



April 1, 2016

California Department of Water Resources  
Attn: Lauren Bisnett, Draft GSP Emergency Regulations Public Comment  
P.O. Box 942836  
Sacramento, CA 94236

Via email to: [sgmps@water.ca.gov](mailto:sgmps@water.ca.gov)

**Re: Draft GSP Emergency Regulations Public Comment**

Thank you for the opportunity to comment on the Draft Emergency Regulations for Groundwater Sustainability Plans and Alternatives under the Sustainable Groundwater Management Act (SGMA). We support and appreciate the efforts California Department of Water Resources (DWR) has put forth on the extensive efforts to solicit stakeholder input in the development of the regulations.

Sacramento Suburban Water District (SSWD) was formed in 2002 by the merger of two long-standing Sacramento-area water districts. Those districts historically relied entirely on pumped local groundwater as their water supply. SSWD is the largest groundwater pumper in the local basin, the Sacramento County portion of the North American Sub-basin. Beginning in the late 1990s, and continuing after SSWD's formation, SSWD began to invest roughly \$120 million of ratepayer funds in the infrastructure necessary for the acquisition of surface water supplies to stabilize the local groundwater and to create a conjunctively managed bank of in-lieu recharged water that could be used during dry years to drought-proof water supplies for District customers. During that time, groundwater levels in the basin, which had declined over several prior decades, have recovered significantly. In addition, through use of these significant investments, over the past decade SSWD has created approximately 180,000 acre-feet in banked groundwater over and above the District's obligations to the groundwater basin as determined by the Sacramento Groundwater Authority (SGA).

Since 1998, SGA has managed the basin so successfully, one of the authors of SGMA, Assemblymember Roger Dickinson, referred to the effective management instituted by SGA as a model for what was needed throughout the State of California. But implementing the proposed new regulations would place an extraordinary, onerous and costly new burden on those who are presently successfully managing the sustainable groundwater basin under north Sacramento County. The draft regulations unnecessarily go far beyond what is required in statute. As drafted, these regulations may actually



threaten successful basin management by creating an environment where numerous local pumpers must agree on how to divide the extraordinary new costs. Furthermore, there is no information available to suggest that implementing these costly new requirements will add any measure of improvement to the successful basin management now being implemented by many in California, including the SGA.

We understand that there are numerous locations in California where groundwater management is clearly not sustainable, and regulations must ensure those areas have a path to success. However, we strongly believe the DWR should recognize that groundwater is being successfully managed in many parts of the state, and ensure the adopted regulations do not interfere with that success. The District recommends that DWR adopt regulations that align with the general principles of the statute, and that it defer many of the details to the expertise of local Groundwater Sustainability Agencies (GSAs), such as SGA, as was contemplated in the Sustainable Groundwater Management Act.

The District completely concurs with comments submitted by SGA, including the detailed edits provided on the entire draft regulations by John Woodling, Executive Director of SGA, that were provided in their comment letter. We believe the SGA approach will result in enforceable regulations that clearly address problem areas in the state without placing undue and unnecessary burdens on areas that have already gotten it right.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert S. Roscoe", with a long horizontal flourish extending to the right.

Robert S. Roscoe  
General Manager

cc: John Woodling, SGA