

WATER AVAILABILITY ANALYSIS

Policy Report
August 2007

Introduction:

At the height of the 1990 drought in Napa County, the Napa County Board of Supervisors and the Napa County Planning Commission became very concerned with the approval of use permits and parcel division that would cause an increased demand on groundwater supplies within Napa County. During several Commission hearings, conflicting testimony was entered as to the impact of such groundwater extraction on water levels in neighboring wells. The Commission asked the Department of Public Works to evaluate what potential impact an approval might have on neighboring wells and on the basin as a whole. In order to simplify a very complex analysis, the Department developed a three phase water availability analysis to provide a cost-effective answer to the question.

On March 6, 1991, an interim policy was presented and approved by the Commission which requires the applicants for use permits and parcel divisions to submit a water availability analysis with their proposal. The staff report that provides the procedure to follow for compliance with the Commission policy was intended to be an interim one. With the passage on August 3, 1999 by the Board of Supervisors of Napa County Ordinance #1162 (the Groundwater Conservation Ordinance) it became apparent that the interim policy required updating and formalization. The purpose of the revised report is to provide the procedure for preparation of water availability analysis and to restate the purpose and functionality of the analysis as related to the revised Groundwater Ordinance (Napa County Ordinance # 1162).

Water Availability Analysis:

The Water Availability Analysis (WAA) sets up guidelines to determine if a proposed project will have an adverse impact on the groundwater basin as a whole or on the water levels of neighboring wells with the overriding benefit of helping to manage groundwater resources. An important sidelight to the process is public education and awareness. WAA's are comprised of potentially three phases; phase one, phase two and phase three.

A **phase one analysis** is a reconnaissance level report that may be prepared by the applicant or their agent. **It must be signed by the applicant. If prepared by the applicant's agent, it must contain the letterhead of the agent, the name of the agent, and the agent's signature.** The phase one WAA contains the following information:

1. The name and contact information of the property owner and the person preparing the phase one report.
2. Site map of the project parcel and adjoining parcels. The map should include: Assessor's Parcel Number (APN), parcel size in acres, location of project well(s) and other water sources, general layout of structures on the subject parcel, location of agricultural development and general location within the county.
3. Narrative on the nature of the proposed project including: all land uses on the subject parcel, potential for future water uses, details of operations related to water use, description of interconnecting plumbing between the various water sources and any other pertinent information.
4. Tabulation of existing water use compared to projected water use for all land uses contained on the parcel. Should the water use extend to other parcels, they should be included in the analysis (see Appendix E for additional information on determining fair share estimates when multiple parcels are involved). **These estimates should reflect the specific requirements of the applicant's operations.** The applicant should use the guidelines attached in Appendix A

The Department will review the analysis for completeness and reasonableness (based on the guidelines outlined in Appendix A) and then compare the analysis to a threshold level of groundwater use for the subject parcel. The threshold is based upon several factors including annual rainfall, topography, soil types, proximity to recharge zones and available groundwater information. In general, parcels located on the Valley Floor or in strong alluvial areas will be assigned a threshold of 1 acre-foot per acre of land (an acre-foot of water is the amount of water it takes to cover one acre of land to a depth of one foot, or 325,851 gallons). Therefore, a 40-acre parcel will have an acceptable level of groundwater use of 40 acre-feet per year. The threshold for Hillside parcels (primarily located in volcanic rock and soils) is 0.5 acre-feet per acre or 20 acre-feet per year for a 40-acre parcel. Areas designated as "Groundwater Deficient Areas" as defined in the Groundwater Conservation Ordinance will have threshold established for that specific area. For example, the Milliken-Sarco-Tulocay Basin (M-S-T) is currently the only "groundwater deficient area" and has an established threshold of 0.3 acre-feet per acre per year. Thus, the same 40-acre parcel has an acceptable level of water use of 12 acre-feet per year (see Appendix B).

If the Phase I analysis shows a water use above the parcel threshold then further analysis may be required in the form of a Phase II or Phase III analysis.

In instances where the applicant is in the M-S-T basin and their estimated future water usage will be significantly less than the values listed in Appendix A, or if the estimate is within 50% of the estimated threshold, the County may require the applicant to install a water meter to verify actual groundwater usage. If the actual usage exceeds the parcel's threshold, applicant may be required to reduce groundwater consumption and/or find

alternate water sources to ensure that no more groundwater is consumed than the threshold for the parcel(s) (See Appendix D).

In the M-S-T basin a phase one analysis examines only the estimated quantity of groundwater water usage as compared to the established water usage threshold. It is assumed that if all consumers within the MST basin were to limit their consumption to 0.3 acre-feet per acre per year* there will be sufficient groundwater for all properties within that area.

* Does not apply to the Ministerial Exemption as outlined in the Groundwater Conservation Ordinance

Any new project within the M-S-T Basin whose estimated use exceeds the threshold use will likely be recommended for denial to the County Department requesting review of the application.

For projects in all other areas within Napa County whose estimated water use exceeds the threshold, the applicant will be required to conduct either a **phase two or a phase three analysis (or both)**.

The phase two analysis is commonly called an aquifer test or well test. It requires the pumping of the project well(s) at the maximum rate needed to meet project water demands and at the same time requires the monitoring of the immediate effects of groundwater pumping on a neighboring or monitoring well(s). The following requirements must be met when performing a phase two analysis:

- An approved hydrogeologist, a list of which is on file with the Department of Public Works, must develop the test procedure. Upon approval of test procedures, the hydrologist will supervise the test and submit a report to the Department evaluating impacts to neighboring static water levels.
- A licensed well drilling contractor must perform the actual testing and monitor static and dynamic water levels of the project well and monitoring wells during the duration of the test, including the recovery phase of the project well and monitoring wells.
- The test must be conducted long enough to stabilize the dynamic water level of the project well or include an analysis of what the impact* of continued pumping would have.
- The applicant or agent must notify the Department at least 48 hours prior to conducting the test.

* Impact is unique to each project and will be evaluated on a case by case basis by the department of public works.

Any projects requiring a phase two analysis may also be required to install water meters to measure the actual amount of water consumed, and be required to find alternate

water sources if their actual groundwater usage exceeds the threshold for their property (see Appendix D).

The Department will review the phase two analysis and determine if the impacts to static water levels of neighboring wells are within acceptable limits. If the phase two is unacceptable, a **phase three analysis** is required. The phase three analysis may include many measures aimed at reducing water consumption and/or the maximum pumping rate. The Department will require periodic monitoring of static water levels with annual submittals of well production and static water level reports.

The phase three analysis only determines possible actions which could be taken to moderate the immediate effects of groundwater pumping to neighboring wells. These mitigation measures will be designed to reduce, but may not eliminate, the immediate effects of groundwater pumping to neighboring wells.

The preparation and submittal of WAA's for all use permits and parcel divisions, as well as for all Groundwater Conservation Ordinance permits must be submitted through the normal procedures for the Conservation, Development and Planning Department (CDPD) and the Department of Environmental management (DEM) respectively. All subsequent communication should likewise pass through CDPD or DEM. Any mitigation measures identified in the phase three analysis will become either project modifications to, or conditions of approval for, the proposed project.

Details of the use permit or land division can be obtained from CDPD and details of the Groundwater Ordinance and related permit process can be obtained from the Department of Environmental Management. Mapping of "Groundwater Deficient Areas" is available at all three Departments with final determination being supplied by the Department of Public Works.

Conclusions:

The Napa County Board of Supervisors has long been committed to the preservation of groundwater for agriculture and rural residential uses within the County. It is their belief that through proper management, the excellent groundwater resources found within the county can be sustained for future generations.

Since 1991, several conclusions can be drawn from application of the water availability analysis process:

- In the process of conducting the analysis, applicants become much more aware of water use for their project, providing a higher level of awareness and potentially leading to more efficient use of the resource.
- Information submitted by applicants has lead to a broader database for future study and management.

- Groundwater use can vary widely depending upon its availability.
- The current practice of evaluating an applicant's Phase I WAA to determine if additional analysis is needed has been the accepted method for making groundwater determinations. Due to the limited information available on Napa County groundwater basins in general (with the exception of the MST basin), the Phase 1 WAA has been the most reasonable approach to the process and has not been shown to be inaccurate or inadequate. As such, the established WAA procedures for making groundwater determinations as outlined above and throughout the Appendices will continue to be the accepted method of making groundwater determinations and findings.

The water availability analysis is based upon the basic premise that each landowner has equal right to the groundwater resource below his or her property. By attempting to limit the extraction to a threshold amount, it is believed that sufficient groundwater will be available for both current and future property owners.

APPENDIX A: Estimated Water Use for Specified Land Use

Guidelines for Estimating Residential Water Use-For use with the Phase I Form

The typical water use associated with residential buildings is as follows:

Primary Residence	0.5 to 0.75 acre-feet per year (includes minor to moderate landscaping)
Secondary Residence	0.20 to 0.50 acre-feet per year
Farm Labor Dwelling	0.06 to 0.10 acre-feet per person per year

Additional Usage to Be Added

1. Add an additional 0.1 acre-feet of water for each additional 1000 square feet of drought tolerant lawn or 2000 square feet of non-xeriscape landscaping above the first 1000 square feet.
2. Add an additional 0.05 acre-feet of water for a pool with a pool cover.
3. Add an additional 0.1 acre-feet of water for a pool without a cover.

Residential water use can be estimated using the typical water uses above. All typical uses are dependant on the type of fixtures and appliances, the amount and type of landscaping, and the number of people living onsite. If a residence uses low-flow fixtures and has appliances installed, is using xeriscape landscaping, and is occupied by two people, the water use estimates will be on the low side of the ranges listed above.

Examples of Residential Water Usage:

Residential water use can vary dramatically from house to house depending on the number of occupants, the number and type of appliances and water fixtures, the amount and types of lawn and landscaping. Two homes sitting side by side on the same block can consume dramatically different quantities of water.

Example1:

Home #1 is 2500 square feet. Outside the house there is an extensive bluegrass lawn, a lot of water loving landscaping, a swimming pool with no pool cover. Inside the house all the appliances and fixtures, including toilets and shower-heads, are old and have not been upgraded or replaced by water saving types. The owners wash their cars weekly but they don't have nozzles or sprayers on the hose. They do not shut off the water while they are soaping up the vehicles, allowing the water to run across the ground instead. Water is commonly used as a broom to wash off the driveways, walkways, patio, and other areas. The estimated water usage for Home #1 is 1.2 acre-feet of water per year.

Example2:

Home #2 is also 2500 square feet. Outside of the house there is a small lawn of drought tolerant turf, extensive usage of xeriscape landscaping, and no swimming pool. Inside the house all of the appliances and fixtures, including toilets and showerheads, are of the low flow water saving types. The owners wash their cars weekly, but have nozzles or sprayers on the hose to shut off the water while they are soaping up the vehicles. Driveways, walkways, patios, and other areas are swept with brooms instead of washed down with water. Estimated water usage for Home #2 is 0.5 acre-feet of water per year.

The above are only examples of unique situations. The estimated water use for each project will vary depending on existing parcel conditions.

Guidelines For Estimating Non-Residential Water Usage:

Agricultural:

Vineyards	
Irrigation only	0.2 to 0.5 acre-feet per acre per year
Heat Protection	0.25 acre feet per acre per year
Frost Protection	0.25 acre feet per acre per year
Farm Labor Dwelling	0.06 to 0.10 acre-feet per person per year
Irrigated Pasture	4.0 acre-feet per acre per year
Orchards	4.0 acre-feet per acre per year
Livestock (sheep or cows)	0.01 acre-feet per acre per year

Winery:

Process Water	2.15 acre-feet per 100,000 gal. of wine
Domestic and Landscaping	0.50 acre-feet per 100,000 gal. of wine

Industrial:

Food Processing	31.0 acre-feet per employee per year
Printing/Publishing	0.60 acre-feet per employee per year

Commercial:

Office Space	0.01 acre-feet per employee per year
Warehouse	0.05 acre-feet per employee per year

Parcel Location Factors:

The allotment of water for each parcel is based on the location of the parcel. There are three different location classifications. Valley Floor, Hillside and Groundwater Deficient Areas. Valley Floor areas include all locations that are within the Napa Valley and the Carneros Region except for areas specified as groundwater deficient areas. Groundwater Deficient areas are areas that have been determined by the Department of Public Works as having a history of problems with groundwater. The only Groundwater Deficient Basin in Napa County is the MST basin. All other areas are

classified as Hillside Areas. Public Works can assist you in determining your classification.

Parcel Location Factors

Valley Floor	1.0 acre feet per acre per year
Hillside Areas	0.5 acre feet per acre per year
MST Groundwater Deficient Area	0.3 acre feet per acre per year*

* Does not apply to the Ministerial Exemption as outlined in the Groundwater Conservation Ordinance

The threshold for the Valley Floor Area was determined in 1991 in the form of a Staff Report to the Board of Supervisors. The value of 1.0 AF/A/Year was established as the typical water demand of a vineyard. It was noted that the Valley Floor threshold would have relatively little effect on neighboring wells.

The threshold for the Mountain Area was established due to the uncertainty of the geology, and the increasingly fractured aquifer in the mountainous and non-Napa Valley areas including Carneros, Pope Valley, Wooden Valley, and Capell Valley.

The threshold for the Groundwater Deficient Areas was determined using data from the 1977 USGS report on the Hydrology of the Milliken Sarco Tulocay region. The value is calculated by dividing the “safe annual yield” (as determined by the USGS study of 1977) by the total acreage of the affected area (10,000 acres).

APPENDIX B: Values Used to Establish Thresholds

Average Annual Rainfall (Source: Napa County Road & Streets Standards):

American Canyon	1.5 feet per year
City of Napa	2.0 feet per year
Yountville	2.5 feet per year
Oakville	2.5 feet per year
Rutherford	2.67 feet per year
St. Helena	2.75 feet per year
Calistoga	3.0 feet per year
Western Hills	increase by 20%
Eastern Hills	increase by 10%

Threshold Factors of Acceptable Water Use:

Valley Floor	1.0 acre-foot per acre
Hillsides	0.5 acre-foot per acre
MST Groundwater Deficient Areas	0.3 acre-foot per acre*

* Does not apply to the Ministerial Exemption as outlined in the Groundwater Conservation Ordinance

APPENDIX C: Guidance for M-S-T Basin Permit Applications

Data collected from the monitoring of wells within the M-S-T Basin over the last forty years indicate that it may be in overdraft, leading to the conclusion that the existing water users within the basin are pumping more water from the ground than is being naturally replaced each winter season. The only way to end the overdraft trend is to cease all water extraction from the basin. However, as no other reasonable water resources exist in the M-S-T, the Department, to avoid a ban on all new construction, has assumed that each property owner should be able to develop their property to a “reasonable” level of water use while reducing the rate at which the groundwater levels are being lowered.

Within the near future, the U.S.G.S. will release a report on a recent study of the M-S-T Basin. From the U.S.G.S. report we will be able to determine to what extent the overdraft condition may exist and infer what problems may occur from the continued extraction of groundwater from the Basin. Results of the study will be used to plan for alternatives to address these problems. Until the report is available, and alternative measures can be implemented, the Department will use the following analysis to evaluate impacts from proposed projects in the M-S-T Basin:

Single Family Dwellings on Small Parcels In the M-S-T Basin: The average, single family dwelling will likely use between 0.5 and 0.75 acre-feet of groundwater per year. Using a threshold of 0.3 acre-ft/year/acre, the minimum parcel size able to support the above range is between 1.5 to 2.5 acres. Therefore, if an existing residence that uses 0.5 acre-feet per year of groundwater is located on a one-acre parcel, it already exceeds the acceptable level of water use for the property. Applications for the construction of a single family home in these instances can be approved ministerially if the owner agrees to the conditions outlined in the Groundwater Ordinance. If the conditions are not agreed upon, or if the project involves a secondary dwelling or other groundwater uses not consistent with a single family dwelling, then the project would be subject to the complete groundwater permit process including but not limited to the submittal of a Phase 1 analysis detailing all water use, existing and proposed, on the project parcel.

Agricultural Development In the M-S-T Basin: Agriculture in the M-S-T Basin is not exempt from the groundwater permit process. In these cases, such development will require an application for a groundwater permit including a phase one analysis detailing the existing and proposed water use(s) on the project parcel(s). It is likely that all agricultural development in the M-S-T will be required to meter all wells supplying water to the property with periodic reports to the Department.

Existing Vineyard, New Primary or Secondary Residence In the M-S-T Basin: On an application related to a new residence on a parcel with an existing vineyard or residence, the Phase 1 WAA shall include all water use on the property, both existing and proposed. Projects on parcels with an established vineyard will likely be required to meter all wells supplying water to the property with periodic reports to the Department.

Wineries and Other Use Permits In the M-S-T Basin: On an application for a use permit, the applicant is required to provide a phase one analysis. Should the application be approved, a specific condition of approval will be required to meter all wells supplying groundwater to the property with periodic reports to the Department. It is also possible that water conservation measures will be a condition of approval. All new use permits must meet the threshold water use for the project parcel.

APPENDIX D: Water Meters

If required, water meters shall measure all groundwater used on the parcel. Additional meters may also be required for monitoring the water use of individual facilities or operations, such as a winery, residence, or vineyard located on the same parcel. If a meter(s) is installed, the applicant shall read the meter(s) and provide the readings to the County Engineer at a frequency determined by the County Engineer. The applicant shall also convey to the County Engineer, or his designated representative, the right to access and verify the operation and reading of the meter(s) at any time.

If the meters indicate that the water consumption of a parcel in the M-S-T basin exceeds the fair share amount, the applicant will be required to submit a plan which will be approved by the Director of Public Works to reduce water usage. The applicant may be required to find additional sources of water to reduce their groundwater usage. Additional sources may include using water provided by the City of Napa, the installation of water tanks which are filled by water trucks, or other means which will ensure that the groundwater usage will not exceed the fair share amounts.

The readings from water meters may also be used to assist the County in determining trends in groundwater usage, adjusting baseline water use estimates, and estimating overall groundwater usage in the M-S-T basin.

Appendix E: Determining water use numbers with multiple parcels

The water availability analysis is based on the premise that each landowner has equal right to the groundwater resource below his or her property. There will be cases where one person or entity owns multiple parcels and requests that the total water allotment below all of his or her parcels be considered in the Phase I water availability analysis. Determining the total threshold based on multiple parcels is acceptable, however to protect future property owners, certain safeguards must be in place to ensure that the water allotment and transfer between parcels is clearly documented and recorded, especially in cases where the water from more than one parcel will ultimately serve a use on a single parcel.

When multiple parcels are involved, the parcels for which the total threshold is being based on must be clearly identified on a site plan with assessors parcel numbers noted. The transfer of water from these parcels to the parcel on which the requested use is located must be documented using the form provided by the department of public works. The form must be approved by the County and subsequently recorded by the applicant prior to commencement of any activity authorized by the groundwater permit or other county permit or approval. A condition requiring such will be placed on the use permit, groundwater permit or other permit for approval.

Alternatively, if the method above is not feasible, the applicant may provide a Phase One Analysis for each project parcel, with the understanding that the water use on each

individual parcel must not exceed the fair share for that parcel (and or the existing use if the parcel is in the MST groundwater deficient basin).

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