



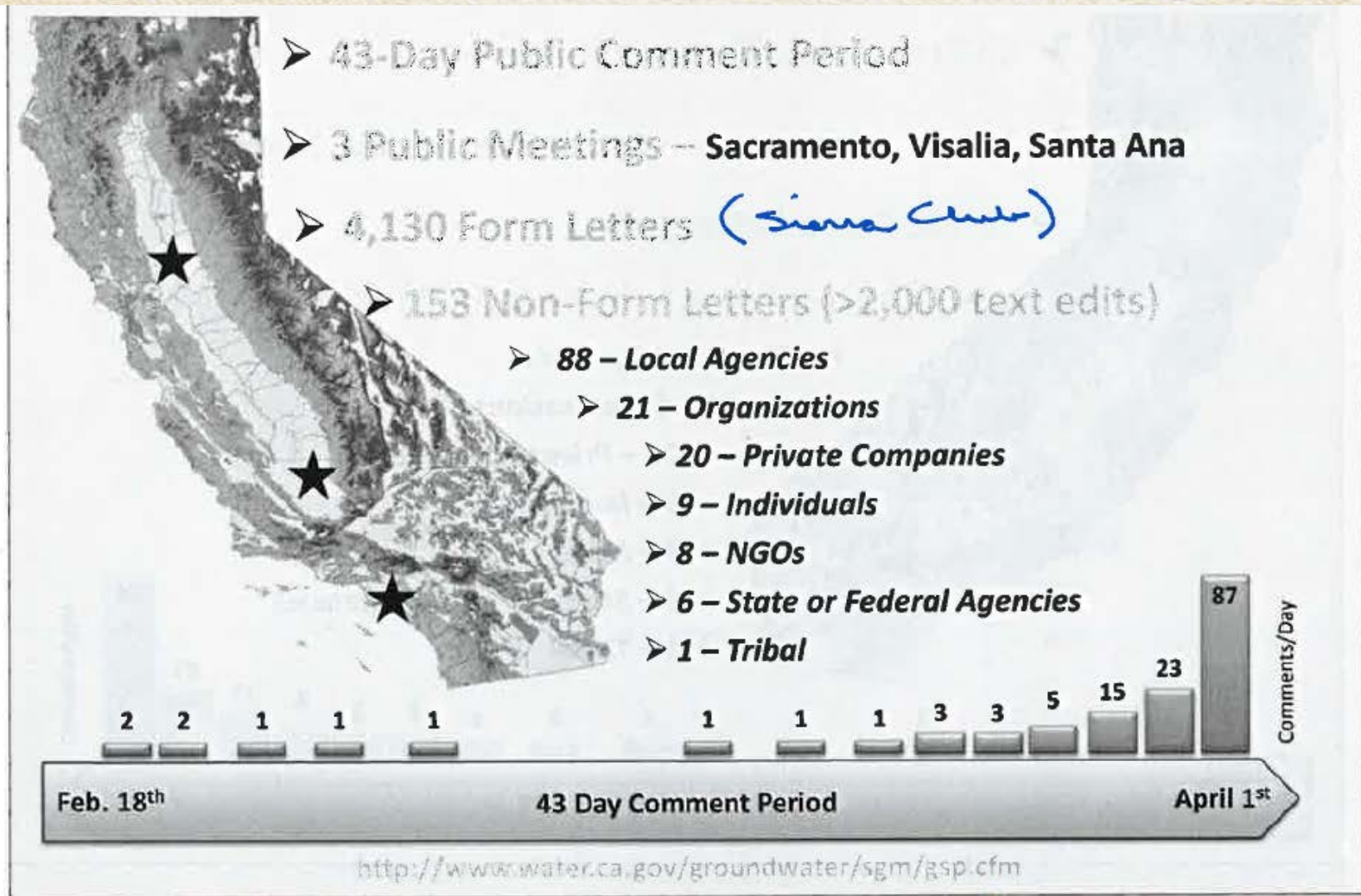
GSP Regulations

April 21, 2016 SCGA SGMA Subcommittee


Current Status

- ✓ Public Draft [February 18, 2016](#)
- ✓ Comment period extended to [April 1, 2016](#)
- ✓ SGMA Subcommittee Presentation [March 10, 2016](#)
- ✓ SCGA Comments [March 30, 2016](#)
- ✓ DWR Website Posted [April 14, 2016](#)
- ✓ California Water Commission (CWC) Hearing [April 20, 2016](#) – summary comments and revisions
- Final Public Draft Released Prior to Early May
- CWC Hearing End of May to Adopt Final Regulations by [May 18, 2016](#)
- [June 1st Submit adopted GSP Regulations to Office of Administrative Law](#)

Comments Received



General Principles

- Focus resources on addressing known data gaps and uncertainties
 - Better defining the roles of DWR and GSAs
-
- General principles should be expanded to include:
 - Requirement to address uncertainty & data gaps *recognize, allow for*
 - Overview of Substantial Compliance 
 - DWR and Local Agency responsibilities

Reporting Standards

- Clarifying BMPs
 - BMPs appear to be either:
 - Outside of SGMA intent/authority
 - Too onerous
 - Confusing as to who is responsible for developing (DWR or GSA?)
 - Certain technical standards too onerous
- POSSIBLE REVISIONS:
- Replace BMPs with monitoring protocols

10279
10279 b 9 -- BMP's
"assignment of DWR to develop BMP's"

Administrative Information

- Financial Information and Land Use Coordination

- Financial ability to implement plan including revenues and costs too onerous and speculative
- Evaluation of land use plans outside of Plan are too onerous and often not necessary *basin*
- Including maps of "all" wells in the basin too onerous, not practical, and not necessary

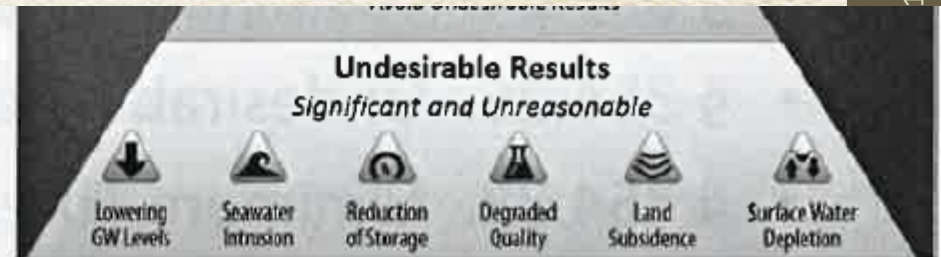
"best available information" standard

"identify wells in basin"

Basin Setting and Sustainable Management Criteria

- Broaden Management Area language -

- Add requirement that minimum threshold not infringe on other WQ regulations



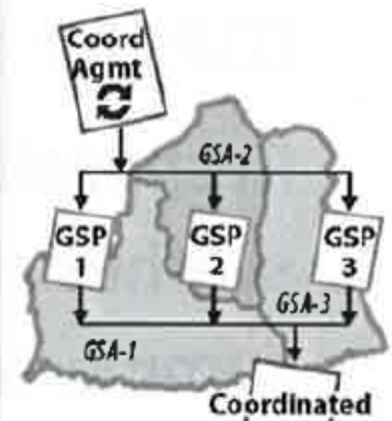
- Remove additional 5 year allowance for the minimum threshold for depletions of interconnected surface water *- apply best efforts*
 - Recognize/allow for a wide estimate range until uncertainty can be reduced

Coordination

- Intrabasin Coordination

- Intrabasin: Remove Coordinating Agency term and all responsibilities of this entity
 - Add requirement for a point of contact in the Coordination Agreement
- Intrabasin: Retain Coordination Agreement requirements but clarify and align to SGMA

Multiple GSAs, Multiple GSPs with required Coordination Agreement



Alternatives

NATURE OF COMMENTS:

- “Functional equivalency” term is unclear creating concerns that the January 1, 2017 due date cannot be met
Term from adoption of regs
- Alternatives should be evaluated on objectives of SGMA only, not GSP regulation criteria
- The 10-year period from 2005-2015 does not reflect average hydrologic conditions, is too restrictive, and should be determined by the Agency

Alternatives

POSSIBLE REVISIONS:

- Add clarity to the functional equivalent language to ensure understanding for those preparing an Alternative
- Maintain evaluation criteria on the objectives of SGMA and GSP regulations
- Allow flexibility for determination of the 10 year period in combination with current conditions

End of Presentation