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Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

April 11, 2008

**SUBJECT: Comments on Pre-Application Document and Scoping Document I
Middle Fork American River Project, FERC No. 2079**

Dear Ms. Bose:

This letter represents the comments of the USDA Forest Service and the California Department of Fish and Game on Placer County Water Agency's (PCWA's) release of the Pre-Application Document (PAD) and the Federal Energy Regulatory Commission's (FERC's) Scoping Document I for the Middle Fork American River (MFAR) Project, FERC No. 2079.

First, we would like to commend PCWA for making the effort to engage in an early, collaborative integrated licensing process to relicense the MFAR Project. Their accommodating and straightforward approach to resolving issues has been of immense benefit in the relicensing process, as evidenced by the complete package of study plans, agreed to in collaboration with the participants, which is included with the PAD. We appreciate their efforts.

The PAD is a well-written, thorough document, and our comments are not expansive. Our comments follow.

Supporting Document A, Relicensing Process Plan

The project operations model should include a baseline simulation that represents recent historic operations applied to the unimpaired hydrologic record. The baseline simulation should include the current level of consumptive use demands.

Supporting Document B, Project Description

Page 9 under 2.6.1. The flow and temperature gages installed in various locations through out the project to gather data for the relicensing effort are not described. These gages are under a Special Use Authorization with the Forest Service.

Page 10. Please describe what the poles are made of (e.g. wood, metal) that the powerlines and communication lines are mounted on since the area is prone to wildfires and pole maintenance requirements are different depending on the material.



Page 10 as well as Table SD-B-1, SD-B-8. There is a fence around the French Meadows Dam generator building located on the north side of LL Anderson Dam at French Meadows Reservoir.

Table SD-B-7. The Dolly Creek water supply is a 20,000 gallon water storage tank that services the following: Coyote and Gates Group campgrounds, Lewis campground, McGuire Boat Ramp and Picnic areas, and the Forest Service Administrative site. The French Meadows Campground Water Supply is an 1,800-foot-long underground pipeline. Maintenance access from the 96-77 native surface road is an approximately 2,500 foot-long trail off of Forest Road 96.

Pages 23, 25, 26. The PAD should include information on the current level of consumptive use deliveries satisfied by the MFAR Project. It would be very helpful to provide a table of monthly consumptive demands for at least the past 5 years.

Supporting Document F, Section 7, Botanical and Wildlife Resources

Map 7-2. Remove "Eldorado NF Plant data (polygon)" from map and leave only the point data for the Eldorado National Forest and California Natural Diversity Database plant data. This will necessitate revisions to the existing resources narrative. Stebbin's phacelia should be Stebbins' phacelia (placement of apostrophe). Parry's horklia should be Parry's horkelia under ENF point data.

Page 7-2, under 7.1.2. Update USDA-FS Regional Forester's List of Sensitive Plant and Animal Species for Region 5 (USDA-FS 1998) to the current list that was revised in 2006.

Page 7-2, under 7.1.2. The reference for the Eldorado National Forest Land and Resource Management Plan is 1989.

Page 7-6, under 7.3.2. Pleasant Valley mariposa lily does not occur where stated and does not occur within watershed. Use only point data from Map 7-2.

Page 7-6, under 7.3.2. Yellow bur navarretia does not occur where stated and does not occur within watershed. Use only point data from Map 7-2.

Page 7-6, under 7.3.2. Stebbins' phacelia occurs within the watershed, but the reported population at the Middle Fork-Ralston Tunnel may be based on survey data and not actual occurrence. Use only point data from Map 7-2.

Page 7-6, under 7.3.2. The Forest Service has provided PCWA's consultant with revised numbers of plants known to be located with FERC Project boundary and numbers with potential to occur within the FERC Project boundary. These numbers should be included in this section. The numbers are based on combined information from the Eldorado National Forest, Tahoe National Forest, and California Natural Diversity Database listings. The number of potential plants would drop from 48 to 47 by removing Stebbins' lomatium (no longer on the Sensitive Plant List for the Eldorado National Forest. Pleasant Valley mariposa lily and yellow bur navarretia do not occur within the watershed, they can stay on the list since there is potential habitat.

Table 7-1. Revise based on (1) revised species habitat information for Appendix 7-B (see below and (2) revised occurrence records in Map 7-2. There are no occurrences of LOST, CACLA, or NAPRL in the watershed. Revise occurrence narrative for PHST6 depending on whether it is FERC Project boundary.

Page 7-7, under 7.3.2. Revise existing resources narrative to make consistent with changes to Map 7-2.

Page 7-7, under 7.3.3 and Table 7-2. *Ailanthus altissima* and *Bromus tectorum* are known to occur within the watershed. Change *Torilis nodosa* to *Torilis arvensis*.

Appendix 7-B: additional location information or revisions for ENF species. Correct in Table 7-1 also.

- CACLA – in openings, often south-facing slopes and ridgetops
- NAPRL – not primarily on south-facing exposures; often on lava caps or other openings, rocky ridgelines, saddles, and eroding ephemeral drainages; elevations from 2,300 to 5,000 feet.
- PHST6 – not meadows and seeps, riparian woodland; dry, open, rocky areas (bedrock outcrops, rubble or talus) on ledges and moderate or steep slopes
- ALTR2 – lower elevation ~3,400 ft – see CNPS on-line inventory
- ARNI – open, rocky ridges; acidic slate and shale soils, found in almost pure colonies on hard shale substrate primarily where other shrubs and trees don't grow;
- BASAM – vernal moist meadows also; substrates include sandstone, serpentine, or basalt outcrops.
- BOLU – per CNPS on-line inventory, elevation 2280 – 3400 m (~ 7,500 – 11,000 feet).
- BOMI – Correct name – *B. manganense*; also in meadows and seeps.
- BOMO – not necessarily old-growth forest; lower & upper montane coniferous forest, meadows and seeps; up to 7,000 feet in elevation.
- *Bruchia bolanderi* – also fens
- CYMO2 – in moist areas as well as dry, shaded slopes with northerly aspects; loamy soils
- EPHO3 – fens
- *Helodium blandowii* – fens
- HOPA2 – stony, disturbed, slightly acidic soils (on ENF)
- *Peltigera hydrothyria* – Correct spelling of specific epithet.
- LEKEH – Hutchinson should be Hutchison; *hutchinsonii* should be *hutchisonii*; volcanic soils.
- LEKEK – granitic and volcanic balds; down to 5,000 feet in elevation
- LESE3 – 2,800 – 4,800 feet; steep, nearly vertical cliffs, inner gorges
- *Meesia triquetra* – up to ~9,700 feet in elevation
- *Meesia uliginosa* – fens
- PALA41 – also rocky, gabbroic soils (for Table 1 – need to add serpentine, or ultramafic soils)
- Sources: Hickman, 1993, not Jepson, 1993; spelling Calflora

Supporting Document F, Section 10. Recreation Resources

Page 10-2. The Rubicon River is eligible, suitable, and has been recommended for:

- Scenic classification from Hell Hole Dam to Ellicotts Bridge (general locations).
- Wild classification from Ellicotts Bridge to Oxbow Reservoir (general locations).

The outstandingly remarkable value for which the Rubicon River is eligible is fisheries.

Page 10-2. PCWA should work with the Forest Service to accurately describe the existing condition as it relates to Wild and Scenic Rivers.

Pages 10-5 and 10-6 under 10.3.3. The Western States Trail is not a designated National Recreation Trail, although it is proposed for this designation, as stated under National Trails System on page 10-5 and as stated on page 10-6 under Western States Trail.

Page 10-8. While none of the MFAR Project facilities are located within designated Wilderness, the Granite Chief Wilderness is accessed by the same roads that PCWA uses to access the MFAR Project facilities and the public uses to access project recreation facilities. Specific roads are:

- From Foresthill: Mosquito Ridge Road (Forest Road (FR) 96) across LL Anderson Dam at French Meadows Reservoir, past Ahart Campground and Talbot Campground. The wilderness access is through the MFAR at Talbot Campground to the Picyune Trailhead. The other access is the Chipmunk Ridge Road (FR 48) to the Greyhorse Road (FR 48-14).
- From Georgetown, access is via roads used by the MFAR Project to access Hell Hole Reservoir and Middle Meadows Campground, up to the intersection of FR 25 and FR 22.

Beginning on page 10-12, also several tables (for example 10-1, 10-2, SD B-6). The Forest Service Recreation Developed facilities design capacity is 5 PAOT, not 6.

Page 10-12. Parking is available at Poppy Campground at the Trailhead directly north of the McGuire Boat Ramp Parking area. There are both vault and flush toilets with potable water at this location. Poppy Campground is located approximately 0.5 miles east of the trail generally referred to as the McGuire Trail and is identified by the Forest Service as route 16E10. This trail is also part of the Western States trail but is not currently used for any Western States Trail events. Vault toilets are available at the campground. The single units can accommodate 5 PAOT, giving the campground an overall capacity of 60 overnight visitors.

Page 10-17. There is a native surface ramp into the MFAR known as a cartop boat ramp at the Ralston Afterbay Picnic Area.

Page 10-17. Indian Bar has a native surface boat ramp. The rafting uses are managed by the California Department of Parks and Recreation, Auburn State Recreation Area (ASRA) even though the use is located on National Forest land managed by the Forest Service. Opposite the

boat put-in, just downstream of the Ralston Afterbay gates, is a unique-to-the-area sandy beach that the general public uses for a variety of recreational activities connected with water such as angling, swimming, and occasionally mining even though this area is inside of a mineral withdrawal for the Project.

Page 10-17. Recreation use is recorded at some of the developed Project campgrounds by concessionaires under contract with the Forest Service.

Tables, Recreation. The design PAOT is five on National Forest System lands associated with the project, not six as used to calculate the Maximum PAOT Capacity.

Supporting Document F, Section 11, Land Use

Page 11-3. The Eldorado and Tahoe Land and Resource Management Plans were amended by the Sierra Nevada Forest Plan Amendment in 2004.

Page 11-5. There is a gate barring access to the French Meadows Hell Hole Tunnel on the south side of French Meadows Reservoir.

Supporting Document G, 2005-2006 Hydrology Study Report

Page 27. We agree with the water year type classification proposed by PCWA.

Supporting Document H, Appendix A

We propose that the relationship between flow in the MFAR and flow entering the Horseshoe Bar area be characterized using one-dimensional hydraulic modeling, if possible. Horseshoe Bar is an oxbow bend in the MFAR that is bypassed during low to moderate flows by a tunnel (Tunnel Chute) constructed by miners in the late 1800s. The relationship between flow in the MFAR and Horseshoe Bar will be evaluated by adding one or more instream flow cross-sections at the entrance to Horseshoe Bar and on the MFAR. These will be used to hydraulically estimate the flow versus stage relationship in the MFAR and the corresponding stage versus flow relationship in Horseshoe Bar.

If a long duration high flow event occurs during the spring of 2008 or the winter/spring of 2008-2009 that is large enough to cause flow to enter Horseshoe Bar, and a crew can be mobilized, the water surface elevations at the cross-sections will be surveyed (if the survey can be accomplished safely) to calibrate the hydraulic model. If the flow cannot be safely surveyed, the water surface elevations will be visually estimated and an appropriate Manning's n value will be used in the hydraulics model to estimate the flow relationship between the MFAR and Horseshoe Bar.

Goals and Objectives: There are bullfrogs in this area that may be consuming young western pond turtles, a Forest Service sensitive species, and possibly California red-legged frogs, a threatened species, as well as other native aquatic species. The purpose of the hydraulic characterization would be to provide information useful for assessing the restoration potential of aquatic habitat in the Horseshoe Bar area. This would be accomplished by determining what

flow would be necessary in the MFAR to create flow into the Horseshoe Bar area that could be used to reduce the bullfrog population and improve aquatic habitat for native species by raising the water table.

Relevant Resource Agency Management Goals and Objectives: Objectives from the Sierra Nevada Forest Plan Amendment, which is an amendment to the Eldorado and Tahoe National Forest Land and Resource Management Plans, are as follows:

- Riparian Conservation Objective 101: Maintain and restore the timing, variability, and duration of floodplain inundation and water table elevation in wetlands and other special aquatic features.
- Riparian Conservation Objective 106: Secure instream flows needed to maintain, recover, and restore riparian resources, channel conditions, and aquatic habitat. Maintain in stream flows to protect aquatic systems to which species are uniquely adapted. Minimize effects of stream diversion or other flow modifications from hydroelectric projects on threatened, endangered, and sensitive species.

An objective of the USDA Forest Service Strategic Plan for Fiscal Years 2004-8, Goal 2 is: Reduce impacts from invasive species.

Existing Information: Bullfrogs have been observed residing in the ponds. Their 2-year life cycle to metamorphosis makes their tadpoles vulnerable from high winter flood flows. Western pond turtles have been sighted here in 2008. A large California red-legged frog population exists within 2 miles of the Horseshoe Bar ponds in the Michigan Bar area and an additional known frog sighting occurred within a mile of the area on Ralston Ridge. There is a likelihood that California red-legged frogs use or have used the Horseshoe Bar ponds, and have been or are being adversely affected by bullfrogs. California red-legged frogs metamorphose in the first year.

Project Nexus: There are currently low flows in the Horseshoe Bar area that may encourage bullfrog presence. Natural hydrograph flows in the Horseshoe Bar area would have likely controlled the populations of overwintering bullfrog tadpoles.

Accepted Scientific Methodology: Periodic spring pulse flows, simulating the natural hydrograph, are known to reduce bullfrog tadpoles when the flows are high enough to have a flushing effect (thus killing many of the tadpoles).

One-dimensional hydraulic modeling is a commonly accepted method of characterizing flow versus stage relationships in river channels.

Cost Effectiveness: The cost of characterizing the flow relationship in the MFAR versus the flow in Horseshoe Bar area (e.g., adding one or more transects and hydraulic modeling) is expected to be relatively small compared to the potential ecological benefits.

If you have questions, please contact Beth Paulson at 530-642-5174. Thank you.



RAMIRO VILLALVAZO
Forest Supervisor
Eldorado National Forest
USDA Forest Service



TOM QUINN
Forest Supervisor
Tahoe National Forest



Sandra Morey

SANDRA MOREY
Regional Manager
North Central Region
California Department of Fish and Game