ECOS
ENVIRONMENTAL
◆ COUNCIL ◆
OF SACRAMENTO

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October 10, 2026

To: Groundwater Sustainability Agencies in the South American Subbasin
Northern Delta Groundwater Sustainability Agency
Omochumne-Hartnell Water District
Reclamation District 551
Sacramento Central Groundwater Authority
Sacramento County

Subject: Comments on the South American Subbasin Groundwater Sustainability Plan (GSP) 2027 Periodic Evaluation

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, also a 501c3 associated with ECOS 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 serves as ECOS' Habitat and Conservation committee.

ECOS commends the effort of the South American Subbasin Groundwater Sustainability Agencies (GSAs), the GSP Working Group, and their consultants for involving the public and in preparing the GSP 2027 Periodic Evaluation.

ECOS submitted comments on August 4, 2021, in response to the 2021 Groundwater Sustainability Plan Public Draft to present technical suggestions, request additional details, and identify areas of weakness in the plan. Although some of these comments were addressed in the 2022 South American Groundwater Sustainability Plan, ECOS submitted comments on April 14, 2022, to outline outstanding deficiencies in the 2022 plan. These comments specifically focused on the need to 1) incorporate up-to-date data and trends related to the state of the climate; 2) an action trigger set to go off when groundwater levels reach the 2015 benchmark elevation, rather than only initiating corrective action after three years of minimum threshold exceedance; 3) develop strategies for management of pumping

and sustainable yield through drought cycles; 4) develop demand reduction strategies; and 5) include management actions related to groundwater transfer and banking activities.

We have reviewed the South American Subbasin Groundwater Sustainability Plan (GSP) 2027 Periodic Evaluation and urge the South American Groundwater Sustainability Agencies to consider the following comments:

1. The GSP Sustainable Management Criteria (SMC) does not effectively protect the subbasin from sustainable criteria exceedances.

   Section 3.1 defines undesirable results relating to chronic lowering of groundwater levels as, "More than 25% of representative monitoring wells fall below minimum thresholds (MTs) for three consecutive years." The minimum threshold is described to have been set at "historical minimum elevations to protect sensitive uses and users and avoid undesirable results," and the measurable objectives and milestones were set to reach average groundwater levels as "observed from January 2015 to June 2021," with higher measurable objectives set for the Harvest Water area to account for gradual recharge.

   In our 2021 and 2022 comment letters, we explain that a sustainability criteria for groundwater levels should prescribe corrective action well before three years of consecutive minimum threshold (MT) failure. If corrective action is only triggered after three years of continuous MT exceedance for more than 25% of representing monitoring wells, then it is likely that parts of the subbasin would have experienced sub-MT levels for longer than three years before 25% of the representative wells reached sub-MT levels for three consecutive years. Additionally, the corrective action would likely take another year or more for implementation. At least a quarter of the subbasin would thus experience sub-MT groundwater levels for a minimum of 4 years, with some areas experiencing these levels even longer.

   In addition to its role in supporting a sustainable groundwater supply, the maintenance of sustainable groundwater levels is critical to the health of Groundwater Dependent Ecosystems (GDEs) and Interconnected Surface Waters (ISW). Significant and prolonged depletion of groundwater levels could also lead to otherwise avoidable impacts on shallow wells. Proactive management of sustainable groundwater levels will be increasingly important as conjunctive use increases in the region with the full implementation of groundwater banking and groundwater transfers are introduced.

   We recommend that the SASb GSP improve the sustainability management criteria related to lowering of groundwater levels. ECOS supports the approach taken by the North American Subbasin (NASb). NASB established an approach that utilizes a one-year exceedance requirement, which is fully described in the North American Subbasin GSP. A corrective action trigger after one year of MT exceedance would allow for corrective actions to be made in a timeline that would meaningfully support the health of GDEs and ISWs, as well as support the overall maintenance of sustainable groundwater levels in the subbasin.

2. Monitoring network improvements are necessary for a comprehensive evaluation of groundwater levels in the subbasin.

   ECOS commends the efforts the South American Subbasin GSAs have made to improve the subbasin's monitoring network. Specifically, we commend the installation of transducers and telemetry systems to RMP_03 and RMP_05, as well as the future plans to improve monitoring well coverage in underrepresented areas. Although the GSP states that the current spatial coverage of 88.6%, and the projected 2027 spatial coverage of 89.1%, are adequate for evaluating groundwater conditions across the Subbasin, we urge the GSAs to consider the implementation of more monitoring wells. We are not yet satisfied that groundwater impacts and interactions are fully understood with respect to GDEs and ISW. In addition, groundwater banking and increased conjunctive use may demand additional monitoring wells to fully understand their impacts on the subbasin. There has not been comprehensive coverage of groundwater levels in the Subbasin since the establishment of the GSP. **ECOS recommends that the GSP include plans and intent towards achieving 100% coverage of the Subbasin coverage as well as full coverage of GDEs, ISW, and future groundwater banking activities.**

3. Standards must be developed for new domestic wells.

   ECOS commends the South American Subbasin GSAs for their work to address gaps in the inventory of existing domestic wells, including their outreach to, and inclusion of, domestic well owners in monitoring practices. Additionally, we commend the GSAs for coordinating with Sacramento County and other agencies in the review of proposed well permits. We understand that the State is proposing new well standards and that the County of Sacramento is delaying any modifications to its standards until these new state requirements are completed. However, if this state effort is slow developing, it may not make sense to continue to allow wells to be developed without due protection for existing wells and/or the groundwater monitoring system. **We recommend that this or a future GSP include requirements that address all new well development to ensure new wells are constructed and documented to current standards, are sited and constructed to take into account existing wells and the subbasin's monitoring system, and that the GSAs are fully apprised of new well construction and capacity.**

Thank you for your consideration of these comments. 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

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