



ECOS
ENVIRONMENTAL
COUNCIL
OF SACRAMENTO



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September 8, 2021

To: Groundwater Sustainability Agencies in the South American Subbasin
Sacramento County; Linda Dorn, dornl@saccounty.net
Northern Delta; Erik Ringelberg, erik@thefreshwatertrust.org
Omochumne-Hartnell Water District, Mike Wackman, info@ohwd.org
Sacramento Central Groundwtr Auth; John Woodling, jwoodling@geiconsultants.com
Sloughhouse Resource Conservation Dist; Austin Miller, austin@sloughhouseRCD.org

Subject: Comments on Draft GSP Section 2.5, Sustainable Yield Estimate

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. Member organizations of ECOS include: *350 Sacramento, Breathe California Sacramento Region, Environmental Democrats of Sacramento, Friends of Stone Lakes National Wildlife Refuge, International Dark-Sky Association, Physicians for Social Responsibility Sacramento Chapter, Sacramento Audubon Society, Sacramento Citizens' Climate Lobby, Sacramento Electric Vehicle Association, Sacramento Housing Alliance, Sacramento Natural Foods Coop, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes, Save the American River Association and Sierra Club Sacramento Group.* 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. Member organizations of Habitat 2020 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 Sierra Club Sacramento Group.* Habitat 2020 also serves as ECOS' Habitat and Conservation committee.

We find the introductory materials to be duplicative of the material presented in Section 1 of the Draft GSP and do not materially contribute to the technical presentation of the South American Subbasin's (SASb) Sustainable Yield under SGMA. If there is reference to the former level of 273,000 AFY within this section of the GSP analysis, then a full technical analysis of why the basin sustainable level has changed from 273,000 AFY as late as last year to the new sustainable average level of 235,000 AFY should be included. One can only conclude that moving from a 20-year-old single value to a range that has a substantially lower midpoint, is the result of improved data and analysis carried out as part of the GSP process. In addition, there is an omission in the several paragraphs that discuss the uncertainties associated with the analysis underpinning the Sustainable Yield Estimate. These paragraphs neglect to mention the uncertainty posed by climate change. In our earlier comments on the draft GSP, we pointed out the importance of thoroughly documenting the climate change analysis that underpins the GSP analysis including the basis for the Sustainable Yield estimates.

We find that the materials meant to describe how the Sustainable Yield estimates were determined and why 235,000 AFY is the average sustainable yield, are not sufficiently explanatory for the lay person. The presentation needs to explain how the range of pumping was developed and, using one or more of the charts, identify what the

points on these charts mean, and why and how the X and Y axis are developed. Also, if 0 change in groundwater storage is the desired point (as presented in figures 2.5.2(a & b) why is there no X and Y axis lining up on figure c and what is the significance of the negative value under the corresponding point of 235,000 AFY?

We do not find a compelling analysis that determines why a range of pumping between 210,000 AFY and 270,000 AFY is acceptable. Also, there is no description of what “various year types” are, who determines them, and how are they factored into basin management. If this analysis is dependent on past years weather and hydraulic conditions projected forward, then an additional caution is warranted given that more recent conditions are tending to diverge from the past. It is not apparent from the analysis presented whether the SASb could withstand successive years like the past two continuing for another one or two years while being operated on the premise that 270,000 AFY can be withdrawn from the basin without Sustainable Yield consequences. More information is needed to put context around the “year types” and the GSAs’ management responsibilities vis a vis the SASb’s Sustainable Yield.

The document presents a table of annual pumping levels which it asserts, if adhered to, would ensure the SASb is managed so that its Sustainable Yield is maintained. However, there is no description of monitoring or management actions the GSAs will engage in to ensure that the SASb is not drawn down in such a fashion that its Sustainable Yield is negatively impacted. The GSP should include Management Actions to ensure that SASb pumping is managed not to exceed these pumping levels. In addition, there is no base line calculation for the storage level in 2015. It seems obvious that this value is needed so that the Sustainable Yield can be monitored and managed. There is five years of known data that can be used to develop and track the SASb’s Sustainable Yield.

We believe that Management Actions are needed in at least two areas. First, there is a need to manage data and annually report the amount of annual pumping and how that volume relates to the SASb’s sustainability including the Sustainable Yield. This work also needs to include coordination with the Water Forum, The Regional Water Authority, and the Bureau of Reclamation regarding forecasts of current and future “water years”. This coordination will allow the GSAs to better understand if any management actions (e. g. possible pumping restrictions or demand management actions) are needed to maintain basin sustainability.

A second Management Action includes the establishment of agreements with the water purveyors who plan to utilize the basin’s groundwater for conjunctive use so that their pumping levels are consistent with figure 2.5-3. Agreements that match pumping levels with “water years” will assist the GSAs in exercising their responsibilities under SGMA. Similar agreements will be needed with those purveyors and others who carry out water banking operations.

Sincerely,



Ralph Propper
President, ECOS



Robert Burness
Co-Chair, Habitat 2020

cc: Jessica Law, Executive Director, Water Forum
Jim Peifer, Executive Director, Regional Water Authority