

Forsgren Letter

With respect to the applicability of the EPA temperature guidance mentioned above, the EPA considers there to be an open and legitimate scientific question about the adaptability of salmonid populations to warmer conditions in California. The EPA is aware of research with salmonid species from California rivers that suggests populations at the southern limit of their distribution may be locally adjusted to warmer temperatures relative to more northern populations, and that these findings challenge the use of a single thermal criterion along the entirety of its distribution range. We would encourage FERC to use the most up to date research on the impact on fish populations in its review of these projects.

FERC Summary of Forsgren Letter

2018), EPA states that it is aware of research with salmonid species from California rivers that suggests populations at the southern limit of their distribution may be locally adjusted to warmer temperatures relative to more northern populations, and that these findings challenge the use of a single thermal criterion for their entire range. EPA concludes the issue of whether salmonid populations are adaptable to warmer conditions in California is an open and legitimate scientific question and encourages use of the most up-to-date research to evaluate the impact on fish populations.