Bryan Daniels, Chester, CA.
Kimberly D. Bose, Secretary
FERC

3/14/22

RE: Re-licensing Lake Almanor & proposed release of cold water (Project 2105):

Dear FERC Commissioners:
I have deep concerns that the temperature requirements added to the re-licensing process of the hydro-electric project operated by PG&E Company located in Northern California in Plumas County at Lake Almanor (the 2105 license) will have a devastating negative impact on our community. Especially harmful will be the supplemental cold-water withdrawals from Lake Almanor envisioned by the water quality certification during summer months to reduce water temperatures in the North Fork Feather River envisioned in Conditions 1(B) and 6 of the water quality certifications should those conditions be included in the new license. It will harm the local economy, degrade the local environment, & harm local families & local wildlife, all dependent upon the lake. These impacts will be especially onerous considering they will be added to the recent devastation caused by the Dixie Fire, a Presidentially Declared Disaster that burned over one million acres of timber locally. Therefore, I ask for your support of the original 2004 Settlement Agreement, as explained below. The license should be issued ASAP & include the water releases agreed to in the original Agreement.

The process of re-licensing the hydroelectric project operated by the PG&E Company at Lake Almanor has been unduly tricky. A collaborative group of stakeholders (the 2105 group) worked diligently in 2004 to come to a Settlement Agreement which was thrown into chaos by the addition of a requirement for a 3-degree Celsius temperature change nine miles downstream in the outflow river by the CA State Water Resources Control Board (SWRCB). This caused the license not to be issued. During your review of the Project 2105 Licensing, I ask that you honor and uphold the April 22, 2004 Settlement Agreement filed on behalf of the Project 2105 Licensing Group addressing reservoir lake levels, stream flows below project dams, water quality monitoring, wildlife habitat enhancement, and recreation enhancements and not allow any additional releases of cold water from Lake Almanor.

As analyzed in the Revised Draft Environmental Impact Report for the Upper North Fork Feather River Hydroelectric Project FERC Project No. 2105 (May 2020), all three proposed Alternative proposals to lower the temperature of the outflow river would result in temperature increases in Lake Almanor, which could decrease the fish habitat and increase the algae content in Lake Almanor. As is written in the report:
â€œThe percentage of available habitat lost is largest for all alternatives in late August ranging from 23 percent in normal years to a 100 percent loss in critically dry years.â€
Significantly, the report states that:
â€œBecause 2020 was a dry year, oxygen levels dropped too low levels during the summer, similar to what happened during the drought years of 2014 -1016. Also, algal populations, especially the blue, green algae, reached bloom proportions.â€
The report also states:
â€œSome species of these (blue-green) algae can produce toxins that are harmful to children and pets.â€
The State Water Boardâ€™s regulatory responsibilities are that natural water temperatures shall not be altered unless it can be demonstrated to the satisfaction of the Regional Water Board that such alteration does not adversely affect beneficial uses. But the proposals WILL ADVERSELY AFFECT practical uses, & these adverse effects can only be eliminated through intensive mitigation. As stated in the report:
â€œAs a result of the smaller total habitat volume in August, the model predicts the largest relative changes of -8, -13, and -100 percent reduction in cold water habitat on days with the least cold water habitat in for normal, dry, & critically dry years, respectively. During critical dry years, the model also predicts no suitable cold water habitat in the last two weeks of August for both baseline & the Proposed Project. Due to the limited amount of suitable cold water habitat, the predicted loss of habitat in both absolute volume & duration would be potentially significant without mitigation.â€
Even if the reductions in cold water are not lethal to the fishery, they are detrimental. As stated in the report:
â€œRainbow trout can survive excursions above the 20Â°C thresholds without being lethal for periods over a week. However, there may be impacts to physiological performance such as reduced growth and weakened disease resistance.â€
Any activity that further reduces cold water in the lake will also lessen the

cold-water fisheries that have made Lake Almanor one of the best fishing destinations in California (data in the final draft of the Lake Almanor Water Quality Report, 2020 https://sierrainstitute.us/new/wp-conte ... rt2020.pdf).

The economic effects to local and surrounding rural communities due to revenue & job losses could be devastating. A significant fishing & water sports-oriented economy exist in the local community based on the natural beauty and outstanding cold-water fishery found at Lake Almanor. The proposed temperature requirements threaten this economic base. Add this threat to the economic damage caused by the Dixie Fire Disaster & add the economic effects caused by the announced closure of the California Correctional Center, a significant employer in the area. You have a formula for financial disaster. According to an article in the Sacramento Bee: Rural California could lose thousands of jobs as prisons close. What can the state do? by Jeong Park, 5/18/21:

â€œAccording to the cityâ€™s latest financial statement, the closure of the California Correctional Center scheduled for June 2022 means Susanville could lose more than a quarter of its workforceâ€”jobs that pay upwards of $90,000 in some cases.â€

In conclusion, I strongly urge that the FERC honor & uphold the 4/22/04 settlement agreement filed on behalf of the Project 2105 Licensing Group.

Document Content(s)