

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426
March 29, 2019

OFFICE OF ENERGY PROJECTS

Project No. 2997-031 – California
Camp Far West Hydropower Project
South Sutter Water District

Brad Arnold
General Manager
South Sutter Water District
2464 Pacific Avenue
Trowbridge, California 95659

Subject: Comments on Draft License Application

Dear Mr. Arnold:

This letter contains comments by Commission staff on the draft license application filed on January 2, 2019, by South Sutter Water District (South Sutter) for relicensing the Camp Far West Hydropower Project No. 2997. In order for Commission staff to have adequate information to assess potential project impacts, please review and address our comments outlined in Appendix A in the final license application.

If you have any questions, please contact Quinn Emmering at (202) 502-6382, or at quinn.emmering@ferc.gov.

Sincerely,

Timothy Konnert, Chief
West Branch
Division of Hydropower Licensing

Enclosure: Comments on the Draft License Application for the Camp Far West Hydropower Project, FERC No. 2997-031

COMMENTS ON THE DRAFT LICENSE APPLICATION FOR THE CAMP FAR WEST HYDROPOWER PROJECT NO. 2997

Commission staff has identified that your draft license application (DLA) did not contain some of the information that will be required by our regulations for a final license application (FLA). In our comments, we note the areas of the DLA where more specific information will be needed for a complete license application.

General Content Requirements

1. In the Initial Statement, Attachment 1 – the Draft Public Notice currently lists December 2018 as the date South Sutter Water District (SSWD) applied to FERC for a new license. Please ensure the filing date is updated with the correct date before submitting the notice for publication to local newspapers as required by section 4.32(b)(6).

Exhibit A – Project Description

2. In section 3.1.1, the first paragraph lists the main embankment of the existing dam as 185 feet high and figure 3.1-1 lists the height as 181 feet high. Please clarify the height of the dam for this section and figure 3.1-1 in the FLA.
3. Section 5.3 states SSWD proposed to add an existing road that accesses the powerhouse. Based on this language it's unclear if SSWD proposes to construct a new road, modify an existing road, or something else. In addition, no details are provided regarding the physical composition, dimensions, or general configuration of the road. Please amend this section in the FLA as required by section 4.51(b).
4. Section 5.4 *FERC Project Boundary* proposes corrections to the existing project boundary around the Camp Far West Reservoir based on higher accuracy elevation data made available since the creation of the original boundary geometry. The DLA states that boundary corrections would be “defined by the lesser of either the topographic contour of 320 feet, which is 20 feet above the normal maximum water surface elevation (NMWSE), or 200 horizontal feet from the NMWSE.” In section 5.1 *Camp Far West Reservoir Pool Raise*, SSWD proposes to raise the NMWSE by 5 feet to an elevation of 305 feet; however, the DLA does not indicate that the proposed project boundary modification takes into account the new 305-foot NMWSE. The proposed 305-foot NMWSE would increase the boundary defining contour to 325 feet. Please clarify this discrepancy in the FLA. In addition, where other sections of the DLA list acreages within the project boundary (e.g. for a particular resource) please note or modify the listed acreages as necessary.

Exhibit B – Project Operation

5. In section 7.1.2 *SSWD's Proposed Conditions in the New License* it appears there is a typographical error under the *SSWD Proposed Condition TR2* subheading where “to exclude boats form” should be modified to “to exclude bats from”. Please amend in the FLA accordingly.

Exhibit C – Construction History and Proposed Construction Schedule

6. In Section 3.1.5 *Construction Sequences and Schedule*, Task 4.7, in Table 3.1-3 *Draft preliminary schedule for construction of the Pool Raise* states that relocation of campsites would last for a duration of 5 days. Further, in Section 3.1.5.9 *Campsite Relocation* you state that relocation would include clearing and grading new campsite areas, clearing and paving access, constructing new campfire pits, and relocating features such as tables, benches, and barbecue grills from existing sites to new sites. In the FLA, please clarify the following:
 - a) When you state that the relocation of campsites would last for a duration of 5 days, does that account for all of the work described in Section 3.1.5.9?
 - b) After all of the approximately 104 recreational facilities and features are relocated, rerouted, or realigned, is there a plan to clean or restore those sites before the pool raise or inundation occurs? Is this activity accounted for in the 5-day time period for relocation?

Exhibit D – Costs and Financing

7. In section 6.2.2, *O&M Costs Related to Environmental and Recreation Conditions*, you state that SSWD's estimated annual cost to implement the conditions (i.e. AR1, TR1, TR2, RR1, and CR1) is \$464,366; however, Table 6.2-1 and Table 6.2-12 show the estimated annualized cost for these measures to be \$440,433. Please clarify in the FLA which cost estimate is the correct total annualized cost for the five proposed environmental and recreation conditions.

Exhibit F – Design Drawings

8. Because design drawings were not included as part of the DLA, staff have no comments on Exhibit F at this time. Please ensure that detailed design drawings are provided in the FLA as required by section 4.51(g).

Exhibit G – Map

9. Please ensure that project boundary and feature data is filed in a geo-referenced electronic format (e.g. shapefiles) in the required format and level of accuracy when filing the FLA as required by section 4.41(h).

10. In Exhibit E, section 3.3.7.1.2 *Other Public Lands* the DLA describes Placer County's Kirk Ranch Conservation Easement (KRCE), and Figure 3.3.7-3 (page E3.3.7-10) appears to show the conservation easement parcel located about 0.5 mile southeast of the Camp Far West Dam, directly adjacent to the project boundary along McCourtney Road, and in close proximity to SSWD's South Shore Recreation Area (SSRA). However, the Exhibit G maps do not show the KRCE, but do include other nonfederal land (e.g. Spencerville Wildlife Area). Because the KRCE appears to be directly adjacent to the project boundary and near the SSRA please include the KRCE on the appropriate Exhibit G maps in the FLA for staff to better evaluate this public land easement in its environmental analysis.
11. On the Project Boundary Change Maps, Sheets 1, 3, and 4, and Sheets 6 through 10, you indicate in the map legend "Proposed Additions" to the project boundary. In some instances, you clearly identify land proposed to be added by pointing to it on the map and identifying the affected parcel (e.g. Sheet 1); however, on Sheets 4, 9, and 10 you do not point directly to proposed land additions. In the FLA, please clearly identify the proposed land additions on Sheets 4, 9, and 10.
12. On the Project Boundary Change Maps, Sheets 7 and 8, you clearly identify private lands north of the reservoir (cross-hatched areas, with APN identified), and the proposed modifications to add additional land to the project boundary within those private lands; however, there appear to be proposed additions of land, outside of the existing project boundary, and SSWD-owned lands, that are not identified as occurring within identified private land (e.g. Sheet 7, east of Valley Road). In the FLA, please clarify if these proposed additions on Sheets 7 and 8 occur within the existing project boundary, or are located within private land.

Exhibit E – Environmental Report

General

13. Please include all completed study reports and any supporting materials with the FLA as required by section 4.38(c)(4)(ii).
14. Section 1.4.2.4 *Collaborative Development of PM&E Measures* states that SSWD and interested parties did not reach agreement on any protection, mitigation, and enhancement measures. Although, collaborative agreement was not reached the FLA must include descriptions of any measures or facilities recommended by the agencies consulted for the mitigation of impacts on fish, wildlife, and botanical resources, or for the protection or improvement of those resources as required by section 4.51(f). In addition, the FLA must include an explanation of why SSWD

has rejected any measures or facilities recommended by an agency as required by sections 4.51(f). For clarity, please also indicate if no measures have been recommended for a particular resource area under the appropriate resource section(s) in the FLA.

15. The DLA currently does not appear to include all letters from resource agencies or Indian tribes containing comments, recommendations, and proposed terms and conditions, or letters from the public containing comments and recommendations. In the FLA, please include all such consultation documentation as required by section 16.8(f).
16. Although Attachment 3.3.6B provides several maps displaying where the proposed pool raise would impact recreational facilities it does not display inundation zones for other project areas. In order for staff to better understand potential effects on all environmental resource areas please provide similar maps displaying inundation zones overlaid with project facilities and boundaries in the FLA. Where appropriate, please also include any resources (e.g. terrestrial, cultural) that would be potentially impacted by inundation.
17. In order to aid staff's evaluation of potential project effects on environmental resources, please include the following supporting document as an appendix with the FLA:
 - Sycamore Associates. 2013. Biological Assessment: Camp Far West Reservoir Project. FERC No. P-2997. Sacramento, CA

Proposed Action and Alternatives

18. In section 2.1.1.9 *Primary Project Roads and Trails*, and the similar Exhibit A, Section 3.9 *Primary Project Roads and Trails*, you state that there are no primary project roads or primary project trails included as part of the FERC-licensed project facilities; however, in section 3.3.1.3 *Unavoidable Adverse Effects* you state that one, short primary project road is paved and regularly maintained. Additionally, in Exhibit B, section 6.4.2 *Other Facility Maintenance*, you state that routine maintenance activities conducted in the vicinity of project facilities includes road and trail maintenance, and in Exhibit B, section 6.4.2.4 *Road Maintenance* you state that regular inspection of the project access roads occurs during the course of day-to-day project activities and maintenance on project and shared roads occurs as needed. Multiple paved and unpaved roads exist within the North Shore Recreation Area (NSRA) and SSRA, and the Recreation Facilities Plan describes them as access roads and circulation roads, that lead to, and are situated within, formal campgrounds and in what are described as "dispersed use areas" throughout the two recreation areas. You also state that the NSRA and

SSRA do not provide a network of recreational trails, but that the paved and unpaved roads provide a trail experience for visitors. Regardless of the formal or informal nature of the recreational opportunities the NSRA and SSRA provide, recreational visitors and SSWD regularly traverse the paved and unpaved roads to reach destinations throughout the two recreation areas. Additionally, as you state, because the recreation areas do not provide formal trails for hiking, biking, and horseback riding, the roads provide a trail experience for recreational visitors. Please provide the following information as required by section 4.51(f)(5):

- a) The name, location, and purpose(s) of the primary project road mentioned in section 3.3.1.3 *Unavoidable Adverse Effects*.
 - b) The total number of project roads that exist within the project boundary.
 - c) The name, location, and purpose(s) of the shared roads mentioned in Exhibit B, section 6.4.2.4 *Road Maintenance*, related to existing project operations and maintenance.
 - d) The existence or absence of agreements between SSWD and the owner(s) of the shared roads mentioned in Exhibit B, section 6.4.2.4 *Road Maintenance*.
19. In section 2.1.5.2.3 *Bay-Delta Bear River Voluntary Agreement*, the DLA describes the Bear Agreement (a non-license voluntary agreement that expires on December 31, 2035, or sooner if the Bear River agreement were terminated), which provides a transfer of up to 4,400 acre-feet to the California Department of Water Resources during dry and critical water years and calls for the licensee to increase flows in the lower Bear River by no more than 37 cubic feet per second (cfs) from July through September, as measured immediately downstream of the diversion dam. This flow is in addition to the 10 cfs minimum flow required in the project license. At the end of the flow release period, the agreement also calls for a down ramp at a rate not to exceed 25 cfs over a 24-hour period to avoid stranding anadromous fish.
- So staff can understand the rationale for the implementing the Bear Agreement, please describe in detail:
- a) its objective(s);
 - b) the years in which the agreement was implemented;
 - c) whether the objective(s) were met in years it was implemented; and
 - d) the reasons for not proposing to implement the agreement as a requirement of a new license.
20. In section 2.2.2 *Change to Existing FERC Project Boundary*, you state that the Camp Far West 60-kilovolt (kV) transmission line is part of the Camp Far West

Hydroelectric Project (P-2997). There appears to be a typographical error, because as the paragraph further explains the Camp Far West 60-kV transmission line is no longer part of the Camp Far West Hydroelectric Project, rather it is part of PG&E's Camp Far West Transmission Line Project (P-10821). In the FLA, please correct the typographical error for this section, and any additional sections where this error may occur.

Aquatic Resources

21. In section 3.3.3.3.2 *Effects of Proposed Project Operations and Maintenance*, the DLA provides an analysis of flows and water temperature at the 80 percent maximum weighted usable area (WUA) for Chinook salmon in the lower Bear River. The analyses suggests that the flows necessary to meet 80 percent maximum WUA results in excessive variability between improved and reduced habitat and increased water temperature detrimental for Chinook salmon. SSWD should consider an analysis of lower minimum flows that achieve less than maximum WUA for Chinook salmon in the lower Bear River that may produce water temperatures within a suitable range for Chinook salmon. Such an analysis should include evaluating WUA and water temperatures using small incremental increases in the existing minimum flows, rather than just the 80 percent WUA analysis presented in the DLA.

Terrestrial Resources

22. Section 3.3.4.1 *Affected Environment – Vegetation*, states that “the area within the proposed FERC project boundary encompasses 2,661.9 acres”. Please clarify if the acreages reported for the vegetation classifications are based on the proposed project boundary change using the proposed 305-foot NMWSE or the existing 300-foot NMWSE (comment 4 above).
23. Section 3.3.4.1.2 *Special-status Plants* generally describes the 505-acre study area for the Special-status Plants and Non-native Invasive Plants Study, but does not provide a map. Please include a map in the FLA displaying the study area in relation to project features for staff to better understand where the surveys were conducted.
24. In section 3.3.4.1.2 *Special-status Plants* the DLA states that the 505-acre study area selected for SSWD's *Special-Status Plants and Non-Native Invasive Plants Study* consisted of the project's two recreation areas, and areas near the project dam, dikes, spillway, and powerhouse. The DLA explains these areas were selected as this is where SSWD determined that project operations and maintenance activities or project-related recreation could affect special-status plants or spread non-native invasive plant species (NNIP). However, we note that

section 3.3.6.1.1 *Recreation Facilities and Opportunities in and Around the Project Reservoir* describes informal, user-created trails and dispersed camping occurring along the reservoir shoreline. Therefore, it's unclear why such informal recreation activities were not considered as potentially having an effect on special-status plant species or potentially spreading NNIP. Therefore, more detailed information is required in order for staff to better understand and evaluate potential recreation effects on terrestrial resources. In the FLA, please provide additional information on, and effects analysis of, project-related, informal recreation activities on these resources including more detailed information on where, to what extent (e.g. frequency), when, and what activities occur in the project area, including any areas that may occur outside of the existing project boundary.

25. Section 3.3.4.1 *Affected Environment – Vegetation* includes sufficient descriptions and maps of vegetation classifications occurring within the project boundary. Section 3.3.4.3.5 Riparian Habitat below Camp Far West Reservoir provides descriptions and maps of vegetation classifications occurring at two sites (about 0.5 mile each) downstream of the project dam that was selected as part of SSWD's Instream Flow Study, but no further information is provided on vegetation communities occurring on other reaches downstream of the project. Section 3.3.4.2.1 Wildlife Habitat includes a list of wildlife habitats and their respective acreages found within the project boundary.

However, the DLA lacks sufficient information needed for staff to evaluate potential project-related effects on vegetation and terrestrial wildlife in the project area. Operation of the project has the potential to affect riparian vegetation and wildlife habitat downstream of the project as well as habitat outside of the project boundary.

Therefore, in the FLA please provide the information listed below as required by section 4.51(f)(3).

- a) Descriptions and maps of the vegetation communities occurring downstream of the project from the Camp Far West dam to the point of confluence with the Bear River and Feather River.
- b) For all wildlife habitat classifications occurring within and adjacent to the project boundary including downstream of the project dam to the Bear River's confluence with the Feather River provide the following below.
 - Descriptions of the characteristics defining each wildlife habitat classification.
 - A wildlife habitat map displaying all habitat classifications overlaid with project features, facilities, and boundaries.

26. In section 3.3.4.2.4 *Special-status Raptor Study – Swainson’s Hawk*, information pertaining to golden eagles appears to be accidentally included under this subheading. Please modify appropriately in the FLA.
27. In section 3.3.4.3.3 *Wetlands Downstream of Camp Far West Dam*, Table 3.3.4-11 provides basic descriptions of wetlands identified by the National Wetland Inventory (NWI) database as occurring downstream of the project dam to the confluence of the Bear River and Feather River. In order for staff to evaluate potential project-related effects to wetlands occurring downstream of the project please provide a map displaying the locations of all the NWI wetlands listed in table 3.3.4-11.
28. In section 3.3.4.3.1 *Wetlands*, under the subsections Palustrine Unconsolidated Bottom and Lacustrine Unconsolidated Bottom you reference Figure 3.3.4-14, however this figure does not exist, therefore please amend the FLA appropriately.
29. Please define the term “dry season hydrology inputs” used in section 3.3.4.3 *Wetlands, Riparian, and Littoral Habitats of the Project Area*.

Threatened and Endangered Species Resources

30. Section 3.3.5.2.1 *Screening for Potentially-affected ESA-listed Species* states that on August 25, 2015, SSWD generated a list of ESA-listed species. The USFWS considers lists older than 90 days to be out of date. Because the list included in the DLA was generated over 3.5 years ago, please update the list to ensure the list includes all listed species potentially affected by the project. Please amend the FLA with any changes accordingly.
31. As described in the DLA, Valley Elderberry Longhorn Beetle (VELB) is dependent on its host plant, elderberry, which is commonly found in riparian corridors and adjacent uplands. As part of the relicensing studies SSWD conducted the *ESA-Listed Wildlife - Valley Elderberry Longhorn Beetle Study*. The 505-acre study area where surveys for elderberry were conducted consisted of the project’s two recreation areas, and areas around the project dam, dikes, spillway, and powerhouse. The DLA justifies this study area based on where SSWD’s project operations and maintenance activities or project-related recreation could affect elderberry and VELB. However, the DLA notes potential stressors to VELB/elderberry also include competition from non-native, invasive plant species and inundation from the proposed reservoir pool raise. In addition, section 3.3.6.1.1 *Recreation Facilities and Opportunities in and Around the Project Reservoir* describes informal, user-created trails and dispersed camping occurring along the reservoir shoreline. It’s unclear why these potential project-related

effects are not considered in areas outside of the study area, particularly along the reservoir shoreline. We note that SSWD found one elderberry shrub in the study area east of the dam face, on the shore of reservoir; however there was no indication that the shrub was being used by VELB.

In addition, it's unclear if the study area included the areas where informal recreation activities occur and the extent to which informal recreation occurs along the reservoir shoreline or on other project lands where suitable VELB habitat may be present.

Therefore, in the FLA please provide the additional information listed below.

- a) The rationale and any information for why VELB and elderberry surveys were limited to the study area described above and did not include other areas potentially inhabited by VELB, particularly near the reservoir shoreline.
 - b) An analysis of potential project-related effects on VELB and its host plant, elderberry potentially affected by the project, including areas potentially affected outside of the existing project boundary. The analysis should evaluate the potential effects of non-native or invasive plant species, the proposed reservoir pool raise, and any formal and informal recreation activities on this listed species.
32. Section 3.3.5.2.2 *ESA-listed Species Life Histories* states a total of 83 aquatic features were detected and delineated as they may provide suitable habitat for ESA-listed aquatic species [e.g. vernal pool fairy shrimp and California red-legged frog (CRLF)]. Figure 3.3.5-3 includes a map of these aquatic features, however only about 20 features are visible due to the scale of the map. To aid staff in understanding their relative location and potential connectedness within the project area, please modify the map in the FLA so all of these aquatic features are visible.

In addition, please include and appropriately label the “small seasonal impoundment (i.e. stock pond)” referenced in the *California Red-legged Frog* (CRLF) subsection where the U.S. Fish and Wildlife Service (FWS) reported an observation of a CRLF in May 2017.

33. The CRLF subsection references a “second site visit with FWS on February 15, 2018”, however no specific information is provided about the site visit except a brief summary of a discussion that took place. Please clarify in the FLA the objective and location(s) visited during the February 15, 2018 site visit and whether any ESA-listed species surveys were conducted and if any ESA-listed species were observed, including CRLF.

Recreational Resources

34. In Section 3.3.6.1.1 *Recreation Facilities and Opportunities in and Around the Project Reservoir*, subsection NSRA, you cite Figure 3.2.6-1 for the NSRA; however, Figure 3.3.6-1 is the correct figure for the NSRA. In the FLA, please correct the typographical error in this section, and any additional sections where this error may occur.
35. In section 3.3.6.1.1 *Recreation Facilities and Opportunities in and Around the Project Reservoir*, subsection *North Shore Recreation Area, Family Campground*, you state that the facility consists of a total of 80 campsites, including 70 standard sites and 10 recreational vehicle (RV) sites with hookups. You further state that a typical campsite provides opportunities for tent or RV camping, but does not have hookups for water, electric, or sewer. In the FLA, please clarify if RV camping is permitted at all 80 campsites within the NSRA Family Campground.
36. Figure 3.3.6-3 (page E3.3.6-9) appears to show an approximate 4-foot-high cinder-block structure to the right of the concrete picnic table. In the FLA, please identify what purpose that structure serves at that particular campsite, and clarify if a similar structure exists at the second group campsite not pictured in Figure 3.3.6-3, or at any other project campsite.
37. Table 3.3.6-1 (page E3.3.6-2) identifies the Horse Camp as a “Group Campground” located within the NSRA. The subsection Group Campground (page E3.3.6-9) does not describe the Horse Camp; however, the Horse Camp is briefly describe in the Dispersed Use Areas subsection (page E3.3.6-13), although it is not identified as one of the two NSRA Dispersed Use Areas. In the FLA, please clarify which recreational facility area within the NSRA best characterizes the Horse Camp, and describe the existing condition of the Horse Camp site features.
38. Table 3.3.6-1 identifies the picnic sites associated with the SSRA as an amenity located in the Day Use Area. Please clarify if the area described under the *Picnic Area* subsection (page E3.3.6-24) is actually the Day Use Area. Additionally, Table 3.3.6-1, describes the Day Use Area as having a swim beach; however, in the *Picnic Area* subsection, the presence of a swim beach is not mentioned. In the FLA, please clarify if a swim beach is located at this site.
39. On pages E3.3.6-15 and E3.3.6-28, respectively, you describe the NSRA and SSRA Recreational Water System, and state that below-ground components of the system are in fair condition, and above-ground water hydrants and fountains are largely in poor condition. On page E3.3.6-55 you state that the majority of the

underground water distribution system is largely original, and will likely need to be replaced during the new license term to ensure distribution of reliable potable water throughout the NSRA and SSRA. You also state that above-ground water hydrants and fountains will require near-term replacement to meet the demands of the new water treatment facility and upgraded water distribution system.

Additionally, you state that SSWD proposes, in the *Recreation Facilities Plan*, to rehabilitate the Recreational Water System Facilities as they near the end of their useful life; however, in the *Recreation Facilities Plan* you state that SSWD will maintain the system in a condition to meet permit requirements, and upgrade the facilities as needed, depending on equipment life and regulatory requirements.

The DLA does not provide descriptions of a timeframe to replace the components of the system that are in fair and poor condition, any materials to be used, demolition of the existing components, and construction of the new components.

In the FLA, please include the following information listed below.

- a) An approximate timeframe to replace the components of the Recreational Water System described as being in fair and poor condition, and a proposed schedule of construction.
 - b) The processes that would be used when installing the new components.
 - c) The materials that would be used for construction of the new components (e.g. continuously-extruded HDPE pipe).
40. In Section 3.3.6.2.1 *Effects of Construction-Related Activities* you describe potential effects to approximately 104 existing recreational facilities and features caused by SSWD's proposed Camp Far West Reservoir pool raise. On page E3.3.6-50, you describe that the majority of construction would occur outside of peak recreation season, or would be restricted to select areas, and during low-use times, if required during peak recreation season, and would be completed within one calendar year. Although you state that a variety of recreational facilities and features would be relocated, rerouted, or realigned to avoid or mitigate for inundation caused by the pool raise, you do not provide a schedule for relocating, rerouting, or realigning the recreational facilities and features. Additionally, you do not describe potential affects to existing project facilities, not directly affected by the inundation, which could be affected by relocating, rerouting, or realigning the approximately 104 facilities impacted by the inundation. Further, you do not provide drawings showing the proposed relocation, rerouting, or realignment of the approximately 104 affected recreational facilities and features. In the FLA, please provide the following information:
- a) A construction schedule for relocating, rerouting, or realigning the approximately 104 recreational facilities and features.

- b) Drawings for the proposed relocation, reroute, or realignment of the approximately 104 recreational facilities and features affected by the pool raise. These drawings should also indicate potential relocations, reroutes, or realignments of any recreational facilities, not directly affected by the inundation, which could be affected by relocating, rerouting, or realigning the approximately 104 facilities impacted by the inundation.
- c) A description of potential effects to any recreational facilities, not directly affected by the inundation, which could be affected by relocating, rerouting, or realigning the approximately 104 facilities impacted by the inundation.

Land Management and Aesthetic Resources

- 41. In Exhibit G, Sheet 3, you indicate three areas of land would be incorporated into the project boundary for the purpose of recreational use. However, you fail to mention this proposed addition of land in the Recreation Resources and Land Use sections. In the FLA, please provide the following information in the appropriate Exhibit E section:
 - a) The current (if available) and proposed recreational uses of the three areas of land proposed for incorporation into the project boundary.
 - b) Environmental effects of incorporating the three areas of land into the project boundary as it relates to recreational use (current and proposed) and land use.
- 42. In Section 3.3.7.2 *Environmental Effects* (page E3.3.7-17) you state SSWD proposes a Pool Raise of five feet, modifications of existing recreation facilities, and modification of the existing project boundary; however, you fail to mention the addition of a new primary project road for accessing the Camp Far West Powerhouse, and the environmental effects associated with the new primary project road. In the FLA, please include your proposal for the addition of the new primary project road, and describe the environmental effects of adding this road, including environmental effects caused by future operations and maintenance activities related to use of the new primary project road.
- 43. In Section 3.3.7.1.2 *Land Use*, you state that no public land occurs within the existing FERC project boundary; however, you further state that an area designated as the California National Historic Trail, that is administered by the National Park Service, runs through the FERC project boundary, and crosses Camp Far West Reservoir in two locations, in the northern portion of the reservoir. You also state that the section of trail within the project boundary is not a “developed” trail. In the FLA, please clarify your statement that no public land occurs within the existing FERC project boundary, and your statement that the trail is not a “developed” trail.

44. In Section 3.3.7.1.4 *Project-Related Land Use Permits and Easements*, you state that SSWD does not require or hold any land use permits or easements for the project, other than from the few private landowners within the project boundary. In Section 3.3.6.2.1, *Camp Far West Reservoir Dam Pool Raise* you do not list or describe permits or easements for the five private parcels where lands are proposed to be added to the project boundary. In the FLA, please list and describe permits or easement agreements that SSWD has procured for the five private parcels that would be impacted by changes to the existing project boundary for the purposes of adding the Camp Far West Dam access road, and for the changes to the NMWSE for the pool raise.

45. In Exhibit A, Section 5.0 *Proposed Changes to Existing Project* you list three changes, including SSWD's proposals to: 1) incorporate an existing, private access road into the project as a primary project road to access the Camp Far West Powerhouse; and 2) modify the existing project boundary (which, in part, would allow SSWD to incorporate the existing, private access road into the project). In Exhibit E, Section 2.2.2 *Change to Existing FERC Project Boundary*, you mention the proposal to modify the project boundary to add areas that encompass rights-of-way for road access to the Camp Far West Powerhouse, in order to maintain the dam outlet and powerhouse. Additionally, in Exhibit E, *Land Use Section 3.3.7.1.5 SSWD's Vehicular Access to Project Facilities for Operation and Maintenance* you mention a short, private access road that is currently used to access the powerhouse and dam; however, in *Land Use Section 3.3.7.2 Environmental Effects*, you fail to describe potential environmental effects related to incorporating the existing private access road into the project as a primary project road. In the FLA, please describe potential environmental effects of incorporating the existing private access road into the project as a primary project road.