



DEPARTMENT OF FISH AND WILDLIFE

Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



March 25, 2025

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

SUBJECT: REQUEST FOR THE FEDERAL ENERGY REGULATORY COMMISSION TO APPROVE PACIFIC GAS AND ELECTRIC COMPANY'S FEBRUARY 14, 2025, 2025 MINIMUM INSTREAM TEMPORARY FLOW AMENDMENT REQUEST (PROJECT NO, 77-214)

Dear Secretary Reese:

The California Department of Fish and Wildlife (CDFW) respectfully urges the Federal Energy Regulatory Commission (FERC) to immediately approve Pacific Gas and Electric Company's (PG&E) 2025 Minimum Instream Temporary Flow Amendment Request, dated February 14, 2025 (Temporary Amendment), for the Potter Valley Hydroelectric Project located on the Eel River and East Fork of the Russian River in Lake and Mendocino Counties, California. Approval will conserve as much cold water as possible in Lake Pillsbury for the protection of salmonids listed under the federal Endangered Species Act (ESA), designated critical habitat, and essential habitat for Pacific Coast Salmon within the Eel River.

Due to the seismic risk at Scott Dam, PG&E has elected to leave the spillway gates at Scott Dam open indefinitely, thereby reducing the storage capacity in Lake Pillsbury by approximately 20,000 acre-feet. This reduction in storage capacity has increased the urgency of timely approval of the Temporary Amendment.

PG&E's modeling comparison of the 2024 flow amendment flow scenario, as approved by FERC, and the existing license flow scenario shows an average decrease in maximum Eel River water temperature of about 1.8°C due to the 2024 temporary amendment. The average monthly temperatures for July, August, and September 2024 would have been 0.8°C, 2.3°C, and 0.3°C higher, respectively, had the 2024 temporary amendment not been approved. The number of days above 20°C decreased by 17 days (from 69 to 52) and the timing of peak water temperatures also shifted 21 days later, from August 20 to September 10.

Honorable Debbie-Anne A. Reese, Acting Secretary

Federal Energy Regulatory Commission

March 25, 2025

Page 2

PG&E also discussed the 2023 temporary amendment, where modified flows were implemented later in the season than during 2024 and previous years. In 2023, reservoir withdrawals remained elevated during the summer period, depleting the cool water pool and resulting in increased water temperatures in the Eel River. The delayed implementation of the 2023 variance contributed to a 2.5°C warmer maximum release temperature than in 2022, despite 2023 being a much wetter year, indicating early season management of Lake Pillsbury's cold-water storage is critical to meeting salmonid temperature requirements in the Eel River later in the season. Water temperatures in August and September of 2023 were very close to the lethal threshold for rearing steelhead trout of 23°C, with an observed peak of 22.6°C.

A rapid approval of the 2025 Temporary Amendment is necessary to avoid water temperatures approaching, meeting, or exceeding this lethal threshold again. For reasons outlined above, CDFW fully supports PG&E's Temporary Amendment request which will result in the conservation of the cold-water storage in Lake Pillsbury and improve cold water releases into the Eel River throughout the summer and fall of 2025 for the protection of ESA-listed salmonids. CDFW urges FERC to approve the implementation of the requested Temporary Amendment as soon as possible for the benefit of these species.

All communications, pleadings, and orders with respect to this proceeding should be sent to the following individuals.

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Sincerely,

DocuSigned by:

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Tina Bartlett, Regional Manager
Northern Region

Honorable Debbie-Anne A. Reese, Acting Secretary

Federal Energy Regulatory Commission

March 25, 2025

Page 3

ec: FERC Service List

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California Department of Fish and Wildlife