

Honorable Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

December 27, 2004

Re: Draft Environmental Impact Statement and Notice of Settlement Agreement (FERC No. 2105) for the Upper North Fork Feather River Project, Plumas County California

Dear Secretary Salas:

Plumas County Flood Control and Water Conservation District wishes to comment on comments provided in response to the Draft EIS for Project 2105.

Unites States Dept. of the Interior

Plumas County is in full support of the Settlement Agreement, and is generally not in favor of an amended flow schedule down the Seneca reach. However, due to the ramifications of the implementation of the Prattville Intake modifications, Plumas County has proposed an alternative that reflects NOAA fisheries desire to manage for Adult salmonids in Seneca and beyond, that would require increased flows. Changes to the Lake Level Agreement would not be acceptable to Plumas County, and it is worth noting that higher lake levels preserve the maximum amount of cold water available to lake trout and stream trout at the most critical time of year.

Plumas is opposed to the re-introduction of spring run Chinook salmon into the Upper North Fork Feather River specifically because the fish spawning, rearing and holding areas are inadequate under current and proposed conditions. The genetic uncertainty of the strain to be introduced and the introduction of disease into the watershed are of major concern. Should this course of action be pursued, Plumas has offered an alternative site in waters unaffected by project 2105. Also, Plumas County has not been consulted on the ramifications of the fish passage operations is a severe oversight.

Requiring pulse flows in dry and critically dry years is inconsistent with a natural hydrograph. Separate from the temperature issue, Plumas County does not agree that these flows are necessary and is confident the proposed Recreational Flow schedule for dry and critically dry years is sufficient to promote diversity in the reaches downstream from Belden.

Plumas County is in support of a water temperature management plan to address the watershed approach in stream course health.

United State Fish and Wildlife Service

In the absence of a watershed approach to relicensing, Plumas rejects the Fish and Wildlife Services recommendation to connect the licenses with a trap and haul project between projects for salmon in the North Fork Feather River. If re-introduction is to occur, Plumas proposes an alternative site that will not impact logging, power production or recreation. Plumas needs to be consulted on any of these proposals.

State Water Resources Control Board

Plumas agrees with SWRCB recommendations to include alternatives analysis to temperature reductions downstream, in addition to solutions to depleted dissolved oxygen levels in Lake Almanor and Butt Valley Reservoir.

United States Forest Service

Plumas would also like to see the final EIS reflect the language in the Settlement Agreement for purposes of congruity with the 4(e) conditions.

Maidu Cultural Development Group et al

Plumas concurs with the various Recognized and Unrecognized Maidu Tribal groups that it is not for PG&E and the FERC to determine the significance of sites, and therefore the level of protection afforded them. We encourage PG&E to fully implement section 106 and consider a cultural resource center on deeded land or through special use permit from the Forest Service.

Thank you for this opportunity to comment.

Sincerely,

Tom Hunter, Director of Public Works
1834 E. Main St.
Quincy, CA 95971

CC: Service List

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