

Chris Moore, SEATTLE, WA.

RE: Environmental Assessment for Project No. 2705-037: Washington Newhalem Creek Hydroelectric Project, Seattle City Light

Dear FERC,

On behalf of the Washington Trust for Historic Preservation, I am writing regarding Seattle City Light's application to surrender its license for the Newhalem Creek Hydroelectric Project: Project No. 2705-037. Originally constructed in 1921, the Newhalem Creek Hydroelectric Project is significant for its association with the growth and development of the Newhalem townsite and for its representation of hydroelectric development efforts in the Upper Skagit River Valley. This early project also served as a pre-cursor to the ensuing large scale hydroelectric projects that now comprise the Skagit River Hydroelectric Project, as power generated from the initial Newhalem Creek project was utilized to build the Gorge Dam and Powerhouse.

The Newhalem Creek Project has been effectively dormant since 2010, when it was shut down for power generation due to equipment maintenance needs. Functionally obsolete, Seattle City Light is seeking to decommission the project before the license expires in 2027. Yet the entire project complex "including the diversion dam, power tunnel, penstock, and powerhouse" are listed in the National Register of Historic Places as contributing elements of the Skagit River and Newhalem Creek Hydroelectric Projects Historic District. The Environmental Assessment conducted for the Application for Surrender of License by Seattle City Light includes partial removal as the Proposed Action. This alternative would see the diversion dam removed and the power tunnel sealed but would retain the penstock and powerhouse.

While it will be disappointing to lose elements of the Newhalem Creek Hydroelectric Project listed in the National Register of Historic Places, when considered overall the trade-off with restoration of habitat and natural stream processes must be taken into consideration. Original construction of the dam resulted in specific adverse impacts to the natural landscape and to an area eligible for listing in the National Register as a Traditional Cultural Property District. Removal of the dam can hopefully serve to mitigate the adverse impacts resulting from original construction. But given the historic significance of the Newhalem project overall, we believe it is important to retain the penstock and the powerhouse. We believe both elements of the project retain enough integrity to adequately convey their significance of early hydroelectric power development, and they can do so within the context of the larger Skagit River and Newhalem Creek Historic District.

The EA notes that a Cultural Resources Mitigation and Management Plan (CRMMP) will be developed based on several factors. Our hope is this plan will include documentation of historic features slated for removal. Perhaps more importantly, we encourage enhancement of interpretive opportunities for those National Register-listed elements that remain on site, specifically the powerhouse and penstock. The physical presence of the powerhouse and penstock are critical for present interpretation efforts, which can be bolstered with new documentation/information about the Newhalem Creek Hydroelectric Project and its connection to the overall Skagit Hydroelectric Project. But interpretation of these elements alone does not go far enough. We recognize the presence of several Tribal Communities since Time Immemorial within the Upper Skagit River Valley, along with the adverse impacts and cultural erasure resulting from the Newhalem Creek Hydroelectric Project and the much larger Skagit Hydroelectric Project that followed. Interpretation efforts for the Newhalem Creek Hydroelectric Project should include content covering the impact the project has had on Tribes since its inception.

While we generally concur with the Staff-Recommended Measures identified with the Proposed Action of Partial Removal, we do want to make one distinction with the recommendation to follow guidance outlined in the publication Preservation Brief 31: Mothballing Historic Structures. Seattle City Light has indicated its commitment to maintain the powerhouse and the interpretive elements in perpetuity. While some components of Preservation Brief 31 may be relevant for the powerhouse, based on Seattle City Light's commitment, the scenario does not seem to be a full-scale mothballing of the powerhouse. In short, whatever measures are taken as part of the de-commissioning, they should be restrained enough to enable meaningful interpretation to take place at the resource.

Despite the loss of historic resources identified in the EA associated with the Proposed Action, it offers a reasonable and achievable balance when considering the lifetime of the project. Natural, cultural and historic resources are important elements of the environment, and we believe a fair balance is being struck in this instance. Thank you for the opportunity to comment.

Sincerely,

Chris Moore
Executive Director
Washington Trust for Historic Preservation

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