

From: [Close, Colin](#)
To: [Manis, Dina](#)
Cc: [Martin, Peter](#); [Alan Levine](#)
Subject: FW: [NCSFC] RE: [EXTERNAL] City of Santa Rosa - Water Use and Development Offset Fees
Date: Monday, November 29, 2021 4:32:26 PM

Hi Dina

Mr. Alan Levine of the Coast Action Group asked me to submit his comments for the public record. Can you assist in this matter?

Thank you,
Colin

-----Original Message-----

From: Alan Levine <alevine@mcn.org>
Sent: Monday, November 29, 2021 4:16 PM
To: Close, Colin <CClose@srcity.org>
Cc: sonoma-county-water-coalition@googlegroups.com; brock@oaec.org; Martin, Peter <PMartin@srcity.org>; Stephen Fuller-Rowell <sjfr2@aol.com>; Brenda Adelman <rrwpc@comcast.net>; fleming.victoria@gmail.com
Subject: RE: [NCSFC] RE: [EXTERNAL] City of Santa Rosa - Water Use and Development Offset Fees

Hi Colin

I found a meeting at 4 tomorrow - which included some water stuff - reports from committees. Is that it? Not sure I will be there. I would like you to enter my comments in the file on this "Project".

The WDO policy is not buildout policy per se. However, the WDO policy is in place to estimate secured water savings that are, or can be, used to justify buildout. The language in the policy that has been presented substantiates that fact. And, I have not been provided, (the policy assumptions with review has not provided) any estimate of level of certainty related to actual levels/amounts (and degree of certainty) of water savings that would support further buildout. Nor, has there been any peer review associated with this policy and findings.

Finally, the level/amounts of contracted water delivered to the City of Santa Rosa by SCWA is not for sure = can not be relied on. There are a number of limiting factors that can limit SCWA's delivery capability (climate, PG & E failure to re-license, water stealing along the upper Russian River, etc.). Management should be very conservative (which it has not been).

On the water quality of the City well at Farmers Lane. I have a well nearby and was noticed by the Regional Board not to drink that water due petroleum distillate contamination. My well is 80'. Maybe the City well is much deeper taking from a different source.

BTW - we have measured subsidence with laser measuring tools.

Alan

> Dear Mr. Levine,

>

>

>

> In case it's of interest, City Council will hold a public hearing on
> the WDO Policy and fees tomorrow (Tuesday Nov 30th) at or after 5:00
> pm. The public is invited to attend and submit comments. Meeting
> access information (including instructions for participating) and

> meeting documents are available at <https://santa-rosa.legistar.com/Calendar>.

>

>

>

> Regarding the WDO Policy, it is not intended to be a “buildout”
> policy. It was developed to provide a mechanism for implementing the
> Shortage Plan requirement that new construction offset new water
> demand during severe water shortages that require existing customers
> to adhere to water allocations (water rationing).

>

>

>

> Regarding the City's Farmers Lane public water supply wells, these
> wells provide very high quality water and are not contaminated. The
> City submits all sampling results for its water supplies to the State,
> and test results are publicly available at <https://sdwis.waterboards.ca.gov/PDWW/>.
> The City's public water system name is “SANTA ROSA, CITY OF” and the
> water system number is CA4910009.

>

>

>

> The City also publishes a Water Quality Report each year. The 2020
> Water Quality Report (and additional information about the City's
> water quality
> program) is available at <https://www.srcity.org/993/Water-Quality>.
> Reports going back to 2006 are available at
> <https://srcity.org/Archive.aspx?AMID=71>.

>

>

>

> Regards,

>

> Colin Close | Senior Water Resources Planner Santa Rosa Water | 69
> Stony Circle | Santa Rosa, CA 95401
> Desk: (707) 543-4524 | Cell: (707) 322-1575 | Email:
> cclose@srcity.org<<mailto:cclose@srcity.org>>
> *** I work remotely on Mondays. ***

>

> [email signature cropped]
> [cid:image006.png@01D7E520.426776B0]

>

> From: Brenda Adelman <rrwpc@comcast.net>
> Sent: Thursday, November 18, 2021 8:04 PM
> To: Stephen Fuller-Rowell <sjfr2@aol.com>; Alan Levine
> <alevine@mcn.org>; Close, Colin <CCclose@srcity.org>;
> fleming.victoria@gmail.com
> Cc: sonoma-county-water-coalition@googlegroups.com; brock@oaec.org
> Subject: Re: [NCSFC] RE: [EXTERNAL] City of Santa Rosa - Water Use and
> Development Offset Fees

>

> PS: My comment was just meant as information in response to Stephen's
> comment. I hadn't read the rest of the email. I in no way want to
> come off as supporting Santa Rosa's huge long list (which I have been
> studying
>) of approved developments and also many other projects now going
> through the planning process....it's obscene given the problems we have
> with water now. Please put me on the 'list' of people opposed to all

> this new development. Santa Rosa has worked hard on bringing water
> use numbers down. Their citizens will be really angry when they fully
> realize where all their water savings are now going.
>
> Brenda
>
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>
>
> Hi all!
>
> That old EIR that was shelved was looking to get 101,000 AF. The
> current limit they are operating under is the same it was for many
> years: 75,000 AF. In the meantime, there has been all kinds of
> documentation on water use, and significant conservation has accrued.
> Total water deliveries for
> 2020-2021 by SCWA was 51,848 AF. Santa Rosa's total deliveries for
> that time period was 17,954 AF. Total deliveries for all prime
> contractors (including SR) for same time period was 42,690.6 AF (not
> counting Marin Municipal which was 7,874 AF) About half of the
> deliveries are to out-of-basin water users (20,540 AF).
>
> Brenda
>
>
> --
> Brenda Adelman
> Russian River Watershed Protection Committee P.O. Box 501 Guerneville,
> CA 95446
> Email: rrwpc@comcast.net<<mailto:rrwpc@comcast.net>>
> RRWPC Website: www.rrwpc.org<<http://www.rrwpc.org/>>
>
>
> From: Sonoma County Water Coalition
> <sonoma-county-water-coalition@googlegroups.com<<mailto:sonoma-county-water-coalition@googlegroups.com>>>
> Reply-To: Stephen Fuller-Rowell <sjfr2@aol.com<<mailto:sjfr2@aol.com>>>
> Date: Thursday, November 18, 2021 at 6:28 PM
> To: <ncsfc@googlegroups.com<<mailto:ncsfc@googlegroups.com>>>, Alan
> Levine <alevine@mcn.org<<mailto:alevine@mcn.org>>>, "Close, Colin"
> <CClose@srcity.org<<mailto:CClose@srcity.org>>>,
> <fleming.victoria@gmail.com<<mailto:fleming.victoria@gmail.com>>>
> Cc: Sonoma County Water Coalition
> <sonoma-county-water-coalition@googlegroups.com<<mailto:sonoma-county-water-coalition@googlegroups.com>>>,
> <ncsfc@googlegroups.com<<mailto:ncsfc@googlegroups.com>>>, Brock Dolman
> <brock@oaec.org<<mailto:brock@oaec.org>>>
> Subject: Re: [NCSFC] RE: [EXTERNAL] City of Santa Rosa - Water Use and
> Development Offset Fees
>
> Santa Rosa is still depending on paper water from the Water Project
> which was abandoned by SCWA many years ago. At that time a letter
> from Randy Poole warned the cities not to rely on increases from the Water Project.
>
> David Keller can give you specifics.

>
> Stephen
> Sent from the all new AOL app for
> Android<<https://play.google.com/store/apps/details?id=com.aol.mobile.aolapp>>
>
> On Thu, Nov 18, 2021 at 3:36 PM, Alan Levine
> <alevine@mcn.org<<mailto:alevine@mcn.org>>> wrote:
> Dear Colin,
>
> Thank you for the response to my comments. I question the validity of
> the information and assumptions that you and the City are relying on.
>
> Offset Program
>
> First, in regards to the Offset program allowing for enough savings
> (from water conservation practices) to actually provide enough water
> for future buildout potential is at best speculative – and – at worst,
> a problem that could put the health and safety of City of Santa Rosa
> at risk (not to mention the anger blowback potential from the
> populace).
>
> As stated, the water use assumptions are accurate. However, you agree
> (below) that the tangible savings are iffy (can be more or less –
> depending on efficiency of the program, acceptance and use by the
> public, and other factors, etc.). Thus, reliance on such speculative
> savings to justify buildout scenarios (no ratio, numbers, or
> quantitative data on savings and related buildout are presented).
> There is no way that reliance on this program to allow for specific
> buildout scenarios to take place is justified or dependable.
>
> If you have numbers (accurate numbers) relating to dependable water
> conservation savings that would support specific levels of buildout –
> please supply such information.
>
>
> Note: I do agree that the City should support and embark on strong
> water conservation programs – inclusive of low flow toilets, sinks,
> showers, rain water catchment (the City does not really help with this
> one), possibly composting toilet application, and water re-use
> infrastructure development.
> As we have seen water supplies are tenuous and conservation does not
> mean that buildout can be supported.
>
> CEQA
>
> I agree, that CEQA may not be applicable such a plan. However, this
> status is has not been completely been determined (the language for
> exemption is convoluted and has conditions). However, I probably will
> not litigate the City on this issue.
>
> Ground Water
>
> Ground water is one of the City’s sources that is not completely
> dependable.
> Thru, the City has been pumping millions of gallons per day to
> supplement water contracted from SCWA (another undependable source).

>> Dear Mr. Levine,

>>

>> Thank you for submitting comments on the Water Demand Offset (WDO)
>> Policy and Fee Study on behalf of the Coast Action Group. We wanted
>> to provide you with additional information in case it is useful.

>>

>> Table 4

>>

>> * The water savings in Table 4 of the WDO Fee Study were calculated
>> for the average household, based on industry research (cited in the
>> fee study). Actual individual homes could save more or less water
>> than the calculated average depending on the number of residents, the
>> toilets being replaced (must be at least 1.6 gallons per flush, but
>> could be as high as 3.5 to 7.0), and other factors such as the flow
>> rates of their old showerheads and aerators.

>>

>> Achieving Offsets

>>

>> * When developing the fee study, the City considered its experience
>> with a wide range of demand management efforts over the past 30+ years.
>> The City selected three water use efficiency programs for the study
>> that can be implemented quickly, have been proven to reduce water
>> use, and are anticipated to generate sufficient participation, with
>> resulting savings. However, the City is not limited to these programs
>> and could determine that it is appropriate to use WDO fees collected
>> for other programs that will achieve offsets. In the future, if the
>> City experiences a severe water shortage condition that requires
>> offsets for new demand, the City will collect WDO fees, segregate the
>> funds, and use them to aggressively implement programs to achieve
>> offsets.

>>

>> CEQA

>>

>> * Section 10652 of the California Water Code (CWC) states that CEQA
>> does not apply to the preparation and adoption of plans such as Urban
>> Water Management Plans and Water Shortage Contingency Plans and does
>> not apply to implementation of actions taken pursuant to CWC Section
>> 10632.

>> This includes Shortage Plan response actions and implementation
>> measures, such as the WDO Policy to implement the water demand offset
>> requirement in the City's 2020 Shortage Plan.

>>

>> Your letter also included comments about the City's groundwater use,
>> water supply, method for determining shortage levels, water use
>> efficiency programs, and measures to address the impacts of
>> development on areas other than water demand. We hope the following
>> information is of interest.

>>

>> Groundwater

>>

>> * The City has been operating two production wells on Farmers Lane
>> since 2007 (typically from April-October). These wells provide about
>> 5% of the City's potable water supply. The groundwater level in both
>> wells returns to artesian conditions, usually within a few weeks
>> after the wells are shut off each year. Operation of the wells has
>> not impeded use of other wells in the area, and there have been no
>> reports of land subsidence associated with the City's use of these

>> wells. More information about the City's use of groundwater and the
>> condition of the groundwater basin are included in Chapters 6 and 7
>> of the City's 2020 Urban Water Management Plan available at
>> <https://srcity.org/UWMP> <<https://srcity.org/UWMP%20>> .
>> * In addition, the Santa Rosa Plain Groundwater Sustainability
>> Agency is preparing a Groundwater Sustainability Plan with a 20-year
>> horizon to ensure the sustainable use of groundwater by all users
>> within the basin.
>> This public agency formed locally in 2017 as required by California's
>> Sustainable Groundwater Management Act. The plan is available at
>> <https://santarosaplainingroundwater.org/gsp/>.

>>
>> Water Supply

>> * The City prepares and adopts its Urban Water Management Plan
>> (UWMP) every five years. This is a long range (25-year) assessment of
>> the reliability and availability of the City's water supplies. As
>> discussed in the 2020 UWMP, the City has sufficient water supply to
>> serve the growing needs of our community (including new development
>> and population
>> increases) through at least 2045 in normal and below average rainfall
>> years (including hydrologic conditions that mimic the driest
>> five-year period on record). However, in severely dry years, the 2020
>> UWMP projects the City will experience water shortages. To be ready
>> for shortages, the City prepares and adopts a Water Shortage
>> Contingency Plan (Shortage Plan) every five years, along with the
>> UWMP. The City's
>> 2020 UWMP and 2020 Shortage Plan are available at
>> <https://srcity.org/UWMP>.
>> * Sonoma Water also prepares an UWMP that assesses its water supply
>> reliability and availability. Sonoma Water's 2020 UWMP discusses the
>> agency's long-term water supply outlook in normal and dry years
>> through 2045. The plan includes Sonoma Water's 2020 Shortage Plan
>> (attached as an appendix) and is available at <https://www.sonomawater.org/uwmp>.

>> Determining Water Shortages

>> * The City's 2020 Shortage Plan explains how the City will assess
>> its water supplies each year to determine if there is a water
>> shortage (Section 3). The Shortage Plan also defines eight water
>> shortage stages (Section 4) and details response actions in each
>> stage to reduce demand (Sections 5, 6, and 7). The Shortage plan is
>> available at <https://srcity.org/UWMP>.

>> Water Conservation Efforts

>> * The City offers a wide range of water efficiency programs for its
>> customers, including rebates for rainwater harvesting systems, plus
>> other rebates, site assessments, technical assistance, tips, free
>> workshops, and do-it-yourself kits. The City does not currently have
>> a rebate program for composting toilets. Information about the City's
>> water efficiency programs is available at
>> <https://srcity.org/WaterSmart>.
>> * The City has implemented water efficiency programs to help its
>> customers reduce water use for over 30 years. In addition, State
>> regulations have significantly increased requirements and standards
>> for water conserving plumbing fixtures, appliances, and landscapes.

>> As a result of these combined efforts, Santa Rosa used 14% less water
>> in
>> 2020
>> than it did in 1990, despite a 53% increase in population (gross per
>> capita water use decreased 44% in Santa Rosa from 1990 to 2020).
>>
>> Development Impacts
>>
>> * The City's Planning & Economic Development Department seeks to
>> consider development impacts in a coordinated manner. Impacts from
>> development are addressed by a number of plans, assessments, studies,
>> initiatives, policies, City codes, and the City's Fee Schedule. More
>> information and a link to the Fee Schedule are available at
>> <https://srcity.org/249/Planning-Economic-Development>.
>>
>> We appreciate that you took the time to submit comments on behalf of
>> the Coastal Action Group.
>>
>> Sincerely,
>>
>> Colin Close | Senior Water Resources Planner Santa Rosa Water | 69
>> Stony Circle | Santa Rosa, CA 95401
>> Desk: (707) 543-4524 | Cell: (707) 322-1575 | Email:
>> cclose@srcity.org<<mailto:cclose@srcity.org>><<mailto:cclose@srcity.org>>
>> <mailto:cclose@srcity.org>>>
>>
>> [email signature cropped]
>>
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>>
>> -----Original Message-----
>> From: Alan Levine <alevine@mcn.org><<mailto:alevine@mcn.org>>>
>> Sent: Monday, November 1, 2021 9:47 AM
>> To: Close, Colin <CClose@srcity.org><<mailto:CClose@srcity.org>>>
>> Subject: RE: [EXTERNAL] Water Use and Development Offset Fees
>>
>>
>>
>> Hi Colin
>>
>>
>>
>> I could have said that this policy qualifies as a project under CEQA
>> - and thus, is subject to in-depth assessment under CEQA mandates.
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>>
>> I did not - as I expect the City to due actual due diligence in their
>> investigation on how this policy might work in the real world.
>>
>>
>>
>> Just collecting moneys as offsets will not assure adequate water
>> supplies.
>>

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>>

>> Be aware.

>>

>>> Dear Mr. Levine,

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>>

>>> Thank you for submitting comments on behalf of the Coastal Action

>>> Group.

>>

>>>

>>

>>>

>>

>>>

>>

>>> Sincerely,

>>

>>>

>>

>>> Colin Close | Senior Water Resources Planner Santa Rosa Water | 69

>>

>>> Stony Circle | Santa Rosa, CA 95401

>>

>>> Desk: (707) 543-4524 | Cell: (707) 322-1575 | Email:

>>

>>> cclose@srcity.org<<mailto:cclose@srcity.org>><mailto:cclose@srcity.org

>>> <<mailto:cclose@srcity.org>><mailto:cclose@srcity.org<mailto:cclose@sr

>>> city.org>%3cmailto:cclose@srcity.org<<mailto:cclose@srcity.org>>>>

>>

>>>

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>>> [email signature cropped]

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>>> 8C630>]

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>>

>>> -----Original Message-----

>>

>>> From: Alan Levine

>>> <alevine@mcn.org<<mailto:alevine@mcn.org>><mailto:alevine@mcn.org<mail
>>> to:alevine@mcn.org>>>
>>
>>> Sent: Friday, October 29, 2021 10:25 AM
>>
>>> To: Close, Colin
>>> <CClose@srcity.org<<mailto:CClose@srcity.org>><mailto:CClose@srcity.or
>>> g<<mailto:CClose@srcity.org>>>>
>>
>>> Subject: [EXTERNAL] Water Use and Development Offset Fees
>>
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>>> Colin
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>>
>>> Included below is some discussion of Water Use, Development, and
>>
>>> proposed Offset Fees
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>>
>>> The City does have a water supply problem. The City is augmenting
>>
>>> supply by pumping ground water.
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>>
>>> There are problems associated with continued ground water pumping at
>>
>>> high rates - cones of depressing and land subsidence (which is being
>>
>>> experienced in areas of continuous high pumping rates. This is
>>> showing
>>
>>> up in damage to foundations, other concrete structures, and actual
>>
>>> movement of home - tilt).
>>
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>>> The City should recognize that this high rate of ground water
>>> pumping
>>
>>> has negative effects and may have limited duration.
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>>> Additionally, supplies from SCWA can be limited in times of sever
>>
>>> drought.
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>>
>>> Adding to the housing inventory, even with offsets, puts added
>>
>>> stresses on the supply system that may not be supported by water
>>
>>> availability (SCWA or groundwater).
>>
>>>
>>
>>> The Offset system may supply some relief. However, the offset system
>>
>>> can not supply any assurance - other than added demand on the system.
>>
>>> Just because there are funds collected for offsets - does nothing to
>>
>>> assure added supply. Money supply does not = water supply.
>>
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>>
>>> Of course the City can employ methods for added water efficiency -
>>> e.g
>>
>>> low flow toilets, showers, sinks, etc..
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>>
>>> Table 4 –Water Use Factors for Water Demand Offset Fees
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>>
>>> This table indicates 10.8 gallons per day saving (assuming 5 uses
>>> per
>>
>>> day) for the ultra low flow toilet (.8) gallon per flush. I think
>>> the
>>
>>> 5 use per day number is understated. It is not that clear how
>>
>>> efficient those toilets are and how many flushes per day occur in a
>>> household.
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>>
>>> The Table indicates the greatest use is in the bathroom (discounting
>>
>>> toilet use) with 37 gallons saved per day by use of aerators. I
>>> would
>>
>>> not rely on this number. Of course aerators on faucets and shower
>>> head
>>
>>> should be used. I just do not think you can count on the savings
>>> number.
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>>> The daily usage figures in the proposal and study document seem
>>> accurate.
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>>> The imposed restrictions related to different stages need additional
>>
>>> clarification. What exactly triggers stage 1 through stage 8? A more
>>
>>> descriptive narrative is needed.

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>>> I did not see support for home collection (tanks/installation)of
>>> roof
>>
>>> runoff rainwater.

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>>

>>> This can be a small supplement for irrigation and fire safety.

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>>

>>> Composting toilet are never mentioned as potential for water savings.

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>>> They work. However, they rely on energy to work and they need some
>>
>>> management.

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>>

>>> Their are constraints on housing buildout potential. Water is just
>>> one.

>>
>>>
>>

>>> There are other issues - including circulation, stormwater, sewage
>>
>>> management, fire event management, evacuation routes, parking,road
>>
>>> maintenance, public safety programs, etc... Looking at one issue
>>
>>> without considering the other issues is a bit short sighted.

>>
>>>
>>
>>>

>> Coast Action Group
>>
>> Affiliate of Redwood Coast Watersheds Alliance
>>
>> (707) 542-4408
>>
>>
>>
>
>
> Alan Levine
> Coast Action Group
> Affiliate of Redwood Coast Watersheds Alliance
> (707) 542-4408
>
> --
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>

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Coast Action Group
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