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January 29, 2024

To: GSA Boards in the Sacramento Area - North, Central and Consumnes subbasin GSAs

North American Subbasin

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Cosumnes Subbasin

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Subject: Environmental Community Based Representation on GSA Boards

Groundwater management has taken a huge step forward with the Sustainable Groundwater Management Act (SGMA) and the formation of Groundwater Sustainability Agencies (GSA) throughout California. The Environmental Council of Sacramento (ECOS) is very supportive of the Sacramento Area GSA efforts to develop and begin implementation of their Groundwater Sustainability Plans (GSP) and feels the Region has done a good job of working through a multitude of technical issues. ECOS believes implementation of these GSPs requires close coordination between the GSAs, water purveyors, and the public as evidenced by our comments on the GSP annual reports to the State. One way coordination can be improved is through the inclusion of broader representation on GSA Boards of Directors.



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Implementation of SGMA to reach and maintain sustainable extraction levels by 2040, considering climate change impacts, requires several tradeoffs and decisions that affect public resources and public use. Under SGMA, these decisions are to consider the interests of all beneficial uses and users of groundwater and to “encourage the active involvement of diverse social, cultural, and economic elements of the population”.

Most GSA Boards are composed primarily of representatives from agricultural and public water agencies. These interests are often heavily represented on GSA boards because of their dependence on, and use of, groundwater resources. Public water agency representatives and large agricultural interests are focused on their critical water supply issues but are not usually charged with a mandate to represent a balanced environmental or public impact across an entire subbasin. Environmental and community based organizations who, by their nature, are concerned with these issues, are generally not represented on GSA Boards, despite the originating legislation that specifically calls out environmental and public interests in addition to the others (SGMA: These decisions are to consider the interests of all beneficial uses and users of groundwater and to encourage the active involvement of diverse social, cultural, and economic elements of the population).

Environmental and community-based stakeholders often have important and informed views of reasonable impacts and necessary protections – both to private wells, and to environmental resources, such as groundwater dependent ecosystems. Without a “seat at the table”, their voices are usually heard only in limited public comment at GSA meetings, or in the few public informational meetings. However, where these types of stakeholders are included on GSA Boards, issues are raised earlier, and discussed more fully as a Board. Significant and meaningful engagement can create more lasting and durable agreements, build public support, establish policies that are responsive and robust, protect against future lawsuits/challenges, and build relationships and trust among resource users.¹ A recent 2023 report, published in Nature (<https://www.nature.com/articles/s41467-023-39363-y>) looked at this dynamic and concluded that GSAs with wider representation were more likely to have more completely addressed the required range of SGMA issues.

Given the “new” nature of SGMA and the evolving nature of GSA responsibilities, boundaries, and interactions, we would like to encourage all GSAs, but particularly those in our Sacramento area, to consider including at least one public/environmental representative on the GSA Boards.

¹ Collaborating for Success: Stakeholder Engagement for Sustainable Groundwater Management Act Implementation, Collaborating for Success ii July 2015
Authors: Kristin Dobbin, Jennifer Clary, Laurel Firestone, Juliet Christian-Smith,



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There may be near term opportunities for several GSAs to accomplish board member additions as consolidations or reorganizations occur.

ECOS has individual members and member organizations that can provide thoughtful and considered input on these issues in each of the region's three subbasins, and ECOS is only one of a number of local organizations that GSA's can turn to for potential Board members. Given the typical number of current GSA board members, one or two public/environmental seats bringing the additional perspectives we suggest, will not diminish each GSA's local control – in fact, we believe their inclusion allows a more complete and stronger view of what the local stakeholder wishes truly are.

ECOS believes in this concept so strongly that we are cc'ing the Department of Water Resources. We hope that the DWR will encourage all GSAs to consider this approach, as we feel it will address a very distinct SGMA implementation gap.

Thank you for your consideration of this suggestion. We stand ready to discuss the inclusion of environmental/community board representation with you further, and to support your efforts to increase the inclusion and breath of your Boards.

Ted N. Rauh
Water Committee Chair

cc. Sacramento County Board of Supervisors
Department of Watter Resources