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August 18, 2021

Mr. John Woodling
Sacramento Central Groundwater Authority
4321 First Street
Anytown, State ZIP

Dear Mr. Woodling,

I appreciate the opportunity to comment on the Draft Groundwater Sustainability Plan for the South American subbasin. I provide my comments to the Draft GSP as a public member who has taken an interest in actively participating in the Sustainable Groundwater Management Act to understand the many ancillary programs supporting the SGMA in order to provide public input supportive of projects and management actions that are inclusive of the rural community and protective of private domestic wells. My comments are as follows:

Section 4. Projects and Management Action,

4.1 History and Context

8. Regional Water Reliability Plan prepared for Regional Water Authority—2019

Neither a discussion of the RWA Reliability Plan nor an overview of the general concepts of water banking were provided in the Public Outreach and Engagement Meetings or workshops conducted by SCGA or OHWD. It is my understanding water banking is an overarching goal in the SASb for both SCGA, and OHWD. There is the potential to participate in a regional water bank in the SASb facilitated by staffing of SCGA by SGA and RWA which is currently under consideration. In my opinion there was sufficient time and opportunity for the public to be informed about water banking in the SASb, but the conversation seem to get stuck on SGMA 101. The public requires an overview of water banking before GSP adoption.

4.2 Projects and Managements Actions under SGMA.

In my understanding, recycled water projects, recharge projects, conjunctive use and water banking are the basis for achieving sustainability in the SASb. Water quality implications of these innovative new concepts and projects were not appropriately disclosed to the large community of shallow well owners whose wells could potentially be impacted by poor water quality resulting from implementing these projects.

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Recently, in attempting to compare recent water tests results from our private well to wells locations similar to my ag res parcel, directly adjacent to agriculture, I found there were no monitoring wells in the SASb monitoring network or the GAMA network with which I could compare results. A monitoring network, of shallow wells including water quality monitoring is a data gap in the GSP that needs to be addressed. Existing water monitoring data, including water quality data needs to be readily accessible to owners of shallow wells. GSAs that are participating in groundwater level monitoring and/or water quality monitoring programs through the State Water Board, DWR or any County or State Agency must be required as Public Agencies to be transparent and share their data with the public by making it readily accessible to the public on their websites. A good example is the UC Davis Well Monitoring project in OHWD.

Water quality should be as an element of the shallow well monitoring network PMA with wells located in a variety of areas throughout the rural area in the SASb. Shallow monitoring wells should be included in GSP annual reports and the five year update of the GSP as the data is gathered and quantified and made available for inclusion.

4.4.1 Harvest Water

Harvest Water is an innovative and costly recycled water project, in my opinion, designed for agriculture and environmental interests with targeted outreach to specific participants and potential participants in the Harvest Water program. There is no evidence of significant outreach to the general public by the public agencies involved since 2011 to the present as the design and construction phases begin. An overview of Harvest Water Program by Regional San introduced the project to the General Public in the last few Public Engagement and Outreach Meetings, There are lots of moving parts to the project and the public has not been made aware of the entire scope of the Harvest Water Program and financing for the project.

Section 4.4.3 Regional Conjunctive Use Program

4.4.3.8 Estimated Cost and Funding

Funding of these highly innovative concepts and innovative technologies planned for the SASb carry big price tags for construction, operated and ongoing maintenance. Transparency has been lacking from GSAs planning and developing these projects

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and more detailed information is required in this GSP for public review and comment. Public/Private Partnerships as potential funding mechanisms for development and operation of many of these projects in the planning stages has not been discussed in Public Outreach and Engagement meetings . It is my opinion Public/private partnerships are required to be addressed as a matter of The Public Trust.

4.4 Near Term Projects

Additional detail and information needs to be provided in the GSP for public review and comment which would include proposed funding sources. For instance the Interconnection between the City of Folsom and Omochochumne-Hartnell Water District at the Folsom South Canal Project. The public should be provided more than a few words about this project which a review of public records and LAFCo documents in my opinion, indicate proposed construction and operation of a direct potable reuse recycled water facility in OHWD. At least those of us in the district should know about this project.

Section 4.7 Management Actions

4.7.1 Shallow/vulnerable Well Protection Program

There is a large ag res presence in the SASb dependent on private individual shallow wells as their sole source of drinking water. Through Public Outreach and Engagement SCGA successfully reached a large number of these rural residents who expressed their great interest in having a Shallow Well Protection Program.

There have been numerous presentations at Public Engagement Meetings, Ag res Workshops and at a recent SCGA Board meeting to articulate the many decisions and considerations that have to be addressed in developing a Well Protection plan, including the lack of funding. There has been no decision by the GSAs in the SASb to move forward with a Well protection Plan for the ag res wells owners. I understand in order to be funded in the GSP, there has to be an identified Project . I suggest this section of the GSP be amended to include: a formal decision by SCGA and the affected GSAs in the SASb supporting development of a Well Protection Plan Framework; a Project framework be developed for inclusion in the current GSP that includes application for grant funding currently available from DWR and a request for technical support and funding from DWR for development of a Pilot Well Protection Plan for the SASb.

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Section 5 Plan Implementation

The governance structure for the 5 GSAs in the SASb has not been successfully negotiated after 6 years of meetings, 2x2s, ad hoc committees., MOUs... At this point in time when the 60 day period of public review is closed the GSP is missing a governance agreement, a funding structure, a framework for management and coordination for shared projects ,as well as funding plans for individual GSAs for public review and comment, Section 5 —Plan Implementation is reliant on these agreements between the 5 GSP. The public requires a public review and comment period on these essential agreements.

Finally, a few comments on the August 17, 2021 OHWD Board Meeting Agenda item 7 .Expansion —a public discussion of OHWD possibly pursuing in the coming months an expansion of its GSA boundaries through DWR —annexation of thousands of acres of agricultural land currently in SCGA territory going through the LAFCo process in the next few months, including CEQA, —-a transfer of assessments and fees recently levied by SCGA for the area —and the removal of the Ag Director position from the SCGA Board — —-all being done in conjunction with the review and response to the GSP draft comments,approval and adoption of the current GSP and DWR final plan submittal by the end of January 2022 —and

OHWD pursuing these actions at this time seems a distraction and, in my opinion, jeopardizes the SASb GSP process that is at a critical juncture. The discussion of 22,000 - 33,000 acres being added to OHWD, and even the idea of crossing into San Joaquin County adds a whole new dimension to “Local Control.” There was an OHWD comment that ‘this expansion could make us very powerful ‘ leads me to question SGMA’s intent with respect to Local Control. and was the intent really to facilitate power and not to facilitate public engagement

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Implementation of the GSP in the SASb can certainly not occur under these chronic unstable circumstances of never ending negotiations, changing governance scenarios and GSA boundary expansions and the overall inability to reach an agreement on governance and funding for the GSP.

When the stakes get too high it may be better to stop negotiating,

Thank you for the time and effort put into this GSP by SCGA Staff and Board members and the Consultants, who put forth a big successful effort to engage the public. You have all been generous with your time and your expertise. .

Sincerely,

Suzanne Pecci
