



Environmental Council of Sacramento
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April 14, 2022

California Department of Water Resources (DWR)
P. O. Box 942836
Sacramento CA, 94236-0001

Subject: Comments regarding the sufficiency of the South American Groundwater Sustainability Plan (GSP)

ECOS appreciates the opportunity to comment on the South American GSP during DWR's public review process.

Here is a summary of our comments:

- 1) We find the climate change analysis used as the basis for the GSP is not sufficiently robust to reflect currently anticipated climate change conditions for the region. The analysis does not reflect current science. For this reason, we suggest DWR provide more direction in this area for future GSP updates.
- 2) We believe a review of the GSP utilizing Article 6, Section 355.4 finds the plan deficient in several important areas. Our findings are listed in more detail below. DWR should work with the subbasin GSAs to address the shortcomings described below before approving the GSP.

Sincerely,

Handwritten signature of Susan Herre in black ink.

Susan Herre
ECOS President

Handwritten signature of Ted Rauh in blue ink.

Ted Rauh
Chair, ECOS Water Committee

The following are our full comments:

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.

ECOS has participated in the Sacramento Region's water planning and management activities for the past twenty-five years. In January 2000, ECOS became a signatory to the Sacramento Water Forum Agreement.

With regard to regional groundwater management, ECOS raised concerns in a letter dated June 6, 2018 to DWR regarding the Sacramento Central Groundwater Authority's subbasin Alternative Plan which DWR ultimately rejected.

DWR's action led to the need for the development of the subject GSP submitted to DWR in January of 2022. ECOS participated in the development of the South American GSP and provided comments during the public review process.

Based on our review of the South American GSP, posted on DWR's web site, we find the Groundwater Sustainability Agencies have conducted a sufficient analysis of the subbasin, have or plan to initiate programs to further identify and protect Groundwater Dependent Ecosystems (GDEs) and points of groundwater/surface water interaction, and have initiated programs and actions to identify shallow wells within the subbasin and potentially protect them from unwarranted drops in groundwater elevation.

However, we find the climate change analysis used as the basis for the GSP is not sufficiently robust to reflect currently anticipated climate change conditions for the region. The analysis does not reflect current science. For this reason, we suggest DWR provide more direction in this area for future GSP updates. In addition, we believe a review of the GSP utilizing Article 6, Section 355.4 finds the plan deficient in several important areas. Our findings are listed in more detail in the following paragraphs. DWR should work with the subbasin GSAs to address the following shortcomings before approving the GSP.

1. The GSP does not effectively protect the subbasin from sustainable criteria exceedances (Article 6, Sections 355.4 b. (1), (4), (10)).

The potential for exceedance of one or more sustainable criteria for as long as four years before corrective action is taken is not acceptable. This extended period puts both GDEs and Interconnected Surface Waters (ISW) in serious jeopardy in the event of a prolonged exceedance. It could also lead to avoidable impacts on shallow wells. The facts that the GSP does not rely on current, published climate science to project future hydrologic conditions, and does not contain any management actions that can be taken in a timely manner to curb groundwater pumping, further support the need to take action after one year of exceedance. This approach is being taken in the North American GSP.

Further, conjunctive use and groundwater banking are ongoing and planned to expand in the subbasin. These activities may create further need for subbasin management actions. ECOS believes the GSP does not contain technical justification for this lack of protectiveness nor the basis for the significant difference between the South and North American subbasins. The exceedance criteria should be established as one year before DWR approves the GSP.

2. Management of the subbasin's sustainable yield is not articulated in the GSP (Article 6, Sections 355.4 b. (1), (5), (6)).

The GSP lacks detail and an apparent strategy for managing pumping through drought cycles. An average sustainable pumping amount has not been established as a management tool in the GSP. This amount, compared to annual pumping by those in the basin, will be important to craft any type of response to negative impacts. It is necessary for demand management (see below). The GSP does not describe how this pumping amount is to be calculated annually. This will be especially important as climate change progresses and drought management tools are assessed.

DWR should ensure that the GSP include this analysis and that it be presented in a future annual report prior to the 2025 GSP update.

3. Demand management is not included as a management action to moderate groundwater pumping in the region (Article 5, Section 355, 6 (1), (5), (6)).

Demand management is discussed in the GSP as a potential means of reducing pumping but is not listed as a management action that can either be used by the GSAs or triggered by them through agreements with the water purveyors and agricultural community if necessary to sustainably manage the subbasin. ECOS believes the GSAs can engage with non-purveyor pumpers on voluntary or mandatory conservation measures. ECOS also believes that the GSAs should engage with water purveyors regarding their water shortage contingency planning. This will be necessary to manage groundwater pumping cutbacks when subbasin conditions warrant such actions. DWR should ensure that the GSP includes demand management as a management action.

4. GSA members profess a strong interest in Groundwater Transfers and Banking, but the GSP does not include a management action to develop criteria and procedures for the conduct of groundwater transfer and banking activities (Article 5, Section 355, 6 (1), (5), (6)).

Groundwater transfers are utilized by water purveyors who operate in the subbasin. Regional water banking is a stated objective of the Regional Water Authority and extensive local and state resources are being spent to develop the program. It is not disputed that there are issues regarding how a water bank or transfers are conducted that can either facilitate or hinder the sustainable operation of the basin. DWR should ensure that the approved GSP includes a management action to develop criteria and procedures for the conduct of groundwater transfer and banking activities within the subbasin, that integrates but does not hinder the sustainable management of the subbasin.

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