

ORIGINAL

January 12, 2022

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Rm 1A
Washington, DC 20428

FILED
SECRETARY OF THE
COMMISSION

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FEDERAL ENERGY
REGULATORY COMMISSION

RE: FERC Project 2105, Upper North Fork Feather River Project

Dear Commissioners,

As you are aware, the re-licensing for Project 2105 is still pending after years of study and negotiations. Many issues have been successfully resolved but one significant outstanding issue remains, that being the SWRCB's proposed diversion of cold water from Lake Almanor via a thermal curtain to lower downstream water temperatures.

While this costly and unproven proposal may or may not provide a small incremental, transient reduction in downstream water temperature, it would likely cause significant negative impacts to Lake Almanor water quality and its ecosystem which, in turn, may also ultimately negatively impact downstream ecosystems.

Over the past several years, we have begun to experience significant and potentially toxic algal blooms in Lake Almanor. While the exact cause of these historically unique algal blooms has not been determined, it is believed that warmer water temperatures, possibly the result of drought and/or climate change, are likely a factor. The SWRCB proposed cold water diversion would further increase Lake Almanor water temperatures and would likely exacerbate the algal bloom situation. This would not only have a significant negative impact on Lake Almanor water quality, it would also increase the likelihood that significant portions of the potentially toxic algal blooms would pass through the Lake and into downstream waters which could cause significant unintended negative impacts to the very ecosystems that the SWRCB is attempting to improve.

In addition to the potential for increased algal blooms and unintended negative downstream impacts, the raising of water temperatures in Lake Almanor would also likely devastate the Lake's own ecosystem. Lake Almanor is currently considered a prime, cold-water fishery and a lake that is heavily utilized for swimming, skiing and other body contact activities attracting many visitors and providing a large economic benefit to the otherwise relatively depressed local economy. Raising Lake Almanor water temperatures would greatly degrade the Lake's water quality and fisheries ecosystem and result in a huge negative impact on the area's economy.

In closing, I want to say that I certainly understand the well-intended desire to improve the downstream ecosystem by lowering downstream water temperatures. But we also believe that the SWRCB's currently proposed thermal curtain requirement could result in unintended negative downstream water quality impacts in the form of potentially toxic algal discharges which might more than offset any improvement gained via lowered water temperatures. The proposed thermal curtain requirement would likely also cause great harm to the Lake Almanor ecosystem and its prime coldwater fishery which in turn, would also likely have a significant negative impact on the local economy. In looking at the full picture and after considering the relatively small potential benefits and corresponding offsetting negative impacts, we are requesting that FERC reject the proposed thermal curtain alternative for Lake Almanor.

Sincerely,



Maryann Koch


David Koch

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