

From: Jereb, Thomas [REDACTED]
Sent: Monday, October 17, 2005 3:24 PM
To: 2105comments@nsrnet.com
Cc: sstohrer@waterboards.ca.gov; uncapher@nsrnet.com; James Reilly
Subject: PG&E Comments on CEQA Scoping for UNFFR Project (FERC 2105)

Follow Up Flag: Follow up
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Sharon, Attached is a pdf file of a letter I signed today with PG&E's comments on the CEQA Scoping for the Upper North Fork Feather River Project (FERC 2105). I have mailed you the original letter which includes an attachment. The attachment to the letter is not included in this e-mail because of its size however you have previously received a copy of the report.

Thank you.

Tom Jereb

<<Sharon Stohrer.pdf>>

October 17, 2005

Ms. Sharon Stohrer
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000

**Re: Upper North Fork Feather River Project – FERC No. 2105
Comments on CEQA Scoping**

Dear Ms. Stohrer:

This letter provides Pacific Gas and Electric Company's (PG&E) comments on CEQA scoping for the above referenced Project. PG&E would also like to comment on several issues raised by others at the September 27, 2005 public scoping meeting in Chester.

Relicensing Settlement Agreement

PG&E is pleased to see the State Water Resources Control Board (SWRCB) agreeing to give consideration during the CEQA process to the Relicensing Settlement Agreement (Settlement) signed by numerous parties on April 22, 2004. The Settlement represents the concerted effort of a broad based group of resource agencies, public entities and non-governmental organizations. The Settlement addresses many key issues concerning the Project and its operation. PG&E believes the Settlement provides the necessary balance between the competing beneficial uses of water of the environment, recreation and power generation. PG&E values the SWRCB staff participation in the collaborative relicensing process that led to the Settlement and appreciates the SWRCB's policy to promote voluntary settlement agreements.

Operation of Lake Almanor

PG&E operates Lake Almanor to meet a variety of important beneficial uses including:

- 1) providing water for reliable electrical power generation when the power is needed;
- 2) providing water for recreation opportunities and to support the local community;
- 3) providing water for environmental benefits;
- 4) providing water for irrigation at the Western Canal;

- 5) providing flood control for both lake-side and downstream property; and
- 6) preserving full use and full exercise of its established water rights.

It is important to understand that all of these important beneficial uses were given great consideration by those parties involved in the development of the Settlement resulting in the specific proposed reservoir operation requirements. PG&E requests the SWRCB give consideration to the above important beneficial uses when considering the operation of Lake Almanor.

Agricultural Resources

The CEQA environmental checklist has a category titled "Agricultural Resources". PG&E's operation and corresponding water rights for the Project includes water deliveries for irrigation uses to the Western Canal below Lake Oroville. PG&E anticipates being able to meet the irrigation water deliveries with the reservoir operations proposed in the Settlement. Any further changes in the operation of the Project that have the potential of changing the timing or magnitude of irrigation water deliveries for the Western Canal could have corresponding agricultural effects. This important relationship needs to be addressed in the CEQA process.

Air Quality

The CEQA environmental checklist has a category titled "Air Quality". Hydropower is recognized as a clean energy producer. The CEQA process should address the air quality impacts of replacement generation resulting from anticipated reduced Project generation. PG&E addressed air quality in its Application for New License (See Application Volume 4 of 8, Report E7).

Geology and Soils

Several individuals at the September 27, 2005 Scoping Meeting commented about shoreline erosion. PG&E has studied and evaluated shoreline erosion at Lake Almanor. While the studies did find several areas of high erosion potential, no water quality or other adverse biological or physical environmental effects were identified from the ongoing erosion processes on Lake Almanor shorelines. Based on study results, the shoreline erosion does not hinder Project operation or significantly affect the overall aesthetic, recreational, or environmental values of the Project. However, for certain adjacent property owners, areas of high shoreline erosion may conflict with the owner's desire to develop or maintain shoreline structures and improvements or open viewing areas on the shoreline bank. PG&E recognizes the desire of some to prevent the erosion process in order to maintain shoreline banks. Accordingly, PG&E has developed an Erosion Control Plan that is included in the Shoreline Management Plan in the Application for New License (see Application Volume 8 of 8, Appendix E6-E). The Erosion Control Plan

includes maps showing where the erosion is occurring at or above the 4,500-foot elevation, existing PG&E and private riprap locations, and existing property right areas. This plan also contains several methods for protecting the shoreline from erosion for potential implementation by shoreline owners who wish to protect their shorelines.

In summary, the important question about erosion at Lake Almanor is whether or not erosion is leading to adverse environmental impacts. Erosion studies were undertaken for relicensing, and shoreline erosion has been mapped and found to be a localized phenomenon with no observed or measurable adverse aquatic or water quality effects. That is, the environmental effects from the erosion at Lake Almanor shorelines have not been found to lead to water quality problems nor have these effects been found to be a problem for the aquatic health of the reservoir.

Cultural Resources

Several individuals at the September 27, 2005 Scoping Meeting commented about cultural resources. Specific comments were made about potential cultural resources near Prattville Intake area. PG&E has surveyed the Prattville Intake area within the FERC license boundaries, above the low water mark level, for cultural resources. Tribal monitors participated in the surveys and no cultural sites were found in this area. No detailed records exist about cultural resource sites for the area inundated by water near Prattville Intake. Also, cultural studies for the relicensing did not result in the documentation of any grave sites in this area. Tribal representatives, however, have expressed concern about the existence of such grave sites in the past. During the Project 2105 Collaborative Group meetings PG&E addressed this subject in greater detail (See PG&E October 14, 2004 response to Question 1 of the "20 Question Document – Prattville Temperature Issues – August 25, 2004").

One individual at the September 27, 2005 Scoping Meeting commented about Indian allotment lands. This subject has been previously addressed by PG&E and FERC (See FERC's September 2004 Draft EIS for the Project 2105, page 282).

One individual at the September 27, 2005 Scoping Meeting commented about the Programmatic Agreement. As the SWRCB staff may be aware, on August 11, 2005 FERC issued a final Programmatic Agreement for the Project. Programmatic Agreements are routinely issued by FERC as a means to satisfy its responsibilities under Section 106 of the National Historic Preservation Act (16 U.S.C. 470f). On September 21, 2005 PG&E signed the Programmatic Agreement as a concurring party. Among other items, the Programmatic Agreement requires PG&E to file within one year of license issuance a Historic Properties Management Plan (HPMP) specifying how historic properties will be managed in the Project's Area of Potential Effects. PG&E intends to use a reformatted version of its Cultural Resources Management Plan (See Application Volume 2 of 8, Section E4.4) for its HPMP.

Water Temperature

PG&E is pleased to see the SWRCB evaluation of alternative water temperature measures includes 1) the ability of a measure to provide temperature moderating benefits to the affected North Fork Feather River reaches; 2) the cost of implementation versus predicted benefits; and 3) the potential for incidental environmental impacts that may result from the implementation of a measure. As the SWRCB staff is aware, on July 28, 2005 PG&E filed with FERC in conjunction with the Rock Creek-Cresta Project (FERC No. 1962) a comprehensive report on water temperature monitoring and evaluation of additional water temperature alternatives for the North Fork Feather River. PG&E filed an amended report on September 19, 2005 to clarify the intent of the report. In its report PG&E uses the same three criteria listed above in its evaluation of alternatives. Attached is a copy of PG&E's amended report for your use in this proceeding.

At the September 27, 2005 Scoping Meeting PG&E observed in the North State Resources, Inc. poster board and meeting handout a chart titled, "Water Temperature Profile along North Fork Feather River". This chart includes a red-dashed line which we understand to represent estimated river water temperatures for a pre-project (no Lake Almanor, no power projects) condition. PG&E is not aware of any available pre-project river water temperature data. However, previous SSTEMP computer model analysis by PG&E suggests that significant warming would have occurred in the very flat unshaded Big Meadows area now occupied by Lake Almanor and that the July-August mean daily river water temperature at the Canyon Dam site, prior to construction of the Project, was likely in the range of 17 to 19 degrees Celsius. Starting with these river water temperatures at the Canyon Dam site would result in a very different pre-project river water temperature profile than the one presented by North State Resources, Inc. PG&E will provide this previous SSTEMP analysis to the SWRCB staff and North State Resources, Inc.

At the September 27, 2005 Scoping Meeting PG&E observed in the North State Resources, Inc. poster board and meeting handout a chart titled, "Examples of Temperature Requirements/Preferences for Coldwater and Warmwater Fishes". As stated in the lead paragraph of that chart, a combination of suitable water temperatures and dissolved oxygen levels are critical for maintaining a healthy and productive aquatic ecosystem in the North Fork Feather River. It is widely accepted that the determination of optimal water temperatures is a complex issue including, but not limited to, differences in acclimation temperatures, physiological condition, state of health, season, photoperiod, and the race of fish being tested. PG&E is concerned that identification of set end points for "marginal", "optimal", and "lethal" conditions does not convey the considerable variance in trout temperature tolerances described in the scientific literature. While the 20 degrees Celsius shown in the bar chart for rainbow trout is usually considered the upper limit for optimal feeding and growth, the lower temperature minimum of 11 degrees Celsius for the optimal condition is lower than what PG&E has seen generally supported in the scientific literature. For example, Behnke (1992) listed 13 degrees Celsius and Moyle (2002) listed 15 degrees Celsius as the lower limit of optimum temperatures for feeding and growth; 2-4 degrees Celsius higher than shown in the chart. Because the change

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from marginal to optimal to lethal is not instantaneous in nature but actually occurs over a range of several degrees, PG&E recommends that this range either be graphically illustrated with transition shading between bands and/or be described in the CEQA analysis text.

References

Behnke, Robert J. 1992. Native Trout of Western North America. Department of Fishery and Wildlife Biology, Colorado State University, Fort Collins, CO. American Fisheries Society Monograph 6. AFS, Bethesda, MA.

Moyle, Peter B. 2002. Inland Fishes of California. University of California Press. Berkeley, CA.


Water Quality Monitoring

One individual at the September 27, 2005 Scoping Meeting commented about the need for future water quality monitoring at Lake Almanor. The Settlement has provisions for future periodic water quality monitoring. PG&E has prepared a water quality trend analysis (see PG&E's October 29, 2004 comments to FERC on Draft EIS for water quality trend analysis information) using available water quality data. This water quality trend analysis was used to support the scope and frequency of monitoring in the water quality monitoring program proposed in the Settlement (see Settlement, Appendix A, Section 5).

The Settlement also recognizes the various shared responsibilities for monitoring and protecting water quality in Lake Almanor. PG&E and Plumas County have agreed to jointly fund water quality monitoring (See Settlement, Appendix B, Section 1).

Thank you for your consideration of the comments provided herein. If you have any questions, please call me at (415) 973-9320.

Sincerely,



Tom Jereb
Senior Project Manager

Enclosure