



**Sacramento Groundwater Authority**  
*Managing Groundwater Resources  
in Northern Sacramento County*

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December 16, 2008

California-American  
Water Company

Carmichael  
Water District

Citrus Heights  
Water District

City of Citrus Heights

City of Folsom

City of Sacramento

County of Sacramento

Del Paso Manor  
Water District

Fair Oaks Water District

Natomas Central Mutual  
Water Company

Orange Vale  
Water Company

Rio Linda / Elverta  
Community Water  
District

Sacramento Suburban  
Water District

San Juan  
Water District

Southern California  
Water Company

Agricultural and  
Self-Supplied  
Representative

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, California 95814

Re: Periodic Review of Anti-Degradation Policy (Resolution 68-16)

Dear Ms. Townsend:

The Sacramento Groundwater Authority (SGA) appreciates the opportunity to submit the following comments on the State Board's consideration of whether the State's anti-degradation policy, Resolution No. 68-16, should be revised with respect to groundwater. SGA is a joint powers authority formed in 1998 to collectively manage the groundwater basin underlying Sacramento County north of the American River. SGA is governed by a sixteen-member board of directors, including representatives of every public water supplier and representatives for self-supplied and agricultural groundwater users. Collectively, these water suppliers provide a high quality and reliable water supply to over 500,000 people. More than half of this public water supply is provided by the underlying groundwater basin.

Over the decades since the adoption of Resolution 68-16, water professionals have become increasingly aware of the need to substantially increase the conjunctive use of surface water and groundwater as a means of improving water supply sustainability. This has become even more important with potential hydrologic variability resulting from climate change and the decreasing reliability of State and Federal water deliveries even in normal water years. Expanding conjunctive use capacity is a critical element to increasing water supply reliability and has been recognized as such by the California Water Plan.

A successful conjunctive use program relies on the ability to store water in an underlying groundwater basin when excess water is available and to recover that water from the basin when conditions are drier. The storage of groundwater can be achieved by either: 1) in-lieu recharge in which water demands are met with surface water and groundwater wells are shut off in wet periods, allowing the basin to recharge naturally; 2) infiltration in engineered spreading basins; or 3) direct recharge through injection wells. Unfortunately, much of the Sacramento Valley does not lend itself to the first two means of recharge. Much of the excess surface water is available during winter

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months when demand is at a minimum, so there is limited potential for in-lieu recharge. Additionally, much of the Valley floor is either overlain by finer-grained flood basin deposits, limiting the potential for recharge through infiltration basins, or is developed, as in the Sacramento metropolitan area, and land is not available for spreading. This leaves recharge through injection wells, also known as aquifer storage and recovery (ASR), as a necessary tool to conjunctively use available surface and groundwater resources.

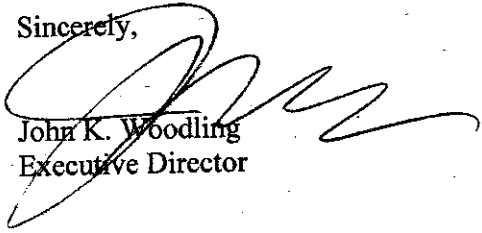
SGA has been tracking proposed ASR projects in the Central Valley and believes that Resolution 68-16, in conjunction with the basin's water quality objectives, such as the narrative toxicity standard, has been a significant impediment to evaluating and implementing ASR throughout the region. Specifically, the treatment of potable water supplies as subject to waste discharge requirements has been a concern to many basin managers as this water meets all criteria for being protective of public health. The narrative toxicity criteria being applied to individual constituents in the injection water are not consistent with recognizing the potential benefits of these projects. Additionally, this is inconsistent with many remediation projects overseen by Regional Board staff where cleanup of contaminants in groundwater is often only regulated to the maximum contaminant level (MCL).

SGA's interest is in sustaining healthy groundwater basins in California for our present and future generations. We recognize that there are significant issues that could emerge from the mixing of certain recharge and receiving waters and that various reactions under subsurface geologic conditions can also occur that could have negative impacts. Each proposed project should be evaluated on site specific conditions and monitored during its operation. The overall benefits and impacts of the project should be considered, rather than judging a project based on comparison to individual constituent concentrations.

While Resolution 68-16 has served the people of California well in the 40 years since its adoption, SGA believes that further guidance should be developed in its implementation to account for the many technical and policy issues that have emerged since that time. In particular, policies should seek to encourage expanding conjunctive use operations as a critical means of ensuring the maximum sustainable water supply benefit the people of the State. The amendment of Resolution 68-16 provides an opportunity to recognize the fundamental reality that recharge of aquifers with water meeting all standards for drinking water is generally in the interests of local citizens and the people of California.

Thank you for the opportunity to comment. Please feel free to contact me at (916) 967-7692 if you have any questions regarding our comments.

Sincerely,



John K. Woodling  
Executive Director