



Friends of Five Creeks

*Volunteers preserving and restoring watersheds of
North Berkeley, Albany, Kensington, south El Cerrito and Richmond since 1996
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Members of the Board

East Bay Municipal Utility District

375 11th Street

Oakland, CA 94607-4240 (by email; underlines indicate links)

Cc: Clifford Chan, General Manager; Grace Su, SGMA Plan Manager

Board members, General Manager Chan, and Plan Manager Su:

I am writing to emphasize the need for EBMUD to revise its not-yet-approved State Groundwater Management Act plan to reflect realities of the threat of salt-water intrusion and rising groundwater in the East Bay Plain sub-basin.

At a Mar. 9 webinar on the plan, staff repeatedly said that the East Bay Plain ground water was in sustainable condition, evidently because levels are not not falling. Staff also stated that if the plan is approved, there are no plans to revise it before the mandated five years.

This bureaucratic narrowness contravenes the basic honesty that EBMUD owes ratepayers and all residents of the Bay Area. All research and plans so far – by the San Francisco Estuary Institute (SFEI), Bay Conservation and Development Commission, Association of Bay Area Governments, and National Oceanic and Atmospheric Administration – indicate that the greatest threats from sea-level rise in East Bay Plain area are rising groundwater (leading to local flooding and mobilization of toxics) and salt intrusion (with serious effects on infrastructure). The SFEI graphic on the next page illustrates large data gaps that the SGMA plan could help fill in.

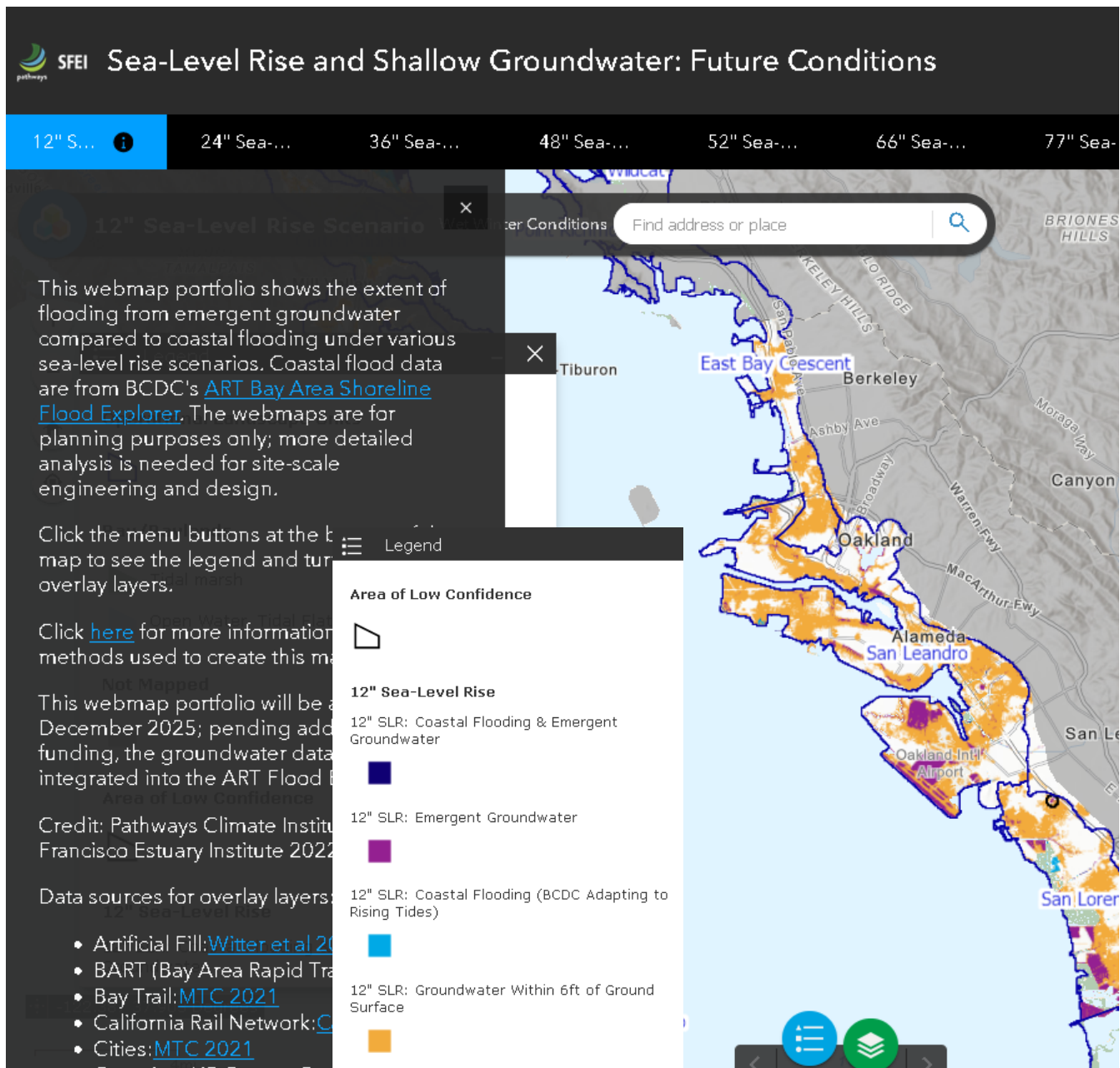
EBMUD can point out that since the 2014 Sustainable Groundwater Management Act focused on **falling** groundwater, the act and its rules don't require considering **rising** levels. In that case, EBMUD must still refrain from calling conditions "sustainable" without clearly and consistently adding that this refers only to a narrow, perhaps irrelevant, slice of reality.

SGMA and its rules do require considering significant and unreasonable seawater intrusion, as well as degraded water quality (that might result, for example, from rising groundwater mobilizing buried toxics). Does EBMUD maintain that since it lacks evidence of harm from salt intrusion or mobilized toxics so far, it can shut its eyes for the next 5+ years and not develop an adequate plan and monitoring network, including wells?

EBMUD and Hayward chose to be the exclusive creators of this plan. They can't single-handedly save the "flatlands" from rising groundwater and salt. They do, however, need to present a plan that will expeditiously fill gaps in knowledge, aimed at achieving true sustainability by 2042. The current proposed plan, with few proposed new wells or other investigations, and no expectation of adaptive management as knowledge grows, does not keep that promise.

We look forward to the EBMUD board and staff making the SGMA plan a useful and realistic contribution to the climate-change challenges we all face. Thank you for your attention to this important matter.

Susan Schwartz, President, Friends of Five Creeks



Preliminary predictions of groundwater conditions with 12" of sea level rise. Gray = not mapped, white = low confidence, orange = groundwater within 6 ft. of ground surface...

Source: San Francisco Estuary Institute and Pathways Climate Institute, Shallow Groundwater Response to Sea Level Rise, <https://www.sfei.org/projects/shallow-groundwater-response-sea-level-rise>