

DIRECTORS:

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J. BRETT MARYMEE
Solvang - Santa Ynez

Santa Ynez River

WATER CONSERVATION DISTRICT

P.O. Box 719 - 3669 Sagunto Street, Suite 108
Santa Ynez, California 93460
Telephone: (805) 693-1156

GENERAL

MANAGER:

BRUCE A. WALES

SECRETARY:

BRUCE A. WALES

CONSULTANTS:

ERNEST A. CONANT
General Counsel

STETSON ENGINEERS
Engineer

March 31, 2016

California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Attn: Lauren Bisnett, Communications Manager

Emailed to: SGMPS@water.ca.gov

RE: Comments on Draft Groundwater Sustainability Plan Emergency Regulations

Dear Ladies and Gentlemen:

We are writing to comment on the draft Groundwater Sustainability Plan Emergency Regulations released February 18, 2016 (draft Regulations).

Santa Ynez River Water Conservation District (SYRWCD) encompasses most of the Santa Ynez River Valley Groundwater Basin (Bulletin 118 Basin No 3-15, "Basin") and we are working with the other local agencies within the Basin to elect to be the Groundwater Sustainability Agency (GSA) for the Basin. For at least the last 37 years, we have had a formal monitoring program of groundwater levels and conditions within our boundaries, as documented through annual reports prescribed by Water Conservation District Law as a prerequisite to levying groundwater charges. Our Basin is of moderate priority and is not designated to be in critical overdraft. Aside from the current drought, it appears the Basin is in stable condition overall, without the presence of "undesirable results" as defined in the Sustainable Groundwater Management Act (SGMA).

To avoid providing repetitive comments, we incorporate by reference the comments submitted by the California Association of Water Agencies (ACWA) dated April 1, 2016, and by Brownstein, Hyatt, Farber, Schreck (Gary Kvistad) on behalf of Improvement District No. 1 of SYRWCD dated March 31, 2016. We provide our comments to supplement those comments and emphasize certain points.

As many others have noted, we are very concerned that the draft Regulations include requirements not provided by SGMA and that are overly prescriptive and burdensome. Examples include requiring detailed mapping, including de minimus extractors (§354.8(a)(5)), addressing land use

issues (§354.8(g)), requiring a hydrogeologic conceptual model with very detailed requirements (§354.14), requiring a formal water budget (§354.18), monitoring networks that are beyond what is customary, at least in our area (§354.32-40), and introducing the requirement for a “Coordinating Agency” or “Submitting Agency” (§357.4). These requirements and others, which are clearly beyond that provided by or contemplated by SGMA, will undoubtedly add millions of dollars of increased costs to SGMA compliance for our region, for no apparent purpose or benefit.

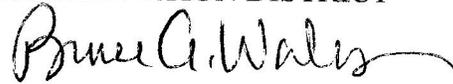
In particular, we emphasize our concern for the imposition through the draft Regulations of a “super agency” in each basin (Coordinating Agency or Submitting Agency), which is not envisioned or authorized by SGMA. Our Basin historically has been administered and recognized in published reports, including in DWR’s Bulletin 118, as at least three distinct sub-basins or portions. In working with the other local agencies in our Basin, we have planned on administering SGMA and managing the Basin in three GSPs, consistent with Bulletin 118 and as authorized by SGMA. The additional coordinating and centralizing requirements of the draft Regulations would impede and unnecessarily complicate the task before us.

We urge you to significantly revise the draft Regulations before finalizing.

Thank you for this opportunity to provide these comments.

Sincerely yours,

SANTA YNEZ RIVER WATER
CONSERVATION DISTRICT



Bruce A. Wales, Ph.D

General Manager