

Groundwater Sustainability An Agricultural Proposal

The California Legislature adopted the Sustainable Groundwater Management Act in 2014 (SGMA). SGMA provides for local approved entities to form a Groundwater Sustainability Agency (GSA) and to create a Groundwater Sustainability Plan (GSP) to guide and govern areas for managing groundwater sustainability. Within Sonoma County three GSAs currently exist: the Santa Rosa Plain, the Petaluma Valley and the Sonoma Valley GSA. Three additional basins within Sonoma County are proposed for elevation in prioritization: Alexander Valley, Dry Creek Valley, and Wilson Grove. If proposed prioritization is finalized, the formation of three additional GSAs would be required.

Additionally, the California Department of Water Resources (DWR) recognizes that recharge on active farmlands can yield positive benefits to groundwater sustainability. DWR has proposed Flood-MAR, flooding working landscapes (e.g. farmlands) to provide managed aquifer recharge, as a tool to help areas achieve groundwater sustainability as well as for “flood protection, drought preparedness, aquifer remediation, and ecosystem restoration”.¹ In that same request, DWR offered to work with landowners and GSA’s to “determine opportunities to implement managed groundwater recharge projects that use excess flood flows as the source water.”

Consistent with SGMA’s intent, and DWR’s recognition of the value of working landscapes to achieving groundwater sustainability, the undersigned agriculture interests send this letter as notice that the agriculture community is taking significant and **proactive** steps to assist in management of groundwater in Sonoma County.

One significant step taken by agriculture interests in furthering Sonoma County’s sustainable groundwater management efforts includes petitioning the Local Agency Formation Commissions (LAFCO) to form the Sonoma On-Farm Conservation and Recharge Water District (Water District). This independent Water District will provide services to monitor, manage, protect and recharge groundwater in designated agriculture areas within Sonoma County. Further, approval of this Water District is anticipated to provide an efficient and cost-effective system for the delivery of services related to collection and management of data to inform groundwater levels and its relationship to agriculture use, and the development of a Groundwater Sustainability Plan.

We take these additional steps as acknowledgment of the following:

- 1) Compliance with SGMA will require the cooperation of agriculture as they are a significant source of extraction but more importantly, have the ability to provide opportunity for recharge of the aquifers.

¹ https://water.ca.gov/-/media/DWR-DSIWM-SIIB-Website-Files/Flood-MAR-White-Paper-Documents/Flood-MAR_Discussion-Draft_Nov-2017.pdf

- 2) The Santa Rosa Plain Basin is fortunate to have already undertaken considerable study and has in hand a Santa Rosa Plain Watershed Groundwater Management Plan that contains a large percentage of the required information for compliance with SGMA.
- 3) The Petaluma Valley Basin is fortunate to have comprehensive and long-term studies provided by the USGS that documents negligible groundwater changes over time indicating the Basin is in equilibrium.
- 4) The Alexander Valley Area Basin and the Santa Rosa Plain, Healdsburg Area Sub-basin (Dry Creek Valley) both have substantial data indicating there is no overdraft of the aquifer.
- 5) The agricultural community with its culture of efficiency and management of resources along with financial prudence, driven by slim margins, are positioned to produce documents and information quickly unburdened by bureaucracy.
- 6) Any discussion of financing needs to fully understand the extent of the problem and the cost of solution before assessing property owners.

We are already taking the following steps:

- 1) A network of wells is being established utilizing accepted technology to monitor groundwater levels and the interaction between wells and aquifers to confirm modeling by the USGS.
- 2) A review of the data of the Santa Rosa Plain Watershed Groundwater Management Plan has been undertaken and we have identified substantial compliance with the Basin Setting identified in SGMA.
- 3) We have undertaken one study of the recharge nature of vineyards over the past year with additional studies being prepared.
- 4) We will form an organization, initially independent of the Water District, to collect and report agricultural groundwater data modeled after the successful efforts of the County and growers to comply with the State's Russian River Frost Regulation. Similar to a frost "water demand management program" the groundwater organization would prepare an inventory of agricultural groundwater producers and wells ("inventory") for each medium or high priority basin in the County, prepare an assessment of groundwater conditions (akin to "stream stage monitoring"), assess whether groundwater production adversely affects groundwater elevations or causes any other impacts ("risk assessment"), and identify any management actions to address impacts ("corrective actions"). The groundwater organization would also respond to agency requests for focused groundwater monitoring. Like the frost program, the groundwater organization would be funded by agricultural producers.

Each Basin presents its own challenges and we feel agriculture is positioned to assist in each:

Existing GSAs and Related Basins

- 1) Santa Rosa Plain Basin
 - a. Agricultural groundwater users have taken steps to establish a network of wells monitoring groundwater in real time in both shallow and deep aquifers.
 - b. The focus of the proposed Water District is centered in this Basin and positioned to provide well monitoring and funding recharge projects.

- c. Discussions are being conducted with water engineering firms to cross match elements of the adopted Santa Rosa Plain Watershed Groundwater Management Plan and the requirements of the Sustainable Groundwater Plan mandated by SGMA to identify any additional documentation needed.
- 2) Petaluma Valley Basin
- a. Agricultural groundwater users have taken steps to establish a network of wells monitoring groundwater in real time in both shallow and deep aquifers.
 - b. The Water District is positioned to expand into this Basin allowing annexation of willing property owners.
 - c. Data provided by USGS indicate an insignificant potential overdraft that can be easily addressed with many of the same steps in the Santa Rosa Plain Watershed Groundwater Management Plan.
- 3) Sonoma Valley Basin
- a. Agricultural groundwater users have taken steps to establish a network of wells to monitor groundwater within this Basin.
 - b. This unique Basin has documented, isolated incidents of salt intrusion. The proposed Water District will collect data to understand opportunities for utilizing groundwater recharge to reverse those trends.
 - c. The funding proposed for a Sonoma Valley Groundwater Sustainability Plan (“GSP”) is best directed to recharge projects designed to reverse the only impact from historic groundwater extraction, similar to the SCWA’s pilot injection project.
 - d. Agricultural producers will provide funding and direction to on-farm recharge and other groundwater management projects.

Additional Proposed Basins

- 4) Alexander Valley
- a. This Basin is fortunate to have considerable documentation of sustainable groundwater and is able to follow the path of Napa by filing an “Alternative” to a GSP (also known as an “Alternative Plan”) allowed under SGMA. An Alternative may be submitted where an analysis of basin conditions demonstrates that the basin has operated within its sustainable yield over a period of at least 10 years.
- 5) Dry Creek Valley
- a. Like the Alexander Valley Basin, an “Alternative” should be filed for this Basin.
- 6) Wilson Grove
- a. This Basin presents challenges with its high percentage of residential wells that would fall into the category of “de-Minimis” users that are exempt from metering under SGMA authorities, complicating compliance with SGMA. While the County has legal authorities in addition to SGMA to regulate residential wells, the County Board of Supervisors will require the cooperation of agriculture, which has better capabilities to assess basin conditions than residential users, to study the basin and adopt an appropriate management program.

Groundwater availability and potential solutions for sustainability will significantly impact agricultural water users and Sonoma County’s ability to create and implement an efficacious GSP. Agriculture

producers recognize sustainable agriculture requires sustainable groundwater and believe that collectively we can significantly contribute to achieving SGMA's goals.

It is our intent to make a positive contribution to the process and the sustainable management of groundwater in all the basins in which agriculture has a presence.

Thank you.

Sonoma Alliance for Vineyards & Environment
Sonoma County Farm Bureau
North Bay Water District