

December 17, 2013

State Water Resources Control Board
Attn: Eric Oppenheimer via email at eric.oppenheimer@waterboards.ca.gov

Re: COMMENTS ON DRAFT GROUNDWATER WORK PLAN CONCEPT PAPER

Dear Mr. Oppenheimer,

The Association of Ground Water Agencies (AGWA) is a coalition of groundwater basin managers in Southern California, all of which rely on water supplied by Metropolitan Water District (MWD). AGWA, which was formed in 1994, represents all of the groundwater management entities within MWD's service area and has been actively engaged in a dialogue with MWD regarding the role and institutional relationship between MWD and the groundwater entities regarding the utilization of the groundwater basins to meet regional water supply objectives. Thank you for the opportunity to comment on the Draft Groundwater Work Plan Concept Paper (Draft Paper). AGWA members reviewed the draft and offer the following general comments. We have also encouraged our members to provide individual comments specific to each agency's position.

Our main concern is maintaining local control and local management of Groundwater Basins. While we see some improvement over past State Water Resources Board (State Board) perspectives on the importance of this approach as opposed to centralized, state regulation, we still feel that the Draft Paper presents a somewhat negative connotation on this subject (e.g., page two, paragraph 1: "groundwater management has largely evolved on an as needed basis in a *decentralized* manner across the State. *In spite of this...*). The Draft Paper should be revised to be very clear on the core perspective (as we understand it) that different actions are needed in areas where groundwater is not being managed and protected. The fact that there are many Groundwater Basins currently being managed effectively cannot be stressed enough in such a widely distributed document. As you know, we strongly believe that comprehensive, effective management of groundwater is not only possible; it is most effective through local control wherever possible.

Additionally, it may be helpful to define what you mean by "local" and "regional" management. Clearly defining what is meant by "local" versus "regional" management will help avoid misinterpretation during

Members:

Calleguas Municipal Water District
Chino Basin Watermaster
Eastern Municipal Water District

Main San Gabriel Basin Watermaster
Mojave Water Agency
Orange County Water District
Raymond Basin Management Board
San Bernardino Valley Water Conservation District

Upper Los Angeles River Area Watermaster
Water Replenishment District of Southern California
Western Municipal Water District

Affiliates:

Bookman-Edmonston
Cadiz, Inc.
CH2M Hill
City of Riverside
Hargis & Associates
Indian Wells Valley Water District
Komex H2O Science
Metropolitan Water District of Southern California
MWH Americas
Navigant Consulting Inc.
Psomas
San Gabriel River Water Committee
Santa Clara Valley Water District
Stetson Engineers Inc.
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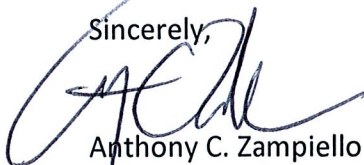
implementation. There should be a short discussion of the different forms of groundwater management included that describes management through adjudication, special act agencies, etc. To be fair, the Draft Paper does highlight the fact that local conditions are unique and that is one of the reasons why a "one-size-fits-all" approach to groundwater management or regulation will not work. Our members unanimously felt that the Draft Paper should include a discussion of water rights and how that subject ties into other key issues from a regulatory and public trust perspective. Also, it is not clear if the concepts discussed in the Draft Paper are intended to expand the State Board's existing jurisdiction. We feel strongly that this and the other issues mentioned above should be further expanded upon and better explained.

We also recommend noting that groundwater, historically, has not received the same level of state funding that has been made available for export facilities. Indeed, one of the reasons that groundwater hasn't been developed or managed in some areas is because imported water has been used rather than investing long-term in groundwater infrastructure for transport, storage and treatment. More emphasis on this might help legislators understand why it is so important to support groundwater in new bond measures. We think it is also important to emphasize that water customers/ratepayers pay the costs associated with groundwater management. It is important that those investments and the burden they place on ratepayers be acknowledged. We are concerned increasing costs to already well managed Groundwater Basins will adversely impact local storage and clean-up activities currently underway.

The State Board must clearly distinguish approaches and actions it feels may be appropriate, even site specific cases where current management and control efforts both are, and are not protecting groundwater resources. Such an approach might serve to create an incentive for recalcitrant parties by setting a clear level of expected management. The main purpose of State involvement should be to provide tools for areas not being managed correctly while allowing properly managed Basins to continue protecting and enhancing this resource.

Lastly, we believe that the State Board should consider creating an oversight group to help guide the process of developing and implementing a worthwhile Groundwater Work Plan. Our members welcome the opportunity to work with you further to refine the development of implementation, planning and strategy development.

Sincerely,



Anthony C. Zampello
President

cc: AGWA Board of Directors