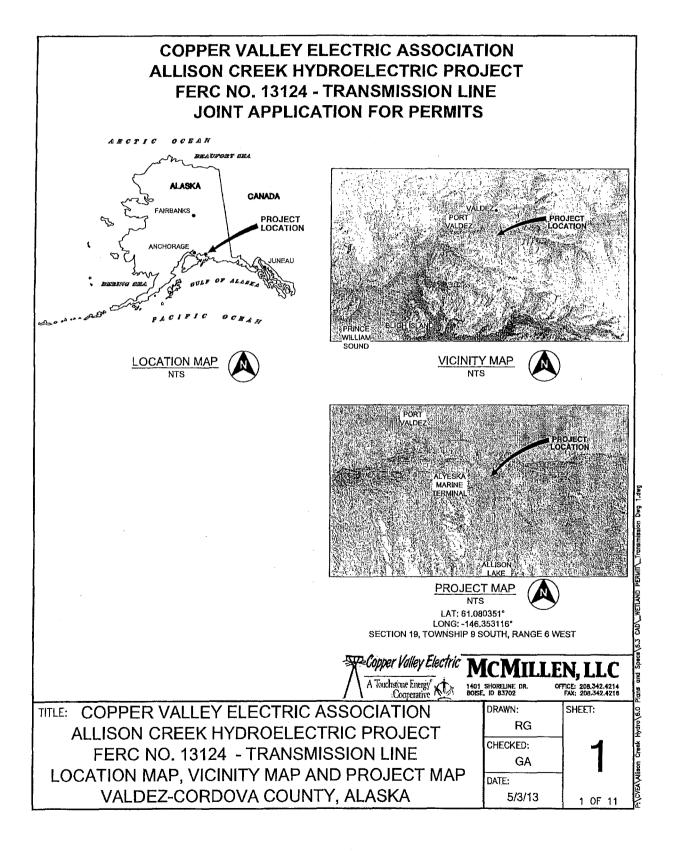
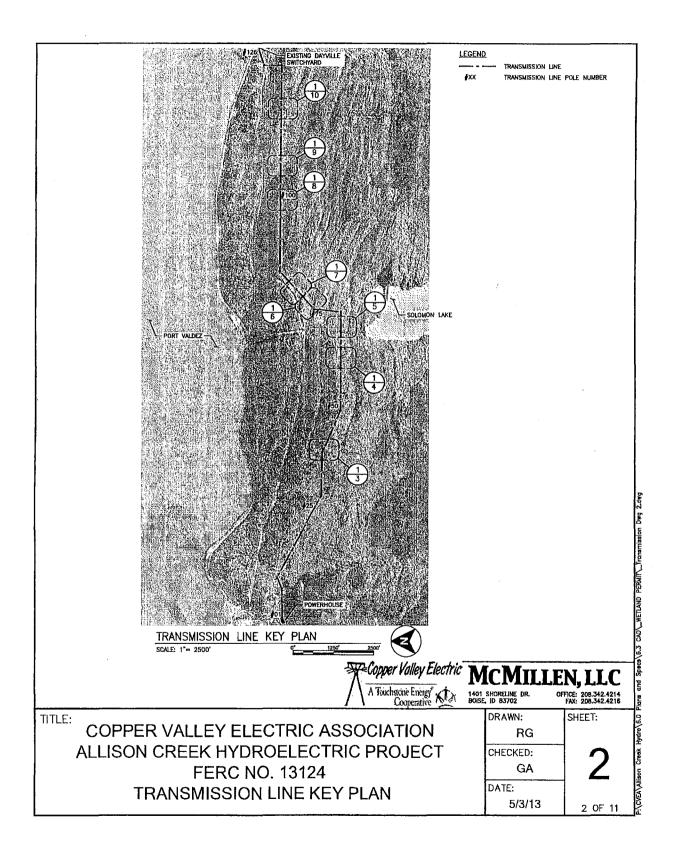
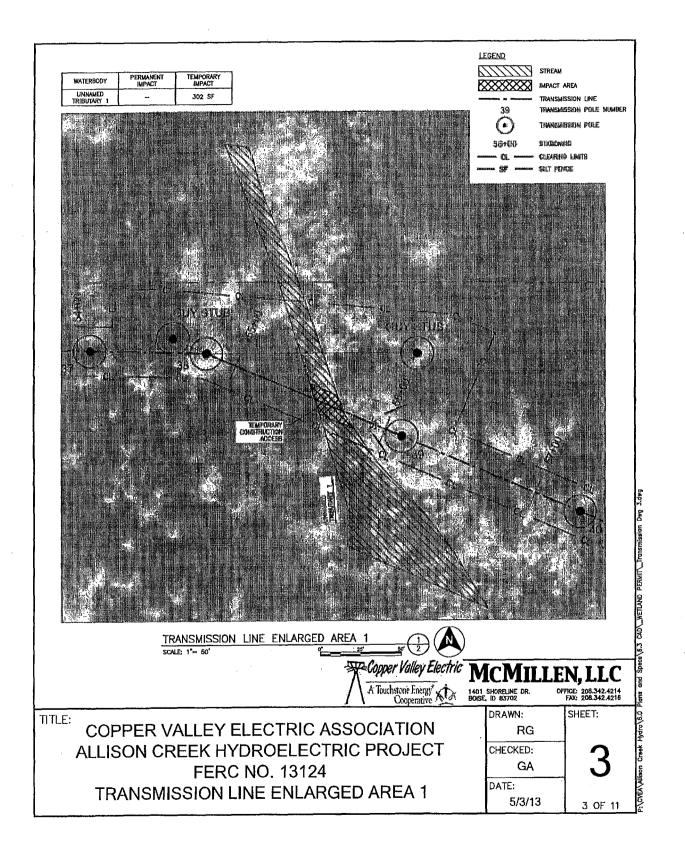
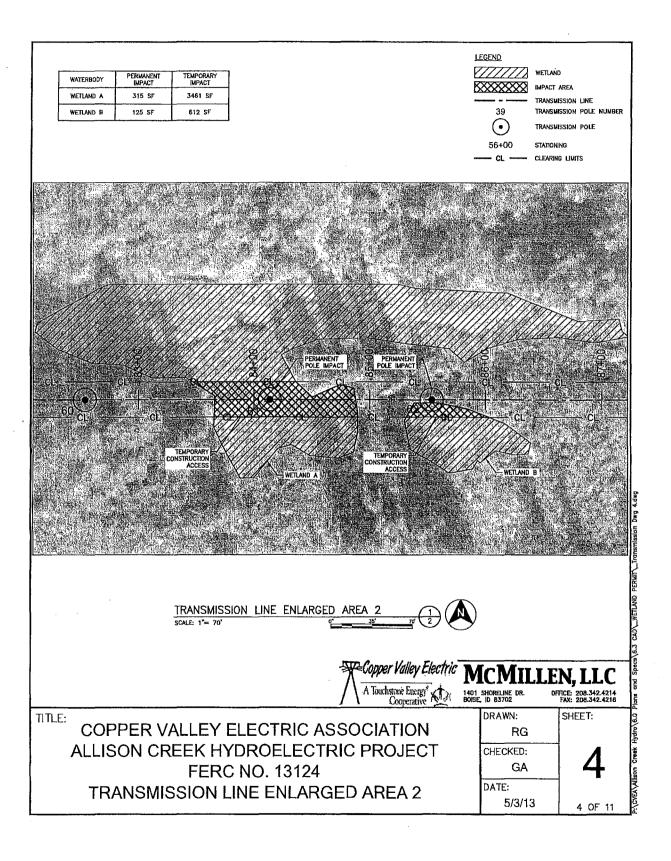
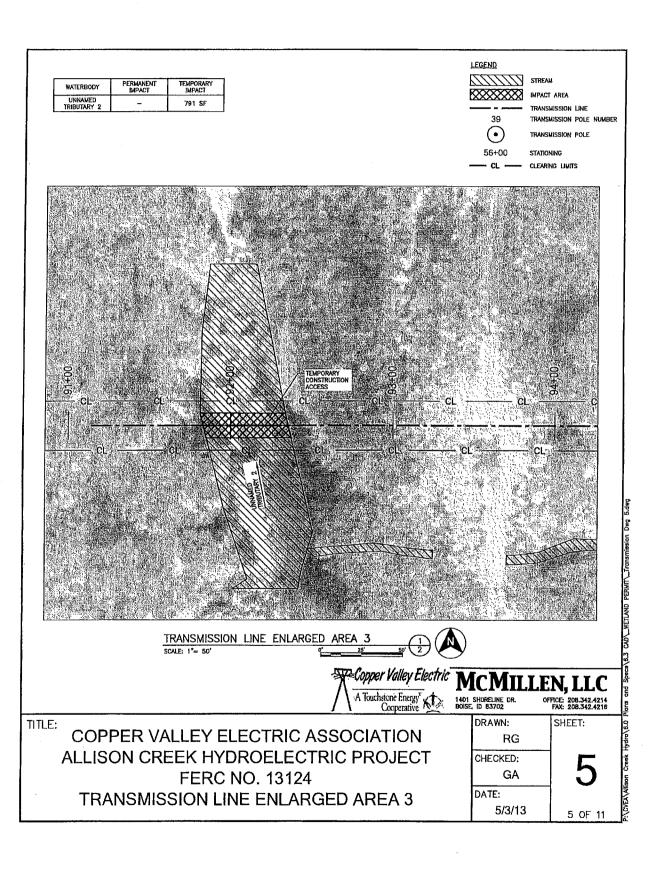
POA-2008-1257, Allison Creek, Hydroelectri Project Copper Valley Electric Association, Inc. Lat. 61.0555 N., Long. 146.3481 W. Sheet 1 of 45, May 3, 2013

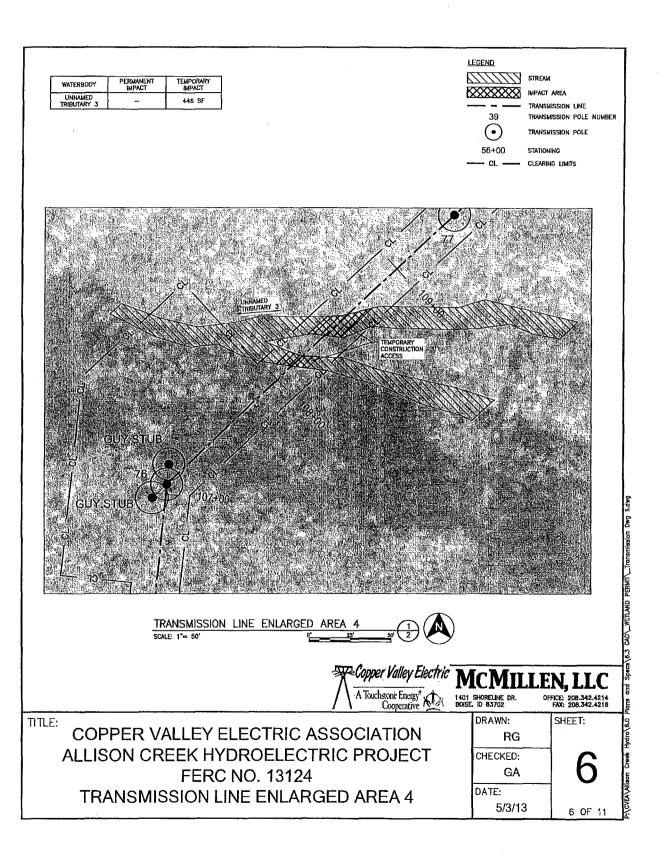


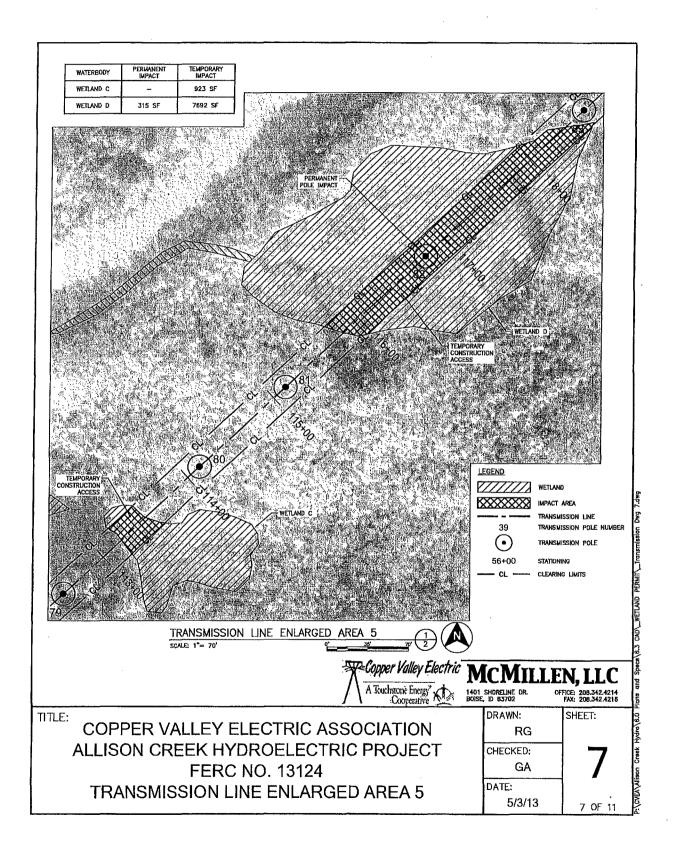


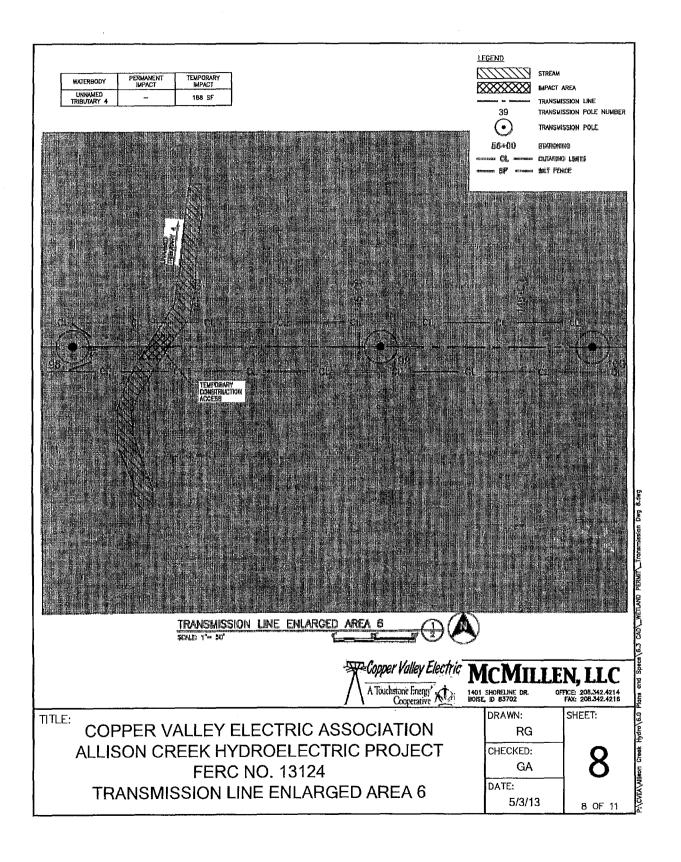




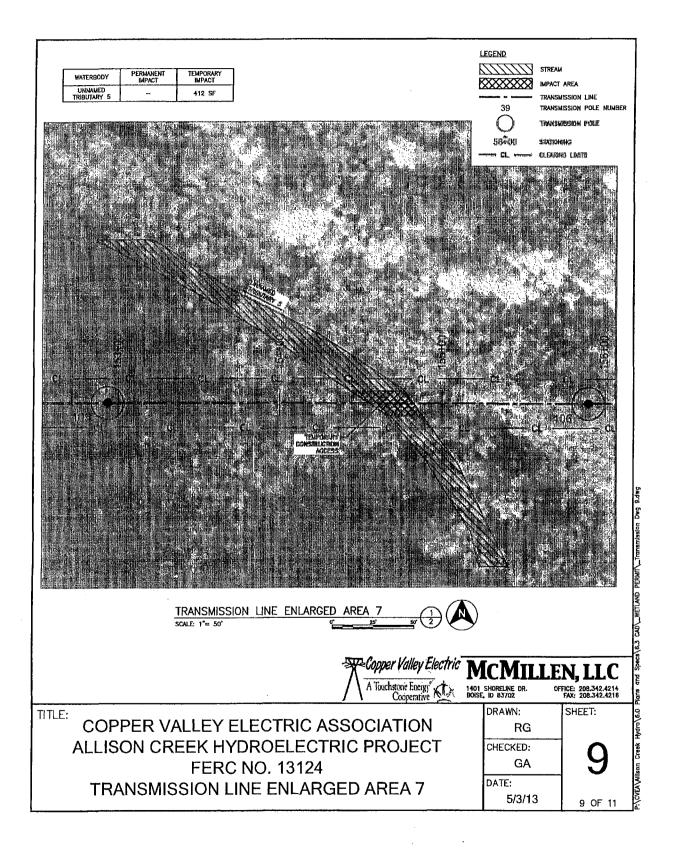




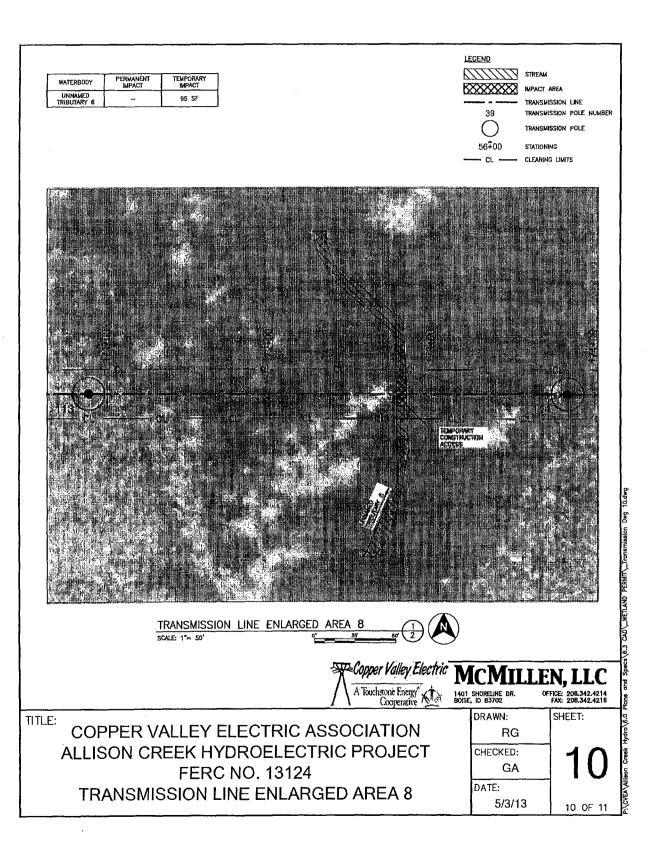


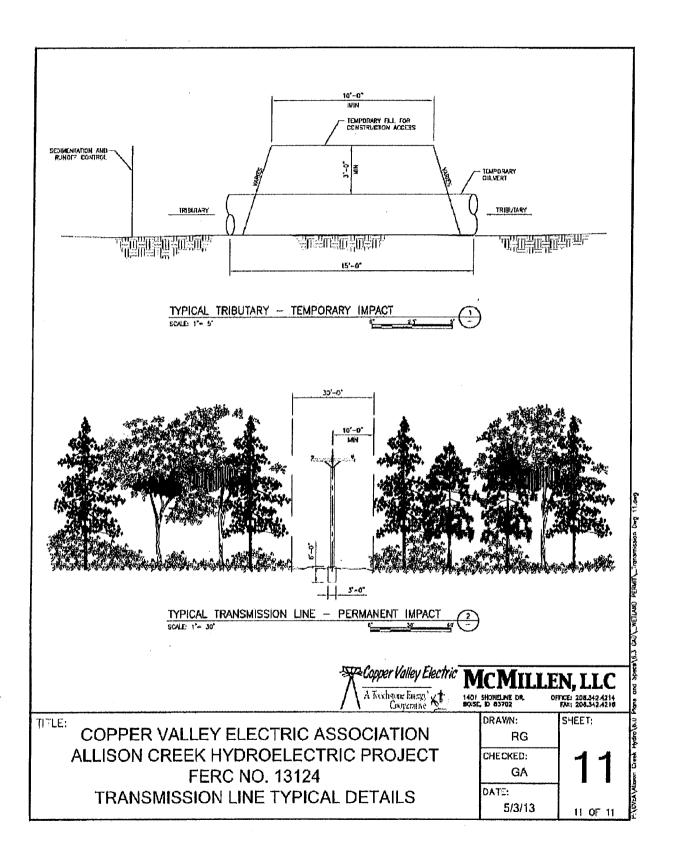


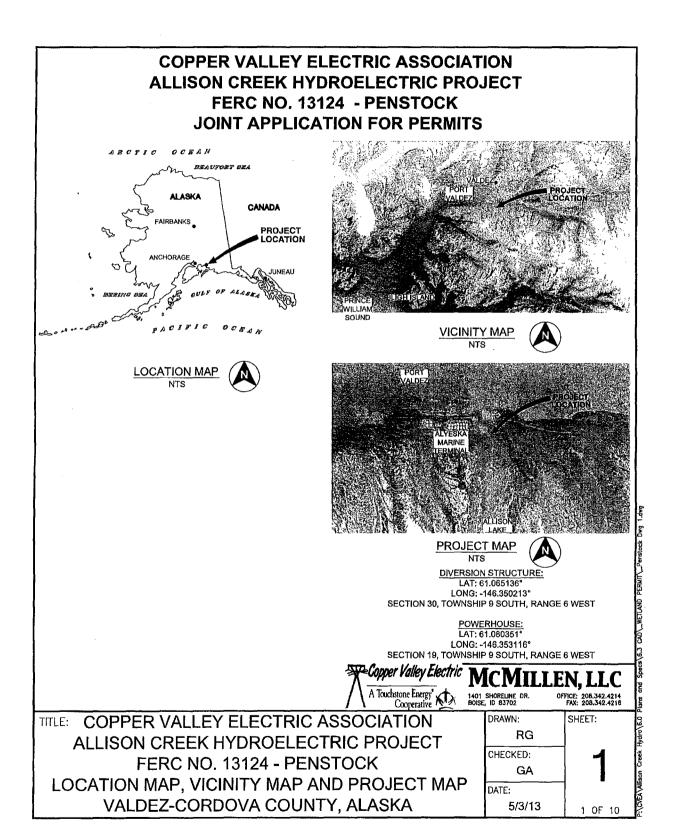
POA-2008-1257, Allison Creek, Hydroelectri Project Copper Valley Electric Association, Inc. Lat. 61.0555 N., Long. 146.3481 W. Sheet 9 of 45, May 3, 2013

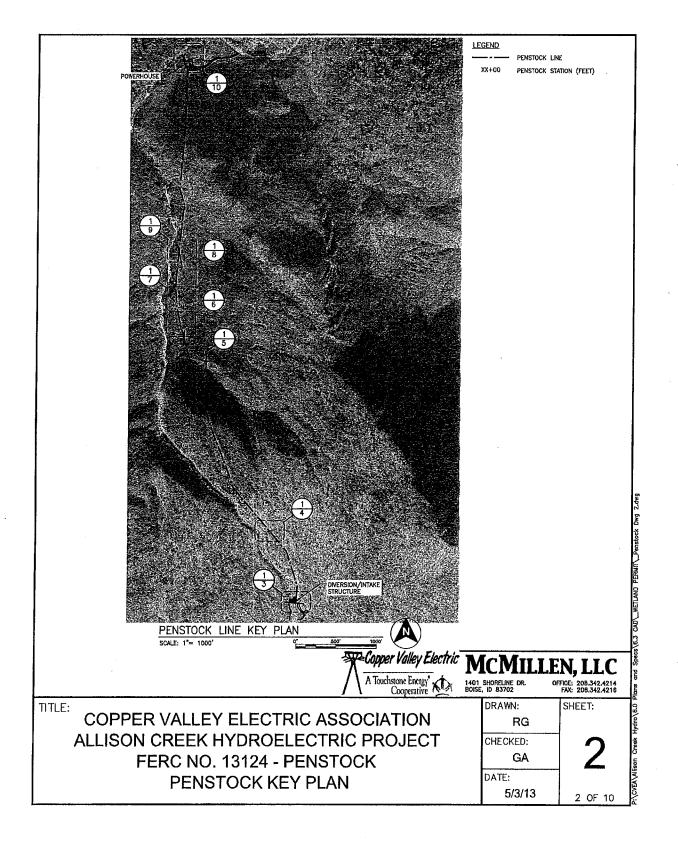


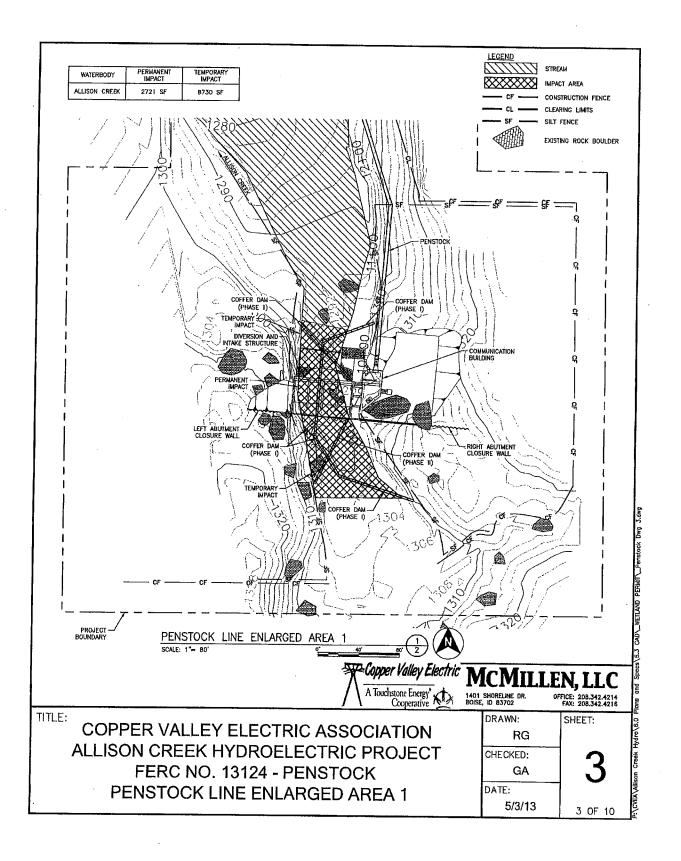
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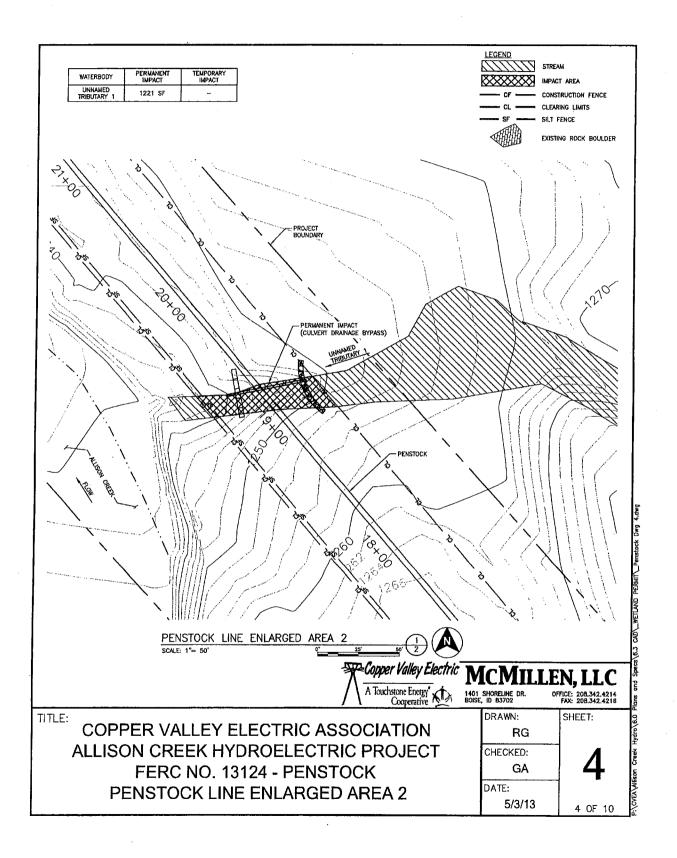


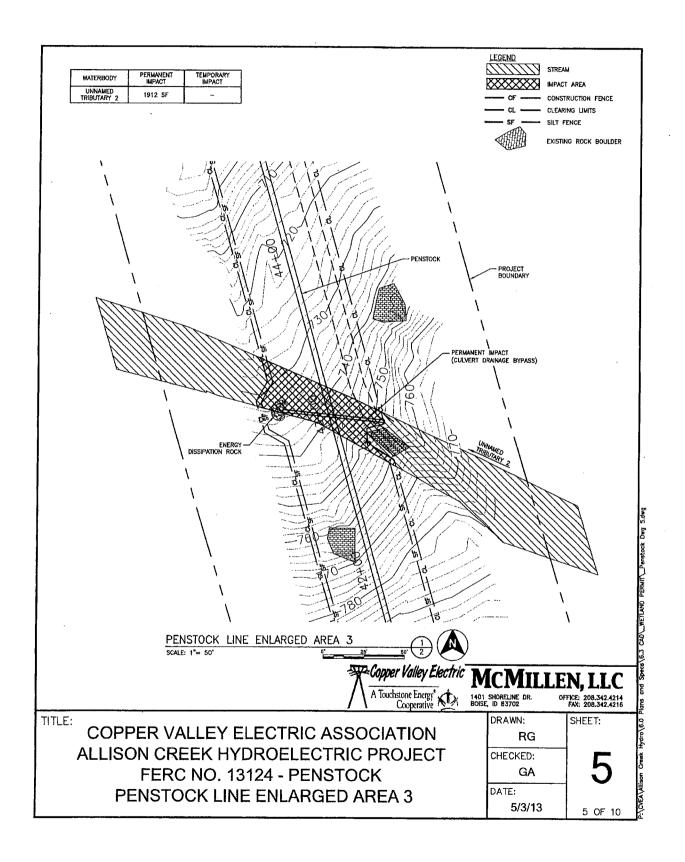


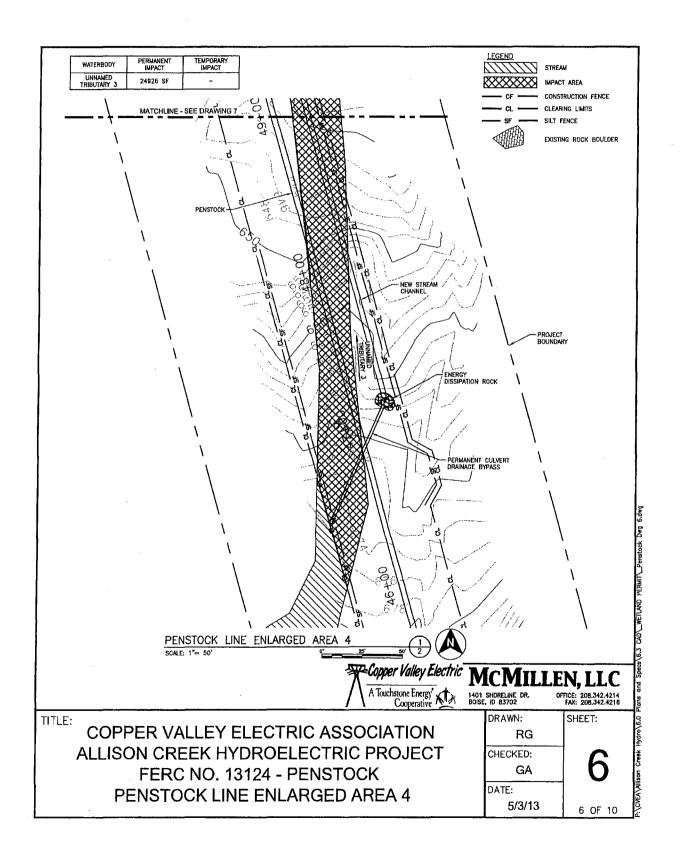


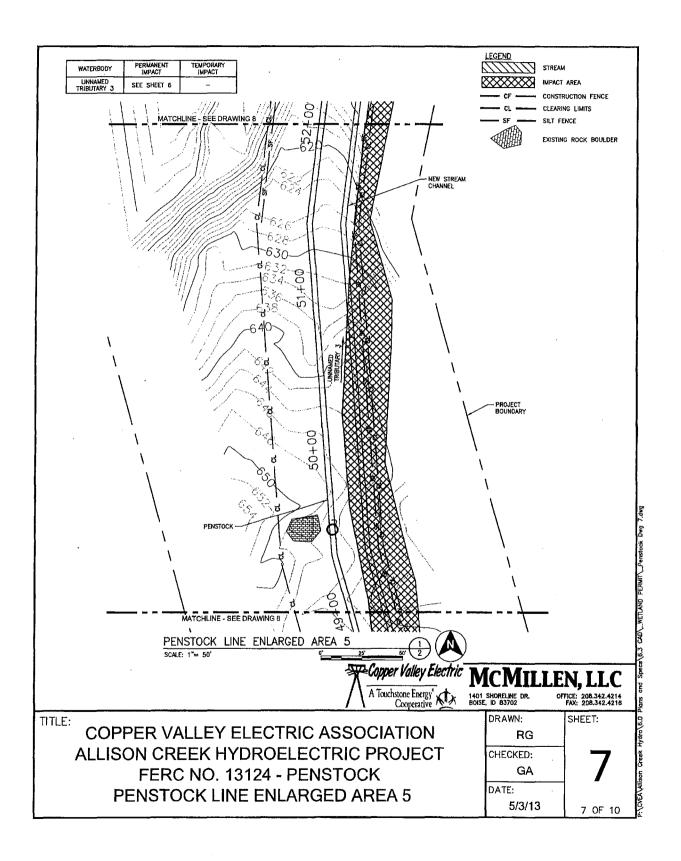


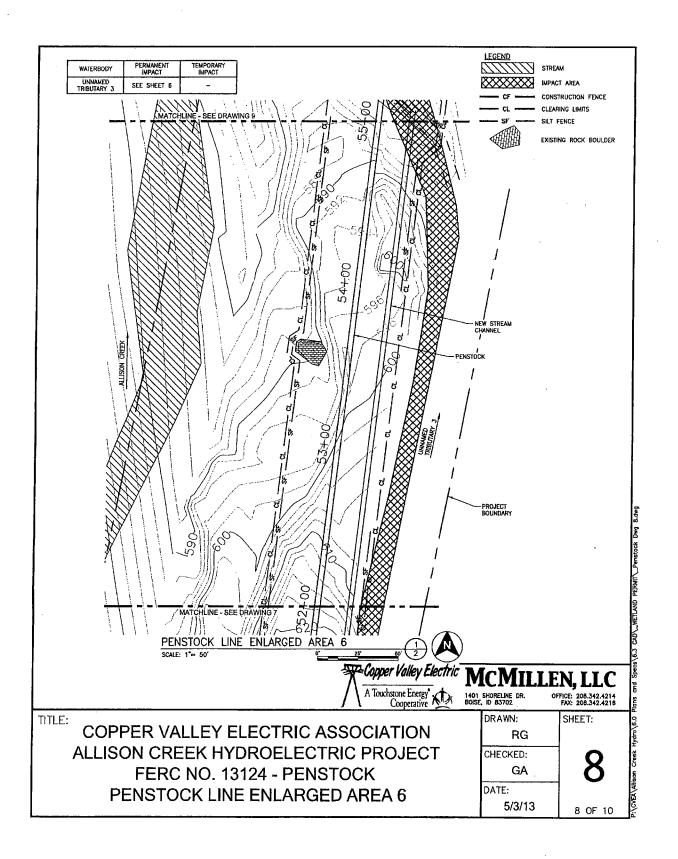


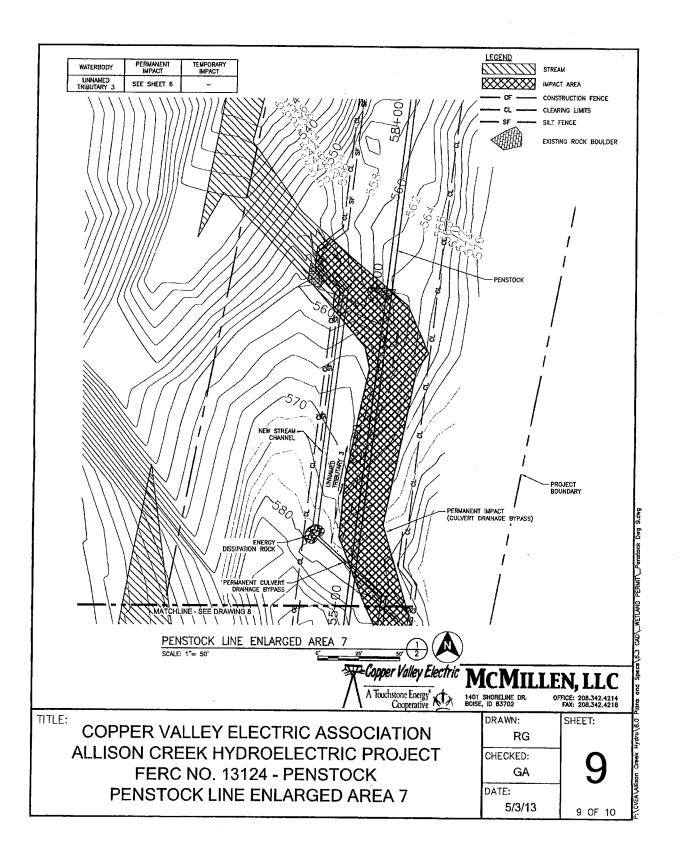


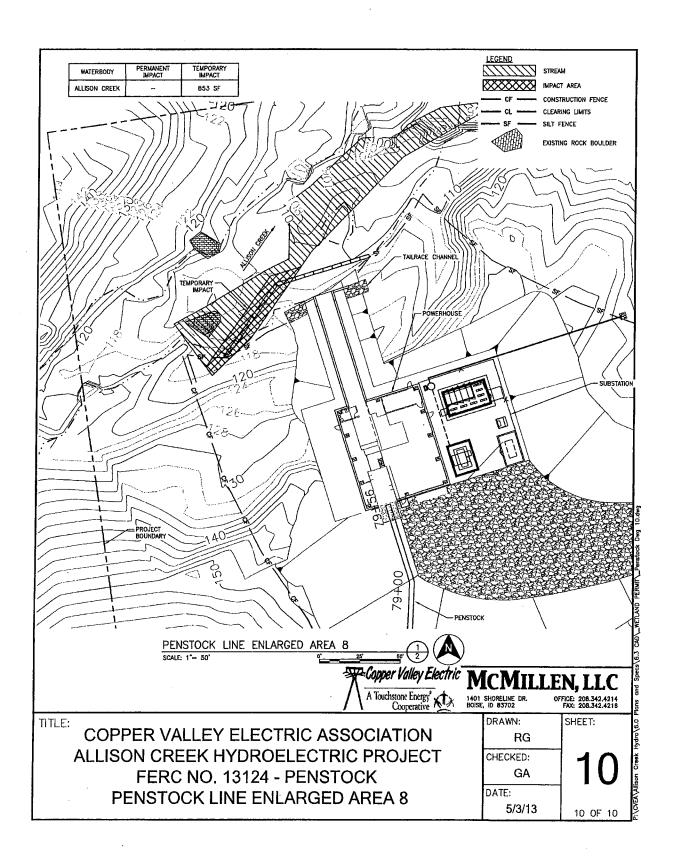


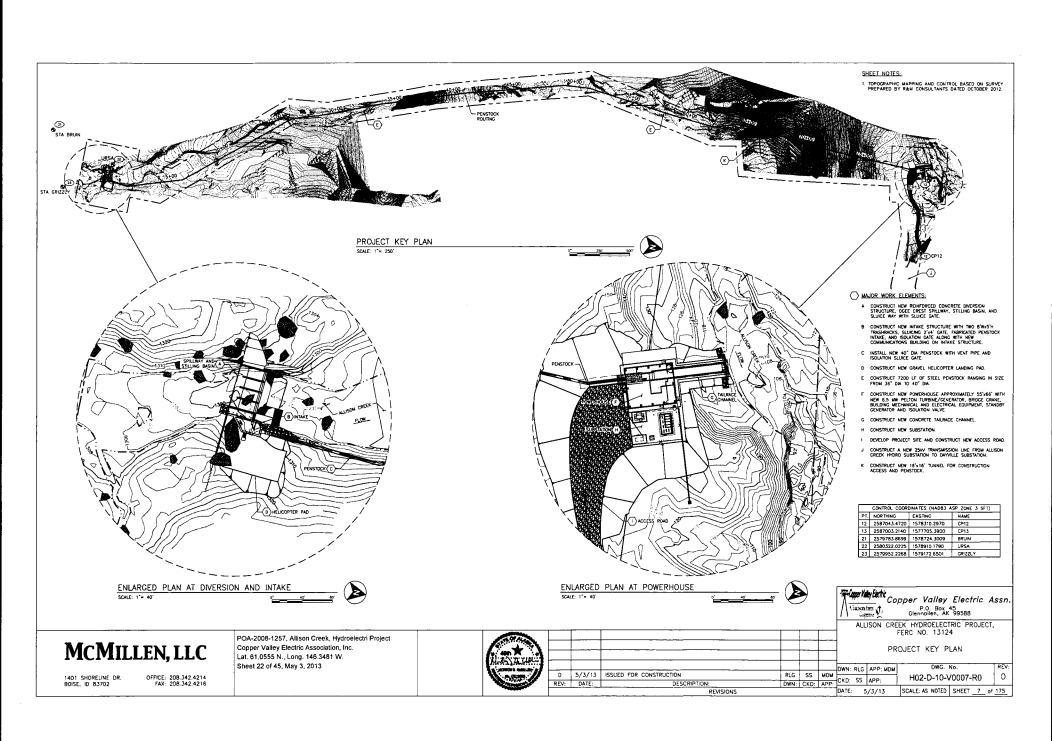




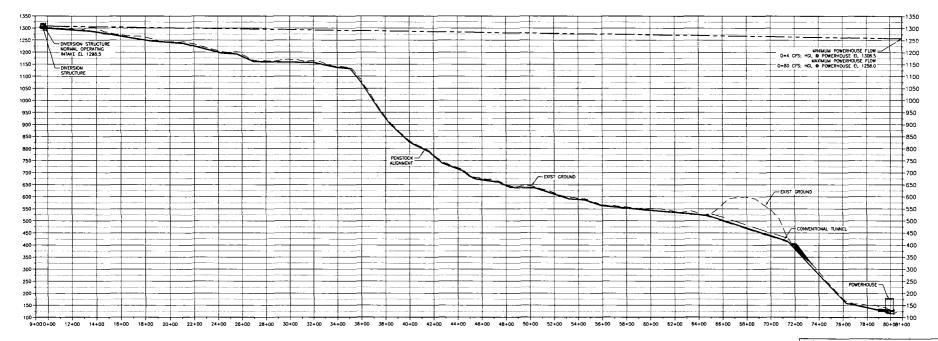








		PROJECT DESIGN CRIT	ERIA		
CRITERIA	VALUE	CRITERIA	VALUE	CRITERIA	VALUE
RAINAGE BASIN		HYDROLOGY - (POWERHOUSE STRUCTURE)		POWERHOUSE TURBINE UNIT	
WATERSHED AT DIVERSION STRUCTURE	5.75 SQUARE MILES	2-YEAR		NO. OF TURBINES	1
TOTAL WATERSHED	7.53 SOUARE MILES	A. DISCHARGE	294 CFS	TURBINE TYPE	PELTON
ALLISON LAKE ELEVATION	1360 FT MSL	B. 5% CONFIDENCE INTERVAL	156 CFS	MINIMUM FLOW	4 CFS
YDROLOGY - (DIVERSION STRUCTURE)		C. 95% CONFIDENCE INTERVAL	552 CFS	MAXIMUM FLOW	80 CFS
2-YEAR		100-YEAR		RATING	6.5 MW
A. DISCHARGE	259 CFS	A. DISCHARGE	756 CFS	PLANT FACTOR	0.9 KV
B. 5% CONFIDENCE INTERVAL	137 CFS	B. 5% CONFIDENCE INTERVAL	378 CFS	SPEED	514 RPM
C. 95% CONFIDENCE INTERVAL	488 CFS	C. 95% CONFIDENCE INTERVAL	1510 CFS	STATIC HEAD PRESSURE	510 FT
1D0-YEAR		MINIMUM FLOW	8 TO 10 CFS	PENSTOCK PIPELINE	
A. DISCHARGE	667 CFS			SEE PENSTOCK SUMMARY TABLE ON SHEET HO2-D-31	-V0001-RD
B. 5% CONFIDENCE INTERVAL	333 CFS				
C. 95% CONFIDENCE INTERVAL	1340 CFS				
MINIMUM FLOW	2 CFS				



HYDRAULIC PROFILE @ 80 CFS

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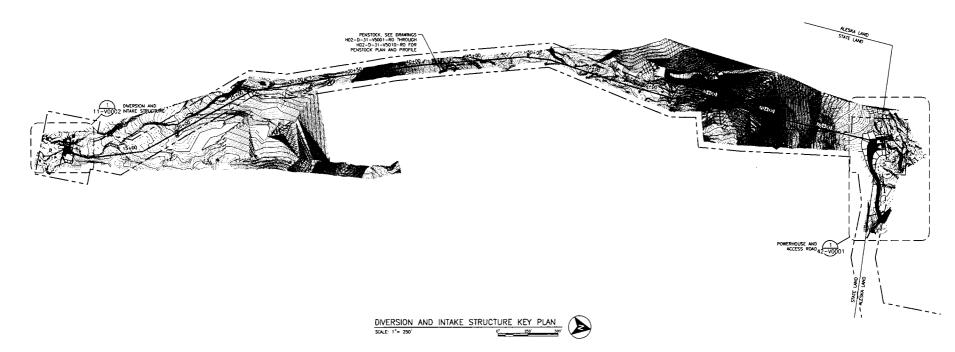
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POA-2008-1257, Allison Creek, Hydroelectri Project Copper Valley Electric Association, Inc. Lat. 61.0555 N., Long. 146.3481 W. Sheet 24 of 45, May 3, 2013



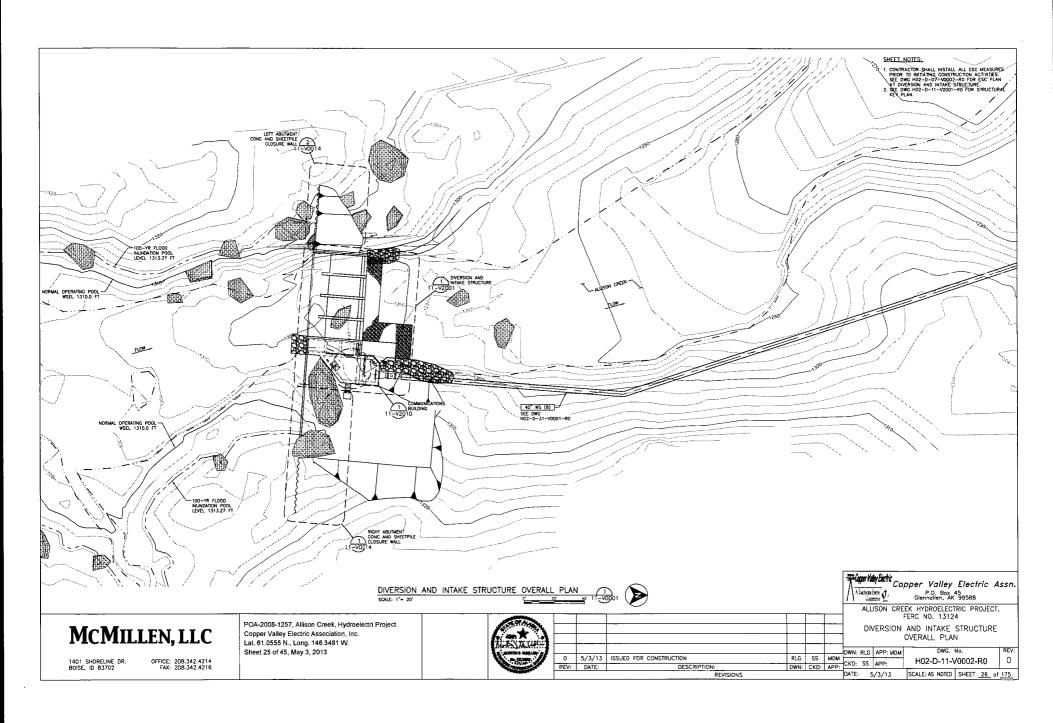
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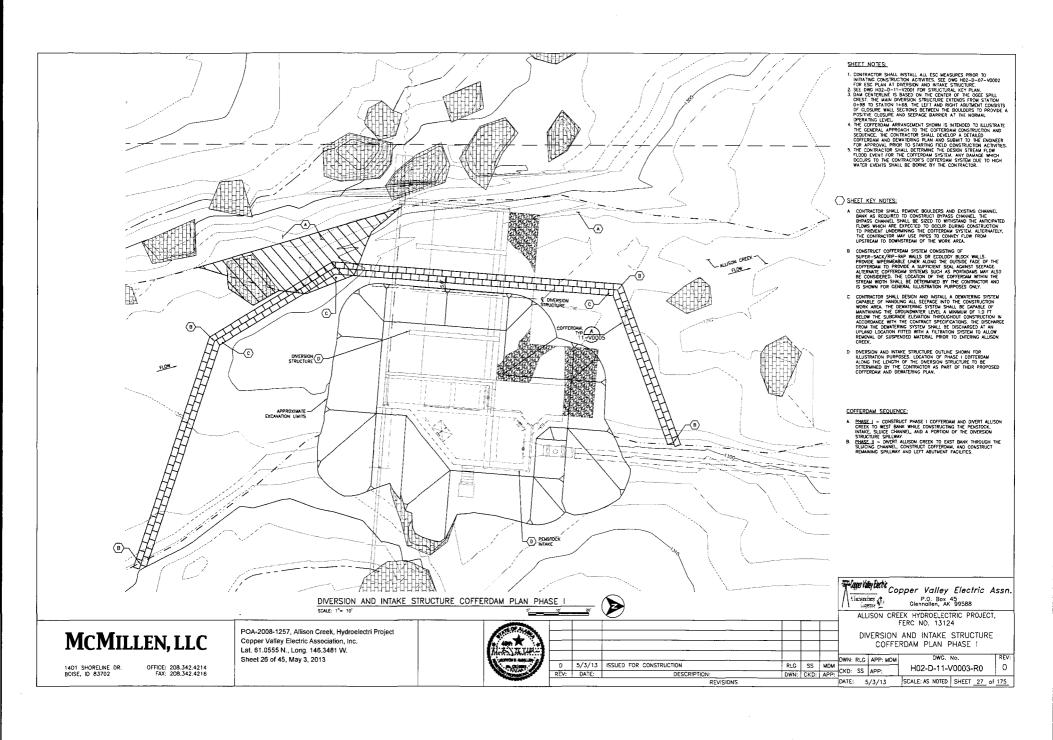
Copper Valley Electric Assn. Alutenebes (†) P.O. Box 45 Glennailen, AK 99588

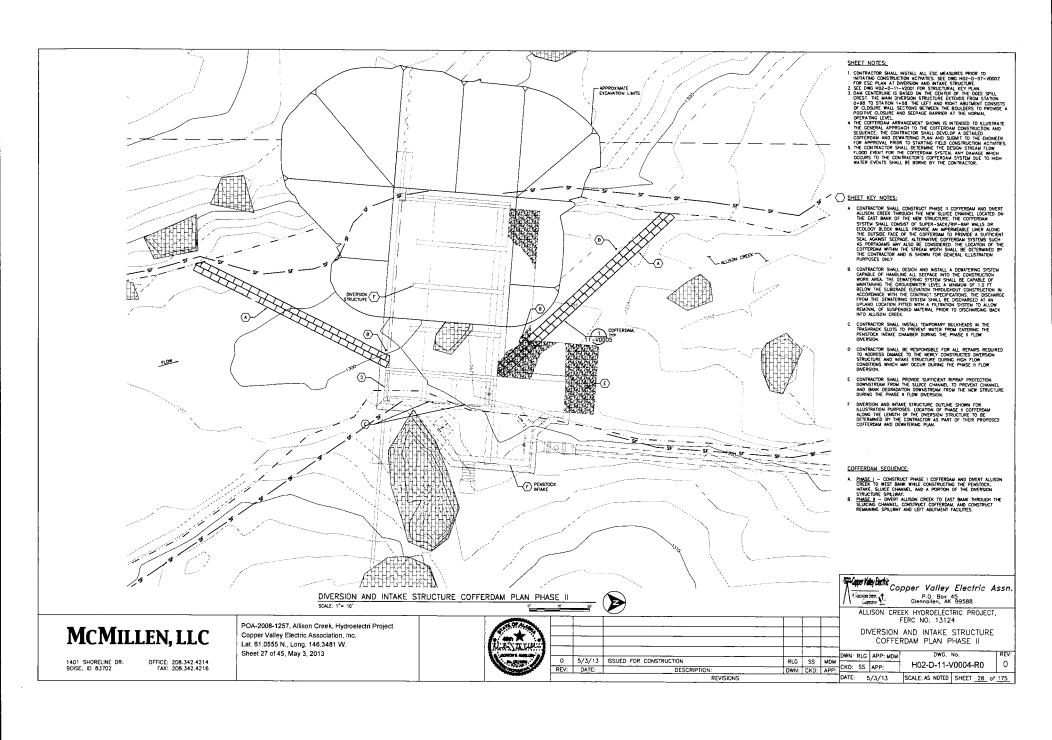
ALLISON CREEK HYDROELECTRIC PROJECT, FERC NO. 13124

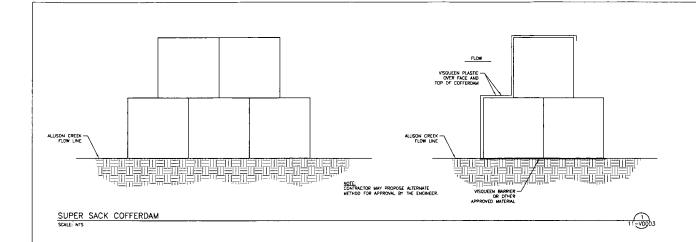
DIVERSION AND INTAKE STRUCTURE KEY PLAN

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1401 SHORELINE DR. BOISE, ID 83702 OFFICE: 208.342.4214 FAX: 208.342.4216 POA-2008-1257, Allison Creek, Hydroelectri Project Copper Valley Electric Association, Inc. Lat. 61.0555 N., Long. 146.3481 W. Sheet 28 of 45, May 3, 2013



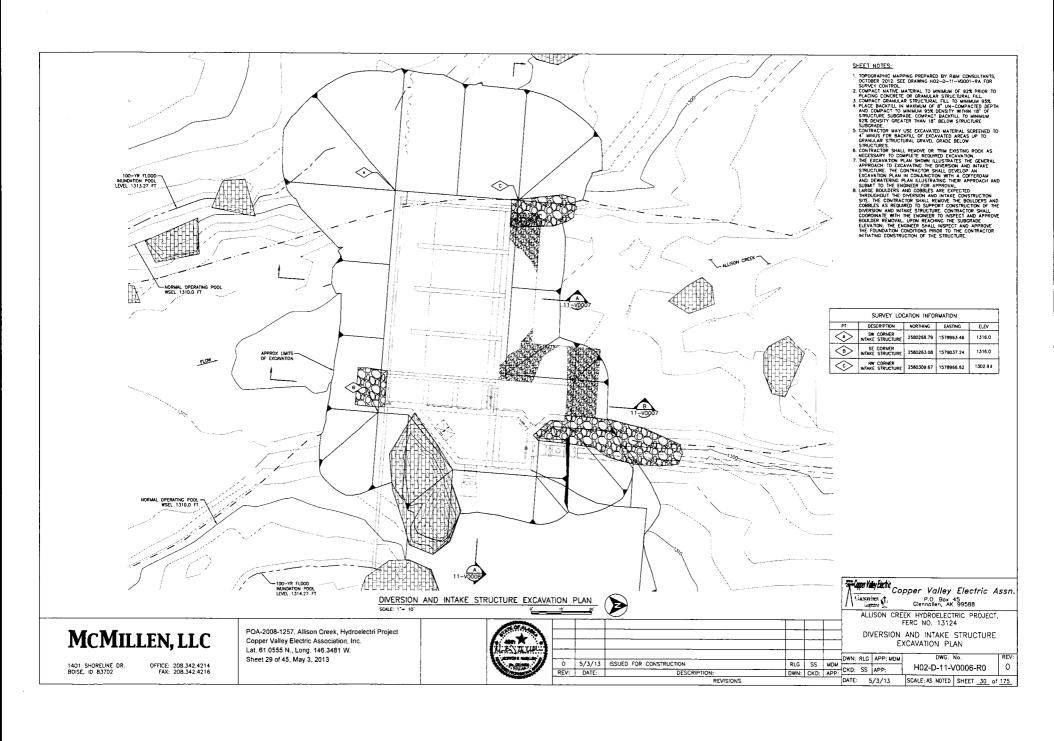
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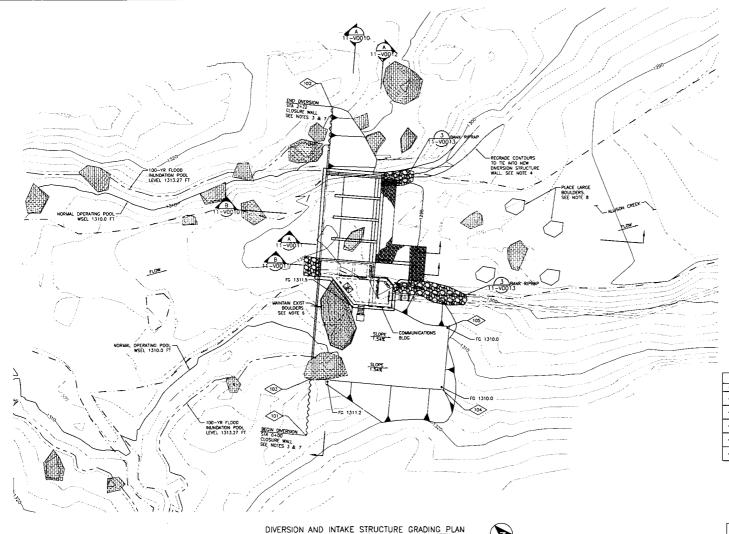
Copper Valley Electric Assn.

ALLISON CREEK HYDROELECTRIC PROJECT, FERC NO. 13124

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SHEET NOTES:

- SHEET NOTES:

 1. CONTRACTOR SHALL INSTALL ALL ESC MEASURES PRIOR TO MITATING CONSTRUCTION ACTIVITIES SEE DWC MITATING CONSTRUCTION ACTIVITIES SEE DWC MITATING STRUCTURE.

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COORD	NORTHING	EASTING	LOCATION						
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√ 102>	2580273.94	1578922.78	SW CORNER OF CLOSURE WALL						
√ 03>	2580259.95	1579103.75	CORNER OF CLOSURE WALL AT BOULDER (APPROX)						
€	2580348.54	1579110.72	NE CORNER OF HELICOPTER LANDING PAD						
(105)	2580352.30	1579068.79	NW CORNER OF HELICOPTER LANDING PAD						

1401 SHORELINE DR. BOISE, ID 83702

OFFICE: 208.342.4214 FAX: 208.342.4216

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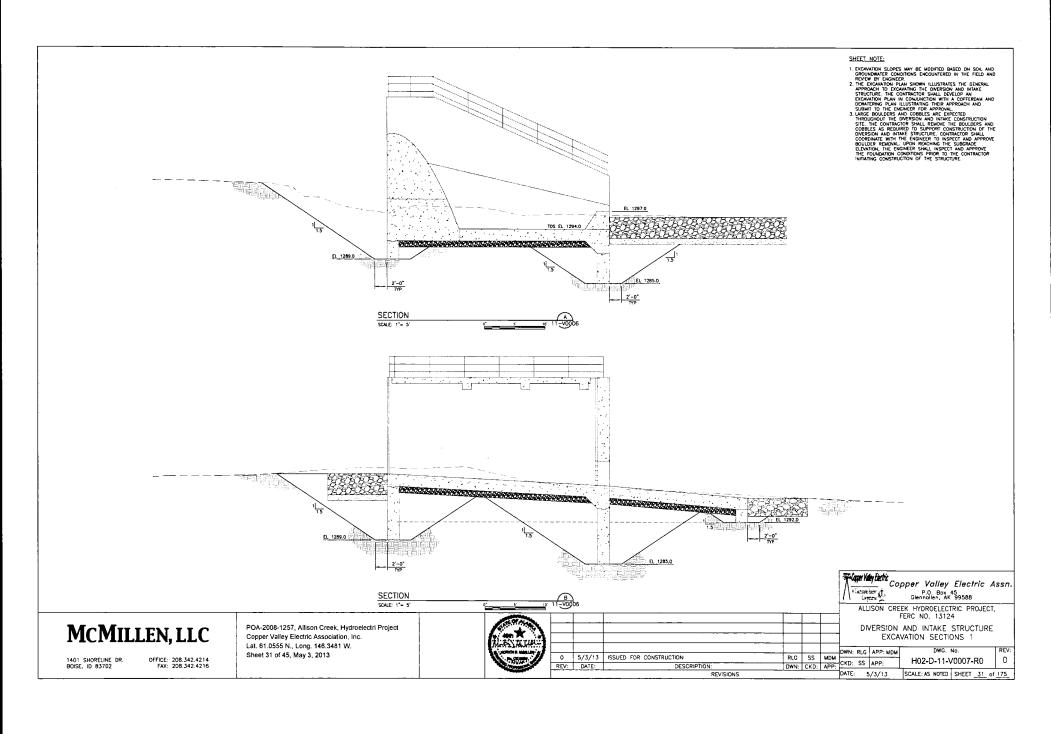
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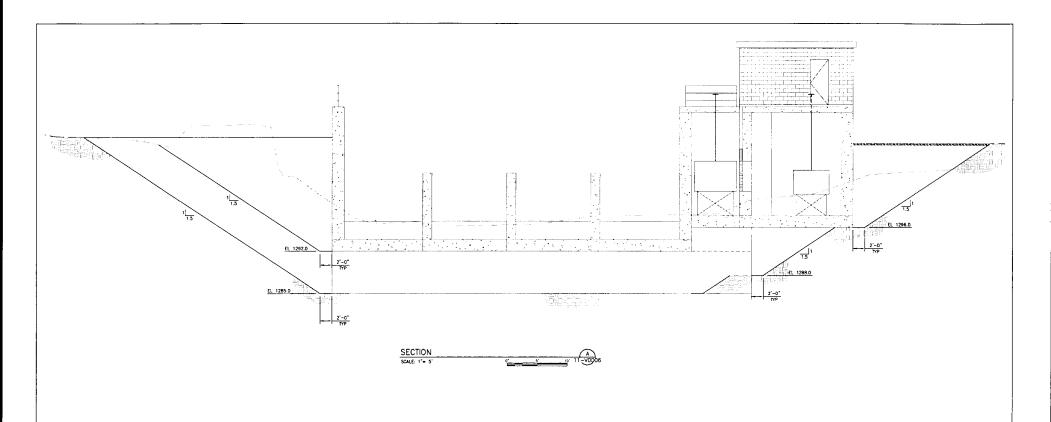
Copper Valley Electric Assn. Alabareties (1) P.O. Box 45 Glennallen, AK 99588

ALLISON CREEK HYDROELECTRIC PROJECT, FERC NO. 13124

DIVERSION AND INTAKE STRUCTURE GRADING PLAN

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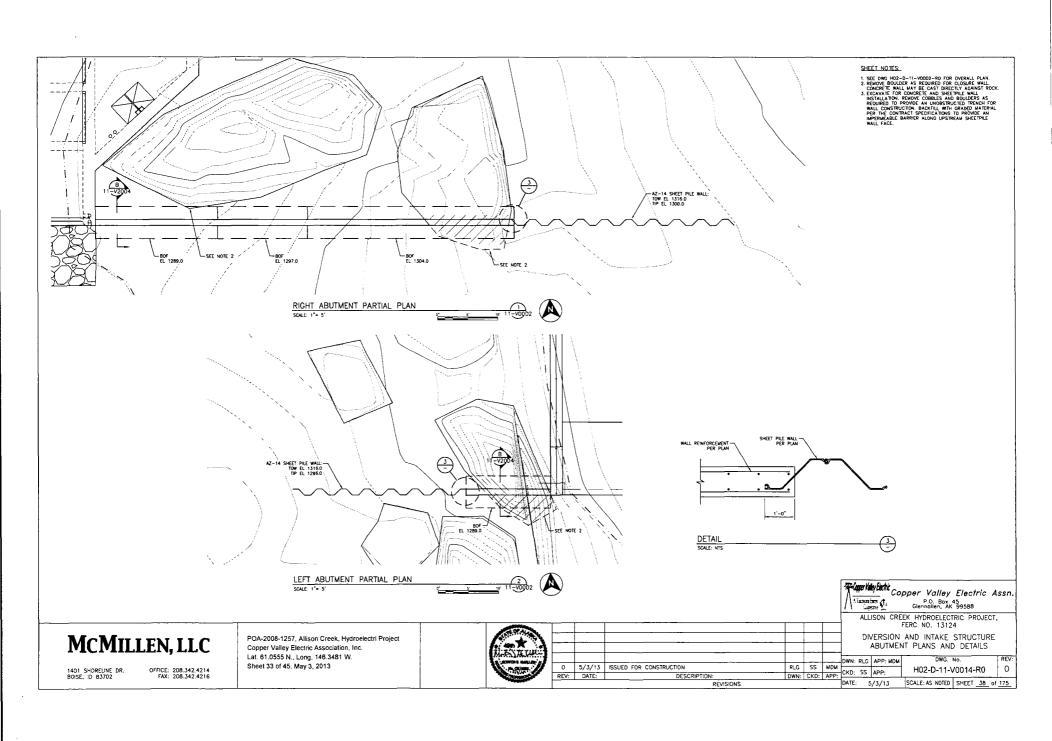
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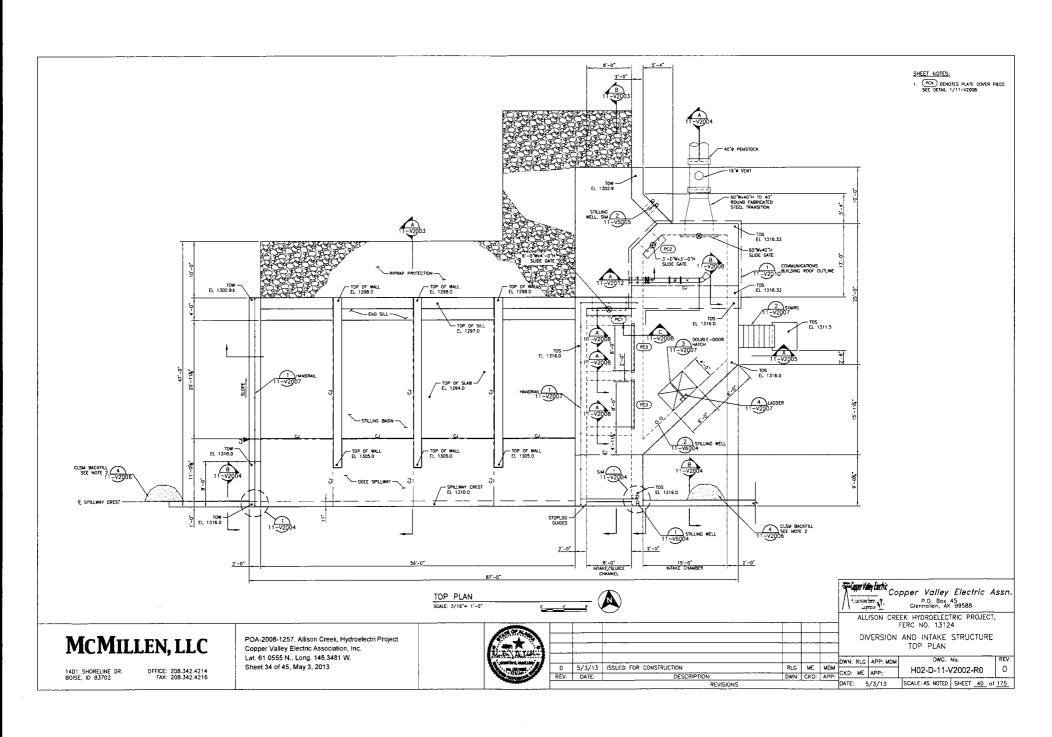
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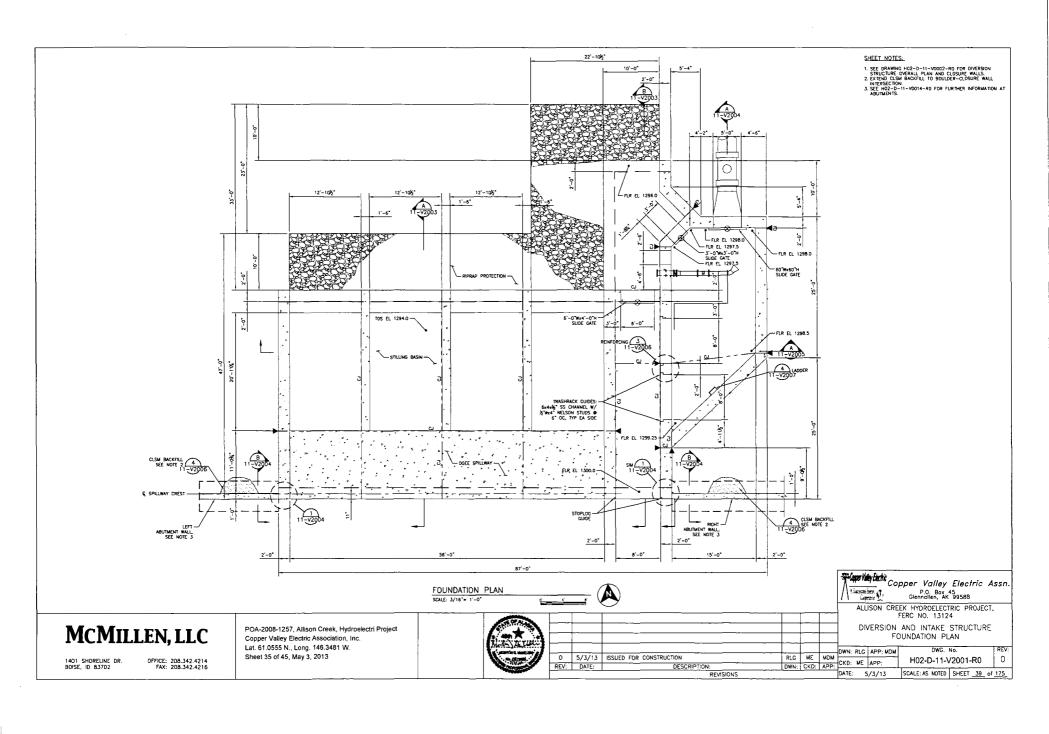
ALLISON CREEK HYDROELECTRIC PROJECT, FERC NO. 13124

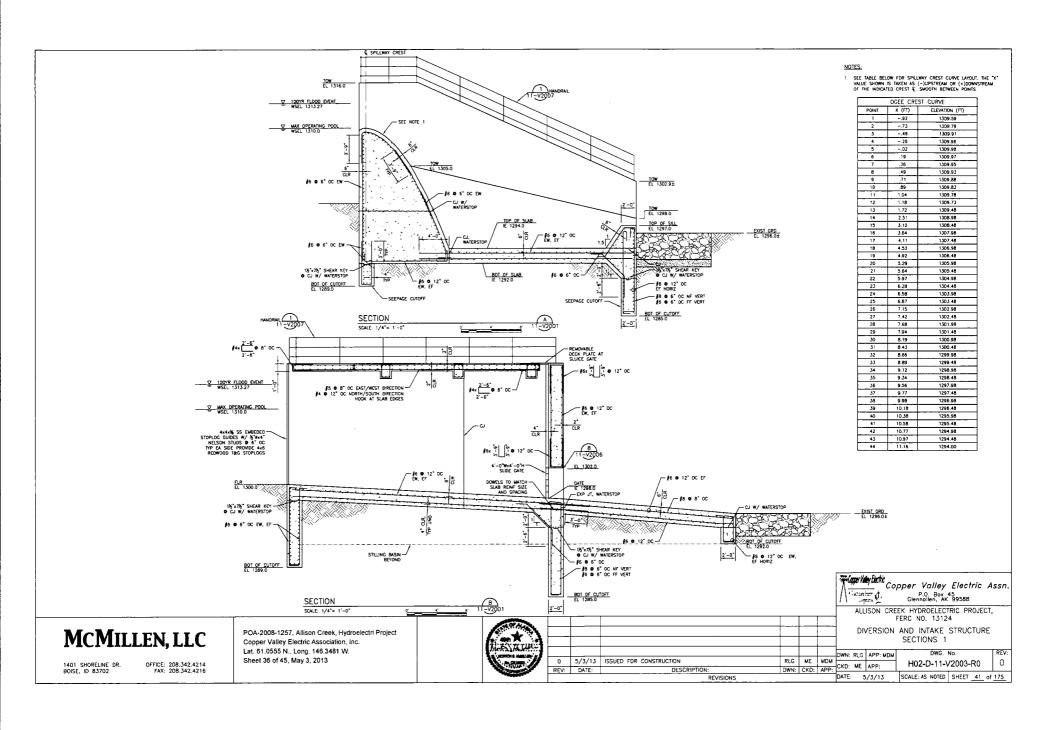
DIVERSION AND INTAKE STRUCTURE EXCAVATION SECTIONS 2

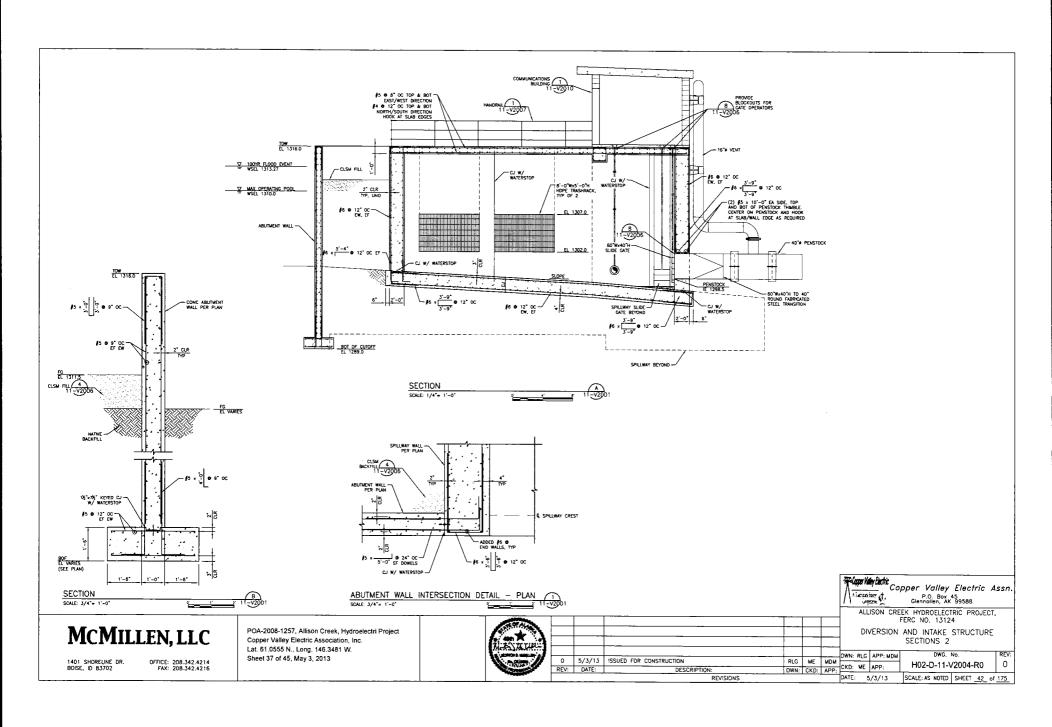
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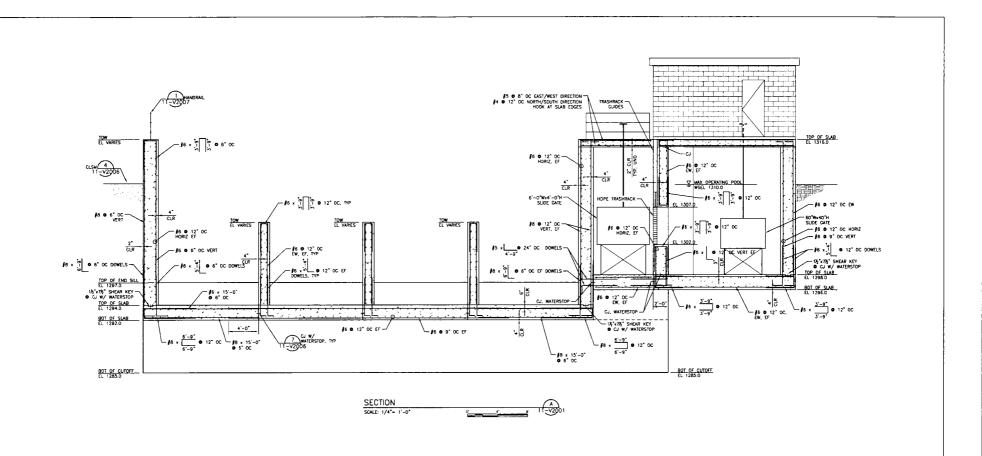












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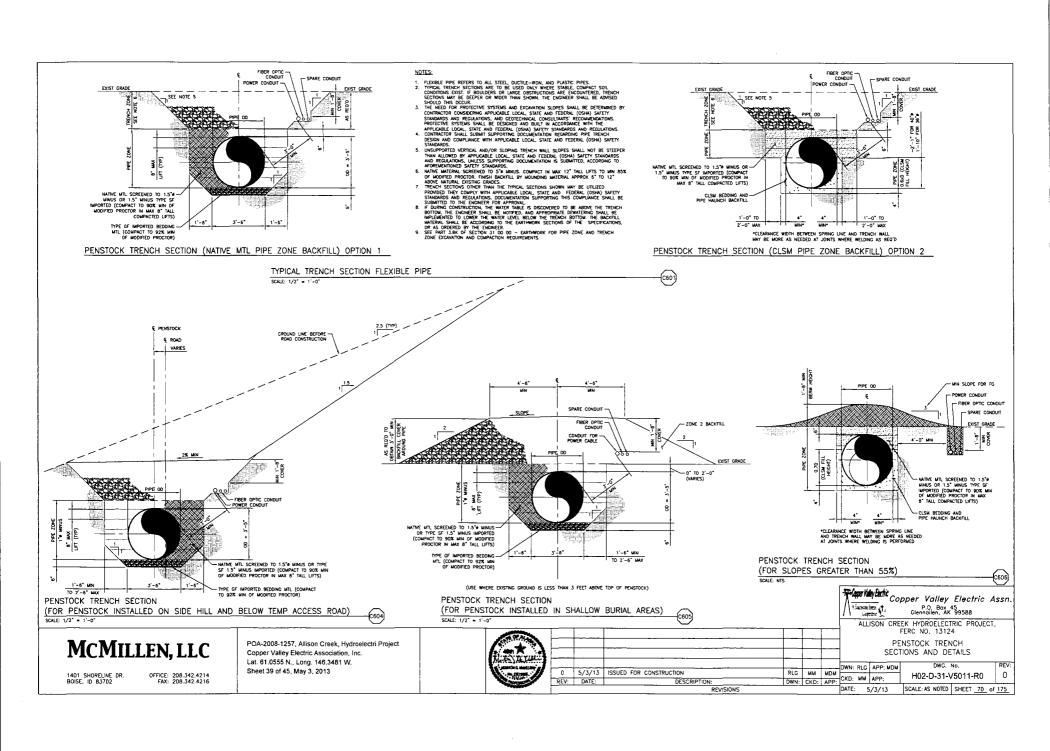
P.O. Box 45 99588

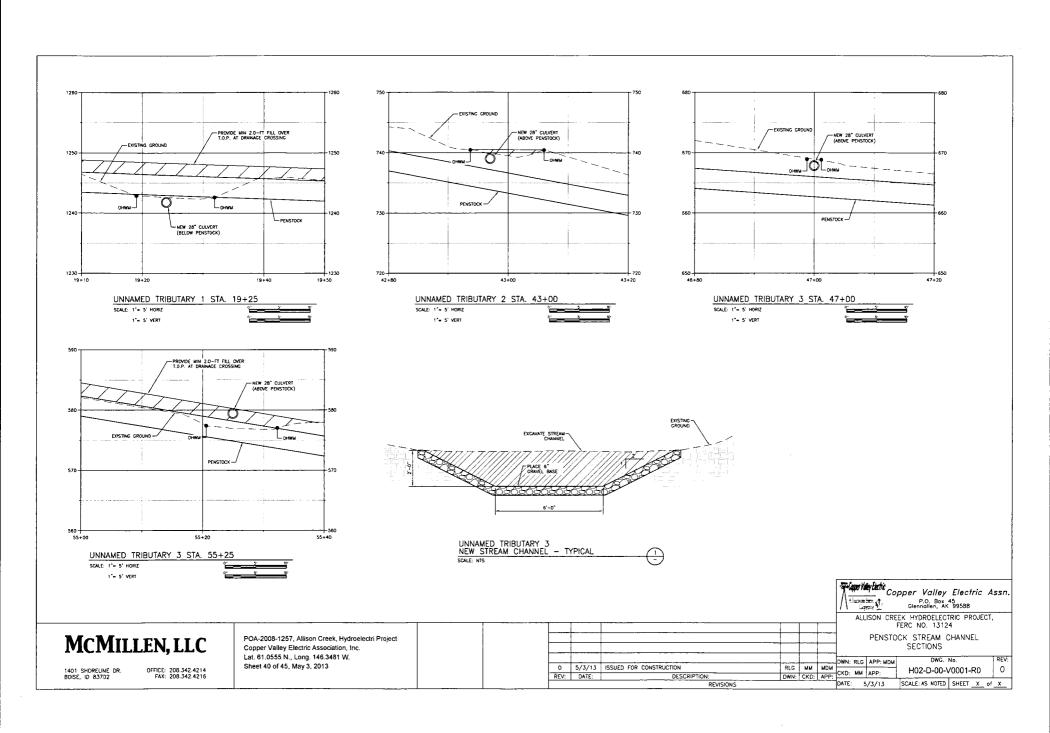
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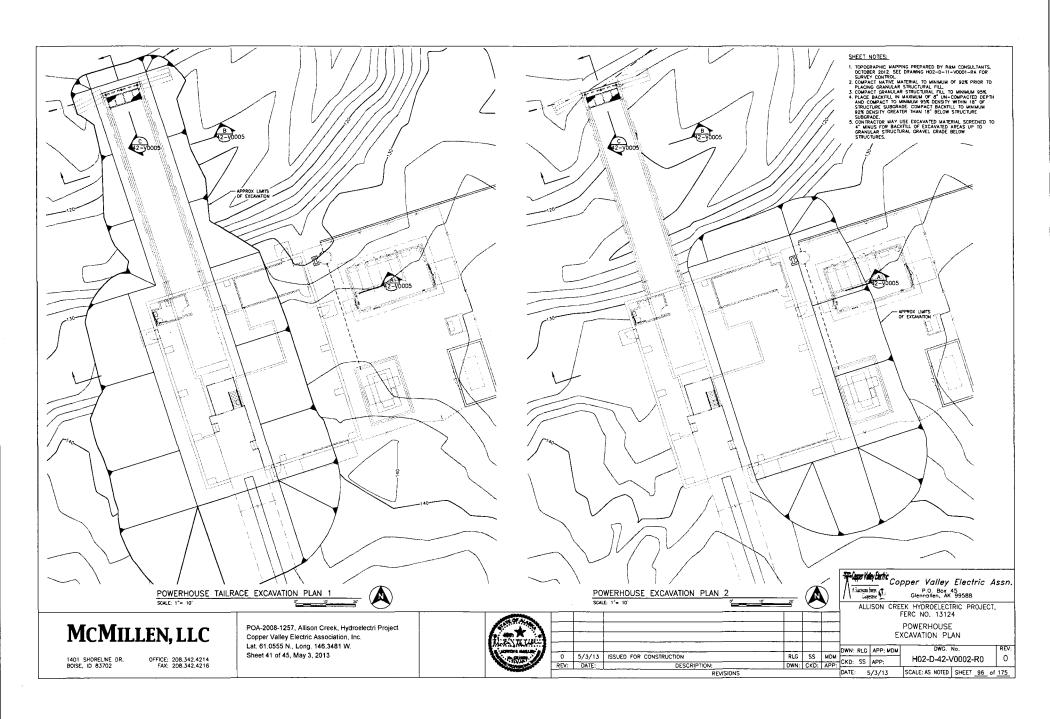
ALLISON CREEK HYDROELECTRIC PROJECT, FERC NO. 13124

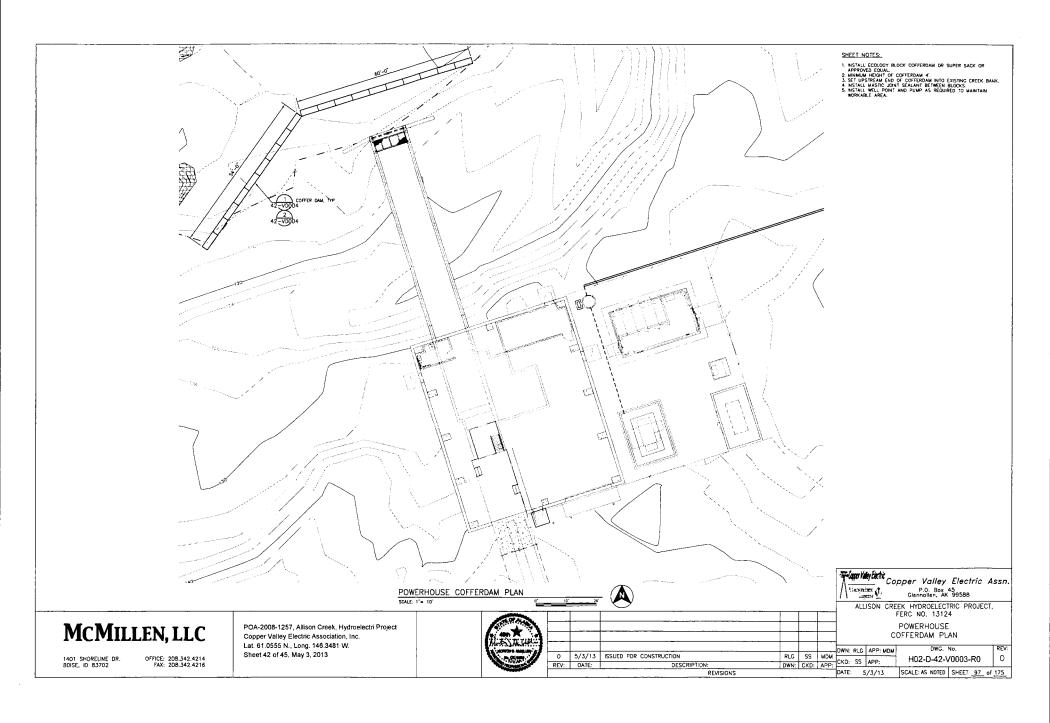
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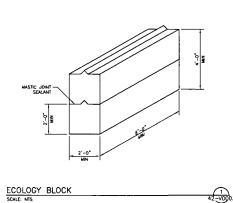
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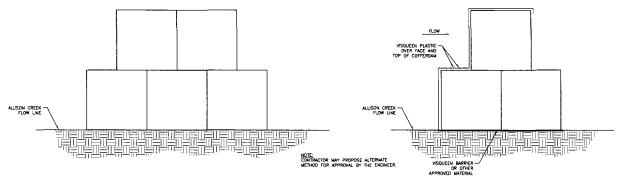












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POA-2008-1257, Allison Creek, Hydroelectri Project Copper Valley Electric Association, Inc. Lat. 61.0555 N., Long. 146.3481 W. Sheet 43 of 45, May 3, 2013



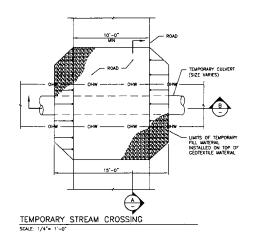
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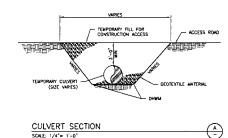
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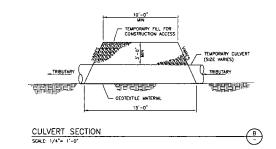
ALLISON CREEK HYDROELECTRIC PROJECT, FERC NO. 13124

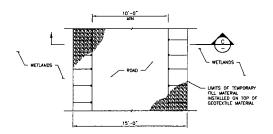
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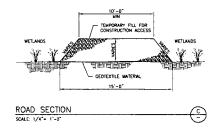
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TEMPORARY WETLAND ACCESS ROAD SCALE: 1/4"= 1'-0"

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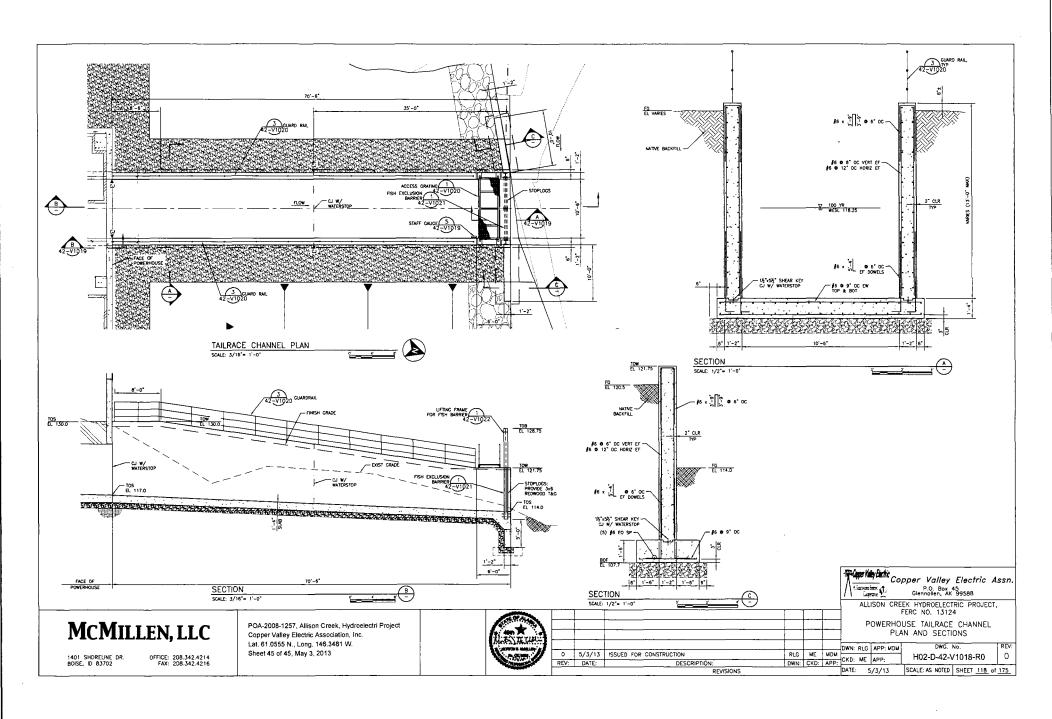
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Copper Valley Electric Assn. P.O. Box 45 Glennollen, AK 99588 ALLISON CREEK HYDROELECTRIC PROJECT, FERC NO. 13124 TRANSMISSION LINE TEMPORARY STREAM

CROSSING AND WETLAND ACCESS

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Allison Creek Hydroelectric Project Supplemental Permit Application Information

Applicant Proposed Mitigation Statement

Copper Valley Electric Association, Inc. (CVEA) is a rural electric cooperative serving Valdez, Glennallen, and the Copper Valley basin. The objective for pursuing the potential development of Allison Creek is to displace fossil fuel generation with additional hydropower generation. CVEA operates an isolated electric system, and the only other electric energy alternative available is from CVEA's existing Solomon Gulch Hydroelectric Project or diesel. Typically, the 12-MW Solomon Gulch project provides about 50% of CVEA's generation. The remaining 50% is generated with fossil fuel from a cogeneration facility or diesel plants in Glennallen and Valdez. The 6.5-MW Allison Creek Project could off-set 11% of generation needed from diesel.

I. Avoidance of Impacts to Waters of the U.S., Including Wetlands

The diversion structure, penstock and powerhouse have been designed to avoid wetlands and streams and remain cost beneficial to the project to the greatest extent practical. The design engineer concluded that there are no other practicable alternatives or arrangements available that have less impact on wetlands and streams. Due to the steep nature of the penstock alignment, there were limited options for the alignment of the penstock and access for construction.

In order to access the intake/diversion location, a temporary construction access is required to accommodate heavy machinery. The design engineer selected a tunnel alternative through the steep bedrock hillside (between stations 65+00 and 76+00) rather than cutting an access road into the hillside. By using the tunnel, potential impacts to streams and wetlands from the construction and constant maintenance of the switchback road are eliminated. The tunnel provides for access during construction and for project maintenance and inspection while also accommodating the penstock which is routed through the tunnel.

The transmission line route was selected to reduce visual impacts to area recreationalists, limit impacts to birds traversing between upland nesting areas and the shoreline, utilize a state-designated utility corridor, and avoid the Trans-Alaska Pipeline that is buried in the vicinity of the transmission line route. Once the general route was selected, the pole locations were established in coordination with the transmission design engineer who modified pole locations and spacing to limit impacts by selecting locations that were outside of wetlands and streams to the greatest extent practicable. This re-route helped to avoid and minimize impacts to wetlands and streams along the alignment as is presented in the permit application.

II. Minimization of Unavoidable Impacts to Waters of the U.S., Including Wetlands

CVEA believes the Allison Creek Hydroelectric Project, as designed, includes all practicable measures to minimize harm to wetlands. Six wetland avoidance and minimization procedures are incorporated in the project design and construction:

 Project design has minimized the fill footprint to the extent practicable in order to construct components of the project,

- Facilities would be consolidated to the smallest extent practical and still provide the intended function and purpose,
- Slopes subject to erosion and disturbed surfaces would be stabilized using Best Management Practices and re-vegetated to minimize stormwater pollution,
- Sedimentation prevention measures would be placed and maintained along the toe of all fill areas adjacent to wetlands or streams to prevent the introduction of sediments. These measures would remain in place until the fill and exposed earthwork are stabilized and revegetated,
- Only clean sand and gravel would be used for fills, and
- Material would be stockpiled primarily in developed areas and/or uplands outside of wetlands or streams.

III. Compensation for Unavoidable Impacts to Waters of the U.S., Including Wetlands

CVEA has designed and licensed a project that not only minimizes potential impacts to waters of the U.S., including wetlands, but also displaces fossil fuel generation with clean, renewable, hydropower generation. For the reasons presented in this Applicant Proposed Mitigation Statement, CVEA is not proposing any compensatory mitigation for project impacts (permanent 0.74 acres/temporary 0.58 acres) to wetlands and streams.

IV. Alternatives Considered

As part of the Federal Energy Regulatory Commission (FERC) licensing process and in accordance with the FERC's National Environmental Protection Act (NEPA) requirements, CVEA developed and considered reasonable alternatives in the siting, layout and design of the hydropower project. The selected run-of-river design alternative is described in the accompanying permit application.

Engineering Alternatives

CVEA considered a total of six alternatives and each of these envisioned the use of Allison Lake as a storage reservoir to achieve a better balance of energy availability during the winter season. The consideration of these alternatives is documented in CVEA's Application for Original License (August 2011) and two related technical reports contained therein: the Allison Lake Hydroelectric Project Final Feasibility Report (May 2010) and Addendum (January 2011). The six alternatives are summarized below.

- Alternative 1: This alternative would have included the creation of an earth embankment at the outlet of Allison Creek to store water, an intake and a diversion tunnel to convey water from Allison Lake to the Solomon Gulch Reservoir to enhance generation at the existing Solomon Gulch powerhouse during low lake conditions. Alternative 1 was removed from further study due to high cost of the proposed tunnel and uncertainty regarding pathogens transferred to Solomon Gulch Reservoir from Allison Lake and the potential cost of treatment to continue to provide water to the Solomon Gulch Hatchery.
- <u>Alternative 2:</u> This alternative would have included an independent development of Allison Lake consisting of an earth embankment at the outlet of Allison Creek to store water, an intake, tunnel, power conduit, and a new powerhouse near tidewater on Allison Creek. Alternative 2 was removed from further study due to high cost of the proposed tunnel.
- Alternative 3: This alternative was considered to convey water to an independent 4 MW powerhouse near tidewater on Allison Creek by means of an earth embankment at the outlet of

Allison Creek to store water, a surface/buried penstock. Four configurations within this alternative were investigated:

- Alternative 3a siphon, submerged intake and 2,200 foot long buried penstock.
- Alternative 3b a 3,000 foot long micro-tunnel with submerged intake and 30-foot high rock fill dam.
- Alternative 3c a 70-ft high rock fill dam at the outlet of Allison Lake and 2,200 foot long buried penstock.
- Alternative 3d a 30-foot high rock fill dam at the outlet of Allison Lake and 2,200 foot long buried penstock with a 6 MW powerhouse.

Of the four arrangements for Alternative 3, CVEA initially concluded that Alternative 3c provided the lowest cost of power. However, by 2010 all Alternative 3 considerations, including Alternative 3c were removed from further consideration due to concerns regarding embankment cost, high potential for cost overruns during construction, foundation conditions for the embankment dam with regard to seepage and liquefaction, avalanche hazard, and project reliability during winter season due to a lack of access capability to major features at Allison Lake.

Project studies and analyses, as presented in the Final Feasibility Study Report (2010) and Addendum (2011), demonstrated that each of the alternatives were technically and environmentally feasible. However, the studies also revealed that each alternative included significant challenges potentially affecting long term economics and/or operational reliability. Based on design and economic considerations and findings, CVEA removed the reservoir storage alternatives from further consideration and adopted the run-of-river hydroelectric generation project utilizing a diversion structure and intake in Allison Creek, instead of an embankment and intake at Allison Lake. This run-of-river arrangement as described in the permit application was determined to be the preferred alternative to develop the hydropower potential of the Allison Creek drainage basin. It also proved to have least amount of environmental impacts to the environment and water resources since a large dam and reservoir would not be constructed.

Environmental Alternatives

Upon selection of the run-of-river configuration for the proposed project, CVEA initiated a rigorous study program to assess environmental impacts. The resulting Application for Original License (August 2011) details the results of those studies and the additional environmental protection, mitigation and enhancement (PM&E) measures CVEA proposed to accompany the design of the hydroelectric project.

FERC's NEPA process evaluated the run-of-river project and proposed PM&E measures. The Final Environmental Assessment (EA) was issued by FERC on June 21, 2013 presenting FERC's environmental analysis of the alternatives considered: the applicant-proposed alternative, the staff-recommended alternative, and the no-action alternative. These alternatives are summarized below and presented in greater detail in the June 2013 Final EA.

No Action Alternative: The no-action alternative is license denial. Under the no-action alternative, the project would not be built and environmental resources in the project area would not be affected. Economic and environmental benefits associated with the reduction of fossil generation would not be realized. Environmental consequences would include continuing use of diesel fuel to provide

an equal amount of electric power to CVEA's members with the ensuing environmental impacts associated with storage and handling of liquid fuel; contribution to climate change due to greenhouse gas emissions and related adverse effects on public health; and contribution to ocean acidification. Continued use of diesel generation also includes increased future energy generation costs associated with direct costs of monitoring and compliance, the fluctuation in the cost of diesel fuel, and indirect costs to public health.

- <u>Applicant-Proposed Alternative</u>: CVEA proposed the Allison Creek Hydroelectric Project as described in the permit application accompanied by a number of measures to minimize potential impacts on the aquatic ecosystem, including:
 - Operate the project in run-of-river mode
 - o Release a minimum flow of 2 cubic feet per second (cfs) at the diversion structure into the bypassed reach of Allison Creek at all times when the project is operating
 - Maintain a minimum flow of 10 cfs in Reach 3 of the bypassed reach (6,500 feet downstream from the diversion) from June 16 through October 31, and 8 cfs from November 1 through June 15 if the project is operating
 - o Provide a ramping rate of 20 cfs per hour in Reach 3 during project startup and shutdown
 - o Minimize the footprint of the area to be used to place fill material
 - o Consolidate project facilities to a small area of impact
 - o Implement an Erosion and Sediment Control Plan (ESCP) to protect water quality by using best management practices (BMPs) for controlling erosion; and develop and include in the ESCP: a Storm Water Pollution Prevention Plan, a Construction Water Quality Monitoring Plan, and a Blasting Plan
 - O Develop and implement Phase 1 of a Biotic Monitoring Plan that includes an Environmental Compliance Monitoring Plan (Environmental Monitoring Plan) and provides for the presence of a qualified Environmental Compliance Monitor (ECM) onsite during all construction phases to monitor turbidity upstream and downstream of the construction during instream work
 - o Implement measures to protect wetlands including: revegetating slopes and disturbed surfaces to minimize stormwater pollution, planning and maintaining sediment prevention measures along the toe of all fill areas adjacent to wetlands or waters, preventing sediments from entering fill areas adjacent to wetlands or waters, using only clean sand and gravel for fill, and stockpiling material in developed areas and/or uplands (see also Section II above)
 - o Install and maintain stream gages below the diversion and in Reach 3, and collect and analyze data from these gages to document compliance with minimum flow releases
 - Develop and implement Phase 2 of the Biotic Monitoring Plan to monitor water temperature alterations, fish stranding, and habitat connectivity in the bypassed reach of Allison Creek
- <u>Staff-Recommended Alternative</u>: Under the staff alternative, the project would include Copper Valley's proposed measures, as outlined above. In addition, staff recommends the following modifications and additional measures to minimize potential impacts on the aquatic ecosystem:
 - Develop an Operation Compliance Monitoring Plan

- Provide failsafe provisions to ensure that continuous instream flows are provided to Allison
 Creek in the bypassed reach
- Develop a final tailrace design in consultation with the agencies to reduce or eliminate fish attraction to the project tailrace
- o Notify the Commission, ADFG, and FWS within 10 days of an event not in compliance with any license that may be issued that would affect fish and/or wildlife
- Develop a plan to discourage fishing, hunting, and trapping in the project area by project personnel