

SOUTH SUTTER WATER DISTRICT

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

SUBJECT: Camp Far West Hydroelectric Project
FERC Project No. 2997-031
Relicensing Studies

Dear Secretary Bose:

This letter provides to the Federal Energy Regulatory Commission (FERC) detailed plans for the 14 studies that the South Sutter Water District (SSWD) is performing in support of its relicensing of the Camp Far West Hydroelectric Project, FERC Project Number 2997 (Project).

BACKGROUND

SSWD owns and holds the existing FERC license for the Project, a water power project in Yuba, Nevada and Placer counties, California, on the Bear River. The Project is composed of Camp Far West Dam and Reservoir, Camp Far West Powerhouse, and two recreation areas on Camp Far West Reservoir. The current FERC license for the Project expires on June 30, 2021.

On March 14, 2016, SSWD filed with FERC a Notice of Intent to File an Application for New License, a Pre-Application Document (PAD) and a request to use FERC's Traditional Licensing Process (TLP). The PAD described existing, relevant and reasonably available information regarding resources potentially affected by the Project, and included detailed plans for 15 studies that SSWD proposed to perform to augment existing information.

On May 13, 2016, FERC issued a Notice to Proceed and approved SSWD's request to use the TLP.

On June 27, 2016, SSWD conducted a site visit and held a joint agency and public meeting - the purpose of which was to provide agencies, Indian tribes and members of the public an opportunity to discuss the information in the PAD, discuss data and studies to be developed by SSWD, and express their views regarding resource issues that should be addressed in SSWD's application for new license.

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On July 29, 2016, SSWD filed with FERC proof that the site visit and joint meeting were properly noticed, and a transcript of the joint meeting.

SSWD received seven comment letters on the PAD. These were from: 1) the United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS); 2) the United States Department of the Interior, Fish and Wildlife Service (USFWS); 3) the California State Water Resources Control Board (SWRCB); 4) the California Department of Fish and Wildlife (CDFW); 5) the California State Historic Preservation Office (OHP); 6) the United Auburn Indian Community (UAIC); and 7) the Foothill Water Network (FWN).¹

MODIFICATIONS TO SSWD'S PROPOSED RELICENSING STUDIES

SSWD carefully reviewed the seven comment letters, and identified 63 individual requests² for modifications to SSWD's proposed studies, and requests for 10 studies not proposed by SSWD (i.e., new studies). SSWD also identified 30 general comments. If a request for study modification or new study or general comment was missed and not replied to in this letter, it was inadvertent, and FERC and stakeholders should not infer that SSWD agrees with the request or comment. Further, SSWD reserves its right to reply in more detail to requests for study modifications and new studies, as appropriate, in later venues. Table 1 shows the number of SSWD-identified requested study modifications by commenter. Table 2 shows the number of SSWD-identified requested new studies by commenter.

¹ FWN's letter was signed by 13 parties that included FWN, California Sportfishing Protection Alliance, Trout Unlimited, Nevada City Rancheria Tribal Council, American Whitewater, American Rivers, Sierra Club – Mother Lode Chapter, Federation of Fly Fishers, Northern California Federation of Fly Fishers, Friends of the River, Dry Creek Conservancy, Friends of Spenceville, and Sierra Streams Institute.

² SSWD found that approximately 25 percent of the 63 individual requested study modifications were identical or very similar to each other. For the purpose of this letter, SSWD considered each of these duplicate requests separately.

Table 1. Number of requested modifications to studies proposed by SSWD in its PAD.

SSWD Proposed Study	NMFS	CDFW	SWRCB	OHP	FWN	USFWS	UAIC	Total
2.1, Water Temperature Monitoring	1	1	1			1		4
2.2, Water Temperature Modeling		1				1		2
2.3, Water Quality								0
3.1, Salmonid Redd Survey	3	3	1			2		9
3.2, Stream Fish Populations	6	5			1	5		17
3.3, Instream Flow		5	1			4		10
4.1, Special-Status Plants and Non-Native Invasive Plants		1						1
4.2, Special-Status Wildlife – Raptors		8				4		12
4.3, Special-Status Wildlife – Bats		8						8
5.1, ESA-Listed Plants								0
5.2, ESA-Listed Wildlife – Valley Elderberry Longhorn Beetle								0
5.3, ESA-Listed Amphibians – California Red-Legged Frog								0
6.1, Recreation Use and Visitor Survey Study								0
10.1, Cultural Resources								0
11.1, Tribal Interests								0
Subtotal by Commenter	10	32	3	0	1	17	0	--
Total Requested Modifications	63							

Table 2. Number of requested new studies.

Requested New Study	NMFS	CDFW	SWRCB	OHP	FWN	USFWS	UAIC	Total
Effects of the Camp Far West Project and Related Facilities on Fluvial Processes and Channel Morphology for Anadromous Fish	1							1
Effects of the Camp Far West Project and Related Facilities on Coldwater Delivery Feasibility for Anadromous Fish	1							1
Vegetation Mapping Study Plan		1						1
Sturgeon Study Plan		1				1		2
Benthic Macroinvertebrate Study Plan		1				1		2
Algal Growth Study			1					1
Evaluation of Migration and Use of the Lower Bear River by Juvenile Chinook Salmon and Other Anadromous Fish Using Two Rotary Screw Traps					1			1
California Red-legged Frog Study						1		1
Juvenile Chinook salmon survival Study						1		1
Large Woody Material and Sediment Transport Study						1		1
Subtotal by Commenter	2	3	1	0	1	5	0	--
Total Requested New Studies	12							

Upon careful consideration, SSWD adopted without modification 14 of the requested study modifications, adopted with modification 26 of the requested study modifications, and did not adopt 23 of the requested study modifications (Table 3). SSWD adopted some elements of five of the requested new studies, and did not adopt eight of the requested new studies (Table 4).

Table 3. Number of requested modifications that SSWD adopted without modification, adopted with modification and did not adopt by studies proposed by SSWD in its PAD.

SSWD Proposed Study	Adopted Without Modification	Adopted With Modification	Not Adopted	Total
2.1, <i>Water Temperature Monitoring</i>	2	2		4
2.2, <i>Water Temperature Modeling</i>	2			2
3.1, <i>Salmonid Redd Survey</i>		7	2	9
3.2, <i>Stream Fish Populations</i>	4	8	5	17
3.3, <i>Instream Flow</i>		8	2	10
4.1, <i>Special-Status Plants and Non-Native Invasive Plants</i>			1	1
4.2, <i>Special-Status Wildlife – Raptors</i>	6	1	5	12
4.3, <i>Special-Status Wildlife – Bats</i>			8	8
Total	14	26	23	63

Table 4. Elements of requested new studies that SSWD adopted.

Requested New Study	Adopted Elements
<i>Effects of the Camp Far West Project and Related Facilities on Fluvial Processes and Channel Morphology for Anadromous Fish</i>	LWM count in Bear River downstream of non-Project diversion dam, course sediment evaluation and gravel permeability in Bear River downstream of non-Project diversion dam
<i>Effects of the Camp Far West Project and Related Facilities on Coldwater Delivery Feasibility for Anadromous Fish</i>	User defined downstream release temperature targets
<i>Vegetation Mapping Study Plan</i>	None
<i>Sturgeon Study Plan</i>	eDNA, snorkel surveys and beach seining in the Bear River downstream of the non-Project diversion dam
<i>Benthic Macroinvertebrate Study Plan</i>	None
<i>Algal Growth Study</i>	None
<i>Evaluation of Migration and Use of the Lower Bear River by Juvenile Chinook Salmon and Other Anadromous Fish Using Two Rotary Screw Traps</i>	None
<i>California Red-legged Frog Study</i>	Additional survey time to monitor for American bullfrog and two additional site visits
<i>Juvenile Chinook salmon survival Study</i>	None
<i>Large Woody Material and Sediment Transport Study</i>	Sediment accumulation in Camp Far West Reservoir

For reference purpose, Attachment 1 to this letter includes SSWD's rational for adopting, adopting with modification, or not adopting each requested study modification. Attachment 2 includes similar rational for each new study request. Attachment 3 includes SSWD's reply to some of the general comments identified by SSWD in the seven comment letters.

SSWD'S RELICENSING STUDIES

Unrelated to the seven comment letters, at this time SSWD is withdrawing one study it proposed in its PAD. The withdrawn study and the reason for its withdrawal is:

- Study 4.3, *Special-Status Wildlife – Bats*. SSWD plans to include in its application for new license a Bat Management Plan that will require SSWD to inspect all Project facilities for bats in the first full calendar year after license issuance and to install and maintain bat exclusion devices where bats are found. Therefore, Study 4.3, *Special-Status Wildlife – Bats*, would provide no additional information to inform license requirements.

Attachment 4 to this letter includes modified detailed study plans for each of the 14 studies SSWD is undertaking to support the relicensing.

SSWD has initiated these studies.

If you have any questions concerning this letter, please contact me.



Brad Arnold
General Manager/Secretary
SOUTH SUTTER WATER DISTRICT

- Attachments:
1. SSWD's Rational for Adopting, Adopting with Modification, or Not Adopting Each Requested Study Modification
 2. SSWD's Rational for Adopting, Adopting with Modification, or Not Adopting Each Requested New Study
 3. SSWD's Reply to Some General Comments in the Seven Comment Letters
 4. Detailed Plans for the 14 Studies SSWD Has Undertaken to Support the Relicensing

cc:

- Quinn Emmering, FERC DC
- Steve Edmondson, NMFS
- Kaylee Allen, USFWS
- Marcos Guerrero, UAIC
- Julianne Polanco, OHP
- Meiling Roddam, SWRCB
- Tina Bartlett, CDFW
- Traci Sheehan Van Thull, FWN