

1 **DRAFT Introduction & Description of Plan Area Sections**
2 **Groundwater Sustainability Plan for**
3 **Petaluma Valley Groundwater Basin**
4

5 ****Note to Reader: Text in Red indicates information that will be modified and/or further**
6 **described in subsequent sections of the GSP****
7

8 **Table of Contents**

9 **1. Introduction 2**
10 **1.1. Purpose 2**
11 **1.2. Administrative Information 3**
12 **2 Description of Plan Area (Reg. 354.8 b) 5**
13 **2.1 General Setting and Jurisdictional Areas (Reg. 354.8 b) 5**
14 **2.2 General Land Use Characteristics (Reg. 354.8 b) 6**
15 **2.3 Water Source Types and Water Use Sectors (Reg. 354.8 b) 6**
16 **2.4 Existing Monitoring Programs and Networks (Reg. 354.8 c, d, e) 7**
17 **2.5 Existing Management Programs and Studies (Reg. 354.8 c, d, e) 10**
18 **2.6 General Plan and Related Plan Land Use Categories 17**
19 **2.7 Well and Project Permitting Policies and Procedures 20**
20 **2.8 Additional GSP Elements (Reg. 354.8 (g)) 21**

21 **List of Figures**

- 22
23 **2-1 Plan Area**
24 **2-2 Topography and Surface Water and Drainage Features**
25 **2-3 Jurisdictional and Protected Areas**
26 **2-4a, b, c Recent and Historic Land Use Maps**
27 **2-5 Water Use Sector and Water Use Type**
28 **2-6 Well Density Map**
29 **2-7a, b, c Existing Monitoring Networks**
30 **2-8 County Zoning Map**
31 **2-9 County Water Availability Zones**

32 **List of Tables**

- 33
34 **2-1 Summary of Land Use Surveys**
35

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1. Introduction

In 2014, the State of California enacted the Sustainable Groundwater Management Act (SGMA), ~~which that~~ substantially changes the way groundwater is managed in California, ~~including in the Petaluma Valley~~. This new law requires groundwater basins and subbasins in California designated as medium or high priority under SGMA be managed sustainably. ~~To s~~Satisfying the requirements of SGMA, ~~generally involves four basic activities be completed by~~ local agencies must do the following:

- 1) Forming one or more Groundwater Sustainability Agency (GSA) to fully cover the SGMA high or medium priority basin/subbasin
- 2) Developing one or multiple Groundwater Sustainability Plans (GSPs) that fully covers the SGMA high or medium priority basin/subbasin
- 3) Implementing the GSP and managing to achieve quantifiable objectives and sustainability within 20 years of GSP adoption
- 4) Regularly reporting data and GSP progress to the California Department of Water Resources (DWR)

The Petaluma Valley Groundwater Basin (Basin), designated as basin number 2-1 in DWR's Bulletin No. 118, is prioritized as a **medium/high** priority basin by DWR and is, therefore, required to comply with SGMA.

1.1. Purpose

The purpose of this document is to fulfill the GSP requirement and present ~~a~~ paths for sustaining groundwater resources in the Petaluma Valley Basin. Primary objectives addressed by this GSP are to:

- Meet requirements of SGMA and DWR's GSP Emergency Regulations (GSP Regulations) by establishing criteria and management actions that will achieve and maintain sustainable groundwater management in the Basin within 20 years of GSP adoption.
- Incorporate the best available scientific and technical information by building on the strong technical foundation established through previous technical studies and voluntary groundwater management activities in Petaluma Valley.
- Integrate the perspectives and interests of the many diverse users and uses of groundwater resources within the basin through a process that provides opportunity for significant public and community engagement
- Leverage the limited available funding and local resources through continued regional coordination and information sharing with other local entities and GSAs.

The development of this GSP benefits from collaborative groundwater and water resource planning and studies by local stakeholders, which had focused on addressing groundwater sustainability issues in the Basin prior to the passage of SGMA.

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1.2. Administrative Information

Petaluma Valley GSA

The Petaluma Valley GSA was formed to meet SGMA requirements in June 2017. The jurisdictional area of the Petaluma Valley GSA is the entire Petaluma Valley Basin and no other GSAs have jurisdiction within the Basin. The Petaluma Valley GSA formed through a Joint Exercise of Powers Agreement (JPA) entered into by the North Bay Water District, Sonoma County, Sonoma County Water Agency (Sonoma Water), Sonoma Resource Conservation District (RCD), and the City of Petaluma, in accordance with requirements of California Water Code Section 10723 for establishing groundwater sustainability agencies under SGMA. A copy of the resolution forming the JPA is included in Appendix A.

The Petaluma Valley GSA is governed by five board members and alternates from the five member organizations, which each appoint one member and one alternate member. GSA Board members are elected or appointed members of their governing bodies who serve at the pleasure of the member organization appointing them. GSA Board members annually elect the officers of the Board for one year terms, which may be extended to multiple consecutive terms. The GSA Board role in the GSP development process is to provide guidance and direction on key components of the GSP and consider recommendations from the GSA Advisory Committee and input from the public. The GSA Board is responsible for approving the GSP and authorizing its filing with DWR.

The Petaluma Valley GSA has an agreement with Sonoma Water for technical support; public outreach and community engagement; grant writing; and GSA administrative support; and with the Sonoma RCD for monitoring services. The GSA also has service agreements with outside firms for legal, financial decision-making, and facilitation services for advisory committee meetings.

Petaluma Valley GSA Advisory Committee

The Petaluma Valley GSA formed an Advisory Committee of 10 members with consisting of appointment of five at-large members appointed from the five member agencies, and five interest-based members appointed by the Petaluma Valley GSA Board:

- 1) Environmental representative
- 2) Rural residential well owner
- 3) Business community
- 4) Agricultural interest
- 5) At-large community representative

The role of the Advisory Committee in the GSP development process is to work towards consensus and incorporate community and stakeholder interests into recommendations to the GSA Board on GSP development and SGMA implementation. Advisory Committee members also report to, and seek input, from their larger constituency groups on key components and proposals related to GSP development. The Advisory Committee makes written recommendations to the GSA Board that reflect the outcome of Committee

126 discussions. To ensure that all viewpoints are heard and considered by the Board, Advisory
127 Committee reports to the GSA Board identify areas of agreement and disagreement among
128 the Committee.

129

130 GSA Coordination

131 Implementation of SGMA in the Petaluma Valley Basin is closely coordinated with
132 neighboring GSAs in Sonoma Valley and the Santa Rosa Plain, as well as local agencies with
133 land use responsibilities including the City of Petaluma and the County of Sonoma. In
134 addition to closely coordinating on managing and monitoring along shared basin
135 boundaries, resources are leveraged and shared by the three existing GSAs in Sonoma
136 County to maximize efficiencies, including shared templates and methodologies for certain
137 GSP components, outreach resources, grant opportunities, and the development of data
138 management system tools and technologies.

139

140 Contact information for the Petaluma Valley GSA is:

141

142 Petaluma Valley Groundwater Sustainability Agency

143 404 Aviation Boulevard, Santa Rosa California [9540695403](tel:9540695403)

144 www.sonomavalleygroundwater.org (707) 524-8378

145

146 GSA Administrator: Ann DuBay, Community & Government Affairs Manager, Sonoma
147 County Water Agency

148

149 GSA Plan Manager: Jay Jasperse, Chief Engineer and Director of Groundwater Management,
150 Sonoma County Water Agency

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2.0 Description of Plan Area (Reg. 354.8 b)

This section provides a description of the Plan Area, including the Basin’s general physical setting and jurisdictional areas, topography and surface water features, land use characteristics, water source types and uses, existing monitoring and management programs, applicable land use plans, and the well permitting process. The numbers in parenthesis in each sub-heading indicate the applicable SGMA regulation.

2.1 General Setting and Jurisdictional Areas (Reg. 354.8 b)

The Plan Area for this GSP is the entire Petaluma Valley Basin, which lies within a northwest trending structural depression in the Coast Ranges immediately north of San Pablo Bay in the San Francisco Bay Hydrologic Region. It is generally bounded on the east by the Sonoma Mountains and on the west by low-lying hills. As shown on **Figure 2-1**, the approximately 46,000-acre Basin extends from San Pablo Bay northward to a series of low hills near the community of Penngrove, and includes the City of Petaluma and communities of Penngrove and Lakeville. As shown in **Figure 2-2**, the principal stream draining the Basin is the Petaluma River, which is tidally influenced from near the center of the City of Petaluma downstream to its mouth at San Pablo Bay. The Basin is located within the Petaluma River watershed and is a subset of the larger watershed.

Neighboring groundwater basins and subbasins are also shown on **Figure 2-1** and include the **medium/high(?)** priority Sonoma Valley Subbasin (designated as basin 2-002.02 by DWR) to the east, the **medium/high(?)** priority Santa Rosa Plain Subbasin (designated as basin 1-55.01 by DWR) to the north, the **very low/medium** priority Wilson Grove Formation Highlands Basin (designated as basin 1-059 by DWR) to the northwest and the very low priority Novato Valley Basin (designated as basin 2-030 by DWR) to the southwest. The Santa Rosa Plain GSA and the Sonoma Valley GSA are the only neighboring GSAs and also formed in June 2017 to implement SGMA in those two neighboring subbasins. **DWR’s 2018 Draft Basin Prioritization proposes a change in priority from very low to medium for the neighboring Wilson Grove Formation Highlands Basin which would trigger SGMA compliance requirements in that basin.**

Available technical information related to the hydrologic connection between the Petaluma Valley Basin and adjacent basins and subbasins is included in **Section 3 (Basin Setting)** and provisions for coordinating with applicable GSAs and other local agencies within neighboring basins are described in **Section 7 (Implementation Plan)**.

While the Plan Area and jurisdiction of the Petaluma Valley GSA is limited to the Bulletin 118 Basin, technical studies (including monitoring data and groundwater flow modeling) indicate that contributing watershed areas outside of the Bulletin 118 Basin are hydrologically connected and represent important sources of inflow (both in the form of surface streamflows and subsurface inflows) to the Bulletin 118 Basin. In recognition of the hydrologic connection with the contributing watershed areas, available data and

200 information from these areas are also included in this GSP. Distinctions between metrics
201 and features associated with the Bulletin 118 Basin and contributing watershed areas are
202 clearly indicated or displayed in relevant sections and figures.

203
204 Local agencies with water supply, water management, or land use responsibilities within
205 the Basin include the Petaluma Valley GSA, City of Petaluma, North Bay Water District,
206 Sonoma RCD, Sonoma Water, and County of Sonoma. **Figure 2-3** shows the jurisdictional
207 boundaries of these local agencies, mutual water companies and public water systems,
208 state and federal lands, and protected lands within the Basin. State lands include the
209 Petaluma Marsh Wildlife Area within tidal marshlands in the southern portions of the
210 Basin managed by the California Department of Fish and Wildlife and the Petaluma Adobe
211 State Historic Park. Federal lands of the San Pablo Bay National Wildlife Refuge are also
212 present within tidal marshlands in the southern portions of the Basin and are managed by
213 the U.S. Fish and Wildlife Service. Other protected lands located within the Basin and
214 contributing watershed areas ~~and shown on~~ (**Figure 2-3**) include city parks and fields,
215 county regional parks and preserves, special district properties and preserves, and non-
216 profit preserves.

217 218 **2.2 General Land Use Characteristics (Reg. 354.8 b)**

219
220 Land uses within the Basin are shown on **Figures 2-4, a, b, and c**. Existing conditions
221 correlate most closely with the DWR 2012 land use survey (**Figure 2-4b**), which indicates
222 the majority of the land in the Basin is native vegetation or water (57 percent). Agriculture
223 represents approximately 23 percent of the land uses and residential, commercial and
224 industrial land uses compose approximately 16 percent of the land uses (primarily within
225 the City of Petaluma and community of Penngrove). The majority of the native vegetation
226 is located in the lower portions of the Basin along the tidal marshlands and in the hills
227 northeast of the City of Petaluma. Throughout the last several decades, the primary
228 irrigated agricultural crop has been vineyards for wine production. Pastures, grains and
229 hay, and dairies, which are primarily not irrigated, are also important land use categories,
230 with a total area exceeding that of irrigated agriculture. The urban and residential areas in
231 the Basin include the City of Petaluma, unincorporated community of Penngrove, and areas
232 of rural and semi-rural residential development.

233
234 Land use mapping over the past several decades provides a measure of growth and land
235 use changes in the Basin, which includes increases in residential and commercial land uses
236 and irrigated agriculture and a resulting decrease in native vegetation or water (**Table 2-1**
237 **and Figure 2-4a and b**). **Figure 2-4c** presents more detailed classification of vegetation
238 types within the Basin and contributing watershed areas from the Sonoma County LiDAR
239 and Vegetation Mapping Program.

240 241 **2.3 Water Source Types and Water Use Sectors (Reg. 354.8 b)**

242
243 This GSP recognizes that the efficient use and conjunctive management of the various
244 available water sources is integral to achieving sustainable groundwater management in

245 the Basin. The Basin has four primary water source types: groundwater, imported surface
246 water, local surface water, and recycled water. An overview of the spatial distribution of
247 the reliance on the four primary water source types by primary water use sectors in the
248 Basin is shown on **Figure 2-5** and provided below. Additional details on water uses
249 associated with the Basin water budget are described in **Section 3 (Basin Setting)** and
250 additional information on the availability and feasibility for future uses is included in
251 **Section 6 (Projects and Actions)**.

252 Groundwater

253 Groundwater resources represent an important and often only source of water supply for
254 many communities and water users in the Basin. **Figure 2-6** presents a map showing the
255 approximate location and density of water wells within the Basin and contributing
256 watershed areas, based on available data from DWR (**note to reader: this map will be**
257 **updated and refined with local information from Permit Sonoma and other well databases**).
258 These groundwater resources are relied upon to varying degrees by rural and urban
259 residents, vineyards and wineries, dairies, and other businesses and also support
260 streamflows and ecosystems present in the Basin. Groundwater represents the primary, or
261 in some cases only available, source of supply for irrigated agriculture (where access to
262 recycled water or surface water is not available), rural residents, and commercial and
263 industrial users in unincorporated areas. Local groundwater represents an important
264 supplemental source of supply for the City of Petaluma, which operates a municipal
265 wellfield within the Basin and contributing watershed areas.
266

267 Imported Surface Water

268 Imported water consists of Russian River surface water sourced from Sonoma Water’s
269 production facilities near Forestville that is delivered via aqueduct to the City of Petaluma
270 within the Basin, as shown on **Figure 2-5**. Imported water represents the primary source
271 of water for urban residents and businesses that are served by the City of Petaluma.
272

273 Local Surface Water

274 Local surface water from the Petaluma River and its tributaries represents an important
275 source of supply for some water users. Information on the approximate amounts of surface
276 water is available through reported surface water diversions filed with the California State
277 Water Resources Control Board.
278

279 Recycled Water

280 Recycled water is treated to tertiary standards at the City of Petaluma’s Ellis Creek Water
281 Recycling Facility and is used for crop and landscape irrigation in lieu of using groundwater
282 or imported water. Recycled water is used for irrigation of agricultural fields, schools,
283 parks, two golf courses and a vineyard.
284

285 **2.4 Existing Monitoring Programs and Networks (Reg. 354.8 c, d, e)**

286 Existing monitoring programs and networks within the Basin have been developed and
287 implemented by many agencies, organizations and volunteers for a variety of purposes.
288
289

290 This section provides a description of the existing monitoring programs and networks. An
291 assessment of the existing monitoring networks and programs for their suitability to
292 comply with DWR’s GSP Regulations, including identification of data gaps, is described in
293 **Section 5 of this GSP (Proposed Monitoring Program)**.
294

295 Groundwater Level Monitoring

296
297 Groundwater-level data in the PVW have been collected by the USGS since 1949 (Cardwell,
298 1958). Additional groundwater-level data in the watershed has been collected by the DWR
299 since the 1950s. Historically, this has included approximately ~~twenty four~~²⁴ wells and
300 currently includes ~~thirteen~~¹³ wells which are privately owned wells monitored through
301 voluntary agreements with DWR. Most of these wells were incorporated into DWR’s
302 monitoring network between the mid-1950’s and 1981. Measurements are generally
303 collected from these wells semiannually in the spring and fall, although a subset of wells
304 are monitored on a monthly basis. The groundwater-level monitoring network has been
305 supplemented through the California Statewide Groundwater Elevation Monitoring
306 (CASGEM) program since approximately 2012, originally currently managed by the City of
307 Petaluma, which includes an additional nine wells:
308

- 309 • Five are former public supply wells that are located within the City’s boundaries.
310 The remaining four wells in the monitoring network are privately owned.
- 311 • One private well is located in the north part of the basin between Penngrove and
312 Cotati.
- 313 • There are two private wells in east Petaluma, one just east of the City limits on
314 Adobe Road, the other in the hills to the east of the wastewater treatment plant on
315 Lakeville Highway.
- 316 • The fourth private well is southeast of Petaluma at the Sonoma Raceway near
317 Highway 37.

318
319 The GSA Board agreed to take over management of the CASGEM Program and has engaged
320 Sonoma RCD to perform the monitoring and conduct outreach to expand the voluntary
321 program.
322

323 Since 2004, Permit Sonoma has administered the Use Permit Groundwater Monitoring
324 Program, which requires the measurement and reporting of groundwater-levels on a
325 quarterly or monthly basis for commercial and industrial projects requiring a use permit
326 and using over 0.5 acre-feet per year (afy) of water.
327

328 Groundwater Quality Monitoring

329
330 Groundwater quality data has been collected through many different programs and
331 initiatives described below. The synthesis and evaluation of results from the below water
332 quality monitoring programs are described in **Section 3 (Basin Setting)**.
333
334

335
336 *Public Water Supply Well Monitoring*
337 The SWRCB's Division of Drinking Water (DDW) monitors public water system wells for
338 California Code of Regulations Title 22 requirements relative to levels of organic and
339 inorganic compounds such as metals, microbial compounds and radiological analytes. Data
340 is available for active and inactive drinking water sources, for water systems that serve the
341 public, and wells defined as serving 15 or more connections, or more than 25 people per
342 day. In the Basin, DDW wells were monitored for Title 22 requirements, including pH,
343 alkalinity, bicarbonate, calcium, magnesium, potassium, sulfate, barium, copper, iron, zinc,
344 and nitrate.

345
346 *GeoTracker Groundwater Ambient Monitoring and Assessment Program*
347 Established in 2000, the Groundwater Ambient Monitoring and Assessment (GAMA)
348 Program monitors groundwater quality throughout the state of California. GAMA is
349 intended to create a comprehensive groundwater monitoring program throughout
350 California and increase public availability and access to groundwater quality and
351 contamination information. GAMA receives data from a variety of monitoring entities
352 including DWR, USGS, and the State Water Resources Control Board (SWRCB).

353
354 *Water Data Library (WDL)*
355 DWR's monitors groundwater quality data and reports the results through the Water Data
356 Library (WDL). Samples are collected from a variety of well types including irrigation,
357 stock, domestic, and some public supply wells. Wells are not regularly sampled, and most
358 wells have only a few sampling measurements and large temporal gaps between the
359 results. Constituents most frequently monitored include dissolved chloride, sodium,
360 calcium, boron, magnesium, and sulfate. Measurements taken include conductance, pH,
361 total alkalinity and hardness (more than 1,000 total samples per parameter). Additional
362 dissolved nutrients, metals, and total dissolved solids (TDS) are also sampled but have
363 fewer sample results available (one to 1,000 samples per parameter).

364
365 *U.S. Geological Survey National Water Information System*
366 The groundwater study conducted by the USGS within the Petaluma Valley Basin have
367 included the collection and analysis of groundwater quality data. Water quality analyses
368 have included major ions, trace elements, nutrients, and stable isotopes (oxygen-18 and
369 deuterium), tritium, the radioactive isotope of carbon (carbon-14) and the stable isotope
370 carbon-13. Data collected by the USGS through these studies is available on the National
371 Water Information System (NWIS) database (<https://waterdata.usgs.gov/nwis>).

372 373 Climate Monitoring

374
375 Climate-related monitoring stations in the Basin and contributing watershed areas provide
376 part of the information necessary for forecasting weather conditions, flood preparedness,
377 drought preparedness, water supply planning, and for determining the Basin water budget.
378 Climate monitoring stations may include sensors to collect data on rainfall, air
379 temperature, relative humidity, wind speed and direction, solar radiation, soil temperature

380 and moisture. Climate data is collected by many stakeholders in the Basin, as shown on
381 **Figure 2-7b**.

382
383 The primary weather station in the Petaluma Valley Basin which has been used to calculate
384 mean annual rainfall is the Western Regional Climate Center (WRCC) climate station in the
385 city of Petaluma (046826). Data is available from 1913 to the present at this station
386 Local agencies are also working collaboratively with the National Oceanic and Atmospheric
387 Administration (NOAA) and the USGS to develop better information on weather conditions,
388 weather and river level forecasting and climate change.

389 Surface Water Monitoring

391
392 Existing or recently active continuous surface water monitoring locations in the Basin and
393 contributing watershed areas are shown on **Figure 2-7b** and include one stream gauge
394 operated by the USGS, eight gauges operated by Trout Unlimited, and one gauge operated
395 by One Rain, on behalf of Sonoma Water. The recently active USGS streamflow gauge on
396 the Petaluma River is located near the city of Petaluma, along the northern end of the
397 tidally influenced reach of the river. Data collection at this streamflow gage began in
398 February 1999 and was actively measured by the USGS through 2016(U.S. Geological
399 Survey, 2016a). Additionally, the city of Petaluma manages five streamflow gauges on the
400 Petaluma River and four gauges on tributaries of the Petaluma River in the Basin, as shown
401 on **Figure 2-7b**.

402
403 Historically, the USGS also operated a streamflow gauge on the Petaluma River located north
404 of the city of Petaluma, along the non-tidally influenced reach of the river. Data collection
405 at this streamflow gage began in October 1948 and ended in September 1963 (U.S.
406 Geological Survey, 2016b).

407 Land Surface Subsidence Monitoring

409
410 In the Petaluma Valley, a global positioning system (GPS) stations monitored by the
411 University NAVSTAR Consortium's (UNAVCO) Plate Boundary Observatory (PBO) program
412 is available for use as an indicator for subsidence. There are currently no regularly
413 scheduled theodolite or total station surveys and no extensometers in the Petaluma Valley.

414
415 The UNAVCO PBO network consists of a network of about 1,100 continuous GPS and
416 meteorology stations in the western U.S. used to monitor multiple pieces of information,
417 including subsidence. There is one station in the Basin located near the Petaluma Municipal
418 Airport (Station P198).

419 **2.5 Existing Management Programs and Studies (Reg. 354.8 c, d, e)**

421
422 There are many existing and previous water management programs, studies and initiatives
423 that cover the Petaluma Valley Basin that have been developed for a variety of purposes by
424 multiple agencies and organizations. This section summarizes those deemed most relevant

425 to groundwater management planning and indicates the type of information and details
426 from these plans that is incorporated into subsequent sections of this GSP.

427

428 USGS Petaluma Valley Groundwater Study

429

430 A study conducted by the USGS and funded by the City of Petaluma, Sonoma Water and the
431 USGS will underpin much of the development of the Basin setting of the GSP. The objective
432 of the study is to develop an updated assessment of the hydrogeology, geochemistry, and
433 geology of the Petaluma Valley, including development of a geographical information
434 system database, collection, and interpretation of water quality data and streamflow
435 measurements, estimates of groundwater recharge and annual groundwater pumping, and
436 development of a computer model to simulate groundwater flow. The study will culminate
437 in a report ~~by in 2018-2019~~ consisting of the following major sections:

438

- 438 • hydrogeologic characterization
- 439 • data collection and interpretation (primarily water quality)
- 440 • numerical groundwater flow model.

441

442 The study utilizes information from previous studies and will integrates them with a digital
443 geologic map, borehole, and geophysical data to create a three-dimensional geologic
444 framework model of the Basin and surrounding Petaluma Valley watershed that defines the
445 subsurface stratigraphic and structural architecture for the study area. The integrated
446 numerical groundwater flow model simulates groundwater flow, surface-water flow, and
447 landscape processes in the basin for 56 years of historical hydrology from 1959 to 2015.
448 The model incorporates the updated hydrogeologic model to represent the multi-layered
449 aquifer system and was calibrated using groundwater level from groundwater monitoring
450 wells and measured streamflow data from streamflow gauges.

451

452 Bay Area Integrated Regional Water Management Plan

453

454 In November 2002, California voters approved Proposition 50, the Water Security, Clean
455 Drinking Water, Coastal and Beach Protection Act of 2002. The Act encourages regional
456 cooperation in water resources planning by providing grant funding for projects identified
457 in a regional plan, referred to as an Integrated Regional Water Management Plan (IRWMP).
458 DWR designed the IRWM planning process to be consistent with the California Water Plan,
459 a statewide water resources planning document that is updated periodically, and intends
460 that IRWM Plans and future updates of the California Water Plan, be integrated further in
461 the future.

462

463 The Bay Area IRWMP defines the Bay Area region according to the San Francisco Bay
464 Regional Water Quality Control Board's (Region 2) jurisdiction, which includes the
465 Petaluma Valley Basin. This region includes all or major portions of the nine counties which
466 surround the Bay. The Bay Area IRWMP is a living document and involves a diverse group
467 of water supply, water quality, wastewater, stormwater, flood management, watershed and
468 habitat agencies, local governments, environmental groups, business groups, and
469 community based organizations.

470
471 Stakeholders from the nine counties developed four Functional Areas in order to identify
472 specific needs and challenges related to each specific Functional area, describe water
473 management strategies to address these needs, and develop a list of potential strategies
474 and implementation projects that maximize benefits and enhance opportunities for
475 regional cooperation within a given functional area. The four Functional Areas are:

- 476 • Water Supply and Water Quality
- 477 • Wastewater and Recycled Water
- 478 • Flood Protection and Stormwater Management
- 479 • Watershed Management-Habitat Protection and Restoration

480
481 For more information on the Bay Area IRWMP visit <http://bayairewmp.org>.

482 Urban Water Management Planning

483
484
485 Urban Water Management Plans (UWMPs) are prepared every five years by
486 California's urban water suppliers to support long-term resource planning and ensure
487 adequate water supplies are available to meet existing and future water demands. Every
488 urban water supplier that either provides over 3,000 acre-feet of water annually or serves
489 more than 3,000 or more customers is required to assess the reliability of its water sources
490 over a 20-year planning horizon considering normal, dry and multiple dry years. The plans
491 are submitted to DWR, which then reviews the submitted plans to make sure they have
492 completed the requirements identified in the [Urban Water Management Planning \(UWMP\)](#)
493 [Act](#) (Division 6 Part 2.6 of the Water Code §10610 - 10656).

494
495 Within the Basin, UWMPs are prepared by Sonoma Water (as a wholesaler) and the City of
496 Petaluma (as a water retailer). The two UWMPs were last completed in 2015 and will be
497 updated in 2020. The Plans discuss and describe:

- 498 • Existing water supplies and infrastructure;
- 499 • Projected water demands over the next 25 years, based on population growth
500 projections, land use designations and growth policies in city and county general
501 plans;
- 502 • Projected water supplies available over the next 25 years, the reliability of that
503 supply, and general plans for water supply projects;
- 504 • Current and planned water conservation activities;
- 505 • A water shortage contingency analysis; and
- 506 • A comparison of water supply and water demand over the next 25 years under
507 different hydrological assumptions (normal year, single dry year, four consecutive
508 dry years).

509
510 As local groundwater makes up a portion of the urban water supply within the Basin, the
511 UWMPs also discuss and describe groundwater production facilities, historical and
512 projected groundwater use and the conditions of the groundwater basin. Thus, UWMPs
513 serve as a routine mechanism for local urban water providers to coordinate and plan for
514 future urban groundwater use. The most recent projections for future urban groundwater

515 use are incorporated into **Section 3 (Basin Setting)**. However, it is noted that UWMPs do not
516 consider rural residential, agriculture and small municipal/mutual water systems.
517

518 In addition to the UWMPs required by the state, local urban water providers perform other
519 water supply planning activities related to groundwater, including development of water
520 master plans, preparation of water-supply assessments for larger proposed developments
521 (more than 500 dwelling units or equivalent), updates of city and county General Plans, and
522 other activities. Information regarding some of these activities is summarized below:
523

- 524 • A Groundwater Feasibility Study was been developed by the City of Petaluma to
525 evaluate groundwater supplies as part of the City of Petaluma’s General Plan update.
- 526 • Sonoma Water has developed a Water Supply Strategies Action Plan in coordination
527 with its water contractors to increase water supply system reliability, resiliency and
528 efficiency in the face of limited resources, regulatory constraints and climate change
529 uncertainties. The Water Supply Strategies Action Plan is currently being updated
530 and will incorporate SGMA-related requirements and initiatives. The most recent
531 version is available at <http://www.scwa.ca.gov/water-supply-strategy/>.
- 532 • Beginning with passage of SB 610 in 2002, water supply assessments must be
533 furnished to local governments for inclusion in any environmental documentation
534 for certain projects that are subject to the California Environmental Quality Act
535 (CEQA). The water supply assessments are required to determine water supply
536 sufficiency for a 20-year projection in addition to the demand of existing and other
537 planned future uses.
538

539 Water Conservation Programs

540

541 Numerous regional and local water conservation programs are operational in the Plan
542 Area.
543

544 The Sonoma-Marin Saving Water Partnership represents 10 water utilities in Sonoma and
545 Marin counties that are signatories to the California **Water Efficiency Partnership Urban**
546 **Water Conservation Council (CUWCC)** and have joined to create a regional approach to
547 water use efficiency. Within the Basin, these utilities include the City of Petaluma and
548 Sonoma Water. Each of these member utilities have water conservation programs to assist
549 their communities reduce water use. Water conservation and water-use efficiency
550 program elements specific to the Sonoma-Marin Saving Water Partnership include:

- 551 • Establishing a conservation coordinator, water waste prohibition, assistance and
552 water loss control programs (audits, leak detection and repair).
- 553 • Urban water metering and conservation pricing (tiered structure).
- 554 • Developing and maintaining public information and school education programs on
555 water and conservation.
- 556 • Specific urban residential programs for indoor (high efficiency toilets, fixtures, and
557 washers) and outdoor landscaping assistance, surveys and retrofits for increasing
558 conservation.

- 559 • Specific industrial and large landscape assistance, surveys and retrofits for
560 increasing conservation.
- 561 • Rebate programs for high-efficiency appliances and fixtures.
- 562 • Qualified water efficient landscaper training that provides education on proper
563 plant selection for local climates, irrigation system design and maintenance, and
564 irrigation system programming and operation.
- 565 • Online water wise gardening website which offers a Mediterranean and native plant
566 list, design and garden installation tips, and irrigation system design and
567 maintenance information.
- 568 • Green business program that provides businesses with water and energy
569 conservation information and incentives, to reduce waste and prevent pollution.

570

571 More information is available at <http://www.savingwaterpartnership.org/>.

572

573 The State Legislature adopted the "[Water Conservation in Landscaping Act of 2006](#)" (AB
574 1881) requiring the Department of Water Resources to update the [State Model Water](#)
575 [Efficient Landscape Ordinance](#). All local land use agencies were required to adopt the
576 model ordinance, or develop an ordinance that is at least as effective by January 1, 2010.
577 The county and cities have developed individual water efficient landscape ordinances. The
578 new water efficient landscape ordinances require a landscape plan check for certain
579 projects, as described in the ordinance. It includes requirements for landscape water
580 budgets, landscape and irrigation design, and irrigation scheduling.

581

582 The Sonoma RCD, Napa RCD, and the USDA Natural Resources Conservation Service
583 developed the LandSmart program to promote productive lands and thriving streams
584 through planning and on-the-ground implementation on beneficial management practices.
585 The program is applicable to a variety of agricultural lands. LandSmart Plans are
586 developed by the agricultural producer, either independently, through workshops, or
587 through one-on-one assistance from an RCD. Producers can also seek certification from the
588 RCD's certification team once plans are complete. Plan templates and guidance materials
589 are designed to assess current practices and identify recommendations for other practices
590 that would benefit natural resources such as water quantity and quality. Practices are
591 prioritized and tracked over time. Information on LandSmart™ is available at:
592 www.LandSmart.org.

593

594 Members of Wine Institute and the California Association of Winegrape Growers
595 introduced the Code of Sustainable Winegrowing Practices Self-Assessment Workbook in
596 2002 to promote environmental stewardship and social responsibility in the California
597 wine industry. The workbook addresses a number of criteria for measuring performance,
598 including Vineyard Water Management and Winery Water Conservation and Quality. More
599 information on sustainable winegrowing practices is available at
600 <http://www.sustainablewinegrowing.org/>. Additionally, the Sonoma County Winegrowers
601 have developed a Sustainability Certification Program for vineyards, which includes water
602 conservation assessments.

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Climate Change Studies and Planning

Projected changes in climate include increased variability in precipitation and rises in air temperature, resulting in a shorter wet season, longer dry season, more droughts and more extreme high flows. To face these potential changes in climate local organizations are working with federal and state partners, including the USGS, DWR, NOAA, and the U.S. Army Corps of Engineers to advance the science in our region in an effort to plan for and adapt to predicted changes. Local agencies have also partnered to form the Sonoma County Regional Climate Protection Authority and developed a [Regional Climate Action Plan](#). Findings and results from these efforts are described in [Section 3 \(Basin Setting\)](#) and incorporated into future model projections in this GSP.

Groundwater Banking Feasibility Study

Due to uncertainties in the reliability of regional future water supplies (both surface water and groundwater), the Water Agency, City of Sonoma, and other local partners, including the cities of Rohnert Park and Cotati, Valley of the Moon Water District, and the Town of Windsor (study participants) have conducted a feasibility study for a regional groundwater banking program (Groundwater Banking Feasibility Study) to investigate the viability of enhancing the conjunctive management of surface water and groundwater resources (GEI, 2013). The feasibility study report is available at:

http://www.scwa.ca.gov/files/docs/water-resources/groundwater//banking/SRP-SVGroundwaterBankingFeasibilityFINAL130625REDUCED_ADA.pdf

Conceptually, the groundwater banking program would involve the diversion and transmission of surplus Russian River water produced at existing drinking water production facilities during wet weather conditions (i.e., the winter and spring seasons) for storage in groundwater basins. The stored water would then be available for subsequent recovery and use during dry weather conditions (i.e., the summer and fall seasons) or emergency situations. The Groundwater Banking Feasibility Study provided an evaluation of the regional needs and benefits, source water availability and quality, regional hydrogeologic conditions, and alternatives for groundwater banking. While groundwater resources in Petaluma Valley were not evaluated as part of the feasibility study, regional information from the feasibility study is applicable to potential groundwater banking alternatives in Petaluma Valley.

Based on the findings from the study, pilot studies to further assess the technical feasibility of Aquifer Storage and Recovery (ASR) as a method for groundwater banking were recommended and currently are being pursued in Sonoma Valley, where a pilot project was completed in Fall of 2018 in the City of Sonoma. The overall objective of the pilot project is to verify and empirically determine specific hydrogeologic and water-quality factors. If the project is successful, next steps are a technical and economic viability assessment of ASR technology in the region. If deemed feasible, the pilot project results could be used to

648 complete environmental documentation and design for a full scale or permanent ASR
649 project in the region.

650

651 Stormwater Management Planning

652

653 In three of its flood zones, Sonoma Water conducted scoping studies to identify
654 opportunities to alleviate flooding, while possibly recharging groundwater aquifers or
655 providing other benefits. The “Stormwater Management-Groundwater Recharge” studies
656 assessed the feasibility of projects in Laguna-Mark West watershed, the Sonoma Valley
657 watershed and the Upper Petaluma River watershed. Information and results from these
658 studies have informed the development of a Storm Water Resources Plan (SWRP). SWRPs
659 are required by Senate Bill 985 (Pavley, 2014) in order to be eligible to seek funding from
660 any future state bond measures for storm water projects. A SWRP is a non-regulatory,
661 watershed-based and stakeholder-driven plan that builds on local storm water
662 management objectives and identifies and prioritizes projects that capture, treat or reuse
663 storm water and dry weather runoff. These projects must provide at least two benefits
664 which may include environmental enhancement, flood protection, groundwater recharge,
665 water quality improvement and/or recreational opportunities.

666

667 Sonoma Water, with support from a Technical Advisory Committee, collaboratively
668 developed the Southern Sonoma County Storm Water Resources Plan covering the
669 Petaluma River and the Sonoma Creek watersheds (including the Basin). Through the
670 planning process, over 60 projects were identified and submitted by proponents for
671 consideration and inclusion. The resulting plan provides a framework for submitting,
672 quantifying, scoring, and ranking future projects in an objective and data driven format.

673

674 Water Quality Regulatory Programs

675

676 The California legislature assigned primary responsibility for protecting and enhancing
677 California’s surface water and groundwater quality to the State Water Resources Control
678 Board (SWRCB), and the nine regional water quality control boards (Regional Water
679 Boards; or RWQCB).

680

681 The State Water Board provides state-level coordination for the water quality control
682 program by establishing statewide policies and plans for implementing state and federal
683 laws and regulations. The regional water boards adopt and implement water quality
684 control plans (basin plans), recognizing the unique characteristics of each region’s natural
685 surface water and groundwater quality, actual and potential beneficial uses, and surface
686 water and groundwater quality problems. Article 3 of Chapter 4 of the Porter-Cologne Act
687 directs regional water boards to adopt, review, and revise basin plans, and provides
688 specific guidance on factors which must be considered in adoption of surface water and
689 groundwater quality objectives and implementation measures. The San Francisco Bay
690 Regional Water Quality Control Board (SFRWQCB) implements water quality regulations in
691 the Basin and contributing watershed areas, including establishing Total Maximum Daily
692 Loads for bacteria and sediment in the Petaluma River.

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2.6 General Plan and Related Land Use Planning

Existing city and county planning activities that are directly or indirectly linked with water supply and groundwater management include general plans and specific plans, in addition to the UWMPs described above. Under SGMA, cities and counties retain their land use authorities, however in recognizing the linkages between land use and water management, SGMA does require increased coordination between land use planners and GSAs. At a minimum, cities and counties must now refer proposed general plan changes to GSAs, and similarly GSPs must take into account “the most recent planning assumptions stated in local general plans of jurisdictions overlying the basin” (CWC §10726.9).

The City of Petaluma and Sonoma County general plans and specific plans provide growth estimates based on build out of land use designations that are used in the UWMPs and in this GSP to project future water demands, and are incorporated into the sustainable management criteria and metrics, including measurable objectives and interim milestones, the sustainability goal, proposed projects and management actions. Projections of future groundwater availability and planned projects and actions needed for sustaining groundwater resources in the Basin will be shared with city and county planners for incorporation into their respective land-use planning and decision-making.

In addition to coordinating on activities within the Basin, coordination and information sharing between the GSA and land use planning agencies will be needed for the contributing watershed areas located outside of the GSA’s jurisdiction. These areas primarily fall within the purview of the County General Plan.

General Plans

Counties and cities are required to develop and adopt comprehensive general plans to guide future local physical development, as required in California State Government Code Title 7, Division 1, Article 5, Section 65300 et seq. Each general plan must contain a statement of policies, including maps or diagrams and text, setting forth objectives, principles, standards and plan proposals. City general plans are focused on providing guidance on growth and development in the urban setting, while the county general plan focuses on the unincorporated areas of the county. Developing and updating general plans involves significant community involvement through workshops, hearings, and public review of draft plans and policies.

The seven mandatory elements of a general plan are Land Use, Circulation, Housing, Conservation, Open Space, Noise and Safety, although the degree of specificity and level of detail varies dependent upon local circumstances and programmatic needs.

The Conservation element of a general plan is typically where water resources are addressed, although other water related topics may also be addressed in other elements.

738
739 Land use elements must reflect the content of the other general plan elements and must
740 account for “rivers, creeks, streams, flood corridors, riparian habitats, and land that may
741 accommodate floodwater for purposes of groundwater recharge and stormwater
742 management...” as identified in the conservation element (Gov. Code § 65302(d)(3)). The
743 housing elements must be updated on a five-year cycle to correspond with state regional
744 housing needs allocations (Gov. Code § 65584 (b)).

745
746 The Petaluma Valley Basin includes areas covered by the County of Sonoma’s general plan
747 and the City of Petaluma’s general plan within the City’s jurisdictional areas (the
748 southwestern portions of the City of Petaluma are outside the Basin).

749
750 *Sonoma County General Plan 2020*

751 The Sonoma County General Plan 2020 contains Land Use, Circulation, Housing,
752 Conservation, Open Space, Noise, and Safety elements in addition to the following four
753 optional elements: Agricultural Resources, Air Transportation, Water Resources, and Public
754 Facilities and Services. The Water Resources Element was developed and included in the
755 Sonoma County General Plan 2020 in recognition of the importance of water resources
756 within unincorporated areas of the county. The main purpose of the Water Resources
757 Element is to ensure that Sonoma County’s water resources are sustained and protected.
758 To achieve this main purpose, the Water Resources Element states that water resource
759 management should consider the amount of quality water that can be used without
760 exceeding the replenishment rates over time or causing long term declines or degradation
761 in available surface water or groundwater resources.

762
763 The Water Resources Element includes goals, objectives and policies for water quality,
764 groundwater, public water systems, conservation & reuse, importing & exporting, and
765 watershed management. These goals, objectives and policies include supporting local
766 groundwater studies and management programs, encouraging activities that protect
767 natural groundwater recharge areas. The Water Resources
768 Element for the Sonoma County General Plan 2020 can be reviewed at
769 <http://www.sonoma-county.org/prmd/gp2020/wre.pdf>.

770
771 The Water Resources Element goals related to groundwater include:

- 772 • Protect, restore, and enhance the quality of surface and groundwater resources to
773 meet the needs of all reasonable beneficial uses.
- 774 • Manage groundwater as a valuable and limited shared resource.
- 775 • Assure that new proposals for surface and groundwater imports and exports are
776 consistent with Sonoma County’s ability to sustain an adequate supply of high
777 quality water for all its water uses and dependent natural resources.
- 778 • Improve understanding, valuation and sound management of the water resources in
779 Sonoma County’s diverse watersheds.

780
781 Other water related topics incorporated in the Sonoma County General Plan 2020 include
782 water availability as a factor in Land Use Map densities that is addressed in the Land Use

783 Element. Land use designations based on the County’s General Plan 2020 are shown on
784 **Figure 2-8**. The Open Space and Resource Conservation Element addresses riparian
785 corridors, wetlands, wildlife protection, tree protection, fishery resources and other biotic
786 resources, water oriented recreation, soil erosion, forestry, and mineral resources. The
787 Public Facilities and Services Element addresses connections to public water systems. The
788 Public Safety Element addresses flood hazards, fire suppression, and hazardous materials.
789 The process for updating the Sonoma County General Plan 2020 is planned to begin in
790 2019.

791
792 *City of Petaluma General Plan*

793 City General Plans guide growth and development in the urban community, and typically
794 involve an urban growth boundary. The UWMPs and General Plans are clearly linked:
795 UWMPs calculate future water demand based on growth and development projected in the
796 General Plan.

797
798 The City of Petaluma’s 2025 General Plan (2008) addresses the following key elements:
799 Land Use/Growth Management, Community Design, Historic Preservation, Natural
800 Environment, Mobility, Recreation/Music/Parks/Arts, Community
801 Facilities/Services/Education, Water Resources Economic Health and Sustainability. Each
802 element in the general plan contains goals, policies and implementation measures that set a
803 course for future land use in the city. Goals summarize how development and future
804 growth should be directed to achieve the general plan vision by identifying physical,
805 economic and/or social ends that the community wishes to achieve.

806
807 The City of Petaluma’s 2025 General Plan Water Resources Element includes water
808 conservation BMPs and goals and policies for water supply and demand, wastewater,
809 recycled water, groundwater supply, water conservation, surface water management and
810 water quality. The Water Resources Element includes the following policies:

- 811
- 812 • 8-P-19 Ensure adequate water supply during emergency situations by developing
813 potential groundwater resources and aquifer storage capacity, combined with
814 management of surface water, to meet overall emergency water supply objectives.
815 The City’s groundwater resources shall be preserved to meet emergency needs and
816 to offset peak demands.
 - 817
 - 818 • 8-P-20 Manage groundwater as a valuable and limited shared resource by
819 protecting potential groundwater recharge areas and stream sides from urban
820 encroachment within the Petaluma watershed.
 - 821
 - 822 • 8-P-21 Protect groundwater quality from surface contamination by requiring 100
823 foot sanitary seals on all new municipal water supply wells.

824
825 Specific Area Plans

826
827 Specific area plans are planning documents that guide the development of a particular

828 geographic area within the county. Any new developments or subdivisions within the
829 defined area must be consistent with the general plan and specific plan. The Central
830 Petaluma Specific Plan provides specific land use and development regulations for nearly
831 400 acres within the city, adjacent to downtown. The Penngrove Area Plan (updated in
832 2008) provides land use and development regulations for the community of Penngrove.
833 The Petaluma Dairy Belt Area Plan (updated in 2008) is primarily located outside and to
834 the west of the Basin. The West Petaluma Area Plan (updated in 2008) straddles the Basin
835 and covers approximately 11,000 acres west of the City of Petaluma.

836 **2.7 Well and Project Permitting Policies and Procedures**

839 Sonoma County Permit and Resource Management Department (Permit Sonoma) is the
840 local agency responsible for administering permits for wells within both unincorporated
841 and incorporated areas of the Basin. Permit Sonoma is also responsible for permitting
842 certain development projects in unincorporated areas.

843 Well Permitting

844 Water wells are permitted through a ministerial process following the Sonoma County Well
845 Ordinance, most recently updated by Permit Sonoma in 2015, that contains regulations and
846 requirements for constructing wells to prevent groundwater contamination from the
847 surface, and between multiple water bearing zones in (Ordinance 25B). The ordinance
848 includes standards for well construction, abandonment, destruction, setbacks, prohibitions,
849 and water treatment for contaminated wells. It also addresses permit requirements,
850 inspections, reporting, enforcement provisions, and alternate construction methods. The
851 well construction standard does not regulate flow volumes or rates, nor does it evaluate
852 water availability or local hydrogeology.

853
854 Additionally, the County commissioned a pilot study of ~~three~~³ areas it determined to have
855 relatively scarce groundwater in other areas of the County. The study examined climate,
856 land use and the depths of wells drilled over time (Kleinfelder, 2003). Based on this pilot
857 study, Permit Sonoma established countywide permit requirements and guidelines for
858 performing pump tests on new water-wells in water scarce areas. The study also
859 recommended further studies of these water scarce areas.

860
861 Sonoma County municipal code water well requirements are available on the web at:
862 [https://library.municode.com/ca/sonoma_county/codes/code_of_ordinances?nodeId=CH2](https://library.municode.com/ca/sonoma_county/codes/code_of_ordinances?nodeId=CH25BWAWECOST)
863 [5BWAWECOST](https://library.municode.com/ca/sonoma_county/codes/code_of_ordinances?nodeId=CH25BWAWECOST) and the Groundwater Availability Map is located at: [http://www.sonoma-](http://www.sonoma-county.org/prmd/gisdata/pdfs/grndwater_avail_b_size.pdf)
864 [county.org/prmd/gisdata/pdfs/grndwater avail b size.pdf](http://www.sonoma-county.org/prmd/gisdata/pdfs/grndwater_avail_b_size.pdf)

865 Project Permitting

866 Permit Sonoma reviews all development proposals within unincorporated areas that will
867 rely on wells for water supply, including wineries, subdivision and cannabis permits.
868 Permits for agricultural development projects are processed through the Sonoma County
869 Agricultural Commissioner. Permit Sonoma uses a four-tier groundwater classification
870 system map, based on geologic information and water yields, to designate general areas of
871

872 groundwater availability (**Figure 2-9**), for reviewing certain development and building
873 permit applications. Class 1 areas are Major Groundwater Basins; Class 2 areas are Major
874 Natural Recharge Areas; Class 3 areas are Marginal Groundwater Availability Areas; and
875 Class 4 areas are Areas with Low or Highly Variable Water Yield. The Class 1 and Class 2
876 groundwater availability areas generally correlate, but do not completely correspond, with
877 DWR's Bulletin 118 basin boundaries.

878
879 Discretionary applications in Class 3 and 4 areas and in SGMA medium and high priority
880 basin, including the Petaluma Valley Basin, are required to include hydrogeologic reports to
881 establish that groundwater quality and quantity are adequate and will not be adversely
882 impacted by the cumulative developments and uses allowed in the area. In addition,
883 discretionary applications in Class 4 areas are required to complete an aquifer pumping
884 test to establish the availability of an adequate water supply. The aim is to avoid causing or
885 exacerbating an overdraft condition in a groundwater basin or Basin.

886
887 Since 2004, Permit Sonoma has required groundwater-level measurement and volume
888 reporting from water wells on a quarterly or monthly basis as standard conditions of
889 approval for commercial and industrial projects requiring a use permit, and using more
890 than 0.5 afy of water. Projects in southern Petaluma Valley are also generally required to
891 perform and report water quality monitoring due to concerns with elevated salinity in that
892 area. For projects where significant impacts are identified, Permit Sonoma may require
893 demonstration of zero or de minimis net water use through onsite water conservation,
894 rainwater or surface water storage, groundwater recharge, and/or offsite mitigation.

895 **2.8 Additional GSP Elements (Reg. 354.8 (g))**

896
897
898 **The GSP Regulations require that the Plan Area section include a description of any of the**
899 **additional GSP elements from Water Code 1027.4 that the GSA determines to be**
900 **appropriate. It is anticipated that many, if not all of the below elements will be**
901 **addressed in subsequent sections of the GSP. Once those sections are complete, this**
902 **section will be updated to indicate where the specific descriptions are located. The**
903 **additional GSP elements listed in Water Code 1027.4 are:**

- 904
905 (a) Control of saline water intrusion.
- 906 (b) Wellhead protection areas and recharge areas.
- 907 (c) Migration of contaminated groundwater.
- 908 (d) A well abandonment and well destruction program.
- 909 (e) Replenishment of groundwater extractions.
- 910 (f) Activities implementing, opportunities for, and removing impediments to,
- 911 conjunctive use or underground storage.
- 912 (g) Well construction policies.

913 (h) Measures addressing groundwater contamination cleanup, groundwater recharge,
914 in-lieu use, diversions to storage, conservation, water recycling, conveyance, and
915 extraction projects.

916 (i) Efficient water management practices, as defined in Section 10902, for the delivery
917 of water and water conservation methods to improve the efficiency of water use.

918 (j) Efforts to develop relationships with state and federal regulatory agencies.

919 (k) Processes to review land use plans and efforts to coordinate with land use planning
920 agencies to assess activities that potentially create risks to groundwater quality or
921 quantity.

922 (l) Impacts on groundwater dependent ecosystems.

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927

Working Draft

Petaluma Valley Advisory Committee Comment Tracking					
Section	Location	Commentor	Nature of comment	Comment	Response
Table of Contents	9	AC	grammatical	Correct TOC line numbers	
1.0 Introduction	59	AC	grammatical	"paths" (not path)	
	39-40	ADuBay	grammatical	(SGMA), which that	
	39-40			To satisfy the requirements of SGMA, local agencies generally must do the following: Satisfying the requirements of SGMA generally involves four basic activities be completed by local agencies: "Form" Develop" Implement Regularly report	
1.2 Administrative Information	104			The Petaluma Valley GSA has an agreement with Sonoma Water for technical support; public outreach and community engagement; grant writing; and GSA administrative support; and with the Sonoma RCD for monitoring services. <i>(Use semi-colons for this list)</i>	
	111	ADuBay	grammatical	The Petaluma Valley GSA formed an Advisory Committee of 10 members with consisting of appointment of five at-large members appointed by the five member agencies, and five interest-based members appointed by the Petaluma Valley GSA Board:	
	143	ADuBay	grammatical	Zip code is 95403 (not 95406)	
2.0 Description of Plan Area					
2.1 General Setting and Jurisdictional Areas	209	ADuBay	grammatical	Petaluma Marsh Wildlife Area	
				Other protected lands located within the Basin and contributing watershed areas and shown on (Figure 2-3)	
	220	Cthompson	grammatical	In 2014, the State of California enacted the Sustainable Groundwater Management, including in the Petaluma Valley	
2.2 Topography and Geography					
2.3 Surface Water and Drainage Features					
2.4 General Land Use Characteristics					
2.5 Water Source Types and Water Use Sectors					
2.6 Existing Monitoring Programs and Networks	298	ADuBay	grammatical	Historically, this has included approximately twenty four 24 wells and currently includes thirteen 13 wells which are privately owned wells monitored through voluntary agreements with DWR. <i>(NOTE: 10 and above use numerals; less than 10 are spelled out)</i>	
	325	ADuBay	grammatical	0.5 acre feet yearly (afy)	
	393	Cthompson	editorial	I don't believe there is an active USGS stream gauge on the Petaluma River. There was one at Copeland but it has been inactive since October 2016.	
	398	Cthompson	grammatical	There is no Figure 2-7b, there are two Figures labeled 2-7c.	

2.7 Existing Management Programs and Studies	435	ADuBay	editorial	2018 or 2019??	
	478	Cthompson	grammatical	IRMWP, change to IRWMP	
	542	Cthompson	editorial	Signatories to California Water Efficiency Partnership (CalWEP), no longer to CUWCC.	
2.8 General Plan and Related Plan Land Use Categories					
2.9 Well Permitting Policies and Procedures	852	ADuBay	grammatical	a pilot study of 3 three areas	
2.10 Additional GSP Elements					
General	Figure 2.5	AC	editorial	In legend for City of Petaluma, add comma after imported water or reword Also, clarify what is identified as irrigated, because most is vineyard. For RW parcels, most water received is SW, not GW	
	Figure 2.3	AC	editorial	Add North Bay Water District (NBWD) to the figure of jurisdictional and protected areas map)	
			editorial	For boundary lines, why didn't we pick the top of San Antoinio Creek as the boundary, rather than the Marin County line?	