

Via e-mail to: sgmps@water.ca.gov

Subject: Comments on SGMA Basin Boundary Modifications

Comments in regard to SGMA Basin Boundary Modification Regulations

DATE BASIN BOUNDARY
REGULATION COMMENT
RECEIVED BY DWR

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General:

The current process requires detailed information to justify a basin boundary adjustment but does not leave the time necessary to compile such justification if it doesn't already exist. It is important to establish a process by which basin boundaries may be adjusted as the technical information emerges from the studies conducted to fulfill the requirements of the Groundwater Sustainability Plans (GSPs). In addition, the expected time between updates of Bulletin 118 is too great to limit adjustments to those updates. A process should be established by which modification requests can be made, approved, and accessed in between updates. This could be a dedicated website with current information.

In many cases, the basin boundaries currently shown in Bulletin 118 were apparently developed with little or no technical information other than a topographic map. Better information should be accepted and used when available, even if it is incomplete or imperfect.

It is appropriate to adjust basin boundaries on the basis of hydrogeological concerns as a higher priority than jurisdictional concerns. Jurisdictional adjustments may in some cases make basin management simpler, but will complicate other matters by ignoring natural flow barriers or creating arbitrary barriers where no natural ones exists.

The Guidelines seem to allow little constraint for rejection of Basin Boundary adjustments by DWR. They also appear to allow DWR to rescind previous approvals of adjustments with little constraint (Section 346.6). The guidelines should be modified to require more rigorous justification for rejecting requests or rescinding approval similar to those required for approval.

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