

September 3, 2025

Chair Bill Johns  
Underground Safety Board  
Office of Energy Infrastructure Safety  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, California 95814

**RE: Comments on Proposed Rulemaking Geographic Information Systems**

Dear Chair Johns:

Olivenhain Municipal Water District appreciates the opportunity to provide input on the proposed regulatory language for the use of geographic information systems in recording and mapping of new subsurface installations which, if approved, would be integrated into California Code of Regulations, Title 19, Section 4,000. OMWD provides 87,000 customers in northern San Diego County with water, wastewater, recycled water, hydroelectric, and recreational services.

The proposed rulemaking should specify how often measurements are needed and whether they are taken from the pipe's centerline. The suggested 10-centimeter horizontal positional accuracy standard is unrealistic in real-world conditions and will be difficult for agencies to meet reliably. Additionally, vertical data should also be required alongside horizontal data, to provide more accurate and complete records.

The preliminary policy also places financial and operational responsibility solely on agencies, and it does not identify any source of funding from the state. This approach overlooks the significant costs associated with implementation, data management, long-term storage, and cybersecurity risks related to centralized infrastructure data. Clarification is needed on who is responsible for data collection—whether it lies with the contractor installing the pipe or the agency owning the infrastructure. For small utility crews, adding extra data collection tasks can slow project schedules, raise labor costs, and cause delays.

The draft also mentions requirements such as FIRMs, tracer wires, and accuracy standards, but these are not clearly defined. Lack of clarity could cause operational problems. Finally, the regulation should specify if this data will replace as-built drawings from utilities and how it will be stored and shared. Many smaller and rural agencies lack dedicated GIS staff or infrastructure to support these regulations.



Thank you for the opportunity to provide feedback on the proposed regulations. Should you or your staff need any additional information, please don't hesitate to contact me at 760-753-6466 or [kthorner@olivenhain.com](mailto:kthorner@olivenhain.com).

Regards,



Kimberly A. Thorner  
General Manager