



Western Placer County Groundwater Management Plan Partners

December 18, 2013

VIA E-MAIL ONLY

Mr. Eric Oppenheimer
Division Chief
Office of Research, Planning, and Performance
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814

SUBJECT: Comments to Discussion Draft Groundwater Workplan Concept Paper

Dear Mr. Oppenheimer,

Western Placer County Groundwater Management Plan (WPCGMP) Partners, California American Water, the City of Lincoln, Placer County Water Agency, and the City of Roseville, collectively referred to as Partners, appreciate the opportunity to submit comments on the State Water Resources Control Board's (SWRCB's) Groundwater Workplan Concept Paper (Concept Paper). This letter is submitted on behalf of the agencies and provides a brief background of the WPCGMP in addition to the comments below. Italicized statements from the Concept Paper are listed and the Partners' comments follow immediately within each management element. Potential Water Board Actions and recommendations options to others are not specifically listed or commented on, but are generally discussed within each management action.

WPCGMP Partnership Background and Accomplishments

The Western Placer County Groundwater Management Plan was adopted in November 2007 by the partnership agencies listed above. The WPCGMP is a planning tool to assist the Partners in an effort to maintain a safe, sustainable, and high-quality groundwater resource within a portion of the North American River Groundwater Subbasin (Subbasin). The goal of the WPCGMP is to maintain the quality and ensure the long-term availability of groundwater to meet backup, emergency, and peak demands without adversely affecting other groundwater uses (domestic and agricultural) within the WPCGMP area. The Partnership meets on a regular basis and works closely with other agencies in the surrounding region.

The Subbasin underlies portions of Sutter, Placer, and Sacramento counties and is being managed by three separate entities: the Sacramento Groundwater Association (SGA), South Sutter Water District (SSWD), and the WPCGMP Partners. To increase stakeholder involvement, the Partner have reached out and is now receiving input from Placer County and South Sutter Water District. The Partners are also coordinating with SGA on regional issues and groundwater management projects.

The Partners have taken a methodical approach to managing the Subbasin given the constraints of self-funded budgets. We have proceeded in a logical manner to obtain high

quality data with which to make informed management decisions. This has included developing a dedicated groundwater monitoring network, updating a groundwater flow model, development of a sustainable yield estimate, preparation of a Biennial State of the Basin Report, and having open public meetings to discuss the findings and establish a fact-based common level of understanding. In 2014, the Partners will better define groundwater recharge areas, assess groundwater/surface water interactions, assess whether recharge basins may be possible, and further the protection of water quality. The work completed to date has been voluntary without State governance and enforcement.

General Comments to the Concept Paper

This concept paper is a good initial starting point to begin discussions with concerned stakeholders. We recognize there is a long road ahead in developing the concepts presented and look forward to be a part of the planning process. We would look to define further some concepts discussed. For example, there are references to “high-use basins” in the Concept Paper. A definition of a “high-use” basin as well as identification of these basins is necessary. The Partners are not aware of any definition or previously defined basins within the State as “high-use” groundwater basins. It would also be beneficial to know whether groundwater management plans or programs exist in these basins. It is unclear whether a future groundwater workplan would only address high-use basins without groundwater management plans or all basins.

Thresholds

Concept Paper Statement: The State Water Board is soliciting comments on whether the current and proposed action will result in thresholds for groundwater quality and elevation that support assessment of groundwater conditions, evaluation of groundwater quality and quality trends and informed management decisions.

Establishing thresholds for groundwater quality or quantity is an enormous task requiring a thorough hydrogeologic understanding of a subbasin, defining aquifers and their relationships, sorting through monitoring wells to assess relevant and comparable data, and collecting long-term data to develop trends. Water quality thresholds may be more readily developed based on current anti-degradation policies and beneficial uses. However, thresholds for groundwater quantity would be difficult to develop due to existing and potential uses and quantities needed by local communities and their policies, lack of pump metering and records keeping, and technical expertise and resources required in developing, implementing, and monitoring of such thresholds.

While providing authority for local groundwater management entities to establish thresholds for sustainable groundwater management is a better management action than state or federal agencies, the Partnership recommends such thresholds be evaluated by local groundwater management entities rather than a global requirement mandated by the Legislature.

Monitoring and Assessment

Concept Paper Statement: The State Water Board is interested in understanding whether the existing and proposed action will result in better integration and accessibility of existing groundwater quality and quantity data to support assessment of groundwater conditions, evaluation of groundwater quality and quantity trends and informed management decisions.

The WPCGMP Partners agree with the Concept Paper that monitoring is necessary to manage groundwater. Currently, the California Statewide Groundwater Elevation Monitoring (CASGEM) program established by 2009's SB 6 requires each basin be monitored. The CASGEM database is sufficient for integration of water levels. It would be more effective to have the CASGEM website expanded to accommodate water quality data rather than having the data stored in a separate website. By doing so, water quality data would be available on the same website as the well construction details, which for data analysis is more useful. However, not all water quality data should reside in CASGEM. Projects involving contamination and remedial actions that could affect both groundwater level and quality need to be evaluated based on individual site's specific conditions and activities.

Governance and Management

Concept Paper Statement: The State Water Board is interested in understanding whether the existing and potential actions in this section will result in the sustainable management of groundwater quality and quantity in high-use basins.

It is clear that more interest has been placed on groundwater management in recent years as groundwater has become a valuable resource in meeting the water demands of California's increasing population. As demonstrated by AB 3030, SB 1938, Integrated Regional Water Management Plan (IRWMP) initiative, and the draft California Water Action Plan, locally controlled groundwater management is the proven management tool for groundwater. Local understanding and expertise is necessary to respond to the variability in groundwater basins. Communities relying on groundwater would immediately notice changes, address problems, and collaborate on regional solutions. Management decisions would also be based on understanding of future water resources use in the area.

The Western Placer County Groundwater Management Plan, an AB3030 and an SB1938 compliance plan was developed and implemented voluntarily by the Partners. There are other local groundwater management initiatives and entities that have been established based on local needs in response to groundwater use or water quality. To be successful in this venture, the Partners feel the SWRCB and the Legislature should encourage and support local authority and initiatives to strengthen local groundwater management rather than institute a state mandate for a "one size fits all" approach. Local control recognizes the uniqueness of each groundwater basin.

Funding

Concept Paper Statement: Please refer to the existing and potential action in commenting on whether adequate funding will be available to implement the suggest management framework (developing thresholds, conducting monitoring and assessment, managing and controlling groundwater quality and quantity and oversight/enforcement).

The WPCGMP is locally funded, but the cost of the program must provide benefit to each of the Partner's communities. There are limits as to how much each Partner is able to contribute. As pointed out in the Concept Paper, funding for local groundwater management agencies by imposing fees would be a significant obstacle. It would be prudent for the SWRCB to provide financial assistance, in addition to those provided to Disadvantaged Communities, for continued groundwater management actions, especially for future mandates that have not yet been accomplished. Funding for long-term management should be identified. For instance, as the AB3030 groundwater management program evolved, the Department of Water Resources

(DWR) found that providing financial incentives greatly increased local groundwater management cooperation and involvement.

Oversight and Enforcement

Concept Paper Statement: The State Water Board, along with the Department of Water Resources and the California Department of Fish and Wildlife, can exercise, in varying degrees, constitutional and statutory authorities to protect the public trust, prevent the waste and unreasonable use of the State's water resources, and initiate actions to protect those resources. In addition to the actions suggested below, the State Water Board is soliciting input on whether these authorities should be integrated into its workplan for groundwater.

The Partners fully support an integrated approach by the SWRCB and other agencies in developing groundwater management strategies in overdraft basins without local management entities. DWR is engaged with local groundwater management entities and has provided valuable assistance and funding to local groundwater management entities, including the WPCGMP. The process has worked well and we welcome more assistance and funding from DWR. We also fully support the Board's intent to target existing groundwater quality enforcement actions on legacy sites in hydrogeologically vulnerable areas.

Thank you for considering our comments and for the opportunity to participate in this critical groundwater management action. Please inform us of every opportunity for comment or participation in the future regarding SWRCB's action on groundwater management. Please do not hesitate to contact me at 916.746.1703 or clee@roseville.ca.us should you have any questions regarding this letter.

Sincerely,



Cathy Lee, P.E.

Project Manager

Western Placer County Groundwater Management Plan Partners