



## *MAIDU SUMMIT CONSORTIUM*

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Peter Barnes  
State Water Resources Control Board  
1001 I Street, 14<sup>th</sup> Floor  
Sacramento, CA 95814

Mr. Barnes:

Please accept this letter as the comments of Maidu Summit Consortium regarding the scope and the content of the EIR for the Upper North Fork Feather River Hydroelectric Project (FERC Project 2105).

The Maidu Summit and its member organizations have strongly held concerns regarding the potential impacts to Maidu cultural resources and the human remains of countless generations of our ancestors as the direct result of the proposed Lake Almanor 'thermal curtain' project.

After a careful review of the information contained within this EIR, we find very little in the way of protective measures being considered for such impacts. In fact, there is essentially no mitigation planning for potential cultural resource impacts that would likely occur as the result of 'fill' being introduced to the areas where Maidu cemeteries are known to exist based on previous scoping and other projects done by Pacific Gas & Electric in this exact area.

We recommend that the SWRCB perform new physical surveys of the portions of the lake bed that will have large concrete footings put in place as part of the 'thermal curtain' construction. Those surveys would necessarily include divers or remote visual equipment that would adequately reveal what is there now. This work must be done in conjunction with knowledgeable Maidu cultural representatives that live in the area and who are themselves of Maidu descent. These are the only means for your agency to use in order to accurately assess whether or not NAGPRA law and the CEQA guidelines are being adhered to.

Furthermore, we strongly urge the SWRCB to perform a series of interviews and site tours with the same set of knowledge holders. This is the only way of

ensuring to the Maidu tribe, the People of California, the Federal Energy Regulatory Commission and all the stakeholders in this project, that the remains of Maidu People are not going to be washing ashore at the lake in the abhorrent manner in which they did during previous hydrology projects at this same location.

Apart from the potential for Maidu cultural resource impacts, we also find that the recreational and tourism economy of the Lake Almanor region will be dramatically and negatively effected as the direct result of lowering water temperatures at lower reaches in the watershed by altering the hydrology of sub-surface springs that occur in and around the Prattville area of Lake Almanor. We urge the SWRCB to propose alternatives to this approach, or at very least consider the negative effect this will have on our local and regional economy.

We urge your agency to further study the viability of the alternative measures proposed as part of this EIR to complete project objectives, and ask that new surveys be done to more accurately reflect the real potential for the ghastly outcomes witnessed by the tribe at this site in years gone by.

We also wish to provide the SWRCB staff with new information regarding whether or not we wish to specify the approximate locations for Maidu graves near Prattville. This will be done in the following weeks, as we were invited to do. This, and the proactive research methods proposed in previous paragraphs here will lead to a reasonable level of safeguarding our buried ancestors, regardless the approach decided upon.

The Maidu Summit Consortium has concluded that insufficient information has been used to substantiate the potential for impacts to culturally sensitive resources, the local economy, and to the Maidu People whose ancestors were inundated at Lake Almanor.

Thank you in advance for your solemn consideration of our comments provided in this letter and to all correspondence to follow.

Kind regards,

A handwritten signature in black ink, appearing to read "Ken Holbrook", written in a cursive style.

Kenneth Holbrook

Executive Director

Maidu Summit Consortium