

**From:** Bob Harrington [<mailto:bharrington@inyocounty.us>]  
**Sent:** Thursday, November 21, 2013 5:29 PM  
**To:** Oppenheimer, Eric@Waterboards; Linck, Gail@Waterboards  
**Subject:** Comments on draft Groundwater Workplan Concept Paper

Dear Mr. Oppenheimer:

Thank you for the opportunity to provide comment on the Discussion Draft Groundwater Workplan Concept Paper (draft workplan).

The key elements set out in the draft workplan for effective groundwater management are an excellent framework for groundwater management. The five elements – sustainable thresholds, monitoring and assessment, governance and management, funding, and oversight and enforcement – are highly relevant to groundwater management statewide. Successful implementation statewide requires that they are flexible enough to accommodate the variety of conditions present throughout the state. The Water Board needs to assure that local and regional plans that implement this framework are afforded recognition at the state level as satisfying state mandates for groundwater planning, monitoring, and management. Presently, local government efforts at groundwater monitoring and management may not be recognized at the state level even though they contain these key elements.

Current state funding streams generally require compliance with state planning efforts. Local plans developed prior to these legislative efforts often do not fully align with the requirements of the legislation, though they may fully implement the key elements of sound groundwater management. If local plans are implemented through the Courts, they can provide for excellent governance and enforcement, but can be very hard to alter to accommodate state requirements. Local efforts that achieve sound groundwater management should not be penalized for having been implemented prior to state legislation promoting and funding groundwater management.

The draft workplan identifies implementation of the California Statewide Groundwater Elevation Monitoring Program (CASGEM) as a potential action promoting monitoring and assessment. The draft State Water Plan Update 2013 indicates that groundwater basins have been prioritized by DWR, as required by SBX7-6. The State framework for groundwater monitoring should recognize that basins that are deemed to be low priority by the state can also be rated as low priority at the local level. Currently, a local agency that is a potential CASGEM monitoring entity may be ineligible for State water grants and loans if there are basins within the agency's jurisdiction that are not part of CASGEM, regardless of whether a basin is designated as low priority by DWR. Within Inyo County, there are thirty-eight groundwater basins. The County is the CASGEM monitoring entity for thirty-two of those basins, and other agencies are CASGEM monitoring entities for two other basins in the County, leaving four basins without CASGEM monitoring in place. These four low-priority basins potentially make Inyo County ineligible for State water grants and loans – funding which could be used by the County to implement CASGEM in those basins.

The draft plan states *“preventing overdraft largely depends on maintaining a balance between the amount of pumping, natural depletion from a basin, and the amount of recharge.”* (page 2), and later notes that adjudicated basins are often managed according to the principal of balancing extraction and recharge (page 4). The workplan should not promote basin management using the balance between recharge and extraction. Allowing extraction in amounts equal to recharge necessarily means that no groundwater will be available for groundwater-dependent water bodies (e.g., springs, wetlands, gaining streams) or other groundwater dependent resources (e.g., non-aquatic groundwater dependent vegetation such as alkali meadows or mesquite woodland).

Bob Harrington, Water Director  
Inyo County Water Department  
135 S. Jackson  
POB 337  
Independence, CA 93526