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FEDERAL ENERGY
REGULATORY COMMISSION

State Water Resources Control Board
P.O. Box 2000
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Attn: Sharon Stohrer

Subj: Scoping Comments – EIR for FERC Project 2105 Water Quality Certification

Ref: (a) SWRCB letter of 14 September 2005, Invitation to Participate
(b) Handouts from the 27 September 2005 CEQA EIR Scoping Meeting in Chester, CA

Greetings:

Thank you for the ref (a) invitation to participate in the public scoping process for the California Environmental Quality Act (CEQA) environmental impact review (EIR) of the relicensing of Pacific Gas & Electric Company (PG&E) facilities on the North Fork of the Feather River, otherwise known as Federal Energy Regulatory Commission (FERC) Project 2105. After attending the 27 September meeting and reflecting on the ref (b) handouts provided there by the EIR analysis contractor, I would like to take this opportunity to comment on what I believe to be a fundamental issue in this matter.

As a former analysis team leader for the Department of the Navy, I appreciate the challenge facing the analysts involved in this important effort. The complexity of the problem and the diverse nature of the postulated alternative solutions create a formidable matrix of issues to be resolved. Fortunately, a great deal of relevant information has already been acquired or generated over the past months, which should assist the analysts in the initial screening process and hopefully in the subsequent detailed assessments as well. But before the detailed assessment stage is begun, and indeed even before the initial screening gets underway, there is an important first step in any credible scientific analysis: examination of the basic question, assumptions and conditions. It does little good to chase answers to the wrong question or to apply inappropriate assumptions.

With that in mind, I noted some puzzling elements in the ref (b) handouts. First, on the chart entitled "Basin Plan" it was indicated that Lake Almanor is both a "warm freshwater habitat" and a "cold freshwater habitat." I'm not quite sure how both temperature classifications can apply simultaneously to the same body of water, but apparently this strange dual designation exists by decree if not by scientific reasoning. Even more puzzling is the designation of the North Fork of the Feather River (NFFR), downstream of Lake Almanor, as only a "cold freshwater habitat." I am not aware of any natural processes that can take warm water flowing out of a lake, chill it, and send it on its way as a cold water stream. If the NFFR downstream of Lake Almanor is indeed a cold water habitat, wouldn't its primary source (the lake) also be strictly a cold water habitat?

A bit later in the handout package, on the chart entitled "Important Water Quality Objectives for Fishery Resources," there are a series of water temperature measurements displayed that reflect conditions at various locations down the NFFR. The measurements were all taken in July of 2002, and show a gradual increase in water temperature with downstream

distance. By the time one gets to the Rock Creek - Cresta reaches, both the mean and maximum measurements exceed 20 degrees Celsius.

Located several degrees below those measurements is a dashed line identified as "Estimated Natural Mean Daily Temperature based on July 2002 Observations." The source for this estimate is not clear, and in fact the trend is puzzling when compared with water temperature measurements taken on the Middle Fork of the Feather River (a stream which does not have dams or other man-made impoundments). This "estimate" of historic conditions in the NFFR seems to be at the heart of the entire water temperature issue. Is it based on actual historic summertime water temperature measurements of the NFFR before dams were constructed? If our current understanding of Feather River hydrology is brought into play, is the analytical process that developed the original estimate still considered valid? And how could the "natural" North Fork be so much colder than the Middle Fork? Or was the "estimate" simply conjecture and wishful thinking?

PG&E and the participating agencies have been striving to find a practical and affordable way of lowering the summertime water temperature in the NFFR lower reaches to meet a requirement levied by SWRCB, specifically that such temperatures not exceed 20 deg. C. But from what has been divulged to date, that temperature figure is not substantiated by scientific measurement. Unless the EIR can validate this apparently arbitrary temperature figure, by using sound science and avoiding speculation, the credibility of the entire analysis effort is jeopardized.

If the 20 deg. C. figure was simply a noble goal and not a corroborated historic measurement, then now would be the time to make that clear. Pushing this fundamental issue aside and declaring the 20 deg. C. figure to be sacrosanct by fiat would move the EIR effort outside the realm of science and place it clearly in the political arena. The choice is up to SWRCB and the EIR analysis team. The public will take note of how that choice is made.

Sincerely,



Dale E. Knutsen

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