

Comments DWR Groundwater Sustainability Plan Emergency Regulations due 4.1.2016

You are not recognizing that a PROPERTY OWNER may have groundwater rights and not an AGENCY. Any management of a groundwater basin would require the cooperation of ALL property owners. Costs are not addressed nor are sources of funding, in the long-term.

Not all groundwater is usable, such as geological formations including oil, may prohibit use. Contamination is another factor. Landslides, including historic landslides not always identifiable, are other key issues for consideration. Faults may not be mapped, yet contribute to instability.

Basins may be affected by urbanization. Coastal areas are affected by geology and demand for mansionization. "Sustainability" is a questionable term.

There is an assumption that groundwater storage may be available when that may not be the case. Pipelines, fiber optics, water lines and other issues are at hand. Public streets may be targeted, yet the ownership of that water would be questionable without the PROPERTY OWNERS' consent.

LA Regional Water Quality Control Board NPDES MS4 Municipal Separate Storm Sewer permit requires the Enhanced Watershed Management Plans to capture stormwater, regardless of groundwater rights. That Board has no legal authority over groundwater, only surface waters.

Water suppliers are not addressed, yet, in the City of Los Angeles, water is viewed as a Department of Water and Power issue.

In Los Angeles, we have adjudicated groundwater basins and other basins whose rights are held by individual property owners or the mineral rights may be titled to another party. This is an extremely complex situation where these regulations have no real meaning.

Costs would be borne by what parties? Legal costs are not addressed.

**Personal Information Redacted**