

## Franklin Drainage District

**June 30, 2017**

Mr. Mark Nordberg, GSA Project Manager  
Senior Engineering Geologist  
California Department of Water Resources  
901 P Street, Room 213-B  
P.O. Box 942836  
Sacramento, CA 94236

Subject: Notice of Decision to Serve as a Groundwater Sustainability Agency for Portions of the South American Subbasin

Dear Mr. Nordberg,

Franklin Drainage District (“District”) provides this notice of its decision to serve as a Groundwater Sustainability Agency (“GSA”) pursuant to California Water Code section 10723.8. The District intends to undertake sustainable groundwater management of the South American groundwater subbasin, part of the Sacramento Valley Basin (DWR Basin No. 5-021.65) located within the District’s existing service area in Sacramento County. A map and shapefile showing the basin boundaries and proposed area of the GSA, which aligns with the District’s service area, is included.

The District is a California Drainage District under the provisions of the Water Code section 56000, et seq. As a California Drainage District, the District is a local agency with water supply and management responsibility, and therefore qualifies as an eligible agency for the purposes of GSA formation under the Sustainable Groundwater Management Act (“SGMA”). Furthermore, a statutory purpose of drainage districts includes conservation of water through groundwater recharge activities if necessary to achieve the sustainability goals of SGMA.

The District is located largely outside of the proposed boundaries of the Sacramento Central Groundwater Authority GSA, though there may be a minor overlap between the entities on the southeast portion of the District’s area. The District’s service area is within in the Sacramento Central Groundwater Authority’s proposed Alternative Plan area as reflected on the DWR’s GSA maps. The District has established communication with local officials and will cooperatively work with this local agency as well as other local stakeholders to resolve any GSA overlap and establish a suitable governance structure for the entire subbasin in order to achieve sustainability.

On June 30, 2017, the District held a public hearing to solicit input on the potential to become a GSA and to consider its decision to serve as a GSA for the portions of the groundwater basin within its boundaries. Notice of this hearing was published in *The Sacramento Bee*, a paper of general circulation in the basin, as required by Water Code section 10723 and Government Code section 6066. This notice is included as an Exhibit to this letter. Furthermore, an agenda was posted at the meeting place more than 24 hours prior to the District’s meeting pursuant to the Brown Act (Government Code, § 54954 et seq.). Following this public hearing the District adopted a resolution form a GSA. No other bylaws, regulations, or ordinances relevant to SGMA have been adopted at this time.

While the District is currently forming an independent GSA, the District is interested in joining with several other independent GSAs in the surrounding region to form the Northern Delta GSA, which would facilitate collaborative management the local groundwater resources. If this option is pursued, the GSAs

would likely enter into Memorandum of Agreement as contemplated by California Water Code section 10723.6. The specific makeup of this collaborative GSA, both in terms of the member GSAs and management structure, is being formulated at this time. The District will take all necessary steps to realize this cooperative GSA and communicate with DWR staff to ensure effective coordination.

The District has communicated with parties interested in the sustainable management of groundwater within the basin and will actively engage with, and solicit feedback from, those parties as the Groundwater Sustainability Plan (GSP) is developed. As required by Water Code section 10723.8, subdivision (a)(4), the District will consider the interests of all beneficial uses and users of groundwater, as well as those responsible for developing GSPs. These interests include, but are not limited to the following:

- ***Holders of overlying groundwater rights:***
  - *Agricultural users:* The basin area is composed almost entirely of agricultural users, most of whom have an existing relationship with the District. The District will communicate with the landowners to guarantee that they understand their on-going opportunity to participate in the development of a GSP for the basin, should a GSP be pursued.
  - *Domestic well owners:* There are domestic wells within the GSA. The District will communicate with these landowners to guarantee that they understand their on-going opportunity to participate in the development of a GSP for the basin.
- ***Municipal Well Operators:*** The District is adjacent to the community of Hood. There may be some overlap with the service area of the Hood Water Maintenance District. In any event, the District will collaborate with the community and its water provider to ensure their interests are considered and protected. The District will also seek input from adjacent GSAs and Sacramento County regarding municipal well operations in other portions of the South American Subbasin to ensure coordination with those entities.
- ***Public Water Systems:*** The District is adjacent to the community of Elk Grove, which receives water service from Sacramento County Water Agency—Laguna/Vineyard. This water system may have some overlap with the District, though it does not appear to. In any event, the District will collaborate with the Sacramento County Water Agency to ensure the interests of their ratepayers is solicited and taken into consideration during SGMA implementation.
- ***Local land use planning agencies:***
  - *Sacramento:* The District has communicated with the County related to its intention to serve as a GSA for the portions of the basin within the District's boundaries. The District will continue to communicate with and solicit feedback from the County throughout the GSP development and implementation process.
  - *Other Water, Irrigation, and Reclamation Districts outside of the GSA Boundaries:* The District has communicated with neighboring local resource agencies in the basin as a courtesy. The District will continue to communicate with, solicit feedback from, and foster cooperation among the neighboring agencies throughout the GSP development and implementation process.
  - *North Delta Water Agency:* This Agency, formed by a special act of the California Legislature, represents northern Delta interests to assure the lands within its boundaries receive a dependable water supply to meet current and future needs. The District has communicated with the North Delta Water Agency regarding that entity's decision not to

become a GSA. The District will continue to communicate with this entity during the GSP formation process.

- ***Environmental users of groundwater:*** The District will cooperate with any environmental users of groundwater in developing a GSP. A portion of the District includes the Stone Lakes National Wildlife Refuge, managed by U.S. Fish and Wildlife Service. Thus, the management of these public lands will be consulted during SGMA implementation.
- ***Surface water users, if a hydrological connection between surface water and groundwater resources exists:*** The District will coordinate with local surface water users to ensure their interests are considered during the GSP development and implementation process. Many of the surface water users have an existing relationship with the District already.
- ***The federal government, including, but not limited to, the military and managers of federal lands:*** The U.S. Fish and Wildlife Service manages the Stone Lakes National Wildlife Refuge, which is within a portion of the District. Refuge managers have been in conversations with the District regarding SGMA. This ongoing collaboration will ensure that the Refuge's interests are protected during the SGMA implementation process.
- ***California Native American tribes:*** There are no identified Native American tribes within the District's proposed GSA boundaries. Nevertheless, the District will coordinate with the appropriate state and federal agencies to ensure the interests of any tribes are represented.
- ***Disadvantaged communities, including, but not limited to, those served by private domestic wells or small community water systems:*** The District has not identified disadvantaged communities within its service area using DWR's web-based tools. There are some disadvantaged communities adjacent to the District though. The District will cooperate with Sacramento County to identify and work with any and all disadvantaged communities within the surrounding area relying on groundwater supplies to safeguard those communities' interests.
- ***Entities listed in Water Code section 10927 that are monitoring and reporting groundwater elevations in all or part of the groundwater basin managed by the GSA:*** The County of Sacramento and the Sacramento Central Groundwater Authority are both currently CASGEM monitoring entities within the District's service area. The District will continue to collaborate with these agencies as well as any other entities within the basin that collect groundwater data in order to coordinate on GSP development and implementation.

The District and other stakeholders' roles and responsibilities will be further defined in the GSP. The District welcomes feedback throughout this process from the state and any other agencies, organizations, or persons that have a vested interest in the management of this groundwater basin. Future meetings will be publicly noticed to encourage greater stakeholder participation and the list of interested parties will be continually updated as additional entities are identified. If the DWR requires any additional information, please contact the undersigned at (916) 668-7345 or by email at [erik@thefreshwatertrust.org](mailto:erik@thefreshwatertrust.org).

Thank You,

Erik Ringelberg

California Director

The Freshwater Trust

On Behalf of Franklin Drainage District