



April 23, 2021

Jim Peifer, Executive Director, Regional Water Authority
Sent via email to jpeifer@rwah2o.org

Subject: Environmental and Public Interest Representation as part of the Regional Water Authority's efforts to develop a Regional Water Bank

Dear Mr. Peifer,

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, as well as the League of Women Voters Sacramento County and Save the American River Association, we are submitting the following comments for your consideration

We are following the Regional Water Authority's (RWA) progress toward developing a regional water bank with great interest. We note that RWA on December 4, 2020 approved a Subscription Program Agreement to fund Phase 2 of regional water bank project. Key items in the work plan for this agreement are the development of a water accounting framework and a governance structure for the water bank:

“Water Accounting Framework – This framework will establish a set of policies and procedures to encourage and support conjunctive use operations to facilitate the long-term sustainability of the underlying groundwater basin as source of public water supply. This will be developed in coordination with local Groundwater Sustainability Agencies to ensure consistency with applicable Groundwater Sustainability Plans.”

“Governance – This activity will determine and establish a formal governance structure for water bank operations and management, assuming an RWA-managed program. It will establish tools to support preferred governance structure, and roles and responsibilities. It will also address policy-related issues such as fees from transfers and environmental commitments.”

The specifics of these frameworks are critical to ensuring that a regional water bank will protect and can perhaps enhance ground and surface water resources. We believe that this can best be achieved if environmental and public perspectives are integral to the development of the regional water bank.



We urge RWA to formally include environmental and public interest representatives in the Authority's discussions concerning the governance and operation of the water bank, either through participation on the Program Committee of the Subscription Program Agreement or some other meaningful forum. If you have any questions regarding this request or wish to discuss it further, please contact Ted Rauh, Chair of the ECOS/Habitat 2020 Water Committee. He can be contacted at tnrauh@att.net or (916) 261-8011. Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink that reads "Ralph Propper".

Ralph Propper, President
Environmental Council of Sacramento

A handwritten signature in blue ink that reads "Sean Wirth".

Sean Wirth, Co-Chair
Habitat 2020

A handwritten signature in black ink that reads "Robert Burness".

Robert Burness, Co-Chair
Habitat 2020

[Signed]

Betsy Weiland
Save the American River Association

[Signed]

Suzi Bakker, President
League of Women Voters Sacramento County