

*Mendocino County Russian River Flood Control
& Water Conservation Improvement District*

General Manager's Report for April 2021

Presented at Regular Meeting of Monday, June 7, 2021

Priority 1: Secure (Water rights license, Reservoir, PVP)

See Agenda Item 5: Water Supply Condition Update & District Response.

Potter Valley Project: *The Federal Energy Regulatory Commission (FERC) issued scoping document 4 in the Project relicensing efforts.* The U.S. Department of Energy's Water Power Technologies Office held a virtual workshop, "Improving Discovery, Access, and Usability of Data for Basin-Scale River Management" after the development of a series of interactive stories about the various uses and values of water data developed. Potter Valley Project was a subject:

<https://storymaps.arcgis.com/stories/461623b21b7948ef8bacd9b34c51c5e4>

Reservoir Operations: Sonoma Water Agency filed at Temporary Urgency Change Petition in May. It commits to a 20% reduction in Russian River diversions, requests reduced minimum flow requirements in the lower Russian River, and other measures to more efficiently manage Project Water.

<https://www.sonomawater.org/tucp>

Priority 2: Use (Contracts & water sales, monitor & respond to regional water issues)

Customers & Water Sales: * "30 Min Thursday" with District GM continues to provide customers a forum to receive updates, ask questions, and offer feedback.

Drought Summit on Monday, May 10th: <https://www.youtube.com/watch?v=dCchAekZhas>

Drought Town Halls: <https://sd02.senate.ca.gov/video> Sonoma

Priority 3: Advocate (Stakeholder positions, participation with community partners, website, legislation)

(See last page of this report for updates on all community partner meetings attended this month.)

Groundwater Sustainability Agency (GSA): *The Board met on May 13th, 2021.

Materials: <https://www.mendocinocounty.org/government/affiliated-agencies/ukiah-valley-basin-gsa>

Recording: https://www.youtube.com/watch?v=PbtwF_1I-U4

* The GSA Technical Advisory Committee (TAC) met May 19th, 2021. Materials:

<https://www.mendocinocounty.org/government/affiliated-agencies/ukiah-valley-basin-gsa/technical-advisory-committee/tac-agenda-and-materials>

Priority 4: Administer (GM, Trustees, systems, financial)

Operations: The District Office continues to be closed to the public.

GM Professional Development: Attended Associated California Water Agencies (ACWA) Virtual Spring Conference.

Community Partner Meetings Attended This Month

Local Agency Formation Commission (LAFCo) (5/3/21): *Budget presentation was given and a public hearing held on the FY 2021-22 draft budget and work plan. An extensive discussion was held regarding staff time and costs in processing the work plan and applications. *The City of Ukiah appealed the determination of the LAFCo Executive Officer for the 2014 amended Ukiah Valley Sanitation District detachment application. The final approved motion was to postpone the item to allow additional time for staff review, including information on topics labeled "Staff Impasse" in the staff report. *Proposed policy amendment regarding indemnification agreements and application options was considered. Commission approved a voluntary

indemnification agreement. [Meeting Materials](#) and [YouTube video recording of meeting](#) More information: <https://www.mendolafco.org/>

Redwood Valley County Water District Special Meeting (5/4/21): Updates were provided on the drought, water supply, and responses. A motion was passed to implement a mandatory use restriction of 55 gallons per person per day. <http://willowcountywaterdistrict.org/redwood-valley>

Upper Russian River Water Agency (URRWA) Meeting (5/5/21): *Updates were provided on the drought, water supply, and responses, including the mandatory use reductions passed by Redwood Valley County Water District Board on May 4, 2021. *Discussion on the progression and next steps of potential consolidation was held. <http://willowcountywaterdistrict.org/urrwa>

LAFCo Workshop on SOI Update policies (5/11/21): The lengthy workshop went point by point through the LAFCo staff proposed changes to the SOI policies updates. It is expected additional workshops will be held on the policy development before the issue is brought to the full Commission. The City of Ukiah had a number of representatives in the meeting and dominated the discussion and focus, expressing their concern over the many applications and pre-applications they have in front of LAFCo. <https://www.mendolafco.org/>

Sonoma Board of Supervisors & Water Agency (5/11/21): An item on Water Supply Conditions and Actions Related to Drought Conditions was held as well as a public hearing on the Urban Water Management Plan 2020 and Water Storage Contingency Plan Public Hearing.

UV Sanitation District Meeting (5/12/21): The District discussed Upper Russian River Water Agency (URRWA) consolidation efforts with the interest in taking a lead in next steps. <https://www.uvzd.org/>

Hopland Public Utility District (5/13/21): Not able to attend – same time as IWPC. <http://willowcountywaterdistrict.org/hopland>

Inland Water & Power Commission (IWPC) (5/13/21): Updates were provided on a number of regular agenda items. The Temporary Variance of the flow release requirements for the PVP was discussed. <https://mendoiwpc.com/>

Willow County Water District (5/17/21): Emergency Conservation Resolution was adopted. Discussion on Bella Vista subdivision and consolidation efforts of URRWA districts was held. <http://willowcountywaterdistrict.org/willow>

Millview County Water District (5/17/21): Declaration of Emergency Water Shortage adopted. Well 35 filtration project on schedule to be operational by July. Extensive discussion was held around URRWA consolidation efforts and city of Ukiah relationship. Introduction of the Groundwater Sustainability Agency funding options was held. <http://willowcountywaterdistrict.org/millview>

Calpella County Water District (5/18/21): Did not attend. <http://willowcountywaterdistrict.org/calpella>

Redwood Valley County Water District (5/20/21): The Board received updates on drought conditions and water supply issues, the rate study, the infrastructure retrofit project, and appointed ad hoc members to meet with RRFC to discuss water resiliency. The Board decided to begin meeting in person for their Regular Board meetings in June, though the public will still access the meeting via Zoom. <http://willowcountywaterdistrict.org/redwood-valley>

Note: GM was not able to attend all meetings during May.

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Prepared and submitted to the Board of Trustees by: *Elizabeth Salomone, General Manager*



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Mendocino County

Russian River Flood Control & Water Conservation Improvement District

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June 4, 2021

Via Electronic Submittal (E-Filing)

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

Re: Potter Valley Project No. 77-306: COMMENTS and MOTION TO INTERVENE by the Mendocino County Russian River Flood Control and Water Conservation Improvement District regarding an Application by Pacific Gas and Electric Company for a Temporary Variance of Flow Requirements.

Dear Secretary Bose,

The Mendocino County Russian River Flood Control and Water Conservation Improvement District (District) is offering comments to describe the severe impact of the Temporary Variance of the Flow Requirements to water supply in the Russian River watershed.

The District was formed primarily to manage and put to beneficial use the approximately 8,000 acre feet of water allocated to Mendocino County from Lake Mendocino. The District has substantial water supply contracts with County Water Districts and Mutual Water Companies for municipal supply, as well as agricultural, commercial, and industrial users within our service area. Diversions from the Eel River through the Potter Valley Project (PVP) provide a substantial portion of this water, especially during the current historical drought when rainfall and runoff is at record lows. In fact, the State Water Resources Control Board in its D 1030, concluded that Eel River water was considered “natural flow” in the Russian River watershed because:

. . . of the special circumstances involving the long-continued diversion of water from the South Eel River to East Fork Russian River, the apparent naturalness and permanence of this water supply to lands in the Russian River Valley, and the very substantial economy that had grown and prospered for many years in reliance on that supply

At p. 35. It has been projected that without Project water, Lake Mendocino would not fill every year, with devastating effects on our economy and environment.

In December of 2020, the District requested to join PG&E’s Drought Working Group due to its dependence on the PVP diversion. Progress in developing a draft variance was abruptly halted when Lake Pillsbury storage levels improved. However, drought conditions worsened and when the Drought Working Group reconvened, members were informed that due to a threatened law suit and Section 7 Consultation, the proposed variance was drastically restructured from what was previously proposed. The District requests the commission expand requirements to PG&E to include noticing all stakeholders immediately when East Branch Russian River diversion changes are being considered and to recognize the District as a member of the Drought Working Group.

While the District recognizes and agrees that a variance from the license flow requirements is necessary due to the conditions being faced, it is alarmed at the disproportionate terms. Reducing only the flows to the East Branch Russian River and none to the Eel River has overburdened an already desperate water supply situation for the Russian River dependent fishery, environment, and communities. The District recognizes the need to protect PVP and Lake Mendocino infrastructure through this critically dry season and further notes that without the PVP, it is likely that there would be no natural flow below Van Arsdale Dam in a year like this one, just as there would be no flow in the East Fork of the Russian River. We ask that the Commission consider this in apportioning flow reductions from the Project to the two basins.

Numerous suppliers in the Russian River basin are or will be mandating 55 gallons per person per day water rations. Many farms are now completely cut off from their water source. Businesses and public services such as health care providers are required to meet major water use cutbacks while still struggling under pandemic impacts. Endangered species Act-listed species in the Russian River are at high risk due to quantity and quality of water releases when needed the most. The State Water Resources Control Board has taken measures to work with regional water users and suppliers in maximizing conservation and minimizing the devastating effects on our economy and environment. The projection of dewatering Lake Mendocino so often noted is the disaster that faces 600,000 Russian River watershed dependent users and the environment that provides them a home.

Severe reduction in flows to the Russian River will be far reaching. Challenges include water quality, both for wildlife and human consumption, lack of recharge to groundwater sources that will be under significantly higher demand, perennial crop and riparian vegetation stress, fire suppression supplies, reduced power production at Coyote Dam, and more.

The District urges careful consideration of PVP management and the extensive impacts to the Russian River watershed when East Branch Russian River diversion changes are being considered. While water supply was not the original driver for the Potter Valley Project, the vital by-product of power generation fueled the development of a water-dependent region serving environmental, residential, business, agricultural, industrial, and municipal beneficial uses. **Decisions made in isolation are not sustainable and the Federal Energy Regulatory Commission is in a position to lead in the cohesive management of our precious resources for environmental resiliency.**

Thank you for the opportunity to provide these formal COMMENTS on the temporary variance. This letter constitutes a MOTION TO INTERVENE pursuant to 18 CFS §385.214 (a)(2) by the Mendocino County Russian River Flood Control and Water Conservation Improvement District, a water rights agency, in the matter of FERC Project No. 77-306 regarding an Application by Pacific Gas and Electric Company for a Temporary Variance of Flow Requirements.

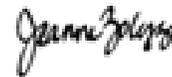
With respect,



Christopher Watt
President



Elizabeth Salomone
General Manager



Jeanne Zolezzi
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