



County Administrative Office

Gregory C. Devereaux
Chief Executive Officer

September 4, 2015

California Department of Water Resources
Attn: Sustainable Groundwater Management Section
P.O. Box 942836
Sacramento, CA 94236
By email to: SGMPS@water.ca.gov

RE: Comment Letter – Basin Boundary Revision Draft Emergency Regulations and Sustainable Groundwater Plan Regulations Scoping Topic 5 - Boundaries

Dear Sustainable Groundwater Management Section:

The County of San Bernardino (County) appreciates the opportunity to comment on the Basin Boundary Revision Draft Emergency Regulations and the Sustainable Groundwater Plan Regulations Scoping Topic 5 – Boundaries discussion paper.

The County agrees with Chino Basin Watermaster's statement on Page 3 of its September 4, 2015 comment letter (attached) that the Basin Boundary Revision Draft Emergency Regulations do not offer a mechanism for eliminating minimal fringe areas that abut adjudicated basins through a boundary revision. Assuming such fringe areas will remain following the completion of the basin boundary revision process, the County supports Chino Basin Watermaster's request that the Department of Water Resources (DWR) continue to work with watermasters and local agencies to develop an alternative mechanism for ensuring the sustainable management of minimal fringe areas.

On page 9 of the Sustainable Groundwater Plan Regulations Scoping Topic 5 – Boundaries discussion paper dated August 3, 2015, DWR asks whether sustainable management of these minimal fringe areas could be proven through:

- conformance to a lesser Groundwater Sustainability Plan standard, or
- a demonstration that de minimis extraction is occurring within the fringe area and therefore the whole basin is being sustainably managed by activities of the watermaster/parties to the adjudication.

The County submits that the answer is "Yes."

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The County looks forward to the opportunity to continue to work with DWR to develop a simple solution to the minimal fringe area issue.

Please note that the County Board of Supervisors has not adopted an official position on the Basin Boundary Revision Draft Emergency Regulations and Sustainable Groundwater Plan Regulations Scoping Topic 5 - Boundaries. However, to assist DWR with its efforts to implement the Sustainable Groundwater Management Act of 2014, the County Administrative Office has provided the above comments.

We are available to provide any further assistance so that DWR clearly understands the position taken by the County. Also, should you wish to discuss the County's comments, I can be reached at (909) 387-4384. Additionally, Josh Candelaria of the County Administrative Office's Legislative Affairs Unit may be reached at (909) 387-4821.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Page".

Bob Page
Principal Management Analyst, Special Projects
County Administrative Office
County of San Bernardino