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Regulatory Compliance
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March 27, 2020

Electronically Filed

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, Northeast
Washington, DC 20426

FERC Project No. 2426—South SWP Hydropower FLA Errata—Recreation Management Plan Cost and Proposed Project Boundary Acreage Update

Dear Ms. Bose:

By letter dated January 30, 2020, the California Department of Water Resources (DWR) and Los Angeles Department of Water and Power (LADWP) (Licensees) filed with the Federal Energy Regulatory Commission (FERC) their Final Application for New License for Major Project—Existing Dam for the South SWP Hydropower, FERC Project Number 2426-227 (Project).

The Licensees identified typographic errors in the reported costs associated with implementing the proposed Recreation Management Plan and in the proposed Project boundary acreages included in the Final License Application (FLA).

Recreation Management Plan Costs

The error identified in Exhibit D and Exhibit E is related to the cost associated with implementation of the Recreation Management Plan. The FLA states the total operations and maintenance (O&M) cost over 30 years to implement the Recreation Management Plan is \$10,040,000, when the correct cost should be \$41,540,000.

The specific corrections in Exhibit D and Exhibit E are as follows:

Exhibit D; Section 6.1.2; Page Number 6-3: Table 6.1-1 *Licensees' Estimated Costs in 2019 Dollars Related to Implementation of Licensees' Proposed Conditions*. The table has been updated to show the correct costs for the Recreation Management Plan and the total O&M cost for all proposed measures. The corrected Table 6.1-1 is below.

Table 6.1-1 Licensees' Estimated Costs in 2019 Dollars Related to Implementation of Licensees' Proposed Conditions.

Licensees' Proposed Condition		Total Capital Cost Over 30 Years ^{1, 2} (2019 U.S. Dollars)	Total O&M Cost Over 30 Years (2019 U.S. Dollars)	Annualized Cost Over 30 Years ³ Excluding Energy (2019 U.S. Dollars)
Designation	Description			
Environment-Related Measures				
GS1	Implement the Erosion and Sediment Control Plan	\$0	\$0	\$0
WR1	Implement Pyramid Lake Water Surface Elevation Restrictions	\$0	\$450,000	\$15,000
WR2	Implement the Hazardous Materials Management Plan	\$0	\$150,000	\$5,000
AR1	Implement Flow Releases into Pyramid Reach	\$0	\$450,000	\$15,000
AR2	Implement Pyramid Lake Fish Stocking Measure	\$0	\$8,806,000	\$294,000
TR1	Implement the Integrated Vegetation Management Plan	\$0	\$916,500	\$30,550
TR2	Implement the Sensitive Aquatic and Terrestrial Wildlife Management Plan	\$0	\$1,634,000	\$54,467
LU1	Implement the Fire Prevention and Response Plan	\$0	\$450,000	\$15,000
LU2	Implement a Project Safety Plan	\$0	\$60,000	\$2,000
VR1	Implement the Visual Resources Management Plan	\$0	\$157,000	\$5,233
CR1	Implement the Historic Properties Management Plan	\$0	\$3,503,000	\$117,000
Subtotal		\$0	\$16,576,500	\$553,250

Table 6.1-1 Licensees' Estimated Costs in 2019 Dollars Related to Implementation of Licensees' Proposed Conditions (Continued).

Recreation-Related Measures				
RR1	Implement the Recreation Management Plan	\$0	\$41,540,000	\$1,384,667
Subtotal		\$0	\$41,540,000	\$1,384,667
Total		\$0	\$58,116,500	\$1,937,917

Notes:

¹Refer to Appendix A of Exhibit E for the complete text of each of the Licensees' proposed measures.

²Capital cost includes new facilities or equipment or replacement of existing facilities or equipment with facilities or equipment that extend the life expectancy of the existing facilities or equipment.

³Annualized costs are calculated by summing Capital Cost and Total O&M Cost, and dividing the sum by 30.

Key:

O&M = operations and maintenance

U.S. = United States

- **Exhibit E; Section 6.2.1.2;** Page Number 6-5: Table 6.2-2 Licensees' Estimated Costs in 2019 Dollars Related to Implementation of Licensees' Proposed Conditions. The table has been updated to show the correct costs for the Recreation Management Plan and the total O&M cost for all proposed measures. The corrected Table 6.2-2 is below.

Table 6.2-2 Licensees' Estimated Costs in 2019 Dollars Related to Implementation of Licensees' Proposed Conditions.

Licensees' Proposed Condition		Total Capital Cost Over 30 Years^{1, 2} (2019 U.S. Dollars)	Total O&M Cost Over 30 Years (2019 U.S. Dollars)	Annualized Cost Over 30 Years,³ Excluding Energy (2019 U.S. Dollars)
Designation	Description			
Environment-Related Measures				
GS1	Implement an Erosion and Sediment Control Plan	\$0	\$0	\$0
WR1	Implement Pyramid Lake Water Surface Elevation Restrictions	\$0	\$450,000	\$15,000
WR2	Implement a Hazardous Materials Management Plan	\$0	\$150,000	\$5,000
AR1	Implement Flow Releases into Pyramid Reach	\$0	\$450,000	\$15,000

Table 6.2-2 Licensees' Estimated Costs in 2019 Dollars Related to Implementation of Licensees' Proposed Conditions (Continued).

Licensees' Proposed Condition		Total Capital Cost Over 30 Years ^{1, 2} (2019 U.S. Dollars)	Total O&M Cost Over 30 Years (2019 U.S. Dollars)	Annualized Cost Over 30 Years, ³ Excluding Energy (2019 U.S. Dollars)
Designation	Description			
AR2	Implement Pyramid Lake Fish Stocking Measure	\$0	\$8,806,000	\$294,000
TR1	Implement an Integrated Vegetation Management Plan	\$0	\$916,500	\$30,550
TR2	Implement the Sensitive Aquatic and Terrestrial Wildlife Management Plan	\$0	\$1,634,000	\$54,467
LU1	Implement a Fire Prevention and Response Plan	\$0	\$450,000	\$15,000
LU2	Implement a Project Safety Plan	\$0	\$60,000	\$2,000
VR1	Implement a Visual Resources Management Plan	\$0	\$157,000	\$5,233
CR1	Implement a Historic Properties Management Plan	\$0	\$3,503,000	\$117,000
RR1	Implement a Recreation Management Plan	\$0	\$41,540,000	\$1,384,667
Total		\$0	\$58,116,500	\$1,937,917

Notes:

¹Refer to Appendix A of Exhibit E for the complete text of each of the Licensees' proposed measures.

²Capital cost includes new facilities or equipment or replacement of existing facilities or equipment with facilities or equipment that extend the life expectancy of the existing facilities or equipment.

³Annualized costs are calculated by summing Capital Cost and Total O&M Cost, and dividing the sum by 30.

Key:

O&M = Operation and Maintenance

U.S. = United States

Proposed Project Boundary Acreages

The error identified regarding the proposed Project boundary acreages relates to the federal and State land totals as follows:

- The FLA states the total federal lands within the proposed Project boundary is 2,007 acres. The correct number is 1,934.5 acres.
- The FLA states the total National Forest System (NFS) lands within the proposed Project boundary is 2,000.5 acres. The correct number is 1,928.0 acres.
- The FLA states the total NFS lands within the proposed Project boundary managed as part of the Angeles National Forest (ANF) is 1,334.6 acres. The correct number is 1,262.1 acres.
- The FLA states the total California State Lands within the proposed Project boundary is 2,366.7 acres. The correct number is 2,439.2 acres.

The list below identifies those sections in the FLA for which an update is necessary due to the corrections to the proposed Project boundary acreages.

- **Transmittal Letter**; Opening paragraph: The total federal lands within the proposed Project boundary acreage should be 1,934.5 acres. The total NFS lands within the proposed Project boundary managed as part of the ANF should be 1,262.1 acres.
- **Exhibit A; Section 6.0**; Paragraph 2; Page Number 6-1: The acreage of federal lands stated should be 1,934.5 acres. Because of the acreage change, the total approximate area of federal land within the proposed Project boundary should be 42.3 percent.
- **Exhibit A; Section 6.0**; Page Number 6-2: Table 6.0-1 *Summary of Proposed Changes to Land Ownership Within the Existing FERC Project Boundary*: The acreage stated should be 1,928.0 acres for the proposed NFS Lands and 2,439.2 acres for the Non-Federal Lands, State of California. Because of the acreage change, in the third row "*Change to Boundary*", the total should be -862.02 acres for NFS Lands and -1,672.3 for Non-Federal Lands, State of California. The corrected Table 6.0-1 is below.

Table 6.0-1 Summary of Proposed Changes to Land Ownership Within the Existing FERC Project Boundary

Development	Federal Lands		Non-Federal Lands				Total
	NFS (acres)	BLM (acres)	State of California (acres)	Private (acres)	LADWP (acres)	County (acres)	Area (acres)
Existing	2,790.02	17.26	4,111.5	9.2	0.0	0.0	6,928.0
Proposed	1,928	6.5	2,439.2	15.5	171.8	2.8	4,563.8
Change to Boundary	-862.02	-10.76	-1,672.3	+6.3	+171.8	+2.8	-2,364.2

Source: DWR 2019

Key:

ANF = Angeles National Forest

BLM = U.S. Department of the Interior, Bureau of Land Management

LPNF = Los Padres National Forest

State of California = Lands owned by California Department of Water Resources, California Department of Parks and Recreation, and California Department of Transportation

- **Exhibit A; Section 6.0;** Page Number 6-3: Table 6.0-2 *Summary of Proposed Changes to Federal Lands Within the Proposed Project Boundary*. Because of the acreage change, the acres in the bottom row of the table under Township 06N, Range 17W, Section 25 should be 1.4 acres. The total federal lands in Table 6.0-2 should be 1,934.5 acres. The difference between existing and proposed Project boundary for NFS lands should be 862.02 acres. The total difference for federal lands between the existing and proposed Project boundary should be 872.78 acres.
- **Exhibit E; Section 1.2;** Page Number 1-2: The acreage stated should be 1,262.1 acres.
- **Exhibit E; Section 2.0;** Subsection 2.1.2; Paragraph 1; Page Number 2-4: The acreage stated should be 1,262.1 acres.
- **Exhibit E; Section 5.6;** Subsection 5.6.1 Existing Environment; Page Number 5-658: The acreage stated should be 1,928.0 acres for NFS lands.
- **Exhibit E; Section 5.6;** Subsection 5.6.1.6; Page Number 5-667: The acreage stated should be 1,928.0 acres. Because of the acreage change, the total approximate area of NFS lands within the proposed Project boundary should be 42.3 percent.

- **Exhibit E; Section 5.6;** Subsection 5.6.1.9; Page Number 5-675: Table 5.6-1 *Land Ownership Within the Proposed Project Boundary*. The acreage stated for the State of California should be 2,439.2 and for the NFS should be 1,928.0. Because of the acreage change, the percent of total acres should be 53.4 for the State of California and 42.3 for NFS. The corrected Table 5.6-1 is below.

Table 5.6-1 Land Ownership Within the Proposed Project Boundary

Ownership	Acres	Percent of Total
State of California	2,439.2	53.4
NFS	1,928.0	42.3
BLM	6.5	0.1
LADWP	171.8	3.8
Los Angeles County	2.8	0.1
Private	15.5	0.3
Total	4,563.8	100

Source: DWR 2019

Key:

BLM = U.S. Department of the Interior, Bureau of Land Management

LADWP = Los Angeles Department of Water and Power

NFS = National Forest System

- **Exhibit E; Section 5.6;** Subsection 5.6.2.1; Page Number 5-688: The acreage stated should be 1,934.5 acres. Because of the acreage change, the total approximate area of NFS land within the proposed Project boundary should be 42.3 percent.
- **Exhibit E; Section 5.7;** Subsection 5.7.1.2; Page Number 5-694: The acreage stated should be 1,262.1 acres.
- **Exhibit E; Section 5.8;** Subsection 5.8.1.1; Page Number 5-738: The acreage stated should be 1,934.5 acres of federal land and 1,262.1 of NFS lands managed by ANF. Because of the acreage change, the total approximate area of federal land within the proposed Project boundary should be 42.3 percent.
- **Exhibit E; Section 5.8;** Subsection 5.8.1.4; Page Number 5-787: The acreage stated should be 1,934.5 acres. Because of the acreage change, the total approximate area of federal land within the proposed Project boundary should be 42.3 percent.
- **Exhibit E; Section 5.9;** Subsection 5.9.1; Page Number 5-811: The acreage stated should be 1,934.5 acres

- **Exhibit E; Appendix A; Attachment 1 (Erosion and Sediment Control Plan); Section 1.1;** Subsection 1.1.1; Page Number 1-2: The acreage stated should be 1,934.5 acres of federal land and 1,262.1 of NFS lands managed by ANF.
- **Exhibit E; Appendix A; Attachment 1 (Hazardous Material Management Plan); Section 1.1;** Subsection 1.1.1; Page Number 1-2: The acreage stated should be 1,934.5 acres of federal land and 1,262.1 of NFS lands managed by ANF.
- **Exhibit E; Appendix A; Attachment 5 (Sensitive Aquatic and Terrestrial Wildlife Management Plan); Section 1.1;** Subsection 1.1.1; Page Number 1-2: The acreage stated should be 1,934.5 acres of federal land and 1,262.1 of NFS lands managed by ANF.
- **Exhibit E; Appendix A; Attachment 6 (Recreation Management Plan); Section 1.1;** Subsection 1.1.1; Page Number 1-2: The acreage stated should be 1,934.5 acres of federal land and 1,262.1 of NFS lands managed by ANF.
- **Exhibit E; Appendix A; Attachment 7 (Fire Prevention and Response Plan); Section 1.1;** Subsection 1.1.1; Page Number 1-2: The acreage stated should be 1,934.5 acres of federal land and 1,262.1 of NFS lands managed by ANF.
- **Exhibit E; Appendix A; Attachment 8 (Visual Resources Management Plan); Section 1.1;** Subsection 1.1.1; Page Number 1-2: The acreage stated should be 1,934.5 acres of federal land and 1,262.1 of NFS lands managed by ANF.
- **Exhibit E; Appendix A; Attachment 9 (Draft Historic Properties Management Plan); Section 1.2;** Page Numbers 1-4 and 1-5: The acreage stated should be 1,934.5 acres of federal lands, 1,928.0 acres of NFS lands, 1,262.1 of which is managed by the ANF.

Ms. Kimberly D. Bose, Secretary
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The Licensees request that FERC amend the FLA as indicated in this letter.

If you or your staff have any questions regarding these changes, please contact Jeremiah McNeil, DWR's Relicensing Program Manager at (916) 557-4555 or Anton Sy, LADWP's Relicensing Project Manager at (213) 367-2332.

Sincerely,

Gwen Knittweis

Gwen Knittweis, Chief
Hydropower License Planning
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Executive Division
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Simon Zewdu

Simon Zewdu, Director
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Enclosures

cc w/out Attachment: (See attached distribution list.)

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