



PLANNING DEPARTMENT COUNTY OF TEHAMA

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Sean M. Moore, AICP
Director of Planning

December 4, 2014

STATE WATER RESOURCES CONTROL BOARD
Division of Water Rights
P.O. Box 2000
Sacramento, CA 95812-2000
ATTN: Michelle Lobo

RE: LASSEN LODGE HYDROELECTRIC PROJECT NO. 12496-000

Dear Michelle Lobo:

Tehama County has reviewed the 1,800 plus page FERC application, Environmental Report and the attached appendices for a license to establish and operate a 5 megawatt (MW) hydropower facility sited on the upper South Fork Battle Creek, approximately 1.5 miles west of the town of Mineral, an unincorporated community in Tehama County, California.

The Project is located primarily on the south bank of South Fork Battle Creek between elevations of 3,417 feet and 4,310 feet above mean sea level. Power generated from the Project will be transmitted by a new, approximately 12-mile-long, 60 kV transmission line ranging in elevation from 3,470 feet at the generation substation climbing up to a maximum elevation of 4,422 feet then down to the low point of the transmission line at an elevation of approximately 2,105 feet, where it interconnects with the Pacific Gas and Electric (PG&E) Volta – South Transmission line in the town of Manton, California.

The Environmental Report has identified significant impacts associated with both the construction and operational aspects of the Project. Specifically lacking in the Environmental Report is a grading plan identifying the cut/fill points of all components of the Project. Grading will be required for the development of the intake/outlet areas, pipeline, roadways and transmission lines. Without an accurate and fully dimensioned grading plan, BMPs for individual Project segments are not identifiable and an environmental assessment of the grading would at best be subjective. In a letter dated


August 22, 2012, to complete the application, the Planning Department required the submittal of "Larger scale maps for power line alignment and area of pen stock alignment including grading plans per Public Works requirements pursuant to Chapter 9.43 of the Tehama County Code pertaining to grading and erosion control." The grading plan has not been submitted to the County per our request.

Other Significant Impacts

- Project may significantly impact the County's existing recreational opportunities contrary to the Tehama County General Plan Economic Development Element.
- Project may significantly impact areas identified as critical riparian zones contrary to the Tehama County General Plan Open Space and Conservation Element.
- Project may significantly impact the ability to protect fish populations and ensure adequate flow levels for spawning activity contrary to policies and implementation measures of the Tehama County General Plan Open Space and Conservation Element.
- Project may significantly impact fisheries, specifically trout and protected salmon.
- Project may significantly contribute to the aesthetic degradation of the Project site.

The information provided as part of the FERC application provides substantial evidence that the Project will result in significant impacts and necessitate the preparation of an Environment Impact Report (EIR). Therefore, the County of Tehama is requesting that the State Water Resources Control Board prepare an EIR.

Respectfully,



Sean M. Moore, AICP
Director of Planning
Tehama County, CA