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February 5, 2012

VIA ELECTRONIC FILING

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission (FERC)
888 First Street NE
Washington, DC 20426

**Re: Jackson Hydro Project (FERC No. 2157)
Instream Flow Modification in Reach 3 of the Sultan River**

Dear Secretary Bose:

The Public Utility District No. 1 of Snohomish County (District) will be modifying the instream flow schedule for the Jackson Hydroelectric Project (Project) in Reach 3 of the Sultan River during the course of this water year (present – June 30, 2012); see Attachment: 2012 Instream Flow Schedule. This modification is consistent with the requirements identified under “A-LA 9: Minimum Flows” in Exhibit G of the Project’s License.

The purpose of this change is to provide warmer water during key resident trout spawning and rearing periods in Reach 3 of the Sultan River (the reach between river mile 9.7 and 16.1), as compared to the default flow scheduled identified in A-LA 9. The change will involve re-shaping of the flow release schedule but result in no net change to the annual flow budget. This will balance physical habitat and temperature requirements (see Attachment 2: Reach 3 Flow and Temperature Data). By maximizing releases through the auxiliary line during the stratification period and carefully managing cool water releases, rainbow trout will benefit by:

- Earlier Initiation of spawning,
- Shorter incubation time,
- Exposure to longer and warmer growing conditions, and
- Being in a better position to overwinter.

The District consulted with the Aquatic Resources Committee over the last several months regarding the benefits of the modified flow schedule – no members objected to the modification (see Attachment 3: Consultation Documentation). As such, the District is implementing this modified flow schedule for Reach 3 effective immediately.

Please contact me at the number below, or Keith Binkley (Natural Resources Manager, fish biologist) at (425) 783-1769, if you should have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Kim D. Moore', written in a cursive style.

Kim D. Moore, P.E.
Assistant General Manager of Generation, Water and Corporate Services
(425) 783-8606
KDMoore@snopud.com

cc: Keith Binkley, District
Aquatic Resources Committee Members

ATTACHMENT 1:
Modified 2012 Instream Flow Schedule for Reach 3

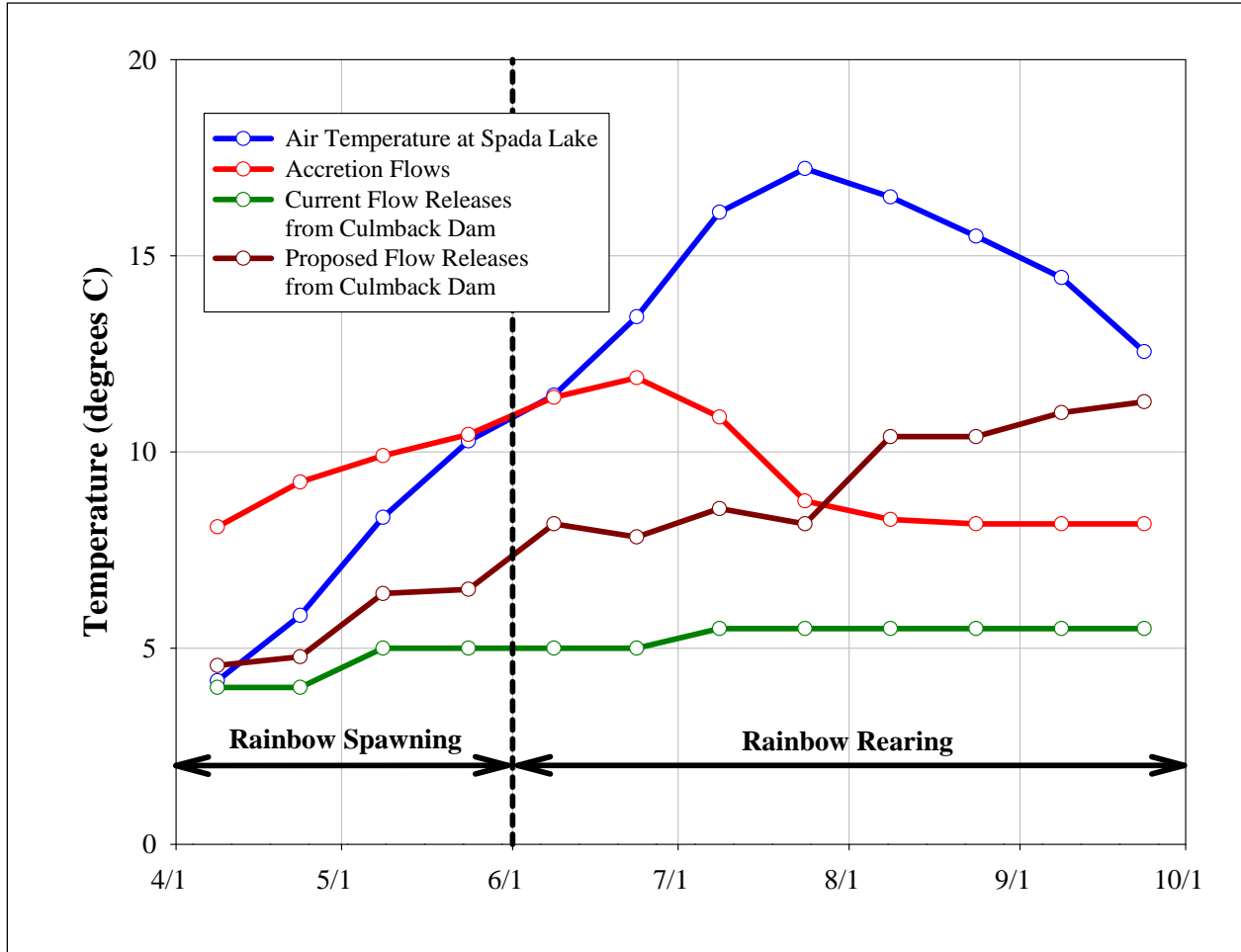
Timeframe	Release Flow (cfs)
January	21
February	21
March	21
April 1-15	31
April 16-30	25
May 1-15	30
May 16-31	29
June 1-15	23
June 16-30	28

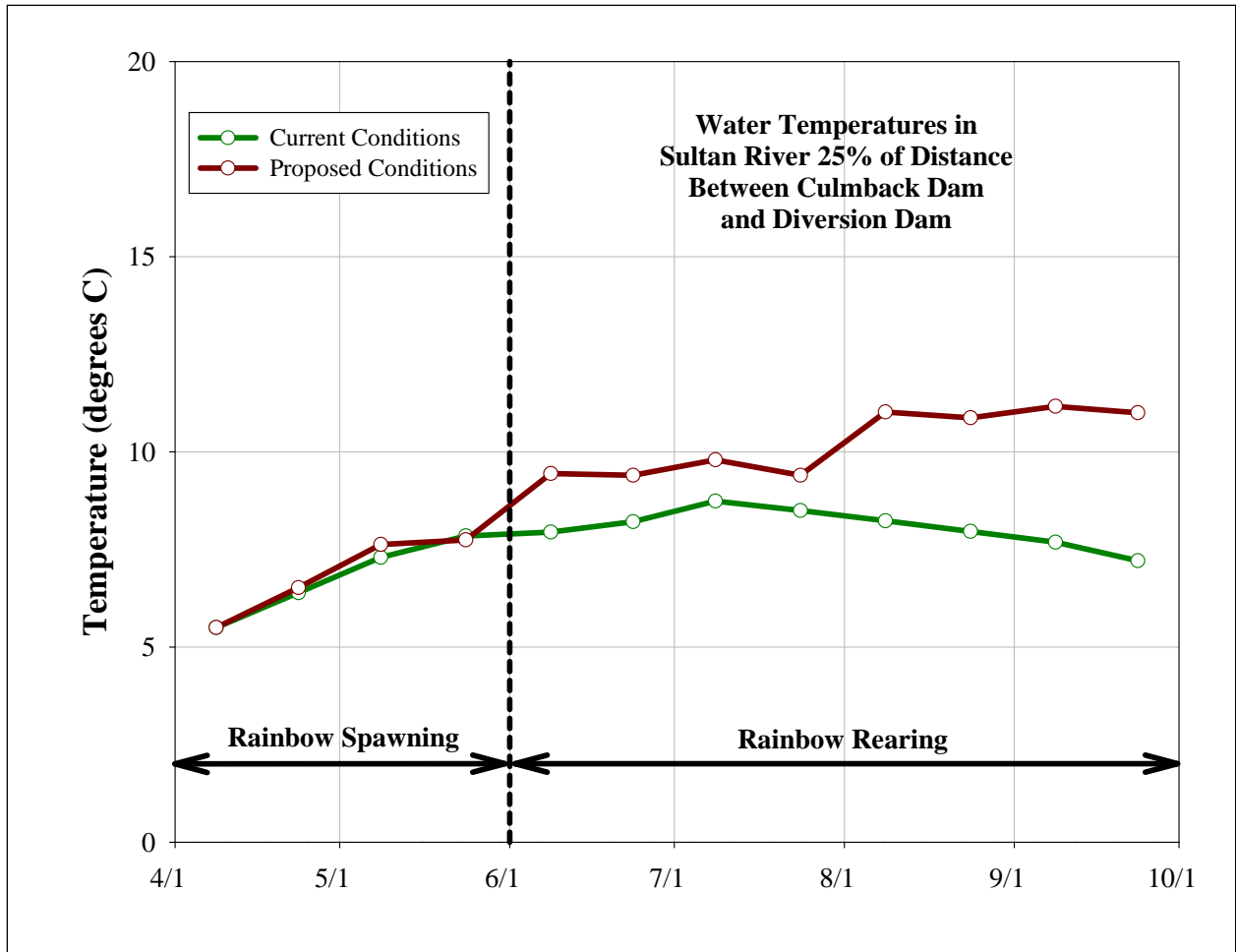
July 1*-15	37
July 16-31	42
August 1-15	44
August 16-31	44
September 1-15	43
September 16-30	41
October	21
November	21
December	21

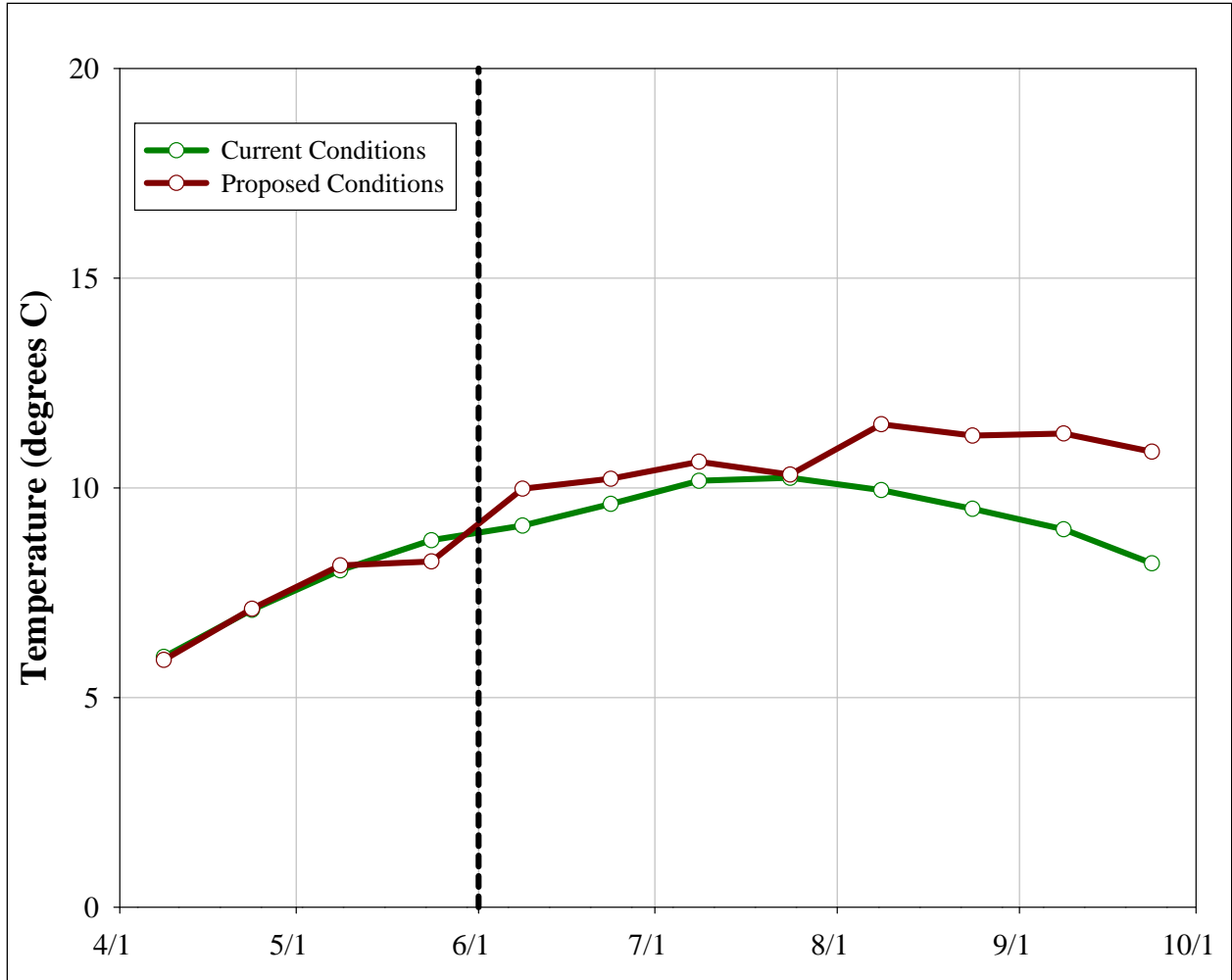
* July 1 begins the next water year.

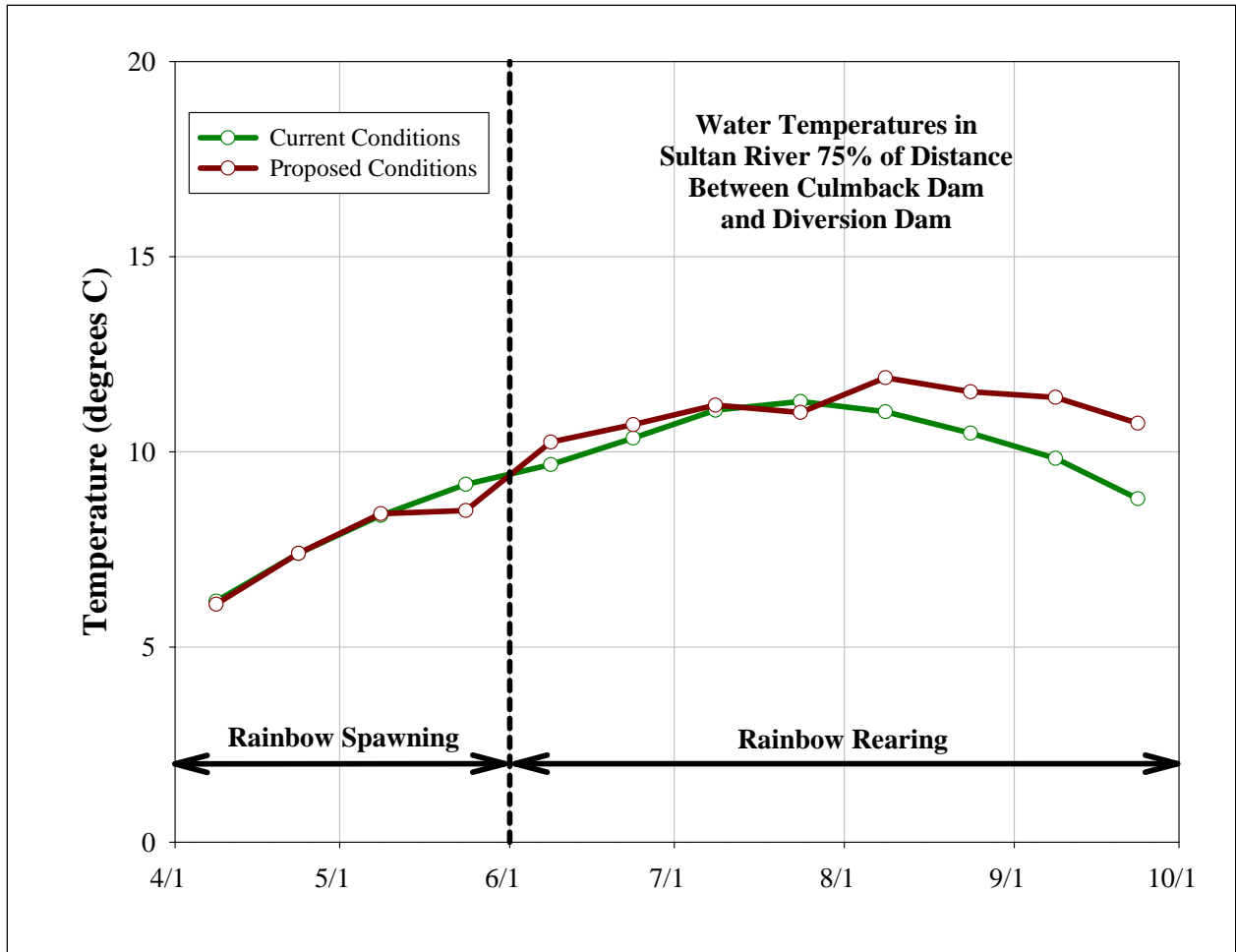
This flow schedule will continue between water years.

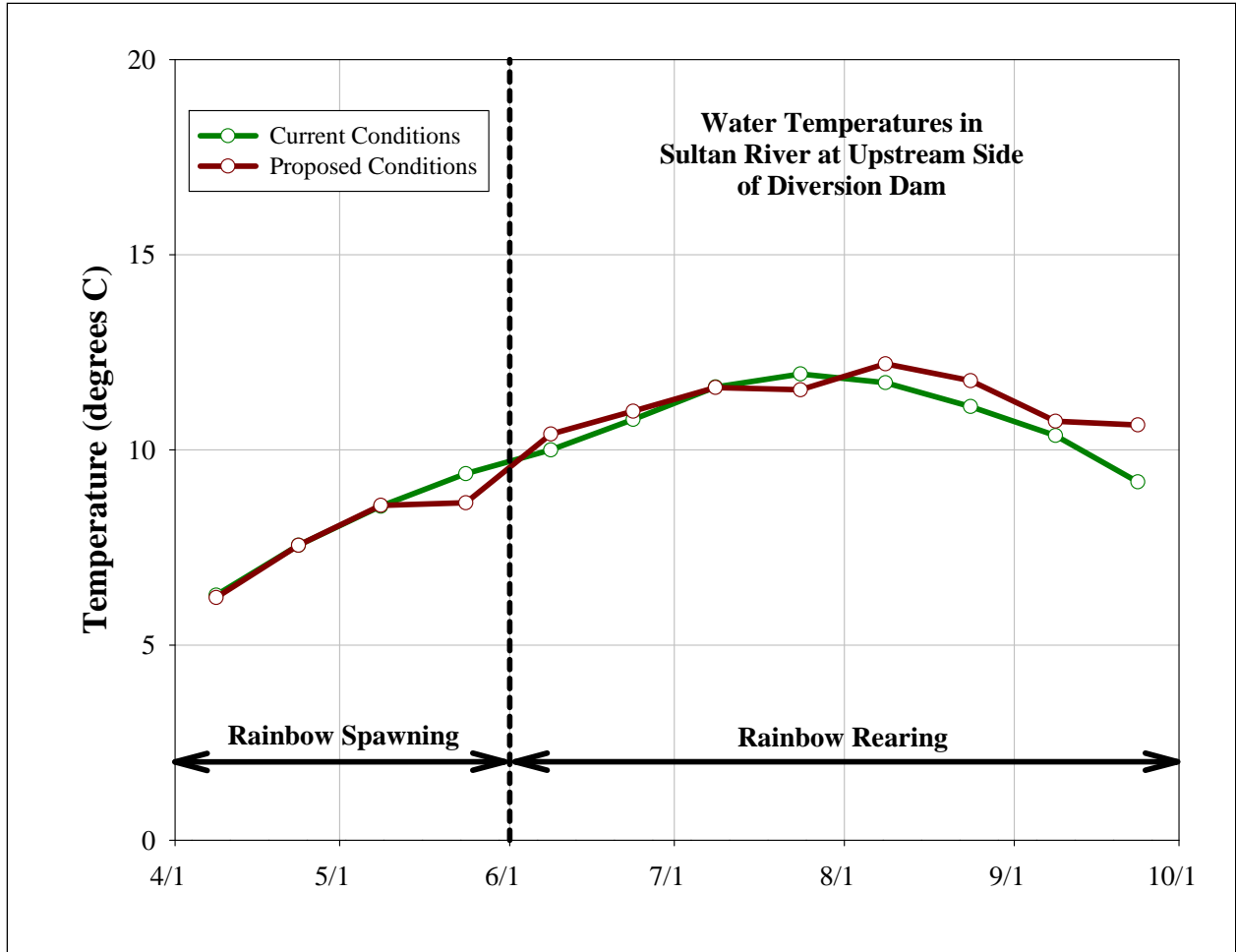
ATTACHMENT 2: Reach 3 Flow and Temperature Data

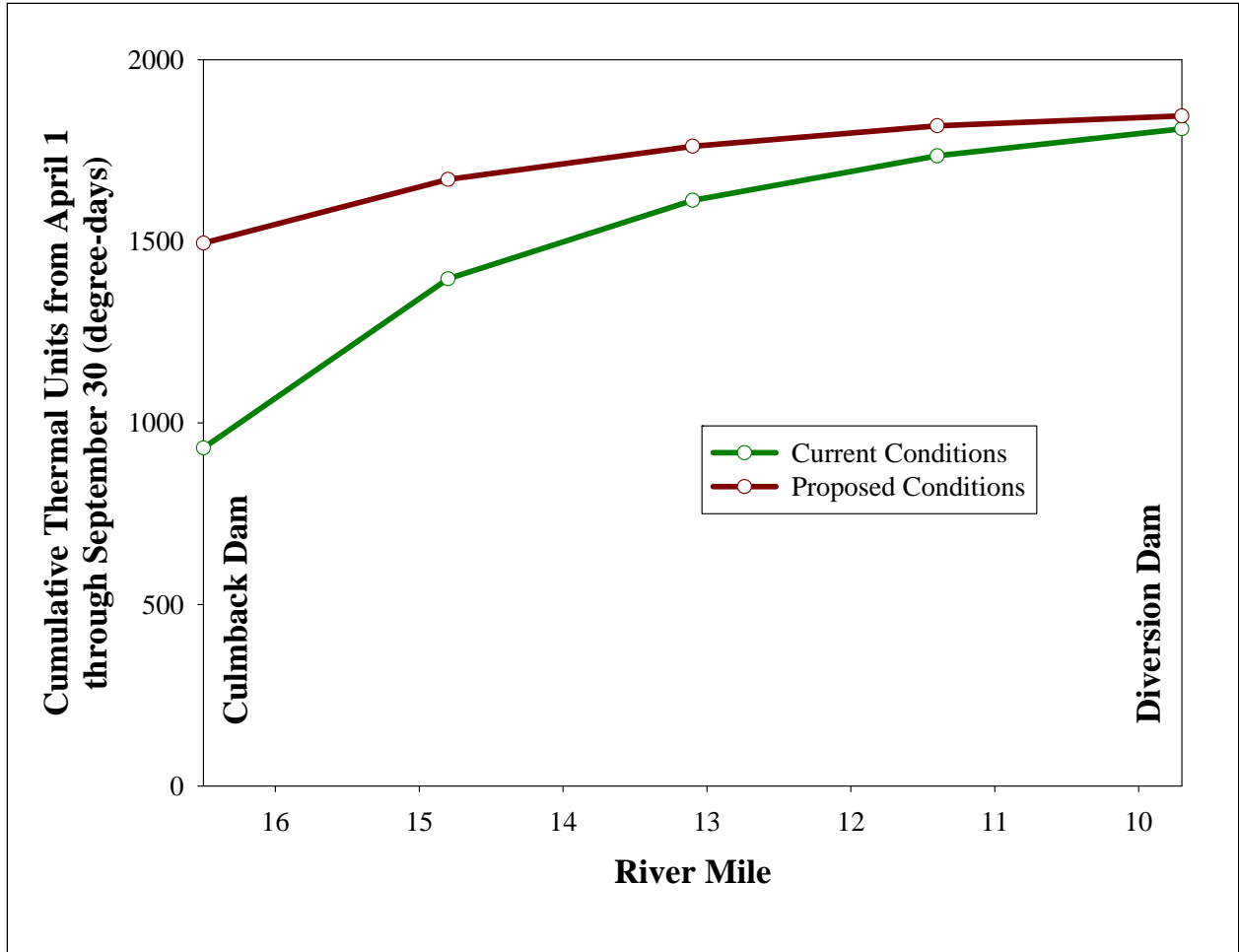












ATTACHMENT 3:
Consultation Documentation

Presler, Dawn

From: Binkley, Keith
Sent: Wednesday, February 01, 2012 5:39 PM
To: Presler, Dawn; 'Okeefe@americanwhitewater.org'; 'Jim Miller - Everett'; 'Deborah Knight - Sultan'; 'Steven.M.Fransen@noaa.gov'; 'Frank Leonetti - SnoCo'; 'Abby Hook'; 'Tim_Romanski@fws.gov'; 'Loren Everest - USFS'; 'cmay461@ecy.wa.gov'; 'Brock.Applegate@dfw.wa.gov'
Subject: Reach 3 - Alternate Flow Regime

Thanks to those of you who weighed in and participated in the discussions regarding the alternate flow regime for Reach 3. At this point, I have either emailed or chatted with most of the biologists interested in this topic. With your concurrence, I am proposing to adopt the alternate flow regime for this first year of the new license. This will balance physical habitat and temperature requirements. By maximizing releases through the auxiliary line during the stratification period and carefully managing cool water releases, rainbow trout will benefit by:

- Earlier Initiation of spawning,
- Shorter incubation time,
- Exposure to longer and warmer growing conditions, and
- Being in a better position to overwinter.

Please respond to reaffirm your support for this decision. Also, feel free to notify me if you have objections.

Thanks

Keith

Presler, Dawn

From: Maynard, Chris (ECY) [cmay461@ECY.WA.GOV]
Sent: Thursday, February 02, 2012 9:32 AM
To: Binkley, Keith
Cc: Presler, Dawn; 'Okeefe@americanwhitewater.org'; Applegate, Brock A (DFW); 'Loren Everest - USFS'; 'Tim_Romanski@fws.gov'; 'Abby Hook'; 'Frank Leonetti - SnoCo'; 'Steven.M.Fransen@noaa.gov'; 'Deborah Knight - Sultan'; 'Jim Miller - Everett'
Subject: RE: Reach 3 - Alternate Flow Regime

Keith

Ecology supports the adjustments you suggest to provide warmer water for trout spawning and rearing in 2012 in Reach 3.

Chris

Chris Maynard | Hydropower & Instream Flows | Water Resources | WA Department of Ecology | 360.407.6641 cmay461@ecy.wa.gov

From: Binkley, Keith [<mailto:KMBinkley@SNOPUD.com>]
Sent: Wednesday, February 01, 2012 5:39 PM
To: Presler, Dawn; 'Okeefe@americanwhitewater.org'; 'Jim Miller - Everett'; 'Deborah Knight - Sultan'; 'Steven.M.Fransen@noaa.gov'; 'Frank Leonetti - SnoCo'; 'Abby Hook'; 'Tim_Romanski@fws.gov'; 'Loren Everest - USFS'; Maynard, Chris (ECY); Applegate, Brock A (DFW)
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Thanks

Keith

Presler, Dawn

From: Steven Fransen [steven.m.fransen@noaa.gov]
Sent: Thursday, February 02, 2012 4:15 PM
To: Tim_Romanski@fws.gov
Cc: Binkley, Keith; Abby Hook; Brock.Applegate@dfw.wa.gov; cmay461@ecy.wa.gov; Deborah Knight - Sultan; Presler, Dawn; Frank Leonetti - SnoCo; Jim Miller - Everett; Loren Everest - USFS; Okeefe@americanwhitewater.org
Subject: Re: Reach 3 - Alternate Flow Regime

Same here Keith.

SF

On Thu, Feb 2, 2012 at 3:41 PM, <Tim_Romanski@fws.gov> wrote:

I am OK with this approach.

Tim Romanski
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Washington Fish and Wildlife Office
Division of Conservation and Hydropower Planning
510 Desmond Drive SE, Lacey, WA 98503
[360.753.5823](tel:360.753.5823) (phone) [360.753.9518](tel:360.753.9518) (fax)

"Binkley, Keith" <KMBinkley@SNOPUD.com>

02/01/2012 06:57 PM

To "Presler, Dawn" <DJPresler@SNOPUD.com>, "Okeefe@americanwhitewater.org" <Okeefe@americanwhitewater.org>, "Jim Miller - Everett" <jmiller@ci.everett.wa.us>, "Deborah Knight - Sultan" <deborah.knight@ci.sultan.wa.us>, "Steven.M.Fransen@noaa.gov" <Steven.M.Fransen@noaa.gov>, "Frank Leonetti - SnoCo" <frank.leonetti@sno.co.org>, "Abby Hook" <ahook@tulaliptribes-nsn.gov>, "Tim_Romanski@fws.gov" <Tim_Romanski@fws.gov>, "Loren Everest - USFS" <leverest@fs.fed.us>, "cmay461@ecy.wa.gov" <cmay461@ecy.wa.gov>, "Brock.Applegate@dfw.wa.gov" <Brock.Applegate@dfw.wa.gov>

cc

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- Shorter incubation time,

- ☐☐☐☐ Exposure to longer and warmer growing conditions, and
- ☐☐☐☐ Being in a better position to overwinter.

Please respond to reaffirm your support for this decision. Also, feel free to notify me if you have objections.

Thanks

Keith

Presler, Dawn

From: Binkley, Keith
Sent: Thursday, February 02, 2012 4:48 PM
To: 'Leonetti, Frank'; Presler, Dawn; 'Okeefe@americanwhitewater.org'; 'Jim Miller - Everett'; 'Deborah Knight - Sultan'; 'Steven.M.Fransen@noaa.gov'; 'Abby Hook'; 'Tim_Romanski@fws.gov'; 'Loren Everest - USFS'; 'cmay461@ecy.wa.gov'; 'Brock.Applegate@dfw.wa.gov'
Subject: RE: Reach 3 - Alternate Flow Regime

Frank – we have great coverage with temperature probes at 1.5 mile intervals through the reach. I will work to document spawning in the field. Our monitoring program include collection of scales so we can get some growth information as well.

Thanks everyone

Keith

From: Leonetti, Frank [<mailto:frank.leonetti@snoco.org>]
Sent: Thursday, February 02, 2012 4:31 PM
To: Binkley, Keith; Presler, Dawn; 'Okeefe@americanwhitewater.org'; 'Jim Miller - Everett'; 'Deborah Knight - Sultan'; 'Steven.M.Fransen@noaa.gov'; 'Abby Hook'; 'Tim_Romanski@fws.gov'; 'Loren Everest - USFS'; 'cmay461@ecy.wa.gov'; 'Brock.Applegate@dfw.wa.gov'
Subject: RE: Reach 3 - Alternate Flow Regime

Keith – it makes sense, and I support. Were you planning to implement any monitoring to evaluate/confirm whether spawning was earlier, incubation time was shorter (use thermal units), and growth was improved? I don't recall if I'd find such a proposal in any earlier documents regarding the rainbow population, prior to my participation in the re-licensing technical process. Thanks - Frank

From: Binkley, Keith [<mailto:KMBinkley@SNOPUD.com>]
Sent: Wednesday, February 01, 2012 5:39 PM
To: Presler, Dawn; 'Okeefe@americanwhitewater.org'; 'Jim Miller - Everett'; 'Deborah Knight - Sultan'; 'Steven.M.Fransen@noaa.gov'; Leonetti, Frank; 'Abby Hook'; 'Tim_Romanski@fws.gov'; 'Loren Everest - USFS'; 'cmay461@ecy.wa.gov'; 'Brock.Applegate@dfw.wa.gov'
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Please respond to reaffirm your support for this decision. Also, feel free to notify me if you have objections.

Thanks

Presler, Dawn

From: Abby Hook [ahook@tulaliptribes-nsn.gov]
Sent: Thursday, February 02, 2012 3:55 PM
To: Binkley, Keith; Presler, Dawn; Okeefe@americanwhitewater.org; Jim Miller - Everett; Deborah Knight - Sultan; Steven.M.Fransen@noaa.gov; Frank Leonetti - SnoCo; Tim_Romanski@fws.gov; Loren Everest - USFS; cmay461@ecy.wa.gov; Brock.Applegate@dfw.wa.gov
Subject: RE: Reach 3 - Alternate Flow Regime

We support the change. Thanks, Keith.

Abby Hook
Hydrologist
6406 Marine Dr
Tulalip, WA 98271
(360) 716-4636 (desk)

From: Binkley, Keith [<mailto:KMBinkley@SNOPUD.com>]
Sent: Wed 2/1/2012 5:39 PM
To: Presler, Dawn; 'Okeefe@americanwhitewater.org'; 'Jim Miller - Everett'; 'Deborah Knight - Sultan'; 'Steven.M.Fransen@noaa.gov'; 'Frank Leonetti - SnoCo'; Abby Hook; 'Tim_Romanski@fws.gov'; 'Loren Everest - USFS'; 'cmay461@ecy.wa.gov'; 'Brock.Applegate@dfw.wa.gov'
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Thanks

Keith

Presler, Dawn

From: Tim_Romanski@fws.gov
Sent: Thursday, February 02, 2012 3:42 PM
To: Binkley, Keith
Cc: 'Abby Hook'; 'Brock.Applegate@dfw.wa.gov'; 'cmay461@ecy.wa.gov'; 'Deborah Knight - Sultan'; Presler, Dawn; 'Frank Leonetti - SnoCo'; 'Jim Miller - Everett'; 'Loren Everest - USFS'; 'Okeefe@americanwhitewater.org'; 'Steven.M.Fransen@noaa.gov'
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Tim Romanski
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
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Division of Conservation and Hydropower Planning
510 Desmond Drive SE, Lacey, WA 98503
360.753.5823 (phone) 360.753.9518 (fax)

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