



Your Northwest renewables utility

May 28, 2014

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) in Reach 3 of the Sultan River during the course of this water year (July 1, 2014 through June 30, 2015); see Attachment 1: Water Year 2014-2015 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, and continues the modified flow schedule for the current water year (through June 30, 2014) previously filed with the Commission on May 17, 2013.

The purpose of this change to the default schedule identified in A-LA 9 is to provide warmer water during key resident trout spawning and rearing periods in Reach 3 of the Sultan River (the reach between river miles 9.7 and 16.1), as compared to the default flow scheduled identified in A-LA 9. The change will involve re-shaping of the flow release schedule but result in no net change to the annual flow budget. This will balance physical habitat and temperature requirements (see Attachment 2: Reach 3 Flow and Temperature Data). By maximizing releases through the auxiliary line during the stratification period and carefully managing cool water releases, rainbow trout will benefit by:

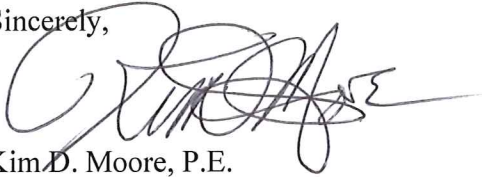
- Earlier initiation of spawning,
- Shorter incubation time,
- Exposure to longer and warmer growing conditions, and
- Being in a better position to overwinter.

The District consulted with the Aquatic Resources Committee (ARC) at the last Quarterly ARC Meeting in April 2014 regarding the benefits of the modified flow schedule – no members objected to the proposed instream flow schedule for Reach 3 (see Attachment 3: Consultation Documentation). Additionally, the District emailed the ARC with the proposed Reach 3 flow schedule on March 19, 2014, for a 30-day review and comment period. The information was reviewed at the ARC meeting on April 16. No comments recommending modifications to the

proposed schedule were received from ARC members. As such, the District will implement this modified flow schedule for Reach 3 effective for Water Year 2014-2015.

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,

A handwritten signature in black ink, appearing to read 'Kim D. Moore', with a long horizontal flourish extending to the right.

Kim D. Moore, P.E.
Assistant General Manager of Generation, Water, and Corporate Services
(425) 783-8606
KDMoore@snopud.com

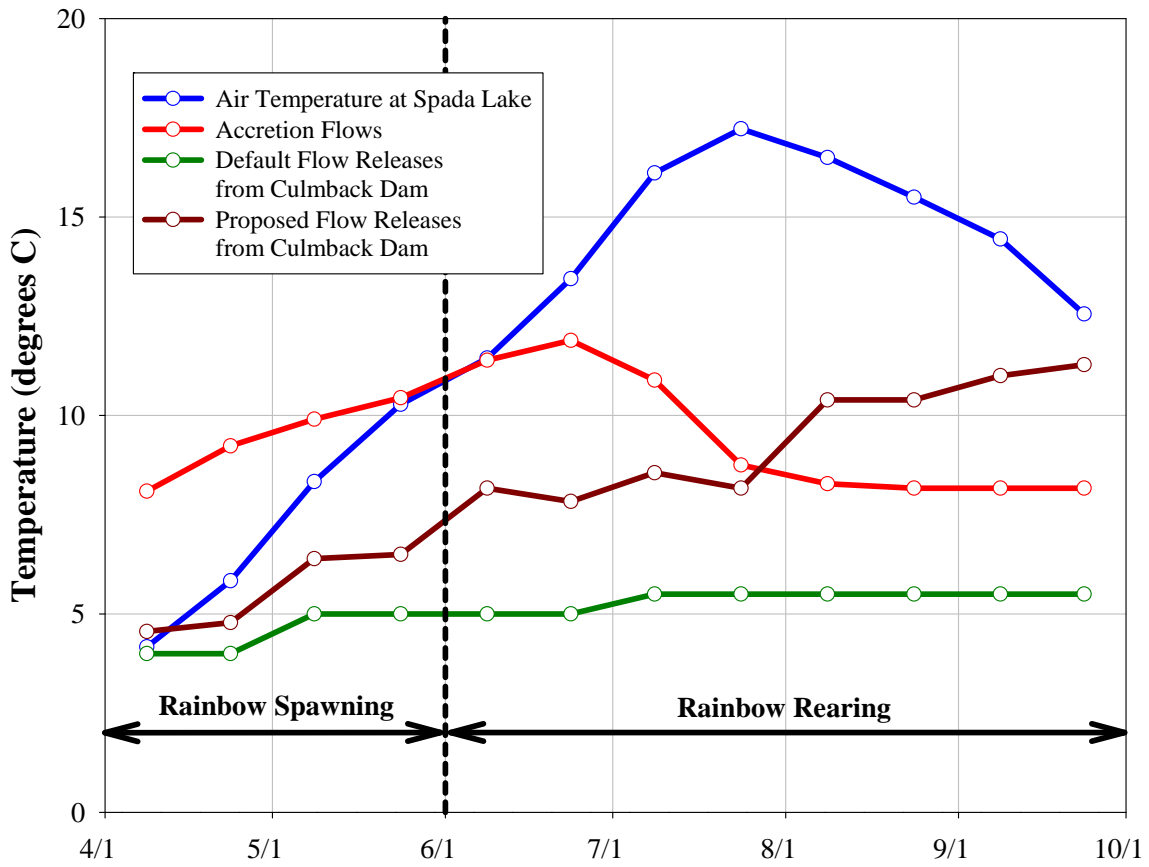
cc: Keith Binkley, District

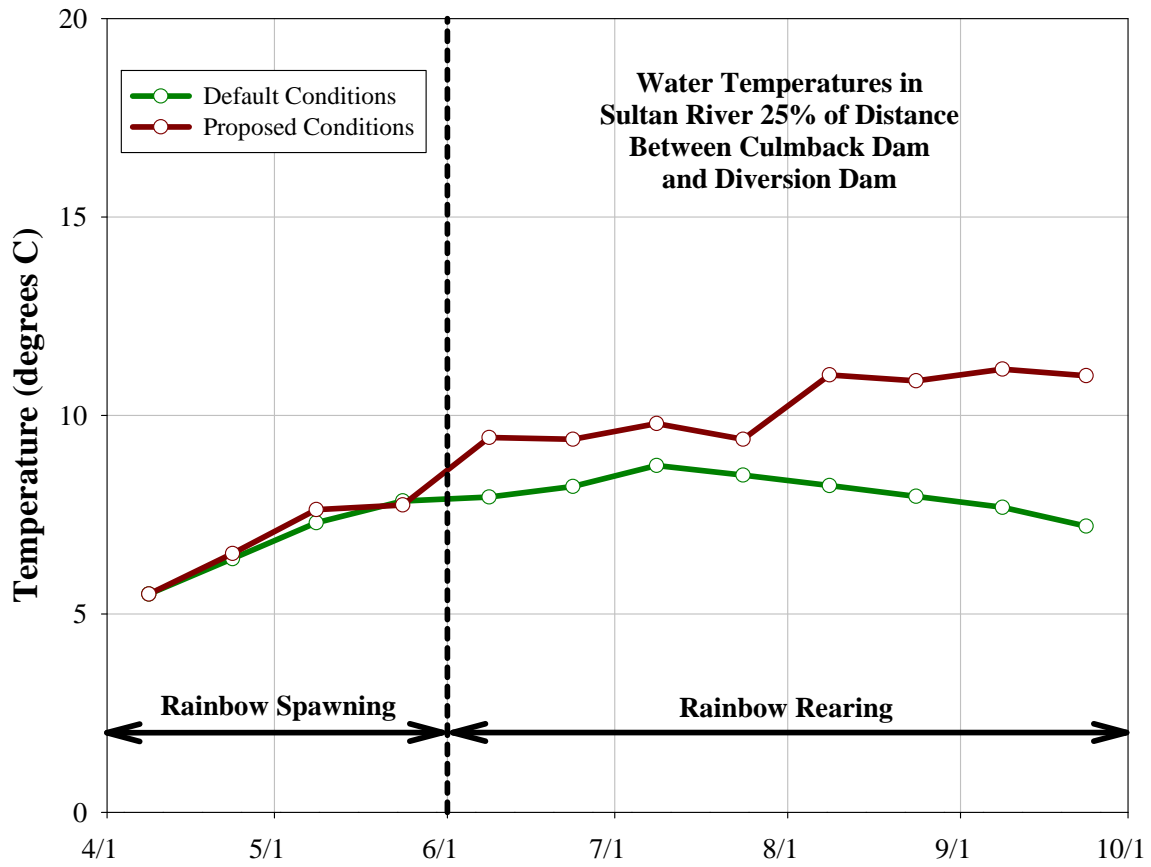
ATTACHMENT 1:
Water Year 2014-2015 Modified Instream Flow Schedule for Reach 3

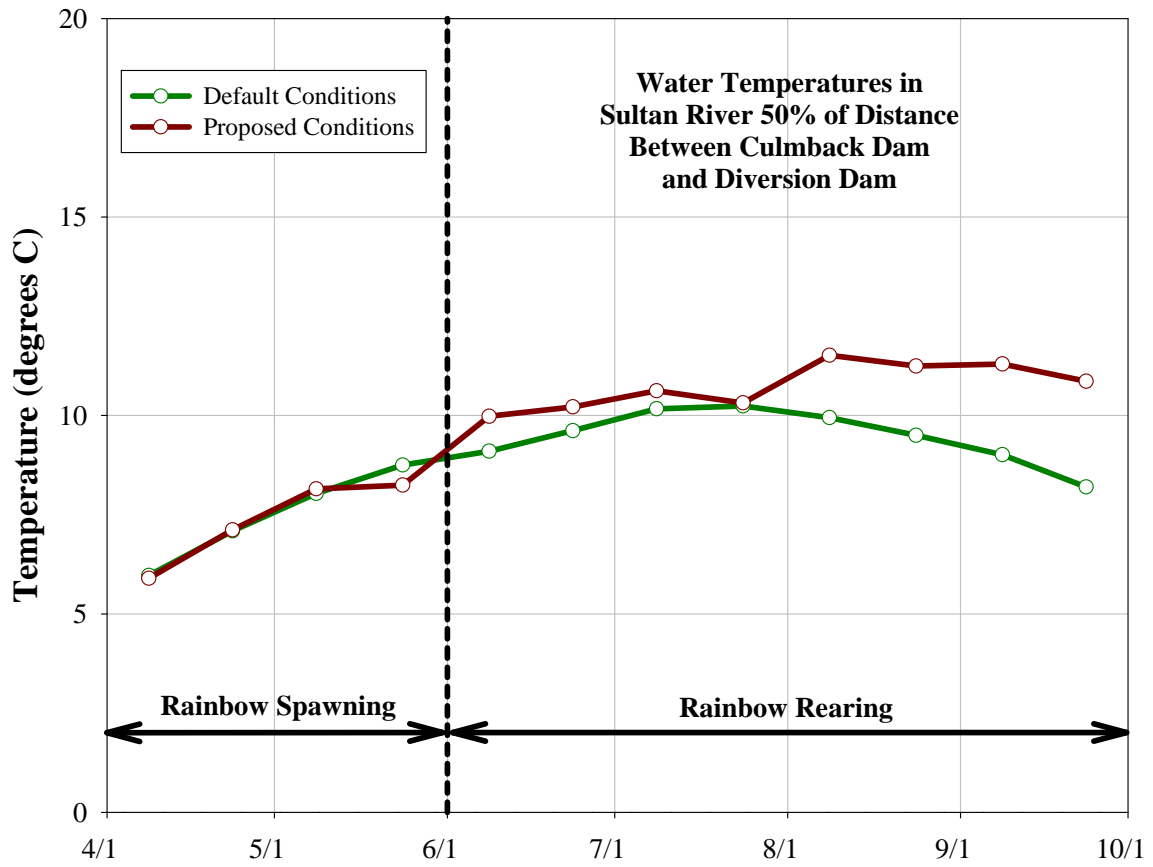
Timeframe	Release Flow (cfs)
July 1*-15	37
July 16-31	42
August 1-15	44
August 16-31	44
September 1-15	43
September 16-30	41
October	21
November	21
December	21
January	21
February	21
March	21
April 1-15	31
April 16-30	25
May 1-15	30
May 16-31	29
June 1-15	23
June 16-30	28

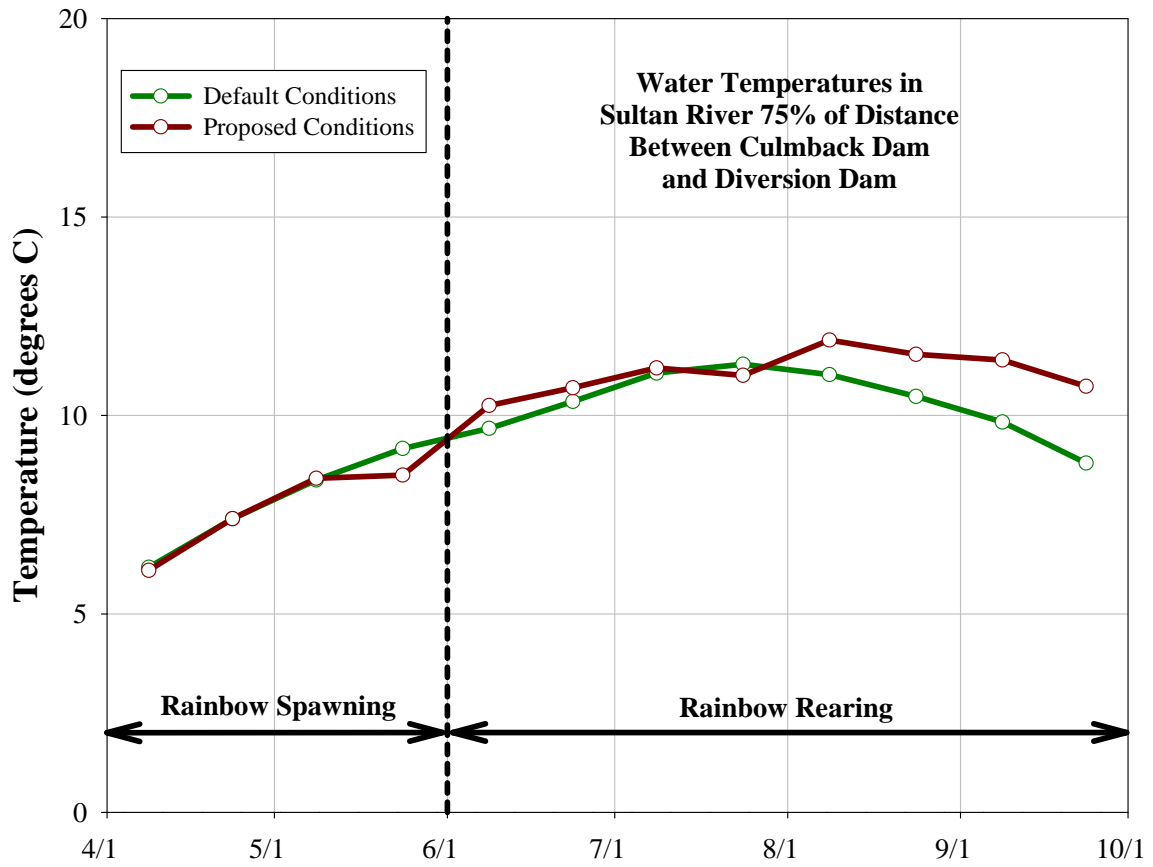
* July 1 begins the water year.

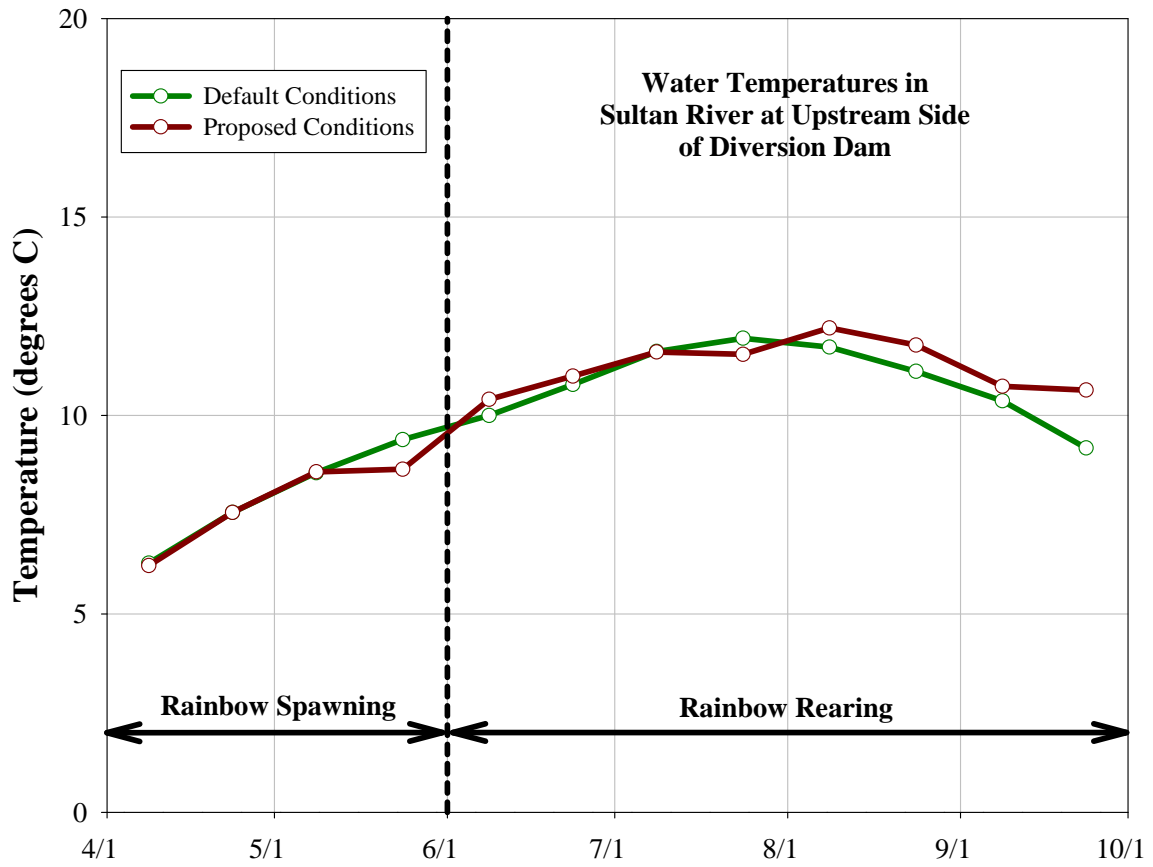
ATTACHMENT 2:
Reach 3 Flow and Temperature Data

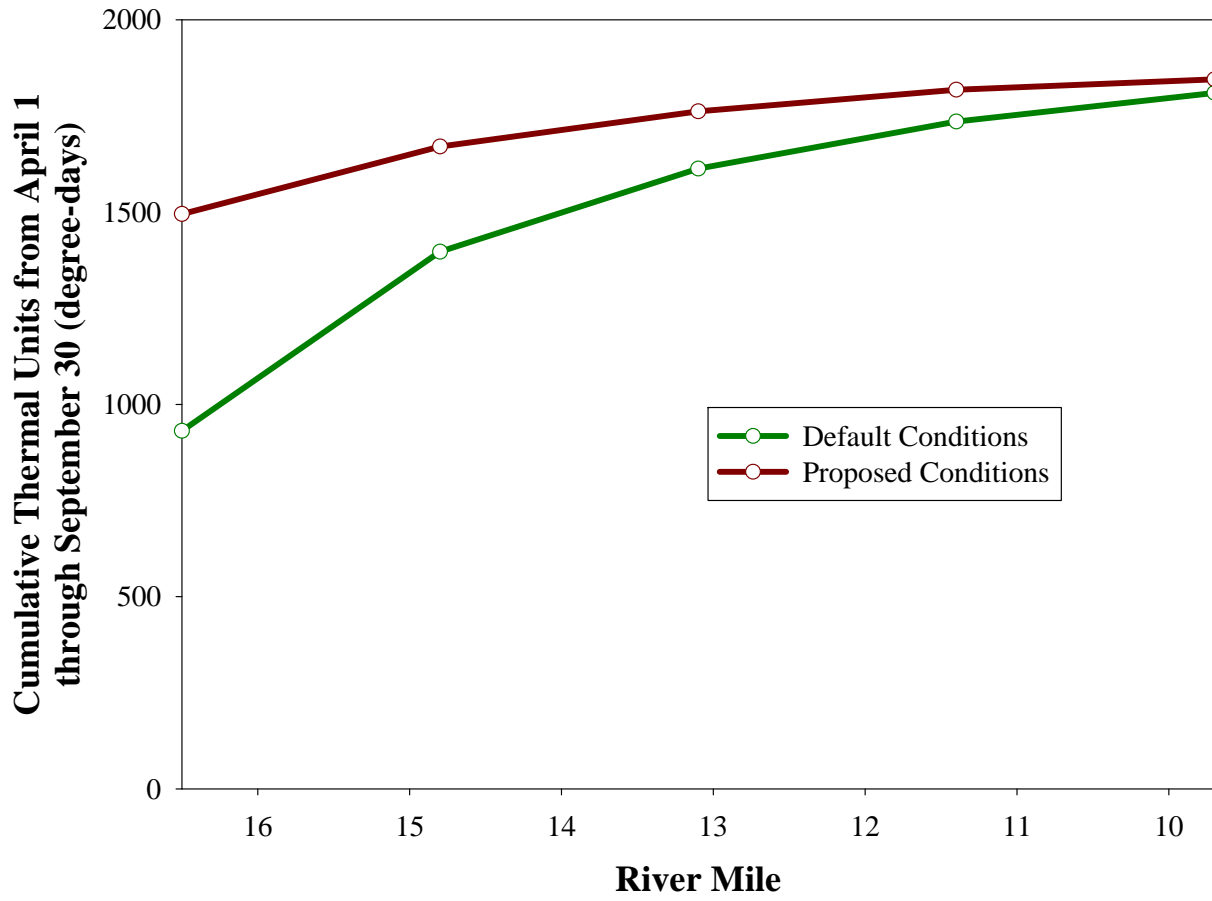












ATTACHMENT 3:
Consultation Documentation

Presler, Dawn

From: Presler, Dawn
Sent: Wednesday, March 19, 2014 1:45 PM
To: 'Jim Miller' (JMiller@ci.everett.wa.us); Mick Matheson; 'Leonetti, Frank' (frank.leonetti@snoco.org); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); Anne Savery; Tom O'Keefe; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'Maynard, Chris (ECY)' (cmay461@ecy.wa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us)
Cc: Binkley, Keith; Spangler, Brad; Moore, Kim
Subject: JHP (FERC No. 2157) - WY2014-2015 R3 flows
Attachments: WY2014-15 Reach 3 Flows.pdf

Dear ARC Members:

Per A-LA9 under the Reach 3 Component, attached is the “preliminary Flow Report” containing the recommended release schedule for Reach 3 for the 2014-2015 water year – same as last year. Please take the next 30-days for review and comment; comments, if any, are due by 4/18/14. If you have questions about the attached, please contact Keith.

Dawn Presler

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

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

Presler, Dawn

From: Binkley, Keith
Sent: Monday, April 07, 2014 10:49 AM
To: 'Anne Savery'
Cc: Presler, Dawn
Subject: RE: JHP (FERC No. 2157) - WY2014-2015 R3 flows

Hi Anne - sorry for the delay in my response. We will be sending out the WQMP report soon which has the information you are looking for. Thanks for your patience.

Keith

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

From: Anne Savery [<mailto:asavery@tulaliptribes-nsn.gov>]
Sent: Monday, April 07, 2014 8:48 AM
To: Binkley, Keith
Cc: Presler, Dawn
Subject: RE: JHP (FERC No. 2157) - WY2014-2015 R3 flows

Hi Kieth

Just checking in on this question below. Is there a report for Reach 3 flows/temperatures for last year? I'm interested to see if there was a dip in temperature as shown in the proposed temps/flows in mid July.

Thanks

Anne

From: Anne Savery
Sent: Monday, March 31, 2014 11:21 AM
To: Keith Binkley
Cc: Dawn Presler
Subject: FW: JHP (FERC No. 2157) - WY2014-2015 R3 flows

Hi Keith

Is there a report for the actual flows and temps that occurred in Reach 3 for 2013? I'm curious about the temperatures in the middle 2 weeks of July, where the graph of the proposed temps shows a dip. I'm wondering if there is a way to prevent the dip in temps during those 2 weeks. Does the 'actual' flow/temp regime vary from the 'proposed' in 2013?

Thanks

Anne

From: Presler, Dawn [DJPresler@SNOPUD.com]
Sent: Wednesday, March 19, 2014 1:44 PM
To: 'Jim Miller' (JMiller@ci.everett.wa.us); Mick Matheson; 'Leonetti, Frank' (frank.leonetti@snoco.org); 'Steven Fransen' (steven.m.fransen@noaa.gov); 'Tim_Romanski@fws.gov' (Tim_Romanski@fws.gov); Anne Savery; Tom O'Keefe; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'Maynard, Chris (ECY)' (cmay461@ecy.wa.gov); 'Loren Everest - USFS' (leverest@fs.fed.us)
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Presler, Dawn

From: Binkley, Keith
Sent: Wednesday, April 09, 2014 2:27 PM
To: 'Anne Savery'
Cc: Presler, Dawn
Subject: RE: JHP (FERC No. 2157) - WY2014-2015 R3 flows
Attachments: WTC- Reach 3 Temp Analysis_2013.xlsx

Hey Anne - here ya go.

Keith

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