Attachment 3

Volume II Part 2:

Updates to the Subsequent Environmental Impact Report

Order Granting In Part and Denying In Part Petitions for Reconsideration and Certifying a Final Subsequent Environmental Impact Report

Final Subsequent Environmental Impact Report
Volume II Part 2: Updates to the Subsequent Environmental Impact Report

This attachment shows changes to the Final subsequent environmental impact report (SEIR) based on comments received on the Draft SEIR. New text is shown in underline and removed text is shown in ~~strikethrough~~.

1. Section 3.2.8.2 (page 3-41, paragraph 4) is revised to say: This alternative mirrors the Proposed Project in all respects except for the volume and timing of whitewater boating flow releases below McCloud Dam. It incorporates all elements of the Proposed Project but enhances whitewater recreation opportunities by providing higher boating flows as described in water quality certification Condition 10.
2. Section 3.2.8.2 (page 3-42, paragraph 1) is revised to say: To address the potential impacts of implementing Condition 10, this SEIR compares PG&E's whitewater boating proposal (300 cfs for 11 days) to the higher boating flows (500 cfs for 11 days) identified in the rationale for water quality certification Condition 10. The Proposed Project's whitewater boating flow (300 cfs) only provides for boating-based access to the river for fishing or camping, not whitewater boating. The minimum acceptable whitewater boating flow identified by relicensing study TM-24 (Lower McCloud River Report on Recreation Flow Assessment (RL-S3) Updated February 2009) was 500 cfs.
3. Section 4.4.1.1 (page 4-10, paragraph 2) is revised to include a new footnote: Recently, through collaborative efforts of numerous federal and state agencies and the WWT, winter-run Chinook salmon eggs have been reintroduced to the McCloud River[A]. [fn.A] The reintroduction efforts described in this SEIR are not part of a permanently established reintroduction program and do not include fish passage around Shasta Dam.
4. Section 4.4.3.1 (page 4-29, Mitigation Measure BIO-1: Whitewater Flow Seasonality) is revised to include the following sentence at the end of bullet 2: FYLF breeding monitoring shall only be required when the Licensee releases flows specifically for the purpose of whitewater boating and is not necessary for operational flow releases or storm events.
5. Section 4.5.3.6 (page 4-51) is revised to include the following sentence to the caption for Figure 4-7: Note that the upper limit of Mud Creek turbidity sensors is 1,600 NTU.
6. Section 4.5.3.8 (page 4-55, Mitigation Measure WATER-1: Long-term Turbidity Control) is revised for clarity as follows: **Mitigation Measure WATER-1: Long-term Turbidity Control**. PG&E shall incorporate the following measures into the ~~proposed Erosion and Sediment Control Management Plan~~ Reservoir Turbidity Monitoring and Management Plan required by water quality certification Condition 3(B) to ensure Proposed Project operations are in compliance with the turbidity water quality objective detailed in the Basin Plan:
    - Within the first full calendar year following license acceptance and every five years thereafter throughout the term of the license, PG&E shall monitor sediment accumulation in McCloud and Iron Canyon reservoirs,

including the total amount of sediment accumulated and the percentage of reservoir volume.

- PG&E shall include within the ~~Erosion and Sediment Control Management Plan~~ Reservoir Turbidity Monitoring and Management Plan specific actions to manage the sediment in the reservoirs to avoid a future release of excess sediment into the rivers downstream (e.g., sequestration, removal, periodic release). The plan shall account for the potential effects of climate change on sediment inputs to the reservoirs. The plan shall be developed in ~~cooperation~~ consultation with ~~CDFW, SWB, and USFS~~ USFS, CDFW, USFWS, CVRWQCB, WWT, Pit River Tribe, The Nature Conservancy, and SWRCB staff.

7. Section 4.5.3.8 (page 4-55, Mitigation Measure WATER-2: McCloud Reservoir and McCloud River Turbidity Monitoring and Modeling) is revised for clarity as follows: **Mitigation Measure WATER-2: McCloud Reservoir and McCloud River Turbidity Monitoring and Modeling**. To prevent Proposed Project operations from increasing turbidity levels in the McCloud River below McCloud Dam, PG&E shall incorporate the following measures in the ~~proposed Erosion and Sediment Control Management Plan~~ Reservoir Turbidity Monitoring and Management Plan required by water quality certification Condition 3(B) to ensure Proposed Project operations are in compliance with the turbidity water quality objective detailed in the Basin Plan:
   - ~~Continuously m~~Monitor inflow turbidity from Mud Creek and the McCloud River upstream of the Mud Creek inflow, and other McCloud Reservoir inflow sources as appropriate (e.g., Huckleberry Creek);
   - ~~Continuously m~~Monitor discharge of the primary turbidity inflow sources;
   - Monitor McCloud Reservoir profiles of turbidity and temperature monthly April – November or more frequently if needed to characterize turbidity conditions within the reservoir;
   - ~~Continuously m~~Monitor outflow turbidity and discharge from McCloud reservoir;
   - Develop a numerical model of the reservoir temperature and turbidity that can be used to assist management of reservoir turbidity outflows; ~~and~~
   - Determine the effect of the reservoir and Proposed Project operations on outflow turbidity related to the Basin Plan standard and identify management actions, if needed, to mitigate and address turbidity issues. Implement the management action, as appropriate. These management actions may include, but are not limited to, installation of new multi-level intakes or changes to flows; and
   - The plan shall be developed in consultation with USFS, CDFW, USFWS, CVRWQCB, WWT, Pit River Tribe, The Nature Conservancy, and SWRCB staff.

8. Section 4.6.3.1 (page 4-81, impact determination) is revised as follows: **Impact: Less than Significant with Mitigation.** As explained below, however, Mitigation Measures TRIBAL-1, TRIBAL-2, and TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these

mitigation measures, the impact **remains potentially significant and is unavoidable**.

9. Section 4.6.3.1 (page 4-81, Mitigation Measure TRIBAL-1: Historical Properties Management Plan (HPMP)) is revised to remove the final sentence of paragraph 3: ~~The WWT shall be invited as signatory to the HPMP.~~
10. Section 4.6.3.1 (page 4-83, paragraph 4) is revised as follows: ~~The applicant must agree to this mitigation measure in order for it to take effect. If the applicant does not agree to implement this mitigation measure, the impacts the measure is intended to mitigate will remain potentially significant and will be deemed significant and unavoidable in the final SEIR.~~ Mitigation Measure TRIBAL-4 relates directly to protection of water quality and is enforceable as a condition of the water quality certification that the SWRCB may impose without PG&E's agreement.
11. Section 4.6.3.2 (page 4-84, impact determination) is revised as follows: **Impact: Less than Significant with Mitigation.** As explained above in Section 4.6.3.1, however, Mitigation Measures TRIBAL-1, TRIBAL-2, and TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these mitigation measures, the impact **remains potentially significant and is unavoidable**.
12. Section 4.6.3.3 (page 4-85, paragraph 5) is revised as follows: Whereas this is an improvement from the current Project (baseline conditions), these MIFs are not high enough, especially during the summer months, to maintain cold water habitat for winter-run Chinook salmon as described in the NMFS letter to the SWB providing additional information on anadromous fish, cultural resources, as well as the beneficial uses of cold freshwater habitat and cold-water spawning including Appendix 2 which provides Flow and Habitat Recommendations NMFS Recommended Federal Power Act Section 10(j) Conditions (NMFS 2024). To prevent lasting harm to Nur and the surrounding ecosystem central to the WWT Traditional Cultural Landscape TCR, greater water flows are required. ~~Without the fisheries specifically, the Tribe's identity, culture, tradition, ceremonies, and lifeway suffers that would significantly impact the WWT Traditional Cultural Landscape TCR. Considering that the contributing elements and character-defining features of the WWT Traditional Cultural Landscape TCR make up the TCR as a whole, the identified mitigation measures may reduce, but will not avoid, significant long-term TCR impacts.~~ For purposes of CEQA analysis, however, the possibility that a greater improvement to baseline temperatures in the McCloud River is possible does not convert the temperature improvement that will result from the Proposed Project into an adverse impact. The Proposed Project will thus not have a significant adverse impact on temperatures in the McCloud River.
13. Section 4.6.3.3 (page 4-85, impact determination) is revised as follows: **Impact: ~~Significant and Unavoidable~~ Less Than Significant**
14. Section 4.6.3.3 (page 4-86, paragraph 4) is revised as follows: Whereas this is an improvement from the current Project (baseline conditions), these MIFs are not high enough, especially during the summer months, to maintain cold water habitat for winter-run Chinook salmon as described in the NMFS letter to the

SWB (NMFS 2024). To prevent lasting harm to Nur and the surrounding ecosystem central to the WWT Traditional Cultural Landscape TCR, greater water flows are required. Increased consultation and participation with the WWT through implementation of MM TRIBAL 1: HPMP; MM TRIBAL-2: Information Sharing; MM TRIBAL-3: Tribal Consultation for Management Plans; MM TRIBAL-4 Construction, plus implementation USFS 4(e) Condition 19 and the Aquatic Biological Monitoring Plan (4(e) Condition 27) would help minimize these effects, however, without enough cold water for the fisheries specifically, the Tribe's identity, culture, tradition, ceremonies, and lifeway would suffers. ~~This would significantly impact the WWT Traditional Cultural Landscape TCR. Considering that the contributing elements and character-defining features of the WWT Traditional Cultural Landscape TCR make up the TCR as a whole, the identified mitigation measures may reduce, but will not avoid, significant long-term TCR impacts.~~ For purposes of CEQA analysis, however, the possibility that a greater improvement to baseline flows in the McCloud River is possible does not convert the flow improvements that will result from the Proposed Project into an adverse impact. The Proposed Project will thus not have a significant adverse impact on flows in the McCloud River. See also the discussion of potential temperature impacts in Section 4.6.3.3.

15. Section 4.6.3.3 (page 4-86, impact determination) is revised as follows: **Impact: ~~Significant and Unavoidable~~ Less Than Significant**
16. Section 4.6.3.3 (page 4-88, impact determination) is revised as follows: **Impact: Less than Significant with Mitigation.** As explained above in Section 4.6.3.1, however, Mitigation Measures TRIBAL-1, TRIBAL-2, and TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these mitigation measures, the impact **remains potentially significant and is unavoidable**.
17. Section 4.6.3.3 (page 4-89, impact determination) is revised as follows: **Impact: Less than Significant with Mitigation.** As explained above in Section 4.6.3.1, however, Mitigation Measures TRIBAL-1, TRIBAL-2, and TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these mitigation measures, the impact **remains potentially significant and is unavoidable**.
18. Section 4.6.3.3 (page 4-90, TCR-5 impact determination) is revised as follows: **Impact: Less than Significant with Mitigation.** As explained above in Section 4.6.3.1, however, Mitigation Measures TRIBAL-1, TRIBAL-2, and TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these mitigation measures, the impact **remains potentially significant and is unavoidable**.
19. Section 4.6.3.3 (page 4-90, TCR-6 impact determination) is revised as follows: **Impact: Less than Significant with Mitigation.** As explained above in Section 4.6.3.1, however, Mitigation Measures TRIBAL-1, TRIBAL-2, and TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these mitigation measures, the impact **remains potentially significant and is unavoidable**.

20. Section 4.6.3.3 (page 4-91, TCR-7 impact determination) is revised as follows: **Impact: Less than Significant with Mitigation.** As explained above in Section 4.6.3.1, however, Mitigation Measures TRIBAL-1, TRIBAL-2, and TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these mitigation measures, the impact **remains potentially significant and is unavoidable**.
21. Section 4.7.3.3 (page 4-98, paragraph 2) is revised to include a new footnote: Under the Proposed Project MIFs boaters would gain 500 days[B]…[fn.B] The 500 additional boating days represents gains for all types of boating identified in relicensing study TM-24. As such, not all 500 days would be suitable for all types of boating. For example, from McCloud Dam to Ah-Di-Na Campground, access-based kayaking is possible starting at 200 cfs, but whitewater boating is possible starting at 500 cfs.
22. Section 4.7.3.4 (page 4-98, paragraph 4) is revised to include a new footnote: PG&E would also be required to provide real-time water flow information on the internet (gage MC-1 at Ah-Di-Na) for the McCloud River below McCloud Dam to inform the public when water flows are safe for angling, or suitable for whitewater boating[C]. [fn.C] In addition to this requirement, Condition 1(C) of the certification will require PG&E to provide real-time flow information online for all McCloud River gages.
23. Section 5.4 (page 5-8, paragraph 2) is revised to say: "This alternative is identical to the Proposed Project in all respects except for the magnitude and timing of whitewater boating flow releases in the McCloud River below McCloud Dam."
24. Section 5.4.1 (page 5-8, paragraph 3) is revised to say: "This alternative is identical to the Proposed Project in all respects except for the magnitude and timing of whitewater boating flow releases in the McCloud River below McCloud Dam."
25. Section 5.4.4 (page 5-11, paragraph 5) is revised to say: "Alternative 1 would enhance whitewater recreation as compared to the 300 cubic feet per second boating flows in the Proposed Project by providing higher, more suitable boating flows on the McCloud River, generally ranging from approximately 500 to 900 cubic feet per second during designated release periods."
26. Section 6.5.3.3 (Determination) is revised as follows: **Determination: Not cumulatively considerable with mitigation.** As explained above in Section 4.6.3.1, however, Mitigation Measure TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these mitigation measures, the contribution to the cumulative impact **remains cumulatively considerable.**
27. Section 6.5.3.5 (Determination) is revised as follows: **Determination: Not cumulatively considerable with mitigation.** As explained above in Section 4.6.3.1, however, Mitigation Measures TRIBAL-1 and TRIBAL-3 cannot take effect without the applicant's agreement. As the applicant has not agreed to implement these mitigation measures, the contribution to the cumulative impact **remains cumulatively considerable.**
28. Section 6.5.3.6 (page 6-8, paragraph 4) is revised as follows: The cumulative effects of altered flows on ceremonial uses in the WWT Traditional Cultural

Landscape TCR could remain significant even with mitigation (see also discussion of Impact TCR-2 in Section 4.6.3. Similarly, construction, operations/maintenance, or increased turbidity (see Sections ~~6.5.3.2~~ 4.6.3.1 and 4.6.3.2 and discussion of Impacts TCR-3, TCR-5, TCR-7, and TCR-8) may have a cumulatively consideration considerable contribution to impacts on Nur, aquatic resources, ceremonies, and other Tribal practices along the McCloud River that are integral to the TCR.