



December 31, 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  
Narrows 2 Facilities Prioritized Operations and Monitoring Plan**

Dear Secretary Bose:

This letter provides to the Federal Energy Regulatory Commission (FERC or Commission) the Yuba County Water Agency's (YCWA) *Narrows 2 Facilities Prioritized Operations and Monitoring 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 *Narrows 2 Facilities Prioritized Operations and Monitoring Plan* (Plan).<sup>2</sup> Specifically, the Chief states at pages 3 and 4 of his letter:

...the licensee should develop a *prioritized operations and monitoring plan*. The plan should include an operational protocol and feasibility analysis for avoiding use of the partial and full bypasses (discussed below), to the extent possible. In the event that these alternate release locations are utilized, the plan should include detailed protocol for bringing these release points online, including proposed ramping rates for each release project location (Narrows 2 powerhouse, full bypass,

<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 second plan required by the Chief's October 8 letter was a *Streambed Monitoring Below Englebright Dam Plan*. YCWA filed that plan with FERC on December 19, 2014.

and partial bypass). Due to the interrelatedness of the project with the Narrows Project No. 1403, the licensee may consider coordinating plan development with Pacific Gas and Electric Company. Further, the plan should include a monitoring and reporting component, including periodic reporting to the Commission, to determine its effectiveness on avoiding adverse impacts to fishery resources and its continued operational feasibility. 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 coordination with the resource agencies and any applicable stakeholders and filed with the Commission for approval within 90 days of the date of this letter.

...ramping rates and flow management should be further analyzed to avoid fish strandings and mortality between Englebright Dam and the Smartsville gage. Accordingly, the forthcoming operations monitoring plan should include a revised flow management protocol for all project release locations; and to the extent possible, the Narrows Project. [Emphasis added.]

#### **PLAN DEVELOPMENT**

In response to the Chief's directive, YCWA drafted the Plan and, on November 22, 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), USCOE, State Water Resources Control Board (SWRCB), California Department of Fish and Wildlife (Cal Fish and Wildlife), and the Foothills Water Network (FWN) for a 30-day long review and comment period.

As of the date of this letter, YCWA has received no written comments on the draft Plan other than a December 18, 2014 e-mail from Cal Fish and Wildlife stating that it would do its best to review and provide comments on the draft Plan before YCWA filed the Plan with FERC, but Cal Fish and Wildlife may end up just having to provide comments on the Plan that YCWA files with FERC.

#### **FINAL PLAN**

The final *Narrows 2 Facilities Prioritized Operations and Monitoring Plan* is included in Attachment 1 to this letter for FERC's consideration. Attachment 1 to the Plan includes documentation of consultation, including YCWA e-mail to agencies and FWN soliciting comments on the draft Plan, and Cal Fish and Wildlife's December 18, 2014 e-mail. YCWA will implement the Plan as approved by the Commission.

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

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
December 31, 2014  
Page 3

Sincerely,



Curt Aikens  
General Manager

Attachment: 1. Final December 2014 *Narrows 2 Facilities Prioritized Operations and Monitoring 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 31<sup>st</sup> day of December, 2014.

---

James Lynch, Senior Vice President  
HDR Engineering, Inc.  
2379 Gateway Oaks Drive, Suite 200  
Sacramento, CA 95833  
(916) 679-8740