



March 25, 2015

Peter Barnes, Engineering Geologist
State Water Resources Control Board
Division of Water Rights
Water Quality Certification Program
P.O. Box 2000
Sacramento, CA 95812-2000
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**RE: Upper North Fork Feather River Hydroelectric Project Draft Environmental Impact Report,
November 2014. FERC Project #2105**

Dear Mr. Barnes:

The following comments on the Upper North Fork Feather River Hydroelectric Project Draft Environmental Impact Report are provided by the Plumas Audubon Society based on our 5-year scientific study of *Aechmophorus grebes* (grebes) nesting on Lake Almanor. Our long-term data show 95% correlation between grebe reproductive success and the rate of drop in water surface elevation.

Of the 22 grebe species worldwide, two have gone extinct in the past 30 years, two are on the brink of extinction, and three others are threatened by extinction. On Lake Almanor, the impact of declines in water surface elevation greater than -0.06 (0.72 inches/day) from June 25 through September 15 would contribute significantly to the continued decline of Western and Clark's Grebe and their eventual listing as threatened or endangered. The UNFFR EIR must specify acceptable rates for reducing the water surface elevation during the grebe breeding season to prevent take of thousands of grebe nests a year.

The grebe genus *Aechmophorus* includes only the Western (*A. occidentalis*) and Clark's (*A. clarkia*) Grebes, sympatric species with nearly identical natural histories that breed in western North America. *Aechmophorus* grebes build floating nests of aquatic vegetation and thus are affected by fluctuating water levels on managed reservoirs.

The number of breeding grebes on Lake Almanor has steadily increased over the last decade. Lake Almanor, Eagle Lake, and Clear Lake are the three major grebe breeding areas in northern California comprising more than 90% of breeding grebes in California and 45% of those in the intermountain west. In the last 3 years, Lake Almanor has supported approximately 35% of the breeding *Aechmophorus* grebes in California, making it a critical breeding area for these declining species.

We have attached documentation of our results.

Sincerely,

David Arsenault
Executive Director
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