

## Barnes, Peter@Waterboards

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**From:** Arnold <aselk@frontiernet.net>  
**Sent:** Thursday, March 05, 2015 3:21 PM  
**To:** Barnes, Peter@Waterboards  
**Cc:** Sharon Thrall  
**Subject:** Draft EIR, PG&E Certification UNFFR Project NO 2105  
**Attachments:** LtrToState-AlmanorCurtain10-14-05.doc

05 Mar 2015

California State Water Resources Board,

Attention: Peter Barnes

I sent a letter to the California State Water Resources Control Board on 14 Oct 2005 (attached).

One of my points revolved around the proposal that moving water from Lake Almanor would cool downstream waters -- possibly part of the year, but hot summer months offer different conditions. I also noted that hydroelectric generation was an affirmative, and that alternate methods for cooling Feather River water had been recommended.

None of my thinking has changed since 2005. With California's current drought conditions, the idea of diverting water flow from making energy to ostensibly "cool" downstream water for fish health seems disingenuous. I feel that the real motivation is to increase water levels in the reservoirs that supply water starved Southern California communities.

An essay, written by Bill Dennison, ex Plumas County Supervisor, was published in our local newspaper, the **Chester Progressive**. (Wednesday, March 4, 2015.) Mr. Dennison is well-versed in the history of PG&E's Lake Almanor re-licensing attempt. He presented many assumptions that need clarification. I share his concerns.

First, the basic premise the Feather River water was temperature impaired. It was doubted that a 1915 photograph of fish was adequate to derive any scientific conclusion. Mr. Dennison wrote, "The Water Board...appears willing to abuse the California Environmental Quality Act process that is required under the California Clean Water Act." He goes on to mention that "appointed officials meet the expected goal of 'do no harm'."

Next, Mr. Dennison questions why it took two years for the board to present the DEIR to the public? It seemed excessive. He includes a conversation he had in 2005 with a water board staff representative, Ms. Whitney. He quotes her as follows: "We always anticipate that we are going to be sued when we make a decision of this magnitude, because we always are, even though we seek to avoid that, so we want to make sure our document is legally defensible, as well as scientifically defensive and is good public policy".

My feeling is that there is no scientific support for the estimated pre-Almanor Reservoir downstream water temperature. And I have some concerns about Ms. Whitney's 2005 lawsuit speculation. It was indicative that the California Water Board was willing to spend State funds to continue to advocate for what appears to be an irresponsible conclusion.

Mr. Dennison mentions something about the need for "legal review". He quotes an excerpt from the PG&E July 2005 DEIR related to water temperature monitoring. "In summary, water monitoring indicates that mean daily water temperature of 20°C, or less is not consistently achieved... The goal is unrealistic and unnatural." Mr. Dennison's document mentions that ignoring this earlier PG&E conclusion allowed the water board to check the "insignificant" box that referenced the effect of cold water removal on aquatic habitat conditions of Lake Almanor.

When so many uncertainties exist, California Water Board regulations should not be promulgated. These unanswered concerns indicate weak conclusions. I don't know who is advocating for this "water temperature" change, but these seem to lack the support of the general public, especially here in Plumas County. I would think it would be fair to say that this specific California Water Board recommendation serves a small community of interest.

My feeling is that the water diversion part of the PG&E relicensing be omitted until the idea be validated by more substantial evidence or proof of success.

Sincerely,

Arnold Selk  
128 Highwood Circle  
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14 Oct 2005

California State Water Resources Control Board  
Ms. Tam M. Dudoc, Chair  
P.O. Box 100  
Sacramento, CA 95812

Re: North Fork, Feather River (FERC Project 2105)

Dear Chairman Dudoc:

We recently moved to the Lake Almanor area. This lake supports an enthusiastic and optimistic community of citizens. Many have written expressing concerns about recommendations for placing an unproven and expensive "thermal curtain" in the lake to divert cold water downstream. I concur with these objections.

This "curtain" mischief was born with the idea that consistent cold water once occurred downstream from the lake that was formed after the dam was built. The water was surely cold when the days were cold. Once summer arrived and the temperature elevated, the streams lost their chill. We can guarantee cold streams if we can guarantee the weather. No one claims to be able to do this magical feat. Why spend money uselessly studying schemes promoting the impossible? And then spend more money (over \$50 million of PG&E ratepayers levy) to construct this objectionable thing. From a responsible management point of view, it makes no sense.

Two socially acceptable givens exist. One, flooding is bad. Two, hydroelectric generation of electricity is good. Control of the Feather River has achieved these things, so the dams should stay. However, a positive may evolve from this adventure into messing with Mother Nature. An Alternative D has been suggested – Upstream Mitigation. Review examples of the results of this Alternative. Better water quality, less stream erosion, better wildlife habitat, and a pro-nature environmental engagement. How can you argue against this suggested remedy? Even if the downstream water might move above 68° during the hot season, the rest of the watershed enjoys improved health.

During the Chester Community Meeting, a high school biology class did some empirical research. It took temperature readings of Lake Almanor. The results suggest that there may not be enough cold water in the lake to support the needs for cooling downstream. Why did the students have to be the ones to do this? Shouldn't the paid research teams have included this in their reports?

Sincerely submitted,

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