



**ECOS**  
ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO



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October 23, 2018

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Re: Approval of the Alternative Plan to the Groundwater Sustainability Plan

The Environmental Council of Sacramento (ECOS) had previously expressed our concerns regarding the request to the Department of Water Resources (DWR) by Sacramento Central Groundwater Authority (SCGA) to approve an Alternative Plan to the Groundwater Sustainability Plan (GSP) required under the Sustainable Groundwater Management Act (SGMA) (See attachments 1 and 2). SCGA's continued, largely passive, approach to groundwater management over the past several years has strengthened our view that SCGA's GMP and current governance and finance structure do not constitute a legally adequate "alternative" to preparation of a GSP. The purpose of this letter is to further reinforce our opposition to SCGA's request, and to urge DWR to quickly find that SCGA is not in compliance with SGMA, and, therefore should immediately begin preparing a GSP.

The County of Sacramento recently approved the South Sacramento Habitat Conservation Plan (HCP) which streamlines Federal and State permitting for covered developments and infrastructure projects while protecting habitat, open space, and agricultural lands. The HCP encompasses 317,655 acres of Sacramento County. Of this amount, 36,282 acres will become part of an interconnected preserve system and include important Groundwater Dependent Ecosystems (GDEs). Twenty eight plant and wildlife species and their natural habitats have been targeted for conservation. The Sacramento Central Subbasin (Subbasin) is largely within the HCP's boundary. Unfortunately SCGA did not actively participate in the development of the HCP. Nor has SCGA documented the Groundwater Dependent Ecosystems within the Subbasin that are a critical part of SGMA and the GSP planning process. SCGA needs to establish a comprehensive monitoring program that will serve as a foundation for effective groundwater management and recharge programs. This program must be an accounting based water level and water quality framework that supports SCGA taking appropriate action when trigger points are reached. It is our belief that SCGA will only accomplish these important SGMA requirements when DWR directs it to develop and implement a GSP. Absent a GSP, the groundwater dependent ecosystems of the

SSHCP preserve system will be at risk, which will place the entire SSHCP conservation strategy at risk.

SCGA's continuing passive approach to groundwater management results means that it is not only neglecting problems but missing opportunities. ECOS has recently learned of the full import of the Sacramento Central Subbasin's significance as a potential major storm water recharge area and groundwater resource for the water security of the Region. According to Dr. Graham Fogg of UC Water, the Subbasin is one of only two basins in the entire Sacramento Valley with currently identified geology which can readily accept large amounts of excess storm water as recharge. Dr. Fogg is developing a program of research to determine the optimal locations of the Subbasin's recharge areas. Unfortunately, SCGA has not exerted any leadership in this critically important area of Subbasin management and is not currently working with Dr. Fogg on the research design. If SCGA were actively developing a GSP, the plan requirements necessitate that SCGA do the foundational work that will assist the Region's water purveyors and other's with key stakes in the Region's water future, to move forward to develop and implement a major program of storm water recharge in the Subbasin.

Specifically, the GSP framework requires SCGA to fully document GDEs. This action will ensure Subbasin management decisions are not in conflict with GDEs and the HCP, including the siting and management of recharge and extraction facilities. The GSP framework requires that SCGA design and implement a Subbasin monitoring network that meets state standards and includes inter/intra basin coordination. The development of this monitoring system coupled with coordination between SCGA and neighboring subbasins is integral to the development of a Subbasin recharge program. Additionally the GSP requires management zones for GDEs. This planning effort will serve as the integration point between recharge and extraction zones, and the HCP and GDEs. SCGA's development of a GSP will bring about proactive water quality and groundwater level monitoring and management (including GDEs and areas in the basin undergoing remediation). SCGA has not embraced a management role in these important areas but as part of the GSP process it will need to do so if significant recharge is to occur in the Subbasin. Finally, the GSP framework calls for the documentation of important land use considerations. Clearly, if SCGA were following the GSP process it would be actively identifying high priority storm water recharge areas within the Subbasin and working with local land use authorities to assure their preservation.

ECOS is aware of the importance of establishing one or more water banks as part of a comprehensive Subbasin groundwater recharge program. Dr. Robert Gailey of UC Water recently presented a discussion of the Regional groundwater recharge storage opportunities afforded by water banking as well as the issues the Region faces in bringing one or more banks into fruition. SCGA's completion of a GSP will provide the monitoring and accountability framework and the Subbasin management structure necessary for the establishment of an excess storm water recharge program and water bank(s). Subbasin management, groundwater recharge, and water banking are new concepts and general public awareness of them is low. DWR's GSP requirements compel SCGA to engage in community and stakeholder outreach and engagement. SCGA has not engaged in outreach and has not implemented an effective communication strategy. Both of these GSP requirements are essential to gaining community support for effective basin management.

We believe the above issues, coupled with earlier concerns we and others have raised, provide compelling reasons why DWR should reject SCGA's Alternative Plan. We urge you to expeditiously take this action.

Sincerely,



Ralph Proper  
President, ECOS



Rob Burness  
Co-Chair of Habitat 2020

cc: Don Nottoli, Sacramento Board of Supervisors  
Darrell Eck, Staff Engineer, Sacramento Central Groundwater Authority  
Forrest Williams Jr., Chairman, Sacramento Central Groundwater Authority