

12/24/2021

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Public Comment

Supervisors,

First, I would like to acknowledge the breadth and scope of work that has resulted in this Groundwater Sustainability Plan. Thank you to Humboldt County Public Works and the Humboldt County Resource Conservation District, The Natural Resource Conservation Services and all of the contractors and consultants who developed the Sustainability Plan. Today, I would like to urge the Board of Supervisors to approve and move this plan on the Department of Water Resources for implementation.

In my opinion, the Eel River basin should never have been designated as "medium priority", the eel river basin did not meet the designation criteria for a medium priority basin as spelled out in the letter to DWR in August Of 2018. The total amount of agricultural irrigation water use calculated by DWR is overstated by 3 times the actual usage as determined by the Humboldt County Resource conservation district. Had the actual amount of irrigation water been plugged into DWR's criteria the basin would have been designated as "Low Priority".

It is very important to remember the physical size of the Eel River Watershed relative to the size of the Eel River Groundwater Basin at 72000 acres while the watershed is 3684 square miles or 2,357,758 acres. That is 32 times larger than the arbitrarily constructed Eel River Groundwater basin. This discrepancy in size between the basin and the watershed places an unfair burden on lower Eel River delta groundwater users. Every gallons that gets consumed or diverted to other watersheds in the upper 85% is less surface water that is available to the lower Eel yet that usage is not regulated proportionally.

Agricultural use of ground water is a primary beneficial use of ground water in the Eel River groundwater basin. The use of irrigation water by farmers is essential to their businesses, it is important to remember it costs money to pump groundwater and buy and install and operate irrigation equipment. Also, operating highly efficient irrigation systems such as K Line, Center pivots and handlines save water and pumping costs. Because of the high cost of irrigating farms, farmers are not wasting irrigation water, consequentially asking them to cut back on this vital component to their business will impose undue hardship on agricultural water users.

Also, let's keep focused on the problem, the shortage of depth of surface water, not ground water, covering the gravel in the Eel River between the confluence of the Van Duzen and the tidal influenced zone upstream of Fern bridge. This surface water depth is critical from late August through the first significant rains of the fall allowing early migration of Chinook salmon. (.7' according to CADF&W) Prior to the 1955 and 1964 floods this stretch of the Eel River contained deep pools and a deeper channel.

These major floods filled these pools with upstream gravel, changing the morphology of this stretch of the river. Instream flow monitoring show that there is water in the channel however it is flowing through the gravel and emerging downstream. A commonsense solution to this flow depth problem would be to remove, by mining, the excess gravel stored in the stretch of the Eel. The engineered removal of excess gravel would expose the necessary flows during the critical months of the year. It wouldn't be difficult to remove one foot of gravel, channel wide. Gravel extraction has been employed at the confluence of the Van Duzen with great success, improving fish passage.

So in closing, I urge you to submit this well executed Groundwater Sustainabilty Plan to the Department and consider expanded gravel extraction projects and permitting in the impaired stretch of the Eel that would improve surface water flow depth.

Thank you,

Jay Russ