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Via Electronic Submittal (E-Filing)

Secretary Debbie-Ann A. Reese
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington DC 20426

RE: COMMENTS for Potter Valley Project No. 77-332 by the Potter Valley Irrigation District on Scoping Document 1 for the proposed Potter Valley Hydroelectric Project surrender and decommissioning, and related proposed non-project use of project lands for the New Eel-Russian Facility.

Dear Secretary Reese,

Potter Valley Irrigation District ("PVID" or the "District") submits these scoping comments in response to the Federal Energy Regulatory Commission's May 22, 2026 Scoping Document for an environmental assessment or environmental impact Statement (collectively referred to as the "NEPA Document") concerning Pacific Gas and Electric Company's ("PG&E") application for surrender and decommissioning of the Potter Valley Hydroelectric Project No. 77 (the "Project"), together with the related proposed non-project use of project lands for construction of the New Eel-Russian Facility ("NERF") to divert water through portions of the Project's existing infrastructure for non-project purposes. PVID is a member agency of the Mendocino County Inland Water and Power Commission ("IWPC"), a Joint Powers Authority ("JPA") and by extension a member of the Eel-Russian Project Authority ("ERPA").

At the outset, PVID appreciates the Commission's recognition in section 3.4.3 of the Scoping Document of the District's contractual entitlement to 19,000 acre-feet of water under its contract with PG&E. That recognition is important and should remain a foundational premise of the Commission's environmental review and any ultimate surrender order. The NEPA Document should expressly analyze how that 19,000 acre-foot contractual supply, and the water needs of other downstream users dependent on Potter Valley Project diversions and related facilities, will be protected in practical, operational, and legally enforceable terms.

PVID further submits that the proposed surrender, decommissioning, and related NERF proposal may materially affect water diversion, conveyance, timing of flows, infrastructure functionality, fisheries management, agricultural water supplies, local communities, and long-

term watershed conditions in Lake and Mendocino Counties. For that reason, the NEPA Document must rigorously evaluate direct, indirect, and cumulative effects and must not treat continued water diversion, reduced diversion, altered diversion, decommissioning sequencing, or non-project infrastructure reuse as foregone conclusions.

The NEPA Document must also squarely address the environmental consequences within the Russian River system if diversion is reduced or interrupted. The Potter Valley Project's diverted flows do not serve only consumptive uses. They also support aquatic habitat conditions, base flows, water temperature moderation, and overall ecological function in portions of the Russian River watershed. Accordingly, the NEPA Document should evaluate not only the environmental benefits and burdens in the Eel River system, but also the environmental effects in the Russian River system that may result from reduced imported water, reduced operational flexibility, or inadequate replacement storage. Continued diversion through a mandated NERF, together with increased storage in the Potter Valley area, should be analyzed as necessary components of a long-term strategy to sustain both human and ecological needs in the Russian River basin.

Most importantly, the NEPA Document should evaluate and carry forward an analysis under which: (1) the NERF is mandated as a required component of any surrender and decommissioning approval; and (2) the massive negative environmental, economic, and social impact that will occur if decommissioning and removal of the two dams on the Eel River proceeds before water storage in the Russian River basin, specifically in the Potter Valley area, has been fully funded, permitted, constructed, and made operational for the benefit of PVID and other downstream users. In PVID's view, this is not simply a preferable mitigation approach. Unless and until new storage is operational decommissioning is not a true two basin solution and will have unacceptable impacts on water supply reliability, agriculture, local communities, and the long-term health of aquatic and terrestrial ecosystems in the Russian River system. Potter Valley in particular is at greatest risk of these impacts because it does not have any access to water stored in Lake Mendocino or elsewhere to offset any of the loss of stored summer water.

The District requests that these comments be included in the administrative record for Project No. 77-332 and that PVID receive notice of all future filings, technical meetings, site visits, environmental review milestones, and opportunities to comment.

I. PVID's Interest in the Proceeding

PVID is a public irrigation district serving agricultural and related beneficial uses in the Potter Valley region. The District and the landowners, producers, and communities it serves have a direct interest in any federal action affecting the Potter Valley Project facilities, diversion regime, project lands, and the proposed transition from licensed hydroelectric operations to surrender, decommissioning, and potential non-project conveyance use.

As described in the Scoping Document, the Project is located on the Eel River and East Fork Russian River in Lake and Mendocino Counties, California, and occupies federal lands managed

by the U.S. Forest Service in the Mendocino National Forest. The Project and associated facilities have long played a central role in regional water management conditions, and have been fundamental to the ongoing existence of PVID. Any surrender and decommissioning decision, and any associated approval of non-project use of project lands for the NERF, may alter infrastructure availability, operational flexibility, flow timing, water supply reliability, environmental conditions, and cost allocation in ways that directly affect the District.

Accordingly, the NEPA review should expressly evaluate impacts on public water suppliers, irrigation districts, agricultural users, local communities, and the Russian River aquatic ecosystem, all of which rely on continued lawful and physically feasible diversion, conveyance, storage, and delivery arrangements.

II. Scope of Federal Action Must Be Clearly Defined

The Scoping Document indicates that the Commission is reviewing both: (1) PG&E's application for surrender and decommissioning of the Potter Valley Hydroelectric Project; and (2) the proposed non-project use of project lands to construct the NERF for diversion through some of the Project's existing infrastructure for non-project uses. The NEPA Document should clearly define the full scope of federal action under review and explain the extent to which the surrender, decommissioning activities, removal or modification of project features, continued use of existing infrastructure, construction and operation of the NERF, and the need for replacement storage in the Russian River basin are connected actions, cumulative actions, or otherwise interdependent for NEPA purposes.

In particular, the NEPA Document should not artificially segment the review by analyzing decommissioning separately from the practical consequences for future diversion, conveyance, storage, and watershed operations as those issues are functionally linked. Since the availability, design, timing, and operation of the NERF depends on decommissioning decisions, continued use of tunnels or other infrastructure, land access, rights-of-way, sequencing of facility removal, replacement storage, or related federal approvals, the NEPA Document should analyze those relationships in an integrated and transparent manner.

III. Purpose and Need Must Not Predetermine the Outcome

The NEPA Document should define the purpose and need based on statutory and regulatory responsibilities in reviewing a surrender application and proposed non-project use of project lands, rather than adopting an unduly narrow framing that effectively predetermines full decommissioning outcomes, assumes a single facility configuration, or minimizes consideration of water supply and community dependence interests.

At a minimum, the purpose and need statement should:

- Distinguish between PG&E's objectives and the Commission's decision-making responsibilities;

- Explain the factual and legal basis for any assumed decommissioning endpoints;
- Recognize that the proceeding implicates both environmental restoration interests in the Eel River watershed as well as ongoing regional water supply, storage, infrastructure reliance, and ecosystem health interests in the Russian River watershed;
- Acknowledge that PVID has a 19,000 acre-foot contractual water interest, as referenced in section 3.4.3 of the Scoping Document; and
- Preserve room for meaningful comparison among alternatives with different approaches to facility removal, infrastructure retention, sequencing, non-project water diversion arrangements, and replacement storage construction.

IV. Analysis Must Be Robust and Practical

PVID requests that the NEPA Document evaluate with sufficient detail decommissioning with the full inclusion of the NERF, including facilities, operations, sequencing, timelines, access, maintenance, storage components, and expected hydrologic, ecological, and community effects.

At a minimum, the NEPA Document should analyze the following, to the extent within the Commission's jurisdiction or necessary to inform its decision:

1. **Proposed Surrender and Decommissioning.** The full PG&E proposal, including necessary facility removals, modifications, site restoration, deconstruction methods, access needs, disposal activities, timing, and post-surrender land and infrastructure conditions.
2. **Retention of Specified Infrastructure.** An evaluation of the infrastructure that will need to be retained, stabilized, repurposed, or transferred to ERPA in a manner that reduces environmental disturbance and preserves water management ability.
3. **Phased Decommissioning.** An analysis that sequences decommissioning activities to allow engineering review, environmental monitoring, adaptive management, construction of new diversion infrastructure, construction of new water storage facilities, and transition planning before irreversible removal decisions are implemented.
4. **Water Supply Reliability and Russian River Ecosystem Protection.** An analysis designed specifically to minimize interruption to existing diversion-dependent uses while also maintaining or improving aquatic habitat conditions, seasonal base flows, and ecological resilience in the Russian River watershed.
5. **NERF Integrated.** An analysis that evaluates surrender and decommissioning together with the construction and operation of the NERF and associated new storage as a coordinated action, including construction overlap, infrastructure interfaces, shared

access, operational assumptions, and cumulative impacts.

6. **Analysis with NERF and Replacement Storage.** An analysis under which approval of surrender and decommissioning is determined with NERF and replacement water storage in the Russian River basin being in place, specifically in the Potter Valley area. Any decommissioning occurring without these projects being fully funded, permitted, constructed, and operational before decommissioning or removal of the two dams on the Eel River must be analyzed as comparison.
7. **Reduced Disturbance.** An analysis focused on minimizing in-water work, sediment mobilization, watershed disturbance, and disruption to nearby communities and landowners.

For each alternative, the NEPA Document should disclose what infrastructure would remain, what would be removed, who would own and maintain retained facilities, how diversion and conveyance would function, what storage would be available, what permits or approvals would be required, and what assumptions are made regarding funding, construction sequencing, long-term operation, and ecological performance in the Russian River basin.

V. Issues Requiring Detailed Environmental Analysis

A. Decommissioning Sequencing, Facility Removal, and Infrastructure Condition

The NEPA Document should provide a facility-by-facility description of proposed decommissioning and any related NERF construction, including diversion structures, tunnels, canals, penstocks, roads, spoil areas, staging areas, and associated appurtenances. The analysis should evaluate demolition methods, access routes, temporary disturbance areas, waste handling, hazardous materials management, worker safety interfaces, erosion control, and post-removal stabilization.

Since existing Project infrastructure will be reused and relied upon for non-project purposes, the NEPA Document should assess the condition, capacity, integrity, useful life, maintenance needs, vulnerability, and failure risks of that infrastructure, together with the environmental implications of both continued use and removal.

The NEPA Document should also analyze sequencing alternatives under which the two dams on the Eel River are decommissioned and removed with timing that accounts for need to create replacement storage in the Russian River basin and the NERF is in place and operational. The Commission should address what would occur if decommissioning proceeds without replacement water management infrastructure being in place. Such a sequencing would shift significant risk to PVID, other downstream users, and the Russian River aquatic and terrestrial ecosystem.

B. Water Supply, Hydrology, Flow Regimes, and Storage Reliability

Because the Project created and perpetuated over 100 years of interbasin diversion from the Eel River to the East Fork Russian River system which has resulted in human and ecological reliance on that interbasin diversion, the NEPA Document must carefully analyze how surrender, decommissioning, and the proposed NERF may affect flow timing, diversion quantities, seasonal water availability, drought-year reliability, and operational flexibility. This analysis should not be limited to broad watershed effects; it should specifically evaluate practical consequences for PVID, agricultural users, municipal and domestic users, and other lawful beneficial uses dependent on diverted or conveyed supplies, as well as the ecological consequences in the Russian River system if those flows are reduced.

The hydrology analysis should include:

- Existing and historical diversion and flow conditions;
- The role diverted water currently plays in supporting base flows, seasonal habitat conditions, and aquatic ecosystem function in the Russian River system;
- Expected flows under each alternative in wet, normal, dry, and critically dry years;
- Operational assumptions for bypasses, diversions, outages, and maintenance periods;
- Effects on storage, conveyance, recharge, return flows, and downstream water availability;
- The amount, location, yield, timing, and reliability of any replacement storage in the Russian River basin, especially in the Potter Valley area;
- Potential flood and emergency operations implications on the Eel River System; and
- The interaction between decommissioning sequencing and continued water deliveries.

The NEPA Document should disclose all models, assumptions, and scenario definitions used in the hydrologic analysis and should explain how uncertainty is addressed. The NEPA Document should also evaluate that if the proposed decommissioning lacks funded and completed Potter Valley and other Russian River watershed water storage it would result in significant and unavoidable impacts to PVID, other downstream users, and aquatic resources in the Russian River basin.

C. Sediment Transport, Geomorphology, and Channel Stability

Decommissioning of hydroelectric project features can materially alter sediment movement, channel form, bank stability, and downstream conditions. The NEPA Document should evaluate

short-term and long-term sediment release, transport, deposition, turbidity effects, and geomorphic responses associated with facility removal or modification. The analysis should address whether sediment-related changes could impair diversion works, reduce conveyance efficiency, increase maintenance burdens, affect water quality, or alter flood risk.

Because watershed and channel responses may evolve over time, the NEPA Document should use a time horizon sufficient to capture both immediate construction-related impacts and longer-term post-removal adjustments.

D. Water Quality

The NEPA Document should assess effects on temperature, turbidity, sediment load, dissolved oxygen, nutrient conditions, algae, contaminants, and other relevant water quality indicators in both the Eel River and Russian River systems to the extent affected by the Project and proposed actions. The analysis should address both construction-related and operational effects, as well as implications for compliance with applicable water quality standards and regulatory requirements.

The NEPA Document should also evaluate whether reduced diversion or insufficient replacement storage in the Russian River basin could worsen low-flow conditions, increase water temperatures, reduce habitat suitability, or otherwise impair aquatic ecosystem health in that watershed.

E. Fisheries, Aquatic Resources, and Habitat Conditions

PVID recognizes that fisheries and aquatic habitat issues are central to this proceeding. The NEPA Document should rigorously evaluate expected effects on fish passage, habitat connectivity, spawning and rearing conditions, flow-dependent habitat, entrainment risk, water temperature, sediment-related habitat changes, and ecological function. At the same time, the NEPA Document should transparently evaluate tradeoffs between ecological objectives and impacts on communities and water users, rather than assuming those tradeoffs are negligible.

The NEPA Document should evaluate how the elimination of block water releases from Lake Pillsbury will effect stranding and migration of salmonids and other aquatic species in the Eel River system. The NEPA Document should also endeavor to accurately determine how much additional spawning habitat will be made available above Scott Dam so that agencies and the public at large can have a reasonable expectation as to the potential benefits of this action.

The NEPA Document should not treat the Russian River aquatic environment as environmentally neutral in the face of reduced diversion. The NEPA Document should evaluate how continued diversion, if managed through a mandated NERF and supported by increased Potter Valley-area storage, may be necessary to sustain ecologically important flow conditions, reduce thermal stress, maintain habitat connectivity, and protect the long-term health of aquatic ecosystems in the Russian River system and also identify the impacts to the Russian

River fisheries if such diversions are no longer made and if storage is not available.

If the Commission is considering alternatives intended to improve fisheries conditions through infrastructure removal, modified diversion, or changed flow regimes, the NEPA Document should disclose the degree of scientific uncertainty associated with expected biological outcomes and should evaluate whether those alternatives create secondary impacts on water reliability, cost, infrastructure needs, and aquatic habitat conditions in the Russian River watershed.

F. Agriculture, Land Use, and Local Economy

The NEPA Document should evaluate direct, indirect, and cumulative effects on agricultural production, irrigation timing, crop reliability, local employment, farm operating costs, land values, rural business activity, and county revenues. Because Potter Valley and downstream communities are closely tied to water availability and agricultural productivity, the NEPA Document should not treat local economic effects as speculative or secondary if there are reasonably foreseeable consequences of altered diversion, reduced storage, or delivery conditions.

The analysis should include, to the extent reasonably feasible, quantitative assessment of likely economic consequences associated with reduced reliability, construction disruptions, higher replacement costs, infrastructure transition costs, or changed water management conditions.

G. Recreation, Transportation, Access, and Public Services

The NEPA Document should analyze effects on roads, haul routes, construction traffic, emergency access, recreational access, public safety, and ongoing operation and maintenance access needs. If sediment removal requires vehicular access, then the impact on existing roads and the adjacent lands should be evaluated together.

H. Cultural Resources, Tribal Interests, and Community Character

The NEPA Document should include robust analysis of historic properties, archaeological resources, tribal cultural resources, traditional cultural properties, and community character. PVID supports meaningful tribal consultation and requests that the Commission also evaluate how changes to the Project and related infrastructure may affect the long-standing tribal communities in the Russian River watershed who rely upon the transferred water.

I. Environmental Justice

The NEPA Document should examine how the proposed action will disproportionately burden adjacent rural communities in Lake and Mendocino Counties and agricultural communities, tribal communities, low-income populations, or other populations that will be especially vulnerable to increased water costs, reduced water reliability, project-related disruption, or long-term economic dislocation.

J. Climate Change and Resilience

The NEPA Document should account for climate-driven changes in hydrology, runoff timing, extreme weather, wildfire, sediment pulses, and water temperature, and should assess how those factors may affect both decommissioning impacts and the long-term viability of any retained or replacement diversion and storage infrastructure.

The climate analysis should also address whether continued diversion and increased storage in the Potter Valley area and elsewhere in the Russian River watershed would improve resilience in the Russian River system by buffering drought, maintaining seasonal habitat conditions, and supporting aquatic ecosystems during hotter and drier periods.

VI. NERF Required, Not Merely Considered

PVID appreciates that the Scoping Document identifies the proposed non-project use of project lands to construct the NERF for diversion through some of the Project's existing infrastructure, therefore the NEPA Document must treat the NERF integral to the decommissioning. The NEPA Document should analyze and carry forward assuming that NERF is a mandatory, enforceable component of any surrender approval needed to preserve diversion capability and reduce disruption to existing beneficial uses.

The NEPA Document should disclose, to the extent available:

- The proposed location, footprint, and design of NERF facilities;
- Which existing Project features would be reused, modified, bypassed, or abandoned;
- Construction methods, access needs, staging areas, and timing;
- Expected diversion capacity and operational parameters;
- Ownership, control, operation, and maintenance responsibilities;
- Interfaces between NERF construction and Project decommissioning;
- How NERF implementation will protect PVID's 19,000 acre-foot contractual supply, other downstream users, and aquatic ecosystem conditions in the Russian River system; and
- The permits, approvals, land use authorizations, and environmental compliance obligations required for implementation.

If material aspects of the NERF remain uncertain, the NEPA Document should identify those uncertainties, evaluate a reasonable range of plausible scenarios, and avoid making impact

conclusions that depend on undefined future design choices. But uncertainty is not a basis to omit the NERF from the required action framework if the Commission intends to allow dam decommissioning that would otherwise jeopardize established water supply reliance interests and aquatic ecosystem needs in the Russian River basin.

VII. Replacement Storage in the Russian River Basin Must Be Analyzed in Eel River Dam Decommissioning

The NEPA Document should expressly evaluate and compare alternatives under which decommissioning or removal of the two dams on the Eel River occurs before, simultaneous with, or after replacement storage (either constructed in tranches or all at one) that is fully operational in the Russian River basin, specifically in the Potter Valley area, for the use and benefit of PVID and other downstream users.

That analysis should address:

- The required storage volume and yield needed to maintain reliable deliveries and support ecologically important flow conditions in the Russian River system;
- Proposed storage locations in or near Potter Valley;
- Engineering feasibility and operational integration with diversion and conveyance systems;
- Funding sources, implementation responsibility, and enforceability of funding commitments;
- Construction timeline and sequencing relative to any dam decommissioning activities;
- Interim operations needed to avoid service disruption;
- Long-term ownership, maintenance, and governance of the storage facilities; and
- The consequences to PVID, downstream users, and Russian River aquatic resources if storage is delayed, underbuilt, unfunded, or never completed.

From PVID's perspective, any alternative that allows the two Eel River dams to be decommissioned before replacement storage is in place would externalize project transition risks onto local agricultural users and communities and would fail to account for reasonably foreseeable and significant adverse impacts. The Commission should therefore evaluate likely outcomes if both NERF implementation and operational replacement storage are not in place before dam decommissioning. The benefit of any post decommissioning interbasin water transfers is entirely predicated upon there being storage in place to utilize wet season transfers

during the dry season when that water is needed.

VIII. Baseline Data, Technical Studies, and Modeling Must Be Transparent

PVID requests that the NEPA Document disclose and make available all technical studies, modeling assumptions, engineering reports, sediment analyses, flow scenarios, biological assessments, and infrastructure condition information relied upon in preparing the NEPA Document. The choice of baseline conditions can materially affect the outcome of the analysis, and the NEPA Document should clearly identify the environmental, operational, and temporal baseline used for each topic.

The NEPA Document should not rely on outdated, atypical, or selectively chosen baseline conditions that understate the Project's role in regional water management or overstate confidence in projected post-decommissioning outcomes, including in the Russian River ecosystem.

IX. Cumulative Impacts Analysis Must Address the Full Regional Context

The cumulative impacts analysis should extend beyond site-specific construction effects and evaluate the combined influence of decommissioning, future diversion arrangements, watershed restoration actions, regulatory changes, climate impacts, wildfire, flood events, fisheries measures, storage development, and broader water management developments in the Eel and Russian River basins.

Relevant cumulative factors may include:

- Other agency actions related to the Potter Valley Project or regional diversion operations;
- State and federal fisheries recovery measures;
- Water quality compliance actions;
- Wildfire, flood, drought, and sediment-related watershed disturbances;
- Ongoing or reasonably foreseeable infrastructure transition projects, including NERF and Potter Valley-area storage;
- Regional economic pressures affecting agriculture and rural communities; and
- The combined effect of altered diversion and delayed replacement infrastructure on

existing users and aquatic ecosystems in the Russian River system.

X. Mitigation, Monitoring, and Adaptive Management Must Be Concrete

If the NEPA Document identifies significant or potentially significant impacts, proposed mitigation must be specific, enforceable, funded, and tied to measurable performance standards. The Commission should not defer essential mitigation details to future planning Documents without sufficient standards to permit informed review now.

In particular, the NEPA Document should:

- Identify mitigation measures with enough specificity to assess likely effectiveness;
- Assign implementation and funding responsibility;
- Establish monitoring protocols and reporting obligations;
- Include contingency triggers if hydrologic, water quality, sediment, biological, agricultural, or community impacts exceed expected levels; and
- Explain how adaptive management decisions will be bounded by objective criteria rather than open-ended future discretion.

For avoidance of doubt, PVID's principal position is that mandatory NERF implementation is a condition precedent, not merely mitigation concepts that can be deferred or weakened after surrender approval. Further, completed replacement storage in the Potter Valley area and elsewhere in the Russian River Watershed must be analyzed and upfront mitigation for any issues of timing must be included. Those measures must be evaluated as necessary to protect long-term aquatic ecosystem health in the Russian River basin.

XI. Coordination and Procedural Requests

PVID requests that the Commission:

1. Include these comments in the formal scoping record for Project No. 77-332.
2. Continue to provide notice to PVID of all major filings, scoping meetings, technical workshops, study plans, and environmental review milestones.
3. Ensure meaningful opportunity for review and comment on technical materials supporting the draft NEPA Document.

4. Coordinate with affected federal, state, tribal, and local agencies so that the NEPA Document addresses overlapping issues involving water supply, water quality, fisheries, public lands, cultural resources, storage planning, Russian River ecosystem conditions, and local community impacts.
5. Clearly identify how the Commission's NEPA process will relate to any parallel approvals, consultations, or proceedings required for surrender, decommissioning, NERF implementation, or replacement storage development.

XII. Requested Outcomes

Based on the foregoing, PVID respectfully requests that the Commission:

1. Prepare a comprehensive NEPA Document that evaluates surrender, decommissioning, and the proposed non-project use of project lands for the NERF in an integrated and transparent manner.
2. Carry forward and fully analyze decommissioning under which the NERF is required as a mandatory component of any surrender approval.
3. Carry forward and fully analyze the different likely outcomes that occur with decommissioning before and after replacement water storage in the Russian River basin, specifically in the Potter Valley area, is operational for the benefit of PVID and other downstream users.
4. Recognize and protect in practical operational terms PVID's 19,000 acre-foot contractual water supply identified in section 3.4.3 of the Scoping Document.
5. Evaluate the environmental and economic consequences in the Russian River system if diversion is reduced or interrupted, including impacts on base flows, habitat conditions, water temperature, ecological resilience, long-term aquatic ecosystem health, agricultural production, as well as domestic and commercial water use.
6. Evaluate continued diversion through a NERF, together with new Potter Valley-area water storage and new or increased water storage elsewhere in the Russian River basin as necessary components of a long-term strategy to support both water users and aquatic ecosystems in the Russian River basin.
7. Provide detailed analysis of hydrology, diversion operations, infrastructure condition, sediment, water quality, fisheries, agriculture, environmental justice, cultural resources, climate resilience, and replacement storage feasibility.
8. Disclose all key technical assumptions, engineering constraints, and modeling inputs used in the environmental review.

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9. Develop specific mitigation, monitoring, and adaptive management measures for all significant impacts.

10. Maintain ongoing coordination with PVID and other affected local public agencies throughout the environmental review and decision-making process.

XIII. Reservation of Rights

PVID reserves the right to supplement, refine, or amend these comments as additional information becomes available, including after review of project engineering materials, technical studies, and the draft NEPA Document. Nothing in this letter waives any substantive or procedural rights available to the District under the Federal Power Act, NEPA, or any other applicable law.

Thank you for the opportunity to submit these comments.

Sincerely,



Janet K.F. Pauli

President

Potter Valley Irrigation District