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Subject: LCP 5.22 Draft Water Element comments
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Attachments: [LCP Water.Elem. Comments 5.22 rmf.pdf](#)

EXTERNAL

Thank you for the hours and months you have spent working on the Local Coastal Plan update. It is much appreciated.

Attached are my current comments and questions on the May 2022 Draft of the Water Resources Element.

Enjoy this beautiful summer day,
Rue

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Date: June 26, 2022

To: Chair Ocana
Commissioners Cornwall, Reed, Deas, Koenigshofer
Staff members Orr, Helfrich, Holup
County Counsel Ball
Director Wick

From: Rue Furch

Re: Sonoma County Local Coastal Plan Update (PLP13-0014)

It is important first to recognize and thank all of you for the time, focus, and consideration you've committed to the process of the Sonoma County Local Coastal Plan Update. Thank you for all of it. Sincerely.

My previously submitted Water Element comments are not listed in the Comment file on line, hence this re-submittal with updated comments and questions specific to this May 2022 Draft.

This document is primarily in response to the Water Element, and there are a few comments to be made from a broader overview.

- Sea level rise, saline intrusion and all climate change impacts should be addressed including mitigation Policies, Programs and Initiative implementations in the Water Element.
- For clarity, please consistently replace "feasible" with "to the maximum extent feasible" in all instances.
- Given that a significant majority of the Coastal Zone is in Water Availability Zone 4, exportation of water should not be included at all.
- Given the distance and impacts of water transfers from potential water resources outside the Coastal Zone, water importation should not be considered. If water availability is to be improved, it should be accomplished within watersheds in the Coastal Zone.
- Please remove Section 5. WATER IMPORTING AND EXPORTING
- Why have "Other Initiatives" on page WR-22 in the previous Draft been omitted?

Page/Section indicated in this format are for your ease of use. **Yellow** highlights are suggested changes. **Blue** highlights are comments and/or questions.

WR-3/Purpose/1st paragraph:

The Water Resources Element establishes goals, objectives, and policies to protect and sustainably manage coastal water resources **for all beneficial uses**. *(see "Reasonable and Beneficial Use" on page WR-7)*

WR-6/Regulatory Framework

1st paragraph:

Development and land use in the Coastal Zone has the potential to create erosion, sedimentation, and degrade surface water quality in coastal waterways, estuaries, **wetlands** and coastal waters.

2nd paragraph:

Waste discharge requirements are set by the Regional Water Board for point sources of pollution, including industrial and commercial uses, community wastewater, **agricultural runoff**, and storm water management systems, and individual septic systems.

3rd paragraph:

Add: Sonoma County's Coastal Zone is primarily designated as a Class 4 water availability area, therefore groundwater quantity and quality shall be protected.

WR-10/1.1 Goals, Objectives and Policies

Objective C-WR-1.3: Plan, site, and design development to minimize the transport of pollutants in runoff from the development, to avoid pollution of coastal waters to the maximum extent feasible.

Objective C-WR-1.5: Reduce Prevent the degradation of surface and ground water quality from the failure of septic and other wastewater treatment systems.

Objective C-WR-1.6: Educate the public about practices and programs to minimize water pollution, and provide educational and technical assistance to agriculture in order to reduce eliminate sedimentation and to increase on-site retention and recharge of storm water to the maximum extent feasible. (CCC REVISED)

WR-11/1.1 Goals, Objectives and Policies cont.

Policy C-WR-1c

(2) Incorporate Treatment Control BMPs to remove pollutants of concern when the combination of site design and source control BMPs are not sufficient to protect water quality, or and to meet State and Federal water quality objectives.

(3) Plan, site, and design development to maintain or enhance on-site infiltration of runoff, where appropriate and feasible. Minimize the installation of impervious surfaces, especially directly-connected impervious areas, and, where feasible, increase the area of pervious surfaces in re-development, to reduce runoff and increase recharge capacity.

WR-12/Goals, Objectives and Policies cont. *(Note: duplicate of C-WR-1e – see below)*

Policy C-WR-1e: Avoid construction of new storm water outfalls and direct storm water to existing facilities with appropriate treatment and filtration, where feasible. Where new outfalls cannot be avoided, plan, site, and design outfalls to minimize adverse impacts to coastal resources from outfall discharges, including consolidation of existing and new outfalls where appropriate minimizing increased flow. (NEW)

Policy C-WR-1e:

(2) Conduct an alternatives analysis to demonstrate that there are no appropriate and feasible alternative project designs that would substantially improve on-site runoff retention, if a proposed development will not retain on-site the runoff volume from the appropriate design storm using a Low Impact Development (LID) approach. *What if the project can't achieve onsite retention? To what extent is off site runoff approvable? How is it measured, maintained. What mitigation measures would be required?*

(4) Use treatment control BMPs or suites of BMPs to remove pollutants from any portion of the design storm runoff volume that will not be retained on-site, or if additional pollutant removal is necessary to protect coastal surface and ground waters.

WR-13/ Goals, Objectives and Policies cont.

Policy C-WR-1g:

(2) Limit the project footprint, phasing grading activities, implementing soil stabilization and pollution prevention measures, and preventing unnecessary soil compaction to avoid runoff and increase recharge capacity to the maximum extent feasible; *How is "unnecessary" defined?*

(6) Requiring soil stabilization Best Management Practices (BMPs) be implemented over disturbed areas as soon as possible during construction and before seasonal rains;

WR-14/Policy C-WR-1g cont.

(11) Requiring BMPs be implemented for constructing, maintaining, and repairing roads and trails in County parks, including stabilizing erosion, clearing vegetation, resurfacing, and removing slide debris. **Where feasible use pervious surfaces.** (NEW) (CCC REVISED)

Policy C-WR-1j: Remove, repair, and/or replace failing septic systems that pose a risk to public health or have potential to pollute groundwater **to achieve current health and safety standards.** (GP2020)

WR-15/ Goals, Objectives and Policies cont.

Policy C-WR-1l: Ensure that agricultural operations reduce non-point source pollution through the development and implementation of California Water Resource Control Board approved ranch plans and farm plans that demonstrate how the applicant ~~intends to will~~ avoid, minimize, or mitigate the impact to water quality from agriculture **to the maximum extent feasible.** (GP2020)

WR-15/1.2 Programs

Program C-WR-1-P1: Develop and provide educational, outreach, or technical assistance programs focusing on water quality to owners and managers of agricultural operations and timberlands. Inform owners and managers of agricultural lands, including vineyards, orchards, row crops, grazing, ranches, and dairies, about the Agricultural Commissioner's Best Management Practices for erosion and sediment control, including on-site retention of storm water, maintenance of natural sheetflow and drainage patterns, and avoidance of concentrated runoff, particularly on steep slopes exceeding 35 percent; and for protection of streams and other surface waters from the effects of livestock grazing **and other agricultural uses or timber operations.** (CCC REVISED - NEW)

Program C-WR-1-P3: ~~Consider developing~~ **Develop** guidelines for development in Rural Communities that would provide for retention of the site's pre-development rate of groundwater recharge. (GP2020 REVISED) **Require development and adherence to guidelines. Where applicable, maximizing groundwater recharge on rural landscapes will be essential to avoiding stream depletion impacts to the critical habitat of ESA-listed salmonids.**

WR-15 & 16/Programs cont.

Program C-WR-1-P4: ... Such a program should include meetings between Permit Sonoma and public water suppliers, Permit Sonoma review of proposed master facilities plans, and referral of Local Coastal Plan changes to all public water suppliers, **the California Coastal Commission and the Water Quality Control Boards.** (GP2020)

WR-16/1.3 Initiatives

Initiative C-WR-1-I3: **Encourage Seek funding for** and support comprehensive studies of long-term changes in climate and precipitation patterns in the County and region. (GP2020)

2. GROUNDWATER

The "Groundwater Quality" section in the previous draft has been omitted. How is it protected?

From Page WR-10 in previous version: Groundwater Quality Poor groundwater quality can be the result of geologic conditions, such as the highly mineralized water extracted from the Sonoma Volcanics or brackish water from the Petaluma Formation. Some groundwater naturally contains dissolved substances that can cause health problems, depending on the concentrations and combinations of the substances present, such as arsenic, boron, selenium, mercury or radon (a gas formed by the natural breakdown of uranium in the soil). According to the State Water Resources Control Board, groundwater is also often polluted by human activities that generate contaminants such as microorganisms, gasoline and diesel fuels, solvents, nitrates, pesticides, pharmaceuticals, and metals. The underground flow and concentration of these contaminants, as well as the intrusion of ocean

saltwater into groundwater, can be influenced by the extraction of groundwater and changes in levels of groundwater and surface water.

WR-19/ 2.1 Goals, Objectives, and Policies

Policy C-WR-2a: Ensure sufficient groundwater quantity and quality for existing and proposed uses reliant upon groundwater wells through application of County standards for pump tests, well yields, pollutant levels, and water storage, particularly for higher capacity wells. Ensure streamflow depletion impacts that affect surface water beneficial uses are avoided or fully mitigated, require developing a streamflow depletion impact analysis and establishing standards. *NOAA has offered cooperation in developing streamflow depletion standards that avoid impacting the critical habitat of ESA-listed salmonids.* (GP2020)

Policy C-WR-2b: Continue the County program to require groundwater monitoring for new or expanded commercial and industrial operations using wells. Where justified by the monitoring program, establish additional monitoring requirements for other new wells to include protections from cumulative impacts. (GP2020)

Policy C-WR-2d: Permit applications for new development that result in a net increase in groundwater use in a Class 3 and 4 Groundwater Availability Areas, or within a watershed that is designated as critical habitat for Steelhead or Coho Salmon shall be denied unless the applicant can demonstrate through a hydrogeologic report that the proposed use will not cause an adverse effect on groundwater resources of the groundwater basin, subbasin, or fractured rock aquifer, and associated stream levels. . The hydrogeologic reports shall **consider*** the following when evaluating impacts to groundwater resources: lowering of groundwater levels, reduction in groundwater storage, seawater intrusion, degradation of water quality, land subsidence, and depletion of interconnected surface water. The hydrogeologic report shall discuss if the development is consistent with an adopted groundwater sustainability plan or groundwater management plan, as applicable to the project site. (CCC REVISED - GP2020 REVISED TO FOR CONSISTENCY WITH SGMA CRITERIA) **Please state what standards against which the considered impacts would be judged. Include the same impacts considered within SGMA, and using the same standards as SGMA. For streamflow depletion impacts, the standard would be avoiding significant and unreasonable impacts to beneficial uses of surface water caused by groundwater extraction*

Policy C-WR-2e: ~~Encourage~~ **Require new or expanded** public water suppliers to monitor and report groundwater levels, yields, and other information on groundwater conditions. (GP2020 REVISED)

WR-20/2.1 Programs

Program C-WR-6:

If an assessment, as defined above, demonstrates a need for additional management actions to address existing **or** foreseeable groundwater problems, a groundwater management plan shall be prepared. The groundwater management plan shall define groundwater sustainably for the **basin watershed**, include recommendations for sustainable yield and sustainable management criteria with minimum thresholds and measurable objectives, and include recommendation for groundwater management policy necessary to achieve groundwater sustainability, pursuant to the California Water Code or the County's land use or other legal authority. Include involvement by the affected water users, well drillers, local agencies, private water companies and landowners. (GP2020)

WR-21/2.1 Initiatives

Initiative C-WR-5: Work with the Regional Water Board and coastal communities to evaluate and monitor impacts on surface and groundwater quality caused by the operation of septic systems in existing and suspected problem areas **employing mapping systems to evaluate and project necessary mitigations.** (NEW)

WR-22/3. Public Water Systems

All public water systems must meet and maintain water quality standards established by the Sonoma County Department of Health Services and the Regional Water Quality Control Boards. The suppliers are required to prepare and adopt wellhead protection plans that will avoid future contamination, and policies **should shall** avoid unnecessary restrictions on development associated with protecting public water wells.

WR-23/ 3.1 Goals, Objectives, and Policies

Policy C-WR-3c:

(8) Monitoring and mitigation measures to assure long-term adequacy of sources, including during possible drought conditions, **prevent cumulative impacts;** and

Policy C-WR-3d: If a water system master plan required by policy C-WR-3c or a monitoring program fails to show adequate water supply or facility capacity for planned growth within the water system service area, connections to new development is prohibited in order to protect services to existing residents **and other beneficial uses.** (CCC REVISED - GP2020)

WR-24/3.2 Initiatives

Initiative C-WR-3-I1: Cooperate with public water suppliers in planning, developing, and constructing storage and transmission facilities needed to supply water **pursuant to in compliance with adopted Local Coastal Plan policies, urban water management plans, water supply agreements, sustainability goals,** master facilities plans and, where applicable, programs to mitigate identified groundwater overdraft conditions. (GP2020)

Initiative C-WR-3-I2: Work with public water suppliers in assessments of the sustainable yield of surface water, groundwater, recycled water, and conserved water, including during possible drought periods. This work should include the exploration of potentially feasible alternative water supplies **within the watershed.** Surface and groundwater supplies must remain sustainable and not exceed sustainable yield. (GP2020) ***There are several terms that are undefined, such as sustainable yield. Terms having to do with groundwater management within the Local Coastal Plan should use definitions consistent with SGMA.***

WR-24/ 4. WATER CONSERVATION AND RE-USE

1st paragraph

Planned re-use of treated water in the Santa Rosa Plain was initiated by the **City of Santa Rosa Subregional Waste-Water Management System** during this same period as part of its regional wastewater system.

WR-25/4.1 Goals, Objectives, and Policies

Objective C-WR-4.1: Increase the use of recycled water where it meets appropriate standards of quality and quantity for the intended use. ***Thanks for this***

Policy C-WR-4e: Ensure that public wastewater disposal systems are designed to reclaim and reuse recycled water for agriculture, geothermal facilities, landscaping, parks, public facilities, wildlife enhancement, and other uses to the extent practicable, provided that the water meets the applicable water

quality standards and is supplied in appropriate quantities for the intended uses. (GP2020) *and thanks for this*

WR-26/4.1 Goals, Objectives, and Policies cont.

Policy C-WR-4i: Encourage monitoring for all water use and **require** water metering for public water suppliers that require water users to pay for costs of the amount of water used. Encourage tiering and other pricing mechanisms for public water suppliers that provide incentives for water users to employ conservation and reuse programs. Actively encourage public water suppliers to maximize water re-use and conservation prior to increasing net water use for new development. (GP2020)

WR-26/4.1 Policies cont.

Policy C-WR-4P2: Require development projects to demonstrate compliance with Federal and State regulations for stormwater and wastewater treatment and discharge. Require these projects to incorporate applicable low impact development practices and reclamation, conservation, and reuse programs **that** are protective of surface and groundwater resources. (CCC REVISED - GP2020)

WR-26/4.1 Programs

Program C-WR-4P4: Develop amendments to County codes that will increase the use of recycled water for new commercial, residential, and agricultural **development of appropriate quality for the use**. (GP2020 REVISED)

~~WR-27/5. WATER IMPORTING AND EXPORTING~~ *There should be NO importation or exportation of water from the Coastal Zone. This section is from the General Plan and more applicable to inland Sonoma County.*

~~5.1 Goals, Objectives, and Policies~~

~~GOAL C WR 5: Ensure that new proposals for surface and groundwater imports and exports are consistent with Sonoma County's ability to sustain an adequate supply of high quality water for all its water users and dependent natural resources.~~

~~Policy C WR 5a: Assess the environmental impacts and the impacts on current and future Sonoma County water users of any proposals to physically export water outside of Sonoma County, or to substantially increase existing out of County exports. Consideration of any proposal to export additional water shall prioritize benefit of and need for the water in Sonoma County, and assure that water needed by Sonoma County's urban, rural, and agricultural water users will not be exported outside the county. (GP2020)~~

~~Please re-consider including this section at all - unless it specifies water availability and use within the Coastal Zone watersheds.~~

WR-28/6. WATERSHED MANAGEMENT

Objective C-WR-6.2: Ensure consideration of the environmental impacts of all proposed water imports and exports **within coastal watersheds in order to achieve surface and groundwater sustainability**.