Sonoma Water

October 3, 2025

Juliet Christian-Smith, Deputy Director of Water Rights
State Water Resources Control Board
Division of Water Rights
P.O. Box 2000
Sacramento, CA 95812-2000

RE: PETITIONS FOR TEMPORARY URGENCY CHANGE—PERMITS 12947A, 12949, 12950, AND 16596

Dear Ms. Christian-Smith:

Enclosed are Petitions for Temporary Urgency Change to modify the criteria for establishing the water supply conditions for the Russian River watershed that were established by Decision 1610 for Permits 12947A, 12949, 12950 and 16596. Accompanying the petitions are the following:

1. *Supplement to the October 2025 Temporary Urgency Change Petition*
2. *Environmental Information for Petitions*
3. Notice of Exemption
4. California Department of Fish and Wildlife Review Fee Payment
5. State Water Resources Control Board Petition Fee Payment

These petitions are submitted due to changes in the operation by PG&E of the Potter Valley Project. The hydrologic index that defines the water supply condition in the Russian River watershed is inadequate to determine actual conditions due to its reliance on Lake Pillsbury cumulative inflow and the assumption of Potter Valley Project historical transfers of Eel River water to the East Fork of the Russian River. These petitions request changes that are the same as approved most recently by the State Water Resources Control Board in an order issued on June 27, 2025, which remains active through December 23, 2025. This request for an alternate hydrologic index based on Lake Mendocino storage levels originates during the drought of 2013-2015, was used again during the drought of 2020-2022, and now requested to address changes attributed to the Potter Valley Project.

I look forward to working with the Division of Water Rights staff on this important conservation effort.

Sincerely,

Kent Gylfe
Director of Engineering

C: J. Ling, K. Emanuel – State Water Resources Control Board
J. Fuller – National Marine Fisheries Service
D. Hines - California Department of Fish & Wildlife
B. McFadin, V. Quinto – North Coast Regional Water Quality Control Board
G. Davis, D. Seymour, T. Schram, J. Martini-Lamb, D. Manning, D. Royall – Sonoma Water
C. O'Donnell, A. Brand, V. Ball – Sonoma County Counsel
R. Bezerra – Bartkiewicz, Kronick & Shanahan

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Please Indicate County where your project is located here:

Sonoma / Mendo.

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PETITION FOR CHANGE

Separate petitions are required for each water right. Mark all areas that apply to your proposed change(s). Incomplete forms may not be accepted. Location and area information must be provided on maps in accordance with established requirements. (Cal. Code Regs., tit. 23, § 715 et seq.) Provide attachments if necessary.

☐ **Point of Diversion** Wat. Code, § 1701 ☐ **Point of Rediversion** Cal. Code Regs., tit. 23, § 791(e) ☐ **Place of Use** Wat. Code, § 1701 ☐ **Purpose of Use** Wat. Code, § 1701

☐ **Distribution of Storage** Cal. Code Regs., tit. 23, § 791(e) ☒ **Temporary Urgency** Wat. Code, § 1435 ☐ **Instream Flow Dedication** Wat. Code, § 1707 ☐ **Waste Water** Wat. Code, § 1211

☐ **Split** Cal. Code Regs., tit. 23, § 836 ☐ **Terms or Conditions** Cal. Code Regs., tit. 23, § 791(e) ☐ **Other**

Application 15736 Permit 12949 License Statement

I (we) hereby petition for change(s) noted above and described as follows:

Point of Diversion or Rediversion – Provide source name and identify points using both Public Land Survey System descriptions to ¼-¼ level and California Coordinate System (NAD 83).

Present:

Proposed:

Place of Use – Identify area using Public Land Survey System descriptions to ¼-¼ level; for irrigation, list number of acres irrigated.

Present:

Proposed:

Purpose of Use

Present:

Proposed:

Split

Provide the names, addresses, and phone numbers for all proposed water right holders.

In addition, provide a separate sheet with a table describing how the water right will be split between the water right holders: for each party list amount by direct diversion and/or storage, season of diversion, maximum annual amount, maximum diversion to offstream storage, point(s) of diversion, place(s) of use, and purpose(s) of use. Maps showing the point(s) of diversion and place of use for each party should be provided.

Distribution of Storage

Present:

Proposed:

Temporary Urgency
This temporary urgency change will be effective from December 24, 2025 to June 21, 2026 .

Include an attachment that describes the urgent need that is the basis of the temporary urgency change and whether the change will result in injury to any lawful user of water or have unreasonable effects on fish, wildlife or instream uses.

Instream Flow Dedication – Provide source name and identify points using both Public Land Survey System descriptions to ¼-¼ level and California Coordinate System (NAD 83).

Upstream Location:

Downstream Location:

List the quantities dedicated to instream flow in either: ☐ cubic feet per second or ☐ gallons per day:

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

Will the dedicated flow be diverted for consumptive use at a downstream location? ◯ Yes ◯ No
If yes, provide the source name, location coordinates, and the quantities of flow that will be diverted from the stream.

Waste Water
If applicable, provide the reduction in amount of treated waste water discharged in cubic feet per second.

Will this change involve water provided by a water service contract which prohibits your exclusive right to this treated waste water? ◯ Yes ◯ No

Will any legal user of the treated waste water discharged be affected? ◯ Yes ◯ No

General Information – For all Petitions, provide the following information, if applicable to your proposed change(s).

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I (we) have access to the proposed point of diversion or control the proposed place of use by virtue of:
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All Right Holders Must Sign This Form: I (we) declare under penalty of perjury that this change does not involve an increase in the amount of the appropriation or the season of diversion, and that the above is true and correct to the best of my (our) knowledge and belief. Dated 10/3/2025 at Santa Rosa, CA .

Right Holder or Authorized Agent Signature

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☐ **Split** Cal. Code Regs., tit. 23, § 836 ☐ **Terms or Conditions** Cal. Code Regs., tit. 23, § 791(e) ☐ **Other**

Application 12919A Permit 12947A License Statement

I (we) hereby petition for change(s) noted above and described as follows:

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Present:

Proposed:

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Purpose of Use

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☐ **Split** Cal. Code Regs., tit. 23, § 836
☐ **Terms or Conditions** Cal. Code Regs., tit. 23, § 791(e)
☐ **Other**

Application 15737 Permit 12950 License _____ Statement _____

I (we) hereby petition for change(s) noted above and described as follows:

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Proposed:

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Purpose of Use

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☐ **Split** Cal. Code Regs., tit. 23, § 836
☐ **Terms or Conditions** Cal. Code Regs., tit. 23, § 791(e)
☐ **Other**

Application 19351 Permit 16596 License Statement

I (we) hereby petition for change(s) noted above and described as follows:

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Purpose of Use

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Sonoma County Water Agency

Supplement to the October 2025 Temporary Urgency Change Petitions

The Sonoma County Water Agency (Sonoma Water) seeks temporary urgency changes to its four water-right permits used to provide wholesale water to cities and water districts in Sonoma and Marin Counties. These changes are necessary to ensure that the water supply condition and corresponding minimum instream flow requirements in the Russian River watershed are aligned with actual watershed hydrologic conditions. This is essential to maintain sustainable reservoir and river operations to protect municipal water supply and listed salmon species in the Russian River.

Based on Sonoma Water's water right permits' terms established under State Water Resources Control Board (State Water Board) Decision 1610, the water supply condition for the Russian River is determined using cumulative inflow into Lake Pillsbury as the hydrologic index. Lake Pillsbury is a storage reservoir located in the Eel River watershed, which is part of Pacific Gas & Electric Company's (PG&E) Potter Valley Hydroelectric Project (PVP). Operation of the PVP results in a transfer of Eel River water into the East Fork of the Russian River (East Fork), upstream of Lake Mendocino. The PVP operated under a Federal Energy Regulatory Commission (FERC) license that expired on April 14, 2022, and the PVP now continues operations under annual licenses while PG&E proceeds through license surrender and decommissioning. An initial plan and schedule were approved by FERC on July 29, 2022, and revised in June 2024 based on PG&E's requested schedule extension. On January 31, 2025, PG&E released a Draft Surrender Application; the Final Surrender Application was filed with FERC on July 29, 2025. FERC's license-surrender proceedings will likely take years before PVP operations and long-term rules governing any imports to the Russian River watershed are resolved.

Since 2021, a transformer bank failure at the PVP powerhouse has resulted in significant reductions in Eel River transfers into the Russian River. This failure caused PVP hydropower generation to cease and, with it, all associated discretionary transfers of Eel River water to the East Fork. With the plans to surrender the license and decommission the project, PG&E announced in March 2023 that the transformer would not be replaced, permanently ending hydropower operations.

With hydropower operations no longer occurring at the project, PG&E has stated that discretionary transfers beyond its FERC license and contract obligations will not be made.

As a result, discretionary transfers of Eel River water to the East Fork have been reduced by up to 456 acre-feet per day[1].

Additionally, on July 31, 2023, PG&E submitted a long-term flow regime request to modify flow requirements under the current FERC license. To reduce the potential seismic risk at Lake Pillsbury's Scott Dam, PG&E made the decision to keep the spillway gates open atop Scott Dam indefinitely, reducing the water storage capacity in Lake Pillsbury by approximately 20,000 acre-feet. Consequently, PG&E claims that Lake Pillsbury can no longer sustain normal operations under the current license terms. PG&E has proposed a reduction in the minimum release flow requirements for the East Fork flows starting in 2024 until project decommissioning is complete. The long-term flow regime request is still under review by FERC. On January 30, 2025, as part of this process, PG&E submitted a Non-Capacity License Amendment application as requested by FERC.

While the license amendment request is under FERC review, PG&E will continue with annual requests for a temporary variance of flow requirements due to the seismic risk at Scott Dam and its decision to no longer close the spillway gates. On August 4, 2025, FERC issued an order approving PG&E's February 14, 2025 variance request. FERC approved changes to the minimum release flows in the Eel River and the East Fork that included: (1) a reduction in minimum release flow requirements for the Eel River below Scott Dam to the critical water year classification requirement of 20 cfs; (2) a reduction in minimum release flow requirements for the East Fork immediately from 75 cfs to 25 cfs and an authorized reduction to 5 cfs if water temperatures of Lake Pillsbury releases exceeded 15 degrees Celsius; (3) the minimum release flow requirement for the East Fork to increase on September 30 to 25 cfs and remain there while the FERC order is in effect. Post September 30, reductions to the East Fork may be implemented if PG&E forecasts storage in Lake Pillsbury to drop below 12,000 acre-feet. The order will terminate upon storage in Lake Pillsbury exceeding 36,000 acre-feet after October 1.

Since the variance order went into effect on August 4, PG&E has been operating the project with a minimum release flow of 5 cfs to the East Fork as Lake Pillsbury release temperatures were exceeding the threshold of 15 degrees Celsius. Total transfers by

[1] PVP has design flow capacities of up to 240 cubic feet per second (cfs) through the powerhouse for power generation and up to 135 cfs through the powerhouse bypass to meet FERC license requirements for minimum release flows into the East Fork of the Russian River and water supply contract requirements with the Potter Valley Irrigation District.

PG&E under the order are based on requested water supply deliveries by Potter Valley Irrigation District, the East Fork minimum release flow and a buffer flow of 5 cfs.

As described above, multiple changes to the PVP operations have reduced and could further reduce the transfers of Eel River water into the Russian River. The historical link of the two watersheds on which Decision 1610 is based is no longer applicable. The hydrologic index of Decision 1610 is no longer a reliable metric for Russian River water supply conditions without the historical large inter-basin transfer and will not function as intended. While the Lake Pillsbury watershed on the Upper Eel River and the Upper Russian River are adjacent basins, the hydrologic conditions can be quite different. For example, in water year 2021, Lake Mendocino experienced the second driest year on record for the Ukiah Valley (period of record: 128 years), unequivocally a 'Critical' water supply condition. However, based on the cumulative inflow to Lake Pillsbury, water supply conditions in the Russian River were classified as *Normal* on January 1, 2021, and *Dry* on February 1, which remained the designated water supply condition for the rest of the calendar year.

Over a month, the difference between water needed for a *Normal* water supply condition and a *Dry* condition to maintain instream flow requirements is almost 4,500 acre-feet under the winter minimum instream flow requirements of Decision 1610. Under spring and summer requirements, the monthly difference amounts to over 6,500 acre-feet. Year-round, the additional amount of water needed between a *Dry* water supply condition and a *Critical* condition to maintain instream flow requirements is nearly 3,000 acre-feet over a month.

The importance of these monthly differentials between the water supply conditions is best exemplified by the recent 2020-2022 drought that highlighted the diligence needed to prevent the complete draining of Lake Mendocino. In February 2020, Lake Mendocino was above the water conservation pool and at the top of the Forecast Informed Reservoir Operations (FIRO) pool of 80,050 acre-feet. Over the next 20 months, the Russian River watershed experienced a severe drought and Lake Mendocino storage levels declined to 12,864 acre-feet in October 2021, despite Sonoma Water filing temporary urgency change petitions to drastically reduce minimum instream flow requirements and the State Water Board curtailing over 1,800 riparian claims and appropriative water rights. In 2021, the hydrologic index under Decision 1610 established minimum instream flow requirements for a *Dry* water supply condition. Using the Lake Mendocino storage threshold-based hydrologic index that went into effect with the temporary urgency change order dated February 4, 2021, a *Critical* water supply condition was established. The change in water supply condition designation and the subsequent temporary urgency change order dated

June 14, 2021, continued the minimum instream flows under a *Critical* water supply condition. This conserved 25,785 acre-feet of water by the time that Lake Mendocino reached minimum storage for the year at 12,864 acre-feet on October 23, 2021.

Under the current Decision 1610 hydrologic index, the applicable minimum instream flow requirements may require releases of water from Lake Mendocino and Lake Sonoma at unsustainable levels if the Russian River watershed experiences significantly less rainfall than the Lake Pillsbury watershed. Given the changes to PVP operations, the influence of the Eel River water imports on downstream hydrologic conditions in the Russian River is greatly diminished. Therefore, cumulative inflow into Lake Pillsbury is no longer an appropriate metric to assess the hydrologic conditions in the Russian River watershed. Consequently, Sonoma Water requests that storage thresholds in Lake Mendocino to be used as the hydrologic index to determine the water supply condition in the Russian River watershed upon which minimum instream requirements are based. This requested approach has been approved in previous orders by the State Water Board with the most recent order dated June 27, 2025. Under the current temporary urgency change petitions request, the storage thresholds are the same as those that were developed in 2023 and used in 2024 and 2025. The 2023 updated thresholds incorporated new operational conditions in the Russian River watershed and a new methodology (see Section 4.0).

1.0 BACKGROUND

Sonoma Water controls and coordinates water supply releases from Lake Mendocino and Lake Sonoma to implement the minimum instream flow requirements in water rights Decision 1610, which the State Water Board adopted on April 17, 1986. Decision 1610 specifies minimum flow requirements for the Upper Russian River, Dry Creek and the Lower Russian River[2]. These minimum flow requirements vary based on water supply conditions, which are also specified in Decision 1610. The Decision 1610 requirements for the Upper Russian River and Lower Russian River are contained in term 20 of Sonoma Water's water-right Permit 12947A (Application 12919A). The Decision 1610 requirements for the Lower Russian River are contained in term 17 of Sonoma Water's water-right Permit 12949 (Application 15736) and term 17 of Sonoma Water's water-right Permit

[2] The Upper Russian River is the stream reach from the confluence of the East Fork of the Russian River and West Fork of the Russian River to the Russian River's confluence of Dry Creek. The Lower Russian River is the stream reach from the confluence of Dry Creek and the Russian River to the Pacific Ocean.

12950 (Application 15737). The Decision 1610 requirements for Dry Creek and the Lower Russian River are contained in term 13 of Sonoma Water's water-right Permit 16596 (Application 19351).

Sonoma Water's operations are also subject to the Russian River Biological Opinion issued by the National Marine Fisheries Service on April 29, 2025 (2025 Russian River Biological Opinion), which succeeds the previous Biological Opinion issued on September 24, 2008.

1.1 MINIMUM FLOW REQUIREMENTS

Decision 1610 requires a minimum flow of 25 cubic feet per second (cfs) in the East Fork from Coyote Valley Dam to the confluence with the West Fork of the Russian River (West Fork) under all water supply conditions. From this point downstream to Dry Creek, the Decision 1610 required minimum flows in the Russian River are 185 cfs from April through August and 150 cfs from September through March during *Normal* water supply conditions, 75 cfs during *Dry* conditions and 25 cfs during *Critical* conditions. Decision 1610 further specifies two variations of the *Normal* water supply condition, commonly known as *Dry Spring 1* and *Dry Spring 2*. These conditions provide for lower minimum flow requirements in the Upper Russian River during times when the combined storage in Lake Pillsbury (owned and operated by the PG&E) and Lake Mendocino on May 31 is unusually low. *Dry Spring 1* conditions exist if the combined storage in Lake Pillsbury and Lake Mendocino is less than 150,000 acre-feet on May 31. Under *Dry Spring 1* conditions, the required minimum flow in the Upper Russian River between the confluence of the East Fork and West Fork and Healdsburg is 150 cfs from June through March, with a reduction to 75 cfs during October through December if Lake Mendocino storage is less than 30,000 acre-feet during those months. *Dry Spring 2* conditions exist if the combined storage in Lake Pillsbury and Lake Mendocino is less than 130,000 acre-feet on May 31. Under *Dry Spring 2* conditions, the required minimum flows in the Upper Russian River are 75 cfs from June through December and 150 cfs from January through March.

From Dry Creek to the Pacific Ocean, the required minimum flows in the Lower Russian River are 125 cfs during *Normal* water supply conditions, 85 cfs during *Dry* conditions and 35 cfs during *Critical* conditions.

In Dry Creek below Warm Springs Dam, the required minimum flows are 75 cfs from January through April, 80 cfs from May through October and 105 cfs in November and December during *Normal* water supply conditions. During *Dry* and *Critical* conditions, these required minimum flows are 25 cfs from April through October and 75 cfs from November through March.

Figure 1 shows all of the required minimum instream flows specified in Decision 1610 by river reach, the gauging stations used to monitor compliance, and the definitions of the various water supply conditions.

1.2 WATER SUPPLY CONDITIONS

There are three main water supply conditions that are defined in Decision 1610, which set the minimum instream flow requirements based on the hydrologic conditions for the Russian River system. These water supply conditions are determined based on criteria for the calculated cumulative inflow into Lake Pillsbury from October 1 to the first day of each month from January to June. Decision 1610 defines cumulative inflow for Lake Pillsbury as the algebraic sum of releases from Lake Pillsbury, change in storage and lake evaporation.

Dry water supply conditions exist when cumulative inflow to Lake Pillsbury from October 1 to the date specified below is less than:

- 8,000 acre-feet as of January 1;
- 39,200 acre-feet as of February 1;
- 65,700 acre-feet as of March 1;
- 114,500 acre-feet as of April 1;
- 145,600 acre-feet as of May 1; and
- 160,000 acre-feet as of June 1.

Critical water supply conditions exist when cumulative inflow to Lake Pillsbury from October 1 to the date specified below is less than:

- 4,000 acre-feet as of January 1:
- 20,000 acre-feet as of February 1;
- 45,000 acre-feet as of March 1;
- 50,000 acre-feet as of April 1;
- 70,000 acre-feet as of May 1; and
- 75,000 acre-feet as of June 1.

Normal water supply conditions exist whenever a *Dry* or *Critical* water supply condition is not present. As indicated above, Decision 1610 further specifies three variations of the *Normal* water supply condition based on the combined storage in Lake Pillsbury and Lake Mendocino on May 31. These three variations of the *Normal* water supply condition determine the required minimum instream flows for the Upper Russian River from the confluence of the East Fork and the West Fork to the Russian River's confluence with Dry Creek. This provision of Decision 1610 does not provide for any changes in the required minimum instream flows in Dry Creek or the Lower Russian River (the Russian River between its confluence with Dry Creek and the Pacific Ocean). A summary of the required minimum flows in the Russian River for *Normal*, *Normal — Dry Spring 1* and *Normal — Dry Spring 2* water supply conditions is provided here:

1. Normal: When the combined water in storage in Lake Pillsbury and Lake Mendocino on May 31 of any year exceeds 150,000 acre-feet or 90 percent of the estimated water supply storage capacity of the reservoirs, whichever is less:

From June 1 through August 31	185 cfs
From September 1 through March 31	150 cfs
From April 1 through May 31	185 cfs

2. Normal-Dry Spring 1: When the combined water in storage in Lake Pillsbury and Lake Mendocino on May 31 of any year is between 150,000 acre-feet or 90 percent of the estimated water supply storage capacity of the reservoirs, whichever is less, and 130,000 acre-feet or 80 percent or the estimated water supply storage capacity of the reservoirs, whichever is less:

From June 1 through March 31	150 cfs
From April 1 through May 31	185 cfs
If from October 1 through December 31, storage in Lake Mendocino is less than 30,000 acre-feet	75 cfs

3. Normal-Dry Spring 2: When the combined water in storage in Lake Pillsbury and Lake Mendocino on May 31 of any year is less than 130,000 acre-feet or 80 percent of the estimated water supply storage capacity of the reservoirs, whichever is less:

From June 1 through December 31	75 cfs
From January 1 through March 31	150 cfs
From April 1 through May 31	185 cfs

2.0 WATER SUPPLY CONDITIONS

On May 31, 2025, the cumulative inflow into Lake Pillsbury since October 1, 2024 (start of water year 2025) was 603,903 acre-feet and combined storage in Lake Pillsbury and Lake Mendocino was 151,600 acre-feet. Consequently, the water supply condition is categorized as *Normal* for the remainder of 2025 under the hydrologic index of Decision 1610. Sonoma Water is currently managing the Russian River under a *Normal* water supply condition with modified minimum instream flow requirements as authorized by the State Water Board's temporary urgency change order dated June 27, 2025, to comply with the requirements of the 2025 Russian River Biological Opinion. The order also authorized a change in the hydrologic index for the Russian River to the same Lake Mendocino storage thresholds as requested in these petitions (see Section 4.0). The reduction in the minimum instream flow requirements for the Upper and Lower Russian River under the order remains in effect until October 15, 2025. After October 15, 2025, the minimum instream flow requirements will revert to those specified in Decision 1610. Per the June 27, 2025 order, minimum instream flows on the Upper and Lower Russian River will continue to be based on the Lake Mendocino storage thresholds until the order expires on December 23, 2025. These current petitions request a continuation of that hydrologic index for another 180-day period starting December 24, 2025.

On the most recent evaluation date of the hydrologic index, October 1, 2025, Lake Mendocino storage was 67,975 acre-feet. This exceeded the threshold of 58,000 acre-feet and established a *Normal* water supply condition. Therefore, a *Normal* water supply condition will remain in effect until the next evaluation date of November 1, 2025.

Based on Sonoma Water's storage projections for Lake Mendocino, it is anticipated that the *Normal* water supply condition will most likely continue through the remainder of the calendar year.

2.1 POTTER VALLEY HYDROELECTRIC PROJECT

The PVP, owned and operated by PG&E, is located on the East Fork of the Russian River and the Eel River in Mendocino and Lake Counties. PVP's Lake Pillsbury is impounded by Scott Dam, which makes releases that can be diverted downstream along with Eel

River natural flows at Cape Horn Dam and passed through PG&E's hydroelectric generation facilities. Those facilities release diverted water to the East Fork.

As discussed in the introduction above, the PVP powerhouse is inoperable and will not be repaired. This has severely reduced the transfer of Eel River water, which now bypasses the power generation facilities and continues to meet FERC license terms and water supply agreement obligations. In addition, PG&E has revised operations at Lake Pillsbury to mitigate seismic risk, which led to a FERC-approved variance for this year and the filing of a long-term flow regime request under the Non-Capacity License Amendment application that, if approved, would result in further reductions in transfers of Eel River water into the East Fork.

2.2 LAKE MENDOCINO

As of October 2, 2025, the water supply storage level in Lake Mendocino was 67,626 acre-feet. This storage level is approximately 62.5 percent of the water supply storage curve for this time of year. Figure 2 shows observed storage in Lake Mendocino from 2016 through October 2, 2025. Current U.S. Army Corps of Engineers (USACE) flood control operations at Lake Mendocino are conducted under a planned major deviation to the Coyote Valley Dam/Lake Mendocino Flood Control Manual authorizing Forecast Informed Reservoir Operations (FIRO) procedures. These procedures include encroachment into a portion of the reservoir's flood control pool at the discretion of the USACE. From May 11th through October 1st, the FIRO major deviation storage curve is equivalent to the water supply storage curve of the Water Control Manual at a constant 111,000 acre-feet.

2.3 LAKE SONOMA

As of October 2, 2025, the water supply storage level in Lake Sonoma was 229,881 acre-feet. This storage level is approximately 93.6 percent of the minor deviation storage curve for this time of year. Figure 3 shows observed storage in Lake Sonoma from 2016 through October 2, 2025. Current flood control operations at Lake Sonoma are conducted under the protocols of a minor deviation to the reservoir's Water Control Manual that was approved by the USACE in December 2022. From March 1st through September 30th, the minor deviation storage curve is at 264,000 acre-feet, or 19,000 acre-feet above the water supply curve of the Water Control Manual.

3.0 CRITERIA FOR APPROVING TEMPORARY URGENCY CHANGE TO PERMITS 12947A, 12949, 12950, AND 16596

As required by Water Code section 1435, subdivision (b), the State Water Board must make the following findings before issuing a temporary change order:

1. The permittee or licensee has an urgent need to make the proposed change;
2. The proposed change may be made without injury to any other lawful user of water;
3. The proposed change may be made without unreasonable effect upon fish, wildlife, or other instream beneficial uses; and
4. The proposed change is in the public interest.

3.1 Urgency of the Proposed Change

For these petitions, an urgent need exists to implement the proposed changes due to the drastic reduction of potential Eel River water imports through PVP resulting from the inoperability of the powerhouse and revised operations at Lake Pillsbury. The volume of Eel River water that can be transferred to the Russian River is no longer correlated to cumulative inflow into Lake Pillsbury. An evaluation of the hydrologic condition in the Russian River is more appropriately established by conditions in its watershed. Without the proposed changes, the applicable minimum instream flow requirements may require releases of water from Lake Mendocino and Lake Sonoma at levels that would risk significant depletions of storage levels. Such depletions in storage could cause serious impacts to human health and welfare and reduce water supplies needed for fishery protection.

3.2 No Injury to Any Other Lawful User of Water

If these petitions are granted, Sonoma Water will still be required to maintain specified minimum instream flows in the Russian River. Because Sonoma Water will continue to make reservoir releases as necessary to satisfy minimum instream flow requirements and pass through natural and imported flows for downstream senior water rights, all legal users of water will still be able to divert and use the amounts of water that they are legally entitled to. Accordingly, granting these petitions will not result in any injury to any other lawful user of water.

3.3 No Unreasonable Effect upon Fish, Wildlife, or Other Instream Beneficial Uses

If these petitions are approved, monthly storage thresholds in Lake Mendocino would determine the water supply condition that sets the Russian River minimum instream flow requirements. This change could result in lower instream flows in the Russian River. Any

effects associated with such flow reductions would not be unreasonable, considering the potential catastrophic impacts to fish, wildlife and other instream beneficial uses that could occur under minimum instream flow requirements that the Russian River watershed and reservoirs cannot sustain.

3.4 THE PROPOSED CHANGE IS IN THE PUBLIC INTEREST

Approval of these petitions would provide alternative criteria for determining minimum instream flow requirements for the Russian River that would be based on a more accurate assessment of water supply conditions in the Russian River watershed. This would result in minimum instream flow requirements that more likely can be sustained with releases from Lake Mendocino and Lake Sonoma without severely depleting storage. It is in the public interest to manage these water supplies based on an index that is more reflective of the hydrologic conditions of the Russian River watershed.

4.0 REQUESTED TEMPORARY URGENCY CHANGE TO PERMITS 12947A, 12949, 12950, AND 16596

To address the changes in PVP operations and corresponding loss of Eel River water imports through the project, Sonoma Water is filing these petitions requesting that the State Water Board make the following temporary changes to the Decision 1610 requirements[3]:

Starting December 24, 2025, the minimum instream flow requirements for the Russian River would be established using an index based on water storage in Lake Mendocino, rather than the current index based on cumulative inflow into Lake Pillsbury. This temporary change will continue the implementation of the Lake Mendocino storage threshold as the operative hydrologic index for the Russian River. This request ensures that the water supply condition for the Russian River is determined by an index that is reflective of actual watershed conditions. Specifically, Sonoma Water proposes that the monthly storage values listed below be used, in lieu of cumulative Lake Pillsbury inflow, to determine the water supply conditions that establish which minimum instream flow requirements in Term 20 of Permit 12947A, Term 17 of Permits 12949 and 12950, and

[3] The analysis to develop a hydrologic index based on Lake Mendocino storage thresholds resulted in an evaluation period from October 1st through June 1st. While the requested period of these temporary urgency change petitions does not span the full period of these evaluation dates, the developed hydrologic index in full is requested as such to present the proposed hydrologic index in its totality.

Term 13 of Permit 16596 will apply to the Russian River:

a. *Dry* water supply conditions will exist when storage in Lake Mendocino is less than:

58,000 acre-feet as of October 1
51,000 acre-feet as of November 1
49,000 acre-feet as of December 1
68,400 acre-feet as of January 1
68,400 acre-feet as of February 1
68,400 acre-feet as of March 1
77,000 acre-feet as of March 16
86,000 acre-feet as of April 1
91,000 acre-feet as of April 16
93,000 acre-feet as of May 1
94,000 acre-feet as of May 16
94,000 acre-feet as of June 1

b. *Critical* water supply conditions exist when storage in Lake Mendocino is less than:

46,000 acre-feet as of October 1
41,000 acre-feet as of November 1
40,000 acre-feet as of December 1
42,000 acre-feet as of January 1
49,000 acre-feet as of February 1
57,000 acre-feet as of March 1
67,000 acre-feet as of March 16
73,000 acre-feet as of April 1
74,000 acre-feet as of April 16
75,000 acre-feet as of May 1
76,000 acre-feet as of May 16
76,000 acre-feet as of June 1

c. *Normal* water supply conditions exist in the absence of defined *Dry* or *Critical* water supply conditions.

Because the proposed criteria for determining the applicable minimum instream flow requirements will be tied to Lake Mendocino storage, it will more accurately reflect the hydrologic conditions in the Russian River, adjusting monthly from October through February and then biweekly from March 1 through June 1. This framework allows more responsive changes to the minimum flows in the late winter and spring as yields and hydrologic conditions develop. The proposed index establishes new criteria for determining the water supply conditions of Decision 1610 and does not modify the associated minimum instream flow requirements. This will shift the criteria for establishing hydrologic conditions in the Russian River watershed to local conditions rather than rely on cumulative inflows to Lake Pillsbury in the Eel River watershed, which are no longer representative of Russian River hydrologic conditions.

These storage thresholds in Lake Mendocino were developed by Sonoma Water engineering staff using its Russian River ResSim Model. The modeling scenarios assume: (1) current Russian River system losses; (2) WY 1911 to WY 2017 unimpaired flow hydrology, and (3) Potter Valley Project operations (consistent with those outlined in the October 2023, June 2024, and August 2025 FERC orders approving PG&E's flow variance requests). The thresholds were developed based on an analysis of maintaining carryover storage in Lake Mendocino over a simulated historical hydrologic dataset followed by a 1 in 100-year synthetic drought. A detailed description of the hydrologic analysis is presented in the technical memorandum included as Attachment A.

5.0 PROPOSED ACTIONS BY SONOMA WATER

To inform State Water Board staff and interested stakeholders in the Russian River watershed regarding reservoir and watershed conditions, Sonoma Water will prepare a weekly hydrologic status report that contains the following information:

- Current reservoir levels and reservoir storage hydrographs for Lake Mendocino and Lake Sonoma;
- The daily rate of change in storage, inflow and reservoir release for Lake Mendocino and Lake Sonoma; and
- Cumulative rainfall plot for current water year versus historical precipitation range for Ukiah. Cumulative rainfall forecasts for 3-day, 7-day and 16-day.

These reports will be made available on Sonoma Water's website during the term of the order approving Sonoma Water's requested temporary changes.

6.0 WATER CONSERVATION ACTIVITIES

The following water conservation activities reflect the efforts of Sonoma Water and the Sonoma-Marin Saving Water Partnership (Partnership). The Partnership represents 13 North Bay water utilities in Sonoma and Marin counties that have joined together to provide regional solutions for water use efficiency. The utilities (Partners) are: the Cities of Santa Rosa, Rohnert Park, Petaluma, Sonoma, Cloverdale, Cotati, Healdsburg; North Marin, Valley of the Moon and Marin Municipal Water Districts; California American Water Company-Larkfield; the Town of Windsor and Sonoma Water. The Partnership was formed to identify and recommend water use efficiency projects and to maximize the cost-effectiveness of water use efficiency programs in our region.

Sonoma Water and the retail agencies of the Partnership continue to implement their primary programs, water waste prohibitions, and outreach campaigns to achieve long-term water savings and the adoption of efficient water use habits in alignment with the state's Urban Water Use Objectives for retail water agencies. The Partnership's January through July 2025 water production totals are 11 percent below 2020 totals for the same period.

On May 10, 2025, the Partnership hosted the 15th annual Eco-Friendly Garden Tour at 19 gardens throughout Sonoma and Marin counties. The tour showcases water-wise and sustainable landscape practices to provide inspiration for participants interested in learning about and implementing similar practices at their homes. The event drew over 3,600 registered participants, with a few of the garden sites reporting over 400 visitors each. This year's tour included the native plant garden at Bayer Farm in the Roseland neighborhood in Santa Rosa, where the Sonoma Ecology Center hosted docent led tours and talks in Spanish. Earned media prior to the event in The Santa Rosa Press Democrat newspaper featured a California native plant garden at a participating residence in Sebastopol, which contributed to the events' high turnout.

The Partnership's summer outreach campaign launched in June and will continue through September. This year's theme is creating climate ready landscapes that are better adapted to survive the climate change induced weather extremes of fire, floods, and drought. The campaign highlights different topics each month, such as choosing water smart plants, irrigating efficiently, good garden design and maintenance, and use of rainwater and greywater. Weekly social media ads are placed over the 16-week campaign in addition to online and print ad placements. The use of video reels in place of social media still ads were included to boost the reach and engagement of the campaign. The reach on the Partnership's social sites alone for June – August was 108,945 views, with 1,176 link clicks to the Partnership's climate-ready resource page, and 2,469 YouTube

views of video posts. These reach numbers are further amplified through posts made on the participating partner agencies' social sites.

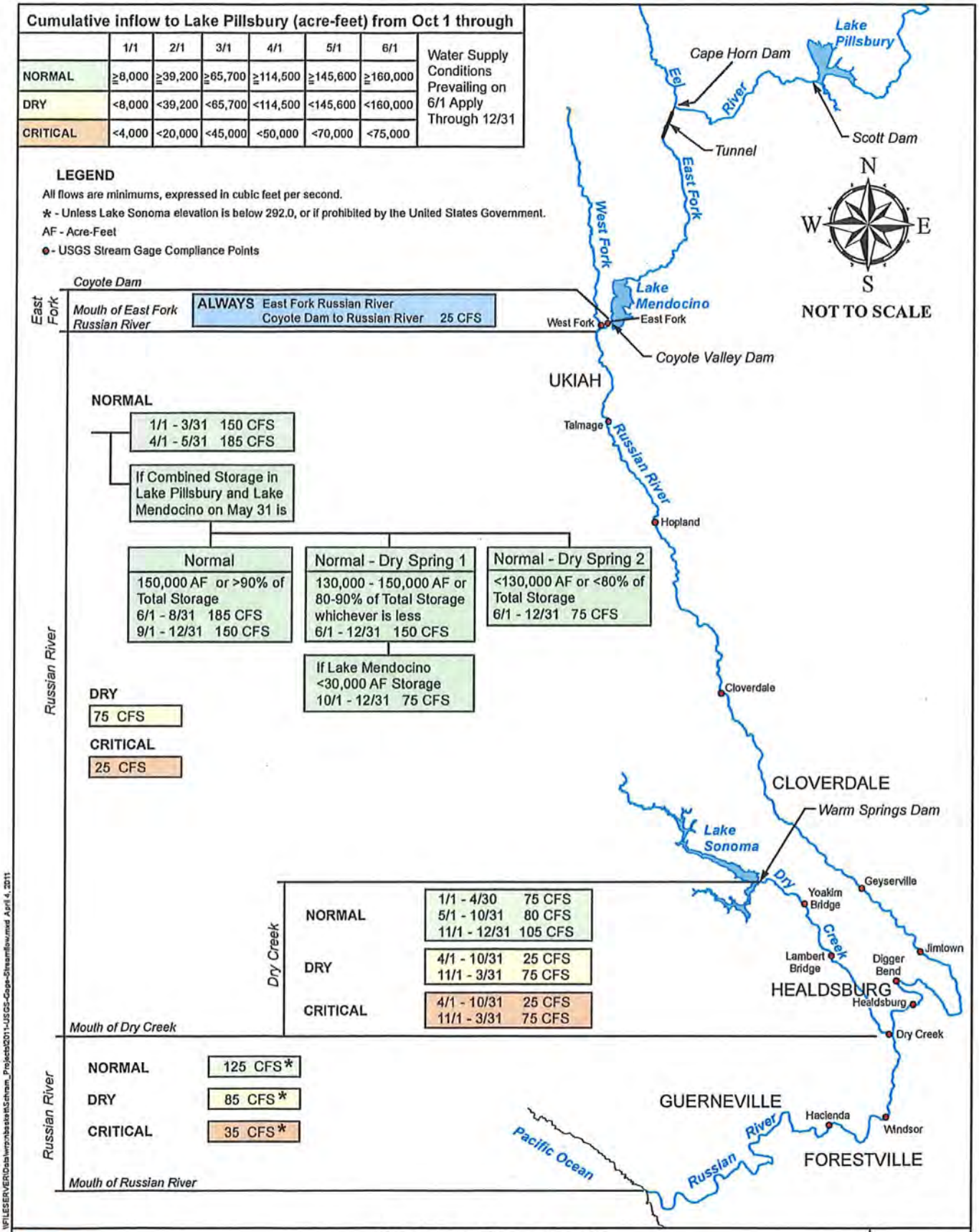
The Partnership collaborated with the UC Master Gardener Program of Sonoma County to sponsor a raingarden exhibit in the Hall of Flowers Courtyard Annex at the Sonoma County Fair, August 1-10. The exhibit was staffed during a four-hour window each day, providing fairgoers with in-person answers to questions and resources and instruction on implementing a raingarden at home. Over 700 interactions with fairgoers were recorded during staffed hours, with print resources made available during non-staff times.

The Partnership sponsored the Zero Waste Symposium on May 1 to feature an updated DIY Toolkit that now includes irrigation leak repair parts. The Partnership also tabled the City of Santa Rosa WaterSmart Expo on June 25, and the annual Fiesta de Independencia held at the Luther Burbank Center for the Arts on September 14.

Lastly, the Partnership is a fiscal sponsor and is contributing subject matter expertise to the California Water Efficiency Partnership's project to create a statewide multi-sector outreach and education toolkit for the new statewide ban on the use of potable water for irrigating nonfunctional turf (Assembly Bill 1572) in the commercial, industrial, and institutional customer sectors. These tools and resources will help provide education on best practices for transitioning turf landscapes to lower water use plantings, implementing needed irrigation system changes, and maintaining tree health where turf and trees are co-planted. The goals are to educate stakeholders, facilitate local adoption of updated ordinances, support consistent implementation across regions, and encourage community engagement through clear messaging and accessible resources. A dedicated website for these resources and information is in development, with an anticipated launch in October at https://nonfunctionalturfca.org/.

Additional program information, tools, and resources are available on the Partnership's website at https://www.savingwaterpartnership.org/.

FIGURES



Sonoma Water

Russian River Basin
Streamflow Requirements

Per State Water Resources Control Board Decision 1610, April 1986

Figure 1

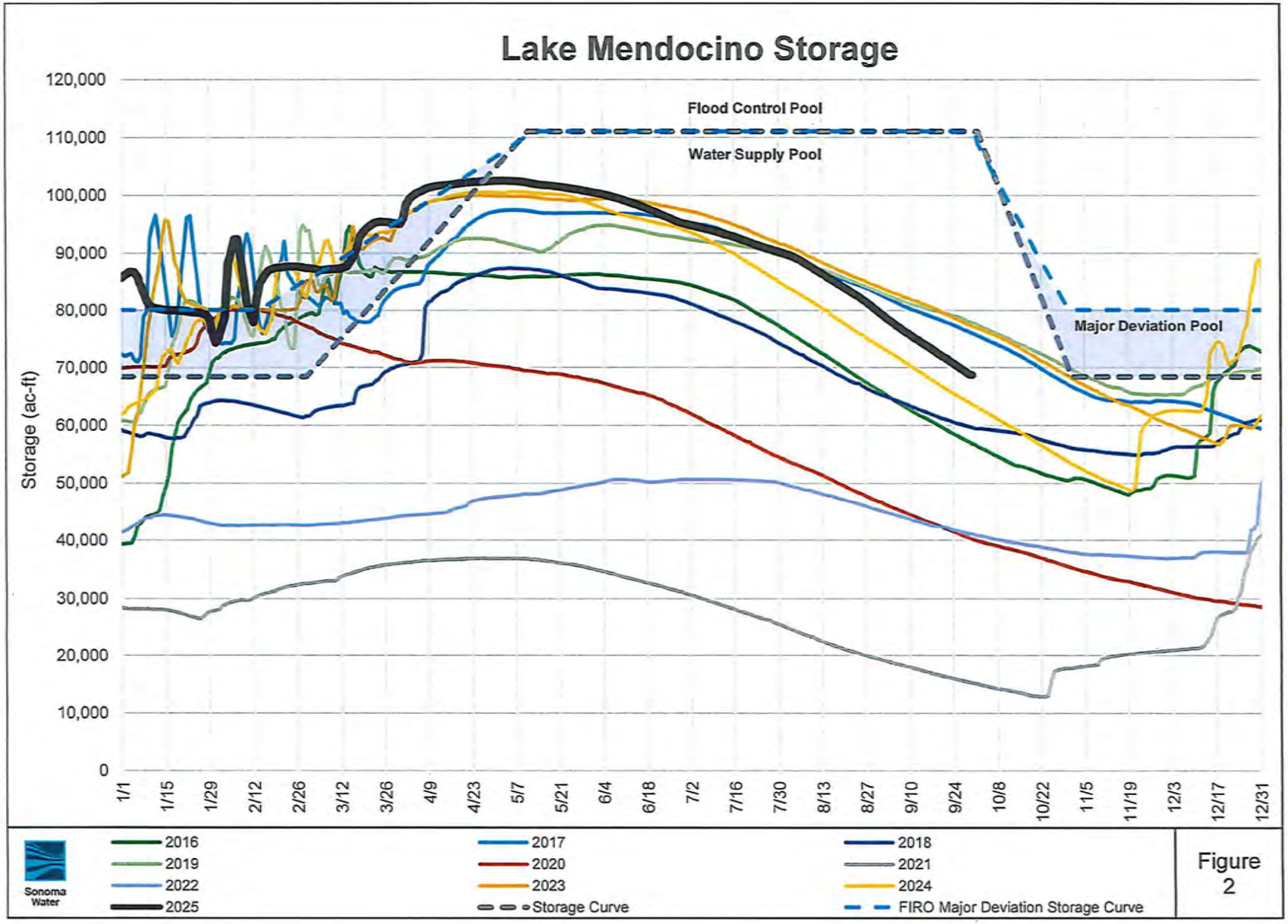

Lake Mendocino Storage
Flood Control Pool
Water Supply Pool
Major Deviation Pool
Storage (ac-ft)
120,000
110,000
100,000
90,000
80,000
70,000
60,000
50,000
40,000
30,000
20,000
10,000
0
1/1
1/15
1/29
2/12
2/26
3/12
3/26
4/9
4/23
5/7
5/21
6/4
6/18
7/2
7/16
7/30
8/13
8/27
9/10
9/24
10/8
10/22
11/5
11/19
12/3
12/17
12/31
2016
2017
2018
2019
2020
2021
2022
2023
2024
2025
Storage Curve
FIRO Major Deviation Storage Curve
Sonoma Water

Figure 2

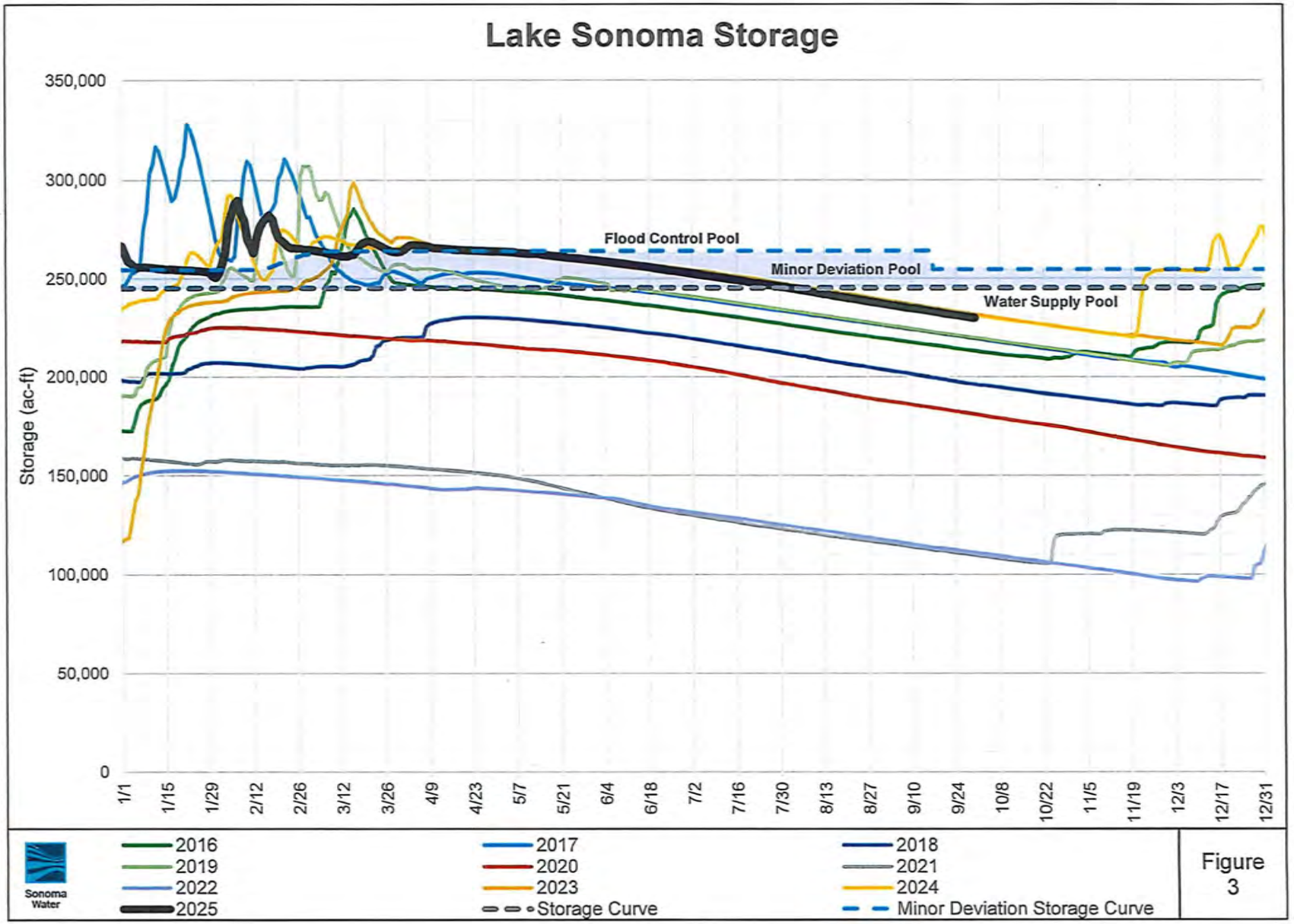

Lake Sonoma Storage
350,000
300,000
250,000
200,000
150,000
100,000
50,000
0
Storage (ac-ft)
Flood Control Pool
Minor Deviation Pool
Water Supply Pool
1/1
1/15
1/29
2/12
2/26
3/12
3/26
4/9
4/23
5/7
5/21
6/4
6/18
7/2
7/16
7/30
8/13
8/27
9/10
9/24
10/8
10/22
11/5
11/19
12/3
12/17
12/31
2016
2017
2018
2019
2020
2021
2022
2023
2024
2025
Storage Curve
Minor Deviation Storage Curve
Sonoma Water

Figure 3

SONOMA COUNTY WATER AGENCY

TECHNICAL MEMORANDUM

DATE: OCTOBER 3, 2025

SUBJECT: WATER RIGHTS LAKE MENDOCINO STORAGE HYDROLOGIC INDEX EVALUATION

Purpose

This technical memorandum provides the basis for the proposed Russian River hydrologic index in Sonoma Water's Temporary Urgency Change Petitions filing in October 2025 to replace the hydrologic index in Sonoma Water's water rights for water supply. The current hydrologic index was incorporated into Sonoma Water's water rights with the issuance of State Water Resources Control Board Decision 1610 (D-1610). The proposed hydrologic index will set the minimum instream flow requirements for the Upper Russian River, Dry Creek, and Lower Russian based on Lake Mendocino storage levels.

Methodology

Sonoma Water engineering staff utilized its Russian River reservoir/river operations model referred to as the Russian River System Model (RR ResSim) to develop and test the proposed hydrologic index. RR ResSim simulates reservoir operations with a daily time step over a range of hydrologic conditions. The proposed hydrologic index was designed to closely capture hydrologic conditions in the Russian River watershed and increase water supply reliability compared to the D-1610 hydrologic index that primarily relies on cumulative inflow into Lake Pillsbury in the Eel River watershed. The proposed hydrologic index evaluates Lake Mendocino storage against a storage threshold schedule to determine the water supply condition in the Russian River. The storage thresholds were designed based on a water supply analysis of Lake Mendocino storage by modeling a simulated historical hydrologic dataset and a 1 in 100-year synthetic drought hydrologic dataset using the RR ResSim model.

Potter Valley Project Imports to Russian River

Projected Potter Valley Project (PVP) imports (or diversions) by Pacific Gas & Electric (PG&E) are simulated using the Potter Valley System Model (PVP ResSim). The PVP ResSim model was developed

by the Water Supply Working Group as part of Congressman Jared Huffman's PVP Ad Hoc Committee. It was used for a PVP/Russian River operations alternatives analysis that met the Ad Hoc's objective of developing a 'Two-Basin Solution'. The simulated PVP diversions capture current operations based on changes to PVP that are described below.

Since October 2021, PVP normal operations have been interrupted by the failure of the transformer bank at the PVP powerhouse. PG&E has indicated that it does not intend to repair/replace the transformer bank based on costs to its rate payers and that they are in the process of surrendering the project's Federal Energy Regulatory Commission (FERC) license. Under these conditions, PG&E is no longer making discretionary transfers through the project for power generation, thereby limiting imports strictly to their license obligations for: 1) minimum release requirements into the East Fork Russian River, and 2) water supply contract deliveries to the Potter Valley Irrigation District.

Furthermore, in March 2023, PG&E informed FERC that they will no longer be closing the spillway gates on Scott Dam in the spring due to seismic concerns with the dam. This reduced the total storage capacity of Lake Pillsbury from approximately 77,000 acre-feet (ac-ft) to approximately 56,000 ac-ft. The reduction in storage capacity going into the summer season has necessitated PG&E to request flow variances to reduce releases from Scott Dam in order to manage the reservoir's cold-water pool. Cold water releases support suitable habitat for steelhead and salmon species listed under the Endangered Species Act that rear in the Eel River downstream of Scott Dam in the late summer and early fall.

With the development of the proposed hydrologic index completed in 2023, the supporting hydrologic analysis assumed PG&E would operate the PVP consistent with the operations described in the *Order Approving Temporary Variance of Flow Requirements Under License Article 52* (October 2, 2023) from the FERC. PG&E requested the flow variances on May 23, 2023 (approved on October 2, 2023), February 21, 2024 (approved on June 26, 2024), and February 14, 2025 (approved on August 4, 2025). PG&E also requested an amendment to the FERC license on January 30, 2025, that would result in PVP operations that are slightly different than described in the flow variance request. The October 2023 order's impact to the Russian River watershed was a decrease in the minimum flow release requirements to the East Fork of the Russian River from 75 cfs to 25 cfs immediately and authorizing a decrease to 5 cfs under specific conditions. In the July 2024 and August 2025 orders,

essentially the same changes to minimum releases were approved with only a slight variation in the specific conditions under which flows could be further decreased to 5 cfs. Departing from these requests, the license amendment request from January 2025 seeks to decrease the minimum instream flow release requirements to the East Fork of the Russian River to 5 cfs after April 15th, as soon as uncontrolled releases from Scott Dam cease, as opposed to the 25 cfs in the previous orders and requests. The modified operating conditions under these orders attempt to preserve Lake Pillsbury's cold-water pool. The orders state that the variance remains in effect until Lake Pillsbury reaches 36,000 ac-ft after October 1st.

The impact of these changes is a reduction in PVP diversions from a maximum of 130 cfs in the summer to 75 cfs with the likelihood of further decreases to 55 cfs based on recent years' operations. For this analysis, the limitation of a potential maximum diversion of 75 cfs was assumed to begin on May 16th and run through June 30th with 55 cfs thereafter. This assumption is consistent with 2023, 2024, and 2025 orders, but slightly different than the 2025 license amendment request as described above. The maximum PVP diversion is calculated as the minimum release flow requirement on the East Fork of the Russian River plus the maximum contract request of 50 cfs from Potter Valley Irrigation District. These changes represent an approximate reduction of 19,000 ac-ft in PVP diversions over the summer months. Depending on the hydrologic conditions, this reduction in diversions may continue into a dry fall and winter if Lake Pillsbury storage does not recover to 36,000 ac-ft after October 1st.

Hydrologic Index Design

The proposed hydrologic index was designed to meet three objectives: 1) capture hydrologic conditions in the Russian River watershed, 2) maintain threshold evaluation dates similar to D-1610 hydrologic index evaluation dates, and 3) ensure Lake Mendocino storage will reliably not be depleted during a 1 in 100-year design drought.

The proposed hydrologic index will evaluate Lake Mendocino storage against storage thresholds to determine the water supply condition that sets the minimum instream flow requirements for the Russian River. Lake Mendocino storage was determined to be a suitable index for the Russian River due to its location as the upstream point in the watershed as well as its relatively low storage capacity, which results in its water supply reliability being very sensitive to changes in the watershed and PVP imports from the Eel River.

Storage threshold evaluation dates were selected to be similar to the D-1610 hydrologic index evaluation dates, which are the first of the month from January through June. The proposed index will evaluate storage thresholds on the first of the month from January through February, then the first and middle of the month from March through May, and then the first of the month for June and October through December. The additional evaluation days during March through May allow the hydrologic index to be more responsive to developing dry conditions in the spring that may result in excessive loss of storage in Lake Mendocino under drier than average conditions. The October through December evaluation dates serve the same purpose as D-1610 as they capture abnormally dry winters. However, the proposed hydrologic index can adjust the water supply condition for the Upper River, Dry Creek, and Lower River to any drier or wetter schedule, while D-1610 can only adjust the Upper River water supply condition from a *Normal* to *Dry* condition during the October through December evaluation period.

The primary purpose in developing the proposed hydrologic index was to ensure Lake Mendocino water supply reliability. The storage threshold values were developed to achieve a minimum carryover storage on October 1st that would be sufficient to prevent storage from being depleted in the event of a subsequent 1 in 100-year design drought. This involved two steps: (1) determine the minimum carry over needed for a subsequent synthetic 1 in 100-year drought, (2) simulate the 107 years of hydrologic data through the RR ResSim model to determine how many years meet the minimum carry over storage criteria.

The minimum Lake Mendocino carryover storage needed for a subsequent 1 in 100-year drought was determined using three different scenarios simulated in RR ResSim. Each simulation runs from October 1st through December 31st of the following water year for a total of 15 months, with the synthetic drought used as the input hydrology. Each scenario corresponded to a different initial water supply condition (Normal, Dry, and Critical) that stayed constant until January 1st when all scenarios switched to a *Critical* water supply condition. The PVP imports were set to the appropriate water supply condition based on the scenario. Initial storage for Lake Mendocino was set high enough for each scenario so that the reservoir would not be depleted during the simulation. All simulated storage values were then adjusted lower so that the lowest storage was equal to the depleted reservoir storage value of approximately 2,100 ac-feet (Figure 1). The result is a time series of minimum storage values required to survive the 1 in 100-year synthetic drought starting on October 1st for each scenario (Figure 2). For example, to maintain a *Normal* water supply condition from

October 1st through December 31st and not deplete the reservoir in a following 1 in 100-year drought, Lake Mendocino will require a minimum storage of approximately 58,000 ac-ft on October 1st. The absolute minimum required storage values to not deplete the reservoir correspond to the values shown for the *Critical* water supply condition in Figure 6, with approximately 36,000 ac-ft required on October 1st.

Figure 1: Lake Mendocino 1 in 100 Year Drought Analysis

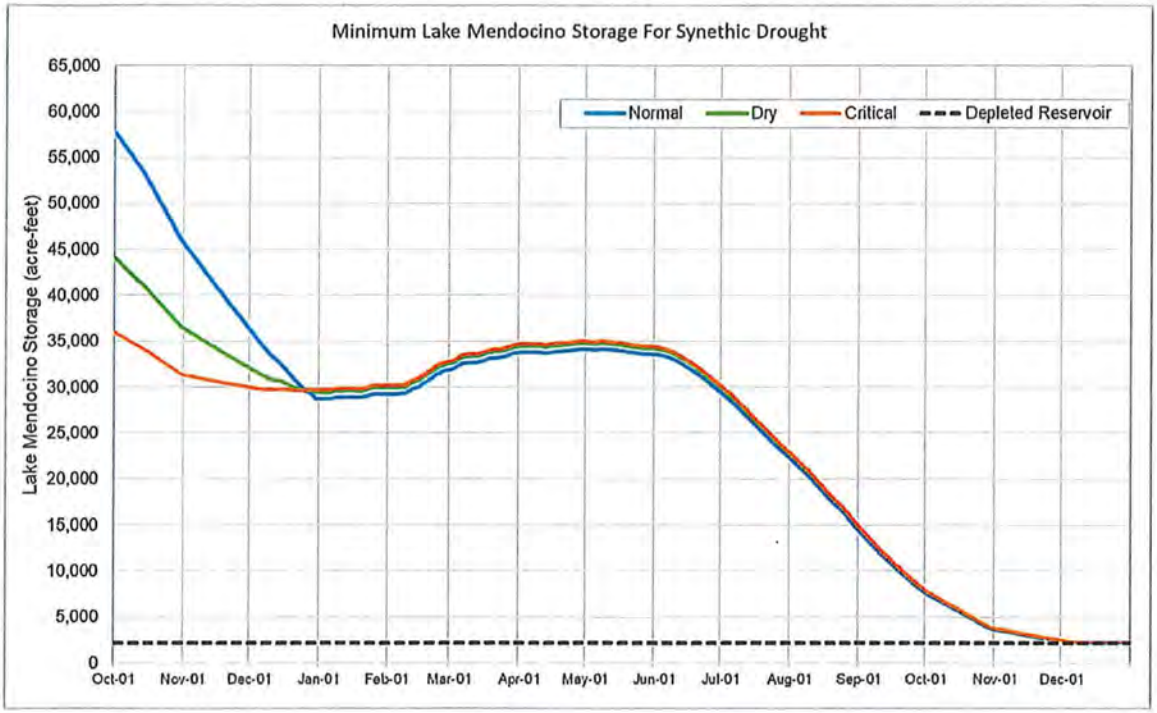


Figure 2: Minimum Required Lake Mendocino Storage for 1 in 100-year Drought

Minimum Required Lake Mendocino Storage (ac-ft)			
	Initial Water Supply Condition		
	Normal	Dry	Critical
October 1st	57,644	44,021	35,956
November 1st	45,469	36,305	31,311
December 1st	36,139	32,024	30,001

January 1st	28,743	29,452	29,718

Storage thresholds for the proposed hydrologic index were developed using RR ResSim by simulating Lake Mendocino storage for the 107-year hydrologic record. The storage threshold values were iterated to achieve Lake Mendocino October 1st carry over storages that are greater than the minimum required calculated in the 1 in 100-year drought analysis, while maintaining even distribution of water supply condition occurrences over the calendar year. The iterations resulted in storage thresholds where simulated Lake Mendocino storage on October 1st exceeded the minimum required in all but two years (Figure 3). The two years that did not meet the minimum required October 1st storage are 1924 and 1977. Water year 1977 was significantly drier than 1 in 100-year synthetic drought and was determined to be too conservative therefore not meeting the minimum storage requirement. Water year 1924 was abnormally dry in the Lake Pillsbury watershed, which resulted in a depleted reservoir in the early fall and the PVP diversions dropping to 0 cfs.

Figure 3: Exceedance Plot of Simulated October 1st Lake Mendocino Storage

Coordination with Regional Water Quality Control Board

For change petitions only, you must request consultation with the Regional Water Quality Control Board regarding the potential effects of your proposed change on water quality and other instream beneficial uses. (Cal. Code Regs., tit. 23, § 794.) In order to determine the appropriate office for consultation, see: http://www.waterboards.ca.gov/waterboards_map.shtml. Provide the date you submitted your request for consultation here, then provide the following information.

Date of Request: 10/1/2025

Will your project, during construction or operation, (1) generate waste or wastewater containing such things as sewage, industrial chemicals, metals, or agricultural chemicals, or (2) cause erosion, turbidity or sedimentation? ○ Yes ◉ No

Will a waste discharge permit be required for the project? ○ Yes ◉ No

If necessary, provide additional information below:

On October 1, 2025 Jessica Martini-Lamb of Sonoma Water sent an email to Bryan McFadin of the North Coast Regional Water Quality Control Board (NCRWQCB) to notify the pending filing of these temporary urgency change petitions. NCRWQCB staff including Bryan McFadin participated in a biweekly meeting on 9/5/2025 where Sonoma Water staff discussed water quality monitoring and the temporary urgency change petitions filing.

Insert the attachment number here, if applicable:

Local Permits

For temporary transfers only, you must contact the board of supervisors for the county(ies) both for where you currently store or use water and where you propose to transfer the water. (Wat. Code § 1726.) Provide the date you submitted your request for consultation here.

Date of Contact:

For change petitions only, you should contact your local planning or public works department and provide the information below.

Person Contacted: Date of Contact:

Department: Phone Number:

County Zoning Designation:

Are any county permits required for your project? If yes, indicate type below. ○ Yes ◉ No

☐ Grading Permit ☐ Use Permit ☐ Watercourse ☐ Obstruction Permit

☐ Change of Zoning ☐ General Plan Change ☐ Other (explain below)

If applicable, have you obtained any of the permits listed above? If yes, provide copies. ○ Yes ○ No

If necessary, provide additional information below:

Insert the attachment number here, if applicable:

Federal and State Permits

Check any additional agencies that may require permits or other approvals for your project:

☐ Regional Water Quality Control Board ☐ Department of Fish and Game

☐ Dept of Water Resources, Division of Safety of Dams ☐ California Coastal Commission

☐ State Reclamation Board ☐ U.S. Army Corps of Engineers ☐ U.S. Forest Service

☐ Bureau of Land Management ☐ Federal Energy Regulatory Commission

☐ Natural Resources Conservation Service

Have you obtained any of the permits listed above? If yes, provide copies. ○ Yes ◉ No

For each agency from which a permit is required, provide the following information:

Agency	Permit Type	Person(s) Contacted	Contact Date	Phone Number

If necessary, provide additional information below:

Insert the attachment number here, if applicable: ☐

Construction or Grading Activity

Does the project involve any construction or grading-related activity that has significantly altered or would significantly alter the bed, bank or riparian habitat of any stream or lake? ○ Yes ◉ No

If necessary, provide additional information below:

Insert the attachment number here, if applicable: ☐

Archeology

Has an archeological report been prepared for this project? If yes, provide a copy. ◯ Yes ◉ No

Will another public agency be preparing an archeological report? ◯ Yes ◉ No

Do you know of any archeological or historic sites in the area? If yes, explain below. ◯ Yes ◉ No

If necessary, provide additional information below:

Insert the attachment number here, if applicable: ☐

Photographs

For all petitions other than time extensions, attach complete sets of color photographs, clearly dated and labeled, showing the vegetation that exists at the following three locations:

☒ Along the stream channel immediately downstream from each point of diversion

☒ Along the stream channel immediately upstream from each point of diversion

☒ At the place where water subject to this water right will be used

Maps

For all petitions other than time extensions, attach maps labeled in accordance with the regulations showing all applicable features, both present and proposed, including but not limited to: point of diversion, point of rediversion, distribution of storage reservoirs, point of discharge of treated wastewater, place of use, and location of instream flow dedication reach. (Cal. Code Regs., tit. 23, §§ 715 et seq., 794.)

Pursuant to California Code of Regulations, title 23, section 794, petitions for change submitted without maps may not be accepted.

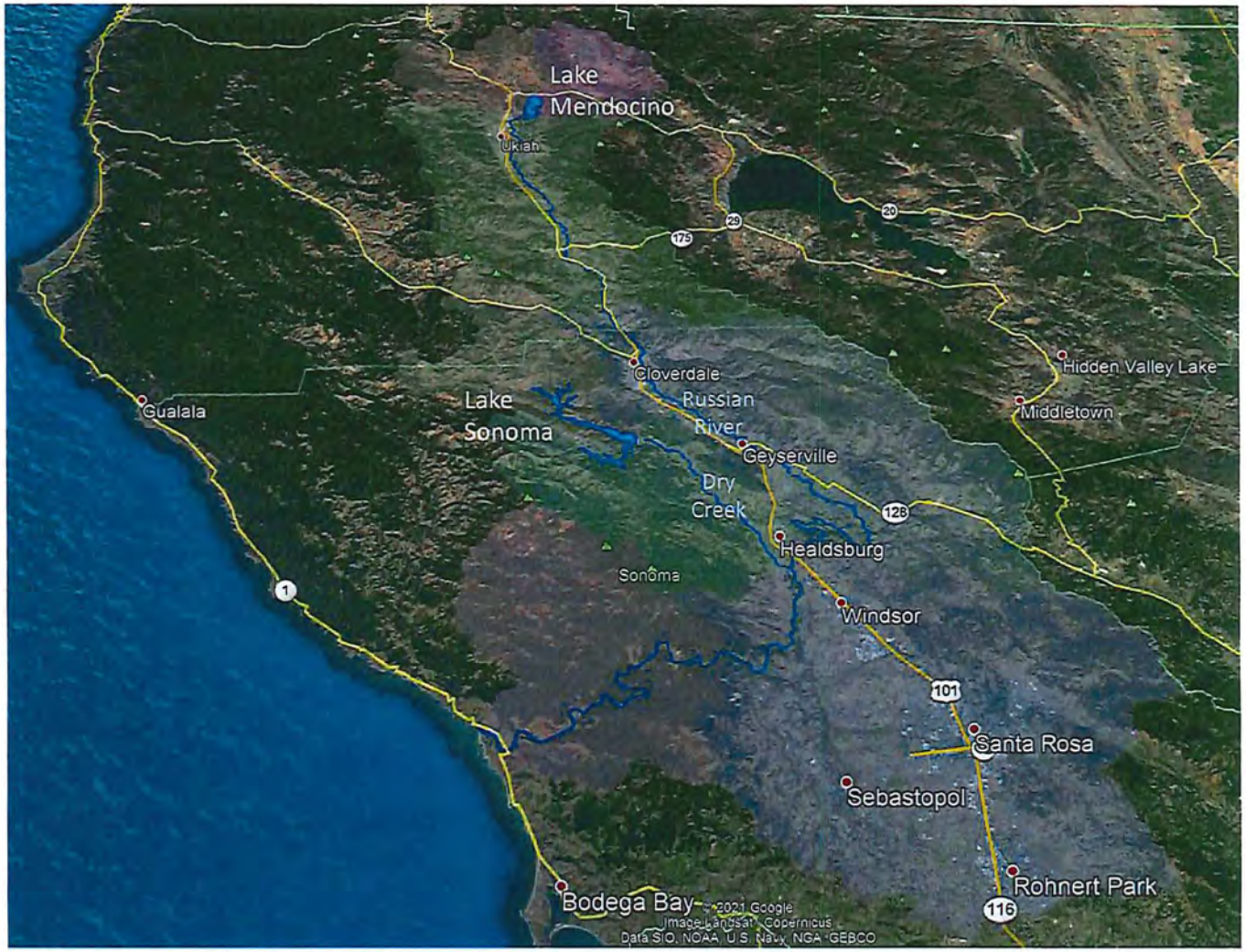
All Water Right Holders Must Sign This Form:
I (we) hereby certify that the statements I (we) have furnished above and in the attachments are complete to the best of my (our) ability and that the facts, statements, and information presented are true and correct to the best of my (our) knowledge. Dated 14/3/2025 at Santa Rosa, CA .

Water Right Holder or Authorized Agent Signature

Water Right Holder or Authorized Agent Signature

NOTE:
- **Petitions for Change may not be accepted unless you include proof that a copy of the petition was served on the Department of Fish and Game. (Cal. Code Regs., tit. 23, § 794.)**
- **Petitions for Temporary Transfer may not be accepted unless you include proof that a copy of the petition was served on the Department of Fish and Game and the board of supervisors for the county(ies) where you currently store or use water and the county(ies) where you propose to transfer the water. (Wat. Code § 1726.)**

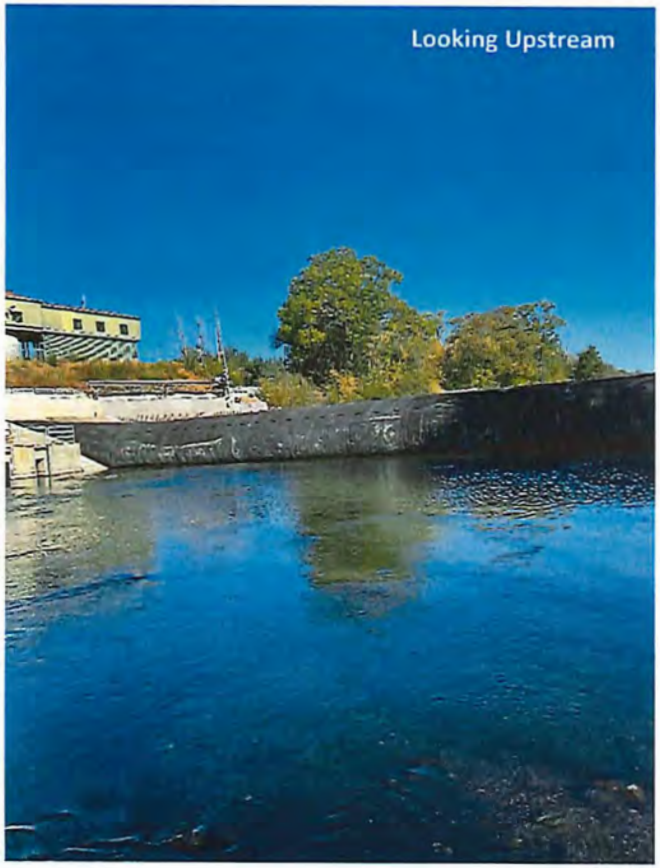
SONOMA WATER
Russian River Watershed Place of Water Use

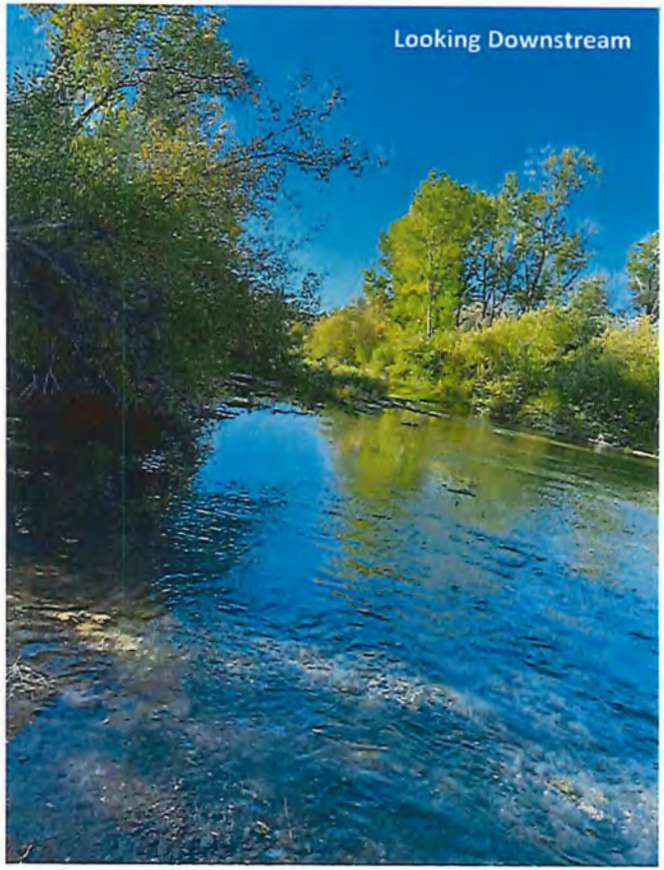


SONOMA WATER

Photographs of Russian River Downstream of River Diversion System at Mirabel Park on Oct 14, 2021

Mirabel Inflatable Dam





NOTICE OF EXEMPTION

TO: ☒ Office of Planning and Research
State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

☒ County Clerk
County of Sonoma
585 Fiscal Drive, Room 103
Santa Rosa, CA 95403

☒ County Clerk
County of Mendocino
501 Low Gap Road
Ukiah, CA 95482

FROM: Sonoma County Water Agency
404 Aviation Blvd.
Santa Rosa, CA 95403

Project Title: Petitions Requesting Approval of Temporary Urgency Changes in Water Right Permits 12947A, 12949, 12950, and 16596 in Mendocino and Sonoma Counties

Project Location- Specific: The proposed project will occur in Mendocino and Sonoma counties at Lake Mendocino, in the Upper Russian River from Coyote Valley Dam/Lake Mendocino to the confluence with Dry Creek, Dry Creek downstream of Warm Springs Dam/Lake Sonoma, and in the Lower Russian River from the confluence with Dry Creek to the Pacific Ocean. Figure 1 shows the minimum instream flow requirements for the Russian River system. Communities and cities along the Russian River include Ukiah, Hopland, Cloverdale, Geyserville, Healdsburg, Forestville, Mirabel Park, Rio Nido, Guerneville, Monte Rio, Duncans Mills, and Jenner.

Project Location – City: N/A

Project Location – County: Mendocino and Sonoma

Description of Nature, Purpose and Beneficiaries of Project: The Sonoma County Water Agency (Sonoma Water) controls and coordinates water supply releases from the Coyote Valley Dam and Warm Springs Dam projects in accordance with the provisions of water rights Decision 1610, which the State Water Resources Control Board (State Water Board) adopted on April 17, 1986. Decision 1610 specifies the water supply conditions for the Russian River and the minimum instream flow requirements for the Upper Russian River, Dry Creek, and the Lower Russian River, which vary based on hydrological conditions and cumulative inflow into Lake Pillsbury as the hydrologic index (Figure 1).

Sonoma Water is filing temporary urgency change petitions (TUCPs) requesting that storage thresholds in Lake Mendocino be used as the hydrologic index to determine the water supply condition in the Russian River watershed. An urgent need exists to implement the proposed changes due to the drastic reduction of potential Eel River water imports through Pacific Gas and Electric's (PG&E) Potter Valley Hydroelectric Project (PVP). Without the proposed changes, the applicable minimum instream flow requirements may require releases of water from Lake Mendocino and Lake Sonoma at levels that would risk significant depletions of storage levels. Such depletions could cause serious impacts to human health and welfare and reduce water supplies needed for protection of listed salmon species in the Russian River. These changes are necessary to ensure that the water supply condition and corresponding minimum instream flow requirements in the Russian River watershed are aligned with actual watershed hydrologic conditions. This is essential to maintain sustainable reservoir/river operations to protect municipal water supply and listed salmon species in the Russian River.

In Sonoma Water's water right permits' terms established under State Water Board's Decision 1610, the water supply condition for the Russian River is determined using cumulative inflow into Lake Pillsbury as the hydrologic index. Lake Pillsbury is a storage reservoir located in the Eel River watershed for PG&E's PVP, which transfers water into the East Fork of the Russian River (East Fork).

Since 2021, a transformer bank failure at the PVP powerhouse has resulted in significant reductions in Eel River transfers into the Russian River. This failure caused PVP hydropower generation to cease and with it all associated discretionary transfers of Eel River water to the East Fork. With the plans to surrender the license and decommission the project, PG&E announced in March 2023 that the transformer would not be replaced, permanently ending hydropower operations.

With hydropower operations no longer occurring at the project, PG&E has stated that discretionary transfers beyond its FERC license and contract obligations will not be made. As a result of the project no longer generating hydropower, discretionary transfers of Eel River water to the East Fork have been reduced by up to 456 acre-feet per day[1].

Additionally, on July 31, 2023, PG&E submitted a long-term flow regime request to modify flow requirements under current Federal Energy Regulatory Commission (FERC) license. To reduce the potential seismic risk at Lake Pillsbury's Scott Dam, PG&E made the decision to keep the spillway gates open atop Scott Dam indefinitely, reducing the water storage capacity in Lake Pillsbury by approximately 20,000 acre-feet. Consequently, PG&E claims that Lake Pillsbury can no longer sustain normal operations under the current license terms. PG&E proposed a reduction in the minimum release flow requirements for the East Fork flows starting in 2024 until project decommissioning is complete. The long-term flow regime request is still under review by FERC. On January 30, 2025, as part of this process, PG&E submitted a Non-Capacity License Amendment application as requested by FERC.

While the license amendment request is under FERC review, PG&E will continue with annual requests for a temporary variance of flow requirements due to the seismic risk at Scott Dam and its decision to no longer close the spillway gates. On August 4, 2025, FERC issued an order approving PG&E's February 14, 2025 variance request. FERC approved changes to the minimum release flows in the Eel River and the East Fork that included: (1) a reduction in minimum release flow requirements for the Eel River below Scott Dam to the critical water year classification requirement of 20 cfs; (2) a reduction in minimum release flow requirements for the East Fork immediately from 75 cfs to 25 cfs and an authorized reduction to 5 cfs if water temperatures of Lake Pillsbury releases exceeded 15 degrees Celsius; (3) the minimum release flow requirement for the East Fork to increase on September 30th to 25 cfs and remain there while the FERC order is in effect. Post September 30th, reductions to the East Fork may be implemented if PG&E forecasts storage in Lake Pillsbury to drop below 12,000 acre-feet. The order will terminate upon storage in Lake Pillsbury exceeding 36,000 acre-feet after October 1.

Without the proposed changes to Sonoma Water's water rights permits, actual water supply conditions in the Russian River may be misaligned with the designated water supply condition based on the Lake Pillsbury cumulative inflow hydrologic index. As described above, multiple changes to the PVP operations have reduced and could further reduce the transfers of Eel River water into the Russian River. The historical link between the two watersheds on which Decision 1610 is based is no longer applicable. The hydrologic index of Decision 1610 is no longer a reliable metric for Russian River water supply conditions without the historical large inter-basin transfer and will not function as intended. While the Lake Pillsbury watershed on the Upper Eel River and the Upper Russian River are adjacent basins, the hydrologic conditions can be quite different. For example, in water year 2021, Lake Mendocino experienced the second driest year on record for the Ukiah Valley (period of record: 128 years), unequivocally a 'Critical' condition. However, based on the cumulative inflow to Lake Pillsbury, water supply conditions in the Russian River were classified as 'Normal' on January 1, 2021, and 'Dry' on February 1, which remained the designated water supply condition for the rest of the calendar year.

Over a month, the difference between water needed for a 'Normal' water supply condition and a 'Dry' condition to maintain instream flow requirements is almost 4,500 ac-ft under the winter minimum instream flow requirements of Decision 1610. Under spring and summer requirements, it amounts to over 6,500 ac-ft. Year-round, the additional amount of water needed between a 'Dry' water supply condition and a 'Critical' condition to maintain instream flow requirements is nearly 3,000 ac-ft over a month. During a period of drought, not properly assessing

[1] PVP has design flow capacities of up to 240 cubic feet per second (cfs) through the powerhouse for power generation and up to 135 cfs through the powerhouse bypass to meet FERC license requirements for minimum release flows into the East Fork of the Russian River and water supply contract requirements with the Potter Valley Irrigation District.

the water supply condition could lead to significantly more depletion of storage than intended under such conditions. Such was the case that occurred during the 2020-2022 drought when the D1610 hydrologic index if followed would have resulted in an additional 25,785 ac-ft of storage release prior to the reservoir reaching its seasonal low point of 12,864 ac-ft on October 23, 2021.

Under the current Decision 1610 hydrologic index, the applicable minimum instream flow requirements may require releases of water from Lake Mendocino and Lake Sonoma at unsustainable levels if the Russian River watershed experiences significantly less rainfall than the Lake Pillsbury watershed. Given the changes to PVP operations, the influence of the Eel River water imports on downstream hydrologic conditions in the Russian River is greatly diminished. Therefore, cumulative inflow into Lake Pillsbury is no longer an appropriate metric to assess the hydrologic conditions in the Russian River watershed. Continuing to use this metric to determine the hydrologic water supply condition and therefore minimum instream flow requirements in the Russian River watershed would risk substantial depletions of storage levels that could cause significant impacts to human health and welfare and reduce water supplies needed for fishery protection.

To address the changes in PVP operations and corresponding loss of Eel River water imports through the PVP, Sonoma Water is requesting the State Water Board approve TUCPs that use storage thresholds in Lake Mendocino as the hydrologic index to determine the water supply condition in the Russian River watershed.

Name of Public Agency Approving Project: State Water Resources Control Board – Division of Water Rights

Name of Person or Agency Carrying Out Project: Sonoma County Water Agency

Exempt Status (check one):

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☒ Emergency Project (Sec.21080 (b)(4); 15269(b)(c)): Section 21080(b)(4) and State CEQA Guidelines 15269(c); Specific actions necessary to prevent or mitigate an emergency
- ☒ Categorical Exemption. State type and section number: State CEQA Guidelines 15307: Actions by Regulatory Agencies for Protection of Natural Resources; State CEQA Guidelines 15308: Actions by Regulatory Agencies for Protection of the Environment
- ☐ Statutory Exemptions. State Code number:

Reasons why project is exempt: The project is statutorily exempt under California Environmental Quality Act (CEQA) Statute 21080(b)(4) and categorically exempt from CEQA under the State CEQA Guidelines Sections 15269(c), 15307 and 15308.

A. Actions to Prevent or Mitigate an Emergency
California Public Resources Code, Division 13, Section 21080(b)(4) provides that specific actions necessary to prevent or mitigate an emergency are exempt from CEQA. The emergency conditions are due to an urgent need to implement the proposed changes as a result of the drastic reduction of potential Eel River water imports through the PVP resulting from the inoperability of the powerhouse for the foreseeable future and PG&E's decision to keep the spillway gates open atop Scott Dam indefinitely. The consequences of revised operations at Lake Pillsbury led to PG&E's filing for a long-term flow regime request to modify flow requirements. The volume of Eel River water that can be transferred to the Russian River is no longer correlated to cumulative inflow into Lake Pillsbury. An evaluation of the hydrologic condition in the Russian River is more appropriately established by conditions in its watershed. Without the proposed changes, the applicable minimum instream flow requirements may require releases of water from Lake Mendocino and Lake Sonoma at levels that would risk significant depletions of storage levels. Such depletions in storage could cause serious impacts to human health and welfare and reduce water supplies needed for fishery protection. The required change is urgent and cannot be accomplished within the timeframe required for completion of the Environmental Impact Report (already in process) that evaluates broader proposed changes to Decision 1610.

B. Actions by Regulatory Agencies for Protection of Natural Resources and the Environment
CEQA Guidelines Sections 15307 and 15308 provide that actions taken by regulatory agencies to assure the maintenance, restoration or enhancement of a natural resource and the environment are categorically exempt. Sonoma Water is proposing temporary urgency changes to its water right Permits 12947A, 12949, 12950, and 16596 that the State Water Resources Control Board, as the regulatory agency, will consider and potentially approve. Those changes are necessary to ensure an accurate evaluation of water supply conditions that would maintain viable operations to support municipal use, protect listed salmon species, address water supply conditions at Lake Mendocino and Lake Sonoma, and best prevent Lake Mendocino from declining to a storage level at which the reservoir may no longer be functional. Approval of the TUCPs would provide alternative storage thresholds and criteria for determining minimum instream flow requirements for the Russian River that would be based on a more accurate assessment of water supply conditions in the Russian River watershed. This would result in minimum instream flow requirements that could more likely be sustained with releases from Lake Mendocino and Lake Sonoma without the risk of severely depleting storage and exacerbating a water shortage condition and harming natural resources and the environment.

Lead Agency Contact Person: Connie Barton **Area Code/Telephone/Extension:** 707-547-1905

Signature	General Manager *Title*	October 3, 2025 *Date*

☒ Signed by Lead Agency

☒ Signed by Applicant Date received for filing at OPR:_____

Cumulative inflow to Lake Pillsbury (acre-feet) from Oct 1 through							
	1/1	2/1	3/1	4/1	5/1	6/1	Water Supply Conditions Prevailing on 6/1 Apply Through 12/31
NORMAL	≥8,000	≥39,200	≥65,700	≥114,500	≥145,600	≥160,000	
DRY	<8,000	<39,200	<65,700	<114,500	<145,600	<160,000	
CRITICAL	<4,000	<20,000	<45,000	<50,000	<70,000	<75,000	

LEGEND

All flows are minimums, expressed in cubic feet per second.

* - Unless Lake Sonoma elevation is below 292.0, or if prohibited by the United States Government.

AF - Acre-Feet

● - USGS Stream Gage Compliance Points

Lake Pillsbury
Cape Horn Dam
Eel River
Tunnel
Scott Dam
East Fork
West Fork
Lake Mendocino
West Fork
East Fork
Coyote Valley Dam
N
W
E
S
NOT TO SCALE

Coyote Dam

East Fork

Mouth of East Fork Russian River

ALWAYS East Fork Russian River
Coyote Dam to Russian River 25 CFS

UKIAH

Talmage

Russian River

Hopland

Cloverdale

CLOVERDALE

Warm Springs Dam

Lake Sonoma

Dry Creek

Geyserville

Yoakim Bridge

Lambert Bridge

Digger Bend

Jimtown

HEALDSBURG

Healdsburg

Dry Creek

GUERNEVILLE

Hacienda

Windsor

Russian River

FORESTVILLE

Pacific Ocean

Russian River

Mouth of Russian River

NORMAL

1/1 - 3/31 150 CFS
4/1 - 5/31 185 CFS

If Combined Storage in Lake Pillsbury and Lake Mendocino on May 31 is

Normal	Normal - Dry Spring 1	Normal - Dry Spring 2
150,000 AF or >90% of Total Storage 6/1 - 8/31 185 CFS 9/1 - 12/31 150 CFS	130,000 - 150,000 AF or 80-90% of Total Storage whichever is less 6/1 - 12/31 150 CFS	<130,000 AF or <80% of Total Storage 6/1 - 12/31 75 CFS

If Lake Mendocino <30,000 AF Storage
10/1 - 12/31 75 CFS

DRY

75 CFS

CRITICAL

25 CFS

Dry Creek

NORMAL	1/1 - 4/30 75 CFS 5/1 - 10/31 80 CFS 11/1 - 12/31 105 CFS
DRY	4/1 - 10/31 25 CFS 11/1 - 3/31 75 CFS
CRITICAL	4/1 - 10/31 25 CFS 11/1 - 3/31 75 CFS

Mouth of Dry Creek

Russian River

NORMAL	125 CFS*
DRY	85 CFS*
CRITICAL	35 CFS*

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Sonoma Water

Russian River Basin
Streamflow Requirements

Per State Water Resources Control Board Decision 1610, April 1986

Figure 1