

Jennifer Watts - DRAFT 401- COMMENTS

From: Robert Penn <rapenn1@yahoo.com>
To: JENNIFER watts <JWATTS@WATERBOARDS.CA.GOV>
Date: 10/25/2011 3:52 PM
Subject: DRAFT 401- COMMENTS

Jennifer Watts, Environmental Scientist
Water Quality Certification & Special Programs Unit
Division of Water Rights
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000
Ms. Watts

October 25, 2011

Since it was at my request you secured approval to present a draft 401 on ferc project 2101 let me thank you very much for that consideration. The opportunity to review and comment on this massive project, specifically Iowa Hill, is particularly important given the fact that not a single County agency or representative reviewed the CEQA documents."

While reading the 401 draft I'm reminded of your suggestion to SMUD, in June 08, that they seriously consider decoupling the Iowa Hill project from the relicensing of the UARP, mainly due to a dearth of data, a lack of specifics, and so many unknowns. This draft suggests that not much has changed, e.g.; NO fire plan, given the very real probability that citing SMUDS cavalier attitude and history (they started the huge Ice House fire years ago) they, SMUD, will start a fire that seriously damages watershed, and causes totally unacceptable levels of sediment flow, and degraded water quality! Cavalier attitude? When discussing fire protection for surrounding communities several years ago, the best the risk analysis manager for smud, could give us was " Check your home fire policies"!!

The other major omission in the draft is the absence of any conditions on road construction of new or upgrading of existing road beds!! Serious sediment flow problems will result if, for example, the southwest connector road is attempted with the severe slopes and required switch backs. Both the present boat launch and slab creek access roads will require upgrading and sediment flow control and/or containment. ALL road construction related to Slab creek and Iowa Hill should meet, at least the same standards called for in the new, for example, Luther pass, highway 89, road work protecting Lake Tahoe. Smud should not be allowed to move one yard of soil until these questions on fire and road construction are resolved.

Again, thank you allowing us to participate in this process. We hope that possibly, some of our input might be beneficial to your work on this project!

Bob Penn
Chair. Iowa Hill Action Committee.
530-626-0615