



*Western  
Washington  
Agricultural  
Association*

August 15, 2018

To: David Trout, Chairman  
Salmon Recovery Funding Board  
Washington State Recreation and Conservation Office  
P.O. Box 40917  
Olympia, WA 98504-0917

Re: Skagit Watershed Council (Washington State Lead Entity) 2018 Salmon Recovery Funding Board-  
Skagit River System Cooperative's Smokehouse Tidal Marsh Restoration Proposal

Chairman Trout,

For each of the past three years, Western Washington Agricultural Association (WWAA) participated in the Skagit Watershed Council Lead Entity Citizens Committee (LECC). Serving in this role, WWAA reviewed Skagit River Systems Cooperative (SRSC) funding applications for the Smokehouse Dike Setback Project (Project) in both 2016 and 2018. This year, WWAA staff was unable to participate fully in LECC meetings and provide feedback by associated deadlines. Nonetheless, WWAA participated in the local process as able, and presents the following comments and questions relative to this Project for further consideration. As the only agricultural member of the SWC, WWAA attempts to balance the SWC's mission and salmon recovery efforts, by providing perspective otherwise not considered and acknowledged in project review and approval processes.

Located on the Swinomish Indian Tribal Community (Tribe) reservation, the land included within the proposed Project footprint design is actively farmed and located adjacent to other farmed ground. While WWAA supports the Tribe's choice to manage reservation land as they deem necessary to support their cultural and economic viability, WWAA questions the need for the setback dike primarily because the Tribe's land use policies and long term planning documents indicate no intent to sustain farming in this portion of the reservation. The inconsistency with those documents and the Project proposal results in confusion as to the short- and long-term objectives for the low-lying agricultural lands that include the Project footprint and areas protected by the proposed setback dike.

Seemingly, investments of the scale and magnitude SRSC requests, should provide clear and upfront information to funders and community as to the long-term plan for the land being protected by the proposed dike infrastructure. This is particularly important when an applicant is requesting large

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investments in dike infrastructure to facilitate implementation of a habitat project when there is no long-term plan to provide protection. Without intent to preserve or maintain agricultural production on adjacent land, benefits of repositioned infrastructure can be undone within years of implementation.

In addition, salmon recovery investments should be viewed with an eye towards long-term project resiliency and benefit. There have already been large investments of salmon recovery funding made at this site with uncertain or limited benefit to Chinook recovery and continual reductions in agricultural production. The Tribe and SRSC have done little to answer critical questions about the use of those funds as they pertain to the values of agricultural landowners/lessees of the site and the larger community. There is an overall lack of transparency and accountability associated with previous investments at this site and uncertainty about the need for additional investments at this time give the long-term plan for the area, as well as uncertainty associated with the McGlinn Causeway fish passage barrier and the North Fork Skagit River avulsion.

WWAA understands that the Tribe and SRSC struggle to acknowledge dike, drainage, and irrigation district authorities and operations. One of WWAA concerns relative to this position is the ongoing refusal to appreciate special purpose district commissioner expertise and knowledge of drainage and flood protection infrastructure. Many of these public officials have decades of experience and generational knowledge of how infrastructure works in this watershed, how management practices and processes have changed over time, and how to incorporate or alter infrastructure as part of restoration projects. Unfortunately, it is this long held and reoccurring position that the Tribe and SRSC conscientiously and strategically operate under, that has resulted in significant and lasting harm to agricultural and public landowners on this landscape.

On the only previous dike setback project managed by SRSC, district commissioners attempted to provide recommendations and consultation, along with potential ramifications of the selected design. However, this input and dialogue was disregarded and discounted by SRSC, and not incorporated in project plans. Predictably, the project has resulted in a legacy of failed infrastructure, lingering damage, continued investments, and damaged relationships. Further, during subsequent projects that did include district commissioner input, SRSC and Tribe chose not to participate, thus missing an opportunity to develop on the ground experience and understanding, as well as technical knowledge and comprehension of sub-tidal dike, drainage, and irrigation infrastructure and management.

Even as WDFW, NOAA, and others seize the opportunity to work with and learn from district commissioners, to ensure dike setback projects are thoughtfully and effectively designed, SRSC and Tribe fail to do so. In fact, SRSC and Tribe deliberately and purposefully apply for salmon recovery funding without incorporation or coordination with those that have successfully managed and completed large-scale dike setbacks and relocations. It seems appropriate that given the scope and cost of the proposed Project, incorporation and collaboration with entities and agencies which have successfully completed similar projects would be required, in order to receive additional funding.

WWAA remains actively engaged in salmon protection and recovery locally, and within multiple statewide processes, to balance natural resource policies and goals. SRSC goes to great lengths in the proposal to show how this Project, and previously funded work at this site, includes efforts to study how farmland uses can occur and be successful alongside recovery projects. However, SRSC does not include direct involvement of agricultural representatives or provide any authority for decision making in the



project process. As shown in programs and processes that collaborate and coordinate with agricultural organizations and producers, “agricultural community” participation could have provided SRSC the necessary understanding and perspective pertaining to infrastructure design and analysis relative to food and fiber production. SRSC has never contacted WWAA to discuss how to incorporate agricultural viability or representation into this project proposal or other publicly funded projects.

#### Specific project funding application elements

- SRSC indicates ESRP support helped “address specific areas of concern that were expressed in 2016.” What was this support? How has the project description and process changed from 2016 to 2018? In what ways have changes made the project more viable or beneficial?
- Tidegate replacements designed to improve operations and conditions should not be confused with habitat restoration projects. Careful and deliberate consideration of agricultural production requirements and implications are considered prior to all district tidegate replacements. Further, neither SWC or SRFB have ever recommended or offered funding tidegate replacements outside the Tribe’s reservation bounds. WWAA is not aware of the question asked that SRSC “concludes” related to “the project’s contribution to recovery.”
- SRSC states that while dike setbacks “enjoy broad support from a spectrum of the community” by those who “seek the most effective restoration actions”, they are missing a bigger element of the conversation. The larger community places multiple values on the land in question, and while many people support dike setbacks, they recognize that it is a tradeoff with other values, such as local, viable, and sustained agriculture. Through the Skagit Hydrodynamic Modeling (HDM) project, it was clear that while large setback projects are supported, they are not supported unconditionally.

The Skagit HDM project concluded that projects need to be implemented in a strategic and methodical way to ensure other values, such as long term viability of agricultural land, are preserved. SRSC did not participate in the collaborative elements of the HDM project; the Project application as put forth reflects this lack of appreciation and respect for multiple values on the landscape. WWAA does not question SRSC’s choice to not participate in HDM; however, we do request that the SRSC and Tribe accurately reflect their participation in HDM and approach to recovery. SRSC should not misrepresent their relationship with the agricultural community in application documents or outcomes of their previous projects.

Had the Tribe or SRSC participated in the Skagit HDM Project, or at least submitted Smokehouse project details to the Project co-managers, many of these questions and concerns could have been addressed through the project’s collaborative and technical process. However, as was the case with the Skagit Farm, Fish, Flood Initiative, the Tribes opted not to participate. To now incorporate peripherally-related Project figures and numbers misrepresents the Skagit HDM project, and those that participated collaboratively.

- As is described in the Project proposal, project stakeholders exclusively and solely include the Tribe and members. Potential funders should not be led to believe that a wider group of Skagit County residents and members are knowledgeable or supportive of the Project as presented.
- The outreach plan associated with the Project does not include a larger contingent of the community, as is implied by SRSC. WWAA is not aware of, nor has it refused invitation to, any community event in which this Project, or the Tribe’s “suite of projects” has been described or

discussed. WWAA is not aware of how or when SRSC and the Tribe articulated how their publicly funded work applies to the broader community.

- SRSC's "plan to tell the story" does not include a wider range of stakeholders, nor has "research conducted on the site" informed those outside the Tribe or applied "intriguing and scientifically meaningful" information to any other community member or interest than that of the Tribe.
- Within Project application documents, SRSC states "We have incorporated what we learned from the Wiley Slough, Fir Island Farms, South Fork and Fisher Slough dike setback projects into this proposal". SRSC fails to state that the Wiley Slough project is not yet complete, requires significant additional funding for redesign and repairs, and is not yet funded for construction. Being that SRSC did not complete Wiley Slough, had limited participation in Fir Island or Fisher Slough, and is not including partners on this project, WWAA is curious as to what SRSC "incorporated".
- What "salmon and estuary habitat communities" had knowledge or understanding of SRSC's project or site plans prior to a request for public funding? Who is "reviewing next steps"? Neither NOAA or WDFW have been involved, nor has SRSC discussed this work further in SWC forums, since voluntarily pulling this project from funding consideration in 2016.
- Who is the "agricultural community" described in the Project proposal? WWAA drafted and entered into an agreement designed to strategically "take agricultural land out of production" to meet Chinook Recovery Plan objectives. If there is not "direct opposition" by the agricultural community, what is the indirect opposition for the Project?
- WWAA is concerned about the "contribution this project will make towards recovery goals" relative to its overall cost to the public, and objects to the assertion this Project "reduces pressure on the other privately held ground" to meet recovery goals. This is especially true given the Tribe's recent steps to de-link this project from community and agency goals.
- While SRSC goes to great lengths to articulate limited and reduced project costs, it is concerning that these assertions are based on values rather than engineering feasibility and current industry design standards. It is also unclear what the indirect and unstated costs are, or why the identified costs have been contained. It appears SRSC is willing to compromise agricultural drainage and protection of adjacent lands to limit project costs. This suggests that while SRSC has experience on other large scale projects as stated in application, they are not incorporating lessons learned or acknowledging the failures and liabilities associated with this approach.
- Further, the project description fails to discuss or deliberately avoids discussion on overall land management costs funded by SRFB for the "ongoing suite of restoration actions implemented by the Swinomish Tribal Community since 2005" and the overall benefit for salmon these expenditures produced. Previous project costs cannot be reset or disregarded.
- The Project cost appears high, both in terms of the 10 million dollar estimate for design and construction and the 120 acres of agricultural land conversion. Does the SWC consider this an effective salmon recovery project given that the likely benefit is an estimated 11,000 smolt? This is less than the 13,000 mid-point estimate for smolts from the Cottonwood Island project, and significantly less than the 160,300 mid-point estimate for smolts from the Deepwater 2 project. Given this context, please clarify how this Project, receives such broad support from the lead entity and members.



WWAA questions large investments of public funds to facilitate a project that requires significant flood protection infrastructure, when the Tribe's long-term planning documents make it clear that their intent and expectation is to restore the protected area to estuarine and tidal processes. WWAA seeks clarity over allocations and expenditures, designated for recovery projects supported by the entire community, on such an insular and unclear pursuit by the Tribe and SRSC. Finally, WWAA questions such large investments in short-term projects, with little predicted gains towards recovery goals.

At the earliest convenience, WWAA requests a response to this correspondence. WWAA is involved in other processes, not related to the SRFB or SWC, that require a greater understanding of this project and process. As shown by our participation in the HDM project, and through on-going SWC membership, WWAA will continue to advocate for effective and strategic recovery projects in the Skagit watershed.

Respectfully,



Brandon Roozen  
Executive Director

Cc:

Ken Dahlstedt, Chairman, Skagit Watershed Council

Richard Brocksmith, Executive Director, Skagit Watershed Council

Marc Duboiski, Outdoor Grants Manager, Washington State Recreation and Conservation Office

Attachments (via email):

Smokehouse\_2018 LECC Supplemental Questions

2018 Smokehouse\_Design\_Final\_060818

Applicant Report, 18-1484P (submitted 08\_09\_18 16\_42\_51)

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**STATE OF WASHINGTON**  
**RECREATION AND CONSERVATION OFFICE**

August 22, 2018

Brandon Roozen  
Western Washington Agricultural Association (WWAA)  
2017 Continental Place #6  
Mount Vernon, WA 98273

RE: Smokehouse Tidal Marsh Preliminary Design Proposal  
Skagit River System Cooperative (SRSC); RCO Application #18-1484

Dear Mr. Roozen:

I am responding on behalf of the chair of the Salmon Recovery Funding Board. Thank you for your comments and questions concerning grant application #18-1484 and for your organization's participation as a member of the Skagit Watershed Council (SWC). Citizen participation is a critical component of salmon recovery in Washington State, particularly in the review and prioritization of projects. The experience and network of special purpose district commissioners is a valuable asset to the Skagit process and thus I encourage you to stay fully engaged.

The Smokehouse area has received three grants from the Recreation and Conservation Office (RCO) since 2004 (#04-1626, #07-1827 and #10-1454). Past efforts included installing tidegates to improve fish passage, planting trees, fill removal and marsh restoration. This year's proposal is the largest to date and is for the preliminary design of a future dike setback, potentially restoring 120 acres of tidal wetland/marsh habitat along Swinomish Channel.

Since this proposal is focused on the design phase, I would encourage you and other members of WWAA to participate in the design review process required of large projects. I will work with my staff and the Skagit Watershed Council to make sure your organization is invited to participate in the design process.

For large scale proposals like Smokehouse, it is important to have an active stakeholder group provide continual feedback as the design advances. This ensures the development of the best salmon restoration project while at the same time balancing community values. This is definitely a lesson learned from past Salmon Recovery Funding Board projects in the Skagit delta (Fisher Slough and Fir Island Farm).

I understand that the SRSC and the Swinomish Tribe are hosting a "Smokehouse Tidal Marsh Restoration" project tour this coming Monday, August 27th. I hope you and other representatives from WWAA are planning to attend.





I look forward to seeing how this project moves forward and how the sponsor and the Watershed Council engages the community stakeholders. If you have any questions, please do not hesitate to contact RCO Grants Manager, Marc Duboiski, at (360) 902-3137 or [marc.duboiski@rco.wa.gov](mailto:marc.duboiski@rco.wa.gov).

Sincerely,

A handwritten signature in black ink that reads "Kaleen Cottingham". The signature is written in a cursive, flowing style.

Kaleen Cottingham  
Director

cc: Brian Cladoosby, Swinomish Tribe  
Todd Mitchell, Swinomish Tribe  
Steve Hinton, Skagit River System Cooperative  
Richard Brocksmith, Skagit Watershed Council

**From:** [Lundquist, Wyatt \(RCO\)](#)  
**To:** [Lundquist, Wyatt \(RCO\)](#)  
**Subject:** FW: Salmon Recovery Funding Board, 2018 Skagit Watershed Council project proposal  
**Date:** Monday, November 19, 2018 1:24:13 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[WWAA\\_081518\\_RCO\\_correspondence\\_18-1484P.pdf](#)

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**From:** Cottingham, Kaleen (RCO)  
**Sent:** Monday, November 19, 2018 12:18 PM  
**To:** Galuska, Tara (RCO) <[Tara.Galuska@rco.wa.gov](mailto:Tara.Galuska@rco.wa.gov)>; Lundquist, Wyatt (RCO) <[wyatt.lundquist@rco.wa.gov](mailto:wyatt.lundquist@rco.wa.gov)>  
**Subject:** FW: Salmon Recovery Funding Board, 2018 Skagit Watershed Council project proposal

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**From:** Richard Brocksmith [<mailto:rbrocksmith@skagitwatershed.org>]  
**Sent:** Monday, November 19, 2018 10:42 AM  
**To:** Brandon Roozen <[broozen@westag.org](mailto:broozen@westag.org)>; David <[troutt.david@nisqually-nsn.gov](mailto:troutt.david@nisqually-nsn.gov)>  
**Cc:** Ken Dahlstedt <[kend@co.skagit.wa.us](mailto:kend@co.skagit.wa.us)>; Duboiski, Marc (RCO) <[Marc.Duboiski@rco.wa.gov](mailto:Marc.Duboiski@rco.wa.gov)>; Cottingham, Kaleen (RCO) <[Kaleen.Cottingham@rco.wa.gov](mailto:Kaleen.Cottingham@rco.wa.gov)>; Steve Hinton <[shinton@skagitcoop.org](mailto:shinton@skagitcoop.org)>; Todd Mitchell <[tmitchell@swinomish.nsn.us](mailto:tmitchell@swinomish.nsn.us)>; Jon-Paul Shannahan <[jonpauls@UPPERSKAGIT.com](mailto:jonpauls@UPPERSKAGIT.com)>; Brokes, Brendan J (DFW) <[Brendan.Brokes@dfw.wa.gov](mailto:Brendan.Brokes@dfw.wa.gov)>  
**Subject:** RE: Salmon Recovery Funding Board, 2018 Skagit Watershed Council project proposal

Brandon,

Thank you for copying me and the Watershed Council on this correspondence, and for your participation in reviewing proposals this year. I very much appreciate your open and transparent communication about the Smokehouse estuary restoration project and the general state of agriculture's relationship to salmon recovery in general. It is this type of investment in participation, communication and relationship-building that will help us find common ground and common benefits in the Valley as we move forward.

After discussing the procedural hiccups in the last salmon habitat project grant round with SWC's Board of Directors, we, like you, are frustrated that important voices like yours and the interests you represent, weren't more effectively shared, considered, and addressed in a timely manner in our collaborative process. We believe that there was good intent on all sides to do this, yet SWC and WWAA didn't fully utilize the strength of our robust process to collect many of your valid points and questions. I will personally re-double my efforts to reach out to you early and often to ensure these insights on projects are incorporated where they can be most effectively addressed, and we hope you will do the same. Our Board of Directors, and myself, are committed to maintaining integrity in the process and its outcomes.

As you know, once proposals are approved locally they are passed onto RCO to fund and establish a contractual relationship that is managed between the local sponsor and an RCO Outdoor Grant Manager. SWC is not a direct participant in the grant compliance process except in the occasional instance where conditions are placed into the contract at the request of SWC, which are then



tracked and met during project implementation. SWC respects that proponents and RCO will follow through in implementation as promised. In special circumstances, we will stay involved in project development to ensure broad support for the final project to be implemented. We anticipate staying engaged at that level for such an important project like Smokehouse.

Further though, SWC is heavily engaged and responsible during proposal review where it is incumbent on our community partnership to consider many technical and socioeconomic factors including (as you've suggested in your letter) the proponent's success and previously agreed-upon obligations as indicators of whether proposed projects will deliver necessary outcomes. In that context, there are several points raised in your letter which can be partially addressed now. They include:

- Long-term protection of adjacent land uses and cost implications of infrastructure permanence – Members of our Technical Review Committee (TRC) and Lead Entity Citizens Committee (LECC) asked about adjacent land uses during site visits in 2016 and 2018. Tribal staff responded that adjacent land uses immediately in front of and behind the proposed setback levee are zoned agricultural, whereas areas to the north (yet still south of SR20) are zoned commercial. No other permanent protections exist in this area. The ag lands are owned by SITC and/or are allotments owned by multiple tribal members. There are no plans to remove the interior lands from agricultural production, so new levees are required to maintain current conditions protecting private lands and ag. Further, SWC has never required that adjacent land uses have any type of permanent land-use protections since it is outside of the project footprint, and at least partially since zoning in these low-lying areas is highly unlikely to be up-zoned to commercial or residential development. While there would be cost implications relevant to our current investment if additional estuary is restored by some future phase at this location, I do not personally see how that would preclude moving forward here and now as long as it is on the order of decades and not years given the dire nature of fisheries and orca resources in the Skagit and the Salish Sea. That said, your letter raises an interesting question about longevity, one which we must continue to explore as we move forward.
- Transparency and effectiveness of previous investments at the site – As you know, there have been several iterations of project implementation and thus funding for restoration of salmon habitat at Fornsby Slough and Smokehouse. Dredging spoils have been excavated and removed, tidal channels have been expanded with access provided by a series of tide gates, and riparian buffers have been planted. SRSC and SITC have committed significant funds of their own as well as state & federal grant funds to steadily and thoughtfully build monitoring data related to fish use, habitat, and water quality changes at this site compared to reference and other treatment sites. This information has been presented multiple times to the SWC during quarterly Council of Members meetings (see powerpoints on relevant benefits of fill removal, tidegate removal, and tidegate improvements, etc.) and during multiple site visits. Not only have these investments returned fish habitat and increased fish productivity, but they have also educated us about how to restore more effective fish habitat across the delta. Those investments yielded the evidence that past enhancements could be expanded by setting back the levees at Fornsby/Smokehouse to increase rearing habitat. While in hindsight we could have been more cost-effective if the project skipped tidegate placements and immediately went to levee setback, the scientific certainty gained from methodically studying various treatments has been critical to answering questions from groups like those you represent about the effectiveness of our actions. And of course, tidegate hardware at the site will be re-used at sites inland to be as cost effective as possible with past funding.
  - It should also be noted that while monitoring information has taken some time to be collected and analyzed and communicated, there is a stated desire to share this

information in a way that meets as many stakeholder questions as possible in credible ways. What has been the impact on adjacent agriculture fields from increased fish access and salinity? SRSC has stated their desire to sit down with WSU Skagit County Extension and other agricultural interests to hear questions about project effectiveness and then provide answers where possible in a format and venue most helpful to that goal. SWC hopes that WWAA would participate in preparing that discussion for this winter. I know that there is still much learning to be had by sharing questions and information among all stakeholders.

- McGlenn Causeway and North Fork Avulsion Implications and Cost Effectiveness – While there have been changes in the system recently at the avulsion site, and stressors in the form of water and fish barriers continue at McGlenn Causeway, the opportunity and appropriateness for salmon habitat restoration at Smokehouse stands alone for effectiveness as proposed. Of course, SWC and many of our members are committed to continuing to advocate for removing or reducing barriers, including McGlenn, which will reconnect partially isolated habitats and be very cost effective treatments as well as improvements to previous investments like Smokehouse. If alternative sites existed that would allow more cost effective approaches to habitat restoration nearer primary migration routes through the tidal delta, SWC would strongly advocate to spend limited financial assets in those locations. Until that happens, SWC is faced with doing whatever feasible and effective projects exist when they can be proven out, such as the Smokehouse proposal. Thus, it is a truism that the sooner we find credible, feasible pathways to restoring enough estuarine habitat and habitat connectivity to meet these goals the more effective and cost effective our efforts will likely be and the less impact there will likely be on adjacent land uses and values such as agriculture.
- Progress since 2016 - Several improvements were recommended in 2016 to the project proposal, including better justifying how the preferred alternative and levee standards were selected, better understanding design implications for impacts to the Swinomish Channel and permitting, and expanded community outreach to stakeholders such as Corps of Engineers, the agricultural community, and residential neighbors. Many of these recommendations were addressed in the intervening years, partially with ESRP funding that supported hydrologic modeling and geotechnical assessment to address technical uncertainties. ESRP's investments also went to riparian plantings. If funding is awarded in 2019, more of this work will continue.
- Broad stakeholders - The answers to LECC supplemental questions clearly indicate multiple stakeholders that will be included in SRSC and SITC efforts to finalize design as SWC requested in 2016, including tribal/federal agencies, navigation channel stakeholders, natural resource managers/user groups (including ag interests), and salmon and estuary restoration interests. Each has a role and a planned approach for how to include them in the design process. It is not accurate to say the project proponents identified SITC and its members as the exclusive and sole stakeholders for this project. The project and our programs would be highly benefitted by agriculture's involvement.

Many statements in your letter make clear that there is a strained relationship and lack of trust and mutual support for each other's goals between the agricultural and tribal communities. I cannot comment on this general observation as it seems like it is an issue that can only be fully addressed between the parties. That said, SWC stands ready to support you as requested and to ensure adequate and appropriate dialogue between interests when considering public investment in voluntary habitat projects, or any other topic mutually supported by our members. While it wasn't discussed in that direct context during the 2018 review of the Smokehouse proposal, we agree there is much to be gained by working collaboratively in sharing insights and lessons learned between entities and agencies that have successfully completed similar projects. Some of that will happen naturally as Smokehouse progresses, but the team and process put forward by WDFW's Snow Goose



Preserve restoration project (i.e. Fir Island Farms) was indeed exemplary and to be emulated.

As an important reaffirmation to an implied reference to Wiley Slough in your letter, there should be no doubt that SWC is committed to sticking with our vetted projects long after they are constructed to ensure that we learn every lesson possible, support necessary follow-ups, and that our commitment to being good neighbors is met.

Finally, it is likely that I haven't addressed every concern your letter has raised, or I've raised additional questions in this brief response, but I hope this is helpful in several instances nonetheless. I'm also hopeful that we can continue a dialogue on remaining topics and future projects, including bringing in other stakeholders.

As you know, SWC adopted a resolution on September 7, 2017 that commits us to recognizing and valuing the role and uses that society has developed on this landscape and that all stakeholders and economic sectors must work together to establish healthy ecosystems and an equitable social system that is resilient to current and future stressors; and that we will engage in mutually-beneficial dialogue, strategies, and actions that benefit all watershed interests and shall engage in good faith in forums to that end. The Board of Directors and I stand ready to work with you and any other watershed interest to implement that directive.

Sincerely,  
Richard

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Richard Brocksmith  
Executive Director, [Skagit Watershed Council](#)  
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**From:** Brandon Roozen <[broozen@westag.org](mailto:broozen@westag.org)>  
**Sent:** Wednesday, August 15, 2018 4:14 PM  
**To:** David <[troutt.david@nisqually-nsn.gov](mailto:troutt.david@nisqually-nsn.gov)>  
**Cc:** Ken Dahlstedt <[kend@co.skagit.wa.us](mailto:kend@co.skagit.wa.us)>; Richard Brocksmith <[rbrocksmith@skagitwatershed.org](mailto:rbrocksmith@skagitwatershed.org)>; Duboiski, Marc (RCO) <[Marc.Duboiski@rco.wa.gov](mailto:Marc.Duboiski@rco.wa.gov)>  
**Subject:** Salmon Recovery Funding Board, 2018 Skagit Watershed Council project proposal

Good afternoon David,

I am sending you this correspondence as the Salmon Recovery Funding Board Chairman.

Please see the attached document relating to a project proposal, reviewed and recommended by the Skagit Watershed Council. A hard copy will go in tomorrow's mail. Attached in email, I have included some of the project proposal documents, which are referenced in our letter.

Respectfully,

Brandon Roozen

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Brandon Roozen

Executive Director

Western Washington Agricultural Association

2017 Continental Place #6

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OCT 17 2018

WA STATE  
RECREATION AND CONSERVATION OFFICE

Recreation and Conservation Office  
Attn: Board Liaison  
P.O. Box 40917  
Olympia, WA 98504-0917

Re: The Columbia Land Trust's 2010-2017 Klickitat River "Floodplain restoration" project

Salmon Recovery Funding Board (SRFB) members and staff:

As a retired fish biologist, in 2007 and 2008 I served as a county representative on the state's Technical Advisory Group (TAG) which covers the Klickitat River drainage. During that time we voted unanimously to support a Columbia Land Trust grant application to your Board for purchase of about 15 miles of upper Klickitat River frontage. We were elated when that grant proposal was approved.

Yet, a couple of years after leaving the TAG group I felt it necessary to begin questioning the Land Trust's zealous emphasis in removing an 80-year-old railroad bed which paralleled the river along the entire acquired riverfront. My three major fishery concerns regarding that project were:

- 1.) Elimination of the old railroad bed, not fish habitat restoration, was the project's overriding goal. Resulting damage to fish habitat may well have exceeded any fish habitat benefits achieved.
- 2.) Misleading and/or exaggerated claims of expected fish habitat improvement were applied in making grant proposals and in seeking public and agency support.
- 3.) SRFB grants totaling several million dollars were provided for nearly ten years to the project. These state funds were earmarked primarily for fish habitat recovery, but most of the Klickitat work instead involved land "reshaping" to remove evidence of the railroad bed. A major portion of those funds could have been utilized far more appropriately elsewhere.

I acknowledge that selective removal of some deleterious introduced railbed material from the river and its banks was a worthy objective. Too, converting remaining portions of the old railroad bed to better wildlife habitat via vegetation plantings made sense.

But beginning in 2011 it soon became obvious that project removal of rock from the river and its banks was occurring on a grandiose scale. And throughout the following six years the Land Trust and its Yakama Nation partner appeared intent on unnecessarily extracting most, if not all, fill material once introduced by the railroad. After 80 years, however, much of that material contributed to healthy fish habitat. Even rocky banks which had eventually accumulated enough river silt to support hardwood and shrub growths were dredged and hauled away. Dredging rightfully should have been limited to only shorter bank sections where introduced rock was extreme and supported no riparian vegetation. But by the end of the project, over eight collective miles of riverbank were dredged nearly bare (See attached photo example), in places down to bedrock.

Misleading or exaggerated proponent claims of expected fish habitat benefits (item 2 above) included: creation of natural pools and more large woody debris, former side channel recovery, and water temperature improvement. However, during the project I repeatedly emphasized to involved parties that the only pools to form may well be the few which were arbitrarily dug with the project's heavy equipment; large woody debris is already plentiful without foreseeable need to provide more; the only reopened former side channels I've found resulted from past floods, not project work; there is presently no apparent temperature problem in the main river, and expected shade improvement by post-dredging vegetation plantings has been offset by project removal of much riparian vegetation, especially dense and tall volunteer red alder trees.

Despite a former 35 year career spent working closely with fish habitat issues (OFWD), when making suggestions throughout the Klickitat project I was typically ignored by those involved. While citing support from various sources, the Trust let widespread landshaping and river disturbance represent proper stewardship. Although I had worked cooperatively in the TAG group with Yakama Nation staff, those members later rejected my requests to discuss the project. WDFW habitat biologists I contacted appeared of the opinion that any material cast over the riverbank by the railroad decades ago should be removed (though some other WDFW biologists privately agreed with me). And a letter of concern I sent to the SRFB received no response.

Two primary factors contributed to this exclusion process. First, the Columbia Land Trust and Yakama Nation are commendable organizations with whom agencies have had a good and lengthy working relationship. So why, the agencies concluded, should there be objections to the positive sounding Klickitat proposal? Secondly, an attitude prevailed that what began as a worthwhile appearing endeavor should logically run its routine course; but that assumption then led to lax agency oversight.

Mine was not the only voice of objection as the project progressed. Extremely muddy river flows from bank and in-water dredging at times curtailed fishing downstream, causing anglers to complain. This resulted in on-site reviews between the Land Trust and state regulatory agencies, followed by some work schedule changes. And upon hearing of my related concerns, a federal EPA official once contacted me for information.

Out of basic respect for the Land Trust and conservation agencies involved, I have not approached conflict-hungry media about my Klickitat concerns. Moreover, I don't wish legislators to have reason to reduce state funds provided for fish habitat restoration. I've written this letter mainly to document that throughout the project negative impacts on fish habitat were reported but typically allowed to continue. Nevertheless, its message will hopefully reach some receptive ears and contribute to improved habitat projects in the future. I need no reply, and those interested in this issue can feel free to contact me should they have questions or comments.

Sincerely,



Jim Hutchison

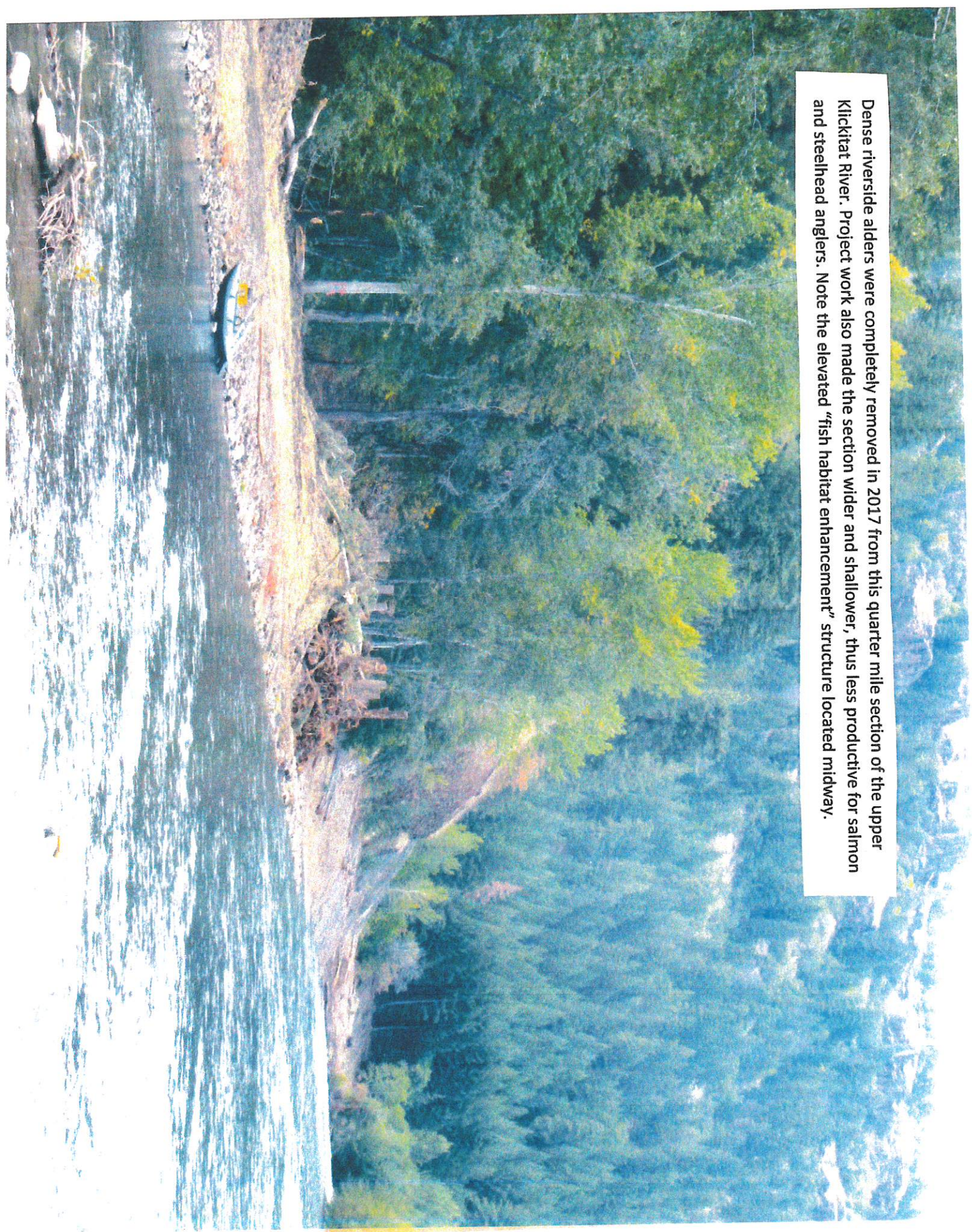
360 837-8011

[wilandhutch@gmail.com](mailto:wilandhutch@gmail.com)

cc: Columbia Land Trust  
Yakama Nation Fisheries  
Governor's Salmon Recovery Office ✓  
WDFW, Ridgefield



Dense riverside alders were completely removed in 2017 from this quarter mile section of the upper Klickitat River. Project work also made the section wider and shallower, thus less productive for salmon and steelhead anglers. Note the elevated "fish habitat enhancement" structure located midway.





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Web site: [www.rco.wa.gov](http://www.rco.wa.gov)

**STATE OF WASHINGTON**  
**RECREATION AND CONSERVATION OFFICE**

November 8, 2018

Mr. Jim Hutchinson  
1010 NW 4<sup>th</sup> Avenue  
Camas, WA 98607

Dear Mr. Hutchinson:

Thank you for your October 15, 2018 letter regarding the Columbia Land Trust's Klickitat River Floodplain Restoration Phase 6 project (RCO project #14-1860, and multiple phases – also known as the Klickitat Haul Road project). I understand that over the course of the project you have had concerns regarding benefits to fish in the area. These concerns, documented in your letter, will be shared with the Salmon Recovery Funding Board (SRFB) at their December 2018 meeting.

As you know the SRFB process is an inclusive, bottom-up approach that brings together citizens from the local communities and individuals with the technical expertise such as yourself to review proposed projects so that state funds will provide the best benefits for the resource. The process involves local technical and citizen groups, through the local lead entity, submitting a ranked list of projects to the SRFB for funding. This means that the highest priority projects from a local technical and community standpoint are proposed for funding. In addition, the SRFB has a state level technical review panel that reviews the cost-benefit and likelihood of success of each proposed project on the local list.

The Klickitat River Floodplain Restoration Phase 6 project went through that local process, was reviewed by the state technical review panel, recommended for funding by the local citizens group, and as a result of this process was funded by the SRFB.

I understand your concerns. Given the status of this multi-phased projects, I hope that you were able to engage at the local level to share your concerns. Once a project is funded, the local sponsor must engage the permitting process where sedimentation and water quality is typically addressed. My staff tells me that our files show that all permits were received prior to moving forward with the project. Knowing that background may help alleviate some of your concerns about the long terms impacts of this project to salmon and salmon habitat.

I appreciate your comments and hope you will continue to be involved in the local process.

Sincerely,

Kaleen Cottingham  
Director



To the members of the Salmon Recovery Funding Board,

The challenges to Washington state's salmon and orca continue to outstrip the funding available to help these species recover. This problem is compounded when organizations responsible for supporting salmon recovery mismanage those limited resources.

The status of salmon, steelhead, and orca is critical. According to the Puget Sound Partnership's 2017 State of the Sound, Chinook salmon population is "below the 2020 target," and is "not improving."<sup>1</sup> Orcas are faring even worse, with the population "below the 2020 target," and "getting worse."<sup>2</sup>

If we are committed to helping recover salmon and orca populations, we cannot reward waste and must hold accountable those who mismanage this much needed funding for salmon recovery.

Seattle City Light is requesting \$1.6 million from the Salmon Recovery Funding Board. They also recently announced agency cost overruns amounting to \$188 million. Given this mismanagement, we ask the Salmon Recovery Funding Board to reject City Light projects and prioritize other jurisdictions in need.

First, state funding should focus on areas of need. Across the Puget Sound region, many small communities struggle to find funding for critical projects. Many communities are willing to help salmon, but simply cannot access the resources to do so. The City of Seattle, by way of contrast, has the resources but is simply unwilling to prioritize salmon recovery.

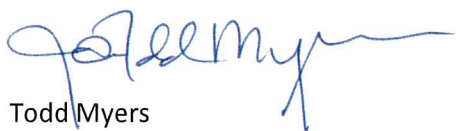
Second, projects from Seattle City Light and the City of Seattle compete with other worthwhile projects. Currently, there are proposals for salmon recovery projects worth \$75 million to the SRF Board.<sup>3</sup> This far exceeds available funding. Rather than funding salmon protection, Seattle City Light is asking state taxpayers to backfill money it wasted elsewhere, reducing the funding pool for worthwhile projects.

Some may argue the need to fund projects in Seattle is important to salmon recovery. Indeed, we agree. The City of Seattle, however, cannot simultaneously highlight the critical need for funding while wasting huge sums of money that could be used to save salmon and orca.

The people of Washington, tribes, non-profit organizations, fishing advocates, and agency workers are dedicated to restoring salmon populations. Rather than continue with business as usual, it is time to hold accountable those who hinder these efforts and then ask to be bailed out of their bad decisions.

We strongly urge the Salmon Recovery Funding Board to make a clear statement that salmon funding will focus on communities in need, rather than those who use state funding as an excuse to avoid their responsibility to contribute to salmon recovery.

Sincerely,



Todd Myers  
Washington Policy Center  
Puget Sound Salmon Recovery Council

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<sup>1</sup> Puget Sound Partnership, "Vital Sign: Chinook Salmon," <http://psp.wa.gov/vitalsigns/salmon.php>

<sup>2</sup> Puget Sound Partnership, "Vital Sign: Orcas," <http://psp.wa.gov/vitalsigns/orcas.php>

<sup>3</sup> Washington State Recreation and Conservation Office, "Project Search," <https://secure.rco.wa.gov/prism/search/projectsearch.aspx>

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**STATE OF WASHINGTON**  
**RECREATION AND CONSERVATION OFFICE**

August 15, 2018

Mr. Todd Myers  
Washington Policy Center  
Puget Sound Salmon Recovery Council  
Sent via email [tmyers@washingtonpolicy.org](mailto:tmyers@washingtonpolicy.org)

RE: Seattle City Light (SCL)  
Salmon Recovery Funding Board (SRFB) Grant application  
Skagit Watershed Habitat Acquisition II; #18-1502

Dear Mr. Myers:

Thank you for your concerns over the state of Washington's salmon and orca populations, specifically, in the Puget Sound. We appreciate your involvement in the Puget Sound Salmon Recovery Council. It's great to see the Puget Sound Partnership's (PSP) vital signs and my agencies project search being utilized effectively to conduct research. The commitment from people like you will eventually lead these two critical species toward recovery.

I wanted to take this opportunity to provide more background information on the SRFB grant making process, and shed more light on the specific proposal by SCL that you mention in your letter. First, as you may know, we have 15 "lead entities", or watershed groups, in the Puget Sound, that are the local organizations that solicit for salmon habitat protection, restoration and design proposals in their watersheds. After collecting the proposals, their local scientists and citizens evaluate the biological benefits and certainty of success, and rank the projects, respectively. These ranked lists are then submitted to the SRFB for funding consideration and projects that have received a favorable technical review from the SRFB's technical review panel, and fit into the funding allocation for each lead entity area, are awarded grant funds.

At this time, SCL has submitted an acquisition grant application to the Skagit Watershed Council (SWC), the lead entity for the Skagit River watershed. The SWC is finalizing the ranking of all their 2018 salmon grant applications to be submitted to our office August 15th. SCL is an applicant at this time competing against the other grant applicants in the Skagit watershed.

SCL's grant request is for \$1.6 million with \$282,284 proposed as match. They are partnering with the Skagit Land Trust, a local non-profit, based in Mt. Vernon, WA, to use \$1.88 million pursue the acquisition of high priority riparian floodplain habitat benefitting Chinook salmon and steelhead trout with the Skagit River watershed.



I hope this helps with understanding how the SCL grant application is targeting key habitat acquisitions along the Skagit River, and its tributaries. The Skagit River, and its salmonid and steelhead stocks, are critical to the success of achieving recovery throughout Puget Sound.

If you have any questions, please call Marc Duboiski at 360.902.3137 or e-mail to [marc.duboiski@rco.wa.gov](mailto:marc.duboiski@rco.wa.gov).

Sincerely,

A handwritten signature in black ink that reads "Kaleen Cottingham". The signature is written in a cursive, flowing style.

Kaleen Cottingham  
Director

cc: Richard Brocksmith, Skagit Watershed Council  
Denise Krownbell, Seattle City Light





Beaux Arts Village  
Bellevue  
Bothell  
Clyde Hill  
Edmonds  
Hunts Point  
Issaquah  
Kenmore  
Kent  
King County  
Kirkland  
Lake Forest Park  
Maple Valley  
Medina  
Mercer Island  
Mill Creek  
Mountlake Terrace  
Mukilteo  
Newcastle  
Redmond  
Renton  
Sammamish  
Seattle  
Shoreline  
Snohomish County  
Woodinville  
Woodway  
Yarrow Point

Cedar River Council  
Friends of the Cedar River Watershed  
Friends of the Issaquah Salmon Hatchery  
Greater Seattle Chamber of Commerce  
Long Live the Kings  
Mid-Sound Fisheries Enhancement Group  
Mountains to Sound Greenway  
Northwest Marine Trade Association  
Sno-King Watershed Council  
Trout Unlimited  
Water Tenders

Alderwood Water and Wastewater District  
National Oceanic and Atmospheric Administration  
US Army Corps of Engineers  
Washington Departments:  
Ecology  
Fish and Wildlife  
Natural Resources  
Washington Association of Sewer and Water Districts  
King Conservation District

November 15, 2018

Salmon Recovery Funding Board  
c/o Recreation and Conservation Office  
P.O. Box 40917  
Olympia, WA 98504-0917



Dear Chair Troutt and Salmon Recovery Funding Board Members:

On behalf of the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Salmon Recovery Council—a partnership of 28 local governments and stakeholder representatives from community groups, citizens, business, and state and federal agencies working collaboratively on salmon recovery—thank you for continuing to provide a vision for recovering salmon in Washington. We appreciate your leadership and support of watershed-based habitat restoration efforts around the state.

We are writing in support of the *Meadowdale Beach and Estuary Restoration Project*, which has been identified as a “Project of Concern” by the Technical Review Panel due to its cost. This project—sponsored by Snohomish County Parks—will provide salmon habitat benefits along a segment of Puget Sound shoreline that is constrained by the BNSF railroad. Habitat enhancements are expected to benefit salmon populations from multiple watersheds, and the sponsor is establishing a model for how to work successfully with BNSF to implement a process-based restoration project. Notably, the Technical Review Panel remarked that this project maximizes the habitat restoration potential at the site.

While the Meadowdale project will be expensive to implement, the sponsor’s request from the Salmon Recovery Funding Board is modest in relationship to the full project cost. The cost is high in part because of other objectives being advanced concurrent with habitat enhancement. Additionally, working with BNSF is an expensive endeavor because the project must maintain the continued functionality of the railroad. Considering the habitat benefits and the value of improving coordination with BNSF on these types of projects, we view Meadowdale to be a worthwhile investment in restoring our watershed’s limited nearshore habitat.


The design phase of this project was identified as a Project of Concern in 2015, also due to cost, and you elected to approve funding for the project at that time. We ask you to again support our funding recommendation for this project, which will achieve half of WRIA 8’s ten-year habitat target for pocket estuary restoration.

The attachment outlines a more detailed discussion on project costs and some considerations for evaluating cost-benefit, prepared by the WRIA 8 Project Subcommittee. Thank you for your consideration of this request. If you have any questions, please contact WRIA 8 Salmon Recovery Manager Jason Mulvihill-Kuntz at 206-477-4786 or [jason.mulvihill-kuntz@kingcounty.gov](mailto:jason.mulvihill-kuntz@kingcounty.gov).

Sincerely,



John Stokes  
Chair, WRIA 8 Salmon Recovery Council  
Councilmember, City of Bellevue



Mark Phillips  
Vice-Chair, WRIA 8 Salmon Recovery Council  
Councilmember, City of Lake Forest Park

Enclosure: WRIA 8 Project Subcommittee Statement on Project Costs and Review Panel Cost-Benefit Evaluations

Cc: WRIA 8 Salmon Recovery Council members

Kaleen Cottingham, Director, Recreation and Conservation Office (RCO)

Sheida Sahandy, Executive Director, Puget Sound Partnership

David Troutt, Chair, Puget Sound Salmon Recovery Council

Dave Herrera, Vice Chair, Puget Sound Salmon Recovery Council

Bill Blake, Vice Chair, Puget Sound Salmon Recovery Council

Snohomish County Council members

Dave Somers, Executive, Snohomish County

Tom Teigen, Director, Snohomish County Parks, Recreation, and Tourism

Tom Slocum, Chair, SRFB Technical Review Panel

Tara Galuska, Salmon Section Manager, RCO

Amber Moore, Salmon Recovery Manager, Puget Sound Partnership

Suzanna Smith, PSAR Program Manager, Puget Sound Partnership

# WRIA 8 Project Subcommittee Statement on Project Costs and Review Panel Cost-Benefit Evaluations

November 15, 2018

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The WRIA 8 Project Subcommittee is an interdisciplinary team of professionals that perform the watershed-based evaluation of grant proposals submitted for funding in WRIA 8. The observations that follow are being provided to the Salmon Recovery Funding Board (SRFB) as a result of the Project of Concern (POC) designation for Snohomish County Parks' Meadowdale Beach and Estuary Restoration Project.

The comment form provided by the SRFB Technical Review Panel (Review Panel) for the Meadowdale project states *"the sponsor has maximized the habitat restoration benefit potential at the site, and the project offers a unique opportunity to provide salmon access and habitat connectivity beyond the railroad grade."* In addition to offering the best habitat outcome for salmon at this site, Meadowdale demonstrates how to effectively engage and collaborate with the BNSF railroad to design and implement a project along a heavily-trafficked rail corridor—this is a significant achievement.

Meadowdale is a multi-benefit project, meaning it will improve habitat for salmon while achieving other objectives. Multi-benefit projects are increasing in number, and this approach to project implementation is opening up restoration possibilities in locations where habitat enhancement may have previously been limited due to perceived competing interests. These projects can be expensive, but they are an efficient use of public funds in that they bring disparate project goals together in an integrated solution. Reflecting a diversity of project objectives, multi-benefit projects draw on numerous funding sources to design and implement. Our observation is that SRFB and Puget Sound Acquisition and Restoration (PSAR) funds comprise a relatively small portion of a multi-benefit project's overall funding strategy, but these funds support and enable the essential salmon habitat aspects of multi-benefit projects and provide important financial contributions.

Multi-benefit projects offer an important opportunity for advancing salmon recovery, and awarding salmon recovery grant funds to a project drives a better habitat outcome than would be attained otherwise. Local watershed technical committees and the Review Panel challenge project sponsors to maximize habitat gains. Without SRFB or PSAR contributions, those same projects are likely to have less favorable and limited habitat outcomes.

When a multi-benefit project is proposed for salmon recovery funding, the lead entity works with the sponsor to scale the salmon funding request to an amount that reflects the habitat enhancement proposed at the site. For Meadowdale specifically, the sponsor's request from the SRFB equals approximately 6% of the total construction cost. During the WRIA 8 Project Subcommittee's review of this project, we agreed it is a worthwhile investment given the complexities and the process-based nature of the project design.

Regarding the Review Panel's perspective that Meadowdale has a high cost relative to the anticipated benefits, their comments say *"the Review Panel is asked to focus on evaluating the overall costs and biological benefits of a project independent of...other societal benefits."* Given that the Review Panel

does not evaluate the full scope of project elements that are unrelated to habitat enhancement or will not influence the habitat function of the site, we respectfully submit that the Review Panel's consideration of the total project cost—including those elements that are peripheral to habitat enhancement—is outside of the scope of their review.

We agree it is important for the Review Panel to understand how proposed habitat elements fit within the context of a larger project, but we also think it more appropriate for the cost-benefit evaluation to be limited to the biological components of the project. The Manual 18 guidance on cost-benefit leaves room for interpretation, and absent clear policy direction on the scope of review as it pertains to the cost-benefit criterion, we may continue to see high cost, multi-benefit projects labeled as POCs, requiring appeals to the Board on a case-by-case basis. The Meadowdale project is an example of this—the project was identified as a POC in 2015 due to cost concerns from the Review Panel, and the project is again identified as a POC in 2018 on the same basis.

We acknowledge that the Review Panel has a very challenging job, and they do it with skill and professionalism. However, the current approach to cost-benefit analysis may ultimately discourage some project sponsors from seeking SRFB and PSAR funds and from including salmon habitat restoration design features in their projects. In turn, we recommend that the Board clarify the cost-benefit criterion in the 2019 update to Manual 18 and limit the cost-benefit evaluation to the costs being proposed for salmon recovery funding and costs directly influencing proposed biological benefits.

Thank you for your continued support for locally-driven salmon recovery in Washington and for your consideration of this particular issue and our associated request.

#### WRIA 8 Project Subcommittee Members (2018)

Tor Bell, Mountains to Sound Greenway Trust

Jim Bower, King County

Diane Buckshnis, City of Edmonds

Peter Holte, City of Redmond

Cyndy Holtz, City of Seattle

Mark Phillips, City of Lake Forest Park

Robert Plotnikoff, Snohomish County

Scott Stolnack, King County/WRIA 8

Elizabeth Torrey, Washington Department of Fish and Wildlife



**From:** [Lundquist, Wyatt \(RCO\)](#)  
**To:** [Lundquist, Wyatt \(RCO\)](#)  
**Subject:** FW: Salmon Recovery Funding Board Meeting Agenda, Dec. 5/6 2018 comments  
**Date:** Tuesday, November 27, 2018 11:41:35 AM

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**From:** Finch, Tammy (RCO)  
**Sent:** Tuesday, November 27, 2018 7:00 AM  
**To:** Haifley, Alexis (RCO) <[alexis.haifley@rco.wa.gov](mailto:alexis.haifley@rco.wa.gov)>; Lundquist, Wyatt (RCO) <[wyatt.lundquist@rco.wa.gov](mailto:wyatt.lundquist@rco.wa.gov)>  
**Subject:** FW: Salmon Recovery Funding Board Meeting Agenda, Dec. 5/6 2018 comments

*Tammy Finch*  
Agency Operations Specialist  
(360) 725-3936  
[Recreation and Conservation Office](#)  
Office hours M-F 7:00-3:30

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**From:** James Heytvelt [<mailto:jmheyvelt@wavecable.com>]  
**Sent:** Monday, November 26, 2018 3:25 PM  
**To:** Finch, Tammy (RCO) <[tammy.finch@rco.wa.gov](mailto:tammy.finch@rco.wa.gov)>  
**Subject:** Salmon Recovery Funding Board Meeting Agenda, Dec. 5/6 2018 comments

Hello Salmon Recovery Board.

I fully support the actions of the RCO and the Salmon Funding Board and the recommendations in the agenda for the December 5/6th 2018 meeting.

Fully funding all salmon recovery projects at this time is critical. If approved, these recommendations will also make available many more dollars thru the matching funds available.

My community has been working for many years to advance our project. Prizm # 18-1470. The Harper Bridge construction and shoreline armor removal project which is ranked # 11 on the PSAR large cap listing.

Substantial funds have been spent to date on this project and others on the various grants. Many are designed, permitted and shovel ready.

Time is critical to save our salmon and the environment upon which they, the salmon, require.

I want to just take a moment to thank all of the scientific community, volunteer citizens, government entities and others who have advanced all these projects to present to Governor Inslee and the 2019 Legislature.

Thank you

Jim Heytvelt  
Harper Washington

James Heytvelt  
[jmheyvelt@wavecable.com](mailto:jmheyvelt@wavecable.com)

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Port Orchard Washington 98366