

NORTH COAST STREAM FLOW COALITION

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December 15, 2013

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Re: Comments on the State Water Resources Control Board's Groundwater Work Plan Concept Paper-Eric Oppenheimer; Gail Linck

Hello Eric and Gail,

The North Coast Stream Flow Coalition formed in 2009. Our member organizations span from San Francisco Bay to the Oregon boarder. We have over 34,000 members and 18 organizations represented in our Coalition. We are strong advocates for the public's right to fish, swim and recreate in our rivers and streams. Our mission is to have healthy clean flowing streams as our future depends on this.

This Work Plan Concept Paper has good objectives, and identifies many of the critical concepts and actions needed to provide Californians with a reliable water supply in a potentially drought-ridden future. The following comments suggest adding another few critical concepts that are required before the plan can actually fulfill that goal.

- The introductory statement (p. 1) notes that the objective of the Work Plan is to "address groundwater challenges that have the greatest potential to impact beneficial uses such as swimming, fishing and recreation.

One of these challenges is the potential for drawing down groundwater so far that it reduces or eliminates stream and river underflow, and thus base flow in streams. This requires recognizing the scientifically-established connection between percolating groundwater and groundwater connected to streams. This connection must be recognized for this Work Plan to have any validity. The only place where the concept comes close to being addressed is a single reference to conjunctive management, in Section 3.3 (p. 6).

See USGS Circular 1376-**Streamflow Depletion by Wells—Understanding and Managing the Effects of Groundwater Pumping on Stream flow-** By Paul M. Barlow and Stanley A.

Section 1. Regional Leadership (p. 1)

- Add the aim of maintaining groundwater and surface water resources for the benefit of humanity by supporting wildlife and natural ecosystems.

References to the objectives of management in these statements refer only to human uses, and avoid confronting the uncomfortable fact that human well-being depends on maintaining healthy ecosystems, including forests, grasslands, wetlands, and streams.

Section 2. Implementing the Vision (p. 2)

- Add a statement that protecting natural areas, especially natural recharge areas is one of the best and most reliable ways to protect groundwater quality. Identify other potential recharge areas, whether in a natural condition or not, and preserve them for that as the highest and best use of the land.

Section 3. Management Elements and Potential Actions

3.1 Sustainable Thresholds (p. 3)

- The definition of sustainability should include sustaining GW levels to support functions of natural systems and ecosystems, including natural springs and base flow levels in desert streams. For example, groundwater withdrawals for irrigating agriculture, recreation centers (water parks), and growing populations in the area between I-40 and I-15, east of Barstow, has lowered the Mojave River Valley groundwater table to such depths that sand blown from the river bed has buried houses, farms, and utility buildings. This is just one example of the extent to which human populations do rely on preserving natural systems.

3.1.1 Potential Water Board Actions (p. 4)

- The Work Plan should put equal focus on high-use basins and lesser basins even if a basin is not yet considered high-use.

3.2 Monitoring and Assessment (p. 4)

- The introductory statement should note that monitoring will be especially important where fracking techniques are used for oil and gas production, as acknowledged in Section 3.2.1 Potential Water Board Actions.
- Monitoring to assess the approach to or exceeded thresholds should be accompanied by a list of the specific actions necessary to restore groundwater abundance and composition to desired conditions, also indicating what entities perform the actions and how they are to be enforced.
- The Work Plan also needs to consider how chronic groundwater over-withdrawals at privately owned wells might be addressed, especially in areas of mixed residential and farm irrigation uses.
- Any attempt to “work with” the Division of Oil, Gas, and Geothermal Resources will be daunting, since it is dominated by the oil and gas industry. In advance of any legislative

outcome, careful consideration of steps that could protect groundwater must begin, and what to do if legislation fails to materialize must be carefully considered as well.

Section 3.2.2 Potential Actions for Others (p. 4)

- Expand the state Recordation Program and Groundwater Ambient Monitoring and Assessment (GAMA) programs to include basins where current pumping is predicted to cause critical overdraft under extended drought conditions.

3.3 Governance and Management (p. 6)

The introductory statement possesses “Managing groundwater levels ... generally requires maintaining a balance between pumping, natural depletion, and recharge at the basin scale...”

- Change the term “natural depletion” to “natural groundwater discharges,” for the following reasons:

a. Depletion (def). *The state of being depleted; exhaustion. The use or consumption of a resource, especially a natural resource, faster than it is replenished.*

b. Prior to European settlement of California, even groundwater basins in the most arid zones, including the Mojave and Colorado Deserts and the Salton trough, accumulated large groundwater volumes over time, in spite of natural discharge processes. It’s possible to conceive of natural processes that lead to local or transient depletion of some natural resources, but the natural water cycle on continental areas, absent human groundwater pumping, does not seem to produce groundwater *depletion*.

- In the next sentence, “conjunctive use” is listed as a means of achieving the balance between pumping, natural discharges, and recharge, but the term is not explained. It is imperative that this Work Plan specifically state the important role of all underground water to maintaining stream flows.

3.3 Governance and Management (p. 6-7)

- This table contains a reference to the existing Water Rights Administration, which oversees *subterranean streams and interconnected groundwater*. This is so close to recognizing the interconnectedness of all underground water, as to beckon the state to officially and explicitly recognize the reality.

3.5 Oversight and Enforcement (p. 10)

- It’s refreshing to see a strong statement identifying the Water Board’s authority to protect the public trust and public trust resources.

Thank you,

Chris Malan
NCSFC
Chair

Jane Nielson
NCSFC Advisor

Environmental Protection Information Center; Community Clean Water Institute;
Forest Unlimited; Friends of the Navarro Watershed; Friends of the Gualala;
Friends of the Eel River; Humboldt Baykeeper; Institute for Conservation
Advocacy, Research and Education; Klamath Forest Alliance; Klamath
Riverkeeper; Maacama Watershed Alliance; Willets/Outlet Creek Watershed
Group; Pacific Coast Federation of Fishermen's Associations; Institute for
Fisheries Resources; Sonoma County Water Coalition; Living Rivers Council;
Save Mark West Creek; Willits Environmental Center