

July 21, 2021

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Re: SASb Draft Groundwater Sustainability Plan

The Sheldon Community Association (SCA) and the Greater Sheldon Road Estates Homeowners Association (GSREHA) defend the rural values and interests of residents of the Elk Grove rural residential area zoned by the city for agricultural-residential settlement. Our legal right to drinking water, the value of our properties and the crops and animals we raise on them, and the health of magnificent native oaks and other plants and wildlife we seek to maintain can be served by wise and proper groundwater management under SGMA. Or, they can be undermined by short-sighted and environmentally exploitative policies and practices faulty management fails to control. We submit our following observations on the draft Groundwater Sustainability Plan recently released by SCGA and other subbasin GSAs for public comment in the hope that eventual revisions to it will better serve the needs of the Elk Grove rural residents whose rights and values we help protect. There are four main issues we would like to call to your attention.

Issue 1: The number of functioning domestic wells

The 5400 acres within the city of Elk Grove zoned Agricultural Residential, a fifth of its land area, at present contain over 1,200 occupied residences, all of them dependent for water on roughly the same number of domestic wells. This may be the principal dense concentration of domestic wells in the SCGA area, and perhaps one of the largest in the South American subbasin. Virtually all these wells are fully functioning and currently supply their associated residences with adequate water. The dramatic growth of this area, including in planned developments, dates back to at least the 1970s and 80s. Hundreds of wells over 30 or 40 years old, with some over 50, are maintained by their owners and are without visible deterioration. The area water table and geological formations have been so stable that competently constructed wells have faced few threats. Well and pump purveyors serving our area say that residential well failures are rare. The Ag-Res area is subject to both City of Elk Grove and Sacramento County governance, plus community vigilance from CC&Rs and our two long active neighborhood associations established to monitor and defend the quality of rural life. This is not an environment in which a rash of well failures would go unnoticed. All observable evidence suggests that our domestic wells of all ages are generally performing adequately; we see no evidence to the contrary.

It is therefore with some surprise and puzzlement that we find in the recently released SASb draft Groundwater Sustainability Plan, particularly in Appendix 3-A, the suggestion that residential wells should be attributed an expected functional lifetime of something around 30 or 40 years, with the implication being that older wells should not be counted as viable or provided protection. If applied to Elk Grove, that policy could exclude hundreds of obviously functioning wells unproblematically providing water to their residences. Obviously, nobody knows the actual life span of our Elk Grove rural area domestic wells, since virtually all, including some several decades old, are still functioning and have not yet begun to peter out. There is no evidence on which to base a life expectancy estimate until we begin to see a failure pattern that has yet to appear. The only logical policy at this time is to accept the valid presence of all domestic wells in the Elk Grove rural residential area for both identification and protection. This will considerably raise what we understand to be the current SASb estimate of only around 700 eligible wells in the entire subbasin---only two thirds the number we observe just within the city limits of Elk Grove alone. Curious about how the Subbasin working group could have come up with an estimate so obviously at odds with observable fact in our Elk Grove rural area, we consulted one of the main databases they cite---a website of well completion reports maintained by DWR. An initial look at the site suggests to us that the data it contains are so incomplete and so biased toward new wells that these data probably are worse than useless. Given the lack of credible evidence supporting any imputed average well life span in our Elk Grove rural area, plus strong *prima facie* evidence that virtually all wells of all ages, over 1,100 in number, are still working acceptably, we request that every well serving an occupied residence be counted as functional. There simply is no empirical justification for doing otherwise. The burden of proof is clearly on those who would impose a well lifespan criterion.

Issue 2: Minimum Threshold

The draft GSP proposes setting a subbasin-wide minimum threshold groundwater level equivalent to the groundwater level in the fall of 2015, a year of severe drought. That level is not the same everywhere relative to current groundwater levels, this year also being a severe drought year. We have not found a recorded 2015 groundwater level for the Elk Grove rural residential area, but anecdotal evidence from well and pump purveyors and other observers suggests that the groundwater level in 2015 was so close to the current ground level in 2021 that the difference is negligible. In the absence of solid evidence of a substantial difference, we propose that the groundwater level as measured in fall of 2021--under effects from the current drought---be adopted as the official recognized minimum threshold pertaining to the Elk Grove rural residential area. It is important to have a solid beginning point measurement, for the Elk Grove rural residential area is projected (Appendix 3-A, p. 17) to suffer some of the subbasin's most pronounced groundwater level decline (15 feet) even after accounting for project and management actions to retain water. One of the reasons for this especially severe decline is that the Elk Grove rural residential area does not substantially benefit from any such project or management action now planned. Nor are there any announced intentions to reinforce the especially impacted aquifers in this area. Hence, some of SCGA's, and the subbasin's, greatest groundwater table decline is projected to occur precisely at the location of its largest and most dense collection of shallow domestic wells, with no remedial action at the spot even considered. This is a recipe for looming disaster, and one practical means to help prevent it is to

designate a minimum threshold for this area no deeper than the current water table at the time the GSP is proposed.

Issue 3: Well monitoring

The large cluster of domestic wells and variety of conditions in the Elk Grove rural residential area suggest a need for denser well monitoring than is currently being considered for the subbasin as a whole. It is generally agreed between our associations and the technical working group advising the draft GSP that such enhanced monitoring will be useful, and that it must be conducted through organized community effort in communication with SCGA and perhaps whatever team is working across the subbasin. Because of the specificity of our area of interest---the designated rural residential area established within the city limits of Elk Grove---we have decided to organize under our auspices an independent community well monitoring project within and limited to the Elk Grove rural residential area, of course maintaining communication and cooperation with SCGA and related technical staff as appropriate.

Issue 4: Well protection program

We request that any GSP adopted by SCGA and submitted for approval to DWR include the guarantee of a well protection program that deepens or replaces free of cost to owners all domestic wells within the Elk Grove rural residential area in which groundwater levels are judged in danger of sinking to levels less than 30 feet above the bottom of the existing well. Since at the time of this writing all known domestic wells in this area are functioning adequately with proper groundwater access, and since it is unlikely that the net water use of domestic well owners as a group surpasses the total rainfall they typically receive on their Ag Res acreage in a season, and since future conditions of groundwater availability and quality are likely to reflect management policies, practices and decisions taken by SCGA, that agency should from the date its GSP enters into force be responsible for maintaining full access of each and every Elk Grove rural residential area well to a sufficient groundwater supply. Well owners are responsible for maintaining well structure and equipment in good repair.

If you have any questions, we would be pleased to take them up with you.

Sincerely,

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