

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

Pacific Gas and Electric Company,)
Poe Hydroelectric Project) P-2107-016

**ADDITIONAL STUDY REQUEST BY BUTTE COUNTY REGARDING RECREATIONAL
BOATING DEMAND ON PROJECT REACH**

In response to the “Notice of Application Tendered for Filing with the Commission, Soliciting Additional Study Requests, and Establishing Procedural Schedule for Relicensing and a Deadline for Submission of Final Amendments” (Dec. 24, 2003), Butte County hereby files an Additional Study Request regarding potential demand for recreational boating on the project reach. We organize this request consistent with the format of 18 C.F.R. § 4.38(b)(4).

1. **Determination that an Additional Study is Necessary.** . Butte County requests an additional study to estimate potential demand for recreational boating on the 8-mile bypass reach of the North Fork Feather River, over the term of the New License.

2. **Basis for Determination.** The New License Application (NLA) does not propose a release of a recreational flow schedule.

3. The Licensee conducted a recreational flow study May 19-21, 2000. The study was intended to identify the minimum and optimum flows for recreational boating, establish the comparative difficulty of rapids at different flows, and evaluate access locations and public safety. NLA, Report E5-258. Fourteen boaters participated in a 3-day study at flows ranging from 495 cfs to 1,400 cfs. They then completed comparative surveys. *Id.*, E5-281 *et seq.* They were asked their intent to return if recreational flows are provided in the New License.

Id., E5-316.

4. Participating boaters were “unanimous in their desire to return to the upper reach [Poe Dam to Bardees Bar] at all flow rates.” Report E5-323. The survey results for the lower reach, Bardees Bar to Big Bend Dam, were mixed at the lower test flows, although the rating was “totally acceptable” at the higher such flows. *Id.*, E5-324. The ratings of the project reach ranged from “average” to “among the best” in the region. *Id.*, E5-326. The project reach offers Class III to V difficulty in the “highly scenic, rugged Feather River canyon.” *Id.*, E5-320. The study finds that “there are no developed or planned recreational facilities in the Project area” (*id.*, E5-320), and that toilet and garbage services at Sandy Beach and Poe Powerhouse would be needed to support recreational boating. *Id.*

5. The New License Application does not estimate potential demand if recreational flows and facilities are provided in the New License. It finds that such potential is partly a function of recreational enhancements on the Rock Creek-Cresta Project (P-1962) and North Forth Feather Project (P-2105) (*see* Report E5-327), although it does not evaluate opportunities for integrated flow schedules and facilities (such as access trails) across the three projects. It concludes:

“If a supplemental flow schedule is proposed by the Licensee, it would need to consider the interactions and potential benefits of any coordinated efforts to provide whitewater boating opportunities in the NFFR canyon. Such factors as timing, proximity, and difficulty of potential whitewater runs should be evaluated in related to boater demand, project operations, and environmental considerations.”

Id., E5-328.

6. In the implementation of the Settlement and New License for the Rock Creek-Cresta Project, PG&E has monitored actual use by whitewater boaters, anglers, and other recreational users in the summers of 2002 and 2003. Recreational flow releases typically

occurred one weekend per month from June through October. Flows on each of the Rock Creek and Cresta reaches ranged from 1,000 cfs to 1,600 cfs. Boating use ranged from 250 to 500 user-visits per day.

7. **Resource Objective.** The additional study will assist in the selection of measures to attain the beneficial use of Contact Recreation (REC-1), as designated for the project reach in the Water Quality Control Plan. *See* Letter from Sharon Stohrer, State Water Resources Control Board (SWRCB) (Nov. 19, 2003), p. 6, *set forth* in NLA, App. E5-1.

8. **Methodology.** The objectives of the additional study are to: (A) estimate potential demand for whitewater recreation in the project reach and the resulting socio-economic impacts, and specifically, evaluate whether potential demand is comparable to actual use in the Rock Creek-Cresta Project; (B) evaluate measures to create “a linked system of boatable reaches” from Lake Almanor to Poe Powerhouse (see Letter from Harry Williamson, U.S. Department of Interior (Nov. 7, 2003), p. 2, *set forth* in NLA, App. E5-1); and (C) evaluate whether the facility enhancements proposed by PG&E (*see* Report E5, Table E5.4-1) will be adequate for the potential demand.

9. The additional study will consist of a survey of boating use of the project reach at several dates from July through September 2004.

A. The exact dates will be chosen to minimize loss in energy value, avoid adverse impacts on foothill yellow-legged frog, coordinate with the recreational flow releases in the upstream projects, and avoid conflicts with other recreational user groups and regional events. The dates will be advertised efficiently, including notice on web sites used by the boating community.

B. Boaters at put-in and take-out locations will be surveyed for various facts

pertinent to estimating potential demand and the resulting socio-economic impacts. These include: area of origin, intent to return if recreational flows are provided, willingness to pay user-fees for recreational enhancements, and lodging and other expenditures in the local area. The method will be adequate to estimate whether the use of this reach is likely to increase regional demand for such recreational opportunities or instead relocate existing use on other rivers.

10. The additional study will also evaluate the adequacy of the facility enhancements at access locations, as proposed in NLA, Table E5.4-1, if recreational flows are provided. This needs assessment will include: parking for personal vehicles as well as the buses or vans which may be used for commercial boating, loading or unloading of boating equipment, placement of emergency information kiosks, and safety patrols.

11. The additional study will evaluate measures to create a linked system of boatable reaches from Lake Almanor to Poe Powerhouse, as requested by the National Park Service. This will take into account: (A) the measures required by the New License for the Rock Creek-Cresta Project and (B) measures in any settlement in the relicensing proceeding for the North Fork Feather Project.

12. The study work plan will be developed by PG&E in consultation with Butte and Plumas Counties; federal agencies, including the Forest Service and National Park Service; State agencies, including CalTrans, California Highway Patrol, and SWRCB; and boating interests, including American Whitewater.

13. **Use of Additional Study Results.** These results will materially assist in two decisions: (A) whether the potential demand for recreational boating on this project reach is sufficiently large to provide a net public benefit, net of any cost to PG&E and its ratepayers; and (B) whether the facility enhancements proposed in NLA Table E5-4.1 will be adequate to meet

this potential demand.

14. **Responses to Existing Study Requests.** Butte County notes that PG&E did not specifically respond to or act on several related study requests that the National Park Service and SWRCB filed in response to the Draft License Application, as cited in paragraphs 7 and 8 above. We request that PG&E, these agencies, and other interested stakeholders discuss this and other study requests in the ongoing collaborative process.

SERVICE

Butte County respectfully requests service on the following representatives:

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Dated: February 17, 2004

Respectfully submitted,

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On behalf of BUTTE COUNTY DISTRICT ATTORNEY
and BUTTE COUNTY COUNSEL

DECLARATION OF SERVICE

Pacific Gas and Electric Company, Poe Hydroelectric Project (P-2107-016)

I, Katherine Ridolfi, declare that I today served the attached “**ADDITIONAL STUDY REQUEST BY BUTTE COUNTY REGARDING RECREATIONAL BOATING DEMAND ON PROJECT REACH,**” by first-class mail to each person on the official service list compiled by the Secretary in this proceeding.

Dated: February 17, 2004

By: _____
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