



December 17, 2013

1100 K Street
Suite 101
Sacramento
California
95814

Telephone
916.327-7500

Facsimile
916.441.5507

Ms. Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: Discussion Draft – Groundwater Workplan Concept Paper

Dear Chair Marcus:

On behalf of the California State Association of Counties (CSAC), we thank you for this opportunity to provide input on your Draft Groundwater Workplan Concept Paper (Groundwater Workplan). CSAC is the Association that represents county government before the California Legislature, administrative agencies and the federal government. Representing all 58 of California Counties, CSAC places a strong emphasis on educating the public about the value and need for county programs and services critical for healthy and sustainable communities.

As part of our commitment to education, CSAC in conjunction with the Rural County Representatives of California (RCRC), held a forum with you and Water Board staff on November 15 to present, answer questions, and receive comments on the Groundwater Workplan and to receive comments on the recently released California Water Action Plan (Water Action Plan). As you know almost 40 county representatives representing 19 counties participated in the meeting. Also attending were representatives of affiliated organizations including the League of California Cities and the California Association of Environmental Health Administrators. We want to thank you for your willingness to engage in an open dialogue on groundwater and we look forward to continued collaboration on this important issue.

While concise, the Groundwater Workplan presents several compelling issues and challenges the State, regions and locals must face to effectively manage California's groundwater. Counties concur with the Groundwater Workplan's assertion that our collective success on this issue will require well-equipped and well-funded local and regional groundwater management entities using updated monitoring information and data to manage and maintain groundwater of efficient quality at sustainable levels over the long-term.

At the November 15th workshop, several jurisdictions raised the concern regarding the need for better data management. This point is highlighted in the Groundwater Workplan as one of the key elements necessary for effective groundwater management. CSAC concurs with this point and stresses the importance of funding for such activities. In order to determine appropriate and sustainable thresholds and basin prioritization, it is critical to understand the needs of each basin. CSAC supports the Workplan's statement that successful groundwater management requires access to sufficient funding for development and implementation of groundwater management plans and monitoring, such as the Groundwater Ambient Monitoring and Assessment Program (GAMA) and the California Statewide Groundwater Elevation Monitoring Program (CASGEM). These programs are vital to the identification of seasonal and long-term trends as they are the clearinghouse for groundwater elevation data. Funding for these programs is running short, and according to a 2012 status report to the Legislature,

funding for these programs will be exhausted by 2014. Counties strongly urge the State to continue to fund these vital programs.

Also included in the funding discussion is mention of local authority to assess fees to cover the costs of local and regional management. While this is correct, local jurisdictions are constrained by the need for voter approval at the local level in conformance with Proposition 218 (Prop 218) in order to raise additional revenue to fund vital services, such as stormwater management. As you are well aware, water quality requirements imposed by the Regional Water Quality Control Boards on cities and counties have steadily increased over the years, driving up the compliance costs for their water quality/clean water programs. The Regional Boards are also working continuously on developing Total Maximum Daily Load (TMDL) requirements for waterways and new water quality (NPDES) permits every five years, which adds yet more costs to county programs. These programs work hand in hand with groundwater programs as surface and groundwater management are inextricably linked. However, often times approval for increased fees at the local level is difficult to achieve. Counties stress the importance of addressing the Prop 218 issue for stormwater as it is an ever increasing problem. An amendment is required to the California Constitution to allow fees and charges for stormwater to work the same as fees and charges for water and waste water. CSAC welcomes Water Board support for addressing the Prop 218 issue.

Finally, with regard to governance, counties support the Groundwater Workplan's continual acknowledgement that local and regional management of groundwater basins has produced impressive results and that the governance and management of groundwater in California is done at various local, regional and State agencies. CSAC urges the Water Board to focus on developing a Workplan that respects this governance structure and its own existing authority and responsibilities.

CSAC would like to again thank you and your staff for your willingness to engage local officials on this important discussion. We look forward to continuing to work with you on achieving an organized and effective groundwater management program in California. Should you have any questions regarding our comments, please contact me at 916-327-7500, ext. 504, or cmartinson@counties.org.

Sincerely,



Cara B. Martinson
Associate Legislative Representative

cc: Members, State Water Resources Control Board
Tom Howard, Executive Director, State Water Resources Control Board