Downey, Savannah@Waterboards

From: Dave Steindorf <dave@americanwhitewater.org>
Sent: Thursday, May 30, 2019 3:32 PM
To: Downey, Savannah@Waterboards
Cc: Ore, AnnMarie@Waterboards
Subject: Fwd: McCloud Comments
Attachments: 20100927AWFORMcCloudDEIS2.pdf; TM-24 RL-S3 Rec Flow Recon Updated February 2009.pdf

Savannah,

I spoke with Ann Marie yesterday and she recommended that I forward these comments related to the Mccloud/ Pit project on to you. Please feel free to call me if you have any questions.

Thanks,
Dave

Attached are comments that we submitted on the FERC DEIS for the McCloud/ Pit project, P-2106. These comments are relevant to content in the Neg Dec. The key points from these comments are as follows:

- The number of whitewater boating days in the DEIS is overstated. Our comments on this on this issue start on page 8 of our comment letter. The Neg Dec similarly overstates the whitewater boating opportunity that would be provided with the new flows. Table 3-8, page 3-153 states that there would be 1224 additional boating days with the new minimum instream flows. Some basic math suggests that this would require that flows would be boatable every year for the entire month of April and one week in May for the entire 32 year period of record. This is highly unlikely. I was unable to locate the reference for the information contained in this table. It does not seem correct that the informations could be referenced from the 2009 PG&E DLA but based on USFS 4e conditions that were not developed until 2010. Could you please provide a reference for these numbers. Our analysis, and the analysis in the whitewater boating study showed opportunity in only the wettest of years, and many years with very flows in the boatable range and no flow in the optimal boating flow range. (TM-24, page-25)

- The proposed ramping rate from controllable spill events, 150 cfs every 48 hours, is not protective of Foothill Yellow Legged Frogs (FYLF) and other aquatic species (See our comments starting on page 5). While we did not recommend a specific ramping rate in our comments, we suggest using this guidance from the USFS 4e rationale from the Yuba Bear/ Drum Spaulding project (P-2310,P-2266), July 30, 2012.

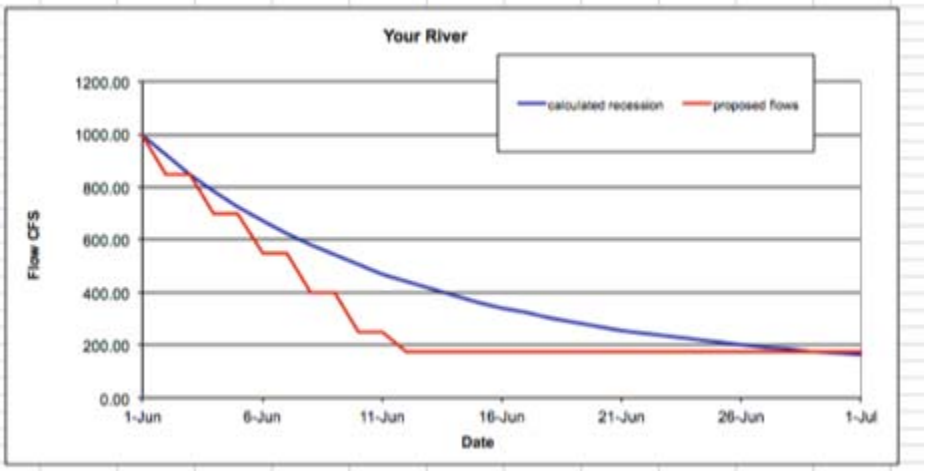
Snowmelt recession in unimpaired (unregulated) Sierra Nevada rivers averages an 8 percent per day decrease at the beginning of the recession period and a 4 percent per day decrease at the end of the recession period, (based on an analysis of eight unimpaired creeks and rivers in the region). For the period of record, 90 percent of time there was a less than 21 percent per day flow decrease and 70-80 percent of the time there was a less than 10 percent per day decrease during the snowmelt recession period (Epke 2011). At river cross-sections where frogs breed, gradual (9 percent to 3 percent) daily percent changes in flow translate to gradual changes in water depths that protect frog eggs from stranding and allow tadpoles to successfully develop through the summer (S. Yarnell, pers. comm., Lind and Yarnell 2011). p-271

Below is the calculated ramping rate schedule that would meet the criteria stated above. The calculated recession rate reduces flows at a rate starting at 8% per day and ends as flows recede to the base flow of 175 cfs at at rate of 4% per day, the blue line. The red line is the ramping rate requirement from the USFS 4e condition for P-2106, this is also what is evaluated in the Neg Dec. The proposed ramping rate requires flow reductions of 150 cfs every 48 hours. You can see that this rate drops far faster than the standard described above. USFS did not proscribe a more gradual ramping rate because some of the science around flows that are protective of FYLF had not been developed. Additionally, the FYLF populations that were identified were not on USFS property. It was discussed at the time that the SWRCB could require more conservative ramping rates in order to be more protective of FYLF and other aquatic species.

Flow to Plot

(auto fills from 'calculated' and 'proposed' flows fields; no need to edit)

Date to plot	calculated	proposed
1-Jun	1000.00	1000.00
2-Jun	921.38	850.00
3-Jun	850.21	850.00
4-Jun	785.71	700.00
5-Jun	727.19	700.00
6-Jun	674.03	550.00
7-Jun	625.69	550.00
8-Jun	581.67	400.00
9-Jun	541.56	400.00
10-Jun	504.95	250.00
11-Jun	471.52	250.00
12-Jun	440.96	175.00
13-Jun	412.98	175.00
14-Jun	387.34	175.00
15-Jun	363.84	175.00
16-Jun	342.26	175.00
17-Jun	322.43	175.00
18-Jun	304.20	175.00
19-Jun	287.41	175.00
20-Jun	271.95	175.00
21-Jun	257.70	175.00
22-Jun	244.55	175.00
23-Jun	232.40	175.00
24-Jun	221.18	175.00
25-Jun	210.81	175.00
26-Jun	201.22	175.00
27-Jun	192.33	175.00
28-Jun	184.11	175.00
29-Jun	176.49	175.00
30-Jun	169.43	175.00
1-Jul	162.89	175.00

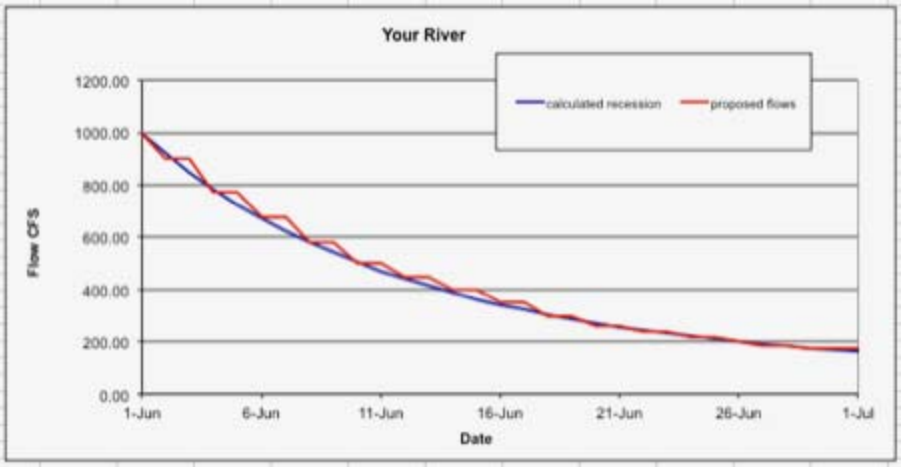


Below is a ramping schedule that more closely mimics the ramping standard outlined in the USFS 4e rationale above. This schedule would require adjustments every 48 hours, this is operationally more practical than requiring daily adjustments, however, in this schedule the flow changes become smaller as the flows drop.

Flow to Plot

(auto fills from 'calculated' and 'proposed' flows fields; no need to edit)

Date to plot	calculated	proposed
1-Jun	1000.00	1000.00
2-Jun	921.38	900.00
3-Jun	850.21	900.00
4-Jun	785.71	775.00
5-Jun	727.19	775.00
6-Jun	674.03	675.00
7-Jun	625.69	675.00
8-Jun	581.67	580.00
9-Jun	541.56	580.00
10-Jun	504.95	500.00
11-Jun	471.52	500.00
12-Jun	440.96	450.00
13-Jun	412.98	450.00
14-Jun	387.34	400.00
15-Jun	363.84	400.00
16-Jun	342.26	350.00
17-Jun	322.43	350.00
18-Jun	304.20	300.00
19-Jun	287.41	300.00
20-Jun	271.95	260.00
21-Jun	257.70	260.00
22-Jun	244.55	240.00
23-Jun	232.40	240.00
24-Jun	221.18	220.00
25-Jun	210.81	220.00
26-Jun	201.22	200.00
27-Jun	192.33	185.00
28-Jun	184.11	185.00
29-Jun	176.49	175.00
30-Jun	169.43	175.00
1-Jul	162.89	175.00
2-Jul	200.00	175.00



Providing a more natural down ramp from spill events will improve conditions for FYLF and other aquatic species, additionally these flows will provide some whitewater boating opportunity.

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