Isabella Bledsoe, Taylorsville, CA.
September 16, 2021

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E. Room 1A
Washington, DC 20428

Subject: Dixie Fire Impact on Relicensing FERC Project 2105

Dear Secretary Bose:

We, the Lake Almanor Watershed Advisory Group (LAWG) In Plumas County, CA, are writing STRONGLY to call your attention to the Dixie Fireâ€™s massive impact on the Upper Feather River (FERC PGE Relicensing Project 2105). The current nearly 1,000,000 Acre (1500 sq. mile) Dixie Fire (CA) entirely surrounds Lake Almanor and a majority of the Feather River Watershed. (See Dixie Fire Incident map below.)

This huge impact reinforces our May 2021 recommendation that FERC adopts the Lake Almanor Settlement Agreement of April 2004 in issuing the license for PG&Eâ€™s Upper North Fork Feather River Project (FERC Project No. 2105). (See attached LAWG support letter of May 2021).

The entire watershed structure and function will be changed by this immense fire, centered around Lake Almanor. The vitality of Lake Almanor and the entire Feather River is at risk. Significant changes in run-off, soil erosion, chemical inputs including phosphorus, nitrogen, and metals from fire retardants and burned structures, will promote turbidity and algal growth and result in deleterious changes in fish populations, habitat, seasonal temperature, and thermal regimes in the lake. The Feather River itself will be similarly impacted, invalidating any recent scientific assertions about how selected releases of water from Lake Almanor might improve habitat and temperatures 30 miles downstream or affect downstream activity.

The extent of the fire as it transforms Lake Almanor and the Feather River is easily visualized from this map of the fire extent. (Source: Inciweb.nwcg.gov, Dixie Fire (CA), 9/11/21). For reference, the distance from the bottom of the fire to the top is roughly 60 miles. Even as the fire still burns, the extent of the impact is highlighted in the attached document: â€œJUST THE BAER FACTS: BAER Hydrologists assess Dixie burned watershedsâ€ https://inciweb.nwcg.gov/incident/article/7811/65867/.

In the face of these changes, the impact of any demands on Lake Almanor beyond that envisaged in the originally agreed upon 2004 Settlement Agreement could very well irreparably damage Lake Almanor as a fishing and recreation lake. Recent PGE grants

of ancestral land to the local indigenous native American community along the shoreline of Lake Almanor could also be adversely affected.

We urge you to adopt the original settlement agreement as part of the Project 2105 approval.

Sincerely,
Lake Almanor Watershed Group

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Attached Letter Submitted to FERC May 24, 2021

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E. Room 1A
Washington, DC 20428

Dear Secretary Bose:

As members of Lake Almanor Watershed Advisory Group (LAWG) in Plumas County, northern California, we urge FERC to support the Upper North Fork Feather River Project (FERC Project No. 2105) Relicensing Settlement Agreement of April 2004) in the issuing of the license for PG&E. This agreement reflected then, and now, FERC, PGE, and local Lake Almanor management consensus requirements.

We have supervised water quality studies in the Lake Almanor watershed since 2009, and our data show that the withdrawal of cold water from the reservoir at the rate authorized by the California State Water Resources Control Board (SWRCB) will have several deleterious impacts on water quality without

achieving the objective of lowering water temperature in the Rock Creek-Cresta Reach, thirty miles downstream. These include diminishing or destroying the coldwater fish habitat in Lake Almanor, mixing of the nutrient-rich hypolimnetic water into the thermocline, which will increase algal growth, and transporting nutrients and metals into the Feather River downstream of the reservoir.

Our studies show that water quality in Lake Almanor has worsened since 2009 and that coldwater fish habitat is already severely restricted, especially in drought years. However, no current data have been presented to support the supposition that cold water withdrawal from Lake Almanor will improve fish habitat thirty miles downstream.

We are strongly opposed to Alternatives 1, 2, and 3 as developed by SWRCB, since any of these alternatives will further impact water quality in Lake Almanor.

We ask that FERC deny any withdrawal of cold water from Lake Almanor beyond the amounts agreed to in the Settlement Agreement. We strongly suggest that FERC direct PG&E to implement in-stream methods to enhance fish habitat in the Rock-Creek Reach and tributaries upstream. Such actions as restoring riparian vegetation, deepening existing in-stream pools, and creating new pools, as well as shading and insulating the penstocks which deliver cold water from Butt Creek Reservoir will be much more cost-effective than the construction of thermal curtains.

Sincerely,

Lake Almanor Watershed Group

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