



Delta-Sierra Group
Mother Lode Chapter
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Eastern San Joaquin Groundwater Authority
Board of Directors, Advisory Committee, and Workgroup
P. O. Box 1810
Stockton, CA 95201
via email: esjgroundwater@sjgov.org

3 February 2019

Re: Groundwater Dependent Ecosystems

I began asking for information regarding the methodology used for the identification of groundwater dependent ecosystems (GDEs) beginning in June 2018 through the latest meeting of the Eastern San Joaquin Subbasin Work Group January 2019.

June 11, 2018 Delta Sierra Group correspondence to the Eastern San Joaquin Groundwater Authority¹

Can the model be used to perform a vulnerability analysis specifically relating to human and ecological communities that may be affected by management decisions, such as domestic well depths and species habitat, and groundwater-dependent ecosystem locations?

July 2018 Groundwater Authority Advisory Committee²

Additional Steps: Reviewing GDE Groundwater Needs

- Starting with data from The Nature Conservancy and ground-truthing to eliminate obvious non-GDE areas
- Reaching out to Department of Fish and Wildlife to prioritize areas with highest ecological value

Ms. Watson noted that the screening portion would be done prior to next meeting. ³

August 2018 Groundwater Authority Advisory Committee Meeting⁴

Assessing GDEs

- Started with data from The Nature Conservancy and ground-truthing to eliminate obvious non-GDE areas
- Removed drainages, canals
- Applied 300-ft buffer from losing stream midlines

GDE Next Steps

- Review buffer width
- Review shallow GW levels adjacent to remaining potential GDEs
- Coordinate with Department of Fish and Wildlife to prioritize areas with highest ecological value

¹ http://www.esjgroundwater.org/Portals/0/assets/docs/agendas/2018/GWA_Advisory%20Committee_Agenda_07112018%20with%20attachments_1.pdf

² http://www.esjgroundwater.org/Portals/0/July11_2018%20Advisory%20Committee%20Slides%20rev5jul18.pdf

³ http://www.esjgroundwater.org/Portals/0/GWA_Advisory%20Committee_Agenda_08082018%20with%20attachments.pdf

⁴ http://www.esjgroundwater.org/Portals/0/Aug8_2018%20Advisory%20Committee%20Slides_REVISIED.pdf

Ms. Watson presented on and facilitated a discussion around groundwater-dependent ecosystems (GDEs). Mr. Ward asked if mapping vegetation type will help in screening for GDEs (for example, mapping phreatophytes, with field verification to rule areas in and out). Ms. Watson noted this is part of the next steps, and what is presented in this meeting is the coarse first filter, done by removing areas that are screened out in desktop analysis. Following this first step, we will work with a biologist to refine and prioritize significant areas. Ms. Watson then defined losing streams as streams that lose water to the groundwater system. She defined GDEs as wetland areas not adjacent to or fed by surface water but that are dependent on groundwater for root zones.

I asked more details to describe the mechanism or approach for filtering out GDEs⁵

August 2018 Groundwater Authority Advisory Committee Meeting

I expressed my concerns regarding GDE identification.

Advisory Committee Meeting Minutes November 14, 2018 (distributed by email 1.4.19)

The minutes indicate that I had previously requested information regarding the methodology used to identify the groundwater dependent ecosystems (GDE) to be used in the GSP. She indicated that an NGO asked about this, and she was not able to provide an update.

Additionally, I noted that requests for information in writing had been submitted as comments to the technical advisory group (now Advisory Committee) which had not yielded any additional information nor have been responded to, in written form or by email. I indicated that the group is to have an actively engaged public outreach and noted that this is not occurring.

Work Group Meeting January 9, 2019

After I brought up my request at the January 9, 2018 Workgroup meeting, Paul Wells, DWR subsequently provide me with the Department of Fish and Wildlife SGMA contact information for Briana Seepy. I reached out by telephone to discuss the status of Department of Fish and Wildlife's involvement with the Eastern San Joaquin Subbasin and spoke with Briana Seepy. I followed up the telephone conversation with an email to verify my summary:

As of Nov 30, 2018, California Department of Fish and Wildlife (CDFW) was not aware of ESJ-specific GDE selection methodologies or preliminary GDE maps screened through the Natural Communities Dataset. Christie Kennedy was in attendance at the CDFW Region 2 SGMA Workshop November 30, 2018 meeting when the Yuba Subbasins' draft GDE identification methodology was presented to CDFW staff. There has been no ESJ-specific meeting held between Woodward and Curran representatives and CDFW staff on GDE selection.

Briana further noted:

Woodard and Curran has been intentional about requesting our input on these types of processes.

I subsequently reached out personally to Christie Kennedy by email to understand her perspective and wondering whether or not there was another DFW contact with which the consultants were coordinating with Department of Fish and Wildlife to prioritize areas with highest ecological value. I received the following response:

⁵ http://www.esjgroundwater.org/Portals/0/GWA_Advisory%20Committee_Agenda_09122018%20with%20attachments.pdf

Our contact at CDFW is Bri Seapy (contact block pasted in below). As you noted we met with them focused on the Yuba basin and shared the methodology to get their preliminary input on assumptions, etc. Each basin will be a little different but some of the basic methodology for conducting the assessment is similar.

Based on my conversations with representatives from the Department of Fish and Wildlife and the Eastern San Joaquin Subbasin consultant Woodward and Curran, there is a perspective difference on the degree of consultation and the completion of “next steps coordinate with Department of Fish and Wildlife to prioritize areas with highest ecological value.”

Groundwater Dependent Ecosystems are specifically defined under the Sustainable Groundwater Management Act (SGMA) as “ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface.” GDEs may get water only partially from groundwater. If there are other sources of water, such as surface water or supplemental water, that doesn’t disqualify them as a GDE. Second, if irrigation water or surface water (e.g., losing reaches) recharge groundwater, that again doesn’t disqualify the local ecosystem from being a GDE. An evaluation of nearby wells and shallow groundwater levels is necessary to assess whether or not if the potential GDE meets the thresholds for plant roots to access the groundwater.

The co-occurrence of wells, groundwater levels, nearby sources of recharge and potential GDEs is necessary because the County’s Water Well Ordinance⁶ requires:

3.1. All water wells (excluding monitoring wells) shall be located at an adequate horizontal distance from potential sources of contamination and pollution. The following minimum Distances shall be maintained: 50 feet from Stream, Creek, River, Canal.

We look forward to reviewing the methodology that is planned to be used to determine groundwater dependent ecosystems within the Eastern San Joaquin Subbasin when evaluating potential adverse effects.

Sincerely,



Mary Elizabeth M.S., R.E.H.S.
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⁶ <https://www.sjgov.org/uploadedfiles/sjc/departments/ehd/forms/well%20standards.pdf>