



COUNTY OF MENDOCINO

Executive Office

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September 4, 2015

California Department of Water Resources
Attn: Sustainable Groundwater Management Section
P.O. Box 942836
Sacramento, CA 94236

RE: Draft Basin Boundary Emergency Regulations

Dear Sustainable Groundwater Management Section Chief:

The Mendocino County Water Agency appreciates the opportunity to comment on the Draft Boundary Emergency Regulations. We commend the Department for its intensive efforts to seek input from various constituencies and stakeholders prior to releasing the Draft Regulations. The comments below address our concerns regarding the Ukiah Valley Basin (1-52) boundary, in relation to the draft regulations.

Comments on Modification Types

It is necessary to consider revising the boundary for Basin 1-52 (Ukiah Valley Groundwater Basin) in order to remove the low groundwater yield sedimentary deposits as noted in the State of California's Department of Water Resources (DWR) Bulletin 118. The DWR has ranked the Ukiah Valley Groundwater Basin as a medium priority basin thus requiring creation of a Groundwater Sustainability Agency and a Groundwater Sustainability Plan. The basin area is approximately 37,508 acres with the middle of the basin comprised primarily of Holocene-aged alluvium deposits. However, the basin margins include older sedimentary deposits that have a low groundwater yield and are often not hydrologically connected to young alluvial deposits (Cardwell, 1965). These low yield sediments include Older Terrace (Qto) and Continental Deposits (Qtc) units, both of which are found on the margins of the Ukiah Valley and in some cases, in isolated pockets throughout the Valley. Farrer (1986) suggested that the older deposits around the Ukiah Valley yield a quantity far below that of more recent alluvium deposits. Thus, the areal extent of the productive groundwater aquifer is in reality smaller than what is delineated by Bulletin 118.

When taking into account this information, it is recommended that the Ukiah Valley Groundwater Basin perimeter be redrawn to exclude the older terrace and continental deposits. This boundary change would facilitate a management plan that could more accurately manage the low lying young alluvial deposits which is the intent of the SGMA rather than managing marginal upland low yield older sedimentary units.

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Again, we appreciate the opportunity to comment on the draft regulations and look forward to working with DWR in the future. If you have any questions or would like further information, please contact the Mendocino County Water Agency at (707) 463-4441.

Sincerely,



Carmel J. Angelo
Chief Executive Officer
Water Agency General Manager
County of Mendocino

CC: Board of Directors, Mendocino County Water Agency
City of Ukiah, City Manager
Redwood Valley Water District
Calpella County Water District
Millview County Water District
Willow County Water District
Mendocino County Farm Bureau
California State Association of Counties, SGMA Working Group
Rural Counties Representatives of California, SGMA Working Group

Citations

Cardwell, G.T., 1958. Geology and Ground Water Resources in the Santa Rosa and Petaluma Valley Areas, Sonoma County, California: U.S. Geological Survey, Water Supply Paper 1427.

Farrar, C. D. Ground-water Resources In Mendocino County, California. Sacramento, Calif.: U.S. Dept. of the Interior, Geological Survey, 1986.