



Power Generation

245 Market Street
San Francisco, CA 94105

Mailing Address
Mail Code N11D
P.O. Box 770000
San Francisco, CA 94117

February 1, 2005

Filed via Electronic Submittal

Honorable Magalie Roman Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: DeSabra-Centerville Project No. 803-068
Pacific Gas and Electric Company's comments to the Federal Energy Regulatory
Commission's October 2004 Scoping Document 1

Dear Secretary Salas:

On October 20, 2004 the Federal Energy Regulatory Commission (FERC) issued Scoping Document 1 (SD1) to parties interested in the relicensing proceeding for Pacific Gas and Electric Company's (PG&E's or Licensee's) DeSabra-Centerville Hydroelectric Project, FERC No. 803 (Project). SD1 provides interested parties with FERC's preliminary list of issues and alternatives to be addressed in an Environmental Assessment analyzing conditions of a new Project license, and requests that comments on SD1 be provided to FERC no later than February 1, 2005. Additionally, 18 CFR § 5.9 provides for interested parties to file comments on a potential applicant's Pre-Application Document (PAD) and SD1, and to make information gathering and study requests within 60 days following FERC's notice of consultation procedures under 18 CFR § 5.8. FERC's notice of consultation procedures was issued on December 3, 2004.

This letter transmits PG&E's comments in response to FERC's October 20, 2004 request and pursuant to 18 CFR 18 CFR § 5.9. Additionally, this letter provides PG&E's evaluation of issues identified at FERC's November 17 and 18, 2004 Scoping meeting held in Chico, California. This evaluation compares issues identified at the Scoping meeting to those identified in the PAD and SD1. PG&E's comments are organized into four attachments as follows:

- Attachment 1: PG&E's Comments on FERC's October 2004 Scoping Document 1
- Attachment 2: PG&E's Comments on the Pre-Application Document
- Attachment 3: PG&E's Study Request Comments
- Attachment 4: PG&E's Comparison and Evaluation of Issues Identified in PG&E's PAD, in SD1, and at FERC's November 17 and 18, 2004 Scoping Meeting

Secretary
Federal Energy Regulatory Commission
February 1, 2005
Page 2

In summary, PG&E concludes: (1) SD1 did a good job of identifying issues to be addressed in the relicensing proceeding; (2) the PAD has proven to be a comprehensive and effective document for preparing interested parties for scoping and study plan development; (3) the suite of 41 potential studies proposed in the PAD in conjunction with other existing, relevant and reasonably available information appear substantially adequate to address identified issues; and (4) most of the 35 issues identified at the public Scoping meeting were already covered by the 86 issues identified in the PAD and the issues identified in SD1, and only 8 new issues were identified at the Scoping meeting, one of which may not arise from Project-induced impacts. Additionally, of the 86 issues identified in the PAD, 9 may not arise from Project-induced impacts. Issues that do not arise from Project-induced impacts may fall outside the scope of the relicensing proceeding.

PG&E's comments on the PAD, SD1, information gathering and study requests, and the issues identified at the Scoping meeting are intended to assist FERC in conducting an accurate and thorough analysis of site-specific and cumulative effects of relicensing the Project.

If you have any questions regarding this letter or the attachments, please contact me at (415) 973-5314.

Sincerely,



Todd Johnson
Sr. Project Manager – DeSabra-Centerville Relicensing Project

Cc: See attached FERC 803 Interested Parties Mailing List

Attachments

- Attachment 1: PG&E's Comments on FERC's October 2004 Scoping Document 1
- Attachment 2: PG&E's Comments on the Pre Application Document
- Attachment 3: PG&E's Study Request Comments
- Attachment 4: PG&E's Comparison and Evaluation of Issues Identified in PG&E's PAD, SD1, and at FERC's November 17 and 18, 2004 Scoping Meeting

Secretary
 Federal Energy Regulatory Commission
 February 1, 2005
 Page 3

Cc: FERC 803 Interested Parties Mailing List

Deborah Giglio
 U. S. Fish and Wildlife Service
 2800 Cottage Way, Rm W-2605
 Sacramento, CA 95825

Mike Aceituno
 NOAA Fisheries
 650 Capitol Mall, Suite 8-300
 Sacramento, CA 95814

Takeshi Yamashita, Director
 San Francisco Regional Office
 Federal Energy Regulatory Com.
 901 Market Street, Suite 350
 San Francisco, CA 94103-1778

Justin Ly
 U. S. Fish and Wildlife Service
 2800 Cottage Way, Rm W-2605
 Sacramento, CA 95825

Howard Brown
 NOAA Fisheries
 650 Capitol Mall, Suite 8-300
 Sacramento, CA 95814

Susan O'Brien
 Federal Energy Regulatory Com.
 888 First Street N. E.
 Washington, DC 20426

Kathy Brown
 U. S. Fish and Wildlife Service
 2800 Cottage Way, Rm W-2605
 Sacramento, CA 95825

Bob Hawkins
 U. S. Forest Service
 650 Capitol Mall, Room 7524
 Sacramento, CA 95814

Tim Welch
 Federal Energy Regulatory Com.
 888 First Street N. E.
 Washington, DC 20426

Campbell Ingram
 US Fish and Wildlife Service
 2800 Cottage Way, Rm. W-2605
 Sacramento, CA 95825

Dennis Smith
 U. S. Forest Service
 650 Capitol Mall, Room 7524
 Sacramento, CA 95814

Diana Shannon
 Mail Code PJ-12.3
 Federal Energy Regulatory Com.
 888 First Street N.E.
 Washington, DC 20426

Paul Ward
 CA Dept. of Fish and Game

 2545 Zanella Way, Suite F
 Chico, CA 95928

Julie Tupper
 U. S. Forest Service
 650 Capitol Mall, Room 7524
 Sacramento, CA 95814

J. Mark Robinson, Director
 Office of Energy Projects
 Federal Energy Regulatory Com.
 888 First Street N.E.
 Washington, DC 20426

Steve Bowes
 National Park Service
 1111 Jackson Street, Suite 700
 Oakland, CA 94607

Kathy Turner
 Hat Creek Ranger District
 P. O. Box 220
 Fall Fiver Mills, CA 96028

Environmental Protection
 Agency
 75 Hawthorne
 San Francisco, CA 94105

Mary Lisa Lynch
 CA Dept of Fish and Game
 1701 Nimbus Road, Suite A
 Rancho Cordova, CA 95670

Mike Taylor
 Feather River Ranger District
 875 Mitchell Ave.
 Oroville, CA 95965

Paul McIntosh
 Chief Administrative Officer
 Butte County
 25 County Center Drive
 Oroville, CA 95965-3380

Bill Kuntz
 Bureau of Land Management
 Redding Field Office
 255 Hemsted Drive
 Redding, CA 96002

Jane Goodwin
 Lassen National Forest
 P. O. Box 767
 Chester, CA 96020

Ed Craddock, Director
 Butte County Water Resource
 Conservation
 1 County Center Drive
 Oroville, CA 95965

Jim Canaday
 State Water Resources Control
 Board
 1001 I Street, 14th Floor
 Sacramento, CA 95814

Duane Marti
 Bureau of Land Management
 2800 Cottage way
 Sacramento, CA 95825

Jim Pedri
 Reg. Water Quality Control Bd.
 415 Knollcrest Drive
 Redding, CA 96002-0101

Secretary
 Federal Energy Regulatory Commission
 February 1, 2005
 Page 4

Matt Myers
 State Water Resources Control
 Board
 1001 I Street, 14th Floor
 Sacramento, CA 95814

Beth Lawson
 State Water Resources Control
 Board
 Division of Water Rights
 1001 I Street, 14th Floor
 Sacramento, CA 95814

Curtis Knight
 California Trout
 P. O. Box 650
 Mt. Shasta, CA 96067

Steve Edmondson
 777 Sonoma Avenue, Room 325
 Santa Rosa, CA 95404-6515

Eric Theiss
 650 Capitol Mall, Suite 8-300
 Sacramento, CA 95814-4706

Dan Hytrek
 501 West Ocean Boulevard,
 Suite 4470
 Long Beach, CA 90802-4221

Harvey Angle, Chairperson
 Enterprise Rancheria of the
 Maidu Indians
 1940 Feather River Blvd., Suite B
 Oroville, CA 96965

Lorie Jaimes, Chairperson
 Greenville Rancheria
 P. O. Box 279
 Greenville, CA 95974

Gary Archuleta
 Mooretown Rancheria of the
 Maidu Indians
 #1 Alverda Drive
 Chico, CA 95966

Maidu Advisory Council
 2128 Myers Street
 Oroville, CA 95966

Joe Marine
 1025 35th Avenue, Apt. 9
 Sacramento, CA 95822

Patsy Seek, Chairperson
 Konkow Valley Band of Maidu
 1185 Eighteen Street
 Oroville, CA 95965

Patty Reese-Allan
 Cultural Resources Rep.
 Berry Creek Rancheria of
 Maidu Indians
 #5 Tyme Way
 Oroville, CA 95966

Rebekah Funes
 Cultural Resources Rep.
 Mechoopda Indian Tribe
 of Chico Rancheria
 125 Mission Ranch Road
 Chico, CA 95928

Candice Miller,
 Tribal Administrator
 Mooretown Rancheria of Maidu
 Indians
 #1 Alverda Drive
 Oroville, CA 95966

Ren Reynolds
 Butte Tribal Council
 1693 Mount Ida Road
 Oroville, CA 95966

Maidu Cultural and
 Development Group
 P.O. Box 126
 Greenville, CA 95947

Clara LeCompte
 Maidu Nation
 P.O. Box 204
 Susanville, CA 96130

Mike Despain
 Environmental Office
 Greenville Rancheria
 P.O. Box 279
 Greenville, CA 95974

Steve Santos, Chairperson
 Mechoopda Indian Tribe of
 Chico Rancheria
 125 Mission Ranch Blvd
 Chico, CA 95926

Albert Martin, Chairperson
 Berry Creek Rancheria of the
 Maidu Indians
 5 Tyme Way
 Oroville, CA 95966

Arlene Ward
 Mechoopda Indian Tribe of Chico
 Rancheria
 125 Mission Ranch Road
 Chico, CA 95926

Advisory Council on Historic
 Preservation
 Office of Planning and Review
 12136 W. Bayaud Ave.,
 Suite 330
 Lakewood, CO 80228

Dr. Knox Mellon, SHPO
 CA Dept. of Parks and
 Recreation
 Office of Historic Preservation
 P. O. Box 942896
 Sacramento, CA 94296-0001

Robert J Baiocchi
 P. O. Box 1790
 Graeagle, CA 96103

Jerry Mensch
 CA Sportfishing Protection All.
 1673 Kendall
 Roseburg, OR 97470

Michael Smith
 Friends of Butte Creek
 1804 Arroyo Canyon
 Chico, CA 95928

Secretary
 Federal Energy Regulatory Commission
 February 1, 2005
 Page 5

Friends of Butte Creek
 Box 3305
 Chico, CA 95927

Lee Heringer
 3964 Chico River Road
 Chico, CA 95928

Dan Efseaff
 Chico Paddleheads
 580 Vallombrosa Ave
 Chico, CA 95926

Kelly Catlett
 Friends of the River
 915 20th Street
 Sacramento, CA 95814

Roger Cole
 P. O. Box 68
 Forest Ranch, CA 95942

Phil and Judy LaRocca
 5347 La Playa Court
 Chico, CA 95928

Bill Keir
 William M. Kier Associates
 207 Second ST. #B
 Sausalito, CA 94965

Andrew Harris
 1570 Rve Francais
 Chico, CA 95973

Laura Norlander
 CA Hydropower Reform
 Coalition
 2140 Shattuck Ave. Fifth Floor
 Berkeley, California, 94704

Joyce Simmons
 14911 Nimshew Road
 Magalia, CA 95954

Tom Richardson
 26 Vermillion Circle
 Chico, CA 95928

Allen Harthorn
 Friends of Butte Creek
 5342 La Playa Ct.
 Chico, CA 95928

Tim Sagraves
 14200 Deerwood
 Red Bluff, CA 96080

Gary Alt, District Manager
 California Water Service Co.
 1908 High Street
 Oroville, CA 95965

Heather Hacking
 Chico Enterprise – Record
 P. O. Box 9
 Chico, CA 95927

Ed Chombeau, President
 Butte Creek Watershed Con.
 P. O. Box 1611
 Chico, CA 95927

Lou DeMeyer
 9551 Cummings Road
 Durham, CA 95938

Chuck Kutz
 Butte Creek Watershed
 Conservancy
 751 Arbutus Ave.
 Chico, CA 95926

Gabriel Kopp
 915 Lakeside #6
 Red Bluff, CA 96080

Grant Jones
 Jones Resort
 13487 Achilles Court
 Magalia, CA 95945

Randy Bailey
 3050 Meadow Creek Road
 Lincoln, CA 95648

Carolyn Short
 Chico Paddleheads
 P. O. Box 180
 Durham, CA 95938

Vickie Newlin
 650 Capitol Mall, 5th Floor
 Sacramento, CA 95814

Cary Steen
 12702 Merritt Horning
 Chico, CA 95928

Russ Collar
 975 East Ave. #127
 Chico, CA 95926

John Merz
 Sacramento River Pres. Trust
 P. O. Box 5366
 Chico, CA 95927

Eric Ginney
 The Louis Berger Group
 1735 Normal Ave.
 Chico, CA 95928

Marty Dunlap
 Sacramento River Preservation
 Trust
 5 Jerome Place
 Chico, CA 95926

Elaine Ellsmore
 1653 Normal Ave.
 Chico, CA 95928

Walt Schafer
 5357 Nimshew Run
 Chico, CA 95928

Secretary
 Federal Energy Regulatory Commission
 February 1, 2005
 Page 6

Kit Kerby
 1271 Calla hane
 Chico, CA 95926

Dave Steindorf
 Chico Paddleheads
 1325 Deadora Way
 Paradise, CA 95969

Steven Thomas
 777 Sonoma Ave., Room 325
 Santa Rosa, CA 95404

Cal Ling and John Serlac
 5203 Coleman Rand Road
 Chico, CA 95928

Kevin Lewis
 Shasta Paddlers
 4641 Hornbeck Ln
 Anderson, CA 96007-2631

William Johnson
 Butte Creek Watershed
 Conservancy
 P. O. Box 1611
 Chico, CA 95927

Harllee Branch
 CA Dept. of Fish & Game
 1416 9th Street, 12th Floor
 Sacramento, CA 95814

Elisabeth Blaug
 Federal Energy Regulatory Com.
 888 First Street NE
 Washington, DC 20426

Emily Carter
 Federal Energy Regulatory Com.
 888 First Street NE
 Washington, DC 20426

Kathy Brown
 U.S. Fish And Wildlife Service
 2800 Cottage Way, Rm W-2605
 Sacramento, CA 95825

Kelly Bricker
 Devine Tarbell & Associates
 2720 Gateway Oaks Drive, #300
 Sacramento, CA 95833

Chester Conway
 Mechoopda Indian Tribe of
 Chico Rancheria California
 125 Mission Ranch Blvd.
 Chico, CA 95926

Danielle Cresswell
 Haling & Associates
 166 Eaton Rd. Suite B
 Chico, CA 95973

Michael Derg
 Lassen National Forest
 P.O. Box 767
 Chester, CA 96020

Thomas Garcia
 USDA Forest Service
 900 E. Hwy 36
 Chester, CA 96020

Terri Frolli
 USDA Forest Service
 P.O. Box 767
 Chester, CA 96020

Tracy McReynolds
 CA Dept. of Fish & Game
 2545 Zanella Way #F
 Chico, CA 95928

Roland McNutt
 Chico Paddleheads
 P.O. Box 4863
 Chico, CA 95927

Kevin McCormick
 Plumas National Forest
 875 Mitchell Ave
 Oroville, CA 95965

Gabriella Messina
 Environmental Advocates,
 CSUS
 25 Main Street
 Chico, CA 95927

Jill Miller
 Montgomery Watson Harza
 100 Howe Avenue, Suite 2105
 Sacramento, CA 95825

Stacey Mathews
 Regional Water Quality
 Control Board
 415 Knollcrest Drive
 Redding, CA 96002

Eric Ritter
 Bureau of Land Management
 355 Hemsted Drive
 Redding, CA 96002

Joe Molter
 Bureau of Land Management
 355 Hemsted Drive
 Redding, CA 96002

Jim Nelson
 Furlong Archaeological
 Consulting
 89 Wind Ridge Drive
 Yankee Hill, CA 95965-9233

Ken Roby
 Lassen National Forest
 P.O. Box 767
 Chester, CA 96020

Ann-Ariel Vecchio
 Federal Energy Regulatory Com.
 888 First Street NE
 Washington, DC 20426

Craig Odyard
 Lassen National Forest
 2550 Riverside Drive
 Susanville, CA 96130

Paul Persons
 1834 Arroyo Canyon
 Chico, CA 95928

Sharan Quigley
 Butte Creek Watershed
 Conservancy
 13459 Centerville Road
 Chico, CA 95928

Secretary
Federal Energy Regulatory Commission
February 1, 2005
Page 7

Ron Rogers
Bureau of Land Management
355 Hemsted Drive
Redding, CA 96002

John Rudderow
2137 Honey Run Road
Chico, CA 95928

Kurt Sable
Lassen National Forest
P.O. Box 767
Chester, CA 96020

Secretary
Federal Energy Regulatory Commission
February 1, 2005
Page 8

TSJohnson(3-5314):020105 Ltr (FERC) - FERC 803 SD1 Comments 020105.doc

bcc: Via Email (w/attachments)

Craig Bolger
Jim Bundy
David Moller
Alan Soneda
Bill Zemke
Janet Loduca
Gene Geary
Mike Fry
Ed Cheslak
John Mintz
Alison MacDougall
Scott Steinberg
Janet Walther
Lisa Randle

File: w/attachments FERC 803, 026.1124

Attachment 1
PG&E's Comments on FERC's October 2004 Scoping Document 1

Scoping Document 1, SD1 (Section Reference)	Licensee's Comments
<p>4.1 Applicant's Proposed Action</p> <p>PG&E proposes to continue operating the DeSabra-Centerville Project primarily as a run-of-river system and maintain the project with proposed measures to protect and enhance the environment. There are no plans for construction, redevelopment, or additional generation units.</p>	<p>For clarification, Licensee proposes no addition or changes to the Project facilities or operations at the current time. As described in Section 6.0 of the Licensee's October 2004 Pre-Application Document (PAD), Licensee proposes to conduct a number of studies to assess whether changes in Project facilities or operation are warranted. The results of these studies and further consultation with the resource agencies may lead to future changes to Project facilities or operation..</p>
<p>5.2.1 Water Quantity and Quality</p> <ul style="list-style-type: none"> • Adequacy of monitoring compliance of minimum streamflow releases. 	<p>Licensee believes this issue is incorrectly stated. Licensee's streamflow gages are adequately rated to assure compliance with minimum streamflow requirements. These rated gages, however, do not characterize flow during spill events when the flow exceeds the gage rating curves. Thus, not all of the flow within the natural channels of either Butte Creek or WBFR is directly measured. Licensee has proposed a separate analysis during relicensing to develop synthesized unimpaired and regulated hydrology of Project-affected reaches of Butte Creek and WBFR. Similarly, minimum flows below feeder diversions have been documented by flow measurements, but the full range of flows within the feeder streams is not measured. Licensee suggests that this issue statement be revised to read "Adequacy of existing gages to monitor hydrologic characteristics".</p>
<p>5.2.2 Aquatic Resources</p> <ul style="list-style-type: none"> • Potential for fish passage upstream in Butte Creek 	<p>Licensee believes that the number and size of natural barriers at and above Lower Centerville Diversion Dam (LCDD) makes the development of upstream fish passage infeasible. Johnson and Keir [1988] documented 77 barriers between LCDD and the Butte Creek Diversion Dam. A waterfall 35 feet high is present only 0.58 miles upstream of LCDD with seven other natural barriers between there and the LCDD. The LCDD itself is constructed on top of an 11.3 foot high natural barrier; Spring-run Chinook are only rarely able to pass an 11.1-foot high natural barrier located a mile downstream of the LCDD, so it is likely that the natural barrier at the site of the LCDD presented a significant impediment to migration before the dam was constructed. During the Butte Creek Science Workshop held by the Licensee in Chico on April 8, 2004, George Heise (CDFG's senior engineer) discussed the migration barriers in Butte Creek. He concluded that upper Butte Creek did</p>

DeSabra-Centerville Project No. 803-068

Scoping Document 1, SD1 (Section Reference)	Licensee's Comments
	not make a good candidate for fish passage improvement because of the number of migration barriers and the overall high gradient of the channel. Based on this information, Licensee does not believe additional information or mitigation is needed to address this issue.
<p>5.2.3 Terrestrial Resources</p> <ul style="list-style-type: none"> Effects of project operations on culturally important plants (for Native Americans); 	<p>For clarification, while potential effects of the Project upon culturally important plants was identified as a potential Botanical Resource issue in the Pre-Application Document, PG&E is currently not proposing plans to identify all culturally important plants within the Project Area. However, PG&E will be undertaking a study to identify areas of traditional cultural importance. Such areas could include locations that are currently being used to gather culturally important plant resources.</p>
<p>5.2.7 Cultural Resources</p> <ul style="list-style-type: none"> Effects of the continued project operation, including maintenance activities, on <i>historic properties</i> [italics added] and archeological resources within the area of potential effect (APE) and the potential for project structures to be eligible for inclusion in the National Register of Historic Places Effects of project operations on Indian tribal interests or traditional cultural properties within the APE; 	<p>For clarification, the term “historic properties” is inclusive, and includes all properties that are eligible for listing on the National Register of Historic Places. Such properties could include particular prehistoric and historic archaeological resources, Traditional Cultural Properties (TCPs), and features of the historic DeSabra-Centerville Hydroelectric Project system.</p> <p>Licensee suggests that both issue statements be combined into a single bullet as follows to capture inclusiveness of the term “historic properties”:</p> <ul style="list-style-type: none"> Effects of the continued Project operation, including maintenance activities, on historic properties (defined as all properties that are eligible for listing in the National Register of Historic Places) located within the Project Area of Potential Effects (APE).
<p>8.0 Consistency with Comprehensive Plans</p> <p>Section 10(a)(2) of the FPA requires us to consider whether or not, and under what conditions, relicensing the project would be consistent with relevant comprehensive plans on the Commission's Comprehensive Plan List. Those plans currently listed which we consider to be relevant to this project are listed below. Agencies are requested to review this list and to inform FERC of any changes (additions/subtractions). If there are plans that should be added to the list, agencies should file the plans according to 18 CFR 2.19.</p>	<p>Licensee believes that the comprehensive plans identified below supersede specific comprehensive plans listed in SD1.</p>

DeSabra-Centerville Project No. 803-068

Scoping Document 1, SD1 (Section Reference)	Licensee's Comments
California Department of Parks and Recreation. 1994. California outdoor recreation plan-1993. Sacramento, California. April 1994. 154 pp. and appendices.	Superseded by: California Department of Parks and Recreation. 2002. California outdoor recreation plan-2002. Sacramento, California. 154 pp. and appendices.
California - The Resources Agency. Department of Parks and Recreation. 1983. Recreation needs in California. Sacramento, California. March 1983. 39 pp. and appendices.	In addition, the 1983 Recreation Needs in California and the 1998 Public Opinions and Attitudes on Outdoor Recreation in California should be replaced with:
California Department of Parks and Recreation. 1998. Public opinions and attitudes on outdoor recreation in California. Sacramento, California. March 1998.	California Department of Parks and Recreation. 2003. Public Opinions and Attitudes on Outdoor Recreation in California 2002, An Element of the California Outdoor Recreation Planning Program. California Department of Parks and Recreation, California State Parks. Sacramento, CA

Attachment 2
PG&E's Comments on the Pre-Application Document

PG&E filed a Pre-Application Document (PAD) pursuant to 18 C.F.R. § 5.6 for the Project on October 4, 2004. The PAD is organized into three volumes.

- Volume 1 contains all of the information required by 18 CFR § 5.6 (c) and (d) and was distributed to Federal and state resource agencies, local governments, Indian tribes, and other members of the public likely to be interested in the relicensing proceeding.
- Volume 2 contains drawings of Project works (Exhibit F and L drawings) that PG&E has determined meet the definition of Critical Energy Infrastructure Information pursuant to the Commission's June 23, 2003 Order No. 630-A. Consistent with this order, PG&E did not distribute Volume 2 to the public, but did submit it to FERC.
- Volume 3 contains confidential cultural resources information that was provided under separate cover exclusively to FERC's archaeologist assigned to relicensing of the Project.

After submitting the PAD, it came to PG&E's attention that the PAD Questionnaire and May 26, 2004 PAD Questionnaire transmittal letter intended to be included in Appendix A of the PAD had been inadvertently omitted. PG&E's October 26, 2004 letter to FERC filed with FERC a copy of the PAD Questionnaire and May 26, 2004 transmittal letter.

Other than the unintentional omission of the PAD Questionnaire, PG&E believes that the PAD fully complied with the requirements set forth in 18 C.F.R. § 5.6 and provided Federal and state resource agencies, local governments, Indian tribes, and other members of the public likely to be interested in the relicensing proceeding with existing, relevant, reasonably available information regarding the Project. The sufficiency and completeness of the PAD was borne out during FERC's November 17 and 18, 2005 Scoping meeting, when participants came well prepared for the scoping process, and only a few new issues arising from Project-induced impacts not already included in the PAD were identified (See Attachment 4). PG&E does not intend to revise the PAD.

Attachment 3
PG&E's Study Request Comments

Section 6.3 of PG&E's Pre-Application Document (PAD) listed 41 potential studies and information gathering efforts that may be needed to address the preliminary issues identified in Section 6.2 of the PAD. In developing this list, PG&E considered the preliminary issues, and evaluated the adequacy of existing, relevant and reasonably available information to address these issues. Additionally, PG&E considered the seven criteria listed in 18 CFR § 5.9, which all relicensing participants will need to address in making any information gathering and study requests. PG&E incorporated these criteria in a study plan template, included in the PAD, to assist in developing formal study plans.

PG&E believes that the majority of information needed for evaluating the preliminary issues listed in Section 6.2 of the PAD already exists or is being obtained. Nonetheless, PG&E believes the potential studies and information listed in Section 6.3 may be needed to fully evaluate these issues and, if appropriate, to inform the development of protection, mitigation and enhancement measures for the Project. Once the necessary information is gathered, the issue can be evaluated, perhaps using the approach of comparing the existing condition to the desired condition, and potential protection, mitigation and enhancement measures to address the issue can be developed, if appropriate.

The potential study and information gathering needs listed in Section 6.3 came from multiple sources, including PG&E, consultations with resource agencies, Tribes and others, and responses to the PAD Questionnaire PG&E sent to interested parties during preparation of the PAD. Subsequent to filing its PAD, PG&E has obtained additional input on potential studies and information gathering from relicensing participants at FERC's November 17 and 18, 2004 Scoping meeting, during four days of applicant-sponsored study plan workshops on January 6, 7, 10, and 11, 2005 and through informal consultations. This additional information has been useful in further developing the potential studies proposed in the PAD. PG&E believes that the potential studies and information gathering needs identified in the PAD, as may be modified by input from other relicensing participants, continues to be appropriate and adequate for addressing Project-induced issues identified to date.

Attachment 4

PG&E's Comparison and Evaluation of Issues Identified in PG&E's PAD, in FERC's SD1, and at FERC's November 17 and 18, 2004 Scoping Meeting

Three major sources of identifying environmental issues related to PG&E's relicensing of its DeSabra-Centerville Hydroelectric Project exist.

In chronological order, the first source of identified environmental issues is PG&E's PAD, filed October 4, 2004. The PAD includes a "...preliminary list of issues that may arise from the Project impacts..." (PAD pp. 6.2-1 through 6.2-25). PG&E developed its list from "...multiple sources, including the Licensee, consultations with resource agencies, Tribes and others, and responses to the PAD Questionnaire..." In the PAD, PG&E noted it believed that "...not all of the issues identified by others result from Project-induced impacts. Such issues may be outside the scope of the relicensing proceeding..." (PAD pg. 6.2-1.)

The second source of identified environmental issues is FERC's SD1, dated October 2004, which contains a "...preliminary list of environmental issues to be addressed in the EA" to be prepared by FERC to satisfy the requirements of the National Environmental Policy Act (NEPA) (SD1, pp. 11 and 14). In addition, FERC preliminarily identified water quantity, water quality and fisheries as "...resources that have the potential to be cumulatively affected..." (SD1, pg. 10).

The third source of identified environmental issues is the transcript from FERC's November 17 and 18, 2004 public Scoping meeting (Official Stenographers Report 2004). In preparing this comparison and evaluation, PG&E has combined and edited the issues raised during the public Scoping meeting to be in a format similar to those listed in SD1 and the PAD for a total of 35 issues from the public Scoping meeting. Note that in this comparison and evaluation, PG&E has included only *issues*, and has not included any comments raised during the public Scoping meeting that related to potential protection, mitigation and enhancement measures, since these will be addressed later in the relicensing proceeding. In addition, PG&E has noted in this comparison and evaluation, but not included as *issues*, any comments raised during the public Scoping meeting regarding study plans (e.g. study area, methodology, schedule) since these are not environmental *issues*.

This comparison and evaluation attempts to combine all of the environmental issues identified in the PAD, SD1 and at the public Scoping meeting into a single list organized by resource area. PG&E intends that this comparison and evaluation will facilitate FERC's preparation of Scoping Document 2 (SD2) and assist all relicensing participants by providing the basis for a master list of issues. PG&E's evaluation found that all of the issues identified in SD1 were covered by issues identified in the PAD, and that of the 35 issues identified at the public Scoping meeting, only 8 were not covered by issues identified in the PAD. These 8 issues are identified in the table in underline type.

DeSabra-Centerville Project No. 803-068

In addition to evaluating whether the issues identified in SD1 and at the public Scoping meeting were covered by those identified in the PAD, PG&E also evaluated whether the issues from each of the PAD, SD1 and the public Scoping meeting arise from Project-induced impacts. Based on this evaluation PG&E concluded that 9 of the issues identified in the PAD may not arise from Project-induced impacts and one of the 8 additional issues identified at the public Scoping meeting may not arise from Project-induced impacts. These 10 issues that may not arise from Project-induced impacts are identified in the table by shading. These 10 issues may fall outside the scope of the relicensing proceeding.

The table below lists the environmental issues identified in the PAD, SD1, and at the public Scoping meeting. The table is organized to show the overlap of the issues from SD1 in the left column, to the PAD in the middle column, to the public Scoping meeting in the right column.

DeSabra-Centerville Project No. 803-068

200502015034 Received FERC OSEC 02/01/2005 03:30:00 PM Docket# P-803-068

WATER USE AND QUALITY		
<i>Issues Listed in SD1 (3)</i>	<i>Issues Listed in PAD (12)</i>	<i>Issues from Public Scoping Meeting (7)</i>
Effects of project operations on water temperature, contaminants, and other water quality parameters in the project reservoirs and project-affected stream reaches	Potential effects on water temperature and quality in Project reservoirs and Project-affected stream reaches	Effects of algaecide use in canals on water quality (SWRCB. pg 56 of Nov. 17 AM Transcript) [Also see SD1 and PAD issue regarding herbicide use in canals under Aquatic Resources] Effects of canal cleaning on water quality (BCW. Pg. 58 of Nov. 17 AM Transcript)
	Potential effects on water quality from sediment caused by overtopping or structural failure of canals or flumes, or from landslides and debris flows that intersect Project canals or flumes	Effects of landslides, canal failures and dam failures on water quality on National Forest Lands and deposition in streams (USFS. pg 58-59 and FBC. Pp. 61-65 of Nov. 17 AM Transcript)
	Potential for release of toxic substances into surface waters related to Project operation and maintenance, and Project-related recreation activities	-----
	Potential effects on water quality from sediment related to Project spillways	-----
	Potential effects on water quality of sediment caused by runoff from Project Roads and other Project-related hard surface runoff	-----
	Consistency with Water Quality Standards in Project-affected stream reaches	-----
	Adequacy of monitoring compliance of minimum streamflow releases	Adequacy of streamflow gages to accurately measure required streamflows in Project-affected stream reaches
Effects from the discontinued use of project feeder diversions	Discontinued use of four of eleven feeder diversions	-----
-----	Effects of creation of Project reservoirs on quantity of stream habitat	-----
-----	Effects of alteration of streamflows on quantity and quality of stream habitat in Project-affected stream reaches	-----
-----	Extent of alteration of the unimpaired hydrograph in Project-affected stream reaches	-----
-----	Balancing the use of water for electric generation and environmental purposes	-----
-----	-----	<u>Effects of water loss in canals on water quantity</u>

DeSabra-Centerville Project No. 803-068

WATER USE AND QUALITY		
<i>Issues Listed in SD1 (3)</i>	<i>Issues Listed in PAD (12)</i>	<i>Issues from Public Scoping Meeting (7)</i>
		(SWRCB. pp 54-56 of Nov. 17 AM Transcript)
-----	-----	<u>Adequacy of the PG&E's water rights to operate the Project (SWRCB. pg 55 of Nov. 17 AM Transcript)</u>
-----	-----	<u>Effects of Project operation on Paradise Ridge water supply (pg 60 of Nov. 17 PM Transcript)</u>
-----	-----	<u>Effects of OHV use at Round Valley Reservoir and dispersed recreation use on water quality (USFS. pg 60 of Nov. 17 AM Transcript)</u>

AQUATIC RESOURCES		
<i>Issues Listed in SD1 (10)</i>	<i>Issues Listed in PAD (15)^a</i>	<i>Issues from Public Scoping Meeting (9)^b</i>
Effects of erosion caused by project operations on aquatic species and available aquatic habitat in the project reservoirs and project-affected stream reaches	Potential interruption of stream channel-forming and stream sediment-transporting processes due to Project structures in stream channels and alteration of unimpaired flows ^a	-----
-----	Potential effects of erosion and sediment transport caused by runoff from Project Roads and other hard surface runoff ^a	-----
Effects of Project operation on shoreline erosion in the Project reservoirs and project-effected stream reaches	Potential for shoreline erosion at Project reservoirs ^a	-----
Effects of existing minimum flows on aquatic habitat and fish and macroinvertebrate populations in the project reservoirs and project-affected stream reaches	Potential effects on instream habitat for resident trout in the Project-affected reaches of Butte Creek and WBFR	-----
	Potential effects on instream habitat for benthic macroinvertebrates	Potential effects on instream habitat for benthic macroinvertebrates National Forest Lands (USFS. Pg. 69 of Nov. 17 AM Transcript)
Effects of project operations on fish populations in the project reservoirs	Sustainability of fisheries in Project reservoirs	Potential effects on fish populations in Philbrook and Round Butte reservoirs (USFS. Pg. 69 of Nov. 17 AM Transcript)
Potential for fish passage upstream in Butte Creek		
Effects of project operations on fish entrainment at project dams and diversions	Significance of fish entrainment at Project diversions	Potential effects of fish entrainment (USFS. pg. 70 of Nov. 17 AM Transcript)
Effects of herbicide use in project flumes and	Potential effects of herbicide use in Project flumes	

DeSabra-Centerville Project No. 803-068

200502015034 Received FERC OSEC 02/01/2005 03:30:00 PM Docket# P-803-068

AQUATIC RESOURCES		
<i>Issues Listed in SD1 (10)</i>	<i>Issues Listed in PAD (15)^a</i>	<i>Issues from Public Scoping Meeting (9)^b</i>
canals on aquatic species	and canals	
Effects of rapid changes in project canal flows on fish stranding	Potential for fish stranding or displacement in stream channels from rapid changes in Project canal flows	Potential enhancement of canals for fish habitat (Harthorn. pg. 70-71 of Nov. 17 AM Transcript)
Potential for fish habitat enhancement downstream of the Lower Centerville Diversion Dam	Potential enhancement of fish habitat downstream of Lower Centerville Diversion Dam	Potential fish passage enhancements for anadromous fish (USFWS. Pp. 70 of Nov. 17 AM Transcript)
Effects of project operations on the transport of large woody debris	Potential effects on transport of large wood	-----
-----	Potential effects on RT&E amphibians	Potential effects on foothill yellow-legged frogs on National Forest Lands (USFS. Pg. 68 of Nov. 17 AM Transcript)
-----	Potential effects on instream habitat for mollusks	Potential effects on instream habitat for mollusks on National Forest Lands (USFS. Pg. 69 of Nov. 17 AM Transcript)
-----	Potential effects on geology and soils from use of Project spillways ^a	-----
-----	Potential effects on geology and soils from overtopping or structural failure of Project canals or flumes, or from landslides and debris flows that intersect Project canals or flumes ^a	-----
-----	-----	<u>Potential affects of Project operation of four feeder streams that are no longer being diverted (SWRCB. pg 66 of Nov. 17 AM Transcript) including effects on macroinvertebrates (USFWS. Pp. 66-67 of Nov. 17 AM Transcript)</u>
-----	-----	<u>Potential affects of the Project on aquatic resources in the WBFR downstream of Hendricks Head Dam (USFS. pg 68 of Nov. 17 AM Transcript)</u>

^a The PAD identified 15 environmental issues related to Fish and Aquatic Resources. Five of these are related to Threatened and Endangered species and are included in the Threatened and Endangered Species resource area, leaving 10 related to non-Threatened and Endangered Species Aquatic Resources. In addition, unlike FERC's SD1 which did not contain a Geology and Soils resource area, the PAD identified 6 environmental issues related to Geology and Soils. Five of these closely correspond to FERC's SD1 Aquatic Resources environmental issues and are included in this resource area. The sixth is included in the Recreational Resources resource area below.

^b Comments at the public Scoping meeting were combined for both Aquatic Resources and Geology and Soils. All additional environmental issues in these resource areas are included above.

DeSabra-Centerville Project No. 803-068

200502015034 Received FERC OSEC 02/01/2005 03:30:00 PM Docket# P-803-068

THREATENED AND ENDANGERED SPECIES		
<i>Issues Listed in SD1 (2)</i>	<i>Issues Listed in PAD (5)^a</i>	<i>Issues from Public Scoping Meeting (1)</i>
Effects of project on rare, threatened, endangered, or special status species or critical habitat		----
Effects of project on water temperature in Butte Creek for spring-run Chinook salmon	Potential effects on instream habitat for anadromous fish in the Project-affected reaches of Butte Creek	----
	Potential enhancement of salmon and steelhead passage on Butte Creek downstream of Project	Potential fish passage enhancements for anadromous fish (USFWS. Pp. 70 of Nov. 17 AM Transcript)-----
	Potential effects on water temperatures in Butte Creek for spring-run Chinook salmon	----
	Potential effects on anadromous salmonids from sediment caused by failure of Project canals and flumes	----
	Potential effects on anadromous salmonids from sediment caused by Project construction, operation and maintenance and Project-related recreation activities	----

^a As described above, the PAD identified 15 environmental issues related to Fish and Aquatic Resources. Five of these are related to Threatened and Endangered species and are included in that resource area. The remaining 10 are included in the Aquatic Resources resource area.

TERRESTRIAL RESOURCES		
<i>Issues Listed in SD1 (6)</i>	<i>Issues Listed in PAD (11)^a</i>	<i>Issues from Public Scoping Meeting (6)^b</i>
Effects of project operations and facilities on wildlife species and habitat	Adequacy of deer protection at Project canals	Potential affects of the Project on terrestrial resources in the WBFR downstream of Hendricks Head Dam (USFS. pg 73 of Nov. 17 AM Transcript)
	Potential effects of canals, flumes, and transmission lines on migration patterns of deer	Potential affects of the Project on fens on National Forest lands, especially near Philbrook Reservoir (USFS. pp 74-76 of Nov. 17 AM Transcript)
	Potential effects of Project operation and maintenance, and Project-related recreation use on RT&E species (raptors, willow flycatcher, bats, VELB, forest carnivores)	Potential affects of canals on migration of deer and other species (FERC. pg 77 of Nov. 17 AM Transcript)

DeSabra-Centerville Project No. 803-068

TERRESTRIAL RESOURCES		
<i>Issues Listed in SD1 (6)</i>	<i>Issues Listed in PAD (11)^a</i>	<i>Issues from Public Scoping Meeting (6)^b</i>
	Potential effects of Project operation and maintenance, and Project-related recreation use on aquatic mammals (otter, mink)	-----
	Potential effects on wildlife habitat fluctuating water surface at Project reservoirs	-----
Effects of project operation on vegetation	Potential effects on RT&E botanical resources ^a	Potential affects of the Project on Forest Service Sensitive plants, especially botyichium (USFS. pg 73 of Nov. 17 AM Transcript)
	Potential effects on botanical habitat caused by Project reservoirs ^a	-----
Effects of project operations on the establishment and spread of noxious weeds and exotic plants of concern around project facilities	Potential effects on presence and spread of noxious weeds ^a	Potential establishment and spread of noxious weeds (FERC. pg 77 of Nov. 17 AM Transcript)
Effects of project transmission lines on raptors	Potential effects on wildlife habitat due to reservoirs and transmission lines	Potential affects of transmission lines on raptors (USFWS. pg 76 of Nov. 17 AM Transcript)
Effects of project operations on wetlands, and riparian and littoral vegetation around project facilities and reservoirs	Potential effects on wetland, riparian and littoral vegetation community types ^a	-----
Effects of project operations on culturally important plants (for Native Americans)	Potential effects on culturally important plants (for Native Americans) ^a	-----

^a The PAD identified 6 environmental issues related to Wildlife Resources. In addition, unlike FERC's SD1 which did not contain a separate Botanical Resources section (FERC included both Wildlife and Botanical under Terrestrial Resources in SD1), the PAD identified 5 environmental issues related to Botanical Resources. These are included in the Terrestrial Resources resource area.

^b Comments at the public Scoping meeting were combined for both wildlife and botanical resources. All additional environmental issues in these resource areas are included in the Terrestrial Resources resource area.

RECREATION AND LAND USE		
<i>Issues Listed in SD1 (6)</i>	<i>Issues Listed in PAD (24)</i>	<i>Issues from Public Scoping Meeting (9)</i>
Effects of potential erosion caused by recreation activities	Potential effects of erosion caused by Project construction, operation and public recreation activities ^a	-----
Effect of project operations, including maintenance activities, on public access and recreational opportunities within the project area	Potential conflicts with other uses from lowering Philbrook Reservoir water level for periodic dam safety checks	-----

DeSabra-Centerville Project No. 803-068

200502015034 Received FERC OSEC 02/01/2005 03:30:00 PM Docket# P-803-068

RECREATION AND LAND USE		
<i>Issues Listed in SD1 (6)</i>	<i>Issues Listed in PAD (24)</i>	<i>Issues from Public Scoping Meeting (9)</i>
	Potential effects on resources on Project and adjacent lands from recreation use of Project Roads and trails	-----
Adequacy of existing recreational facilities, parking, and public access within the project boundary and ability of facilities to meet future recreational demands (including affects resulting from the Skyway Project)	Adequacy of recreation facilities to meet projected Project-induced recreation demand over the term of the license	-----
	Potential effects of closure of USFS West Branch Campground on level of use at Project's Philbrook Campground	-----
	Potential effects of overcrowding, fire hazards, and enforcement at the Philbrook Creek "Willows Area"	Potential affects of recreational use at Philbrook Reservoir near Philbrook Creek (USFS. pg 81 of Nov. 17 AM Transcript)
	Potential conflicts between USFS Special Use Permit for Enloe Hospital and other uses on Project lands or waters	-----
	Potential effects of Skyway project on increasing recreation use in Project Area	-----
	Potential effects on Project recreation use and resources from USFS off-road vehicle area adjacent to the Project	Potential affects of OHV use on National Forest Lands (USFS. pg 83 of Nov. 17 AM Transcript)
		Potential enhancement for pedestrian and mountain biking trails (NPS. pg 79 of Nov. 17 AM Transcript)
Effects of project operations on quality and availability of flow-dependant river recreation opportunities, including: whitewater boating, fishing, and swimming	Potential nexus between whitewater boating opportunities and USFS-administered lands	-----
	Adequacy of whitewater boating access on Project-affected stream reaches, particularly at DeSabra and Centerville powerhouses	-----
	Appropriateness of streamflows for whitewater boating, fishing, swimming, and recreational mining on Project-affected stream reaches	-----
	Potential streamflow augmentation for whitewater boating in Project-affected reaches may adversely affect fisheries and other aquatic resources	-----
Effects of dispersed and developed recreation use on project resources	Potential effects of dispersed and developed recreation use on Project resources	-----

DeSabra-Centerville Project No. 803-068

RECREATION AND LAND USE		
<i>Issues Listed in SD1 (6)</i>	<i>Issues Listed in PAD (24)</i>	<i>Issues from Public Scoping Meeting (9)</i>
	Potential for improving wild steelhead fishing opportunities in Project-affected reach of Butte Creek	-----
	Potential fire hazards from dispersed recreation use and Project operation and maintenance	Potential affects of littering and sanitation problems associated with dispersed recreation (NPS. pg 78 of Nov. 17 AM Transcript)
	Potential effects on dispersed recreation at Round Valley Reservoir and the WBFR downstream due to the proximity of Butte County's Humbug Summit Road.	-----
Appropriateness of existing project-related interpretative and education/recreation signs	Appropriateness of existing Project-related interpretive and education /recreation signs	-----
-----	Adequacy of authorization to use USFS lands for Project's Philbrook Campground	Potential wildfire risk at PG&E's Philbrook Reservoir land (USFS. pg 81 of Nov. 17 AM Transcript)
-----	Potential for unauthorized uses on USFS lands by Licensee's Philbrook recreational cabin lessees	-----
-----	Availability of streamflow information regarding Project-affected stream reaches, particularly for whitewater boating	-----
-----	Potential wildfire risk associated with Licensee's Philbrook recreational cabin lessees	Potential wildfire risk associated with recreation on National Forest Lands (USFS. pg 81 of Nov. 17 AM Transcript)
-----	Potential for land exchanges between BLM and Licensee may result in improved public access to these lands and changes in recreation needs	Potential land impacts due if land exchanges between BLM and Licensee go forward (BCWA. pg 87 of Nov. 17 AM Transcript)
-----	Public dumping of garbage at the BLM trail head adjacent to DeSabra Powerhouse Road	-----
-----	Potential to integrate all recreation study results to assist in identifying appropriate management options that meet recreation needs and minimize effects on resources	-----
-----	-----	<u>Concerned about the location of the property between USFS and PG&E land at Philbrook Reservoir near PG&E fee land (USFS. pg 81 of Nov. 17 AM Transcript)</u>

DeSabra-Centerville Project No. 803-068

RECREATION AND LAND USE		
<i>Issues Listed in SD1 (6)</i>	<i>Issues Listed in PAD (24)</i>	<i>Issues from Public Scoping Meeting (9)</i>
-----	-----	<u>Potential for CDPR banning of alcohol use on other streams to increase tubing use and alcohol consumption by innertubers on Butte Creek (Allen Harthorn. pg 84-87 of Nov. 17 AM Transcript).</u>

^a The PAD identified 6 environmental issues related to geology and soils. Five of these closely correspond to FERC's SD1 Aquatic Resources environmental issues and are included in that resource area. The sixth is included in the Recreation and Land Use resource area.

AESTHETIC RESOURCES		
<i>Issues Listed in SD1 (3)</i>	<i>Issues Listed in PAD (2)</i>	<i>Issues from Public Scoping Meeting (2)</i>
Effects of facilities, operations, and recreation use on aesthetic character of lands administered by the USFS	Potential visual effects of Project facilities, operations and recreation use on lands administered by USFS	Potential visual impacts from eroded spillway channels at Philbrook and Round Valley reservoirs (USFS. pg 91 of Nov. 17 AM Transcript)
Potential for development of scenic overlooks	Potential for development or enhancement of scenic overlooks	Potential for development or scenic overlooks (USFS. pg 91 of Nov. 17 AM Transcript)
Effects of project operations, including maintenance activities, on aesthetic resources in the project vicinity	-----	-----

CULTURAL RESOURCES		
<i>Issues Listed in SD1 (2)</i>	<i>Issues Listed in PAD (10)^a</i>	<i>Issues from Public Scoping Meeting (0)</i>
Effects of the continued project operation, including maintenance activities, on historic properties and archeological resources within the area of potential effect (APE) and the potential for project structures to be eligible for inclusion in the National Register of Historic Places	Potential Project effects on cultural resources	Potential Project affect on cultural sites in Project-affected reaches (BCWA. pg 94 of Nov. 17 AM Transcript)
	Potential for completing identification of cultural resources within the Project APE	-----
	Potential for evaluation of all identified archaeological and historic-era sites and individual system features for National Register of Historic Places eligibility	-----
	Potential Project effects on cultural sites in the vicinity of Coon Hollow and feeder streams	-----
	Adequacy of Project Area of Potential Effects	-----

DeSabra-Centerville Project No. 803-068

CULTURAL RESOURCES		
<i>Issues Listed in SD1 (2)</i>	<i>Issues Listed in PAD (10)^a</i>	<i>Issues from Public Scoping Meeting (0)</i>
	Potential for inclusion of specific sites in proposed cultural resource studies	-----
	Potential disturbance of historical and archeological resources by wave action at Project reservoirs	-----
	Potential effects of inundation of cultural sites by Project reservoirs	-----
Effects of Project operation on Indian tribal interests or traditional cultural properties within the APE	Potential for identifying areas of traditional or spiritual significance to Tribes	-----
	Adequacy of access to traditional plant gathering sites	-----

^a The PAD included 9 Cultural Resources environmental issues and 1 Tribal Resources environmental issues. These 10 issues are included in the Cultural Resources resource area.

DEVELOPMENTAL RESOURCES		
<i>Issues Listed in SD1 (2)</i>	<i>Issues Listed in PAD (6)^a</i>	<i>Issues from Public Scoping Meeting (0)</i>
Economic viability of the Centerville Powerhouse	Potential need for future modification and upgrade of Centerville Powerhouse	-----
Effects of proposed protection, mitigation, and enhancement measures on project economics	Economic viability of the Project	-----
-----	Potential effects of fluctuating water surface of Philbrook Reservoir on Jones Resort and local economy	-----
-----	Potential effects of Project-related recreation visitors on adjacent private land and landowners	-----
-----	Potential effects of Project management decisions on the local economy	-----
-----	Continuity of water supply benefits provided by the Project	-----

^a The PAD did not utilize Developmental Resources resource area. The issues listed in the PAD resource area called Socio-Economic Resources are listed under the Developmental Resources resource area.

Submission Contents

PG&E's comments to FERC's October 2004 Scoping Document 1 Feb_05_P803_SD1_Cmmts.doc.....	1-8
Attachment 1 PG&E's Comments on FERC's October 2004 Scoping Document 1 A1_SD1_Cmnts_Feb05.doc.....	9-11
Attachment 2 PG&E's Comments on the Pre-Application Document A2_PAD_Cmnts_Feb05.doc.....	12-12
Attachment 3 PG&E's Study Request Comments A3_SR_Cmnts_Feb05.doc.....	13-13
Attachment 4 PG&E's Evaluation of Issues Identified in PAD, SD1, and Nov 2004 Scoping Mtg A4_SD1PAD_Cmnts_Feb05.doc.....	14-24