



February 2, 1990

PUD-18890

CERTIFIED

Ms. Lois D. Cashell, Secretary  
Federal Energy Regulatory Commission  
825 North Capitol Street NE  
Washington, D.C. 20426

Dear Ms. Cashell:

RE: Henry M. Jackson Project - FERC No. 2157  
Wildlife Habitat Management Program  
Annual Report

The 1989 Annual Report for the Jackson Project Wildlife Habitat Management Program is enclosed. This report fulfills the requirement of the "Order Approving with Modification Revised Wildlife Habitat Management Plan" (issued May 19, 1989), which stated that "The Licensees shall file with the Commission their annual reports on Phase I. . . ."

This first annual report describes activities conducted during 1988 and 1989 and summarizes activities anticipated for 1990. The activities, procedures and schedules described in this report are based on the Wildlife Habitat Management Plan submitted to FERC on May 25, 1988.

The draft annual report was submitted to the U.S. Forest Service (USFS), U.S. Fish and Wildlife Service (USFWS), the Washington Department of Wildlife (WDW) and the Tulalip Tribes for comment on November 22, 1989. Comments were requested no later than December 26, 1989. Comments were received from USFWS on January 16, 1990 and from USFS on January 22, 1990. Comments have not been received from WDW or the Tulalip Tribes. Numerous attempts were made to contact the appropriate individuals to find out when comments might be forthcoming. Representatives from WDW and the Tulalip Tribes informed the District just prior to finalizing this letter that they would not be submitting comments.

The co-licensees request that the file date for future annual reports be changed from December 31 of a given year to March 31 of the following year for two specific reasons. First, in order to report on a year's activities from January through December, time is needed following December 31 to prepare the report, obtain agency comments, and modify the report accordingly, prior to submitting it to FERC. We estimate a three month time period for this process. Second, the month of December proved to be a particularly bad month for obtaining agency comments because of the holidays and end-of-the-year activities.

1948

1. The first part of the report deals with the general situation of the country and the progress of the work during the year.

2. The second part deals with the work of the various departments and the results achieved.

3. The third part deals with the financial position of the organization and the budget for the next year.

4. The fourth part deals with the personnel and the training of staff.

5. The fifth part deals with the general conclusions and recommendations.

The first part of the report deals with the general situation of the country and the progress of the work during the year. It is a general overview of the work done and the results achieved. It is a summary of the work done and the results achieved.

The second part deals with the work of the various departments and the results achieved. It is a detailed account of the work done in each department and the results achieved. It is a detailed account of the work done in each department and the results achieved.

The third part deals with the financial position of the organization and the budget for the next year. It is a detailed account of the financial position of the organization and the budget for the next year. It is a detailed account of the financial position of the organization and the budget for the next year.

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The fifth part deals with the general conclusions and recommendations. It is a detailed account of the general conclusions and recommendations. It is a detailed account of the general conclusions and recommendations.

Thank you for your consideration of a change in the file date for the annual report to March 31 of the following year. Please call Karen Bedrossian (206 347-4374) if you have questions.

Sincerely,

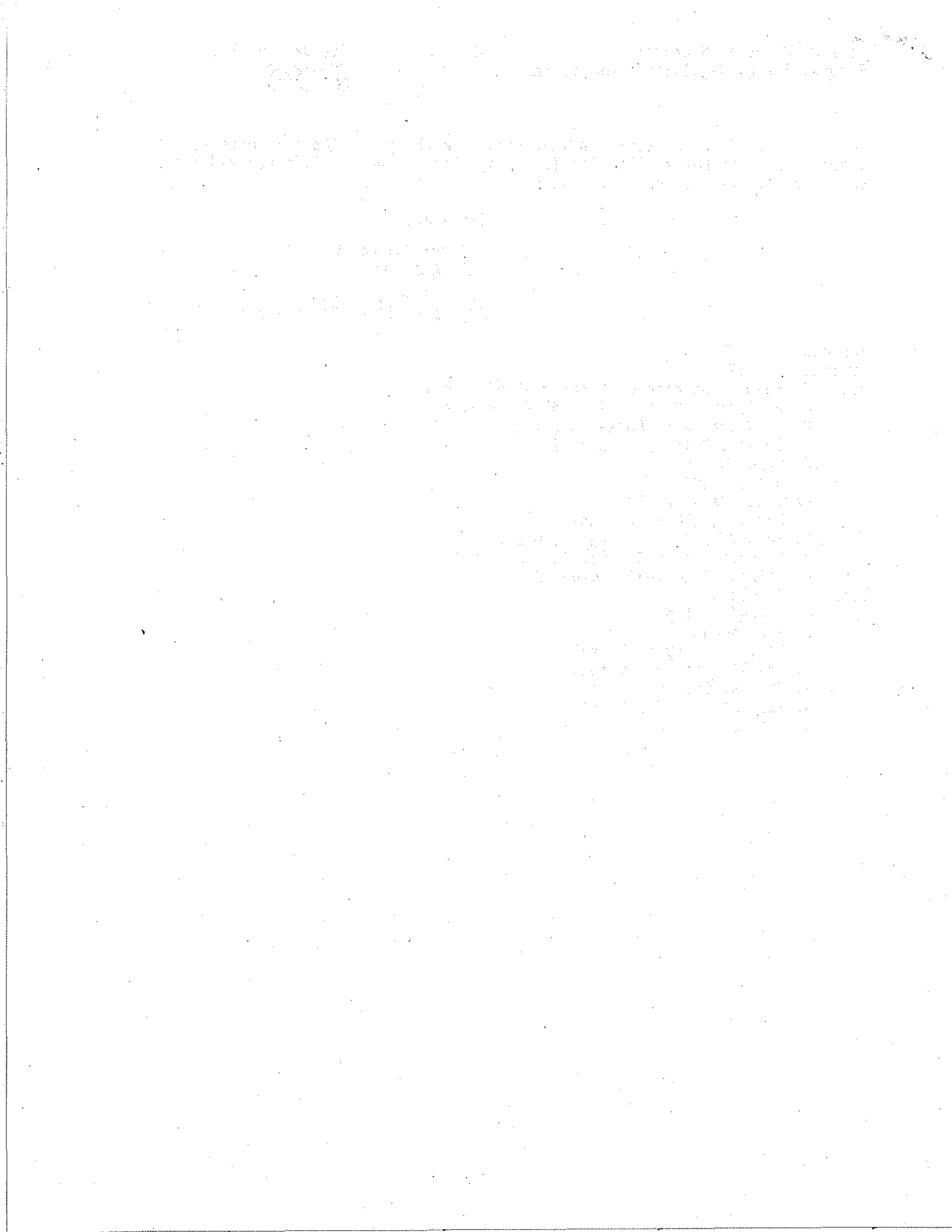
Original Signed By:  
J. D. Maner

J. D. Maner, Director  
Engineering and Power Supply

Enclosures

JDM:KLB:vr/2049U

cc: G. Engman, Washington Department of Wildlife  
C. A. Dunn, U.S. Fish & Wildlife Service  
P. A. Green, U.S. Forest Service  
D. Somers, Tulalip Tribes, Inc.  
G. Ging, USFWS  
J. Potter, DNR  
Regional Manager, DNR  
A. Martin, FERC (Portland)  
P. Murphy, FERC (Washington, D.C.)  
J. M. Robinson, FERC (Washington, D.C.)  
R. Saizan, FERC (Washington, D.C.)  
bcc: J. B. Olson  
K. L. Bedrossian  
B. Tannenbaum  
C. Olivers, City of Everett  
D. Lowell, City of Everett  
G. Graves, City of Everett  
D. Farwell, City of Everett  
R. Johnson



**1989 ANNUAL PROGRESS REPORT**  
**WILDLIFE HABITAT MANAGEMENT PROGRAM**  
for the  
**HENRY M. JACKSON HYDROELECTRIC PROJECT**  
**FEDERAL ENERGY REGULATORY COMMISSION**  
Project Number 2157

Submitted by  
**PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY**  
and  
**THE CITY OF EVERETT, WASHINGTON**

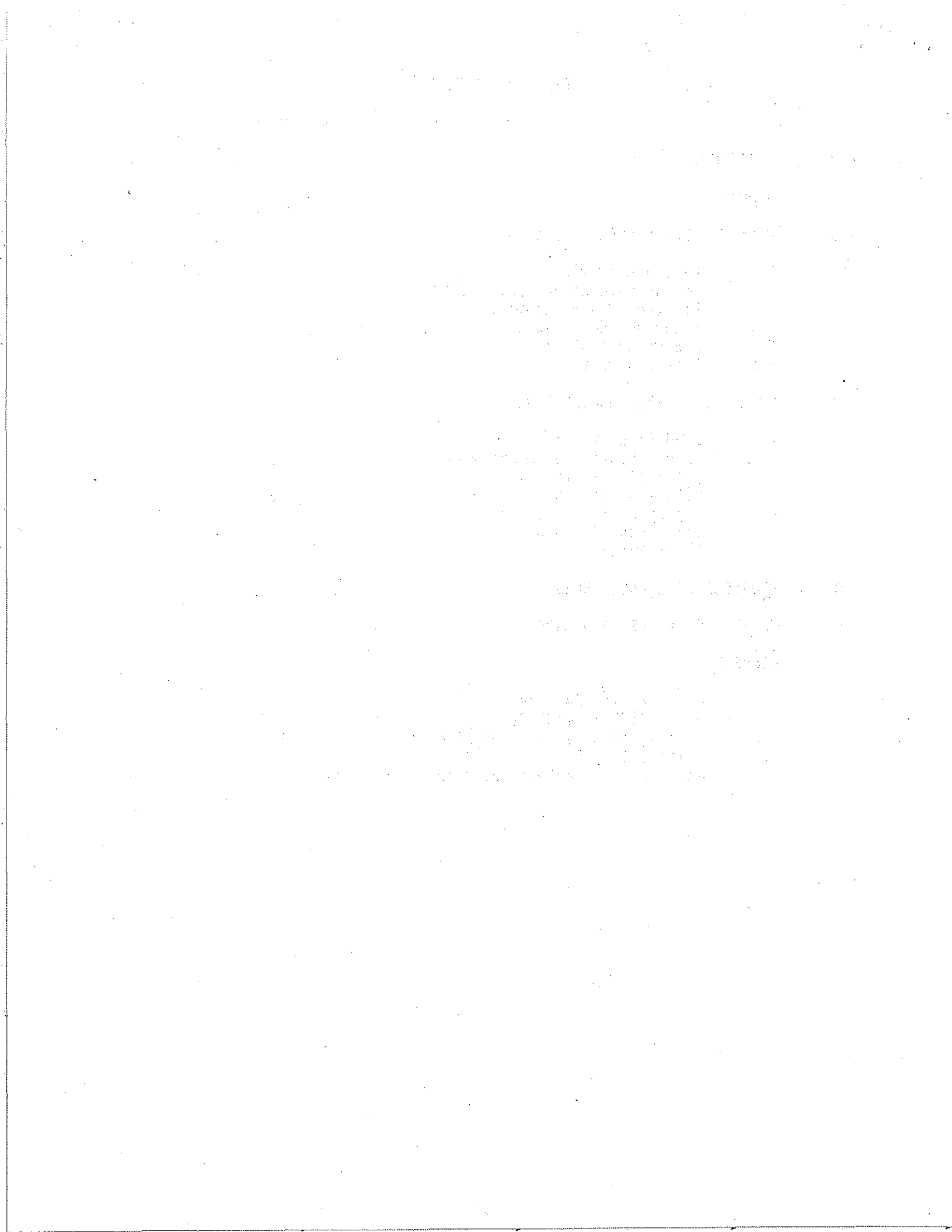
February 1990

THE UNIVERSITY OF CHICAGO  
DEPARTMENT OF CHEMISTRY  
5800 S. UNIVERSITY AVENUE  
CHICAGO, ILLINOIS 60637  
TEL: 773-936-3700

THE UNIVERSITY OF CHICAGO  
DEPARTMENT OF CHEMISTRY  
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## 1.0 INTRODUCTION

The 1989 Annual Progress Report on the Wildlife Habitat Management Program for the Henry M. Jackson Hydroelectric Project is submitted in response to the Federal Energy Regulatory Commission (FERC) Order Approving With Modification Revised Wildlife Habitat Management Plan (Issued May 19, 1989). This first annual report describes activities conducted during 1988 and 1989 and summarizes activities anticipated for 1990. Activities, procedures and schedules described in this report are based on the Wildlife Habitat Management Plan (WHMP) submitted to FERC on May 25, 1988. Problems or changes needed during the course of the WHMP implementation are discussed and updated schedules are presented. The draft report was submitted to the U. S. Forest Service (USFS), U. S. Fish and Wildlife Service (USFWS), the Washington Department of Wildlife (WDW) and the Tulalip Tribes for comment.

## 2.0 SUMMARY

The FERC "Order Approving With Modification Revised Wildlife Habitat Management Plan" was issued May 19, 1989. The Implementation Phase of the WHMP, which was originally scheduled for 1988 through 1995, will be consolidated to 1990 through 1995 with the exception of those tasks already completed as described in Section 3.0 of this report.

The Public Utility District No. 1 of Snohomish County (District) has hired a Biologist who will be responsible for implementation of the WHMP. The District's Wildlife Biologist responsible for the preparation of the WHMP will

be assisting with WHMP implementation on a part-time basis. In addition, the City of Everett (City) has hired a Forester who will play a key role in implementation of the WHMP.

Tasks accomplished during 1988 and 1989 include: the purchase of 205 acres of lake, wetland and forest habitat; placement of stump piles on the power pipeline right-of-way to inhibit habitat destruction by recreational vehicles and increase habitat diversity; and construction of waterfowl nest boxes and osprey nest structures.

Tasks scheduled for 1990 include: creating four forest openings on approximately 91 acres of land; initiating snag creation; placing waterfowl nest boxes and one osprey nesting platform; building and placing nesting islands; planting/seeding trees, shrubs and grass; and fertilizing 65 acres.

### 3.0 WORK COMPLETED DURING 1988 AND 1989

#### 3.1 LAND ACQUISITION

In January 1988 the District purchased 205 acres referred to in the WHMP as the Lost Lake Tract. The Tract consists of 29 acres of lake and wetland and 176 acres of second growth forest. The previous owner was planning to subdivide the Tract into 20-acre suburban residential lots. As part of the WHMP the Lost Lake Tract will be protected from residential development. The lake and wetland habitat will be enhanced by a forested buffer zone, snags, nesting islands, waterfowl nest boxes, and an osprey

nesting structure. Forested lands outside the buffer zone will be managed to optimize habitat for black-tailed deer, ruffed grouse and black-capped chickadee. Refer to the WHMP for additional details.

The District and City are continuing to pursue land exchanges with the USFS and Washington Department of Natural Resources (DNR). Timber cruises have been conducted and appraisals are being prepared. Finalization of the exchanges is anticipated in late 1990 and will result in the District and City's acquisition of the Williamson Creek Tract (Section 3.5 of the WHMP) from DNR and approximately 3,500 acres of land under and adjacent to Spada Lake currently managed by the USFS.

### 3.2 FOREST VEGETATION MANAGEMENT

The City has hired a forester to assist with the implementation of forest vegetation management activities described in the WHMP (Section 2.1-2.4) and scheduled to begin in 1990 (Table 5.1 of the WHMP). Snag creation, which was scheduled to begin in 1989, has been delayed until 1990 because of the delay in FERC approval of the Plan and the merits of having both the new forester and the new wildlife biologist (see summary of this report, Section 2.0) on board prior to initiation of major implementation activities.

### 3.3 RIGHT-OF-WAY MANAGEMENT

In August 1988, 46 piles of stumps were placed on the power pipeline right-of-way. The stump piles were placed to reduce off-road vehicle traffic, provide habitat diversity and provide future nesting and foraging areas for

various mammals, birds and herptiles. Brush piles were originally proposed in the Plan, but were not allowed by the DNR because of potential fire hazard. Placement was not scheduled in the WHMP. The District acted upon an opportunity for habitat improvement in addition to that specified in the WHMP. The areas around the stump piles will be seeded/planted as recommended by a horticulturist following the guidelines set forth in the WHMP (Section 2.5).

#### 3.4 WATERFOWL NEST BOXES

Two waterfowl nest boxes were constructed and are ready for placement at Lost Lake.

#### 3.5 OSPREY NEST STRUCTURES

Three osprey nest structures have been constructed and are ready for placement at Spada Lake and Lost Lake. Potential placement sites have been selected. The USFS rescinded their authorization to implement the WHMP on National Forest lands in October 1988. Until this matter can be rectified with USFS, placement of the two osprey nest structures on the Spada Lake Tract will be delayed.

#### 3.6 DEBRIS REMOVAL

The shoreline of Spada Lake was assessed for debris removal in August 1988. Sites were selected for providing big game trails in areas with debris too dense to allow movement by deer. Fire hazard became a problem and the

trails were not cleared in 1988. The USFS rescinded their authorization to implement the WHMP on National Forest lands in October 1988. Until this matter can be rectified with USFS, implementation of the WHMP will be delayed on the Spada Lake Tract. The shoreline was reassessed in September 1989. Debris had been washed away and it did not appear that clearing was needed.

#### 4.0 WORK ANTICIPATED DURING 1990

##### 4.1 LAND ACQUISITION

In 1990 the District and City expect to acquire the Williamson Creek Tract (Section 3.5 in the WHMP) and over 3,500 acres (including approximately 1,900 acres described in detail in the WHMP, Section 3.4) from the USFS. The Williamson Creek Tract will be managed as described in the WHMP. Acres acquired from the USFS will be managed according to the WHMP for the Spada Lake Tract. Detailed plans will be prepared for the land added to the Spada Lake Tract as described in Section 3.4.5.5 of the WHMP.

##### 4.2 FOREST VEGETATION MANAGEMENT

Harvest as described in the WHMP is scheduled to occur on four stands in the Lake Chaplain Tract (Table 6.1 of this report). Precommercial thinning is scheduled for approximately 54 acres of closed canopy sapling/pole coniferous forest on the Lost Lake Tract to improve deer habitat.

The snag management program will be initiated in areas scheduled for harvest and in stands not scheduled for harvest during the life of the WHMP (through 2060). Monitoring will be initiated as described in Sections 4.1, 4.2, 4.6 and 4.7 of the WHMP.

#### 4.3 ARTIFICIAL NESTING ISLANDS

Three artificial nesting islands will be constructed and placed at Lost Lake following the guidelines described in Section 2.6 of the WHMP. Monitoring will be initiated as described in Section 4.8 of the WHMP.

#### 4.4 WATERFOWL NEST BOXES

Two waterfowl nest boxes will be placed adjacent to Lost Lake following guidelines described in Section 2.7 of the WHMP. Maintenance and monitoring will be initiated and continue through 2060 as described in Section 4.9 of the WHMP.

#### 4.5 OSPREY NEST STRUCTURES

One osprey nest structure will be placed adjacent to Lost Lake as set forth in the guidelines in Section 2.8 of the WHMP. Monitoring and maintenance will be initiated as described in Section 4.10 of the WHMP.

#### 4.6 TREE/SHRUB PLANTINGS

Trees and shrubs will be planted and fertilized as advised by a horticulturist on approximately 73 acres (Table 6.1 of this report) north of Lake Chaplain, west of the marsh below Lake Chaplain, on the pipeline right-of-way and at the powerhouse site as described in Section 2.5, 3.1.6 and 3.3 of the WHMP. Monitoring will be initiated as described in Sections 4.3 and 4.4 of the WHMP.

#### 4.7 GRASS SEEDING

Grass will be seeded and fertilized on the pipeline right-of-way as described in Section 2.5 and 3.3 of the WHMP. Monitoring will be initiated as described in Section 4.4 of the WHMP.

### 5.0 PROBLEMS OR CHANGES NEEDED

The schedule for implementation has been changed/consolidated (See Table 6.1 of this report) because of the unexpected delay in FERC approval of the WHMP. The Implementation Phase is still scheduled to be completed in 1995.

In August 1988 the USFS authorized implementation activities which are to be conducted on the Spada Lake Tract. In October 1988 USFS retracted approval of these activities. Retraction of the approval is related to the pending land exchange involving the Spada Lake Tract (See Section 7.1 of this

report). Completion of the land exchange should eliminate this problem. If the exchange is completed in 1990 as anticipated, implementation of the osprey nest structures, test plantings, and debris removal portions of the WHMP on the Spada Lake Tract will occur in 1991 (Table 6.1).

The District's Corporation Counsel is confident that the District has the right to implement the WHMP on the permanent pipeline right-of-way. The DNR has taken issue with this opinion and has advised the District against implementing the WHMP on lands within the DNR easements (See Section 7.5 of this report). DNR has suggested that the District obtain a lease or easement supplement for wildlife habitat management on the pipeline easement. It is anticipated that this issue can be resolved in 1990 so that activities scheduled for the pipeline right-of-way can be conducted.

## 6.0 UPDATED SCHEDULES AND MAPS

The updated schedule is presented on the following page. Updated maps were not needed for this report, but will be included in future reports as warranted.



Table 6.1 - Activity schedule for all management tracts for 1990 through 1995, summarized yearly.

Activity	YEARS											
	1990		1991		1992		1993		1994		1995	
	Stands	Acres	Stands	Acres	Stands	Acres	Stands	Acres	Stands	Acres	Stands	Acres
Final Harvest	1-3,1-9(1) 1-15,3-1 4-5	91			4-3,4-4 5-8	47	2-9,2-11 4-2	49			5-4,5-5	25
Commercial Thin			1-9,1-15 2-13,3-1 4-5	95			2-9	11				
Precommercial Thin	7-4	54										
Snag Creation(2)	553 SNAGS		553 SNAGS		553 SNAGS		553 SNAGS		553 SNAGS		552 SNAGS	
Nesting Islands	7-5	N/A	Maintenance will occur annually through 2060									
Nest Boxes	7-5	N/A	Maintenance will occur annually through 2060									
Osprey Platforms	7-5	N/A	9-11	N/A	Maintenance will occur as needed							
Test Plantings			9-10	N/A								
Tree/Shrub Plantings	1-17,4-8 8-3,8-4	73										
Grass Seeding	8-3	40										
Fertilization	8-3,8-4	65										
Debris Removal			9-1 THRU 9-10	N/A								

(1) Preharvest activities may delay harvest until 1991. This is currently being assessed by the City's Forester. NOTE: harvest in stands 1-9 and 1-15 constitutes one cutting unit.

(2) Number of snags is an estimate based on the assumption that two snags per acre will be created initially.

7.0 COMMENTS

7.1 U. S. FOREST SERVICE

PNP 16-3-7  
 PNP 16-3-4-3 (6/8/90)  
 PNP 16-8-1 (Land 1/27/91)  
 PUD-182604



United States  
 Department of  
 Agriculture

Forest  
 Service

Skykomish Ranger District  
 P.O. Box 305  
 Skykomish, Washington 98288

Caring for the Land and Serving People

Reply to: 2770/2630

Date: January 16, 1990

Karen Bedrossian  
 Environmental Coordinator/ (Wildlife Biologist)  
 Snohomish County PUD  
 PO Box 1107  
 Everett, WA 98206

Dear Karen,

The Forest Service will be directing their comments regarding the Wildlife Management Program Annual Report directly to FERC. The language you used in the report is appropriate. You asked me why the Forest Service did not allow implementation of the Wildlife Plan.

We review and approve many plans in a conceptual mode. For example, a ski area will prepare a master plan and environmental impact statement for the development of a ski area. We do not however, allow the area to implement the plan until it is under a special use permit and fee schedules for their use have been determined.

Currently, the Jackson Project does not have a special use permit. The wildlife plan is a good plan. I would question whether some of the actions are actual mitigation, if they are actions the the Forest Service would routinely do in the course of wildlife management. If they are proposed actions which the Forest Service would not do, and impact our flexibility to implement broader management strategies, then there needs to be additional compensation prior to implementation.

These complex issues may be rendered moot by the land exchange as proposed. However, prior to implementation we need to have the project under a special use permit or the exchange completed. Whether we need to address this at this point in the exchange evaluation, is something we can talk about in the upcoming weeks.

I hope this clarifies my position and please give me a call if you have any questions.

Sincerely,

*Phyllis A. Green*  
 Phyllis A. Green  
 District Ranger



RECEIVED		
JACKSON PROJECT		
JAN 28 1990		
	DATE	BY
J. Harker		
J. Olson		
R. Johnson		
R. Haggan		
G. Long		
D. Haggan		
K. Bedrossian		
R. Johnson		

FS-6700-1617-601



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
2625 Parkmont Lane SW, Bldg B
Olympia, Washington 98502
206/753-9440 FTS 434-9440

PJP 16-3-7
PUO-18849

January 12, 1990

Snohomish County Public Utilities District No. 1
P.O. Box 1107
Everett, Washington 98206

Re: Jackson Project - FERC No. 2157, Wildlife Habitat Management Program -
Annual Report

Dear Ms. Bedrossian:

The Service has reviewed the Annual Report (Report) for the Wildlife Habitat
Management Program (Program) and have the following comments to offer.

As noted in the Report, some changes in scheduling resulted in response to the
delay by the Federal Energy Regulatory Commission in approving the Program.
Additionally, some changes in scheduling and perhaps land base may result from
pending land transfers involving the Snohomish County Public Utilities District,
the Department of Natural Resources and the U.S. Forest Service. Since it is
difficult to predict what effects the resultant land transfers may have on the
implementation of the Program, it seems appropriate to meet jointly with the
District and other parties of the Program, when the land transfer issue is
resolved.

If you have any questions regarding the above comments, please call Mr. Gwill
Ging at (206) 753-9440.

Sincerely,

Lynn P. Childers

Lynn Childers
Acting Field Supervisor

GWG:fs

c: WDW, Engman, Mill Creek
Tulalip Tribes, Somers, Marysville
USFS, Green, Skykomish

RECEIVED
JACKSON PROJECT
JAN 19 1990
Table with columns for name, date, and other tracking information.

7.3 WASHINGTON DEPARTMENT OF WILDLIFE

No comments received

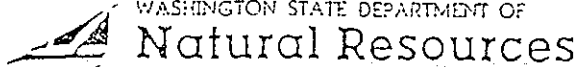
7.4 TULALIP TRIBES

No comments received

7.5

WASHINGTON DEPARTMENT OF NATURAL RESOURCES

PNP 16-3-1 (003)  
 PNP 16-3-7  
 PUD-16793



BRIAN BOYLE  
 Commissioner of Public Lands

December 8, 1989

Karen Bedrossian  
 Environmental Coordinator  
 Snohomish County PUD #1  
 P.O. Box 1107  
 Everett, Washington 99206

Northwest Region  
 919 N. Township St  
 Sedro Woolley, WA 98284

RE: Supplement No. 2 to Easement 50-044332

Dear Karen:..

With regard to your FERC 2157 Wildlife Habitat Management Program annual report dated November 22, 1989, please recall my letter to Roy Metzgar dated February 10, 1988. Again, I emphasize that the pipeline right-of-way document grants rights to PUD that are very limited and specific. It is not appropriate for PUD to claim credit for any Wildlife Habitat Management Program accomplishments on the right-of-way until PUD has acquired an easement supplement permitting such uses.

I allowed placement of the existing stump piles with the understanding that PUD would diligently pursue acquisition of the right to manipulate vegetation cover for wildlife on the right-of-way. Personnel changes at PUD may have interrupted that process, so I have drawn up a draft of the suggested supplement document (attached). After the draft has been returned to me with any additions or deletions and a map provided by PUD of where the permitted expansion will take place, a final supplement will be drawn up and sent to the PUD. Upon completion of signatures and payment of fees on the final supplement, Wildlife Habitat Management Program activities may proceed on the right-of-way.

Sincerely,  
  
 Joe Potter  
 Rivers District Manager

JP:jaf

Enclosure

cc: Bill Wallace Phyllis A. Green  
 Rick Cooper David Somers  
 Mike Naylor Don Farwell  
 Gary Engman Clair H. Olivers  
 Charles Dunn Region File No. 50-044332

RECEIVED		
JACKSON PROJECT		
DEC 11 1989		
	Office	Copy
J. Mener		
J. Olson		1
K. Johnson		
R. Morris		
C. Long		
D. Wiese		
K. Bedrossian		1
R. Johnson		
PLD		

STATE OF WASHINGTON  
DEPARTMENT OF NATURAL RESOURCES  
BRIAN J. BOYLE, Commissioner of Public Lands

EASEMENT 50-044332  
SUPPLEMENT NO.2

THIS SUPPLEMENTAL AGREEMENT, made and entered into this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, by and between the PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY, herein called the "Grantee," and the STATE OF WASHINGTON, acting by and through the DEPARTMENT OF NATURAL RESOURCES, herein called the "State," WITNESSETH:

Whereas, on the 13th day of November, 1981, the State granted easement No. 50-044332 referred to herein as the Original Easement, to the grantees. Said Original Easement is hereby supplemented as follows:

I

A. The Grantee and the State desire hereby to amend the Original Easement so as to expand the permitted use within the right of way as described in Exhibit A-1 of said original Easement.

NOW THEREFORE, the Grantee and the State mutually agree as follows:

1. The permitted use is supplemented to include the placing of stump piles and other vegetative matter in the right of way for the purpose of game habitat as required under FERC License Application No. 2157 Game Mitigation Plan. All placement of materials shall be approved by the State prior to placement.

2. Prior to approval of placement of materials, the Grantee shall pay the State \$ 250.00 per acre of right of way to be used for Game Mitigation, and supply the State with a map of the area to be encumbered.

Except as herein supplemented all of the terms, conditions and reservations of the Original Easement, as supplemented on the 29th day of March, 1983, shall remain in full force and effect.

IN WITNESS WHEREOF, the parties hereto have executed this instrument, in duplicate, to become effective as of the day and year first above written.

STATE OF WASHINGTON  
DEPARTMENT OF NATURAL RESOURCES

\_\_\_\_\_  
BRIAN J. BOYLE  
Commissioner of Public Lands

PUBLIC UTILITY DISTRICT NO. 1  
OF SNOHOMISH COUNTY

By: \_\_\_\_\_ Title

P.O.Box 1107  
Everett, Washington 98206



WASHINGTON STATE DEPARTMENT OF  
**Natural Resource**

Ph: (206) 856-0083

DNR  
Comments/  
WtMFP

16-3-4-3  
16-8-1  
17726

February 10, 1988

Mr. Martin Hatscher  
Acting Director, Power Management  
Snohomish County PUD  
P. O. Box 1107  
Everett, Washington 98201

FEB 10 1988	
A. Sch...	
C. ...	

Dear Mr. Hatscher:

Thank you for the opportunity to review the January, 1988 draft of the Jackson Project "Wildlife Habitat Management Plan". I would like to offer the following comments:

1. Section 3.3 indicates PUD's intent to manipulate surface vegetation types for wildlife habitat on the pipeline R/W. My interpretation of the wording in the easement granted by Department of Natural Resources to Snohomish County PUD is that the right to manipulate vegetation types was not conveyed to PUD except where such vegetation is incompatible with the pipeline. The right to manipulate wildlife habitat might be available under terms of a lease.
2. Appendix C, "Regulatory Requirements". Other statutes may be applicable under RCW 70.94, 76.04, 79.94, 78, 84, and 17; and WAC 332, 173, and 222, which relate to Forest Protection, Burning, Smoke Management, Forest Chemicals and Taxation.

Other statutes may apply if surface mining or oil and gas development is anticipated.

3. Appendix C, Table C-1 is misleading. The classes of forest practices and permit requirements are overly simplistic and do not reflect the statutory responses to environmentally sensitive situations. I suggest the table be eliminated from the text. Application requirements could be sorted out at an annual meeting at which DNR and PUD could present plans for management activities anticipated in the area.

Thank you again for the opportunity to comment.

Sincerely,

*Jos Potter BY RLC*  
Jos Potter  
Rivers District Manager

JP:ts

OLV:ts436,Ls#8

