

Fred Allebach

GSP chapter comments as pertaining to fee study and PMAs

2/28/22

Water Budget chapter p. 82

3.4.4.6

“Changes in the projected water budgets compared with the historic and current water budgets reflect assumptions about future population growth, land use, and climate. These assumptions reflect the best information currently available.”

-I think realistically these assumptions are not the “best info available” but, particularly for ag stakeholders, rather reflect the aspirations for a business as usual future, that the GSP then caters to with PMAs that increase supply rather than suggest demand reduction overall may be a worthy strategy too

-this gets back to deep primary assumptions about the need for growth in finite systems, that is fundamentally, scientifically unrealistic, and thus, at the end of the day, the GSP ends up being “enabling management criteria”, not sustainable, bc SGMA does not require actual sustainability bc of political limitations; SGMA splits the diff between resource conservation and people who can't limit themselves bc they think they need to grow to be healthy; SGMA tries to finesse a middle ground between S-curve carrying capacity and J-curve growth and crash, with the basic cure being tech salvation PMAs of water supply increases

-recall one recent GRA take home point: GSAs are more wanting to increase supply and keep up normal use when in reality, demand reduction is written all over the wall in water-uncertain California, with a -400 af per year projected rate of deficit, my summary for SV GW sustainable yield would have red flags up for conservation and reduced use: the more straws, the less per straw

SMC chapter

p. 7

-I suggest changing the Sustainability Goal to “The goal of this GSP is to adaptively and sustainably manage, protect and enhance groundwater resources **to allow for reasonable groundwater management through:**”

-I took out “growth” bc in the management of an increasingly scare common pool resource, the emphasis should be on rational management, not continuing to grow against all reason. This is like saying fisheries, timber, and grazing should all be able to grow when in fact, sustainable now is about being more careful and more people using less each. The “growth” assumption is outdated and unsustainable, “sustainable yield” means each having to get by with less.

-Fred's one liner for the GSP: “more people with straws in GW have to use less water each”

upshot of my comments here: the GSP is acknowledging the reality of limits if there are not projects to increase supply; here is an opportunity to frame “the story” as one of SMCs needing

to put limits on demand; demand can only be increased if there are augmentations to supply; if reductions to pumping (SMCs) need to be put in place to protect all existing beneficial users, then only by increasing supply can more demand be met
-increasing supply is hard to come by in California

Domestic land uses and users

Given that @ 30% of basin GW use is rural residential, yet no serious regime of limits seems to be in play for this group, an unregulated 30% of use seems problematic to me; relying on voluntary measures should not go on for too long

PMAs chapter

p. 6

“existing levels of conservation”

-what’s being talked about in Group 1 here is replacement tech that props up current use, not actual conservation or consciously using less GW; this tech salvation (low flow devices etc) approach could result in a Jevon’s Paradox, where everyone moves to the new tech, and then the overall use goes up bc people feel like they have a get out of jail free card and are conserving and doing good

-an actual use-less-GW message might be good too: like get rid of high water use landscape irrigation, as landscape irrigation is a top rural residential use

-figure out how to actually conserve and cut back instead of messaging and tech that allows a sense of not really having to sacrifice

p. 7

“assess Subbasin conditions that may lead to mandatory implementation of water-use efficiency projects”

-I think people need to get the message that flat out conserving and using less GW is called for too; if people think a program of low flow shower heads etc is a fix, then they won’t get the message to just plain use less

-there has to be a conservation will and awareness, not just a tech fix

p. 17

“. The GSA believes that the current level of Subbasin pumping can be continued with the effective implementation of the projects and management actions described above.

-so, the GSA is planning to keep business as usual? No sacrifice from the user end? No demand reduction only supply enhancement?

-or maybe this says that the current level is the ceiling and all new users or increasing uses will result in a situation where all straws just have to get less?

GSP Chapter 7

-General Comment: in some respects, the whole GSP seems biased and bending over backwards to not offend ag interests; this includes minimizing conservation and demand reduction, and to not appear to be too strict for other beneficial uses like the environment; I can understand that posture is important, to not alienate the Alpha beneficial user, at the same time, the GSA and GSP should not give the impression that through tech fixes, business as usual is OK; as Jim Bundschu said once, *some limits are expected just give ag a clear number they will have to adjust to*; or is the GSA prepared to say that “things are really not that bad here, everybody relax”

7.2.6

Implementation of Group 1 Projects

-don't forget conservation also means conscious demand reduction, not just keeping our same behavior but switching the water-use tech; in sustainability studies, that you can get a PhD in, one possible future hinges on keeping the growth paradigm but with green tech replacements, this is the tech optimist future, we can invent our way out, adapt through more tech without really changing our appetites

-another possible future is based on de-growth, getting to an S-curve carrying capacity, a steady-state economy, CONSERVATION, and all at a much more local level.

-Then we have a BAU future, business as usual, no changes, and collapse as another option

-with water in CA, scarcity and demand reduction seems to be the writing on the wall, but the SV GSP seems locked onto a tech salvation strategy for the future; this seems to me to be one, misguided, and two overly optimistic, esp given global fresh water forecasts

-past GRA conferences revealed GSAs all looking for supply enhancements when demand reduction was clearly called for, and here is the SVGSA recapping the same thing

-at least the GSP could be leavened by a bit more emphasis on demand reduction

-maybe Sonoma water needs to lead the way to a regional One Water place, and the GSAs, contractors, etc can follow in the wake, to a more regional conservation stance

-at some point, someone will have to challenge the endless growth model and BAU, or else we will be committed to a tech salvation Star Trek future, but people now seem way too dumb, selfish, and self-centered to even do it

expanding in the above comments Group 2A Projects could be framed as ways to help us live within our means, and not as tools to enable further growth

-if in realty, further growth is inevitable, i.e 900-some more unincorporated homes in the GSP planning horizon, then IMO, the onus and GSA message should not be on BAU but rather on all straws will get less per straw

-supply enhancements can be framed as seeking to keep the basin in an S-curve frame

-at the end of the day though, it seems the GSA is taking sustainability, and putting a tech salvation twist on it when IMO, the sustainability goal should be more explicitly centered on demand reduction

-the ASR, GW banking, drought mitigation projects are very good for sustainability, this is a strong point to crow about to the public, and it benefits municipal users, the bulk of the basin population

GSA Board comment 9/27/21

Get to S-curve trajectory with PMAs

Growth only after a stable S-curve regime has been established

“The GSA believes that the current level of Subbasin pumping can be continued with the effective implementation of the projects and management actions described above.

“Groundwater in storage under a baseline scenario without projects is estimated to decline by an average of 290 AFY over the entire 50-year projection period”

save 290 AFY

ask for a discreet sacrifice #

then no fees or onerous regulation

get to a carrying capacity based in conservation, not growth

create a sense of managing basin together

need to address Prisoner’s dilemma if no meters or measures

with conservation, say, this is your chance to voluntarily work it out

I’d like to note that I shared some of my GSP comments to staff with the GSA Board, to make demand management stronger relative to supply enhancements

Staff has taken AC comments seriously and gone through the GSP to adjust accordingly, in particular to make demand management strategies more explicit, do them early on. Staff has also worked to note that where Group one and two PMAs may fall short of GSP goals, where policy and regulatory tools and actions can fill in the gaps. You’ll see in today’s staff report that staff has been responsive to AC concerns

For example

-metering, can’t manage what you don’t measure

-well spacing

-Permit Sonoma well permitting in deep aquifer depletion areas

-Permit Sonoma re-do of GW availability map

Fred Allebach

Sonoma Valley Groundwater Sustainability Agency (GSA), Advisory Committee member

9/30/21

My evolving take on groundwater (GW) supply and demand, conservation, and “growth”

I think it's a false assumption that conservation and growth can't peaceably co-exist in the Sonoma Valley GSP, (Groundwater Sustainability Plan.) Growth doesn't have to mean consuming more GW. The way to finesse this is for every GW straw to get less each, rather than to build a wall to protect BAU (business as usual) GW use and limit new users. Room at the inn can be made for new people and new uses. This increased growth and supply, with proportional conservation through time by all, can be met as part of an adaptive water management sustainable yield plan.

The more straws, the less each gets. The more all conserve, the more there will be for all.

Note that Valley of the Moon Water District (VOMWD) currently uses @ 20% GW in its municipal delivery mix, with plans to use up to 30%. GW use and planning thus includes service to Springs disadvantaged communities.

Locals who don't want to share may see that they are sacrificing and conserving GW to benefit future strangers. The onus here becomes on protecting existing stakeholders and excluding any new ones. This is the same dynamic as fostered Trump's border wall and the UGB movement. NIMBYism has a certain xenophobia and stakeholder territorial protectionism at its core.

Thus, we arrive at a place where our local society must decide whether to be exclusive or inclusive in its water policy. I'd like the GSA and GSP to be inclusive.

If so, the GSA will need to frame a "we're all in this together" public message, not cater to a NIMBY frame. If inclusion is a worthy value, we can't be part of building a wall to essentially protect elite users, or to use conservation as a proxy for exclusivity.

Part of my motivation here is to stick up for new affordable housing projects in Sonoma, the Springs, the Springs Specific Plan, SDC, and to help account for 6th cycle and future cycle County and City of Sonoma RHNA, and Housing Elements. Sonoma and Sonoma Valley is a demonstrably segregated, exclusive location where POC (People of Color) have been excluded by zoning laws, real estate redlining etc. This is a place where any essential worker renters are highly cost-burdened.

If the GSP is to be synced with City and county General Plans, there needs to be an overt message that GW is not to be used as proxy for wealthy property owner exclusivity. GW should not be just another lever for NIMBYism.

Housing in Sonoma Valley keeps creeping evermore to the high end as existing stock gets bought up and sold for more and more money. This squeezes out anyone making the median income or less. New affordable units are framed by status quo protectors as "growth" rather than as necessary inclusion for an equitable society.

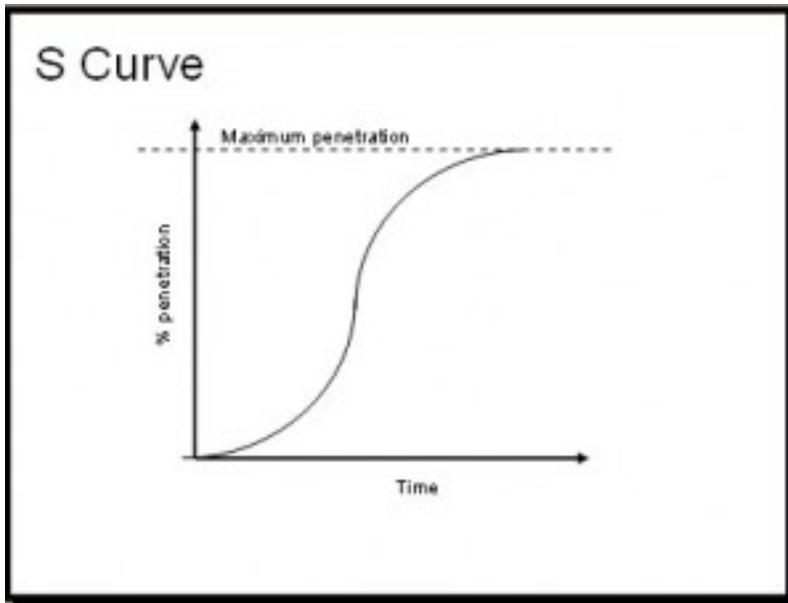
For GW, rather than try and meet BAU water use levels for all existing users and freeze out any new users, I think room needs to be planned for and made for equity in housing. This especially in the VOMWD service area. Room at the inn can't be denied based on lack of water when people are perfectly capable of sharing and doing with less. Sonoma in particular is noteworthy for having among the highest per capita water use in the county.

I'm very concerned that Sonoma Valley will continue to get more and more exclusive, that essential workers will continue to be heavily cost burdened and that water and GW management and policy will become part of an already unacceptable exclusivity and segregation.

BAU GW use needs to be dialed back by current users to account for sustainable yield anyway. As future users come in, all will just have to get less each even as supply sources may be increased to keep baseline GW levels and sustainable yield volumes. Including renters, low-income seniors, young people and POC is not "growth" in Sonoma Valley, it's the conscious creation of a sustainable and equitable society. Inclusion counters a systemic public resource hoarding by wealthy whites in Sonoma Valley and the county. Inclusion is the same trajectory as that of SB-9 which addresses exclusionary zoning.

A reasonable GW use goal is to reach an S-curve carrying capacity for current *and* future users; carrying capacity is implicit in the GSP and in GW sustainable yield; this can be adjusted as time goes by. Keeping an S-curve, a sustainable yield, is our human system adapting to the environmental system with our most important natural resource, water. This can be done it water policy to include and not penalize lower income people and people who work here.

It's a fairly simple concept, S-curve GW use no matter how many users, GW use has to adapt to how many users the basin has. We don't want a basin of all exclusive rich white people, that would be perpetuating a fundamentally unsustainable arrangement.



The GSA, GSP, and county need to be ready if voluntary GW conservation doesn't work. The GSA and GSP need to have tools and policies in place to do mandatory reductions: metering, well spacing, well permitting, zero net use etc.

These reductions in use, even with supply enhancements, are in service of a carrying capacity, sustainable yield level of use, in a society that adapts to serving and including all, not just wealthy land owners.

in the big One Water picture, GW sustainable yield is at once local and at the level of the whole Russian River water system. All trade-offs, sacrifices, limits, enhancements and uses are working in lieu of a sustainable yield for the One Water that we have. It is here that rationales can be constructed to address tensions among current and future users, between conservation and "growth", between inclusion and exclusion. Water is a serious limiting factor, I don't want to see it used in service of exclusion and NIMBYism by stakeholders who have plenty enough extra already to cut back and share.

We, as all past, current and future GW users *are* all in this together bc we do have One Water, even though some in the system may try to make Balkanized arguments that they are somehow set aside from the whole county and Russian River water system.

Simple GW policy prescription: make room at the inn for the already excluded; the more straws into GW, the less each.

SGMA beneficial use

10723.2. CONSIDERATION OF ALL INTERESTS OF ALL BENEFICIAL USES AND USERS OF GROUNDWATER

The groundwater sustainability agency shall consider the interests of all beneficial uses and users of groundwater, as well as those responsible for implementing groundwater sustainability plans. These interests include, but are not limited to, all of the following:

- (a) Holders of overlying groundwater rights, including:
 - (1) Agricultural users.
 - (2) Domestic well owners.
- (b) Municipal well operators.
- (c) Public water systems.
- (d) Local land use planning agencies.
- (e) Environmental users of groundwater.
- (f) Surface water users, if there is a hydrologic connection between surface and groundwater bodies.
- (g) The federal government, including, but not limited to, the military and managers of federal lands.
- (h) California Native American tribes.
- (i) Disadvantaged communities, including, but not limited to, those served by private domestic wells or small community water systems.
- (j) Entities listed in Section 10927 that are monitoring and reporting groundwater elevations in all or a part of a groundwater basin managed by the groundwater sustainability agency.

Sustainability Goal

Many of the sustainability goals reference economic benefits, and beneficial uses. This is fine. However, in triple bottom line sustainability studies, what the latter refer to are “human systems.” Economy, beneficial use, these are human system issues.

Sustainability is the syncing of human and *natural systems*, so that the “back 40”, or in the case of the SVGSA, groundwater, is not used up faster than the needs of future generations to use it and survive, and to be able to get by with groundwater as a local natural resource.

Groundwater in Sonoma Valley is a natural system that it is incumbent on us and our human systems, to steward for future generations, so that they may be able to have an economy and beneficial uses based upon it.

I'd like to see this general idea and language incorporated into the SVGSA sustainability goal.