

September 19, 2004

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Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426 (Attn: FERC Project 2105)

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OFFICE OF THE
SECRETARY
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FEDERAL ENERGY
REGULATORY COMMISSION

To Commission Members,

I am a member of the current collaborative effort to develop a recommendation for the new license to generate hydroelectric power within the FERC Project 2105 boundary. As an active participant in the negotiations, I am deeply concerned about the proposal to consider installation of Thermal Curtains, one at Lake Almanor and two in Butt Valley, for the purpose of drawing cold water to the Rock Creek-Cresta area. The current estimate to implement this proposal is in excess of \$51 million dollars, with the costs to be borne by ratepayers. To me, and other members from Plumas County, this proposal is unconscionable when one considers the following information: (1) Data submitted by P.G.&E.'s studies indicate that the proposed thermal curtain approach will not reduce the downstream waters during "dry" or "critically dry" water years, and a review of water year information, during the past 33 years, indicates that half of them were either dry or critically dry years; (2) During "wet" and "normal" years, this could improve the temperature one degree, during the months of July and August; (3) Implementation of curtains will reduce the cold water pool at Lake Almanor, impact that habitat for trout, alter the passage of pond smelt to Butt Valley Reservoir which will basically eliminate that body as a trophy trout fishery; (4) The commission (FERC) reviewed the matter in the 1990s during the relicensing process for Rock Creek, and concluded that it was not a reasonable thing to do. In your 1 November 1996 Draft Environmental Assessment for Project 1962, you concluded on page 66 that "fishery enhancement measures would provide greater benefits for fishery resources than could be obtained by installing temperature control structures at Prattville and Caribou No. 2 intakes." You then recommended that PG&E focus on fishery improvements in lieu of temperature modifications. We, in the collaborative, understand the importance of attempting to find a satisfactory solution for water temperature reduction in the Rock Creek-Cresta Reach, but we are frustrated by the unwillingness of PGE to present alternatives approaches to the members as a follow up to your recommendation.

I also write this letter as chair of the Plumas County Sub-committee on Water Quality, an advisory board to the County Board of Supervisors. We have advised them of the probable negative effects on the quality and clarity of the lake, if the proposal for a curtain is implemented. There is evidence that increased algae bloom and increases in waterborne bacteria occur as our lake level is reduced and the water temperature increases during the summer months. There is also the possible impact of increased silt level in the lake due to the necessary dredging that is part of the plan to install the curtain—the Maidu nation has serious concerns that such dredging may desecrate ancient Maidu burial sites known to exist under the lake.

Given this information, I am asking for support from your agency to ask P.G. &E. to seek alternatives as you recommended in an effort to reach a satisfactory solution of this issue, one that all the members of the collaborative " can live with".

Thank you.



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