

# BOARD OF SUPERVISORS

# ORIGINAL



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June 17, 2003

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Federal Energy Regulatory Commission  
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Washington, DC 20426

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OFFICE OF THE SECRETARY  
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FEDERAL ENERGY  
REGULATORY COMMISSION

**In response to the FERC scoping document and public meetings held in May, 2003, Plumas County respectfully requests that the following issues be considered in the Environmental Analysis for FERC Project 2105-089.**

The economics of tourism are well documented, as stated in the Licensee's application on page 43 of the Project Resource Summary: "These benefits are realized through great increases in property values, along with increased annual Plumas County tax revenue. In addition, Lake Almanor, Butt Valley Reservoir, and, to a lesser extent, some of the other Project developments are recreation attractions that bring tens of thousands of visits annually leading to significant annual recreation expenditures within Plumas County."

In fact, the Project has become pivotal to the economic health of the County given the declines experienced in other employment sectors within the County.

The *Scoping Document* on page 13 sites that FERC staff have not yet identified any substantive socioeconomic issues associated with the proposed action. This is of particular concern in relation to Executive Order 12898, Environmental Justice, whereby part of the analysis should include the manner in which a rural, distinctly disadvantaged population could be relegated to substandard living conditions. In Plumas County, the Median Household Income (2000 Census Data) is 80% less than the median income in California.

The County firmly believes that the nature of Lake Almanor pre-disposes the surrounding communities to service-based bedroom community development; without adequate infrastructure including sewer, healthcare and transportation systems.

The County is requesting that FERC consider developments outside the Project Boundary (such as Dyer Mountain Resort in neighboring Lassen County) to fully address potential user groups within the Project.

As stated on May 20<sup>th</sup>, the 2105 Committee (formally appointed by the Board of Supervisors), presented their goals and objectives to PG&E for inclusion in the Application. Working through the Collaborative Process, the Committee is seeking alternative proposals to those presented in the License on the following issues:

- **Water Level Operations Condition of Settlement**

To insure the highest and best use of the Waters of the State of California, Plumas County has developed a Lake Level Operations proposal that is currently being modeled by the Licensee. Our observations of historical lake levels insure that these “rule curves” can be met based on thirty years of data.

Proposed changes to Lake Almanor operations (to include, but not limited to: higher flows out of Canyon Dam, gravel cleaning and recruiting flows, whitewater boating flows and cold water mining for Project 1962) could threaten historical recharge capabilities. Current studies suggest that higher the lake levels result in lower the discharge temperatures at Canyon Dam & Prattville, providing the desired downstream improvements.

- **Water Quality Monitoring Program**

Plumas County, the Licensee and others have participated in a comprehensive water quality monitoring program for fifteen years. It is the desire of the County to insure a high level of monitoring, analysis and reporting; and, PG&E has committed \$20,000.00 to that effort. However, as the participation of the State of California and inflation threaten to erode the quality of the program, we insist that a valuation clause be included in the license.

- **Comprehensive Recreation Plan**

FERC requested a comprehensive recreation plan in 1992, and although EDAW Consultants have accommodated the County in many regards, the presentation of alternative sites and the development of trail systems need further exploration. In an effort minimize erosion, cultural site exploitation and private property trespass, including that of the Licensee, Plumas County seeks construction funds for the proposed trail extension along the East Shore and a plan for alternative recreation sites.

- **Erosion**

Plumas County disputes the assertion that the Clifford Deed and a Dept. of Transportation Agreement, signed in 1947, are relative to current environmental standards. Increases in Lake Levels in 1972 affected setbacks for homeowners on the shoreline. Higher wave action and impacts on infrastructure were not fully analyzed in the Dept. of Water Resources Environmental Impact report. Further unchecked erosion will threaten water quality and infrastructure.

- **Public Access**

Plumas County has provided extensive input the Shoreline Management Plan, and has submitted changes to the Licensee to be more consistent with zoning developed by the County Planning Dept. Access to project lands is of high concern because of the level of development around the shoreline and proposed restrictions on traditional vehicle access points.

- **Public Safety**

The interest of the County is that all visitors and residents have a safe experience, and we accept the offer of financial support for enforcement through the Sheriffs' Office. Currently, the Licensee is reviewing a Memorandum of Understanding for inclusion in the License. This document is based on the past record of settlements with Plaintiffs and the recognition that water elevation changes pose safety threats.

Please consider these important issues to the Plumas County Board of Supervisors.

Sincerely,



B.J. Pearson, Chairman  
Plumas County Board of Supervisors

cc: Attached Service List

Service List for P-2105

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