



ECOS
ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO



Environmental Council of Sacramento
P.O. Box 1526, Sacramento, California 95812
Phone: 916-444-0022

October 26, 2021

To: GSAs associated with the development of GSPs for the North and South American subbasins and the Cosumnes Subbasin

North American Subbasin

Reclamation District 1001 GSA; Michael Phillips, mphillips@rd1001.org
Sacramento Groundwater Authority GSA; Rob Swartz, rswartz@rwah2o.org
South Sutter Water District GSA; Brad Arnold, sswd@hughes.net
Sutter County GSA; Guadalupe Rivera, grivera@co.sutter.ca.us
West Placer County GSA; Christina Hanson, chanson@placer.ca.gov

South American Subbasin

Sacramento County; Linda Dorn, dornl@saccounty.net
Northern Delta; Erik Ringelberg, erik@thefreshwatertrust.org
Omochumne-Hartnell Water District, Mike Wackman, info@ohwd.org
Sacramento Central Groundwtr Auth; John Woodling, jwoodling@geiconsultants.com
Sloughhouse Resource Conservation Dist; Austin Miller, austin@sloughhouseRCD.org

Cosumnes Subbasin

Omochumne-Hartnell Water District; Mike Wackman, info@ohwd.org
Sloughhouse Resource Conservation Dist; austin@sloughhouseRCD.org
Galt Irrigation District; Leo Van Warmerdam, galtirrigationdistrict@gmail.com
Clay Water District; Gary Silva Jr., soilstoppers@yahoo.com
City of Galt; Mark Clarkson, mclarkson@cityofgalt.org
Amador County Groundwater Mgmt Auth; Rick Ferriera, rferriera@amadorwater.org
Sacramento County; Linda Dorn, dornl@saccounty.net

Subject: Comments on CoSANA model report to be included as part of the Groundwater Sustainability Plan

Board Chairs,

ECOS/Habitat 2020 submit the following CoSANA comments for your consideration. These comments deal with the Recommendation Section, page 6-1 through 6-3 of the CoSANA model report proposed for inclusion in your Groundwater Sustainability Plans (Plans). Given the length of the report and the short time for review, we have not conducted a technical assessment of the model, but have instead limited our review to the Recommendations Section of the document. We focus our comments on what further work is needed to keep the CoSANA model updated for use in annual Plan reporting, five-year Plan updates, and to improve the model's shortcomings.



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First, we believe that each Plan should include a Management Action to form a technical working group (or similar mechanism) comprised of representatives of each of the region’s three subbasins. The group should be charged with carrying out the work required to improve the model and to keep the model updated so that it can be used as needed for annual Plan reporting and five-year Plan updates. The work of the group should be open to public review so that diverse scientific viewpoints can be heard.

Second, we believe that each Plan’s Management Action section should identify the specific steps to carry out the model improvements called for in the CoSANA model report. The Plans should provide the funding and other resources needed to accomplish the model updates and improvements in time for the next Plan update in 2025.

Third, we believe priority should be given to address the specific areas of model deficiency or short comings that are important to subbasin management including the protection of Groundwater Dependent Ecosystems and groundwater surface water interactions.

Fourth, we believe that more focus should be placed on integration of climate change predictive modeling and the CoSANA model so that improved climate change modeling scenarios can be run in subsequent years.

Finally, we believe that additional emphasis should be placed on more recent climate conditions and their extrapolation into the future rather than depending on older sets of climate and hydrologic data. Older data sets are not as reflective of the changes in climate currently experienced and projected to occur. This includes increased likelihood of shorter rainy seasons, stronger atmospheric rivers, and warmer temperatures leading to lower peak snowpack. As part of this analysis, consideration should also be given to the changes in absorption that warmer soil will have upon snowpack and rainfall runoff.

We appreciate and commend you for all of the work and resources that have gone into the development of the CoSANA model and the fact that all three subbasin GSAs have participated in its development and use. We strongly urge this type of regional coordination and hope that it will extend to other GSP areas.

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The Environmental Council of Sacramento (ECOS) is a 501c3 nonprofit, with the mission to achieve regional and community sustainability and a healthy environment for existing and future residents. Member organizations of ECOS include: 350 Sacramento, Breathe California Sacramento Region, Environmental Democrats of Sacramento, *Friends of Stone Lakes NWR*, *International Dark-Sky Association*, Physicians for Social Responsibility Sacramento Chapter, *Sacramento Audubon Society*, Sacramento Citizens' Climate Lobby, Sacramento Electric Vehicle Association, Sacramento Housing Alliance, Sacramento Natural Foods Coop, *Sacramento Valley*



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Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes, Save the American River Association and Sierra Club Sacramento Group.

Habitat 2020 is a coalition that works to protect the lands, waters, wildlife and native plants in the Sacramento region. Member organizations of Habitat 2020 include: the ECOS member groups italicized above, as well as the Friends of Swainson's Hawk, Sacramento Area Creeks Council and Sacramento Heron and Egret Rescue. Habitat 2020 also serves as ECOS' Habitat and Conservation committee.

Signatures

Ralph Propper

Ralph Propper
President, ECOS

Sean Wirth
Co-Chair, Habitat 2020

Robert Burness
Co-Chair, Habitat 2020

cc: Jessica Law, Executive Director, Water Forum, jlaw@waterforum.org
Jim Peifer, Executive Director, Regional Water Authority, jpeifer@rwah2o.org