



Your Northwest renewables utility

December 7, 2016

VIA ELECTRONIC FILING

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

**Re: Jackson Hydroelectric Project, FERC No. 2157
Report on Adaptive Management
A-LA 15 Adaptive Management Plan**

Dear Secretary Bose:

Enclosed is Public Utility District No. 1 of Snohomish County's five-year Report on Adaptive Management for the Water Years 2011 – 2015 pursuant to Aquatic License Article 15 for the Jackson Hydroelectric Project. The draft report was provided to the Aquatic Resource Committee for a 30-day review and comment period; no comments were received.

If you have any questions on the report, please contact Keith Binkley, Natural Resources Manager, at (425) 783-1769 or KMBinkley@snopud.com.

Sincerely,

/s/ Tom DeBoer

Tom DeBoer
Assistant General Manager of Generation, Power, Rates and Transmission Management
TADeBoer@snopud.com
(425) 783-1825

Enclosed: RAM

cc: ARC
Keith Binkley, District

Henry M. Jackson Hydroelectric Project
(FERC No. 2157)

**Report on Adaptive Management:
5-Year Report for Water Years 2011-2015
(A-LA 15)**



Everett, WA

December 2016

Final – This document has been prepared for the District. It has been peer-reviewed by the District for accuracy and formatting based on information known at the time of its preparation and with that understanding is considered complete by the District. The document may be cited as:

Public Utility District No. 1 of Snohomish County (District). 2016. Report on Adaptive Management, 5-Year Report (A-LA 15) for the Henry M. Jackson Hydroelectric Project, FERC No. 2157. December 2016.

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
2.0	CONFLICTS DURING WATER YEARS 2011-2015.....	1
2.1	Reservoir Targets	1
2.2	Low Flow and Drought Years	2
3.0	AM PLAN RECOMMENDATIONS	2

APPENDICES

Appendix 1	Consultation Documentation Regarding Draft Report
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1.0 INTRODUCTION

Public Utility District No. 1 of Snohomish County (the District) received a license on September 2, 2011 (License), from the Federal Energy Regulatory Commission (FERC) for the Henry M. Jackson Hydroelectric Project (Project). License Ordering Paragraphs D (Washington Department of Ecology 401 Water Quality Certification conditions) and E (U.S. Forest Service section 4(e) conditions) require the District to implement Aquatic License Article 15: Adaptive Management Plan (A-LA 15) as detailed in License Appendix G. The District filed the Adaptive Management Plan (AM Plan) with the FERC on February 24, 2012, after approval from the Aquatic Resources Committee (ARC)¹; FERC approved the AM Plan on May 3, 2012.

The AM Plan identifies a structured process that the District and the other ARC members can follow to inform all the interested parties on the flexibility and limitations of Project operations over time as the District meets the obligations described in the License. The AM Plan also provides a process for determining and implementing temporary changes to operations as may become appropriate during the course of the License when abnormal conditions occur.

Pursuant to Section 5.2 of the AM Plan, the District is to file a report with the FERC by December 15 every 5 years identifying any conflicts in implementing the License, including any proposals for ongoing adaptive management. This Report on Adaptive Management (RAM), covering activities conducted from the date of license issuance in Water Year² (WY) 2011 through the completion of WY 2015 on June 30, 2016, was provided to the ARC for a 30-day period for review and comment. No comments were received from the ARC.

2.0 CONFLICTS DURING WATER YEARS 2011-2015

During the reporting period, conflicts fell into two categories: 1) those related to reservoir operations and 2) those related river flows and releases directly from the base of Culmback Dam. While the categories can be inter-related, as evidenced in 2015, this categorization helps focus on the rationale and objectives behind the actions taken.

2.1 Reservoir Targets

In September 2014, the District notified the ARC and submitted a letter to FERC notifying of the inability to meet the Spada Lake Reservoir target of not dropping below elevation 1,420 feet msl by September 15 to preserve a higher elevation level for reservoir fishing. This instance was permitted under License Article 406 which allows for adaptive management of reservoir elevation and temporary modification of targets based on emergency operations imposed on the District and major power plant outages in the Northwest Power Pool regional that are beyond the

¹ The ARC consists of representatives from the District, City of Everett, City of Sultan, Snohomish County, Washington Department of Ecology, Washington Department of Fish and Wildlife (WDFW), Tulalip Tribes, U.S. Forest Service, National Marine Fisheries Service, U.S. Fish and Wildlife Service, and American Whitewater.

² The District's Water Year originates on July 1 of the designated year and concludes on June 30 of the following year. For example, Water Year 2011 spans the period between July 1, 2011 and June 30, 2012.

control of the District. The District was able to resolve this conflict through the conditions outlined in License Article 406 and thereby able to meet its generation commitments while still providing opportunities for recreational fishing in the reservoir.

2.2 Low Flow and Drought Years

In September 2013 and July and September 2015, the District submitted letters to FERC notifying of the water use conflicts due to low flow/drought conditions.

In 2013, extended dry periods resulted in low inflows into the reservoir precipitating the District's inability to collectively meet seasonal reservoir target elevations (License Article 406), process flows (License Article 416), salmon ceiling (Aquatic License Article 5), and continued temperature conditioning in Reach 3 (License Article 415) requirements as outlined and scheduled in license articles. Through the process defined in the AM Plan and consultation with the ARC, resource experts were able to identify priority measures to adaptively manage water use in the Sultan River to maximize fish habitat benefits during the fall.

In 2015, the region weathered a drought. This necessitated using adaptive management to expedite the tiered, reservoir elevation driven schedule of minimum instream flow reductions under A-LA 9 to efficiently manage water to maintain habitat and water quality for fall spawning. With the persistence of the drought additional actions were required and invoked in September. Again through the AM Plan process and ARC consultation, and also the tiered approach of A-LA 9 and the drought provisions in the Process Flow Plan (License Article 416) and Whitewater Recreation Plan (License Article 412), the District was able to use real-time information to conservatively manage water and maintain fish habitat benefits while preserving the City of Everett's water supply needs; this was achieved by providing a modified process flow and whitewater recreational flow.

3.0 AM PLAN RECOMMENDATIONS

The District believes the current AM Plan process, including its required consultation with the ARC, has proven responsive to real-time water use conflicts and adaptive management; therefore, no recommendations for changes to the AM Plan are being made at this time.

Appendix 1

Consultation Documentation Regarding Draft Report

Presler, Dawn

From: Presler, Dawn
Sent: Monday, October 31, 2016 4:14 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Anne Savery'; 'Bryden, Andy -FS'; 'Elizabeth Babcock - NOAA Federal'; 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'Mick Matheson'; 'okeefe@americanwhitewater.org'; 'Jim Miller (JMiller@everettwa.gov)'; 'Rustay, Michael'
Cc: Binkley, Keith
Subject: JHP (FERC No. 2157) - AM Plan Report for your 30-day review
Attachments: 201611 DRAFT RAM Report.docx

Dear ARC Members:

Attached is the very brief, draft Adaptive Management Plan 5-Year Report identifying water use conflicts over the last five water years (July 2011 - June 2016) and our ability to adaptively manage based on the process identified in the AM Plan and consultation with the ARC. Please take the next 30 days to review and provide comments, if any, back to me (with a cc: to Keith) by November 30.

Please contact Keith if you have any questions.

Sincerely,
Dawn Presler
Sr. Environmental Coordinator
(425) 783-1709

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