

FEDERAL ENERGY REGULATORY COMMISSION  
Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

Project No. 6964-009 – Colorado  
Redlands Project  
Redlands Water and Power Company

Mr. Greg Strong  
2518 Monument Blvd #C  
Grand Junction, CO 81503

**July 22, 2015**

Subject: Flow Deviations Discovered during Triennial Dam Safety/Operation Inspection

Dear Mr. Strong:

On June 9, 2015, Mr. Michael Vail of the Commission's Division of Dam Safety and Inspections – San Francisco Regional Office (D2SI-SFRO) inspected the Redlands Project No. 6964.<sup>1</sup> During the inspection, Mr. Vail reviewed your flow records over the past couple of years, including both the flows that the project diverts into the power canal and the flows in the Gunnison River downstream from the project. Mr. Vail identified several deviations in the flow requirements and referred the matter to us, the Commission's Division of Hydropower Administration and Compliance.

**Background**

Standard Article 2, included in your exemption, requires compliance with any terms and conditions that Federal or State fish and wildlife agencies have determined appropriate to prevent loss of, or damage to, fish and wildlife resources. The terms and conditions referred to in Article 2 are contained in any letters of comment by these agencies which have been forwarded to you in conjunction with the exemption.

Ordering paragraph (A) of the August 12, 1996 Order Amending Exemption Article 2 Terms and Conditions<sup>2</sup> states "The maximum diversion rate at the project is 850 cubic feet per second (cfs), except during low-flow periods when the Gunnison River has a flow of less than 300 cfs downstream of the project, as measured at the Bureau of Reclamation's gaging station. When that gage reads less than 300 cfs, the maximum

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<sup>1</sup> *Redlands Water and Power Company*, 23 FERC ¶ 62,100 (1983).

<sup>2</sup> *Redlands Water and Power Company*, 76 FERC ¶ 62,104 (1996).

diversion rate is 750 cfs. This amendment to the Article 2 terms and conditions regarding flow requirements replaces the requirement specified in the Commission's Order Amending Exemption Article 2 Terms and Conditions, issued June 19, 1995.”<sup>3</sup>

### **Discussion**

Mr. Vail’s review of your recent flow records identified several occasions when the diversion rate exceeded 850 cfs. In addition, there were several other occasions when the flow in the Gunnison River was less than 300 cfs, but the diversion rate exceeded 750 cfs. While you mentioned that there has always been a 5 percent allowable variance at the gage and past proceedings reference this variance, the 1996 amendment order does not reference this variance.

To assist us in review of this matter, you must file, within 60 days from the date of this letter, a clarification of the allowable variance at the gage in relation to the amended diversion rates identified in the 1996 amendment order. You must consult with the appropriate resource agencies to determine if the agencies agree with your understanding related to the 5 percent allowable variance and provide proof of the consultation with your filing. Based on your consultation with the resource agencies, you may need to include an update to your approved streamflow gaging plan and/or request to amend Article 2 of your exemption. We remind you that per ordering paragraph (B) of the October 13, 1993 Order Approving Streamflow Gaging Plan<sup>4</sup> you must report all deviations from Article 2 to the Commission within 30 days of the date of the deviation.

Please file this clarification with the Secretary of the Commission. The Commission strongly encourages electronic filing. Please refer to the instructions on the Commission’s website under <http://www.ferc.gov/docs-filing/efiling.asp> and filing instructions in the Commission’s regulations at [18 C.F.R. § 385.2001\(a\) \(1\) \(iii\)](http://www.ferc.gov/docs-filing/efiling.asp). To assist you with eFilings you should refer to the submissions guidelines document at <http://www.ferc.gov/help/submission-guide/user-guide.pdf>. With the filing, it is very important for you to include a cover letter that identifies the project number (P-6964-009) and the reason for the submittal.

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<sup>3</sup> *Redlands Water and Power Company*, 71 FERC ¶ 62,196 (1995).

<sup>4</sup> *Redlands Water and Power Company*, 65 FERC ¶ 62,060 (1993).

Thank you for your cooperation. If you have any questions regarding this letter, please contact Jeremy Jessup at (202) 502-6779 or [Jeremy.Jessup@ferc.gov](mailto:Jeremy.Jessup@ferc.gov).

Sincerely,

Kelly Houff  
Chief, Engineering Resources Branch  
Division of Hydropower Administration  
and Compliance