



San Gabriel Basin Water Quality Authority

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December 3, 2015

Joe Karkoski, P.E., PMP
Supervising WRCE
State Water Resources Control Board
Department of Financial Assistance, Bond Section
1001 I Street, 16th Floor
Sacramento, CA 95814

RE: Comments on Proposition 1 Groundwater Sustainability Program
Proposed Scope of Guidelines

Dear Mr. Karkoski:

The San Gabriel Basin Water Quality Authority (“WQA”) is a special district agency created by the Legislature to oversee the groundwater cleanup in the Main San Gabriel Basin. The groundwater basin provides drinking water to 1.4M residents of the San Gabriel Valley and its surrounding communities. We appreciate the opportunity to comment on the Department of Financial Assistance’s (DFA) November 2015 presentation of the proposed scope of the Proposition 1 Groundwater Sustainability Program guidelines.

Treatment and Remediation Activities

Sections 79772 and 79771(c) both use the language “treatment and remediation activities” to describe the types of activities to be funded under these sections that include the costs associated with the treatment and remediation of groundwater contamination. During DFA’s November 20, 2015 scoping meeting at the Los Angeles Regional Water Quality Control Board we noted staff’s comments that with the exception of limited start-up costs, general remedial project operation and maintenance costs would not be funded under Section 79772. However, DFA staff noted that these costs would be allowed under Section 79771(c). It is important for SWRCB staff to understand the years and effort that the San Gabriel Valley Legislative Caucus

put into writing the above-referenced language that ultimately found its way into what became Proposition 1. Particular attention was paid to the disadvantaged communities that are required to pay for orphan and other unfunded cleanup liabilities through assessments imposed by the WQA. To now suggest that the traditional application of capital project-only review to the use of the monies would be to countermand the letter and spirit of the language in question. In fact, while the Legislature made numerous references to “projects” in AB 1471 of 2014 that became Proposition 1, it carefully chose other more expansive language in other sections. A good example is the \$510 million allocated to grants to the hydrologic basins. In that instance the Legislature opened up the permissible expenditure parameters as follows:

B. \$100 million shall be available for direct expenditures, and for grants and loans, for specified water conservation and water-use efficiency plans, projects, and programs.

Similarly in Proposition 84, the Legislature authorized the use of bond funds for activities necessary to provide safe drinking water to adversely impacted Californians. An excerpt from Chapter 2 of Proposition 84 of 2006 is as follows:

75021. (a) The sum of ten million dollars (\$10,000,000) shall be available to the Department of Health Services for grants and direct expenditures to fund emergency and urgent actions to ensure that safe drinking water supplies are available to all Californians.

Our point is simply this: the Legislature reserves the right to provide different funding direction to the agencies when the public health, safety, and the environment pose unique challenges. Just as is the case with the two examples cited above, the Legislature intended that remedial action treatment activities in furtherance of public health goals be eligible for priority funding. The SWRCB, with its more expansive water quality and public health regulatory portfolio, should quickly embrace the funding opportunities now made available by the people for groundwater cleanup.

To that end, the San Gabriel Valley Legislative Caucus said in its very early letter to an initial group of Proposition 1 public agency negotiators the following:

A Legacy That Must be Remediated to Bolster Local Supplies Consistent with State Policy

The WQA and its member agencies and others are cleaning up a 50-year legacy of contaminated groundwater while creating expanded regional water supplies. Water bond funding is urgently needed in the San Gabriel Valley given the breadth, urgency, and gravity of the contamination. We urge you to join us in aggressively pursuing a precedent-setting effort to

establish groundwater cleanup and recycling funding as a convergent public health, environmental justice, local water supply, and environmental enhancement priority.

Fortunately, the stakeholders, negotiators, the Legislature, and the people of California embraced this perspective and funded it accordingly. We ask that you join in this unique historic opportunity to advance groundwater cleanup in partnership with the WQA and your State and federal partners.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Manning', with a large, sweeping flourish extending to the right.

Kenneth R. Manning
Executive Director

Cc: San Gabriel Valley Legislative Caucus
Hon. Felicia Marcus
Mr. Tom Howard
The Gualco Group, Inc.
Mr. Gabriel Monares



December 4, 2015

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Water Board Groundwater Quality Funding Program Staff
State Water Resources Control Board
P.O. Box 100 Sacramento, CA 95812-0100

SUBJECT: Comments on the Proposition 1 Groundwater Sustainability Program Staff Discussion Document/Proposed Scope – November 2015

Dear Sir or Madam:

Thank you for the opportunity to comment on the Proposition 1 Groundwater Sustainability Program Staff Discussion Document/Proposed Scope – November 2015. These comments are made by the Santa Ynez River Water Conservation District, ID#1. The District is a public water agency in Santa Barbara County with a naturally occurring Chromium 6 contamination issue.

In the Background section of the subject document it is noted that Assembly Bill 1471, Chapter 10 Sections 79770-79744 make \$800 million available for grants AND LOANS for projects. We are curious why the Program has elected to offer grants only. We believe that asking affected parties to look elsewhere for other programs, often having different rules and requirements is a significant impediment to the Program goals.

Proposed Funding Process: Bullet 2 states that initial staff review will identify whether the “best” funding fit for the proposed project is the Prop 1 Groundwater Sustainability program; Site Cleanup Subaccount Program; or the Drinking Water State Revolving Fund (SRF). As noted, these programs are being administered by different units in DFA. As such, they are being designed independently with no oversight as to compatibility between programs. Sending a naturally occurring contaminant project over to the Drinking Water SRF Program is not an equitable move. The Drinking Water SRF Program has completely different rules and requirements, not the least of which is that the Program will only provide grants to DACs. Even if a District such as ours would have to double the cost of service to its customers, the Drinking Water SRF Program will only offer loan support.

Under General Decision Rules to Identify “Best” Funding Fit, it is stated that Projects that are primarily drinking water treatment projects (i.e., treatment of natural contaminants or contaminants that are not amenable to source cleanup) will be administered through the Drinking Water SRF. Assembly Bill 1471, Chapter 10 Section 79773 specifically includes several naturally occurring contaminants in its list of contaminants to be addressed with funding. No mention is made as to whether or not the contaminants are amenable to source cleanup. Since it is widely known that naturally occurring contaminants such as Chromium 6, uranium, bromide, iron, manganese, etc. cannot be removed from the sources, it follows that the chapter is intended to include wellhead treatment and other technologies to return these sources to use as drinking water resources.

Eligible Projects: As stated, both planning and implementation projects will be recognized and funded. What are the plans for supporting planning and implementation expenditures that have or will take place before the Program is ready to approve and fund projects?

Project types Identified: Bullet 4 again states that drinking water projects will “generally be administered through the Drinking Water SRF Program.” Section 79771 specifically includes “projects necessary to protect public health by...reducing contamination in groundwater that serves or has served as a major source of drinking water for a community.” We do not believe that sending drinking water projects that try to reduce naturally occurring contaminants to the Drinking Water SRF program is in keeping with the intent of the Bill.

Thank you for taking these comments under consideration.

Sincerely,



Eric Tambini
Water Resources Manager

cc: Chris Dahlstrom, General Manager
William J. Brennan, Water Systems Consultant

Los Angeles



Department of Water & Power

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MARCIE L. EDWARDS
General Manager

December 4, 2015

Ms. Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

Dear Chair Marcus:

Subject: Proposition 1 (Prop 1) Chapter 10 Groundwater Sustainability Funding
Program Scoping Questions

The Los Angeles Department of Water and Power (LADWP) would like to express appreciation to the State Water Resources Control Board (SWRCB) and its staff for the continued development of the Groundwater Sustainability Funding Program (GSFP) in an open, thoughtful, and expedient manner. The \$800 million provided in Prop 1, Chapter 10, for prevention and cleanup of groundwater contamination is an important source of funding to protect and ensure the availability of valuable local groundwater resources for drinking water supply.

The City of Los Angeles (City) is in the process of reducing its reliance on imported water supplies. This effort consists of a number of strategies, including projects to recharge and restore the full use of the City's groundwater basins as a source of water consistent with water rights and historic groundwater use. These efforts have become increasingly critical as California endures multi-year dry conditions and as climate change threatens to permanently alter California's hydrologic patterns.

On September 11, 2015, LADWP submitted a pre-application for \$317 million in GSFP funding for the San Fernando Groundwater Basin (SFB) Remediation Project (Project), which is the linchpin to the City's efforts to develop local water resources. On November 20, 2015, LADWP staff attended the GSFP Proposed Scope of Guidelines Meeting held in Los Angeles. LADWP's comments based on discussion at the November 20 meeting and the Staff Discussion Document/Proposed Scope dated November 2015 (Discussion Document) are provided below.

Los Angeles Aqueduct Centennial Celebrating 100 Years of Water 1913-2013

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Telephone: (213) 367-4211 www.LADWP.com

Grant Agreement

The Discussion Document describes a process to complete a Grant Agreement that includes the determination of the status of California Environmental Quality Act (CEQA) documentation, not the submittal of final CEQA documents. LADWP supports this approach, which acknowledges the difference between groundwater investigation and remediation projects, and typical capital projects. This approach will help staff encumber funds in a timely manner and limit delays in project expenditures.

Funding Cycle

The Discussion Document provides parameters for encumbrance and liquidation included in the appropriation for GSFP in the Budget Act of 2015: encumbrance by June 30, 2018, and liquidation by June 30, 2021. The Discussion Document also indicates that "project selection in the initial rounds will be based on the ability to meet those respective deadlines."

LADWP understands SWRCB's wish to allocate funding in accordance with budget deadlines, but believes the ability to meet these deadlines should not be the sole basis for selection and award during initial rounds of funding. Large, complex projects that will provide significant regional and statewide benefits will require longer associated timeframes for completion. As such, LADWP encourages SWRCB to focus on prioritization criteria outlined in Prop 1 (Water Code Section 79771 (b)) when selecting projects for award.

LADWP requests that SWRCB develop a process for extending budget or funding agreement deadlines for projects that have experienced reasonable delays. Project proponents should be responsible for maintaining constant communication with SWRCB's Division of Financial Assistance and Division of Drinking Water, along with all other pertinent regulatory agencies, regarding projects' progress and any challenges that may arise. However, timely completion of large complex projects, such as the SFB Project, will rely on a number of factors, including permit considerations, which cannot always be predicted or controlled. Providing an extension process that recognizes such contingencies would help ensure the highest impact projects qualify for and receive funding.

Finally, LADWP also requests clarification as to how these budget deadlines would apply to subsequent rounds of funding, given that the appropriation in the Budget Act of 2015 encompassed the entire amount authorized by Prop 1. Without a deadline extension process in place, subsequent rounds of funding would require decreasing

timeframes for project completion, which would impact the types of projects that could receive and utilize funding.

Funding Match

The Discussion Document does not include detailed requirements for the 50 percent matching funds provided by project proponents who are awarded GSFP funding. However, at the November 20 meeting, SWRCB staff indicated that the earliest date for matching funds to have been incurred is November 2014, the voter approval date for Prop 1.

LADWP requests that SWRCB allow matching funds that pre-date Prop 1 approval. In order to develop a long-term solution to contamination in the SFB, LADWP invested \$33.5 million between 2009 and 2015 in the Groundwater System Improvement Study (GSIS). GSIS updated the 1992 Remedial Investigation for the SFB by installing and sampling 26 new monitoring wells, identifying and evaluating contaminants, and collecting 70,000 new data points. GSIS was a necessary step in development of SFB remediation plans for which LADWP is now seeking GSFP funding. New data obtained through LADWP's characterization efforts have provided regional benefits to other agencies to better understand contamination in the SFB, including the Environmental Protection Agency, Upper Los Angeles River Area Watermaster, and potentially responsible parties in the area. Therefore, LADWP believes that these expenditures are direct project expenditures and should qualify as matching funds.

Post-project Cost Recovery/Responsible Party (RP) Search

The Discussion Document indicates that costs for RP searches and cost recovery efforts will be eligible for grants or matching funds up to a specified percentage of total project cost.

LADWP supports this proposed provision, as activities to investigate and pursue RPs can be cost intensive. For example, the City has spent over \$3 million to date on identifying RPs and investigating the extent to which they caused and/or contributed to contamination in the SFB.

In addition, at the November 20 meeting, SWRCB staff expressed an understanding that identification and pursuit of RPs can take years and may extend well beyond the timeframe of GSFP agreements with project proponents. As a result, staff is proposing that funds recovered from RPs could be applied towards other treatment and remediation activities, such as operation and maintenance.

Ms. Felicia Marcus, Chair
Page 4
December 4, 2015

LADWP supports this proposal because SFB remediation costs are not expected to be fully covered by RPs. Contamination in the SFB was most likely caused by improper storage, handling, and disposal of hazardous chemicals used in the aircraft manufacturing industry, as well as commercial and heavy industrial activities, dating back to the 1940s. LADWP expects that many businesses responsible for the contamination no longer exist, and many of their previous owners would not be able to significantly support the expected cost of remediation.

GSFP funding would help alleviate the cost impacts of remediation for many low-income residents. In fact, the City has qualified as a disadvantaged community for funding from the Safe Drinking Water State Revolving Fund in two of the last six years.

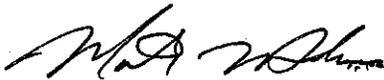
Projects vs. Programs

LADWP supports the flexibility outlined in the Discussion Document related to funding of "programs," composed of multiple projects. This approach acknowledges the wide range of projects that could qualify for GSFP awards.

The SFB Project includes multiple groundwater treatment systems that are inextricably linked to meet the objective of remediating the SFB by removing contamination and restoring and maintaining beneficial uses. Development and implementation of the SFB Project will be an extended, complex process. LADWP looks forward to working with SWRCB to determine the most appropriate funding approach to support the objectives in the SFB.

On behalf of LADWP, I thank SWRCB and its staff for the critical progress being made on the development of GSFP. Please contact me at (213) 367-1022, if you have any questions or comments.

Sincerely,



Martin L. Adams
Senior Assistant General Manager – Water System

SB:yrq

c: Joe Karkoski - SWRCB
Robert Reeves - SWRCB



FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

File 160.8372

December 3, 2015

State Water Resources Control Board
Proposition 1 Groundwater Sustainability Grant Program
Division of Financial Assistance
P.O. Box 944212
Sacramento, CA 94244-2120

Subject: Comments on the Proposed Scope of the Proposition 1 Groundwater Sustainability Program Guidelines

The Fresno Metropolitan Flood Control District (District) appreciates the opportunity to submit comments on the State Water Resources Control Board's 'Proposition 1 Groundwater Sustainability Program Proposed Scope – November 2015'. Comments are presented in the order the sections appear in the Proposed Scope document.

There is overlap in groundwater quality objectives between the two grant programs identified in the Proposed Scope, SB 445 (Hill, 2014) Underground storage tanks: hazardous substances: petroleum: groundwater and surface water contamination, and Chapter 10 of Proposition 1 Water Quality, Supply, and Infrastructure Improvement Act of 2014. However, it appears that Chapter 10 of Prop. 1 is much broader in its inclusion of grant program goals than SB 445's narrow and specific focus on groundwater contamination clean-up. The preferences of the Proposed Scope seems to be more consistent with SB 445's narrow focus, and exclude projects that could be included, based on language found in Chapter 10 of Prop. 1. The Prop. 1 Groundwater Sustainability Grant Program should be broadened to include projects that fit with all of the criteria identified in the Chapter 10 of the bill's language.

In the California Water Action Plan (CWAP), the foundational document of Prop. 1, groundwater recharge is identified as an important tool in preserving the quality and quantity of California's groundwater. As stated on page 7 of the CWAP, under item 6. Expand Water Storage Capacity and Improve Groundwater Management, "Moreover, we must better manage our groundwater basins to reverse alarming declines in groundwater levels. Continued declines in groundwater levels could lead to irreversible land subsidence, poor water quality, reduced surface flows, ecosystem impacts, and permanent loss of capacity to store water as groundwater." It is the District's assertion that the CWAP, Chapter 10 of Prop. 1, and the Proposed Scope of the Prop. 1 Groundwater Sustainability Program would be in agreement if the Proposed Scope recognized groundwater recharge as a tool to prevent groundwater contamination.

Program Preferences (found on page 3 of the Proposed Scope)

Prop. 1 Groundwater Sustainability Program preferences listed in the Proposed Scope should be expanded to encompass projects that prevent groundwater contamination, as described in Prop. 1, Chapter 10's criteria (b)(3) and (b)(4) under §79771:

- (3) The potential of the project, if fully implemented, to enhance local water supply reliability.
- (4) The potential of the project to maximize opportunities to recharge vulnerable, high-use groundwater basins and optimize groundwater supplies.

Recognizing groundwater recharge as an important tool to prevent groundwater contamination, as it is recognized in the CWAP, would increase the number of quality projects that could be funded with the \$800,000,000 in Prop. 1 funds that SWRCB is tasked to encumber by June 30, 2018. Given that Chapter 10 Groundwater Sustainability, is the only chapter in Prop. 1 that is specifically dedicated to groundwater, it would be appropriate to broaden the Proposed Scope to allow funding of projects that increase groundwater recharge to prevent groundwater contamination, among other project benefits. Groundwater supply is inextricably linked to groundwater quality.

In addition to meeting the Prop. 1 criteria listed above, inclusion of groundwater recharge projects for groundwater contamination prevention aligns with groundwater management tasks listed in Prop. 1 §79770, "Prevention and cleanup of groundwater contamination are critical components of successful groundwater management. Groundwater quality becomes especially important as water providers do the following:

- (a) Evaluate investments in groundwater recharge with surface water, stormwater, recycled water, and other conjunctive use projects that augment local groundwater supplies to improve regional water self-reliance.
- (b) Adapt to changing hydrologic conditions brought on by climate change.
- (c) Consider developing groundwater basins to provide much needed local storage options to accommodate hydrologic and regulatory variability in the state's water delivery system.
- (d) Evaluate investments in groundwater recovery projects."

Implementation (found on page 4 of the Proposed Scope)

As described in this section of the Proposed Scope, "Implementation projects include, but are not limited to, design, construction, pilot studies, and initial startup of facilities that prevent or clean up the contamination of groundwater that serves or has served as a source of drinking water."

State Water Resources Control Board
December 3, 2015
Page 3

The mention here of projects that prevent the contamination of groundwater should be reflected in the types of projects funded by SWRCB, and should be considered to include projects that augment local agencies' ability to perform groundwater recharge. From the perspective of the Fresno Metropolitan Flood Control District (District) this is a wholly appropriate use of Prop. 1 Groundwater Sustainability Program grant funds. The District's 399-square mile service area is located in the Kings Sub-Basin, which is classified by the State of California as being in a serious condition of groundwater overdraft.

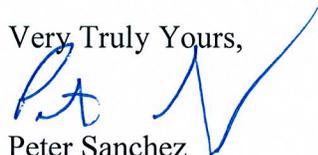
Project types identified (found on page 5 of the Proposed Scope)

At present, the four bulleted project types listed in the Proposed Scope are all devoted to groundwater contamination clean-up and do not address prevention of groundwater contamination, mentioned as a 'Program Preference' earlier in the Scope. Project types should be expanded to include projects that use groundwater recharge as a tool for preventing contamination of groundwater. Examples are listed below, most of which are included in the District's pre-application submitted on October 13, 2015.

- Construction of recharge interties between irrigation canals and stormwater retention/recharge basins.
- Construction of pump stations, outfalls, and pipelines to facilitate movement of water for the purpose of groundwater recharge.
- Construction of reclaimed pumps for converting existing irrigation systems' water source from potable water to on-site surface water.
- Acquisition of retention/recharge basins or potential retention/recharge basin sites.
- Excavation of retention/recharge basins.
- Construction of gravity drains to increase groundwater percolation rates.

Thank you again for the opportunity to submit comments on the SWRCB's Proposed Scope of the Prop. 1 Groundwater Sustainability Grant Program. Please contact Brandy Swisher, Staff Analyst with the District, at (559) 456-3292 or brandys@fresnofloodcontrol.org, should you require additional information.

Very Truly Yours,



Peter Sanchez
District Engineer

PS/BS/sy

c: John Santos, Engineer, FMFCD
Brandy Swisher, Staff Analyst, FMFCD

Comments WATERBOARDS Prop 1 Groundwater Sustainability due 12.4.2015

Please clearly define uses such as Multi-benefit.

Public Benefit is questionable.

We are concerned that the bidding process is being bypassed by awards to non-profit corporations. Conflict of interest issues can arise and have not been addressed in the grant awarding process.

Groundwater is owned by a person, company, agency, government or water company. Site control is an issue especially is the site control is obtained after grant approval. As a sample we are attaching Council Files as examples of lack of real site control and ability for operations and maintenance, under the Proposition 84 Grant Awards:

- Prop 84 Program CF 09-2839
- LA Parks Foundation CF 10-1133
- Trust for Public Land CF 13-0135
- Trust for Public Land CF 13-0135-S1
- Trust for Public Land Contract C-117818 Amendment
- LANI Los Angeles Neighborhood Initiative CF12-1406-S1
- LANLT LA Neighborhood Land Trust CF 12-1406-S2
- MRCA CF 12-1406-S3
- MRCA CF 15-1008
- Heal the Bay CF 14-1457-S1

Donations of public money aka the grant award completed product is being given. We question the legality of donations of public money and ask that this not be allowed for Proposition 1 funding.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

Attachments:

- 01 Prop 84 Program CF 09-2839
- 02 LA Parks Foundation CF 10-1133
- 03 Trust for Public Land CF 13-0135
- 04 Trust for Public Land CF 13-0135-S1
- 05 Trust for Public Land Contract C-117818 Amendment
- 06 LANI Los Angeles Neighborhood Initiative CF 12-1406-S1
- 07 LANLT LA Neighborhood Land Trust CF 12-1406-S2
- 08 MRCA CF 12-1406-S3

09 MRCA CF 15-1008

10 Heal the Bay CF 14-1457-S1



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GRACE ROBINSON HYDE
Chief Engineer and General Manager

December 4, 2015

Via Electronic Mail

State Water Resources Control Board
Division of Financial Assistance
Proposition 1 Groundwater Sustainability Funding Programs

To Whom It May Concern:

Proposition 1 Groundwater Sustainability Funding Programs -- Scoping Comments

On behalf of the Santa Clarita Valley Sanitation District (District), thank you for the opportunity to submit comments regarding the State Water Resources Control Board's Proposition 1 Groundwater Sustainability Funding Programs. The District provides wastewater treatment services to the City of Santa Clarita and unincorporated areas of Los Angeles County in the Santa Clarita Valley. The District owns and operates the Valencia and Saugus Water Reclamation Plants, which provide tertiary treatment to produce high-quality recycled water that is reused or discharged to the Upper Santa Clara River. To comply with the Upper Santa Clara River Chloride Total Maximum Daily Load, the District must implement a set of projects that include installation of ultraviolet disinfection and microfiltration/reverse osmosis treatment facilities. In addition to ensuring compliance with surface water quality standards for chloride in the Santa Clara River, these treatment improvements are also intended to protect local as well as downgradient groundwater basins, which together provide at least half of the drinking water supply for a population of approximately 250,000. The project will have supplemental surface and groundwater water quality benefits associated with reductions of other pollutants, such as trihalomethanes and N-nitrosodimethylamine (NDMA).

The purpose of this letter is to recommend that the Proposition 1 Groundwater Sustainability Funding Programs include as a high priority projects that will prevent contamination of groundwater. As stated in the Staff Discussion Document, Chapter 10, Groundwater Sustainability (Sections 79770-79744 of the California Water Code) makes \$800 million available for grants and loans for projects *to prevent* or clean up the contamination of groundwater that serves or has served as a source of drinking water. However, in the section of the Staff Discussion Document that describes the types of projects that have been identified, all of these project types appear to fall broadly into the category of projects that will clean up contamination, and do not really include any categories aimed at preventing contamination in the first place. While we understand the importance of providing funding for cleanup projects, we

believe that Proposition 1 requires that projects to prevent groundwater contamination from occurring also be eligible for funding. This appears to be a major omission from the Water Board's current thinking regarding the content of the guidelines for Chapter 10 Groundwater Sustainability funding.

In Southern California as well as elsewhere in California, in soft-bottom streams, there is often a surface water-groundwater connection, which is recognized in Regional Water Quality Control Plans (i.e. "Basin Plans") through designation of the Groundwater Recharge (GWR) beneficial use. Projects that improve surface water quality where the GWR use occurs also protect groundwater basins, and this benefit should be both recognized and incentivized through eligibility under the Proposition 1 Groundwater Sustainability Funding Program. Most groundwater basins in or near urban areas in Southern California are used for drinking water purposes, and, if not contaminated, are usually vulnerable to potential contamination. Thus, we support several of the proposed priorities mentioned in the Staff Discussion Draft, including potential of project to recharge vulnerable, high-use basins, and potential of project to enhance local water supply reliability. In terms of the contaminants that should be prioritized, we strongly recommend that N-nitrosodimethylamine, trihalomethanes, haloacetic acids, salts and nutrients all be considered high priority for funding awarded under the Groundwater Sustainability Funding Programs, some of which are in addition to the contaminants specifically listed in Section 79773 of the Public Resources Code (Proposition 1). (*see* Public Policy Institute of California, "California's Water Quality Challenges," (Oct. 2015))

Thank you for the opportunity to comment on the scope of the Groundwater Sustainability Funding Programs. We look forward to reviewing the draft funding guidelines.

Very truly yours,



Sharon Green
Legislative and Regulatory Liaison
Technical Services Department

SNG:djm