SNOHOMISH COUNTY PUD
PUBLIC UTILITY DISTRICT NO. 1

Energizing Life in Our Communities

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 2019 – June 2020 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,

Jason A. Zyskowski
Assistant General Manager of Facilities, Generation, Power, Rates and Transmission Management
JAZyskowski@snopud.com
(425) 783-4332

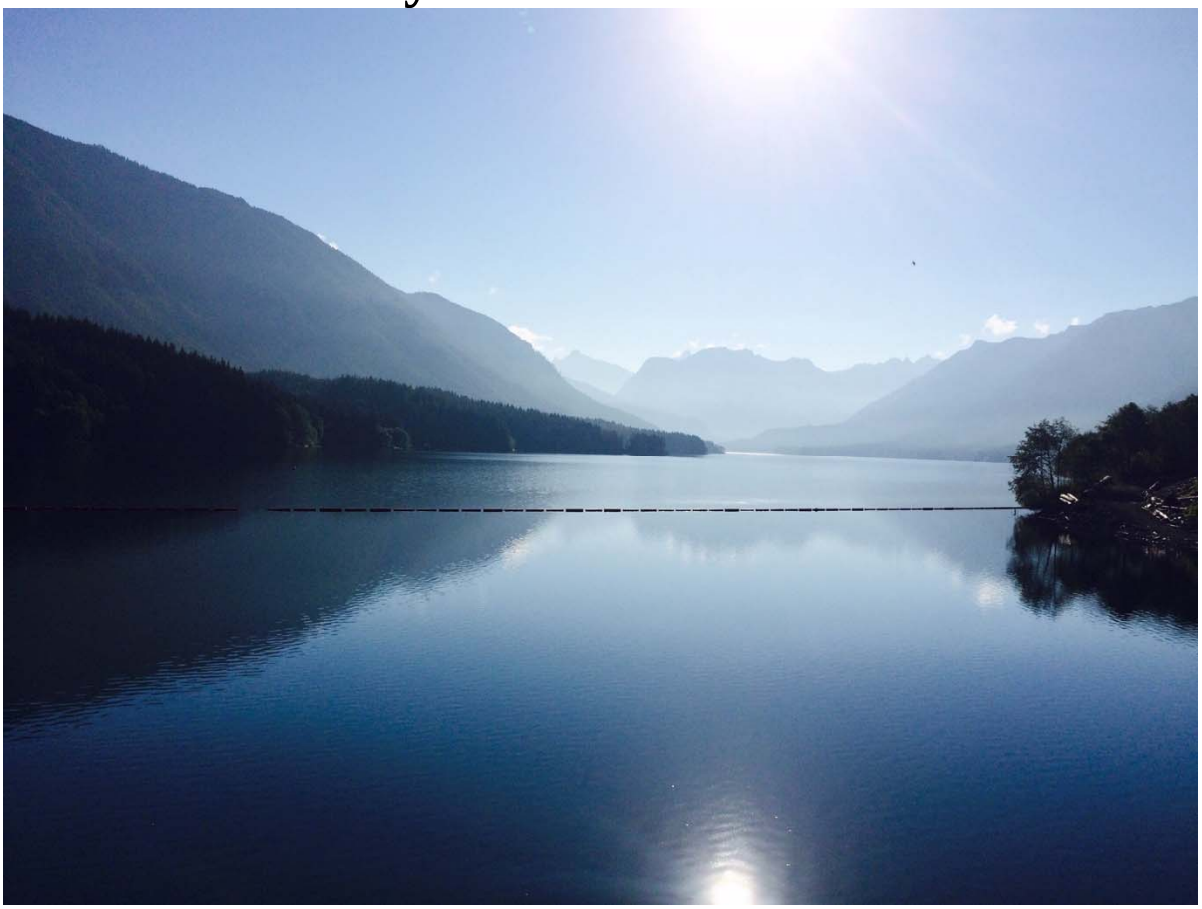
Enclosed: OCMP Annual Report

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 2019 – June 2020



Prepared By:

Everett, WA

October 2020

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). 2020. License Article 407: Operation Compliance Monitoring Plan Annual Report for Water Year July 2019 through June 2020, for the Henry M. Jackson Hydroelectric Project, FERC No. 2157. October 2020.

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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 2019 – June 2020.

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; no comments were received.

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.

2. PROCESS FLOWS

The District provided process flow events pursuant to the Process Flow Plan (PF Plan) on three occasions during the July 2019 – June 2020 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 2019, 2) a channel forming event in February 2020, 3) a nighttime juvenile outmigration and flushing event in April 2020, and 4) a daytime juvenile outmigration event in May 2020. The three reaches of the Sultan River are depicted in Figure 1. The process flow events for the July 2019 – June 2020 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.

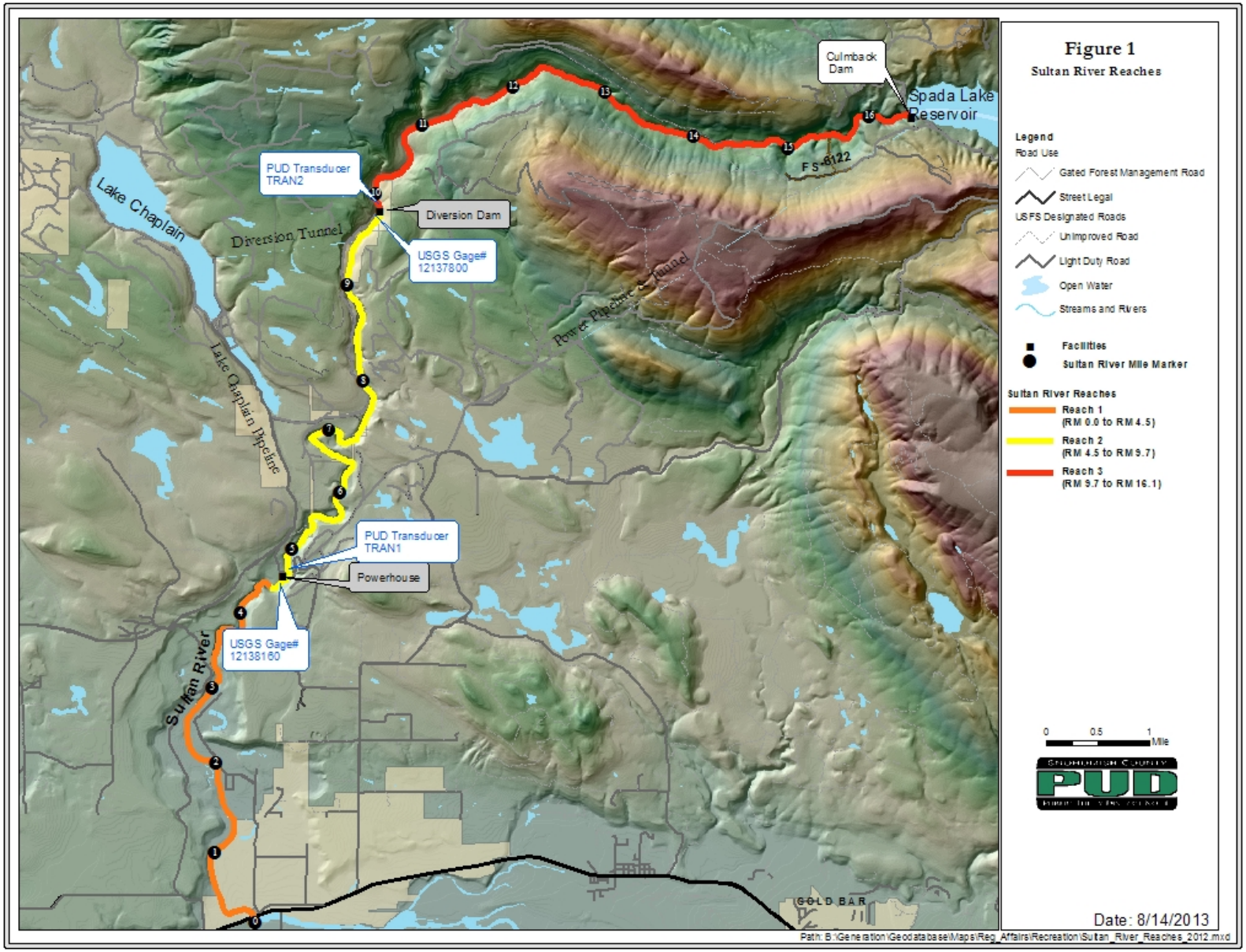

Figure 1. Sultan River reaches.

Table 1. Process Flow Log, July 2019 – June 2020.

Date[1]	Time[2]	Magnitude[3] (cfs)	Duration[4] (hours)	Accretion[5] (cfs)	Notes[6]	Counts as PF Type[7]
9/8/2019	11:45 to 20:15	R1 – 1,353 (average), range 1,210 to 1,460	8.5 hours greater than 1,200 cfs	Estimated at 100 cfs	Reference Figure 2	FL, U
9/8/2019	11:30 to 22:00	R2 – 734 (average), range 505 to 988	10.5 hours greater than 500 cfs	Estimated at 100 cfs	Reference Figure 3	FL, U
9/8/2019	10:00 to 21:45	R3 – 629 (average), range 401 - 908	11.75 hours greater than 400 cfs	Estimated at 100 cfs	Reference Figure 4	FL, U
2/1-2/2020	02:00 on 2-1, to 04:30 on 2-2	R1 – 10,454 (average), range 6,540 – 13,900	26.5 hours greater than 6,500 cfs	Estimated at 500 cfs	Reference Figure 5	FO
4/16-17/2020	23:00 on 4-16, to 05:00 on 4-17	R1 – 1,246 (average), range 1,220 – 1,260	6 hours greater than 1,200 cfs	Estimated at 40 cfs	Reference Figure 6	FL, O
4/16-17/2020	23:00 on 4-16, to 05:00 on 4-17	R2 – 605 (average), range 573 – 616	6 hours greater than 500 cfs	Estimated at 30 cfs	Reference Figure 7	FL, O
4/16-17/2020	21:15 on 4-16, to 05:00 on 4-17	R3 – 504 (average), range 462 – 511	7.75 hours greater than 400 cfs	Estimated at 20 cfs	Reference Figure 8	FL, O
5/19/2020	09:45 to 20:00	R3 – 245 (average), range 204 – 404	10.25 hours greater than 200 cfs	Estimated at 35 cfs	Reference Figure 9	O
5/19/2020	11:45 to 19:00	R2 – 475 (average), range 407 - 495	7.25 hours greater than 400 cfs	Estimated at 45 cfs	Reference Figure 10	O

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

5/19/2020	11:45 to 19:00	R1 – 874 (average). Range 804 - 901	7.25 hours greater than 800 cfs	Estimated at 50 cfs	Reference Figure 11	O

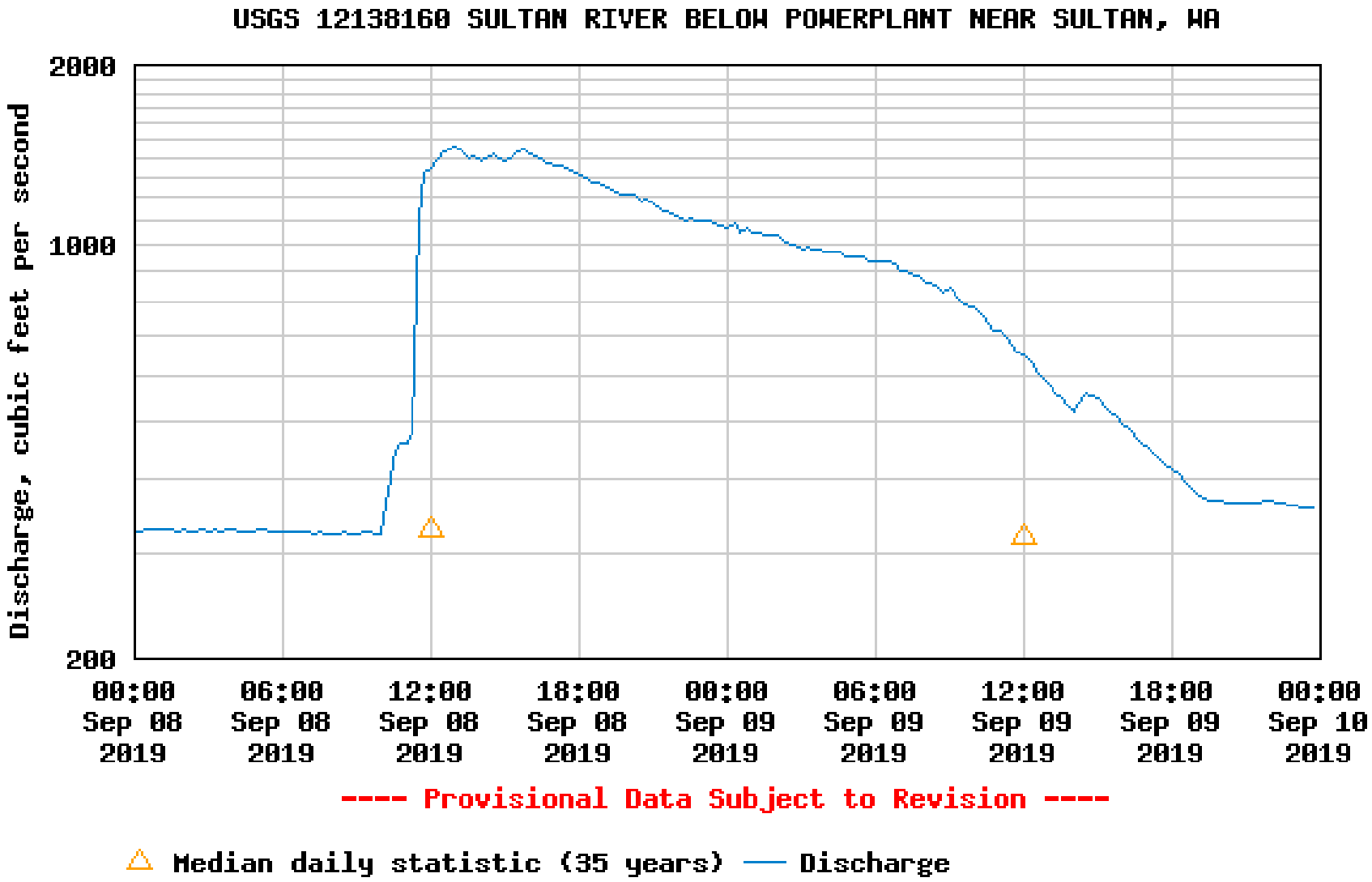

Figure 2. **Sultan River immediately downstream of Powerhouse – 09/8/2019.**

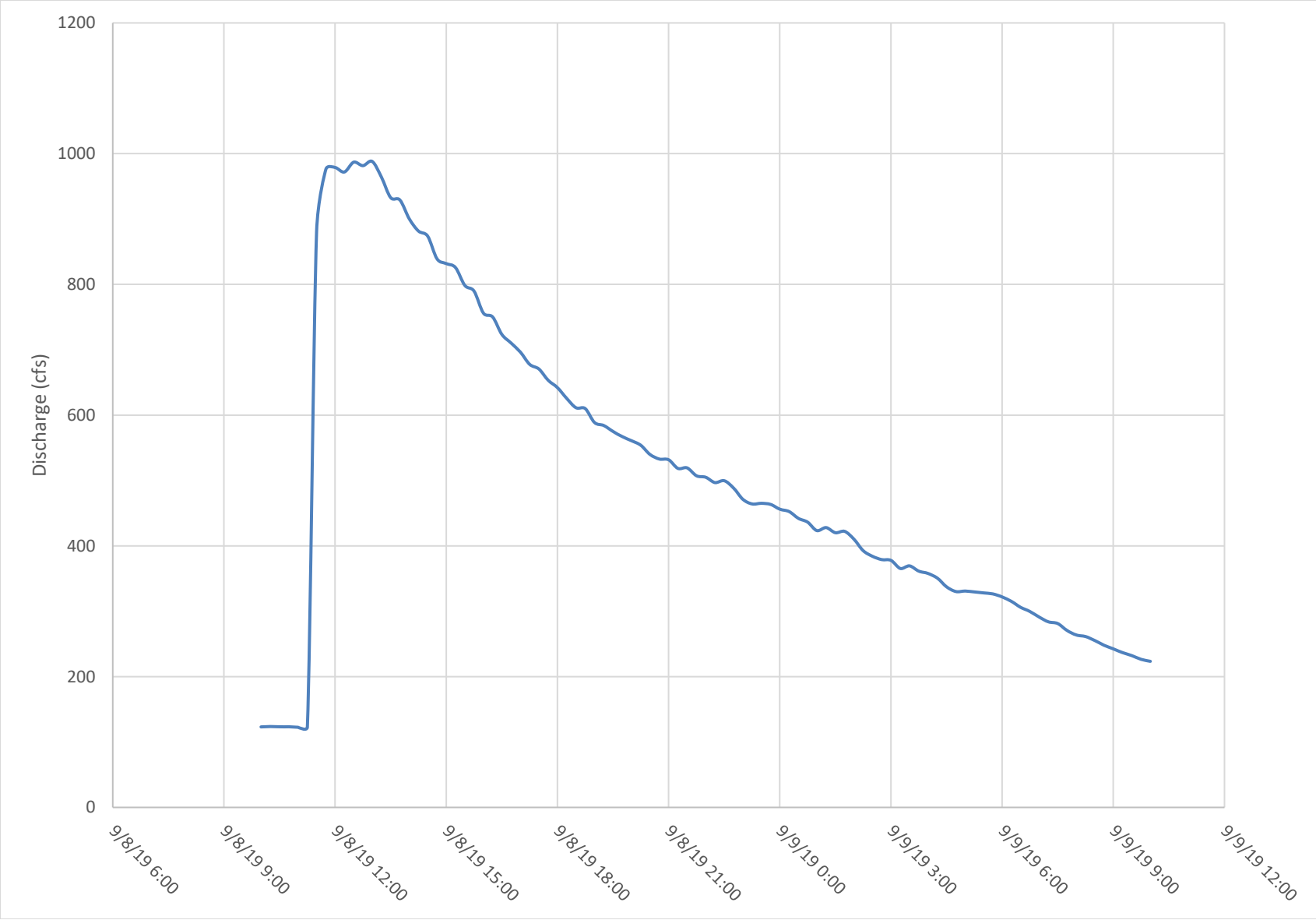

Figure 3. Sultan River immediately upstream of Powerhouse – 09/8/2019.

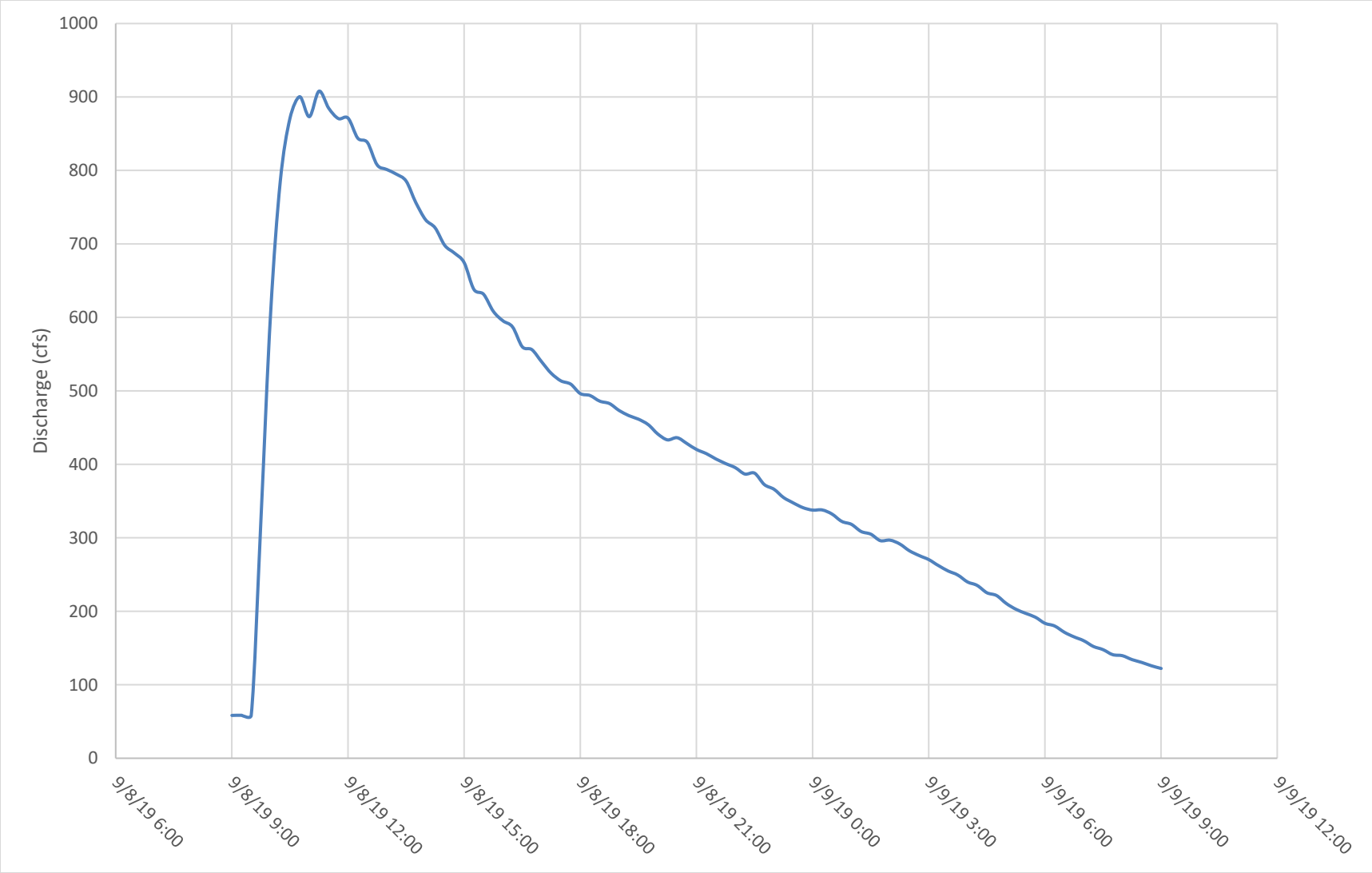

Figure 4. Sultan River immediately upstream of Diversion Dam – 09/8/2019.

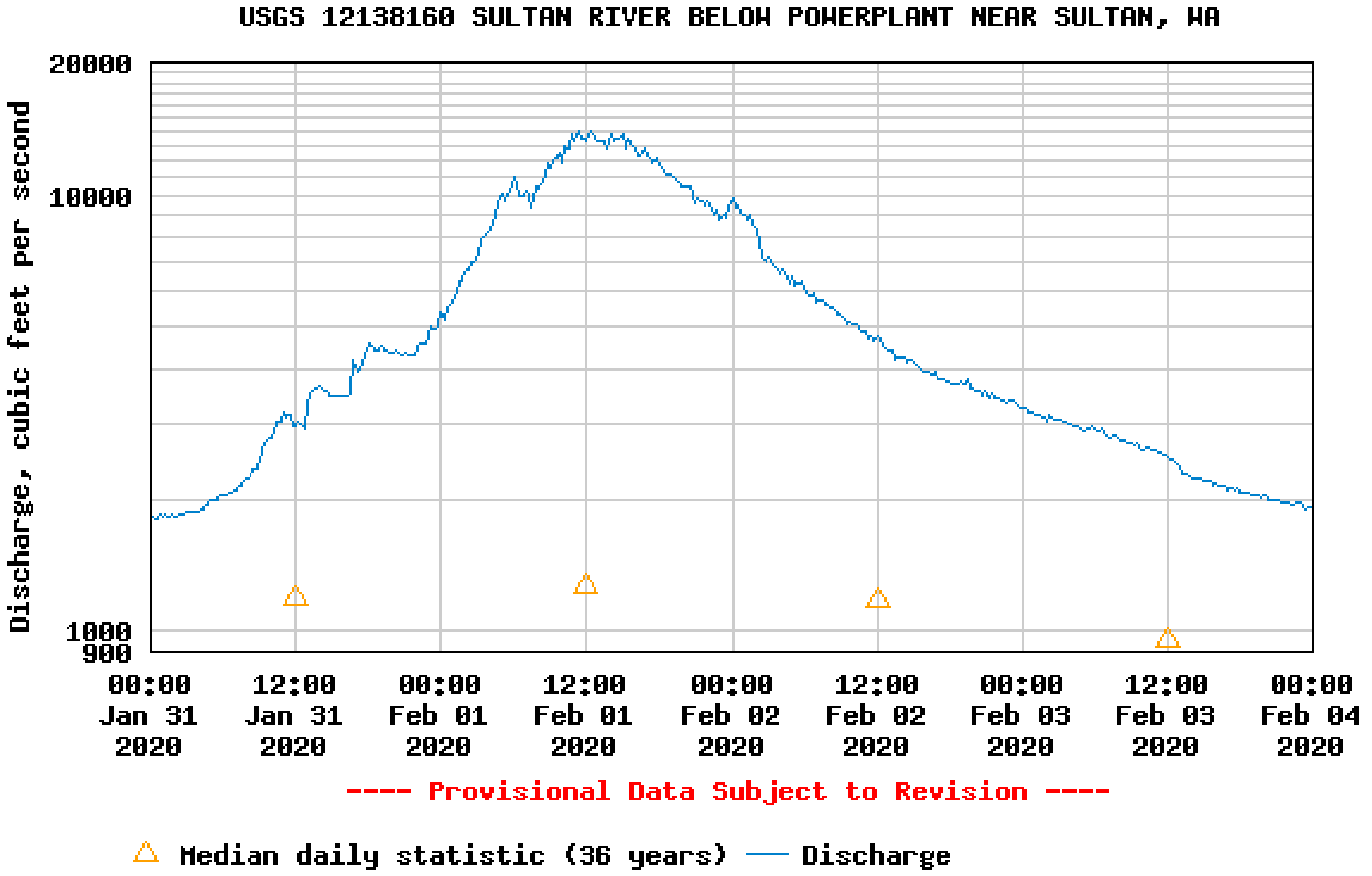

Figure 5. **Sultan River immediately downstream of Powerhouse – 02/01-02/2020.**

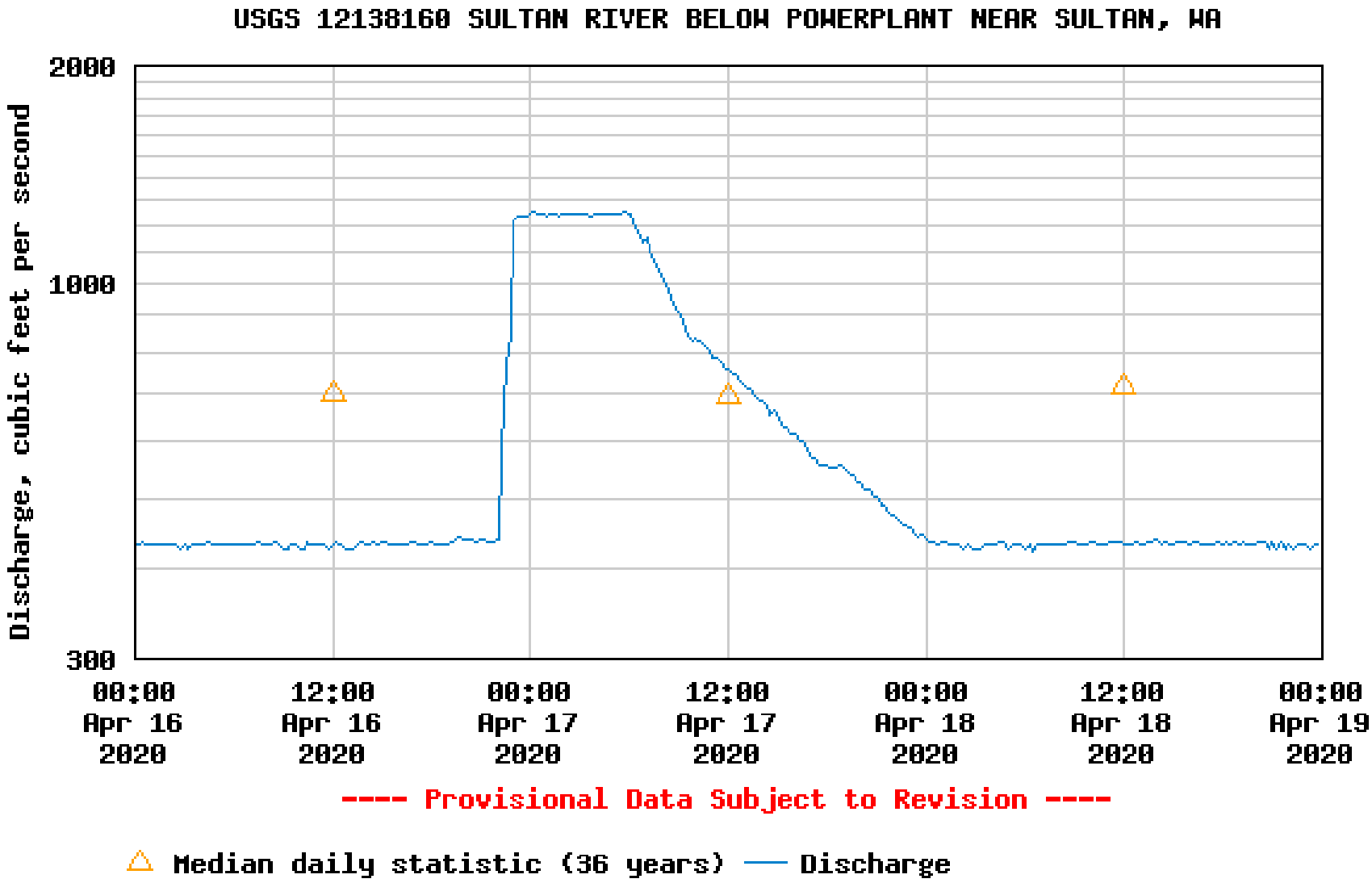

Figure 6. **Sultan River immediately downstream of Powerhouse – 04/16-17/2020.**

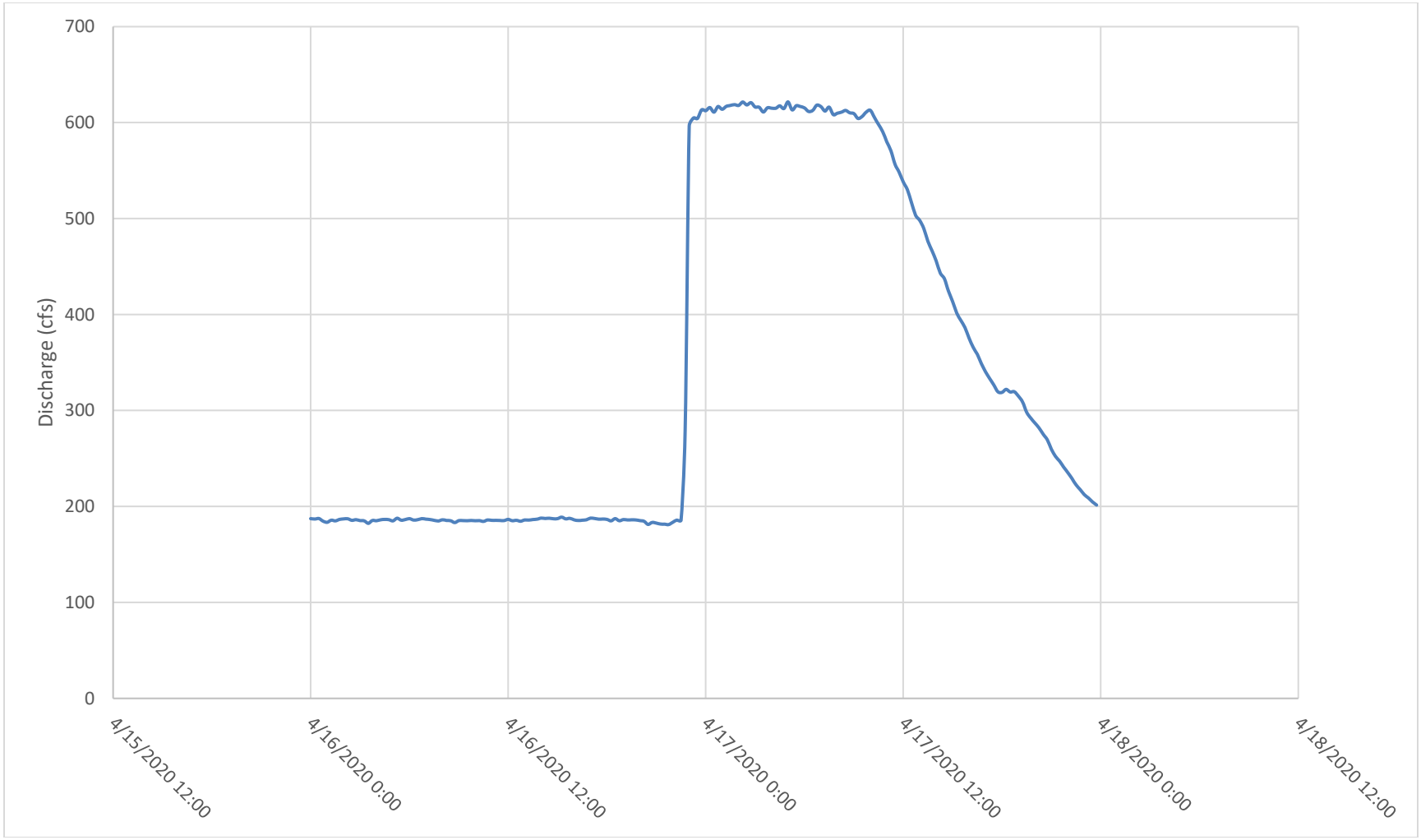

Figure 7. Sultan River immediately upstream of Powerhouse – 04/16-17/2020.

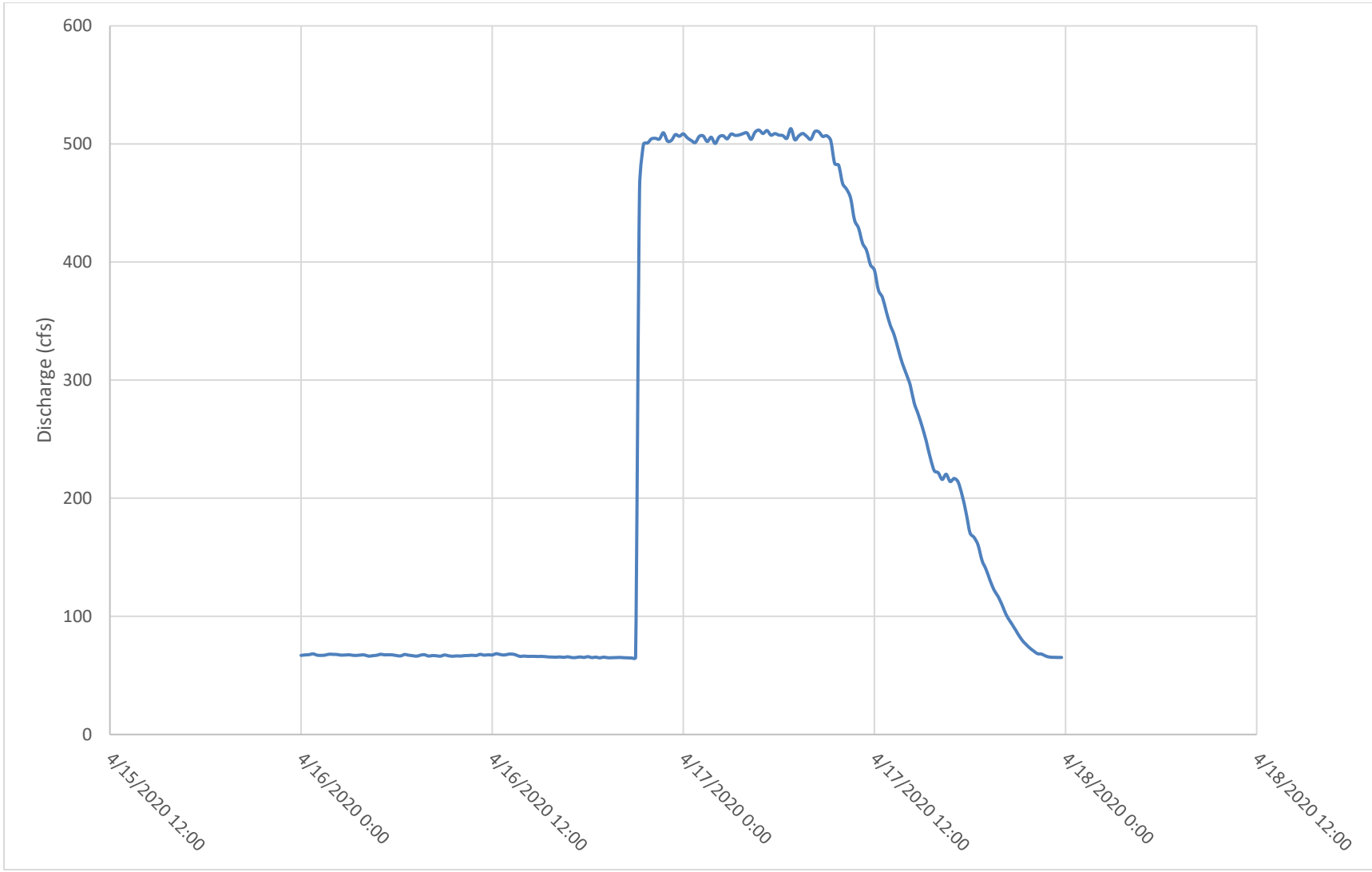

Figure 8. Sultan River immediately upstream of Diversion Dam – 04/16-17/2020.

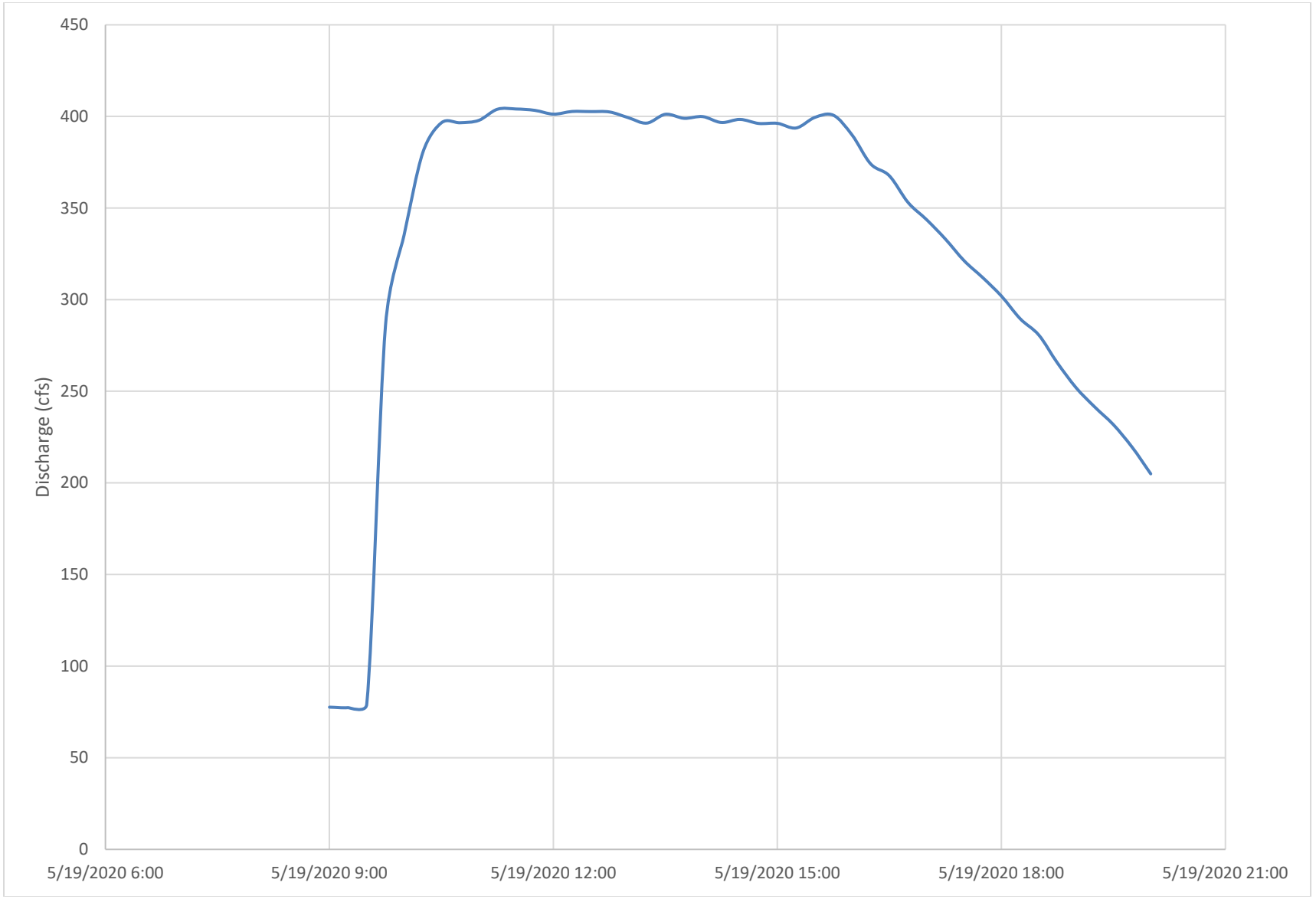

Figure 9. Sultan River immediately upstream of Diversion Dam – 05/19/2020.

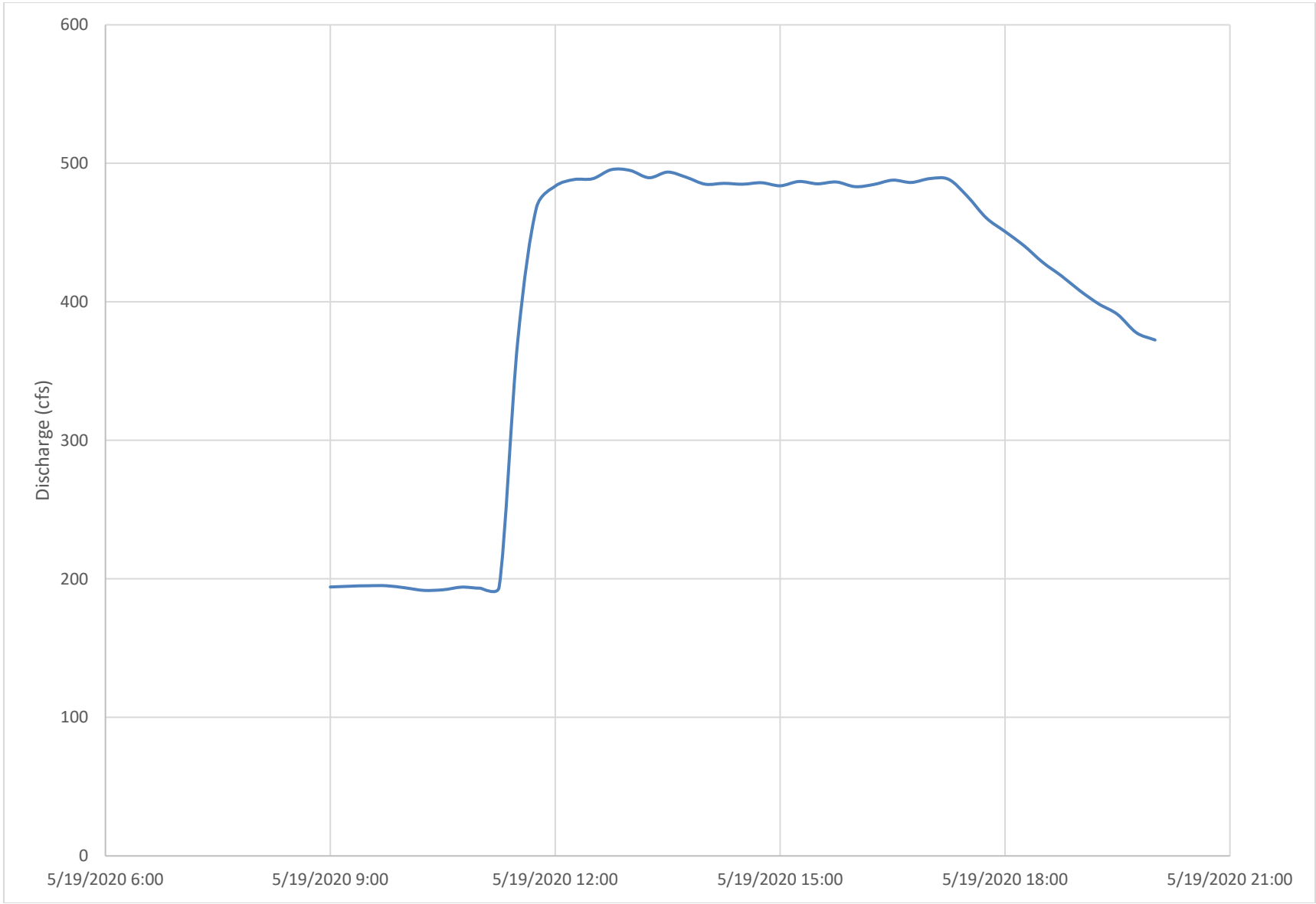

Figure 10. Sultan River immediately upstream of Powerhouse – 05/19/2020.

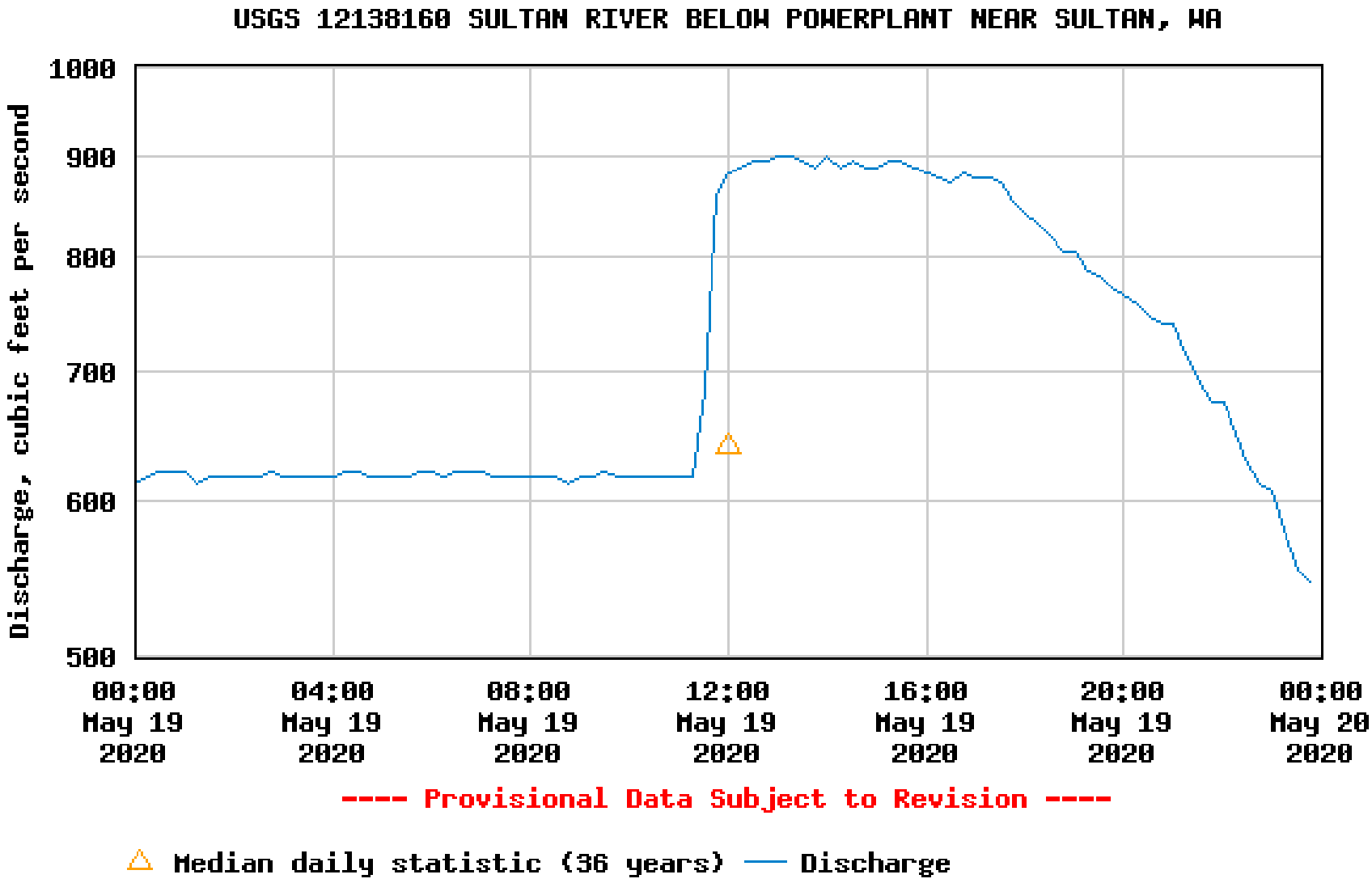

Figure 11. Sultan River immediately downstream of Powerhouse – 05/19/2020.

3. SPADA LAKE RESERVOIR WATER SURFACE ELEVATIONS

During this reporting period, Spada Lake Reservoir daily water surface elevations ranged between 1,404.9 and 1,454.9 feet msl, with the low on September 15, 2019, and the high on February 1, 2020. Figure 12 displays the daily water surface elevations of Spada Lake Reservoir, and Appendix 1 contains the data in tabular format.

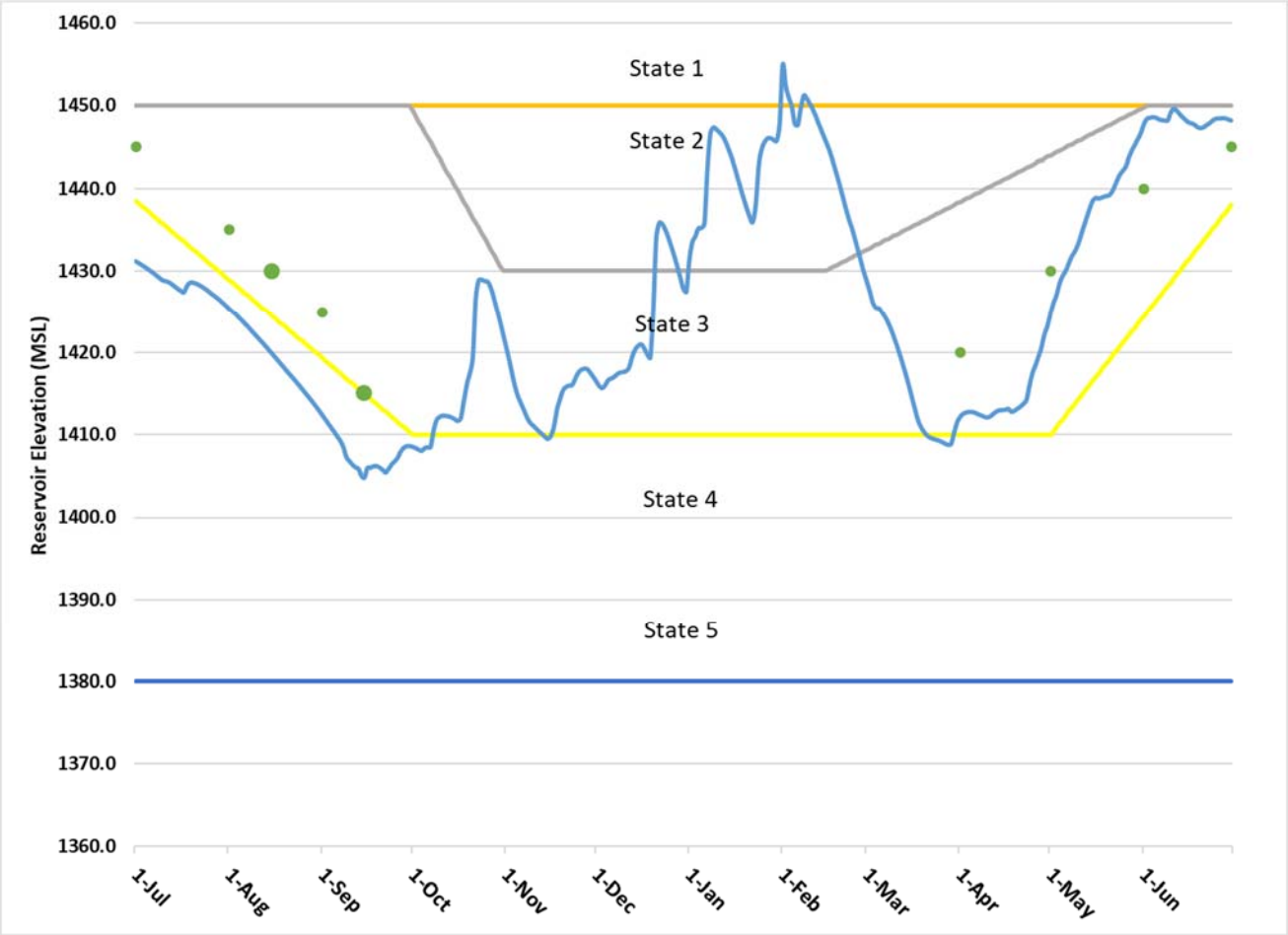

Figure 12. Daily water surface elevation, Spada Lake Reservoir, July 1, 2019 – June 30, 2020.

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,…[a]fter the temperature conditioning structure is installed and operational, the licensee shall maintain a minimum impoundment water surface elevation in Spada Lake above 1,415 feet msl from August 16 through September 15.*[8]

In 2019, the water surface in Spada Lake Reservoir dropped below the Project's License Article 406 target elevation of 1,415 feet msl. Specifically, on August 28, 2019, the Spada Lake Reservoir dropped below 1,415 feet msl and continued to decline to an elevation of 1,404.9 feet msl on September 15, 2019, the final day of the target elevation. This deviation was the result of abnormally dry weather which severely limited inflows to Spada Lake Reservoir during late spring and throughout summer. The Project has operated at minimum flow levels since May 6, 2019, except for releases for the required outmigration, upmigration and flushing flows (under License Article 416) and whitewater recreation flow (under License Article 412) on May 25, 2019, and September 8, 2019. In its letter dated December 20, 2019, 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 Daily Elevations Tabular Format

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
7/1	1431.2		8/1	1425.4		9/1	1412.4
7/2	1431.0		8/2	1425.1		9/2	1411.9
7/3	1430.8		8/3	1424.8		9/3	1411.4
7/4	1430.5		8/4	1424.4		9/4	1410.9
7/5	1430.3		8/5	1424.1		9/5	1410.4
7/6	1430.0		8/6	1423.7		9/6	1409.8
7/7	1429.7		8/7	1423.3		9/7	1409.3
7/8	1429.4		8/8	1422.9		9/8	1408.5
7/9	1429.1		8/9	1422.5		9/9	1407.3
7/10	1428.9		8/10	1422.1		9/10	1406.8
7/11	1428.8		8/11	1421.7		9/11	1406.4
7/12	1428.7		8/12	1421.3		9/12	1406.1
7/13	1428.4		8/13	1420.9		9/13	1405.9
7/14	1428.1		8/14	1420.4		9/14	1405.1
7/15	1427.8		8/15	1420.0		9/15	1404.9
7/16	1427.6		8/16	1419.6		9/16	1406.0
7/17	1427.4		8/17	1419.2		9/17	1406.0
7/18	1428.2		8/18	1418.7		9/18	1406.2
7/19	1428.6		8/19	1418.3		9/19	1406.2
7/20	1428.6		8/20	1417.9		9/20	1406.1
7/21	1428.5		8/21	1417.4		9/21	1405.8
7/22	1428.3		8/22	1417.0		9/22	1405.5
7/23	1428.1		8/23	1416.6		9/23	1405.9
7/24	1427.9		8/24	1416.2		9/24	1406.4
7/25	1427.6		8/25	1415.7		9/25	1406.8
7/26	1427.3		8/26	1415.3		9/26	1407.2
7/27	1427.0		8/27	1414.8		9/27	1407.9
7/28	1426.8		8/28	1414.4		9/28	1408.4
7/29	1426.4		8/29	1413.9		9/29	1408.6
7/30	1426.1		8/30	1413.4		9/30	1408.7
7/31	1425.8		8/31	1412.9			

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
10/1	1408.6		11/1	1420.9		12/1	1416.5
10/2	1408.4		11/2	1419.3		12/2	1416.0
10/3	1408.2		11/3	1417.6		12/3	1415.7
10/4	1408.1		11/4	1415.9		12/4	1416.1
10/5	1408.4		11/5	1414.7		12/5	1416.7
10/6	1408.5		11/6	1413.9		12/6	1416.9
10/7	1408.6		11/7	1413.0		12/7	1417.1
10/8	1410.6		11/8	1412.2		12/8	1417.4
10/9	1411.8		11/9	1411.5		12/9	1417.6
10/10	1412.2		11/10	1411.2		12/10	1417.7
10/11	1412.3		11/11	1410.8		12/11	1417.8
10/12	1412.3		11/12	1410.4		12/12	1418.2
10/13	1412.3		11/13	1410.1		12/13	1419.5
10/14	1412.1		11/14	1409.8		12/14	1420.4
10/15	1411.9		11/15	1409.5		12/15	1420.8
10/16	1411.7		11/16	1409.9		12/16	1421.0
10/17	1412.0		11/17	1411.0		12/17	1420.5
10/18	1414.0		11/18	1413.1		12/18	1419.8
10/19	1416.1		11/19	1414.4		12/19	1419.4
10/20	1417.5		11/20	1415.4		12/20	1425.3
10/21	1419.3		11/21	1415.8		12/21	1434.1
10/22	1426.8		11/22	1416.0		12/22	1435.9
10/23	1428.9		11/23	1416.1		12/23	1435.7
10/24	1429.0		11/24	1416.8		12/24	1435.0
10/25	1428.8		11/25	1417.5		12/25	1434.1
10/26	1428.7		11/26	1417.9		12/26	1433.0
10/27	1428.0		11/27	1418.1		12/27	1431.8
10/28	1426.8		11/28	1418.0		12/28	1430.5
10/29	1425.4		11/29	1417.6		12/29	1429.2
10/30	1423.9		11/30	1417.1		12/30	1427.9
10/31	1422.4					12/31	1427.5

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
1/1	1431.4		2/1	1454.9		3/1	1427.5
1/2	1433.5		2/2	1452.4		3/2	1426.1
1/3	1434.3		2/3	1451.0		3/3	1425.5
1/4	1435.2		2/4	1449.9		3/4	1425.5
1/5	1435.2		2/5	1447.8		3/5	1424.9
1/6	1435.8		2/6	1447.6		3/6	1424.4
1/7	1442.5		2/7	1449.7		3/7	1423.7
1/8	1446.7		2/8	1451.2		3/8	1422.9
1/9	1447.3		2/9	1450.8		3/9	1421.9
1/10	1447.1		2/10	1450.2		3/10	1420.8
1/11	1446.8		2/11	1449.5		3/11	1419.7
1/12	1446.3		2/12	1448.7		3/12	1418.5
1/13	1445.6		2/13	1447.8		3/13	1417.2
1/14	1444.7		2/14	1446.8		3/14	1415.9
1/15	1443.7		2/15	1446.0		3/15	1414.5
1/16	1442.6		2/16	1445.1		3/16	1413.1
1/17	1441.4		2/17	1444.0		3/17	1411.8
1/18	1440.1		2/18	1442.9		3/18	1410.9
1/19	1438.8		2/19	1441.7		3/19	1410.4
1/20	1437.7		2/20	1440.3		3/20	1409.9
1/21	1436.6		2/21	1439.0		3/21	1409.7
1/22	1436.0		2/22	1437.6		3/22	1409.5
1/23	1437.8		2/23	1436.3		3/23	1409.4
1/24	1442.6		2/24	1435.2		3/24	1409.3
1/25	1444.7		2/25	1433.9		3/25	1409.1
1/26	1445.6		2/26	1432.6		3/26	1409.0
1/27	1446.0		2/27	1431.2		3/27	1408.8
1/28	1446.0		2/28	1429.8		3/28	1408.9
1/29	1445.8		2/29	1428.7		3/29	1410.3
1/30	1445.7					3/30	1411.6
1/31	1447.7					3/31	1412.2

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
4/1	1412.6		5/1	1426.1		6/1	1448.4
4/2	1412.7		5/2	1427.1		6/2	1448.5
4/3	1412.8		5/3	1428.5		6/3	1448.6
4/4	1412.8		5/4	1429.4		6/4	1448.5
4/5	1412.7		5/5	1430.0		6/5	1448.3
4/6	1412.5		5/6	1430.9		6/6	1448.2
4/7	1412.4		5/7	1431.8		6/7	1448.2
4/8	1412.2		5/8	1432.3		6/8	1448.2
4/9	1412.1		5/9	1433.1		6/9	1449.2
4/10	1412.3		5/10	1434.2		6/10	1449.6
4/11	1412.6		5/11	1435.4		6/11	1449.4
4/12	1412.9		5/12	1436.5		6/12	1448.9
4/13	1413.0		5/13	1437.6		6/13	1448.5
4/14	1413.0		5/14	1438.5		6/14	1448.2
4/15	1413.1		5/15	1438.9		6/15	1447.9
4/16	1413.2		5/16	1438.8		6/16	1447.8
4/17	1412.8		5/17	1438.9		6/17	1447.6
4/18	1412.9		5/18	1439.1		6/18	1447.3
4/19	1413.2		5/19	1439.1		6/19	1447.3
4/20	1413.4		5/20	1439.4		6/20	1447.4
4/21	1413.8		5/21	1440.0		6/21	1447.7
4/22	1414.3		5/22	1440.9		6/22	1447.9
4/23	1416.0		5/23	1441.7		6/23	1448.2
4/24	1417.5		5/24	1442.2		6/24	1448.4
4/25	1418.5		5/25	1442.7		6/25	1448.4
4/26	1419.5		5/26	1443.7		6/26	1448.4
4/27	1420.7		5/27	1444.5		6/27	1448.4
4/28	1422.3		5/28	1445.2		6/28	1448.3
4/29	1423.3		5/29	1445.9		6/29	1448.2
4/30	1424.8		5/30	1446.7		6/30	1448.2
			5/31	1447.7			

Appendix 2

Documentation Regarding Spada Lake Reservoir Deviation

SNOHOMISH COUNTY PUD
PUBLIC UTILITY DISTRICT NO. 1

Energizing Life in Our Communities

September 17, 2019

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, 2019

Dear Secretary Bose:

This letter is to notify the Commission of a deviation that occurred at the Public Utility District No. 1 of Snohomish County's (the District) Jackson Hydroelectric Project (Project) related to the target elevation of 1,415 feet msl (defined for the period of August 16 to September 15, 2019) under License Article 406: Spada Lake Water Management. Specifically, on August 28, 2019, the Spada Lake Reservoir dropped below 1,415 feet msl and continued to decline to an elevation of 1,404.9 feet msl on September 15, 2019, the final day of the target elevation. This deviation was the result of abnormally dry weather which severely limited inflows to Spada Lake Reservoir during late spring and throughout summer. The Project has operated at minimum flow levels since May 6, 2019, with the exception of releases for the required outmigration, upmigration and flushing flows (under License Article 416) and whitewater recreation flow (under License Article 412) on May 25, 2019, and September 8, 2019. 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

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 17th day of September, 2019.

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: Tuesday, September 17, 2019 2:17 PM
To: 'Pacheco, James (ECY)'; 'Applegate, Brock A (DFW)'; 'Ford, Jennifer - FS'; 'Janet Curran - NOAA Federal'; 'Asman, Lindsy'; 'Anne Savery'; 'Rustay, Michael'; 'okeefe@americanwhitewater.org'; 'Jim Miller (JMiller@everettwa.gov)'; 'nate.morgan@ci.sultan.wa.us'
Cc: Binkley, Keith
Subject: RE: JHP (FERC No. 2157) - Spada target elevation deviation
Attachments: 20190917 reservoir dip below 1415.pdf

Dear ARC,
Attached is your cc: of the e-filing I will be making regarding the notification below.

Dawn

From: Presler, Dawn
Sent: Tuesday, September 17, 2019 8:05 AM
To: 'Pacheco, James (ECY)' <JPAC461@ECY.WA.GOV>; 'Applegate, Brock A (DFW)' <Brock.Applegate@dfw.wa.gov>; 'Ford, Jennifer - FS' <jford@fs.fed.us>; 'Janet Curran - NOAA Federal' <janet.curran@noaa.gov>; 'Asman, Lindsy' <lindsy_asman@fws.gov>; 'Anne Savery' <asavery@tulaliptribes-nsn.gov>; 'Rustay, Michael' <mike.rustay@co.snohomish.wa.us>; 'okeefe@americanwhitewater.org' <okeefe@americanwhitewater.org>; 'Jim Miller (JMiller@everettwa.gov)' <JMiller@everettwa.gov>; 'nate.morgan@ci.sultan.wa.us' <nate.morgan@ci.sultan.wa.us>
Cc: Binkley, Keith <KMBinkley@SNOPUD.com>
Subject: JHP (FERC No. 2157) - Spada target elevation deviation

Dear ARC,
We dipped below the 1,415 ft msl target (for Aug 16-Sept 15) at Spada Lake Reservoir under license article 406, but it did not impact use of the boat ramp during that time. I will be e-filing a letter with the FERC this afternoon. Please let Keith know if you have any questions. Thanks.

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

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

Project No. 2157-248 -- Washington
Henry M. Jackson (Sultan) Hydroelectric Project
PUD No. 1 of Snohomish County

December 20, 2019

VIA Electronic Mail

Mr. Tom DeBoer
PUD No. 1 of Snohomish County
2320 California Street
P.O. Box 1107
Everett, WA 98206-1107
TADeboer@snopud.com

Subject: Reservoir Elevation Deviation - Article 406

Dear Mr. DeBoer:

This is in response to your report submitted on September 17, 2019, concerning a temporary impoundment water surface elevation deviation at the Henry M. Jackson (Sultan) Hydroelectric Project No. 2157. You submitted the filing pursuant to Article 406 of the license.[1] For the reasons discussed below, we determined that the deviation is not a violation of your license.

License Requirement

Article 406 of the license requires you to operate the Henry M. Jackson Project consistent with the Spade Lake reservoir rule curves as required in the Appendix A,

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

condition 5.2 (A-LA 14). The rule curves divide Spade Lake water elevations into five states that dictate water management and shift throughout the water year (July 1 through June 30). You must maintain a minimum target water surface elevation in Spada Lake Reservoir at or above 1,415 feet mean sea level (msl) from August 16 through September 15. You must modify the minimum target water surface elevations resulting from system emergencies, operating emergencies beyond your control, and for short periods of time upon mutual agreement with the Aquatic Resource Committee.[2] If the impoundment water surface elevation is modified, you must notify the Aquatic Resource Committee and the Commission within two business days after each incident. In addition, you must document the incident in the annual operational compliance monitoring report filed with the Commission pursuant to Article 407, and describe the incident that resulted in the modification of the water surface elevation.

Reservoir Elevation Deviation

In the filing you report that on August 28, 2019, the impoundment water surface elevation at Spada Lake dropped below the required minimum target elevation of 1,415 feet msl and continued to decline to an elevation of 1,404.9 feet msl, on September 15, 2019, the final day of the target elevation. This deviation resulted from unusually dry weather conditions, which severely limited inflows to Spada Lake during late spring and throughout summer. You report that this reduction of water level did not create any adverse environmental impacts, nor did it impact the usability of the boat ramp at the South Fork recreation site. Your filing includes an electronic correspondence dated September 17, 2019, in which you notified the incident to the Aquatic Resource Committee, as required by your license. You did not receive any comments regarding the incident. Furthermore, you indicate that the incident will be documented in the annual operational compliance monitoring report as required by your license.

Conclusion

After reviewing the information provided, we determined that the temporary impoundment water surface elevation deviation that occurred between August 28 through September 15, 2019, at the Henry M. Jackson Project was due to extremely dry weather

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[3] The Aquatic Resource Committee consists of representatives of: 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, the Snohomish County, the City of Everett, the City of Sultan, and the American Whitewater.

conditions and will not be considered a violation of your requirements under Article 406 of the license. The deviation was a result of abnormally low precipitation over an extended period of time and you took necessary actions to protect the reservoir and aquatic resources. You timely notified the Aquatic Resources Committee as required by the license and will include the deviation in the next annual operational compliance monitoring report. Additionally, there were no reported adverse environmental effects due to the incident. Your filing fulfills the reporting requirements of your license.

Thank you for your continued cooperation relative to project operation. If you have any questions concerning this letter, please contact Anumzziatta Purchiaroni at (202) 502-6191 or anumzziatta.purchiaroni@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: Monday, September 14, 2020 9:03 AM
To: Andrew McDonnell; Anne Savery; Brock Applegate; Janet Curran; Jen Ford; Jim Miller; Jim Pacheco; Keith Binkley; Mike Rustay; Nate Morgan; Presler Dawn (E-mail); Tim Romanski; Tom O'Keefe
Subject: JHP (FERC No. 2157) - draft OCMP Annual Report WY19-20 for 30-day review and comment
Attachments: 202010 OCMP DRAFT Annual Report WY 19-20.pdf

Dear ARC Members:
Attached is the DRAFT Operations Compliance Monitoring Plan (OCMP) Annual Report for Water Year 2019-2020 for your 30-day review. Please submit comments, if any, back to me (with cc: to Keith) by October 14, 2020.

Cheers,
Dawn Presler
Sr. Environmental Coordinator
Generation – Natural Resources
Snohomish County PUD No. 1
Everett, WA

(425) 783-1709 (work)