NCWA
Northern California Water Association

To advance the economic, social and environmental sustainability of Northern California by enhancing and preserving the water rights, supplies and water quality.

April 29, 2016

Sarah Sugar
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000

Sent via email to Sarah.Sugar@waterboards.ca.gov

Re: Comment Letter – Groundwater Recharge

Dear Ms. Sugar:

The Northern California Water Association (NCWA) appreciates the State Water Resources Control Board (SWRCB) convening a staff workshop and evaluating the effectiveness of recent efforts to facilitate groundwater recharge in California.

The SWRCB effectively processed several important recharge projects this year in response to the Governor's Executive Order. It should not, however, require an Executive Order to motivate these types of projects and a streamlined process to implement these projects on the ground. The California Water Action Plan and state policy are very strong and clear on the importance and value of groundwater recharge and the conjunctive management of surface and groundwater. The drought over the past several years has also served as a reminder about the importance of fully utilizing water when it is available for use at a later time when it is needed. We are hopeful that this strong policy framework coupled with a compelling hydrologic basis for such projects will motivate the SWRCB to advance a more concerted effort to facilitate active recharge opportunities (both temporary and permanent) and implement this policy in an affordable and effective manner throughout California.

In the Sacramento Valley, water resources managers are continually exploring new and innovative ways to serve water for multiple beneficial uses, including cities and rural communities, farms, birds along the Pacific Flyway, fish and recreation (see attached). As we look forward, the conjunctive management of water resources will be increasingly important in all year types to serve these multiple beneficial purposes in an effective manner.

For context, the ability to divert surface water from river and stream channels and spread it out across farmland, ditches, refuges and managed wetlands in the Sacramento Valley helps provide water for multiple beneficial uses. In addition to economic benefits, the water creates surrogate wetlands that provide habitat for birds and other species using the Pacific Flyway. By spreading water out on these surrogate wetlands, the water is able to absorb sunlight, turning the sun's energy into food for fish, birds and other species. At the same time, spreading this surface water across the land allows it time to percolate and recharge groundwater, which is an important element for groundwater sustainability under the Sustainable Groundwater Management Act (SGMA). Water resources managers throughout the Sacramento Valley are partnering with conservation partners and federal and state agencies to advance these types of programs. We would appreciate the SWRCB's support for these efforts.

I. State Policy Strongly Encourages Groundwater Recharge and Conjunctive Water Management

State policy is very clear and direct in the importance and value of groundwater recharge and conjunctive management of surface and groundwater resources. A summary of these policies is attached.

II. Yolo County Water Management

The Yolo County Flood Control and Water Conservation District (District) is a progressive statewide leader in conjunctive water resources management for the benefit of the natural environment and working rural landscape in Yolo County (See www.ycfcwcd.org). We appreciate the efforts by the SWRCB to provide a temporary permit for the District to divert more than 11,000 acre-feet that was recharged for the benefit of Yolo County. From our perspective, there is an opportunity to learn from this process and further streamline the SWRCB process to advance these types of projects in other parts of the Sacramento Valley and the State. The experience with the District has revealed many features, but most notably the unique nature of each proposal and how the SWRCB can provide flexibility to optimize the water resources while protecting other water rights and fish and wildlife.

We appreciate the SWRCB's efforts to advance groundwater recharge opportunities and we look forward to working with you in future endeavors. Please let us know if you have any questions or would like to discuss this further.

Sincerely yours,

David J. Guy
President

cc: Gordon Burns, Undersecretary
SWRCB Members
Tom Howard
Tim O'Halloran

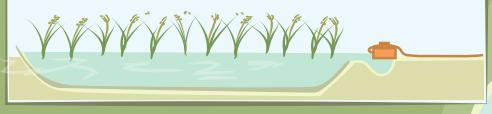
Accounting for every drop.

Water management in the Sacramento Valley.

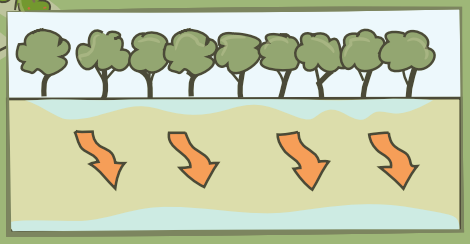
In the Sacramento Valley, a highly efficient "flow-through" system allows water to move from mountains to ocean. Water resources managers work with the Valley's unique topography, geology and hydrology to gather, use and reuse this precious resource.

This system is the heart of the Valley's healthy ecosystem, diverse economy and rich recreational opportunities.

Rice is grown on dense clay soil which prevents seepage and ensures water is available for re-use downstream.



The water not used in one district is a source of water for others down-stream.



All water not used by crops and wetlands returns to the river or percolates down to groundwater, recharging Valley aquifers.

This flow-through system works well. Natural vegetation, birds, fish, crops and people require a portion. The rest flows to the delta.

The Sacramento River and its tributaries are the prime sources for this system. They also gather water from irrigation and wetlands to reuse downstream.

Information compiled by
Northern California Water Association and
California Rice Commission.

Facebook.com/SacValleyCA

Active management of the Sacramento Valley's flow-through system ensures that the water we need and the benefits we enjoy will continue to be available.

The Sacramento Valley

Like a human fingerprint, California's Sacramento Valley is truly unique. On the leading edge of ecological and economical sustainability, it's also an **exceptional** place to live, work and raise a family. The Sacramento Valley joins together a world renowned mosaic of natural abundance: productive farmlands, wildlife refuges and managed wetlands, cities and rural communities, and meandering rivers that support and feed fisheries and natural habitats. Through **efficient** management of the region's water resources, the Sacramento Valley will continue to provide what's **essential** to California's future success and prosperity. Nourishment and sustenance from the fields, habitats for fish and wildlife, recreation and a special quality of life—the Sacramento Valley is home to all of this, and more…

State Policies Regarding Groundwater Recharge

"It is hereby declared that because of the conditions prevailing in this State the general welfare requires that the water resources of the State be put to beneficial use to the fullest extent of which they are capable, and that the waste or unreasonable use or unreasonable method of use of water be prevented, and that the conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare." (California Constitution Art. X, §2.)

"The administration will work with the Legislature to discourage actions that cause groundwater basin overdraft and provide incentives that increase recharge. State agencies will work with tribes and federal, regional and local agencies on other actions related to promoting groundwater recharge and increasing storage, including improving interagency coordination, aligning land use planning with groundwater recharge, and identifying additional data and studies needed to evaluate opportunities, such as capturing and recharging stormwater flows and other water not used by other users or the environment." (California Water Action Plan, p.14.)

"To demonstrate the feasibility of projects that can use available high water flows to recharge local groundwater while minimizing flooding risks, the State Water Resources Control Board and California Regional Water Quality Control Boards shall prioritize temporary water right permits, water quality certifications, waste discharge requirements, and conditional waivers of waste discharge requirements to accelerate approvals for projects that enhance the ability of a local or state agency to capture high precipitation events this winter and spring for local storage or recharge, consistent with water rights priorities and protections for fish and wildlife." (Governor's Executive Order B-36-15.)

"Sustainable groundwater management in California depends upon creating more opportunities for robust conjunctive management of surface water and groundwater resources. Climate change will intensify the need to recalibrate and reconcile surface water and groundwater management strategies." Furthermore, the Legislature expressed its intent "to increase groundwater storage and remove impediments to recharge." (SGMA, Water Code §10720.1)(g).)

It is the intent of the Legislature "to increase groundwater storage and remove impediments to recharge." (Water Code §10720.1(g).)

A Groundwater Sustainability Plan shall include…"(e) Replenishment of groundwater extractions [and](f) activities implementing, opportunities for, and removing impediments to, conjunctive use or underground storage." (Water Code §10727.4(e) and (f).)