

**SEASIDE GROUNDWATER BASIN WATERMASTER
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December 20, 2016

Via Electronic Mail and U.S. Mail

Mark Nordberg, GSA Project Manager
Sustainable Groundwater Management Program
California Department of Water Resources
901 P Street, Room 213-B
P.O. Box 942836
Sacramento, CA 94236

Re: Marina Coast Water District (MCWD) Notification to the Department of Water Resources (DWR) to become a Groundwater Sustainability Agency (GSA) under the Sustainable Groundwater Management Act (SGMA)

Dear Mr. Nordberg:

This letter serves to document the concerns of the Seaside Groundwater Basin Watermaster (Watermaster) regarding MCWD becoming the GSA for the Monterey sub-basin of the Salinas Valley Groundwater Basin. The Seaside Groundwater Basin is one of the Adjudicated Basins listed in the SGMA, and the Watermaster manages the adjudicated Seaside Basin. Areas adjacent to the Seaside Basin are not adjudicated and require formation of a GSA under SGMA. Extractions by producers immediately adjacent to the Basin's eastern boundary have been identified by Watermaster as contributing to declining water levels in the eastern portion of the Seaside Basin. For this reason, and for other issues of concern that may arise along the Seaside Basin's boundaries over time, the Watermaster has a keen interest in the formation of adjacent GSAs.

The MCWD as a GSA intends to include in its jurisdiction portions of the Monterey sub-basin that fall outside of its District boundaries. The Watermaster is aware that MCWD is currently under contract with the Fort Ord Reuse Authority to service areas beyond its district boundaries, however once that contract expires, and if MCWD is allowed to establish a GSA over lands not in its service area, consumers in the those outlying areas would be effectively "annexed" into the MCWD without benefit of due processes such as Local Agency Formation Commission, Sphere of Influence, CEQA, and EIR. Furthermore, as fees are not allowed to be collected from consumers outside of a district's service area, MCWD would be unable to charge for the cost to maintain an effective GSA.

The Watermaster requests that DWR consider that the developing multi-local-agency, collaborative Salinas Valley Basin Joint Powers Authority may be better suited jurisdictionally as GSA for the Monterey sub-basin.

If you would like to discuss this matter further, please do not hesitate to contact the Seaside Groundwater Basin Watermaster at the above address.

Regards,



Ralph Rubio
Chairman, Seaside Groundwater Basin Watermaster

cc: Seaside Groundwater Basin Watermaster Board of Directors
Monterey County Board of Supervisors