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Denise J. Carter, DISTRICT V,  
CHAIR



COUNTY OF COLUSA  
BOARD OF SUPERVISORS

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(530) 458-0508  
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December 18, 2013

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

Email: [eric.oppenheimer@waterboards.ca.gov](mailto:eric.oppenheimer@waterboards.ca.gov)

Re: Groundwater Concept Paper

Dear Mr. Oppenheimer,

It was truly a pleasure to participate in the discussions regarding the State Water Resources Control Boards (Water Boards) groundwater concept paper (Concept Paper) and the recently released California Water Action Plan (Plan) at the Regional Council of Rural Counties (RCRC) offices on November 15, 2013. We appreciate the opportunity to provide comments on your Concept Paper. We offer these thoughts as your agency continues to work toward further development of the Concept Paper.

The rural agricultural counties of Colusa and Glenn encompass the largest groundwater sub-basin in the Sacramento Valley, the Colusa sub-basin, with a surface area of 918,380 acres. Water resources in these counties are often considered significant to fixing many of the water issues discussed in the Plan. Collectively, the available surface and groundwater resources are of primary importance to our communities and agriculturally-driven economies. As stated in the Concept Paper "Whether implemented at the local, regional, or State level, effective groundwater management generally requires that the following key elements be in place: Thresholds, Monitoring & Assessment, Governance & Management, Funding, and Oversight & Enforcement." Bearing these elements in mind, the following comments reflect what we believe to be essential for local and/or regional management, and issues that should be addressed broadly by the Water Boards.

The discussion of the management elements presented in the Concept Paper can be summarized to reflect the challenges our communities need to overcome to be viable: *Funding to support governance structures and the mechanisms needed for management actions oversight, and enforcement of monitoring to prevent impacts*

*before they occur to water quality and water level should be based on sound assessment.*

*Data management systems capable of determining if established thresholds are being met in high-use basins such as ours need to be integrated across the region.*

*With local and regional trend monitoring and oversight, safe and clean drinking water as well as sustainable/sufficient agricultural supplies for economic viability can be achieved over the long term.*

We recommend a realignment of funding from state programs to create baseline sustainable funding for local agencies to manage water resources. Management of these resources is best facilitated at a local level with oversight by the state if the local agency cannot or chooses not to manage the resource. Safe drinking water and necessary improvements to waste water systems are well within the jurisdiction of county government and we continue to seek funding sources and work cooperatively with identified Water Boards actions. Without sustainable funding, counties have a difficult time finding ways to fund a department or even one person to help track and manage these very important issues.

The Concept Paper refers to actions that will require coordination and collaboration across all levels of government. We could not agree more, however, in order to make conservation and/or efficiency a way of life in California, all of California needs to become responsible for its short comings as well as its achievements. Emphasis must be placed on the uniqueness of each area. We appreciate the idea of conservation however, we believe that conservation alone does not always create the best use of water. Efficiency may be a more practical way to evaluate the use of water. An example being, while surface irrigation may not always conserve water, it provides for groundwater recharge which may, depending on the area, be of greater beneficial use than the conservation of water. It is certainly providing beneficial uses to those reliant on the groundwater. Local management and monitoring of water resources could determine efficiency of the water being used and form a basis for recommendations or enforcement of the water use locally. We must remember that each area is unique and what might be best for one area may be detrimental to another.

Overall energy efficiency and coordination should also be included in groundwater management. While energy companies are doing their best to create energy efficiencies by rewarding people with less expensive rates for using their energy during off-peak hours, it creates an unintended consequence to other resources such as groundwater. Irrigation decisions are typically driven by energy costs when given a choice. Entire geographic areas will irrigate during off-peak hours to conserve their money, with the unintended consequence of creating regional cones of depressions in the areas pumping groundwater for irrigation, as well as providing for domestic uses. In addition to greater energy costs to pump the water from a greater depth, this may also cause shallower wells to dewater during these periods of intense pumping. This creates an interesting energy issue that should be evaluated for overall energy and natural resource efficiency.

Proper management of our forested areas should be taken into consideration as these lands play a key role in maintaining a healthy water supply. Well-managed forested lands absorb rain, provide groundwater recharge, reduce flood flows, filter contaminants and provide critical habitat for fish and wildlife.

Recognition of area-of-origin statutes is a basic premise that cannot be compromised. The investment all of California makes in integrated regional water management should promote an increase in local/regional self-reliance. Co-equal goals for the Delta as well as the protection/restoration and sustainability of ecosystems are heavily dependent on the upper watersheds. Surface water storage projects will be essential to creating more sustainable and reliable water sources in the future. The expansion of water storage capacity, such as the proposed Sites Reservoir will not only assist in preparing for dry periods, but will alleviate downstream flood flows, improve operational efficiency of the State and federal water systems, and provide additional water for Delta sustainability. Storage also provides flood relief and ecosystem benefits and has the potential to produce hydropower and provide recreational opportunities. Flows can be managed more efficiently and water can be captured and released as needed to provide benefits to the delta. We recommend bolstering the section regarding storage projects to better reflect the value to the public.

To summarize, the counties of Glenn and Colusa see a great need for sustainable funding at the local level to facilitate ongoing water management activities. On a broader scale, the effects of water conservation and energy efficiency mandates should be examined closely for potential negative impacts to our water resources. Forest management should be addressed as essential to healthy water supplies. And lastly, increased surface water storage should be a priority. Regulatory efficiency can only come from practical solutions endorsed by the Water Boards and supported by the Legislature, and must be backed by political will at the local and regional levels.

Sincerely,



Denise Carter, Chair  
Colusa County Board of Supervisors



Kim Vann, Supervisor  
Colusa County

CC: Eric Oppenheimer;  
Felicia Marcus;  
Caren Trgovich;  
Kathy Mannion



# GLENN COUNTY BOARD OF SUPERVISORS

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December 6, 2013

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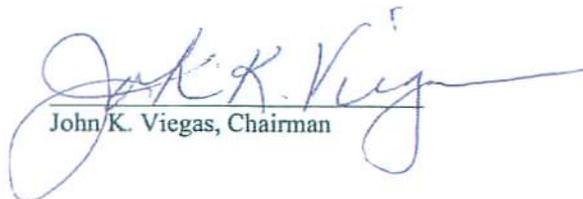
Sincerely,

COLUSA COUNTY BOARD OF SUPERVISORS

GLENN COUNTY BOARD OF SUPERVISORS



Denise Carter, Chairman



John K. Viegas, Chairman

cc: Eric Oppenheimer; Felicia Marcus; Caren Trgovich, Kathy Mannion