

ORIGINAL

361 Osprey Loop  
Chester, California 96020

27 September 2004

FILED  
OFFICE OF THE  
SECRETARY  
2004 OCT -4 P 4:00  
FEDERAL ENERGY  
REGULATORY COMMISSION

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

Attn.: FERC Project 2105

Ref.: (a) FERC DEIS-0172D, of September 2004

Greetings:

The reference (a) draft environmental impact statement deals with FERC Project 2105, involving the relicensing of Pacific Gas & Electric Co. (PG&E) hydroelectric facilities on the upper reaches of California's North Fork, Feather River (NFFR). Having reviewed the document, I would like to offer the following comments.

The alternative recommended by FERC in Section 5.2.1 appears to be reasonable and appropriate with respect to the issues fully addressed in the DEIS. However, there is a major issue that is NOT addressed in the document, largely because PG&E and other involved parties have not yet provided full disclosure to FERC. That issue involves the apparent plan to selectively extract cold water from Lake Almanor and send it downstream to cool the lower reaches of the NFFR, in response to an agreement found in the FERC Project 1962 relicensing of the Rock Creek - Cresta reach of the river.

The cold water extraction scheme involves, among other things, the use of thermal curtains at Lake Almanor and adjacent Butt Valley Reservoir. If implemented, the scheme will definitely impact the limnology of Lake Almanor and Butt Valley Reservoir, but will produce only a very minor reduction in the summertime water temperature of the Rock Creek - Cresta reach. Furthermore, it will have no beneficial impact downstream during "dry" or "critically dry" water years, when reduced water temperatures would be most important. Thus, the scheme is both relatively ineffective in achieving improved downstream trout habitat, and detrimental to the upstream habitat. This is not the kind of ecological stewardship that the American public expects.

From a cost-benefit viewpoint, the situation is at least as dismal. Current PG&E estimates place the initial costs at roughly \$53 million, with annual maintenance costs running in excess of \$100,000 per year. These costs would be required to achieve, during favorable "wet" or "normal" water years, about a one (1) degree Celsius reduction in downstream water temperature. By any standard, this is an unreasonable cost-benefit relationship. Insult is added to injury when we find that the cost of this ill-conceived program would be borne by PG&E customers in the form of increased utility rates.

Because this major issue has not been fully addressed in the FERC DEIS, I would suggest that any near-term relicensing agreements for North Fork, Feather River be handled as provisional or interim documents, pending a satisfactory resolution to the water temperature matter.

In pursuing the water temperature issue, I would recommend that FERC require the applicant to provide full disclosure with regard to historical data, studies / analyses, and

alternative courses of action. I would bring the following specific items to FERC's attention, with the suggestion that these may provide important insights:

- Historic measurements .... actual water temperature measurements in the lower reaches of the NFFR, taken during the summer months of concern, prior to the installation of dams and hydro facilities (to date, no historical measurements have been provided that would substantiate the "requirement" for lower summertime water temperatures downstream).
- Historic salmonid range .... verifiable accounts of Chinook salmon range in the NFFR, prior to the installation of dams and hydro facilities (there apparently are other accounts, including Native American, that conflict with those referenced by Yoshiyama, et al.).
- Heritage site locations .... determination of the location of Native American (Maidu) cultural and burial sites now inundated by Lake Almanor (such sites may be in the underwater areas that PG&E would excavate as part of the thermal curtain installation).

Thank you for the opportunity to provide feedback on a matter that is very important to those of us who live in and cherish the mountain environment around Lake Almanor.

Sincerely,



Dale Knutsen