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April 12, 2023

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VIA E-MAIL – MEYERSD@SVBGSA.ORG; BOARD@SVBGSA.ORG

Salinas Valley Basin Groundwater Sustainability Agency
Board of Directors
168 W. Alisal Street, 3rd Floor
Salinas, CA 93901

RE: April 13, 2023 Board of Directors Meeting—Agenda Item No. 7.a, Receive Water Year (WY) 2022 Annual Reports, 7.c, Accept Tiered Fee Justification Memorandum, and 7.d, Receive Tiered Fee Preliminary Projects and Outreach Plan

Dear Chair Bramers and Honorable Members of the Board:

This office represents the Salinas Basin Water Alliance ("Alliance")[1] and submits this letter in response to Salinas Valley Groundwater Sustainability Agency ("GSA") April 13, 2023 Board Meeting Agenda Items No. 7.a, Receive Water Year (WY) 2022 Annual Reports ("GSP Annual Reports"), 7.c, Accept Tiered Fee Justification Memorandum ("Proposed Budget Tiers"), and 7.d, Receive Tiered Fee Preliminary Projects and Outreach Plan (collectively, "Proposed Budget Tiers"). The Alliance appreciates the complex and difficult work of the GSA in implementing the Sustainable Groundwater Management Act. However, the Alliance submits these comments to highlight its concerns with the process for preparing and submitting the GSP Annual Reports and the contents thereof, and the GSA's Proposed Budget Tiers. Each are addressed in turn.

Agenda Item No. 7.a—The Board Should Direct the GSA Staff to Withdraw, Correct and Re-Submit the GSP Annual Reports to the Department of Water Resources

The Alliance understands that the GSA has already submitted the GSP Annual Reports to the Department of Water Resources ("DWR"). These Reports, however, were never circulated for public review or considered by the subbasin committees or this Board prior to submittal. The Alliance objects to this lack of process—indeed, it is the practice of other groundwater sustainability agencies to circulate GSP annual reports for public comments and decisionmaker approval prior to submittal to DWR. Moreover, the submitted Annual Reports include significant errors that must be corrected.

If GSA staff had permitted public review of the GSP Annual Reports, the Alliance would have had the opportunity to detail the many flaws in the Reports. (See **Exhibit A, aquilogic, Inc. April 5, 2023 Technical Memorandum re 180/400-Foot Aquifer Subbasin Annual Report**.) Chief among these concerns is that the Annual Reports fail to mention that an exceedance of groundwater minimum thresholds during drought does not constitute an undesirable result if such conditions are "offset by increases in groundwater levels or storage during other

[1] The Alliance is a California nonprofit mutual benefit corporation formed to preserve the viability of agriculture and the agricultural community in the greater Salinas Valley. Alliance members include agricultural businesses and families that own and farm more than 80,000 acres within the Salinas Valley.

periods."[2] This is significant because the Annual Reports reflect water levels during drought conditions, while those groundwater levels have rebounded significantly as a result of this present wet season, as evidenced by the Second Quarter of Water Year 2022-2023 Salinas Valley Water Conditions Report prepared by the Monterey County Water Resources Agency.

The Annual Reports also mischaracterize Water Year 2022 as a "dry-normal year." The Alliance has expressed its concern to GSA staff regarding this characterization—Water Year 2022 was most certainly a drought year. In March 2022, Governor Newsom issued Executive Order N-7-22 to address issues and concerns caused by the severity of the drought last year.[3] And the U.S. Drought Monitor classified all of Monterey County as in severe or extreme drought at the end of Water Year 2022.[4] The GSA has previously relied upon USGS stream gage data to determine water year type. However, that data clearly mischaracterizes the Water Year Salinas Valley Basin just experienced, where all users in the Basin faced the very real effects of a historic drought.

To address these process and substantive issues, the Alliance requests the Board direct GSA staff to:

1. Withdraw the submitted Annual Reports by letter to DWR;

2. Publish the Annual Reports as drafts for public review and comment in advance of the Board's consideration of the Annual Reports;

3. Incorporate any comments received, including but not limited to the errors identified in aquilogic, Inc.'s April 5, 2023 Technical Memorandum; and

4. Establish a process for making the Annual Reports for all subbasins available to the public for review and comment and Board approval, prior to submission, every year.

Agenda Item No. 7.c & 7.d—The Board Should Reject the Proposal to Allocate Certain Budget Costs to Specific Subbasins

As required by the California Constitution, the GSA may only adopt its regulatory fee by determining, based upon a preponderance of the evidence, that the costs "allocated to a payor bear a fair or reasonable relationship to the payor's burdens on, or benefits received from, the governmental activity."[5] The preponderance of the evidence shows that the subbasins of the Salinas Valley Basin are interconnected with actions in one subbasin affecting—often materially—other subbasins. In other words, groundwater management in the Upper Valley impacts groundwater management in the Forebay, which impacts groundwater management in the 180/400-Foot Aquifer, Eastside, Langley, and Monterey.[6] (See **Exhibit B, aquilogic, Inc. November 9, 2022 Technical Memorandum re Subbasin Hydrological and Hydraulic Interconnectivity**.) Given that, the evidence dictates that any

[2] Wat. Code, §10721(x)(1).
[3] https://www.gov.ca.gov/wp-content/uploads/2022/03/March-2022-Drought-EO.pdf.
[4] https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA/.
[5] Cal. Const., art. 13C, § 1.
[6] Hydrogeology and Water Supply of Salinas Valley White Paper, 1995 Salinas Valley Groundwater Basin Hydrology Conference, pp. 15-16; 3 Upper Valley Subbasin GSP, § 4.3.1.1; Forebay Subbasin GSP, § 4.3.1.1; Eastside Subbasin GSP, § 4.3.1.1; Langley Subbasin GSP, § 4.3.1.1; Monterey Subbasin GSP, § 4.2.3; October 15, 2021 aquilogic, inc. memorandum Re Comments on Draft Groundwater Sustainability Plans for the Eastside Aquifer, Forebay Aquifer, Upper Valley Aquifer, Langley Area, and Monterey Subbasins of the Salinas Valley Groundwater Basin, pp. 2-3.

regulatory fee must be distributed equally across all subbasins. Alternatively, the GSA could implement fees on all groundwater production Basin-wide to support its regulatory efforts.

The GSA seemingly acknowledges that any fees must be distributed equally across all subbasins as it uses grant funding allocated to the 180/400 Subbasin GSP implementation to fund activities the GSA identifies as basin-wide fees. Similarly, the GSA has expressly acknowledged that the GSPs do not include an analysis of interconnectivity among the subbasins:

> The SVBGSA agrees that impacts on adjoining basins or subbasins must be addressed before implementing any management actions or projects. SVBGSA plans to conduct these analyses, which will include, among other things, updating the water budgets and sustainable management criteria in the 5-year updates if necessary, to account for inter-basin flows and impacts on adjoining basins or subbasins, when an appropriate tool becomes available.[7]

Despite this fact, the GSA has developed the Proposed Budget Tiers to allocate certain budget costs to only one or a few of the subbasins in the Salinas Valley. GSA staff and counsel committed the GSA, at GSA committee meetings in October and November 2022, to undertaking significant technical work before proposing any such tiering.[8] That technical work has not been done—the "Technical Memorandum re 2023/2024 Budget Tier Justification" prepared by Montgomery & Associates includes one sentence conclusions—without any analysis—that certain costs are specific to a particular subbasin.

Additional flaws in the Proposed Budget Tiers are as follows:

- Seawater Intrusion: The M&A Technical Memo states that the costs associated with the Seawater Intrusion Model should be assigned to the 180/400-Foot Aquifer Subbasin because "Seawater intrusion occurs in the Monterey and 180/400-Foot Aquifer Subbasins." The fact that seawater has intruded two of the subbasins within the GSA's jurisdiction, but not yet others, does not support the conclusion that water users in those subbasins are responsible, much less entirely responsible. The regulatory fee must bear a reasonable relationship to the burdens and benefits received from the activity and the GSPs expressly acknowledge that seawater intrusion in the 180/400-Foot Aquifer is exacerbated by pumping depressions in the Eastside, and Langley Aquifers.[9] Indeed, the GSA is presently undertaking modeling efforts to evaluate the extent of these inter-subbasin impacts.

- Demand Management Facilitation Services Costs: The Proposed Budget Tiers assign all costs associated with demand management facilitation costs to the 180/400-Foot Aquifer. Again, this is nonsensical. For one, as discussed above, the data shows that groundwater management in one subbasin will impact groundwater in another subbasin. But also, the facilitation services undertaken to date by California State University Sacramento College of Continuing Education Consensus and Collaboration Program have involved the entire Salinas Valley Basin, not just the 180/400-Foot Aquifer. The facilitator's draft report recommends that the GSA not pursue a formal demand management policy at this time, but instead

[7] See, e.g., Upper Valley Subbasin GSP, Response to Comment 38.
[8] See Zoom Recordings for Budget & Finance Committee Meetings on October 6, 2022 and November 4, 2022.
[9] See, e.g., Eastside Subbasin GSP, pp. 3-17, 5-11, 6-19-20 ("Groundwater pumping near the [C]ity of Salinas has created a cone of depression . . . that draws in groundwater into the Eastside Aquifer Subbasin from the 180/400-Foot Aquifer Subbasin, which is naturally slightly downgradient in the Salinas area. Estimated groundwater inflows from the 180/400-Foot Aquifer Subbasin have slightly increased since 1980."); Langley Subbasin GSP, pp. 3-18, 5-7, 5-18, Figure 5-11, 6-19, 6-21-23.

engage in further dialogue and outreach with stakeholders across the Salinas Valley Basin. Accordingly, this cost should continue to be borne by all subbasins or eliminated from the budget all together.

- Deep Aquifer Study Costs: The Proposed Budget tiers assign all of the costs associated with the Deep Aquifer Study to the 180/400-Foot Aquifer, Eastside, Langley, Corral de Tierra, and Forebay Subbasins based upon a definition of the "Deep Aquifers" proposed by the GSA's technical consultant. This is worrisome as the Board has not formally adopted the definition proposed by the technical consultant, but is now being asked to adopt a tiered fee based upon that definition. That process is flawed. Further, there are numerous concerns with the proposed definition of the "Deep Aquifers." For one, it is readily apparent that areas of the Salinas Valley Basin (e.g., the Upper Valley, Forebay, etc.) contain the same geologic formations as the "Deep Aquifers" but are excluded from the "Deep Aquifers" area. Similarly, areas outside of the "Deep Aquifers" can act as sources of recharge on the Deep Aquifers through the lateral movement of groundwater. These areas must be included in any tiered fee for the Deep Aquifers study in order for the fee to bear a fair or reasonable relationship to the payor's burdens on, or benefits received from, the study.

- CSIP Expansion Costs: The Proposed Budget Tiers assign all costs associated with the CSIP expansion to the 180/400-Foot Aquifer. However, it is unclear why this budget line item is necessary—the Monterey County Water Resources already funds the CSIP project by assessing landowners in its Zone 2B. The GSA is thus proposing to double-tax these property owners for the same project.

For these reasons, the GSA cannot lawfully impose certain budget costs to specific subbasins this year.

In addition to these numerous legal flaws, there are serious practical complications in requiring certain subbasins in the Salinas Valley to bear the burden of specific budget costs.

- The lateral geographic boundaries of the subbasins split numerous properties that produce groundwater from a common supply. Assessing subbasin specific fees (i.e., "tier 2 fees") to these properties—regardless of where the water is actually produced or used—could lead to absurd results. For example, the Proposed Budget Tiers propose charging a landowner that straddles the 180/400-Foot Aquifer Subbasin and the Monterey Subbasin a different per irrigated acre fee for the proportion of its property located in each subbasin. What if the landowner only produces water from the 180/400-Foot Aquifer Subbasin, but that water is applied to acreage located in both subbasins? Will the landowner only be charged the fee charged to the 180/400-Foot Aquifer Subbasin, or both, or some other scenario?

- More egregiously, there are instances in the southern valley of water being produced from the Salinas Valley Basin and used outside of the Basin boundaries. The entities using that water will not pay any portion of the regulatory fee because the property where the water is applied is not within the assessed area. How then can the GSA's regulatory fee bear a fair or reasonable relationship to the payor's burdens on, or benefits received from, the governmental activity?

As a further example of the legal and practical problems with the Proposed Budget Tiers, in the future, if any Tier 2 (subbasin-specific) fee is properly supported by preponderance of the evidence, the Board cannot allocate such a fee between agricultural and municipal users based on estimates of the average proportion of pumping by each of these classes of users in the Basin as a whole. Such an approach would lead to absurd results. For example, in the Monterey Subbasin, agriculture constitutes only 19% of the production based on a ten-year average and municipal uses account for 81% of the production. If the GSA were to imposes a subbasin-specific fee on the Monterey Subbasin using the 90% estimate, agriculture would carry 90% of the fee in the Monterey Subbasin or $101.78 per irrigated acre, compared to $10.03 per connection for municipal uses. Whereas if the fee is allocated

based on the actual 19/81% split, the fee for agriculture would drop to $29.62 per irrigated acre with municipal users paying $48.96 per connection.

To avoid all of these problems and inequities, the GSA Board should direct GSA staff to allocate all 2023/2024 fees on a Basin-wide basis—e.g., as Tier 1 fees. Alternatively, the GSA could implement fees on all groundwater production Basin-wide to support its regulatory efforts.

Respectfully submitted,

Christopher R. Guillen

cc: Leslie Girard, Monterey County Counsel (GirardLJ@co.monterey.ca.us)
Piret Harmon, SVBGSA General Manager (harmonp@svbgsa.org)
Sara Hardgrave, SVBGSA Assistant General Manager (hardgraves@svbgsa.org)

Exhibit A

aquilogic, Inc.
environment ● water ● strategy

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MEMORANDUM

VIA E-MAIL – MEYERSD@SVBGSA.ORG; BOARD@SVBGSA.ORG

To: Salinas Valley Basin Groundwater Sustainability Agency
180/400-Foot Subbasin Implementation Committee
168 W. Alisal Street, 3rd Floor
Salinas, CA 93901

From: Robert H. Abrams, PhD, PG, CHg, Principal Hydrogeologist, aquilogic, Inc.
Anthony Brown, CEO and Principal Hydrologist, aquilogic, Inc.

Date: April 5, 2023

Subject: April 6, 2023 180/400 Foot Subbasin Implementation Committee Meeting—Agenda Item No. 4.d re 180/400-Ft Aquifer Subbasin Water Year 2022 Annual Report
Project No.: 018-09

Aquilogic, Inc. (**aquilogic**) is pleased to provide this memorandum on behalf of the Salinas Basin Water Alliance (Alliance). The memorandum transmits our comments on the text of the water year (WY) 2022 Annual Report (Annual Report), prepared by the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) and previously submitted to the California Department of Water Resources (DWR). The public process (or lack thereof) for developing the Annual Report is also discussed.

Aquilogic's understanding is that the Annual Report, at least in part, is meant to be a data report without subjective interpretation.[1] However, "*From 2019 through 2022, California experienced the driest three years on record…*"[2] Therefore, a mere presentation of data and recitation of groundwater conditions, as they relate to sustainable management criteria (SMC), obfuscates the relationship between groundwater conditions and the effects of a historic drought. It should be noted Governor Gavin Newsom has issued multiple executive orders over the last two years related to ongoing drought, including Executive Order N-7-22, issued in WY 2022.

Aquilogic recommends that all statements regarding undesirable results should be caveated with language referring to severe drought. Such language should be used throughout the report, including in the Executive Summary. For example, the Sustainable Groundwater Management Act (SGMA) specifically states that at least two undesirable results are mitigated by drought conditions:

[1] Emily Gardner (SVBGSA), personal communication, 4/5/2023.
[2] https://www.mwdh2o.com/how-we-plan/drought/

"Per CA Water Code §10721 (X)(1), Overdraft during a period of drought is not sufficient to establish a chronic lowering of groundwater levels if:

- *extractions and groundwater recharge are managed as necessary to ensure that reductions in groundwater levels or*
- *storage during a period of drought are offset by increases in groundwater levels or storage during other periods"*[3]

Such allowances and language for drought conditions should also be considered for the seawater intrusion (SWI) SMC, given that the measurable objective (MO) for SWI is to push seawater-intruded groundwater back to Highway 1. That is, there is an expectation in the groundwater sustainability plan (GSP) that seawater intrusion is reversible.

Additional specific comments include:

- PDF p. 12: "*To the east, hydraulic connectivity **is** restricted by depositional changes along the border with the Eastside Aquifer* [emphasis added]." **Aquilogic** is not aware of any third-party reports that make this claim, other than to state that a geologic facies change occurs at the border. In fact, groundwater elevation data and statements in the SVBGSA GSPs strongly suggest a high degree of hydraulic connectivity between these two subbasins. The degree of restriction, if any, has not been quantified scientifically.

- PDF p. 31: "*Meanwhile, groundwater elevations for the Deep Aquifers have continued to decrease with too little data to establish any spatial pattern*." This is a gross oversimplification. Members of the Alliance have depth-to-water data for deep wells that indicate stable to increasing groundwater levels over the last few years.

- PDF p. 40: "*The storage loss due to changes in groundwater elevations using the aquifer-specific approach is 2,200 AF/yr. in the 180-Foot Aquifer and 1,100 AF/yr. in the 400-Foot Aquifer. The storage loss using the Subbasin-wide approach is approximately 20,600 AF/yr. The total storage change in the individual aquifers do not sum to the Subbasin-wide storage change. The remaining loss in storage **possibly** occurs in the Deep Aquifers or in the shallow sediments above the 180-Foot Aquifer, which are not designated as principal aquifers* [emphasis added]." The disparity in the storage-loss calculations is striking: 3,300 AF/yr versus 20,600 AF/yr. The lower value is only 16% of the higher value. The storage-loss estimate is far too important to be waved off with a "possibility." Additional language is needed to place these values into context. For example, as stated on PDF p. 12, "*Vertically, the shallowest water-bearing sediments are not considered a principal aquifer because they are thin, laterally discontinuous, and a minor source of water*." Therefore, these estimates

[3] Sustainable Groundwater Management Implementation: Presented by your DWR Basin Point of Contacts, 2023.

essentially state that there was 17,300 AF of storage loss in the Deep Aquifers in WY 2022. Such a storage loss is unsubstantiated and not supported by scientific evidence.

- PDF p. 45: "*The area of change from 2021 to 2022, shown as the red shaded area on Figure 19, was multiplied by an assumed aquifer thickness and effective porosity of 0.12 to estimate the average annual loss of groundwater storage due to seawater intrusion. Storage coefficients are more representative of the quantity of the water that can be drained from an aquifer. Since seawater is moving into the aquifer, an effective porosity is more appropriate for this calculation*." The specific yield, referred to as "effective porosity" in the Annual Report is the appropriate storage parameter for unconfined aquifers. The red-shaded areas referred to in the Annual Report occur in confined aquifers, which contain much lower volumes of stored water relative to head measurements than unconfined aquifers. In confined aquifers, the specific storage is the appropriate storage parameter. If the SVBGSA believes that specific yield is the more appropriate parameter, the reasons and justifications for its use should be documented (i.e., the Annual Report should cite the proper literature).

- The discussion of interconnected surface water (ISW) should elaborate on the potentially high level of uncertainty due to using one well to measure this SMC. Perusal of the GSP for the Forebay Aquifer Subbasin indicates three ISW wells for that subbasin. The GSP for the Upper Valley Subbasin has four ISW wells for that subbasin. Language regarding severe drought should also be added to the Annual Report.

Lastly, there did not appear to be a stakeholder/public process for the development of the Annual Report (i.e., a draft version was not circulated to the public). **Aquilogic** believes that the issues outlined above could have been resolved if a draft document had been provided for comment.

Exhibit B

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November 9, 2022

MEMORANDUM

To: Salinas Valley Basin Groundwater Sustainability Agency

From: Robert H. Abrams, PhD, PG, CHg, Principal Hydrogeologist, aquilogic, Inc.
Anthony Brown, CEO & Principal Hydrologist, aquilogic, Inc.

Subject: Subbasin Hydrological and Hydraulic Interconnectivity

Project No.: 018-09

Aquilogic, Inc. (**aquilogic**) is pleased to provide this memorandum on behalf of the Salinas Basin Water Alliance (SBWA). The purpose of the memorandum is to provide a brief summary of previous investigations and data that indicate the subbasins of the Salinas Valley Groundwater Basin (SVGB) are hydrologically and hydraulically connected.

Evidence for subbasin interconnectivity is found in multiple reports that span decades.[1] For example, Bulletin 52 (DWR, 1946), in describing Salinas Valley Basin hydrology, stated unequivocally that, "*All information collected during the investigation indicates the ground waters therein are interconnected with the exception of possible instances of closed lenses in the East Side Area and a more or less effective ground water barrier immediately south of Moro Cojo Slough.*" Furthermore, the Salinas Valley Ground Water Basin Hydrology Conference (SVGWBHC, 1995), a panel of experts on Salinas Valley groundwater convened by the Monterey

[1] DWR (1946). Salinas basin investigation. Department of Public Works, Division of Water Resources. Bulletin 52. (Note, a subset of Bulletin 52 that contains the relevant information, Bulletin 52-B, can be found here: https://www.co.monterey.ca.us/home/showpublisheddocument/19576/636232667537000000, accessed November 7, 2022.)

SVGWBHC (1995). Hydrogeology and water supply of Salinas Valley: A white paper prepared by Salinas Valley Ground Water Basin Hydrology Conference for the Monterey County Water Resources Agency. June. https://www.co.monterey.ca.us/home/showpublisheddocument/19584/636232667576070000, accessed November 7, 2022.

MCWRA (2001). Draft environmental impact report / environmental impact statement for the Salinas Valley Water Project. Prepared by the Monterey County Water Resources Agency and the U.S. Army Corps of Engineers. June. https://www.co.monterey.ca.us/home/showpublisheddocument/24180/636281210678370000, accessed November 7, 2022.

Kennedy/Jenks (2004). Final report: Hydrostratigraphic analysis of the northern Salinas Valley. Prepared by Kennedy/Jenks Consultants for the Monterey County Water Resources Agency. May. https://www.co.monterey.ca.us/home/showpublisheddocument/19582/636232667568400000, accessed November 7, 2022.

Brown and Caldwell (2015). State of the Salinas River Groundwater Basin. Prepared by Brown and Caldwell for the Monterey County Water Resources Agency. January. https://www.co.monterey.ca.us/home/showpublisheddocument/19586/636232667593230000, accessed November 7, 2022.

County Water Resources Agency (MCWRA), emphasized that, "*Ground water can move between the East Side and Pressure Areas, and between the Forebay and Pressure Areas, the Forebay and East Side Areas, and the Upper Valley and Forebay Areas*." This notion of subbasin interconnectivity was again restated in MCWRA (2001) as, "*These subareas are hydrologically and hydraulically connected*" and that "*[l]andowners and other water users pumping groundwater* [from the Valley] *are drawing water from the same groundwater basin*." That is, evidence indicates that there are no barriers to groundwater flow between subbasins within the SVGB (e.g., Brown and Caldwell, 2015).

Simulations with the U.S. Geological Survey (USGS) Salinas Valley Integrated Hydrologic Model (SVIHM) also indicate that the subbasins within the SVGB are hydrologically and hydraulically connected. The water budgets developed for the Groundwater Sustainability Plans (GSPs),[2] using the SVIHM, indicate that groundwater flow occurs between all adjacent subbasins.

Additional SVIHM simulations were conducted for the GSPs by the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) to investigate potential streamflow depletion due to pumping. These simulations show that groundwater extraction, particularly in the Upper Valley and Forebay subbasins, has reduced the amount of groundwater that would otherwise flow between subbasins. The relevant evidence is found in the final GSPs, Chapters 5 and 6. It is clear from the analysis of streamflow depletion and the groundwater budgets that pumping in the Upper Valley and Forebay subbasins is capturing percolating groundwater that would otherwise flow downgradient to the 180/440-Ft Aquifer Subbasin (180/400) and the Eastside Aquifer Subbasin (Eastside), or discharge to the Salinas River and flow downgradient. Therefore, the net flow of water to the 180/400 and the Eastside has been reduced by upgradient pumping.

The SVIHM and groundwater elevation contour maps published by the MCWRA show that the natural hydraulic gradient in the Eastside has been reversed by groundwater extractions. This reversal causes groundwater to flow from the 180/400 to the Eastside, illustrating the hydrological and hydraulic connection between these two subbasins. A similar situation exists between the Monterey Subbasin (Monterey) and the 180/400, where pumping in the 180/400 causes inter-subbasin flow from the Monterey to the 180/400.

In summary, hydrological investigations by several parties, beginning in the 1940s and continuing through submittals of GSPs in 2020 and 2022, have demonstrated that the subbasins within the SVGB are hydrologically and hydraulically interconnected with each other. The SVGB is a single, unified water resource consisting of surface water and groundwater. There is no evidence that indicates otherwise.

[2] https://svbgsa.org/subbasins/