



10.12.2022

Eastern San Joaquin Groundwater Authority and Groundwater Sustainability Agencies
P. O. Box 1810
Stockton, CA 95201
via email: ESJgroundwater@sjgov.org

Re: Response to Agenda Materials for the Eastern San Joaquin Groundwater Authority Board of Directors and Steering Committee, October 12.2022 and Referenced Eastern San Joaquin Groundwater Authority Steering Committee Meeting Minutes, 8.10.2022

We have reviewed the 10.12.2022 Steering Committee Agenda Packet¹ which included the minutes of the 8.10.2022 Steering Committee and are concerned about the omissions in the meeting record related to staff and public comments. On multiple occasions we have requested that a permanent and complete record of Groundwater Authority meetings be made available to the public in the form of audio and/or video recordings. The Steering Committee 8.10.2022 minutes provide an example of why such a record is important for governmental transparency and trust building. Two glaring errors include public comments regarding item II A. 1. Meeting Minutes. and II A. 2. Revised GSP Submittal to DWR and GSP Adoption.

Eastern San Joaquin Groundwater Authority Steering Committee 8.10.2022 Meeting Minutes

The Meeting Minutes item II A.1. were of the July 2022 Steering Committee meeting during which I made comments on Director comments regarding well permitting notification that was referenced in Delta-Sierra Group 8.10.2022 correspondence sent to the Eastern Groundwater Authority by email and posted on the Department of Water Resources SGMA Portal. No mention of these comments was included in the 8.10.2022 Steering Committee minutes. This meeting omission was documented in Delta-Sierra Group correspondence dated 8.10.2022. Any presentation used during meetings should also be included in meeting minutes and/or posted on the Eastern San Joaquin Groundwater Authority website.

The Revised GSP Submittal to DWR and GSP Adoption item II A.2. included comments of a proposed public meeting to present the revised GSP that was submitted to Department of Water Resources in July 2022. I provided comment on this item to request that the public meeting be held in the evening and that while GSA were not to be required to attend that they be responsible for public notification of the meeting to all stakeholders within their jurisdictional boundaries. There was no mention of these comments in the 8.10.2022 Steering Committee Minutes. Additionally, further discussion included a director signifying a public request to staff following my comments and an acknowledgement that comments will not affect the final revised GSP and that staff would be directing the public to submit comments on the SGMA Portal.

Eastern San Joaquin Groundwater Authority Steering Committee and Board of Directors 10.12.2022 Agenda Items

The Water Accounting Framework scope of work does not include public participation considerations but merely interactions between GSAs. This is a process that will ultimately require public stakeholder

¹ http://www.esjgroundwater.org/Portals/0/10_12_22%20Steering%20Agenda%20Package%20final.pdf

commitments in property/use fees to correct cost allocations. When the Stakeholder Workgroup was meeting, water accounting was a topic of keen interest amongst the various interest groups represented. The revised GSP submitted to DWR included the Eastern San Joaquin Groundwater Authority Stakeholder Engagement and Public Outreach Plan which should be used as an implementation blueprint instead of being words that promise the public opportunities which are not available.

Project Submitted Projects Found to be Consistent with the GSP

The project list included quantifiable benefits in terms of water volumes but did not include cost estimates for the implementation of the project or time frames for implementation. Fact sheets should be developed for each project included in the GSP to better inform stakeholders. All projects incorporated into the GSP and supported by the Groundwater Authority should include public outreach and engagement.

Eastern San Joaquin Water Resources Model Policy


The Model Policy did not include any reference to stakeholder engagement, yet staff had indicated in the 8.10.2022 Steering Committee meeting that the TAC had noted the need to inform the public about the model inferring some type of outreach was planned. This referenced comment was omitted from the 8.10.2022 Steering Committee meeting minutes.

Items not on the Agenda of Either Steering Committee or Board of Directors of the Eastern San Joaquin Groundwater Authority

The Technical Advisory Ad Hoc Committee has continued to meet after the revised Groundwater Sustainability Plan was submitted, without public notice. The lack of transparency and access to important discussions relating to the technical consideration as the plan is implemented puts stakeholders in a not in the “know” and not at the “table” position. No stated purpose for the “standing TAC” that would preclude Brown Notice requirements has been provided.

Thank you for your consideration. These comments will also be uploaded to the DWR SGMA Portal.

Sincerely,



Mary Elizabeth M.S., R.E.H.S.
Delta Sierra Group Conservation Chair, Sierra Club