

VIA ELECTRONIC FILING

January 30, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Mail Code: DHAC, PJ-12
888 First Street, N.E.
Washington, D.C. 20426

RE: P-2114-266 - Priest Rapids Hydroelectric Project - Request to end implementation of Interim Fish Passage Operations Plan and complete emergency ESA Consultation

Dear Ms. Bose,

As you are aware, the Wanapum Dam Reservoir was drawdown below its normal operating range from February through November, 2014 due a fracture that was discovered on Monolith 4 of the dam. On March 19, 2014, the Federal Energy Regulatory Commission (FERC) designated the Public Utility District No. 2 of Grant County, Washington (Grant PUD) as its non-federal representative for emergency consultation under Section 7 of the Endangered Species Act (ESA) and 50 CFR § 402.05 with the National Marine Fisheries Service (NMFS) and US Fish and Wildlife Service (USFWS). This consultation was in regards to potential effects to federally-listed species during the emergency drawdown of the Wanapum Dam Reservoir.

On March 21, 2014, Grant PUD filed with FERC an Interim Fish Passage Operations Plan (IFPOP) for the Priest Rapids Project¹ in response to the emergency drawdown at Wanapum Dam. The IFPOP was developed in consultation with the Priest Rapids Coordinating Committee² and was approved by FERC on March 26, 2014.

Ordering paragraph (A) of FERC's March 26, 2014 approval of the IFPOP states:

“The Interim Fish Passage Operations Plan filed by the Public Utility District No. 2 of Grant County, Washington (licensee) on March 21, 2014 is approved, as modified by ordering paragraph (B) below. The approved plan shall remain in effect until further order of the Commission”.

¹ Order Issuing New License, issued April 17, 2008 (123 FERC ¶ 61,049).

² Priest Rapids Coordinating Committee includes National Marine Fisheries Service, US Fish and Wildlife Service, Yakama nation, Washington Department of Fish and Wildlife, Colville Confederated Tribes and Umatilla Confederated Tribe

Throughout the emergency drawdown, Grant PUD conducted informal and expedited consultation under the emergency provisions of Section 7 of the ESA and adaptively managed the refinement and implementation of IFPOP in consultation with the NMFS, USFWS and PRCC throughout 2014 and the first quarter 2015. Specific details on the consultation, temporary fish ladder modifications, and implementation of the IFPOP can be reviewed in the status updates that were provided to FERC on May 1, June 5, September 12, and November 21 of 2014 in accordance with ordering paragraph (B) of the March 26, 2014 Order approving the IFPOP.

On November 25, 2015, Grant PUD initiated a partial refill of the Wanapum Reservoir, and reached the target elevation of 562' above mean sea level (msl) on December 1, 2014. The current operational range of Wanapum Reservoir is 558'-562' msl, while repairs to the Wanapum Spillway continue. In anticipation of the partial refill, Grant PUD removed the temporary Wanapum Fishway Exit Passage Systems (WFEPS) from both the left (LB) and right bank (RB) fish ladder of Wanapum Dam.

Currently, both the LB and RB adult fish ladders at Wanapum Dam are fully operational and provide unimpeded fish passage at Wanapum Dam, and all the temporary modifications from the Interim FFP have been removed. In accordance with requirements in the Priest Rapids Project License Biological Opinions from both USFWS and NOAA Fisheries, Grant PUD is able to maintain at least one fishway in operation year-round to provide fish passage. In addition, temporary modifications implemented to support the trap and transport program for adult salmonids and steelhead at the Priest Rapids Dam Off Ladder Adult Fish Trap (OLAFT) have been removed and the OLAFT has been returned to normal operation.

Based on the most current information available, Grant PUD believes that the emergency response that occurred throughout 2014 and in the first quarter of 2015 will pass by May 1, 2015, and therefore respectfully requests that FERC determine that the emergency response will be under control as May 1, 2015 and is ready for ESA analysis, and subsequently that Grant PUD end implementation of the IFPOP on May 1, 2015 and resume normal operation of its fish passage facilities. Grant PUD is providing the proposed timeline for ending implementation of the IFPOP and completing the necessary ESA analysis for your consideration in Table 1 below.

Table 1 Proposed timeline for ending implementation of the IFPOP and emergency ESA consultation

Proposed Action	Proposed Date
End implementation of the Interim Fish Passage Operations Plan (Interim FFP). The full extent of the response to correct the Wanapum Dam safety incident is determined and thus potential effects to ESA listed fish can be estimated, and the situation is sufficiently stable to allow preparation of a biological assessment (BA). Thus Grant PUD proposes a conclusion of necessary Emergency ESA consultation as normal adult fish passage has been restored at Wanapum Dam and all temporary modifications installed in the fish ladders and at Priest Rapids Dam OLAFT have been removed.	May 1, 2015
Grant PUD provides draft Biological Assessment to FERC for review.	June 12, 2015

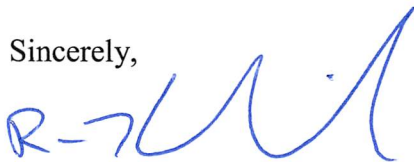
Bose (Request to end implantation of IFPOP and complete emergency ESA Consultation)

January 30, 2015

Page 3 of 3

FERC staff with any questions can contact me at 509-793-1468 or rhendr1@gcpud.org

Sincerely,



Ross Hendrick
License Compliance Manager

CC: PRCC
Jeff Krupka – USFWS
Scott Carlon – NOAA