Pacific Gas and Electric Co. Comments
Institute for Fisheries Resources Proposal 98-A1004
Opening up Butte Creek Canyon to Salmon and Steelhead Fish Passage

II. Executive Summary

Sections b and c - The statement, "The goal of the project is to prepare a fish passage plan for reaches of Butte Creek now blocked by both natural barriers and hydroelectric dams..." suggests that there has already been a decision to provide passage into the upper canyon and that the purpose of the study is to formalize unwritten policy and develop an approach and schedule for various action items (barrier removal, fish passage facilities at dams, and environmental document preparation and review).

Section d - IFR justifies the proposal by citing the CALFED ERPP (Ecosystem Restoration Plan), CDFG 1995 (should be 1993) Restoration Plan, and the AFRP (CVPIA) as support for conducting carrying out this action. However, it should be pointed out that neither the CAFED ERPP nor the CDFG plan actually call for studies to extend passage beyond Centerville Diversion. Although the AFRP does include an action item to potentially look at the feasibility for providing passage above Centerville Diversion, this action in our view should be considered a low priority for the upper water shed because the limited potential benefit and vs. other environmental impacts to the public, landowners, and ecology of the area.

Section e - This section does not fully identify the third party impacts to the opening of fish passage and fails to list potential biological impacts associated with the action. In addition to lost renewable energy generation from resulting from increased flows and other hydropower impacts, the project could impact recreational use (i.e., fishing and gold dredging), logging and land use practices, and have an unknown biological impact on other species in the upstream area. Available information suggests that anadromous fish had extremely limited access to Butte Creek above Centerville Diversion and this information is purely anecdotal. Introducing salmon and steelhead to this reach could adversely affect other aquatic sensitive species such as yellow-legged frogs and possibly red-legged frogs if they occur. Currently the stream section above Centerville Diversion contains only rainbow and brown trout. Introducing salmon and steelhead to this section via barrier modifications will also allow other non-game fish including suckers, hardhead, and squawfish to occupy this area. The introduction could adversely impact the ecology of the area. To PG&E's knowledge, we have not heard from the resource agencies regarding their position on the potential biological impacts of introducing anadromous and non-game fish to this upper canyon reach.

Section h - PG&E is not a willing supporter of this project for various reasons. PG&E has only participated by providing watershed stream access to interested resource agencies and NGO's through its own land.

III. Title Page

Section e - PG&E should not be named as a participant, but rather as a stakeholder.

IV. Project Description

Section a, first paragraph - This paragraph indicates that the 1997 studies established cooperation with PG&E (presumably for providing passage) and provided an initial determination of habitat quality, warranting further studies and the development of a fish passage and restoration plan.

However, in actuality it established that gravel of good spawning quality would only support about 200 spawning redds. Additionally, the report identified 77 apparent natural barriers, of which only 35 could potential by made passable by moderate increases in flow. Given the potential cost to remove and maintain these natural barriers, install fish passage facilities at diversions, and loss of renewable energy, it does not appear cost effective relative to the potential production associated with 200 redds.

Section a, second paragraph - It is stated that salmon have been observed in Butte Creek above Centerville Diversion in 1998. As we have already discussed, salmon have never been observed above Centerville Diversion. In fact, salmon have been only observed once (1995) above a natural barrier that exists approximately 1 mile below Centerville Diversion during the last 18 years of surveys conducted by PG&E and CDFG. It is also particularly noteworthy to mention that the last water year (WY98) was extremely wet and the return of spring-run to Butte Creek was estimated between 18,000-20,000, yet no salmon were observed above this lower barrier. Thus, the proposal statement that it appears appropriate to more closely evaluate fish habitat and barrier removal is really without merit. However, it might be useful to develop information on habitat quality for spawning and holding in the stream reaches below Centerville Diversion and Centerville Powerhouse as proposed.

If the proposal is accepted, the focus of the project should be to merely develop information related to the feasibility of providing passage and not to have as one of its products a completed plan establishing access to stream reaches above Centerville.

Section b, Task 1 - There needs to be a policy established regarding introduction of salmon and non-game species above Centerville diversion dam or other areas where the species were not historically present.

Section b, Task 2 - The paragraph should also state the obvious that upon further investigation of policy and potential environmental impacts, a work plan for further action may not be warranted.

Section b, Task 3 - In additional to obtaining information on holding pool habitat, other major focuses of the for the reaches below Centerville diversion should be gravel abundance and quality, and natural fish barriers. An estimate of holding and spawning potential should be developed.

IFIM data will likely be necessary to develop appropriate minimum flow recommendation for reaches above Centerville Diversion. It is unlikely that PG&E and the resource agencies would accept the limited information available to establish future flow needs. The proposal suggests that 40 cfs is an appropriate instream flow for salmon

and steelhead in the diverted reach below Butte Head Dam. We believe this to be an unprofessional conclusion on the part of IFR and should not have been included in the proposal. The proposal also states that with the 40 cfs recommendation below Butte Head Dam, the only reach that needs further evaluation concerning flow and habitat lies between Centerville diversion dam and Centerville powerhouse. This statement is rather ironic since this reach has been studied rather extensively, including IFIM and temperature modeling studies.

Section b, Tasks 4 and 5 - PG&E should be involved in any future evaluations of natural barriers and fish passage facilities within the project area.

Section b, Tasks 6-10 - These tasks should emphasize the "feasibility" aspect of this study and not IFR's goal of specifically providing passage for anadromous fish in these upper reaches as stated on page 8, paragraph 4.

Section d - The proposal states that spring-run salmon populations could be significantly increased by extending passage above Centerville Diversion. Salmon returns this year ranged between 18,000-20,000 without the passage above Centerville Diversion. Studies to date suggest that the diverted reach below Butte Head Dam would only support between 200-500 redds or 500-1000 salmon spawners. This does not suggest a significant benefit, particularly when adverse impacts to the stream and its current uses are considered.

Section e, first paragraph - Again, the proposal incorrectly states that the CALFED ERPP and CDFG Restoration Plan call for this study.

Section e, second paragraph - Although the AFRP stresses the need to increase the natural production of salmon and steelhead, this project needs to be fully evaluated relative to the biological and non-biological impacts of introducing anadromous and nongame fish into reaches were they may be considered non-native species.

Section e, fifth paragraph - The proposal continues to provide erroneous statements by claiming that this project will provide habitat for as many as 15,000 spring-run spawners. As previously determined by IFR's own study in 1996, opening up the reach above Centerville Diversion will only provide spawning habitat for approximately 200-500 salmon. This wording appears to be purposely aimed at misleading the public and is unacceptable to PG&E, as it should be to the CALFED organization and the public.