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March 8, 2016

Mark W. Cowin, Director
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Draft Groundwater Sustainability Plan (GSP) Emergency Regulations

Dear Mr. Cowin:

On February 18, 2016, the Department of Water Resources (DWR) released the draft Groundwater Sustainability Plan (GSP) Emergency Regulations for public comment, scheduled to end on March 25, 2016. This aggressive schedule is proposed to meet the June 1, 2016 deadline provided in the Sustainable Groundwater Management Act (SGMA). While we recognize the statutory nature of this deadline, the Butte County Board of Supervisors respectfully request a 45-day extension of the comment period to May 9, 2016, in order to provide adequate time for stakeholders to fully evaluate the comprehensive regulation package and provide constructive comments.

In 2014, many people identified SGMA as the most important water legislation in a century, comparing it in importance to the establishment of the state's water rights system. The GSP regulations are one of the key elements that will lead to the success of SGMA and helping the state achieve groundwater sustainability.

Stakeholders from diverse interest groups have expressed appreciation of the comprehensive process employed by DWR in carrying out its SGMA implementation role. Significant outreach to the public and advisory groups, as well as iterative discussion and release of information has been the cornerstone of the success to date. This approach takes time, and it should not be abandoned simply to meet a legislative deadline that was codified without a full understanding of its potential implications. Not taking adequate time to receive input from the public before finalizing the regulations would seriously undermine implementation of the regulations.

The adoption of the GSP regulations represents the most important action that DWR will take to implement SGMA. Given the stakes involved, overriding consideration should be given to establishing the best regulatory product. An extension of comment period will bring DWR closer to that consideration and missing the statutory deadline by 45 days is more than justified. The benefit of taking additional time now to get it right will far outweigh any negative impact.

In conclusion, the Butte County Board of Supervisors strongly requests that the Department of Water Resources and the California Water Commission extend the comment period on the draft Groundwater Sustainability Plan Emergency regulations by 45 days. If you have any questions please contact Paul Gosselin, Director, Department of Water and Resource Conservation at 530-538-4343.

Sincerely,



Bill Connelly, Chair

Cc: David Gutierrez, DWR
California Water Commission
Senator Jim Nielsen
Assembly Member James Gallagher