







**Seattle City Light**

700 5th Ave. | P.O. Box 34023 | Seattle WA 98124-4023  
TEL (206) 684-3000 TTY/TDD (206) 684-3225 FAX (206) 625-3709  
seattle.gov/city-light    

August 6, 2025

DEBBIE-ANNE A. REESE, SECRETARY  
FEDERAL ENERGY REGULATORY COMMISSION  
888 FIRST STREET NE  
WASHINGTON, D.C. 20426

Re: Request for initiation of formal consultation under ESA section 7, Newhalem Creek Hydroelectric Project (Project No. 2705-037)

Dear Secretary Reese,

Seattle City Light (City Light) filed an Application for Surrender of License for the Newhalem Creek Hydroelectric Project (Project) with the Federal Energy Regulatory Commission (Commission, or FERC) on January 8, 2022. The draft Biological Assessment (BA) was included as Appendix A to the Application for Surrender of License.

As detailed below, based on recent informal consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service (Services), City Light requests that the Commission initiate formal consultation under section 7(a)(2) of the Endangered Species Act (ESA) with the Services based on the attached updated April 2025 BA.

On April 16, 2025, City Light provided the Services with a revised BA that had been updated from the previous BA to reflect new "best available science" that, paired with the findings of City Light's 2023 geomorphology report (*Newhalem Dam Decommissioning Geomorphology Considerations*, Dube 2023), indicates turbidity downstream of the dam will be similar to levels experienced during typical flood events under baseline conditions. Based on this information, City Light revised the recommended effects determinations to "not likely to adversely affect" for all listed fish species, and requested informal consultation and concurrence from the Services.

As the non-federal representative for purposes of informal consultation under ESA Section 7 (designated by FERC July 8, 2021), City Light engaged in discussions with the Services following the delivery of the revised BA on April 16, 2025. Following those conversations and the Services review of the revised BA, the Services determined the project will require formal consultation, to be achieved through the development of condensed biological opinions (see enclosed emails dated July 8, 2025 and July 10, 2025). Thus, City Light is requesting that the Commission, as the federal lead agency, initiate formal consultation with the Services using the attached April 2025 BA. The Services have reviewed this BA and are prepared to develop condensed opinions upon the request to initiate formal consultation. City Light requests the Commission initiate this request with the Services as soon as possible to allow ESA consultation to be completed in the summer of 2025. This timing would accommodate contracting

requirements to allow project decommissioning to commence in the summer of 2026. Considering the on-going landslide concerns along the dam access road, permitting timelines are critical.

If you have any questions, please feel free to contact me at (206) 684-3117. City Light looks forward to continued engagement with FERC and other parties to surrender the license and decommission the Project facilities.

Sincerely,

A handwritten signature in black ink that reads "Shelly Adams". The script is cursive and fluid.

Shelly Adams  
Decommissioning Project Manager  
Seattle City Light

cc. Diana Shannon, FERC  
Cody Payne, NMFS  
Jeff Garnett, USFWS  
Becky Holloway, HDR Engineering

Attachments: April 2025 *Biological Assessment and Essential Fish Habitat Assessment, Newhalem Creek Hydroelectric Project*  
April 16, 2025 transmittal to NMFS and USFWS  
July 8, 2025 NMFS formal consultation determination  
July 10, 2025 USFWS support for NMFS determination