

From: [Jacob Patterson](#)
To: [Lemos, June](#); [Munoz, Cristal](#)
Cc: [Miller, Tabatha](#)
Subject: Public Comment -- 9/13/21 CC Mtg., Item No. 7A
Date: Thursday, September 9, 2021 1:12:03 PM

City Council,

I have a few clarifying questions about how the City intends to interpret and/or enforce the Stage 4 restrictions.

1) Unlike now when residents and property owners are permitted to irrigate landscaping and gardens on Tuesday mornings and evenings, Stage 4 doesn't permit any landscaping irrigation. Does the City define landscaping as only ornamental or does landscaping include vegetable gardens for food? That is, will there be a prohibition on people continuing to grow their own food if it requires any use of potable City water to do so?

2) Will the prohibition on irrigating landscaping only apply to first use of City water (e.g., watering outdoors with a hose using "virgin" City water) or will it also extend to reuse of City water first used indoors? For example, I am currently watering my vegetable garden beds primarily using captured greywater that I collect in my sinks (e.g., from dishes). Will that be permitted under stage 4? I assume so since it is a waste to just let it run down the drain rather than capturing it to water a few plants outside but I want to be sure I am not violating any restrictions or be subject to potentially over-zealous code enforcement actions.

I think a little clarity on these matters is useful for the public.

Thanks,

--Jacob

Dear Fort Bragg City Council,

My name is Keith Wyner from Fort Bragg. I would like to thank you for the opportunity voice my concern about conserving water, which I assume is your concern as well. Fort Bragg is now in stage three of water conservation, but are you aware of the water usage that is currently designated in the Jackson Demonstration State Forest harvest plans? There are seven proposed harvest plans and every plan will use up to thousands of gallons of water per day.

The Mitchell Creek Harvest plan states it will be using an estimated 4,000 gallons of water per day, per site, and the Caspar 500 THP plans to use up to 2,000 and 2,500 gallons of water per day. Both harvest plans will be active between April 1st and November 15th.

Mitchell Creek Timber Harvest Plan, Section II, page 58:

Per 14 CCR 923.7[943.7, 963.7](l)(2)(A)-(F) the description of water drafting site conditions and proposed water drafting activity shall include:
General description of proposed site: The proposed drafting location is pond in a Class II tributary to Mitchell Creek at Map Point 11 and "WD4" along Road 500.
Watercourse Classification: Class II ponds
Drafting parameters including:
Month(s) of use – April 1st to November 15th
Estimated volume needed per day – 4,000 gallons per site
Estimated maximum instantaneous drafting rate and filling time - Instantaneous diversion rate shall remain less than 350 gallons per minute (0.78 cfs).
Other water drafting activities in same watershed – None on JDSF, likely multiple with downstream small landowners.
Drainage area (acres) above point of diversion - 23 acres at MP 11 and 9 acres at WD4.
Estimated:
Unimpeded stream flow – JDSF does not have a current record of summer flow rates.
Pumping rate - Estimated diversion rate for a water truck is 270 gpm (0.60 cfs).
Drafting duration – 15 minutes.
A discussion of the effects on aquatic habitat downstream from the drafting site(s) of single pumping operations, or multiple operations at the same location, and at other locations in the same watershed: The quantity of water diverted for dust abatement is minimal relative to the watershed. Habitat will be protected by limiting quantity diverted per day and drafting season.

Closer to home, the proposed Boundry Creek THP, on page 53, plans to use 5,000 - 10,000 gallons of water per day. Where will it get the water? The harvest plan states the water will come from the North Fork and the South Fork of the Noyo river, which is up stream from Fort Bragg's, Madsen Lane water intake station. According Fort Bragg's Water Department's website, the Noyo River is currently at it's lowest flow since the drought of 1977. Can the City of Fort Bragg afford to have 5,000 to 10,000 gallons of water siphoned off from it's Noyo River water source per day, while on Stage 3 Water Restrictions, let alone Stage 4 water restrictions?

Boundary Creek Timber Harvest Plan, Section II, page 53:

Per 14 CCR 923.7[943.7, 963.7](1)(2)(A)-(F) the description of water drafting site conditions and proposed water drafting activity shall include:
General description of proposed site: The proposed drafting locations in the North Fork of the South Fork (NFSF) and South Fork (SF) Noyo River are permitted under LSAA 1600-2017-0022-R1 through 4/25/2022. They have been included in the 1611 notification for reevaluation under this plan. Drafting sites include WD3 on the SF Noyo upstream of the plan area, WD2 above the confluence of the NFSF and SF of the Noyo River, and WD13 downstream on the SF Noyo near the Egg Take Station.
Watercourse Classification: Class I
Drafting parameters including:
Month(s) of use – April 1st to November 15th
Estimated volume needed per day – 5,000 to 10,000 gallons
Estimated maximum instantaneous drafting rate and filling time - Instantaneous diversion rate shall remain less than 350 gallons per minute (0.78 cfs).
Other water drafting activities in same watershed – Parlin Fork Conservation Camp is a year-round facility housing approximately 115 people. A potable water intake is within the SF Noyo River downstream of its confluence with Parlin Creek. The main water intake is an infiltration gallery buried about 18 feet below the surface within the stream gravels. Potable water passes through a water treatment plant adjacent to the channel near the water intake. An existing domestic water supply source is located in a spring at the top of a Class II watercourse below the Whiskey Springs Residence. Two or three timber harvest plans may be drafting for dust abatement purposes during the logging season. No other drafting location is currently being used in the watershed on JDSF.
Drainage area (acres) above point of diversion - WD3- 5,580 acres, WD2- 6,444 acres, WD13 - 14,016 acres.
Estimated:
Unimpeded stream flow – JDSF does not have a current record of summer flow rates.
Pumping rate - Estimated diversion rate for a water truck is 270 gpm (0.60 cfs).
Drafting duration – 15 minutes.
A discussion of the effects on aquatic habitat downstream from the drafting site(s) of single pumping operations, or multiple operations at the same location, and at other locations in the same watershed:
The quantity of water diverted for dust abatement is minimal relative to the watershed. Habitat will be protected downstream by the parameters allowed under the current 1600 permit. Drafting conditions within the permit and the JDSF Big River and Noyo River Watershed Water Drafting Plan (as submitted with THP 1-17-17-005 MEN) included protection for salmonids. These conditions also meet protection measures recommended by CDFW for foothill yellow-legged frogs. The 1600 permit allows drafting down to 1.0 cfs.

Given that the JDSF does not have a current record of Noyo River Summer flow rates, I strongly suggest that the Fort Bragg City Council refer them to the Noyo River flow charts provided by the FB Water Department to see how low the current flow is. From there, I would suggest to support the current moratorium on logging in JDSF, including stopping the proposed Boundary Creek THP with it's removal of 5,000 - 10,000 gallons of water per day from the Noyo River. This could be critical, especially when the City of Fort Bragg is in any "Stage" of water restrictions, and possibly considering Stage 4 water restrictions.

Though Noyo River flows fluctuate, the photo below was taken from the middle of the Noyo River, near the city of Fort Bragg's, Madsen Lane water intake station, on August 29, 2021.



From Mendocino County Supervisor Ted Williams' Facebook Page, September 8, 2021:

 **Ted Williams** is 🍷 feeling hopeful. 23h · 🌐

I'm hopeful that the first two water loads totaling 10,000 gallons will move from Ukiah to Fort Bragg today, enabling the drought-stricken to once again buy water. Capacity will grow as additional trucking firms sign agreement.


CDPH Licensed Water Haulers:
<https://www.cdph.ca.gov/.../Water/WaterHauler912021.xlsx>

Update: First truckload complete. Second load this afternoon.



While Fort Bragg is having water delivered from Ukiah to help provide water for Fort Bragg and the Mendocino Coast, Jackson Demonstration State Forest plans to resume logging operations at the Caspar 500 THP. Unless the the JDSF logging moratorium is extended immediately, an estimated up to 2,000 to 2500 gallons of water will be extracted per day, with 3 -4 loads per week, according to the Caspar 500 timber harvest plan in Section II, page 59.

From the Caspar 500 Timber Harvest Plan, section II, page 59 :

Per 14 CCR 923.7[943.7, 963.7](1)(2)(A)-(F) the description of water drafting site conditions and proposed water drafting activity shall include:	
General description of proposed site: The site is within an existing Class II watercourse drafting site WD17. It is believed that only 3 to 4 loads of water will be needed weekly during active operations occurring under this plan.	
Watercourse Classification: Class II	
Drafting parameters including:	
Month(s) of use – April 1st to November 15th	
Estimated volume needed per day – 2,000-2,500 gallons	
Estimated maximum instantaneous drafting rate and filling time - Instantaneous diversion rate shall remain less than 350 gallons per minute (0.78 cfs).	
Other water drafting activities in same watershed – N/A	
Drainage area (acres) above point of diversion – WD17 – 80.5 acres	
Estimated:	
Unimpeded stream flow – During summer months with drafting activities the average stream flow is 6.80 gpm	
Pumping rate – Estimated diversion rate for a water truck is 270 gpm (0.60 cfs)	
Drafting duration – 15 minutes	
A discussion of the effects on aquatic habitat downstream from the drafting site(s) of single pumping operations, or multiple operations at the same location, and at other locations in the same watershed:	
The quantity of water diverted for dust abatement is minimal relative to the watershed. Habitat will be protected downstream by the parameters allowed under the current 1600 permit. Drafting conditions within the permit and the JDSF Water Drafting Plan (as submitted with THP 1-13-007 MEN) included protection for salmonids. These conditions also meet protection measures recommended by CDFW for foothill yellow-legged frogs.	

If the city of Fort Bragg would like to conserve water, I can think of a simple way to conserve 1,000s of gallons of water per day on the Mendocino Coast starting from this moment. That would be to continue the logging moratorium in Jackson Demonstration State Forest, and stop the extraction of 1,000s of gallons per day that it does not have it to spare. And that is just for one of the harvest plans!

The current logging moratorium in JDSF, may end soon with logging starting in the Caspar 500 THP. You might say, that's in Caspar, not Fort Bragg. But you must remember we are all in this together. When

Mendocino was running low on water, Fort Bragg stepped in to help to provide water, until Fort Bragg ran low and had to stop. Now water is being shipped to Fort Bragg from Ukiah.

I would like to request that the Fort Bragg City Council write a resolution to immediately support the continued moratorium on all logging operations in Jackson Demonstration State Forest to stop all timber harvest plans, not only to save the old 2nd growth redwood trees, and to preserve it for recreation, but mostly to conserve the thousands of gallons of water that those harvest plans intend to use per day, and the millions of gallons of water they will use for the duration of the harvest plans. That water will be needed for the well being, and possible survival of the residents and businesses of Fort Bragg, and the Mendocino Coast.

Thank you for trying to find solutions for the current water crisis in Fort Bragg and on the Mendocino Coast, and also for considering the request to support the continued moratorium of logging in the Jackson Demonstration State Forest.

Keith Wyner
Fort Bragg, Ca.
95437
kwyner@mcn.org