

SUBMITTED VIA E-MAIL

December 18, 2013

State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Subject: Draft Groundwater Workplan Concept Paper

State Water Resources Control Board members and staff:

The Turlock Irrigation District (TID) is thankful for the opportunity to review the discussion draft Groundwater Workplan Concept Paper. We believe it is imperative that the State Board hears the perspective of local water agencies and districts responsible for managing water resources. As such, TID offers the following general comments on the Workplan.

- TID wholly agrees with the Board that maintaining local planning and local management of the resource is a best practice. With this point as a foundation, TID supports the Workplan's general approach to the subject.
- It is important that the Workplan notes that each groundwater basin is unique unto itself and should be planned for and managed accordingly at the local level.
- It would be imprudent for readers of the Workplan to assume that water districts such as TID are able to control groundwater resources over which they have no regulatory authority. We recommend the Workplan clearly recognize that districts such as TID have limited authorities within their boundaries and no statutory authority over lands outside their boundaries.
- Critical to the Workplan would be the recognition that there needs to be a nexus between those who benefit from groundwater and those whose efforts replenish groundwater basins. As an example, some non-TID lands that reside within the Turlock Groundwater Basin do not have a surface water supply and are often direct beneficiaries of the TID's service area groundwater resources. The major issues within the Turlock Groundwater Basin are largely concentrated outside and to the east of the TID service area.
- TID agrees with the Workplan's stance on regional leadership and management efforts being backed up with state support. In this vein, TID is actively participating in other local planning efforts, including the work of the Turlock Groundwater Basin Association as well as the implementation of Stanislaus County's recently established Groundwater Ordinance and the County committee that will work to implement the ordinance. These and other efforts, all designed to address groundwater resource issues at the local level, should continue to be supported by any policies considered by the State Board and other regulatory agencies, by providing the tools and funding assistance needed to address issues at the local level.
- Because groundwater sustainability and protection are aims of the Workplan, it is difficult to overstate the importance of surface water supply reliability and its role in groundwater stabilization and replenishment. This should be made clear in revisions to the Workplan. Specific to TID, future reductions in surface water availability from the Tuolumne River would be detrimental to the groundwater sustainability of the local basin because the basin's primary

form of recharge is irrigation water, and the bulk of that irrigation water comes in the form of surface water diverted from the Tuolumne River.

While Stanislaus and Merced counties are the only agencies with regulatory authority over groundwater at the local level in the Turlock Groundwater Basin, there are actions that can be taken by local water districts such as TID to work with the counties and other interested local entities to improve the management of groundwater resources.

As one such example, TID and the Stanislaus Regional Water Authority (consisting of the cities of Turlock, Ceres and Modesto) continue to discuss the details surrounding the potential provision of surface water from the Tuolumne River as a source of municipal water. This is an opportunity to help the cities supplement their groundwater resources with surface water. This effort will help improve local and regional groundwater quality and quantity concerns. TID is currently exploring additional methods and models of regional collaboration that can provide benefits to multiple parties within the region.

TID again thanks you for the opportunity to comment on the current draft. We also ask to be included in any further work by the State Board to be carried out on this important topic. Please let us know if we can be of assistance.



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