



# Truckee Donner Public Utility District

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April 1, 2016

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

RE: Draft GSP Emergency Regulations Public Comment

Dear Ms. Bisnett

The local water and entitlement agencies in the Martis Valley Groundwater Basin (MVGWB) are committed to stewardship of the Martis Valley aquifer in a way that manages the basin within sustainable yield, complies with the Truckee River Operating Agreement (TROA), and complies with the Sustainable Groundwater Management Act of 2014 (SGMA).

The MVGWB is a healthy groundwater basin operating within its sustainable yield. This is supported by decades of scientific studies, including the recent US Bureau of Reclamations Truckee River Basin study that included a state-of-the-art groundwater model for the MVGWB, a Lawrence Livermore National Laboratory Radio Isotope Aging study, and projections on the impacts of climate change to the region's water supply through the end of the century.

*DWR Staff recently defined the requirements of an Alternate Plan under SGMA to be, essentially, the same as a Groundwater Sustainability Plan (GSP). Further, the GSP requirements are written for worst case basin conditions and not commensurate with the needs of currently stable conditions that exists in many basins statewide. The current requirements for a GSP are very complex and expensive and should only be applied to groundwater basins that are not operating sustainably.*

**Truckee Donner Public Utility District is requesting a revision to the GSP guidelines to consider the sustainability of a groundwater basin and to create an alternate GSP approach so that well managed, sustainable groundwater basins are not required to meet the requirements of a GSP designed for distressed groundwater basins.** This possible solution would address the inequity using the same GSP requirements for all groundwater basins and would avoid a wasteful and inappropriate use of public money.

The MVGWB already has a very complex and comprehensive regulatory framework that includes the federally enacted TROA, the Martis Valley Groundwater Management Plan (GMP), DWR's CASGEM, and local control. This framework, combined with minor enhancements of existing groundwater management, would have been an ideal candidate for an Alternative Plan, however, this option is not feasible solely as a result of DWR's requirements.

The MVGWB is not unique in its relative sustainability. There are other basins statewide that have been managed well. Typically, the managers in these basins met the expectations of AB 3030 and invested resources into prudent long-term planning for sustainability. The estimated cost to prepare a GSP - under the current draft guidelines - is approximately \$1 million, even with the existence of scientific work accomplished under AB 3030. It seems a poor investment of public money to force managers of sustainable basins to prepare GSPs to the same rigor as that of non-sustainable basins.

The Martis Valley basin is an ideal candidate for an Alternate Plan; however, the extensive plan requirements combined with the January 1, 2017 due date essentially eliminate this as a possibility. This current regulatory framework by DWR staff does not appear to be consistent with the intent of SGMA regarding Alternate Plans nor GSPs when applied to the many sustainable basins that exist in California.

Truckee Donner Public Utility District has worked extensively with the local agencies in the MVGB eligible to form a Groundwater Sustainability Agency - **Truckee Donner PUD, Placer County Water Agency, Northstar Community Services District, Placer County, Nevada County, and the Town of Truckee** - and, while we are committed to comply with SGMA, we are determined to protect our community from inappropriate and wasteful costs that would occur to comply with the current draft requirements for GSPs.

Please consider our comments and we are available to work with DWR Staff to help create tiered requirements for GSPs that are appropriate for the actual sustainability of a groundwater basin.

Sincerely,



Michael Holley  
General Manager

Cc: Trevor Joseph (DWR)  
Tony Firenzi (Placer County Water Agency)  
Mike Staudenmayer (Northstar Community Services District)  
Brett Story (Placer County)  
Amy Irani (Nevada County)  
Tony Lashbrook (Town of Truckee)