

To: Steve Johnson  
Cc: GA Directors (via Loren Duffy); David Janiec; Jim Markman  
From: Nick Panzer, Ridgecrest Resident  
Date: December 16, 2019  
Subject: Questions Concerning Public Review Draft of GSP (Plan);  
GA Meeting December 19, 2019, Agenda Item 10c.

## **BACKGROUND**

This Plan fails SGMA because it relies upon water imports that are merely “conceptual” and “potential” without a backup path to sustainability. Moreover, “anticipated” imports lack SGMA-required documentation such as:

- Criteria to determine the feasibility of imports.<sup>1</sup>
- Proof of a reliable source.<sup>2</sup>
- Criteria to evaluate the expected benefits.<sup>3</sup>
- Realistic plan to meet import costs.<sup>4</sup>
- Description of how recharge areas identified in the Plan substantially contribute to replenishment of the basin.<sup>5</sup>

Without such documentation, and without an alternative path to sustainability that does not rely upon water imports, DWR will likely and rightly “disapprove”<sup>6</sup> this Plan for failure to “describe a reasonable path to achieve sustainability.”<sup>7</sup> With this background in mind, I respectfully request answers to these questions.

## **QUESTIONS**

1. Specifically, what ...”circumstances...would trigger...termination of... [the import]..project”? Reg. 354.44.(b)(1)(A) requires a plan to answer this question at the outset.
2. Specifically, what “reasonable path to achieve sustainability” will the Plan take if we terminate the import project? Reg. 354.30.(e) requires a plan to answer this question at the outset.

---

<sup>1</sup> Reg. 355.4(b)(1) and (5)

<sup>2</sup> Reg. 354.44(b)(6)

<sup>3</sup> Reg.354.44(b)(5)

<sup>4</sup> Reg.354.44(b)(8)

<sup>5</sup> CA 10727.2(d)(4)

<sup>6</sup> Reg. 355.2(e)(3)

<sup>7</sup> Reg. 354.30.(e)