

To David Janiec, PAC Chair
From Nick Panzer
Subject: Comments on DRAFT GSP Chapter 1
8 January 2019

General Comment:

Shouldn't the Introductory Chapter be the last Chapter written and reviewed? How can one meaningfully review a Plan Introduction without knowing what's in the Plan? That said:

1.1, Purpose of GSP, Page 1-1

Page 1-1 refers to *water rights* four times. If this means to telegraph a GA plan for a "proportional" versus a "community value-driven" approach to the allocation of pumping reductions, then this crucial distinction should be explained here so stakeholders can timely understand and proactively engage the all-important allocation problem. For example, while proportional reductions may more closely align with case law than community value-driven reductions, strict application of proportional reductions to our basin would likely produce a result that most citizens (think IWWWD customers) would consider unreasonable due to the fact that most citizens would be left with insufficient affordable water for their basic health and safety. This result would obtain because most of the District's water is used for health and safety; thus, an 80-90% proportional reduction of the District's water allocation would necessarily force an impractical, inequitable, and wealth-destroying population decline in order to cover the health and safety of those who remain.

1.2, Sustainability Goal, Page 1-2

I believe that the first paragraph should expand to include "mitigation of overdraft." See GSP Reg. 354.44.(b)(2). See next paragraph.

Regards the second paragraph on Page 1-2, I interpret "planning and implementation horizon" to be continuously fifty years forward starting with Joint Power Agreement adoption, not GSP adoption. See CA 10721(r). This distinction may be relevant to the prior paragraph concerning mitigation of overdraft.

1.3.1, Organization and Management Structure, Page 1-6

The penultimate line of the first complete paragraph on this page should read "policy and technical aspects,' not "political and technical aspects."

1.4, Notice and Communication, Page 1-10

Above all, each stakeholder wants to know his/her direct or indirect groundwater allocation and the approximate unit price for actual use, all in relation to current actual use and prices. Thus, Section 1.4 should expand to tell each reader how to use the GSP to estimate that impact upon himself/herself, whether at home or at work. This will help fulfill the C & E Plan promise that each stakeholder will have an opportunity to understand how pumping reductions will affect any specific stakeholder.

Paragraph 1.4 should also expand to direct the public to the place in the GSP where the public can ascertain how the GA has considered “state policy regarding the human right to water” as required under GSP Reg. 350.4(g). This is crucial given that affordable water for health and safety will require an extraordinarily high percentage of safe yield. See comment at **1.1** above.

This section 1.4 should further expand to explain how any person can be added to the “interested party” list under CA 10723.4 in order to receive notices and documents such as this DRAFT GSP Chapter 1. Moreover, this section should expand to specifically reference GSP Reg. 353.8, which reads in pertinent part:

“Any person may provide comments [to DWR] onelements of a proposed Plan under consideration by the [GSA]. Comments shall be submitted to [DWR] by written notice, with a duplicate copy of the comment provided to the [GSA].”

Appropriate mailing addresses for DWR and GSA should also be added here to facilitate public use of this Reg. 353.8.