

March 26, 2015

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

Via Email

Re: Comments on SWRCB's Upper North Fork Feather River Hydroelectric Project Draft EIR

Dear Mr. Barnes:

As a long time property owner at Lake Almanor and as a volunteer for Plumas County in the Project 2105 relicensing process, I am opposed to Alternatives 1 and 2 contained in the State Water Resources Control Board's Upper North Fork Feather River Hydroelectric Project Draft EIR. Constructing Thermal Curtains has the potential to significantly impact the visual beauty of Lake Almanor and the massive flow of cold water (both from the Prattville Intake and the outlet at the dam) has the potential to significantly harm the fisheries in the lake and downstream.

Recreational boating and fishing are major economic drivers in the Almanor basin and are responsible for much of the local economy and any negative effects are sure to be felt by the local population as well as property owners. The region has been particularly impacted by the recent economic downturn and has not yet fully recovered.

The requirement to reduce North Fork Feather River (NFFR) water temperatures forty miles downstream of Almanor Dam is driven entirely by a requirement that the Water Board follow Basin Plans that have been previously and apparently *arbitrarily* developed. For the NFFR, the Water Board designated the entire NFFR as a "COLD" water stream, a condition that was assumed to exist prior to any significant development upstream (i.e. reservoirs and flow diversions). As I understand the COLD water stream designation for the NFFR, the maximum late summer water temperatures must not exceed 20 deg C.

I've volunteered for Plumas County's Project 2105 relicensing effort since 2002 and attended almost all the Licensing Group meetings that resulted in the 2004 Settlement Agreement. While the Settlement Agreement did not specifically address the cold water issue, there was much discussion about the requirement and what it might ultimately result in, namely Thermal Curtains and massive cold water releases. While the Water Board was not a signatory to the Settlement Agreement, the board was nevertheless represented by Sharron Stohrer who actively discussed the Water Board's requirements.

At no time did I ever hear how the Water Board determined that the lower reaches of the NFFR should be designated a COLD water stream. In fact, there was plenty of discussion of why the designation should have been, at a minimum, both WARM and COLD due, in part, to a significant amount of warmer water flowing in the East Branch of the NFFR during summer months. The East Branch flow is warmed as it meanders through Indian Valley. Dick Daniels and others have presented evidence to the Water Board that the lower reaches of the Feather River historically contained a warm water fishery and should therefore be designated as a WARM water stream.

Since the Water Board's seemingly arbitrary designation of the NFFR as a COLD water stream is the sole justification for both proposed Draft EIR alternatives, the Water Board owes the public, and in particular the citizens and property owners of the Almanor basin, an explanation of just how this designation was made. Exactly how does the Water Board know that in the late summer and early fall of all years (wet, average, dry and critically dry), the water temperatures of the lower reaches of the NFFR did not exceed 20 deg C prior to construction of Almanor Dam, Butt Valley Dam, Bucks Dam, and multiple diversions?

If the Water Board does not have a definitive way of proving that the NFFR should be designated as COLD, it should not be allowed to force the construction of Thermal Curtains or the release of massive amounts of cold water.

Sincerely,

Robert A. Lambert
San Rafael, Ca and summer resident of Lake Almanor