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9.0 CUMULATIVE EFFECTS ANALYSIS

The regulations implementing the National Environmental Policy Act define a cumulative effect as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” (40 CFR § 1508.7). Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time, including hydropower development.

The Proposed Action is the issuance of a new license for the Middle Fork American River Project (MFP or Project), which includes modification and construction of MFP facilities, changes in routine operation and maintenance activities, and implementation of new environmental programs, measures, and facilities as described in Section 4.0 – Proposed Action. Implementation of the Proposed Action in conjunction with contributing effects of other past, present, and reasonably foreseeable future projects will benefit environmental (aquatic, terrestrial, and recreation), economic, and societal values in the vicinity of the MFP.

As shown on Map 9-1, other projects/actions considered in this cumulative effects analysis include:

- Sacramento Municipal Water District’s (SMUD) Upper American River Project (UARP) (FERC Project No. 2101) that influences flow into Hell Hole Reservoir and along the South Fork Rubicon River, a tributary to the Rubicon River entering downstream of Hell Hole Reservoir;
- El Dorado Water and Power Authority’s (EDWPA) water rights application to store water in SMUD’s UARP reservoirs;
- Georgetown Divide Public Utility District’s (GDPUD) Stumpy Meadows Project (non-FERC project), which affects flows in Pilot Creek, a tributary to the Rubicon River entering downstream of Hell Hole Reservoir;
- Foresthill Public Utility District’s (FPUD) Sugar Pine Dam Project, which diverts water from Shirrtail Creek (a tributary to the North Fork American River) to provide consumptive water to the community of Foresthill;
- Pacific Gas & Electric’s (PG&E) Drum-Spaulding Project (FERC No. 2310) that influences flow into the North Fork American River from the Towle Diversion on Canyon Creek and the Lake Valley Diversion on the North Fork of the North Fork American River;
- Operations and maintenance of recreational facilities in Auburn State Recreation Area (ASRA) by United States Bureau of Reclamation (USBR) in the Middle Fork American River and North Fork American River downstream of Oxbow Powerhouse (peaking reach);

- Placer County Water Agency's (PCWA) Pulp Mill Canal Diversion Dam Project that diverts water for consumptive use from Canyon Creek (a tributary to the North Fork American River). PCWA's water rights allow for the diversion of up to 40 cubic feet per second (cfs) from Canyon Creek;
- PCWA's operation of the American River Pump Station diverts water from the North Fork American River near the city of Auburn to provide up to 35,500 acre-feet (ac-ft) of consumptive water (under full build-out) from the MFP to meet PCWA's consumptive demand;
- United States Department of Agriculture-Forest Service (USDA-FS) Eldorado National Forest (ENF) maintains recreation facilities and provides for recreational opportunities on Forest Service lands in the vicinity of the MFP in accordance with the ENF Land and Resource Management Plan (LRMP) (USDA-FS 1988);
- USDA-FS Tahoe National Forest (TNF) maintains recreation facilities and provides for recreational opportunities on Forest Service lands in the vicinity of the MFP in accordance with the TNF LRMP (USDA-FS 1990); and
- Operations of Folsom Reservoir by the USBR to provide releases for downstream water uses and to protect aquatic resources in the Lower American River and the Delta.

9.1 TARGET RESOURCES

The target resources considered for inclusion in the cumulative impacts analysis were identified based on: a review of the technical information developed in support of this Draft Application for New License; comments received during formal scoping meetings; and discussions with resource agencies, Native American Tribes, local and regional authorities, non-governmental organizations, local communities and businesses, and members of the public.

For this analysis, target resources that may be affected cumulatively by the incremental actions of the MFP in combination with other past, present, and reasonably foreseeable future actions include: water use (hydrology); water quality (water temperature); aquatic resources (resident fish, native amphibians, and anadromous fish); recreation resources; and air quality.

9.1.1 Geographic Scope

The geographic scope for the cumulative impact analysis defines the physical limits or boundaries of the effects on target resources from implementation of the Proposed Action when considering effects from other projects/actions. The geographic scope appropriate for evaluating cumulative effects for the MFP is the North Fork American River from Folsom Reservoir upstream to the confluence of the Middle Fork American River and the Middle Fork American River, Rubicon River, and associated tributaries affected by the MFP (Map 9-1). The rationale for limiting the geographic scope of this

analysis to upstream of Folsom Reservoir is that Folsom Reservoir (independently operated by the USBR) has sufficient storage capacity (approximately 975,000 ac-ft) to control the timing and volume of discharge from Folsom Dam under the Proposed Project and No-Action Alternative. Therefore, any shifts in the timing or volume of flows downstream of Folsom Dam are considered to be under the management of the USBR, and not a consequence of the operation of the MFP. However, this analysis does include an evaluation of the effect of changes in MFP operations under the Proposed Action in combination with other projects/actions on the timing, volume, and temperature of flows into Folsom Reservoir.

9.1.2 Temporal Scope

The temporal scope for the cumulative impact analysis defines the length of time analyzed when evaluating resource effects of the Proposed Action in the context of past, present, and reasonably foreseeable future actions. Evaluations of past and future actions are limited by the amount of available information for each target resource and by information defining future projects and actions. Based on the anticipated term of the new license for the MFP, the temporal scope used for the analysis of reasonably foreseeable future actions is 50 years.

9.2 CUMULATIVE EFFECTS ON WATER RESOURCES

9.2.1 Water Use (Hydrology)

Other water projects/actions, in addition to the MFP, that affect hydrology in the North and Middle Fork American River watersheds include: SMUD's UARP; EDWPA's Water Rights Application; GDPUD's Stumpy Meadows Reservoir; FPUD's Sugar Pine Project; PG&E's Drum-Spaulding Project; PCWA's Pulp Mill Canal Diversion Dam Project; and PCWA's American River Pump Station Project. These projects have resulted or will result in modification to the timing and magnitude of natural flows in the bypass and peaking reaches associated with the MFP. Information on the hydrologic effects of operations of the MFP (that include the hydrology effects of these projects) is provided in Sections 7.3 – Water Use Affected Environment and 8.3 – Water Use Environmental Effects, and in PCWA's Pre-Application Document (PAD), SD F, Section 4.0 (PCWA 2007). A summary of these project effects is highlighted below.

PCWA's MFP operations as modified under the Proposed Action, affect flows in the bypass and peaking reaches and water surface elevation/storage in Project reservoirs. In addition, water delivery increases from the MFP (to meet future consumptive demand under full build-out) modifies operations and effects instream flows and reservoir elevations. These changes are evaluated using the MFP Operations Simulation Model (Model) (Section 8.1 – Analytical Approach for a description of the model runs). The Model incorporates both existing and future operations of the MFP and other water projects/actions in the Watershed as described in the following:

- SMUD's UARP historical operations will be altered by the issuance of a new FERC license. The No-Action Alternative and Proposed Action model runs

incorporate the revised flow measures for the UARP, as described in the 2007 Settlement Agreement between stakeholders and SMUD and FERC's Final Environmental Impact Statement (FEIS) for the UARP (FERC 2008).

- EDWPA's water rights application to store water for consumptive uses in SMUD's UARP reservoirs will not change SMUD's rate of diversion from the upper Rubicon River or South Fork Rubicon River. Therefore, modeling of UARP Settlement Agreement flows adequately describes the project's impact in the Watershed.
- GDPUD's Stumpy Meadows Reservoir Project historical diversions from Pilot Creek are included in the No-Action Alternative and Proposed Action model runs. Future Stumpy Meadows Project operations are not expected to differ from historic operations.
- FPU D's Sugar Pine Dam Project historical diversions are incorporated in model runs for both the No-Action Alternative and Proposed Action. Future Sugar Pine Dam Project operations are not expected to differ from historic operations.
- PG&E's Drum-Spaulling Project historical operations (under the existing FERC license conditions) are included in the No-Action Alternative and Proposed Action model runs. The Drum-Spaulling Project is currently undergoing FERC relicensing, however, it is unknown at this time, or to what extent, the existing license conditions will change.
- PCWA's Pulp Mill Canal Diversion Dam Project is included in the No-Action Alternative and Proposed Action model runs. Future operations of the diversion are not expected to differ from historic operations.
- PCWA's American River Pump Station Project operations are included in the No-Action Alternative (42,000 ac-ft existing demand), Proposed Action – Existing Demand model run, and the Proposed Action – Future Demand model run (120,000 ac-ft future demand).

Under the Proposed Action, new instream flow releases were developed in the bypass and peaking reaches to maintain and/or enhance fish and aquatic resources, geomorphic channel processes, riparian resources, and whitewater recreational opportunities (Instream Flow and Reservoir Minimum Pool Measure [IFRM] PCWA 2010a; SD A). These changes in MFP operations in combination with other projects/actions in the North and Middle Fork American River watersheds contribute to an incremental improvement in beneficial uses.

The timing and magnitude of average monthly flow entering Folsom Reservoir under the Proposed Action, in combination with other projects/actions, is similar to the No-Action Alternative (Figure 9-1). Figure 9-1 compares model runs of average monthly inflow into Folsom Reservoir in different water years under the No-Action Alternative and Proposed Action – Future Demand. Implementation of measures in the Proposed

Action in combination with other projects/actions in the Watershed will have a negligible effect on flows entering Folsom Reservoir.

9.2.2 Water Quality (Temperature)

Overall, operations of the MFP substantially reduce summer instream temperatures in the Rubicon River, Middle Fork American River, and North Fork American River compared to pre-project (unimpaired) conditions. Maps 7.5-3a and 7.5-3b illustrate August water temperature in these rivers prior to the construction of the MFP (unimpaired conditions) and under the Proposed Action.

Two projects, in addition to the MFP, have the potential to cumulatively affect water temperature in the Rubicon River. SMUD's UARP has the potential to affect temperature in the South Fork Rubicon River and, therefore, affect temperature in the Rubicon River below the confluence of the South Fork Rubicon River. GDPUD's Stumpy Meadows Project has the ability to affect temperature in Pilot Creek and, therefore, affect temperature in the Rubicon River below the confluence of Pilot Creek.

In developing new instream flow measures in the Proposed Action for the MFP, summer water temperatures in the Rubicon River, at several locations under the No-Action Alternative and the Proposed Action, were compared to evaluate potential cumulative impacts. PCWA considered the effects of the SMUD and GDPUD projects on flows and resulting water temperatures in the Rubicon River, with particular emphasis on rainbow trout, hardhead, and foothill yellow-legged frog (FYLF) habitat. PCWA's water temperature model was used to identify potential cumulative effects on these resources and the instream flows were modified such that those included in the Proposed Action maintain water temperatures relative to these species. Table 8.5-3b shows that during the drier water year types, when Project flows could have the largest effect on summer water temperature, the Proposed Action maintains water temperatures similar to existing conditions (AQ 4 – Water Temperature Modeling Technical Study Report [TSR] [AQ 4 – TSR], Addendum 1, [PCWA 2010b; SD B]).

In the North Fork American River, below the confluence of the Middle Fork American River, several projects/actions may affect water temperature into Folsom Reservoir. These include modified operation of the MFP under the Proposed Action, increases in water deliveries from the MFP to meet future demand, PCWA's Pulp Mill Diversion, PG&E's Drum Spaulding Project and operations of Sugar Pine Dam by FPUD. The water temperature model developed for the MFP in the North Fork American River incorporates accretion flows and current hydrologic and water temperature effects of other projects in the watershed.

Mean monthly water temperature into Folsom Reservoir under the Proposed Action, in combination with other projects/actions in the North and Middle Fork American River watersheds, are similar compared to the No-Action Alternative in wet years and slightly cooler in dry years (Figure 9-2). Figure 9-2 compares model runs of average monthly temperature into Folsom River in two different water year types (wet and dry) under the No-Action Alternative and Proposed Action – Future Demand. Results of the model

demonstrate that water temperatures into Folsom Reservoir are maintained or slightly enhanced (cooler) under the Proposed Action and remain substantially cooler than water temperatures under unimpaired conditions.

9.3 CUMULATIVE EFFECTS ON AQUATIC RESOURCES

9.3.1 Resident Fish and Native Amphibians

Resident fish (e.g., rainbow trout, hardhead) and FYLF distribution and abundance in the Rubicon River downstream of the confluence with the South Fork Rubicon River and downstream of Pilot Creek could be cumulatively affected by changes in instream flows considering the Proposed Action, SMUD's UARP, and GDPUD's Stumpy Meadows Project.

Instream flows included under the Proposed Action consider the effects of the UARP and Stumpy Meadows Projects on hydrology and are designed to maintain the current distribution of cold water fish and warmer water FYLF and hardhead in the Rubicon River. The distribution of water temperature in the Rubicon River will remain similar under the Proposed Action (Section 9.2.2), therefore, the distribution of fish and FYLF will remain the same under the Proposed Action as compared to baseline conditions (No-Action Alternative). There will be no cumulative effect of the Proposed Action on aquatic species distributions.

Under the Proposed Action, higher minimum instream flows in the Rubicon River are proposed in the winter and spring to enhance aquatic resources (including resident fish). Also, higher minimum instream flows are included in the wet and above normal years during the summer (years when water temperature modeling indicated that minimum flows would not alter temperature conditions due to high accretions). These instream flow recommendations for the MFP were developed and analyzed in Section 8.5 – Fish and Aquatic Resources Environmental Effects. The analysis included the incremental contribution of UARP higher instream flow releases in the South Fork Rubicon River and the effects of Stumpy Meadows Project on Pilot Creek. The analysis shows that fish habitat in the Rubicon River is maintained, and FYLF are maintained with implementation of the instream flows included under the Proposed Action. Overall, the cumulative effect of the Proposed Action, considering other projects/actions in the Watershed, maintains aquatic resources.

9.3.2 Anadromous Fish

The Sacramento – San Joaquin drainage, which includes the American River and tributaries that drain the west slope of the Sierra Nevada, historically contained the richest native fish fauna of the Sierra Nevada, with 22 taxa (Moyle et al. 1996). Fourteen of these native fishes (including four runs of Chinook salmon) historically may have occurred in the streams associated with the MFP. Table 9-1 lists these native fish, their potential to occur in the Middle Fork American River Watershed, and their current management status.

Three native anadromous species (winter steelhead, Pacific lamprey, and Chinook salmon) historically migrated into the Middle Fork American River Watershed. Both steelhead and Chinook salmon reportedly ascended the Middle Fork American River past the Rubicon River confluence, and the Rubicon River as far as the Pilot Creek confluence, which is approximately 5 miles upstream of the Middle Fork American River confluence (Yoshiyama, et al. 1996). There are no catadromous or other migratory species present. In addition, the Middle Fork American River Watershed does not include essential fish habitat as defined under the Magnuson-Stevens Fishery Conservation and Management Act.

Impassable dams on the lower American River, including Nimbus and Folsom dams (completed in 1955 and 1956, respectively) prevent anadromous fish passage into bypass and peaking reaches associated with the MFP. Therefore, anadromous fish are not affected upstream of Folsom Reservoir by operations of the MFP. Under the Proposed Action, the timing and magnitude of flows from the MFP into Folsom Reservoir are similar to the No-Action Alternative (Section 9.2.1). In addition, water temperature into Folsom Reservoir under the Proposed Action is similar to the No-Action Alternative (Section 9.2.2). Therefore, operation of the MFP under the Proposed Action, in combination with other past, present, and reasonably foreseeable projects will not affect anadromous fish populations.

9.4 CUMULATIVE EFFECTS ON RECREATION

The Proposed Action in combination with actions taken by ENF and TNF on Forest Service lands and USBR in ASRA cumulatively affect recreation resources in the Middle Fork American River and North Fork American River watersheds, as described in the following.

9.4.1 Eldorado and Tahoe National Forests

The Proposed Action in combination with actions taken by USDA-FS has the potential to affect recreation resources in the Middle Fork American River Watershed on Eldorado and Tahoe national forests. The Eldorado and Tahoe national forests include approximately 603,701 acres and 829,204 acres, respectively, of which the MFP occupies approximately 1,305 acres within the ENF and 1,742 acres within the TNF.

USDA-FS maintain recreation facilities and provides recreation opportunities on Eldorado and Tahoe national forests, in accordance with the ENF Land and Resource Management Plan (LRMP) (USDA-FS 1988) and the TNF LRMP (USDA-FS 1990).

Implementation of the Proposed Action as described in the Recreation Plan (PCWA 2010c; SD A) will enhance recreation opportunities in the Eldorado and Tahoe national forests, as summarized in the following:

- Increased recreational boating opportunities in the bypass and peaking reaches;
- Improved stream-based angling opportunities and experience;

- Greater access to Project reservoirs;
- Facilitates trip planning by providing publicly available real-time flow and reservoir water surface elevation information, and brochures and maps;
- Enhanced recreation opportunities by providing additional group camping;
- Relieves congestion and improves recreational experience at Indian Bar Rafter Access; and
- Improves dispersed recreation opportunities.

It is anticipated that the USDA-FS will continue to maintain or enhance the current level of recreational facility development and recreation opportunities within Eldorado and Tahoe national forests in the future. Therefore, the Proposed Action in combination with other actions taken by the ENF and TNF will cumulatively enhance recreation in the national forests.

9.4.2 ASRA (Peaking Reach)

The Proposed Action in combination with actions taken by USBR has the potential to affect recreation resources in the Middle Fork American River and North Fork American River downstream of Oxbow Powerhouse (peaking reach). The peaking reach bisects the ASRA, which includes approximately 42,000 acres of land along 40 miles of the North and Middle Fork American rivers (Map 9-1).

ASRA is comprised primarily of federal lands that Department of Parks and Recreation (California State Parks) manages through a service contract with the USBR, the primary landowner. Other federal lands located within ASRA include lands owned by the Bureau of Land Management (BLM), United States Department of Agriculture-Forest Service (USDA-FS), and the United States Army Corp of Engineers (USACE).

ASRA is currently managed in accordance with an Interim Resource Management Plan that was prepared in 1992. According to this plan, management along the peaking reach emphasizes stream-based recreation. Because of minimal non-commercial use levels, use by the commercial sector (e.g., commercial whitewater boating operations) is recognized as the primary public use on the Middle Fork American River (USBR 1992).

Implementation of the Proposed Action will enhance stream-based recreation opportunities along the peaking reach and in ASRA, as summarized in the following:

- The Instream Flow and Reservoir Minimum Pool Measure (PCWA 2010a; SD A) contains a provision that formalizes a release schedule for whitewater boating in the Tunnel Chute Run and enhances recreational boating downstream on three additional runs, as described in Section 8.9 – Recreation Resources Environmental Effects.

- The Proposed Action increases minimum instream flows in the peaking reach compared to the No-Action Alternative in most water-year types. In addition, the Proposed Action includes a reduction in the ramping rate of Oxbow Powerhouse flow releases, and during the driest water year types, a 900 cfs maximum release from Oxbow Powerhouse from Memorial Day weekend to Labor Day. Reducing the magnitude of flow fluctuations will improve food production for fish (aquatic macroinvertebrates), increase effective spawning habitat, reduce potential stranding, benefit young-of-the-year fish, and increase the abundance of fish in the peaking reach. The Proposed Action will enhance the fishery and; therefore, enhance angling compared to the No-Action Alternative.
- The Proposed Action reduces the ramping rate of Oxbow Powerhouse compared to the No-Action Alternative. Reducing the ramping rate will enhance recreation in the peaking reach by slowing the rate at which flows change; thereby, providing recreationists more time to modify their activities to changing flow conditions.
- The Recreation Plan (PCWA 2010c; SD A) contains measures to enhance recreation opportunities at the Indian Bar Rafting Access by relieving congestion in the unloading area and at the boat ramps, and by improving sanitation conditions.
- The Recreation Plan (PCWA 2010c; SD A) contains measures to: (1) provide real-time flow information to the public from two stream gages on the peaking reach; and (2) provide the public with a matrix showing when recreation flows released from Oxbow Powerhouse will arrive at Fords Bar, Ruck-a-Chucky Recreation Area, Mammoth Bar, Poverty Bar, the Confluence, Birdsall Access, and Oregon Bar Access Point.
- The Recreation Plan (PCWA 2010c; SD A) also includes commitments by PCWA to fund resource agency administrative oversight activities, and routine operation and maintenance activities at the Indian Bar Rafter Access.

It is anticipated that the USBR will continue to maintain the current level of recreational facility development and recreation opportunities within ASRA in the future. Therefore, the Proposed Action in combination with other actions in ASRA will cumulatively enhance recreation in the peaking reach.

9.5 CUMULATIVE EFFECTS ON GLOBAL CLIMATE CHANGE (GREENHOUSE GAS EMISSIONS)

Global climate change is the common nomenclature used to describe an increase in the average temperature of the Earth's atmosphere and oceans, and its projected continuation. The causes of global change have been linked to both natural processes and human actions. According to the Intergovernmental Panel on Climate Change (IPCC), increasing greenhouse gas (GHG) concentrations resulting from human activity, such as fossil fuel combustion and deforestation without adequate revegetation, have

been largely responsible for human-induced global warming (IPCC 2007). Increases in the concentrations of GHGs in the atmosphere decrease the amount of solar radiation reflected back into space, intensifying the natural “greenhouse effect” and resulting in the increase of global average temperatures. The most common GHGs are carbon dioxide (CO₂) and water vapor, but there are also several others, including methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆), as described in Section 7.15 – Air Quality Affected Environment.

The potential heat trapping ability of each of the GHGs varies substantially. To account for these differences in warming effect, GHGs are defined by their global warming potential (GWP). The GWP value for a GHG depends on the time span over which it is calculated and on how the gas concentration decays in the atmosphere over time. For that reason, slightly different GWP values appear in scientific literature. This assessment is based on the use of the widely accepted IPCC GWP values for a 100-year period. Under this methodology, the GWP of CO₂ is set to 1, the GWP of CH₄ is 23, and the GWP of N₂O is 296 (IPCC 2007). In this analysis, GHGs are reported as carbon dioxide equivalents (CO₂e) to measure their relative potency. CO₂e takes into account the relative potency of the non-CO₂ GHGs and converts quantities to an equivalent amount of CO₂, so that all emissions are reported as a single quantity.

This analysis focuses on the potential incremental (cumulative) effects of the Proposed Action on GHG emissions within California considering legislation developed in the state to address global warming from past and current projects and reasonably foreseeable future projects. At present, the State of California is the controlling legal authority on GHG emissions within the Project area. The following compares GHG emission between the Proposed Action and No-Action Alternative in context with overall GHG emission in California.

The MFP, under the No-Action Alternative, generates electricity via renewable, hydroelectric power. Hydroelectric power from the MFP is produced at five Project powerhouses with a total installed capacity of 223.7 megawatts (MW) and an annual average energy production of 1,036,125 megawatt-hours (MWh)¹ under the No-Action Alternative. PCWA owns and operates the MFP and is an independent generator (wholesaler of electricity) that sells electricity to California’s electrical retailers via the California electricity grid.

Conventional hydroelectric generation is a reliable, efficient, economical, and less-polluting source of energy resulting in low air emissions. Energy from the MFP is used to meet California’s energy demand, renewable energy goals, and provide a source of energy with low GHG emissions (refer to Section 7.15 – Air Quality Affected Environment for a description of applicable GHG statutes and programs). The MFP hydroelectric facilities do not produce net emissions of GHGs, rather the MFP produces

¹ Based on 40 years of operation: 1967–2007 (historic annual average).

an “offset” in terms of the GHGs that would otherwise be generated on the grid. Existing MFP generation results in a total offset of 338,756 metric tons (MT) CO₂e annually.

Under the Proposed Action, several construction projects will improve operations and maintenance of the MFP, enhance environmental resources, and/or provide for implementation of new environmental programs and measures. GHG emissions resulting from the construction activities associated with the Proposed Action are provided in Section 8.15 – Air Quality Environmental Effects and Appendix C2 – Construction Air Quality Emissions Model. In summary, short-term construction activities associated with implementation of the Proposed Action will increase the state’s overall GHG emissions by 758 tons per year, which represents an increase of only 0.0002% (California’s current GHG emissions are 461,000,000 tons of CO₂e per year). These construction emissions will be temporary and intermittent, and will cease upon completion of work. Therefore, impacts of MFP construction activities on global climate change are negligible.

Further, under the Proposed Action, annual electric generation from the MFP will decrease by an average of 4.79% due to higher instream flow releases identified in the IFRM (PCWA 2010a; SD A). This equates to an annual generation loss of 49,630 MWh and results in an overall annual average energy production of 986,495 MWh. Under the Proposed Action, this reduction in generation decreases total GHG offset by 16,226 MT CO₂e annually (from 338,756 MT of CO₂e to 322,530 MT of CO₂e). Despite this reduction, the net beneficial effect of the MFP is considerable in terms of GHGs emissions.

The slight reduction in net GHG emissions offsets under the Proposed Action has a negligible effect on global climate change for several reasons. PCWA is an independent generator (wholesaler of electricity) of power produced from the MFP. Electric energy retailers will have to replace the loss of generation. It is unknown what source will provide the replacement generation as this is dependent on a retailer’s individual system-wide generation portfolio. However, any replacement generation acquired by the retailers must be consistent with the legislative mandates adopted by the State of California requiring reductions in statewide GHG emissions from current levels. These include:

- **Assembly Bill 32** (AB 32) that codifies California’s goal of reducing statewide emissions of GHGs by 2020 to 1990 levels. This reduction will be accomplished through an enforceable statewide cap on global warming emissions; and
- **Executive Order S-3-05** that establishes GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80% below 1990 levels.

Despite the loss of generation associated with implementation of the Proposed Action, the MFP will continue to produce electric energy with low GHG emissions and operation of the MFP will continue to provide a valuable offset for GHGs. The MFP’s

continued operation, even considering the loss of generation, helps California move toward a lower carbon future, and meet the goals of AB 32 and Executive Order S-3-05. In addition, electric retailers will have to replace any loss of generation from the MFP with an alternative source that has low GHG emissions to comply with current legislative requirements. Therefore, impacts of the Proposed Action on GHG emissions and the resulting effect on global warming, when considering other projects/actions, are negligible.

9.6 UNAVOIDABLE ADVERSE EFFECTS

No unavoidable cumulative adverse effects have been identified under the Proposed Action.

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TABLES

Table 9-1. Fish Native to the Middle Fork American River Watershed.¹

Name	Habitat	Presence	Management Status ²
Lampreys, <i>Petromyzontide</i>			
Pacific lamprey, <i>Lampetra tridentata</i>	Anadromous, foothills, lowlands	Extirpated (Nimbus/Folsom)	
Salmon, <i>Salmonidae</i>			
Chinook salmon, <i>Oncorhynchus tshawytscha</i>			
Chinook salmon, Spring-run	Anadromous, foothills, lowlands	Extirpated (Nimbus/Folsom)	ST, FT
Chinook salmon, Winter-run	Anadromous, foothills, lowlands	Extirpated (Nimbus/Folsom)	SE, FE
Chinook salmon, Fall-run	Anadromous, lowlands	Extirpated (Nimbus/Folsom)	CSC, FSS
Chinook salmon, Late fall-run	Anadromous, foothills, lowlands	Extirpated (Nimbus/Folsom)	CSC, FSS
Trout, <i>Salmonidae</i>			
Resident rainbow trout, <i>O. mykiss irideus</i>	Foothills, High elevations	Present	
Winter steelhead, <i>O. mykiss irideus</i>	Anadromous, foothills, lowlands	Extirpated (Nimbus/Folsom)	FT
Minnnows, <i>Cyprinidae</i>			
Sacramento hitch, <i>Lavinia exilicauda excilicauda</i>	Lowlands, foothills	Presence not documented	
California roach, <i>Lavinia symmetricus</i>	Foothills	Present	
Sacramento blackfish, <i>Orthodon microlepidotus</i>	Lowlands	Presence not documented	
Hardhead, <i>Mylopharodon conocephalus</i>	Lowlands, foothills	Present	CSC, FSS
Sacramento pikeminnow, <i>Ptychocheilus grandis</i>	Lowlands, foothills	Present	
Sacramento speckled dace, <i>Rhinichthys osculus ssp.</i>	Lowlands, foothills	Present	

Table 9-1. Fish Native to the Middle Fork American River Watershed (continued).¹

Name	Habitat	Presence	Management Status ²
Suckers, <i>Catostomidae</i>			
Sacramento sucker, <i>Catostomous occidentalis</i>	Lowlands, foothills, high elevations	Present	
Surf Perches, <i>Embiotocidae</i>			
Sacramento tule perch, <i>Hysterothorax t. traski</i>	Lowlands, foothills	Presence not documented	
Sculpins, <i>Cottidae</i>			
Prickly sculpin, <i>Cottus asper</i>	Lowlands, foothills	Present	
Riffle Sculpin, <i>Cottus gulosus</i>	Foothills, high elevations	Present	

¹Table adapted from Moyle et al. 1996²Status

- FT = Federal Threatened
- FE = Federal Endangered
- ST = State Threatened
- SE = State Endangered
- CSC = CDFG Species of Special Concern
- FSS = USFS Sensitive Species
- FSC = USFWS Species of Concern

FIGURES

Figure 9-1. Average Monthly Flow Into Folsom Reservoir Under the Proposed Action - Future Demand and No-Action Alternative by Water Year Type.

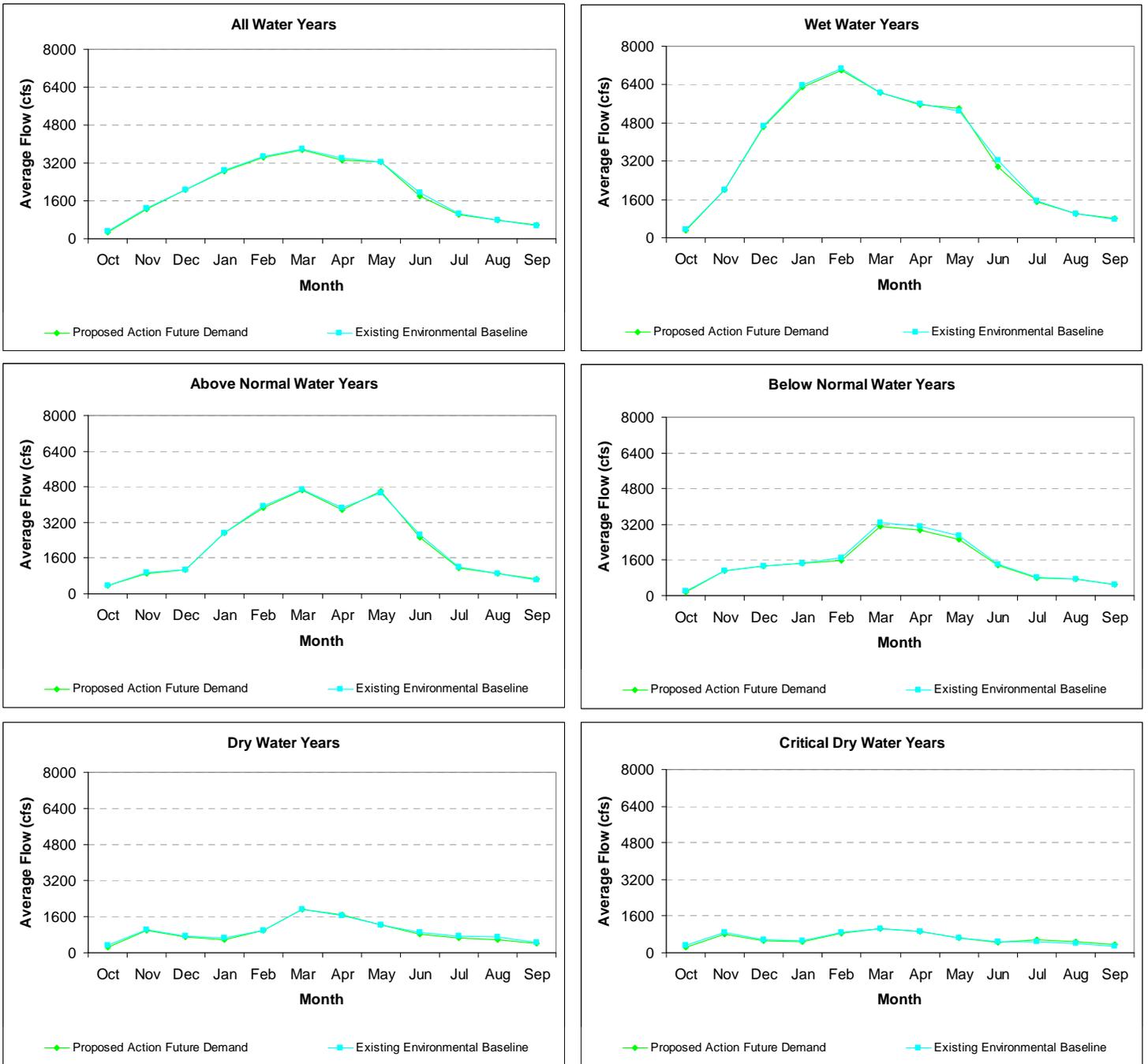
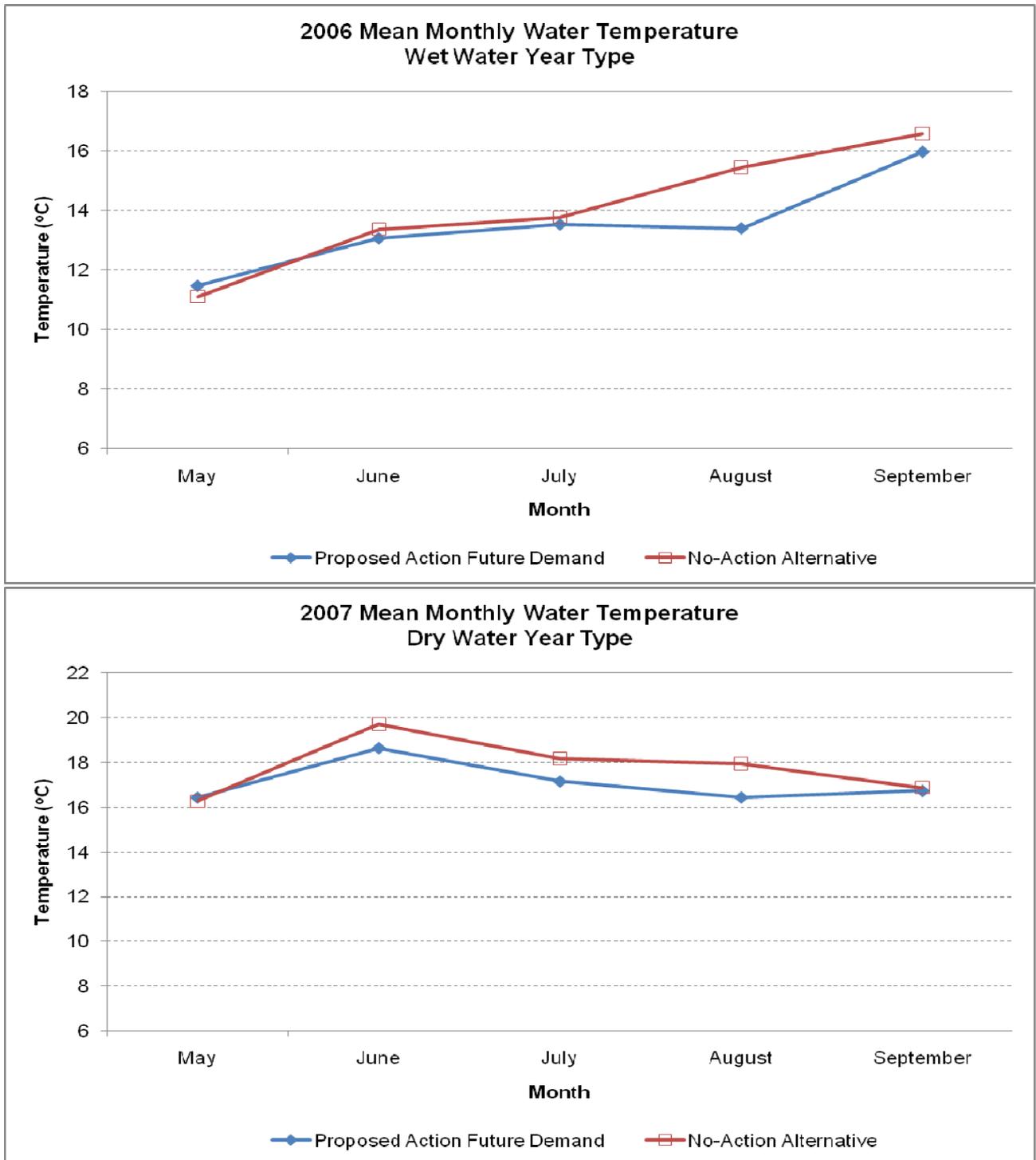


Figure 9-2. North Fork American River Modeled Mean Monthly Water Temperature at the Folsom Reservoir High Water Mark in a Wet Water Year Type (2006) and Dry Water Year Type (2007) Under the Proposed Action - Future Demand and No-Action Alternative.



MAPS