



SIERRA CLUB

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MOTHER LODE CHAPTER

8.10.2022

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

Re: Response to Steering Committee Memo dated 8.3.2022 and Minutes of the 7.13.2022 Steering Committee

We have reviewed the 8.10.2022 Steering Committee Agenda Packet¹ which included a memo regarding comments on the revised Groundwater Sustainability Plan. We would like to respectfully offer another perspective to the statement “Drafts of the materials were provided to the GSAs and the GWA held public meetings to review draft materials starting in November and on through July 13, 2022.

No draft revised Groundwater Sustainability Plan or Technical Memoranda were available to provide input to the Groundwater Authority Members during scheduled meetings between November through June 2022. A summary of the meeting times and dates has been provided to demonstrate the limited opportunities for the public stakeholders to engage in the development of the revised Groundwater Sustainability Plan:

- **1 hours December 2021:** Steering Committee 12.8.2021; 8:35-9:33 (DWR pre-incomplete letter included)
- **1.5 hours January 2022:** Steering Committee 1.12.2022; 8:30-10:00 (No minutes located not in June 1 or July 13 packet)
- **3 hours February 2022:** Board of Directors 2.9.2022; 9:09-11:53 (Multiple Ad Hoc Committees were formed that were not open to the public – excluding the public from engaging in the development of the revised Groundwater Sustainability)
 - March 2022: Board of Directors 3.9.2022; 10:33 – 11:19 (Revised GSP not on agenda)
- **1.5 hours April 2022:** Board of Directors 4.13.2022; 9:06-10:56 (Discussed coordinating and flow of information between Ad Hoc Committees and Groundwater Sustainability Agencies)
- **1.5 hour May 2022:** Board of Directors 5.11.2022 10:41-12:04 (An overview of the development of the four Technical Memoranda by the Ad Hoc Committees but no materials were made available for public review)
- **1 hour June 2022:** Steering Committee 6.1.2022; 9:32- 10:24 (Informed of the topics in the Technical Memoranda no further description available)
 - Informed Cancelled but no cancellation notice found: Board of Directors Friday, 6.24.2022; 10:30 -12:00. Comments were submitted.
- **3.5 hour July 2022:** Steering Committee followed by the Board of Directors 7.13.2022 (Adopted revised Groundwater Sustainability Plan about two weeks after revised materials were made available for public stakeholder review)

¹ http://www.esjgroundwater.org/Portals/0/Steering%20Agenda%20Package%208_10_22%20FINAL.pdf

Over the seven-month period since the Groundwater Authority became aware of problems with the Groundwater Sustainability Plan submitted to the Department of Water Resources in January 2020, there has been approximately 13 hours of public meetings with less than one-quarter related to any information about the preparation and development of the revised Groundwater Sustainable Plan. Drafts of the materials were provided to the Groundwater Sustainability Agencies but there was no substantive review of draft materials available for public review until the last week in June 2022, just three weeks before the revised Groundwater Sustainability Plan was adopted by the Groundwater Authority and submitted to the Department of Water Resources. There was no opportunity for public stakeholders to have comments considered before the final revised Groundwater Sustainability Plan was adopted and submitted to the Department of Water Resources.

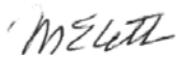
If an opportunity is provided to comment on the minutes of the July 13, 2022, Steering Committee I will convey the following information. A Director of the Groundwater Authority Steering Committee expressed several times that he wanted to have neighboring Groundwater Sustainability Agencies share new well permit information because his Groundwater Sustainability Agency has experienced well interference when a new well was installed. A discussion ensued and he asserted again that he wanted the information shared with neighboring Groundwater Sustainability Agencies. No mention of this request for cooperation was included in the minutes. According to the San Joaquin County Counsel correspondence dated 6.20.2022 “recordings are not maintained after the minutes are prepared and will not be posted on website or be made available.” The omission of this very important concern seems deliberate to give the impression that all desire a ministerial approach with little regard to effects on nearby shallow wells which maybe older but in operation and providing valuable water resources for domestic and small farm uses.

The Technical Advisory Ad Hoc Committee has continued to meet after the revised Groundwater Sustainability Plan was submitted, without public notice. An announcement of the ongoing Eastern San Joaquin Groundwater Authority Technical Advisory Committee Meeting to be held on 8.4.2022 at 10:30 was made available in 8.2.2022 minutes of the Stockton East Water District accessed 8.7.2022. No notice of the meeting was listed on the Agenda page of the Eastern San Joaquin Groundwater Authority website accessed 8.7.2022. 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. The rationale put forth for having private Technical Advisory Committee meetings is to discuss the revision of the incomplete Groundwater Sustainability Plan and from the Steering Committee Memo dated 8.3.2022 the revised Groundwater Sustainability Plan was submitted after all of the Groundwater Sustainability Agencies adopted prior to 7.27.2022.

We hope that meeting transparency will be enhanced with recordings of meetings posted for public review. Additionally, our 6.22.2022 correspondence outlined other important issues related to public outreach such as following the Stakeholder and Engagement plan included in the Groundwater Sustainability Plan and having evening meetings.

Thank you for your consideration.

Sincerely,



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