

KINGS COUNTY

Water Commission Meeting

John Howe - District 1

Mark Gilkey – District 2

Jim Verboon – District 3

Craig Pederson – District 4

Don Mills – District 5

Brian Ehlers - Member at Large

Harold Reed – Special District

John Gordon – City Rep.

Harlin Casida – City Rep.

Secretary: Gregory Gatzka

Staff: Chuck Kinney (559) 852-2674

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact Kings County Community Development Agency at (559) 852-2680 by 3:00 on the Friday prior to this meeting

REVISED AGENDA

REGULAR MEETING

Monday, November 25, 2013, at 5:00 P.M.

This regular meeting of the Kings County Water Commission will be held in the AG Commissioner's Multi-Purpose Room, 680 N. Campus Drive, Hanford, California.

The Kings County Water Commission requests that all cell phones and other electronic communication devices be muted or turned off while the meeting is in progress.

I. CALL TO ORDER - Chairperson

A. Roll Call of Water Commission Members: (*Gregory Gatzka- Secretary*)

B. Unscheduled Comments:

Any person may address the Commission on any subject matter within the jurisdiction or responsibility of the Commission at the beginning of the meeting; or may elect to address the Commission on any agenda item at the time the item is called by the Chair, but before the matter is acted upon by the Commission. Unscheduled comments will be limited to five minutes.

C. Approval of the Minutes of the August 26, 2013 meeting – *Chairman: call for motion, second and voice vote*

II. OLD BUSINESS - None

III. NEW BUSINESS

A. **KINGS RIVER INTEGRATED REGIONAL WATER MANAGEMENT PLAN** – Eric Osterling
Consider a recommendation to adopt the updated Upper Kings Basin Integrated Regional Water Management Plan.

1. Discussion

2. Action: Provide recommendations to the Board of Supervisors.

B. **STATE WATER BOARDS GROUNDWATER WORKPLAN**

Update the Commission on the Draft Groundwater Workplan Concept paper.

1. Discussion

2. Action: Provide recommendations to the Board of Supervisors.

IV. MISCELLANEOUS

A. Member comments:

B. Staff comments:

C. Correspondence:

V. ADJOURNMENT –

Next regular meeting is scheduled for February 24, 2014.

Agenda backup information and any public records provided to the Water Commission after the posting of the agenda for this meeting will be available for public review at Kings County Community Development Agency 1400 W. Lacey Blvd., Bldg. 6, Hanford CA, or can be viewed online at: www.countyofkings.com/planning/water_com.html .

KINGS COUNTY WATER COMMISSION MINUTES

DISTRICT 1
John Howe

DISTRICT 2
Mark Gilkey - Chair

DISTRICT 3
Jim Verboon

DISTRICT 4
Craig Pedersen

DISTRICT 5
Don Mills

MEMBER AT LARGE
Brian Ehlers – Vice Chair

**SPECIAL DISTRICT
REPRESENTATIVE**
Harold Reed

CITY REPRESENTATIVE
John Gordon

CITY REPRESENTATIVE
Harlin Casida

KINGS COUNTY

COMMUNITY DEVELOPMENT AGENCY STAFF: Greg Gatzka (559) 852-2682 Chuck Kinney (559) 852-2674

CALL TO ORDER: A regular meeting of the Kings County Water Commission (KCWC) was called to order by Chairman Gilkey at 5:00 p.m., on August 26, 2013. The KCWC meeting was held in the Multi-Purpose Room of the Administration Building (Bldg. No. 1), 1400 W. Lacey Blvd., Hanford, California.

Roll call of members was conducted by Secretary Gatzka, and a quorum of appointed Committee members were in attendance.

COMMITTEE MEMBERS PRESENT: Don Mills, Brian Ehlers, Mark Gilkey, John Gordon, Jim Verboon, Harlin Casida, John Howe

COMMITTEE MEMBERS ABSENT: Craig Pedersen, Harold Reed

STAFF PRESENT: Greg Gatzka - Director, Erik Kaeding – Deputy County Counsel, Chuck Kinney – Deputy Director - Planning, Terri Yarbrough – Executive Secretary

VISITORS PRESENT: Joe Neves, Mike Nordstrom, Courtney Espinoza, David Orth, Mario Santoya, Sharon Gordon, Dale Melville, Larry Spikes, David Kahn, Richard Valle

UNSCHEDULED COMMENTS: None

APPROVAL OF MINUTES: A motion was made and seconded (Gordon/Mills) to approve the minutes of the April 1, 2013 meeting. Motion carried unanimously with Pedersen and Reed absent.

OLD BUSINESS:

A. Irrigated Lands Regulatory Program – David Orth

Mr. David Orth provided an update on the Waste Discharge Requirements (WDR) Development Schedule for the Irrigated Lands Regulatory Program. He also provided updates on the membership, groundwater assessment report, monitoring program and cost to members. He reported that the South Valley is pursuing the third party application and that it is unclear how the coordination will take place among Third Parties in South San Joaquin Valley Water Quality

Coalition. The cost to members could change depending on how many growers sign up. He also reported that the State Water Resources Control Board will be adding four new employees who will be concentrating on monitoring in the valley for compliance.

B. Central Valley Salinity Alternative for Long-Term Sustainability (“CV Salts”) David Orth

Mr. Orth provided an update on the status for the Central Valley Salinity Alternative for Long-Term Sustainability (CV Salts). He stated that this is stake holder driven and monthly meetings have been held to discuss and study alternatives to sustain farming and community growth in the Central Valley. A regional management approach is being taken in hopes of finding some of the areas of vulnerability. Commissioner Verboon asked if sub regions would be looked at. Mr. Orth stated they were open and willing and that these studies will help. Environmental groups are concerned that this is a permit to pollute. The objective is to improve water quality without over regulating.

C. Upper Kings Basin Integrated Regional Water Management Plan – David Orth

Mr. Orth provided an update on the status of the Upper Kings Basin Integrated Regional Water Management Plan and gave an overview on projects. He reported that fifty agencies are now participating as members or interested parties.

NEW BUSINESS:

A. Tulare Lake Bed Municipal and Domestic Supply Beneficial Use (MUN) De-Designation –

Michael Nordstrom – Mr. Nordstrom provided an update on the efforts to remove the MUN designation from the shallow groundwater through the Central Valley Salinity Coalition. Commissioner Gordon asked if these studies will open the door for more ammunition for additional regulation down the road. Mr. Nordstrom stated that this should be a benefit to this area rather than creating more regulation. Mr. Dale Melville asked to have “up-gradient and further” in the second paragraph to be deleted from the draft letter.

A motion was made and seconded (Verboon/Mills) to recommend that the Board of Supervisors send the proposed letter of support, with changes recommended by Mr. Melville, proposing municipal delisting of the Tulare Lake Bed to the Central Valley Regional Water Quality Control Board as amended. Motion carried unanimously with Pedersen and Reed absent.

B. Draft Water Bond Framework

Mr. Mario Santoya provided an overview of the Water Bond history. He reported that the legislature is working to lower the cost of the bond and will remove funding for storage, Delta sustainability and funds for regional projects. A draft resolution was presented that would be brought before the Board of Supervisors. Mr. Santoya asked that the Commission recommend to the BOS that they approve this resolution which reaffirms previous efforts to increase supply storage, reliability and quality of water in California and specifically supports the Clean and Reliable Drinking Water Act of 2010.

It was recommended that the verbiage be changed from “regional infrastructure improvements and development” to “integrated regional water quality management” in item 4.

A motion was made and seconded (Mill/Ehlers) to recommend that the Board of Supervisors approve the resolution as amended. Motion carried unanimously with Pedersen and Reed absent.

MISCELLANEOUS

A. Staff Comments – None

B. Member Comments – None

- C. **Correspondence** – Information on a free training session for Pre-Planning and Legal Entity Formation Assistance Grant Program was provided.

ADJOURNMENT

The next scheduled regular meeting of the Water Commission is Monday, November 25, 2013 at 5:00 pm at the Ag Commissioners multi purpose room. The meeting was adjourned at 6:55 pm.

Respectfully submitted

KINGS COUNTY WATER COMMISSION



Greg Gatzka, Secretary

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Kings Basin Integrated Regional Water Management Plan



Adopted October 17, 2012

EXECUTIVE SUMMARY

Introduction

The Kings Basin Integrated Regional Water Management Plan (IRWMP) is a collaborative effort between 54 public, private and non-governmental agencies to manage water resources in the Kings Groundwater region (Kings Basin). The Kings Basin is a sub-basin of the San Joaquin Valley groundwater basin, within the Tulare Lake Hydrologic Region. The IRWMP region includes nearly all of the Kings Sub-basin and small portions of the Delta-Mendota, Kaweah and Tulare Lake Sub-basins.

Historically, water management in the Kings Basin was limited to independent operations by local water agencies and individual water users. Local agencies initiated a process of regional cooperation in 2001 and prepared an IRWMP in 2007. This regional effort continued to grow and evolved into the formation of the Upper Kings Basin Integrated Water Management Authority (Kings Basin Water Authority or Authority) in 2009. In 2012, the Authority included 17 official members and 37 interested parties. The 2007 IRWMP was updated to comply with new IRWMP standards established by the Department of Water Resources (DWR), describe the new governance structure, document changes in policies and procedure, and include information on new stakeholders and their input on water management issues. The region and its IRWMP were accepted by DWR during the IRWMP Regional Acceptance Process of 2009.

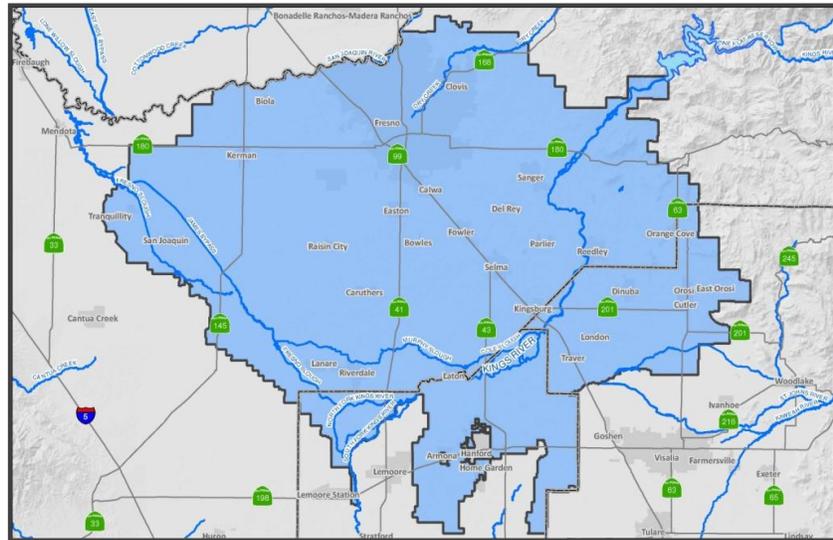
“The vision of the Kings Basin Water Authority is a sustainable supply of the Kings River Basin’s finite surface water and groundwater resources through regional planning that is balanced and beneficial for environmental stewardship, overall quality of life, a sustainable economy, and adequate resources for future generations.”

This updated IRWMP Planning horizon extends 20 years to the year 2032. By working with varied interests and needs, the IRWMP planning process has opened the doors to partnerships, funding opportunities, operational connectivity, and increased awareness of planning efforts and potential projects.

Region Description

The Kings Basin IRWMP covers 610,000 acres (953 square miles) and includes parts of Fresno, Kings and Tulare Counties. The IRWMP area also includes numerous cities, communities, water districts, irrigation districts, and special districts.

The region uses both surface and groundwater to meet water needs. The Kings River is the major source of surface water. Operation of Pine Flat Reservoir provides a facility to regulate the Kings River flows and provides storage, flood control, hydropower and recreational benefits. The San Joaquin River defines the northern boundary of the IRWMP region, and provides surface water to some areas in the northern portion of the Kings Basin.



Map of Kings Basin IRWMP Area

Much of the Kings Basin is developed for agriculture and wide varieties of crops are grown. Most crops require irrigation water during the dry season, and irrigated lands cover about 480,000 acres. An extensive network of canals is used to deliver water to agricultural lands and groundwater recharge facilities. The region is comprised of



Kings River

several major urban areas, including the Fresno-Clovis metropolitan area. The majority of the IRWMP area has been ecologically modified through urbanization and agriculture. The Kings River supplies the most prominent riparian and wetland habitat in the area, and provides the main corridor for fish and wildlife movements.

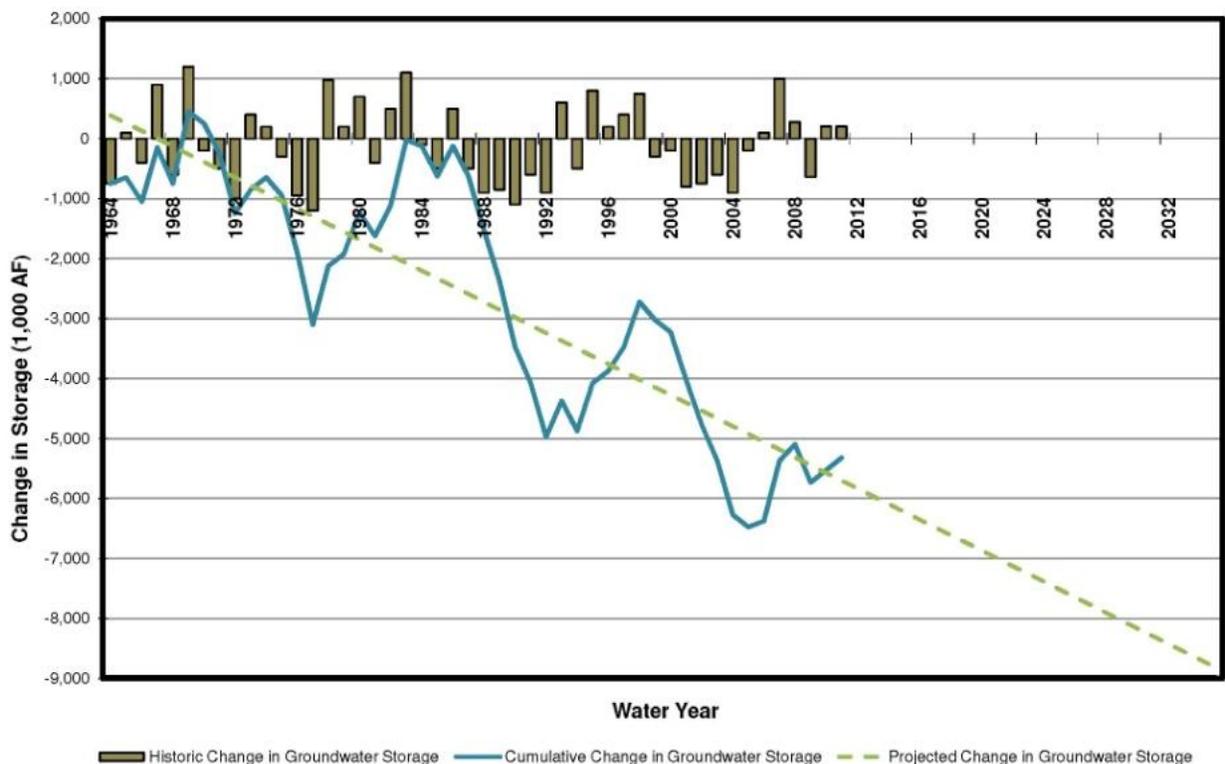
The IRWMP boundary is logical for regional management since the local agencies share the

same groundwater basin, use the same surface water sources and the stakeholders face similar water management issues and concerns (Chapter 3).

Water Management Challenges

The region faces many water management challenges including groundwater overdraft, surface water shortages in dry years, and groundwater quality problems in certain areas. Groundwater overdraft is generally considered the largest regional problem with the current plan area overdraft estimated to be 100,000 to 150,000 AF/year. The long-term decline in groundwater storage will be significant if current water management strategies are maintained. Correcting the overdraft through regional efforts will help lead to overall maintenance and improvement in the quantity, quality and cost of development of groundwater resources in the region.

Within certain areas of the region and for certain stakeholders, water quality and water



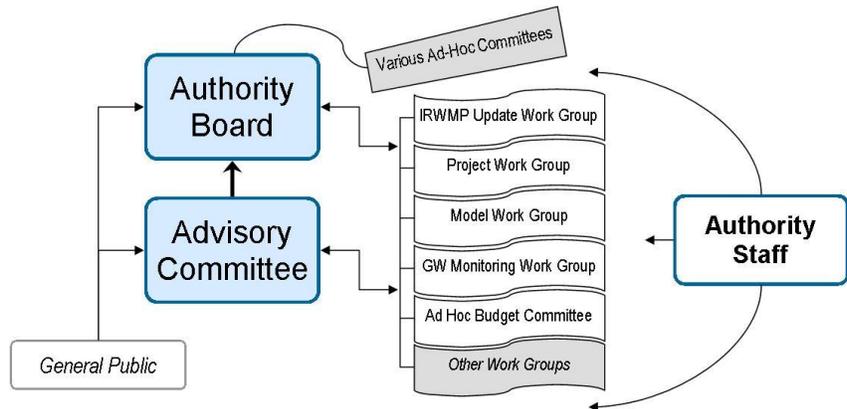
Historical and Projected Groundwater Level Decline

reliability are higher priorities than overdraft correction. Communities completely reliant on groundwater for drinking water purposes are experiencing an increasingly difficult time meeting drinking water standards. Improving and protecting water quality remains a significant challenge that can also benefit from regional and cooperative efforts.

The DWR established 16 IRWM Plan Standards (August 2010) that must be addressed in updated IRWMPs. These are addressed in separate chapters of the IRWMP and are summarized below:

Governance

The Authority is governed by a Joint Powers Agreement (JPA) made effective on March 1, 2009. The JPA formed a legal Authority that satisfies the definition of a Regional Water Management Group according to the California Water Code. Members must execute the JPA and pay an annual assessment. Interested parties can participate free of cost. The Authority is governed by a Board of Directors comprised of one representative from each Member agency. An Advisory Committee and numerous Work Groups provide advice to the Board of Directors and assist with IRWMP plan development, technical studies, project evaluation, and administrative efforts. The organizational structure provides balanced opportunities for stakeholder participation. (Chapter 2)



Joint Power Authority Organization Chart

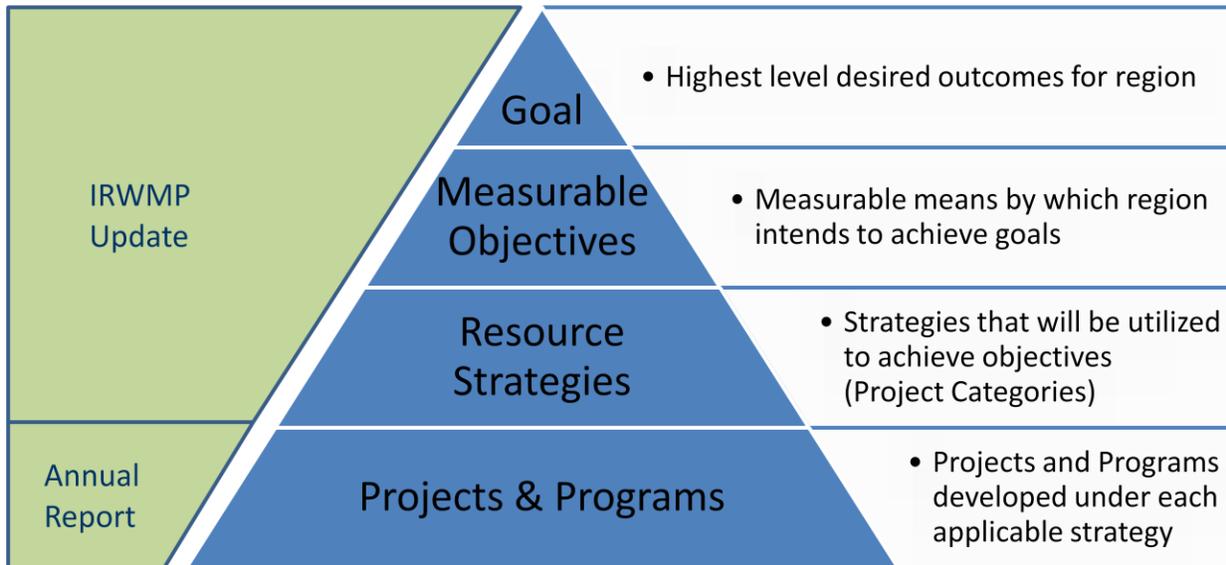
Disadvantaged Communities

A Disadvantaged Community (DAC) is a community with mean annual household income less than 80% of the statewide average. The Kings Basin includes approximately 90 unique DACs. Many of the DACs have critical water supply and water quality needs. Agriculture is a large sector of the economy in many DACs, and maintaining this economic base requires a reliable water supply. Water supplies are also needed to accommodate urban, commercial and industrial growth in DACs. A regional study on DAC water issues, to be completed in 2013, will engage DACs, identify water, sewer, and storm drain issues, and develop potential projects to address their water supply problems. (Chapter 4)

Goals and Objectives

The Authority developed regional Goals and Objectives to provide focus to their planning efforts. These Goals and Objectives consolidate urban, agricultural and environmental concerns. Goals are the highest level priorities, and objectives are more specific actions to meet the goals. The objectives can be accomplished through resource management strategies, projects and programs. The process to identify Goals and Objectives considered those developed in the 2007 IRWMP, the 2010 IRWMP Guideline requirements, and changed conditions within the basin since the 2007 IRWMP was adopted. The regional goals include: 1) reduce groundwater overdraft; 2)

increase water supply reliability; 3) improve water quality and drinking water reliability; 4) enhance flood protection; and 5) enhance ecosystems and the services they provide. Mitigating groundwater overdraft is generally considered the highest regional priority, but water quality and water reliability are higher priorities in some areas. Fifteen measurable objectives were identified to help meet the five goals. Each objective was assigned a metric so its progress can be measured. (Chapter 5)



Hierarchy of Goals, Objectives, Strategies and Programs

Resource Management Strategies

A resource management strategy is a category for a type of project, program, or policy that helps local agencies manage their water and related resources. This IRWMP evaluates 33 strategies listed in the 2009 California Water Plan Update, and ‘Drought Planning’, a strategy added by the Authority. The evaluations include a description of each strategy, current use and applicability in the Kings Basin, and constraints to development. The Kings Basin actively uses 27 Resource Management Strategies and therefore maintains a diverse and comprehensive water management portfolio. High priority strategies include urban and agricultural water use efficiency, conjunctive use, recycled municipal water, and urban runoff management. (Chapter 6)

Project Review Process

The Authority has a project review process to identify and rank potential projects for funding or inclusion in grant applications. The Authority calls for project submittals once a year to include in a regional list, but stakeholders can submit project descriptions at any time. The project description is reviewed for completeness and conformance to IRWMP objectives and goals. If a project meets those requirements, it is added to the list and then documented in an annual report. The list is prepared to help prevent

duplication, foster project integration, and encourage stakeholders to be prepared for grant solicitations. When funding opportunities arise the Authority notifies stakeholders. A Project Selection Panel (Panel) is formed to review potential projects. Stakeholders are invited to submit more detailed project information, and the projects are prioritized by the Panel. The Panel identifies the most promising projects for inclusion in grant applications. The recommended list then requires approval from the Advisory Committee and Board of Directors. (Chapter 7)

Impacts and Benefits of Plan Implementation

Historically, local water management, especially groundwater, was limited to independent operations by each overlying water agency. Regional water management planning enhances the local, fragmented approach with a more comprehensive and



Groundwater Recharge Basin in City of Clovis

cooperative methodology. Some problems, such as groundwater overdraft, can only be solved with regional cooperation. A comprehensive list of benefits and impacts from implementing the IRWMP were identified for the Kings Basin and surrounding IRWMP regions. The impact/benefit analysis can be used to prioritize goals, prioritize resource management strategies, set benchmarks for evaluating IRWMP performance, and identify potentially adverse impacts from implementation projects that are often overlooked. A benefit of the Plan's implementation is in measuring against a baseline for water supply and water quality to reconcile and measure regional project benefits with such baseline criteria over time. (Chapter 8)

Plan Performance and Monitoring

Stakeholders in the Kings Basin participate in various independent but related regional efforts to monitor surface water quality, groundwater levels, surface water flows, Kings River levees, and Kings River Fisheries. The Authority will prepare an Annual Report to document monitoring data and serve as a status report for the stakeholders, Board of Directors and the State. The report will summarize regional monitoring efforts, and document success in meeting IRWMP objectives, success in implementing projects, an

updated project list, proposed amendments to the IRWMP, and changes in governance, policies, and membership. (Chapter 9)

Data Management

The Authority has developed data management procedures to ensure the efficient use of existing data and accessibility to stakeholders. Existing data management includes groundwater levels by the Kings River Conservation District (KRCD), surface water flows by the Kings River Water Association (KRWA) and Friant Water Authority (FWA), and water quality by the Southern San Joaquin Water Quality Coalition. The Authority also maintains data on proposed projects in a database. The Authority previously developed a Data Management System (DMS) that it is not currently utilizing in anticipation of employing DWR's DMS once available. (Chapter 10)

Financing

The Authority requires funding for operations, IRWMP updates, regional technical studies, grant applications, and project implementation. The Authority's administrative and governance operations are funded by an annual dues payment by each member, thus ensuring on-going funds to keep the Authority operating. Numerous stakeholders also contribute by offering the use of facilities and volunteering time to operations and committees. Infrastructure projects are typically funded with project proponent funds and augmented with State or Federal grants and loans. The Authority tracks funding opportunities and shares the information with stakeholders. (Chapter 11)

Technical Analysis

The Authority prepared numerous studies to support the 2007 IRWMP. Topics covered include regional water supplies, water demands, hydrogeologic conditions, land use, and water quality. As a result, only a limited amount of new analysis was needed to update this IRWMP. The Kings Basin Integrated Groundwater and Surface Water Model (Kings IGSM or Model) is a regional model that simulates surface water and groundwater systems in the entire Kings Basin. The model was developed in 2007 and remains the primary analytical tool available to the Kings Basin. Prior model runs concluded that under current water management conditions groundwater levels will continue to decline. A simpler technique using a trendline was used to estimate future overdraft. Each year the Authority will compare the projected versus actual change in groundwater storage to monitor progress and refine long-term goals. (Chapter 12)

Relation to Local Water Planning

Local agencies have their own water planning documents that reflect their policies and goals. Local water plans include Urban Water Management Plans, Groundwater Management Plans, Water, Wastewater and Stormwater Master Plans, Water

Conservation Plans, Agricultural Water Management Plans, and General Plans. Water plans from the Member and Interested Party agencies were reviewed and sections of the IRWMP were updated based on information, issues, and potential solutions provided in the plans. The local planning documents are often a reflection of the goals, objectives, and strategies of the IRWMP. The Authority is comprised of many local leaders, city council members, county supervisors and water agency directors, which serve as a link between the IRWMP and local water planning efforts. The Authority believes that regional efforts lead to more effective and better informed local efforts. Regional planning can serve as a basemap or guideline for the entire region to follow in local water resources planning. (Chapter 13)

Relation to Local Land-use Planning

Local cities and counties manage land use according to General Plans and Municipal Service reviews. These documents were reviewed for consistency with the IRWMP and to incorporate local planning elements. The IRWM process provides many opportunities to collaborate and integrate with local land planners both at the city and county levels. Many general plans discuss integrated land use and water supply planning. However, many land use documents provide few, if any, details on regional overdraft, groundwater management, new water supply development, and impact on irrigation facilities. The land-use planning documents also have few details on how they plan to reach their water management goals. Several key approaches were identified to strengthen cooperation and communication with land-use planners. (Chapter 14)

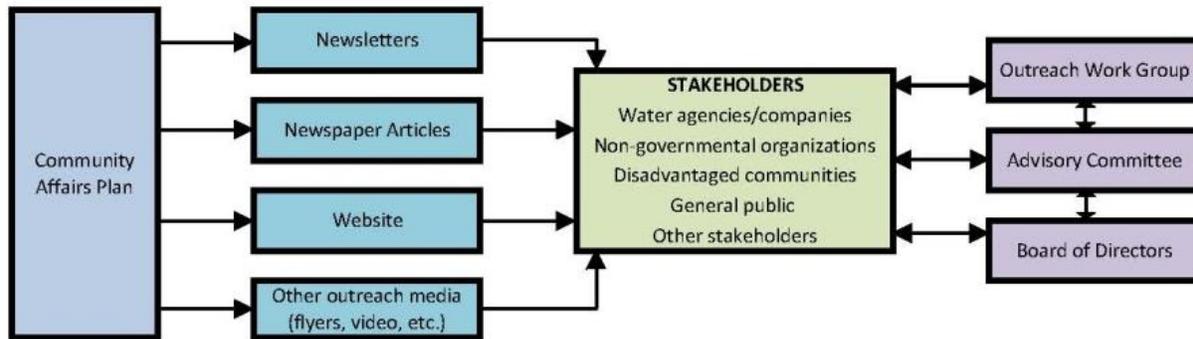


Local Recreational Area

Stakeholder Involvement

The Authority includes a diverse group of members and interested parties, which is the result of on-going public outreach efforts since 2004. Outreach efforts are led by an Outreach Work Group and follow a Community Affairs Plan, which is a living document and remains the backbone of the public outreach effort. Outreach methods include the

Authority website, newspaper articles, newsletters, e-mails, printed materials, speaker’s bureau, Advisory Committee, Work Groups, and Board of Directors meetings. Stakeholder involvement is considered fundamental to the success of the IRWMP, and outreach efforts will continue to educate current participants and seek new members and interested parties. (Chapter 15)



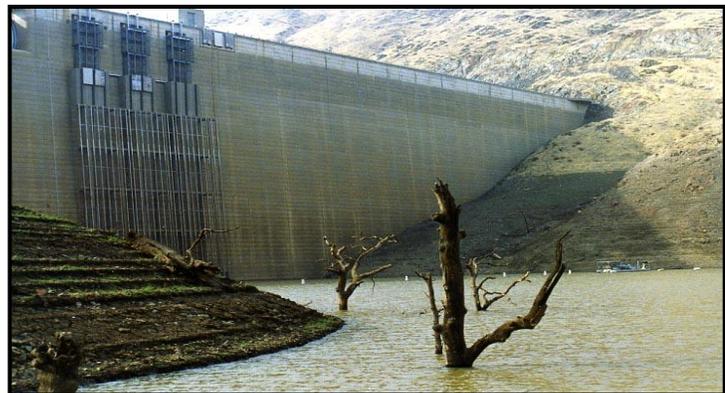
Stakeholder Involvement Process

Coordination and Integration

Coordination involves public outreach and facilitation efforts to bring stakeholders together and working as a unified group. Integration is defined as combining separate pieces into an efficient unified effort. These two IRWMP standards are closely related. The Authority’s governance structure fosters integration and coordination through the organizational structure, opportunities for participation, and a public outreach program. The Authority has an integrated process to solicit and review projects and promotes multi-agency efforts. Data management is integrated through regional monitoring efforts, an annual Kings Basin report, and a regional hydrologic model. The Kings Basin also communicates regularly with neighboring IRWMP groups and State DWR staff. (Chapter 16)

Climate Change

Climate change in the Kings Basin could impact precipitation patterns, and cause higher temperatures and earlier snowmelt. The area is especially vulnerable due to its dependence on mountain snow as a water supply. The IRWMP



Pine Flat Reservoir during Low Water Levels

includes a climate change vulnerability assessment for water supplies, water demands, water quality, flooding, ecosystems, and hydropower. Climate change adaptation will be accomplished through ‘no-regret’ strategies, which are actions that have benefits with or without climate change. The main strategies will include water conservation,

recycled water use, groundwater recharge, and increasing water storage capacity. (Chapter 17)

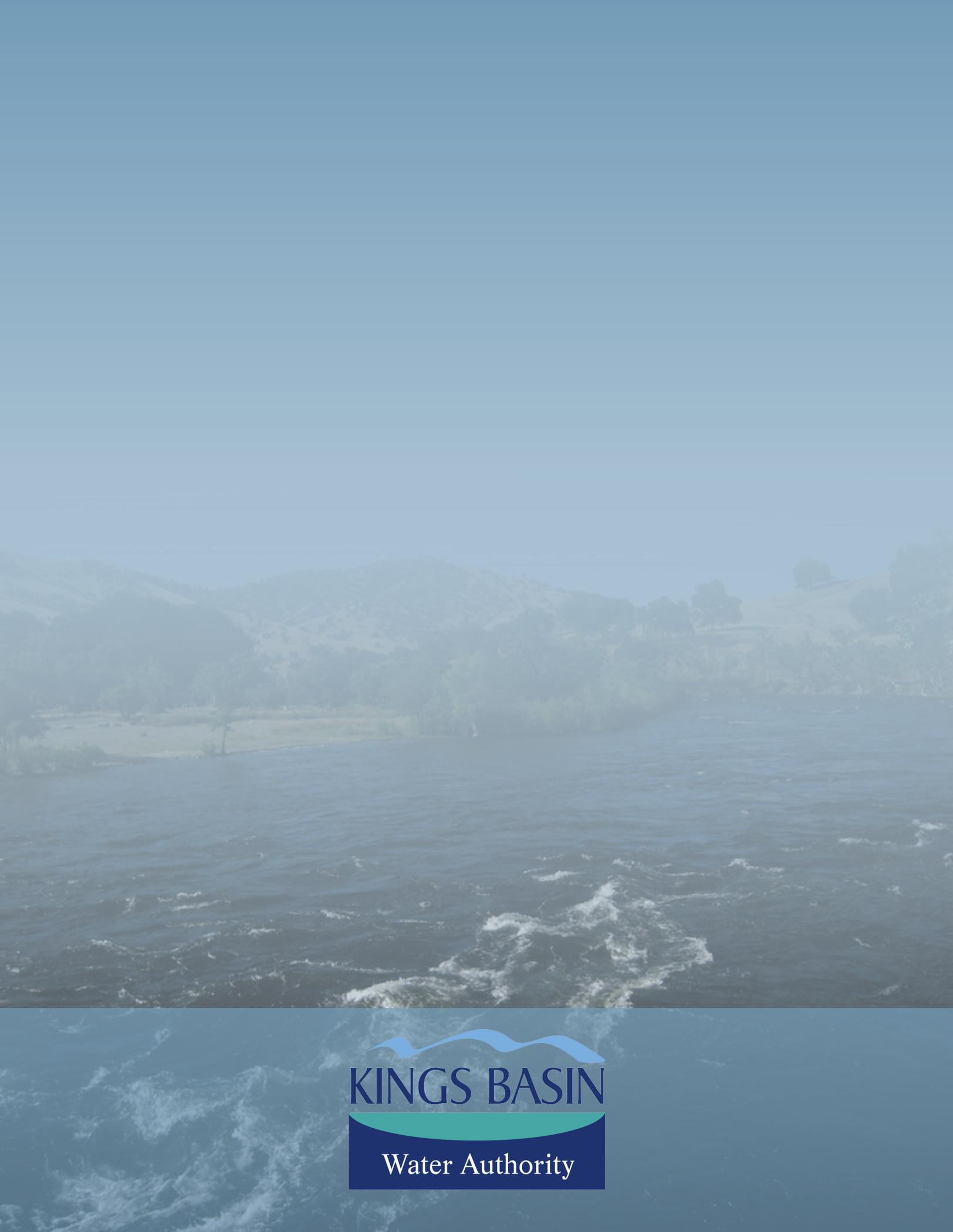
Kings Basin Water Authority

The Authority is an open organization and encourages participation from local water agencies, land-use agencies, industry organizations, non-governmental organizations, and individuals in the Kings Basin. The Authority's Advisory Committee meets every three months at the office of the Fresno County Farm Bureau.

Please contact Eric Osterling or Cristel Tufenkjian (KRCD) at 559-237-5567 or visit their website at www.kingsbasinauthority.org if you have any questions about the IRWMP or Authority, or would like to become a member or interested party.

Funding for updating the Kings Basin Water Authority IRWMP was in part provided by the California Department of Water Resources through a Proposition 84 IRWM Planning Grant.

Prepared by: 
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KINGS BASIN

Water Authority

BEFORE THE BOARD OF SUPERVISORS
COUNTY OF KINGS, STATE OF CALIFORNIA

* * * * *

IN THE MATTER OF AUTHORIZING
ADOPTION OF THE KINGS BASIN
INTEGRATED REGIONAL WATER
MANAGEMENT PLAN /

RESOLUTION NO. _____

Re: Revised Kings Basin IRWMP

WHEREAS, the Upper Kings Basin Integrated Regional Water Management Authority (also known as “Kings Basin Water Authority”) is a Joint Powers Authority organized in accordance with California law to pursue integrated regional water management planning strategies for the Kings Basin region; and

WHEREAS, the County of Kings is an Interested Party of the Kings Basin Water Authority; and

WHEREAS, in response to new integrated regional management planning standards and changed conditions within the Kings Basin, the Kings Basin Water Authority has revised and updated the Kings Basin Integrated Regional Water Management Plan (the “Kings Basin IRWMP”); and

WHEREAS, the State of California Department of Water Resources requires that organizations and agencies individually adopt the Kings Basin IRWMP to be eligible for Proposition 84 and Proposition 1E Integrated Regional Water Management grant funds.

NOW, THEREFORE, IT IS HEREBY RESOLVED as follows:

1. That the Board of Supervisors hereby affirms its support for and adoption of the revised Kings Basin IRWMP and shall support its continuing development and implementation.
2. That the Board of Supervisors hereby authorizes and directs the Community Development Agency Director or the Community Development Agency Deputy Director - Planning to take such further actions as they deem necessary or appropriate to implement the foregoing resolutions.

The foregoing Resolution was approved on a motion by Supervisor _____, seconded by Supervisor _____ at a regular meeting of the Kings County Board of Supervisors held on the 3rd day of December, 2013, by the following roll call vote:

AYES:	Supervisors
NOES:	Supervisors
ABSTAIN:	Supervisors
ABSENT:	Supervisors

Doug Verboon, Chairman
Kings County Board of Supervisors

IN WITNESS WHEREOF, I have set my hand this 3rd day of December, 2013.

Clerk of Said Board of Supervisors

DISCUSSION DRAFT

Groundwater Workplan Concept Paper

The Water Boards are developing a workplan that aligns its current groundwater protection efforts, the ongoing actions of other entities with groundwater management responsibilities, and potential actions that the Water Boards and other entities could pursue. The objective is to ensure that the Water Boards address the groundwater challenges that have the greatest potential to impact beneficial uses, focus limited resources on the most important groundwater problems, and facilitate more efficient local and regional groundwater management and provide support and oversight, where needed.

This concept paper proposes a workplan framework under which the Water Boards' groundwater activities would be organized. Whether implemented at the local, regional, or State level, the Water Boards believe that an effective groundwater management program generally requires five key elements to be in place: thresholds, monitoring and assessment, governance, funding, and enforcement. The State Water Board is interested in your thoughts on the relevance of the proposed framework for groundwater management as well as its applicability to groundwater-related programs statewide. For each element of the proposed framework, this concept paper lists existing actions and suggests potential future actions that the Water Boards and others could take as a starting point for discussion. Many additional recommendations for action have been published in a variety of reports which can be found under reference materials in the website below.

The State Water Board is interested in meeting with various interests to continue the dialogue on this proposed framework, and the combination of existing and proposed actions, in the coming months. For more information please visit our website at:

http://www.waterboards.ca.gov/water_issues/programs/groundwater/workplan.shtml.

1 Managing California's Groundwater – Regional Leadership

Successful groundwater management requires prevention and cleanup of groundwater contamination, maximizing opportunities to recharge high-use basins, and ensuring that pumping occurs at sustainable levels over the long-term. **We envision a future where well-equipped local and regional groundwater management entities use monitoring information and thresholds to manage and maintain groundwater of sufficient quality at sustainable levels over the long-term; and where local and regional management efforts are backed-up by State support and oversight, where needed.** In some cases, management will also involve treatment of groundwater at the point of extraction or use for drinking water purposes, while measures to prevent further contamination are taken and long-term cleanup actions are implemented to address legacy pollution.

2 Implementing the Vision

The Water Boards currently implement a number of successful programs aimed at preventing and cleaning up groundwater pollution, monitoring quality, and encouraging recharge. Additionally, the State Water Board has broad constitutional authority to prevent the waste and unreasonable use of the State's water resources (including groundwater). While California lacks a comprehensive State

groundwater regulatory program, local and regional management of groundwater basins does exist in much of the State. The nature of groundwater and its uses vary widely by area, as does the extent of control. As a result, groundwater management has largely evolved on an as needed basis in a decentralized manner across the State. In spite of this, local and regional groundwater management efforts have produced impressive results in many areas of the State. Groundwater recharge, conjunctive use and cleanup projects have extended local water supplies, and storm water capture and recharge programs are growing around the State.

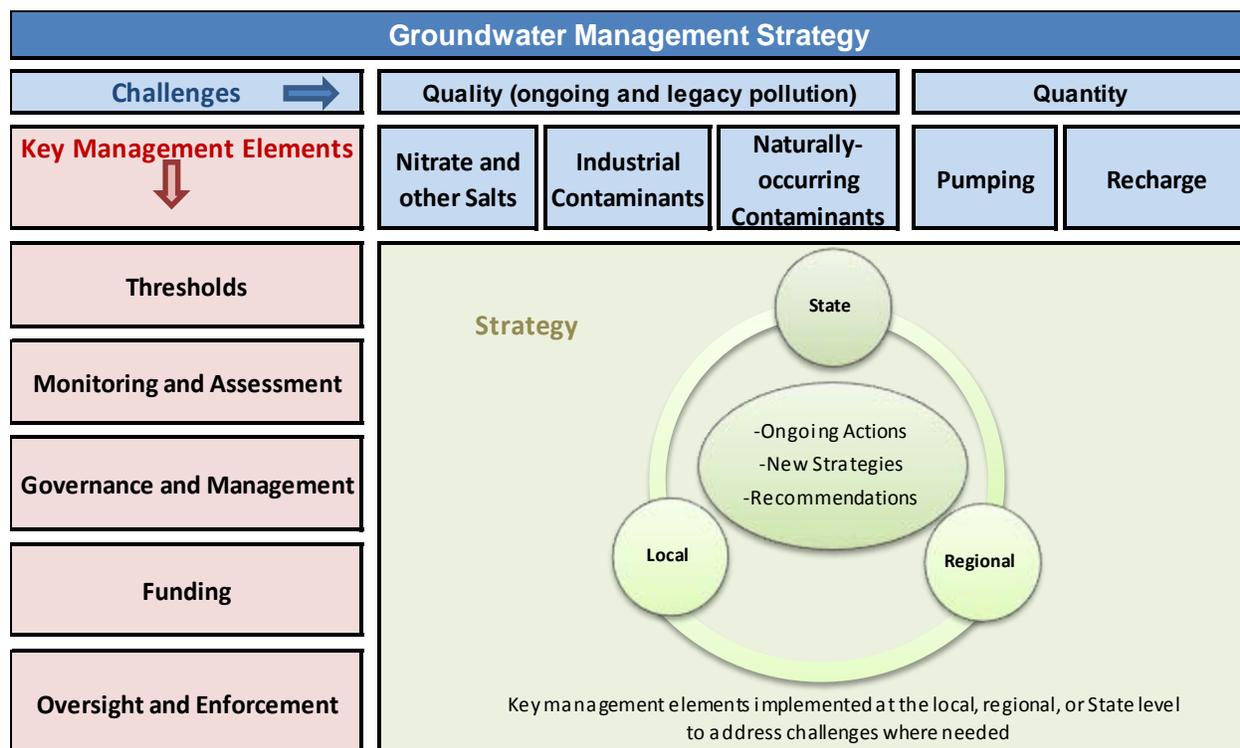
Effective groundwater management will ensure groundwater quality and quantity is maintained at sustainable levels that support beneficial uses of water over the long-term. Many of the most pressing challenges associated with groundwater quality can be broken down into three categories: (1) nitrate and other salts; (2) industrial chemicals; and (3) naturally-occurring chemicals. Nitrate and salt problems are generally associated with diffuse nonpoint pollution sources, such as agricultural drainage. Industrial pollutants typically originate from discrete point sources. Naturally-occurring chemicals are associated with geologic processes, and human activities often mobilize these pollutants into groundwater. Groundwater quality can also be impacted by pumping and declining water levels. In some areas, pumping may cause polluted groundwater or seawater to migrate or be drawn into areas that would otherwise not be impacted. The greatest challenge for groundwater quantity is overdraft leading to subsidence and the permanent loss of storage capacity. Managing groundwater levels (quantity) and preventing overdraft largely depends on maintaining a balance between the amount of pumping, natural depletion from a basin, and the amount of recharge. These challenges do not lend themselves to a “one size fits all” solution, given the varying physical and institutional characteristics of California’s groundwater basins. Therefore, an integrated approach to groundwater management is needed to ensure that appropriate action occurs at all levels of government.

Whether implemented at the local, regional, or State level, effective groundwater management generally requires that the following key elements be in place:

1. **Sustainable thresholds** for water level drawdown and water quality for impacted, vulnerable, and high-use basins;
2. Water quality and water level **monitoring and assessment**, and data management systems, capable of determining if thresholds are being met and evaluating trends;
3. **Governance** structures with the **management** mechanisms needed to prevent impacts before they occur, clean up contamination where it has occurred, provide adequate treatment of contaminated drinking water sources, and ensure that meeting groundwater level and quality thresholds are managed over the long term;
4. **Funding** to support monitoring and governance/management actions; and
5. **Oversight and enforcement** in basins where ongoing management efforts are not protecting groundwater.

This approach to groundwater management is scalable by design because each key management element can be established and implemented at the local, regional, or State level, or through a combination thereof. The Water Boards will focus attention and assistance on high-use basins where thresholds are being exceeded.

The figure below portrays the application of this management framework to groundwater quality and quantity.



3 Management Elements and Potential Actions

For each of the five key management elements needed for effective groundwater management, this section lists current Water Board and other agency/entity groundwater protection actions. Actions that the Water Boards or other agencies/entities *could take* in the future to enhance current efforts are then provided as a starting point for discussion. The Water Boards are soliciting input on the types of actions needed to ensure viable and effective groundwater management solutions, particularly in areas of greatest need.

3.1 Sustainable Thresholds

Various agencies, including the Water Boards, establish protective levels, or thresholds, that apply to groundwater. These thresholds include State water quality standards, and local or regional basin management objectives (BMOs), that are used for managing and assessing groundwater quality and quantity to support designated beneficial uses and ensure a sustainable groundwater water supply. Thresholds are an important component of groundwater management because they establish quantifiable triggers that, when approached or exceeded, signal a threat or problem. Approaching or exceeding a threshold may trigger management actions needed to address identified threats or problems. *The State Water Board is soliciting comment on whether the current and proposed actions will result in thresholds for groundwater quality and elevation that support assessment of groundwater conditions, evaluation of groundwater quality and quantity trends, and informed management decisions.*

*Nitrate Report Recommendation (http://www.waterboards.ca.gov/water_issues/programs/nitrate_project/docs/nitrate_rpt.pdf)

Existing THRESHOLDS	
Water Boards	<ul style="list-style-type: none"> • Water Quality Objectives in Basin Plans • Antidegradation Policy
Other State and Federal Agencies	<ul style="list-style-type: none"> • CDPH Maximum Contaminant Levels, Notification Levels, Response Levels, and Title 22 Water Recycling Criteria • OEHHA Public Health Goals • DWR Critical Overdraft
Regional and Local Entities	<ul style="list-style-type: none"> • Local Basin Management Objectives • Requirements for adjudicated basins (extraction and recharge measures)

3.1.1 Potential Water Board Actions

1. Clarify how the State Water Board's Antidegradation Policy (Resolution No. 68-16) applies to groundwater (including effects related to quantity, such as recharge).
2. Incorporate into Basin Plans thresholds for salt and nutrients contained in Salt and Nutrient Management Plans.
3. Summarize approaches taken towards basin management objectives (BMOs) in existing local groundwater management plans for application in high-use basins where objectives do not exist.

3.1.2 Potential Actions for Others

1. CDPH should complete the rulemaking for groundwater recharge with recycled water (indirect potable reuse).
2. The Legislature should require local groundwater management entities to establish thresholds for sustainable groundwater management in their local groundwater management plans and to report their progress.

3.2 Monitoring and Assessment

Groundwater monitoring and assessment evaluates current conditions, can be used to establish groundwater thresholds, and guides management decisions. Without sufficient monitoring, it is almost impossible to determine if groundwater problems exist or to forecast the potential for future problems that may warrant management actions. Many local, regional, and State agencies have statutory responsibility or authority to collect water quality and water use/level data and information; however, monitoring is inconsistent throughout the State, with significant regional variation in parameters monitored, monitoring frequency, and data availability. In spite of this diversity, there are excellent examples of groundwater monitoring programs now being implemented at the local, regional, and State levels. *The State Water Board is interested in understanding whether the existing and proposed actions will result in better integration and accessibility of existing groundwater quality and quantity data to support assessment of groundwater conditions, evaluation of groundwater quality and quantity trends, and informed management decisions.*

Existing MONITORING AND ASSESSMENT Activities	
Water Boards	<ul style="list-style-type: none"> • Groundwater Ambient Monitoring and Assessment (GAMA) Program • GAMA Priority (high-use) Basins Project (including mapped Priority Basins) • Hydrogeologically Vulnerable Area Mapping • AB 2222 Report to Legislature (Communities Relying on Contaminated Groundwater) • Central Coast Domestic Well Project • Central Valley Dairy and Irrigated Regulatory Lands Monitoring • Water Rights Groundwater Recordation Program (delegated to local agencies) • Define and identify nitrate high risk areas
Other State and Federal Agencies	<ul style="list-style-type: none"> • CDPH Drinking Water Program (monitoring of public supply wells, including consumer confidence reports prepared by public water suppliers) • DPR Ground Water Protection Program (pesticides sampling) • DWR California Statewide Groundwater Elevation Monitoring (CASGEM) Program • DWR basins in critical overdraft (Bulletin 118; 1980) • DWR Water Data Library (historical groundwater quality trend data, and CASGEM groundwater level data) • USGS National Water Information System (NWIS) (includes groundwater quality data collected under the GAMA Program) • NASA Central Valley Groundwater Elevation Study
Regional and Local Entities	<ul style="list-style-type: none"> • Groundwater recordation (Los Angeles, Riverside, San Bernardino, and Ventura counties) • Local agency monitoring for groundwater level as well as quality, and land subsidence in some regions

3.2.1 Potential Water Board Actions

1. **Add a basin assessment module to GeoTracker GAMA that provides publicly-accessible information on groundwater quality and is capable of analyzing trends in high-use basins.**
2. **Work with the Department of Conservation's (DOC) Division of Oil, Gas, and Geothermal Resources (DOGGR) on monitoring and assessment requirements for hydraulic fracturing, pending the outcome of proposed legislation.**
3. **Require groundwater level data coming to the State Water Board to be submitted directly to CASGEM.**
4. Require all groundwater quality data submitted pursuant to Water Board requirements to be in a format compatible with GeoTracker GAMA.*

3.2.2 Potential Actions for Others

1. **DWR could create a searchable electronic database to submit well completion reports and associated data.**
2. **The Legislature could expand the State Water Board's Groundwater Recordation Program, which requires reporting of groundwater pumping, to basins subject to critical overdraft.**

*Nitrate Report Recommendation (http://www.waterboards.ca.gov/water_issues/programs/nitrate_project/docs/nitrate_rpt.pdf)

3. **Complete CASGEM Program implementation, including: (1) statewide prioritization of basins; (2) conducting groundwater elevation monitoring in areas where voluntary monitoring is not occurring; and (3) identifying basins subject to critical overdraft.**
4. **Update assessments and develop projections on the condition of California's groundwater basins, based on current groundwater management practices.**
5. **Develop estimates of storm water capture and groundwater recharge potential, and a tracking database to inform water resource planning and permitting decisions.**
6. The Legislature should enact legislation that establishes a framework of statutory authority for the Water Boards, in coordination with other State and local agencies, to improve the coordination and cost effectiveness of groundwater quality monitoring and assessment, enhance the integration of monitoring data across departments and agencies, and increase public accessibility to monitoring data and assessment information.*
7. The Legislature should require State and local agencies to notify groundwater users in nitrate high-risk areas and recommend that the well owners test their wells to evaluate drinking water quality. The Water Boards, California Department of Public Health (CDPH), and local public health agencies will coordinate in identifying private domestic wells and small, unregulated water systems in nitrate high-risk areas.*
8. The Legislature should require property owners with either a private domestic well or other unregulated groundwater system (2 to 14 service connections) to sample their well and disclose its water quality as part of a point of sale inspection before property title transfer or purchase.*

3.3 Governance and Management

In vulnerable and high-use basins, groundwater management is necessary to ensure that thresholds for water quality and quantity are not exceeded. In some situations, actions are needed to avert potential problems or to rectify existing problems. Pollution prevention, which can help alleviate future impacts to groundwater, is the most effective and affordable form of groundwater quality control; however, once contamination occurs, more costly cleanup actions may be needed. Managing groundwater levels (quantity) generally requires maintaining a balance between pumping, natural depletion, and recharge at the basin scale over the long-term. Such a balance can effectively be achieved through conjunctive use, demand management (e.g., water conservation, reduced pumping), or a combination of both. Various local, regional, and State agencies, including the Water Boards, have authority and responsibility for managing and regulating groundwater. The ongoing actions of these agencies have proven effective in many areas, but additional management action and controls may be needed to address current and potential future challenges associated with groundwater quality and quantity. *The State Water Board is interested in understanding whether the existing and potential actions in this section will result in the sustainable management of groundwater quality and quantity in high-use basins.*

Existing GOVERNANCE AND MANAGEMENT Activities	
Water Boards	<ul style="list-style-type: none"> • Expert Panel review of agricultural nitrate programs • Onsite Wastewater Treatment Systems (OWTS) Policy • Low-Threat Underground Storage Tank (UST) Case Closure Policy

*Nitrate Report Recommendation (http://www.waterboards.ca.gov/water_issues/programs/nitrate_project/docs/nitrate_rpt.pdf)

	<ul style="list-style-type: none"> • Recycled Water Policy • Waste Discharge Requirements (WDR) Program • NPDES Storm Water Program (including LID requirements) • Recycled Water Permits • Irrigated Lands Regulatory Program (ILRP) • Confined Animal Facilities (CAF)/Concentrated Animal Feeding Operations (CAFO) Program • Land Disposal Program • Tank Tester Licensing Program • UST Program • Site Cleanup Program (SCP) • Department of Defense (DoD) Cleanup Program • Prohibitions • Water Rights Administration (subterranean streams and interconnected groundwater) • Aquifer Storage and Recovery (ASR) Permit • Evaluate WDRs to determine protectiveness of groundwater quality*
Other State and Federal Agencies	<ul style="list-style-type: none"> • DTSC Green Chemistry and Cleanup • DTSC/CalRecycle Solid Waste Landfill Program • DPR Pesticide Regulations • DOC Promulgation of Hydraulic Fracturing Regulations • USEPA Underground Injection Control Program • CDFA nitrogen mass balance taskforce*
Regional and Local Entities	<ul style="list-style-type: none"> • Local Oversight Program (UST, SCP) • Local and Regional Groundwater Management (ordinances, GWMPs, UWMPs, AWMPs, IRWMPs)

3.3.1 Potential Options for New Water Board Actions

1. **Expand the use of general orders to focus on high priority discharges to improve efficiency of regulation and better protect groundwater.**
2. **Prioritize cleanup cases based on threat and whether they are located in a hydrogeologically vulnerable area.**
3. **Focus regulatory activities to control discharges in hydrogeologically vulnerable areas that overlay high-use basins.**
4. **Work with DTSC to extend the cleanup oversight Memorandum of Agreement (MOA) between DTSC and the Water Boards for brownfields to include enforcement lead sites to align cleanup authorities with the type of contamination and route of exposure.**
5. **Incentivize permits to promote storm water infiltration and protect infiltrative capacity of hydrogeologically vulnerable areas.**
7. Continue to provide technical assistance for the CDFA's ongoing work with the University of California Cooperative Extension (UCCE) and other experts in establishing a nitrogen management training and certification program that recognizes the importance of water quality protection.*

*Nitrate Report Recommendation (http://www.waterboards.ca.gov/water_issues/programs/nitrate_project/docs/nitrate_rpt.pdf)

3.3.2 Potential Recommendations to Others

1. **Assess legal obstacles and associated liability for groundwater recharge with sources that contain low level contaminants.**
2. **Assist DWR in conducting an evaluation of local groundwater management programs in high-use basins and identify where gaps in control exist that should be addressed with further action and develop guidelines for best practices in groundwater management.**
3. **Enact legislation that would allow for the establishment of Active Management Areas with specific requirements governing the management of groundwater including withdrawal, use, storage and monitoring/reporting.**
4. **Create a standardized set of authorities that districts with groundwater management responsibilities could draw upon to effectively and actively manage groundwater.**
5. The Legislature should enact legislation to establish a framework of statutory authorities for CDPH, regional organizations, and county agencies to have the regulatory responsibility to assess alternatives for providing safe drinking water and to develop, design, implement, operate, and manage these systems for small DACs impacted by nitrate.*

3.4 Funding

Successful groundwater management requires access to sufficient funding for development and implementation of groundwater management plans, monitoring (e.g., statewide programs such as GAMA and CASGEM), facilities (e.g., drinking water treatment systems, groundwater recharge facilities, storm water capture, etc.), ongoing operation and maintenance of infrastructure, pollution prevention and cleanup measures, as well as oversight or enforcement, by local and regional management agencies. In many cases, management entities have the authority to assess fees to cover the costs of local and regional management. However, the authority to assess fees is often contingent on voter approval at the local level in conformance with Proposition 218 and, therefore, approval can be difficult to achieve. In addition to local revenue sources, significant funding for conjunctive use projects, groundwater recharge facilities, groundwater treatment and monitoring, and groundwater basin management activities has been made available through various water bond measures and both State and federal funding. *Please refer to the existing and potential actions in commenting on whether adequate funding will be available to implement the suggested management framework (developing thresholds, conducting monitoring and assessment, managing and controlling groundwater quality and quantity, and oversight/enforcement).*

Existing FUNDING Activities	
Water Boards	<ul style="list-style-type: none"> • Clean Water State Revolving Fund (CWSRF) Program • Small Community Wastewater Grant Funding • Small Disadvantaged Community Wastewater Technical Assistance • Underground Storage Tank Cleanup Fund (USTCF) Program • UST/Orphan Site Cleanup Fund (OSCF) • Replacing/Repairing/Upgrading Underground Storage Tank (RUST)

*Nitrate Report Recommendation (http://www.waterboards.ca.gov/water_issues/programs/nitrate_project/docs/nitrate_rpt.pdf)

	<p>Program</p> <ul style="list-style-type: none"> • Agricultural Drainage Loan Program (ADLP) • Agricultural Drainage Management Loan Program (ADMLP) • Nonpoint Source (NPS) Pollution Control Program • State Water Pollution Cleanup and Abatement Account (CAA) • Water Recycling Funding Program (WRFP) • Stormwater Grant Program • Seawater Intrusion Control Program • SRF and bond funding for storm water and groundwater recharge projects
Other State and Federal Agencies	<ul style="list-style-type: none"> • DWR Local Groundwater Assistance (LGA) Grant Program, Integrated Regional Water Management (IRWM) Grant Program, etc. • CDPH Safe Drinking Water SRF (for public water systems) • CDFA Fertilizer Research and Education Program (FREP) (funds studies on fertilizer use, plant nutrient efficiency, and nitrogen management) • DTSC Brownfields Loan Fund • USEPA Brownfields Grants Program • California Pollution Control Financing Authority (CPCFA) Brownfields Assessment and Redevelopment Program and California Recycle Underutilized Sites (CALReUSE) Program • USDA Rural Assistance Program for Drinking Water • CDFA mill fee collection for fertilizer research and education*
Regional and Local Entities	<ul style="list-style-type: none"> • General and Special District Fee Assessments

3.4.1 Potential Options for New Water Board Actions

None.

3.4.2 Potential Recommendations to Others

1. **Establish a funding source that also addresses liability for cleanup of contaminated sites where responsible parties are unavailable, unable, or unwilling to pay for cleanup.**
2. **Local and regional groundwater management agencies should assess fees, where needed, to cover costs of monitoring and managing groundwater.**
3. The Legislature should provide a stable, long-term funding source for provision of safe drinking water for small DACs.*
4. DWR should give preference in the Proposition 84 Integrated Regional Water Management (IRWM) Grant Program to proposals with IRWM Plans that include an evaluation of nitrate impacts, including the access of safe drinking water to small DACs, for areas that have been identified as nitrate high-risk areas.*
5. The Legislature should enact legislation that establishes a funding source for the State Water Board's Groundwater Ambient Monitoring and Assessment (GAMA) Program.*
6. Continue to increase access to safe drinking water funding sources for small DACs by streamlining funding applications, providing planning grants, and providing technical assistance.*

*Nitrate Report Recommendation (http://www.waterboards.ca.gov/water_issues/programs/nitrate_project/docs/nitrate_rpt.pdf)

3.5 Oversight and Enforcement

Oversight and enforcement encourages dischargers and groundwater pumpers to operate in a manner consistent with relevant regulations, plans, policies, and permits. To address violations of management plan provisions or regulatory requirements, federal, State, and local agencies provide oversight of pollution cleanup, and take enforcement actions of varying types and levels of stringency. Local and regional groundwater management entities may also need to take additional oversight actions when monitoring data demonstrate that thresholds are or will likely be exceeded within their jurisdictions. *The State Water Board, along with the Department of Water Resources and the California Department of Fish and Wildlife, can exercise, in varying degrees, constitutional and statutory authorities to protect the public trust, prevent the waste and unreasonable use of the State's water resources, and initiate actions to protect those resources. In addition to the actions suggested below, the State Water Board is soliciting input on whether these authorities should be integrated into its workplan for groundwater.*

Existing ENFORCEMENT AND OVERSIGHT Activities	
Water Boards	<ul style="list-style-type: none"> • Enforcement and cleanup of nitrate and industrial pollutants in high-use basins and in groundwater reliant areas • UST Fund Fraud, Waste, and Abuse Program • Waste Discharge Requirements enforcement • Underground Storage Tank (UST) Leak Prevention and Cleanup • Legacy Site Cleanups • Initiate adjudication to protect groundwater quality • Undertake proceedings to prevent waste and unreasonable use • Water Right Permit enforcement
Other State and Federal Agencies	<ul style="list-style-type: none"> • CDPH enforcement and oversight of public water systems • DTSC enforcement action for violations of hazardous waste requirements • DTSC site cleanups • USEPA enforcement for violations of federal Safe Drinking Water Act • Watermaster enforcement of adjudications
Regional and Local Entities	<ul style="list-style-type: none"> • CUPA enforcement activities of environmental and emergency management programs • Local agency enforcement of tank testing requirements, GWMPs, and groundwater monitoring, reporting, and pumping requirements

3.5.1 Potential Options for New Water Board Actions

1. Target groundwater quality regulatory program enforcement on legacy sites in hydrogeologically vulnerable areas.
2. Evaluate and report on the effectiveness of enforcement of well design and destruction standards to eliminate conduits for contamination.
3. Establish an interagency task force to improve the integration of agency authorities that could be used to address groundwater overdraft.
4. Use Porter-Cologne authority to order parties responsible for nitrate contamination to provide replacement water.*

3.5.2 Potential Recommendations to Others

None.

*Nitrate Report Recommendation (http://www.waterboards.ca.gov/water_issues/programs/nitrate_project/docs/nitrate_rpt.pdf)

**KINGS COUNTY
BOARD OF SUPERVISORS**

Kings Government Center
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RICHARD FAGUNDES, DIST. 5

December 3, 2013

Felicia Marcus, Board Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Sent via email and U.S. Mail

Dear Ms. Marcus:

I am writing on behalf of the Kings County Board of Supervisors to express our views on the State Water Resources Control Board's ("State Board") draft Groundwater Workplan Concept Paper ("Workplan"). Our comments are directed to the following three "key management elements" of the plan: oversight and enforcement, governance and management, and funding.

- **Oversight and Enforcement:** Kings County shares the State Board's concern for groundwater supply and quality, and agrees that more must be done to protect our state's groundwater resources. However, because groundwater is a highly local problem with no one-size-fits all solution, we believe that groundwater management should remain a function of local government. Because of the emphasis in section 3.5 of the Workplan on "Potential Options for New Water Board Actions," we are concerned that the Workplan represents a first step in a move away from local control of groundwater resources, a move against which we would caution.
- **Governance and Management:** To be sure, the state has a role to play in groundwater management, but rather than playing a regulatory role and establishing new "top-down" bureaucracies, the environment will be served best if the state plays a supportive role in groundwater management. To this end, we believe that section 3.3 of the Workplan contains positive proposals, including focusing regulatory activities, providing incentives and technical assistance to growers, assessing legal obstacles for groundwater recharge, evaluating local groundwater management programs, and creating a standardized set of authorities that local agencies can draw upon to manage groundwater resources. At the local level, we need the state to play a role in coordinating local activities; providing

education, financial incentives, and technical assistance to growers to help them incorporate best management practices into their business models; serving as a clearinghouse of technical information; and providing assessments of local activities that are designed to be helpful, and to provide nonbinding recommendations for improving groundwater management plans.

- **Funding:** To be effective in our management role, cash strapped local agencies require additional funding from the state. We therefore urge the State Board to provide more specific suggestions in the Workplan for making funding available to local governments. This funding needs to come not only in the form of competitive grants for devising new and innovative management strategies, but also in the form on ongoing appropriations to fund existing mandates and programs.

In summary, more needs to be done in California to protect groundwater resources. Local agencies should play a lead role in providing oversight and enforcement, and state agencies should provide coordination, support, and funding to help local governments fulfill this role.

Sincerely,

DOUG VERBOON
Chairperson, Kings County Board of Supervisors