

***Mendocino County Russian River Flood Control
& Water Conservation Improvement District***

STAFF REPORT

**Agenda Item 11d: USACE Draft Environmental Assessment
for the Coyote Valley Dam-Lake Mendocino Water Control Manual Update
Monday, August 4, 2025**

The Strategic Plan relevant priority is Security through improved river and reservoir operations.

- The goal of FIRO at Lake Mendocino is to update the 1950s-era Water Control Manual by applying forecasting advancements to increase water supply reliability without reducing - and while possibly enhancing - the existing flood protection capacity of Lake Mendocino and downstream flows for fish habitat.
- More information on updating the Water Control Manual and FIRO:
<https://rrfc.specialdistrict.org/forecast-informed-reservoir-operations-firo>

Background:

In accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. § 4321 et seq), as amended, the United States Army Corps of Engineers, San Francisco District (USACE) has prepared a Draft Environmental Assessment (EA) for the Coyote Valley Dam (CVD)-Lake Mendocino Water Control Manual (WCM) Update.

Current operations of the CVD-Lake Mendocino are governed by the existing WCM which was revised in 1986 and last updated in 2011 without the benefit of modern weather and streamflow forecasting information. The draft EA provides an evaluation and description of the proposed action to update the CVD-Lake Mendocino WCM to allow discretionary encroachment into Flood Control Space based on the 5-day deterministic streamflow forecasts provided by the National Weather Service as per Lake Mendocino Forecast-informed Reservoir Operations (FIRO) procedures that have been vetted and tried through a series of USACE-approved major deviations during Water Years 2019, 2020 and 2021-2026. The encroachment would provide water storage of up to 11,650 acre-feet into the flood control space, and USACE reservoir operators retain full operational control and authority.

The USACE is providing this notice of availability of the draft EA for public review and comment. The public comment period will run until August 16, 2025.

The Draft EA and associated appendices can be accessed by navigating a web browser to the website below and clicking on the “Draft Environmental Assessment” under the title called “Coyote Valley Dam-Lake Mendocino Water Control Manual Update” in the left-hand side of the page to open the report document. Website: <https://www.spn.usace.army.mil/Missions/Environmental/>

Recommended Board Action:

- Approve the comment letter and direct GM to submit.

Attachments:

- District comment letter on USACE Draft Environmental Assessment for the Coyote Valley Dam-Lake Mendocino Water Control Manual Update

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Prepared and submitted to the Board of Trustees by: *Elizabeth Salomone, General Manager*

Mendocino County

Russian River Flood Control & Water Conservation Improvement District

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August 4, 2025

Department of the Army
San Francisco District, US Army Corps of Engineers
450 Golden Gate Avenue, 4th Floor
San Francisco, CA 94102-3406
CESPN-CVD-WCM-Update@usace.army.mil

Dear U.S. Army Corps of Engineers, San Francisco District,

Comments on the Draft Environmental Assessment (July 14, 2025) for the Coyote Valley Dam-Lake Mendocino Water Control Manual Update

The Mendocino County Russian River Flood Control & Water Conservation Improvement District (the District) appreciates the opportunity to review and provide comments on the Draft Environmental Assessment (DEA) for the Coyote Valley Dam-Lake Mendocino Water Control Manual Update, dated July 14, 2025. The District plays a critical role in managing flood control and water supply for the communities and agricultural lands within the Russian River watershed, and as such, we have a significant interest in the proposed changes to the Water Control Manual.

We recognize the complexity of balancing water supply, flood control, and environmental needs within the Russian River system. Our comments herein are offered with the aim of ensuring the final Water Control Manual update is robust, sustainable, and adequately addresses the potential impacts on the diverse resources and stakeholders reliant on Lake Mendocino and the Russian River.

General Comments:

1. **Clarity and Specificity:** While the DEA provides a good overview, certain sections could benefit from greater detail regarding operational flexibility, specific triggers for operational changes, and the anticipated magnitude and duration of impacts under various hydrological conditions.
2. **Cumulative Impacts Analysis:** The DEA should strengthen its analysis of cumulative impacts, considering the proposed manual update in conjunction with other ongoing or reasonably foreseeable projects and stressors within the Russian River watershed, particularly regarding water quality, instream flows, and biological resources.
3. **Adaptive Management Framework:** The DEA mentions adaptive management; however, a more detailed framework describing the specific triggers for adaptation, the responsible parties, monitoring protocols, decision-making processes, and funding mechanisms would enhance the robustness of the proposed action.

(Continued...)

President
Christopher Watt

Vice President
Tyler Rodrigue

Treasurer
John Bailey

Trustee
John Reardan

Trustee
Dave Koball

Specific Comments:

1. Water Supply Reliability:

- * The DEA needs to clearly articulate the potential impacts of proposed operational changes on the reliability of water supply for municipal, industrial, and agricultural users within the District's service area. This includes potential changes in available yield during drought periods or restrictions on diversions due to instream flow requirements.
- * We request additional modeling data and analysis demonstrating how the updated manual would affect carryover storage and the ability to meet water demands under a range of hydrological scenarios, including extreme dry years, considering climate change projections.

2. Flood Control Management:

- * The District requires explicit confirmation that the primary flood control function of Coyote Valley Dam and Lake Mendocino will not be compromised or diminished by the proposed manual update.
- * We seek further clarification on how the updated manual will integrate with downstream flood management strategies and infrastructure, and if there are any anticipated changes to flood release protocols that could impact downstream communities or land use.

3. Russian River Turbidity (Referencing Appendix A: Russian River Turbidity Assessment and Proposed Plan):

- * Appendix A is critical. The District is highly concerned about turbidity levels, as they directly impact water quality and the operational costs of water treatment plants. The DEA must thoroughly assess the potential for increased or prolonged turbidity events resulting from altered release schedules, especially during storm events or reservoir drawdowns.
- * We request more detailed information on the proposed "Turbidity Assessment and Proposed Plan." This should include:
 - * Specific thresholds for turbidity that would trigger operational adjustments.
 - * A robust monitoring plan with clearly defined sampling locations, frequency, and parameters.
 - * Contingency plans for managing extreme turbidity events.
- * Analysis of the long-term effectiveness of the proposed plan in mitigating turbidity impacts on downstream water users and aquatic ecosystems.
- * Consideration of the economic impacts of turbidity on water treatment facilities.

4. Biological Resources (Referencing Appendix B: USFWS IPaC Species List & Appendix C: Russian River Biological Assessment (Aug. 23, 2023)):

- * The DEA must fully integrate and respond to the findings of the Russian River Biological Assessment (Appendix C). We are particularly interested in how the proposed operations will impact critical life stages of federally listed anadromous fish species, including Central California Coast coho salmon and Northern California steelhead.
- * Specific concerns include:
 - * Water Temperature: Analysis of how altered releases might affect downstream water temperatures, especially during critical summer rearing periods for juvenile salmonids.
 - * Spawning and Rearing Habitat: Assessment of how flow variations could impact habitat availability, gravel scour, and fine sediment transport.
 - * Migration Barriers: Evaluation of whether proposed minimum flows are sufficient to facilitate fish passage throughout the river system.
- * The DEA should detail specific mitigation measures proposed to offset any adverse impacts identified in the Biological Assessment and outline the monitoring plan for biological effectiveness.

5. Interagency Coordination (Referencing Appendix D: Interagency Coordination):

- * The District acknowledges the record of interagency coordination presented in Appendix D. We emphasize the importance of continued, robust coordination with local water agencies, flood control districts, and other stakeholders throughout the implementation phase and any future adjustments to the Water Control Manual.
- * We recommend that the DEA include a commitment to regular stakeholder engagement meetings to ensure ongoing communication and problem-solving as the manual update is implemented and adapted over time.

Recommendations:

1. Further Hydrologic Modeling: Conduct additional hydrologic modeling to refine predictions of water availability, flood risk, and environmental flows under various climate change scenarios.
2. Turbidity Mitigation Enhancements: Develop more specific and actionable turbidity mitigation strategies, including clear operational triggers and an enhanced monitoring network.
3. Detailed Adaptive Management Plan: Provide a comprehensive adaptive management plan outlining specific indicators, thresholds, and decision-making processes for adjusting operations in response to monitoring data.
4. Economic Impact Analysis: Include a qualitative or quantitative analysis of the economic impacts of potential water supply changes and turbidity increases on local water users and treatment facilities.
5. Continued Stakeholder Engagement: Formally commit to establishing a stakeholder advisory group or similar mechanism for ongoing collaboration and input post-manual adoption.

The Russian River Flood Control & Water Conservation Improvement District is committed to working collaboratively with the U.S. Army Corps of Engineers and other agencies to ensure the long-term health and sustainability of the Russian River watershed. We believe that incorporating these comments will result in a more comprehensive and effective Water Control Manual update that better serves the needs of both the environment and the communities.

Thank you for your consideration of these comments. We look forward to continued engagement on this vital project.

Sincerely,

Christopher Watt
Board President