



Austin Miller <austin@sloughousercd.org>

Re: Upcoming Meeting - August 21st, 2023

Pedro Aratanha <paratanha@gmail.com>

Fri, Aug 18, 2023 at 11:00 AM

To: Cosumnes Groundwater Authority <info@cosumnesgroundwater.org>, Austin Miller <austin@sloughousercd.org>, Barbara Washburn <bwashburn@sloughousercd.org>, gthomas@amadorwater.org, jvandenburg@cityofgalt.org, GaltIrrigationDistrict@gmail.com, "Hunley. Chris" <hunleyc@saccounty.gov>, herbgarms@sloughousercd.org, Jay Schneider <cowboyjay@gmail.com>, lindsey.r.liebig@gmail.com, soilstoppers@yahoo.com, garmsfarms@gmail.com

Hi, Austin,

Regarding the fee study "discussion" in your August 21 Meeting Agenda: if I understand the slides correctly, it seems that you/consultants are proposing that growers be charged by irrigated acreage, not per acre-foot. This is misguided, as I explained to you and CGA/SRCD boards several times before.

Growers should be charged per acre-foot.

First, arguing that "parcel-level data on groundwater pumping are difficult to obtain and therefore we cannot charge per acre-foot" is flawed, if not disingenuous. Despite the challenges around parcel-level water use data (for example, as mentioned in your slides, separating surface water from groundwater), it is possible to design a fee based on acre-foot, and in fact, many other basins have actually implemented, or are in the process of implementing, this approach. Why can't we? I would like you to provide a written answer for that question.

Moreover, the fee structure described in your slides is clearly unfair. In your slides I read residential use fee of \$7.28/parcel; PWS fee of \$7.28/ac-ft., and irrigate acreage fee of \$11.25/irrigate acre. If residential use was assumed to be between 1 and 2 ac-ft. per parcel, then households would be paying from \$3.64/ac-ft. to \$7.28/ac-ft. If vineyards were assumed to use 2 ac-ft./irrigated acre, pasturelands 4 ac-ft./irrigated acre, and other crop types 3 ac-ft./irrigated acre, then growers would be paying from \$2.81/ac-ft. to \$5.63/ac-ft. Please correct me if I'm misunderstanding your slides. But if I'm not, this looks very much unfair to me. Why should households pay more for a gallon of water than growers? And why should growers that use water more efficiently pay more than growers who waste water?

Finally, I feel that my previous comments on this matter have not been heard or taken into account by the CGA/GSA boards. This is not first time I am submitting comments about the Cosumnes basin fee studies and proposals, in particular in regards to the importance of incorporating per acre-foot use charges in the fee structure. I hope I am not ignored again. Shamefully, and contrary to statewide trends, per acre-foot use charges have never been seriously considered by CGA/GSA boards. And I would like you to explain why.

I am looking forward to receiving written answers to the questions above.

Thank you,
Pedro

On Thu, Aug 17, 2023 at 5:00 PM Cosumnes Groundwater Authority <info@cosumnesgroundwater.org> wrote:

**GALT IRRIGATION DISTRICT
P.O. BOX 187
HERALD, CA 95638
209-734-6077**

July 11, 2023

Dear Cosumnes Groundwater Authority,

As a GSA and stakeholder in the Cosumnes Groundwater Authority (CGA), Galt Irrigation District would like to address an ongoing topic within the Cosumnes Basin that we feel needs to be discussed and promoted within CGA. The Cosumnes Basin is being held responsible for groundwater sustainability and yet new developments and wells are being approved which add new straws to the aquifer without being charged for any new groundwater extractions. Galt Irrigation District feels strongly that there needs to be a path taken by CGA for a solution to this problem.

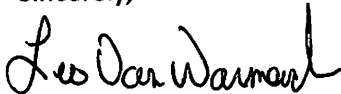
Currently in the Cosumnes Basin, only irrigated agricultural land is being assessed for funds needed to conform to SGMA guidelines. Galt Irrigation District feels that any new well that is established needs to be assessed a new extraction fee. These new extractions may be for new developments, municipalities or ag wells within the Basin. An example that Galt Irrigation District is currently analyzing is a new development outside of the City of Galt sphere of influence that is asking for 17 new groundwater wells. The question becomes how can we, as a GSA in a medium priority basin, allow these new wells to be developed without any extra charges for the new extraction points.

Grant funds provided by the State will probably get harder for basins to obtain with ongoing concerns about budget deficits that the State is currently suffering. Thus if the basin doesn't start developing a plan that charges fees for new extractions and use those fees for basin investment, we will get less and less accomplished going forward when it comes to solving our overdraft issues.

It is our strong feeling that the CGA Stakeholders need consistency in our decisions to allow new groundwater extractions and assess a charge for any new extraction points. As stated earlier, it is not fair to simply assess a fee to existing irrigated land parcels and not expect any new extractions to contribute to the SGMA efforts. Funds generated from any new wells could be set aside for surface water management such as pursuing surface water and recharge projects within the Basin.

Please take the time as the governing agency to discuss this topic in depth with the Stakeholders. It would be prudent to have a unified Basin-wide policy about any new extractions that is both fair and equitable to everyone involved. Thank you for this consideration.

Sincerely,



Leo VanWarmerdam
Chairman, Galt Irrigation District



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Post Office Box 1526 | Sacramento, CA 95812-1526

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August 17, 2023

Subject: Letter of Thanks and Suggestions for Well Permitting Coordination

On behalf of the membership of the Environmental Council of Sacramento and the Water Committee, I would like to thank each you and Trevor Joseph for the thoughtful and informative briefings you provided on the status of the region's three groundwater subbasins. All of us, and the many guests who attended the meetings or have viewed the videos have found the presentations and subsequent discussions of significant value in understanding the regional efforts to maintain and/or attain sustainable groundwater resources for all beneficial users.

As you could tell from our questions and the discussions following your presentations, we continue to be interested in Groundwater Sustainability Agency (GSA) efforts to sustain and improve conditions for Groundwater Dependent Ecosystems (GDE), coordination among all the region's GSAs regarding plan implementation and subbasin modeling/monitoring, and GSA efforts to implement each subbasin's Groundwater sustainability Plan. We congratulate the North American and South American Subbasins on their recent Groundwater Sustainability Plan (GSP) approval and hope the Cosumnes GSAs will soon see approval of their plan as well.

One of the areas all three GSPs call for is additional work in cataloguing and protecting shallow and domestic wells and in the permitting of new wells. Each plan singled out this area for further analysis and collaborative work with the County and those who have wells of this type. We also understand that a recent Governor's Executive Order places additional responsibility on GSAs and the County in well permitting – namely making a finding that any new wells subject to County permitting are consistent with the GSP. We understand that making this finding can also have impacts on future land use development and create a situation that may not have been envisioned when the GSAs were formed and the GSPs developed.



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GSAs have specific technical data about each subbasin including specific monitoring and modeling information and where critical GDEs are located. This and other information developed and managed by the GSAs should be of value in helping the County make appropriate permitting decisions. GSAs may be able to contribute specific new well location criteria and permitting specifications that take advantage of this information. These well permitting requirements can assist the County's efforts to ensure new permitted wells do not damage the effectiveness of existing wells, negatively impact GDEs, damage groundwater modeling/monitoring systems, and/or adversely impact subbasin sustainability.

We understand that John Woodling has contacted the County and suggested a meeting to discuss GSA interactions with the County's groundwater well permitting program. We also understand that the County is interested in working more closely with the region's GSAs on this and other regional groundwater issues. ECOS continues to have an interest in this area and may have insights and experience that are of value to both the GSAs and the County. When appropriate, we would like to join with you and the County to reach a consensus on how this new responsibility will be carried out consistently across the region.

Best Regards,

Theador N. Rauh
Chair, ECOS Water Committee

Cc: Kerry Schmitz
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