



Your Community Energy Partner

September 25, 2018

VIA ELECTRONIC FILING

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

**Re: Jackson Hydroelectric Project, FERC No. 2157
Operation Compliance Monitoring Plan Annual Report
License Article 407**

Dear Secretary Bose:

Enclosed is Public Utility District No. 1 of Snohomish County's Operation Compliance Monitoring Plan Annual Report for the Water Year July 2017 – June 2018 pursuant to License Article 407 for the Jackson Hydroelectric Project.

If you have any questions on the report, please contact Keith Binkley, Natural Resources Manager, at (425) 783-1769 or KMBinkley@snopud.com.

Sincerely,

/s/ Tom DeBoer

Tom DeBoer
Assistant General Manager of Generation, Power, Rates and Transmission Management
TADeBoer@snopud.com
(425) 783-1825

Enclosed: OCMP Annual Report

cc: ARC
Keith Binkley, District

Henry M. Jackson Hydroelectric Project
(FERC No. 2157)

Operation Compliance Monitoring Plan
(License Article 407)

**Annual Report for Water Year
July 2017 – June 2018**



Prepared By:



Everett, WA

September 2018

Final – This document has been prepared for the District. It has been peer-reviewed by the District for accuracy and formatting based on information known at the time of its preparation and with that understanding is considered complete by the District. The document may be cited as:

Public Utility District No. 1 of Snohomish County (District). 2018. License Article 407: Operation Compliance Monitoring Plan Annual Report for Water Year July 2017 through June 2018, for the Henry M. Jackson Hydroelectric Project, FERC No. 2157. September 2018.

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Acronyms and Abbreviations

A-LA	Aquatic License Article
ARC	Aquatic Resource Committee
cfs	cubic feet per second
District	Public Utility District No. 1 of Snohomish County
FERC	Federal Energy Regulatory Commission
MW	megawatt
OCMP	Operation Compliance Monitoring Plan
PF Plan	Process Flow Plan
Project	Henry M. Jackson Hydroelectric Project, FERC No. 2157
RM	River Mile
SCADA	Supervisory Control and Data Acquisition
USGS	United States Geological Survey
WY	Water year

1. INTRODUCTION

Public Utility District No. 1 of Snohomish County (the District) received from the Federal Energy Regulatory Commission (FERC) a new license for the existing 111.8-megawatt (MW) Henry M. Jackson Hydroelectric Project (FERC No. 2157) (Project) on September 2, 2011. The District filed with the FERC the Operation Compliance Monitoring Plan (OCMP) in response to License Article 407. The FERC approved the OCMP on April 10, 2012. Per Section 9 of the OCMP, the District is to file an Annual Report by November 1 of each year, which documents the following for the previous water year (July through June):

- (a) the dates, duration, and quantities of the process flow released in accordance with the Process Flow Plan (PF Plan) required by Article 416;
- (b) Spada Lake Reservoir daily water surface elevations; and
- (c) if deviations from the targeted State 3 water surface elevations occurred, the reasons for the deviations and any proposals for corrective actions to avoid future occurrences, as appropriate.

This OCMP Annual Report covers activities for water year (WY) July 2017 – June 2018.

A copy of the draft report was provided to National Marine Fisheries Service, U.S. Forest Service, U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, Washington Department of Ecology, Tulalip Tribes, Snohomish County, City of Everett, City of Sultan, and American Whitewater (collectively known as the Aquatic Resource Committee or ARC) for a 30-day review and comment period.

Spada Lake Reservoir data in tabular format are included in Appendix 1. Letters regarding the reservoir elevation deviation are included as Appendix 2. Consultation documentation with the ARC regarding the draft report is included in Appendix 3; no comments were received regarding the draft report.

2. PROCESS FLOWS

The District provided process flow events pursuant to the Process Flow Plan (PF Plan) on four occasions during the July 2017 – June 2018 timeframe to serve multiple habitat benefits. These included, in chronological order: 1) a flushing of surficial fine sediment from the streambed and an upmigration flow for spawning salmonids in September 2017, 2) a maintenance event in February 2018, 3) a nighttime juvenile outmigration and flushing event in April 2018, and 4) a daytime juvenile outmigration event in May 2018. The three reaches of the Sultan River are depicted in Figure 1. The process flow events for the July 2017 – June 2018 timeframe are summarized, by these reaches, in Table 1. The District followed each process flow event with License-required downramping; downramping is evident on the descending limb of the hydrograph associated with each process flow event as shown in Figures 2 through 11. The full Process Flow Log (dating back to license issuance in September 2011) is posted to the web at: <http://www.snopud.com/PowerSupply/hydro/jhp/jhplicense/fishery.ashx?p=2069>.

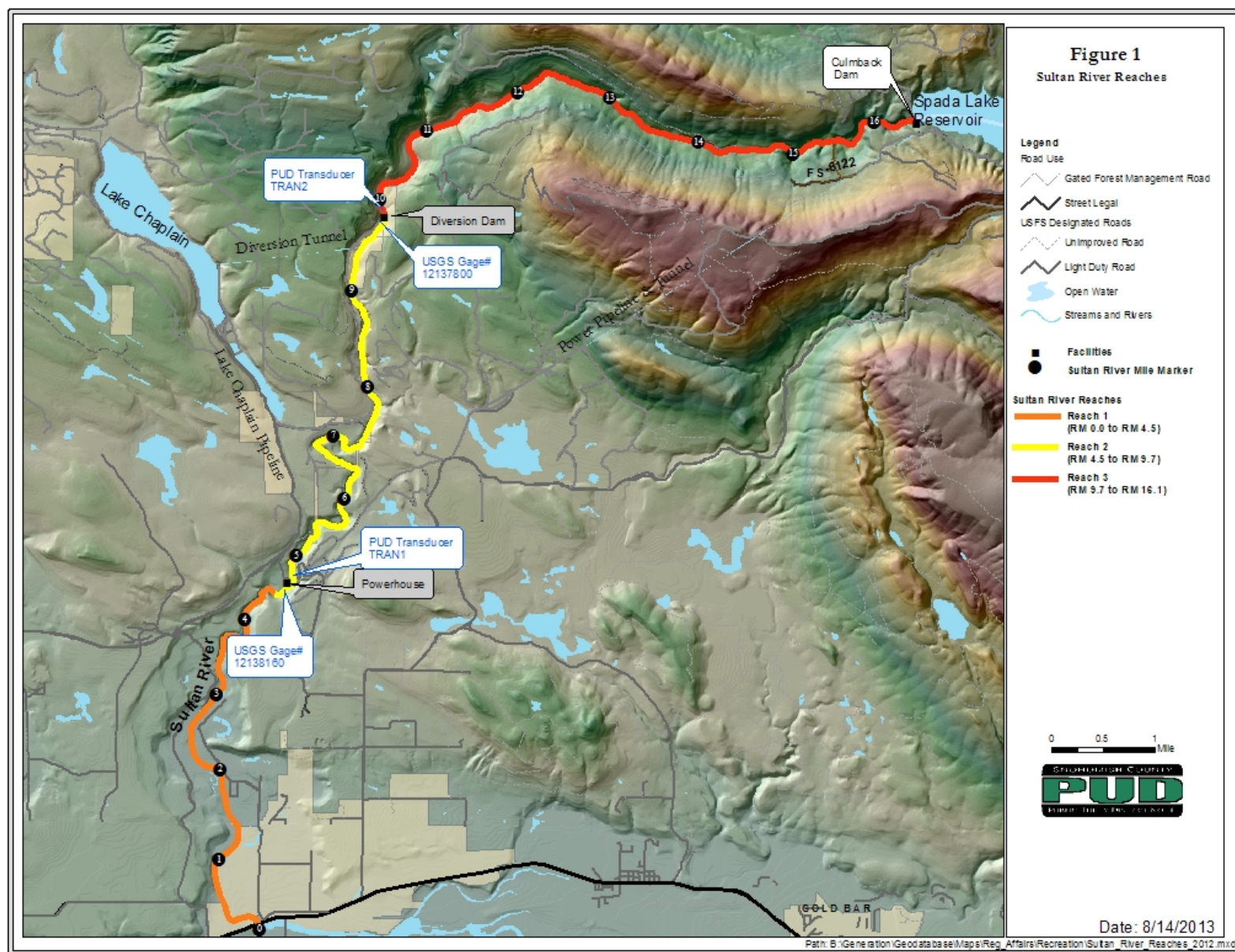


Figure 1. Sultan River reaches.

Table 1. Process Flow Log, July 2017 – June 2018.

Date ¹	Time ²	Magnitude ³ (cfs)	Duration ⁴ (hours)	Accretion ⁵ (cfs)	Notes ⁶	Counts as PF Type ⁷
9/02/17	10:15 to 17:00	R3 – 713 (average), range: 304 to 948	> 6 hours greater than 300 cfs, > 3 hours greater than 600 cfs.	Accretion negligible (Average Spada Total Rain (June- August): 15.16" 2017 Totals: 6.42"	Reference Figure 2	FL, U
9/02/2017	11:45 to 21:15	R2 – 786 (average), range 406 to 1,123	> 6 hours greater than 400 cfs, > 3 hours greater than 700 cfs.	Estimated at 50 cfs.	Reference Figure 3	FL, U
9/02/2017	9/02/17 11:45 to 9/03/17 15:15	R1 – 1,189 (average), range 802 to 1,620	> 6 hours greater than 1,500 cfs, > 6 hours greater than 800 cfs.	Estimated at 50 cfs.	Reference Figure 4	FL, U
2/04- 05/2018	2/04/18 17:00 to 2/05/18 17:45	R1 – 4,394 (average), range 4,130 to 4,650	24.75 hours greater than 4,100 cfs	Variable, estimated between 600 and 1,100 cfs	Reference Figure 5	M
4/5/2018 – 4/6/2018	21:00 to 05:30	R3 – 512 (average), range 492 to 526	8.5 hours greater than 400 cfs	Estimated at 148 cfs	Reference Figure 6	FL, O
4/5/2018 – 4/6/2018	21:00 to 05:30	R2 – 699 (average), range 670 to 730	8.5 hours greater than 500 cfs	Estimated at 100 cfs	Reference Figure 7	FL, O
4/5/2018 – 4/6/2018	21:00 to 05:30	R1 – 2,079 (average), range 2,050 to 2,110	8.5 hours greater than 1,500 cfs	Cumulative accretion estimated at 248 cfs	Reference Figure 8	FL, O
5/19/2018	11:30 to 19:00	R1 – 1,118 (average), range 805 to 1,330	7.5 hours greater than 800 cfs	Cumulative accretion 57 cfs	Reference Figure 9	O

¹ Start Date of Event (MM/DD/YYYY)² Start Time to End Time³ Magnitude of the Event for Each Compliance Location (R1-Reach 1, R2-Reach 2, R3-Reach 3)⁴ Duration of Event⁵ Portion of Event Attributed to Accretion Flows⁶ Notes of Day's Event, Sequencing with Other Flow Events/Maintenance⁷ Channel Forming (CF), Channel Maintenance (CM), Flushing (FL), Outmigration (O), Upmigration (U) as defined in the PF Plan

5/19/2018	11:30 to 22:00	R2 – 774 (average), range 403 to 1,099	10.5 hours greater than 400 cfs	Cumulative accretion 57 cfs	Reference Figure 10	O
5/19/2018 – 5/20/2018	10:00 to 0:00	R3 – 642 (average), range 210 to 1,060	14 hours greater than 200 cfs	Estimated at 29 cfs	Reference Figure 11	O

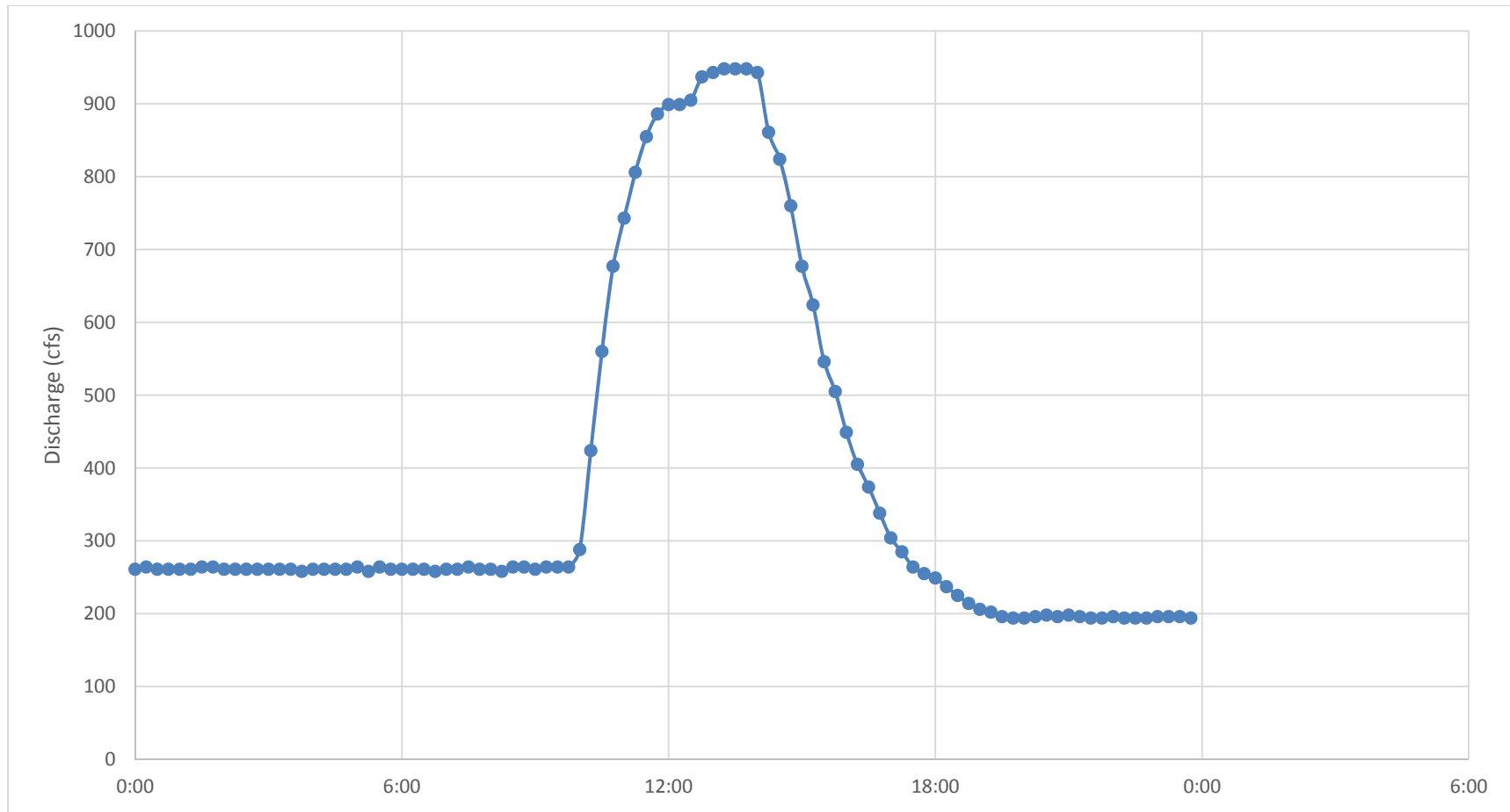


Figure 2. Sultan River immediately upstream of Diversion Dam at RM 9.8 – 9/02/2017.

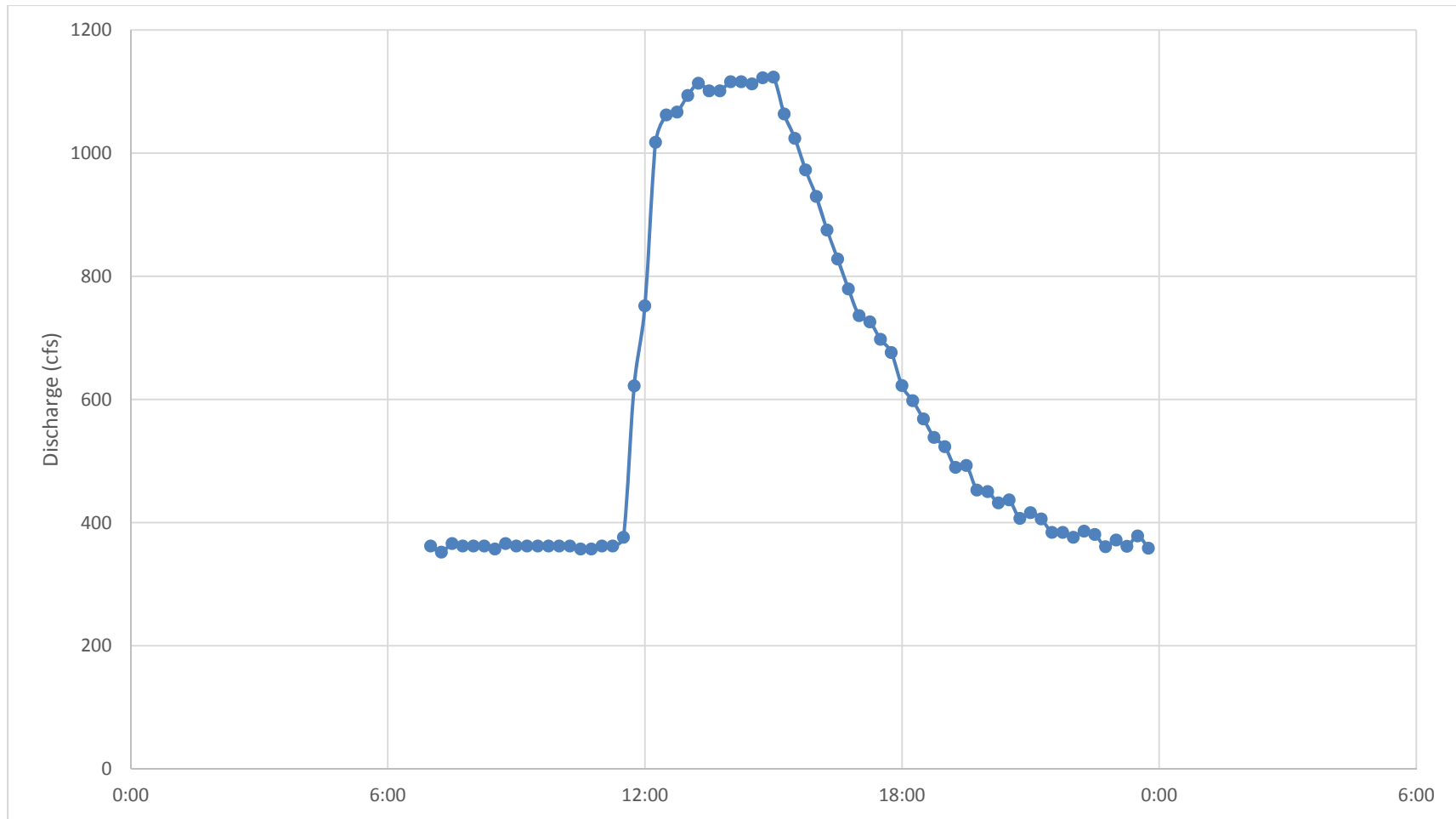


Figure 3. Sultan River immediately upstream of Powerhouse at RM 4.7 – 9/02/2017.

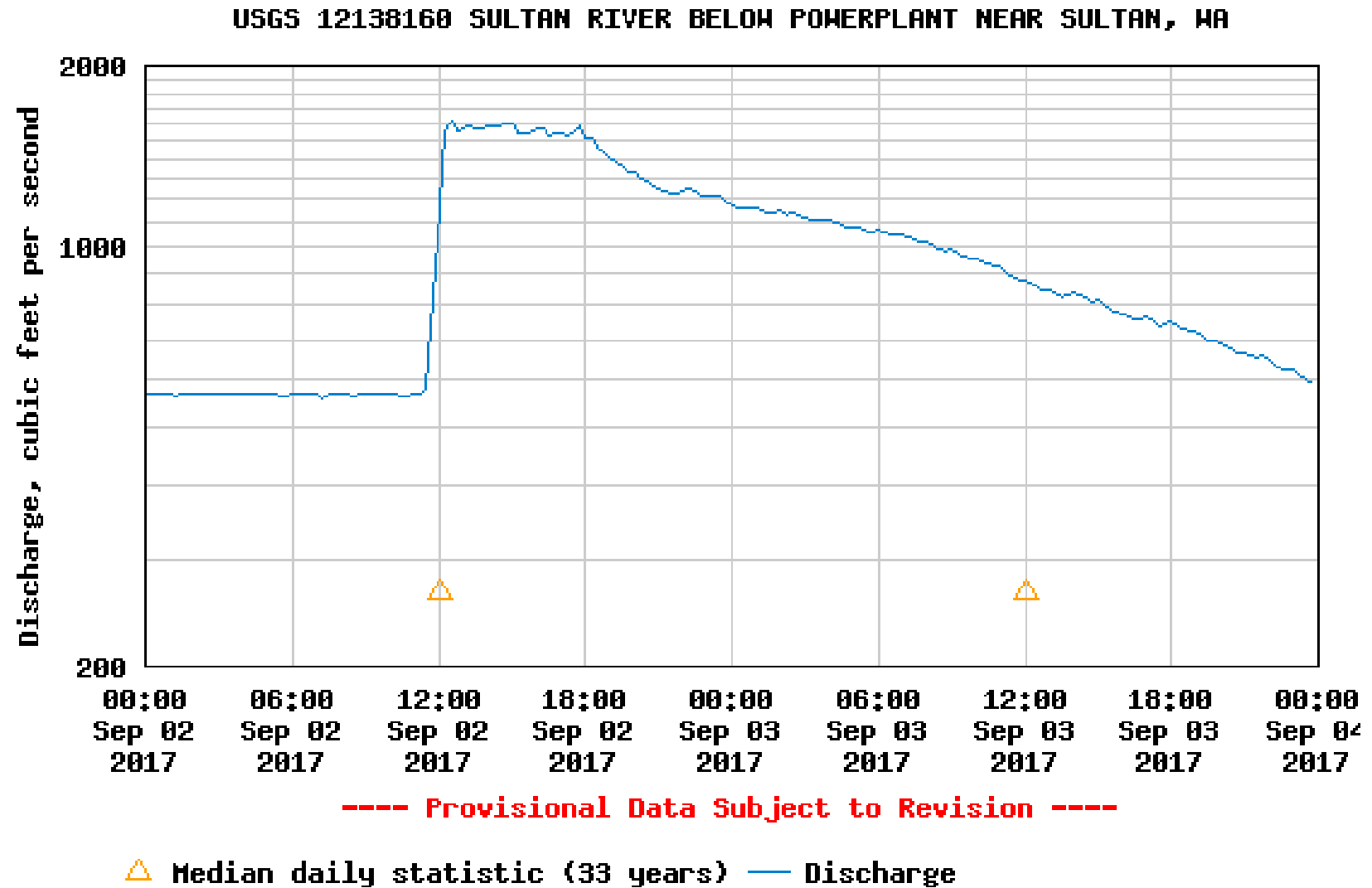


Figure 4. Sultan River immediately downstream of Powerhouse – 9/02/2017.

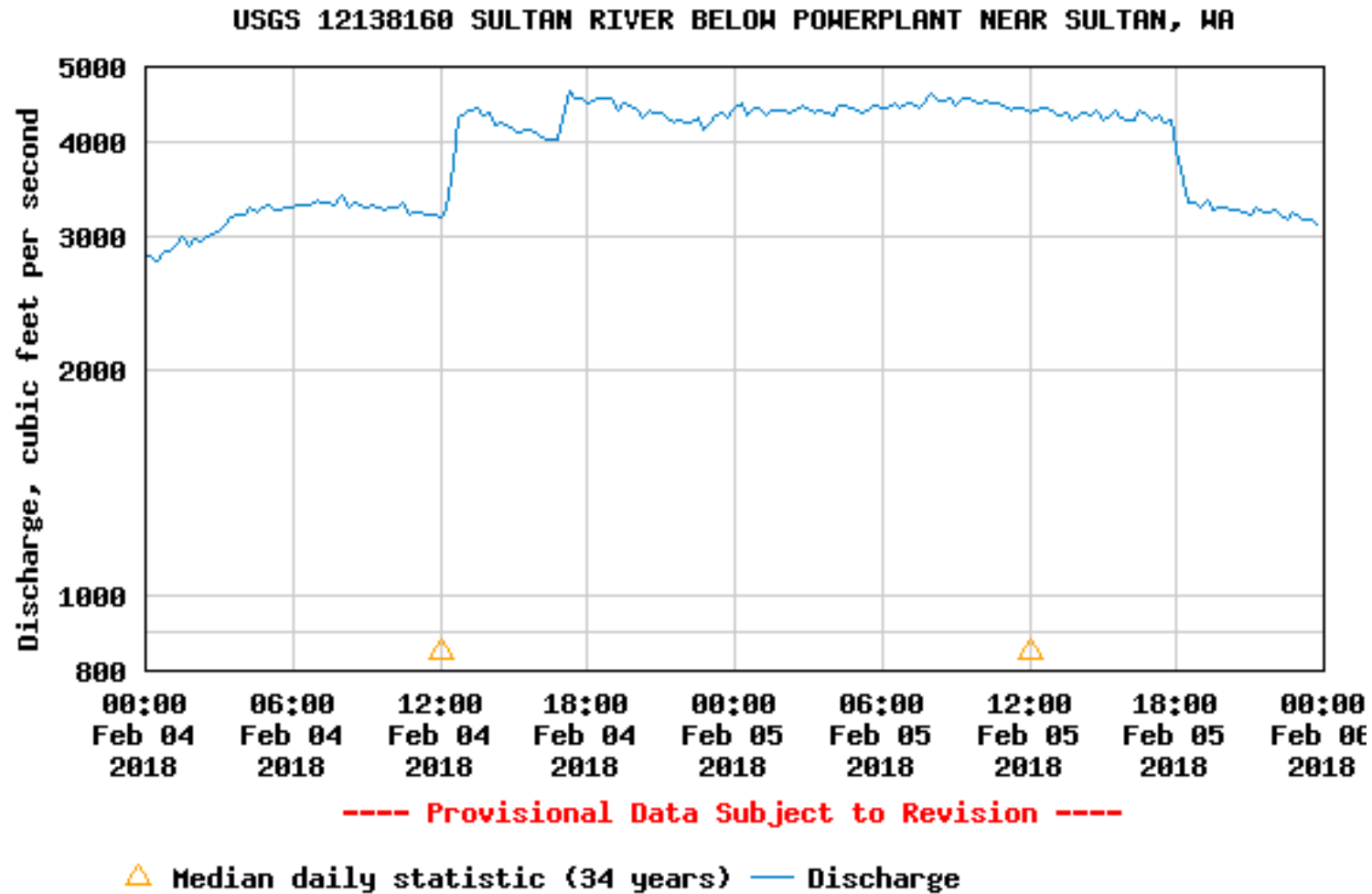


Figure 5. Sultan River immediately downstream of Powerhouse – 2/04-05/2018.

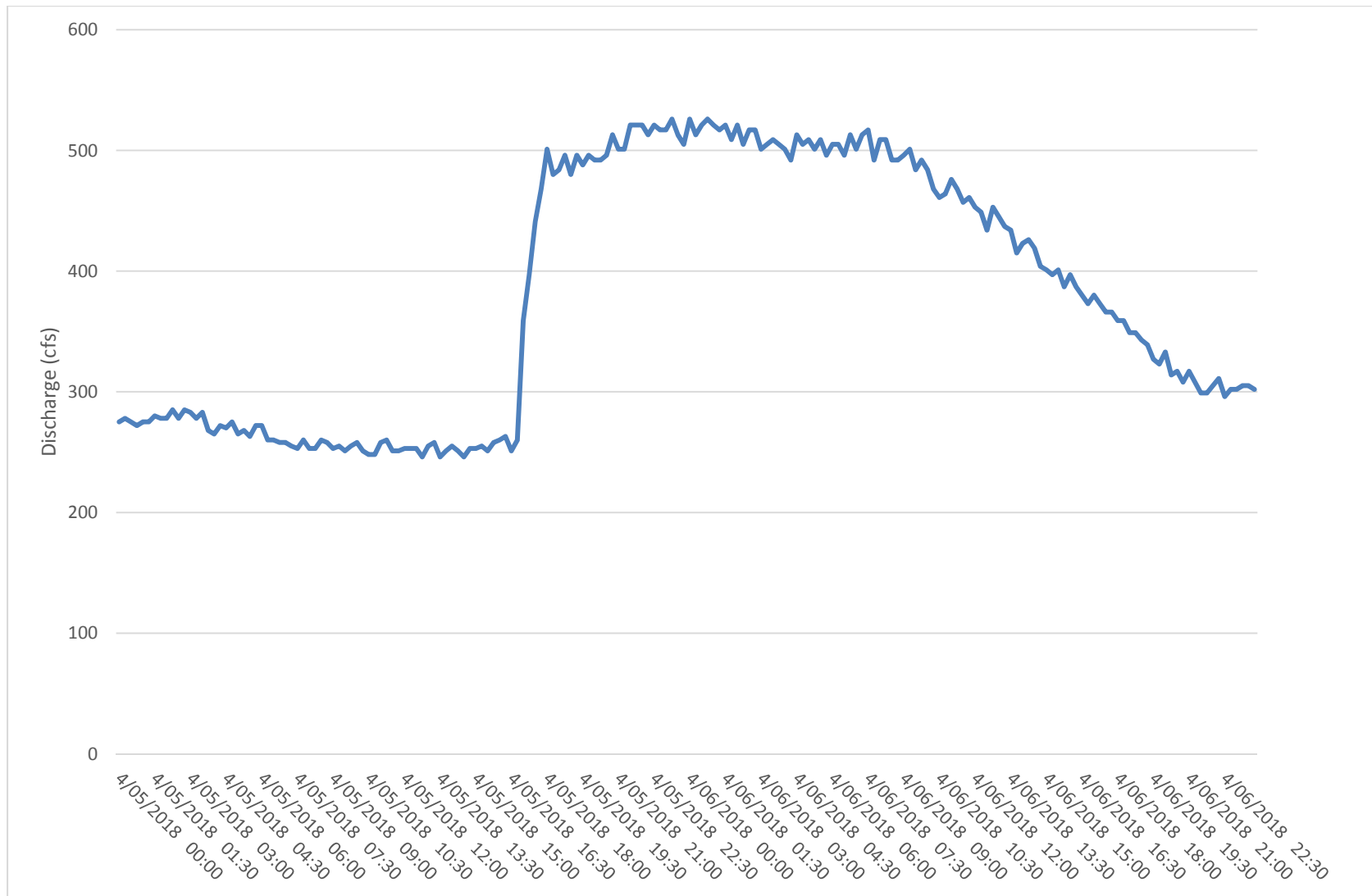


Figure 6. Sultan River immediately upstream of Diversion Dam – 4/05-06-/2018.

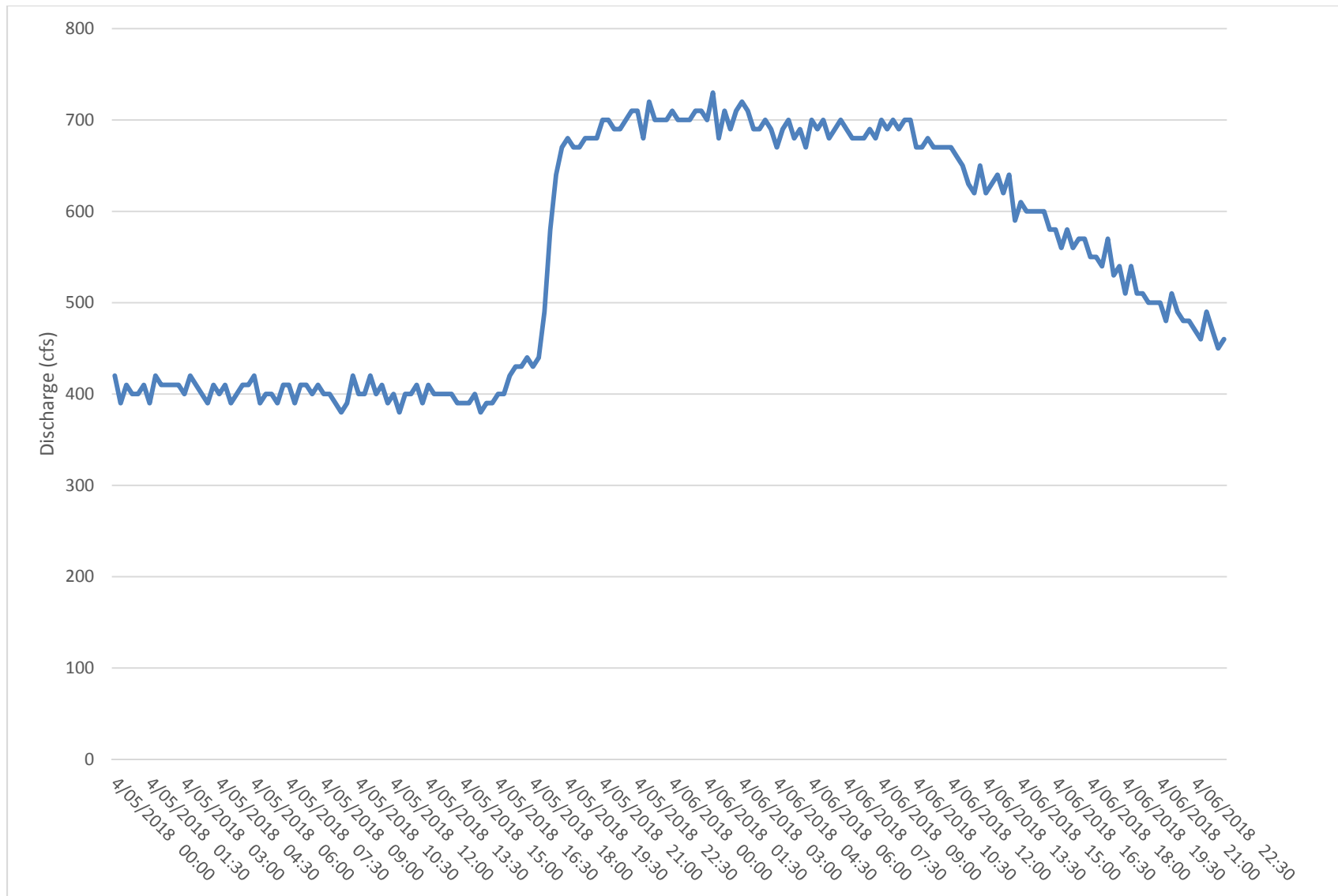


Figure 7. Sultan River immediately upstream of Powerhouse – 4/05-06/2018.

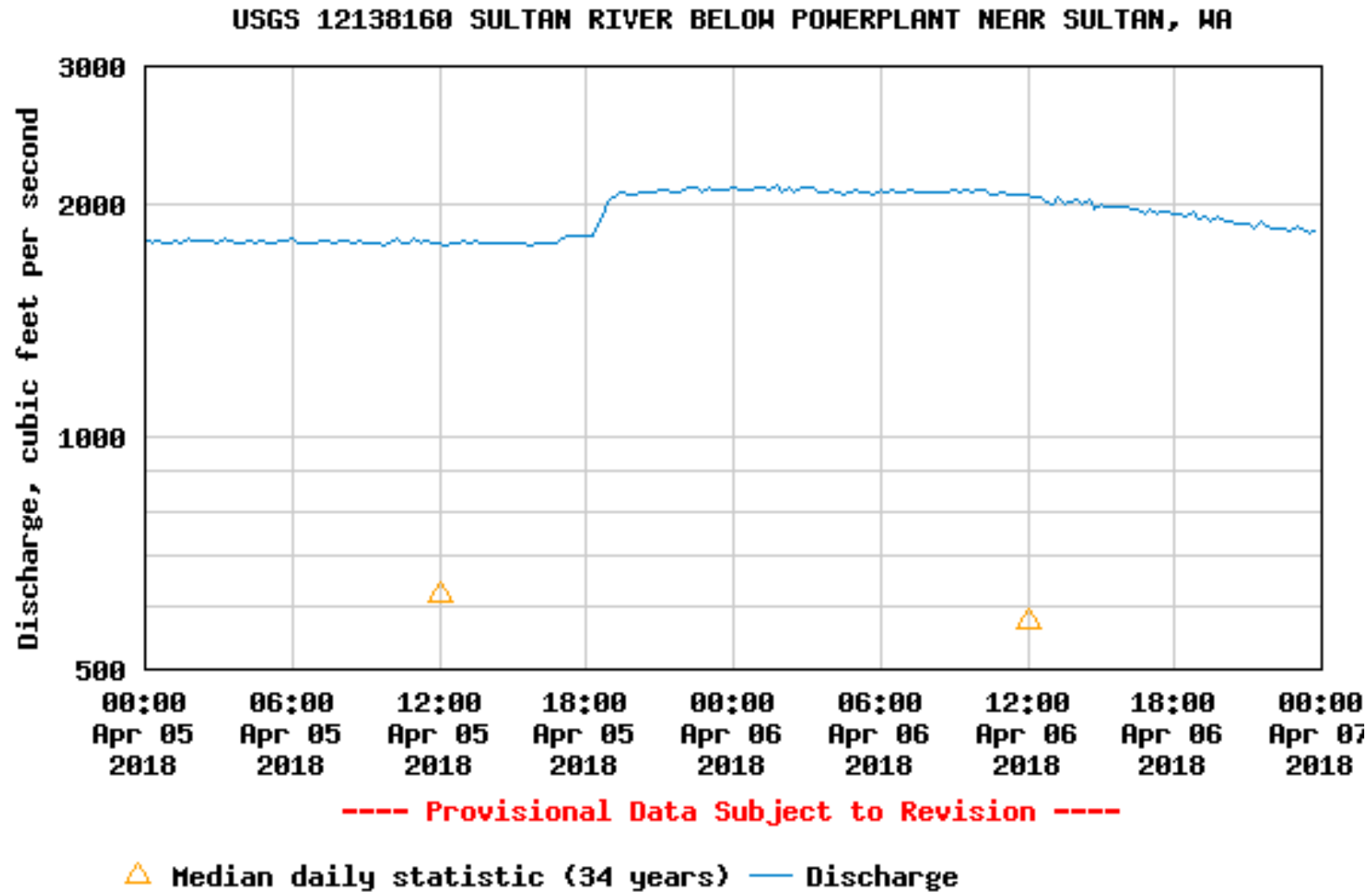


Figure 8. Sultan River immediately downstream of Powerhouse – 4/05-06/2018.

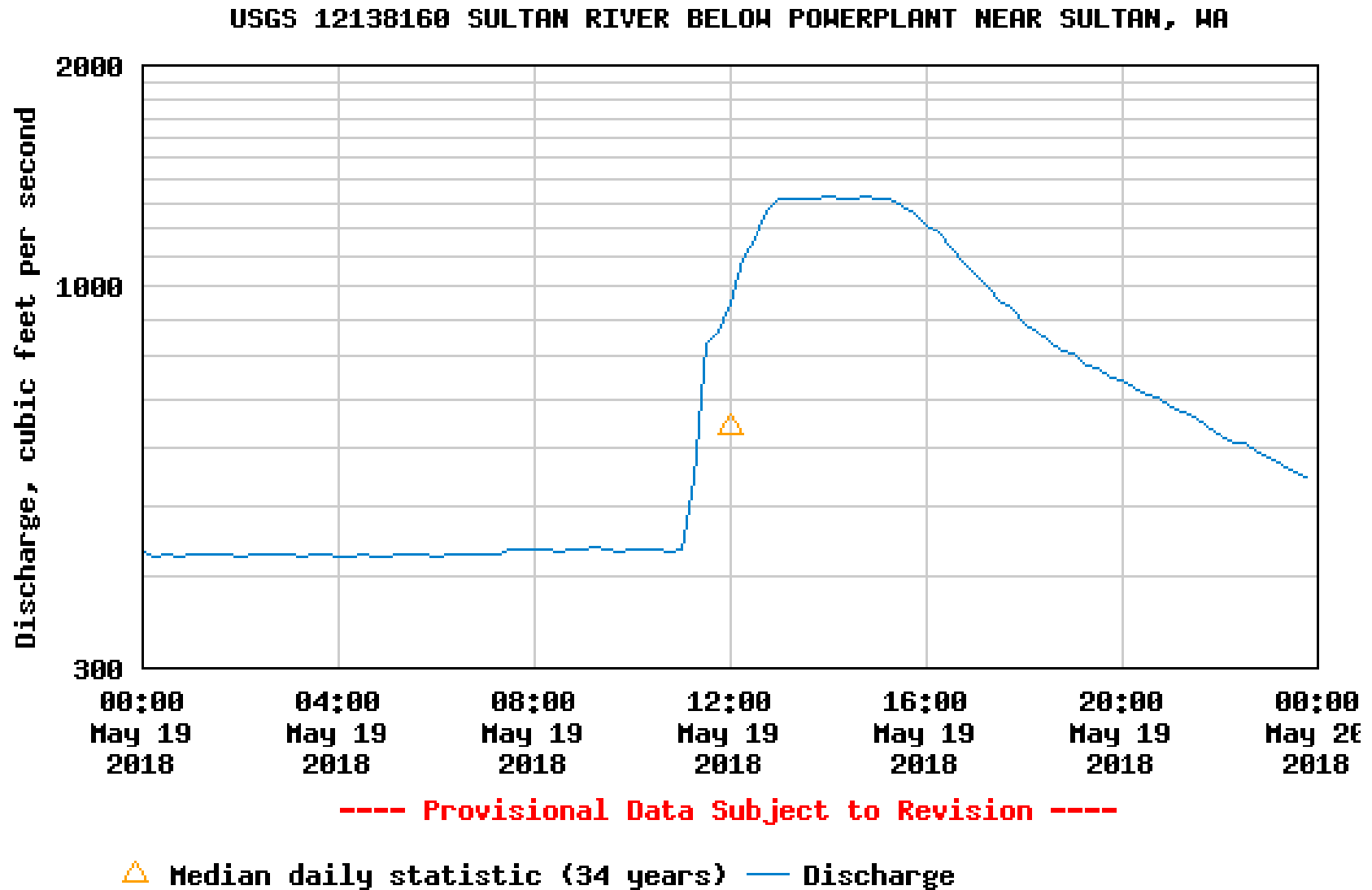


Figure 9. Sultan River immediately downstream of Powerhouse – 5/19/2018.

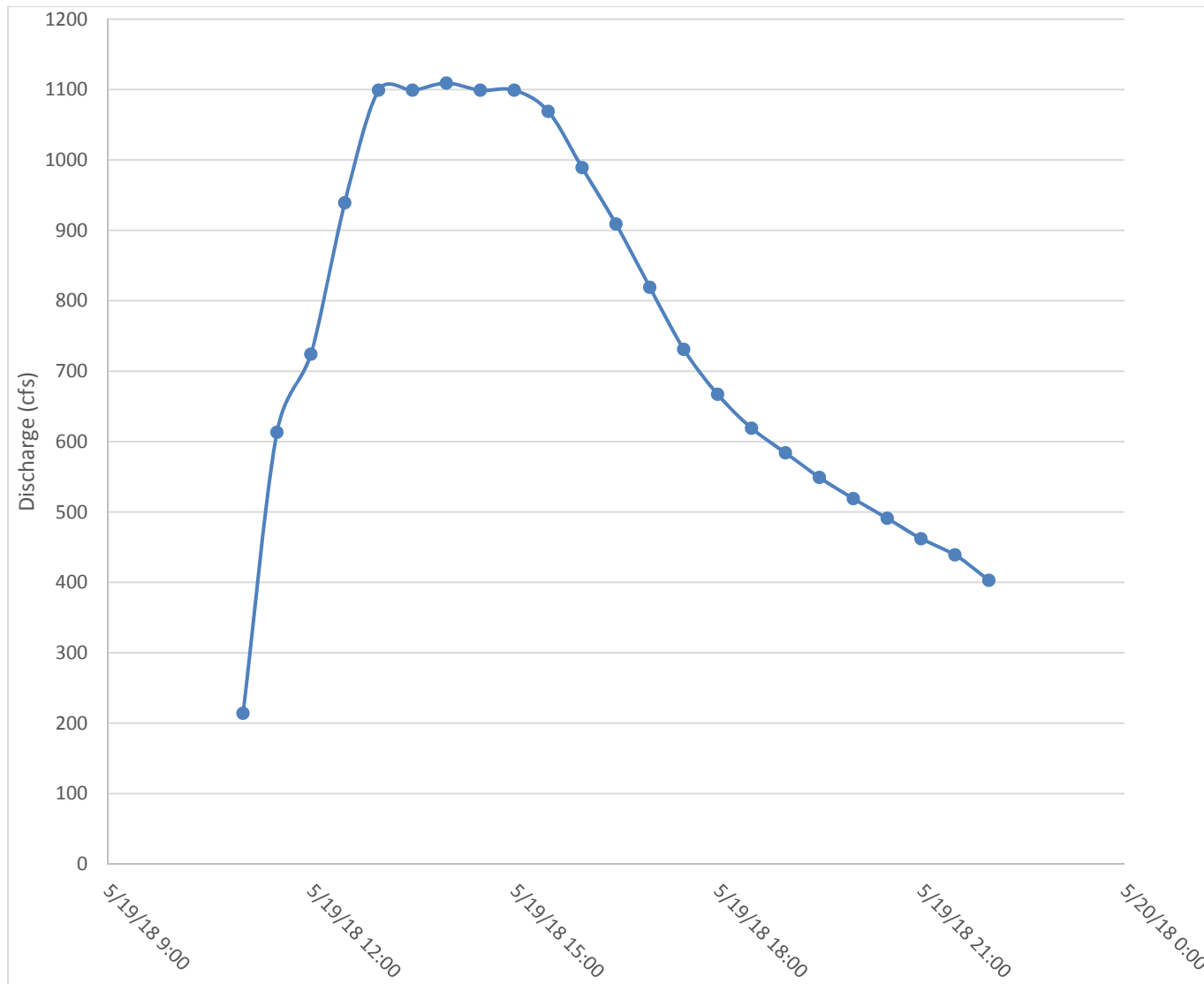


Figure 10. Sultan River immediately upstream of Powerhouse – 5/19/2018.

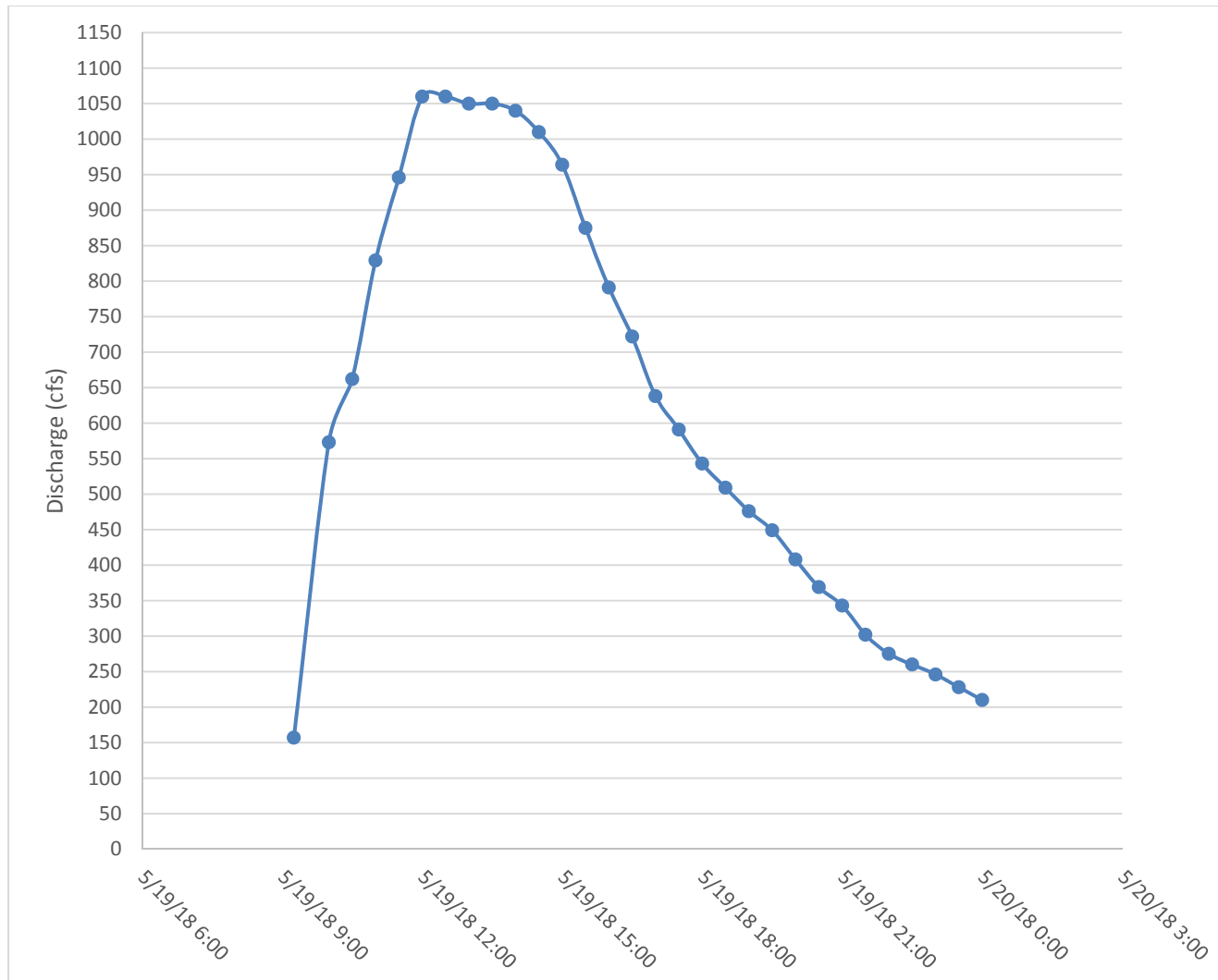


Figure 11. Sultan River immediately upstream of Diversion Dam – 5/19/2018.

3. SPADA LAKE RESERVOIR WATER SURFACE ELEVATIONS

During this reporting period, Spada Lake Reservoir mean daily water surface elevations ranged between 1,400.9 and 1,447.0 feet msl, with the low on October 16, 2017, and the high on July 1, 2017. Figure 12 displays the mean daily water surface elevations of Spada Lake Reservoir, and Appendix 1 contains the data in tabular format.

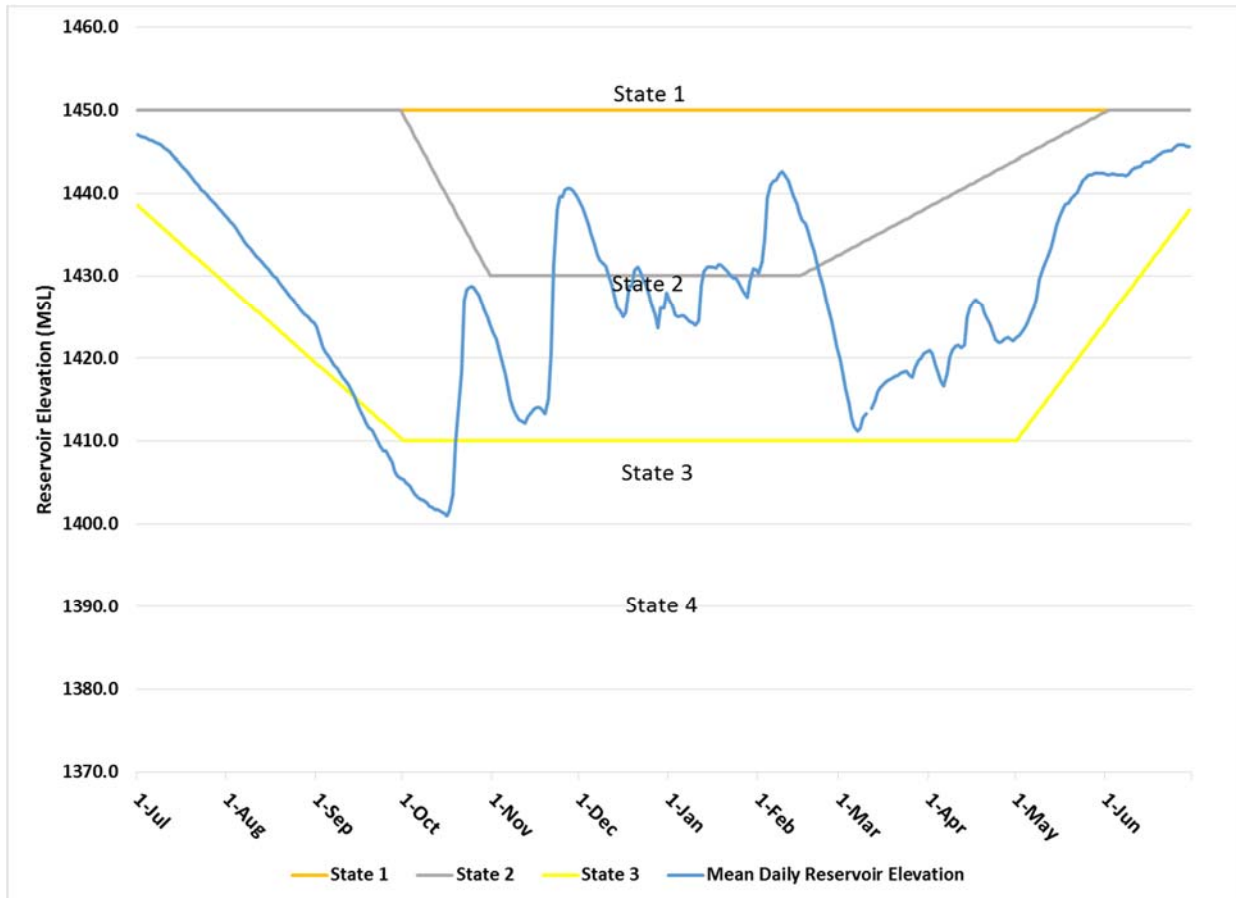


Figure 12. Mean daily water surface elevation, Spada Lake Reservoir, July 1, 2017 – June 30, 2018.

4. DEVIATIONS FROM STATE 3

License Article 406 requires:

When Spada Lake is in State 3, subject to meeting the (1) City of Everett's water supply requirements and other conditions of this license, the licensee shall maintain a minimum impoundment water surface elevation in Spada Lake above 1,430 feet mean sea level (msl), as measured at U.S. Geological Survey gage no. 12137300, Spada Lake near Startup, Washington, between July 1 and August 15. Until the temperature conditioning structure required by Appendix A, condition 5.2 (A-LA 3), and Appendix B, condition 2 (A-LA 3) is installed and operational (from license issuance until the earlier of (a) two

years after the date the District completes the Sultan River diversion dam's volitional fish passage modifications, described in A-LA 13 or (b) January 1, 2020), the licensee shall maintain a minimum impoundment water surface elevation in Spada Lake Reservoir at or above 1,420 feet msl from August 16 through September 15.⁸

In 2017, during the period of August 16 to September 15, the water surface in Spada Lake Reservoir dropped below the Project's License Article 406 target elevation of 1,420 feet msl. Specifically, at the end of day on September 6, the Spada Lake Reservoir had dropped below 1,420 feet msl and continued to decline to an elevation of 1,414.4 feet msl on September 15. During this 30-day period, the Project was operated at minimum flow levels, with the exception of the multi-purpose Process Flow on September 2. The cumulative impact of the climatic conditions prevalent during summer 2017 lead to accelerated drafting of the reservoir. During summer 2017, precipitation in the Sultan River watershed was 42.3 percent of the long-term historical average. In its letter dated November 3, 2017, FERC stated that the deviation will not be considered a violation of Article 406. Appendix 2 contains documentation regarding this deviation.

⁸ *Public Utility District No. 1 of Snohomish County*, 137 FERC ¶ 61,221 (2011), Order Denying Rehearing And Granting Clarification, issued December 15, 2011.

Appendix 1

Spada Lake Reservoir Mean Daily Elevations Tabular Format

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
7/1	1447.01		8/1	1437.03		9/1	1423.76
7/2	1446.87		8/2	1436.69		9/2	1422.39
7/3	1446.74		8/3	1436.21		9/3	1421.3
7/4	1446.6		8/4	1435.8		9/4	1420.69
7/5	1446.39		8/5	1435.32		9/5	1420.14
7/6	1446.26		8/6	1434.63		9/6	1419.66
7/7	1446.05		8/7	1434.16		9/7	1419.18
7/8	1445.98		8/8	1433.75		9/8	1418.7
7/9	1445.78		8/9	1433.34		9/9	1418.22
7/10	1445.51		8/10	1432.86		9/10	1417.68
7/11	1445.23		8/11	1432.51		9/11	1417.2
7/12	1444.96		8/12	1432.04		9/12	1416.72
7/13	1444.55		8/13	1431.76		9/13	1416.1
7/14	1444.21		8/14	1431.35		9/14	1415.28
7/15	1443.8		8/15	1430.87		9/15	1414.39
7/16	1443.39		8/16	1430.46		9/16	1413.64
7/17	1443.04		8/17	1430.05		9/17	1412.89
7/18	1442.63		8/18	1429.71		9/18	1412.07
7/19	1442.22		8/19	1429.23		9/19	1411.59
7/20	1441.82		8/20	1428.75		9/20	1411.25
7/21	1441.34		8/21	1428.28		9/21	1410.6
7/22	1440.99		8/22	1427.86		9/22	1410.02
7/23	1440.45		8/23	1427.45		9/23	1409.4
7/24	1440.17		8/24	1426.98		9/24	1408.72
7/25	1439.76		8/25	1426.5		9/25	1408.79
7/26	1439.35		8/26	1426.02		9/26	1408.17
7/27	1439.08		8/27	1425.54		9/27	1407.49
7/28	1438.6		8/28	1425.27		9/28	1406.33
7/29	1438.26		8/29	1424.99		9/29	1405.85
7/30	1437.92		8/30	1424.51		9/30	1405.51
7/31	1437.44		8/31	1424.24			

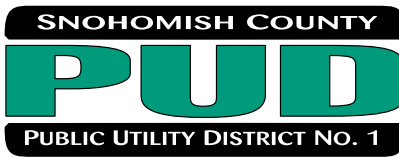
Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
10/1	1405.37		11/1	1423.08		12/1	1438.94
10/2	1405.03		11/2	1422.26		12/2	1438.33
10/3	1404.62		11/3	1421.03		12/3	1437.23
10/4	1404.14		11/4	1419.73		12/4	1436.28
10/5	1403.66		11/5	1418.16		12/5	1435.04
10/6	1403.18		11/6	1416.65		12/6	1433.81
10/7	1403.04		11/7	1414.94		12/7	1432.72
10/8	1402.91		11/8	1413.71		12/8	1431.90
10/9	1402.57		11/9	1413.1		12/9	1431.49
10/10	1402.16		11/10	1412.55		12/10	1431.15
10/11	1402.02		11/11	1412.28		12/11	1430.19
10/12	1401.75		11/12	1412.14		12/12	1428.89
10/13	1401.75		11/13	1412.89		12/13	1427.52
10/14	1401.47		11/14	1413.37		12/14	1426.16
10/15	1401.27		11/15	1413.78		12/15	1425.61
10/16	1400.99		11/16	1413.98		12/16	1424.99
10/17	1401.61		11/17	1413.98		12/17	1425.54
10/18	1403.59		11/18	1413.71		12/18	1428.75
10/19	1409.81		11/19	1413.3		12/19	1428.75
10/20	1413.51		11/20	1415.08		12/20	1430.66
10/21	1418.29		11/21	1420.55		12/21	1431.07
10/22	1426.98		11/22	1431.28		12/22	1430.46
10/23	1428.41		11/23	1438.05		12/23	1429.64
10/24	1428.69		11/24	1439.56		12/24	1428.68
10/25	1428.69		11/25	1439.56		12/25	1427.59
10/26	1428.28		11/26	1440.45		12/26	1426.36
10/27	1427.66		11/27	1440.65		12/27	1425.19
10/28	1426.77		11/28	1440.58		12/28	1423.69
10/29	1425.88		11/29	1440.17		12/29	1426.08
10/30	1424.92		11/30	1439.63		12/30	1426.04
10/31	1423.97					12/31	1428.00

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
1/1	1427.113		2/1	1430.36		3/1	1419.73
1/2	1426.224		2/2	1431.77		3/2	1418.05
1/3	1425.267		2/3	1434.53		3/3	1416.29
1/4	1424.993		2/4	1439.48		3/4	1414.53
1/5	1425.13		2/5	1441.11		3/5	1412.74
1/6	1425.13		2/6	1441.47		3/6	1411.72
1/7	1424.788		2/7	1441.6		3/7	1411.22
1/8	1424.378		2/8	1442.28		3/8	1411.46
1/9	1424.309		2/9	1442.59		3/9	1412.74
1/10	1423.968		2/10	1442.2		3/10	1413.24
1/11	1424.515		2/11	1441.56		3/11	
1/12	1428.891		2/12	1440.65		3/12	1413.95
1/13	1430.532		2/13	1439.68		3/13	1414.85
1/14	1431.079		2/14	1438.71		3/14	1415.86
1/15	1431.079		2/15	1437.62		3/15	1416.44
1/16	1431.079		2/16	1436.71		3/16	1416.83
1/17	1430.942		2/17	1436.3		3/17	1417.15
1/18	1431.421		2/18	1435.35		3/18	1417.41
1/19	1431.284		2/19	1434.21		3/19	1417.61
1/20	1430.874		2/20	1432.94		3/20	1417.74
1/21	1430.532		2/21	1431.62		3/21	1417.84
1/22	1430.19		2/22	1430.25		3/22	1418.17
1/23	1429.711		2/23	1428.85		3/23	1418.3
1/24	1429.711		2/24	1427.44		3/24	1418.42
1/25	1429.232		2/25	1426.03		3/25	1417.84
1/26	1428.39		2/26	1424.49		3/26	1417.63
1/27	1427.8		2/27	1422.96		3/27	1418.83
1/28	1427.41		2/28	1421.33		3/28	1419.68
1/29	1429.41					3/29	1420.02
1/30	1430.88					3/30	1420.47
1/31	1430.77					3/31	1420.76

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
4/1	1420.88		5/1	1422.45		6/1	1442.34
4/2	1420.53		5/2	1422.7		6/2	1442.23
4/3	1419.31		5/3	1423.15		6/3	1442.27
4/4	1418.14		5/4	1423.79		6/4	1442.32
4/5	1417.16		5/5	1424.34		6/5	1442.25
4/6	1416.65		5/6	1425.22		6/6	1442.17
4/7	1418.08		5/7	1426.19		6/7	1442.17
4/8	1420.11		5/8	1427.3		6/8	1442.14
4/9	1420.91		5/9	1429.55		6/9	1442.36
4/10	1421.44		5/10	1430.82		6/10	1442.87
4/11	1421.53		5/11	1431.65		6/11	1443.07
4/12	1421.19		5/12	1432.4		6/12	1443.12
4/13	1421.6		5/13	1433.48		6/13	1443.31
4/14	1424.87		5/14	1434.81		6/14	1443.64
4/15	1426.04		5/15	1436.16		6/15	1443.74
4/16	1426.75		5/16	1437.28		6/16	1443.79
4/17	1427.08		5/17	1438.06		6/17	1443.95
4/18	1426.78		5/18	1438.6		6/18	1444.22
4/19	1426.45		5/19	1438.82		6/19	1444.48
4/20	1425.41		5/20	1439.33		6/20	1444.78
4/21	1424.8		5/21	1439.72		6/21	1444.99
4/22	1423.97		5/22	1440.16		6/22	1445.08
4/23	1422.99		5/23	1440.86		6/23	1445.09
4/24	1422.22		5/24	1441.51		6/24	1445.11
4/25	1421.82		5/25	1441.94		6/25	1445.61
4/26	1421.95		5/26	1442.17		6/26	1445.82
4/27	1422.33		5/27	1442.23		6/27	1445.82
4/28	1422.49		5/28	1442.38		6/28	1445.74
4/29	1422.31		5/29	1442.45		6/29	1445.62
4/30	1422.1		5/30	1442.45		6/30	1445.56
			5/31	1442.43			

Appendix 2

Documentation Regarding Spada Lake Reservoir Deviation



Your Community Energy Partner

September 15, 2017

VIA ELECTRONIC FILING

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

**Re: Jackson Hydroelectric Project, FERC No. 2157
License Article 406 – Reservoir Elevation on September 15, 2017**

Dear Secretary Bose:

This letter is to notify the Commission that Public Utility District No. 1 of Snohomish County's (the District) Spada Lake Reservoir of the Jackson Hydroelectric Project (Project) water surface elevation went below the Project's License Article 406 target elevation of 1,420 feet msl defined for the period of August 16 to September 15, 2017. Specifically, on September 6, 2017, the Spada Lake Reservoir dropped below 1,420 feet msl and continued to decline to an elevation of 1,415 feet msl on September 15, 2017, the final day of the target elevation. This deviation was the result of abnormally dry weather which severely limited Spada Lake Reservoir inflows at the Project. In July and August 2017, mean monthly inflows to the reservoir were approximately 58% and 34% of the long term mean for those months, respectively. The influence of these climatic factors on reservoir elevation was further exacerbated by the annual whitewater (under License Article 412: Whitewater Recreation Plan) and process flow (under License Article 416: Process Flow Plan) releases scheduled by the license to occur during the first two weeks of September. This year, these releases were conducted on September 2, 2017.

The reduction in reservoir elevation level did not create any adverse environmental impacts, nor did it impact the usability of the boat ramp at the South Fork Recreation Site. The Aquatic Resource Committee was notified today of this reservoir elevation event. The information in this letter will be reported in the Operational Compliance Monitoring Report pursuant to License Article 407 as required by License Article 406.

If you have any questions regarding this letter, please do not hesitate to contact Keith Binkley, Manager of Natural Resources, at (425)783-1769 or KMBinkley@snopud.com.

Sincerely,

/s/ Tom DeBoer

Tom DeBoer
Assistant General Manager of Generation, Power, Rates and Transmission Management
TADeBoer@snopud.com
(425) 783-1825

cc: ARC

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

Project No. 2157-236– Washington
Henry M. Jackson Hydroelectric Project
Public Utility District No. 1 of
Snohomish County

November 3, 2017

Mr. Tom DeBoer
Public Utility District No. 1 of
Snohomish County, Washington
2320 California Street, P.O. Box 1107
Everett, WA 98206-1107

Subject: Notification of Reservoir Level Deviation– Article 406

Dear Mr. DeBoer:

Thank you for your letter filed on September 18, 2017, in which you notified us of a deviation from the required reservoir elevation at Spada Lake Reservoir, part of the Henry M. Jackson Hydroelectric Project No. 2157.¹ As discussed in more detail below, we will not consider the deviation that began on September 6, 2017, a violation of Article 406 of your license.

License Requirements

Article 406 requires that you operate the Henry M. Jackson Project consistent with the Spada Lake reservoir rule curves which divide Spada Lake water elevations into five states that dictate water management and shift throughout the water year (July 1 through June 30). Water management under State 3, zone of discretionary operation, requires you, in part, to maintain a minimum impoundment water surface elevation in Spada Lake Reservoir at or above 1,420 feet mean sea level (msl) from August 16 through September 15 until a temperature conditioning structure is installed.²

¹ *Public Utility District No. 1 of Snohomish County*, 136 FERC ¶ 62,188 (2011).

² After a temperature Conditioning Structure is installed and operational, you are required to maintain a minimum impoundment water surface elevation in Spada Lake above 1,415 feet msl from August 16 through September 15.

The minimum Spada Lake water surface elevations may be modified as a result of system emergencies, operating emergencies beyond your control, and for short periods of time upon mutual agreement with the National Marine Fisheries Service, The Forest Service, the U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, Washington Department of Ecology, Tulalip Tribes, Snohomish County, City of Everett, City of Sultan, and American Whitewater. If the impoundment water surface elevation is modified as described above, you must notify the Aquatic Resource Committee and the Commission within two business days after each such incident.³ You must also document the modification in the annual operational compliance monitoring report filed with the Commission pursuant to Article 407, and describe the emergency that resulted in the modification of the water surface elevation.

The Commission's Order Approving Operation Compliance Plan,⁴ describes, in part, how you will monitor compliance with the project flow requirements, as specified in Article 407 of your license and includes provisions to ensure that the powerhouse gage, the diversion dam streamflow gage, and Spada Lake water surface elevation gage are operated and maintained to provide streamflow and lake level monitoring at no less than 15-minute intervals. Your approved plan, in part, requires you to file with the Commission an annual operation compliance monitoring report by November 1. The report must include the dates, duration, and quantities of the process flow released, Spada Lake daily water surface elevation, and deviations from the targeted State 3 water surface elevations with the reasons for the deviations and any proposals for corrective actions to avoid future occurrences. The annual report must include documentation of consultation with the Aquatic Resources Committee and specific descriptions of how the Aquatic Resources Committee's comments are accommodated.

Deviation Incident

In your September 18 letter, you state that, on September 6, 2017, the Spada Lake Reservoir elevation went below the required target elevation of 1,420 feet msl and continued to decline to an elevation of 1,415 feet msl on September 15 (the final day of the target elevation requirement). You state that this deviation was due to abnormally dry weather which limited Spada Lake Reservoir inflows. You explain that the mean monthly inflow to the reservoir in July and August 2017 were approximately 58% and

³ The Aquatic Resource Committee is comprised of representatives from the National Marine Fisheries Service; the U.S. Forest Service, the U.S. Fish and Wildlife Service; the Washington Department of Fish and Wildlife; the Washington Department of Ecology; the Tulalip Tribes; Snohomish County, Washington; the City of Everett, Washington; the City of Sultan, Washington; and American Whitewater.

⁴ *Public Utility District No. 1 of Snohomish County*, 139 FERC ¶ 62,026 (2012).

34% of the long term mean for those months, respectively. Furthermore, you state that the reservoir elevation was further exacerbated by the annual whitewater and process flow releases (required under license Articles 412 and 416, respectively) scheduled to occur during the first two weeks of September. Specifically, these releases were conducted on September 2, 2017. You conclude that the reduction in reservoir elevation did not create any adverse environmental effects, nor did it impact the usability of the boat ramp at the South Fork Recreation Site. You notified the Aquatic Resource Committee of this event on September 18, 2017 (email documentation of notification is included with your letter), and you note that you will also report this deviation in the annual Operation Compliance Monitoring Report.

Review

After review of the available information, the deviation resulted from dry weather conditions in July and August of 2017. Therefore, we will not consider the deviation that occurred between September 6 and 15, 2017, a violation of Article 406 of your license. You notified the appropriate resource agencies and you did not observe any adverse environmental effects.

Thank you for your cooperation. If you have any questions regarding this letter, please contact Zeena Aljibury at (202) 502-6065 or Zeena.Aljibury@ferc.gov.

Sincerely,

Kelly Houff
Chief, Engineering Resources Branch
Division of Hydropower Administration
and Compliance

Appendix 3

Consultation Documentation Regarding Draft Report

Presler, Dawn

From: Presler, Dawn
Sent: Wednesday, August 22, 2018 11:10 AM
To: 'Anne Savery'; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'Vacirca, Richard -FS'; 'lindsay_asman@fws.gov'; 'Janet Curran - NOAA Federal'; 'nate.morgan@ci.sultan.wa.us'; 'Jim Miller (JMiller@everettwa.gov)'; 'Rustay, Michael'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith
Subject: JHP (FERC No. 2157) - OCMP Draft Annual Rpt for your 30-day review and comment
Attachments: 201810 OCMP Annual Report WY 17-18.pdf

Dear ARC,

Attached is the draft annual report for the Operations Compliance Monitoring Plan for Water Year 2017-2018. Please take the next 30-days to review and provide comments, if any, back to me with cc: to Keith by Friday September 21. Thanks.

Dawn Presler
Sr. Environmental Coordinator
Generation Resources
(425) 783-1709

PUD No. 1 of Snohomish County
PO Box 1107
Everett, WA 98206-1107

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.

Dated at Everett, Washington, this 19th day of October, 2018.



Dawn Presler, Sr. Environmental Coordinator
Public Utility District No. 1 of Snohomish County
PO Box 1107
Everett, WA 98206-1107
Phone: (425) 783-1709
E-mail: DJPresler@snopud.com

Presler, Dawn

From: Presler, Dawn
Sent: Friday, October 19, 2018 8:52 AM
To: 'Vacirca, Richard -FS'; 'Janet Curran - NOAA Federal'; 'lindsay_asman@fws.gov'; 'Anne Savery'; 'brock.applegate@dfw.wa.gov' (brock.applegate@dfw.wa.gov); 'James (ECY) Pacheco' (JPAC461@ECY.WA.GOV); 'Jim Miller (JMiller@everettwa.gov)'; 'nate.morgan@ci.sultan.wa.us'; 'Rustay, Michael'; 'okeefe@americanwhitewater.org'
Cc: Binkley, Keith
Subject: JHP (FERC No. 2157) - cc OCMP e-filing with FERC today
Attachments: 20180925 OCMP Annual Rpt WY17-18 FINAL.pdf

Dear ARC,

Attached is the OCMP Annual Report that I will be e-filing with FERC later this morning. Hope you have a great weekend.

Sincerely,

Dawn Presler

Sr. Environmental Coordinator
Generation – Natural Resources
(425) 783-1709

PUD No. 1 of Snohomish County
PO Box 1107
Everett, WA 98206-1107