

COMMENTS RECEIVED FROM JULY 7, 2020 to August 20, 2020 (page 1)

Number	Subbasin	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
1	Monterey					07/07 Meeting	Bob Jaques	Will you please say something about Seaside Subbasin?	Emily: Yes, the other 6 generally fall under the SVBGSA jurisdiction. Seaside does not because it is adjudicated.	
2	Monterey					07/07 Meeting	Bob Jaques	When do you anticipate releasing the initial set of draft chapters?	Emily: As soon as we're ready. We are reviewing and will release them as soon as humanly possible.	
3	Monterey					07/07 Meeting	Janet Brennan	Will those elements you mention be a part of each GSP? So we will be looking to do something similar as the 180/400?	Emily: Yes	
4	Monterey					07/07 Meeting	Sarah Hardgrave	With respect to the chapters and topics, given that we're coordinating with MCWD, will there be a single description of the plan area and the HCM? Or will there be two separate descriptions?	Emily: I will defer to Derrick Williams. We are still figuring out how to put this together. We will end up with one GSP, but how the chapters will look is yet to be determined. DW: As Emily points out, we will write one GSP, so the description will be for one basin. If we decide on management areas, there will be those descriptions. However, these additional descriptions need to add up to one basin. I went over the regulations this morning, and we're still working this out.	
5	Monterey					07/07 Meeting	Sarah Hardgrave	Patrick will you have separate stakeholder engagement outreach? Will we be invited?	Patrick Breen: We are planning on having separate stakeholder meetings for the Marina-Ord area, and we will send out notice soon. Patrick: It will be a separate group, but it will be a public meeting so everyone here is welcome to join. We are working it out this month. Donna: We are working under a framework agreement. We have our own process, but we are very much coordinating and working under the framework agreement.	
6	Monterey					07/07 Meeting	Sarah Hardgrave	Is that framework agreement posted?	We can send it to the subcommittee	
7	Monterey					07/07 Meeting	John Farrow	I was interested in hearing about the coordination with MCWD. I think the framework agreement should be posted for the public to view.	Comment Received	
8	Monterey					07/07 Meeting	Bob Jaques	I think it would be important to include the Seaside Model developed by HydroMetrics, in addition to the SVIHM and SVOM listed.	Comment Received	
9	Monterey					07/07 Meeting	Sarah Hardgrave	Are these workshops meant to be for all subbasins?	Emily: Yes they are. Bob, we have talked about your suggestion. We are planning for the Monterey Subbasin to have a specific Seaside meeting, possibly early in the process (Aug, Sept). Could we cover the model in that meeting? Bob: I think that's a good idea, and I'd like to make a presentation. I spoke with M&A, September is looking good and I think it would fit in well with GSP development. Sarah H: I think that's a good plan.	
10	Monterey					07/07 Meeting	Jon Farrow	First, want to make sure there's an opportunity for comment on the drafts; I assume you will proceed similar to 180/400 and post the chapters on the website. 2nd, I'm interested in how you'll coordinate with 180/400 subbasin. Coordination with projects and water charges framework. Not clear to me how that coordination will work out, especially with the integrated plan. Third, you mentioned there would be an opportunity for this committee to provide steering on the drafts before the drafts are written. The SMCs presentation describes options, but how to pick which option will be more suitable. I see the recommendations are not planned for September, but you won't in fact be seeking guidance or in the workshop later this month, on how to focus on one option or another. Those options need to be informed by data and information which is not available yet.	Emily: As the draft chapters are available, they will be included in the agenda packets and posted on the website. They will be very accessible. To the third question about when we will seek input, it's scheduled for September, but we can push it depending on if we're ready. Today is mainly informational. Donna: We will be tracking all the subbasin planning efforts against the 180/400. The 180/400 is kind of the foundational GSP, and was required by the state to be completed first due to its condition. The ISP committee will be looking at the technical aspects of each GSP to see how they will work. The SWIG had its first meeting this month, filled with technical experts and various agencies and groups. The SWIG is looking at developing agreement and how to define SWI and conditions. As we move through the planning process we will look at the integrative parts as well. This integrative planning will be more available at the Adv Committee and BOD meetings.	
11	Monterey					07/07 Meeting	Janet Brennan	It was recommended that we use a consensus process to make decisions for the GSP plans. This is a different process than what we used in the 180/400. Can you explain this?	Emily: This process of finding consensus is what Gary intended as well, since I used his slides. What we'll be asking for is strategic direction. The board will look at accepting the plan. We need strategic direction from you.	
12	Monterey					07/07 Meeting	Sarah Hardgrave	You did identify we would be making motions and taking votes. There is a goal to achieve consensus, but we will be making motions and taking votes also?	Emily: Exactly. If there is a wide variety of opinions, we'll document that too.	
13	Monterey					07/07 Meeting	Janet Brennan	Will each GSP go to the board for approval?	Emily: Our plan is for the comments we receive to be incorporated into the drafts and then go to the board.	
14	Monterey					07/07 Meeting	Sarah Hardgrave	With the MCWD agreement, will they have their own committee member for the ISP?	Donna: For the ISP Committee, we would have one representative from this subbasin committee. The goal is to have one representative from each subbasin. Emily: This is the next agenda item. Within the framework agreement, there are several subcommittees; our committee here, the MCWD committee, a technical committee, a steering committee which will include the GSA manager from each GSA and will provide another layer of alignment to create one GSP. We're looking for one person on this committee to volunteer to be on the ISP and one person for the steering committee	
15	Monterey					07/07 Meeting	John Farrow	I have a question about how the technical and steering committees relate to the ISP.	Emily: Technical committee is really to do the work, and make sure the GSP is done in a coordinated fashion with the nuts and bolts of the plan. The steering committee will (as defined in framework agreement) review draft chapters and elevate issues to advisory committee. Any issues to be worked out between the two GSAs will happen here. Donna: To clarify, the genesis of the technical and steering committees really come out of 2018 framework agreement. As each GSA does its work, we wanted to be clear and create as much coordination and communication as possible.	

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16	Monterey					07/07 Meeting	Gary Peterson	As we think about technical committee, M&A and EKI are meeting to work through technical issues, and the plan is aligned on a technical level. The framework agreement is now 3 years and one GSP old; may be revised. We didn't know what it all would look like when we started it. We can adjust as we go.		
17	Monterey					07/07 Meeting	Janet Brennan	I don't understand the hierarchy. Do technical and steering committees provide input? What decisions will these committees be making in relation to how our committee makes recommendations.	Donna: The BOD ultimately has approval over the plan. The technical committee works on technical information, will run through our committee. The technical committee work will come through some of the workshops, and we will discuss these items with you also. Steering committee is related to utilizing BOD member and general managers from each GSA and will keep BOD updated, utilized in slightly different way. ISP Planning committee, fairly clear.	
18	Monterey					07/07 Meeting	Janet Brennan	Good overview of recent history. Going back a little bit, seems the Monterey Subbasin used to be a part of the 180/400 subbasin where there is a 3,500 AFY SWI. Why is this subbasin not a part of the 180/400? Why is this subbasin not critically over drafted?	Gary: This is a DWR question. The subbasin determinations were set by DWR.	
19	Monterey					07/07 Meeting	Janet Brennan	As part of our subbasin planning, will we address the Deep Aquifer which is a part of this subbasin?	Gary: I would say SWIG will look at that, and it includes City of Marina and MCWD representatives and Bob Jaques, seaside watermaster	
20	Monterey					07/07 Meeting	Janet Brennan	Does the Monterey subbasin include all of the Corral de Tierra subbasin?	Leslie Girard: Yes, DWR made corrections to include all of Corral de Tierra.	
21	Monterey					07/07 Meeting	Janet Brennan	It seems like there are two distinct subbasin with very different water issues. How are we going to come up with single criteria for the subbasin? Are we going to come up with separate criteria for separate areas?	DW: The criteria, depends on which you're talking about, will be set differently for different areas. However, they must tell a single integrated story. The can be separate, but have to be coordinated. Storage is an example of a single basin criteria. One area cannot prevent another area from reaching sustainability.	
22	Monterey					07/07 Meeting	Janet Brennan	That suggests that the area with the greatest problem will be the one that sets the standard.	DW: Not necessarily. It comes down to negotiation between the areas. What is significant and unreasonable in each area. What is a future condition we can reasonably achieve.	
23	Monterey					07/07 Meeting	Margaret Anne	Very impressed with the job you've all been doing.		
24	Monterey					07/07 Meeting	John Farrow	Not clear if there will be a single GSP to cover both areas. Will it be drafted by this committee or MCWD or the BOD? Do all GSAs need to approve the GSP? Are the jurisdictional areas where they have annexed? Or where there services areas are? Seems to have been given large area. I'm wondering if MCWD representative sought the boundary changes and not DWR, could the MCWD representative give more background? Seems like it has created a complex problem with coordination and the SWIG.	Gary: [map] the green areas are the expanded annexed areas. On left, corral de tierra area. The Ord area in the middle. Leslie Girard: Under SGMA the jurisdictional boundaries of MCWD are its boundaries. That means a GSA cannot impose fees on areas outside of those boundaries. They are service provider for much of the area outside of their jurisdictional boundary. They cannot impose a fee outside of their jurisdictional boundary. DWR allowed for management outside their jurisdictional boundary (MCWD) and SVBGSA will manage the corral area. Patrick Breen: Have nothing to add. We will work together as Leslie Girard described.	
25	Monterey					07/07 Meeting	Sarah Hardgrave	Special request for special meeting to have discussion about the edges of the Monterey subbasin. Especially with respect to Laguna Seca area and impact to Seaside, and how SMC apply to adjacent subbasins and coordination actions with neighboring subbasins, like 180/400 subbasin.	DW: Happy to add that in.	
26	Monterey					7/17/2020 Special Meeting	Sarah Hardgrave	Is subsidence data reflecting only groundwater impacts, or other sources of change?	DW: Yes. Possibly seeing subsidence due to faults in the area. InSAR data is satellite data, if you till field and move land surface, will show up on InSAR. We will add caveats to text, and explain must be due to lowering groundwater levels.	
27	Monterey					7/17/2020 Special Meeting	Janet Brennan	It seems like it would be helpful to have the same subsidence [SMC] as the 180/400.	DW: Great point, SGMA requires us to not cause adverse effects to our neighbors. If we say, can allow 8in drop and they say 0in drop, they can say 'you are preventing us from reaching sustainability.' This is my opinion, if subsidence is not a problem for you, choose 'subsidence is 0 subsidence. There's a right answer and a wrong answer. Yes the 180/400 is zero subsidence.	
28	Monterey					7/17/2020 Special Meeting	Janet Brennan	Lacking data, do we have the possibility of simulation?	DW: I suppose the question is really, how accurate are the simulations? They will probably have used that USGS gage for part of the simulation. Make assumptions that the data is 'good enough'. There will be uncertainty, and we can talk about that uncertainty. We can incorporate the uncertainty by including conservative approaches to depletion, or shallow GW levels.	
29	Monterey					7/17/2020 Special Meeting	Janet Brennan	Doesn't GDE and ISW require monitoring?	DW: SGMA discusses the rate of depletion, not the flow in a stream or level in a lake. We're measuring our impact on SW bodies through GW management.	
30	Monterey					7/17/2020 Special Meeting	Janet Brennan	I don't understand how you can do that without being able to measure your impact.	DW: I'll go over more what we did in the 180/400, and talk about some recommended approaches. What we're looking at, historically, has our pumping cause an undesirable effect on the SW? The easiest one to understand is, is there a flow requirement for fish in the river? Has the current rate of pumping caused you to fail to meet that flow requirement? This is about meeting legal obligations with current rates on depletion. This is not the same as knowing what the flow is at any given time.	
31	Monterey					7/17/2020 Special Meeting	Sarah Hardgrave	Regarding the model, how it is designed, especially with respect to the relationship between SW and GW. I think a lot of these are intermittent streams which flow during the rainy season. Does the model account for that kind of input from streamflows?	DW: Yes it does. The model has a series of stream inputs. Since it is a GW model, the stream inputs are a little rougher than if this was a stream model.	
32	Monterey					7/17/2020 Special Meeting	Sarah Hardgrave	Does it estimate the quantities for different size storm events?	DW: Not in the GW model, but there is a watershed model that is able to estimate runoff. There is a tool that can feed into this and estimate runoff from storms.	

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33	Monterey					7/17/2020 Special Meeting	Sarah Hardgrave	Can you explain how much water is expected to be in a stream?	DW: For the calibrated period, a period of time where we have data, those data will be in the model. We can say, ok it's doing a reasonable job of estimating the amount of water in the stream. So when they simulate future scenarios, they will be able to say if it's a reasonable estimate. The question is, how important is El Toro creek with connection to GW. This is something we'll be looking for feedback on. Is this really driving sustainability or not. We could say, current conditions are unreasonable or not? El Toro creek may be a good one to look at due to less stratification to aquifers.	
34	Monterey					7/17/2020 Special Meeting	Margaret Ann Copernall	Are going to consider the impact on Sea Water Rise?	DW: I will get into it in 3 metrics. Sea Level Rise is an interesting question, and I'll come back to that with sea water intrusion.	
35	Monterey					7/17/2020 Special Meeting	Harold Wolgamott	How are we going to write a caveat? This is depletion of GW level. If there is no GW level, we can't control precipitation, how to we write a caveat to explain that?	DW: I don't know if we do write caveats for GW levels? One of the questions that come up is about when there is a drought? The point of these metrics is we are managing a 50yr plan, long-term averages, towards an objective. We try to account for droughts. DWR understands there will be droughts, and people will fall off their plans. We can write a drought caveat.	
36	Monterey					7/17/2020 Special Meeting	Bab Jaques	You mention if there's a lack of data on GW levels in the Corral area, ideally, even before you establish the SMC, you would want to obtain more data. I don't know if there's time during GSP development to do that, or if you will be using Seaside Model data. What would be the most effective way to handle that?	DW: You're getting to an important distinction. If we say GW levels in 2015 are significant and unreasonable. We can look at what wells we have, set our SMCs there, then say, we don't have enough wells. During implementation, we can look for more wells. Before we have all data, we will set what we consider significant and unreasonable. We can find new monitoring wells in the future.	
37	Monterey					7/17/2020 Special Meeting	Bob Jaques	I understand the GSA received grant money to develop GSP. Can some of that money be used for looking for data?	DW: Ms. Gardner would know more Emily: You do have to have a good grasp on where your data gaps occur so you can provide the missing information. You don't have to have submitted the GSP, but far enough in the process to know where you don't have data	
38	Monterey					7/17/2020 Special Meeting	Janet Brennan	I assume, based on the relationship to domestic wells, 1ft above 2015 levels, accounts for these criteria. They are not mutually exclusive. The GDEs, the domestic well issue, we should be able to address these with one threshold. The relationship of GW levels 1ft above the 2015 levels, whether or not that is consistent with Seawater Intrusion concerns.	DW: two good questions. First, you're correct, these options are not mutually exclusive, and you can set the SMCs that way. You can combine the ideas of GDE and groundwater levels. Second, for Seawater Intrusion, there are a couple ways to look at this. Each of the SGMA 6 sustainability indicators, we have to avoid undesirable results simultaneously. No matter what we say, we have to stop SWI. If we don't use GW elevations to stop SWI, that's ok, find another way. You can define everything separately. Some people have tried to address everything all together, stitched together with a GW elevation map. It kind of assumes you already know your projects and actions ahead of time. You have SGMA 6 undesirable results to avoid simultaneously. You can be well above your GW elevation minimum thresholds for SWI, and meet both.	
39	Monterey					7/17/2020 Special Meeting	Janet Brennan	Because our approach to Seawater Intrusion is more to stop the Seawater Intrusion and not related to Groundwater levels, are they compatible?	DW: Say there are two ways to approach this: raise all GW levels and push it back, or drill wells and draw the water down. We may not want to predicate it all together. Things can change in the future. It is a complicated topic.	
40	Monterey					7/17/2020 Special Meeting	Sarah Hardgrave	Do we have data in the Corral subarea in terms of the number of wells and kinds of wells they are? I understand domestic wells serving 1-2 households are not regulated, considered de minimis under the law. I understand these wells are the primary types of wells in the Corral area. Can the de minimis users be considered cumulative?	DW: You are correct, we have some data from the Corral area. I will point out we are missing some data from this area. It is a data gap we have to fill, and it will cause us a problem to implement a threshold. You're right, any well that serves a household, no crop, less than 2AFY, de minimis. We cannot force domestic well owners to report to pumping to the GSA or to DWR. I believe we can include them in the management structure, both individually and collectively, but I don't know how just yet. Marina P: We can ask Les Girard to help clarify.	
41	Monterey					7/17/2020 Special Meeting	Sarah Hardgrave	Without understanding the number of wells, their depths, and how much they're pumping, it seems hard to manage. I am aware for the CALAM managed systems, Ambler and Toro, they have a water quality question with regard to arsenic.	DW: Yes good to know that it should be one of the drivers of our groundwater elevations.	
42	Monterey					7/17/2020 Special Meeting	Janet Brennan	I assume this does not address the deep aquifer?	DW: It will include the deep aquifer. It doesn't show up in the whole basin. If we set the total pumping, it will include the Deep aquifer.	
43	Monterey					7/17/2020 Special Meeting	Janet Brennan	How did we address it in the 180/400?	DW: We do not set this aquifer by aquifer, we address it as a whole basin. So, this will include the deep aquifer.	
44	Monterey					7/17/2020 Special Meeting	Sarah Hardgrave	Because the SWI is occurring in the MCWD management area, what roll does this committee play in working with MCWD in setting this SMC? Will we have the opportunity to weigh in? Will that be done solely by MCWD then negotiated?	DW: There is a good working relationship right now between the GSAs. The decision-making details have not been worked out. We will continue working cooperatively.	
45	Monterey					7/17/2020 Special Meeting	Beverly Bean	I was under the impression that MCWD has already written a GSP and when can we see it?	DW: We are writing a single GSP with eki.	
46	Monterey					7/17/2020 Special Meeting	Beverly Bean	Does their GSP cover the 400 acres?	Gary: The City of Marina has written their GSP. We have read it and commented.	
47	Monterey					7/17/2020 Special Meeting	Beverly Bean	Will we be looking at that plan as this committee moves forward? I suggest we look at it to incorporate all available input.	Gary: Derrik is well aware of the plan	

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Number	Subbasin	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
48	Monterey					7/17/2020 Special Meeting	Beverly Bean	Is our GSP to replace the plan that Marina wrote?	Sarah: I don't believe so, that area is not in our subbasin. It's in the 180/400 DW: We are not replacing their GSP, it's not in this subbasin Gary: That plan was for an area within the 180/400 subbasin and does not impact our subbasin or GSP	
49	Monterey					7/17/2020 Special Meeting	Tamara Voss	I'm with MCWRA, and I'm with group that creates the SWI maps. The area to the south in both the 180' and 400' SWI maps are areas where there is a large data gap. We put a gray band with black question marks to denote the missing data on our maps. I want to make sure everyone knows this is an area with missing data.	Comment Received	
50	Monterey					7/17/2020 Special Meeting	Tina Wang	I want to tack on, there is a limited number of wells along the coast for data. There are the sentinel wells put in by the Seaside watermaster and we will look in to those wells.	Comment Received	
51	Monterey					7/17/2020 Special Meeting	Bob Jaques	The Salinas Valley Integrated model is going to be used for modeling purposes for all Salinas Valley GSPs. How will that be coordinated with the Seaside GW Model, especially with respect to the Corral area? Do you envision any model runs during Corral GSP development? Or will that be after the GSP approval and implementation.	DW: I believe the USGS has the Seaside model and will incorporate it. There may not be significant differences, but we'll have to negotiate out the differences if they are important. We will run the model during development, several simulations to work out projects and actions.	
52	Monterey					7/17/2020 Special Meeting	Sarah Hardgrave	I observed a discussion of the Seaside watermaster and the area where there is a data gap along Fort Ord and to the Coast. I would like to have a conversation about how the monitoring network can be expanded because I don't think we can rely on existing data.	Comment Received	
53	Monterey	3	Table 3-2 Existing Well Types			07/16/2020 JotForm Submission	Heather Lukacs	We request that this table include all Monterey County regulated drinking water systems and clearly distinguish between type of drinking water system. Local small water systems serve 2-4 connections, state small water systems serve 5-14 connections, private domestic wells serve 1 connection. In addition this table should list agricultural and industrial users as separate well types. This distinction is made in Figure 3-6 but not in this Table. It is important to distinguish between well type here in order to set the stage for good water budget estimates, for the monitoring network, and throughout the plan. This data is all readily available to the public and GSA.	Submission Received	
54	Monterey	3				7/10/2020 email	Heather Lukacs	Revise the description of the plan area to include the type and location of all water systems and private domestic wells that serve drinking water users, their current groundwater quality conditions, and the number of people served. All public water system service areas and state and local small service areas should be included in this chapter as well as a list of all these system names, water system ID numbers, and number of service connections (or population served). Private wells should also be identified as being groundwater-dependent drinking water supplies. All public water systems and state/local small water systems are important to identify and include in this chapter because all are reliant on groundwater, many are highly vulnerable to water level and water quality changes, and all will be impacted by the way groundwater is managed in the basin. Adequately characterizing the public water systems, state and local small water systems, and domestic wells in the GSP is important to set the stage to: (1) better identify areas that are vulnerable to groundwater level, groundwater quality, or seawater intrusion challenges, (2) quantify drinking water demand in the subbasin for both the current and projected water budget, (3) provide a basis for the monitoring network of drinking water supplies, and (4) ensure inclusive and representative engagement of drinking water users in the planning process.	Email Received	
55	Monterey	3				7/10/2020 email	Heather Lukacs	Revise Chapter 3 to include a specific discussion, supported by maps and charts, of the spatial or temporal water quality trends for all constituents that have exceeded drinking water standards and may affect drinking water beneficial users, as required under 23 CCR § 354.16(d). In the 180/400 Foot Aquifer GSP, Tables 8-6 through 8-9 for all public drinking water wells (including those listed in Appendix 7E), state and local small water system wells, and private domestic wells were included which indicate that the consultant has this data available. It is important to include all water quality data (both in map and tabular form) for all constituents that will have minimum thresholds later. Water quality is an important part of the basin setting. See map viewer from Greater Monterey County RWMG of all available water quality data for state and local small water systems in Monterey County: http://www.greatermontereyirwmp.org/documents/disadvantaged-community-plan-for-drinking-water-and-wastewater/	Email Received	
56	Monterey	3				7/10/2020 email	Heather Lukacs	List domestic water use and/or rural residential water use under the Water Use Section (Section 3.2.2). This section indicates that, "Domestic use outside of census-designated places is not considered urban use." Even if the Monterey County Water Resource Agency (MCWRA) does not report rural residential use, it is an important beneficial use and should be listed as a "water use sector." Water use estimates for state and local small water systems could be based on the number of connections served by each water system (which Monterey County has on file).	Email Received	
57	Monterey	3				7/10/2020 email	Heather Lukacs	Revise Chapter 3 to include a map of the service areas of all of the state and local small water systems like in the 180/400 foot aquifer subbasin. The 180/400 Foot Aquifer GSP mentions 136 small water systems in Chapter 7, page 7-20 of the 180/400-Foot Aquifer GSP (January 3, 2020) which indicates that the consultants have this data. We recommend that this data for all Salinas Valley subbasins be included in a map in Chapter 3 of each GSP, be clearly labelled, and have an associated table with key information. The Monterey County Environmental Health Bureau (EHB) maintains publically available data which includes shape files of state and local small water system service areas (e.g. polygons of all parcels served by each state or local small water system) to water system IDs. Lists of state and local small service areas and out-of-compliance water systems are available online on their state and local small water system webpage. Monterey County EHB also maintains individual files for each SWS and LSWS in the County, which often contain well completion reports for each system. All water quality data, location data, and well completion reports are publically available upon request from the Monterey County EHB.	Email Received	