



Your Northwest renewables utility

January 20, 2016

VIA ELECTRONIC FILING

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

**Re: Calligan Creek Hydroelectric Project, FERC No. 13948
License Article 407: Terrestrial Resources Management Plan
Noxious Weed Management on Project Lands
Request for Non-Capacity License Amendment**

Dear Secretary Bose:

Public Utility District No. 1 of Snohomish County (the District) was issued an original license for the Calligan Creek Hydroelectric Project (Project) on June 23, 2015 (License).¹ With this letter, the District requests an amendment to the Terrestrial Resources Management Plan (TRMP), dated February 25, 2014, and approved with modifications in License Article 407.

Exhibit G of the Project License, approved with revisions on November 10, 2015,² defines the Project Boundary. License Article 203 required the District to modify the Project Boundary in Exhibit G to incorporate 10.53 acres of preservation areas located on four parcels of land near the diversion and intake structures, and all private roads necessary to provide unrestricted access from publically owned and maintained roads to the Project facilities. The District considers the intent of the requirement to include private roads in the Project Boundary to be demonstration of access to Project facilities, and not definition of management areas. As such, the District requests a modification to the TRMP to include a clarification of areas to be monitored and managed for noxious weeds (Project lands).

The TRMP directs the management of terrestrial mitigation on Project lands for the term of the Project License. Section 2.3.1 describes management methods and treatment for previously identified and newly observed noxious weed sites on Project lands. However, "Project lands" was not defined in the TRMP. During the Project transition meeting held on October 13, 2015, Commission staff indicated that their interpretation of "Project lands" would include all roads within the Project Boundary, and the District would be required by the License to manage noxious weeds on all roads and road beds within this area. This was not the intent of the District when developing the TRMP. The District intended to manage noxious weeds on lands that the

¹ Order Issuing Original License. Public Utility District No. 1 of Snohomish County, Project No. 13948-002, 151 FERC ¶ 62,204 (2015).

² Order Approving Exhibit G Drawing. Public Utility District No. 1 of Snohomish County, Project No. 13948-006, 153 FERC ¶ 62,100 (2015).

District had exclusive impact on; and not on lands and roads that were of joint use and where impacts were caused by others. The additional private non-District roads that were requested to be included in the Project Boundary would be lightly used by the District for operation and maintenance of the Project. These roads are heavily used by Hancock Forest Management Group (HFMG) for harvesting on their lands, and also by authorized users of HFMG for public access and use. As such, management of these roads for noxious weeds should not be borne by the District.

The District would like to add the following clarifying statement to the TRMP in Section 2.3.1.1:

“Project lands are defined as Project-specific lands and roads within the Project Boundary indicated in Figure 2-4 of the TRMP. This includes lands at the intake, penstock route, powerhouse, preservation areas, and Project-specific roads used by the District to access the intake structure and powerhouse.”

An additional figure (Figure 2-4, attached) will be added to the TRMP for further clarification of this term. The District is also including updated versions of Figures 1-2, 1-3, 2-1, 2-2, and 2-3 to replace those in the existing TRMP, reflecting the new Project Boundary per Article 203.

If you have any questions regarding this request, please contact Dawn Presler, Sr. Environmental Coordinator and licensing/compliance lead, at (425) 783-1709 or DJPresler@snopud.com.

Sincerely,

/s/ Giuseppe Fina

Giuseppe Fina
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Attachments

cc: Keith Binkley, District
Dawn Presler, District
Jessica Spahr, District

Attachments

New and Replacement TRMP Figures











