



# Mendocino County Farm Bureau

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Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

September 4, 2015

Via Email: sgmps@water.ca.gov

California Department of Water Resources  
Attn: Sustainable Groundwater Management Section  
P.O. Box 942836  
Sacramento, California 94236

RE: Draft SGMA Basin Boundary Emergency Regulations

The Mendocino County Farm Bureau (MCFB) is a non-governmental, non-profit, voluntary membership, advocacy group whose purpose is to protect and promote agricultural interests throughout the county and to find solutions to the problems facing agricultural businesses and the rural community. MCFB currently represents approximately 1200 members. MCFB would like to submit comments and recommendations on the draft SGMA Basin Boundary Emergency Regulations.

## **Comments and Recommendations**

### **§340.4 Basin Boundaries**

*Unless other basin boundaries are established pursuant to these regulations, a basin's boundaries shall be as identified in Bulletin 118. The unambiguous written description of a basin boundary in Bulletin 118 shall prevail over any inconsistent basin boundary as depicted on a map, in an electronic data file, or otherwise, except when modified pursuant to these regulations. Any discrepancy shall be resolved by the Department based upon the best available technical information.*

For the Ukiah Valley Groundwater Basin, the Bulletin 118 (2.27.04 update) describes the boundary of the basin based on geological formations with little geographic reference related to the outside boundary of the basin. The reference throughout the Bulletin 118 description of the basin, Cardwell (1965)<sup>1</sup>, has a map of the basin included in the 1965 study based on the geological formation types referenced. A more recent study, Larsen and Kelsey (2005)<sup>2</sup>, also references the Cardwell (1965) study of the Ukiah Valley Groundwater Basin, but there is a slight variation in the outside boundaries of the basin map provided. Both the Cardwell (1965) and Larsen and Kelsey (2005) basin maps have variations in the basin boundary lines when compared to the recent GIS mapping layer of the basin provided by DWR.

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<sup>1</sup> Cardwell, G.T., 1965, Geology and ground water in Russian River valley areas and in Round, Laytonville and Little Lake Valleys, Sonoma and Mendocino Counties, California, U.S. Geological Survey Water-Supply Paper.

<sup>2</sup> Larsen, Marty and Kelsey, Harvey. 2005. Geologic Maps of late Neogene and Quarternary Deposits in the Ukiah Basin. Humboldt State University.

From a planning perspective, it will be a challenge to determine the scope of developing a Groundwater Sustainability Plan without having a single, accurate reference map that clearly defines the basin boundaries. The "unambiguous" description of the Ukiah Valley groundwater basin within Bulletin 118 is actually fairly ambiguous. Since most of the properties that are in/out of the basin, depending on which basin map you reference, are rangeland or in agricultural production, MCFB requests that DWR work toward resolving the mapping discrepancies and provide a single, updated, accurate reference map (preferably in GIS) that clearly defines the Ukiah Valley groundwater basin boundaries. This map should be referenced in the basin description in Bulletin 118 so that there are not discrepancies on which map accompanies the written description of the basin.

Since the current timeline for adopting the draft basin boundary emergency regulations is October-November of 2015 with potential basin boundary modification requests accepted by DWR in January of 2016, MCFB also requests clarification as to whether a basin boundary adjustment/clarification described above for the Ukiah Valley basin would be considered an administrative adjustment and therefore would not constitute a modification subject to the timeline above (as mentioned in §section 342) or would this boundary clarification be required to be submitted in January 2016.

### **§341 Definitions**

#### **(d) Affected Basin**

It is recommended to edit the definition of affected basin to include language that clarifies that the affected basin is the basin or subbasin that is the subject of a basin boundary revision request.

### **§342.6 Other Boundary Modifications**

*Any boundary modification that does not conform to the categories specified in this article may be considered by the Department based on information the Department deems adequate to evaluate the modification in accordance with section 10722.2 of the Water Code.*

Will a request to clarify a groundwater basin external boundary, similar to the Ukiah Valley basin, fall under a "other boundary modification"?

If not, it appears that the only means of addressing a change to an external boundary of a basin is under a scientific modification as described in §342.2. The requirements for the technical studies to support a scientific modification are costly and therefore a full scientific modification should not be required simply to clarify what is the actual external boundary of a basin. It is recommended that there be clarification as to how local agencies can work with DWR to clearly define external basin boundaries without having to go through a full basin modification.

### **§343.10 (D)**

*The requesting agency shall, upon receiving notice that the request is complete, notify all interested local agencies and public water systems and any other person or entity who has expressed interest in receiving notification of the proposed modification to the requesting agency.*

It is recommended that this language should be clarified to only require notifications to local agencies, public water systems and individuals within or immediately bordering the affected basin.

### **§344.8 Local Support**

(a)(1) through (a)(3) refers to the need for support from affected agencies and affected systems. This language is broad and could lead to jurisdictional challenges if support is required from entities outside of or not adjoining the basin in question. It is recommended that the local support component should be related to agencies and systems within the affected basin or immediately bordering.

### **§344.10 General Information**

*(c) A GIS file of the proposed groundwater basin boundaries and the jurisdictional boundaries of any affected local agency.*

It is recommended that the GIS files should only be required for local agencies within or immediately bordering the affected basin in question.

MCFB appreciated the opportunity to submit comment on the draft SGMA Basin Boundary Emergency Regulations and encourages DWR to consider the comments and recommendations listed above.

Sincerely,

A handwritten signature in cursive script that reads "Frost Pauli".

Frost Pauli  
President