

EKI TECHNICAL PRESENTATION #33

COSUMNES SUBBASIN GSP DEVELOPMENT

20 OCTOBER 2021

COSUMNES SUBBASIN WORKING GROUP MEETING

AGENDA ITEM #2

GSP TECHNICAL WORK PROGRESS AND PLANNING

- Prop 68 Update
- GSP Update – 2021 look ahead – and 3-month look ahead
- Annual Report needs and timeline

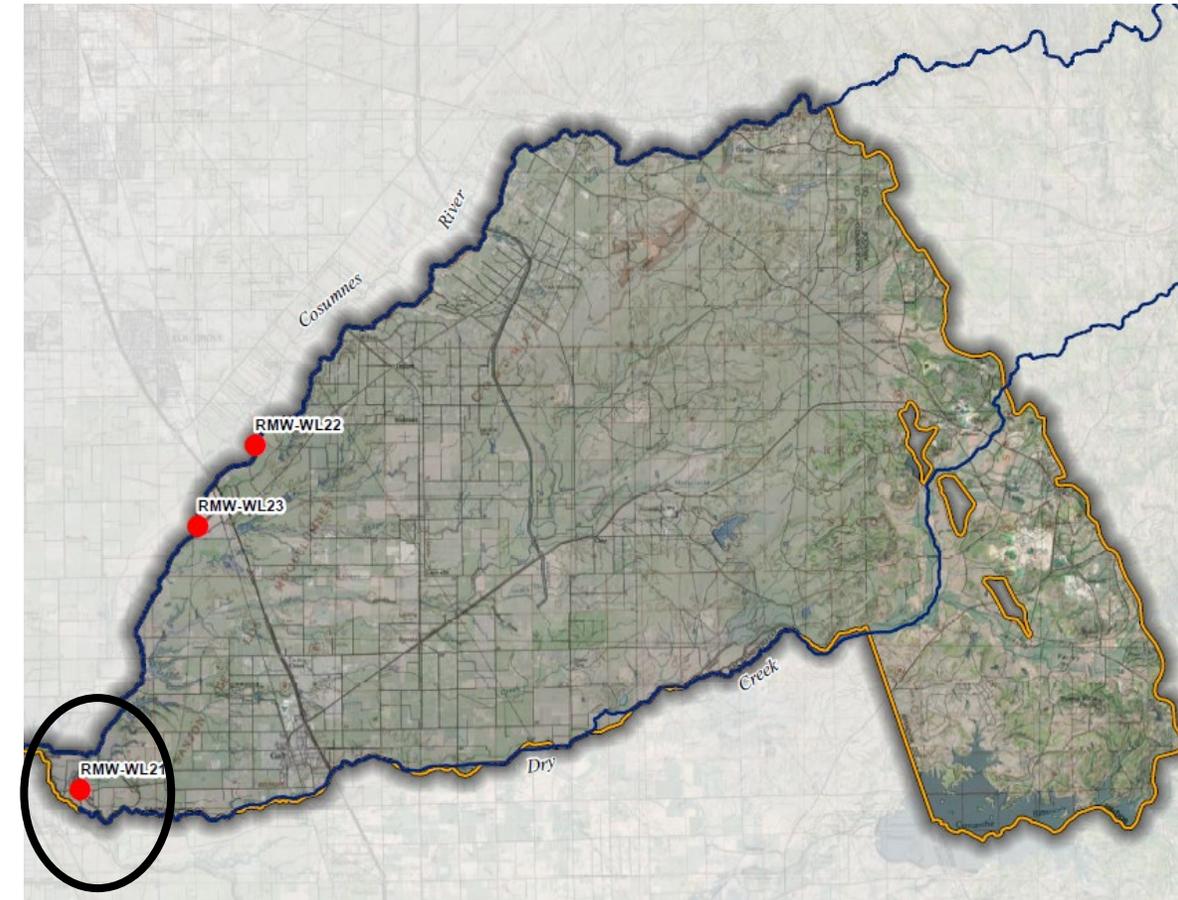
PROP 68 UPDATES

Monitoring Well Installation

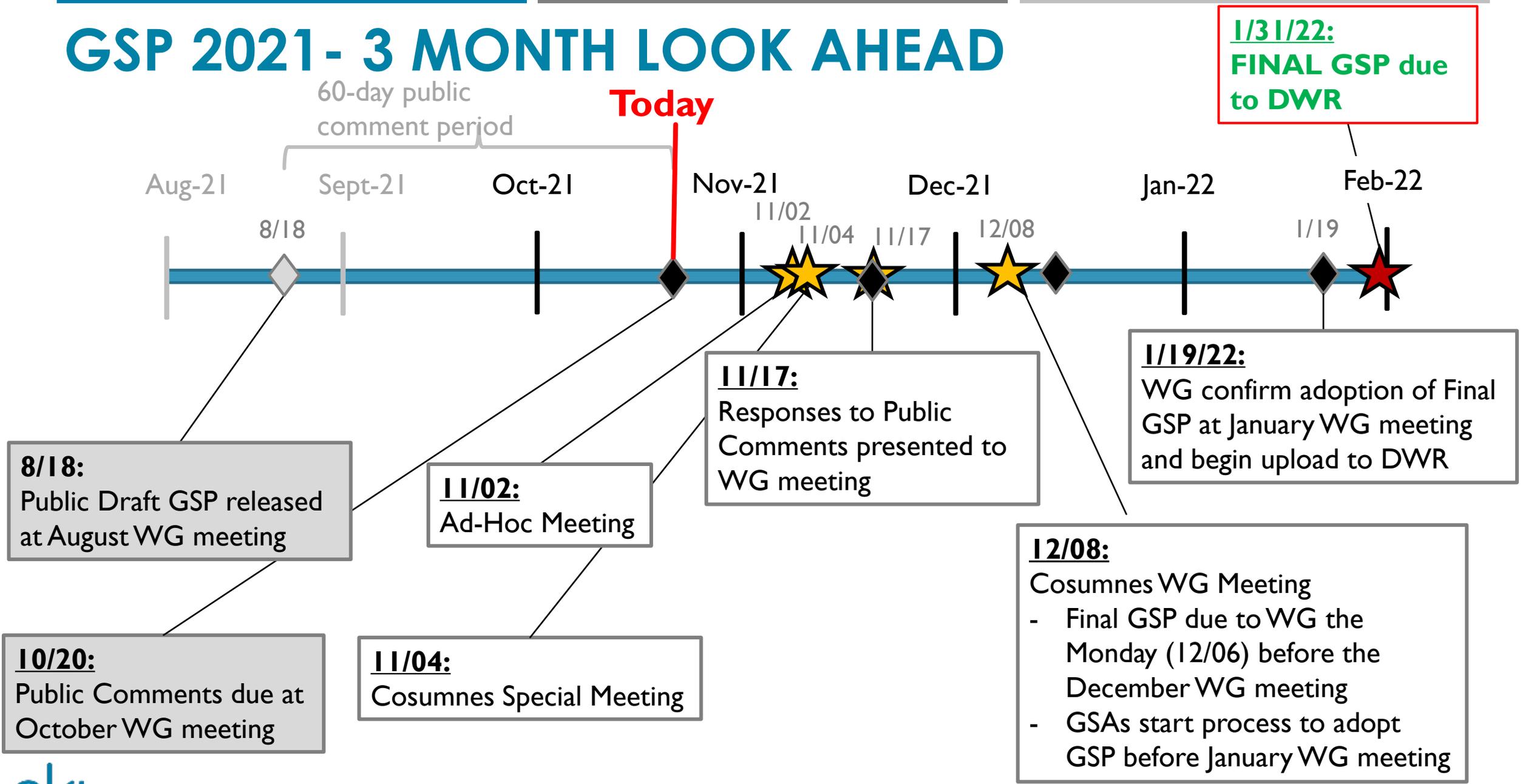
- Revised well location and construction: a shallow, mid-depth and deeper well will be drilled at site RMW-WL21.
- Encroachment permit for final site expected to be finalized late-October.
- Bid sent out to 6 drillers.
- As of today, the earliest drilling date is Nov 15.

Meters

- 10/1: EKI visited meters to inspect functionality and collect readings
 - One meter was not recording properly; contractor corrected the problem.
- Need to collect readings from remaining cooperating landowner meters (Wohle and Van Warmerdam).



GSP 2021- 3 MONTH LOOK AHEAD



PUBLIC COMMENTS (1 OF 7)

General types of responses in order of frequency

- Explain how GSP meets regulatory requirements. (~35%)
- Point to relevant text already in the document. (~30%)
- Refine and clarify key portions of the text. (~15%)
- As appropriate,
 - Identify additional evaluations to include as part of 5-year update. (~15%)
 - Provide additional information in GSP with minimal to no new evaluation. (~5%)

PUBLIC COMMENTS (2 OF 7)

Tribes and Disadvantaged Communities

Commentors: ECOS, TNC, Audubon, LGC, Union of Concerned Scientists, Action Fund

- Requests to break down water budget to include Tribal and DAC groundwater use.
- Identify proportion of groundwater use by Tribes and DACs.
- Design monitoring plan to specifically track conditions relevant to Tribal and DAC groundwater use.
- Request for well mitigation program (both for Tribes/DACs and in general).

- *Clarify limited domestic use by Tribes and DACs.*
- *Point to SGMA regulatory requirements for required level of detail:*
 - *Water budget requires documentation of outflows from groundwater system by water use sector [§ 354.18. Water Budget (b) (3)]*
 - *“Water use sector” – categories of water demand based on the general land uses to which the water is applied, including urban, industrial, agricultural, managed wetlands, managed recharge, and native vegetation. [§ 351. Definitions (a)]*
- *Add specific recommendations in the data gaps section as appropriate.*

PUBLIC COMMENTS (3 OF 7)

GDEs and Principal Aquifer Definitions

Commentors: TNC, Audubon, LGC, Union of Concerned Scientists, Action Fund, CDWF

- GSP needs to consider “perched aquifer” a principal aquifer.
- Perched conditions should not be used to exclude potential GDEs.
- GDEs are primary beneficial users of perched groundwater.
- Report groundwater use by GDEs.

- *SGMA defines “Principal aquifers” as aquifers or aquifer systems that store, transmit, and yield significant or economic quantities of groundwater to wells, springs, or surface water systems. (§ 35 I. Definitions [aa])*
- *Clarify that groundwater use by Native Vegetation includes GDEs and is a component of the water budget reported in the GSP.*

PUBLIC COMMENTS (4 OF 7)

Climate Change

Commentors: ECOS, TNC, Audubon, LGC, Union of Concerned Scientists, Action Fund, CDFW

- More comprehensive and prominent treatment of Climate Change
 - More definitive plan that responds to climate change (e.g., triggers that would implement other PMAs).
 - Impacts on surface water supply (imported water and floodwater).
 - Impacts on available floodwater for projects.
 - More clarity on climate change analysis.

- *§ 354.18. Water Budget (c)(3)(a) Projected hydrology shall utilize 50 years of historical precipitation, evapotranspiration, and streamflow information as the baseline condition for estimating future hydrology. The projected hydrology information shall also be applied as the baseline condition used to evaluate future scenarios of hydrologic uncertainty associated with projections of climate change and sea level rise.*
- *City of Lone and Rancho Seco (SMUD) only importer of surface water (<2% of surface water flows).*
- *Point readers to documentation on climate change scenarios.*
- *Input from Working PMA Committee and Ad-Hoc.*

PUBLIC COMMENTS (5 OF 7)

Interconnected Surface Water SMCs

Commentors: CDFW, NMFS, TNC, Audubon, LGC, Union of Concerned Scientists, Action Fund, ECOS

- Biological
 - GDE trigger thresholds – how are they activated and what response is initiated.
 - Advocate for deeper root depth cut-off (80 ft depth) to identify GDEs rather than previous TNC recommended 30 ft depth to water.
 - Requests for more focus on relationship between SMCs, surface water flows and URs salmon and steelhead.
- Recommendations to consider URs that occurred prior to January 1, 2015 and develop SMCs for GWL and ISW accordingly.
- *Point to GSP sections that explain “GDE” triggers apply only to ISW- and assumed-GDE MW’s that do not show long-term trends.*
- *Point to conservative assumptions identifying GDEs, benefit of future monitoring data, and need to reevaluate as more definitive guidance becomes available.*
- *Point to GSP sections that explain surface water depletions are a data gap, and detailed data needs described as part of future monitoring efforts.*
- *Per SGMA, maintenance of groundwater at 2015 levels would not constitute undesirable results and SGMA limits the scope of GSAs’ legal responsibilities to addressing post-2014 impacts. (CWC) §10727.2(b)(4)*

PUBLIC COMMENTS (6 OF 7)

PMAs and Implementation

Commentor: CDFW, NMFS, TNC, Audubon, LGC, Union of Concerned Scientists, Action Fund, ECOS

■ Projects

- Question feasibility of PMAs.
- Recommend multi-benefit projects including Flood Plain Projects.

“Coordinate with Agency and NGO partners working with willing landowners near the Cosumnes River to develop projects that offer recharge and agricultural and/or habitat preservation benefits.”

- Confirm surface water plans by other Sacramento area subbasins have not double-counted available water.
- Document water rights for flood waters.

■ Implementation

- Contingency plans.
- More definitive measures and schedules to address data gaps.
- More definitive plans and schedules for stakeholder engagement (particularly DAC and environmental).

■ *Input from Working Group Committees and Ad-Hoc.*

PUBLIC COMMENTS (7 OF 7)

Miscellaneous

Commentor: Misc. Agencies and Private Parties.

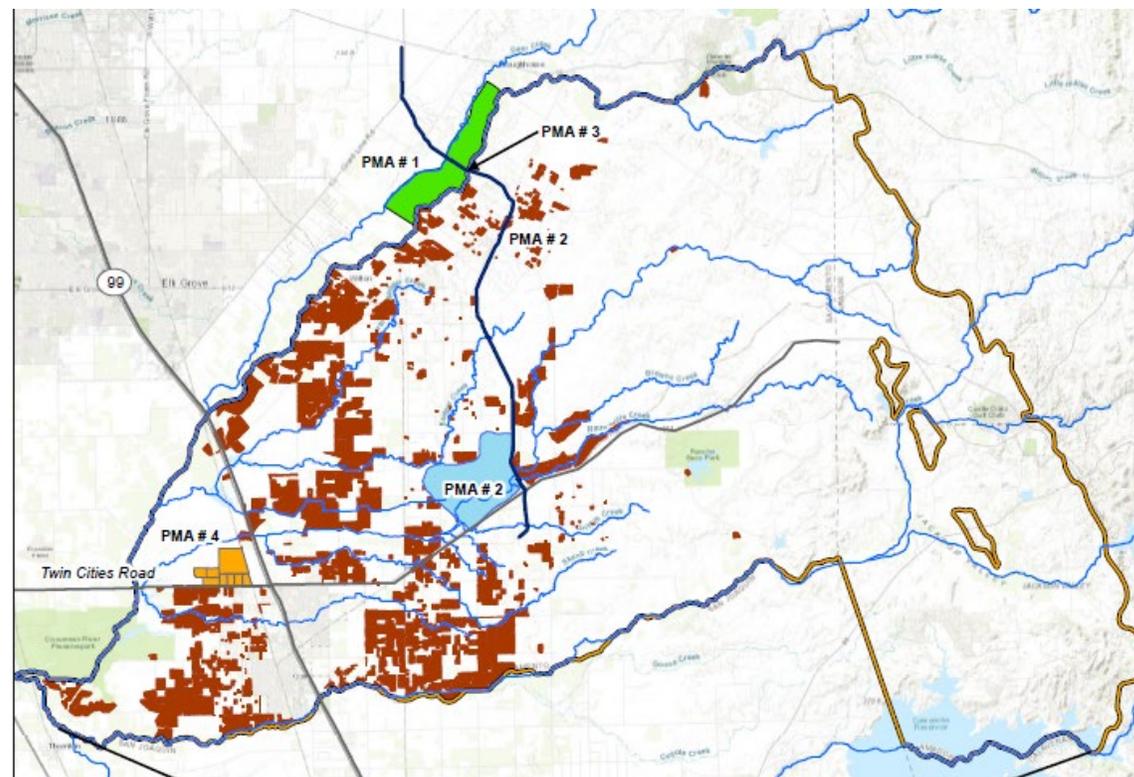
- Request to include Manganese as a constituent of concern.
- Concerns about fees and funding sources.
- Inappropriate to sell water from the basin when storage is declining.
- More information on Rancho Seco
 - Describe reliability of water supply source and water use at SMUD.
- More information on water conservation programs in Basin.
- Concerns with using the 2 consecutive non-drought year qualifier for URs.
- Request for consistency (the same) approach between North American, South American and Cosumnes subbasins.

PROJECTS AND MANAGEMENT ACTIONS (1 OF 3)

Projected groundwater level changes

Visualization of CoSANA output

- EKI tool developed independent of Cosumnes GSP (not part of project scope).
- Applied to 50-year Projected Condition Baseline (PCBL) without and with PMAs.
- Tool created maps that show differences between model-calculated October water levels
 - PCBL with PMAs minus PCBL without PMAs.
 - Positive differences indicate water level increase as a result of PMAs.



THE END