



**ECOS**  
ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO



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

John Woodling  
Executive Director  
Regional Water Authority  
5620 Birdcage Street, Ste 180  
Citrus Heights, CA 95610

Subject: Regional Water Authority (RWA) Planning Forum

Dear Mr. Woodling,

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.

ECOS/Habitat 2020 are heartened by the extensive work the Regional Water Authority (RWA) and its member organizations are doing to improve the Sacramento Region's (Region) water reliability and security. The 2018 update of the American River Basin Integrated Regional Water Management Plan ("Plan") provides a solid framework to guide the Region's water purveyors and GSAs to improve interconnectivity; engage in water transfers, recharge and banking; plan for and manage the three American River Subbasins sustainably; and, ensure that the Region's three river systems have sustaining flows, temperatures, and water quality; and, provide the needed habitat for the flora and fauna they support.

We understand that RWA has an established review group called the Planning Forum. ECOS/Habitat 2020 would be pleased to formally join this group. If this meets with RWA needs please include Ted Rauh as our contact point. Ted can be reached at [tnrauh@att.net](mailto:tnrauh@att.net) or at (916) 261-8011.

We also 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 the Plan lays out a prudent path for the region's water future. We would be pleased to participate with RWA in the development and implementation of this campaign. ECOS/Habitat 2020 represent, or are affiliated with, most of the environmental and community based groups in the Region, and have strong ties with conservation and other public interest groups as well. We believe we can be of significant assistance. However, we believe several key issues need to be addressed to ensure the full success of outreach effort. If these issues are not addressed important aspects of the Plan may be called into question because of its failure to address the Region's three groundwater subbasins equally and equitably.



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Specifically, we strongly believe that each Subbasin needs to have comprehensive Subbasin descriptive modeling systems that assure accurate accounting and impact assessment of both recharge and pumping operations, and accurately describe the flows and elevations of groundwater through the Subbasin so that a Subbasin management approach can be carried out that is capable of responding to delayed changes within the Subbasin due to pumping and recharge operations, and responds to GDE and other triggers. RWA is in the process of establishing this type of modeling system for the North American Subbasin and is actively working with the other two Subbasins to adopt the same system or establish compatible systems. We fully support these efforts.

The Plan includes the potential for substantial water banking resulting from excess storm water runoff. We have received information from UC Water experts that this resource constitutes a real potential for our region. SAFCA is moving forward with a series of actions outlined in the Plan that can make significant quantities of excess storm water available over sufficient time frames to allow for selective regional groundwater recharge and banking under the right conditions. A critical step in satisfying some of these conditions is the completion of a thorough analysis of where within the Region the prime recharge and extraction zones are located. This analysis should include each area's compatibility with existing land use and water management/conveyance constraints. This information will allow for appropriate modeling to be developed so that the actual storage, flow, and recovery potential of these groundwater resources can be fully understood. We understand that UC Davis is preparing a project plan to carry out this analysis that may be ready for funding in the near future. We think that a project to determine this information should be included within the Plan.

The above observations are not intended to deter RWA's important planning and project management activities, but rather to point out several gaps that if not addressed, may diminish the extensive work that has already been done. Regardless of RWA's ability to react to our suggestions, ECOS/Habitat 2020 stand ready to work collaboratively with RWA to communicate the importance of regional water security 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 comprehensive water security that can benefit the environment. Robert Burness can be reached at [rmburness@comcast.net](mailto:rmburness@comcast.net) or 916-956-0365.

Sincerely,

Robert C. Burness

Co-chair of Habitat 2020

Ralph Propper

Board President of ECOS