

# RESTORE HETCH HETCHY

*Yosemite National Park*

April 4, 2025

Kate H. Stacy, President  
Dennis Herrera, General Manager  
San Francisco Public Utilities Commission

Subject: Groundwater banking in the Central Valley

Dear President Stacy and General Manager Herrera:

I am writing again to encourage the San Francisco Public Utilities Commission to pursue opportunities to bank groundwater in the Central Valley.<sup>1</sup> Groundwater banking has the potential, at relatively low cost, to improve SFPUC water supplies while simultaneously helping agricultural communities to address critical aquifer overdraft. Improved supplies could then be used in a number of ways, including as a hedge against drought, to accommodate growth or for environmental enhancement.

Groundwater banking has been the most popular and successful approach for water supply investments in California for the last three decades, even before our landmark Sustainable Groundwater Management Act was passed in 2014. Farmers have invested in groundwater banking for their own use, and cities have invested in groundwater banking in rural areas (see attachment 1).

The SFPUC's Regional Groundwater Storage and Recovery Project (RGSR) is an excellent groundwater banking program, but it only provides a maximum of 61,000 acre-feet in additional storage. There is far greater opportunity in the much depleted "cone of depression" within the Eastside Water District – not far from the Tuolumne River and the SFPUC's San Joaquin Pipelines (see attachment 2).

In a 1993 study the SFPUC's own consultants described groundwater banking in the Eastside Water District as "ideal", but ranked the opportunity only as "fair" because of "institutional complexity".<sup>2</sup> While institutional complexity no doubt continues to be a challenge, California's Sustainable Groundwater Management Act has provided strong incentives for farmers in the Central Valley to find ways to recharge their aquifers.

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Excess water in the Tuolumne watershed is often available for groundwater recharge. For example, the river's annual flow, measured at Modesto, exceeded 1,000,000 acre-feet in 6 of the last 20 years (see Attachment 3). While some of those flows certainly provided important environmental benefits to the lower Tuolumne River and to the Sacramento-San Joaquin Delta, there could have been significant diversions for groundwater recharge that would have benefited both farming communities and SFPUC customers.

It is time to realize the substantial opportunity to improve water supply at low cost, and to address institutional address challenges directly and in good faith. The San Francisco Public Utilities Commission should engage Stanislaus County interests, including the Eastside Water District, the Turlock and Modesto Irrigation Districts, and the East Turlock Groundwater Sustainability Agency to develop and implement a groundwater recharge plan that would benefit all parties.

It is in everyone's interest to pursue this low hanging fruit as so many other California water agencies have done successfully.

Sincerely,

  
Spreck Rosekrans  
Executive Director

CC:

Alicia John-Baptiste, Mayor's Chief of Infrastructure, Climate, and Mobility  
Tom Smegal, Chief Executive Officer/General Manager, BAWSCA  
Tom Chambers, Chair, BAWSCA  
Peter Drekmeier, Tuolumne River Trust  
Sarah Woolf, General Manager, Eastside Water District  
Karla Nemeth, Director, California Department of Water Agencies

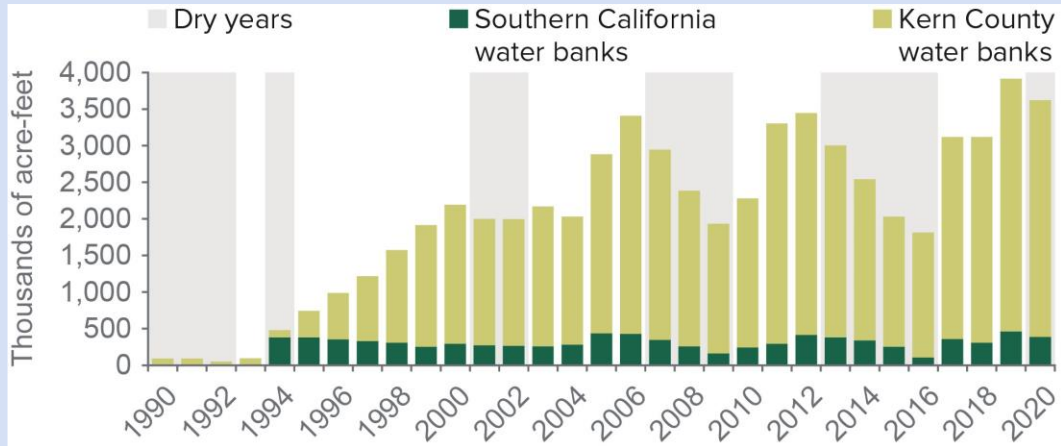
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<sup>1</sup> Previous communications include Restore Hetch Hetchy Comments on SFPUC Alternative Water Supply Plan (2023-8-25), RHH Groundwater Banking Presentation for Bay Area Water Stewards (2023-9-15), Group Flood-MAR letter re Tuolumne watershed (2024-7-16), in person meetings with staff and commissioners as well as public comments during Commission meetings.

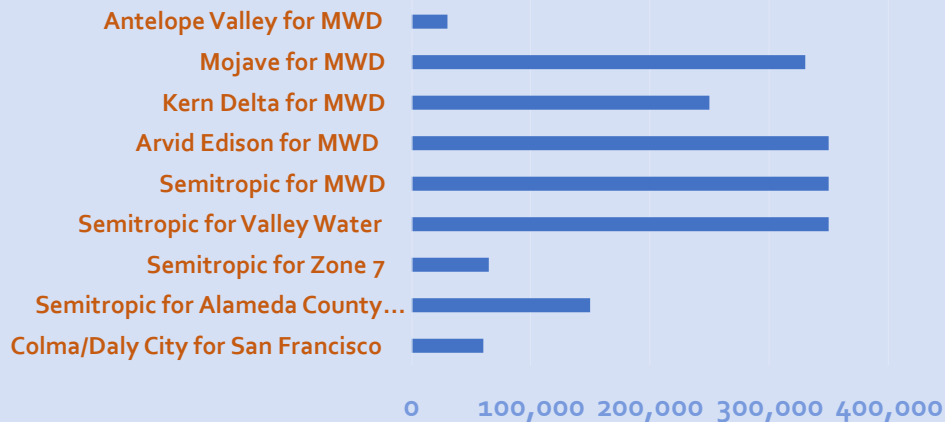
<sup>2</sup> City and County of San Francisco Hetch Hetchy Water and Power, Reconnaissance Evaluation of Alternative Sites for Groundwater Banking, Bookman-Edmonston Engineering Inc, and Luhdorff and Scalmanini Consulting Engineers, unpublished work July 1993



## PPIC groundwater “banking” data: ag and urban

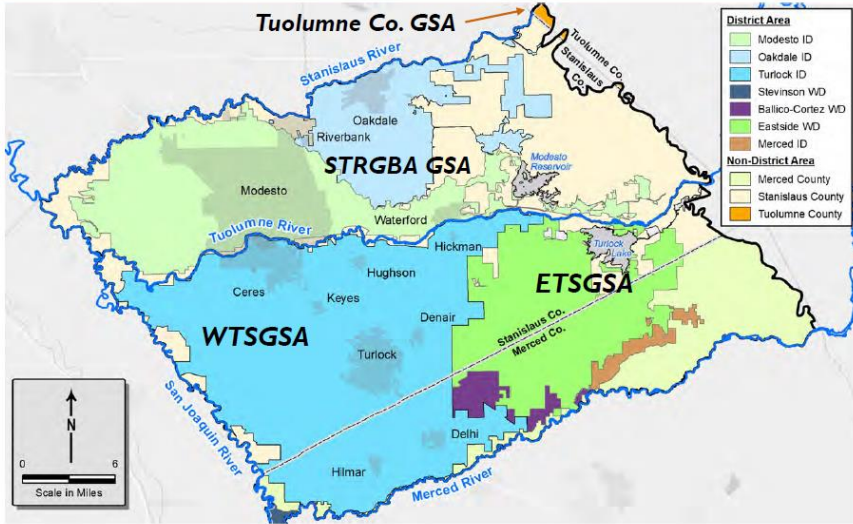


## Selected Groundwater Banking Projects for Urban Water Agencies in California (acre-feet)





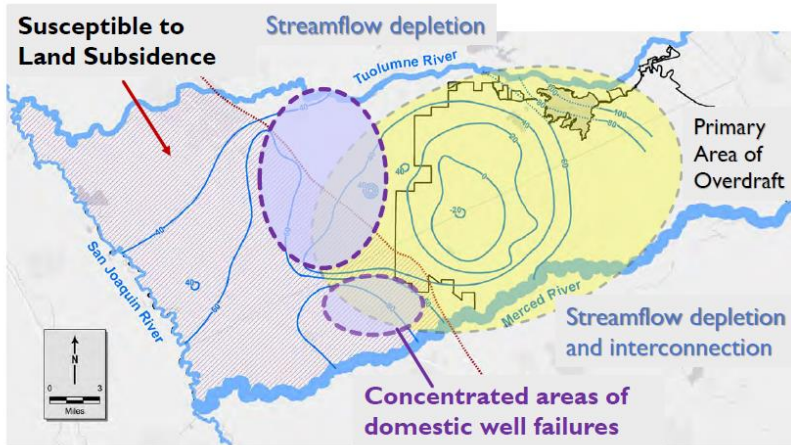
# GROUNDWATER SUSTAINABILITY AGENCIES (GSAs) AND LOCAL AGENCIES / URBAN AREAS



- Two GSAs in each Subbasin
- Tuolumne Co. GSA participates through agreement with Stanislaus County
- Many agencies overlap both subbasins:
  - Stanislaus County
  - City of Modesto
  - Waterford/Hickman
- Shared water resources from the Tuolumne River



# SUSTAINABILITY CONSIDERATIONS



- Declining groundwater levels and overdraft
- Water supply well impacts
- Streamflow depletion and possible disconnection along the Merced River
- Streamflow depletion on Tuolumne River
- Corcoran Clay and associated compressible clay layers susceptible to land subsidence

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Attachment 3

