April 29, 2016

Sarah Sugar  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Re: Comment Letter—Temporary Permits for Groundwater Storage

Dear Ms. Sugar:

Thank you for the opportunity to provide comments to the State Water Resources Control Board (SWRCB) related to the temporary permits for groundwater storage/recharge. The City of San Diego greatly appreciates the opportunity to provide input to the State Water Board’s process for permitting these projects.

The City of San Diego is greatly concerned with the temporary permits for groundwater storage/recharge due to the potential “temporary loss of groundwater storage” this could occur in the City’s groundwater basins. The permitting process currently allows excess water to be stored as groundwater the water can be diverted and used without injury to any lawful user of water. Unfortunately, it is not discussed in the permit how or to what extent this would occur or exactly what a “lawful” user is defined as. In one of the City’s basins Pueblo water rights have priority over other water rights in the groundwater basin and this is not discussed in the permit. The City requests that the Board include a definition for review of what a “lawful user” is and that include a discussion of the hierarchy of water rights in executing a permit application.

The other impact that the City of San Diego is concerned about is in regards to the cumulative impacts analysis that considers the potential when several of these temporary permits are approved together (in the same groundwater basin) and the impacts on groundwater resources in conjunction with related present and future projects (in that specific groundwater basin) occurs. We request that the Board considered the potential adverse cumulative affects on groundwater storage associated with approving these temporary permits to other water rights users in the groundwater basin. The potential reduction in storage associated with these temporary permits could reduce available groundwater supplies or have potential cumulative effects on groundwater supplies and affect the water rights of the users of the groundwater basin, such as the City of San Diego.
The City of San Diego has a long history of success in meeting the drinking water needs of its rapidly growing and diverse population. We are thankful for the opportunity to comment on the Temporary Permits for Groundwater Storage and look forward to continuing to work with the Board in the future. If you have any questions in the meantime, please feel free to contact me at (619) 533-4235.

Sincerely,

Sandra Carlson, P.E.
Associate Civil Engineer, Long-Range Planning & Water Resources Division

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