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San Joaquin County Water Advisory Commission  
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July 10, 2019

RE: draft *Memorandum of Understanding of the Integrated Water Management Planning Coordinating Committee Members to form a Regional Water Management Group* distributed at the June 19, 2019 Water Advisory Commission Meeting.

The Delta-Sierra Group of the Sierra Club has reviewed the draft Memorandum of Understanding (MOU) and has prepared comments for consideration when drafting the final MOU. The Delta-Sierra Group supports increasing the diversity of advisory committees to better reflect our community, especially the disadvantaged communities throughout San Joaquin County.

Our understanding is that the proposed Regional Water Management Group is the Integrated Water Management Planning Coordinating Committee which is also known as the Coordinating Committee or Greater San Joaquin County Coordinating Committee. The purpose of the MOU is to form a coordinating committee of members that wish to participate in the integrated regional water management (IRWM) planning. Clarifying the title of the MOU will help stakeholders to understand the purpose of the MOU and purpose of the Regional Water Management Group. Perhaps instead of Coordinating Committee, use Greater San Joaquin County Regional Water Management Group.

We recommend adding as a goal of the Coordinating Committee the following: **To develop an outreach plan so that stakeholders can learn about the Committee to increase representation of diverse stakeholders on the Coordinating Committee.**

We have discussed the process for organizations to get involved and while we appreciate the ease by which an organization can become a member of this very important Coordinating Committee, we are concerned that individuals may say they are representing an organization when in fact they are not. Currently, on the San Joaquin County Water Advisory Commission is an individual that was appointed to represent environmental interests who is not a member of any environmental organization. Attached is a list of currently designated agencies and types of representatives. If an organization is to have a designated representative on the Coordinating Committee at minimum there should be a letter of support from the organization in addition to the signature page.

The draft MOU states that members could include, but not be limited to, organizations such as water agencies, conservation groups, agriculture representatives, community action groups, businesses, tribal groups and land use entities. Groundwater is an important regional water issue and within the Eastern San Joaquin Groundwater Subbasin lies land located in Calaveras and Stanislaus Counties. There was no direct inclusion of their representation on the Regional Water Management Group. The use of "Greater San Joaquin County" may imply their inclusion, but we are still unclear if this will be strictly a San Joaquin County group. Additional language is needed to ensure that the Coordinating Committee includes enough diversity. We suggest: **The Coordinating Committee will continue outreach efforts until such time as a finding is made that the Coordinating Committee is sufficiently diverse.**

The draft MOU also makes leaving very easy with simple notification. As discussed at the June 2019 Advisory Water Commission meeting, the Sierra Club supports a similar signature page for leaving and would encourage consideration of language in the MOU that should an entity on the Coordinating Committee fail to regularly attend meetings that the Coordinating Committee will notify the entity that based on attendance the entity will no longer be a member. The number of acceptable absences should be based on the frequency of meeting but at minimum no more than 3 consecutive meetings or cumulatively greater than 50 percent absences.

The timing of the Greater San Joaquin County Regional Water Management Group is of concern because discussions at the Advisory Water Commission meeting have indicated that the meetings will be held immediately following the Advisory Water Commission meeting which begins at 1:00 pm. Many individuals representing diverse community interests including environmental interests are volunteers, and unless retired are generally not available in the middle of the workday. The ESJ Groundwater Sustainability Workgroup established to represent various stakeholder groups within the basin had extensive polling and it was found that 4:00 to 5:30 pm was an optimal time that was suitable for those attending the meeting as part of their paid employment and for volunteers to miss a minimal amount of work.

We would like to suggest that those serving on ESJ Groundwater Sustainability Workgroup be invited to participate in this proposed Regional Water Management Group. Ongoing tasks for the ESJ Groundwater Sustainability Workgroup are under discussion and likely will be limited to review of periodic implementation reports or disbanded.

Finally, the time for development of a decision-making charter seems overly ambitious as it is proposed to be prepared at the inaugural meeting. Perhaps change the wording to “begin to prepare” instead of “will prepare” as some members will need to take this important draft decision-making charter back to their organizations which may have comments.

Thank you for considering our comments on the draft MOU.

Sincerely,



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

Below is a list of agencies currently involved with the Advisory Water Commission

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| A) North San Joaquin Water Conservation District   | O) Oakdale Irrigation District   |
| B) Stockton East Water District                    | P) Irrigation & Water Districts of Southwestern San Joaquin County which are not specifically listed above |
| C) Central San Joaquin Water Conservation District | Q) At-Large Representative who is a Consumer of Water  |
| D) South Delta Water Agency                        | R) Board of Supervisor Member  |
| E) Central Delta Water Agency                      | S) Environmental/Fish & Wildlife Organization Member   |
| F) Woodbridge Irrigation District                  | T) Urban Flood Control Reclamation District  |
| G) City of Stockton                                | U) Urban Flood Control Reclamation District  |
| H) City of Lodi                                    | V) Building and Construction Industry  |
| I) City of Manteca                                 | W) General Business Community  |
| J) City of Ripon                                   |  |
| K) City of Escalon                                 |  |
| L) City of Tracy                                   |  |
| M) City of Lathrop                                 |  |
| N) South San Joaquin Irrigation District           |  |