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FEDERAL ENERGY
REGULATORY COMMISSIONDaniel Lane
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Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

March 09, 2022

RE: Proposed release of cold water and relicensing of Lake Almanor (Project 2105):

Dear FERC Commissioners:

I am writing to express my concerns that the temperature requirements added to the re-licensing process of the hydro-electric project operated by Pacific Gas and Electric Company (PG&E) at Lake Almanor (the 2105 license) in California's Plumas County will negatively impact on the surrounding communities. The supplemental cold-water withdrawals from Lake Almanor during the heart of summer envisioned in the certification to reduce water temperatures in the North Fork of the Feather River described in Conditions 1(B) and 6 of the water quality certifications are problematic. This will harm the local economy, degrade the local environment and harm local families and wildlife, all of which are dependent upon the lake. Recall that in 2021, this region was devastated by the Dixie Fire, a Presidentially Declared Disaster that torched more than one million acres of timber, thousands of residences, and the entire town of Greenville. This region, the economy of which relies heavily on recreational boaters and anglers, cannot sustain more hardship. Accordingly, I ask for your support of the original 2004 Settlement Agreement, as explained below, and that the license be issued timely to include the water releases agreed upon in the original Agreement.

The process of re-licensing the hydro-electric project operated by PG&E located at Lake Almanor has been difficult. A group of stakeholders (the 2105 group) worked in 2004 to reach a Settlement Agreement which was undone by the addition of a requirement by the CA State Water Resources Control Board (SWCRB) for a reduction in water temperature of three degrees Celsius nine miles downstream in the outflow river. As a result, the project remains unlicensed. This decrease in temperature would theoretically be beneficial to trout in that section of the river. There is little evidence that the temperature decrease could be achieved, or if it would benefit fish populations; however, there is abundant evidence that temperature increases in Lake Almanor will negatively affect water quality and fish populations. 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. From the report:

“The 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 critical dry years.”

Significantly, the report states that:

“Because 2020 was a dry year, oxygen levels dropped to low levels during the summer, similar to what happened during the drought years of 2014 -2016. Also, algal populations, especially the blue green algae, reached bloom proportions.”

The report also states:

“Some species of these (blue green) algae have the ability to produce toxins that are harmful to children and pets.”

The State Water Board’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 beneficial uses and these adverse effects can only be eliminated through intensive mitigation. As stated in the report:

*“As 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, and critical 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 and the Proposed Project. Due to the limited amount of suitable cold water habitat, the predicted loss of habitat in both absolute volume and duration would be potentially **significant without mitigation.**”*

Even if the reductions in cold water are not lethal to the fishery, they are detrimental. As stated in the report:

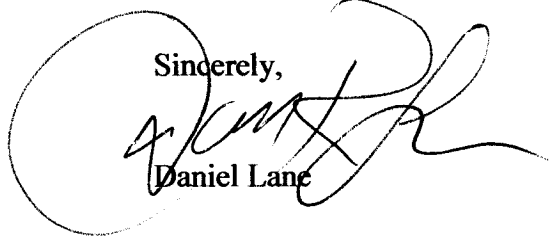
“Rainbow trout can survive excursions above the 20°C threshold without being lethal for periods over a week, however, there may be impacts to physiological performance such as reduced growth and weakened disease resistance.”

Any activity that further reduces cold water in the lake will also reduce 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-content ... rt2020.pdf](https://sierrainstitute.us/new/wp-content/uploads/2020/03/Lake-Almanor-Water-Quality-Report-2020.pdf)).

The economic effects to local and surrounding rural communities due to revenue and job losses could be devastating. A significant fishing and water sports-oriented economy, fueled by visiting boaters and anglers, exists 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...the region cannot take another hit.

In conclusion, I the FERC to honor and uphold the April 22, 2004 Settlement Agreement filed on behalf of the Project 2105 Licensing Group.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Lane', is written over the printed name. The signature is stylized and cursive.

Daniel Lane

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