

SONOMA COUNTY WELL ORDINANCE
POTENTIAL TALKING POINTS

In order to achieve a reliable water supply for all (people, plants, critters) we need to take sensible steps toward sustainability beginning today. We have come to this place because we are out of balance between our supply and our uses, and we're the only ones who can repair the situation.

Feel free to use any of these concepts in public comment – or in an email to the Board. Paraphrase/plagiarize/adapt to your own use and/or your own priorities. Mix & Match – do what feels right, but please weigh in. Choices made in Tuesday's hearing will shape the future for all time.

1) This Well Ordinance update MUST be an iterative process. Adaptive management is key to the long-term success of the County's well ordinance in order to sustain a reliable water supply and legally required protection of our public trust resources. Due to the current lack of available information regarding groundwater use, interconnected waterways, impacts of streamflow depletion, instream flows, and other important issues - it is extremely important that clear processes and timelines, with specified deadlines, be built into the ordinance itself to address these gaps, and make informed future decisions possible.

- Your own Technical Working Group repeatedly acknowledged extensive data gaps and analytical uncertainty (including climate change impacts) that require further investigation, and would inform adaptation choices made by the County.

2) “Low Water Use” for new “ministerial” (across-the-counter) permits for residential use should be 0.5 acre feet per year (afy). The suggested 2 afy is 4 times what is used by an average family of four.

Additional points ... choose any:

- Our wells and public trust resources are already facing the dire consequences of high use wells without any reasonable limit, and allowing more wells to do the same thing is only going to cause more harm for us. Maintaining the status quo is not in any of our best interests.
- 2 afy equates to almost 1,800 gallons of water use per day.
 - For an average 4-person family, this equates to about 450 gallons per person per day (Gallons Per Capita per Day = GPCD).
- California Department of Water Resource's report on residential water use states: “[] the current statewide median indoor residential water use is 48 gallons per capita per day, and that a quarter of California households already use less than 42 gallons per capita per day.”
 - This is the average amount of water needed to satisfy all basic indoor human health needs.
 - If the County were to use Under 0.5 af use, this State recommendation would still leave about 200 gallons per day (GPD) every day for outdoor needs, *after* all indoor needs are met, by a 4-person residential family on their property.
- 0.5 afy is more in line with average residential groundwater use in Sonoma County, and it still allows for broad outdoor irrigation needs.
- Residences should stay within this reasonable limit of 0.5 afy if seeking a simple permit pathway.
- In short, a 2 afy threshold does not represent “low-water use” by any common sense reading. It will not encourage groundwater conservation or discourage water waste, and it is unlikely to adequately address future impacts to public trust resources and our *existing* wells.

3) Replacement “Wells for Existing Use” must also ensure that nearby wells are not further depleted and adverse impacts to public trust resources are mitigated. It is important that the permitting processes include basic conservation requirements, and in order to plan for a sustainable future, we need information gained by metering and reporting.

Larger uses must undergo discretionary review to meaningfully address contributions to cumulative impacts. The status quo is causing us harm and cannot be allowed to continue.

- 4) Groundwater is a shared public resource, and it is time that we *all* do our part to help ensure the long-term sustainability of our waters for all of our benefit. This means that groundwater users must adopt conservation measures wherever feasible.
 - To help make conservation requirements fair, the County should set a reasonable use limit for wells in order to qualify for a ministerial (across-the-counter) permit and allow individuals to meet the requirement in a way that works for their own use.
 - In order to protect our groundwater supplies, the County must be clear about which criteria and standards will be applied to permits that will credibly and reliably reduce use.

- 5) The proposed “Public Trust Review Area” (PTRA) map is not inclusive or fully representative of public trust resources within Sonoma County. Important public trust resources in our three groundwater basins (GSAs), which the State has already identified as over-subscribed, are not receiving necessary protection.
 - The PTRA should be as expansive as possible *until more information is available* to show that basic requirements of conservation, reduced use, and metering and reporting are not necessary to protect our public trust resources or our long-term groundwater sustainability. Portions of GSAs have not been included in the PTRA without a clear explanation. There are basic things that all well owners in the County would want to do to assure their own reliable water supply - and for the benefit of the entire County.

- 6) Metering &/or monitoring requirements should be required for well permits in the County.
 - Metering and reporting of groundwater use is the only way the County can close the existing data gaps and improve models used to make decisions - in order to make *informed* decisions on how to assure future water supplies and protect public trust resources. This information is particularly important to comprehensively address cumulative impacts that are ongoing and worsening each year.
 - Metering for all new and replacement wells in the County would help ensure fairness for *all* applicants, and is vital to ensuring the County is able to identify when and where to make informed changes to the PTRA.

- 7) There are inconsistencies between the Summary Report and the proposed language that deserve further questioning and clarification by Staff. All inconsistencies and omissions that are key to any permit issuance, enforcement, and other necessary action by Staff and applicants must be addressed before approval. For example:
 - The proposal does not include any criteria, terms, thresholds, standards, or identifying information that must be met as part of the discretionary permit process.
 - Mitigations that are part of the permitting process must be quantifiable, including “ministerial” (across-the-counter) permits.