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

VIA EMAIL: Peter.Barnes@waterboards.ca.gov

RE: Draft EIR, PG&E Certification UNFFR Project NO 2105

Dear Mr. Barnes,

There was a similar water release issue that raged for a number of years on a nearby lake, Lassen County's Eagle Lake. This particular lake has no dam, but yet water was diverted into Willow Creek via a piping and water valve system located in what is known as the Bly Tunnel.

Downstream ranchers claimed historical water rights as an argument in continuing the release of waters from Eagle Lake into Willow Creek. A committee, composed primarily of lake residents, with support from the Department of Fish and Game, Department of Water Resources (Charlie Rich), the courts, along with key senators and legislators, it was finally determined that continuing further releases of waters from Eagle Lake would eventually lead to the ruination of a unique fish, an historical fishery, and further destruction of the environment.

Eagle Lake falls under the purview of the Bureau of Land Management (BLM), and they were finally ordered to permanently seal the valves in the Bly Tunnel to prevent water from being released into Willow Creek. While the pipes and valves still exist to this day, the valves were welded shut to never be opened again. That order was effective, as I remember, in 2013.

While there is groundwater seepage that will trickle into Willow Creek, actual water releases have been permanently discontinued.

There is a definite direct corollary between the water release issue at nearby Eagle Lake and its Plumas County neighbor, Lake Almanor.

While water ownership may be totally different, the issue of cause and effects of water releases do not differ.

By comparison, Eagle Lake has 27,000 surface acres, Lake Almanor comprises 28,000. Both lakes are very shallow lakes. Many parts of Lake Almanor throughout the center areas where one would expect very deep water, depth finders will reveal the depth as barely 40-feet. There is a channel near the dam and pump where you can find depths in the 90-foot range, but that makes for a very small portion of this waterway. With California now entering it's fourth year of drought, water levels are even further exacerbated by both water releases along with natural evaporation.

While warmer water fish species do call Lake Almanor home, such as smallmouth bass and brown bullhead catfish, this alpine lake is primarily a salmonid and trout lake, and it ranks as one of the state's most premier recreational fishing lakes, with trout ranging into the mere bragging size to state record size. A new lake record for a German brown trout was set this past July with a fish that tilted the scales at just over 16 pounds.

Due to regular water releases from Lake Almanor for downstream requirements, coupled with minimal inflows to replace any water releases, the lake level has dropped to dangerously low levels for the salmonid and trout populations. The waters have warmed to the point fish school en masse to areas where cooler waters may prevail, such as around underground springs and in Hamilton Branch.

Trout and salmonid have two requirements: an adequate food supply and cooler waters. It's common in the heat of the summer months to find surface temperatures at Lake Almanor easily ranging in the upper 70+ degree ranges. While species such as rainbow trout (actually a salmonid) and German brown trout will survive in temperatures up to 77-degrees, they will actually stop growing at 73-degrees and stress will start at 68-degree water temperature. Increased water temperature will destroy the fish's main food supply, the Japanese Pond Smelt, that today thrive in large numbers.

It is also known that warmer water contains less oxygen than colder water. As the water temperatures rise and oxygen decreases, fish become more stressed. The same stresses will set in well before the water temperature rises to what would be lethal limits.

As an Outdoor Writer/Editor for 43 years, I visited, fished and evaluated just about every lake in the northern California region. At **NO** other lake in California did I find the excellent fishery as I found at Lake Almanor. No, not necessarily in numbers, but definitely in size. The fishing experience is and still remains totally exciting to me, to see and feel my rod totally double over with bragging size, trophy Rainbows and German browns. When I retired, I became a permanent summer resident at the lake with a seasonal site at the Vagabond Resort on the East Shore of the lake.

A lake turns over twice each year and Lake Almanor is no exception. All cold water species will follow the cooler water columns at whatever depth it may be found. With Lake Almanor being a relatively shallow lake, it does not allow a very large margin of area where cold or cooler water to settle.

With the lake owners (PG&E) proposing to remove the cooler waters, it will mean the absolute and total destruction of both the habitat, the environment, and the ruination of a world class fishery. The coldwater fishery will all but cease to exist. The excellent outdoor experience will cease to exist.

When water is released from Lake Almanor, it first goes to downstream Butt Lake. How long would it take for the cooler water released from Lake Almanor to rise to its former temperature simply traveling between Lake Almanor to Butt Lake, and sitting in Butt Lake before being released to eventually reach the Feather River? If there would be a temperature drop in the Feather River, it would be greatly minimal compared to the recreational/environmental damage to the area in and around Lake Almanor.

Lastly, but certainly no less importance is how the immediate area business would be impacted. Many of those business rely heavily upon the summer visitors that throng the area from primarily May through September.

If there is a drastic change in the condition of Lake Almanor, a great many of those visitors will simply find some other place to visit, some area where something such as the fishery is worth the while to make the visit, that the environmental conditions are congruent to their wants and needs.

If those changes to Lake Almanor are to take place, business after business, some already on shaky financial ground, in Chester, Hamilton Branch, Westwood, Canyon Dam, and even Greenville, would be seriously and adversely affected.

Water releases from Eagle Lake were determined detrimental and was stopped. The same should **not** be allowed at Lake Almanor as well.

/s/ George deVilbiss