



ECOS
ENVIRONMENTAL
COUNCIL
OF SACRAMENTO



Environmental Council of Sacramento
P.O. Box 1526, Sacramento, California 95812
Phone: 916-444-0022

January 11, 2019

Richard M. Johnson (Sent via email to johnsonr@saccounty.net)
Executive Director of Sacramento Area Flood Control Agency
1007 7th St, 7th floor
Sacramento 95814

Subject: 2018 update of the American River Basin Integrated Regional Water Management Plan

Dear Mr. Johnson,

The Environmental Council of Sacramento (ECOS), a 501c3 organization, and Habitat 2020, the Conservation Committee of ECOS, are partner coalitions dedicated to protecting the natural resources of the greater Sacramento region while building healthier, more equitable, economically thriving communities. ECOS-Habitat 2020 member organizations include: 350 Sacramento, AARP, Breathe California-Sacramento Emigrant Trails, Friends of Stone Lakes National Wildlife Refuge, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Sacramento Citizens' Climate Lobby, Sacramento Electric Vehicle Association, Sacramento Green Democrats, Sacramento Housing Alliance, Sacramento Natural Foods Coop, Sacramento Audubon Society, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes, Save the American River Association, Sierra Club Sacramento Group, Friends of the Swainson's Hawk, and the Sacramento Area Creeks Council.

We are heartened by the extensive work the Sacramento Area Flood Control Authority (SAFCA) and the Regional Water Authority (RWA) are doing to improve the Sacramento Region's water reliability, security, and flood protection. The 2018 update of the American River Basin Integrated Regional Water Management Plan ("Plan") includes SAFCA's efforts to improve Regional flood control, provide for storm water management, and develop excess storm water recharge opportunities all in the face of increasing storm intensity and frequency due to the impacts of climate change. We are especially interested in SAFCA's efforts to develop and promote the potential beneficial uses of excess storm water that moves down both the American and Cosumnes Rivers. Like SAFCA, we would like to see some of this water captured to restore aquifer levels and stored in the Region's Subbasins for future use during periods of drought. SAFCA is commended for its success in securing the financial resources required to carry out its programs and projects in this vitally important area of flood protection.

We understand that one of the next steps to acquiring this excess storm water recharge resource is to complete a thorough analysis of where within the Region the prime recharge and extraction zones are located. This analysis should include the area(s) compatibility with existing land usage and water management/conveyance constraints. We understand that Dr. Graham Fogg of UC Davis is preparing a project plan to carry out this analysis and that SAFCA has already held discussions with the Cosumnes Subbasin GSAs on this same topic. A project or projects to carry out this work in both the South American and the Cosumnes Subbasins should be a high priority



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for inclusion within the Plan, and again, we hope that SAFCA will take a leadership role in working with the UC Davis Water Group and the appropriate GSAs to fund this important work.

We understand that RWA is preparing to engage in a public awareness campaign to convey to elected officials, agency decision makers, opinion leaders, and the public, the importance of the projects and activities identified in the Plan and how they lay out a prudent path for the region's water future. SAFCA's efforts will certainly be prominently featured in this public outreach effort. We hope to participate with SAFCA and RWA in this campaign. ECOS/Habitat 2020 represents most of the environmental and community-based groups in the Region and has strong ties with conservation and other public interest groups as well.

We note with keen interest the efforts SAFCA and others are making to work with the Sacramento Central Groundwater Authority (SCGA) and the Cosumnes Subbasin Groundwater Sustainability Agencies (GSAs) to join with the North American Subbasin GSAs to develop and adopt a comprehensive American River Basin descriptive modeling system (SacIWRM). The region wide adoption of SacIWRM will ensure accurate accounting and impact assessment of both recharge and pumping operations and accurately describe the flows and elevations of groundwater through and between each Subbasin. The SacIWRM will enable each Subbasin's GSAs to adopt Subbasin management plans that are capable of responding to delayed changes within the Subbasin due to pumping and recharge operations, and respond to GDE and other triggers requiring GSA actions. We understand that SAFCA has volunteered to pay the additional costs the Cosumnes Subbasin GSAs will incur to ensure SacIWRM meets the Cosumnes Subbasin needs. We strongly hope that that the Cosumnes Subbasin GSAs will adopt the SacIWRM model and, if needed, accept SAFCA's generous financial offer. We will engage with SAFCA and RWA in any way practical to assist in accomplishing this objective.

ECOS/Habitat 2020 stand ready to work collaboratively with SAFCA to communicate the importance of regional water security including appropriate storm water management, recharge, and flood protection; and the plans and projects that best lead the region toward this goal. We stand ready to meet with you and your staff to further explore these points and how we may assist in your Agency's efforts to effect a comprehensive water security investment that can actually benefit the environment. If need be, please contact Robert Burness at rmburness@comcast.net or 916-956-0365.

Sincerely,

Robert C. Burness
Co-chair of Habitat 2020

Ralph Propper
Board President of ECOS

CC via email: Tim Washburn, Director of Planning, SAFCA, washburnr@saccounty.net