

ORIGINAL

September 20, 2004

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

FILED  
OFFICE OF THE  
SECRETARY OF THE  
FEDERAL ENERGY REGULATORY COMMISSION  
2004 SEP 29 10 48 03  
WASHINGTON, DC

Re: FERC Project 2105 – “Save Lake Almanor” (Lake Almanor, California)

TO WHOM IT MAY CONCERN,

On September 2, the FERC Project 2015 Licensing Group (LG) Collaborative met in Chester, CA, to continue to address the difficult issue of attempting to satisfy downstream fishery enhancement requirements for the North Fork, Feather River (NFFR). I was disappointed to note that there was no representation at that important meeting from the State Water Resources Control Board (SWRCB) or the Department of Fish & Game (DFG). The fact that SWRCB and DFG representatives to the Project 2105LG Collaborative chose not to attend means that they must now depend on the interpretation of others regarding the content and nuances of the meeting.

Approximately 200 local citizens and representatives of the Mountain Maidu Tribal Council did attend the September 2nd meeting, to convey their concerns to the Collaborative and to seek clarification of key issues. Sadly, very little new information was provided by the Collaborative. As a result, the public is left with many unanswered questions about the overall environmental impact of the proposed thermal curtains at Lake Almanor and Butt Valley Reservoir. While it is clear that thermal curtains will indeed allow Pacific Gas & Electric Company (PG&E) to selectively extract cold water from Lake Almanor, the downstream effectiveness of such an approach remains very much in doubt. Furthermore, studies to date indicate that the ecological impact on the upstream fisheries will be extremely detrimental.

Many of the concerns expressed during the September 2nd meeting are summarized in a locally generated website found at <http://www.SaveLakeAlmanor.org>. Rather than repeat that material, I would like to focus this letter on the three issues discussed below.

**The Water Temperature Requirement**

PG&E has indicated that the entire issue stems from a mandate imposed upon them by the FERC Project 1962 relicensing agreement for the Rock Creek – Cresta reach of the NFFR, wherein they are obligated to seek “reasonable” means of reducing the summertime water temperature in that downstream region to no more than 20 degrees Celsius. I would venture to say that nobody doubts that trout would prefer cooler waters in the summer, but there have been no reported cases of significant downstream fish kills as a result of the existing water temperature profile on the NFFR, leading to skepticism regarding the notion that there is a current “problem.”

So far as has been revealed to the public, there are no historical records of actual NFFR water temperature measurements in the Rock Creek – Cresta reach during the critical months of July or August prior to the installation of dams or hydroelectric facilities. Thus, there is no historical baseline to scientifically corroborate a “requirement” that the water temperature be reduced.

Perhaps the only comparable source of data would be the Middle Fork of the Feather River, which has no dams or hydro facilities, is roughly the same length as the NFFR, and originates as a cold water stream in the Sierras. At an earlier Project 2105LG meeting, it was reported that water temperatures in the lower reaches of the “natural and free flowing” Middle Fork do indeed exceed 20 degrees Celsius during the warmest summer months.

Given all these elements, you can understand why the public finds scant evidence of a water temperature "problem," nor a "requirement" for temperature reduction.

**FERC's Earlier Conclusion**

The goal of downstream water temperature reduction and the proposed usage of thermal curtains to achieve that goal are not new ideas. Both were explored during the relicensing of the Rock Creek – Cresta reach of the Feather River. The Federal Energy Regulatory Commission (FERC) reviewed the matter in the 1990s during that relicensing process, and eight years ago apparently concluded that it was not a reasonable thing to do. In their 1 November 1996 Draft Environmental Assessment for FERC Project 1962, they 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." FERC then recommended that PG&E focus on fishery improvements in lieu of temperature modifications.

Given this prior top-level conclusion, is it any wonder the public is demanding to know why the discredited cold water extraction / thermal curtain concept is once again being studied at great expense?


**The Analysis Approach**


One major underlying concern regarding the studies that have been released to date is that they tend to focus on pieces of the river rather than on the overall river system or watershed. So far there has been very little evidence of an ecosystem or watershed viewpoint when considering either the effectiveness or impact of the thermal curtain proposal. This lack of a "big picture" perspective runs a significant risk of missing important elements in planning, implementing and assessing the scientific analyses.

A second major analysis concern is that PG&E, its consultants and the agency analysts participating in the Collaborative have focused exclusively on the thermal curtain alternative to the exclusion of all other possibilities. This is a critical deficiency that leads to dogmatic allegiance to a single option no matter what. Such narrow thinking suppresses innovation, results in missed opportunities and leads to a perception of arrogance on the part of the Collaborative.

I believe that FERC had it right in 1996 -- the cold water extraction / thermal curtain approach is ineffective and damaging to the environment. It's time to move on to a better option.

Sincerely,  
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