



May 14, 2021

The Honorable Lorena Gonzalez
Chair, Assembly Appropriations Committee
State Capitol, Room 2114
Sacramento, CA 95814

**RE: Assembly Bill 754 (Mathis) – SUPPORT
As Amended April 15, 2021**

Dear Assembly Member Gonzalez:

On behalf of the Rural County Representatives of California (RCRC), I am writing to express our support for Assembly Bill 754, authored by Assembly Member Devon Mathis, which would authorize the Department of Water Resources (DWR) to extend the deadline for submission of a groundwater sustainability plan (GSP) for a high- or medium-priority basin by up-to-180 days after January 31, 2022 upon the request of a local agency or groundwater sustainability agency. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

Since their enactment over five years ago, the laws and regulations that are collectively referred to as the “Sustainable Groundwater Management Act” (SGMA) have directed local agencies to undertake significant research, analysis, planning, and political brokering over the management of local groundwater resources. Despite the size, scope, and considerable political significance of the task, local governments — including RCRC member counties — have taken up the challenge in earnest, drafting GSPs that are informed by public outreach, after holding several public meetings to ensure that stakeholders are not left out or left behind.

Unfortunately, due to the coronavirus (COVID-19) pandemic restrictions, local governments have been greatly hindered from conducting the kind of public process that they intended in order to meet the comprehensive requirements for submitting plans for high- and medium-priority basins, due by law to DWR by January 31, 2022. As several RCRC member counties have already communicated to DWR and the Newsom Administration, the ordinary challenges of conducting public outreach in rural California were compounded several folds due to the pandemic — especially due to rural

1215 K Street, Suite 1650, Sacramento, CA 95814 | www.rcrcnet.org | 916.447.4806 | Fax: 916.448.3154

The Honorable Lorena Gonzalez
Assembly Bill 754
May 14, 2021
Page 2

California's lack of broadband infrastructure, leaving those stakeholders without internet connection out of crucial planning and public input processes.

The spirit of SGMA necessitates robust stakeholder engagement so that GSPs not only have the best chance of meeting muster when reviewed by DWR, but so that these critical documents governing future groundwater allocation decisions have the greatest opportunity for local buy-in and community partnership. Without the ability to complete plans sufficiently, local governments and groundwater sustainability agencies not only fear possible sanction from the state, they fear even more the loss of credibility with local stakeholders, greatly hampering the roll-out and longer-term effectiveness of sustainability plans.

Fortunately, AB 754 provides a reasonable and practical solution to this problem. The bill would authorize DWR, at its discretion, to extend the submission deadline by up-to-180 days from the current statutory deadline date of January 31, 2022, upon request of a local government or GSA. Under the bill, DWR would not be required to extend the deadline, and because the provisions of the bill would only take effect at the start of January 2022, only those local governments and agencies truly in need of an extension at that very late stage of the process would likely request an extension. If improving conditions and lessened pandemic restrictions allow for local governments and agencies to resume public process in time for deadline submittal, RCRC expects very few, if any, requests to DWR for extending the deadline. AB 754 simply creates a safety valve should a county or sustainability agency find itself in an unavoidable position.

RCRC supports AB 754 as it allows DWR the flexibility to accommodate local governments and agencies greatly impaired by the COVID-19 emergency to submit a GSP within a reasonable period after the current statutory deadline. We believe this bill represents the type of common-sense solution that our local governments and agencies should be provided in the face of unprecedented challenges.

For the above reasons, RCRC respectfully requests your 'Aye' vote when this measure is heard before your Committee. If you should have any questions, please do not hesitate to contact me at snag@rcrcnet.org or (916) 447-4806.

Sincerely,

A handwritten signature in brown ink that reads "Sidd NAG". The signature is written in a cursive, slightly slanted style.

SIDD NAG
Legislative Advocate

The Honorable Lorena Gonzalez
Assembly Bill 754
May 14, 2021
Page 3

cc: The Honorable Devon Mathis, Member of the State Assembly
Members of the Assembly Appropriations Committee
Consultant, Assembly Appropriations Committee
Joe Shinstock, Consultant, Assembly Republican Caucus



April 19, 2021

The Honorable Devon Mathis
Member, California State Assembly
State Capitol, Room 2111
Sacramento, CA 95814

**RE: Assembly Bill 754 – SUPPORT
As Amended April 15, 2021**

Dear Assembly Member Mathis:

On behalf of the Rural County Representatives of California (RCRC), I am writing to express our support for your Assembly Bill 754, which would authorize the Department of Water Resources (DWR) to extend the deadline for submission of a groundwater sustainability plan (GSP) for a high- or medium-priority basin by up-to-180 days after January 31, 2022 upon the request of a local agency or groundwater sustainability agency. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

Since their enactment over five years ago, the laws and regulations that are collectively referred to as the “Sustainable Groundwater Management Act” (SGMA) have directed local agencies to undertake significant research, analysis, planning, and political brokering over the management of local groundwater resources. Despite the size, scope, and considerable political significance of the task, local governments — including RCRC member counties — have taken up the challenge in earnest, drafting GSPs that are informed by public outreach, after holding several public meetings to ensure that stakeholders are not left out or left behind.

Unfortunately, due to the coronavirus (COVID-19) pandemic restrictions, local governments have been greatly hindered from conducting the kind of public process that they intended in order to meet the comprehensive requirements for submitting plans for high- and medium-priority basins, due by law to DWR by January 31, 2022. As several RCRC member counties have already communicated to DWR and the Newsom Administration, the ordinary challenges of conducting public outreach in rural California were compounded several folds due to the pandemic — especially due to rural California’s lack of broadband infrastructure, leaving those stakeholders without internet connection out of crucial planning and public input processes.

1215 K Street, Suite 1650, Sacramento, CA 95814 | www.rcrcnet.org | 916.447.4806 | Fax: 916.448.3154

The Honorable Devon Mathis
Assembly Bill 754
April 19, 2021
Page 2

The spirit of SGMA necessitates robust stakeholder engagement so that GSPs not only have the best chance of meeting muster when reviewed by DWR, but so that these critical documents governing future groundwater allocation decisions have the greatest opportunity for local buy-in and community partnership. Without the ability to complete plans sufficiently, local governments and groundwater sustainability agencies not only fear possible sanction from the state, they fear even more the loss of credibility with local stakeholders, greatly hampering the roll-out and longer-term effectiveness of sustainability plans.

Fortunately, AB 754 provides a reasonable and practical solution to this problem. The bill would authorize DWR, at its discretion, to extend the submission deadline by up-to-180 days from the current statutory deadline date of January 31, 2022, upon request of a local government or GSA. Under the bill, DWR would not be required to extend the deadline, and because the provisions of the bill would only take effect at the start of January 2022, only those local governments and agencies truly in need of an extension at that very late stage of the process would likely request an extension. If improving conditions and lessened pandemic restrictions allow for local governments and agencies to resume public process in time for deadline submittal, RCRC expects very few, if any, requests to DWR for extending the deadline. AB 754 simply creates a safety valve should a county or sustainability agency find itself in an unavoidable position.

RCRC supports your AB 754 as it allows DWR the flexibility to accommodate local governments and agencies greatly impaired by the COVID-19 emergency to submit a GSP within a reasonable period after the current statutory deadline. We believe this bill represents the type of common-sense solution that our local governments and agencies should be provided in the face of unprecedented challenges. If you should have any questions, please do not hesitate to contact me at snag@rcrcnet.org or (916) 447-4806.

Sincerely,

A handwritten signature in brown ink that reads "Siddharth NAG". The signature is written in a cursive, slightly slanted style.

SIDD NAG
Legislative Advocate

cc: Members of the Assembly Water, Parks & Wildlife Committee
Consultant, Assembly Water, Parks & Wildlife Committee
Calvin Rusch, Consultant, Assembly Republican Caucus