



Santa Barbara
CHANNELKEEPER®

714 Bond Avenue
Santa Barbara, CA 93103

tel 805.563.3377
fax 805.687.5635

info@sbck.org
www.sbck.org

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December 18, 2013

Eric Oppenheimer
State Water Resources Control Board
1001 I Street
Sacramento, CA 95812-0100
Sent via email: eric.oppenheimer@waterboards.ca.gov

RE: DRAFT GROUNDWATER WORKPLAN CONCEPT PAPER

Dear Mr. Oppenheimer:

Santa Barbara Channelkeeper strongly supports the State Water Resources Control Board's work to develop a Groundwater Strategic Plan that includes key provisions to protect public health and the environment. Channelkeeper is a non-profit organization whose mission is to protect and restore the Santa Barbara Channel and its watersheds through science-based advocacy, education, field work and enforcement. Since 2001, we have been a strong and vocal advocate for policies that protect surface waters throughout our region. While our efforts to this point have largely focused on our streams, rivers, wetlands and beaches, our organization has evolved to appreciate the interconnectedness of surface and groundwaters as well as the impacts on the public caused by groundwater contamination.

Our region is significantly impacted by groundwater pollution and overdraft. Private and public drinking water wells in the Goleta, Santa Barbara, and Carpinteria areas are heavily contaminated with nitrate at levels that exceed State Water Quality Objectives for drinking water, forcing community members and public water districts to pay for treatment or acquisition of alternative supplies to meet our water demands. Throughout much of our region, this form of groundwater pollution also impacts our streams and rivers through shallow surface-groundwater interactions. Contaminated shallow-spring water serves as the primary source of surface flows in streams in the Goleta and Carpinteria areas, and as a result, many of our streams are impaired with nitrate.

We also focus much of our effort on protecting and restoring the Ventura River watershed, which is officially designated as impaired on the 303(d) List of Water Quality Limited Segments for "pumping and water diversions." Surface flows in portions of the Ventura River are directly impacted by shallow groundwater pumping that occurs in the unconfined aquifer underlying the river. This disruption of surface flows not only impacts habitat and recreational opportunities, but also exacerbates surface water quality impairments caused by nutrient contamination, eutrophication, and other contaminants.

Channelkeeper strongly believes that strategic management of California's groundwater resources should be a key priority for the State Water Board. We urge the Board to ensure that key actions are included in the Groundwater Strategic Plan to protect the public's interest in clean and abundant groundwater supplies. The Plan must also address impacts of groundwater pumping on in-stream flows and the public trust resources that depend on them. We echo recommendations developed and submitted to the State Water Board by California Coastkeeper

Keeping watch for clean water

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Alliance and Environment Now.¹ In particular, Channelkeeper urges the Board to develop a Plan that:

- Recognizes that groundwater and surface waters are physically interconnected, and that laws must be updated to accurately reflect the physical interconnection to protect in-stream flows from excessive groundwater withdrawals.
- Identifies precise actions to control groundwater pumping and address overdraft.
- Identifies precise actions to address nitrate and industrial pollution impacts to groundwater quality.
- Reflects the severity of contaminated drinking water and associated impacts to environmental justice communities by enshrining key principles such as the human right to safe drinking water and the “polluter pays” principle;
- Provides clear guidance to Regional Boards calling for improved enforcement of existing regulatory tools available to improve groundwater quality; and
- Emphasizes stormwater capture as a water quality control for stormwater runoff and encourages stormwater capture at the local level.

Santa Barbara Channelkeeper urges the State Water Board to work with staff to add these key provisions into the Groundwater Strategic Plan. Thank you for your work to ensure that California’s waterways are safe for swimming, drinking, and fishing for everyone.

Sincerely,



Ben Pitterle
Watershed and Marine Program Director
Santa Barbara Channelkeeper

¹ December 14, 2013. California Coastkeeper Alliance and Environment Now, Letter to Eric Oppenheimer, State Water Resources Control Board. Re: Draft Groundwater Workplan Concept Paper