

## APPENDIX E5

# SSWD'S REPLY TO FERC COMMENTS

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In its March 29, 2019, letter, FERC provided 45 comments regarding SSWD's DLA. SSWD has applied an alpha-numeric designation to each comment and provides below a reply to each of the comments, which are repeated verbatim below with the page number from the comment letter.

## **1.0**      **Initial Statement**

**FERC-1 Comment (pg. 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).”*

SSWD's Reply: The Initial Statement in the FLA states the date is June 2019, the correct date.

## **2.0**      **Exhibit A**

**FERC-2 Comment (pg. 1):** *“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.”*

SSWD's Reply: Figure 3.1-1 in Exhibit A of the FLA shows the dam height as 185 ft., the correct height.

**Comment FERC-3 (pg. 1):** *“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).”*

SSWD's Reply: Section 5.3 in Exhibit A of the FLA states that SSWD proposes to add as a Project facility (Primary Project Road) in the new license one existing road, which is on SSWD-owned land within the existing and proposed FERC Project boundaries. The road extends approximately 0.25 miles from a SSWD locked gate at Camp Far West Road to the Camp Far West Powerhouse and Switchyard. The road, which is not open to the public for safety reasons, is used and maintained solely by SSWD to access the Camp Far West Powerhouse and Switchyard, and has an asphalt-paved surface approximately 20 ft wide and shoulder width of approximately 2 feet. The road was constructed when Camp Far West Powerhouse and Switchyard were constructed and is SSWD's only vehicular access route to Camp Far West Powerhouse and Switchyard, but was inadvertently omitted from the existing license as a Project facility. Figure 2.1-1 in Exhibit A and Figure 2.0-1 and Attachment G-1 of Exhibit G of the FLA show the location of the existing road. SSWD's proposal to include the existing road as a Project facility in the new license simply corrects an oversight in the existing license.

**FERC-4 Comment (pg. 1):** *“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.”*

**SSWD’s Reply:** Exhibits A and G in SSWD’s FLA clarify that the proposed FERC Project Boundary around Camp Far West Reservoir corresponds to the 320-foot elevation contour for most of the reservoir, with three general exceptions. The first exception is in areas where the 320-foot elevation counter would result in an excessive amount of land that is not necessary for Project operation and maintenance (e.g., farthest upstream drainage areas that tend to flatten out). In those areas, the Proposed FERC Project Boundary provides an adequate amount of land (approximately 15 feet) for Project operation and maintenance and recreation use. The second exception is around recreation areas. The Proposed Boundary in those areas includes all recreation facilities and adequate lands for a reasonable amount of dispersed recreation near the reservoir. The last exception is near Camp Far West Dam and Powerhouse. In that area, the Proposed FERC Project Boundary encompasses all facilities and an adequate amount of land for Project operation and maintenance. These changes to the existing Project Boundary are shown in Figure 2.0-1 Sheets 1 through 10 in Exhibit G of the FLA and are consistent with the preferred methods of defining project boundaries, as outlined in the FERC Drawing Guide (FERC 2012).

### **3.0 Exhibit B**

**FERC-5 Comment (pg. 2):** *“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.”*

**SSWD’s Reply:** Based on a consensus of USFWS, CDFW and FWN, the bat exclusion device measure has been removed as one of SSWD’s proposals. Therefore, it is not mentioned in Section 7.1.2 in Exhibit B of SSWD’s FLA.

### **4.0 Exhibit C**

**FERC-6 Comment (pg. 2):** *“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?"*

SSWD's Reply: Section 3.1.5 (Table 3.1-3) in Exhibit C of the FLA includes a corrected timeframe of 90 days to complete the recreation facilities relocation (not 5 days) and further states that this work will occur for 90 days but in phases to minimize impacts to recreation area visitors (mostly outside the peak recreation season). Section 3.3.6.2.1 in Exhibit E of the FLA provides additional detail regarding how SSWD proposes to time and complete the recreation facilities relocation. Section 3.1.5.9 of Exhibit C of the FLA includes a description of what recreation facilities and site amenities will be restored, cleaned, removed, or left in place (as-is) prior to inundation.

## **5.0 Exhibit D**

**FERC-7 Comment (pg. 2):** *“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.”*

SSWD's Reply: Section 6.2.2 in Exhibit D of the FLA shows SSWD's estimated costs to implement SSWD's proposed environmental and recreation measures. The costs are consistent among the text in Section 6.2.2 and Tables 6.2-1 and 6.2-2. The costs in the FLA are different than the costs that were in the DLA because SSWD has modified its proposal in the FLA.

## **6.0 Exhibit F**

**FERC-8 Comment (pg. 2):** *“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).”*

SSWD's Reply: Exhibit F in the FLA includes, as CEII, detailed Design Drawings in conformance with 18 CFR 4.51(g).

## **7.0**            **Exhibit G**

**FERC-9 Comment (pg. 2):** *“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).”*

**SSWD’s Reply:** Exhibit G in the FLA includes Project Maps that show SSWD's proposed FERC Project Boundary. The FLA filing includes geo-referenced, electronic format shapefiles that comply with 18 CFR § 4.41(h).

**FERC-10 Comment (pg. 3):** *“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.”*

**SSWD’s Reply:** Exhibit G-1 (Attachment G-1) in Exhibit G of SSWD's FLA shows the KRCE adjacent to the FERC boundary. Likewise, Figure 2.0-1 Sheets 1 and 10 (Pages G-7 and G-16) in Exhibit G of the FLA have the KRCE in the map frame and an entry in the legend.

**FERC-11 Comment (pg. 3):** *“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.”*

**SSWD’s Reply:** Sheets 4, 9 and 10 of Figure 2.0-1 in Exhibit G of SSWD's FLA have callout boxes to clearly identify where "Proposed Additions" to the existing FERC Project Boundary are located. The legend entry "Proposed Additions" clearly indicates if the features are present in the specific map sheet, and callouts on the map identify their exact locations.

**FERC-12 Comment (pg. 3):** *“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.”*

SSWD's Reply: Figure 2.0-1, Sheets 7 and Sheet 8, in Exhibit G of SSWD's FLA are labeled to clearly indicate proposed modifications to the FERC Project Boundary on parcels in which the modification is proposed. In the case of the additions on Sheet 7, the modifications extend to the boundaries on SSWD-owned parcels, and the APN is specified in the callouts in the sheet.

## **8.0**            **Exhibit E**

**FERC-13 Comment (pg. 3)**: *“Please include all completed study reports and any supporting materials with the FLA as required by section 4.38(c)(4)(ii).”*

SSWD's Reply: SSWD provides the results and conclusions of its studies in the appropriate resources section of Exhibit E. Supporting materials for each study are provided on compact disc as Appendix E1 to Exhibit E.

**FERC-14 Comment (pg. 3)**: *“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.”*

SSWD's Reply: Section 1.4.2.1 in Exhibit E of the FLA summarizes SSWD's collaborative development of PM&E measures, noting any agreements and differences between SSWD and PM&E measures suggested by agencies in agencies' written comments on the DLA. Further, Appendices E3, E4 and E6 to Exhibit E of the FLA provide copies of agencies' written comments on SSWD's January 2019 DLA, SSWD's replies to agencies' written comments, and a summary of SSWD's May 13, 2019, meeting with agencies to resolve differences regarding PM&E measures, respectively. Last, each resource section in Exhibit E of the FLA includes a discussion of PM&E measures suggested by an agency in its written comments on the DLA, whether the suggestion was adopted by SSWD and, if not, why SSWD did not adopt the suggestion.

**FERC-15 Comment (pg. 4)**: *“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).”*

SSWD's Reply: As described in SSWD's reply to FERC-14, Appendix E3 in Exhibit E of the FLA provides copies of agencies' written comments on SSWD's January 2019 DLA. These comments include any written agency suggestions regarding PM&E measures. SSWD has not received any other written comments regarding PM&E measures.

**FERC-16 Comment (pg. 4):** *“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.”*

**SSWD’s Reply:** Figure 2.0 in Exhibit G of SSWD's FLA shows the 300 feet and 305 feet elevation contours for the entire Camp Far West Reservoir shoreline, which is the area that would be inundated by the Pool Raise, as well as land ownership and Project facilities in that 5 foot band. Section 3.3.4.4.2 in Exhibit E of the FLA describes potential impacts to terrestrial resources from the Pool Raise, and SSWD's Privileged Cultural Resources Report provides maps showing cultural resources impacted by the Proposed Pool Raise and potential effects.

**FERC-17 Comment (pg. 4):** *“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”*

**SSWD’s Reply:** Appendix E-7 in Exhibit E of the FLA includes the complete Sycamore Associates (2013) document.

## **8.1 Section 2.0 Proposed Actions and Alternatives**

**FERC-18 Comment (pgs. 4 & 5):** *“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.”*

**SSWD's Reply:** Section 5.3 in Exhibit A of the FLA states that SSWD proposes to add as a Project facility (Primary Project Road) in the new license one existing road, which is on SSWD-owned land within the existing and proposed FERC Project boundaries, that extends approximately 0.25 miles from a SSWD locked gate at Camp Far West Road to the Camp Far West Powerhouse and Switchyard. The road, which is not open to the public for safety reasons, is used and maintained solely by SSWD to access the Camp Far West Powerhouse and Switchyard, and has an asphalt-paved surface approximately 20 ft wide and shoulder width of approximately 2 feet. While the road was constructed when Camp Far West Powerhouse and Switchyard were constructed and is SSWD's only vehicular access route to Camp Far West Powerhouse and Switchyard, the road is not identified in the existing license as a Project facility. Figure 2.1-1 in Exhibit A and Figure 2.0-1 and Attachment G-1 of Exhibit G of the FLA shows the location of the existing road. SSWD's proposal to include the existing road as a Project facility in the new license simply corrects an oversight in the existing license.

In comparison to the above closed-to-the-public access road the Camp Far West Powerhouse, SSWD considers existing open-to-the-public roads in the North Shore and South Shore recreation areas to be integral parts of the Project recreation facilities. Section 3.3.6.1 in Exhibit E of SSWD's FLA describes the roads associated with each individual recreation facility in both the North Shore and South Shore recreation areas, and includes a description (i.e., length, width and travel surface) of each recreation-related roads in the North Shore and South Shore recreation areas. Section 3.2 (Table 3.2-1) details the management guidelines that SSWD will follow to maintain the Camp Far West Powerhouse access road and the recreation-related roads over the term of the new license.

**FERC-19 Comment (pg. 5):** *“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.”*

**SSWD’s Reply:** Section 2.1.5.2.3 in Exhibit E of the FLA describes: 1) the objective of SSWD, SWRCB and DWR’s Bay-Delta Bear River Settlement Agreement (Agreement) (i.e., to settle the responsibilities of the SSWD, CFWID and other Bear River water rights holders’ obligations to provide water to implement the water quality objectives of the SWRCB’s May 1995 Bay-Delta Water Quality Control Plan); 2) that the Agreement has been in effect from 2000 through the present; and 3) that the objectives of the Agreement have been met in every year in which the Agreement has been in effect (i.e. the section includes a table showing in which years water was transferred to DWR in accordance with the Agreement).

SSWD does not propose to include the requirements of the Agreement in the new license for the following reasons. First, no Relicensing Participant to the relicensing has suggested the requirements be included in the new license. Second, the requirements in the Agreement resulted from prolonged negotiations to resolve a water rights and water quality issue, which is outside FERC’s jurisdiction under Section 27 of the Federal Power Act. Third, the Agreement has resulted in a paid water transfer and is not appropriately characterized as a PM&E measure (except for the down ramp restriction to avoid fish stranding resulting from the water transfer). Fourth, the release of water in "dry" and "critically dry" years provides little, if any, benefit to aquatic resources in the Bear River because the water is provided in the July through September period when releases are too warm to be of any benefit in the Bear River; and providing benefits to aquatic resources in the Bear River is not the purpose of the Agreement (the principal purpose is to provide Delta outflow). Fifth, the Agreement terminates on December 31, 2035, or sooner if agreed to by SSWD, SWRCB and DWR. Sixth, the Agreement does not contemplate, nor did the parties bargain for, the need to go through a FERC license amendment process to terminate the benefits and obligations of the Agreement.

**FERC-20 Comment (pgs. 5 & 6):** *“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.”*

SSWD's Reply: Section 2.2.2 in Exhibit E of the FLA correctly states that FERC removed the Camp Far West Transmission Line for the Camp Far West existing license in 1991, but the boundary was not modified to reflect the removal of the transmission line. SSWD's proposed Project Boundary shown in the FLA corrects this oversight.

## 8.2 Section 3.3.3 Aquatic Resources

**FERC-21 Comment (pg. 6)**: *“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.”*

SSWD's Reply: Section 3.3.3.3.2 in Exhibit E of SSWD's FLA provides an analysis of fish habitat that would be provided by SSWD's proposed flow releases. As described in Section 1.4.2.4 and Appendix E2 in Exhibit E of SSWD's FLA, understands that most interested agencies tentatively agree with SSWD's proposed flow releases. SSWD considered reasonable modifications to its proposed flow releases.

## 8.3 Section 3.3.4 Terrestrial Resources

**FERC-22 Comment (pg. 6)**: *“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).”*

SSWD's Reply: Section 3.3.4.1 in Exhibit E of the FLA clarifies that the 2,661.9 acres encompass the land between Camp Far West Reservoir's existing NMWSE of 300.0 ft and SSWD's proposed FERC Project Boundary, as shown in Exhibit G of the FLA.

**FERC-23 Comment (pg. 6)**: *“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.”*

SSWD's Reply: Section 3.3.4.1.3 in Exhibit E of the FLA includes Figure 3.3.4-6 showing the 505-acre study area for SSWD's Special-Status Plants Study.

**FERC-24 Comment (pgs. 6 & 7):** *“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.”*

**SSWD’s Reply:** Dispersed recreation and the possible spread of NNIP are discussed in Section 3.3.4.4.2. SSWD considered that dispersed recreation could spread NNIP around the reservoir, however, the surrounding private lands already have a significant number of NNIP occurrences and other vectors can carry NNIP into the Project.

**FERC-25 Comment (pg. 7):** *“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.”*

SSWD’s Reply: Section 3.3.4.1.2 in Exhibit E of SSWD's FLA discusses vegetation downstream of the FERC Project Boundary. Figures 3.3.4-2 to 3.3.4-5 show the locations of VegCAMP communities (and thus, wildlife habitat) within a 250 foot buffer of the Bear River from Camp Far West Dam to the confluence of the Bear River with the Feather River. The only Project operation that could affect downstream vegetation and wildlife is flow, but the proposed changes to Project flows are minimal and are not anticipated to change vegetation communities downstream or impact wildlife using that habitat. There are no Project O&M activities outside of the FERC Project Boundary that might impact special-status wildlife.

**FERC-26 Comment (pg. 8):** *“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.”*

SSWD’s Reply: The Section 3.3.4.2.4 subsection on Swainson's hawk has been updated to include only information related to Swainson's hawk, with specific information on golden eagles removed. The subsection on golden eagle includes all information related to golden eagles.

**FERC-27 Comment (pg. 8):** *“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.”*

SSWD’s Reply: Section 3.3.4.3.3 in Exhibit E of the FLA includes Figure 3.3.4-11 and 3.3.4-12 that show wetlands identified by NWI's database from Camp Far West Dam to the confluence of the Bear River with the Feather River.

**FERC-28 Comment (pg. 8):** *“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.”*

SSWD’s Reply: Section 3.3.4.3.1 in Exhibit E of the FLA references Figure 3.3.4-9, the correct reference. In addition, the figure reference in the FLA is correct in the two subsections; Palustrine Unconsolidated Bottom (PUB) and Lacustrine Unconsolidated Bottom (LUB).

**FERC-29 Comment (pg. 8):** *“Please define the term “dry season hydrology inputs” used in section 3.3.4.3 Wetlands, Riparian, and Littoral Habitats of the Project Area.”*

SSWD’s Reply: Section 3.3.4.3 in Exhibit E of the FLA defines "dry season hydrology inputs" as water inputs during the non-rainy season (approximately May-November), which include

artificial sources, like irrigation runoff from nearby fields and natural sources, such as nearby springs and seeps.

## 8.4 Section 3.3.5 Threatened and Endangered Species Resources

**FERC-30 Comment (pg. 8):** *“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.”*

**SSWD’s Reply:** Section 3.3.5.2.1 in Exhibit E of the FLA includes a screening of USFWS’s database for potentially-affected ESA-listed species that was performed by SSWD on April 30, 2019. The April 30, 2019, screening did not identify any potentially-affected ESA-listed species that were not identified in SSWD’s August 25, 2015 screening.

**FERC-31 Comment (pgs. 8 & 9):** *“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.”*

**SSWD’s Reply:** As described in the Valley Elderberry Longhorn Beetle (VELB) subsection of Section 3.3.5.2.2 of Exhibit E in the FLA, the Sycamore Associates BA, which is included in Appendix E7 in Exhibit E, conducted surveys along the 5-foot band (i.e., elevation 300 feet to 305 feet) along the Camp Far West Reservoir shoreline that would be affected by the Pool Raise, including looking for VELB habitat and indicators. Those surveys, together with the study performed by SSWD during relicensing, are sufficient to assess potential Project effects on VELB. Note that Sycamore did not observe any VELB indicators within the band, but did locate two elderberry shrubs. One of these shrubs, along with the one shrub located during relicensing surveys, may be impacted by the dam raise, as described in the subsection on VELB in Section 3.3.5.3.1 and shown on Figure 3.3.5-1.

As described in Section 3.3.6.1.1, informal shoreline recreation use does occur outside the developed recreation areas, but this use occurs below the NMWSE and for day uses related to water contact activities (i.e., swimming, water skiing, wakeboarding, fishing, etc.). The terrain and private lands surrounding Camp Far West Reservoir are not conducive to non-water contact recreational uses. Overall, the vast majority of informal recreation occurs within the North and South Shore Recreation Areas in the dispersed use areas. Dispersed overnight camping outside the recreation areas while allowed was not observed during the relicensing study season and SSWD is not aware of any areas of recurrent dispersed shoreline camping. As described in the subsection on VELB in Section 3.3.5.3.1, there were signs of use by fisherman in the area of the elderberry located during relicensing surveys, including trails and litter. The use of the area could compact the root system of the shrub, depending on the amount and intensity of the informal recreation. There were no reported signs of informal recreation at the two elderberry shrubs located by Sycamore Associates for the BA. No NNIP were reported around any of the elderberry, so there would be no effect from NNIP.

**FERC-32 Comment (pg. 9):** *“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.”*

**SSWD’s Reply:** Appendix E1 in Exhibit E of the FLA includes a map showing the locations of the numbered aquatic sites included in the SSWD’s relicensing ESA-Listed Species - California Red-legged Frog Study. In addition, the map shows the location of the stock pond examined by SSWD in May 2017. Section 3.3.4.3.2 and 3.3.5 in Exhibit E of the FLA describe vernal pools within SSWD’s FERC Project Boundary. Vernal pools outside of SSWD’s proposed FERC

Project Boundary are not discussed in the FLA because they are not affected by the existing Project or SSWD's Proposed Project.

**FERC-33 Comment (pg. 9):** *“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.”*

SSWD’s Reply: Section 3.3.5.2.2 in Exhibit E of SSWD's FLA clarifies that the visit on February 15, 2018 was a site visit requested by USFWS staff to the sewage pond at the NSRA and the nearby non-Project stock pond, and SSWD's biologist accompanied USFWS staff on the visit to observe only - the visit was not part of a SSWD relicensing study. SSWD's biologist did not perform a protocol-level ESA-listed species survey nor did he observe USFWS's staff performing a protocol-level survey. SSWD biologists recorded one incidental observation of a Sierran chorus frog (*Pseudacris sierra*) in the seasonal stock pond during the visit.

## 8.5 Section 3.3.6 Recreational Resources

**FERC-34 Comment (pg. 10):** *“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.”*

SSWD’s Reply: Section 3.3.6.1.1 in Exhibit E of the FLA references Figure 3.3.6-1, which is the correct reference.

**FERC-35 Comment (pg. 10):** *“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.”*

SSWD’s Reply: Section 3.3.6.1.1 in Exhibit E of the FLA states "RVs are allowed at all 80 campsites, but only 10 campsites have RV hookups."

**FERC-36 Comment (pg. 10):** *“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.”*

SSWD’s Reply: Section 3.3.6.1.1 in Exhibit E of the FLA states "The Tree Site also includes a cinder-block preparation/storage area that does not exist at the other group site."

**FERC-37 Comment (pg. 10):** *“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.”*

**SSWD’s Reply:** Section 3.3.6.1.1 in Exhibit of the FLA includes a separate heading that describes Horse Camp. The Horse Camp is technically for groups and, thus, a group campsite, but it has a specialized use.

**FERC-38 Comment (pg. 10):** *“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.”*

**SSWD’s Reply:** To clarify, Table 3.3.6-1 categorizes all the day use type facilities under the overall category of "Day Use Areas". This overall category includes the picnic areas, day use areas, boat launches, and swim beaches. Also, the facilities are named slightly differently between NSRA and SSRA. At the NSRA, the "Day Use Area" consists of picnic sites and swim beach at the same site; and, thus, the picnic sites and swim beach are described together under the "Day Use Area" facility heading. In contrast, at the SSRA, the picnic sites are separate from the swim beach (i.e., opposite sides of the recreation area); and, thus, the picnic sites are described as part of the "Picnic Area" facility and the swim beach is a separate facility consisting of only the swim beach. SSWD provides this detail as a footnote to Table 3.3.6-1.

**FERC-39 Comment (pgs. 10 & 11):** *“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.”*

- 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)."*

**SSWD's Reply:** Section 3.3.6.2.2 in Exhibit E and Section 3.2 of the Recreation Facilities Plan in the FLA details how and when SSWD will replace the above-ground elements (water hydrants and fountains) and underground elements (piping) of the recreational water system (i.e., underground distribution pipes and connections and above ground hydrants/fountains).

**FERC-40 Comment (pgs. 11 & 12):** *"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."*

**SSWD's Reply:** SSWD is not certain when the new license will be issued. Rather than speculate what the exact recreational uses and patterns will be when the new license is issued, SSWD proposes to wait until after the FERC issues the new license, and before SSWD initiates the Pool Raise, to complete a detailed land survey of the recreation area inundation areas, detailed design drawings, and a schedule for relocating, rerouting, or realigning the approximately 104 recreational facilities and features. Once SSWD has completed the detailed survey, design drawings, and construction schedule, SSWD will be able to accurately identify

any other recreational facilities and uses that may be impacted by the construction work. At that time, SSWD will provide to FERC for approval the detailed information and documents. Deferring development of detailed plans will allow SSWD to best design the relocated, rerouted, or realigned facilities to be consistent with the recreational demand and uses at the time of the new license issuance.

## 8.6 Section 3.3.7 Land Management and Aesthetic Resources

**FERC-41 Comment (pg. 12):** *“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.”*

**SSWD’s Reply:** Section 3.3.6.2.3 in Exhibit E of the FLA addresses the addition of the three parcels to the proposed FERC Project Boundary. SSWD proposes the addition of three areas between the existing FERC Boundary and Camp Far West Road in the NSRA Boss Point Dispersed Area. These lands are currently being used as part of the NSRA for the same dispersed uses as currently described in the Boss Point Dispersed Use Area in Section 3.3.6.1.1 in Exhibit E. These proposed changes are essentially making corrections to the Project Boundary.

**FERC-42 Comment (pg. 12):** *“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.”*

**SSWD’s Reply:** Section 3.3.7.2 in Exhibit E of the FLA states that SSWD proposes to add to the new license the existing Camp Far West Powerhouse Road as a Project Facility (i.e. Primary Project Road), and that addition of the existing road to the license will have no environmental effects. The road is located entirely on SSWD-owned land within both the existing and proposed Project Boundary, is closed to the public due to safety concerns, has been maintained solely by SSWD or Project purposes since the existing Project was constructed and SSWD does not propose any changes to these maintenance activities. The road was included in the study area for SSWD’s relicensing cultural and botanical studies. SSWD’s proposal to include the road as a Project facility in the new license simply corrects an oversight in the existing license. In addition, refer to SSWD’s replies FERC-3, FERC-18 and FERC-45.

**FERC-43 Comment (pg. 12):** *“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.”*

**SSWD’s Reply:** Section 3.3.7.1.2 in Exhibit E of the FLA clarifies that there is no trail, *per se*, but only isolated features of the pioneer trail, graves, monuments, landmarks, historic structures and other traces along the route that have been identified to commemorate existing remnants of the trail (NPS 2015). The nearest trail feature to the Project is California Historic Landmark No. 799-3, Overland Emigrant Trail, commemorating the Pioneer trail on Spenceville Road, lies well beyond the Project Boundary, located approximately 3.5 mi outside of Wheatland (OHP 2015). The section within the FERC Project Boundary contains no public lands or features and is not a ‘developed’ trail with any features, but rather is a line on the map where the trail once existed, as depicted in Figure 3.3.7-1 in Exhibit E.

**FERC-44 Comment (pg. 13):** *“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.”*

**SSWD’s Reply:** SSWD identified six parcels where the Proposed FERC Project Boundary would expand. Section 10.0 in Exhibit H of SSWD’s FLA states that SSWD has notified the landowners by certified mail and provided a description of these boundary changes to them. SSWD is not certain when the new license will be issued or if the new license will include the Project Boundary as proposed by SSWD in its FLA. Rather than speculate what the boundary will be and negotiate new easements for new area to be included in the Boundary in the new license, SSWD proposes to wait until after FERC issues its Final Environmental Impact Statement, which will provide more certainty on the Boundary in the new license, to negotiate the necessary easements with the landowners.

**FERC-45 Comment (pg. 13):** *“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."*

SSWD's Reply: These comments are addressed in SSWD's replies to FERC-3, FERC-18 and FERC-42.

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