

Your Northwest renewables utility

November 1, 2012

VIA ELECTRONIC FILING

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

Re:

Jackson Hydroelectric Project, FERC No. P-2157

Marsh Creek Slide Modification Report

License Article 402

Dear Secretary Bose:

Enclosed is the Public Utility District No. 1 of Snohomish County's Marsh Creek Slide Modification Report per License Article 402 for the Jackson Hydroelectric Project. The draft report was provided to the Aquatic Resource Committee prior to this filing; consultation and responses to comments are included in the report's Appendices 2 and 3.

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

Sincerely

Kim D. Moore, P.E.

Assistant General Manager of Generation, Water, and Corporate Services

KDMoore@snopud.com

(425) 783-8606

Enclosed: MCS Modification Report

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



Marsh Creek Slide Modification Report (License Article 402)



November 2012

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ACRONYMS & ABBREVIATIONS

A-LA Aquatic License Article ARC Aquatic Resource Committee

District Public Utility District No. 1 of Snohomish County

FERC Federal Energy Regulatory Commission

HEA Habitat Enhancement Account

MCS Marsh Creek Slide

PM&E Protection, mitigation and enhancement

RM River mile

RSP Revised Study Plan

1. INTRODUCTION

1.1.Background

Public Utility District No. 1 of Snohomish County (District) received from the Federal Energy Regulatory Commission (FERC) a license for the existing 111.8-megawatt (MW) Henry M. Jackson Hydroelectric Project (FERC No. 2157) (Project) on September 2, 2011 (License). Included in the License is License Article 402, Marsh Creek Slide Monitoring and Modification Plan (MCS Plan).

On December 11, 2004, a natural landslide occurred in the Sultan River near Marsh Creek at River Mile (RM) 7.6. The Marsh Creek Slide (MCS) blocked or reduced the upstream passage of adult anadromous salmonids upstream of River Mile 7.6. Since then, the characteristics and geometry of the landslide have changed and currently allow some fish passage in part due to high flows. During the relicensing process, the District conducted the Revised Study Plan No. 20 Phase 1: Fish Passage Assessment, Evaluation of Salmon and Steelhead Migration after a Landslide on the Sultan River (Ruggerone 2008) and the Revised Study Plan No. 24: Feasibility of Marsh Creek Slide Modification to Improve Fish Passage (CH2M Hill 2009). These plans analyzed whether the Marsh Creek Slide is a hindrance to fish passage in the Sultan River and if so, whether modifications to the slide could improve passage.

During meetings with the Aquatic Resource Committee (ARC), modification of the slide was deemed necessary to provide safe, timely, and effective access to 2.1 miles of salmon and steelhead habitat up to the Diversion Dam, and an additional 6.6 miles of historically available habitat upstream of the Diversion Dam after passage is provided at that structure. The ARC anticipated that this measure would increase salmon and steelhead production in the Sultan River by allowing these species to fully utilize available habitat and production capacity upstream of the Marsh Creek Slide.

As such, the District and ARC developed the MCS Plan and filed it with the FERC, which was approved in License Article 402 with minor modifications.

Modifications to the Marsh Creek Slide were conducted by the District's contractor in July 2012 as specified in the contract drawings (see Appendix 1).

1.2.Purpose

The purpose of this report, as identified in Section 5 of the MCS Plan, is to detail the methods used to modify the Marsh Creek Slide.

1.3.Consultation

The ARC was provided a 30-day comment period on the draft report. Consultation documentation is included in Appendix 2, with responses to comments included in Appendix 3.

2. PRE-MODIFICATION METHODS

2.1.Topographic Survey

The District engaged with a licensed surveyor (Harmsen & Associates) to document the existing topographic conditions of the landslide during 2010. Survey control marks (rebar with caps) were left in the field and have survived to act as permanent markers/benchmarks.

A geotechnical engineering firm (Terracon) sampled boulders within the slide area and made recommendations on techniques which could be used for alteration.

2.2.Modeling

The District retained a consulting firm (R2 Resource Consultants) to hydraulically model the existing flow through the slide area based upon the topographic data collected and to create a model of a flow channel to allow anadromous passage. Fish passage criteria from Powers and Orsborn were applied to establish an effective passage route. These model results were converted to a public works contract which was advertised in 2011.

2.3. Fish Salvage Operations

Fish biologists from the District and R2 Resource Consultants used electrofishing techniques to remove and relocate fish from the modification project site, as required by License Article 402.

3. MODIFICATION METHODS

3.1. Methodology

The work area was isolated by a contractor (Santana) using gravel filled bags, and de-fished by District and consultant staff. The work was done via a combination of hand-labor, electric jack-hammer, and drilling and setting of .22-calibre size charges to fracture rock.

Isolation work began the week of July 16. Modification of rock took place between July 19 and July 26 utilizing a 4-man crew working with hand-tools and an electric powered drill and jack-hammer to conduct work as specified in the contract drawings (see Appendix C).

3.2. Before and After Photos



Figure 1. Marsh Creek Slide before modification, July 16, 2012.



Figure 2. Marsh Creek Slide after modification, July 30, 2012.

4. FUTURE REPORTING

To provide the broader context of fish use of the Sultan River, escapement survey data within the index area around the Marsh Creek Slide will be provided in the annual reports for the Fisheries and Habitat Monitoring Plan per License Article 410.

As indicated in Section 5 of the MCS Plan, the District will submit a report within six months of the sixth-year anniversary of the filing of this report (i.e. by May 2019). The report will document the results of the effectiveness of the initial rockslide modifications at improving fish passage, and include any proposals and anticipated costs for additional modifications to improve fish passage at the Marsh Creek rockslide. Any required future modifications will be funded by the Habitat Enhancement Account per the Fish Habitat Enhancement Plan. The report will be prepared after consultation with the ARC and include responses, based on Project-specific information, to any comments received.

5. REFERENCES

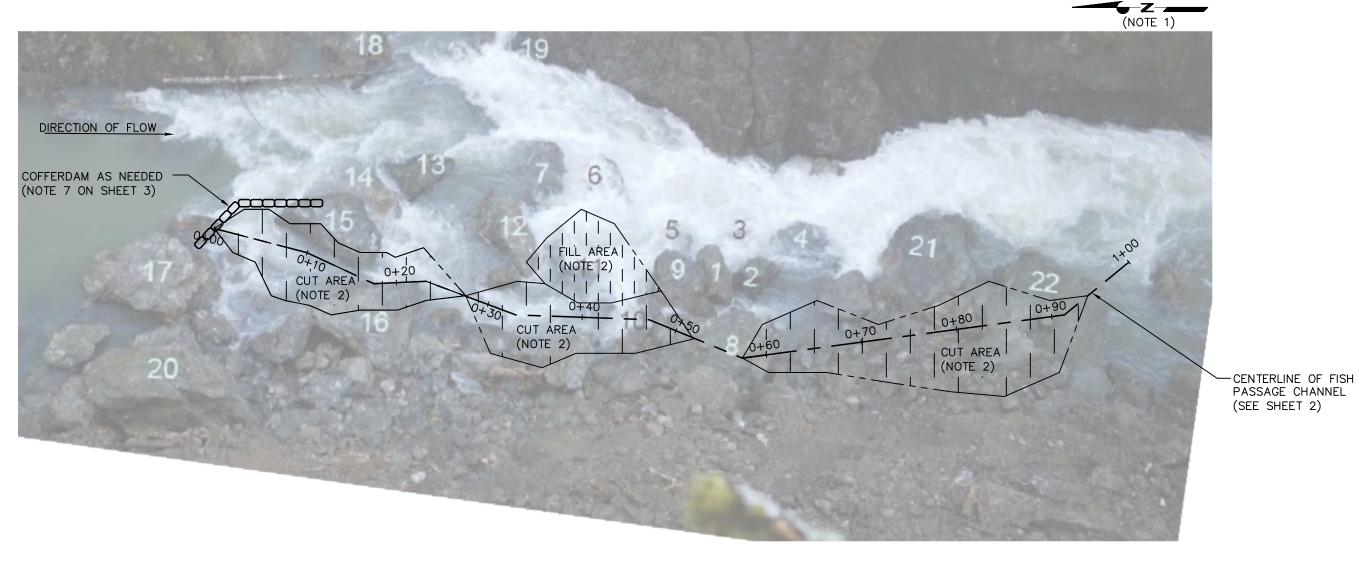
CH2M Hill. 2009. Fish Passage Feasibility at the Sultan River Diversion Dam. Phase 2 Assessment.

Powers, P. D., and J. F. Orsborn. 1985. Analysis of Barriers to Upstream Fish Migration. An Investigation of the Physical and Biological Conditions Affecting Fish Passage Success at Culverts and Waterfalls. Final Project Report. Part 4 of 4. Submitted to the Bonneville Power Administration, Portland, Oregon. Project No. 82-14. August 1985.

Ruggerone, G. 2008. Phase 1 Fish Passage Assessment. Evaluation of Salmon and Steelhead Migration after a Landslide on the Sultan River. Natural Resource Consultants, Inc.

Appendix 1

Modification Contract Drawings

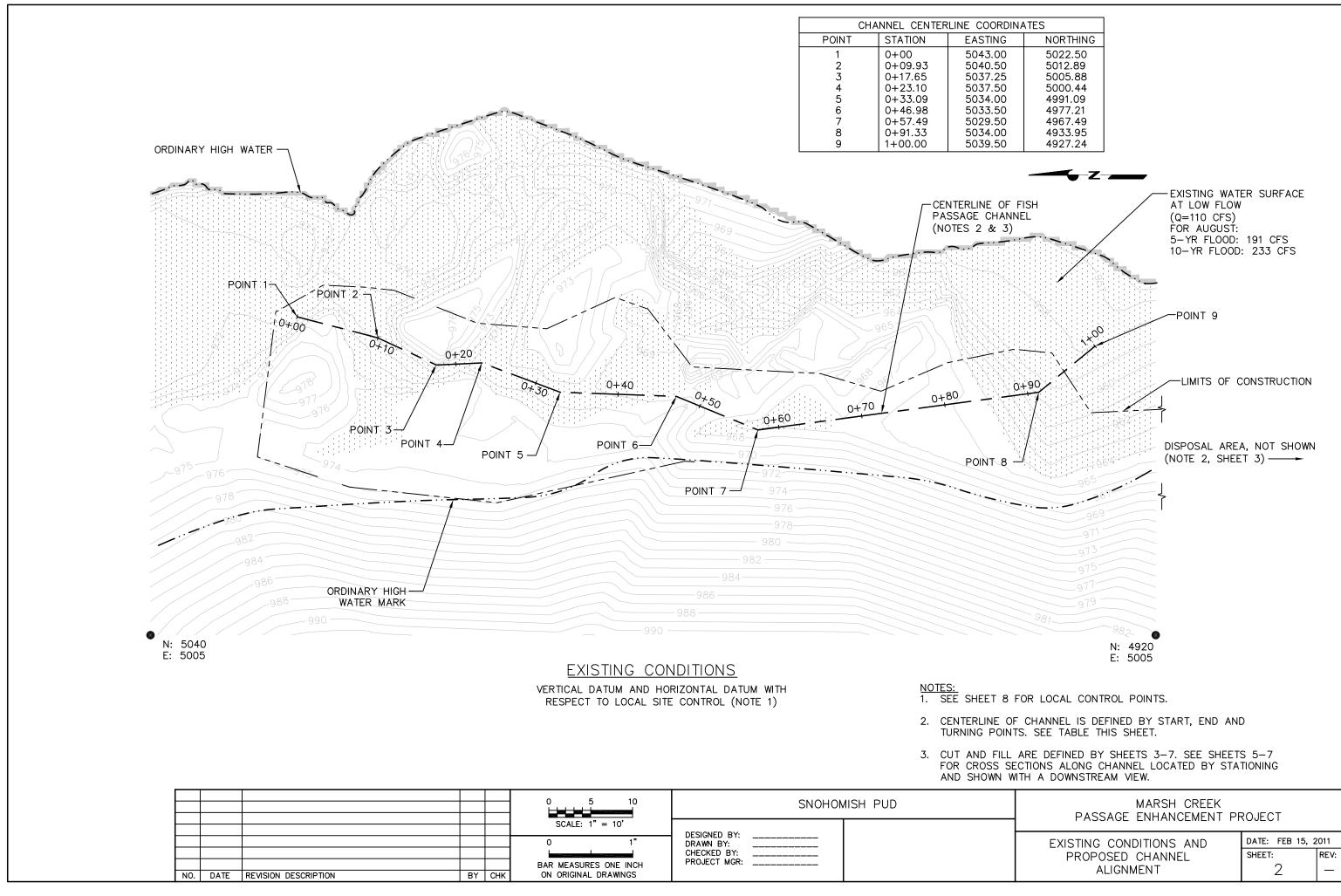


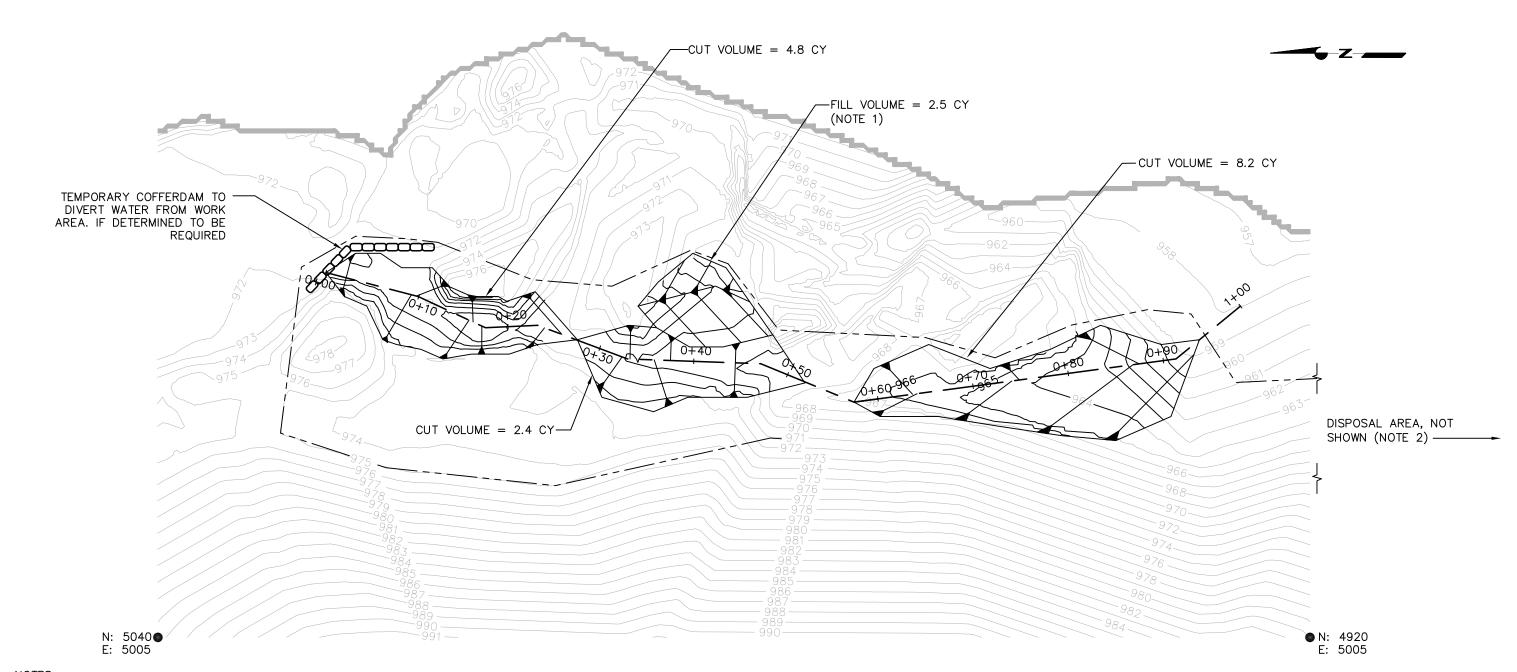
SITE OVERVIEW

NOTES:

- 1. NORTH ORIENTATION APPROXIMATE. PROJECT BASED ON LOCAL CONTROL, SEE SHEET 8.
- 2. SEE SHEET 3 FOR CUT AND FILL REQUIRED FOR CHANNEL.
- GEOTECHNICAL EVALUATION DID <u>NOT</u> EXAMINE STABILITY OF ADJACENT CANYON WALLS. CONTRACTOR MUST HAVE ONSITE LEAD RESPONSIBLE FOR RAPIDLY REMOVING CREW IN EVENT OF SUSPENDING WORK.

					0 5 10	SNOHOMISH PUD	MARSH CREEK PASSAGE ENHANCEMENT PI	ROJECT	
					SCALE: 1" = 10'	DESIGNED BY:		•	
					0 1"	DRAWN BY: CHECKED BY:	FISH PASSAGE CHANNEL SITE OVERVIEW	DATE: FEB 15, 2 SHEET:	2011 REV:
NO.	DATE	REVISION DESCRIPTION	BY	CHK	BAR MEASURES ONE INCH ON ORIGINAL DRAWINGS	PROJECT MGR:		1	





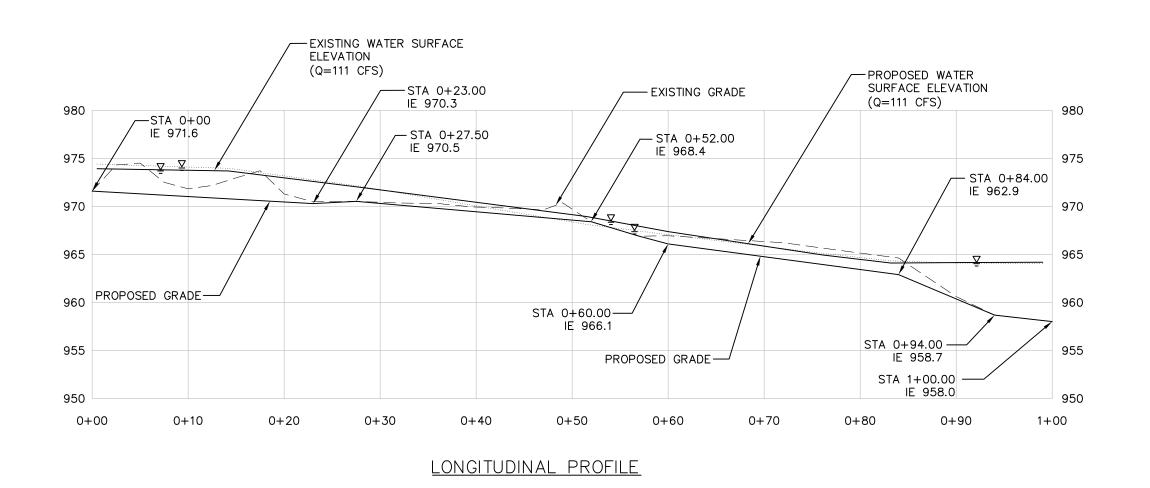
NOTES:

- 1. FILL MATERIAL SHALL BE MINIMUM 12" ANGULAR ROCK FROM CUT AREAS.
- 2. DISPOSE OF EXCESS CUT MATERIAL AS DIRECTED BY DISTRICT ON BANK APPROXIMATELY 50 FEET DOWNSTREAM OR IN AREA OF FILL CALLED OUT ON PLAN. PROVIDED BASE DOES NOT INCREASE IN WIDTH FROM THAT SHOWN.
- 3. STATIONING DEFINES THE THALWEG OF PROPOSED CHANNEL.
- 4. SHEETS 5 THRU 7 DEPICT CUT AND FILL SECTIONS ALONG STATIONING.
- 5. GRADE TOLERANCE SHALL BE WITHIN ± 0.2 FEET AT INVERT AND ± 0.5 FEET IN GENERAL.
- 6. WHERE A <0.5' CUT IS SHOWN, CONTRACTOR MUST AT A MINIMUM REMOVE SOME ROCK USING MECHANICAL MEANS OR HAND TOOLS.
- 7. CONTRACTOR SHALL COMPLY WITH PERMITS. THIS MAY REQUIRE INSTALLATION OF SANDBAGS OR INFLATABLE COFFERDAM AND PUMPS TO DIVERT WATER AROUND WORK AREA. DESIGN OF WATER QUALITY CONTROL TO BE RESPONSIBILITY OF CONTRACTOR.
- 8. AS REQUIRED, FISH RESCUE SHALL BE PERFORMED BY DISTRICT. CONTRACTOR SHALL COORDINATE WITH OWNER WHEN DEWATERING WORK AREAS AND PROVIDE 7 DAYS ADVANCE NOTICE PRIOR TO STARTING WORK.

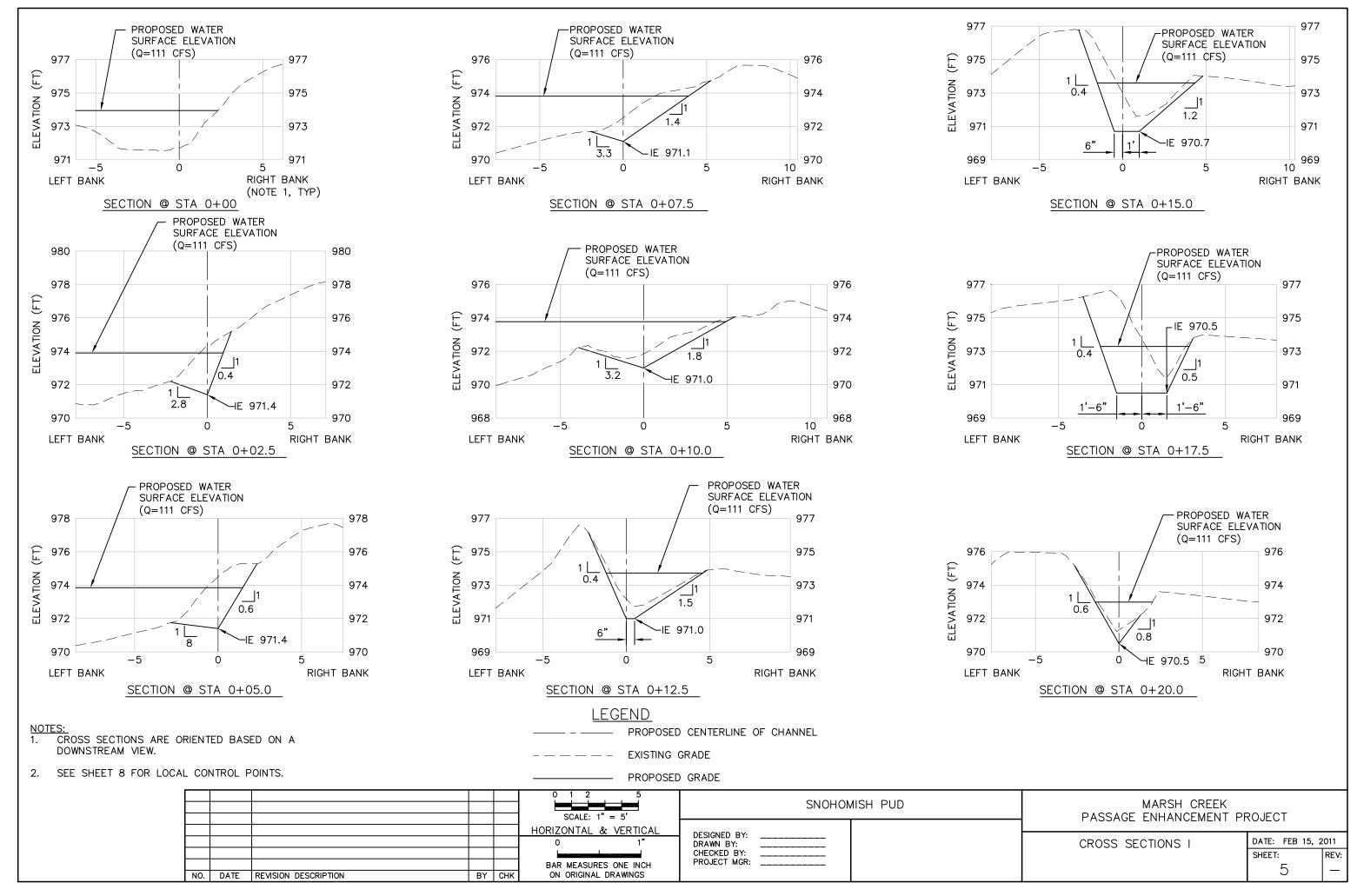
PROPOSED GRADING PLAN

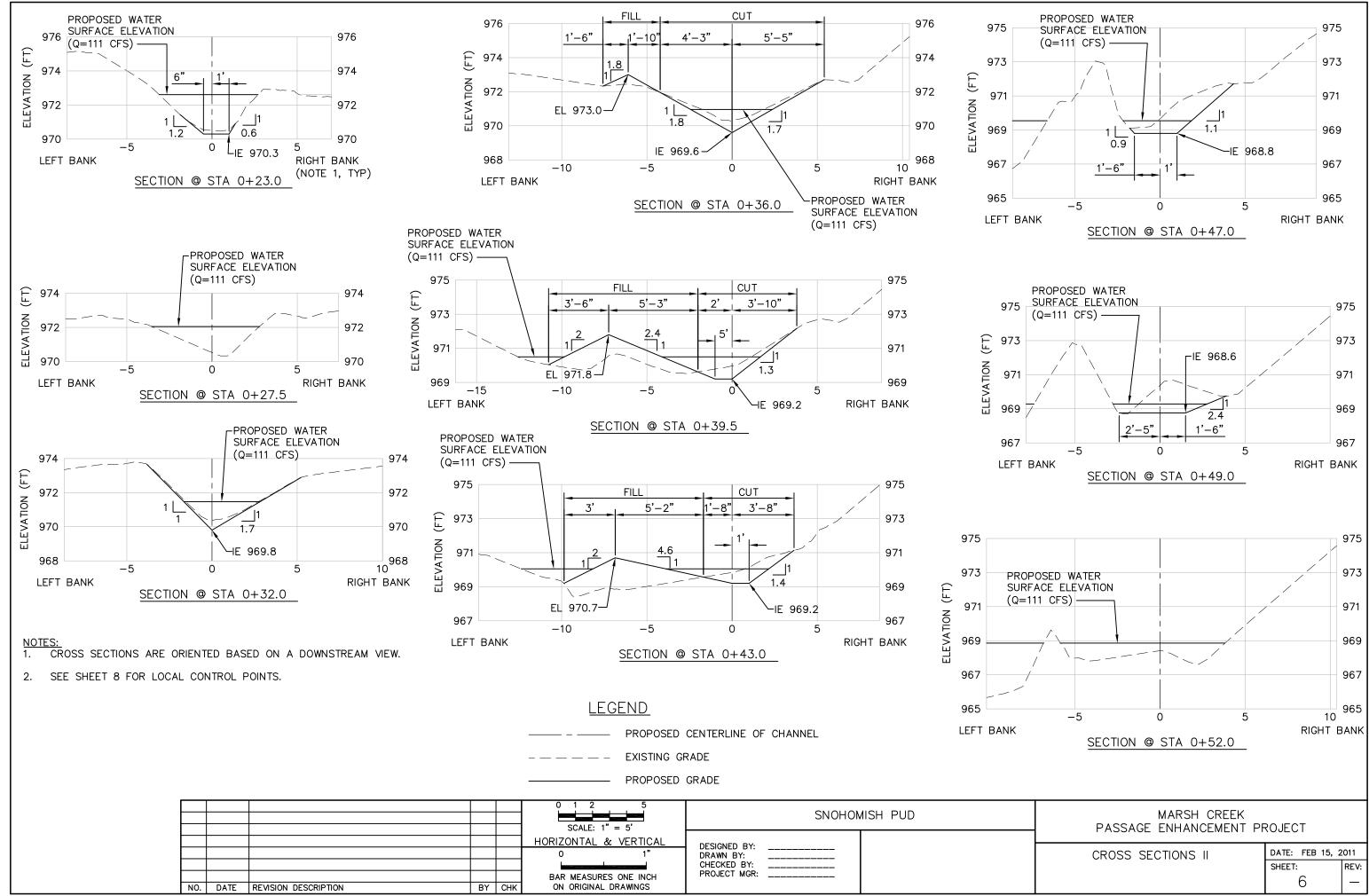
VERTICAL DATUM AND HORIZONTAL DATUM WITH RESPECT TO LOCAL SITE CONTROL

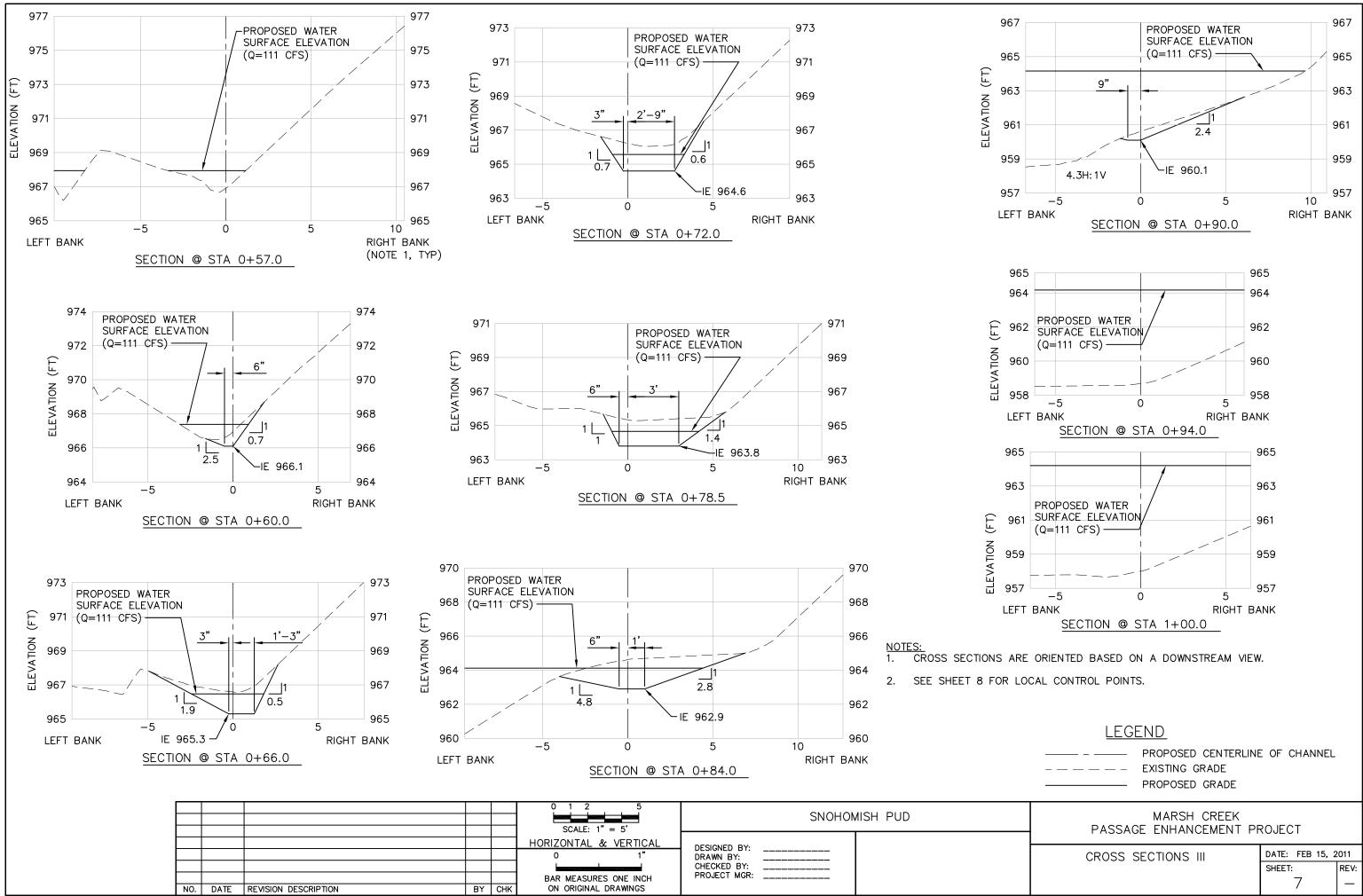
					0 5 10	SNOHON	MISH PUD	MARSH CREEK PASSAGE ENHANCEMENT P	PROJECT
					SCALE: 1" = 10' 0 1" BAR MEASURES ONE INCH	DESIGNED BY: DRAWN BY: CHECKED BY: PROJECT MGR:			DATE: FEB 15, 2011 SHEET: REV:
NO.	DATE	REVISION DESCRIPTION	BY	СНК	ON ORIGINAL DRAWINGS				3 –



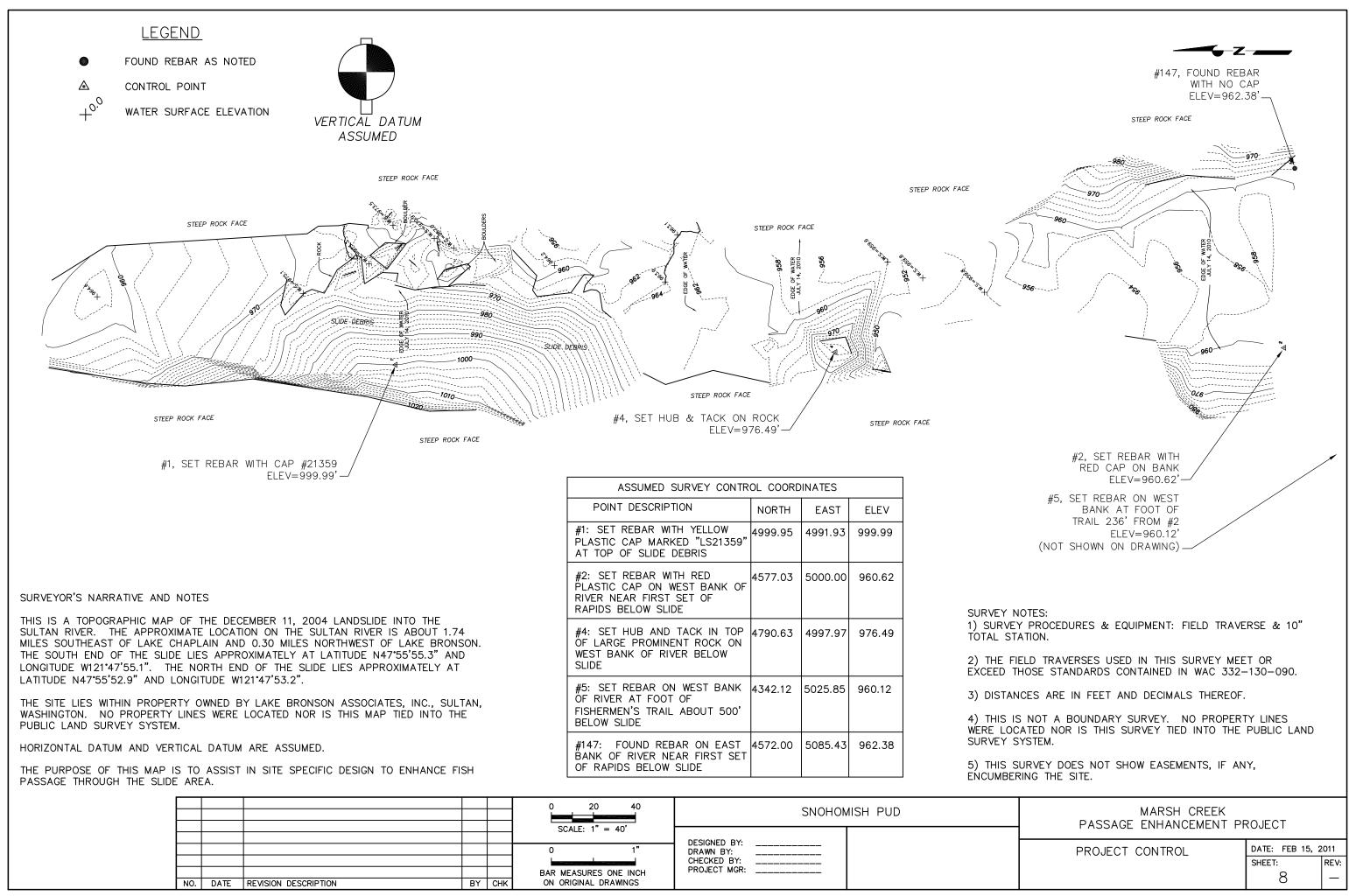
					0 5 10	SNOHOM	MISH PUD	MARSH CREEK	
					SCALE: 1" = 10'	311011		PASSAGE ENHANCEMENT P	'ROJECT
					0 1"	DESIGNED BY: DRAWN BY: CHECKED BY:		LONGITUDINAL PROFILE	DATE: FEB 15, 2011
NO.	DATE	REVISION DESCRIPTION	BY	СНК	BAR MEASURES ONE INCH ON ORIGINAL DRAWINGS	PROJECT MGR:			SHEET: REV: 4 —







Page Appendix 1-7



Appendix 2

Consultation Documentation

From: Presler, Dawn

Sent: Thursday, September 20, 2012 7:50 AM

To: 'Okeefe@americanwhitewater.org'; 'Jim Miller'; 'mick.matheson@ci.sultan.wa.us';

'steven.m.fransen@noaa.gov'; 'Leonetti, Frank'; 'Anne Savery'; 'tim_romanski@fws.gov';

'Loren Everest - USFS'; 'Maynard, Chris (ECY)'; 'Applegate, Brock A (DFW)'

Cc: Binkley, Keith; Moore, Kim

Subject:Jackson - draft MCS Modification Report - for your 30-day reviewAttachments:MCS Modification Report.docx; MCS_Appendix1_Drawings.pdf

Dear ARC Members:

Attached is the draft Marsh Creek Slide Modification Report. Please take the next 30 days to review and provide comments, if any, to me <u>by October 20, 2012</u>. If you have no comments on the report, please let me know that as well.

Thanks!

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

From: Maynard, Chris (ECY) [cmay461@ECY.WA.GOV]

Sent: Friday, September 21, 2012 1:54 PM

To: Presler, Dawn; 'Okeefe@americanwhitewater.org'; 'Jim Miller';

'mick.matheson@ci.sultan.wa.us'; 'steven.m.fransen@noaa.gov'; 'Leonetti, Frank'; 'Anne

Savery'; 'tim_romanski@fws.gov'; 'Loren Everest - USFS'; Applegate, Brock A (DFW)

Cc: Binkley, Keith; Moore, Kim

Subject: RE: Jackson - draft MCS Modification Report - for your 30-day review

Dawn,

The report looks good to me. I don't have anything to add.

Chris

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

1. FUTURE REPORTING

As indicated in Section 5 of the MCS Plan, the District will submit a report within six months of the sixth-year anniversary of the filing of this report (i.e. by May 2019). The report will document the results of the effectiveness of the initial rockslide modifications at improving fish passage, and include any proposals and anticipated costs for additional modifications to improve fish passage at the Marsh Creek rockslide. Any required future modifications will be funded by the Habitat Enhancement Account per the Fish Habitat Enhancement Plan. The report will be prepared after consultation with the ARC and include responses, based on project specific information, to any comments received.

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

Sent: Thursday, September 20, 2012 7:50 AM

To: 'Okeefe@americanwhitewater.org'; 'Jim Miller'; 'mick.matheson@ci.sultan.wa.us'; 'steven.m.fransen@noaa.gov'; 'Leonetti, Frank'; 'Anne Savery'; 'tim_romanski@fws.gov'; 'Loren Everest - USFS'; Maynard, Chris (ECY); Applegate, Brock A (DFW)

A (DI W)

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Thanks!

PUD No. 1 of Snohomish County PO Box 1107

From: Thomas O'Keefe [okeefe@americanwhitewater.org]

Sent: Saturday, September 22, 2012 5:44 PM

To: Presler, Dawn

Subject: Re: Jackson - draft MCS Modification Report - for your 30-day review

Looks good. Curious to test out navigability someday soon.

Thomas O'Keefe, PhD Pacific Northwest Stewardship Director American Whitewater 3537 NE 87th St Seattle, WA 98115

ph 425-417-9012

On Sep 20, 2012, at 7:50 AM, "Presler, Dawn" <DJPresler@SNOPUD.com> wrote:

Dear ARC Members:

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Thanks!

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

<MCS Modification Report.docx>

<MCS Appendix1 Drawings.pdf>

From: Everest, Loren -FS [leverest@fs.fed.us]
Sent: Monday, September 24, 2012 1:40 PM

To: Presler, Dawn

Subject: RE: Jackson - draft MCS Modification Report - for your 30-day review

This report looks good to me.



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

Sent: Thursday, September 20, 2012 7:50 AM

To: okeefe@americanwhitewater.org; 'Jim Miller'; 'mick.matheson@ci.sultan.wa.us'; 'steven.m.fransen@noaa.gov'; 'Leonetti, Frank'; 'Anne Savery'; 'tim_romanski@fws.gov'; Everest, Loren -FS; 'Maynard, Chris (ECY)'; 'Applegate, Brock A (DFW)'

Cc: Binkley, Keith; Moore, Kim

Subject: Jackson - draft MCS Modification Report - for your 30-day review

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Thanks!

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

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From: Presler, Dawn

Sent: Thursday, October 25, 2012 9:28 AM

To: 'Applegate, Brock A (DFW)'; 'Okeefe@americanwhitewater.org'; 'Jim Miller';

'mick.matheson@ci.sultan.wa.us'; 'steven.m.fransen@noaa.gov'; 'Leonetti, Frank'; 'Anne

Savery'; 'tim romanski@fws.gov'; 'Loren Everest - USFS'; Maynard, Chris (ECY)

Binkley, Keith; Moore, Kim; Bails, Jamie L (DFW)

Subject: RE: Jackson Hydroproject- draft Marsh Creek Slide Modification Report - for your 30-day

review

Hi Brock,

Cc:

Since this is a one-time report of modification methods, listing the results of the escapement surveys would be better served and already included in the Fisheries and Habitat Monitoring Plan (FHMP) annual reporting. The FHMP annual report will provide the broader context results of monitoring (all index areas of the Sultan River and side channels) rather than just the confined area at MCS. The focus of the MCS Modification Report is "within 6 months of completing the modifications...the District will file a report with FERC detailing what methods were used to modify the slide." However, I will put a sentence in the MCS report referencing the reader to the escapement data which is identified in the FHMP annual report.

Dawn

From: Applegate, Brock A (DFW) [mailto:Brock.Applegate@dfw.wa.gov]

Sent: Friday, October 19, 2012 4:19 PM

To: Presler, Dawn; 'Okeefe@americanwhitewater.org'; 'Jim Miller'; 'mick.matheson@ci.sultan.wa.us';

'steven.m.fransen@noaa.gov'; 'Leonetti, Frank'; 'Anne Savery'; 'tim_romanski@fws.gov'; 'Loren Everest - USFS'; Maynard, Chris (ECY)

Cc: Binkley, Keith; Moore, Kim; Bails, Jamie L (DFW)

Subject: RE: Jackson Hydroproject- draft Marsh Creek Slide Modification Report - for your 30-day review

Hi Dawn, Would this be a good report to list the fish/redd survey results in the reach above Marsh Creek Slide? I am mainly asking this question because A-LA 2: Marsh Creek Slide Modification and Monitoring asks for "(5) the method and schedule for monitoring fish use and escapement upstream of the Marsh Creek Slide on an annual basis throughout the license term," in the Marsh Creek Slide Plan. I recommend this information gets added to the plan.

Thanks for asking for our review.

Sincerely, Brock

Brock Applegate
Major Projects Mitigation Biologist
Washington Department of Fish and Wildlife
16018 Mill Creek Boulevard
Mill Creek, WA 98012-1541

(425) 775-1311 x310

(360) 789-0578 (cell)

(425) 338-1066 (fax)

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

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To: 'Okeefe@americanwhitewater.org'; 'Jim Miller'; 'mick.matheson@ci.sultan.wa.us'; 'steven.m.fransen@noaa.gov'; 'Leonetti, Frank'; 'Anne Savery'; 'tim_romanski@fws.gov'; 'Loren Everest - USFS'; Maynard, Chris (ECY); Applegate, Brock

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Thanks!

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

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

Appendix 3

Response to Comments

No.	Comment:	Response:
1	WA Department of Ecology, 9/21/2012 The report looks good to me. I don't have anything to add.	-
2	American Whitewater, 9/22/2012 Looks good. Curious to test out navigability someday soon.	-
3	U.S. Forest Service, 9/24/2012 This report looks good to me.	-
4	WA Department of Fish and Wildlife, 10/19/2012 Would this be a good report to list the fish/redd survey results in the reach above Marsh Creek Slide? I am mainly asking this question because A-LA 2: Marsh Creek Slide Modification and Monitoring asks for "(5) the method and schedule for monitoring fish use and escapement upstream of the Marsh Creek Slide on an annual basis throughout the license term," in the Marsh Creek Slide Plan. I recommend this information gets added to the plan. Thanks for asking for our review.	Since this is a one-time report of modification methods, listing the results of the escapement surveys would be better served and already included in the Fisheries and Habitat Monitoring Plan (FHMP) annual reporting. The FHMP annual report will provide the broader context results of monitoring (all index areas of the Sultan River and side channels) rather than just the confined area at MCS. The focus of the MCS Modification Report is "within 6 months of completing the modificationsthe District will file a report with FERC detailing what methods were used to modify the slide." However, I will put a sentence in the MCS report referencing the reader to the escapement data which is identified in the FHMP annual report. Added sentence to Section 4.