



ECOS
ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO



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October 12, 2018

Forrest Williams Jr., Chair
Sacramento Central Groundwater Authority
827 7th Street
Sacramento, CA 95814

Re: Monitoring the South American Subbasin

The Environmental Council of Sacramento (ECOS) notes with interest the Sacramento Central Groundwater Authority (SCGA) Board's September 12, 2018 direction to Staff to evaluate the State of California's C2VSimFG model input data for the South American Subbasin (Subbasin) and update the State's model data as necessary. We believe that SCGA's understanding of the hydrology of the Subbasin should be measurably improved. SCGA should look to the modeling and monitoring efforts underway by the Regional Water Authority and the Sacramento Groundwater Authority (SGA), and adopt and put in place a comprehensive and compatible monitoring program for the Subbasin.

We also believe the Board acted with imprudence when it recently adopted its operating budget for the upcoming year, in that, among other issues, the Board did not provide enough funding for groundwater monitoring and modeling. SCGA's existing set of monitoring wells is insufficient to provide a full understanding of the flows of groundwater into, through and out of the Subbasin. Semiannual data points are not sufficient to understand and effectively manage the Subbasin. While we commend SCGA's recent effort to provide real time monitoring in a small, select group of wells, we believe you should do far more in this important area.

SCGA's full understanding of the Subbasin's hydrology would be significantly improved by the addition of monitoring locations and real time recording equipment, as well as the integration of modeling efforts being carried out by UC Water, other local water agencies such as Regional Sanitation, and adjacent Subbasin Authorities such as the SGA. SCGA cannot become SGMA-compliant while continuing to operate year after year without taking the fundamental step of developing and implementing a comprehensive monitoring program so that it can fully understand the hydrology of the Subbasin. We urge SCGA to rearrange its financial priorities so that monitoring and modeling have a much higher priority. We offer the following issues as further needs for this change in SCGA's spending priorities.

Under SGMA, SCGA's monitoring network must meet State standards, include inter/intra basin coordination and management zones for Groundwater Dependent

Ecosystems (GDEs), enable SCGA to manage the Subbasin proactively to protect water quality, and be based on an accountable framework that is particularly sensitive to trigger points and ensures SCGA can take appropriate management action when a trigger point(s) is exceeded. It seems incongruous that SCGA is pursuing an Alternative Plan and at the same time is not engaging in some of the fundamental SGMA requirements (e. g. monitoring, public education, and outreach) required for a Groundwater Sustainability Plan. This pattern suggests that SCGA staff and principals continue to believe that a passive approach to groundwater management will be acceptable into the future.

SCGA needs to take more aggressive actions to effectively manage the Subbasin. ECOS recently heard presentations from UC Davis professors Drs. Graham Fogg and Robert Gailey on the topics of excess storm water recharge and water banking respectively. We learned that the Region's long-term water security is largely dependent on the prudent management of groundwater, and that the recent four year drought may be the Region's typical dry season by 2050 as climate change impacts accelerate. Dr. Fogg explained that the Subbasin is one of only two basins in the central valley that contains known geologic substructures that can effectively accept large amounts of storm water recharge. The Subbasin is also uniquely situated because of its large water conveyances, including the Folsom-South Canal and the Cosumnes River, which can move excess storm water to recharge areas. Regional water purveyors as well as purveyors from outside the Subbasin could utilize the Subbasin for groundwater storage by means of one or more water banks. These features and conditions provide SCGA a unique groundwater management opportunity. However, neither the excess storm water recharge, nor the subsequent groundwater extraction that would result from the above water bank strategy can take place without comprehensive and effective monitoring, and comprehensive monitoring is needed now to support the development of this water supply resource.

ECOS understands that the Region's water purveyors are generally interested in the implementation of a water bank to facilitate in lieu recharge and excess storm water recharge. SAFCA has secured \$1.78 billion to provide enhanced flood control for the region and also create the potential for excess storm water recharge. SAFCA is in discussions with the Placer County Water Agency and the Sacramento Municipal Utility District to evaluate and pilot a project that will use excess storm water for recharge. We believe it is incumbent on SCGA to take immediate actions to participate in these discussions and to develop a comprehensive, Subbasin monitoring program that is fully compliant with SGMA and supports in lieu and storm water recharge development within the Subbasin.

The recent State Court of Appeal ruling on the Scott River case is a reminder of the importance of restoring Cosumnes River flows and of better understanding the connection between the aquifer and the Cosumnes River. The Scott River case has extended the Public Trust doctrine to situations where groundwater pumping negatively impacts stream flow, as it does with the Cosumnes River. It is worth

remembering that in 2007 the State Supreme Court rejected Sacramento County's argument that groundwater pumping's effect on the Cosumnes River no longer mattered because the river was substantially disconnected from its groundwater aquifer.

Under SGMA, the lower Cosumnes River basin has several GDEs which SCGA has not yet fully documented. We believe SCGA must move forward now to fully document the GDEs and restore the River and its basin's GDEs. One of the first steps SCGA should take is to include within its expanded monitoring program a series of real-time monitoring points up and down the water course including its adjacent creeks so that SCGA's Subbasin management actions contribute positively toward the improvement of the GDEs and the reconnection of the Cosumnes river flow to the aquifer below it.

In light of the issues raised above, and the continued importance of SCGA's comprehensive understanding the hydrology of the Subbasin, we urge SCGA to make adjustments to its spending priorities for the current and subsequent fiscal years so that it can invest in SGMA compliant Subbasin monitoring and modeling systems.

Sincerely,



Ralph Proper
President, ECOS



Rob Burness
Co-Chair of Habitat 2020

CC: Don Nottoli
Sacramento Central Groundwater Authority (SCGA) Board