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STATE WATER RESOURCES
CONTROL BOARD

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DIV OF WATER RIGHTS
SACRAMENTO

March 23, 2015

To: Peter Barnes
State Water Resources Control Board
Division of Water Rights
Water Quality Certification Program

From: Grant Holliday
Lake Almanor Area Business Owner and Resident

Subject: Draft EIR, UNFFR Hydroelectric Project Relicensing

Dear Mr. Barnes,

As a Lake Almanor area business owner , homeowner and concerned citizen I am submitting this letter to you as you represent the State Water Resources Control Board regarding the subject draft EIR (DEIR). Prior to relocating and taking up full-time residence in the Lake Almanor area in 2005, I have been coming to the area since 1964 as part of family vacations. In 1978, my family purchased a home in the area, the same home that my wife and I subsequently purchased and currently live. Having a long history with this area, I too have a substantial vested interest in the well-being of our resources and our economy.

My first comments regarding the subject project deal with the lack of due diligence by the State Water Board to provide current data to support the boards proposed alternative actions, as stated in the DEIR. Actions that could produce drastic and harmful consequences to fragile habitats and ecosystems, as well as businesses, quality of living standards and public services.

In summarizing verbiage publicized by the SWRCB, it's the boards' "independent judgment" that by initiating one or more of its' (SWRCB) alternative actions and removing cold water from Lake Almanor and Butt Lake Reservoirs will produce "no" or "insignificant" affects to these reservoirs and its' surrounding habitat. I find these opinions to be unfounded and careless. My question to the SWRCB is, how will you know? What testing metrics are going to be utilized to continuously monitor change within these sensitive ecosystems and adjacent habitats? To ascertain collection of this important data, a continuous monitoring program needs to be implemented by the SWRCB for both Lake Almanor and Butt Lake. The SWRCB needs to make public the specific testing metrics used to monitor these lakes and, at a minimum, monitoring procedures need to be conducted annually. Following the annual monitoring, public reports need to be generated by the SWRCB showing all results of its' findings.

The monitoring programs for these lakes need to include, but are not limited to, testing of water temperature, thermal stratification data, dead zones, dissolved oxygen, turbidity, changes in organic matter and nutrients, aquatic biota measurements, suspended particulates, algae growth and shore erosion. Also, please provide your specific testing metrics for monitoring all plant species, fish and aquatic life specific to Lake Almanor and Butt Lake. Lastly, please provide specific testing metrics that will be used to monitor the impacts to human health and impacts to larger animals like deer, mountain lion, raccoon, coyote, bear, northern river otter, muskrat, eagle, osprey, geese and duck. Metrics that cover all bird, mammal, reptile species that play a vital role with the health and well-being of the ecosystems and surrounding habitats for these reservoirs.

A direct question to you Mr. Barnes, involves the socio-economic impact to Lake Almanor area businesses and residents should adverse affects occur as a result of project failure. Is this being discussed by the SWRCB, or has it ever been discussed by the SWRCB? As you are well aware, Lake Almanor generates the vast majority of its' economic benefit

from tourism. The proposed actions of removing colder water from Lake Almanor, during peak tourism months is, quite frankly, a flagrant disregard for tax-paying citizens that survive from tourism revenue. The loss of tourism revenue in this area would have devastating consequences. The loss of tourism revenue would not only impact the local economy, but there would also be a trickle-down effect that would impact the state. How? By businesses closing, thus providing less tax based revenue for local and state governments. Not to mention the reduction of property values which would lead to a reduction to property tax revenues for the county and the state. The State of California continues to suffer revenue losses due to small and large businesses leaving the state. Continuing to jeopardize and suppress business development only adds to the negative economic impacts already being suffered statewide.

Another economic impact involves increased electrical costs passed down by PG&E. A direct result of the loss of hydroelectric production capability caused by the proposed actions of the SWRCB. Again, increases in the cost of living thwarts business profits and people's livelihood's. Thus creating another barrier for business and family survival and development. As businesses are no longer able to remain open and employ its' citizens, a loss of public service personnel results. Why? Businesses close and unemployed citizens leave the area or state in search of employment. A lack of taxed based revenue can't support law enforcement, fire personnel and required medical facilities (i.e. Seneca Hospital). Now you have even more residents having to leave in search of employment. End result of the aforementioned, economic catastrophe.

Lastly, there is a portion of the DEIR that needs to be addressed by the SWRCB. The DEIR as it stands, is void of any language that specifically addresses an exit strategy should harmful affects occur to Lake Almanor or Butt Lake. Wouldn't harmful affects to either of these reservoirs be contrary to the State Water Board's Mission Statement? That being said, please provide your detailed exit strategy should the SWRCB proposed action plans fail. And, include the language of your exit strategy in the body of the DEIR document.

In summary, the SWRCB has a fiduciary duty to look out for the well-being of water resources and beneficial uses in the State of California. In addition, the SWRCB also has a fiduciary duty to protect the environment and public health of its' citizens. To date, the SWRCB seems to be neglecting its' fiduciary duties by disregarding public, state and federal agency comments related to elimination of cold water from Lake Almanor and Butt Lake Reservoirs. The plan of removing cold water from shallow reservoirs (Lake Almanor and Butt Lake) without causing grave environmental and socio-economic consequences is at a minimum flawed and careless. To the point of ongoing legal scrutiny and likely legal battles pending. The SWRCB needs to do additional research to find other methods of assistance toward cooling downstream water in the Feather River without damaging needed and valuable upstream resources and economies. Frankly, the "rob Peter to pay Paul" principle is filled with negligence. The SWRCB needs to pause, re-evaluate the DEIR and discontinue any proposed action plan that authorizes the removal of any amount of cold water from Lake Almanor or Butt Lake Reservoirs causing unintended, unwanted and unnecessary environmental, ecological or socio-economic damage.

I look forward to the SWRCB addressing these matters and action items.

A handwritten signature in black ink, appearing to read "Grant Holliday", with a large, stylized flourish extending from the end of the signature.

Grant Holliday