

Town Council

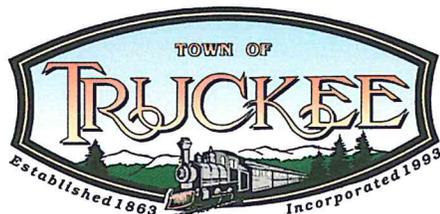
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April 1, 2016

California Department of Water Resources
Attn: Lauren Bisnett, Public Affairs Office
P.O. Box 942836
Sacramento, CA 94236

RE: Draft GSP Emergency Regulations Public Comment

Dear Ms. Bisnett

The local water purveyors and general government agencies in the Martis Valley Groundwater Basin (MVGB) are committed to stewardship of the Martis Valley aquifer in a way that manages the basin within sustainable yield, complies with the Truckee River Operating Agreement (TROA), and complies with the Sustainable Groundwater Management Act of 2014 (SGMA).

The MVGWB is a healthy groundwater basin operating within its sustainable yield. This is supported by decades of scientific studies, including the recent US Bureau of Reclamation's Truckee River Basin study that included a state-of-the-art groundwater model for the MVGWB, a Lawrence Livermore National Laboratory Radio Isotope Aging study, and projections on the impacts of climate change to the region's water supply through the end of the century. We have worked carefully and collaboratively at the regional level to make sure that our general plan buildout projections can be served without overtaxing the Martis Valley Aquifer.

DWR Staff recently defined the requirements of an Alternate Plan under SGMA to be essentially the same as a Groundwater Sustainability Plan (GSP). Further, the GSP requirements so far appear to be written for worst case basin conditions and not commensurate with the needs of currently stable conditions that exist in many basins statewide. The current requirements for a GSP are very complex and expensive and should only be applied to groundwater basins that are not operating sustainably.

The Town of Truckee respectfully requests a revision to the GSP guidelines such that well managed, sustainable groundwater basins are not required to meet the requirements of a GSP designed to address the issues associated with distressed groundwater basins. This approach would address the inequity of using the same GSP requirements for all groundwater basins and would avoid the wasteful and non-productive expenditure of scarce public resources.

Tahoe/Truckee



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The MVGWB already has a complex and comprehensive regulatory framework that includes the federally enacted TROA, the Martis Valley Groundwater Management Plan (GMP), DWR's CASGEM, and local control. This framework, combined with minor enhancements of existing groundwater management, create an ideal candidate for an Alternative Plan, except that this option is not feasible based upon the language in the current guidelines and suggested application by DWR.

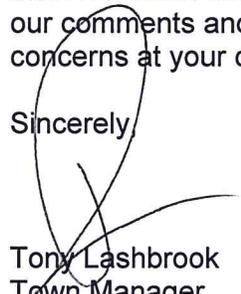
The MVGWB is not unique in its relative sustainability. There are other basins statewide that have been managed well. Typically, the managers in these basins met the expectations of AB 3030 and invested resources into prudent long-term planning for sustainability. The estimated cost to prepare a GSP - under the current draft guidelines - is approximately \$1 million, even with the existence of scientific work accomplished under AB 3030. It seems misguided to require the managers of sustainable basins to allocate the necessary resources to prepare a GSP at the same rigor as that of non-sustainable basins.

The Martis Valley basin is an ideal candidate for an Alternate Plan; however, the extensive plan requirements combined with the January 1, 2017 due date essentially eliminate this as a possibility. These logistical limits to the preparation of an alternative plan do not appear to be consistent with the intent of SGMA regarding Alternate Plans nor GSPs when applied to the many sustainable basins that exist in California.

The Town of Truckee has worked extensively with the local agencies in the MVGWB eligible to form a Groundwater Sustainability Agency - **Truckee Donner PUD, Placer County Water Agency, Northstar Community Services District, Placer County, Nevada County, and the Truckee Donner Public Utility District**- and, while we are committed to comply with SGMA, we are determined to protect our taxpayers and ratepayers from wasteful expenditures that would have little or no impact on the future condition of the Martis Valley Aquifer.

I sincerely appreciate the opportunity to comment on these guidelines as well as the time that DWR staff has spent with us to help us understand what they mean. Please consider our comments and know that we are available to work with DWR Staff to address our concerns at your convenience.

Sincerely,



Tony Lashbrook
Town Manager

Cc: Trevor Joseph (DWR)
Tony Firenzi (Placer County Water Agency)
Mike Staudenmayer (Northstar Community Services District)
Brett Story (Placer County)
Amy Irani (Nevada County)
Michael Holley, Truckee