

Michael Derrig  
1006 Timber Ridge Rd.  
Lake Almanor, CA 96137  
27 June 2021

ORIGINAL

RE: FERC Project 2105

Kimberley D. Bose:

I am writing to express my concerns that (FERC) Project 2105 will have devastating negative impacts to beautiful Lake Almanor and the already struggling economies of the surrounding rural communities. Project 2105 is a federally licensed and regulated hydro-electric project that is owned and operated by Pacific Gas and Electric Company (PG&E). A significant feature of the project is Lake Almanor.

There is little in the State Water Resources Control Board (SWRCB) Draft EIR regarding the effects of this project and as a retired professional Hydrologist I strongly disagree that increasing the water temperature of Lake Almanor and depleting the lakes coldwater pool will not have a "significant impact". I question how the State can adequately analyze effects when the Draft EIR states that additional flow releases may be necessary if the temperature modeling is incorrect. The EIR is full of "if then" statements. How do you effectively analyze such a wide ranging moving target? The proposal to release more water from the deepest part of the lake will deplete the already limited coldwater pool, thus impacting not only water quality but will greatly reduce the cold water fisheries that have made Lake Almanor one of the best trophy trout fishing destinations in California. These observations are supported by data in the final draft of the Lake Almanor Water Quality Report, 2020. With the decline of timber industry, the local economies depend on this recreational resource. Currently, the limiting factor affecting trout production within the lake is the extent of the coldwater pool during the summer months. To reduce this even further will not only devastate the fishery but will cause a chain reaction affecting other critical species as well. For example, approximately 35 percent of California's Western Grebe population utilizes Lake Almanor for breeding. These birds are sensitive to changing lake levels and feed heavily on the primary forage fish, the Japanese Pond Smelt. These fish also depend on the coldwater pool and the resulting healthy water quality, yet the Draft EIR states that a plan will be developed to address this concern. How does the yet to be developed plan ensure Western Grebe populations will not be adversely impacted? In addition the Greater Sandhill Crane, a species listed by the State of CA as threatened utilizes shallow wetlands such as those in the upper lake for foraging and may be impacted by lower water levels.

It makes no sense to sacrifice Lake Almanor and it's surrounding rural communities to satisfy a downstream temperature criteria contained within the black and white of the SWRCB's Basin Plan. This Basin Plan designates the North Fork of the Feather River as a coldwater habitat. Where is the historic data that justifies this designation? This designation appears arbitrary and the Basin Plan needs to be amended to reflect that. Furthermore, this section of river which is above Oroville Dam is heavily altered and regulated by extensive hydroelectric development. It's a marginal fishery at best and will never be what it was prior to this development. Also, there is no guarantee that the proposed 250 cfs release will achieve this designation however it appears the SWRCB is unwavering in it's efforts to reduce the water temperature approximately three degrees to satisfy an unsupported designation buried deeply within a plan regardless of the environmental and economic consequences. I say this because beginning in 2002, a group of interested parties worked collaboratively to reach a settlement agreement in March 2004. The Settlement Agreement was executed by the parties in April 2004, except for the SWRCB. I also question the mysterious temperature modeling based on a 19 year period of record both within the lake and downstream that the SWRCB uses to justify it's assumptions, one of which is acknowledging that they really don't know if the criteria is attainable and the coldwater pool effects. Once again, is it worth sacrificing so much for one arbitrary criteria in the Basin Plan based on speculative modeling and inadequate effects analysis?

On behalf of the communities surrounding Lake Almanor, the wildlife and fish that depend on a healthy lake ecosystem, and the many Californians that visit Lake Almanor and marvel and are inspired by it's natural beauty, I am opposed to Alternatives one and two of the SWRCB's 2014 draft, and now Alternative three of the SWRCB's 2020 draft. I strongly urge you to support the PG&E project as submitted and approved in the Settlement Agreement of

April 22, 2004 without the additional release of cold water from Lake Almanor. Thank you for considering my comments.

Respectfully,

*Michael J. Derrig*

Michael J. Derrig

Document Content(s)

15826061.TIF.....1