



United States
Department of
Agriculture

Forest
Service

Plumas
National
Forest

159 Lawrence Street
Quincy, CA 95971-6025
(530) 283-2050 Voice
(530) 534-7984 Text (TDD)

File Code: 2770

Date: March 24, 2015

Peter Barnes, Engineering Geologist
State Water Board Resources Control Board
Division of Water Rights
Water Quality Certification Program
P.O. Box 2000
Sacramento, CA 95812-2000

Subject: FOREST SERVICE COMMENTS ON THE STATE WATER RESOURCES
CONTROL BOARD DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE UPPER
NORTH FORK FEATHER RIVER PROJECT, FERC NO. 2105

Dear Mr. Barnes:

The Forest Service (USFS) appreciates this opportunity to provide comments on the State Water Resource Control Board's (SWRCB's) November 26, 2014 Draft Environmental Impact Report (DEIR) for the Upper North Fork Feather River Hydroelectric Project No. 2105. While comments are optional, upon review of the DEIR, the USFS is concerned with SWRCB staff's proposed modifications to the 2004 Settlement Agreement, which would exclude the provision to provide pulse flows in normal and wet water years – in the Belden reach.¹

Our primary concern with this proposal is that it would conflict with our mandatory Final 4(e) Condition No. 25 which requires the licensee to provide pulse flows in the Belden reach during January, February, and March of Normal and Wet water-years to produce more natural variability in stream flows and sediment regimes. Specifically, these pulse flows are intended to result in flushing of fine sediments and redistribution of gravel-sized substrates used by spawning fish. In addition these pulses are anticipated to provide additional recreational whitewater boating opportunities.

The DEIR proposes to accommodate increases in minimum instream flow releases, following a modified flow schedule, utilizing the volume of water required under the separate pulse flow provision. However, in the view of the USFS, the DEIR does not provide sufficient explanation or justification to explain why staff has chosen to achieve a "water neutral" flow schedule for this reach by eliminating pulse flows. It also does not explain the potential impacts removing pulse flows would have in the Belden bypassed reach. At this time, the USFS does not intend to change or amend Condition No. 25. For these reasons, the USFS suggests that staff seek to achieve their proposed changes in minimum instream flows without changes to the pulse flow provision.

¹ DEIR, page 4-10, Alternative Belden Reach Flows



We would appreciate the SWRCB addressing this concern in their Final EIR. We look forward to assisting the SWRCB in implementing actions on National Forest System lands when a new license is issued. If you have any questions regarding this filing you may contact Amy Lind (Tahoe and Plumas National Forests, Hydroelectric Coordinator) at (530)478-6298 or alind@fs.fed.us.

Sincerely,



DEBRA WHITMAN
Acting Forest Supervisor
Plumas National Forest

cc: Cheryl Mulder, Mike Donald, Amy Lind, Tristan Leong