



March 28, 2016

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

RE: Draft GSP Emergency Regulations Public Comment

Dear Ms. Bisnett:

Thank you for the opportunity to submit comments on the California Department of Water Resources' (DWR) Sustainable Groundwater Management Act draft Emergency Regulations for Groundwater Sustainability Plans and Alternatives (draft Regulations). The City of Lincoln is supportive of the statewide goal of sustainably managed groundwater basins and recognizes its importance as a foundation to a sustainable water supply.

The draft Regulations will require considerable effort regardless of basin health to be completed in the format required. More specifically, the draft Regulations do not recognize existing agency efforts and investments in the effectively managing local groundwater resources. There is no relief from the level of effort by those existing management agencies whose basins are stable. As such, the City is requesting that DWR create the regulations in a similar format as the Basin Boundary Modifications regulations that sets forth significantly reduced reporting requirements for a basin that has been managed sustainably over the last 10 years.

A tiered approach should be considered, such as:

- 1) Minimum GSP Level: For Groundwater Sustainability Agencies (GSAs) where the groundwater levels have remained stable in 90 percent of the CASGEM wells over the last 10 years (2004 through 2014).

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- 2) Moderate GSP Level: For GSAs where groundwater levels have been stable 2004 to 2010 then declined through the drought (2010 through 2014).
- 3) Full GSP Level: For GSAs where groundwater levels declined through the entire 10 year period (2004 through 2014).

The City, and our partners in the basin, have been actively implementing our groundwater management plan for over 10 years which has included significant investments in monitoring well construction, groundwater level monitoring, and basin modeling.

Through these efforts the basin underlying the City, and essentially the entirety of Placer County, has remained stable and well managed. Without even considering the historic investments made over the past decade, or the on-going commitments needed to continue our success, we anticipated the City and its partners would need nearly \$2 million of additional investment to develop the required GSP (a portion of this cost being attributed to potential replacement of existing monitoring wells to meet standards set forth in the draft Regulations). **The proposed regulations should not require such significant additional expenditures in basins that have already been proven to be stable.** A tiered approach would help to address this significant problem with these draft Regulations.

Should you have any questions or if you require additional information, please do not hesitate to contact me at (916) 434-2450.

Sincerely,



Jennifer Hanson
Public Services Director