July 21, 2004

Sonoma County Grand Jury
P.O. Box 5109
Santa Rosa, CA 95402

Subject: Response to 2003 Grand Jury Report

Honorable Grand Jury Members,

We have written this letter to respond to the section of your report titled “Got Water”, which specifically relates to groundwater availability and management in Sonoma County. We share your concerns on groundwater management and appreciate the opportunity to comment on these recommendations. We offer the following responses to the specific recommendations listed at the end of your report:

R1. The county and each of its cities should adopt or amend a sustainable water element as part of their general plan with a target date of January 1, 2005, the adoption date of the next general plan.

We assume that the intention of this recommendation is to include public education and conservation program elements in its General Plan, as described in the text of the report. It is important to note that the City of Healdsburg has already implemented a number of very successful measures to conserve our water supply, including leak detection and repair, metered water sales, and conservation pricing. The net result of these efforts is that annual water use in Healdsburg has remained relatively flat between 1990 and 2000, despite a population increase of 13%, and in fact is slightly below its levels from 10 years ago.

Looking towards the future, Healdsburg has recently taken steps to reduce water demands from some of its largest customers, including golf courses, over the last decade. The City of Healdsburg has also adopted two separate growth management measures that significantly limit growth and the resulting increase in water demands. The City’s Urban Growth Boundary was adopted in 1996 and places a geographic limitation on the expansion of the City limits and a limit on the extension of City services through the year 2016. In 2000, the voters also adopted a Growth Management Initiative. This Growth Management Initiative limits new market rate residential dwelling unit construction to no more than an average of 30 units per year, and this has been incorporated into the General Plan policies. These measures, by law, limit the residential growth potential of the City to less than 1% per year. Water supply increases are therefore expected to continue a stable or downward trend in Healdsburg for many years to come.
We appreciate and recognize the importance of effective water conservation measures, and based on your recommendations will consider incorporating these or similar water conservation measures when the City completes its next General Plan update, which we tentatively expect to be in 2005.

R2. The county and each of its cities should adopt and develop a comprehensive groundwater management plan such as that set forth in AB 3030. The information from the existing groundwater studies should be used to provide a bank of information upon which to initiate a groundwater management plan.

The City of Healdsburg, like virtually all other cities and communities adjacent to the Russian River in Sonoma and Mendocino counties, relies on the Russian River system and the two federal water supply projects within the watershed, Lake Mendocino and Lake Sonoma, for its water supply. The Russian River is a highly regulated system, with releases from Lake Mendocino and Lake Sonoma jointly managed by the US Army Corps of Engineers (Corps) and the Sonoma County Water Agency (SCWA). Both the Corps and the SCWA have been deeply engaged in a variety of exhaustive and highly complicated water supply planning activities, the most significant of which is compliance with the Endangered Species Act listings for salmonids in the Russian River and its tributaries. The City monitors these planning activities closely, and participates to insure the long-term reliability and sustainability the City’s water supply.

For the purposes of regulating the quantity and availability of water, all of the City’s municipal water supply is treated as surface water. The City of Healdsburg does not rely on any groundwater sources. Although there are a number of private groundwater wells within the City of Healdsburg, their numbers are very limited, and the City has policies in place to require abandonment of these private groundwater wells and conversion to the City’s municipal water system. Consequently, dependence on true groundwater supplies within the City of Healdsburg is extremely limited, and there are no identified overdraft or groundwater shortage problems within the City. Given these facts and the continued trend away from groundwater, a formal citywide groundwater management plan for Healdsburg would not be appropriate.

The Grand Jury report points to the example of the Santa Clara Valley Water District, which uses groundwater for approximately half its water supply, as a model groundwater management program. The Santa Clara district is comprised of a completely urbanized area overlying a groundwater basin that has been intensively used for decades, and the groundwater basin itself is now intensively managed for groundwater recharge and extraction. While some areas in Sonoma County, where groundwater is used, have experienced problems with groundwater availability, none of these compares in scale to the example of the Santa Clara district.

Much of the recent discussion in Sonoma County has focused on the perceived need for countywide management of groundwater supplies. Much of this concern stems from the increasing use of groundwater supplies in specific areas of the County, specifically in water-short areas such as the Joy Road, Mark West Springs, and Bennett Valley areas, as well as in areas with pronounced groundwater drawdown, such as Rohnert Park. We note that other
communities such as the Town of Windsor plan to significantly increase their use and dependence on groundwater for their future water supplies. If and when a groundwater management plan is adopted at the County level, it should focus only on these water short areas with demonstrated problems, or in areas where there are formal plans for a substantial increase in groundwater use. In areas where groundwater is not used and is not planned to be used, we believe that such a plan would not make sense.

As the Grand Jury report points out, there is a seemingly endless list of agencies with some level of jurisdiction over water supplies in Sonoma County. The missions of these agencies often conflict, and the overlapping jurisdictions and conflicting requirement of these agencies are a frequent source of frustration for local water suppliers, who are simply trying to responsibly provide a reliable, sustainable and safe water supply for their respective service areas. The degree to which this complicates and frustrates this basic mission is difficult to convey to anyone not on the receiving end of these regulations. Any comprehensive groundwater management plan should avoid imposing yet another overlapping jurisdiction and additional conflicting regulations. Specifically, any groundwater management plan should exclude areas where water drawn from wells is regulated as a surface water source by the State Water Resources Control Board. This would include the alluvial aquifers of the Russian River and its tributaries, where there is a direct connection between the surface water and alluvial groundwater.

Again, we appreciate the opportunity to comment on the report. Please feel free to contact me if you have any questions or concerns specific to Healdsburg.

Sincerely,

Chet Wystepek
City Manager