December 4, 2014

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426
West Branch
Division of Hydropower Licensing
ATTN: Kenneth Hogan

RE: LASSEN LODGE HYDROELECTRIC PROJECT NO. 12496-000

Dear Mr. Hogan:

Tehama County has reviewed the 1,800 plus page FERC application, Environmental Report and the attached appendices for a license to establish and operate a 5 megawatt (MW) hydropower facility sited on the upper South Fork Battle Creek, approximately 1.5 miles west of the town of Mineral, an unincorporated community in Tehama County, California.

The Project is located primarily on the south bank of South Fork Battle Creek between elevations of 3,417 feet and 4,310 feet above mean sea level. Power generated from the Project will be transmitted by a new, approximately 12-mile-long, 60 kV transmission line ranging in elevation from 3,470 feet at the generation substation climbing up to a maximum elevation of 4,422 feet then down to the low point of the transmission line at an elevation of approximately 2,105 feet, where it interconnects with the Pacific Gas and Electric (PG&E) Volta – South Transmission line in the town of Manton, California.

The Environmental Report has identified significant impacts associated with both the construction and operational aspects of the Project. Section 102 of the National Environmental Policy Act requires federal agencies to incorporate environmental considerations in their planning and decision-making and to prepare a detailed statement assessing the environmental impact of and alternatives to major federal actions significantly affecting the environment.
Other Significant Impacts

- Project may significantly impact the County's existing recreational opportunities contrary to the Tehama County General Plan Economic Development Element.
- The Project may significantly impact the social economics related to the tourism industry in Tehama County.
- Project may significantly impact areas identified as critical riparian zones contrary to the Tehama County General Plan Open Space and Conservation Element.
- Project may significantly impact the ability to protect fish populations and ensure adequate flow levels for spawning activity contrary to policies and implementation measures of the Tehama County General Plan Open Space and Conservation Element.
- Project may significantly impact fisheries, specifically trout and protected salmon.
- Project may significantly contribute to the aesthetic degradation of the Project site.

The information provided as part of the FERC application provides substantial evidence that the Project will necessitate the preparation of an Environment Impact Statement (EIS). Therefore, the County of Tehama is requesting that the Federal Energy Regulatory Commission prepare an EIS.

Respectfully,

Sean M. Moore, AICP
Director of Planning
Tehama County, CA