

Groundwater Sustainability Plan
Draft Regulations

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SUSTAINABILITY PLAN
REGULATION COMMENT
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Via e-mail to: sgmps@water.ca.gov

Subject: Draft GSP Emergency Regulations Public Comment / Reporting Solution

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Both the Plan(s) and Bulletin 118 will eventually be ironed out. A key component to the Plan that seems to get washed out in the volumes is **Managing Resources**. Water Conservation, Environmental and Yield Expectations are certainly the most important desired outcomes of the Plan(s). Those three measurements define a Sustainable Groundwater Plan.

The "real work" will be collecting, cataloging and responding to field data to eventually determine (scientifically) what a sustainable basin actually is. Reaching high yields expectations and conservation goals through best management practices is best met with technology that exists, is accurate and also can be used by both public and private parties. Similar to the well-run California Irrigation Management Information System (CIMIS) that collects and distributes regional weather data, a viable solution to gather and disseminate water use data should be considered.

Wells on private property can easily collect pump water data and transmit accurate information to the *Appropriate Flow Data Collector*:

- 1) A GSM
- 2) A Pump Owner
- 3) Third Party Operators
- 4) A Water Agency
- 5) A State Agency

Management is much easier to accomplish if data is collected and analyzed; monthly, weekly, daily or by the hour as the Water Board is requiring. Similarly, this can be done with surface water flows in addition to pumps, also.

Existing technology reads flow data -- and as a bonus Yield and Conservation-minded attributes such as University tested soil moisture equipment, filters that flush on demand as opposed to time-based, and even on-farm weather station data localized to a very small area integrate easily to a Platform. The beauty is the the Information can be collected quickly from industry standard equipment and only the flow data sent to the *Appropriate Flow Data Collector* while the Farm Manager can utilize the agronomical data on the same network.

Sharing this technology that focuses on data without strings of high-cost fees and the handcuffs of "new technologies" is easy to demonstrate in California and throughout the irrigated world. What about small land owners? Third-Party water managers can collect that data, thus reducing overhead burdens for absentee and/or low technology growers. This amounts to a new private sector business creation.

I would suggest 5-10 years of anonymous data reporting, non-punitive, and allowing the grower to piggy back her/his technologies needs to meet crop production conservation targets. This technology fits well with the **AG 2 TECH** programs being facilitated by Counties and at Community Colleges to take agriculture workers out of the field and into the farm managers office.

You are invited to tour locations with us. My contact information is shown above. Thank you.