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ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

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July 22, 2024

Raiyna Villaseñor  
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Subject: Comments on June 18, 2024 Revised Notice of Preparation Regional Water Bank

Dear Ms. Villaseñor,

The Environmental Council of Sacramento provides the following comments on the subject Notice of Preparation (NOP) dealing with the proposed creation and operation of a Regional Water Bank (Project). We appreciate and commend the Regional Water Authority (RWA) for taking the steps now to expand the project scope.

Statements made and documents published by RWA during the Water Forum Agreement 2 development process seem to indicate the operation and scope of the Bank may be more broad than the scope contained in the initial NOP, and we concur in the need to revise it. By taking this public disclosure step now, the project may avoid potential procedural delays in the future.

Our first comment deals with Project goals. Project goals should be broadened to include the following areas:

- 1) Through effective management and operation, the Project should result in increased groundwater storage and higher groundwater levels within the affected groundwater subbasins than are likely to occur without the Project;
- 2) The Project should not harm existing and new groundwater wells; and,
- 3) The Project's management of deposits and withdrawals should not negatively impact but instead work to the overall advantage and improvement of Groundwater Dependent Ecosystems (GDE) and places of surface/groundwater interaction.

Our second comment deals with the Need for the Project. This section should emphasize that the Project is contributing to fulfilling multi-benefit needs. In addition to the needs already identified, this section should stress the Project's contributions to the Lower American River including the river's fish and environmental populations, and recreational values, as well as local rivers, creeks and streams that benefit from the higher groundwater table through increased surface/groundwater interactions. Groundwater-Dependent Ecosystems (GDEs), including all of the species that are dependent on them, should also be shown as beneficiaries.

Our third set of comments deals with the NOP's Project Description.

- 1) The Project limits its potential deposit size to 65,000 TAF. This amount does not seem correct given that RWA has indicated that more conjunctive use and banking is practical and is in discussion with the Bureau of Reclamation (Reclamation) regarding additional regional conjunctive use by RWA members and the potential use of this water and the Bank's services by Reclamation. These additional conjunctive use and banking operations in addition to other potential projects carried out in the region would drive Project deposits above the level currently stated in the NOP. The NOP and resulting environmental document should encompass all known and projected banking activity.
- 2) The Description indicates a potential maximum amount of water that annually may be extracted when conditions allow, and which may be subject to transfers. However, for the same logic stated above, the NOP and resulting environmental document scopes must include all known and potential deposit withdrawals and water transfers including those in discussion with Reclamation and other potential conjunctive use and water sources in the future. To this end we suggest that RWA conduct an assessment of the potential for Conjunctive use within the geographic area of the Project so that a full assessment of the potential impacts and mitigations from Bank operations can be included in the environmental document.
- 3) With regard to water transfers, the environmental document needs to include an evaluation of the potential benefits and impacts to the region from these transfers as well as an evaluation of the conditions under which these transfers will be made.
- 4) Brief mention is made to Reclamation's potential use of the Project. As requested above, the NOP and resulting environmental document need to fully explain Reclamation's potential range of uses of the Project and all resulting impacts and any mitigations needed. This assessment should also include any other potential Project participants, including entities from outside of the region. In addition, any potential issues of Project management and control brought about by Reclamation's or other entities' involvement in the Project should be identified and discussed.

We look forward to reviewing the Project environmental document and hope that it will address concerns we and others may have regarding how RWA and the Bank operator will be able to respond to Project participant operations that have unintended consequences to surface/groundwater resources or GDEs.

We look forward to our continued work with RWA and its members in the development and implementation of a Regional Water Bank.

Sincerely,



Ted Rauh  
Chair, Water Committee



Susan Herre AIA AICP  
President of the Board of Directors