



SIERRA CLUB

DELTA-SIERRA GROUP
MOTHER LODE CHAPTER

*Delta-Sierra Group
Mother Lode Chapter
P.O. Box 9258
Stockton CA 95208*

TO: Eastern San Joaquin Groundwater Authority

DATE: February 9, 2022

RE: GWA 2.9.2022 Comments

These are comments that were provided at the 2.9.2022 Eastern San Joaquin Groundwater Authority meeting.

Website <http://www.esjgroundwater.org/> should include more information including a link to the public groundwater database published in conformance with SGMA regulations

- The last groundwater report posted was from 2015. All groundwater reports available should be posted.
- The last annual report posted for the public is a draft for water year 2020 dated March 2021. On the DWR SGMA Portal is posted an April 2021 report. Reports posted on SGMA Portal should be the same as posted on the Eastern San Joaquin Groundwater Authority website.

Outreach More is Needed

- All meetings advertised as public should have an agenda item for public comments on agenda items and/or not an agenda item.
- All meetings recorded should have those audio and video recordings posted on the website.
- All presentations should be posted on the website for those only able to access the meeting by phone or to refer to during viewing of a posted recording.
- The last outreach attempt recorded was an event on 7.22.21, during working hours with no recording link posted, that was sponsored by City of Ripon, Escalon, and South San Joaquin Irrigation District. The last other outreach was in 2019.
- Subbasin-wide outreach to stakeholders should occur as least annually to regularly inform interested groundwater users, in the early evening, with video recordings available for those not able to attend.
- The GWA Stakeholder and Engagement plan included an evaluation of outreach efforts throughout the implementation period. This has not been done to my knowledge based on available information. Outreach should be a priority not an afterthought.

DWR Incomplete Comments

Pushing back on DWR's comment to include specific projects and management actions to offset drought related groundwater reductions or drinking water impacts due to continued overdraft, ignores the fact that the Groundwater Sustainability Agencies are not managing well installations and pump lowering efforts.

Continued permitting of large irrigation wells without regard to how those wells will impact neighboring wells does not create an equitable situation for domestic well or small groundwater system stakeholders. Domestic well owners and small groundwater system users bear the burden, of Groundwater Sustainability Agencies' lack of management actions, with dry wells and/or increased pumping costs with lowered pumps.

Yes, groundwater levels decline during dry years, but increased groundwater extractions related to new well installations and continued overdrafting pumping rates create an added burden on domestic well and small groundwater system stakeholders. These groundwater impacts require mitigation and careful consideration of specific projects and management options to mitigate not a push back response.

Sincerely,

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