Yuba Feather Workgroup

collaborative solutions for flood control and habitat restoration

February 19, 2003

Mr. Rick Ramirez, Manager
Oroville Facilities Relicensing Program
1416 Ninth Street, Room 1115-16
Sacramento, CA 95814

Participants:

South Yuba River Citizens League

CALFED Agencies

Friends of the River

Nevada County

Sutter County

The Sierra Club

Yuba County Water Agency

Dear Mr. Ramirez:

The Yuba/Feather Work Group (Work Group) is a stakeholder-based collaborative comprised of representatives of local, state, and federal agencies as well as non-profit environmental interests. It was formed to work on flood control and related environmental restoration issues in the Yuba and Feather River watersheds. We would like to share the following concerns with you regarding the Department of Water Resources (Department) activities as they relate to the Federal Energy Regulatory Commission's (FERC) relicensing of the Oroville facilities.

1. It has been our expectation that the Department would address flood control operational issues (and related physical improvements) during its relicensing process. However, in discussions with Department staff during joint meetings held in July and August, it appears that the Department currently envisions that physical or operational flood control improvements at Oroville Dam will be considered outside the FERC relicensing effort. We believe that the Oroville FERC relicensing process is the proper forum to address flood control issues related to Oroville facilities and operation. This is because Oroville is the most significant flood control facility on the Feather-Yuba system with well over 100,000 people at risk for flood damage in the Feather-Yuba flood plain area. Also, major facility improvements to better support current and future flood control operations will require approval by FERC.

2. The Work Group is also concerned that the zone of impacts, as demonstrated by the Relicensing Process study area described for the flood management studies may not adequately reflect the true downstream impacts of Oroville operations during a flood event. The influence of releases from the Oroville Facilities can be measured beyond the confluence of the Yuba or Bear Rivers.

3. We are concerned that the physical structure of the ungated spillway may not comport well with the existing reservoir regulation manual that calls

for use of reservoir surcharge space by utilizing the Dam's ungated spillway when appropriate. (This is the spillway referred to in DWR documentation and the Flood Control Operations Manual as the "emergency spillway." Flood control manual operations that **do not** feature use of the ungated spillway were based upon the construction of Marysville Dam for providing a flood reservation pool of about 240,000 acre feet, but the Marysville Dam was never built, and it is highly unlikely that the dam will be built in the future.) At present, the ungated spillway at Oroville Dam consists of a spillway lip only – and utilizes a hillside as the project spillway. Utilizing such a spillway has the potential to cause severe damage to the downstream hillside, project facilities, and downstream environments located in the path of the flood release.

We believe that FERC may prove reluctant to relicense a major dam facility where noteworthy damages to project facilities and project lands may occur as a result of operational use of one of its licensed projects. In the absence of physical facilities to accommodate operational flood releases at the Dam, the Department would likely face pressure from FERC to resolve the conflict between downstream public safety and damage caused by release of water across the ungated spillway.[1] In addition, FERC and others may be concerned that Department operators may prove reluctant to fully implement Oroville's existing reservoir regulation manual out of reluctance to incur such damages from operational releases. If either circumstance materializes, the flood management capabilities of Oroville Dam envisioned originally would be impaired.[2]

We do not believe that it is in the Department's best interest to pursue a relicensing strategy that might in practice reduce the effective flood control space at Oroville Dam. Rather, it would seem prudent to seek approval from FERC for modifications to the Dam such as the construction of a spillway below the ungated spillway lip that would allow Dam operators to operate the Dam consistent with the existing and desired flood operation rules without causing significant damages or disruption to project land and facilities.

4. It is also our understanding that there is general agreement that the current flood control regulation manual for surcharge operations at Oroville could be optimized and improved. Our Work Group looks forward to working with the Department and the U.S. Army Corps of Engineers on such an effort. Currently contemplated revisions to the

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[1] FERC spillway guidelines distinguish three specific classifications of spillways: *service spillways* which "should exhibit excellent performance characteristics up to the 1% chance flood event" and could exhibit more "marginally safe performance characteristics for the inflow design flood" (usually the probable maximum flood), *auxiliary spillways* designed for infrequent use and could sustain limited damage during the inflow design flood, and *emergency spillways* that because of their infrequent use it is acceptable to sustain significant damage. ("Selecting and Accommodating Inflow Design Floods for Dams, FERC, October, 1993.) Oroville Dam's ungated spillway under current flood control operational rules best fits FERC's auxiliary spillway classification.

[2] Operational use of the ungated spillway would likely prove necessary only in a record runoff event on the Feather River. However, the capacity to undertake such operations could prove useful in the context of integrated interbasin flood control operations that may emerge in the framework established by the Department's and Corps of Engineers' Comprehensive Study. Also, some design flood volumes being assessed in the Comprehensive Study and the Proposition 13 Yuba Feather Study exceed record inflows into Oroville Dam.

flood control manual include: 1) updating the focus of the flood operations manual to reflect current conditions (including the absence of Marysville Reservoir re-regulating facilities on the main stem of the Yuba River), 2) possible addition of new features and refinement to the flood manual operations being examined in YCWA's Forecast Coordinated Operations study.

5. The Work Group understands, and is very encouraged that the Department has committed to engage the U.S. Army Corps of Engineers and other stakeholders in discussions of flood management operations and related issues. Nevertheless, it may prove advantageous for the Department to identify any desirable operational changes – and work with the U.S. Army Corps of Engineers to make any necessary changes to the reservoir regulation manual – during the relicensing effort. Given the possible time constraints on the FERC process, it is extremely important that the Department identify the range of possible operational changes that may be undertaken in order for the Commission to structure its license to accommodate future changes, or to structure Commission review and decisions on these contemplated changes.

The Work Group is interested in engaging the relicensing process in meaningful dialogue regarding the issues discussed above. Ideally, a complete picture of optimized flood operations should be available to FERC when the license is submitted in 2005. However, it should be emphasized that none of these contemplated amendments to the flood control manual will change the desirability of improving the ungated spillway – which must be licensed by FERC.

The Yuba/Feather Work Group wishes to thank you for this opportunity to address these key issues regarding flood management at the Oroville Facilities. We anticipate that our comments and participation will be incorporated into your work. Please reply to John Clerici at (916) 658-0180 or at Public Affairs Management, 455 Capitol Mall Complex, Suite 305, Sacramento, California 95814 with your response to the issues we have raised in this letter.

Sincerely,

Janet Cohen
Yuba-Feather Work Group

Cc: Thomas M. Hannigan, Director, DWR