

COMMENTS

Updated Study Report On Water Temperature
DeSabra – Centerville Project (FERC No. 803)
Docket No. P-803-068
Applicant: Pacific Gas & Electric Co.

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Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission

Dear Ms. Bose:

The California Sportfishing Protection Alliance offers for the record the following comments on the Study Report for Study Plan 6.3.2-4, Develop Water Temperature Model and Monitor Water Temperatures. This Study Plan was originally dated July 15, 2005, and was revised on February 14, 2006. The Study Report for this study was most recently updated by the licensee on February 15, 2008. A follow-up letter regarding that Report was filed by PG&E with the Commission on March 14, 2008.

Background

The proposed use of this study is given, in part, as follows:

In particular, the relationship between Project operations and stream temperatures in lower Butte Creek is a central issue to understanding how to maximize the beneficial effects of the Project on spring-run Chinook salmon and steelhead. The results of temperature model simulations will be used to: 1) better understand Project effects on water temperatures in all Project-affected reaches of Butte Creek and the WBFR; 2) evaluate what Project operation alternative (or combination of alternatives) can best protect spring-run Chinook salmon and steelhead in Butte Creek from temperature-related pre-spawning mortality; and 3) evaluate the effects of Project operational alternatives on the thermal environment of other aquatic resources. [Study Plan, February 14, 2006, page 2].

Under Schedule, on page 3, the Study Plan explicitly notes that “information from this study is important for timely consideration by other studies...”.

Under Products, the Study Plan notes that

The final license application will discuss the effectiveness of each proposed operational alternative for controlling stream temperatures in lower Butte Creek relative to temperature criteria for spring-run Chinook salmon, juvenile steelhead, and other resources of interest to the relicensing participants. In addition, the water temperature report will identify the change in thermal properties in diverted reaches below the Butte and Hendricks Head dams with increases in instream flow release from these structures. This will allow the Relicensing Participants to evaluate the relative benefit of increased instream flow at project diversions with the ability to provide cool water to lower Butte Creek for the protection of aquatic resources. [page 7].

Discussion

CSPA believes that this report is not yet complete. The Study Plan on page 2 as cited above proposes that it will “2) *evaluate what Project operation alternative (or combination of alternatives) can best protect spring-run Chinook salmon and steelhead in Butte Creek from temperature-related pre-spawning mortality.*” The report has not considered a reasonable range of options to determine how to “*best protect spring-run Chinook salmon and steelhead in Butte Creek*” because it has not considered the option that would provide the greatest amount of holding habitat for adult spring-run salmon and the greatest amount of rearing habitat for juvenile steelhead: **an option which would shut down Centerville Powerhouse and Lower Centerville Canal in the summer months.** Nor has the report delivered the promised products: it promised that “*The final license application will discuss the effectiveness of each proposed operational alternative for controlling stream temperatures in lower Butte Creek...*”. Again, this is because it has not evaluated the option that would shut down Centerville Powerhouse and Lower Centerville Canal in the summer months.

This option was proposed by relicensing participants in April, 2007, and was modeled by licensee and presented to relicensing participants at a meeting on May 22, 2007 (this alternative was labeled in that presentation “Butte Creek with all DeSabra Powerhouse Flow”). However, the version of the W2-CE-QUAL model that was used in May, 2007, was subsequently recalibrated, and presented in slightly differing forms in January, February and March, 2008. The above-mentioned alternative, that results of which were presented on May 22, 2007, was never run with any of these recalibrated versions of the W2 model.

Moreover, no alternatives from model runs of the SNTEMP models have been presented to relicensing participants. Nor, clearly, have any model runs been performed which combine SNTEMP model runs with W2 model runs; this would be necessary to fulfill that part of the study plan that promises, under products: “*In addition, the water temperature report will identify the change in thermal properties in diverted reaches below the Butte and Hendricks Head dams with increases in instream flow release from these structures. This will allow the Relicensing Participants to evaluate the relative*

benefit of increased instream flow at project diversions with the ability to provide cool water to lower Butte Creek for the protection of aquatic resources.” [page 7].

Both the W2 and SNTMP models have only just been approved as adequate to use by the agency modelers with the California Department of Fish and Game, with perhaps some caveats, as of approximately April 1, 2008. Relicensing meetings on April 8 and 9, 2008 will be the first opportunity relicensing participants will have to suggest scenarios for use in these models at a time when there is buy-in regarding these models from the relicensing participants as a group. These models are essential to formulate critical management decisions about ESA-listed salmon and steelhead resources in Butte Creek.

The value of front-loading this study, its critical importance in informing other studies, was specifically noted in the study plan. There is at the very least an implied requirement to give the relicensing participants some time to use the model to evaluate alternatives. This purely and simply has not happened. What has been evaluated were a few circumscribed alternatives that the licensee alone decided were reasonable. There has been no opportunity for other relicensing participants to suggest model runs that they believe reasonable, for use in a model in which they have expressed buy-in. CSPA deferred to the resource agency engineers in refraining from suggesting model runs using previous model iterations, because we agreed that it would have been confusing and counterproductive to create model runs with models that still needed work. It is not productive to discuss the results while there is lack of agreement concerning the accuracy and validity of the tools that produced them.

We find no benefit in ascribing fault in this situation. We are pleased that we have arrived at a point where these critical temperature models are ready to be put to work. What we respectfully ask is that we have a nominal amount of time to do just that. We therefore request that Relicensing participants be given two months to work with the participant-accepted W2 and SNTMP models. By June 4, we can crank out the needed model runs in that time, and discuss them, and complete the study as described in the plan. That would delay the REA Notice by 35 days from the May 1 date presently foreseen.

Conclusion

It is in the interest of no one to end this first Integrated Licensing Process, which parties from many perspectives have at various times labeled a disaster, with a Notice of Ready for Environmental Analysis that cuts short collection of the information most critical to this process and this project. Even less, at a moment when there exists, perhaps for the first time in this heretofore perennially contentious process, an opportunity to achieve a least some measure of resolution.

Respectfully submitted,

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California Sportfishing Protection Alliance

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