



Your Northwest renewables utility

October 30, 2017

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
Operation Compliance Monitoring Plan Annual Report
License Article 407**

Dear Secretary Bose:

Enclosed is Public Utility District No. 1 of Snohomish County's Operation Compliance Monitoring Plan Annual Report for the Water Year July 2016 – June 2017 pursuant to License Article 407 for the Jackson Hydroelectric Project.

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: OCMP Annual Report

cc: ARC
Keith Binkley, District

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

Operation Compliance Monitoring Plan
(License Article 407)

**Annual Report for Water Year
July 2016 – June 2017**



Prepared By:



Everett, WA

October 2017

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). 2017. License Article 407: Operation Compliance Monitoring Plan Annual Report for Water Year July 2016 through June 2017, for the Henry M. Jackson Hydroelectric Project, FERC No. 2157. October 2017.

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Acronyms and Abbreviations

A-LA	Aquatic License Article
ARC	Aquatic Resource Committee
cfs	cubic feet per second
District	Public Utility District No. 1 of Snohomish County
FERC	Federal Energy Regulatory Commission
MW	megawatt
OCMP	Operation Compliance Monitoring Plan
PF Plan	Process Flow Plan
Project	Henry M. Jackson Hydroelectric Project, FERC No. 2157
RM	River Mile
SCADA	Supervisory Control and Data Acquisition
USGS	United States Geological Survey
WY	Water year

1. INTRODUCTION

Public Utility District No. 1 of Snohomish County (the District) received from the Federal Energy Regulatory Commission (FERC) a new license for the existing 111.8-megawatt (MW) Henry M. Jackson Hydroelectric Project (FERC No. 2157) (Project) on September 2, 2011. The District filed with the FERC the Operation Compliance Monitoring Plan (OCMP) in response to License Article 407. The FERC approved the OCMP on April 10, 2012. Per Section 9 of the OCMP, the District is to file an Annual Report by November 1 of each year, which documents the following for the previous water year (July through June):

- (a) the dates, duration, and quantities of the process flow released in accordance with the Process Flow Plan (PF Plan) required by Article 416;
- (b) Spada Lake Reservoir daily water surface elevations; and
- (c) if deviations from the targeted State 3 water surface elevations occurred, the reasons for the deviations and any proposals for corrective actions to avoid future occurrences, as appropriate.

This OCMP Annual Report covers activities for water year (WY) July 2016 – June 2017.

A copy of the draft report was provided to National Marine Fisheries Service, U.S. Forest Service, U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, Washington Department of Ecology, Tulalip Tribes, Snohomish County, City of Everett, City of Sultan, and American Whitewater (collectively known as the Aquatic Resource Committee or ARC) for a 30-day review and comment period.

Spada Lake Reservoir data in tabular format are included in Appendix 1. Letters regarding the deferral of fall 2016 process flows and reservoir elevation deviation are included as Appendix 2. Consultation documentation with the ARC regarding the draft report is included in Appendix 3; a response to Washington Department of Fish and Wildlife's comment is included in Appendix 4.

2. PROCESS FLOWS

The District provided process flow events pursuant to the Process Flow Plan (PF Plan) on two occasions during the July 2016 – June 2017 timeframe to serve multiple habitat benefits. These included, in chronological order: 1) a scheduled nighttime event in April 2017 for flushing surficial fine sediment from the streambed and to assist the outmigration of juvenile salmonids, and 2) a scheduled daytime event in May 2017 to assist the outmigration of juvenile salmonids. The District did not provide process flows during fall 2016 due to the construction of the Diversion Dam Volitional Passage project (Appendix 2). The three reaches of the Sultan River are depicted in Figure 1. The process flow events for the July 2016 – June 2017 timeframe are summarized, by these reaches, in Table 1. The District followed each process flow event with License-required downramping; downramping is evident on the descending limb of the hydrograph associated with each process flow event as shown in Figures 2 through 7. The full

Process Flow Log (dating back to September 2011) is posted to the web at:
<http://www.snopud.com/PowerSupply/hydro/jhp/jhplicense/fishery.ashx?p=2069>.

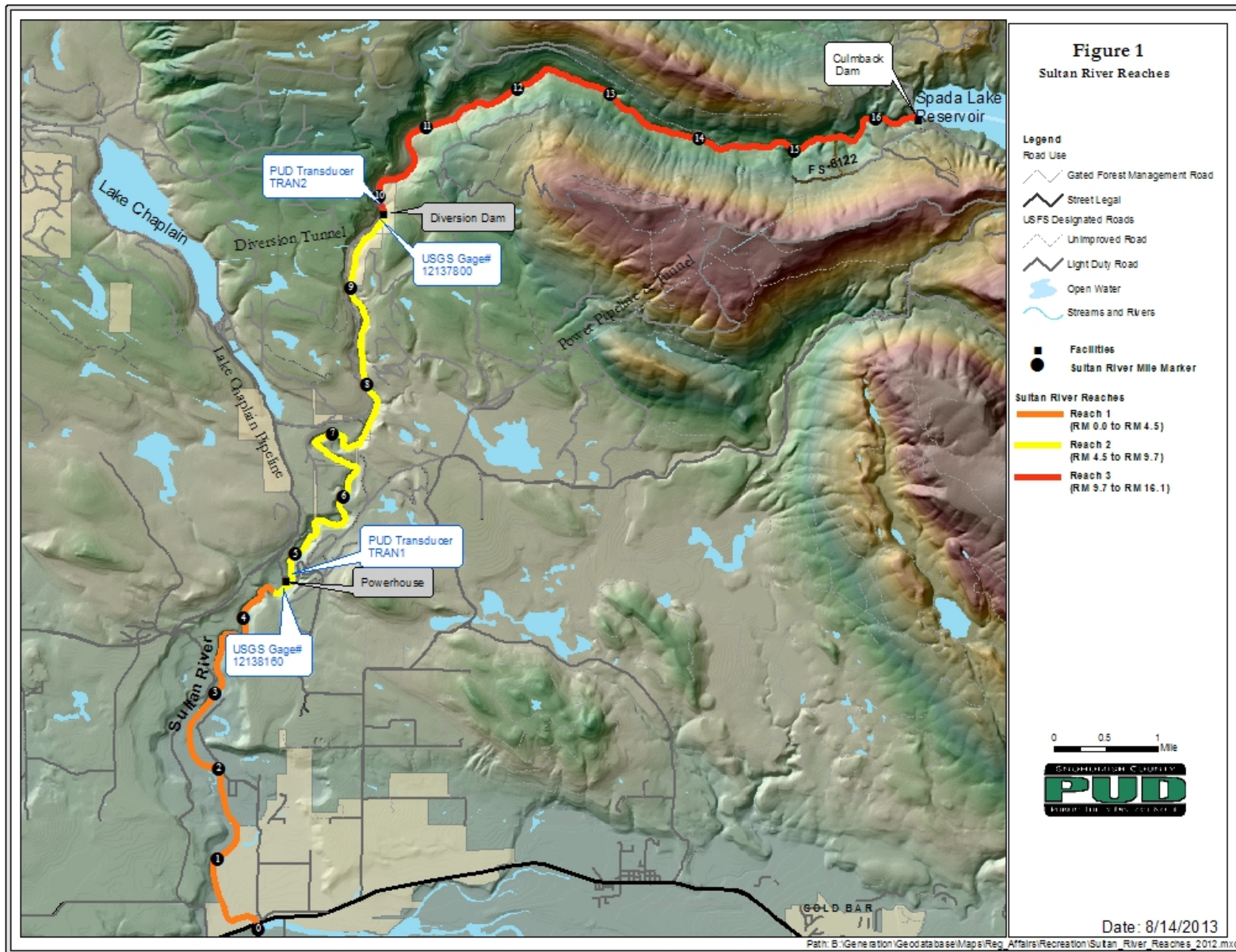


Figure 1. Sultan River reaches.

Table 1. Process Flow Log, July 2016 – June 2017.

Date ¹	Time ²	Magnitude ³ (cfs)	Duration ⁴ (hours)	Accretion ⁵ (cfs)	Notes ⁶	Counts as PF Type ⁷
4/13-14/17	21:30 to 09:00	R3 – 462 (average), range: 206 to 621	> 6 hours greater than 400 cfs	Estimated at 78 cfs	Reference Figure 2	FL, O
4/13-14/17	23:00 to 10:30	R2 – 712 (average), range: 430 to 1010	> 6 hours greater than 500 cfs	Estimated at 144 cfs	Reference Figure 3	FL, O
4/13-14/17	23:00 to 10:30	R1 – 1,940 (average), range: 1,610 to 2,150	> 6 hours greater than 1,500 cfs	Cumulative accretion estimated at 222	Reference Figure 4	FL, O
5/06/17	11:00 to 19:45	R3 – 691 (average), range: 217 to 1,010	> 6 hours greater than 200 cfs	Estimated at 118 cfs	Reference Figure 5	O
5/06/17	12:30 to 19:30	R2 – 851 (average), range: 434 to 1,070	> 6 hours greater than 400 cfs	Estimated at 160 cfs	Reference Figure 6	O
5/05-07/17	5/05/17 0:00 to 5/07/17 23:45	R1 – 1,137 (average), range: 832 to 2,070	> 6 hours greater than 800 cfs	Cumulative accretion estimated at 278	Reference Figure 7	O

¹ Start Date of Event (MM/DD/YYYY)² Start Time to End Time³ Magnitude of the Event for Each Compliance Location (R1-Reach 1, R2-Reach 2, R3-Reach 3)⁴ Duration of Event⁵ Portion of Event Attributed to Accretion Flows⁶ Notes of Day's Event, Sequencing with Other Flow Events/Maintenance⁷ Channel Forming (CF), Channel Maintenance (CM), Flushing (FL), Outmigration (O), Upmigration (U) as defined in the PF Plan

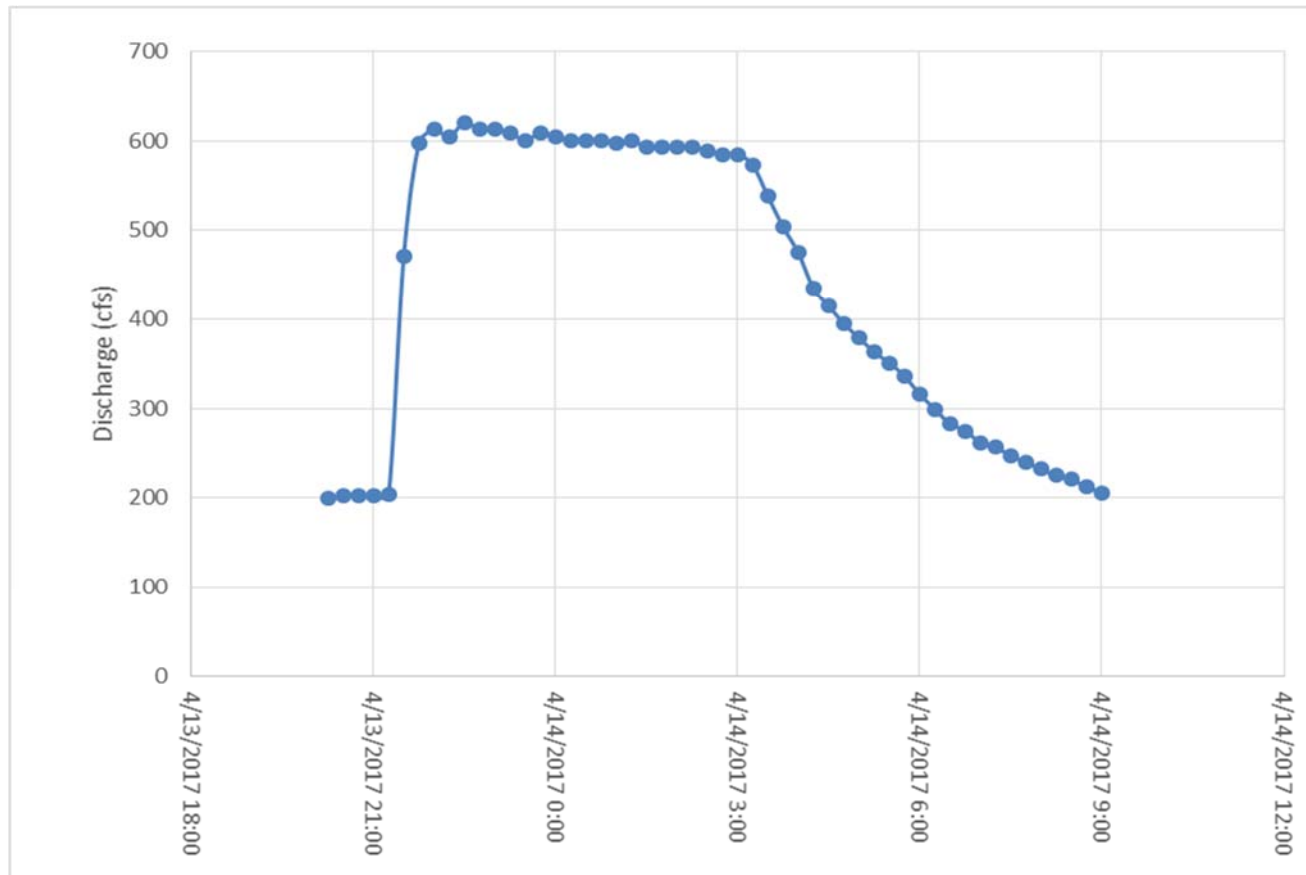


Figure 2. Reach 3 of the Sultan River immediately upstream of Diversion Dam RM 9.8 Outmigration and Flushing hydrograph – 4/13-14/2017.

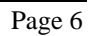


Figure 3. Reach 2 of the Sultan River immediately upstream of Powerhouse at RM 4.7 Outmigration and Flushing hydrograph – 4/13-14/2017.

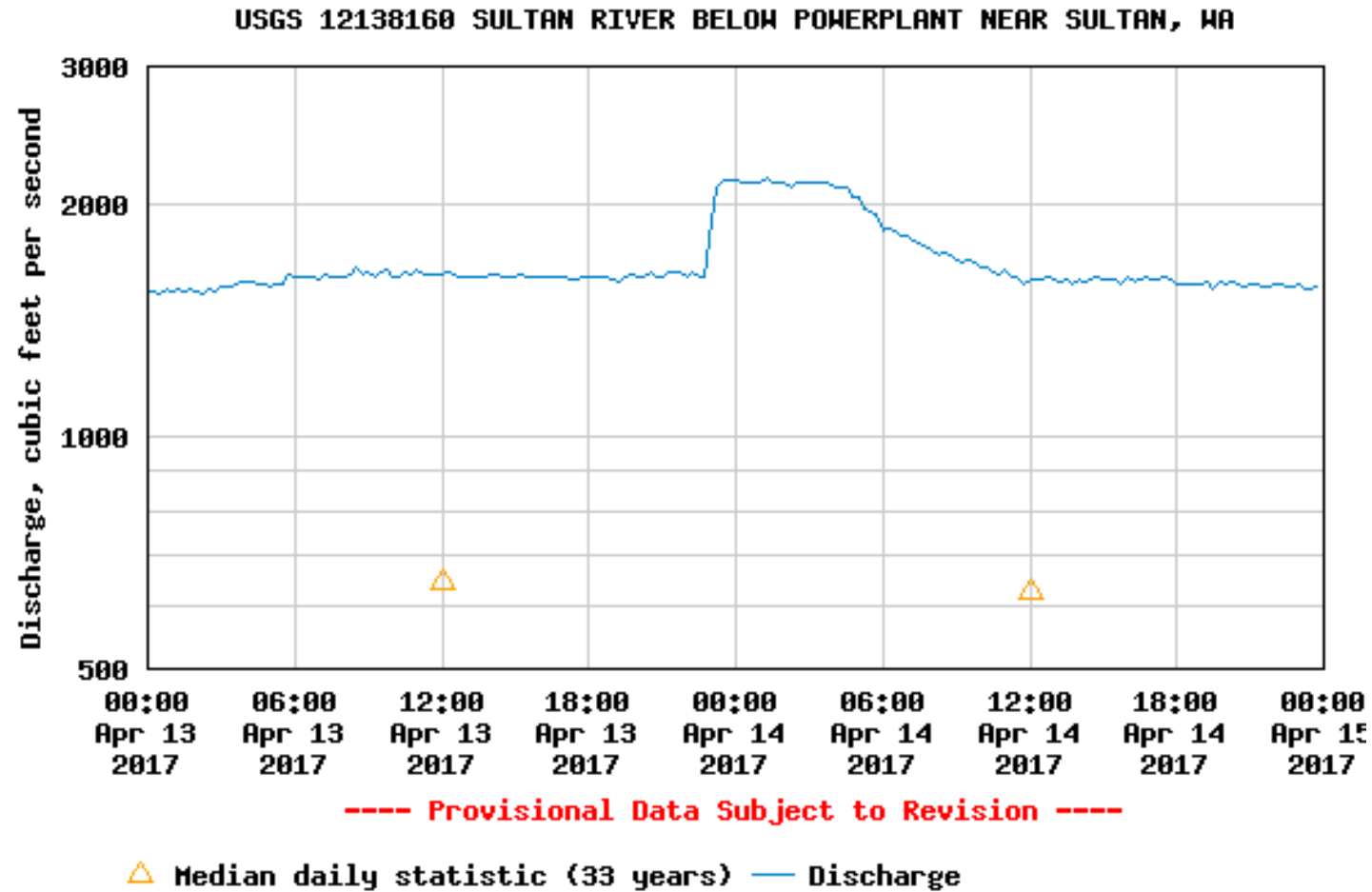


Figure 4. Reach 1 of the Sultan River below Powerplant Outmigration and Flushing hydrograph – 4/13-14/2017.

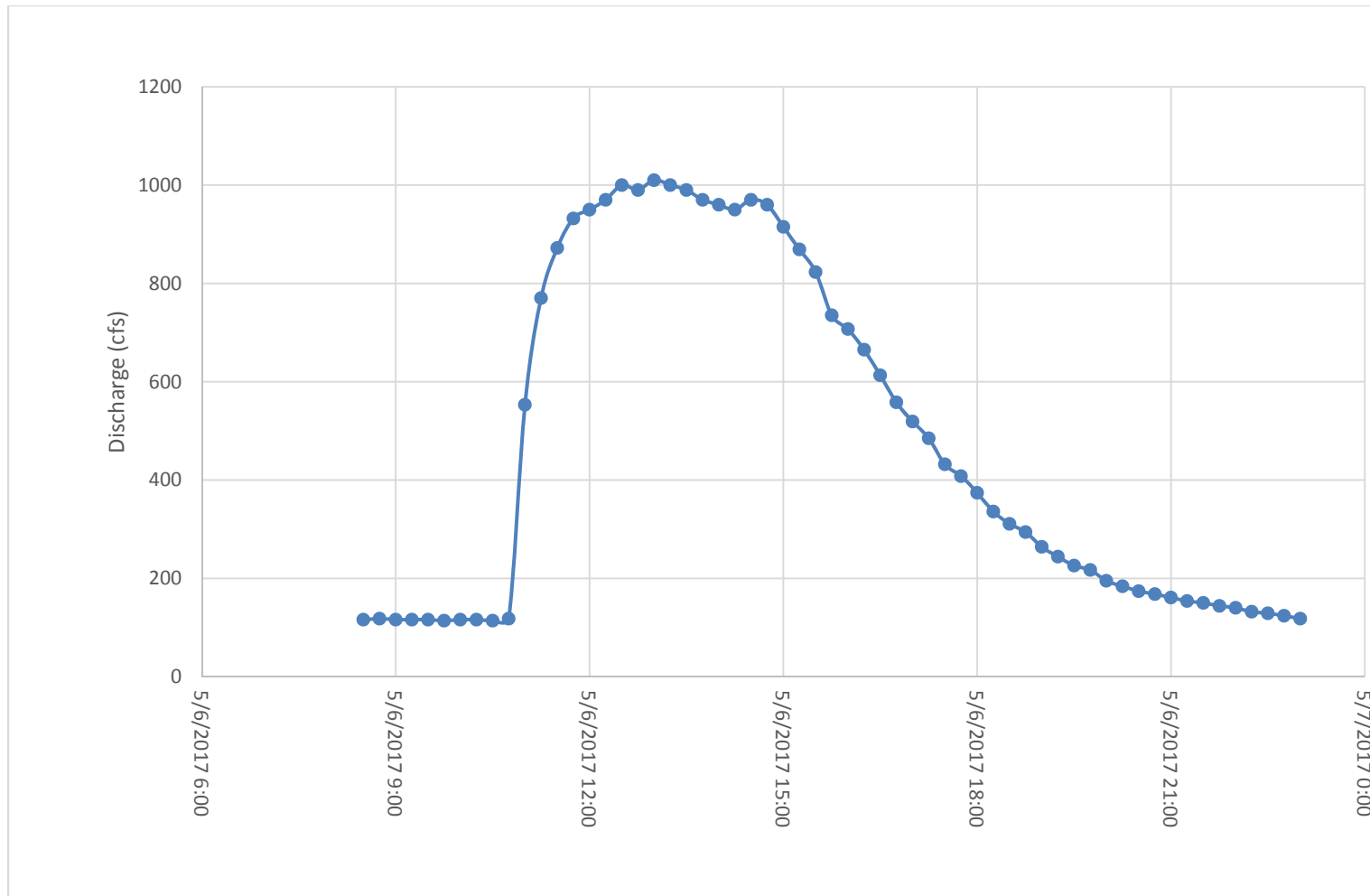


Figure 5. Reach 3 of the Sultan River immediately upstream of Diversion Dam RM 9.8 Outmigration hydrograph – 5/06/2017.

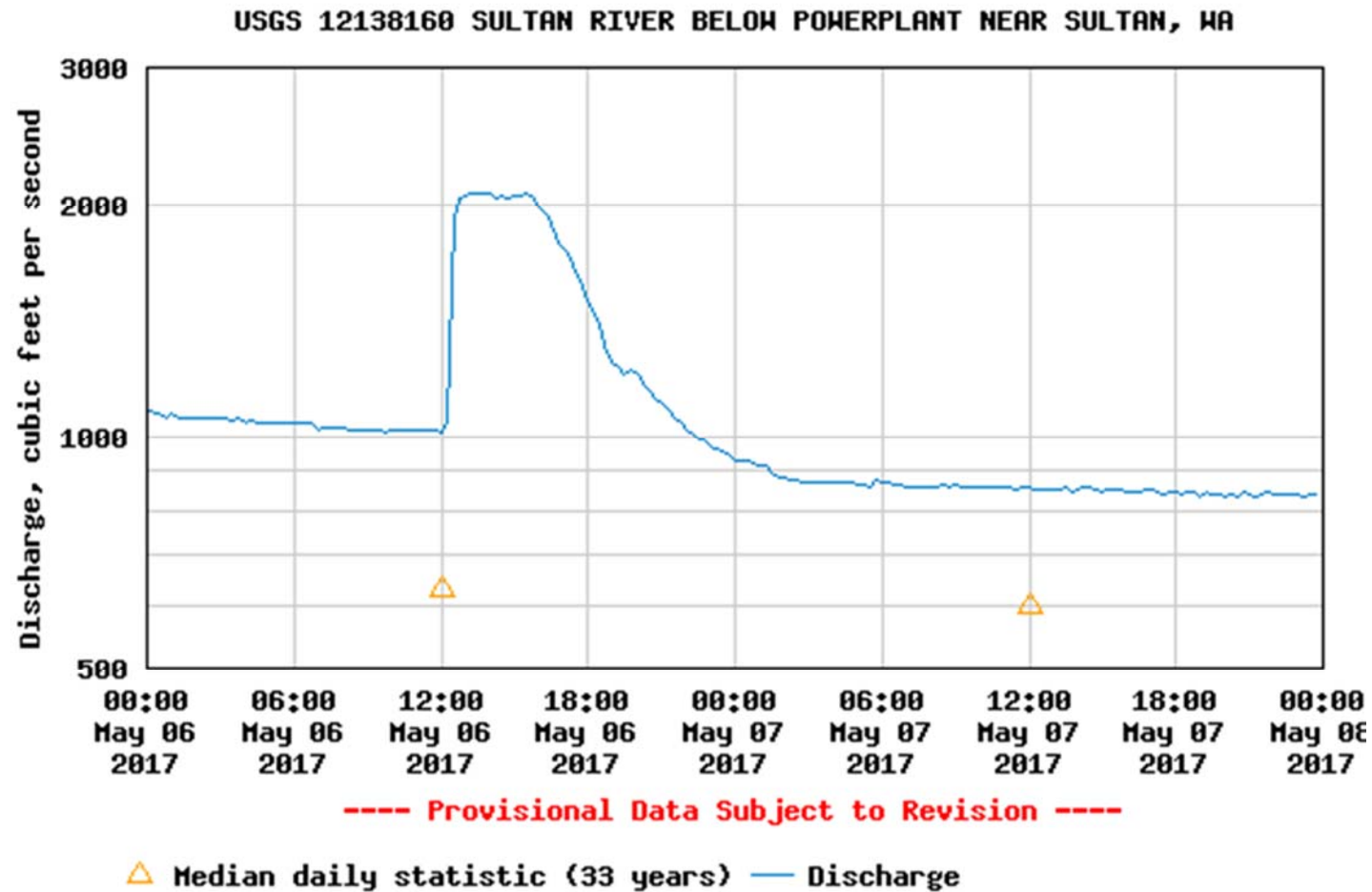


Figure 7. Reach 1 of the Sultan River immediately downstream of Powerhouse at RM 4.7 Outmigration hydrograph – 5/06/2017.

3. SPADA LAKE RESERVOIR WATER SURFACE ELEVATIONS

During this reporting period, Spada Lake Reservoir mean daily water surface elevations ranged between 1,409.9 and 1,447.4 feet msl, with the low on January 6, 2017, and the high on June 27, 2017. Figure 8 displays the mean daily water surface elevations of Spada Lake Reservoir, and Appendix 1 contains the data in tabular format.

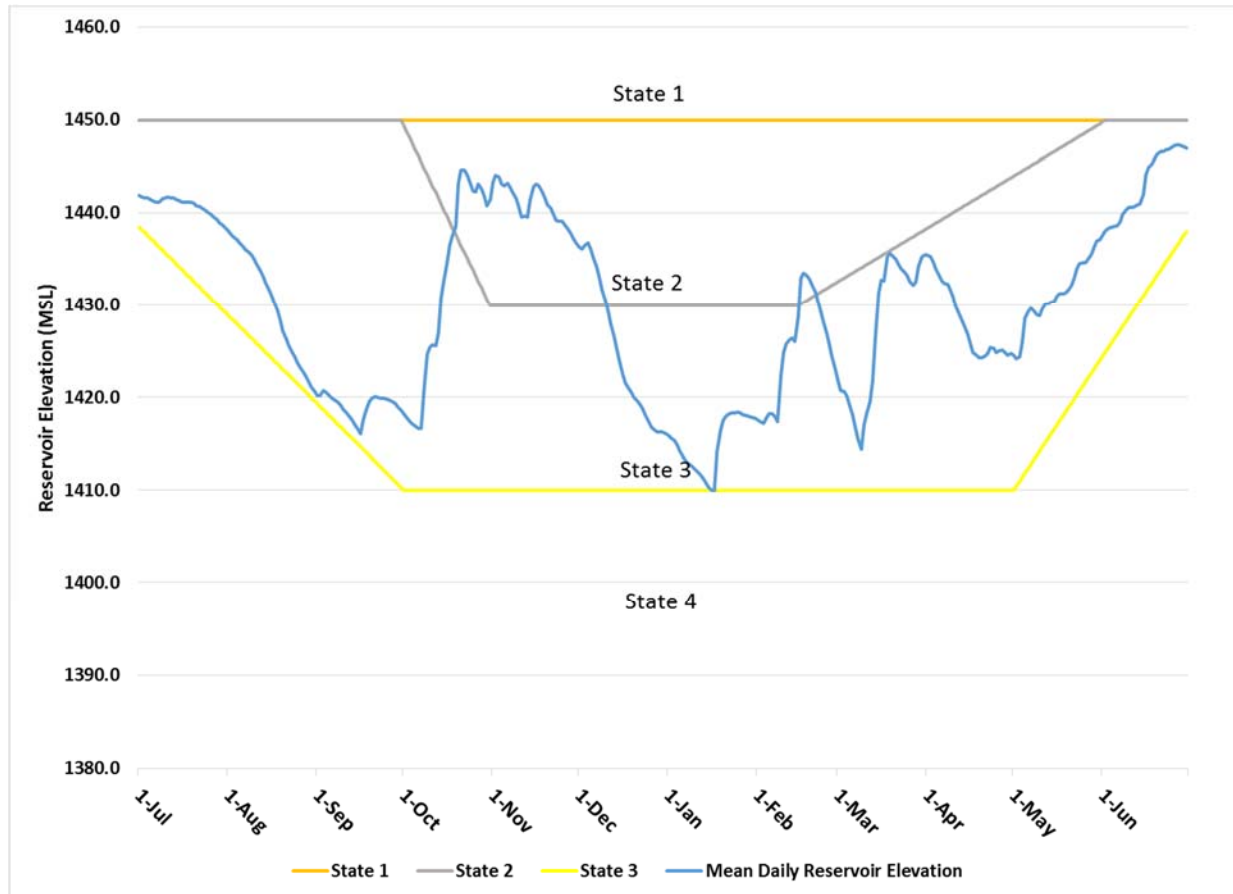


Figure 8. Mean daily water surface elevation, Spada Lake Reservoir, July 1, 2016 – June 30, 2017.

4. DEVIATIONS FROM STATE 3

License Article 406 requires:

When Spada Lake is in State 3, subject to meeting the (1) City of Everett's water supply requirements and other conditions of this license, the licensee shall maintain a minimum impoundment water surface elevation in Spada Lake above 1,430 feet mean sea level (msl), as measured at U.S. Geological Survey gage no. 12137300, Spada Lake near Startup, Washington, between July 1 and August 15. Until the temperature conditioning structure required by Appendix A, condition 5.2 (A-LA 3), and Appendix B, condition 2 (A-LA 3) is installed and operational (from license issuance until the earlier of (a) two years after the date the District completes the Sultan River diversion dam's volitional fish

passage modifications, described in A-LA 13 or (b) January 1, 2020), the licensee shall maintain a minimum impoundment water surface elevation in Spada Lake Reservoir at or above 1,420 feet msl from August 16 through September 15.⁸

In 2016, during the period of August 16 to September 15, the water surface in Spada Lake Reservoir went below the Project's License Article 406 target elevation of 1,420 feet msl. Specifically, at the end of day on September 6, 2016, the Spada Lake Reservoir had dropped below 1,420 feet msl and continued to decline to an elevation of 1,416.5 feet msl on September 15, 2016, the final day of the target elevation. License Article 406 states that the water surface elevation targets may be modified based on emergency operations imposed on the District, abnormal deviations in the power market, or major power plant outages in the Northwest Power Pool region that are beyond the control of the District.

During the month of August 2016, increased generation at the Project was utilized to compensate for a maximum flow limit below McNary Dam. This limit is imposed by Bonneville Power Administration (BPA) as part of the District's Slice generation contract and the Bi-Op requirements of the federal water management plan. Additional mitigating factors included a BPA imposed Grand Coulee Forebay minimum elevation target of 1,271.1 feet, and abnormally dry weather which severely limited Spada Lake reservoir inflows at the Project. In July and August 2016, mean monthly inflows to the reservoir were approximately 65% and 44% of the mean for those months. The 1,416.5 feet msl reservoir elevation level did not create any adverse environmental impacts, nor did it impact the usability of the boat ramp at the South Fork Recreation Site. The Aquatic Resource Committee was notified of this reservoir elevation event. In its letter dated January 9, 2017, FERC's Environmental and Project Review Branch of the Division of Hydropower Administration and Compliance stated that the deviation will not be considered as a violation of License Article 406.

⁸ *Public Utility District No. 1 of Snohomish County*, 137 FERC ¶ 61,221 (2011), Order Denying Rehearing And Granting Clarification, issued December 15, 2011.

Appendix 1

Spada Lake Reservoir Mean Daily Elevations Tabular Format

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
7/1	1441.95		8/1	1438.05		9/1	1420.14
7/2	1441.75		8/2	1437.71		9/2	1420.14
7/3	1441.68		8/3	1437.37		9/3	1420.69
7/4	1441.61		8/4	1437.16		9/4	1420.55
7/5	1441.47		8/5	1436.75		9/5	1420.28
7/6	1441.27		8/6	1436.41		9/6	1419.93
7/7	1441.13		8/7	1436.07		9/7	1419.66
7/8	1441.2		8/8	1435.86		9/8	1419.52
7/9	1441.54		8/9	1435.52		9/9	1419.18
7/10	1441.61		8/10	1435.04		9/10	1418.7
7/11	1441.75		8/11	1434.43		9/11	1418.43
7/12	1441.61		8/12	1433.81		9/12	1417.95
7/13	1441.68		8/13	1433.2		9/13	1417.54
7/14	1441.47		8/14	1432.51		9/14	1417.13
7/15	1441.34		8/15	1431.76		9/15	1416.51
7/16	1441.2		8/16	1431.08		9/16	1416.04
7/17	1441.13		8/17	1430.39		9/17	1417.54
7/18	1441.13		8/18	1429.44		9/18	1418.77
7/19	1441.2		8/19	1428.34		9/19	1419.52
7/20	1441.06		8/20	1427.18		9/20	1419.93
7/21	1440.79		8/21	1426.29		9/21	1420.07
7/22	1440.72		8/22	1425.61		9/22	1420
7/23	1440.51		8/23	1425.06		9/23	1419.93
7/24	1440.38		8/24	1424.38		9/24	1419.93
7/25	1440.1		8/25	1423.76		9/25	1419.8
7/26	1439.9		8/26	1423.22		9/26	1419.73
7/27	1439.56		8/27	1422.67		9/27	1419.52
7/28	1439.28		8/28	1422.19		9/28	1419.32
7/29	1438.94		8/29	1421.64		9/29	1418.98
7/30	1438.74		8/30	1421.1		9/30	1418.57
7/31	1438.39		8/31	1420.62			

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
10/1	1418.16		11/1	1443.32		12/1	1436.34
10/2	1417.81		11/2	1444.07		12/2	1436.14
10/3	1417.4		11/3	1443.93		12/3	1436.48
10/4	1417.13		11/4	1443.18		12/4	1436.75
10/5	1416.92		11/5	1442.98		12/5	1436.14
10/6	1416.65		11/6	1443.25		12/6	1435.18
10/7	1416.65		11/7	1442.77		12/7	1434.16
10/8	1420.48		11/8	1442.16		12/8	1433.06
10/9	1424.65		11/9	1441.54		12/9	1431.76
10/10	1425.4		11/10	1440.65		12/10	1430.53
10/11	1425.68		11/11	1439.63		12/11	1429.37
10/12	1425.54		11/12	1439.69		12/12	1428
10/13	1426.98		11/13	1439.56		12/13	1426.63
10/14	1430.81		11/14	1441.47		12/14	1425.34
10/15	1432.58		11/15	1442.84		12/15	1423.97
10/16	1434.63		11/16	1443.18		12/16	1422.53
10/17	1436.55		11/17	1442.91		12/17	1421.57
10/18	1437.51		11/18	1442.29		12/18	1421.07
10/19	1438.53		11/19	1441.61		12/19	1420.5
10/20	1443.25		11/20	1440.86		12/20	1420
10/21	1444.62		11/21	1440.51		12/21	1419.66
10/22	1444.62		11/22	1439.83		12/22	1419.25
10/23	1444.21		11/23	1439.22		12/23	1418.77
10/24	1443.39		11/24	1439.08		12/24	1418.09
10/25	1442.36		11/25	1439.08		12/25	1417.4
10/26	1442.29		11/26	1438.74		12/26	1416.79
10/27	1443.18		11/27	1438.33		12/27	1416.51
10/28	1442.57		11/28	1437.85		12/28	1416.24
10/29	1441.81		11/29	1437.23		12/29	1416.24
10/30	1440.79		11/30	1436.82		12/30	1416.24
10/31	1441.47					12/31	1416.04

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
1/1	1415.83		2/1	1417.54		3/1	1421.78
1/2	1415.56		2/2	1417.34		3/2	1420.75
1/3	1415.35		2/3	1417.2		3/3	1420.62
1/4	1414.87		2/4	1417.75		3/4	1420.14
1/5	1414.19		2/5	1418.16		3/5	1419.25
1/6	1413.57		2/6	1418.22		3/6	1418.02
1/7	1413.16		2/7	1417.88		3/7	1416.72
1/8	1412.89		2/8	1417.4		3/8	1415.49
1/9	1412.62		2/9	1422.39		3/9	1414.39
1/10	1412.34		2/10	1424.79		3/10	1416.99
1/11	1412		2/11	1425.75		3/11	1418.16
1/12	1411.73		2/12	1426.22		3/12	1419.52
1/13	1411.25		2/13	1426.43		3/13	1421.71
1/14	1410.84		2/14	1426.02		3/14	1426.36
1/15	1410.36		2/15	1428.75		3/15	1431.35
1/16	1409.95		2/16	1432.92		3/16	1432.79
1/17	1410.02		2/17	1433.54		3/17	1432.72
1/18	1414.12		2/18	1433.27		3/18	1435.25
1/19	1416.38		2/19	1432.86		3/19	1435.66
1/20	1417.47		2/20	1432.24		3/20	1435.39
1/21	1417.88		2/21	1431.42		3/21	1434.98
1/22	1418.16		2/22	1430.39		3/22	1434.5
1/23	1418.29		2/23	1429.3		3/23	1433.95
1/24	1418.29		2/24	1428.21		3/24	1433.61
1/25	1418.36		2/25	1426.91		3/25	1433.2
1/26	1418.29		2/26	1425.68		3/26	1432.58
1/27	1418.09		2/27	1424.38		3/27	1432.24
1/28	1418.02		2/28	1423.01		3/28	1432.58
1/29	1417.88					3/29	1434.22
1/30	1417.81					3/30	1435.32
1/31	1417.75					3/31	1435.52

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
4/1	1435.52		5/1	1424.51		6/1	1437.64
4/2	1435.32		5/2	1424.17		6/2	1438.05
4/3	1434.77		5/3	1424.38		6/3	1438.33
4/4	1433.95		5/4	1425.95		6/4	1438.46
4/5	1433.27		5/5	1428.55		6/5	1438.53
4/6	1432.65		5/6	1429.3		6/6	1438.67
4/7	1432.38		5/7	1429.71		6/7	1439.01
4/8	1432.31		5/8	1429.37		6/8	1439.83
4/9	1431.63		5/9	1428.96		6/9	1440.38
4/10	1430.87		5/10	1428.89		6/10	1440.58
4/11	1429.85		5/11	1429.57		6/11	1440.65
4/12	1429.03		5/12	1430.12		6/12	1440.72
4/13	1428.41		5/13	1430.19		6/13	1440.86
4/14	1427.73		5/14	1430.39		6/14	1440.99
4/15	1426.84		5/15	1430.46		6/15	1442.02
4/16	1425.75		5/16	1431.01		6/16	1444.21
4/17	1424.86		5/17	1431.28		6/17	1444.89
4/18	1424.51		5/18	1431.28		6/18	1445.3
4/19	1424.31		5/19	1431.35		6/19	1445.85
4/20	1424.31		5/20	1431.69		6/20	1446.33
4/21	1424.45		5/21	1432.24		6/21	1446.6
4/22	1424.72		5/22	1432.99		6/22	1446.6
4/23	1425.4		5/23	1434.02		6/23	1446.74
4/24	1425.27		5/24	1434.57		6/24	1446.87
4/25	1424.79		5/25	1434.63		6/25	1447.08
4/26	1425.06		5/26	1434.63		6/26	1447.22
4/27	1425.13		5/27	1435.04		6/27	1447.35
4/28	1424.79		5/28	1435.59		6/28	1447.22
4/29	1424.51		5/29	1436.34		6/29	1447.15
4/30	1424.72		5/30	1436.96		6/30	1447.01
			5/31	1437.16			

Appendix 2

Letters Regarding Process Flow Postponement and Reservoir Elevation Deviations

Presler, Dawn

From: Presler, Dawn
Sent: Tuesday, August 16, 2016 3:31 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; 'Anne Savery'; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith; Schneider, Eric
Subject: JHP - DDVP update - schedule, cofferdam, process flow

Dear ARC,

Please see email below from Keith providing you with an update on the DDVP project. Please provide comment, if any, to us within 10 business days so we can send a letter to FERC indicating as such. Failure to respond will be deemed as approval of the suspension of releases for September.

~Dawn

During the recent (July) conference call with the ARC, I mentioned that we would be provide them with a mid-August update on the DDVP project. This is that update. While we are making progress we are behind schedule largely due to challenges associated with water management at the site and specifically effectiveness of the cofferdam installation. The installation is stout but there is a fair amount of flow permeating through the gravel bar, beneath the coffer bags. The contractor has a workable solution and is working 6 days a week to catch up. With the importance of this project, the need to complete the project within one construction season, and the potential for risk to the coffer dam associated with high flow releases, the District is requesting a suspension of releases for Culmback Dam scheduled for the month of September. These releases include those for whitewater recreation, upstream migration, and channel flushing in reaches 2 and 3.

*Keith Binkley
Manager of Natural Resources
Snohomish County Public Utility District
425 783 1769 (office)
425 293 6201 (cell)*

Presler, Dawn

From: Jim Miller <JMiller@everettwa.gov>
Sent: Thursday, August 18, 2016 5:11 PM
To: Presler, Dawn
Cc: Binkley, Keith
Subject: JHP - DDVP update - schedule, cofferdam, process flow

Everett supports Keith's proposal.

Jim

From: Presler, Dawn [mailto:DJPresler@SNOPUD.com]
Sent: Tuesday, August 16, 2016 3:31 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; 'Anne Savery'; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'Rustay, Michael'; Jim Miller; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith; Schneider, Eric
Subject: JHP - DDVP update - schedule, cofferdam, process flow

Dear ARC,

Please see email below from Keith providing you with an update on the DDVP project. Please provide comment, if any, to us within 10 business days so we can send a letter to FERC indicating as such. Failure to respond will be deemed as approval of the suspension of releases for September.

~Dawn

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*Keith Binkley
Manager of Natural Resources
Snohomish County Public Utility District
425 783 1769 (office)
425 293 6201 (cell)*

Presler, Dawn

From: Thomas O'Keefe <okeefe@americanwhitewater.org>
Sent: Tuesday, August 16, 2016 10:33 PM
To: Applegate, Brock A (DFW)
Cc: Anne Savery; Presler, Dawn; Tim Romanski; Bryden, Andy -FS; Pacheco, James (ECY); Rustay, Michael; Jim Miller (JMiller@everettwa.gov); Mick Matheson; Binkley, Keith; Schneider, Eric; Whitney, Jennifer L (DFW)
Subject: Re: JHP - DDVP update - schedule, cofferdam, process flow

This sounds fine to me given the importance of this project. Once we have greater clarity with project completion, I would be interested in discussing how we can make up this opportunity as appropriate.

— Tom

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater
3537 NE 87th St.
Seattle, WA 98115
425-417-9012
okeefe@americanwhitewater.org
@AmerWhitewater

On Aug 16, 2016, at 3:43 PM, Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.gov> wrote:

WDFW concurs. As long as we will release the higher flows at another time.

Brock Applegate
Renewable Energy/Major Projects Mitigation Biologist
Washington Department of Fish and Wildlife
P.O. Box 1100
111 Sherman St. (physical address)
La Conner, WA 98257-9612

(360) 466-4345 x244 (office)
(360) 789-0578 (cell)
(360) 466-0515 (fax)

-----Original Message-----

From: Anne Savery [<mailto:asavery@tulaliptribes-nsn.gov>]
Sent: Tuesday, August 16, 2016 3:34 PM
To: Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; Applegate, Brock A (DFW); Pacheco, James (ECY); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith; Schneider, Eric

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Sent: Tuesday, August 16, 2016 3:34 PM
To: Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith; Schneider, Eric
Subject: RE: JHP - DDVP update - schedule, cofferdam, process flow

Tulalip doesn't object to suspending due to the construction schedule request to bank the water for future releases.

Anne Savery
Hydrologist
503-984-0667

From: Presler, Dawn [DJPresler@SNOPUD.com]
Sent: Tuesday, August 16, 2016 3:31 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; Anne Savery; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
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Keith Binkley
Manager of Natural Resources
Snohomish County Public Utility District
425 783 1769 (office)
425 293 6201 (cell)

Presler, Dawn

From: Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.gov>
Sent: Tuesday, August 16, 2016 3:43 PM
To: Anne Savery; Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; Pacheco, James (ECY); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith; Schneider, Eric; Whitney, Jennifer L (DFW)
Subject: RE: JHP - DDVP update - schedule, cofferdam, process flow

WDFW concurs. As long as we will release the higher flows at another time.

Brock Applegate
Renewable Energy/Major Projects Mitigation Biologist Washington Department of Fish and Wildlife P.O. Box 1100
111 Sherman St. (physical address)
La Conner, WA 98257-9612

(360) 466-4345 x244 (office)
(360) 789-0578 (cell)
(360) 466-0515 (fax)

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From: Anne Savery [mailto:asavery@tulaliptribes-nsn.gov]
Sent: Tuesday, August 16, 2016 3:34 PM
To: Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; Applegate, Brock A (DFW); Pacheco, James (ECY); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
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Hydrologist
503-984-0667

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Subject: JHP - DDVP update - schedule, cofferdam, process flow

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~Dawn

Presler, Dawn

From: Pacheco, James (ECY) <JPAC461@ecy.wa.gov>
Sent: Wednesday, August 17, 2016 7:58 AM
To: Applegate, Brock A (DFW); Anne Savery; Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith; Schneider, Eric; Whitney, Jennifer L (DFW)
Subject: RE: JHP - DDVP update - schedule, cofferdam, process flow

Ecology agrees and seconds WDFW's condition of releasing the higher flow at a later time.
Jim

James Pacheco
Natural Resource Scientist (Instream Flows) Water Resources Program Washington Department of Ecology
James.Pacheco@ecy.wa.gov
(360) 407-7458
"There is but one straight course, and that is to seek truth and pursue it steadily." --George Washington

-----Original Message-----

From: Applegate, Brock A (DFW)
Sent: Tuesday, August 16, 2016 3:43 PM
To: Anne Savery <asavery@tulaliptribes-nsn.gov>; Presler, Dawn <DJPresler@SNOPUD.com>; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov) <Tim_Romanski@fws.gov>; 'Bryden, Andy -FS' <abryden@fs.fed.us>; Pacheco, James (ECY) <JPAC461@ECY.WA.GOV>; 'Rustay, Michael' <mike.rustay@co.snohomish.wa.us>; 'Jim Miller (JMiller@everettwa.gov)' <JMiller@everettwa.gov>; 'Mick Matheson' <mick.matheson@ci.sultan.wa.us>; 'okeefe@americanwhitewater.org' <okeefe@americanwhitewater.org>
Cc: Binkley, Keith <KMBinkley@SNOPUD.com>; Schneider, Eric <EASchneider@SNOPUD.com>; Whitney, Jennifer L (DFW) <Jennifer.Whitney@dfw.wa.gov>
Subject: RE: JHP - DDVP update - schedule, cofferdam, process flow

WDFW concurs. As long as we will release the higher flows at another time.

Brock Applegate
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Sent: Tuesday, August 16, 2016 3:34 PM
To: Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; Applegate, Brock A (DFW); Pacheco, James (ECY); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'

Presler, Dawn

From: Rustay, Michael <mike.rustay@co.snohomish.wa.us>
Sent: Wednesday, August 17, 2016 8:31 AM
To: Presler, Dawn
Subject: RE: JHP - DDVP update - schedule, cofferdam, process flow


Hi Dawn,

This sounds good to me. Looking forward to seeing the project completed.

Thanks,

Mike

Mike Rustay | Interim Snohomish Basin LE Coordinator
Surface Water Management

 **Snohomish County**
Department of Public Works
3000 Rockefeller Ave, M/S 607
Everett, WA 98201

Phone: (425) 388-3464 x 4666
Mobile (425) 238-6041
FAX: (425) 388-6455
EMAIL: mike.rustay@snoco.org
WEB: www.snoco.org

NOTICE:

All emails, and attachments, sent to and from Snohomish County, are public records and may be subject to disclosure pursuant to the Public Records Act ([RCW 42.56](#))

From: Presler, Dawn [mailto:DJPresler@SNOPUD.com]
Sent: Tuesday, August 16, 2016 3:31 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov) <Tim_Romanski@fws.gov>; 'Bryden, Andy -FS' <abryden@fs.fed.us>; 'Anne Savery' <asavery@tulaliptribes-nsn.gov>; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov) <brock.applegate@dfw.wa.gov>; 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV) <JPAC461@ECY.WA.GOV>; Rustay, Michael <mike.rustay@co.snohomish.wa.us>; 'Jim Miller (JMiller@everettwa.gov)' <JMiller@everettwa.gov>; 'Mick Matheson' <mick.matheson@ci.sultan.wa.us>; 'okeefe@americanwhitewater.org' <okeefe@americanwhitewater.org>
Cc: Binkley, Keith <KMBinkley@SNOPUD.com>; Schneider, Eric <EASchneider@SNOPUD.com>
Subject: JHP - DDVP update - schedule, cofferdam, process flow

Dear ARC,

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~Dawn

Presler, Dawn

From: mick.matheson@ci.sultan.wa.us
Sent: Wednesday, August 17, 2016 8:30 AM
To: Presler, Dawn; Tim_Romanski@fws.gov; 'Bryden, Andy -FS'; 'Anne Savery'; brock.applegate@dfw.wa.gov; 'James (ECY) Pacheco'; 'Rustay, Michael'; 'Jim Miller'; okeefe@americanwhitewater.org
Cc: Binkley, Keith; Schneider, Eric
Subject: RE: JHP - DDVP update - schedule, cofferdam, process flow

The City of Sultan supports suspension of releases for September.

Mick Matheson, P.E.

City of Sultan
Director of Public Works/City Engineer
Tel: (360) 793-2231
Fax: (360) 793-3344
Direct: (360) 793-2262
Cell: (425) 583-6528
mick.matheson@ci.sultan.wa.us

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Sent: Tuesday, August 16, 2016 3:31 PM
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156 FERC ¶ 62,219
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Public Utility District No. 1 of
Snohomish County, Washington

Project No. 2157-196

ORDER AMENDING DIVERSION DAM VOLITIONAL FISH PASSAGE PLAN
AND APPROVING TEMPORARY MODIFICATION OF FLOW RELEASE
REQUIREMENTS

(September 26, 2016)

1. On September 6, 2016, Public Utility District No.1 of Snohomish County, Washington, licensee for the Henry M. Jackson Hydroelectric Project No. 2157, filed a request to amend the schedule for completing in-water work for construction of fish passage as required by the amended Diversion Dam Volitional Fish Passage Plan (fish passage plan). The licensee also requests a temporary modification to the flow release requirements as specified under Articles 412 and 416 of the project license.¹ The project is located on the Sultan River in Snohomish County, Washington. The project occupies, in part, federal lands administered by the U.S. Forest Service.

License Requirements and Background

2. Article 13 of the October 9, 2009 Settlement Agreement for the project requires in part, that the licensee provide volitional fish passage at the Sultan River diversion dam according to specific spawning escapement metrics for Chinook salmon or steelhead trout. In 2012,² the Federal Energy Regulatory Commission (Commission) approved the licensee's plans to complete the diversion dam modifications to allow for volitional upstream passage no later than two full construction seasons after design approval and obtaining all necessary permits. The schedule was amended in 2015³ to reduce the

¹ Order Issuing New License (136 FERC ¶ 62,188), issued September 2, 2011.

² Order Modifying and Approving Diversion Dam Volitional Passage Plan under Article 13 of Appendices A, C, And D (138 FERC ¶ 62,202), issued March 6, 2012.

³ Order Amending Diversion Dam Volitional Fish Passage Plan (153 FERC ¶ 62,217), issued December 21, 2015.

schedule for in-water construction work from two consecutive in-water construction seasons lasting from August 1- 30 to a single season lasting from June 1 – October 1. The licensee anticipated construction taking place during 2016.

3. Article 412 of the license approved the licensee's Whitewater Recreation Plan as filed June 17, 2010, with modifications and an addendum approved in 2012⁴ which provided methods for the licensee to avoid or curtail whitewater recreation flows that would be likely to exacerbate flooding in the City of Sultan. Article 416 of the license approved the licensee's Process Flow Plan as filed on September 27, 2010, which is implemented to enhance the ecological function of the Sultan River through channel maintenance, channel forming and flushing flows, and upstream and downstream fish migration flow releases.

Licensee's Plan/Request

4. The licensee requests to extend the schedule for in-water work for fish passage construction to October 31, 2016. The licensee states that completion of the work within a single construction season is in the best interest of the fish species using the Sultan River, as it would allow fish passage to occur earlier. Additionally, completion of the construction in a single season would minimize the in-water disturbance associated with the removing and subsequently replacing the cofferdams over the course of two seasons.

5. The licensee also requests a temporary suspension of high flow releases scheduled for September 2016 under Articles 412 and 416. The licensee states that the flow releases occur annually during the month of September for whitewater recreation, channel flushing, and upstream migration. Flow releases at this time would likely pose a threat to maintaining the cofferdams needed at the site for completing fish passage construction.

Agency Consultation

6. The licensee sent drafts of its proposals to the Aquatic Resource Committee (ARC)⁵ on August 16, 2016 regarding the temporary suspension of flow releases, and on

⁴ Order Approving Whitewater Recreation Plan Addendum Pursuant To Article 412 (140 FERC ¶ 62,088), issued July 30, 2012.

⁵ The ARC is comprised of representatives from: Public Utility District No.1 of Snohomish County, Washington; City of Everett, Washington; City of Sultan, Washington; Snohomish County; National Marine Fisheries Service; U.S. Fish and Wildlife Service; U.S. Forest Service; National Park Service; Washington Department of Fish and Wildlife; Washington Department of Ecology; Tulalip Tribes; and American Whitewater.

August 23, 2016 regarding the extended construction schedule. The Tulalip Tribes responded on August 23 asking for a timeline for the work to be completed, whether there were concerns or issues if the project would not be completed in the original timeframe (ending October 1), how the construction company would handle flows over their maximum design, and historical flow data through the end of October. The licensee responded to the Tulalip Tribes' comments on August 24, 2016. The licensee stated that the approximate completion date for construction is October 15, 2016, but there is a buffer in the schedule to allow for rains, storms, or other unforeseen events. The licensee stated that it does not anticipate any impacts to aquatic resources if the construction is not completed within the original time schedule because the cofferdam isolates the construction site and is designed to pass up to 1,235 cubic feet per second. Further, based on historical flows and the design of the cofferdam the licensee expects it would be able to complete construction without a problem in October. No other ARC members provided specific questions or concerns regarding the proposals.

7. In support of the proposal to complete the fish passage construction in a single season, the Washington Department of Fish and Wildlife (Washington DFW) modified the Hydraulic Project Approval for the project with a revised in-water work window of June 1 through October 31, 2016. In light of its discussions with ARC, the licensee filed for and received a hydraulic permit for the construction work from the Washington Department of Fish and Wildlife.

Discussion and Conclusion

8. The licensee's request would provide an overall benefit to the fishery resource in the project area by allowing volitional fish passage to occur one year earlier and by consolidating the disturbance related to in-water construction to a single construction season. The extended schedule provides additional time for completing in-water work to complete fish passage construction. The temporary suspension of flows for September would ensure minimal risk to the cofferdams and construction site. The licensee has consulted with the ARC as required and has the support of the ARC for both the extended schedule and the temporary suspension of flows under Articles 412 and 416. The licensee's September 6, 2016 request should be approved.

9. The licensee is reminded that in accordance with ordering paragraph (C) of the Commission's March 6, 2012 order, within 90 days of completion of installation of the associated fish passage facility and in accordance with license Article 303, it must file, for Commission approval, revised exhibits A, F, and G, as applicable, to describe and show the facility as built.

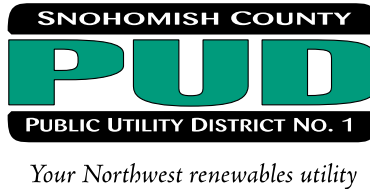
The Director orders:

(A) Public Utility District No.1 of Snohomish County, Washington's (licensee) request to amend the schedule for the Diversion Dam Volitional Passage Plan, filed September 6, 2016, for the Henry M. Jackson Hydroelectric Project No. 2157, is approved. The licensee's in-water work window is extended to October 31, 2016.

(B) The licensee's request to temporarily suspend high flow releases for the month of September 2016 under Article 412 and Article 416 of the license is approved.

(C) This order constitutes final agency action. Any party may file a request for rehearing of this order within 30 days from the date of its issuance, as provided in section 313(a) of the Federal Power Act, 16 U.S.C. § 825l (2012), and the Commission's regulations at 18 C.F.R. § 385.713 (2016). The filing of a request for rehearing does not operate as a stay of the effective date of this order, or of any other date specified in this order. The licensee's failure to file a request for rehearing shall constitute acceptance of this order.

Thomas J. LoVullo
Chief, Aquatic Resources Branch
Division of Hydropower
Administration and Compliance



September 19, 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
License Article 406 – Reservoir Elevation on September 15, 2016**

Dear Secretary Bose:

This letter is to notify the Commission that Public Utility District No. 1 of Snohomish County's (the District) Spada Lake Reservoir of the Jackson Hydroelectric Project (Project) water surface elevation went below the Project's License Article 406 target elevation of 1,420 feet msl defined for the period of August 16 to September 15, 2016. Specifically, at the end of day on September 6, 2016, the Spada Lake Reservoir had dropped below 1,420 feet msl and continued to decline to an elevation of 1,416.50 feet msl on September 15, 2016, the final day of the target elevation.

License Article 406 states that the water surface elevation targets may be modified based on emergency operations imposed on the District, abnormal deviations in the power market, or major power plant outages in the Northwest Power Pool region that are beyond the control of the District.

Increased generation at the Project during the month of August 2016 was utilized to compensate for a maximum flow limit below McNary Dam. This limit is imposed by Bonneville Power Administration (BPA) as part of the District's Slice generation contract and the Bi-Op requirements of the federal water management plan. Additional mitigating factors included a BPA imposed Grand Coulee Forebay minimum elevation target of 1,271.1 feet, and abnormally dry weather which severely limited Spada Lake reservoir inflows at the Project. In July and August 2016, mean monthly inflows to the reservoir were approximately 65% and 44% of the mean for those months.

The 1,416.50 feet msl reservoir elevation level did not create any adverse environmental impacts, nor did it impact the usability of the boat ramp at the South Fork Recreation Site. The Aquatic Resource Committee was notified today of this reservoir elevation event. The information in this letter will be reported in the Operational Compliance Monitoring Report pursuant to License Article 407 as required by License Article 406.

If you have any questions regarding this letter, please do not hesitate to contact Keith Binkley, Manager of Natural Resources, 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

cc: ARC

Presler, Dawn

From: Presler, Dawn
Sent: Monday, September 19, 2016 8:31 AM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; 'Anne Savery'; 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'Rustay, Michael'; 'Elizabeth Babcock - NOAA Federal'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith
Subject: JHP (FERC No. 2157) - reservoir target elevation letter to FERC
Attachments: 20160919 JHP P2157 LA406 re reservoir elevation target.pdf

Dear ARC,
Please see attached letter that I will be e-filing with FERC this morning regarding Spada Lake Reservoir dipping below the target elevation of 1,420 ft msl. If you have any questions regarding the content of the letter, please contact Keith.

Wishing you a great day.

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

PUD No. 1 of Snohomish County
PO Box 1107
Everett, WA 98206-1107

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

Project No. 2157-232--Washington
Henry M. Jackson Hydroelectric Project
Public Utility District No. 1 of
Snohomish County, Washington

January 9, 2017

Mr. Tom DeBoer
Public Utility District No. 1 of
Snohomish County, Washington
2320 California Street, P.O. Box 1107
Everett, WA 98206-1107

Subject: Reservoir Level Deviation Report Pursuant to Article 406

Dear Mr. DeBoer:

This letter is in response to your September 19, 2016 report filed with the Commission regarding a deviation in reservoir elevation that occurred from September 6 to September 15, 2016 at the Henry M. Jackson Project. You filed your report pursuant to Article 406 of the project license.¹ As discussed below, this deviation will not be considered a violation of Article 406.

Requirements

Article 406 requires that you operate the Henry M. Jackson Project consistent with the Spada Lake reservoir rule curves which divide Spada Lake water elevations into five states that dictate water management and shift throughout the water year (July 1 through June 30). In pertinent part, you are required to maintain a minimum impoundment water surface elevation in Spada Lake Reservoir at or above 1,420 feet mean sea level (msl) from August 16 through September 15 until a temperature conditioning structure is installed.²

¹ *Public Utility District No. 1 of Snohomish County, Washington*, 136 FERC ¶ 62,188 (2011).

² After a temperature conditioning structure is installed and operational, you are required to maintain a minimum impoundment water surface elevation in Spada Lake above 1,415 feet msl from August 16 through September 15.

Article 406 further states that the minimum Spada Lake water surface elevations may be modified as a result of system emergencies, operating emergencies beyond your control, and for short periods of time upon mutual agreement with the Aquatic Resource Committee.³ System emergencies include emergency operations imposed on the licensee by the North American Electric Reliability Corporation or Bonneville Power Administration (BPA), abnormal deviations in the power market, or major power plant outages in the Northwest Power Pool region that are beyond your control. If the impoundment water surface elevation is modified as described above, you are required to notify the Aquatic Resource Committee and the Commission within two business days after each such incident. You are required to document the modification in the annual operational compliance monitoring report filed with the Commission pursuant to Article 407, and describe the emergency that resulted in the modification of the water surface elevation.

Deviation Incident

You state in your September 19, 2016 report that the Spada Lake reservoir water surface elevation dropped below the required 1,420 feet msl on September 6, 2016 declining to 1,416.50 feet msl on September 15, 2016. You state that the deviation in reservoir levels was due to increased generation at the project during the month of August to compensate for BPA-imposed operational conditions on two other hydroelectric dams within the Northwest Power Pool region. Additionally, you stated abnormally dry weather severely limited inflows to the Spada Lake reservoir.

You further stated in your September 19, 2016 report that the deviation in reservoir level did not create any adverse environmental impacts nor did it impact the usability of the boat ramp at the South Fork recreation site. You stated that you notified the project's Aquatic Resource Committee, and that you will report the reservoir elevation deviation in an operational compliance monitoring report, as required by license Articles 406 and 407.

³ The Aquatic Resource Committee is composed of representatives from the National Marine Fisheries Service, U.S. Forest Service, U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, Washington Department of Ecology, Tulalip Tribes, Snohomish County, City of Everett, City of Sultan, and American Whitewater.

Review

The deviation in reservoir levels at the Henry M. Jackson Project from September 6 to September 15, 2016 was due to a loss of generation in the Northwest Power Pool for which you compensated, as well as reduced reservoir inflows. You notified the members of the Aquatic Resource Committee and state the deviation will be included in the next Operational Compliance Monitoring Report. Additionally, there were no reported adverse environmental impacts from the deviation. Based on our review of the available information, we will not consider this deviation as a violation of Article 406 of your license.

Thank you for filing your report. If you have any questions regarding this matter, please contact Dr. Jennifer Ambler at (202) 502-8586 or jennifer.ambler@ferc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Hocking".

Steve Hocking, Chief
Environmental and Project Review Branch
Division of Hydropower Administration
and Compliance

Appendix 3

Consultation Documentation Regarding Draft Report

Presler, Dawn

From: Presler, Dawn
Sent: Friday, September 15, 2017 8:06 AM
To: 'Wright, Lindsay'; 'Janet Curran - NOAA Federal'; 'Anne Savery'; 'Vacirca, Richard -FS'; 'Ken Walker'; 'Jim Miller (JMiller@everettwa.gov)'; 'okeefe@americanwhitewater.org'; 'Rustay, Michael'; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV)
Cc: Binkley, Keith
Subject: JHP (FERC No. 2157) - draft OCMP Annual Rpt for your review
Attachments: 201709 OCMP Annual Report 2016 WY 16-17.docx

Dear ARC Members,
Attached is the draft Operations Compliance Monitoring Plan Annual Report for WY 2016-2017 for your 30-day review and comments, if any. Please provide comments, if any, back to me (and cc: Keith) by October 16. Thanks.

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

PUD No. 1 of Snohomish County
PO Box 1107
Everett, WA 98206-1107

Presler, Dawn

From: Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.gov>
Sent: Monday, October 16, 2017 11:43 AM
To: Presler, Dawn; 'Wright, Lindsay'; 'Janet Curran - NOAA Federal'; 'Anne Savery'; 'Vacirca, Richard -FS'; 'Ken Walker'; 'Jim Miller (JMiller@everettwa.gov)'; 'okeefe@americanwhitewater.org'; 'Rustay, Michael'; Pacheco, James (ECY)
Cc: Binkley, Keith
Subject: WDFW Comments on the draft Operations Compliance Monitoring Plan Annual Rpt -- Jackson Project (FERC No. 2157)
Attachments: Operations Compliance Monitoring Plan_Annual_Report_2016_WY_16-17.docx

CAUTION: THIS EMAIL IS FROM AN EXTERNAL SENDER.

Do not click on links or open attachments if the sender is unknown or the email is suspect.

Hi Dawn, The Washington Department of Fish and Wildlife (WDFW) recommends that Snohomish County Public Utility District No. 1 (SnoPUD) include the Channel Maintenance Flow and Channel Forming Flow record in the annual report. WDFW recognizes that SnoPUD did not achieve these flows within the time period described in the annual report. WDFW still recommends that SnoPUD add the additional flow record to understand if the Aquatic Resource Committee (ARC) should expect these larger, voluminous flows in the upcoming year or so. Channel Maintenance and Forming Flows have a larger scope of years within a decade. The ARC would benefit from an update on the required larger flows for future planning and consultation with the SnoPUD.

WDFW appreciates the SnoPUD adding these longer term flows to the record in the annual report. SnoPUD should contact the ARC, if they plan on moving forward without including WDFWs recommendation, so that we can discuss at the quarterly ARC meeting.

Sincerely, Brock

Brock Applegate
Renewable Energy/Major Projects Mitigation Biologist
Washington Department of Fish and Wildlife
P.O. Box 1100
111 Sherman St. (physical address)
La Conner, WA 98257-9612

(360) 466-4345 x244 (office)
(360) 789-0578 (cell)
(360) 466-0515 (fax)

From: Presler, Dawn [mailto:DJPresler@SNOPUD.com]
Sent: Friday, September 15, 2017 8:06 AM
To: 'Wright, Lindsay' <lindsay_wright@fws.gov>; 'Janet Curran - NOAA Federal' <janet.curran@noaa.gov>; 'Anne Savery' <asavery@tulaliptribes-nsn.gov>; 'Vacirca, Richard -FS' <rvacirca@fs.fed.us>; 'Ken Walker' <ken.walker@ci.sultan.wa.us>; 'Jim Miller (JMiller@everettwa.gov)' <JMiller@everettwa.gov>; 'okeefe@americanwhitewater.org' <okeefe@americanwhitewater.org>; 'Rustay, Michael' <mike.rustay@co.snohomish.wa.us>; Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.gov>; Pacheco, James (ECY) <JPAC461@ECY.WA.GOV>
Cc: Binkley, Keith <KMBinkley@SNOPUD.com>
Subject: JHP (FERC No. 2157) - draft OCMP Annual Rpt for your review

Appendix 4

Response to Comment Regarding Draft Report

Comment	Response
B. Applegate, WDFW, email dated October 23, 2017	
<p>The Washington Department of Fish and Wildlife (WDFW) recommends that Snohomish County Public Utility District No. 1 (SnoPUD) include the Channel Maintenance Flow and Channel Forming Flow record in the annual report. WDFW recognizes that SnoPUD did not achieve these flows within the time period described in the annual report. WDFW still recommends that SnoPUD add the additional flow record to understand if the Aquatic Resource Committee (ARC) should expect these larger, voluminous flows in the upcoming year or so. Channel Maintenance and Forming Flows have a larger scope of years within a decade. The ARC would benefit from an update on the required larger flows for future planning and consultation with the SnoPUD.</p> <p>WDFW appreciates the SnoPUD adding these longer term flows to the record in the annual report. SnoPUD should contact the ARC, if they plan on moving forward without including WDFWs recommendation, so that we can discuss at the quarterly ARC meeting.</p>	<p>A link to the District's web page containing the Process Flow Log was added to Section 2. The ARC should refer to the Process Flow Log on the web site for the up-to-date information. Inclusion of the full Process Flow Log is not a requirement of the OCMP and would only be current for a short duration of time. Referring to the updated Process Flow Log on the web would provide the ARC with the most current data.</p>