

February 14, 2011

Project No.: 204-00-08-18

Mr. Akin Okupe
Senior Civil Engineer
City of Woodland
655 N. Pioneer Avenue
Woodland CA 95776

SUBJECT: Response to a Public Comment on the City of Woodland Draft Groundwater Management Plan

Dear Mr. Okupe:

This letter summarizes the response to comments received from a member of the public on the City of Woodland's draft groundwater management plan. On January 30, 2011, Ms. Bernadette Murray, a Woodland resident, submitted comments to members of the Woodland City Council and City Manager. This letter summarizes Ms. Murray's comments and the revisions made to the groundwater management plan. The full text of Ms. Murray's comments is provided in Attachment A.

Comment 1. Ms. Murray requested a delay in adopting the groundwater management plan until after the water rate advisory committee issues its final report, because the final report may contain recommendations that could affect Section 3 of the groundwater management plan. The comment cited three topics in the groundwater management plan that could be affected by the final report of the water rate advisory committee. These were water recycling, salinity and the phasing out of water softeners.

Response 1. Section 3.3.3.2 of the revised groundwater management plan states the following,

“There are currently no water recycling projects in the City. The City is in the early stages of evaluating recycled water use to offset potable water demands. Other potential supplies, including shallow irrigation wells in parks and other public landscape areas, are also being considered for this purpose.

Action: Continue to evaluate alternative supplies that could offset nonpotable demands currently met with drinking water sources.”

The revised groundwater management plan also includes discussion of the Davis Woodland Water Supply Project (DWWSP), which is being undertaken by the Woodland-Davis Clean Water Agency (WDCWA). The WDCWA is a joint powers authority including the Cities of Woodland and Davis and UC Davis. Planned implementation of the DWWSP will provide the City with treated surface water from the Sacramento River in 2016. The City's use of groundwater will continue but at a significantly reduced rate. The salinity of the treated surface water will be much lower than the City's groundwater, and the anticipated proportions of surface water to groundwater make it unlikely that customers will want to continue to use water softeners.

The overall salinity of the City's supply will be significantly reduced as a direct consequence of the DWWSP. The consequential phasing out of water softeners will also decrease salinity in the City's treated wastewater effluent.

The City's urban water management plan is scheduled to be completed by June 2011 and must be submitted to California Department of Water Resources by July 1, 2011. The adopted groundwater management plan needs to be attached to the urban water management plan, per California Water Code Section 10631. Delaying the adoption of the revised groundwater management plan could jeopardize the City's ability to meet the state-mandated schedule for the urban water management plan. Recommendations from the water rate advisory committee's final report can be addressed in the City's water focus study, which is under development. The water focus study is a water planning document with a broader scope than the groundwater management plan. Recycled water will also be addressed in the City's Urban Water Management Plan.

Comment 2. Prior to adoption, the Groundwater Management Plan should be revised to correctly identify the Woodland-Davis Clean Water Agency (WDCWA) rather than referencing the DWSWP (Davis Woodland Surface Water Project).

Response 2. Section 2.2.5.2, Planned Water Supplies, includes the following text.

“The Woodland-Davis Clean Water Agency (WDCWA) is a joint powers authority including the Cities of Woodland and Davis and the UC Davis. The WDCWA is implementing a regional water supply project, known as the Davis Woodland Water Supply Project (DWWSP), to divert, treat and convey Sacramento River water to their respective service areas. The DWWSP will allow the project partners to reduce their groundwater pumping rates, a shift that will facilitate compliance with existing and anticipated wastewater discharge requirements, ensure compliance with existing and anticipated drinking water standards, and help enable adaptive management in response to climate change. The DWWSP will divert surface water from the Sacramento River using a new water intake/diversion facility. The project will also include untreated and treated-water conveyance pipelines, and a new water treatment plant (WTP). Surface water diverted from the Sacramento River will consist of water appropriated for use by the DWWSP Partners and water purchased from users with senior water rights. Local groundwater will continue to be used but at a substantially reduced rate compared with the current usage. The DWWSP Partners anticipate that surface water deliveries will begin in 2016.”

The acronym, DWWSP, is used throughout the following sections of the revised groundwater management plan when referring to the water supply project. The acronym, WDCWA, is used to refer to the agency implementing the DWWSP.

Comment 3. Also the document must clarify whether 100% metering of Woodland will occur in 2018 or in 2012. Both years are stated in different sections of the document. The impact of water metering on projected water consumption is significant and six years is a huge difference in the estimated time to full metered billing.

If actual water consumption reduction exceeds the projected 15% [I estimate 25% may be the real achieved reduction], water rates will have to be increased even more than the projected 20% per year to maintain necessary funding for Capitol Improvement projects, the Surface Water Project, and the terms of the Water Purchase agreement. This should be noted.

Response 3. Section 3.3.3.4, Water Conservation, states the following,

“The City is also implementing a water meter program and has installed meters on many customer water connections. Many of these customers began receiving sample billings based on their metered consumption in the spring of 2010. The City plans to have virtually all of the water connections in the City metered by the end of 2012. Studies by the California Public Utilities Commission have shown that communities with metered water systems use 7 to 20 percent less water than non-metered areas. Therefore, the City can expect a 7 to 20 percent reduction in water consumption once the City-wide metering is complete.”

The State of California approved Senate Bill 7 (SB 7), which requires water providers to reduce their per capita water use by 20 percent by the year 2020. For consistency with the California Public Utilities Commission findings regarding metering and the requirements of SB 7, a 20 percent reduction in per capita water use rates was assumed in the demand projections documented in Section 2.2.4.2 of the revised groundwater management plan. The groundwater management plan is intended to address groundwater-related requirements under California Water Code Sections 10750 et. seq. California Water Code Section 10631 links the groundwater management plan to the urban water management plan, and a 20 percent reduction in demand by 2020 is assumed in both documents. This assumption is consistent with the State-mandated requirements and is appropriate for the purposes of the groundwater management plan and urban water management plan.

Currently, water rates are being structured with approximately a 70 percent fixed component and a 30 percent consumption-based component. This structure is intended to reduce revenue variances, including those that might result from variation in future per capita water use rates.

Comment 4. In the section on Basin Management Objectives [3-1], the description of monitoring groundwater quality under BMO-01 appears inaccurate. The City of Woodland is investing in a Supervisory Control and Data Acquisition System (SCADA) that will replace the manual sampling process that is described in BMO-01. This section should be revised to describe when that SCADA system is anticipated to be fully operational and how the data will be used for monitoring groundwater quality.

Response 4. BMO-1, entitled, “Protect and maintain groundwater quality within the City service area for the benefit of basin groundwater users” pertains to the water quality aspects of groundwater management. SCADA will only monitor nitrate at a few wells that have relatively high levels of nitrate. SCADA will help protect water users. BMO-1 is intended to be proactive in working with groundwater stakeholders to protect the groundwater aquifer. The SCADA will be used for production and operational management by the City, but will not have the capability of automating the groundwater quality sampling needed to support BMO-1. With SCADA, City staff will have the ability to control the wells remotely, but the groundwater quality results discussed under BMO-1 would still have to be monitored through current sampling procedures. The sampling requirements are

largely driven by California Department of Public Health drinking water requirements, which are described in the text. Appendix I describes groundwater sampling procedures.

Comment 5. Also the composition of the members of the GWMP Advisory Committee is represented differently in 1-1 and 3-16 subsection 3.3.5.2 Advisory Committee Formation. The first states that the Advisory Committee is composed of the "WRA". The second states that the Advisory Committee is composed of the "WRA TAC and the Woodland Planning Commission." Not only should the mystery of the real intended composition of the Advisory Committee be solved prior to adoption of the Groundwater Management Plan, but the process whereby the Advisory Committee generates recommendations for the Woodland City Council should be spelled out. Also if indeed, the Woodland Planning Commission is part of the Advisory Committee, then funding for an orientation workshop for Planning Commissioners on basic components of water management should be included as implementation costs ("fiscal impacts") of adopting this Groundwater Management Plan.

Response 5. Section 1.0, Introduction, and Section 3.3.6.2, Advisory Committee Formation, state the groundwater management plan advisory committee will consist of the members of the WRA, including representation by the City of Woodland. Section 3.3.6.2 states,

“The City is an active member of the WRA. The Advisory Committee for this GWMP is comprised of the WRA Technical Advisory Committee (TAC).

Action: Continue to designate City representatives to the WRA TAC and GWMP Advisory Committee during implementation of this GWMP.”

We appreciate Ms. Murray’s interest in reviewing the draft groundwater management plan. We hope that the revisions made to the document address her concerns and that the revised document provides the City of Woodland with the planning tools needed to address the range of groundwater management issues.

Sincerely,

WEST YOST ASSOCIATES



Kenneth L. Loy
Principal Hydrogeologist
P.G. #7008

KLL:nmp

attachments

Attachment A

From: Bernadette Murray [mailto:bemurray2008@gmail.com]
Sent: Sunday, January 30, 2011 6:28 PM
To: Art Pimentel; William L. Marble; Skip Davies; Martie Dote; Mark Deven
Subject: RE: Agenda Item 8 Groundwater Water Management Plan Public Hearing

Dear Woodland City Council members and City Manager:

I am writing to comment on the proposed adoption of the Groundwater Management Plan prepared by West Yost Associates.

I would request that you delay adoption of this GWMP until after you have received the Final Report of the Water Rate Advisory Committee.

There are recommendations from the Water Rate Advisory Committee that I believe will materially impact the implementation actions in section 3 of the Groundwater Management Plan. Specifically, the committee will comment on creating a master plan for the installation of purple piping (for recycled water). Also, salinity and water softeners particularly in future public outreach efforts to phase out the use of water softeners should be included in this GWMP in the section 3 on salinity.

Additionally:

Prior to adoption, the Groundwater Management Plan should be revised to correctly identify the Woodland-Davis Clean Water Agency (WDCWA) rather than referencing the DWSWP (Davis Woodland Surface Water Project).

Also the document must clarify whether 100% metering of Woodland will occur in 2018 or in 2012. Both years are stated in different sections of the document. The impact of water metering on projected water consumption is significant and six years is a huge difference in the estimated time to full metered billing.

If actual water consumption reduction exceeds the projected 15% [I estimate 25% may be the real achieved reduction], water rates will have to be increased even more than the projected 20% per year to maintain necessary funding for Capitol Improvement projects, the Surface Water Project, and the terms of the Water Purchase agreement. This should be noted.

In the section on Basin Management Objectives [3-1], the description of monitoring groundwater quality under BMO-01 appears inaccurate. The City of Woodland is investing in a Supervisory Control and Data Acquisition System (SCADA) that will replace the manual sampling process that is described in BMO-01. This section should be revised to describe when that SCADA system is anticipated to be fully operational and how the data will be used for monitoring groundwater quality.

Also the composition of the members of the GWMP Advisory Committee is represented differently in 1-1 and 3-16 subsection 3.3.5.2 Advisory Committee Formation. The first states that the Advisory Committee is composed of the "WRA". The second states that the Advisory Committee is composed of the "WRA TAC and the Woodland Planning Commission." Not only should the mystery of the real intended composition of the Advisory Committee be solved prior to adoption of the Groundwater Management Plan, but the process whereby the Advisory Committee generates recommendations for the Woodland City Council should be spelled out. Also if indeed, the Woodland Planning Commission is part of the Advisory Committee, then funding for an orientation workshop for Planning Commissioners on basic components of water management should be included as implementation costs ("fiscal impacts") of adopting this Groundwater Management Plan.

For all the above listed reasons, I urge the Woodland City Council to choose course of action number 2 which is to not adopt the Groundwater Management Plan at this time and direct City Staff to address the issues listed above.

Respectfully,

~Bernadette Murray

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