



# ECOS

ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

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Subject: Subbasin Groundwater Monitoring, Groundwater Dependent Ecosystems, and the 3<sup>rd</sup> year GSP Annual Report

Gentleman,

The Environmental Council of Sacramento (ECOS) has closely followed the development and implementation of the North American, South American and Consumnes Groundwater Sustainability Plans (GSP). Quite a bit of work was done to characterize these groundwater resources including the Groundwater Dependent Ecosystems (GDE) and Interconnected Surface Waters (ISW) within them, and to begin the work of bringing the three subbasins into full sustainability. With both the recent droughts and climate change, this work will be pivotal in helping to assure both adequate regional water supplies and protection of environmental resources that depend on groundwater.

Each Groundwater Sustainability Agency's (GSA) groundwater monitoring network is critical to understanding subbasin operations and potential impacts to GDEs and ISWs from dry year pumping and climate change. We understand that work planned to fill out and maintain the groundwater monitoring networks has or may be deferred, and, in some cases, has been made more critical by the loss of some monitoring wells. It is important that the region fill in any data gaps resulting from less than optimum monitoring systems. Initial monitoring system shortcomings were identified in the GSPs along with projects and management actions to correct them. We Hope each GSA will include within its GSP third year progress report, efforts and timetables to bring the monitoring well systems into operational states that allow a comprehensive understanding of each groundwater subbasin.



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The GSPs have left unanswered questions regarding the status and protection of GDEs and ISWs in each subbasin. Comprehensive monitoring programs are key to answering these questions. The three GSPs had different levels of ISW and GDE characterization, but all three were noted in the Department of Water Resources (DWR) approvals letters as needing more work to close data gaps. We hope that each GSA will include within its third year progress report efforts and timetables to address the areas of GDE and ISW concern. DWR summary concerns regarding each subbasin's deficiencies in this area are as follows.

DWR North Basin GSP approval letter: "The Plan acknowledges and identifies interconnected surface waters within the Subbasin. The GSAs proposes initial sustainable management criteria to manage this sustainability indicator and measures to improve understanding and management of interconnected surface water. The GSAs acknowledge, and the Department agrees, many data gaps related to interconnected surface water exist. The GSAs should continue filling data gaps, collecting additional monitoring data, and coordinating with resources agencies and interested parties to understand beneficial uses and users that may be impacted by depletions of interconnected surface water caused by groundwater pumping. Future periodic evaluations of the Plan and amendments to the Plan should aim to improve the initial sustainable management criteria as more information and improved methodology becomes available."

DWR South Basin GSP approval letter: "The Plan demonstrates an understanding of where data gaps exist and provides a description of measures to fill these data gaps. The GSP describes specific data gaps related to uncertainties in interconnected surface water locations and well information in its groundwater levels and quality monitoring networks. The Plan provides a management action to address these data gaps and commits to developing a plan, schedule, and budget for actions to address the data gaps by the first year of GSP implementation. (23 CCR § 355.4(b)(2).)

DWR corrective action from the Cosumnes GSP approval letter: GSAs "should consider addressing by the first periodic evaluation of the Plan" "Continuing to fill data gaps, collecting additional monitoring data, coordinating with resources agencies and interested parties to understand beneficial uses and users that may be impacted by depletions of interconnected surface water caused by groundwater pumping, and potentially refine sustainable management criteria."

As stated above, ISW and GDEs are of particular interest to ECOS, and areas of concern regarding them are often found along mutual subbasin boundaries. We understand that resource constraints are affecting GSA operations. However, while not all subbasins were



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fortunate enough to receive State grant funding, the obligation to close these gaps has not changed. We hope that more coordination and data sharing will enhance GSA abilities to make substantive progress in this critically important area.

GSA's are preparing their third annual reports, and the five-year plan updates are due in 2025. ECOS looks forward to an open, public process in the development and adoption of each subbasin's three year report as well as future annual reports and five year updates. We hope that these documents will fully disclose the North American, South American and Cosumnes subbasin plans and timing to address monitoring program shortcomings as well as shortcomings in understanding and protecting the region's GDEs and ISWs.

Thank you for your consideration of these suggestions and requests. ECOS appreciates all the work you are doing to implement SGMA for the benefit of the Sacramento area. We would appreciate your action to distribute this letter with our thanks to all of the GSA's involved in implementing the approved GSA's in our region. We would also appreciate hearing from you and the other GSA's regarding your efforts to address our concerns.

Ted Rauh  
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