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ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

May 8, 2023

Mr. Randy Marx, Chairman
Mr. James Peifer, Executive Director
Sacramento Groundwater Authority

Subject: Invitation to Discuss the Status of the North American Subbasin

Dear Mr. Marx and Mr. Peifer,

On behalf of the Environmental Council of Sacramento's Water Committee, I would like to invite you to join us on May 24, 2023 from 6:00 to 7:00 pm to discuss the current conditions of the North American Subbasin (NASb), and Sacramento Groundwater Authority's (SGA) ongoing efforts and plans to continue to understand the NASb, address areas of concern identified in the Groundwater Sustainability Plan (GSP) and maintain the NASb's current sustainability.

The Committee has had an opportunity to review SGA's *Water Year 2022 Annual Report for the North American Basin* (Report) recently submitted to the State Department of Water Resources (DWR) as required to fulfill the annual reporting process under the Sustainable Groundwater Management Act. We congratulate you on the Report. We found it to be well prepared and informative, and hope that future Reports will have an opportunity for public discussion before they are submitted to DWR.

Our review of the Report has identified several areas of interest we would like to discuss with you. We hope these areas can be included in your discussion of the Report's findings when we meet. The areas of interest include:

- 1) The Report makes numerous comparisons between water years (WY) 2021 and 2022 as well as the period between WY 2009 and 2022. SGMA makes use of WY 2015 as a base compliance point. Have you considered referencing 2015 as one of the comparison points, and the use of the range of WY 2015 to the present as one of the ranges for comparisons?
- 2) The Report refers to an accounting system being developed to establish groundwater pumping targets and accounting for surface water used in-lieu of groundwater. We understand the Regional Water Authority (RWA) is currently developing a Regional Water Bank. We would like to learn more about SGA's efforts to create its own accounting system for the NASb and how SGA plans to work in tandem with RWA in the implementation of the Regional Water Bank.

3) The Report provides a comprehensive update on the status and progress SGA and the other NASb Groundwater Sustainability Agencies (GSA) are making in carrying out the Projects and Management Actions contained in the NASb GSP. We are interested in learning more about these actions including those being planned to address the issues of groundwater dependent ecosystems and interconnected surface water.

4) The difference noted in the Report regarding estimated NSAb storage levels resulting from the CoSANA model and from well monitoring data totals 12,200 AF. While this number is not large it continues to be a significant amount. The concern regarding this difference is exacerbated by the apparent plan to make use of the model as a component of the Water Bank management tools. We are interested in your views about the efficacy of the model and what actions are planned to verify and improve its accuracy.

5) The Report identifies several monitoring wells that have exceeded their Management Thresholds for WY 2021 and 2022 and includes several steps SGA is planning to take to investigate the situation. We are interested in learning more about these plans and actions and what criteria SGA may use to determine if one or more of these wells should be removed from the monitoring program or its MT be modified.

6) Finally, we are interested in learning about SGA and other NASb GSA plans to coordinate with other neighboring Subbasin Groundwater sustainability Agencies; SGA workplans to address monitoring shortcomings including any identified that cross subbasin boundaries; the steps SGA plans to take to address any identified impacts the proposed water bank program may have on NASb or neighboring subbasins; and, the possible impacts on NASb and neighboring subbasins that might be caused by pumping changes like those anticipated by the City of Sacramento.

In conclusion, we again want to commend SGA for a well written and complete Report. We look forward to meeting with you over Zoom on the 24th.

Sincerely,



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Chair, Water Committee