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**COUNTY OF MENDOCINO
BOARD OF SUPERVISORS**

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August 3, 2017

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

Re: "COMMENTS ON THE POTTER VALLEY PROJECT NOTICE OF INTENT, PRE-APPLICATION DOCUMENT AND SCOPING DOCUMENT 1 FOR THE FEDERAL ENERGY REGULATORY COMMISSION PROJECT NUMBER P-77-285" Submitted by the County of Mendocino.

Dear Secretary Bose:

The County of Mendocino wishes to comment on the Notice of Intent, Pre-Application Document (PAD) and Scoping Document 1 (SD1) for the relicensing of Federal Energy Regulatory Commission (FERC) Project Number P-77-285 (Project). Mendocino is the only county within the region that has both the Eel and Russian River watersheds within its boundary and the Potter Valley Project (Project).

In the 1920s with the building of Scott Dam and the formation of Lake Pillsbury to generate electricity year round out of the Project a new water supply was provided for the region. Both watersheds are the primary source of water in their respective area for residents, businesses, agriculture and the environment. Therefore, the County of Mendocino has a unique role in the relicensing process and must put forth recommendations based upon our dependency on the water supply and water security for all beneficial uses in both of the watersheds.

In this process FERC intends to prepare an Environmental Impact Statement (EIS) evaluating the effects of relicensing the Potter Valley Project (Project) as proposed by Pacific Gas & Electric Company (PG&E), the project licensee, as well as any alternatives to the licensee's proposed action. Mendocino County agrees with the FERC's determination that the Federal Government Takeover, Non-Power License and Decommissioning alternatives should be eliminated from detailed study. It is an indisputable fact that the region's water supply is dependent upon the continuance of water provided from the entire Potter Valley Project infrastructure. If it is determined that these alternatives be considered an extensive EIS would be required to quantify the potentially devastating impacts to all of the communities dependent upon the Project's water in both the watersheds.

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Mendocino County strongly supports the Applicant's Proposal to continue to operate the Project as required by its existing license with the addition of language that includes the model assumptions National Marine Fisheries Service's (NMFS) Reasonable and Prudent Alternative (RPA) utilized during the recent past License Amendment. However, the FERC Final Order in 2004, following an extended License Amendment Proceeding, resulted in a reduction of the diversion from the Eel River through the Project's powerhouse by approximately 50% compared to the previous diversion rates ordered in License Article 38 in 1983. The County believes it was an unintended consequence, therefore, a reanalysis of the modeling assumptions can correct this particular situation during the relicensing process with an insertion of the previously agreed upon conditions for Section E.5 of the RPA.

Since the Project has been in place, water right permits have been granted by the State of California to hundreds of land owners and water agencies. The water stored and then released from Lake Pillsbury going downstream in the Eel or diverted through the Project tunnel has been applied for, permitted and licensed. Most importantly, impacts on existing water rights for any proposed decommissioning or deviation from the current diversion rates at the Project should be thoroughly analyzed.

The County of Mendocino is a member agency of the Mendocino County Inland Water and Power Commission (MCIWPC) and all of our member agencies are dependent upon the Project for their water supply. One of the agency members, the Potter Valley Irrigation District (PVID), is completely dependent upon the direct diversion of water below the Potter Valley Powerhouse. Mendocino County has reviewed and approved the MCIWPC written comment provided to FERC recently for the relicensing of the Project. In addition, the County has reviewed the written submission of the PVID and fully endorses their recommendations as well as the historical summary given of past relicensing actions and results.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Carre Brown", written in a cursive style.

Carre Brown, First District Supervisor
Mendocino County Board of Supervisors