July 20, 2016

Mr. Joseph Byrne, Chairperson
California Water Commission
Post Office Box 942836
Sacramento, CA 94236-0001

President
Marshall E. Ochylski

Vice President
Jon-Erik G. Storm

Directors
Charles L. Cesena
Louis G. Tornatzky
R. Michael Wright

Interim General Manager
Peter J. Kampa

District Accountant
Warmerdam CPA Group

Unit Chief
Scott M. Jalbert

Battalion Chief
Tom McEwen

Mailing Address:
P.O. Box 6064
Los Osos, CA 93412

Offices:
2122 9th Street, Suite 102
Los Osos, CA 93402

Phone: 805/528-9370
FAX: 805/528-9377

www.losososcsd.org

Subject: **Request for the California Water Commission to Reverse DWR's Draft Recommendation to Deny the Los Osos Groundwater Basin Boundary Modification Request**

Dear Chairperson Byrne:

I am writing this letter to strongly urge your Commission and the Department of Water Resources ("DWR") to approve the County of San Luis Obispo's ("County") request for a basin boundary modification of the Los Osos Groundwater Basin Boundary.

Unfortunately, the DWR has released a draft decision to deny that basin boundary modification request. In response, we are respectfully asking DWR to reverse that draft decision and support our well documented local efforts to achieve a sustainable groundwater basin.

It is our hope that DWR will support our local management and basin specific technical analysis as the best means of implementing Sustainable Groundwater Management Act ("SGMA") policy over more general state-wide consistency criteria which at least in our basin is based on outdated analyses.

Our groundwater basin is a recently adjudicated basin which has gone through a decades' long extensive process, including but not limited to the preparation of multiple technical analyses, community outreach, and navigation of the applicable legal/regulatory hurdles, to determine the best way to address the issues that threaten our basin, including seawater intrusion. As a result of that adjudicatory process, the water purveyors overlying the basin have formed a Basin Management Committee which is charged with implementing our judicially approved Basin Management Plan. As a result of that adjudication, our basin is exempt from SGMA and I believe DWR's approval of our request would be consistent with that explicit exemption.

The requested basin boundary modification has been unanimously approved by our Basin Management Committee and the various purveyors as the best means to implement the measures required under the approved Basin Management Plan, which is very similar to the Groundwater Sustainability Agency required under the specific terms of SGMA.

Our Basin Management Committee documents its efforts in annual reports required as part of the adjudication summarizing our monitoring data and showing the results of the Committee's implementation efforts. I understand a copy of our latest annual report has already been forwarded to DWR which shows the extent of information required in that annual report.

We urge DWR to approve the County's boundary modification request, which we believe is technically and functionally justified, in order to facilitate the local implementation of our Basin Management Plan which we believe is the best means of achieving a sustainable groundwater basin.

I thank you for your consideration.

Sincerely,

Marshall E. Ochylski
President, Los Osos Community Service District
Chairperson, Los Osos Groundwater Basin Management Committee