

Mendocino County Russian River Flood Control
& Water Conservation Improvement District

STAFF REPORT

To: Board of Trustees
From: E. Salomone, General Manager
Meeting: Monday, December 5, 2022
RE: Agenda Item 5: Water Supply Conditions Update & District Response

The Strategic Plan relevant priorities are: **Security** through ensuring reliable, resilient, and available sources of water; **Advocacy** in support of equitable water resource stewardship; and **Use** of water in effective and beneficial ways as a public resource, all in alignment with the District's Mission to steward water resources for the benefit of people and environment.

Inter-Basin Diversion of Water Through PG&E Owned "Potter Valley Project"

PG&E is still operating the inter-basin diversion through Potter Valley Project under a FERC Variance Order and convening the PG&E Drought Working Group (DWG) every two weeks to report on conditions. Additionally, and as per the Variance Order, DWG members may request an increase to the East Branch Russian River flows from 5 cubic feet per second (cfs) up to 25 cfs. Previous requests have been blocked through lack of consensus among DWG members.

On November 2, 2022, GM Salomone proposed an increase in the flow of any amount up to 25 cfs which was subsequently blocked. On November 9, 2022, GM Salomone and Janet Pauli, representing Potter Valley Irrigation District (PVID) and Mendocino County Inland Water & Power Commission (MCIWPC), submitted the **attached** joint proposal. As noted in the request, justification for flow increases are not required by the Variance Order, however, the letter supplied supporting points. The proposal was once again blocked.

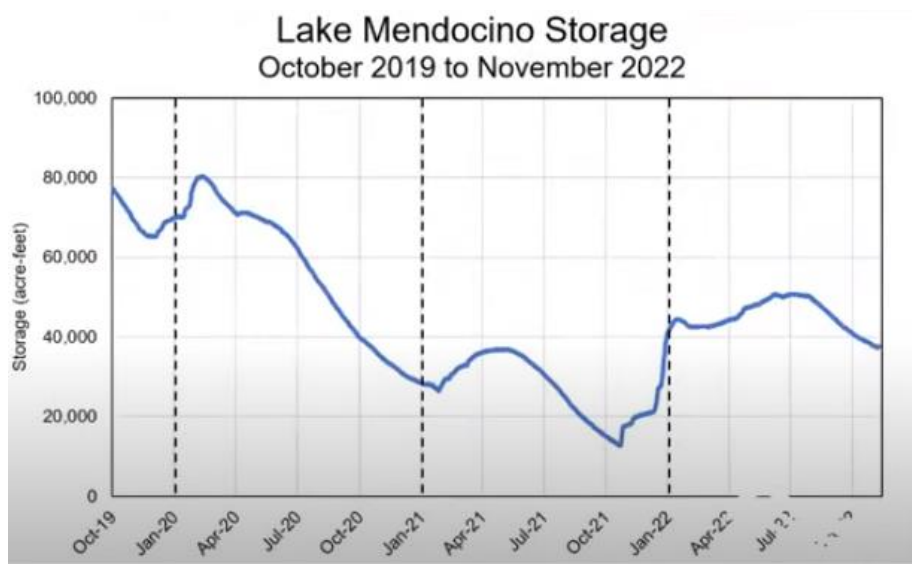
Due to the reduction in demand from the Potter Valley Irrigation District (PVID) on its contract with PG&E, diversions have dropped to and starting November 1, PG&E will divert 5 cfs for PVID and 5 cfs for the East Branch RR. The flow variance will remain in place until storage at Lake Pillsbury is at or exceeds 36,000 acre feet (af) at which time the minimum required flow in the East Fork RR will increase to 45 cfs.

Lake Mendocino and the Mainstem Upper Russian River

Lake Mendocino storage level on November 27, 2022 was 36,962 acre feet (af), down from 37,963 af on October 31, 2022.

(Continued...)

From the State Water Board Meeting of November 15, 2022:



Curtailments in the Upper Russian River

Due to forecasted precipitation in the watershed, the Division has extended temporary watershed-wide curtailment suspensions until December 5, 2022. Division staff will analyze anticipated water supplies in late November and the need for curtailment in December. The Division will publish an updated curtailment status list identifying curtailed diverters.

The Upper Russian River Voluntary Water Sharing Agreement Program

The Program continues to be suspended, however now due to lack of necessity rather than from the reduction in diversions from the Eel River to the East Branch Russian River above Lake Mendocino. Demands are down and sufficient natural and imported flow is available. The Steering Committee continues to focus efforts toward writing the first annual report, conducting a survey and adapting the Program for 2023 and beyond. Additionally, several Steering Committee members have been presenting on the Water Sharing Program. In November, GM Salomone was a panelist at the CA Education Foundation Water Summit in Sacramento, a California Environmental Water Network virtual workshop, and Association of California Water Agencies (ACWA) Fall Conference. GM Salomone has also been interviewed by several members of the press and working with other agencies and consultants in the State to provide information on the transferability of the Program to other regions.

District 2022 Water Supply

Sonoma Water filed a new Temporary Urgency Change Petition to the State Water Resources Control Board which would take effect as the current one expires, with no lapse. As has become the recent 'norm', flow requirements are set based on Lake Mendocino storage conditions rather than Lake Pillsbury. RRFC submitted the **attached** support letter and a copy of TUCP narrative can be found in the online meeting materials at <https://www.rrfc.net/board-meetings>.

District Response:

The District continues to operate under Declaration #22-01 Stage III: Water Warning, passed by the Board on October 3, 2022. Staff and Legal are considering an updated status for the January 2023 Board Meeting.

Sent to Jackie Pope, PG&E, Email: jhpl@pge.com
4:35 pm 11/9/22

Date: November 9, 2022

To: PG&E Drought Working Group

From: Elizabeth Salomone, Mendocino County Russian River Flood Control & Water Conservation Improvement District

And

Janet Pauli, Director, Potter Valley Irrigation District and Chair, Mendocino County Inland Water & Power Commission

RE: Proposal for flow increases to the East Branch Russian River

Russian River Flood Control District and Potter Valley Irrigation District formally request an increase of East Branch flows to 25 cfs as allowed in the FERC Variance Order. These PG&E Drought Working Group members also request **all members be prepared to submit votes at the next DWG meeting on Thursday, November 17, 2022,** using the week prior to that meeting for internal conferring.

Conditions the variance addressed have changed and no longer support justification for keeping the flow lower than the licensed requirement of 25 cfs. PG&E provided projections indicating Lake Pillsbury storage levels will not decline to levels that cause operational and dam safety impacts associated with critically low storage levels. Additionally, sufficient storage exists in Lake Pillsbury to maintain Eel River stream flows and block water releases and provide cold water for Eel River salmonid species.

Though justification for flow increases to the East Fork Russian River are not required by the Variance Order, the following points further support the request:

Helping Salmonids:

Using PG&E's most current Lake Pillsbury storage projection, the Potter Valley Project (PVP) Variance Order may be in place for another approximately 60 days. Over the next 60 days, about 2,500 acre-feet of additional water could be transferred through the PVP if the increased diversion request is granted. Assuming this water is stored in Lake Mendocino, the hydrologic condition on the Russian River could be classified as "dry" instead of "critical" resulting in higher minimum streamflow requirements. Higher stream flows could benefit adult salmonids returning to the Russian River to spawn. If drought conditions continue longer-term, hydrologic condition will remain critical this spring. Continued low storage levels in Lake Mendocino will constrain Sonoma Water's ability to make releases to improve smolt outmigration and store cold water for juvenile rearing.

Managing Risk at Lake Mendocino:

In late October, Sonoma Water submitted the sixth consecutive 180-day Temporary Urgency Change Petition to the State Board over the past three years. Lake Mendocino is a relatively small reservoir with very little, if any, carryover storage in most years. The reservoir needs to receive enough inflow from both precipitation/runoff in the watershed and PVP diversions every year to remain a reliable source of water. Winter diversions through the PVP have been reduced

substantially due to the PVP powerplant being non-operational. Lake Mendocino is now even more unreliable because of this reduction in diversions and the risk of dewatering Lake Mendocino has increased. A nominal increase in PVP diversions, as requested, can help reduce the risk of dewatering Lake Mendocino.

Meeting Health & Safety Needs:

Tens of thousands of people in the Russian River watershed rely at least in part on PVP diversions to meet their water supply needs. The requested increase in PVP diversions will help ensure that the health and safety needs of this population will be met.

Again, Russian River Flood Control District and Potter Valley Irrigation District formally request an increase of East Branch flows to 25 cfs as allowed in the FERC Variance Order. These PG&E Drought Working Group members also request **all members be prepared to submit votes at the next DWG meeting on Thursday, November 17, 2022,** using the week prior to that meeting for internal conferring.

Mendocino County

Russian River Flood Control & Water Conservation Improvement District

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November 8, 2022

Erik Ekdahl, Deputy Director of Water Rights
State Water Resources Control Board
Division of Water Rights
PO Box 2000
Sacramento, CA 95812-2000

Dear Mr. Ekdahl,

**RE: Support for Temporary Urgency Change filed October 28, 2022
for Permits 12947A, 12949, 12950, and 16596 held by Sonoma Water Agency**

The Mendocino County Russian River Flood Control and Water Conservation Improvement District (RRFC) supports State Water Resources Control Board (Water Board) expedited approval of Sonoma Water Agency's recently filed Petition for Temporary Urgency Change (TUCP.) It is vital there is no gap between the current Temporary Urgency Change Order and the implementation of a new order to protect the highly at-risk water storage supply for the Russian River Watershed.

The Water Board staff has been extremely active and engaging with stakeholders in the Russian River watershed for the last two years and is keenly aware of the current and future water supply issues addressed by the TUCP. The region is under extreme stress from extended and historical drought upon the water supply system for the Upper Russian River, combined with PG&E's drastic operational changes in the inter-basin diversion through Potter Valley Project. The TUCP is one of the most important tools for the Upper Russian River to effectively use a limited water supply. RRFC supports and applauds Sonoma Water for its continued diligence in responding by monitoring conditions, filing TUCPs, outreach & education, advocacy, and regional collaboration. Sonoma Water's efforts benefit all water uses and users in the Russian River watershed.

As described in the supplemental information Sonoma Water provided with the TUCP, using storage thresholds in Lake Mendocino as the hydrologic index to determine the water supply condition in the Russian River Watershed is a logical and critical distinction that reflects the current reality. Major reductions in the inter-basin diversions from the Eel River to the Russian River through Potter Valley Project have dramatically altered the historic relationship between the Russian River Watershed and Lake Pillsbury. TUCPs are the tool currently available to ensure sustainability of water supply reserves for the people and environment of the Russian River.

Water Code requires the Water Board to make the following four findings before issuing an order and RRFC believes all are more than sufficiently met, as summarized below:

- 1. The permittee or licensee has an urgent need to make the proposed change;**
The proposed changes are essential to help the region endure continued drought and significant reductions of diversions through the Potter Valley Project.

(Continued...)

2. The proposed change may be made without injury to any other lawful user of water;

The proposed changes will have far reaching effects in the region to protect essential water supply for environmental and human health and safety, as well as economic and other interests in the watershed.

3. The proposed change may be made without unreasonable effect upon fish, wildlife, or other instream beneficial uses; and

The proposed changes will increase the chances of health and survival for fish, wildlife, and other instream beneficial uses in a hostile prolonged drought.

4. The proposed change is in the public interest.

The proposed changes are an essential aspect of the protection of public interests reliant on Lake Mendocino storage and Russian River flows.

RRFC strongly supports the approval of Sonoma Water's petition to preserve storage in the reservoir that sustains beneficial uses throughout the dry summer months and into the potentially dry autumn and winter. RRFC also supports the efforts of Sonoma Water and the State Water Resources Control Board to develop an interim solution avoiding successive six month TUCPs until the Fish Flow Project can be finalized.

Russian River Flood Control thanks you for your consideration of these comments. It also extends sincere appreciation for the resources expended in the Russian River by the State Water Resources Control Board since 2020 and collaboration that bolsters the region's water security and resiliency.

Yours Sincerely,



Elizabeth Salomone
General Manager

Cc:

Samuel Boland-Brien: State Water Resources Control Board
Grant Davis, Pam Jeanne, Don Seymour, Todd Schram: Sonoma Water Agency
Mendocino County Board of Supervisors and CEO
Mendocino County Inland Water & Power Commission
County Water Districts (Willow, Millview, Calpella, Redwood Valley)
Water Suppliers (Potter Valley Irrigation, River Estates, Rogina Water, Hopland PUD)

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