

Mr. Lester Snow
December 7, 1998
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December 7, 1998

Mr. Lester Snow
Executive Director
CALFED Bay-Delta
1416 Ninth Street #1155
Sacramento, CA 95814

Subj: Proposal 98-A1004, Opening Up Butte Creek Canyon to Salmon and Steelhead Passage

Dear Mr. Snow:

I am writing you to advise that Pacific Gas and Electric Company (PG&E) does not support CALFED funding as requested for the subject proposal by the Institute for Fisheries Resources (IFR). Our objections are based on mis-characterization of PG&E's position within the proposal, misleading or false information in the proposal, the wisdom of introducing species to new habitat, and shortfalls of the CALFED process with regard to involvement of stakeholders during development of proposals. Specific detailed comments on the proposal itself are attached.

PG&E was not aware the proposal was being made to the CALFED Ecosystem Roundtable on October 28 until a short time before that meeting when a third party advised us of the proposal and hearing. We did have a representative at that meeting who advised the Roundtable that PG&E was not supportive of the request. Subsequently, PG&E representatives attended a hastily-arranged public meeting for stakeholders of upper Butte Creek on November 3 in the community of Magalia during which an array of objections were raised ranging from gold mining impacts to concern over degradation of the beautiful natural cascades and falls that currently exist along the stream in order to provide passage for anadromous species.

While the proposal ostensibly is to evaluate barrier passage, it presumes access to the upstream reaches of Butte Creek for spring-run chinook and steelhead as a foregone conclusion. Such an introduction to areas where the species have not been present carries with it redirected impacts. The very notion of introducing new species to the upper stream reaches needs serious study and evaluation of all potential impacts before consideration should be given to expending public funds to assess feasibility.

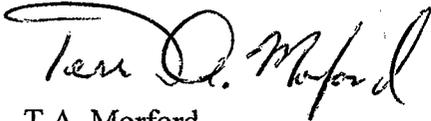
The CALFED process through which this proposal was generated has some serious shortfalls with regard to involvement of stakeholders and the public along the way. As was evident at the public meeting held November 3, there are a variety of valid reasons that argue against introduction of the anadromous species into the upper watershed. However, the absence of a mechanism or requirement to

acquire that input and include it unfiltered in proposals such as this ultimately results in CALFED unwittingly expending public funds for projects that may be doomed in the long run from the outset.

It is our recommendation that CALFED funding not be provided for this proposed study, and withdrawn if it has been tentatively approved. Studies such as this with their potential ramifications demand that involvement of the public and affected stakeholders be taken into account. Certainly PG&E would want to be involved, and we presume that same desire exists on the part of other stakeholders. Applicants would be well-advised to seek that involvement when developing proposals for funding to assure that there are not issues down the road that would ultimately obviate the value of funding and performing such work.

Thank you for your consideration. We trust our feedback will assist CALFED in improving its processes for distribution of public funds and assure efforts are focused where they have high value and potential for ultimate success.

Sincerely,



T.A. Morford
Manager, Hydro Generation

JRO:jo

Attachment

cc: CABolger
JROscamou
JMWalther
Fred Davis, Butte Co. Board of Supervisors
Butte Creek Watershed Conservancy
PWard, CDF&G
CALFED Ecosystem Roundtable members