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2022 FEB 23 P 1:54

FEDERAL ENERGY
REGULATORY COMMISSION

July 20, 2021

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E. Room 1A
Washington, D.C. 20426

P-2105

Dear Kimberly Bose,

As a resident of Plumas County, CA, I am writing to express my deep concerns about Project 2105 and the devastating negative impact it will have on Lake Almanor, my community, and the environment.

Project 2105 proposes to release cold water from Lake Almanor, drawing down the lake beyond current releases, to try to reduce water temperatures in the lower Feather River basin, to try to improve fish habitat downstream. Three alternatives are proposed: 1) installing a thermal curtain, 2) stand-alone supplemental flows (surge water releases), and 3) a combination of both practices. Each practice will have detrimental impacts to the quality of Lake Almanor, resulting in public health, environmental, and economic damage, negatively impacting the health and wellness of our rural community.

A great infraction in Project 2105 is the use of 20-40-year-old data in modeling impacts of cold water conveyance from lake Almanor in the decision making processes. Currently, impacts of cold water conveyance from Lake Almanor use hydrological and meteorological data from the 19-year period of 1984 through 2002¹. With increased drought severity, rising temperatures, decreased snowpack, and far less water runoff in the mountains, these old data way underestimate potential negative impacts on Lake Almanor and any benefits to downstream waters, due to climate change. In this day and age, decreasing water temperatures downstream are highly unlikely as there just isn't enough cold water storage capacity for Lake Almanor to meet the demands of cooling a river in a warming climate. It's a shallow lake, mostly about 30-ft deep, with the exception of the old river channel that might reach depths of 90-ft. As a scientist with the University of California and farmer who depends on good data to make decisions, I find the use of old data troubling and unconscionable.

The cost to the lake from temperature increases from implementing any of the alternative practices would be catastrophic. Warming of the lake will cause a collapse of our cold-water fisheries, one of the premiere fishing areas in California that generates income for our rural community. We will also have increased toxic algal blooms as well as increased issues with swimmer's itch (aka duck itch), a parasite that thrives in warmer stagnant waters, that burrows into skin, causing rashes. These issues are happening now, in greater severity due to our disastrous drought; children and pets are at particular risk to toxic algae and swimmer's itch with wading in shallow waters. Families won't want to come to our lake for recreating with increased water quality issues, adding to economic losses for our community.

There are also negative impacts to wildlife and especially grebes, with Lake Almanor home to one of the largest nesting colonies of these birds. PG&E has been directed to develop

and implement a Grebe Management Plan in consultation with stakeholders (US and CA Fish and Wildlife, Plumas Audubon Society, and State Water Board staff). The Grebe Management Plan will require PG&E to identify any adverse Project impacts on Grebe nesting and propose and implement reasonable measures to avoid or reduce identified adverse impacts. Further lake drawdown will negatively impact these birds. Grebes bring in revenue to our area through the annual Lake Almanor Grebe festival.

The Clean Water Act states that one cannot adversely affect the beneficial uses of waters. The existing beneficial uses for Lake Almanor identified in California's Central Valley Regional Water Quality Plan (State Water Resources Control Board, SWRCB) include hydropower generation, contact recreation, warm and cold freshwater habitat, warm spawning habitat, and wildlife habitat. Old models have shown the negative impacts of cold water conveyance from Lake Almanor, with increasing lake water temperatures. This will only be exacerbated with our warming temperatures and decreased snowpack that feeds our lake.

PG&E as well as the US Forest Service, CA Dept Fish and Wildlife, Plumas County, Sportfishing Protection Alliance, Anglers Committee, and other stakeholders held extensive negotiations and developed a settlement agreement in 2004 for Lake Almanor. That settlement provided more cold water flows down the river while maintaining enough cold water and suitable lake levels at Lake Almanor so that its recreational benefits would be preserved. This settlement agreement should be honored because it was developed by local communities and accepted and signed by all parties.

My community depends on tourism from families that come to Lake Almanor for recreation including fishing, swimming, and boating. Taking cold water from the lake will increase the temperature of our waters negatively impacting fisheries, swimming, and recreation, affecting the livelihood of our rural community. We're already hit hard by drought and fires (especially the current Dixie Fire) affecting tourism; we don't need additional issues of poor water quality driving tourism away. Our lake is our economic lifeline to maintaining a prosperous and healthy community.

I request that you reject the thermal curtain and or increased release alternatives and ensure protection of Lake Almanor and our surrounding community. I am OPPOSED to Alternatives one & two of SWRCB's 2014 draft, and now Alternative three of SWRCB's 2020 draft. All three of these alternatives are unreasonable and reckless as they will negatively impact our lake and community. I strongly urge the State Water Board to only consider 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. This won't work in our warming climate. New data are needed for predictive models; these will show removing cold water from the lake will ruin our lake and push tourism away, negatively affecting the health and wellness of our community. Thank you for your time and attention to this matter.

Sincerely,

Rachael Long

¹SWRCB 2020. Pacific Gas and Electric Company Upper North Fork Feather Hydroelectric Project Federal Energy Regulatory Commission Project NO. 2105, Pg. 13, Water Quality Certification for Federal Permit or License.

cc:

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