



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Northern Region
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March 28, 2025

Sean White
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City of Ukiah New Municipal Well Project
MITIGATED NEGATIVE DECLARATION
State Clearinghouse (SCH)# 2025021131

Dear Sean White:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from the City of Ukiah (Lead Agency) for the New Municipal Well Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

We appreciate the opportunity to provide comments regarding aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency pursuant to CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.). CDFW may need to exercise regulatory authority as provided by Fish and Game Code. For example, if changes are proposed, or if the well is hydrologically connected to the Russian River, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.)

PROJECT DESCRIPTION SUMMARY

The Lead Agency proposes to construct a new well with a capacity of approximately 600 to 1,000 gallons per minute (gpm). The Project activities include construction of a test well to determine the potential capacity of the well, development of the well and related infrastructure, construction of an 800 square foot building to house the well and its electric components, other site development, and the construction of a 1,500 linear foot water transmission line to connect to the City's existing 12-inch diameter groundwater transmission line. Construction of the Project is proposed to begin in the spring or summer of 2025 and take approximately one year to complete.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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Location

The MND identified two preliminary sites (Site 1A and 1B) for Project activities, located on two City-owned parcels situated between Highway 101 to the east, and the Coastal Conservancy's Great Redwood Trail easement to the west. The Russian River is located approximately 1,100 feet to the east of the proposed Project site.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife resources.

I. Project Description and Related Impacts Section 2.1, Page 2-1, Proposed Project Description

Comment 1: The project description does not provide an adequate discussion of the potential impact to groundwater levels and flows within the Russian River that may occur with the installation of a new production well. The MND disclosed that the Project would be implemented in five phases, with drilling of a test well to occur in Phase 1. This exploratory activity would evaluate the intervals and depths of both permeable and non-permeable soils below ground surface, and the permeability of that material.

CDFW Recommendation 1: As the proposed well site is approximately 1,100 feet from the Russian River and soils are characterized as fine to coarse-grained material with moderate infiltration rates (Ukiah Valley Basin Groundwater Sustainability Plan chapter 2.2.1.2 [2021]), Phase 1 should include a study of the potential drawdown of groundwater to determine both the vertical and lateral extent of groundwater levels during pumping. The study should also provide accurate estimates of aquifer parameters (i.e. hydraulic conductivity, transmissivity, etc.), which are critical in determining the lateral extent of the pumping influences generated by the well.

II. Environmental Setting and Related Impacts Section 3.4, Page 3-11, Biological Resources

Comment 2: The proposed Project may have a substantial adverse effect through the reduction of instream flows within the Russian River on federally listed species including Chinook Salmon (*Oncorhynchus tshawytscha*), Steelhead Trout (*O. mykiss*), Coho Salmon (*O. kisutch*), amphibian California Species of Special Concern including red-bellied newt (*Taricha rivularis*) and foothill yellow-legged Frog (*Rana boylei*), and riparian plant communities.

CDFW Recommendation 2: CDFW requests the opportunity to review the information collected during the test well's drilling and monitoring (Phase 1) to assess the potential impacts to groundwater levels and flows within the Russian River prior to the Lead Agency commencing Phase 2.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural

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Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

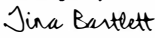
<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the Lead Agency in identifying and mitigating Project impacts on biological resources. Due to the issues presented in this letter, CDFW concludes that the MND does not adequately identify or mitigate the Project's significant, or potentially significant, impacts on biological resources. Deficiencies in the MND can affect later project approvals by CDFW in its role as a Responsible Agency. In addition, because of these issues, CDFW has concerns the Lead Agency may not have the basis to approve the project or make "findings" as required by CEQA unless the environmental document is modified to eliminate and/or mitigate significant impacts, as reasonably feasible (CEQA Guidelines, §§ 15074, 15091 & 15092).

Questions regarding this letter or further coordination should be directed to Jennifer Garrison, Senior Environmental Scientist (Specialist) at 707-477-7792 or CEQAReferrals@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tina Bartlett, Regional Manager
Northern Region
California Department of Fish and Wildlife

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California Department of Fish and Wildlife
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REFERENCES

Ukiah Valley Basin Groundwater Sustainability Agency, Ukiah Valley Groundwater Sustainability Plan, December 2021.