

From Nick Panzer to PAC Members; 1/3/19 PAC Meeting  
Subject: Agenda Items 5 and 8



Agenda Item 5. (Chapter Review Comments)

How will Draft GSP Chapters and PAC Member comments thereon be handled to satisfy Brown Act public transparency requirements?

Agenda Item 8 (Future Agenda Items)

At the 12/6/18 PAC Meeting, I requested an agenda item for legal counsel to address a PAC Member's rights to speak or write about GSP issues *in his own name* (i.e., without reference to PAC affiliation) to **any person** such as the GA, newspaper editors, public ads, and the Department of Water Resources (DWR). Note that DWR provides specific guidance for accepting comments in California GSP Regulation 353.8, which reads in pertinent part:

- (a) Any person may provide comments to [DWR] regarding a proposed or adopted Plan.
- (b) ...
- (c) .....[DWR] shall accept comments on [a GSA's] decision to develop a Plan....., including comments on elements of a proposed Plan under consideration by the [GSA].
- (d) Comments shall be submitted to [DWR] by written notice, with a duplicate copy of the comment provided to the [GSA].
- (e) Comments received by the [DWR] shall be posted on [DWR's] website.

On December 28, 2019, I spoke with Ms. Loren Bisnett at DWR to ascertain how to address comment submissions under Reg. 353.8. After researching the matter, she advised as follows:

Attention: Joyia Emard  
California Department of Water Resources  
PO Box 942836  
Sacramento, CA 94236-0001

She also suggested that a Comment Letter Subject Line reference GSP Regulation 353.8 and DWR Bulletin 118, Basin 6-54