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 Sloughhouse 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). RMCSD 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 RMCSD sits within the potentially negotiated jurisdictions of one or both GSAs. Mr. Eck conveyed that RMCSD 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, RMCSD 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 RMCSD 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 RMCSD, is the currently proposed GSA Boundary adjustment which would potentially cede the SCGA portion of the RMCSD 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 RMCSD District. Since this portion of the South American Sub-basin is the very area within the RMCSD 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 RMCSD 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 RMCSD be concerned about which GSA oversees the Rancho Murieta area? First, RMCSD should be concerned about which GSA oversees where the RMCSD'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 RMCSD's interests being ceded to a GSA where RMCSD does not sit as a board member and where RMCSD 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 RMCSD'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 RMCSD 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 RMCSD's expected contribution to the Cosumnes GSA for that portion of RMCSD that sits within that jurisdiction if RMCSD continues to fall under the SCGA's and SRCD's GSA jurisdictions.

Why was RMCSD not involved in discussions until now? At the January 8, 2020 SRCD Board meeting, an SRCD Board member admitted that not including RMCSD in the boundary adjustment working group discussion was an oversight. It also appears that RMCSD 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 RMCSD's voting position on the SCGA Board, but I have not confirmed that fact. If this is the case, then RMCSD'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.



