



Snohomish Tribe of Indians  
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## SNOHOMISH TRIBE OF INDIANS

### FORMAL SEPA COMMENT LETTER

#### Mitigated Determination of Nonsignificance (MDNS)

#### Williams Northwest Pipeline LLC – Huntingdon Connector Project

SEPA No. 202602451

#### I. Introduction

The Snohomish Tribe of Indians respectfully submits these comments regarding the proposed Mitigated Determination of Nonsignificance (MDNS). Our community has maintained continuous cultural, historical, genealogical, and spiritual ties to our ancestral homeland and therefore has a substantial interest in the stewardship of its lands, waters, fish, wildlife, plants, and animals

The Tribe appreciates the effort undertaken by the co-lead agencies. However, we believe the record does not yet fully satisfy the intent of the State Environmental Policy Act (SEPA), which requires informed decision-making based upon a thorough evaluation of probable environmental impacts, cumulative effects, and reasonable mitigation measures.

#### II. Traditional Ecological Knowledge

For thousands of years the Snohomish people viewed the natural world as an interconnected system rather than isolated resources. Every tree, plant, animal, salmon, shellfish, bird, wetland, river, and forest possesses value. Healthy water resources and a healthy surrounding ecology were paramount to our survival, culture, identity, and economy.

This traditional ecological knowledge closely aligns with modern ecological science, recognizing that biodiversity, mature forests, functioning wetlands, wildlife corridors, and clean water create resilient ecosystems capable of adapting to changing environmental conditions.

### III. Areas Where the MDNS is Vulnerable

The MDNS acknowledges increased greenhouse gas emissions but relies primarily on compliance with the Climate Commitment Act. Purchasing emissions allowances satisfies statutory compliance requirements but does not eliminate localized environmental impacts.

The document provides limited discussion of cumulative impacts associated with increased regional natural gas transmission capacity, indirect effects on wildlife movement, watershed health, groundwater, mature trees, invasive species, operational noise, lighting, or long-term climate resilience.

The absence of long-term monitoring and adaptive management makes it difficult to verify whether predicted impacts remain accurate after construction.

### IV. Potential Loopholes

- Incremental equipment replacements may avoid comprehensive environmental review.
- Existing industrial footprints may obscure recurring impacts from maintenance and operational changes.
- Reliance on regulatory permitting may be interpreted as complete mitigation despite continuing ecological effects.
- Limiting archaeological discovery protocols to one location increases risk to previously undocumented cultural resources.

### V. Requested Mitigation

The Tribe respectfully requests that the agencies require:

- Comprehensive cumulative impacts analysis.
- Protection of mature trees wherever feasible.
- Native vegetation restoration using locally appropriate species.
- Wildlife corridor protection and habitat connectivity improvements.
- Stormwater, groundwater, and surface-water monitoring.

- Air quality, greenhouse gas, noise, and wildlife monitoring throughout operation.
- Adaptive management if monitoring demonstrates impacts greater than predicted.
- Project-wide Inadvertent Discovery Protocols.
- Continued consultation with Tribes and descendants of the Treaty of Point Elliott when cultural resources may be affected.

## VI. Applicable Authorities

These recommendations are supported by:

- RCW 43.21C (State Environmental Policy Act)
- WAC 197-11 (SEPA Rules)
- RCW 36.70A (Growth Management Act)
- RCW 70A.65 (Climate Commitment Act)
- RCW 43.21C.520
- RCW 70A.65.080
- Washington Department of Ecology SEPA Handbook
- Washington Department of Archaeology and Historic Preservation guidance on inadvertent discoveries

Together these authorities emphasize informed decision-making, cumulative impact analysis, mitigation, protection of critical areas, and conservation of environmental quality.

## VII. Conclusion

The Snohomish Tribe of Indians respectfully requests that the co-lead agencies revise the MDNS to include stronger environmental protections before issuing a final determination. Additional mitigation should include protection of mature trees, restoration with native vegetation, wildlife corridor enhancement, comprehensive monitoring, adaptive management, expanded cultural resource protections, and stronger protection of water resources.

The Snohomish people have long understood that environmental health cannot be separated into individual components. Protecting salmon requires protecting rivers; protecting rivers requires protecting forests; protecting forests requires protecting soils, wildlife, and native plants. This holistic understanding has guided our people for generations and remains directly relevant to environmental decision-making today.

Thank you for considering these comments and for your continued commitment to protecting Washington's environmental resources for present and future generations.

Adam Dallman  
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Snohomish Tribal Council  
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