

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

Subject: Draft GSP Emergency Regulations Public Comment

DATE GROUNDWATER
SUSTAINABILITY PLAN
REGULATION COMMENT
RECEIVED BY DWR
03/30/2016

Regarding Section 354.14. Hydrogeologic Conceptual Model:

While data exists in some detail for a few, typically adjudicated, areas managed by well-funded Water Districts, most of the State has poor data sets and poor models. These are repeated and quoted in following technical studies of those areas. And by that action gain acceptance. But overall for all the numerous studies that exist the actual parameters and underground conditions of our Groundwater Basins have been poorly studied. Documentation of the actual lateral aspects of our groundwater basins are poorly understood. Well log data give us individual data points. Studies then extrapolate between these points with no data what so ever to justify their assumptions. Obviously that data is not available and would be extremely expensive to acquire. So we go ahead with what we have.

Good data exists from oil exploration efforts and may contain detailed data that could be extracted to describe the upper geologic layers that hold our groundwater without revealing the private data that describes potentially oil bearing strata below. As of this time the current studies will have to suffice to begin managing the basins. *The Regulations should have language to create regional studies to get good “real” data to guide us in the future. The Regulations **should not** overburden individual districts with performing these studies separately. The Regulations and the State need to clearly give us a unified and broad path to accomplish this essential goal. It needs to be done for all our sustainability efforts to be successful. To control the costs the Studies need to be done across the State. The costs to do these studies need to be shared across the whole State. The State could look to the GSAs to recoup those costs in a fair and proportional fashion.*

USGS is coming up with better maps at this time and we should make this data broadly available to all parties working on GSP's. Funding to create even better maps needs to be made available.

New tools are being developed to map our subsurface areas. They are currently very expensive. The State should evaluate and implement surveys of all the critically over drafted basins. They should start with those basins with the poorest data. I believe the Paso Robles Groundwater Basin is a very poorly studied basin. SLO County has paid for some studies based on a scattering of wells and a lot of interpolation. These initial studies were very good for the limited budget and time available. Unfortunately all the money we have spent since for engineering firms to write even larger studies based on the data of the initial study has not broadened our understanding. Nor has the money we spent on computer modeling of the same data sets. For the uninitiated Bureaucracy these efforts have created needed reports, and we have a nice stack of them. The Reports allowed us to move ahead with needed action, but they do not give us a good understanding of how our basin operates. The underground parameters remain poorly understood. We have little understanding of how water moves and where it moves. We do not have any reliable documentation of our aquifers. These same limited reports will be used to write our GSP. We need to do better and I know you would like us to do better.

Personal Information Redacted