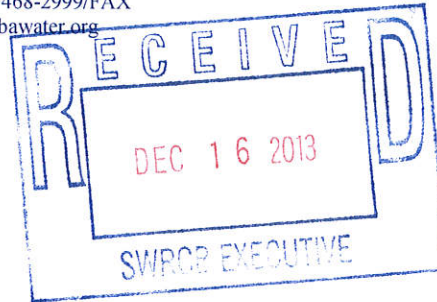




## NORTHEASTERN SAN JOAQUIN COUNTY GROUNDWATER BANKING AUTHORITY

1810 EAST HAZELTON AVENUE  
STOCKTON, CALIFORNIA 95205  
(209) 468-3531  
(209) 468-2999/FAX  
[www.gbawater.org](http://www.gbawater.org)



KEN VOGEL  
CHAIRMAN

THOMAS M. GAU  
SECRETARY

December 12, 2013

Ms. Felicia Marcus, Chair  
State Water Resources Control Board  
Post Office Box 100  
Sacramento, California 95812-0100

SUBJECT: COMMENTS REGARDING THE DRAFT GROUNDWATER  
WORKPLAN CONCEPT PAPER

Dear Ms. Marcus:

The Eastern San Joaquin County Groundwater Basin Authority (GBA) has reviewed the Draft Groundwater Workplan Concept Paper (Concept Paper) and the GBA agrees that groundwater management is a critical aspect of comprehensive water management in California. The GBA respectfully submits the following comments with the hope that the State Water Resources Control Board (SWRCB) will note that the groundwater management efforts by stakeholders in Eastern San Joaquin County over the span of the last quarter century have been successful. Continued success will depend on maintaining locally based governance, as local stakeholders who are dependent on the health of the underlying basin are in the best position to determine the best course of action.

Historically, stakeholders in Eastern San Joaquin County have found it difficult to wield the political and financial power necessary to mitigate the conditions of groundwater overdraft. Eastern San Joaquin County groundwater interests have come to realize that a regional consensus-based approach to water resources planning and conjunctive water management increases the chance for success. Since its formation as a Joint Powers Authority in 2001, the GBA has employed a consensus-based approach to groundwater management.

The GBA has become increasingly concerned with the mounting discussions calling for the legislature and State agencies, such as the SWRCB and the Delta Stewardship Council, to perhaps revisit recommendations similar to that of the Legislative Analyst's Office 2010 report, which suggested that steps could be taken by the State to regulate and control groundwater rights in the same manner as surface water rights. While the nexus for the State to exercise existing or newly developed powers in terms of groundwater management is debated amongst legal practitioners, there are clearly actions and programs that the State has sponsored either through bond funding or through other directives that have been successful. The most successful endeavors have a common theme, which is to empower local entities through the development of groundwater management plans and groundwater studies or through funding for local projects for groundwater recharge or remediation.

ORPP

GBA MEMBERS

CALIFORNIA WATER SERVICE COMPANY  
CENTRAL DELTA WATER AGENCY  
CENTRAL SAN JOAQUIN  
WATER CONSERVATION DISTRICT  
CITY OF LODI  
CITY OF STOCKTON  
NORTH SAN JOAQUIN WATER  
CONSERVATION DISTRICT  
STOCKTON EAST WATER DISTRICT  
SAN JOAQUIN COUNTY  
SOUTH DELTA WATER AGENCY  
WOODBIDGE IRRIGATION DISTRICT  
SAN JOAQUIN FARM BUREAU  
FEDERATION - ASSOCIATE MEMBER

The Integrated Regional Water Management (IRWM) Program, administered by the Department of Water Resources (DWR), is a comprehensive approach to water resources management, which links the spectrum of water management strategies from ecosystem restoration, water supply reliability, flood management, conjunctive use, and water demand reduction. Bond funding through Propositions 13, 50, 1E, and 84 has enabled communities to address groundwater management issues in ways that provide multiple benefits across varying water management strategies, as well as targeted benefits for the economically disadvantaged. The IRWM Program is a natural extension of the Eastern San Joaquin Groundwater Basin Groundwater Management Plan adopted in 2004. The GBA has included in its most recently adopted enabling charter a commitment to continue to maintain and implement the Eastern San Joaquin IRWM Plan.

The GBA has received two DWR IRWM planning grants totaling just over \$1 million. These bond funds have enabled the GBA to collect valuable land and water use data in a cost effective manner. The data developed, coupled with formal groundwater level measurements taken semi-annually since 1971, have enabled the GBA to better understand groundwater on a basin-wide scale and locate where, and to what extent, overdraft conditions exist today. Documenting the amount and location of groundwater level increases over the years is a critical metric, which validates the work done to manage groundwater levels.

The GBA is happy to report that locally, there have been significant groundwater level increases in portions of the basin over the last 25 years throughout the basin due to reductions in groundwater demands as more efficient water use techniques have been implemented by both agricultural and urban water users. Additionally, the Cities of Escalon, Lathrop, Lodi, Manteca, Stockton, and Tracy, in partnership with the South San Joaquin Irrigation District (SSJID), Stockton East Water District (SEWD), and the Woodbridge Irrigation District (WID), have all implemented surface water treatment plants in-lieu of continued or increased groundwater pumping. Agriculture in the service areas of the North San Joaquin Water Conservation District, Central San Joaquin Water Conservation District, SEWD, WID, and SSJID have plans to increased surface water use in-lieu of groundwater pumping. A third technique being explored by GBA member agencies to replenish the groundwater basin is groundwater recharge utilizing dedicated ponds and flooded fields to capture and store water when available.

While the GBA's member agencies have enjoyed over two decades of success, and spent over \$700 million in water resources projects, additional projects are needed to address areas of the basin which continue to be exposed to drought risk caused by natural phenomena and/or potentially through supply reductions brought upon by regulatory or water right actions. Entering the third year of a natural drought, the GBA recognizes that the areas most susceptible to these drought risks may be the focus of future conjunctive use projects.

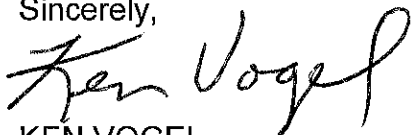
The GBA has also made significant strides in better understanding the hydrodynamics and geochemical processes of the underlying basin. The GBA has partnered with DWR and the United States Geologic Survey (USGS) to study the sources and migration of saline groundwater, and the mechanisms for groundwater recharge throughout the underlying basin. These studies have enlightened the GBA on the science of groundwater flow and recharge, and will enable GBA members to utilize the latest available science to collect key data for the design and operation of future conjunctive use projects.

Upcoming decisions by the SWRCB affecting future surface water allocations could further complicate how the underlying groundwater basin will be managed. The promise of future surface water deliveries for the area of origin is critical for future conjunctive use projects to remain a viable alternative for Eastern San Joaquin County. The GBA recognizes the immense pressure the SWRCB must be under to somehow reallocate water shortages from existing entitlements for fish and competing junior water interests. The GBA remains gravely concerned that the SWRCB's process to allow more salinity in the South Delta and to release a significant portion of water from New Melones Reservoir to mitigate the decline of Delta fishers threatens the viability of future conjunctive use projects. Such actions would also fail to adequately honor water rights priorities and the protections afforded to the South Delta and Eastern San Joaquin County.

The GBA leaves you with this latest major accomplishment. On September 24, 2013, East Bay Municipal Utility District (EBMUD) and San Joaquin County entered into an agreement to begin the development of a Groundwater Banking Demonstration Project in Eastern San Joaquin County. The GBA would like to highlight this partnership for a well-balanced project delivering mutual benefits, while mitigating adverse impacts, as an example of a project that incrementally solves two Statewide water issues: providing adequate groundwater storage to meet the needs of local groundwater users, as well as interregional cooperation to meet the groundwater storage needs of a partner from another region. EBMUD and San Joaquin County expect to complete preliminary engineering and have a project implementation agreement in place by the end of 2014.

Thank you for considering the Eastern San Joaquin County Groundwater Basin Authority's comments. Should you have any questions, please feel free to contact Brandon Nakagawa, Water Resources Coordinator, at (209) 468-3089.

Sincerely,



KEN VOGEL

Chairman

Eastern San Joaquin County  
Groundwater Basin Authority

KV:BN:mk  
WR-13L022-M1

c: Eric Oppenheimer, State Water Resources Control Board  
Phil Isenberg, Chair Delta Stewardship Council  
East Bay Municipal Utility District  
San Joaquin County Board of Supervisors  
GBA Board of Directors