

FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, DC 20426

March 22, 2005

OFFICE OF ENERGY PROJECTS

Project No. 2105-089-California  
Upper North Fork Feather River  
Hydroelectric Project  
Pacific Gas and Electric Company

**Reference: Summary of 10(j) Meeting**

To the Party Addressed:

Enclosed is a summary of the Section 10(j) teleconference for the Upper North Fork Feather River Hydroelectric Project (Project No. 2105-089), held by Commission staff on February 3, 2005. I'm distributing copies of this summary to all parties and affected resource agencies, as required under section 4.34(e)(5) of the Commission's regulations.

Sincerely,

Timothy J. Welch  
Chief  
Hydro West Group 2

Enclosures:

Summary of 10(j) meeting (Enclosure A)  
List of participants (Enclosure B)

cc: Public Files  
Service List



Enclosure A

## **10(j) MEETING SUMMARY**

Upper North Fork Feather River Hydroelectric Project  
Project No. 2105-089  
California

On February 3, 2005, from 1:00 p.m. to 3:30 p.m. EST, representatives from the Federal Energy Regulatory Commission (Commission) and the U.S. Department of Interior, Fish and Wildlife Service (Interior) participated in a Section 10(j) teleconference. Representatives from the California Department of Fish and Game (CDFG), the Forest Service (FS), the State Water Resources Control Board (SWRCB), Plumas County and Pacific Gas and Electric Company (PG&E) also participated.

After introductions, we (Commission staff) described the 10(j) process and stated that the purpose of the meeting was to attempt to resolve the apparent inconsistencies between Interior's Section 10(j) recommendations and Sections 313(b), 4(e), and 10(a) of the Federal Power Act (FPA). Recommendations for which a preliminary determination of inconsistency were made included: (1) instream flow schedules, (2) pulse flows, (3) lower Butt Creek pulse flow plan, (4) water temperature management plan, (5) geomorphological monitoring plan, (6) coarse sediment management plan, and (7) wildlife management plan. These inconsistencies were detailed in the Draft Environmental Impact Statement (DEIS), issued September 17, 2004. We also discussed Interior's concerns with two of their recommendations that were consistent with the FPA and adopted in the DEIS: (1) reservoir operations; and (2) vegetation management plan. We also discussed a new recommendation made by Interior in a letter filed with the Commission on November 1, 2004, concerning test river recreational flows. Interior provided an electronic mailing of its discussion outline to the Commission, which it subsequently filed on March 14, 2005 (eLibrary Accession No. 200502160016).

The following summarizes the meeting discussions.

### **Recommendations for which a preliminary determination of inconsistency was made**

1. Instream flow schedules (Interior 10(j) recommendation no. 1)

Inconsistency: *Interior recommended higher minimum instream flows for the Belden and Seneca bypassed reaches than staff's alternative in the DEIS. Interior does not agree that the Settlement Agreement (SA) flows as recommended would adequately protect, mitigate, and enhance aquatic resources in the bypassed reaches. A comparison of the flows recommended in the SA and by Interior is presented below:*

***Recommended minimum flow releases from Canyon dam (Seneca reach).***

Water Year	Proposed By	Month											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Critically dry	SA	75	75	90	90	90	80	75	60	60	60	60	70
	Interior	90	90	90	90	90	90	60	60	60	60	60	60
Dry	SA	90	100	110	110	110	110	80	70	60	60	60	75
	Interior	90	100	110	110	110	110	80	70	60	60	60	75
Normal	SA	90	100	125	125	125	125	90	80	60	60	60	75
	Interior	90	100	150	150	150	125	90	75	75	75	75	75
Wet	SA	90	100	125	150	150	150	95	80	60	60	60	75
	Interior	105	130	170	170	170	150	95	85	85	85	85	90

***Recommended minimum flow releases from Belden dam (Belden reach).***

Water Year	Proposed By	Month											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Critically dry	SA	105	130	170	180	185	90	80	75	75	75	85	90
	Interior	130	130	150	150	150	130	100	100	100	100	100	100
Dry	SA	135	140	175	195	195	160	130	110	100	100	110	115
	Interior	135	140	175	185	195	160	130	110	110	110	110	120
Normal	SA	140	140	175	225	225	225	175	140	140	120	120	120
	Interior	140	140	175	225	225	225	170	140	120	120	120	120
Wet	SA	140	140	180	235	235	225	175	140	140	120	120	120
	Interior	140	140	225	250	250	250	175	140	140	130	130	130

*We made a preliminary determination that Interior's recommendation was inconsistent with the comprehensive planning standard of Section 10(a) of the FPA, including the equal consideration provision of Section 4(e) of the FPA because the benefits to the biological and physical constituents of the riverine system were not substantially enhanced when compared to the flows presented in the SA and the costs were high.*

During the teleconference, Interior described the likely ecologic, geomorphic, and sedimentologic benefits they believed would occur due to increased flow to the bypassed reaches. According to Interior, these benefits primarily consist of increased habitat for adult rainbow trout, increased movement of substrates, and activation of floodplain surfaces. It is Interior's opinion that these characteristics will be substantially enhanced by the implementation of their flow recommendations as compared to our recommended alternative.

We mentioned that benefits to the aquatic system would occur as a result of either proposed flow regime, and that it was questionable as to whether the increase in water as recommended by Interior would result in a substantial increase in overall aquatic benefit. Flows recommended in the SA would more than double the current amount of habitat available for adult trout during the spring and high-flow events of wet/normal years, thus providing a substantial benefit to the trout fishery. Interior identified it believes its alternative would provide significantly greater benefits for adult rainbow trout during late summer and early fall, and provides increased benefits commensurate with variation in water supply across year types. We expressed concern that the incremental increase in weighted usable area for adult rainbow trout likely comes at the expense of habitat for juvenile rainbow trout and macroinvertebrate community diversity. Interior stated it believes the reduction in juvenile weighted usable area is minor (~1%), and that the IFIM completed for the relicensing was biased to low flows as it did not consider adjacent velocity criteria as recommended to the applicant prior to their conducting the IFIM study. Interior further stated that the applicability of the macroinvertebrate criteria to the Upper North Fork of the Feather River is questionable as they were derived from another system. We stated that the additional annual economic cost of \$469,000 that would be incurred by PG&E as a result of Interior's flow recommendation (above the cost of releasing the SA flows) would need to be balanced with all of the benefits at the project. This inconsistency was not resolved, but we agreed to take Interior's comments into consideration in preparing our final EIS (FEIS).

## 2. Pulse flows (Interior 10(j) recommendation no. 2)

***Inconsistency:*** *Interior contends that their recommended pulse flows would provide additional benefits to the ecological, geomorphic, and sedimentological processes in the bypassed reaches, as compared to those flows recommended in our alternative. Interior has also expressed concern over the lack of prescribed pulse flows in water years classified as Dry, as recommended in the SA.*

*We made a preliminary determination that Interior's recommendation was inconsistent with the comprehensive planning standard of Section 10(a) of the FPA, including the equal consideration provision of Section 4(e) of the FPA because the benefits to the biological and physical constituents of the riverine system were not substantially enhanced as compared to the benefits associated with the flow regime as described in the Settlement Agreement, and the cost was significant. A comparison of the recommendations is presented below:*

### ***Recommended pulse flow releases for the Seneca and Belden reaches***

<b>Water Year Type</b>	<b>Recommending Party</b>	<b>Pulse Flow Release</b>
Wet	SA, FS, CDFG	One release per month in January (675 cfs), February (1,200 cfs), and March (1,200 cfs)

Water Year Type	Recommending Party	Pulse Flow Release
Normal	Interior	One release per month in January, February, and March of 1,500 cfs. (2,200 acre-feet volume <sup>a</sup> )
	SA, FS, CDFG	One release per month in January (675 cfs), February (1,000 cfs), and March (1,000 cfs)
Dry	Interior	One release per month in January, February, and March of 1,200 cfs. (1,800 acre-feet volume <sup>a</sup> )
	SA, FS, CDFG	No pulse flows
Critically Dry	Interior	One release in March of 700 cfs, only if no other pulse was released in January or February. (1,000 acre-feet volume <sup>a</sup> )
	SA, FS, CDFG	No pulse flows
	Interior	No pulse flows

Interior's recommended pulse flows substantially increase the amount of water released into the bypassed reaches for the maintenance of ecological and aquatic processes. Interior expressed their belief that their recommended flow regime would result in improvements to the aquatic system as compared to those flows recommended by the SA and the DEIS. Interior expressed its desire to see a pulse flow of some magnitude in dry years, especially since the DEIS and SA allow for recreation flows in dry and critically dry years. Interior further explained that, under their recommendation, in accordance with the SA, no pulse flow would occur if water temperature exceeded 10°C for two consecutive days in March and requested that we take that into consideration in our analysis. Interior is concerned with the potential for consecutive years without any pulse flows in project reaches and cautioned us that if insufficient frequency of spring pulse flow is allowed for benefits to the ecosystem, there may be potential for a negative impact to organisms and ecosystem processes that rely on such pulse flows. This inconsistency was not resolved, but we agreed to take Interior's concerns into consideration in preparing our FEIS.

### 3. Lower Butt Creek pulse flow plan (Interior 10(j) recommendation no. 3)

**Inconsistency:** *Interior has recommended that PG&E implement a one-year test flow plan within 5 years of license issuance. The test pulse flow plan would include measures to assess the frequency, magnitude, and duration of high flows that exist in this reach, and would include actions such as loosening of woody debris and excavation of excess vegetation. Components of the test flow study would also include pre- and post-*

*monitoring of mesohabitat, surveys to assess LWD and vegetation density, substrate characterization, longitudinal and cross-sectional profiling, and tracer gravel monitoring.*

*We made a preliminary determination that Interior's recommendation was inconsistent with the substantial evidence standard of section 313(b) and the comprehensive planning standard of Section 10(a) of the FPA, including the equal consideration provision of Section 4(e) of the FPA because lower Butt Creek currently shows no signs of impairment or a need for pulse flows, and implementation of pulse flows may result in adverse effects. The SA for this project calls for development of a plan to monitor and assess the quality of habitat in lower Butt Creek. If the results of studies conducted under this plan indicate that habitat quality in this reach has become degraded, a pulse flow plan would be developed in consultation with Interior, CDFG, SWRCB, and the FS.*

During the teleconference, Interior agreed that the actions called for in the SA would be acceptable, as long as adaptive management remains a viable and attainable component of the proposal. Interior expressed concern with the wording in the SA and DEIS whereby pulse flows would not be released until the licensee concluded that habitat quality had degraded and that pulse flows would provide a significant benefit. Interior preferred the wording “has degraded or could be enhanced.” PG&E described the problems associated with providing a pulse flows; Butt Valley dam has no low level outlet, and at present the only way to release pulse flows would be through the spillway. Alternatively, a siphon system could be designed, but with 34 feet of head, PG&E explained that this would be an engineering challenge and that the cost of such a system is unknown. We agreed to calculate an estimated cost for a siphon system and balance that with the expected benefits. We consider this inconsistency partially resolved with the suggested wording change. However, at present, the feasibility and costs associated with releasing pulse flows, should they be needed, at the dam remain unknown.

#### 4. Water temperature management plan (Interior 10(j) recommendation no. 5)

*Inconsistency: Interior recommended that PG&E develop a water temperature management plan, fund and construct a modified Prattville intake, and fund other structure(s) to satisfy appropriate water temperature criteria beyond those provided by the Coldwater Habitat and Fishery Mitigation and Enhancement Fund under the relicensing Settlement Agreement for the Rock Creek-Cresta Project (FERC No. 1962). Interior recommended that the water temperature management plan include feasibility and effectiveness assessments of modifying the Prattville intake, modifying the Butt Valley structures, seasonal use of the upper and lower Canyon Dam intake gates, and implementation of a fence device at the Prattville intake with the goal of providing cooler water to reaches downstream of the Project. Interior also recommended that PG&E*

*develop appropriate temperature criteria by season, reach, and outlet location to avoid unintended adverse effects of sublethal stress on aquatic biota, and incorporate these criteria into the water temperature management plan.*

*We made a preliminary determination that Interior's recommendation was inconsistent with the substantial evidence standard of section 313(b) and the comprehensive planning standard of Section 10(a) of the FPA, including the equal consideration provision of Section 4(e) of the FPA*

We noted that on December 17, 2004, we issued an Additional Information Request (AIR) to PG&E in order to obtain reports on the studies it has conducted to investigate the feasibility of providing cooler water to the reaches downstream of the Project. PG&E stated that it has evaluated 23 alternatives to accomplish this goal, and filed several reports in its January 13, 2005 response to the AIR. PG&E issued a news release in November 2004 stating that it does not currently anticipate recommending a floating curtain for the Prattville intake. PG&E is continuing to evaluate alternatives to provide cooler water to the reaches downstream of the Project with the collaborative group. Meeting dates are scheduled for at least the next three months, but there is no schedule for reaching a final decision.

Interior stated that neither the Rock Creek-Cresta Project Settlement Agreement nor the Rock Creek-Cresta license order require PG&E to evaluate temperature effects in the Upper North Fork Feather River Project stream reaches. It also noted that evaluation of aquatic resource benefits should not be solely limited to attainment of 20°C, but that additional benefits occur as water temperatures are lowered from 20°C to 15°C. Interior indicated that it would like to have consistent low stream temperatures during late summer. We indicated that monitoring of water temperature in project reaches to determine changes resulting from the new flow regime would be beneficial and should be conducted. We noted that the Commission does not have authority to set water temperature standards, and the SWRCB agreed. We indicated that we are still evaluating the information provided by PG&E in January in response to the December 17, 2004 AIR. We consider this inconsistency partially resolved, pending analysis of the new information.

5. Geomorphological monitoring plan (Interior 10(j) recommendation no. 6)

Inconsistency: *Interior recommended that PG&E prepare and implement a geomorphological monitoring plan to evaluate alterations to stream morphology as a result of final flow recommendations. The geomorphological monitoring plan as recommended by Interior included an assessment of stream-bed cross sections, longitudinal profiles, and changes to overall channel dynamics in the bypassed reaches in years 1, 5, 10, and 20.*

*We made a preliminary determination that Interior's recommendation was inconsistent with the substantial evidence standard of section 313(b) and the*

*comprehensive planning standard of Section 10(a) of the FPA, including the equal consideration provision of Section 4(e) of the FPA. We felt this level of intensive examination was not warranted since large-scale channel maintenance events were not likely to be triggered by the scheduled flow releases. The proposal included in the SA included a gravel monitoring plan that would allow for an evaluation of the movement, abundance, composition, and distribution of the substrates likely to move during pulse flows (fines through small cobbles). We consider this gravel monitoring plan to be an appropriate means for monitoring the changes that are likely to occur in stream dynamics and character. An adaptive management philosophy is built into the gravel monitoring plan and, if after review of the data by the appropriate agencies (FS, FWS, CDFG, SWRCB), it is determined that pulse flows are not effectively entraining or redistributing gravel and cobble substrates, contingency actions may be implemented to correct any unsatisfactory conditions. Modifications to the pulse flow regime would be subject to the conditions as described in Section 3b (page 21) of the SA.*

During the teleconference and in letters filed with the Commission on October 27, 2004 and November 1, 2004, Interior indicated that while they prefer their original recommendation, as an alternative to it they would be satisfied with geomorphological monitoring occurring once during the license term (approximately mid-term) instead of four times (in years 1, 5, 10, and 20) as they originally recommended. However, Interior would like to see standard monitoring conducted including longitudinal profiling and mesohabitat measurements, as well as detection of changes due to modified minimum flows or pulse flows, changes resulting from vegetation encroachment (or lack of) and cumulative effects due to the project or other large scale events. We agreed that Interior's current alternative to their original recommendation provides a reasonable compromise and we will modify our FEIS accordingly. We consider this inconsistency to be resolved.

#### 6. Coarse sediment management plan (Interior recommendation no. 8)

Inconsistency: *Interior recommended that PG&E develop and implement a coarse sediment management plan for the bypassed reaches of the project as a means to monitor coarse sediment distribution and movement on a long-term basis. The purpose of this plan would be to: 1) monitor spawning gravel quantity and quality, 2) develop contingency actions for improving the quality and availability of gravels, 3) develop "triggers" for the implementation of contingency actions and, 4) conduct a special study of the effects of pulse flows on coarse sediment movement and distribution.*

*We made a preliminary determination that Interior's recommendation was inconsistent with the substantial evidence standard of section 313(b) and the comprehensive planning standard of Section 10(a) of the FPA, including the equal consideration provision of Section 4(e) of the FPA. PG&E proposed implementing the gravel monitoring plan included in the SA which includes an evaluation of the movement, abundance, composition, and distribution of the substrates likely to move during pulse*

*flows (fines through small cobbles). We consider the gravel monitoring plan to be an acceptable means of monitoring the changes that are likely to occur in stream dynamics and character. As mentioned above, an adaptive management philosophy is built in to the gravel monitoring plan and, if after review of the data by the appropriate agencies (FS, FWS, CDFG, SWRCB), it is determined that pulse flows are not effectively entraining or redistributing gravel and cobble substrates, contingency actions may be implemented to correct any unsatisfactory conditions.*

During the teleconference Interior indicated that they would be agreeable to the gravel monitoring plan as recommended in the DEIS if the contingency actions (e.g., gravel supplementation) described in the SA are more clearly defined in the FEIS. We agreed to do this and consider this inconsistency resolved.

#### 7. Wildlife management plan (Interior 10(j) recommendation no. 21)

Inconsistency: *Interior recommended a plan for monitoring of wildlife that may be affected by operational changes in flow, lake level, or other recommended measures such as vegetation management.*

*We found Interior's recommendation to be inconsistent with the substantial evidence standard of section 313(b) and the comprehensive planning standard of Section 10(a) of the FPA, including the equal consideration provision of Section 4(e) of the FPA, but noted that components of their recommended plan are incorporated into various other measures/plans that we have recommended.*

In their letter filed with the Commission on November 1, 2004, Interior revised their initial recommendation to wildlife monitoring focusing on changes in habitat types and avian surveys for PG&E-owned lands as specified by the FS in its preliminary Section 4(e) condition no. 37. During the teleconference, Interior further refined their recommendation to a more focused request for wildlife studies specific to the causeway area (between Last Chance Creek Campground and the Chester Airport). Interior explained that this area is sensitive to water levels and under the new license water levels will be slightly higher and less variable. The causeway area is important for wading birds and waterbirds, and Interior believes a focused study here would be appropriate. Interior points out that this area is approximately the same area specified by the FS in its final 4(e) recommendation no. 31: “lands owned by the licensee on the shoreline of Lake Almanor from Last Chance Campground westward to approximately the northern edge of the flood control channel south of the Chester Airport.” Interior cited examples of potential appropriate studies, focusing on changes in habitat types and use including, but not limited to, vegetation cover-type mapping and avian surveys performed during three year-types (wet, normal, and dry/critical dry).

PG&E explained that the project has been operating at the same water levels (which are consistent with the SA) for the past five years and does not think the water level regime will

markedly change post-licensing. When asked about the value of this monitoring, Interior responded that it would establish relationships of water level to wildlife habitat and use, and may assist adaptive management of water level outside of the operating target dates (after Labor Day). Although the response of individual resources would be monitored in a number of resource-specific plans, as provided in the SA, we believe it would be beneficial to have a broader plan to guide the interpretation of monitoring results and consideration of potential effects on all resources, if any measures are adjusted via adaptive management. We recommended in the DEIS developing an adaptive management plan that addresses the results of all monitoring and special studies conducted on various resources, including wildlife species and their habitat. We agreed that the wildlife management plan should include the additional monitoring recommended by Interior and that the need for future actions based on the results of studies would best be addressed through the adaptive management plan. We consider this inconsistency resolved

### **Recommendations adopted in the DEIS**

#### 1. Reservoir operations (Interior 10(j) recommendation no. 4)

*Issue: In addition to addressing Lake Almanor minimum surface water elevations, Interior's 10(j) recommendation no. 4 also recommended that PG&E provide Interior, the FS, CDFG, and SWRCB with an analysis of unmanaged spills during trout spawning season and also develop a plan in consultation with these agencies for modified operations to reduce or eliminate adverse effects*

*We found no inconsistency between the agency's 10(j) recommendation and the FPA, and recommended that PG&E take such reasonable actions as may be prudent to prevent the water surface elevation in Lake Almanor from exceeding 4,494 feet. In its letter to the Commission filed November 1, 2004, Interior asked the Commission to specifically address this recommendation and asked if it was included by the FS in its preliminary Section 4(e) condition no. 30.*

In preliminary Section 4(e) condition 30, the FS specified that PG&E develop a notification and minimization of emergency and planned outage spill plan for the purpose of minimizing the negative ecological effects of uncontrolled high flows into the project bypassed reaches resulting from emergency and planned hydropower facilities maintenance outages. In its final Section 4(e) condition 30, which reflects SA section 3, items 6, 7, and 9, the FS provides for the temporary modifications of the minimum water surface elevation and emergencies and recommends that PG&E take such reasonable actions as may be prudent to prevent the water surface elevation in Lake Almanor from exceeding 4,494 feet.

During the teleconference, Interior expressed its concern over the timing of spills and the effects on the fishery. Specifically, Interior is concerned with the potential risks to fish and

wildlife during emergency spill events and would like to see risk situations identified. Interior would like to reduce the number of emergency spill events in order to minimize the risks to fish and wildlife. PG&E pointed out that historically there has never been a spill at Lake Almanor but that the spillway is available if it is necessary. It was pointed out that the high flows identified by Interior were the result of the use of the Canyon dam outlet tower during the seismic remediation of the Butt Valley reservoir dam, or during extreme runoff events, such as the January 1997 flood. PG&E also indicated that it is not in their economic interest to spill or to release high flows to the NFFR through the Canyon dam outlet tower and that they are confident in their ability to maintain the Lake Almanor water surface levels specified in the SA. We discussed how item 7 of section 3 of the SA allows for emergency releases. Interior stated that it did not want to impede public safety and realized that on some occasions unplanned releases would be necessary. With this information, all parties agreed that the existing measures are adequate, so we consider this issue to be resolved.

## 2. Vegetation management plan (Interior 10(j) recommendation no. 7)

*Issue: Interior recommended a plan for monitoring long-term changes, enhancing channel processes through manipulation, and minimizing maintenance impacts to riparian habitat*

*We found no inconsistency between Interior's 10(j) recommendation and the FPA, and recommended that the Commission adopt this measure. However, Interior is concerned because our recommendation did not specifically include a pilot test for encroached vegetation. Interior recommends an additional test measure to control excess encroached vegetation for the purpose of enhancing riparian and riverine habitat. Interior believes that PG&E's proposed bramble control measure only addresses a need for recreation access and not habitat.*

During the teleconference Interior proposed an approach to test vegetation management in the riparian corridor with a pilot plan to monitor four modest-size sites; two for noxious weed/native replanting, and two specifically designed to create low velocity river edge habitat through such techniques as recontouring and/or vegetation thinning or removal. The FS pointed out similar objectives between the need for weed (bramble) control in the vegetation plan and in their final 4(e) condition no. 46, which recommends an invasive weed management plan. After discussion, the FS agreed that their condition is restricted to project facilities and roads and does not apply to management of vegetation within the riparian corridor or manipulation of the active channel. When asked if it had considered specific sites for its proposal, Interior stated that small mid-channel bars, or portions of the study sites already characterized in the license application should be considered as candidates and they would like to see a specific proposal addressing channel restoration in the Belden reach. The FS offered to work with Interior to fully develop this proposal, including locations of possible test sites.

The SA includes an element of adaptive management which would address channel enhancement through gravel monitoring with provisions for future pulse flow adjustments. We asked Interior if they had calculated an estimated cost of implementing their requested encroached vegetation monitoring. Interior responded it had not calculated such a cost estimate and that this was not a specific project, but a concept which had been successfully applied in numerous stream restorations throughout the country. We asked Interior to file any specific information they have related to their proposal that we may consider in preparing our FEIS. We consider the specifics of this issue to be unresolved at this point, but expect that, during agency consultation associated with development of the Vegetation Management Plan, the appropriate components of needed studies would be identified.

### **New recommendation**

#### 1. Test river recreational flows (Interior 10(j) recommendation no. 22)

*In a letter filed with the Commission on November 1, 2004, Interior recommends implementing a six year waiting period following license issuance before the release of flows for recreational purposes. Interior's primary concern is to allow the biological communities in the bypassed reaches to respond to the new flow regime. Interior also expressed concern that biological, geomorphic, and sedimentological monitoring of responses to the new flow regime would likely be confounded by the release of recreational pulse flows in the initial five years after license issuance.*

We asked Interior if they knew the National Park Service's (NPS) opinion on this issue but they did not. PG&E stated that the boating groups are opposed to a delay in implementing recreational flows. Interior stressed that they are not opposed to completing the recreational flow study and knows that the NPS has supported whitewater recreation flows at other projects. Interior believes temporarily delaying implementation of the recreational flow study, as proposed, would only result in a small reduction in recreational benefits while allowing the biotic community to adjust to the revised instream flow regime. They believe this delay would allow effects of the revised instream flows to be distinguished from the effects of summer recreational flows. PG&E stated it did not believe that it would be possible to discern the response of the biotic community to the instream flow regime from natural variation. Interior believes the new flow regime would result in significant responses and potential changes to the biotic community, and emphasized the need to exercise caution in light of studies showing recreational flow disruption of macroinvertebrates, including those for the Rock Creek-Cresta license (#1962). We agreed with Interior's recommendation that postponing recreational flows would allow a better assessment of the effects of the new license conditions, but stated that we must balance those benefits with the costs to the boating community. We consider this inconsistency to be currently unresolved, pending that analysis.

Enclosure B

**LIST OF MEETING PARTICIPANTS**

<b><u>Name</u></b>	<b><u>Organization</u></b>
Mike Hoover	U.S. Fish and Wildlife Service
Deborah Giglio	U.S. Fish and Wildlife Service
Steve Schoenberg	U.S. Fish and Wildlife Service
Doug Weinrich	U.S. Fish and Wildlife Service
Kerry O'Hara	U.S. Department of Interior, Solicitor's Office
Bob Hawkins	U.S. Forest Service
Mary Lisa Lynch	California Department of Fish and Game
Jim Canaday	State Water Resources Control Board
Matt Myers	State Water Resources Control Board
Kristi Goodman	Plumas County
Wayne Dyok	MWH (for Plumas County)
John Mudre	Federal Energy Regulatory Commission
Alan Mitchnick	Federal Energy Regulatory Commission
Frankie Green	The Louis Berger Group (for FERC)
Brian Mattax	The Louis Berger Group (for FERC)
Alynda Foreman	The Louis Berger Group (for FERC)
Sue Davis	The Louis Berger Group (for FERC)
Scott Ault	Kleinschmidt Associates (for FERC)
Jesse Wechsler	Kleinschmidt Associates (for FERC)
Tom Jereb	Pacific Gas and Electric Company
Stu Running	Pacific Gas and Electric Company