



ECOS

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OF SACRAMENTO

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Subject: Letter of Thanks and Suggestions for Well Permitting Coordination

On behalf of the membership of the Environmental Council of Sacramento and the Water Committee, I would like to thank each you and Trevor Joseph for the thoughtful and informative briefings you provided on the status of the region's three groundwater subbasins. All of us, and the many guests who attended the meetings or have viewed the videos have found the presentations and subsequent discussions of significant value in understanding the regional efforts to maintain and/or attain sustainable groundwater resources for all beneficial users.

As you could tell from our questions and the discussions following your presentations, we continue to be interested in Groundwater Sustainability Agency (GSA) efforts to sustain and improve conditions for Groundwater Dependent Ecosystems (GDE), coordination among all the region's GSAs regarding plan implementation and subbasin modeling/monitoring, and GSA efforts to implement each subbasin's Groundwater sustainability Plan. We congratulate the North American and South American Subbasins on their recent Groundwater Sustainability Plan (GSP) approval and hope the Cosumnes GSAs will soon see approval of their plan as well.

One of the areas all three GSPs call for is additional work in cataloguing and protecting shallow and domestic wells and in the permitting of new wells. Each plan singled out this area for further analysis and collaborative work with the County and those who have wells of this type. We also understand that a recent Governor's Executive Order places additional responsibility on GSAs and the County in well permitting – namely making a finding that any new wells subject to County permitting are consistent with the GSP. We understand that making this finding can also have impacts on future land use development and create a situation that may not have been envisioned when the GSAs were formed and the GSPs developed.



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GSAs have specific technical data about each subbasin including specific monitoring and modeling information and where critical GDEs are located. This and other information developed and managed by the GSAs should be of value in helping the County make appropriate permitting decisions. GSAs may be able to contribute specific new well location criteria and permitting specifications that take advantage of this information. These well permitting requirements can assist the County's efforts to ensure new permitted wells do not damage the effectiveness of existing wells, negatively impact GDEs, damage groundwater modeling/monitoring systems, and/or adversely impact subbasin sustainability.

We understand that John Woodling has contacted the County and suggested a meeting to discuss GSA interactions with the County's groundwater well permitting program. We also understand that the County is interested in working more closely with the region's GSAs on this and other regional groundwater issues. ECOS continues to have an interest in this area and may have insights and experience that are of value to both the GSAs and the County. When appropriate, we would like to join with you and the County to reach a consensus on how this new responsibility will be carried out consistently across the region.

Best Regards,

Theador N. Rauh
Chair, ECOS Water Committee

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