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RE: Formation of Groundwater Sustainability Agencies in Sonoma County

Please distribute this letter to each of the GSA-eligible agencies.

Sonoma County will soon be forming Groundwater Sustainability Agencies (GSAs) as specified by the Sustainable Groundwater Management Act of 2015 (SGMA).

These comments on GSA formation are from the Sonoma Group of the Sierra Club, which has a membership of over 4500 environmentally-minded residents of Sonoma County. The Sierra Club is a grass-roots, volunteer-led organization with a mission to explore, enjoy, and protect the planet.

We are concerned that the GSAs, if they are organized without considering local circumstances, will not include the ground-water users who are most impacted and knowledgeable about groundwater. We also feel that the GSAs must have a structure that will encourage the input of technical expertise in decision-making.

Sonoma County's Special Circumstances

SGMA states that GSAs are to be formed by one or a combination of several local agencies, but in Sonoma County, local agencies represent populations that rely almost entirely on surface water drawn from the Russian River. Those who rely on groundwater, such as farmers and rural residents who know the most about it and are the most concerned about sustainability, may have no seat at the table. This situation may be unique in the State of California, requiring a different GSA-formation model to ensure representation of groundwater users.

The County's local agencies include County government, the surface water-producing and water-distributing Sonoma County Water Agency (SCWA), which sells that water to other jurisdictions, representing most of the County's towns and cities.

The following facts summarize the situation:

- The Sonoma County Board of Supervisors is also the SCWA Board of Directors.
- SCWA's contractors include the County's most populous urban areas: Santa Rosa, Windsor, Cotati, Rohnert Park — all in the Santa Rosa Plain groundwater basin, and Petaluma, in the Petaluma Valley groundwater basin.
- The City of Sonoma, and the Valley of the Moon Water District in the Sonoma Valley groundwater basin, also receive Russian River water deliveries.

Virtually all of Sonoma County's mutual decision-making about water supplies, wastewater treatment, and related issues takes place in councils that consist of representatives from these same agencies and jurisdictions. The councils also include representatives from another county, since SCWA sells Russian River water to Marin County water agencies (North Marin and Marin Municipal Water Districts).

In Sonoma County the only urban areas that do not substantially rely on surface water supplies are Sebastopol, Healdsburg and the unincorporated towns of Penngrove, Graton, Bodega, and Bodega Bay. These towns and cities are not represented on the councils described above. Excepting Sebastopol, none are in an identified scarcity area requiring formation of a GSA.

The GSA board will be a powerful force in Sonoma County communities. Decision makers need input from agricultural and domestic well owners, mutual water systems dependent on wells, water-focused environmental groups, and Sonoma Resource Conservation District (RCD) if policies are to be cost-effective, science based, inclusive of all impacts, efficient and have buy-in from the large percentage of ground-water users in our groundwater basins.

The Sonoma Group believes that Sonoma County's unique relationship to surface and groundwater supplies requires that the GSAs be formed with great care. In particular, they should include groundwater users and technical advisors with pertinent expertise. We believe that this will lead to decisions and actions based on facts and full scientific assessments. In addition, we feel that growing climate uncertainty requires technical expertise for guiding groundwater policy and decision-making.

We are concerned that a GSA consisting entirely of elected officials or political appointees will:

- Have limited knowledge and experience with water supply other than wholesale and retail supply of surface water (primarily the Russian River);
- Have no knowledge, or very limited knowledge of hydrology, geology, land-use planning and other fields of great importance for water supply issues, and especially for establishing groundwater sustainability programs;

- Be forced to rely unduly on staff, which has yet to be assigned, defined, or funded. Local urban staffs may lack technical expertise in climate, water, and sustainability fields;
- Represent jurisdictions with priorities based on local interests, such as maintaining their allotments based on surface water supplies;
- Leave out direct stakeholders and well users, who depend on groundwater sustainability and whose involvement is necessary to fulfill SGMA goals.

Potential Sonoma County GSA Composition

GSA might include elected officials from the surface-water dependent jurisdictions discussed in the foregoing, with the possible addition of appointed stakeholders, such as Resource Conservation District personnel; rural and agricultural well owners; mutual water system operators; environmental group representatives, others (“at large”); and appointed technical experts.

Staff could be drawn from the SCWA, local jurisdictions, Utility Districts, DWR, or might be new hires.

We support the following structure for GSAs in Sonoma County, which has been proposed by the Sonoma County Water Coalition:

- I. A GSA for each Sonoma County basin should consist of 9 to 11 members, comprising:
 - A. Elected officials representing as many as 5 Sonoma County authorities, including SCWA and at least one groundwater-dependent jurisdiction. Representatives other than SCWA should rotate every 3-5 years, to keep all jurisdictions involved.
 - B. Appointed stakeholders, representing those who will be directly impacted by GSA decisions and be able to affect groundwater sustainability, including:
 - Agricultural well owner(s) (potentially Sonoma RCD, others)
 - Rural domestic well owners
 - Well-dependent mutual water systems
 - Water-focused environmental organizations (local/national)
 - Independent technical experts

Initial candidates for such appointments should be selected from current members of the Sonoma Valley and Santa Rosa Plain Basin Advisory Panels, organized under AB 3030.

II. Technical Advisory Committee:

We understand that SGMA allows a GSA to appoint an advisory committee to provide technical expertise. Members of such a Technical Advisory Committee (TAC) could be drawn from:

- SCWA staff or utility departments with specialization in groundwater related science
- Basin Advisory Panel members
- Independent consultants
- Academic/scientific experts
- Two or three representatives from jurisdictions reliant on wells
- Ag well owners
- Domestic well owners
- Mutual water company representatives
- Environmental representatives

Scientific experts should represent fields such as:

- hydrology, including an expert on hydrologic modeling
- geology, including expertise on sedimentary and bedrock geology
- wetlands biology and fisheries biology
- land use planning

Our experience is that advisory groups appointed by elected officials have little power to guide decision making, however. If experts serve at the pleasure of an appointing board, their effectiveness may be severely limited. We therefore advise that the GSA powers relative to the advisory board should be defined by governing rules, such as:

- Requirement for a supermajority GSA vote to reject a TAC recommendation; and
- Findings in support of GSA votes or actions on TAC recommendations, whether negative or positive, must be put in writing, and they must be based on the science as defined in Groundwater Sustainability Plan regulations.

We respectfully request that you support formation of Groundwater Sustainability Agencies for Sonoma County, supported by Technical Advisory Committees, using the concepts that are outlined above.

Sincerely,



Suzanne Doyle
Chair, Sonoma Group Executive Committee