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November 15, 2022

VIA ELECTRONIC SUBMITTAL

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Pacific Gas and Electric (PG&E) Company
Power Generation
Janet Walther
12840 Bill Clark Way
Auburn, CA 95602

**RE: Plumas County Comments
Rock Creek-Cresta Project (FERC No. 1962)
License Condition No. 4.D Additional Reasonable Water Temperature Control
Measures Report (DRAFT October 2022)**

Dear Ms. Walther,

Plumas County (Plumas) appreciates the opportunity to provide comments on the DRAFT October 2022 License Condition No. 4.D Additional Reasonable Water Temperature Control Measures Report (Report). Plumas recognizes PG&E drafted the Report pursuant to Article 401 and Forest Service Condition No. 4.D from the Appendix of the Order Approving Settlement and Issuing New License for the Rock Creek-Cresta Project (FERC No. 1962) on October 24, 2001, as well as ordering paragraph (D) of FERC's February 28, 2003 Order Modifying and Approving Water Temperature Monitoring Plan Under Article 401.

As stated in the May 18, 2021, letter from FERC to PG&E, the Report is required to evaluate whether mean daily water temperatures of 20 degrees Celsius (°C) or less have been or will be achieved within the Rock Creek and Cresta reaches, and if not, whether additional reasonable water temperature control measures are available. Further, the Report is required to include recommendations for the implementation of any such measures and must also factor in economic considerations in evaluating whether additional temperature control measures are reasonable.

Plumas, as a consulting member of the Rock Creek-Cresta (RCC) Ecological Resources Committee (ERC), beginning in early 2021, has participated in numerous RCC ERC meetings to discuss PG&E's Plan and Schedule to prepare the draft Report. All the while, Plumas understands PG&E has continued to implement the Interim Temperature Control Measures Plan (April 30, 2012) (Interim Plan), and will do so, until such time the final Report is completed and filed with FERC, which is scheduled to occur by December 31, 2022.

Plumas submits the following formal comments as a member of the ERC in response to the DRAFT October 2022 Report:

1. NO REASONABLE CONTROL MEASURES AVAILABLE

Plumas shares the concerns of PG&E and recognizes the Executive Summary of the DRAFT Report concludes that “no reasonable control measures are available...” and that “PG&E recommends ceasing implementation of the interim water temperature control measures and investing no further effort or resources to address this objective.”

Plumas firmly agrees with PG&E’s recommendation to cease implementation of the interim water control measures and that no additional time or money should be spent on water temperature monitoring or evaluating further measures or alternatives.

Plumas does not support in any way the implementation of additional water temperature control measures that are scientifically unproven or have the potential to negatively impact ecological life and/or significantly diminish aquatic resources, including the cold freshwater habitat and fisheries and recreational and economic values of Lake Almanor and Butt Valley Reservoir.

Moreover, Plumas emphatically rejects any water temperature control measure alternatives that would involve capital projects such as the use of thermal curtains or other means or modifications at the Prattville intake structure or increasing the magnitude of seasonal water releases using the low-level gates in the Canyon Dam outlet structure and any changes to project operations on the Upper North Fork Feather River FERC Project No. 2105.

2. ECONOMIC IMPACT CONSIDERATIONS

While the DRAFT Report does state PG&E evaluated economic factors, such as construction and implementation costs and potential impacts to water quality and fisheries, the analysis falls short of the complete consideration of economic impacts to the Plumas County economy, and specifically the Lake Almanor Basin FERC Project No. 2105 area, in evaluating whether additional temperature control measures are reasonable.

Plumas cannot underscore enough the dire economic consequences should the degradation of Lake Almanor occur due to the loss of cold freshwater habitat, fisheries, wildlife habitat, and recreation. The Lake Almanor Basin represents 42% of all assessed secured properties in Plumas County worth approximately \$1.85 billion dollars, with residential secured properties representing 93% of this value.

Should property tax revenues decrease between 30% and 40%, and tax revenues, including transit occupancy taxes, from business activities driven by fisheries and tourism-related industries decrease between 40% and 50%, it would represent a significant decrease of between \$5 to \$6.5 million dollars annually for Plumas County, or a 10% percent decrease in annual County revenue.

Forty-one percent of those employed in the Basin work in industries directly dependent and affected by the quality of the environment and the ecology of Lake Almanor, and peak recreation-based tourism employment is in the summer months.

Any detrimental effects to the Lake would have a direct impact on unemployment and would cause an increase in County services, particularly as it relates to the public health, welfare, and government assistance; and 39% percent of Plumas County's expenditures are in these three categories.

3. LANGUAGE CLARIFICATION

Appendix A to the Rock Creek-Cresta Relicensing Settlement Agreement, dated December 6, 2020, provides the Water Temperature Requirement, as follows: "In order to reasonably protect cold freshwater habitat, Licensee shall maintain mean daily water temperatures of 20 degrees Celsius or less in the Rock Creek and Cresta Reaches, to the extent that Licensee can reasonably control such temperatures." Throughout the DRAFT Report, Plumas notes the word "contain" or a form thereof is used instead of the word "maintain" and suggests tying the language directly and accurately to the Water Temperature Requirement. Additionally, the Water Temperature Requirement states, "mean daily water temperatures" and Plumas notes this phrase is also sometimes mischaracterized in the DRAFT Report.

4. LANGUAGE CLARIFICATION

Plumas notes the last sentence of the first paragraph in the Executive Summary, as follows: "The purpose of achieving a mean daily water temperature of 20°C or less is to enhance cold-water fish habitat, primarily for trout." Although, the Water Temperature Requirement reads: "In order to reasonably protect cold freshwater habitat."

In closing, the Plumas County Board of Supervisors holds firm to the County's position of no adverse effects on beneficial uses for areas within FERC Project No. 2105 including Lake Almanor, Seneca Reach, Canyon Dam, Prattville Intake, Butt Valley Reservoir, and Caribou 1 and Caribou 2 Powerhouses. Plumas reiterates beneficial uses of greatest importance to the County include cold freshwater habitat, fisheries, wildlife habitat, and recreation. The interests of the entire County rest in improving water quality and forest health, advancing the quality of life for residents, increasing economic prosperity, supporting tourism and local businesses, preserving property values, and maintaining access to recreational amenities.

Sincerely,



Kevin Goss
Chair, Board of Supervisors

cc: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission
Doug LaMalfa, Congressional District 1
Brian Dahle, Senate District 1
Megan Dahle, Assembly District 1
Board of Supervisors, Plumas
Gretchen Stuhr, County Counsel