

**Groundwater Sustainability Plan
Draft Regulations**

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

Subject: Draft GSP Emergency Regulations Public Comment

DATE GROUNDWATER
SUSTAINABILITY PLAN
REGULATION COMMENT
RECEIVED BY DWR
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Re: Comments on SGMA Groundwater Sustainability Plan Draft Emergency Regulations

Section 354.18, Water Budget, addresses components of the water budget that will be needed for assessment, planning and operations. However it does not specify a temporal and spatial resolution for this information. Each Plan should specify and justify the choice of spatial resolution for quantities such as evapotranspiration, recharge and subsurface flow, as well as the temporal resolution; and these should be linked to the decision making the water budget will inform, both internally and externally. Section 354.34 subsection (a) has some language about this.

The 10 years in Subsection (b2B) is too short for historical analysis, and should be linked more to climate time scales of 50-100 years, as is done for forward planning. For the forward planning that considers climate change, the Plan should also document and justify the choice of projections.

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