Sonoma Water

March 19, 2026

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 and the minimum instream flow requirements for the Russian River watershed that were established by State Water Resources Control Board Decision 1610 (Decision 1610) for Permits 12947A, 12949, 12950 and 16596. Accompanying the petitions are the following:

1) *Supplement to the February 2026 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

Due to changes in the operation of the Potter Valley Project by PG&E, the Decision 1610 hydrologic index that defines the water supply condition and minimum instream flow requirements is no longer reflective of reservoir storage or water shed conditions in the Russian River due to its reliance on Lake Pillsbury cumulative inflow and the assumption of historical Potter Valley Project transfers of Eel River water to the East Fork of the Russian River. Additionally, changes to reduce the dry season minimum instream flow requirements are necessary under a *Normal* water supply condition to comply with the findings of the Russian River Biological Opinions issued by the National Marine Fisheries Service (NMFS) on April 29, 2025 (2025 Russian River Biological Opinion) and its predecessor issued on September 24, 2008 (2008 Russian River Biological Opinion).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. The request for an alternative hydrologic index based on Lake Mendocino storage levels originates during the drought of 2013-2015 and was used again during the drought of

2020-2022. The implementation of the alternate hydrologic index was one of several important interventions that prevented Lake Mendocino from going dry in 2021.

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

Sincerely,

Grant Davis
General Manager

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
D. Seymour, T. Schram, J. Martini-Lamb, D. Manning, G. Davis, D. Royall – Sonoma Water
C. O'Donnell, A. Brand, V. Ball – Sonoma County Counsel
R. Bezerra – Bartkiewicz, Kronick & Shanahan

kt ClericalRecords/Shared Documents/OC Natives/2026 OC Natives/03-16-2026/TUCP_Transmittal_13mar2026.docx

Please indicate County where your project is located here:

Sonoma / Mendo.

MAIL FORM AND ATTACHMENTS TO:
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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 12919A Permit 12947A 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 May 1, 2026 to October 27, 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).

Will any current Point of Diversion, Point of Storage, or Place of Use be abandoned? ◯ Yes ◉ No

I (we) have access to the proposed point of diversion or control the proposed place of use by virtue of:
☐ ownership ☐ lease ☐ verbal agreement ☐ written agreement

If by lease or agreement, state name and address of person(s) from whom access has been obtained.

Give name and address of any person(s) taking water from the stream between the present point of diversion or rediversion and the proposed point of diversion or rediversion, as well as any other person(s) known to you who may be affected by the proposed change.

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 3/19/2026 at Santa Rosa, CA.

Right Holder or Authorized Agent Signature

Right Holder or Authorized Agent Signature

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☒ **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:

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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
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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:

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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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Right Holder or Authorized Agent Signature

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☐ **Waste Water** Wat. Code, § 1211

☐ **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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Present:

Proposed:

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Present:

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☐ **Split** Cal. Code Regs., tit. 23, § 836
☐ **Terms or Conditions** Cal. Code Regs., tit. 23, § 791(e)
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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 MARCH 2026 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. The request includes changes to the hydrologic index as well as modifications to the minimum instream flow requirements which were established by the State Water Resources Control Board (State Water Board) Decision 1610. The hydrologic index changes are necessary to ensure that the designated water supply condition and corresponding minimum instream flow requirements in the Russian River watershed are aligned with actual watershed hydrologic conditions, which is essential to maintain sustainable reservoir and river operations protecting municipal water supply and listed salmon species. Additionally, changes to reduce the dry season minimum instream flow requirements are necessary under a *Normal* water supply condition to comply with the findings of the Russian River Biological Opinions issued by the National Marine Fisheries Service (NMFS) on April 29, 2025 (2025 Russian River Biological Opinion) and its predecessor issued on September 24, 2008 (2008 Russian River Biological Opinion). Several relevant terms in the 2008 Russian River Biological Opinion were incorporated into the 2025 Russian River Biological Opinion, as explained in more detail below.

Sonoma Water's water right permits' terms established in Decision 1610 set minimum instream flow requirements in the Russian River based on the water supply condition as determined by a hydrologic index using cumulative inflow into Lake Pillsbury. Located in the Eel River watershed, Lake Pillsbury is a storage reservoir for Pacific Gas & Electric Company's (PG&E) Potter Valley Hydroelectric Project (PVP), which transfers water into the East Fork of the Russian River (East Fork). The PVP operated under a Federal Energy Regulatory Commission (FERC) license that expired on April 14, 2022, and now continues operations under an annual license while PG&E proceeds though a license surrender and decommissioning. PG&E filed a Final License Surrender Application and a Final Non-Project Use of Project Lands Application on July 29. 2025. The Surrender Application includes a decommissioning plan that requests approval to remove most of the PVP's project facilities, including but not limited to, Scott Dam and Cape Horn Dam. The application for Non-Project Use of Project Land seeks FERC's authorization for PG&E to allow the Eel-Russian Project Authority (ERPA) to construct a proposed New Eel-Russian Facility (NERF) for the purpose of future water diversion from the Eel River through the Project's existing water diversion system to the Russian River watershed. FERC's proceedings on PG&E's applications will likely take many years, meaning that it will be years before PVP operations and long-term rules governing any Eel River 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 along with associated discretionary transfers of Eel River water to the East Fork for hydropower generation. With its 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 transfers will be limited to minimum releases to the East Fork Russian River required by its FERC license and water deliveries to the Potter Valley Irrigation District. As a result of the project no longer generating hydropower, the discontinuation of discretionary transfers of Eel River water to the East Fork have resulted in reduction of transfers by up to 456 acre-feet per day[1].

Additionally, on July 23, 2023, and supplemented January 30, 2025, and September 26, 2025, PG&E filed an application for a non-capacity license amendment for the PVP to formalize the flow changes it has been making using temporary variance requests. The non-capacity license amendment is currently under review by FERC and is anticipated to take several years before it is approved.

While the license amendment application is under FERC review, PG&E is expected to continue with annual requests for a temporary variance of flow requirements due to the implications of its decision to no longer close the spillway gates on Scott Dam. On January 30, 2026, PG&E submitted its request for this year. No action has been taken yet, but the request is expected to be approved earlier than previous years as it does not significantly deviate from PG&E's request in 2025 (approved by FERC on August 4, 2025). In the request, PG&E asked for 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 type requirement of 20 cfs; (2) a reduction in minimum release flow requirements for the East Fork triggered by the cessation of Lake Pillsbury spillway flows, to a range of 25 and 5 cfs based on a flexible management flow release strategy. After September 30th, the termination of the order would be dependent on when Lake Pillsbury storage exceeds 36,000 acre-feet.

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 upon which Decision 1610 is based no longer exists. The

[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.

hydrologic index of Decision 1610 is not a reliable metric for Russian River water supply conditions without the historical large inter-basin transfer and no longer functions 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 a *Normal* water supply condition 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 one-month period, 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 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 designations 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 the minimum storage of 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 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 (there have been seven orders since 2013) by the State Water Board. The currently operative order is dated December 23, 2025, and will remain in effect until June 21, 2026. Under this temporary urgency change petition, the requested 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).

In addition to this change to the hydrologic index to establish an appropriate water supply condition for the Russian River watershed, Sonoma Water requests that under the case of a *Normal* water supply condition from May 1 through October 15 that the minimum instream flow requirements be modified to comply with the 2025 Russian River Biological Opinion.

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 12950 (Application 15737). The Decision 1610 requirements for Dry Creek and the Lower

[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.

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 requirements of the 2025 Russian River Biological Opinion.

Currently, Sonoma Water is operating under the temporary urgency change order issued by the State Water Board on December 23, 2025. This order establishes the water supply conditions based on the evaluation of storage thresholds for Lake Mendocino and expires on June 21, 2026.

1.1 MINIMUM FLOW REQUIREMENTS

Decision 1610 requires a minimum flow of 25 cubic feet per second (cfs) in the East Fork of the Russian River (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 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
- 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

- 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 conditions 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

Sonoma Water is currently managing the Russian River under modified criteria with the Lake Mendocino storage threshold hydrologic index that was approved in the December 2025 Temporary Urgency Change Order (TUCO). The Lake Mendocino storage thresholds that establish the water supply conditions of *Normal*, *Dry* or *Critical* are the same as requested in these temporary urgency change petitions and described in Section 4.0.

On the most recent index evaluation date of March 1, 2026, Lake Mendocino storage was 91,474 acre-feet, which exceeded the threshold of 68,400 acre-feet and maintains a *Normal* water supply condition. For the 2026 Water Year, the entire period to date has been designated a *Normal* water supply condition.

From October 1, 2025, through March 13, 2026, the cumulative inflow into Lake Pillsbury was 319,046 acre-feet, which establishes a *Normal* water supply condition for the remainder of the year under Decision 1610 requirements. Consequently, when the TUCO expires on June 21, 2026, the required minimum instream flows in the Upper Russian River under Decision 1610 would be 185 cfs. In the Lower Russian River, the required minimum instream flow would be 125 cfs.

Under Decision 1610, beginning June 1, the required minimum instream flows in the Upper Russian River may be modified for dry spring conditions based on the combined storage of Lake Pillsbury and Lake Mendocino on May 31. At this time, Sonoma Water is unable to confidently project reservoir levels due to the uncertainty that surrounds PG&E's FERC variance request dated January 30, 2026. The timing of the variance approval is significant in the projections of reservoir storage. If the combined storage exceeds 150,000 acre-feet, the water supply condition would be *Normal* with no dry spring classifications.

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 pass through PG&E's hydroelectric generation facilities. Those facilities release diverted water to the East Fork of the Russian River.

As discussed in the introduction above, the PVP powerhouse is inoperable with no plans by PG&E to make necessary repairs and resume operation. This has severely reduced the transfer of Eel River water, which now bypasses the generation facilities. PG&E continues to make transfers to meet FERC license terms and water supply agreement obligations. In addition, PG&E has submitted an application to surrender and decommission the project. While that application is pending, PG&E has submitted variance requests and a license amendment application to FERC that would revise its operations at Lake Pillsbury due to seismic risk mitigation measures. If the variance request is approved as it has been in the past, those changes would result in further reductions in transfers of Eel River water into the East Fork of the Russian River.

2.2 LAKE MENDOCINO

As of March 13, 2026, the water supply storage level in Lake Mendocino was 87,297 acre-feet. This storage level is approximately 115.5 percent of the water supply storage curve for this time of year. Figure 2 shows observed storage in Lake Mendocino from 2017 through March 13, 2026. Current U.S. Army Corps of Engineers (USACE) flood control operations at Lake Mendocino are conducted under Forecast Informed Reservoir Operations (FIRO) procedures, which were recently formalized as an update to the reservoir's Water Control Manual. FIRO allows USACE to retain up to 11,650 acre-feet of water in the flood control pool at its discretion. The storage level as of March 13, 2026, is 97.3 percent of the FIRO pool for this date. From May 11 through October 1, the FIRO storage curve is equivalent to the water supply storage curve at 111,000 acre-feet.

2.3 LAKE SONOMA

As of March 13, 2026, the water supply storage level in Lake Sonoma was 266,045 acre-feet. This storage level is approximately 108.6 percent of the water supply storage curve for this time of year. Figure 3 shows observed storage in Lake Sonoma from 2017 through March 13, 2026. 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. The storage level as of March 13, 2026, is 100.8 percent of the planned deviation pool for this date. From March 1 through September 30, 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 RUSSIAN RIVER BIOLOGICAL OPINION

Central California Coastal (CCC) steelhead, CCC coho salmon, and California Coastal (CC) Chinook salmon are listed as threatened or endangered species under the federal Endangered Species Act (16 U.S.C § 1531 et seq.). In accordance with the requirements of section 7 of the federal Endangered Species Act (16 U.S.C. § 1536), NMFS, the U.S. Army Corps of Engineers (USACE), and Sonoma Water participated in a consultation process involving studies to determine whether the operation of the dams that form Lake Mendocino and Lake Sonoma for water supply and flood control purposes, and channel maintenance operations and other activities in the Russian River would jeopardize the survival and recovery of these listed fish species or adversely modify critical habitat for the species. The consultation process culminated in a 2008 Russian River Biological Opinion (2008 Biological Opinion) issued by NMFS that analyzed project operations for a 15-year period from September 2008 until September 2023. The 2008 Biological Opinion includes summaries of the studies, analyses of the project impacts, and a determination that flows in the late spring, summer and fall in the Upper Russian River and Dry Creek during normal year types, as required by Decision 1610, are too high for optimal juvenile salmonid habitat within the Russian River system. According to the 2008 Biological Opinion, two types of issues are associated with the summer flows required by Decision 1610: (1) the flows create current velocities that limit the amount of freshwater rearing habitat available to salmonids; and (2) the flow release requirements deplete the cold-water pool in Lake Mendocino, contributing to relatively high water temperatures, which reduce the quality of available rearing habitat. The 2008 Biological Opinion also found that the minimum instream flows required by Decision 1610 for the Lower Russian River during the summer months adversely affect critical habitat in the Russian River estuary by causing artificially elevated inflow to the estuary, which requires breaching of the sand bar at the river's mouth to avoid local flooding.

Among other measures, the 2008 Biological Opinion required Sonoma Water to seek changes to Decision 1610 flow requirements during the spring, summer, and fall months to maintain suitable habitat for CCC steelhead and CCC coho salmon and avoid take under the Endangered Species Act and described requirements for improving habitat in Dry Creek downstream of Lake Sonoma, including upper flow limits to protect habitat.

The 2008 Biological Opinion required Sonoma Water to petition to the State Water Board to change Decision 1610 on a long-term basis and on an interim basis pending approval of long-term changes. Accordingly, Sonoma Water filed petitions with the State Water Board on September 23, 2009, to permanently change Decision 1610 minimum instream flow requirements. The 2008 Biological Opinion required that Sonoma Water petition the State Water Board for temporary changes to the Decision 1610 minimum instream flow requirements beginning in 2010 and for each year until the State Water Board issues an order on Sonoma Water's petition for the permanent changes to these requirements.

Sonoma Water withdrew the petitions filed on September 23, 2009, and filed new petitions on August 16, 2016, to permanently change the minimum instream flow requirements.

The 2008 Biological Opinion analyzed project operations through September 2023. The USACE and Sonoma Water consulted with NMFS (with involvement of CDFW) to develop a Biological Assessment for continuation of the USACE and Sonoma Water operations in the Russian River watershed. A final Biological Assessment was submitted to NMFS in September 2023, which NMFS determined to be complete in February 2024. The Biological Assessment was used by NMFS for a new Biological Opinion authorizing incidental take of Chinook salmon, coho salmon, and steelhead related to water supply and flood control operations, and channel maintenance and other activities in portions of the Russian River watershed.

On April 29, 2025, NMFS issued the new 2025 Biological Opinion to the USACE, Sonoma Water, and the Mendocino County Russian River Flood Control and Water Conservation Improvement District (RRFC). The 2025 Biological Opinion has a 10-year term and covers the USACE and Sonoma Water's operations and maintenance activities, including water supply, flood control, channel maintenance and habitat restoration in the Russian River watershed. Key elements of the Proposed Action evaluated in the 2025 Biological Opinion include: continued habitat enhancement efforts in Dry Creek; revised Russian River Estuary adaptive management; studies on migration and survival of hatchery and wild salmonids (including coho salmon smolt survival studies in the lower Russian River and steelhead smolt survival studies in the upper Russian River); reservoir flood control and water supply operations at Coyote Valley Dam (Lake Mendocino) and Warm Springs Dam (Lake Sonoma); and continued improvements to reservoir management. Specifically, these improvements include Forecast Informed Reservoir Operations (FIRO) at Coyote Valley Dam (Lake Mendocino) and Warm Springs Dam (Lake Sonoma) and time-limited changes to the Russian River Hydrologic Index (water year classifications) to be based on Lake Mendocino storage thresholds rather than Lake Pillsbury storage in the Eel River watershed, and request, via interim petitions, changes to Decision 1610 minimum flows during Normal and Dry hydrologic conditions in a manner consistent with the Reasonable and Prudent Alternative from the 2008 Biological Opinion. Ramping rates to protect against stranding of fish, which were previously included as terms and conditions in TUCP Orders, are included in the Proposed Action evaluated in the 2025 Russian River Biological Opinion.

These changes were included in the Proposed Action to avoid potential take of listed salmonids. NMFS determined that these actions will improve water reliability and benefit salmon and steelhead through enhanced cold-water storage resulting in sustained cooler water temperatures during the summer and fall rearing season and greater flexibility to release water to facilitate fish migration.

Survival studies may require pulse flows to assist in facilitating outmigration of smolts, these flows will be discussed as part of the Reservoir Operations Working Group, which is required by the 2025 Biological Opinion. The Proposed Action evaluated in the 2025 Russian River Biological Opinion included conservation measures to aid in migration of salmonids, including for hatchery steelhead smolt releases from Coyote Valley Dam, through pulse flow releases from Lake Mendocino and blockwater releases from Lake Sonoma. The Reservoir Operations Working Group will meet to plan for these releases as needed. NMFS concluded that the Proposed Action "is not likely to jeopardize the continued existence" of CCC coho salmon, CC Chinook salmon, CCC steelhead, or Southern Resident Killer Whale, nor is it likely to destroy or adversely modify their designated critical habitat. This is a significant change from the 2008 Biological Opinion, which was a jeopardy opinion; the 2025 Biological Opinion is a non-jeopardy opinion, which reflects improvements in operations and conservation measures.

4.0 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
4. The proposed change is in the public interest.

4.1 URGENCY OF THE PROPOSED CHANGE

For these petitions, an urgent need exists to implement the proposed changes due to significant changes in PVP operations and the requirements of the 2025 Russian River Biological Opinion.

With 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. Under these conditions, an evaluation of the hydrologic condition in the Russian River is more appropriately established by conditions in its watershed. Without the proposed changes to the hydrologic index to establish an

appropriate water supply condition, 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.

Decision 1610 set the minimum instream flow requirements that the State Water Board concluded, in 1986, would benefit both fishery and recreation uses, and would "preserve the fishery and recreation in the river and in Lake Mendocino to the greatest extent possible while serving the needs of the agricultural, municipal, domestic, and industrial uses which are dependent upon the water" (D 1610, § 13.2, page 21). The State Water Board also concluded in Decision 1610 that additional fishery studies should be done (D 1610, § 14.3.1, pages 26-27).

As discussed in the 2025 Russian River Biological Opinion, time-limited changes to the Russian River Hydrologic Index (water year classifications) to be based on Lake Mendocino storage thresholds rather than Lake Pillsbury storage in the Eel River watershed, and requested, via interim petitions, changes to Decision 1610 minimum flows during Normal and Dry hydrologic conditions in a manner consistent with the Reasonable and Prudent Alternative from the 2008 Biological Opinion. These changes were included in the Proposed Action to avoid potential take of listed salmonids. NMFS determined that these actions will improve water reliability and benefit salmon and steelhead through enhanced cold-water storage resulting in sustained cooler water temperatures during the summer and fall rearing season and greater flexibility to release water to facilitate fish migration.

The temporary changes that are requested in these petitions will improve habitat for the listed species by reducing instream flow velocities and by increasing cold water storage for later fishery use, without unreasonably impairing other beneficial uses, thus maximizing the use of Russian River water resources. Moreover, given the listings of Chinook salmon, coho salmon, and steelhead under the federal ESA, there is a need for prompt action. As demonstrated by the 2025 Russian River Biological Opinion, there has been an extensive analysis of the needs of the fishery, and fishery experts agree that the Decision 1610 minimum instream flows appear to be too high. In light of this background, an urgent need exists for the proposed change of the minimum instream flow requirements under the case of a *Normal* water supply condition.

4.2 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.

4.3 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.

In addition, if the hydrologic index establishes a *Normal* water supply condition, then these petitions would implement minimum instream flow requirements based upon the analysis contained in the 2025 Russian River Biological Opinion, which included measures to improve conditions for salmonid resources in the Russian River system. Two types of improved conditions will result from an order approving these petitions. First, the instream flow velocities will be reduced in salmonid rearing habitat. If these petitions are granted, then lower stream flows, which will result in better salmonid rearing habitat, will occur. Second, lowering the required minimum instream flows will result in higher fall storage levels in Lake Mendocino. The resulting conservation of water in Lake Mendocino will improve water reliability and benefit salmon and steelhead through enhanced cold-water storage resulting in sustained cooler water temperatures during the summer and fall rearing season and greater flexibility to release water to facilitate fish migration.

It is possible that reduced flows in the Russian River may impair some instream beneficial uses, principally recreational uses. However, although some recreational uses may be affected by these reduced flows, any such impacts on recreation this summer will be reasonable in light of the impacts to fish that could occur if the petitions were not approved.

4.4 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.

Moreover, another key purpose of these petitions is to improve conditions under *Normal* water supply conditions for listed Russian River salmonid species, as determined by NMFS and CDFW. Approval of Sonoma Water's petitions to reduce instream flow requirements to benefit the fishery will also result in higher fall storage levels in Lake Mendocino, which will make more water available in the fall for fishery purposes.

Under these circumstances, it is in the public interest to temporarily modify the hydrologic index and change the Decision 1610 minimum required instream flows.

5.0 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, as well as to protect listed salmonids, Sonoma Water is filing these petitions requesting that the State Water Board make the following temporary changes to the Decision 1610 requirements[3]:

Starting from the date of the order for a period of 180 days, the minimum instream flow requirements for the Russian River will be established using an index based on water storage in Lake Mendocino, rather than the current index required in Sonoma Water's permits based on cumulative inflow into Lake Pillsbury. This temporary change is requested to ensure 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 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

[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.

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. 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. The 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 PG&E's 2023 variance order and similar to the variance request filed on January 30, 2026; refer to the technical memorandum in Attachment A). 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.

Additionally, Sonoma Water will continue to work with the State Water Board, USACE, NMFS, and CDFW to implement flows required under the Russian River Biological Opinions. To be in accordance with the terms and conditions of the 2025 Russian River Biological Opinion, Sonoma Water is requesting that the State Water Board make the following changes to Sonoma Water's permits for a period from May 1, 2026, until October 15, 2026:

(1) reduce the required minimum instream flow in the Russian River from the confluence of the East and West Forks to the river's confluence with Dry Creek from 185 cfs to 125 cfs; and

(2) reduce required minimum instream flow in the Russian River from its confluence with Dry Creek to the Pacific Ocean from 125 cfs to 70 cfs.

If approved, under a *Normal* water supply condition, the 2025 Russian River Biological Opinion minimum instream flows will be in effect. During this period, Sonoma Water requests (as in previous petitions) that the minimum instream flow requirements be implemented on a 5-day running average of average daily streamflow measurements with the condition that instantaneous flows on the Upper Russian River be no less than 110 cfs and on the Lower Russian River be no less than 60 cfs. The purpose is to improve efforts at achieving the optimal habitat conditions in the Lower Russian River and to optimally manage flows in the entire river. This adjustment will allow Sonoma Water to manage stream flows with a smaller operational buffer, thereby facilitating the attainment of the lower flow conditions that the Russian River Biological Opinions identify as being conducive to the enhancement of salmonid habitat. Reducing the operational buffer will also conserve water supply in Lake Mendocino, resulting in higher storage levels in the fall for increased releases for migrating Chinook salmon and improving carry over storage for the following year.

6.0 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.

7.0 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 2025 water production totals were 16 percent below 2020 totals. Water production for January 2025 is equal to January 2020 and reflects lower wintertime water demands and savings opportunities available. It is anticipated that the 2026 demand reduction compared to 2020 will increase when the irrigation months arrive.

Work is underway to complete Sonoma Water's 2026 Annual Water Supply and Demand Assessment (AWSDA) and Shortage Report, with preliminary results projecting ample water supplies available to meet contractors' unconstrained demands through June 2027, even when conservatively estimating dry conditions through that time frame.

Consequently, no shortage stage implementation is anticipated for Sonoma Water or its contractors in the period from July 2026 through June 2027. Sonoma Water's AWSDA results and Shortage Report are on schedule to be submitted to the Department of Water Resources prior to July 1, 2026.

The Partnership, in collaboration with the Russian River Watershed Association, hosted the 8th biennial Russian River Friendly Landscaping Symposium on April 11th at the Finley Center in Santa Rosa. Called, *Turf's Up! Tree Care and Lawn Conversion in a New Regulatory Landscape*, the half-day event covered a variety of topics related to AB 1572 compliance for an audience of landscape contractors, HOA and business property managers, landscape design professionals, and municipal and other public agency staff. In addition to covering regulatory compliance requirements, the event featured a presentation about the non-functional turf toolkit and website developed by the California Water Efficiency Partnership, and case study presentations about protecting trees during turf conversions, how to tackle large HOA projects, and a business park turf conversion project. In addition to the presentations, the event included a resource and networking fair, with booths and tables staffed by local irrigation companies, a plant nursery, non-profits, and the North Coast chapter of the California Landscape Contractors Association.

The Partnership is once again promoting the Dye Tab Challenge social media campaign this spring to incentivize customers to complete and report the results of toilet leak tests during February and March. Free leak dye-test tablets were distributed by mail or made available for pickup at utility offices. The Dye Tab Challenge coincides with the national E.P.A. WaterSense Program's Fix a Leak Week Campaign held March 16 to 22. The Partnership is promoting Fix a Leak Week through daily social media posts on Facebook, X, Instagram, and Nextdoor. On May 9th, the Partnership will host the 16th annual Eco-Friendly Garden Tour at 26 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.

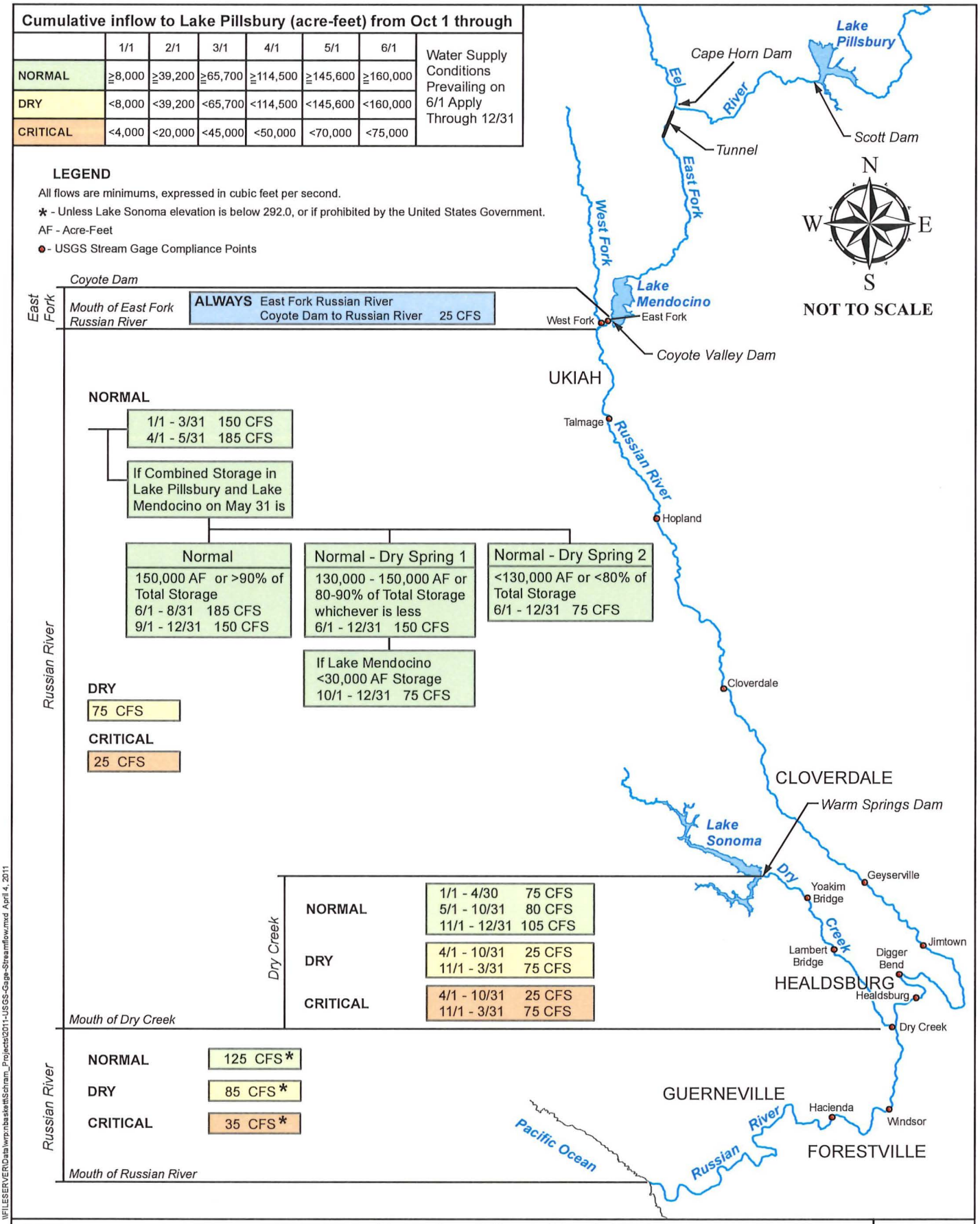
Development of the Partnership's summer outreach campaign is underway which will run from June through September. This year's theme will focus on the multiple benefits of converting lawns to low water use landscapes using customer testimonials and case studies. In addition to residential projects, the campaign will focus on the new law prohibiting the use of potable water to irrigate non-functional turf on commercial, industrial, and institutional properties. The campaign will offer inspiration and lessons learned from lawn removal projects already completed at homes and businesses throughout the region. Weekly social media ads are planned over the 16-week campaign in addition to online and print ad placements, with links to case studies made available on the Partnership's website.

The Partnership will continue its practice of tabling at in-person events in the spring, summer, and fall at popular community events such as Earth Day, the City of Santa Rosa WaterSmart Expo, Zero Waste Sonoma's Fix-it Fair, and the annual Fiesta de Independencia held at the Luther Burbank Center for the Arts. The Partnership is once again planning to sponsor a landscape display in the Hall of Flowers Courtyard Annex at the Sonoma County Fair in collaboration with the Master Gardener Program of Sonoma County. The exhibit will reinforce the summer outreach message highlighting the multiple benefits of a low water use landscape.

Lastly, the Partnership hosted a Qualified Water Efficient Landscaper (QWEL) training in March and will teach a class in April on rainwater catchment system design and installation. The QWEL program is an EPA WaterSense labeled professional certification in irrigation system audits. QWEL Pros receive training in efficient irrigation principles and sustainable landscaping practices. The program has recently expanded to offer training to landscape professionals interested in learning about and growing their services to include rainwater catchment system design and installation.

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

FIGURES


Cumulative inflow to Lake Pillsbury (acre-feet) from Oct 1 through
1/1 2/1 3/1 4/1 5/1 6/1
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
Water Supply Conditions Prevailing on 6/1 Apply Through 12/31
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
Scott Dam
Tunnel
East Fork
West Fork
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
Lake Mendocino
West Fork
East Fork
Coyote Valley Dam
UKIAH
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
150,000 AF or >90% of Total Storage
6/1 - 8/31 185 CFS
9/1 - 12/31 150 CFS
Normal - Dry Spring 1
130,000 - 150,000 AF or 80-90% of Total Storage whichever is less
6/1 - 12/31 150 CFS
If Lake Mendocino <30,000 AF Storage
10/1 - 12/31 75 CFS
Normal - Dry Spring 2
<130,000 AF or <80% of Total Storage
6/1 - 12/31 75 CFS
Talmage
Russian River
Hopland
Cloverdale
DRY
75 CFS
CRITICAL
25 CFS
Russian River
CLOVERDALE
Warm Springs Dam
Lake Sonoma
Dry Creek
Geyserville
Yoakim Bridge
Jimtown
Lambert Bridge
Digger Bend
HEALDSBURG
Healdsburg
Dry Creek
Mouth of 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
Russian River
NORMAL 125 CFS*
DRY 85 CFS*
CRITICAL 35 CFS*
GUERNEVILLE
Hacienda
Windsor
Pacific Ocean
Russian River
FORESTVILLE
Mouth of Russian River
\\FILESERVER\Data\wrp.tbasketti\Schram_Projects\2011-USGS-Gage-Streamflow.mxd April 4, 2011
Sonoma Water
Russian River Basin
Streamflow Requirements
Per State Water Resources Control Board Decision 1610, April 1986
Figure 1

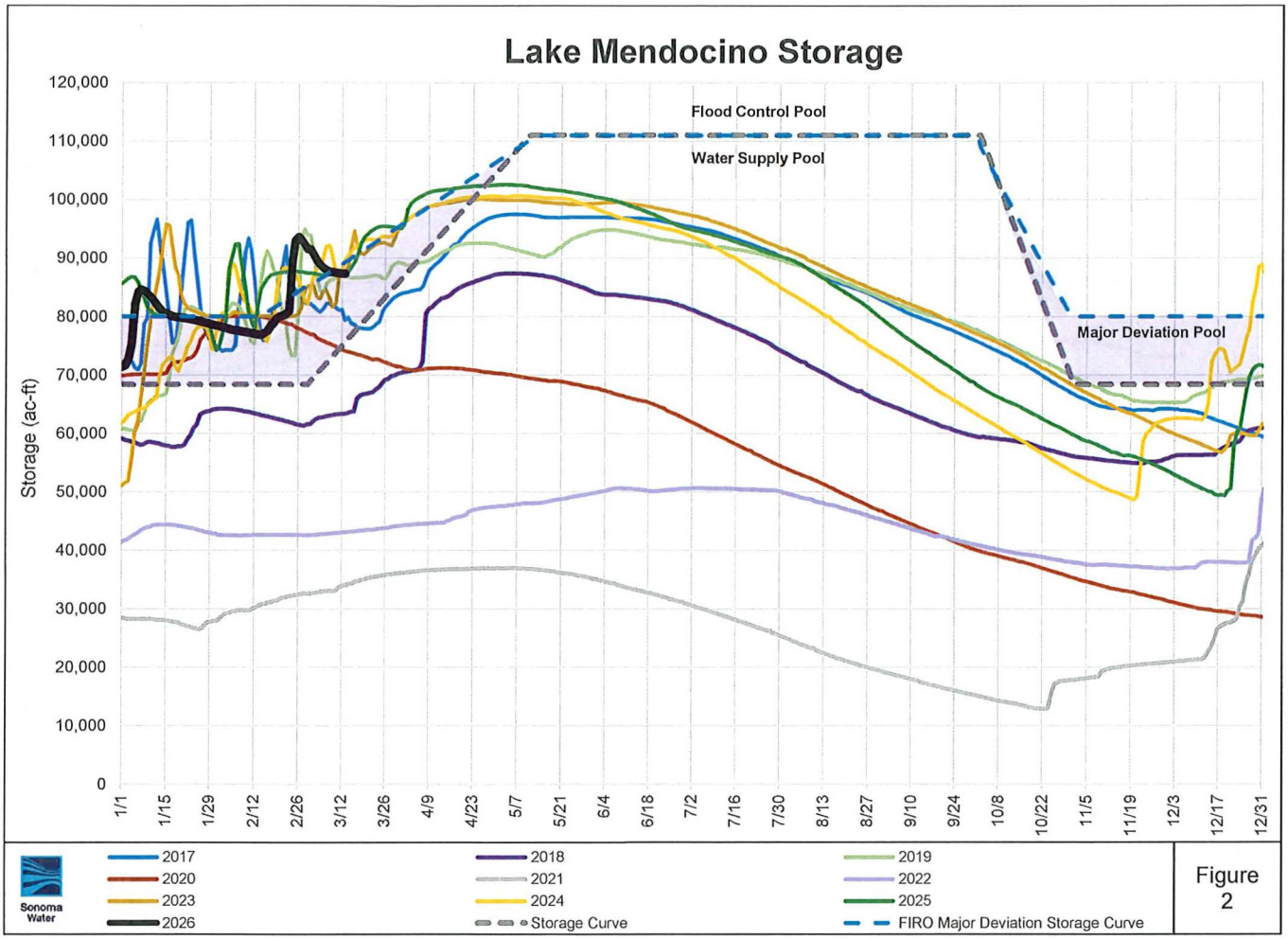

Lake Mendocino Storage
Storage (ac-ft)
120,000
110,000
100,000
90,000
80,000
70,000
60,000
50,000
40,000
30,000
20,000
10,000
0
Flood Control Pool
Water Supply Pool
Major Deviation Pool
1/1
1/15
1/29
2/12
2/26
3/12
3/26
4/9
4/23
5/7
5/21
6/4
6/18
7/2
7/16
7/30
8/13
8/27
9/10
9/24
10/8
10/22
11/5
11/19
12/3
12/17
12/31
Sonoma Water
2017
2018
2019
2020
2021
2022
2023
2024
2025
2026
Storage Curve
FIRO Major Deviation Storage Curve

Figure 2

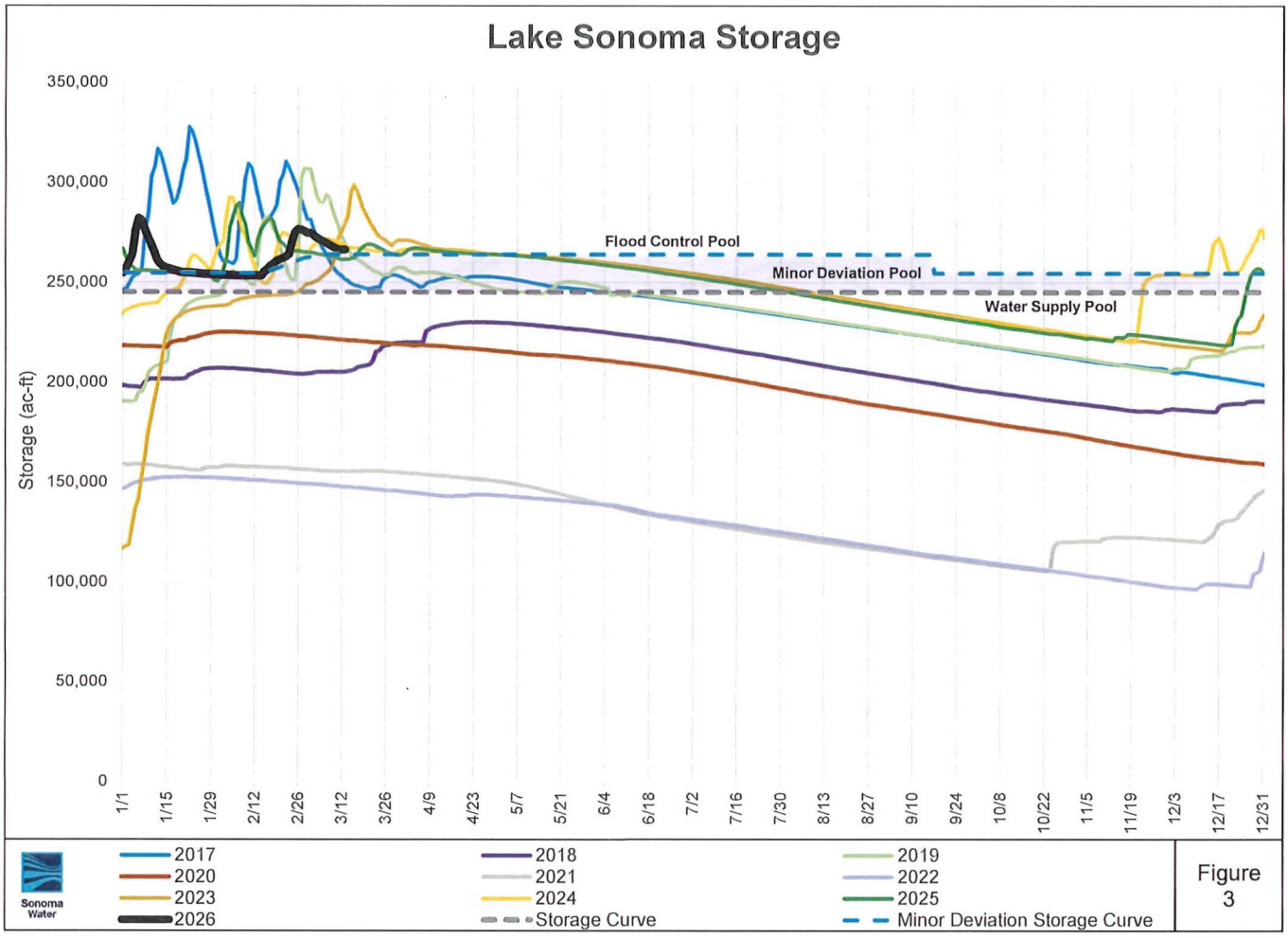

Lake Sonoma Storage
350,000
300,000
250,000
200,000
150,000
100,000
50,000
0
Storage (ac-ft)
Flood Control Pool
Minor Deviation Pool
Water Supply Pool
1/1
1/15
1/29
2/12
2/26
3/12
3/26
4/9
4/23
5/7
5/21
6/4
6/18
7/2
7/16
7/30
8/13
8/27
9/10
9/24
10/8
10/22
11/5
11/19
12/3
12/17
12/31
Sonoma Water
2017
2018
2019
2020
2021
2022
2023
2024
2025
2026
Storage Curve
Minor Deviation Storage Curve

Figure 3

SONOMA COUNTY WATER AGENCY

TECHNICAL MEMORANDUM

DATE: MARCH 13, 2026

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 April 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), February 14, 2025 (Approved on August 4, 2025), and January 30, 2026 (in review). PG&E also requested an amendment to the FERC license on January 30, 2025 (being modified after stakeholder input), that would result in PVP operations that are slightly different than described in the October 2023 flow variance request, but consistent with the January 2026 flow variance request after the modifications are implemented. 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 January 2026 flow variance request, essentially the same changes to minimum releases were requested with only a slight variation in the specific conditions that authorized decreasing to 5 cfs. The January 2026 request seeks to decrease minimum instream flow requirements to the East Fork of the Russian River to 25 cfs after April 15th as soon as uncontrolled release from Scott Dam ceases. In the October 2023 order, the decrease from 25 cfs to 5 cfs minimum instream flow requirement was dependent on release temperatures out of Lake Pillsbury. In the January 2026 request, the reduction from 25 cfs to 5 cfs is dependent on projected fall storage in Lake Pillsbury. The modified operating conditions under these orders and requests 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 year's historical 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 and 2024 orders, but slightly different than the 2026 variance 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 the 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 priority in developing the proposed hydrologic index was ensuring 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

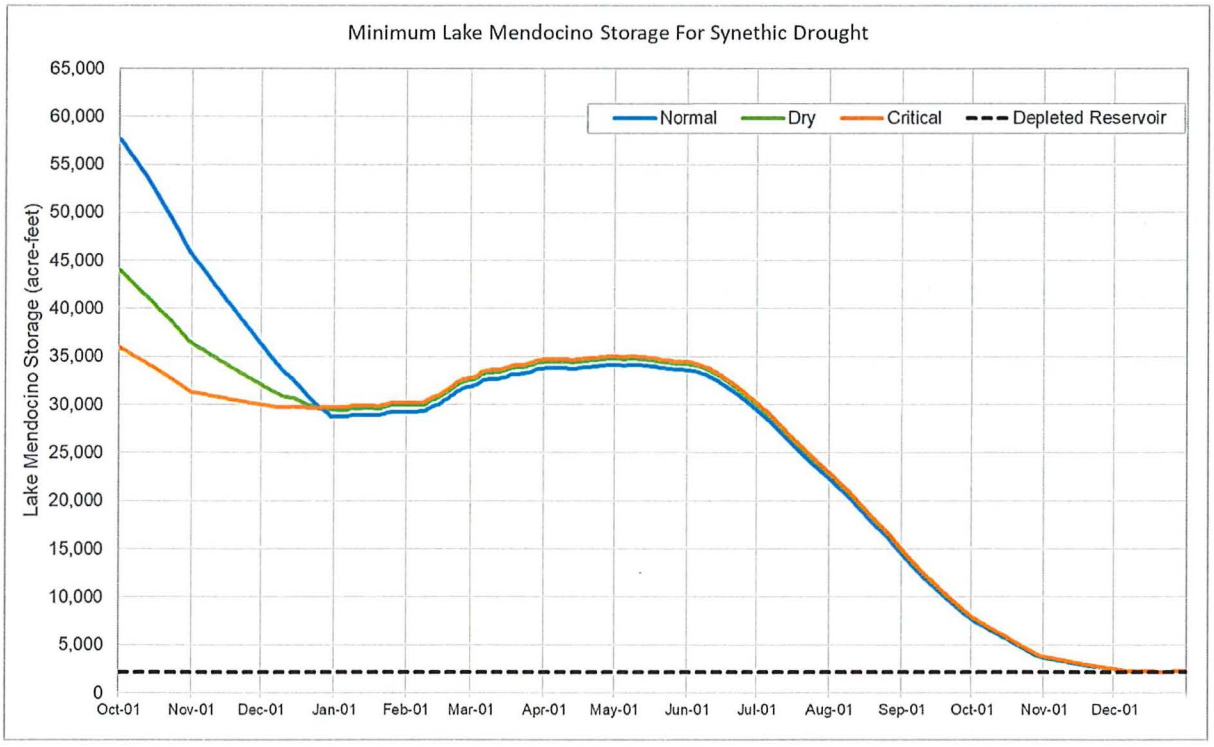


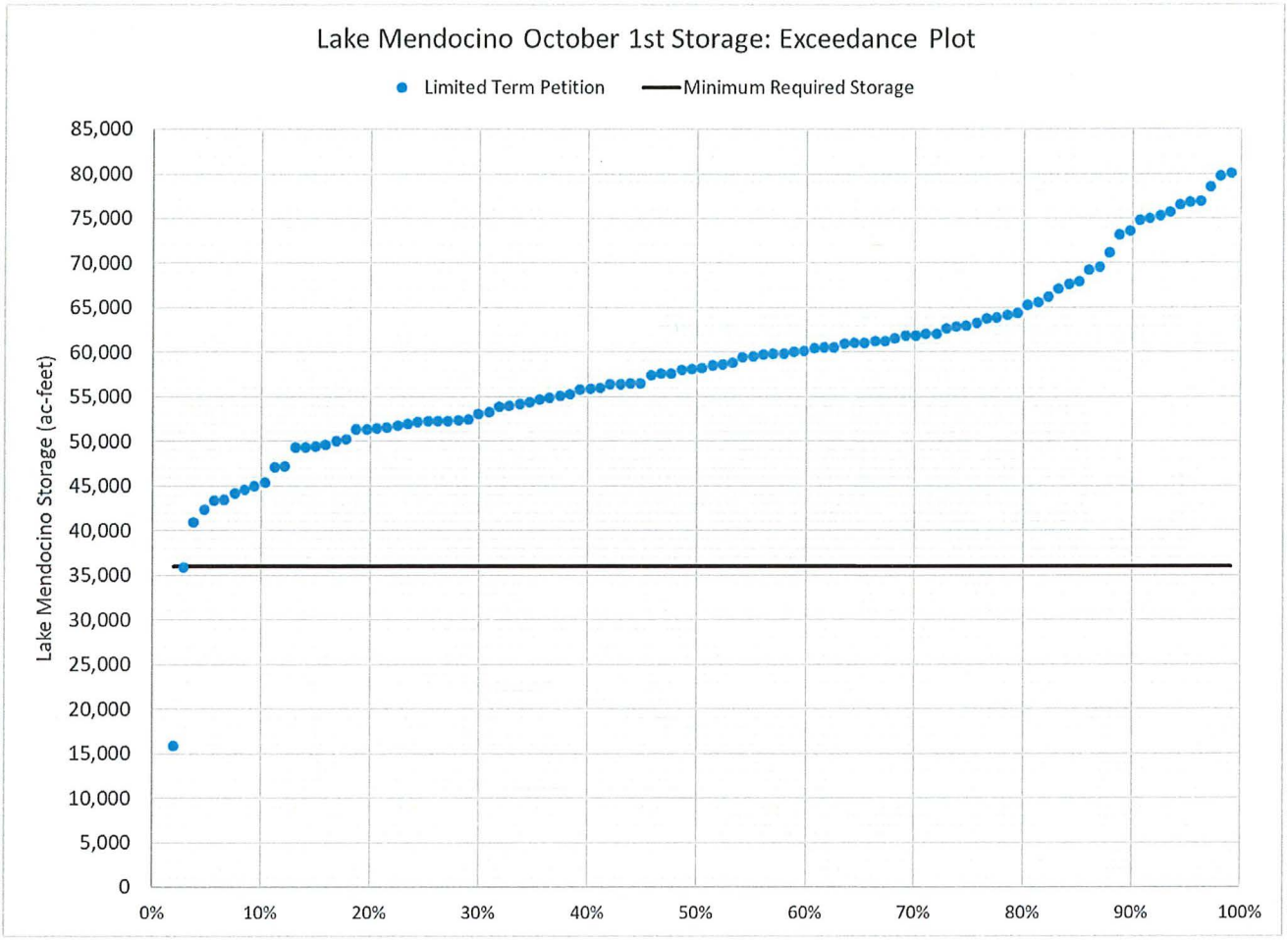
Figure 2: Minimum Required Lake Mendocino Storage for 1 in 100-year Drought

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 to not meet 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



The final storage thresholds for the proposed hydrologic index are shown in Figure 4. The thresholds were finalized based on an iterative process resulting in a distribution of water supply conditions that are shown in Figure 5. April through December time periods with *Normal* water supply condition ranges between 42% and 63%, *Dry* conditions between 28% and 49%, and *Critical* condition between 6% and 9%. From January through March there is more variation in the water supply condition distribution due to the storage thresholds being limited by the Lake Mendocino conservation pool. The RR ResSim model assumes Lake Mendocino can store water up to the maximum that is authorized under the major deviation limit that is currently in place and is expected to be formalized in a water control manual update. However, the storage thresholds are set to the conservation pool because Sonoma Water does not have operational control above that storage level.

The simulation results show that for February, Lake Mendocino sees large enough inflows to increase storage above the conservation pool in 69% of the years of the historical dataset. The occurrence of *Normal* water supply conditions in the summer were decreased compared to the fall to allow higher flows during steelhead and salmonid outmigration.

Figure 4: Lake Mendocino Storage Thresholds

Storage Thresholds and Evaluation Dates for Proposed Hydrologic Index (ac-ft)

	1/1	*2/1*	*3/1*	*3/16*	*4/1*	*4/16*	*5/1*	*5/16*	*6/1*	*10/1*	*11/1*	*12/1*
Dry	68,400	68,400	68,400	77,000	86,000	91,000	93,000	94,000	94,000	58,000	51,000	49,000
Critical	42,000	49,000	57,000	67,000	73,000	74,000	75,000	76,000	76,000	46,000	41,000	40,000

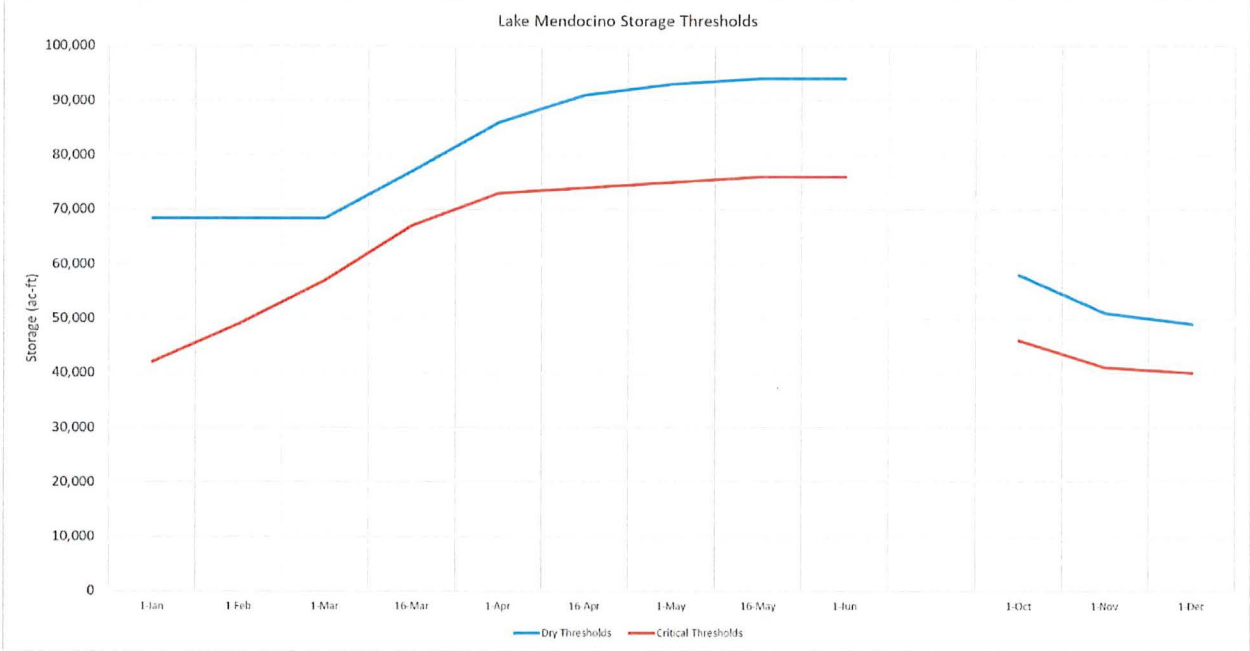


Figure 5: Percent Occurrence of Water Supply Conditions in Proposed Hydrologic Index

Water Supply Condition - Percent Occurrence			
Month	1	2	3
Jan	44%	51%	5%
Feb	69%	20%	11%
Mar	84%	10%	7%
Apr	63%	28%	8%
May	44%	47%	9%
Jun	42%	49%	9%
Jul	42%	49%	9%
Aug	42%	49%	9%
Sep	42%	48%	9%
Oct	51%	39%	9%
Nov	54%	37%	8%
Dec	57%	38%	6%
Average	**53%**	**39%**	**8%**

State of California
State Water Resources Control Board
DIVISION OF WATER RIGHTS
P.O. Box 2000, Sacramento, CA 95812-2000
Tel: (916) 341-5300 Fax: (916) 341-5400
http://www.waterboards.ca.gov/waterrights

ENVIRONMENTAL INFORMATION FOR PETITIONS

This form is required for all petitions.

Before the State Water Resources Control Board (State Water Board) can approve a petition, the State Water Board must consider the information contained in an environmental document prepared in compliance with the California Environmental Quality Act (CEQA). This form is not a CEQA document. If a CEQA document has not yet been prepared, a determination must be made of who is responsible for its preparation. As the petitioner, you are responsible for all costs associated with the environmental evaluation and preparation of the required CEQA documents. Please answer the following questions to the best of your ability and submit any studies that have been conducted regarding the environmental evaluation of your project. If you need more space to completely answer the questions, please number and attach additional sheets.

DESCRIPTION OF PROPOSED CHANGES OR WORK REMAINING TO BE COMPLETED

For a petition for change, provide a description of the proposed changes to your project including, but not limited to, type of construction activity, structures existing or to be built, area to be graded or excavated, increase in water diversion and use (up to the amount authorized by the permit), changes in land use, and project operational changes, including changes in how the water will be used. For a petition for extension of time, provide a description of what work has been completed and what remains to be done. Include in your description any of the above elements that will occur during the requested extension period.

See 'Supplement to the March 2026 Temporary Urgency Change Petitions' for a summary of the requested changes.

Insert the attachment number here, if applicable: [ ]

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: 3/12/2026

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:

During a meeting held on February 17, 2026, with Bryan McFadin of the North Coast Regional Water Quality Control Board (NCRWQCB), Sonoma Water staff Jessica Martini-Lamb, Jeff Church discussed water quality monitoring under the current order as well as describing the pending filing of these temporary urgency change petitions. On March 12, 2026, Jessica Martini-Lamb sent a follow-up email to Bryan McFadin to confirm the filings of these temporary urgency change petitions.

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 3/19/2026 at Santa Rosa, CA .

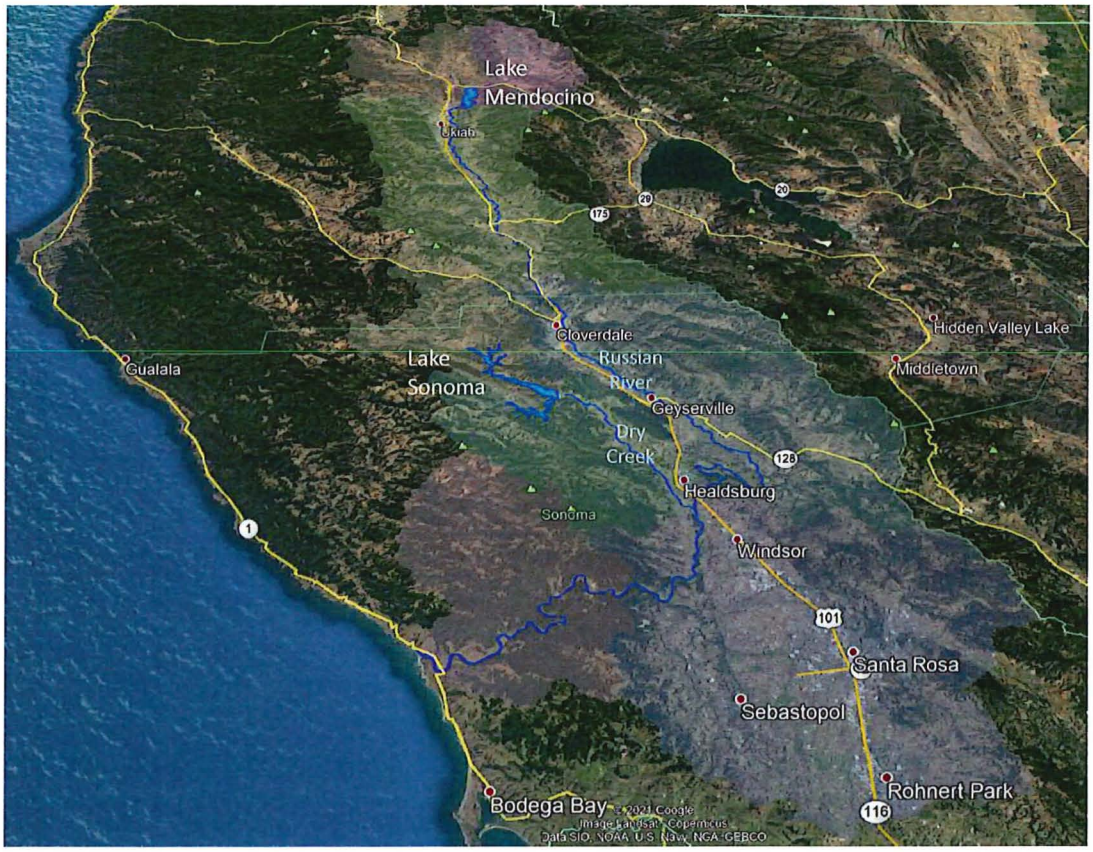
Water Right Holder or Authorized Agent Signature

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.)**

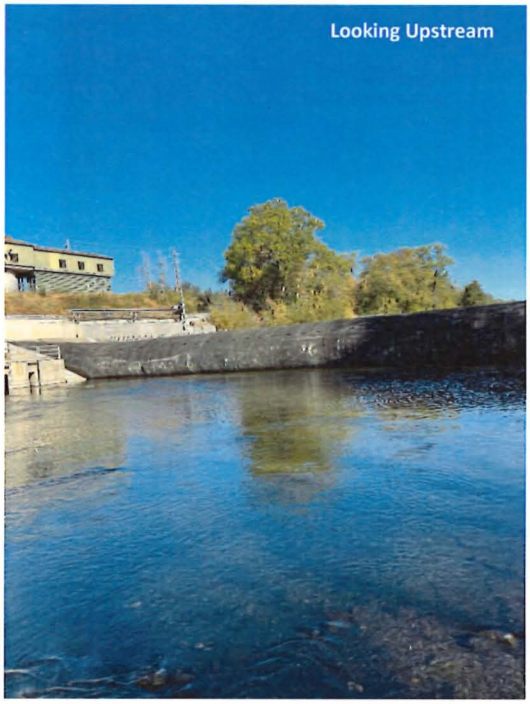
SONOMA WATER
Russian River Watershed Place of Water Use

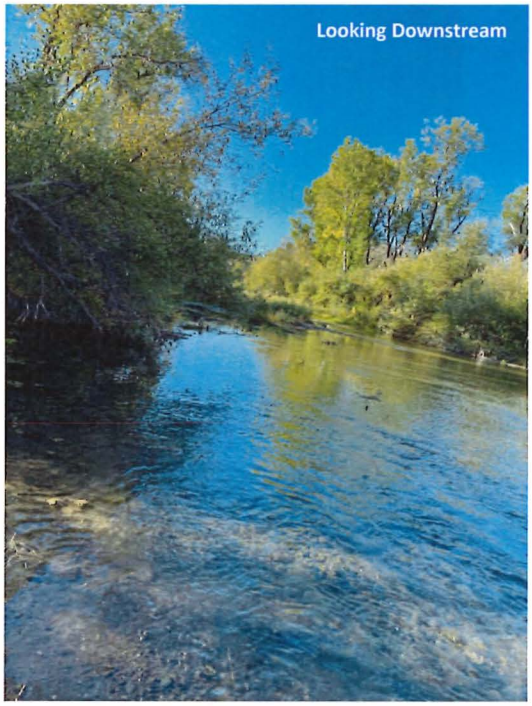


SONOMA WATER

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 Sonoma
585 Fiscal Drive, Room 103
Santa Rosa, CA 95403

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

Project Title: Petition by Sonoma County Water Agency Requesting Approval of a Temporary Urgency Change in Permits 12947A, 12949, 12950 and 16596 in Mendocino and Sonoma Counties (Applications 12919A, 15736, 15737, and 19351): 2026 Temporary Changes to Minimum Instream Flow Requirements and Hydrologic Index of Decision 1610

Project Location Specific: The 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, and in the Lower Russian River from its confluence with Dry Creek to the Pacific Ocean. Figure 1 shows the minimum instream streamflow 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 established Sonoma Water's water right permits' terms that specify the hydrologic index that determines 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 with water supply conditions based largely on cumulative inflow into Lake Pillsbury.

Located in the Eel River watershed, Lake Pillsbury is a storage reservoir for Pacific Gas & Electric Company's (PG&E) Potter Valley Hydroelectric Project (PVP), which transfers water into the East Fork of the Russian River (East Fork). The PVP operated under a Federal Energy Regulatory Commission (FERC) license that expired on April 14, 2022, and now continues operations under an annual license while PG&E proceeds though a license surrender and decommissioning. PG&E filed a Final License Surrender Application and a Final Non-Project Use of Project Lands Application on July 29. 2025. The Surrender Application includes a decommissioning plan that requests approval to remove most of the PVP's project facilities, including but not limited to, Scott Dam and Cape Horn Dam. The application for Non-Project Use of Project Land seeks FERC's authorization for PG&E to allow the Eel-Russian Project Authority (ERPA) to construct a proposed New Eel-Russian Facility (NERF) for the purpose of future water diversion from the Eel River through the Project's existing water diversion system to the Russian River watershed. FERC's proceedings on PG&E's applications will likely take many years, meaning that it will be years before PVP operations and long-term rules governing any Eel River imports to the Russian River watershed are resolved.

Multiple changes to the PVP operations have reduced and could further reduce the transfers of Eel River water into the Russian River. 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. PG&E also submitted a long-term flow regime request to amend flow requirements under the current FERC license on July 31, 2023. 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. With hydropower operations no longer occurring at the project, PG&E has stated that transfers will be limited to the minimum releases to the East Fork required by its FERC license and

water deliveries to the Potter Valley Irrigation District. As a result of the project no longer generating hydropower, the discontinuation of discretionary transfers of Eel River water to the East Fork have resulted in reduction of transfers by up to 456 acre-feet per day.

Additionally, on July 23, 2023, and supplemented on January 30, 2025, and September 26, 2025, PG&E filed an application for a non-capacity license amendment for the PVP to formalize the flow changes it has been making using temporary variance requests. The non-capacity license amendment is currently under review by FERC and is anticipated to take several years before it is approved.

While the license amendment application is under FERC review, PG&E is expected to continue with annual requests for a temporary variance of flow requirements due to the implications of its decision to no longer close the spillway gates on Scott Dam. On January 30, 2026, PG&E submitted its request for this year. No action has been taken yet, but the request is expected to be approved earlier than previous years as it does not significantly deviate from PG&E's request in 2025 (approved by FERC on August 4, 2025). In the request, PG&E asked for 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 type requirement of 20 cubic feet per second (cfs); (2) a reduction in minimum release flow requirements for the East Fork triggered by the cessation of Lake Pillsbury spillway flows, to a range of 25 and 5 cfs based on a flexible management flow release strategy. After September 30th, the termination of the order would be dependent on when Lake Pillsbury storage exceeds 36,000 acre-feet.

Sonoma Water is petitioning for temporary urgency changes to its four water-right permits used to provide wholesale water to cities and water districts in Sonoma and Marin counties. The historical link between the two watersheds upon which Decision 1610 is based is no longer applicable. The hydrologic index of Decision 1610 is not a reliable metric for Russian River water supply conditions without the historical large inter-basin transfer and will not function as intended. The request includes changes to the hydrologic index as well as modifications to the minimum instream flow requirements. The hydrologic index changes are necessary to ensure that the designated water supply condition and corresponding minimum instream flow requirements in the Russian River watershed are aligned with actual watershed hydrologic conditions, which is essential to maintain sustainable reservoir and river operations protecting municipal water supply and listed salmon species. Additionally, changes to reduce the dry season minimum instream flow requirements are necessary under a designated *Normal* water supply condition to comply with the findings of the 2025 Russian River Biological Opinion issued by the National Marine Fisheries Service (NMFS) on April 29, 2025, (2025 Russian River Biological Opinion) and its predecessor issued on September 24, 2008 (2008 Russian River Biological Opinion).

NMFS' 2008 Russian River Biological Opinion required changes to the Decision 1610 minimum instream flow requirements to enable alternative flow management scenarios that will increase available rearing habitat in Dry Creek and the Upper Russian River, and provide a lower, closer-to-natural inflow to the estuary between late spring and early fall, thereby enhancing the potential for maintaining a seasonal freshwater lagoon that will likely support increased production of juvenile steelhead and salmon. As required by the 2008 Russian River Biological Opinion, in September 2009 Sonoma Water filed petitions with the State Water Board to make permanent changes to the Decision 1610 minimum instream flow requirements. These petitions were withdrawn and replaced with new petitions filed in August 2016, which are presently pending before the State Water Board. The State Water Board will not act on these petitions until the necessary environmental impact report is prepared and the water-rights issues associated with these petitions are resolved.

The 2025 Russian River Biological Opinion has a 10-year term and covers the U.S. Army Corps of Engineers and Sonoma Water's operations and maintenance activities, including water supply, flood control, channel maintenance and habitat restoration in the Russian River watershed. The 2025 Russian River Biological Opinion finds that continued restoration of freshwater habitats for listed salmon and steelhead is reliant on the adjustments to existing flow requirements of Decision 1610. It concludes that Sonoma Water continues to petition the State Water Board via interim petitions, changes to Decision 1610 minimum flows during *Normal* and *Dry* hydrologic conditions in a manner consistent with the Reasonable and Prudent Alternative from the 2008 Russian River Biological Opinion. These changes were included in the Proposed Action to avoid potential take of listed salmonids. NMFS determined that these actions will improve water reliability and benefit salmon and steelhead through enhanced cold-water storage resulting in sustained cooler water temperatures during the summer and fall rearing season and greater flexibility to release water to facilitate fish migration.

As with the previous NMFS' 2008 Russian River Biological Opinion, the 2025 Russian River Biological Opinion is only required to petitions for temporary changes to minimum instream flows on the mainstem Russian River, and not on Dry Creek. These petitions do not seek any changes in the Dry Creek minimum-flow requirements adopted in Decision 1610.

To be in accordance with the terms and conditions of the 2025 Russian River Biological Opinion to avoid excessively high flows that could result in violations to the Biological Opinion's Incidental Take Statement, and in response to changed watershed conditions due to recent operational changes of PG&E's PVP, Sonoma Water is filing temporary urgency change petitions (TUCPs) with the SWRCB. The petitions request that the SWRCB make the following changes to Sonoma Water's water rights permits for the period from May 1, 2026, until October 15, 2026: (a) reduce the required minimum instream flow in the Russian River from the confluence of the East and West Forks to the river's confluence with Dry Creek from 185 cfs to 125 cfs; and (b) reduce required minimum instream flow in the Russian River from its confluence with Dry Creek to the Pacific Ocean from 125 cfs to 70 cfs.

Decision 1610 established the minimum instream flow requirements for Dry Creek and the Russian River (see Figure 1). These requirements vary based on defined hydrologic conditions. If approved, the requested reductions in Russian River instream flow requirements will be in effect May 1 through October 15, 2026. To improve its efforts at achieving the optimal habitat conditions in the Lower Russian River and to optimally manage flows in the entire river, Sonoma Water has requested in these TUCPs (as in previous ones) that the minimum instream flow requirement be implemented on a 5-day running average of average daily streamflow measurements with the condition that instantaneous flows on the Upper Russian River be no less than 110 cfs and on the Lower Russian River be no less than 60 cfs. No temporary change in the Dry Creek minimum instream flow requirements is proposed and the minimum instream flow requirement in Dry Creek will remain at 80 cfs during the temporary change period. The proposed temporary changes in Russian River minimum instream flow requirements will not result in any unusual circumstances, because the proposed minimum instream flow requirements are within the range of those that already occur during *Dry* and *Critical* water supply conditions under Decision 1610.

The 2025 Russian River Biological Opinion discusses and supports the use of a hydrologic index based on storage thresholds in Lake Mendocino to establish water supply conditions via interim petitions. Sonoma Water requests these changes in the TUCPs for the period from May 1, 2026, until October 27, 2026.

During the period that the proposed temporary flow changes are in effect, Sonoma Water will also monitor water quality and fish and collect and report information and data related to monitoring activities, to be in accordance with NMFS' 2025 Russian River Biological Opinion.

Lead Agency Approving Project: Sonoma County Water Agency

Lead Agency Contact Name and Phone: Connie Barton 707-547-1905

Applicant: Sonoma County Water Agency

Applicant Contact Name and Phone: Connie Barton 707-547-1905

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)(40 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 Section 15307: Actions by Regulatory Agencies for Protection of Natural Resources; State CEQA Guidelines Section 15308: Actions by Regulatory Agencies for Protection of the Environment; State CEQA Guidelines Section 15301(i): Existing Facilities.
☐ Statutory Exemptions. State Code number:

Reasons why project is exempt:

The project is statutorily exempt under the California Environmental Quality Act (CEQA) Statute 21080(b)(4) and categorically exempt from the California Environmental Quality Act (CEQA) under the State CEQA Guidelines Sections 15307, 15308, and 15301(i).

A. Actions by Regulatory Agencies for Protection of Natural Resources and the Environment

The 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, consequently revising the operations at Lake Pillsbury, and filing 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

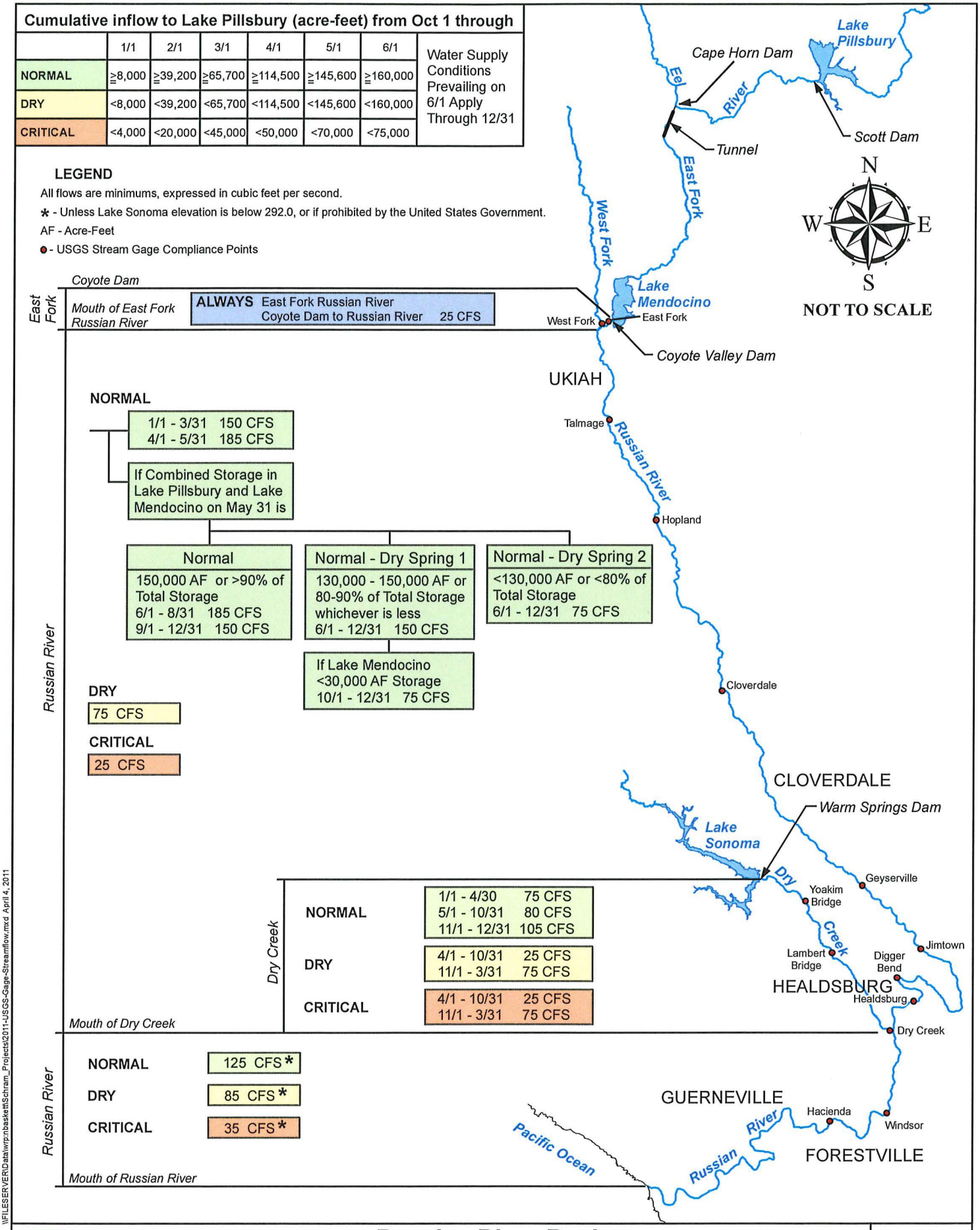
CEQA Guidelines Sections 15307 and 15308 provide that actions taken by regulatory agencies to assure the maintenance, restoration or enhancement of a natural resource and the environment are categorically exempt from CEQA. Sonoma Water is proposing temporary urgency changes to its water right Permits 12947A, 12949, 12950, and 16596 that the State Water 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 and protect listed salmon species. 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 more likely can be sustained with releases from Lake Mendocino and Lake Sonoma without the risk of severely depleting storage and potential harm to natural resources and the environment. These changes avoid potential take of listed salmonids. NMFS determined that these actions will improve water reliability and benefit salmon and steelhead through enhanced cold-water storage resulting in sustained cooler water temperatures during the summer and fall rearing season and greater flexibility to release water to facilitate fish migration.

C. Existing Facilities

Guidelines Section 15301(i) provides, generally, that the operation of existing facilities involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination is categorically exempt from CEQA. Subdivision (i) of Section 15301 specifically includes maintenance of streamflows to protect fish and wildlife resources. Sonoma Water's petition to the State Water Board to change to the minimum instream flow requirements as specified in the 2025 Russian River Biological Opinion does not request and will not expand Sonoma Water's use or increase the water supply available to Sonoma Water for consumptive purposes. The proposed change in Russian River minimum instream flow requirements still will be within the existing operational parameters established by Decision 1610.

Signature	General Manager *Title*	3.19.26 *Date*

☒ Signed by Lead Agency Approving the Project Date received for filing at OPR:_____



Sonoma Water

Russian River Basin Streamflow Requirements

Per State Water Resources Control Board Decision 1610, April 1986

Figure 1