



March 13, 2020

The Honorable Eduardo Garcia, Chair
Assembly Water, Parks and Wildlife Committee
1020 N Street, Suite 160
Sacramento, CA 95814

Re: AB 2502 (Quirk) Groundwater Sustainability Plans: Impacts on Managed Wetlands – **SUPPORT**

Dear Assembly Member Garcia:

The undersigned organizations are pleased to support AB 2502 (Quirk), legislation that would add impacts on managed wetland acreage or habitat to the additional analyses or components that Groundwater Sustainability Plans (GSPs) developed pursuant to the Sustainable Groundwater Management Act (SGMA) are required to contain.

SGMA was enacted in 2014 to regulate California's use of groundwater and avoid over-drafting of groundwater aquifers, with the first GSPs submitted to the Department of Water Resources on January 31, 2020. The undersigned organizations are very concerned that, without appropriate consideration in GSPs, managed wetlands – which provide vital habitat to Pacific Flyway waterfowl and other wetland dependent species – are in danger of being deprived of their only affordable water source.

California has lost 95% of its historic naturally occurring wetland acreage. In an effort to protect those few habitats which remained, in 1993 Governor Pete Wilson signed Executive Order W-59-93, the state's "No Net Loss" policy for wetlands, establishing a State Wetland Conservation Policy and providing comprehensive direction for the coordination of state-wide activities for the preservation and protection of wetland habitats. This policy conforms to the federal "no net loss of wetlands" policy that was adopted in 1988.

There is currently no requirement in SGMA that the GSPs analyze the impacts of pumping restrictions on wetlands and waterfowl habitats. As a result, GSPs in the most critically over-drafted basins of the San Joaquin Valley create a risk of phasing out the water sources for duck clubs and wildlife areas and refuges, which will ultimately decrease the amount of wetlands habitat for waterfowl and other migratory birds of the Pacific Flyway.

AB 2502 is intended to require that actions taken under the GSPs conform to the state's "no net loss" policy. The bill gives the authority to the Groundwater Sustainability Agencies (GSAs) preparing the

GSPs to determine how they will address wetland's water needs but requires them to conform to the state policy.

Because of the reasons listed above, the undersigned wildlife conservation organizations urge your "Aye" vote on this bill. If you would like further information about AB 2502, please contact Jeffrey Volberg at (916) 217-5117 or jvolberg@calwaterfowl.org or Bill Gaines at (916) 337-9031 or bill@gainesandassociates.net.

Sincerely,

Jeffrey A Volberg, Director of Water Law & Policy
California Waterfowl Association

Steve Miller, President
Tulare Basin Wetlands Association

Steve Chappell, Executive Director
Suisun Resource Conservation District

Don Kirby, President
Cal-Ore Wetlands & Waterfowl Council

Fred Harpster, President
Black Brant Group

cc: Members of the Assembly Water, Parks & Wildlife Committee
The Honorable Assembly Member Bill Quirk