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Wednesday, July 24, 2019

Mr. Derrell K. Eck  
Executive Director  
Sacramento Central Groundwater Authority  
827 7<sup>th</sup> St., Room 301  
Sacramento, CA 95814  
Email: Eckd@saccounty.net

RE: South American Subbasin Alternative

Dear Mr. Eck:

As you are aware, ECOS and Habitat 2020 have been following the Sacramento Central Groundwater Authority's (Authority) development of the South American Subbasin Alternative (South American Alternative), and the Department of Water Resources (DWR) review and decision regarding its acceptability under the terms and requirements of the Sustainable Groundwater Management Act (SGMA).

The letter you received, dated July 17, 2019, from DWR's Deputy Director Taryn Ravazzini, and the accompanying staff report, form a well-reasoned determination that the South American Alternative will not satisfy the requirements of SGMA. While the Authority is given thirty days to provide information to refute DWR's findings, it seems that devoting time to this pursuit is not in the best interest of the Sacramento region and the Authority.

DWR's letter and staff report identify a number of important technical analyses and groundwater modeling/monitoring work necessary to effectively manage the Subbasin. DWR has identified the need to assess and manage the interaction of groundwater and surface water throughout the Subbasin and directs the Authority to aggressively move forward in this and other important areas as it develops a Groundwater Sustainability Plan (GSP) consistent with SGMA.

We urge the Authority to take into account the importance of this and other short comings identified in DWR's staff report, as well as the short time frame left to the Authority to complete all the required work necessary to satisfy the requirements of completing a timely GSP.

We believe there is no further time to delay. Technical expertise that may be required to assist the Authority to complete this important work may not be available if the next thirty days are spent in an effort to overturn DWR's decision.

We strongly urge the Authority to focus on developing a comprehensive and complete GSP. To that end, we offer our support to assist the Authority in the important activities of engaging the public in the process of developing an open and transparent GSP. We stand ready to work with you to that end, particularly with respect to groundwater dependent ecosystems.

Sincerely,

A handwritten signature in cursive script that reads "Ralph Propper".

Ralph Propper  
President, ECOS

A handwritten signature in cursive script that reads "Robert C. Burness".

Rob Burness  
Co-Chair Habitat 2020