



SAN JOAQUIN FARM BUREAU FEDERATION

MEETING TODAY'S CHALLENGES / PLANNING FOR TOMORROW

Attention: Mr. Eric Oppenheimer

December 18, 2013

State Water Resources Control Board

P.O. Box 100

Sacramento, CA 95812

Re: Groundwater Workplan

Dear Mr. Oppenheimer,

The San Joaquin Farm Bureau Federation is a private, not for profit, volunteer organization that has been advocating on behalf of our 4,000 members and the agricultural industry in San Joaquin County for almost one hundred years. We appreciate the opportunity to comment on the State Water Resources Control Board's Groundwater Workplan.

In San Joaquin County, our groundwater is monitored at the county level, at the direction of the Northeastern San Joaquin County Groundwater Banking Authority, the Advisory Water Commission, and the San Joaquin County Board of Supervisors. Through this broad representation of community stakeholders, we have the knowledge, resources, and capability to continue to monitor and manage our groundwater locally. As the Workplan correctly states, "regional management has produced impressive results in many areas of the state", and that fact should be emphasized rather than disregarded in favor of state oversight.

In light of our participation in water issues at the local level, we have significant reservations concerning the vague mission statement of the workplan that reads:

"We envision a future where well-equipped local and regional groundwater management entities use monitoring information and thresholds to manage and maintain groundwater of sufficient quality at sustainable levels over the long-term; and where local and regional management efforts are backed-up by State support and oversight, where needed."

This statement is far too ambiguous and it will lead to an open ended expansion of the State Water Resource Control Board's powers beyond reason, particularly in San Joaquin County. Sustainable levels are decisions that should be made at the local level, where the particular needs of the community are best appreciated. Furthermore, it is not understood from

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the workplan how this level will be determined and what factors will be considered, nor is the period of "long term" sustainability adequately defined.

The State Water Resource Control Board's intent to impose supervision "where needed" is unclear, as the State should not have the authority to unilaterally decide oversight is necessary based upon standards formed with no local input for an indefinite period of time.

We intend to stay engaged at the local level, as agriculture is a driving force of our local economy that depends on groundwater. We will continue monitor this issue closely and look forward to any further opportunity to provide input.

Sincerely,

A handwritten signature in blue ink that reads "Jack Hamm".

Jack Hamm

President

San Joaquin Farm Bureau Federation