

MEMORANDUM

Date: January 10, 2020
To: Board of Directors
From: Mark Martin, General Manager
Subject: Proposed Revised Groundwater Sustainability Agency (GSA) Boundary Adjustment between Sacramento Central Groundwater Authority (SCGA) and Sloughouse Resource Conservation District (SRCD) Impacting Rancho Murieta

In past communications to the Board, I have mentioned an action whereby the SCGA in November 2019 entered into a settlement agreement with SRCD expressing the intent to negotiate areas of responsibility in the capacity of Groundwater Sustainability Agency (GSA) responsible for preparation of Groundwater Sustainability Plans (GSP). RMCS D has participated as a voting Board member of the SCGA for over a decade. In late December, the Executive Director of the SCGA, Darrell Eck, contacted me to bring to my attention the fact that RMCS D sits within the potentially negotiated jurisdictions of one or both GSAs. Mr. Eck conveyed that RMCS D would have the option of selecting the GSA where it would like to participate for preparation of a GSP.

Right now, in regard to groundwater management, RMCS D is split into three areas. West and southwest is the South American Sub-basin governed by SCGA. South of the Cosumnes River is the Cosumnes Sub-basin governed by SRCD. The remainder of the RMCS D district, the northeastern part, is essentially not a part of an identified sub-basin and from my understanding is not subject to the jurisdiction of a GSA.

For the purposes of Board discussion and of potential concern to the RMCS D, is the currently proposed GSA Boundary adjustment which would potentially cede the SCGA portion of the RMCS D district to SRCD. Given my prior discussions with SCGA staff on the extent of the South American Sub-basin which lies largely north of the Cosumnes River, it was my understanding the South American Sub-basin physically extends into the western portion of the RMCS D District. Since this portion of the South American Sub-basin is the very area within the RMCS D that has been identified as most viable for a future well, and the demands on groundwater from that area would be impacted largely by SCGA members within that basin, from my perspective, it does not seem to make sense that SRCD would govern the RMCS D area currently part of SCGA since the area is less hydrologically tied to the Cosumnes Sub-basin which is the primary sub-basin that impacts SRCD interests which are largely agricultural.

Why should RMCS D be concerned about which GSA oversees the Rancho Murieta area? First, RMCS D should be concerned about which GSA oversees where the RMCS D's prime well site area is located. It is acknowledged the District is not currently actively pursuing a well but should be concerned about this interest in the event the desire resurfaces. Second, there are concerns about RMCS D's interests being ceded to a GSA where RMCS D does not sit as a board member and where RMCS D would be asked to contribute to that GSA's preparation of a plan where that GSA's overall area of responsibility appears to be less relevant to RMCS D's long-term groundwater, surface water and groundwater recharge interests. One last consideration is that SRCD currently does not appear to have a clear plan on how agencies or parcels within their GSA would be assessed for initial preparation and future revisions of the Groundwater Sustainability Plan (GSP), not to mention contributions for ongoing GSA functions such as monitoring and reporting and other soon to be perpetual administrative obligations SRCD is required to assume as a GSA. In contrast, SCGA has a rate study near completion that provides greater clarity on assessment of their members.

With the information we have today, my preliminary recommendation is that RMCS D advocate that the area currently under SCGA's area of influence remain with the SCGA GSA. At this time there is no clarity as to RMCS D's expected contribution to the Cosumnes GSA for that portion of RMCS D that sits within that jurisdiction if RMCS D continues to fall under the SCGA's and SRCD's GSA jurisdictions.

Why was RMCS D not involved in discussions until now? At the January 8, 2020 SRCD Board meeting, an SRCD Board member admitted that not including RMCS D in the boundary adjustment working group discussion was an oversight. It also appears that RMCS D may not have been consulted when SRCD originally submitted their requested GSA boundary adjustment to the state in 2016 which was a standing requirement. It was at the same meeting where another SRCD Board member mentioned that with the proposed boundary adjustment, it was likely SRCD would assume RMCS D's voting position on the SCGA Board, but I have not confirmed that fact. If this is the case, then RMCS D's role as a Board member with SCGA would cease. Going forward, I feel it is important for staff to engage future SCGA/SRCD working group meetings where the GSA agreement is being worked out including GSA boundaries. The next working group meeting is scheduled for the end of January 2020.

Attached is a map that reflects the area of concern and proposed boundary adjustment, along with a map that shows a larger area map showing the extent of the South American and Cosumnes Sub-basins.