

March 20, 2015

Peter Barnes
State Water Resources Control Board
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Re: Upper North Fork Feather River Hydroelectric Project Draft EIR

To Whom it May Concern:

Although I am using a generic message as a basis for some of this message, I am augmenting it with various of my concerns as a biologist, as well as deleting some of its content as rather secondary to my concerns about the natural history of the area being affected. I am a tax-paying resident of Plumas County, writing to express my concerns regarding the State Water Resources Control Board's Upper North Fork Feather River Hydroelectric Project Draft Environmental Impact Report ("EIR").¹ In general, I find the EIR unconvincing in its arguments for the need to use Lake Almanor waters to cool downstream fisheries. Lake Almanor has been operated for the last 50-some years as a hydroelectric project. The environment and community has adjusted to this. In 2004, PG&E, Plumas County, and other stakeholders held extensive negotiations and developed a settlement agreement, which provided more cold water flows down the river while maintaining sufficient cold water and suitable lake levels at Lake Almanor so that its environmental benefits would be maintained, both for the lake's biota and surrounding natural and public lands, and their use. Now, the EIR is considering two project "alternatives" that involve thermal curtains and even more water releases, which would significantly affect, and perhaps destabilize, Lake Almanor's ecosystem. Why are *any* alternatives necessary when the proposal to operate per the settlement already provides beneficial changes that cool the river downstream?

Those that live in and visit Plumas County value the natural resources of Lake Almanor. The EIR's thermal curtain and increased cold water outflow alternatives may significantly impact the fisheries, visual beauty, and seasonal tourist attraction of Lake Almanor. The EIR alternatives may result in large declines of the desired kinds of fish for which the area is famous, likely to be replaced by less desirable, warmer-water tolerant fish. Why would the State Water Board consider alternatives that will harm Lake Almanor's beneficial uses by draining the lake of its cold water? In view of the currently harsh effects already taking place, due to global warming, particularly in western North America, this is unwise policy.

The EIR has not presented convincing data regarding the status of downstream fisheries. On one hand, it's not clear that downstream fisheries have declined, and cannot adapt to slightly warmer temperatures than the magic temperature level indicated to sustain them. On the other hand, if those fisheries are so vulnerable, then, in view of global warming trends in western North America, the increased cold water

¹ The EIR is available online at:

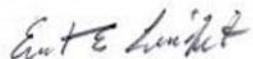
http://www.swrcb.ca.gov/waterrights/water_issues/programs/water_quality_cert/unffr_ferc2105_eir.shtml

releases from Lake Almanor is a band-aid action that will not be sufficient in the long term, and in turn will hasten irreversible harm to the Lake Almanor ecosystem in turn - a long-term, lose/lose situation.

The EIR also fails to evaluate the recreational economy that is tied to the Lake Almanor fisheries – an important economic driver in this region. Negative effects to the kinds of fish desired for angling will also harm the community, as fewer people come to visit and fish the lake. This may result in closed and abandoned businesses and homes, and declining funds for public services that benefit Plumas County and its residents. The EIR should not ignore this aspect of the issue.

I request that you reject the thermal curtain / increased release alternatives, and safeguard the current ecosystem of Lake Almanor and its benefit to the surrounding community.

Sincerely,



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