CITY COUNCIL AGENDA REPORT

DATE: MARCH 2, 2020

TO: CITY COUNCIL

FROM: MARY ROSE RUTIKANGA, CITY ADMINISTRATOR

SUBJECT: LETTER IN SUPPORT OF TUD'S SPRING GAP DRAFT PINECREST LAKE LEVEL AMENDMENT

RECOMMENDATION:

Approve and authorize the Mayor to sign a letter to the State Water Resources Control Board (SWRCB) in support of Tuolumne Utilities District's (TUD) Spring Gap Draft Pinecrest Lake Level Amendment.

DISCUSSION:

TUD is requesting the City of Sonora's support to amend the State Water Resources Control Board's (SWRCB) proposed minimum lake level requirement at Pinecrest Lake. TUD believes that SWRCB's current draft amendment to does not protect Tuolumne County's water supply and jeopardizes the public water supply of thousands of people in the County during the most critically dry years.

Staff recommends the Council approve and authorize the Mayor to sign the letter in support of TUD's Spring Gap Draft Pinecrest Lake Level Amendment to ensure the water supply for the people of Tuolumne County is maintained at adequate levels.

FISCAL IMPACT:

There is no cost general fund of the City to sign a letter in support of TUD's Spring Gap Draft Pinecrest Lake Level Amendment.

Attachments:

1. Letter to SWRCB in support of TUD's Spring Gap Draft Pinecrest Lake Level Amendment

2. Draft Water Quality Certification Amendment Related to Pinecrest Lake Levels

City of Sonora
"Queen of the Southern Mines"
94 N. Washington Street
Sonora, CA 95370

Area Code 209
Administrator.....532-6115
Administration.....532-4541
Finance.....532-6331
Building/Planning.....532-3508
Police 532-8143
Fire.....532-7432
Public Works.....532-2922
Cemetery 532-4492
Opera Hall.....532-7725
Special Programs.....532-7725
Redevelopment 532-7725
www.sonoraca.com

March 2, 2020

Mr. Allan Laca
State Water Resources Control Board
Division of Water Rights – Water Quality Certification Program
P.O. Box 2000
Sacramento, CA 95812-2000

Via First Class Mail and email to: WR401Program@waterboards.ca.gov

RE: Support for Tuolumne Utilities District's Spring Gap-Stanislaus Project Draft Pinecrest Lake Level Amendment

Dear Mr. Laca:

The City of Sonora is submitting this letter in support of Tuolumne Utilities District's (TUD) request to amend the State Water Resources Control Board's proposed minimum lake level requirement at Pinecrest Lake.

We agree with TUD's statement that the end of spill is the best, most accurate, and most objective of all criteria to establish the minimum lake level on Labor Day at Pinecrest Lake. However, the SWRCB's draft amendment does not go far enough to protect this County's water supply as it only provides for a minimum lake level of 5,603' during years when end of spill occurs between June 18 and June 24. This jeopardizes the public water supply of thousands of people in this County during the most critically dry years and is unacceptable. We agree with TUD that the SWRCB should modify the draft amendment to allow the lake to be dropped to as low as 5,602' when end of spill occurs between June 1 and June 17.

The City of Sonora urges the SWRCB to accept the request of Tuolumne Utilities District in order to protect this County's public water supply.

Thank you for your consideration.

Sincerely,

Jim Garaventa,
Mayor, City of Sonora

State Water Resources Control Board

PUBLIC COMMENT PERIOD FOR DRAFT WATER QUALITY CERTIFICATION AMENDMENT RELATED TO PINECREST LAKE LEVELS

PACIFIC GAS AND ELECTRIC COMPANY'S SPRING GAP-STANISLAUS HYDROELECTRIC PROJECT FEDERAL ENERGY REGULATORY COMMISSION PROJECT NO. 2130

To: Interested Parties Mailing List

Pacific Gas and Electric Company (PG&E) filed a request with the State Water Resources Control Board (State Water Board) to modify the Labor Day minimum lake level requirement at Pinecrest Lake. The request is pursuant to Condition 4 of the Clean Water Act Section 401 water quality certification (certification) issued by the State Water Board under Order WR 2009-0039 for the Spring Gap-Stanislaus Hydroelectric Project (Project), Federal Energy Regulatory Commission Project No. 2130.

Background

PG&E owns and operates the Project, which is located on the Middle and South Forks of the Stanislaus River in Tuolumne County, California. On September 15, 2008, the State Water Board issued a certification for the Project. On October 14, 2008, Tuolumne Utilities District (TUD[1]) and PG&E filed petitions for reconsideration of the certification based primarily on the Labor Day minimum lake level requirement of 5,610 feet established for Pinecrest Lake. PG&E has a contractual obligation to deliver water to TUD from Lyons Reservoir (part of the Phoenix Hydroelectric Project, FERC Project No. 1061) (Phoenix Project) and Pinecrest Lake (under this Project). On June 16, 2009, the State Water Board amended the certification to lower the Labor Day minimum lake level requirement at Pinecrest Lake from 5,610 feet to 5,608 feet to allow PG&E more flexibility to make contracted water deliveries to TUD. The certification also included an opportunity for PG&E to request a lower Labor Day minimum lake level at Pinecrest Lake after PG&E completed a Lake Level Study analyzing various lake levels lower than 5,608 feet and the resulting effects on recreational beneficial uses.

[1] In 1983, Tuolumne County purchased a water delivery system from PG&E and created TUD. The purchase contract included provisions for PG&E to deliver water to TUD in perpetuity from PG&E's water in Lyons Reservoir and Pinecrest Lake. Ninety-five percent of TUD's water supply is based on this contract. For more information about TUD's water supply, see TUD's website (https://tudwater.com/).

Pursuant to Condition 4 of the certification, PG&E submitted a Lake Level Study Report to the State Water Board in April 2011. On December 16, 2011, PG&E submitted a request to modify the Labor Day minimum lake level requirement at Pinecrest Lake, which also included a mitigation plan to address the impacts to recreation due to lower lake levels. On March 16, 2015, the State Water Board, as the California Environmental Quality Act (CEQA) lead agency, released a draft *Pinecrest Lake Level Modification Project Initial Study and Mitigated Negative Declaration* (Lake Level IS-MND) for public comment. The State Water Board received 124 comment letters.

Overview of State Water Board Staff's Proposal

During the summer, the amount of available water in Pinecrest Lake is primarily dependent on two factors: End of Spill date and PG&E's Labor Day lake level requirement. The End of Spill is defined as the date Pinecrest Lake level falls below 5,617 feet and PG&E begins to make releases from stored water. PG&E's obligations include Project minimum instream flow (MIF) requirements, Phoenix Project MIF requirements, and PG&E's contractual obligations to TUD. An earlier End of Spill date increases the period of time that PG&E must meet its obligations with the stored water available in Lyons Reservoir and Pinecrest Lake.

There is a general correlation between the End of Spill date and TUD's request for supplemental supply water from Pinecrest Lake. Based on this correlation, staff determined that use of the End of Spill date (instead of water year type) is the most appropriate trigger for establishment of minimum Pinecrest Lake levels on Labor Day.

In evaluating PG&E's request, staff considered the Lake Level Study Report on which the request was based, the *Lake Level IS-MND*, public comments, information provided by TUD and other interested parties, and other available information.

To assess the Pinecrest Labor Day Lake levels requested by PG&E, State Water Board staff quantified the amount of water available in Lyons Reservoir and Pinecrest Lake associated with varying End of Spill dates and Labor Day lake levels. Staff also assessed the volume of water necessary to meet the MIF requirements of the Project and the Phoenix Project, as well as TUD water supply needs. On December 22, 2017, at the request of staff, TUD submitted a Raw Water Supply – Water Balance Technical Memorandum (Water Balance TM). The Water Balance TM contained information regarding TUD's delivery system, as well as gage data. Staff collected information on diversions and other factors that reduce the volume of water available at Lyons Reservoir and Pinecrest Lake. Staff used all the information to perform a Pinecrest Lake-Lyons Reservoir Supply-Demand Analysis (Supply-Demand Analysis). The Supply-Demand Analysis includes a contingency for unknown evaporation/infiltration losses, a projected growth rate through the end of the FERC license term in 2047, and assumes limited water conservation.

The proposed minimum Pinecrest Lake levels on Labor Day are based on TUD's reported water demand between 2009 and 2013 (years prior to the recent drought in which water use levels were influenced significantly by external factors including mandatory water conservation).

The proposed certification amendment also includes measures that must be implemented before the lower Pinecrest Lake levels may be implemented. These measures are based on PG&E's request, the Lake Level Study Report, and the *Lake Level IS-MND*.

Staff's proposed minimum Pinecrest Lake levels on Labor Day are shown as amendments to Condition 4 and Condition 5 of the certification (see attachment).

Public Review Period:

The State Water Board is accepting comments on the draft certification amendment. The comment period is from the date of this notice until March 12, 2020. **Comments must be received by 12:00 pm (noon) on Friday, March 12, 2020.** Comments can be submitted electronically or by mail to:

Email: WR401Program@waterboards.ca.gov

or

Allan Laca
State Water Resources Control Board
Division of Water Rights – Water Quality Certification Program
P.O. Box 2000
Sacramento, CA 95812-2000

In the subject line of your comments, please indicate "Spring Gap-Stanislaus Project Draft Pinecrest Lake Level Amendment." When submitting public comments, only comments submitted in an accessible format (i.e., those that are in compliance with the Web Content Accessibility Guidelines 2.0, or subsequent version, published by the Web Accessibility Initiative of the World Wide Web Consortium at a minimum Level AA success criteria) will be posted to the State Water Board's website. All timely comments will be considered by the State Water Board.

KEEP INFORMED OF PROJECT MILESTONES

To receive emails related to the Project and other projects pursuing certifications managed by the Division of Water Rights, interested persons should enroll in the "Water Rights Water Quality Certification" e-mail notification service. Instructions on how to sign up for the State Water Board's Email Subscription List are outlined below:

1. Visit the State Water Board's **Email Subscription List webpage** at: http://www.waterboards.ca.gov/resources/email_subscriptions/swrcb_subscribe.shtml#rights
2. Provide your name and email in the required fields.
3. In the categories below the email and name fields, select "Water Rights," then "Water Rights Water Quality Certification."
4. Click the "Subscribe" button.
5. An email will be sent to you. You must respond to the email message to confirm your membership on the selected list(s).

By enrolling in this email list, you will receive notices for current projects in the Division of Water Rights' Water Quality Certification Program, including the Spring Gap-Stanislaus Hydroelectric Project. If you do not have internet access or do not wish to participate in the email subscription list, you may contact Mr. Allan Laca at the phone number listed below to request to receive notices by mail. You can enroll or un-enroll from the email subscription service at any time.

If you have questions regarding this notice, please contact Mr. Allan Laca by email at WR401Program@waterboards.ca.gov or by phone at (916) 322-8469.

Ann Marie Ore — Date: 1/28/2020

Ann Marie Ore
Water Quality Certification Program Manager
Division of Water Rights

Attachment: Draft Spring Gap-Stanislaus Hydroelectric Project Water Quality Certification Amendment

DRAFT
Spring Gap-Stanislaus Hydroelectric Project
Water Quality Certification Amendment,
Federal Energy Regulatory Commission Project No. 2130

State Water Resources Control Board (State Water Board) staff proposes the following amendments to the water quality certification (certification) for Pacific Gas and Electric Company's (Licensee) Spring Gap-Stanislaus Hydroelectric Project (Project). Text from the June 16, 2009 certification (**Order WR 2009-0039**[1]), which was incorporated into the January 13, 2010 Federal Energy Regulatory Commission (FERC) license, is shown in *italicized* text. Proposed deletions are shown in ~~strike out~~. Proposed additions are shown in **bold**, *italicized*, and underlined text.

Modify text on pages 19-21 of Order WR 2009-0039, as follows:

4. *The Licensee shall maintain the minimum streamflow schedule for the Pinecrest Reach between Strawberry Dam and the Philadelphia Diversion and in the Philadelphia Reach below the Philadelphia Diversion Dam in the SFSR, as specified in the following tables. In addition, the Licensee shall maintain a year-round minimum streamflow of 5 cfs in SFSR below Strawberry Dam. ~~In years when Pinecrest Reservoir cannot be maintained above target elevation 5,608 feet, water releases during the period from the End of Spill through Labor Day shall only be made to meet the minimum streamflow schedule and Spring Gap Powerhouse Demand.~~* ***Each year immediately after the End of Spill has occurred, the*** *Licensee shall draw down Pinecrest* ***Lake*** *~~Reservoir~~ to ~~reach~~ a**n** ~~target~~ elevation of 5,615 feet as early as reasonably feasible ~~each year after the End of Spill~~, provided ~~that~~**the** minimum streamflow schedule**,** ~~and~~ Spring Gap Powerhouse Demand ~~can be met~~, and ***minimum Labor Day*** *Pinecrest* ***Lake levels*** *~~Reservoir~~* ***(outlined below) can be met.*** *~~elevation can be maintained above a target elevation of 5,608 feet prior to and including Labor Day.~~*

*End of Spill is when the reservoir elevation falls below elevation 5,617 feet and the inflow to Pinecrest Lake decreases so that the diurnal fluctuation does not cause the ~~water surface elevation~~**lake level** to exceed elevation 5,617 feet and the outlet valve is used by the Licensee to control water releases from Strawberry Dam.*

Spring Gap Powerhouse Demand
During the period from the end of spill at Strawberry Dam until Labor Day, diversion of water to the Philadelphia Canal shall be a maximum flow of 6 cfs (the maximum flow is the mean flow over a continuous 24-hour period; the instantaneous streamflow may, on an infrequent basis, exceed the specified maximum flow by up to 1 cfs), except:

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[1] *Order WR 2009-0039 is available online at: https://www.waterboards.ca.gov/waterrights/board_decisions/adopted_orders/orders/2009/wro2009_0039.pdf*

a. *During transmission line outages that require Spring Gap Powerhouse to govern local electric system load, or for Spring Gap Powerhouse maintenance, including start-up testing. Licensee shall use the minimum flow amount necessary to meet local load requirements or start-up testing procedures.*
b. *When excess storage is available in Pinecrest Reservoir above that needed to meet the minimum stream flow schedule and maintain a reservoir elevation above* ***the minimum Labor Day Pinecrest Lake levels*** ~~*target elevation 5,608 feet prior to and including Labor Day*~~*.*
c. *When flow is available from Herring Creek above that needed to meet the minimum streamflow schedule.*

Minimum streamflow schedule for the Pinecrest Reach (cfs) [1, 2]

Month	***Dry Water Year***	***Normal-Dry Water Year***	***Normal-Wet Water Year***	***Wet Water Year***
October 1-31	*10*	*10*	*15*	*15*
November 1-30	*10*	*10*	*15*	*15*
December 1-31	*10*	*10*	*10*	*15*
January 1 – February 9	*10*	*10*	*10*	*15*
February 10 – March 9	*10*	*10*	*10*	*15*
March 10 - April 9	*10*	*10*	*10*	*15*
April 10 - May 9	*10*	*10*	*15*	*15*
May 10 – May 31	*10*	*10*	*15*	*15*
June 1 – 30	*10*	*10*	*15*	*15*
July 1- 31	*10*	*10*	*15*	*15*
August 1 – 31	*10*	*10*	*15*	*15*
September 1 – 30	*10*	*10*	*15*	*15*

[1] *The compliance location for the minimum streamflows shall be USGS gage 11296500 (PG&E gage S-61) on the SFSR below Herring Creek.*
[2] *Once Pinecrest Lake has reached the specified minimum storage of 500 acre-feet, the minimum required streamflow is the amount indicated, or the inflow to Pinecrest Lake plus accretion flows from Herring Creek, whichever is less.*

Minimum streamflow schedule for the Philadelphia Reach (cfs) [1, 2]

Month	Dry Water Year	Normal-Dry Water Year	Normal-Wet Water Year	Wet Water Year
October 1-31	10	10	15	15
November 1-30	10	10	15	15
December 1-31	10	10	10	15
January 1 – February 9	10	10	10	15
January 1 – February 9	10	10	10	15
March 10 - April 9	10	10	10	15
April 10 - May 9	10	10	15	15
May 10 – May 31	10	10	15	15
June 1 – 30	10	10	15	15
July 1- 31	10	10	15	15
August 1 – 31	10	10	15	15
September 1 – 30	10	10	15	15

[1] The compliance location for the minimum streamflows shall be USGS gage 11297200 (PG&E gage S-83) below Philadelphia Diversion.
[2] Once Pinecrest Lake has reached the specified minimum storage of 500 acre-feet, the minimum required streamflow is the amount indicated, or the inflow to Pinecrest Lake plus accretion flows between Strawberry Dam and Philadelphia Diversion, whichever is less.

The Licensee shall, within one year of license issuance, develop and file a plan for monitoring compliance with the 5 cfs minimum streamflow requirement below Strawberry Dam for approval by the Deputy Director. The specified minimum streamflow schedule in this condition is the mean flow over a continuous 24-hour period. Instantaneous streamflow may, on an infrequent basis, deviate below the specified minimum streamflow by up to 10 percent. However, the Licensee shall make a good faith effort to meet the specified minimum streamflows at all times.

Pinecrest Lake

Pinecrest ~~Reservoir~~ ***Lake*** shall not be drawn down below 500 acre-feet (af), except after approval of the Deputy Director. From Labor Day to December 31, regulated streamflows in the Philadelphia Reach shall not be greater than 60 cfs.

No later than April 15 of each year, the Licensee shall ~~develop and~~ submit a Pinecrest Lake drawdown curve to USFS, DFG, ~~and Tuolumne Utilities District~~ ***TUD***, State Water Board, and others that request such information. ***At a minimum, the drawdown curve shall include the following:***

- ***Forecasted End of Spill date;***

- *Current water year determination (Condition 1);*
- *Evaporation loss rates assumptions;*
- *Monthly flow rates forecasted at gages S-61 (USGS gage 11296500), S-9 (USGS gage 11297000), and S-83 (USGS gage 11297200);*
- *Schedule of any planned transmission line outages that require the Spring Gap Powerhouse to govern local electricity system load and the anticipated minimum flow rates necessary;*
- *Schedule of any planned maintenance activities at the Spring Gap Powerhouse that require start-up testing procedures and the anticipated minimum flow rates necessary;*
- *Forecasted Labor Day Pinecrest Lake level; and*
- *Forecasted Columbus Day Pinecrest Lake level.*

Within 15 days of the End of Spill date each year, the Licensee shall submit a revised drawdown curve to USFS, DFG, TUD, State Water Board, and others that request such information. The revised drawdown curve shall include the following:

- *Actual End of Spill date;*
- *Updated evaporation loss rate assumptions, if applicable;*
- *Updated monthly flow rates forecasted at gage S-61, S-9, and S-83, as applicable;*
- *Revised forecasted Labor Day Pinecrest Lake level, if applicable; and*
- *Revised forecasted Columbus Day Pinecrest Lake level, if applicable.*

Within 15 days after Labor Day of each year, the Licensee shall submit to USFS, DFG, TUD, State Water Board, and other that request such information the actual Labor Day Pinecrest Lake level and a revised forecasted Columbus Day Pinecrest Lake level, if applicable.

The Licensee shall provide telemetered flow data for gages S-61 (USGS gage 11296500), S-9 (USGS gage 11297000), and S-83 (USGS gage 11297200) via a public website that, at a minimum, displays daily flow data and is updated weekly. The data shall be provided to the State Water Board upon the request of the Deputy Director in a format retrievable and viewable using Microsoft Excel, Microsoft Access, or other software program authorized by the Deputy Director.

Unless approved by the Deputy Director in accordance with Condition 5, the Licensee shall not implement Labor Day Pinecrest Lake levels below 5,608 feet until the Licensee's implementation of the Pinecrest Lake Plan (see Condition 4.A) has been approved by the Deputy Director. Following Deputy

Director approval of Pinecrest Lake Plan implementation, the minimum Labor Day Pinecrest Lake levels shall be determined by the End of Spill date outlined in the following table:

Minimum Labor Day Pinecrest Lake Level

End of Spill Date	***Minimum Labor Day Pinecrest Lake Level[1] (feet)***
July 15 or later	***5,608***
July 1 – 14	***5,606***
June 25 – 30	***5,605***
June 18[2] – 24	***5,603***

[1] Minimum lake level includes Labor Day.
[2] If End of Spill occurs prior to June 18, refer to Condition 5.

~~*Within nine months of license issuance the Licensee shall submit a Pinecrest Reservoir minimum lake level study plan (Lake level Study), developed in consultation with the USFS, DFG, State Water Board staff, and TUD, to the Deputy Director for modification and approval that will determine the minimum Pinecrest Reservoir elevation between End of Spill through Labor Day that protects recreational uses (specifically, Day Use Area beaches, the marina to just east of the handicap fishing access, and other areas as directed by the State Water Board). Licensee shall complete the Lake level Study as approved by the Deputy Director by the end of the first full calendar year after license issuance. The completed study shall be provided to the USFS, DFG, State Water Board staff, and TUD for review and comment. By March 1 of the year following completion of the Lake level Study, the Licensee shall submit to the Deputy Director for approval the completed study, including any comments received.*~~

~~*Within six months of approval of the Lake level Study by the Deputy Director, Licensee may request the State Water Board modify the target elevation of 5,608 foot based on the results of the Lake level Study, after the State Water Board provides notice to affected parties.*~~

4.A. No later than one year following issuance of the FERC license amendment, the Licensee shall submit a Pinecrest Lake Plan to the Deputy Director for review and approval. The Deputy Director may require modifications as part of any approval. The Pinecrest Lake Plan shall be developed in consultation with representatives from USFS, DFG[2], Pinecrest Lake Resort, Pinecrest

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[2] Effective January 1, 2013, DFG was renamed the California Department of Fish and Wildlife.

Permittees Association, and the State Water Board. The Pinecrest Lake Plan shall describe how the Licensee will address substrate improvement, buoy line modification, and communications prior to implementing the lake levels outlined in the Minimum Labor Day Pinecrest Lake Level table. At a minimum the Pinecrest Lake Plan shall include the following elements related to substrate improvement, buoy line modification, and public communications:

Substrate Improvements
The substrate improvements portion of the plan shall include:

a. *Description of goals and objectives associated with substrate improvement activities;*

b. *Description of activities to improve the quality and safety of recreation at Pinecrest Lake due to lower lake levels prior to Labor Day, which shall include but not limited to:*

   i) *Rock removal;*

   ii) *Stump removal; and*

   iii) *Improvements to mud flats;*

c. *List of necessary permits;*

d. *Proposed measures to protect water quality and beneficial uses during construction, which includes, at a minimum:*

   i) *A Spill Prevention and Containment Plan for all equipment used during construction; and*

   ii) *An Erosion and Sediment Control Plan that includes:*

      - *Scheduling of sediment modification work in a manner to minimize any potential sediment discharges; and*
      - *Sediment control measures that would reduce sediment discharges and increases in turbidity from construction activities;*

e. *Proposed schedule for construction, monitoring, and reporting;*

f. *An adaptive management framework that requires maintenance or additional improvements based on the results of monitoring; and*

g. *A summary of consultation, including comments received and how the comments were addressed.*

Buoy Line Modifications
The buoy line modifications portion of the plan shall include:

a. *Description of goals and objectives;*

b. *A proposal and associated support regarding whether the swimming buoy line at the Pinecrest Lake swimming area, located southeast of the boat ramp, will be movable or permanently established for the summer (i.e., from End of Spill through Labor Day);*

c. *Proposed location and schedule for the deployment and adjustment of the swimming buoy line, if movable. Description of how the buoy line will be deployed, moved, and maintained; and*

d. *A summary of consultation, including comments received and how the comments were addressed.*

Public Communications
The public communications portion of the plan shall include:

a. *Description of goals and objectives;*

b. *Notification of the anticipated Labor Day Pinecrest Lake level if an elevation below 5,608 feet is forecasted (Condition 4 of the certification). With reference to the information in the Pinecrest Lake Level Study Report, the notification shall include a summary of impacts to the following facilities at Pinecrest Lake based on the forecasted Labor Day Pinecrest Lake level: gas dock and boat slips, boat ramp and courtesy dock, buoyed swim area, mixed day-use area, Americans with Disabilities Act-accessible fishing platforms, and overflow areas (south and north shores);*

c. *Notification of the anticipated date when the Pinecrest Lake level will reach 5,595 feet if the forecasted lake level (Condition 4 of the certification) will be below 5,595 feet on Columbus Day. The notification shall include a summary of fire protection services at Pinecrest Lake and a description of impacts to fire protection services based on the anticipated date;*

d. *A summary of parties that will be notified, which shall at a minimum include: USFS, Pinecrest Lake Resort, Pinecrest Permittee Association, TUD, Tuolumne County, local businesses and facilities within the Pinecrest Lake area, California Department of Forestry and Fire Protection, and Tuolumne County Fire Department (TCFD);*

e. ***A summary of communication methods to be used, which at a minimum shall include: website notifications, mail, email, flyers/handouts on notice boards, local businesses, and facilities in the Pinecrest Lake area, and one centrally located sign.***

f. ***Proposed schedule for notifications; and***

g. ***A summary of consultation, including comments received and how the comments were addressed.***

The Licensee shall implement the Pinecrest Lake Plan upon Deputy Director approval and any other required approvals, in accordance to the schedule and requirements specified therein. The Licensee shall provide a report documenting implementation of the Pinecrest Lake Plan to the Deputy Director for review and approval. The Licensee shall file with FERC Deputy Director approval of: (1) the Pinecrest Lake Plan; and (2) implementation of the activities outlined in the Pinecrest Lake Plan.

5. *In Critically Dry water-years* ***or in years in which End of Spill occurs prior to June 18,*** *the Licensee may propose modifications to Condition #4 above. Licensee shall consult with the Deputy Director and provide justification for modifications to Condition #4. The Licensee shall maintain the* ***minimum streamflow requirement below Strawberry Dam*** ~~*dry year flows*~~ *until modifications are approved by the Deputy Director.* ~~*In addition, until the State Water Board issues a decision modifying the target elevation, the Licensee may propose modifications to Condition #4. Licensee shall consult with the Deputy Director and provide justification for modifications to Condition #4.*~~ ***In years when Pinecrest Lake cannot be maintained at or above the minimum Labor Day lake levels identified in the Minimum Labor Day Pinecrest Lake Levels table, water releases during the period from the End of Spill through Labor Day shall only be made to meet the minimum streamflow schedule and Spring Gap Powerhouse Demand.***