

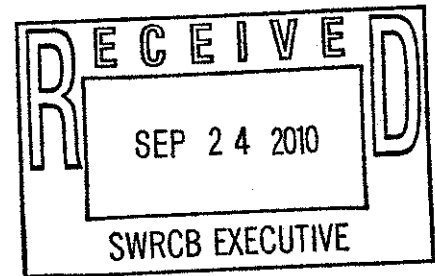
# PLUMAS COUNTY FLOOD CONTROL & WATER CONSERVATION DISTRICT

10/5/10 Bd. Mtg.  
Oroville Facilities  
Deadline: 9/24/10 by 12 noon



September 24, 2010

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



Re: Comment Letter – Oroville Draft Water Quality Certification

Dear Ms. Townsend:

In a previous comment letter, dated August 5, 2009, the County of Plumas expressed concern with the State Board's reliance upon the EIR prepared by the Department of Water Resources (DWR) due to its failure to adequately address climate change impacts in the context of a 50-year license renewal. That issue continues to be our primary concern with the relicensing of the Oroville Facilities and the accompanying water quality certification.

On June 15, 2010, Gary Freeman, principal hydrologist for Pacific Gas and Electric Company, made a climate change presentation in Chester, California, to the Almanor Basin Watershed Advisory Committee and members of the community. The information presented included the following data:

- Over the 50-year span from 1960 to 2009, the trend in the Feather River Basin shows a decrease in average annual runoff of 400,000 acre-feet of water.
- Over the same 50-year period, winter nighttime mean minimum temperatures have increased 6.7°F in the Lake Almanor Basin and 9.2°F in the East Branch watershed of the North Fork Feather River (compared to 2.3°F statewide).
- The April 1 snowpack at the main ski area in the Lake Almanor basin has declined 59% since 1949.

These trends over the past half century further belie the assertions in the EIR that both the weather extremes and the weather variability that have been observed over the past hundred years will "continue for the foreseeable future." It is our understanding that PG&E's data and analysis have been shared with both the Department of Water Resources and the State Water Resources Control Board.

These trends relate directly to the quantity, temperature, and timing of flows and cannot be disregarded in the context of a water quality certification. We do not believe it is sufficient to merely establish numeric targets to meet water quality objectives and then claim the project will

be responsible for compliance. This approach to water quality has clearly failed in so many other places in California. While there may be limits to the State's Board ability or desire to prescribe particular compliance measures, realistic consideration must be given to how the water quality objectives will be achieved, particularly in the face of data showing significant declines in annual runoff and changed timing of flows, as well as the relatively junior water rights of the State Water Project.

While it remains to be seen whether the EIR will be reopened to address climate change issues in a larger context, there are specific conditions that the State Board should impose through the water quality certification:

1. Expand the physically-based modeling that DWR and others have completed in portions of the Feather River system (such as Indian Creek, Last Chance, and the pending Middle Fork project) to cover the entire watershed and develop a full understanding of its current function and the range of options for both project operations and climate change adaptation.
2. Improve operational efficiency through adequate real-time monitoring and data collection for the 2.3 million-acre watershed above Lake Oroville.
3. Require restoration of cold-water habitat above Lake Oroville (even if it is to benefit resident rather than anadromous species) to provide more localized mitigation of habitat losses caused by construction of the project.
4. Improve water quality by implementing the recommendations of ICF Jones & Stokes presented in the May 2008 review of the Plumas Watershed Forum, which was commissioned by DWR and the State Water Project contractors. Among the recommendations:

***Recognize Cost Effectiveness***

Recognize that the upper Feather River watershed restoration program—in the aggregate, including intervention and intervention-support efforts of several organizations—is likely cost effective in augmenting base flow and improving water quality and watershed condition, even considering only market values.

***Increase Intervention Funding***

Increase funding of direct intervention to accelerate the restoration of basin storage capacity and augmentation of base flow but maintain other funding levels as needed to ensure that education/outreach and fuel-reduction activities in the watershed are maintained.

***Revise Feather River Watershed Management Strategy***

The strategy of "increasing upland vegetation cover" in upland areas of the watershed should be refocused to manage natural fuels and reduce the extent and severity of wildland fire while maintaining continuous vegetation cover.

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*Seek Long-Term Funding for the Upper Feather River Watershed*

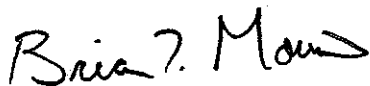
Use initial new Forum funding to develop a long-term funding arrangement involving water users and state and federal agencies such that a multi-decade restoration effort can be sustained.

Similar to the projects of the Plumas Watershed Forum that were lauded by Jones & Stokes, the work undertaken through the Herger-Feinstein Quincy Library Group Forest Recovery Act has shown how water quality and quantity can be protected through climate change adaptation in both forest management and watershed restoration contexts. Researchers from the Forest Service Pacific Southwest Research Station have observed that a significant part of the water loss identified by PG&E is attributable to the overgrown and unnatural state of National Forest System lands and the associated increase in evapotranspiration over the 2 million acres of trees in the Feather River watershed. Not only does reduced groundwater migration lead to reduced baseflows and higher water temperatures, but unnaturally intense and uncontrolled wildfires have direct impacts on water quality and aquatic habitat.

As an example of active management to advance climate change adaptation, there is a stark contrast in watershed conditions surrounding the State Water Project reservoirs at Antelope Lake and Lake Davis. As the attached photographs illustrate, Lake Davis shows the benefits of a restored and well-managed watershed, while Antelope Lake has suffered the consequences of repeated, high intensity wildfires.

Once again, we thank you for the opportunity to comment on this project. If we can provide any additional information, you may always contact me at (530) 283-6243 or [brianmorris@countyofplumas.com](mailto:brianmorris@countyofplumas.com).

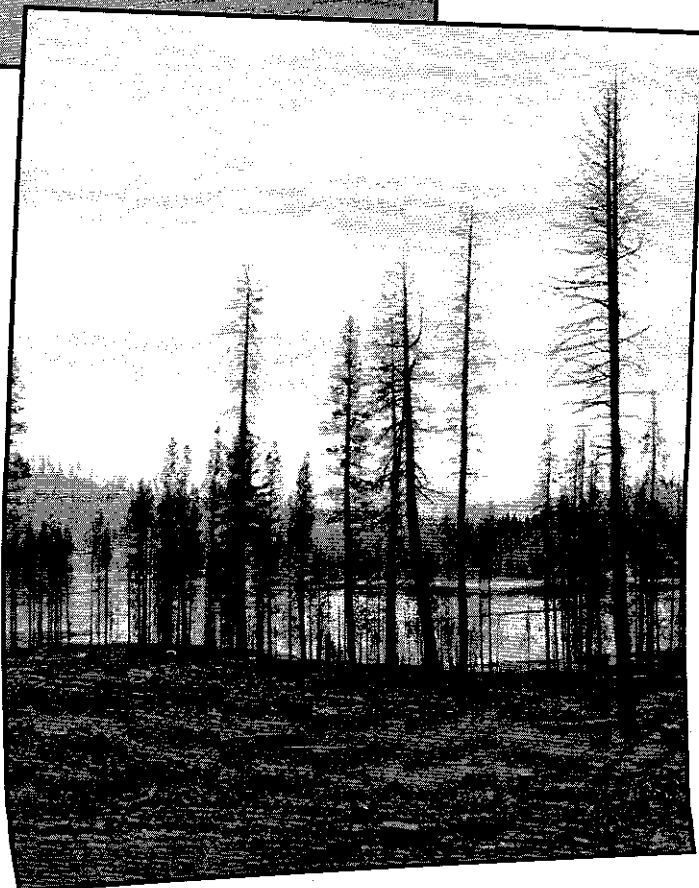
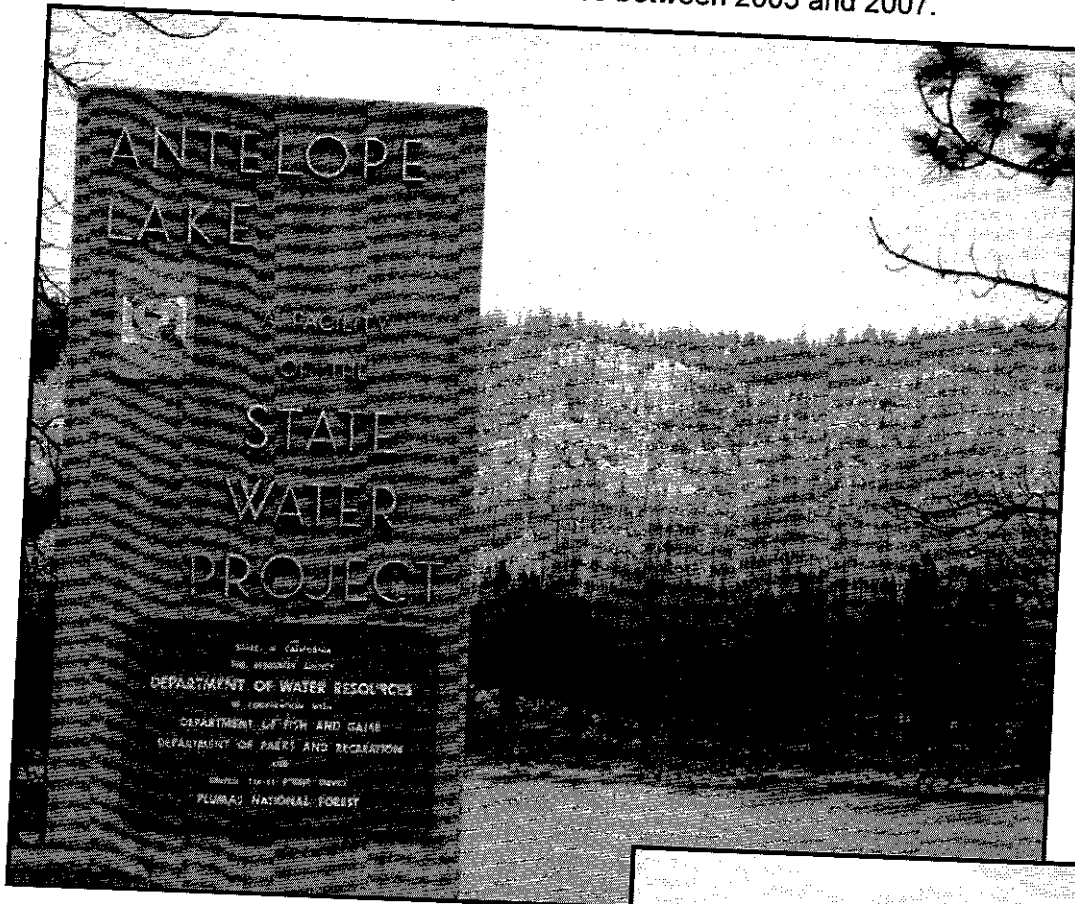
Sincerely,



Brian L. Morris  
General Manager

## State Water Project – Antelope Lake

The Antelope Lake basin in the Feather River watershed has been devastated by repeated, widespread, high-intensity forest fires between 2005 and 2007.



## State Water Project – Lake Davis

Lake Davis, also in the Feather River watershed, is in a relatively protected condition as a result of fuel reduction and watershed management projects implemented over the past 10 years.

