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Placer County Water Agency

U.S. DEPARTMENT OF THE INTERIOR — BUREAU OF RECLAMATION

COMMENT CARD
PLACER COUNTY WATER AGENCY/U.S. BUREAU OF RECLAMATION

PCWA AMERICAN RIVER PUMP STATION AND RIVER RESTORATION PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT

NAME:	Mr & Mrs Michael Spinosi
ADDRESS:	11145 Rosemary Drive
CITY/STATE/ZIP:	Auburn, Ca 95603
BUSINESS AND/OR HOME PHONE/FAX:	888-9265
ORGANIZATION (IF APPLICABLE):	

COMMENTS:

We do not object to the river returning to its original status, nor do we object to the pumping station. We do, however object to the recreational facilities being planned. The Pacific St. overlook area would seem more desirable since there are not many residences around there, nor a school. The fire hazard is another consideration at the end of Maidu, since were already had serious fires there. Another reason we object is the proximity of the school close by as well as the many homes all around the area. Traffic would become a major problem as well as noise, crime such as vandalism. We suggest since there are other options along the river to check on to places where there's less population. Everyone in this area is definitely against this project & we will do all we can to stop it from being built.

PLEASE USE THIS TO SUBMIT YOUR COMMENTS ABOUT THE DRAFT EIS/EIR. YOU CAN SEND ADDITIONAL COMMENTS TO:
DRAFT EIS/EIR COMMENTS, SURFACE WATER RESOURCES, INC., 2031 HOWE AVENUE, SUITE 110, SACRAMENTO, CA 95825
JUST FOLD THIS SELF-ADDRESSED SHEET INTO THIRDS, SEAL, STAMP, AND MAIL. THANK YOU.

☑ *Please check here if you would like to be on the project mailing list.*

A. Please refer to Master Response 3.1.10, Project Access.

B. Please refer to Master Response 3.1.9, Fire Management.

C. Please refer to Master Response 3.1.6, Public River Access Features.

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Bay Area Trails Preservation Council

November 6, 2001

American River Pump Station Project
Draft EIS/EIR Comments
Surface Water Resources, Inc.
2031 Howe Avenue
Suite 110
Sacramento, CA 95825

I am writing on behalf of the members of the Bay Area Trails Preservation Council. While the majority of our members reside in counties that make up the greater San Francisco Bay Area, we actively and routinely frequent recreational areas in the Gold Country hiking, horseback riding, mountain biking and pursuing various water sports.

The Auburn/Cool area is an especially popular destination, being only a couple hours drive from most Bay Area communities. The news that recreation in this area could experience severe restrictions due to the proposed project caused us great concern.

The presence of the Western States Trail alone draws a large number of individuals. Many of the participants of both the Western States run and the Tevis Cup ride reside in the Bay Area. They condition and train on the Westerns States Trail year round.

A We urge you to take whatever steps are necessary to minimize any impact on currect recreational opportunities. This is an important and prime recreation destination for a large part of Northern California.

Most Sincerely,

Nancy Sandy
President

P.O. Box 153
Corte Madera, CA 94976

A. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.

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State of California - The Resources Agency
DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov

GRAY DAVIS, Governor

1807 14th Street, Suite 104
Sacramento, CA 95814
(916) 327-8840

November 8, 2001

Mr. Rod Hall
Environmental Specialist
Bureau of Reclamation
7794 Folsom Dam Road
Folsom, California 95630-1799

Mr. Einar Maisch
Director of Strategic Affairs
Placer County Water Agency
144 Ferguson Road
Auburn, California 95604

Dear Messrs. Hall and Maisch:

Thank you for the opportunity to review the Placer County Water Agency American River Pump Station Project Draft Environmental Impact Statement/Environmental Impact Report. The Department of Fish and Game has the following general and specific comments on the report.

A

1. The draft EIS/EIR report relies extensively on computer simulation models to evaluate project-related changes in system characteristics like rate and reservoir storage, and the efforts of these changes on environmental parameters. However, there is no discussion of model limitations, inherent assumptions or simplifications. Nor is there an assessment of the influence of modeling limitations on the conclusions reached about potentially significant project-related impacts, such as changes in water temperature and early-life stage anadromous fish survival.
   - The document should include a discussion of the limitations, assumptions and simplifications inherent in the models used.
   - If the models have the capability of reporting potential error, then this information should be included in the document along with an evaluation of the influence of such error on the conclusions reached about the significance of project-related impacts.
   - If the models cannot account for potential error, then the document should include a discussion on how the models will be or have been validated.

Conserving California's Wildlife Since 1870

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A. A discussion of the assumptions, limitations, and simplifications inherent in the modeling techniques utilized in the fish resources impact analyses can be found in the Draft EIS/EIR (pages 3-57 and 3-58).

Modeling represents the traditional approach to analyzing complex, long-term water distribution issues in California, but the modeling outputs can only serve as planning tools. The modeling outputs used in the Draft EIS/EIR analyses can be used only for comparative purposes, in which the relative potential impacts of two management actions (alternatives) can be evaluated. As stated in the Draft EIS/EIR (pg. 357), modeling outputs used in the analyses are not intended for predicting actual river conditions at specific locations at specific times. Therefore, the implication in the comment that validation of modeling outputs with actual future river conditions is inconsistent with the intended use of model ouputs solely as comparison of alternative operational scenarios.

B. The PROSIM and the water temperature models utilized in the impact analysis in the Draft EIS/EIR use mean monthly flows and water temperatures. The models do not allow for the quantification of daily flow and water temperature changes. While a model using daily timesteps may provide a greater degree of sensitivity, at this time, such a model does not exist. Therefore, the flow and water temperature models are not intended to predict actual conditions which may exist under a project scenario. Rather, the PROSIM and water temperature models are employed to provide a "relative index" for the potential impacts of two separate project scenarios. Biases are equal among alternatives and therefore allow the public and decision-makers to make meaningful comparisons of alternatives. A description of the model assumptions, limitations, and simplifications can be found in the Draft EIS/EIR on pages 3-57 and 3-58.

The PROSIM and temperature models represent the best tool available and an accepted method of comparing potential actions and alternatives. For example, resource agencies utilize similar monthly timestep models in their analyses of potential impacts when preparing biological opinions. In addition, USFWS recently utilized a PROSIM modeling technique to evaluate water resources impacts in the Trinity River Mainstem Fishery Restoration DEIS/EIR.

The use of monthly timestep models is appropriate for the discussion of impacts in a comparative manner. Creating an entirely new approach, or to have analyzed impacts in an entirely qualitative fashion would not have been sufficient. Absent any suggested better method, the extensive modeling of the project scenarios is adequate for the NEPA and CEQA-related impact assessments of the Proposed Project and alternatives. The materials and analysis presented in the Draft EIS/EIR utilize the best available scientific information and methodologies to assess potential project-related impacts.

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Mr. Einar Maisch
November 8, 2001
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B

2. The draft EIS/EIR report evaluates all project-related changes to water temperature and water flow in terms of mean monthly values. Mean monthly values can obscure potentially significant variations in both parameters.
   - We recognize that daily flow and temperature data may not be available for all water bodies in the area of potential project impact or for the entire 69-year period of record considered. However, wherever daily data is available - for example, on the lower American River - it should be used to evaluate and compare modeled results and conclusions about project impacts on the critical life stages of the species of concern.

C

3. Page 2-44, Section 2.4, Table 2-7, Summary of Alternatives and Impacts:
   - The term "***Cumulative Conditions***," is defined further along in the document as including all reasonably foreseeable future actions and/or probable future projects. The term should be defined here as well.

D

4. Page 3-16, paragraph 1: "The goal is to develop a flow release pattern that more closely matches the needs of ***anadromous fish,*** which need more cool water in the fall and ***are not present in the American River in the summer."***
   - Steelhead are present in the river year round. This fact should be acknowledged by replacing "anadromous fish" with "chinook salmon."

E

5. Page 3-43, paragraph 2: "PCWA return flows ***at the confluence between the American and Sacramento River*** would alter the water balance downstream, which may result in a reduction of required Folsom Reservoir releases."
   - PCWA return flows are via the Natomas East Main Canal to the Natomas Cross Canal, which returns to the Sacramento River just Downstream of the Feather River not the American River confluence.

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C. Clarification regarding the impact and environmental protection measures summary table is provided in the Final EIS/EIR, Chapter 2.0, Description of Alternatives. This change does not alter the conclusions presented in the Draft EIS/EIR.

D. The goal presented in the Draft EIS/EIR (pg. 3-16, paragraph 1) is not correct. The actual goal of the lower American River Flow Management Plan is to increase the minimum release requirement for the river in conjunction with establishing an adaptive management process for Folsom Reservoir and lower American River operations, geared toward the protection and enhancement of fish species of priority management concern. Chapter 3.0, Section 3.3.2.1, Hydrologic Framework, Lower American River, (pages 3-15 to 3-16) includes this correction. This change does not alter the conclusions presented in the Draft EIS/EIR.

E. Information regarding PCWA's return flows has been corrected in the Final EIS/EIR, Chapter 3.0, Section 3.4, Water Supply. This change does not alter the conclusions presented in the Draft EIS/EIR.

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Mr. Einar Maisch
November 8, 2001
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If you have questions about these comments or require additional information, please contact Kris Vyverberg, Engineering Geologist-Fisheries Engineering Program, at (916)653-8711.

Sincerely,

Larry Week

Larry Week, Chief
Native Anadromous Fish and Watershed Branch

cc: The Resources Agency
Tim Ramirez
1416 Ninth Street, Suite 1311
Sacramento, Ca. 95814

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Department of Water Resources
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State of California • The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

Gray Davis, *Governor*
Rusty Areias, *Director*

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(916) 988-0205, FAX (916) 988-9062

November 9, 2001

Rod Hall, Environmental Specialist
Bureau of Reclamation
7794 Folsom Dam Road
Folsom, CA 95630-1799

Einar Maisch, Director of Strategic Affairs
Placer County Water Agency
144 Ferguson Road
Auburn, CA 95604

Re: American River Pump Station Project – Draft EIS/EIR Comments

Dear Sirs,

The Department of Parks and Recreation (DPR) has reviewed the draft EIS/EIR for the American River Pump Station Project. The Department supports the Proposed Project, the Mid-Channel Diversion, which meets all three of the project purposes. Those purposes are: 1.) Installing a permanent pump facility for Placer County Water Agency (PCWA); 2.) Eliminating the hazard of the diversion tunnel; And 3.) allowing for all pre-Auburn Dam construction beneficial uses of the de-watered section of river by restoring the river to it's historic channel.

The Department does have some specific concerns regarding the proposed project and the information and analysis in the draft EIS/EIR. Attached are the specific and detailed comments DPR has regarding this project and document. DPR has worked closely with the lead agencies on this project to date and looks forward to working with these agencies and the project consultants in addressing public concerns raised in the review of this document. Please contact the District Planner Jim Micheaels at (916) 988-0513 if you have questions regarding these comments. Thank you.

Sincerely,

Jacqueline Ball

Jacqueline Ball
District Superintendent
Gold Fields District