



Sacramento Groundwater Authority
*Managing Groundwater Resources
 in Northern Sacramento County*

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Edward D. Winkler
 Executive Director

August 16, 2005

California-American
 Water Company

Carmichael
 Water District

Citrus Heights
 Water District

City of Citrus Heights

City of Folsom

City of Sacramento

County of Sacramento

Del Paso Manor
 Water District

Fair Oaks Water District

Natomas Central Mutual
 Water Company

Orange Vale
 Water Company

Rio Linda / Elverta
 Community Water
 District

Sacramento Suburban
 Water District

San Juan
 Water District

Southern California
 Water Company

Agricultural and
 Self-Supplied
 Representative

Colonel Richard Ashworth
 United States Air Force
 SAF/IEE
 1665 Air Force Pentagon (Room 5C866)
 Washington DC 20330-1665

Mr. Timothy Swickard
 Director
 Department of Toxic Substances Control
 P.O. Box 806
 Sacramento, CA 95812-0806

Mr. Wayne Nastri
 Regional Administrator
 US EPA Region IX
 75 Hawthorne Street
 Mailcode ORA-1
 San Francisco, CA 94105-3901

Dear Colonel Ashworth and Messrs. Swickard and Nastri,

These comments are submitted by the Sacramento Groundwater Authority (SGA) in response to the United States Air Force's groundwater remediation program at the former McClellan Air Force Base (Base). We write to express our alarm with the Air Force's recent proposal to substantially reduce the scope and extent of groundwater remediation efforts at the Base. Specifically, we are troubled that the proposed new remediation program recommends only "containment" at the Base boundary, rather than full remediation of contaminated soils and groundwater; as you are well aware, other containment programs in the basin have proven ineffective to protect groundwater supplies in the region. We are also disturbed that we had to learn about this recent proposal in an article in the Sacramento Bee, rather than directly from the Air Force or the Air Force Real Property Agency (AFRPA). The Air Force must be held accountable for full clean-up and remediation of contamination at the Base and, toward that end, provide an appropriate public review and comment process prior to finalizing any such remediation program.

SGA Background

The SGA is a joint powers authority created through agreement between the cities of Citrus Heights, Folsom, and Sacramento and the County of Sacramento to manage the groundwater basin underlying Sacramento County north of the American River. The SGA's mission is to manage, protect and sustain the groundwater resources of Sacramento County north of the American consistent

with the Water Forum Agreement for the benefit of the water users within the basin. The SGA coordinates its groundwater management activities with other water management entities throughout the region, and protects the North Area groundwater basin on behalf of the 14 water purveyors overlying the basin. These 14 water purveyors rely to a large extent on groundwater supplies in the north area groundwater basin to meet the water demands of more than 500,000 people. The McClellan Air Force Base is located near the center of the North Area groundwater basin.

Concerns

The SGA first learned of the proposed ROD in an article published in the July 9, 2005 edition of the Sacramento Bee. The article states that the Air Force is proposing to substantially scale back its groundwater remediation efforts at the Base, and that these proposed changes are in response to changes in groundwater elevations in the vicinity of the Base due to changed operations of some of the local water purveyors. Following several discussions with the California Department of Toxic Substances Control and Central Valley Regional Water Quality Control Board, we confirmed at a meeting with the AFRPA on August 4, 2005 that the Air Force does in fact intend to “scale back” its remediation efforts at the Base.

We understand that the Air Force’s proposed “scaled back” remediation program is described in a “Draft Final Volatile Organic Compound (VOC) Record of Decision (ROD),” but to date the SGA and its affected member agencies have been denied access to the Draft Final ROD and associated documents. The Air Force also has failed (or refused) to solicit input from the SGA or its affected members concerning this proposed change in direction.

As noted above, the Air Force’s final remediation program must be designed to provide full protection of the beneficial uses of the North Area groundwater basin now and into the future. As such, the remediation program must include both containment and clean-up components. Given the magnitude of the resources at stake, the Air Force must provide an appropriate public review and comment process on any remediation proposal, and must actively seek input on the remediation program from those entities that use and manage the groundwater resource. The SGA is committed to working with the Air Force to develop a remediation program that fully protects our region’s valuable groundwater resources.

The Draft Final ROD Public Process

In June 2004, the AFRPA issued a Proposed Plan for Cleanup of VOCs in Groundwater. The SGA commented on the Proposed Plan in an August 3, 2004 letter to Mr. Brian Sytsma (attached). Our comments expressed concerns that the AFRPA’s assumptions for developing a cleanup strategy were flawed because the AFRPA assumed a continued decline of groundwater levels in the vicinity of the Base, when in fact groundwater levels have stabilized and are expected to fluctuate in the future. Our letter suggested that these assumptions be corrected and noted that the remediation proposal, as a whole, would be

improved if there were more effective communications between the AFRPA and the adjacent water purveyors that have the greatest potential to influence groundwater elevations in the basin. We stressed the need to facilitate more effective communication between SGA, the AFRPA and SGA's members as the remediation plan is developed. We did not receive a response to our letter.

We understand that AFRPA also issued an addendum in June 2004 indicating that groundwater conditions had changed significantly since their assumptions from the 1999 Basewide VOC Feasibility Study. We are puzzled that the Air Force did not provide us with this addendum at the same time that it requested comments on a Proposed Plan for Cleanup, and that the AFRPA requested comments on a Proposed Plan for Cleanup that included assumptions that even their own analyses proved to be incorrect. Moreover, had the AFRPA consulted more closely with local water purveyors in 1999, they would have known that their assumptions regarding a steadily declining groundwater table were not appropriate, as plans and programs to address declining groundwater levels already were well underway at that time. Despite our comments in August, 2004, the Air Force has yet to coordinate with the SGA and local water purveyors to better understand how the basin may be exercised in the future.

We are now surprised to learn that, rather than proposing better coordination with the purveyors in the area so as to develop a more informed remediation plan, the Draft Final VOC ROD was prepared without any input from those purveyors and proposes even less protection to our region's groundwater resources than the plan that the public commented on in August 2004. We request that the AFRPA actively seek input from the SGA and local water purveyors and convene an open and public process to allow those most affected by the Draft Final ROD – the local water purveyors and concerned citizens – an opportunity to review and comment on the proposed plan.

The Beneficial Use of the Groundwater Basin

It is well documented that groundwater levels in the north area basin have declined as a result of many decades of pumping, which has led to a substantial groundwater "cone of depression" in the center of the basin. It is also well documented that local water purveyors have invested over \$100 million constructing projects over the past decade to bring more surface water into the region in wet years to help reverse the trend of declining groundwater levels. These "conjunctive use" projects are, in part, in response to commitments made by the purveyors in signing the historic Water Forum Agreement (WFA) in April, 2000. The WFA seeks to implement a regional-scale conjunctive use program that will allow local water purveyors to reduce dry-year lower American River (LAR) diversions to protect endangered fish and other LAR environmental values. To accommodate higher groundwater pumping in the dry-years, purveyors must take actions to store groundwater in the wet years. This is the essence of a "conjunctive use" program, and has been a central component of our regional water management planning for more than a decade.

Because the area has experienced a fairly wet period since 1995, the local purveyors have

had more opportunities to utilize surface water that has allowed groundwater elevations to recover. Depending on hydrologic conditions and annual water needs in the north area basin, groundwater elevations within the basin are expected to fluctuate in the future. For instance, it is likely that groundwater extractions would increase if the region entered into another dry cycle, resulting in a lowering of groundwater elevations. **The presence or even the threat of a large area of contaminated groundwater in the center of the basin significantly imperils more than a decade of work and many millions of dollars invested in water management efforts in this region and is fundamentally unacceptable as policy.**

The Sacramento region has a complex, highly heterogeneous geologic setting with many buried river channel deposits that can create preferential flow paths for groundwater and contaminants. As local residents are too frequently reminded, the containment strategies employed in other areas of the County, such as the Aerojet General site in Rancho Cordova, have proven ineffective. The geologic setting of buried river channels makes containment very difficult. The data emerging from the Aerojet site indicate that the contaminants are moving out in “fingers” and much of the monitoring has been ineffective at detecting the extent of contaminant migration.

Requested Action and Summary

The SGA desires to work more closely with the AFRPA and the regulatory agencies to ensure that the McClellan effort does not become a repeat of the Aerojet scenario, and to ensure that adequate measures are in place to make full clean-up of contaminated groundwater. Three of McClellan’s four surrounding water purveyors have already been affected by contamination. In the 1990s, domestic water supply wells in the community of Rio Linda, northwest of the Base, were shut down due to the presence of contaminants. The City of Sacramento has lost two of its public water supply wells outside the southwest boundary of the Base. The Sacramento Suburban Water District, which supplies water along the southeast and east side of the Base, has voluntarily placed some of its wells on standby status due to their proximity to McClellan. Clearly, any proposed remediation strategy must take into account the present and future plans of the local water purveyors as well as potential regional impacts, and must ensure our ability to implement and comply with the historic Water Forum Agreement.

SGA appreciates your consideration of these comments. We believe that it would be detrimental to the region if the AFRPA were to back away from its responsibility to fully remediate this contamination. The AFRPA’s remediation plan must ensure that the basin’s water supply is available for the benefit of future generations; the recent “containment” proposal falls short of that goal. We are open and available to work with the AFRPA on future plans, as we believe that the most effective solutions can be reached through a coordinated effort. We suggest that the Air Force work with and solicit input directly from the SGA and affected local purveyors in the development of a final remediation plan.

Please feel free to contact me directly at (916) 967-7692 if you need any additional information.

Sincerely



Edward D. Winkler
Executive Director

cc: Senator Dianne Feinstein
Senator Barbara Boxer
Congressman John Doolittle
Congressman Dan Lungren
Congresswoman Doris Matsui
Senator Dave Cox
Senator Deborah Ortiz
Assemblymember Roger Niello
Sandy Sheedy, Sacramento City Council, District 2
Steve Cohn, Sacramento City Council, District 3
Roger Dickinson, Sacramento County Supervisor, District 1
Illa Collin, Sacramento County Supervisor, District 2
Susan Peters, Sacramento County Supervisor, District 3
Roberta MacGlashan, Sacramento County Supervisor, District 4
Lester Snow, Director, Department of Water Resources
Celeste Cantu, Executive Director, State Water Resources Control Board
Paul Hahn, Director, County of Sacramento Economic Development Department
Kathryn Halvorson, Director, Air Force Real Property Agency
Paul Brunner, BRAC Environmental Coordinator, Air Force Real Property Agency
Keith Takata, Director, Superfund Division, Environmental Protection Agency
Kathleen Johnson, Chief, Federal Facilities & Clean Up Branch, Environmental Protection Agency
Sheryl Lauth, Chief, Federal Facilities Section 1, Environmental Protection Agency
Martin Zeleznik, Environmental Engineer, Environmental Protection Agency
Kevin Depies, Engineering Geologist, Department of Toxic Substances Control
Tom Pinkos, Executive Officer, Central Valley Regional Water Quality Control Board
Antonia Vorster, Supervising Engineer, Central Valley Regional Water Quality Control Board
James Taylor, Engineering Geologist, Central Valley Regional Water Quality Control Board
Sandra Shewry, Director, Department of Health Services
Carl Lischeske, Chief, Department of Health Services
Terry Macaulay, Engineer, Department of Health Services
SGA Board of Directors
SGA Contamination Strategy Committee
Steve Hall, Executive Director, Association of California Water Agencies
Leo Winternitz, Executive Director, Sacramento Water Forum



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Edward D. Winkler
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August 3, 2004

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Sacramento Suburban
 Water District

San Juan
 Water District

Southern California
 Water Company

Agricultural and
 Self-Supplied
 Representative

Mr. Brian Sytsma
 ARPA/DD
 3411 Olson Street
 McClellan, CA 95652

Dear Mr. Sytsma:

The Sacramento Groundwater Authority (SGA) appreciates the opportunity to comment on your proposed plan for cleanup of VOCs in groundwater. The SGA is a joint powers authority formed in 1998 to manage the groundwater basin underlying Sacramento County north of the American River. SGA members include all 14 established water purveyors in northern Sacramento County. Groundwater comprises approximately 50% of the developed municipal supply for the more 500,000 residents living within the SGA area, making this one of our most critical natural resources in the region.

In response to the proposed plan, we have the following concerns:

1. Assumptions regarding current and future groundwater levels may not be accurate. For example, it is not clear from your document whether or not the cleanup plans have taken into account the Water Forum Agreement (WFA) executed in 2000 by 40 local utilities, business leaders, environmental and local community representatives. The WFA promotes a regional-scale conjunctive use program. This program involves various partnerships among and between SGA members to facilitate delivery of surface water into the interior of the basin in wet years. Those same purveyors will rely more heavily on the basin in drier years, resulting in a cyclical operation of the basin. The net result, however, will be to stabilize or elevate groundwater levels. The potential for elevated groundwater levels does not appear to be contemplated in your plan.
2. Given the purveyors' reliance on the basin for storage and supply to meet the WFA and other commitments, we are concerned that VOC's and other contaminants from McClellan could interfere with or restrict purveyor water operations in the future. We are not aware of any plans to mitigate such impacts.

3. We are concerned about the lack of coordination between McClellan, potentially affected purveyors, and SGA. Given the nature of the problems at the site and potential impacts to water purveyors, we suggest that a workgroup be formed to discuss these issues and to explore mutually beneficial solutions.

Please feel free to contact me at (916) 967-7692, if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "E D Winkler". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Edward D. Winkler
Executive Director

cc: Ron Bachman, SGA Chair
Leo Winternitz, Water Forum