

CSF/ATC
A030049A

Please indicate County where your project is located here:

Lake

MAIL FORM AND ATTACHMENTS TO:
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

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 30049A Permit 20770 License 13527A 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: No Change

Proposed:

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

Present: No Change

Proposed:

Purpose of Use

Present: No Change

Proposed:

Split

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

STATE WATER RESOURCES CONTROL BOARD
 DIVISION OF WATER RIGHTS
 SACRAMENTO
 2016 JUL 22 PM 12:48

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: No Change

Proposed:

REC'D 7-22-2016
 CHECK # 14914 - \$1,192.30
 CHECK # 14913 - \$850.00

GC

Temporary Urgency

This temporary urgency change will be effective from July 15, 2016 to October 31, 2016.

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 July 22, 2016 at Sacramento, California.

Paula Whealen
Right Holder or Authorized Agent Signature
Paula Whealen, Wagner & Bonsignore, Consulting Civil Engineers

Right Holder or Authorized Agent Signature

NOTE: All petitions must be accompanied by:
(1) the form Environmental Information for Petitions, including required attachments, available at: http://www.waterboards.ca.gov/waterrights/publications_forms/forms/docs/pet_info.pdf
(2) Division of Water Rights fee, per the Water Rights Fee Schedule, available at: http://www.waterboards.ca.gov/waterrights/water_issues/programs/fees/
(3) Department of Fish and Wildlife fee of \$850 (Pub. Resources Code, § 10005)

CSF/ATC
A030049B

Please indicate County where your project is located here:

Lake

MAIL FORM AND ATTACHMENTS TO:
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

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 30049B Permit 20770B 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: No Change

Proposed:

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

Present: No Change

Proposed:

Purpose of Use

Present: No Change

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: No Change

Proposed:

GC

REC'D 7-22-2016
CHECK # 14915 - \$1,491.70
CHECK # 14913 - \$850.00

DIVISION OF WATER RIGHTS
 SACRAMENTO
 2016 JUL 22 PM 12:48

Temporary Urgency

This temporary urgency change will be effective from July 15, 2016 to October 31, 2016 .

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 July 22, 2016 at Sacramento, California .

Paula Whealen

Right Holder or Authorized Agent Signature
Paula Whealen, Wagner & Bonsignore, Consulting Civil Engineers

Right Holder or Authorized Agent Signature

NOTE: All petitions must be accompanied by:
(1) the form Environmental Information for Petitions, including required attachments, available at: http://www.waterboards.ca.gov/waterrights/publications_forms/forms/docs/pet_info.pdf
(2) Division of Water Rights fee, per the Water Rights Fee Schedule, available at: http://www.waterboards.ca.gov/waterrights/water_issues/programs/fees/
(3) Department of Fish and Wildlife fee of \$850 (Pub. Resources Code, § 10005)

Hidden Valley Lake Community Services District
Attachment to Petition for Temporary Urgency Change
License 13527A (Application 30049A) and Permit 20770B (Application 30049B)

Hidden Valley Lake Community Services District (District) requests temporary relief from the supplemental discharge term within License 13527A and Permit 20770B. The term requires pumping of groundwater from the District's municipal water supply wells to augment low flows in Putah Creek from July 15 through October 31. The past years of drought have significantly impacted the quantity and quality of the District's groundwater supply. If the State Water Board does not relieve the District of the requirement to make supplemental water discharges into Putah Creek in 2016, the quality of the District's potable water supply will be severely impacted and may not be sufficient to meet the District's minimum health and safety needs. In light of the January 17, 2014 declaration of a drought State of Emergency by Governor Brown, his subsequent April 25, 2014 Emergency Proclamation and Executive Orders B-26-14, B-28-14, B-29-15, B-36-15 and B-37-16, water conservation is particularly important, and suspension of the supplemental discharge term would conserve water necessary to State of California mandates for the shift from Emergency Drought Conditions to, "Water Conservation, It's For Life!".

The ongoing drought conditions will continue to adversely affect the quality of the remaining groundwater water supply, and more specifically, concentrations of hexavalent chromium. The District's drinking water quality monitoring results indicate that there are times, particularly during extended dry periods, when water drawn from the District's wells indicates hexavalent chromium concentrations in excess of the California Department of Public Health's proposed 10 parts per billion Maximum Contaminant Level (MCL) drinking water standard.

In the past, the observed hexavalent chromium concentrations in the District's raw water supply have ranged from 5 to 35 parts per billion, with highest concentrations consistently occurring in the fall, when groundwater elevations are at seasonal lows and the adjacent Putah Creek stream channel is dry. The available data indicate that in the absence or near absence of Putah Creek underflows, the District's groundwater wells obtain a larger fraction of the District's drinking water supply from percolating groundwater that originates from the surrounding serpentine rock/soil dominated drainage basin to the south of Putah Creek (serpentine rock and soil are a significant source of naturally occurring hexavalent chromium). The District anticipates the potential for abnormally high hexavalent chromium concentrations in its raw water supply this summer and fall. Supplemental discharges of groundwater to Putah Creek this summer would increase these hexavalent chromium concentrations. Accordingly, relief from the supplemental discharge condition will minimize the decline of groundwater elevations this summer and provide potentially significant human health and safety benefits.

Background

The District serves municipal water to residential and commercial lots, public golf course, campgrounds, parks and open space in the Hidden Valley Lake Subdivision in Lake County. The District's wastewater treatment plant effluent supplements golf course and park irrigation.

Permit 20770 (Application 30049) was issued by the State Water Board to the District on December 29, 1994. In accordance with the Condition 12 Settlement Agreement in the matter of the Upper Putah Creek Watershed Adjudication and as set forth in State Water Board Order WR 96-002, the District sought a License for water perfected under its Permit as of December 31, 1995. On November 29, 2001 the State Water Board issued License 13527A (Application 30049A) and

Hidden Valley Lake Community Services District
Attachment to Petition for Temporary Urgency Change
License 13527A (Application 30049A) and Permit 20770B (Application 30049B)

Permit 20770B (Application 30049B).

The conditions in Permit 20770 (precursor to License 13527A and Permit 20770B) required the District to prepare a groundwater monitoring plan setting forth a program for construction of a series of dedicated monitoring wells and the collection and reporting of data pertinent to the seasonal groundwater levels within and surface water outflow from the basin. This plan, The Coyote Valley Groundwater Basin Monitoring Plan, was approved by the State Water Board on April 25, 1997. Conditions in License 13527A and Permit 20770B require the implementation of the groundwater monitoring plan. The District is also required to prepare annual reports documenting compliance with the terms and conditions of its License and Permit.

License 13527A authorizes year-round diversion of up to 651 acre-feet annually at a maximum rate of 1.5 cfs for municipal use within Units 1 through 3 and 6 through 11 of Hidden Valley Lake Subdivision (see attached map). The water is diverted from the underflow of Putah Creek at Grange Road Wells 4, 2, and 3 located at Points of Diversion 1, 2 and 3, respectively. (Grange Road Well 4 was constructed at Point of Diversion 1 adjacent to Grange Road Well 1 after Grange Road Well 1 failed and was removed from service in 2002.)

Permit 20770B authorizes year-round diversion of up to 1,649 acre-feet annually at a maximum rate of 4.4 cfs. In addition to the Points of Diversion named in License 13527A, Permit 20770B also authorizes diversion at Points of Diversion 4 and 5. As yet, there is no diversion facility at Point of Diversion 4, but a new well is planned for construction. The Agricultural Well (Ag Well) is used to divert water at Point of Diversion 5. Permit 20770B authorizes municipal use within the same place of use that is named in License 13527A, as well as use for fish and wildlife preservation purposes within the Putah Creek corridor and municipal use at the wastewater treatment plant.

When License 13527A and Permit 20770B were issued in 2001, it was generally believed that the District's extractions from the Coyote Valley groundwater basin could have a measurable impact on groundwater elevations in the vicinity of Putah Creek, and more specifically, the magnitude and duration of summer and fall surface stream flows downstream of the former USGS gaging station site on Putah Creek at Guenoc. During the summer and fall, the surface stream flow of Putah Creek in the vicinity of the USGS gage is derived from subsurface accretions ("rising" groundwater). Accordingly, the term that mandates supplemental stream flow releases, and the term that requires the District to implement the 1997 groundwater monitoring plan, were incorporated into License 13527A and Permit 20770B as mitigation and on-going monitoring measures in the event that the District's water diversions did in fact adversely impact subsurface accretions.

Groundwater elevation data compiled by the District and others since 1997, as well as riparian habitat surveys conducted on behalf of the District since 2007, indicate that there has been no measurable impact to subsurface accretions or degradation of riparian vegetation as a result of the District's water diversions. The District's monitoring data indicate that the supplemental stream flow releases may be detrimental to the aquatic biota of Putah Creek by creating an artificially cool and more frequently wetted stream environment between the supplemental water discharge point and the Guenoc gage instead of the naturally warmer intermittent stream conditions. The artificial

Hidden Valley Lake Community Services District
Attachment to Petition for Temporary Urgency Change
License 13527A (Application 30049A) and Permit 20770B (Application 30049B)

condition may support a largely non-native fishery as well as invasive species. Artificially maintaining a non-native fishery is generally contrary to sound ecological principles and practices.

Annual groundwater monitoring reports have demonstrated no long-term effect on groundwater levels in the Coyote Valley groundwater basin due to the extraction of water from the four wells operated by the District. As documented in the District's annual monitoring reports, monthly groundwater levels fully recover each winter (during periods of normal rainfall). Historically, fluctuations corresponding to seasonal precipitation have been observed, but groundwater levels have not shown a downward trend.

In January 2013, the District filed Petitions for Change, currently pending approval, requesting permanent removal of the supplemental discharge and groundwater monitoring term from License 13527A and Permit 20770B. To comply with the supplemental discharge requirement in 2013, the District pumped 430 acre-feet to Putah Creek, roughly 27% of the District's annual diversion. Due to the ongoing drought, the State Water Board issued a curtailment of post-1914 appropriative water rights in 2014 and 2015 within the Putah Creek Watershed. Accordingly, the District did not provide supplemental groundwater discharges to Putah Creek those years in order to preserve its supply to meet the health and safety needs of the District.

The District is requesting that the supplemental discharge requirement within License 13527A and Permit 20770B be suspended during the upcoming discharge period in 2016 as conditions remain critical and have not improved adequately to allow for the District to maintain a suitable groundwater supply to meet the needs of its residents while pumping supplemental water into Putah Creek with no observed benefit, and possibly a detriment to the environment. Furthermore, as stated in the May 2016 executive order (Executive Order B-37-16) signed by Governor Brown, dry conditions are expected to continue into next year in many areas of the state, and ongoing drought conditions require California to adopt permanent changes to use water more wisely and to prepare for more frequent and persistent periods of limited water supply. Suspending the supplemental discharge requirement would allow for wiser use of water, especially considering the documented lack of benefit from discharging water and creating an unnatural condition that has been observed in the course of habitat studies to support non-native species downstream of the supplemental discharge location.

Requested Temporary Relief of License and Permit Terms

This Petition for Temporary Urgency Change seeks relief from the term within License 13527A and Permit 20770B that requires the District to pump groundwater into Putah Creek. The requested temporary change would be effective July 15, 2016 through October 31, 2016, the period named in the supplemental discharge term within License 13527A and Permit 20770B.

Following is the term from which the District is seeking temporary relief, which term was included for the purpose of protecting biological resources located downstream of the U.S.G.S. stream gage:

Licensee/Permittee shall provide supplemental water downstream from the points of diversion to augment low flows in Putah Creek. Said supplemental water shall be introduced at a point on Putah Creek located approximately North 406,600 feet and East 1,848,100 feet, California Coordinate System, Zone 2, being within the NW ¼ of the NW

Hidden Valley Lake Community Services District
Attachment to Petition for Temporary Urgency Change
License 13527A (Application 30049A) and Permit 20770B (Application 30049B)

¼ of projected Section 28, T11N, R6W, MDB&M, as shown on the map entitled "Hidden Valley Lake Community Services District – Supplemental Water Release Location." The point of supplemental water discharge may be changed upon written approval of the Chief, Division of Water Rights.

For the period July 15 to October 31 of each year, licensee/permittee shall make-up the difference between actual discharge, as measured at the site of the former Guenoc USGS gaging station on Putah Creek at Guenoc as shown on the 1958 USGS 7.5 minute series quadrangle map for Middletown, California and the median daily discharge listed below:

Median Daily Discharge for Putah Creek at Guenoc, 1954-1975, (all amounts in cfs)

<i>July</i>	<i>August</i>	<i>September</i>	<i>October</i>
<i>4.7</i>	<i>1.7</i>	<i>0.9</i>	<i>0.6</i>

Licensee/Permittee shall not be required to provide supplemental water at a rate greater than two cubic feet per second.

Licensee/Permittee shall maintain a measuring device, acceptable to the Chief of the Division of Water Rights, which is capable of measuring both the instantaneous rate and the total amounts of supplemental water discharged to Putah Creek.

Current Diversion and Groundwater Conditions

The District provides potable water to residents from three wells, Grange Road Wells 2, 3, and 4. The Agricultural Well (Ag Well), which draws from the same basin as the Grange Road Wells, is used to provide some of the non-potable water for outdoor municipal uses within the District, such as golf course irrigation. In order to meet the July 15 through October 31 supplemental discharge requirement, the Ag Well and one of the three Grange Road Wells must often be operated simultaneously at a combined rate of two cubic feet per second. Consequently, by the end of October, well levels are at or near the lowest levels of the year. In a typical year, the well levels fully recover from groundwater recharge as a result of precipitation during the winter and spring. In spite of the fact that no water was pumped into Putah Creek in 2015 and ongoing conservation by the District, due to below average precipitation, the groundwater elevation of the District's wells have only recovered to roughly average levels. If the supplemental discharge requirement is not suspended in 2016, the Grange Road Wells may not be able to produce adequate supply to meet the potable water needs of the community when below average precipitation persists through early 2017, which is a stated concern in Executive Order B-37-16, signed by Governor Brown on May 9, 2016.

California Environmental Quality Act

The District is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA) for this Petition. The District's Notice of Exemption pursuant to CEQA is attached as Exhibit 1.

Hidden Valley Lake Community Services District
Attachment to Petition for Temporary Urgency Change
License 13527A (Application 30049A) and Permit 20770B (Application 30049B)

Findings

Pursuant to Water Code Section 1435, any permittee or licensee who has an urgent need to make a change in its permit or license may petition for a conditional, temporary change order. The State Water Board must make the following findings in order to grant such a petition:

- (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, including findings to support change order conditions imposed to ensure that the change is in the public interest, and may be made without injury to any other lawful user of the water, and without unreasonable effect upon fish, wildlife, and other instream beneficial uses.

The District offers the following to demonstrate compliance with the four findings:

(1) Urgent Need for Change

The District has an urgent need to temporarily suspend the supplemental discharge requirement in License 13527A and Permit 20770B in order to maintain its municipal water supply so that there will be sufficient water to meet essential health and safety needs should the drought persist. On January 17, 2014 Governor Brown declared a drought State of Emergency, followed by his subsequent April 25, 2014 Emergency Proclamation and Executive Orders B-26-14, B-28-14, B-29-15, B-36-15 and B-37-16, which modify but do not repeal the drought declaration. There have now been six consecutive years (including the 2016 water year) during which the amount of precipitation has been below the historical average.

The three Grange Road wells are the District's sole source of potable water. If the District is required to pump groundwater into Putah Creek during 2016, assuming the July through October change in water levels is similar to previous years and assuming minimal precipitation in the upcoming winter and spring, the water surface elevations will fall to dangerously low levels, similar to the historically low levels of 2014. The ability of the well pumps to draw water is diminished as the depth to water increases. With extremely low water surface elevations, the pumps at the three Grange Road Wells may not be capable of producing adequate supply to meet the health and safety needs of the District's residents. Pumping additional water into Putah Creek will jeopardize the District's only source of potable water.

The community of Hidden Valley Lake, served by the District, was also heavily impacted by the Valley Fire, a large wildfire that burned for more than 30 days during September and October 2015. The wildfire burned more than 76,000 acres, including parts of the Hidden Valley Lake service area containing residential and other structures. As a result of the fire, the District has experienced a loss of revenue and incurred additional costs associated with repairing damaged infrastructure, which has created a financial hardship for the District. The District lost over \$15,000 in revenue in the 2015-2016 fiscal year due to the fire. This does not include the amount required for repairing the infrastructure. The additional cost of pumping groundwater into Putah

Hidden Valley Lake Community Services District
Attachment to Petition for Temporary Urgency Change
License 13527A (Application 30049A) and Permit 20770B (Application 30049B)

Creek would add to the financial strain on the District while providing no benefit to downstream habitat. The supplemental discharge program costs the District upwards of \$25,000 per year.

(2) No Injury to Lawful User of Water

No downstream diverters of record would be injured by this requested change. The requirement to discharge supplemental water into Putah Creek was introduced in an effort to address potential impacts from the District's well operations to riparian habitat downstream of the United States Geological Survey stream gage on Putah Creek near Guenoc. The groundwater that has been discharged into Putah Creek was never intended to be a source of water for downstream diverters. Since the groundwater discharge is not part of the natural stream flow, riparian diverters do not have a legal claim of right to divert it, and the District is not required to supply such water for use by downstream appropriative diverters.

(3) No Unreasonable Effect to Fish, Wildlife, or Other Instream Beneficial Uses

Aquatic habitat assessments prepared for the District, the results of which are included as part of the annual Coyote Valley Groundwater Basin Monitoring Report prepared by the District each year, indicate that the supplemental stream flow releases may be detrimental to the aquatic biota of Putah Creek by creating an artificially cool and more frequently wetted stream environment between the supplemental water discharge point and the Guenoc gage instead of the naturally warmer intermittent stream conditions. The artificial condition may support a largely non-native fishery as well as invasive species, such as bullfrogs. Mike Podlech, aquatic ecologist, has noted in his October 2014 Putah Creek Aquatic Habitat Assessment (Exhibit 2) that recent dry conditions may have helped suppress the non-native bullfrog population. Artificially maintaining a non-native fishery and predatory non-native wildlife is generally contrary to sound ecological principles and practices. Therefore, there would be no unreasonable effect to fish, wildlife or other instream uses. The effect of suspending (or discontinuing) the supplemental discharge requirement would, in fact (based on available evidence), be beneficial to native species in the vicinity of the discharge point.

In his October 2014 assessment report, Mr. Podlech states that the supplemental water discharged by the District would have the effect of artificially creating "normal" water year conditions within the assessment reach during "below normal" water years. He states, "Non-native bullfrogs, a voracious predator of foothill yellow-legged frogs and other native amphibians, have routinely been observed in the pool containing the USGS gage and other areas of the assessment reach. Periodic natural drying of the assessment reach may help suppress local bullfrog populations through elimination of some tadpoles." Mr. Podlech's reports suggest that the supplemental water program may be ecologically detrimental, given that it maintains an unnatural condition that supports a largely non-native fishery and invasive bullfrogs. Because no supplemental water was delivered in 2014, natural dry conditions were allowed to develop in the stream below the supplemental discharge point for the first time in several years, yet Mr. Podlech still observed that surface water was present in the channel from the pool containing the USGS gage downstream to the end of the assessment reach.

Hidden Valley Lake Community Services District
 Attachment to Petition for Temporary Urgency Change
 License 13527A (Application 30049A) and Permit 20770B (Application 30049B)

It was believed that a July 2015 habitat assessment would yield little in the way of new information, so it was not conducted. The October 2015 assessment was cancelled due to wildfire activity in the area.

The District will continue its groundwater well monitoring program for 2016 and will issue the required annual report to the State Water Board at the end of 2016.

(4) Proposed Change is in the Public Interest

The proposed change is in the public interest. The District is a member of the California Urban Water Management Conservation Council and employs an aggressive water conservation program. Between 2007 and 2015 District per capita consumption dropped from 121 to 88 gallons per person per day. Current per capita consumption is already below the relevant 2020 conservation targets set forth by the State's February 2010 20x2020 Water Conservation Plan (North Coast, 137 gallons per person per day; Sacramento River, 176 gallons per person per day). In February 2014 the District, in accordance with the Governor's call for 20 percent voluntary conservation, adopted Resolution 2014-2 echoing the Governor and urging District constituents to voluntarily reduce water consumption by 20 percent. The District residents continue to be restricted to no more than two days of outdoor watering per week.

Fiscal Year	Number of Residential Service Connections	"Winter" (Oct-Mar) Per Capita Consumption (gallons/person/day)	"Summer" (Apr-Sep) Per Capita Consumption (gallons/person/day)	Annual (Jan-Dec) Per Capita Consumption (gallons/person/day)
2007	2,329	100	151	125
2008	2,299	98	148	123
2009	2,258	99	132	115
2010	2,275	92	112	102
2011	2,302	86	112	99
2012	2,324	87	111	99
2013	2,341	85	124	104
2014	2,423	78	115	99
2015	2,428	62	103	88

Even with conservation, another year of below-average precipitation would create a more severe water shortage that could threaten the health and safety of the District's residents. Therefore, further conserving the supply of District water by suspending the supplemental discharge requirement as proposed by this Petition is necessary.