans and construction contract specifications. The PUD hopes to have the best qualified firm selected by the end of September. Site evaluations and other field work would be conducted this year. Plans, drawings, contract specifications, etc., would be prepared late this year or early next, and a public works contract could be bid next Spring. Construction would occur during the next summer season.
3. Exhibit S - Wildlife Mitigation Plan - this item is FERC License Article 53. Yesterday, September 3, the PUD and City of Everett met with the U. S. Fish and Wildlife Service and Washington Department of Wildlife to continue discussion and review of the proposed plan. Ging (USFWS) and Engman (WDW) verbally accepted the plan represented by the summary (September 3, 1987 draft). A key element to resolving the public use/access issue on Project wildlife mitigation lands is to include Forest Service exchange lands at Spada Lake (est. 700 A). Therefore, the land exchange with the Forest Service has added significance and meaning to the co-licensees.

Metzgar inquired about the Forest Service biologist (replacement for Leslie Howard who was transferred recently) for reviewing the final draft of the wildlife mitigation plan. Williams replied that a person hadn't been assigned yet. He advised that his District

and the North Bend District would be adding and sharing a fishery biologist. A brief discussion followed regarding the resident fishery at Spada Lake.

4. Land Exchange - Metzgar reported that he had called Sam Nagel to reactivate the process for the land exchange. Nagel suggested a meeting for review of the situation as a basis to get going. He proposed several meeting dates. Williams agreed to attend this meeting to be held on October 1 at 0900 at the Jackson Project powerhouse. Metzgar will confirm with Nagel.
5. Spada Lake shoreline tree removal - Metzgar advised that the PUD's Wildlife Biologist, Bedrossian, has discussed this already with Williams. The plan is to leave most of the dead trees for wildlife habitat benefit as part of the wildlife mitigation plan. Some clearing work will be done in selected areas, to be specified later, where the debris blocks wildlife access to the shoreline. The shoreline area between the log boom and Culmback Dam will be cleared. No written statement or plan submittal will be made or is necessary until later when clearing/burning will be done. Williams confirmed the verbal report by Bedrossian and that plan for shoreline dead tree removal was acceptable to him. He added, however, that dead tree clearing should be done also at recreation sites. For the log boom area, Grimes mentioned the tree count showed that the volume was estimated by USFS to be about 3-4 cords of wood and explained the strategy for removal. After cutting and felling, the trees would be floated and towed to a small landing area at the right abutment of Culmback Dam. The trees would be piled and burned at that site unless the Forest Service wanted the wood salvaged for fire wood. A ramp for vehicular access to the site would be needed. A more feasible public access site for wood cutting would be the abandoned road on the south shore near the tunnel intake tower. However, Grimes preferred the right abutment site to keep branches, other debris, chain saw oil, etc., as far away as possible from the intake area.

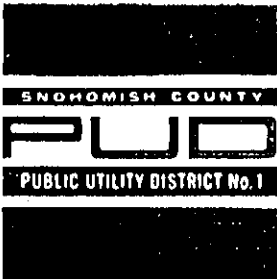
Williams agreed to the right abutment site and removal plan. The wood volume was too small for public fire wood cutting, so deck and burn it. Submit a written plan proposal to him and obtain the required burning permit from the Forest Service. Grimes advised that the work needs to be done while conditions are favorable for clearing, transporting and burning. If and when the reservoir fills above 1,440 ft., then it can't be done. Metzgar added that the work would have to be done after the fire hazard season.

6. Special Use Permit - Williams inquired about the PUD's response to the Forest Service permit. Metzgar replied that nothing had been done since last year's internal review. PUD staff efforts have been focused on other activities on the punch list. Williams advised that the Forest Service expects some progress to be made on it and a letter to that effect will be sent shortly to the PUD.

B. Other Items

1. Williamson Creek bridge turn-out (a former punch list item) - Williams asked if we had received his reply to the PUD's proposal? Metzgar affirmed receipt of it from the USFS.
2. North bank stabilization area landslide - Grimes explained considerations for dealing with it. One idea is to leave it along, another is to remove the sliding surficial material, or possibly lay-back the top of the hill further, and do drainage/runoff control at the top of the hill. Metzgar added that the PUD's original proposal for removing blowdown around the top of the hill above the benches was to use the equipment brought in to remove the slide and do repair work. However, the expected public works contract had been delayed.

Williams proposed a small timber sale to handle that, although the downed trees may have lost their market value. Metzgar asked how much time would be needed to prepare that sale, and Williams replied that this type wouldn't require a lengthy procedure.
3. Old log boom disposal - Williams asked about PUD plans for disposing of the first log boom now stored in the South Fork Sultan River arm of Spada Lake. Grimes replied that there was no disposal plan yet. The log boom had been retained for use in sweeping the lake when removing dead trees along the shoreline. Williams advised that removing the log boom from the lake wasn't a priority item but that the PUD should start thinking about doing it.
4. Landslide removal/road repair - Grimes asked about the status of a contract to repair the two slide areas on the Culmback Dam/Olney Pass road. Initially, the DNR advised the conditions were too wet; now the PUD is advised that conditions are too dry! Williams replied that he would check on the contract.
5. Project applicant's notice - Grimes asked if this meeting would constitute notice by the PUD to the Forest Service of project's pending or intended for the next year in lieu of written notice prior to October 1? Williams replied that it would, plus the meeting notes. Some fees may be charged for some work and some work may be grandfathered (exempted from service charge for Forest Service processing and participation).



2320 California St., Everett, Washington 98201 258-8211
 Mailing Address: P O Box 1107, Everett, Washington 98206
 September 25, 1987
 PUD-17538

Mr. Gary Engman
 Washington Dept. of Game
 Region 4
 16018 Mill Creek Blvd.
 Mill Creek, WA 98012

Mr. Joe Potter
 Department of Natural Resources
 919 North Township
 Sedro Moolley, WA 98284

Mr. Charles A. Dunn
 Field Supervisor
 U.S. Fish & Wildlife Service
 2625 Parkmont Lane S.W.
 Olympia, WA 98502

Mr. Roger Williams
 District Ranger
 U.S. Forest Service
 Mt. Baker-Snoqualmie Nat'l Forest
 Skykomish Ranger District
 Skykomish, WA 98288

Mr. David Somers
 Tulalip Tribes, Inc.
 6700 Totem Beach Road
 Marysville, WA 98270

Gentlemen:

**Jackson Project - FERC #2157
 License Article 53 - Time Extension Granted**

When the District sent Quarterly Progress Report No. 7 to the Federal Energy Regulatory Commission (FERC) on July 3, 1987 (PUD-17461), we also requested a nine-month extension of time to complete the wildlife habitat management plan. The FERC issued an Order on September 10, 1987, granting that request. A copy of that Order (Project No. 2157-024) is attached for your information and Project records.

Very truly yours,

ORIGINAL SIGNED BY R. G. METZGAR

Roy G. Metzgar
 Environmental Coordinator

Attachment

RGM:jk

cc: Bell & Ingram
 G. Ging, USFWS

802U

E-139

POP 16-3-4-3
 (Oct 58)
 16-3-7
 17528

RECEIVED	SEP 24 1987	JACKSON PROJECT
FILE		
NO		
COPY		
R. Schmitt (m)		
C. Jones (FOR)		
J. Johnson		
R. Martin		
C. Lang		
D. ...		
K. ...		

UNITED STATES OF AMERICA
 FEDERAL ENERGY REGULATORY COMMISSION
 Project No. 2157-024
 Public Utility District No. 1
 of Snohomish County and City
 of Everett, Washington
 ORDER GRANTING EXTENSION OF TIME
 (Issued September 10, 1987)
 On August 3, 1987, the licensees for the Henry M. Jackson License #2157-024, requested an extension of time to file the revised terrestrial resources management plan required by article 53.

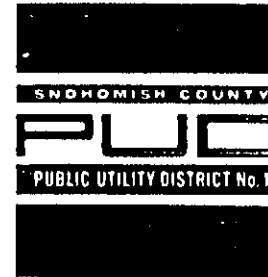
With their request for an extension of time, the licensees filed their quarterly progress report and the licensees report that they responded to comments on the initial draft of the revised plan from the U.S. Fish and Wildlife Service, the State of Washington Department of Wildlife, and the Forest Service. The licensees met with the agencies to discuss the comments and the agencies' significant progress has been made in finalizing the revised plan but major unresolved issues remain, including the policy regarding public access and use on licensee-owned lands adjacent to Lake Chaplain and the adequacy of the mitigation or avoidance measures proposed by the City Council of Everett and the Commissioner of the Public Utility District No. 1 of Snohomish County are required before a final revised plan can be submitted to the Commission. The licensees request for an additional month to finalize the revised plan is reasonable and should be granted.

In conjunction with this extension, you must continue to file a report with the Secretary of the Commission, every three months, indicating the progress that you have made in completing the plan. The reports should include a description of any completed work, the identification of any conferences or meetings, copies of any important correspondence, letters of consultation and studies or study conclusions, and a schedule for completing any remaining work.

DC-4-7

The Director orders:
 (A) The deadline for filing the revised terrestrial resources management plan is extended to May 31, 1988.
 (B) This order is issued under authority delegated to the Director and is final unless appealed to the Commission under Rule 1902 within 30 days from the date of this order.
 Fred E. Springer
 Acting Director
 Office of Hydroelectric Licensing

RECEIVED
OCT 30 1987
MANAGER'S OFFICE



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

October 2, 1987
PUD-17515

September 25, 1987

PUD 17544

Sultan Sportsmans Club
Post Office Box 637
Sultan, Washington 98294

Greetings:

Thank you for your public testimony and letter supporting the acquisition of Lost Lake.

While I believe you are correct that individual Commissioners expressed some interest in the possibility of controlled access fishing at Lake Chaplain, it is not the Board's intention to reopen the matter. The City of Everett, our co-licensee, is extremely reluctant to allow fishing at Lake Chaplain. We have supported their position with the agencies and in our final Mitigation Plan.

The plan has been relaxed to allow public access in the buffer area which meets your Club's goals to some extent. If you would like more detail on this aspect, please do not hesitate to call.

Once again, the Board appreciates your support.

Sincerely,

Board of Commissioners

Peter Newland
President

rlc

Mr. Gary Engman
Washington Dept. of Game
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Roger Williams
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Mr. Joe Potter
Department of Natural Resources
919 North Township
Sedro Woolley, WA 98284

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Charles A. Dunn
Field Supervisor
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
License Article 53 - Wildlife Habitat Management Plan
Settlement Offer

As a result of extensive staff-level consultations, primarily with the U. S. Fish and Wildlife Service and Washington Department of Wildlife, the co-licensees are ready to present an offer intended to fulfill the requirements of Project License Article 53 and Order paragraph (B) in 28 FERC ¶ 62,249 issued August 22, 1984 (with subsequent time extension) by the Federal Energy Regulatory Commission (FERC). The Order states that the Licensee shall file "a revised terrestrial resources mitigative plan to protect and enhance terrestrial resources in the Sultan Project area. The plan shall include, but not be limited to: (1) identification of the type of habitat to be used for replacement; (2) a determination of the location and number of acres of habitat to be used for replacement; (3) a schedule of implementation; and (4) a monitoring program to determine the effectiveness of the mitigative measures. Documentation of agency consultation on the mitigative plan, and agency comments on the adequacy of the plan, shall be included in the filing".

A summary of the wildlife habitat management plan package (Plan 3 as revised during September 3, 1987 consultation meeting) is presented (two

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COUNTY
PUBLIC
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DISTRICT
NO. 1

E-140

October 3, 1987
PUD-17515

copies enclosed) to the State and Federal agencies and Tulalip Tribes for their information and review. Note, during consultation, it was agreed that wildlife habitat management more accurately reflected the proposed action rather than terrestrial resources mitigation, hence the change in nomenclature. It was agreed also that it would not be necessary to prepare a final Habitat Evaluation Procedures (HEP) report. A comprehensive document presenting the details of the proposed plan is being prepared for agency review and subsequent transmittal to the FERC. Prior to preparation of the final plan document, however, it would be appropriate to have an indication of agency acceptance and comments, if any, on the enclosed plan summary.

The major features of the plan are:

- Lake Chaplain tract (2,200 acres) to be managed for wildlife habitat improvement;
- purchase of Lost Lake tract (205 acres) adjoining the Lake Chaplain tract to be managed for wildlife habitat improvement;
- Project Facility Lands (85 acres) managed for quality meadow, shrub, and open woodland habitat;
- Spada Lake tract including management of the reservoir shoreline and, when obtained from the U. S. Forest Service, an estimated 700 acres to be managed for wildlife habitat improvement, emphasizing black-tailed deer; and
- lease (or purchase) of Williamson Creek tract (352 acres) near Spada Lake to be managed for wildlife habitat improvement.

The plan will be implemented through the year 2060. Overall, about 3,650 acres of land will be managed for wildlife habitat improvement. Within that area, about 1,300 acres formerly closed to the general public for hunting access will now be open for public access and hunting. Additionally, 2,270 acres of water surface area are involved in the plan.

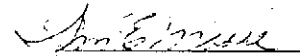
You are advised that during a public meeting held on September 1, 1987, the District's publicly elected Board of Commissioners approved adoption of the proposed plan. Their approval specified that the term "clearcut" should be replaced by another term that more adequately describes the habitat management techniques incorporated into the Plan. During the two public meetings, representatives from Snohomish Sportsmen's Association and Pilchuck Audubon Society commented on the proposed plan. They both encouraged acquisition of the Lost Lake Tract. The representative from Pilchuck Audubon Society preferred passive management for the tract. On September 30, 1987, the publicly elected City Council also took action approving the proposed plan.

The City of Everett and District request a written response from the agencies on the plan summary as the proposed offer to settle the terrestrial wildlife resources mitigation requirement of FERC License Article 53 and related Order 28 FERC ¶ 62,249. Your comments might address the requirements identified by that FERC Order, particularly the adequacy of the plan. It is mutually understood that any agency/tribal comments are conditional at this time pending a subsequent opportunity to review the detailed, comprehensive

October 3, 1987
PUD-17515

plan document. A lack of response by resource agencies and Tulalip Tribes to this request will be interpreted to mean concurrence with and acceptance of the summary document and agreement to proceed with preparing the final draft of the detailed comprehensive plan document. The deadline for your response to this offer is November 2, 1987.

Please address your response to the District. If any clarification should be needed about this request for agency/tribal comment on the plan summary, please confer with Karen Bedrossian at 347-4374.


Mayor Moore
City of Everett


Charles R. Earl
District Manager

Enclosure

cc: Bell & Ingram
Edson, FERC
Hunter, FERC
Ging, USFWS

Jackson Project - FERC #2157
License Article 53
WILDLIFE HABITAT MANAGEMENT PLAN PACKAGE (Plan 3)

This plan "package" (Plan 3) reflects consultations with the resource agencies from April through August, 1987.

Lake Chaplain Tract (For plan elements referenced, please see the Draft Wildlife Habitat Management Plan, February, 1987 (Plan 1).)

- Retain 55 acres of existing old-growth forest and manage 217 acres of forested land directly adjacent for late-successional wildlife species (same as Plan 1). Justification: Agencies identified old-growth forest as high priority habitat.
- Protect and enhance existing wetlands and establish 200-ft. buffer zones around them (double size of buffer area in Plan 1). Justification: Agencies requested 200-ft. buffer area around wetlands.
- Establish 100-ft. buffer zones along major streams and 50-ft. buffer zones along intermittent or non fish-bearing streams (similar to Plan 1). Justification: Agencies requested buffer zones this size.
- Preserve riparian lands along Sultan River to enhance old-growth forest characteristics for benefit of late-successional species (same as Plan 1). Justification: Agencies identified old-growth forest and riparian habitat high priority.
- Manage approximately 1,300 acres of second-growth forest on a modified 60-year rotation (same as Plan 1). Include snag management, green-tree leave unit, and dead and down woody material management programs to promote old-growth forest characteristics (described in Plan 1). Justification: Sixty-year rotation provides balance of mitigation for evaluation species. Agencies identified old-growth forest (characteristics) as high priority habitat.
- Retain approximately 303 acres of mature deciduous and mixed forest (do not actively convert to coniferous forest). Justification: This measure specifically requested by agencies.
- Add approximately 182 acres to the Lake Chaplain Tract (acreage will be obtained by City of Everett from DNR). Another 184 acres of newly acquired lands from DNR will also be included as a result of the exchange for 184 acres previously included in Plan 1. (Land exchange will be finalized in September, 1987). Manage newly acquired lands to optimize value for deer, grouse and chickadee. Justification: Agencies requested more mitigation for these three species.
- Access to the Lake Chaplain Tract will be as indicated on the map dated August 6, 1987 (approximately 1,100 acres within the hydrographic boundary closed to public access - see cross-hatched area, approximately 1,100 acres will be opened to public access).

Lost Lake Tract

- District purchase Tract (205 acres) to prevent residential development (same as Plan 1). Justification: Agencies and public interested in preserving wildlife value on this tract.
- Protect existing lake and wetland (see draft plan for Lost Lake dated July 21, 1987, for details). Establish 500-ft. buffer zone (wetland buffer area in Plan 1 was 100-ft., lake buffer area was 200-ft.). Justification: Agencies requested 200-ft. buffer zone around wetlands.
- Manage forested area to optimize value to deer, grouse and chickadee (see draft plan for Lost Lake dated July 21, 1987). Maintain in mixed forest cover type. Justification: Agencies requested more mitigation for these three species and more mixed forest.
- Provide two waterfowl nest boxes, three floating nesting islands, and one osprey nesting platform. Justification: Agencies specifically requested these measures be included in the plan.

Project Facility Lands

- Pipeline right-of-way managed for early-successional species as per Plan 1.
- Powerhouse site managed for early-successional grass/shrub characteristics as per Plan 1.
- Transmission line right-of-way and wedge-shaped parcel managed for early-successional and mixed forest species as per Plan 1. Justification: Best use to balance out mitigation.

Spada Lake Tract

- Manage reservoir shoreline (elevation 1450 ft. to 1460 ft.) as permanent forested buffer zone. Justification: Best use overall for evaluation species.
- Manage deciduous riparian zone (elevation 1445 ft. to 1450 ft.) as permanent riparian buffer zone. Existing live trees and snags will be retained (except for snags causing water quality or safety hazard). Justification: Riparian habitat considered high priority by agencies.
- Conduct shoreline vegetation testing program and implement planting program if test results indicate planting is feasible (see Plan 1). Justification: Agencies specifically requested this measure be included in the plan.
- Provide two osprey nesting platforms. Justification: Agencies specifically requested this measure be included in the plan.
- Manage District and City lands around Spada Lake for wildlife, if and when they are obtained from the U. S. Forest Service in a land exchange. Management emphasis will be for black-tailed deer, with due

regard for other species. Management will be compatible with the Recreation Plan. These lands will be open to public access except for Project operation facilities on and near Culmback Dam (specifically, intake tower, access shaft, control building and microwave building). It is estimated that at least 700 acres will be obtained in the exchange.

Williamson Creek Tract

- District purchase or lease Tract (352 acres) to prevent timber harvest (Same as Plan 1). Justification: Agencies identified old-growth forest as high priority habitat.
- Retain all existing old-growth forest stands. Justification: Old-growth forest considered high priority habitat by agencies.
- Retain riparian lands along Williamson Creek. Justification: Riparian habitat considered high priority by agencies.
- Retain existing wetlands. Justification: Wetlands considered high priority habitat by agencies.
- Retain all other forested areas. Justification: Management emphasizing old-growth forest (characteristics) considered high priority by agencies.

Monitoring Program

- Proposal as submitted to agencies for review on August 18, 1987, and revised during September 3, 1987 meeting. Three basic purposes of monitoring: 1) record plan activities; 2) measure effectiveness; and 3) report to agencies.
- Plan implementation supervision by a biologist.
- Snags.
- Dead and down woody material.
- Vegetation planting at Lake Chaplain.
- Vegetation plantings at Project facility lands.
- Buffer zones and green tree leave units.
- Black-tailed deer forage.
- Waterfowl nest boxes.
- Nesting islands.
- Osprey nesting platforms.
- Forestry management.
- Reporting annually through 1995 and every target year (5 years) thereafter.

E-143

Plan 1 vs Plan 3 Revisions - Summary

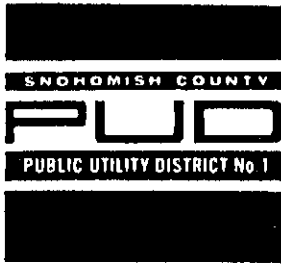
<u>TRACT</u>	<u>ADDITIONS</u>	<u>DELETIONS</u>
<u>Lake Chaplain</u>	<p>100' enlargement of wetland buffer zone (requested by agencies)</p> <p>Shift 138 acres to permanent mixed forest management from 60-year rotation (requested by agencies)</p> <p>New land (182 acres) added to wildlife mitigation plan and managed for deer, grouse and chickadee (additional mitigation for these three species requested by agencies)</p>	<p>Wetland development (9 acres) (Wetland mitigation will be 100% without development).</p> <p>Waterfowl nest boxes (11) (Measures for reservoir benefited species and mitigation measures not included in RFP were not considered high priority by agencies).</p> <p>Enhancement measures specific to reservoir benefited species (osprey, mallard, common merganser and beaver) except for direct wetland enhancement (same reasons as above).</p> <p>Perch sites along pipeline right-of-way (mistake in Plan 1).</p>
<u>Lost Lake</u>	<p>Increase area (width) of lake and wetland buffer zone (requested by agencies)</p> <p>Change management to optimize value to deer, grouse and chickadee and maintain mixed forest cover type (agencies requested increased management for these species and mixed forest)</p>	NONE

<u>TRACT</u>	<u>ADDITIONS</u>	<u>DELETIONS</u>
<u>Project Facility Lands</u>	NONE	Perch poles for raptors and song birds will not be included (measures not included in HEP considered low priority by agencies).
<u>Spada Lake</u>	Most snags and dead and down woody material will be retained along shoreline except where causing wildlife, water quality or safety problem (mistake in Plan 1) Manage lands around Spada Lake for wildlife, if and when they are obtained from U. S. Forest Service in a land exchange.	Willow and black cottonwood seedlings (or whips) and deer browse will not be planted on the Spada Lake Tract (planting of questionable feasibility). Waterfowl nest boxes and platforms (3) and osprey nest platforms (5) (2 osprey platforms will be included). Construction mitigation measures including retaining vegetation in the 1440 ft. to 1450 ft. zone and leaving snags in the reservoir were conducted previously. Mitigation for reservoir benefited species and measures not included in the HEP were considered low priority by agencies.
<u>Williamson Creek Tract</u>	NONE	NONE

Plan 2 vs Plan 3 Revisions - Summary

<u>TRACT</u>	<u>ADDITIONS</u>	<u>DELETIONS</u>
<u>Lake Chaplain</u>	NONE	NONE
<u>Lost Lake</u>	Waterfowl nest boxes (2) Floating nesting islands (3) Osprey nesting platform (1)	NONE
<u>Project Facility Lands</u>	NONE	NONE
<u>Spada Lake</u>	Osprey nesting platforms (2) Planting program in draw-down zone. Exchange lands, if and when they are obtained.	NONE
<u>Williamson Creek Tract</u>	NONE	NONE

F-11A



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

October 14, 1987
PUD-17567

Mr. Gary Engman
Washington Dept. of Game
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Roger Williams
District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Mr. Joe Potter
Department of Natural Resources
919 North Township
Sedro Woolley, WA 98284

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Charles A. Dunn
Field Supervisor
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Gentlemen:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Agency Meetings

The consultation meeting scheduled for October 15, 1987, has been cancelled. The consultants are in the process of revising the Wildlife Habitat Management Plan based on our previous consultation meetings and there is no need for another meeting at this time.

The next meeting will be on November 17, 1987, at the District's office in the Everett Business Park (building "A", room "A") at 9:45 a.m. In addition, a meeting has been scheduled for December 10, 1987, at the same location and time. Please mark this date on your calendars.

Very truly yours,

Karen L. Bedrossian
Karen L. Bedrossian
Environmental Coordinator/
Wildlife Biologist

KLB:jk
cc: C. Olivers
B. Lowell, City of Everett
G. Graves, City of Everett
G. King, USTWS



United States Forest Service
Department of Agriculture
Skykomish Ranger District
P.O. Box 305
Skykomish, Washington 98288

PNP 16-3-7

MANAGEMENT

NOV 1987

Reply to: 1560

Date: October 23, 1987

17605

Charles N. Earl
District Manager
Snohomish County Public Utility District No. 1
P.O. Box 1107
Everett, Washington 98206

Dear Mr. Earl,

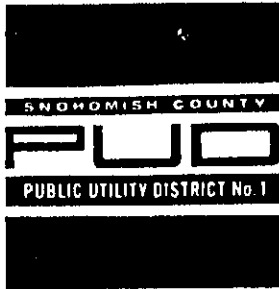
We have reviewed the Wildlife Habitat Management Plan for the Jackson Project, FERC #2157. We are in concurrence with the mitigation measures outlined in the summary document and are in agreement with proceeding to prepare the final draft of the detailed comprehensive plan document.

Roger W. Williams
ROGER W. WILLIAMS
District Ranger

RECEIVED	
JACKSON PROJECT	
NOV 4 1987	
	Orig Copy
A. Schneck	
C. Grimes	
N. Johnson	
R. Metzger	
C. Laps	
D. M.	
K. Bedrossian	
<i>Handwritten initials</i>	
File	

E-145





2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

November 10, 1987
PUD-17617

Mr. Gary Engman
Washington Dept. of Game
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Joe Potter
Department of Natural Resources
919 North Township
Sedro Woolley, WA 98284

Mr. Charles A. Dunn
Field Supervisor
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. Duane Simmons
Acting District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Gentlemen:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Agency Meetings

The consultation meetings scheduled for November 17 and December 10, 1987, have been cancelled. Except for the Forest Service, we did not receive any comments on the Settlement Offer (October 2, 1987) or the need for further consultation. Therefore, we are revising the Wildlife Habitat Management Plan based on our previous consultation meetings. Consequently, there is no need for further meetings until the final draft Plan is sent to you for final agency review. According to our schedule, you can expect to receive the Plan on or before January 4, 1988.

The next meeting will be on January 14, 1988, at the District's office in the Everett Business Park (building "A") at 9:45 a.m. Anyone from your organization who will be reviewing the Plan is encouraged to attend this

Resource Agencies

-2-

November 10, 1987
PUD-17617

meeting. Please mark this date on your calendars (or post this letter on your bulletin board so you will remember to put it on your 1988 calendar).

Very truly yours,

Karen Bedrossian

Karen L. Bedrossian
Environmental Coordinator/
Wildlife Biologist

KLB:jk

cc: C. Olivers, City of Everett
D. Lowell, City of Everett
G. Graves, City of Everett
D. Hays, Beak Consultants
M. Vaughn, Beak Consultants
G. Ging, USFWS
H. Perry, FERC
J. Hunter, FERC

E-146

SNOWHOMISH COUNTY

PUD

PUBLIC UTILITY DISTRICT No. 1

2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

December 8, 1987
PUD-17637

Mr. William J. Wallace
Assistant Area Manager
Department of Natural Resources
Northwest Area
919 N. Township St.
Sedro Woolley, WA 98284

Dear Bill:

Jackson Project - FERC #2157
Wildlife Habitat Management Plan
Williamson Creek Tract

The District wishes to obtain control of the Williamson Creek Tract (see Attachment 1) as part of the Jackson Project Wildlife Habitat Management Plan (Plan). A copy of the timber cruise you requested (letter dated April 29, 1987) is enclosed (Attachment 2). The cruise was conducted in accord with directions from your department (letter dated September 8, 1986).

E-1147
As you may recall, the Williamson Creek Tract is one of five tracts included in the Plan. A settlement offer was sent to the resource agencies on October 2, 1987. The District received only one response, which was from the U. S. Forest Service (USFS) and encouraged us to proceed with the Plan. The District interprets the response from USFS and lack of response from the other agencies and Tribes as further confirmation of the verbal acceptance of the Plan in September, 1987. In addition, the District Board of Commissioners and the Everett City Council have approved the Plan. A Final Plan draft will be submitted to the agencies and Tribes in early January. Therefore, we are ready to proceed with the steps necessary to obtain control of the Williamson Creek Tract, either by lease or acquisition.

In your letter dated April 29, 1987, you requested that the District act on our preferred option of lease or acquisition by December 31, 1987. We have not yet made a determination of our preference and request that you continue to defer management plans on the Tract. We hope that the previous information provides adequate evidence of the credibility of our intentions. We have conducted an appraisal for use in determining a mutually acceptable strategy for transferring control of the Tract to the District.

Mr. William J. Wallace
Dept. of Natural Resources

-2-

December 8, 1987
PUD-17637

Thank you for your assistance and cooperation on the Williamson Creek Tract and Plan development. We sincerely appreciate it and look forward to hearing from you soon.

Very truly yours,

ORIGINAL SIGNED BY
M. HATSCHER
Martin Hatscher
Acting Director, Power Management

Attachments

KLB:jk

cc: J. Potter, DNR
D. Farwell, DNR
G. Engman, WDW (w/o Attachment 2)
C. Dunn, USFWS (w/o Attachment 2)
G. Ging, USFWS (w/o Attachment 2)
D. Simmons, USFS (w/o Attachment 2)
D. Somers, Tribes (w/o Attachment 2)
C. Olivers, City
H. Perry, FERC (w/o Attachment 2)
J. Hunter, FERC (w/o Attachment 2)



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement
2625 Parkmont Lane S.W., Bldg. B
Olympia, Washington 98502

December 21, 1987

Mr. Charles N. Earl, District Manager
Snohomish County Public Utilities District
P.O. Box 1107
Everett, Washington 98206

Re: Jackson Project - FERC 2157, Wildlife Habitat Management
Plan - Settlement Offer

Dear Mr. Earl:

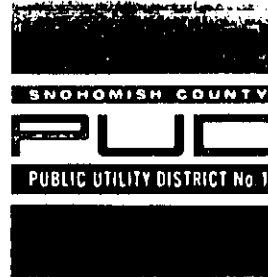
The Draft Wildlife Habitat Management Plan, as described in your
October 2, 1987 letter, is acceptable to the U.S. Fish and
Wildlife Service. We appreciate the effort that has been
expended in the development of this mitigation plan by the
District and your consultant, BEAK, Inc. In particular, we wish
to express our appreciation to Ms. Karen Bedrossian and Mr. Roy
Metzgar of your staff and Mr. Marty Vaughn (BEAK) for being
responsive to our comments and recommendations and for their part
in resolving many issues that had previously held up reaching
agreement on a mutually acceptable mitigation plan for wildlife.

Sincerely,

Charles A. Dunn
Charles A. Dunn
Field Supervisor

cc: WDF, Engman
Tulalip Tribes
USFS, Roger Williams, Skykomish

RECEIVED
JACKSON PROJECT
JAN 4 1988
Table with columns for Name, Date, and Copy



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206
January 4, 1988
PUD-17665

Mr. Gary Engman
Washington Dept. of Wildlife
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Duane Simmons
Acting Skykomish District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish, WA 98288

Mr. Joe Potter
Department of Natural Resources
919 North Township
Sedro Woolley, WA 98284

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Charles A. Dunn
Field Supervisor
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. Lawrence Waters
Drinking Water Operations
Dept. of Social and Health Services
217 Pine St., Suite 220, B17-12
Seattle, WA 98101-1549

Mr. Robert Pekich, Director
Environmental Health Division
Snohomish County Health District
Courthouse
Everett, WA 98201

Mr. Jim West
Washington Dept. of Labor and Industry
Safety and Health
300 West Harrison
Seattle, WA 98119

Gentlemen:

Jackson Project - FERC #2157
License Article 53 - Wildlife Habitat Management Plan
Final Draft

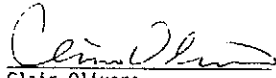
A copy of the final draft of the Wildlife Habitat Management Plan is
enclosed for your review. This document is the result of our extensive
staff-level consultations, primarily with the U. S. Fish and Wildlife Service
and Washington Department of Wildlife. The Plan is intended to fulfill the
requirements of Project License Article 53 and Order paragraph (B) in 28 FERC
62,249 issued August 22, 1984 by the Federal Energy Regulatory Commission
(FERC). The Order states that the Licensee shall file "a revised terrestrial
resources mitigative plan to protect and enhance terrestrial resources in the
Sultan Project area. The plan shall include, but not be limited to:
(1) identification of the type of habitat to be used for replacement; (2) a
determination of the location and number of acres of habitat to be used for
replacement; (3) a schedule of implementation; and (4) a monitoring program to
determine the effectiveness of the mitigative measures. Documentation of
agency consultation on the mitigative plan, and agency comments on the
adequacy of the plan, shall be included in the filing".

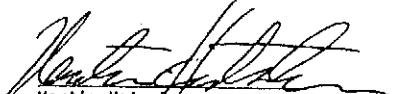
E-148

January 4, 1988
PUD-17665

Please address your review comments to the District. A lack of comment by resource agencies and Tulalip Tribes will mean concurrence with and acceptance of the final draft of the Plan. No comment will also mean your agreement to proceed with preparing the Plan for submittal to the FERC. Please recall the FERC Order requirement that "agency comments on the adequacy of the Plan shall be included in the filing". The deadline for your comments on the enclosed Plan is February 12, 1988.

A meeting has been scheduled for January 14, 1988, at 9:45 a.m., to discuss the Plan and answer questions to assist your review. This meeting will be at the District's office in the Everett Business Park (Bldg. A), 9930 Evergreen Way, Everett. If you have any questions before then, please confer with Karen Bedrossian at 347-4374.


Clair Olivers
Utilities Superintendent
City of Everett

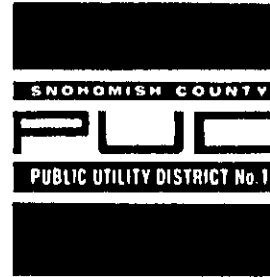

Martin Hatscher
Acting Director, Power Management
Snohomish County P.U.D.

Enclosure
KLB:jk

cc: Bell & Ingram
G. Ging, USFWS
Plumb, FERC (letter only)

E-149

7901



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206
February 2, 1988
PUD-17702

Mr. Gary Engman
Washington Dept. of Wildlife
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Mr. Duane Simmons
Acting Skykomish District Ranger
U.S. Forest Service
Mt. Baker-Snoqualmie Nat'l Forest
Skykomish Ranger District
Skykomish, WA 98288

Mr. Joe Potter
Department of Natural Resources
919 North Township
Sedro Moolley, WA 98284

Mr. David Somers
Tulalip Tribes, Inc.
6700 Totem Beach Road
Marysville, WA 98270

Mr. Charles A. Dunn
Field Supervisor
U.S. Fish & Wildlife Service
2625 Parkmont Lane S.W.
Olympia, WA 98502

Mr. Herb Williams
Industrial Safety Consultant
Washington Dept. of Labor & Industries
Division of Safety and Health
Evergreen Way Business Center
8625 Evergreen Way, #250
P. O. Box 67
Everett, WA 98206

Gentlemen:

Jackson Project - FERC #2157
Draft Wildlife Habitat Management Plan
Agency Meeting Summary

A summary is enclosed of the January 14, 1988 meeting held to discuss the final draft of the Wildlife Habitat Management Plan to assist agency representatives with their final review prior to submitting the plan to the FERC. If you have any comments on the meeting or meeting summary, please contact Karen Bedrossian.

Final written comments on the final draft of the plan are due by February 12, 1988. We have received written approval of the plan from the public health agencies (enclosures - 2).

Very truly yours,

ORIGINAL SIGNED BY R. G. METZGAR

Roy Metzgar
Sr. Hydro. Environmental Specialist

Enclosure (3)
RGM/KLB:jk

cc: C. Olivers, City of Everett
D. Lowell, City of Everett
G. Graves, City of Everett

G. Ging, USFWS
M. Vaughn, Beak Consultants
D. Hays, Beak Consultants

725T

PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY
AND
CITY OF EVERETT, WASHINGTON
JACKSON PROJECT - FERC NO. 2157
LICENSE ARTICLE 53
TERRESTRIAL RESOURCE MITIGATION PLAN

Agency Meeting Summary

Date: January 14, 1988
Place: Public Utility District No. 1 of Snohomish County (District)
Everett Business Park
Attendees: Gary Engman - Washington Department of Wildlife (WDW)
Gwill Ging - U. S. Fish and Wildlife Service (USFWS)
Herb Williams - Washington Department of Labor and
Industries (WDLI)
Gary Graves - City of Everett (City)
Roy Metzgar - District
Karen Bedrossian - District
Dave Hays - Beak Consultants Incorporated (Beak)
Marty Vaughn - Beak

I. PURPOSE

Familiarize agency representatives with the Final Draft Wildlife
Habitat Management Plan (Plan) and assist their review of the Plan
(Agenda attached).

II. WILDLIFE MITIGATION PLANNING - UPDATE

Bedrossian reviewed the background of the Project and Plan for the
benefit of Williams (WDLI). She also stated that this draft of the
Plan includes all changes discussed since the February 1987 draft. The
Plan has been approved by the City and District. Agency comments on
the Plan are due February 12, 1988. Written comments will be included
in the final Plan.

III. DISCUSSION OF THE PLAN

Bedrossian discussed each chapter of the Plan. She explained the
reorganization of the document, including new sections summarizing the
HEP assessment and expanded activity schedules. The habitat
enhancement techniques were moved from the appendix in the February,
1987 draft to a separate chapter in the document. She also explained
that the economic analysis has not been completed, but will be included
in the final Plan.

Metzgar noted that a decision to purchase or lease the Williamson Creek
Tract has not yet been made.

Ging wondered how a purchase or lease agreement would affect the Plan.
If a lease arrangement does not provide adequate protection for
wildlife, the tract should be purchased.

Williams pointed out that forest land owners are typically required to
provide access to adjacent land owners if it is needed to manage or
harvest timber, and this should be considered as a potential at
Williamson Creek regardless of whether it is purchased or leased.

Metzgar suggested that Ging include his concerns in his written
comments.

Vaughn summarized the two major concerns relating to Williamson Creek:
1) the District must have control over the land to ensure
implementation of the Plan and 2) the District must also have the
authority to prevent conflicting uses of the land.

Bedrossian discussed the appendices and asked Ging and Engman if they
need to review Appendix F, the Forest Resources Inventory Report. Both
Ging and Engman said that they would like a copy of Appendix F with the
final Plan, but they do not need to review it at this time.

Williams wanted assurance that Appendix F was not the "final word" on
forest activities. He was assured by the District that site specific
plans would be developed prior to harvest.

Metzgar commented that new WDLI and U.S. Forest Service (USFS)
participants should be added to the list on page vii.

Bedrossian commented that Spada exchange lands are now mentioned in the
Plan (see Spada Lake Tract).

Ging asked what might be the upper limit of lands that will be acquired
by the co-licensees?

Metzgar replied that the boundaries have not yet been determined, but
it appears that the DNR is willing to accept lands outside the road on
the south shore of the reservoir and lands in sections 20 and 21 north
of the reservoir. The co-licensees would like to own as little land as
possible. A meeting scheduled for February 4, 1988 may finalize the
ownership pattern, and a more accurate acreage estimate may be
available afterward.

Bedrossian commented that judging from the previous discussions that
Metzgar mentioned, we have estimated that the City and the District
would acquire at least 700 acres.

Vaughn explained the monitoring plan, schedules and reporting.

Bedrossian requested all parties to please read Appendix C, Regulatory
Requirements, to make sure all requirements have been covered
adequately. She commented that the Plan is consistent with the
October, 1987 Settlement Offer and if anyone was unsure where a
particular item was in the Plan to ask her.

IV. QUESTIONS

Hays explained the snag program and the procedure for locating green tree clumps.

Williams commented that safety considerations may require the elimination of green tree clumps in future rotations if clumps are not carefully located during the initial harvest.

V. SUMMARY

Bedrossian summarized the meeting and asked agency representatives how many copies of the final Plan they will need.

Engman said MDW will need four copies of the main document and one set of appendices.

Ging said that USFWS will need only one complete set.

Graves said that the City will need two complete sets and two additional copies of the main document.

VI. NEXT MEETING

It was agreed that another meeting was not needed. Bedrossian reminded participants that comments are due February 12, 1988.

JACKSON PROJECT - FERC #2157

WILDLIFE MITIGATION PLAN - AGENCY MEETING

January 14, 1988

A G E N D A

- I. Purpose of Meeting
- II. Wildlife Mitigation Planning Update
 - Brief Review
 - Progress since September
 - Comments due February 12, 1988
- III. Discussion of the Plan
 - Organization
 - Consistent with Settlement Offer
 - Regulatory Requirements - Appendix C
- IV. Questions
- V. Summary
 - Comments due February 12, 1988
- VI. Next Meeting

E-151

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18



**SNOHOMISH
HEALTH
DISTRICT**

M. WARD HINDS, M.D., M.P.H.
Health Officer

DISTRICT MEMBERS

COUNTY
Snohomish

CITIES AND TOWNS

Arlington
Brier
Darrington
Edmonds
Everett
Gale Bar
Granite Falls
Index
Lake Stevens
Lynnwood
Marysville
Mill Creek
Monroe
Mouatt's Terrace
Shelford
Snohomish
Snohomish
Sullivan
Woodway

E-152

SNOHOMISH HEALTH DISTRICT
Courthouse
Everett, WA 98201

GENERAL INFORMATION	338-5200
ADMINISTRATION	338-5210
MAIN CLINIC	338-5270
TUBERCULOSIS CLINIC	338-5225
PUBLIC HEALTH NURSING	338-5230
CAMPED CHILDREN'S SERVICES	338-5240
ENVIRONMENTAL HEALTH	338-5290
FOOD PROGRAM	338-5260
SANITATION PROGRAM	338-5270
VITAL STATISTICS	338-5280
SOUTH COUNTY CLINIC	338-5527
EAST COUNTY CLINIC	338-5021

PNP 16-3-7
17673

A. N. SIMPSON
Secretary



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
217 Pine Street, Suite 220, B37-12 • Seattle, Washington 98101-1-29

January 19, 1988

January 7, 1988

Martin Hatscher
Acting Director, Power Management
Snohomish County P.U.D.
P.O. Box 1107
Everett, Washington 98206

Martin Hatscher
Acting Director, Power Management
Snohomish County PUD
P.O. Box 1107
Everett, Washington 98206

Subject: Jackson Project - FERC #2157
License Article 53
Wildlife Habitat Management Plan
Final Draft

Subject: Jackson Project - FERC #2157
License Article 53 - Wildlife Habitat
Management Plan - Final Draft

Dear Mr. Hatscher:

Dear Mr. Hatscher:

The Snohomish Health District concurs with and accepts the final draft of the Wildlife Habitat Management Plan for the Henry M. Jackson Hydroelectric Project.

The subject plan, as written, looks acceptable to us. From our perspective, that's about half of the task. The other half is making it all work over the next 20-60 years, while realizing the desired water quality protection issues.

In view of that perspective we will be looking for timely project evaluation reports that clearly demonstrate the impacts (or lack thereof) of the planned activities. I would hope that this information will be interesting and helpful to many individuals and groups in the coming years.

Sincerely,

We appreciated the opportunity to be active in this project. I can be reached at 464-7673 or 464-7670 with any questions or comments.

Robert A. Pekich
Robert A. Pekich, Director
Environmental Health Division

Sincerely,

Lawrence W. Waters
Lawrence W. Waters, P.E.
District Engineer
NW Drinking Water Operations

RAP:dmb

LWW:cb

cc: Clair Olivers, Utilities Superintendent - City of Everett
Snohomish Health District

SEARCHED	
SERIALIZED	
INDEXED	
FILED	
JAN 11 1988	
FBI - SEATTLE	
RECEIVED	
DATE	
TIME	
BY	
REMARKS	
FILE NO.	

WILLIAM F INGRAM
DOUGLAS L BELL
STEVEN D UBERTI
JAMES H JONES JR
LOANA L BIGSBY
BRUCE R BELL
ALLEN H SANDERS
DAVID B CARSON
TRACY G WAGGONER

LAW OFFICES OF
BELL & INGRAM
A PROFESSIONAL SERVICE CORPORATION
WALL STREET BUILDING SUITE 1000
2830 METHUEN AVENUE
P O BOX 1760
EVERETT WASHINGTON 98204

111124
LEWIS A BELL (1982)
EVERETT (206) 258-0241
SEATTLE (206) 767-3673
TELECOPIER (206) 339-8450



WASHINGTON STATE DEPARTMENT OF
Natural Resources

Ph: (206) 856-0083

BRIAN BOYLE
Commissioner of Public Lands

February 10, 1988

Northwest Area
919 N. Township St
Sedro Woolley, WA 98284

February 11, 1988

Mr. Martin Hatscher
Acting Director, Power Management
Snohomish County Public Utility District #1
P.O. Box 1107
Everett, WA 98206

Re: Tulalip Tribes Comments on Final Draft
of Wildlife Habitat Management Plan

Dear Mr. Hatscher:

I am writing to confirm our February 10, 1988 conversation in which I advised that I have now received comments upon the draft Wildlife Plan from Tulalip Tribal staff.

However, I will be out of town on February 11, 1988 in Friday Harbor, and will not have the opportunity to complete review of the same and get approval from Tribal officials until February 12, 1988 at the earliest. If I can get it done the 12th, I will have the comments to you then. Otherwise, I would not be able to get Tribal officials approval until February 16, 1988, since the 15th is a holiday. In such case, I will have them to you on the 17th or 18th.

Please do not presume that failure to submit comments by the 12th implies concurrence by the Tulalip Tribes.

Thank you for your courtesies in agreeing to this schedule.

Very truly yours,

BELL & INGRAM, P.S.

James H. Jones, Jr.
James H. Jones, Jr.

JHJ/dt
cc: Tulalip Tribes of Washington

SEARCHED	
SERIALIZED	
FEB 11 1988	
INDEXED	
FILED	
FEB 11 1988	
EVERETT, WA	
R. Scott	
C. Jones	
N. Jones	
R. Meyer	
C. L. Jones	
D. Jones	
K. Jones	
M. Hatscher	

Mr. Martin Hatscher
Acting Director, Power Management
Snohomish County PUD
P. O. Box 1107
Everett, Washington 98201

Dear Mr. Hatscher:

Thank you for the opportunity to review the January, 1988 draft of the Jackson Project "Wildlife Habitat Management Plan". I would like to offer the following comments:

- Section 3.3 indicates PUD's intent to manipulate surface vegetation types for wildlife habitat on the pipeline R/W. My interpretation of the wording in the easement granted by Department of Natural Resources to Snohomish County PUD is that the right to manipulate vegetation types was not conveyed to PUD except where such vegetation is incompatible with the pipeline. The right to manipulate wildlife habitat might be available under terms of a lease.
- Appendix C, "Regulatory Requirements". Other statutes may be applicable under RCW 70.94, 76.04, 79.94, 7B, 84, and 17; and WAC 332, 173, and 222, which relate to Forest Protection, Burning, Smoke Management, Forest Chemicals and Taxation.

Other statutes may apply if surface mining or oil and gas development is anticipated.

- Appendix C, Table C-1 is misleading. The classes of forest practices and permit requirements are overly simplistic and do not reflect the statutory responses to environmentally sensitive situations. I suggest the table be eliminated from the text. Application requirements could be sorted out at an annual meeting at which DNR and PUD could present plans for management activities anticipated in the area.

Thank you again for the opportunity to comment.

Sincerely,

Jos Potter Boyle
Jos Potter
Rivers District Manager

JP:ts

OLV:ts436, Ls#8

E-153



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement
2625 Parkmont Lane SW, Bldg B
Olympia, Washington 98502
206/753-9440 FTS 434-9440

February 12, 1988

Mr. Martin Hatscher
Acting Director, Power Management
Snohomish County PUD
P.O. Box 1107
Everett, Washington 98206

Re: Jackson (Sultan) Project - FERC 2157
Wildlife Habitat Management Plan

Dear Mr. Hatscher:

We have reviewed your consultant's draft report entitled, "Wildlife Habitat Management Plan" (Plan) - Henry M. Jackson Hydroelectric Project, and conclude that it satisfies our concerns regarding the mitigation of project impacts to wildlife.

We wish to acknowledge our appreciation of the District and Beak Consultants, Inc. for their cooperative attitude during the last two years at addressing our concerns and taking a positive approach toward resolving several crucial issues. We are pleased with the level of detail contained in the document which is essential if the Plan is to be successfully implemented.

As noted in chapter 7 of the Plan and discussed during the January 14, 1988 meeting, the economic analysis is in the process of being revised and will be included in the final Plan. Our concern, which we presented at the meeting, is directed at the District's approach for acquiring control of the mitigation lands. It is our understanding that economic factors will have a bearing on whether control of the proposed mitigation lands not already owned by the District or the City of Everett will be gained through fee title acquisition or through easements. We prefer fee title acquisition because it provides for a greater certainty of control. We are concerned that control of the mitigation area through easements may not provide for exclusive use which could result in reduced effectiveness and flexibility of the habitat management program, and restricted public access. If the District chooses the easement approach, we must have assurance that the effectiveness of the Plan will not be reduced because of conflicting uses.

In summary, we are satisfied with the District's Wildlife Habitat Management Plan and look forward to its implementation and subsequent evaluation of its effectiveness through the monitoring program.

Sincerely,

Jay F. Watson
Acting Field Supervisor

cc: WDW, Bothell (Engman)
Tulalip Tribes (Somers)
USFS, Skykomish (Simmons)

E-154



THE TULALIP TRIBES

8700 TOTEM BEACH ROAD
MARYSVILLE, WA 98270
853-4585

The Tulalip Tribes are the successors
in interest to the Snohomish,
Snoqualmie and Skykomish tribes
and other tribes and bands signatory to
the Treaty of Point Elliott

Board of Directors:
Stanley G. Jones, Sr., Chairman
Bernard W. Gobin, Vice-Chairman
Dawn E. Simpson, Secretary
Stanley G. Jones, Jr., Treasurer
Donald C. Hatch, Jr., Member
Debra L. Posey, Member
Roy E. Hatch, Member
Clarence H. Hatch, Executive Director

February 12, 1988

Snohomish County Public Utility District #1
2320 California Street
P.O. Box 1107
Everett, WA 98206

Attention: Mr. Martin Hatscher

RE: Tulalip Tribes Comments on Final Draft of Wildlife Habitat
Management Plan

Dear Mr. Hatscher:

The Tulalip Tribes have reviewed the draft Wildlife Habitat
Management Plan for the Henry M. Jackson Hydroelectric Project
and would like to submit the following comments.

The Sultan River Basin, which was inundated after the construc-
tion of Culmbach Dam in 1965, was historically an important
hunting and gathering place for ancestors of the Tulalip Tribes.
The Sultan Basin provided a prime summer hunting area for deer
and elk which were evidently present in large numbers.
Inundation of the valley in 1965 destroyed approximately 750
acres of this hunting area and further severely reduced the
general availability of lowland valley habitat in the area.
Further losses to wildlife habitat and hunting area occurred in
1983 when Culmbach Dam was raised by 62 feet. Total loss of
area to the reservoir is estimated to be 1870 acres. Additional
losses have occurred through the construction and maintenance of
other project facilities.

The Tulalip Tribes have treaty secured hunting and fishing
rights under the Treaty of Point Elliott, which states:

"The right of taking fish at Usual and Accustomed grounds
and stations if further secured to said Indians in common
with all citizens of the Territory, and of erecting
temporary houses for the purpose of curing, together with
the privilege of hunting and gathering roots and berries on
open and unclaimed lands."

Feb. 12, 1988
Page 2.

No compensation for wildlife and hunting losses has occurred
until this time.

As tribal representatives have indicated to you verbally in past
meetings on this issue, prime concerns of the Tulalip Tribes are
to secure unpaired access to hunting areas, to mitigate for
past losses of habitat and hunting area, and to ensure no
further loss of either hunting areas or wildlife habitat.

The draft plan is deficient in meeting these goals in several
respects:

1. The plan does not guarantee access to "mitigation"
lands by the Tribes for purposes of hunting, fishing,
or other Treaty protected activities.
2. The plan does not adequately address the permanent
security of "mitigation" lands. Specifically,
provisions for the permanent acquisition of mitigation
tracts must be included in the plan.
3. The areas inundated in 1965, and the additional areas
inundated in 1983, were "open and unclaimed lands" and
thus were subject to the Tribes' rights under the
Treaty to hunt and gather roots and berries on these
lands. The draft plan does not contain provisions to
adequately assure that the "mitigation" lands will also
be "open and unclaimed" within the meaning of the
treaty language, or provisions to assure that it
remains so in perpetuity. The Tulalip Tribes believe
that the mitigation plan, and the implementing FERC
order, should contain specific language to assure that
the mitigation land will be, and will remain in
perpetuity, public lands which are "open and unclaimed"
within the meaning of the Treaty, and also contain
provisions to make this determining binding upon the
State of Washington as well as the PUD. The Tulalip
Tribes believe it would be appropriate for the PUD to
provide such assurances itself, and agree to an
implementing order so indicating, and to obtain such
assurances and agreement to an implementing order so
indicating from the State.

Assuming you are successful in obtaining the State of
Washington's concurrence, the following language in the plan and
implementing order might be useful:

"All areas set aside for mitigation under this mitigation
plan shall be deemed, and are, "open and unclaimed land" as
that phrase was used in the Treaty of Point Elliott, 12
Stat. 927. The Tulalip Tribes of Washington, as successors
in interest to the tribal signatories to that Treaty, are

1-15

Feb. 12, 1988
Page 3.

United States Forest North Bend 42404 SE North Bend Way
Department of Service Ranger District North Bend WA 98045
Agriculture
Caring for the Land and Serving People

entitled to exercise fishing, hunting and gathering rights guaranteed by that Treaty within these mitigation areas in perpetuity. This determination shall be binding upon the licensees and upon the State of Washington, which has intervened in these proceedings through various state agencies."

Reply To: 2600

Date: February 16, 1988

The Tribe also believes that similar language should be contained in an agreement to be signed by the PUD, the State (through appropriate officials), and the Tribe so as to assure it is binding upon that State.

Mr. Martin Hatscher
Snohomish County Public Utility District
P.O. Box 1107
Everett, WA 98206

4. We believe there should be additional areas within the Lost Lake Chaplain tracts which are managed for return to "old growth" condition -- i.e., left essentially unmanaged and unharvested.
5. The inundated areas were also important traditional religious and ceremonial areas for the Tulalip Tribes of Washington. The plan should contain provisions to assure tribal access to the "mitigation lands" for traditional religious and ceremonial purposes.

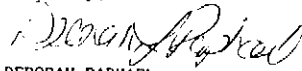
Dear Mr. Hatscher:

I am the new Earth Sciences Officer at North Bend Ranger District. My responsibilities include wildlife management on both the North Bend and Skykomish Ranger Districts.

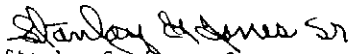
I have reviewed the Wildlife Habitat Management Plan for the Henry M. Jackson Hydroelectric Project. From a wildlife management standpoint it is a well written and comprehensive plan. I feel comfortable with the information presented, and the monitoring plan.


We believe, however, that with adequate correction of these deficiencies, the proposed mitigation plan can become acceptable. We therefore, suggest you include provisions for permanently securing unimpaired access to mitigation tracts by tribal members for the purposes of hunting and gathering, and including additional unmanaged areas with the Lost Lake and Lake Chaplain tracts.

Sincerely,


DEBORAH RAPHAEL
Earth Sciences Officer

Sincerely,
THE TULALIP TRIBES


Stanley G. Jones, Sr.
Chairman


Francis Sheldon
Deputy Director, Fisheries

SGJ/lh

E-156



STATE OF WASHINGTON
DEPARTMENT OF LABOR AND INDUSTRIES

February 26, 1988

Ms. Karen Bedrossian
Mr. Roy Metzgar
Snohomish County Public Utility District No. 1
P. O. Box 1107
Everett, WA 98206

Dear Ms. and Sir:

In review of Draft Copy of Henry M. Jackson Hydroelectric Project for Wild. life Habitat Management Plan, the following concerns should be considered. Reference to 2.3 section -

1. When a snag tree is found to be decayed to a state where it will be lost, a system of removal with explosives is needed for protection of persons who monitor and public which may enter these areas. Use of explosives to down these snags is the only safe way of removal.
2. Any advisor language when it relates to logging safety needs removal from draft. (Page 2-16). Next to last paragraph Skid trails "should" change to may not be located near snags and must be distance away equal to height of snag tree.

Section 4 - Page 4-1. Insert this notation with present statement. "Safety concerns for personnel monitoring and managing this snag program will be deciding factor in all decisions".

Appendix C

Safety Standards for Logging Operators - WAC 296-54

Applicability

Leave present statement but add "Each logging site shall be evaluated by Washington Department of Labor & Industries, Division of Industrial Safety and Health prior to final sale plan and all parties will agree to snag tree plan for each individual sale site. Safety of workers will be deciding factor for adopted plan."

This concludes my suggestion for this draft.

If you have any questions in regard to changes or additions, please contact me.

Sincerely,

Herb Williams
Industrial Safety Engineer Consultant
(206) 339-1957

E-157



JACK S. WAYLAND
Director

STATE OF WASHINGTON

DEPARTMENT OF WILDLIFE

Region Four Office -- 16018 Mill Creek Boulevard, Mill Creek, WA 98012 -- (206) 775-1311

March 1, 1988

Martin Hatscher, Acting Director
Power Management
Snohomish County PUD
P.O. Box 1107
Everett, Washington 98206

Re: Wildlife Habitat Management Plan, Henry M. Jackson Hydroelectric
Project, Final Draft

Dear Mr. Hatscher:

We have reviewed this second draft plan and approve it for implementation to mitigate the terrestrial wildlife habitat impacts of the Jackson Hydroelectric Project. Once again, we appreciate the effort that has been dedicated to this end. We also wish to say we appreciate the cooperative spirit that prevailed during the course of its development.

Per our review and as a follow-up to our meeting of January 14, we have the following additional comments.

As noted at the meeting, the economic analysis is incomplete and was not in the draft plan. Related to this analysis will be final decisions regarding whether certain of the lands included in this plan will be acquired via long-term lease or fee title. We wish to emphasize that it will be essential to assure that mitigation lands will be available for all purposes of the plan and, that to the greatest extent possible, be free of potential for conflicting actions or uses being superimposed at some later date. In this regard, it seems that fee title acquisition would most likely meet this objective and we therefore recommend this method. If uses occur that conflict with the plan and impair its effectiveness to mitigate project impacts, additional or replacement habitats may be necessary.

Long-term effectiveness and success will depend heavily on how well implementation is kept on track. The monitoring plan will be very important in this respect. There needs, however, to be mechanisms to assure that evaluations take a broad view that includes total progress toward overall goals as well as specific objectives.

Martin Hatscher
March 1, 1988
Page 2

Our discussion with Washington Department of Labor and Industries representative Herb Williams was most informative. It underscored the importance of foresight and consideration of future conditions as they may affect on-site or adjacent management and safety. Occupational safety of plan operation is of paramount importance. We would not, however, like to see plan effectiveness thwarted or diminished. In that event, compensatory measures may be necessary.

Regarding permits, the State Hydraulic Code (RCW 75.20.100, 75.20.103, 75.20.106, 75.20.130, and 75.20.140) is jointly administered by the Department of Fisheries and Department of Wildlife. In Western Washington, original applications are submitted to Fisheries. Applications are then sorted and allocated for final processing according to agency jurisdiction. In general, Wildlife investigates and issues all permits for waters above anadromous fish use and Fisheries handles those below. When the action involves a Forest Practice Application (FPA) no Hydraulic Permit application is required since the FPA serves as the application for both permits. When appropriate, an HPA is then also issued from the FPA.

Thank you for the opportunity to comment on this habitat management plan. We look forward to its implementation. When the final documents are completed, please provide us with two full sets along with two additional copies of the main report.

Very truly yours,

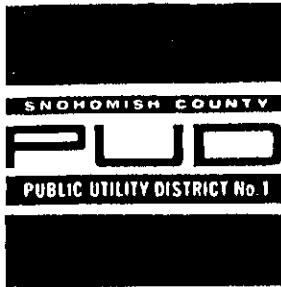
THE DEPARTMENT OF WILDLIFE

R. Gary Engman
Habitat Management Division

RGE:td

cc: City of Everett - Clair Olivers
USFWS - Ging
Tulalip Tribes - Somers
Division - Fenton
Region - Muller, Everitt

E-158



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

March 11, 1988
PUD-17752

Mr. Joe Potter
Washington Dept. of Natural Resources
919 North Township
Sedro Woolley, WA 98284

Dear Mr. Potter:

Jackson Project - FERC #2157
License Article 53 - Wildlife Habitat Management Plan
Response to Comments on January, 1988 Draft Plan

Thank you for your comments (dated February 10, 1988) on the January, 1988 draft of the Jackson Project Wildlife Habitat Management Plan (Plan). Appendix C, "Regulatory Requirements", has been revised based on your comments numbered 2 and 3. We appreciate your guidance on the Forest Practices Rules and Regulations.

Regarding your Item 1 about surface vegetation management on the permanent pipeline right-of-way for wildlife habitat, we believe that the proposed mitigation activity is consistent with the purpose of the easement agreement and compatible with your agency's interests. As in the past, we expect to be able to identify mutually acceptable strategies for right-of-way use and develop them in a non-interfering way while avoiding further reliance on paperwork.

Accordingly, we anticipate managing the permanent 90-foot-wide right-of-way as proposed in the Plan. This activity mitigates for the original land clearing and constructing of the power pipeline buried beneath the right-of-way and it is consistent with the District's authority and need to maintain reasonable ease of access for future maintenance and repair, if necessary. Therefore, right-of-way surface vegetation management is an integral component of pipeline operation and maintenance.

It is our opinion that your agency should, in accord with Agreement No. 44332, restrict its use of the right-of-way to activities which are compatible with the District's Project operation, including implementation of the Federally required Plan. We welcome further comment and suggestions from

Mr. Joe Potter
WA Dept. of Natural Resources

-2-

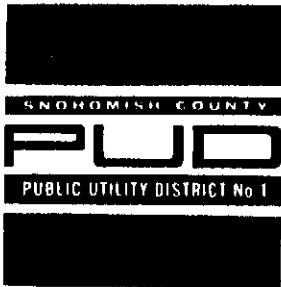
March 11, 1988
PUD-17752

you regarding implementation of the Plan on the right-of-way. Our goal is to accomplish the objectives of the Plan in a manner acceptable to both the District and ONR through coordination of our activities with yours.

Very truly yours,
ORIGINAL SIGNED BY
M. HATSCHER
Martin Hatscher
Acting Director, Power Management

KLB/RGM:jk
cc: D. Farwell, ONR
bcc: K. Bedrossian
R. Metzgar
G. Mixdorf/D. Hale
N. Johnson
D. Hanson
CNE Reading File

E-159



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

March 15, 1988
PUD-17765

Mr. Herb Williams
State of Washington
Department of Labor & Industries
Division of Industrial Safety & Health
Evergreen Way Business Ctr.
8625 Evergreen Way, #250
P. O. Box 67
Everett, WA 98206

Dear Mr. Williams:

Jackson Project - FERC #2157
Wildlife Habitat Management Plan

Thank you for your participation at our January 14, 1988 consultation meeting and for your written comments (dated February 26, 1988) regarding the final draft of the Wildlife Habitat Management Plan (January 1988). It is District policy to give safety of employees highest priority in all activities. Implementation of the Plan will be no exception to this policy. We believe that similar policy prevails with the City of Everett. We anticipate working with your organization throughout the implementation process to assure that your safety requirements are met.

We have incorporated your comments into the final Plan as follows:

- Section 2.3 Snag Management was altered in response to your comment #2.
- Section 2.3 also was altered in response to your insert suggested for Section 4, Page 4-1. Section 2.3 addresses all snag management, not just monitoring.
- Appendix C was changed in response to your final comment.

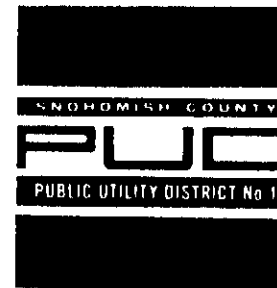
We look forward to working with you during Plan implementation.

Very truly yours,
Original Signed By:
M. Hatscher
Martin Hatscher
Acting Director, Power Management

cc: G. Ging, USFWS
G. Engman, NDW
D. Somers, Tulalip Tribes

P. Green, USFS
B. Jones, City of Everett
C. Olivers, "

0767T



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

March 15, 1988
PUD-17764

Mr. Gary Engman
Washington State Dept. of Game
Region 4
16018 Mill Creek Blvd.
Mill Creek, WA 98012

Dear Mr. Engman:

Jackson Project - FERC #2157
Wildlife Habitat Management Plan

Thank you for your comments (dated March 1, 1988) regarding the final draft of the Wildlife Habitat Management Plan (January 1988). We have enclosed a copy of Chapter 7, "Economic Analysis", and Appendix D, "Landowner Agreements", to apprise you of our continuing efforts toward Plan completion. The enclosures address the concerns about the Plan expressed in your comments.

Based on discussion with the Washington Department of Natural Resources (DNR), we anticipate that control of the Williamson Creek Tract will be obtained through fee title acquisition consistent with your preference for assuring Plan effectiveness. Before obtaining ownership of the property, we would prefer to have FERC review and approval of the Plan. Otherwise, our control action could be premature. Nevertheless, we are proceeding with essential steps to gain control of the property for Plan purposes. Assuming avoidance of an extended FERC review process with the Plan, we will be prepared to implement the Plan in accord with the proposed schedule. In addition, we are analyzing our agreement with DNR on the power pipeline right-of-way to confirm management consistency with the objectives of the Plan for Project facility lands.

We have altered Appendix C in response to your comments regarding the State Hydraulic Code. Thank you for the clarification.

We sincerely appreciate your efforts, time and cooperation during Plan development.

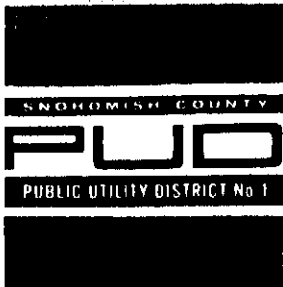
Very truly yours,
Original Signed By:
M. Hatscher
Martin Hatscher
Acting Director, Power Management

Attachments (2)

cc: G. Ging, USFWS
D. Somers, Tulalip Tribes
P. Green, USFS
J. Potter, DNR

Bell & Ingram
B. Jones, City of Everett
C. Olivers, "

E-160



2320 California St., Everett, Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206
March 15, 1988
PUD-17763

Mr. Jay F. Watson
U. S. Fish & Wildlife Service
2625 Parkmont Lane S. W.
Olympia, WA 98502

Dear Mr. Watson:

Jackson Project - FERC #2157
Wildlife Habitat Management Plan

Thank you for your comments (dated February 12, 1988) regarding the final draft of the Wildlife Habitat Management Plan (January 1988). We have enclosed a copy of Chapter 7, "Economic Analysis", and Appendix D, "Landowner Agreements", to apprise you of our continuing efforts toward Plan completion. The enclosures address the concerns about the Plan expressed in your comments.

E-161
Based on discussion with the Washington Department of Natural Resources (DNR), we anticipate that control of the Williamson Creek Tract will be obtained through fee title acquisition consistent with your preference for assuring Plan effectiveness. Before obtaining ownership of the property, we would prefer to have FERC review and approval of the Plan. Otherwise, our control action could be premature. Nevertheless, we are proceeding with essential steps to gain control of the property for Plan purposes. Assuming avoidance of an extended FERC review process with the Plan, we will be prepared to implement the Plan in accord with the proposed schedule. In addition, we are analyzing our agreement with DNR on the power pipeline right-of-way to confirm management consistency with the objectives of the Plan for Project facility lands.

We sincerely appreciate the assistance from the U. S. Fish and Wildlife Service, particularly by Gwill Ging, for his efforts, cooperation and perserverance with Plan development.

Very truly yours,

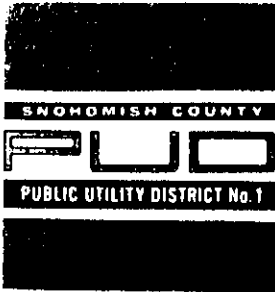
Original Signed By
M. Hatscher

Martin Hatscher
Acting Director, Power Management

Attachments (2)

cc: G. Ging, USFWS
G. Engman, MDW
D. Somers, Tulalip Tribes
P. Green, USFS
J. Potter, DNR
Bell & Ingram
B. Jones, City of Everett

C. Olivers, City of Everett



2320 California St. Everett Washington 98201 258-8211
Mailing Address: P. O. Box 1107, Everett, Washington 98206

April 29, 1988
PUD-17766

Mr. Stanley G. Jones, Jr.
Chairman
The Tulalip Tribes
6700 Totem Beach Road
Marysville, WA 98270

Dear Mr. Jones:

Jackson Project
Wildlife Habitat Management Plan
Response to Tulalip Tribes' Comments on Plan

Thank you for your review comments on the final draft of the proposed Wildlife Habitat Management Plan (Plan). A paragraph-by-paragraph response has been prepared and a copy is attached. The following discussion should also be helpful in understanding the response.

Access to and Permanent Security of Mitigation Lands

The Licensees now own or intend to own eventually all proposed mitigation lands with two exceptions. First, the 40-acre power pipeline right-of-way from the Blue Mountain tunnel portal to the powerhouse is owned by the State of Washington and two private owners. The District has a permanent easement for a 90-foot right-of-way above the buried pipeline for Project operation and maintenance. Second, one acre of land under the 115 kv transmission line east of the powerhouse is also owned by the State, subject to the District's permanent easement. Thus, all but 41 acres of land for wildlife mitigation would be owned by the Licensees.

Except for those areas where public access and use may be restricted for safety or protection of facilities and water quality, mitigation lands will be open to Tribal and other public access for hunting, fishing, recreation and other purposes. The Tribes will have access to these lands for fishing as provided by treaty, and for gathering roots and berries. Maintenance of mitigation lands will extend for the life of the Project.

The Licensees are currently engaged in a proposed land exchange with the U. S. Forest Service whereby national forest lands within Project boundaries, and other national forest lands to be utilized for Project operation and mitigation purposes, would be transferred to Licensee

Mr. Stanley G. Jones, Jr.
The Tulalip Tribes

--2--

April 29, 1988
PUD-17766

ownership. This property would be maintained by the Licensees in accordance with the proposed Plan and other regulatory obligations. In exchange, Licensees would purchase real property of equal value, and transfer ownership of such property to the United States for inclusion into the national forest system. As a result, lands of equal value formerly in private ownership would become part of the national forest system with the status of "open and unclaimed" lands within the meaning of the treaty language. The actual net result from the proposed exchange and the setting aside of lands for Project mitigation will be an increase in the number of acres which are preserved for hunting and other Tribal or public recreational use over what may have existed in the absence of the Project.

The national forest property currently occupied by the Jackson Project is subject to uses incompatible with the Tribal hunting privilege and is no longer "open and unclaimed" land as described by Treaty. Licensees believe they do not have authority to agree to such terms, nor do they believe such terms are reasonably required for mitigation in light of the proposed land exchange.

Add More Old-Growth Forest at Lake Chaplain

Based on evaluation of the proposed Plan, significant mitigation (204%) will be provided for old-growth forest. Providing more with the same land base will reduce mitigation for other habitat types and dependent wildlife production. The Licensees and U. S. Forest Service are examining the feasibility of a land exchange as discussed above. If national forest lands are acquired by the Licensees, these lands would be managed for wildlife in coordination with the Recreation Plan. Some remaining old-growth stands are included in the acreage under land exchange consideration.

Religious and Ceremonial Areas

The Licensees are willing to consider provision for access needs of Tribal members to mitigation lands for religious and ceremonial purposes. In so far as related Tribal activities are consistent with the matters already discussed and the proposed Plan, the Tribes could have access to mitigation properties for religious and ceremonial activities. The Plan could be amended to recognize these activities, assuming that such amendment doesn't require changes in management prescriptions, schedules and the effect on wildlife values, or conflict with applicable law.

We appreciate your identification of areas that appear deficient concerning your interests and rights under the Treaty of Point Elliott. We also appreciate your suggestions on ways to address the "deficiencies" in a

E-162

Mr. Stanley G. Jones, Jr.
The Tulalip Tribes

-3-

April 29, 1988
PUD-17766

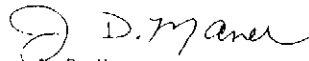
Technical Response to Comments from the Tulalip Tribes
on the Jackson Project Wildlife Habitat Management Plan

manner that will be satisfactory to the Tulalip Tribes. We believe that with most items, we are approaching mutual understanding and agreement. Items for further discussion include:

- provision for religious and ceremonial activities on mitigation lands;
- hunting, fishing and gathering on mitigation lands; and
- co-licensee/U. S. Forest Service land exchange.

We propose that a meeting be scheduled soon to discuss these items as well as obtain your reaction to this response. A District/City representative will be contacting you very shortly for that purpose.

Very truly yours,



J. D. Maner
Director, Engineering and Power Supply

Attachment

- cc: Francis Sheldon, Tulalip Tribes
D. Somers, Tulalip Tribes
Bell & Ingram
G. Ging, USFWS
G. Engman, WDW
P. Green, USFS
S. Nagel, USFS

E-163

1. Deer and Elk Populations

It is not evident that deer and elk were present in large numbers in the Sultan Basin immediately prior to construction of Stage I of the Jackson Project. According to the Fish and Wildlife Resource Study completed by Washington Department of Game (WDG) in 1982, elk were not found in the Sultan Basin Project area nor were they mentioned as having been impacted by either Stage I or II. Black-tailed deer population estimates are not available. However, for impact assessment, WDG used Habitat Evaluation Procedures (HEP). The quality rating (Habitat Suitability Indices) for deer habitat in the Sultan Basin ranged from 5.5 in mature coniferous forest to 7.8 in wetland on a scale from 1 to 10 (where 10 would represent optimum habitat). Losses were updated and are summarized in the HEP assessment (Chapter 6) of the Plan. This chapter also summarizes the extent to which Plan implementation would mitigate/compensate for wildlife losses. The mitigation effort covers all wildlife losses not only for the reservoir, but all other Project facilities as well.

2. Lack of Prior Mitigation for Wildlife

The Tribes are reminded of Article 53 in the Order Amending License and Providing for Hearing issued on October 16, 1981, by the Federal Energy Regulatory Commission (17 FERC ¶ 61,056). Wherein, "Licensee shall consult with the Washington Departments of Fisheries, Game, and Ecology, the Tulalip Tribes, (emphasis added). . . and, prior to initiation of Project construction, file for Commission approval a plan to mitigate effects of construction on aquatic and terrestrial resources . . .". The Licensees complied fully with that requirement. The Construction Mitigation Plan for Aquatic and Terrestrial Wildlife was developed and implemented by the Licensees prior to and during construction of Stage II of the Project. Mitigation included phased harvest of timber, leaving a strip of forest vegetation along the upper 10 feet of the reservoir, development of an Erosion Sedimentation and Slope Stability Control Plan and a revegetation program. Also, the Wildlife Habitat Management Plan mitigates for losses incurred from both stages of the Project.

3. Tribal Participation in Plan Development

Our records indicate that since January, 1986, the Tribes have participated in only one meeting regarding the revised Plan. During the past two years, numerous meetings were held on Plan development. On March 17, 1987, Dave Somers explained that the Tribes were negotiating with the State regarding hunting rights. He also said that the Tribes might have a problem with the U. S. Forest Service trading out of the Sultan Basin because of hunting rights issues. Unimpaired access and

open and unclaimed status of wildlife mitigation lands were not mentioned. The Tribes have had ample opportunity to present their interests in a more timely manner and see them reflected in the Plan

4. Guaranteed Tribal Access to Mitigation Lands

Mitigation lands are open to public access, except for a portion of the Lake Chaplain Tract immediately adjacent to the reservoir and the tributary drainage area (see Figure 1 attached), which are closed to protect water quality. Public safety and protection of facilities restrict public access to Project operation facilities such as the powerhouse, intake tower, access shaft, control building and microwave buildings. At least 3,660 acres of land and a natural lake are included in the Plan. Approximately 2,560 acres will be open to public access. Of these 2,560 acres, over 1,300 acres were previously closed to public access, including hunting. In addition, the 1,870-acre reservoir, Spada Lake, is open to the public.

5. Permanent "Security" of Mitigation Lands

Plan Appendix D, "Landowner Agreements", addresses the "permanent" security of mitigation lands. This part of the Plan was not ready for review with the rest of the Plan. The Lake Chaplain Tract and Lost Lake Tract are owned by the licensees. Project facility lands are owned by the District, except the right-of-ways for which the District has permanent easements from private landowners and the Washington Department of Natural Resources (DNR). The licensees have control over the Spada Lake Tract through the authority of the Federal Energy Regulatory Commission (FERC). The tract and Project boundary are coincident with the confines of the power withdrawal in the Mt. Baker-Snoqualmie National Forest established by the FERC for Project purposes under the Federal Power Act. Also, future licensee ownership of the Spada Lake Tract is currently under discussion as part of a potential land exchange with the U. S. Forest Service. Licensees' acquisition of the Williamson Creek Tract is currently being negotiated with the DNR. If for some reason proposed mitigation lands were not available, alternative mitigation would obviously have to be considered. However, the licensees' action on obtaining full control of all mitigation lands is somewhat premature, since review and approval action is still pending by the FERC.

6. "Open and Unclaimed Lands" Assurance

As explained above at #4, 2,560 acres of mitigation lands will be open to public access, plus the 1,870-acre reservoir. By definition, these lands could not be considered "open and unclaimed", since they will be dedicated to wildlife mitigation or other purposes for the Jackson Project. They will be controlled by the licensees as explained above in #5 and in the transmittal letter. Since only the reservoir area and related facilities occupy lands in the "open and unclaimed" status by location within the Mt. Baker-Snoqualmie National Forest, the total

mitigation land acreage, particularly opening 1,300 acres formerly closed to public access, provides reasonable mitigation concerning access.

7. Designation of Mitigation Lands as "Open and Unclaimed"

See #6 above. Also, the licensees believe that the intent and implementation of the proposed Wildlife Habitat Management Plan are consistent with Treaty language. The licensees decline to act as an agent for the Tribes with the State of Washington. The implied concepts and requirements of the Tribal request could logically be contained in a comprehensive agreement between Treaty Indians and the State about hunting and access to mitigation areas.

8. More Old-Growth Forest

Old-growth forest will be mitigated at least 204% under the Plan. Managing additional areas within the Lost Lake and Lake Chaplain Tracts for "return to old-growth condition" would reduce mitigation for other wildlife species such as the black-tailed deer, ruffed grouse, and black-capped chickadee. Related Plan development issues were discussed at the numerous consultation meetings which the Tribes did not attend. However, meeting summaries were sent to the Tribes and comments were encouraged. Since no comments were made by the Tribes, the Plan was prepared as presented for final review. However, additional old-growth forest stands in the Sultan Basin are encompassed in areas under review for a possible licensee land exchange with the U. S. Forest Service (see #5 above). At least 700 acres of the National Forest acreage to be acquired would be designated for wildlife mitigation purposes. Therefore, exchange acquired old-growth forest could be designated for protection and management under the Wildlife Habitat Management Plan, thus increasing the total old-growth acreage in that Plan.

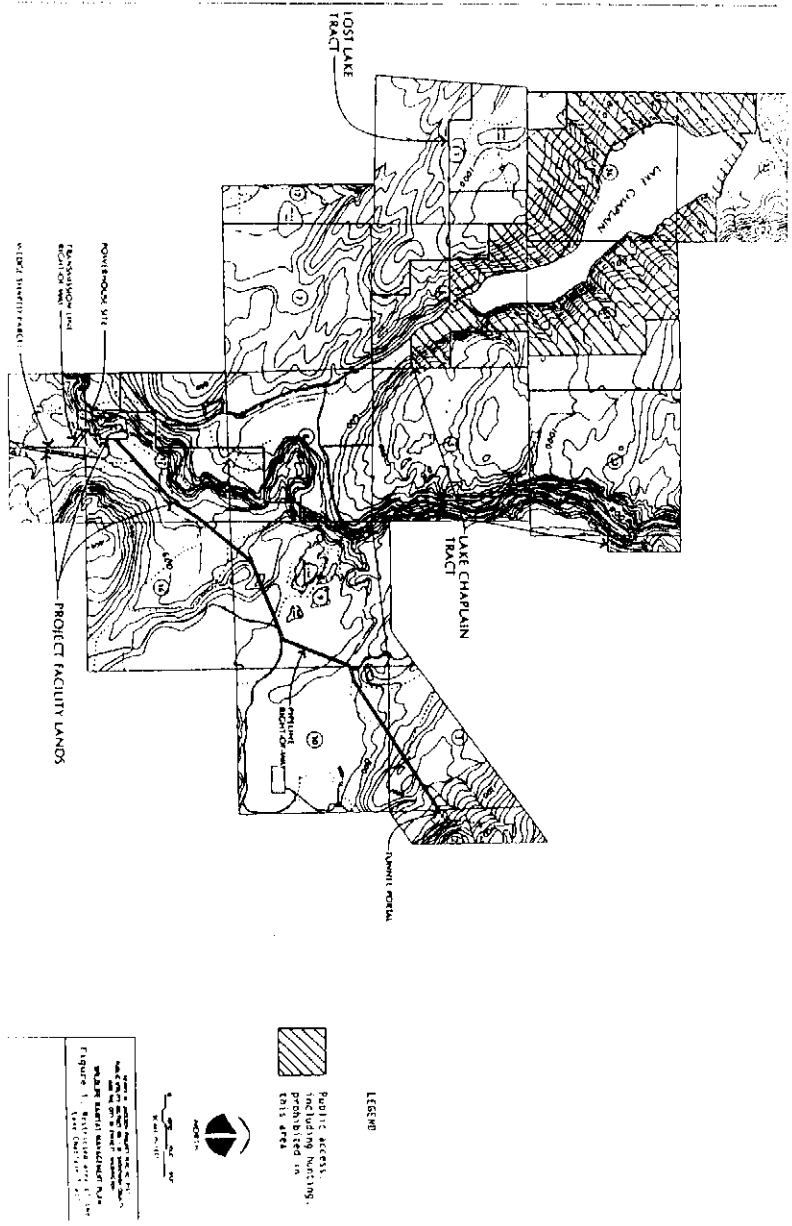
9. Provision for Religious and Ceremonial Areas in Mitigation Lands

The licensees are mindful of and have respect for traditional Tribal religious and ceremonial activities involving lands in the Sultan Basin. The licensees presume that Tribal exercise of these rights would be consistent and compatible with Plan objectives. However, could there be a conflict between open and unimpaired public access and Tribal religious and ceremonial activities? The licensees will pursue this matter further with the Tulalip Tribes to obtain clarification.

Attachment
4/29/88

###

E-164



THE TULALIP TRIBES

Board of Directors:
 Stanley G. Jones, Sr., Chairman
 Bernard W. Gobin, Vice Chairman
 Dawn E. Simpson, Secretary
 Stanley G. Jones, Jr., Treasurer
 Donald C. Haich, Jr., Member
 Debra L. Posey, Member
 Roy E. Haich, Member
 Clarence M. Haich, Executive Director

6700 TOTEM BEACH ROAD
 MARYSVILLE, WA 98270
 652-4585

The Tulalip Tribes are the successors
 in interest to the Snohomish,
 Snoqualmie and Skykomish tribes
 and other tribes and bands signatory to
 the Treaty of Point Elliott

February 12, 1988

Snohomish County Public Utility District #1
 2320 California Street
 P.O. Box 1107
 Everett, WA 98206

Attention: Mr. Martin Hatscher

RE: Tulalip Tribes Comments on Final Draft of Wildlife Habitat
 Management Plan

Dear Mr. Hatscher:

The Tulalip Tribes have reviewed the draft Wildlife Habitat Management Plan for the Henry H. Jackson Hydroelectric Project and would like to submit the following comments.

The Sultan River Basin, which was inundated after the construction of Culmback Dam in 1965, was historically an important hunting and gathering place for ancestors of the Tulalip Tribes. The Sultan Basin provided a prime summer hunting area for deer and elk which were evidently present in large numbers. Inundation of the valley in 1965 destroyed approximately 750 acres of this hunting area and further severely reduced the general availability of lowland valley habitat in the area. Further losses to wildlife habitat and hunting area occurred in 1983 when Culmback Dam was raised by 62 feet. Total loss of area to the reservoir is estimated to be 1870 acres. Additional losses have occurred through the construction and maintenance of other project facilities.

The Tulalip Tribes have treaty secured hunting and fishing rights under the Treaty of Point Elliott, which states:

"The right of taking fish at Usual and Accustomed grounds and stations if further secured to said Indians in common with all citizens of the Territory, and of erecting temporary houses for the purpose of curing, together with the privilege of making and gathering roots and berries on open and enclosed lands."

No compensation for wildlife and hunting losses has occurred until this time.

As tribal representatives have indicated to you verbally in past meetings on this issue, prime concerns of the Tulalip Tribes are to secure unimpaired access to hunting areas, to mitigate for past losses of habitat and hunting area, and to ensure no further loss of either hunting areas or wildlife habitat.

The draft plan is deficient in meeting these goals in several respects:

1. The plan does not guarantee access to "mitigation" lands by the Tribes for purposes of hunting, fishing, or other Treaty protected activities.
2. The plan does not adequately address the permanent security of "mitigation" lands. Specifically, provisions for the permanent acquisition of mitigation tracts must be included in the plan.
3. The areas inundated in 1965, and the additional areas inundated in 1983, were "open and unclaimed lands" and thus were subject to the Tribes' rights under the Treaty to hunt and gather roots and berries on these lands. The draft plan does not contain provisions to adequately assure that the "mitigation" lands will also be "open and unclaimed" within the meaning of the treaty language, or provisions to assure that it remains so in perpetuity. The Tulalip Tribes believe that the mitigation plan, and the implementing FERC order, should contain specific language to assure that the mitigation land will be, and will remain in perpetuity, public lands which are "open and unclaimed" within the meaning of the Treaty, and also contain provisions to make this determining binding upon the State of Washington as well as the PUD. The Tulalip Tribes believe it would be appropriate for the PUD to provide such assurances itself, and agree to an implementing order so indicating, and to obtain such assurances and agreement to an implementing order so indicating from the State.

Assuming you are successful in obtaining the State of Washington's concurrence, the following language in the plan and implementing order might be useful:

"All areas set aside for mitigation under this mitigation plan shall be deemed, and are, "open and unclaimed land" as that phrase was used in the Treaty of Port Williett, 12 Stat. 927. The Tulalip Tribes of Washington, as signatories in interest to the tribal signatories to that Treaty, are

entitled to exercise fishing, hunting and gathering rights guaranteed by that Treaty within these mitigation areas in perpetuity. This determination shall be binding upon the licensees and upon the State of Washington, which has intervened in these proceedings through various state agencies."

The Tribe also believes that similar language should be contained in an agreement to be signed by the PUD, the State (through appropriate officials), and the Tribe so as to assure it is binding upon that State.

4. We believe there should be additional areas within the Lost Lake Chaplain tracts which are managed for return to "old growth" condition -- i.e., left essentially unmanaged and unharvested.
5. The inundated areas were also important traditional religious and ceremonial areas for the Tulalip Tribes of Washington. The plan should contain provisions to assure tribal access to the "mitigation lands" for traditional religious and ceremonial purposes.

We believe, however, that with adequate correction of these deficiencies, the proposed mitigation plan can become acceptable. We therefore, suggest you include provisions for permanently securing unimpaired access to mitigation tracts by tribal members for the purposes of hunting and gathering, and including additional unmanaged areas with the Lost Lake and Lake Chaplain tracts.

Sincerely,
THE TULALIP TRIBES

Stanley C. Jones Sr.
Stanley C. Jones, Sr.
Chairman

Francis Sheldon
Francis Sheldon
Deputy Director, Fisheries

SGJ/ih

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**CONSULTATION MEETINGS
1986-88**

<u>MEETING DATE</u>	<u>ATTENDEES</u>		<u>PURPOSE</u>
	<u>Name</u>	<u>Organization</u>	
01/29/86	G. Engman G.. Ging K. Bedrossian R. Metzgar	WDG USFWS District District	Present outlines of plan development process and proposed scope of work; discuss certain technical issues related to Habitat Evaluation Procedures (HEP); and discuss reservoir (riparian) shoreline management plan.
07/15/86	G. Engman G. Ging J. Bartelme M. Kearney M. Vaughn G. Graves R. Metzgar K. Bedrossian	WDG USFWS USFS USFS Beak Consultants City of Everett District District	Inform agencies of current status of mitigation plan development and obtain agency concurrence on the prototype mitigation plan, the outline and the impact HEP and performing the mitigation HEP, cover types, evaluation species and target years.
09/03/86 (Meeting) 09/10/86 (Tele. Conf.)	G. Engman G. Ging M. Vaughn K. Bedrossian	WDG USFWS Beak Consultants District	Discuss the update of the 1982 HEP for the lands impacted by the Project and obtain agency concurrence on key assumptions, including the study area, Habitat Suitability Indices (HSI) values and logging rates that would have occurred if the Project had not been built ("without Project assumptions").
03/06/87	G. Engman G. Ging R. Williams M. Kearney M. Vaughn D. Hays K. Bedrossian	WDG USFWS USFS USFS Beak Consultants Beak Consultants District	Assist the resource agencies with their review of the Draft Wildlife Habitat Management Plan (Plan) and the HEP analyses.

<u>MEETING DATE</u>	<u>ATTENDEES</u>		<u>PURPOSE</u>
	<u>Name</u>	<u>Organization</u>	
03/17/87	G. Engman D. Somers M. Kearney M. Vaughn D. Hays R. Metzgar K. Bedrossian	WDG Tulalip Tribes USFS Beak Consultants Beak Consultants District District	Assist the resource agencies with their review of the Draft Plan and the HEP analyses, and discuss agency concerns.
06/26/87 and 06/29/87	G. Engman G. Ging L. Weldon G. Graves R. Metzgar K. Bedrossian M. Vaughn D. Hays	WDG USFWS USFS City of Everett District District Beak Consultants Beak Consultants	Discuss resource agency comments on Draft Plan and co-licensees' responses with the goal of resolving most issues and identifying process to resolve others.
07/22/87	G. Engman G. Ging L. Weldon G. Graves R. Metzgar K. Bedrossian D. Hays M. Vaughn	WDG USFWS USFS City of Everett District District Beak Consultants Beak Consultants	Present and discuss a wildlife mitigation package (Plan 2) prepared in response to agency correspondence and consultations, and resolve issues in an effort to advance the planning process toward a final plan.
08/06/87	G. Engman G. Ging C. Olivers G. Graves D. Lowell C. Grimes K. Bedrossian D. Hays M. Vaughn	WDW USFWS City of Everett City of Everett City of Everett District District Beak Consultants Beak Consultants	Resolve hunting/public access issue at Lake Chaplain, and reach agreement on the contents of the Plan.
09/03/87	G. Engman G. Ging D. Lowell G. Graves C. Grimes R. Metzgar K. Bedrossian D. Hays M. Vaughn	WDW USFWS City of Everett City of Everett District District District Beak Consultants Beak Consultants	Reach agreement on the Draft Plan and discuss the monitoring program.

MEETING DATEATTENDEESPURPOSE

01/14/88

<u>Name</u>	<u>Organization</u>
G. Engman	WDW
G. Ging	USFWS
H. Williams	WDLI
G. Graves	City of Everett
R. Metzgar	District
K. Bedrossian	District
D. Hays	Beak Consultants
M. Vaughn	Beak Consultants

Familiarize agency representatives with the Final Draft Plan and assist their review of the Plan. Discuss labor safety in forest work.

