

November 19, 2014

VIA ELECTRONIC FILING

Kimberly D. Bose, 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 - Updated
License Article 407**

Dear Secretary Bose:

Enclosed in Public Utility District No. 1 of Snohomish County's Operation Compliance Monitoring Plan Annual Report for the Water Year July 2013 – June 2014 pursuant to License Article 407 for the Jackson Hydroelectric Project. This report has been updated from the version filed with the Commission on October 31, 2014, to fix formatting errors during the Adobe PDF conversion and add an additional consultation comment from the Tulalip Tribes, along with the District's response to that comment.

If you have any questions on the report, please contact Dawn Presler, Sr. Environmental Coordinator, at (425) 783-1709 or DJPresler@snopud.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig W. Collar", is positioned below the "Sincerely," text.

Craig W. Collar, P.E.
Assistant General Manager of Generation
CWCollar@snopud.com
(425) 783-1825

Enclosed: OCMP Annual Report

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

Operation Compliance Monitoring Plan
(License Article 407)

**Annual Report for Water Year
July 2013 – June 2014**



Prepared By:



Everett, WA

October 2014

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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
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 2013 – June 2014.

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 review and comment period.

Spada Lake Reservoir data in tabular format are included in Appendix 1. Consultation with the ARC is included in Appendix 2

2. PROCESS FLOWS

The District provided process flow events pursuant to the PF Plan on four occasions during the July 2013 – June 2014 timeframe to serve multiple habitat benefits. These included, in chronological order, a scheduled fall event for flushing surficial fine sediment from the streambed and to stimulate the upstream migration of spawning adults, a channel maintenance event during March 2014, and two scheduled events during spring to aid in flushing of fine sediment to assist the outmigration of juvenile fish. The process flow events for the Sultan River are summarized below in Table 1 for each reach; reaches are identified in Figure 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 10.

Table 1. Process Flow Log, July 2013 - June 2014.

Date ¹	Time ²	Magnitude ³ (cfs)	Duration ⁴ (hours)	Accretion ⁵ (cfs)	Notes ⁶	Counts as PF Type ⁷
9/16/2013	1215 to 0230 (9/17)	R1 – 1,350 (average)	14.5			F, U
9/24/2013	2245 to 1000 (9/25)	R2 – 543 (average)	11.25			F, U
9/24/2013	2100 to 1030 (9/25)	R3 – 514 (average)	13.75			F
3/16/2014	1215 to 1500 (3/17)	R1 – 4,508 (average)	26.75	R1- cumulative accretion (including spill), measured at Powerhouse: 1,100 to 2,000 cfs	Full operational release sequenced with reservoir spill, 5.7" of rainfall in 24 hour period between 3/15/14 (2200 HR) and 3/16/14 (2100 HR)	FO
4/1/2014	0000 to 2245 (4/4)	R1 – 1,722 (average)	94.75			FL, O
4/17/2014	0400 to 0630 (4/18)	R3 & R2 – 486 (average)	26.5			FL, O
4/17/2014	0615 to 1500	R1 – 1,649	8.75			O
5/21/2014	0615 to 1300	R2- 690	6.75			O
5/21/2014	0630 to 1315	R1 – 2,000	6.75			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 (F), Outmigration (O), Upmigration (U) as defined in the PF Plan

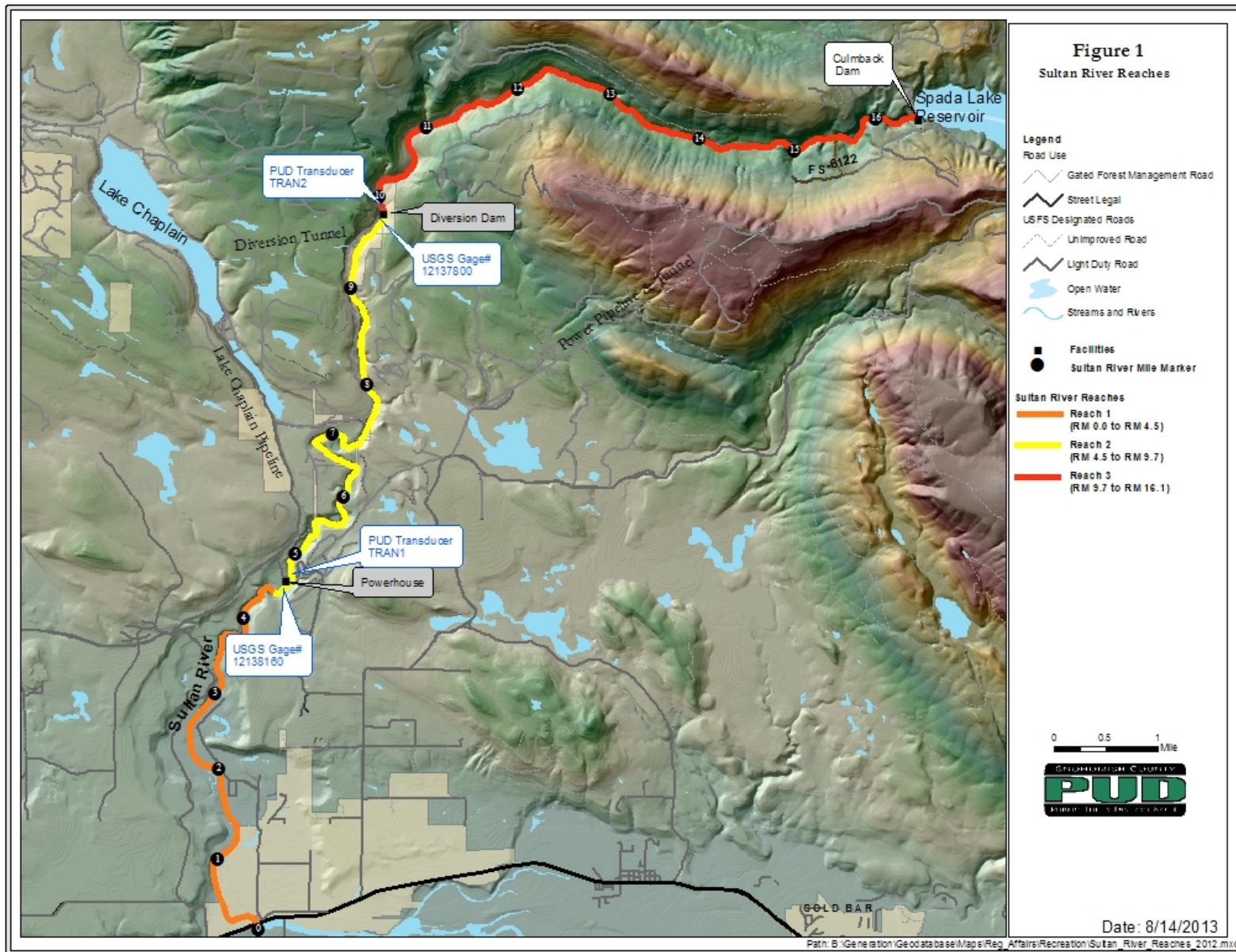


Figure 1. Sultan River reaches.

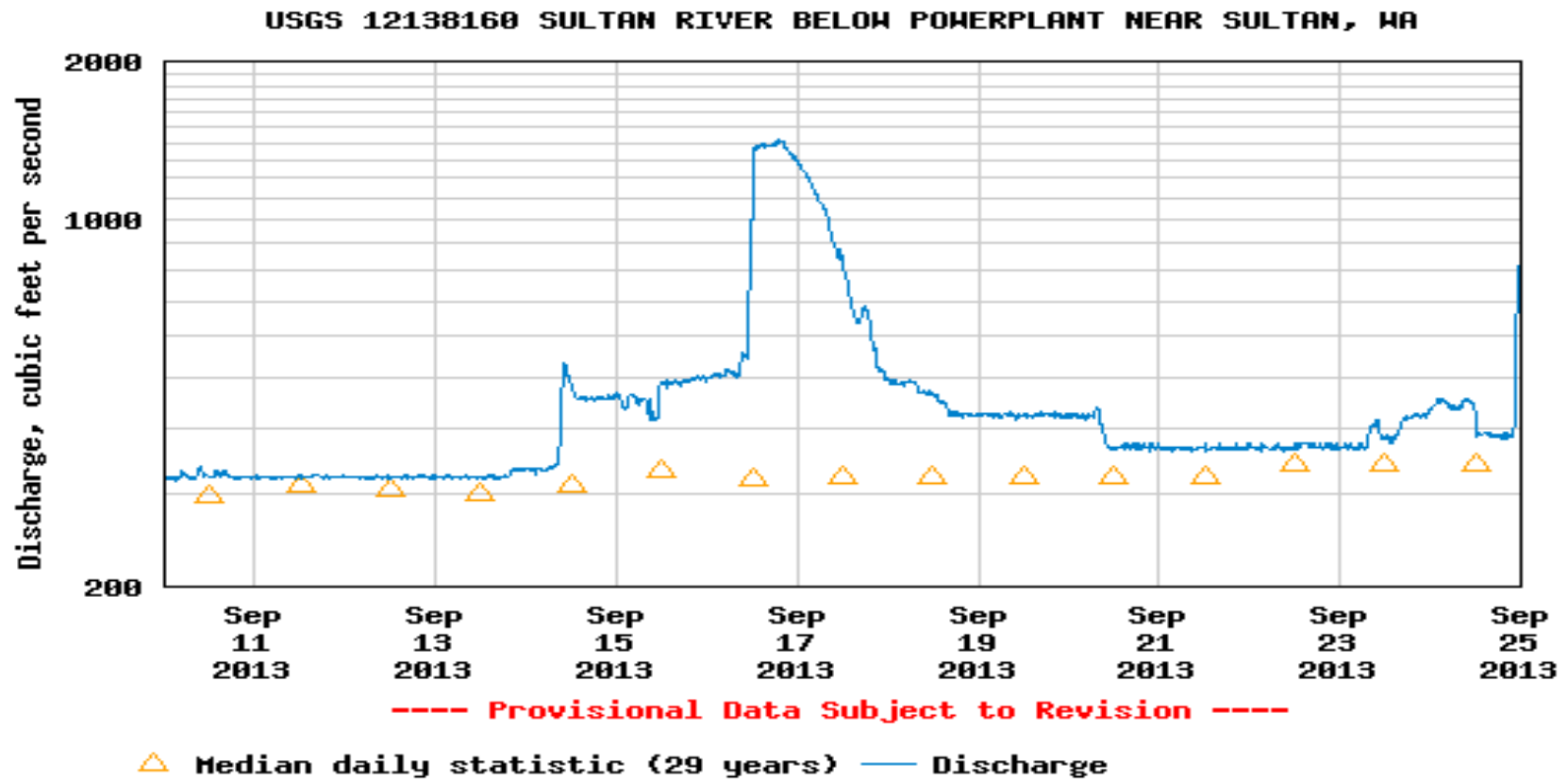


Figure 2. Sultan River below Powerplant hydrograph – 9/10/2013 to 9/24/2013

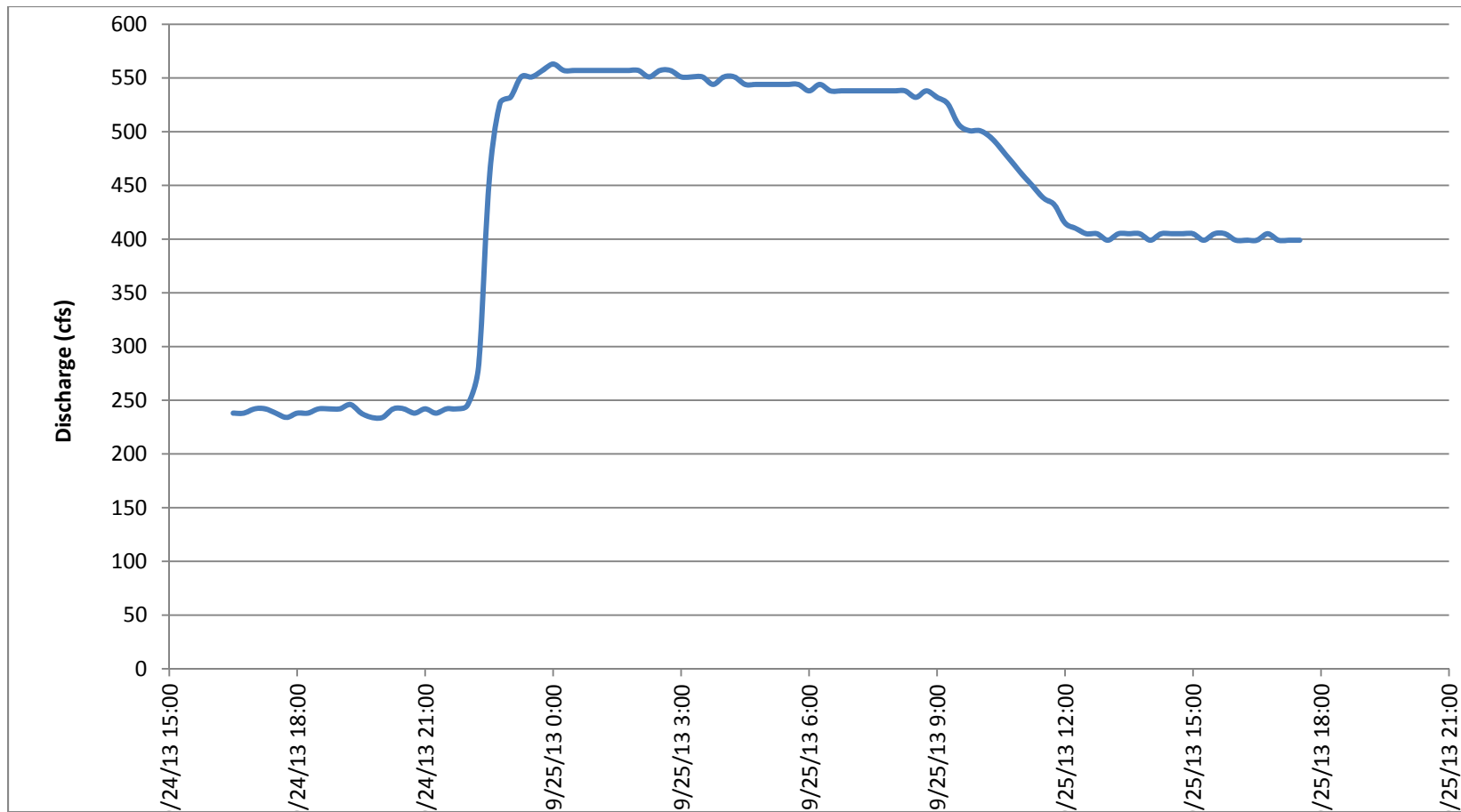


Figure 3. Sultan River immediately upstream of Powerhouse at RM 4.7 hydrograph – 9/24/2013 to 9/25/2013

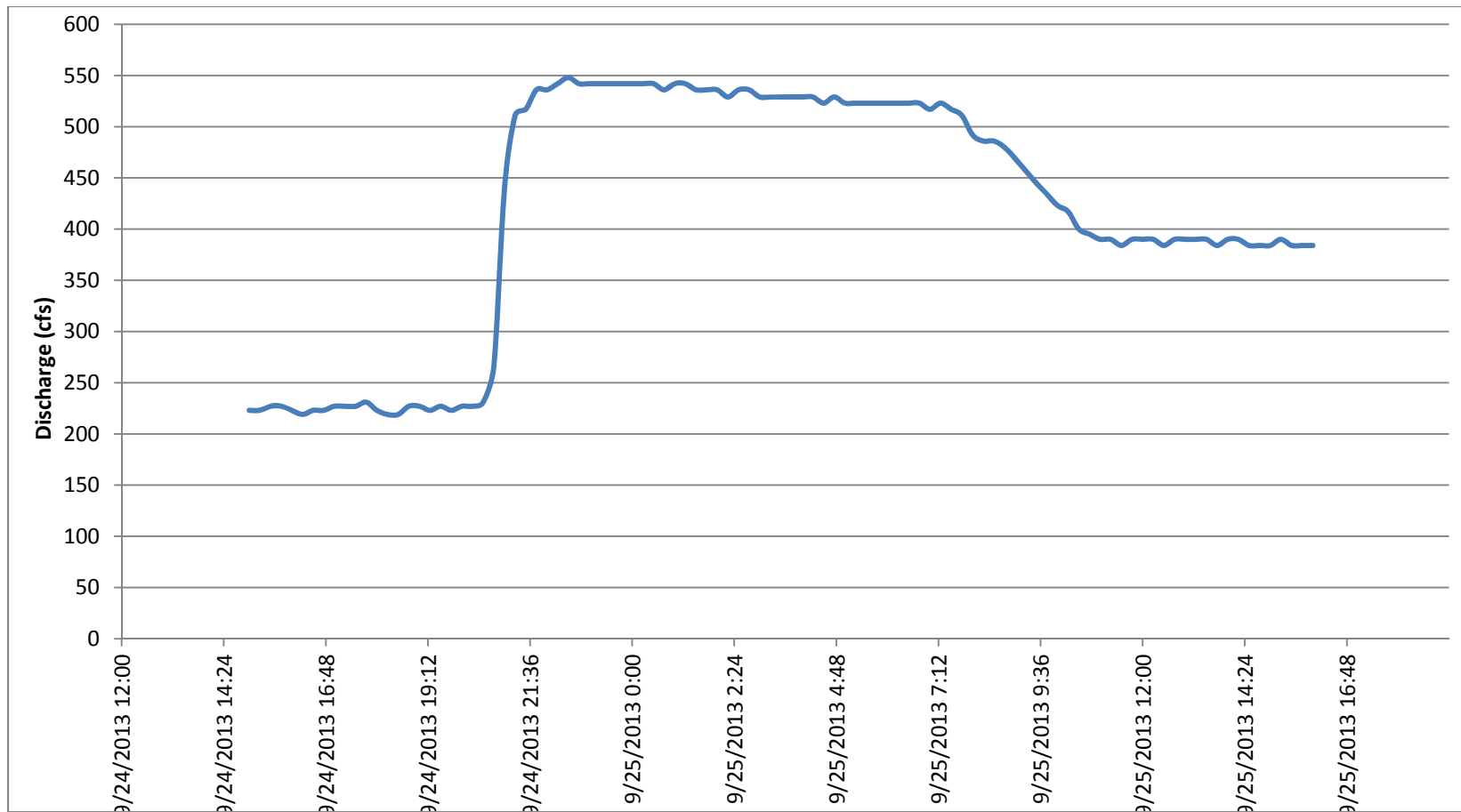


Figure 4. Sultan River, immediately upstream of Diversion Dam at RM 9.8 hydrograph, - 9/24/2013 to 9/25/2013

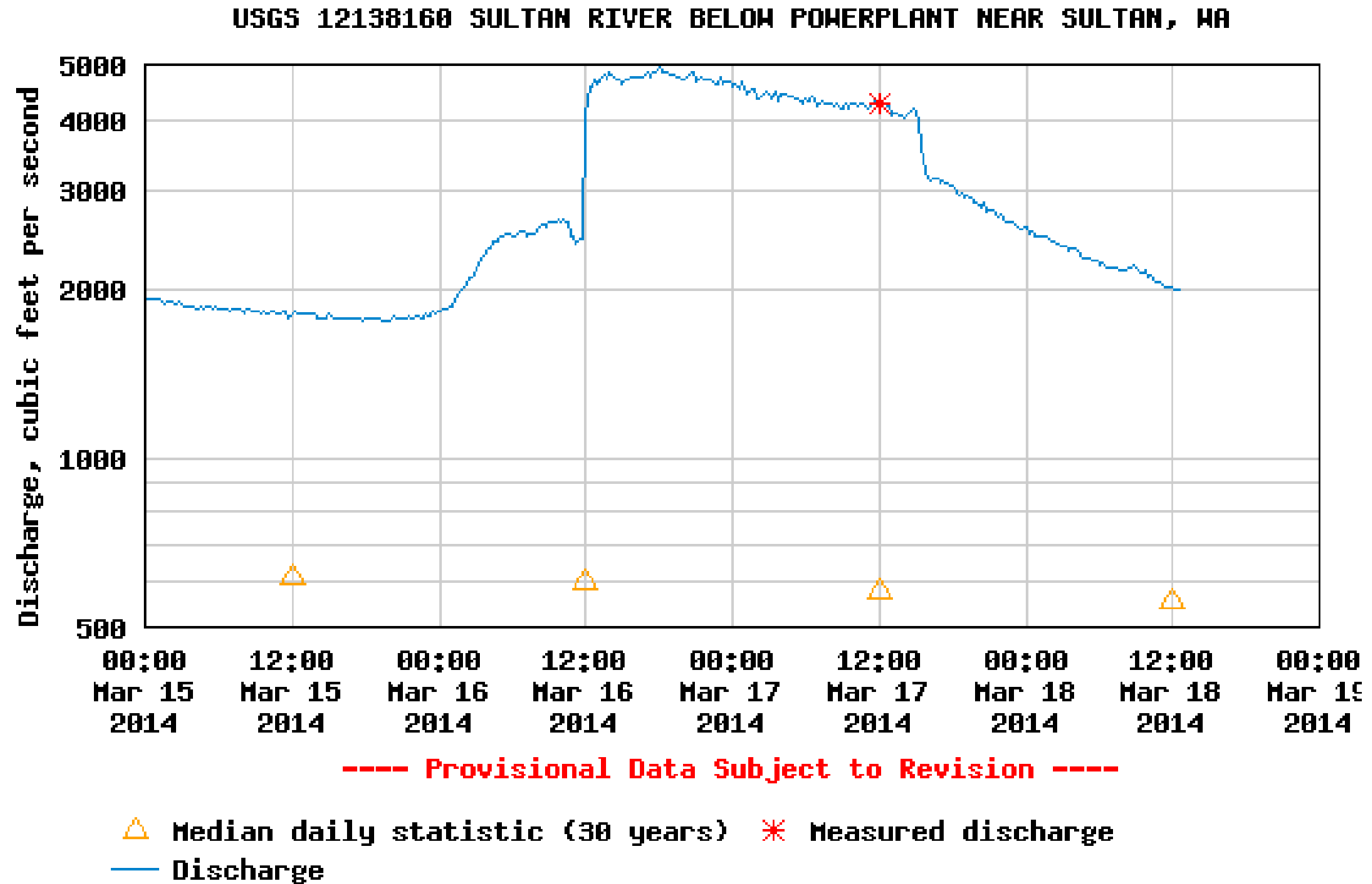


Figure 5. Sultan River below Powerplant hydrograph – 3/16/2014 to 3/17/2014

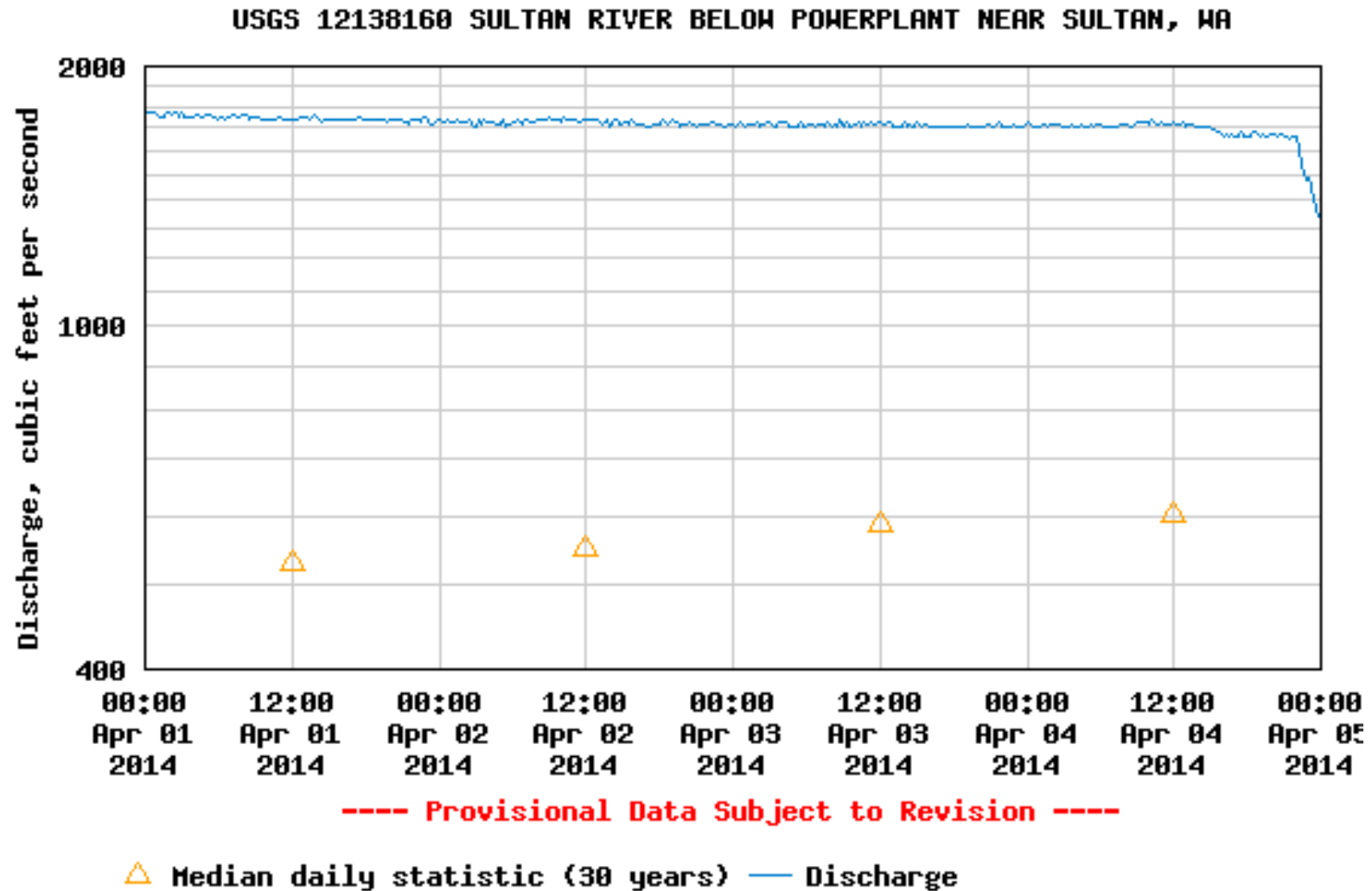


Figure 6. Sultan River below Powerplant hydrograph – 4/01/2014 to 4/04/2014

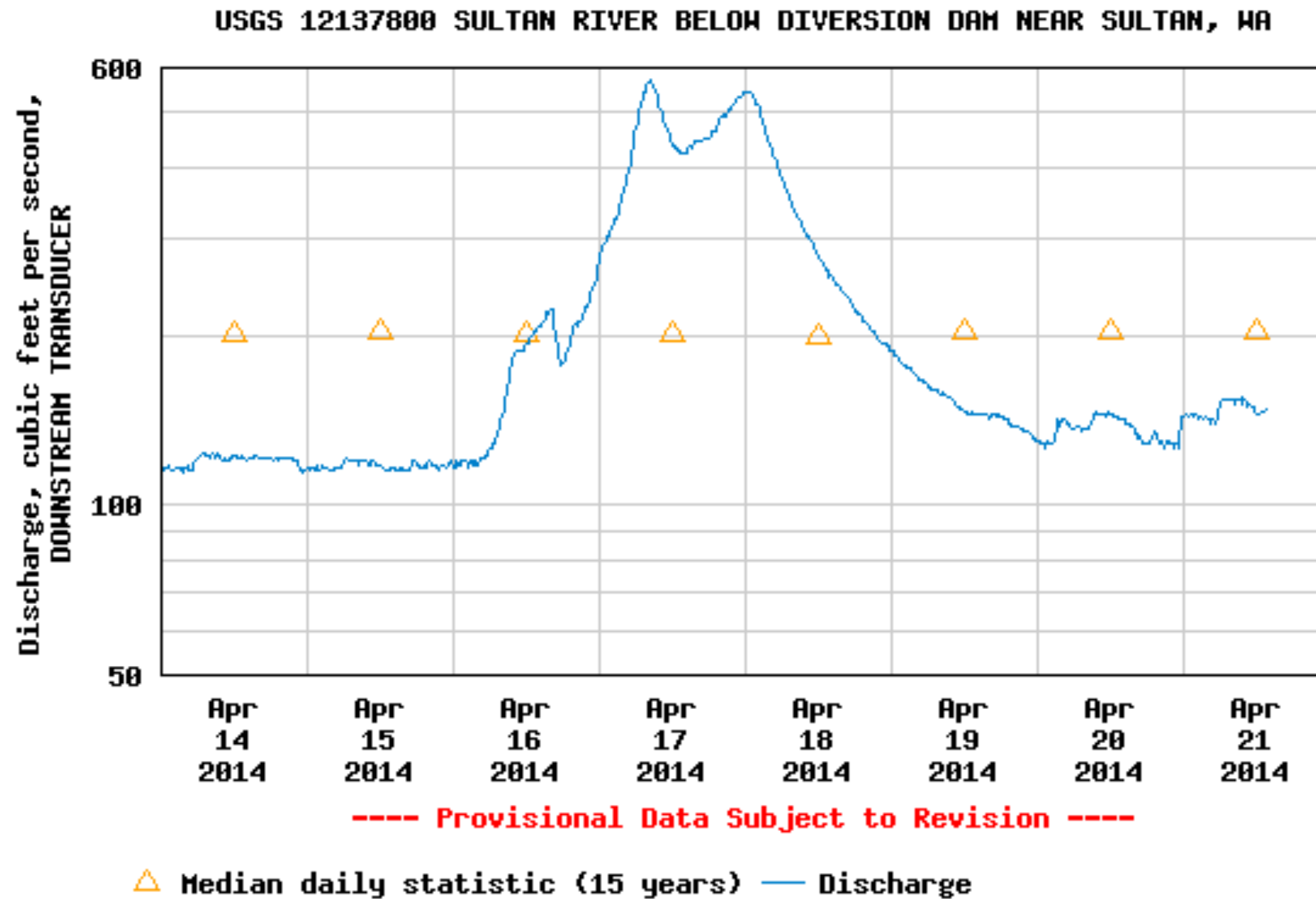


Figure 7. Sultan River below Diversion Dam hydrograph – 4/14/2014 to 4/21/2014

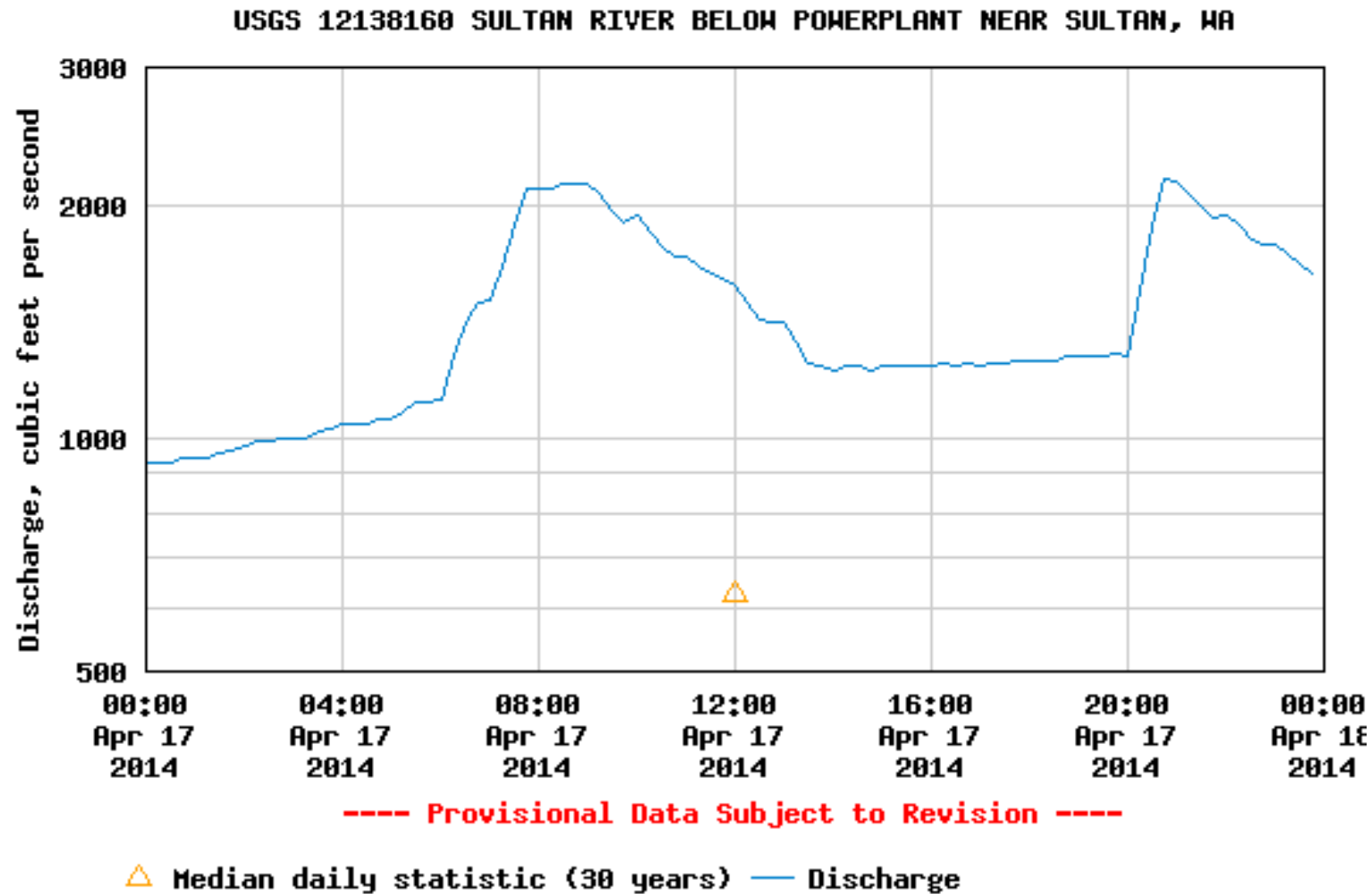


Figure 8. Sultan River below Powerplant hydrograph – 4/17/2014

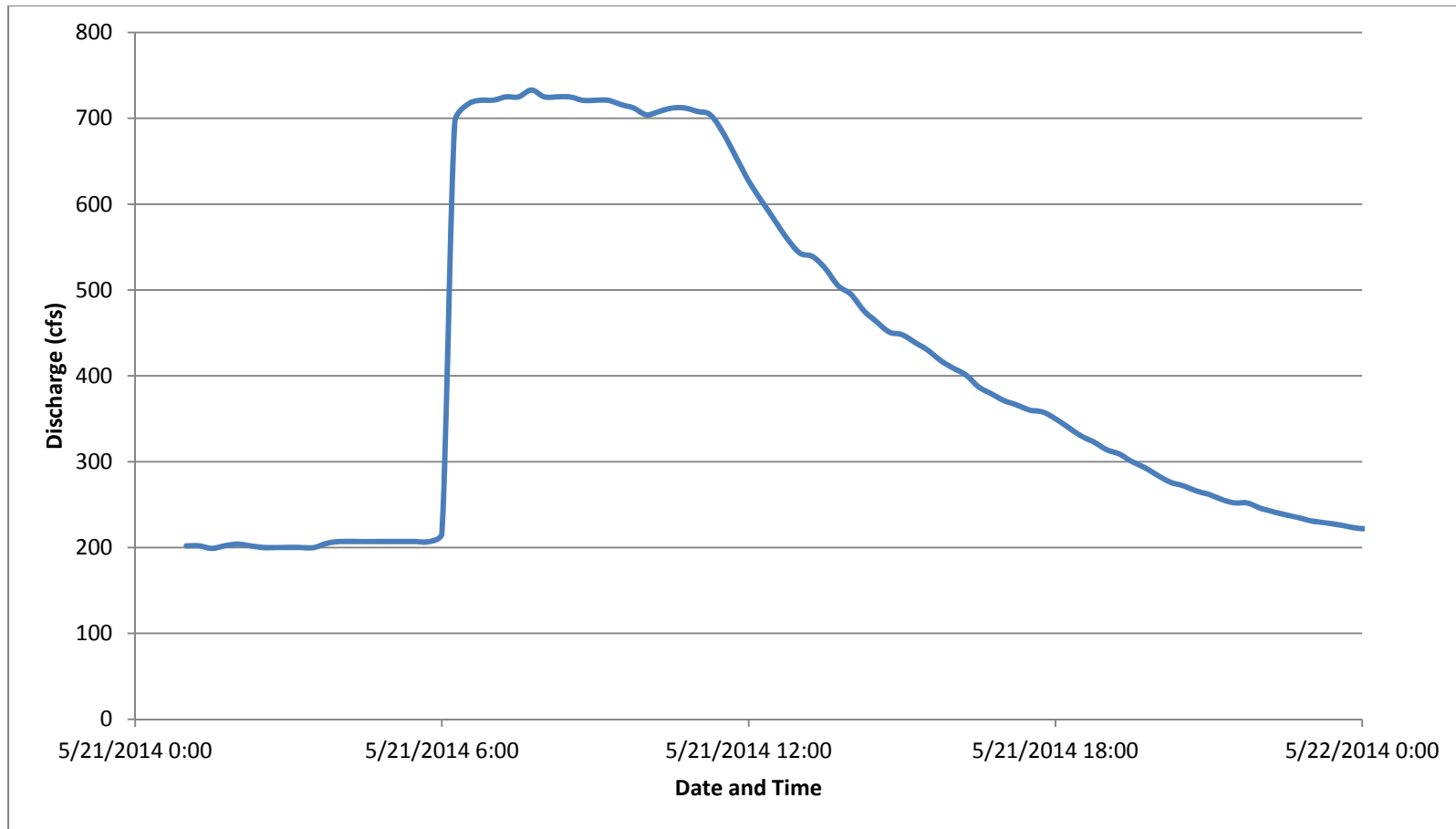


Figure 9. Sultan River immediately upstream of Powerhouse at RM 4.7 – 5/21/2014

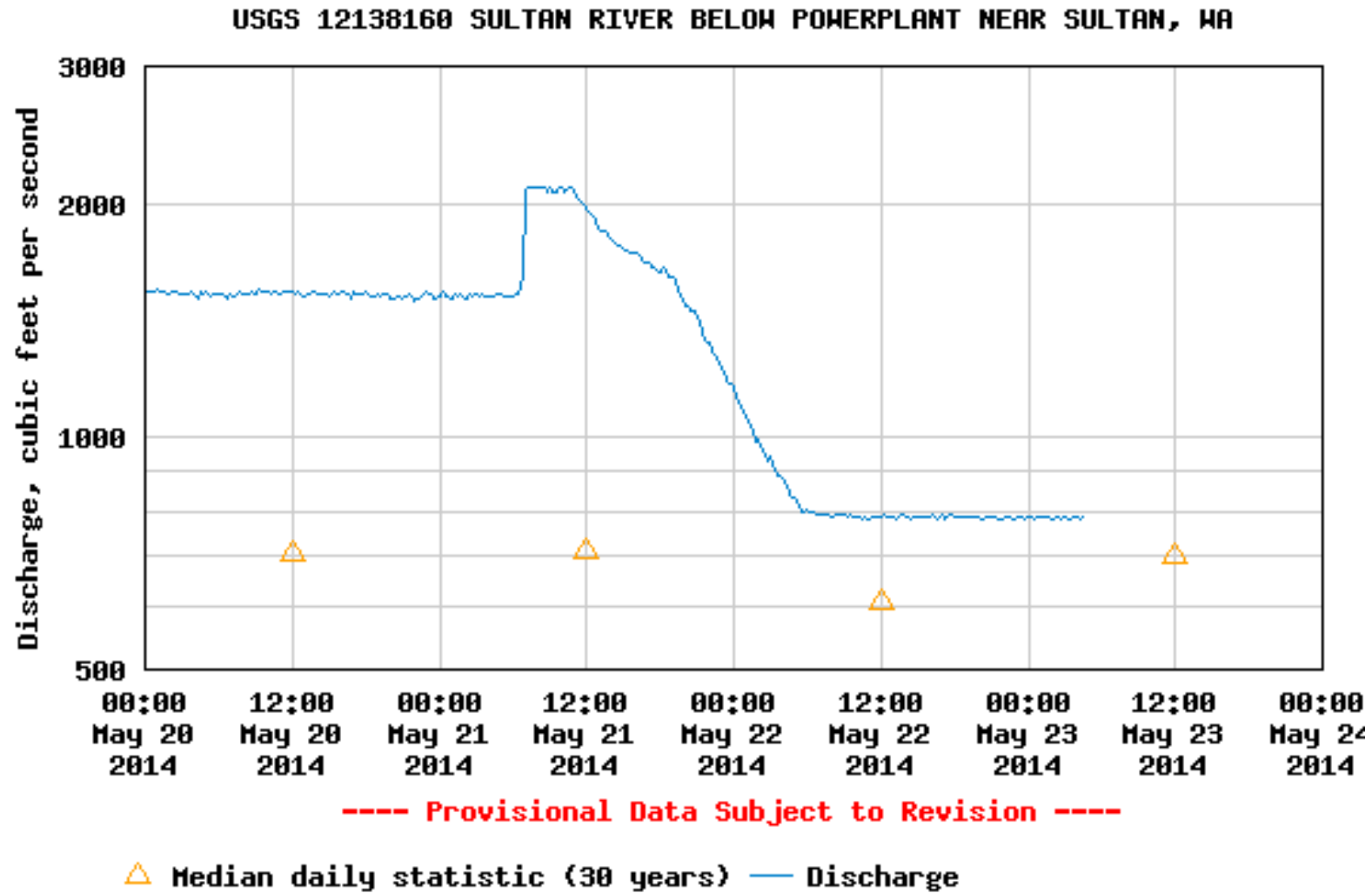


Figure 10. Sultan River below Powerplant hydrograph – 5/21/2014

3. SPADA LAKE RESERVOIR WATER SURFACE ELEVATIONS

During this reporting period, Spada Lake Reservoir mean daily water surface elevations ranged between 1,416.1 and 1,450.2 feet msl, with the low occurring on September 22 and the high March 16. Figure 11 displays the mean daily water surface elevations of Spada Lake Reservoir, and Appendix 1 contains the data in tabular format.

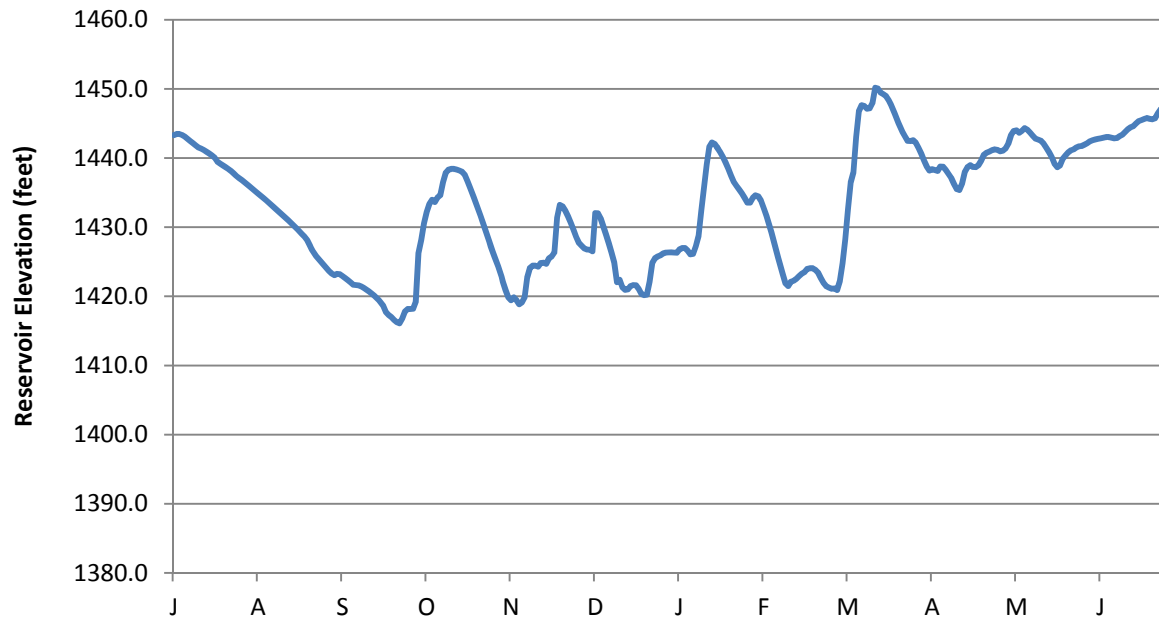


Figure 11. Mean daily water surface elevation, Spada Reservoir, July 1, 2013 - June 30, 2014.

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

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

No deviations to the FERC-prescribed target elevations occurred when the Spada Lake Reservoir was in State 3.

Appendix 1

Spada Lake Reservoir Mean Daily Elevations Tabular Format

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
7/1	1443.3		8/1	1434.9		9/1	1422.9
7/2	1443.5		8/2	1434.5		9/2	1422.7
7/3	1443.5		8/3	1434.2		9/3	1422.4
7/4	1443.3		8/4	1433.9		9/4	1422.0
7/5	1443.1		8/5	1433.5		9/5	1421.7
7/6	1442.8		8/6	1433.2		9/6	1421.6
7/7	1442.5		8/7	1432.8		9/7	1421.6
7/8	1442.2		8/8	1432.4		9/8	1421.4
7/9	1441.8		8/9	1432.1		9/9	1421.2
7/10	1441.5		8/10	1431.7		9/10	1420.9
7/11	1441.4		8/11	1431.4		9/11	1420.6
7/12	1441.2		8/12	1431.0		9/12	1420.3
7/13	1440.9		8/13	1430.7		9/13	1420.0
7/14	1440.7		8/14	1430.3		9/14	1419.6
7/15	1440.4		8/15	1429.9		9/15	1419.1
7/16	1440.1		8/16	1429.5		9/16	1418.6
7/17	1439.5		8/17	1429.0		9/17	1417.7
7/18	1439.2		8/18	1428.6		9/18	1417.3
7/19	1438.9		8/19	1428.1		9/19	1417.0
7/20	1438.7		8/20	1427.3		9/20	1416.6
7/21	1438.4		8/21	1426.6		9/21	1416.3
7/22	1438.1		8/22	1426.0		9/22	1416.1
7/23	1437.8		8/23	1425.5		9/23	1416.8
7/24	1437.4		8/24	1425.0		9/24	1417.8
7/25	1437.1		8/25	1424.6		9/25	1418.2
7/26	1436.8		8/26	1424.1		9/26	1418.2
7/27	1436.5		8/27	1423.7		9/27	1418.2
7/28	1436.2		8/28	1423.3		9/28	1419.2
7/29	1435.8		8/29	1423.1		9/29	1426.3
7/30	1435.5		8/30	1423.3		9/30	1428.2
7/31	1435.2		8/31	1423.2			

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
10/1	1430.6		11/1	1419.8		12/1	1426.5
10/2	1432.2		11/2	1419.4		12/2	1432.0
10/3	1433.4		11/3	1419.8		12/3	1432.0
10/4	1434.0		11/4	1419.5		12/4	1431.3
10/5	1433.6		11/5	1418.9		12/5	1430.1
10/6	1434.3		11/6	1419.1		12/6	1428.9
10/7	1434.6		11/7	1419.9		12/7	1427.7
10/8	1436.5		11/8	1422.7		12/8	1426.3
10/9	1437.9		11/9	1424.1		12/9	1424.9
10/10	1438.3		11/10	1424.4		12/10	1422.1
10/11	1438.4		11/11	1424.4		12/11	1422.4
10/12	1438.4		11/12	1424.3		12/12	1421.3
10/13	1438.3		11/13	1424.8		12/13	1420.9
10/14	1438.2		11/14	1424.9		12/14	1421.0
10/15	1438.0		11/15	1424.7		12/15	1421.5
10/16	1437.6		11/16	1425.5		12/16	1421.6
10/17	1436.7		11/17	1425.8		12/17	1421.6
10/18	1435.7		11/18	1426.4		12/18	1421.1
10/19	1434.6		11/19	1431.4		12/19	1420.3
10/20	1433.6		11/20	1433.2		12/20	1420.2
10/21	1432.5		11/21	1433.0		12/21	1420.2
10/22	1431.4		11/22	1432.4		12/22	1422.1
10/23	1430.3		11/23	1431.6		12/23	1424.8
10/24	1429.1		11/24	1430.7		12/24	1425.5
10/25	1428.0		11/25	1429.7		12/25	1425.8
10/26	1426.8		11/26	1428.6		12/26	1425.9
10/27	1425.6		11/27	1427.7		12/27	1426.2
10/28	1424.6		11/28	1427.3		12/28	1426.3
10/29	1423.5		11/29	1426.9		12/29	1426.4
10/30	1422.1		11/30	1426.8		12/30	1426.4
10/31	1420.9			1426.7		12/31	1426.3

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
1/1	1426.3		2/1	1433.8		3/1	1420.9
1/2	1426.8		2/2	1432.8		3/2	1422.2
1/3	1427.0		2/3	1431.7		3/3	1424.8
1/4	1427.0		2/4	1430.4		3/4	1428.2
1/5	1426.6		2/5	1429.0		3/5	1432.6
1/6	1426.1		2/6	1427.5		3/6	1436.5
1/7	1426.1		2/7	1426.1		3/7	1437.9
1/8	1427.3		2/8	1424.6		3/8	1443.1
1/9	1428.7		2/9	1423.2		3/9	1445.0
1/10	1432.4		2/10	1421.9		3/10	1446.8
1/11	1435.7		2/11	1421.5		3/11	1447.6
1/12	1439.1		2/12	1422.1		3/12	1447.5
1/13	1441.6		2/13	1422.3		3/13	1447.1
1/14	1442.2		2/14	1422.5		3/14	1447.2
1/15	1442.0		2/15	1422.9		3/15	1448.0
1/16	1441.5		2/16	1423.3		3/16	1450.2
1/17	1440.9		2/17	1423.5		3/17	1450.1
1/18	1440.2		2/18	1424.0		3/18	1449.5
1/19	1439.4		2/19	1424.1		3/19	1449.2
1/20	1438.4		2/20	1424.1		3/20	1449.0
1/21	1437.5		2/21	1423.8		3/21	1448.4
1/22	1436.6		2/22	1423.4		3/22	1447.6
1/23	1436.0		2/23	1422.6		3/23	1446.6
1/24	1435.4		2/24	1422.0		3/24	1445.6
1/25	1434.9		2/25	1421.5		3/25	1444.7
1/26	1434.2		2/26	1421.3		3/26	1443.9
1/27	1433.6		2/27	1421.1		3/27	1443.1
1/28	1433.5		2/28	1421.1		3/28	1442.5
1/29	1434.3					3/29	1442.5
1/30	1434.6					3/30	1442.6
1/31	1434.5					3/31	1442.2

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
4/1	1441.5		5/1	1441.0		6/1	1441.9
4/2	1440.6		5/2	1441.1		6/2	1442.1
4/3	1439.7		5/3	1441.4		6/3	1442.4
4/4	1438.8		5/4	1442.1		6/4	1442.6
4/5	1438.2		5/5	1443.3		6/5	1442.7
4/6	1438.4		5/6	1443.9		6/6	1442.8
4/7	1438.3		5/7	1444.0		6/7	1442.9
4/8	1438.1		5/8	1443.7		6/8	1442.9
4/9	1438.8		5/9	1443.9		6/9	1443.0
4/10	1438.8		5/10	1444.3		6/10	1443.0
4/11	1438.3		5/11	1444.1		6/11	1442.9
4/12	1437.7		5/12	1443.7		6/12	1442.8
4/13	1437.1		5/13	1443.2		6/13	1442.9
4/14	1436.3		5/14	1442.8		6/14	1443.2
4/15	1435.5		5/15	1442.7		6/15	1443.4
4/16	1435.4		5/16	1442.5		6/16	1443.8
4/17	1436.3		5/17	1442.1		6/17	1444.2
4/18	1438.0		5/18	1441.5		6/18	1444.5
4/19	1438.7		5/19	1440.8		6/19	1444.6
4/20	1439.0		5/20	1440.1		6/20	1445.0
4/21	1438.7		5/21	1439.2		6/21	1445.3
4/22	1438.7		5/22	1438.7		6/22	1445.5
4/23	1439.0		5/23	1438.9		6/23	1445.6
4/24	1439.6		5/24	1439.9		6/24	1445.8
4/25	1440.5		5/25	1440.4		6/25	1445.7
4/26	1440.8		5/26	1440.8		6/26	1445.6
4/27	1440.9		5/27	1441.1		6/27	1445.7
4/28	1441.1		5/28	1441.3		6/28	1446.5
4/29	1441.3		5/29	1441.5		6/29	1447.0
4/30	1441.2		5/30	1441.7		6/30	1447.2
			5/31	1441.7			

Appendix 2

Consultation Documentation

Presler, Dawn

From: Presler, Dawn
Sent: Tuesday, October 07, 2014 3:45 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us); Anne Savery; 'Maynard, Chris (ECY)' (cmay461@ecy.wa.gov); 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'Leonetti, Frank' (frank.leonetti@snoco.org); Mick Matheson; 'Jim Miller' (JMiller@ci.everett.wa.us); Tom O'Keefe
Subject: JHP (FERC No. 2157) - OCMP for your review by Oct 30
Attachments: OCMP Annual Report 2014.docx

Dear ARC,
Attached is the draft Operations Compliance Monitoring Plan for 2013-2014 for the Jackson Project. It's pretty short so we're hoping to get your input back by October 30 to meet the November 1 deadline to FERC. Please let me know if you do need the full 30 days for review. If you have no comments on the draft, an email stating so would be appreciated.

Thanks for your review.

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

Public Utility District No. 1 of Snohomish County
PO Box 1107
Everett, WA 98206-1107

Presler, Dawn

From: Presler, Dawn
Sent: Monday, October 27, 2014 4:24 PM
To: 'Applegate, Brock A (DFW)'
Subject: RE: Jackson Hydroproject-- Comments for Operation Compliance Monitoring Report for your review by Oct 30

Thanks for the reply! Have a great week.

Dawn

From: Applegate, Brock A (DFW) [mailto:Brock.Applegate@dfw.wa.gov]
Sent: Monday, October 27, 2014 3:42 PM
To: Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us); Anne Savery; Maynard, Chris (ECY); 'Leonetti, Frank' (frank.leonetti@snoco.org); Mick Matheson; 'Jim Miller' (JMiller@ci.everett.wa.us); Tom O'Keefe
Cc: Whitney, Jennifer L (DFW); Bails, Jamie L (DFW); Allegro, Justin K (DFW); Beecher, Hal (DFW)
Subject: Jackson Hydroproject-- Comments for Operation Compliance Monitoring Report for your review by Oct 30

Hi Dawn, WDFW have reviewed the Annual Report and we have no comments.

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: Tuesday, October 07, 2014 3:45 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us); Anne Savery; Maynard, Chris (ECY); Applegate, Brock A (DFW); 'Leonetti, Frank' (frank.leonetti@snoco.org); Mick Matheson; 'Jim Miller' (JMiller@ci.everett.wa.us); Tom O'Keefe
Subject: JHP (FERC No. 2157) - OCMP for your review by Oct 30

Dear ARC,
Attached is the draft Operations Compliance Monitoring Plan for 2013-2014 for the Jackson Project. It's pretty short so we're hoping to get your input back by October 30 to meet the November 1 deadline to FERC. Please let me know if you do need the full 30 days for review. If you have no comments on the draft, an email stating so would be appreciated.

Thanks for your review.

Dawn Presler
Sr. Environmental Coordinator

Presler, Dawn

From: Presler, Dawn
Sent: Wednesday, October 15, 2014 2:33 PM
To: 'Maynard, Chris (ECY)'
Subject: RE: JHP (FERC No. 2157) - OCMP for your review by Oct 30

Thanks for the email!

Dawn

From: Maynard, Chris (ECY) [mailto:cmay461@ecy.wa.gov]
Sent: Wednesday, October 15, 2014 2:02 PM
To: Presler, Dawn
Subject: RE: JHP (FERC No. 2157) - OCMP for your review by Oct 30

I have no comments on the draft

From: Presler, Dawn [mailto:DJPresler@SNOPUD.com]
Sent: Tuesday, October 07, 2014 3:45 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us); Anne Savery; Maynard, Chris (ECY); Applegate, Brock A (DFW); 'Leonetti, Frank' (frank.leonetti@snoco.org); Mick Matheson; 'Jim Miller' (JMiller@ci.everett.wa.us); Tom O'Keefe
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Dawn Presler
Sr. Environmental Coordinator
Generation Resources
(425) 783-1709

Public Utility District No. 1 of Snohomish County
PO Box 1107
Everett, WA 98206-1107

Presler, Dawn

From: Anne Savery <asavery@tulaliptribes-nsn.gov>
Sent: Thursday, October 09, 2014 10:54 AM
To: Binkley, Keith; Presler, Dawn
Subject: RE: JHP (FERC No. 2157) - OCMP for your review by Oct 30

Right, I understand about preserving options. I just want to be able to go on record with the Tribes' perspective about CM versus CF flows and I was expecting you to call this a CF flow at this point. I'll just make my comments and hopefully they will turn into an anachronism this year.

Thanks for the clarification.

Anne

From: Binkley, Keith [KMBinkley@SNOPUD.com]
Sent: Wednesday, October 08, 2014 3:01 PM
To: Anne Savery; Presler, Dawn
Subject: RE: JHP (FERC No. 2157) - OCMP for your review by Oct 30

Hi Anne - I'll chime in here. We are preserving our options as to how to label that event. By doing the resurvey etc., it gives us the option to call it either maintenance or forming. It will all play out this year since we are in the 4th year of the accounting cycle. If we get a forming event this year, last year's event will be referred to permanently as a maintenance event. If we get a maintenance event this year, last year's event will be permanently referred to as a process flow. If we get neither, it will be permanently referred to as maintenance. It all boils down to the requirement that we have 4 maintenance events in the 10 year accounting cycle with no more than 4 years between any two.

Hope that helps.

Keith

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

From: Anne Savery [mailto:asavery@tulaliptribes-nsn.gov]
Sent: Wednesday, October 08, 2014 2:42 PM
To: Presler, Dawn
Cc: Binkley, Keith
Subject: RE: JHP (FERC No. 2157) - OCMP for your review by Oct 30

Dawn

Table 1 describes the 3/16/2014 as a CM - channel maintenance flow. It is my understanding that PUD wanted to label it as a CF - channel formation flow. Since PUD is doing the channel resurvey etc, I want to make sure this label is correct.

Please clarify and I'll work on my comments etc.

Thanks

Anne

From: Presler, Dawn [DJPresler@SNOPUD.com]
Sent: Tuesday, October 07, 2014 3:45 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us); Anne Savery; 'Maynard, Chris (ECY)' (cmay461@ecy.wa.gov);

'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'Leonetti, Frank' (frank.leonetti@snoco.org); Mick Matheson; 'Jim Miller' (JMiller@ci.everett.wa.us); Tom O'Keefe
Subject: JHP (FERC No. 2157) - OCMP for your review by Oct 30

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Thanks for your review.

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

Public Utility District No. 1 of Snohomish County PO Box 1107 Everett, WA 98206-1107

Presler, Dawn

From: Anne Savery <asavery@tulaliptribes-nsn.gov>
Sent: Wednesday, November 05, 2014 2:15 PM
To: Presler, Dawn
Cc: Binkley, Keith
Subject: RE: Jackson Hydroproject-- Comments for Operation Compliance Monitoring Report for your review by Oct 30

Dawn
Ok great, thanks for the response.
Anne

From: Presler, Dawn [DJPresler@SNOPUD.com]
Sent: Tuesday, November 04, 2014 2:15 PM
To: Anne Savery
Cc: Binkley, Keith
Subject: RE: Jackson Hydroproject-- Comments for Operation Compliance Monitoring Report for your review by Oct 30

Hi Anne,
That's my bad. I skimmed your comment and thought it was the same one that you previously sent to Keith which did get included in the consultation document. I will refile with the 10/29 comment and our response (hopefully by Friday depending on Keith's field schedule). Commenting in the Word document is fine.

Dawn

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

From: Anne Savery [mailto:asavery@tulaliptribes-nsn.gov]
Sent: Tuesday, November 04, 2014 1:25 PM
To: Presler, Dawn
Subject: FW: Jackson Hydroproject-- Comments for Operation Compliance Monitoring Report for your review by Oct 30

Hi Dawn

I reviewed the final OCMP and found that my comment on Page 2 of the attached document was not included in the consultation documents. I'm going to survive its exclusion, however I'd like to know how best to submit comments in the future. Is it acceptable to add comments in the Word document? Or do you need them in a separate email or Word document with references to the page number?

Thanks
Anne

From: Anne Savery
Sent: Wednesday, October 29, 2014 1:47 PM
To: Applegate, Brock A (DFW); Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us); Maynard, Chris (ECY); 'Leonetti, Frank' (frank.leonetti@snoco.org); Mick Matheson; 'Jim Miller' (JMiller@ci.everett.wa.us); Tom O'Keefe
Subject: RE: Jackson Hydroproject-- Comments for Operation Compliance Monitoring Report for your review by Oct 30

Here are the Tribe's comments on the OCMP.
Thanks
Anne

From: Applegate, Brock A (DFW) [Brock.Applegate@dfw.wa.gov]
Sent: Monday, October 27, 2014 3:42 PM
To: Presler, Dawn; 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us); Anne Savery; Maynard, Chris (ECY); 'Leonetti, Frank' (frank.leonetti@snoco.org); Mick Matheson; 'Jim Miller' (JMiller@ci.everett.wa.us); Tom O'Keefe
Cc: Whitney, Jennifer L (DFW); Bails, Jamie L (DFW); Allegro, Justin K (DFW); Beecher, Hal (DFW)
Subject: Jackson Hydroproject-- Comments for Operation Compliance Monitoring Report for your review by Oct 30

Hi Dawn, WDFW have reviewed the Annual Report and we have no comments.

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: Tuesday, October 07, 2014 3:45 PM
To: 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us); Anne Savery; Maynard, Chris (ECY); Applegate, Brock A (DFW); 'Leonetti, Frank' (frank.leonetti@snoco.org); Mick Matheson; 'Jim Miller' (JMiller@ci.everett.wa.us); Tom O'Keefe
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Thanks for your review.

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

Public Utility District No. 1 of Snohomish County PO Box 1107 Everett, WA 98206-1107

Table 1. Process Flow Log, July 2013 - June 2014.

Date ¹	Time ²	Magnitude ³ (cfs)	Duration ⁴ (hours)	Accretion ⁵ (cfs)	Notes ⁶	Counts as PF Type ⁷
9/16/2013	1215 to 0230 (9/17)	R1 – 1,350 (average)	14.5			F, U
9/24/2013	2245 to 1000 (9/25)	R2 – 543 (average)	11.25			F, U
9/24/2013	2100 to 1030 (9/25)	R3 – 514 (average)	13.75			F
3/16/2014	1215 to 1500 (3/17)	R1 – 4,508 (average)	26.75	R1- cumulative accretion (including spill), measured at Powerhouse: 1,100 to 2,000 cfs	Full operational release sequenced with reservoir spill, 5.7" of rainfall in 24 hour period between 3/15/14 (2200 HR) and 3/16/14 (2100 HR)	CM
4/1/2014	0000 to 2245 (4/4)	R1 – 1,722 (average)	94.75			FL, O
4/17/2014	0400 to 0630 (4/18)	R3 & R2 – 486 (average)	26.5			FL, O
4/17/2014	0615 to 1500	R1 – 1,649	8.75			O
5/21/2014	0615 to 1300	R2- 690	6.75			O
5/21/2014	0630 to 1315	R1 – 2,000	6.75			O

Commented [O1]: The Tulalip Tribes agree this should be considered a CM flow, rather than CF. We appreciate that PUD is preserving the option to get a CF flow in this 10 year period. If not, we'll need to look at the reservoir rule curves to manage the system toward spill.

¹ Start Date of Event (MM/DD/YYYY)

² Start Time to End Time

³ Magnitude of the Event for Each Compliance Location (R1-Reach 1, R2-Reach 2, R3-Reach 3)

⁴ Duration of Event

⁵ Portion of Event Attributed to Accretion Flows

⁶ Notes of Day's Event, Sequencing with Other Flow Events/Maintenance

⁷ Channel Forming (CF), Channel Maintenance (CM), Flushing (F), Outmigration (O), Upmigration (U) as defined in the PF Plan

ARC Comment	District Response
<p>Tulalip Tribes, email 10/09/2014 Table 1 describes the 3/16/2014 as a CM - channel maintenance flow. It is my understanding that PUD wanted to label it as a CF - channel formation flow. Since PUD is doing the channel resurvey etc, I want to make sure this label is correct.</p>	<p>The District is preserving its options as to how to label that event. By doing the resurvey etc., it gives us the option to call it either maintenance or forming. It will all play out this year since we are in the 4th year of the accounting cycle. If we get a forming event this year, last year's event will be referred to permanently as a maintenance event. If we get a maintenance event this year, last year's event will be permanently referred to as a process flow. If we get neither, it will be permanently referred to as maintenance. It all boils down to the requirement that we have 4 maintenance events in the 10 year accounting cycle with no more than 4 years between any two.</p>
<p>Tulalip Tribes, emailed MSWord comments 10/29/2014 Table 1 for 3/16/2014: The Tulalip Tribes agree this should be considered a CM flow, rather than CF. We appreciate that PUD is preserving the option to get a CF flow in this 10 year period. If not, we'll need to look at the reservoir rule curves to manage the system toward spill.</p>	<p>On 11/4/2014, the District successfully conducted a Channel Maintenance Flow. This is the first of four Channel Maintenance events that will be conducted within the current 10 year accounting cycle. With this event, we are compliant with the license requirement that these events occur not less than every four years within the accounting cycle. As such, and as previously discussed with the ARC, the 3/16/2014 event, will now officially be considered as a Channel Forming Event. The District is compliant with all License requirements articulated under the Process Flow Plan. The District will continue to operate the reservoir responsibly as identified in the reservoir rule curves required by License Article 406 and Aquatic License Article 14.</p>