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May 20, 2019

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

Submitted via FERC eFile

Re: Idaho Conservation League's study requests for the Barber Dam Hydroelectric Project, P-4881

Dear Secretary Bose:

The Idaho Conservation League (ICL) submits the following study requests in response to the Federal Energy Regulatory Commission's (FERC's) Requests for Comments and Study Requests for P. 4881.

Since 1973, the ICL has been Idaho's voice for clean water, clean air and public lands—values that are the foundation of Idaho's extraordinary quality of life. ICL works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest statewide conservation organization, we represent members who want to ensure that public resource developments are as respectful and protective of Idaho's natural resources as possible.

ICL actively engages in permitting and project opportunities related to Boise River health including, though not limited to: reviewing and commenting on Clean Water Act permits; participating in the creation of water quality rules; partnering with local governments, NGOs and other stakeholders on river floats, clean up efforts, and riparian restoration projects; and reviewing, and engaging when appropriate, in water right applications.

ICL has reviewed the Pre-Application Document (PAD) submitted by Fulcrum, LLC, and Ada County, and submits the following study requests:

Engineering Study Related to Eliminating or Mitigating Flow Disruptions

ICL drew public attention to the 2015 flow disruption caused by failed operations at the Barber Dam hydro facility, and has consistently monitored Boise River flows since that time. As is reflected in the P-4881 record via letters and comments

submitted by Sawtooth Law Group on behalf of multiple irrigation clients, the Barber Dam has continued to cause flow disruptions.

The relicensing process should include a study regarding engineering or other structural solutions geared at eliminating the cessation and/or abrupt drops in flows caused by the dam. In addition to the providing the reliance on flows that water users and a healthy river require, this study should also investigate fish passage around the dam during flow disruptions.

Fish Passage & Fishery Health Study

The Boise River fishery provides a heightened quality of life to Ada County residents as well as Treasure Valley visitors, and the relationship between dam operations and the fishery should be studied.

While some fish move downstream from the Barber Pool, Barber Dam completely impedes upstream fish passage. If not included within the engineering study referenced above, fish passage options should either be a stand-alone study or incorporated into a larger fishery health analysis.

Additionally, the pooling of shallow water above the dam contributes to increased water temperature in reaches below the dam. This and other water quality concerns should be analyzed as they relate to the health of the Boise River fishery.

ICL acknowledges the technical expertise of the Idaho Dep't of Fish & Game (IDFG) on these matters, and directs FERC to IDFG's May 17, 2019 comment letter including its suggested studies.

Recreation Use and User Preference Study

As reflected in the PAD, Ada County is rapidly growing and outdoor recreation is an integral component of the community. Recreation impacts are certain to continue and increase in this reach of the Boise River. ICL requests a study measuring the amount, type, and patterns of recreational use in the Barber Pool, around the dam, and the reach below the dam. For more detail, please see the same study as requested by the Idaho Parks & Recreation in its May 17, 2019 comment letter.

Thank you for the opportunity to submit these study requests and for taking them seriously. We look forward to continued engagement in this relicensing in efforts to improve the health of the Boise River in the face of multiple uses and stresses.

Please keep ICL on the notice and service list for this project.

Sincerely,

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