



Mendocino County Farm Bureau

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Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

June 4, 2021

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

Reference: Potter Valley Hydroelectric Project No. 77-306

Electronically Submitted

Applicant: Pacific Gas and Electric (PG&E)

RE: COMMENTS for April 23, 2021 Notice of Application for Temporary Variance of Flow Requirements

The Mendocino County Farm Bureau (MCFB) is a non-governmental, non-profit, voluntary membership, advocacy group whose purpose is to protect and promote agricultural interests throughout the county and to find solutions to the problems facing agricultural businesses and the rural community. This letter is being submitted by MCFB and the attached signatories of concerned members and citizens for the April 23, 2021 notice of application for temporary variance of flow requirements connected to the Potter Valley Hydroelectric Project No. 77-306 submitted by the applicant, Pacific Gas and Electric (PG&E).

The 2021 low water year is proving to be problematic for numerous watersheds in Mendocino County and throughout California. Stored water is once again a key component in managing water supply for multiple beneficial uses under drought conditions. The water supply in Lake Pillsbury diverted through the Potter Valley Project has been, and will continue to be, essential to the water supply for numerous communities along the Russian River as well as for in-stream needs for the Upper Main Eel River.

MCFB and the attached signatories would like to remind FERC that the temporary variance proposal submitted from the applicant on April 23, 2021 is not an equitable reduction of the allocation for the stored water supply in Lake Pillsbury amongst all beneficial water users. The reduction of the flow into the East Branch Russian River is significant, while the flows for the Upper Main Eel River will not see any variance.

By reducing the flows in the East Branch Russian River to as low as 5 CFS, the water supply for all beneficial users downstream will be impacted. Potter Valley Irrigation District will receive reduced allocations, appropriative water rights holders from the East Branch Russian River to the confluence with Dry Creek in Sonoma County will be subject to curtailments in part due to lack of inflow into Lake Mendocino, fire suppression water supply will be minimal and overall water quality will be further degraded for Russian River instream flow uses.

It is understood that the applicant needs to take action to protect the infrastructure at Lake Pillsbury by maintaining a minimal water supply pool of 12,000 AF. However, the applicant should have been more proactive earlier in the year to activate drought protocols knowing the water year conditions the system was facing. Stored water resources were reduced from lack of early action which has resulted in more severe flow restrictions being placed on the East Branch Russian River in the variance proposal submitted at the end of April.

MCFB and the additional signatories to this letter encourage FERC to consider the points above in the review of the application for the temporary variance of the flow requirements from the Potter Valley Project. Low water years will occur again. It is in the best interest of all the beneficiaries of the water supply from Lake Pillsbury and the Potter Valley Project to see a more proactive and equitable planning process put in place when water supplies are limited.

Sincerely,

George Hollister
President