



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

In reply refer to:
ER 04/0286, ER 04/0287, ER 04/0288

Ms. Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
Mail Code: ES-1
888 First Street, N.E., Room 11G-1
Washington, D.C. 20426

MAY 27 2004

Subject: Review of Notice of Intent to File an Application for a New License for the Big Creek Nos. 1 and 2 (FERC No. 2175), Big Creek No. 3 (FERC No. 120), and Big Creek Nos. 2A, 8 and Eastwood (FERC No. 67), Hydroelectric Projects, Fresno County, California

Dear Ms. Salas:

The U.S. Fish and Wildlife Service (Service) has reviewed the Federal Energy Regulatory Commission's (Commission) March 12, 2004, notice that the Southern California Edison Company (Edison) has submitted a Notice of Intent to file an Application for a New License for the Big Creek Nos. 1 and 2 (FERC No. 2175), Big Creek No. 3 (FERC No. 120), and Big Creek Nos. 2A, 8 and Eastwood (FERC No. 67) Hydroelectric Projects, Fresno County, California.

During the relicensing process the Service's goal is to ensure that the Federal trust fish and wildlife resources potentially affected by the project will be conserved, protected, and enhanced. We expect to accomplish this goal by recommending measures that would help restore and maintain those ecosystems present in the Big Creek System Basin. We will be reviewing information developed by the applicant from an ecosystem perspective. We will recommend technical studies necessary to determine the physical, chemical and biological conditions essential for maintaining a self-sustaining ecosystem within the Upper San Joaquin River watershed. The following are topics which the Service expects to be addressed in the application materials developed for project relicensing.

General Fish and Wildlife Resources

The watershed areas surrounding and within the boundaries of the three projects support a wide variety of fish, wildlife, and their habitats. Big Creek Nos. 1 and 2 Hydroelectric Project is situated along Big Creek, Big Creek No. 3 Hydroelectric Project is situated on the San Joaquin

TAKE PRIDE
IN AMERICA 

River, and Big Creek Nos. 2A, 8, and Eastwood Hydroelectric Project is situated on the South Fork San Joaquin River, and Big and Stevenson Creeks. Big and Stevenson Creeks are tributaries to the San Joaquin River. All three projects are located within the Sierra National Forest. The applicant will need to provide general information on the wildlife resources occurring in the project area and detailed information about the wildlife and their habitats that are directly, indirectly and cumulatively affected by the Big Creek System projects. Wildlife habitat types within the project vicinity should be identified and mapped. Riparian and wetland habitats are areas of special concern and are of particular interest to the Service because they support diverse and unique terrestrial and aquatic species.

Project features, such as canals, pipelines, and transmission lines, affect lands with diverse populations of wildlife including, but not limited to, black bear, mountain lion, coyote, mule deer, and black-tailed jackrabbit. Amphibians include the foothill yellow-legged frog, mountain yellow-legged frog and Yosemite toad. Reptiles include gopher snake, common garter snake, western rattlesnake and western fence lizard. Mountain and valley quail, mourning dove, Stellar's jay, several species of sparrows, redbelt hawk, American crow and western meadowlark are common birds. Wetland environments support species such as mallard, American coot and great blue heron. Raptors such as the American osprey, American peregrine falcon and the bald eagle are also present in the project area. Location and structural design information about transmission lines will be needed. Compliance with the current raptor protection guidelines provided in "Suggested Practices for Raptor Protection on Power lines: The State of the Art in 1999" must be addressed. Maintenance practices for the transmission lines right-of-way must also be addressed.

The three hydroelectric projects [Big Creek Nos. 1 and 2 (FERC No. 2175), Big Creek No. 3 (FERC No. 120), and Big Creek Nos. 2A, 8 and Eastwood (FERC No. 67)] are located in the Big Creek System Basin in the upper San Joaquin River watershed which affords habitat for native fish species including rainbow trout, hardhead, hitch, Sacramento pikeminnow, Sacramento sucker, threespine stickleback, prickly sculpin, and riffle sculpin. Historically, natural reproduction in project waters has been supplemented by stocking of a variety of fish including golden, rainbow, brown and brook trout, kokanee salmon, largemouth and smallmouth bass to support a recreational sport fishery.

The Application should include proposed measures to avoid adversely affecting fish and wildlife resources. If adverse effects cannot be avoided, then these effects should be minimized and alternative mitigation or compensation should be proposed.

Endangered and Threatened Species

The application should document the presence or absence of any species that are federally listed as endangered, threatened or proposed, that could occur in the project area or be affected directly or indirectly by the project. Upon written request, the Service will provide a list of those species that could potentially occur in the project affected area. To remain current, the applicant should request an updated list every 90 days. The Service will provide guidance to the applicant for

conducting surveys (using Service approved protocols) for determining presence or absence of special status species, and protocols for assessing project effects to ensure compliance with the Federal Endangered Species Act of 1973, as amended (ESA).

The Commission and applicant should be aware that some types of technical studies could adversely affect federally listed or proposed species. Therefore, we expect the Commission and applicant to include in their planning schedule sufficient time for preparation of biological assessments and consultation with the service before proceeding with these types of technical studies

Upon determination that a federal listed or proposed species may be affected by the project, we advise the Commission to contact the service to discuss initiation of consultation under Section 7 of the ESA. At that time, we would expect the Commission to appoint the applicant as a designated, non-Federal representative to enable the applicant to participate in the Section 7 consultation process.

Fish Passage and Protection

Pursuant to Section 18 of the Federal Power Act, any license is subject to mandatory conditions as prescribed by the Secretary of the Interior or of Commerce to provide fish passage within the project affected area. Edison should identify fish passage, protection and enhancement needs in the project affected reaches. The Service may recommend that: (1) fish protection facilities are provided at the diversions and turbine(s), and (2) passage be provided for upstream and downstream migration of fish at any project dam in the Big Creek System Basin.

Streamflow Requirements

The applicant should evaluate the effects of project operations on instream flow and the aquatic environment. Information on the stream hydrology under with-project and without-project conditions will be needed for an adequate effects analysis. Proposals for instream flows in the affected reaches will need to be supported by scientifically acceptable studies such as application of the Service's Instream Flow Incremental Methodology (IFIM) analysis. The Service recommends that water quality and water operations modeling be completed, along with plans for adequate gaging station placement for instream flow studies and monitoring.

Migratory Birds

The applicant will need to determine the presence or absence of migratory birds, including waterfowl within the project area. If present, an evaluation of impacts of the project on these species and their habitats should be conducted. The Service will assist in developing plans to improve migratory bird resting, feeding, and nesting habitat.

Ms. Salas

4

If you have any questions regarding our comments on general fish and wildlife issues, please contact Ms. Deborah Giglio of our Energy Planning and Instream Flow Branch at (916) 414-6759. If you have questions about endangered species issues, please contact Ms. Diane Carney at (916) 414-6600.

Sincerely,

A handwritten signature in black ink that reads "David L. Harlow". The signature is fluid and cursive, with a long horizontal line extending to the right from the end of the name.

David L. Harlow
Acting Field Supervisor

cc:

Commission Service List