

August 18, 2021

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To: South American Subbasin Groundwater Sustainability Agencies
c/o Jennifer Lau Larsen, Kennedy/Jenks Consultants

SUBJECT: Comments on the Draft Groundwater Sustainability Plan
For the South American Subbasin

Delivered via electronic mail to: SASbGSP_Comments@kennedyjenks.com

Dear Ms. Larsen:

Thank you for the opportunity to review the public draft of the South American Subbasin Groundwater Sustainability Plan (GSP). The Sacramento Regional County Sanitation District (Regional San) is actively engaged in the development of the GSP through participation on the GSP Working Group. We have submitted detailed comments on the review draft provided to the Working Group and have also actively participated in Working Group meetings, including providing briefings and responding to questions on the Harvest Water Program.

We appreciate the GSP incorporating Harvest Water as a project and management action that contributes to the sustainability of the basin. Regional San is developing Harvest Water to provide a safe and reliable supply of tertiary-treated recycled water for agricultural uses, reducing the need for groundwater pumping in the region, supporting habitat protection and enhancement efforts, and providing near-term benefits to the Sacramento-San Joaquin Delta.

We believe Harvest Water is an exceptional opportunity to proactively restore and manage groundwater, while improving stream flows in the lower Cosumnes River, enhancing riparian habitats and wetlands, sustaining prime agricultural lands, and improving regional water supply reliability through conjunctive use. By delivering recycled water in-lieu of groundwater pumping, Harvest Water will increase groundwater storage by approximately 245,000 acre-feet within 10 years. This in-lieu recharge is expected to raise groundwater levels up to 35 feet in the center of the Harvest Water Program area, and 15 to 25 feet in other parts of the groundwater basin in the vicinity of the Program.

The GSP's measurable objectives for groundwater levels incorporate the estimated increases in groundwater levels in the vicinity of the Harvest Water Program. We believe this is not only appropriate, but vital to ensuring that the

Comments on Draft
Groundwater Sustainability Plan
for the South American Subbasin
August 17, 2021
Page 2

on-going management of groundwater in the basin supports the success of the Harvest Water Program. Regional San plans to continue our involvement in GSP development and implementation to ensure that Harvest Water benefits are realized in the form of elevated groundwater levels, protection of groundwater dependent ecosystems, and the related ecological benefits.

We are available to provide additional information on the Harvest Water Program as needed and look forward to continuing our involvement as the GSP is adopted and implemented.

Sincerely,



Terrie L. Mitchell
Manager, Legislative & Regulatory Affairs
Manager of Harvest Water Administrative Program Management Office
Sacramento Regional County Sanitation District (Regional San)

cc: Tom Grovhoug, Larry Walker Associates, tomg@lwa.com
John Woodling, GEI Consultants, jwoodling@geiconsultants.com