



October 7, 2021

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Melissa Sparks-Kranz
Executive Policy Advisor to the Deputy Director
Statewide Groundwater Management
Department of Water Resources
1416 9th Street
Sacramento, CA 95814

Re: Draft Groundwater Management and Drinking Water Well Principles and Strategies

Dear Ms. Sparks-Kranz,

On behalf of the California Groundwater Coalition (CGC), thank you for the opportunity to comment on the Draft Groundwater Management and Drinking Water Well Principles and Strategies (Principles and Strategies). CGC members include public and private groundwater management entities located throughout California and consist of experts with technical, legal, and professional groundwater and related expertise.

DWR should clarify the scope and applicability of the Principles and Strategies.

The Department of Water Resources (DWR) should clarify how DWR will integrate these Principles and Strategies into existing groundwater supply and drinking water programs and management frameworks. CGC members have successfully managed groundwater basins for decades. This includes groundwater basins with successful management programs based on adjudications and DWR-approved Alternatives to comply with the Sustainable Groundwater Management Act (SGMA). The implementation of Principles and Strategies should fit within the existing context of groundwater basins that are adjudicated and other successful groundwater management programs such as basins with DWR-approved Alternatives.

Implementation of Principles and Strategies should preserve local control

Local conditions should guide use and implementation of the Principles and Strategies developed for drinking water wells, allowing flexible management by local agencies. By way of example, SGMA was predicated on the concept that local control is the preferred means by which to achieve sustainability. Principles and Strategies related to drinking water wells should similarly reflect local interests and a preference for control of implementation by local Groundwater Sustainability Agencies, basins with DWR-approved Alternatives, or other responsible entities in adjudicated basins.

For example, the parties to the Chino Basin Judgment have invested substantial time and resources to craft a basin management program that addresses the needs of all of the parties while ensuring sustainability. As the result of the time and effort invested by those parties, they reasonably expect to be able to rely on the plans, rules and governance structure that have been in place as early as 1978. Parties to the Chino Basin Judgment rely on water they have stored in the Basin pursuant to the Judgment and OBMP Implementation Plan. Principles and Strategies should prefer local level management so that the parties to the adjudication are not faced with the choice of seeing their efforts and investment frustrated by incompatible management plans or investing more time and money in ineffective efforts.

Implementation Guide Appendix to Principles and Strategies must be circulated for public comment.

At the September 23, 2021 public webinar presenting the draft Principles and Strategies, DWR stated that an implementation guide would be included as an appendix to the final Principles and Strategies. Prior to final publication of the Principals and Strategies, this implementation guide should be made public for review and comment consistent with DWR's expressed intention to consider stakeholder input.

Thank you for the opportunity to provide these comments on the Principles and Strategies. If you have questions about any of CGC's comments please contact our Legislative Advocate, Rosanna Carvacho Elliott at 916-812-6519 or rosanna@clearadvocacy.com.

Sincerely,



Ann DuBay
President, California Groundwater Coalition