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8 January 2019

Re: Draft Interim Municipal Service Review and Sphere of Influence Update for the City of Stockton

Thank you for the opportunity to provide comments on the Draft Interim Municipal Service Review and Sphere of Influence Update for the City of Stockton. I understand that at some time in the near future there will be another report prepared which eliminates references to the 2035 City of Stockton General Plan. The Sierra Club provided comments on the Draft EIR and 2040 General Plan update. Please consider including these comments, specifically regarding the roles and responsibilities of the City of Stockton Groundwater Sustainability Agency, in the final Interim Municipal Service Review and in future updated review reports.

The Delta Sierra Group has been involved with the development of the Eastern San Joaquin Sub-basin Groundwater Sustainability Plan and the development of the Joint Powers Authority which formed the Eastern San Joaquin Groundwater Authority (replacing the GBA which has not been dissolved but is not meeting regularly). The information in the Urban Water Management Plans for the City of Stockton and California Water Service does not coincide with the Groundwater Sustainability Agency (GSA) boundaries for the City of Stockton GSA and the San Joaquin County GSA No.2.

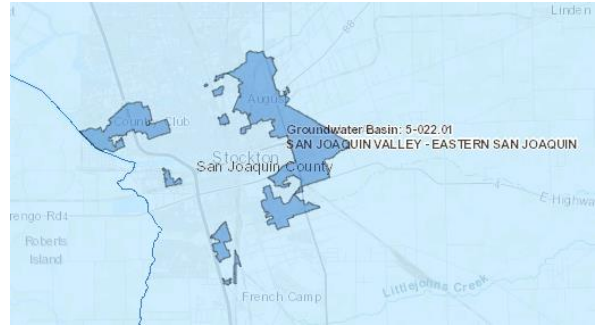
Draft Interim Municipal Service Review and Sphere of Influence Update for the City of Stockton
Chapter 5 Excerpt:

Sustainable Groundwater Management Act

In December 2015, the City joined with Cal Water to form a GSA to participate in the management of the Eastern San Joaquin Groundwater Basin. SEWD and WID have also proposed the formation of GSAs, but there are overlaps between them. The City and Cal Water are coordinating with SEWD and WID to refine the boundaries of the GSAs.

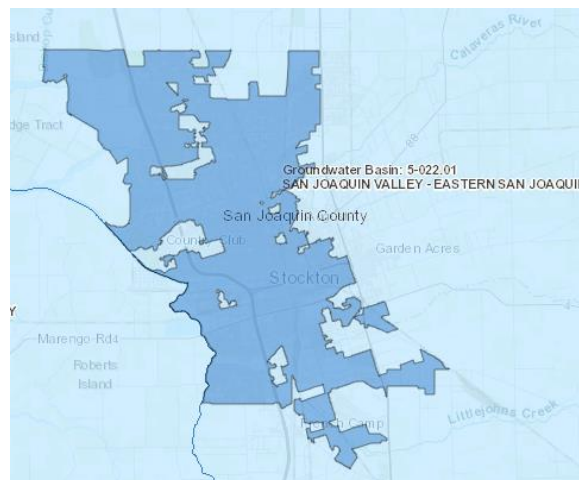
The San Joaquin County GSA No.2 is shown in the adjacent figure and is described in the GSA Formation Documents submitted to the Department of Water Resources in July 2017¹ as follows:

This new San Joaquin County GSA No. 2 is a carve out of the existing San Joaquin County GSA. The area included is the unique unincorporated County areas in the Stockton area which receive water service from Cal Water. The County and Cal Water have signed a Memorandum of Agreement which provides a mechanism for Cal Water to participate with the other GSA's in development of the Groundwater Sustainability Plan within the Eastern San Joaquin Subbasin. The MOA does not convey to Cal Water any of the County's SGMA authorities. *(note: I replaced \$ with apostrophes)*



The City of Stockton GSA is shown in the adjacent figure and is described in the GSA Formation Documents submitted to the Department of Water Resources in July 2017² as a single agency GSA and as follows:

The City of Stockton's service area boundary extended beyond the city limits; as part of the coordinated efforts in the East San Joaquin sub-basin, the City limited its GSA to the current city limits boundary.



The City of Stockton adopted Resolution No. 2017-07-11-1404 authorizing the City Manager to sign the Joint Powers of Agreement to include the City of Stockton GSA in the Eastern San Joaquin Groundwater Authority.³

Each GSA must develop a water budget and to date all data provided by City of Stockton and California Water Service to the Eastern San Joaquin Groundwater Sustainability Workgroup has been based on their agency boundaries not the boundaries of each GSA.

The City of Stockton as a GSA has been informed of their duties to do public outreach by members of the public as well as the Eastern San Joaquin Groundwater Authority which now requires GSAs to report monthly their public outreach efforts

¹ <https://sgma.water.ca.gov/portal/gsa/print/389>

² <https://sgma.water.ca.gov/portal/gsa/print/137>

³ https://stockton.granicus.com/MetaViewer.php?view_id=48&clip_id=5938&meta_id=509170

The Department of Water Resources has developed several guidance documents one of which is the Guidance Document for Groundwater Sustainability Plan Stakeholder Communication and Engagement (January 2018) which states the following:

Under the requirements of SGMA, GSAs must consider interests of all beneficial uses and users of groundwater. As a result, the GSP development needs to consider effects to other stakeholder groups in or around the groundwater basin with overlapping interests. These interests include, but are not limited to, holders of overlying groundwater rights (including agriculture users and domestic well owners), public water systems, local land use planning agencies, environmental users, surface water users, federal government, California Native American tribes, and disadvantaged communities (Water Code 10723.2). Furthermore, the GSP Regulations require that GSAs document in a communication section of the GSP the opportunities for public engagement and active involvement of diverse social, cultural, and economic elements of the population within the basin. Expertise of stakeholders may increase the chance that the GSAs are using best available information and best available science for GSP development.

Despite multiple requests made to the Stockton City Council, Stockton City Council Water Committee, City Stockton City Council Environmental and Legislative Committee, and at the Stockton Water Advisory Group, to include agenda items to update the governing body and residents on the progress of the development of the groundwater sustainability plan (GSP), no updates have occurred. The last time that City Council discussed the GSP was Resolution 2018-01-23-110 to approve the local cost share for development of the Groundwater Sustainability Plan that occurred in January 2018⁴. Furthermore, the City of Stockton has failed in its governance duties to post notices or press releases about the public meeting that are occurring at the Eastern San Joaquin Groundwater Authority level.

Thank you for the opportunity to provide these comments to clarify the roles and responsibilities of the City of Stockton Groundwater Sustainability Agency. If I can provide any further clarification, I can be reached at mebeth@outlook.com or P.O. Box 4557, Stockton CA 95204.

Sincerely,



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

⁴ http://stockton.granicus.com/MinutesViewer.php?view_id=48&clip_id=6077