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January 16, 2024

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

Electronic Filing

Re: Kern River No. 1 Hydroelectric Project (P-1930-090)  
Proposed Study Plan associated with relicensing for the Kern River No. 1 Hydroelectric  
Project under P-1930.

Dear Secretary Bose,

Enclosed for filing in the above-referenced proceeding is **AMERICAN WHITEWATER'S  
COMMENTS ON THE PROPOSED STUDY PLAN FOR KERN RIVER #1 P-1930.**

A handwritten signature in black ink, appearing to read 'Jeff Venturino', with a long horizontal stroke extending to the right.

Sincerely,  
Jeff Venturino  
Regional Coordinator  
American Whitewater  
707-845-3499

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

| **Southern California Edison**

| **Kern River #1 Project P-1930-090** |

**AMERICAN WHITEWATER'S COMMENTS ON THE PROPOSED STUDY PLAN  
FOR KERN RIVER #1 P-1930**

**I. Introduction**

Southern California Edison (SCE) is currently in the process of relicensing their Kern River #1 Hydropower Project, Project number P-1930. On October 17<sup>th</sup> 2023 they filed their Proposed Study Plan and on November 14<sup>th</sup> 2023 they held their virtual Study Plan Meeting. American Whitewater has reviewed the Proposed Study Plan, participated in the Study Plan Meeting, and offers the following comments.

**II. Interest of American Whitewater**

American Whitewater is a national non-profit 501 (c)(3) river conservation organization founded in 1954 with approximately 7,000 members and 85 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 Kern River.

### **III. Comments**

We appreciate the opportunity to provide comments on the Proposed Study Plan. We also appreciate the effort put forth by SCE staff and contractors in coordinating Technical Working Group meetings, organizing the Study Plan Meeting, and preparing the Proposed Study Plan. SCE has incorporated several suggestions from American Whitewater and the National Parks Service and we look forward to participating in the consultation opportunities describes in the Proposed Study Plan. We support National Parks Service's comments filed January 8<sup>th</sup>, and particularly laud the Parks Service for forward-thinking practicalities related to current and also prospective future demand for Project Trails and undeveloped access points within the greater project area.

#### **REC-2 Recreation Facility Use Assessment**

We appreciate SCE's inclusion of additional consultation opportunities for recreation stakeholders during the development of survey responses. A robust quantitative approach to recreational use, mindful of any safety concerns, is an important component of the study's goals to both characterize current use and also estimate future use. SCE's modifications to the Study Plan in the PSP trade some qualitative survey methodologies for quantitative analysis. We suggest both direct sampling (i.e. through trail counters and game cameras) as well as survey options for qualitative and prospective future use perspectives rather than using specifically one methodology for PAD-identified Project Trails and another for dispersed use sites. FERC's request for additional information on the PSP supports this approach and it is consistent with National Parks Service and Kern Gateway Trail user perspectives as well.

SCE will need to coordinate and obtain permission for any sampling methodologies conducted on USFS lands including any direct sampling, image collection, or camera siting. This permission should be specifically gained during the Study Planning phase of the relicensing rather than an afterthought which might occur during Study Conduct.

### **REC-3 Whitewater Boating Technical Study Plan**

The REC-3 study has been improved through the incorporation of stakeholder comments and we appreciate the effort required to put it together.

The REC-3 study continues to utilize language related to “the whitewater boating community” when referencing actionable items in nominating participants for focus groups, identifying physical sampling locations, and other issues. We believe that this ambiguity in participation is problematic and suggest SCE either specify a process for nomination conducted and coordinated by SCE staff or contractors, or specifically identify the Technical Working-Group members that will be consulted and contacted for each step. This might involve specifying e.g. a window and process for community members to nominate participants, a specific list of individuals and interested entities that will be contacted, or similar.

We also suggest that representatives of interested recreation stakeholder groups, like American Whitewater, be specifically included in study inclusion criteria, rather than requiring stakeholder representatives meet the “knowledge of the section” or “direct knowledge” criteria. Access, policy and recreation community representation experience are all relevant factors in studying the project’s whitewater boating access and flows regime and those perspectives should be included in focus groups despite the technical and challenging nature of the dewatered section and its current access points.

We appreciate SCE’s reversal on their previous indication that on-water study be precluded as an option for the prospective Level 3 study component of REC-3. The Single Flow Studies cited in SCE’s PSP as conducted by American Whitewater (citations AW 2017, 2021) were not studies conducted during a FERC relicensing process and, while interesting and relevant to their specific project and design goals, should not be used as a justification for eliminating in-person or physical assessment possibilities in relicensing whitewater recreation studies. While there is a broad community understanding and history of boating within the project-affected reach, the study’s Level 1 and 2 outcomes should not be presupposed and direct on-water boating might be one useful tool in a Level 3 Intensive Study. Currently the PSP indicates that Intensive Study should be On-Water while the Whittaker et al paper actually indicates several options for Intensive Study including: multiple flow reconnaissance; flow comparison surveys; controlled flow studies and/or supply and demand assessments. Information gathered in the Level 2 Limited

Reconnaissance portion of the study should help to guide what type of intensive study to conduct. For instance, if Level 2 study indicated a lack of user experience in the Richbar section at 1300cfs because of project operations then a Controlled Flow study might be indicated. If limited reconnaissance instead suggested that flows were well-described but several watercraft types had competing flow preferences then Intensive Study on flow preferences and comparative preferences might be preferred. As in REC-2 stakeholder consultation and participation will be important to accurately capture whitewater boating preferences and opportunities in the reach.

The currently-described controlled flow study timeline of 2 to 3 days lead time for boater participants is not adequate. Flows from Isabella are more predictable than that and analysis of the hydrologic data, conversations with the Water Master, and other Level 1 & 2 study investigation steps should provide opportunity to give a much greater lead time for a controlled flow study. Two to three days advance notice for a controlled flow study greatly limits the type of paddlers that could participate and will hamper data collection.

Thank you for the opportunity to provide comments on this matter,

Jeff Venturino

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