

March 14, 2022

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
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Washington, DC 20428

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SECRETARY OF THE
COMMISSION

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FEDERAL ENERGY
REGULATORY COMMISSION

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

Dear Commissioners,

My wife and I have owned a home over 40 years at 315 Law Drive on the west shore of Lake Almanor and the proposed diversion of cold water from the lake would have significant impact on us directly, the environment and the community around Lake Almanor. The benefits of the cold-water diversion are outweighed by the damage done to the Lake Almanor ecosystem. Given Lake Almanor's large surface area and shallow depth, the lake water is already relatively warm in the summer. Further diversion will make the problem worse.

Especially harmful will be the supplemental cold-water withdrawals from Lake Almanor envisioned by the water quality certification during the 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 and degrade the local environment and harm local families and local wildlife, all of which are dependent on the lake. These impacts will be especially onerous considering they will be added onto the recent devastation caused by the Dixie Fire, a Presidentially Declared Disaster that burned over one million acres of timber locally.

The process of re-licensing the hydro-electric project operated by Pacific Gas and Electric Company has been unduly difficult. A collaborative group of stakeholders (2105 group) worked diligently in 2004 to come to a Settlement Agreement which was thrown into chaos by the CA State Water Resources Control Board (SWRCB). This caused the license to not be issued. During your review of the Project 2105 Licensing, we 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:

"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 is 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 potentially significant without mitigation."

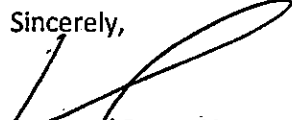
Even if the reductions in cold water are not lethal to the fishery, they are detrimental. As stated in the report:

"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."

We are all fearful that an environment that supports massive toxic algae blooms will be harmful and disruptive to our healthy fish habitat. The majority of the fish population in Lake Almanor is made up of trout, both Rainbow and German Brown. These fish require cold water to survive. In the summer, when the surface temperature of the water approaches seventy degrees, these fish will only be found at the bottom of the deepest portions of the lake, the same areas where the proposed cold water pumping will occur. The act of raising the water temperature of the lake by diverting the coldest water downstream would not only directly harm the existing trout population but certainly help to exacerbate the toxic algae problem, thereby jeopardizing future wildlife populations, including the Bald Eagle, the Western Osprey, and otters, all of which feed on the trout.

The Feather River Watershed has just suffered a devastating natural disaster that will have a profound negative impact for decades to come. Please do not make a decision that will magnify the damage to our ecosystem. Please, please uphold the original settlement agreement. This lake, this fish habitat, and this community, cannot afford to relinquish its coldest water.

Sincerely,



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