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2	8-1	180/400					5/2/19	Director Secondo	Director Secondo suggested including the seven percent in Chapter 8 also as a reference to how it compares to the 112,000 acre feet future long-term sustainable yield		Comment incorporated into Chapter 8	5-2-19 Planning Committee Minutes_Chapter 8
3	8-2	180/400					5/2/19	Tom Virsik	Tom Virsik wrote a letter of concern about the chapters not being completed in order, because it is difficult for the Board to make policy decisions. He questioned whether the DWR would find that the process is transparent with incomplete information	Comment noted	No change to Chapter 8	5-2-19 Planning Committee Minutes_Chapter 8
4	8-3	180/400			11		5/2/19	Director Brennan	Stated that the text is unclear on page 11 as to whether 2003 is the measurable objective unless referencing the quantification	D Williams will state more clearly that the 2003 water level is the mesurable objective	Comment incorporated into Chapter 8	5-2-19 Planning Committee Minutes_Chapter 8
5	8-4	180/400					5/2/19	Director McIntyre		In response to Director McIntyre, D Williams stated that he would prepare a table similar to the handout that Director Brennan distributed today summarizing all minimum thresholds and measureable objectives	Table included as Section 8.5	5-2-19 Planning Committee Minutes_Chapter 8
6	8-5	180/400					5/2/19	Director Secondo	Noted the error messages where the link was broken in the document. Would like the measurable objectives and historical data to be clear throughout the document and would like to express the threshold as a number instead of a percentage due to the small sampling	D Williams stated that we do not have the historical data for the deep aquifer and only have access to one well. D Williams will clarify the minimum thresholds in the deep aquifer and that we have the optoin to change the undesireable result as a number of exceedances instead of a percentage, but that is a policy decison	Question answered	5-2-19 Planning Committee Minutes_Chapter 8
7	8-6	180/400					5/2/19	Director McIntyre	Would like to choose a more recent year such as 2016 rather than 1991 for the Forebay for measurable objectives		Comment not incorporated at this time, as it does not pertain to the 180/400-Foot Aquifer Subbasin GSP	5-2-19 Planning Committee Minutes_Chapter 8
8	8-7	180/400			16		5/2/19	Director Brennan	Noted that the last sentence on page 16 is incomplete. The overhead on the 180/400 foot aquifer includes the Forebay and Upper Valley data, which was confusing	D Williams stated there was an ISP chaper on this. He would like to leave it in context	No change to Chapter 8	5-2-19 Planning Committee Minutes_Chapter 8
9	8-8	180/400					5/2/19	Director Secondo	Stated that all four graphs for th esubbasins should be in the ISP section and only the 180/400 should be in the 180/400 section	Comment noted	Chapter 8 for the 180/400-Foot Aquifer Subbasin only includes the appropriate graphs	
10	8-9	180/400					5/2/19			D Williams stated that we may want to differentiate between how to address and manage the sustainable criteria in the projects and actions part. Then we may want to revisit this criteria to decide if we are managing differently than this model's assumptions, in which case this may be the wrong number to report. We should revisit these numbers when we are managing, because the numbers are based on how much pumping has to occur to meet crop demand	No change to Chapter 8	5-2-19 Planning Committee Minutes_Chapter 8
11	8-10	180/400			17		5/2/19	Director Brennan	Stated that page 17 references natural recharge versus unnatural recharge, and it would be helpful to have an example		Comment incorporated into Chapter 8	5-2-19 Planning Committee Minutes_Chapter 8
12	8-11	180/400					5/2/19	Director Brennan and Director McIntyre	They would like more robust metering and reporting		Policy Decision included in list of policy issues that the Board must take up.	5-2-19 Planning Committee Minutes_Chapter 8
13	8-12	180/400					5/2/19	Nancy Isakson		D Williams, in response to N Isakson, will add that there is a data gap for domestic reporting for rural residential pumping, e.g. north county that is experiencing water quality issues	Sentence added to section 8.9.2 that identifies this as a possible data gap, but does not comit the SVBGSA to collecting additional groundwater quality data.	5-2-19 Planning Committee Minutes_Chapter 8
14	8-13	180/400					5/2/19	Director Secondo	Recommended considering abandoned wells as a groundwater extraction barrier	Comment noted	No change to Chapter 8	5-2-19 Planning Committee Minutes_Chapter 8
15	8-14	180/400					5/2/19	Tom Virsik	Stated there is not remotely enough information to make policy decisions. A consensus that we are looking at maintaining rather than improving the current situation, and the speaker would like the policy to state that instead of requiring a project	Comment noted - policy considerations for Board	No change to Chapter 8	5-2-19 Planning Committee Minutes_Chapter 8
16	8-15	180/400					5/6/19	Director Secondo	Referred to the statement "no new groundwater quality exceedances" so we should keep it to existing wells	D Williams stated that he would change this to "based on new new exceedances in existing monitoring wells"	Comment incorporated into Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8

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17	8-16	180/400					5/6/19	Director Brennan	Referred to the statement in the Groundwater Quality Undesirable Result slide, "on average during one year, no groundwater quality minimum threshold shall be exceeded." She asked how zero can be averaged	D Williams stated he will rewrite this as he meant the average of mulitple water quality samples	Comment incorporated into Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8
18	8-17	180/400					5/6/19	Nancy Isakson		D Williams, in response to N Isakson, stated he would include the Groundwater Quality Parameters table in Chapter 8	Table incorporated into Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8
19	8-18	180/400	8.8.2.3				5/6/19	Nancy Isakson	Wondered where the data for Section 8.8.2.3 came from, given that 8.8.2 states that the dataset does not distinguish between agricultural and domestic and cannot be used for purposes of developing minimum thresholds and measurable objectives	D Williams will check to determine whether his staff made this distinction from the material that they downloaded and whether the statement in 8.8.2 should be deleted	Text revised	5-6-19 PC Special Meeting Minutes_Chapter 8
20	8-19	180/400					5/6/19	Director Brennan	Confirmed that the earlier direction was related to existing monitoring system versus new wells.	D Williams stated that he understands that the discussion was regarding existing wells that we have included	No change to Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8
21	8-20	180/400					5/6/19	Les Girard	Noted that the requirements of the National Marine Fisheries biological opinion have been withdrawn, but the Water Resources Agency is operating under it as a safe harbor	D Williams will coordinate with Mr. Girard on the accurate phrasing	Text revised	5-6-19 PC Special Meeting Minutes_Chapter 8
22	8-21	180/400					5/6/19	Director Granillo	Director Granillo notes we will see water quality changes with release of summer flows		Comment noted	5-6-19 PC Special Meeting Minutes_Chapter 8
23	8-22	180/400					5/6/19	Director Brennan		D Williams, in resopnse to Director Brennan, stated he will add language that the GSA does not have any authority over the releases from the reservoir	Comment incorporated into Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8
24	8-23	180/400					5/6/19	Director Brennan	Would like the policy questions identified	LP: a summary table of policy questions was developed and sent to Gary Petersen on 5/24/2019	No change to Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8
25	8-24	180/400					5/6/19	Director Secondo	Asked whether we should be monitoring water quality if we do not control the river flow	D Williams stated there is no problem in looking at the information, but he defers to the Directors	Question answered	5-6-19 PC Special Meeting Minutes_Chapter 8
26	8-25	180/400					5/6/19	Director Secondo	Expressed concern about locking the GSA into monitoring when it does not have the authority	Commnet noted	No change to Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8
27	8-26	180/400					5/6/19	Director Granillo	Stated that the language should say there are water quality changes that we cannot impact		Sentence added to section 8.9.4.1	5-6-19 PC Special Meeting Minutes_Chapter 8
28	8-27	180/400			50		5/6/19	Nancy Isakson	Referred to page 50 regarding land owners' property rights next to the river. She would like Mr. Williams to revisit this section because neither the State nor courts have made a determination as to underflow, and the section ignores the overlying groundwater rights		We believe the correct citation is page 53. The text makes no assessment regarding underflow or overlying groundwater rights.	5-6-19 PC Special Meeting Minutes_Chapter 8
29	8-28	180/400		8.8			5/6/19	Nancy Isakson	Questioned whether the amount of acre feet diverted from the Salinas River is that large, e.g. 185,000 acre feet in 2010. Stated that the Salinas Valley Water Coalition's litigation is ongoing and water law should be referenced in this section instead of the opinion that was included. A table of policy issues would help both the Advisory Committee and the Board to identify the policy issues and options	D Williams stated the data is self reported to the State (in response to N Isakson's question regarding Table 8.8)	Table was corrected in Chapter 8 to reflect revised calculations.	5-6-19 PC Special Meeting Minutes_Chapter 8
30	8-29	180/400					5/6/19	Tom Virsik	Stated that skewed diversion numbers may skew the 7% of pumping reduction. The Upper Valley suggests that ignoring surface water distrinctions is not what the DWR is looking for	D Williams responsed that the GSP will not solve all problems and is reiterative. But it should reflect the Agency's priorities	No change to Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8
31	8-30	180/400					5/6/19	Nancy Isakson	Stated concern regarding the need for reconciliation	D Williams will note that there may be a data gap in the State Board's diversion reporting that should be addressed in the future	Comment incorporated into Chapter 8	5-6-19 PC Special Meeting Minutes_Chapter 8
32	8-31	180/400					5/1/19	Tom Virsik	The draft Chapters prominently cross-reference to a non- existent Chapter 6 (water budgets). Until Chapter 6 is/are reviewed, it is unfair to opine on draft Chapters 8. For example, one learrns of the "Basin" sustainable yield but not that of the individual Subbasins (other than the 180/400 in its own GSP). That basic information will inform the public on whether the GW levels are set correctly, among other metrics impossible to consider without Chapter 6		Chapter 6 draft has now released - Chapter 8 will be reviewed again after all Chapters have been released for comment	PlanningCommitteeComments_05012019_TomVirsik.

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33	8-32	180/400			17/33		5/1/19	Tom Virsik	In varying degrees, the drafts lack consistency in the use of certain terms, specifically: basin, Basin and subbasin ("sub-basin" is used once). Broadly, it appears that "Basin" is meant to refer to the entire Valley as referenced in (the not yet updated post boundary changes) Bulletin 118. Yet, "Basin" is at times used to refer to what in other parts of the draft Chapters is termed a "subbasin." Cf. e.g. 17/33 (112 K AFY yield for the "Basin" -- the 180/400 with 17/193 (494 K AFY yield for the "Basin" -- an array of subbasins).		We will review the consitency in terminology prior to finalizing all GSP Chapters	PlanningCommitteeComments_050 12019_TomVirsik Note: **xx/yy** in Page (xx represents page of the Chapter and yy is the page of the paginated packet)
34	8-33	180/400			10/26, 10/186		5/1/19	Tom Virsik	The draft content uses a term without (explicity) defining it. At several points, the content references "pumping allowances." See e.g. 10/26 and 10/186. The term needs a definition or reference as it is not a SGMA term of art		The phrase pumping allowance has been removed.	PlanningCommitteeComments_050 12019_TomVirsik
35	8-34	180/400			50/66, 50/226		5/1/19	Tom Virsik	A so-called "Report of Referee" is quoted for a point of law. 50/66 and 50/226. That Report comes from a lawsuit being actively litigated, which cannot be precedential in any legal sense. Salinas Valley Water Coalition v. MCWRA et al, 17CV000157 (Monterey County Superior Court). That litigation does not involve the GSA, so its interests and views were absent from the process that led to the Report. Nor is a lawsuit a public or transparent process (in a SGMA sense) where others may influence, correct, or steer the Report based on the best available data. Moreover, that "Report" contains many other findings and views, some of which contradict directly or indirectly other parts of draft Chapters 8. The Report--whether its content is good or bad by whatever metric--should not be relied upon.		Although the Report of Referee I not precidential, it provides guidance for our GSP and is therefore included in the GSP. This GSP is a policy document, not a legal finding.	PlanningCommitteeComments_050 12019_TomVirsik
36	8-35	180/400			57,73, 57,233		5/1/19	Tom Virsik	Surface (water) depletion thresholds are quantified in the draft content. But the relationship of the surface depletion to the sustainable yield is far from clear. Is the amount of depletion part of, in addition to, or bears no relationship to the sustainable yield figure for the Basin (or Subbasin)? See 57/73 and 57/233.		There is not effort to relate surface water depletion to sustainable yield in this chapter. This chpater only addresses sustainable management critera.	PlanningCommitteeComments_050 12019_TomVirsik
37									The sections addressing the surface and groundwater interactions are insufficiently clear or documented. It appears the model is not yet ready for surface water interactions. See 57/73 ("once the calibrated historial SVIHM is made available") and 51/227. The content includes tables and graphics quantifying surface water diversions. See 51/67 et seq and 51/227 et seq. Were surface water diversions from the eWRIMS database			
38	8-36	180/400			57,73, 51,227, 51/67		5/1/19	Tom Virsik	taken into account? Are they double-counted with the "groundwater" diversions reported (per Ordinance) to the MCWRA?		Surface water diversions were accounted for in the Water Budget portion of the GSP	PlanningCommitteeComments_050 12019_TomVirsik
39	8-37	180/400			58/74, 58/234		5/1/19	Tom Virsik	Oddly, the two Chapters 8's deviate noticeably at 8.10.4.2 Cf 58/74 with 58/234. In the 180/400 GSP, one of the bullet points states that riparian water rights holders are not regulated. In the ISP version of this section, the bullet point about riparian rights is replaced by one about de minimis pumping. Why the difference? Moreover, there is no lack of riparian pumpers with wells next to the river south of the 180/400, so why is that discussion absent in the ISP? Perhaps both riparian pumpers and de minimis pumpers belong at least in the ISP.		Versions will be reconciled.	PlanningCommitteeComments_050 12019_TomVirsik

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40	8-38	ISP			19/195		5/1/19	Tom Virsik	The ISP content lacks information about the newly added Paso Robles formation lands. No blame or fault is asserted - only that with a lack of data and experience about the substantial "new" lands, the GSP should be explicitly note the "data gap" at this time. Whatever occurs with an Upper Valley GSP, the facts and circumstances may require that the Paso Robles lands be managed differently given the lack of data, i.e. a SGMA management area with its own sustainable yield, etc. The draft Chapter for the ISP should note that option for the Paso Robles lands instead of painting with a broad brush that implies the Paso Robles cannot be developed. See 19/195 (the Paso Robles lands are primarily not currently irrigated).		This comment will be addressed in the Upper Valley GSP.	PlanningCommitteeComments_050 12019_TomVirsik
41	8-39	180/400					5/1/19	Tom Virsik	Conclusion: A great deal of work was put into the current (and all prior) Chapters, but the lack of Chapters 6, a far too hasty treatment of the newly added Paso Robles lands, a lack of clarity on the sources and relationship of the surface diversion numbers to the "groundwater" ones, and possibly incorrect separation of bullet points between the GSP and ISP -- among other noted instances of confusion or inquiry -- militate towards additional revisions before the drafts are further reviewed.	Comment noted	No change to Chapter 8	PlanningCommitteeComments_050 12019_TomVirsik
42	8-40	180/400	8.5.2.3		7		5/16/19	Bob Jaques	1st paragraph - change word *"to"* to from... *"monitoring site is similar to or different from water level thresholds in nearby representative……"*		Comment incorporated into Chapter 8	5-16-19 AC Meeting Packet with Comments from Bob Jaques
43	8-41	180/400	8.5.4.1		15		5/16/19	Bob Jaques	2nd pararaph, text reads *"Over the course of any one year, no more than 15% of the groundwater elevation minimum thresholds shall be exceeded in any single aquifer."* Comment: The same wells should not have their Minimum Thresholds exceeded more than "X" times in any "Y" year period		Text revised	5-16-19 AC Meeting Packet with Comments from Bob Jaques
44	8-42	180/400	8.5.4.2		16		5/16/19	Bob Jaques	2nd bullet point under Expansion of de-minimis pumping, text reads, *"Individual de-minimis pumpers do not have a significant impact on groundwater elevations. However, many de-minimis pumpers are often clustered in specific residential areas. Pumping by these de-minimis users is not regulated under this GSP. Adding additional domestic de-minimis pumpers in these areas may result in excessive localized drawdowns and undersirable results."* Comment: This problem should be addressed as it could have a potential impact on the basin.		Comment noted	5-16-19 AC Meeting Packet with Comments from Bob Jaques
45	8-43	180/400	8.5.4.3		16		5/16/19	Bob Jaques	1st paragraph of Effects on Beneficial Users and Land Uses: The same wells should not have their Minimum Thresholds exceeded more than "X" times in any "Y" year period.		Text revised	5-16-19 AC Meeting Packet with Comments from Bob Jaques
46	8-44	180/400	8.6.2		17		5/16/19	Bob Jaques	2nd paragraph, text reads, *"As noted in the regulatory definition of minimum thresholds quoted above, the reduction on groundwater storage minimum threshold is established for the basin as a whole, not for individual aquifers. Therefore, one minimum threshold is established for the entire Basin."* Comment: It doesn't seem very protective of the individual aquifers if the reduction in storage is applied to the basin as a whole without regard to the reduction in storage from each aquifer.		Comment noted. The text has been left as is.	5-16-19 AC Meeting Packet with Comments from Bob Jaques
47	8-45	180/400	8.6.2.6		20		5/16/19	Bob Jaques	3rd bulletpoint: correct spelling from AF to AFY: The current water use factor is assumed to be 0.39 AFY/dwelling unit.		Comment incorporated into Chapter 8	5-16-19 AC Meeting Packet with Comments from Bob Jaques

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48	8-46	180/400	8.6.4.2		22		5/16/19	Bob Jaques	2nd bulletpoint under Expansion of de-minimis pumping, text reads, *"Pumping by de-minimis users is not regulated under this GSP. Adding domestic de-minimis pumpers in the Basin may result in excessive pumping and exceedance of the long-term sustainable yield, an undersirable result."* : Comment: This problem should be addressed as it could have a potential impact on the basin.		Comment Noted	5-16-19 AC Meeting Packet with Comments from Bob Jaques
49	8-47	180/400	8.7.2.1		23		5/16/19	Bob Jaques	Comment on 2nd paragraph of the following *"These maps are devloped through analysis and contouring of the values measured at dedicated monitoring wells near the coast, as shown on Figure 8-6 and Figure 8-7."* - Comment: These contours will likely change shape over time, sometimes receding and sometimes advancing further inland. This will complicate determing if this Minimum Threshold has been exceeded.	Comment noted	No change to Chapter 8	5-16-19 AC Meeting Packet with Comments from Bob Jaques
50	8-48	180/400	8.7.2.2		27		5/16/19	Bob Jaques	1st paragraph text reads, "The minimum threshold for seawater intrusion is a single value for the entire Subbasin. Therefore, no conflice exists between minimum thresholds measured at various locations within the Subbasin." Comment: There should be a separate Minimum Threshold for each aquifer.		Text revised	5-16-19 AC Meeting Packet with Comments from Bob Jaques
51	8-49	180/400	8.8.2		31		5/16/19	Bob Jaques	See Item 2. *"They must have previously been found in the Subbasin at levels above the level of concern"* : Why should this be one of the two criteria?		This criterion shows that the constituenets are effectively a potential problem in the basin	5-16-19 AC Meeting Packet with Comments from Bob Jaques
52	8-50	180/400	8.8.2		32		5/16/19	Bob Jaques	Comment on Coliform bacteria COC list elimination: My understanding is that coliform is commonly monitored in water supply wells		These results are not commonly reported.	5-16-19 AC Meeting Packet with Comments from Bob Jaques
53	8-51	180/400	8.8.2		32		5/16/19	Bob Jaques	Comment on Strontium COC list elimination: Since this is listed as a constituent of concern, it seems like it should start being sampled for.		The GSA is not sampling for water quality independently; we are using data from other specific WQ programs; if they don't monitor certain parameters, we will not report them either	5-16-19 AC Meeting Packet with Comments from Bob Jaques
54	8-52	180/400	8.8.2.7		41		5/16/19	Bob Jaques	3rd paragraph under Domestic land uses and users, text reads, *"The degradation of groundwater quality minimum thresholds generally provides positive benefits to the Basin's domestic water users."* Comment: If existing exceedances are basically ignored and allowed to continue, this doesn't provide "positive benefits" to them.		Existing exceedances are not due to GSA actions or GSP implementation, therefore they do not fall under GSA's jurisdication. Other programs are in charge of water quality issues.	5-16-19 AC Meeting Packet with Comments from Bob Jaques
55	8-53	180/400	8.9.1		44		5/16/19	Bob Jaques	1st bulletpoint, text reads, *"Any land subsidence caused by lowering of groundwater levels occurring in the basin is significant and unreasonable."* Comment: Subsidence will not always cause a problem for example, if there is no infrastructure in an area where subsidence occurs, it will not cause any damage.		Comment noted. However, it will be difficult to *a-priori* identify areas where subsidence is acceptable and where it is not.	5-16-19 AC Meeting Packet with Comments from Bob Jaques
56	8-54	180/400	8.9.2.2		46		5/16/19	Bob Jaques	The wording of the following sentence doesn't make sense (see 1st bulletpoint under Chronic lowering), *"…therefore the subsidence minimium thresholds will not compel in a significant or unreasonable lowering of groundwater levels."*		Text revised	5-16-19 AC Meeting Packet with Comments from Bob Jaques
57	8-55	180/400					5/16/19	Steve McIntyre	Perhaps you could word the bullet point concerning the impacts of surface diversions/groundwater pumping on the environment to read: "ground water pumping is assumed not to be unreasonable for environmental flows but this assumption is subject to the process of establishing an HCP" (or something to this affect)		Comment incorporated into Chapter 8	
58	8-56	180/400					5/16/19	Dallas Tubbs	The text describes how the basin will be managed as a whole to prevent undesirable results. Given the criteria set forth in Chapter 8, it seems likely there will be an undesirable result in the 180/400-Foot aquifer. Accordingly, does this mean that there will be basin-wide groundwater pumping limits, and if so, how will those be apportioned?		Each subbasin will have a unique sustainable yield that will drive the pumping limit in the subbasin	5-19-19_180-400_Ch8_Chevon_DallasTubbs

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59	8-57	180/400	8.5.2.2		7		5/16/19	Dallas Tubbs	The text states: "*Minimum thresholds for groundwatwer elevations are compared to the range of domestic well depths in the Subbasin. Conclusions from the comparison identifies modest impact to domestic wells in both the 180- and 400-foot aquifers.*" Question: Should there be a similar evaluation of the other well categories in the Subbasin to make the minimum thresholds impacts and trade-offs visible?		Only domestic wells were considered because they are commonly the most shallow wells in an area.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
60	8-58	180/400	8.5.2.3	8-1	6,7		5/16/19	Dallas Tubbs	See 1st bulletpoint Change in Groundwater Storage: The text states. *"The groundwater elevation minimum thresholds are set at or above existing groundwater elevations* ." We recommend that a "date" column be added to Table 8-1 on page 6, listing the baseline date for each well and measurement.		Because this table (Now Table 8-2) does not include any monitoring data, the date column is not included.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
61	8-59	180/400	8.5.2.3		7		5/16/19	Dallas Tubbs	Shouldn't the groundwater elevation minimum threshold be set when the GSP is adopted? Given the time gap between when these elevations were taken, groundwater elevations could be in an undesirable state before the GSP is submitted		We must include minimum thresholds in the GSP. The basin will not be out of compliance when we adopt the plan. The basin is only out of compliance if we exceed minimum thresholds 20 years after adoption.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
62	8-60	180/400	8.5.2.3		8		5/16/19	Dallas Tubbs	See 2nd bulletpoint Seawater Intrusion: In addition to text here, it would be helpful to incorporate the MCWRA maps here showing the current areal extent of seawater intrusin (or at least when citing the reference to other locations in the GSP). Please include a discussion of the groundwater gradient because this is the driving force for seawater intrusion		A discussion of seawater intrusion is included in Chapter 5.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
63	8-61	180/400	8.5.2.3		8		5/16/19	Dallas Tubbs	Question: If groundwater elevations are maintained at the minimum threshold (i.e. "at or above the existing groundwater elevations") does that mean there will be no further expansion of the areal extent of seawater intrusion?		No. Seawater intrusion will continue if groundwater elevations are simply maintained at current levels.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
64	8-62	180/400	8.5.4.1		15		5/16/19	Dallas Tubbs	Undesirable Results: One of the metrics to determine whether the basin is compliant is based on water level measurements. The proposed metric is 15% of wells below the groundwater elevation minimum threshold (or a cluster or wells) yields an undesirable result. One well in this - is already below the threshold, so three additional wells below the threshold would be considered an undesirable result (or less if the wells are in a cluster.) Also, with respect to seawater intrusin, it would seem that the location of the wells plays an important role. As worded, the requirement seems overly restrictive. Without supporting arguments, Chevon proposes the number of well be increased		Comment noted	5-19-19_180-400_Ch8_Chevon_DallasTubbs
65	8-63	180/400	8.5.4.1		15		5/16/19	Dallas Tubbs	Questions: (1) Have the 23 existing monitoring wells been deemed to be a statistically meaningful quantity? If not, what is the recommended number of monitoring wells needed in the basin to provide statistically meaningful data?; (2) Given the seemingly small sample size (23 wells), we question if 15% is likely to be too sensitive to be representative of the overall basin; (3) As a hypothetical question, if four wells with an undesirable result are all located at the northern end of the Subbasin, would that require the GSA to take action across the entire Basin, or just the effected Subbasin?		1) no assessment of statistical signficance has been developed. 2) Comment noted. 3) if four wells exceed minimum thresholds anywhere in the subbaisn, it will require the GSA to take action	5-19-19_180-400_Ch8_Chevon_DallasTubbs
66	8-64	180/400	8.6.2.6		20		5/16/19	Dallas Tubbs	Under Method for Quantitative Measurement of Minimum Threshold, third bulletpoint: Text states, *"The current water use factor is assumed to be 0.39 AF/dwelling unit."* Please cite the reference that supports the water use factor of 0.39 AF per dwelling unit.		Reference added	5-19-19_180-400_Ch8_Chevon_DallasTubbs

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67	8-65	180/400	8.6.3.1		21		5/16/19	Dallas Tubbs	Paragraph under Method for Setting Measurable Objectives: This section is unclear (i.e., it reads like the "chicken and egg" conundrum). Please discuss the relationship between storage and pumping.		Although the SMC is called reduction in groundwater storage, the regulations require that the metric be total pumping. The GSP simply follows the regulations.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
68	8-66	180/400	8.8.1		30		5/16/19	Dallas Tubbs	Degraded Water Quality SMC, Under 1st bulletpoint: The terms "SMCL" and "MCL" need to be defined in the document.		Comment incorporated into Chapter 8	5-19-19_180-400_Ch8_Chevon_DallasTubbs
69	8-67	180/400	8.8.2	8-2	35		5/16/19	Dallas Tubbs	This section describes metrics around water quality. The metrics seem excessively restrictive. For example, *"Zero additional municipal production wells that are in the GSP monitoring program shall exceed the sulface SMCL of 250 mg/L."* The secondarly MCL for sulface (which has to do with taste/odor and not toxicity) should not be metric. Many of the constituents listed in this section are naturally occurring, and some may be just below the MCL or SMCL. If these concentrations increase for a reason besides groundwater withdrawal (including natural variability) it does not make sense to include these. Chevron has concern that the metric requiring "zero additioinal wells" is setting the basin up for failure. Analyticial variability, or bad sampling methods could yield an undesirable result. Interpreting analytical data is much more difficult than water level meaurement data.		This issue is addressed in the Degradation of Groundwater Quality undesirable result section. The undesirable result is based only on exceedences directly caused by the GSA's actions or projects	5-19-19_180-400_Ch8_Chevon_DallasTubbs
70	8-68	180/400	8.8.2		31		5/16/19	Dallas Tubbs	The text reads, *"Constituents of concern must meet two criteria: 1. They must have an established level of concern as an MCL or SMCL, or a level that reduces crop production, 2. They must have previously been found in the Subbasin at levels above the level of concern."* Why is the word "previously" inserted in the second bullet point?		The word previously has been deleted.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
71	8-69	180/400	8.8.2		32		5/16/19	Dallas Tubbs	The text reads, *"These constituents are monitored with the ILRP wells and are known to cause reductions in crop production when irrigation water includes them in high concentrations."* The term "high concentrations" is ambiguous. Should a specific value be stated for each constituent?		Comment incorporated and question answered	5-19-19_180-400_Ch8_Chevon_DallasTubbs
72	8-70	180/400	8.8.2		32		5/16/19	Dallas Tubbs	The text reads *"As noted in Section 5.6.3, based on available information there are no mapped groundwater contamination plumes in the Subbasin."* What is the documentation to support this statement? Also, is seawater intrusion not defined as a plume?		Seawater intrusion is a separete sustainability indicator	5-19-19_180-400_Ch8_Chevon_DallasTubbs
73	8-71	180/400	8.8.2.1		36		5/16/19	Dallas Tubbs	As previously mentioned, the zero exceedances expectation is setting up the GSP for failure. Analytical variability, or bad sampling methods could yield an undesirable result. Interpreting analytical data is much more difficult than monitoring water level measurement data. We recommend using historical data to develop a reasonable tolerance band for each parameter.		This issue is addressed in the Degradation of Groundwater Quality undesirable result section. The undesirable result is based only on exceedences directly caused by the GSA's actions or projects	5-19-19_180-400_Ch8_Chevon_DallasTubbs
74	8-72	180/400	8.8.2.1	8-3	37		5/16/19	Dallas Tubbs	We note that several of the constituents of concern listed appear to show incorrect MCLs (e.g. chloride, Radon-222, Sulface and TDS). What standard is being used for this information?		Calivornia drinking water standards are used, as specified in Table 8-4	5-19-19_180-400_Ch8_Chevon_DallasTubbs
75	8-73	180/400	8.8.4.1		43		5/16/19	Dallas Tubbs	Under *Criteria for Defining Undesirable Results:* To clarify, does this section mean that future projects or management actions SVBGSA might undertake will be executed in such a way that an undesirable result does not occur?		This section does mean that any project or management action undertken by the SBBGSA will not diretly lead to an undesirable result	5-19-19_180-400_Ch8_Chevon_DallasTubbs

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76	8-74	180/400	8.8.4.2		43		5/16/19	Dallas Tubbs	2nd bulletpoint Groundwater Recharge, text reads, *"Active recharge of imported water or captured runoff could modify groundwater gradients and move one of the constituents of concern towards a supply well in concentrations that exceed relevant limits."* Does this statement mean that ground water recharge can't contain anything that has an MCL above the threshold?		That is correct	5-19-19_180-400_Ch8_Chevon_DallasTubbs
77	8-75	180/400	8.9.2.3		47		5/16/19	Dallas Tubbs	3rd paragraph states, *"Therefore, the minimum thresholds in the 180/400-Foot Aquifer Subbasin is zero subsidence."* Setting an absolute value for subsidence is unwise. The minimum threshold should be stated in terms of a subsidence metric measured over time. For example, is 1 cm of change over 40 years unacceptable? We advise waiting until historial InSAR data has been obtained and evaluated prior to setting the minimum threshold. Because ground elevations can change over time unrelated to water extraction, some subsidence may be reasonable depending on the rate of change		Historical InSAR data have now been obtained and are being incorported. We will continue to use the zero subsidence metric, but will incorporate measurement error into our definition of zero subsidence.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
78	8-76	180/400	8.10.2		51		5/16/19	Dallas Tubbs	2nd paragraph, text reads, *"However, without good historical data or a numerical model, it is difficult to assess whether and where the stream is connected to underlying groundwater."* Perhaps it would be best to postpone setting a minimum threshold for depletion of interconnected surface water until more data can be captured or a numerical mode is made available.		We must include minimum thresholds in the GSP. This thrshold can be modified as additional data are collected.	5-19-19_180-400_Ch8_Chevon_DallasTubbs
79	8-77	180/400					5/16/19	Gary Petersen	Stated that the Integrated Sustainability Plan is being tabled temporarily.	D Williams stated that the slides still include some of the sustainability indicators for all the Valley	Question answered	2019-05-16 AC Minutes
80	8-78	180/400					5/16/19	Robin Lee	Why aren't the groundwater elevation measurable objectives set to stop seawater intrusion?	D Williams stated the measurable objective is not the same as the groundwater elevation, because intrusion could be stopped by pumping water out as well as by raising water levels.	Question answered	2019-05-16 AC Minutes
81	8-79	180/400					5/16/19	Abby Taylor Silva	How many wells have exceeded the minimum threshold in 2015?	D Williams stated that he would have to report back on how many wells would have exceeded the minimum threshold in 2015	Still to be done	2019-05-16 AC Minutes
82	8-80	180/400					5/16/19	Norm Groot	What is the definition of the not to exceed 15% for Undesirable Results?	D Williams stated that the not to exceed 15% he proposes for Undesirable Result can be revisited at least every five years and even before the completion of this process to determine whether we can attain the objectives with the financing we have. A public process would be required	Question answered	2019-05-16 AC Minutes
83	8-81	180/400					5/16/19	Robert Burton	What is the criteria for the representative period selection.	D Williams stated that the representative period was selected to include reservoir operations and wet and dry period, but it could be expanded or contracted. D Williams does not believe the 1992 minimum threshold was an outlier year in Figure 8-1 as there were 3 years that reached this level	Question answered	2019-05-16 AC Minutes
84	8-82	180/400					5/16/19	Bob Jaques	Might be a good idea to not show the same wells that are below the minimum threshold each year	D Williams will note not to add the same wells below the minimum threshold every year so to avoid always penalizing the same people	Text revised	2019-05-16 AC Minutes
85	8-83	180/400					5/16/19	Dallas Tubbs	Is the 15% measurement for undesirable results too low as a representation of the entire basin?	D Williams will note that the 15% measure for undesirable results may be too low if the monitoring wells are not representative of the entire basin	Comment noted	2019-05-16 AC Minutes
86	8-84	180/400					5/16/19	Harold Wolgamott	Should add footage when addressing the 15% Undesirable Results	D Williams will consider Harold's comment "by X feet" to the 15% referenced in Undesirable Results, e.g. 2 feet or 5 feet	No change to text. It would be wiser to simply change the minimum thresholds	2019-05-16 AC Minutes
87	8-85	180/400					5/16/19	Tom Virsik	References his previous written comments. The concentration of exceedances seems to scream a need for a management area	Comment noted	No change to Chapter 8	2019-05-16 AC Minutes
88	8-86	180/400					5/16/19	Heather Lukacs	Stated there should be different management areas for drinking water protections, e.g. it is not acceptable for 15% to be the undesirable result measure.	D Williams stated we will note the question whether we should have management areas near public water supply wells to avoid exceedances around those wells	Comment Noted	2019-05-16 AC Minutes

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89	8-87	180/400					5/16/19	?	?	Mr. Williams stated that significant policy question include whether we should expand the existing groundwater pumping reporting requirements and define pumping allowance.	Question answered	2019-05-16 AC Minutes
90	8-88	180/400	8.6.2.6				5/16/19	Abby Taylor Silva	Can we charge de minimis users and require metering? Regarding 8.6.2.6, "Method for Quantitative Measurement of Minimum Threshold" asked about a process for collecting data that is not currently reported.	D Williams stated that we can charge de minimis users but cannot require metering. In response to Taylor Silva's question about collecting data defined under 8.6.2.6, D Williams stated that this is a policy decision in the implementation plan and the reporting system can be expanded, perhaps through the WRA	Question answered	2019-05-16 AC Minutes
91	8-89	180/400					5/16/19	Bob Jaques	Stated the regulations' requirement to report for the basin as a whole is not a good idea and wondered if the GSA could have minimum objectives and thresholds for each aquifer	D Williams stated that setting specific pumping amounts for each aquifer would require more calculations; not doing so could result in other sustainability criteria being violated	Question answered	2019-05-16 AC Minutes
92	8-90	180/400	8.6.2.2				5/16/19	Robin Lee	Asked about Section 8.6.2.2, Depletion of Interconnected Surface Waters, and what if we do not like whiat is going on today.	D Williams asked her to hold the question		2019-05-16 AC Minutes
93	8-91	180/400					5/16/19	Tom Ward/Howard Franklin	In response to Tom Ward, Howard Franklin stated there are 47 or 48 deep aquifer wells, and they are collecting on most of those wells. They are not all in the pressure area		Question answered	2019-05-16 AC Minutes
94	8-92	180/400					5/16/19	Bob Jaques	Stated that the isocontour line could change, and it may be better to say the total area is the measure.	D Williams stated that the regulations say it is line we cannot cross. The map indicates there are not huge fluctuations annually. If we implement certain projects, it could affect the isocontour. We can expand the isocontour to allow some flexibility. But when implementing projects, it may harm other indicators.	Question answered	2019-05-16 AC Minutes
95	8-93	180/400					5/16/19	Howard Franklin	Stated that the 2018 data does not show the isocontour line going backwards and a larger buffer over that should be allowed	Comment noted	No change to Chapter 8	2019-05-16 AC Minutes
96	8-94	180/400					5/16/19	Harold Wolgamott	Suggested moving the isocontour line further inland, halfway between where it is and Highway 1		Comment noted. This is a policy decision to be discussed with Board	2019-05-16 AC Minutes
97	8-95	180/400					5/16/19	Abby Taylor Silva	Asked if the undesirable result could be established year one of projects without knowing what the data would be.	D Williams responded that the DWR is looking for definitive, quantifiable items. Suggests 2017 as a buffer. When we get to the five-year date of the Plan, it could be changed at that point	Question answered	2019-05-16 AC Minutes
98	8-96	180/400					5/16/19	Heather Lukacs	The 2017 year could be reviewed for change five years from now	D Williams stated that it is worth defining the minimum threshold that is currently further inland than 2017, so he would like more feedback. It will depend on the financing to implement a project to stop seawater intrusion	Question answered	2019-05-16 AC Minutes
99	8-97	180/400					5/16/19	Nancy Isakson	She agreed with Heather Lukacs that the 2017 year should be retained to ensure that something is done	Comment noted	No change to Chapter 8	2019-05-16 AC Minutes
100	8-98	180/400					5/16/19	Dallas Tubbs	Would like to think about chain of command and protocols on how to test wells so it is equivalent and replicated well to well	D Williams stated that we are not collecting samples but gathering data from others' samplings	Question answered	2019-05-16 AC Minutes
101	8-99	180/400					5/16/19	Harold Wolgamott	Noted we should only use reliable data	D Williams stated that we would come up with a new list of wells and new minimum thresholds and objectives with every five-year update. They would not use a well redrilled in the same spot	Question answered	2019-05-16 AC Minutes
102	8-100	180/400					5/16/19	Nancy Isakson	Why are nitrates not included as constituents of concern in ag wells	D Williams stated that nitrates were not included because they are pushed into an ag well and do not negatively impact crop production, so the grower would not have to abandon the well	Question answered	2019-05-16 AC Minutes
103	8-101	180/400					5/16/19	Bob Jaques	Stated that we should be sampling for constituents of concern	D Williams responded that under SGMA, we are not sampling but are looking at whether we are causing any harm. The Regional Board is responsible for cleaning up the basin	Question answered	2019-05-16 AC Minutes

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104										D Williams stated they are setting additional nitrates exceedances at zero unless the DWR does not accept their proposal for undesirable results to be defined as "On average during any one year, no groundwater quality minimum threshold shall be exceeded as a direct result of		
105	8-102	180/400					5/16/19	Norm Groot	?	projects or management actions taken as part of GSP implementation."	Question answered	2019-05-16 AC Minutes
106	8-103	180/400					5/16/19	Horacio Amezquita	Asked when the GSA will address the problem of increasing nitrate concentration and well pollution.	D Williams responded that the GSA would not take this issue on if it is unrelated to SGMA. We are looking at projects that would have an impact on water quality	Question answered	2019-05-16 AC Minutes
107	8-104	180/400					5/16/19	Heather Lukacs	Asked how are we rationalizing missing data because wells are not sampled regularly	D Williams responded that the mandate is to increase water supply without harming water quality using existing data	Question answered	2019-05-16 AC Minutes
108	8-105	180/400					5/16/19	Dallas Tubbs	Commented that absolute subsidence is as important as the rate of change, so the threshold would work in over time	D Williams stated that on May 6, 2019, DWR announced they will provide InSAR data that will show monthly change in ground surface. Stated that the minimum threshold for subsidence would be a very low rate of subsidence and not zero subsidence	Insar data now included in GSP. Decision was to retain zero subsidence with acknowledgment of measurement error	2019-05-16 AC Minutes
109	8-106	180/400					5/16/19	Harold Wolgamott	Agreed with Mr Tubbs and would like a better definition of the minimum threshold definition of no subsidence that impacts infrastructure		Comment noted	2019-05-16 AC Minutes
110	8-107	180/400					5/16/19	Emily Gardner	Asked about the reference to infrastructure	D Williams stated the legislation is written in that way, and there is a decrease in storage in clay where there is no pumping	Question answered	2019-05-16 AC Minutes
111	8-108	180/400					5/16/19			D Williams stated the surface water depletion section includes many policy questions	Commment noted	2019-05-16 AC Minutes
112	8-109	180/400					5/16/19	Robin Lee	Asked whether we agree that the impact on our river flows is significant but not unreasonable	D Williams answered that whether we are having an impact on ecosystems that are groundwater dependent is a different policy question	Question answered	2019-05-16 AC Minutes
113	8-110	180/400					5/16/19	Howard Franklin	Stated that the WRA will be redefining how to provide environmental flows, so how do we say the MCWRA is successfully achieving environmental flows in the Salinas River	D Williams responded that the Plan is based on the best data currently available and will be revisited in three to five years	Question answered	2019-05-16 AC Minutes
114	8-111	180/400					5/16/19	Howard Franklin	Objects to the language that they are successfully achieving environmental flows	D Williams considered modifying the language to reflect that the WRA is operating under the NOAA previous biological opinion. It is difficult to say we will not meet those environmental flows if we do not know what they are, but this is a policy issue	Question answered	2019-05-16 AC Minutes
115	8-112	180/400					5/16/19	Nancy Isakson	Questions whether we can say that stream depletion is not unreasonable. In response to D Williams response, she said that is not what she is saying and will provide D Williams with some quoted language	D Williams stated that the statement is open for discussion. Since the structures operate in a way that implicitly understands depletion rates, we have already addressed reservoir depletion rates so it is not unreasonable. However, we could say release less water in Nacimiento and get the same amount of flow if we had less depletion	Question answered	2019-05-16 AC Minutes
116	8-113	180/400					5/16/19	Donna Myers	Stated that “successfully achieving” should be changed to “providing water flows”		Comment incorporated into Chapter 8	2019-05-16 AC Minutes
117	8-114	180/400					5/16/19	Charles McKee	Suggested “successfully provided environmental flows as long as requirements were in place.”		Comment incorporated into Chapter 8	2019-05-16 AC Minutes
118	8-115	180/400					5/16/19	Donna Myers	Asked if the lakes are considered in the statement "Limited recreational opportunities on the Salinas River, therefore groundwater pumping is not unreasonable for recreational flows," and whether this is an accurate statement	DW said lakes are not considered at this point because the pumping is not depleting lakes. However, lakes are a secondary consideration we could address	Question answered	2019-05-16 AC Minutes

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119	8-116	180/400					5/16/19	Robin Lee	Asked where the environmental community's concern about habitats is addressed. She is concerned about wells on smaller tributaries that may be depleting ecosystems	D Williams stated that we have mapped potentially dependent ecosystem but not known groundwater dependent ecosystems. This is a policy decision. He has not identified which we want to protect. Implementation could include a project to hire a biologist to visit sites identified by aerial photos to assess whether they are groundwater dependent or not. Then the group could make policy recommendations on importance and establishing policies, but it will take some time. He requested further feedback as to whether we are having an unreasonable impact and how we address groundwater dependent ecosystems or should we address, better understand, and protect them. D Williams invited Committee members to provide additional input as soon as possible for inclusion for the Board's consideration.	Question answered	2019-05-16 AC Minutes
120	8-117	180/400					5/16/19	Harold Wolgamott	Stated that the GSA does not include surface water, e.g., pumping in Chualar would not have environmental factors directly affected	D Williams stated that this raises the question of do we think pumping is significant and unreasonable. If you are pumping from the 400 foot aquifer, it would be hard to say cut back to improve stream flows.	Question answered	2019-05-16 AC Minutes
121	8-118	180/400					5/16/19	Robin Lee	Would like a written description of what Mr. Williams needs to develop good decisions on the ecology.	D Williams stated he is understanding that some people would like to see ecosystems and that we may have overstated the case about no significant and unreasonable impacts. But on the other hand, there is uncertainty whether we can say that it is unreasonable. He's looking for feedback. He can help guide the Committee, but policy ideas are tough because there is not much data that we can rely upon	Question answered	2019-05-16 AC Minutes
122	8-119	180/400					5/16/19	Robin Lee	Added that we could propose that we get the ecosystem data	D Williams stated we could map them or look at shallow groundwater levels that are within 15 feet to 20 feet, and then we can say we know it is a Groundwater Dependent Ecosystem. Then it becomes a policy decision whether to maintain it as a viable system and whether to implement projects and plans to protect them. D Williams summarized the comment as what is the policy as to whether we are having a significant and unreasonable impact.	Question answered	2019-05-16 AC Minutes
123	8-120	180/400					5/16/19	Heather Lukacs	Asked whether the Agency or a standard of law would determine "significant and unreasonable."	D Williams stated that the law says the Agency decides, but there will be disagreement regardless of what is decided	Question answered	2019-05-16 AC Minutes
124	8-121	180/400					5/16/19	Tom Virsik	Stated that the direction should be to make it simpler and less complex	D Williams summarized to focus the discussion on pumping impacts on the 180/400 foot aquifer and not on the entire river.	Question answered	2019-05-16 AC Minutes
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