

Via e-mail to: sgmps@water.ca.gov

Subject: Draft GSP Emergency Regulations Public Comment

DATE GROUNDWATER
SUSTAINABILITY PLAN
REGULATION COMMENT
RECEIVED BY DWR
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Article 5. SubArticle1. Section 354.10 Notice and Communication item (a) Add ...to include addresses, e-mail addresses and phone numbers and identity of interested party as being a public member, representative of a group, stakeholder public agency representative or employee, business owner, developer, etc....

Opinion: At the one and only noticed public meeting held by Omochumnes Hartnell Water District, I could identify less than 10 public members/ domestic well owners and although there were perhaps 25-30 people at the meeting, they were farmers, public agency members and members and /or directors of other water boards. It is important that an effort be made in the public outreach regarding GSAs (and GSPs) and in this case the effort was certainly minimal. It was a token meeting in my opinion and held in Sloughhouse a location outside of the Elk Grove/ Wilton area, where most of the "public"members/ domestic well owners reside and at 5 PM when most people are commuting home from work.

Since there are no mandated domestic well owners , public members or environmental members on the board, I feel the regulations should be tightened to verify and quantify and assess the quality of the public outreach in order to ensure involvement by all and equity and a voice for all. Lack of substantial evidence of public outreach, should be grounds for disqualifying a GSA until there is evidence of substantial effort to involve the public interests.

Article 5 Sub Article 1 Section 354.6 Administrative Information add (f) Require Statements of Conflict of Interest be provided by directors, managers, advisory committee members, volunteers and staff involving land ownership, as individuals or held by trust , partnerships, LLCs, land and development corporations of land within the basin setting or adjacent basin settings in which development and or urbanization is planned to occur, as evidenced by a General Plan or proposed to occur, as evidenced by an SOIA.

Opinion: The reason Elk Grove became a city in 2000 was to gain "local control" by the "founding fathers"- the farmers- so that development and urbanization in the agricultural lands could occur, as the County of Sacramento had for years denied applications for development beyond the Urban Services Boundary to the South of Elk Grove In 2007 Elk Grove filed an Sphere of Influence application with LAFCo to expand the city limits beyond the USB into approximately 8,000 acres of farmland. Many of the stakeholders working with the city to urbanize and develop their land were and are currently directors and managers of water districts and surrounding Resource Conservation Districts who have recently filed boundary modifications and filed to become GSAs- namely Omochumnes Hartnell Water District and Sloughhouse RCD. Although the application was withdrawn by the city, Elk Grove has recently refiled an SOIA for a smaller portion in the same area previously voted against by LAFCo and individual stakeholders have filed SOI applications for individual parcels in the same area previously voted against by LAFCO

Furthermore, even if these same stakeholder/directors were to recuse themselves on certain issues or to resign their seats on the board their influence would still be a factor.

This conflict of interest is most concerning as there is no mandatory balance of water interests required by the laws or proposed regs on the Board of Directors for the GSAs.

The same good old boys in cowboy hats that pitched local control and cityhood for Elk Grove are now pitching local control of the water "to keep the county and state from taking over".

I don't have a problem with the county or the state, I have a fear of "local control" having all the power over all the water, especially when it may be very hard for the public and other interests to get a seat at the table and when oversight appears to be at arm's length.

I'm sure that this scenario is replayed throughout the State. The stakeholder is the landowner whose land and water rights and seat at the table were passed down through generations and who now desires to develop his

land, and who is now a director on the GSA with new development oversight and approval based on groundwater sustainability.

Article 5. Sub Article 1 Description of Plan Area (g)(3) add ...and a copy of any sphere of influence application filed with LAFCo in addition to any related NOPs or EIRs.

I am a domestic well owner