



August 11, 2016

Submitted via e-filing

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426-0001

Re: Potter Valley Project, FERC No. 77-282: COMMENTS AND RECOMENDATIONS regarding an Application by Pacific Gas and Electric Company for Temporary Variance of Minimum Flow Requirements.

Dear Secretary Bose,

The Lake Pillsbury Homesite Association supports Pacific Gas and Electric Company's (PG&E) Potter Valley Project (FERC No. 77-282) 2016 Flow Variance Request but with serious reservations.

There was more than adequate rainfall to fill the reservoir to capacity many times over in the month of March alone. If PG&E had monitored the snowpack in this watershed they'd have known that a very large portion of March flow was the watershed's snowpack going over the spillway and out to the ocean due to warm storms, not just flow from the storms themselves. This was the time to request early gate closure and capture the outflow, not assume it meant more was on the way.

Due to the relatively small size of this reservoir, the unpredictable and unreliable nature of this watershed, and the many beneficial uses dependent upon full storage volume at Lake Pillsbury it is critical that PG&E better monitor the snowpack within the watershed and act quickly to capture its full storage volume when needed. One week earlier closure this year would have filled the reservoir and avoided the need for this variance. We can always let water out if we have large late spring storms but we can never bring the water back upstream. We've shared these concerns with PG&E and believe they are taking steps to ensure we will not have the same outcome given the same circumstances in the future.

A second major concern regarding the request for variance has to do with the grossly failed nature of the Reasonable and Prudent Alternative (RPA) itself which allocates water based solely on past flows and not on reservoir levels and availability of the water.

The RPA has had a devastating effect on REC (1) and REC (2). We look forward to the upcoming project relicensing where these beneficial uses can be given equal consideration with input from actual lake users.

The RPA was approved on assumptions that in any 7 of 10 consecutive years the boat ramps at Fuller Grove and Sunset Point which serve 90% of the lake users would be in service through Memorial Day

weekend. In the 14 summers since the RPA's adoption, this goal has been met twice. The current action to address this, a deep water boat ramp on the opposite end of the lake from the vast majority of users displays either a gross misunderstanding of recreation on the lake or worse, an insincere effort to address recreation. People will not bring a boat one hour down a poorly maintained dirt road to camp next to a what has become a mudflat and then drive their boat another half hour in the morning to launch.

The only solution that will result in measureable recreational use through the summer is filling the reservoir and maintaining storage levels above 45,000 acre feet over this period of time. PG&E records of campsite attendance at Sunset and Pogie Point campgrounds before and after ramp closure since 2004 will attest to this in dramatic fashion and will continue to do so even with the new ramp in place although we understand "that ship has sailed".

We appreciate the opportunity to address the Commission with our concerns and have an active role in future licensing and discussions as longtime stakeholders. Please accept this submittal as formal COMMENTS AND RECOMENDATIONS in the matter of FERC 77-282.

Respectfully,

A handwritten signature in blue ink that reads "Brian Clack". The signature is fluid and cursive, with the first name being more prominent than the last.

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