



Your Community Energy Partner

May 9, 2019

VIA ELECTRONIC FILING

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

**Re: Jackson Hydro Project, FERC No. 2157
Instream Flow Schedule for Reach 3 of the Sultan River - Water Year 2019-2020**

Dear Secretary Bose:

With this letter, Public Utility District No. 1 of Snohomish County (the District) is transmitting the instream flow schedule for the Jackson Hydroelectric Project (Project) within Reach 3 (River Mile [RM] 9.7 to 16.1) of the Sultan River for the 2019-2020 Water Year, see Attachment 1. This instream flow schedule is consistent with the requirements identified under "A-LA 9: Minimum Flows" in Appendix G of the Project's License. This flow schedule reshapes the default flow schedule identified in A-LA 9 based on consultation with the Aquatic Resource Committee, see Attachment 2; no requests for modification were received.

The shaping of the annual 20,362 acre-foot water budget is largely for the benefit of anadromous species using Reach 3 of the Sultan River since completion of volitional fish passage at the City of Everett's Diversion Dam at RM 9.7. Specifically, the post-passage emphasis of flow management and budgeting focuses on meeting the physical habitat and water quality needs of fall (Chinook and coho salmon) and spring (steelhead trout) spawning populations. The instream flow schedule for Water Year 2019-2020 continues to balance the physical habitat and temperature requirements of the evolving fish community. This is the same shape of the flow schedule implemented in Water Year 2018-2019.

Please contact Keith Binkley, Natural Resources Manager at (425) 783-1769, if you should have any questions regarding this filing.

Sincerely,

/s/ Tom DeBoer

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

cc: Aquatic Resource Committee

**ATTACHMENT 1:
Water Year 2019-2020
Instream Flow Schedule for Reach 3**

Timeframe	Release Flow (cfs)
July 1*-15	25
July 16-31	25
August 1-15	25
August 16-31	25
September 1-14	40
September 15-21	64
September 22-30	63
October 1-15	59
October 16-31	50
November 1-15	28
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	15
March 1-15	15
March 16-31	35
April 1-15	36
April 16-30	28
May 1-15	34
May 16-31	30
June 1-15	24
June 16-30	25

* July 1 begins the water year.

ATTACHMENT 2:
Consultation Documentation

Presler, Dawn

From: Pacheco, James (ECY) <JPAC461@ECY.WA.GOV>
Sent: Monday, March 25, 2019 1:51 PM
To: Presler, Dawn; Binkley, Keith
Subject: RE: JHP (FERC No. 2157) - A-LA 9 Reach 3 instream flow for Water Year 2019-2020

CAUTION: THIS EMAIL IS FROM AN EXTERNAL SENDER.
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Hi Keith and Dawn.

You've been sending me reminder emails, and I mean to follow up, but streamflow restoration stuff gets in the way. Sorry for dropping the ball. I talked with Anne (she helped develop the flow regime) and its okay to continue this flow regime for 2019-2020, but we do want to ARC to investigate if these two years of altered flows have any discernable effects. This will be valuable to know when the flow budget increases.

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

This communication is a public record and may be subject to disclosure as per the Washington State Public Records Act, RCW 42.56.

From: Presler, Dawn [mailto:DJPresler@SNOPUD.com]
Sent: Monday, March 25, 2019 1:26 PM
To: 'Vacirca, Richard -FS' <rvacirca@fs.fed.us>; 'Anne Savery' <asavery@tulaliptribes-nsn.gov>; 'Janet Curran - NOAA Federal' <janet.curran@noaa.gov>; 'Asman, Lindsay' <lindsay_asman@fws.gov>; 'Rustay, Michael' <mike.rustay@co.snohomish.wa.us>; 'Jim Miller (JMiller@everettwa.gov)' <JMiller@everettwa.gov>; 'nate.morgan@ci.sultan.wa.us' <nate.morgan@ci.sultan.wa.us>; 'okeefe@americanwhitewater.org' <okeefe@americanwhitewater.org>; 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) - A-LA 9 Reach 3 instream flow for Water Year 2019-2020

Dear Jackson ARC Members:

Below is the draft Reach 3 flow schedule for the next water year (July 2019-June 2020); it is different than the default schedule in A-LA9 but the same schedule for the current water year as Jim and Keith developed the previous year. Please take the next 30 days to review and provide comments, if any, **by Wednesday April 24**. Sending me a concurrence email as well would be fantastic! Thanks.

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July 1*-15	25
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* July 1 begins the water year.

As a reminder, A-LA 9 states “Starting with the 2020 water budget (July 2020 – June 2021) and for the remaining term of the License, the Licensee shall provide an additional 3,469 acre-feet to the water budget for a total annual water budget of 23,831 acre-feet, unless the ARC decides to delay or postpone this increase to the water budget” so there will be a new analysis early next year to determine that shaping.

Dawn Presler

Sr. Environmental Coordinator
 Generation – Natural Resources
 (425) 783-1709

PUD No. 1 of Snohomish County

Presler, Dawn

From: Binkley, Keith
Sent: Tuesday, March 26, 2019 9:25 AM
To: 'Anne Savery'; Presler, Dawn; 'Vacirca, Richard -FS'; 'Janet Curran - NOAA Federal'; 'Asman, Lindsay'; 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'nate.morgan@ci.sultan.wa.us'; 'okeefe@americanwhitewater.org'; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'jford@fs.fed.us'
Cc: McDonnell, Andrew; Lowe, Larry
Subject: RE: JHP (FERC No. 2157) - A-LA 9 Reach 3 instream flow for Water Year 2019-2020
Attachments: Copy of Variable Instream Flow Release Schedule for Reach 3 - 2017-2018-JP.xlsx

Sorry - forgot the attachment

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

From: Binkley, Keith
Sent: Monday, March 25, 2019 3:53 PM
To: 'Anne Savery' <asavery@tulaliptribes-nsn.gov>; Presler, Dawn <DJPresler@SNOPUD.com>; 'Vacirca, Richard -FS' <rvacirca@fs.fed.us>; 'Janet Curran - NOAA Federal' <janet.curran@noaa.gov>; 'Asman, Lindsay' <lindsay_asman@fws.gov>; 'Rustay, Michael' <mike.rustay@co.snohomish.wa.us>; 'Jim Miller (JMiller@everettwa.gov)' <JMiller@everettwa.gov>; 'nate.morgan@ci.sultan.wa.us' <nate.morgan@ci.sultan.wa.us>; 'okeefe@americanwhitewater.org' <okeefe@americanwhitewater.org>; '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>; 'jford@fs.fed.us' <jford@fs.fed.us>
Cc: McDonnell, Andrew <AWMcDonnell@SNOPUD.com>; Lowe, Larry <LGLowe@SNOPUD.com>
Subject: RE: JHP (FERC No. 2157) - A-LA 9 Reach 3 instream flow for Water Year 2019-2020

Hi Anne - glad that you and Jim had a chance to chat about this. I am attached an Excel file that Jim prepared during our in-depth analysis. As you will see, will allocated a significant chunk of the budget to both the spring and fall spawners. I will get with my staff and start gathering information for a flow budget shaping discussion prior to the July 2020 increase.

Keith

Jennifer - welcome! For your benefit, we are discussing Aquatic License Article 9 (Minimum Flows) and specifically, the shaping of the minimum flow releases for Reach 3 of the river, this is the section between Culmback Dam and the Diversion Dam, 6.4 miles downstream. The annual water budget for releases to this reach is 20,362 acre feet currently and increases to 23,831 acre feet next July. For reference, the average annual inflow to Spada Reservoir is 526,338 acre feet.

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

From: Anne Savery [mailto:asavery@tulaliptribes-nsn.gov]
Sent: Monday, March 25, 2019 1:50 PM
To: Presler, Dawn <DJPresler@SNOPUD.com>; 'Vacirca, Richard -FS' <rvacirca@fs.fed.us>; 'Janet Curran - NOAA Federal' <janet.curran@noaa.gov>; 'Asman, Lindsay' <lindsay_asman@fws.gov>; 'Rustay, Michael' <mike.rustay@co.snohomish.wa.us>; 'Jim Miller (JMiller@everettwa.gov)' <JMiller@everettwa.gov>; 'nate.morgan@ci.sultan.wa.us' <nate.morgan@ci.sultan.wa.us>; 'okeefe@americanwhitewater.org'

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Keith

Jim and I talked briefly about the flow schedule. Last year, we reshaped the flow schedule to support spring spawners. Can you remind us if we focused on juveniles as well?

In order to assess the influence of the changes could you provide the following:

What was the delta of the flow schedule between the past two years?

The number of spring spawners found in Reach 3 (or that went above the diversion dam) this year and last year - were we successful in attracting fish to Reach 3? What data gaps do we have there?

Temperature regime this year and last year - any shift in temperature noticed? Can it be attributed to change in flow regime?

Additionally, I note that there will be an additional 3,469 acre feet per year available beginning in July 2020. I suggest we place reshaping flows and addressing temperatures in Reach 3 on the ARC agenda (could be habitat committee) and perhaps invite other experts to participate in discussing how we shape flows and temperatures in the future. We talk about smolt trapping and the condition of juveniles that are captured coming out of reach 3. It would be beneficial to get a presentation on fish growth rates and how our decisions will influence the rearing/spawning in reach 3. I know Mike Crewson is very interested in the topic. This could be a longer term discussion so that we are prepared for 2020.

Thanks

Anne

Anne Savery
Hydrologist
503-984-0667

From: Presler, Dawn <DJPresler@SNOPUD.com>
Sent: Monday, March 25, 2019 1:26:14 PM

To: 'Vacirca, Richard -FS'; Anne Savery; 'Janet Curran - NOAA Federal'; 'Asman, Lindsay'; 'Rustay, Michael'; 'Jim Miller (JMiller@everettwa.gov)'; 'nate.morgan@ci.sultan.wa.us'; 'okeefe@americanwhitewater.org'; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV)
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[cid:image001.png@01D4E30E.523CA360]

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Everett, WA 98206-1107