

FEDERAL ENERGY REGULATORY COMMISSION

Office of Energy Projects

Division of Dam Safety and Inspections - Chicago Regional Office

230 South Dearborn Street, Suite 3130

Chicago, Illinois 60604

(312) 596-4430 Office - (312) 596-4460 Facsimile

In reply refer to: P-2785, P-10809, and P-10810

December 8, 2020

Via Electronic Mail

Mr. David Kepler, President

Four Lakes Task Force

dave@keplertcp.com

Re: Primary Purpose Designations listed in the USACE National Inventory of Dams Database as flood control facilities

Sanford, P-2785;

Secord, P-10809;

Smallwood, P-10810, and

Edenville, -Unlicensed

Dear Mr. Kepler:

By letter dated December 1, 2020, you requested clarification of the Commission's primary purpose designations for the Sanford, Edenville, Smallwood and Secord Projects. The Commission reports primary purpose designations to the U.S. Army Corps of Engineers (USACE) for inclusion in the National Inventory of Dams (NID) database on a yearly basis. In your letter, you say it's your understanding that the four projects were licensed primarily for hydropower and recreation and that any flood control benefits were minor and seasonal in nature.

In 1998, Commission staff issued a multiple-project Final Environmental Assessment (FEA)¹ before issuing licenses for the Edenville, Secord, and Smallwood Projects and amending the existing license for the Sanford Project. In the FEA, staff recommended maintaining a long-standing winter drawdown at each project because they were useful for shoreline owners to maintain their docks, avoid winter ice on structures, avoid shoreline erosion caused by ice and, in part, because of flood benefits. Staff found that, "The flood control benefits of the late-winter drawdown[s] are negligible in true flood situations. However, some benefits are provided, mostly to shoreline residents, by

¹ Notice of Availability of Final Multiple Project Environmental Assessment issued August 14, 1998.

Projects Nos. 10809, 10810, and 2785

minor reductions in the extent and magnitude of spring runoff flows.”² All four licenses for the above projects were issued and/or amended to require the drawdowns along with specific lake levels.

Thus, the Commission’s records show that flood control was considered as one of the reasons for retaining the projects’ winter drawdown, apparently to protect shoreline property owners, but was not the primary purpose of licensing these projects.

We reviewed the information we provided to the USACE for inclusion in the NID database and found that our submittal was consistent with the above purposes. After reviewing the data displayed in the NID database, we contacted the USACE to discuss a discrepancy in the reporting of our data. The database is not reporting the project purpose data in the same order it was submitted. The USACE is investigating an apparent problem in the way the database accepts and displays submitted data and will take any necessary corrective action. The USACE confirmed the order of the data provided is not consistent with the order the data is displayed. We will remain in contact with the USACE to monitor their progress in correcting this problem. Additionally, we can provide a contact for any additional discussion regarding the NID you may want to have with the USACE if necessary.

I hope you find this clarification useful. Please contact me at (312) 596-4430 if you have any questions.

Sincerely,

John A. Zygaj, P.E.
Regional Engineer

Cc: Lee Mueller, lwmueller@boycehydrollc.com

Kayla Stryker, kaylas@fourlakestaskforce.org

Dan DeVaun, DeVaunD@michigan.gov

² FEA at 34 (Section 2.b.I. Flooding).