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Wednesday, December 18, 2013

Eric Oppenheimer  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**Re: Discussion Draft Groundwater Workplan Concept Paper**

Heal the Ocean (HTO) appreciates this opportunity to provide input on the discussion draft of the State Water Resources Control Board (SWRCB) Groundwater Workplan Concept Paper. Groundwater issues have been a key focus of HTO since our inception, with groundwater pollution representing one of the five elements of our platform. We have collaborated with the City of Santa Barbara (by raising \$60,000 to help pay for the study) in a three year project conducted by the United States Geological Survey (USGS) to research the interaction of groundwater, and groundwater pollution, with the ocean. This was one of the first studies of its kind, and formed a scientific basis for the need to remove septic systems from high-groundwater areas. HTO in fact went on to achieve the removal of 130 septic systems from the south Santa Barbara County coastline, including the Rincon, a world famed surf spot.

HTO has had the opportunity to review the Draft Concept Paper and we are supportive of SWRCB's efforts to the proposals in this draft targeted at better addressing this important issue. As you know, California is one of only two states in the entire country that has not enacted comprehensive groundwater management regulations. We hope that this Concept Paper represents a good first step toward better management of the State's groundwater resources.

Heal the Ocean views groundwater as a key component in the wastewater-recycled water picture that California is now seriously looking at in the face of drought. Groundwater can be recharged with highly treated recycled water, and it also needs to be protected from pollution and overuse. HTO sits on the Santa Barbara County Integrated Regional Water Management (IRWM) steering committee, which includes recycled water production as one area needing funding. The City of Santa Barbara sits atop groundwater that is polluted with highly toxic chemicals, and HTO is actively working with the Central Coast Regional Water Quality Control Board in entering information into the State Geotracker database for the purpose of prioritizing the worst areas for cleanup.

Cleaning up and protecting groundwater reserves for eventual use as storage for indirect potable reuse through aquifer recharge, on-site stormwater capture, or other sources will require not only serious discussion, but funding. **Heal the Ocean views funding as a key**

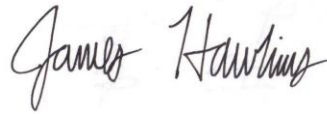
**component to the success of future groundwater programs, and we are happy to see that the SWRCB has included in its preliminary discussion need for a funding source for the cleanup of polluted sites.**

Heal the Ocean looks forward to the SWRCB further developing and refining the Draft Concept Paper in the coming months, and we are eager to be involved.

Sincerely,



Hillary Hauser, Executive Director



James O. Hawkins, Policy Analyst