

# SOUTH SUTTER WATER DISTRICT

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Bradley J. Arnold  
General Manager / Secretary  
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October 29, 2019

**Via Electronic Submittal (eFile)**

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 - 1<sup>st</sup> Street, N.E.  
Washington, DC 20426-0001

**Subject: Camp Far West Hydroelectric Project  
FERC Project No. 2997-031  
Response to Additional Information Requests**

Dear Secretary Bose:

On June 30, 2019, South Sutter Water District (SSWD), as owner and operator of the Camp Far West Hydroelectric Project, FERC No. 2997 (Project), filed with the Federal Energy Regulatory Commission (FERC) a Final Application for New License (Final License Application or FLA).

In a letter dated August 30, 2019, FERC directed the additional information (Schedule A to FERC's letter) regarding the FLA. FERC requested the additional information be filed within 90 days of its letter (i.e., by November 28, 2019) except for the revised Historic Properties Management Plan (HPMP) which is to be filed within 120 days (i.e., December 28, 2019).

This letter, which is e-Filed with FERC, provides the additional information requested by FERC related to recreational resources. For clarity, in this letter each of FERC's requests are repeated verbatim followed by SSWD's response. This letter also provides additional details on how SSWD intends to respond to FERC's additional information requests related to supporting information for the proposed pool raise and the revised HPMP.

## **RECREATIONAL RESOURCES**

SSWD filed with FERC an Amended Appendix E2 on October 25, 2019<sup>1</sup>, which included a revised Recreation Facilities Plan. The recreational resources clarifications provided below were incorporated into the revised Recreation Facilities Plan at the sections indicated below.

**Requested Information #1.** *In Table 3.3.6-1 Recreation facilities at the NSRA and SSRA, you identify the presence of a 0.4-mile, 10-foot-wide, dirt recreation road within the North Shore*

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<sup>1</sup> FERC Accession Number 20191025-5254

*Recreation Area (NSRA), Other Facilities; however, in Other Facilities (page E3.3.6-17), you do not mention this 0.4-mile recreation road. In your response, please clarify the existence of this 0.4-mile recreation road, and identify the road surface material.*

SSWD's Reply. The 0.4-mile recreation road in the NSRA is the access road to the private concessionaire residences and maintenance buildings (corrected in Section 2.2.1.7 of the revised Recreation Facilities Plan).

**Requested Information #2.** *In Family Campground (page E3.3.6-6), you state that the circulation roads consist of a one-way, 10-foot-wide dirt road, and two-way, 20-foot-wide paved road; however, in Table 3.3.6-1, recreation road widths for the NSRA Family Campground are described as being 20 feet wide (paved) and 12 feet wide (dirt). In your response, please clarify the correct road width of the dirt road within the NSRA Family Campground.*

SSWD's Reply. The dirt road within the NSRA *Family Campground* is 12 feet wide (corrected in Section 2.2.1.1 of the revised Recreation Facilities Plan).

**Requested Information #3.** *In Group Campground (page E3.3.6-9), you state that the access road to the campsites is dirt-surfaced; however, in Table 3.3.6-1, you state that the road is paved. In your response, please clarify the correct access road surface material within the NSRA Group Campground.*

SSWD's Reply. The NSRA *Group Campground* access road surface is dirt (corrected in Section 2.0, Table 2.0-1, of revised Recreation Facilities Plan).

**Requested Information #4.** *In Dispersed Use Areas (page E3.3.6-13), you state that the Jet Ski Cove and Boss Point access roads are both 12 feet in width; however, in Table 3.3.6-1, you state that recreation roads in this area are 10 feet wide. In your response, please clarify the correct road width of these recreation roads within the NSRA Dispersed Use Areas.*

SSWD's Reply. The dirt roads within the NSRA *Jet Ski Cove* and *Boss Point Dispersed Use Areas* are 10 feet wide (corrected in Section 2.2.1.5 of the revised Recreation Facilities Plan).

**Requested Information #5.** *In Family Campground (page E3.3.6-20), you state that the circulation roads consist of one-way, 12-foot-wide and two-way, 20-foot-wide paved roads; however, in Table 3.3.6-1, recreation road widths for the South Shore Recreation Area (SSRA) Family Campground are described as being 20 feet wide and 10 feet wide. In your response, please clarify the correct road widths of the paved roads within the SSRA Family Campground.*

SSWD's Reply. The paved roads within the SSRA *Family Campground* are 10 feet and 20 feet wide (corrected in Section 2.2.2.1 of the revised Recreation Facilities Plan).

**Requested Information #6.** *In Picnic Area (page E3.3.6-24), you state that the circulation road is dirt and asphalt-paved; however, in Table 3.3.6-1, you state that the road is dirt. In your response, please clarify the correct circulation road surface material within the SSRA Picnic Area.*

**SSWD's Reply.** The roads within the SSRA *Picnic Area* include a 0.3-mile-long, 10-foot-wide, dirt road segment; and a 0.1-mile-long, 10-foot-wide, paved road segment (corrected in Section 2.0, Table 2.0-1, of the revised Recreation Facilities Plan).

**Requested Information #7.** *In Swim Beach (page E3.3.6-26), you state that the circulation road is dirt-surfaced; however, in Table 3.3.6-1, you state that the road is paved. In your response, please clarify the correct circulation road surface material within the SSRA Swim Beach area.*

**SSWD's Reply.** The SSRA *Swim Beach* circulation road is a dirt surface (corrected in Section 2.0, Table 2.0-1, of the revised Recreation Facilities Plan).

### **PROPOSED POOL RAISE SUPPORTING INFORMATION**

FERC's August 30, 2019, letter requested additional supporting information "needed to demonstrate modifications associated with the proposed pool raise, will be safe and adequate to fulfill their stated functions." Specifically, FERC requests:

The supporting information should include, but not necessarily be limited to, stability analyses for water retaining structures associated with the pool raise under normal, flood, and seismic loadings and be in conformance with Chapter 3 of our Engineering Guidelines. The supporting information should also include the results and recommendations of the pending Geotechnical Investigation and Design and any supporting information used to derive the flood and seismic loadings. In addition, we suggest that the stability analyses take into account the effect of any silt load in the reservoir, the effectiveness of any spillway foundation drains, cutoff walls, embankment core wall, embankment buttress berms, or any other stability-enhancing features.

After consulting with FERC's Project Manager, SSWD plans to provide this additional supporting information by December 30, 2019.

### **CULTURAL RESOURCES – REVISED HPMP**

As directed by FERC's August 30, 2019, letter requesting additional information, SSWD is conducting additional consultation with SHPO and interested Indian tribes regarding the HPMP and will file with FERC an amended HPMP by December 30, 2019.

*Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
October 29, 2019  
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Please contact me should you have any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "Brad Arnold". The signature is written in a cursive, slightly slanted style.

Brad Arnold  
General Manager / Secretary  
[sswd@hughes.net](mailto:sswd@hughes.net)

cc: Quinn Emmering, FERC DC  
Parties on FERC's Official Service List for the Camp Far West Hydroelectric  
Project Relicensing, FERC Project No. 2997-031  
Relicensing Participants on Camp Far West Hydroelectric Project's Relicensing  
E-Mail Contact List (via e-mail)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding (Camp Far West Hydroelectric Project, FERC Project No. 2997-031).

Dated in Sacramento, CA this \_\_29\_\_ day of October, 2019.



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