

California Native Plant Society

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SMUD

Dave Hanson Mail Stop B355

PO Box 15830

Sacramento, CA 95852-1830

Re: Comments on the Upper American River Project (UARP) Relicensing Draft Supplement Analysis

Dear Mr. Hanson:

These comments are submitted on behalf of the El Dorado Chapter of the California Native Plant Society. We have a long history of concern for the protection of valuable and rare plant resources in El Dorado County. Of particular concern related to the UARP Relicensing is the conservation of the Pine Hill plants.

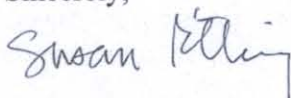
A suite of eight rare plant species have been the subject of conservation efforts in the county for over 20 years. Five of these species are federally listed as threatened or endangered, several of the species are listed as rare, threatened, or endangered under state law, and others are considered rare under the California Environmental Quality Act. The delivery of consumptive water has long been acknowledged as resulting in significant indirect and cumulative impacts on these rare plants and their habitat. See for example, the Final Environmental Impact Report for the El Dorado County General Plan (2004).

As we understand the project description, it includes a diversion point and storage capacity for consumptive water for use by El Dorado County. Inclusion of this feature and the commitment to deliver consumptive water in the future requires the disclosure of growth inducing effects on the Pine Hill plants from the use of such water. The supplemental analysis suggests that such effects would be speculative. They in fact are not. El Dorado County completed a general plan in 2004 and El Dorado Irrigation district and the El Dorado county Water Agency have under taken water planning and analysis that projects the effects of additional consumptive water use on some resources.

We also note that unless consultation for growth inducing impacts occurs now, FERC must retain jurisdiction over future use of consumptive water from Iowa Hill, any other diversion point associated with the UARP, or storage capacity for consumptive water. Further, consultation with FWS is required prior to FERC allowing consumptive water diversion at Iowa Hill, any other diversion point associated with the UARP, or storage capacity for consumptive water.

Thank you for considering our comments.

Sincerely,



Susan Britting