

COUNTY EXECUTIVE OFFICE

Ralph Cordova Jr.
County Executive Officer



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VIA U.S. MAIL AND E-MAIL (SGMPS@water.ca.gov)

California Department of Water Resources
Attn: Lauren Bisnett, Public Affairs Office
P.O. Box 942836
Sacramento, California 94236

Re: Draft Groundwater Sustainability Plan Emergency Regulations Public Comment

Dear Ms. Bisnett:

The County of Imperial (County) appreciates the opportunity to comment on the Department of Water Resources' (DWR) Draft Groundwater Sustainability Plan Emergency Regulations released on February 18, 2016 (Draft GSP Regulations).

Groundwater management has been a priority for the County for over twenty years, when the County became one of the few jurisdictions in the state to adopt and enforce a local groundwater ordinance (Title 9, Division 22, of the Imperial County Code of Ordinances (Groundwater Ordinance)). The County reaffirmed its commitment to groundwater management in its recent decision to serve as a Groundwater Sustainability Agency (GSA) under the Sustainable Groundwater Management Act (SGMA) for the groundwater basins located within the County, even though most of them are low- and very low-priority basins that are not required to be managed under SGMA. The County is currently working with the Imperial Irrigation District and Coachella Valley Water District to resolve their overlapping GSA boundaries in some of the basins.

The County is considering whether to develop a Groundwater Sustainability Plan or submit the Groundwater Ordinance as an Alternative Plan for management of the groundwater basins under SGMA. The County requests further clarification by DWR on the following provisions in the Draft GSP Regulations.

1. For GSAs managing multiple basins, allow for a single GSP covering multiple basins.

Section 354.8 requires a GSP to include a description of the geographic areas covered, maps of the "basin" that depict the "area management by the Plan and name and location of any adjacent basin."

The County requests that the Draft GSP Regulations be revised to allow GSAs that will manage multiple basins, such as the County, to adopt an aggregated GSP document that would contain all sustainability metrics in one document, with individual information broken down according to basin. This would avoid duplication of efforts and costs for information that is similar across all basins, such as many of the administrative requirements identified in Article 5, Subarticle 1 of the Draft GSP Regulations.

2. **Include exceptions from the GSP submission deadline and CASGEM requirements for Low- and Very Low- Priority Basins.**

Section 358.4(a) and (b) provide that only GSAs with basins that are CASGEM-compliant may submit an Alternative Plan, and they must do so by January 1, 2017 if they want to avoid preparing a GSP. The County requests that the Draft GSP Regulations be revised to include an exception from these requirements for GSAs managing low- and very low- priority basins that are electing to comply with SGMA.

3. **Clarify that a groundwater ordinance may be submitted for an Alternative Plan submitted under Water Code Section 10733.6(b)(1).**

Section 358.4(c)(1) requires that an Alternative Plan submitted under Water Code Section 10733.6(b)(1) include a copy of the applicable groundwater management plan. The County requests that the Draft GSP Regulations be revised to clarify that a copy of a groundwater ordinance may be submitted to satisfy this requirement. Water Code Section 10733.6(b)(1) allows for a plan developed “other law authorizing groundwater management” to be submitted as an Alternative Plan.

The County appreciates the opportunity to comment on the Draft GSP Regulations. The requested revisions will assist the County’s groundwater management efforts. Please contact Andy Horne, Deputy County Executive Officer, at (442) 265-1005, AndyHorne@co.imperial.ca.us, to discuss the requested revisions further.

Sincerely,



Ralph Cordova, Jr.
County Executive Officer

cc: Board of Supervisors, County of Imperial
Andy Horne, Deputy County Executive Officer
Katherine Turner, County Counsel
Jim Minnick, Director, Planning & Development Services