SNOHOMISH COUNTY PUD
PUBLIC UTILITY DISTRICT NO. 1

Energizing Life in Our Communities

October 29, 2025

VIA ELECTRONIC FILING

Debbie-Anne A. Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Jackson Hydroelectric Project, FERC No. 2157
Operation Compliance Monitoring Plan WY 2024-2025 Annual Report
License Article 407

Dear Acting Secretary Reese:

Enclosed is Public Utility District No. 1 of Snohomish County's *Operation Compliance Monitoring Plan (OCMP) Annual Report for the Water Year July 2024 – June 2025* pursuant to License Article 407 for the Jackson Hydroelectric Project. The draft report was provided on September 5, 2025, to the Aquatic Resource Committee for a 30-day review and comment period. Consultation documentation is included in the report's Appendix C and D.

If you have any questions about the report, please contact Andrew McDonnell at (425) 783-1841.

Sincerely,

/s/ Andrew McDonnell

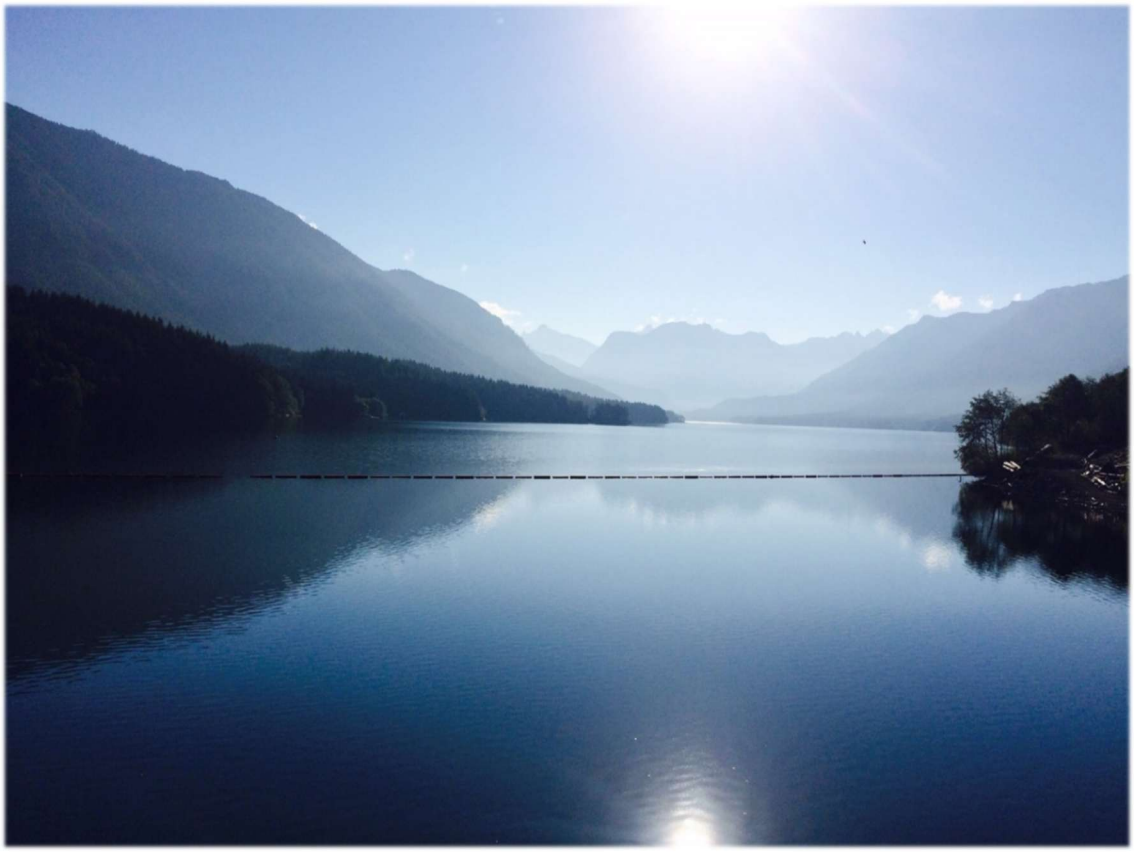
Andrew McDonnell
Manager, Natural Resources
(425) 783-1841
awmcdonnell@snopud.com

Enclosed: OCMP Annual Report

cc: ARC

Henry M. Jackson Hydroelectric Project

(FERC No. 2157)



Operation Compliance Monitoring Plan
Annual Report for
Water Year July 2024 – June 2025
(License Article 407)

Prepared By:

SNOHOMISH COUNTY PUD
PUBLIC UTILITY DISTRICT NO. 1

Everett, WA

October 2025

FINAL – This document has been prepared by Snohomish PUD. The document may be cited as:

Public Utility District No. 1 of Snohomish County (Snohomish PUD). 2025. Operation Compliance Monitoring Plan Annual Report for Water Year July 2024 through June 2025 (License Article 407) for the Henry M. Jackson Hydroelectric Project, FERC No. 2157. October 2025.

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ACRONYMS AND ABBREVIATIONS

A-LA	Aquatic License Article
ARC	Aquatic Resource Committee
cfs	cubic feet per second
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
RM	River Mile
SCADA	Supervisory Control and Data Acquisition
Snohomish PUD	Public Utility District No. 1 of Snohomish County
USGS	United States Geological Survey
WY	Water year

1.0 INTRODUCTION

Public Utility District No. 1 of Snohomish County (Snohomish PUD) 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. Snohomish PUD 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, Snohomish PUD 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 2024 – June 2025.

On September 5, 2025, a copy of the draft report was provided to the National Marine Fisheries Service, U.S. Forest Service, U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, Washington Department of Ecology (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 30-day review and comment period.

Spada Lake Reservoir data in tabular format are included in Appendix A. A summary table of process flow compliance requirements is included in Appendix B. Consultation documentation with the ARC regarding the draft report is included in Appendix C; responses to comments received from Ecology are included in Appendix D.

2.0 PROCESS FLOWS

The updated Process Flow Plan (PF Plan) identifies three compliance monitoring locations, one for each operational reach of the river (see Figure 1). The Reach 1 compliance location is at river mile (RM) 4.5 downstream of the powerhouse at USGS gaging station number 12138160. The Reach 2 compliance location is at RM 4.7 located immediately upstream of the powerhouse at Snohomish PUD's transducer. The Reach 3 compliance location is at RM 9.8 located upstream of the Diversion Dam at Snohomish PUD's transducer.

Snohomish PUD provided process flow events pursuant to the PF Plan on six occasions during the July 2024 – June 2025 timeframe to provide both biological and habitat benefits in each of the three reaches. These included, in chronological order:

1) a flushing of surficial fine sediment from the streambed in August 2024,
2) an upmigration flow for spawning salmonids in September 2024 (occurred during a week-long plant shutdown where all minimum instream flows were being met from releases at Culmback dam),
3) a nighttime outmigration flow (Reach 2 and 3) in March 2025,
4) a nighttime outmigration flow (Reach 1) coupled with a sediment flushing flow in March 2025,
5) a nighttime outmigration flow (Reach 2 and 3) coupled with a sediment flushing flow in April 2025, and
6) a nighttime outmigration flow (Reach 1) in April 2025.

The process flow events for the July 2024 – June 2025 timeframe are summarized, by river reache, in Table 1. Snohomish PUD 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 14. The full Process Flow Log (dating back to License issuance in September 2011) is posted to the web at: https://www.snopud.com/community-environment/environmental-commitment/stewardship/jackson-fish-program/fish-mgmt-plans/

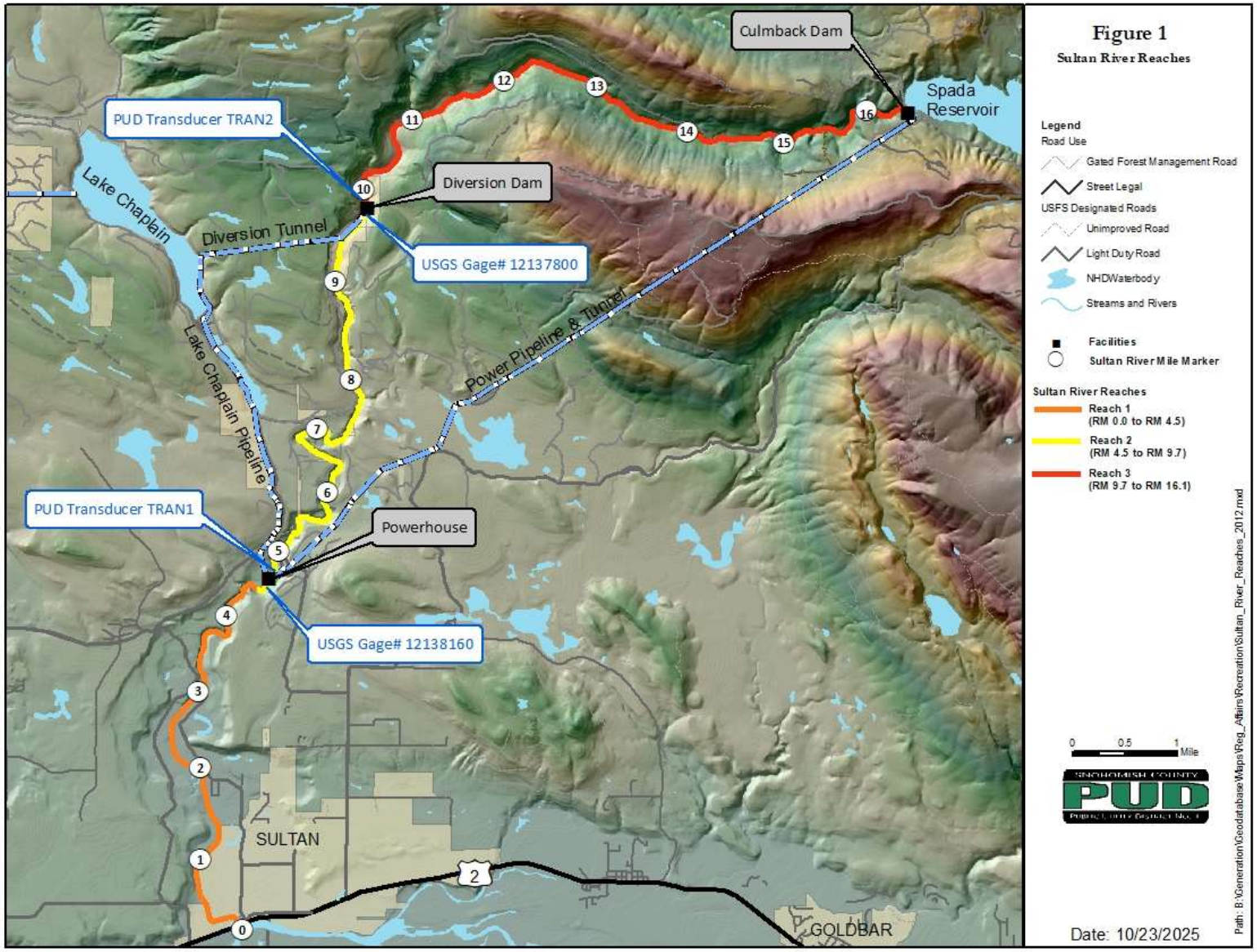

Figure 1. Sultan River reaches.

Table 1. Process Flow Log, July 2024 – June 2025.

Date[1]	Time[2]	Magnitude[3] (cfs)	Duration[4] (hrs)	Accretion[5] (cfs)	Notes[6]	PF Type[7]	Frequency and Magnitude Requirements[8]	Compliance Requirements Met
8/17/2024	10:30-16:30	R3 – 671 (average) 621 to 721 cfs	6 hours greater than 600 cfs	Estimated at 10 cfs	Reference Figure 2	F	2 times per year. Greater than 400 cfs for 6 hours or 600 cfs for 3 hours	Yes
8/17/2024	12:15-18:15	R2 – 798 (average) 716 to 853 cfs	6 hours greater than 700 cfs	Estimated at 15 cfs	Reference Figure 3	F	2 times per year. Greater than 500 cfs for 6 hours or 700 cfs for 3 hours	Yes
8/17-18/2024	12:00-01:30	R1 – 1,669 cfs (average) 1,520 to 1,810 cfs	13.5 hours greater than 1,500 cfs	Estimated at 25 cfs	Reference Figure 4	F	2 times per year. Greater than 1,500 cfs If Spada Reservoir is below 1,420 feet msl then 1,200 for 6 hours	Yes
9/7–8/2024	09:30-15:00	R3 – 509 (average) 317-728	18 hours greater than 300 cfs	Estimated at 8 cfs	Reference Figure 5	U	1 time per year. 300 to 500 cfs for 6 hours.	Yes
9/7–8/2024	12:30-15:00	R2 – 631 (average) 413 to 762 cfs	26.5 hours greater than 400 cfs	Estimated at 13 cfs	Reference Figure 6	U	1 time per year. 400 to 600 cfs for 6 hours.	Yes
9/7/2024	12:00-18:00	R1 – 844 (average) 805 to 858 cfs	6 hours greater than 800 cfs	Estimated at 13 cfs	Reference Figure 7	U	1 time per year. 800 to 1,200 cfs for 6 hours.	Yes
3/21-22/2025	18:00-00:00	R3 – 479 (average), Range 456 to 492 cfs	30 hours greater than 200 cfs	Estimated at 65 cfs	Reference Figure 8	O	2 times per year. 900 to 1,200 cfs for 6 hours.	Yes
3/21-22/2025	20:00-06:00	R2 – 723 (average), Range 678 to 744 cfs	10 hours greater than 400 cfs	Estimated at 70 cfs	Reference Figure 9	O	2 times per year. 400 to 600 cfs for 6 hours.	Yes

[1] Start Date of Event (MM/DD/YYYY)
[2] Start Time-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, Released or Natural
[7] Channel Forming (CF), Channel Maintenance (CM), Flushing (F), Outmigration (O), Upmigration (U)
[8] See Appendix B Detailed Information

Date[1]	Time[2]	Magnitude[3] (cfs)	Duration[4] (hrs)	Accretion[5] (cfs)	Notes[6]	PF Type[7]	Frequency and Magnitude Requirements[8]	Compliance Requirements Met
3/23-25/2025	12:00-19:00	R1 – 1,837 (average) Range 1,500 – 2,236 cfs	55 hours greater than 1,500 cfs	Estimated at 70 cfs	Reference Figure 10	F, O	(F) - 2 times per year. Greater than 1,500 cfs If Spada Reservoir is below 1,420 feet msl then 1,200 for 6 hours. (O) - 2 times per year. 800 to 1,200 cfs for 6 hours.	Yes
4/1-4/2025	00:00-06:00	R2 – 731 (average), Range 666 – 781 cfs	78 hours greater than 600 cfs	Estimated at 31 cfs	Reference Figure 11	F, O	(F) -2 times per year. Greater than 500 cfs for 6 hours or 700 cfs for 3 hours. (O) – 2 times per year. 400 to 600 cfs for 6 hours.	Yes
4/1-9/2025	00:00-00:00	R3 – 462 (average) Range 402-512 cfs	216 hours greater than 400 cfs	Estimated at 22 cfs	Reference Figure 12	F, O	(F) -2 times per year. Greater than 400 cfs for 6 hours or 600 cfs for 3 hours. (O) – 2 times per year. 200 to 400 cfs for 6 hours.	Yes
4/17-18/2025	20:00-4:00	R1 – 829 (average), Range 818 to 844 cfs	8 hours with flows greater than 800 cfs	Estimated at 70 cfs	Reference Figure 13	O	2 times per year. 900 to 1,200 cfs for 6 hours.	Yes

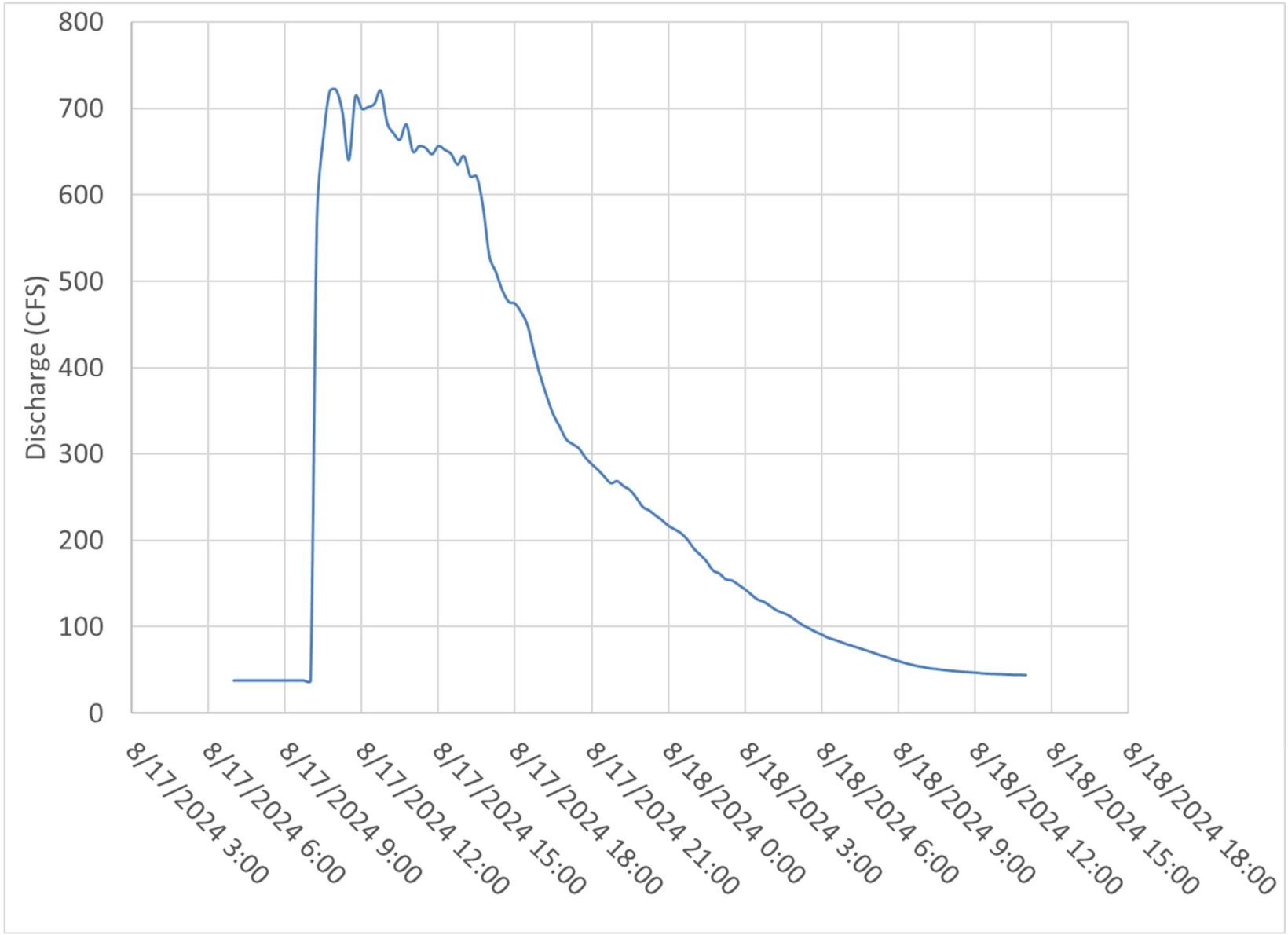

Figure 2. Sultan River immediately upstream of Diversion Dam – 8/17–18/2024.

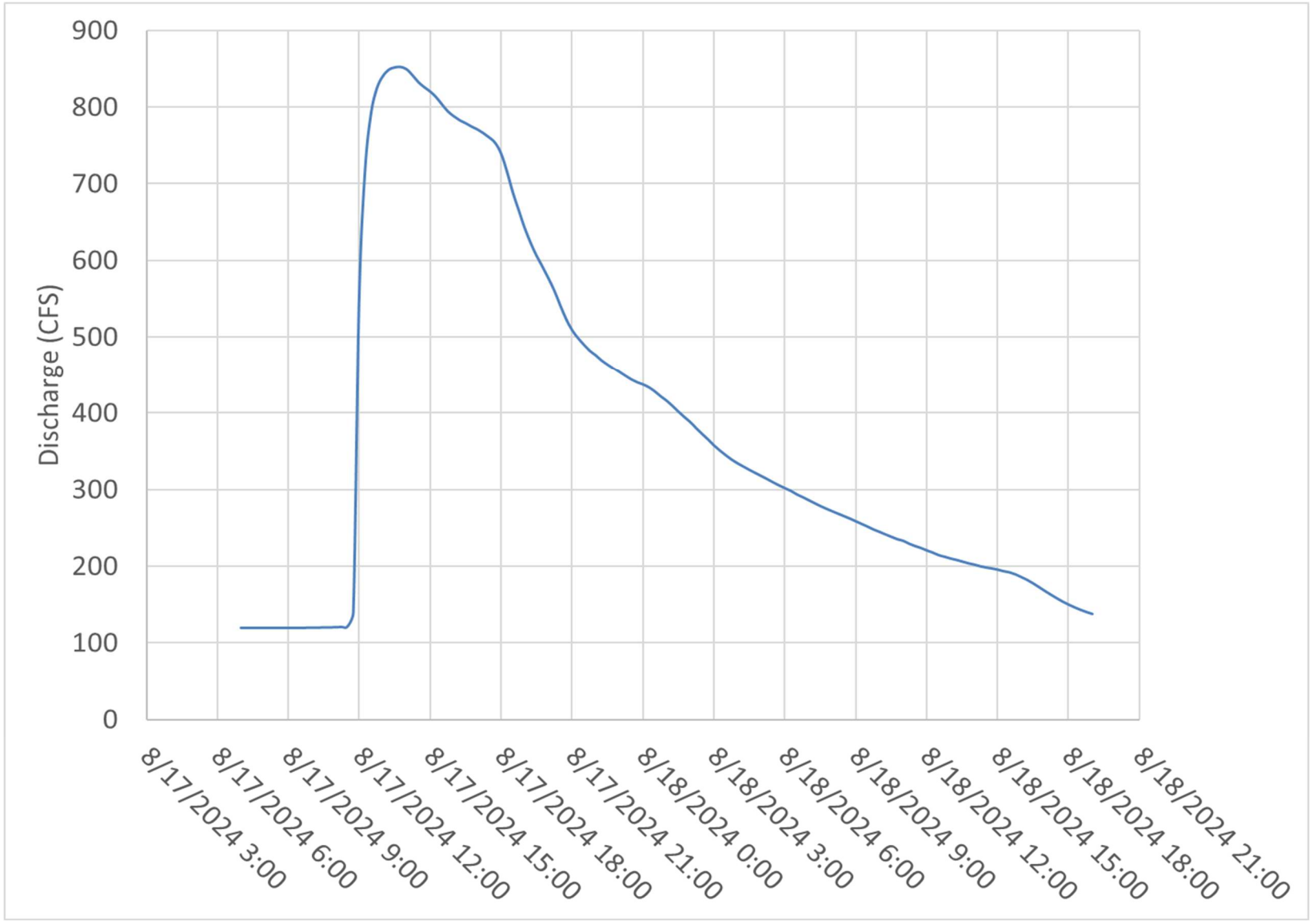

Figure 3. Sultan River immediately upstream of Powerhouse – 8/17–18/2024.

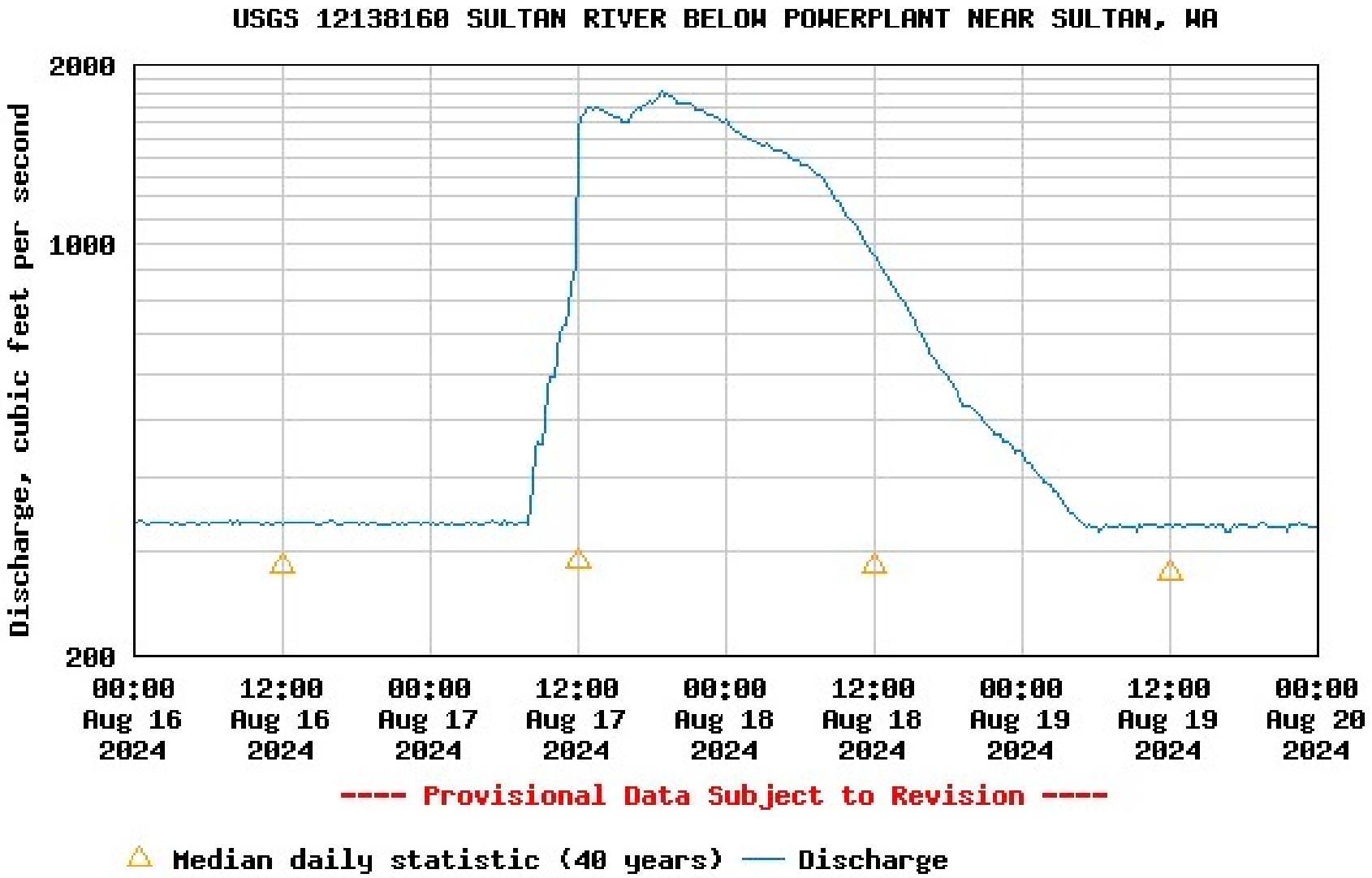

Figure 4. **Sultan River immediately downstream of Powerhouse – 8/17–18/2024.**

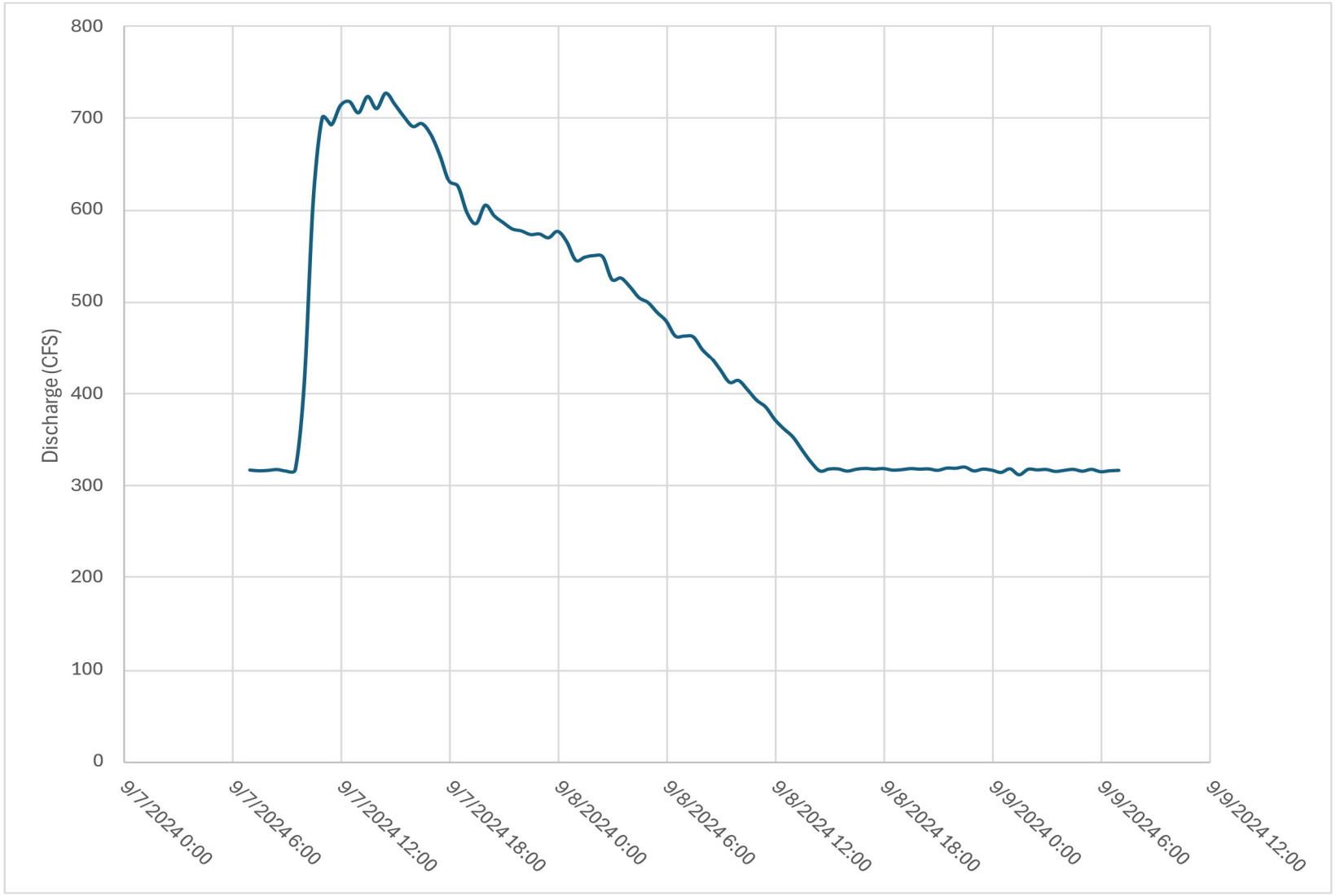

Figure 5. Sultan River immediately upstream of Diversion Dam – 9/7–8/2024.

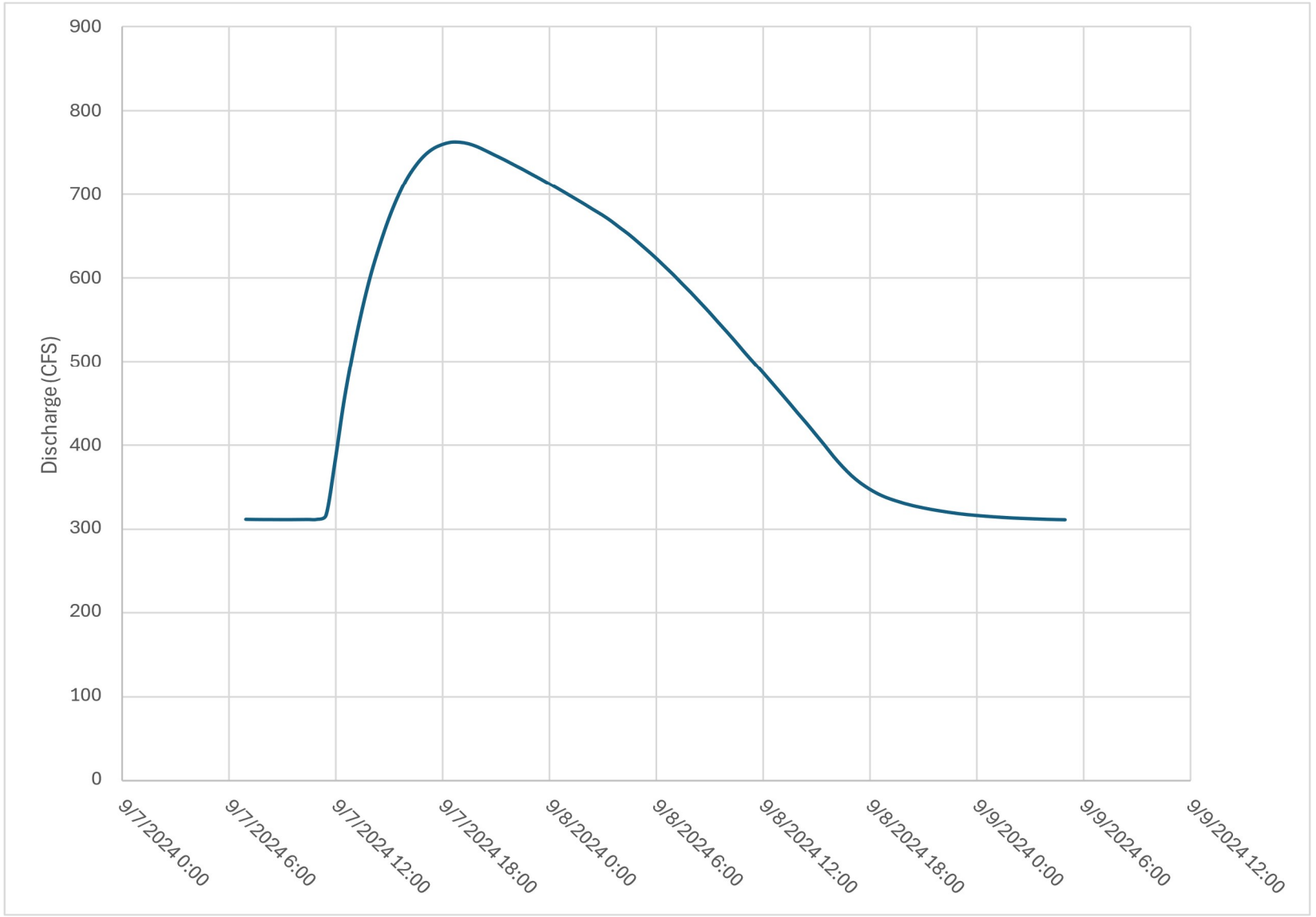

Figure 6. Sultan River immediately upstream of Powerhouse – 9/7–9/2024.

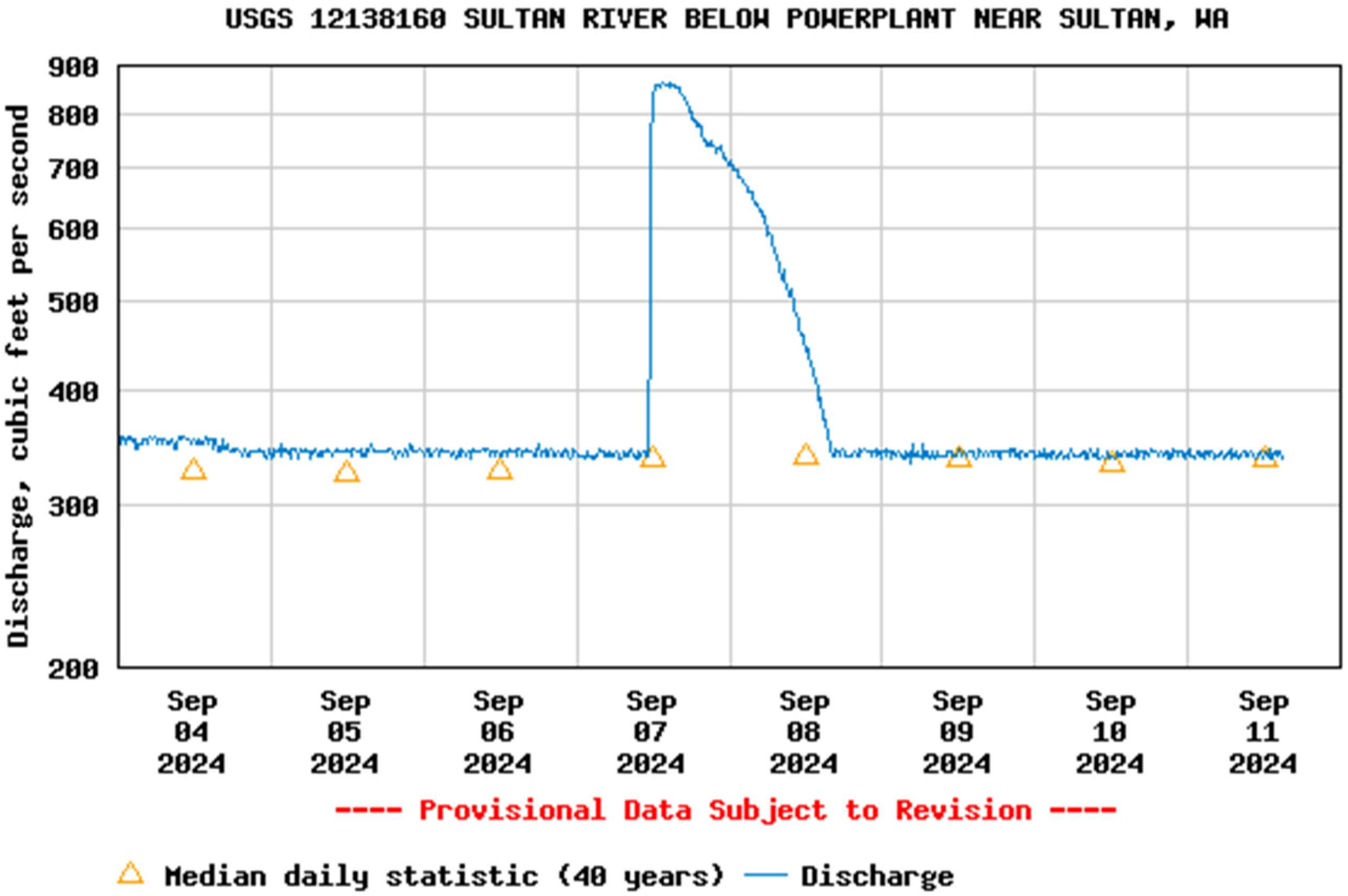

Figure 7. **Sultan River immediately downstream of Powerhouse – 9/7/2024.**

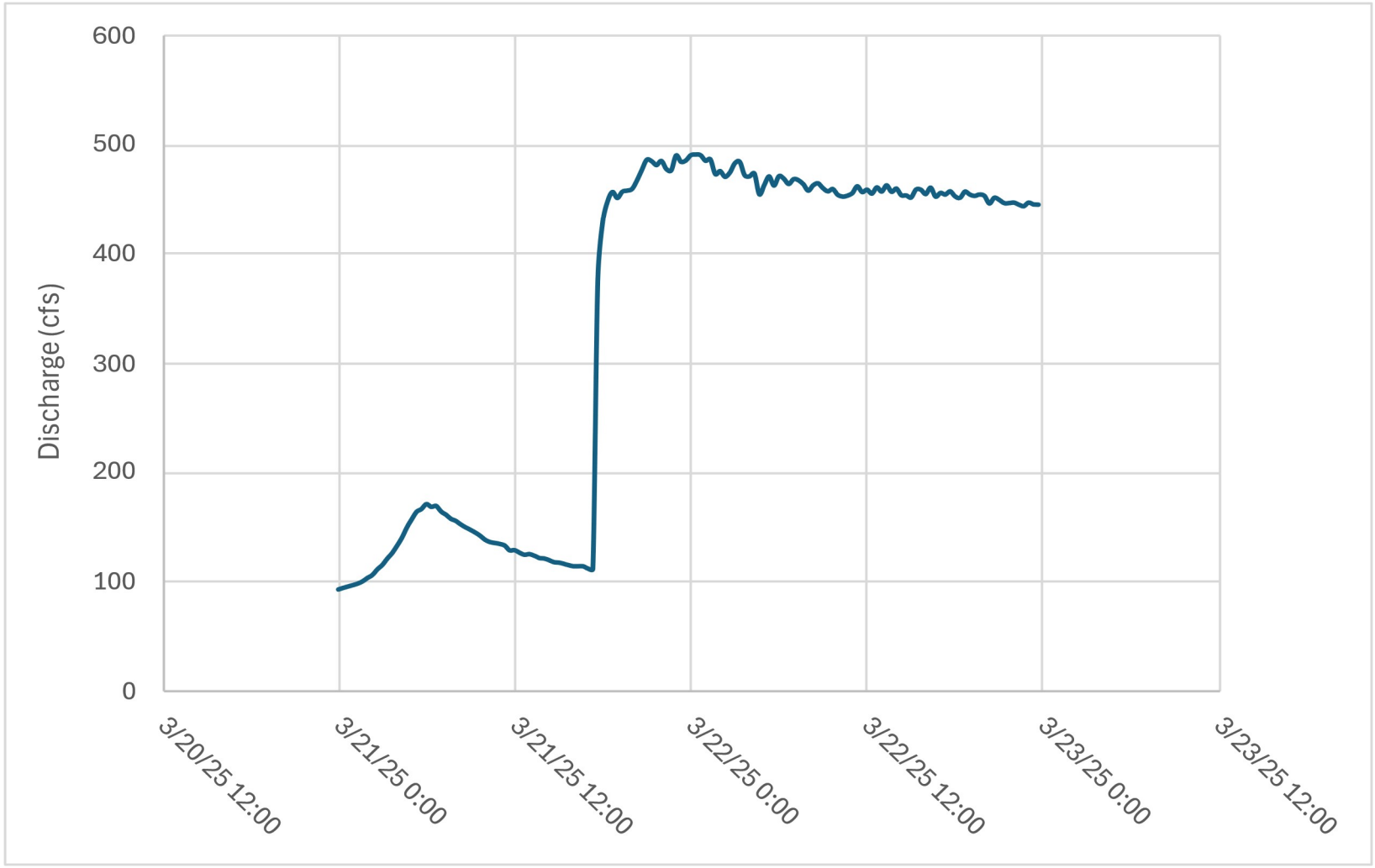

Figure 8. Sultan River immediately upstream of Diversion Dam – 3/21–22/2025.

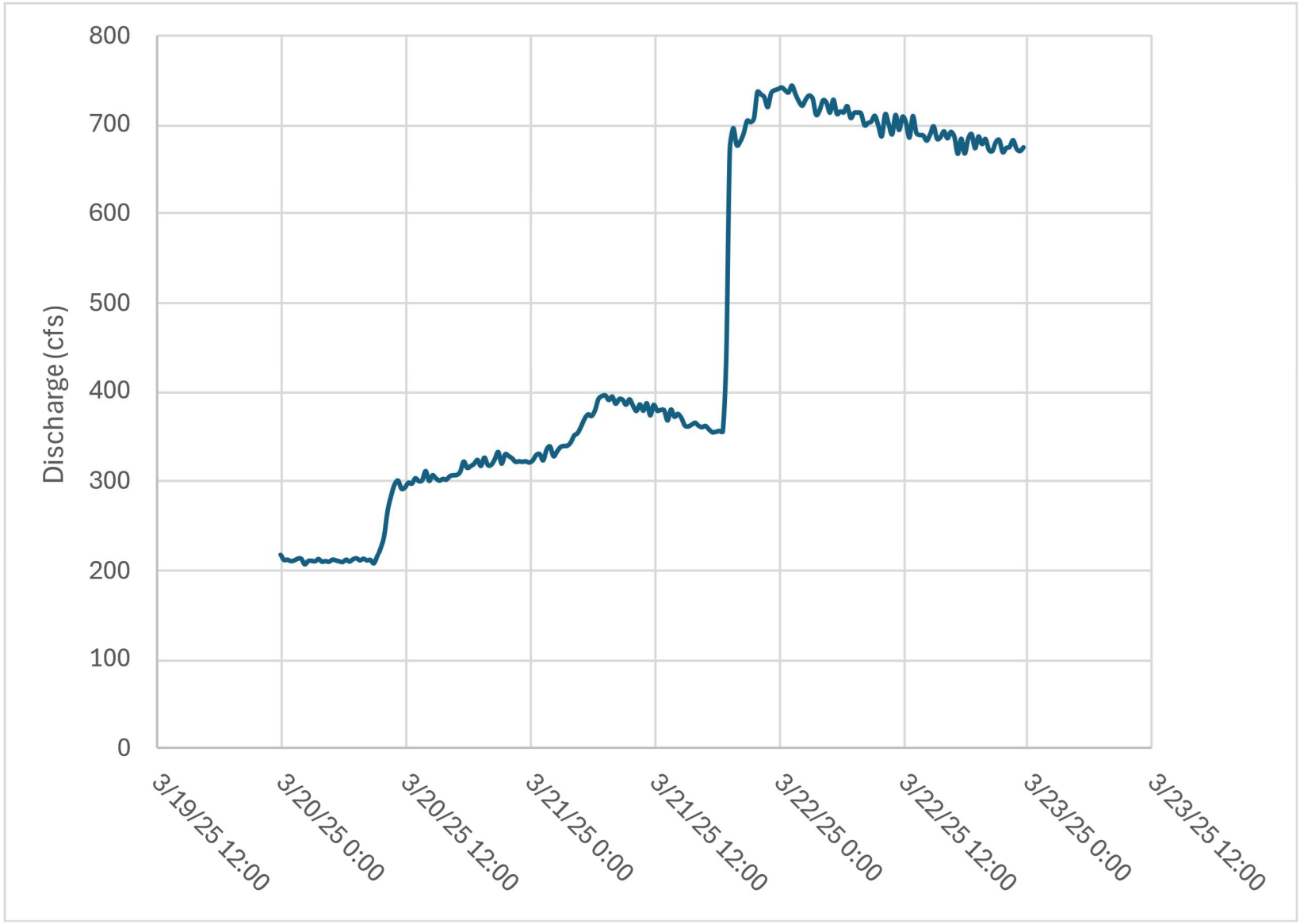

Figure 9. Sultan River immediately upstream of Powerhouse – 3/21–22/2025.

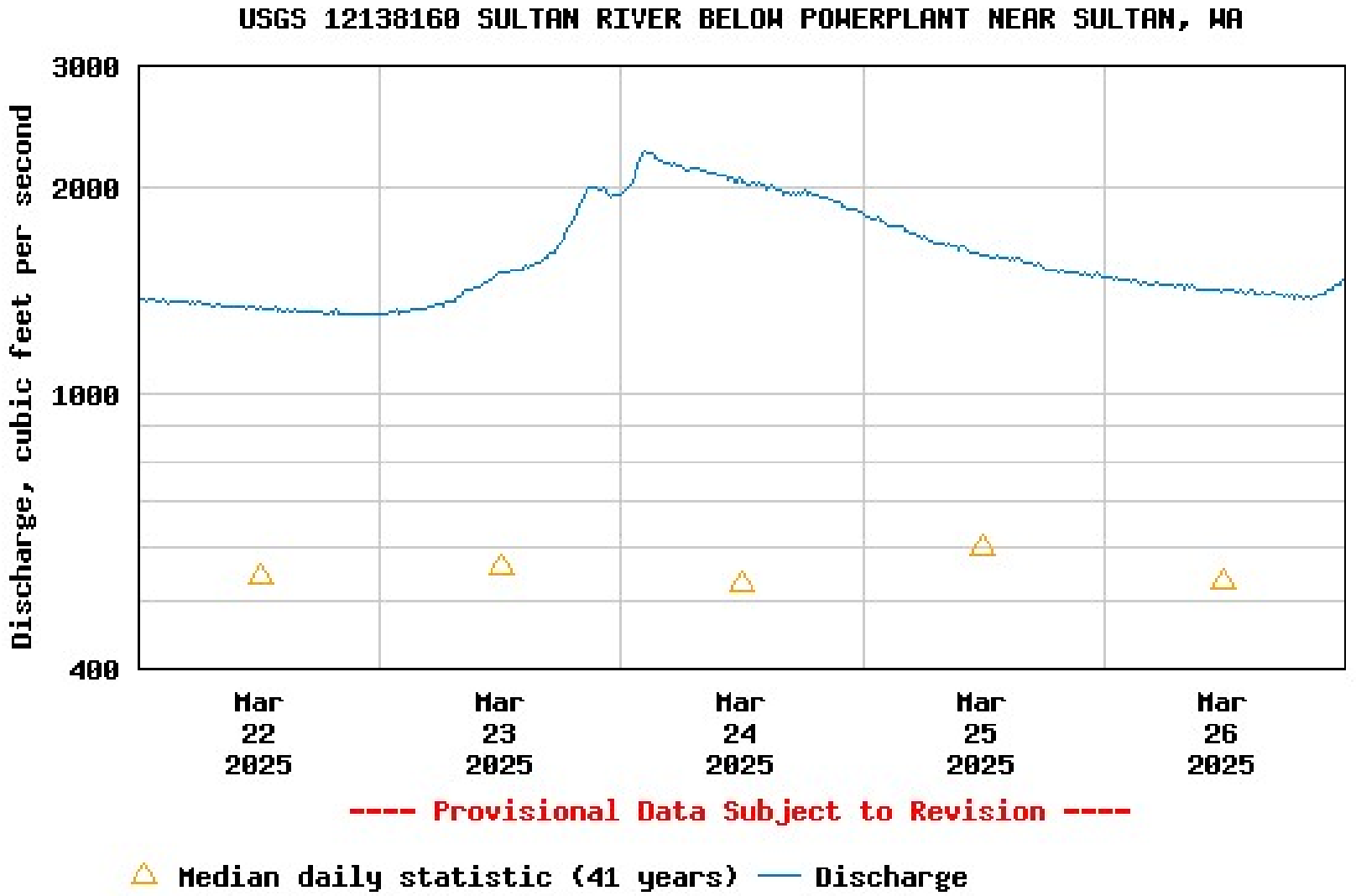

Figure 10. **Sultan River immediately downstream of Powerhouse flow – 3/23–25/2025.**

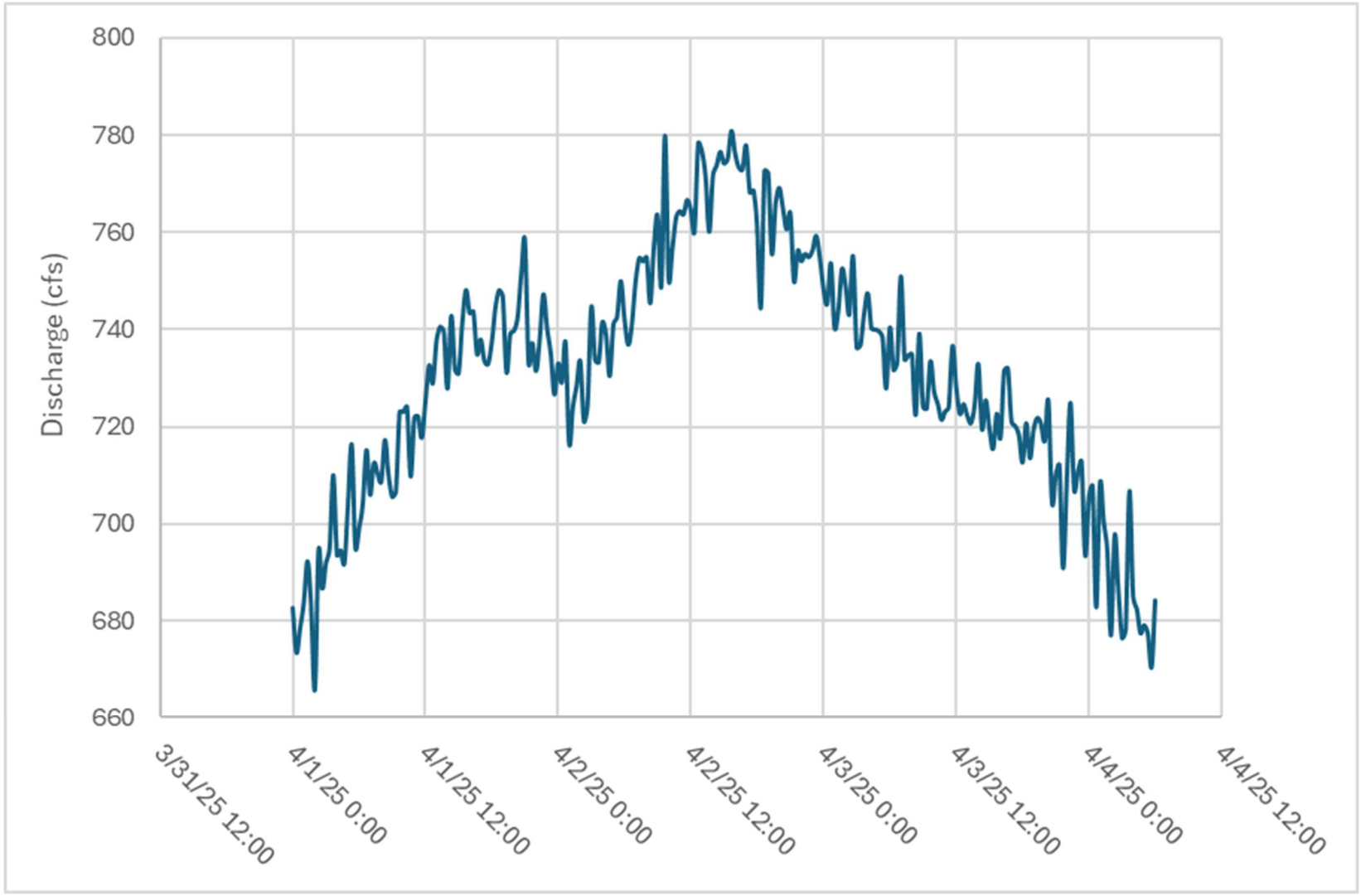

Figure 11. Sultan River immediately Upstream of Powerhouse Flow – 4/1–4/2025.

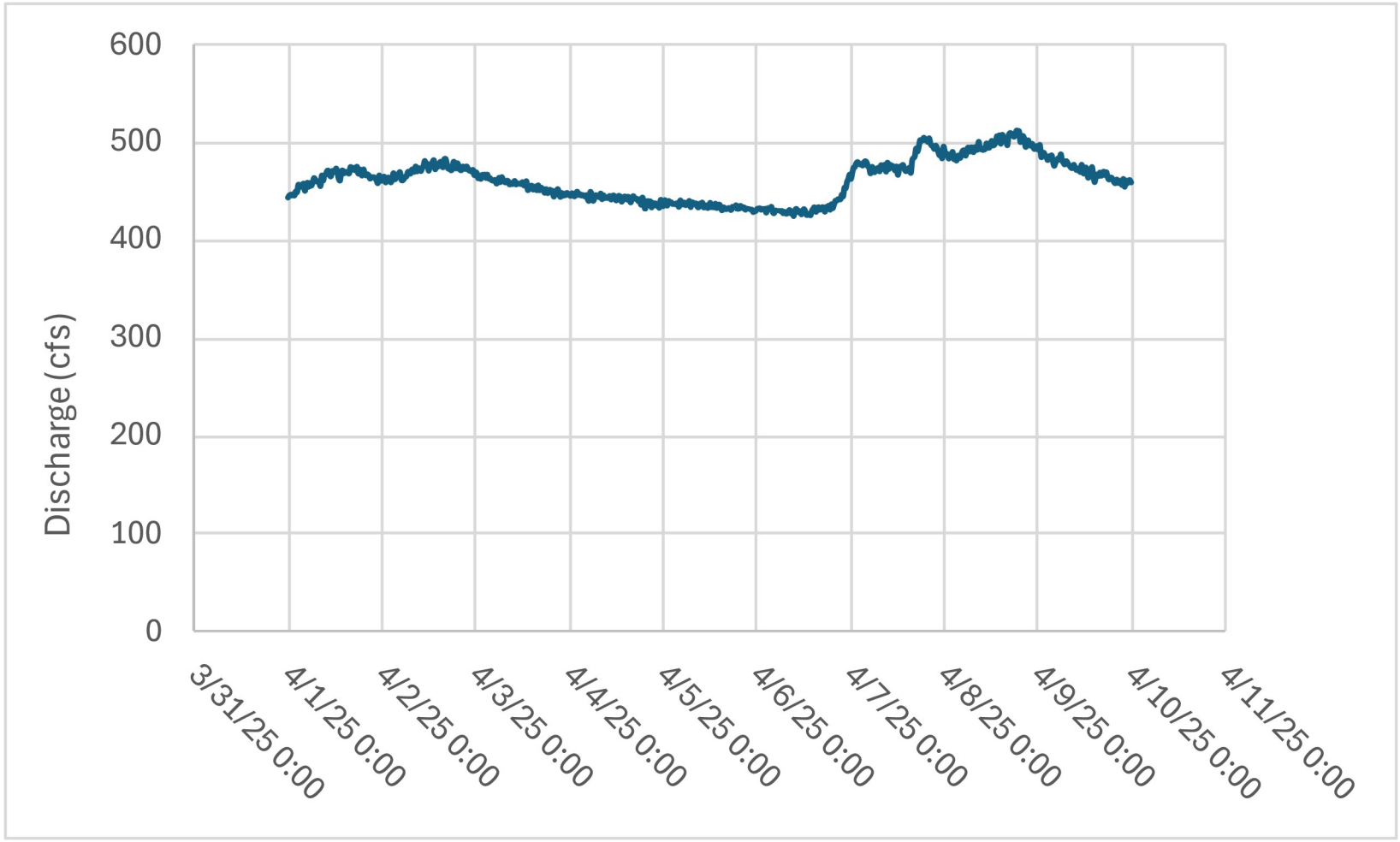

Figure 12. Sultan River immediately Upstream of Diversion Dam Flow – 4/1 – 9/2025.

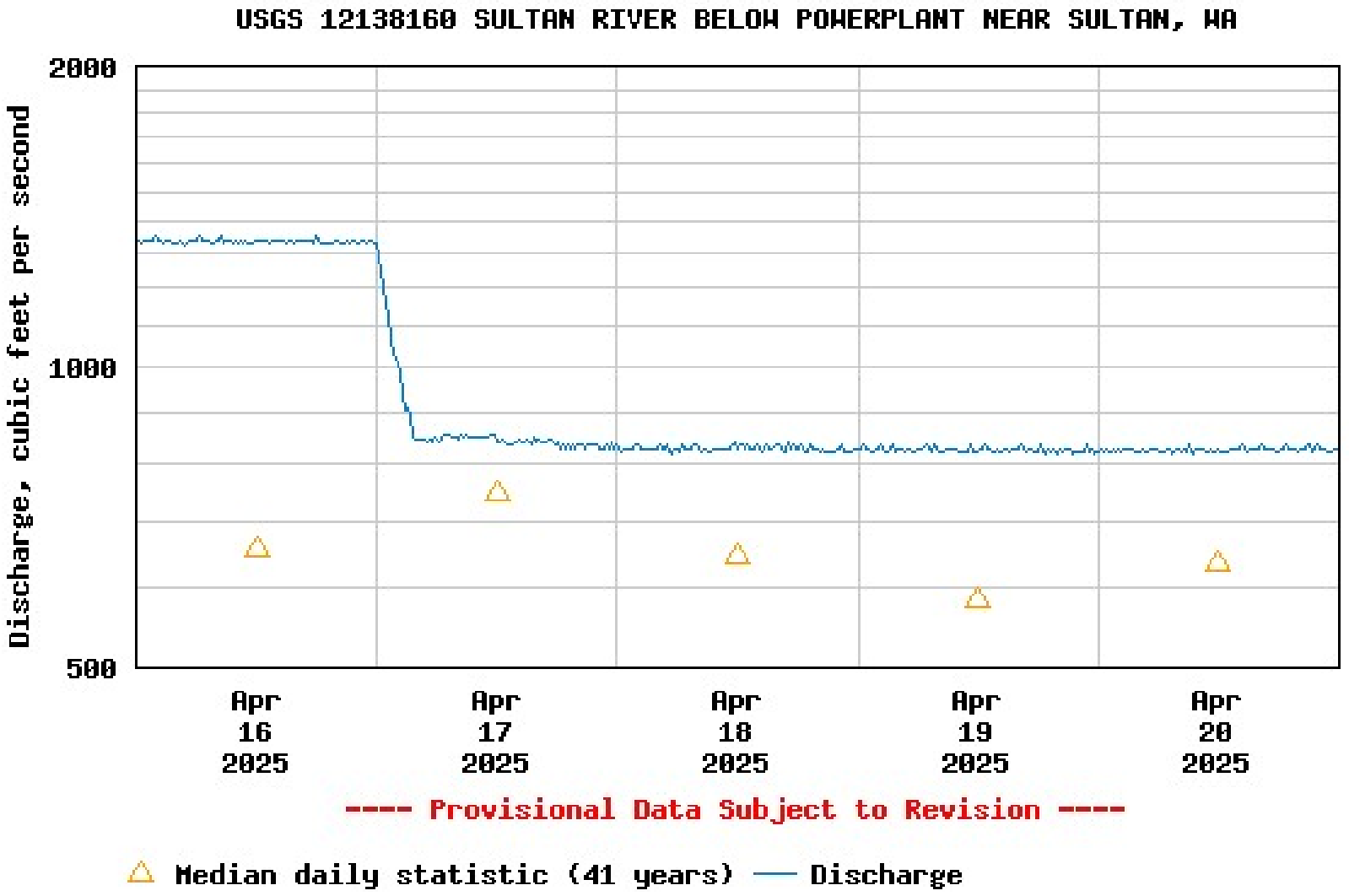

Figure 13. **Sultan River immediately Downstream of Powerhouse Flow – 4/17–18/2025.**

3.0 SPADA LAKE RESERVOIR WATER SURFACE ELEVATIONS

During this reporting period, Spada Lake Reservoir daily water surface elevations ranged between 1,413.4 and 1,449.6 feet msl, with the low on October 15, 2024, and the high on July 2, 2024. Figure 14 displays the daily water surface elevations of Spada Lake Reservoir, and Appendix A contains the data in tabular format.

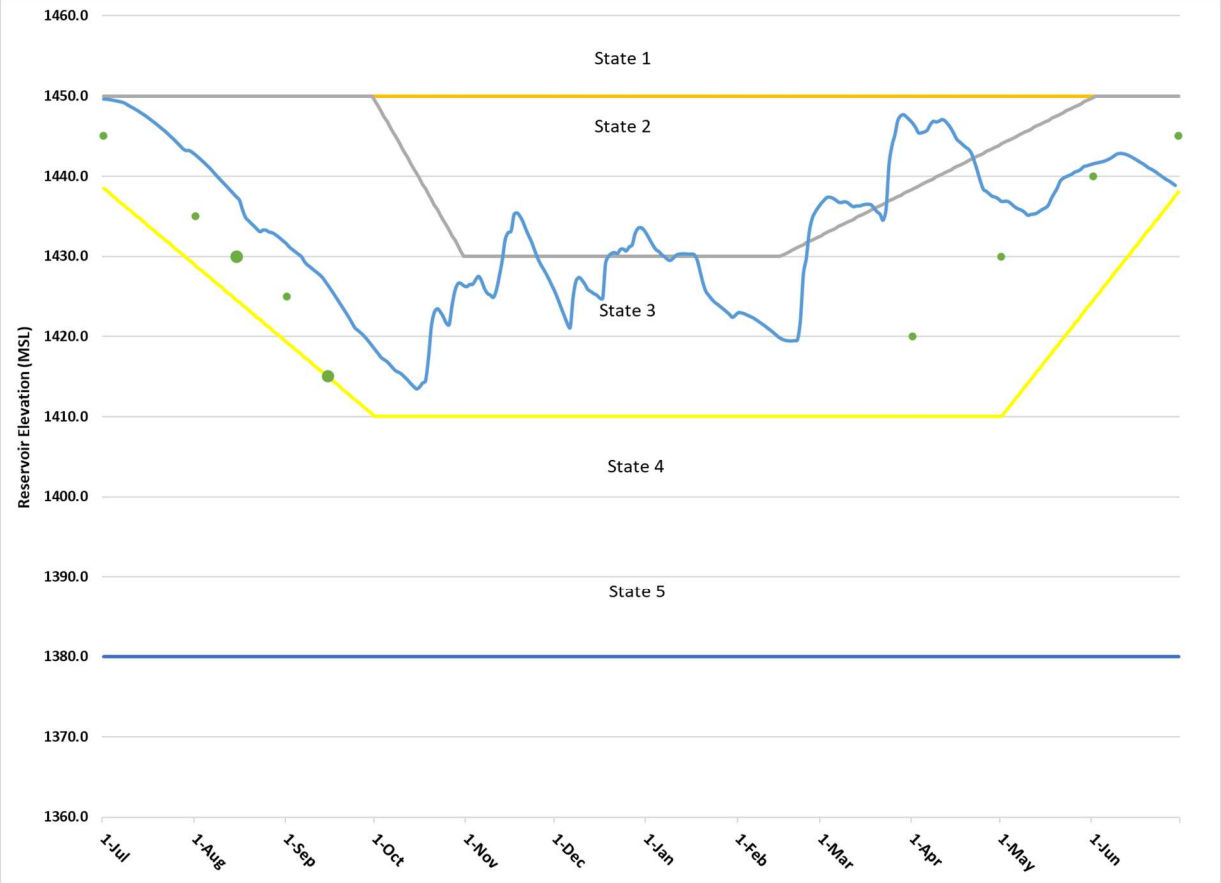

Figure 14. Water surface elevation, Spada Lake Reservoir, July 1, 2024 – June 30, 2025.

4.0 DEVIATIONS FROM STATE 3

License Article 406 requires:

> *When Spada Lake is in State 3, subject to meeting the City of Everett's water supply requirements and the 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... After the temperature conditioning structure is installed and operational, the licensee shall maintain a minimum impoundment water surface elevation in Spada Lake above 1,415 feet msl from August 16 through September 15.*[9]

During August 16 – September 15, 2024, the water surface in Spada Lake Reservoir did not go below the target elevation of 1,415 feet msl.

[9] *Public Utility District No. 1 of Snohomish County,* 137 FERC ¶ 61,221 (2011), Order Denying Rehearing and Granting Clarification, issued December 15, 2011.

[9] Given fluctuations of the reservoir and corresponding oscillations around the target elevation, the Snohomish PUD rounds to the nearest mean daily elevation.

APPENDIX A

Spada Lake Reservoir Daily Elevations Tabular Format

Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)
7/1	1449.6	8/1	1442.6	9/1	1431.5
7/2	1449.6	8/2	1442.3	9/2	1431.1
7/3	1449.5	8/3	1442.0	9/3	1430.8
7/4	1449.4	8/4	1441.7	9/4	1430.5
7/5	1449.4	8/5	1441.3	9/5	1430.2
7/6	1449.3	8/6	1440.9	9/6	1429.9
7/7	1449.2	8/7	1440.5	9/7	1429.3
7/8	1449.1	8/8	1440.1	9/8	1428.9
7/9	1448.9	8/9	1439.7	9/9	1428.6
7/10	1448.7	8/10	1439.3	9/10	1428.3
7/11	1448.5	8/11	1438.9	9/11	1428.0
7/12	1448.2	8/12	1438.6	9/12	1427.7
7/13	1448.0	8/13	1438.2	9/13	1427.4
7/14	1447.8	8/14	1437.8	9/14	1426.9
7/15	1447.5	8/15	1437.4	9/15	1426.3
7/16	1447.3	8/16	1437.0	9/16	1425.8
7/17	1447.0	8/17	1435.8	9/17	1425.2
7/18	1446.7	8/18	1434.8	9/18	1424.7
7/19	1446.4	8/19	1434.4	9/19	1424.1
7/20	1446.1	8/20	1434.1	9/20	1423.5
7/21	1445.8	8/21	1433.7	9/21	1423.0
7/22	1445.5	8/22	1433.3	9/22	1422.4
7/23	1445.1	8/23	1433.0	9/23	1421.7
7/24	1444.8	8/24	1433.3	9/24	1421.1
7/25	1444.5	8/25	1433.2	9/25	1420.8
7/26	1444.1	8/26	1433.0	9/26	1420.4
7/27	1443.7	8/27	1432.9	9/27	1420.1
7/28	1443.3	8/28	1432.7	9/28	1419.7
7/29	1443.2	8/29	1432.4	9/29	1419.2
7/30	1443.2	8/30	1432.1	9/30	1418.8
7/31	1442.9	8/31	1431.8		

Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)
10/1	1418.3	11/1	1426.2	12/1	1425.4
10/2	1417.8	11/2	1426.5	12/2	1424.5
10/3	1417.3	11/3	1426.5	12/3	1423.5
10/4	1417.1	11/4	1427.1	12/4	1422.5
10/5	1416.8	11/5	1427.5	12/5	1421.6
10/6	1416.4	11/6	1426.9	12/6	1421.1
10/7	1416.0	11/7	1425.9	12/7	1424.9
10/8	1415.7	11/8	1425.3	12/8	1426.9
10/9	1415.5	11/9	1425.1	12/9	1427.3
10/10	1415.2	11/10	1424.9	12/10	1427.0
10/11	1414.9	11/11	1425.8	12/11	1426.5
10/12	1414.5	11/12	1427.5	12/12	1425.8
10/13	1414.1	11/13	1429.5	12/13	1425.6
10/14	1413.7	11/14	1432.1	12/14	1425.3
10/15	1413.4	11/15	1432.9	12/15	1425.1
10/16	1413.7	11/16	1433.1	12/16	1424.8
10/17	1414.2	11/17	1435.2	12/17	1424.7
10/18	1414.4	11/18	1435.4	12/18	1429.2
10/19	1417.3	11/19	1435.0	12/19	1430.0
10/20	1421.3	11/20	1434.3	12/20	1430.3
10/21	1423.0	11/21	1433.3	12/21	1430.4
10/22	1423.4	11/22	1432.5	12/22	1430.3
10/23	1423.1	11/23	1431.7	12/23	1430.8
10/24	1422.4	11/24	1430.7	12/24	1430.9
10/25	1421.7	11/25	1429.7	12/25	1430.6
10/26	1421.4	11/26	1429.0	12/26	1431.1
10/27	1423.9	11/27	1428.3	12/27	1431.4
10/28	1425.7	11/28	1427.7	12/28	1432.8
10/29	1426.6	11/29	1427.0	12/29	1433.5
10/30	1426.6	11/30	1426.2	12/30	1433.6
10/31	1426.3			12/31	1433.2

Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)
1/1	1432.7	2/1	1422.9	3/1	1436.6
1/2	1432.0	2/2	1422.9	3/2	1437.0
1/3	1431.4	2/3	1422.8	3/3	1437.3
1/4	1430.8	2/4	1422.6	3/4	1437.3
1/5	1430.6	2/5	1422.5	3/5	1437.2
1/6	1430.2	2/6	1422.3	3/6	1437.0
1/7	1429.9	2/7	1422.1	3/7	1436.7
1/8	1429.6	2/8	1421.8	3/8	1436.7
1/9	1429.5	2/9	1421.5	3/9	1436.8
1/10	1429.8	2/10	1421.3	3/10	1436.7
1/11	1430.1	2/11	1421.0	3/11	1436.4
1/12	1430.3	2/12	1420.7	3/12	1436.2
1/13	1430.3	2/13	1420.4	3/13	1436.3
1/14	1430.3	2/14	1420.1	3/14	1436.3
1/15	1430.2	2/15	1419.8	3/15	1436.4
1/16	1430.2	2/16	1419.6	3/16	1436.5
1/17	1430.2	2/17	1419.5	3/17	1436.5
1/18	1429.5	2/18	1419.4	3/18	1436.4
1/19	1428.1	2/19	1419.4	3/19	1436.0
1/20	1426.6	2/20	1419.5	3/20	1435.5
1/21	1425.6	2/21	1419.5	3/21	1435.2
1/22	1425.1	2/22	1422.0	3/22	1434.5
1/23	1424.6	2/23	1427.7	3/23	1435.8
1/24	1424.2	2/24	1429.7	3/24	1441.3
1/25	1424.0	2/25	1433.0	3/25	1443.7
1/26	1423.7	2/26	1434.7	3/26	1445.1
1/27	1423.4	2/27	1435.5	3/27	1446.9
1/28	1423.1	2/28	1436.1	3/28	1447.5
1/29	1422.7			3/29	1447.6
1/30	1422.4			3/30	1447.3
1/31	1422.6			3/31	1447.0

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
4/1	1446.6		5/1	1436.8		6/1	1441.5
4/2	1446.0		5/2	1436.8		6/2	1441.6
4/3	1445.4		5/3	1436.8		6/3	1441.7
4/4	1445.4		5/4	1436.7		6/4	1441.7
4/5	1445.5		5/5	1436.3		6/5	1441.8
4/6	1445.7		5/6	1436.0		6/6	1442.0
4/7	1446.4		5/7	1435.9		6/7	1442.2
4/8	1446.8		5/8	1435.7		6/8	1442.4
4/9	1446.7		5/9	1435.4		6/9	1442.7
4/10	1446.8		5/10	1435.1		6/10	1442.8
4/11	1447.0		5/11	1435.2		6/11	1442.8
4/12	1446.9		5/12	1435.2		6/12	1442.7
4/13	1446.4		5/13	1435.3		6/13	1442.6
4/14	1445.9		5/14	1435.6		6/14	1442.4
4/15	1445.3		5/15	1435.8		6/15	1442.2
4/16	1444.6		5/16	1436.0		6/16	1442.0
4/17	1444.2		5/17	1436.4		6/17	1441.7
4/18	1443.9		5/18	1437.2		6/18	1441.5
4/19	1443.6		5/19	1437.8		6/19	1441.3
4/20	1443.3		5/20	1438.5		6/20	1441.0
4/21	1442.8		5/21	1439.3		6/21	1440.8
4/22	1441.7		5/22	1439.7		6/22	1440.6
4/23	1440.6		5/23	1439.9		6/23	1440.3
4/24	1439.3		5/24	1440.0		6/24	1440.1
4/25	1438.3		5/25	1440.2		6/25	1439.8
4/26	1438.1		5/26	1440.5		6/26	1439.5
4/27	1437.8		5/27	1440.6		6/27	1439.3
4/28	1437.5		5/28	1440.8		6/28	1439.1
4/29	1437.4		5/29	1441.2		6/29	1438.8
4/30	1437.2		5/30	1441.3		6/30	1438.6
			5/31	1441.4			

APPENDIX B

Process Flow Compliance Requirements Table

*Current 10-year cycle defined as July 2023 to June 2033.

Process Flow Component	Magnitude and Duration	*Frequency	Criteria Met?
Component 1: Channel Maintenance Flow (CM) (measured at USGS Streamflow Gage No. 12138160)	Component Flow achieved when: (a) a target flow of at least 4100 cfs is maintained for twenty-four (24) hours; or (b) a target flow of at least 4100 cfs is achieved and the Licensee provides a maximum release flow at the time when flow drops below 4100 cfs for a total duration (including the target flow and maximum release) of twenty-four (24) consecutive hours.	Four (4) times every ten (10) years (but not less than once every four (4) years).	Not in the current 10-year cycle. Last qualifying event was on 11/15/2021.
Component 2: Channel Forming (CF) (measured at USGS Streamflow Gage No. 12138160)	Component flow is achieved when: (a) a target flow of at least 6500 cfs is maintained for twenty-four (24) consecutive hours; or (b) a target flow of 6500 cfs is achieved and the Licensee provides a maximum release flow at the time when flow drops below 6500 cfs for a total duration (including the target flow and maximum release) of twenty-four (24) consecutive hours, or (c) the Licensee provides a maximum release flow for twenty-four (24) consecutive hours that is timed to achieve, to the extent feasible, a target flow of 6500 cfs.	One (1) time every ten (10) years.	Not in the current 10-year cycle. Last qualifying event was on 2/1/2020.

Process Flow Component	Magnitude and Duration	*Frequency	Criteria Met?
Component 3.1: Reach 1 Flushing Flows (F) (measured at USGS Streamflow Gage No. 12138160)	Component flow in this reach is achieved when a minimum of 1,500 cfs is maintained for six (6) consecutive hours. In the event that the elevation of Spada Reservoir is below 1,420 feet msl at the time of a scheduled flushing flow, a flushing flow will be achieved when a minimum of 1,200 cfs is maintained for six (6) consecutive hours.	If the spring flushing flow is not provided naturally within the 4 weeks preceding April 15, Snohomish PUD will conduct an intentional release during last 2 weeks of April. One (1) of the annual flushing flows shall occur between August 1 and September 15.	Yes, for WY24-25.
Component 3.2: Reach 2 Flushing (F) Flows(measured immediately upstream of Powerhouse at RM 4.7)	Component flow achieved when: (a) a 500 cfs instantaneous minimum flow is maintained for six (6) consecutive hours; or (b) a 700 cfs instantaneous minimum flow is maintained for three (3) consecutive hours.	If the spring flushing flow is not provided naturally within the 4 weeks preceding April 15, Snohomish PUD will conduct an intentional release during last 2 weeks of April. One (1) of the annual flushing flows shall occur between August 1 and September 15.	Yes, for WY24-25.
Component 3.3: Reach 3 Flushing Flows (F) (measured immediately upstream of City of Everett's Diversion Dam at RM 9.8)	Component flow achieved when: (a) a 400 cfs instantaneous minimum flow is maintained for six (6) consecutive hours; or (b) a 600 cfs instantaneous minimum flow is maintained for three (3) consecutive hours.	If the spring flushing flow is not provided naturally within the 4 weeks preceding April 15, Snohomish PUD will conduct an intentional release during last 2 weeks of April. One (1) of the annual flushing flows shall occur between August 1 and September 15.	Yes, for WY24-25.
Component 4.1: Reach 1 Upstream Migration Flow (U)	Component flow achieved when a minimum flow between 800 and 1200 cfs as determined	If not provided naturally during September, Snohomish PUD will	Yes, for WY24-25.

Process Flow Component	Magnitude and Duration	*Frequency	Criteria Met?
(measured at USGS Streamflow Gage No. 12138160)	by the Aquatic Resource Committee (ARC) is maintained or exceeded for six (6) consecutive hours.	conduct an intentional release during the first 2 weeks of October.	
Component 4.2: Reach 2 Upstream Migration Flow (U) (measured immediately upstream of the Powerhouse at RM 4.7)	Component flow is achieved when a flow between 400 and 600 cfs instantaneous minimum flow, as determined by the ARC, is maintained for six (6) consecutive hours.	If not provided naturally during September, Snohomish PUD will conduct an intentional release during the first 2 weeks of October.	Yes, for WY24-25.
Component 4.3: Reach 3 Upstream Migration Flow (U) (measured immediately upstream of the City of Everett's Diversion Dam at RM 9.8)	Component flow achieved when a minimum flow between 300 and 500 cfs as determined by the ARC is maintained or exceeded for six (6) consecutive hours.	If not provided naturally during September, Snohomish PUD will conduct an intentional release during the first 2 weeks of October.	Yes, for WY24-25.
Component 5.1: Reach 1 Outmigration Flow (O) (measured at USGS Streamflow Gage No. 12138160)	Component flow is achieved when between 800 and 1200 cfs minimum flow as determined by the ARC is maintained or exceeded for six (6) consecutive hours.	Two (2) times per year, both at nighttime. One (1) of the annual outmigration flows to occur in March and one (1) to occur in April, with a minimum of seven days separation between events. If the March event does not manifest through accretion, then both events will occur in April, one (1) in early April and one (1) in late April separated by two (2) weeks.	Yes, for WY24-25.
Component 5.2: Reach 2 Outmigration Flow (O) (measured immediately	Component flow is achieved when between 400 and 600 cfs minimum flow as determined by	Two (2) times per year, both at nighttime. One (1) of the annual outmigration flows to occur in March and one (1) to occur in April, with a	Yes, for WY24-25.

Process Flow Component	Magnitude and Duration	*Frequency	Criteria Met?
upstream of the Powerhouse at RM 4.7)	the ARC is maintained or exceeded for six (6) consecutive hours.	minimum of seven days separation between events. If the March event does not manifest through accretion, then both events will occur in April, one (1) in early April and one (1) in late April separated by two (2) weeks.	
Component 5.3: Reach 3 Outmigration Flow (O) (measured immediately upstream of the City of Everett's Diversion Dam at RM 9.8)	Component flow is achieved when between 200 and 400 cfs minimum flow as determined by the ARC is maintained or exceeded for six (6) consecutive hours.	Two (2) times per year, both at nighttime. One (1) of the annual outmigration flows to occur in March and one (1) to occur in April, with a minimum of seven days separation between events. If the March event does not manifest through accretion, then both events will occur in April, one (1) in early April and one (1) in late April separated by two (2) weeks.	Yes, for WY24-25.

APPENDIX C

Consultation Documentation Regarding Draft Report

From:	Presler, Dawn
To:	Anne Savery; Anna Thelen; Anne Baxter; Applegate, Brock A (DFW); Jeff Garnett; Kathleen Wells; Mike Rustay; Nate Morgan; Pete Verhey; Richard Vacirca; Scott Bohling; Tom O"Keefe
Cc:	Nobles, Matthew; Legare, Kyle; McDonnell, Andrew
Subject:	Jackson Hydro (FERC No. 2157) - draft OCMP 24-25 annual rpt for 30d review by October 6
Date:	Friday, September 5, 2025 8:27:00 AM
Attachments:	image001.png 202509 DRAFT OCMP 24-25 Annual Rpt for ARC 30d review.pdf

---

Dear ARC,

Attached is the Operation Compliance Monitoring Plan (OCMP) DRAFT 2024-2025 Annual Report for the Jackson Hydroelectric Project, for a 30-day review and comment period. If you have any comments on the attached, please email them to me (and cc: Kyle Legare) by Monday October 6, 2025. Emails stating you concur with or have no comment regarding the report are appreciated too!

Enjoy the weekend.

Cheers,

Dawn Presler, MSIM MSSM *(she/her)*
Lead – Environmental & Licensing Compliance
Natural Resources, Generation | Snohomish PUD

O: 425-783-1709 | **C:** 425-725-0745
2320 California Street, Everett WA 98201
www.snopud.com

From:	Bohling, Scott (ECY)
To:	Presler, Dawn
Cc:	Legare, Kyle
Subject:	[External Sender] RE: Jackson Hydro (FERC No. 2157) - draft OCMP 24-25 annual rpt for 30d review by October 6
Date:	Monday, October 6, 2025 2:56:05 PM
Attachments:	image001.png 202509 DRAFT OCMP 24-25 Annual Rpt for ARC 30d review_ECY_SBcomments.pdf 20251002_SNOPUD_Jackson_OCMP_Report.pdf

Dawn and Kyle,

Please see the attached letter and copy of the OCMP report for comments. I only have a few brief comments, which are primarily aimed at making the report easier to understand in the context of the larger settlement agreement and/or 401 requirements.

If you would like to meet to discuss my comments, please let me know and I will work to find a time that works for us to meet.

Thank you,

-Scott

Scott Bohling
Hydropower Project Manager
Department of Ecology, NWRO
PO Box 330316
Shoreline, WA 98133-9716

24-hour reception line: 206-594-0000

From: Presler, Dawn <DJPresler@SNOPUD.com>
Sent: Friday, September 5, 2025 8:27 AM
To: Anne Savery <asavery@tulaliptribes-nsn.gov>; Anna Thelen <AThelen@everettwa.gov>; Baxter, Anne (ECY) <abax461@ECY.WA.GOV>; Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.gov>; Jeff Garnett <Jeffrey_Garnett@fws.gov>; Kathleen Wells <kathleen.wells@noaa.gov>; Mike Rustay <mike.rustay@co.snohomish.wa.us>; Nate Morgan <nate.morgan@ci.sultan.wa.us>; Verhey, Peter A (DFW) <Peter.Verhey@dfw.wa.gov>; Richard Vacirca <richard.vacirca@usda.gov>; Bohling, Scott

(ECY) <sboh461@ECY.WA.GOV>; okeefe <okeefe@americanwhitewater.org>
Cc: Nobles, Matthew <MDNobles@SNOPUD.com>; Legare, Kyle <KJLegare@Snopud.com>; McDonnell, Andrew <AWMcdonnell@SNOPUD.com>
Subject: Jackson Hydro (FERC No. 2157) - draft OCMP 24-25 annual rpt for 30d review by October 6

External Email

Dear ARC,
Attached is the Operation Compliance Monitoring Plan (OCMP) DRAFT 2024-2025 Annual Report for the Jackson Hydroelectric Project, for a 30-day review and comment period. If you have any comments on the attached, please email them to me (and cc: Kyle Legare) by Monday October 6, 2025. Emails stating you concur with or have no comment regarding the report are appreciated too!

Enjoy the weekend.

Cheers,
Dawn Presler, MSIM MSSM *(she/her)*
Lead – Environmental & Licensing Compliance
Natural Resources, Generation | Snohomish PUD

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SNOHOMISH PUD | *Energizing Life in Our Communities*

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

VIA ELECTRONIC FILING

October 1, 2025

Dawn Presler
Natural Resources, Generation
Snohomish Public Utilities District
2320 California Street, Everett WA 98201

RE: Department of Ecology comments on the Operation Compliance Monitoring Plan Draft Annual Report for Water Year July 2024-June 2025 (License Article 407) for the Henry M. Jackson Hydroelectric Project, FERC No. 2157.

Mrs. Presler,

Please find enclosed the Washington State Department of Ecology's (Ecology) comments on the Operation Compliance Monitoring Plan (OCMP) Draft Annual Report for Water Year July 2024-June 2025 (License Article 407) submitted by the Snohomish Public Utilities District (PUD) in September 2025. Ecology has resource management responsibilities related to the operation and management of hydropower facilities in Washington and provides these comments under the authorities vested in the State of Washington to implement Section 401 of the Federal Clean Water Act (33 USC § 1341). Ecology has reviewed the draft OCMP report and respectfully submits this summary letter and associated comments for consideration by the PUD.

Thank you for the opportunity to review and comment on the OCMP Draft Annual Report. Ecology recognizes the significant level of work, data collection, and information that is summarized in the draft report. Ecology will also note that the reporting requirements are met as described in section 1.0 (Introduction), on page 1, which states the following:

"Per Section 9 of the OCMP, Snohomish PUD 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;"

While the draft is well written, Ecology does provide comments in the draft of the OCMP which was sent accompanying this letter. The following comments and requested modifications are intended to provide context and clarity to the report for current and future reviewers of this information.

To summarize the intent of the comments, it is difficult to understand how the information presented in the draft OCMP corresponds to the requirements within the settlement agreement and/or the 401 water quality certification. The difficulty in conveying the information is likely due to the process flow requirements described in the settlement articles (A-LA-08, Table 1, PDF page 116) are three pages long, and include information about flow volume, duration, and frequency over the life of the license.

The simplest solution may be to include Table 1 from A-LA-08 in the document, so it is easier to cross reference and verify that the flows are meeting the settlement agreement requirements. Other options, such as expanding Table 1 presented in the draft OCMP are included as comments.

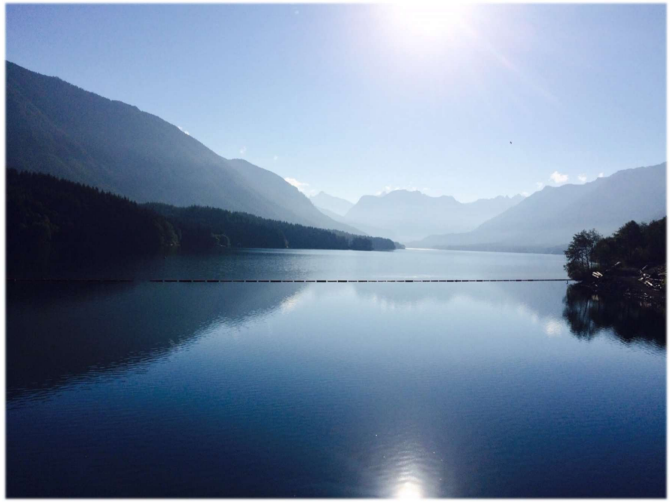
Again, thank you for the opportunity to review and comment on the Operation Compliance Monitoring Plan Draft Annual Report. These reports, analyses, and included data sets are important to demonstrate ongoing compliance with water quality standards and the Section 401 Water Quality Certification.

Sincerely,

Scott Bohling

Scott Bohling
Hydroelectric Projects Manager
Department of Ecology, Northwest Regional Office

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



Operation Compliance Monitoring Plan
Draft Annual Report for
Water Year July 2024 – June 2025
(License Article 407)

Prepared By:

Everett, WA

September 2025

Summary of Comments on Microsoft Word - OCMP Annual Report WY 24-25.docx

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DRAFT – This document has been prepared by Snohomish PUD based on information known at the time of its preparation and with that understanding is considered complete. The document may be cited as:

Public Utility District No. 1 of Snohomish County (Snohomish PUD). 2025. Operation Compliance Monitoring Plan Draft Annual Report for Water Year July 2024 through June 2025 (License Article 407) for the Henry M. Jackson Hydroelectric Project, FERC No. 2157. September 2025.

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This page contains no comments

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APPENDICES

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LIST OF TABLES

ACRONYMS AND ABBREVIATIONS

A-LA	Aquatic License Article
ARC	Aquatic Resource Committee
cfs	cubic feet per second
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
RM	River Mile
SCADA	Supervisory Control and Data Acquisition
Snohomish PUD	Public Utility District No. 1 of Snohomish County
USGS	United States Geological Survey
WY	Water year

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Author: sboh461 Subject: Comment on Text Date: 9/5/2025 1:31:27 PM
The process flows as described in the settlement articles (A-LA-08, Table 1, PDF page 116) are complex. Understanding that the table is three pages long, it may be helpful to include the table either in the text or as an attachment, so other interested parties can review the agreement when comparing to table 1 below.

1.0 INTRODUCTION

Public Utility District No. 1 of Snohomish County (Snohomish PUD) 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. Snohomish PUD 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, Snohomish PUD 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 2024 – June 2025.

A copy of the draft report is being provided to the 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 30-day review and comment period.

Spada Lake Reservoir data in tabular format are included in Appendix A. Consultation documentation with the ARC regarding the draft report is included in Appendix B.

2.0 PROCESS FLOWS

Snohomish PUD provided process flow events pursuant to the updated Process Flow Plan (PF Plan) on six occasions during the July 2024 – June 2025 timeframe to provide both biological and habitat benefits in each of the three reaches of the Sultan River (Figure 1). These included, in chronological order:

1) a flushing of surficial fine sediment from the streambed in August 2024,
2) an upmigration flow for spawning salmonids in September 2024
3) a nighttime outmigration flow (Reach 2 and 3) in March 2025,
4) a nighttime outmigration flow (Reach 1) coupled with a sediment flushing flow in March 2025,
5) a nighttime outmigration flow (Reach 2 and 3) coupled with a sediment flushing flow in April 2025, and

Page: 6

Author: sboh461 Subject: Sticky Note Date: 9/5/2025 2:57:04 PM

6) a nighttime outmigration flow (Reach 1) in April 2025.

The process flow events for the July 2024 – June 2025 timeframe are summarized, by these reaches, in Table 1. Snohomish PUD 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 14. The full Process Flow Log (dating back to License issuance in September 2011) is posted to the web at: https://www.snopud.com/community-environment/environmental-commitment/stewardship/jackson-fish-program/fish-mgmt-plans/

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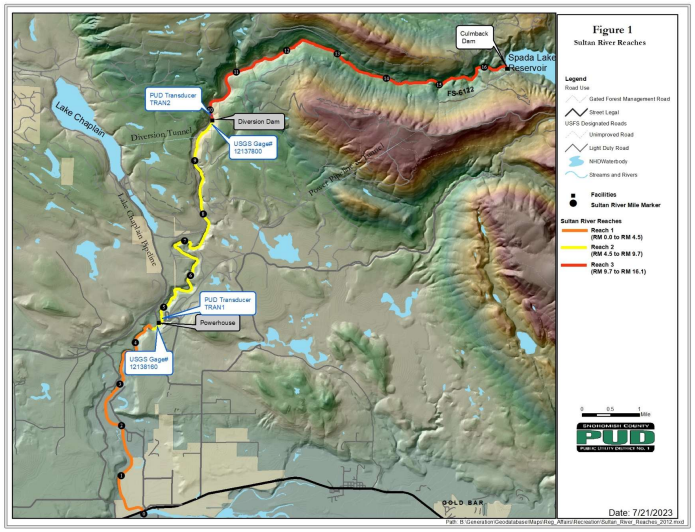

Figure 1. Sultan River reaches.

Table 1. Process Flow Log, July 2024 – June 2025.

Date[1]	Time[2]	Magnitude[3] (cfs)	Duration[4] (hrs)	Accretion[5] (cfs)	Notes[6]	Counts as PE Type[7]
8/17/2024	10:30-16:30	R3 – 671 (average) 621 to 721 cfs	6 hours greater than 600 cfs	Estimated at 10 cfs	Reference Figure 2	F
8/17/2024	12:15-18:15	R2 – 798 (average) 716 to 853 cfs	6 hours greater than 700 cfs	Estimated at 15 cfs	Reference Figure 3	F
8/17-18/2024	12:00-01:30	R1 – 1,669 cfs (average) 1,520 to 1,810 cfs	13.5 hours greater than 1,500 cfs	Estimated at 25 cfs	Reference Figure 4	F
9/7–8/2024	09:30-15:00	R3 – 509 (average) 317-728	18 hours greater than 300 cfs	Estimated at 8 cfs	Reference Figure 5	U
9/7–8/2024	12:30-15:00	R2 – 631 (average) 413 to 762 cfs	26.5 hours greater than 400 cfs	Estimated at 13 cfs	Reference Figure 6	U
9/7/2024	12:00-18:00	R1 – 844 (average) 805 to 858 cfs	6 hours greater than 800 cfs	Estimated at 13 cfs	Reference Figure 7	
3/21-22/2025	18:00-00:00	R3 – 479 (average), Range 456 to 492 cfs	30 hours greater than 200 cfs	Estimated at 65 cfs	Reference Figure 8	O
3/21-22/2025	20:00-06:00	R2 – 723 (average), Range 678 to 744 cfs	10 hours greater than 400 cfs	Estimated at 70 cfs	Reference Figure 9	O
3/23-25/2025	12:00-19:00	R1 – 1,837 (average) Range 1,500 – 2,236 cfs	55 hours greater than 1,500 cfs	Estimated at 70 cfs	Reference Figure 10	F, O
4/1-4/2025	00:00-06:00	R2 – 731 (average), Range 666 – 781 cfs	78 hours greater than 600 cfs	Estimated at 31 cfs	Reference Figure 11	F, O
4/1-9/2025	00:00-00:00	R3 – 462 (average) Range 402-512 cfs	216 hours greater than 400 cfs	Estimated at 22 cfs	Reference Figure 12	F,O
4/17-18/2025	20:00-4:00	R1 – 829 (average), Range 818 to 844 cfs	8 hours with flows greater than 800 cfs	Estimated at 70 cfs	Reference Figure 13	O

[1] Start Date of Event (MM/DD/YYYY)
[2] Start Time-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, Released or Natural
[7] Channel Forming (CF), Channel Maintenance (CM), Flushing (F), Outmigration (O), Upmigration (U)

Page: 8

Author: sboh461 Subject: Comment on Text Date: 9/5/2025 2:41:20 PM
Is it possible to include a column that includes frequency requirements, number of flows, and if you have met or exceeded the requirements?

Author: sboh461 Subject: Comment on Text Date: 9/5/2025 2:56:54 PM
Thank you for including the reach abbreviation in this column. The flow measuring points change depending on the reach. IE - R2 is immediately upstream at RM 4.7, while R1 is at the USGS gage 12138160. The monitoring location is included in the charts below which is helpful. It may be useful to include a description of the monitoring locations above this table, as some reviewers may be confused as to the different locations described in the charts.

Author: sboh461 Subject: Comment on Text Date: 9/5/2025 2:39:27 PM
This one is interesting. It started out and ended above the minimum at 300 CFS? Are these flows tied to a natural event?

Author: sboh461 Subject: Sticky Note Date: 9/5/2025 2:39:43 PM
As an upmigration flow, are there any upper limits, or higher flow volumes that would be considered a (velocity) barrier in any constricted portions of the river?

Author: sboh461 Subject: Comment on Text Date: 9/5/2025 1:44:05 PM
Anne - Do you think this should be defined or included before the table?

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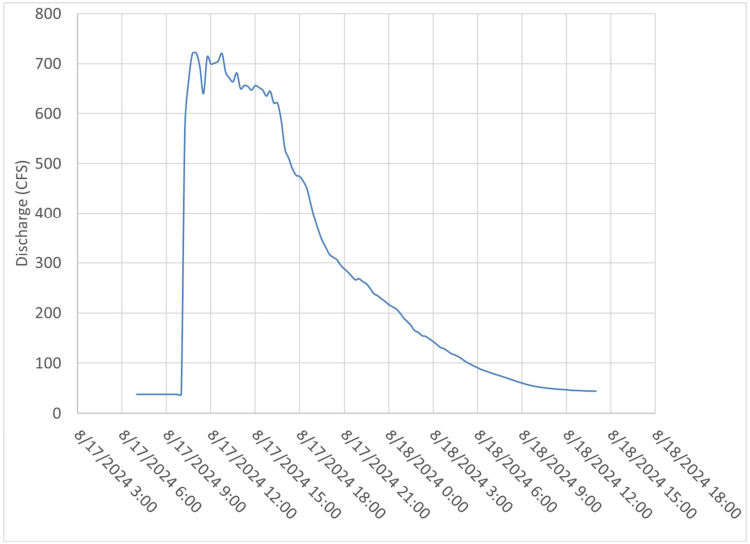

Figure 2. Sultan River immediately upstream of Diversion Dam – 8/17–18/2024.

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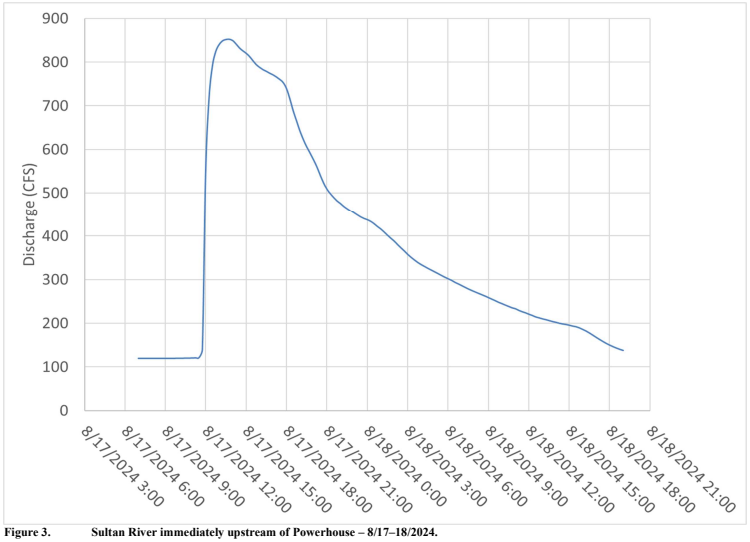

Figure 3. Sultan River immediately upstream of Powerhouse – 8/17–18/2024.

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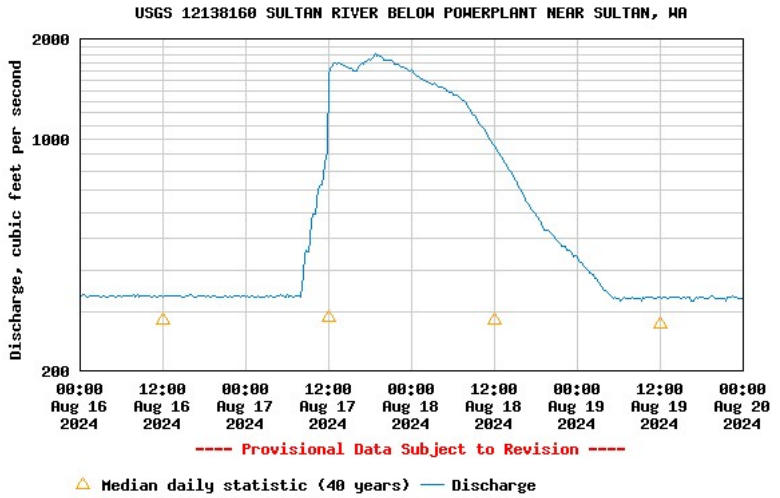

Figure 4. **Sultan River immediately downstream of Powerhouse – 8/17–18/2024.**

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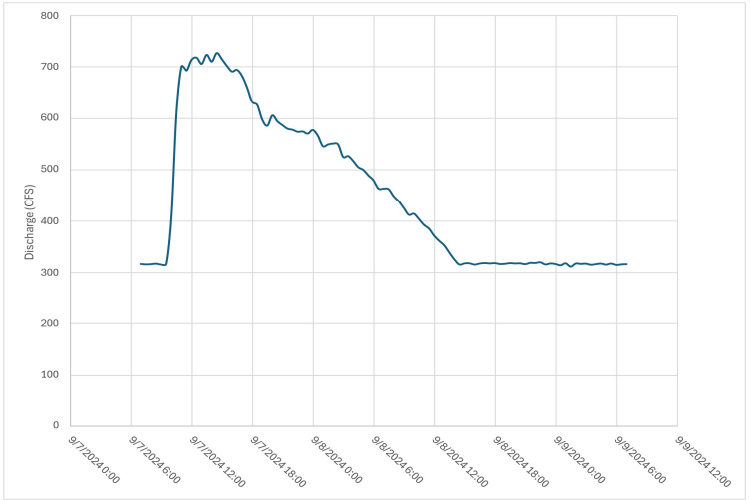

Figure 5. Sultan River immediately upstream of Diversion Dam – 9/7–8/2024.

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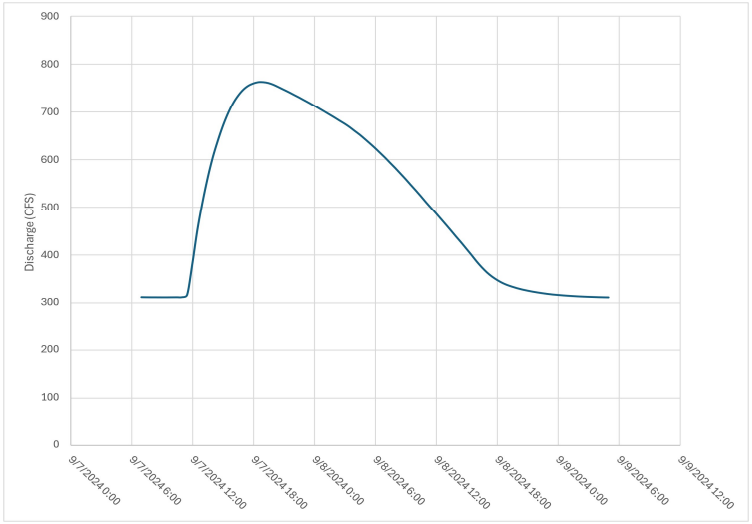

Figure 6. Sultan River immediately upstream of Powerhouse – 9/7–9/2024.

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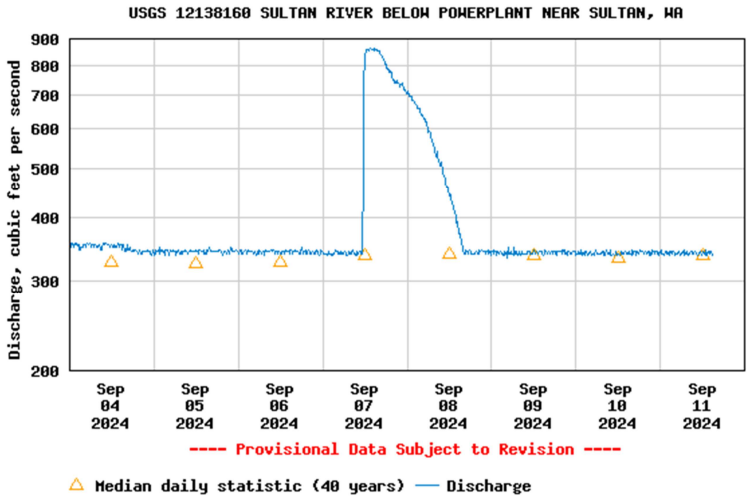

Figure 7. **Sultan River immediately downstream of Powerhouse – 9/7/2024.**

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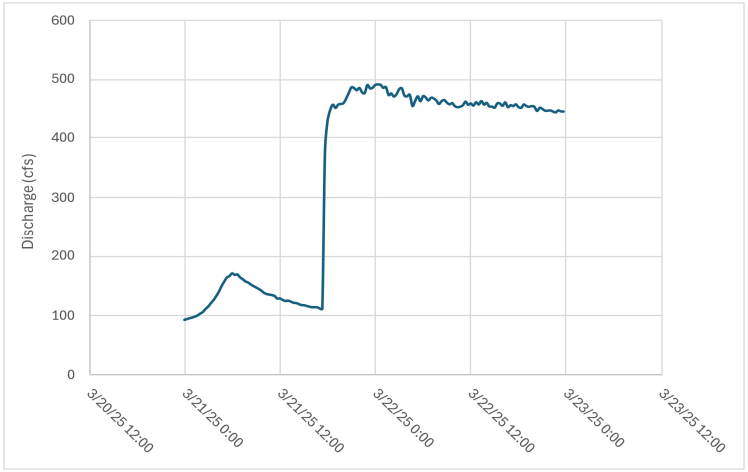

Figure 8. Sultan River immediately upstream of Diversion Dam – 3/21–22/2025.

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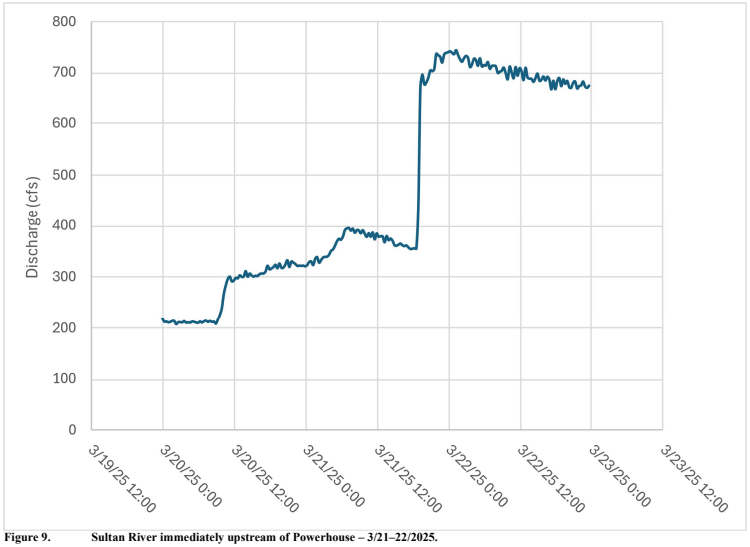

Figure 9. **Sultan River immediately upstream of Powerhouse – 3/21–22/2025.**

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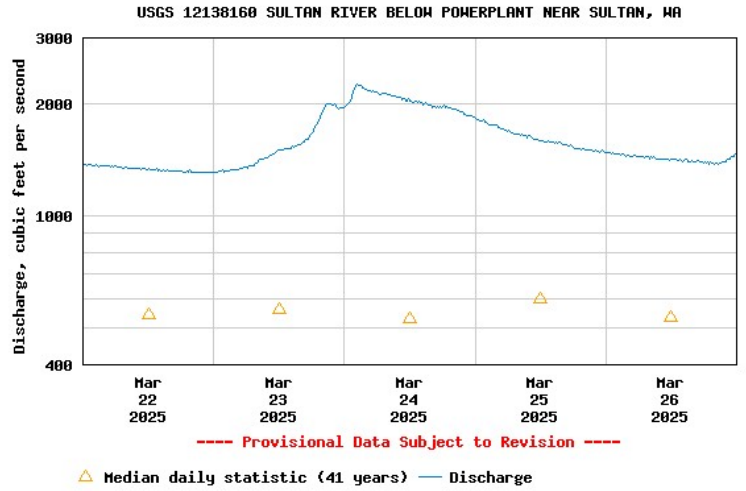

Figure 10. **Sultan River immediately downstream of Powerhouse flow – 3/23–25/2025.**

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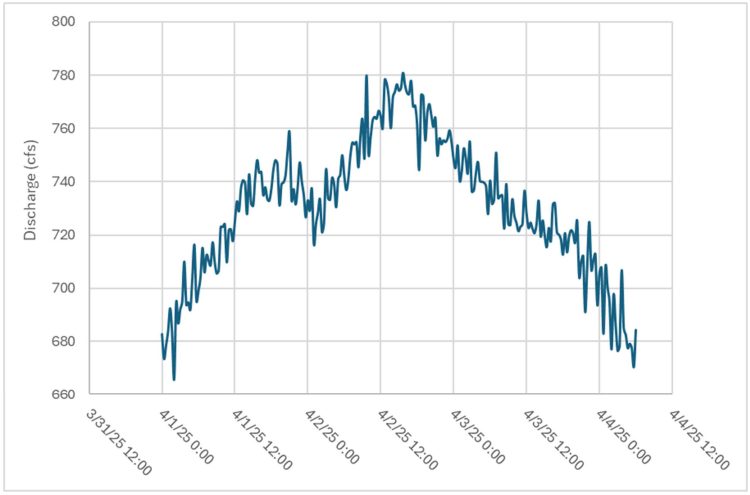

Figure 11. Sultan River immediately Upstream of Powerhouse Flow – 4/1–4/2025.

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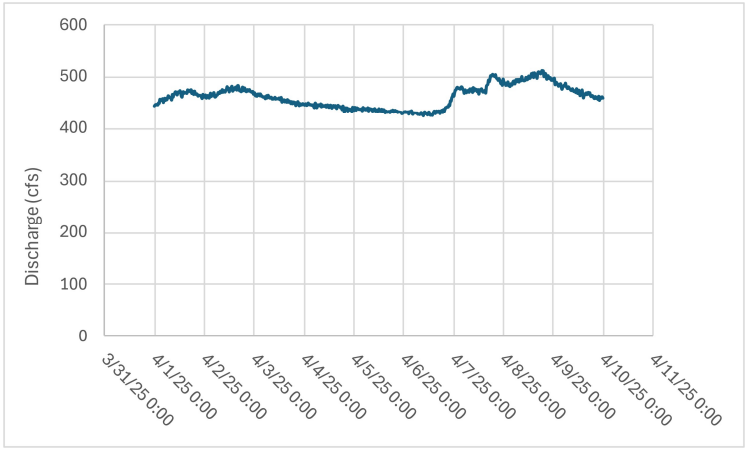

Figure 12. Sultan River immediately Upstream of Diversion Dam Flow – 4/1 – 9/2025.

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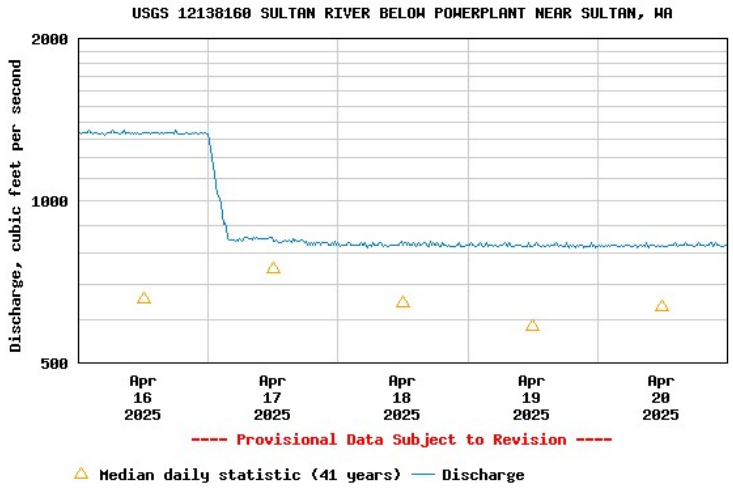

Figure 13. **Sultan River immediately Downstream of Powerhouse Flow – 4/17–18/2025.**

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3.0 SPADA LAKE RESERVOIR WATER SURFACE ELEVATIONS

During this reporting period, Spada Lake Reservoir daily water surface elevations ranged between 1,413.4 and 1,449.6 feet msl, with the low on October 15, 2024, and the high on July 2, 2024. Figure 14 displays the daily water surface elevations of Spada Lake Reservoir, and Appendix A contains the data in tabular format.

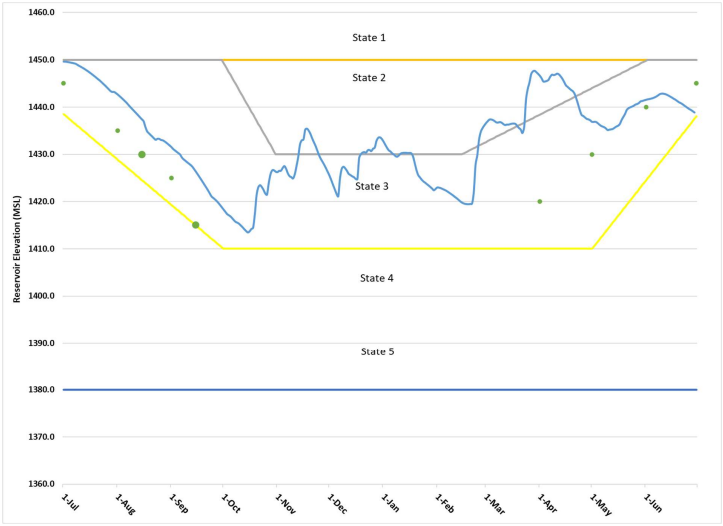

Figure 14. Water surface elevation, Spada Lake Reservoir, July 1, 2024 – June 30, 2025.

4.0 DEVIATIONS FROM STATE 3

License Article 406 requires:

> *When Spada Lake is in State 3, subject to meeting the City of Everett's water supply requirements and the 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... After the temperature conditioning structure is installed and operational, the licensee shall*

maintain a minimum impoundment water surface elevation in Spada Lake above 1,415 feet msl from August 16 through September 15.[8]

During August 16 – September 15, 2024, the water surface in Spada Lake Reservoir did not go below the target elevation of 1,415 feet msl.

[8] *Public Utility District No. 1 of Snohomish County,* 137 FERC ¶ 61,221 (2011), Order Denying Rehearing and Granting Clarification, issued December 15, 2011.
[9] Given fluctuations of the reservoir and corresponding oscillations around the target elevation, the Snohomish PUD rounds to the nearest mean daily elevation.

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APPENDIX A

Spada Lake Reservoir Daily Elevations Tabular Format

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Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)
7/1	1449.6	8/1	1442.6	9/1	1431.5
7/2	1449.6	8/2	1442.3	9/2	1431.1
7/3	1449.5	8/3	1442.0	9/3	1430.8
7/4	1449.4	8/4	1441.7	9/4	1430.5
7/5	1449.4	8/5	1441.3	9/5	1430.2
7/6	1449.3	8/6	1440.9	9/6	1429.9
7/7	1449.2	8/7	1440.5	9/7	1429.3
7/8	1449.1	8/8	1440.1	9/8	1428.9
7/9	1448.9	8/9	1439.7	9/9	1428.6
7/10	1448.7	8/10	1439.3	9/10	1428.3
7/11	1448.5	8/11	1438.9	9/11	1428.0
7/12	1448.2	8/12	1438.6	9/12	1427.7
7/13	1448.0	8/13	1438.2	9/13	1427.4
7/14	1447.8	8/14	1437.8	9/14	1426.9
7/15	1447.5	8/15	1437.4	9/15	1426.3
7/16	1447.3	8/16	1437.0	9/16	1425.8
7/17	1447.0	8/17	1435.8	9/17	1425.2
7/18	1446.7	8/18	1434.8	9/18	1424.7
7/19	1446.4	8/19	1434.4	9/19	1424.1
7/20	1446.1	8/20	1434.1	9/20	1423.5
7/21	1445.8	8/21	1433.7	9/21	1423.0
7/22	1445.5	8/22	1433.3	9/22	1422.4
7/23	1445.1	8/23	1433.0	9/23	1421.7
7/24	1444.8	8/24	1433.3	9/24	1421.1
7/25	1444.5	8/25	1433.2	9/25	1420.8
7/26	1444.1	8/26	1433.0	9/26	1420.4
7/27	1443.7	8/27	1432.9	9/27	1420.1
7/28	1443.3	8/28	1432.7	9/28	1419.7
7/29	1443.2	8/29	1432.4	9/29	1419.2
7/30	1443.2	8/30	1432.1	9/30	1418.8
7/31	1442.9	8/31	1431.8		

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Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)	Date	Reservoir Elevation (feet)
10/1	1418.3	11/1	1426.2	12/1	1425.4
10/2	1417.8	11/2	1426.5	12/2	1424.5
10/3	1417.3	11/3	1426.5	12/3	1423.5
10/4	1417.1	11/4	1427.1	12/4	1422.5
10/5	1416.8	11/5	1427.5	12/5	1421.6
10/6	1416.4	11/6	1426.9	12/6	1421.1
10/7	1416.0	11/7	1425.9	12/7	1424.9
10/8	1415.7	11/8	1425.3	12/8	1426.9
10/9	1415.5	11/9	1425.1	12/9	1427.3
10/10	1415.2	11/10	1424.9	12/10	1427.0
10/11	1414.9	11/11	1425.8	12/11	1426.5
10/12	1414.5	11/12	1427.5	12/12	1425.8
10/13	1414.1	11/13	1429.5	12/13	1425.6
10/14	1413.7	11/14	1432.1	12/14	1425.3
10/15	1413.4	11/15	1432.9	12/15	1425.1
10/16	1413.7	11/16	1433.1	12/16	1424.8
10/17	1414.2	11/17	1435.2	12/17	1424.7
10/18	1414.4	11/18	1435.4	12/18	1429.2
10/19	1417.3	11/19	1435.0	12/19	1430.0
10/20	1421.3	11/20	1434.3	12/20	1430.3
10/21	1423.0	11/21	1433.3	12/21	1430.4
10/22	1423.4	11/22	1432.5	12/22	1430.3
10/23	1423.1	11/23	1431.7	12/23	1430.8
10/24	1422.4	11/24	1430.7	12/24	1430.9
10/25	1421.7	11/25	1429.7	12/25	1430.6
10/26	1421.4	11/26	1429.0	12/26	1431.1
10/27	1423.9	11/27	1428.3	12/27	1431.4
10/28	1425.7	11/28	1427.7	12/28	1432.8
10/29	1426.6	11/29	1427.0	12/29	1433.5
10/30	1426.6	11/30	1426.2	12/30	1433.6
10/31	1426.3			12/31	1433.2

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Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
1/1	1432.7		2/1	1422.9		3/1	1436.6
1/2	1432.0		2/2	1422.9		3/2	1437.0
1/3	1431.4		2/3	1422.8		3/3	1437.3
1/4	1430.8		2/4	1422.6		3/4	1437.3
1/5	1430.6		2/5	1422.5		3/5	1437.2
1/6	1430.2		2/6	1422.3		3/6	1437.0
1/7	1429.9		2/7	1422.1		3/7	1436.7
1/8	1429.6		2/8	1421.8		3/8	1436.7
1/9	1429.5		2/9	1421.5		3/9	1436.8
1/10	1429.8		2/10	1421.3		3/10	1436.7
1/11	1430.1		2/11	1421.0		3/11	1436.4
1/12	1430.3		2/12	1420.7		3/12	1436.2
1/13	1430.3		2/13	1420.4		3/13	1436.3
1/14	1430.3		2/14	1420.1		3/14	1436.3
1/15	1430.2		2/15	1419.8		3/15	1436.4
1/16	1430.2		2/16	1419.6		3/16	1436.5
1/17	1430.2		2/17	1419.5		3/17	1436.5
1/18	1429.5		2/18	1419.4		3/18	1436.4
1/19	1428.1		2/19	1419.4		3/19	1436.0
1/20	1426.6		2/20	1419.5		3/20	1435.5
1/21	1425.6		2/21	1419.5		3/21	1435.2
1/22	1425.1		2/22	1422.0		3/22	1434.5
1/23	1424.6		2/23	1427.7		3/23	1435.8
1/24	1424.2		2/24	1429.7		3/24	1441.3
1/25	1424.0		2/25	1433.0		3/25	1443.7
1/26	1423.7		2/26	1434.7		3/26	1445.1
1/27	1423.4		2/27	1435.5		3/27	1446.9
1/28	1423.1		2/28	1436.1		3/28	1447.5
1/29	1422.7					3/29	1447.6
1/30	1422.4					3/30	1447.3
1/31	1422.6					3/31	1447.0

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Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
4/1	1446.6		5/1	1436.8		6/1	1441.5
4/2	1446.0		5/2	1436.8		6/2	1441.6
4/3	1445.4		5/3	1436.8		6/3	1441.7
4/4	1445.4		5/4	1436.7		6/4	1441.7
4/5	1445.5		5/5	1436.3		6/5	1441.8
4/6	1445.7		5/6	1436.0		6/6	1442.0
4/7	1446.4		5/7	1435.9		6/7	1442.2
4/8	1446.8		5/8	1435.7		6/8	1442.4
4/9	1446.7		5/9	1435.4		6/9	1442.7
4/10	1446.8		5/10	1435.1		6/10	1442.8
4/11	1447.0		5/11	1435.2		6/11	1442.8
4/12	1446.9		5/12	1435.2		6/12	1442.7
4/13	1446.4		5/13	1435.3		6/13	1442.6
4/14	1445.9		5/14	1435.6		6/14	1442.4
4/15	1445.3		5/15	1435.8		6/15	1442.2
4/16	1444.6		5/16	1436.0		6/16	1442.0
4/17	1444.2		5/17	1436.4		6/17	1441.7
4/18	1443.9		5/18	1437.2		6/18	1441.5
4/19	1443.6		5/19	1437.8		6/19	1441.3
4/20	1443.3		5/20	1438.5		6/20	1441.0
4/21	1442.8		5/21	1439.3		6/21	1440.8
4/22	1441.7		5/22	1439.7		6/22	1440.6
4/23	1440.6		5/23	1439.9		6/23	1440.3
4/24	1439.3		5/24	1440.0		6/24	1440.1
4/25	1438.3		5/25	1440.2		6/25	1439.8
4/26	1438.1		5/26	1440.5		6/26	1439.5
4/27	1437.8		5/27	1440.6		6/27	1439.3
4/28	1437.5		5/28	1440.8		6/28	1439.1
4/29	1437.4		5/29	1441.2		6/29	1438.8
4/30	1437.2		5/30	1441.3		6/30	1438.6
			5/31	1441.4			

APPENDIX B

Consultation Documentation Regarding Draft Report [Placeholder for final report]

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APPENDIX D

Response to Comments Regarding Draft Report

No.	Comment	Response
Scott Bohling, WA Department of Ecology, via email dated October 6, 2025		
1	Section 2.0. The process flows as described in the settlement articles (A-LA-08, Table 1, PDF page 116) are complex. Understanding that the table is three pages long, it may be helpful to include the table either in the text or as an attachment, so other interested parties can review the agreement when comparing to table 1 below.	The revised table from A-LA-08 that includes information from the updated 2023 Process Flow Plan has been added as Appendix B.
2	Table 1. Is it possible to include a column that includes frequency requirements, number of flows, and if you have met or exceeded the requirements?	Table 1 has been revised to include frequency and magnitude compliance requirements.
3	Table 1. Thank you for including the reach abbreviation in this column. The flow measuring points change depending on the reach. IE - R2 is immediately upstream at RM 4.7, while R1 is at the USGS gage 12138160. The monitoring location is included in the charts below which is helpful. It may be useful to include a description of the monitoring locations above this table, as some reviewers may be confused as to the different locations described in the charts.	A brief description of the three compliance locations has been added under Section 2.0.
4	Table 1. This one is interesting. It started out and ended above the minimum at 300 CFS? Are these flows tied to a natural event?	A planned maintenance shutdown was in effect during this event. All minimum instream flows were met from valve releases at Culmback Dam.
5	Table 1. As an upmigration flow, are there any upper limits, or higher flow volumes that would be considered a (velocity) barrier in any constricted portions of the river?	Based on previous hydroacoustic data (2018-2021) flows exceeding 300 cfs limit upstream migration through the Diversion Dam sluiceway. *(Snohomish PUD. 2022. Sonar Monitoring of Steelhead Trout and Chinook Salmon at the Sultan River Diversion Dam, 2018-2021.)*
6	Table 1 footnote. Do you think this should be defined or included before the table?	The various component flows are now defined in detail in Appendix B.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served via e-mail a copy of the foregoing filing upon each person of the Jackson Hydroelectric Project's Aquatic Resource Committee. Dated at Everett, WA, this October 29, 2025.

/s/ Dawn J. Presler

Dawn J. Presler
Lead – License & Environmental Compliance
Public Utility District No. 1 of Snohomish County
2320 California Street
PO Box 1107
Everett, WA 98206-1107
Telephone: (425) 783-1709
Cell: (425) 725-0745

From:	Presler, Dawn
To:	Jennifer Quan - NOAA Federal; Anna Thelen; Anne Baxter; Anne Savery; Applegate, Brock A (DFW); Jeff Garnett; Kathleen Wells; Legare, Kyle; McDonnell, Andrew; Mike Rustay; Nate Morgan; Nobles, Matthew; Pete Verhey; Richard Vacirca; Scott Bohling; Tom O"Keefe
Subject:	Jackson Hydro (FERC No. 2157) - cc: OCMP WY24-25 Final Rpt to FERC
Date:	Wednesday, October 29, 2025 1:44:00 PM
Attachments:	image001.png JHP OCMP WY24-25 Final Rpt to FERC.pdf

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Dear ARC Members,

Attached is your cc: of the final report I will be e-filing with FERC shortly regarding the Jackson Hydro Project. Scott Bohling's comments on the draft version are included as Appendix C; responses to his comments are in Appendix D. If anyone has questions regarding the attached, please do not hesitate to reach out to us.

Have a great day.

Cheers,

Dawn Presler, MSIM MSSM *(she/her)*
Lead – Environmental & Licensing Compliance
Natural Resources, Generation | Snohomish PUD

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