

Forest Service Plumas National Forest

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File Code: 2770

Date: October 5, 2005

Ms. Sharon Stohrer State Water Resources Control Board P.O. Box 2000 Sacramento, CA 95812-2000

Dear Ms. Stohrer:

DIV. OF WATER RIGHTS SACRAMENTO

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Thank you for the opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) on Water Quality Certification for the Upper North Fork Feather River Hydroelectric Project. The Forest Service has a vital interest in the management of water quality (as it will be defined in the Section 401 Water Quality Certification) for the project since National Forest System lands administered by the Forest Service are located within and downstream of the project.

In determining the scope and content of the EIR, it is likely that the project cumulative effects analyses will reveal that project effects reach far downstream. Evaluation of these effects and possible mitigation options will best be accomplished if project alternatives span both within project measures and outside project measures, such as those listed on page 6 of the NOP. For example, modeling conducted by the Pacific Gas and Electric Company (PG&E) has demonstrated that the goal of providing a mean daily water temperature of 20 degrees Celsius or less within the Rock Creek and Cresta reaches cannot be met in many water years. This impact will continue and is cumulative in a downstream direction. Additionally, a statement is made on page 14 of the NOP regarding potential project interference with movement of native or migratory fish or wildlife species. If project features such as dams prevent fish passage, this effect would require mitigation as well. If stream temperature and fish passage cumulative effects, as well as other water quality issues, cannot be fully mitigated within the project, a project alternative that provides in kind mitigation outside the project area should be considered.

If you have any questions please contact Mike Taylor at (530) 532-7427.

Sincerely,

JAMES M. PEÑA

Forest Supervisor



