

Merced County Farm Bureau

April 1, 2016

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

Dear California Department of Water Resources,

Merced County Farm Bureau (MCFB) would like to submit comments to the official record regarding the Sustainable Groundwater Management Act Draft Emergency Regulations for Groundwater Sustainability Plans and Alternatives (Draft Regulations). MCFB is a non-profit organization that represents 1,200 farmers and ranchers on a variety of issues throughout the county.

As a farming and ranching community, Merced County is attune to the current water issues as we have been dealing with a multi-year drought equating to one season of a zero percent allocation for the eastern portion of our county and three of our four sub-basins deemed as critically overdrafted. Given these facts, we appreciate and support the “substantial compliance” that the Department of Water Resources (DWR) will use to review the Groundwater Sustainability Plans (GSP). Flexibility at the local level is vital to the framework as those implementing the GSP need to have room for adjustment. With this, we absolutely stress that this process be kept at the county level as the relationships will be the driving force in obtaining the sustainability that is mandated by 2040.

As outlined on page 3 of the Draft Regulations, when a sub-basin has multiple Groundwater Sustainability Agencies (GSAs) or GSPs involved in management, a Coordinating Agency is required to form and serve as the source of contact for the California Department of Water Resources (DWR). This seems to be an added step that can be corrected in a coordinated agreement by, among other methods, having a joint powers authority (JPA) or memorandum of understanding (MOU) between the GSAs or GSPs and appointment of an individual from the JPA or MOU as the sole point of contact for DWR.

In section, §354.34(c) Monitoring Network, the Draft Regulations state that a plan has the ability to incorporate information and monitoring data from a number of existing sources such as the Irrigated Lands Regulatory Program (ILRP). Merced County has two coalitions within our county boundaries, the East San Joaquin Water Quality Coalition and the Westside Water Quality Coalition, and feel there is a collective amount of established data that can be used for the purpose of the development and implementation. We support the ability to use such data moving forward. As the information received by DWR is intended to be posted online for public consumption, we request that DWR place measures to protect the privacy of individuals, families, and the community. There must be consideration placed on the fact that many in the

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rural parts of the state still lack adequate internet access, which we've seen firsthand in the IRLP annual reporting process.

Upon concise reporting expected of the GSPs, the regulations require certain minimum and measurable objectives to be supported by clear and convincing evidence. This is a new standard that should be introduced because of the unattainable means of this goal for DWR and the respective regional entities. Additional concern we have revolves around clarifying what quantifies the 2 year date (page 39) in order to evaluate a GSP; and does it begin on the submittal date or the approval date? Further, when does the 60 period begin?

As an organization, MCFB does not have the ability to form as a GSA; however the steps moving forward are of extreme importance to our members, therefore we have a concern and are interested in the formation, development, and implementation. We will continue to engage our local officials and leadership in this matter, but we feel it necessary to provide our concerns as representatives of the mission of MCFB and the leading industry in Merced County. Thank you for the opportunity to participate in the comment period.

Sincerely,

Breanne Ramos
Executive Director