STAKEHOLDER QUESTIONS AND TOPICS OF CONCERN
FOR THE YUBA-FEATHER WATER CONTROL MANUAL UPDATE AND DEVELOPMENT
(February 9th 2024)

(These questions and concerns are based on those submitted in August for the November 15th 2023 OCAC presentations by USACE & Scripts, which were not addressed)

Aside from general briefing at the Oroville Citizen Advisory Commission, stakeholders in the downstream basin have not been invited into the new Yuba-Feather WCM objective development process. Therefore, we submitted the following questions and topics for consideration. After receiving answers to these fundamental questions, a detailed set of downstream objectives will be developed, in preparation for a comprehensive stakeholders' meeting with the USACE. Such a public meeting needs to occur early enough in the process so that the objectives can still be negotiated with those who will be impacted by the revised Water Control Manual.

ER 1110-2-240 5.2
Water control plans will be developed in concert with all basin interests which are or could be impacted by or have an influence on project regulations.

Oroville Citizen Advisory Commission (OCAC) - Charter F. 2.
The commission will act as a unified voice from the communities surrounding Oroville Dam to provide public feedback and advice on best practices to the dam operator.

QUESTIONS AND TOPICS OF CONCERN

1. Please clarify the congressionally authorized flood control purpose used for the 1970 Water Control Manual and the supplemental agreements that must be lawfully followed during the development of the new (FIRO) water control manual. How might those impose limitations during the development of revised objectives for the new WCM?

2. How will the new WCM account for the functional equivalent of the 240,000 acre-feet of flood storage space that Marysville Reservoir was to provide? (Oroville 750,000, New Bullards 170,000, Marysville 240,000, equals 1,160,000 acre feet of authorized flood storage space)

3. Will the hydrology of the existing Reservoir Design Flood (peak inflow of 440,000 cfs and a 72-hour volume of 1,520,000 acre-feet.) continue to be used, or are there plans to update the Reservoir Design Flood hydrology based on current data? What freeboard space should be required?

4. Under a recent congressional bill, the sizing of the Probable Maximum Flood (PMF) will be updated every 10 years. Should the Standard Project Flood (SPF) and deviations to the WCM's rules of operation follow a similar schedule to keep pace with advance forecasting skills and increasing climate change?

5. Should Englebright Lake hydrology be incorporated into the Yuba-Feather coordinated flood operations, not only for its uncontrolled outflows, but also for its uncontrolled down-ramping/ levee slouching risks.

6. Should not down ramping regulations be measured at river gauges below the confluence of the Yuba (Boyd's Pump) instead of by spillway releases that lack any consideration of uncontrolled down ramping from Englebright Lake and local tributaries?

7. The combined watershed's accumulated Snow Water Equivalent should be included into the soil wetness index calculations that regulates the size of the flood pool at both reservoirs.

8. The calculations and raw data for the Soil Index and Snow Water Equivalent should be made available on CA Data Exchange (CDE) for public verification of adherence to flood pool requirements.

9. The spring refill curve should account for the existing water equivalency of the snowpack.

10. Forecasting skills and their "Margin of Error" percentage should be established and used in determining the start and size of early releases ahead of flood events. The higher the margin of error the sooner the start of early releases. These margins of error and early release guidance should be available for public verification.

11. The Preliminary FIRO Viability report made many recommendations but integrating them into the actual WCM process is of concern. The achievements and shortcomings within the Integration Team to protect downstream interest should be publicly shared.

12. The language within the WCM should regulate most aspects of "situational decision-making" versus assumptions of "Good Faith" decision making by dam operators, who must deal with the competing objectives of public safety and water delivery, that often leads to only what's regulatorily required actions.

13. The effects that FIRO spillway releases have on the various life-cycle stages of the river fisheries must be understood and mitigated as much as possible. Objectives requested by DF&G and US Fish and Wildlife should be disclosed with stakeholders.

14. Real time river temperatures and river flow should be monitored and posted on (CDE) for public review, along with the corresponding requirements for the fisheries.

15. The effects that FIRO spillway releases have on both lake and river recreation should be understood and mitigated as much as possible. This understanding cannot be achieved without first engaging the public.

16. Required funding aside, what infrastructure enhancements at Oroville would help achieve the above WCM objectives well into the future? The cost-benefit analysis and funding request for such infrastructure investment should will be weighed against the 50-year life of the SWC contract extensions.

17. The "wear and tear" on the Feather River levees system from the frequency, volume and duration of spillway releases conducted by a FIRO WCM should be understood and mitigated as much as possible.

18. The frequency, volume and duration of spillway releases conducted by a FIRO WCM that exceed the natural river channel will have a negative effect on the farming practices within the downstream levee system. This needs to be understood through outreach efforts and mitigated where possible

19. When flows are projected to exceed the natural river channel, an adequate notification system should be developed to reach those affected.

20. How will the objectives for the Lower Yuba Accord and Sustainable Groundwater Management be incorporated into the joint Yuba-Feather WCM objectives? How will this help protect the local water district and basin groundwater.

Compiled by the Feather River Recovery Alliance - www.notjustaspillway.com