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May 12, 2011
File No. 01030A (P-2079-069)

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

**Subject: Middle Fork American River Project (FERC Project No. 2079)
Response to the Commission's Memo Requesting Additional Information**

Dear Secretary Bose:

The following information was developed to provide the Federal Energy Regulatory Commission (FERC or Commission) staff with additional information necessary to conduct their environmental review of Placer County Water Agency's (PCWA) Middle Fork American River Project (MFP or Project). PCWA filed an Application for New License for the MFP with the Commission on February 23, 2011.

Background

On April 4, 2011, PCWA representatives met with Timothy Welch, Carolyn Templeton, and Frank Winchell of the Commission and Doug Hjorth of the Lewis Berger Group (consultant to the Commission) to discuss the MFP relicensing process and schedule. During the meeting, the Commission staff identified additional information needed to conduct their environmental review of the Project. The information needed by the Commission staff was further defined in a memo from the Commission to PCWA dated April 7, 2011. PCWA agreed to file the information with the Commission no later than May 16, 2011. Copies of this letter and the associated attachments will also be sent to Dr. Frank A. Winchell, Archeologist and to Wing Lee, Acting Director - FERC Office of Energy Projects to (Attachment A). Copies of this letter and attachments will be provided electronically to the parties identified on the distribution list included in Attachment B.

Information provided in this response is organized consistent with the Commission's Memo. Citations for literature referenced in this response are provided in Attachment C. The information provided in this response is relative to PCWA's Proposed Action, which is described in the Application for New License. PCWA is currently continuing discussions with the MFP relicensing participants on proposed protection, mitigation, and enhancement (PM&E) measures. The focus of these discussions are concentrated on four specific topics areas including:

- *Instream Flow and Reservoir Minimum Pool Measure;*
- *Flow and Reservoir Monitoring Plan;*
- *Recreation Plan; and*
- *Vegetation and Integrated Pest Management Plan.*

If these discussions result in changes in PM&E measures proposed for the MFP, PCWA will file supplemental information with the Commission to update this filing and other information provided in the Application for New License, as appropriate, for consideration in the Commission's environmental review of the MFP.

Cultural Resources

FERC Request No. 1:

As part of PCWA's Historic Properties Management Plan please provide:

- *A description of all 34 sites documented within the Area of Potential Effect (APE), their National Register of Historic Places status, the reasons why PCWA believes 17 are not affected by the project, measures to monitor all 34 sites within a 5-year period, steps to consult with parties if and when project-related effects have been identified on these 17 sites, and a depiction of all sites on a map(s);*
- *Copies of consultation letters regarding SHPO concurrence with the APE, correspondence with tribes, the Forest Service, and others consulted regarding cultural resources; and*
- *Measures to address paleontological resources on federal lands.*

PCWA Response No. 1:

The Draft Historic Properties Management Plan (HPMP) included in PCWA's Application for New License, Volume 5, Supporting Document (SD) E (PCWA 2011a) has been revised to include the requested information. The revisions to the Draft HPMP do not result in any changes to the impact analysis included in PCWA's Application for New License.

The Revised Draft HPMP and consultation documentation regarding cultural resources requested by the Commission includes privileged information regarding the location(s) of sensitive cultural resources. The disclosure of this information could be harmful to these resources. Therefore, the Revised Draft HPMP and requested consultation documentation are being filed separately with the Commission in a sealed envelope marked "CONTAINS PRIVILEGED INFORMATION – DO NOT RELEASE". Pursuant to 36 CFR § 800.11(c)(1), the head of a federal agency may withhold from public disclosure any information about the location, character, or ownership of a historic property, or impede the use of a traditional site by practitioners. PCWA requests privileged treatment of the Revised Draft HPMP and enclosed consultation documentation.

A copy of the Revised Draft HPMP and consultation documentation is also being provided under separate cover in a sealed envelope marked "CONTAINS PRIVILEGED INFORMATION – DO NOT RELEASE" to the following parties:

- Frank Winchell, FERC's Archaeologist assigned to the relicensing of the MFP;
- Wing Lee, Director of FERC's San Francisco Regional Office;
- Milford Wayne Donaldson, State Historic Preservation Officer (SHPO);
- U.S. Department of Agriculture - Forest Service (USDA-FS) cultural resource specialists (Tahoe National Forest and Eldorado National Forest); and
- Native American Tribes.

Note that the Draft HPMP included in PCWA's Application for New License indicated that there are 34 sites located within the MFP APE. Of these, 17 were identified as having been formally evaluated for National Register of Historic Places (NRHP) eligibility by either PCWA or the USDA-Forest Service (USDA-FS). One site, FS-05-17-54-214, was formally evaluated by PCWA for NRHP eligibility but is not located within the MFP APE. Since this site is not located within the MFP APE, it was removed from the HPMP. Accordingly, the Revised Draft HPMP identifies 16 sites located within the MFP APE that were evaluated for NRHP-eligibility by either PCWA or the USDA-FS.

At the request of the Commission, the Revised Draft HPMP includes information regarding the sites that are located within the MFP that were not formally evaluated for NRHP eligibility. Previous documents and correspondence identified 17 sites in this category. However, one site (FS-05-17-54-06) was recently added to the list, resulting in 18 sites in this category. Site FS-05-17-54-06 was originally recorded by the USDA-FS as a bedrock milling station and flake scatter. However, the site could not be located during surveys conducted by PCWA's archaeologists and was therefore not included in the inventory. However, based on further consultation with the USDA-FS, PCWA will revisit this site in 2011 to develop additional information about this site.

Terrestrial Resources

FERC Request No. 2:

Please provide a discussion of wetlands in the project area and maps indicating the location of these wetlands and a discussion of the effects of proposed water level fluctuations on wetlands along the reservoir shorelines.

PCWA Response No. 2:

Under the Clean Water Act, the Environmental Protection Agency (EPA) and United States Army Corps of Engineers (USACE) define wetlands as "areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (EPA 2010).

Information on the distribution of wetlands within the MFP study area was first compiled from review of published reports, geographic information system (GIS) data, and historic and recent aerial photography. In addition, wetland habitats were mapped during low-altitude helicopter

surveys and vegetation community and wildlife habitat mapping in the study area as described in AQ 10 – Riparian Resources Technical Study Report (TSR) and TERR 1 – Vegetation Communities and Wildlife Habitat TSR (PCWA's Application for New License, Volume 3, Exhibit E, SD B [PCWA 2011b and 2011c]).

No wetlands (e.g., meadows, marshes, or fens) were identified in the MFP study area, including along the perimeters of the reservoirs. Therefore, changes in reservoir water surface fluctuations in the Proposed Action does not have the potential to affect wetland habitat.

FERC Request No. 3:

Several California Species of Special Concern were discussed in the Pre-application Document, but not in the license application. Please describe the proposed project effects, if any on the following special-status species using best available information:

- *Mount Lyell salamander*
- *Sacramento roach*
- *Coopers hawk*
- *Willow flycatcher*
- *Black swift*

PCWA Response No. 3:

Mount Lyell salamander

The Mount Lyell salamander (*Hydromantes platycephalus*) is designated as a California Species of Special Concern (CSC) by California Department of Fish and Game (CDFG) (CDFG 2011) and has the potential to occur in the vicinity of the MFP (PCWA's PAD, SD F, Section 7.4 [PCWA 2007]). However, there are no known occurrences in the immediate vicinity of the MFP. The closest known occurrence is more than 50 miles from the nearest MFP facility (one observations in Blackwood Canyon, approximately three miles south of Tahoe City in Placer County) (Californiaherps.com 2011). The geographic and elevational range of the Mount Lyell salamander extends from 4,130 to 11,940 feet in elevation (Morey 2000). The highest elevations associated with MFP facilities (5,500 ft) are in the lower range of the known elevation boundary.

The Mount Lyell salamander is primarily known to occur in areas with massive rock outcrops within mixed conifer, red fir, lodgepole pine, and subalpine communities (Morey 2000). The species is associated with granite talus with water seeping through it, typically downslope from snowfields that melt well into the summer. It inhabits caves, granite boulders, rock fissures, rocky stream edges, and seepage from springs and melting snow. The species frequents cliff faces and vertical cavern walls. In the Yosemite Valley, the species is found within the spray zones of several waterfalls and under moss on wet rock faces (Californiaherps.com 2011). Most locations tend to be open, not shaded. Additional information on their distribution and habitat is available in PCWA's PAD, SD F, Appendix 6-C (PCWA 2007).

PCWA conducted extensive surveys over a three-year period along the bypass and peaking reaches associated with the MFP and around all MFP facilities in support of PCWA's aquatic fish, amphibian, mollusk, riparian, and terrestrial technical studies, including the AQ 2 – Fish

Population TSR; AQ 3 – Macroinvertebrate TSR; AQ 3 – Aquatic Mollusk TSR; AQ 10 – Riparian Resources TSR; AQ 12 – Special-Status Amphibians and Aquatic Reptiles TSR; TERR 2 – Special-Status Plants; TERR 3 – Noxious Weed; and TERR 4 – Special-Status Wildlife (available in PCWA's Application for New License, Volume 3, Exhibit E, SD B [PCWA b, d-j]). Sightings of aquatic, amphibian, and aquatic reptile species were recorded during these surveys. No Mount Lyell salamanders were observed. The Proposed Action does not include any operation or maintenance activities in the vicinity of Mount Lyell salamander potential habitat; and therefore implementation of the Proposed Action would not affect this species.

California Roach/Sacramento Roach

The California roach (*Lavina symmetricus*) "complex" consists of several subspecies (Moyle 2002). The subspecies found in the vicinity of the MFP is the Sacramento roach (*L. s. symmetricus*). This subspecies is not designated as a CSC by CDFG (CDFG 2011) or as a sensitive species by any other government agency (e.g., USDA-FS, United States Fish and Wildlife Service); therefore it was not included in PCWA's Application for a New License as a sensitive species. The distribution, abundance, and instream flow habitat information for this subspecies is described in the AQ 2 – Fish Population TSR 2007–2009 and AQ 1 – Instream Flow TSR included in PCWA's Application for New License, Volume 3, Exhibit E, SD B (PCWA 2011d and 2011k). The affected environment of the subspecies is included in PCWA's Application for New License, Volume 3; Exhibit E, Sections 7.5.3, 7.5.5, 7.5.7, and 7.5.8 (PCWA 2011l) and the environmental effects of the MFP on riverine physical habitat, the riverine aquatic community, and fish species are described in PCWA's Application for New License, Volume 3; Exhibit E, Sections 8.5.1, 8.5.2, and 8.5.3 (PCWA 2011l). The Proposed Action includes measures to enhance instream flow habitat and sediment conditions in the bypass and peaking reaches. These measures include increased minimum instream flows (MIFs), environmental pulse flows, and modified sediment management practices. These measures will enhance California roach/Sacramento roach habitat.

Cooper's Hawk

Life history information for Cooper's hawk (*Accipiter cooperi*); is provided in PCWA's PAD, SD F, Appendix 7-D (PCWA 2007). On February 4, 2008, Western Field Ornithologists (WFO) and CDFG jointly published California Bird Species of Special Concern (WFO/CDFG 2008), which provides a ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. According to this publication, Cooper's Hawk is no longer considered to be a CSC; therefore it was not included in PCWA's Application for New License. However, the Proposed Action includes measures to reduce the potential risk of raptor electrocution and measures to protect raptor nests during routine maintenance activities (PCWA's Application for New License, Volume 3; Exhibit E, Section 8.6.3 [PCWA 2011l]). Implementation of the Proposed Action will therefore protect Cooper's hawk.

Willow Flycatcher

Life history information for willow flycatcher (*Empidonax traillii brewsteri*; Forest Service Sensitive and State Endangered) is provided in PCWA's PAD, SD F, Appendix 7-D (PCWA 2007) and in PCWA's Application for New License, Volume 3, Exhibit E, Table 7.6-6 (PCWA 2011l). This information is also provided in PCWA's Application for New License, Volume 3, Exhibit E, SD C, Biological Assessment/Biological Evaluation (BA/BE) (PCWA 2011m). The

MFP is within the known geographic and elevational range for willow flycatcher; however, extensive surveys by USDA-FS have not documented any appropriate habitat in the immediate vicinity of the MFP. The nearest appropriate habitat for this species was identified by USDA-FS at the Diamond Crossing Snow Course, located approximately 3.7 miles from the nearest MFP facility (PCWA's Application for New License, Volume 3; Exhibit E, SD B [PCWA 2011]).

Implementation of the Proposed Action would not affect this species because appropriate willow flycatcher habitat is not present in the vicinity of the MFP.

Black Swift

Life history information for black swift (*Cypseloides niger*; CSC) is provided in PCWA's PAD, SD F, Appendix 7-D (PCWA 2007) and in PCWA's Application for New License, Volume 3, Exhibit E, Table 7.6-6 (PCWA 2011). The black swift is a potential summer (breeding) resident in appropriate habitat. The MFP is within the known geographic and elevational range of this species. A CNDDDB report documents this species near Grouse Creek, a tributary to the North Fork of the Middle Fork American River, approximately 4.7 miles from the nearest MFP facility (PCWA's Application for New License, Volume 3, Exhibit E, Table 7.6-6 [PCWA 2011]).

Black swift could potentially forage over aquatic habitats in the vicinity of the MFP (i.e., large and medium reservoirs and/or MFP bypass and peaking reaches). Changes in routine operation of the MFP, as well as implementation of vegetation and noxious weed management under the Proposed Action could potentially affect aquatic foraging habitat. Analysis of potential Project effects on aquatic foraging habitat for osprey and other aquatic foraging birds and bats is included in PCWA's Application for New License, Volume 3, Exhibit E, Section 8.6.1.1 (PCWA 2011). This analysis also applies to black swifts potentially foraging over reservoirs and bypass and peaking reaches associated with the Project. As described in PCWA's Application for New License, Volume 3, Exhibit E, Section 8.6.1.1 (PCWA 2011), implementation of the Proposed Action will protect aquatic-foraging bird species (including black swift) and their habitats through changes in operations of the MFP and through measures included in the management plans. These include increased minimum instream flows, minimum reservoir pool requirements, implementation of measures to protect water quality during routine maintenance activities, and annual resource agency consultation.

Recreation and Land Use

FERC Request No. 4:

- *Regarding all existing and proposed trails, please indicate the type of trail access (e.g., pedestrian, Off-Highway Vehicle, etc.) that would be provided on these trails.*

PCWA Response No. 4:

Existing and proposed Project trails are addressed in PCWA's Transportation System Management Plan (TSMP), which is available in PCWA's Application for New License Volume 3, Exhibit E, SD A (PCWA 2011n). The Proposed Action includes 13 Project trails, four of which will be constructed after license issuance (TSMP Table 2).

As indicated in Section 4.0 of the TSMP, Project trails are used almost exclusively by PCWA to access select Project facilities, such as microwave reflector stations and stream gages and/or weirs. PCWA does not prohibit public access along Project trails and low levels of public use may occur along select Project trails. As identified in the TSMP, the Project trails will be managed and designed for pedestrian use. At the request of the USDA-FS, motorized use of Project trails will be prohibited.

FERC Request No. 5:

- *Please provide a rationale for decreasing the area within the project boundary. Please provide a description of the buffer that would exist around project features, particularly the reservoirs. Please address whether the remaining buffer zone is sufficient to ensure public access, protect riparian, and other shoreline resources, and the quality of project waters.*

PCWA Response No. 5:

FERC Boundary

The existing FERC Project boundary encompasses 4,554 acres of land including 1,883 acres within the Tahoe National Forest (TNF) and 1,385 acres within the Eldorado National Forest (ENF). The remainder of the MFP is located on PCWA-owned land or private land.

All of the area that is currently withdrawn for hydroelectric power purposes is not required for operation and maintenance of the MFP. Therefore, as summarized in Volume 1, Exhibit E, Section 4.2 of PCWA's Application for New License (PCWA 2011I), PCWA proposes to modify the FERC Project boundary as follows:

- Increase the boundary to include:
 - New Project facilities constructed as part of the Proposed Action;
 - Existing facilities added to the MFP that are necessary for operation and maintenance of the Project; and
 - Footprint of all Project recreation facilities.
- Decrease the boundary to remove excess lands currently within the existing FERC Project boundary that are not necessary for operation and maintenance of the MFP (particularly around Project reservoirs).

These revisions are visually depicted on Maps 4-3 a-o included in Volume 1, Exhibit E, Section 4.0, (PCWA 2011I) of PCWA's Application for New License. Detailed maps and specific parcel and acreage information is available in PCWA's Application for New License, Exhibits A and G (PCWA 2011).

Overall, the modifications will decrease the area within the FERC Project boundary by a total of 404 acres. Upon approval, the revised FERC Project boundary will encompass 4,150 acres of land including 1,746 acres within the TNF, 1,306 acres within the ENF, and 4 acres of land under Bureau of Land Management (BLM) jurisdiction. The remaining area encompasses private land or land owned by PCWA. As required in CFR 18 Part 5.18 § 4.41(h)(2), the

Proposed FERC Project boundary encloses “only those lands necessary for operation and maintenance of the project and for other project purposes, such as recreation, shoreline control, or protection of environmental resources.” The proposed FERC Project boundary retains all of the area that is necessary for operation and maintenance of the MFP, while releasing land that is not necessary for operation and maintenance of the MFP so that it may be utilized for other public purposes.

The distances between the Project facilities and the existing and proposed FERC Project boundaries are summarized on Attachment D, along with a rationale for decreasing the area within the Project boundary. The Proposed FERC boundary encompasses specific “buffer areas” around each Project facility or feature. These buffer areas were established based on a detailed review of PCWA’s operation and maintenance activities, and include all of the area necessary for operation and maintenance of the Project facilities, including vegetation management. The Proposed FERC boundary includes a minimum 100 feet buffer area around the Project reservoirs, as measured from the maximum operation level inundation footprint. In all cases, including around the Project reservoirs, the proposed FERC Project boundary includes sufficient area to ensure public access, protect riparian and other shoreline resources, and the quality of Project waters, as discussed in the following.

The proposed FERC Project boundary around the reservoirs and smaller impoundments includes sufficient area to ensure public access, and to help protect the recreation and aesthetic values of the MFP reservoirs and their shorelines. All of the land surrounding the MFP reservoirs, within the proposed FERC Project boundary, is either owned by PCWA or is public land managed by the USDA-FS. Neither PCWA nor the USDA-FS restrict access to any of the MFP reservoirs or shorelines, except where perimeter fences surround certain MFP facilities (e.g., powerhouses and switchyards) for security purposes. In some areas, access to portions of the reservoirs and to smaller impoundments is limited due to steep terrain.

As required in the Federal Power Act (FPA), PCWA operates the MFP shorelines consistent with license requirements and project purposes, while addressing the needs of the public. Other than the MFP recreation facilities, there are no permitted piers, boat docks, landings, bulkheads, or other shoreline facilities associated with any of the MFP reservoirs or diversion pools. Furthermore, PCWA has not authorized, and the FERC has not approved, any specific uses or occupancies along the MFP reservoir shorelines that are not related to hydroelectric power production or other Project purposes.

The proposed FERC Project boundary includes sufficient area to protect riparian and other shoreline resources. All Project-related activities identified in the Proposed Action will be limited to the area within the proposed FERC Project boundary, and will be implemented in accordance with specific measures and management and monitoring plans that were developed in consultation with the resource agencies to protect riparian and other shoreline resources. These plans are available in PCWA’s Application for New License, Volume 3, Exhibit E, SD A (PCWA 2011n) and include: Instream flow and Reservoir Minimum Pool Measure, Flow and Reservoir Monitoring Plan (FRMP), Fish Population Monitoring Plan (FPMP), Geomorphology/Riparian Monitoring Plan (GRMP), Sediment Management Plan, Western Pond Turtle Monitoring Plan (WPTMP), Water Quality Monitoring Plan (WQMP), Mercury Bioaccumulation Monitoring Plan (MBIOMP), Historic Properties Monitoring Plan (HPMP), Vegetation and Integrated Pest Management Plan (VIPMP), and Bald Eagle Management Plan

(BEMP). With implementation of these measures and plans, riparian resources and shoreline resources will be protected, and maintained or enhanced within the FERC Project Boundary.

Similarly, the proposed FERC Project boundary includes sufficient area to protect the quality of Project waters. Water quality will be protected by implementing Best Management Practices (BMPs) and Avoidance and Protection (AP) measures that are identified in the VIPMP, the Transportation System Management Plan (TSMP), the Recreation Plan, and the Sediment Management Plan (SMP). These plans are included in PCWA's Application for New License, Volume 3, Exhibit E, SD A (PCWA 2011n). The measures identified in these plans will protect water quality during routine Project maintenance activities, non-routine recreation facility activities, and modification of existing and construction of new facilities.

FERC Request No. 6:

- *Costs for many protection, mitigation, and enhancement measures have been lumped in the license application. Please provide cost breakouts for the individual elements that comprise PCWA's various monitoring and management plans.*

PCWA Response No. 6:

PCWA has revised Table 11-4 from PCWA's Application for New License to include cost breakout information for individual measures and management and monitoring plans (PCWA 2011n) included as part of the Proposed Action in Volume 1, Exhibit E, Section 4.0 (PCWA 2011l) of PCWA's Application for New License. For complex management and monitoring plans that include implementation of several elements, costs are provided for individual elements. The Revised Table 11-4 is provided in Attachment E and replaces Table 11-4 in PCWA's Application for a New License. The costs provided in the attached table are consistent with the costs presented in PCWA's Application for New License submitted February 23, 2011, with two exceptions: (1) the costs associated with implementing the HPMP have been increased to reflect additional site condition monitoring that was added to the HPMP; and (2) in some cases, the values in revised Table 11-4 table are slightly different than those that were presented in PCWA's Application for New License due to rounding.

Generation Loss

FERC Request No. 7:

- *Please provide loss in generation for each powerhouse and water year type under the Proposed Action.*

PCWA Response No. 7:

The percent loss in generation under the Proposed Action by powerhouse and instream flow component (i.e., MIF, pulse flow, spill downramp, and recreation flows), during the period of record (1975–2007) is provided in Attachment F, Table 1. In addition, the percent generation loss for each powerhouse by instream flow component and by water year type is provided in Attachment F, Table 2.

PCWA looks forward to continuing to work with FERC, resource agencies, Native American Tribes, and other interested parties on the MFP relicensing. If you have any questions

regarding the additional information included in this letter, please contact Andrew Fecko, PCWA Resource Planning Administrator at (530) 823-4889 or by e-mail at afecko@pcwa.net.

Sincerely,

PLACER COUNTY WATER AGENCY



Andrew Fecko
Resource Planning Administrator

Attachments:

- Attachment A. Transmittal Letters
- Attachment B. Distribution List
- Attachment C. Literature Cited
- Attachment D. Summary of Proposed FERC Project Boundary Reductions and Associated Rationale
- Attachment E. Revised Table 11-4.
- Attachment F. MFP Generation Loss Tables 1 and 2

Enclosures:

- Revised Draft HPMP (Contains Privileged Information)
- Cultural Resources Consultation Documentation (Contains Privileged Information)

Attachment A
Transmittal Letters



ENCLOSURES CONTAIN PRIVILEGED INFORMATION

May 12, 2011
File No. 01030A (P-2079-069)

Dr. Frank A. Winchell, Archaeologist
FERC
888 First Street, N.E.
Routing Code PJ-14.6/Room 61-10
Washington DC 20426

**Subject: Middle Fork American River Project (FERC Project No. 2079)
Response to FERC Memo Requesting Additional Information**

Dear Dr. Winchell:

On April 4, 2011, PCWA representatives met with Timothy Welch, Carolyn Templeton, and Frank Winchell of the Commission and Doug Hjorth of the Lewis Berger Group (consultant to the Commission) to discuss the Middle Fork American River Project (MFP or Project) relicensing process and schedule. During the meeting, the Commission staff identified additional information needed to conduct their environmental review of the Project. The information needed by the Commission staff was further defined in a memo from the Commission to PCWA dated April 7, 2011. PCWA agreed to file the information with the Commission no later than May 16, 2011.

Several of the topics identified in the FERC's memo pertain to the Draft Historic Properties Management Plan (HPMP) that was included in PCWA's Application for New License. Accordingly, PCWA revised the Draft HPMP to address the FERC's information needs. The Revised Draft HPMP (two paper and two electronic copies) is enclosed with this letter for your review. This Revised Draft HPMP replaces the Draft HPMP that was included in the MFP Application for New License Volume 5, Supporting Document E (Privileged Information). The Draft HPMP was revised to include: (1) additional descriptive information about the cultural resources (sites) identified in the Area of Potential Effect (APE); (2) provisions to periodically monitor all of the cultural resources located within the APE; and (3) the addition of measures related to the protection and management of paleontological resources, should they be identified in the APE. These revisions do not require any change to the impact analysis included in PCWA's Application for New License.

The FERC's memo also requested that PCWA file "copies of consultation letters regarding SHPO concurrence with the APE, correspondence with tribes, the Forest Service, and others consulted regarding cultural resources." The requested consultation documentation was filed with FERC and is enclosed with this letter for your records (two paper and two electronic copies).

The Revised Draft HPMP and consultation documentation contain privileged information regarding the location(s) of sensitive cultural resources. Therefore, the Revised Draft HPMP

Dr. Frank A. Winchell
Federal Energy Regulatory Commission
May 12, 2011
Page 2

and consultation documentation are enclosed in a separate sealed envelope marked "CONTAINS PRIVILEGED INFORMATION – DO NOT RELEASE". Pursuant to 36 CFR § 800.11(c)(1), the head of a federal agency may withhold from public disclosure any information about the location, character, or ownership of a historic property, or impede the use of a traditional site by practitioners. PCWA is requesting privileged treatment of the Revised Draft HPMP and cultural resources consultation documentation from FERC.

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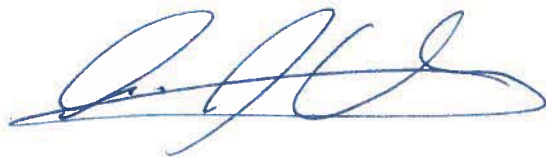
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- Native American Tribes.

Confidential treatment of these documents has been requested of each of these recipients. These documents will not be distributed to the general public or posted on the internet.

PCWA is currently continuing discussions with MFP relicensing participants on the Revised Draft HPMP. Any supplemental information developed during these discussions will be filed with FERC.

PCWA looks forward to continuing working with FERC, the resource agencies, and other interested parties on the MFP relicensing. If you have any questions regarding this submittal, please contact Andrew Fecko, PCWA Resource Planning Administrator, at (530) 823-4889 or by e-mail at afecko@pcwa.net.

Sincerely,
PLACER COUNTY WATER AGENCY



Andrew Fecko
Resource Planning Administrator

Enclosures:

Cover Letter to the FERC's Secretary
Revised Draft HPMP (Contains Privileged Information) – 2 paper and 2 electronic copies
Cultural Resources Consultation Documentation (Contains Privileged Information) – 2 paper and 2 electronic copies



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May 12, 2011

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Wing Lee, Acting Director
FERC Office of Energy Projects
901 Market St, Suite 350
San Francisco, CA 94103

**Subject: Middle Fork American River Project (FERC Project No. 2079)
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Copies of the Revised Draft HPMP and consultation documentation are also being provided under separate cover in a sealed envelope marked "CONTAINS PRIVILEGED INFORMATION – DO NOT RELEASE" to the following parties:

- Frank Winchell, FERC's Archaeologist assigned to the relicensing of the MFP;
- Milford Wayne Donaldson, State Historic Preservation Officer (SHPO);
- U.S. Department of Agriculture - Forest Service (USDA-FS) cultural resource specialists (Tahoe National Forest and Eldorado National Forest); and
- Native American Tribes.

Confidential treatment of these documents has been requested of each of these recipients. These documents will not be distributed to the general public or posted on the internet.

PCWA is currently continuing discussions with MFP relicensing participants on the Revised Draft HPMP. Any supplemental information developed during these discussions will be filed with FERC.

PCWA looks forward to continuing working with FERC, the resource agencies, and other interested parties on the MFP relicensing. If you have any questions regarding this submittal, please contact Andrew Fecko, PCWA Resource Planning Administrator, at (530) 823-4889 or by e-mail at afecko@pcwa.net.

Sincerely,
PLACER COUNTY WATER AGENCY



Andrew Fecko
Resource Planning Administrator

Enclosures:

Cover Letter to the FERC's Secretary
Revised Draft HPMP (Contains Privileged Information) – 1 paper and 1 electronic copy
Cultural Resources Consultation Documentation (Contains Privileged Information) – 1 paper and 1 electronic copy



PLACER COUNTY WATER AGENCY
SINCE 1957

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Ed Tiedemann, General Counsel

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ENCLOSURES CONTAIN PRIVILEGED INFORMATION

May 12, 2011

File No. 01030A (P-2079-069)

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks and Recreation
1725 23rd St, Suite 100
Sacramento, CA 95816

**Subject: Middle Fork American River Project (FERC Project No. 2079)
Response to FERC Memo Requesting Additional Information**

Dear Mr. Donaldson:

On April 4, 2011, PCWA representatives met with Timothy Welch, Carolyn Templeton, and Frank Winchell of the Commission and Doug Hjorth of the Lewis Berger Group (consultant to the Commission) to discuss the Middle Fork American River Project (MFP or Project) relicensing process and schedule. During the meeting, the Commission staff identified additional information needed to conduct their environmental review of the Project. The information needed by the Commission staff was further defined in a memo from the Commission to PCWA dated April 7, 2011. PCWA agreed to file the information with the Commission no later than May 16, 2011.

Several of the topics identified in the FERC's memo pertain to the Draft Historic Properties Management Plan (HPMP) that was included in PCWA's Application for New License. Accordingly, PCWA revised the Draft HPMP to address the FERC's information needs. The Revised Draft HPMP (two paper and two electronic copies) is enclosed with this letter for your review. This Revised Draft HPMP replaces the Draft HPMP that was included in the MFP Application for New License Volume 5, Supporting Document E (Privileged Information). The Draft HPMP was revised to include: (1) additional descriptive information about the cultural resources (sites) identified in the Area of Potential Effect (APE); (2) provisions to periodically monitor all of the cultural resources located within the APE; and (3) the addition of measures related to the protection and management of paleontological resources, should they be identified in the APE. These revisions do not require any change to the impact analysis included in PCWA's Application for New License.

The FERC's memo also requested that PCWA file "copies of consultation letters regarding SHPO concurrence with the APE, correspondence with tribes, the Forest Service, and others consulted regarding cultural resources." The requested consultation documentation was filed with FERC and is enclosed with this letter for your records (two paper copies and two electronic copies).

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Sincerely,
PLACER COUNTY WATER AGENCY



Andrew Fecko
Resource Planning Administrator

Enclosures:

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ENCLOSURES CONTAIN PRIVILEGED INFORMATION

May 12, 2011

File No. 01030A (P-2079-069)

**Subject: Middle Fork American River Project (FERC Project No. 2079)
Response to FERC Memo Requesting Additional Information**

Dear USDA-Forest Service Representative:

On April 4, 2011, PCWA representatives met with Timothy Welch, Carolyn Templeton, and Frank Winchell of the Commission and Doug Hjorth of the Lewis Berger Group (consultant to the Commission) to discuss the Middle Fork American River Project (MFP or Project) relicensing process and schedule. During the meeting, the Commission staff identified additional information needed to conduct their environmental review of the Project. The information needed by the Commission staff was further defined in a memo from the Commission to PCWA dated April 7, 2011. PCWA agreed to file the information with the Commission no later than May 16, 2011.

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Sincerely,

PLACER COUNTY WATER AGENCY



Andrew Fecko
Resource Planning Administrator

Enclosures:

Cover Letter to the FERC's Secretary
Revised Draft HPMP (Contains Privileged Information) – 1 electronic copy
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ENCLOSURES CONTAIN PRIVILEGED INFORMATION

May 12, 2011
File No. 01030A

**Subject: Middle Fork American River Project (FERC Project No. 2079)
Response to FERC Memo Requesting Additional Information**

Dear Tribal Representative:

On April 4, 2011, PCWA representatives met with Timothy Welch, Carolyn Templeton, and Frank Winchell of the Commission and Doug Hjorth of the Lewis Berger Group (consultant to the Commission) to discuss the Middle Fork American River Project (MFP or Project) relicensing process and schedule. During the meeting, the Commission staff identified additional information needed to conduct their environmental review of the Project. The information needed by the Commission staff was further defined in a memo from the Commission to PCWA dated April 7, 2011. PCWA agreed to file the information with the Commission no later than May 16, 2011.

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Sincerely,

PLACER COUNTY WATER AGENCY



Andrew Fecko
Resource Planning Administrator

Enclosures:

Cover Letter to the FERC's Secretary

Revised Draft HPMP (Contains Privileged Information) – 1 electronic copy

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Attachment B
Distribution List

FERC Service List

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Colfax–Todds Valley Consolidated Tribe

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Nisenan Maidu

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United Auburn Indian Community of the Auburn Rancheria

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United Auburn Indian Community Preservation Committee

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Shingle Springs Rancheria

Jeff Murray
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United Auburn Indian Community Preservation Committee

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United Auburn Indian Community Preservation Committee

Sande Delgado
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Washoe Tribe of Nevada & California

Marie Barry
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Native American Tribes (continued)

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Washoe Tribe of Nevada & California

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Auburn Flycasters Granite Bay Flycasters

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California Hydropower Reform Coalition

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Granite Bay Flycasters

Heath Wakelee
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Attachment C
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Attachment C. Literature Cited

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Attachment D

Summary of Proposed FERC Project Boundary Reductions and Associated Rationale

Attachment D. Summary of Proposed FERC Project Boundary Reductions and Associated Rationale.

Project Facilities and Features	Distance between Existing FERC Boundary and Feature/Facility (feet)	Distance between Proposed FERC Boundary and Feature/Facility (feet)	Rationale for Reduction	Map# in PCWA's Application for New License, Volume 3, Exhibit E, Section 4.0
Entire Project Area				
Tunnel Alignments	100 ft. either side of centerline	50 ft. either side of centerline	PCWA does not perform O&M activities in areas overlying tunnel alignments, except where tunnels coincide with surface features such as surge tanks, penstocks, and powerhouses. The proposed FERC Project boundary encompasses sufficient area to cover all Project -related activities in the vicinity of these features.	Map 4-3 series
Reservoir Perimeters	200 ft. from maximum operating level inundation footprint	100 ft. from maximum operating level inundation footprint	<p>According to CFR 18 § 4.41 (h)(2)(i)(B) "the boundary must be located no more than 200 feet (horizontal measurement) from the exterior margin of the reservoir, defined by the normal maximum surface elevation, except where deviations may be necessary in describing the boundary according to the above methods or where additional lands are necessary for project purposes, such as public recreation, shoreline control, or protection of environmental resources." The proposed 100 foot buffer around reservoirs is consistent with this requirement.</p> <p>For Hell Hole Reservoir, the new 100 ft. buffer was calculated from the proposed maximum operating level of 4636' MSL.</p>	Map 4-3 series
Individual Facilities				
Duncan Creek Diversion Area				
No reductions	N/A	N/A	N/A	Map 4-3a
French Meadows Area				
Duncan Creek - Middle Fork Tunnel Portal Road	Approximately 550 ft. from northernmost / 400 ft. from westernmost position of road	Approximately 175 ft. from northernmost / 50 ft. from westernmost position of road	The proposed FERC Project boundary encompasses sufficient area to cover all operation and maintenance (O&M) activities related to the road. The proposed FERC Project retains the area surrounding former dam keeper's cottage.	Map 4-3b
French Meadows Dam Spillway	Approximately 400 ft. from westernmost edge of spillway	Approximately 75 ft. from westernmost edge of spillway	The proposed FERC Project boundary encompasses sufficient area to cover all O&M activities related to spillway, staging area or related roads.	Map 4-3b
French Meadows Dam and Outlet Works (south end)	Approximately 500 ft. from dam shoulder	Approximately 150 ft. from dam shoulder	The proposed FERC Project boundary encompasses sufficient area to cover all O&M activities related to French Meadows Dam and Outlet Works.	Map 4-3b
Gates Group Campground and Access Road	Variable: approximately 100 - 200 ft. from facility footprint and road	Variable: approximately 50 - 100 ft. from facility footprint and road	The existing FERC Project boundary does not cover the entire recreation facility, access road, and related water supply line. Conversely, the existing FERC Project boundary includes areas that are not affected by routine O&M activities. The proposed FERC Project boundary was adjusted to: (1) encompass all areas that are not currently included in the existing FERC Project boundary, with sufficient buffers to cover O&M activities; and (2) exclude areas that are not necessary for routine O&M activities.	Map 4-3e

Attachment D. Summary of Proposed FERC Project Boundary Reductions and Associated Rationale.

Project Facilities and Features	Distance between Existing FERC Boundary and Feature/Facility (feet)	Distance between Proposed FERC Boundary and Feature/Facility (feet)	Rationale for Reduction	Map# in PCWA's Application for New License, Volume 3, Exhibit E, Section 4.0
Individual Facilities (continued)				
Hell Hole Area				
French Meadows Powerhouse Penstock	Variable: approximately 200 - 300 ft. from penstock	Variable: approximately 100 - 150 ft. from penstock	The proposed FERC Project boundary encompasses sufficient area to cover all O&M activities related to the penstock.	Map 4-3f
Dormitory and Cottages Water Supply Tank	Approximately 300 ft. from tank	Approximately 75 ft. from tank	The proposed FERC Project boundary encompasses sufficient area to cover all O&M activities related to the water supply tank and includes access to the tank from FR-2.	Map 4-3g
Hell Hole Dam and Outlet Works (east end)	Variable: approximately 300 - 400 ft. from dam shoulder	Variable: approximately 100 - 200 ft. from dam shoulder	The proposed FERC Project boundary encompasses sufficient area to cover all O&M activities related to dam.	Map 4-3g
Long Canyon Area				
North Fork Long Canyon Crossing Removable Section South Road	Variable: approximately 100 - 150 ft. from road	Variable: approximately 35 - 100 ft. from road	The proposed FERC Project boundary encompasses sufficient area to cover all O&M activities related to the road.	Map 4-3k
Middle Fork Interbay Area				
Middle Fork Interbay Dam and Outlet Works (south end)	Approximately 200 ft. from dam shoulder	Approximately 150 ft. from dam shoulder	The proposed FERC Project boundary encompasses sufficient area to cover any O&M activities related to the dam and slope fence.	Map 4-3m
Middle Fork Powerhouse and Upper and Lower Switchyards	Approximately 200 ft. from Upper Switchyard Slope Fence	Approximately 100 ft. from Upper Switchyard Slope Fence	The proposed FERC Project boundary encompasses sufficient area to cover all O&M activities related to the powerhouse, switchyards, and slope fence.	Map 4-3m
Ralston - Oxbow Area				
Oxbow Powerhouse and Switchyard	Approximately 250 ft. from Oxbow Powerhouse Slope Fence	Approximately 30 ft. from Oxbow Powerhouse Slope Fence	The FERC Project boundary encompasses sufficient area to cover all O&M activities related to the powerhouse, switchyard, or slope fence.	Map 4-3o
Ralston Afterbay Dam and Outlet Works (south end)	Approximately 500 ft. from dam shoulder	Approximately 100 ft. from dam shoulder	The FERC Project boundary encompasses sufficient area to cover all O&M activities related to dam and associated access road.	Map 4-3o

Attachment E

**Revised Table 11-4. Proposed Action – Cost of Environmental Programs, Measures,
and Facilities for the Middle Fork American River Project (2010 Dollars)**

Attachment E. Revised Table 11-4. Proposed Action – Cost of Environmental Programs, Measures, and Facilities for the Middle Fork American River Project (2010 Dollars).

Environmental Program, Measure, or Facility	Total Capital and One-time Costs (2010\$)	Annual O&M Costs ¹ (2010\$)	Total Annualized Costs ² (2010\$)
Compliance			
Additional PCWA Compliance Staff			
Total Compliance Staff		\$420,000	\$420,000
Water and Aquatic Resources			
Implement Instream Flow and Reservoir Minimum Pool Measure ³			
Total IFRMPM	\$2,500,000	\$60,000	\$110,000
Implement Flow and Reservoir Monitoring Plan ⁴			
Total FRMP	\$100,000	\$120,000	\$122,000
Implement Aquatic Monitoring Plans			
Water Temperature	\$56,000	\$43,200	\$44,320
Fish Population		\$57,000	\$57,000
Hardhead Sampling	\$34,000	\$7,000	\$7,680
Entrainment	\$25,000	\$5,000	\$5,500
Foothill Yellow-Legged Frog		\$60,300	\$60,300
Special Purpose - Annual Maintenance Surveys		\$1,890	\$1,890
Geomorphology		\$25,200	\$25,200
Riparian		\$16,800	\$16,800
Benthic Macroinvertebrate Monitoring Plan		\$5,600	\$5,600
Bioaccumulation Monitoring Plan		\$17,000	\$17,000
Water Quality Monitoring		\$22,500	\$22,500
Western Pond Turtle Monitoring Plan		\$20,000	\$20,000
Total Aquatic Monitoring Plans	\$115,000	\$281,490	\$283,790
Implement Sediment Management Plan			
Total SMP	\$5,500	(\$38,930) ⁵	(\$38,820) ⁵
Terrestrial Resources			
Implement Bald Eagle Management Plan			
Total BEMP	\$33,000	\$33,050	\$33,710
Implement Vegetation and Integrated Pest Management Plan			
Vegetation and Integrated Pest Management Plan			
Vegetation Management			
Trimming by Hand and with Equipment (new facilities)		\$18,400	\$18,400
Herbicide and Fungicide Use (new locations)		\$10,100	\$10,100
Noxious Weed Management			
Manual and Chemical Treatment		\$16,150	\$16,150
Monitoring and Reporting of Treated Noxious Weed Populations		\$4,500	\$4,500
Truck and Equipment Cleaning		\$18,500	\$18,500
Noxious Weed Training Program		\$4,800	\$4,800
Pest Management			
Physical Control and Over-the-Counter Rodenticide Use (new facility)		\$500	\$500
Rodenticide Use - Fumigants		\$7,700	\$7,700
Special-Status Plant and Noxious Weed Inventory Surveys		\$60,000	\$60,000
Water Quality Monitoring		\$3,636	\$3,636
Environmental Training Program		\$6,800	\$6,800
Annual Agency Consultation		\$9,000	\$9,000
Total VIPMP	\$0	\$160,086	\$160,086

Attachment E. Revised Table 11-4. Proposed Action – Cost of Environmental Programs, Measures, and Facilities for the Middle Fork American River Project (2010 Dollars).

Environmental Program, Measure, or Facility	Total Capital and One-time Costs (2010\$)	Annual O&M Costs ¹ (2010\$)	Total Annualized Costs ² (2010\$)
Recreation Resources			
Implement Recreation Plan			
Routine Operation and Maintenance		\$75,000	\$75,000
Heavy Maintenance		\$125,000	\$125,000
Removal, Reduction, and Consolidation			
Upper Hell Hole Campground (removal)	\$21,580		\$432
Poppy Campground (reduction)	\$5,200		\$104
Ralston Picnic Area (reduction)	\$1,690		\$34
Hell Hole Campground (reduction)	\$3,380		\$68
Poppy Campground Trailhead and McGuire Boat Ramp Parking Areas (consolidation)	\$165,200		\$3,304
Conversion to Group Site			
McGuire Picnic Area and Beach	\$330,820		\$6,616
Enhancement			
Ahart Campground	\$66,056		\$1,321
Indian Bar Rafting Access	\$149,800		\$2,996
French Meadows Boat Ramp	\$130,000	\$5,200	\$7,800
Hell Hole Boat Ramp	\$225,000	\$2,250	\$6,750
Improvements			
Duncan Creek Diversion Primitive Recreation Site	\$100,800		\$2,016
Ralston Afterbay Sediment Access Point Boat Ramp	\$7,500	\$1,500	\$1,650
Recreation Use Monitoring and Reporting		\$27,120	\$27,120
Project Recreation Opportunity Enhancements			
Dissemination of Real-Time Flow and Reservoir WSE Information		\$20,500	\$20,500
Recreation Opportunity Marketing (maps, brochures)		\$8,500	\$8,500
Fish Stocking		\$34,000	\$34,000
Trail-related Enhancements	\$15,000	\$3,000	\$3,300
Annual Consultation and Reporting		\$12,000	\$12,000
6-Year Reporting		\$4,800	\$4,800
Total Recreation Plan	\$1,222,026	\$318,870	\$343,310
Implement Visual Resource Management Plan			
Total VRMP	\$0	\$9,500	\$9,500
Land Management			
Implement Transportation System Management Plan			
Total TSMP	\$2,100,000	\$77,000	\$119,000
Implement Fire Suppression and Prevention Plan			
Total FPSP	\$0	\$9,000	\$9,000
Cultural Resources			
Implement Historic Properties Management Plan			
Employee Education		\$6,800	\$6,800
Public Education		\$6,150	\$6,150
Avoidance of NHRP-eligible Sites (consultation and buffers)		\$6,000	\$6,000
Monitoring During Heavy Maintenance of Project Recreation Facilities		\$3,600	\$3,600
Cultural Resources Site Condition Monitoring		\$6,100	\$6,100
Additional Cultural Resource Survey		\$730	\$730
Annual Consultation and Reporting		\$12,500	\$12,500
Total HPMP	\$0	\$41,880	\$41,880
TOTAL	\$6,075,526	\$1,491,946	\$1,613,456

¹Operation and maintenance costs annualized over the term of the new license (50 years).²Total one-time capital costs plus total operation and maintenance costs annualized over the term of the new license (50 years).³Capital costs associated with infrastructure modifications necessary to implement new instream flow measures (i.e., outlet works modifications).⁴Capital costs associated with infrastructure modifications necessary to implement Flow and Reservoir Monitoring Plan (i.e., installation of four new gages).⁵Cost Savings

Attachment F

MFP Generation Loss Tables 1 and 2

Attachment F. Table 1. Percent Generation Loss by Powerhouse and Instream Flow Component (1975–2007).

Instream Flow Component	Average Percent Change in Generation by Flow Component					Total Percent Change
	Powerhouse					
	French Meadows	Middle Fork	Ralston	Oxbow	Hell Hole	
Minimum Instream Flows	-3.10%	-3.72%	-3.26%	0.10%	68.28%	-3.17%
Pulse Flows	-1.75%	-1.36%	-1.16%	-0.42%	-0.24%	-1.28%
Spill Downramp	-0.03%	-0.16%	-0.13%	-0.08%	-0.12%	-0.14%
Recreation	0.01%	0.02%	0.04%	0.05%	-0.37%	0.02%
Total All Components	-4.87%	-5.23%	-4.52%	-0.35%	67.55%	-4.56%

Attachment F. Table 2. Percent Generation Loss by Powerhouse, Instream Flow Component, and Water Year Type (1975–2007).

Water Year Type	Powerhouse					Total Percent Change
	French Meadows	Middle Fork	Ralston	Oxbow	Hell Hole	
Minimum Instream Flows						
Wet	-2.76%	-2.57%	-2.31%	-0.13%	77.55%	-2.24%
Above Normal	-2.29%	-5.43%	-4.59%	-0.16%	70.65%	-4.53%
Below Normal	-2.55%	-4.09%	-3.73%	-0.07%	56.46%	-3.48%
Dry	-4.06%	-3.96%	-3.58%	1.03%	54.50%	-3.31%
Critical	-12.76%	-8.18%	-5.74%	1.23%	101.36%	-6.62%
Total All Years	-3.10%	-3.72%	-3.26%	0.10%	68.28%	-3.17%
Pulse Flows						
Wet	-2.44%	-1.61%	-1.44%	-0.56%	-0.34%	-1.57%
Above Normal	-3.09%	-2.34%	-1.91%	-0.60%	-0.45%	-2.16%
Below Normal	0.09%	-0.24%	-0.21%	-0.13%	-0.08%	-0.20%
Dry	0.31%	-0.01%	0.00%	0.00%	-0.02%	0.02%
Critical	0.04%	-0.54%	-0.49%	-0.33%	-0.11%	-0.47%
Total All Years	-1.75%	-1.36%	-1.16%	-0.42%	-0.24%	-1.28%
Spill Downramp						
Wet	-0.05%	-0.26%	-0.21%	-0.15%	-0.32%	-0.23%
Above Normal	0.01%	-0.12%	-0.10%	-0.07%	-0.07%	-0.10%
Below Normal	-0.02%	-0.01%	0.00%	0.01%	0.00%	-0.01%
Dry	-0.09%	-0.10%	-0.09%	-0.05%	-0.01%	-0.09%
Critical	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total All Years	-0.03%	-0.16%	-0.13%	-0.08%	-0.12%	-0.14%
Recreation						
Wet	0.01%	-0.02%	0.00%	0.00%	-0.39%	-0.01%
Above Normal	0.01%	-0.32%	-0.28%	-0.15%	-0.24%	-0.28%
Below Normal	0.00%	-0.41%	-0.35%	-0.19%	-0.32%	-0.35%
Dry	0.00%	0.49%	0.46%	0.30%	-0.31%	0.43%
Critical	0.00%	1.04%	1.02%	0.72%	-0.93%	0.94%
Total All Years	0.01%	0.02%	0.04%	0.05%	-0.37%	0.02%
Total All Instream Flow Components						
Wet	-5.23%	-4.47%	-3.96%	-0.83%	76.49%	-4.06%
Above Normal	-5.36%	-8.21%	-6.88%	-0.98%	69.89%	-7.07%
Below Normal	-2.47%	-4.75%	-4.29%	-0.38%	56.06%	-4.04%
Dry	-3.84%	-3.58%	-3.21%	1.27%	54.16%	-2.95%
Critical	-12.71%	-7.67%	-5.21%	1.62%	100.31%	-6.15%
Total All Years	-4.87%	-5.23%	-4.52%	-0.35%	67.55%	-4.56%