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**Sent:** Wednesday, December 18, 2013 5:47 PM

**To:** 'eric.oppenhimer@waterboards.ca.gov'

**Subject:** NRCS comments re: State Water Board's "Groundwater Workplan Concept Paper"

CA NRCS has reviewed the State Water Board's "Groundwater Workplan Concept Paper" and appreciate the opportunity. We offer the following comments for your consideration:

1. Item 1, Section 3.2.2 (Monitoring and Assessment; Potential Actions for Others): We fully support the Plan's proposal that DWR create a searchable database for well completion reports. Currently, California Water Code Section 13752 prohibits distributing well completion reports to anyone but the landowner, his or her designee, or a government agency without the owner's permission. The reports provide valuable information about subsurface geology and hydrogeology, which in turn are required to evaluate groundwater quantity and quality. Making well completion reports available to the public and posting the information online would directly and significantly streamline public- and private efforts to develop scientifically-based strategies to address resource concerns related to groundwater quality and quantity at a range of temporal and spatial scales.
2. Item 3, Section 3.2.2 (Monitoring and Assessment; Potential Actions for Others): Updating (and maintaining) the inventory of groundwater basins subject to critical overdraft would facilitate NRCS' annual ranking of applications for conservation assistance, to identify projects that would significantly impact local groundwater quantity, and reject or revise them as appropriate. Along these same lines, updating and maintaining DWR's listing of groundwater basins with widespread occurrences of overdraft and/or limited groundwater storage capacity would also be valuable with regards to NRCS program prioritization, funding, and implementation.
3. Section 3.3.2 (Governance and Management) and Section 3.4.2 (Funding); Potential Recommendations for Others: The existence of thousands of abandoned wells across the state poses a potentially significant threat to groundwater quality, but when private landowners are confronted with the prospect of heavy fines imposed by the local enforcing agencies, the private landowners are often unwilling to step forward and request assistance to properly decommission wells on a voluntary basis. NRCS recommends that SWRCB consider a state-level initiative that would ameliorate private landowner concerns, increase the number of well decommissioning projects, and correspondingly protect groundwater quality. Alternatives could include: a) offering some measure of protection from liability for older wells installed by previous landowners; and b) provide funds to local enforcing agencies to locate/inventory abandoned wells, conduct outreach and education programs, and provide cost-share assistance to decommission wells on private lands.
4. Section 3.4 (Funding; Existing Funding Activities; Other State and Federal Agencies): USDA-NRCS cost-payment programs, notably EQIP (Environmental Quality Assessment Program) are not listed as existing funding sources that support groundwater management projects locally.

If you have any questions, please contact me at 530-792-5661, or Julia Grim, geologist, at 530-792-5623.

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