

April 22, 2015



Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Submitted electronically: [Jessica.Bean@waterboards.ca.gov](mailto:Jessica.Bean@waterboards.ca.gov)

Dear Chair Marcus,

As California experiences a fourth consecutive year of drought, that could continue into 2016 and beyond, the City of Ukiah supports the Governor's call for increased water conservation and has been working with the residents of the City of Ukiah as well as the other water agencies and companies in the Ukiah Valley and the agencies and companies all along the Russian River. The City has called on its citizens and rate payers to significantly increase their water conservation effort.

The City of Ukiah has serious concerns regarding the State Water Board's proposed regulatory framework to achieve the additional conservation savings. The City is concerned that the Governor's 25% conservation goal does not address the source of each effected water purveyor's supply, which may not accomplish the goal that the Governor intended. This comment letter provides recommendations to the Water Board's proposed regulatory framework of April 1, 2015.

There are several different regions in the state that have drastically different issues as it relates to the drought, and the one size fits all regulations, do not allow regions to use water production in the most strategic manner. For example the City of Ukiah is along the Russian River. The current regulations from the State Water Board for conservation is 20%. This water basin has virtually no impact from the Sierra snowpack which is one of the biggest issue in forecasting the states drought. The Russian River is the supply line for many of the water purveyors in in the Ukiah valley, in Mendocino County as well as several purveyors in northern Sonoma County. This river is supplied by Lake Mendocino. This reservoir has been severely impacted by the drought conditions of the last several years.

In 2009 the City of Ukiah put in two new groundwater sources, not under the influence of the Russian River, in order to lessen the impact on the Lake. In 2010 the rate payers experienced a 50% rate increase partially as a result of funding these new water sources. This allowed the City to lessen our dependency on Lake Mendocino. The savings our river and the reservoir use was nearly 40% in 2013 as we adjusted to the drought conditions and shifted our water source to the ground water wells. The City was also in the position to forgo our contractual water purchases from the Mendocino County Flood Control District and Conservation Improvement District of 800 Acre-Feet so the District could distribute that water to Redwood Valley Water District, which was in a dire situation and had no other available water.

The City is now in the process of going out to bid for constructing of two more wells in a zone of the City that is not under the influence of the Russian River. The revenue of the City water fund have been impacted by nearly a million dollars in the last year which is one sixth of our revenues. Depending on the revenue impacts of the 20% reduction, our efforts to find additional sources that offset dependency on the Russian River and ultimately Lake Mendocino, may be financially infeasible.

The City is a leader in effort to encourage water conservation in the Ukiah valley. We do this both by the conservation efforts of our very green minded community as well as the conservation efforts to our own facilities. We have complied with every conservation effort that the state has suggested or required in the several years of our drought. We have responsibly maintained our assets such as sports fields and key areas of our golf course while allowing some of our passive areas in our parks go brown. This City has preserved surface water for other agencies that are affected by the level of Lake Mendocino.

The State Water Board needs to consider conservation goals with respect to the use of the Russian River, not the overall production from other water sources. The City has leveraged the water from our ground water sources to help all our neighboring communities. If conservation is tied to all water production and not just that which affects the Russian River, we will not be able to assist our neighbors this year.

We applaud the Governor and the State Water Board for their efforts in this disaster. However, we are concerned that the solutions are not quite in line with the ultimate goal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jane Chambers". The signature is fluid and cursive, with a large initial "J" and "C".

Jane Chambers  
City Manager