ECOS
ENVIRONMENTAL
COUNCIL
OF SACRAMENTO
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October 21, 2026

To: Groundwater Sustainability Agencies in the North American Subbasin
Reclamation District 1001 GSA
Sacramento Groundwater Authority GSA
South Sutter Water District GSA
West Placer County GSA
Jim Peifer, Executive Director, Regional Water Authority

Subject: Comments on the North American Subbasin Amended Draft Groundwater Sustainability Plan (GSP)

The Environmental Council of Sacramento (ECOS) is a 501c3 nonprofit, with the mission to achieve regional and community sustainability and a healthy environment for existing and future residents. Member organizations of ECOS include: *350 Sacramento, Breathe California Sacramento Region, Environmental Democrats of Sacramento, Friends of Stone Lakes National Wildlife Refuge, International Dark-Sky Association, Physicians for Social Responsibility Sacramento Chapter, Sacramento Audubon Society, Sacramento Citizens' Climate Lobby, Sacramento Electric Vehicle Association, Sacramento Housing Alliance, Sacramento Natural Foods Coop, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes, Save the American River Association,* and *Sierra Club Sacramento Group*. Habitat 2020 is a coalition that works to protect the lands, waters, wildlife and native plants in the Sacramento region. The great Central Valley of California has been identified by the World Wildlife Fund as one of North America's most endangered eco-regions. Preserving its remaining open space and agricultural land is essential for sustaining native plants and wildlife and ensuring a high quality of life for ourselves and future generations. Member organizations of Habitat 2020 include: *Friends of Stone Lakes National Wildlife Refuge, Friends of Swainson's Hawk (FOSH), International Dark-Sky Association, Sacramento Area Creeks Council, Sacramento Audubon Society, Sacramento Heron and Egret Rescue, Sacramento Valley Chapter of the California Native Plant Society, Save Our Sandhill Cranes, Save the American River Association,* and *Sierra Club Sacramento Group*. Habitat 2020 also serves as ECOS' Habitat and Conservation committee.

ECOS commends the effort of the North American Subbasin (NASb) Groundwater Sustainability Agencies (GSAs), the GSP Working Group, and their consultants for involving the public and preparing the Amended Draft GSP.

ECOS submitted comments on October 14, 2021, in response to the NASb draft GSP to present technical suggestions, request additional details, identify areas of weakness in the plan, and acknowledge communications with RWA staff on future plans that address our concerns. These comments specifically focused on the need to 1) incorporate up-to-date climate data and projections– including accurate reference to the American River Basin Study (ARBS), the Delta Stewardship

Council's Sacramento-San Joaquin Delta Climate Change Vulnerability Assessment work (Delta Adapts: Water Supply Technical Memorandum May, 2021), and related studies– to justify and improve the use of the central tendency model in the GSP; 2) include water demand reduction strategies in demand management plans; 3) incorporate a public review component to evaluate and refine past water banking, accounting, criteria for withdrawal, and potential impacts to adjacent subbasins; 4) consider the development of a vulnerable shallow well program, similar to the one the South American Subbasin is developing; and 5) consider additional commitments to include members of the public– particularly regional stakeholders– in the monitoring work, development of Water Bank operating criteria, and through continued GSP evaluation and implementation work. Additionally, we expressed gratitude for the NASb GSP's detailed Projects and Management actions, as well as its appropriate sustainable management criteria, which established a more conservative approach to groundwater and surface water levels than the other subbasins in the region.

We have reviewed the North American Subbasin Amended Draft Groundwater Sustainability Plan (GSP) and urge the North American Groundwater Sustainability Agencies to consider the following comments regarding our comments on the initial GSP:

1. With regard to our initial concerns regarding the use of up-to-date climate change modeling, we note the State of California has released revised climate modeling information for the region, and the Regional Water Authority (RWA) recently completed a study on the American River Watershed's climate resiliency. In addition, the Water Forum Agreement 2050 includes the importance of climate change considerations in water resource planning and the region, in part through the RWA's proposed regional water bank, is intending to increase the use of groundwater conjunctive use. All these efforts point to the continuing need to focus GSA efforts on future forecasts of the frequency of wet and dry years as underpinnings for recharge projections rather than relying on past records of regional climate. Staying abreast with the latest climate change forecasting tools and projections are critical components for future subbasin planning and operation. We encourage the GSAs to continue their efforts to focus on the future and to continue the coordination with the Water Forum, RWA (including the regional water bank), and neighboring groundwater subbasin GSA's.

2. With regard to demand management strategies, while we understand the reliance on water purveyor Urban Water Management Plans (UWMP) and that new plans are forthcoming, these plans do not address the potential water conservation and demand management actions that can be taken by groundwater users who are not served by water purveyors. Going forward, we would like to work with the GSAs to explore these demand management opportunities.

3. We commend the GSAs for their public participation and review commitments. We also appreciate their participation in coordination meetings and briefings at Water Forum meetings.

4. We commend the GSA's efforts to develop and implement a vulnerable shallow well program. We continue our interest in the GSA's working with the County of Sacramento and adjacent counties within the Subbasin to develop and implement well standards that protect the GSA's monitoring systems, existing shallow wells, groundwater dependent ecosystems, groundwater/surface water interface, and the sustainability of the Subbasin.

5. We applaud the NASb GSA for taking a more conservative approach to the Sustainability Management Criteria than other plans in the region. We encourage the GSAs to reach out to the other GSAs in the American River groundwater basin to encourage them to adopt a similar set of protective measures.

6. We support the improvements made to address gaps in the monitoring network (section 4.4.4). We would like to acknowledge and express our support for the additional monitoring wells installed to address data gaps identified in the 2021 GSP. We encourage GSAs to strive for monitoring networks with 100% coverage of the subbasin. In addition, with the proposed operation of the regional water bank, there may be a need for additional monitoring wells. We look forward to the assessments and updates that will be made to the representative monitoring network during the future Periodic Evaluations and/or next GSP amendment.

7. We recommend that the NASb GSP incorporate transducers and telemetry systems in all their monitoring wells to further improve timely monitoring of groundwater conditions throughout the subbasin.

Thank you for considering these comments and for your continued and collaborative engagement with stakeholders through the Water Forum. ECOS appreciates the opportunity to engage in this process and to support efforts for regional groundwater sustainability. Please contact Ted Rauh (tnrauh@att.net) or Luz Lim (luzlim@live.com) with questions or further communication.

Sincerely,

Ted Rauh
Chair of ECOS Water Committee

Luz Lim
Policy Analyst