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January 5, 2012

Mr. Timothy O'Brien
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

SUBJECT: Comments on Administrative Draft Aquifer Storage and Recovery General Order

Dear Mr. O'Brien:

The purpose of this letter is to provide comments from the Groundwater Resources Association of California (GRA) regarding the Draft Aquifer Storage and Recovery General Order (ASR Order), dated December 7, 2011. GRA echoes the findings in the preamble of the Draft ASR Order, in particular, that "reliance on groundwater through conjunctive management will become increasingly important in meeting the state's future water needs." The Draft ASR Order provides a workable solution that fulfills the state's mandate to protect groundwater quality as well as presenting clear and practicable requirements for permitting Low Threat ASR projects. As GRA makes every effort to inform its members of opportunities to comment on proposed water policy, regulation, and legislation, we anticipate that the State Board and Regional Board will be receiving specific comments on this document from individual agencies and entities.

GRA commends the Central Valley Regional Board staff, including Executive Officer Pamela Creedon, and staff of the State Water Resources Control Board for developing a balanced and thoughtfully-written Draft ASR Order.

Sincerely,

Sarah L. Raker, PG, CHG
President, GRA