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SECRETARY

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FEDERAL ENERGY
REGULATORY COMMISSION

October 17, 2004

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: FERC Project 2105

Dear Sir:

I am disturbed regarding the ongoing Federal Energy Regulatory Commission (FERC) Project 2105 discussions and their focus on installing thermal curtains to remove cold water from Lake Almanor and Butt Valley Reservoirs. In this regard, I'd like to bring several points to your attention:

1. I suggest to you that "thermal curtains" is a euphemism for a fabric that would be suspended from lake surface to lake bottom from large-diameter, metal buoys similar in appearance to propane tanks. In the case of Lake Almanor, the buoy system would be 2600 feet long and would require a great deal of hardware to install and anchor. Two thermal curtains would be installed in Butt Valley Reservoir.
2. Though discussions have been ongoing for over three years, the public has only recently become aware of them because "protocols" adopted in the beginning prohibited participants from revealing their contents.
3. It has been stated by agency and non-agency biologists, including biologists from the California Department of Fish and Game (CDFG), that removing cold water from Lake Almanor (estimated 40% of the cold water pool) and Butt Valley Reservoir would likely cause substantial harm to these aquatic ecosystems, the extent of which is unknown. Lake Almanor is currently an excellent fishery and Butt Valley Reservoir is considered a trophy trout fishery.
4. It has been documented that both PG&E and CDFG believe the temperature modification proposal is a poor alternative: "Based on results of physical model studies and their projected temperature benefits, PG&E and CDFG have separately concluded that equal or greater protection and enhancement of NFFR fishery resources would result if PG&E provides funds for fishery enhancement and projects than if PG&E fulfills the Agreement temperature control and monitoring requirement". (Draft Environmental Assessment for a New License, Rock Creek-Cresta Hydroelectric Project, FERC Project 1962, November 1996, pg 66.)

5. The estimated cost of installing the thermal curtain systems on the two lakes is now at \$53 million and has increased more than five fold in the last two years. Annual maintenance costs are unknown. PG&E ratepayers would foot the bill.

6. It has been shown that temperature modification is not cost-effective: "The Temperature Modification proposal, does not come close to justifying its cost, as calculated by FERC methods. Whether it is considered as a self-standing option or in combination with the 1991 Agreement, or the CDFG proposal, the annual cost of \$1.9 million is not a cost-effective way to spend ratepayers money". (Final Report: A Cost-Benefit Analysis of Flow Alternatives Associated with PG&E's Rock Creek-Cresta Project, PG&E Company Contract #4500557981, prepared by Decision Resources and submitted by Marvin Feldman, Ph.D., December 28, 1999, pg 36)

7. Lastly, the sole purpose of installing the curtains is to lower the temperature in a five-mile reach of the North Fork of the Feather River, several miles downstream from Lake Almanor, by one degree Celsius for one or two months each year. Modeling suggests that even this miniscule reduction in temperature would not have been achieved in the last 17 of 32 years due to dry winters.

I am a recently retired natural resource professional. I suggest to you that the Project 2105 discussions regarding this issue have gone awry and are not in the best interest of Californians. I exhort you to confirm these facts for yourself and to help put an end to the egregious concept of thermal curtains for Lake Almanor and Butt Valley Reservoir.

Sincerely,



Russell T. Leako