

July 2016 PVID email in support of PG&E Variance Request

The Board of Directors of the Potter Valley Irrigation District reluctantly supports Pacific Gas and Electric Company's (PG&E) Potter Valley Project (FERC No. 77) 2016 Flow Variance Request due to Limited Water availability with the following comments.

After receiving over 52 inches of rain this past winter season we assumed that, based on cumulative inflow, Lake Pillsbury storage would be classified as normal thus precluding another year where a variance from the National Marine Fisheries Service Reasonable and Prudent Alternative (NMFS RPA) flow schedule would be necessary. However, due to poor snow accumulations, Lake Pillsbury did not fill to an adequate level. The Board believes that the gates at Lake Pillsbury could have been closed earlier if more attention had been paid to the low snow pack measurements coupled with a lack of any projections of significant storms. If a request to close the gates had been made to the Division of Safety of Dams earlier we might have been able to avoid this variance request. This mistake in judgment will impact all beneficial users of the stored water in Lake Pillsbury for the upcoming 2016 summer and fall season. Not only does this impact beneficial water uses for power production, irrigation and appropriative water rights on the Russian River, but it also potentially impacts the ability of Fishery Agencies to release stored water for migration flows which could be used to enhance the fishery habitats below both Van Arsdale Reservoir on the Upper Main Eel River and Lake Mendocino on the Russian River.

While the Potter Valley Irrigation District is not responsible for water rights that have been granted by the State Water Resources Control Board (SWRCB) along the East Branch of the Russian River (EBRR) from the Potter Valley Powerhouse to Lake Mendocino, we are concerned that the landowners in Potter Valley that hold Appropriative rights to the diverted water have been poorly represented in past discussions of flow reductions. We understand that PG&E holds the senior Appropriative water right to the diverted Eel River water, however, the SWRCB has granted Appropriative rights to the water released below the Potter Valley Powerhouse and some of those rights have been licensed since the 1940s. Some consideration of these licensed rights should be included in further negotiations. This year the variance request leave the flows on the Upper Main Eel River as a Wet Year Classification for the duration of the summer and the EBRR will be reduced to a Dry Year Classification to protect storage in Lake Pillsbury.

Potter Valley Irrigation District will once again be working very closely with PG&E operators to coordinate releases at E-16 to closely match our delivery demands for the 2016 irrigation season. Our contracted delivery flow rates and the amount of storage in Lake Pillsbury allotted to us is unchanged. We do not expect to curtail deliveries to our customers, as was necessary last summer during the severe drought, however, we will endeavor to protect storage at Lake Pillsbury to the best of our ability.

We look forward to continuing to participate in the Potter Valley Drought Working Group and working collaboratively with all of the Stakeholders to protect our shared water resource.