



Your Northwest renewables utility

May 20, 2016

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:

Public Utility District No. 1 of Snohomish County (the District) will be modifying the default instream flow schedule for the Jackson Hydroelectric Project (Project) during the course of this upcoming water year (July 1, 2016 through June 30, 2017); this modification applies to Reach 3 (River Mile (RM) 9.7 to 16.1) of the Sultan River, see Attachment 1: Water Year 2016-2017 Modified Instream Flow Schedule. This modification is consistent with the requirements identified under "A-LA 9: Minimum Flows" in Appendix G of the Project's License.

The purpose of this change from the default schedule identified in A-LA 9 is to provide suitable construction conditions and to address the resultant change in fish species utilizing Reach 3, coincident with the implementation of fish passage at the City of Everett's Diversion Dam at RM 9.7. With the introduction of anadromous fish species (salmon and steelhead) to Reach 3, the emphasis of flow management will shift from meeting the physical habitat and water quality needs of the resident rainbow trout populations towards meeting those of fall (Chinook and coho salmon) and spring (steelhead) spawning populations. In contrast to the default flow scheduled identified in A-LA 9, this change will involve re-shaping the flow release schedule but result in no net change to the annual flow budget of 20,362 acre-feet. This will balance physical habitat and temperature requirements of the modified fish community.

The District emailed the Aquatic Resources Committee (ARC) the proposed Reach 3 flow schedule on March 18, 2016, for a 30-day review and comment period. The District consulted with the ARC at the last Quarterly ARC Meeting in April 2016 regarding the benefits of the modified flow schedule where it was agreed to add a caveat of if Diversion Dam Volitional Passage construction necessitated instream flows of 20 cfs from September 22 to September 30, then the extra water would be reallocated (see Attachment 2: Consultation Documentation). Therefore, the proposed instream flow schedule has been updated to reflect this caveat. As such, the District will implement this modified flow schedule for Reach 3 effective for Water Year 2016-2017.

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,

/s/ Giuseppe Fina

Giuseppe Fina
Interim Assistant General Manager of Generation
(425) 783-1825
GFina@snopud.com

cc: Keith Binkley, District

ATTACHMENT 1:
Water Year 2016-2017 Modified Instream Flow Schedule for Reach 3

Timeframe	Release Flow (cfs)
July 1*-15	20
July 16-31	20
August 1-15	20
August 16-31	20
September 1-14	20
September 15-21	20
September 22-30**	45
October 1-15	45
October 16-31	45
November 1-15	20
November 16-30	15
December 1-15	15
December 16-31	15
January 1-15	15
January 16-31	15
February 1-14	15
February 15-28	20
March 1-15	45
March 16-31	45
April 1-15	45
April 16-30	45
May 1-15	45
May 16-31	45
June 1-15	25
June 16-30	25

* July 1 begins the water year.

** If Diversion Dam Volitional Passage construction necessitates reduced instream flows of 20 cfs from September 22 to September 30, then the extra water would be reallocated.

ATTACHMENT 2:
Consultation Documentation

Presler, Dawn

From: Binkley, Keith
Sent: Thursday, March 03, 2016 10:13 AM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); Pacheco, James (ECY); Anne Savery (asavery@tulaliptribes-nsn.gov); 'Applegate, Brock A (DFW)'; 'Rustay, Michael'; Andrew Bryden (abryden@fs.fed.us); 'Mick Matheson'; 'Thomas O'Keefe'; Jim Miller (JMiller@everettwa.gov); Presler, Dawn
Subject: Reach 3 flows for Water Year 2016
Attachments: Reach 3 WUA.pdf; Variable Instream Flow Release Schedule for Reach 3 - revised and updated.xls

ARC members – this is the time of year when we discuss and subsequently establish flow releases for Reach 3 for the upcoming water year. Since license issuance, we have shaped the annual release of the 20,362 acre feet budget in a way that integrates accretion and balances physical habitat for the resident rainbow trout fishery with water quality (temperature). For the coming water year (starting July 1), we have a couple items that warrant reshaping of the monthly releases. First off, we will need to have minimum flows as low as possible during construction of the fish passage at the Diversion Dam (DDVP). We will be installing coffer dams to isolate the work site and are requesting that releases be no more than 20 cfs during the period of in-water work (June 15 to October 1). For reference, 20 cfs was the year-round minimum instream flow release during the past license. Jim P. and Anne S. have already indicated their support for this adjustment. Secondly, with passage complete, we will want to re-shape the flow regime preferentially for either: 1) fall spawners, 2) spring spawners, or 3) both. For what it's worth: the post passage default flow regime in A-LA 9 places proportionately more emphasis on fall releases simply because accretion tends to be greater in the spring. One option would be to mimic that for the portion of the water year outside the construction season. We also have the latitude to adjust the release schedule, as outlined in A-LA 9.

Attached is an Excel file with several scenarios for how we might choose to manage releases for Water Year 2016: 1) the current, 2) the joint spring / fall anadromous spawning, 3) the spring anadromous spawning, and 4) the fall anadromous spawning. I simply adjusted releases, within the budget, to maximize spawning habitat in accordance with Table 4-1 (attached pdf) from the instream flow report. I assumed 20 cfs for the release during the construction season (highlighted in yellow) and used median accretion values. One item to note: at 20 cfs, the rate of longitudinal warming will be greater than at higher flow releases. As such, we will monitor and actively blend releases from the aux line and the cone valve to ensure compliance with state water quality criteria.

For DDVP contracting purposes, I would like to see if we all could get this resolved by April 1. If we can't, the District will still submit a preliminary Flow Report containing a recommended release schedule for the annual water budget for the upcoming water year to the ARC for their review. If we need to, we can discuss and finalize at our quarterly meeting on April 19th. We will then adjust the review schedule, as necessary, to meet our submittal requirements to FERC. I appreciate folks giving this their attention.

Thanks

Keith

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: Friday, March 18, 2016 3:43 PM
To: Presler, Dawn
Subject: RE: JHP (FERC No. 2157) - A-LA 9: WY2016-2017 Reach 3 flow schedule for your review

[Everett defers to the fisheries experts on this issue.](#)

Jim

From: Presler, Dawn [mailto:DJPresler@SNOPUD.com]
Sent: Friday, March 18, 2016 1:54 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'; 'Thomas O'Keefe'
Cc: Binkley, Keith
Subject: JHP (FERC No. 2157) - A-LA 9: WY2016-2017 Reach 3 flow schedule for your review

Dear ARC Members,

Attached is the proposed flow schedule in Sultan River's Reach 3 for Water Year 2016-2017, per A-LA 9: Minimum Flows of the Jackson License, for your review and comment. The emphasis of flow management will shift from meeting the physical habitat and water quality needs of the resident rainbow trout populations towards meeting those of fall (Chinook and coho salmon) and spring (steelhead) spawning populations. It also takes into account construction activities at the Diversion Dam, and meeting the annual flow budget of 20,362 acre-feet for Reach 3. We can discuss at the ARC in more detail if needed on April 19, but feel free to contact Keith if you have questions in the meanwhile. Comments will be due back to Keith with cc: to me by May 1, 2016. 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: Binkley, Keith
Sent: Wednesday, April 27, 2016 8:40 AM
To: Presler, Dawn
Subject: FW: ARC 2Q - status of technical discussions

From: Bryden, Andy -FS [mailto:abryden@fs.fed.us]
Sent: Tuesday, April 26, 2016 2:55 PM
To: Binkley, Keith <KMBinkley@SNOPUD.com>
Subject: RE: ARC 2Q - status of technical discussions

Regarding the flow release schedule as proposed at the April 19th meeting. Go forth and release as proposed. I liked the adaptive addition in the case passage work was completed earlier than October 1st that we would increase flows.

Cheers



Andy Bryden
South Zone Hydrologist
Forest Service
Mt. Baker-Snoqualmie National Forest

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f: 360-677-2450
abryden@fs.fed.us

74920 NE Stevens Pass Highway
Skykomish, WA 98288
www.fs.fed.us



Caring for the land and serving people

From: Binkley, Keith [mailto:KMBinkley@SNOPUD.com]
Sent: Thursday, April 21, 2016 2:46 PM
To: Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.gov>; 'Pacheco, James (ECY)' <JPAC461@ecy.wa.gov>; Anne Savery (asavery@tulaliptribes-nsn.gov) <asavery@tulaliptribes-nsn.gov>; Bryden, Andy -FS <abryden@fs.fed.us>; Rustay, Michael <mike.rustay@co.snohomish.wa.us>; okeefe@americanwhitewater.org; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov) <Tim_Romanski@fws.gov>; Jim Miller (JMiller@everettwa.gov) <JMiller@everettwa.gov>; 'Mick Matheson' <mick.matheson@ci.sultan.wa.us>
Cc: DJPRESLER@SNOPUD.COM
Subject: ARC 2Q - status of technical discussions

ARC members – thanks for hanging in for the long meeting on Tuesday. Minutes from the meeting are forthcoming. I also prepared the attached “road map” to help streamline our continued discussions. As you will see, it is a quick summary of the status of agenda items 4 through 8.

- Items 4, 5, and 8 are straight forward. Related to Item 8, you will see other habitat monitoring that will be conducted this year as a result of the “significant high flow event” that occurred in November.
- Item 6 (WTC Phase 2) will be discussed at an upcoming workshop to be scheduled within the next month.
- Item 7 is in development so what you see is simply the current direction that the District is headed towards in its FHE proposal for fish detection at the DDAM.

I hope you will find this helpful and that it makes things easier.

Keith

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

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Presler, Dawn

From: Binkley, Keith
Sent: Friday, May 06, 2016 9:20 AM
To: 'Anne Savery'; Applegate, Brock A (DFW); 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'; 'Thomas O'Keefe'
Subject: RE: Conditional Concurrence for A-LA 9: WY2016-2017 Reach 3 flow schedule-- Jackson Hydro

Thanks - I appreciate the concurrence. From our group discussion, I understand that there to be full support for reducing flows during construction. In the schedule, we bumped up to 45 cfs on September 22. Given that construction may not be complete by then, we agreed that flagging the September 22 to 30 timeframe as "subject to change" made sense. If we stayed at 20 cfs through that period, we would reallocate that 8 days of 45 cfs elsewhere. I believe we will be making some "real time" decisions around that time frame.

During construction, we will continue with Phase 1 of the WTC program but you are right that at 20 cfs during late summer, most of the water will be coming from the base of Culmback Dam so that we can stay compliant with state WQ criteria.

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

From: Anne Savery [mailto:asavery@tulaliptribes-nsn.gov]
Sent: Friday, May 06, 2016 6:52 AM
To: Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.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>; 'Thomas O'Keefe' <okeefe@americanwhitewater.org>; Binkley, Keith <KMBinkley@SNOPUD.com>
Subject: RE: Conditional Concurrence for A-LA 9: WY2016-2017 Reach 3 flow schedule-- Jackson Hydro

This is late, I realize. Tulalip concurs with the flows in Reach 3 for WY 2016-2017. If construction ends early, it is our understanding that the flow releases will NOT shift to earlier, larger releases. e.g. no 45 cfs flows in late September - correct?

Our understanding is that during construction the water will be released from the base of Culmback Dam. It will be important to release cold water into Reach 3 - as our focus shifts to salmon.

Anne Savery
Hydrologist
503-984-0667

From: Applegate, Brock A (DFW) [Brock.Applegate@dfw.wa.gov]
Sent: Monday, May 02, 2016 4:04 PM
To: Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; Anne Savery; Pacheco, James (ECY); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'Thomas O'Keefe'; Binkley, Keith
Subject: Conditional Concurrence for A-LA 9: WY2016-2017 Reach 3 flow schedule-- Jackson Hydro

Hi Keith, If the current recommended flows represent this sentiment, “For what it’s worth: the post passage default flow regime in A-LA 9 places proportionately more emphasis on fall releases simply because accretion tends to be greater in the spring,” then we concur with the Reach 3 recommended flow regime. We realize that flows will be reduced some in the Fall for fish passage project at the Diversion Dam.

Thank you for consulting with the ARC and WDFW.

Sincerely, Brock

Brock Applegate

Renewable Energy/Major Projects Mitigation Biologist Washington Department of Fish and Wildlife P.O. Box 1100 La Conner, WA 98257-9612

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(360) 789-0578 (cell)

(360) 466-0515 (fax)

From: Presler, Dawn [mailto:DJPresler@SNOPUD.com]

Sent: Friday, March 18, 2016 1:54 PM

To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Bryden, Andy -FS'; 'Anne Savery'; Applegate, Brock A (DFW); Pacheco, James (ECY); 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'Mick Matheson'; 'Thomas O'Keefe'

Cc: Binkley, Keith

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Dawn Presler

Sr. Environmental Coordinator

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