

Mendocino County Inland Water and Power Commission  
P.O. Box 1247, Ukiah, CA 95482  
iwpc@mendoiwpc.com

August 11, 2016

**Via Electronic Submittal (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. P-77-282; COMMENTS AND MOTION TO INTERVENE by the Mendocino County Inland Water and Power Commission regarding an Application by Pacific Gas and Electric Company for a Temporary Variance of Minimum Flow Requirements.**

Dear Secretary Bose,

The Mendocino County Inland Water and Power Commission (MCIWPC), a Joint Powers Authority, representing the County of Mendocino, City of Ukiah, Redwood Valley County Water District, Potter Valley Irrigation District and the Mendocino County Russian River Flood Control and Water Conservation Improvement District, supports Pacific Gas and Electric Company's (PG&E) Potter Valley Project (FERC No. 77-282) 2016 Flow Variance Request due to Limited Water availability with the following comments.

After a normal rainfall season this past Winter and early Spring we assumed that, based on the cumulative inflow, and having exceeded the Dry Spring Exclusion criterion, Lake Pillsbury storage would be classified as normal thus precluding another year where a variance from the National Marine Fisheries Service Reasonable and Prudent Alternative (NMFS RPA) flow schedule would be necessary. However, due to poor snow accumulations and a lack of late spring rains, Lake Pillsbury did not fill to capacity. MCIWPC believes that if a request to close the gates had been made to the California State Division of Safety of Dams earlier PG&E would have been able to store an additional 14,113 acre feet, or approximately 19% of the volume of Lake Pillsbury.

This year the variance request leaves the flows on the Upper Main Eel River as a Wet Year Classification for the duration of the summer and the East Branch of the Russian River (EBRR) will be reduced to a Dry Year Classification to protect storage in Lake Pillsbury. The reduced EBRR flows will impact all beneficial users of the stored water from Lake Pillsbury for the upcoming 2016 Summer and Fall seasons.

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Down river from the Potter Valley Project the diverted water is re-stored in, and then released from, Lake Mendocino supplying municipal and domestic water for the communities of Redwood Valley, Calpella, Ukiah, Talmage, Hopland, Cloverdale, Alexander Valley and northern Healdsburg. A thriving agricultural economy along the Russian River corridor, from Redwood Valley to Alexander Valley, is also dependent upon water stored in Lake Mendocino. More than 500,000 people are dependent upon the water diverted through the Potter Valley Project, stored in Lake Mendocino, and released into the Russian River.

Not only does the reduced storage in Lake Pillsbury impact beneficial water uses for power production, irrigation, municipal and domestic water use in the Russian River basin, but it also impacts the ability of Fishery Agencies to make mandatory, or discretionary, releases of stored water to enhance riverine habitats below both Van Arsdale Reservoir on the Upper Main Eel River and Lake Mendocino on the Russian River.

Based on the past few drought years it is clear that the NMFS RPA for the Potter Valley Project requires review. No model can anticipate all weather contingencies and the conditions we have recently experienced makes it very clear that the operation of the Potter Valley Project must be more flexible allowing appropriate reaction to changing seasonal conditions in the watershed. This past Spring, if the gates at Lake Pillsbury had been closed earlier when it became clear that the snow pack was very low and no more storms occurred, we may have avoided the need for another variance from the NMFS RPA. If this situation is not properly addressed, and dry warm Spring conditions persist, we will be faced with ongoing annual variance requests.

Please accept this correspondence from the MCIWPC as a formal MOTION TO INTERVENE in the matter of FERC 77-282.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Janet K.F. Pauli". The signature is written in black ink and is positioned below the "Respectfully Submitted," text.

Janet K.F. Pauli, Chairwoman

cc: Service list via email.

2.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document, via electronic transmission, to each person designated on the official service list compiled by the Secretary in this proceeding (FERC No. 77-282), as well as the applicant contact and affected resource agencies.

Executed in Ukiah, California, on August 12, 2016.

By Candace Horsley

A handwritten signature in black ink, appearing to read "C. Horsley". The signature is written in a cursive style with a large initial "C" and a long, sweeping underline.