



December 4, 2012

To: Shanna Murray  
Small Hydropower coordinator  
FERC  
888 first Street, NE  
Washington DC, 20426  
Efiled on FERC website

**RE: Peabody Trout Creek Reservoir – Scoping Document Comments  
Docket P- 14446**

Dear Shanna Murray,

Please accept the following comments to the Peabody Trout Creek Reservoir Scoping Document:

List of Issues and concerns

- 1) A reservoir in close proximity to roads has the potential for adverse impacts to road structure, is there an alternative that lowers the elevation and minimizes or eliminates the areas crossing CR 33 and the "fingers" or small drainage areas along CR 33 (like the one shown along Foidel Creek.
- 2) Guardrails interfere with snow plowing, the design of the road should be such that the need for guardrails is minimized.
- 3) Stormwater quality needs to be protected – provide a comprehensive stormwater management program for the project.
- 4) Applicants proposal comments
  - a. Indicates located on private land and blm – also proposes to use/relocate county right of way and that should be noted specifically
  - b. Project appears to also require some modification to CR 33 but no mention of 33 is made in the text, just cr 179.
- 5) Noxious Weeds – include a plan for weed mangament during and after construction
- 6) Dust – include a plan for dust management; even though the area may not be a non attainment area management of dust will still be required.
- 7) Revegetation – construction must include a plan for erosion control and revegetation

- 8) Winter conditions / construction schedule – travel on gravel county roads (ie cr 179) can be limited to heavy equipment during spring and fall thaw; this must be considered in the construction management plan
- 9) Access – clarify where the dam road will access CR 179, a county access permit is required and access must meet standards
- 10) Overflow and dam breach – provide an analysis if mitigation measures and safety measures to show protection of the county roads

#### Requested studies

Roadway Impact Analysis – evaluate the existing roadway structure (including drainage, bridges, fill areas, etc) and identifying mitigation required to support the construction and operations/maintenance traffic for the project.

Traffic Impact Analysis – in addition to the County’s need for a traffic impact analysis, citizens at the public meeting from adjacent areas were also interested in a traffic impact analysis. The study should follow the CDOT scope for traffic studies.

Roadway design alternatives – the project proposes to relocate County roads; any relocated road needs to be built to current county standards and must be approved by the county. We encourage meeting with the County to coordinate the road alignment and design. Any relocated roads also need new right-of-way. All work will be by developer and BCC approval for any changes is required. We see that a preliminary reservoir analysis was done, but there was not a design alternative done pertaining to road standards and effects on adjacent land.

Sincerely,

Janet Hruby  
Routt County Road & Bridge Director

Document Content(s)

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