

PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY P.O. Box 1231, Wenatchee, WA 98807-1231 • 327 N. Wenatchee Ave., Wenatchee, WA 98801 (509) 663-8121 • Toll free 1-888-663-8121 • www.chelanpud.org

April 7, 2017

Honorable Kimberly D. Bose, Secretary, and Nathanial J. Davis, Sr., Deputy Secretary ATTN: OEP/DHAC FEDERAL ENERGY REGULATORY COMMISSION 888 First Street, NE Washington, DC 20426

VIA ELECTRONIC FILING

Re: Rocky Reach Hydroelectric Project No. 2145 Article 402 – Operations Compliance Monitoring Plan, Amended Pages 4 and 25

Dear Secretary Bose and Deputy Secretary Davis:

On March 30, 2017, the Public Utility District No. 1 of Chelan County, Washington (Chelan PUD), filed the 2017 Operations Compliance Monitoring Plan for the Rocky Reach Hydroelectric Project (FERC No. 2145) with the Federal Energy Regulatory Commission (Commission).

Chelan PUD hereby requests that the Commission replace page 4 and page 25 of the 2017 Operations Compliance Monitoring Plan with the amended pages shown in Attachment A. These amended pages solely provide additional clarification and do not change the content of the main document or its other associated appendices. The amended pages with the tracked edits are shown in Attachment B for your information.

Please do not hesitate to contact Marcie Clement at (509) 661-4186 or me if you require additional information or have questions.

Sincerely,

Ing & Osston

Jeffrey G. Osborn License Compliance Supervisor jeff.osborn@chelanpud.org (509) 661-4176

Attachment A: Amended Page 4 and Page 25 Attachment B: Tracked Edits of Page 4 and Page 25

cc: Douglas Johnson (FERC-PRO) David Lord (FERC-PRO) Erich Gaedeke (FERC-PRO)

ATTACHMENT A

The licensee shall prepare the plan after consultation with the National Marine Fisheries Service, U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, Washington Department of Environmental Quality (sic, Washington State Department of Ecology), the Confederated Tribes of the Umatilla Reservation, the Confederated Tribes of the Colville Indian Reservation, and the Confederated Tribes and Bands of the Yakama Nation. The licensee shall include with the plan, copies of comments and recommendations on the completed plan after it has been prepared and provided to the above entities, and specific descriptions of how the entities' comments are accommodated by the plan. The licensee shall allow a minimum of 30 days for the entities to comment and to make recommendations before filing the plan with the Commission.

The Commission reserves the right to require changes to the plan. Implementation of the plan shall not begin until the plan is approved by the Commission. Upon Commission approval, the licensee shall implement the plan, including any changes required by the Commission.

To comply with Article 402 of the License, Chelan PUD includes its annual Fish Spill Plan with the filing of the annual Operations Plan. The annual filing date of the Operations Plan was revised from February 15 to March 30, to better coincide with development and required Habitat Conservation Plan Coordinating Committee (HCP CC) approval of the annual Fish Spill Plan.

On December 8, 2009, FERC approved and modified the 2009 (first) Operations Plan and on December 3, 2010, approved the 2010 Operations Plan. This document constitutes Chelan PUD's ninth Operations Plan, and is substantially the same as the 2016 Operations Plan. Changes made to the 2017 Operations Plan are limited to; Section 2.3: 2017 Unit Outages, Section 4.2: Spill Outside of Juvenile Fish Passage, and specifics associated with the Juvenile Fish Bypass Operations Plan and Fish Spill Plan (Appendices A and C).

The License requires the continued implementation of the Habitat Conservation Plan (HCP) and associated Anadromous Fish Agreement, which was incorporated into the License by Ordering Paragraphs E and F. The License also includes several provisions of the 2006 Rocky Reach Comprehensive Settlement Agreement (Settlement Agreement). It is from this document that the Rocky Reach Fish Forum (RRFF) is established to work with Chelan PUD in implementation of Chapters 2, 3, 4, 5, and 6 of the Comprehensive Plan, relating to Water Quality, White Sturgeon (*Acipenser transmontanus*), Bull Trout (*Salvelinus confluentus*), Pacific Lamprey (*Entosphenus tridentatus*), and Resident Fish, respectively. The RRFF shall also assist Chelan PUD in coordinating work plans and efforts with the HCP CC through joint membership and/or other such arrangements as the RRFF and the HCP CC may mutually devise.

The operations of the Project with regards to upstream and downstream fish passage are guided by the terms and conditions of the HCP. Approved by the Commission on June 21, 2004, the HCP is a 50-year agreement to protect four species (five stocks) of anadromous salmonids by implementing a combination of fish bypass systems, spill, off-site hatchery programs and evaluations, and habitat restoration work conducted in mid-Columbia tributary streams. This agreement was enacted by Chelan PUD with the United States Fish and Wildlife Service (USFWS), the National Marine Fisheries Service (NMFS), the Washington Department of Fish and Wildlife (WDFW), the Confederated Tribes and Bands of the Yakama Nation (YN), and the Confederated Tribes of the Colville Reservation (CCT). The HCP describes the year round Project operations necessary to protect Endangered Species Act (ESA) listed Upper Columbia River steelhead (*Oncorhynchus mykiss*) and Upper Columbia spring Chinook (*O. tshawytscha*) as well as non-listed late-run (summer/fall) Chinook salmon (*O. tshawytscha*), sockeye salmon (*O. nerka*), and coho salmon (*O. kisutch*) (collectively referred to as "Plan Species"). A HCP CC, consisting of one member from each of the signing Parties, oversees the implementation of the HCP. The HCP CC will be used as the primary means of consultation between Chelan

SECTION 6: DRYDEN AND TUMWATER FISHWAYS AND TRAPS

The fishways and traps are located adjacent the Dryden and Tumwater dams at river miles 17.6 and 32, on the Wenatchee River, respectively. The Wenatchee River is a tributary of the Columbia River, with the confluence located approximately 5.3 miles downstream of Rocky Reach Dam. The Dryden and Tumwater fishway facilities are owned and operated by Chelan PUD.

Chelan PUD uses the fish ladders and traps at these facilities to provide passage and to collect broodstock for its salmon and steelhead hatchery programs, which are required pursuant to the HCP, as outlined in annual broodstock collection protocols approved by the HCP Hatchery Committees. Ongoing hatchery mitigation activities at these facilities are required by the License as mandated by USFWS' incidental take statement, and as such, the fish ladders and trapping facilities at Dryden and Tumwater are project works through Ordering Paragraph (B)(2) and Article 204 of the License.

6.1 Dryden Fishway and Trap

At Dryden left and right bank fishways, the start of fishway operations and operations in general are based on river flows and the need for alternative fish passage routes. At Dryden left bank fishway, the fishway is opened for fish passage when river flow declines below six kcfs (headgates are removed). At Dryden right bank, the threshold is also six kcfs. The fishway attendants may open the fishways during slightly higher flows, if they observe that fish are beginning to have difficulty in migrating over the spillway (due to a declining hydrograph). The fishways remain in continuous operation throughout the year. When river flow reaches six kcfs or greater, head gates are deployed, at the discretion of the fishway attendants, to prevent the influx of sand and sediment.

The Dryden fish traps operate from July 1 through the end of November (or until the required number of coho and steelhead/Chinook are collected for the Yakama Nation and Eastbank Hatchery's broodstock programs, respectively). Both traps are operated continuously on a weekly basis, Sunday night through Friday afternoon. WDFW personnel operate the traps from July through August. Yakama Nation personnel operate the traps from September through November. Adult summer Chinook, steelhead and coho are collected at the Dryden fish traps.

6.1.1 Inspection and Maintenance

Site visits for operation vary throughout the operating year, from as few as three times per week to twice daily visits. Inspections of the ladder (including fishway hydraulics), attraction water intake screens, trashracks, and staff gauges are conducted during these site visits. Daily monitoring of weather and river flow conditions is necessary to determine when additional site visits are required to keep the facility operating within the established criteria.

Initial maintenance (prior to start-up) occurs before trapping operations commence in the summer. In addition, PUD mechanics normally conduct an annual structural inspection in the late spring. Winterization of the trapping facilities is conducted immediately following the conclusion of fish trapping operations for the year. The general purpose of winterization is to protect the facilities from freezing temperatures and damage due to ice formation.

6.2 <u>Tumwater Fishway and Trap</u>

The Tumwater fishway operates year round, with the exception of 1) the annual overhaul period (generally one week in February), and 2) river flow of 10 kcfs or greater at which point head gates are deployed for structure protection. WDFW (under contract with the PUD) and the Yakama Nation trap adult steelhead, spring Chinook, summer Chinook, sockeye, and coho from mid to late-February through mid-December (or until weather conditions prohibit trap operations). Depending on the time of year, the following trapping

ATTACHMENT B

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