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…)

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.

(Continued…)

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.

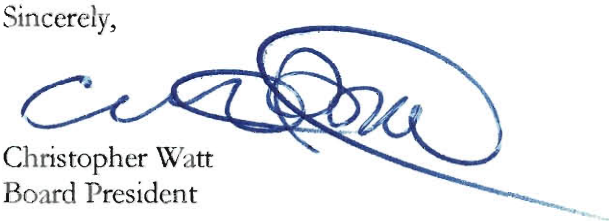
4. Economic Impact Analysis: Include a qualitative or quantitative analysis of the economic impacts of potential water supply changes and turbidity increases on local water users and treatment facilities.

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

Appendix E

Public Comments and Responses

California Department of Transportation

DISTRICT 1
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August 12, 2025

1-Men-101-27.419
Environmental Assessment
Coyote Valley Dam

Ms. Tami Church
Section Chief, Environmental Planning
San Francisco District, USACE
40 Golden Gate Avenue, 4th Floor
San Francisco, CA 94102-3406

Dear Ms. Church:

Thank you for providing Caltrans the opportunity to review and comment on the Draft Environmental Assessment (EA) for the Coyote Valley Dam (CVD)-Lake Mendocino Water Control Manual (WCM) Update. In summary, the EA will evaluate the possibility of raising Coyote Dam to increase water storage by as much as 77,000-acre feet, consistent with the original project scope from the 1950s and evaluate the potential impacts due to operation of a larger dam. We have reviewed the proposed scope of the EA and offer the following comments:

Project & Caltrans
The project appears to have a need to manage sediment and turbidity levels flowing out of the dam. If there's a need to dispose of sediment, Caltrans could be of assistance when determining locations such as possible nearby projects that could use the fill. Caltrans would encourage the US Army Corps to contact Caltrans District 1 Supervising Transportation Engineer for Maintenance Chris Ghidinelli, at chris.ghidinelli@dot.ca.gov or 707-498-0263.

Along the north shore of Lake Mendocino, Caltrans maintains State Route 20. Downstream of CVD and within the banks of the Russian River, Caltrans maintains five highways: US Highway 101, as well as State Routes 222 (Talmage), 175 (Hopland), 128 (Geyserville), and 116 (Guerneville).

With greater holding capacity in the dam, Caltrans requests that the EA evaluate whether future releases could increase the potential for scour impacts to State bridges and impact stream bank stabilization improvements beyond the baseline conditions with existing and historic winter releases. For example, will there be an established limit for how much discharge would be released

while flows are already high in the Russian River? Caltrans requests an analysis of both anticipated and potential winter releases resulting from the project to understand potential flooding and erosion along downstream state highways. Caltrans also requests this information to understand if mitigation is needed to prevent potential scouring of downstream bridges at Talmage (222), Hopland (175), South Hopland & North Cloverdale (101), Geyserville (128), Healdsburg (101), Guerneville (116) and Bridgehaven (1).

Could the new design of the outflow and release schedule be created to produce a more gradual increase in discharge rather than a sudden increase in discharge to avoid erosion of slopes along highways, Caltrans bridges and impacts to aquatic species downstream?

Will the EA include hydraulic modeling to observe potential impacts to downstream highways and bridges if there is a dam break at the increased capacity? Given climate variability, is the dam's capacity being considered for storms stronger than the current 100-year event?

Would USACE recommend that Caltrans consider raising any part of Route 20 or HWY101 to provide safe access to, from, and through highway facilities with this dam raising? Providing elevations of potential water levels in NAVD88 would aid Caltrans in making these decisions.

Will the existing Lake Mendocino access road off State Route 20 need to be closed or relocated with increased water elevation? If so, what changes will be made to the existing Lake Mendocino intersection on SR 20?

If you have any questions or concerns, please contact me at (707) 497-7742 by e-mail sent to <daniel.gjerde@dot.ca.gov>.

Thank you for including Caltrans in the USACE's scoping of its environmental assessment as it investigates the raising of CVD.

Sincerely,

DAN GJERDE
Local Development Review Coordinator
Caltrans District 1

e-copy: State Clearinghouse

Comments received on July 14, 2025 Draft Environmental Assessment

Commenter	Number	Comment	Comments/Revised Response
CalTrans	1	For example, will there be an established limit for how much discharge would be released while flows are already high in the Russian River?	The Hopland streamflow gage, and maximum flow (i.e 8,000 cfs), governing reservior releases is unchanged by this update to the water control manual.
CalTrans	2	Caltrans requests an analysis of both anticipated and potential winter releases resulting from the project to understand potential flooding and erosion along downstream state highways. Caltrans also requests this information to understand if mitigation is needed to prevent potential scouring of downstream bridges at Talmage (222), Hopland (175), South Hopland & North Cloverdale (101), Geyserville (128),	Hydraulic modeling to support the changes under this update to the water control manual were constrained by the limits of the downstream control point, and to ensure that flood risk potential was sustained or improved relative to the current flood control operations rules.
CalTrans	3	Could the new design of the outflow and release schedule be created to produce a more gradual increase in discharge rather than a sudden increase in discharge to avoid erosion of slopes along highways, Caltrans bridges and impacts to aquatic species downstream?	No physical changes to the existing infrastructure occur as a result of this update to the water control manual.
CalTrans	4	Will the EA include hydraulic modeling to observe potential impacts to downstream highways and bridges if there is a dam break at the increased capacity?	Hydraulic modeling to support the changes under this update to the water control manual were constrained by the limits of the existing infrastructure and downstream control point.
CalTrans	5	Given climate variability, is the dam's capacity being considered for storms stronger than the current 100-year event?	Hydraulic modeling to support the changes under this update to the water control manual include extreme events up to the 0.2% chance exceedance (i.e. 500-year event).
CalTrans	6	Would USACE recommend that Caltrans consider raising any part of Route 20 or HWY101 to provide safe access to, from, and through highway facilities with this dam raising?	No. This update to the water control manual is not associated with ongoing study to modify the phyisical configuration of Coyote Valley Dam.
CalTrans	7	Will the existing Lake Mendocino access road off State Route 20 need to be closed or relocated with increased water elevation? If so, what changes will be made to the existing Lake Mendocino intersection on SR 20?	No. This update to the water control manual is not associated with ongoing study to modify the phyisical configuration of Coyote Valley Dam. Physical features governing the maximum reservior pool elevation are unchanged by this update to the water control manual
RRFC&WCID	8	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.	Although having operational flexibility, various triggers, etc. are beneficial for balancing flood risk management, water supply, and environmental needs, the added complexity they present are better addressed under the April 29, 2025 Biological Opinion rather than in this update to the water control manual. Specifically, multiple working groups required in the opinion (e.g., Survival Studies Work Group, Reservior Operations Work Group, Russian River Turbidity Technical Advisory Committee) have already met and are working on these issues.
RRFC&WCID	9	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.	In general, the cumulative impacts analysis focused on the potential impacts of proposed operational changes via water control manual update combined with potential incremental impacts of reasonably foreseeable projects/future such as Eel River diversions, updated hydrology, and resilience to scaled flood events. The EA has been updated to better reflect the current state/impact of PG&Es July 25, 2025 filing and descriptions of efforts post Two-Basin solution. Additionally, the description of the Fish Habitat Flows and Water Rights Project has been amended to reglect the years TUCPs have been implemented to prevent the draining of Lake Mendocino. No additonal foreseable projects are anticipated to directly impact the
RRFC&WCID	10	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.	Although having operational flexibility, various triggers and responsible parties, etc. are beneficial for balancing flood risk management, water supply, and environmental needs, the added complexity they present are better addressed under the April 29, 2025 Biological Opinion rather than in this update to the water control manual. Specifically, multiple working groups required in the opinion (e.g., Survival Studies Work Group, Reservior Operations Work Group, Russian River Turbidity Technical Advisory Committee) have already met and are working on these issues.
RRFC&WCID	11	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.	Hydraulic analyses supporting this water control manual update demonstrated sustained management of flood risk potential and improved water supply reliability. However, the scope of the Coyote Valley Dam water control manual is for the duration of a water year.

Comments received on July 14, 2025 Draft Environmental Assessment

Commenter	Number	Comment	Comments/Revised Response
RRFC&WCID	12	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.	The flood risk management functions of Coyote Valley Dam and Lake Mendocino will not be compromised or diminished by this update. Hydraulic modeling to support the changes under this update to the water control manual were constrained by the limits of the downstream control point, and to ensure that flood risk potential was sustained or improved relative to the current flood control operations rules.
RRFC&WCID	13	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.	Turbidity in the Russian River is longstanding, complex issue not easily addressed in this update to the water control manual. A Russian River Turbidity Technical Advisory Committee(TAC) was convened in 2023 and a new turbidity monitoring program was initiated in 2024; these will continue under the April 29, 2025 Biological Opinion with specific tasks and reporting requirements assigned. Operational adjustments are actively being investigated. Overall, the TAC will serve the goal of evaluting and developing potential implementable actions aimed at reducing turbidity in the Russian River particularly as it affects Endangered Species Act-listed salmonids. Economic analysis related to this update to the water control manual was limited to impacts from potential flooding. Hydraulic analyses were used to ensure no increase in flood risk potential and expressed with the analog of no increase in flood induced damages. No further economic analyses are planned.
RRFC&WCID	14	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	The USACE and Sonoma Water currently implement extensive, ongoing fish and habitat monitoring activities; these will continue under the April 29, 2025 Biological Opinion with specific tasks and reporting requirements assigned. Also, multiple working groups required in the opinion (e.g., Survival Studies Work Group, Reservior Operations Work Group, Russian River Turbidity Technical Advisory Committee) have already met and are working on a variety of complex issues such as temperature modeling under various flow scenarios, pulse flow implementation to encourage fish migration, etc. These activities are occurring independently of this update to the water control manual.
RRFC&WCID	15	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	The water control manual includes a chapter that identifies coordination agencies that contribute and recieve information related to outflow release decisions. While implementation of the water control manual itself will not establish a stakeholder advisory group, an advisory group intented to serve similar functions is being convened as a result of the April 29, 2025 Biological Opinion.
RRFC&WCID	16	1.Further Hydrologic Modeling: Conduct additional hydrologic modeling to refine predictions of water availability, flood risk, and environmental flows under various climate change scenarios.	Hydraulic analyses were conducted to ensure no increase in flood risk potential and expressed with the analog of no increase in flood induced damages. The scope of the Coyote Valley Dam water control manual is for the duration of a water year. No additonal hydraulic analyses are planned.
RRFC&WCID	17	2.Turbidity Mitigation Enhancements: Develop more specific and actionable turbidity mitigation strategies_, including clear operational triggers and an enhanced monitoring network.	Turbidity in the Russian River is longstanding, complex issue not easily addressed in this update to the water control manual. A Russian River Turbidity Technical Advisory Committee(TAC) was convened in 2023 and a new turbidity monitoring program was initiated in 2024; these will continue under the April 29, 2025 Biological Opinion with specific tasks and reporting requirements assigned. Operational adjustments are actively being investigated. Overall, the TAC will serve the goal of evaluting and developing potential implementable actions aimed at reducing turbidity in the Russian River particularly as it affects Endangered Species Act-listed salmonids. Economic analysis related to this update to the water control manual was limited to impacts from potential flooding. Hydraulic analyses were used to ensure no increase in flood risk potential and expressed with the analog of no increase in flood induced damages. No further economic analyses are planned.

Comments received on July 14, 2025 Draft Environmental Assessment

Commenter	Number	Comment	Comments/Revised Response
RRFC&WCID	18	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.	The USACE and Sonoma Water currently implement extensive, ongoing fish and habitat monitoring activities; these will continue under the April 29, 2025 Biological Opinion with specific tasks and reporting requirements assigned. Also, multiple working groups required in the opinion (e.g., Survival Studies Work Group, Reservior Operations Work Group, Russian River Turbidity Technical Advisory Committee) have already met and are working on a variety of complex issues such as temperature modeling under various flow scenarios, pulse flow implementation to encourage fish migration, etc. These activities are occurring independently of this update to the water control manual.
RRFC&WCID	19	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.	Economic analysis related to this update to the water control manual was limited to impacts from potential flooding. Hydrualic analyses were used to ensure no increase in flood risk potential and expressed with the analog of no increase in flood induced damages. No further economic analyses are planned.
RRFC&WCID	20	5.Continued Stakeholder Engagement: Formally commit to establishing a stakeholder advisory group or similar mechanism for ongoing collaboration and input post-manual adoption.	The water control manual includes a chapter that identifies coordination agencies that contribute and recieve information related to outflow release decisions. While implementation of the water control manual itself will not establish a stakeholder advisory group, an advisory group intented to serve similar functions is being convened as a result of the April 29, 2025 Biological Opinion.
CalTrans	21	What's the CA clearinghouse number?	Standalone NEPA documents are not filed with the State Clearinghouse. There is no State Clearinghouse number associated with this document.
otter Valley Trib	22	Does this not violate the Clean Water Act (1972)?	Gaps in turbidity data and delays in reporting requirements during implementation of the 2008 Russian River Biological Opinion did not constitute a violation of the Clean Water Act (1972)
otter Valley Trib	23	Multiple technical comments received on Appendix A Russian River Turbidity: Assessment and Poposed Plan	All comments on Appendix A are acknowledged and appreciated. This assessment and proposed plan from September 2023 is a final document however, the comments received will be added to the knowledge base supporting current efforts related to turbidity as required of the April 29, 2025 Biological Opinion. Most notably, the Russian River Turbidity TAC with goals to evalute and develop potential implementable actions aimed at reducing turbidity in and discharged to the Russian River affecting listed salmonids..