

## 6.0 DEVELOPMENTAL ANALYSIS

This developmental analysis evaluates the economic benefits of the existing Project (No Action Alternative) and DWR's Proposal, the estimated costs of these two alternatives, and PM&E measures and their effect on Project economics. This analysis typically evaluates economic benefits and costs of PM&E measures while focusing on power-related impacts and economic considerations. For each alternative considered, the analysis addresses the power benefits and costs derived within the context of DWR continuing to meet its operational requirements, including its water supply and environmental commitments.

This section analyzes the use of available water resources of the Project to generate hydroelectric power after the other commitments noted above are met. It also provides estimates of the economic benefits of the Project and of the costs for proposed PM&E measures included in DWR's Proposal, and quantifies the effects of these measures on Project operations.

Under DWR's Proposal, DWR does not propose any modifications to the Project's power generation plants under the new license. DWR's Proposal does propose to continue to operate and maintain the Project for electric power generation under the terms and conditions of any new license issued by FERC. However, capacity and average annual gross power generation under DWR's Proposal would be substantially similar to that of the No Action Alternative; DWR's Proposal would not reduce power generation because the PM&E measures do not affect Project operations.

### 6.1 ALTERNATIVES CONSIDERED

DWR considered the following two alternatives:

- No Action Alternative. This is the current operation of the Project under its existing license conditions and operations. Under the No Action Alternative, the inflow to the Project and downstream water demands are the same as they have been historically. Under the No Action Alternative, there are no changes to existing Project facilities or operations. Costs under the No Action Alternative are DWR's best estimate of the costs to operate the Project in the future.
- DWR's Proposal. This is DWR's proposed Project, including DWR's proposed mitigation and enhancement (PM&E) measures, which is described in DWR's license application. Costs under DWR's Proposal are similar to the costs under the No Action Alternative, with the exception of DWR's proposed changes to the PM&E measures.

## 6.2 POWER AND DEVELOPMENTAL BENEFITS

### 6.2.1 Method of Economic Analysis

Under FERC’s approach to evaluating the economics of hydropower projects as articulated in FERC’s Order Issuing a New License to the Mead Corporation (FERC 1995), the methodology is a “current cost approach” in that all costs are presented in current dollars (e.g. no consideration for potential future power costs, inflation, escalation, or deflation beyond the license issuance date; and costs to be expended over the license term are summed and normalized as current dollars). FERC’s current cost economic analysis provides a general estimate of the potential developmental benefits and costs and non-developmental benefits and costs of a project. DWR has prepared this section using FERC’s current cost methodology.

Basic economic assumptions used by DWR in developing costs and benefits under both the No Action Alternative and DWR’s Proposal are summarized in Table 6.2-1.

**Table 6.2-1. Economic Assumptions DWR Used in Developing Costs and Power Benefits under the No Action Alternative and DWR’s Proposal**

Assumption	Value
Dollars	United States (U.S.) dollars to the nearest \$1,000
Period of Analysis	30 Years
Term of Financing	30 Years
Insurance Rate	0%
Base Year for Costs and Benefits	Calendar Year 2018
Interest Rate	2.0%
Discount Rate	5.0%

While FERC’s current cost approach requires an applicant to base costs in Exhibit D on a 30-year license term, DWR requests from FERC a new license with a term of 50 years.

### 6.2.2 Cost of Operations and Benefits

#### 6.2.2.1 *No Action Alternative*

DWR estimates that, based on historical expenditures, the average annual operating and maintenance (O&M) cost under the No Action Alternative is approximately \$27,015,000. The estimated average annual cost includes four components: (1) \$20,754,000 incurred by DWR for O&M, station power, annual renewals and replacements, major infrastructure repairs/improvements and capital components; (2) \$4,949,000 incurred by the California Department of Parks and Recreation (DPR) for O&M of Project recreation facilities within the Silverwood Lake State Recreation Area

(SRA); (3) \$372,000 by DWR in miscellaneous recreation costs; and (4) \$500,000 by DWR for implementation of environmental measures. In addition, under the No Action Alternative, DWR intends to recover its cost to obtain a new license for the Project. DWR estimates this cost is \$13,200,000 (i.e., \$440,000 annually over 30 years), which includes all study costs, Traditional Licensing Process costs, cost related to obtaining Clean Water Act Section 401 Water Quality Certification, and personnel and administrative costs associated with processing. As a State of California agency, DWR is not subject to payment of any State, local, or federal taxes associated with the Project.

The Project's installed and dependable capacity under the No Action Alternative are 272,796 kilowatts (kW) and 250,100 kW, respectively. DWR calculated dependable capacity by multiplying the Devil Canyon Powerplant's average monthly Resource Adequacy (RA) data for 2013 through 2017 by the yearly RA capacity. DWR used the California Public Utility Commission's (PUC) 2017RARReport.pdf report file multiplied the local Los Angeles Basin area RA price by the annual RA average capacity to estimate the yearly benefit of dependable capacity.

The Project generates on average 836,000 megawatt-hours (MWh) or energy annually. This is based on multiplying the Project's installed capacity by the reported Devil Canon Powerplant operating availability average of 89.31 percent for the 2010 through 2017 period. DWR allocated the daily generation values among the California Independent System Operator (CAISO) definition for peak energy, partial peak energy, off-peak energy, and super off-peak energy to calculate generation in each of these periods. The value of the generation in each period was based on the monthly Locational Marginal Price (LMP) forecast.

The Project provides ancillary services to CAISO in the form of regulation-up, regulation-down and spinning reserves. The amount of these services in terms of MWh was averaged over the 2015 through 2017 period. The value of the ancillary service was based on the monthly LMP price for these services. Capacity, energy and ancillary service values under the No Action Alternative are provided in Table 6.2-2.

**Table 6.2-2. Average Annual Project Power Under the No Action Alternative<sup>1</sup>**

Value	No Action Alternative
<b>Annual Capacity</b>	
Installed (kW)	272,796
Dependable (kW)	250,100
<b>Total Average Annual Value of Capacity (2018 U.S. Dollars)</b>	<b>\$3,067,000</b>
<b>Average Annual Energy</b>	
Peak Energy (MWh)	203,500
Partial Peak Energy (MWh)	32,100
Off-Peak Energy (MWh)	526,200
Super Off-Peak (MWh)	74,200
<b>Total Average Annual Value of Energy (2018 U.S. Dollars)</b>	<b>\$27,623,000</b>
<b>Average Annual Ancillary Services</b>	
Regulation-Up (MWh)	98,850
Regulation-Down (MWh)	102,447
Spinning Reserve (MWh)	194,810
<b>Total Average Annual Value of Ancillary Services (2018 U.S. Dollars)</b>	<b>\$3,069,000</b>
<b>Total Project Power Value (2018 U.S. Dollars)</b>	<b>\$33,759,000</b>

Note:

<sup>1</sup>Refer to Section 6.2.1 regarding how DWR calculated the values in this table.

Key:

DPR = California Department of Parks and Recreation

kW = kilowatt

MWh = megawatt hours

### **6.2.2.2 DWR's Proposal**

DWR estimates that the average annual O&M cost under DWR's Proposal is approximately \$27,136,000. Under DWR's Proposal, the non-environmental and recreation average annual cost of \$20,754,000, the average annual cost of \$4,949,000 incurred by DPR, and the average annual cost of \$440,000 for recovery of relicensing costs under the No Action Alternative would not change because DWR's Proposal includes no significant changes to non-environmental and recreation O&M, DPR would continue to O&M the Project recreation facilities that are part of the Silverwood Lake SRA, and DWR would recover its relicensing costs. In contrast, under DWR's Proposal, the \$500,000 DWR expends annually under existing conditions for environmental measures would increase by \$493,000 for implementation of the 11 DWR proposed measures for a total of \$993,000. Table 6.2-3 shows DWR's estimated costs for implementation of its proposed measures under DWR's proposal.

**Table 6.2-3. DWR’s Estimated Costs Related to Implementation of DWR’s Proposed Measures<sup>1</sup>**

DWR’s Proposed Measure		Total Capital Cost Over 30 Years (2018 U.S. Dollars)	Total O&M Cost Over 30 Years (2018 U.S. Dollars)	Annualized Cost Over 30 Years <sup>2</sup> (2018 U.S. Dollars)
Designation	Description			
<b>Environment Related Measures</b>				
GS1	Implement Erosion and Sediment Control Plan	\$0	\$0	\$0 <sup>3</sup>
WR1	Maintain Silverwood Lake Elevations	\$0	\$0	\$0
WR2	Implement Hazardous Materials Management Plan	\$0	\$0	\$0 <sup>3</sup>
AR1	Implement Silverwood Lake Fish Stocking Measure	\$0	\$0	\$0 <sup>4</sup>
AR2	Implement Aquatic Invasive Species Management Plan	\$0	\$7,891,000	\$263,000
TR1	Implement Integrated Vegetation Management Plan	\$0	\$988,000	\$33,000
LU1	Implement Transportation System Management Plan	\$0	\$3,450,000	\$115,000
LU2	Implement Fire Prevention and Response Plan	\$0	\$60,000	\$2,000
LU3	Develop and Implement Project Safety Plan	\$0	\$60,000	\$2,000
VR1	Implement Visual Resources Management Plan	\$0	\$30,000	\$1,000
CR1	Implement Historic Properties Management Plan	\$0	\$2,296,000	\$77,000
<b>Total</b>		<b>\$0</b>	<b>\$14,775,000</b>	<b>\$493,000</b>

Notes:

<sup>1</sup>Refer to Appendix A for the complete text of each of DWR’s proposed measures. DWR intends to include a Recreation Management Plan in its FLA.

<sup>2</sup>Total annualized costs are calculated by summing Capital Cost and Total O&M Cost, and dividing the sum by 30.

<sup>3</sup>DWR will include the cost for implementing this measure in the cost of a specific project when DWR proposes that project.

<sup>4</sup>This measure is substantially the same as the fish stocking and creel survey condition in the existing license. Therefore, no additional costs are estimated to implement the measure.

Key:

O&M = Operation and Management

U.S. = United States

DWR does not propose to add or remove generation facilities from the Project, and proposes to operate the Project as it has been operated historically. Therefore, under DWR’s Proposal, the amount and value of the Project’s capacity, energy and ancillary

services will not change from the amounts and values under the No Action Alternative shown in Table 6.2-3.

### 6.3 COMPARISON OF ALTERNATIVES

Table 6.3-1 compares the annual Project benefits and cost of the No Action Alternative and DWR’s Proposal.

**Table 6.3-1. Comparison of Average Annual Power Benefits<sup>1</sup> and Costs between the No Action Alternative and DWR’s Proposal**

Value	No Action Alternative	DWR’s Proposal	Change <sup>1</sup>
<b>Average Annual Gross Benefits (2018 U.S. Dollars)<sup>2</sup></b>			
Capacity	\$3,067,000	\$3,067,000	\$0
Energy	\$27,623,000	\$27,623,000	\$0
Ancillary Services	\$3,069,000	\$3,069,000	\$0
<b>Total Gross Benefits</b>	<b>\$33,759,000</b>	<b>\$33,759,000</b>	<b>\$0</b>
<b>Average Annual Costs (2018 U.S. Dollars)<sup>3</sup></b>			
Non-Environmental / Recreation O&M Costs	\$20,754,000	\$20,754,000	\$0
DPR Costs for O&M of Project Recreation Facilities	\$4,949,000	\$4,949,000	\$0
Recovery of Relicensing Costs	\$440,000	\$440,000	\$0
Other Recreation Costs	\$372,000	\$0 <sup>4</sup>	-\$372,000
Environmental Costs	\$500,000	\$993,000	\$493,000
<b>Total Costs</b>	<b>\$27,015,000</b>	<b>\$27,136,000</b>	<b>\$121,000</b>
<b>Average Annual Net Benefits (2018 U.S. Dollars)<sup>5</sup></b>			
Net Benefits	\$6,744,000	\$6,623,000	\$121,000

Note:

<sup>1</sup>Calculated by subtracting the No Action Alternative from the Proposed Project value.

<sup>2</sup>Refer to Section 6.2 for source of Average Annual Benefits.

<sup>3</sup>Refer to Section 6.1 for Average Annual Costs.

<sup>4</sup>Stakeholder discussions are still ongoing with a goal of finalizing a recreation plan. The plan and associated costs will be included in the FLA.

<sup>5</sup>Calculated by subtracting Average Annual Cost from the Average Annual Gross Benefits.

Key:

DPR = California Department of Parks and Recreation

kW = kilowatt

MWh = megawatt hours

PM&E = Protection Mitigation and Enhancement

In summary, DWR’s Proposal would not affect Project power, but would increase Project costs by \$121,000, thereby reducing the net Project benefit from \$6,744,000 to \$6,623,000, or by 1.8 percent.

## **6.4 OTHER DEVELOPMENTAL AND NON-DEVELOPMENTAL BENEFITS**

### **6.4.1 Recreation**

Recreational amenities, such as shoreline access, parking, restrooms, camping, picnicking, and fishing are available at Silverwood Lake, which is included in the Devil Canyon Project facilities. (On May 20, 2016, DWR submitted to FERC an update to its Recreation Plan, including facility and amenity tables and updated recreation maps.)

At the Normal Maximum Water Surface Elevation of 3,355 feet, Silverwood Lake has a storage capacity of 75,000 acre-feet (AF), a usable storage capacity of 33,820 AF, a surface area of 962.0 acres, and a shoreline length of approximately 13 miles. Article 58 of the existing FERC license requires DWR to maintain Silverwood Lake surface elevations at the highest, most practicable level commensurate with other Project purposes during the summer recreation season.

Silverwood Lake is primarily a warm-water fishery, consisting of largemouth bass, bluegill, black crappie, striped bass, channel catfish, and white catfish. A cold-water fishery is maintained by stocking hatchery-raised trout.

In addition to being popular with boaters and anglers, Silverwood Lake and its surrounding shoreline, which make up the Silverwood Lake State Recreation Area (SRA), are popular with swimmers, campers, hikers, bikers, and picnickers, particularly during the summer months. Silverwood Lake SRA recreation facilities include: campgrounds, a nature center, picnic areas, boat launches, a marina, and swim beaches.

### **6.4.2 Water Diversions**

As stated above, the revenue from the Project's power generation offsets the cost of delivering water to southern California, keeping water costs more affordable in the region and preserving economic vitality and quality of life for residents.

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## **7.0 COMPREHENSIVE AND OTHER RELEVANT PLAN ANALYSIS**

This section compares the developmental and non-developmental effects of DWR's No Action Alternative and DWR's Proposal.

### **7.1 COMPREHENSIVE DEVELOPMENT AND RECOMMENDED ALTERNATIVE**

Sections 4(e) and 10(a) of the FPA (16 U.S.C. §§ 797[e] & 803[a]) require that FERC give equal consideration to all uses of the waterway on which a project is located. When FERC reviews a hydropower project, it considers the water quality, fish and wildlife, recreational, and other non-developmental values of the involved waterway equally with its electric energy and other developmental values. Accordingly, any license issued will be best adapted to a comprehensive plan for improving or developing a waterway or waterways for all beneficial public uses.

### **7.2 CONSISTENCY WITH COMPREHENSIVE PLANS**

Section 10(a)(2)(A) of the FPA (16 U.S.C. § 803[a][2][A]) requires FERC to consider the extent to which a project is consistent with federal and state comprehensive plans for improving, developing, or conserving waterways affected by the project. On April 27, 1988, FERC issued Order No. 481A, which requires FERC to give FPA Section 10(a)(2)(A) comprehensive plan status to any federal or State plan that meets each of the following three criteria: (1) it is a comprehensive study of one or more of the beneficial uses of a waterway or waterways; (2) it specifies the standards, the data, and the methodology used to develop the plan; and (3) it is filed with FERC.

FERC's Revised List of Comprehensive Plans, dated January 2018, can be found at FERC's eLibrary (<http://www.ferc.gov/industries/hydropower/gen-info/licensing/complan.pdf>). A review of this list on August 24, 2018, shows that FERC has listed, under FPA Section 10(a), 76 comprehensive plans for the State of California. Thirteen of those plans are pertinent to DWR's Proposal and are, therefore, considered qualifying plans. As required by 18 CFR § 5.18(b)(5)(ii)(F), this section provides an explanation of how and why DWR's Proposal would, would not, or should not comply with each of the qualifying plans, or in some cases, directs the reader to the appropriate section of the Application for New License for an in-depth discussion of compliance with the plan. To facilitate FERC's review, the plans are discussed below in the order presented by FERC in its current Revised List of Comprehensive Plans. The full reference for each plan is also provided.

California Department of Fish and Game. U.S. Fish and Wildlife Service. 2010. Final Hatchery and Stocking Program Environmental Impact Report/Environmental Impact Statement. Sacramento, California. January 2010.

This jointly prepared document considers the environmental effects of several alternative hatchery management schemes that would direct management of federal and State hatcheries, and related stocking programs and associated activities, in

California. The preferred alternative will allow CDFW to continue stocking fish for the express purpose of providing recreational opportunities to anglers. This alternative provides a mechanism for CDFW to implement guidelines that will allow for the protection of native species by identifying any such species prior to continuation of stocking. The pre-stocking evaluation protocol includes steps to provide for restoration of native species in those areas where stocking is not consistent with CDFW's goals to manage and protect multiple species. This alternative also provides a mechanism for continuing to improve the management of CDFW-operated anadromous hatcheries to minimize impacts on salmon and steelhead, as well as other native species. The alternative includes steps to reduce impacts from the private stocking permit program by eliminating permit exclusions and requiring certification for hatchery operations, as well as by providing for species surveys at planting locations. This is also the USFWS' preferred alternative, and is the NEPA Environmentally Preferable Alternative. The plan does not include any specific recommendations regarding the surface waters in the vicinity of the Project, and DWR's Proposal does not include a hatchery.

California Department of Fish and Game. 2007. California Wildlife: Conservation Challenges, California's Wildlife Action Plan. Sacramento, California. 2007.

In response to the State Wildlife Grant Program enacted by Congress in 2000, CDFW partnered with the Wildlife Health Center at the University of California Davis to develop California's Wildlife Action Plan, entitled *California Wildlife Conservation Challenges*. California's Wildlife Action Plan is directed at answering three primary questions:

1. What are the species and habitats of greatest conservation need?
2. What are the major stressors affecting California's native wildlife and habitats?
3. What are the actions needed to restore and conserve California's wildlife, thereby reducing the likelihood that more species will approach the condition of threatened or endangered?

The document concludes that CDFW's species of special concern have the greatest need of conservation; this "Special Animals List" consists of 140 avian species, 127 mammals, 102 fishes, 43 reptiles, 40 amphibians, and 365 invertebrates. It also concludes that in California's nine bioregions—Mojave Desert, Colorado Desert, South Coast, Central Coast, North Coast-Klamath, Modoc Plateau, Sierra Nevada and Cascades, Central Valley and Bay-Delta, and Marine Region—the major stressors to California's native wildlife and habitats consist of growth and development, water management conflicts, invasive species, and climate change. With respect to actions needed to restore and conserve California's wildlife, 11 statewide conservation actions were recommended, as well as specific conservation actions for each of the 9 regions in California.

California Department of Fish and Game. 2003. Strategic Plan for Trout Management: A Plan for 2004 and Beyond. Sacramento, California. November 2003.

This plan identifies key issues and concerns relative to trout resources and fisheries in California, and develops goals and strategies that will address these issues during the next decade. The plan guides and enables trout managers to meet public trust responsibilities of protecting and maintaining California's heritage of native trout and other aquatic resources; emphasizing the use of sound ecosystem management principles. It provides for diverse angling and recreational opportunities; and encourages increasing the general public's appreciation and awareness of trout and their habitats. The scope of the plan includes all resident (non-anadromous) forms of salmonids, including landlocked steelhead, resident coastal cutthroat trout, and inland salmon. Presently, there are 11 native species or forms of trout in California, and three non-native species of trout. The plan supports a strategy that calls for an ecosystem (i.e., watershed) approach, and includes strategies that recognize interactions between trout and other aquatic species. This approach is consistent with an ecosystem management strategy stipulated in the CDFW's department-wide strategic plan. The goals and strategies presented in this plan have been developed around two themes that reflect the general mission of CDFW: (1) habitat and native species protection and management; and (2) public use, in this case, recreational angling. The plan does not include any specific recommendations regarding the surface waters in the vicinity of the Project.

California Department of Fish and Wildlife. 2008. California Aquatic Invasive Species Management Plan. Sacramento, California. January 18, 2008.

This California Aquatic Invasive Species Management Plan was released by CDFW in January 2008. Recreational equipment and activities have been identified as vectors for distributing some AIS and this plan proposes management actions for addressing AIS threats to the State. It focuses on the non-native algae, crabs, clams, fish, plants, and other species that continue to invade California's creeks, wetlands, rivers, bays, and coastal waters. The main purpose of the plan is to coordinate State programs, create a statewide decision-making structure, and provide a shared baseline of data and agreed-upon actions so that State agencies may work together more efficiently. In addition, the plan provides the State's first comprehensive, coordinated effort to prevent new invasions, minimize impacts from established AIS, and establish priorities for action statewide. Finally, the plan supports the State's first rapid response process for high-risk invaders and applies to Silverwood Lake.

California Department of Parks and Recreation. 1998. Public Opinions and Attitudes on Outdoor Recreation in California. Sacramento, California. March 1998.

DPR's SOPA, the most recent version of which is dated 2012, provides information used in the development of the DPR's SCORP. The SOPA identifies: (1) California's attitudes, opinions, and values with respect to outdoor recreation; and (2) demand for, and participation in, 42 selected outdoor recreation activities. Broad generalizations contained in the document include:

- Outdoor recreational areas and facilities are very important to the quality of life of most Californians
- Californians are fairly well satisfied with the areas and facilities currently available
- Californians spent approximately 2.2 billion days participating in outdoor recreation activities during 1997
- Californians engage in simple and inexpensive activities far more than those which require considerable skill and expense
- Californians do not show a strong willingness to pay for the recreational areas and facilities they use or desire
- Californians strongly believe that protection of the natural environment is an important aspect of outdoor recreation

The plan does not include any specific recommendations regarding the Project or the area within the proposed Project boundary.

California Department of Parks and Recreation. 1994. California Outdoor Recreation Plan. Sacramento, California. April 1994.

The objectives of DPR's SCORP, the most recent version of which is dated 2015, are to determine outdoor recreation issues that are currently the problems and opportunities most critical in California, and to explore the most appropriate actions by which State, federal, and local agencies might address these issues. The SCORP also provides valuable information on the State's recreation policy, code of ethics, and statewide recreation demand, demographic, economic, political and environmental conditions. The plan lists the following major issues: (1) improving resource stewardship; (2) serving a changing population; (3) responding to limited funding; (4) building strong leadership; (5) improving recreation opportunities through planning and research; (6) responding to the demand for trails; and (7) halting the loss of wetlands. The plan does not include any specific recommendations regarding the Project or the area within the proposed Project boundary.

California Department of Water Resources. 1994. California Water Plan Update. Bulletin 160-93. Sacramento, California. October 1994. Two Volumes and Executive Summary.

DWR first published the California Water Plan in 1957. The original plan focused on the quantity and quality of water available to meet the State's water needs, and management actions that could be implemented to improve the State's water supply reliability. Since then, DWR has updated the plan numerous times, including in 1983 (the reference used in FERC's List of Comprehensive Plans for the California Water Plan) and 1994 (the reference used in FERC's List of Comprehensive Plans for the California Water Plan Update).

California State Water Resources Control Board. 1995. Water Quality Control Plan Report. Sacramento, California. Nine Volumes.

This reference is to the first edition of the water quality control plans adopted by the SWRCB pursuant to the CWA. The nine plans, which apply to different regions of California, formally designate existing and potential beneficial uses and WQOs. The northern part of the Project lies within the Lahontan RWQCB's planning territory and the southern part is within the Santa Ana RWQCB's territory. Both agencies have issued basin plans, but only the Lahontan RWQCB Basin Plan identifies designated beneficial uses for surface waters potentially affected by the Project. The SWRCB has amended the water quality control plans several times since 1995, with the most recent amendment of the Lahontan RWQCB Basin Plan in November 2010. Refer to Section 1.0 for a description of the CWA and designated beneficial uses in the Lahontan RWQCB Basin Plan.

USFS. 2005. San Bernardino National Forest Land and Resource Management Plan. Department of Agriculture, San Bernardino, California. September 2005.

The Forest and Rangeland Renewable Resources Planning Act requires that each national forest prepare an initial forest plan that provides direction for the efficient use and protection of forest resources within their administrative boundaries. The revised land and resource management plans for the southern California national forests, including the SBNF, were published in 2005 and describe the strategic direction at the broad program level for managing the land and its resources. Part 1 is the vision for the southern California national forests. It describes the forests' uniqueness on a national and regional level. It describes USFS' national goals, the roles and contributions of national forests, the desired conditions for the various landscapes within national forests, and evaluation/monitoring indicators used to assess progress made toward accomplishing the desired conditions.

Part 2 is the strategy. It describes the objectives that USFS intends to implement in order to move the forests toward the vision described in Part 1. The national forests have been subdivided into geographic areas called "places." The Silverwood Place is a landscape consisting of unique desert-influenced and riparian ecosystems, for the Mojave River from Silverwood Lake to Deep Creek. Rapidly growing, high desert urban

communities flank the lower reaches, sending visitors in search of leisure opportunities at the Silverwood Lake SRA. Important habitat exists here in the north-facing hillsides for the bald eagle and California spotted owl. Critical habitat for arroyo toad also occurs on Deep Creek. Part 3 is the design criteria. It includes laws, standards, and other guidance that USFS uses during project planning and implementation.

National Park Service. The Nationwide Rivers Inventory. Department of the Interior, Washington, D.C. 1993.

The Nationwide Rivers Inventory (NRI) is a listing by the NPS of more than 3,400 free-flowing river segments in the United States that are believed to possess one or more “outstandingly remarkable” natural or cultural values judged to be of more than local or regional significance. In addition to these eligibility criteria, river segments are divided into three classifications: Wild, Scenic, and Recreational river areas. Under a 1979 Presidential Directive and related Council on Environmental Quality procedures, all federal agencies must seek to avoid or mitigate actions that would adversely affect one or more NRI segments. Such adverse impacts could alter the river segment’s eligibility for listing and/or alter their classification.

The following river reaches in San Bernardino County have been listed on the NRI:

- An 11-mile reach of the Colorado River from the upper end of Lake Havasu to the Interstate Highway 40 crossing was listed in 1982. This pristine stretch of river flows through the scenic Topock Gorge and the Havasu National Wildlife Refuge.
- Four reaches of Deep Creek, totaling 19 miles, were listed as recreation/scenic in 1993.
- Two reaches of Lytle Creek, totaling 8 miles, were listed in 1993. The Middle Fork, from its source within the Cucamonga Wilderness downstream to the wilderness boundary, was listed as scenic. The 5-mile-long South Fork Lytle Creek was also listed as scenic.
- Two reaches of the Santa Ana River, totaling 17 miles, were listed as scenic/recreation in 1993. The 3-mile-long scenic reach, between Filaree Flat and Bear Creek, contains an outstanding native trout fishery. The 14-mile-long recreation reach, between Heart Bar and Filaree Flat, receives high levels of recreation use.
- Four miles of the South Fork Santa Ana River were listed as wild in 1993. This reach receives high levels of recreation use.
- Eight miles of Bear Creek, a tributary to the Santa Ana River, was listed as wild in 1993.

- Four reaches of the Whitewater River, totaling 15 miles, were listed as wild in 1993.

No Wild, Scenic, or Recreational river designations occur in the Project vicinity.

State Water Resources Control Board. 1999. Water Quality Control Plans and Policies Adopted as part of the State Comprehensive Plan. April 1999.

This citation in FERC's List of Comprehensive Plans refers to an April 1999 submittal by the SWRCB to FERC of a listing of all SWRCB plans and policies. The transmittal referenced that all of the listed plans and policies are part of the "State Comprehensive Plan," even though it does not exist as a single plan. As described above, the most pertinent SWRCB plan or policy that applies to the Project is the Lahontan Basin Plan.

U.S. Fish and Wildlife Service. Canadian Wildlife Service. 1986. North American Waterfowl Management Plan. Department of the Interior. Environment Canada. May 1986.

The North American Waterfowl Management Plan (NAWMP) is an update of the Convention for the Protection of Migratory Birds, which was established between the United States and Canada in 1916. The plan is a guide for private and public entities in the conservation and management of waterfowl. Goals and general recommendations are described for the protection of habitat, financing of research, and managing harvest. The plan outlines a framework for separating the larger group of waterfowl into smaller guilds, dabbling ducks, diving ducks, sea ducks, and geese, which will benefit from similar management strategies. The NAWMP leaves implementation to local conservation and management groups.

U.S. Fish and Wildlife Service. n.d. Fisheries USA: The Recreational Fisheries Policy of the U.S. Fish and Wildlife Service. Washington, D.C.

Fisheries USA: The Recreational Fisheries Policy of the U.S. Fish and Wildlife Service is a 12-page policy that was signed by John F. Turner, then-Director of USFWS, on December 5, 1989. Its purpose is to unite all of the USFWS' recreational fisheries capabilities under a single policy to enhance the nation's recreational fisheries. Regional and Assistant directors are responsible for implementing the policy by incorporating its goals and strategies into planning and day-to-day management efforts. USFWS carries out this policy relative to FERC-licensed hydroelectric projects through such federal laws as the Fish and Wildlife Coordination Act, the CWA, the ESA, NEPA, and the FPA, among others. The plan does not include any specific recommendations regarding the Project or the area within the proposed Project boundary.

### 7.3 OTHER RELEVANT MANAGEMENT PLANS

In addition to the qualifying federal and State comprehensive waterway plans listed in Section 7.2, some agencies have developed resource management plans to help guide resource management actions regarding specific resources of interest potentially affected by the Project. These resource management plans are discussed below.

California Department of Parks and Recreation. 1970. Silverwood Lake State Recreation Area General Development Plan 2nd Revision. Sacramento, California. June 1972.

Silverwood Lake State Recreation Area General Development Plan 2nd Revision, developed by DPR, describes the need for recreation in southern California and how Silverwood Lake provides a unique location that is important for this purpose. This is relevant to the Project because a portion of the Project is within the Silverwood Lake SRA. This plan also developed carrying capacity information for boating on Silverwood Lake, which continues to help guide use for the safety and enjoyment of recreationists.

San Bernardino County. 2007. County of San Bernardino 2007 General Plan. San Bernardino, California. February 2008.

The San Bernardino County General Plan provides guidance for the future, regarding both growth and development. The General Plan addresses relevant resource areas related to the Project, including land use, air quality, conservation and natural resources, parks and recreation, and noise. The State is not subject to local government jurisdiction and thus not required to follow the plan, but to the extent Project operations can be consistent with the principles, goals, and objectives described in the county plan, relevant aspects of the plan have been considered by DWR.

South Coast Air Quality Management District. 2013. Final 2012 Air Quality Management Plan. Diamond Bar, California. February 2013.

The Final 2012 Air Quality Management Plan was developed by the South Coast Air Quality Management District to help the South Coast Air Basin continue the trend of air quality improvement and to meet Federal Clean Air Act standards. This plan is considered relevant to the Project because the South Coast Air Basin has jurisdiction over the area within the proposed Project boundary.

United States Fish and Wildlife Service. 1999. Arroyo Southwestern Toad (*Bufo Microscaphus Californicus*) Recovery Plan. Portland, Oregon. July 1999.

USFWS developed the Arroyo Toad Recovery Plan to outline reasonable actions it believes are required to recover and protect the arroyo toad. This plan is relevant because habitat (i.e., not designated critical habitat) for the arroyo toad is known to occur within the proposed Project boundary around Silverwood Lake.



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None.

### **8.4 REFERENCES CITED – SECTION 4.0 SCOPE OF CUMULATIVE EFFECTS ANALYSIS**

None.

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#### **8.6 REFERENCES CITED – SECTION 6.0 DEVELOPMENTAL ANALYSIS**

None.

**8.7 REFERENCES CITED – SECTION 7.0 COMPREHENSIVE AND OTHER  
RELEVANT PLAN ANALYSIS**

None.