

**Central Rivers Power****Fulcrum, LLC**

Subsidiary of Central Rivers Power US, LLC  
670 N. Commercial Street, Suite 204  
Manchester, NH 03101

**Via eFiling**

June 21, 2022

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

Re: **Barber Dam Hydroelectric Project (FERC No. 4881-031);  
Response to Deficiency of Final License Application**

Dear Secretary Bose:

On November 30, 2021 Fulcrum, LLC and Ada County, Idaho ("Licensees"), Licensees for the Barber Dam Hydroelectric Project ("Project"), submitted their *Application for New License for Major Project – Existing Dam* for the Barber Dam Hydroelectric Project (FERC No. 4881) ("Application") to the Federal Energy Regulatory Commission ("Commission"). On April 22, 2022 the Commission issued a "Deficiency of Final License Application" letter to the Licensees, which also requested filing of Additional Information. Filed herewith are the Licensees' responses to Schedule A – Deficiencies of the Commission's April 22, 2022 letter.

In accordance with the Commission's Order No. 630 (68 FR 9857), the Single Line Electrical Diagram included in Exhibit A contains Critical Energy Infrastructure Information (CEII) and is being submitted as such for the Commission's non-public file. This document contains sensitive and detailed engineering information that, if used incorrectly, may compromise the safety of the Project and those responsible for its proper operation. Members of the public requesting CEII information for the Project must comply with the Commission's procedures for obtaining access to CEII as required under CFR §388.113. All public requests for CEII should be made to the Commission's CEII Coordinator.

Please do not hesitate to contact me at (978) 935-6039 or [kwebb@centralriverspower.com](mailto:kwebb@centralriverspower.com) if you have any questions concerning the attached response.

Sincerely,  
**Fulcrum, LLC**

Kevin M. Webb  
Licensing Manager

cc: R. Osteen, Esq., HSE  
M. Stanley, CRP  
L. Jorgensen, Esq., Ada County  
T. Sorensen, Barber Pool Hydro, LLC  
N. Josten, GeoSense LLC  
Stakeholder Distribution List

BARBER DAM HYDROELECTRIC PROJECT - FERC NO. P-4881

DEFICIENCIES

*RESPONSE TO FERC LETTER DATED 4/22/2022*

PREPARED BY:

GEOSENSE LLC  
IDAHO FALLS, ID

PREPARED FOR:

FULCRUM, LLC  
SUBSIDIARY OF CENTRAL RIVERS POWER, LLC  
670 N. COMMERCIAL STREET, SUITE 204  
MANCHESTER, NH 03101  
TELEPHONE: (603) 623-8222

ADA COUNTY  
BOARD OF COUNTY COMMISSIONERS  
200 W. FRONT STREET, ROOM 3255  
BOISE, IDAHO 83702  
TELEPHONE: (208) 287-7000

MAY 2022

## SCHEDULE A – DEFICIENCIES

### 1 PUBLIC NOTICE

*Section 4.32(b)(6) of the Commission’s regulations requires an applicant to publish notice twice of the filing of its application, no later than 14 days after the filing date, in a daily or weekly newspaper of general circulation in each county in which the project is located. On December 27, 2021, the applicant filed proof that a newspaper notice was published once on December 12, 2021. However, there is no proof that a newspaper notice was published a second time. Please file proof of publication in a newspaper of a second notice of the filing of the license application.*

The second public notice was published on 5/12/2022. The subsequent proof of publication was filed with FERC on 5/13/2022.

### 2 DESCRIPTION OF DRAINAGE AREA

*Section 4.61(c)(1)(vii) of the Commission’s regulations requires that the Exhibit A provide a description of the drainage area at the project site. This information was not included in the Exhibit A; therefore, please revise the Exhibit A to describe the drainage area.*

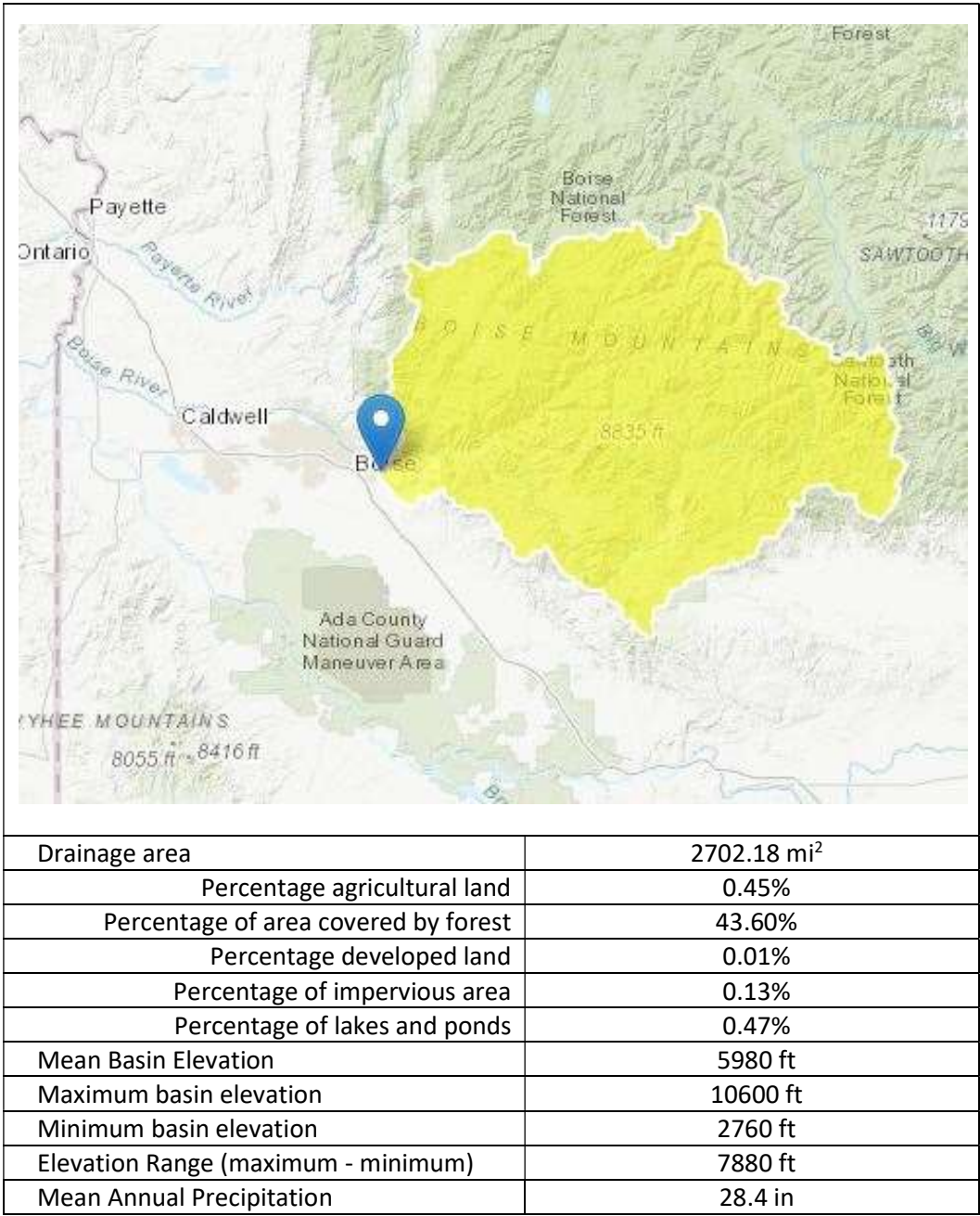
Add the following item “A-7.6 Description of Drainage Area” to Exhibit A of the FLA<sup>1</sup>:

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<sup>1</sup> A copy of the fully revised Exhibit A will be filed by July, 21, 2022. It will include these responses to the FERC deficiencies and responses to FERC’s additional information requests.

A-7.6 DESCRIPTION OF THE DRAINAGE AREA

See the map and graph below for information on the project drainage area.



### 3 ANNUAL INSURANCE COST

*Section 4.61(c)(7) of the Commission's regulations states that Exhibit A must list annual operation and maintenance expenses, including insurance, and administrative and general costs. The Exhibit A does not include the insurance cost. Please revise the Exhibit A to include this information.*

Replace item "A-7.3 Estimated Costs" of Exhibit A of the FLA with the following<sup>1</sup>:

#### A-7.3 ESTIMATED COSTS

The remaining undepreciated net investment, or book value of the project, is \$500,000. The average annual operations and maintenance costs of the project are estimated in the table below:

|  | Annual Cost |
|--|-------------|
| Operations and Maintenance               | \$165,504   |
| Insurance                                | \$18,830    |
| Administrative, Taxes, and General Costs | \$44,831    |
| Total:                                   | \$229,165   |

### 4 SINGLE-LINE ELECTRICAL DIAGRAM FILING

*Section 4.61(c)(8) of the Commission's regulations requires that the Exhibit A include a detailed single-line electrical diagram. The single-line electrical diagram was filed as part of the Exhibit F as Critical Energy Infrastructure Information. Please provide this information in the final license application Exhibit A.*

See attached Exhibit A: Single-line Electrical Diagram, filed as Critical Energy Infrastructure Information.

### 5 MEASURES TO PROTECT ENVIRONMENTAL RESOURCES

*Section 4.61(d)(2)(ii) of the Commission's regulations requires that the license application include an explanation of the specific measures proposed by the applicant, the agencies, and others to protect and enhance environmental resources and values and to mitigate the adverse effects of the project on such resources. The applicant must explain its reasons for not undertaking any measures proposed by any entity consulted.*

*In its October 24, 2021 comments on the draft license application, the Boise River Enhancement Network recommends a trash can or other disposal facility for monofilament fishing line and fishing hooks to reduce wildlife mortality at the portage trail. However, the final license application does not respond to this recommendation. Therefore, please explain whether you agree to undertake the measure and if not, why not.*

The licensees agree that a trash can would be beneficial to the environmental resources in the project area and will include one in their conceptual design drawing for the portage trail take-out. This design will be filed by July 21, 2022 in response to Schedule B of FERC's letter to the licensees dated April 22, 2022.

## 6 EXHIBIT G LAND OWNERSHIP

*Section 4.41(h)(4) of the Commission's regulations requires that for Non-Federal Lands, the Exhibit G maps must identify by legal subdivision: (i) lands owned in fee by the applicant and lands that the applicant plans to acquire in fee; and (ii) lands over which the applicant has acquired or plans to acquire rights to occupancy and use other than fee title, including rights acquired or to be acquired by easement or lease.*

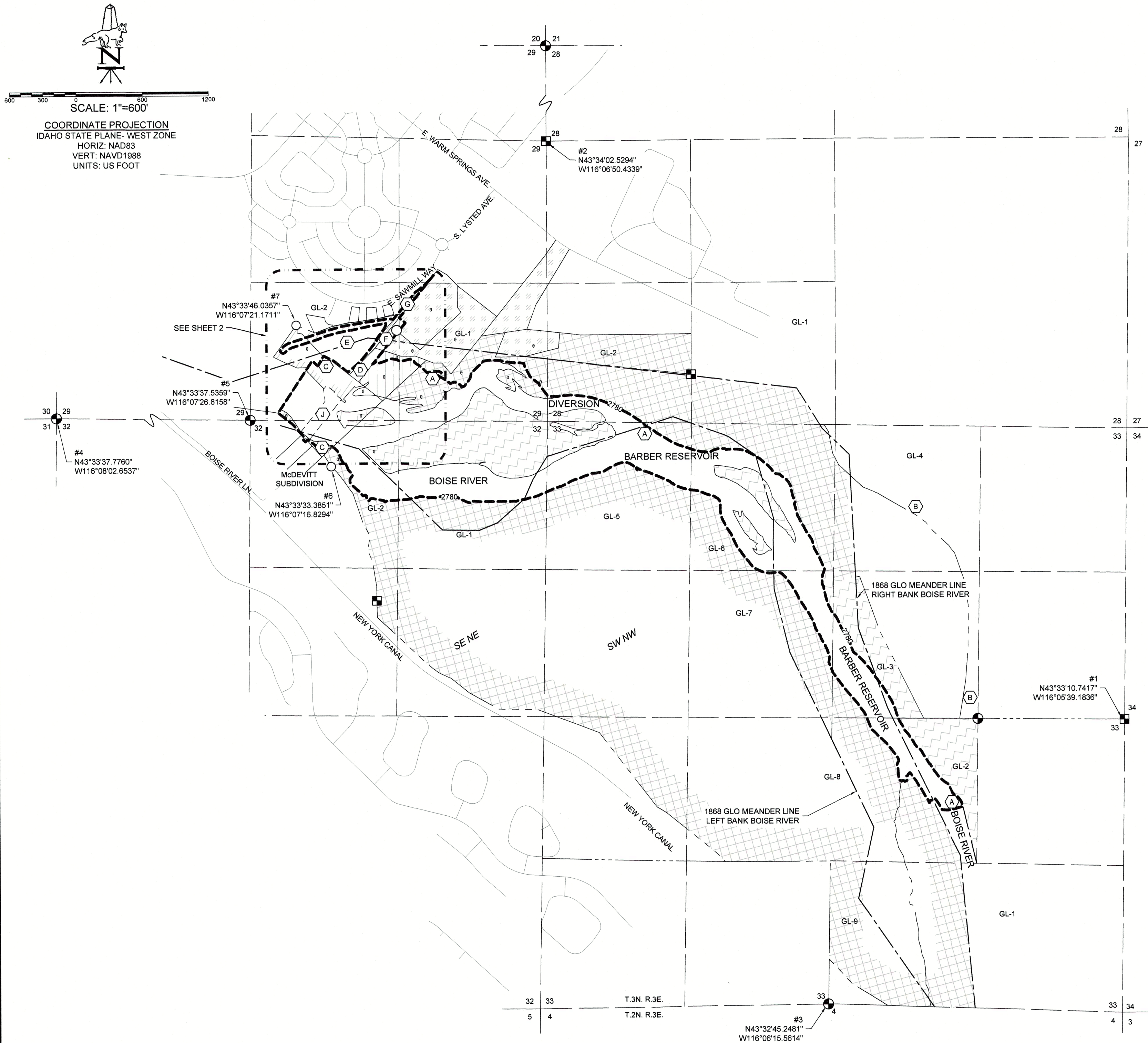
*Exhibit G identifies lands immediately surrounding the dam and powerhouse as owned by Ada County and lands held by the co-licensee's through easements in the vicinity of the constructed project features. The project boundary extends approximately 1 mile upstream along the 2,780 ft. elevation contour around the project impoundment. Aerial images of the project show that the project boundary encloses lands along the impoundment shoreline as well as several islands located within the impoundment. However, Exhibit G does not identify land ownership of some of the shoreline lands. For example, the Exhibit G does not identify the lands upstream of the Ada County parcel along the northern reservoir shoreline, or any of the islands within the project boundary, nor does it indicate whether the licensee owns the lands in fee title or has acquired rights to occupy and use the lands by easement or lease. Please revise Exhibit G to identify ownership of all lands within the project boundary by legal subdivision, including the river islands. Additionally, for those lands not owned by the co-licensees, please describe all rights that have been obtained to occupy and use lands within the project boundary.*

See Revised Exhibit G (Appendix A). The Revised Exhibit G identifies the ownership and Licensees' rights to lands within the project boundary upstream of the Ada County parcel along the northern reservoir shoreline, including the islands within the project boundary. In addition, in response to Schedule B, item 16 of the FERC's April 22, 2022 letter, the project boundary has been moved laterally 10 feet from the northerly and westerly powerhouse security fence, to ensure that the boundary contains all of the downstream portage trail. This area is located on lands owned by Ada County.

# APPENDIX A

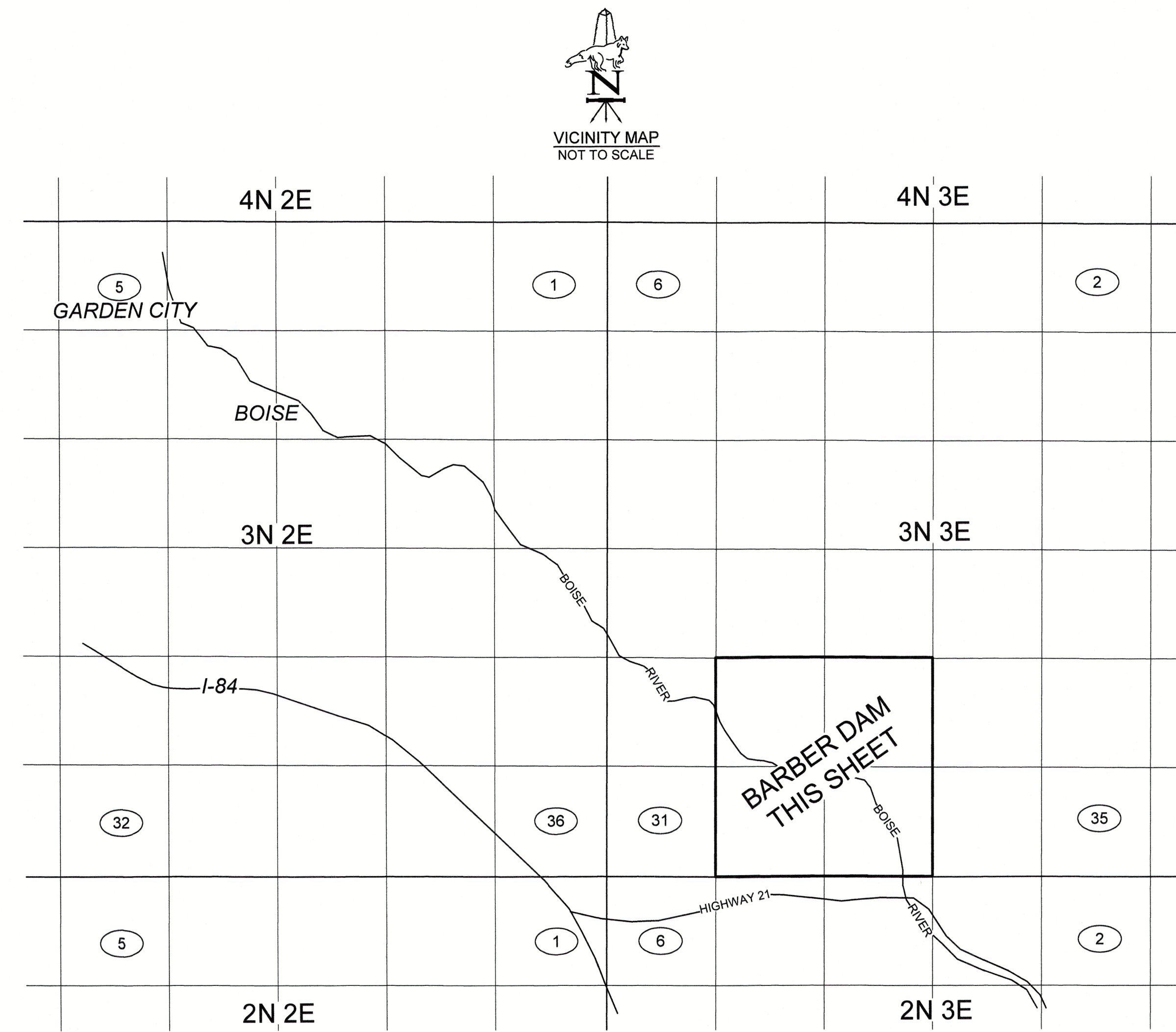
Revised Exhibit G





- OWNERSHIP**
- 1 IDAHO FOUNDATION FOR PARKS AND LANDS, INC. (PRIVATE)
  - 2 IDAHO SHAKESPEARE FESTIVAL INC (PRIVATE)
  - 3 HARRIS FAMILY LIMITED PARTNERSHIP (PRIVATE)
  - 4 ADA COUNTY - TREASURERS OFFICE (PUBLIC)
  - 5 IDAHO DEPARTMENT OF LANDS
  - 6 DALLAS & ALTA HARRIS FAMILY FOUNDATION INC.

- DEEDS & EASEMENTS**
- A BARBER RESERVOIR MAXIMUM HIGH WATER ELEVATION 2,777 FEET (NGVD 29) = 2780 FEET (NAVD 88)
  - B THIS LINE IS THE WESTERLY RIGHT OF WAY FOR THE PENITENTIARY CANAL
  - C TAX DEED 7798952, DATED 03-04-1977
  - D WARRANTY DEED 108134559, DATED 12-18-2008
  - E WARRANTY DEED 108134560, DATED 12-08-2008
  - F IDAHO SHAKESPEARE FESTIVAL, INC. PIEZOMETER AND EMBANKMENT EASEMENT 2021-078537, DATED 05-18-2021
  - G BARBER DAM ACCESS EASEMENT 108134568, DATED 12-18-2008
  - H IDAHO POWER COMPANY TRANSMISSION LINE EASEMENT 9122336, DATED 04-30-1991
  - I IDAHO POWER COMPANY BARBER SUBSTATION EASEMENT RESERVED 484521, DATED 06-25-1960
  - J STATE OF IDAHO - BARBER DAM TERM EASEMENT NO. ES600131 DATED 05-24-2020



| BOUNDARY POINT DATA TABLE |                  |                   |
|---------------------------|------------------|-------------------|
| SHAPEFILE ID.             | LATITUDE         | LONGITUDE         |
| 1                         | N 43°33'10.7417" | W 116°05'39.1836" |
| 2                         | N 43°34'02.5294" | W 116°06'50.4339" |
| 3                         | N 43°32'45.2481" | W 116°06'15.5614" |
| 4                         | N 43°33'37.7760" | W 116°08'02.6537" |
| 5                         | N 43°33'37.5359" | W 116°07'26.8158" |
| 6                         | N 43°33'33.3851" | W 116°07'16.8294" |
| 7                         | N 43°33'46.0357" | W 116°07'21.1711" |

| PROJECT LANDS DATA TABLE     |            |                  |            |         |
|------------------------------|------------|------------------|------------|---------|
| SHAPEFILE ID.                | LOCATION   | OWNER            | TRANS LINE | ACREAGE |
| 1                            | T03N, R03E | ADA COUNTY/STATE | YES        | 100.286 |
| 2                            | T03N, R03E | PRIVATE          | NO         | 8.193   |
| TOTAL (INCLUDING WATER AREA) |            |                  |            | 108.479 |

**BARBER HYDROELECTRIC PROJECT BOUNDARY METHODOLOGY:**

THE PROJECT BOUNDARY WAS CREATED FROM THE ADA COUNTY, GIS LAND BASE PARCEL MAP. CONTOURS GENERATED ARE FROM LIDAR MAPPING PROVIDED BY ADA COUNTY COMPLETED IN 2003, RECORDED DEEDS, EASEMENTS AND RECORDS OF SURVEYS. ALL MAPPING HAS BEEN PROJECTED TO THE IDAHO STATE PLANE COORDINATE SYSTEM WESTERN ZONE, NORTH AMERICAN DATUM OF 1983 (NAD83)(2011)(EPOCH 2010) U.S. SURVEY FEET AND THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88).

THIS DATA HAS A COMBINED SCALE FACTOR OF = 0.99981359

AT LATITUDE 43° 33' 51.898" AND LONGITUDE 116° 07' 033.008"

WITH AN ELLIPSOID HEIGHT OF 2,732.48 FEET.

BARBER RESERVOIR MAXIMUM HIGH WATER ELEVATION 2,777 FEET (NGVD 29) = 2780 FEET (NAVD 88)

- LEGEND**
- PROJECT BOUNDARY
  - SECTION LINES
  - RECORD PARCEL LINE
  - RECORD EASEMENT
  - GLO MEANDOR LINE
  - EDGE OF GRAVEL
  - FENCE
  - OVERHEAD POWER LINE
  - UNDERGROUND POWER LINE
  - CONTOUR LINES
  - 2785
  - BRASS CAP MONUMENT
  - ALUMINUM CAP MONUMENT
  - FOUND 5/8" PIN
  - FOUND 1/2" PIN
  - UTILITY POLE
  - GATE
  - KEY NOTES
  - PIEZOMETER
  - GL-6
  - NW
  - GOVERNMENT LOT NUMBER
  - ALIQUOT SECTION

I HEREBY STATE THAT THE BARBER DAM PROJECT BOUNDARY DELINEATION FOR THE F.E.R.C. NO. P-4881 PROJECT AS SHOWN ON THIS EXHIBIT "G" WAS DEVELOPED WITHIN THE ACCURACIES AS REQUIRED IN 18 CFR 4.41 TO THE IDAHO STATE PLANE WEST COORDINATE SYSTEM NAD 1983. THE BARBER DAM DOCUMENTED PROJECT BOUNDARY LINE IS A COMPILATION OF FIELD SURVEYS.

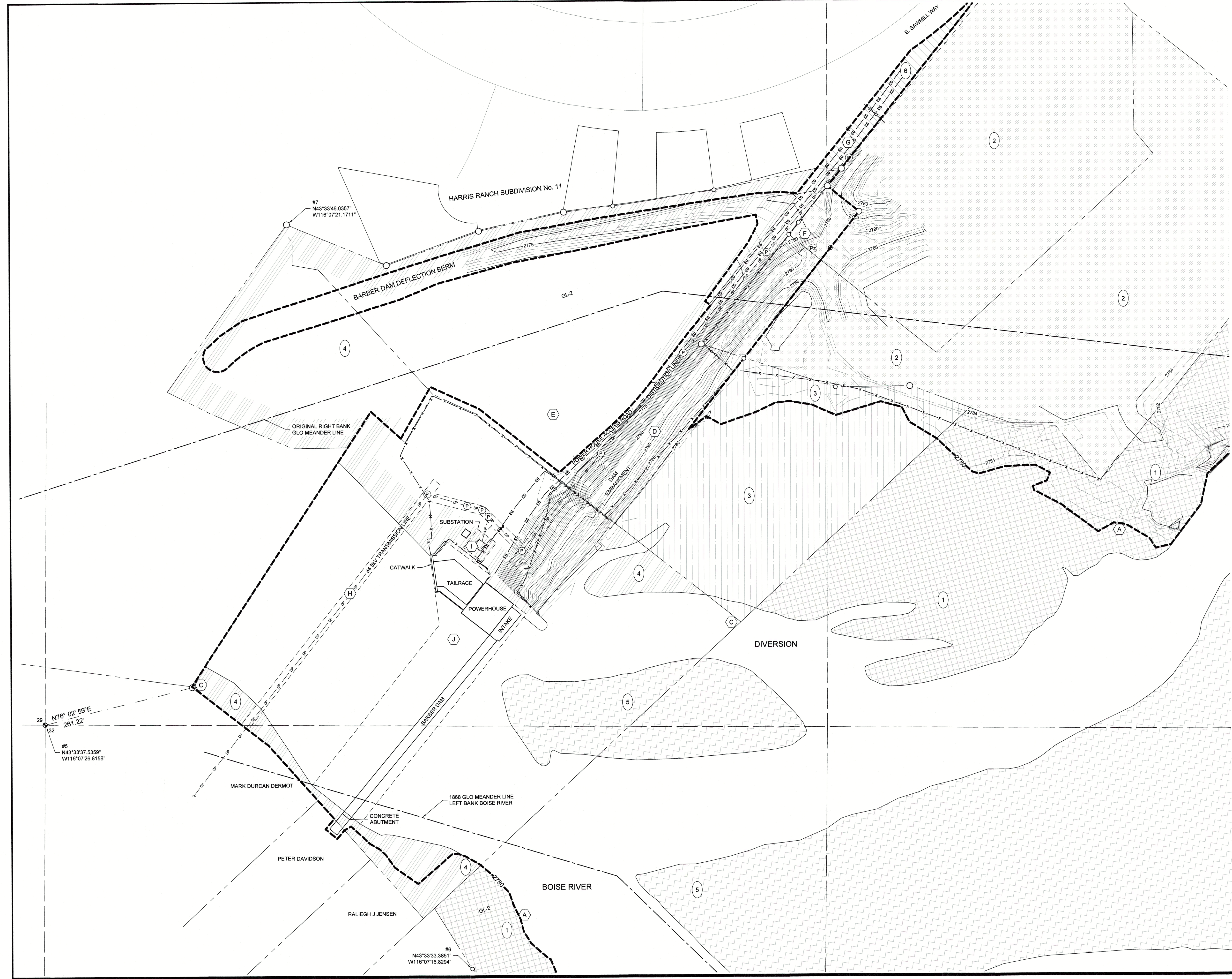
BY: *Ronald M. Hodge* 06-21-22  
RONALD M. HODGE, P.L.S. DATE


**BARBER DAM**  
F.E.R.C. NO. P-4881  
CENTRAL RIVERS POWER  
FOX LAND SURVEYS, MERIDIAN, IDAHO - JUNE, 2022

**EXHIBIT G-1**  
**PROJECT BOUNDARY & KEYMAP**







  
 SCALE: 1"=50'  
 COORDINATE PROJECTION  
 IDAHO STATE PLANE- WEST ZONE  
 HORIZ: NAD83  
 VERT: NAVD1988  
 UNITS: US FOOT

DEEDS & EASEMENTS

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- (B) THIS LINE IS THE WESTERLY RIGHT OF WAY FOR THE PENITENTIARY CANAL
- (C) TAX DEED 7798952, DATED 03-04-1977
- (D) WARRANTY DEED 108134559, DATED 12-18-2008
- (E) WARRANTY DEED 108134560, DATED 12-08-2008
- (F) IDAHO SHAKESPEARE FESTIVAL, INC. PIEZOMETER AND EMBANKMENT EASEMENT 05-18-2021
- (G) BARBER DAM ACCESS EASEMENT 108134568, DATED 12-18-2008
- (H) IDAHO POWER COMPANY TRANSMISSION LINE EASEMENT 9122336, DATED 04-30
- (I) IDAHO POWER COMPANY BARBER SUBSTATION EASEMENT RESERVED 484521,
- (J) STATE OF IDAHO - BARBER DAM TERM EASEMENT NO. ES600131 DATED 05-24-21

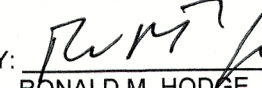
LEGEND

- PROJECT BOUNDARY
- SECTION LINES
- RECORD PARCEL LINE
- RECORD EASEMENT
- GLO MEANDOR LINE
- EDGE OF GRAVEL
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- NW
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OWNERSHIP

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BY:  DATE: 06-21-22  
 RONALD M. HODGE, P.L.S.



BARBER DAM  
 F.E.R.C. NO. P-4881  
 CENTRAL RIVERS POWER  
 FOX LAND SURVEYS, MERIDIAN, IDAHO - JUNE, 2022

EXHIBIT G-2  
 PROJECT BOUNDARY DETAIL



# EXHIBIT A

Single-Line Electrical Diagram (CEII)

Records: 12

Version: FoxBASE+/ dBASE III PLUS

| Id | Location   | Owner               | Trans_Line | Acreage           |
|----|------------|---------------------|------------|-------------------|
| 0  | T03N, R03E | Ada County/State    | Yes        | 1.08390043700e+02 |
| 0  | T03N, R03E | Idaho Parks Areas   |            | 4.82807195411e+00 |
| 0  | T03N, R03E | Harris Family Areas |            | 2.56213076104e+00 |
| 0  | T03N, R03E | Harris Family Areas |            | 1.27233196000e-02 |
| 0  | T03N, R03E | Harris Family Areas |            | 2.43455257117e-01 |
| 0  | T03N, R03E | Ada County/State    |            | 2.25737828908e-01 |
| 0  | T03N, R03E | Ada County/State    |            | 2.84711215820e+00 |
| 0  | T03N, R03E | Ada County/State    |            | 4.09946747417e-01 |
| 0  | T03N, R03E | Ada County/State    |            | 1.58824572837e+00 |
| 0  | T03N, R03E | Ada County/State    |            | 4.44815941378e+00 |
| 0  | T03N, R03E | Ada County/State    |            | 2.11242664927e+01 |
| 0  | T03N, R03E | Ada County/State    |            | 9.29796690551e-01 |



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PROJCS["NAD_1983_2011_StatePlane_Idaho_West_FIPS_1103_Ft_US",GEOGCS["GCS_NAD_1983_2011",DATUM["D_NAD_1983_2011",SPHEROID["GRS_1980",6378137.0,298.257222101]],PRIMEM["Greenwich",0.0],UNIT["Degree",0.0174532925199433]],PROJECTION["Transverse_Mercator"],PARAMETER["False_Easting",2624666.666666666],PARAMETER["False_Northing",0.0],PARAMETER["Central_Meridian",-115.75],PARAMETER["Scale_Factor",0.9999333333333333],PARAMETER["Latitude_Of_Origin",41.66666666666666],UNIT["Foot_US",0.3048006096012192]]
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Map Datum: NAD 83  
Units of Measurement: Feet  
FERC Project Number: P-4881-XXX  
Data Description: Boundary Polygon  
FERC Approval Data: XX-XX-20XX  
File Extension: P-4881-XXX, boundary polygon data, XX-XX-2022



## Document Content(s)

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