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Cc: [Sokolowski, Rosana](#)
Subject: Chelan River operations: pump station operation and ramping rates
Date: Tuesday, November 22, 2016 9:25:32 AM

Dear Chelan River Fishery Forum: While in Washington D.C last week, I spoke with T.J. Lovullo, Aquatic Resources Branch Chief at the Federal Energy Regulatory Commission (FERC), regarding Chelan River operations, specifically pump station operation (4 pumps versus 5) and ramping rates for pump station shut-down. The Forum has recommended 4 pump versus 5 pump operation for the past 3 or 4 years to provide spawning flows for both steelhead and Chinook salmon. Chelan PUD has sent letters to FERC notifying them of the temporary modifications to the license condition to provide spawning flows of 320 cfs as part of the Adaptive Management component of the Lake Chelan license. I spoke with T.J also about the ramping rate deviations from the 2 inches per hour requirement in the license that occurs when pumps at the pump station are shut down at the end of the spring and fall spawning periods. I shared with him that the Forum conducted a Ramping Rate Investigation in May 2014 and observed only a few Chinook fry stranded during pump station shut down. The intent of my discussion was to inform him that Chelan PUD intends to: 1) send him a notification letter of temporary pump station operation of 4 pumps versus 5 pumps likely until the 2019 water quality certification check-in date; and 2) send him a letter to amend the ramping rate requirements in the license from 2 inches per hour to the actual water level elevation changes observed during the ramping rate investigation when pumps were shut down sequentially.

He provided the following feedback:

1. FERC's definition of a temporary condition is 2 to 3 weeks;
2. Because the Forum recommended operation of 4 pumps versus 5 pumps as implemented for several years and may for several more, a license amendment (versus a notification letter) is needed to continue 4 pump operations;
3. What is occurring "on the ground" needs to be consistent with the license article language;
4. We discussed that the amendment would extend through the 2019 check-in date, and could be amended again at that time depending upon determinations with Ecology and the Forum;
5. The amendment would amend the plans where pump station operation was identified (Article 405, which required the Operations Compliance Monitoring Plan (OCMP); Article 408, which requires the Threatened and Endangered Species Protection Plan (TESPP); and the 401 water quality certification);
6. A similar, but separate, letter, with references to the appropriate license articles (Article 405: OCMP), would need to be filed for the ramping rate amendment;
7. The final Ramping Rate Investigation report would need to accompany the ramping rate letter;
8. Consultation with the Forum would need to be included with both letters to ensure consultation was conducted with, and the PUD received mutual agreement from, license stakeholders; and
9. Letters need to be filed as soon as possible in order for FERC to review and approve the

amendments prior to initiating flows for the spring steelhead spawning period (March 15, 2017) and ramping rates pump station shut down (May 15, 2017).

T.J.'s response was a bit surprising to me at first, but his comment of "what is happening on the ground should match the license language" made total sense after discussing further. That and FERC's definition of "temporary," which is quite different than what I was thinking. Therefore, my proposal is to issue a pump station letter, amending spawning flow operations to 4 pumps or the same flow provided from the low level outlet, by the first week of December. I need to work with Steve Hays to complete the Ramping Rate Investigation, route that report to you for review, finalize the report, and then file a ramping rate amendment letter with the report as soon after the first of the year as possible. This plan, of course, is all predicated upon support from the Forum.

My request to the Forum is to send me an email response from each of you to this proposal that includes your recommendation for moving forward. As always, please feel free to give me a call if you have questions, concerns, suggestions, comments, whatever.

Lots to ponder, but thank you very much, in advance, for your consideration.

Jeff

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