

**EASTERN MANAGEMENT AREA
CITIZEN ADVISORY GROUP
MEMORANDUM**

DATE: July 7, 2021

TO: EMA GSA Committee

FROM: EMA Citizen Advisory Group
Prepared by Gay Infanti

SUBJECT: Draft Sustainable Management Criteria for the EMA

Eastern Management Area (EMA) Citizens Advisory Group (CAG) Members

Gay Infanti, Sam Cohen, Mary Heyden, Elizabeth Farnum, Tim Gorham, Kevin Merrill

Introduction

The EMA CAG held a meeting on July 7, 2021 via teleconference to review the Draft Sustainable Management Criteria (SMC) Section for the EMA prepared by the consultant GSI.

Below is a summary of the CAG's comments.

CAG Comments on the Draft SMCs for the EMA:

Some CAG members expressed a sense of urgency regarding the current drought and believe that the EMA needs to take immediate action to prevent additional deficits in groundwater storage resulting in the possibility that shallower domestic, mutual, and municipal wells, serving human populations, could quickly reach minimum thresholds, lose production capacity, or dry up due to current levels of pumping during ongoing lack of rain and increasing temperatures.

A concern was also expressed that the GSP seems to assume the basin will return to historically frequent wet periods and relies too much on historical data. We can't afford to be wrong. In addition, the GSP doesn't adequately address the hotter temperatures more recently experienced.

The GSI consultant responded that these are valid concerns but SGMA does not necessarily require action to be taken in response to current drought. However, he said the GSA could use more aggressive projections and it would not be unreasonable to do something now, e.g., if we continue to experience below average rainfall, if the GSA members elect to do so.

Another CAG member asked if the County is doing anything to encourage water conservation. A staff member responded concerning the County Water Agency's Regional Water Efficiency

Program's initiatives, which address conservation. The CAG member also asked if there are enough monitoring wells because there are still areas in the basin lacking them. The GSI consultant replied that more wells are needed, and it was hoped that more well owners would come forward voluntarily to share their well data for monitoring purposes. If not, funding may be needed to drill additional monitoring wells. This issue will need to be addressed in the management plans and projects section to be available soon, along with the water conservation issues this CAG member raised.

Some CAG members wanted to reserve the opportunity to revisit the MTs and SMCs once the draft management actions are available.

Several CAG members held off making their comments, wishing to wait until the draft management actions are available. There is concern about the cost of management actions.

Another CAG member, who also expressed concern about the cost of management actions, felt that actions/projects should be undertaken only when there are current significant and unreasonable results occurring.

It was mentioned by several CAG members that the Draft SMC section of the document was repetitive and confusing to read. The consultant explained that the document follows a DWR formula to ensure all requirements are addressed in the GSP and to facilitate DWR's subsequent review of the GSP once it is submitted.

Comments were made concerning water quality standards, found in Table 5.2, which the GSI consultant explained were the responsibility of Federal and State agencies. The GSA's responsibility is to ensure that water quality is not worsened by groundwater pumping or any actions it takes or fails to take to sustainably manage the basin.

A concern was expressed by one CAG member that Ag/Ranching interests were not being heard and that GSA efforts could be driven by the municipal and mutual water agencies. The member urged the GSA to move slowly, i.e., not to get too restrictive too quickly and said that all stakeholders would have to do their fair share.

One CAG member asked several questions concerning the planning horizon, how long before a significant and undesirable result occurs must action be taken, and how often the GSP is monitored? The GSI consultant explained that the GSA is required to do annual reporting to DWR, and that every 5 years the GSP will be updated. This member also asked if there is another source of definitions or terms used in this draft section. The consultant responded that they are trying to capture terms for a glossary of acronyms that will be used in the final GSP document.

There was some discussion about the GDEs and whether they were adequately covered in the GSP, as well as the mechanism for monitoring groundwater levels relative to identified GDEs.

The representative from CDFW commented that he was happy to hear CAG comments and discussion about the GDEs, asked about the EMA's monitoring network for progress related to

SMCs, and asked about when MTs and SMCs can be readdressed. The GSI consultant responded that the GSP can be updated regarding future planning, if there's a good reason, whenever the GSA decides. Bill Buelow added that the draft chapter of the monitoring network section will be available for comment soon.