



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

June 5, 2024

Debbie-Anne Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

In future correspondence please refer to:
Project Tracking Code: 2021-08-05085
Property: Newhalem Creek Hydroelectric Project Decommissioning
Re: Environmental Assessment (EA) Comment (P-2705-037)

Debbie-Anne Reese:

Thank you for the opportunity to comment on the above-referenced project as part of the NEPA process. While we understand that our office will be consulted as part of the Section 106 process, we wanted to take the opportunity to comment on the undertaking early on. Our review is based on the Environmental Assessment (EA) of the proposed decommissioning of the Newhalem Creek Hydroelectric Project (FERC No. 2705-037).

DAHP **disagrees and does not support** the actions proposed within the EA. After meeting and listening to the perspectives from both the Upper Skagit Indian Tribe (USIT) and National Park Service (NPS) it is DAHP's opinion that a modified full removal alternative, as described in NPS's letter to the Federal Energy Regulatory Commission (FERC) dated March 29, 2024, would be the preferred action and should be strongly considered by Seattle City Light (SCL) and the FERC.

The decommissioning project at Newhalem Creek requires a heavier focus on minimizing the effects of the Traditional Cultural Property District 45WH450 at the expense of adverse effects on the built environment. The Skagit River and Newhalem Creek Hydroelectric Project Historic District has numerous contributing resources, which are currently being expanded with a National Register Amendment. The loss of these two resources, while an adverse effect, would not heavily impact the integrity of the remainder of the district. DAHP sees the full removal option as a necessary solution to minimize the harmful past effects on the TCP when the powerhouse and penstock were built.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Maddie Levesque, M.A
Architectural Historian



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