



CALIFORNIA DEPARTMENT OF WATER RESOURCES

SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

901 P Street, Room 313-B | Sacramento, CA 95814 | P.O. Box 942836 | Sacramento, CA 94236-0001

July 17, 2019

Mr. Derrell K. Eck
Executive Director
Sacramento Central Groundwater Authority
827 7th St., Rm 301
Sacramento, CA 95814

RE: South American Subbasin Alternative

Dear Mr. Eck:

The Department of Water Resources (DWR) evaluates and assesses alternatives submitted by local agencies to satisfy the objectives of the Sustainable Groundwater Management Act (SGMA) in lieu of groundwater sustainability plans as provided for by Water Code Section 10733.6. On December 30, 2016, the Sacramento Central Groundwater Authority (Authority) submitted an alternative (South American Alternative) based on an analysis of basin conditions purporting to demonstrate that the South American Subbasin had operated within its sustainable yield over a period of at least 10 years as authorized by Water Code Section 10733.6(b)(3). Department staff reviewed the South American Alternative and has prepared the attached Sustainable Groundwater Management Program Alternative Assessment Staff Report, South American Subbasin (Staff Report).

The recommendation of the Staff Report is that the Department not approve the South American Alternative. Multiple factors contribute to the staff recommendation, but those addressed in this letter are central to the outcome. The Staff Report did not consider and does not conclude that the South American Subbasin is, or has been, managed unsustainably. Rather, as described in the Staff Report, Department staff were unable to determine that the identified sustainable yield for the South American Subbasin is intended to avoid undesirable results for all applicable sustainability indicators, specifically depletions of interconnected surface waters. Without understanding how the sustainable yield is sufficient to avoid undesirable results related to depletions of interconnected surface waters, staff were unable to determine that the South American Subbasin did not experience undesirable results over a period of at least 10 years.

In addition, it is uncertain whether the management actions, i.e., the Basin Management Objectives (BMOs) included in the 2006 Central Sacramento County Groundwater Management Plan prepared for the locally-defined Central Basin, were utilized to define or avoid undesirable results in the South American Subbasin. For example, BMO 2 sets forth a monitoring methodology to meet specific objectives in managing groundwater levels. The South American Alternative provides information that indicates certain polygons in the South American Subbasin groundwater model

have experienced 100 percent encroachment of the lower groundwater level assigned to that well/area. That encroachment was deemed acceptable, but no scientific grounds were provided for that conclusion. Department staff were thus unable to determine what constitutes an acceptable or unacceptable lowering of groundwater elevation.

If the Authority believes that such information exists and was presented to the Department in the original submission, the Authority may respond within 30 days of this notice, identifying where the relevant information can be found in its documents. The deadline for alternative submissions having passed, no new information or analyses will be considered, although the Department will accept documents clearly referenced in, but not submitted with, the original materials if those documents contain the missing information and were identified as such in the South American Alternative. The Authority should provide evidence of the following:

1. That the negotiated sustainable yield for the South American Subbasin was developed, in part, to avoid depletions to surface waters that have significant and unreasonable adverse impacts on beneficial uses of the surface waters.
2. That operating to the sustainable yield will avoid depletions to surface waters that have significant and unreasonable adverse impacts on beneficial uses of the surface waters.
3. How the trigger points for BMO 4 are able to avoid depletions to surface waters that have significant and unreasonable adverse impacts.
4. Whether the Authority monitored the losses of river water to groundwater during the 10-year period analyzed in the Alternative.
5. That the Authority has defined, based on scientifically-reasonable grounds, what constitutes an unacceptable groundwater level in the model's polygons, especially those that have experienced 100 percent encroachment.
6. That pumping estimates used to show operation within the sustainable yield are representative of actual conditions occurring in the South American Subbasin during each provided year, and the estimates include all significant sources of pumping occurring throughout the South American Subbasin.

The Department will review any information provided by the Authority and make a final decision within 90 days of this notice. All communications from the Authority related to this notice should be directed to Craig Altare, GSP Review Section Chief, at Craig.Altare@water.ca.gov and mailed to:

California Department of Water Resources
Attention: Sustainable Groundwater Management Office
P.O. Box 942836
Sacramento, CA 94236-0001

If the County is unable to provide the information identified above or chooses not to do so, the recommendation of the Staff Report shall become the decision of the

Department and will be reflected in a final Statement of Findings. High- and medium-priority basins for which an alternative has been not approved remain subject to SGMA requirements and the corresponding statutory deadlines for GSA formation and GSP development. Information on the Department's technical, planning and financial assistance may be found on the DWR website at

<https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>.

Signed:

Date:



July 17, 2019

Taryn Ravazzini
Deputy Director, Statewide Groundwater Management

Attachment:
Sustainable Groundwater Management Program Alternative Assessment Staff Report,
South American Subbasin