

To: Eric Oppenheimer
From: Richard Bailey rbailey2@pacbell.net
Date: Wed 12/18/2013 3:29 PM
Subject: Draft Groundwater Workplan Concept Paper

Dear Mr. Oppenheimer,

I would like to thank the State Water Resources Control Board (SWRCB) for the extension of the public comment period on the draft Groundwater Workplan Concept Paper. Significant thought has been put into its development; however, I believe that there are several flaws in the concept as proposed.

The concept proposes an expansion of the SWRCB role beyond its traditional role regulating groundwater quality. This expansion is proposed to take place using a top down management approach where the SWRCB role to include extraction quantity determinations which would ultimately necessitate the SWRCB selecting among competing uses. Local governments, local organizations and local users are relegated to the secondary role of implementing determinations dictated by the SWRCB or providing input for the use by the SWRCB in determining how much groundwater can be extracted.

This concept should be rewritten to enhance the local role in managing their resources with technical guidance, support and expertise provided by the SWRCB. A top down groundwater management approach as proposed should be avoided, being replaced by local consensus driven management of this important resource. The role of local agencies should be enhanced rather than minimized as proposed in the draft concept paper.

Thank you.