

March 28, 2016



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California Department of Water Resources
Attn: Lauren Bisnett, Draft GSP Emergency Regulations Public Comment
P.O. Box 942836
Sacramento, CA 94236

Re: Draft GSP Emergency Regulations Public Comment

To whom it may concern:

On behalf of the CA Economic Summit, I am writing to submit comments on the Department of Water Resources' Draft Proposed Emergency Regulations for Groundwater Sustainability Plans.

As a coalition of civic leaders committed to sustainable economic growth, the Summit has spent the last five years promoting efforts to integrate urban and rural development, improve connections between land use planning and natural resource management, and provide more communities with the tools they need to pay for it.

In its new regulations governing local groundwater resource management, the Department has an opportunity to advance several of these ideas. The February 18 draft regulations take two important steps toward improving local governance of groundwater basins—requiring Sustainable Groundwater Management Agencies to assess the water impacts of general plans and requiring Integrated Regional Watershed Management Plans to be considered, as well.

The Summit believes more can be done to encourage local governments to break down local government siloes to achieve the promise of the Sustainable Groundwater Management Act. In particular, the Summit suggests the following changes:

Under section 354.10. Notice and Communication.

Please add: A list of the cities, counties and local agency formation commissions with land use authority within the groundwater basin.

Per Government Code Section 63532(a)

Under section 354.14. The Hydrogeologic Conceptual Model

The current draft of the Proposed Emergency Regulations for GSPs requires: “Delineation of existing recharge areas that substantially contribute to the replenishment of the basin, potential recharge areas, and discharge areas, including active springs, seeps, and wetlands within or adjacent to the basin.”

Section 10727.2 of the Water Code further requires that “The map or maps shall be provided to the appropriate local planning agencies after adoption of the groundwater sustainability plan.”

We recommend that this legislative provision be added to the Notice and Communication Section of the draft Emergency Regulations, or elsewhere, as appropriate.

Please refer questions to the Summit’s Justin Ewers, 916-244-1595; justin@cafwd.org.

Thank you for your consideration.

Best,

A handwritten signature in blue ink that reads "Judy A. Corbett". The signature is written in a cursive style with a large initial "J".

Judy Corbett
Founder, Local Government Commission
Leader, CA Economic Summit Working Landscapes Action Team (Groundwater Subcommittee)