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January 25, 2005

Ms. Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Comments on Scoping Document 1 and Pacific Gas and Electric's Pre-Application Document for the DeSabra-Centerville Hydroelectric Project (FERC Project 803)

Dear Ms. Salas:

The Chico Paddleheads, a local canoe and kayak club, appreciates the opportunity to comment on the above documents. I concur with many of the comments that we have seen from other organizations and from fellow paddlehead member Roland McNutt. I have extensive comments on the document, but I will summarize a few of them below:

- The FERC process can be complex, yet we hope that this ILP will proceed in a clear, manner with attention paid to encouraging citizen comments. The barrage of emails earlier this year from PG&E was confusing. I suggest that future correspondence be organized in a simple, consistent, condensed fashion and when citizens can intervene (and how). We should be able to tell in a matter of seconds, the significance and subject of correspondence without being overwhelmed with duplicate postings.
- The time to properly review the PAD and prepare a response was extremely short without some of the critical information required for a proper review; we hope that this is extended in the future to allow concerned (and busy) citizens enough time to respond.
- We feel strongly that the impacts of the project need to be evaluated with the rigor of an EIS and not just an EA. For example, even the PAD notes, Butte Creek is one of only three streams in Central California that supports a self-sustaining populations of Spring Chinook Salmon. Clearly, an EIS is required for a variety of reasons.

- We would like to see a cost benefit analysis that encompasses the ecological costs to fisheries and the river outweigh the benefits of power generation and the comparison to alternative sources (including conservation efforts).
- The project has significant impacts below the project area. We find the project area narrowly defined and would like to see a compelling explanation of why the lower part of Butte Creek and the West Branch of the Feather are not included in the project.
- Chico Paddleheads are particularly concerned about recreational access, both now and into the future, to the river and to the trails used in the area. The information on state trends provides an interesting context, but Butte Creek and the WBFR are incredibly important to local citizens, and use is often confounded by limited or variable access and potential conflicts with local landowners. Good data and long-term solutions that are durable (past the life of the project) are extremely important.
- Although the documentation in the PAD is extensive and helps compile the information, in many sections significant data gaps must be filled before we can make informed decisions on the alternatives, yet PG&E notes in several places that "Licensee does not anticipate gathering additional information."
- Temperature is a critical factor on the system, we support additional temperature gauges on Butte Creek (especially in the low water section) and on the WBFR below the diversion (to assess the impacts of dewatering the WBFR).
- The salmon kills over the past few years are of significant concern, temperature certainly plays a role, but flows are also important for flushing away potential pathogens and increase the wetted perimeter (lowers relative fish density). I see limited information in the PAD to address this issue. We propose that PG&E develop a systematic evaluation of temperature and water flows to examine the potential to improve conditions in the area between Centerville Dam and the Powerhouse). This should include an assessment of water quality and biological parameters (e.g. are pathogens and contaminants flushed away?).
- We are puzzled about the vague statement about USFS involvement. Does a nexus exist between the USFS and whitewater boating opportunities or not? The licensee does not propose to collect additional information. If this nexus is not known, then why? We feel that there is a nexus with USFS, and they need to be a part of the discussion.
- Eventually the project will be decommissioned. PG&E, its shareholders, and customers are receiving the benefit from this public resource; they should shoulder the costs of its eventual restoration, yet I see nothing in the document that addresses this issue. How will PG&E fund the eventual decommissioning of the project? What are the financial costs and ecological consequences? Who

will pay for it? Will the taxpayers be left holding the bag? How will ecological impacts be addressed?

- Along similar lines will comprehensive evaluations been made of the various structures along the project (especially ones that may have severe consequences if they fail).
- What is the sediment budget in the entire basin including the load behind all structures (not just in the canals)? What are the costs of remedying this? What is the pollutant burden in these sediments? I find the proposed sediment and erosion studies lacking. What of the potential and consequences of failure of all structures?
- Fish are an important part of information for this license, and we support efforts to collect scientifically sound data that will help make good decisions for the project. We would like to see better information not only on fish population numbers, but also in the distribution of them and additional information for aquatic invertebrates. For example, if fish numbers (or fish kill numbers) are higher between the Centerville powerhouse and dam that is critical information that suggests additional studies in particular areas. We would also like to see additional fish information below the diversions on the WBFR.
- I did not see any proposed any protection, mitigation or enhancement measures in the PAD for the Project. It seems conceivable that PG&E should have some in mind, and this information may suggest potential studies.

Thank you for the opportunity to respond. If you need any clarification, please do not hesitate to contact us.

Sincerely,

Dan Efseaff, Member, Chico Paddleheads

Which Smoek, President, Chico Paddleheads

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