



December 19, 2014

Via Electronic Submittal (eFile)

Kimberly D. Bose, Secretary  
FEDERAL ENERGY REGULATORY COMMISSION  
888 – 1st Street, N.E.  
Washington, D.C. 20426-0001

**Subject: Yuba River Development Project  
FERC Project No. 2246-065  
Streambed Monitoring Below Englebright Dam Plan**

Dear Secretary Bose:

This letter provides to the Federal Energy Regulatory Commission (FERC or Commission) the Yuba County Water Agency's (YCWA) *Final Streambed Monitoring Below Englebright Dam Plan* (Attachment 1).

### BACKGROUND

In a letter dated October 8, 2013, FERC's Chief (Chief) of the Aquatic Resource Branch of the Division of Hydropower Administration and Compliance (DHAC) directed YCWA to develop two plans to minimize the potential for adverse effects to the fishery in the Yuba River downstream of the United States Army Corps of Engineers' (USACE) Englebright Dam due to operations of YCWA's Narrows 2 Powerhouse, Narrows 2 Partial Bypass (Partial Bypass) and Narrows 2 Full Bypass (Full Bypass),<sup>1</sup> and to file the plans with FERC by January 6, 2015 for approval. The Narrows 2 Facilities are part of YCWA's Yuba River Development Project, FERC Project Number 2246 (Project).

One of the plans required by the Chief in his October 8, 2014 letter is a *Streambed Monitoring Below Englebright Dam Plan* (Plan). Specifically, the Chief states at pages 4 and 6 of his letter:

In addition to developing a plan for one-time modification of the gravel bar,<sup>[2]</sup> the licensee must develop a long-term plan for *streambed monitoring below Englebright Dam*. It should include plans for

<sup>1</sup> For the purpose of this Plan, these three facilities are referred to collectively as the "Narrows 2 Facilities."

<sup>2</sup> The gravel bar referenced in the Chief's letter is the same gravel bar as described in YCWA's March 31 2014 letter filed with FERC. In that letter, YCWA reported to FERC an October 11, 2013 incident where fish were isolated in a small pool (i.e., "existing isolation pool") across from the Narrows 2 Powerhouse that was formed by the gravel bar. YCWA proposed to remove the existing isolation pool and grade the gravel bar, after obtaining the necessary permits and FERC's approval.

monitoring and periodic reporting to the Commission on the reformation of the gravel bar and any other potential stranding locations between Englebright Dam and the Smartsville gage.<sup>3</sup> In addition, the plan should include contingency plans for streambed management to ensure that fish stranding depressions are prevented or removed. The plan should also include a provision for analyzing the potential for fish stranding in the large interstitial spaces along the stream margins after fish leaping, or when flows recede. Finally, the plan should include an implementation schedule that will encompass the remaining period of the current project license and any subsequent annual operating licenses (if necessary). The plan should be developed in consultation with the resource agencies and filed with the Commission within 90 days of the date of this letter.

We are not opposed to the licensee's plans to modify the gravel bar, downstream of the Narrows 2 powerhouse to prevent fish stranding. However, the licensee should first, consult with the resource agencies on its proposal, and obtain any necessary permits to perform this work. Following agency consultation, the licensee should file with the Commission Secretary, its final proposal and a request to begin work. The filing should include a description of the [sic] how the work will be performed, along with a copy of agency comments and permits, and its response to any comments received. [Emphasis added.]

### **PLAN DEVELOPMENT**

In response to the Chief's directive, YCWA drafted the Plan and, on November 13, 2014, provided the draft Plan via e-mail to the United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS), the United States Department of the Interior, Fish and Wildlife Service (USFWS), State Water Resources Control Board (SWRCB), California Department of Fish and Wildlife (Cal Fish and Wildlife), and the Foothills Water Network (FWN) for a 32-day long review and comment period. YCWA reminded the agencies and FWN of the December 15, 2014 due date for comments in an e-mail dated November 22, 2014.

By the close of the comment period, YCWA had received comments on the draft Plan from one agency – SWRCB, which suggested four changes, each of which is discussed below, to the draft Plan.

The first change suggested by the SWRCB was the addition on page 1-7 of an explanation regarding what operations at Narrows 2 Facilities have the potential to create a situation in which fish stranding can occur and a summary of the past stranding incidents. In response, YCWA added on page 1-7 that stranding might occur in association with flow reductions from the

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<sup>3</sup> The United States Geological Survey's (USGS) streamflow gage 11418000, *Yuba River Below Englebright Dam, Near Smartsville*.

Narrows 2 Facilities, and added a reference to YCWA's March 31, 2014 letter to FERC that reported fish stranding incidents, rather than repeating the lengthy contents of the letter in the Plan.

The second change suggested by the SWRCB was that, in Figure 2.3-1 on page 2-19, YCWA categorize the rock for the material it is composed of and not provide an opinion as to its source of the rock. YCWA notes that the figure legend does describe the rock material (i.e., angular rock), so no change is needed to address that portion of the SWRCB's suggestion. YCWA believes YCWA's good faith effort to describe the source of the material is useful in the Plan. This characterization (i.e., YCWA's good faith effort to characterize the source of the material) is included in the introductory paragraph to the figure and YCWA has added the caveat to the figure title. No other change has been made.

The third change suggested by the SWRCB was including in the titles to Figures 3.1-1 and 3.1-2 on page 3-2 the cubic feet per second (cfs) flow as recorded at the Smartsville gage. These figures show the dry gravel bar and isolation pool near the Narrows 2 Facilities during a Narrows 2 outage when no flow was being released from the facilities. Flow at the Smartsville gage is not germane to the photos since the gage records flows downstream of Pacific Gas and Electric Company's Narrows 1 Powerhouse, which was discharging during the Narrows 2 outage. YCWA had added to each figure title that the photo was taken during an outage when no flow was released from the Narrows 2 Facilities. No other change has been made.

The last change suggested by the SWRCB was, when YCWA takes photos related to reformation of the isolation pool, as described on page 4-1, YCWA record flow at the Smartsville gage and release from each Narrows 2 Facility. YCWA agrees, and this has been added to page 4-1.

### FINAL PLAN

*The Final Streambed Monitoring Below Englebright Dam Plan* is included in Attachment 1 to this letter for FERC's consideration. Attachment 1 to the Plan includes documentation of consultation, including YCWA's e-mail to agencies and FWN soliciting comments on the draft plan and the SWRCB's comment letter.

YCWA will implement the Plan as approved by the Commission.

If you have any questions regarding this matter, please contact me.

Sincerely,



Curt Aikens  
General Manager

*Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
December 19, 2014  
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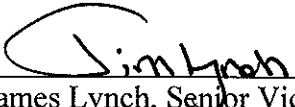
Attachment: 1. Final Streambed Monitoring Below Englebright Dam Plan

cc: Alan Mitchnick - FERC, D.C.  
Ken Hogan, FERC, DC  
Certificate of Service for Parties on FERC's Official Service List for the Yuba  
River Development Project (FERC Project No. 2246-065)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding (Yuba River Development Project, FERC Project No. 2246-065).

Dated in Sacramento, CA this 19<sup>th</sup> day of December, 2014.

  
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James Lynch, Senior Vice President  
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**Yuba River Development Project  
FERC Project No. 2246-065  
Streambed Monitoring Below Englebright Dam Plan**

**ATTACHMENT 1**

***Final Streambed Monitoring Below Englebright Dam Plan***