



COUNTY OF MENDOCINO

Glenn McGourty, 1st District Supervisor

501 Low Gap Road
Ukiah, CA 95482-3734

Website: www.mendocinocounty.org

Office: (707)463-4441
Fax: (707)463-4673

August 7, 2024

Re: *Letter of Support for Ukiah's Request for Rehearing of the Commission's Order Approving Temporary Variance of Flow Requirements (Potter Valley Project No. 77-320)*

Dear Commissioners,

On June 27th, 2024, the Federal Energy Regulatory Commission (the "Commission") issued an order approving Pacific Gas & Electric Company's ("PG&E") request that the Commission approve a temporary variance of flow releases into the East Branch of the Russian River to match dry and critical water year requirements of between 25 cfs and 5 cfs. On July 29th, 2024, the City of Ukiah filed a request that the Commission rehear the Order.

I represent the 1st Supervisorial District of Mendocino County where the Potter Valley Project is located. In my district, there are over 15,000 acres of irrigated farmland and 5 unincorporated towns that have a direct dependency on water that is imported from the Eel River, stored in Lake Mendocino and then distributed for use. Additionally, there are fisheries, wildlife and the riparian ecosystem of the Russian River that are dependent on summer flows from the Eel River for sustained health.

To my knowledge, there has not been any environmental or financial evaluation of the Order's impact of these reduced flows on our region. I strongly agree with the City of Ukiah's observation that this Order risks putting the Upper Russian River into an administratively-manufactured drought by restricting flows down to 5 cfs in what is otherwise a normal water year for the Upper Russian River. That this administratively-manufactured drought is imposed upon us and our neighbors without complying with the requirements of the National Environmental Policy Act is a grave concern of fairness and due process. The record before the Commission on the impacts the Order will have on the Upper Russian River is severely lacking, if there is any at all. On behalf of my constituency in the First District, we insist on nothing more than to be afforded equal dignity and treatment with the other interests affected by the Order.

This is an issue of paramount importance for our region. Please honor Ukiah's request for further review of this decision, recognizing the potential unintended consequences and potential damage to our community, economy and ecosystems. I urge the Commission in the strongest possible terms to grant the rehearing and stay implementation of that part of the Order approving reductions to the East Branch Russian River below 25 cfs while FERC complies with NEPA.

Sincerely:

A handwritten signature in blue ink, appearing to read "Glenn McGourty".

Glenn McGourty, 1st District Supervisor

MAUREEN MULHEREN
Supervisor
Second District



OFFICE PHONE: (707) 463-4221
DIRECT LINE: (707) 391-3664
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MAILING ADDRESS:
501 Low Gap Road, Room 1010
Ukiah, CA 95482

COUNTY OF MENDOCINO
BOARD OF SUPERVISORS
501 Low Gap Road • Room 1010
Ukiah, California 95482

August 8, 2024

Re: Letter of Support for Ukiah's Request for Rehearing of the Commission's Order Approving Temporary Variance of Flow Requirements (Potter Valley Project No. 77-320)

Dear Commissioners,

On June 27th, 2024, the Federal Energy Regulatory Commission (the "Commission") issued an order approving Pacific Gas & Electric Company's ("PG&E") request that the Commission approve a temporary variance of flow releases into the East Branch of the Russian River to match dry and critical water year requirements of between 25 cfs and 5 cfs. On July 29th, 2024, the City of Ukiah filed a request that the Commission rehear the Order.

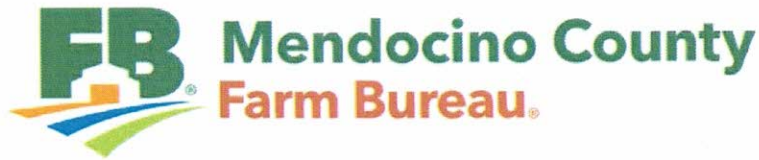
I represent the 2nd Supervisorial District of Mendocino County where the City of Ukiah, the County seat, is located. I have over 18,000 constituents in my District, and that does not include the innumerable neighbors, visitors, and shoppers who come into the City to work, learn, relax, shop, and enjoy our bucolic town nestled in the Ukiah Valley. These, too, are in some respect my constituents, and they all, without realizing, benefit from water imported from the Eel into the Russian. Whether they are families with gardens, children playing softball, families picnicking at a park, shoppers on School Street, business owners providing services or selling their wares, or fishermen, hikers, and bikers enjoying the fact that the Russian slides right by us, each of us are intimately tied to the waters of the Russian and augmented by those of the Eel – our community, like the entire Upper Russian River, developed and grew because of those waters.

I am surprised and disappointed in the lack of economic, communal, and environmental evaluation of the Order's impact of the reduced flows to our region. I strongly agree with the City of Ukiah's observation that this Order risks putting the Upper Russian River into an administratively-manufactured drought by restricting flows down to 5 cfs in what is otherwise a normal water year for the Upper Russian River. The record before the Commission on the impacts the Order will have on the Upper Russian River is severely lacking, where there is any at all. That this administratively-manufactured drought is imposed upon us and our neighbors without complying with the requirements of the National Environmental Policy Act is a grave concern to me and my constituents. On behalf of my constituency in the First District, we insist on nothing more than to be afforded equal dignity and treatment with the other interests affected by the Order.

This is an issue of paramount importance for our region. Please honor Ukiah's request for further review of this decision, recognizing the potential unintended consequences and potential damage to our community, economy and ecosystems the Order will cause. I urge the Commission in the strongest possible terms to grant the rehearing and stay implementation of that part of the Order approving reductions to the East Branch Russian River below 25 cfs while FERC complies with NEPA.

Maureen Mulheren

Maureen Mulheren,
Second District
Board of Supervisors Mendocino
County



303-C Talmage Rd. Ukiah, CA 95482

admin@mendofb.org

(707) 462-6664

Affiliated with California Farm Bureau and American Farm Bureau Federation

August 13, 2024

Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street, N.E., Room 1A
Washington, DC 20426

Re: Letter of Support for the City of Ukiah's Request for Rehearing of the Commission's Order Approving Temporary Variance of Flow Requirements (Potter Valley Project No. 77-320)

Dear Commissioners,

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. MCFB would like to submit the following letter of support for the July 29th, 2024, filing from the City of Ukiah requesting that the Federal Energy Regulatory Commission (Commission) rehear the June 27, 2024, order approving Pacific Gas & Electric Company's (PG&E) temporary variance of flow releases into the East Branch of the Russian River to match dry and critical water year requirements of between 25 CFS and 5 CFS.

The decisions by PG&E in this current variance request directly impacts the water supply reliability within the Russian River Watershed. The impacts of decreased water diversions from the Potter Valley Project (Project) are vast as agricultural, municipal and environmental beneficial uses in the Upper Russian River rely on this water. Hundreds of water right holders have been granted the ability to use water from the Project by the California State Water Resources Control Board. Many of these are MCFB members.

In the MCFB comments submitted to the Commission in April 2024, our opposition to the PG&E variance was stated as was the request that the Commission require PG&E to complete a NEPA level review to analyze the ecological and economic impacts connected to the reduced flows from

the Project into the Upper Russian River prior to approving the variance. However, the variance was granted without consideration of this request.

MCFB agrees with the City of Ukiah's statements that the flow regime approved by this variance risks putting the Upper Russian River into an administratively manufactured drought by restricting flows down to 5 CFS even though it is a normal water year for the Upper Russian River. We also concur that the approval of this variance establishes a concerning standard for reducing flows from the Project into the Upper Russian River in 2024 and future years without regard for the requirements of NEPA.

MCFB and our members are invested in the current and future operations of the Project. If PG&E is going to be requesting an annual variance, or a permanent variance in flows, for operating the Project, then there truly needs to be more consideration provided to the impacts from these decisions on the Upper Russian River. For this reason, MCFB supports the City of Ukiah's request for a rehearing of the Commission's order to approve the 2024 temporary variance of flow requirements for the Potter Valley Project and we hope that the Commission seriously considers the arguments for supporting this request.

Sincerely,

A handwritten signature in cursive script that reads "Jazzmynn Randall". The signature is written in black ink and is positioned above the typed name.

Jazzmynn Randall

Executive Director

BEFORE THE UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company

FERC Project No. 77-320

Application for Temporary
Variance of Flow Requirements
FERC Project No. 77-320

Re: ***Millview County Water District Letter of Support for Ukiah's Request for Rehearing of the Commission's Order Approving Temporary Variance of Flow Requirements (Potter Valley Project No. 77-320)***

Dear Commissioners,

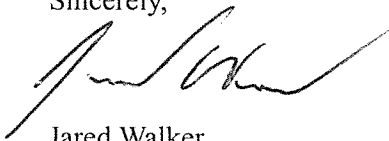
On June 27th, 2024, the Federal Energy Regulatory Commission (the "Commission") issued an order approving Pacific Gas & Electric Company's ("PG&E") request that the Commission approve a temporary variance of flow releases into the East Branch of the Russian River to match dry and critical water year requirements of between 25 cfs and 5 cfs. On July 29th, 2024, the City of Ukiah filed a request that the Commission rehear the Order.

Millview County Water District (Millview) is a public entity that provides water to approximately 5,500 people in the Ukiah Valley in California. Millview diverts water from the Russian River for its customer, and therefore Millview and its constituents have a direct interest in water that is imported through the Potter Valley Project.

Millview echoes Ukiah's observation that the Order puts the Upper Russian River into an administratively-manufactured drought by restricting flows down to 5 cfs in what is otherwise a normal water year for the Upper Russian River. That this administratively-manufactured drought is imposed upon us and our neighbors without complying with the requirements of the National Environmental Policy Act adds insult to injury. The record before the Commission on the impacts the Order will have on the Upper Russian River is severely lacking, when it is there at all. We, along with our neighbors, insist upon nothing more than to be afforded equal dignity and treatment with the other interests affected by the Order.

This is an issue of paramount importance for our region. We urge the Commission in the strongest possible terms to grant the rehearing and stay implementation of that part of the Order approving reductions to the East Branch Russian River below 25 cfs while FERC complies with NEPA.

Sincerely,



Jared Walker
General Manager
Millview County Water District

BEFORE THE UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company

FERC Project No. 77-320

Application for Temporary
Variance of Flow Requirements
FERC Project No. 77-320

Re: ***Redwood Valley County Water District Letter of Support for Ukiah's Request for Rehearing of the Commission's Order Approving Temporary Variance of Flow Requirements (Potter Valley Project No. 77-320)***

Dear Commissioners,

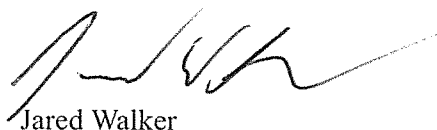
On June 27th, 2024, the Federal Energy Regulatory Commission (the "Commission") issued an order approving Pacific Gas & Electric Company's ("PG&E") request that the Commission approve a temporary variance of flow releases into the East Branch of the Russian River to match dry and critical water year requirements of between 25 cfs and 5 cfs. On July 29th, 2024, the City of Ukiah filed a request that the Commission rehear the Order.

Redwood Valley County Water District (Redwood Valley) a public entity that provides water to approximately 5,000 people in the Ukiah Valley in California. Redwood Valley diverts water from Lake Mendocino for its customer, and therefore Redwood Valley and its constituents have a direct interest in water that is imported through the Potter Valley Project.

Redwood Valley echoes Ukiah's observation that the Order puts the Upper Russian River into an administratively-manufactured drought by restricting flows down to 5 cfs in what is otherwise a normal water year for the Upper Russian River. That this administratively-manufactured drought is imposed upon us and our neighbors without complying with the requirements of the National Environmental Policy Act adds insult to injury. The record before the Commission on the impacts the Order will have on the Upper Russian River is severely lacking, when it is there at all. We, along with our neighbors, insist upon nothing more than to be afforded equal dignity and treatment with the other interests affected by the Order.

This is an issue of paramount importance for our region. We urge the Commission in the strongest possible terms to grant the rehearing and stay implementation of that part of the Order approving reductions to the East Branch Russian River below 25 cfs while FERC complies with NEPA.

Sincerely,



Jared Walker
General Manager
Redwood Valley County Water District

BEFORE THE UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company

FERC Project No. 77-320

Application for Temporary
Variance of Flow Requirements
FERC Project No. 77-320

Re: *Willow County Water District Letter of Support for Ukiah's Request for Rehearing of the Commission's Order Approving Temporary Variance of Flow Requirements (Potter Valley Project No. 77-320)*

Dear Commissioners,

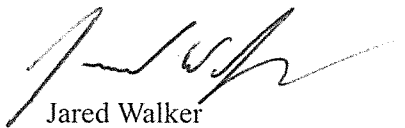
On June 27th, 2024, the Federal Energy Regulatory Commission (the "Commission") issued an order approving Pacific Gas & Electric Company's ("PG&E") request that the Commission approve a temporary variance of flow releases into the East Branch of the Russian River to match dry and critical water year requirements of between 25 cfs and 5 cfs. On July 29th, 2024, the City of Ukiah filed a request that the Commission rehear the Order.

Willow County Water District (Willow) a public entity that provides water to approximately 3,500 people in the Ukiah Valley in California. Willow diverts water from the Russian River for its customer, and therefore Willow and its constituents have a direct interest in water that is imported through the Potter Valley Project.

Willow echoes Ukiah's observation that the Order puts the Upper Russian River into an administratively-manufactured drought by restricting flows down to 5 cfs in what is otherwise a normal water year for the Upper Russian River. That this administratively-manufactured drought is imposed upon us and our neighbors without complying with the requirements of the National Environmental Policy Act adds insult to injury. The record before the Commission on the impacts the Order will have on the Upper Russian River is severely lacking, when it is there at all. We, along with our neighbors, insist upon nothing more than to be afforded equal dignity and treatment with the other interests affected by the Order.

This is an issue of paramount importance for our region. We urge the Commission in the strongest possible terms to grant the rehearing and stay implementation of that part of the Order approving reductions to the East Branch Russian River below 25 cfs while FERC complies with NEPA.

Sincerely,



Jared Walker
General Manager
Willow County Water District