

Restore the Delta  
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December 4, 2024

Eastern San Joaquin Groundwater Authority  
1810 E Hazelton Ave  
Stockton, CA 95205  
*Sent via email: info@esjgroundwater.org*

**Re: Eastern San Joaquin Groundwater Authority's Draft Communications and Engagement (C&E) Plan**

To Whom It May Concern:

Restore the Delta (RTD) submits this letter to emphasize the importance of integrating our previous recommendations, as outlined in our letter dated [Oct 31, 2024](#), into the Eastern San Joaquin Subbasin's C&E Plan. Despite its intention to improve communication and transparency, the C&E Plan fails to address significant issues that are crucial for achieving equitable and sustainable groundwater management. A lack of these elements undermines the effectiveness of the plan and threatens the ecosystem and communities in the region.

These recommendations are not just suggestions; they are essential actions grounded in the public trust requirements outlined in the Sustainable Groundwater Management Act (SGMA). It risks compromising both the well-being of local stakeholders and its legal compliance by disregarding these concerns. Inaction has far-reaching consequences, potentially endangering the livelihoods of farmers, Tribal Nations, and disadvantaged communities.

**Our two main issues with the C&E Plan are the following:**

- Because the recommendations offered in the C&E Plan are voluntary measures that each of the 16 GSAs can choose to take up individually, we have little faith in the effectiveness of the plan to serve its intended purpose, especially since resources are not being distributed equitably across the subbasin for groundwater planning efforts.
- While we agree with some of the plan's recommendations, it fails to address several key outreach and engagement issues we highlighted in our Oct. 31 letter, and merely kicks the can down the road for a proposed work group that may never come to fruition to develop and implement more equitable community engagement strategies.

## **1. Purpose and Limitations of the C&E Plan**

The C&E Plan serves as a “multi-year implementation strategy for the ESJGWA and its member agencies to engage with beneficial users and uses of groundwater in the region during implementation and management of an approved GSP.” The plan provides a “roadmap for potential activities” that 1) supports the ESJGWA as it fulfills its coordination and collaboration objectives under the Sustainable Groundwater Management Act (SGMA); 2) assist various ESJGWA committees to fulfill their decision-making support functions for ESJGWA and subbasin Groundwater Sustainability Agencies (GSAs); and 3) assist each individual GSA as they work to achieve their operational, jurisdictional, and statutory obligations under SGMA.

According to the draft plan, the Authority’s role relative to GSAs is to offer “coordination, communication, and facilitation support”. Individual GSAs will decide to “either implement C&E actions for all requirements of SGMA or provide consent, guidance, and/or funding to the ESJGWA to collectively do so on their behalf.” Hence, the C&E Plan offers a “menu of C&E options from which the GWA and its member agencies can choose from as they strive to build capacity under SGMA for greater and more intentional engagement with the public when it comes to groundwater management.”

## **2. While we agree with many of the plan’s recommendations, it fails to address several key outreach and engagement issues we highlighted in our Oct. 31 letter, offers little substance or analysis for implementing the recommendations, and merely kicks the can down the road for a proposed work group that may never come to fruition.**

We agree with many of the “recommendations for activities and tactics” presented in the draft plan, however, we are generally disappointed with the lack of substance or additional analysis to support implementation of these recommendations.

For instance, we agree with the “Targeted Outreach” recommendation that GSAs “outline and implement specific efforts to identify, contact, educate, and engage with underrepresented groundwater users and non-English speakers on groundwater resource management in the Subbasin.” We understand this recommendation to be a follow up from the Authority’s communication to the Grand Jury that it would consider ways to expand language access in its “pending Communications and Engagement Plan” ([San Joaquin County Civil Grand Jury 2023-2024 Final Report](#)). The plan ultimately proposes that GSAs produce “guides and memos denoting strategies and best practices for engagement with underrepresented groundwater users” and identify “preferred translation and interpretation vendors.” The plan could’ve offered case studies or community engagement models for reaching specific groups (e.g. Promotora networks) and a general landscape assessment of efforts in the region to reach underrepresented communities (e.g. [Census Bureau outreach and communications strategy](#), [North Valley Thrive](#),

etc.). Further, since this tactic would “heavily benefit from close communication and coordination” with community-based organizations, we recommend GSAs ensure adequate resources are available to compensate community groups for their consultation time.

Many of the recommended activities and tactics appear to hinge on a proposal to form a “Small Community/Underrepresented Community Committee” that would engage on issues that affect underrepresented groundwater users. The plan is scant on details for the potential demographics, disciplines, or community-based organizations that would ideally be represented on this work group, and it offers no models or case studies to support development of a more refined mission and scope. We would be supportive of such a committee as a means to enable community-based experts to convene and establish more equitable outreach and engagement strategies, provided community organizations are well-resourced by the Authority and compensated for their time and expertise. We have little confidence, however, that the workgroup will be developed or well-resourced if its existence hinges on a majority decision of the 16 GSAs, three of whom have yet to develop a Groundwater Sustainability Plan in the first place.

**Additional feedback:**

- We appreciate general recognition of the value in developing partnerships with community-based organizations (i.e. “trusted outreach partners”) to expand and diversify outreach and engagement strategies. To that end, we support the “Speaker’s Bureau” recommendation for GSAs to develop relationships with non-governmental organizations and other community groups and attending/presenting at their meetings at a regular frequency to provide information on SGMA implementation. Restore The Delta has traditionally been a resource for Delta communities and policymakers contemplating new research and economic development opportunities relevant to the region (a [2023 survey](#) found we are the most trusted organization in the Delta). We affirm that developing a relationship and coordinating time for presentations to our members would be “one step in the right direction for trust building and improved engagement.” We encourage the Authority and its membership to take the additional step of formally recognizing the need for compensated consultation of community experts to develop and implement engagement strategies for reaching underrepresented communities.
- We agree with the “Comment Portal” recommendation that the GSAs and/or ESJGWA establish, maintain, and respond to public comments through an email contact portal that is publicly accessible at all times. Notably, we’ve still yet to receive a response to the letter we submitted to the Authority on Oct. 31. Timely response to comment letters should be a best practice to promote increased transparency, foster a more efficient community input process, and create opportunities for shared learning across various types of stakeholders from across the sub-basin.
- We appreciate the recognition of the need to “bridge” the “ag-urban divide” with dedicated outreach strategies to facilitate shared understanding on groundwater and

SGMA-related topics between agricultural communities and those that reside in urban/metropolitan communities; this objective is central to our mission at Restore The Delta.

- We agree with the “Website Management” recommendation for GSAs to establish web pages on the ESJGWA website with “clear and accessible audience-specific mapping, informational resources, notification processes for meetings or events, the GSAs’ and ESJGWA’s administrative and financial records, project and management action updates, governance structures, up to date meeting information and materials, decision-making structures, etc...”. We recommend that the Authority maintain a host of webpages, rather than each individual GSA, to eliminate potential for confusion or misleading information, and provide accountability to transparent communications practices for all of the GSAs.
- We support the concept of a “Communications and Engagement Tracker” that catalogues the type and timing of outreach manually input by the GSAs.
- We support the “Interested Parties Database” recommendation for a database with distributed content to keep groundwater users across the Subbasin informed of key updates and opportunities to engage in groundwater planning efforts.

Overall, Restore the Delta urges the Eastern San Juan Groundwater Authority to address the critical deficiencies in its draft Communication and Engagement Plan by integrating the recommendation outlined in the October 31, 2024 letter. While the plan’s intent to enhance communication and engagement is commendable, its voluntary and fragmented nature falls short of the robust and equitable framework necessary to fulfill SGMA’s public trust obligations and meet the needs of all stakeholders.

Without a stronger commitment to equitable resource distribution, actionable strategies, and accountability, the C&E Plan risks perpetuating systematic inequities and failing the communities and ecosystems it is intended to serve.

Restore the Delta remains committed to supporting these efforts and offers our advice. Thank you for reading and accepting our concerns.

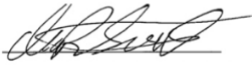
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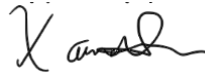
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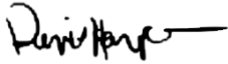
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