

DRAFT COMMENT TO EASTERN SAN JOAQUIN GROUNDWATER AUTHORITY ON FINAL GSP

The following comments are provided by the Sacramento County Groundwater Sustainability Agency (GSA) on behalf of the seven GSAs in the Cosumnes Subbasin, the northern neighboring subbasin to the Eastern San Joaquin (ESJ) Subbasin. The Cosumnes Subbasin, as a medium priority basin, provided comments on the Eastern San Joaquin Groundwater Authority (ESJGWA) draft Groundwater Sustainability Plan (GSP). In reviewing the final ESJGWA GSP have found that our comments appear to have been given due consideration and most responses seemed thoughtful.

However, one area we request additional emphasis on in the future is ESJGWA's coordination with neighboring subbasins. We encourage the ESJGWA to continue coordinating with the Cosumnes Subbasin especially on surface/groundwater interfaces along our Dry Creek shared boundary. This area has been identified as a data gap, which both subbasins need to address.

A second area of focus with respect to coordination is the water budget wherein the ESJGWA appears to rely on groundwater flow from adjacent subbasins to balance the ESJ Subbasin's budget. The Cosumnes GSA's will be confirming cross-boundary flow rates between the subbasins through modeling and believes that both subbasins will need to implement projects/management actions to understand and manage this interbasin movement of groundwater.

A third area for on-going coordination relates to the inconsistent methodology to determine the minimum thresholds for groundwater levels in two wells along Dry Creek. Well 04N05E24J004 used historical data starting in the mid-1990s while well 04N07E20H003 used historical data starting in the mid-1980s. Establishing minimum thresholds using a historical period starting in the mid 80's could allow more flow into the Eastern San Joaquin Subbasin from the Cosumnes Subbasin. Using a consistent methodology between these wells would be our preference and the data could be updated either in future annual reports or the five year update of the ESJGWA GSP.

We look forward to working with the ESJGWA to fill data gaps, confirm model outputs on inflow/outflow, share data that would be helpful for annual report preparations and 5-year updates of both subbasins GSPs.

Comments due May 15, 2020, submitted at:

<https://sgma.water.ca.gov/portal/gsp/all> search for Eastern San Joaquin