



Energizing Life in Our Communities

April 27, 2024

VIA ELECTRONIC FILING

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

**Re: Jackson Hydro Project, FERC No. 2157
Instream Flow Schedule for Reach 3 of the Sultan River - Water Year 2024-2025**

Dear Acting Secretary Reese:

With this letter, Public Utility District No. 1 of Snohomish County (Snohomish PUD) is transmitting the instream flow schedule for the Jackson Hydroelectric Project (Project) within Reach 3 (River Mile [RM] 9.7 to 16.1) of the Sultan River for the 2024-2025 Water Year (see Attachment 1). This instream flow schedule is consistent with the requirements identified under "A-LA 9: Minimum Flows" in Appendix G of the Project's License; however, this flow schedule reshapes the default flow schedule identified in A-LA 9. The instream flow schedule for Water Year 2024-2025 is slightly modified from the flow schedule for Water Year 2023-2024 to avoid flow changes on the weekends and minimize transitions. The Aquatic Resource Committee was provided with the draft schedule; no requests for changes were made (see Attachment 2).

The shaping of the annual 23,831-acre-foot water budget is largely for the benefit of anadromous species using Reach 3 of the Sultan River since completion of volitional fish passage at the City of Everett's Diversion Dam at RM 9.7. Specifically, the post-passage emphasis of flow management and budgeting focuses on meeting the physical habitat and water quality needs of fall (Chinook and coho salmon) and spring (steelhead trout) spawning populations.

Please contact me if you have questions regarding this filing.

Sincerely,

/s/ Keith Binkley

Keith Binkley
Manager, Natural Resources
(425) 783-1760
KMBinkley@snopud.com

Attachments: 1 – Instream Flow Schedule Reach 3; 2 – ARC Consultation

cc: Aquatic Resource Committee

ATTACHMENT 1:
Water Year 2024-2025
Instream Flow Schedule for Reach 3

Date	Flow
July 1*-15	20
July 16-31	25
August 1-15	25
August 16-31	25
September 1-2	25
September 3-16	65
September 17-30	82
October 1-15	63
October 16-31	51
November 1-15	25
November 16-30	25
December 1-15	25
December 16-30	25
December 31	32
January 1-15	32
January 16-30	32
January 31	20
February 1-14	20
February 15-28	20
March 1-13	20
March 14-31	30
April 1-15	35
April 16-30	35
May 1-15	35
May 16-30	30
May 31	25
June 1-15	25
June 16-30	25

* July 1 begins the water year.

ATTACHMENT 2:
Consultation Documentation

From: [McDonnell, Andrew](#)
To: [Applegate, Brock A \(DFW\)](#); [Anne Savery](#); ["Elizabeth Babcock - NOAA Federal"](#); [Bohling, Scott \(ECY\)](#); [Garnett, Jeffrey A](#); [Baxter, Anne \(ECY\)](#)
Subject: RE: [External Sender] FW: Jackson Hydro (P-2157) - draft Reach 3 flow schedule for WY24-25 for your 30-day review by April 15
Date: Thursday, March 14, 2024 4:11:00 PM
Attachments: [image002.png](#)
[image003.png](#)

Hi Brock,

Thanks for your email and good clarifying questions. Below I have provided the current flow schedule to compare with the proposed schedule Dawn sent. The total acre-feet released in either case is the same and based on the annual water budget of 23,831 acre-feet.

The primary difference, as Dawn described, is that changes to the minimum flow under the proposed schedule would occur on workdays, when the plant is staffed. The seasonal release volumes are identical in some of the same time-periods, but not across all time-periods.

For example, in the current schedule a minimum flow of 32 cfs is required through January 31, with a reduction to 20 cfs on February 1.

In the next Water Year, February 1, 2025 falls on a Saturday so I have recommended the minimum flow change to occur one day sooner, on Friday, January 31, 2025.

Happy to discuss more, if you have other questions.

Thanks,

Andrew

Andrew McDonnell
Regulatory Scientist III
Generation – Natural Resources
Snohomish PUD
425-308-7937

Timeframe (WY2023-24) Current Schedule	Release Flow (cfs)
July 1*-15	25

July 16-31	25
August 1-15	30
August 16-31	31
September 1-14	65
September 15-21	82
September 22-30	82
October 1-15	63
October 16-31	51
November 1-15	25
November 16-30	20
December 1-15	24
December 16-31	32
January 1-15	31
January 16-31	32
February 1-14	20
February 15-28	20
March 1-15	20
March 16-31	38
April 1-15	33
April 16-30	22
May 1-15	33
May 16-31	25
June 1-15	20
June 16-30	20

From: Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.gov>

Sent: Thursday, March 14, 2024 2:01 PM

To: McDonnell, Andrew <AWMcDonnell@SNOPUD.com>; Anne Savery <asavery@tulaliptribes-nsn.gov>; 'Elizabeth Babcock - NOAA Federal' <elizabeth.babcock@noaa.gov>; Bohling, Scott (ECY) <sboh461@ECY.WA.GOV>; Garnett, Jeffrey A <jeffrey_garnett@fws.gov>; Baxter, Anne (ECY) <abax461@ECY.WA.GOV>

Subject: [External Sender] FW: Jackson Hydro (P-2157) - draft Reach 3 flow schedule for WY24-25 for your 30-day review by April 15

CAUTION: THIS EMAIL IS FROM AN EXTERNAL SENDER.

Do not click on links or open attachments if the sender is unknown or the email is suspect.

Hi Andrew, If I understand this correctly, the new schedule will release the same amount and proportion of water during the same time frame. SnoPUD just divided up the flows among different date ranges. Did I get that right Andrew?

Thanks, Brock

From: Presler, Dawn <DJPresler@SNOPUD.com>

Sent: Thursday, March 14, 2024 11:04 AM

To: Anne Savery <asavery@tulaliptribes-nsn.gov>; Anna Thelen <AThelen@everettwa.gov>; Applegate, Brock A (DFW) <Brock.Applegate@dfw.wa.gov>; Elizabeth Babcock <elizabeth.babcock@noaa.gov>; Jeff Garnett <Jeffrey_Garnett@fws.gov>; jbailey <jbailey@everettwa.gov>; Mike Rustay <mike.rustay@co.snohomish.wa.us>; Nate Morgan <nate.morgan@ci.sultan.wa.us>; Richard Vacirca <richard.vacirca@usda.gov>; Bohling, Scott (ECY) <sboh461@ECY.WA.GOV>; Tom O'Keefe <okeefe@americanwhitewater.org>

Cc: McDonnell, Andrew <AWMcDonnell@SNOPUD.com>; Binkley, Keith <KMBinkley@SNOPUD.com>; Legare, Kyle <KJLegare@Snopud.com>; Baxter, Anne (ECY) <abax461@ECY.WA.GOV>

Subject: Jackson Hydro (P-2157) - draft Reach 3 flow schedule for WY24-25 for your 30-day review by April 15

External Email

Dear ARC,

Attached is the Jackson Hydro Project's Sultan River Reach 3 (area from Culmback Dam to the Diversion Dam) draft minimum instream flow schedule for Water Year 24-25 (July 1, 2024 through June 30, 2025). This schedule updates last year's schedule to move instream flow changes to weekdays (rather than any occurring on weekends) and adjusts the budget accordingly to minimize extra flow changes while still focusing on meeting the physical habitat and water quality needs of fall (Chinook and coho salmon) and spring (steelhead trout) spawning populations past the Diversion Dam. Please review and provide comments, if any, back by April 15. Emails noting concurrence are greatly appreciated too. If you have any questions regarding the draft schedule in the meanwhile, feel free to reach out to Andrew. It'll also be on the ARC's April 10 meeting agenda in case there are any last-minute questions. Thanks.

Date	Flow
July 1*-15	20
July 16-31	25
August 1-15	25
August 16-31	25
September 1-2	25
September 3-16	65
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February 15-28	20
March 1-13	20
March 14-31	30
April 1-15	35
April 16-30	35
May 1-15	35
May 16-30	30
May 31	25
June 1-15	25
June 16-30	25

* July 1 begins the water year.

Enjoy the next couple days of sunshine.

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



Note: Emails and attachments sent to and from the PUD are public records and may be subject to disclosure.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served via e-mail a copy of the foregoing filing upon each person on the Project's Aquatic Resource Committee in accordance with ordering paragraph K of the Project license issued by the Federal Energy Regulatory Commission on September 2, 2011.

/s/ Dawn J. Presler

Dawn J. Presler
Sr. Environmental Coordinator
Public Utility District No. 1 of
Snohomish County
2320 California Street
PO Box 1107
Everett, WA 98206-1107
Telephone: (425) 783-1709

Dated: April 27, 2024

Presler, Dawn

From: Presler, Dawn
Sent: Saturday, April 27, 2024 10:49 AM
To: Anne Savery; Anna Thelen (AThelen@everettwa.gov); Brock Applegate; Elizabeth Babcock; Jeff Garnett; Mike Rustay; Nate Morgan; Richard Vacirca; Scott Bohling; Tom O'Keefe
Cc: Andrew McDonnell; Keith Binkley; Legare, Kyle; Baxter, Anne (ECY)
Subject: JHP (FERC No. 2157) - cc: Reach 3 flows for Water Year 24-25 (July 1- June 30)
Attachments: 20240427 to FERC R3 flow schedule WY2024-25 Reach 3.pdf

Dear ARC Members:

Attached is your cc: of the letter I'll be e-filing with FERC shortly regarding the Jackson Hydro Project Reach 3 flows for the upcoming Water Year 24-25 (July 1 – June 30).

Cheers,

Dawn Presler, MSIM MSSM (*she/her*)

Lead – Environmental & Licensing Compliance
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