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September 27, 2004

Federal Energy Regulatory Commission ATTN: FERC Project 2105 888 First Street, NE Washington, DC 20426 OFFICE OF THE SECRETARY 2004 OCT -4 P 4: 32 REGULATORY COMMISSION

Gentlemen:

Several years ago, as part of the relicensing of PG&E facilities on a lower stretch of the North Fork of the Feather River (NFFR), (FERC Project 1962), the company agreed to maintain average river water temperatures of 20 degrees Celsius (68 degrees Fahrenheit) or less in what is known as the Rock Creek-Cresta Reach of the NFFR. This was intended to enhance the trout habitat in that region, where summertime water temperatures can exceed 20 degrees Celsius. The FERC Project 1962 relicensing agreement stipulates that this water temperature requirement applies to the NFFR between Rock Creek Dam and Cresta Power House 'to the extent that Licensee (PG&E) can reasonably control such temperatures.'

Pacific Gas & Electric Company is currently in the final stages of renewing its license with the Federal Energy Regulatory Commission (FERC) for its hydroelectric power generation facilities on the upper reaches of the North Fork of the Feather River (NFFR). This multi-year effort, known as FERC Project 2105, has dealt with a variety of issues, most of which have been successfully reconciled and settled. But a few months ago, almost as an "Oh, by the way ..." matter, PG&E noted that there would likely be a change in the way that water was handled from the upper mountain lakes in the system, to allow PG&E to satisfy a water temperature requirement stemming from an earlier relicensing of its facilities on a lower reach of the NFFR.

I have a difficult time understanding why (you?) and PG&E think thermal curtains in Lake Almanor and Butt Lake will actually provide sufficiently cooler water to the Rock Creek-La Cresta Reach to maintain July-August-September temperatures below 20 degrees C. The study data do not support the viability of such a project.

Trading the potential to destroy the Lake Almanor trout fisheries for an experiment to determine if the thermal curtains can make a few miles of The North Fork of the Feather River one degree cooler during the hottest months of the year is absurd.

The proposed costs for such a low-probability-of-success experiment are overwhelming. These may be "government" mandated projects, but "we the people" pay for them. There are many better projects for which our money should be spent.

Please do not allow this project to proceed.

Sincerely.

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