Peter Barnes, Engineering Geologist

State Water Resources Control Board

Division of Water Rights

Water Quality Certification Program

P.O. Box 2000

Sacramento, CA 95812

SUBJECT: Response to DEIR for the Upper Feather River Hydroelectric Project, FERC No. 2105

Dear Mr. Barnes,

This is to state my concerns regarding the lack of adequate discussion concerning the cold water salmonid fishery in Lake Almanor and the impact that the staff recommendations for removing cold water from Lake Almanor will have on this fishery.

As documented in the accompanying figures, since the introduction of the dam in 1914, there has been an active salmonid fishery which has annually produced large fish into the 21st Century. The figures were contributed by local residents and are labeled with actual or approximate dates. They illustrate that large trout have been caught 22 years after the dam was completed (1936). This has continued up until the present (2007). Indeed, the Department of Fish and Wildlife has recorded capture of spawning trout as illustrated for the early 1970s.

The DEIR does not:

- Address with up-to-date data the conditions of the cold water fish habitat in Lake Almanor. Data from the Lake Almanor Watershed Group for years 2009 to 2014 substantiate that climate conditions over that period have severely compromised salmonid habitat.
- 2) Provide a detailed and comprehensive plan for monitoring water conditions related to salmonid reproduction.
- 3) Provide a detailed and comprehensive plan for monitoring the reproductive success of the resident actively reproducing salmonid populations.
- 4) Define the impact of reducing the current percentage of lake water which is cold enough to produce adequate salmonid habitat through the proposed releases via the Canyon Dam drainage or removal through the thermal current.
- 5) Provide detailed and adequate remediation strategies for maintaining or enhancing the currently actively reproducing cold water fish population.

Sincerely,

Charles G. Plopper

Phoppe

Lake Almanor Cold Water Salmonid Fishery



1936



Early 1940s





1968-69



DFW w/ spawning, trout early 1970s



Early 1990s



2007

1964