Barnes, Peter@Waterboards

From: Sharon Auge <smaandlja@yahoo.com>
Sent: Thursday, March 26, 2015 10:28 AM
To: Barnes, Peter@Waterboards
Subject: Objections to the findings of the draft EIR for Project 2105

March 26, 2015

Mr Peter Barnes
Engineering Geologist
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812

Via email - Peter.Barnes@waterboards.ca.gov

We are registering our objections to the findings of the draft EIR for Project 2105.

1. Every public documented concern was found to be insignificant. There is little to no explanation as to how each of the concerns was found to be significant. It is difficult to believe that a project of this magnitude and complexity does not have any significant issues.
2. The draft EIR does not contain any historical data on the water temperatures in the NFFR prior to the installation of the hydroelectric plants nor after their installation. It is unclear as to whether or not the water temperature in the NFFR was increased. The proposed recommendations are not based on verifiable scientific calculations.
3. Not all involved agencies staffs such as FERC, the Redding office of SWRBC, and Plumas County agree that the NFFR is temperature impaired, nor that the withdrawal of cold water from Lake Almanor is cost effective or appropriate and that the proposed recommendations will achieve the stated goal of lower water temperature in the NFFR.
4. The cost of the recommendations, in particular the installation of thermal curtains in Lake Almanor and Butt Lake, over the 50-year life of the license is estimated to be in excess of $650 million (2009 dollars). This is not a reasonable cost for an experiment to possibly improve fish habit in a river many miles from the Lake Almanor basin.
5. In fact, the Federal Energy Regulatory Commission in its DEIR stated that the thermal curtains could not meet the “reasonableness test” of the agency. How can this possibly be in the best interest of the public?
6. The recommendation to pull cold water from Lake Almanor and Butte Lake presents a risky solution to lower the water temperature in the NFFR. However the draft EIR does not contain a risk analysis of this recommendation.
7. All versions of methods of withdrawing cold water from Lake Almanor carry the serious risk of warming the lake to the threshold of causing algae blooms. Algae blooms give rise to various toxins, including cyanobacterial blooms that are poisonous to humans, pets, livestock, birds and other wildlife via ingestion, inhalation or skin exposure. What is the probability that this recommendation will not work and negatively alter the ecological balance of these lakes? How will this risk be mitigated? If the ecological balance is negatively affected can it be restored?
8. The withdrawal of cold water from Lake Almanor should not be allowed until these questions are answered, and the science around algae blooms is vetted and commonly understood. AB 300, now moving through the California legislature recognizes this problem in California water bodies, so should the SWRCB in this project DEIR.
9. The withdrawal of cold water from Lake Almanor promises to cause property value damage to members of the West Almanor Community Association as well as all owners around the lake. More importantly, the tenuous economy of the Lake Almanor Basin will be devastated if this well-known fishery and resort area is harmed.

The process followed to develop Project 2105 and the draft EIR violates the spirit and intent of CEQA. For example public input was very limited in 2005 and after taking 10 years to release the draft EIR the public is given only 4 months to submit input.

On behalf of our community property owners we ask that the SRWCB move forward with approving PG&E's FERC application without implementing the recommendations in the Project 2105 draft EIR.

Sincerely,

Sharon & Larry Auge
209 Goose Bay View Trail