



SAN LUIS OBISPO COUNTY  
**DEPARTMENT OF PUBLIC WORKS**

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October 5, 2015

Attn: Mr. Zaffar Eusuff, Program Manager  
California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236

Subject: Comments on the Proposition 1 Draft Sustainable Groundwater Planning Grant Program, Counties with Stressed Basin Proposal Solicitation Package.

Dear Mr. Eusuff,

On behalf of the San Luis Obispo County Public Works Department, we appreciate Department of Water Resources (DWR) efforts to expedite the subject guidelines and grant program. This letter serves to transmit comments on the "Draft Sustainable Groundwater Planning Grant Program Guidelines, Counties with Stressed Basins Proposal Solicitation Package (PSP) – Draft August 2015" (Draft PSP). Please consider the following suggested comments before finalizing the Draft PSP.

1. The grant application evaluation criteria in Table 5 includes points based on basin conditions consistent with SGMA's "undesirable results". However, the criteria includes only five out of six undesirable results criteria listed in Water Code 10721 (w). Consider including the sixth undesirable result by adding the proposed criteria question to the grant application in Table 5 - Application Evaluation Criteria.

"Is the project area experiencing chronic lowering of groundwater levels indicating significant and unreasonable depletion of supply?"

In addition, we request that land subsidence in the Table 5 - Application Evaluation Criteria be given equal weight to the other basin condition criteria. If the intent is to give extra weight to the condition where loss of storage is also resulting in a loss of storage space, the additional weight is covered when an applicant is able to meet both criteria (i.e. giving subsidence two points is double counting). Also, because SGMA now empowers counties to collect revenue to manage groundwater, they need time to collect the revenue to conduct the investigations necessary to verify land subsidence for stressed basin areas.

2. The current PSPs include eligibility criteria that groundwater basins in the proposal must not be adjudicated. The Santa Maria Valley Basin, a high priority basin, is listed as an adjudicated basin in Water Code 10720.8. However, there are portions of the Santa Maria Valley Basin that are not adjudicated, i.e. "fringe areas". The groundwater management in "fringe areas" needs to be established by the basin users to ensure the whole basin is sustainably managed. We encourage DWR to allow adjudicated basins to be included in the proposal as long as the intentions will improve sustainable groundwater management in the whole basin.
3. We support DWR's intent to clarify the Groundwater Management Compliance requirement to only apply to implementation efforts, not planning efforts. This allows groundwater basins which do not have the resources for the groundwater management plan in the past to seek supplemental funding.
4. DWR offers several examples of eligible project types. While we understand that this was not comprehensive, we encourage DWR to consider project types such as: installation of monitoring wells to improve data management and assessment of basin conditions; assessment of various funding mechanisms for basin planning and management activities; and assessment of effective recharge areas within a basin. Information from these project types target the needs for effective groundwater management that are most challenging to address (adequate data and funding) and would thereby help facilitate basin-wide sustainable groundwater management.

We welcome the opportunity to work with your staff to further develop these alternative approaches. Thank you for considering this comment letter when finalizing the Draft PSP. Should you have follow up questions or want further input, please contact Catherine Martin, County Public Works Staff Engineer, at (805) 781- 5275.

Sincerely,



COURTNEY HOWARD, P.E.  
Water Resources Division Manager

cc. Tracie Billington, Department of Water Resources, Chief of Financial Assistance Branch  
Keith Wallace, Department of Water Resources, Project Manager

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