

State Water Resources Control Board
PO Box 2000
Sacramento, CA 95812-2000
Attn: Sharon Stohrer

September 23, 2005

Subject: Comments on NOP for Upper North Fork Feather River Hydroelectric Project

The California Sportfishing Protection Alliance has the following comments on the subject NOP.

1. The California Department of Fish and Game completed a six year study in 1986 on the North Fork Feather River which focused on biological impacts in the Rock Creek-Cresta reach of the river. This report also contains significant data on the temperature relationship and impacts of PG&Es Upper NFFR project. These data should be included in the analysis of impacts and development of alternatives. These data also represent the best scientific data available with regards to cause of temperature impacts on the entire NFFR.
2. Analysis of temperature impacts and benefits as well as costs must include the entire NFFR from Almanor to Oroville as project related or caused impacts extend throughout this entire reach.
3. Water temperature impacts are the result of actions by PG&E, are preventable and are within the control of the licensee. The document should identify the applicable state and federal regulations and the responsibilities of the licensee as well as mitigation to reduce the impacts to less than significant. Mitigation to meet the temperature requirements of the Basin Plan must be provided.
4. Impacts of temperature increases should be analyzed in relation to incidence and prevalence of the fish disease *Ceratomyxa shasta*.
5. Impacts to the movement of avian, aquatic and mammalian species through habitat modification and destruction should be considered as a significant impact.
6. The project has and continues to have a significant adverse impact on the movement of fisheries resources in the North Fork Feather River as well as the Hamilton Branch, Butt Valley Creek and numerous tributary streams. The checklist is incorrect in regards to this issue.
7. The continuing impacts to wetland habitats should be evaluated and mitigation measures implemented to mitigate impacts to less than significant as required by CEQA.
8. Changes to the recreational fishery in terms of species changes as well as loss of recreational use and economic benefits should be included. This must encompass the entire area of impact of increased water temperature. (Almanor to Oroville).
9. The legal and factual basis for consideration of offsite mitigation for water temperature related impacts should be fully evaluated. Any offsite alternative must be fully documented as to its need, relationship to the North fork Feather fisheries, the basis for change in the fisheries objectives in the Rock Creek-Cresta

Project license and Settlement Agreement, and impact to fisheries of the North Fork Feather

10. A water temperature control alternative considering increased flows in the Seneca reach (400-500 cfs) along with reduced diversions to Caribou 2 powerhouse should be considered and modeled. This should include isolation and separation (using a curtain wall or permanent structure) of cold water flows from the North Fork through Belden Forebay, Rock Creek and Cresta Reservoirs.
11. Genetic analysis of Brown trout stocks in Lake Almanor, Butt Valley Creek and Reservoir should be completed to identify if any variation in these stocks occurs. This analysis should be compared to other stocks to determine if the claimed differences in fact exist to warrant separate management and impact consideration.

Jerry Mensch for
California Sportfishing Protection alliance
1248 E. Oak Ave.
Woodland CA 95695