



**ECOS**  
ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO



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

November 11, 2019

Ramon Roybal  
Assistant Engineer  
Sacramento Central Groundwater Authority  
827 7th Street Room 301  
Sacramento CA, 95814

Sent via email to RoybalR@saccounty.net

Subject: South American Subbasin Prop 68 Round 3 Grant Proposal for Evaluating GDEs and Surface Water Depletions (Grant Proposal)

Dear Mr. Roybal,

The Environmental Council of Sacramento (ECOS) is a 501(c)(3) nonprofit organization working to achieve regional and community sustainability and a healthy environment for existing and future residents. ECOS member organizations include: 350 Sacramento, Breathe California Sacramento Region, Friends of Stone Lakes National Wildlife Refuge, International Dark-Sky Association, Physicians for Social Responsibility Sacramento Chapter, Sacramento Citizens' Climate Lobby, Sacramento Electric Vehicle Association, Environmental Democrats of Sacramento County, 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, Service Employees International Union (SEIU) Local 1000 and the Sierra Club Sacramento Group.

Members of Habitat 2020, a committee of ECOS, include: Friends of Stone Lakes National Wildlife Refuge, Friends of Swainson's Hawk, International Dark-Sky Association Sacramento Chapter, Sacramento Area Creeks Council, Sacramento Audubon Society, Sacramento Valley Chapter California Native Plant Society, Save Our Sandhill Cranes, Save the American River Association, Sierra Club Sacramento Group and Sacramento Heron and Egret Rescue.

We want to express our thanks for the opportunity to review and comment on the Sacramento Central Groundwater Authority's (SCGA) Grant Proposal. We are very concerned about how the South American Subbasin's (Subbasin) Groundwater Dependent Ecosystems (GDE) and Groundwater/Surface Water Interfaces (GWI) are identified, evaluated, and managed as part of SCGA's development and administration of a Groundwater Sustainability Plan (GSP) for the Subbasin. We commend SCGA for opening its grant development process to include public comment. We are encouraged by this action and look forward to working with SCGA and the other Subbasin GSAs in implementing the grant's workplan. In addition, in the coming months we look forward to working with all parties to develop a GSP for the South American Subbasin (SAS).



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We support the overall workplan proposed in the Grant Proposal. Specifically we endorse the workplan's support for the completion of the numerical integrated groundwater surface water CoSANA model. We support the technical approach proposed for the identification and analysis of GDEs and GWIs. Finally, we support and commend SCGA for the identified efforts to include public input throughout the project. SCGA has included the potential formation of a Cosumnes Surface Water Group if such a group is found useful by those concerned and affected by decisions in the region. We see this group playing an important role in the analysis of the river basin and riparian forested areas and agricultural lands. We also endorse the workplan's inclusion of and call for cross-basin coordination between each of the subbasins that share a river boundary

Finally, we urge both the South American Subbasin and the Cosumnes Subbasin GSAs to work with their common stakeholders to establish the lower Cosumnes River basin as a "Management Area" under SGMA in each Subbasin's GSP. This designation will allow the lower Cosumnes River basin's critical resources to be managed effectively.

ECOS/Habitat 2020 look forward to participating with SCGA in the implementation of the Grant Proposal and the ongoing efforts to develop a GSP for the Subbasin.

Sincerely,

Sean Wirth  
Co-Chair, Habitat 2020

Robert Burness  
Co-Chair, Habitat 2020