

STATE WATER RESOURCES  
CONTROL BOARD

2015 MAR -2 AM 11:05

DIV OF WATER RIGHTS  
SACRAMENTO

STATE WATER RESOURCES  
CONTROL BOARD

Thomas P. & Bridget C. Johnston

3854 Mary Ann Lane.

Lake Almanor, CA 96137

(530) 596-3681

February 25, 2015

DIV OF WATER RIGHTS  
SACRAMENTO

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

Mr. Barnes:

Once again we write to protest the proposed project for the Upper North Fork of the Feather River, following the public meeting SWRCB co-hosted in Chester, CA on 2/11/2015 to discuss its Draft EIR and also following up on our letter to Sharon Stohrer of the State Water Resources Control Board dated 10/2/2005.

Our objections are multiple, starting with the lumping together of two distinct and seemingly contradictory goals. The UNFFR Project should obviously address the hydroelectric aims of the licensee as they relate to the systems at Lake Almanor and Butt Lake as well as the maintenance of those systems. This UNFFR Project should never have been extended to include a secondary goal of water temperature manipulation to make up for deficiencies arising from a prior license application for the Rock Creek / Cresta project area miles away.

Since the beneficial uses of this Project for Lake Almanor and Butt Lake by definition cannot be met if those bodies of water are forced to attempt to accommodate the secondary and unrelated goal of the Rock Creek / Cresta areas, we urge the SWRCB and other involved agencies to go back to the original decision that combined these two contradictory goals, separate them out, and properly re-establish the UNFFR Project as pertaining only to the immediate areas of Lake Almanor and Butt Lake. Any perceived temperature problem of the Rock Creek / Cresta waters is not caused by the operation of Lake Almanor and/or Butt Lake, and those lakes should not be obligated to provide a solution - especially to their own detriment.

Other objections we have to the SWRCB Draft EIR recommendations include:

1. Viable alternatives to the thermal curtain / increased water flows from Lake Almanor were dismissed without discussion and seemingly without reason.
2. Costs of installation, maintenance, and even possible removal of the installation should that be warranted were not addressed.
3. Specific parameters to evaluate effectiveness should the recommendations be


implemented were not set - either in achieved temperature levels or in time frame required.

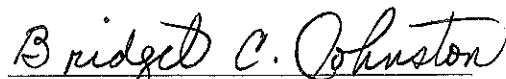
4. Prior suggestions by Pacific, Gas, & Electric personnel at the 8/2/2004 meeting in Chico to explore the re-designation of the Rock Creek / Cresta fishery as warm water as well as cold water seem to have been ignored.
5. It is a given that there is a finite amount of water available to be distributed among all the water bodies from Mt. Meadows Reservoir all the way through the Rock Creek / Cresta Reach and beyond. Therefore, any recommendation to dramatically increase the outflow of water from one area, specifically from Lake Almanor, automatically affects the level of water in that lake, especially in dry years and most especially in the late summer months. No discussion in the Draft EIR has been given to this artificially lowered lake level on:
  - (a) The economic impact on the surrounding, year-round-supporting communities
  - (b) The potential for increased and more frequent algae bloom
  - (c) The disruption of the unique cycle of Lake Almanor's annual "turn-over", which has contributed greatly to Lake Almanor's historic enviable water quality.

Nothing in these comments or in protest comments from others is new. We have raised these objections repeatedly in years past. Other agencies have listened and reasoned their way to agreement in their opposition to the concept of a thermal curtain on Lake Almanor: FERC - opposed; California Fish and Wildlife - opposed; PG&E - opposed; affected California congressmen - opposed; affected California state senators and assemblymen - opposed; local fishing guides and tourism directors - opposed; and the unanimous voice of local residents - opposed. Is all this opposition really "less than significant"? (a poor choice of words, if ever there was one!) Where is the transparency in the SWERB decision-making process? Who is actually in favor? - and Why?

In conclusion, we find the thermal curtain / increased outflow recommendations found in the SWRCB Draft EIR to be not reasonable, not feasible, not financially viable, not socially acceptable, not culturally sensitive, not environmentally adequate, and definitely NOT WANTED!

Sincerely,

  
Thomas P. Johnston

  
Bridget C. Johnston