

MEMORANDUM FOR RECORD

SUBJECT: Skagit Flood Control Reconnaissance Study - Response to Questions Raised by Skagit County on Study Plan Tasks

1. *Question 1 - The Cultural Resources Survey is \$67,000. Why does this cost so much? Please detail scope.*

A cultural resources study was previously accomplished for the 1979 EIS for the proposed Flood Control Project. Since that time many changes have occurred along the levee alignment. A new reconnaissance of the proposed levee alignment (from Sedro Wooley to the mouth) is required to pick up areas which have not been previously surveyed, as well as reviewing in greater detail areas surveyed in the late 70's and incorporating new information from other surveys done since 1979. This item will be rescoped.

2. *Question 2 - Scoping Document. Please provide an example.*

A scoping document presents the results of study scoping with the public. Activities involved in preparing the scoping document include putting together documents to solicit public comment, conducting a public meeting to solicit input, and summarizing results of scoping. An example of a scoping document (high end) is included for your information

3. *Question 3 - Snohomish County has implemented overtopping levees. What environmental studies have been done and/or were required? Can this information be utilized?*

We are currently contacting Snohomish County and will incorporate relevant information from their studies into our studies. Some effort must be made to assess what happens to fish which are "captured" by the overtopping process, and how to return as many fish as possible to the river. Snohomish County did mention that the problem of fish being swept over the overtopping levees was not an issue in their analysis. This issue will be revisited in this study. Part of the the rescoping will depend upon information on the behavior of fish in flood situations and whether the fish during flood events aggregate in the upper 18 inches of the water column. If this is the case, then overtopping levees would present fisheries problems that would have to be examined in greater detail..

4. *Question 4 Fish Studies. If this is looking into the "historic" riverine degradation due to Army Corps dredging, why is the local sponsor involved in financing this portion of the study?*

Unless the proposed study is linked with the ecosystem restoration study, the fisheries studies will focus on present conditions and projected impacts from the proposed project. With the possible elimination of the cutoff levee on the Nookachamps, the cost of the fish studies could decline due to the elimination of the Nookachamps refugia analysis. The fish studies have to be rescoped to account for the revised project proposal and new information.

5. *Question 5 - Mitigation Plan. Study scope should analyze future project impacts only.*

Agreed. This item had been scoped to assess mitigation features for the proposed project.

6. *Question 6 - Literature review (general). This needs to be the first task completed, and a report should be generated to illustrate scoping changes as a result of findings. Existing studies should be utilized as much as possible.*

This item will be one of the first accomplished. We intend to utilize existing studies as much as possible, in particular studies already accomplished by the Skagit System Cooperative related to fish use. We will reevaluate the scope of the fish studies based on new studies accomplished since 1994. Because of the short time frame for completion of the project and the season nature of fish studies, we will need to get any agreed upon fish studies underway in a timely manner.

7. *Question 7 - Riparian studies. Please define need and study area locations.*

Riparian areas represent significant migration corridors, as well as contributors to overall fish habitat. On the lower Skagit, where a large amount of historic forest land has already been removed, the riparian areas become even more important as habitat. As previously proposed, the levee system would eliminate significant riparian acreage. The impacts of this reduction must be evaluated. The entire river riparian zone will be evaluated. Significant areas of riparian vegetation exist along the river downstream of Mt. Vernon as well as above Burlington.

8. *Question 8 - Planning aid letter. Need an explanation. What is it?*

Planning aid letters (PALs) are interim reports supplied by the Fish and Wildlife Service to provide timely feedback to the Corps and local sponsor on fish and wildlife impacts of the various project alternatives. The initial PAL is intended to provide early planning input on key areas of concern, recommended studies the USFWS believe need to be accomplished to answer resource impact questions as they relate to project feasibility, and the cost and design of those studies for use in project scoping. Given the expedited study process, the need for two PALs will be reevaluated..

9. *Question 9 - U.S. Fish and Wildlife. How is this report utilized?*

There appears to be some duplication between this report and the FWCA report. Part of the confusion is because there are two units of FWS that are being dealt with, the Fisheries Research Office (FRO), and the Ecological Services Office. FRO or their agent (most likely the Skagit System Cooperative) would conduct the fish studies. The Ecological Services Office is responsible for assessing potential project impacts as part of their responsibilities under the Fish and Wildlife Coordination Act (FWCA). This item will be rescoped to reflect only a summation of work done by the FRO.

10. *Question 10 - FWCA report. What is it? Please provide an example.*

The FWCA report is a document prepared by the FWS that assesses potential project impacts. This document is required as part of the Fish and Wildlife Coordination Act which

mandates that the FWS will prepare an independent evaluation of the fish and wildlife impacts of water resources projects, to be submitted with the feasibility report for consideration by Congress in their decision making concerning the project authorization. The FWCA report is typically included as an appendix to the EIS.

11. Question 24 - Public agency review document. \$16,335 is allocated to the U.S. Fish and Wildlife for this task. Please explain.

It appears that the allocation to the Fish and Wildlife Service is in error. This item refers to time responding to public review comments on the draft EIS and should be allocated to ERS. We will rescope this item.

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