RECLAMATION
Managing Water in the West

Central Valley Project Water Supply Contracts Under Public Law 101-514 (Section 206): Contract Between the U.S. Bureau of Reclamation and the El Dorado County Water Agency, Subcontract Between the El Dorado County Water Agency and the El Dorado Irrigation District, and Subcontract Between the El Dorado County Water Agency and the Georgetown Divide Public Utility District

Draft Environmental Impact Statement/ Environmental Impact Report

Folsom, California
Mid-Pacific Region

Volume II: Draft EIS/EIR Technical Appendices
State Clearinghouse No. 1993052016

The proposed project consists of a new CVP M&I water supply contract for the El Dorado County Water Agency (EDCWA) under which Reclamation would provide up to 15,000 acre-feet/year from Folsom Reservoir or points upstream. Currently, EDCWA intends to divide the water equally between the El Dorado Irrigation District and Georgetown Divide Public Utility District.

U.S. Bureau of Reclamation, Mid-Pacific Region
El Dorado County Water Agency

July 2009

Mission Statements

The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to Indian Tribes and our commitment to island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

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Draft Environmental Impact Statement/Environmental Impact Report

El Dorado County, California

State Clearinghouse No. 1993052016
State of California

***Lead Agencies*:**
NEPA Lead Agency: U.S. Department of the Interior, Bureau of Reclamation (Reclamation)
CEQA Lead Agency: El Dorado County Water Agency (EDCWA)

ABSTRACT

This proposed action/proposed project is intended to implement those parts of Public Law 101-514 (P.L. 101-514), Section 206, pertaining specifically to the El Dorado County Water Agency (EDCWA) and the need for new water supply entitlements for El Dorado County. Under this new contract, up to 15,000 acre-feet per annum (AFA) of Central Valley Project (CVP) Municipal and Industrial (M&I) water would be made available to EDCWA for diversion from Folsom Reservoir, or from an exchange on the American River upstream from Folsom Reservoir. The contract would provide water that would serve existing and future M&I water needs in El Dorado County, establish and preserve entitlements to divert the water in accordance with State Water Resources Control Board (SWRCB) and Reclamation requirements, and provide new water supplies that would justify future construction, operation, and maintenance of new facilities to convey and treat the diverted water. Direct, indirect, and cumulative impacts resulting from the alternatives on the physical, natural, and socioeconomic environment of the region are addressed in the EIS/EIR.

This Draft EIS/EIR is prepared in compliance with the National Environmental Policy Act (NEPA), Reclamation NEPA procedures, and the California Environmental Quality Act (CEQA) and CEQA guidelines. Reclamation intends to adopt this EIS/EIR to satisfy the requirements of NEPA under P.L. 101-514 to execute a CVP Water Service Contract with EDCWA, as described in this EIS/EIR. The EDCWA intends to adopt this EIS/EIR to satisfy the requirements of CEQA for implementation of the proposed P.L. 101-514 CVP Water Supply Contract with Reclamation, as described in this EIS/EIR.

Comments on this document should be submitted by October 16, 2009.

FOR FURTHER INFORMATION CONTACT:

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APPENDIX A – 1993 PUBLIC AND AGENCY SCOPING

Notice of Preparation
Draft Environmental Impact Report

Central Valley Project Water Service Contract
El Dorado County Water Agency

Prepared by:
El Dorado County Water Agency
330 Fair Lane
Placerville, California 95667
Telephone: 916-621-5392
Facsimile: 916-621-2212

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Notice of Preparation
Draft Environmental Impact Report

Central Valley Project Water Service Contract
El Dorado County Water Agency

The United States Bureau of Reclamation (Reclamation) and the El Dorado County Water Agency (Agency) will jointly prepare an Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for this project. Reclamation will be the lead agency under the National Environmental Policy Act (NEPA) and Agency will be the lead agency under the California Environmental Quality Act (CEQA). Reclamation will publish a Notice of Intent in the Federal Register.

Reclamation and the Agency are soliciting the views of interested parties as to the scope and content of environmental information to be included in the EIS/EIR. Interested parties should comment on the information which is germane to the statutory responsibilities of Reclamation and Agency in connection with the proposed project.

Two public scoping meetings for this project will be held:

Date: Wednesday, May 26, 1993
Time: 3:00 p.m.
Place: El Dorado County Board of Supervisors Chambers
330 Fair Lane
Placerville, California 95667

Date: Wednesday, May 26, 1993
Time: 7:00 p.m.
Place: El Dorado County Board of Supervisors Chambers
330 Fair Lane
Placerville, California 95667

Responses to this notice must be received not later than

Friday, June 11, 1993, at 3 p.m. at Agency offices. The Agency requests that you identify a contact person in your agency in the body of your response.

Responses to this Notice of Preparation should be addressed to:

Robert J. Reeb, General Manager
El Dorado County Water Agency
330 Fair Lane
Placerville, California 95667

Project Description

The proposed project consists of a water service contract with the Agency for use within the service areas of the El Dorado Irrigation District (EID) and Georgetown Divide Public Utility District (GDPUD) in the County of El Dorado. The Agency has entered into discussions with Reclamation to negotiate a long-term water service contract from the Central Valley Project. The contract to be negotiated has been authorized and directed by the Congress as part of Public Law 101-514. The law directs the Secretary of the Interior to enter into a 15,000 acre-foot contract for municipal and industrial purposes to assist in meeting the immediate needs of El Dorado County. Public Law 101-514 directs that water for the Agency be diverted from Folsom Reservoir or upstream on the American River or its tributaries.

Project Location

The Agency proposes to make this water supply available to the El Dorado Irrigation District (EID) and Georgetown Divide Public Utility District (GDPUD) for use within their respective service areas.

EID provides surface water to about 140,000 acres in its existing service area. The latter covers about 30 percent of the County. The District sphere of influence, about 347,000 acres, lies generally along U.S. Highway 50 between the communities of El Dorado Hills and Pollock Pines in the west and east, respectively; and, between the Cosumnes River on the south and the South Fork American River on the north (See Figure 1).

Elevations in the primary District service area range from 500 feet in the west to 4,000 feet in the east. Total annual precipitation ranges from about 25 to 50 inches. The character of the area is predominantly urban, rural residential, agricultural, and open space. The District provides treated water to the communities of Pollock Pines, Camino, El Dorado,

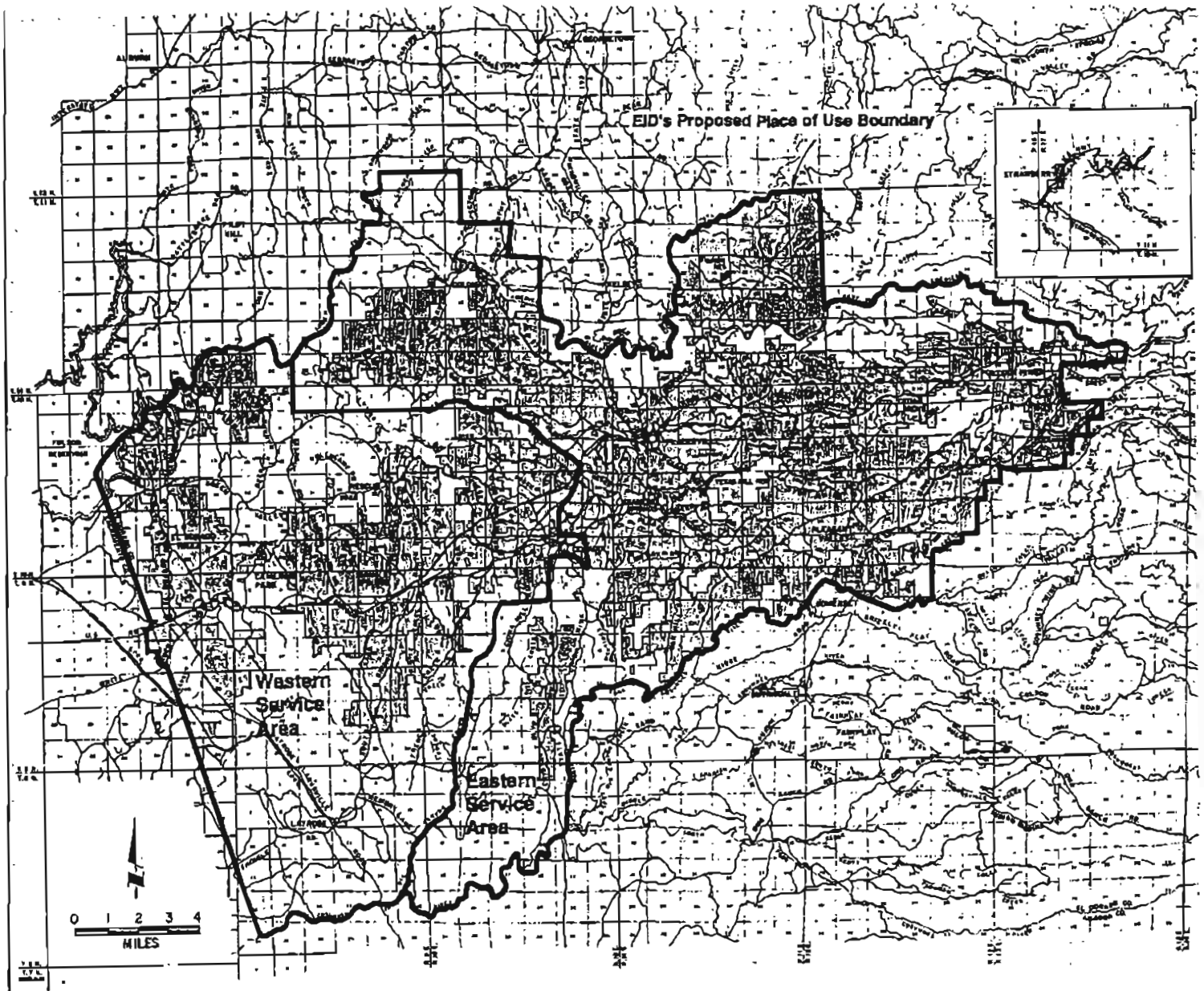


FIGURE 1

EL DORADO COUNTY WATER AGENCY
CENTRAL VALLEY PROJECT WATER SERVICE CONTRACT

EL DORADO IRRIGATION DISTRICT

BOUNDARIES AND SPHERE OF INFLUENCE

PROPOSED PLACE OF USE
IS WESTERN SERVICE AREA

LEGEND

EID Service Area

Diamond Springs, Shingle Springs, Cameron Park, El Dorado Hills. The District also provides wholesale and retail service within the City of Placerville.

GDPUD provides surface water to about 30,000 acres within its service area, of which 2,500 acres are in irrigated commercial crops. The service area encompasses about 75,000 acres or about 6 percent of the County. The sphere of influence, about 173,000 acres, is formed by the drainage boundary between the Middle and North Forks of the American River on the north, and the South Fork of the American River on the south. The area is most accessible by State Highway 193 from the City of Placerville (El Dorado County), and Highways 49 and 193 from Auburn (Placer County) (See Figure 2).

Elevations in the District service area range between 800 feet in the southwest to 3,500 feet in the northeast. Average annual precipitation in the area ranges from about 30 to 60 inches. The character of the service area is predominantly rural residential, agricultural, and open space. The District provides domestic treated water and untreated agricultural water to the communities of Cool/Pilot Hill, Garden Valley, Greenwood, Georgetown, and Kelsey.

Population and Water Demand Projections

Figure 3 presents projections for EID; Figure 4 presents projections for GDPUD.

Preliminary water demand projections prepared by the Agency estimate the future municipal and industrial water needs for the combined EID and GDPUD service areas to be 55,930 acre feet annually in the year 2030. Total system demands including agricultural use and system losses are estimated to be 82,090 acre feet in 2030. The total existing safe yield of the two districts equals 48,780 acre feet per year--a difference of 33,310 acre feet in 2030. The proposed contract is for 15,000 acre-feet per year to meet the immediate needs of the two service areas.

Reclamation, in its preliminary water needs assessment for the American River Water Resources Investigation, estimates municipal and industrial water needs for the combined EID and GDPUD service areas to be 49,000 acre feet annually in 2030. There are two principal differences between Agency and Reclamation estimates: (1) Reclamation projects about 39,000 fewer people in the area than the Agency by 2030 with smaller differences in intervening years; and (2) Agency and Reclamation per capita water use numbers differ slightly. Reclamation

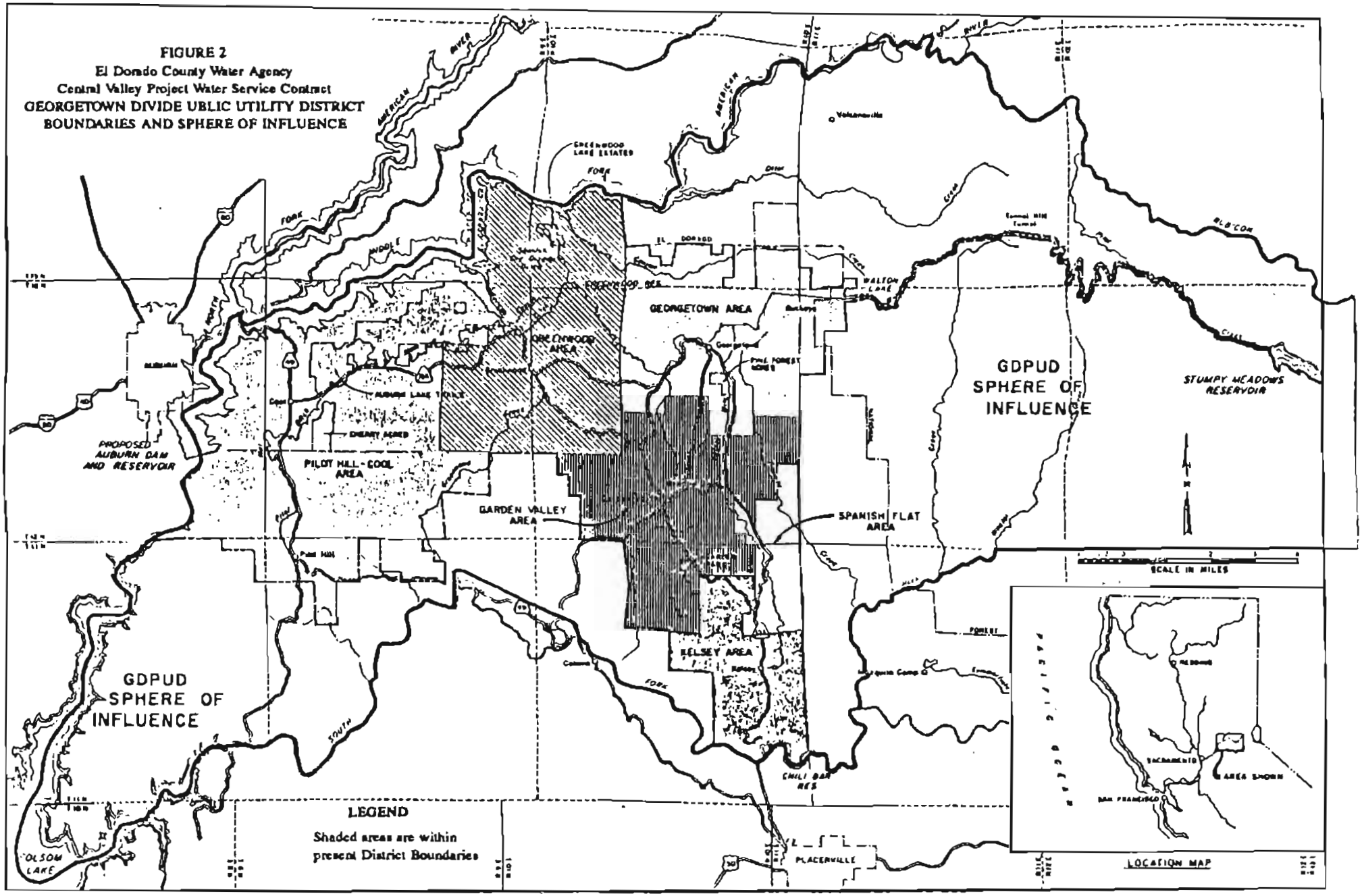


FIGURE 2
El Dorado County Water Agency
Central Valley Project Water Service Contract
GEORGETOWN DIVIDE UBLIC UTILITY DISTRICT
BOUNDARIES AND SPHERE OF INFLUENCE
GDPUD
SPHERE OF
INFLUENCE
GEORGETOWN AREA
GREENWOOD AREA
PILOT HILL - COOL AREA
GARDEN VALLEY AREA
SPANISH FLAT AREA
KELSEY AREA
PROPOSED AUBURN DAM AND RESERVOIR
STUMPY MEADOWS RESERVOIR
GDPUD
SPHERE OF
INFLUENCE
SCALE IN MILES
LEGEND
Shaded areas are within
present District Boundaries
PLACERVILLE
OLSON LAKE
LOCATION MAP
AREA SHOWN

FIGURE 3

EL DORADO IRRIGATION DISTRICT
WATER DEMAND PROJECTIONS
WITH STANDARD WATER FIXTURES AND LANDSCAPING

EID Data	Year 1990	1995	2000	2005	2010	2020	2030
EAST SIDE							
Total East Side Demand, ac-ft	19,970	21,320	21,710	22,000	22,840	27,640	31,120
WEST SIDE							
Dwelling Units, DUs							
Treated Water DUs							
Urban	12,581	15,096	19,686	25,486	32,782	43,129	47,150
Subagricultural	1,197	1,197	1,197	1,197	1,197	1,197	1,197
Agricultural	26	28	28	28	29	32	35
Subtotal Treated DUs	13,804	16,321	20,911	26,711	34,008	44,358	48,382
Untreated Water Accounts							
Agricultural	6	6	6	7	7	7	8
Subtotal Untreated Accounts	6	6	6	7	7	7	8
Treated Water Demands							
Urban							
Unit Criteria, ac-ft/DU	0.55	0.59	0.59	0.59	0.59	0.59	0.59
Demand, ac-ft	6,920	8,020	10,730	14,150	18,460	24,560	26,940
Subagricultural							
Unit Criteria, ac-ft/DU	1.25	1.22	1.22	1.22	1.22	1.22	1.22
Demand, ac-ft	1,500	1,460	1,460	1,460	1,460	1,460	1,460
Agricultural							
Unit Criteria, ac-ft/DU	29.80	27.80	27.80	27.80	27.80	27.80	27.80
Demand, ac-ft	770	780	780	780	810	890	970
System Losses, ac-ft	3,560	3,240	3,450	3,600	3,660	4,750	5,180
Subtotal Treated Demand, ac-ft	12,750	13,500	16,420	19,990	24,390	31,660	34,550
Untreated Water Demands							
Agricultural							
Unit Criteria, ac-ft/Account	29.70	28.20	28.20	28.20	28.20	28.20	28.20
Demand, ac-ft	180	180	180	200	200	200	230
System Losses, ac-ft	70	60	50	40	40	40	40
Subtotal Untreated Demand, ac-ft	250	240	230	240	240	240	270
Total West Side Demand, ac-ft	13,000	13,740	16,650	20,230	24,630	31,900	34,820
TOTAL EID DEMAND, ac-ft	32,970	35,060	38,360	42,230	47,470	59,540	65,940

FIGURE 4

GEORGETOWN DIVIDE PUBLIC UTILITY DISTRICT
WATER DEMAND PROJECTIONS
WITH STANDARD WATER FIXTURES AND LANDSCAPING

GDPUD Data	Year 1990	1995	2000	2005	2010	2020	2030
Dwelling Units, DUs							
Treated Water DUs							
Urban	3,157	3,525	3,935	4,393	4,906	6,378	7,808
Subagricultural	379	423	472	527	588	765	936
Subtotal Treated DUs	3,536	3,948	4,407	4,920	5,494	7,143	8,744
Untreated Water Accounts							
Subagricultural	335	385	435	485	535	635	735
Agricultural	23	23	23	23	23	23	23
Subtotal Untreated Accounts	358	408	458	508	558	658	758
Treated Water Demands							
Urban							
Unit Criteria, ac-ft/DU	0.52	0.59	0.59	0.59	0.59	0.59	0.59
Demand, ac-ft	1,640	1,860	2,100	2,370	2,670	3,540	4,380
Subagricultural							
Unit Criteria, ac-ft/DU	1.22	1.22	1.22	1.22	1.22	1.22	1.22
Demand, ac-ft	460	520	580	640	720	930	1,140
System Losses, ac-ft	370	420	470	530	600	790	970
Subtotal Treated Demand, ac-ft	2,470	2,800	3,150	3,540	3,990	5,260	6,490
Untreated Water Demands							
Subagricultural							
Unit Criteria, ac-ft/account	10.00	10.00	8.33	8.67	5.00	5.00	5.00
Demand, ac-ft	3,350	3,650	4,270	4,600	4,850	5,350	5,850
Agricultural							
Unit Criteria, ac-ft/account	72.00	72.00	72.00	72.00	72.00	72.00	72.00
Demand, ac-ft	1,660	1,660	1,660	1,660	1,660	1,660	1,660
System Losses, ac-ft	2,330	2,250	2,150	2,150	2,150	2,150	2,150
Subtotal Untreated Demand, ac-ft	7,340	7,780	8,080	8,410	8,660	9,160	9,660
TOTAL GDPUD DEMAND, ac-ft	9,810	10,560	11,230	11,950	12,650	14,420	16,150

estimates are based on projections provided by the California Department of Water Resources; the latter were prepared for DWR Bulletin 160-93.

Ongoing studies by Reclamation and the Agency will refine the estimates for future water requirements within the proposed places of use.

Conservation and Demand Side Management

Water conservation and the reuse of water will be pursued to the greatest extent feasible to reduce the need to develop a supplemental water supply. The impact on water demands from water conservation and demand side management is reflected for each district in demand projections.

There have been high percentage unaccounted for water losses in the conveyance and distributions systems of the two districts due to the following reasons: (1) a greater than average reliance on open ditch conveyance systems, and (2) a relatively low density of development in the respective service areas. As indicated in the following tables, present and future improvements to the systems are expected to reduce losses to about 15 percent of total water supply, which is approximately the national average loss rate. These improvements are included in the demand projections used as a basis for the proposed project alternatives.

Loss reduction activities, in and of themselves, cannot supply the entire future water supply demand for either district. For example, losses in the EID service area in 1990 amounted to 9,204 acre-feet. If the delivery system were 100 percent efficient, which is not feasible, the water demand in 2020 would be 18,816 acre-feet per year greater than projected demand. Losses of 15 percent would result in demand exceeding existing supply by 25,798 acre-feet per year.

The implementation of Best Management Practices under the Water Conservation Memorandum of Understanding (California Urban Water Conservation Council) will be evaluated for both districts. The impact of measures for new construction enacted by the State of California since 1992, including water conservation fixtures and landscaping requirements, will result in a notable reduction in water demand for the two districts. In 2030, demand reductions are estimated to be 2,630 acre-feet for EID and 270 acre-feet for GDPUD. The estimated impact of the use of graywater systems in 2030, if found to be feasible, could be 3,860 acre-feet for EID and 380 acre-feet for GDPUD.

Water conservation and water reuse is extremely important for mountain service areas because of the relatively high cost and difficulty of acquiring new water supplies, together with the costs of conveyance, treatment, and water and wastewater disposal. Presently, water conservation in the two districts is implemented through urban water management plans as mandated by the State of California to be updated every 5 years.

Project Alternatives: EID

A number of project alternatives have been evaluated for the EID Service Area pursuant to CEQA in a Program EIR titled "El Dorado County Water Agency Water Program and El Dorado Project for the EID Service Area" (State Clearinghouse No. 72012008). (See Figure 3)

Storage Projects

Texas Hill Project--The Texas Hill Project would consist of a dam and reservoir located on Weber Creek, which has a drainage area of 31.3 square miles and an average annual runoff of 20,900 acre-feet per year. A zone-fill or a roller compacted concrete dam at elevation 1,832 feet would create a reservoir with a storage capacity of 22,000 acre feet and provide a safe yield of about 9,400 acre-feet per year.

Water from the Texas Hill Project could be made available to the EID western service area by direct conveyance to the proposed Bray WTP. Two alternative routes are being considered, one adjacent to Weber Creek and one located higher on the south side of Weber Creek. The alignment on the south side of Weber Creek is the preferred alternative. This project would provide operational flexibility for the EID water system, as well as additional water supplies. The project also could be used to store water imported to the basin using the proposed White Rock Project.

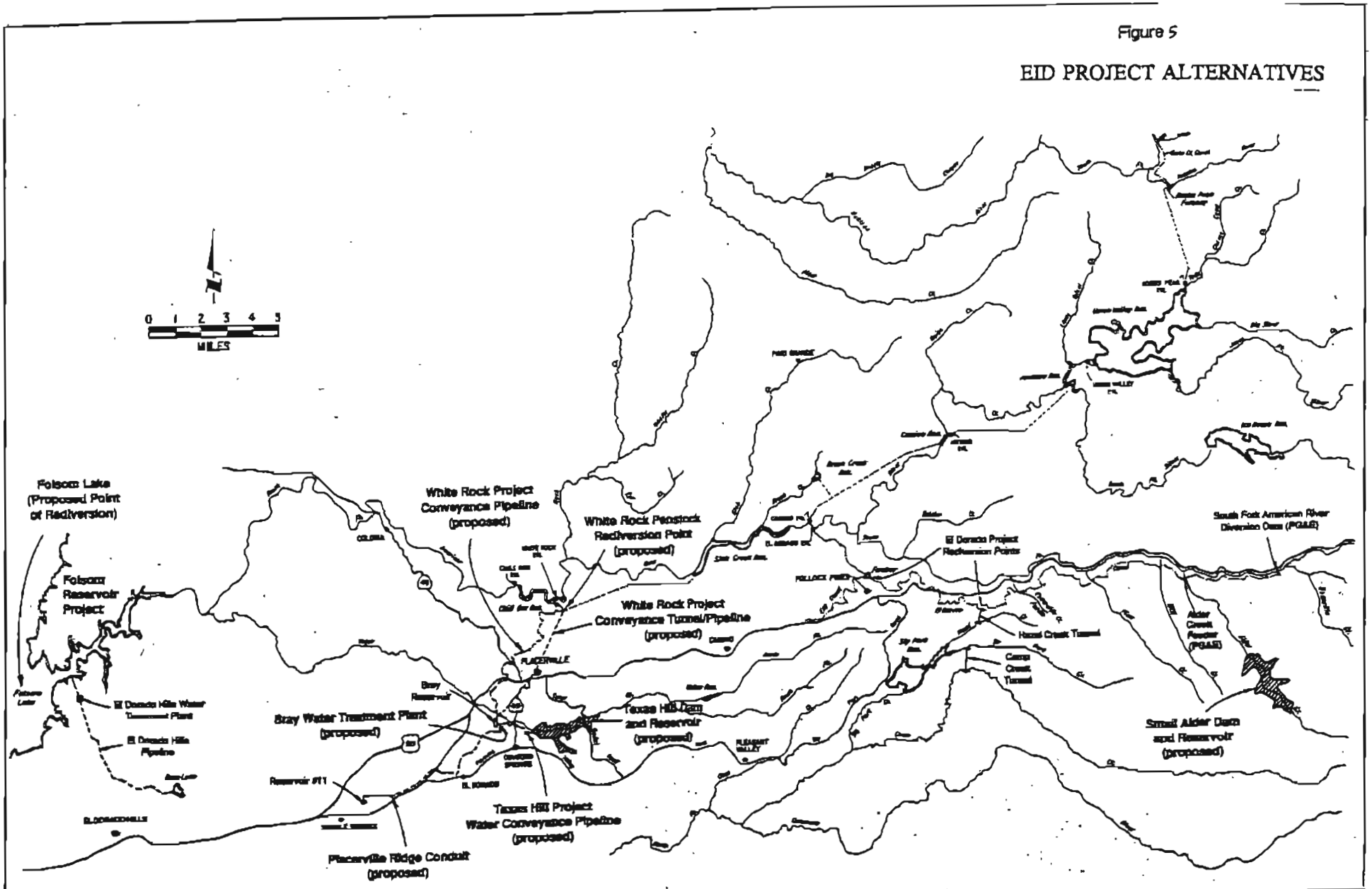
Small Alder Project--The Small Alder Project would consist of a dam and reservoir located on Alder Creek, which has a drainage area of 18.6 square miles and an average annual runoff of 23,400 acre-feet per year. A zoned-fill or roller-compacted concrete dam at elevation 5,320 feet would create a reservoir with a storage capacity of 31,000 acre-feet and provide for a safe yield of about 11,250 acre-feet per year.

Direct Diversion Projects

Water from the Reclamation contract could be made available to the EID Service Area (1) at Folsom Reservoir at the site of an

Figure 5

EID PROJECT ALTERNATIVES



existing intake facility, and (2) at Sacramento Municipal Utility District's (SMUD) White Rock Penstock through EID's proposed White Rock Project.

Folsom Reservoir--EID currently has a CVP contract which totals 7,550 acre-feet per year. Capacity and treatment plant constraints exist within the EID system and will have to be eliminated before additional water can be delivered to the service area. An evaluation of the impacts of the expansion of facilities will be included in this environmental review. The El Dorado Hills Water Treatment Plant (WTP) would have an ultimate capacity of 20 million gallons per day (mgd), enough to handle the existing and proposed contract. A 30-inch raw water line from the booster pumping station adjacent to Folsom Reservoir is also proposed. Excessive pumping, energy use, and conveyance costs would be incurred, however, to serve above the elevation of Cameron Park if this alternative were to be wholly relied on by EID.

White Rock Project--As proposed by EID, this project includes a 4.5 mile pipeline between an existing 36-inch blind, flange turnout on the White Rock Penstock and the proposed Bray WTP near Placerville. The treatment plant would provide water to the western EID service area primarily by gravity flow. The diversion could be made under 1957 and 1961 agreements between SMUD and the Agency. CVP water could be withdrawn from the White Rock Penstock subject to approval by the State Water Resources Control Board (change in point of diversion).

Three alternative project designs have been evaluated for raw water storage at the Bray WTP. Under the first alternative, no raw water storage would be provided and an existing reservoir at Bray would be maintained in its present state. Under the second alternative, the levees surrounding Bray Reservoir would be raised and set back to allow the use of the reservoir for storage of 90 to 100 acre-feet of raw water and filtered backwash from the proposed WTP. Under the third alternative, a new reservoir would be constructed immediately south of the existing Bray Reservoir behind a new 62-foot high dam in a natural ravine. The second alternative is considered the preferred alternative by an EID engineering consultant and was the subject of the Agency Program EIR.

The proposed White Rock Project is currently being evaluated under a Project EIR being prepared by EID (pipeline, Bray WTP, and Placerville Ridge Conduit components).

The WTP would have an initial design capacity of 40 cubic feet per second (26 mgd) and would be designed for expansion in

two additional phases to an ultimate capacity of 120 cfs (78 mgd). The treatment process (combining clarification, filtration, and disinfection) would be capable of meeting current and pending water quality standards, and the plant could be upgraded if federal and state drinking water standards become more stringent. Treatment of the wastewater sludge would be by dewatering, use of drying beds, and direct discharge to the sanitary sewer.

Treated water would be stored at the Bray WTP in aboveground cylindrical tanks (one 5-mgd tank initially, with another 5-mgd tank to be added) and in EID's existing Reservoir 11 for distribution.

The Placerville Ridge Conduit could convey up to 120 cfs of treated water at the head end of the Bray WTP via gravity flow to existing distribution facilities in the Shingle Springs and Cameron Park areas. The capacity of the conduit would decrease along the length of the pipeline as it is tapped by trunk lines.

Project Alternatives: GDPUD

The supplemental water supply needed by GDPUD probably will be used in the western service area, perhaps including areas to the southwest that are not now within the District service area, but are within its sphere of influence (See Figure 4).

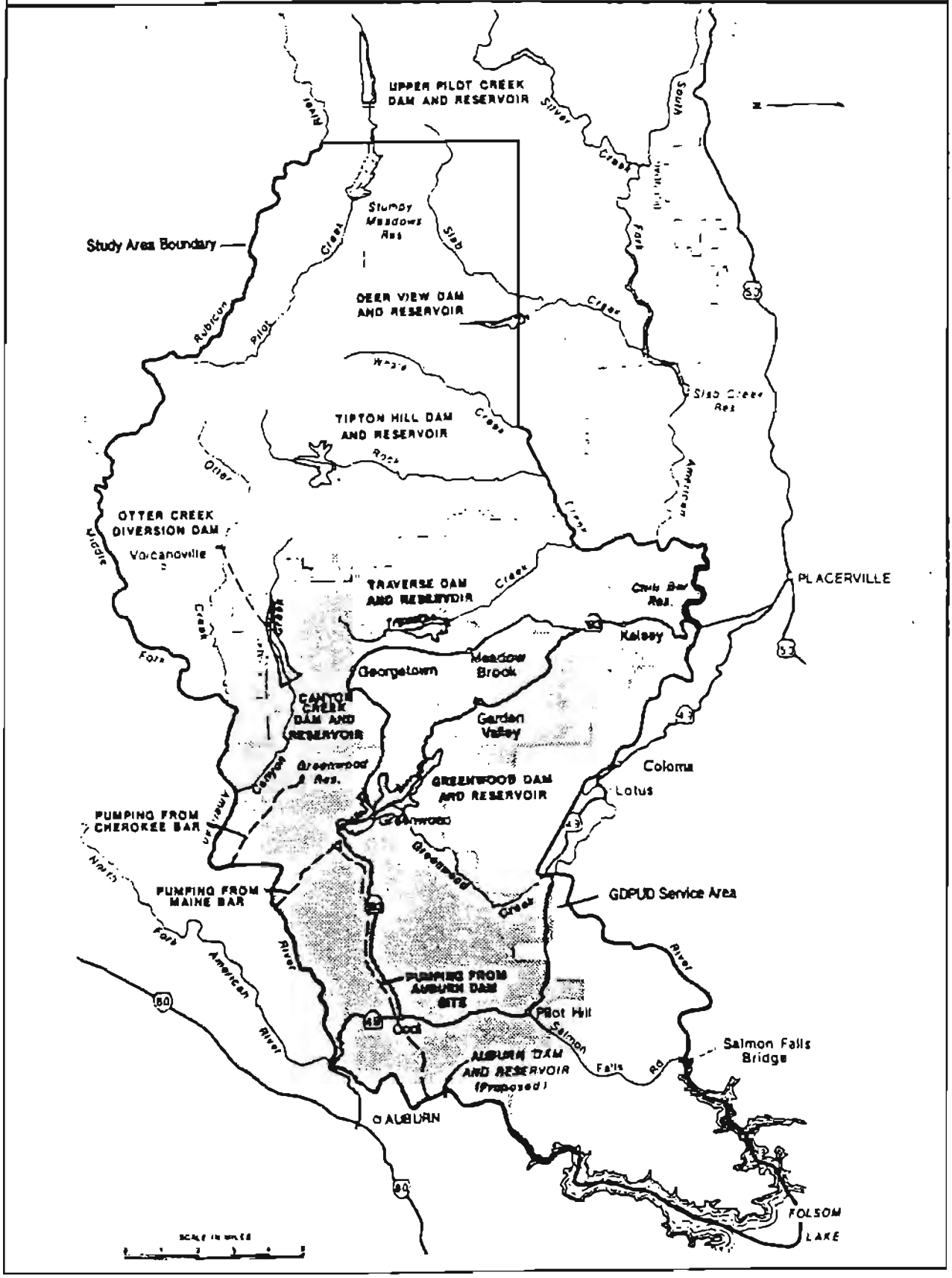
Storage Projects

Over the years, GDPUD has investigated a number of storage projects and sites to supplement its water supply. The Canyon Creek Project is by far the most feasible and acceptable storage project alternative identified.

Canyon Creek Project--The Canyon Creek Project would consist of a dam and reservoir on Canyon Creek with a drainage area of 12.5 square miles and an average annual flow of about 12,500 acre-feet (including regulatory releases from the GDPUD ditch system). The dam site is below the confluence with Dark Canyon Creek and would have a maximum water surface elevation of about 2,200 feet, with a reservoir capacity of 17,500 acre-feet. Reclamation, in "Georgetown Divide Unit--A Reconnaissance Appraisal of Ways to Develop Future Water Supplies" (1966), estimated a total yield of about 9,600 acre-feet.

Canyon Creek Dam would create a reservoir that would inundate 280 acres. It would be an earthfill structure with a crest length of 980 feet and a height of 216 feet.

Figure 6
MAJOR ALTERNATIVES REVIEWED



This project could serve by gravity the western portion of the GDPUD service area below elevations of about 2,000 feet, including Pilot Hill, Cool, and potential annexation areas to the south. About 1.4 miles of tunnel and 2.6 miles of pipeline (part of it in the tunnel) would be required. Additionally, surplus water from Otter Creek, Stumpy Meadows Reservoir (an existing project), and en route diversions could be easily handled in the existing GDPUD conveyance system for offstream storage at Canyon Creek and later use in the service area.

Water diverted from Otter Creek, an adjacent drainage, would be conveyed to Canyon Creek near Antwine Gulch. Approximate drainage area tributary to the Otter Creek Diversion Dam is 12.2 square miles. Otter Creek Diversion Dam would be a concrete gravity structure 25 feet high, with a crest length of 110 feet. The conveyance system from Otter Creek to Canyon Creek would consist of 5,000 feet of 48-inch diameter, reinforced concrete pressure pipe and a 7-foot diameter concrete-lined tunnel about 7,900 feet long. Conveyance capacity would be about 70 cubic feet per second.

Water would be conveyed from Canyon Creek Dam to the existing GDPUD conveyance and distribution system through 2.6 miles of pipeline and tunnel to a site above the Schroeder siphon north of Greenwood. This conveyance system would consist of 1.8 miles of 45-inch diameter pipeline and 0.8 miles of 42-inch diameter pipeline. The pipeline would go through a 6-foot diameter tunnel about 1.8 miles long.

Tipton Hill Project--The Tipton Hill Project site is at a remote location as compared to the GDPUD service area, but could serve the southeastern portion with a conduit system. Conveyance to the western portion is also possible by pumping into the existing conveyance system above the reservoir.

The reservoir has a drainage area of only about 6.9 square miles, but it could be developed to a storage capacity of about 15,000 acre-feet. Reclamation's analysis envisioned import from Slab Creek and Whaler Creek to develop a total yield of about 9,500 acre feet. The latter scenario would require a substantial conveyance system, including 8.9 miles of pipeline from Slab Creek to Tipton Hill and 9.2 miles of pipeline to the point where water could re-enter the District's system by gravity.

Tipton Hill reservoir could be used to store surplus water from the Stumpy Meadows Project and en route diversions, thereby augmenting natural flows from the tributary area. Although this alternative represents a good reservoir site, in a preliminary analysis it appears to be more expensive with fewer operational

advantages than the Canyon Creek Project.

Greenwood Project--The Greenwood Project would consist of a dam and reservoir on Greenwood Creek, with a drainage area of 9.9 square miles. The reservoir capacity would total about 42,000 acre-feet. Additional surplus water could be brought in from other locations. Reclamation estimated the yield of this project at 10,200 acre-feet. Development of this project would inundate an inhabited area near the community of Greenwood.

Traverse Creek Project--The Traverse Creek Project would consist of a dam and reservoir on Traverse Creek with a reservoir capacity of about 9,700 acre-feet. The drainage area is about 8.1 square miles, and since the site lies somewhat westerly on the divide, runoff is not as heavy as it is farther east at higher elevations. Traverse Creek could supply water to the Garden Valley area by gravity flow. Traverse Creek could also store surplus water from the Stumpy Meadows Project. The project normal water elevation would be about 2,300 feet, a lower elevation than much of the GDPUD service area. It is remote from most of the conveyance system and service area.

Deer View Project--The Deer View Project would consist of a dam and reservoir on Soapwood Creek near Deer View. The drainage area is only 1.0 square mile and the storage capacity it rather small at 3,800 acre-feet. The site is remote from the portion of the District service area in which major growth is projected.

Four alternative direct diversion projects have been identified by the Agency and GDPUD: (1) North Fork Pumping Project near River Mile 20.1, (2) South Fork Pumping Project near Lotus, (3) Middle Fork Pumping Project at Maine Bar, and (4) Middle Fork Pumping Project at Cherokee Bar. All four alternatives could provide a supplemental water supply to the western portion of the GDPUD service area by diverting water upstream of Folsom Reservoir. Substantial flows exist in all upstream reaches even in the summer months due to releases from upstream hydroelectric generation facilities. Permission to divert water at these points would have to be secured from the State Water Resources Control Board.

Diversion Projects

North Fork Pumping Project--This alternative would pump water from North Fork American River at a point just downstream of the proposed Auburn Dam and up Knickerbocker Canyon to a small reservoir and water treatment plant near Cool. About 1.5 miles of 24-inch pipeline and a pumping lift of 1,050 feet would be required to reach the small reservoir with an additional 1.2

miles of 24-inch pipeline required to tie into the existing system near Cool. Pumping lift could be reduced if Auburn Dam and Reservoir are built. The water treatment plant could be located either at the small reservoir or near Cool, depending on the amount of untreated water required in the system at that location. This system would serve District needs in the western portion of the service area south of Cool, including the area served by the South Fork Pumping Project near Lotus. Either the North Fork Pumping Plant or the South Fork Pumping Project could be built, but probably not both projects.

South Fork Pumping Project--This alternative would involve direct pumping from South Fork American River below the location of the United States Geological Survey gaging station near Lotus. Water would be pumped with a 200-foot lift through about 1.0 mile of 24-inch pipeline to a 50 acre-foot reservoir and water treatment plant. Treated water could be served to the peninsula area between the North Fork and South Fork American River, with most of the service area lying to the south of the diversion and reservoir. Additional pumping would be required to serve some portions of the intended service area, and water could be pumped back to the Cool-Pilot Hill area during critically dry seasons. This project is intended to serve an area within the sphere of influence, a substantial portion of which is outside of present District boundaries.

Middle Fork Pumping Project at Maine Bar--This alternative would involve direct pumping from Middle Fork American River near Maine Bar Canyon. A pumping lift of about 1,200 feet would be required to deliver the water to the existing Auburn Lake Trails WTP. Untreated water could be released directly to the Georgetown Divide Ditch. About 3 miles of 24-inch steel pipeline would be required with a peak flow of 23 cfs. The pumping site on the Middle Fork American River would be flooded if Auburn Dam is built.

Middle Fork Pumping Project at Cherokee Bar--Under this alternative, water would be pumped from Middle Fork American River near Cherokee Bar to GDPUD's existing Greenwood Reservoir. This would require a pumping lift of about 1,700 feet and could provide untreated water to both the Georgetown Divide Ditch and Auburn Lake Trails WTP. About 3 miles of 24-inch pipeline through very steep terrain would be required. The added pumping lift makes this site less attractive than Maine Bar. The pumping site on Middle Fork American River would be flooded if the Auburn Dam is built.

Focus of Draft Environmental Impact Report (EIR)

The EIR will evaluate potential environmental impacts resulting from project alternatives including, but not limited to, hydrology, water quality and fisheries; geology and soils; biological resources (vegetation and wildlife); land use and public policy consistency; growth inducement; recreation and aesthetics; transportation, air quality and noise; and cultural resources.

A no-project alternative will be included pursuant to the requirements of CEQA.

In general, those alternatives involving construction activities identified herein would result in the generation of ozone precursor emissions (SO^x and PM^{10}) during construction activities. This would constitute a direct significant and unavoidable impact under CEQA.

The alternatives identified herein also would result in significant and unavoidable growth-inducing and secondary impacts, including:

* substantial increase in population,
* conversion of land identified for its potential to support agricultural uses,
* conversion of vacant land and timberland to urban use,
* loss and degradation of existing vegetation and wildlife habitat, and
* increase in ozone precursor emissions.

The secondary impacts associated with growth induced by the alternatives identified herein include conversion of vacant land; increased traffic, air quality degradation, and noise; increased demand for public services; and habitat loss.

The dam and reservoir projects would narrow the range of beneficial uses of the environment if constructed as the beneficial uses of relatively natural stream systems would be replaced with reservoirs and regulated instream flows. Section 15126(e) of the State CEQA Guidelines requires that an EIR include a discussion of the relationship between local short-term uses of the environment and the maintenance and enhancement of long term productivity. The cumulative and long-term effects of the alternatives will be evaluated in the EIR.

Other potential effects resulting from construction-related alternatives could include slope instability, pipeline severance

from ground shaking, increased short-term and long-term soil erosion rates, and structural damage from development on expansive soils.

Section 15126(f) of the State CEQA Guidelines requires an EIR to include a discussion of significant irreversible environmental changes that would be involved in a proposed action, should it be implemented. Construction of any of the dam and reservoir project alternatives would constitute the largest irreversible commitment of nonrenewable resources. Constructing these projects would commit future generations to reservoir uses. In addition, nonrenewable resources would be involved in the construction of conveyance and distribution systems.

Section 15123(b) of the State CEQA Guidelines requires an EIR to identify known areas of controversy known to the lead agency, including issues raised by agencies and the public. Such areas of controversy identified at this time would include, but not be limited to, effects on public trust resources in the Lower American River (among other water courses) and the Sacramento-San Joaquin Delta and San Francisco Bay Estuary. The effects on these areas will be evaluated in the EIR. These effects could include changes in flows and flood flows, decreased flows, water quality degradation, reduced hydropower generation, and alteration of water temperature.

Potential effects on fisheries will be evaluated--particularly in light of species which have been declared threatened or endangered under federal and state laws. Potential effects include:

* reduced fish productivity in the Lower American River, lower Sacramento River, and Delta from reduced streamflow and reduced Delta outflow,
* acute and chronic toxicity of fisheries and reduced fish productivity as a result of decreased water quality,
* reduced fish productivity and loss of stream habitat at reservoir sites,
* reduced fish production, abundance, and distribution due to reservoir impoundments,
* reduced fish productivity and spawning success from fluctuating or low reservoir levels, and
* reduced fish productivity and spawning success from reduced instream flows due to project operations.

Potential effects on vegetation and wildlife include:

* loss of mature oaks and pines, disturbance and loss of

wildlife habitat,
* disturbance and loss of special-status plant populations,
* disturbance and loss of vegetation and wetland wildlife habitat,
* filling of jurisdictional waters of the United States,
* disturbance and loss of Valley Elderberry shrubs,
* loss of Layne's butterweed populations at the Texas Hill Project,
* changes in riparian vegetation below reservoir impoundments due to reduced flows,
* loss of northwestern pond turtle and red-legged frog at Texas Hill Project,
* loss of yellow warbler and yellow-breasted chat pairs and breeding habitat associated with the Texas Hill Project,
* loss of wooly violet populations and loss of mountain yellow-legged frog or foothill yellow-legged frog habitat at Small Alder Project,
* obstruction to deer migration, effects of reservoir impoundments on bald eagle, California spotted owl, northern goshawk, and osprey habitat, and effects of reservoir impoundments on Sierra Nevada red fox, Pacific fisher, marten, and California wolverine.

Potential effects on recreation and aesthetics include:

* reduced opportunities for white water rafting,
* degradation of visual quality (including alteration of views),
* effects on warm water fisheries and flat water boating at Folsom Reservoir,
* loss of wild trout fishery habitat and loss of dispersed camping areas at Small Alder Project.

Implementation of alternatives could have impacts on potentially important cultural resources, particularly with the construction of pipelines and dams, and due to reservoir impoundments.

Distribution List

A distribution list is being included in this notice to encourage those receiving the notice to identify an interested person or organization whose name does not appear on the list.

The list includes responsible agencies, trustee agencies, other federal, state and local agencies, and elected representatives that are known to the lead agency as having an

interest in the type of project or projects which will be the subject of the draft EIR.

A responsible agency is a public agency, other than the lead agency, that has discretionary approval of the project. Prior to acting on or approving a project, a responsible agency must consider the lead agency's EIR. Trustee agencies have jurisdiction over certain resources held in trust for the people of California. CEQA encourages public involvement through scoping, public notice and review of CEQA documents.

The distribution list for this Notice of Preparation is as follows:

Local Agencies

* Arcade Water District
* Arden-Cordova Water District
* Buckeye Union School District
* California State Water Project Contractors Association
* Cameron Park Community Services District
* Carmichael Water District
* Citizens Utilities Company of California
* Citrus Heights Irrigation District
* City of Folsom, City Manager
* City of Folsom, Department of Planning
* City of Galt, City Manager
* City of Galt, Department of Planning
* City of Placerville, City Manager
* City of Placerville, Department of Planning
* City of Roseville, City Manager
* City of Roseville, Department of Planning
* City of Sacramento, City Manager
* City of Sacramento, Department of Planning
* Clay Water District
* County of Placer, Board of Supervisors
* County of Placer, Chief Administrative Officer
* County of Placer, Department of Planning
* County of Sacramento, Board of Supervisors
* County of Sacramento, Chief Administrative Officer
* County of Sacramento, Department of Planning
* Del Paso Manor Water
* Diamond Springs Fire Protection District
* East Bay Municipal Utility District
* El Dorado County Air Pollution Control District
* El Dorado County Farm Advisor
* El Dorado County, Department of Planning
* El Dorado County, Department of Transportation
* El Dorado County Fire Protection District

* El Dorado County Resource Conservation District
* El Dorado County Sheriff's Department
* El Dorado County Superintendent of Schools Office
* El Dorado Hills Community Services District
* El Dorado Irrigation District
* El Dorado Union High School District
* Elk Grove Water Works
* Fair Oaks Water District
* Florin County Water District
* Fruitridge Vista Water Company
* Galt Irrigation District
* Georgetown Divide Public Utility District
* Georgetown Divide Resource Conservation District
* Metro Airport Public Water District
* Mother Lode Union School District
* Natomas Mutual Water Company
* Northridge Water District
* Omuchumnes-Hartnell Water District
* Orangevale Mutual Water Company
* Placer County Water Agency
* Placerville Union School District
* Rancho Murieta Community Services District
* Rescue Union School District
* Rio Linda Water District
* Sacramento Area Council of Governments
* Sacramento Area Flood Control Agency
* Sacramento Municipal Utility District
* Sacramento Metropolitan Water Authority
* San Juan Suburban Water District
* Tokay Park Water Company

State Agencies

* California Air Resources Board
* California Department of Boating and Waterways
* California Department of Conservation
* California Department of Fish and Game
* California Department of Forestry and Fire Protection
* California Department of Health Services, Office of Drinking Water
* California Department of Parks and Recreation
* California Department of Real Estate
* California Department of Transportation
* California Department of Water Resources
* California Environmental Protection Agency
* California Integrated Waste Management Board
* California Office of Historic Preservation
* California Public Utilities Commission
* California State Lands Commission

* Central Valley Regional Water Quality Control Board
* Native American Heritage Commission
* State Office of Planning and Research, State Clearinghouse
* State Reclamation Board
* State Water Resources Control Board

Federal Agencies

* Advisory Council on Historic Preservation
* National Marine Fisheries Service, Santa Rosa
* U.S. Army Corps of Engineers, District Engineer
* U.S. Bureau of Reclamation, Regional Director
* U.S. Department of Agriculture, Soil Conservation Service
* U.S. Department of the Interior
* U.S. Environmental Protection Agency, Region IX
* U.S. Fish and Wildlife Service, Sacramento
* U.S. Forest Service, Eldorado National Forest
* U.S. Geological Survey
* Western Area Power Administration

Special Interest Groups and Other Organizations

* American Fisheries Society
* American River Coalition
* American River Natural History Association
* American River Parkway Foundation, Inc.
* American River Recreation Association
* American River Land Trust
* Association of California Water Agencies
* Audubon Society
* Bay Institute of San Francisco
* California Canoe and Kayak
* California Farm Bureau Federation
* California Farm Water Coalition
* California Fly Fishermen Unlimited
* California Heritage Council
* California League of Conservation Voters
* California Native Plant Society
* California Outdoors
* California Sportfishing Protection Alliance
* California Striped Bass Association
* California Trout
* California Waterfowl Association
* California Water Resources Association
* California Valley Fisheries Coalition
* Central Valley Project Water Association
* Citizens for a Better Environment

* Defenders of Wildlife
* Ducks Unlimited
* EID Water Users Association
* El Dorado Business Alliance
* El Dorado County Association of Realtors, Inc.
* El Dorado County Economic Development Corporation
* El Dorado Forum
* El Dorado Surveyors, Architects, Geologists & Engineers
* Environmental Council of Sacramento
* Environmental Defense Fund
* Folsom Lake Marina
* Friends of the River
* National Wildlife Federation
* Natural Heritage Institute
* Natural Resources Defense Council
* Northern California Council Federation of Fly Fishers
* Pacific Coast Federation of Fisherman's Associations
* Pacific Gas & Electric Company, Placerville District
* Planning and Conservation League
* Protect American River Canyons
* Sacramento River Council
* Sacramento River Preservation Trust
* Save San Francisco Bay Association
* Save the American River Association
* Sierra Club, Maidu Chapter
* Sierra Club, Mother Lode Chapter
* The Wilderness Society
* United Anglers of California

Elected Representatives:

* Honorable Barbara Boxer
* Honorable Dianne Feinstein
* Honorable Bill Baker
* Honorable Ronald V. Dellums
* Honorable John Doolittle
* Honorable Vic Fazio
* Honorable Dan Hamburg
* Honorable Robert T. Matsui
* Honorable George Miller
* Honorable Tom Lantos
* Honorable Nancy Pelosi
* Honorable Richard Pombo
* Honorable Fortney Stark
* Honorable Lynn Woolsey
* Honorable Dan Boatwright
* Honorable Leroy F. Greene
* Honorable Patrick Johnston
* Honorable Quentin L. Kopp

* Honorable Tim Leslie
* Honorable Bill Lockyer
* Honorable Milton Marks
* Honorable Nicholas C. Petris
* Honorable Mike Thompson
* Honorable Dean Andal
* Honorable Thomas H. Bates
* Honorable Larry Bowler
* Honorable Vivien Bronshvag
* Honorable Valerie Brown
* Honorable Willie L. Brown, Jr.
* Honorable John Burton
* Honorable Robert J. Campbell
* Honorable Thomas M. Hannigan
* Honorable Phillip Isenberg
* Honorable David Knowles
* Honorable Barbara Lee
* Honorable Richard Rainey

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ATTACHMENT A
NOTICE OF INTENT AND NOTICE OF PREPARATION

Bureau of Reclamation

Proposed Water Service Contract, El Dorado County, California

AGENCY: Bureau of Reclamation (Interior).

ACTION: Notice of intent to prepare a draft environmental impact statement/environmental impact report and notice of scoping meetings for proposed water service contracts to El Dorado County Water Agency from the Central Valley Project, California.

SUMMARY: Pursuant to Public Law 101–514 (104 Stat. 2087), Section 102(2)(C) of the National Environmental Policy Act (NEPA) of 1969, as amended, and section 21002 of the California Environmental Quality Act (CEQA), the Bureau of Reclamation (Reclamation) and El Dorado County Water Agency (Agency) intended to prepare a joint environmental impact statement/environmental impact report (EIS/EIR) for a water service contract from the Central Valley Project, California.

The proposed project consists of a water supply contract for El Dorado County Water Agency. The El Dorado County Water Agency has entered into discussions with Reclamation to negotiate long-term water supply contracts from the American River Division, Central Valley Project (CVP).

DATES: Comments are requested concerning the scope of analysis of the draft EIS/EIR. Input concerning issues related to the proposed water service contract should be received by June 11, 1993. Two public scoping meetings for this project will be held: Date: Wednesday, May 26, 1993. Times: 3 p.m. and 7 p.m.

ADDRESSES: Location of meetings: El Dorado County Board of Supervisors Chambers, 330 Fair Lane, Placerville, California.

FOR FURTHER INFORMATION CONTACT: Please address scoping comments or information requests to Robert J. Reeb, General Manager, El Dorado County Water Agency, 330 Fair Lane, Placerville, CA 95667, telephone: (916) 621–5392. Reclamation's environmental representative is James Frederick, Environmental Specialist, Bureau of Reclamation, Mid-Pacific Region, 2800 Cottage Way, Sacramento, CA 95825–1898, telephone: (916) 978–5134.

SUPPLEMENTARY INFORMATION: The contract to be negotiated has been authorized and directed by the United States Congress as part of Public Law 101–514. This contract has been excluded from the prohibition on new contracting found in Public Law 102–575.

Public Law 101–514 directs the Secretary of the Interior (Secretary) to enter into long-term municipal and industrial water supply contracts to meet the immediate water needs of El Dorado and Sacramento Counties. The law directs the Secretary to enter into contracts for up to 22,000 acre-feet annually with Sacramento County, 13,000 acre-feet annually with San Juan Suburban Water District, and 15,000 acre-feet annually with El Dorado County Water Agency. These water service contracts are intended as the first phase of a contracting program to meet the long-term water supply needs of El Dorado and Sacramento Counties.

El Dorado County Water Agency water service contract is not part of the Sacramento County water service contract project. Sacramento County Water Agency and San Juan Suburban Water District have initiated negotiations with Reclamation on a water service contract under Public Law 101–514, and they are preparing NEPA/CEQA environmental documentation under a separate notice of intent.

El Dorado County is currently considering plans for long-term water supplies. An environmental impact report (EIR) has been prepared which analyzes several combinations of actions designed to satisfy the county's long-term water needs. One element of several proposed alternatives is the water service contract with Reclamation. The element is the Folsom Reservoir Water Supply Contract. Folsom Reservoir water would be used in the western service area, which includes the most urbanized areas of the county. It is proposed that the contract water would be diverted at Folsom Reservoir or upstream from the American River or its tributaries.

The EIS/EIR will focus on impacts to the physical environment from diversion, distribution, and use of the contracted water. The documentation will include analysis of the potential impacts to the natural environment, i.e., aquatic, wetland, and riparian communities, including any effect on special status species. Secondary growth impacts associated with the water delivery and secondary impacts associated with the construction of water delivery facilities used to divert, treat, and distribute Folsom Reservoir water will be investigated.

The draft EIS/EIR is expected to be completed and available for review and comment in the winter of 1994–95.

Scoping

One element of the EIS/EIR process is scoping. Scoping activities are initiated early in the process: to identify reasonable alternatives that should be evaluated in the draft EIS/EIR, to identify significant environmental issues related to the proposed projects, to determine the depth of analysis for issues addressed in the documentation, and to identify resource issues that are not important and that do not require detailed study. Scoping meetings have been scheduled to solicit public input to help identify issues and possible alternative actions within the framework for delivery and use of the contracted water.

Note: Disabled persons requiring special services, should contact Reclamation's Equal Employment Office at (916) 978–4911. Please notify this office as far in advance of the meetings as possible, and no later than May 21, 1993, to enable Reclamation to secure the needed services. If a request cannot be honored, the requester will be notified. A telephone device for the hearing impaired (TDD) is not available.

Dated: May 7, 1993.

Joe D. Hall,

Deputy Commissioner

[FR Doc. 93–11315 Filed 5–11–93; 8:45 am]

BILLING CODE 4310–09–M

Fish and Wildlife Service

Endangered and Threatened Species; Policy on Candidate Categories Relative to Petition Findings

AGENCY: Fish and Wildlife Service, Interior.

ACTION: Notice.

SUMMARY: Under the Endangered Species Act of 1973 (Act), as amended, the Fish and Wildlife Service (Service) evaluates petitions for listing animal and plant species. Within 1 year after receiving a listing petition (if substantial information is presented), the Service is required under the Act to make one of the following findings on the merits of the petition: "warranted," "not warranted," or "warranted but precluded." The Service has a separate, but related, administrative process to identify candidate species for listing under the Act. These two processes have not been formally linked in the past. This notice states the Service's current policy regarding the treatment of petition findings relative to the candidate categorization process.

DATES: The policy announced in this notice has been in effect since December 15, 1992.

ADDRESSES: Please send any correspondence concerning this notice to the Director (AES), Mail Stop 3024, U.S. Fish and Wildlife Service, Washington, DC 20240.

1 - Daniel Witter, EIO
1 - Chuck Burau, GDPUO

ATTACHMENT B
USEPA AND CDFG RESPONSES
TO
NOTICE OF INTENT AND NOTICE OF PREPARATION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

Roger K. Patterson
Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way
Sacramento, CA 95825-1898

Robert J. Reeb
General Manager
El Dorado County Water Agency
330 Fair Lane
Placerville, CA 95667

Dear Mr. Patterson and Mr. Reeb:

The Environmental Protection Agency (EPA) has reviewed the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the project entitled Proposed Water Service Contract, El Dorado County, California. Our review is provided pursuant to the National Environmental Policy Act (NEPA) [42 USC 4231 et seq.], Council on Environmental Quality (CEQ) regulations [40 CFR Parts 1500-1508] and Section 309 of the Clean Air Act.

The proposed project consists of a water supply contract for El Dorado County Water Agency (Agency) which has entered into discussions with the U.S. Bureau of Reclamation to negotiate long-term water supply contracts from the American River Division, Central Valley Project. Public Law 101-514 directs the Secretary of the Interior to enter into long term municipal and industrial water supply contracts with El Dorado County for up to 15,000 acre feet annually. It is proposed that the contract water would be diverted at the Folsom Reservoir or upstream from the American River or its tributaries.

In defining the project purpose, we recommend that the EIS include options to meet future water supply demands by analyzing alternatives to acquiring contract rights to additional water. The EIS should take into account those limitations on the availability of diversions from the American River given passage of the Central Valley Project Improvement Act and the existence of the Public Trust resources in the American River and the San Francisco Bay-Sacramento San Joaquin Delta Estuary. Given these limitations the EIS should discuss and assess the alternatives

GEN. MGR. RC
W.R. ENGR. TC

regarding points of diversion and in-stream flow requirements of the American and Sacramento Rivers. The EIS should also set out in extensive detail the required water conservation plans for the District, water pricing strategies, and water reclamation opportunities.

We look forward to working with the Bureau of Reclamation and the El Dorado County Water Agency and appreciate the opportunity to review and provide comments on this scoping for the preparation of an environmental impact statement. Please send three copies of the Draft Environmental Impact Statement to this office at the same time it is officially filed with our Washington, DC office. If you have any questions, please feel free to contact me at (415) 744-1584, or have your staff contact Edward Yates at (415) 744-1571.

Sincerely,

Jacqueline Wyland, Chief
Office of Federal Activities

Enclosures: 3
MI #: 1911 ELDO.NOI

cc: Kirk Rodgers, USBR, Water Policy and Allocation Office

GENERAL COMMENTS

Statutory Background

Authorization for this project is set out in Section 206(b)(1)(B) of Public Law 101-514 which directs the Secretary of the Interior to enter into long term municipal and industrial water supply contracts with El Dorado County. These water contracts are for up to 15,000 acre feet annually "considering reasonable efforts to ensure water conservation programs within areas to be served by the contracts." This project must take into account the consultation requirements set out in the Endangered Species Act [16 USC 1531 et seq.] (ESA). This project must also conform to the requirements of the Central Valley Improvement Act (Public Law 102-545) (hereinafter Improvement Act) and the Reclamation Reform Act (Public Law 97-293) which set out standards and criteria for water quality, metering, and conservation, environmental review. These requirements are detailed below. [All code citations refer to sections of the Improvement Act, unless otherwise noted.]

The Bureau of Reclamation is also required to draft a Programmatic Environmental Impact Statement (EIS) for the entire Central Valley Project [§3409] . This process will probably not be completed until well after the El Dorado Water Service Contract EIS has been completed. The Bureau of Reclamation should, therefore, reserve the option of reopening certain contract terms of the El Dorado project in order to meet its statutory mandates under the Improvement Act.

Purpose and Need for the Project

When specifying the purpose and need of the proposed action [40 C.F.R. § 1502.13], we recommend that the project purpose specify the current water supplies and the projected demand for additional water sources. These projections should set out the various projections given different levels of water conservation and pricing described below. This section should also point out the environmental purposes for American River water that have been established by the Improvement Act. Section 3406(b)2) of the Improvement Act requires the Secretary of the Interior to dedicate annually 800,000 acre-feet of Central Valley Project (CVP) yield for the restoration of fish, wildlife and habitat and to protect the waters of the San Francisco Bay-Sacramento/San Joaquin Delta Estuary (Bay-Delta).

Further, the Environmental Impact Statement (EIS) should recognize both the specific project purpose and the broader environmental purposes set out in the Improvement Act and other

laws such as the Endangered Species Act. Any quantity of water for the project should be explicitly conditioned on availability of water after meeting environmental purposes. The EIS should identify these purposes/requirements and demonstrate how they will be implemented. In assessing alternatives, the EIS should present a range of actions that are directed toward satisfying project purposes and objectives.

Alternatives Analysis

When evaluating all reasonable alternatives and discussing reasons for eliminating other alternatives [40 C.F.R. § 1502.14], we recommend that project sponsors consider a combination of alternatives in addition to those stated in the Notice of Preparation for this EIS. A combination alternative could include water conservation, water reclamation, water transfers and water pricing. The EIS should also include the "No Action" alternative as required by the CEQ regulations [40 CFR 1502.14(d)]. A no action alternative could describe the above mentioned combinations without any additional water contracting.

Water Conservation. Section 210(b) of the Reclamation Reform Act requires each water district that has entered a water service contract to develop a water conservation plan which shall contain "definite goals, appropriate water conservation measures, and a time schedule for meeting the water conservation objectives." Section 3405 of the Improvement Act directs the Bureau of Reclamation to establish criteria for evaluating the adequacy of these water conservation plans. The Bureau has issued such criteria (April 30, 1993) and has recently finalized this criteria in a Guidebook issued June 1, 1993. The EIS should demonstrate how El Dorado County is complying with the requirements in these guidance documents that are applicable to El Dorado.

The EIS should also use the enclosed guidelines for water conservation, "Best Management Practices," (BMPs) issued by the California Urban Water Conservation Council [Memorandum of Understanding Regarding Urban Water Conservation in California, September, 1991]. The EIS should also expand on these BMPS where appropriate, e.g. design requirements for new development, water reclamation, use of conserved water.

Section 3405(b) requires that any new water contract for CVP water must include a requirement that all water delivery systems within the recipient district must be equipped with water measuring "devices or methods" within 5 years of the contract or amendment. The EIS should address this requirement by describing El Dorado's plans to institute metering.

Water Transfers. Section 3405(a) provides the authority for California water agencies to use water transfers as alternatives to new contracts or supplies. The EIS should examine the opportunities for water transfers especially those in the same or adjacent watersheds such as Placer County.

Water Price Tiering. Section 3405(d) sets out a system of tiered pricing whereby prices shall increase in relation to water use. These price tiering standards are minimum requirements. The EIS should discuss in detail how more extensive price tiering (i.e. that which goes beyond the minimal requirements of the Improvement Act) can be used to further encourage water conservation and reduce dependence on contracted water.

Point of Diversion. Section 206(b)1)(B) of Public Law 101-514 states that the water supply contract may come from Folsom Lake or for exchange upstream on the American River or its tributaries. The EIS should describe the reasonable range of alternatives regarding possible points of diversion given this statute and given downstream flow requirements in the American River. Such instream flow requirements were established in Environmental Defense Fund v. East Bay Municipal Utility District, Civ. No. 425955 (Alameda Sup. Ct., Jan. 2, 1990) (EBMUD). The court stated in EBMUD that, "The court intends that instream flow requirements be an absolute limit on EBMUD's ability to divert water from the Folsom South Canal. When the instream flow requirements cannot be met, EBMUD may not divert any part of its appropriation."[Id. at 109-110.] The El Dorado EIS should address these limitations and those imposed by the Improvement Act and ESA and demonstrate how those limitations will be complied with.

Other Comments

The DEIS should cite specific documents and page numbers for documents incorporated by reference, and briefly describe the contents of the referenced material. The project sponsor should ensure that referenced materials are reasonably available for inspection. [40 C.F.R. § 1502.21]

DESCRIPTION OF THE ENVIRONMENT/ENVIRONMENTAL CONSEQUENCES

Direct, Indirect and Cumulative Impacts

The DEIS should discuss direct, indirect and cumulative effects of the proposed action. Indirect impacts [40 CFR 1502.16] include growth inducement. Discussion of growth inducing effects [40 CFR 1508.8] should include discussion of 1) the increases in air and water pollution, soil-related problems

(e.g. soil erosion or groundwater contamination), and habitat loss resulting from possible commercial and residential development induced by new water supplies and 2) the additional fiscal resources that will be required to protect air and water quality, reduce water demand, avoid significant impacts on wildlife habitat and wetlands, etc.

Cumulative impacts result from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions, regardless of what agency undertakes the action [40 C.F.R. § 1508.7]. Cumulative impacts include both temporal impacts - those impacts of related or nearby development that will reasonably occur in the future and "spatial" impacts - those impacts that will combine with other unrelated or geographically removed actions that will be expected if the individual impacts are allowed to accumulate. For instance, energy facilities established to distribute water may combine with both urban development spurred by additional water supplies and increased recreational use of the El Dorado National Forest to degrade air quality. Or, where project impacts combine with other water resource projects to increase water quality, such impacts must be assessed cumulatively. [U.S. v. 227 Acres of Land, 760 F2d 345 (S. Dist. NY 1991)].

Water Quality and Water Dependent Resources

Water Quality. CEQ regulations require that EISs include discussion of the "Natural and depletable resource requirements and conservation potential of various alternatives and mitigation measures." [40 CFR 1502.17(f)]. The EIS should, therefore, identify existing and potential designated uses[1] and the applicable water quality standards for the American River drainage. This section should also describe requirements for providing higher freshwater flows in the American River to enhance water quality for support of designated uses propagation of anadromous fisheries, and increased wildlife refuge water supplies. The EIS should include a detailed description of existing and baseline conditions and deficiencies in these conditions in regard to any impacts affecting the Bay-Delta. Guidelines issued by the EPA, Department of Commerce and Department of Interior for determining such baseline conditions are enclosed [Guidelines for Determining Sacramento-San Joaquin Delta Baseline Conditions].

[1] To avoid confusion with the phrase "beneficial uses" in Reclamation law, water uses protected pursuant to federal (e.g. Clean Water Act, §303) and state water quality laws are here called "designated uses."

The EIS should acknowledge that standards for the Bay/Delta are being reassessed and may be revised because designated uses are not adequately protected by existing standards. We recommend that the EIS: 1) discuss requirements pursuant to the Clean Water Act to meet revised water quality standards and protect designated uses; and 2) explain any current legal or policy constraints to complying with these standards.

Federal agencies must comply with the federal consistency requirements of the State's Nonpoint Source Management Program [Clean Water Act, §§ 319(b)(2)(F), 319(k)]. The EIS should identify potential sources of nonpoint pollution from building and operating the proposed action. Such sources may include, but not be limited to, sediment, heavy metals and herbicides.

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The EIS should thoroughly describe and map drainage patterns and riparian areas in the proposed project area. The EIS should identify the resources at risk such as wetlands, and fisheries habitat, especially spawning and rearing areas. For instance, springtime increases in water temperature in the Bay/Delta exist. Any exacerbation of this warming should be examined:[2] The EIS

[2] For background information please see CDFG [WRINT DFG-8] and USFWS [WRINT-USFWS-8] testimony in the State Water Resources Control Board Bay-Delta Proceedings, 1992; CDFG 1986 Instream Flow Requirements for the Lower American River, Sacramento County

should include copies of correspondence with NMFS and FWS and listings of species that could occur in the project area or be affected by the project.

The Central Valley Project has caused severe detrimental impacts on fisheries in the American River watershed. Construction and operation of water storage and delivery facilities has contributed to the loss of over 90% of the historical spawning habitat of anadromous fishes [DFG's California Fish and Wildlife Plan, 1965]. The EIS should identify the relevant mitigation measures set out in §3406(b) of the Improvement Act and assess how the project will not conflict with these measures.

Dredge and Fill. In regard to any fill activities that may occur the EIS should: identify whether the project will cause or contribute to significant degradation of the waters of the United States and should demonstrate how the proposed action will comply with the guidelines promulgated pursuant to Section 404(b)(1) of the Clean Water Act [40 C.F.R. Part 230]. In particular, the EIS should:

a. demonstrate that the project sponsors have selected the least damaging practicable alternative based on costs, logistics and existing technology with respect to waters of the United States. [40 C.F.R. § 230.10(a)].

b. describe how the project sponsors will avoid, minimize and mitigate the potential impacts of implementing each of the alternatives. (See MoA between EPA and the Army concerning the determination of mitigation under the Clean Water Act Section 404(b)(1) Guidelines from which pertinent information may be drawn.) For impacts that are unavoidable, the EIS should include detailed mitigation, including specific site plans and propose a mitigation ratio. It should not propose use of offsite waters or wetlands for mitigation.

c. demonstrate that implementing the action will not jeopardize the existence of species listed as endangered or threatened under the Endangered Species Act of 1973 or result in the destruction or adverse modification of a habitat which is "critical habitat" under said law.

d. discuss how the impacts of the proposed action may contribute to cumulative losses of waters of the United States in the area.

Stream Evaluation, NO. 86-1.

Hazardous Substances

The EIS should specify whether any hazardous substances, such as petroleum products and pesticides, will be used/ generated as a result of implementing the proposed action. If the project sponsors expect to use hazardous substances (40 C.F.R. § 302.4) in conjunction with the proposed action, the EIS should discuss how the project sponsors will protect against spills in compliance with the requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the methods that will be used to clean-up and dispose of spills/wastes in compliance with the Resource Conservation and Recovery Act (RCRA) regulations found at 40 C.F.R. § 260 to 268.

Air Quality

As mentioned above in the Direct, Indirect and Cumulative impacts section above the EIS should assess any growth inducing impacts, including residential, commercial and industrial development which may result in degradation of air quality. The EIS should:

1. Discuss whether the project area is designated a nonattainment area and if so then it should identify the particular pollutant(s), the degree of nonattainment and the levels of violations of state and federal standards.

2. Include relative state and federal statutory requirements for air quality plans and discuss current planning efforts to revise any of those plans.

3. Identify PSD Class I Areas (i.e., wilderness areas, National Parks, e.g. Desolation Wilderness Area), which receive special protection for particulates, SO_2, NO_x.

4. Identify areas with special visibility value or protection.

STATE OF CALIFORNIA—THE RESOURCES AGENCY PETE WILSON, Governor

DEPARTMENT OF FISH AND GAME
REGION 2
1701 NIMBUS ROAD, SUITE A
RANCHO CORDOVA, CA 95670
(916) 355-7020

June 9, 1992

Mr. Robert Reeb, General Manager
El Dorado County Water Agency
330 Fair Lane
Placerville, California 95667

Dear Mr. Reeb:

The Department of Fish and Game (DFG) has reviewed your Notice of Preparation of a Draft Environmental Impact Report (EIR) for the El Dorado County Water Agency (EDCWA) Central Valley Project Water Service Contract (SCH# 93052016). The proposed project consists of a water service contract with the EDCWA for use within the service areas of the El Dorado Irrigation District (EID) and Georgetown Divide Public Utility District (GDPUD) in the County of El Dorado. The EDCWA as authorized and directed by Congress as part of Public Law 101-514 has entered into discussions with the United States Bureau of Reclamation (USBR) to negotiate a long-term water service contract for 15,000 acre-feet (af) from the Central Valley Project.

The proposed project consists of several alternatives to meet the projected water demands of EID and GDPUD. The alternatives for meeting EID's water demand are: Texas Hill Reservoir Project (Storage), Small Alder Project (Storage), Folsom Reservoir (Direct Diversion), and the White Rock Project (Direct Diversion). The alternatives for meeting GDPUD's water demand are: Canyon Creek/Otter Creek Project (Storage), Tipton Hill Project (Storage), Greenwood Project (Storage), Traverse Creek Project (Storage), Deer View Project (Storage), North Fork Pumping Project (Direct Diversion), South Fork Pumping Project (Direct Diversion), Middle Fork Pumping Project at Maine Bar (Direct Diversion), and the Middle Fork Pumping Project at Cherokee Bar (Direct Diversion). Based upon the proposed project descriptions, the DFG has the following comments and concerns for inclusion in the draft EIR.

Fisheries Resources

The DFG will require a detailed study of historical surface water hydrology and how this will be affected by the different projects. The hydrologic analysis must include a 20-year hydrograph (DFG approved synthesized hydrograph is acceptable)

GEN. MGR. B
W.R. ENGR. M

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JUN 14 1993
EL DORADO COUNTY WATER AGENCY

1- Jim Frederick, USBR
1- David Witter, EID
1- Chuck Duraw, GDPUD
1- Stuart Somach, DeCuir & Somach
1- Jim Roberts, Global Envir.
1- County Counsel / Sam Bucham
Tom Parker

for affected stream reaches. Inventories must be conducted on current abundance and distribution of native and introduced fishery resources, and how the different aspects of the projects may impact them. DFG will require that instream flow studies be conducted using the U.S. Fish and Wildlife Service's (USFWS) Instream Flow Incremental Methodology (IFIM) with species preference curves developed for the American River (or DFG approved suitable proximate drainage basins) to model fish (all species and lifestages) and fish food (aquatic macroinvertebrates) habitat for pre- and post-project streamflows within the scope of the projects. The studies should also address impacts of the timing of water deliveries upon aquatic resources. Specifically, the Texas Hill Reservoir Project (Storage), Small Alder Project (Storage), White Rock Project (Direct Diversion), Canyon Creek/Otter Creek Project (Storage), Tipton Hill Project (Storage), Greenwood Project (Storage), Traverse Creek Project (Storage), Deer View Project (Storage), North Fork Pumping Project (Direct Diversion), South Fork Pumping Project (Direct Diversion), Middle Fork Pumping Project at Maine Bar (Direct Diversion), and the Middle Fork Pumping Project at Cherokee Bar (Direct Diversion).

The draft EIR should also evaluate the impacts of changing flow regimes and minimum pool storage (Folsom Reservoir) upon temperature and water quality in Folsom Reservoir and reaches downstream of proposed reservoirs and diversions. The USFWS Stream Network Temperature Model (SNTEMP) should be used to model existing and post-project conditions, including temperature changes from modifications of flow regimes and impacts to riparian habitats.

The DFG recommends that the studies be conducted to determine flow regimes necessary for channel maintenance in the stream reaches affected by the proposed storage and diversion projects. Your studies should also identify project hazards to fishery resources. All diversions will need to be screened as per DFG screening criteria, to prevent the entrainment of fish (juveniles and adults) into the storage/conveyance system.

Construction of reservoirs or diversions on Weber Creek, Alder Creek, Canyon Creek, Otter Creek, Rock Creek, Whaler Creek, Greenwood Creek, Traverse Creek, and Soapwood Creek, Slab Creek, North Fork, Middle Fork, and South Fork would result in a loss of stream and riparian habitat. An analysis should be made of project construction and operation impacts to stream water quality. An erosion control plan with specific, detailed measures should be included. Your environmental analysis of project options should lead to selection of the option that ensures thriving trout and native nongame fishes in waters within the scope of the projects.

The proposed projects may impact water quality, flow regimes, and fisheries in the lower American River, Sacramento-San Joaquin Delta, and San Francisco Bay Estuary therefore, your analysis must address these issues. Consultation with the USFWS, U.S. Environmental Protection Agency, National Marine Fisheries Service, State Water Resources Control Board, and DFG is recommended to ensure adequate protection of these ecosystems.

Wildlife Resources

The EIR should discuss and mitigate the proposed projects direct and indirect impacts upon wildlife. Vegetation mapping for all wildlife habitat in the project area should be prepared. The document should examine how proposed project features may impact wildlife. We recommend (except for rare, threatened, and endangered plants and animals) the Habitat Evaluation Procedures method developed by the USFWS be used to quantify these impacts, and to evaluate and develop proposed mitigation that would offset these impacts. Studies should also be conducted to determine the extent of winter and resident deer ranges that would be impacted by the proposed project alternatives.

Wetland Habitat

Eighty-nine percent of riparian woodland and 94 percent of interior wetlands have been lost or altered since the 1800's. These losses have resulted in the DFG's no net loss of wetlands habitat policy. The analysis of the project alternatives should address mitigation of stream or river habitat and all wetland habitat lost to reservoir or diversion impoundments or other project features based upon the concept of no net loss of wetland habitat value and acreage.

Threatened and Endangered Species

The EIR should evaluate and mitigate the proposed projects direct and indirect impact upon State- and Federally-listed rare, threatened, endangered species, candidate species, and Species of Special Concern. The report should include a search of the DFG's Natural Diversity Data Base, information from U.S. Forest Service files, as well as field surveys for the presence of potential candidate, Species of Special Concern, rare, threatened, and endangered species within the vicinity of the proposed projects and their service areas. Surveys should be performed by qualified biologists who are experienced with appropriate survey methods and timing. The report should address how the proposed projects may impact these sensitive species within the vicinity and develop mitigation measures to offset identified impacts. If adverse impacts to State- or Federally-listed candidate, species of special concern, rare, threatened, or endangered species are

identified, consultation with the USFWS and DFG should be initiated.

Recreation

The EIR should address the projects and alternatives impacts upon consumptive and nonconsumptive fish and wildlife users. Recreational cost/benefit analysis should incorporate economic considerations.

Cumulative Impacts

The American River watershed is already highly developed for hydropower, flood control, irrigation, and domestic water supply. The DFG is concerned that the proposed projects and alternatives may have cumulative impacts to the American River Basin and recommends that the EIR address these problems. A cost/benefit analysis of project options should be included. Evaluation of project alternatives should also include conservation measures as part of the no project option.

Growth Inducing Impacts

Growth Inducing Impacts resulting from the proposed water development should be addressed. These proposed projects will induce growth, thereby further reducing available habitat for wildlife and sensitive plant species. The DFG suggests a Habitat Management Plan be examined to offset the impacts to fish and wildlife habitats resulting from growth in the service areas.

In order to comply with Public Resources Code Section 21081.6, a detailed monitoring program must be developed for all required mitigation conditions. The monitoring program should include the following:

a. Specific criteria to measure effectiveness of mitigation

b. Annual monitoring for a minimum of five years. Annual written reports submitted to the lead agency and the DFG.

c. Annual monitoring reports, each of which include corrective recommendations that shall be implemented in order to ensure that mitigation efforts are successful.

The proposed projects and alternatives will have an impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project

applicant upon filing of the Notice of Determination by the lead agency.

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

The applicant should be advised that work within the 100-year flood plain consisting of but not limited to, diversion or obstruction of the natural flow or changes in the channel, bed, or bank of any river, stream, or lake will require notification to DFG as required by Fish and Game Code Section 1600 et seq. The notification (with fee), and subsequent agreement, must be completed prior to initiating any such work. Notification to the DFG should be made after the project is approved by the lead agency. The agreement process should not be used in lieu of specific mitigation measures to be included as conditions of project approval by the lead agency. The 1600 agreement should be sought after appropriate U.S. Army Corps of Engineers permits are secured.

If we can be of further assistance, please contact Mr. Stafford Lehr, Fishery Biologist, at (916) 355-7090, or Mr. Jerry Mensch, Environmental Specialist IV, at (916) 355-7030.

Sincerely,

L. Ryan Broddrick
Region Manager

cc: Mr. Wayne S. White
U.S. Fish and Wildlife Service
2800 Cottage Way, Room E-1803
Sacramento, California 95825

U.S. Forest Service
Forest Supervisor
El Dorado National Forest
100 Forni Road
Placerville, California 95667

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

Roger K. Patterson
Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way
Sacramento, CA 95825-1898

Robert J. Reeb
General Manager
El Dorado County Water Agency
330 Fair Lane
Placerville, CA 95667

Dear Mr. Patterson and Mr. Reeb:

The Environmental Protection Agency (EPA) has reviewed the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the project entitled **Proposed Water Service Contract, El Dorado County, California.** Our review is provided pursuant to the National Environmental Policy Act (NEPA) [42 USC 4231 et seq.], Council on Environmental Quality (CEQ) regulations [40 CFR Parts 1500-1508] and Section 309 of the Clean Air Act.

The proposed project consists of a water supply contract for El Dorado County Water Agency (Agency) which has entered into discussions with the U.S. Bureau of Reclamation to negotiate long-term water supply contracts from the American River Division, Central Valley Project. Public Law 101-514 directs the Secretary of the Interior to enter into long term municipal and industrial water supply contracts with El Dorado County for up to 15,000 acre feet annually. It is proposed that the contract water would be diverted at the Folsom Reservoir or upstream from the American River or its tributaries.

In defining the project purpose, we recommend that the EIS include options to meet future water supply demands by analyzing alternatives to acquiring contract rights to additional water. The EIS should take into account those limitations on the availability of diversions from the American River given passage of the Central Valley Project Improvement Act and the existence of the Public Trust resources in the American River and the San Francisco Bay-Sacramento San Joaquin Delta Estuary. Given these limitations the EIS should discuss and assess the alternatives

GEN. MGR. B
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regarding points of diversion and in-stream flow requirements of the American and Sacramento Rivers. The EIS should also set out in extensive detail the required water conservation plans for the District, water pricing strategies, and water reclamation opportunities.

We look forward to working with the Bureau of Reclamation and the El Dorado County Water Agency and appreciate the opportunity to review and provide comments on this scoping for the preparation of an environmental impact statement. Please send three copies of the Draft Environmental Impact Statement to this office at the same time it is officially filed with our Washington, DC office. If you have any questions, please feel free to contact me at (415) 744-1584, or have your staff contact Edward Yates at (415) 744-1571.

Sincerely,

Jacqueline Wyland, Chief
Office of Federal Activities

Enclosures: 3
MI #: 1911 ELDO.NOI

cc: Kirk Rodgers, USBR, Water Policy and Allocation Office

GENERAL COMMENTS

Statutory Background

Authorization for this project is set out in Section 206(b)(1)(B) of Public Law 101-514 which directs the Secretary of the Interior to enter into long term municipal and industrial water supply contracts with El Dorado County. These water contracts are for up to 15,000 acre feet annually "considering reasonable efforts to ensure water conservation programs within areas to be served by the contracts." This project must take into account the consultation requirements set out in the Endangered Species Act [16 USC 1531 et seq.] (ESA). This project must also conform to the requirements of the Central Valley Improvement Act (Public Law 102-545) (hereinafter Improvement Act) and the Reclamation Reform Act (Public Law 97-293) which set out standards and criteria for water quality, metering, and conservation, environmental review. These requirements are detailed below. [All code citations refer to sections of the Improvement Act, unless otherwise noted.]

The Bureau of Reclamation is also required to draft a Programmatic Environmental Impact Statement (EIS) for the entire Central Valley Project [§3409] . This process will probably not be completed until well after the El Dorado Water Service Contract EIS has been completed. The Bureau of Reclamation should, therefore, reserve the option of reopening certain contract terms of the El Dorado project in order to meet its statutory mandates under the Improvement Act.

Purpose and Need for the Project

When specifying the purpose and need of the proposed action [40 C.F.R. § 1502.13], we recommend that the project purpose specify the current water supplies and the projected demand for additional water sources. These projections should set out the various projections given different levels of water conservation and pricing described below. This section should also point out the environmental purposes for American River water that have been established by the Improvement Act. Section 3406(b)2) of the Improvement Act requires the Secretary of the Interior to dedicate annually 800,000 acre-feet of Central Valley Project (CVP) yield for the restoration of fish, wildlife and habitat and to protect the waters of the San Francisco Bay-Sacramento/San Joaquin Delta Estuary (Bay-Delta).

Further, the Environmental Impact Statement (EIS) should recognize both the specific project purpose and the broader environmental purposes set out in the Improvement Act and other

laws such as the Endangered Species Act. Any quantity of water for the project should be explicitly conditioned on availability of water after meeting environmental purposes. The EIS should identify these purposes/requirements and demonstrate how they will be implemented. In assessing alternatives, the EIS should present a range of actions that are directed toward satisfying project purposes and objectives.

Alternatives Analysis

When evaluating all reasonable alternatives and discussing reasons for eliminating other alternatives [40 C.F.R. § 1502.14], we recommend that project sponsors consider a combination of alternatives in addition to those stated in the Notice of Preparation for this EIS. A combination alternative could include water conservation, water reclamation, water transfers and water pricing. The EIS should also include the "No Action" alternative as required by the CEQ regulations [40 CFR 1502.14(d)]. A no action alternative could describe the above mentioned combinations without any additional water contracting.

Water Conservation. Section 210(b) of the Reclamation Reform Act requires each water district that has entered a water service contract to develop a water conservation plan which shall contain "definite goals, appropriate water conservation measures, and a time schedule for meeting the water conservation objectives." Section 3405 of the Improvement Act directs the Bureau of Reclamation to establish criteria for evaluating the adequacy of these water conservation plans. The Bureau has issued such criteria (April 30, 1993) and has recently finalized this criteria in a Guidebook issued June 1, 1993. The EIS should demonstrate how El Dorado County is complying with the requirements in these guidance documents that are applicable to El Dorado.

The EIS should also use the enclosed guidelines for water conservation, "Best Management Practices," (BMPs) issued by the California Urban Water Conservation Council [Memorandum of Understanding Regarding Urban Water Conservation in California, September, 1991]. The EIS should also expand on these BMPS where appropriate, e.g. design requirements for new development, water reclamation, use of conserved water.

Section 3405(b) requires that any new water contract for CVP water must include a requirement that all water delivery systems within the recipient district must be equipped with water measuring "devices or methods" within 5 years of the contract or amendment. The EIS should address this requirement by describing El Dorado's plans to institute metering.

Water Transfers. Section 3405(a) provides the authority for California water agencies to use water transfers as alternatives to new contracts or supplies. The EIS should examine the opportunities for water transfers especially those in the same or adjacent watersheds such as Placer County.

Water Price Tiering. Section 3405(d) sets out a system of tiered pricing whereby prices shall increase in relation to water use. These price tiering standards are minimum requirements. The EIS should discuss in detail how more extensive price tiering (i.e. that which goes beyond the minimal requirements of the Improvement Act) can be used to further encourage water conservation and reduce dependence on contracted water.

Point of Diversion. Section 206(b)1)(B) of Public Law 101-514 states that the water supply contract may come from Folsom Lake or for exchange upstream on the American River or its tributaries. The EIS should describe the reasonable range of alternatives regarding possible points of diversion given this statute and given downstream flow requirements in the American River. Such instream flow requirements were established in Environmental Defense Fund v. East Bay Municipal Utility District, Civ. No. 425955 (Alameda Sup. Ct., Jan. 2, 1990) (EBMUD). The court stated in EBMUD that, "The court intends that instream flow requirements be an absolute limit on EBMUD's ability to divert water from the Folsom South Canal. When the instream flow requirements cannot be met, EBMUD may not divert any part of its appropriation."[Id. at 109-110.] The El Dorado EIS should address these limitations and those imposed by the Improvement Act and ESA and demonstrate how those limitations will be complied with.

Other Comments

The DEIS should cite specific documents and page numbers for documents incorporated by reference, and briefly describe the contents of the referenced material. The project sponsor should ensure that referenced materials are reasonably available for inspection. [40 C.F.R. § 1502.21]

DESCRIPTION OF THE ENVIRONMENT/ENVIRONMENTAL CONSEQUENCES

Direct, Indirect and Cumulative Impacts

The DEIS should discuss direct, indirect and cumulative effects of the proposed action. Indirect impacts [40 CFR 1502.16] include growth inducement. Discussion of growth inducing effects [40 CFR 1508.8] should include discussion of 1) the increases in air and water pollution, soil-related problems

(e.g. soil erosion or groundwater contamination), and habitat loss resulting from possible commercial and residential development induced by new water supplies and 2) the additional fiscal resources that will be required to protect air and water quality, reduce water demand, avoid significant impacts on wildlife habitat and wetlands, etc.

Cumulative impacts result from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions, regardless of what agency undertakes the action [40 C.F.R. § 1508.7]. Cumulative impacts include both temporal impacts - those impacts of related or nearby development that will reasonably occur in the future and "spatial" impacts - those impacts that will combine with other unrelated or geographically removed actions that will be expected if the individual impacts are allowed to accumulate. For instance, energy facilities established to distribute water may combine with both urban development spurred by additional water supplies and increased recreational use of the El Dorado National Forest to degrade air quality. Or, where project impacts combine with other water resource projects to increase water quality, such impacts must be assessed cumulatively. [U.S. v. 227 Acres of Land, 760 F2d 345 (S. Dist. NY 1991)].

Water Quality and Water Dependent Resources

Water Quality. CEQ regulations require that EISs include discussion of the "Natural and depletable resource requirements and conservation potential of various alternatives and mitigation measures." [40 CFR 1502.17(f)]. The EIS should, therefore, identify existing and potential designated uses[1] and the applicable water quality standards for the American River drainage. This section should also describe requirements for providing higher freshwater flows in the American River to enhance water quality for support of designated uses propagation of anadromous fisheries, and increased wildlife refuge water supplies. The EIS should include a detailed description of existing and baseline conditions and deficiencies in these conditions in regard to any impacts affecting the Bay-Delta. Guidelines issued by the EPA, Department of Commerce and Department of Interior for determining such baseline conditions are enclosed [Guidelines for Determining Sacramento-San Joaquin Delta Baseline Conditions].

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[1] To avoid confusion with the phrase "beneficial uses" in Reclamation law, water uses protected pursuant to federal (e.g. Clean Water Act, §303) and state water quality laws are here called "designated uses."

The EIS should acknowledge that standards for the Bay/Delta are being reassessed and may be revised because designated uses are not adequately protected by existing standards. We recommend that the EIS: 1) discuss requirements pursuant to the Clean Water Act to meet revised water quality standards and protect designated uses; and 2) explain any current legal or policy constraints to complying with these standards.

Federal agencies must comply with the federal consistency requirements of the State's Nonpoint Source Management Program [Clean Water Act, §§ 319(b)(2)(F), 319(k)]. The EIS should identify potential sources of nonpoint pollution from building and operating the proposed action. Such sources may include, but not be limited to, sediment, heavy metals and herbicides.

Department of Interior antidegradation policy has been incorporated into water quality standards issued by EPA [40 CFR 131.12]. EPA's antidegradation policy, reinforced by the 1987 Water Quality Act, requires that once designated uses of a water segment have been achieved, the uses must be maintained and fully protected. The revised DEIS should disclose whether each alternative is consistent with the antidegradation policy established by the State and approved by EPA as a provision of the State's water quality standards.

Wetlands/Fisheries/Biological Resources. The EIS should identify the requirements of the ESA and the plans for complying with those requirements. The EIS should address specific needs of Delta fisheries and we suggest that the Agency and the Bureau of Reclamation work closely with the U.S. Fish and Wildlife Service (USFWS), the National Marine Fisheries Service (NMFS) and the California Department of Fish and Game (CADFG) in assessing these needs, avoiding impacts to those fisheries and mitigating any possible impacts. In particular, the EIS should evaluate potential impacts to threatened and endangered species (e.g. Delta Smelt, Winter Run Chinook Salmon) rare or sensitive endemic communities and candidate species.

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Dredge and Fill. In regard to any fill activities that may occur the EIS should: identify whether the project will cause or contribute to significant degradation of the waters of the United States and should demonstrate how the proposed action will comply with the guidelines promulgated pursuant to Section 404(b)(1) of the Clean Water Act [40 C.F.R. Part 230]. In particular, the EIS should:

a. demonstrate that the project sponsors have selected the least damaging practicable alternative based on costs, logistics and existing technology with respect to waters of the United States. [40 C.F.R. § 230.10(a)].

b. describe how the project sponsors will avoid, minimize and mitigate the potential impacts of implementing each of the alternatives. (See MoA between EPA and the Army concerning the determination of mitigation under the Clean Water Act Section 404(b)(1) Guidelines from which pertinent information may be drawn.) For impacts that are unavoidable, the EIS should include detailed mitigation, including specific site plans and propose a mitigation ratio. It should not propose use of offsite waters or wetlands for mitigation.

c. demonstrate that implementing the action will not jeopardize the existence of species listed as endangered or threatened under the Endangered Species Act of 1973 or result in the destruction or adverse modification of a habitat which is "critical habitat" under said law.

d. discuss how the impacts of the proposed action may contribute to cumulative losses of waters of the United States in the area.

Stream Evaluation, NO. 86-1.

Hazardous Substances

The EIS should specify whether any hazardous substances, such as petroleum products and pesticides, will be used/ generated as a result of implementing the proposed action. If the project sponsors expect to use hazardous substances (40 C.F.R. § 302.4) in conjunction with the proposed action, the EIS should discuss how the project sponsors will protect against spills in compliance with the requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the methods that will be used to clean-up and dispose of spills/wastes in compliance with the Resource Conservation and Recovery Act (RCRA) regulations found at 40 C.F.R. § 260 to 268.

Air Quality

As mentioned above in the Direct, Indirect and Cumulative impacts section above the EIS should assess any growth inducing impacts, including residential, commercial and industrial development which may result in degradation of air quality. The EIS should:

1. Discuss whether the project area is designated a nonattainment area and if so then it should identify the particular pollutant(s), the degree of nonattainment and the levels of violations of state and federal standards.

2. Include relative state and federal statutory requirements for air quality plans and discuss current planning efforts to revise any of those plans.

3. Identify PSD Class I Areas (i.e., wilderness areas, National Parks, e.g. Desolation Wilderness Area), which receive special protection for particulates, SO_2, NO_x.

4. Identify areas with special visibility value or protection.

E I P Associates

November 18, 1994

TO: Marie Davis and Jonas Minton

c: E.J. Koford and Rick Hanson

FROM: Grant Werschkull

SUBJECT: FOLLOW-UP TO INTERVIEWS

Attached are the write-ups from interviews I completed over the last few months. Jonas indicated he wanted an opportunity to review these before they are mailed to the individuals we interviewed.

If you have any revisions or edits, you should direct them to Rick Hanson.

The interviews are organized as follows:

- PG&E
- Business Community
- Friends of the River/CA Sportfishing Alliance
- American River Land Trust
- El Dorado County Parks and Recreation Div.
- Western States Endurance Run
- California Dept. of Boating and Waterways
- El Dorado County Assessor's Office
- El Dorado County River Management Advisory Committee.
- American Whitewater Association (they sent a letter following the interview)

The final section includes letters to entities that were not able or preferred not to participate in an interview at this time.

October 24, 1994

Frank R. Lynch
Senior Hydrographer

Richard H. Moss
Law Department

Joseph R. Ray
Hydro Engineer

Pacific Gas and Electric Company

SUBJECT: FOLLOW-UP TO SEPTEMBER MEETING REGARDING PROPOSED EL DORADO COUNTY WATER AGENCY PROJECTS

Dear Gentlemen:

The purpose of this letter is to briefly outline comments and the relevant discussions we had concerning the subject project.

- PG&E testimony before SWRCB: Regarding operation of PG&E facilities and related potential impacts and concerns from above Folsom diversions, you recommended that we carefully review PG&E's testimony before the SWRCB to better understand potential impacts and issues.

- Diversions: A more detailed description of where diversions might occur and who may be losing the use of the water El Dorado proposes to divert was requested.

- Harmonious operations within the watershed: It was stated by Jonas Minton and Marie Davis that the El Dorado County Water Agency and Georgetown Divide Public Utilities District both are interested in "harmonious operations in the watershed."

- Agreements and senior water rights: It was discussed that for any proposed diversion there would also need to be agreements with PG&E or other senior water rights holders in order to actually implement a diversion. For example, PG&E relinquishes water rights below Chili Bar but could nonetheless be impacted from proposed diversions downstream.

- Above Folsom Reservoir diversions: You suggested that there is more likelihood of protests as diversions are proposed further above the Reservoir.

- Proposed diversion information: We discussed that information about 1) how much water and 2) when the water would be diverted including the season of diversion and the time of day will be critical information for adequate analysis and evaluation of proposed diversions.

- Hourly modeling of flows as a result of proposed diversions will be necessary.

- There is flow data at 15 minute intervals at Chili Bar and Lotus.

- Upstream reservoirs: Since PG&E has already "made peace" with many upstream water rights holders, you expressed concern regarding the problems and implications associated with changing those agreements and operation schedules (and whether or not changes would be acceptable).

- Upstream stakeholders: The Sierra Club Legal Defense Fund/Steve Volker has represented many of the upstream stakeholders in the recent litigation with El Dorado County.

- Diversions below Chili Bar: Since PG&E must provide minimum flow requirements below Chili Bar, other diversions in that stretch would need to be evaluated in the context of the resulting flows and the cumulative upstream impacts related to continued compliance with minimum flow requirements. Since minimum flow requirements are met through releases from upstream storage, El Dorado may need upstream storage (or agreements with those that have it) in order to maintain minimum flow requirements (which would not be met as a result of proposed diversions).

- FERC and minimum flows: PG&E is responsible to FERC for meeting minimum flows requirements and this is a very important matter.

- Power generation: There will likely be power generation impacts with the proposed diversions related to some of the considerations listed above. You explained that SMUD facilities are primarily operated for voltage control but not capacity. (On a wet year, SMUD may switch to more power generation).

- Spill condition: This typically occurs (at White Rock) at flows above 2200 cfs.

- Operations agreement: This would probably be the mechanism for PG&E and El Dorado to work together to reduce adverse impact to fish and other river uses. Once the daily take is established, it would then be timely to begin a more detailed discussion re an operations agreement which could define acceptable timing of the take. Concerns of upstream protestors would have to be resolved as part of this process as well.

- Operations agreement and related mitigation: Power is more valuable than dollars. It may be more desirable to repay/mitigate power generation impacts with power.

- PCWA: A similar discussion is needed with PCWA concerning minimum flows and fish flows. Frank may be interested in attending that meeting.

- Water conservation (gal/per household) and losses in the delivery system: These will be important issues in the environmental/project analysis. Most foothill water agencies have difficulties with these two elements.

- Retrofit toilets: Other communities are installing low-flow toilets as a way to stretch supply.

- Small Alder alternative: This alternative may provide useful opportunities for cooperation with PG&E and the Dept. of Fish and Game (DFG). DFG (J. Mensch) has indicated some interest in an off-stream hatchery. (See testimony before the SWRCB for more insights). Coordinated operations, the El Dorado canal and PG&E relicensing are issues that could be discussed further as part of this alternative.

- 1919 contract: There may be negotiations in the future to bring this contract up to a compensatory level. There are multiple long term issues related to the contract. (See Osgood case in the Supreme Court for further insights).

- 184 License: Relicensing at 2002. In the early years, required minimum flows were 5 cfs. Now they are 50 cfs. More studies will be required and the licensee will be required to complete them. FERC is the licensing authority as specified by the Federal Clean Water Act.

Thank you for taking the time to discuss these issues. If you would like to further comment on any of the above issues, please call Jonas, Marie, or EIP Associate's Project Manager, Rick Hanson.

Sincerely yours,

Grant D. Werschkull, Associate

November 18, 1994

Albert E. Hazbun, P.E.
760 Lakecrest Drive
El Dorado Hills, CA 95762

Edward T. Murray, President
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3025 Sacramento St.
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Skip Schmidt, Associate Director
Building Industry Association
3800 Watt Ave., Suite 140
Sacramento, CA 95821-2670

SUBJECT: REVIEW OF 8/18/94 INTERVIEW COMMENTS RE EL DORADO COUNTY WATER AGENCY PROPOSED CVP WATER SERVICE CONTRACT

Dear Albert, Ed, Kathye, and Skip:

As we complete the interview phase of the project, I am sending out my record of draft comments from individuals we have interviewed for their review and, if necessary, additions. Attached please find my outline of key subjects we discussed during the interview.

- (Kathye) Concern that mitigation for the project could be too costly and that environmental organizations could intentionally drive up the cost of the project as a way to defeat a project.

- (Ed) The project must have a very comprehensive analysis of costs (both direct project as well as mitigation costs) and a complete discussion of how the project would be funded if approved.

- (Skip and Ed) There needs to be a way to evaluate the legitimacy of comments from entities that may not be sincere in their contributions to the environmental process. Environmental laws require mitigation for legitimate environmental impacts, but we are concerned about people that will try to make this project unaffordable as a way to control growth.

- (Ed) The lower on the river (or reservoir) you divert, the more likely you are going to incur pumping costs since you will not be able to utilize gravity in the delivery system.

- (Albert) There should be consideration of more fully using Sly Park as a storage facility to serve County needs. If more could be water made available for storage in that reservoir then the firm yield could be increased because capacity exists. (Ed) Other than the diversion impacts and issues of where water would be secured for storage in Sly Park, other impacts would be minor if any because the reservoir is already constructed.

- (Albert) Regarding Folsom Reservoir as a diversion location: This project should evaluate the capability and capacity of the El Dorado Hills treatment plant. Be aware that the existing plant is located in the middle of expensive homes and is in proximity to a school. Alternate treatment plant locations as well as the conveyance pipelines will have to be identified and evaluated.

- (Albert) There are some "conditions" on the El Dorado Hills treatment plant as a result of previous agreements with the City of Sacramento. It will be important for the environmental documents associated with this project to reference those conditions and to address any requirements that may limit the expanded use of the Plant. (Jonas) We should find out who at the City is knowledgeable about that agreement and make sure there is mutual understanding of what the agreement requires in the context of expansion.

- (Ed and Skip) A "forum process" similar to what is being advanced in Sacramento could be useful at some point in El Dorado. (This was a general comment about water, growth, and the need to help different interests be more constructive, joint-problem solver oriented and less confrontational).

- (Ed) Watch-out about having too many program EIR components because the resulting environmental document may be lacking in the specificity to soundly provide a basis for answering questions and concerns. Make the analysis more comprehensive and it will save time and effort in the long run.

- (Ed) Beware of PG&E and SMUD operational issues and problems. These issues must be addressed. And in the context of the last point, the project and the resulting impacts must be defined with sufficient specificity so that PG&E operational issues/problems can be identified and addressed. (Jonas: The State Water Resources Control Board made if very clear that if operational agreements will be necessary for this project, then the agreements or the essence of them should be included in the environmental document).

- (Ed) Go back and carefully review the SOFAR environmental document to see if there are other environmental issues that should be addressed as part of this project.

- (Ed) Big picture thinking about what needs to be done with this project is important. Other foothill water projects have failed to look at operational agreements and what will need to be done with other critical water manager/operators (power producers). As a result, those projects were almost a waste of time.

- (Albert) Regarding where water will be used and County water needs: Look at the work of EID and CH2M Hill which expands on what is presented in the general plan. Also, EID has a very thorough reclaimed water masterplan which includes many aspects of water conservation.

- (Skip and Ed) Regarding uncertainty: How secure will this Bureau of Reclamation water be? If the trend of increased CVP deliveries for fish and wildlife continues in the future, how will the water for this project be influenced?

- (Ed) The subject of water rates will be a political issue in the future. It is not unusual to see EID water bills in excess of $150 (for a two month period) in his neighborhood. There are limits and ultimate price sensitivities to what people will be willing to pay for water. (Jonas: Rate increases may eventually influence the elasticity of demand. However, the EIR process may not be a very effective tool for evaluating the political implications of rate increases. But how much the project will cost, who will pay for it, and how will it affect rates are questions that will be asked). Ed continued: Maybe the environmental document should look at what has happened in other areas and water districts. There are instances of where water has been priced so high that demand dropped precipitously and therefore threatened the financial solvency of the water district.

- (Skip and Ed) The projections for agricultural water needs in El Dorado County should be critically reviewed (projections may be too high). As we've seen in other parts of the State, where there are subsidies for agricultural water coupled with increasing rates for all water customers, there will undoubtedly be increased scrutiny of the ag subsidies.

- (Albert and Ed) Outlined several of the specific plans that are underway in the County. These specific plans should be useful in providing better insight to growth related water demand. (Jonas: The general plan will also be utilized to project growth and related impacts and water needs).

Thank you for taking the time to discuss these issues. If you have any additions to the above, please send them to Rick Hanson, EIP Associates Project Manager, or pass them along to Jonas Minton.

Sincerely yours,

Grant D. Werschkull, Associate

November 14, 1994

Jim Crenshaw
California Sportfishing Alliance
1248 E. Oak Ave., #D
Woodland, CA 95776

Steve Evans
Friends of the River
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Sacramento, CA 95814

SUBJECT: REVIEW OF COMMENTS FROM THE AUGUST 15 INTERVIEW CONCERNING THE EL DORADO COUNTY WATER AGENCY PROPOSED WATER PROJECT (CVP SERVICE CONTRACT)

Dear Jim and Steve:

Attached is a draft transcript of the interview. Would you please review this and note any corrections and/or additions?

You are both on the mailing list for the Notice of Preparation and the Notice of Intent which will initiate the EIR and EIS processes respectively. If we don't hear from you in the next few weeks, I will assume your additions to the interview are minor . . . . and you will be making further comments during the EIR/EIS processes.

Q 1. Do you have any questions about what I've just described as far as the preliminary definition of the project?

- What volume of the acre-feet would be diverted at what time and what would that be in terms of cfs?

- (Steve) Division of who gets what water is important because it guides where the diversions are. Georgetown, of course, is interested in diverting out of the Middle Fork and possibly the South Fork whereas El Dorado County Water Agency is interested in diverting out of the South Fork.

Q 2. What potential impacts from the project are you most concerned about?

- From diversions from the Middle Fork, Friends of the River would be concerned about impacts on the wild and scenic river potential of the Middle Fork which is a river that has been determined to be eligible for national wild and scenic river status and under

federal guidelines is to be managed to protect those values until Congress decides as to whether it should be added to wild and scenic system. Diversions on the Middle Fork could affect the river's outstanding recreation values, fishery values, ecological values, and historic/cultural values and that would be an issue that must, by Federal law, I think, be analyzed in any kind of environmental documentation.

- In terms of the South Fork, we have very similar concerns. Minor diversion of the South Fork could marginalize the recreational values of that river in ways not only of environmental and aesthetic concerns, but public safety concerns in regards to reducing the viability of that river as a boating river for white water recreation.

- On both rivers we would be concerned about impacts -- the physical impacts of the diversion. Are we talking about a dam, if so, a small dam, a large dam, or are you talking about somebody sticking a straw in the gravel, which has far less impacts from our point of view in terms of the immediate physical setting.

Q 3. What potential impacts from the project are likely to present the most serious problems in terms of moving a project forward?

- From our perspective (California Sportfishing Protection Alliance), the diversion points are important -- what kind of diversions are going to be diverted out of each diversion point -- how that's going to effect fishery flows, whether fishery flows are going to continue to be what they are now or if it's going to be over and above that. The other aspect of this is how is it going to affect downstream users and fishery flows, including endangered species and indigenous species. There needs to be some sort of cumulative effect study on all this to determine how much water -- the total amount of water that we're going to take out if a project goes through, or 2 projects or 3 projects or whatever because there's a significant cumulative effect of all these projects.

- Perhaps a watershed-wide analysis of future conditions is needed? The environmental analysis has to look at the likely foreseeable changes in how the watershed is managed. For example, on the South Fork these water diversions are fairly small potatoes compared to how -- or what SMUD and PG&E do with the water on the South Fork and when those SMUD and PG&E hydro projects are up for re-licensing. It's going to, like, rearrange the whole waterscape in terms of what better flows do we need for fisheries, whether there are going to be flows for recreation versus how much water we are going to take out of the river, where we're going to take that water out. And that's an issue, sort of a macro issue that has to be looked at into the future in terms of how these projects fit into that future scenario of, I guess, rearranging the water rights on the river, especially with these large projects which are the primary generator of how the river flows are managed right now.

- The Bureau is supposedly going through some study of how they store water in Folsom for flood control and that needs to be factored into this picture, too, because that could change this whole scenario also.

- And it's not just Folsom either. One of the realistic alternatives that the Corps will be proposing, we think, in the very near future on Sacramento River flood control issues is -- or town of Sacramento flood control issues -- is operating upstream dams, dams upstream of Folsom to improve better flood control on a watershed wide basis. So that's another consideration.

Q 4. What do you believe will be the most effective approach for evaluating and accurately estimating these impacts?

- This is Steve. Interviewing the stakeholders to identify issues is good but as we get further along when you actually have a project to propose, and have answered some of these questions, I think it's very important to have a public meeting -- but not these giant public meetings where people have an opportunity to get out there and make a statement for three minutes and then sit down -- but perhaps smaller meetings that include groups of stakeholders. Like instead of just relying on California Outdoors and American Whitewater Affiliation to represent "the boating community" maybe hold a public meeting for the boating community so that boaters as a whole can understand what this project means for them and state their opinions on it. You know, I imagine people in Georgetown and Kelsey probably would like to have a meeting in their area so they can discuss the pros and cons of what this means for growth for their community. And I imagine, that there are going to be polarized feelings. I think it's important that those people -- those groups of stakeholders be given an opportunity to sort of look at one aspect of this project rather than through some giant public meetings where they drone on for hours and they're restricted to the very short comment period. So public outreach and education are keys to a successful approach.

- This is Jim. The other thing is you are going to have to complete a thorough environmental analysis process before you go through the comment and public meeting process. You know, we need to know all those things so that when we have these public meetings, people can really have assessments of what's going on and how are the releases scheduled -- how they're going to be changed, and what possible mitigations there are and what the different alternatives are. And we'll need the cumulative impacts analysis and how it's going to affect or possibly affect both the users and the river ecosystem.

Q.5 What types of mitigation measures for the adverse impacts of this project should the EIR/EIS analyze?

- This is Steve. Again, at the minimum, I think residential water users should adopt the principles of the urban water MOU and also adopt a policy that they will improve those best management practices as they are revised and adopted by the other sides of the MOU. I think everybody realizes that both in water and energy, demand side management is the key to reducing the need for further diversions.

- Secondly, I am intrigued by the idea that diversion from the Auburn Dam site could lead to potential restoration. That's something we should really be looked into.

- Thirdly, I think any diversions should not result in a change in the free-form character of the river, therefore diversions, again, the straw in the gravel approach is much more acceptable than the dams and diversions.

- This is Jim. The only other thing I could add is I think maybe a little better access points to some of the river might be in order -- access is getting pretty restricted, seems like it gets more restricted all the time for both boaters and fishermen, so I think there needs to be some concern and some improvement over this access issue.

- This is Steve. Long term protection/management should be considered as mitigation: If the project proponents are able to withdraw water and provide adequate mitigation for the local and direct impacts, then there should be serious consideration to this project incorporating wild and scenic river designations and/or a NRA to offset cumulative impacts. This would help to address the concerns of the many public interest and regulatory agencies which worry that this project will simply continue the degradation of the river ecosystem. Commitment on the part of the El Dorado County Water Agency to take the necessary political and policy steps to secure this type of protection would give confidence to public interests that El Dorado is a dedicated partner in long term stewardship of river resources.

Q 6. Are there other potential desired outcomes that we should consider as potential mitigation related to this project?

- This is Jim again, from the cumulative impact view of growth, you need to start looking at the other end of the system, the sewage system and increasing the use of reclaimed water. Reclaimed water can be used on golf courses and so much more.

Q 7. What other alternatives should the EIR/EIS analyze for providing a secure water supply?

- Water marketing -- Placer County Water Agency fairly routinely sells surplus water to downstream users and I don't see any reason why Georgetown or El Dorado County shouldn't be able to purchase that water and perhaps divert it right at Folsom Reservoir. You know, that's just one example, but I think -- there are others.

Q 8. Do you have other suggestions which you believe would improve the project and enhance the chances for a project that would be acceptable to your interests?

- This is Steve. There may be a need for the entire watershed to be adjudicated. This could provide a more realistic approach to understanding all the projects and the water rights that exist now and are being proposed.

Q 9. Are there other important obstacles to this project which we have not discussed?

- Jim. Will the El Dorado County Water Agency be seeking additional appropriations within the watershed? "Change petitions" will probably be required for any changes to existing appropriations. I suggest talking with the State Water Resources Control Board

about how to structure and approach any new appropriations.

Q10. Do you have other concerns regarding this project which we have not discussed?
Q11. What part of this project would you change or eliminate?

- This is Steve. I would seriously reconsider the need for this project. I am personally concerned about continued growth and the resulting impacts from diversions on California's already seriously compromised river and stream resource ecosystems. I think it is a mistake to look first to further water development rather than to more creative and dedicated water management.

- Jim. I also have serious concerns about further diversions from the American River system. We are concerned about those impacts within the watershed and also over-commitment of the CVP to non-environmental uses. Historically, the environment and the river ecosystem including fish has taken a backseat to water development. We hope this trend can be reversed. We see the CVPIA has potential to be a step in the right direction. So we would not like to see this project compromise, in any way, the CVPIA and restoration that is envisioned as part of CVPIA.

Q12. Are there diversion points or ways of diverting water that you believe are more desirable than others?

- The lowest diversion point is best because it leaves the water in the river for the longest possible amount of time.

Q13. Are there other interest groups and constituencies that we should contact?

- FAWN/Karen Schamback in Georgetown
- PCFFA/Zeke Grader
- United Anglers/John Beuttler
- Striped Bass Assn./(Jim can provide a name)
- American Whitewater Assn/Susan Scheufele
- Re proposed Maine Bar diversion: Be sure and talk to the Tevis Cup people. Charlie has contacts with them, if needed.

Thank you for your interest and time.

Sincerely yours,

Grant D. Werschkull, Associate

P.S. If you have further questions, please direct them to Rick Hanson, EIP Associates Project Manager (325-4800) or Jonas Minton at the El Dorado County Water Agency.

November 18, 1994

Alan Ehrgott
American River Land Trust
P.O. Box 562
Coloma, CA 95613

SUBJECT: FOLLOW-UP TO INTERVIEW CONCERNING THE EL DORADO COUNTY WATER AGENCY PROPOSED CVP WATER SERVICE CONTRACT

Dear Alan:

Outlined below is a draft of you comments from the August interview. If you would like to make any revisions or additions, please mail these to E.J. Koford here in our Sacramento Office.

Questions and Comments

Q2 What potential impacts from the project are your most concerned about?

- fisheries impacts from the diversions for the entire watershed.
- growth inducement and resulting impacts if there is growth (such as air quality , commercial timber if air quality deteriorates, and impacts to native habitats)
- downstream economic impacts to already established economies during drought periods if El Dorado is able to divert water.
- concern about exceeding the carrying capacity of county
- concern that scientists suggest the longer term view of precipitation (over the last few thousand years) indicates that longer drought periods are more typical of this region.
- secondary impacts and cumulative impacts that may appear with a decreasing resource base.

Q3 What potential impacts from the project are likely to present the most serious problems in terms of moving a project forward?

- costs of infrastructure within a rural economy, particularly with wastewater treatment.

- impacts related to irreversible commitment to future development due to the need to finance the above infrastructure. (You noted that existing treatment plants at Deer Creek and Cold Creek are not up to regulatory standards).

- concerning air quality impacts, the Sacramento basin has already exceeded ozone standards.

- inability of Federal government to assist with needed infrastructure due to Federal deficits and constrained spending.

- social impacts and conditions associated with the larger urban area El Dorado would become with this water will be a burden and will be unattractive to existing residents.

Q4 What do you believe will be the most effective approach for evaluating and accurately estimating these impacts?

- estimate infrastructure costs for the above based on the significantly reduced state and federal assistance to the County.

- do a cost benefit analysis of delivery of the subject water to an existing metropolitan area with existing municipal and industrial infrastructure vs. building new infrastructure and development in an area such as El Dorado.

Q5 What types of mitigation measures for the adverse impacts of this project should the EIR/EIS analyze?

- reducing mobile and point sources of air pollution and other costs associated with improving air quality.

- purchase of additional easements along rivers and streams for habitat protection and restoration as well as recreational use.

- set-up a habitat acquisition program funded by a enhancement fee (per gallons or acre foot) of El Dorado County water use and sales.

- set-up a similar program to serve other important conservation purposes including air quality (source control and removal).

Q6 Are there other potential desired outcomes that we should consider as potential mitigation?

- geographic location of development to correspond with lower elevation diversion points.

Q7 What other alternatives should the EIR/EIS analyze for providing a secure water supply?

- reduce residential densities within the general plan.
- maintain agricultural zones (seek broader application of the Williamson Act).
- reduce the landbase for development.

Q9 Are there other important obstacle to this project which we have not discussed?

- maintaining biological diversity and a healthy resource base in the Sierra Nevada.
- other secondary impacts.

Q12 Are there diversion points or ways of diverting water that you believe ar more desirable than others?

- lower elevation diversions and use existing diversion points.

Q13 Are there other interest groups and constituencies that we should contact?

- downstream users

Thank you for taking the time for this interview. You are on the mailing list for all EIR/EIS public notices and documents related to this project.

Sincerely yours,

Grant D. Werschkull, Associate

November 7, 1994

Craven Alcott, Director
Jeff Novak, River Recreation Supervisor
El Dorado County Parks and Recreation Division
2850 Fairlane Court
Placerville, CA 995667

SUBJECT: REVIEW OF 8/18/94 INTERVIEW COMMENTS RE EL DORADO COUNTY WATER AGENCY PROPOSED CVP WATER SERVICE CONTRACT

Dear Craven and Jeff:

As we complete the interview phase of the project, I am sending out my record of draft comments from individuals we have interviewed for their review and, if necessary, additions. Attached please find my outline of the key subjects we discussed during the interview.

What potential impacts from the project are you most concerned about?

- impacts to river flows including the volume of diversions, the duration of those diversions, and the time of day that diversion occurs.

- secondary visual impacts that may be visible from the river and from other recreation use areas such as trails, camping areas, and overlooks.

- impacts to water quality. We hear many comments from visitors regarding the algae on the South Fork. Some have suggested that this is due to the fact that South Fork flows are "down" for long periods which results in warmer flows that are more conducive to algae.

- impacts to commercial and private rafting and whitewater activity.

- resulting economic impacts if flows will be diminished to the point of influencing private and commercial use. Correspondingly, If flows can be altered to improve private and recreational use, perhaps this should be evaluated, too.

- see the 1984 EIR and River Management Plan.

- also see Jim Testa (California Dept. of Parks and Recreation) regarding economic impacts related to commercial and private recreation activity on the South Fork.

What potential impacts from the project are likely to present the most serious problems in term of moving a project forward?

- if flows are altered, and there are impacts to the commercial rafting interests, then this would probably be one of the most serious.

- However, if the altered flows could be beneficial to river users, then these interests may be useful in advancing the project.

- If algae increases, the parties that pump water from the river may be impacted. (The County Parks and Recreation Division has such a pumping facility).

What do you believe will be the most effective approach for evaluating and accurately estimating these impacts?

- There needs to be an accurate assessment of current river-related use and how that use is tied to the existing flow regime. (There have been suggestions made to the Parks and Recreation Division about how flows could be changed to improve recreation use on the river and "spread-out" what are often crowded and congested conditions).

What types of mitigation measures for the adverse impacts of this project should the EIR/EIS analyze?

- how can safety be improved and advanced for the thousands of annual visitors to these river corridors? These would be good mitigation measures.

- how can this project relieve the congestion on the river. This could also improve the quality of their experience.

- improved access: Possible options for improved access include 1) better access to the class II section below Troublemaker rapid; 2) a take-out for those rafters/paddlers completing the run above this class II section (so they do not create congestion for people on the class II section); 3) an access between Camp Lotus and the Gorge section of the lower run (if the Convict Rock diversion point is used, there could be an access created there).

- Auburn dam site and restoring river recreation to that reach of the American River could relieve some of the pressure on other runs, such as the South Fork.

Are there other potential desired outcomes that we should consider as potential mitigation related to this project.

- work with PG&E and other operators and the regulatory agencies

to have flows (negotiate agreements) that serve the dual purpose of meeting both fish and recreation needs. This could be developed as a mitigation. An example might be to reduce some of the night flows so as to provide more day time flow when recreatial use is highest.

- certainty of flow is important to outfitters and other people that may travel long distances to float and/or fish the South Fork. Improving flow certainty is another potential mitigation.

- it would be useful, if as part of this study there could be an evaluation of what truly constitutes an "optimum flow" from the perspective of recreation interests. This study and analysis would provide an important benchmark for the Parks and Recreation Division and other entities concerned about impacts to American River recreaton.

What other alternatives should the EIR/EIS analyze for providing a secure water supply?

No comment at this time.

Do you have other suggestions which you believe would improve the project and enhance the chances for a project that would be acceptable to your interests?

- if this project could resolve some of the problems (listed above) that currently exist, then that could be a positive thing.

Are there other important obstacles to this project which we have not discussed?

No comment at this time.

Do you have other concerns regarding this project which we have not discussed?

- re land use: if water is made more available then there will probably be increased traffic, air quality and related environmental impacts along with growth. (An example was made of the air quality problems now occurring in Kings Canyon National Park as a result of urban air quality deterioration in neighboring Valley areas). Since a major part of western El Dorado's tourism is linked to river recreation, a concern is how will increased growth influence and/or degrade these recreational experiences?

What part of this project would you change or eliminate.

No comment at this time.

Are there diversion points or ways of diverting water that you

believe are more desirable than others?

- probably diverting at Folsom Reservoir would eliminate some of the problems we have outlined for previous questions.

Are there other interest groups and constituencies that we should contact?

- landowners, particularly along the South Fork should be contacted.

Thank you for taking the time to discuss these issues. If you have any additions to the above, please send them to Rick Hanson, EIP Associates Project Manager, or pass them along to Jonas Minton.

Sincerely yours,

Grant D. Werschkull, Associate

October 24, 1994

Antonio Rossmann, President
Western States Endurance Run
380 Hayes Street
San Francisco, CA 94102

SUBJECT: FOLLOW-UP TO DISCUSSIONS CONCERNING EL DORADO COUNTY WATER AGENCY WATER PROJECTS

Dear Tony:

Thank you for taking the time to get together with Jonas Minton, Marie Davis and me. Outlined below are the key comments that I noted during our discussion.

- Trail use, both foot and equestrian is more year-round than it was several years ago throughout the American River Canyons.

- The Maine Bar diversion has the greatest potential to impact the Tevis Cup (equestrian) and 100 Mile Endurance Run because the proposed pipeline would be in the immediate vicinity of the trails used for those events.

- To better understand potential impacts, it would be important to precisely define the location of the pipeline, provide a picture or drawing illustrating the size and location of the staged pumps, and provide specific dates for the start and completion of construction.

- In general, potential impacts would seem to include visual (pipeline, pumps, construction related) and construction that might interfere with a run or ride.

- Regarding visual impacts, it was discussed that it would probably be preferable to have a pipeline cross a trail than a pipeline parallel a trail.

- Run dates include the June Endurance Run and the Cool Canyon Crawl in mid-March.

- The Tevis Cup is generally scheduled towards the end of July. (We will see that Larry Suddjian and riding component are contacted regarding other organized ride dates).

- A Barbara Schoener memorial bench may be placed along a stretch of the trail near the proposed diversion and pipeline. (Marie Davis indicated she would be checking to see if a location had been selected).

- You indicated a willingness to provide additional suggestions to the project team to help in preventing or reducing impacts to the Run or the Tevis Cup.

- Regarding mitigation and potential improvements that might be useful to trail use, you mentioned that some type of water spigot might be helpful since drinking water is always a need on the trails.

- You expressed interest in hearing more about the concept of a pumping facility at the Auburn Dam site coupled with restoration of the river channel. (This will be described in more detail in the draft environmental documents).

- You described the beauty of different trail segments, noting the prolific wildflowers along the stretch of trail near the Knickerbocker Creek diversion alternative.

Please feel free to write to us with any clarifications and/or additional comments and suggestions you may have. You are now on the mailing list for this project and we look forward to working with you to complete a comprehensive evaluation of the project and alternatives.

Sincerely yours,

Grant D. Werschkull, Associate

Note: On future correspondence or calls for this project, please contact Rick Hanson, the EIP Associates Project Manager.

E I P Associates

November 18, 1994

Mr. James Testa
Boating Facilities Mgr.
Dept. of Boating and Waterways
1629 S Street
Sacramento, CA 95814-7291

SUBJECT: REVIEW OF YOUR PRELIMINARY COMMENTS CONCERNING THE EL DORADO COUNTY WATER AGENCY PROPOSED CVP WATER SERVICE CONTRACT

Dear Jim:

Outlined below is a draft of your preliminary comments and thoughts concerning the project from our "interview". (I wanted to be able to give something in writing to Jonas Minton at the El Dorado County Water Agency). Please feel free to make any revisions or additions to this by sending them to E.J Koford here in our Sacramento Office.

General Comments

- outdoor recreation is a $35 billion/year industry in California and rivers are second largest draw.
- river recreation has grown 2000% since 1970.
- there are 120,000 recreation visits to the South Fork American each year with an economic impact of approximately $30 million contribution to El Dorado County.
- with the above in mind, you would recommend that there be no additional water withdrawals from the North, Middle and South Forks.
- you have real concerns regarding growth being approved without the water and infrastructure to support it.

Q 4: What do you believe will be the most effective approach for evaluating and accurately estimating these impacts?

- you would like more information on paper regarding who diversions will impact recreation in order to respond.

- you would probably not be supportive of diversions during summer months.

Q 5: What types of mitigation measures for the adverse impacts of this project should the EIR/EIS analyze?

- better access and portage trail at the Ruck-a-chucky rapid on the Middle Fork. There are safety concerns at this location and thousands of people pass through this area each year.

Q 12: Are there diversion points or ways of diverting water that you believe are more desirable than other? Why?

- if there are legitimate needs for diversions, and these diversions are based on good planning and sound project approval, then Folsom Reservoir would be a likely diversion point.

- other contacts are Nate Rangel/California Outdoors, Rich Silver/California Dept. of Parks and Recreation at the Auburn State Recreation Area, and Diana Erickson with the U.S. Forest Service/El Dorado National Forest. Charlie Willard may be a contact for others.

You are on the mailing list for all upcoming CEQA/NEPA review and comment documents and notices. Thank you again for taking the time to discuss the project.

Sincerely yours,

Grant D. Werschkull, Associate

November 18, 1994

John Winner and Tim Holcomb
El Dorado County Assessor's Office
330 Fair Lane
Placerville, CA 95667

SUBJECT: FOLLOW-UP TO INTERVIEW CONCERNING THE EL DORADO COUNTY WATER AGENCY PROPOSED CVP WATER SERVICE CONTRACT

Dear John and Tim:

Outlined below is a draft of your comments from the August interview. If you would like to make any revisions or additions, please mail these to E.J Koford here in our Sacramento Office or leave them with the El Dorado County Water Agency for Jonas to review and forward to us.

Questions and Comments

Q2 What potential impacts from the project are you most concerned about?

- impacts to the valuation of land and the tax base. Water is the main factor along with land development that can influence land value.

- water availability could increase the workload for the Assessor's Office. Particularly note that west-side revaluations could dramatically increase.

Q3 What potential impacts from the project are likely to present the most serious problems in terms of moving a project forward?

- political posturing and financing may keep this project from moving forward. Will the County be aggressive in pursuing this water?

Q8 Do you have other suggestions which you believe would improve the project and enhance the chances for a project that would be acceptable to your interests

- a middle-ground project which is advanced through the environmental and regulatory process in a logical and professional manner will have the best chance of success. The project must be realistic.

Q9 Are there other important obstacles to this project which we have not discussed?

- The biggest obstacles are political. There are "no growthers" and residents here that would like to see El Dorado stay as it is today.

- in terms of the use and development of land, Mello Roos bonding and the confidence level of investors is important.

Q12 Are there diversion points or ways of diverting water that you believe are more desirable than others?

- there should be more exploration of flatwater opportunities (reservoir creation) for capturing water.

Q13 Are there other interest groups and constituencies that we should contact?

- be forewarned; there are individuals and interests that will do everything in their power to stumble and prevent further water development for the County. In the Lake Tahoe Myers Flat area, there were individuals that declined opportunities to participate and later attempted to block the project.

Thank you for taking the time to discuss the project. You are on the mailing list for all public notices related the EIR/EIS.

Sincerely yours,

Grant D. Werschkull, Associate

November 14, 1994

Jeff Novak, River Recreation Supervisor
El Dorado County River Management Advisory Committee
Parks and Recreation Division
2850 Fairlane Court
Placerville, CA 95667

SUBJECT: REVIEW OF 8/24/94 RIVER MANAGEMENT ADVISORY COMMITTEE COMMENTS ON THE EL DORADO COUNTY WATER AGENCY PROPOSED CVP WATER SERVICE CONTRACT

Dear Jeff:

Outlined below are questions and comments from the August meeting where Steve Lyle and Jane Harvey from the Committee were in attendance. There were also two individuals (including a Mr. Bertolette and Jim Schultz) with interests in gold dredging that participated in the discussion.

- Will there be a difference in water purification costs for water diverted above Chili Bar as compared to Folsom Reservoir?

- Where is the water supply need that will have to be served?

- What about pumping costs from the diversion locations to these parts of the County that will most need the water? It seems that if the need is in the western part of the County, then the obvious diversion location is from Folsom Reservoir. There does not seem to be as much growth in other parts of the County. (Steve Lyle)

- How many homes could be served by the 15,000 acre feet?

- People need to be able to see the true cost of this project. Make the comparisons understandable. For example, pennies per gallon might be a usable and familiar unit.

- How does EID plan to handle the many homes that are not presently served by the utility, but are instead served by wells? Coloma is not completely served by EID.

- Will there be a complete evaluation of what a true water shortage might mean to El Dorado County? This means a water shortage/drought of the type depicted recently in the Sacramento Bee which provided scientific evidence to suggest that droughts have lasted many decades.

- There needs to be a comprehensive evaluation of costs to El Dorado county residents.

- Water quality is a real concern which will influence cost.

- A major concern is post project flows and if these flows will provide for continued commercial and private rafting on the river.

- A part of the above concern is if there will be fewer hours of "boatable flows" on the South Fork. Since there is already congestion on the river, fewer boatable hours per day will mean significant congestion problems.

- Impacts on the aquatic ecosystem should be fully evaluated.

- If there is a way to reduce the algae in the river, this should be considered as a type of mitigation measure. Many people view the algal problem as a negative distraction to their river experience.

- Use PG&E releases and coordination as a way to mitigate and actually improve on the South Fork flow and fishery resources.

- Further diminishing the natural free-flowing character of the river is definitely undesirable and should be prevented. Let's not have any further degradation of the ecosystem.

- If possible, let's move toward restoring the ecosystem.

- Are the fluctuations in flows which we see today helping or hurting the fishery? Can we do anything to improve the fishery? These improvements could be mitigation measures.

- Regarding diversion points or ways of diverting water that would be more desirable than others (Interview question #12), the Small Alder Project looks promising because it will provide storage and El Dorado needs more storage. Also, diversions from Folsom seem attractive because pumps exist there now and impacts to the upstream flows and river would be minimized. Thus, pumping from Folsom would seem to be cheaper than some of the upstream alternatives because mitigation, litigation, and other project costs could be avoided.

- Regarding other interest groups to contact, talk to California Outdoors regarding rafting use and flow needs on the river. Also, see the El Dorado County Tax Payers Assn. Ellen Day is a new EID Board member who with the Association.

- Among the agency contacts, be sure and include Rich Silver at State Parks and Dean Swickert at BLM.

Thank you to you and the River Management Advisory Committee for taking the time to discuss the project and offer comments, questions and concerns. If you have further questions, please contact Rick Hanson, EIP Associates Project Manager, or pass them along to Jonas Minton.

Sincerely yours,

Grant D. Werschkull, Associate

american whitewater affiliation

Ms. Susan Scheufele
2121 Ocean St. Ext.
Santa Cruz, CA 95060

October 4, 1994

Grant Werschkill
EIP Associates
1401 21st Street
Sacramento, CA 95814

Dear Mr. Werschkill:

I am writing in response to the Draft Interview Questions on the Central Valley Project Water Service Contract.

Introductory Question:
1. What questions do you have on what we've just described?
My questions are as follows:
1. How much water, in terms of cubic feet per second (cfs) would be removed from the EID and PDPUD proposed diversion locations?
2. How much water would be removed from the South Fork American River by the proposed Texas Hill Storage Alternative and Small Alder Project alternatives?
3. How much water would be removed from the Rubicon River by the proposed diversion on the South Fork of the Rubicon River?
4. Where would the water for the proposed Texas Hill Storage Alternative and Small Alder Project reservoirs come from, only from the Weber Creek and Alder Creek respectively, or from other sources as well?
5. Is the GDPUD proposed diversion point at "Folsom Reservoir north" located on the North Fork American at the old Auburn Dam site, or is it located at the end of the North Fork of the river before the old Auburn Dam site?

Project impacts questions:
2. What potential impacts from the project are you most concerned about?
I am primarily concerned about the impacts of the project on whitewater recreation on the South and Middle Forks of the American River, and also concerned with the impacts of the project on the river ecosystems.

3. What potential impacts from the project are likely to present the most serious problems in terms of moving a project forward?
Any potential impacts on the amounts of water in the South and Middle Forks of the American River are likely to cause the most serious problems in terms of public outcry from the whitewater river recreation user and river conservation community, including protests to the State Water Resources Control Board. This would include both the EID and GDPUD proposed diversion locations above Folsom Reservoir, the proposed Texas Hill Storage and Small Alder Project alternatives, and the proposed diversion via the Robbs Peak diversion on the South Fork of the Rubicon River.

american whitewater affiliation

The South Fork of the American River is the second most popular whitewater run in the Western United States. The North and Middle Forks of the American river are considered suitable for Natural Recreation Area designation, and are also eligible for inclusion in the National Wild and Scenic Rivers system. Recent drought years have restricted boating flows well below each of these river's respective capacities, so any project causing further reductions in flows on these rivers would be considered objectionable. The river flows on the South and Middle Fork American Rivers support whitewater recreation and public navigation, and must be considered a beneficial use and public trust value protected under state law.

4. What do you believe will be the most effective approach for evaluating and accurately estimating these impacts?

I would like to see the EIR/EIS study the existing whitewater recreation revenue flow into the local area, and it's future growth potential under several scenarios. First, the direct and cumulative impacts of unlimited local growth versus the impacts of restricted local growth on the American River. Second, the direct and cumulative impacts of benign neglect of the local river recreation potential versus the impacts of major enhancement of river recreation facilities on the surrounding communities. In other words, evaluate the relationship between the local river resource and the surrounding communities.

The EIR/EIS should explore the quality-of-life impacts for county residents between becoming a high-density suburbanized bedroom community for Sacramento with a benignly neglected but heavily used American River, versus the potential for a lower density community, which retains a rural flavor, and has a highly successful tourist industry built around the well managed South Fork and the Wild and Scenic Middle and North Forks of the American River.

Project mitigation questions:

5. What types of mitigation measures for the adverse impacts of this project should the EIR/EIS analyze?

The EIR/EIS should analyze both facilities and river flows specifically for whitewater recreation. There are many well-known problems with camping, parking, and river access on the South and Middle Forks of the American River, and both rivers could easily accomodate many additional boaters if there were longer releases on the summer weekends as well as reasonable recreational releases during the fall, winter and spring "off-season".

6. Are there other potential desired outcomes that we should consider as potential mitigation related to this project?

South Fork:

It's difficult to find a place to camp on Saturday nights during the summer, as most of the campgrounds are booked up well in advance. Public campgrounds could be developed on the BLM land along the river, as well as at Henningson Park. A reasonably priced shuttle service and/or shuttle buses could help lessen the traffic congestion problems on the local roads. The takeout on both of the Class III runs could be made more efficient and help prevent further riverbank erosion problems with boatramps, at both the Henningson Park takeout and the Salmon Falls Bridge takeout. Improved sanitation facilities could be provided at the put-ins and take-outs. Longer flows on the river would spread the boaters and reduce the perceived impact. Allowing private boaters to exit the Chili Bar run at Marshal Gold State Park would help reduce the congestion on the upper half of the Class II Coloma to Lotus run, a formerly quiet training run for beginning boaters.

Executive Office: P.O. Box 85, Phoenicia, NY 12464
(914) 688-5569

Middle Fork:
There is a lot of public land on the Middle Fork of the American River which has not been developed into camp site areas due to the possible future presence of a new Auburn dam. El Dorado County could make a commitment to protecting the Middle Fork of the American River from future hydro projects and start to develop the recreational potential of the area. More specifically, there is only one place between the put-in and the take-out on the Middle Fork for public vehicle access, and it's at mile 5, inhabited by four or five full summer miner camps, and it's a terrible shuttle to get there from the put-in. The access to Ford's Bar at about the midpoint in the run is an extremely expensive private access. Other access points (a road to the edge of the bluff, and a trail leading to the river from the road, so as to minimize visual impact) along the river could be provided. An access point at Three Queens mine would provide a viable alternative, although a slight step above, to the South Fork American for a one day rafting trip. The Ruck-A-Chucky portage path could be improved and a portage trail around Murderers Bar could be provided. Longer flows which started earlier in the day would allow for more usage of the Class II run.
North Fork:
There is a lot of public land on the North Fork of the American River which has not been developed into camp site areas due to the possible future presence of a new Auburn dam. El Dorado County could make a commitment to protecting the North Fork of the American River from future hydro projects and start to develop the recreational potential of the lower part of the river within the county boundaries. The county could support the Bureau of Reclamation's project to remove the remains of the old Auburn Dam structure and creation a new Class II run in that area. The county could extend the old Auburn dam service road to the takeout for the shuttle for the run, so as to minimize traffic impacts on Hwy 49.

7. What other alternatives should the EIR/EIS analyze for providing a secure water supply?
There are several other water supply sources would should be considered as reasonable alternatives. First, reducing the losses in the El Dorado County water conveyance system, which currently represent 27 percent of the total projected future demand for water. Second, implementing water conservation measures as per the Urban MOU and the Agricultural MOU (when it is available), as well as implementing water recycling. Third, new building growth control limits within the county should also be analyzed as potential alternatives. Fourth, the feasability of purchasing additional water from the Folsom Reservoir water through the Placer County water agancy and/or the state water bank should be analyzed.

Questions about additional suggestions and concerns:
8. Do you have other suggestions which you believe would improve the project and enhance the chances for a project which would be acceptable to your interests?
AWA would not oppose the project if it were to take all of the water from Folsom Reservoir, the El Dorado County water conveyance system was repaired to reduce conveyance losses, and the two water districts sign the Urban MOU and the Agricultural MOU (when it is available).

9. Are there other important obstacles to this project which we have not discussed?
There should be a long-term project to restore the native fisheries on these rivers.

10. Are there other concerns regarding this project which we have not discussed?
Instream flows on the Weber Creek, Alder Creek, and the South Fork of the Rubicon River.

Executive Office: P.O. Box 85, Phoenicia, NY 12464
(914) 688-5569

AWA
american whitewater
american whitewater affiliation

Project definition questions:

11. What part of this project would you change and/or eliminate?

I would eliminate all parts of the project which divert water from on or above the runs on the South and Middle Forks of the American River.

12. Are there diversion points or ways of diverting water that you believe are more acceptable than others? Why?

Diverting water from Folsom Reservoir is the only acceptable diversion point, because of the amount of public recreation on the South Fork, and the special wilderness qualities of the Middle Fork of the American River should be protected. The whitewater flows on these rivers must be considered a beneficial use and public trust value protected under state law.

13. Are there other interest groups and constituencies that we should contact?

I would contact Cal Trout, the Save the American River Association, and conservation groups concerned with the flows into the San Franciso Bay/Delta.

I perceive that El Dorado County and the surrounding counties are at a crux in terms of losing the special character of the Sierra foothills that attracted so many people to the area to begin with, and without growth controls the area will eventually become indistinguishable from the overdeveloped suburban areas of Southern California. In addition, it is inappropriate to continue to slowly erode the quality of the surrounding natural resources in order to build more houses. There is an important relationship between the river resource and the surrounding communities which should be preserved and enhanced.

I would like to reserve the right to make additional comments on this project as more information becomes available. Please contact me if I can be of any further assistance.

Sincerely,

Susan Scheufele

Susan Scheufele
Regional Coordinator, American Whitewater Affiliation
Conservation Chair, Loma Prieta Paddlers, Sierra Club RTS

E I P Associates

Comprehensive Environmental and Planning Services

1001 - 21st Street
Suite 400
Sacramento
CA 95811

916/325-4800
FAX 325-4810

Other Offices:
San Francisco
Los Angeles

November 18, 1994

Joan Villa
Tribal Administrator
Miwok Indian Tribe
Buena Vista Rancheria
24 E Main Street
Ione, CA 95640

SUBJECT: EL DORADO COUNTY WATER AGENCY DIVERSIONS AND PIPELINES

Dear Ms. Villa:

This letter follows some earlier attempts I made at reaching you over the last few months. Please find enclosed a brief description of the project(s) and the list of questions we have used in meeting with interested parties.

Should you feel inclined to respond to any of the interview questions, please mail your comments and/or questions to E.J Koford at EIP Associates, 1401 21st St., Suite 400, Sacramento 95814.

You are now on the mailing list for this project and will be notified of scoping meetings and comment periods for the environmental documents that will be prepared. If you would like to talk with someone about this project you should call E.J. Koford or Rick Hanson at EIP Associates (325-4800) or Jonas Minton, General Manager of the El Dorado County Water Agency.

Sincerely yours,

Grant D. Werschkull, Associate

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1101 - 21st Street
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Sacramento
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FAX 325-4810
Other Offices:
San Francisco
Los Angeles

November 18, 1994

Eric Peach
Preserve American River Canyons
215 Del Monte Way
Auburn, CA 95603

SUBJECT: COMMENTS REGARDING THE EL DORADO COUNTY WATER AGENCY PROPOSED CVP WATER SERVICE CONTRACT

Dear Eric:

This letter follows our telephone conversations over the last few months and confirms your interest in sending in comments on the subject project.

Enclosed is another copy of the abbreviated version of the project description and interview questions. You should direct your comments to these interview questions to either Jonas Minton at the El Dorado County Water Agency or Rick Hanson here at EIP Associates.

The address shown above for PARC will be the address we will use for future EIR/EIS notices unless you advise us otherwise.

Thank you for your interest in this project.

Sincerely yours,

Grant D. Werschkull, Associate

E I P Associates Comprehensive Environmental and Planning Services 1901 - 21st Street Suite 100 Sacramento CA 95814 916/325-4800 FAX 325-4810 *Other Offices:* San Francisco Los Angeles

October 24, 1994

Larry Suddjian
Tevis Cup Ride Director
701 High St., 228 C
Auburn, CA 95603

SUBJECT: FOLLOW-UP TO TELEPHONE CONVERSATION REGARDING EL DORADO COUNTY WATER AGENCY DIVERSIONS AND PIPELINES

Dear Mr. Suddjian:

We talked briefly in August regarding the proposed water development projects. You mentioned that we should keep you on the mailing list, but that you were not able to meet in person at this time.

For your information, I have enclosed a brief description of the project(s) and the list of questions we have used in meeting with interested parties.

In talking with Tony Rossmann and other people associated with the Western States Endurance Run, we have learned that the Tevis Cup is generally scheduled in the latter part of July. It might be helpful to hear from you if you are aware of other organized rides, particularly those that might be in the vicinity of Maine Bar on the Middle Fork of the American.

You are now on the mailing list for this project and will be notified of scoping meetings and comment periods for the environmental documents that will be prepared. In the meantime, it would be appreciated if you could let us know of other rides that may be impacted in any way as a result of the proposed project alternatives.

Thank you for your interest and time.

Sincerely yours,

Grant D. Werschkull, Associate

P.S. Please direct any correspondence and/or calls to Rick Hanson, Project Manager.

October 21, 1994

John Holland
River City Paddlers
4289 Winding Woods Way
Fair Oaks, CA 95628

SUBJECT: EL DORADO COUNTY WATER AGENCY PROPOSED WATER DEVELOPMENT PROJECT

Dear John:

I am sorry you could not make our scheduled interview on the subject project. Enclosed please find a brief description of the project and a list of questions I have been using during the interviews.

I hope you will take a few minutes to review the enclosed material and send any comments that you may have. In as much as you and other paddlers in the Club have paddled so extensively in the watershed, we are particularly interested in your thoughts.

You are now on the mailing list for the proposed project. You will notified of scoping meetings and comment periods for the environmental documents.

Sincerely yours,

Grant D. Werschkull, Associate

P.S. If you have further questions, please direct them to Rick Hanson, EIP Associates Project Manager . . . or Jonas Minton at the El Dorado County Water Agency (621-5392).

E I P Associates

Comprehensive Environmental and Planning Services

1001 - 21st Street
Suite 100
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CA 95811

916/325-1800
FAX 325-1810

Other Offices:
San Francisco
Los Angeles

November 18, 1994

Nate Rangel
California Outdoors
P. O. Box 401
Coloma, CA 95613

SUBJECT: COMMENTS RE EL DORADO COUNTY WATER AGENCY PROJECT

Dear Nate:

This letter follows the numerous telephone calls we exchanged to set up a time to discuss the subject project.

Please find enclosed a brief description of the project and the list of interview questions I have been using. In as much as commercial rafting on the American River is an important economic activity for the foothill communities, I would appreciate it if you could take a few minutes to put some thoughts down regarding the type of impact analysis and presentation of data that will be most helpful to you during the upcoming EIR/EIS process. The interview questions may be helpful to you in framing other suggestions and comments you would like to make.

If you have further questions, you should address them to Rick Hanson, EIP Associates Project Manager or Jonas Minton at the El Dorado County Water Agency.

Thank you for your time and assistance.

Sincerely yours,

Grant D. Werschkull, Associate

- Hourly modeling of flows as a result of proposed diversions will be necessary.

- There is flow data at 15 minute intervals at Chili Bar and Lotus.

- Upstream reservoirs: Since PG&E has already "made peace" with many upstream water rights holders, you expressed concern regarding the problems and implications associated with changing those agreements and operation schedules (and whether or not changes would be acceptable).

- Upstream stakeholders: The Sierra Club Legal Defense Fund/Steve Volker has represented many of the upstream stakeholders in the recent litigation with El Dorado County.

- Diversions below Chili Bar: Since PG&E must provide minimum flow requirements below Chili Bar, other diversions in that stretch would need to be evaluated in the context of the resulting flows and the cumulative upstream impacts related to continued compliance with minimum flow requirements. Since minimum flow requirements are met through releases from upstream storage, El Dorado may need upstream storage (or agreements with those that have it) in order to maintain minimum flow requirements (which would not be met as a result of proposed diversions).

- FERC and minimum flows: PG&E is responsible to FERC for meeting minimum flows requirements and this is a very important matter.

- Power generation: There will likely be power generation impacts with the proposed diversions related to some of the considerations listed above. You explained that SMUD facilities are primarily operated for voltage control but not capacity. (On a wet year, SMUD may switch to more power generation).

- Spill condition: This typically occurs (at White Rock) at flows above 2200 cfs.

- Operations agreement: This would probably be the mechanism for PG&E and El Dorado to work together to reduce adverse impact to fish and other river uses. Once the daily take is established, it would then be timely to begin a more detailed discussion re an operations agreement which could define acceptable timing of the take. Concerns of upstream protestors would have to be resolved as part of this process as well.

- Operations agreement and related mitigation: Power is more valuable than dollars. It may be more desirable to repay/mitigate power generation impacts with power.

- PCWA: A similar discussion is needed with PCWA concerning minimum flows and fish flows. Frank may be interested in attending that meeting.

- Water conservation (gal/per household) and losses in the delivery system: These will be important issues in the environmental/project analysis. Most foothill water agencies have difficulties with these two elements.

- Retrofit toilets: Other communities are installing low-flow toilets as a way to stretch supply.

- Small Alder alternative: This alternative may provide useful opportunities for cooperation with PG&E and the Dept. of Fish and Game (DFG). DFG (J. Mensch) has indicated some interest in an off-stream hatchery. (See testimony before the SWRCB for more insights). Coordinated operations, the El Dorado canal and PG&E relicensing are issues that could be discussed further as part of this alternative.

- 1919 contract: There may be negotiations in the future to bring this contract up to a compensatory level. There are multiple long term issues related to the contract. (See Osgood case in the Supreme Court for further insights).

- 184 License: Relicensing at 2002. In the early years, required minimum flows were 5 cfs. Now they are 50 cfs. More studies will be required and the licensee will be required to complete them. FERC is the licensing authority as specified by the Federal Clean Water Act.

Thank you for taking the time to discuss these issues. If you would like to further comment on any of the above issues, please call Jonas, Marie, or EIP Associate's Project Manager, Rick Hanson.

Sincerely yours,

Grant D. Werschkull, Associate

TASK REPORT:
EL DORADO COUNTY WATER AGENCY
CVP WATER SERVICES CONTRACT PRELIMINARY SCOPING

INTRODUCTION

In August 1994, EIP Associates worked with El Dorado County Water Agency (EDCWA) to develop a list of agencies, organizations and individuals to be contacted as part of a "preliminary scoping process" for EDCWA's Central Valley Project Water Services Contract EIR/EIS. At that time, EIP and EDCWA also collaborated on the development of a list of 13 standard questions to be asked at a series of interviews with the selected parties. These questions were designed to provide useful information about the concerns and expectations of those interviewed regarding the proposed contract and its pending environmental review.

Beginning in September 1994, EIP conducted a series of interviews. Most of these were done in-person with groups sharing common interests. The interviews were organized as follows:

- Fisheries Resource Agencies: California Department of Fish and Game (CDFG), U.S. Fish and Wildlife Service (USFWS), and National Marine Fisheries Service (NMFS)
- PG&E
- El Dorado County Business Community
- Friends of the River/CA Sportfishing Alliance
- American River Land Trust
- El Dorado County Parks and Recreation Division
- Western States Endurance Run
- California Dept. of Boating and Waterways
- El Dorado County Assessor's Office
- El Dorado County River Management Advisory Committee.
- American Whitewater Association (they sent a letter following the interview)

Some interviews were conducted with single individuals or by phone, and in some instances only written responses to EIP's inquiries were received. Follow-up letters were prepared which listed EIP's understanding of the interviewees' responses to the questions posed during the interview.

This Task Report presents a compilation/summary of the results of the preliminary scoping process. To accomplish this, each of the 13 standard questions presented at the interviews is listed below. Each question is followed by pertinent responses (shown as bullet items) given by those interviewed. The group or individual making the response is identified in brackets following each response. This information is supplemented by a number of Attachments to this Task Report. These attachments are presented at the end of this Task Report and include various correspondences related to the interview process.

INTERVIEW QUESTIONS AND RESPONSES

Question 1: What questions do you have on what we've just described?

- What will be the diversion rates and timing at the proposed points of diversion. [CDFG and USFWS]

- What are the proposed survey areas for listed species? [USFWS]

- Diversions: A more detailed description of where diversions might occur and who may be losing the use of the water El Dorado proposes to divert was requested. [PG&E]

- How much water in terms of cubic feet per second would be removed from the EID and GDPUD proposed diversion locations? [American Whitewater Affiliation]

- How much water would be removed from the South Fork American River by the proposed Texas Hill Storage and Small Alder Alternatives? [American Whitewater Affiliation]

- How much water would be removed from the Rubicon River by the proposed diversion on the South Fork of the Rubicon? [American Whitewater Affiliation]

- Where would the water for the proposed Texas Hill Storage Alternative and Small Alder Project reservoirs come from, only from the Weber Creek and Alder Creek or from other sources? [American Whitewater Affiliation]

- Is the GDPUD proposed diversion point at "Folsom Reservoir North" located on the North Fork of the American at the old Auburn Dam site, or is it at the end of the North Fork of the river before the old Auburn Dam site?[American Whitewater Affiliation]

- What volume of the acre-feet would be diverted at what time and what would that be in terms of cfs? [California Sportfishing Alliance/ Friends of the River]

- The division of who gets what water is important because it guides where the diversions are. Georgetown, of course is interested in diverting out of the Middle Fork and possibly the South Fork whereas El Dorado County Water Agency is interested in diverting out of the South Fork. [California Sportfishing Alliance/ Friends of the River]

- Will there be a difference in water purification costs for water diverted above Chili Bar as compared to Folsom Reservoir? [County River Management Advisory Committee Parks and Recreation Division]

- How many homes could be served by the 15,000 acre feet? [County River Management Advisory Committee Parks and Recreation Division]

- To better understand potential impacts, it would be important to precisely define the location of pipelines, provide a picture or drawing illustrating the size and location of the staged pumps, and provide specific dates for the start and completion of construction. [Western States Endurance Run]

Project impacts questions:

Question 2. What potential impacts from the project are you most concerned about?

- The proposed diversion will change the operational flexibility of Folsom Reservoir and will place additional burden on other CVP facilities to meet project requirements. [USFWS]

- A portion of Reclamation's water rights will be reallocated and delivered to a new place of use. [USFWS]

- Less water will be available for Folsom's carry-over storage and other CVP purposes. [USFWS]

- The proposed diversions will incrementally increase on-going fish and wildlife impacts downstream of Folsom Reservoir and could lead to additional terrestrial wildlife habitat conversions. [USFWS]

- Endangered Species Act issues below Folsom Reservoir are of concern. A planning aide letter exists concerning this which will be provided to EDCWA. [USFWS]

- Site specific impacts on fisheries and growth- related issues are of concern. [CDFG]

- It is uncertain whether or not IFIM is needed for analysis for alternatives 6 & 7. [CDFG]

- Regarding operation of PG&E facilities and related potential impacts and concerns from above Folsom diversions, the EIR should carefully review PG&E's testimony before the SWRCB to better understand potential impacts and issues. [PG&E]

- Power generation: There will likely be power generation impacts with the proposed diversions SMUD facilities are primarily operated for voltage control but not capacity. On a wet year, SMUD may switch to more power generation. [PG&E]

- Fisheries impacts from the diversions for the entire watershed are of concern. [American River Land Trust]

- Growth inducement and resulting impacts if there is growth (such as air quality , commercial timber if air quality deteriorates, and impacts to native habitats) are of concern. [American River Land Trust]

- Downstream economic impacts on already established economies will occur during drought periods if El Dorado is able to divert water.[American River Land Trust]

- Concern exists about exceeding the carrying capacity of county. [American River Land Trust]

- Concern that scientists suggest the longer term view of precipitation (over the last few thousand years) indicates that longer drought periods are more typical of this region. [American River Land Trust]

- Secondary impacts and cumulative impacts may appear with a decreasing resource base. [American River Land Trust]

- Impacts may occur on the valuation of land and the tax base. Water is the main factor along with land development that can influence land value. [El Dorado County Assessor's Office]

- Water availability could increase the workload for the Assessor's Office. Particularly note that west-side revaluations could dramatically increase. [El Dorado County Assessor's Office]

- Impacts of the project on whitewater recreation on the South and Middle forks of the American may occur. [American Whitewater Affiliation]

- Impacts of the project on river ecosystems is a concern. [American Whitewater Affiliation]

- From diversions from the Middle Fork, Friends of the River would be concerned about impacts on the wild and scenic river potential of the Middle Fork which is a river that has been determined to be eligible for national wild and scenic river status and under federal guidelines is to be managed to protect those values until Congress decides as to whether it should be added to wild and scenic system. Diversions on the Middle Fork could affect the river's outstanding recreation values fishery values, ecological values, and historic/cultural values and that would be an issue that must, by Federal law, be analyzed in any kind of environmental documentation. [California Sportfishing Alliance/ Friends of the River]

- Minor diversion of the South Fork could marginalize the recreational values of that river in ways not only of environmental and aesthetic concerns, but public safety concerns in regards to reducing the viability of that river as a boating river for white water recreation. [California Sportfishing Alliance/ Friends of the River]

- The physical impacts of the diversion are of concern. Is the dam being considered? If so, a small dam, a large dam, or are you talking about somebody sticking a straw in the gravel, which has far less impacts from our point of view in terms of the immediate physical setting. [California Sportfishing Alliance/ Friends of the River]

- Impacts on river flows including the volume of diversions, the duration of those diversions, and the time of day that diversion occurs should be addressed. [El Dorado County Parks and Recreation Division]

- Secondary visual impacts that may be visible from the river and from other recreation use areas such as trails, camping areas, and overlooks should be addressed. [El Dorado County Parks and Recreation Division]

- Impacts on water quality are a concern. Many comments from visitors are heard regarding the algae on the South Fork. Some have suggested that this is due to the fact that South Fork flows are "down" for long periods which results in warmer flows that are more conducive to algae. [El Dorado County Parks and Recreation Division]

- Impacts on commercial and private rafting and whitewater activity could occur. [El Dorado County Parks and Recreation Division]

- Resulting economic impacts if flows will be diminished to the point of influencing private and commercial use are a concern. Correspondingly, if flows can be altered to improve private and recreational use, perhaps this should be evaluated, too.[El Dorado County Parks and Recreation Division]

- See the 1984 EIR and River Management Plan.[El Dorado County Parks and Recreation Division]

- See Jim Testa (California Dept. of Parks and Recreation) regarding economic impacts related to commercial and private recreation activity on the South Fork. [El Dorado County Parks and Recreation Division]

- Will there be a complete evaluation of what a true water shortage might mean to El Dorado County? This means a water shortage/drought of the type depicted recently in the Sacramento Bee which provided scientific evidence to suggest that droughts have lasted many decades. [County River Management Advisory Committee Parks and Recreation Division]

- Further diminishing the natural free-flowing character of the river is undesirable and should be prevented. Let's not have any further degradation of the ecosystem. [County River Management Advisory Committee Parks and Recreation Division]

Question 3. What potential impacts from the project are likely to present the most serious problems in terms of moving a project forward?

- FERC and minimum flows: PG&E is responsible to FERC for meeting minimum flows requirements and this is a very important matter. [PG&E]

- Costs of infrastructure within a rural economy, particularly with wastewater treatment. [American River Land Trust]

- Impacts related to irreversible commitment to future development due to the need to finance infrastructure. [American River Land Trust]

- Concerning air quality impacts, the Sacramento basin has already exceeded ozone standards.[American River Land Trust]

- Inability of the Federal government to assist with needed infrastructure due to Federal deficits and constrained spending.[American River Land Trust]

- Social impacts and conditions associated with the larger urban area El Dorado would become with this water will be a burden and will be unattractive to existing residents.[American River Land Trust]

- Outdoor recreation is a $35 billion/year industry in California and rivers are second largest draw. River recreation has grown 2000% since 1970 and there are 120,000 recreation visits to the South Fork American each year with an economic impact of approximately $30 million contribution to El Dorado County. With this in mind, it is recommended that there be no additional water withdrawals from the North, Middle and South Forks.[Dept. of Boating and Waterways]

- Real concerns exist regarding growth being approved without the water and infrastructure to support it.[Dept. of Boating and Waterways]

- Political posturing and financing may keep this project from moving forward. Will the County be aggressive in pursuing this water?[El Dorado County Assessor's Office]

- Any potential impacts on the amounts of water in the South and Middle Forks of the American River are likely to cause the most serious problems in terms of public outcry from the whitewater river recreation user and river conservation community, including protests to the State Water Resources Control Board.[American Whitewater Affiliation]

- Any project causing future reductions in flows on the South and Middle forks of the American would be considered objectionable. These flows support whitewater recreation and public navigation, and must be considered a beneficial use and public trust value protected under state law.[American Whitewater Affiliation]

- The lower on the river (or reservoir) you divert, the more likely you are going to incur pumping costs since you will not be able to utilize gravity in the delivery system. [Business Community]

- From the perspective of the California Sportfishing Protection Alliance, the diversion points are important -- what kind of diversions are going to be diverted out of each diversion point

– how that's going to effect fishery flows, whether fishery flows are going to continue to be what they are now or if it's going to be over and above that. The other aspect of this is how is it going to affect downstream users and fishery flows, including endangered species and indigenous species. There needs to be a cumulative effect study to determine how much water -- the total amount of water diverted if a project goes through, or 2 projects or 3 projects because there's a significant cumulative effect of all these projects. [California Sportfishing Alliance/ Friends of the River]

- Perhaps a watershed-wide analysis of future conditions is needed? The environmental analysis has to look at the likely foreseeable changes in how the watershed is managed. For example, on the South Fork these water diversions are fairly small potatoes compared to how – or what SMUD and PG&E do with the water on the South Fork and when those SMUD and PG&E hydro projects are up for re-licensing. It's going to rearrange the whole water scape in terms of what better flows do we need for fisheries, whether there are going to be flows for recreation versus how much water we are going to take out of the river, where we're going to take that water out. This issue must be looked at into the future in terms of how these projects fit into that future scenario of, rearranging the water rights on the river, especially with these large projects which are the primary generator of how the river flows are managed right now. [California Sportfishing Alliance/ Friends of the River]

- If flows are altered, and there are impacts on the commercial rafting interests, then this would probably be one of the most serious concerns. [El Dorado County Parks and Recreation Division]

- If the altered flows could be beneficial to river users, then commercial rafting interests may be useful in advancing the project. [El Dorado County Parks and Recreation Division]

- If algae increases, the parties that pump water from the river may be impacted. [El Dorado County Parks and Recreation Division]

- The Maine Bar diversion has the greatest potential to impact the Tevis Cup (equestrian) and 100 Mile Endurance Run because the proposed pipeline would be in the immediate vicinity of the trails used for those events. [Western States Endurance Run]

- In general, potential impacts would seem to include visual (pipeline, pumps, construction related) and construction related impacts that might interfere with a run or ride. [Western States Endurance Run]

- Regarding visual impacts, it would probably be preferable to have a pipeline cross a trail than a pipeline parallel a trail. [Western States Endurance Run]

Question 4. What do you believe will be the most effective approach for evaluating and accurately estimating these impacts?

- The project should include a Habitat Management Plan as part of the mitigation for growth inducing impacts. [CDFG]

- Models of the system at and below Folsom Reservoir and effects on outflow water temperature, Delta salinity changes, effects on endangered species, and effects on recreational opportunities must be included in the EIS. [USFWS]

- For assessing potential impacts of diversions from the Folsom North site, it is estimated that, in 2030, the diversion rate will be 17 cfs, approximately. CDFG recognizes that PCWA, to an extent, controls flows through releases at their Oxbow power plant on the Middle Fork. If EDCWA proposes as part of the project description that new flows downstream of the diversion site would not be affected, CDFG would not require Instream Flow Incremental Methodology (IFIM) studies. This would be contingent on demonstrating that the diversion would not impact minimum flows and that releases upstream of the diversion point would be made consistent with downstream diversions. These same conditions would apply for diversions on the South and Middle Forks. [CDFG]

- The EIS' cumulative impact section should combine all proposed new interim contract quantities and any other foreseeable American River water rights changes into a single analysis. [USFWS]

- Harmonious operations within the watershed should be emphasized. [PG&E]

- Proposed diversion information: Information about 1) how much water and 2) when the water would be diverted including the season of diversion and the time of day will be critical information for adequate analysis and evaluation of proposed diversions.[PG&E]

- Hourly modeling of flows as a result of proposed diversions will be necessary. There is flow data at 15 minute intervals at Chili Bar and Lotus.[PG&E]

- Do a cost benefit analysis of delivery of the subject water to an existing metropolitan area with existing municipal and industrial infrastructure vs. building new infrastructure and development in an area such as El Dorado.[American River Land Trust]

- More information is needed regarding how diversions will affect recreation. [Dept. of Boating and Waterways]

- The Department would probably not be supportive of diversions during summer months.[Dept. of Boating and Waterways]

- The EIR should address recreation revenue flow into the project area and its future growth under several scenarios. The EIR should evaluate the relationship between the local river resource and surrounding communities. [American Whitewater Affiliation]

- Avoid having too many program EIR components because the resulting environmental document may be lacking in the specificity to soundly provide a basis for answering questions and concerns. Make the analysis more comprehensive and it will save time and effort in the long run.[Business Community]

- PG&E and SMUD operational issues and problems are of concern. These issues must be addressed. And in the context of the last point, the project and the resulting impacts must be defined with sufficient specificity so that PG&E operational issues/problems can be identified and addressed. The State Water Resources Control Board made if very clear that if operational agreements will be necessary for this project, then the agreements or the essence of them should be included in the environmental document.[Business Community]

- Regarding where water will be used and County water needs: look at the work of EID and CH2M Hill which expands on what is presented in the general plan. Also, EID has a very thorough reclaimed water master plan which includes many aspects of water conservation. [Business Community]

- Interviewing the stakeholders to identify issues is good but as we get further along when you actually have a project to propose, and have answered some of these questions, it is very important to have a public meeting – but not these giant public meetings where people have an opportunity to get out there and make a statement for three minutes and then sit down -- but perhaps smaller meetings that include groups of stakeholders. Instead of relying on California Outdoors and American Whitewater Affiliation to represent "the boating community" maybe hold a public meeting for the boating community so that boaters as a whole can understand what this project means for them and state their opinions on it. People in Georgetown and Kelsey probably would like to have a meeting in their area so they can discuss the pros and cons of what this means for growth for their community. There are going to be polarized feelings. It's important that those people -- those groups of stakeholders be given an opportunity to look at one aspect of this project rather than through some giant public meetings. So public outreach and education are keys to a successful approach. [California Sportfishing Alliance/ Friends of the River]

- There needs to be an accurate assessment of current river-related use and how that use is tied to the existing flow regime. (There have been suggestions made to the Parks and Recreation Division about how flows could be change to improve recreation use on the river and "spread-out" what are often crowded and congested conditions). [El Dorado County Parks and Recreation Division]

Project mitigation questions:

Question 5. What types of mitigation measures for the adverse impacts of this project should the EIR/EIS analyze?

- Avoidance and mitigation recommendations for on-going impacts of the CVP are found in the USFWS's March 1992 Draft Fish and Wildlife Coordination Act Report. [USFWS]
- A Habitat Conservation Plan (HCP) should be developed under Section 7 and 10, using Endangered Species Act guidance. [USFWS]
- All diversions must be screened. [CDFG]
- Examine possible seasonal or diurnal diversion limits to avoid a "take" of listed species. [CDFG]
- Mitigation banking for each affected listed species should be considered. [USFWS]
- CDFG would like to see an HCP, the more species incorporated, the better. [CDFG]
- Operations agreement and related mitigation: power is more valuable than dollars. It may be more desirable to repay/mitigate power generation impacts with power..[PG&E]
- Retrofit toilets: Other communities are installing low-flow toilets as a way to stretch supply.[PG&E]
- Reducing mobile and point sources of air pollution and other costs associated with improving air quality.[American River Land Trust]
- Purchase of additional easements along rivers and streams for habitat protection and restoration as well as recreational use.[American River Land Trust]
- Set-up a habitat acquisition program funded by an enhancement fee (per gallons or acre foot) of El Dorado County water use and sales.[American River Land Trust]
- Set-up a similar program to serve other important conservation purposes including air quality (source control and removal).[American River Land Trust]
- Better access and portage trail at the Ruck-a-chucky rapid on the Middle Fork is needed. There are safety concerns at this location and thousands of people pass through this area each year.[Dept. of Boating and Waterways]
- Analyze both the facilities and river flows that accommodate whitewater recreation. [American Whitewater Affiliation]

- There needs to be a way to evaluate the legitimacy of comments from entities that may not be sincere in their contributions to the environmental process. Environmental laws require mitigation for legitimate environmental impacts, but we are concerned about people that will try to make this project unaffordable as a way to control growth. [Business Community]

- At the minimum, residential water users should adopt the principles of the urban water MOU and also adopt a policy that they will improve those best management practices as they are revised and adopted by the other sides of the MOU. Both in water and energy, demand side management is the key to reducing the need for further diversions. [California Sportfishing Alliance/ Friends of the River]

- Long term protection/management should be considered as mitigation: If the project proponents are able to withdraw water and provide adequate mitigation for the local and direct impacts, then there should be serious consideration to this project incorporating wild and scenic river designations and/or a NRA to offset cumulative impacts. This would help to address the concerns of the many public interest and regulatory agencies which worry that this project will simply continue the degradation of the river ecosystem. Commitment on the part of the El Dorado County Water Agency to take the necessary political and policy steps to secure this type of protection would give confidence to public interests that El Dorado is a dedicated partner in long term stewardship of river resources. [California Sportfishing Alliance/ Friends of the River]

- How can safety be improved and advanced for the thousands of annual visitors to these river corridors? These would be good mitigation measures. [El Dorado County Parks and Recreation Division]

- How can this project relieve the congestion on the river. This could also improve the quality of their experience. [El Dorado County Parks and Recreation Division]

- Improved access: possible options for improved access include 1) better access to the Class II section below Troublemaker rapid; 2) a take-out for those rafters/paddlers completing the run above this Class II section (so they do not create congestion for people on the Class II section); 3) an access between Camp Lotus and the Gorge section of the lower run (if the Convict Rock diversion point is used, there could be an access created there). [El Dorado County Parks and Recreation Division]

- Restoration of Auburn dam site and restoring river recreation to that reach of the American River could relieve some of the pressure on other runs, such as the South Fork. [El Dorado County Parks and Recreation Division]

- Impacts on the aquatic ecosystem should be fully evaluated. [County River Management Advisory Committee Parks and Recreation Division]

- Use PG&E releases and coordination as a way to mitigate and actually improve on the South Fork flow and fishery resources. [County River Management Advisory Committee Parks and Recreation Division]

- If possible, move toward restoring the ecosystem. [County River Management Advisory Committee Parks and Recreation Division]

Question 6. Are there other potential desired outcomes that we should consider as potential mitigation related to this project?

- Water conservation (gal/per household) and losses in the delivery system: These will be important issues in the environmental/project analysis. Most foothill water agencies have difficulties with these two elements.[PG&E]

- Geographic location of development to correspond with lower elevation diversion points.[American River Land Trust]

- The development of public campgrounds, takeouts and other amenities designed to accommodate recreational use of the South, Middle and North Forks. [American Whitewater Affiliation]

- Removal of the remains of the old Auburn Dam structure and creation of a new Class II whitewater run in the area. [American Whitewater Affiliation]

- The project must have a very comprehensive analysis of costs (both direct project as well as mitigation costs) and a complete discussion of how the project would be funded if approved. [Business Community]

- Diversion from the Auburn Dam site that could lead to potential restoration should really be looked into.[California Sportfishing Alliance/ Friends of the River]

- Any diversions should not result in a change in the free-form character of the river. The straw in the gravel approach is much more acceptable than the dams and diversions. [California Sportfishing Alliance/ Friends of the River]

- Better access points to some of the river might be in order -- access is limited and gets more restricted all the time for both boaters and fishermen. Some concern and some improvement for access issue is justified. [California Sportfishing Alliance/ Friends of the River]

- From the cumulative impact view of growth, the use of reclaimed water shall be considered. Reclaimed water can be used on golf courses and so much more. [California Sportfishing Alliance/ Friends of the River]

- Work with PG&E and other operators and the regulatory agencies to have flows (negotiate agreements) that serve the dual purpose of meeting both fish and recreation needs. This could be developed as a mitigation. An example might be to reduce some of the night flows so as to provide more day time flow when recreational use is highest. [El Dorado County Parks and Recreation Division]

- Certainty of flow is important to outfitters and other people that may travel long distances to float and/or fish the South Fork. Improving flow certainty is another potential mitigation.

- It would be useful, if as part of this study there could be an evaluation of what truly constitutes an "optimum flow" from the perspective of recreation interests. This study and analysis would provide an important benchmark for the Parks and Recreation Division and other entities concerned about impacts to American River recreation. [El Dorado County Parks and Recreation Division

- Regarding mitigation and potential improvements that might be useful to trail use, some type of water spigot might be helpful since drinking water is always a need on the trails.[Western States Endurance Run]

- The concept of a pumping facility at the Auburn Dam site coupled with restoration of the river channel should be pursued. [Western States Endurance Run]

Question 7. What other alternatives should the EIR/EIS analyze for providing a secure water supply?

- Other alternatives should consider Kyburz Canal/ Hazel Creek tunnel, if it comes through. [CDFG]

- Analyzing both non-Fazio water alternatives and Fazio water alternatives, may become too complicated and convoluted. If there is a roadblock on one of the water sources, all will be stalled because they are in the same EIR. Because the objective of the project is to obtain CVP water under PL 101-514, addressing non-CVP water alternatives is likely unnecessary. [CDFG]

- Small Alder alternative: This alternative may provide useful opportunities for cooperation with PG&E and the Dept. of Fish and Game (DFG). DFG has indicated some interest in an off-stream hatchery. (See testimony before the SWRCB for more insights). Coordinated operations, the El Dorado canal and PG&E relicensing are issues that could be discussed further as part of this alternative.[PG&E]

- Reduce residential densities within the general plan.[American River Land Trust]

- Maintain agricultural zones (seek broader application of the Williamson Act).[American River Land Trust]

- Reduce the land base for development.[American River Land Trust]

- There are several other water supply sources that should be considered as reasonable alternatives. First, reducing the losses in the El Dorado County water conveyance system. Second, implementing water conservation measures per the Urban MOU and Agricultural MOU. Third, establish new building growth control limits, and fourth, study the feasibility of purchasing additional water through PCWA.[American Whitewater Affiliation]

- There should be consideration of more fully using Sly Park as a storage facility to serve County needs. If more could be water made available for storage in that reservoir then the firm yield could be increased because capacity exists. Other than the diversion impacts and issues of where water would be secured for storage in Sly Park, other impacts would be minor if any because the reservoir is already constructed.[Business Community]

- Regarding Folsom Reservoir as a diversion location: This project should evaluate the capability and capacity of the El Dorado Hills treatment plant. Be aware that the existing plant is located in the middle of expensive homes and is in proximity to a school. Alternate treatment plant locations as well as the conveyance pipelines will have to be identified and evaluated. [Business Community]

- Water marketing -- Placer County Water Agency fairly routinely sells surplus water to downstream users. Why shouldn't Georgetown or El Dorado County be able to purchase that water and perhaps divert it right at Folsom Reservoir.[California Sportfishing Alliance/ Friends of the River]

Questions about additional suggestions and concerns:

Question 8. Do you have other suggestions which you believe would improve the project and enhance the chances for a project that would be acceptable to your interests?

- The USFWS recognizes that the CVPIA authorizes a long-term contract, but EDCWA's long-term need must be reevaluated from the perspective of the CVPIA. USFWS recommends that:

  1. All existing and new diversion points shall be screened.

  2. Immediate water needs should be substantiated and reasonable water conservation opportunities identified for all service areas.

  3. A County-wide water needs analysis should be conducted.

  4. EDCWA should enter into "interim" water service contracts for an adjustable water quantity, not to exceed 15,000 AF, and incorporate all CVPIA contract provision requirements into the new contracts.

5. Implement the recommendations from the 1992 FWCA report for the Folsom Dam and Reservoir Temporary Reoperation Study. [USFWS]

- The EIR should recognize that the project is predicated on growth. [USFWS]

- Construction impacts must be considered. [CDFG]

- An erosion control plan is needed. [CDFG]

- Category 1 and 2 species should be assessed. There are 32 special status species in the county. Alternatives 4 and 8 particularly have concerns for foothill and mountain yellow legged frog. The USBR has a list of applicable species. [USFWS]

- Operations agreement: This would probably be the mechanism for PG&E and El Dorado to work together to reduce adverse impact to fish and other river uses. Once the daily take is established, it would then be timely to begin a more detailed discussion re an operations agreement which could define acceptable timing of the take. Concerns of upstream protestors would have to be resolved as part of this process as well.

- Maintaining biological diversity and a healthy resource base in the Sierra Nevada.[American River Land Trust]

- A middle-ground project which is advanced through the environmental and regulatory process in a logical and professional manner will have the best chance of success. The project must be realistic.[El Dorado County Assessor's Office]

- The American Whitewater Affiliation would not oppose the project if it were to take all its water from Folsom Reservoir, the El Dorado County water conveyance system was repaired to reduce conveyance losses, and the two water districts sign the Urban MOU and the Agricultural MOU (when available).[American Whitewater Affiliation]

- There may be a need for the entire watershed to be adjudicated. This could provide a more realistic approach to understanding all the projects and the water rights that exist now and are being proposed. [California Sportfishing Alliance/ Friends of the River]

Question 9. Are there other important obstacles to this project which we have not discussed?

- Upstream reservoirs: Since PG&E has already "made peace" with many upstream water rights holders, PG&E expressed concern regarding the problems and implications associated with changing those agreements and operation schedules (and whether or not changes would be acceptable).[PG&E]

- Maintaining biological diversity and a healthy resource base in the Sierra Nevada and other secondary impacts.[American River Land Trust]

- The biggest obstacles are political. There are no growth advocates and residents that would like to see El Dorado stay as it is today.[El Dorado County Assessor's Office]

- In terms of the use and development of land, Mello Roos bonding and the confidence level of investors is important.[El Dorado County Assessor's Office]

- There should be a long-term plan for the restoration of native fisheries in the North, Middle and South Forks.

- Will the El Dorado County Water Agency be seeking additional appropriations within the watershed? "Change petitions" will probably be required for any changes to existing appropriations. The State Water Resources Control Board should be consulted about how to structure and approach any new appropriations.[California Sportfishing Alliance/ Friends of the River]

- If water is made more available then there will probably be increased traffic, air quality and related environmental impacts along with growth. (An example was made of the air quality problems now occurring in Kings Canyon National Park as a result of urban air quality deterioration in neighboring Valley areas). Since a major part of western El Dorado's tourism is linked to river recreation, a concern is how will increased growth influence and/or degrade these recreational experiences? [El Dorado County Parks and Recreation Division]

Question 10. Do you have other concerns regarding this project which we have not discussed?

- Project 184 License: Relicensing at 2002. In the early years, required minimum flows were 5 cfs. Now they are 50 cfs. More studies will be required and the licensee will be required to complete them. FERC is the licensing authority as specified by the Federal Clean Water Act. [PG&E]

- Instream flows in Weber Creek, Alder Creek, and the South Fork of the Rubicon. [American Whitewater Affiliation]

- There are some "conditions" on the El Dorado Hills treatment plant as a result of previous agreements with the City of Sacramento. It will be important for the environmental documents associated with this project to reference those conditions and to address any requirements that may limit the expanded use of the Plant. (Jonas). [Business Community]

- A "forum process" similar to what is being advanced in Sacramento could be useful at some point in El Dorado. [Business Community]

- Regarding uncertainty: how secure will the Bureau of Reclamation water be? If the trend of increased CVP deliveries for fish and wildlife continues in the future, how will the water for this project be influenced?[Business Community]

- The subject of water rates will be a political issue in the future. It is not unusual to see EID water bills in excess of $150 (for a two month period). There are limits and ultimate price sensitivities to what people will be willing to pay for water. Maybe the environmental document should look at what has happened in other areas and water districts. There are instances of where water has been priced so high that demand dropped precipitously and therefore threatened the financial solvency of the water district. [Business Community]

- The projections for agricultural water needs in El Dorado County should be critically reviewed (projections may be too high). As we've seen in other parts of the State, where there are subsidies for agricultural water coupled with increasing rates for all water customers, there will undoubtedly be increased scrutiny of the agricultural subsidies. [Business Community]

- Several specific plans are underway in the County. These specific plans should be useful in providing better insight to growth related water demand. [Business Community]

- Seriously reconsider the need for this project. Continued growth and the resulting impacts from diversions on California's already seriously compromised river and stream resource ecosystems is a concern. It is a mistake to look first to further water development rather than to more creative and dedicated water management. [California Sportfishing Alliance/ Friends of the River]

- Further diversions from the American River system, impacts within the watershed and over-commitment of the CVP to non-environmental uses are a sources of concern. Historically, the environment and the river ecosystem including fish has taken a backseat to water development. It is hoped this trend can be reversed. The CVPIA is seen be a step in the right direction. This effort should not be compromised in any way: the CVPIA and restoration that is envisioned as part of CVPIA. [California Sportfishing Alliance/ Friends of the River]

- Run dates include the June Endurance Run and the Cool Canyon Crawl in mid-March. [Western States Endurance Run]

- The Tevis Cup is generally scheduled towards the end of July.[Western States Endurance Run]

- A Barbara Schoener memorial bench may be placed along a stretch of the trail near the proposed diversion and pipeline. [Western States Endurance Run]

- Prolific wildflowers occur along the stretch of the Western States Endurance Run trail near the Knickerbocker Creek diversion alternative.[Western States Endurance Run]

- Where is the water supply need that will have to be served? [County River Management Advisory Committee Parks and Recreation Division]

- What about pumping costs from the diversion locations to these parts of the County that will most need the water? It seems that if the need is in the western part of the County, then the obvious diversion location is from Folsom Reservoir. There does not seem to be as much growth in other parts of the County. [County River Management Advisory Committee Parks and Recreation Division]

- People need to be able to see the true cost of this project. Make the comparisons understandable. For example, pennies per gallon might be a usable and familiar unit. [County River Management Advisory Committee Parks and Recreation Division]

- How does EID plan to handle the many homes that are not presently served by the utility, but are instead served by wells? Coloma is not completely served by EID. [County River Management Advisory Committee Parks and Recreation Division]

- There needs to be a comprehensive evaluation of costs to El Dorado county residents. [County River Management Advisory Committee Parks and Recreation Division]

- Water quality is a real concern which will influence cost. [County River Management Advisory Committee Parks and Recreation Division]

- A major concern is post project flows and if these flows will provide for continued commercial and private rafting on the river. [County River Management Advisory Committee Parks and Recreation Division]

- There will be fewer hours of "boatable flows" on the South Fork. Since there is already congestion on the river, fewer boatable hours per day will mean significant congestion problems. [County River Management Advisory Committee Parks and Recreation Division]

- If there is a way to reduce the algae in the river, this should be considered as a type of mitigation measure. Many people view the algal problem as a negative distraction to their river experience. [County River Management Advisory Committee Parks and Recreation Division]

- Are the fluctuations in flows which we see today helping or hurting the fishery? Can we do anything to improve the fishery? These improvements could be mitigation measures. [County River Management Advisory Committee Parks and Recreation Division]

- Agreements and senior water rights: It was discussed that for any proposed diversion there would also need to be agreements with PG&E or other senior water rights holders in order to actually implement a diversion. For example, PG&E relinquishes water rights below Chili Bar but could nonetheless be impacted from proposed diversions downstream. [PG&E]

Project definition questions:

Question 11. What part of this project would you change and/or eliminate?

- All parts of the project which diver water on or above the South, Middle or North Forks of the American River. [American Whitewater Affiliation]

Question 12. Are there diversion points or ways of diverting water that you believe are more desirable than others? Why?

- Above Folsom Reservoir diversions: PG&E suggested that there is more likelihood of protests as diversions are proposed further above the Reservoir.[PG&E]

- Use lower elevation diversions and use existing diversion points.[American River Land Trust]

- If there are legitimate needs for diversions, and these diversions are based on good planning and sound project approval, then Folsom Reservoir would be a likely diversion point.[Dept. of Boating and Waterways]

- There should be more exploration of flatwater opportunities (reservoir creation) for capturing water.[El Dorado County Assessor's Office]

- Diverting water from Folsom Reservoir is the only acceptable diversion point. [American Whitewater Affiliation]

- The lowest diversion point is best because it leaves the water in the river for the longest possible amount of time. [California Sportfishing Alliance/ Friends of the River]

- Probably diverting at Folsom Reservoir would eliminate some of the problems we have outlined for previous questions. [El Dorado County Parks and Recreation Division]

- Regarding diversion points or ways of diverting water that would be more desirable than others (Interview question #12), the Small Alder Project looks promising because it will provide storage and El Dorado needs more storage. Also, diversions from Folsom seem attractive because pumps exist there now and impacts to the upstream flows and river would be minimized. Thus, pumping from Folsom would seem to be cheaper than some of the upstream alternatives because mitigation, litigation, and other project costs could be avoided. [County River Management Advisory Committee Parks and Recreation Division]

Question 13. Are there other interest groups and constituencies that we should contact?

- Consider contacting Westland Water District. [CDFG and USFWS]

- Upstream stakeholders: The Sierra Club Legal Defense Fund/Steve Volker has represented many of the upstream stakeholders in the recent litigation with El Dorado County.

- Other contacts are Nate Rangel/California Outdoors, Rich Silver/California Dept. of Parks and Recreation at the Auburn State Recreation Area, and Diana Erickson with the U.S. Forest Service/El Dorado National Forest. Charlie Willard may be a contact for others.[Dept. of Boating and Waterways]

- Downstream users [American River Land Trust]

- There are individuals and interests that will do everything in their power to stumble and prevent further water development for the County. In the Lake Tahoe Myers Flat area, there were individuals that declined opportunities to participate and later attempted to block the project.[El Dorado County Assessor's Office]

- Cal Trout, the Save the American River Association, and conservation groups concerned with the flows into the San Francisco Bay/Delta. [American Whitewater Affiliation]

- FAWN/Karen Schamback in Georgetown • PCFFA/Zeke Grader • United Anglers/John Beuttler • Striped Bass Assn.• American Whitewater Assn/Susan Scheufele • Re proposed Maine Bar diversion • Tevis Cup representatives. [California Sportfishing Alliance/ Friends of the River]

- landowners, particularly along the South Fork should be contacted. [El Dorado County Parks and Recreation Division]

- Regarding other interest groups to contact, talk to California Outdoors regarding rafting use and flow needs on the river. Also, see the El Dorado County Tax Payers Assn. Ellen Day is a new EID Board member who with the Association. [County River Management Advisory Committee Parks and Recreation Division]

- Rich Silver at State Parks and Dean Swickert at BLM. [County River Management Advisory Committee Parks and Recreation Division]

INTERVIEW FOLLOW-UP

At the request of EDCWA, EIP recently contacted each party or group that was originally interviewed as part of the preliminary scoping process. The purpose of these contacts was to see if any of the parties wished to offer new input or revise their previous comments. As the last interviews were held in early 1995, each of the parties contacted requested the opportunity to refamiliarize themselves with the project before offering any comments. EIP subsequently sent each of those contacted a copy of the general project description and a copy of the 1995 follow-up letter regarding their initial interview.

To date, EIP has not received any additional comments from the interviewees. EIP will forward any such comments to EDCWA as they are received.

In addition, EDCWA has requested that EIP contact other parties that were not originally interviewed. These include the El Dorado County Planning Department, SMUD, Westland Water District and Save the American River Association. Again, the results of these inquiries will be forwarded to EDCWA as soon as they are received.

ATTACHMENTS

To supplement the interview responses summarized above, this report includes several attachments arranged in chronological order. These are:

1. February 28, 1994 letter from the USFWS Ecological Services Sacramento Field Office.

2. October 4, 1994 letter from the American Whitewater Affiliation.

3. November 23, 1994 memo from E.J. Koford (EIP) to Jonas Minton (EDCWA).

4. January 26, 1995 memo from E.J. Koford to Rod Hall (US Bureau of Reclamation).

5. February 10, 1995 draft memo to file from E.J. Koford.

ATTACHMENTS

Ecological Services
Sacramento Field Office
2800 Cottage Way, Room E-1803
Sacramento, California 95825-1846

ACTUALLY SENT FEB. 22 JB

~~November 23~~, 1994

Memorandum

To: Chief, Division of Planning and Technical Services, U.S. Bureau of Reclamation, Mid-Pacific Region, Sacramento, California

From: Acting Field Supervisor, Ecological Services, Sacramento Field Office, Sacramento, California (ES)

Subject: USBR - Planning Aid Memorandum on the Bureau of Reclamation's Proposed New Water Contract with El Dorado County Water Agency, Sacramento County, California

Introduction:

This Planning Aid Memorandum (Memorandum) is provided to assist your planning process as outlined under Section 2 of the Fish and Wildlife Coordination Act (in 16 U.S.C. 661 et seq.). The Memorandum focuses on 1) potential effects of the Bureau of Reclamation's (Reclamation) new water contracts with the El Dorado County Water Agency (Agency), 2) impacts of project operation modifications due to the new water supply contract, and 3) unmitigated project impacts ("on-going" impacts). The new water contract is specifically authorized to meet the Agency's immediate need within its 1990 boundaries. The recommendations herein are designed to address American River, Folsom Reservoir, and Central Valley Project (CVP) impacts.

The Fish and Wildlife Service (Service) has evaluated Reclamation's proposed new water service contract with the Agency, associated authorizing legislation for the project, and available American River background documents. The Central Valley Project Improvement Act (CVPIA) specifically exempts the proposed new contract from the CVPIA contract limitation provisions. Reclamation is legislatively directed by Section 206 of the Energy and Water Development Appropriations Act of 1990 (Act of 1990) to meet the immediate municipal and industrial water need within Agency's 1990 boundaries. While the CVPIA [Section 3404(b)] excepts the new proposed contract from the CVPIA's limitation on new water contracts, any new water Reclamation contract is still subject to the requirements of the Act of 1990 and the provisions of the CVPIA except as noted above.

Description of the Action:

The proposed action is directly associated with three other closely related actions. The new proposed actions directed by the Act of 1990 and the CVPIA are:

A) Reclamation's proposed new interim contract with the Agency is authorized to meet its immediate service area municipal and industrial need. The Agency's new interim contract would not exceed 15,000 AF. The water will be diverted from Folsom Lake or for exchange upstream on the American River or from tributaries, considering reasonable efforts to implement water conservation programs within areas to be served by the contracts.

B) Under a separate action and environmental impact statement, also authorized by the Act of 1990 and exempted from the CVPIA's contract limitation provisions, Reclamation is authorized to enter into a new interim water service contract with Sacramento County Water Agency (Sacramento). The water quantity will not exceed 22,000 acre-feet (AF) annually and its diversion point "shall, to the maximum extent reasonable and feasible, take place at or near the mouth of the American River."

C) Sacramento will subcontract 7,000 AF of the total interim contract amount with the City of Folsom. The City of Folsom will also comply with the CVPIA provisions and water conservation requirements prior to entering into a subcontract.

D) Reclamation's interim contract with San Juan Suburban Water District (SJSWD) is authorized to meet its immediate service area municipal and industrial need. SJSWD's contract amount will not exceed 13,000 AF annually. The water would be diverted at Folsom Reservoir.

These interim contracts are identified as a first-phase of a contracting program to meet the long-term needs of El Dorado and Sacramento Counties. The actual annual quantities delivered under the contracts would be determined based upon the quantity of water to meet the immediate need within the Agency's, Sacramento's, City of Folsom's, and SJSWD's service areas. The final Agency contract quantity will be determined following "reasonable efforts to implement water conservation programs within areas to be served by the contracts." (P.L.-101-514)

Possible Impacts to Fish and Wildlife:

The proposed interim contract will change the operational flexibility of Folsom Reservoir and will place additional burden on other CVP facilities to meet project requirements. A portion of Reclamation's water rights will be reallocated and delivered to a new place of use. Less water will be available for Folsom's carry-over storage and other project purposes. The proposed contract will incrementally increase on-going fish and wildlife impacts downstream of Folsom Reservoir and could lead to additional terrestrial

wildlife habitat conversions. On-going impacts may be exacerbated by the new interim water contract because operational flexibility will diminish. These on-going impacts are unmet CVP mitigation requiring correction. Avoidance and mitigation recommendations for on-going impacts are found in the Service's March 1992 Draft Fish and Wildlife Coordination Act Report (1992 FWCA report) on the Corps of Engineer's (COE) Folsom Dam and Reservoir Temporary Reoperation Study. Fish, wildlife, and recreation impacts will continue to occur if all the Act of 1990 and the CVPIA provisions and the recommendations in the 1992 FWCA report are not implemented concurrently.

The new interim water contract supply could induce growth in service areas. This could result in wildlife habitat conversions with adverse environmental impacts. However, if the new water contracts function to meet the immediate service area needs and water quantities are reduced as conservation measures are implemented, the contract deliveries alone would not result in terrestrial wildlife habitat conversions.

Because Folsom's operational flexibility will be reduced additional water from other CVP reservoirs will be required to meet water quality and endangered and threatened species requirements. The contract actions could lead to carryover storage effects on other CVP reservoirs and may have an impact on winter-run salmon (Oncorhynchus tshawytscha), Delta smelt (Hypomesus transpacificus), longfin smelt (Spirinchus thaleichthys), Sacramento splittail (Pogonichthys macrolepidotus), and capabilities to meet water quality standards.

Discussion:

Under this long-term contract phase, the proposed interim contract would meet El Dorado County's immediate service area need, but fish and wildlife needs would remain unmet. Long-term contract quantities to meet all future service area needs will not be established until a supplemental needs analysis and compliance with all CVPIA contract provisions are completed. Implementing proposals under the CVPIA provisions which include habitat improvement and protection measures may alleviate some on-going project impacts, but others would persist.

Among other things, the CVPIA establishes fish and wildlife protection, restoration, and enhancement as project purposes equal to providing municipal, industrial, and agricultural water supplies. This interim contract phase of the long-term contracting program should incorporate mitigation for on-going project and new water contract impacts. Some fish and wildlife protection, restoration, and enhancement measures may be duplicated by related CVPIA actions, but unmet mitigation needs and commitments will remain as the CVP's responsibility.

Our recommendations for the protection of the project area's fish and wildlife resources are in conformance with the Service's Mitigation Policy (published in the Federal Register 46:15; January 23, 1981). This policy provides Service personnel with guidance in making recommendations to protect or conserve fish and wildlife resources. By helping ensure consistent and

effective Service recommendations, the policy allows agencies and developers to plan early for mitigation needs.

The Council on Environmental Quality and the Service Mitigation Policy define mitigation as including the following elements: avoiding impacts, minimizing impacts, rectifying impacts, reducing impacts over time, and compensating for impacts. The Service considers these elements to represent the most desirable sequence of steps in the mitigation planning process. In determining when to move from any one element to the next in the sequence, success or failure of particular techniques or approaches in the past under similar circumstances (as reflected in the results of previous mitigation evaluation studies) are taken into account.

Recommendations:

The Service recognizes that the CVPIA authorizes a long-term contract, but the Agency's long-term need must be reevaluated from the perspective of the CVPIA. Implementing CVPIA contract provisions and establishing a realistic projected service area need appears to be a long-term contract prerequisite. In accordance with our mitigation policy and to meet the intent and purposes of the Act of 1990 and the CVPIA, the Service recommends that the Agency and Reclamation:

1. Screen all existing and new diversion points with California Department of Fish and Game and Service approved fish screens.

2. Substantiate immediate water need and identify reasonable water conservation opportunities for all service areas. Identify and implement water conservation measures and programs. The contract quantity must be analyzed annually to determine compliance with water conservation requirements.

3. Conduct a County-wide water needs analysis.

4. Enter into "interim" water service contracts for an adjustable water quantity, not to exceed 15,000 AF for the Agency. Incorporate all CVPIA contract provision requirements into the new contracts.

5. Concurrently with a new "interim" water service contract, implement the recommendations from the 1992 FWCA report for the Folsom Dam and Reservoir Temporary Reoperation Study (COE, 1992).

Summary:

The Service views the Agency's and SJSWD's proposed new water contracts with the broad perspective of the CVPIA and the Act of 1990. The CVPIA recognizes the inadequate CVP mitigation and compensation efforts, but attempts to protect, restore, and enhance fish, wildlife, and associated habitats along with providing water for agriculture, municipal and industrial purposes. The Folsom Project is not excepted from inadequate CVP mitigation. Adequate compensation for adverse impacts of constructing and operating Folsom Dam and

Reservoir was not achieved. The proposed new water service contracts cannot be separated from providing fish and wildlife needs in the American River Basin.

Fish, wildlife, and recreation impacts will occur due to less Folsom Reservoir inflows, outflows and carry-over storage. Models of the system and effects on outflow water temperature, Delta salinity changes, effects on endangered and threatened species, and effects on recreational opportunities must be included in the EIS. The EIS' cumulative impact section should combine all proposed new interim contract quantities and any other foreseeable American River water rights changes into a single analysis.

The system may be operated close to the without project alternative and continue on-going impacts downstream of Folsom Dam. The proposed new interim water contracts would result in less water available for other project purposes. Among other things, the intent of the CVPIA is to protect, restore, and enhance fish, wildlife, and associated habitats in the Central Valley and not merely to maintain the status quo or merely to increase water contracting. The new water contract actions should also contain environmental protection, restoration and/or enhancement components.

Thank you for the opportunity to assist in your planning process. Questions regarding this Memorandum may be directed to John Brooks or Mike Hoover at 916-978-4613.

Dale A. Pierce

cc: ARD, ES, Portland, Oregon
Bureau of Reclamation, North Central California Office (Attn: Rod Hall), Folsom, CA
El Dorado County Water Agency (Attn: General Manager)
National Marine Fisheries Service, Santa Rosa
Department of Fish and Game, Sacramento
CVPIA Team, Sacramento

american whitewater affiliation

Ms. Susan Scheufele
2121 Ocean St. Ext.
Santa Cruz, CA 95060

October 4, 1994

Grant Werschkill
EIP Associates
1401 21st Street
Sacramento, CA 95814

Dear Mr. Werschkill:

I am writing in response to the Draft Interview Questions on the Central Valley Project Water Service Contract.

Introductory Question:
1. What questions do you have on what we've just described?
My questions are as follows:
1. How much water, in terms of cubic feet per second (cfs) would be removed from the EID and PDPUD proposed diversion locations?
2. How much water would be removed from the South Fork American River by the proposed Texas Hill Storage Alternative and Small Alder Project alternatives?
3. How much water would be removed from the Rubicon River by the proposed diversion on the South Fork of the Rubicon River?
4. Where would the water for the proposed Texas Hill Storage Alternative and Small Alder Project reservoirs come from, only from the Weber Creek and Alder Creek respectively, or from other sources as well?
5. Is the GDPUD proposed diversion point at "Folsom Reservoir north" located on the North Fork American at the old Auburn Dam site, or is it located at the end of the North Fork of the river before the old Auburn Dam site?

Project impacts questions:
2. What potential impacts from the project are you most concerned about?
I am primarily concerned about the impacts of the project on whitewater recreation on the South and Middle Forks of the American River, and also concerned with the impacts of the project on the river ecosystems.

3. What potential impacts from the project are likely to present the most serious problems in terms of moving a project forward?
Any potential impacts on the amounts of water in the South and Middle Forks of the American River are likely to cause the most serious problems in terms of public outcry from the whitewater river recreation user and river conservation community, including protests to the State Water Resources Control Board. This would include both the EID and GDPUD proposed diversion locations above Folsom Reservoir, the proposed Texas Hill Storage and Small Alder Project alternatives, and the proposed diversion via the Robbs Peak diversion on the South Fork of the Rubicon River.

american whitewater affiliation

The South Fork of the American River is the second most popular whitewater run in the Western United States. The North and Middle Forks of the American river are considered suitable for Natural Recreation Area designation, and are also eligible for inclusion in the National Wild and Scenic Rivers system. Recent drought years have restricted boating flows well below each of these river's respective capacities, so any project causing further reductions in flows on these rivers would be considered objectionable. The river flows on the South and Middle Fork American Rivers support whitewater recreation and public navigation, and must be considered a beneficial use and public trust value protected under state law.

4. What do you believe will be the most effective approach for evaluating and accurately estimating these impacts?

I would like to see the EIR/EIS study the existing whitewater recreation revenue flow into the local area, and it's future growth potential under several scenarios. First, the direct and cumulative impacts of unlimited local growth versus the impacts of restricted local growth on the American River. Second, the direct and cumulative impacts of benign neglect of the local river recreation potential versus the impacts of major enhancement of river recreation facilities on the surrounding communities. In other words, evaluate the relationship between the local river resource and the surrounding communities.

The EIR/EIS should explore the quality-of-life impacts for county residents between becoming a high-density suburbanized bedroom community for Sacramento with a benignly neglected but heavily used American River, versus the potential for a lower density community, which retains a rural flavor, and has a highly successful tourist industry built around the well managed South Fork and the Wild and Scenic Middle and North Forks of the American River.

Project mitigation questions:

5. What types of mitigation measures for the adverse impacts of this project should the EIR/EIS analyze?

The EIR/EIS should analyze both facilities and river flows specifically for whitewater recreation. There are many well-known problems with camping, parking, and river access on the South and Middle Forks of the American River, and both rivers could easily accomodate many additional boaters if there were longer releases on the summer weekends as well as reasonable recreational releases during the fall, winter and spring "off-season".

6. Are there other potential desired outcomes that we should consider as potential mitigation related to this project?

South Fork:

It's difficult to find a place to camp on Saturday nights during the summer, as most of the campgrounds are booked up well in advance. Public campgrounds could be developed on the BLM land along the river, as well as at Henningson Park. A reasonably priced shuttle service and/or shuttle buses could help lessen the traffic congestion problems on the local roads. The takeout on both of the Class III runs could be made more efficient and help prevent further riverbank erosion problems with boatramps, at both the Henningson Park takeout and the Salmon Falls Bridge takeout. Improved sanitation facilities could be provided at the put-ins and take-outs. Longer flows on the river would spread the boaters and reduce the perceived impact. Allowing private boaters to exit the Chili Bar run at Marshal Gold State Park would help reduce the congestion on the upper half of the Class II Coloma to Lotus run, a formerly quiet training run for beginning boaters.

Executive Office: P.O. Box 85, Phoenicia, NY 12464
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AWA
american whitewater
american
whitewater
affiliation

Middle Fork:
There is a lot of public land on the Middle Fork of the American River which has not been developed into camp site areas due to the possible future presence of a new Auburn dam. El Dorado County could make a commitment to protecting the Middle Fork of the American River from future hydro projects and start to develop the recreational potential of the area. More specifically, there is only one place between the put-in and the take-out on the Middle Fork for public vehicle access, and it's at mile 5, inhabited by four or five full summer miner camps, and it's a terrible shuttle to get there from the put-in. The access to Ford's Bar at about the midpoint in the run is an extremely expensive private access. Other access points (a road to the edge of the bluff, and a trail leading to the river from the road, so as to minimize visual impact) along the river could be provided. An access point at Three Queens mine would provide a viable alternative, although a slight step above, to the South Fork American for a one day rafting trip. The Ruck-A-Chucky portage path could be improved and a portage trail around Murderers Bar could be provided. Longer flows which started earlier in the day would allow for more usage of the Class II run.
North Fork:
There is a lot of public land on the North Fork of the American River which has not been developed into camp site areas due to the possible future presence of a new Auburn dam. El Dorado County could make a commitment to protecting the North Fork of the American River from future hydro projects and start to develop the recreational potential of the lower part of the river within the county boundaries. The county could support the Bureau of Reclamation's project to remove the remains of the old Auburn Dam structure and creation a new Class II run in that area. The county could extend the old Auburn dam service road to the takeout for the shuttle for the run, so as to minimize traffic impacts on Hwy 49.

7. What other alternatives should the EIR/EIS analyze for providing a secure water supply?
There are several other water supply sources would should be considered as reasonable alternatives. First, reducing the losses in the El Dorado County water conveyance system, which currently represent 27 percent of the total projected future demand for water. Second, implementing water conservation measures as per the Urban MOU and the Agricultural MOU (when it is available), as well as implementing water recycling. Third, new building growth control limits within the county should also be analyzed as potential alternatives. Fourth, the feasability of purchasing additional water from the Folsom Reservoir water through the Placer County water agancy and/or the state water bank should be analyzed.

Questions about additional suggestions and concerns:
8. Do you have other suggestions which you believe would improve the project and enhance the chances for a project which would be acceptable to your interests?
AWA would not oppose the project if it were to take all of the water from Folsom Reservoir, the El Dorado County water conveyance system was repaired to reduce conveyance losses, and the two water districts sign the Urban MOU and the Agricultural MOU (when it is available).

9. Are there other important obstacles to this project which we have not discussed?
There should be a long-term project to restore the native fisheries on these rivers.

10. Are there other concerns regarding this project which we have not discussed?
Instream flows on the Weber Creek, Alder Creek, and the South Fork of the Rubicon River.

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(914) 688-5569

american whitewater affiliation

Project definition questions:

11. What part of this project would you change and/or eliminate?

I would eliminate all parts of the project which divert water from on or above the runs on the South and Middle Forks of the American River.

12. Are there diversion points or ways of diverting water that you believe are more acceptable than others? Why?

Diverting water from Folsom Reservoir is the only acceptable diversion point, because of the amount of public recreation on the South Fork, and the special wilderness qualities of the Middle Fork of the American River should be protected. The whitewater flows on these rivers must be considered a beneficial use and public trust value protected under state law.

13. Are there other interest groups and constituencies that we should contact?

I would contact Cal Trout, the Save the American River Association, and conservation groups concerned with the flows into the San Franciso Bay/Delta.

I perceive that El Dorado County and the surrounding counties are at a crux in terms of losing the special character of the Sierra foothills that attracted so many people to the area to begin with, and without growth controls the area will eventually become indistinguishable from the overdeveloped suburban areas of Southern California. In addition, it is inappropriate to continue to slowly erode the quality of the surrounding natural resources in order to build more houses. There is an important relationship between the river resource and the surrounding communities which should be preserved and enhanced.

I would like to reserve the right to make additional comments on this project as more information becomes available. Please contact me if I can be of any further assistance.

Sincerely,

Susan Scheufele

Susan Scheufele
Regional Coordinator, American Whitewater Affiliation
Conservation Chair, Loma Prieta Paddlers, Sierra Club RTS

November 23, 1994

TO: Jonas Minton

FROM: E.J. Koford

SUBJECT: EDCWA PROJECT; INTERVIEWS WITH USFWS, CDFG, NMFS.

The following notes summarize our meeting at 1334-1630 hours of November 22, 1994. The purpose of the meeting was to introduce the proposed project, discuss concerns of the agencies and ask a series of standardized questions intended to help identify issues, potential project alternatives, potential mitigations and other concerned parties that should be engaged in the EIR/EIS process. We were fortunate to manage a meeting of five agencies and a consultant together.

Attenders at the meeting were:

Jonas Minton	EDWCA
David Witter	EID
Cindy Chadwick	CDFG
Stafford Lehr	CDFG
John Brooks	USFWS
Pete Lickvar	USFWS
Chris Mobley	NMFS
Rick Hanson	EIP Associates
Roy Leidy	EIP
E.J. Koford	EIP

Mr. Minton (EDCWA) briefly summarized the project,consisting of the acquisition of 15,000 acre-feet of CVP water ("Fazio water"). He added that an NOP was originally issued in May of 1993, and comments received. The project has been modified, however in response to those comments, and a new NOP will be issued in the near future. In the current process EDCWA wants to "engage interested parties to the fullest extent from the beginning" and to "learn from [agencies] what has worked and not worked in the past." During this process, EDCWA will ask for advice, but eventually seek formal concurrence from agencies on the methodologies used to assess impacts. The intent is to avoid performing analyses which are ultimately dismissed in the EIR/EIS approval phase. Likewise, EDCWA will ask for suggestions for potential mitigation opportunities, but will seek agreement on the acceptability of mitigation before implementation.

Mr. Minton also described as part of PL 101 that Sacramento County is pursuing their acquisition of 35,000 acre feet of water from Folsom, and would be substantially analyzing downstream impacts to the lower American, Sacramento and Bay-Delta areas. EDCWA intends to rely heavily on their analysis for these portions of the EDCWA EIR/EIS. To the extent that these analyses may not be sufficient to include EDCWA's project, agencies should make them aware.

Ms. Chadwick (CDFG) interjects that CDFG is looking for a significant revised flow regime of the American River, and that it will be challenging to evaluate the cumulative affects of EDCWA's project without knowing what the revised flow regime is. She also mentions that San Joaquin County has filed for water rights from the S Folsom Canal (?), and this may affect the lower American River flows.

At this point, Mr. Lickvar (USFWS) requested that everyone have an opportunity to introduce themselves and identify their roles in this project. Mr. Lickvar in primarily involved in PG&E's 184 project, comprising Silver, Caples, Kyburz canal and Folsom. He was party to the protest on El Dorado's water application. His primary involvement is hydro effects downstream of Folsom, including Bay-Delta and ESA issues.

Mr. Brooks (USFWS) is in charge of new water contracts, particularly Federal water. He is also involved in the SAFCA reoperation proposal and is concerned about "carryover" storage effects on Bay-Delta water quality.

E.J. Koford, Roy Leidy and Rick Hanson of EIP are consultants to EDCWA in preparing the EIR/EIS.

Mr. Minton is manager of EDCWA and "on loan" from DWR to facilitate the project. He is lead manager for the project.

Ms. Chadwick (CDFG) is new environmental supervisor for Region 2 CDFG. She was department's liaison on the EDF lawsuit, and is pre-disposed to Bay-Delta issues. Julie Horenstein of her staff will be responsible for sensitive plants on the project.

Mr. Mobley (NMFS) is responsible for protected species, habitat conservation planning and Bay-Delta impacts. NMFS, as he states is primarily interested in the "broad picture." Also, their responsibility is primarily with anadromous fishes, none or which occur upstream of Folsom Reservoir.

Mr. David Witter (EID) represents one of the two agencies (GDPUD being the other) that delivers EDCWA water to its users. EID has project both independent and interrelated projects to the current one. As a CVP contractor, EID is required to comply with conservation rules implemented as a result of this project.

Mr. Stafford Lehr (CDFG) is district biologist for El Dorado, Amador and Calaveras Counties. He is primarily knowledgeable and responsible for fisheries and fish flows. He was an author on the department comment letter of June 1993[1] and reiterates many of those concerns. He is particularly concerned about the interaction of this project with others. He notes that projects 184, 2101, 2007 (?) Upper American, and 2155 (Chili Bar) are all up for renewal in the next 15 years. Is there enough water still in the river below all these projects to maintain fish? He also notes that SMUD will be looking carefully at the South Fork of the Rubicon, as they have related projects. There are constant issues with Small Alder and Texas hill which will be reiterated in this project, and he will want to see studies for this project using new methodologies and better techniques than the previous effort.

Mr. Minton (EDCWA) once again initiated a project description. There will be 15,000 acre feet, split between EID and GDPUD. Physical conditions require that one diversion (at least) be present for each district. There were many site specific questions regarding the Folsom North Diversion (Old Auburn Dam) Site. SL wanted to know what existing flows were, and what diversions would be. What are flows when PCWA is releasing minimum fish flows. PL offered that flows are as low as 50 cfs with lots of fluctuation. RL says mean monthly flows are orders of magnitude greater. Clearly it is not a steady state system. CC asks what flows are when water demand is high and power demand is low (e.g. low releases for power and irrigation). RL mentions that this site is known as a bass fishery, and using trout IFIM evaluations in this area is inappropriate. The group resolves, that site-specific flow data from this area should be collected and evaluated to determine if IFIM techniques are appropriate. These data for all reaches are useful, and will be the subject of a separate technical meeting to discuss if and where IFIM should be used.

JM described Rubicon River alternative, a "non-Fazio" alternative. This would be water originating in Loon Lake via Onion Creek and Pilot Creek as it as previously delivered to GDPUD before Stumpy meadows was constructed. This water would be "in lieu" of Fazio water, not in addition to Fazio water. CC said this doesn't look like a "good" alternative (e.g. if it is not really viable, lets drop it). JM says this alternative requires EDCWA to pay SMUD for power foregone, and would be an expensive alternative. SL mentions that negative impacts to the wild trout reach from Hell Hole to the confluence with the Middle Fork would be of concern. PL asks what are the costs of pumping? Presumably costs would be minimized by pumping during off-peak (night), which means there needs to be a storage facility somewhere.

DW described EID alternatives. The first being diversion Folsom reservoir, from an existing facility with existing diversion structures. White Rock Penstock is an unbuilt project. JM clarified that this EIR/EIS is intended to be the EIR for both the Fazio water and White Rock diversion. EID and EDCWA have applied for 17,000 acre feet from the upper lakes. CDFG had alleged the EIR was inadequate because it failed to look at the area between alternatives

[1]Mr. Lehr says that the letter from CDFG of 6/9/92 is actually a typographical error. The correct date is 6/9/93.

White Rock and Folsom. Litigation is pending. As a result, the current EIR will consider cumulative impacts of all or part of both withdrawals., e.g., 17,000 af+ 15,000 af or from 0 to 24,500 acre-feet (I don't know why its 24.5 instead of 32). CM comments that the EIR needs to address both the project alone and cumulative impacts. There needs to be an analysis of fishery needs between White Rock and Folsom.

Alternatives 3 and 4, the Texas Hill and Alder Creek Dams and Reservoirs are also in lieu of Fazio water. CM asks if these really are feasible options? Unrealistic options can be removed without full analysis by showing that they don't meet certain basic screening criteria. This would simplify the analysis.

There followed a lengthy discussion of the Lower American, lead primarily by CC. [CC rattled off an avalanche of issues, much faster than I could write them. I presume these are all issues familiar to JM). At the time SWRCB reconsidered EDF, they never came back to revise D1483. Instead, the water forum is working on implementing a major revision of the Lower American River flows to respond to the CVPIA. If, as seems likely, the CDFG takes a position that upstream diversions are contrary to objectives of the wild and scenic rivers act protection, it would be impossible for the department to support the EDCWA diversions. They may be in a position to look at environmentally preferred options, with the objective of optimizing American River flows. They will be looking at a wide range of alternatives. The Interim South Delta EIR is going forward, using presumed delta standards, which will be public after December 15th. The EDCWA analysis, then could consist of at least a 3X matrix, with a full range of Lower American River Alternatives, vs a full range of flow management alternatives. EDCWA also needs to look at the various flood control operation plans (SAFCA etc), under the Interim Reoperation of Folsom Dam and Reservoir and all other alternatives. It is possible the Auburn Dam alternative may be resurrected.

SL says EDCWA should generate some flow values for alternatives 5,6,and 7 and bringing those to a technical meeting we should be able to determine if IFIM is appropriate. The implication is that if diversions are on the order of 50 cfs, and flows are near 10,000 cfs, the difference will be unmeasurable by IFIM technique.

JB and PL say that such a technical meeting should include Bob Pine (Delta smelt) and Lisa Meng (Sacramento Splittail).

SL says his concerns are that the project should include a Habitat Management Plan as part of mitigation, and that growth inducing impacts are of serious concern. EDCWA should look to the CDFG comments to the draft general plan for guidance on growth inducing impacts. The project must consider effects of all other projects. SL wanted to know the status of Iowa Hill project? (withdrawn, acc. JM). What is the status of Silver Fork Project? (boundary will not be moved, acc. JM).

JM says EDCWA is in active negotiation about rare plant avoidance and mitigation.

At this stage we finally came to asking the 13 questions put forward by Grant, as the standard for all interviews. Responses are simply listed by questions number.

1. Questions about project?
   SL - diversions rates and timing
   PL - proposed survey areas and locations of ancillary facilities (such as storage)
   JB - what is the schedule for the need for the water?

2,3,4. Project Impacts?
   SL - concerned about site specific fisheries, and growth issues.
   JB,PL - ESA issues below Folsom. A planning aide letter exists, JB will provide to JM or EJK
   JB - Analyzing both non-Fazio water and Fazio water may make the issue too complicated. If there is a roadblock on one of the water sources, all will be stalled because they are in the same EIR.

   SL - Don't know if IFIM is needed for analysis for alternatives 6 & 7.

   EJK - Technical session dealing with IFIM will also discuss other potential outcomes

5,6,7. Project mitigation?
   PL - HCP under Section 7 and 10, using ESA guidance: no affect, potentially affect, or "take"
   SL - all diversions must be screened
   - possible to implement seasonal or diurnal avoidance of "take"
   PL - 400 acres are in place for endangered plants
   JB - would like to see mitigation banking for each species
   JB - there are "unmet needs" for species in county
   SL - CDFG would like to see an HCP, the more species incorporated, the better
   SL - other alternatives should consider Kyburz Canal/ Hazel Creek tunnel, if it comes through.

8,9,10. Other suggestions or concern?
   - The project is predicated on growth.
   SL - Will want to see construction impact considered.
   SL - Need erosion control plan
   PL - advises EDCWA remember to look at Category 1s and 2s. There are 32 special status species in the county. Alternatives 4 and 8 particularly have concerns for foothill and mountain yellow legged frog. The USBR has a list of applicable species.

11,12,13. Project definition and other interest groups?
   (all) - Project description is okay. Need to consider south delta water users. How will they feel about water quality.
   - Need to get data for South Fork from Chili Bar & Folsom & Middle Fork
   - Consider contacting Westlands Water District

Various members of the meeting had to leave. We agreed to set a tentative date of January 5, 1300 hours at CDFG for a followup technical meeting on flows and fisheries. The objective would be to determine what data are available and determine the level of data needed to evaluate alternatives (IFIM or less?).

MEMORANDUM

To: Mr. Rod Hall USBR

From: E.J. Koford EIP Associates

Date: January 26, 1995

Re: ACTION ITEMS RESULTING FROM MEETING 1/11/95

Thanks for talking with me today. I went back and reviewed my notes about the meeting we had with you, EDCWA, EID, GDPUD, Montgomery-Watson and Al Candlish. The notes are a little sketchy, because I remember coming away with the impression that most of the assignments fell to you. But I did write in my calendar to call you in about 2 weeks and check on your contact with Einer Maisch.

EDCWA met with USBR and others on 1/11/95 to discuss the need for data in the Auburn dam site reach of the river. EDCWA's motivation is a request from CDFG that flows in that portion of the river be characterized to show effects of changes on flow. EDCWA wanted to determine who would be responsible for collecting or developing those data.

This is what I have in my notes:

> There are at least three studies in progress in the Upper American with potential overlapping data requirements.
>
> 1) American River Water Resources Investigation (ARWRI) (Al Candlish)
> 2) Site specific investigation of installing diversion structure near Auburn dam site.
> 3) EIS/EIR by EDCWA regarding the PL101 "Fazio" water

Jeff Kitschel presented the ARWRI project as a programmatic document working over 5 counties, and integrated with a groundwater model, surface model, and water conservation measures among others. The project is in the alternative development phase. Each alternative consists of parts to meet water needs of specific service areas. The plan describes water availability and diversion in terms of monthly or annual acre-feet and does not attempt to describe instream flows. Their schedule is for Draft EIR/EIS in late '95/early '96, final in mid '96. Paul Converse of EDCWA asked how they were coordinating with the Corps Flood Control Project to which Mr. Candlish said they weren't, but that they would foresee a "bridging document" at some future time to cover

this.

Rod Hall of USBR described the Auburn Dam site pump facility project, listing his five objectives as

1) To remove the safety problem of the tunnel
2) Put in a 50,000 cfs pumping plan (or 50,000 acre-feet?)
3) To improve or support recreation in open portion of channel
4) To optimize recreational and fishery opportunities
5) To provide some riparian restoration.

The project area is from 3/4 mile upstream to the high water of Folsom, described as "knickerbocker." Rod indicated the project deliverable was planned for late '95/ early '96, but that this date could change as a result of funding variables from the government.

EJ Koford presented the El Dorado County Water Agency project, with the objective of determining where 17,000 acre feet of water provided under PL101 would be delivered. There are several alternatives under consideration, of which the Auburn damsite diversion is one. Meetings with CDFG concerning this project indicate that CDFG needs to know what flows are in the river at the point of diversion, and what the affects of the diversion will be. EDCWA was under the impression that these data would be available from USBR, since they USBR would need to provide these data to CDFG to accomplish the objectives of their project.

Rod Hall described that flows in that portion of the river were controlled primarily by PCWA, which operates "oxbow" upstream. Jack Hannaford notes that the North Fork is uncontrolled, and possibly ungaged. Several people thought the fishery releases in this reach were on the order of 50-75 cfs, but no one knew for certain. Further, PCWA may be subject to relicensing requirements in the next 30 years that would likely increase those release requirements.

It appeared from the schedules of the projects, and the need for information that Rod Hall and USBR would be the first agency needing to develop the flow information for this portion of the river. Rod felt that Einer Maisch should be able to provide good flow data, a release schedule and some information about fishery release requirements. It was my impression that Rod was going to contact Einer to determine what information was available and to get information about Oxbow, the fish release schedule and flow schedule for this stretch.

I asked Paul Converse or EDCWA, Dave Witter or EID and Marie Davis of GDPUD whether this meeting substantially answered all our questions, and they were satisfied. My recollection was that the onus was primarily on Rod to get data from Einer. We agreed to stay in touch and assist as possible.