

April 10, 2014

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 (FERC No. 77)
Variance Request to Enact "Emergency" Clause of Section E.5 of RPA**

Dear Secretary Bose:

Pacific Gas and Electric Company (PG&E) received a request from Redwood Valley County Water District (RVCWD) to enact the "emergency" clause of Section E.5 of the Reasonable and Prudent Alternative (RPA), which was made part of the Potter Valley Project (FERC No. 77) License by FERC Order issued January 28, 2004. Based on PG&E's conversations with FERC, it is PG&E's understanding that FERC believes enacting the "emergency" clause of Section E.5 of the RPA requires a variance request. This letter serves as a request for variance in order to enact the "emergency" clause of Section E.5 of the RPA.

Background

Due to the extremely dry conditions in the Russian River watershed, RVCWD is currently restricted to 25% of their normal water allocation. Due to the unusually low reservoir level, RVCWD is no longer entitled to draw water from Lake Mendocino. The Russian River Flood Control and Water Conservation District (RRFCD) was able to provide RVCWD with 335 ac-ft of water. Currently, RVCWD customers are limited to 50 gallons of water per person per day. As a result, RVCWD is requesting to implement the "emergency" clause of Section E.5 of the RPA to increase releases at E16 in order to provide RVCWD with water to meet customer needs.

Proposal

Under the "emergency" clause of Section E.5 of the RPA, RVCWD is requesting 800 ac-ft of water in order to get through the end of 2014 at a 20% conservation rate, which is consistent with voluntary regional conservation efforts. PG&E will provide this water by increasing flows in the East Branch Russian River, so long as water is available and all License and RPA required minimum flow requirements are met. PG&E will increase flows in the East Branch Russian River at a rate of approximately 40 cfs per hour. RVCWD will obtain this water from Lake Mendocino. If/when there is no longer water in excess of the

minimum flow requirements available to divert to the East Branch Russian River, PG&E will return to normal operations and cease providing water for RVCWD. Based on current flow conditions, PG&E anticipates that diversions will occur for approximately a week.

Consultation

As reflected in Enclosure 1, PG&E consulted via email and/or conference call with the National Marine Fisheries Service (NMFS), the California Department of Fish and Wildlife (CDFW), the Round Valley Indian Tribes (Tribes), the United States Fish and Wildlife Service (USFWS), the United States Forest Service (USFS), Friends of the Eel River (FOER), Environmental Protection Information Center (EPIC), and Potter Valley Irrigation District (PVID). All consulted were invited to participate in conference calls on Tuesday, April 8, 2014, and Wednesday, April 9, 2014. All consulted received a preliminary proposal via email on April 8, 2014 (not enclosed) and a final proposal via email on April 9, 2014.

PG&E has enclosed all comments received on the proposal. PG&E will supplement this filing with any additional comments received.

Emergency Conditions

Enclosure 2 includes documentation of the State of California and Mendocino County emergency conditions due to the ongoing drought. On January 17, 2014, California Governor Edmund G. Brown Jr. proclaimed a State of Emergency. On January 8, 2014, the Mendocino County Board of Supervisors adopted resolution No. 14-007 declaring a local emergency and imminent threat of disaster in Mendocino County due to drought conditions.

License Conditions

Below is a table summarizing the Potter Valley Project's current flow requirements.

Gage	Flow Requirement	Flow @1:30p on 4/9	Water Year Type	RPA Section
E-11, Cape Horn Dam	Floor = 100 cfs Cap = 200 cfs	370.0 cfs (min flow requirement is currently cap, 200cfs)	N/A – did not meet exceptionally low inflow criteria on 4/1	A.4
E-2, Scott Dam	40 cfs	316.3 cfs	Dry	B.1
E-16, East Branch Russian River*	4/1 – 4/14: 35 cfs 4/15 – 4/30: 25 cfs	44.6 cfs	Dry	C.1

*Does not include PVID water delivery obligations

Below is Section E.5 of the RPA, which allows increased flows at E16 due to "rare and brief emergency power and water demands."

E.5. Diversions in excess of the sum of the minimum flow MF16 [gage E16, East Branch Russian River] specified in Section C and the release to the Potter Valley Irrigation District specified in Section E.4 can only be made when the Lake Pillsbury Storage is above the Target Storage Curve. Exceptions to the rule can occur only due to rare and brief emergency power and water demands.

Given the receding flows, PG&E has a very short window of time in which this request can be operationally accommodated while still meeting all License and RPA required minimum flow requirements. PG&E appreciates FERC's expedited review of this urgent request.

If you have any questions concerning this matter, please call me at (415) 973-3076.

Sincerely,



Neva Geldard, License Coordinator
Hydro Licensing

Enclosure 1: Documentation of Agency Consultation:

- 4/8/14 Conference Call Invitation
- 4/9/14 Conference Call Invitation
- 4/9/14 Email proposal
- 4/9/14 Email of concurrence from California Department of Fish and Wildlife

Enclosure 2: Documentation of Emergency Conditions

- 1/17/14: California Governor's proclamation of a State of Emergency
- 4/9/14 Mendocino County Board of Supervisor Resolution No. 14-007 declaring local emergency

cc: Attached List

cc List:

Mr. Frank Blackett
San Francisco Regional Office
Federal Energy Regulatory Commission
901 Market Street, Suite 350
San Francisco, CA 94103

Mr. Matt Myers
California Department of Fish and Wildlife
Northern Region
601 Locust Street
Redding, CA 96001

Mr. Steve Kramer
U.S. Department of Interior
Fish and Wildlife Service
1655 Heindon Road
Arcata, CA 95521

Mr. Scott Williams
Berkey Williams LLP
2030 Addison Street, Suite 410
Berkeley, CA 94704

Mr. Lee Johnson
US Department of Agriculture, Forest Service
Upper Lake Ranger District
10025 Elk Mountain Road
Upper Lake, CA 95485

Mr. Scott Harris
California Department of Fish and Wildlife
P.O. Box 1690
Willits, CA 95490

Mr. Jeffery Jahn
National Marine Fisheries Service
777 Sonoma Ave. Suite 325
Santa Rosa, CA 95404

Ms. Stephanie Boggs
Natural Resources Department
Round Valley Indian Tribes
P.O. Box 277
243 East Covelo Road
Covelo, CA 95482

Enclosure 1

Geldard, Neva

Subject: Potter Valley Flow Discussion
Location: 1-866-489-0573; * 415-973-1646 *

Start: Tue 4/8/2014 10:00 AM
End: Tue 4/8/2014 11:00 AM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Parish, Dena
Required Attendees: Parish, Dena; 'Jeffrey Jahn - NOAA Federal'; Matt Myers; Steve Kramer (Steve_Kramer@fws.gov); Stephanie Boggs; Lee Johnson; Scott Harris; Dick Butler - NOAA Federal; Downie, Scott@Wildlife; 'swilliams@berkeywilliams.com'; Kubicek, Paul F; Keane, Clare; Joseph, Matthew; Pompati, Rick; Thoma, Alvin; Harris, Scott L.@Wildlife; Allan Renger (Allan.Renger@wildlife.ca.gov); Tony LaBanca (Tony.LaBanca@wildlife.ca.gov); Steiner, Park; 'GMRVCWD@Pacific.net'; Caliendo, Ian; 'jpauli@pauliranch.com'; gary@wildcalifornia.org; scott@eelriver.org
Optional Attendees: Beene, Tom; Geldard, Neva

Hello,

Please participate in a conference call to discuss an emergency request from the Redwood Valley Water District that would affect flows through the Potter Valley project on an interim basis (less than a week). We hope to include everyone in this call on Tuesday morning, but given the short notice we will hold additional calls if necessary to connect with involved stakeholders. Thank you all in advance for your time.

Respectfully,

Dena Parish

Desk (415) 973-0810

Cell (707) 267-8674

DYP2@pge.com

Please drive safely.



Before printing this email or any attachments, please think about your responsibility and commitment to the **ENVIRONMENT.**

**Potter Valley Project – FERC No. 77
April 8, 2014 Conference Call Attendees**

<u>Participation?</u>	<u>Name</u>	<u>Organization</u>
Yes	Dick Butler	NMFS
	Jeffry Jahn	NMFS
Yes	Zane Ruddy	NMFS
Yes	Scott Harris	CDFW
Yes	Matt Myers	CDFW
Yes	Allan Renger	CDFW
	Stephanie Boggs	RVIT
	Scott Williams	RVIT
Yes	Tom Beene	PG&E
	Michael Evans	PG&E
Yes	Neva Geldard	PG&E
Yes	Matthew Joseph	PG&E
Yes	Clare Keane	PG&E
Yes	Paul Kubicek	PG&E
	Rob Riedlinger	PG&E
Yes	Alvin Thoma	PG&E
Yes	Scott Greacen	FOER
Yes	David Keller	FOER
	Gary Hughes	EPIC
Yes	Bill Koehler	RVCWD
Yes	Janet Pauli	PVID

Geldard, Neva

Subject: Potter Valley Project Warm Water and Block Water Releases
Location: Conference Call 1-866-206-2831, meeting *415-973-3076*

Start: Wed 4/9/2014 11:00 AM
End: Wed 4/9/2014 12:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Geldard, Neva
Required Attendees: Allan Renger - CDFW (Allan.Renger@wildlife.ca.gov); Dick Butler - NMFS (dick.butler@noaa.gov); Jeffrey Jahn - NMFS (jeffrey.jahn@noaa.gov); Joseph, Matthew; Joshua Fuller - NMFS (joshua.fuller@noaa.gov); Keane, Clare; Kubicek, Paul F; Lee Johnson - FS <ljohnson03@fs.fed.us>; Matt Myers - CDFW <Matt.Myers@wildlife.ca.gov>; Pompati, Rick; Scott Harris - CDFW <slharris@dfg.ca.gov>; Scott Williams (swilliams@berkeywilliams.com); Stephanie Boggs - RVIT <sboggs@rvit.org>; Steve Kramer - USFWS (Steve_Kramer@fws.gov); Tony LaBanca - CDFW (Tony.LaBanca@wildlife.ca.gov); Zane Ruddy - NMFS (Zane.Ruddy@noaa.gov); Park Steiner (parksteiner@pacific.net); 'scott@eelriver.org'; 'gary@wildcalifornia.org'; Riedlinger, Rob; Evans, Michael; Vaught, T K; dkeller@eelriver.org; Bill Koehler - RVCWD (GMRVCWD@Pacific.net); llavallee@waterboards.ca.gov

Optional Attendees: Harris, Scott L.@Wildlife

Categories: Phone Call

Importance: High

The specific details of this meeting are not showing up for everyone. The meeting will be held tomorrow, Wednesday April 9, at 11am. The conference call number is 1-866-206-2831, meeting number *415-973-3076*.

All –

As discussed at the 2014 Annual Potter Valley Project Coordination Meeting, the purpose of this call is to discuss the possibility of warm water releases (Section B.3 of the RPA) and/or block water releases (Section D.1 of the RPA). In addition, we will be discussing the biological implications of Redwood Valley Water District's request to implement the "emergency" clause of Section E.5 of the RPA. For reference, the portions of the RPA we will be discussing are copied below. As requested during Tuesday's call regarding RVWD's request, Friends of the Eel River (FOER) and Environmental Protection Information Center (EPIC) have been invited to participate in this call.

B.3. PG&E shall continue to cooperate in releasing warm water from the spillway of Scott Dam in the later winter/early spring period to promote the timely downstream migration of juvenile Chinook salmon from the Eel River between Scott and Cape Horn Dams.

D.1. 2,500 ac-ft are reserved for release at the discretion of resource agencies each water year.

E.5. Diversions in excess of the sum of the minimum flow MF16 specified in Section C and the release to the Potter Valley Irrigation District specified in Section E.4 can only be made when the Lake Pillsbury Storage is above the Target Storage Curve. Exceptions to the rule can occur only due to rare and brief emergency power and water demands.

Neva Geldard

License Coordinator

Power Generation - Hydro Licensing

Pacific Gas & Electric Company

Phone: 415-973-3076/Cell: 415-407-4748

nmk2@pge.com

Potter Valley Project – FERC No. 77
April 9, 2014 Conference Call Attendees

<u>Participation?</u>	<u>Name</u>	<u>Organization</u>
Yes	Dick Butler	NMFS
Yes	Jeffry Jahn	NMFS
Yes	Zane Ruddy	NMFS
Yes	Scott Harris	CDFW
Yes	Matt Myers	CDFW
Yes	Allan Renger	CDFW
	Stephanie Boggs	RVIT
	Scott Williams	RVIT
	Tom Beene	PG&E
Yes	Michael Evans	PG&E
Yes	Neva Geldard	PG&E
Yes	Matthew Joseph	PG&E
Yes	Clare Keane	PG&E
Yes	Paul Kubicek	PG&E
Yes	Rob Riedlinger	PG&E
	Alvin Thoma	PG&E
Yes	Park Steiner	Steiner Consulting
Yes	Scott Greacen	FOER
Yes	David Keller	FOER
	Gary Hughes	EPIC
Yes	Bill Koehler	RVCWD
	Janet Pauli	PVID
Yes	Laura Lavalley	CA State Waterboard

Geldard, Neva

From: Geldard, Neva
Sent: Wednesday, April 09, 2014 1:42 PM
To: Allan Renger - CDFW (Allan.Renger@wildlife.ca.gov); Dick Butler - NMFS (dick.butler@noaa.gov); Jeffrey Jahn - NMFS (jeffrey.jahn@noaa.gov); Joseph, Matthew; Joshua Fuller - NMFS (joshua.fuller@noaa.gov); Keane, Clare; Kubicek, Paul F; Lee Johnson - FS <ljohnson03@fs.fed.us>; Matt Myers - CDFW <Matt.Myers@wildlife.ca.gov>; Pompati, Rick; Scott Harris - CDFW <slharris@dfg.ca.gov>; Scott Williams (swilliams@berkeywilliams.com); Stephanie Boggs - RVIT <sboggs@rvit.org>; Steve Kramer - USFWS (Steve_Kramer@fws.gov); Tony LaBanca - CDFW (Tony.LaBanca@wildlife.ca.gov); Zane Ruddy - NMFS (Zane.Ruddy@noaa.gov); David Keller - FOER (dkeller@eelriver.org); Scott Greacen - FOER (scott@eelriver.org); 'gary@wildcalifornia.org'; Janet Pauli; Bill Koehler - RVCWD (GMRVCWD@Pacific.net); Thoma, Alvin; Parish, Dena; Riedlinger, Rob; Beene, Tom
Subject: Potter Valley Project RVCWD Section E.5 Emergency Water Request
Attachments: 2014-01-07 Mendocino County Resolution 14-007 Drought Emergency.PDF; RVWD Water Use by Class 2008-2013.docx

Importance: High

All,

As discussed during today's conference call, below is a request from RVCWD for water under the "emergency" clause of Section E.5 of the RPA. Given the urgency of this request, please indicate as soon as possible your agency's or organization's stance on this request.

Background Information

Due to the extremely dry conditions in the Russian River watershed, Redwood Valley County Water District (RVCWD) is currently restricted to 25% of their normal water allocation. Due to the unusually low reservoir level, RVCWD is no longer entitled to draw water from Lake Mendocino. The Russian River Flood Control and Water Conservation District (RRFCD) was able to provide RVCWD with 335 ac-ft of water. Currently, RVCWD customers are limited to 50 gallons of water per person per day. As a result, RVCWD is requesting to implement the "emergency" clause of Section E.5 of the RPA to increase releases at E16 in order to provide RVCWD with water to meet customer needs.

On January 8, 2014, the Mendocino County Board of Supervisors adopted resolution No. 14-007 (attached) declaring a local emergency and imminent threat of disaster in Mendocino County due to drought conditions.

Proposal

Under the "emergency" clause of Section E.5 of the RPA, RVCWD is requesting 800 ac-ft of water in order to get through the end of 2014 at a 20% conservation rate, which is consistent with voluntary regional conservation efforts. PG&E will provide this water by increasing flows in the East Branch Russian River so long as water is available and all RPA-required minimum flow requirements are met. PG&E will increase flows in the East Branch Russian River at a rate of approximately 40 cfs per hour. RVCWD will obtain this water from Lake Mendocino. If/when there is no longer water in excess of the minimum flow requirements available to divert to the East Branch Russian River, PG&E will return to normal operations and cease providing water for RVCWD.

RVWD Usage Stats

Attached is a word document summarizing RVCWD customer water (broken out by domestic and agricultural) usage between 1/2008 and 3/2014. Notably, 2008 was an unusually frost prone year. The high diversion rate in January 2014

was due to customer concern that water would cease to be available for agricultural needs. Assuming a population of 4,000, in March 2014 RVCWD customers used approximately 45 gallons per person per day. If RVCWD's belief that the population is much higher than 4,000 is accurate, per person usage was less than 45 gallons per person per day.

As discussed during the call, the population assumption of 4,000 is derived based on the average rural population of Mendocino County. RVCWD believes they serve a population greater than 4,000.

Relevant License Conditions

Below is a table summarizing the Potter Valley Project's current flow requirements.

Gage	Flow Requirement	Flow @1:30p on 4/9	Water Year Type	RPA Section
E-11, Cape Horn Dam	Floor = 100 cfs Cap = 200 cfs	370.0 cfs (min flow requirement is currently cap, 200cfs)	N/A – did not meet exceptionally low inflow criteria on 4/1	A.4
E-2, Scott Dam	40 cfs	316.3 cfs	Dry	B.1
E-16, East Branch	4/1 – 4/14: 35 cfs	44.6 cfs	Dry	C.1
Russian River*	4/15 – 4/30: 25 cfs			

**Does not include PVID water delivery obligations*

Below is Section E.5 of the RPA, which allows increased flows at E16 due to “rare and brief emergency power and water demands”:

E.5. Diversions in excess of the sum of the minimum flow MF16 [gage E16, East Branch Russian River] specified in Section C and the release to the Potter Valley Irrigation District specified in Section E.4 can only be made when the Lake Pillsbury Storage is above the Target Storage Curve. Exceptions to the rule can occur only due to rare and brief emergency power and water demands.

If Proposal Is Approved, Ensuring RVCWD is Recipient of Released Water

Bill Koehler with RVCWD spoke with the General Manager of RRFCD and was told that RVCWD would be guaranteed the released water so long as it is specified that the water is an emergency transfer specifically for RVCWD.

Neva Geldard

License Coordinator
 Power Generation - Hydro Licensing
 Pacific Gas & Electric Company
 Phone: 415-973-3076/Cell: 415-407-4748
 nmk2@pge.com

RESOLUTION NO. 14-

RESOLUTION OF THE MENDOCINO COUNTY BOARD OF SUPERVISORS DECLARING LOCAL EMERGENCY AND IMMINENT THREAT OF DISASTER IN MENDOCINO COUNTY DUE TO DROUGHT CONDITIONS

WHEREAS, Mendocino County is now entering its second year of significant reduction of rain fall; and

WHEREAS, drought conditions and water delivery limitations have become worse in this second year of less than average rain fall, creating emergency conditions in Mendocino County; and

WHEREAS, Lake Mendocino storage remains at unprecedentedly low levels; and

WHEREAS, recently the City of Willits informally sought advice from the County Office of Emergency Services on whether or not to declare an emergency due to extremely low water availability to its municipal customers, and is poised to enact water rationing provisions on its January 8, 2014 City Council meeting to maintain what little water it has left; and

WHEREAS, on December 31, 2013, the State Water Resources Control Board agreed to change the ways it measures the hydrological index for the Russian River Watershed, meaning it ceases to use cumulative inflows to Lake Pillsbury which currently reflects only a "Dry" index and has now instead opted to use a realistic method of measurement to reflect "Critically Low" conditions in Lake Mendocino; and

WHEREAS, Ukiah Valley vintners and farmers depend on water from one and only one source of water, Lake Mendocino, for frost protection and watering of livestock. This supply is critically short, thus placing the local economy in a state of dire emergency if water runs out; and

WHEREAS, the entire Mendocino County economy is placed in great jeopardy because of the current water shortage due to its dependence on Lake Mendocino and Russian River water allocations, and must act proactively to prevent an imminent disaster; and

WHEREAS, due to drought conditions and the aforementioned regulatory constraints, it is unlikely that water currently in Lake Mendocino, the principal source of water for much of Mendocino County and the sole source of water for Redwood Valley, will be adequate to meet the essential water supply needs of the County's residents this summer and fall; and

WHEREAS, the adverse environmental, economic, and social impacts of the drought pose an imminent threat of disaster and threaten to cause widespread harm to people, businesses, property, communities, wildlife and recreation in Mendocino County.

NOW, THEREFORE, BE IT RESOLVED that the Mendocino County Board of Supervisors declares that a local emergency and imminent threat of disaster exists in Mendocino County due to drought conditions.

The foregoing Resolution introduced by Supervisor _____, seconded by Supervisor _____, and carried this _____ day of _____, 2014, by the following vote:

AYES:
NOES:
ABSENT:

WHEREUPON, the Chair declared said Resolution adopted and SO ORDERED.

ATTEST: CARMEL J. ANGELO
Clerk of the Board

JOHN PINCHES, Chair
Mendocino County Board of Supervisors

I hereby certify that according to the provisions of Government Code Section 25103, delivery of this document has been made.

Deputy

APPROVED AS TO FORM:
THOMAS R. PARKER, County Counsel

BY: CARMEL J. ANGELO
Clerk of the Board

Deputy

Redwood Valley County Water District

Water Usage by Class in AF

	Dom	Ag	Dom	Ag	Dom	Ag
	2008		2010		2012	
Jan	27.72	1.00	24.51	3.66	26.43	5.25
Feb	33.91	2.28	17.54	0.30	22.01	2.03
Mar	25.04	3.80	25.35	32.34	21.46	3.42
Apr	35.44	307.59	27.16	51.10	25.90	35.57
May	47.80	386.21	27.05	86.37	33.89	56.49
Jun	56.14	173.29	36.65	31.35	57.85	139.55
Jul	65.15	215.40	54.49	121.70	51.07	133.26
Aug	69.62	203.50	47.86	171.64	59.95	222.62
Sep	63.86	206.55	41.14	93.10	48.31	124.59
Oct	43.24	74.47	36.86	70.15	44.61	54.92
Nov	36.06	24.44	23.70	2.49	27.88	4.62
Dec	25.46	5.62	26.72	1.90	25.56	3.40
	2009		2011		2013	
Jan	35.16	2.73	21.99	1.23	27.49	1.43
Feb	23.81	196.75	19.61	1.64	22.17	1.06
Mar	20.68	17.55	21.40	5.84	22.63	25.88
Apr	26.33	136.10	24.72	139.22	27.65	77.88
May	24.80	220.00	29.87	56.86	43.51	55.84
Jun	28.40	28.30	44.91	42.92	52.52	101.79
Jul	35.47	79.57	43.31	98.90	60.09	183.88
Aug	35.98	117.53	54.90	183.95	53.65	164.31
Sep	47.46	110.41	49.11	129.82	52.22	91.82
Oct	26.08	5.91	32.03	22.60	36.48	56.41
Nov	26.00	6.24	26.62	30.48	30.59	15.04
Dec	25.11	8.79	23.71	3.88	32.72	30.90
					2014	
Jan					24.32	151.40
Feb					19.66	19.86
March					17.03	2.25

Geldard, Neva

From: Myers, Matt@Wildlife <Matt.Myers@wildlife.ca.gov>
Sent: Wednesday, April 09, 2014 4:27 PM
To: Geldard, Neva; Renger, Allan@Wildlife; Dick Butler - NMFS (dick.butler@noaa.gov); Jeffrey.Jahn@NOAA.GOV; Joseph, Matthew; Joshua Fuller - NMFS (joshua.fuller@noaa.gov); Keane, Clare; Kubicek, Paul F; Lee Johnson - FS <ljohnson03@fs.fed.us>; Pompati, Rick; Harris, Scott L.@Wildlife; Scott Williams (swilliams@berkeywilliams.com); Stephanie Boggs - RVIT <sboggs@rvit.org>; Steve Kramer - USFWS (Steve_Kramer@fws.gov); LaBanca, Tony@Wildlife; Zane Ruddy - NMFS (Zane.Ruddy@noaa.gov); David Keller - FOER (dkeller@eelriver.org); Scott Greacen - FOER (scott@eelriver.org); 'gary@wildcalifornia.org'; Janet Pauli; Bill Koehler - RVCWD (GMRVCWD@Pacific.net); Thoma, Alvin; Parish, Dena; Riedlinger, Rob; Beene, Tom
Subject: RE: Potter Valley Project RVCWD Section E.5 Emergency Water Request

Neva,

The California Department of Fish and Game (CDFW) concurs with the proposal as describe below. Please provide CDFW with the tracking of the 800 ac/ft once it is in place. If you have any questions, please contact me.

Matt Myers

Senior Environmental Scientist (Specialist)

California Department of Fish and Wildlife

601 Locust St

Redding, Ca 96001

Matt.Myers@wildlife.ca.gov

530-225-3846

From: Geldard, Neva [mailto:NMK2@pge.com]

Sent: Wednesday, April 09, 2014 1:42 PM

To: Renger, Allan@Wildlife; Dick Butler - NMFS (dick.butler@noaa.gov); Jeffrey.Jahn@NOAA.GOV; Joseph, Matthew@PGE; Joshua Fuller - NMFS (joshua.fuller@noaa.gov); Keane, Clare; pfk1@pge.com; Lee Johnson - FS <ljohnson03@fs.fed.us>; Myers, Matt@Wildlife; Pompati, Rick; Harris, Scott L.@Wildlife; Scott Williams (swilliams@berkeywilliams.com); Stephanie Boggs - RVIT <sboggs@rvit.org>; Steve Kramer - USFWS (Steve_Kramer@fws.gov); LaBanca, Tony@Wildlife; Zane Ruddy - NMFS (Zane.Ruddy@noaa.gov); David Keller - FOER (dkeller@eelriver.org); Scott Greacen - FOER (scott@eelriver.org); 'gary@wildcalifornia.org'; Janet Pauli; Bill Koehler - RVCWD (GMRVCWD@Pacific.net); Thoma, Alvin; Parish, Dena; Riedlinger, Rob; Beene, Tom

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Importance: High

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E-11, Cape Horn Dam	Floor = 100 cfs Cap = 200 cfs	370.0 cfs (min flow requirement is currently cap, 200cfs)	N/A – did not meet exceptionally low inflow criteria on 4/1	A.4
E-2, Scott Dam	40 cfs	316.3 cfs	Dry	B.1
E-16, East Branch Russian River*	4/1 – 4/14: 35 cfs 4/15 – 4/30: 25 cfs	44.6 cfs	Dry	C.1

**Does not include PVID water delivery obligations*

Below is Section E.5 of the RPA, which allows increased flows at E16 due to “rare and brief emergency power and water demands”:

E.5. Diversions in excess of the sum of the minimum flow MF16 [gage E16, East Branch Russian River] specified in Section C and the release to the Potter Valley Irrigation District specified in Section E.4 can only be made when the Lake Pillsbury Storage is above the Target Storage Curve. Exceptions to the rule can occur only due to rare and brief emergency power and water demands.

If Proposal Is Approved, Ensuring RVCWD is Recipient of Released Water

Bill Koehler with RVCWD spoke with the General Manager of RRFCD and was told that RVCWD would be guaranteed the released water so long as it is specified that the water is an emergency transfer specifically for RVCWD.

Neva Geldard

License Coordinator
Power Generation - Hydro Licensing
Pacific Gas & Electric Company
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Enclosure 2

A PROCLAMATION OF A STATE OF EMERGENCY

WHEREAS the State of California is experiencing record dry conditions, with 2014 projected to become the driest year on record; and

WHEREAS the state's water supplies have dipped to alarming levels, indicated by: snowpack in California's mountains is approximately 20 percent of the normal average for this date; California's largest water reservoirs have very low water levels for this time of year; California's major river systems, including the Sacramento and San Joaquin rivers, have significantly reduced surface water flows; and groundwater levels throughout the state have dropped significantly; and

WHEREAS dry conditions and lack of precipitation present urgent problems: drinking water supplies are at risk in many California communities; fewer crops can be cultivated and farmers' long-term investments are put at risk; low-income communities heavily dependent on agricultural employment will suffer heightened unemployment and economic hardship; animals and plants that rely on California's rivers, including many species in danger of extinction, will be threatened; and the risk of wildfires across the state is greatly increased; and

WHEREAS extremely dry conditions have persisted since 2012 and may continue beyond this year and more regularly into the future, based on scientific projections regarding the impact of climate change on California's snowpack; and

WHEREAS the magnitude of the severe drought conditions presents threats beyond the control of the services, personnel, equipment and facilities of any single local government and require the combined forces of a mutual aid region or regions to combat; and

WHEREAS under the provisions of section 8558(b) of the California Government Code, I find that conditions of extreme peril to the safety of persons and property exist in California due to water shortage and drought conditions with which local authority is unable to cope.

NOW, THEREFORE, I, EDMUND G. BROWN JR., Governor of the State of California, in accordance with the authority vested in me by the state Constitution and statutes, including the California Emergency Services Act, and in particular, section 8625 of the California Government Code **HEREBY PROCLAIM A STATE OF EMERGENCY** to exist in the State of California due to current drought conditions.

IT IS HEREBY ORDERED THAT:

1.State agencies, led by the Department of Water Resources, will execute a statewide water conservation campaign to make all Californians aware of the drought and encourage personal actions to reduce water usage. This campaign will be built on the existing Save Our Water campaign (www.saveourh20.org) and will coordinate with local water agencies. This campaign will call on

Californians to reduce their water usage by 20 percent.

2. Local urban water suppliers and municipalities are called upon to implement their local water shortage contingency plans immediately in order to avoid or forestall outright restrictions that could become necessary later in the drought season. Local water agencies should also update their legally required urban and agricultural water management plans, which help plan for extended drought conditions. The Department of Water Resources will make the status of these updates publicly available.

3. State agencies, led by the Department of General Services, will immediately implement water use reduction plans for all state facilities. These plans will include immediate water conservation actions, and a moratorium will be placed on new, non-essential landscaping projects at state facilities and on state highways and roads.

4. The Department of Water Resources and the State Water Resources Control Board (Water Board) will expedite the processing of water transfers, as called for in Executive Order B-21-13. Voluntary water transfers from one water right holder to another enables water to flow where it is needed most.

5. The Water Board will immediately consider petitions requesting consolidation of the places of use of the State Water Project and Federal Central Valley Project, which would streamline water transfers and exchanges between water users within the areas of these two major water projects.

6. The Department of Water Resources and the Water Board will accelerate funding for water supply enhancement projects that can break ground this year and will explore if any existing unspent funds can be repurposed to enable near-term water conservation projects.

7. The Water Board will put water right holders throughout the state on notice that they may be directed to cease or reduce water diversions based on water shortages.

8. The Water Board will consider modifying requirements for reservoir releases or diversion limitations, where existing requirements were established to implement a water quality control plan. These changes would enable water to be conserved upstream later in the year to protect cold water pools for salmon and steelhead, maintain water supply, and improve water quality.

9. The Department of Water Resources and the Water Board will take actions necessary to make water immediately available, and, for purposes of carrying out directives 5 and 8, Water Code section 13247 and Division 13 (commencing with section 21000) of the Public Resources Code and regulations adopted pursuant to that Division are suspended on the basis that strict compliance with them will prevent, hinder, or delay the mitigation of the effects of the emergency. Department of Water Resources and the Water Board shall maintain on their websites a list of the activities or approvals for which these provisions are suspended.

10. The state's Drinking Water Program will work with local agencies to identify communities that may

run out of drinking water, and will provide technical and financial assistance to help these communities address drinking water shortages. It will also identify emergency interconnections that exist among the state's public water systems that can help these threatened communities.

11. The Department of Water Resources will evaluate changing groundwater levels, land subsidence, and agricultural land fallowing as the drought persists and will provide a public update by April 30 that identifies groundwater basins with water shortages and details gaps in groundwater monitoring.

12. The Department of Water Resources will work with counties to help ensure that well drillers submit required groundwater well logs for newly constructed and deepened wells in a timely manner and the Office of Emergency Services will work with local authorities to enable early notice of areas experiencing problems with residential groundwater sources.

13. The California Department of Food and Agriculture will launch a one-stop website (www.cdffa.ca.gov/drought) that provides timely updates on the drought and connects farmers to state and federal programs that they can access during the drought.

14. The Department of Fish and Wildlife will evaluate and manage the changing impacts of drought on threatened and endangered species and species of special concern, and develop contingency plans for state Wildlife Areas and Ecological Reserves to manage reduced water resources in the public interest.

15. The Department of Fish and Wildlife will work with the Fish and Game Commission, using the best available science, to determine whether restricting fishing in certain areas will become necessary and prudent as drought conditions persist.

16. The Department of Water Resources will take necessary actions to protect water quality and water supply in the Delta, including installation of temporary barriers or temporary water supply connections as needed, and will coordinate with the Department of Fish and Wildlife to minimize impacts to affected aquatic species.

17. The Department of Water Resources will refine its seasonal climate forecasting and drought prediction by advancing new methodologies piloted in 2013.

18. The California Department of Forestry and Fire Protection will hire additional seasonal firefighters to suppress wildfires and take other needed actions to protect public safety during this time of elevated fire risk.

19. The state's Drought Task Force will immediately develop a plan that can be executed as needed to provide emergency food supplies, financial assistance, and unemployment services in communities that suffer high levels of unemployment from the drought.

20. The Drought Task Force will monitor drought impacts on a daily basis and will advise me of

subsequent actions that should be taken if drought conditions worsen.

I FURTHER DIRECT that as soon as hereafter possible, this Proclamation be filed in the Office of the Secretary of State and that widespread publicity and notice be given of this Proclamation.

IN WITNESS WHEREOF I have hereunto set my hand and caused the Great Seal of the State of California to be affixed this 17th day of January, 2014.

EDMUND G. BROWN JR.,
Governor of California

ATTEST:

DEBRA BOWEN,
Secretary of State

RESOLUTION NO. 14-

RESOLUTION OF THE MENDOCINO COUNTY BOARD OF SUPERVISORS DECLARING LOCAL EMERGENCY AND IMMINENT THREAT OF DISASTER IN MENDOCINO COUNTY DUE TO DROUGHT CONDITIONS

WHEREAS, Mendocino County is now entering its second year of significant reduction of rain fall; and

WHEREAS, drought conditions and water delivery limitations have become worse in this second year of less than average rain fall, creating emergency conditions in Mendocino County; and

WHEREAS, Lake Mendocino storage remains at unprecedentedly low levels; and

WHEREAS, recently the City of Willits informally sought advice from the County Office of Emergency Services on whether or not to declare an emergency due to extremely low water availability to its municipal customers, and is poised to enact water rationing provisions on its January 8, 2014 City Council meeting to maintain what little water it has left; and

WHEREAS, on December 31, 2013, the State Water Resources Control Board agreed to change the ways it measures the hydrological index for the Russian River Watershed, meaning it ceases to use cumulative inflows to Lake Pillsbury which currently reflects only a "Dry" index and has now instead opted to use a realistic method of measurement to reflect "Critically Low" conditions in Lake Mendocino; and

WHEREAS, Ukiah Valley vintners and farmers depend on water from one and only one source of water, Lake Mendocino, for frost protection and watering of livestock. This supply is critically short, thus placing the local economy in a state of dire emergency if water runs out; and

WHEREAS, the entire Mendocino County economy is placed in great jeopardy because of the current water shortage due to its dependence on Lake Mendocino and Russian River water allocations, and must act proactively to prevent an imminent disaster; and

WHEREAS, due to drought conditions and the aforementioned regulatory constraints, it is unlikely that water currently in Lake Mendocino, the principal source of water for much of Mendocino County and the sole source of water for Redwood Valley, will be adequate to meet the essential water supply needs of the County's residents this summer and fall; and

WHEREAS, the adverse environmental, economic, and social impacts of the drought pose an imminent threat of disaster and threaten to cause widespread harm to people, businesses, property, communities, wildlife and recreation in Mendocino County.

NOW, THEREFORE, BE IT RESOLVED that the Mendocino County Board of Supervisors declares that a local emergency and imminent threat of disaster exists in Mendocino County due to drought conditions.

The foregoing Resolution introduced by Supervisor _____, seconded by Supervisor _____, and carried this _____ day of _____, 2014, by the following vote:

AYES:
NOES:
ABSENT:

WHEREUPON, the Chair declared said Resolution adopted and SO ORDERED.

ATTEST: CARMEL J. ANGELO
Clerk of the Board

Deputy

APPROVED AS TO FORM:
THOMAS R. PARKER, County Counsel

JOHN PINCHES, Chair
Mendocino County Board of Supervisors

I hereby certify that according to the provisions of Government Code Section 25103, delivery of this document has been made.

BY: CARMEL J. ANGELO
Clerk of the Board

Deputy