

Ukiah Valley Groundwater Basin

Groundwater Sustainable Agency

Review Form

Ukiah Valley Basin Groundwater Sustainability Plan

Dear Reviewer,

Per SGMA requirements, a Groundwater Sustainability Plan (GSP) is under development for the Ukiah Valley Groundwater Basin (UVBGSP). Ukiah Valley Basin Groundwater Sustainability Agency (UVBGSA) welcomes feedback on draft sections of the GSP by the broad interests and perspectives of the public.

REVIEWER INSTRUCTIONS:

Given the large number of reviewers, accommodating track changes or other editing options within the original draft sections distributed to all committee members can be challenging. As an alternative to tracked changes editing, please consider using this reviewer form with the following instructions:

- Use the form below to provide comments. Feel free to expand the form as needed.
- For suggested text changes, please copy and paste the text you wish to change and place your suggested edits in track changes or strikethrough features in this document. What is important is that technical staff can see *both* the original draft text and your distinct suggestions.
- Note the line number—from the ***PDF version*** of the draft GSP section—where your comment, question or suggested text edit begins.
- Examples of how to provide feedback are listed in the review form below. Feel free to delete these examples with your submission, and only include your feedback.

Please email comments directly to Amber Fissette (fissettea@mendocinocounty.org), with a Cc to Technical Consulting Team Lead Laura Foglia (lauraf@lwa.com). Please use the following file nomenclature in saving your review document:

UVBGSP_Public Review_[Your name]_date

Please send your comments no later than September 24, 2021.

Thanks for contributing to the draft GSP for the Ukiah Valley Groundwater Basin.

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Reviewer name: Devon Jones, Mendocino County Farm Bureau

Submission date: September 24, 2021

GSP sections reviewed: **GSP Public Draft**

Line Number **Suggested revision** (*please delete example text below once you submit*)

Chapter 5:

Line 94: Is water use sector mean groundwater use type such as municipal, residential, agricultural, etc?

Line 95: What is considered “general location” of a well? If the data is being aggregated by use sector, is the “volume” of extraction affiliated with the “general location” such as a map quadrant?

Line 101: Total water use by water source type. Is this proposing to summarize a total surface water diversion quantity within the basin? This is duplicative with the existing SWRCB water rights reporting process.

Line 265-266: this sentence speaks to a communication process. Section 5.1.3.1 discusses various entities the GSA will continue to coordinate with. Is the communication process from line 265 intended to represent coordination with overlying landowners in relation to groundwater resources? If not, perhaps an additional bullet point can be added under line 264 to discuss coordination with property owners affiliated with groundwater use.

299-300: Point of clarity. Is there a limit on fee assessment increases related to SGMA GSP implementation by a GSA if the GSA is holding a sizeable general reserve?

CHAPTER 4:

Line 18-21: If a GSA management action leads to a change in water use timing, quantity, etc. for an agricultural operation there will most likely be a capital investment (or loss) made to react to the management action and/or related project.

Line 85-87: Related to the comment on line 18-21, there could be significant costs related to compliance with the GSP for farmers and ranchers depending on various unknown variables at this time. Fallowing productive land or not using an existing well is not a choice that will be made lightly. If actions like these are suggested, there are multiple factors that the GSA will need to consider, including a way to reimburse for these losses.

Figure 1, Box 4: How did the scenario of curtailing ag pumping come to fruition? Wouldn't more appropriate scenarios look at overall reduced pumping for all beneficial uses?

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Table 2, P. 3: What are the current water sources for the Mendocino College and Ukiah High projects? It is helpful to know where the current water source is coming from to understand the related water reduction from the projects in Table 2.

Line 146: I don't believe there are any DWR or Bureau of Rec. projects in the basin. Is this reference needed?

211-213: Are there numbers associated with the portion of water rights holders that don't have reliable wells? Is this under natural conditions of curtailment action by the SWRCB in low water years?

258: Understanding that site location for Flood-Mar projects is part of the process, it is a good reminder that during wet years, there is an existing flood plain along the main stem Russian that is mostly in agricultural use for just that reason. There are management issues with existing conditions to work to minimize damage to vineyards, orchards or properties from flooding. Flood-Mar can be appropriate in certain location, but implementation will require substantial interaction with property owners/managers to understand the existing issues with flood damage to avoid adding additional impacts from these projects. Similar comments apply to **lines 396-403**.

277-278: There could be situations where agreements can be made with agricultural property owners in the basin to release water into tributaries from stored water resources. There have been successful projects in Sonoma County on tributaries for instream fishery purposes, but there is most likely an added benefit of some degree of recharge.

375: creating recharge basins in the upper main stem Russian River below Lake Mendocino would be a challenge. Is the river channel referenced here the West Fork?

388: Urban stormwater runoff already travels through existing agricultural field during high flows. The urban areas on the West side of Highway 101 discharge onto the ag properties on the East side of 101. One reminder to incorporate into these concepts with stormwater management is the amount of debris and other components that are flushed onto agricultural properties from urban runoff. Looking at ways to reduce this "run-on" onto agricultural properties is important.

428: Conservation easements come with various conservation terms or requirements. Farm Bureau does not like to see working lands taken out of production solely for a conservation purpose. Looking for ways to maintain a working landscape while concurrently achieving a conservation goal is preferred.

455: snow shade and accumulation are not an issue in this basin

462-463: any chance of river disconnection during low flow years is associated with overall water demand from ALL beneficial uses and not just irrigation. The wording, "lessening the chance of river disconnection during critical dry periods" should be removed.

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Also, urban irrigation efficiency improvement should be included in this section.

489: what is the definition of full-season irrigation?

496-498: Crop rotation can be a challenge. Mendocino County does not have the machinery and infrastructure related to harvesting a lot of the winter crops that would only be dependent on natural water supply.

499-502: Most irrigation in the basin is via under canopy sprinklers in orchards or drip in vineyards. The presence of using irrigation pivots is minimal on a small acreage of hay ground.

507-509: Farm Bureau does not support the conversion of working lands into solar farms.

516-540: The history of crop production in Mendocino County has revolved around “cash crops” such as hops, prunes, pears and now wine grapes. There is some degree of crop variation, but our rural location and distance from processing infrastructure is what has limited diversity. Our last prune orchard was removed when the last prune dryer in Sonoma County closed. The point is, that there may be several lower ET crops that could be grown in the county, but economically, would not be viable. Any alternative crop would also have to be machine harvestable since labor intensive crops are also not viable.

Continuing to encourage the removal of water intense landscaping in urban settings, such as lawns (private and municipal), should also be included in this section.

583: The SWRCB and regional water boards don’t have jurisdiction over percolating ground water. Farm Bureau is concerned that under emergency orders seen in 2021, the SWRCB is looking to expand this jurisdiction. Local well owners may be willing to collaborate with the GSA, but not if there is a chance that the data provided is shared with all the other agencies listed.

595-600: there are assumptions being made that all groundwater is hydrologically connected in the basin and that reducing the use of wells by increasing the use of contract water will automatically reduce an assumed loss of surface water to groundwater. This statement seems overly broad.

Chapter 3

Line 136: “significant additional”. The GSP will work to analyze the surface to groundwater interaction to avoid any significant streamflow depletion that is determined to be related to groundwater pumping. The word “additional” makes assumptions of current conditions that have yet to be determined. The word additional should be removed.

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175: How are potential future economic impacts to groundwater users accounted for within a GSP?

390: “rivers cease to flow”. Is this referencing the West Fork Russian River?

641-644: this section is a bit confusing. Is the term Rural Residential and Agricultural Residential? Are these non-commercial agricultural wells?

652-653: The reference to beneficial users and water rights holders doesn't seem to fit in the description of environmental uses.

817: specifying land trusts and resource conservation agencies does not match the other sections that just list coordination with other agencies and stakeholders. The use of other agencies is more consistent.

825-826: What is meant by lack of available information concerning surface water diversion data? Is this data not available in the SWRCB water rights reporting system?

912: is this figure in development?

997: NCRWQCB basin plan for clarification.

1201: What is the definition of agricultural residential?

1341: are naturally occurring NOIs reported to the NCRWQCB?

1423: It is agreed that there is not a historical documentation of subsidence, however there are active faults in the basin. Is there consideration for tectonic action in the SGMA process for land subsidence or surface/groundwater interaction?

1498: Has it been determined that the entirety of the basin is interconnected to the mainstem Russian River? What divides the sections of the basin considered main stem versus tributary?

It is recommended to rephrase line 1498.

1560: ... will ultimately be used to quantify POTENTIAL ISW depletions.....

1606-1607: again, what is the lack of historical and surface water diversion referring to? Is this in addition to the SWRCB water rights reporting records?

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1629: What are the surface water diversion data gaps?

1752: this line seems to be a combination of two lines. Agricultural Land Uses and Users should be moved down.

1756: when releases from LAKE MENDOCINO

Figure 10: NOTE: The Fort Jones reference is not applicable.

Chapter 2

Table 4: Update director for tribal seat and name alternates

Table 6: Update tribal seat

Table 6: ag use/ private user under public water systems needs to be moved up for Levi Paulin under the TAC.

1498: Cannabis isn't an agricultural commodity. It is an agricultural product.

1597: since this section describes surface water resources, should the Potter Valley Project be mentioned perhaps on line 1608 as the water in the East Fork coming into the lake is connected to the Project? There is reference to the PVP on line 1657.

Table 16: The NMFS gauge on Robinson Creek may not still be operated by NMFS
