ORIGINAL

11-20-04

Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

(Attn: FERC Project 2105)

Dear Federal Energy Regulatory Commission,

I am very disturbed to learn of PG&E's plan to install "thermal curtains" on Lake Almanor and Butt Lake as part of the FERC Project 2105 relicensing. I believe that such a move would cause major environmental harm to those lakes while providing only a very minor improvement to trout habitat further downstream. I am therefore asking for your help in putting a stop to this plan.

## Points:

- No historical evidence has yet been presented that proves that the downstream summertime water temperatures were cooler before dams or power facilities were installed.
- No evidence has been presented to indicate that there are significant trout kills in the downstream waters due to high water temperatures.
- PG&E's studies indicate that the proposed thermal curtain approach will not reduce the downstream waters during "dry" or "critically dry" water years, when temperature reductions would be most needed for trout wellbeing
- Their studies also indicate that during "normal" or "wet" years, the thermal curtain approach will typically only reduce the downstream water temperature by one (1) degree Celsius.
- The estimate of installation costs keeps rising, with the latest figures now greater than \$50 million
- Dredging will be required at Lake Almanor as part of the thermal curtain installation.
   There are serious concerns that such dredging may desecrate ancient Maidu burial sites known to exist under the lake.
- Once the thermal curtain system is in operation, it will:
  - Greatly reduce the cold water pool at Lake Almanor, reducing the habitat there for trout
  - Alter the current passage of pond smelt between Lake Almanor and Butt Valley Reservoir, upsetting the food chain
  - Basically eliminate Butt Valley Reservoir as a trophy trout fishery
  - Create a hazard to navigation on Lake Almanor, increasing the risk of boater injury



## Points Continued:

- Additional adverse impacts on water quality are suspected but not yet fully
  defined because studies have not been done. These potential impacts
  include increased algae bloom and increases in waterborne bacteria
  levels (e.g., "swimmers' itch") due to increased summertime water
  temperatures in the lakes.
- Improving the downstream trout habitat can be accomplished through methods other than extracting the cold water from Lake Almanor.

Sincerely,

Ken Leonard

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