United States Department of Agriculture | Forest Service | Plumas National Forest | 159 Lawrence Street
P.O. Box 11500
Quincy, CA 95971-6025
(530) 283-2050

File Code: 2770

Date: November 14, 2001

Mr. Henry M. Ramirez
Project Power Planning Branch
State Water Project Analysis Office
Department of Water Resources
1416 Ninth Street
Sacramento, CA 94236-0001

Dear Mr. Ramirez:

The following is the Forest Service response to your Oroville Facilities (FERC Project No. 2100) NEPA Scoping Document 1 and CEQA Notice of Preparation (SD1) issued on September 27, 2001. As per regulation, this response is being made within the 60-day public comment period.

While no project facilities have been constructed on National Forest System lands, Lake Oroville does inundate National Forest System lands located on the North, Middle, and South forks of Lake Oroville. Pursuant to Section 4(e) of the Federal Power Act, the Forest Service has the authority to stipulate license conditions to provide for the adequate protection and utilization of National Forest System lands and to ensure that the license will not interfere or be inconsistent with the purpose for which the National Forests were created. As Forest Supervisor, it is my responsibility to ensure that the operation and maintenance of the Oroville Facilities are consistent with the National Forest Management Act and the Direction, and Standards and Guidelines for achieving the long term Goals and Objectives described in the *Plumas National Forest Land and Resource Management Plan* as amended by the Regional Forester's decision implementing the *California Spotted Owl Sierran Province Interim Guidelines* and the *Sierra Nevada Forest Plan Amendment*. It is my expectation that the proposed studies will help identify and focus on appropriate 4(e) stipulations.

A listing of applicable Forest Plan Standards and Guidelines was submitted to you on January 29, 2001. Some of the Standards and Guidelines were subsequently modified or replaced by Standards and Guidelines incorporated into the *Sierra Nevada Forest Plan Amendment*. While these changes have not been sent to you, it is unlikely that the updated Standards and Guidelines would result in alterations to Issue Statements appearing in SD 1. A listing of items the Forest Service wishes to have addressed during relicensing was submitted on March 2, 2001. The Forest Service has participated in the formulation of Issue Statements and Study Plans.

Environmental and Developmental Issues
The Work Groups organized by the Department of Water Resources has done an excellent job of identifying issues. For National Forest interests, I consider the following issues most important to decision-making:

4.3 Water Quantity and Quality (W)
W3, W5, and W7

4.4 Fisheries Resources (F)
F1, F4, F7, F8, and F13

4.5 Terrestrial Resources (T)
T1 through T11

4.7 Cultural Resources (C)
CR1 through CR4

4.9 Land Use, Land Management and Aesthetic Resources (LU/LM/A)
LU1 and LU2

The current proposal addresses federally listed Threatened and Endangered species in issues F13 and T2. The Forest Service needs a similar evaluation of agency identified Sensitive Species for those portions of the project that are located on or affecting National Forest System lands.

The relationship of the project to the Middle Fork Feather Wild and Scenic River needs to be studied. The issue to investigate is whether operation and maintenance of the project encroaches on the area or unreasonably diminishes the scenic, recreational, and fish and wildlife values present in the area on the date of designation of the Middle Fork of the Feather River (October 2, 1968) as a component of the National Wild and Scenic River System (reference PL 92-542, 16 USC Ch 28 Sec 1278).

Reasonable Alternatives
Although it is too early in the relicensing process to identify alternatives, since the proposed action has not been identified, I request that the proposed action or one alternative include any mandatory conditions required by the Forest Service.

Scope and Depth of Analysis
It is difficult to identify the scope of analysis without clearly understanding the cause and effect relationship between the project operations and a particular resource. Project effects do not necessarily end at the project boundary. The scope of studies should include the area affected by the project, and not be limited by the project boundary. As results from the studies are available, it should be possible to refine the analysis for the draft Environmental Assessment.

Issues That Do Not Require Detailed Analysis
At this early stage in the relicensing process, it is difficult to identify issues that need less analysis.

Please contact Mike Taylor, Hydrologist, at (530) 534-6500 or mftaylor@fs.fed.us if you have any questions.

Sincerely,

Mark J. Madrid

MARK J. MADRID
Forest Supervisor