CONSERVATION GROUPS’ COMMENTS REGARDING REVISED STUDY PLAN FOR THE LA GRANGE PROJECT

The Conservation Groups provide these comments in response to Modesto and Turlock Irrigation Districts’ (Districts) Revised Study Plan for the La Grange Hydroelectric Project (P-14581) (see eLibrary no. 20150105-5165). We thank the Districts for the progress between the preliminary studies list in the Pre-Application Document and Revised Study Plan, most notably the Districts’ agreement to undertake a Fish Passage Assessment Study. We look forward to participating in the periodic consultation workshops provided in this study plan and otherwise cooperating with the Districts in the implementation of this study. We also thank the Districts for incorporating several elements recommended by the Conservation Groups into the Recreation Access and Safety Assessment.

We request that Office of Energy Projects (OEP) Staff consider the remainder of our study recommendations as stated in our initial study requests1 and comments on the Updated Study Plan2 to the extent those recommendations were not accepted by the Districts in the Revised Study Plan. For example, we continue to recommend that the Districts’ Recreation Access and Safety Assessment consider existing recreational use at the Project regardless of whether this information is primarily anecdotal.3 We continue to believe that further study of Project impacts on water hyacinth growth is warranted as it affects the beneficial uses of water supply, recreation, and aquatic habitat.4 Staff has stated that it will evaluate the effects of the project on growth of water hyacinth,5 and the Districts do not dispute that there is no existing information on this issue. We also continue to recommend that the Districts be required to provide additional information regarding existing structures in the river that may interfere with recreation and fish passage at the Project.6

3 Study Requests, pp. 6-7.
4 USP Comments, pp. 8-12.
6 Study Requests, pp. 4-5.
We thank OEP Staff for considering these comments.

Dated: January 20, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

La Grange Hydroelectric Project (P-14581)

I, Nicholas Niiro, hereby certify that I have this day served the foregoing document, “Conservation Groups’ Comments Regarding Revised Study Plan for the La Grange Project,” on each person designated on the official service lists compiled by the Secretary in the P-14581-000 docket.

Dated: January 20, 2015

By:

[Signature]

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