Mendocino County
Russian River Flood Control &Water Conservation Improvement District

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November 28th, 2014

U.S. Army Corps of Engineers
Attn: CECW–CE (Lisa Kiefel)
441 G Street NW.
Washington, DC 20314–1000

RE: Water Resources Reform and Development Act of 2014 (Section 7001-WRRDA 2014)

Dear Lisa,

The Mendocino County Russian River Flood Control and Water Conservation Improvement District (District) is one of the local sponsors of the Coyote Valley Dam, which forms Lake Mendocino. Lake Mendocino was originally constructed by the Corps primarily for flood control purposes. However, water stored behind the dam has become one of the primary water supplies for Mendocino and Sonoma Counties. Many factors affecting reservoir management have changed since the project was built: inflows from the Eel River have been greatly reduced, weather patterns have shifted, demand has increased, and once abundant fisheries have become endangered. These factors have led to the near dewatering of Lake Mendocino four times in the last ten years.

The District believes that if the Corps were authorized to implement two long-overdue projects, reservoir reliability would be greatly improved for both people and public trust resources. These projects include 1) raising Coyote Dam and; 2) utilization of Forecast Informed Reservoir Operations (FIRO).

The District, as a member of the Mendocino County Inland Water and Power Commission (IWPC), has been contributing to the on-going Coyote Dam Feasibility Study for over a decade. The study is intended to determine whether it is "feasible" to raise Coyote Dam an additional 36 feet, thereby doubling capacity of Lake Mendocino. To date, 1.2 million dollars have been spent by the USACE and little or no tangible work has been produced. The District strongly believes the entire "feasibility" process is dubious for the following reasons:

1) Coyote Dam was originally authorized to be built in two phases. The second phase, which was supposed to be constructed in the late 1960's, was to raise the dam 36 feet.
2) The existing dam was expressly designed to be raised up to 36 feet.
3) All materials and easements required for raising the dam were purchased as part of the original appropriation.
4) All areas to be inundated by raising the dam were purchased in fee as part of the original appropriation.

The District is aware that there have been changes in the design standards for USACE facilities since the dam was first constructed. The USACE is currently using those old standards, and the resulting DSAC rating, as justification for not proceeding with raising the reservoir. The District would like to see those standards addressed during the raising process, which would allow for more capacity as well as improved dam safety. The District would prefer to focus public funds on design, permitting, and construction of Phase 2 instead of unnecessary bureaucratic exercises.

In addition to increasing the physical capacity of the reservoir, the District believes re-operating Lake Mendocino will further improve reservoir reliability. Currently, the lake is being operated using a rule curve that has not been changed since 1959. The outdated rule curve frequently mandates that the Corps make water releases that are detrimental under today's conditions. For example, the rule curve for Lake Mendocino prescribed the release of 24,000 AF in January of 2013 that has greatly exacerbated our on-going drought.

To blindly operate the reservoir in the era of satellites and computer modeling is unacceptable. Authorizing the USACE to begin the process outlined in H.R. 3988 ("FORECAST Act") would allow the Army Corps to modernize its operations manual based on changed conditions and advances in science. Had this requirement been in place in advance of the current drought, our communities would not be in a state of emergency.

The District understands that modifying the existing reservoir manual is difficult inside current USACE policy. However if Coyote Dam were raised a new manual would be required. The District believes that it would be in the public interest to authorize both processes concurrently.

Thank you for the opportunity for providing local input to these important federal processes.

Sincerely

Sean K. White
General Manager

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