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ENVIRONMENTAL HEALTH DIVISION

December 13, 2013

Eric Oppenheimer, Director
Office of Research, Planning & Performance
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814

Via electronic mail

Eric.Oppenheimer@waterboards.ca.gov

RE: Initial Comments on Discussion Draft Groundwater Workplan Concept Paper

Dear Mr. Oppenheimer,

The Butte County Public Health Department appreciates the opportunity to provide initial comments on the Discussion Draft Groundwater Workplan Concept Paper (Groundwater Workplan). Our Department has been updated on the progress of this Groundwater Workplan through the participatory efforts of Butte County's Department of Water and Resource Conservation. Our Division of Environmental Health works in concert with Water and Resource Conservation to manage our local groundwater resources as the permitting authority for all wells drilled within the County. Additionally, we have a staff representative that serves on the Water Commission's Technical Advisory Committee that, among other things, reviews and recommends approval of annual Basin Management Objectives to the Board of Supervisors. Protection of the groundwater resources is a shared goal between our departments.

Our County has made great strides in groundwater management during the last fifteen years. The programs put into place are too many to list here, but we would encourage State Water Board staff to work directly with our county to become more familiar with local regulations, and how these efforts could be enhanced and supported by the state. It is our strong opinion that the protections put into place for our county, which were formalized through the local public process, should hold precedence over a "one size fits all in the state" legislative approach.

Our hope would be that regional and localized efforts would be recognized and supported by all agencies currently involved in groundwater management throughout the state. All counties in the state, but particularly those in rural areas, understand that overly apportioned funds and staff can inhibit efficiencies. Both technical and financial assistance could be pointedly focused on proven resource management before consideration is given to generating any further legislation. The proposed framework may impose new costly requirements at the local level, while simultaneously diverting already scant oversight resources in any number of new directions suggested by new legislative controls. Any efforts outlined in the Groundwater Workplan should focus on maximizing supportive resources.

We would like to encourage further clarification on many of the ambiguous terms and vagaries in who will enforce the suggested legislation. It would be helpful to outline proposed requirements on a basin level

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rather than a statewide level. Currently, the issues highlighted with regard to nitrates and saline do not apply to our basin. Would we be required to participate in funding regulation for something that does not directly apply to our area?

To summarize, Butte County Public Health respectfully requests State Water Board consideration of the following recommendations:

- The Groundwater Workplan should focus on potential State Water Board actions that are within its authority and responsibilities.
- The Groundwater Workplan should go into greater detail so that the reader has a better understanding as to what is intended.
- The Groundwater Workplan should consistently throughout the document acknowledge that local and regional groundwater management entities are the responsible agencies, and focus on how the State Water Board can assist these agencies in accomplishing their mission.
- Recommendations for what other State agencies "could" or "should" do should be deleted. These recommendations do not improve, but rather detract, from the document.
- Recommendations for what the Legislature "could" or "should" do relating to enactment of new legislation should be deleted. Instead, the Groundwater Workplan should defer to what appears to be the Water Action Plan process involving stakeholders for developing proposed recommendations for actions to improve groundwater management.
- The Groundwater Workplan should focus on assisting groundwater management entities in groundwater basins that would benefit most from State technical and financial assistance.
- The State Water Board, in the Groundwater Workplan, should prioritize actions it intends to undertake with an eye towards maximum return. Resources will remain limited, and other State priorities remain unfunded.
- The Groundwater Workplan should define the terms used in the document.

Again, we welcome any opportunity to further educate state staff on our local efforts to manage and protect groundwater resources, and look forward to reviewing any subsequent versions of the Groundwater Workplan. Please contact Kristen McKillop at 530-538-7283 with any further questions you may have.

Kindly,


Cathy Raevsky
Butte County Public Health