



Responses to Supplemental Questions

Kennedy/Jenks Consultants

February 13, 2018

Question 1. Please describe how you would approach an overall GSP for the Salinas Basin but with individual discussions or approaches for the subbasins.

The Sustainable Groundwater Management Act (SGMA) requires Groundwater Sustainability Plans (Plan) give specific treatment of defined subbasins and management areas, including use of common methods, data and assumptions. This work will include:

- 1) Providing content on the physical setting and characteristics of the basin/subbasin
- 2) Utilizing a descriptive hydrogeologic conceptual model of the basin/subbasin, which would be consistent with, and apply the conceptual model created during development of the OneWater MODFLOW model for the Salinas Basin. This also includes identifying and confirming the data gaps for each subarea as identified by the USGS and with the input from the model development Technical Advisory Committee (recently disbanded)
- 3) Providing a water budget. It is assumed that the MODFLOW model will be the tool to:
 - a) quantify historic basin wide and subarea water budget and define historic baseline conditions,
 - b) quantify the undesirable effects per SGMA,
 - c) identify the subarea water budget impacts and benefits of proposed projects and programs for the GSP for both the historical baseline conditions and future without project conditions;
 - d) compare alternatives
 - e) evaluate the subarea water budget effects of climate change

This work will include identifying Water Available for Recharge (WAFR) from/to each subarea, including flow from the upper Salinas River watershed in San Luis Obispo County; from the operations of Nacimiento and San Antonio reservoir, and any current or proposed operational rules and any proposed new reservoir facilities (tunnels, upstream dams); and the water available under water rights Permit 11043.

- 4) We will use basic historical data and the MODFLOW model to provide a description of current and historical groundwater conditions in the basin/sub-basin, including, at minimum, data from January 1, 2015, to current conditions (groundwater elevations, change in storage, seawater intrusion conditions, groundwater quality issues, area and extent of land subsidence, identification of surface water systems, and identification of groundwater dependent ecosystems in the basin);
- 5) Defining undesirable results applicable to the basin/subbasin
- 6) Establishing minimum thresholds that quantify groundwater conditions for each applicable sustainability indicator at each monitoring site or representative monitoring site in the basin/subbasin;
- 7) Establishing measurable objectives, for each sustainability indicator, including interim milestones in increments of five years, to achieve the sustainability goal for the basin/subbasin within 20 years
- 8) Describing a reasonable path to achieve the sustainability goal for the basin/subbasin within 20 years of Plan.

Our communications plan (CommPlan) will identify the key decision makers and influencers in each of the subareas, along with the related organizations or groups that will provide communications channels (e.g.; Salinas Valley Water Coalition; Grower Shipper; etc.) to the specific subbasins in the Salinas Valley. This work can build on the recent outreach work of our team members (Zidar, Feeney) which developed the outreach plan for the model and coordinated the prior model development Technical Advisory Committee (TAC). This group was recently disbanded. We strongly endorse reforming a TAC of experts with knowledge and experience in the Salinas Valley. This group would be important for peer review,

advising the SVBGSA Advisory Committee and Board, and as a mechanism for resolving technical matters and bracketing uncertainty.

The CommPlan will also document the methods used to provide access to data and modeling results, and how the information will be provided in understandable formats using appropriate figures, tables and maps to summarize results and compare alternatives. Our team is expert in being able to document work at multiple levels, presenting information in lay persons terms, but also providing technical, defensible levels of detail and build an administrative and evidentiary record.

Because of these SGMA requirements described above, it is necessary to make information for each DWR-defined basin/subbasin easily identifiable in the Plan. Our approach, for each Plan section, would be to provide information for the Basin as a whole and then specific information for each subbasin. For example the Plan Area and Basin Setting section will describe the Salinas Valley Groundwater Basin (SVGB) as a whole from the from the south (“upstream”) to the north (“downstream”)and then will have specific subsections for each defined basin. In the Water Budget section of the Plan, the overall water budget for the Salinas Valley Basin will be provided, followed by Water Budget sections for each subbasin. This “template” approach could allow for development of subbasin GSPs should that become necessary to respond to local decisions.

Working with the SVBGSA, the Kennedy/Jenks Team will propose a definition of undesirable result common to all basins. Development of the sustainability criteria is subbasin-specific as SGMA requires criteria be correlated to a given monitoring location. To expedite preparation of the sustainability criteria, our approach in the Planning Grant Application was to use three representative monitoring sites for each subbasin. Additional monitoring sites and updated information could be considered during future Plan amendments.

To meet the January 2020 deadline, our approach would be to start on the sustainability criteria for the critically overdrafted basins first, including the Pressure (180/400 foot aquifers) and as necessary the Paso Robles Area subbasin, before starting the sustainability criteria for the other basins (East Side Aquifer, Forebay Aquifer, Upper Valley Aquifer, Langley Area, and Monterey)Development of the sustainability criteria for the other basins would build on lessons learned preparing the criteria for the critically overdrafted basins. Due to the subbasin specific nature of the sustainability criteria, the stakeholder outreach will be held in locations appropriate for the subbasins. The Plan information for the critically overdrafted basins could be completed as the sustainability criteria for the medium and high priority basins are under development.

Question 2. Please describe how you would approach a management area agreement with the Marina Coast Water District for management of a portion of the Monterey subbasin.

Under SGMA, when there are two GSAs covering a single basin they must either work together to develop a single GSP for the entire basin, or develop multiple GSPs that utilize the “same data and methodologies” for core plan elements, including hydrogeologic conceptual models, conditions of the basin, water budgets, undesirable results, monitoring networks, and projects. GSAs must create a “coordination agreement” specifying their roles and responsibilities, and outlines procedures for the timely exchange of data and the resolution of conflicts. Further, a single entity must serve in a coordinating role, synthesizing data about basin conditions from all GSPs into a single report for submission to DWR. An early task in the GSP process will be to enter into a Coordination Agreement with Marina Coast Water District (Marina Coast) to resolve these details.

SGMA allows for the establishment of management areas for scientific and jurisdictional reasons. Scientific justification includes the extent of a barrier or fault, the location of salinity plumes, or the presence or absence of major aquifers. Jurisdictional management areas may be created to match management of an area to the jurisdiction of a local agency. The SVBGSA has taken the position that GSAs outside of jurisdictional boundaries cannot be recognized under SGMA and has requested DWR make such a finding related to the Marina Coasts’ claim to have authority over portions of the Marina and Ord subareas. DWR was not committal in its response and it is necessary to move forward with development of a GSP. Our recommendation would be to set up a Management Area covering the Marina and Ord subareas to be managed by Marina Coast with the remainder of the Monterey subbasin (the Corral de Tierra) in a Management Area covered by the SVBGSA.

We would recommend tackling the Coordination Agreement in stages, first identifying potential other stakeholders (eg Ft. Ord Authority and Monterey County Water Resources Agency) as well as settling the specific geography and boundaries. Then working on coordinating data and methodologies. SVBGSA should request facilitation services from DWR to assist with these coordination agreements – to provide an independent third party. The presence of DWR and a facilitator would document the lack of cooperation if it were to occur, which will be important should it be necessary to compel DWR to make a jurisdictional decision. A potential “carrot” in the negotiations would be for SVBGSA to offer to do the work of running the SVIHM, providing data from the SVIHM, and offering to take on the responsibility of doing the annual reporting to DWR.

3. Please describe how you would address management of the Paso Robles subbasin if our GSA cedes primary responsibility for that subbasin to the San Luis Obispo County GSAs in the Paso Robles subbasin.

Chapter 5 of the SGMA legislation defines the Powers and Authorities of GSAs that include Section 10726.4.(b) Additional Authorities of Groundwater Sustainability Agency which states “This section does not authorize a groundwater sustainability agency to issue permits for the construction, modification, or destruction of groundwater wells, except as authorized by a county with authority to issue those permits.” Therefore, it is not clear whether Monterey County agencies would authorize a GSA outside of the County to regulate groundwater wells, nor allow groundwater sustainability planning by an entity from outside Monterey County.

Even without the potential limitations of authority of a GSA, we would not recommend that the SVBGSA cede primary responsibility over the portion of the Paso Robles subbasin located within Monterey County to the San Luis Obispo County GSAs (Figure 1). The Paso Robles subbasin is separated from the



Figure 1 – Paso Robles Subbasin inside the Salinas SVBGSA

Upper Valley subbasin by a boundary that is the approximate projection of Sargent Creek, a location where the Salinas Valley is constricted. This boundary is not a structural one (e.g., geologic). Groundwater and surface runoff from the Paso Robles watershed recharge the Upper Valley aquifer system (Figure 2). Because of this inextricable linkage of the surface water in San Luis Obispo County with the groundwater in Monterey County, it is important that any proposed management actions by the San Luis Obispo County GSA (SLOGSA) towards the goal of sustainability in the Paso Robles groundwater subbasin be coordinated with the SVBGSA. The Paso



Figure 2 – 2014 Paso Robles Groundwater Basin and Watershed

Robles subbasin has experienced rapid expansion of agriculture in recent years, and is one of 21 basins in California that are considered to be critically overdrafted, as well as being a high priority basin. We think that, considering the status of the Paso Robles subbasin and the nature of its boundary with the Upper Valley subbasin, that it would be in the interest of the SVBGSA to retain responsibility over those portions of the Paso Robles subbasin currently under SVBGSA control (Figure 1).

In addition to the non-structural boundary, we feel that any attempt by the SVBGSA to cede primary responsibility over its portion of the Paso Robles subbasin could not only be counter to SGMA legislation but also raise concerns from the County of Monterey

and MCWRA, who would likely prefer that a Monterey County-based entity continues to have control over the groundwater resources of the Monterey County portion of the subbasin.

Regardless of whether the SVBGSA were to move forward with ceding primary responsibility over the

Figure ES-8. Change in Layer 4 Groundwater Elevations (2012-2040) – Model Run 1

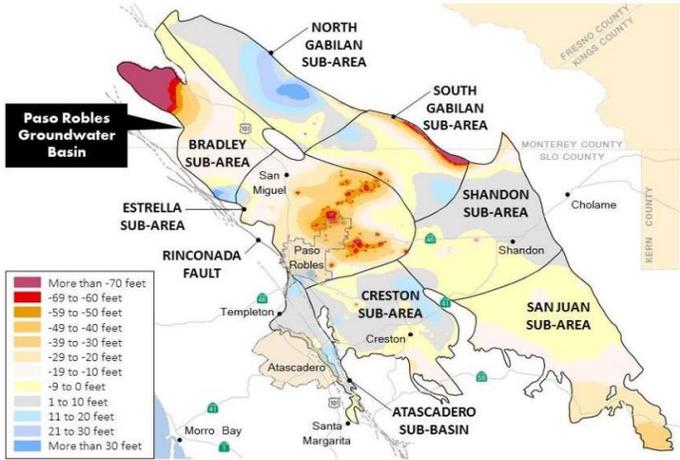


Figure 3 – 2014 Paso Robles Groundwater Model Update

Monterey County portion of the Paso Robles subbasin, the SVBGSA should seek to protect Monterey County interests in preparation of the Paso Robles subbasin GSP. The cooperative agreement being developed between the SVBGSA and the SLOGSA should contain the following recommendations:

- Sharing of groundwater model inputs and outputs (model boundary in Figure 3);
- Open discussions on proposed projects and management actions;
- Sharing of groundwater elevations and minimum threshold monitoring locations, likely at the County-line which is also the boundary between both GSAs as currently submitted to DWR.

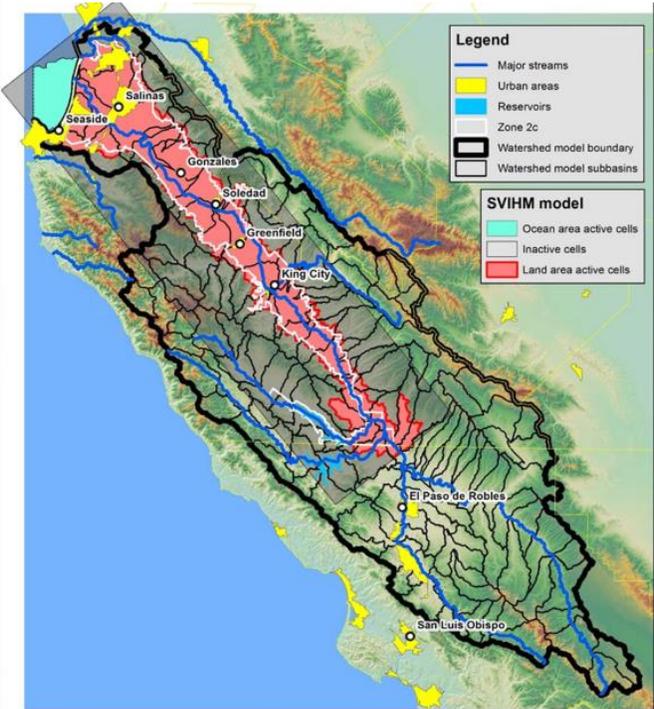


Figure 4 – Salinas Valley Integrated Hydrologic Model Watershed Boundary

The cooperative agreement should also allow the SVBGSA the right to review the administrative drafts of the Paso Robles subbasin GSP, specifically the development of Sustainability Criteria in the Monterey County portion of the subbasin and/or at the Monterey County boundary.

The SVBGSA should be allowed conduct joint working groups with the modeling team of the Paso Robles subbasin in the use of the SVIHM model which encompasses most of the Paso Robles subbasin watershed (Figure 4).

Since there is so much needed interactions between the two GSAs, it is conceivable that a Joint Powers Agreement (JPA) can be formed for only the portion of Paso Robles subbasin. This would allow for the two GSAs to coordinate closely on development of the two separate GSPs and in implementation of management actions and projects to benefit the Paso Robles subbasin.

Q4. Please describe how you would address the intersection of our GSA's authority to that of the Water Resource Agency's authority, especially with respect to operation of the dams at the two reservoirs and the ordinances for well destruction

The Kennedy/Jenks Team has every indication that MCWRA wants to work in coordination with the SVBGSA to achieve sustainability goals as a Memorandum of Understanding (MOU) is currently being prepared by the Agency and SVBGSA. On behalf of all water users in the Salinas Valley, MCWRA maintains the storage and flow rights managed through Nacimiento and San Antonio Reservoirs, and has authority over operation of the reservoirs and dams, so any solution that may require modifications to current reservoir release schedules will have to be developed in cooperation with MCWRA. Specifically, in compliance to the 2013 settlement agreement on the litigation of the Hydrology Section of the 2010 County General Plan, the MCWRA is committed to develop and rely on the Salinas Valley Integrated Hydrologic Model (SVIHM; the MODFLOW model developed by the USGS) as the primary tool in a holistic approach to managing the; two reservoirs, Salinas River aquatic habitats, water right diversions, and mitigating measures of sea water intrusion (SWI). The Arroyo Seco Water Right 11043 is also currently held and maintained by the Agency for the benefits of the water users and should be managed as a community asset. Between the SVBGSA and the MCWRA, the area has appropriate powers and authorities to sustainably manage the available surface and groundwater supplies through the SVGSP.

Current Approach to Reservoir Operations - Projects and management actions that the SVBGSA proposes in the GSP may or may not require modifications of the reservoir operational rules that MCWRA has developed and updated in anticipation of the construction of the Interlake Tunnel. Amec Foster Wheeler is currently contracted with the MCWRA to develop and run the SVIHM model scenarios in support of the Interlake Tunnel design, operations, and environmental review. Our model runs will also simulate how MCWRA's operation of the reservoirs will respond to SVGSP related projects or management actions considered by the SVBGSA. The San Antonio and Nacimiento Reservoirs are multipurpose facilities that provide water storage, flood control, hydroelectric and recreational benefits. These facilities must be operated for flood control in context of the flows from the upper Salinas Valley, Arroyo Seco and other local watersheds to avoid flood damage and to quantify Water Available for Recharge (WAFR) through in lieu or direct methods. Our team has members that have directed the operations of the reservoirs during flood control and water supply operations and we are very familiar with the opportunities and constraints inherent in the Salinas Watershed.

Collaboration – Based on our experiences in the Salinas Valley, we are optimistic that the intersection of authorities with the SVBGSA and MCWRA is a non-issue. The preparation of the GSP will indeed require the collaboration of both agencies and it is to be based on technical information. The foundation for the GSP collaboration was set in motion under the 2010 General Plan Settlement Agreement from 2013 whereby it was agreed that the MCWRA must develop quantitative tools (i.e. SVIHM) to manage the Salinas Valley groundwater basin. These quantitative tools will be used to manage the basins such that it is brought back into hydrologic balance, will mitigate SWI, and account for climate change; hence, all part of SGMA concept of sustainability and avoidance of undesirable results.

MCWRA Recommended Approach to Water Well Permitting - MCWRA has already shown a desire to implement moratoria on well installation, and recommended destruction of various wells in the Report:

Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin Report (MCWRA, 2017). The authority for a moratorium on construction of new wells likely rests with MCWRA's ability to approve all well installation permit requests. According to the SWI Recommendations report, MCWRA has authority under County Ordinance #3790 to destroy wells (whether or not the owner desires it) within Zone 2B.

On November 8, 1994 the Board of Supervisors of the Monterey County Water Resources Agency approved Ordinance No. 3790. Below are partial excerpts of the ordinance.

An ordinance of the Monterey County Water Resources Agency establishing the regulations for the classification, operation, maintenance and destruction of groundwater wells in MCWRA Zone 2B, to protect the Salinas Valley Groundwater Basin against further seawater intrusion.

After the start-up of the Castroville Seawater Intrusion Project, no person shall own, operate, or maintain a well in Zone 2B if such well is required to be destroyed, in violation of such destruction requirement, and no person shall interfere with actions taken by the MCWRA to accomplish the destruction of such a well in conformity with this ordinance.

Ordinance No. 3790 further instructs that any well not exempt from destruction shall be destroyed by the Agency once (a) the Castroville Seawater Intrusion Project has established a satisfactory record of water deliveries, as determined by the Board of Directors, or (b) until at least one year after the start-up of the Castroville Seawater Intrusion Project, whichever occurs later. The cost of said well destructions shall be borne by the Agency (§1.03.05).

The MCWRA will have to bear the costs so they have been seeking funding to destroy some of the 142 wells subject to the ordinance; 35 wells, located in the 180/400 Aquifer were ranked either Urgent or High. All the considered wells in the Deep Aquifer were ranked as Minimal priority for destruction.

Cooperation Between SVBGSA and MCWRA - It is our belief that the MCWRA will exercise its authority in permitting the installation and destruction of water wells with openness and fact based rationale. They have staff with the appropriate geologic/engineering registrations required under state law. The issue of overlapping authorities between the two agencies is muted; both agencies have the same goal of curtailing the advancement of SWI and the reduction of contaminated wells which are part of groundwater management sustainability.

5. Please describe how you would recommend utilizing 11043 water based on circumstances as you know them today.

The use of water rights Permit #11043 is perhaps the single most important project under SGMA, as it provides a surface water source for direct and/or in-lieu groundwater recharge that allows for reduced pumping, increasing groundwater levels and helping control Sea Water Intrusion (SWI), as detailed below. In 2013, MCWRA asked for a delay in proposing project for Permit #11043 in order to pursue another high-priority project. As a result of the prolonged drought, the fast-track design and permitting of the Interlake Tunnel construction rose in priority; the Interlake Tunnel will also be a major project in the Salinas Valley Basin Groundwater Sustainability Plan (GSP). Les Chau and Matt Ballie were the Lead Investigators in modeling support for the Interlake Tunnel project and, at the time, also for support of the Permit 11043 Environmental Impact Report (EIR) that was planned to be completed by June 2017. There was not sufficient funding to prepare the Permit 11043 EIR at that time. Permit 11043 allows for appropriation of water from the Salinas River, at a rate not exceeding 400 cfs, with an annual maximum diversion amount not to exceed 135,000 acre-ft/yr.

Undesirable results to be addressed with 11043 water rights include

- a) seawater intrusion in the Pressure area, including the 180/400-Foot aquifers;
- b) declining groundwater levels and storage depletion in the East Side and potentially portions of North Monterey,
- c) Nitrate contamination in the unconfined aquifers in the North County, East Side, Forebay and Upper Valley; and
- d) highly variable groundwater levels in the Forebay and Upper Valley.

Constraints to achieving additional yield from the 11043 water rights are related to the lack of Arroyo Seco surface water storage; episodic (flood) and seasonal (winter) variability of flow; limited groundwater storage capacity in the Forebay, Pressure and East Side; limited distribution systems infrastructure, and the ability and/or willingness to pay for infrastructure in the potential service areas, including the Pressure, Forebay, East side and North County. The KJ Team is unique in its engineering capability and extensive infrastructure design capacity.

Approach to Beneficial Use of Permit 11043 Water Rights in a SGMA Context

To address undesirable results, the SVBGSA Board would consider and adopt broad goals for beneficial use of 11043 water right The Kennedy/Jenks Team agrees with the conceptual uses proposed to the State Water Resources Control Board by MCWRA for Permit 11043 water, but would expand on these to allow for consideration of a broad range of alternatives, and to compare both systems wide and subbasin impacts and benefits. Example goals could include:

- Use existing or expanded distribution system, or construct new infrastructure, to provide 11043 water in lieu of pumping to areas currently relying on 180/400-Foot pumping and contributing to SWI;
- Provide water for in lieu use and/or for direct recharge to the Eastside and North County to address declines in groundwater levels and storage depletion;
- Provide an additional source of clean, freshwater recharge to the Forebay to address nitrate contamination, stabilize groundwater levels, and increase the yield of 11043 through groundwater storage;

- Allow for reoperation of Nacimiento and San Antonio Reservoirs to optimize reservoir optimize system-wide operations, increase groundwater storage of water currently lost to the ocean, best manage Salinas River flows consistent with the river management program (and pending HCP), reduce the impacts of drought, improve groundwater recharge and help stabilize groundwater levels in the Upper Valley and Forebay.

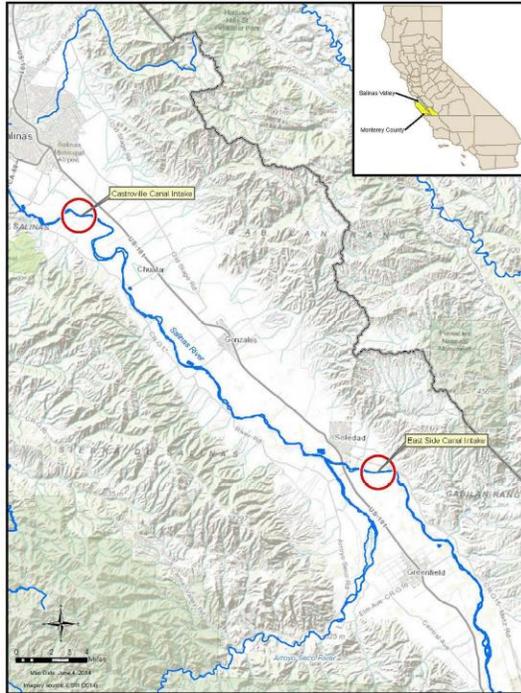
Measurable objectives would be set to prevent undesirable results, and be based on defined monitoring metrics that can be used to track progress in meeting the stated goals, and SGMA requirements for establishing sustainability indicators, thresholds and milestones.

A wide range of **alternative projects** would then be configured to evaluate how to meet the stated goals and measurable objectives. Alternatives will be formulated to meet current and planned agricultural and municipal beneficial uses consistent with existing land use plans. The California Water Code requires that the use of 11043 water right not harm existing beneficial users or the environmental. Under state law, developing the 11043 water right will require definition of **final points of diversion, place of use and types of use** (agricultural, urban).

This includes variants for:

- Point and method of diversion – this could include alternatives diversion locations and methods (in stream, Rainey collectors, well fields);
- Place of Use- this would include defining service areas (in lieu use), distribution infrastructure (canal, pipeline), and/or direct recharge facilities (injection wells, spreading basins, releases down natural stream channels). This could include expanding the existing coastal distribution system or creating new service areas and systems.
- Type of Use- agricultural, urban, in-stream flow, etc. This could include development of surface water treatment facilities to allow municipal use of Arroyo Seco and/or Salinas River surface water under the state and federal surface water treatment rules.

Project alternatives would be configured, evaluated and compared to define, the increased yields, costs and benefits. This includes defining the operational requirements and schedules and evaluating the effects on the operations of existing facilities (Nacimiento, San Antonio, SVRP and CSIP); evaluating the water budgets effects from proposed project a on the subbasins using the SVIHM; application of a SVBGSA Board adopted evaluation criteria would be used to rank and prioritize alternatives, and evaluation of costs/benefits by subarea. This later economic analysis by the financial of a preferred alternative would be needed so support a 218 initiative. We would build upon prior work to leverage the previous investments.



Salinas Valley Water Project, Phase II - Project Location Area

Specific Uses for Permit 11043 Water Rights

Current Technical Option A - The Salinas Valley Water Project, Phase II (SVWP II) would use Permit 11043 water through two surface water diversion points and their appurtenant facilities for capture, conveyance, and delivery of large quantities of water. One diversion point is located near the City of Soledad (called the East Side Canal Intake in the permit) and the other is located south of the City of Salinas (called the Castroville Canal Intake in the permit).

Many of the details surrounding SVWP II will be evaluated in an alternatives analysis for an EIR, and a suitable alternative will be selected as a result of the review process. The capture and diversion facilities will consist of either a surface water diversion facility, similar to the existing Salinas River Diversion Facility, or Ranney® Collector Wells. The conveyance facilities will be either above- or below-ground pipelines and pump stations. In part, an EIR

will be used to analyze the configuration, location, and physical layout of the conveyance facilities.

Delivery facilities may consist of injection wells (as part of an aquifer storage and recovery system), percolation ponds, or turnouts for direct use of the water (i.e., in-lieu recharge). The delivery facilities may incorporate treatment of the water or, alternatively, MCWRA may deliver raw water to be treated by the end-user in a manner suitable for the intended application (for example, agricultural or urban use).

Direct Injection of 11043 Water: Passive recharge projects, such as using in-lieu recharge to replenish the aquifer, would raise water levels at a relatively slow rate, depending on how much pumping is curtailed as a result. In-lieu recharge is a cost effective alternative, but could take on the order of decades to raise the water levels sufficiently to reverse the groundwater head gradient and thereby mitigate SWI. It is unknown how DWR will react to a submitted GSP that allows for continued landward movement of a SWI front even as steps are taken to address the problem.

Alternatively, the managed aquifer recharge (MAR) technical option, accomplished using direct injection wells or spreading basins, could be a faster way to raise water levels in the affected aquifers. However, direct injection of surface water would require a regulatory approach that is much more difficult than that required for in-lieu recharge, as well as much higher costs, as new wells would have to be drilled as injection wells, or existing wells retrofitted to operate as injection wells. A conveyance and temporary water storage system may be needed with capital costs to use the Permit 11043 water. An area of the Eastside Aquifer subbasin is currently being assessed for MAR, but it is located about four miles away from the Salinas River.

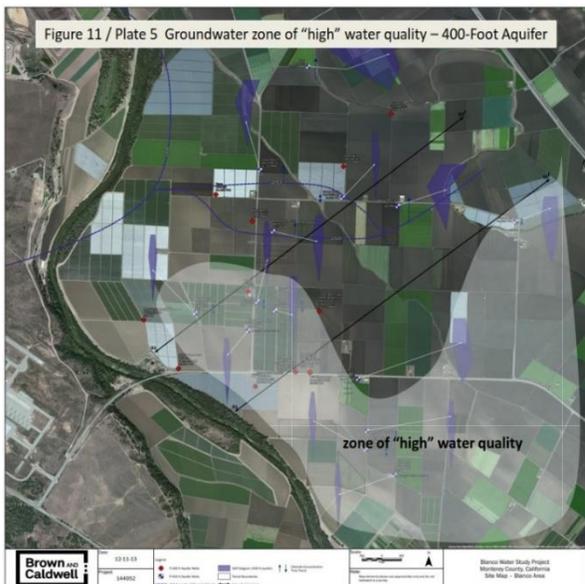
When considering direct injection as an option, we will focus hypothetical injection in areas just landward of the seawater intrusion front so that a local seaward head gradient can be created. This would also promote blending of high-quality injected water with groundwater in the immediate vicinity of the intrusion front, helping mitigate past intrusion and quickly improving water quality in the area of the intrusion front. Additionally, the 400-Foot aquifer in the 180/400-Foot Aquifer

Subbasin would be an area of focus, to try to reverse downward hydraulic gradients from the 180-Foot aquifer that are currently driving seawater into the 400-Foot aquifer. The direct injection approach would not preclude also developing in-lieu recharge as a long-term solution to seawater intrusion.

Other Conjunctive Use - Small-scale near-source diversions and blending of surface water. The Kennedy/Jenks Team also recommends the planning of additional diversion locations at much smaller scale than the SVWP II. These are low-cost options compared to MAR by injection wells. One in-lieu recharge approach relies on reduced pumping in the 180/400-Foot Aquifer subbasin in exchange for increased use of Salinas River water, allowing for natural recovery of water levels in the aquifer.

The optimal (and perhaps priority) locations for small scale diversion, primarily for irrigation, would be in the areas of high water quality groundwater in the 180- and 400-Foot aquifers. In these areas, Salinas River water can be surface blended (at well heads) with currently high-quality groundwater for irrigation. This technical option is not designed to directly address the current SWI in the 180/400-Foot Aquifer subbasin but it is meant to curtail pumping in focused areas underlain with groundwater landward of the intrusion front to slow and stop the advancement of the intrusion front by raising water levels and concurrently manage irrigation water quality by blending surface water and groundwater. This type of Permit 11043 water use also requires rigorous analysis and may not be appropriate in areas where direct injection may have larger regional benefits.

As an example of this small scale approach, Les Chau conducted a confidential study in 2014 in the



Blanco Area for this purpose (see adjacent Figure). Extensive subsurface mapping, using well logs and water quality information, was conducted to look for preferential pathways of seawater intrusion. The 3D mapping rendered a surface expression of high quality water zones landward (south) of low water quality, seawater blended groundwater. Small-scale and seasonal diversion can be located next to the Salinas River, with low buildout costs for pipelines to existing agricultural wells for blending of surface water and groundwater. This would curtail the pumping of groundwater in both the SWI zones and in the high-quality groundwater zones. This area is only one of many that can be considered for small-scale diversions of Permit 11043 water.

Question 6. Though SGMA says the GSP is exempt from CEQA there are many opinions about when and how CEQA may become activated in the planning process. Please describe the relationship, as you understand it between SGMA and CEQA.

The preparation of a Groundwater Sustainability Plan is specifically exempt from CEQA (see Water Code Section 10728.6). This is consistent with CEQA Guidelines which state “A project involving only feasibility or planning studies for possible future actions which the agency, board, or commission has not approved, adopted, or funded does not require the preparation of an EIR or Negative Declaration but does require consideration of environmental factors. This section does not apply to the adoption of a plan that will have a legally binding effect on later activities (CEQA Guidelines Section 15262).” A GSP, which identifies possible management actions to achieve sustainability is essentially a feasibility study. However, before management actions/projects are approved for implementation or adopted, or funded the management actions/project would be considered a project under CEQA and will require CEQA review. The agency undertaking an implementation project (e.g., funding, reviewing the design, and ultimately managing the project once built) is typically the agency responsible for conducting CEQA. However public agencies with discretionary permitting authority or who provide funding to a project act as responsible agencies under CEQA. As a Joint Power Agency, the Salinas Valley Basin Groundwater Sustainability Agency can likely be considered a responsible agency for the purposes of CEQA compliance.

The screening of alternatives will need development of specific SVBGSA criteria (social, legal, economic, environmental, etc.) to rank and prioritize alternatives and select a preferred alternative or suite of actions. We will help the SVBGSA develop environmental criteria that will help avoid or mitigate potential impacts during the screening of alternatives. This has helped us to support cost-effective CEQA review for projects which subsequently advance to a design level of detail.

The water budget and modeling results will give an assessment of the historical baseline and of the future “without project conditions” and serve as a cumulative impact analysis under the currently proposed land use plans and levels of development proposed. The MODFLOW model and the compiled data will provide basin scale common methods, data, and assumptions with which subsequent CEQA analysis for SVBGSA or any other local project sponsor can leverage to expedite the information for subsequent detailed environmental review. The compiled information will provide an administrative and evidentiary record that can be applied should projects be determined “ready to proceed” pursuant to CEQA. Our team has experience in developing documents, models and data sets such that they will provide the SVBGSA and project sponsors with flexibility to leverage the investments in preparing future programmatic or project specific EIRs.