



**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, SEATTLE DISTRICT  
4735 EAST MARGINAL WAY SOUTH, BLDG 1202  
SEATTLE, WA 98134-2388

Hydraulics and Coast Branch

SUBJECT: Draft License Application, Seattle City Light, Skagit River Hydroelectric Project  
FERC No. 553

Ms. Kimberly D. Bose  
Secretary, Federal Energy Regulatory Commission  
888 First Street NE  
Washington, D.C. 20426

Dear Ms. Bose:

This submittal represents comments from the U.S. Army Corps of Engineers (USACE) on the Draft License Application for the Skagit River Hydroelectric Project, FERC No. 553, December 2022. These comments are in response to the following language in the Draft License Application (DLA).

Relevant excerpts from the Draft License Application:

Exhibit B- Section 5.4, "At this time, City Light proposes to operate the Project in a manner consistent with the current license (as described in Section 2 of this Exhibit B). Exhibit E of this DLA includes a preliminary list of PME measures to be included in the new license (see Section 3.3.3 for a comprehensive list and Proposed Resource Measures subsections for each resource area in Section 4.2). Many of these PME measures have been developed with input from LPs. City Light continues to engage LPs regarding the PME measures that will be included in the Proposed Action in the FLA. City Light expects that this LP engagement (along with the results of the FERC-approved studies) will result in revisions to these proposed PME measures as well as additional proposed PME measures in the FLA's Proposed Action."

Exhibit E- Section 3.3.3.2, "City Light anticipates including a proposal in the FLA to refine the flood risk management benefits of the Project. City Light is currently engaged in dialogue with the USACE and other LPs and will provide more information on these measures in the FLA."

Recommended flood control (flood risk management) article:

USACE finds that the current license's flood control article (alternatively known as the flood risk management article using the USACE definition) as insufficient and fails to provide adequate flood risk reduction to the Skagit River Basin. Thus, USACE does not recommend that the project be operated in a manner consistent with the current license. USACE instead recommends the following flood risk management article for inclusion in the new license:

The Licensee shall reserve 200,000 acre-feet of storage space in Ross reservoir for flood risk management during the period November 1 through March 15.

The required storage space (defined using USACE terminology as the flood risk management rule curve), if not previously obtained through power or other withdrawals, shall be provided by drawing down the reservoir at a rate equaling or exceeding a uniform drawdown rate from zero on October 1 to a rate that provides 120,000 acre-feet on October 15 and similarly drawing down, but at less rapid rate, to provide the full 200,000 acre-feet on November 1, with the reservoir level at elevation 1,584.7 feet, SCL project datum (1590.9 feet in NAVD 1988 datum). The 200,000 acre-feet of drawdown would be required through March 15, after which the requirement would be relaxed at a uniform rate reaching zero mandated drawdown on April 1.

In situations when the National Weather Service, Northwest River Forecast Center, forecasts that the natural flow at the Skagit River gaging station near Concrete, Washington will equal or exceed 90,000 cubic feet per second (cfs) in 8 hours on a rising stage of a flood, the Licensee shall comply with requests for operational changes at Ross dam (specified outflows) directed by USACE.

If the reservoir pool should reach the elevation of 1,602.5 feet, SCL project datum (1,608.7 feet, NAVD 1988 datum) before the flood recession occurs, the gates shall be operated to produce maximum surcharge storage to gain the maximum reduction of discharge downstream. If surcharge storage is produced it shall be maintained for as long as possible, or until flood recession occurs. After flood recession starts, releases from Ross reservoir shall be increased until discharge equals inflow. Storage shall be evacuated as rapidly as possible without endangering downstream installations as soon as the discharge at Concrete recedes to 90,000 cfs and a falling trend is predicted. USACE will continue to direct operations until the required storage space is provided in Ross reservoir as defined by the flood risk management rule curve.

Thank you for the opportunity to provide comments on the flood control article of the draft license application. USACE acknowledges that all Federal Agencies have certain Tribal Trust obligations, as most recently expressed in the 30 Nov. 2022 Presidential Memorandum on Uniform Standards for Tribal Consultation. In submitting these comments, USACE recognizes that FERC will consider all proposed changes to the license in the context of complying with the Endangered Species Act and its Tribal Trustee obligations.

Please direct any questions regarding this comment to Ken Brettmann at (206) 764-6567 or [kenneth.l.brettmann@usace.army.mil](mailto:kenneth.l.brettmann@usace.army.mil), and to Logan Osgood-Zimmerman at (206) 764-6928 or [logan.j.osgood-zimmerman@usace.army.mil](mailto:logan.j.osgood-zimmerman@usace.army.mil).

Sincerely,

Alexander "Xander" L. Bullock  
Colonel, Corps of Engineers  
District Commander