



# SAN JOAQUIN FARM BUREAU FEDERATION

MEETING TODAY'S CHALLENGES / PLANNING FOR TOMORROW

March 31, 2016

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

## **RE: Draft GSP Emergency Regulations**

Dear Ms. Bisnett:

The San Joaquin Farm Bureau Federation (SJFB) is a not for profit, volunteer based organization that has been dedicated to the protection and advancement of agriculture in San Joaquin County for over 100 years. Agriculture is San Joaquin County's leading industry and is valued at over \$3 billion dollars that our local economy depends on to provide the tax base and local jobs that improve the quality of life for our residents.

The San Joaquin Farm Bureau has been heavily engaged in the management of water resources within the County. The SJFB has served as an associate member of the Groundwater Banking Authority (GBA) since it's inception and also works closely with the individual districts within the basin to represent the needs of the agricultural community.

With the codification of the Sustainable Groundwater Management Act (SGMA) in 2014, we believe, as legislation clearly states, that management of water resources is best achieved at as local a level as possible.

After reviewing the Draft Groundwater Sustainability Emergency Regulations, we offer the following comments:

### **Use of existing data should be sufficient**

Existing data that is already accepted by the Department for monitoring groundwater elevations (CASGEM) should be readily accepted and incorporated in to Plans. Well density for monitoring purposes as well as the construction and design of the monitoring wells that is accepted for the purposes of CASGEM should also be accepted by Department for the purposes of determining groundwater elevations. This streamlines data collection which is not only more efficient, but also more effective in demonstrating historic trends in groundwater elevations which can assist Agencies in planning and management decisions.

We appreciate the Department's willingness to work with our SGMA Technical Advisory Group so that we can collaborate and share existing data sets as well as work towards a

Plan that will include the requisite elements without being duplicative in the efforts to collect and synthesize the data.

### **Coordinating Agencies should be locally determined**

SGMA was designed to allow public agencies to become groundwater sustainability agencies (GSA's). However, the emergency GSP regulations have now required that there be only one point of contact in each basin. We find that undermines local control in a manner that is inconsistent with SGMA.

The requirements of a new coordinating agency in §354.6 (d) which provide that the coordinating agency itself have the legal authority to implement the Plan are overly prescriptive. These are powers and authorities that clearly reside with GSA's themselves and this section must be modified to consider multiple GSA's that reserve these authorities individually and one plan that is then implemented by the GSA's.

Forcing the legal requirements of a new entity on existing districts and GSA's clearly undermines their ability to govern themselves. Furthermore, this effort is entirely unnecessary. Because GSA's will already be required to coordinate with other entities within the basin there need not be another agency to force this coordination.

Should a subbasin decide that compliance would best be facilitated through a new entity such as a JPA, it should be incumbent on the members of those entities to create a structure that will work locally for the GSA's and to determine the governance structure themselves.

Because the draft regulations provide for individual management areas, it would be logical to consider that those areas may not just be managed differently, but managed by a different GSA in coordination with the others.

### **Agencies should be allowed more time to correct deficiencies**

Under §355.2 (f)(2), Agencies may be allowed up to 180 days to correct any deficiencies in conditionally adequate plans. We don't feel as though this enough time to correct potential deficiencies. Considering the Department has up to two years to review a plan, we feel it is unreasonable to expect Agencies and their consultants a mere six months to work with the Department to understand and correct the deficiencies to make the Plan adequate.

Rather, it would be preferable to have agencies consult with the Department and establish reasonable timelines that are specific to the Agency, the subbasin, and the particular deficiencies. This method will further both the sustainability goal and empower local agencies to implement management actions within the basin.

We look forward to reviewing the revised version of these regulations and staying engaged in the process. Should you have any questions, please do not hesitate to contact the SJFB at (209) 931-4931.

Sincerely,

A handwritten signature in cursive script that reads "Andrew Watkins". The signature is written in black ink and is positioned above the printed name.

President