



ECOS
ENVIRONMENTAL
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OF SACRAMENTO



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From: Environmental Council of Sacramento (ECOS) and Habitat 2020

Subject: Significant and unreasonable domestic, shallow agricultural and small system well impact evaluation as part of Groundwater Sustainability Plan (GSP) preparation

The Environmental Council of Sacramento (ECOS) and Habitat 2020 would like to comment on the development of Groundwater Sustainability Plans (GSPs) in the American River basin's three related subbasins, the North American, South American and Cosumnes. Pursuant to the Sustainable Groundwater Management Act (SGMA), Groundwater Sustainability Agencies (GSAs) will need to identify significant and unreasonable conditions related to the six sustainability factors in their GSPs. Two of these undesirable results, degraded water quality and reduction in well capacity, are the subject of this letter. In particular, we would like to emphasize the need to fully consider domestic, shallow agricultural and small system water use in a) establishing significant and unreasonable conditions, b) designing and establishing monitoring programs, and c) determining thresholds.

In that role, we offer the following comments toward the development process.

1. A complete inventory of domestic, small agricultural and small system well location, construction and quality information will be needed for full GSA evaluation and documentation.
2. Definition of Undesirable Results needs to specifically address domestic and small system wells.
3. Significant and Unreasonable Indicators for water level and water quality will be needed for domestic, small agricultural and small system wells as well as large public systems.
4. GSP thresholds need to lead to an effective, workable plan for mitigation of private and small system well impacts, should they occur.

Discussion: Previous planning efforts have focused, logically, on overall water budgets, larger scale groundwater levels and significant remediation efforts. While some domestic, small agricultural and small system well information was collected in earlier compilations, there appears to be incomplete knowledge of well construction and groundwater quality in shallower wells, especially those outside remediation zones. These shallower wells make up a small volume but significant supply source for many individuals in the basin. SCGA alone estimates there may be approximately 5903 domestic wells in the subbasin (Appendix E, Central Sacramento County Groundwater Management Plan, 2006). Construction details of relatively few are included in the previous groundwater management plans of the 3 subbasins (Sacramento Groundwater Authority, Groundwater Management Plan 2014; Central Sacramento County Groundwater Management Plan 2006; South American Subbasin Alternative Submittal Final Draft, 2016).

GSP activities are anticipated to include both groundwater banking and changes in extraction patterns. Changes of this type can influence water levels as well as movement of lower quality groundwater or contaminants. While there are ongoing, well reviewed, remediation efforts at several large facilities, there are also likely to be unknown sources of historic contamination in the basin. New contaminants are also being identified that may need future remediation. Safeguards for domestic, shallow agricultural wells and small system wells need to be part of the GSP efforts.

Shallow well owners and those without significant resources will need to have a process in place to protect their water sources. The Sacramento Central Groundwater Authority (SCGA) attempted to address these in earlier planning efforts with a Well Protection Program which recognized that agricultural and agricultural-residential users have no alternative source of supply if their wells are dewatered. In order not to burden current groundwater users with the costs of deepening or replacing wells caused by new extraction or groundwater management changes, a trust fund was to be established.

This program, however, does not appear to have been fully implemented and placed a significant burden on private well owners to prove impact.

As the GSPs are developed in the area, we encourage the GSAs to not only consider significant and unreasonable reductions in domestic and agricultural water supplies and water quality, but also consider how thresholds will be used to mitigate practical water supply issues for smaller users. Many small systems, shallow agricultural and domestic well owners will not be able to independently participate in GSA decisions, monitoring or projects. Should adverse impacts occur, they are also unlikely to have the resources to shut down their water source, find new water sources and conduct independent investigations.

A recent survey of newly submitted GSPs for critically over-drafted basins shows that there could be significant impact to private wells and small systems. The analysis indicates that “some Central Valley GSPs have established minimum thresholds – or failure points – that, if reached, would allow up to 85% of the domestic wells to go dry or be impacted” (Letter from multiple NGOs to Wade Crowfoot et al, February 10, 2020 attached). This impact is even more significant when the impacted wells provide disadvantaged groups with their water supply.

We encourage all of the American Basin subbasins to review the NGO review document (attached) and consider how to avoid these potential impacts in each of the GSPs. We also encourage the GSAs to engage all well owners in the GSP development efforts in order to develop a workable plan to safeguard all groundwater resources in the respective subbasins.

If you have questions or would like more information, please feel free to contact Barbara Evoy, ECOS/Habitat 2020 Water Committee, barbaraevoy@gmail.com.

Sincerely,



Ralph Propper
ECOS President



Robert Burness
Co-Chair, Habitat 2020

Attachment: NGO letter to California Natural Resource Agency, Department of Water Resources, Cal EPA Special Counsel for Water Policy, and State Water Resources Control Board titled “Reviewing Groundwater Sustainability Plans In Accordance With State Agency Obligations to Consider the Human Right to Drinking Water”, February 10, 2020. Letter signed by the Leadership Counsel for Justice and Accountability, Self-Help Enterprises, Community Water Center, Union of Concerned Scientists and American Rivers.