

State Water Resources Control Board
P.O. Box 100
Sacramento CA, 95812

December 18, 2013

RE: PCFFA/IFR Comments on Groundwater Strategic Workplan

Dear Members of the State Water Board:

The Pacific Coast Federation of Fisherman's Associations and the Institute for Fisheries Resources represent the rights of commercial fishing men and women on the west coast and fight for the long-term survival of commercial fishing as a productive livelihood and way of life.

Thank you for the opportunity to comment on the California Water Board's Groundwater Strategic Workplan. We strongly support the Board's efforts to develop a groundwater plan; however, we encourage the Board to incorporate an explicit acknowledgment of the physical interconnectivity between groundwater and surface flows into its plan. Specifically, groundwater pumping thresholds should reflect impacts to surface water flows, water bodies that are deemed impaired under the Clean Water Act should be prioritized for groundwater monitoring, and the Board should seek funding for the adjudication of additional basins.

Groundwater Thresholds Should Reflect Impacts to Surface Water Flows

The Board should develop thresholds for groundwater pumping that adequately safeguard streams from flow impairment by prohibiting any pumping of aquifers that would adversely affect instream flow.

The correlation between aquifers and streams is incontrovertible as water pumped from the groundwater system alters the flow of groundwater movement directly reducing the amount of stream flow. Thus, California's unmanaged and unsustainable groundwater pumping practices directly impact the surface water flows. In turn, a reduction in natural stream flow degrades public trust resources such as fisheries. Therefore, in developing sustainable thresholds for groundwater pumping, the Board should give considerable weight to the impacts groundwater pumping has on surface water flows and should develop thresholds that effectively preclude any pumping of aquifers that negatively alters natural stream flow. These thresholds should then be enforced by local groundwater management entities.

CWA Impaired Waterbodies Should be Prioritized for Groundwater Monitoring

Basins with surface waters that have been deemed impaired under the federal Clean Water Act should be prioritized for groundwater monitoring in order to circumvent the complete loss of fisheries and other public trust resources within these

waterways. Not only does excessive pumping of aquifers underlying an impaired waterbody further impair flows, but contaminants introduced to aquifers can flow towards the point of discharge and into the stream further degrading an already weakened resource.

Furthermore, the laws must be updated to accurately reflect the clear relationship between groundwater and surface water so the impact of groundwater withdraws on natural flows can be adequately addressed.

Adjudication of Additional Basins

Because of the clear water quality and quantity implications that are a direct outcome of excessive groundwater pumping, the Board should immediately request an allocation of funding by the legislature for the adjudication of more basins pursuant to its authority under Water Code section 2100. Additionally, the state should consider a moratorium on any new water rights permits until the adjudication is complete.

We respectfully request that the Board amend its Groundwater Strategic Plan to include the above provisions.

Thank you.

Sincerely,

Rachel Hawkins, Law Fellow
Pacific Coast Federation of Fisherman's Associations (PCFFA) &
Institute for Fisheries Resources (IFR)