

Weber Hydroelectric Project
FERC No. 1744
Working Draft
Pre-Application Document
April/May 2015

Comments were received (as of 5/19/15) from Utah Division of Wildlife Resources (UDWR), American Whitewater (AW), U.S. Forest Service (USFS), Bureau of Reclamation (BOR), Utah Division of Water Quality (DWQ), and Trout Unlimited (TU). Formal comments were not received from Weber River Water Users Association (WRWUA); comments in green in this table represent their preliminary comments from the 4/28 interest group meeting.

Committer (initials/agency)	Section #/Title	Comment	Resolution
BJ/UDWR	2.4.7 Description of New Facilities	Please indicate that this discussion refers only to new power generation facilities. We initially understood that this would be the point in the document where the fish passage channel should be introduced, as it was unclear what subset of “new facilities” this section was introducing	Complete— added text to section 2.4.7.
BJ/UDWR	3.3.2 Fish Community	Include these additional species in the project area: native - Utah sucker (<i>Catostomus ardens</i>), speckled dace (<i>Rhinichthys osculus</i>), longnose dace (<i>Rhinichthys cataractae</i>), and redbelt shiner (<i>Richardsonius balteatus</i>); non-native - common carp (<i>Cyprinus carpio</i>)	Complete— added sections 3.3.2.6-9 and 3.3.2.12.
BJ/UDWR	3.3.2 Fish Community	Discussion on game species biomass - please make the correction that cutthroat trout, mountain whitefish, and brown trout make up more than 95% of the total biomass of game species	Complete— information corrected in section 3.3.2.
BJ/UDWR	3.3.2 Fish Community	We consider the Weber as a Class IIIB, which equates to a quality fishery with species of special concern (Bonneville cutthroat trout and bluehead sucker)	Complete— information added to section 3.3.2.
BJ/UDWR	3.3.2 Fish Community	Remove the reference to Oakley in the discussion on sterile rainbow trout. There are some catchable sterile rainbow trout stocked in Echo, East Canyon, and Lost Creek reservoirs, and it is possible that some of these fish can make it downstream to the Project Area.	Complete— information corrected in section 3.3.2.
BJ/UDWR	3.3.2.1 Bonneville Cutthroat Trout	Bonneville cutthroat trout have been petitioned for federal listing under the Endangered Species Act in both 1992 and 1998. In both cases, the United States Fish & Wildlife Service found the species not warranted for federal protection.	Complete— information added to section 3.3.2.1.
BJ/UDWR	3.3.2.1 Bonneville Cutthroat Trout	Bonneville cutthroat trout have a State of Utah (1997) and a Range-wide (2000) Conservation Agreement and Strategy developed to further cooperation toward protection of this species.	Complete— information clarified in section 3.3.2.1.
BJ/UDWR	3.3.2.1 Bonneville Cutthroat Trout	last sentence - Twenty-eight BCT have been able to navigate upstream past the Pacificorp Dam, possibly through the low-flow sluice gate, but there is no evidence available to indicate how these fish moved upstream past the dam.	Complete— information added to section 3.3.2.1.

*Weber Hydroelectric Project
FERC No. 1744
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BJ/UDWR	3.3.2.2 Bluehead Sucker	Bluehead sucker have a Range-wide (2004) and State of Utah (2006) Conservation Agreement & Strategy developed to further cooperation toward the protection of this species.	Complete— information added to section 3.3.2.2
BJ/UDWR	3.3.2.2 Bluehead Sucker	Change last sentence to read - Bluehead sucker populations occur in the Weber River from the confluence of the Ogden River upstream to above Echo Reservoir and the populations in the lower river (the Project Area and downstream) appear to be the most robust (Webber, et al. 2012).	Complete—changed information in 3.3.2.2.
BJ/UDWR	3.3.2.8 NA	Include a brief description of the other species described above and located in the project area.	Complete—added sections 3.3.2.6-9 and 3.3.2.12.
BJ/UDWR	3.7 Recreation	Add the following - Extensive angling use occurs in the bypass reach downstream of the recreational area. The UDWR completed a creel survey in the Weber River from the mouth of Weber Canyon upstream to the confluence with Lost Creek. An estimated 66,606 angler trips were made during 2013 to this reach of the Weber River (Nadolski and Penne 2013 in draft). While the creel survey did not quantify the number of anglers specifically using the bypass reach, it would be safe to assume that many of the estimated 19,454 trips made to the recreation area in 2014 were made by anglers.	Complete— information added to section 3.7.

*Weber Hydroelectric Project
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BJ/UDWR	3.10 Socioeconomics	<p>Krannich et al. (2012) estimated that anglers, on average, made \$84 in direct expenditures (e.g., gas, food, and lodging) per trip. Assuming only 50% of the above-referenced trips to the bypass reach were made by anglers, which we think is conservative, it would still mean that an estimated \$846,249 in annual direct expenditures were made by anglers frequenting local businesses during their fishing trips. Additionally, for every dollar in direct expenditures made, \$0.76 in indirect economic output (e.g., industry, labor income, and tax revenue) is created (Kim and Jakus 2012). The overall annual economic contribution of bypass reach angling to the Utah economy is, therefore, conservatively estimated at \$1,489,398.</p> <p><i>Krannich, R., R. Lilieholm, and J Unger, 2012. 2011 - 2012 Utah Angler Survey, Report to Utah Division of Wildlife Resources, Salt Lake City, Utah.</i></p> <p><i>Kim, M. K., and P. Jakus, 2012. The Economic Contribution and Benefits of Utah's Blue Ribbon Fisheries, Report to Utah Division of Wildlife Resources Blue Ribbon Fisheries Advisory Council, Salt Lake City, Utah</i></p>	Complete— information added to section 3.10.
BJ/UDWR	4.1.3 Fisheries and Aquatic Resources	<p>Include reference to the need for and value of downstream passage, along with upstream passage, in the first sentence. Screening costs may be high, but other strategies exist to promote downstream passage. This is not the documentation stage in which to dismiss an alternative; fuller documentation of the analysis of options and their effects is warranted, before we decide to move away from an option.</p>	Complete— information clarified in section 4.1.3.
BJ/UDWR	4.2.2.1 Hydrology	<p>While the precise effects of climate change cannot be predicted, periods of low water availability will likely become more frequent, so this information should be incorporated into analyses of fish passage channel functionality and likelihood of entraining larval or juvenile fish. For example, the fish passage channel will need to provide passage when the gates are open and closed on the dam (incorporate into section 4.2.3) and entrainment rates might change with changing velocities at inflows.</p>	This is information we will need to discuss for inclusion in the Aquatics Study Plan, to be completed by the end of 2015.

*Weber Hydroelectric Project
FERC No. 1744
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April/May 2015*

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BJ/UDWR	4.2.3 Fisheries and Aquatic Resources	The UDWR and TU have completed adequate movement studies on adult Bonneville cutthroat trout and bluehead sucker, so further movement studies are not needed for this life stage. One question with regard to movement that has not been addressed is if the Bonneville cutthroat trout population below the Pacificorp Dam is maintained from downstream drifting juvenile fish or from reproduction in the mainstem Weber River below the Pacificorp Dam. While some adult BCT have been documented to move downstream over the Pacificorp Dam, the size of the BCT population below the dam cannot be explained solely from the downstream movement of adults. Since the information exists to justify upstream fish passage at the Pacificorp Dam, downstream movement or entrainment may be a more important question. It would be helpful if a study were completed to help answer some of the following questions: 1) how much entrainment or loss of fish occurs in the turbines?; 2) what size classes or life stages may or may not be affected?; 3) will this potential problem, if it exists, be exacerbated with the creation of an upstream fish passage channel or with changes in instream flows?; 4) what might be potential solutions, if entrainment issues are discovered?; and, 5) what might be the costs associated with various potential solutions? Implicit in the last question is an acknowledgement that certain costs would not be considered reasonable to the group, and hence may not be advanced. Let us explore options before we discount any of the otherwise valid options, however.	A discussion and proposal will be included in the Aquatics Study Plan, to be completed by the end of 2015.
BJ/UDWR	4.2.3 Fisheries and Aquatic Resources	Look at incorporation of transponder detection arrays in upstream fish passage areas to assess long-term movement and use of passage structure.	This is an implementation issue that will be addressed later in the process.
BJ/UDWR	4.2.7 Recreation	Because the bypass reach is an important angling access area on the Weber River, which has limited public access, an improved trail (specifically under the interstate bridge) would facilitate recreational access downstream.	A discussion and proposal will be included in the Recreation Study Plan, to be completed by the end of 2015.
BJ/UDWR	4.2.7 Recreation	When fish passage facilities are built, investigate opportunities for creating an interpretive site/viewing area for anglers and non-anglers, alike	To be addressed during discussion of the license proposal.

*Weber Hydroelectric Project
FERC No. 1744
Working Draft
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April/May 2015*

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CV/AW	2.4.1 Current Operation	This section should include or reference other locations in the PDA that contain operational conditions for the bypassed river reach including any minimum instream flows or lack thereof in the bypassed river reach, as well as the typical and maximum diversion capacity.	Complete—minimum instream flow data was already included; diversion capacity was added to section 2.4.1.
CV/AW	3.7 Recreation	Whitewater recreation is largely dismissed in the PAD, and inappropriately so. The Weber River offers some of the closest paddling to Salt Lake City with a relatively long season. The dismissal is apparently based on a presumption of inadequate access to the river. Paddlers routinely and legally put in at the PacifiCorp picnic/rest area, immediately downstream of the project dam. They enjoy a two-mile Class III-IV whitewater run. Then they either 1) take out and walk back to their cars on the old (unused) highway, or 2) portage the diversion below the powerhouse and continue downstream to a fisherman's access at an old bridge. Access is definitely a limiting factor in the recreational use of this reach that we hope to improve.	Complete—new/clarified information included in 3.7.
CV/AW	4.1.7 Recreation	We agree that recreational river access is a significant issue.	No action required.
CV/AW	4.1.7 Recreation	The PAD fails to state that both the significant project diversion may – and likely does – have deleterious and significant recreational impacts in the bypassed river reach. We view withdrawing significant flows from a river as a significant recreation issue. While information seems to be limited on the project operation impacts on the bypassed reach hydrology, it does appear that project operations may significantly shorten the paddling season.	Complete— information clarified in section 4.1.7.
CV/AW	4.1.7 Recreation	We request that one portion of the proposed recreation facility use, needs and opportunities section specifically address whitewater paddling recreation extending from the project dam downstream to the potential takeout at the Weber Canal Co diversion structure or any other possible safe and suitable locations that may be discovered as the process goes forward.	Complete—information added to section 4.1.7.

*Weber Hydroelectric Project
FERC No. 1744
Working Draft
Pre-Application Document
April/May 2015*

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CV/AW	4.2.7 Recreation	<p>We typically request a whitewater flow study on the bypassed river reach such as the Weber River that follows the standard methodology as described in Whittaker et al. (Whittaker, Doug, Shelby, Bo, and Gangemi, John. Flows and Recreation: A guide to studies for river professionals. 2005. This document can be downloaded at the following National Park Service website: http://www.nps.gov/ncrc/programs/hydro/flowrec.pdf.) Note that this is a stepwise process that may not require a full controlled flow study if sufficient information can be gathered through desktop and/or surveys of experienced Weber River paddlers. AW has a history of working with the licensee to do flow studies that are appropriate for the particular needs of the project,</p> <p>The goal of a recreation flow study would be to assess the presence, quality, access needs, flow information needs, and preferred flow ranges for river-based boating resources in a step-wise manner. The information to be obtained can be generally characterized as quantitative and qualitative descriptions of:</p> <ul style="list-style-type: none"> • The range of optimal and acceptable flows for whitewater paddling; • The frequency, timing, duration, and predictability of optimal and acceptable paddling flows under current, run-of-river (in the bypassed reach, which should be equal to Project inflows), and any proposed alternative operations; • The access needs of whitewater boating use and the current and potential river access options for whitewater paddling; • The flow information needs of whitewater boating and the current and potential flow information distribution system; • The location, challenge, and other recreational attributes associated with specific rapids and other river features. <p>Thus, the information to be obtained for the whitewater paddling study is a combination of user-generated flow preferences and other data, information on current and proposed operations (e.g., discharges), geographic information and basic recreational information.</p>	Complete—information clarified/added to section 4.2.7.

*Weber Hydroelectric Project
FERC No. 1744
Working Draft
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April/May 2015*

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DA/USFS	3.2.1 Hydrology Table 3.2-2	Double-check 6.7 for average pH in December—outlier to rest of table	Complete—the dataset used for the WQ analysis has been revised such that the outlying average is no longer included. It was originally associated with an upstream monitoring station several miles above the project area that is no longer a part of the analysis.
DA/USFS	3.3 Fisheries and Aquatic Resources	BCT is a forest service sensitive species—FS sensitive species were listed in botany section, so it would be consistent to list them in aquatic and wildlife sections as well.	Complete—information added to section 3.3.3.
DA/USFS	3.5.3 Rare, Threatened, and Endangered Terrestrial Wildlife Species	FS sensitive species were listed in botany section, so it would be consistent to list them in aquatic and wildlife sections as well	Complete—only two species from the tables of terrestrial wildlife species with potential to occur in the PEA are also listed on the USFS R4 sensitive species list, the greater sage-grouse and yellow-billed cuckoo. These are now identified as USFS R4 sensitive species in section 3.5.3.
DA/USFS	4.2.2.1 Hydrology	How was instream flow determined under current license?	As discussed in the April 2015 interested party meeting, the current minimum flow has been in use since the 1950s; no records have been located that discuss the origin of the flow volume, but we suspect it was done in consultation with the USFS and UDWR.
CR/USFS	3.9 Aesthetic Resources	When are you going to replace the windows back to the old historic ones?	Unlikely—they were replaced after a fire in the 1980s; no change to document.

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JJR/BOR	3.10 Socioeconomics	<p>This section should include the benefits of the Weber power plant to Reclamation Projects that stored water through various water right interference agreements. Propose adding the following language to this section:</p> <p>“Through water right interference agreements, the winter water that would flow through the Weber Power Plant is stored in Echo Reservoir and is diverted across the Weber-Provo Canal to be stored in Deer Creek Reservoir. To date approximately \$290 million* has been spent on Echo and Deer Creek Reservoirs and their related facilities. Over the last 3 years between 30,000 to 40,000** acre-feet per year of Weber Power Plant water has been stored in Echo and Deer Creek Reservoirs and used primarily for irrigation and municipal use. The storage of 30,000 to 40,000 acres-feet of water is sufficient to meet the indoor water needs of 80,000 homes or 10,000 acres of irrigation.”</p> <p>* Reclamation Project costs were taken from the “Statement of Project Construction Costs and Repayment and recent Safety of Dams work. Costs include original construction costs, Safety of Dams work, Hydropower, canals and water distribution systems.</p> <p>** Quantity of Weber Power Plant water stored in Echo and Deer Creek Reservoir was taken from the Division of Water Rights Website – “Accounting for Deliveries to the Weber-Provo Canal” page.</p>	Complete—information added to section 3.10.at
KL/DWQ	General	Assuming that the audience is the public and not just FERC, an acronym list would be helpful.	Complete—Added to front of the document.

*Weber Hydroelectric Project
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Working Draft
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April/May 2015*

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KL/DWQ	2.4.3 Daily and Seasonal Ramping Rates	<p>Questions – what is done with the spoils when the forebay is dredged? This section also states that the license does not specify ramping rates, flushing flows, etc... Would there be any need or opportunity to consider operational changes to more closely mimic flow conditions or to prevent extreme changes in turbidity? Is there a routine annual maintenance cycle?</p>	<p>A sentence was added to section 2.4.3 explaining that spoils are hauled and disposed of offsite.</p> <p>There are no flushing flows or storage of water at the facility that alter flow conditions— discharge at the upstream USGS gage is the same as what passes through the facility, except for discharges/ withdrawals from the Weber Basin Water Conservancy District facility located immediately downstream of the USGS gage.</p> <p>Existing operational constraints are in place for raising/lowering the forebay and dewatering the pond. It has been PacifiCorp's experience that extreme changes in turbidity result from upstream activities.</p> <p>There is an annual maintenance cycle for the operation, however, it is related to diversions/water rights.</p>
KL/DWQ	Figure 3.1-1 Area geology	PEA is in the key but is not explained in corresponding text. I would suggest either spelling it out or making a brief statement about it in section 3.0 instead of waiting until section 3.4. (or both)	PEA is defined in section 2.2 of the PAD.
KL/DWQ	3.2.1 Hydrology	Please include a map of the USGS gage locations.	A map has been added to section 3.2.2 showing the location of the USGS gage.

*Weber Hydroelectric Project
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April/May 2015*

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KL/DWQ	3.2.3 Water Quality	It would be useful to indicate which beneficial uses apply specifically to the project area (2B, 3A, and 4).	Beneficial uses that apply to the assessment unit where the water quality analysis was conducted were added to the text in section 3.2.3.
KL/DWQ	3.2.3/Water Quality	The note on the draft assessment is incorrect: on the 2014 assessment Weber 3 and 6 are listed as not supporting their beneficial uses and are still on the 303(d) list. It appears the Weber River 4 was left off, but since it was listed previously and is not on the de-listing table it is still considered to be on the 303(d) list.	This comment has been addressed in the text of the section 3.2.3 to indicate that Weber-3 AU is listed as not supporting. Weber-6 was removed from the water quality analysis and is not addressed in the PAD.
KL/DWQ	3.2.3.1 Data Summary....	Which STORET/MLIDs were used? Please list. Please include a map of these locations (could be combined with a map of USGS gages).	A map of the STORET stations was added to section 3.2.3. Stations used in the analysis were Station ID 4921000 and Station ID 4922990 and are listed in the text along with a description of where the stations are located with regard to the project area.
KL/DWQ	3.2.3.1 Data Summary....	I recommend treating above and below sites separately for statistical purposes. Further, it does not seem appropriate to average data for 11 sites unless they are all within the same assessment unit (were all 11 sites from Weber River-4?) as defined by DWQ (assessment units are developed specifically to represent areas with similar water quality conditions). I would be happy to discuss this.	The water quality analysis was revised using two STORET stations (see IDs above), both of which are located in the Weber-3 Assessment Unit. The analysis combined data from both sites and also examined sites separately. Details of the revised analysis are included in the text of section 3.2.3. All figures and tables have been revised to reflect the new dataset.

*Weber Hydroelectric Project
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Working Draft
Pre-Application Document
April/May 2015*

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KL/DWQ	3.2.3.1 Data Summary....	<p>Figure 3.2.2 depicts an average maximum value for 'reference purposes', but since temperature is an instantaneous maximum (not to exceed) this doesn't have a lot of meaning. I recommend leaving that line off.</p> <p>I would suggest stating what percentage of measurements exceeded the standard in a given year and the number of samples. For assessment purposes you can exceed the temperature standard 10% or less of the time and not have the water body listed as impaired. (In short, this graph implies that there may be a problem, when there really isn't based on our data and assessment). I would also be happy to discuss this.</p>	<p>The average maximum line was included on the graph to provide additional information on how temperature may or may not be affecting fisheries. Text has been added to the document to explain the intent behind presenting average maximum temperature.</p> <p>Text was added to section 3.2.3 to clarify the water quality standard for temperature and explain that a single exceedance of 20C does not necessarily indicate an impairment.</p>
KL/DWQ	3.2.3.1 Data Summary....	Figure 3.2-3. You may wish to compare to the other D.O. standards as well, particularly the 6.5 mg/L 30-day average.	Text was added to section 3.2.3 acknowledging other DO water quality standards and explaining why these standards were not applied given our dataset.
KL/DWQ	3.2.3.1 Data Summary....	Table 3.2-2. The means in the final column are not consistent with the rest of the data in the table. For example: the DO minimum "mean" is listed as 6.0, when the mean of the data is actually 8.7 mg/L. The 6.0 mg/L actually matches the minimum value on the table. Please check this. This is also the case in table 3.2-3. Perhaps this column should have a different name?	This table has been revised to reflect the new dataset.
KL/DWQ	3.2.3.2 Water Quality upstream and...	Please include a map.	A map (Fig. 3.2-2) has been included in section 3.2.3.1 showing the location of the STORET stations.

*Weber Hydroelectric Project
FERC No. 1744
Working Draft
Pre-Application Document
April/May 2015*

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KL/DWQ	3.2.3.2 Water Quality upstream and...	Table 3.2-5. The percent difference from upstream to downstream should be positive if there is an increase from up to down. The table has that reverse. Also, I am not sure how the percentage difference was calculated – I get different numbers.	This table was revised to reflect percentage change in values from the upstream (u) to downstream (d) location. The following formula was used to calculate percentage change from upstream to downstream: $((d2-u1)/u1)*100$.
KL/DWQ	3.2.3.2 Water Quality upstream and...	General comment: it will be valuable to collect data in closer proximity to the project site going forward – there are a lot of other inputs/withdrawals to the stream in that 12 mile reach.	We agree. Our proposed sampling sites (see Map in section 4.2.2.3) target areas in closer proximity to the project area.

*Weber Hydroelectric Project
FERC No. 1744
Working Draft
Pre-Application Document
April/May 2015*

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KL/DWQ	4.2.2.3 Water Quality	<p>Table 4.2.1 Several DO standards are applicable. The 9.5 mg/L 7-day average and 8.0 mg/L minimum apply to early life stages only (usually spring). During the rest of the year the 7-day average is 5.0 mg/L and the minimum is 4.0 mg/L. The 30-day average is 6.5 mg/L.</p> <p>I recommend measuring total suspended solids (TSS) in addition to turbidity. There isn't a water quality standard for it, but it is a good measure of the amount of material in the stream. The turbidity measurement will not allow you to quantify how much material is in the stream, nor will a once/month sample indicate whether WQS are being met (since they are based on change in turbidity). Turbidity should also be monitored if there is any type of planned maintenance that might cause an increase.</p> <p>I recommend measuring flow (unless there are USGS gages very close by). If there is a good place to install them, pressure transducers can give you both flow and temperature.</p>	<p>DO standards were added to Table 4.2-1.</p> <p>TSS has also been added as a proposed parameter to monitor in the Aquatics Study Plan and is now included in Table 4.2-1.</p> <p>The Aquatics Study Plan (available Dec. 2015) will describe in detail the proposed parameters to be monitored and the frequency of monitoring. Some parameters may be monitored on an as needed basis depending on project operations (e.g. turbidity).</p> <p>The USGS gage (10136500) just upstream of the project area is sufficient to capture flow. Text was added to section 4.2.2.1. indicating this.</p>
KL/DWQ	4.2.2.3 Water Quality	<p>Please include a map of proposed sampling locations. Will the water from the powerhouse discharge be measured?</p>	<p>A map (Fig. 4.2-1) has been added to section 4.2.2.3 showing the proposed sampling sites. Yes, water from the powerhouse discharge is measured and text was added to section 4.2.2.1 indicating this.</p>

*Weber Hydroelectric Project
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April/May 2015*

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PB/TU	4.2.7 Recreation	In consideration of fish passage facilities, it might be worth it to investigate the opportunity to include an interpretative site with possible viewing area. Being able to observe fish species of all kinds helps to facilitate recreation and improve stakeholder buy-in, both in the concept of renewable energy and also in the concept of broadening the understanding of the general public to the needs of the fish in the Weber River.	To be addressed during discussion of the license proposal.
PB/TU	3.7 Recreation	2 nd paragraph: "There is extensive recreational use in the bypass reach downstream of the recreational area."	Complete—Added information to section 3.7.
PB/TU	4.2.7 Recreation	Many anglers seem to think that the best available habitat for fishing seems to be immediately downstream of the diversion structure in the restricted area. Part of the challenge may be that Weber River downstream of the first interstate bridge is technically challenging to access. Improving foot/pedestrian access to the bypass reach downstream of the restricted access area may help to focus recreational users downstream into safer areas. The primary impediment seems to be the riprap arrangement under the I-84 bridge. Modest modification of the angler access trail, without modifying the existing riprap, may encourage more distributed use by the public.	A discussion and proposal will be included in the Recreation Study Plan, to be completed by the end of 2015.

*Weber Hydroelectric Project
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PB/TU	4.1.3 Fisheries and Aquatic Resources	<p>First sentence scratched out “upstream” and commented: “upstream and downstream.”</p> <p>The primary point here is that we recognize that fish move bidirectionally through the river system. We know that they face challenges moving upstream of large instream structures like the Weber Dam, but questions remain about whether or not large numbers of fish are entrained into the hydro system and what their fate is. Based on research from the Smiths Fork of the Bear River, diversions that take a large proportion of the flow in the river have the potential to entrain a large proportion of fish living in the stream. Although entrainment is problematic for irrigation diversions where the water is consumed, we suspect the main challenge here to be fish injury from the turbines. This seems to be particularly true for the Francis turbines. Our primary questions related to downstream passage include:</p> <ul style="list-style-type: none"> • Determine if/how many and what species of fish become entrained in the hydro system • Do entrained fish experience a large mortality. • Is there a specific time period when fish seem to be migrating downstream at an increased risk of entrainment, 	<p>Complete—clarified text.</p> <p>A discussion and proposal will be included in the Aquatics Study Plan, to be completed by the end of 2015.</p>
IR/ WRWUA	3.3 Fisheries and Aquatic Resources	<p>“There are year round requirements for fish flows (minimum water volumes) on the east canyon stem of the Weber River (East Canyon Reservoir releases into East Canyon Creek) by Weber Basin Water Conservancy District. They are also required to do releases on the upper Weber, Smith, and Moore House. Consideration needs to be built for drought.”</p>	<p>Addressed during discussion at the interested party meeting held in late April of 2015; minimum instream flows are measured by reach and are not influenced by amounts on other reaches—for the Weber Project, they are measured and released at the Project diversion dam/intake area.</p>

*Weber Hydroelectric Project
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IR/WRWUA	3.2.1 Hydrology	<p>“The real world from here on will center on ‘drought cycles.’ Realizing that PacifiCorp will not be king any significant changes from the present ‘FERC’ permits. It would be important to address the PacifiCorp role to help during drought periods when there are low flows in the river. Chart 3.2-1 page 19 for the past 4 years it in nowhere close to what’s happening. It will become worse in the future.”</p>	<p>Addressed during April 2015 interested party meeting: PacifiCorp operations will not affect nor ameliorate drought cycles—the Weber Project is a run-of-river facility that affects the bypassed reach by removing up to 320cfs, when available, which is discharged back to the river immediately above the Weber-Davis Irrigation Company diversion dam structure. No changes made to document.</p>
IR/WRWUA	3.2.1 Hydrology Figure 3.2-1	<p>“Is consideration being given to improve facility operations? During thunder storms (rain events), upon lightning strikes; the gates on the stabilizing basin rise and send large volumes of water and debris.”</p>	<p>Discussed with PacifiCorp Operations and discovered that 24/7 notification has been made in these situations for over 10 years—no change to document or current procedures, per follow-up conversation with irrigation company.</p>
IR/WRWUA	3.2.2 Water Rights	<p>“For fish flow passage, PacifiCorp would need to take flow needs out of their ‘interference contract.’ There are copious prior water right holders ahead of PacifiCorp’s 1903 rights throughout the upper and lower (middle) river systems, 1856-1890 that have year round rights for minimum flow uses.”</p>	<p>Complete—as discussed, interference contracts are unrelated to the required minimum instream flows. Some clarification made to sections 3.2.2, 4.1.2.2, and 4.2.2.2 in regards to water rights to note that no changes are proposed to water rights.</p>
IR/WRWUA	3.2.2 Water Rights	<p>“PacifiCorp needs to make sure that the 365 CFS flows are maintained in order to maintain ‘beneficial use’ of water in a non-consumptive capacity, and follow the requirements for interference in the current contracts.”</p>	<p>Clarification to water rights information made.</p>