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To: [_CityCouncilListPublic](#); [Osburn, Gabe](#); [Jones, Jessica](#); [Nicholson, Amy](#); [Basinger, Megan](#); [Martin, Peter](#)
Subject: [EXTERNAL] 6/2/26 Santa Rosa City Council meeting: housing study session and UWMP comments
Date: Monday, June 1, 2026 9:58:14 AM
Attachments: [Housing strategy study session comment.docx](#)
[UWMP comments.docx](#)

Please see my comments attached
best, Fred

"We don't know where we're going but we have to stick together in case somebody gets there."
Ken Kesey

Fred Allebach

5/30/26

Public comment, 6/2/26 Santa Rosa City Council meeting, Santa Rosa 2025 UWMP agenda item

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Why does demand increase 3000 AF between 2025 and 2030 but then flatten for the next 20 years? What is it about the next four years that calls for so much more water usage?

p. 12

As we conserve more, hard system costs stay the same or grow, this puts the squeeze on ratepayers, who are squeezed not only by water system costs by innumerable other increasing costs. As a backdrop, Santa Rosa has a high cost of living problem, addressing it needs to be more of a priority.

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The city's outreach is generally good if you are plugged into automatic email updates. However, I only heard about the SR UWMP on 5/22/26 and I only saw it because it was on the council agenda and I study the agenda.

p. 29

Does water for the Santa Rosa Ave area come from the Cotati inter-tie aqueduct? I think I get that city water supply comes into the system at different places along the Sonoma Water supply lines and that due to different valves and pressures, that water stays local to the area where it enters the SR system.

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What percent of Santa Rosa water is groundwater (GW) from Sonoma Water? I'm looking for a GW/DAC nexus, for example if Santa Rosa has approximately 40% of its population at DAC-level MHI and Santa Rosa uses x amount of GW, then it can be possible to say that city DACs use x amount of SR GW.

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AFY = acre feet per year. I have data that city gets/ uses 376 AFY of GW. The 2024 SR Plain GSA annual report shows SR gets 10.34 AFY. The UWMP gives other GW figures in different places. It would be good for the reader and interested parties to have all the GW supply and demand and sources all in one chart with an accompanying narrative to explain the subtleties.

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The city will really grow by 20,000 people by 2030? If current housing trends stay (under-production of Very Low-income housing units, then this will also mean displacement of lower-income households because market rate housing tends to outstrip Very Low and Low-income units for production; it all adds up to increasingly less affordable housing. This means DACs and lower MHI households are progressively squeezed for cost burden and under pressure for displacement and homelessness. Affordability and high cost of living are serious problems in Santa Rosa, ones that should be in the top five for attention.

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The UWMP data here does not show that 37.7% of the SR population meets DAC-level MHI. This is accurate, this is from US Census ACS 24 update.

<https://censusreporter.org/profiles/16000US0670098-santa-rosa-ca/> This is part of a pattern I see to underplay the true extent of city DACs and cost burdening; the data is all there and it is very serious for a lot of people yet the level of priority from the city to address systemic inequities seems to remain low.

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Poverty as an income category is extreme. You practically need to live in the gutter to qualify as poverty. As noted, DACs as a percent of the overall population and the level of cost burdening in SR is very high. *The latter are above poverty level.* The city's own General Plan demographic data re: equity priority areas, EJ communities, food deserts etc., these low-income and struggling designations tell another story than this UWMP. See my Substack for a set of maps that tell this [story](#). Social justice advocates always have to fight to get DAC data on the table, it's as if people become inured to it and would rather paint a rosy picture. Society is run by the haves, not the have nots, but society needs the have nots to do all the dirty work. A just society tries to treat all members well.

p. 38

With 80% of residential housing as single-family housing (SFH) and the bulk of future units likely to be SFH as well, this type of housing and land use is the most wasteful water, GHG, and energy use of all.

p. 39

The city plans for 10,000 more housing units by 2030, seems like a lot at current production. My sense is that the city is caught in a Ponzi-type scheme to have growth pay current bills but at the same time water use is under pressure to conserve and remain low. The writing on the wall for consumers and rate payers is to pay more for less water. For better water use efficiency, the

city needs to double down on more multi-family housing and to, as per Affirmatively Furthering Fair Housing and the Housing Element, put these units in higher resource opportunity areas and not stuff them all into the Santa Rosa Ave area with the lowest quality of life re: noise, light and air pollution.

p. 39

Of city residential housing, 80% is SFH and the water use is proportionally higher in these types of homes, the energy and GHG footprint of a SFH makes it the most unsustainable type of housing.

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The legacy of demand for SFH will leave an echo into the future as far as inequity and class and race segregation in the city, and for water use. This echo tracks closely the city's DAC and cost burdening issues and makes up a modern redlining pattern.

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The UWMP says: "The City's General Plan projects that there will be 99,940 total housing units in the City by 2050. Assuming the City has a similar breakdown of household income classifications in 2050 as it does today, then approximately 44 percent of the City's housing units (43,974 units) will be occupied by very-low-income and low-income households in 2050." Ther UWMP does here open up the scope of lower-income population but in this statement the UWMP is not accounting for displacement. If COL issues are not more proactively addressed, the essential worker class will be progressively displaced. This sort of analysis is almost entirely absent from the city's Quarterly Economic updates.

As well, lower income homes tend to be larger households that use more water per capita.

p. 55

I suggest as city policy to reduce SFHs instead of being a sitting duck for whatever the market may bring; produce more multi-family homes and more 100% Affordable Housing. The city needs to be more intentional to address systemic inequity issues, for example with housing, the policy can be: we want more of this type of housing and for developers that bring it we are willing to offer substantial incentives and price breaks; for housing types we don't want, we will have poison pills to discourage it. More equitable housing will result in less future water use.

p. 70

I get confused with the data, between the GW pumped, GW anticipated to be pumped, what GW is available at maximum supply levels, what % GW the city gets from Sonoma Water, what % city-GW is in the city's normal mix? It's hard for the reader to get these GW data points

clearly. I suggest to make some charts and a narrative of this for the public, a concise GW breakdown of all relevant data points.

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The chart shows GW supply can go up to 4100 AFY.

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If all SoCo cities seek and add new GW supply from their own wells, that will negatively impact the SR Plain GSA Groundwater Sustainability Plan and lead to quicker need for GSP projects and management actions to in turn, seek more supply. The relentless seeking of new supply in a reduced water future for the State is a problem. GW use overall looks like a tragedy of the commons kind of a race to the bottom while also claiming to conserve and be frugal. Some concerning trends here are not really spelled out in the UWMP, again, a tendency to paint a rosy picture... Even as Santa Rosa has done will to reduce and conserve, if we still need more and ore GW in the future then further demand reduction is a reasonable strategy. What would be a per capita use goal for further household demand reduction? Especially for SFHs?

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It takes careful reading of the UWMP to discriminate between maximum supply numbers, current use numbers etc. It's a lot of data! I'd be curious how many people actually read the UWMP and made studied comments?

p. 95

The UWMPs says that Lake Sonoma FIRO (Forecast Informed Reservoir Operation) can maybe offset loss of Potter Valley Project water. FIRO at Lake Mendocino and maybe also Lake Sonoma and a future Lake Sonoma pipeline to the Russian River at Cloverdale are ways Sonoma Water is getting at new supply. At the end of the day, with the population growth predictions for SR and SoCo, COL issues, and water supply issues, it all mashes up into a pretty big unknown. There could easily be a lot less growth than predicted, and a concomitant reduction in water use, and rising water costs to pay for hard system costs that keep rising.

Maybe the UWMP could have alternate scenarios for population and water use, predicted growth, less than predicted growth, and what the costs will be for ratepayers. What if growth does not pan out and existing customers have to foot the water bill? What is a worst-case scenario for ratepayers? The UWMP has a lot on supply and demand but not much on the costs to ratepayers. The UWMP also IMO, lacks a realistic take on city DACs, city cost burden and the overall erosion of household income here by high COL, especially for a growing cohort of seniors on fixed incomes and essential workers with lower MHI. What is the city going to do to

address the current and incipient household financial crisis of near 40% of its residents? Water is one more cost that keeps going up and up and up.

The UWMP and water use are in this case, one more example of an affordability tip of the iceberg here that IMO needs to be a top five priority of the City. Anyone looking at the data will not need a city survey to see where the needs are.