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June 6, 2022

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Electronic Filing

Re: Southern California Edison's Proposed Study Plans and Responses to FERC's
Additional Information Request; Kern River No. 3 Hydroelectric Project, FERC Project
No. 2290-122.

Dear Secretary Bose,

Enclosed for filing in the above-referenced proceeding is **AMERICAN WHITEWATER'S
COMMENTS FOR SOUTHERN CALIFORNIA EDISON'S PROPOSED STUDY PLANS
AND RESPONSES TO FERC'S ADDITIONAL INFORMATION REQUEST FOR THE
KERN RIVER NO. 3 HYDROELECTRIC PROJECT (FERC PROJECT NO. 2290-122).**

Sincerely,

A handwritten signature in black ink that reads 'Theresa Lorejo-Simsiman'.

Theresa Lorejo-Simsiman
California Stewardship Director
American Whitewater
916-835-1460

UNITED STATES OF AMERICA

**BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

| **Southern California Edison** | **Project Name Project No. P-2290-122** |

**AMERICAN WHITEWATER’S COMMENTS FOR SOUTHERN CALIFORNIA
EDISON’S PROPOSED STUDY PLANS AND RESPONSES TO FERC’S ADDITIONAL
INFORMATION REQUEST FOR THE KERN RIVER NO. 3 HYDROELECTRIC
PROJECT (FERC PROJECT NO. 2290-122).**

I. Introduction

American Whitewater offers the following comments Southern California Edison’s Proposed Study Plans and Response to FERC’s Additional Information Request.

II. Interest of American Whitewater

American Whitewater is a national non-profit 501 (c)(3) river conservation organization founded in 1954 with over 6,500 members and 100 locally based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater’s mission is to conserve and restore America’s whitewater resources and to enhance opportunities to enjoy them safely. A significant percentage of our members reside in and travel to California for its whitewater resources. As an organization that represents the conservation interests of whitewater enthusiasts, American Whitewater has an interest in the impacts of the Project on the North Fork Kern River.

III. Comments

American Whitewater supports the comments made by the US Forest Service regarding WR-1 Water Quality, WR-2 Hydrology, BIO-1 Foothill Yellow-Legged Frog, BIO-2 Western Pond Turtle and Special-Status Salamanders, and BIO-3 General Wildlife Resources. Forest Service biologists and staff have filed meaningful and substantive comments regarding these studies that should be thoroughly considered and adopted. American Whitewater also supports the proposed addition of an additional Benthic Macroinvertebrate Study.

REC-1 Whitewater Boating

6.1 Level 1: Desktop Review of Existing Information

The river segment from the KR3 Powerhouse to the Kern River Park in Kernville should be included in Levels 1-3 of the study. It is described in Section 4.0 Study Area and Study Sites of REC-1 but not actually included in Levels 1-3 as a section which will be studied. It is a whitewater segment within the Project Area.

The structured interviews should be open to all interested stakeholders with whitewater boating experience on the Kern River, and represent a range of watercraft, skill levels and knowledge of the whitewater boating segments in the Project Area.

6.3. Level 3: Intensive study

While we appreciate that controlling specific flows below Fairview Dam is challenging, it may still be the case that during the conduct of Levels 1 and 2 of the REC-1 study, paddler preferences for certain flows, in certain craft, on certain sections of the project area might not be

adequately captured or understood. If the early phases of the study identify knowledge gaps, minor modifications to the normal operation of the project could allow for flows to be enhanced by reducing powerhouse diversion to target those flows. Level 3 of the study should include language describing the possibility of enhancing flows below Fairview dam by reducing the powerhouse diversion. SCE should make a good faith effort to provide advance notice of these opportunistic flow enhancements to local and regional paddling groups in order to create the greatest opportunity for individuals to experience the target flows and incentivize participation in the information gathering aspects of Level 3.

SCE should include an aspect of the online flow survey that gathers flow experience information related to specific dates and times. Gathering flow preference information based upon actual experiences within the project reach will provide important accuracy, when coupled with flow travel time and other aspects of Level 1 and Level 2. This information could give important additional information not otherwise captured through relying on individuals' recollection of the flow in units they believe they experienced. This might be a separate online (or physical) flow survey which is less comprehensive but designed to quickly capture users' experience of a single paddling trip, requesting information about put-in time, takeout-time, estimate of changes in flow condition throughout the course of the day, and other important qualifying information.

The current license guarantees the first 300cfs for tunnel maintenance flow, which limits the types of flow enhancements which could be made to address data gaps identified in Levels 1 and 2 of the study. SCE should include the possibility of incorporating findings from OPS-1, should they become available in time, to the extent that they describe additional flexibility in the flow

cycling regime for the conveyance system. Should findings from OPS-1 determine it is both safe and feasible to reduce this maintenance flow in order to target flows that meet knowledge gaps from Level 1 and Level 2 of the study, that additional flexibility should be incorporated into Level 3 flow enhancements.

Section 8.0. Schedule

The schedule should include the possibility of increasing the duration of Level 3 Intensive Study through Spring 2024 in the event that 2023 flows or other issues do not allow flow information to be adequately captured within that year.

REC-2 Recreation Facilities Use Assessment

The Recreation Facilities Use Assessment as presented in the Proposed Study Plan (PSP) is not broad enough to accurately capture the diversity and magnitude of recreation occurring within the Project Area. The types of improvements that should be made include changes to the schedule, sampling type, language, and data collection tools, all of which will increase the descriptive capacities of the study. Further refining of the study questions, scope, and objectives through the Technical Working Group and stakeholder engagement could prove incredibly valuable in the expansion of REC-2.

Data should be collected at not only established access points but also dispersed recreation sites throughout the Project Area. This might include users fly-fishing from pull-outs on the side of the road, mountain biking and hiking up SCE-maintained project roads away from the river's edge, or otherwise recreating outside established recreation facilities. Visitor interceptor should

include an effort to make contact with these users, either at the location that they are recreating, or on their way to or from the Project Area.

Study data should be collected in at least two modes. Visitor-intercept alone may not accurately capture all users, so an additional survey component (e.g. digital survey, accessible via QR code, website link, etc.) would add information from individuals not present on sampling days, unwilling to interact with study staff, or otherwise excluded.

The study is currently not described as gathering information from individuals in multiple languages. Regional demographics suggest that, at minimum, the in-person intercept and digital survey (if included) should be expanded to include Spanish-language questions and Spanish-fluent study staff. Additional languages should be included, as appropriate, if study contractors deem them to represent a substantive population of likely or actual respondents.

The temporal range of the study conduct needs to be expanded beyond a single Summer study season. The year-round nature of recreation within the area, and specific temporal changes in the types and quantities of recreationists from season to season, necessitates at least some visitor intercept study attempts in Spring, Fall, and possibly Winter. Trout opener users, hunting season users, and others, all utilize project facilities in different ways at different times of the year, so Summer sampling alone will not accurately meet the study information gathering goals.

Insofar as SOCIO-1 does not specifically include any additional in-person sampling in the Proposed Study Plan, a few socioeconomic questions should be included into REC-2 in order to capture the income demographics as well as likely or actual economic impact of recreationists.

SOCIO-1 Socioeconomic Analysis

The Proposed Study Plan describes SOCIO-1 as a desktop study which includes information from REC-2 survey results, SQF concessionaire data, and other sources in an attempt to quantify the economic impact of recreation-driven expenditures associated with the Project Area. It does not, but should include analysis of how these expenditures change over time and relative to the hydrologic conditions present in the North Fork Kern River. This might include additional non-desktop engagement with individuals and businesses in the region, temporal analysis of number of users between months and years through the information currently incorporated as proposed, and/or expansion of the study scope to include temporal granularity as a targeted study outcome. This temporal granularity would provide crucial information regarding possible project operational changes in order to protect, preserve, and incentivize recreation and recreationist spending in the economies of Kernville, Lake Isabella, and surrounding communities.

OPS-1 Tunnel Assessment

3.0 Study Goals and Objectives

OPS-1 is a critical study in determining prospective opportunities for flow enhancement below Fairview Dam throughout the duration of a prospective future license. It is therefore critical that the safe operational constraints of the conveyance system be thoroughly described. For this reason, the study goals and objectives of OPS-1 should be expanded to include a thorough

analysis of the types of cycling that the conveyance system is capable of, and all operational constraints associated with cycling. The Proposed Study describes specific validation of the 300cfs tunnel maintenance flow but does not describe analysis of the types of flow cycling allowed for by the project's physical limitations. This might entail describing the magnitude and frequency of dewatering which is safe and allowable, i.e. daily, weekly, monthly. This analysis should also incorporate a level of analysis of the natural cycling and any associated degradation that currently and ordinarily occurs within the tunnels. A thorough description of the current license condition's impact on tunnel integrity, possible modifications allowable in a prospective future license, and baseline degradation of the tunnels without modifications will allow for a much more robust understanding of the opportunities available through changes in the conveyance system's management than would the currently proposed study.

OPS-1 should be conducted by an independent third-party engineering firm.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Jeff Venturino', with a stylized flourish at the end.

Jeff Venturino
California Regional Coordinator
American Whitewater
707-845-3499