

April 28, 2016

State Water Resources Control Board  
Division of Water Rights  
PO Box 2000  
Sacramento CA 95812-2000

Attention: Sarah Sugar

Subject: Comments on Recharge Workshop

Dear Ms. Sugar

Thank you for hosting the workshop on recharge this past Tuesday and thank you also to the two project proponents for their presentations and comments. Below, I re-iterate several comments made at the workshop. My comments reflect a perspective of having dealt with these issues on similar projects and planning processes in the Pacific Northwest for over 20 years. Over the immediate short term, I would recommend limiting changes to the fee structure and permitting process (i.e. keeping the current temporary measures in place now) and initiating a “task force” or advisory committee to consider the issues described below. The committee should include local stakeholders and technical experts that can evaluate and consider these issues in some detail.

1. GSA/GSP Integration. This needs to be considered in developing a more comprehensive program for permitting groundwater recharge. The upcoming GSP development process will undoubtedly identify a multitude of groundwater recharge opportunities and clear guidance on permitting requirements and costs will be essential. To the extent possible, local participation and collaboration with GSA’s on both the fee structures and the actual permitting will be the best way to encourage these types of projects as part of achieving groundwater sustainability the under the SGMA.

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2. Co-mingling of surface/ground water and beneficial use. This is a complex issue from a monitoring and legal perspective. Evaluating the spectrum of issues on every potential project will drain resources of both project proponents and permitting agencies. Here again, the local GSA/GSP process should help the State establish criteria for evaluating, permitting and monitoring projects that can be implemented to the highest benefit of each groundwater basin.
3. Availability/delivery of surface water flow for recharge. This is a complex issue from an ecological and operational perspective and, similar to co-mingling, has possible resource ramifications for both proponents and agencies. Providing effective guidance or thresholds that acknowledge local conditions and uncertainties involved in integrating these systems is the best way to encourage the development of a comprehensive recharge program.

Thank you for the opportunity to comment. Please feel free to contact me if you have any questions.

Sincerely,



Robert Anderson  
Senior Principal

