Chapter 2
List of Commentors and Master Responses

The SWRCB received 164 comment letters on the Draft EIR. This chapter provides a list of commentors (Table 2-1) and master responses to comments. The comment letters and individual comments within the letters are numbered to allow tracking of the responses that are presented in chapter 3, "Comment Letters and Responses." Changes integrated into the Final EIR are presented in Appendix A.

Table 2-1. List of Comment Letters on the Draft Environmental Impact Report for the Farad Diversion Dam Replacement Project

Letter #	Commentor
1	US Fish & Wildlife Service, Robert D. Williams, Field Supervisor, May 13, 2002
2	California Department of Fish & Game, Larry L. Eng, Ph.D., Assistant Regional Manager, April 17, 2002
3	California Department of Transportation, Ann Marie Robinson, Office of Regional and Transit Planning, May 16, 2002
4	California Regional Quality Control Board, Lahontan Region, Scott Ferguson, Chief, Northern Watersheds Unit, May 13, 2002
5	California Trout, Curtis Knight, Area Manager, May 13, 2002
6	Friends of the River, Steven L. Evans, Director, May 13, 2002
7	Remy, Thomas and Moose, Osha R. Meserve, May 13, 2002
8	Chinook Engineering, Jay S. Kidder, P.E., Principal, May 9, 2002
9	McLaughlin Water, Richard E. McLaughlin, P.E., May 10, 2002
10	Truckee Meadows Water Authority, Malyn Malquist, General Manager, May 13, 2002

Table 2-1. Continued

Letter #	Commentor
11	Thomas L. Smith, no date
12	Richard Anderson, Publisher and Editor, California Fly Fisher, May 6, 2002
13	Robert N. Ferroggiaro, Federation of Fly Fishers, Northern Calif. Council, May 9, 2002
14	Daniel A. McDaniel, Director, Federation of Fly Fishers, Northern California Council, Stockton, May 10, 2002
15	Charles Albright, President, Sierra Nevada Whitewater Club, no date
16	Jerry Mensch, California Sportfishing Protection Alliance, April 29, 2002
17	Ronald J. Hunter, Patagonia Environmental Programs, April 24, 2002
18	Anna Harlow, Ecology Center of Southern California, April 20, 2002
19	Richard Anderson, Publisher and Editor, Fly Fisher, Truckee, April 9, 2002
20	Christina King, Pikes Peak River Runners and the Private Boaters Coalition, April 9, 2002
21	Joan B. Lee, Legislative Liaison, Gray Panthers, April 4, 2002
22	Deanna Spooner, Public Lands Director, Pacific Rivers Council, March 29, 2002
23	Michael Burgwin, Executive Committee Member, Tahoe Area Sierra Club, May 5, 2002
24	Jon Wilson (Master Form Letter – 72 total received)
25	Marti S. (Master Form Letter – 8 total received)
26	Corey Phillips and Peter Moulds, April 22, 2002 (Master Form Letter – 2 total received)
27	John McHugh, May 8, 2002
28	Andy Rost, May 13, 2002
29	Thomas E. Gray, May 8, 2002
30	Jack Fleig, May 3, 2002
31	Mrs. R.M. Brown, no date
32	Wayne Vandergriff, May 7, 2002
33	Donald D. and Lenna J. Hossack, Windward Luv, May 8, 2002
34	Robin Truitt, May 8, 2002
35	Bob Baiocchi, no date
36	Julie Drucker, May 2, 2002
37	Darin Bue, May 2, 2002
38	Kevin Wolf, Kevin Wolf & Associates, April 1,2002
39	August B. Cenname, May 1, 2002
40	Patty Lomanto, May 2, 2002
41	Nicolas Ferlatte, no date
42	Kathleen Nora Marsh, March 29, 2002
43	Mrs. R. H. Stoecker, March 29, 2002
44	Dorothy Geisler, April 27, 2002
45	Ken Brown

Table 2-1. Continued

Letter #	Commentor
46	Darby Brookman, no date
47	Damara and Marc Goddard, April 23, 2002
48	Brad Monsma, April 22, 2002
49	Steve Johnston, April 22, 2002
50	Marc V. Lind-Hanson, April 22, 2002
51	Jeffrey E. Lorelli, April 20, 2002
52	Larry E. Dennis, April 19, 2002
53	June P. Traweek, April 18, 2002
54	Todd Paige, April 18, 2002
55	Helena Coughlin, April 12, 2002
56	Kris Schmidt, April 12, 2002
57	Truman L. Burns, April 12, 2002
58	Lloyd Stradley, April 11, 2002
59	Judith Dwyer, April 4, 2002
60	Robert A. Bell, April 2, 2002
61	Robert A. Bell, May 5, 2002
62	Paul Orloff, April 2, 2002
63	Janine Rickard, April 1, 2002
64	Joseph G. Petrofsky, April 28, 2002
65	MacKenzi Keliher, no date
66	James C. Duffy, May 13, 2002
67	David Fiore, April 25, 2002
68	Tina Peak, April 29, 2002
69	Bob Madgic, no date
70	Patrick Huber, no date
71	Richard Hart, no date
72	Tuffriverstuff.com
73	Sean Costley, no date
74	Marcus Taylor, P.E., no date
75	M. Noel Fitzgerald, no date
76	Alli Nagel, April 9, 2002
77	Matt Stoecker, no date
78	Elizabeth M. Haines, no date
79	John and Helen Yose, no date
80	Kay S., no date
81	Randy Porpilia, April 2, 2002
82	Bruce Ajari, May 13, 2002
83	Teal A., no date

Table 2-1. Continued

Form Letters	Commentor
	Unknown Author (same as Comment Letter Number 24)
	Unknown Author (same as Comment Letter Number 24)
	Unknown Author (same as Comment Letter Number 24)
	Unknown Author (same as Comment Letter Number 24)
	Unknown Author (same as Comment Letter Number 24)
	Megan Adam (same as Comment Letter Number 24)
	Holly Alier (same as Comment Letter Number 24)
	Faye Armitage (same as Comment Letter Number 24)
	Trip Armstrong (same as Comment Letter Number 24)
	Ben A. (same as Comment Letter Number 24)
	Jason Barringer (same as Comment Letter Number 24)
	Peter Beager (same as Comment Letter Number 24)
	William Beddin? (same as Comment Letter Number 24)
	Jody Bender (same as Comment Letter Number 24)
	Michael Bittner (same as Comment Letter Number 25)
	Pam Bittner (same as Comment Letter Number 25)
	Mark Blume (same as Comment Letter Number 24)
	Kim Boganes (same as Comment Letter Number 24)
	Jeff Boyd (same as Comment Letter Number 24)
	JeniferBradly (same as Comment Letter Number 24)
	Kurt C. (same as Comment Letter Number 24)
	Anne C. (same as Comment Letter Number 24)
	Tod & Lynn Cieszks (same as Comment Letter Number 24)
	M. Colpo (same as Comment Letter Number 24)
	Michael Colpo (same as Comment Letter Number 24)
	Paul Cooney (same as Comment Letter Number 24)
	Kathy Cotter (same as Comment Letter Number 24)
	Patrick D. (same as Comment Letter Number 24)
	Scott Daily (same as Comment Letter Number 24)
	Jarrod Deines (same as Comment Letter Number 24)
	Cory Engles (same as Comment Letter Number 24)
	Pete Epanchia (same as Comment Letter Number 24)
	Jennifer Falk (same as Comment Letter Number 24)
	Gretchen Ferrell (same as Comment Letter Number 25)
	Gregor Finke (same as Comment Letter Number 24)
	Rob Flesher (same as Comment Letter Number 24)
	Kerry Ford (same as Comment Letter Number 24)
	Jim Ford (same as Comment Letter Number 24)
	D. Gallagher (same as Comment Letter Number 24)
	Jeremy Garncarz (same as Comment Letter Number 24)
	Heather Gilbert (same as Comment Letter Number 24)

Table 2-1. Continued

Form Letters	Commentor
	Linda Gilbert (same as Comment Letter Number 24)
	Matt Goodnight (same as Comment Letter Number 24)
	Elyah Gordon (same as Comment Letter Number 24)
	Jennifer Guinan (same as Comment Letter Number 24)
	Mark Hammond (same as Comment Letter Number 24)
	Andrew H. (same as Comment Letter Number 24)
	Michael J. (same as Comment Letter Number 24)
	Ben K. (same as Comment Letter Number 24)
	Carol Lyons (same as Comment Letter Number 24)
	David M. (same as Comment Letter Number 24)
	Susan McNamara (same as Comment Letter Number 25)
	Stephen Miller (same as Comment Letter Number 24)
	Peter Moulds (same as Comment Letter Number 26)
	Kathy N. (same as Comment Letter Number 24)
	Liam N. (same as Comment Letter Number 24)
	Jerry P. (same as Comment Letter Number 24)
	Ingrid Pankonin (same as Comment Letter Number 25)
	Corley Phillips (same as Comment Letter Number 26)
	B. Powell (same as Comment Letter Number 24)
	S. Powell (same as Comment Letter Number 24)
	B. Puchably (same as Comment Letter Number 24)
	Bruce R. (same as Comment Letter Number 24)
	Jill R. (same as Comment Letter Number 25)
	David R. (same as Comment Letter Number 24)
	Rob Retting (same as Comment Letter Number 24)
	S. S. (same as Comment Letter Number 24)
	Marti. S. (same as Comment Letter Number 25)
	Sarah Sheppard (same as Comment Letter Number 24)
	Will Sicke (same as Comment Letter Number 24)
	Trina Spaulding (same as Comment Letter Number 24)
	Ricahard Spauling (same as Comment Letter Number 24)
	Elizabeth Steuck (same as Comment Letter Number 24)
	Patrick Walter (same as Comment Letter Number 24)
	Mike Washburn (same as Comment Letter Number 24)
	Jane W. (same as Comment Letter Number 24)
	Natasha White (same as Comment Letter Number 24)
	P. Richard Wilknson (same as Comment Letter Number 24)
	Jon Wilson (same as Comment Letter Number 24)
	Peter York (same as Comment Letter Number 24)
	Carl Z. (same as Comment Letter Number 25)

Introduction to Master Responses

The SWRCB developed Master Responses to Comments to allow for a fully integrated explanation of recurring issues raised by commenting agencies, organizations, and individuals. The use of a Master Response is in no way intended to minimize the importance of the individual comments, and specific responses to individual comments are also provided in the Final EIR in chapter 3, "Comment Letters and Responses." Master Responses are used to highlight some of the issues that appeared to be of particular concern to the commentors, including issues unrelated to significant environmental impacts. Master Responses were prepared for comments on the following topics:

- Project Purpose and Need,
- Water Quality,
- Aquatic Resources,
- Recreation,
- Selection of Alternatives,
- Cost vs. Public Benefit, and
- Cumulative Impacts.

The Master Responses include information on whether changes have been made to the text of the Final EIR. Chapters and portions of chapters with substantial changes are presented in appendix A.

Truckee Meadows Water Authority (TMWA) commented that SPPC may transfer its hydroelectric generating assets, including the Farad project, to them if certain conditions occur. References to SPPC in this EIR will apply to any future owner/operator (successor in interest) of the Farad project.

Purpose and Need Master Responses

Need 1: Demand for Electricity

Many commentors stated that the proposed project provides only a very small amount of power relative to the environmental effects of the project and indicated that they thought this additional electricity is not needed. The purpose of this EIR is to analyze and disclose the environmental impacts associated with any SWRCB approval of water quality certification for the proposed diversion dam; the State of California's power requirements are not the subject of the EIR. The SWRCB, however, will review and consider the information in the Final EIR, including the comments it has received regarding the need for the project, before deciding whether or how to approve the project.

Moreover, according to the California Energy Commission, California does not have the capability to produce enough electricity to be self-sufficient with regard to energy needs; electric energy consumption in 2002 is expected to exceed the supply produced in California by at least 5,000 megawatts. Even if all planned new electricity-producing facilities are built and residents continue to practice conservation, the demand for power is still expected to exceed California's supply by approximately 3,000 megawatts (http://www.energy.ca.gov/electricity/2002_supply_demand_graph.html – accessed August 12, 2002). Any new source of electricity in California will increase the supply. The reconstruction of the Farad Diversion Dam will allow the production of an additional 2.6 megawatts of power, which is enough electricity to serve the daily needs of approximately 1,800 homes.

Need 2: Diversion at Another Location

Several commentors indicated that SPPC should divert water at another downstream location. To generate power at the Farad Power Plant, the diversion must be in the proposed location to generate the appropriate head pressure to spin the turbines.

Need 3: Existing River Values

Many commentors indicated that this segment of the Truckee River has benefited greatly or become more natural in appearance since the diversion washed out. The impact analysis of the Draft EIR was based on existing conditions and evaluates the project's effects on the river in its current state. The commentors did not identify any inadequacies in the Draft EIR or identify additional significant impacts, project alternatives, or mitigation measures. Accordingly, no changes are made in the Final EIR in response to this comment. Although this portion of the Truckee River appears natural, it is part of a highly managed watershed system with many reservoirs and a human-controlled hydrology. The ecosystem within the project construction and operation area will be protected through implementation of the proposed project with the mitigation measures outlined in the Final EIR.

Water Quality Master Responses

Water Quality 1: Water Temperatures during Low Flow Periods

Several commentors were concerned about the potential for the proposed project to increase water temperatures during low flow periods. Flows are only one factor in determining water temperature; other factors include windspeed,

dewpoint, solar radiation, channel geometry, and vegetation shading. Based on all these factors, the modeling for this project indicates there will be a negligible impact on water temperatures (approximately 0.1ºC) as described on page 4-18 of the Draft EIR. During a low flow period, with flows of less than 100 cfs, water temperatures will not be affected because no diversions will occur during this time. Diversions will not occur until river flows are 285 cfs when the applicant will divert approximately 135 cfs and maintain 150 cfs in the stream (as specified in Mitigation Measure 6-3).

Water Quality 2: Temperature Monitoring

Several commentors were concerned about the number of years needed to validate the temperature model. High flows upstream of the diversion and low flows within the bypassed reach will provide the most useful data for validating the temperature model because only high flows (500–600 cfs) occurred in 2001 when the data were collected. Temperature data collected over 2–3 years will provide sufficient information to validate the temperature model under a range of flow conditions. The SWRCB is changing the monitoring period to 3 years to capture a range in flows.

Aquatic Resources (Fish) Master Responses

Fish 1: Flow Needs for Lahontan Cutthroat Trout and Other Species

Several commentors indicated that additional analysis should be conducted for Lahontan cutthroat trout (LCT) and other species. Flow conditions necessary to maintain and protect native fish populations, including LCT, in the project reach have not been investigated nor does information exist regarding historic seasonal occurrence or use of the project area by LCT and other species. DFG (1996) stated that the overall management goal for the Truckee River system is "to provide flow and channel habitat conditions necessary to protect stream-dependent public resources." DFG further stated their belief that "this goal would be achieved by providing habitat conditions necessary to support self-sustained rainbow and brown trout fisheries throughout the study area." Presumably, this explains why DFG selected these species as the species on which to base instream flow recommendations.

Because information on LCT is lacking or incomplete, the SWRCB assessed the potential effects of the proposed project on LCT based on knowledge of general trout ecology and the habitat needs of rainbow trout, which exhibit basic similarities in life history and habitat requirements. The environmental review process for TROA may provide additional information regarding appropriate instream flows. Accordingly, Mitigation Measure 6-3 has been revised to allow SPPC to request the SWRCB to review information that may be developed in the

TROA EIR/EIS process on the instream flow requirements for LCT and other fish. The SWRCB may consider revising the 150 cfs bypass flow required under Mitigation Measure 6-3 if supported by studies constituting substantial evidence.

Mitigation Measure 6-3 has also been clarified in response to several comments. It was not the intent for SPPC to meet the 150 cfs instream flow by drawing water from storage. The Mitigation Measure now states that SPPC will maintain a minimum flow of 150 cfs, or the total Truckee River Flow immediately upstream of the diversion dam, whichever is less, in the operation area. The revised mitigation measure is described below.

Mitigation Measure 6-3: Maintain a minimum flow of 150 cfs or the total Truckee River flow, which ever is less, in the operation area ~~at all times during project operation~~

SPPC shall maintain a minimum flow of 150 cfs in the bypass reach below the diversion dam, or the total Truckee River flow immediately upstream of the diversion dam, whichever is less, in the operation area.

In order to maintain habitat for juvenile, adult, and spawning rainbow trout and spawning brown trout life stages, during project operations the project applicant will maintain a minimum flow in the project operations area of 150 cfs, or the total Truckee River flow immediately upstream of the diversion dam when the total Truckee River flow immediately upstream of the diversion dam is less than 150 cfs. SPPC may request the SWRCB to review additional information (such as PHABSIM) about instream flow requirements for LCT and other fish that is developed during, and included in, the final TROA EIS/EIR. The SWRCB will reserve jurisdiction in any water quality certification to revise the 150 cfs bypass flow, in its discretion, if supported by information included in the final TROA EIR/EIS constituting substantial evidence.

Fish 2: Limitations of Instream Flow Incremental Methodology

Several commentors expressed concern that Instream Flow Incremental Methodology (IFIM), specifically the Physical Habitat Simulation System (PHABSIM) component is not the most accurate predictor of aquatic habitats and aquatic habitat suitability. SWRCB recognizes the limitations of PHABSIM as well as potential limitations of applying DFG's results to the project reach (see page 6-11 of the Draft EIR). However, PHABSIM remains a common tool for assisting in water resource planning and decision making. For the purposes of CEQA, the PHABSIM results are the only available source of quantitative information for evaluating flow-related effects on aquatic habitat. Consequently, the PHABSIM results were used along with professional judgment, conversations with DFG staff, and additional water temperature analyses to assess the

significance of flow-related impacts and develop mitigation measures for the proposed project.

Fish 3: Need for Minimum Flows of 200–250 cfs

Many commentors indicated a preference for higher minimum flows of 200 or 250 cfs. However, existing information indicates that a minimum flow of 150 cfs meets the physical habitat requirements for maintaining fish in good condition. DFG (1996) stated that minimum flows needed to maintain trout populations in Reach 1 (which includes the project reach) are those that maximize juvenile rainbow trout habitat and provide at least 50% of maximum available habitat for other life stages. According to DFG's PHABSIM results, a year-round minimum flow requirement of 150 cfs meets these criteria by providing 90%, 100%, 85%, and 90% of the maximum habitat value for fry, juvenile, adult, and spawning rainbow trout, respectively. Although minimum flows of 200–250 cfs provide 95–100% of the maximum habitat value for rainbow trout spawning and adult life stages, these flows provide only 73–84% of the maximum habitat value for fry and 89–95% of maximum habitat value for juveniles.

Fish 4: Flow Ramping Effects

Several commentors indicated concern about the potential adverse effects to aquatic resources from ramping rates in the bypass reach. Some commentors confused whitewater boating events with ramping rates. Ramping rates are specific to the rate of change in flow for whitewater boating, annual maintenance, and emergency shutdowns of the powerhouse. Ramping rates are distinct from the flows for weekend whitewater boating. DFG has provided a flow ramping rate for the Truckee River which is protective of aquatic resources. Commentors did not provide information that this ramping rate will not be protective of aquatic species. To determine the performance of the ramping rate, a monitoring program has been added to Mitigation Measure 6-5:

To evaluate the potential effect of ramping rates on the aquatic resources in the project area, SPPC will develop and prepare a study plan in consultation with the SWRCB and the DFG to quantify the number of fish stranded after ramping events in the affected reach. The objectives of the plan will be to evaluate DFG's recommended ramping rates, and, if warranted, revise these rates to avoid or minimize impacts on aquatic resources. Evaluations should be conducted during planned flow ramping events during the rainbow trout fry emergence and rearing period (June 1–September 30). If the level of stranding is determined to have a significant impact on fish populations, the ramping rates shall be revised in consultation with DFG and the SWRCB. The SWRCB will reserve jurisdiction in any water quality certification to revise the ramping rates accordingly.

Recreation Master Responses

Recreation 1: Recreation Flows

Many comments were received about Mitigation Measure 9-1, which requires SPPC to maintain 1 weekend per month of recreational flows (Note: there were two Mitigation Measures numbered 9-1, this Mitigation Measure has been renumber 9-2 and replaces Mitigation Measure 9-2 in the EIR which was removed). Some commentors endorsed this mitigation, while others were concerned about the impacts of the weekend flows on aquatic life (fish and macroinvertebrates). One commentor suggested off-site mitigation for loss of whitewater boating opportunities. In response to these comments the SWRCB increased the monitoring requirements for weekend boating flows in Mitigation Measure 9-2 and developed a new alternative mitigation measure. The SWRCB also refined the flow requirements and provided language that will clarify the basis for the flow range provided in Mitigation Measure 9-2.

On behalf of the project, the TMWA may contribute $1.5 million for the construction of a whitewater recreation park on the Truckee River in Reno, Nevada. A whitewater recreation park is one of the elements of the Truckee River Recreation Plan, which is intended to integrate existing recreation plan elements for the City of Sparks, the City of Reno, and Washoe County and to enhance recreational opportunities within the Truckee River corridor. This measure has now been included in the Final EIR as Mitigation Measure 9-3.

Construction of the whitewater recreation park will serve as mitigation for the adverse impacts of reduced flows on the whitewater boating beneficial use by providing year round boating opportunities downstream on the Truckee River. *The mitigation will reduce the loss of recreational opportunities within the operation area by providing a recreational opportunity downstream on the same river and to the same regional recreational users.* SPPC will have the option of providing whitewater flows as defined in Mitigation Measure 9-2 or TMWA may provide off-site mitigation on behalf of the project by implementing Mitigation Measure 9-3. SPPC will notify the SWRCB which mitigation will be implemented at the start of construction of Farad Dam. The funds will be transferred for construction of the whitewater park at the time the Mitigation Measure 9-3 is selected.

The revised Mitigation Measure 9-2 and new Mitigation Measure 9-3 are described below:

Mitigation Measure ~~9-1~~ 9-2: Maintain 1 weekend per month of recreational flows from April ~~to~~ through September, when available

If flows are between 400 and ~~1,700~~ 1,625 cfs in the Truckee River above Floriston, SPPC will not divert water for power generation for the 1st weekend each month from April through September. When flows exceed ~~1,700~~ 1,625 cfs SPPC will maintain a minimum bypass flow of 1,500 cfs. Maintenance of flows on the weekend should be timed such that full flow~~s are achieve (~~400 cfs) is available in the bypass reach by 8 a.m. on Saturday and ~~are~~is not diminished before 5 p.m. on Sunday. SPPC will be required to develop a whitewater boating use monitoring plan subject to approval of the SWRCB that will ~~monitor~~ evaluate future weekend boating use. ~~for a minimum of 2 years; if~~ If whitewater boating ~~use exceeds a use level that results in excessive crowding~~ exceeds a threshold for crowding, as defined in the plan, a second weekend each month of boating flows will be made available. SPPC will provide information to the public by flow-phone or website on when weekend flow releases will be made. To assess the impact of weekend recreational flows on aquatic life, SPPC will be required to develop a plan for monitoring macroinvertebrates and fish. Fish and macroinvertebrates will be monitored for a minimum of 5 years after completion of the dam. If the results of monitoring reveal that weekend whitewater flows have a significant impact on fish and macroinvertebrate health, then the SWRCB will at that time require alternative conditions to protect whitewater boating opportunities. If Mitigation Measure 9-3 is implemented, the fish and macroinvertebrate monitoring will not be required.

This mitigation measure reduces project effects to a less-than-significant level because it will minimize the loss of boating opportunities on the Truckee River, and ensure a regular weekend flow when flows are suitable. Flows will not be suitable in dry years, but will be suitable in most months in normal and wet years.

The minimum flow for kayaking is 400 cfs and the preferred flow is 500 to 2,000 cfs. The minimum flow for rafting is 600 cfs while the preferred flow is 800 to 1,000 cfs, and the high preferred flow is 1,500 cfs. The mitigation was designed to allow a bypass flow that meets kayaking and rafting preferred flows (between 400 and 1500 cfs).

When flows are above 1,625 cfs, SPPC will provide a minimum of 1,500 cfs for boating. This is a combination of 1,500 cfs for boating and 125 cfs for generation. SPPC can use any water available above the maximum 1,500 cfs boating flow for generation. If the flow in the river above Floriston is below 1,625, than all of the water will be bypassed for boating.

Fluctuations of flow once or twice a month could affect invertebrates and fish, and this effect cannot be predicted. However, the ramping and monitoring proposed in Mitigation Measure 6-5 and 9-2 would ensure that the flow requirements will be reevaluated and revised to minimize impacts if an adverse effect is detected. Because anglers are capable of using the Truckee River under

a full range of flows, this mitigation would not adversely affect fishing opportunities, although there may be a slight ~~change~~ decrease in angling success. However, aquatic resources, and thus angling success, will ~~also~~ be protected ~~as part of~~ through ~~implementing~~ implementation of ramping rates (Mitigation Measure 6-5) and the monitoring requirements in Mitigation Measure 9-2.

Regular reliable weekend flows could also result in increased recreational use and crowding on the river. The effect is not expected to be substantial for commercial boaters because the County regulates commercial permits. Private use could result in localized parking issues near the Caltrans shed south of I-80 though there is sufficient parking for approximately 10 vehicles. In the event parking becomes a problem and the County begins receiving complaints, the County may post signage restricting parking.

Mitigation Measure ~~9-1~~ 9-2 would result in restrictions on the project applicant's ability to generate power as indicated in appendix F.

Mitigation Measure 9-3: Contribute funds for the construction of a whitewater recreation park element of the Truckee River Recreation Plan

On behalf of the project, and in lieu of Mitigation Measure 9-2, the TMWA will contribute $1.5 million toward the construction of Phase 1 of the Truckee River Recreation Plan (Truckee River Park @ Wingfield). The money must be used for the construction of a whitewater recreation park on the Truckee River in Reno, Nevada. The funds will be transferred prior to, or concurrent with, commencement of construction of the Farad Dam. At the start of construction, SPPC will notify the SWRCB which mitigation measure they have selected (either Mitigation Measure 9-2 or Mitigation Measure 9-3). If construction of the whitewater park is not completed prior to the completion of the Farad Dam, then Mitigation Measure 9-2 must be implemented until construction of the whitewater recreation park is complete.

A whitewater recreation park in downtown Reno is currently in the planning phases and will be designed, developed, and implemented by multiple agencies including the City of Reno, County of Washoe, U.S. Army Corps of Engineers, TMWA and others. TMWA is contributing to this mitigation measure because they are the likely future owner of the Farad Diversion Dam. Environmental compliance for the whitewater park will occur through the permitting process associated with Section 404 of the Clean Water Act.

This mitigation serves to compensate for the loss of recreational opportunities within the operation area by providing a recreational opportunity downstream on the same river and to the same regional recreational users. The whitewater park will serve as a recreation destination that may increase recreational opportunities compared to those in the operation area.

In the event Mitigation Measure 9-3 is implemented, potential effects on aquatic resources due to ramping will be evaluated as described in Mitigation Measure 6-5.

Recreation 2: Portage

Several commentors were concerned about the ability to avoid the boat/debris chute and portage to a downstream location. SPPC proposes a portage path that will provide access around the facility. Final easements are currently being negotiated with CalTrans. Adequate portage will be required upon completion of construction and will be a condition in the water quality certificate.

The EIR previously stated that portage would be provided during construction. However, because there are limited access opportunities around the construction site and because of safety concerns during construction, portage cannot be provided. Boaters will be able to navigate through the by-pass channel during construction. In addition, construction work is temporary and will occur during periods of low run-off when boating opportunities are limited in this reach. In the context of fishing areas along the Truckee River and the small size of the construction area, restricting access during construction is not expected to result in a significant adverse effect on recreational opportunities.

Selection of Alternatives Master Responses

Alternative 1: Selection of No-Project Alternative

Many commentors indicated that they believed the no-project alternative best achieved the local, state, and federal policies to protect water quality, including protecting fish habitat and providing recreational opportunities.

The SWRCB will consider the project alternatives when it decides whether and how to approve the project. As indicated in the Draft EIR, the environmentally superior alternative is the No-Project Alternative. However, this alternative does not achieve the project objective of restoring flows to the Farad Power Plant for continued power generation. The next most environmentally superior alternative, the one that achieves the project objectives, is the proposed project. The proposed project, with the mitigation measures proposed in the Final EIR, will meet water quality standards, including the protection of beneficial uses.

Alternative 2: Proposed Project over In-Kind Replacement

Several commentors, including the resource agencies, indicated a preference for the proposed project over the in-kind replacement alternative. The in-kind replacement alternative will result in less in river construction, however, it will provide an impediment to boat passage, may not provide the same level of fish passage, and will trap sediment. Over the entire operational life of the project, the proposed project would result in fewer environmental effects when compared to the in-kind replacement.

Cost vs. Public Benefit Master Responses

Cost 1: Environmental Costs versus Public Benefit

Many commentors expressed concern that the environmental costs associated with the replacement of the diversion are too high and indicated that the environmental resources of the Truckee River will be jeopardized by the project. The environmental impacts (i.e., the environmental costs) of the project are fully analyzed and disclosed in the Draft EIR. Any adverse effects on the environment and the beneficial uses of the Truckee River will be avoided or mitigated through the implementation of mitigation measures proposed in the Final EIR.

Cost 2: Cost for Replacement

Many commentors suggested that the cost for replacement, whether subsidized through insurance or not, does not factor in all the environmental costs of the project and does not outweigh the public's use of the Truckee River. CEQA does not require an economic or cost-benefit analysis of a project, thus a detailed financial cost analysis was not prepared. Moreover, any adverse effects on the environment and the beneficial uses of the Truckee River will be avoided or mitigated through the implementation of mitigation measures proposed in the Final EIR.

Cumulative Effects Master Response

Cumulative 1: Use of TROA

This EIR does not tier from or otherwise directly use the cumulative impact section of the TROA Draft EIR/EIS because TROA is still being negotiated and a revised and updated environmental document has not yet been prepared. However, the 1998 TROA Draft EIR/EIS provides some information on possible

overall cumulative effects and is referenced to provide information regarding possible future TROA operations.