



City of Corona
Department of Water and Power
"Protecting Public Health"

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VIA HAND DELIVERY

OCWD Basin 8-1 Boundary Modification
Orange County Water District
Attn: Adam S. Hutchinson
P.O. Box 8300
Fountain Valley, CA 92728-8300
ahutchinson@ocwd.com

Re: Proposed Basin Boundary Modification

Dear Mr. Hutchinson

We write in response to the Orange County Water District's (OCWD) initial notification regarding a proposed basin boundary amendment to Groundwater Basin No. 8-1 (the "Basin") (DWR Bulletin 118). Thank you for providing the opportunity to provide preliminary comments.

We would appreciate receiving any further geologic and other scientific information OCWD can provide supporting the proposed new boundaries, particularly those changes proposed in Riverside County. Please also send us hard and electronic copies of any information OCWD submits to DWR in furtherance of the proposal, as described in Paragraph 7 (page 4) of your January 26, 2016 letter to the City of Corona. We will be better able to evaluate the proposal and provide more substantive comments with the requested information in hand.

From our initial review, it appears that the OCWD proposal lacks sufficient justification about why the proposed new basin boundary line should be moved easterly, encroaching into the existing medium priority Upper Santa Ana Valley Temescal Subbasin (No. 8-02.09) ("Temescal Basin") The proposal does not explicitly address that any easterly expansion of Basin 8-1 would necessarily also change the westerly boundaries of the adjacent Temescal Basin which underlies the City of Corona water service area and other areas of Riverside County.

We note that the revisions of Basin 8-1 proposed by OCWD could be easily terminated at the existing boundary between Basin 8-1 and the Temescal Subbasin without any modification to the existing inter-basin boundary. Because the City and other interested parties will need time to more closely examine any redefinition of the westerly boundary of the Temescal Basin, our preliminary conclusion is that we object to any proposal to modify the eastern/northeastern