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STATE WATER RESOURCES
CONTROL BOARD

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DIV OF WATER RIGHTS
SACRAMENTO

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

Subject: Draft Environmental Impact Report (EIR) for Upper North Fork Feather River Hydroelectric Project, FERC 2105; of November 2014

Greetings:

Having reviewed the subject State Water Board document and reflecting on the very long history of the relicensing effort, I feel compelled to state my opposition to the proposed export of Lake Almanor's limited cold water pool. Such a move, by whatever means, would have a serious detrimental impact on both the existing cold water fishery and water quality in general at Lake Almanor, while providing a minimal benefit to the targeted lower Feather River waters many miles downstream. It is incomprehensible to me that a state agency would demand such an environmentally illogical measure.

Instead of taking a holistic, watershed approach to the matter of river fishery temperatures, the scope of the draft EIR is carefully crafted to exclude potential mitigation measures outside of Lake Almanor and Butt Lake. Further, the document gives scant attention to documented recent rises in average air and water temperatures at the site, reflecting the influences of global climate changes and California's ongoing drought. Reducing or eliminating the limited cold water pool at Lake Almanor during the summer will not only destroy habitat for cold water fish there, it will also encourage more frequent and larger algae blooms. And yet the draft EIR casually dismisses all this with a simple declaration of "no significant impact." Really?

There is another underlying concern regarding the tone of the document. The State Water Board takes no responsibility for either the financial or ecological impact of its decision. As a body that seemingly answers to no one, it apparently feels free to issue direction without regard to consequences. The affected utility company (and ultimately the rate payers) will foot the financial bill, and the local environment will suffer the results, while the State Water Board absolves itself from any burdens.

There is no environmental justice in damaging one region for a questionable and unproven improvement elsewhere. There is no credibility in a document that, after a decade of work still lacks clear scientific substantiation, a thorough cost-benefit analysis and peer review. In short, the draft EIR appears to the public to be a political statement, a decree, rather than an unbiased analysis. It simply describes the State Water Board's preconceived position. This would be a comical situation, a farce, were it not for the seriousness of the matter.

Sincerely,



Dale E. Knutsen

Copy to:

Plumas County Supervisor Sherrie Thrall
California State Assemblyman Brian Dahle
California State Senator Ted Gaines
Congressman Doug LaMalfa
Senator Diane Feinstein