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To: Groundwater Sustainability Agencies in the American and Cosumnes Groundwater Subbasins

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**SUBJECT: Recommended Principles to guide the development and implementation of proposed Projects and Management Actions that are part of Groundwater Sustainability Plans**

The Environmental Council of Sacramento (ECOS) is a 501c3 nonprofit, with the mission to achieve regional and community sustainability and a healthy environment for existing and future residents. Habitat 2020 is a coalition that works to protect the lands, waters, wildlife and native plants in the Sacramento region. The great Central Valley of California has been identified by the World Wildlife Fund as one of North America's most endangered eco-regions. Preserving its remaining open space and agricultural land is essential for sustaining native plants and wildlife, and ensuring a high quality of life for ourselves and future generations. Habitat 2020 members include: Friends of Stone Lakes National Wildlife Refuge, Friends of Swainson's Hawk (FOSH), International Dark-Sky Association, Sacramento Area Creeks Council, Sacramento Audubon Society, Sacramento Heron and Egret Rescue, Sacramento Valley Chapter of the California Native Plant Society, Save Our Sandhill Cranes, Save the American

River Association and the Sierra Club Sacramento Group. Habitat 2020 also serves as ECOS' Habitat and Conservation committee.

On behalf of the Environmental Council of Sacramento and Habitat 2020, a collaboration of regional environmental groups that also serves as the Council's environmental policy and program arm, we are submitting the following comments for your consideration as you formulate Groundwater Sustainability Plans (Plan) for the North American, South American, and Cosumnes Groundwater Subbasin. We recognize the significant implications these Plans will have for both the long-term viability of the built environment and the region's environment. We are following the development of each Subbasin's Plan and have given considerable thought to what principles should be used to guide the development and implementation of any proposed Projects and Management Actions that become part of each Plan. The following paragraphs present suggested Principles we believe should be part of each subbasin's Plan. These Principles draw upon both state guidance for Groundwater Sustainability Plans and the spirit and intent of the Sustainable Groundwater Management Act.

1. **Projects and Management Actions contain a balance of short term and long-term measures.** For example, in subbasins with decreasing groundwater storage or lowering groundwater elevations, demand side management strategies including land fallowing and required water conservation and efficiency programs offer the opportunity to begin to balance the subbasin's water budget in the near term and avoid having the deficit increase precipitously while long-term actions are planned, constructed, and begin to have their desired effect.
2. **Short Term Measures Must Contribute to Long-Term Savings.** Each GSP should include guidance for the use of fallowed water. It is important that landowner contracts ensure that the foregone groundwater not be used within the year of fallowing or in subsequent years for non-basin use or non-agricultural purposes unless additional measures are taken by the landowner that contribute to equivalent permanent savings.
3. **Projects and Management Actions provide multi-benefits to the region.** Multi-benefit projects can holistically address groundwater sustainability, ecosystem conservation, floodwater management, community needs, and agricultural preservation. Multi-benefit projects also provide enhanced funding opportunities. For example, the California Water Resilience Portfolio emphasizes a multi-benefit approach, which will guide California State funding opportunities.
4. **Projects and Management Actions are regionally coordinated and when practical, are jointly sponsored/managed by more than one GSA/Groundwater Subbasin.** The region's water supply is a dynamic, interrelated system made up of groundwater subbasins and surface water sources (Folsom Reservoir, rivers, streams, wetlands, and springs). Just as the subbasins are related to each other by groundwater flows and boundaries, Plans as well as Projects and Management Actions may often have cross basin impacts and benefits and require coordination as well as shared participation by all affected parties. The Plans under development present different challenges in the short term but each subbasin will be adversely affected by climate change in the long term. A regional, coordinated perspective would lead to an optimum set of Projects and Management Actions that effectively attain long term human and environmental goals at the least overall cost to the region.

5. **Projects and Management Actions address coequal goals and objectives of groundwater sustainability and environmental uplift.** Documented declines in available groundwater have had a negative impact on some regional ecosystems over many years. While actions that meet SGMA requirements are expected to return the groundwater system to its 2015 level and meet the needs of human water users going forward, those actions by themselves do not restore lost or damaged environmental resources, particularly in light of foreseeable climate-related and other changes. These resources can only be maintained and gradually restored through aspirational goals, and projects and management actions that directly improve their access to groundwater. The regional water bank as well as other groundwater recharge projects can be designed and implemented to enhance Groundwater Dependent Ecosystems (GDE) and create ecosystem uplift benefits.
6. **Projects and Management Actions include future groundwater well placement away from surface water resources and Groundwater Dependent Ecosystems (GDE) and work to decommission wells that are shown to have negative impacts on these ecosystems.** The analysis of GDEs required by SGMA is providing important information regarding their health, current and historic condition, and the impacts changes in groundwater pumping and surface/groundwater interactions are having on them. GDEs provide the region a plethora of human benefits including aesthetic, recreational, ecological and life enhancing experiences. They provide these benefits as well as basic habitat for the creatures we share the region with, including creatures that are endangered by human activity. While we strongly suggest that the Plans include aspirational environmental goals associated with GDS beyond the basic requirements of SGMA, one specific area GSAs can act is groundwater pumping. Where, when, and how much pumping occurs in areas where GDEs are present or may be aspirationally restored through the implementation of multi-benefit Projects and Management Actions is critical to each Plan's success.
7. **Projects and Management Actions and subbasin monitoring and modeling activities are monitored by means of real time well data.** Historically, groundwater subbasins have been monitored by means of spring and fall groundwater monitoring programs. At least two subbasins may need to plan and implement Projects and Management Actions to reverse declining groundwater levels and storage that are occurring now or are projected to occur in the future. In addition, each subbasin has an ongoing responsibility to assure undesirable groundwater conditions do not develop or persist. Each subbasin will need to be managed to provide for increased conjunctive use, water transfers, and water banking, and this increased groundwater activity requires that all three subbasins put in place real time groundwater monitoring systems.
8. **Projects and Management Actions include active participation in the proposed Regional Water Bank managed by the Regional Water Authority.** Each Plan should include a Water Bank Management Action and should articulate basic management principles for its formation and operation within the subbasin. In addition to the principles of an environmental lift (see #4 above) and prevention of doing environmental harm as evidenced by the conditions and circumstances regarding when and where deposits and withdrawals from the bank are allowed, each GSP should include the Bank's accounting principles, operating costs, and monitoring controls to be employed within the subbasin. Each GSP should discuss banked water operating losses and how they will be accounted for and managed.

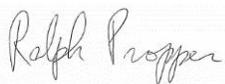
9. **The adjudication of water bank balances should not adversely impact groundwater basins.** The issue of the existence of any water bank balances in the North American Subbasin and how these balances are reconciled with the new Water Bank framework, needs to be discussed in the North American Plan. If the existence of these balances might impact other subbasins, then this information needs to be conveyed to the other GSAs so that they can consider these impacts and take them into account when completing their Plans.
  
10. **Projects and Management Actions should not harm surface water resources and their dependent habitat.** Projects and Management Actions that include conjunctive use programs and water transfers can enhance the region's groundwater resiliency and sustainability. However, if these actions are not correctly implemented, they can harm the subbasins and the region's surface water resources including the ecosystems these water resources support. To guard against such impacts, each Plan should include the management controls and conditions under which conjunctive use and water transfer projects will occur within each subbasin. Each Plan should commit adherence to the American River Flow Management Standard and any subsequent standards that may be set for the American and Cosumnes Rivers.
  
11. **Projects and Management Actions are guided by sound science and the principles of Adaptive Management.** The California Department of Fish and Wildlife's *Fish and Wildlife Groundwater Planning Considerations* document presents scientific and adaptive management principles and approaches that should be used in Plan development and project implementation. See <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=170185&inline>

ECOS and Habitat 2020 support the extensive planning efforts each GSA is undertaking, and we encourage your actions to develop sound Plans that will contribute to the integration of ground and surface water into a sustainably managed regional system for the betterment of all of the region's inhabitants and environment. If you wish to discuss these comments please contact Ted Rauh, Chair of the ECOS/Habitat 2020 Water Committee. Ted can be reached at [tnrauh@att.net](mailto:tnrauh@att.net) or on (916) 261-8011.

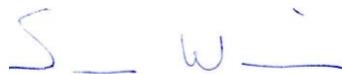
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Sincerely,



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