

COMMENTS ON PROJECT NO. 2105-089 DRAFT ENVIRONMENTAL IMPACT  
STATEMENT UPPER NORTH FORK FEATHER RIVER PROJECT CALIFORNIA

October 31, 2004

Ms. Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: Late filed answer response due to computer problems and need to overnight mail. Please accept this response and accept my apology.** Comments on Project No. 2105-089 Draft Environmental Impact Statement Upper North Fork Feather River Project California

Dear Ms. Salas:

I have reviewed the FERC/DEIS-0172D for hydropower license – FERC Project No. 2105-089. My expertise is in freshwater aquatic biology. I am a retired California Department of Fish and Game District Fishery Biologist for Plumas County with over 32 years of service. Twenty-five of those years were spent working at Lake Almanor (LA) and Butt Valley Reservoir (BVR).

I have the following comments:

1. Pg 21; 3-10. I recommend initial monitoring during years one through five of the new license. After this, surveys reduced to every three years.
2. Pg 21; 16-19. I recommend that all fish populations be evaluated in Lake Almanor (LA) and Butt Valley Reservoir (BVR).
3. Pg 34; 14-23. Various springs are listed. Are Pratt Spring and Dotta Spring presently active? Why was Bailey Springs and Mud Creek Spring not listed?
4. Pg 47; 1-4. I oppose any consideration of a thermal curtain as a “reasonably” practical control measure to accomplish the 20°C goal in the Rock Creek and Cresta by passed reaches.
5. Pg 68; 29-30. Three locations are not sufficient to adequately monitor the water quality in LA. I recommend a minimum of six locations. (1) in the channel near the Canyon Dam intake structure, (3) in the east arm, (1) near the Prattville intake, and (3) in the west arm.
6. Pg 73; 3-5. states: “Lake Almanor limnology could be highly influenced by operational changes incorporated into a new license for this project, as well as the potential modification of the Prattville intake agreed to under the Rock Creek-Cresta SA.” I am opposed to any operational changes or modifications that could highly influence LA’s limnology. Summer water conditions are presently borderline for salmonid growth and survival.

7. Pg 78; 17-20. I am opposed to modifying the Prattville intake under any circumstance due to the adverse impacts to LA and BVR.
8. Pg 78; 5-7. I agree with your statement: “Modification and implementation of the Prattville intake and/or the implementation of other water temperature control measures is expected to substantially alter the thermal and DO regimes of the Lake Almanor, Butt Valley Reservoir, and the NFFR” I therefore oppose any modification to the Prattville intake (especially the thermal curtain alternative).
9. Pg. 78; 26-32. I am opposed to PG&E’s proposal to switch Canyon Dam releases without a study of the affects on salmonid habitat, DO, water temperature etc. PG&E proposes to increase the MIF in the Seneca reach from 35 cfs year-around to flows ranging from 60-150 cfs, depending on month and hydrologic water year type. If this proposal changes water levels in LA, I would oppose it.
10. Pg. 89; Table 3-13. I question the accuracy of these surveys as the Tui Chub (TC) (which is one of the most abundant species in LA), were not collected. TC compete heavily with salmonids, bass and freshwater smelt for food and should be included with salmonids and freshwater smelt as species proposed to be studied in LA and BVR. LA also supports one of the top trophy smallmouth bass (SMB) fisheries in the State, however they are not included as one of the species to be monitored. I recommend that SMB be included as one of the species to be studied in LA and BVR
11. Pg 91; 19. states: “Average depth of the reservoir (LA) is 60 feet,…” I question this figure. It is my recollection that the average depth is closer to 39 feet.
12. Pg 92: 1-3. Only one creel survey conducted by PG&E in 2000 does not accurately portray the species composition of the angler’s catch. California Department of Fish and Game (CDFG) has extensive creel census surveys for the past 35 years. These surveys should be used to more accurately determine angler’s catches.
13. Pg 92; 4-6. I disagree with the statement ... “that wakasagi tend to be aggregated at the thermocline”. My observations over the years show that the freshwater smelt (wakasagi) prefer depths less than 25 feet. I recommend that more extensive surveys be conducted on the distribution and population size of freshwater smelt in both LA and BVR.
14. Pg 94; 11-12. :“The reservoir supports a trophy rainbow and brown trout fishery, with trout more than 17 inches long comprising a substantial portion, 33 percent, of angler catch” (see table 3-14) (EA, 2001). Should the referenced table be table 3-15? Table 3-15 uses the figure of 37 percent vs 33 percent stated. The importance of the above data on BVR’s wild trophy trout fishery is that this fishery would be eliminated with modifications to the Prattville intake. BVR is one of the State’s top wild trout trophy fisheries. Anglers have caught trout in excess of 18 pounds. BVR is also one of the few lakes in the State that are supported by wild trout vs hatchery plants. The importance of the BVR fishery cannot be over emphasized.
15. Pg 94; 16. states “...not known if wakasagi also reproduce in BVR.” I have observed wakasagi spawning both in the BVR powerhouse tailrace area and at the mouth of Butt Creek.

16. Pg 94; 16-18. Sacramento Perch (SP), a native FS sensitive species and California Fish Species of Special Concern is listed in table 3-13 as a species identified in BVR in (1996-2002). However on page 94, it is omitted as a species present in BVR. SP are present in both waters.
17. Pg 98; 11-19. Sacramento perch were introduced into LA in 1964 and have successfully reproduced. Once fairly abundant, they are now rarely caught by anglers. The DEIS states that their "Preferred habitat contains beds of rooted and emergent aquatic plants which are critical for food and cover for juveniles." Due to their schooling habitat prior to and during spawning, SP are vulnerable to detrimental habitat changes.
18. Pg 132; 1-10. In the past, anglers have been observed catching large numbers of SP at the Canyon Dam intake tower. I suspect that SP are entrained at this location. SP have been entrained at the Prattville intake tower. SP should be added to the species to be studied at LA and BVR as they appear to be close to extinction at both LA and BVR.
19. Pg 130; 10-12. I question the wisdom of PG&E's proposal to remove the Gansner Bar fish barrier. Allowing rainbow trout from downstream waters to migrate into the upper Belden reach for spawning may be beneficial. However, allowing additional Sacramento suckers free access to this reach would be detrimental to the trout population.
20. Pg 134, 24-40. The DEIS states that: "Modifying the configuration of the Prattville intake ... represents a cumulative effect that would likely cause a reduction in the amount of coldwater habitat in Lake Almanor, which would affect the existing coldwater fish community. Modifications ... would cause a substantial depletion of the hypolimnion (64 percent), which would negatively affect salmonid (rainbow trout, brown trout, and Chinook salmon) and wakasagi populations in Lake Almanor by decreasing available coldwater habitat during the summer. This decrease in coldwater habitat would concentrate fish that prefer such habitat during the summer. This decrease in coldwater habitat would concentrate fish that prefer such habitat into a substantially smaller area." I have spent 25 years studying the distribution and survival of salmonids, water temperatures, dissolved oxygen (DO) levels etc. in LA. Any unnatural depletion of the hypolimnion or coldwater habitat due to modifications to the Prattville intake would be devastating to the coldwater fish community. The negative affects of concentrating additional coldwater fish into limited areas consisting of inflows of cool oxygenated water in the springs and mouth of tributary streams would be devastating. Concentrating fish into a narrower band of water around the thermocline would also be devastating. The ill effects of crowding large numbers of fish in these areas increase stress due to competition for habitat, increase in disease and parasites, and the possibility of starvation. An example of this is over the past 15 years thousands of rainbow trout migrate each July-August from all around the lake to the mouth of the Hamilton Branch where they seek cooler oxygenated water. These fish become so crowded they become stressed, reduce or discontinue feeding and become heavily infested with parasites. I contribute the poor over-winter survival of trout to the overcrowding at this and other limited summer holding areas.

21. Pg 206; 8-16. The inaccessibility of the Alder Creek boat launch is preventing a substantial number of recreation users from enjoying BVR. I recommend that the modifying of the boat launch take place during the first year after license issuance.
22. Proposed new recreational resource enhancement measure: Increased development of private lands around LA is limiting lake access to shore anglers, especially in high fish concentration areas. The Hamilton Branch (HB) area (powerhouse upstream to Hwy A13 bridge) is the highest used area by shore anglers. I highly recommend that PG&E deed their lake-creek frontage surplus property at the HB powerhouse to the CDFG. This property is one of the few angler accesses to LA and the HB powerhouse outfall during the winter months. (PG&E crews remove snow from county road A147 to the powerhouse). This lakefront property is adjacent to Lassen View Resort which has been the location of the joint Almanor Fishing Association and CDFG cage culture program since 1980. This highly successful program rears 50,000 rainbow trout (which is over half the total rainbow trout allotment for LA). Lassen View Resort is presently in escrow. When the sale is finalized the cage culture program will probably have to be terminated as there is no other suitable site to rear the trout except subject PG&E lake frontage property. Loss of the cage culture program would have a *significant* effect on the LA fishery.

Thank you for the opportunity to comment on your DEIS.

Sincerely,

Ron Decoto  
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