

Commenting Organization	Comment By	Date of Comment	Section/ Appendix #	PDF Page Number	PDF Line Number or Figure Number	Comment
City of Elk Grove	Amittoj Thandi	7/29/2021	Executive Summary (ES)	28	361	Replace "safety" with "safely"
City of Elk Grove	Amittoj Thandi	7/29/2021	1.1	4	34	Replace "west" with "southwest"
City of Elk Grove	Amittoj Thandi	7/29/2021	1.1	4	35	Recommend including Figure 2.1.2 here
City of Elk Grove	Amittoj Thandi	7/29/2021	1.2	8	127	Replace "South American Subbasin" with "SASb". This is typical throughout the GSP.
City of Elk Grove	Amittoj Thandi	7/29/2021	1.4.1.1	9	155	Add (SCGA)
City of Elk Grove	Amittoj Thandi	7/29/2021	1.4.1.1	9	160	Seven public agencies not nine as listed?
City of Elk Grove	Amittoj Thandi	7/29/2021	1.4.1.1	10	189	Replace "[Month/Year]" with actual dates
City of Elk Grove	Amittoj Thandi	7/29/2021	1.4.1.2	10	196	Add (NDGSA)
City of Elk Grove	Amittoj Thandi	7/29/2021	1.4.1.3	11	225	Add (OHWD)
City of Elk Grove	Amittoj Thandi	7/29/2021	1.4.1.3 and 1.4.1.5	11 and 12	237 and 267	Same addresses (not sure if this is an error)
City of Elk Grove	Amittoj Thandi	7/29/2021	1.4.1.5	12	253	Add (SRCD)
City of Elk Grove	Amittoj Thandi	7/29/2021	1.5.2	17	395	Should read "GSPWG"
City of Elk Grove	Amittoj Thandi	7/29/2021	1.5.3	17	401 and 405	Replace "South American Subbasin" with "SASb". This is typical throughout the GSP.
City of Elk Grove	Amittoj Thandi	7/29/2021	2.1.2.1	10	48	Replace "west" with "southwest"
City of Elk Grove	Amittoj Thandi	7/29/2021	2.1.2.1	12	Figure 2.1-3	What about RD-551 (as shown in figure 1-1)?
City of Elk Grove	Amittoj Thandi	7/29/2021	2.1.2.5	17	110-111	The tribal land is not shown on Figure 2.1-6
City of Elk Grove	Amittoj Thandi	7/29/2021	2.1.2.7	21	145-147	This statement is concerning since there are numerous wells in the rural Elk Grove area that were not included in this analysis. Based on conversations with domestic well owners and the ag-res community in Elk Grove, these wells are performing adequately and hundreds of wells will be excluded from this analysis due to the current well selection criteria. The GSP should recognize and consider all functioning and active wells within the SASb.
City of Elk Grove	Amittoj Thandi	7/29/2021	2.1.8.1	46	401	Add "majority of"
City of Elk Grove	Amittoj Thandi	7/29/2021	2.1.8.1	46	411	Was TCE defined in this section? If not define it here
City of Elk Grove	Amittoj Thandi	7/29/2021	2.1.8.2	50	498	Was PCE defined in this section? If not define it here
City of Elk Grove	Amittoj Thandi	7/29/2021	2.1.8.3.1	58	630	Replace "successfully" with "successful"
City of Elk Grove	Amittoj Thandi	7/29/2021	2.2.5.3	99	1474	Was TDS defined in this section? If not define it here
City of Elk Grove	Amittoj Thandi	7/29/2021	2.2.5.3	99	1479	Missing "
City of Elk Grove	Amittoj Thandi	7/29/2021	2.2.5.3	99	1511	Delete "total dissolved solids"
City of Elk Grove	Amittoj Thandi	7/29/2021	2.3.4	159	Figure 2.3-36	There are several wells in the Elk Grove area with Arsenic levels above the MCL. What is the cause of these elevated levels?
City of Elk Grove	Amittoj Thandi	7/29/2021	2.3.4	159	Figure 2.3-36	There are several wells in the Elk Grove area with Arsenic levels above the MCL. What is the cause of these elevated levels?
City of Elk Grove	Amittoj Thandi	7/29/2021	2.3.4	161	Figure 2.3-38	There are several wells in the Elk Grove area with Hexavalent Chromium levels above the MCL. What is the cause of these elevated levels?
City of Elk Grove	Amittoj Thandi	7/29/2021	2.3.8	175		There is no mention of a plan to address the data gaps (reference Section 5.1.2)
City of Elk Grove	Amittoj Thandi	7/29/2021	2.4.2.3	198	2857	Typo "waterwater"
City of Elk Grove	Amittoj Thandi	7/29/2021	2.4.2.1-2.4.2.4	190-202		Check all the inflow and outflow data; while spot checking some numbers don't add up.

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City of Elk Grove	Amittoj Thandi	7/29/2021	2.4.3	203	2936	States "THIS SECTION IS UNDER DEVELOPMENT". When will this section be updated?
City of Elk Grove	Amittoj Thandi	7/29/2021	3	5	29	Delete "are"
City of Elk Grove	Amittoj Thandi	7/29/2021	3.2	7	85	Delete "when"
City of Elk Grove	Amittoj Thandi	7/29/2021	3.2.1.3	9	188	The following statement "...rural residents may be faced with the significant financial burden of well rehabilitation."; reinforces the statement earlier that there are numerous wells in the rural Elk Grove area that were not included in the analysis and should be.
City of Elk Grove	Amittoj Thandi	7/29/2021	3.3.1.1	19	541	In reference to the minimum threshold development and criteria, since current (2021) groundwater levels are so similar to 2015, why can't the 2021 groundwater levels be used in the GSP analysis?
City of Elk Grove	Amittoj Thandi	7/29/2021	3.4.5	57	1178-1180	What are the contributing factors to the decline of groundwater levels in Elk Grove? How does the GSP address this decline?
City of Elk Grove	Amittoj Thandi	7/29/2021	4.2	7	99-100	Why is this sentence highlighted?
City of Elk Grove	Amittoj Thandi	7/29/2021	4.7.1	42	754-757	In conversations with domestic well owners/the ag-res community, we were informed of how important the well protection program is to domestic well owners. It is recommended that further coordination be planned with the ag-res community and other stakeholders within the SASb to develop an equitable and sustainable well protection program.
City of Elk Grove	Amittoj Thandi	7/29/2021	5.4	13	343	Update "HDR will provide additional information to support this section of the GSP.". Has this been provided by HDR?
City of Elk Grove	Amittoj Thandi	7/29/2021	Appendix 3-A	11		Correct "Error! Reference source not found".
City of Elk Grove	Amittoj Thandi	7/29/2021	Appendix 3-B	13 and 22		Correct "Error! Reference source not found".
City of Elk Grove	Amittoj Thandi	7/29/2021	Appendix 3-C	55		Replace "Arial" with "Aerial"
City of Elk Grove	Amittoj Thandi	7/29/2021	Appendix 4-A	4		Change status of project 42 to "Not Started"
City of Elk Grove	Suman Singha	8/16/2021				City of Elk Grove Planning Commissioner Suman Singha provided a comment letter via e-mail on August 16, 2021.
City of Elk Grove	Suman Singha, PhD	8/16/2021	Section 2		Table 2.1-7 and Figure 2.1-12	Table 2.1-7 CDEC Flow Stations in SASb lists 4 active and 1 inactive sensor. The corresponding Figure 2.1-12 lists 5 active and 3 inactive sensors; with one active sensor being outside the SASb.
City of Elk Grove	Suman Singha, PhD	8/16/2021	Section 2	2-194	2908	I believe the word should be "with" not "without"
City of Elk Grove	Suman Singha, PhD	8/16/2021	General			It is heartening to learn that there is no significant aquifer drawdown in the SASb and future management should ensure long term sustainability.
City of Elk Grove	Suman Singha, PhD	8/16/2021	General			It is equally heartening to learn that the contaminant plumes at Mather AFB, Aerojet and Kiefer Landfill are being closely monitored and that the remediation plans are working.
City of Elk Grove	Suman Singha, PhD	8/16/2021	General			However, I do have a major concern that the CoSANA projections are based on past and current parameters. Given that climate change is a reality, I believe the model should also include a protracted/severe drought scenario that has the potential of occurring; especially when we consider the 20- and 50-year timelines for the plan.

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City of Elk Grove	Suman Singha, PhD	8/16/2021	General			Although outside the scope of this report, I believe we need to start considering water as a finite and precious resource. Change in consumer behavior regarding water conservation and usage is going to be an important component of this. Part of this should include tiered pricing for water. Action on this is needed at all levels, else the scenario playing out in Mendocino will no longer be the exception but the rule.

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8105 Peak Forest Way  
Elk Grove, CA 95757

August 16, 2021

Jennifer Larsen  
[comments@kennedyjenks.com](mailto:comments@kennedyjenks.com)

Dear Ms. Larsen,

I believe it is important to provide some context as why I am providing comments on the SASb GMP. In my role as a new Planning Commissioner in the City of Elk Grove, I am interested in where the city is getting its water and also its long-term sustainability. This becomes especially important given the challenges of water availability in the western US as eloquently presented in *The West Without Water* by B. Lynn Ingram and Francis Malamud-Roan (2013, Univ. of California Press). I met with Mr. Jeff Werner, PE, Director, Public Works and Ms. Kristin Parson, PE on August 2, to get the conversation started and Ms. Parsons suggested I read the SASb GMP and provide my comments. Given my background is in plant science/plant biotechnology and not hydrogeology, reading this document was both interesting and educational.

My compliments to all those who contributed towards putting together this Plan. It is a comprehensive document with extensive supporting data.

Specific Comments:

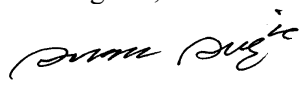
- Table 2.1-7 CDEC Flow Stations in SASb lists 4 active and 1 inactive sensor. The corresponding Figure 2.1-12 lists 5 active and 3 inactive sensors; with one active sensor being outside the SASb.
- Line 2908: I believe the word should be “with” not “without”

General Comments:

- It is heartening to learn that there is no significant aquifer drawdown in the SASb and future management should ensure long term sustainability.
- It is equally heartening to learn that the contaminant plumes at Mather AFB, Aerojet and Kiefer Landfill are being closely monitored and that the remediation plans are working.
- However, I do have a major concern that the CoSANA projections are based on past and current parameters. Given that climate change is a reality, I believe the model should also include a protracted/severe drought scenario that has the potential of occurring; especially when we consider the 20- and 50-year timelines for the plan.

Although outside the scope of this report, I believe we need to start considering water as a finite and precious resource. Change in consumer behavior regarding water conservation and usage is going to be an important component of this. Part of this should include tiered pricing for water. Action on this is needed at all levels, else the scenario playing out in Mendocino will no longer be the exception but the rule.

Thank you for the opportunity to provide my feedback  
With regards,



Suman Singha, PhD  
Professor Emeritus (Univ. of Connecticut)