



Energizing Life in Our Communities

October 6, 2023

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 2022 – June 2023 pursuant to License Article 407 for the Jackson Hydroelectric Project. No comments were received on the draft report provided to the Aquatic Resource Committee for a 30-day review and comment period; consultation documentation is included in the report's appendices.

If you have any questions on the report, please feel free to contact me.

Sincerely,

/s/ Keith Binkley

Keith M. Binkley
Natural Resources Manager
KMBinkley@snopud.com
(425) 783-1769

Enclosed: OCMP Annual Report

cc: ARC

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

Operation Compliance Monitoring Plan
(License Article 407)

**Annual Report for Water Year
July 2022 – June 2023**



Prepared By:



Everett, WA

August 2023

FINAL – This document has been prepared by Snohomish PUD. The document may be cited as:

Public Utility District No. 1 of Snohomish County (Snohomish PUD). 2023. License Article 407: Operation Compliance Monitoring Plan Annual Report for Water Year July 2022 through June 2023, for the Henry M. Jackson Hydroelectric Project, FERC No. 2157. August 2023.

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Acronyms and Abbreviations

A-LA	Aquatic License Article
ARC	Aquatic Resource Committee
cfs	cubic feet per second
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
Snohomish PUD	Public Utility District No. 1 of Snohomish County
USGS	United States Geological Survey
WY	Water year

1. INTRODUCTION

Public Utility District No. 1 of Snohomish County (Snohomish PUD) 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. Snohomish PUD 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, Snohomish PUD 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 2022 – June 2023.

A copy of the draft report was provided on August 23, 2023, 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. Deviations from State 3 are included in Appendix 2. Consultation documentation with the ARC regarding the draft report is included in Appendix 3.

2. PROCESS FLOWS

Snohomish PUD provided process flow events pursuant to the Process Flow Plan (PF Plan) on four occasions during the July 2022 – June 2023 timeframe to provide both biological and habitat benefits in each of the three reaches of the lower Sultan River (Figure 1). These included, in chronological order: 1) a flushing of surficial fine sediment from the streambed and an upmigration flow for spawning salmonids in September 2022, 2) a nighttime outmigration flow along with a sediment flushing flow in April 2023, and 3) a daytime juvenile outmigration flow along with a sediment flushing flow (Reach 1) in May 2023. The process flow events for the July 2022 – June 2023 timeframe are summarized, by these reaches, in Table 1. Snohomish PUD 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: <https://www.snopud.com/community-environment/environmental-commitment/stewardship/jackson-fish-program/fish-mgmt-plans/>

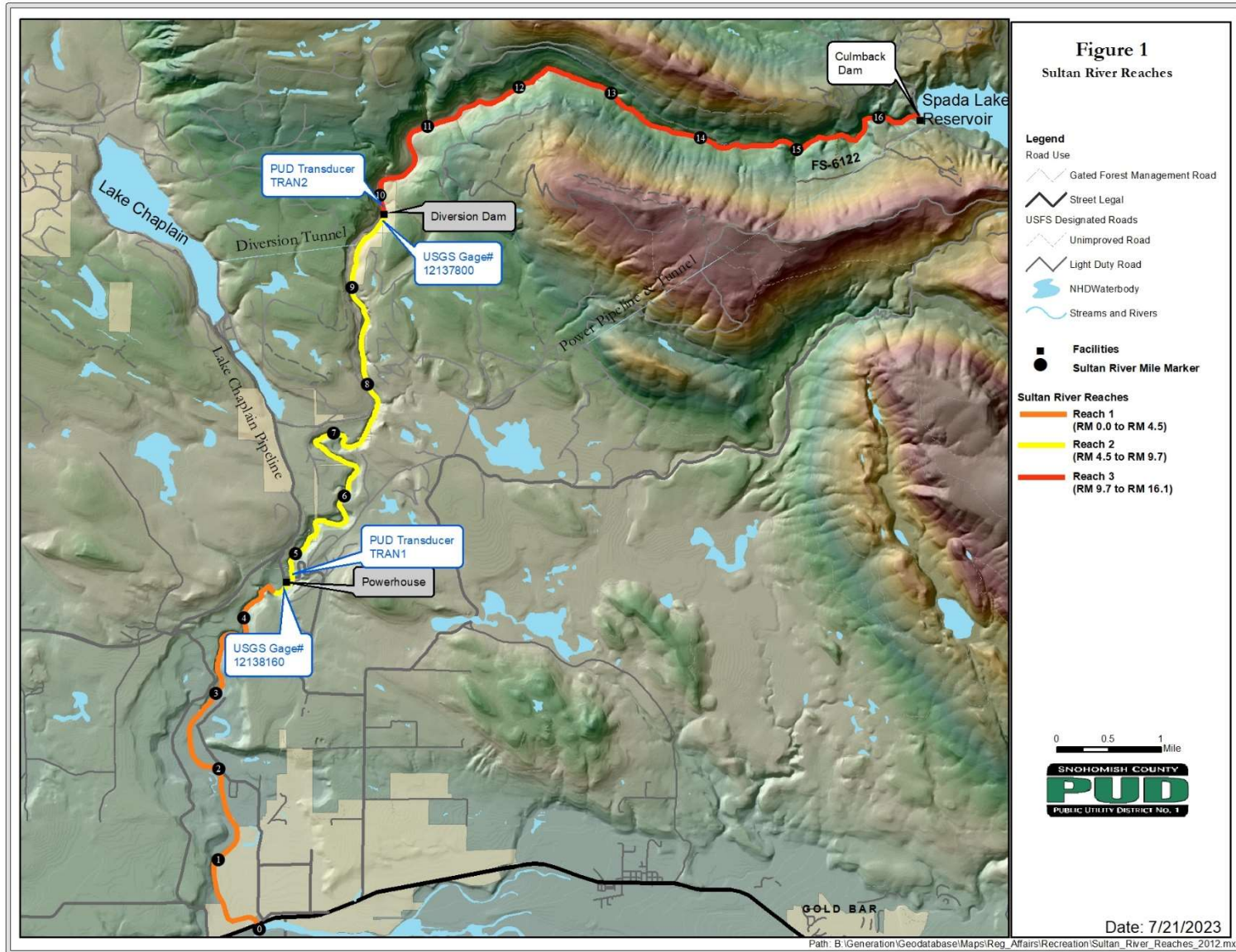


Figure 1. Sultan River reaches.

Table 1. Process Flow Log, July 2022 – June 2023.

Date ¹	Time ²	Magnitude ³ (cfs)	Duration ⁴ (hours)	Accretion ⁵ (cfs)	Notes ⁶	PF Type ⁷
9/25/2022	10:00 to 18:15	R3 – 601 (average), Range 403 – 793	8.25 hours greater than 400 cfs	Estimated at 10 cfs	Reference Figure 97	FL, U
9/25/2022	11:30 to 23:00	R2 – 734 (average), Range 506 – 1,035	11.5 hours greater than 500 cfs	Estimated at 25 cfs	Reference Figure 98	FL, U
9/25/2022	11:45 to 19:30	R1 – 1,293 (average), Range 1,210 – 1,360	7.75 hours greater than 1,200 cfs	Estimated at 25 cfs	Reference Figure 99	FL, U
4/24-25/2023	21:00 to 05:00	R3 – 339 (average), Range 319 – 359	8 hours greater than 200 cfs	Estimated at 175 cfs	Reference Figure 100	O
4/24-25/2023	21:30 to 09:45	R2 – 567 (average), Range 500 to 600	12.25 hours greater than 500 cfs	Estimated at 150 cfs	Reference Figure 101	FL, O
4/24-25/2023	22:15 to 04:30	R1 – 828 (average), Range 811 to 840 cfs	6.25 hours greater than 800 cfs	Estimated at 150 cfs	Reference Figure 102	O
5/2/2023	08:45 to 14:45	R1 – 1,548 (average), Range 1,520 to 1,560 cfs	6 hours greater than 1,500 cfs	Estimated at 35 cfs	Reference Figure 103	FL
5/13/2023	12:30 to 18:30	R1 – 1,436 (average), Range 1,140 to 1,700 cfs	6 hours greater than 800 cfs	Estimated at 70 cfs	Reference Figure 103	O
5/13/2023	12:30 to 18:30	R2 – 929 (average), Range 498 to 1,086 cfs	6 hours greater than 400 cfs	Estimated at 70 cfs	Reference Figure 104	O
5/13/2023	11:15 to 14:15	R3 – 882 (average), Range 708 to 949 cfs	3 hours greater than 600	Estimated at 45 cfs	Reference Figure 105	FL, 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

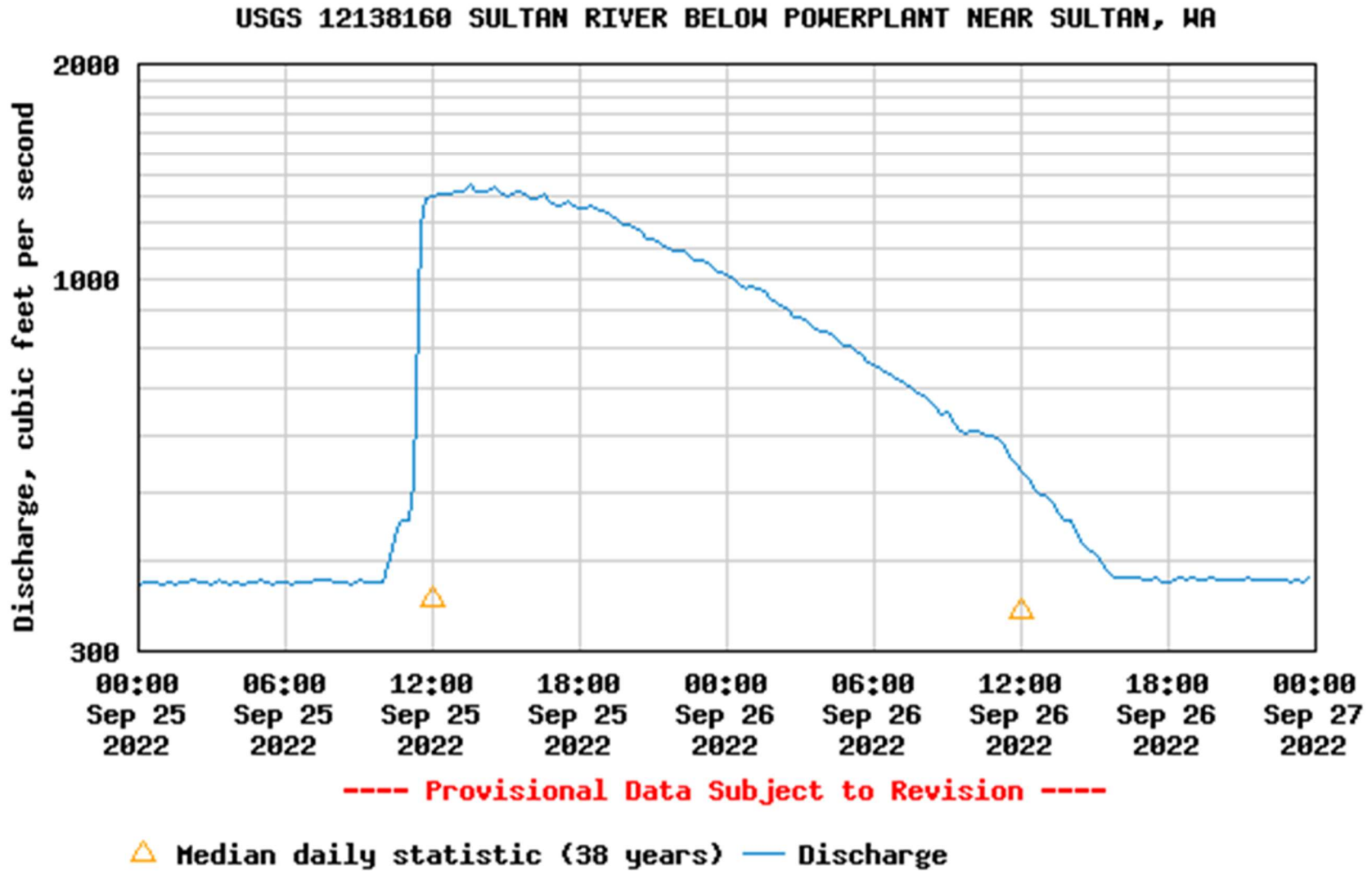


Figure 2. Sultan River immediately downstream of Powerhouse – 09/25/2022.

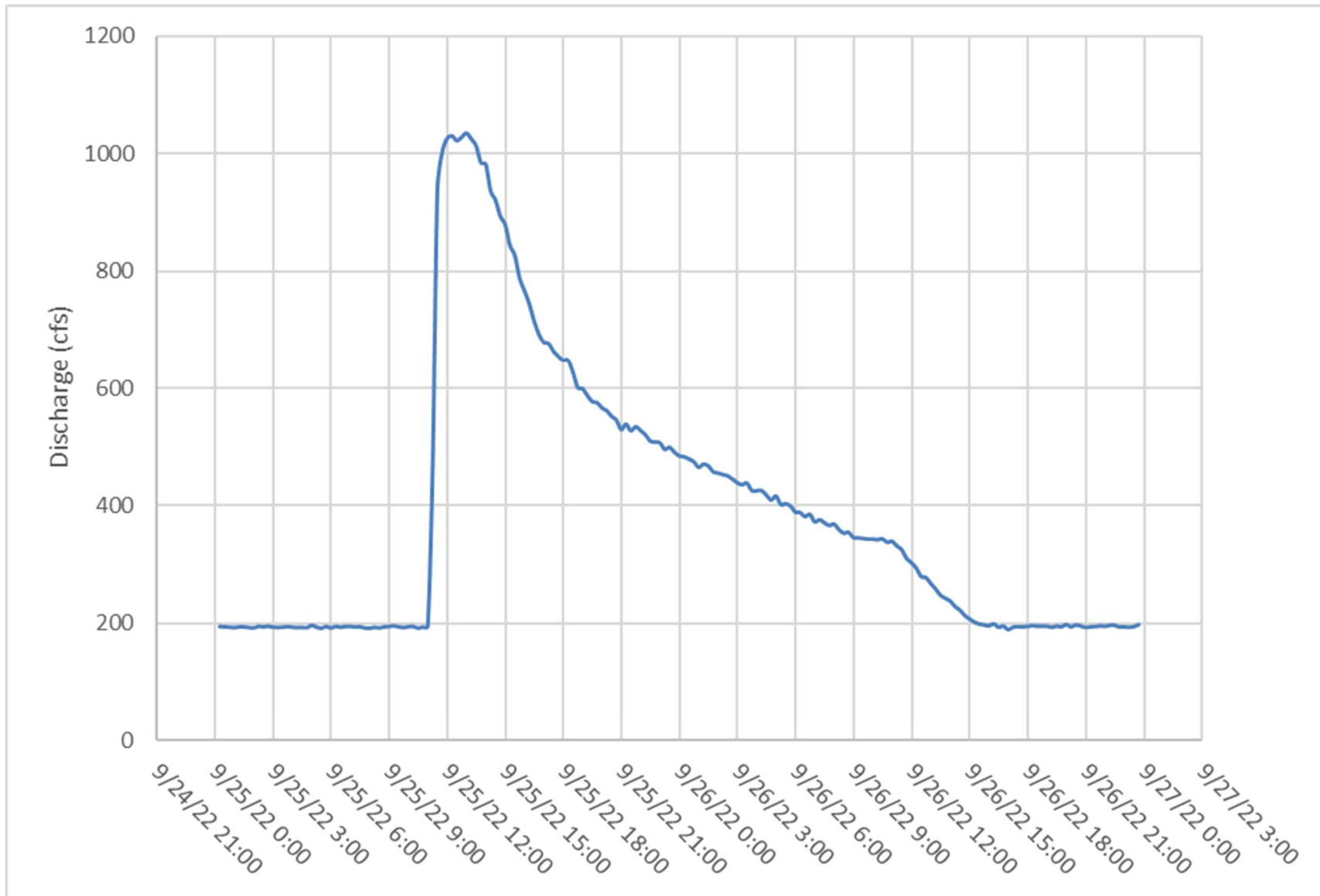


Figure 3. Sultan River immediately upstream of Powerhouse – 09/25/2022.

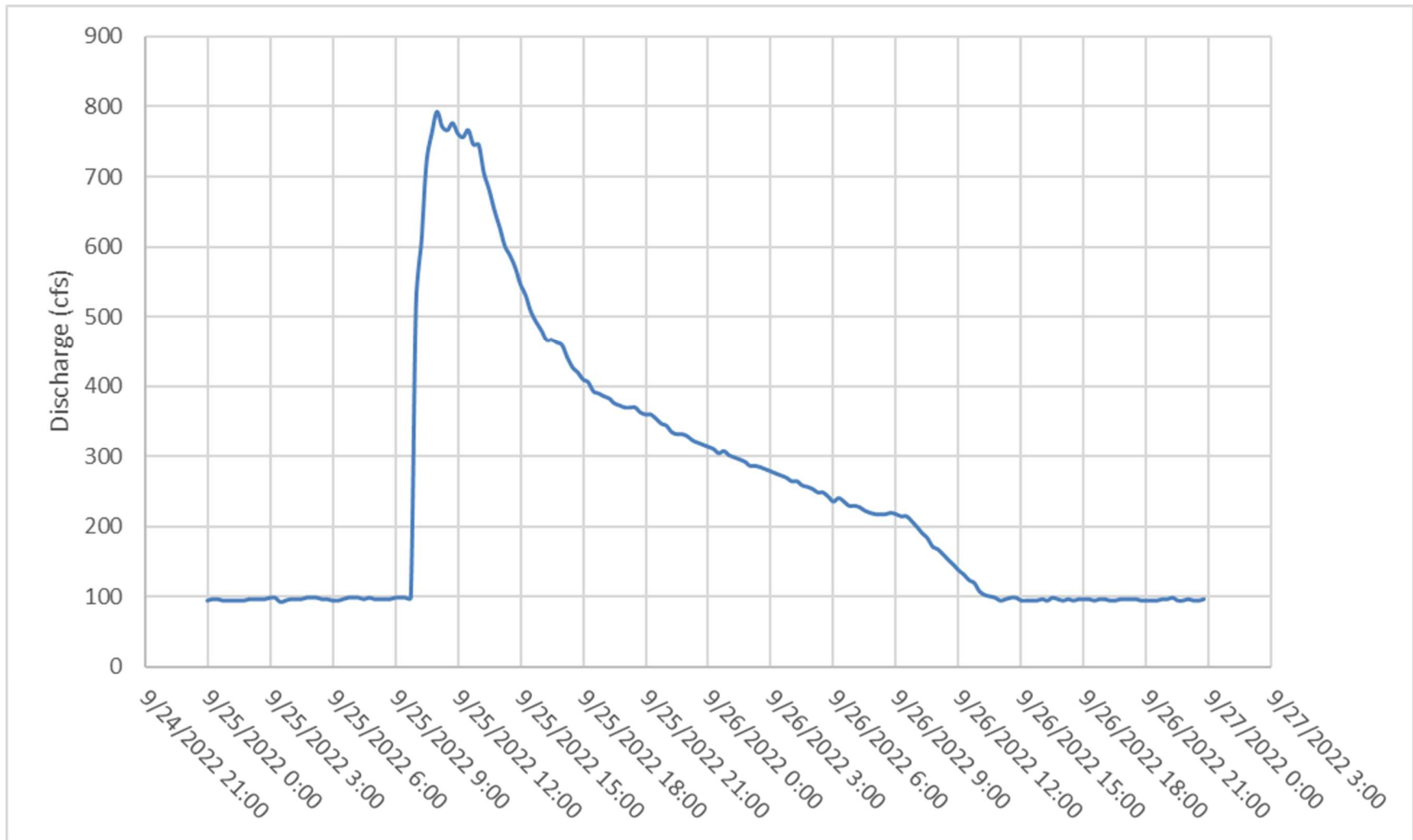


Figure 4. Sultan River immediately upstream of Diversion Dam – 09/25/2022.

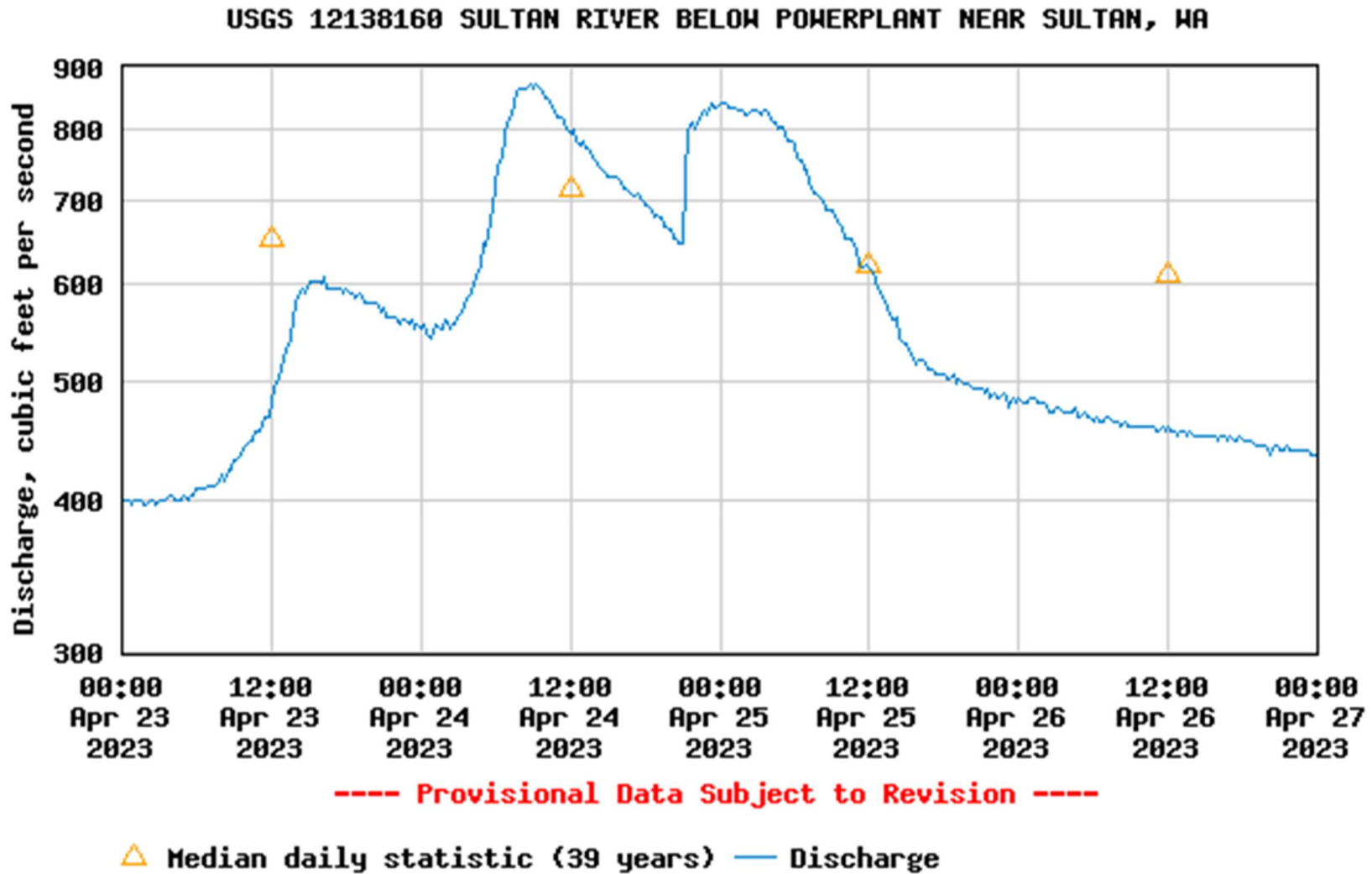


Figure 5. Sultan River immediately downstream of Powerhouse – 4/24-25/2023.

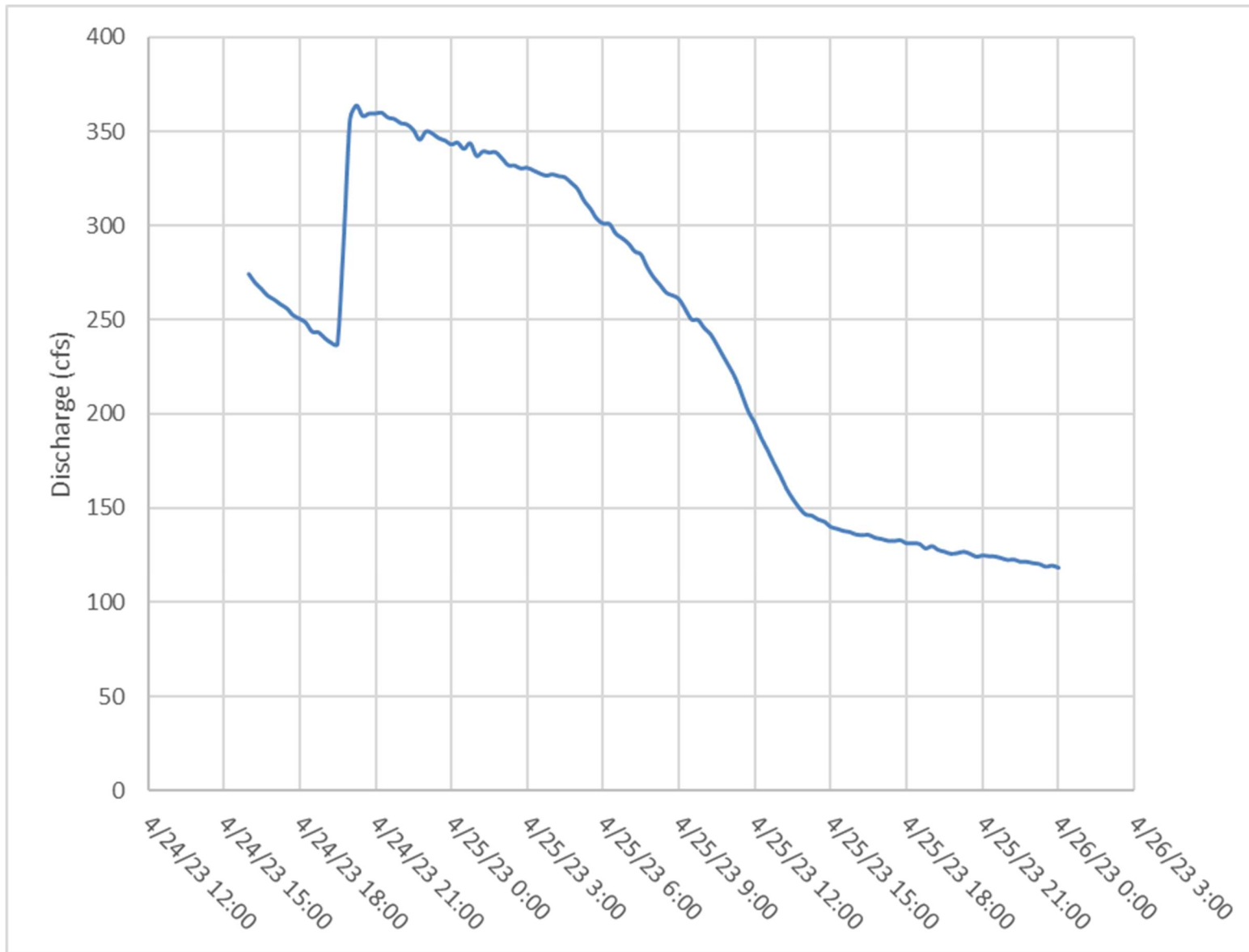


Figure 6. Sultan River immediately upstream of Diversion Dam – 04/24-25/2023.

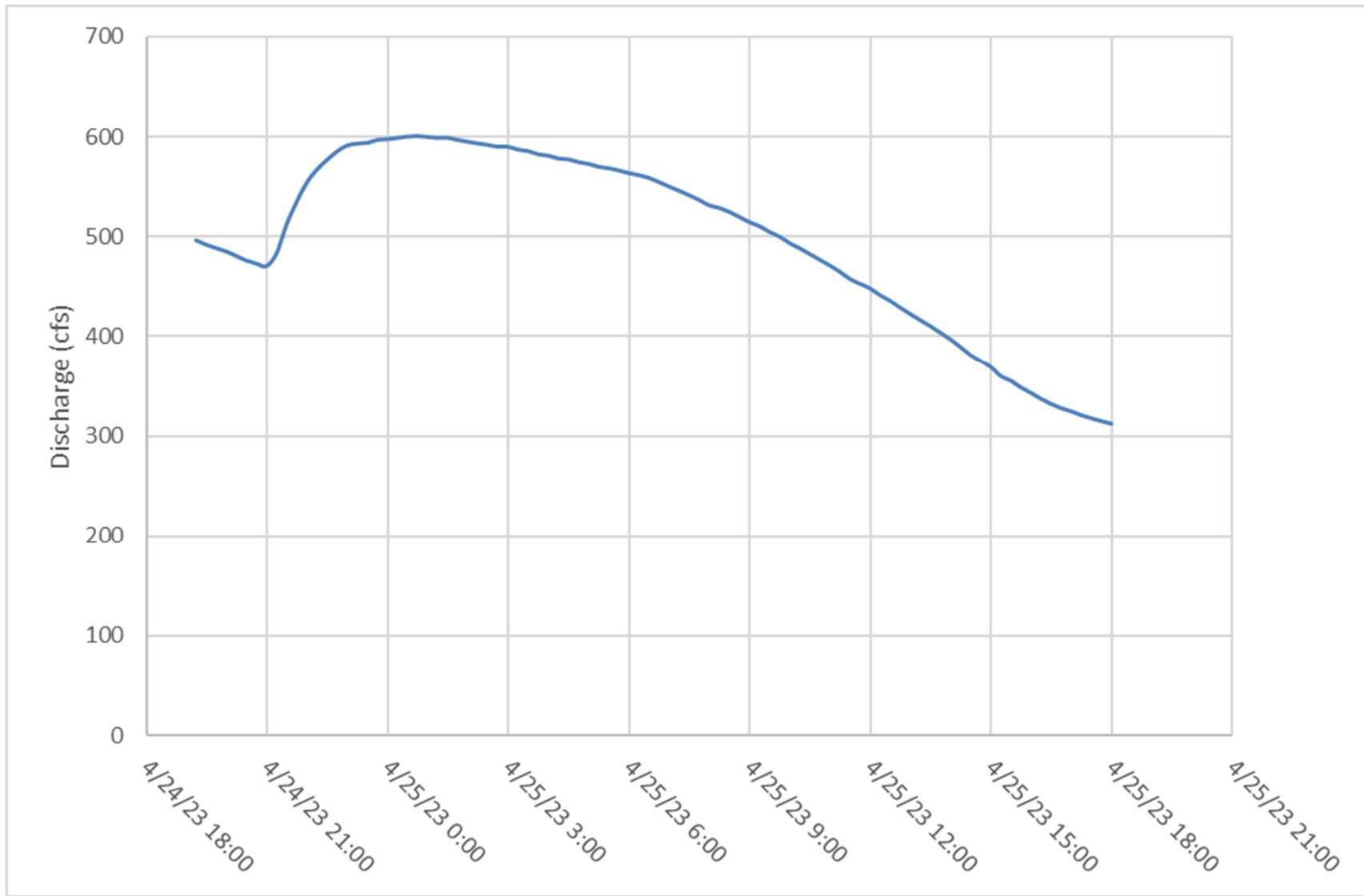


Figure 7. Sultan River immediately upstream of Powerhouse – 04/24-25/2023.

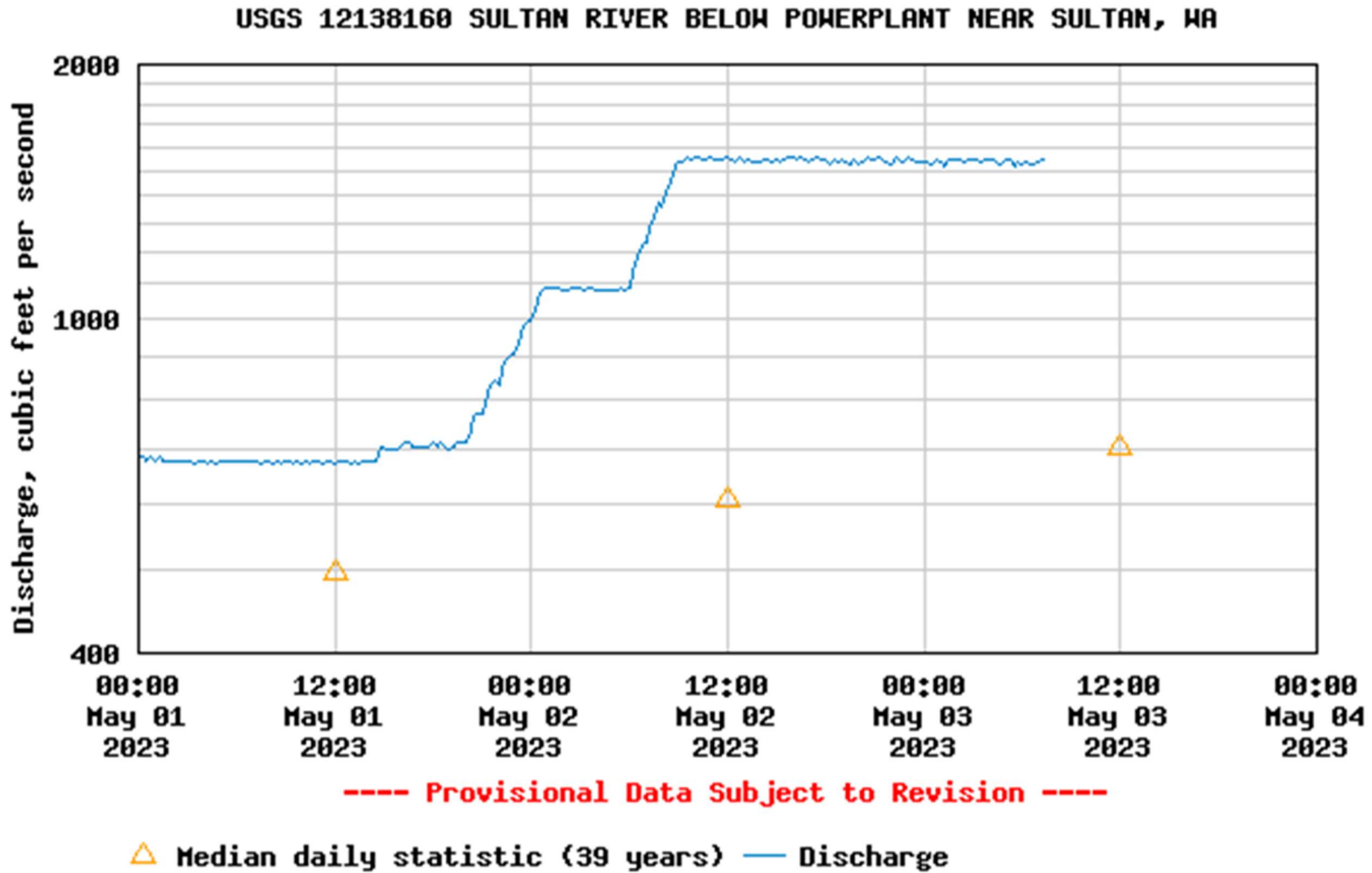


Figure 8. Sultan River immediately downstream of Powerhouse – 05/2/2023.

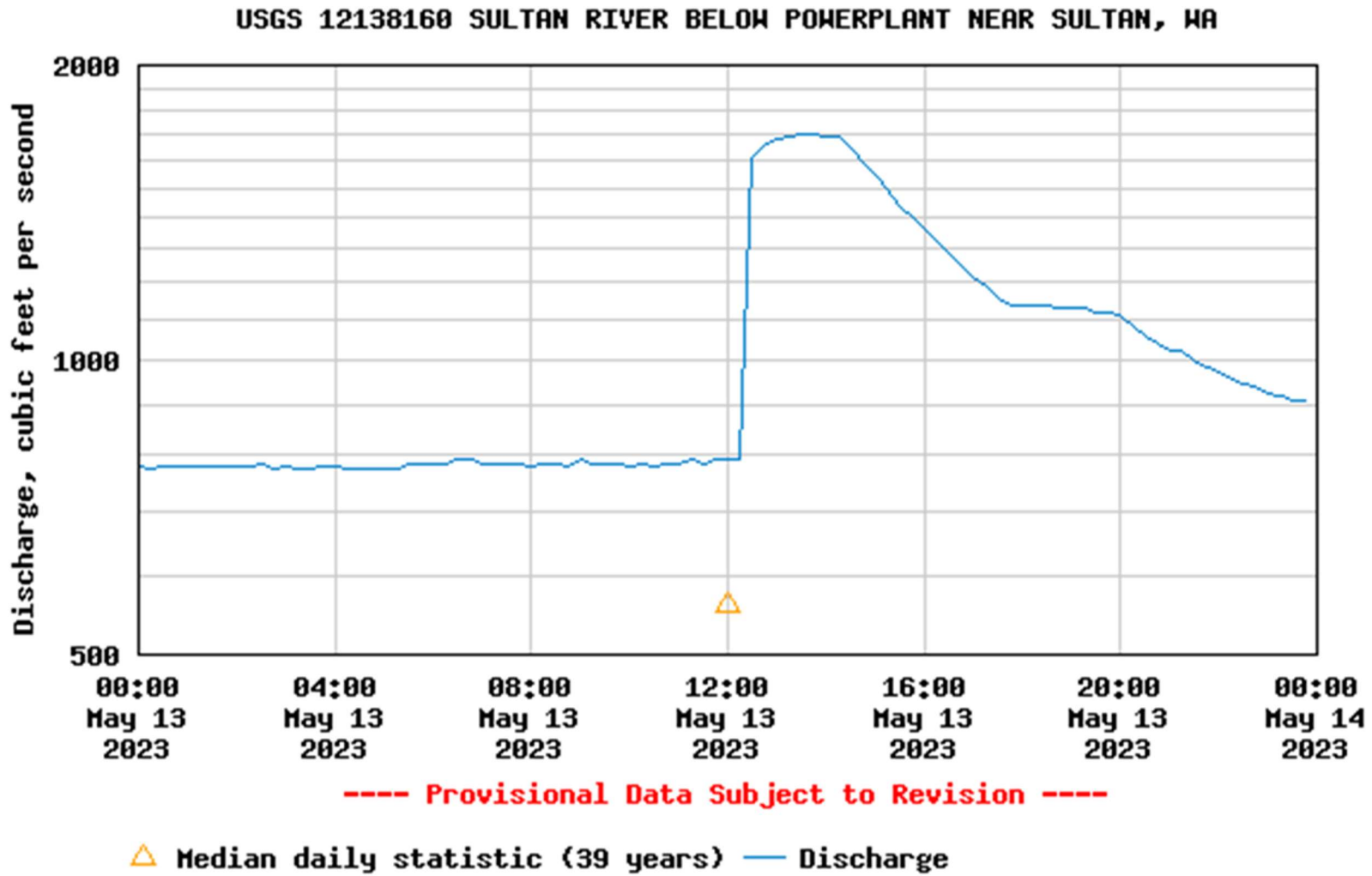


Figure 9. Sultan River immediately downstream of Powerhouse – 05/13/2023.

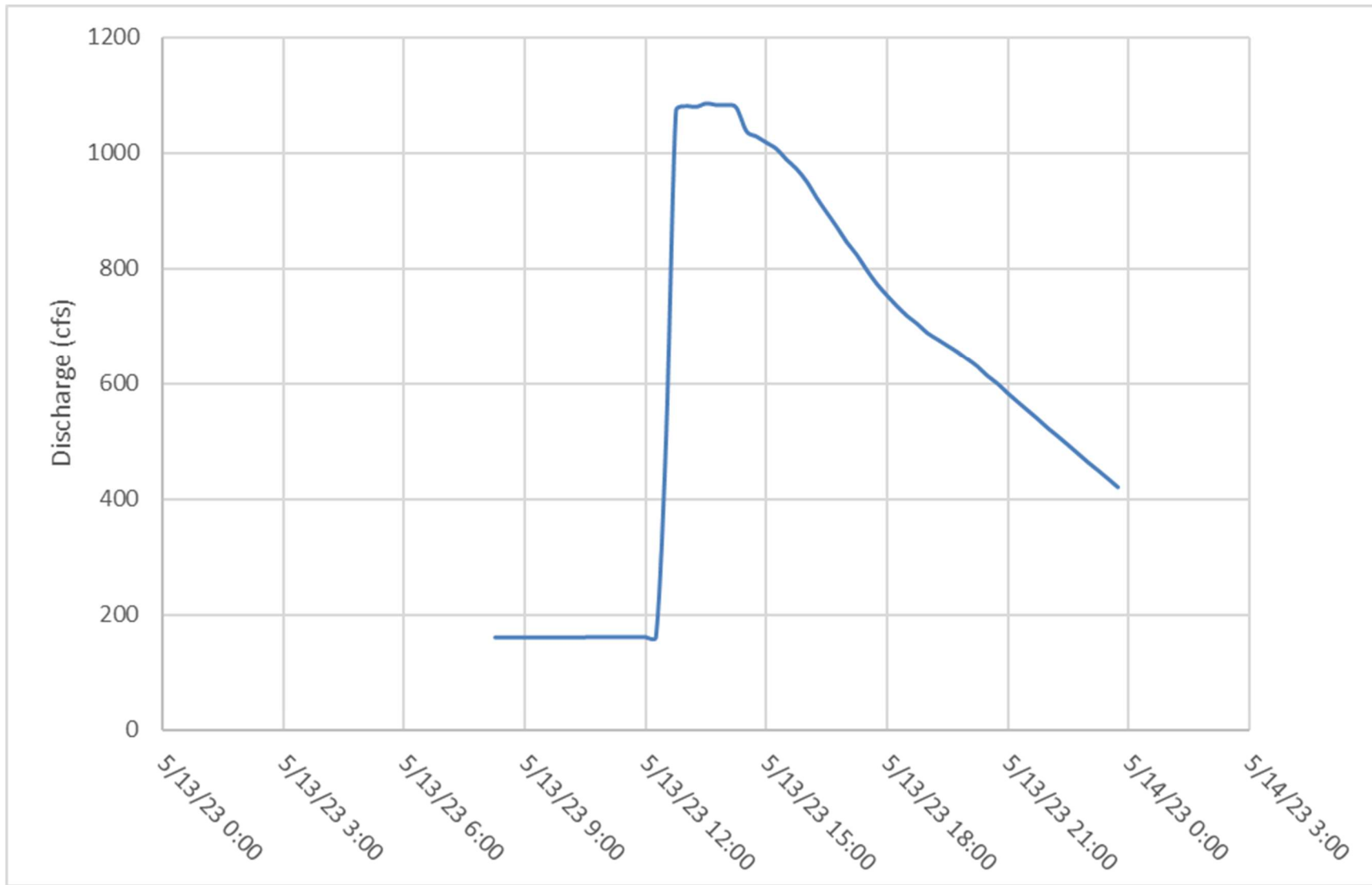


Figure 10. Sultan River immediately upstream of Powerhouse – 05/13/2023.

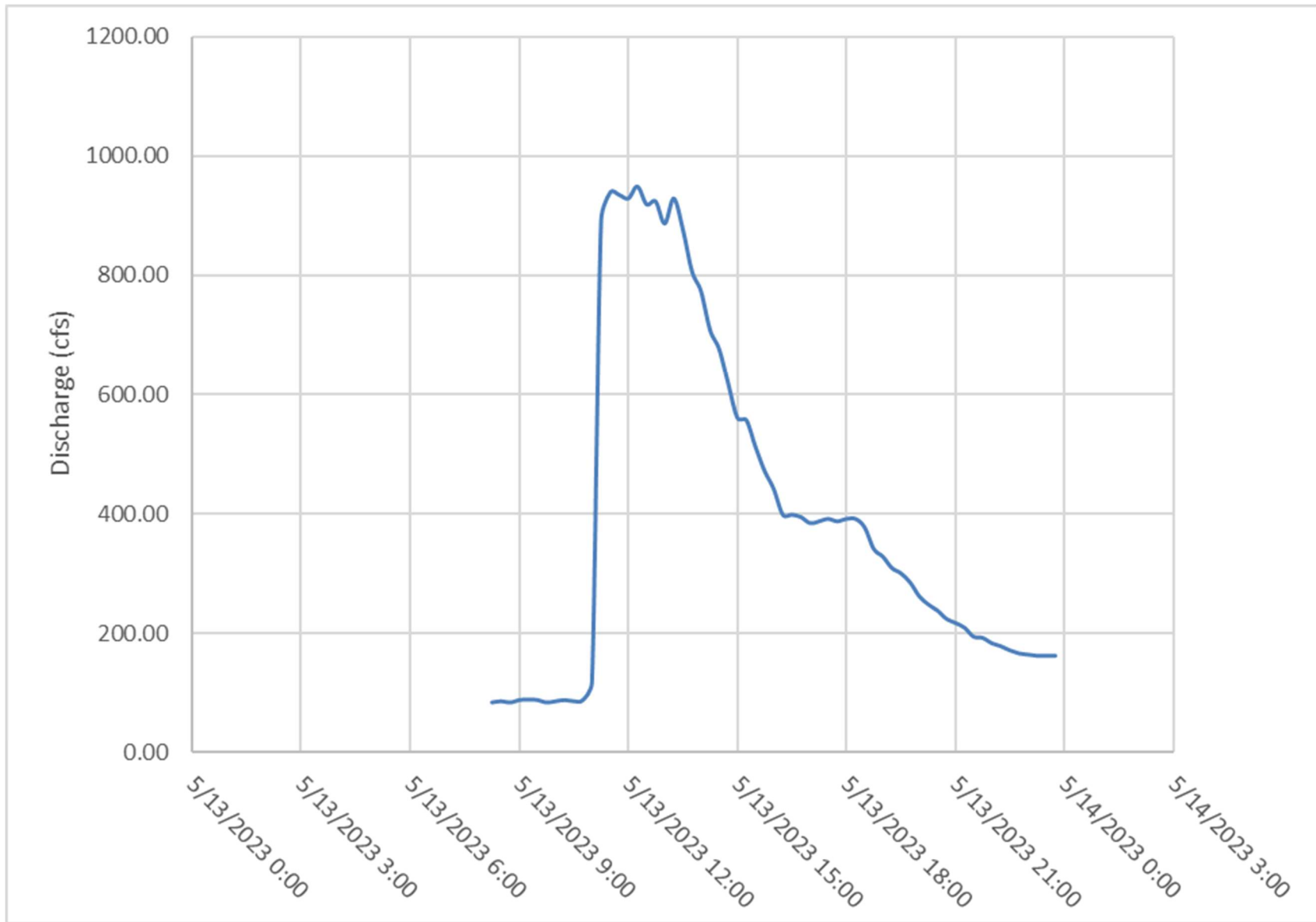


Figure 11. Sultan River immediately upstream of Diversion Dam – 05/13/2023.

3. SPADA LAKE RESERVOIR WATER SURFACE ELEVATIONS

During this reporting period, Spada Lake Reservoir daily water surface elevations ranged between 1,387.5 and 1,448.7 feet msl, with the low on October 27, 2022, and the high on July 4, 2022. Figure 12 displays the daily water surface elevations of Spada Lake Reservoir, and Appendix 1 contains the data in tabular format.

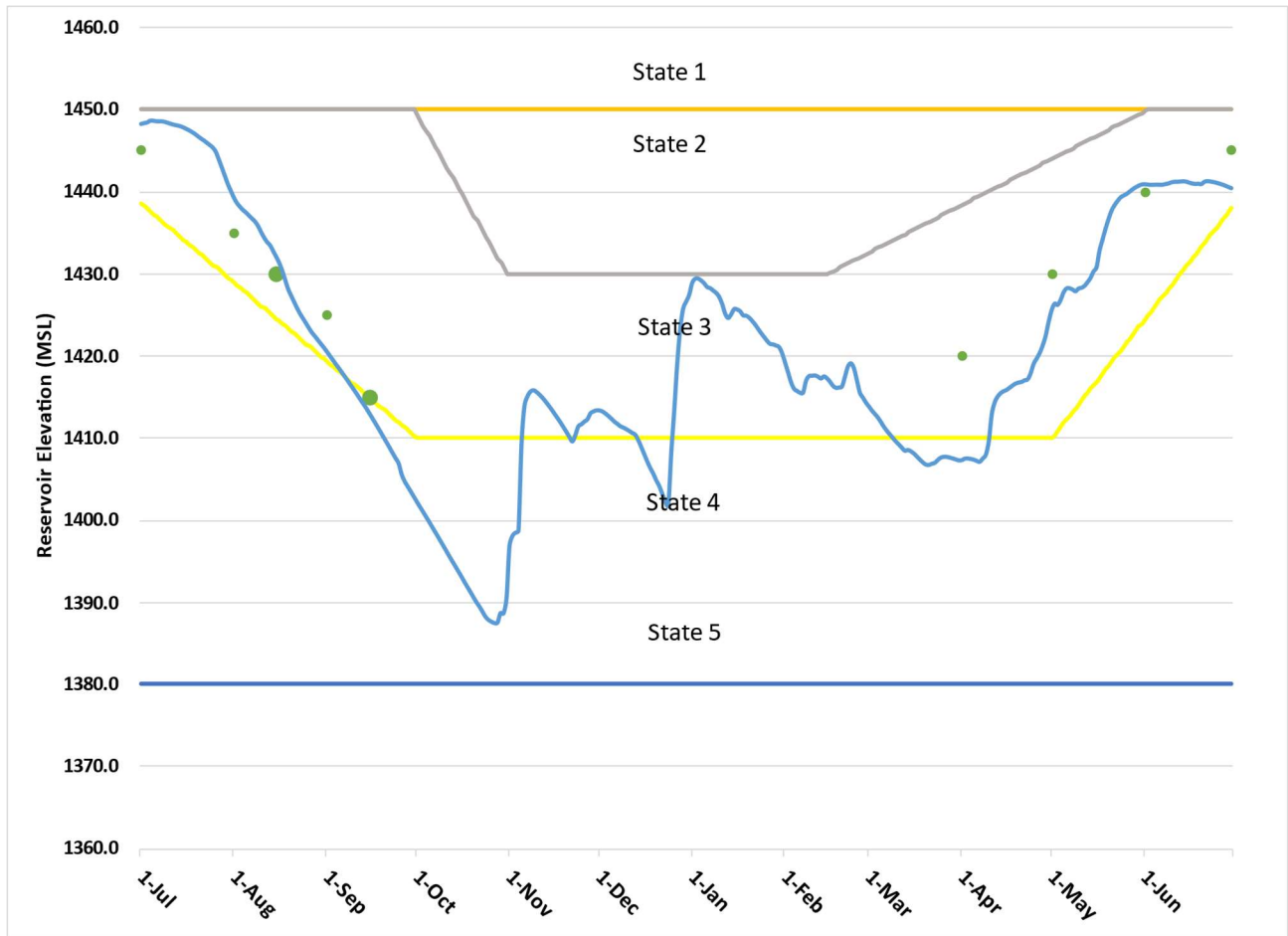


Figure 12. Water surface elevation, Spada Lake Reservoir, July 1, 2022 – June 30, 2023.

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 2022, the water surface in Spada Lake Reservoir dropped below the Project's License Article 406 target elevation of 1,415 feet msl. Specifically, on September 12, 2022, the elevation dropped below 1,415 msl and continue to decline to an elevation of 1,413.2 feet msl on September 15, 2022, the final day of the target elevation.⁹ This deviation was the result of abnormally dry weather which severely limited inflows to Spada Lake Reservoir during throughout the summer. In August, the total monthly inflow to the reservoir averaged well below 100 cfs, approximately 38% of the long-term mean. In its letter dated October 11, 2022, 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.

⁹ Given fluctuations of the reservoir and corresponding oscillations around the target elevation, the Snohomish PUD rounds to the nearest mean daily elevation.

Appendix 1

Spada Lake Reservoir Daily Elevations Tabular Format

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
7/1	1448.3		8/1	1439.3		9/1	1420.6
7/2	1448.4		8/2	1438.7		9/2	1420.1
7/3	1448.5		8/3	1438.2		9/3	1419.5
7/4	1448.7		8/4	1437.8		9/4	1419.0
7/5	1448.7		8/5	1437.5		9/5	1418.5
7/6	1448.6		8/6	1437.1		9/6	1418.0
7/7	1448.6		8/7	1436.8		9/7	1417.5
7/8	1448.6		8/8	1436.4		9/8	1417.0
7/9	1448.5		8/9	1435.9		9/9	1416.5
7/10	1448.4		8/10	1435.2		9/10	1415.9
7/11	1448.3		8/11	1434.5		9/11	1415.4
7/12	1448.2		8/12	1433.9		9/12	1414.8
7/13	1448.1		8/13	1433.5		9/13	1414.3
7/14	1448.0		8/14	1432.9		9/14	1413.8
7/15	1447.9		8/15	1432.2		9/15	1413.2
7/16	1447.7		8/16	1431.5		9/16	1412.6
7/17	1447.5		8/17	1430.5		9/17	1412.0
7/18	1447.3		8/18	1429.4		9/18	1411.3
7/19	1447.1		8/19	1428.3		9/19	1410.7
7/20	1446.8		8/20	1427.4		9/20	1410.1
7/21	1446.5		8/21	1426.7		9/21	1409.5
7/22	1446.3		8/22	1425.9		9/22	1408.8
7/23	1446.0		8/23	1425.2		9/23	1408.2
7/24	1445.7		8/24	1424.6		9/24	1407.5
7/25	1445.4		8/25	1424.0		9/25	1406.9
7/26	1444.8		8/26	1423.4		9/26	1405.6
7/27	1443.9		8/27	1422.9		9/27	1404.7
7/28	1442.9		8/28	1422.4		9/28	1404.1
7/29	1441.9		8/29	1422.0		9/29	1403.5
7/30	1440.9		8/30	1421.5		9/30	1402.9
7/31	1440.1		8/31	1421.1			

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
10/1	1402.3		11/1	1396.9		12/1	1413.3
10/2	1401.7		11/2	1398.1		12/2	1413.0
10/3	1401.1		11/3	1398.5		12/3	1412.7
10/4	1400.5		11/4	1398.7		12/4	1412.4
10/5	1399.9		11/5	1409.2		12/5	1412.0
10/6	1399.3		11/6	1414.0		12/6	1411.8
10/7	1398.7		11/7	1415.1		12/7	1411.5
10/8	1398.1		11/8	1415.7		12/8	1411.3
10/9	1397.5		11/9	1415.9		12/9	1411.1
10/10	1396.8		11/10	1415.6		12/10	1410.9
10/11	1396.2		11/11	1415.3		12/11	1410.6
10/12	1395.6		11/12	1414.9		12/12	1410.4
10/13	1395.0		11/13	1414.5		12/13	1409.8
10/14	1394.3		11/14	1414.0		12/14	1408.9
10/15	1393.7		11/15	1413.5		12/15	1408.1
10/16	1393.1		11/16	1413.0		12/16	1407.2
10/17	1392.5		11/17	1412.5		12/17	1406.4
10/18	1391.8		11/18	1411.9		12/18	1405.7
10/19	1391.2		11/19	1411.4		12/19	1404.9
10/20	1390.6		11/20	1410.8		12/20	1404.2
10/21	1390.0		11/21	1410.2		12/21	1403.2
10/22	1389.5		11/22	1409.6		12/22	1402.3
10/23	1388.9		11/23	1410.4		12/23	1401.8
10/24	1388.2		11/24	1411.5		12/24	1408.2
10/25	1387.9		11/25	1411.7		12/25	1413.4
10/26	1387.6		11/26	1412.0		12/26	1419.1
10/27	1387.5		11/27	1412.3		12/27	1423.4
10/28	1387.5		11/28	1413.0		12/28	1425.8
10/29	1388.7		11/29	1413.3		12/29	1426.7
10/30	1388.7		11/30	1413.4		12/30	1427.5
10/31	1390.5			1413.4		12/31	1428.9

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
1/1	1429.4		2/1	1418.0		3/1	1413.4
1/2	1429.5		2/2	1416.8		3/2	1413.0
1/3	1429.2		2/3	1416.0		3/3	1412.5
1/4	1428.9		2/4	1415.8		3/4	1412.0
1/5	1428.4		2/5	1415.5		3/5	1411.4
1/6	1428.3		2/6	1415.5		3/6	1410.9
1/7	1428.0		2/7	1417.0		3/7	1410.5
1/8	1427.7		2/8	1417.6		3/8	1410.0
1/9	1427.2		2/9	1417.6		3/9	1409.6
1/10	1426.4		2/10	1417.7		3/10	1409.2
1/11	1425.2		2/11	1417.5		3/11	1408.9
1/12	1424.7		2/12	1417.3		3/12	
1/13	1425.1		2/13	1417.5		3/13	1408.5
1/14	1425.7		2/14	1417.3		3/14	1408.6
1/15	1425.7		2/15	1416.9		3/15	1408.4
1/16	1425.5		2/16	1416.4		3/16	1408.1
1/17	1425.0		2/17	1416.1		3/17	1407.8
1/18	1424.9		2/18	1416.2		3/18	1407.4
1/19	1424.7		2/19	1416.3		3/19	1407.1
1/20	1424.3		2/20	1417.5		3/20	1406.8
1/21	1423.9		2/21	1418.8		3/21	1406.7
1/22	1423.3		2/22	1419.1		3/22	1406.9
1/23	1422.8		2/23	1418.5		3/23	1407.0
1/24	1422.3		2/24	1417.0		3/24	1407.4
1/25	1421.9		2/25	1415.5		3/25	1407.6
1/26	1421.5		2/26	1415.0		3/26	1407.7
1/27	1421.4		2/27	1414.4		3/27	1407.7
1/28	1421.3		2/28	1413.9		3/28	1407.6
1/29	1421.1					3/29	1407.5
1/30	1420.4					3/30	1407.4
1/31	1419.2					3/31	1407.3

Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)		Date	Reservoir Elevation (feet)
4/1	1407.3		5/1	1425.6		6/1	1440.9
4/2	1407.5		5/2	1426.4		6/2	1440.9
4/3	1407.5		5/3	1426.3		6/3	1440.9
4/4	1407.5		5/4	1426.9		6/4	1440.9
4/5	1407.4		5/5	1427.8		6/5	1440.9
4/6	1407.2		5/6	1428.3		6/6	1440.9
4/7	1407.1		5/7	1428.3		6/7	1440.9
4/8	1407.5		5/8	1428.1		6/8	1441.0
4/9	1408.0		5/9	1427.9		6/9	1441.1
4/10	1409.6		5/10	1428.2		6/10	1441.2
4/11	1412.9		5/11	1428.3		6/11	1441.3
4/12	1414.4		5/12	1428.6		6/12	1441.3
4/13	1415.1		5/13	1429.0		6/13	1441.3
4/14	1415.5		5/14	1429.5		6/14	1441.3
4/15	1415.7		5/15	1430.3		6/15	1441.3
4/16	1415.9		5/16	1430.8		6/16	1441.1
4/17	1416.2		5/17	1432.9		6/17	1441.0
4/18	1416.4		5/18	1434.2		6/18	1441.0
4/19	1416.7		5/19	1435.5		6/19	1441.0
4/20	1416.8		5/20	1436.7		6/20	1441.0
4/21	1416.9		5/21	1437.7		6/21	1441.2
4/22	1417.1		5/22	1438.4		6/22	1441.3
4/23	1417.2		5/23	1438.9		6/23	1441.3
4/24	1417.9		5/24	1439.4		6/24	1441.2
4/25	1419.1		5/25	1439.6		6/25	1441.1
4/26	1419.7		5/26	1439.8		6/26	1441.0
4/27	1420.4		5/27	1440.0		6/27	1440.9
4/28	1421.3		5/28	1440.3		6/28	1440.8
4/29	1422.5		5/29	1440.6		6/29	1440.6
4/30	1424.2		5/30	1440.8		6/30	1440.5
			5/31	1440.9			

Appendix 2

Documentation Regarding Spada Lake Reservoir Deviation



Energizing Life in Our Communities

September 23, 2022

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 Targets**

Dear Secretary Bose:

This letter is to update/replace the previous letter dated September 16, 2022, regarding a deviation that occurred at the Public Utility District No. 1 of Snohomish County's (Snohomish PUD) Jackson Hydroelectric Project (Project) related to the target Spada Lake Reservoir (Reservoir) elevation of 1,415 feet msl (defined for the period of August 16 through September 15) under License Article 406: Spada Lake Water Management. Specifically, on September 11, 2022, the Reservoir dropped below 1,415 feet msl and continued to decline to an elevation of 1,412.6 feet msl at the end of the day on September 15, 2022. Inflows to the Reservoir during the entire 30-day period were extremely low and reached historic lows on September 10, 2022.

To slow the drafting of the Reservoir and maintain adherence with the elevation targets, Project operations were adjusted on August 26, 2022, further reducing Reservoir outflows while maintaining Sultan River minimum instream flow levels. The reduction in the Reservoir elevation level did not result in adverse environmental impacts, nor did it impact the usability of the boat ramp at the South Fork Recreation Site. 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/ Bradley R. Spangler

Bradley R. Spangler
Senior Manager, Generation
BRSpangler@snopud.com
(425) 783-8151

cc: Aquatic Resources Committee

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.

/s/ Dawn J. Presler

Dawn J. Presler
Sr. Environmental Coordinator
Public Utility District No. 1 of
Snohomish County
2320 California Street
PO Box 1107
Everett, WA 98206-1107
Telephone: (425) 783-1709

Dated: September 23, 2022

Presler, Dawn

From: Presler, Dawn
Sent: Friday, September 23, 2022 1:05 PM
To: Anne Savery; Brock Applegate; jeffrey_garnett@fws.gov; jbailey@everettwa.gov; 'mike.rustay@co.snohomish.wa.us'; 'mkan461@ecy.wa.gov'; nate.morgan@ci.sultan.wa.us; richard.vacirca@usda.gov; okeefe@americanwhitewater.org; 'elizabeth.babcock@noaa.gov'
Cc: Binkley, Keith; Spahr, Scott; Spangler, Brad; Legare, Kyle; Brown, Mark; Spahr, Jessica; chad.brown@ecy.wa.gov
Subject: RE: Jackson Hydro Project: Deviation Notice
Attachments: 20220923 LA406 20220915 deviation updated letter.pdf

Dear ARC Members,

Attached is your cc: of the updated letter that will be e-filed with the FERC shortly. It is updating the reservoir elevation from “to September 15” (end of day September 14) to “through September 15” (end of day September 15). Please let me know if you have any questions.

Wishing you a wonderful weekend.

*Cheers,
Dawn*

From: Spahr, Jessica <JLSpahr@SNOPUD.com>
Sent: Friday, September 16, 2022 5:01 PM
To: Anne Savery <asavery@tulaliptribes-nsn.gov>; Brock Applegate <Brock.applegate@dfw.wa.gov>; jeffrey_garnett@fws.gov; jbailey@everettwa.gov; 'mike.rustay@co.snohomish.wa.us' <mike.rustay@co.snohomish.wa.us>; 'mkan461@ecy.wa.gov' <mkan461@ecy.wa.gov>; nate.morgan@ci.sultan.wa.us; richard.vacirca@usda.gov; okeefe@americanwhitewater.org; 'elizabeth.babcock@noaa.gov' <elizabeth.babcock@noaa.gov>; chad.brown@ecy.wa.gov
Cc: Binkley, Keith <KMBinkley@SNOPUD.com>; Spahr, Scott <SDSpahr@SNOPUD.com>; Spangler, Brad <BRSpangler@SNOPUD.com>; Legare, Kyle <KJLegare@Snopud.com>; Brown, Mark <MEBrown@Snopud.com>; Presler, Dawn <DJPresler@SNOPUD.com>
Subject: Jackson Hydro Project: Deviation Notice

Hello ARC members,

Attached is a notification to be filed with FERC today regarding the Spada Lake Reservoir level. Please contact us with any questions regarding this filing.

Thank you,

Jessica Spahr
Senior Environmental Coordinator
Generation Natural Resources
[Snohomish County PUD](#)

Desk: 425-783-8132
Cell: 206-465-9224
jlspahr@snopud.com

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

Project No. 2157-259—Washington
Jackson Hydroelectric Project
Public Utility District No. 1 of
Snohomish County

October 11, 2022

VIA FERC Service

Mr. Jason Zyskowski
Public Utility District No. 1 of Snohomish County
P.O. Box 1107
Everett, WA 98206

Subject: Reservoir Elevation Deviation - Article 406

Dear Mr. Zyskowski:

Thank you for your letters filed on September 19 and September 23, 2022 in which you notified us of a reservoir elevation deviation at the Jackson Hydroelectric Project No. 2157.¹ As discussed in more detail below, we will not consider the deviation that occurred between September 11 and September 15, 2022, a violation of your license.

License Requirements

Article 406 of your license requires you to maintain a minimum impoundment water surface elevation in Spada Lake above 1,415 feet mean sea level (msl) from August 16 through September 15. This minimum water surface elevation requirement 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, 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, Aquatic Resource Committee). If the impoundment water surface elevation is modified, you shall notify us and the Aquatic Resource Committee within two business

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

days after each such incident. You shall document the modification in the annual operational compliance monitoring report filed with us pursuant to Article 407 and describe the emergency that resulted in the modification of the water surface elevation.

You must also operate the Project consistent with the Spada Lake Reservoir Rule Curves (“Rule Curves”) as described in Forest Service Condition 4(e) A-LA 14. The Rule Curves divide Spada Lake into five states that shift throughout the water year (July through June). You are currently operating in State 4 of the Rule Curves. During this state, you shall operate the Powerhouse to satisfy the requirements of your water supply obligations to the City of Everett and the instream flow requirements of the Sultan River. You shall operate the project to meet your other License Article obligations (including minimum instream flows and process flows) and to conserve water unless inflow forecasts and snowpack measurements indicate higher power production is warranted.

Deviation Incident

In your filings, you state that on September 11, 2022 the reservoir water elevation dropped below the 1,415 feet msl target. Inflows to the reservoir had been extremely low and reached historic lows on September 10, 2022. You noted that project operations were adjusted on August 26, 2022 to slow the drafting of the reservoir, in order to maintain reservoir elevation compliance requirements. The elevation declined to an elevation of 1,412.6 feet msl by the end of the day September 15, 2022. You reported that the reduction in reservoir elevation resulted in no adverse environmental impacts and did not impact the usability of the boat ramp.

Review

Based on our review of the available information, the deviation occurred from September 11 to September 15, 2022 and resulted from low inflows to the reservoir. You notified us and the Aquatic Resource Committee of the deviation within two business days after the incident and justified your reasoning for dropping below licensed limits. Therefore, we will not consider the deviation a violation of your license.

Thank you for your cooperation. If you have any questions regarding this letter, please contact Lindsey Martinez at lindsey.martinez@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 23, 2023 12:33 PM
To: Anne Savery; Anna Thelen (AThelen@everettwa.gov); Brock Applegate; Elizabeth Babcock; Jeff Garnett; Jennifer Bailey; Mike Rustay; Nate Morgan; Richard Vacirca; Scott Bohling; Tom O'Keefe
Cc: Binkley, Keith; McDonnell, Andrew; Legare, Kyle; Brown, Chad (ECY)
Subject: Jackson Hydro (FERC No. 2157) - draft OCMP Annual Rpt for your 30-day review and comment period
Attachments: 202308 OCMP Annual Report WY 22-23 for ARC.pdf

Dear ARC Members,

Attached is the Jackson Hydro Project's draft Operations Compliance Monitoring Plan Annual Report for Water Year 22-23 (July 1, 2022, through June 30, 2023), for a 30-day review and comment. Please provide comments, if any, back to me by Friday, September 22, 2023. Comments indicating concurrence are appreciated too! If you have any questions on the report, feel free to reach out.

Hope you enjoy the final days of summer.

Cheers,

Dawn Presler

Senior Environmental Coordinator
Natural Resources – Generation
Snohomish County PUD
PO Box 1107
Everett, WA 98206-1107

425-783-1709 work

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.

/s/ Dawn J. Presler

Dawn J. Presler
Sr. Environmental Coordinator
Public Utility District No. 1 of
Snohomish County
2320 California Street
PO Box 1107
Everett, WA 98206-1107
Telephone: (425) 783-1709

Dated: October 6, 2023

Presler, Dawn

From: Presler, Dawn
Sent: Friday, October 6, 2023 8:21 AM
To: Anne Savery; Anna Thelen (AThelen@everettwa.gov); Brock Applegate; Elizabeth Babcock; Jeff Garnett; Jennifer Bailey; Mike Rustay; Nate Morgan; Richard Vacirca; Scott Bohling; Tom O'Keefe
Cc: Andrew McDonnell; Keith Binkley; Legare, Kyle; Brown, Chad (ECY)
Subject: JHP (FERC No. 2157) - cc re OCMP Annual Report e-filing with FERC
Attachments: 20231006 to FERC 202308 OCMP Annual Report WY 22-23.pdf

Dear ARC,

Attached is the final Operations Compliance Monitoring Plan Annual Report for Water Year 22-23 for the Jackson Hydro Project that I will be e-filing with FERC this morning. No comments were received from the ARC. If you have any questions regarding the attached, please do not hesitate to contact us.

Cheers,

Dawn Presler, MSIM MSSM (*she/her*)

Sr. Environmental Coordinator
Natural Resources, Generation | Snohomish PUD

O: 425-783-1709 | **C:** 425-725-0745
2320 California Street, Everett WA 98201
www.snopud.com



Note: Emails and attachments sent to and from the PUD are public records and may be subject to disclosure.