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October 1, 2012
File No. 01030A
Electronically Filed

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

SUBJECT: Placer County Water Agency's Comments on the Federal Energy Regulatory Commission's Draft Environmental Impact Statement (FERC Project No. 2079-069)

Dear Secretary Bose:

Placer County Water Agency (PCWA) is pleased to file comments on the Federal Energy Regulatory Commission's (Commission or FERC) Draft Environmental Impact Statement (DEIS) for Hydropower License — Middle Fork American River Project (MFP) (FERC Project No. 2079-069) issued July 23, 2012. The MFP is being relicensed by PCWA using the Commission's Integrated Licensing Process (ILP).

PCWA appreciates the Commission staff's efforts in preparing the DEIS. PCWA requests renewal of its license to continue operation and maintenance of the MFP with a license term of 50 years. The new license term requested by PCWA is based on the substantial costs associated with: (1) relicensing the MFP; (2) capital improvements; (3) new environmental measures, programs, and facilities; and (4) extensive monitoring and on-going resource agency consultation to ensure continued resource protection over the term of the new license.

PCWA's comments on the Commission's DEIS are compiled in the enclosed table. Each comment is presented in the order that it appears in the Commission's Adobe PDF version of the document posted on the Commission's eLibrary, and is referenced by section, page, paragraph, and line number, as appropriate. The table includes statements from the DEIS and PCWA's recommended revisions in redline/strike-through format. In addition, each comment is categorized as a clarification, typographical error, updated information, or an important omission, as appropriate, followed by PCWA's rationale. PCWA respectively requests that the Commission incorporate the recommended revisions into the Final EIS.

Utilizing the Commission's eFiling system, PCWA eFiled these comments on the DEIS to the Commission's Secretary. Courtesy copies of the comments (1 paper copy and 1 electronic copy) have also been mailed via courier service (concurrent with this filing) to the Commission's Office of Energy Projects and Commission's Office of General Counsel-Energy Projects. In addition, PCWA provided a copy of this filing to each party designated on the attached distribution list (Attachment 1) via eService, or by mailing paper/electronic copies. The Certificate of Service is provided in Attachment 2.

If you have any questions regarding this filing, please contact me at (530) 823-4889 or by e-mail at afecko@pcwa.net.

Sincerely,

Andrew Fecko
Resource Planning Administrator

Enclosure

PCWA's Recommended Revisions to the Commission's Draft Environmental Impact Statement

Attachments

Attachment 1 – Distribution List
Attachment 2 – Certificate of Service

Enclosure

PCWA's Recommended Revisions to FERC's Draft Environmental Impact Statement.

DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
EXECUTIVE SUMMARY				
Executive Summary	Page xxv Paragraph 7 Line 4 Page xxviii Paragraph 1 Line 4	These effects would include those associated with reservoir drawdown for operation and maintenance purposes (i.e., FS-05-03-55-684 and FS- FS-05-03-55-689), recreation activities, including trail maintenance and alignment (PL-03 and PL-19), and road construction (FS-05-03-55-495) and documentation of California State Historic Preservation Office (California SHPO) concurrence with all National Register recommendations;	These effects would include those associated with recreation and/or reservoir drawdown for operation and maintenance purposes (i.e., FS-05-03-55-684 and FS- FS-05-03-55-689); ~~recreation activities , including~~ trail maintenance ~~and alignment~~ (~~PL-03 and~~ PL-19); gage maintenance (PL-03); and road ~~construction~~ maintenance/ trail upgrades ~~(FS-05-03-55-495)~~ (FS-05-17-54-495) and documentation of California State Historic Preservation Office (California SHPO) concurrence with all National Register recommendations;	**Clarification.** The DEIS incorrectly refers to Site FS-05-17-54-495 as FS-05-03-55-495. Site FS-05-17-54-495 is a historic mining ditch located near a project diversion. This ditch crosses a project road and trail. The ditch could potentially be affected by maintenance of the road and upgrades to the existing trail. PL-03 is a historic mining site located on private property (not owned by PCWA) outside of the FERC Project boundary. This resource could potentially be affected by maintenance of a gage. *Reference: PCWA, Final Historic Properties Management Plan, Pages 29-30 and Table 1, September 2012.*
Executive Summary	Page xxiii Paragraph 3 Bullet 5	• After the first two downramping events at French Meadows and Hell Hole dams, provide a report to the agencies and Commission documenting PCWA's ability to manage spill flows to provide the specified ramping rates and, if appropriate, make recommendations for ramping rate modifications.	• During the first two spill events when down ramp of spill flows occur at Hell Hole and French Meadows reservoirs, the Licensee will test their ability to manage spill flows to provide the specified flow schedules. After the first two downramping events at French Meadows and Hell Hole dams, PCWA will provide a testing report to the agencies and Commission documenting PCWA's ability to manage spill flows. After the second spill event, the Licensee may recommend modifications to ~~provide the specified~~ ramping rates. ~~and, if appropriate, make recommendations for ramping rate modifications.~~	**Clarification.** PCWA's recommended revisions are consistent with the ramping rate testing program specified in PCWA's Alternative Filing, Attachment C4 – Condition No. 24, Pages 21-22 and is consistent with the USDA-FS Preliminary Terms and Conditions, Condition No. 24. The recommended changes clarify that PCWA will be testing their ability to provide the specified ramping rates during the first two spill events. *Reference: PCWA, Submittal of Alternative Conditions, Attachment C4, PCWA Alternative Condition No. 24 – Ramping Rates, Pages 21-22, September 2011.*
SECTION 1.0 INTRODUCTION				
1.1 Application	Page 2 Figure 1	**Map label**: Duncan Creek – French Meadows Tunnel	**Map label**: Duncan Creek – ~~French Meadows Tunnel~~ Middle Fork Tunnel	**Typographical Error.** *Reference: PCWA, Final License Application, Map 3-2a, February 2011.*
1.2.1 Purpose of Action	Page 3 Paragraph 2	Issuing a new license for the Middle Fork Project would allow PCWA to continue generating electricity for the term of a new license, making electrical power from a renewable resource available to its customers.	Issuing a new license for the Middle Fork Project would allow PCWA to continue generating electricity for the term of a new license, making electrical power from a renewable resource available to ~~its customers.~~ the California electrical grid.	**Clarification.** PCWA is an independent generator (wholesaler of electricity) that sells electricity to California's electrical retailers. *Reference: PCWA, Final License Application, Section 2.2, Page 2-2 and 2-3, February 2011.*
1.3 Statutory and Regulatory Requirements	Page 4 Table 1 Row 4 Column 3	**Requirement**: Clean Water Act-Water Quality Certification **Status**: Application for water quality certification accepted on July 18, 2011	**Requirement**: Clean Water Act-Water Quality Certification **Status**: Original application for water quality certification accepted on July 18, 2011; timely withdrawal and re-filing of application for water quality certification accepted on June 21, 2012.	**Updated Information.** *Reference: Response letter from SWB filed with FERC on June 26, 2012.*
1.3.2 Clean Water Act	Page 6	Under section 401 of the Clean Water Act, a license applicant must obtain certification from the appropriate state pollution control agency verifying compliance with the Clean Water Act. On July 15, 2011, PCWA applied to the State Water Resources Control Board (Water Board) for 401 water quality certification for the Middle Fork American River Project. The Water Board received this request on July 18, 2011. The Water Board has until July 18, 2012, to act on the request.	Under section 401 of the Clean Water Act, a license applicant must obtain certification from the appropriate state pollution control agency verifying compliance with the Clean Water Act. On July 15, 2011, PCWA applied to the State Water Resources Control Board (Water Board) for 401 water quality certification for the Middle Fork American River Project. The Water Board received this request on July 18, 2011. ~~The Water Board has until July 18, 2012, to act on the request.~~ On June 12, 2012, PCWA simultaneously withdrew and re-filed its request for 401 water quality certification for the Middle Fork American River Project. The Water Board received this request on June 12, 2012. The Water Board has until June 12, 2013 to act on the request.	**Updated Information.** *Reference: Response letter from SWB filed with FERC on June 26, 2012.*
SECTION 2.0 PROPOSED ACTION AND ALTERNATIVES				
2.1.1.2 Hell Hole Development	Page 13 Paragraph 2 Line 1	The Hell Hole development is located southwest of the French Meadows development on the Rubicon River and includes:	The Hell Hole development is located ~~southwest~~ southeast of the French Meadows development on the Rubicon River and includes:	**Typographical Error.** *Reference: PCWA, Final License Application, Section 3.0 Map 3-1, February 2011.*
2.1.1.3 Middle Fork Development	Page 13-14 Paragraph 3 Line 23	(5) a 07-mile penstock conveying water to the Middle Fork powerhouse	(5) a ~~07-mile~~ 0.7-mile penstock conveying water to the Middle Fork powerhouse	**Typographical Error.** *Reference: PCWA, Final License Application, Section 3.0, Table 3-4, February 2011.*
2.1.3 Existing Project Boundary	Page 16 Paragraph 1 Line 2	The existing project boundary includes a total of 4,554 acres of land; 3,268 acres are lands of the United States managed by the Forest Service, and 1,286 acres are owned by PCWA.	The existing project boundary includes a total of 4,554 acres of land; 3,268 acres are lands of the United States managed by the Forest Service, and 1,286 acres are owned by PCWA or private parties.	**Clarification.** The remaining 1,286 acres of land within the project boundary that are not managed by USDA-FS include lands owned by PCWA as well as private parties. *Reference: PCWA, Final License Application, Section 1.0, February 2011.*

PCWA's Recommended Revisions to FERC's Draft Environmental Impact Statement.

DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
2.2.2 Proposed Project Boundary	Page 24 Paragraph 2 Bullet 5 and 6	Areas where land within the project boundary would be reduced include: • Duncan Creek-Middle Fork tunnel corridor . . . • Ralston afterbay shoreline buffer	The following location should be added to the list of areas where a project boundary reduction would occur: • Middle Fork Interbay Shoreline Buffer	**Clarification.** *Reference: PCWA, Final License Application, Map 4-3m, February 2011.*
2.2 Applicant's Proposal 2.2.4 Proposed Environmental Measures	Page 26 Below second bullet	• Develop an erosion control plan to be approved by the Commission. • Implement the proposed pulse flows shown in table 3.3.1-2 of this EIS.	• Develop an erosion control plan to be approved by the Commission. **Aquatic Resources** • Implement the proposed pulse flows shown in table 3.3.1-2 of this EIS.	**Clarification.** The addition of this heading provides clarity to the text.
2.2 Applicant's Proposal 2.2.5 Modifications to Applicant's Proposal - Mandatory Conditions	Page 27 Paragraph 2 Bullet 4	• Condition no. 22: Implement the Alternative 1 minimum flows shown in table 5-3 of this EIS.	• Condition no. 22: Implement the Alternative 1 minimum flows shown in table 5-~~3~~2 of this EIS.	**Clarification.** FERC's staff recommended minimum instream flows are provided in Table 5-2 on pages 319-321 in the DEIS. *Reference: FERC, Draft Environmental Impact Statement for Hydropower License, Middle Fork American River Hydroelectric Project – FERC Project No. 2079-069, July 2012.*
2.2 Applicant's Proposal 2.2.5 Modifications to Applicant's Proposal - Mandatory Conditions	Page 27 Paragraph 2 Bullet 7	• Condition no. 25: Release the peaking reach minimum flows specified in table 5-3 during planned annual outages and concurrent unplanned outages at Middle Fork and Ralston powerhouses during May through September ….	• Condition no. 25: Release the peaking reach minimum flows specified in table 5-~~3~~2 during planned annual outages and concurrent unplanned outages at Middle Fork and Ralston powerhouses during May through September ….	**Clarification.** FERC's staff recommended minimum instream flows are provided in Table 5-2 on pages 319-321 in the DEIS. Table 5-3 on page 324 is not the correct table. *Reference: FERC, Draft Environmental Impact Statement for Hydropower License, Middle Fork American River Hydroelectric Project – FERC Project No. 2079-069, July 2012.*
2.4 Staff Alternative	Page 30 Paragraph 1 Bullet 5	• After the first two downramping events at French Meadows and Hell Hole dams, provide a report to the agencies and Commission documenting PCWA's ability to manage spill flows to provide the specified ramping rates and, if appropriate, make recommendations for ramping rate modifications.	• During the first two spill events when down ramp of spill flows occur at Hell Hole and French Meadows reservoirs, the Licensee will test their ability to manage spill flows to provide the specified flow schedules. After the first two downramping events at French Meadows and Hell Hole dams, PCWA will provide a testing report to the agencies and Commission documenting PCWA's ability to manage spill flows. After the second spill event, the Licensee may recommend modifications to ~~provide the specified~~ ramping rates. ~~and, if appropriate, make recommendations for ramping rate modifications.~~	**Clarification.** PCWA's recommended revisions are consistent with the ramping rate testing program specified in PCWA's Alternative Filing, Attachment C4 – Condition No. 24, Pages 21-22 and is consistent with the USDA-FS Preliminary Terms and Conditions, Condition No. 24. The recommended changes clarify that PCWA will be testing their ability to provide the specified ramping rates during the first two spill events. *Reference: PCWA, Submittal of Alternative Conditions, Attachment C4, PCWA Alternative Condition No. 24 – Ramping Rates, Pages 21-22, September 2011.*
2.4 Staff Alternative	Page 32 Paragraph 7 Line 3	These effects would include those associated with reservoir drawdown for operation and maintenance purposes (i.e., FS-05-03-55-684 and FS- FS-05-03-55-689), recreation activities, including trail maintenance and alignment (PL-03 and PL-19), and road construction (FS-05-03-55-495) and documentation of California State Historic Preservation Office (California SHPO) concurrence with all National Register recommendations;	These effects would include those associated with recreation and/or reservoir drawdown for operation and maintenance purposes (i.e., FS-05-03-55-684 and FS- FS-05-03-55-689); ~~recreation activities , including~~ trail maintenance ~~and alignment~~ (~~PL-03 and~~ PL-19); gage maintenance (PL-03); and road ~~construction~~ maintenance/ trail upgrades ~~(FS-05-03-55-495)~~ (FS-05-17-54-495) and documentation of California State Historic Preservation Office (California SHPO) concurrence with all National Register recommendations;	**Clarification.** The DEIS incorrectly refers to Site FS-05-17-54-495 as FS-05-03-55-495. Site FS-05-17-54-495 is a historic mining ditch located near a project diversion. This ditch crosses a project road and trail. The ditch could potentially be affected by maintenance of the road and upgrades to the existing trail. PL-03 is a historic mining site located on private property (not owned by PCWA) outside of the FERC Project boundary. This resource could potentially be affected by maintenance of a project gage. *Reference: PCWA, Final Historic Properties Management Plan, Pages 29-30 and Table 1, September 2012.*
SECTION 3.0 ENVIRONMENTAL ANALYSIS				
3.1 General Description of the River Basin	Page 35 Paragraph 3 Line 3	The downstream-most project development, Oxford powerhouse, is at river mile (RM) 24, as measured from the confluence with the North Fork American River.	The downstream-most project development, ~~Oxford~~ Oxbow powerhouse, is at river mile (RM) 24, as measured from the confluence with the North Fork American River.	**Typographical Error.** *Reference: PCWA, Final License Application, Map 7.1-1, February 2011.*
3.3.1 Geologic and Soil Resources 3.3.1.1 Affected Environment Soils	Page 38 Paragraph 4 Line 2	Soils surrounding the project facilities, reservoirs, and bypassed reaches generally consist of well-drained, sandy to silty loams forming steep slopes.	Soils surrounding the project facilities, reservoirs, and bypassed reaches generally consist of ~~well-drained~~ highly erodible, sandy to silty loams forming steep unstable slopes.	**Clarification.** *Reference: PCWA, Final License Application, Section 7.2.6, Page 7.2-6, February 2011.*
3.3.1 Geologic and Soil Resources 3.3.1.1 Affected Environment Geomorphology *Stream Channel Characterization*	Page 39 Paragraph 3 Line 7	A 1.2-mile-long section within the peaking reach known as Ruck-a-Chucky Rapids is a moderately steep and entrenched channel with debris constrictions and no bars.	A 1.2-mile-long section within the peaking reach known as Ruck-a-Chucky Rapids is a moderately steep and entrenched channel with large substrate debris constrictions (e.g., delivered to the channel by rockfalls) and no bars.	**Clarification.** FERC staff's characterization of the large boulders within the Ruck-a-Chucky Rapids reach as 'debris' does not indicate the source. This is an important clarification because the 'debris' is natural hill slope and channel processes substrates. The source of the large boulders in this reach was described in Section 7.7.2.2 in PCWA's Final License Application. *Reference: PCWA, Final License Application, Section 7.7.2.2, Page 7.7-3, February 2011.*
3.3.1 Geologic and Soil Resources 3.3.1.1 Affected Environment Geomorphology *Stream Channel Characterization*	Page 39 Paragraph 4 Line 2	Overall, the findings indicated that LWD was most prevalent in the upper reaches downstream of diversions and dams (particularly the Middle Fork American River downstream of French Meadows dam, 87.86 pieces per mile, and the Rubicon River downstream of Hell Hole dam, 24.01 pieces per mile).	Overall, the findings indicated that LWD was most prevalent in the upper reaches downstream of diversions and dams (particularly the Middle Fork American River ~~downstream of~~ between French Meadows dam and Middle Fork Interbay, 87.86 pieces per mile, and the Rubicon River, within the approximately 6 mile reach immediately downstream of Hell Hole dam, 24.01 pieces per mile).	**Clarification.** The suggested revision clarifies the locations of the reaches where the abundances of large woody debris specified in the DEIS were documented during field surveys (Tables 4-1 and 4-16 in PCWA's 2007 Physical Habitat Characterization Report). *Reference: PCWA, Pre-Application Document, Supporting Document G, 2006 Physical Habitat Characterization Report dated June 2007, Table 4-1 (Page 176) and Table 4-16 (Page 191), December 2007.*
3.3.1 Geologic and Soil Resources 3.3.1.1 Affected Environment Geomorphology *Stream Channel Characterization*	Page 45 Table 3.3.1-1 Footnote A	[a] Q – 1 TSR, Table G-1 (PCWA, 2011b).	[a] AQ – 1 TSR, Table G-1 (PCWA, 2011b).	**Typographical Error.**

PCWA's Recommended Revisions to FERC's Draft Environmental Impact Statement.

DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
3.3.1 Geologic and Soil Resources 3.3.1.1 Affected Environment Geomorphology *Large Woody Debris Capture and Management in Project Reservoirs and Diversion Pools*	Page 47 Paragraph 3 Line 7	Larger amounts of LWD have been observed in Hell Hole reservoir (40 to 50 pieces) and French Meadows reservoir (100-150 pieces).	Larger amounts of LWD have been observed in Hell Hole reservoir (40 to 50 pieces) and French Meadows reservoir (~~100-150 pieces~~150-250 pieces).	**Clarification.** As summarized in Table 7.7.14 in PCWA's Final License Application, approximately 1 piece of large woody debris was observed every 200 to 300 feet along the French Meadows Reservoir shoreline. This is approximately 150-250 pieces in total for the entire shoreline. *Reference: PCWA, Final License Application, Section 7.7.9, Page 7.7-22, Table 7.7.14, February 2011.*
3.3.1 Geologic and Soil Resources 3.3.1.2 Environmental Effects Sediment Management Channel Responses to Altered Flow Conditions	Page 54 Paragraph 1 Line 1	PCWA proposes new pulse flows that would affect channel morphology and bed surface textures in the bypassed.	PCWA proposes new pulse flows that would affect channel morphology and bed surface textures in the bypassed reaches.	**Typographical Error.**
3.3.1 Geologic and Soil Resources 3.3.1.2 Environmental Effects Sediment Management Channel Responses to Altered Flow Conditions	Page 56 Table 3.3.1-3 Rows 2 and 4 Column 4	**Project Location**: Middle Fork American River below French Meadows dam **Measurement Location**: USGS gage no. 11427500 and a new gage at French Meadows dam **Project Location**: Rubicon River below Hell Hole reservoir dam **Measurement Location**: USGS gage no. 11428800 and new gages in the Rubicon River below Hell Hole reservoir dam	**Project Location**: Middle Fork American River below French Meadows dam **Measurement Location**: USGS gage no. 11427500 beginning in Year 1 after license issuance and a new gage at French Meadows dam in year 3 after license issuance **Project Location**: Rubicon River below Hell Hole reservoir dam **Measurement Location**: ~~USGS gage no. 11428800 and~~ New gages ~~in the Rubicon River below Hell Hole reservoir dam~~ at Hell Hole Dam Spillway, on the instream flow pipe, and on the low-level outlet in year 6 after license issuance.	**Clarification.** It is unclear in Table 3.3.1-3 which compliance gages will be used at different periods of time in the implementation schedule. PCWA's suggested revisions provide clarification on the gages that will be used for compliance prior to completion of infrastructure modifications at the outlet structures, as described in Table 1 in the Streamflow and Reservoir Elevation Gaging Plan in PCWA's Submittal of Alternative Conditions. The recommended revisions are also consistent with the USDA-FS preliminary terms and conditions, filed on 8/4/11. *Reference: PCWA, Submittal of Alternative Conditions, Streamflow and Reservoir Elevation Gaging Plan, Attachment D8, SREGP Table 1, Page 1, September 2011.*
3.3.1 Geologic and Soil Resources 3.3.1.2 Environmental Effects Channel Responses to Altered Flow Conditions *Our Analysis*	Page 58 Paragraph 5 Line 2	This later initiation of pulse flows would provide more time rainbow trout fry to emerge from the gravel prior to a planned high flow event.	This later initiation of pulse flows would occur prior to FYLF breeding and will protect FYLF populations. The pulse flows will also occur prior to rainbow trout fry emergence in the bypass reaches (similar to natural conditions). Further, the magnitude of the pulse flows is designed to mobilize, but not scour, gravels, therefore, redds should be protected. ~~provide more time rainbow trout fry to emerge from the gravel prior to a planned high flow event.~~	**Clarification.** As discussed in Section 3.5, page 3.5-20 in PCWA's Supplemental Filing, the pulse flows are timed to start prior to FYLF breeding initiation'. In addition, as discussed in Section 3.5, page 3.5-17, the Alternative 1 pulse flows 'were designed to initiate motion of gravels (clean fines from gravels), but not excessively remove gravel substrates from the system.' Rainbow trout emergence from gravels in the bypass reaches occurs after initiation of the pulse flows (typically early to late June). However, pulse flows are designed to minimize deep scouring of gravels. *References: PCWA, Final License Application, Supporting Document B, AQ 2 – Fish Populations Technical Study Report, February 2011. (Section 6.7.1, pg 23)* *PCWA, Supplemental Filing, Section 3.5.9.2, Special-Status Species, Foothill Yellow-legged Frog, Pages 3.5-29 and 30, November 2011.* *PCWA, Supplemental Filing, Section 3.5.3.3, Bypass Reach Habitat, Rainbow Trout Spawning, Scour, Pages 3.5-17, November 2011.*
3.3.2 Aquatic Resources 3.3.2.1 Affected Environment Water Quantity *Bypassed and Peaking Reaches*	Page 80 Paragraph 2 Bullet 3	The permits and license also require:…. • minimum pool and minimum instream flow requirements (see table 3.3.2-2);	The permits and license also require:… • minimum pool and minimum instream flow requirements (see tables 3.3.2-2 and 3.3-2-4, respectively);	**Clarification.** In FERC's Draft EIS, minimum pool requirements are provided in Table 3.3.2-2 and the minimum stream maintenance flow requirements are provided in Table 3.3.2-4. *Reference: FERC, Draft Environmental Impact Statement for Hydropower License, Section 3.2.2, Pages 65 and 75, July 2012.*
3.3.2 Aquatic Resources 3.3.2.1 Affected Environment Water Quantity *Bypassed and Peaking Reaches*	Page 81 Table 3.3.2-6 Row 5 Column 2	**Permit/License No**.: 13856 **Type of Use**:	**Permit/License No**.: 13856 **Type of Use**: Irrigation, and Incidental Domestic, Recreational, Municipal and Industrial	**Important Omission.** Table 3-15 in PCWA's Final License Application identifies the type of use for PCWA's water rights permit 13856. *Reference: PCWA, Final License Application, Section 3.5.2.1, Page 3-37 and 3-38, Table 3-15, February 2011.*
3.3.2 Aquatic Resources 3.3.2.1 Affected Environment Water Quantity *Bypassed and Peaking Reaches*	Page 82 Table 3.3.2-6 Row 7 Column 1	**Permit/License No**.: 13855/13858	**Permit/License No**.: 13855 ~~/~~ -13858	**Clarification.** As correctly stated on page 80 in FERC's Draft EIS and in PCWA's Final License Application Table 3-15, the water rights permit numbers include 13855, 13856, 13857, and 13858. *Reference: PCWA, Final License Application, Section 3.5.2.1, Page 3-37 and 3-38, Table 3-15, February 2011.*
3.3.2 Aquatic Resources 3.3.2.1 Affected Environment Water Quality	Page 86 Paragraph 3 Line 5	During the 2005 through 2008 sampling period, DO profiles in French Meadows and Hell Hole reservoirs showed levels typically greater than the 7 mg/L water quality objective in the upper portion of the water column, with lower levels that do not meet basin plan objectives in the hypolimnion nearer the reservoir bottom.	During the 2005 through 2008 sampling period, DO profiles in French Meadows and Hell Hole reservoirs showed levels typically greater than the 7 mg/L water quality objective in the upper portion of the water column, with lower levels that periodically do not meet basin plan objectives in the hypolimnion nearer the reservoir bottom.	**Clarification.** The additional text clarifies that all the DO measurements were not below basin plan objectives, consistent with the information provided in Section 7.5.10.1 in PCWA's Final License Application. *Reference: PCWA, Final License Application, Section 7.5.10.1, Page 7.5-33 and 7.5-34, February 2011.*

PCWA's Recommended Revisions to FERC's Draft Environmental Impact Statement.

DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
3.3.2 Aquatic Resources 3.3.2.1 Affected Environment Fisheries *Special-status Aquatic Species*	Page 95 Paragraph 8 Line 1	Data from previous fish surveys indicates that hardhead may also be present in stream reaches where they were not found during the 2007–2009 fish population sampling. Hardhead were previously documented in the mainstem Middle Fork American River between French Meadows reservoir and the Middle Fork interbay, and in the Rubicon River upstream of Hell Hole reservoir and downstream of the dam to the Middle Fork American River (El Dorado National Forest, 1977; Tahoe National Forest, 2003, both as cited in PCWA, 2007b).	Reference documents ~~Data from previous fish surveys~~ indicate~~s~~ that hardhead may also be present in stream reaches where they were not found during the 2007-2009 fish population sampling. Hardhead were previously reported to potentially be present ~~documented~~ in the mainstem Middle Fork American River between French Meadows reservoir and the Middle Fork interbay, and in the Rubicon River upstream of Hell Hole reservoir and downstream of the dam to the Middle Fork American River (El Dorado National Forest, 1977; Tahoe National Forest, 2003, both as cited in PCWA, 2007b). However, extensive sampling in 2007-2009 determined that hardhead are only present in the Middle Fork American River downstream of a large natural fish barrier located approximately 0.5 miles above Ralston afterbay and in the Rubicon River downstream of a natural low flow barrier, 5.4 miles upstream of Ralston afterbay.	**Clarification.** The statement in the DEIS may have been deduced from statements in the PAD or other documents, but it is incorrect. The documents cited are very general, high level overview documents. The El Dorado National Forest, 1977, document does not mention hardhead. The Tahoe National Forest, 2003, document says that "hardhead has been identified from the Middle Fork American River downstream of French Meadows Reservoir and likely occurs throughout the river." It is true that hardhead were and are present in the Middle Fork American River, however, extensive sampling in 2007-2009 clearly determined that they are only present in the Middle Fork American River downstream of a large natural fish barrier located approximately 0.5 miles above Ralston Afterbay and in the Rubicon River below a low flow natural barrier 5.4 miles upstream of Ralston afterbay. *References: PCWA, Final License Application, Supporting Document B, AQ 2 – Fish Populations Technical Study Report, February 2011.* *PCWA, Final License Application, Supporting Document B, AQ 6 – Fish Passage Technical Study Report, February 2011, pg. 12.* *PCWA, Final License Application, Section 7.5 .8 Fish and Aquatic Resources – Riverine Fish; Table 7.5-7. Hardhead and Pikeminnow Observations from Quantitative and Qualitative Fish Sampling, page 7.5-9, February 2011.*
3.3.2 Aquatic Resources 3.3.2.2 Environmental Effects Protecting Water Quality During Sediment Management	Page 97 Paragraph 4 Line 5	During sediment removal activities at these two medium reservoirs, a portion of the removed material (preferentially selected within the preferred spawning particle size requirements of aquatic resources) would be placed in the new sediment augmentation areas below Middle Fork interbay.	During sediment removal activities at these two medium reservoirs, a portion of the removed material (preferentially selected within the preferred spawning particle size requirements of aquatic resources) would be placed in the new sediment augmentation areas below Middle Fork interbay and Ralston afterbay.	**Clarification.** Augmentation areas are proposed downstream of both Middle Fork interbay and Ralston afterbay dams. *Reference: PCWA, Final License Application, Supporting Document A, Sediment Management Plan, Section 3.0, Page 3, February 2011.*
3.3.2 Aquatic Resources 3.3.2.2 Environmental Effects Minimum Instream F lows *Our Analysis*	Page 104 Table 3.3.2-8 Row 1 Columns 3-14	**Location**: Duncan Creek below Duncan diversion dam **Water Year Type**: E/C	**Location**: Duncan Creek below Duncan diversion dam **Water Year Type**: E/C (add grey shading to row)	**Clarification.** Enclosure 1 and Attachment C of PCWA's Supplemental Filing both specify 'or natural inflow' for minimum instream flows in Duncan Creek below the Duncan Creek Diversion Dam in all water year types. *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 22 – Minimum Streamflows, Page 16, August 2011.*
3.3.2 Aquatic Resources 3.3.2.2 Environmental Effects Minimum Instream F lows *Our Analysis*	Page 105 Table 3.3.2-8 Row 4 Columns 11-14	**Location**: American River below Middle Fork interbay dam **Water Year Type**: AN May 1-14: 65(45) May 15-31: 65(45) June 1-14: 45(26) June 15-30: 45(26)	**Location**: American River below Middle Fork interbay dam **Water Year Type**: AN May 1-14: 65~~(45)~~ May 15-31: 65~~(45)~~ June 1-14: 45~~(26)~~ June 15-30: 45~~(26)~~	**Clarification.** FERC's DEIS reflects the minimum instream flows recommended by the USDA-FS in their preliminary 4(e) conditions. PCWA believes that, in this case, the Forest Service made a typographical error. *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 22 – Minimum Streamflows, Page 17, August 2011.*
3.3.2 Aquatic Resources 3.3.2.2 Environmental Effects Minimum Instream Flows *Our Analysis*	Page 107 Paragraph 2 Line 5	For the reasons stated in the previous paragraph, this prevailing higher minimum flow would result in the Alternative 1 regime providing minor habitat enhancements compared with the proposed flow regime. However, we expect the primary factor that would limit the quality and quantity of aquatic habitat in the peaking reach to be flow fluctuations, rather than minimum flows. Daily peaking flow fluctuations would be maintained under both action alternatives, and effects of the new minimum flow regime in the peaking reach on fish and other aquatic biota are expected to be negligible because changes in wetted habitat area would be of very short duration and likely insufficient to affect behavior (e.g., foraging), food availability, or production of aquatic biota.	For the reasons stated in the previous paragraph, this prevailing higher minimum flow would result in the Alternative 1 regime providing minor habitat enhancements compared with the proposed flow regime. However, the increased minimum flows in the proposed and Alternative 1 flow regimes compared to the existing conditions minimum flow (75 cfs) would substantially reduce the magnitude of flow fluctuations and would benefit aquatic biota. ~~However, we expect the primary factor that would limit the quality and quantity of aquatic habitat in the peaking reach to be flow fluctuations, rather than minimum flows. Daily peaking flow fluctuations would be maintained under both action alternatives, and effects of the new minimum flow regime in the peaking reach on fish and other aquatic biota are expected to be negligible because changes in wetted habitat area would be of very short duration and likely insufficient to affect behavior (e.g., foraging), food availability, or production of aquatic biota.~~	**Clarification.** The increased minimum flows in the peaking reach under both the Proposed and Alternative 1 minimum flows were designed to reduce flow fluctuations and benefit aquatic species compared to Existing Conditions. *References: PCWA, Final License Application, Sections 8.5.1, 8.5.2, and 8.5.3, February 2011.* *PCWA, Supplemental Filing, Sections 3.5.1, 3.5.2, and 3.5.3, November 2011.*
3.3.2 Aquatic Resources 3.3.2.2 Environmental Effects Minimum Instream Flows *Our Analysis*	Page 108 Paragraph 2 Line 1	The proposed and Alternative 1 minimum instream flows are also designed to provide temperatures that support hardhead spawning.	The proposed and Alternative 1 minimum instream flows are also designed to provide temperatures that support hardhead ~~spawning~~.	**Clarification.** *References: PCWA, Final License Application, Section 8.5.9.1, Special-Status Species, Hardhead, Pages 8.5-30 and 31, February 2011.* *PCWA, Supplemental Filing, Section 3.5.9.1, Special-Status Species, Hardhead, Pages 3.5-29 and 30, November 2011.*

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DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
3.3.2 Aquatic Resources 3.3.2.2. Environmental Effects Effects of Ramping Rates on Aquatic Biota	Page 110 Table 3.3.2-9 Column 2 Row 5	**Location**: Rubicon River below Hell Hole reservoir dam **Schedule**: Day 9 **Action**: Reduce the flow to a minimum of 170 cfs.	**Location**: Rubicon River below Hell Hole reservoir dam **Schedule**: Day ~~9~~10 **Action**: Reduce the flow to a minimum of 170 cfs.	**Clarification.** PCWA's recommended changes are the same as the spill event down ramp schedule provided in PCWA's Alternative Filing, Attachment C4 – Condition No. 24, Page 23 and with the USDA-FS Preliminary Terms and Conditions, Condition No. 24, filed on 8/4/11. *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Page 31, August 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C4, PCWA Alternative Condition No. 24 – Ramping Rates, Pages 22, September 2011.*
3.3.2 Aquatic Resources 3.3.2.2. Environmental Effects Effects of Ramping Rates on Aquatic Biota	Page 110 Table 3.3.2-9 Column 2 Rows 14-19	**Location**: Middle Fork American River below French Meadows reservoir dam **Schedule:** Day 1. Release a minimum flow of 400 cfs Day 5. Reduce the flow to a minimum of 275 cfs. Day 7. Reduce the flow to a minimum of 190 cfs. Day 9. Reduce the flow to a minimum of 115 cfs. Day 13. Reduce the flow to a minimum of 65 cfs. Day 15. Release minimum streamflow requirement.	**Location**: Middle Fork American River below French Meadows reservoir dam **Schedule**: Day 1. Release a minimum flow of 400 cfs Day ~~5~~2. Reduce the flow to a minimum of 275 cfs. Day ~~7~~3. Reduce the flow to a minimum of 190 cfs. Day ~~9~~4. Reduce the flow to a minimum of 115 cfs. Day ~~13~~5. Reduce the flow to a minimum of 65 cfs. Day ~~15~~7. Release minimum streamflow requirement.	**Clarification.** PCWA's recommended changes are the same as the spill event down ramp schedule provided in PCWA's Alternative Filing, Attachment C4 – Condition No. 24, Page 23 and with the USDA-FS Preliminary Terms and Conditions, Condition No. 24, filed on 8/4/11. *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Page 32, August 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C4, PCWA Alternative Condition No. 24 – Ramping Rates, Pages 23, September 2011.*
3.3.2 Aquatic Resources 3.3.2.2 Environmental Effects Effects of Ramping Rates on Aquatic Biota	Page 111 Paragraph 2 Line 1	Alternative 1 includes the ramping rates specified in Forest Service condition no. 24. Alternative 1 is similar to PCWA's proposal for ramping, except for an additional clause indicating that during the first two events when down ramp of spill flows occur at Hell Hole and French Meadow reservoirs, PCWA would test its ability to manage spill flow to provide the specified ramping rates.	Alternative 1 includes the ramping rates specified in Forest Service condition no. 24. Alternative 1 is similar to PCWA's proposal for ramping, except for two elements: (1) it does not include the 900 cfs upper limit on Oxbow powerhouse releases; and (2) it includes an additional clause indicating that during the first two events when down ramp of spill flows occur at Hell Hole and French Meadow reservoirs, PCWA would test its ability to manage spill flow to provide the specified ramping rates.	**Important Omission.** The 900 cfs upper limit on Oxbow powerhouse in the Proposed Action was "removed" in Alternative 1 and the USDA-FS Preliminary Terms and Conditions (Condition No. 22) so that the 1,000 cfs whitewater boating targets could be met. Alternative 1 and the USDA-FS Preliminary Terms and Conditions include higher minimum flows to reduce flow fluctuations in the peaking reach and eliminate the need for the 900 cfs cap. *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 22 – Minimum Streamflows, August 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C2, PCWA Alternative Condition No. 22 – Minimum Streamflows, Page 11, September 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C4, PCWA Alternative Condition No. 24 – Ramping Rates, Pages 23-24, September 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C8, PCWA Alternative Condition No. 39 – Recreation Streamflows in the Middle Fork American River below Oxbow Powerhouse, September 2011.*
3.3.2 Aquatic Resources 3.3.2.2 Environmental Effects Effects of Ramping Rates on Aquatic Biota *Our Analysis*	Page 112 Paragraph 1 Line 7	Ramping rates for the Middle Fork American River below Hell Hole dam and French Meadows dam would result in an additional 9 years (in the 33- year period of record) where spills are down ramped when they would not have been under existing conditions.	Ramping rates for the Middle Fork American River below Hell Hole dam and French Meadows dam would result in an additional ~~9~~10 or 11 years, respectively, (in the 33- year period of record) where spills are down ramped when they would not have been under existing conditions.	**Clarification.** Supplemental Table 3.7-4a identifies the correct number of days that spills would occur (with a spill magnitude of at least equal to or greater than the magnitude of the flow required to initiate motion of 25% of the gravel substrate). Lower magnitude spills occurred during the period of record that did not equal or exceed this threshold. *Reference: PCWA, Supplemental Filing, Page 3.8-9 to 3.7-10, Table 3.7-4a, November 2011.*

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3.3.2 Aquatic Resources 3.3.2.2. Environmental Effects Effects of Ramping Rates on Aquatic Biota *Our Analysis*	Page 112 Paragraph 4 Line 1	We recognize that achieving the specified downramping rates at French Meadows and Hell Hole dam would likely entail some experimentation with operating infrastructure that controls releases from the dam, especially where that infrastructure is new. Providing for a test period, as specified in Alternative 1, would enable operational protocols to be developed based on experience. It would also serve to identify those spills that would controllable by PCWA. However, we note that if ramping rates should vary from what may be specified in a new license, PCWA would also need to report any such variances to the Commission with documentation of the circumstances that resulted in the variance. It would be up to Commission staff to determine whether or not the variance represented a violation of the conditions of a license. If a change in ramping rates is recommended by PCWA following the results of the initial testing, we would expect the testing reports to be provided to the Commission to support any such change.	We recognize that achieving the specified downramping rates at French Meadows and Hell Hole dam would likely entail some experimentation with operating infrastructure that controls releases from the dam, especially where that infrastructure is new. Providing for a test period, as specified in Alternative 1, would enable operational protocols to be developed based on experience. It would also serve to identify those spills that would controllable by PCWA. ~~However, we note that if ramping rates should vary from what may be specified in a new license,~~ Any deviations from the ramping rates specified will not be considered violations during the first two spill management events but will be reported to the FS, CDFG, the State Water Board, and Commission within 30 days of the occurrence. At the conclusion of each of the first two spill events, the Licensee will submit a testing report to the FS, CDFG, and State Water Board. After the second spill event, the Licensee may recommend modifications to the down ramp of the spill flow schedule(s), if needed, and consultation with FS, CDFG, and State Water Board. Following FS, CDFG, and State Water Board approval, the Licensee will submit the recommended modification of down ramp spill flow schedule(s) to the Commission. Once FERC has approved the flow schedule with any suggested modification, as appropriate, PCWA would need to comply with the FERC approved schedule. PCWA would also need to report any ~~such~~ variances to the Commission with documentation of the circumstances that resulted in the variance. It would be up to Commission staff to determine whether or not the variance represented a violation of the conditions of a license. ~~If a change in ramping rates is recommended by PCWA following the results of the initial testing, we would expect the testing reports to be provided to the Commission to support any such change.~~	**Clarification.** PCWA's recommended revisions are consistent with the compliance criteria specified in PCWA's Alternative Filing, Attachment C4 – Condition No. 24, Pages 21-22 and is the same as the USDA-FS Preliminary Terms and Conditions, Condition No. 24. The recommended changes clarify that PCWA will be testing their ability to provide the specified ramping rates during the first two spill events and deviations from the schedule will not be considered compliance violations. *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, August 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C4, PCWA Alternative Condition No. 24 – Ramping Rates, Pages 21-22, September 2011.*
3.3.2 Aquatic Resources 3.3.2.2 Environmental Effects Fish Entrainment	Page 122 Paragraph 5 Line 5	The screens would have 1-mm-diameter openings.	The screens would have ~~1-mm-diameter~~ openings that are consistent with CDFG and other agency requirements to protect entrainment of fish (current CDFG screen spacing requirements are 1.75 mm for reaches where steelhead fry are present or 2.38 mm for reaches without steelhead fry).	**Updated Information.** Screen slot spacing will be designed, at a minimum, to comply with CDFG requirements (currently these requirements are 1.75 mm for reaches with steelhead present or 2.38 mm where steelhead fry are not present) and any other agency requirements that are applicable. The 1 mm spacing was a preliminary design that likely will be modified during final design in concurrence with the applicable agencies. *References: California Department of Fish and Game, Fisheries Engineering Projects and Information, Fish Screen Criteria, http://www.dfg.ca.gov/fish/Resources/Projects/Engin/Engin_ScreenCriteria.asp* *National Marine Fisheries Service, Southwest Region, Fish Screening Criteria for Anadromous Salmonids, January 1997.*
3.3.2 Aquatic Resources 3.3.2.3 Cumulative Effects Central Valley Steelhead	Page 129 Paragraph 4 Line 3	Since Nimbus and Folsom dams were constructed, two new barriers to upstream fish passage have developed in the peaking reach downstream of the project—"Tunnel Chute" at RM 22.9, which was created by mining activity in the 1880s and "Ruck-a-Chucky rapids" at RM 10.8, created by a landslide in the 1940s.	~~Since Nimbus and Folsom dams were constructed,~~ Two ~~new~~ large, non-Project barriers to upstream fish passage ~~have developed~~ exist in the peaking reach downstream of the project—"Tunnel Chute" at RM 22.9, which was created by mining activity in the 1880s and "Ruck-a-Chucky rapids" at RM 10~~.8~~.7, created by a landslide in the 1940s. These barriers pre-date the construction of Nimbus and Folsom Dams.	**Clarification.** PCWA's recommended revisions clarify that these barriers were present prior to the creation of Nimbus Dam (1955) and Folsom Dam (1955). PCWA has also recommended revising the river mile location of Ruck-a-Chucky rapids to be consistent with PCWA's AQ 6 – Passage Barrier Technical Study Report. *Reference: PCWA, Final License Application, Supporting Document B, AQ 6 – Fish Passage Technical Study Report, February 2011.*
3.3.3 Terrestrial Resources 3.3.3.1 Affected Environment Special-Status Plants	Page 136 Table 3.3.3-2 Row 1 Column 5	**Species Name**: Stebbins' phacelia (*Phacelia stebbinsii*) **Occurrence Notes**: Forty-nine populations (112 acres) were documented within the study area around project facilities including: • 44 populations in the vicinity of Hell Hole Reservoir (about 2.4 to 4.7 million individuals)…	**Species Name**: Stebbins' phacelia (*Phacelia stebbinsii*) **Occurrence Notes**: ~~Forty-nine~~ Sixty-three populations (~~112~~ 115 acres) were documented within the study area around project facilities including: • ~~44~~ 58 populations in the vicinity of Hell Hole Reservoir (about ~~2.4~~ 2.5 to ~~4.7~~ 5.0 million individuals)…	**Updated Information.** Table 7.6-2 of the Application for New License was updated in the Supplemental Filing (Table 3.6-1) to include additional Stebbins' phacelia populations documented around Hell Hole Reservoir during supplemental botanical surveys conducted in 2011. *Reference: PCWA, Supplemental Filing, Table 3.6-1, Page 3.6-1, November 2011.*
3.3.3 Terrestrial Resources 3.3.3.1 Affected Environment Riparian Vegetation	Page 140 Table 3.3.3-4 Rows 2, 3, 11 Columns 3, 4	**Large Reservoirs** Hell Hole reservoir Total Miles of Vegetated Shoreline: 9.1 Total Miles of Shoreline: 11 French Meadows reservoir Total Miles of Vegetated Shoreline: 8.5 Total Miles of Shoreline: 9 **Total** Total Miles of Vegetated Shoreline: 19.7 Total Miles of Shoreline: ~26	**Large Reservoirs** Hell Hole Reservoir Total Miles of Riparian Vegetated Shoreline: ~~9.1~~ 2.3 Total Miles of Shoreline: ~~11~~ 13 French Meadows Reservoir Total Miles of Riparian Vegetated Shoreline: ~~8.5~~ 0.6 Total Miles of Shoreline: ~~9~~ 10 **Total** Total Miles of Riparian Vegetated Shoreline: ~~19.7~~ 5 Total Miles of Shoreline: ~~26~~ ~30	**Updated Information.** Table 3.3.3-4 is based on information provided in PCWA's Final License Application Table 7.8-1. *Reference: Final License Application, Supporting Document B, AQ-10 Riparian Resources Technical Study Report, February 2011.*

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3.3.3 Terrestrial Resources 3.3.3.1 Affected Environment Wildlife	Page 143 Paragraph 2 Line 5	Eight osprey nests were identified during osprey nest relicensing surveys. This includes six active nests identified during osprey surveys in the study area–three nests at French Meadows reservoir and three nests at Hell Hole reservoir. In addition, numerous incidental osprey observations were recorded during implementation of other technical studies, and two additional active osprey nests were observed at French Meadows reservoir.	~~Eight~~ Ten osprey nests were identified during ~~osprey nest relicensing surveys~~ the review of existing information and osprey nest surveys conducted for the relicensing. This includes six active nests identified during osprey surveys in the study area–three nests at French Meadows reservoir and three nests at Hell Hole reservoir. In addition, numerous incidental osprey observations were recorded during implementation of other technical studies, and ~~two~~ four additional active osprey nests were observed at French Meadows reservoir.	**Updated Information.** The total number of osprey nests reported in the Supplemental Biological Technical Study Report – 2011 is ten, including six nests identified during relicensing surveys and four additional nests documented as incidental observations. *Reference: PCWA, Supplemental Filing, Attachment 2A, Supplemental Biological Technical Study Report – 2011, Map 6, November 2011.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Vegetation *Noxious Weed Management*	Page 163 Paragraph 2 Line 9	This two-phased approach is omitted from the Alternative 1 plan, and all areas would be treated equally if noxious weeds are found within the project boundary.	This two-phased approach is omitted from the Alternative 1 plan, and ~~all areas would be treated equally if noxious weeds are found within the project boundary~~ specific treatment of noxious weed populations identified within the project boundary would be developed during annual consultation with USDA-FS.	**Clarification.** The VIPMP included in PCWA's Supplemental Filing requires consultation with USDA-FS to develop specific treatment of noxious weed populations within the Project boundaries. The USDA-FS approved the VIPMP in a letter dated January 12, 2012. *References: PCWA, Supplemental Filing, Attachment 1A, Vegetation and Integrated Pest Management Plan, Section 3.2.1, Page 6, November 2011.* *USDA-FS. 2012. Letter from Kathryn Hardy, Forest Supervisor, Eldorado National Forest to Kimberly Bose, Secretary, Federal Energy Regulatory Commission, regarding three management plans developed for the Middle Fork American River Project (FERC No. 2079). January 12, 2012.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Vegetation *Protection of Riparian Vegetation along Bypassed and Peaking Reaches*	Page 167 Paragraph 3 Line 7	Forest Service 4(e) and California Fish and Game 10(j) recommendation 28 specify that the plan needs to be finalized and submitted for approval to the Forest Service.	Forest Service 4(e) and California Fish and Game 10(j) recommendation 28 specify that the plan needs to be finalized and submitted for approval to the Forest Service, CDFG, and State Water Board.	**Typographical Error.** *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 28 – Monitoring Program, August 2011.* *CDFG, Response to Ready for Environmental Analysis Federal Power Act Section 10(j) and 10(a) RECOMMENDATIONS Middle Fork American River Project (FERC Project No. 2079-069), August 2011.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Vegetation *Effects of Proposed Changes in Hell Hole Reservoir Operations on Vegetation*	Page 169 Paragraph 5 Line 4	In Area 2a, the overall frequency of inundation during the growing season for Stebbins' phacelia for all water year types combined would increase from 11 (existing conditions) to 14 years (proposed operation) over the period of record (33 years modeled). This increase in inundation frequency would occur in above normal and below normal water years. The average duration of inundation (average days per year) would increase under the proposed action by 8 days in wet years, by 9 days in above normal years, and by 8 days in below normal years. Similar to existing conditions, Area 2a would not be inundated in dry or critical water years under the proposed action.	In Area 2a, the overall frequency of inundation during the growing season for Stebbins' phacelia for all water year types combined would increase from 11 (existing conditions) to ~~14~~ 13 years (proposed operation) over the period of record (33 years modeled). This increase in inundation frequency would occur in above normal and below normal water years. The average duration of inundation (average days per year) would increase under the proposed action by ~~8~~ 6 days in wet years, by ~~9~~ 21days in above normal years, and by ~~8~~ 7 days in below normal years. Similar to existing conditions, Area 2a would not be inundated in dry or critical water years under the proposed action.	**Updated Information.** Updated data are provided in PCWA's Supplemental Filing. *Reference: PCWA, Supplemental Filing, Section 3.6.1.3, Page 3.6-9, November 2011.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Vegetation *Our Analysis*	Page 170 Table 3.3.3-6 Row 2 Columns 4 and 5	**Area**: Area 2a **Area (acres)**: 2.47 **No**. **Individuals**: 54,000-108,000	**Area**: Area 2a **Area (acres)**: ~~2.47~~ 2.0 **No**. **Individuals**: ~~54,000- 108,000~~ 53,000-106,000	**Updated Information.** Updated data are provided in PCWA's Supplemental Filing. *Reference: PCWA, Supplemental Filing, Table 3.6-3, Page 3.6-9, November 2011.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Vegetation *Our Analysis*	Page 170 Table 3.3.3-6 Row 3 Columns 2 and 3	**Area**: Area 2b **Area (acres)**: 4.55 **No**. **Individuals**: 99,000-198,000	**Area**: Area 2b **Area (acres)**: ~~4.55~~ 5.0 **No**. **Individuals**: ~~99,000- 198,000~~ 117,000-234,000	**Updated Information.** The Area 2b data cited in the DEIS are outdated. Updated data are provided in the Supplemental Filing. *Reference: PCWA, Supplemental Filing, Table 3.6-3, Page 3.6-10, November 2011.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Vegetation *Effects of Proposed Changes in Hell Hole Reservoir Operations on Vegetation*	Page 171 Paragraph 1 Line 12	The duration of inundation in Area 2a would increase by from 8 to 9 days in wet, above average, and below average water years, and in Area 2b by 22 days in wet and 15 days in above average water years compared with existing conditions.	The duration of inundation for Alternative 1 in Area 2a would increase by ~~from 8 to 9 days~~ 6 days in wet, 21 days in above ~~average~~ normal, and 7 days in below ~~average~~ normal water years, and in Area 2b by 22 days in wet and 15 days in above ~~average~~ normal water years compared with existing conditions.	**Updated Information.** The average duration of inundation under existing and future demand and existing conditions is provided in Table 3.6-4 in PCWA's Supplemental Filing. *References: PCWA, Supplemental Filing, Page 3.6-13, Table 3.6-4, November 2011.* *PCWA, Final License Application, Section 7.5.3.2, Page 7.3-5, February 2011.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Vegetation *Effects of Proposed Changes in Project Facilities on Vegetation*	Page 171 Paragraph 2 Line 2	In addition, the PCWA proposed and Alternative 1 Recreation Plans both call for the removal of two campsites at Hell Hole Campground, and all 13 campsites at the Upper Hell Hole Campground.	In addition, the PCWA proposed and Alternative 1 Recreation Plans both call for the removal of ~~two campsites at Hell Hole Campground, and all 13 campsites at the Upper Hell Hole Campground~~ all 13 campsites at the Upper Hell Hole Campground. And while PCWA's proposed Recreation plan calls for removal of two campsites at Hell Hole Campground, the Alternative 1 Recreation Plan proposes to remove either 3 sites or convert Hell Hole Campground to a group camp area.	**Clarification.** *Reference: PCWA, Recreation Plan (July 2011), Page 10; included as attachment to USDA-FS Preliminary Section 4(e) Terms and Conditions (filed with FERC on August 5, 2011).*

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3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Vegetation *Our Analysis*	Page 172 Paragraph 2	PCWA's proposed reduction in the recreation area at Hell Hole Vista that would undergo vegetation management and maintenance would reduce the project-related effects on this population by about 80 percent, removing about 38,300–76,600 individual Stebbins' phacelia plants from potential project-related effects. This would represent a substantial protective measure for this special status species population compared to existing conditions. The Alternative 1 VIPMP does not specify surveys for a portion of the French Meadows Campground Water Supply Facility Access Road that was not included in PCWA's special-status plant surveys conducted for the relicensing of the project, but that could be affected by project activities. Routine maintenance along this road could potentially affect special-status plants, if present, and surveys in this area would address any potential effects from project activities.	PCWA's proposed reduction in the recreation area at Hell Hole Vista that would undergo vegetation management and maintenance would reduce the project-related effects on this population by about 80 percent, removing about 38,300–76,600 individual Stebbins' phacelia plants from potential project-related effects. This would represent a substantial protective measure for this special status species population compared to existing conditions. ~~The Alternative 1 VIPMP does not specify surveys for a portion of the French Meadows Campground Water Supply Facility Access Road that was not included in PCWA's special-status plant surveys conducted for the relicensing of the project, but that could be affected by project activities. Routine maintenance along this road could potentially affect special-status plants, if present, and surveys in this area would address any potential effects from project activities.~~	**Updated Information.** Special-status plant surveys were conducted on the French Meadows Campground Water Supply Access Road during supplemental botanical surveys conducted in June and July 2011. Results of these surveys were provided in PCWA's Supplemental Filing. In addition, PCWA has committed to conduct special-status plant surveys every five years at all MFP facilities identified in Table 5.1 of the Alternative 1 Vegetation and Integrated Pest Management Plan, including the French Meadows Campground Water Supply Facility Access Road. *References: PCWA, Supplemental Filing, Attachment 2A, Supplemental Biological Technical Study Report – 2011, Map 6, November 2011.* *PCWA, Supplemental Filing, Attachment 1A, Vegetation and Integrated Pest Management Plan, Table 1, November 2011.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Wildlife *Protection of Newly Designated Special Status Plants and Wildlife*	Page 182 Paragraph 3 Line 7	Special status plant and raptor nest and winter roost surveys would be conducted at 5 year intervals, which would include any newly designated special status plants and raptors.	Special status plant ~~and raptor nest and winter roost~~ surveys would be conducted at 5 year intervals, which would include any newly designated special status plants. ~~and raptors.~~	**Clarification.** Raptor surveys will be conducted prior to implementation of ground disturbing activities during the raptor nesting season (February 15-September 15). Newly designated raptors nests would be identified during these surveys. *Reference: PCWA, Supplemental Filing, Appendix A – Modified or New Facility Construction Activities and Concept Designs, Table A-2, November 2011.*
3.3.3 Terrestrial Resources 3.3.3.2 Environmental Effects Riparian Wildlife	Page 184 Paragraph 3 Line 1	Under the proposed action, modification of existing and new facility construction includes permanent loss of riparian habitat at the following locations: Duncan Creek diversion dam modification (0.03 acre), a new water supply at French Meadow North (0.02 acre), South Fork Long Canyon Creek diversion dam modification (0.01 acre), a new stream gage downstream of South Fork Long Canyon Creek diversion dam (0.03 acre), Hell Hole dam outlet works modification (0.24 acre), and a new stream gage downstream of the Middle Fork interbay dam (0.01 acre).	Under the proposed action, modification of existing and new facility construction includes permanent loss of riparian habitat at the following locations: Duncan Creek diversion dam modification (0.03 acre), a new water supply at French Meadow North (0.02 acre), South Fork Long Canyon Creek diversion dam modification (~~0.01~~ 0.03 acre), a new stream gage downstream of South Fork Long Canyon Creek diversion dam (~~0.03~~ 0.01 acre), Hell Hole dam outlet works modification (0.24 acre), and a new stream gage downstream of the Middle Fork interbay dam (0.01 acre).	**Typographical Error.** *Reference: PCWA, Supplemental Filing, Section 3.6.3.3, Page 3.6-22, November 2011.*
3.3.3 Terrestrial Resources 3.3.4.2 Environmental Effects Valley Elderberry Longhorn Beetle *Our Analysis*	Page 191 Paragraph 5	Because the project area is unlikely to support elderberry plants, the valley elderberry longhorn beetle is unlikely to be present at or affected by the project. If elderberry plants are identified in the project, further coordination with FWS to identify further minimization measures (e.g., pre-activity survey, buffers) would be most protective for the valley elderberry longhorn beetle.	Because the project area is unlikely to support elderberry plants, the valley elderberry longhorn beetle is unlikely to be present at or affected by the project. If elderberry plants are identified in the project below 3,000 foot elevation and could be adversely affected by Project operation and maintenance activities, further coordination with FWS to identify further minimization measures (e.g., pre-activity survey, buffers) would be most protective for the valley elderberry longhorn beetle.	**Clarification.** Consultation with USFWS should only be required if the MFP could potentially result in adverse effects to valley elderberry longhorn beetle or their habitat (defined by USFWS as elderberry shrubs below 3,000 foot-elevation). *Reference: US Fish and Wildlife Service. 1999. Conservation Guidelines for the Valley Elderberry Longhorn Beetle. Sacramento, CA.*
3.3.5 Recreation and Land Use 3.3.5.1 Affected Environment Recreation *Project Area Recreation Resources*	Page 200 Paragraph 1 Line 4	Except for group campgrounds, visitor use and capacity data indicates the recreation facilities at French Meadows and Hell Hole reservoirs are underutilized on weekdays, weekends, and holidays. By comparison, the remaining recreation facilities are not underutilized and experience occupancy rates ranging from as low as 7 percent on weekdays to 75 percent on weekends.	Except for group campgrounds, visitor use and capacity data indicates all of the Project recreation facilities ~~at French Meadows and Hell Hole reservoirs~~ are underutilized on weekdays, weekends, and holidays. The group campgrounds experience occupancy rates ranging from 10% on weekdays to 75% on weekends. By comparison, the remaining recreation facilities are underutilized and experience occupancy rates ranging from as low as ~~7~~2 percent on weekdays to ~~75~~ 43 percent on weekends.	**Clarification.** The revisions more accurately characterize utilization rates at the Project recreation facilities. *Reference: PCWA, Final License Application, Table 7.9-3, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.1 Affected Environment Recreation *Recreation in River Reaches* Whitewater Recreation	Page 203 Table 3.3.5-2 Row 6 Column 4	**Reach**: Middle Fork interbay dam to Ralston afterbay **Optimum flow (cfs)**: 550-550	**Reach**: Middle Fork interbay dam to Ralston afterbay **Optimum flow (cfs)**: ~~550~~ 500-550	**Typographical Error.** *Reference: PCWA, Final License Application, Supporting Document B, REC 4 – Contingency Whitewater Boating Study Technical Study Report, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.1 Affected Environment Recreation *Recreation in River Reaches* Whitewater Recreation	Page 204 Table 3.3.5-3 Row 2 Column 2	**Reach**: Mammoth Bar and Murderer's Bar runs (Middle Fork American River from Ruck-a-Chucky recreation area to Murderer's Bar) **Class**: I-II	**Reach**: Mammoth Bar and Murderer's Bar runs (Middle Fork American River from Ruck-a-Chucky recreation area to Murderer's Bar) **Class**: ~~I – II~~ I-III	**Clarification.** The Mammoth Bar run is rated class I-II, and the Murderer's Bar run is rated class II-III. When combined, the overall class rating for both runs should be I-III. *Reference: PCWA, Final License Application, Supporting Document B, REC 4 – Stream-Based Recreation Opportunities Technical Study Report, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.1 Affected Environment Recreation *Recreation in River Reaches* Angling	Page 204 Paragraph 1 Line 6	The peaking reach is boated privately and commercially; however commercial boating accounts for the vast majority of use (17,110 out of 25,683 boaters in 2007.)	The peaking reach is boated privately and commercially; however commercial boating accounts for the vast majority of use (17,110 out of ~~25,683~~ 17,683 boaters in 2007.)	**Typographical Error.** *Reference: PCWA, Final License Application, Supporting Document B, REC 4 – Stream-Based Recreation Opportunities Technical Study Report, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.1 Affected Environment Recreation *Recreation in River Reaches* Angling	Page 205 Table 3.3.5-4 Row 3 Column 3	**Month**: Mar **Water Year Type**, **Above Normal**: 1.38	**Month**: Mar **Water Year Type**, **Above Normal**: ~~1.38~~ 13.8	**Typographical Error.** *Reference: PCWA, Final License Application, Supporting Document B, REC 4 – Stream-Based Recreation Opportunities, Table REC 4-27, February 2011.*

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DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects Recreation *Our Analysis* Minimum Pool Elevations	Page 224 Table 3.3.5-7 Row 4-6 Column 7	**Water Year Type**: Dry **Alternative 1 (WSE in feet)** **Sept-May**: 5,152[l] **Alternative 1 (WSE in feet)** **Sept-May**: 5,152[l] **Alternative 1 (WSE in feet)** **Sept-May**: 5,150[l]	**Water Year Type**: Dry **Alternative 1 (WSE in feet)** **Sept-May**: 5,152[~~l~~] **Alternative 1 (WSE in feet)** **Sept-May**: 5,152[~~l~~] **Alternative 1 (WSE in feet)** **Sept-May**: 5,150[~~l~~]	**Typographical Error.**
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects Boat Ramp Extensions	Page 226 Paragraph 3 Line 11	Similarly, the Alternative 1 Recreation Plan indicates it may not be feasible to extend the French Meadows ramp to the specified elevation of 5,175 feet.	~~Similarly, the Alternative 1 Recreation Plan indicates it may not be feasible to extend the French Meadows ramp to the specified elevation of 5,175 feet.~~	**Clarification.** PCWA Supplemental Filing does not state that the French Meadows boat ramp extension may not be feasible. Feasibility comments in the Supplemental Filing apply only to the Hell Hole boat ramp extension. *Reference: PCWA, Supplemental Filing, Section 3.9.3.2 – Boat Ramp Improvements, Pages 3.9-21, November 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects Recreation Boat Ramp Extensions *Our Analysis*	Page 227 Paragraph 2 Line 6	The ramps at French Meadows reservoir currently provide boating access to the reservoir throughout the peak recreation season in all but critical and extremely critical water year types when the ramps are generally functional until the beginning of September and mid-July, respectively. The ramps are currently functional through the extended recreation season only in wet, above normal, and below normal water year types. During critical and extreme water year types PCWA proposes and Forest Service condition no. 37 specifies minimum water surface elevation during the peak recreation season of 5,152 feet and 5,175 feet, respectively. If the French Meadows boat ramp were extended to an elevation of 5,175 feet, as proposed by PCWA and specified in the Forest Service condition no. 37 would provide additional reservoir boating during the peak recreation season in critical and extreme critical water year types. If the boat ramp were extended to 5,175 feet, the boat ramp would not be functional if PCWA's proposed minimum water surface elevation of 5,152 feet were implemented.	The ramps at French Meadows reservoir currently provide boating access to the reservoir throughout the peak recreation season in all but critical and extremely critical water year types when the ramps are generally functional until the beginning of September and mid-July, respectively. The ramps are currently functional through the extended recreation season only in wet, above normal, and below normal water year types. During critical and extreme water year types PCWA proposes and Forest Service condition no. 37 specifies minimum water surface elevation during the peak recreation season of ~~5,152~~ 5,157 ~~feet and 5,175 feet, respectively~~. If the French Meadows boat ramp were extended to an elevation of 5,175 feet, as ~~proposed by PCWA and~~ specified in the Forest Service condition no. 37 it would provide additional reservoir boating during the peak recreation season in critical and extreme critical water year types. If the boat ramp were extended to 5,175 feet, the boat ramp would not be functional if PCWA's proposed minimum water surface elevation of ~~5,152~~ 5,157 feet were implemented.	**Typographical Error.** *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 37 –Reservoir Minimum Pool Elevations and Reservoir Levels Recreation Objectives Condition, August 2011.* *PCWA, Final License Application, Supporting Document A – Aquatic Resources – Measures, Instream Flow and Reservoir Minimum Pool Measure, Page 11, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects Boat Ramp Extensions *Our Analysis*	Page 228 Paragraph 1 Line 1	The ramp at Hell Hole reservoir currently provides boating access to the reservoir throughout the peak recreation season in all water year types. In general, the ramps are currently functional through the extended recreation season, in wet, above normal and below normal and dry water year types.	The ramp at Hell Hole reservoir currently provides boating access to the reservoir throughout the peak and extended recreation season in ~~all~~wet, above normal, and below normal water year types. ~~In general, the ramps are currently functional through the extended recreation season, in wet, above normal and below normal and dry water year types.~~ In dry and critical dry water year types, the boat ramp is often only available for a portion of the recreation season. In extreme critical water year types, the boat ramp is generally not available.	**Clarification.** The corrected text more accurately represents the boat ramp conditions at Hell Hole Reservoir. *Reference: PCWA, Final License Application, Appendix C2c, Figures C2c-1 – C2c-6, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects *Whitewater Boating*	Page 237 Table 3.3.5-10 Row 5 Column 2	**Water year type**: Below normal **Flow (cfs)**: 900	**Water year type**: Below normal **Flow (cfs)**: ~~900~~ 1000	**Typographical Error.** *Reference: PCWA, Final License Application, Instream Flow and Reservoir Minimum Pool Measure, Page 10, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects *Whitewater Boating*	Page 237 Table 3.3.5-10 Footnote A	[a] As measured below the confluence of Middle and North Forks of the American River unless otherwise specified (USGS gage no. 11433300).	[a] ~~As measured below the confluence of Middle and North Forks of the American River unless otherwise specified (USGS gage no. 11433300).~~ Flow compliance measured at the Middle Fork American River near Foresthill USGS Gage (No. 11433300).	**Typographical Error.** *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 39 – Recreation Streamflows in the Middle Fork American River Below Oxbow Powerhouse, August 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects Recreation Recreational Programs *Whitewater Boating*	Page 238 Table 3.3.5-11 Row 9 Column 4	**Weekends** **Water Year Type**: Below Normal **Saturday before Memorial Day-Labor Day**: Saturdays except for Western States 100 date	**Weekends** **Water Year Type**: Below Normal **Saturday before Memorial Day-Labor Day**: Saturdays (except for Western States 100 ~~date~~ and Tevis Cup Race) and Sundays	**Clarification.** *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 39 – Recreation Streamflows in the Middle Fork American River below Oxbow Powerhouse, August 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects *Whitewater Boating*	Page 239 Table 3.3.5-11 Footnote A	[a] As measured below the confluence of Middle and North Forks of the American River (USGS gage no. 11433300).	[a] ~~As measured below the confluence of Middle and North Forks of the American River (USGS gage no. 11433300).~~ Flow compliance measured at the Middle Fork American River near Foresthill USGS Gage (No. 11433300).	**Typographical Error.** *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 39 – Recreation Streamflows in the Middle Fork American River Below Oxbow Powerhouse, August 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects *Whitewater Boating* *Our Analysis*	Page 240 Paragraph 1 Line 8	PCWA's proposed instream flows for Long Canyon Creek would increase boating opportunities during wet water year types compared to existing conditions. Although PCWA's instream flows would result in fewer boating opportunities on this reach during below normal and above normal water years, it would maintain boating opportunities available during wet water years.	PCWA's proposed instream flows for Long Canyon Creek would increase boating opportunities during wet water year types compared to existing conditions. ~~Although PCWA's instream flows would result in fewer boating opportunities on this reach during below normal and above normal water years, it would maintain boating opportunities available during wet water years.~~	**Clarification.** The corrected text more accurately represents the boating opportunities in Long Canyon Creek. Under existing, proposed, and Alternative 1 conditions boating opportunities only exist in wet water year types. *Reference: PCWA, Final License Application, Figure 8.9-1b, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects *Whitewater Boating*	Page 240 Table 3.3.5-12 Footnote A	[a] As measured below the confluence of Middle and North Forks of the American River (USGS gage no. 11433300).	[a] ~~As measured below the confluence of Middle and North Forks of the American River (USGS gage no. 11433300).~~ Flow compliance measured at the Middle Fork American River near Foresthill USGS Gage (No. 11433300).	**Typographical Error.** *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 39 – Recreation Streamflows in the Middle Fork American River Below Oxbow Powerhouse, August 2011.*

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3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects *Whitewater Boating* *Our Analysis*	Page 241 Paragraph 1 Line 2	Boating opportunities between French Meadows dam and Middle Fork interbay are not currently available and would not be available in the drier years if the project were operated under PCWA's proposed instream flows because flows would exceed the suitable boating flow range during May and June due to the cumulative effect of pulse flows that would be released from French Meadows reservoir and Duncan Creek.	Boating opportunities between French Meadows dam and Middle Fork interbay are not currently available and would not be available in the drier years. ~~i~~If the project were operated under PCWA's proposed instream flows~~, because~~ flows would exceed the suitable boating flow range during May and June in above and below normal water year types due to the cumulative effect of pulse flows, spills, accretion, and/or increased minimum instream flows that would be released from French Meadows reservoir and Duncan Creek.	**Clarification.** The corrected text more accurately represents the boating opportunities between French Meadows dam and Middle Fork interbay. *Reference: PCWA, Final License Application, Figure 8.9-1c, February 2011.*
3.3.5 Recreation and Land Use 3.3.5.2 Environmental Effects Recreation Management Programs *Ramping* *Our Analysis*	Page 243 Paragraphs 2 and 3	*Ramping* PCWA's proposed ramping rates below Oxbow powerhouse are the same as what the agencies specify (see section 3.3.2, *Aquatic Resources,* table 3.3.2-10). *Our Analysis* PCWA's proposed ramping rates would represent a large reduction in the ramping rate of Oxbow powerhouse flow releases (50 percent reduction of upramping rate and 41 percent reduction of the downramping rate) and, during the driest water year types (dry, critical, extreme critical), a 900 cfs maximum limit on the Oxbow powerhouse releases from Memorial Day weekend to Labor Day. Reducing the ramping rate from Oxbow powerhouse would enhance recreation in the peaking reach by allowing recreationists to have more time to adjust their activities to changing flows. PCWA's proposed ramping rates in this reach would provide better conditions for angling compared to what currently exists.	*Ramping* PCWA's proposed ramping rates below Oxbow powerhouse are generally the same as what the agencies and Alternative 1 specify except the agencies and Alternative 1 ramping rate conditions do not include the 900 cfs maximum flow release limit on Oxbow powerhouse. The 900 cfs limit would preclude the ability to provide the 1,000 cfs target whitewater boating flows in the reach (see section 3.3.2, Aquatic Resources, table 3.3.2-10) *Our Analysis* PCWA's proposed ramping rates and the agency and Alternative 1 ramping rates would represent a large reduction in the ramping rate of Oxbow powerhouse flow releases (50 percent reduction of upramping rate and 41 percent reduction of the downramping rate) ~~and, during the driest water year types (dry, critical, extreme critical), a 900 cfs maximum limit on the Oxbow powerhouse releases from Memorial Day weekend to Labor Day~~. Reducing the ramping rate from Oxbow powerhouse would enhance recreation in the peaking reach by allowing recreationists to have more time to adjust their activities to changing flows. PCWA's proposed ramping rates in this reach would provide better conditions for angling compared to what currently exists.	**Important Omission.** The 900 cfs upper limit on Oxbow powerhouse in the Proposed Action was "removed" in Alternative 1 and the USDA-FS Preliminary Terms and Conditions (Condition No. 22) so that the 1,000 cfs whitewater boating targets could be met. Alternative 1 and the USDA-FS Preliminary Terms and Conditions include higher minimum flows to reduce flow fluctuations in the peaking reach and eliminate the need for the 900 cfs cap. *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 22 – Minimum Streamflows, August 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C2, PCWA Alternative Condition No. 22 – Minimum Streamflows, Page 11, September 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C4, PCWA Alternative Condition No. 24 – Ramping Rates, Pages 23-24, September 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C8, PCWA Alternative Condition No. 39 – Recreation Streamflows in the Middle Fork American River below Oxbow Powerhouse, September 2011.*
3.3.6 Cultural Resources 3.3.6.1 Affected Environment Identified Resources *Archaeological and Historic-Era Resources*	Page 252 Paragraph 1 Line 17	In November 2011, PCWA identified five more resources within the APE (FS-05-03-372, FS-05-03-55-684, FS-05-03-55-689, FS-05-03-55-690, and FS-05-17-54-495) bringing the total site count to 37 properties (PCWA, 2011d).	In November 2011, PCWA identified five more resources within the APE (FS-05-03-53-372, FS-05-03-55-684, FS-05-03-55-689, FS-05-03-55-690, and FS-05-17-54-495) bringing the total site count to 37 properties (PCWA, 2011d).	**Typographical Error.** *Reference: PCWA, Final Historic Properties Management Plan, Table 1, September 2012.*
3.3.6 Cultural Resources 3.3.6.1 Affected Environment Identified Resources *Archaeological and Historic-Era Resources*	Page 252 Paragraph 3 Line 3	Two of these resources (FS-05-03-55-64 and FS-05-03-65) had been previously determined to be eligible for listing on the National Register by the Forest Service, and a third site (FS-05-17-54-370) had been determined ineligible.	Two of these resources (FS-05-03-~~55~~53-64 and FS-05-03-53-65) had been previously determined to be eligible for listing on the National Register by the Forest Service, and a third site (FS-05-17-54-370) had been determined ineligible.	**Typographical Error.** *Reference: PCWA, Final Historic Properties Management Plan, Table 1, September 2012.*
3.3.6 Cultural Resources 3.3.6.1 Affected Environment Identified Resources *Archaeological and Historic-Era Resources*	Page 252 Paragraph 3 Line 10	In June 2010, the California SHPO concurred with all of these recommendations except for one (letter from M.W. Donaldson, California SHPO, California Department of Parks and Recreation, Sacramento, CA, to A. Fecko, Resource Planning Administrator, PCWA, June 22, 2010).	In June 2010, the California SHPO concurred with all of these recommendations ~~except for one~~ (letter from M.W. Donaldson, California SHPO, California Department of Parks and Recreation, Sacramento, CA, to A. Fecko, Resource Planning Administrator, PCWA, June 22, 2010).	**Clarification.** SHPO concurred with all of PCWA's findings. *Reference: Letter from M.W. Donaldson, California SHPO, California Department of Parks and Recreation, Sacramento, CA, to A. Fecko, Resource Planning Administrator, PCWA, June 22, 2010*
3.3.6 Cultural Resources 3.3.6.1 Affected Environment Identified Resources *Archaeological and Historic-Era Resources*	Page 260 Paragraph 3 Line 4	In its HPMP, PCWA also stated that two other resources (FS-05-03-55-690 and ISO-06) were determined to be within the boundaries of FS-05-03-55-20, which is eligible for listing.	In its HPMP, PCWA also stated that two other resources (FS-05-03-55-690 and ISO-06) were determined to be within the boundaries of FS-05-03-55-201, which is eligible for listing.	**Typographical Error.** *Reference: PCWA, Final Historic Properties Management Plan, Table 1, September 2012.*
3.3.6 Cultural Resources 3.3.6.2 Environmental Effects Project-Related Effects on Cultural Resources *Our Analysis*	Page 265 Paragraph 2 Line 1	In its Alternative 1 HPMP, PCWA recommends that two sites (FS-04-17-54-372 and FS-05-17-54-478) are not eligible for listing on the National Register;	In its Alternative 1 HPMP, PCWA recommends that two sites (FS-~~04-17-54-~~05-03-53-372 and FS-05-17-54-478) are not eligible for listing on the National Register;	**Typographical Error.** *Reference: PCWA, Final Historic Properties Management Plan, Table 1, September 2012.*

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3.3.6 Cultural Resources 3.3.6.2 Environmental Effects Project-Related Effects on Cultural Resources *Our Analysis*	Page 265 Paragraph 2 Line 1	In its Alternative 1 HPMP, PCWA recommends that two sites (FS-04-17-54-372 and FS-05-17-54-478) are not eligible for listing on the National Register; however, no documentation of California SHPO concurrence, and in the case of FS-04-17-54-372, consultation with BLM, regarding these recommendations is provided. Receipt of California SHPO concurrence would ensure compliance with section 106 and would ensure that these two sites are treated appropriately. Further, FS-05-17-54-478 is listed twice in table 1 of the Alternative 1 HPMP: once as a water conveyance ditch that has been recommended as ineligible for listing on the National Register and a second time as an unevaluated mining ditch. We assume that the identification of the site as unevaluated is incorrect, but clarification in the HPMP would ensure document accuracy.	In its Alternative 1 HPMP, PCWA recommends that two sites (FS-04-17-54-372 and FS-05-17-54-478) are not eligible for listing on the National Register; however, no documentation of California SHPO concurrence, and in the case of FS-04-17-54-372, consultation with BLM, regarding these recommendations is provided. Receipt of California SHPO concurrence would ensure compliance with section 106 and would ensure that these two sites are treated appropriately. ~~Further, FS-05-17-54-478 is listed twice in table 1 of the Alternative 1 HPMP: once as a water conveyance ditch that has been recommended as ineligible for listing on the National Register and a second time as an unevaluated mining ditch. We assume that the identification of the site as unevaluated is incorrect, but clarification in the HPMP would ensure document accuracy.~~	**Clarification.** Sites FS-04-17-54-372 and FS-05-17-54-478 were evaluated for potential inclusion on the National Register of Historic Places (NRHP) after the Area of Potential Effects (APE) was expanded. The evaluation results are documented in a NRHP Report for Site FS-05-03-53-372 and FS-05-17-54-478, which was included in Volume 3 of PCWA's Supplemental Filing (PCWA 2011b). The study results indicate that neither of these resources are eligible for inclusion on the NRHP. The report has not yet been sent to SHPO for concurrence, because the ownership of the land under Site FS-05-03-53-372 was in question. This site was previously thought to be located on land managed by the Bureau of Land Management (BLM). Therefore, a copy of the NRHP Report for Site FS-05-03-53-372 and FS-05-17-54-478 was provided to the BLM for review on August 28, 2012. However, on September 20, 2012, the BLM indicated that the land underlying Site FS-05-03-372 is owned by the USDA-FS. Therefore, the BLM does not have jurisdiction and declined to comment on the report. A copy of the NRHP Eligibility Report will be sent the SHPO for review along with a letter requesting concurrence with the study recommendations. Copies of all correspondence with the BLM and with SHPO will be provided to the FERC. Site FS-05-17-54-478 is a water conveyance ditch. PCWA completed an NRHP-evaluation of this ditch in 2011 and the evaluation results are documented in the report identified above. The Final HPMP was revised to include this background information. In addition, Table 1 of the Final HPMP was corrected to show Site FS-05-17-54-478 as an evaluated water conveyance/mining ditch, and to exclude the erroneous reference to the ditch as unevaluated. *Reference: PCWA, Final Historic Properties Management Plan, Pages 10 and Table 1, September 2012.*
3.3.7 Aesthetic Resources 3.3.7.1 Affected Environment	Page 266 Paragraph 4 Line 10	Based on EVC ratings range from I (ecological changes only), to V (landscape changes are strong and obvious) most facilities have an EVC of II (changes are not visually evident unless pointed out) to III (changes are noticed but do not attract attention and appear as minor disturbances) and a few facilities have EVCs of I and IV (changes may attract some attention but disturbances resemble natural patterns).	Based on EVC ratings range from I (ecological changes only), to V (landscape changes are strong and obvious) most facilities have an EVC of II (changes are not visually evident unless pointed out) to III (changes are noticed but do not attract attention and appear as minor disturbances) and a few facilities have EVCs of ~~I and~~ IV (changes may attract some attention but disturbances resemble natural patterns).	**Typographical Error.**
SECTION 4.0 DEVELOPMENTAL ANALYSIS				
4.0 Developmental Analysis	Page 275 Table 4-2 Row 3 Column 3	Annual generation (MWh) **PCWA's Proposal**: 994,444 MWh	Annual generation (MWh) **PCWA's Proposal**: ~~994,444~~ 991,384 MWh	**Typographical Error.** *Reference: PCWA, Final License Application, Table 11-5, February 2011.*
4.1 Power and Economic Benefits of the Project 4.2.2 PCWA's Proposal	Page 276 Paragraph 1 Line 1	Under PCWA's proposal, the project would generate an average of 994,444 MWh of electricity annually.	Under PCWA's proposal, the project would generate an average of ~~994,444~~ 991,384 MWh of electricity annually.	**Typographical Error.** *Reference: PCWA, Final License Application, Table 11-5, February 2011.*
SECTION 5.0 CONCLUSIONS AND RECOMMENDATIONS				
5.1 Comparison of Alternatives	Page 305 Paragraph 2 Line 2	We estimate the annual generation of the project under the four alternatives identified above. Our analysis shows that the annual generation would be 994,444 MWh for the proposed action; 985,877 MWh for the staff alternative and Alternative 1; and 1,039,078 MWh for the no-action alternative.	We estimate the annual generation of the project under the four alternatives identified above. Our analysis shows that the annual generation would be ~~994,444~~ 991,384 MWh for the proposed action; 985,877 MWh for the staff alternative and Alternative 1; and 1,039,078 MWh for the no-action alternative.	**Typographical Error.** *Reference: PCWA, Final License Application, Table 11-5, February 2011.*
5.1 Comparison of Alternatives	Page 306 Table 5-1 Row 1 Column 3	**Resource**: Generation **Proposed Action**: 994,444 MWh	**Resource**: Generation **Proposed Action**: ~~994,444~~ 991,384 MWh	**Typographical Error.** *Reference: PCWA, Final License Application, Table 11-5, February 2011.*
5.2 Comprehensive Development and Recommended Alternative	Page 312 Paragraph 2 Line 4	We recommend this option because: (1) issuance of a new hydropower license by the Commission would allow PCWA to operate the project as an economically beneficial and dependable source of electrical energy for its customers;	We recommend this option because: (1) issuance of a new hydropower license by the Commission would allow PCWA to operate the project as an economically beneficial and dependable source of electrical energy for the ~~its customers~~ California electrical grid;	**Clarification.** PCWA is an independent generator (wholesaler of electricity) that sells electricity to California's electrical retailers. *Reference: PCWA, Final License Application, Section 2.2, Page 2-2 and 2-3, February 2011.*
5.2 Comprehensive Development and Recommended Alternative 5.2.1 Measures Proposed by PCWA	Page 313 Paragraph 1 Bullet 4	• Implement the proposed ramping rates downstream of French Meadows, Hell Hole, and Ralston afterbay reservoirs, and after the first two downramping events at French Meadows and Hell Hole dams, provide a report to the agencies and Commission documenting PCWA's ability to manage spill flows to provide the specified ramping rates and, if appropriate, make recommendations for any ramping rate modifications.	• Implement the proposed ramping rates downstream of French Meadows, Hell Hole, and Ralston afterbay reservoirs. During the first two spill events when down ramp of spill flows occur at Hell Hole and French Meadows reservoirs, the Licensee will test their ability to manage spill flows to provide the specified flow schedules. After the first two downramping events at French Meadows and Hell Hole dams, PCWA will provide a testing report to the agencies and Commission documenting PCWA's ability to manage spill flows. After the second spill event, the Licensee may recommend modifications to ~~provide the specified~~ ramping rates. ~~and, if appropriate, make recommendations for ramping rate modifications.~~	**Clarification.** PCWA's recommended revisions are consistent with the ramping rate testing program specified in PCWA's Alternative Filing, Attachment C4 – Condition No. 24, Pages 21-22 and is consistent with the USDA-FS Preliminary Terms and Conditions, Condition No. 24. The recommended changes clarify that PCWA will be testing their ability to provide the specified ramping rates during the first two spill events. *Reference: PCWA, Submittal of Alternative Conditions, Attachment C4, PCWA Alternative Condition No. 24 – Ramping Rates, Pages 21-22, September 2011.*

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DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement Alternative 1 Instream Minimum Flows	Page 319 Table 5-2 Row 1 Columns 3-14	**Location**: Duncan Creek below Duncan diversion dam **Water Year Type**: E/C	**Location**: Duncan Creek below Duncan diversion dam **Water Year Type**: E/C (add grey shading to row)	**Clarification.** Enclosure 1 and Attachment C of PCWA's Supplemental Filing both specify 'or natural inflow' for minimum instream flows in Duncan Creek below the Duncan Creek Diversion Dam in all water year types. *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 22 – Minimum Streamflows, Page 16, August 2011.*
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement Alternative 1 Instream Minimum Flows	Page 320 Table 5-2 Row 3 Columns 11-14	**Location:** American River below Middle Fork interbay dam **Water Year Type**: AN May 1-14: 45 May 15-31: 45 June 1-14: 26 June 15-30: 26	**Location**: American River below Middle Fork interbay dam **Water Year Type**: AN May 1-14: ~~45~~65 May 15-31: ~~45~~65 June 1-14: ~~26~~45 June 15-30: ~~26~~45	**Clarification.** FERC's DEIS reflects the minimum instream flows recommended by the USDA-FS in their preliminary 4(e) conditions *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 22 – Minimum Streamflows, Page 17, August 2011.*
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement Alternative 1 Instream Minimum Flows	Page 323 Paragraph 2 Line 1	Our recommended and PCWA's proposed minimum flow regimes are designed to provide temperatures that support hardhead spawning in lower project stream reaches (which typically occurs at higher water temperatures than trout).	Our recommended and PCWA's proposed minimum flow regimes are designed to ~~provide~~ maintain suitable temperatures that support hardhead ~~spawning~~ in lower project stream reaches (~~which typically occurs at~~ hardhead require warmer ~~higher~~ water temperatures than trout).	**Clarification.** *References: PCWA, Final License Application, Section 8.5.9.1, Special-Status Species, Hardhead, Pages 8.5-30 and 31, February 2011.* *PCWA, Supplemental Filing, Section 3.5.9.1, Special-Status Species, Hardhead, Pages 3.5-29 and 30, November 2011.*

PCWA's Recommended Revisions to FERC's Draft Environmental Impact Statement.

DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement the Alternative 1 Peaking Reach Minimum Flows during Planned and Unplanned Powerhouse Outages	Page 324 Paragraph 2 Line 1	Our recommended outage minimum flows make no provisions for modifying the peaking reach minimum flows specified in table 5-3 during planned outages. When unplanned outages at Middle Fork and Ralston powerhouses simultaneously occur from May through September for periods of less than 2 weeks, our recommended peaking reach minimum flow, consistent with Forest Service condition no. 25, would be as follows: • If the Ralston afterbay water surface elevation is greater than 1,161 feet at the time of the outage, the minimum flow release would be 200 cfs or the minimum flow specified in table 5-2, whichever is less, until the elevation reaches less than or equal to 1,161 feet. • If the Ralston afterbay water surface elevation is less than or equal to 1,161feet any time during the outage, the minimum flow release would be the October minimum flow specified in table 5-2. When just Ralston powerhouse experiences an unplanned outage from June through September for up to a 2-week period, water would be released from the Middle Fork powerhouse and bypassed reach downstream of Middle Fork interbay to ensure compliance with the peaking reach minimum flows specified in table 5-3. Minimum flows that would protect aquatic habitat during project operations would be similarly protective during planned and unplanned outages, and our recommended approach to maintaining minimum flows in the peaking reach during unplanned outages provides this level of assurance while allowing for some reductions during outages that occur between July through September to accommodate limitations of the project during a period when trout fry would have emerged from the gravel and become relatively mobile.	Our recommended outage minimum flows make no provisions for modifying the peaking reach minimum flows specified in table 5-~~3~~32 during planned outages. When unplanned outages at Middle Fork and Ralston powerhouses simultaneously occur from May through September for periods of less than 2 weeks, our recommended peaking reach minimum flow, consistent with Forest Service condition no. 25, would be as follows: • If the Ralston afterbay water surface elevation is greater than 1,161 feet at the time of the outage, the minimum flow release would be 200 cfs or the minimum flow specified in table 5-2, whichever is less, until the elevation reaches less than or equal to 1,161 feet. • If the Ralston afterbay water surface elevation is less than or equal to 1,161feet any time during the outage, the minimum flow release would be the October minimum flow specified in table 5-2. When just Ralston powerhouse experiences an unplanned outage from June through September for up to a 2-week period, water would be released from the Middle Fork powerhouse and bypassed reach downstream of Middle Fork interbay to ensure compliance with the peaking reach minimum flows specified in table 5-3. It may be necessary to release additional water from Hell Hole Reservoir into the Rubicon River and from French Meadow Reservoir/Middle Fork Interbay into the MFAR to meet the minimum flow requirements in the peaking reach or downstream consumptive demands. In this case, release water will be split between the two rivers up to a maximum of 55 cfs release (60 cfs in Wet water years) in the Rubicon River and a maximum of 80 cfs in the MFAR below French Meadows Reservoir and below Interbay Reservoir. If these maximum flows of 80 cfs in the MFAR below Interbay Reservoir and 55 cfs (60 cfs in Wet water years) below Hell Hole Reservoir Dam are less than is necessary to meet the minimum streamflows described in the bulleted items above, the Licensee shall not release flows above these maximum flows except in the following circumstance: releases into the MFAR below Interbay Reservoir may exceed 80 cfs if necessary to meet consumptive demands and required minimum streamflows of 75 cfs at the American River Pump Station (75 cfs requirement pursuant to the Licensee's pump station mitigation requirement below American River Pump Station) upon commencement of FYLF monitoring and 24 hours advanced noticed to the FS, CDFG, and the State Water Board. If the unplanned outage extends beyond 2 weeks, minimum streamflows in the MFAR peaking reach during the remainder of the outage will be determined in consultation with FS, CDFG, and State Water Board. The flow release in the Rubicon River during the remainder of the outage will also be determined in consultation with FS, CDFG, and the State Water Board. Flow releases in the MFAR (from French Meadows Reservoir and/or the Middle Fork Powerhouse) will be determined by the Licensee in accordance with minimum streamflow requirements, water supply demands, and operational requirements (e.g., reservoir management, power generation). Minimum flows that would protect aquatic habitat during project operations would be similarly protective during planned and unplanned outages, and our recommended approach to maintaining minimum flows in the peaking reach during unplanned outages provides this level of assurance while allowing for some reductions during outages that occur between July through September to accommodate limitations of the project during a period when trout fry would have emerged from the gravel and become relatively mobile.	**Typographical Error.** **Important Omission.** FERC's staff recommendation does not include (or explain) important elements of the outage conditions developed in consultation with the resource agencies that ensure protection of FYLF (sensitive species) within the Rubicon River below Hell Hole Dam and Middle Fork American River below Middle Fork Interbay Dam. The outage condition also ensures protection of water supply. *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 25 – Outages, August 2011.* *PCWA, Submittal of Alternative Conditions, Attachment C5, PCWA Alternative Condition No. 25 – Outages, Pages 25, September 2011.*

PCWA's Recommended Revisions to FERC's Draft Environmental Impact Statement.

DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement Alternative 1 Pulse Flows	Page 325 Paragraph 2 Line 1	Alternative 1 and our recommended pulse flow measure specify a schedule of pulse flows for each bypassed reach based on water year type (table 5-4), downramping rates of pulse flows, compliance points, text periods, and reporting requirements.	Alternative 1 and our recommended pulse flow measure specify a schedule of pulse flows for each bypassed reach based on water year type (table 5-4), downramping rates of pulse flows, compliance points, ~~text~~ time periods, and reporting requirements.	**Typographical Error.**
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement Alternative 1 Pulse Flows	Page 327 Paragraph 2 Line 1	Our recommended pulse flow measure specifies that during wet years, pulse flows would begin on May 15 instead of on May 1 (PCWA's proposal). This later initiation of pulse flows would provide more time for rainbow trout fry to emerge from the gravel prior to a planned high flow event, thus offering further protection to incubating eggs.	Our recommended pulse flow measure specifies that during wet years, pulse flows would begin on May 15 instead of on May 1 (PCWA's proposal). This later initiation of pulse flows would occur prior to FYLF breeding and will protect FYLF populations. The pulse flows will occur prior to rainbow trout fry emergence in the bypass reaches (similar to natural conditions). Further, the magnitude of the pulse flows is designed to minimize deep scouring of gravels, therefore redds should be protected. ~~provide more time for rainbow trout fry to emerge from the gravel prior to a planned high flow event, thus offering further protection to incubating eggs.~~	**Clarification.** As stated discussed in Section 3.5, page 3.5-20 in PCWA's Supplemental Filing, the pulse flows are timed to start prior to FYLF breeding initiation'. In addition, as discussed in Section 3.5, page 3.5-17, the Alternative 1 pulse flows 'were designed to initiate motion of gravels (clean fines from gravels), but not excessively remove gravel substrates from the system.' Rainbow trout emergence from gravels in the bypass reaches occurs after initiation of the pulse flows (typically early to late June). However, pulse flows are designed to minimize deep scouring of gravels. *References: PCWA, Final License Application, Supporting Document B, AQ 2 – Fish Populations Technical Study Report, February 2011. (Section 6.7.1, pg 23)* *PCWA, Supplemental Filing, Section 3.5.9.2, Special-Status Species, Foothill Yellow-legged Frog, Pages 3.5-29 and 30, November 2011.* *PCWA, Supplemental Filing, Section 3.5.3.3, Bypass Reach Habitat, Rainbow Trout Spawning, Scour, Pages 3.5-17, November 2011.*
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement the Alternative 1 Whitewater Boating Flows in the Peaking Reach	Page 329 Table 5-5 Row 1 Column 4	**June 1-Labor Day**	~~**June 1-Labor Day**~~ **Saturday before Memorial Day-Labor Day**	**Clarification.** *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 39 – Recreation Streamflows in the Middle Fork American River Below Oxbow Powerhouse, Page 45, August 2011.*
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement the Alternative 1 Whitewater Boating Flows in the Peaking Reach	Page 329 Table 5-5 Row 5 Column 4	**Weekends** **Water Year Type**: Below normal **Saturday before Memorial Day-Labor Day:** Saturdays except for Western States 100 date	**Weekends** **Water Year Type**: Below normal **Saturday before Memorial Day-Labor Day**: Saturdays (except for Western States 100 date and Tevis Cup Race Days) and Sundays	**Clarification.** *References: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 39 – Recreation Streamflows in the Middle Fork American River Below Oxbow Powerhouse, Page 45, August 2011.*
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement Alternative 1 Whitewater Boating Flows in the Peaking Reach	Page 329 Table 5-5 Footnote A	[a] As measured below the confluence of Middle and North Forks of the American River (USGS gage no. 11433300).	[a] ~~As measured below the confluence of Middle and North Forks of the American River (USGS gage no. 11433300).~~ Flow compliance measured at the Middle Fork American River near Foresthill USGS Gage (No. 11433300).	**Typographical Error.** *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 39 – Recreation Streamflows in the Middle Fork American River Below Oxbow Powerhouse, August 2011.*
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Implement Alternative 1 Whitewater Boating Flows in the Peaking Reach	Page 330 Table 5-6 Footnote A	[a] As measured below the confluence of Middle and North Forks of the American River (USGS gage no. 11433300).	[a] ~~As measured below the confluence of Middle and North Forks of the American River (USGS gage no. 11433300).~~ Flow compliance measured at the Middle Fork American River near Foresthill USGS Gage (No. 11433300).	**Typographical Error.** *Reference: USDA-FS, Preliminary Section 4(e) Terms and Conditions, Enclosure 1, Condition No. 39 – Recreation Streamflows in the Middle Fork American River Below Oxbow Powerhouse, August 2011.*
5.2 Comprehensive Development and Recommended Alternative 5.2.2 Additional Measures Recommended by Staff Expanded Special Status Plant Survey Area	Page 336 Paragraph 2	Both the proposed and Alternative 1 VIPMPs provide for surveys at 5-year intervals for special status plants and mosses consistent with the methods in the special-status plants technical study report (PCWA, 2008a). However, the area surveyed during the pre-application special status plant surveys did not include a portion of the French Meadows Campground water supply facility access road. Routine maintenance along this road could potentially affect special-status plants, if present, and surveys in this area would address any potential effects from project activities. Therefore, we recommend that the VIPMP included in a new license include special status plant surveys at 5-year intervals along the entire French Meadows Campground water supply access road. The benefits of ensuring the same level of protection for special status plants that may occur there as other areas included in the geographic scope of the proposed and Alternative 1 VIPMP during the term of a new license is worth the estimated levelized annual cost of $1,260.	Both the proposed and Alternative 1 VIPMPs provide for surveys at 5-year intervals for special status plants and mosses consistent with the methods in the special-status plants technical study report (PCWA, 2008a). ~~However, the area surveyed during the pre-application special status plant surveys did not include a portion of the French Meadows Campground water supply facility access road. Routine maintenance along this road could potentially affect special-status plants, if present, and surveys in this area would address any potential effects from project activities. Therefore, we recommend that the VIPMP included in a new license include special status plant surveys at 5-year intervals along the entire French Meadows Campground water supply access road. The benefits of ensuring the same level of protection for special status plants that may occur there as other areas included in the geographic scope of the proposed and Alternative 1 VIPMP during the term of a new license is worth the estimated levelized annual cost of $1,260.~~	**Updated Information.** Special-status plant surveys were conducted on the French Meadows Campground Water Supply Access Road during supplemental botanical surveys conducted in June and July 2011. Results of these surveys were provided in PCWA's Supplemental Filing. In addition, PCWA has committed to conduct special-status plant surveys every five years at all MFP facilities identified in Table 5.1 of the Alternative 1 Vegetation and Integrated Pest Management Plan, including the French Meadows Campground Water Supply Facility Access Road. *Reference: PCWA, Supplemental Filing, Attachment 2A, Supplemental Biological Technical Study Report – 2011, Map 6, November 2011.* *Reference: PCWA, Supplemental Filing, Attachment 1A, Vegetation and Integrated Pest Management Plan, Table 1, November 2011.*

PCWA's Recommended Revisions to FERC's Draft Environmental Impact Statement.

DEIS SECTION	DEIS REFERENCE	DEIS STATEMENT	PCWA'S RECOMMENDED REVISIONS	PCWA'S RATIONALE
5.2.2 Additional Measures Recommended by Staff Revised Historic Properties Management Plan	Page 340 Paragraph 1 Line 4	These effects would include those associated with reservoir drawdown for operation and maintenance purposes (i.e., FS-05-03-55-684 and FS- FS-05-03-55-689), recreation activities, including trail maintenance and alignment (PL-03 and PL-19), and road construction (FS-05-03-55-495) and documentation of California State Historic Preservation Office (California SHPO) concurrence with all National Register recommendations;	These effects would include those associated with recreation and/or reservoir drawdown for operation and maintenance purposes (i.e., FS-05-03-55-684 and FS- FS-05-03-55-689); ~~recreation activities , including~~ trail maintenance ~~and alignment~~ (~~PL-03 and~~ PL-19); gage maintenance (PL-03); and road ~~construction~~ maintenance/ trail upgrades ~~(FS-05-03-55-495)~~ (FS-05-17-54-495) and documentation of California State Historic Preservation Office (California SHPO) concurrence with all National Register recommendations;	**Clarification.** The DEIS incorrectly refers to Site FS-05-17-54-495 as FS-05-03-55-495. Site FS-05-17-54-495 is a historic mining ditch located near a project diversion. This ditch crosses a project road and trail. The ditch could potentially be affected by maintenance of a gage. PL-03 is a historic mining site located on private property (not owned by PCWA) outside of the FERC Project boundary. This resource could potentially be affected by maintenance of the Middle Fork American River Gage near Foresthill (USGS Gage 114333000). *Reference: PCWA, Final Historic Properties Management Plan, Pages 29-30 and Table 1, September 2012.*
5.2.3 Measures Not Recommended by Staff Recreation	Page 343 Paragraph 2 Line 1	We do not recommend the project include any development at Cache Creek as specific in Forest Service condition no. 35, at an estimated levelized annual cost of $7,500, because recreation use is related to dispersed camping and gold panning.	We do not recommend the project include any development at Cache ~~Creek~~ Rock as specific in Forest Service condition no. 35, at an estimated levelized annual cost of $7,500, because recreation use is related to dispersed camping and gold panning.	**Typographical Error.**

Attachment 1

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Attachment 2

Certificate of Service

CERTIFICATE OF SERVICE

Pursuant to the provisions of 18 C.F.R. § 385.2010, I hereby certify that I have this day served the foregoing document to the Federal Energy Regulatory Commission (FERC), each person designated on the official service list compiled by the Secretary, and other stakeholders to the relicensing proceedings for Project No. 2079, as set forth in the attached distribution list, by eFiling and eService (upon receipt of FERC's Acceptance for Filing email). For those parties unable to receive emails, one paper copy and one electronic copy of the foregoing documents were provided via courier service. In addition, I have mailed via courier service, one courtesy copy of this document to FERC's Office of Energy Projects and one courtesy copy to FERC's Office of General Counsel-Energy Projects.

Dated at Auburn, CA this 1st day of October 2012.

Andrew Fecko
Resource Planning Administrator
Placer County Water Agency