

COMMENTS RECEIVED JULY 20, 2020 TO SEPTEMBER 18, 2021

Number	Subbasin	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
1	Upper Valley	9				08/03/2020 Meeting	Roger Moitoso	RE: GSP Development Process Update: As we get to October, you'll be looking at projects. As we sit now, we have the basin and reservoirs. Those reservoirs control 55% of the recharge in the basin. It's a manipulated recharge. The biological opinion was tied into the last project we built is now expired. NMFS and everyone is pushing for a habitat conversation plan which can be lengthy and robust. I think this committee should get on board with the HCP, and see what that does to the operation of the reservoirs and what that does to the Upper Valley. There have been a few studies I've shared with committee members about the historical benefit analysis for before/after reservoirs. The benefit to the southern half of the Upper Valley was basically nil. Between the Green Bridge at San Lucas to the King City Bridge there was some groundwater elevation gain from conservation releases, but not much. The Committee should keep in mind that the Habitat Conservation Plan that wants more water released to match fish flows from the Arroyo Seco can change how the reservoirs are run, and it will impact our sustainability and recharge. When we did Salinas Valley Project, we did EIR. Between voting yes and building the reservoirs, the EIR and mitigated measures changed and they came up with a biological opinion. Then there were different releases and different mitigated measures. Before we discuss projects and fee structures, let's know what we got. If the HCP completed in 2023 upends and derails everything we do for the GSP plan submitted in 2022, then we didn't accomplish anything. We know the HCP is coming, so let's keep that in mind.	Comment received	
2	Upper Valley					08/03/2020 Meeting	Jason Smith	In order to discuss projects, we need to know things we may not know now. I know this plan is due January 2022, and some of this is putting the cart before the horse, but my understanding is that it's a live document, nothing is concrete.	Comment received	
3	Upper Valley					08/03/2020 Meeting	Bill Lipe	Somewhere between Greenfield and King City, east of 101, the southern end of the Forebay and the entire Upper Valley, are dependent on reservoir releases. Depending on how those releases are managed will dictate the conditions we have. The HCP is likely going to change how things work. Everyone is open to that, and it's going to dictate how things go in the Upper Valley. There's also an agency lobbying for a major project in Monterey County, which this Agency doesn't have any say over, and we don't know how that will impact things.	Comment received	
4	Upper Valley					08/03/2020 Meeting	Nancy Isakson	I am concerned that the committee will not see the revised chapters. They'll provide direction, but not have the opportunity to see those changes before they go to the advisory committee and board. I think it would be stronger to allow the committee members to see and approve the changes.	Comment received	
5	Upper Valley					08/03/2020 Meeting	Tom Virsik	One thing to keep in mind, the GSP is due January 2022. The other reports are due when they are due. You don't know when they will come out, but there is potential value in the GSP being as thorough as possible, and those other reports coming later will take the GSP into consideration. Moving forward with a reasonable pace is probably in your best interest.	Comment received	
6	Upper Valley					08/03/2020 Meeting	Jason Smith	Will there be an opportunity to see those changes before the chapters go to the advisory committee?	Emily: I think everyone agrees that would be really ideal. However, there are major time constraints. M&A is creating these chapters as we're going, and to ask for editing as they go effectively doubles their workload.	
7	Upper Valley					08/03/2020 Meeting	Jason Smith	I think we need them to vet ideas pretty well. I understand the framework and timeline. We're not building a project yet, we're creating a living document that will change over time. Should be robust enough to start off.	Emily: What you're asking for is to get a good sense of the response and the action taken for each comment.	
8	Upper Valley					08/03/2020 Meeting	Jason Smith	As we go further, it will get more complicated. I understand Nancy's point, and I believe as we do this process, there's going to have to be some trust. People just don't want to get backdoored and we need to make sure we are comfortable with the process.	Emily: If we use the strategic direction tool, we can get the input we need and the components we can commit to while explaining the degree of uncertainty. DW: I think it's a pretty good idea. When we go through the action items, we can give an opinion about whether we think we can implement it or if we need to do more research. For example, this group expressed at the last meeting that the GSP should be written from the perspective that it is already sustainable. I can confidently say on some things we can agree on. Other comments, we'll have to say "we'll get back to you" but we can definitely respond to the strategic direction.	
9	Upper Valley	8				08/03/2020 Meeting	Jason Smith	RE: Subsidence: You're looking at data for the last four years, but what are we missing?	DW: We're looking at the last four years because that is what is available. There are UNAVSCO sites, but they are in the mountains and they monitor more for tectonic changes. Because GW elevations have been fairly constant throughout the valley for many years, and a lot of that geology doesn't lend itself to subsidence, I feel fairly confident that it's not a problem.	

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10	Upper Valley	8				08/03/2020 Meeting	Bill Lipe	RE: Depletion of ISW: How does this relate to GW levels? When you look at Upper Valley, these two things may be related.	DW: You're asking about the SMC relationship, not the physical relationship? So, let's say you think you can deplete more surface water, which means you can lower shallow GW levels. But for GW levels, you like where they're at. That's all okay. But you have to meet both of those criteria at the same time, and the higher GW level SMC will likely trump the other.	
11	Upper Valley	8				08/03/2020 Meeting	Bill Lipe	What would be an acceptable surface water level? We know in 2016, even all the way back to the 1940s, water levels are fairly constant. In the 90's it went down and in the '14, '15, '16 water years, they went way down. I'm thinking these two criteria are intertwined. If the GW water level goes down, there's going to be a certain amount of recharge that needs to occur, and will occur, depending on the reservoir release rate.	DW: These criteria are very intertwined. For a fairly shallow aquifer in close connection with the river, these are absolutely connected. When you think about these to give advice, if you say, you want to lower GW levels, you're also saying you're okay with more stream depletion.	
12	Upper Valley	8				08/03/2020 Meeting	Roger Moitoso	I think you touched on it. When you look historically, even when the reservoirs were built, the releases were always made. That depletion in '14, '15 and '16 was by the reservoir [operation], not by pumping.	DW: This is definitely going to be a discussion when we talk about projects. We will talk about undesirable results, and the undesirable results to avoid from the past.	
13	Upper Valley	8				08/03/2020 Meeting	Ann Myhre	What Derrick suggested earlier, that we use GW elevations as a proxy, maybe some of these things will resolve themselves automatically.	DW: Good suggestion, please bring it up again in a couple of months. It might bring things together more clearly.	
14	Upper Valley	8				08/03/2020 Meeting	Jason Smith	Re: Groundwater Elevation: Thinking about all our normal North/South disagreements, my question is as we put this together, and we are charged with no basin harming another basin, how can you and staff help convey that? Say we choose a GW/SW level criteria, and people in the North say "oh, well, they're going to keep doing what they're doing." How do we scientifically show that it's not going to negatively impact them in the North?	DW: This gets back to the point that it's an iterative process, but initially set the thresholds you want. As we make our way through the process, and we see, "oh, this may be very expensive." So you look at some other options that can reduce cost, and you say, "oh, well, maybe we take less." You may also want to consider seasonality, because it gives us more options how we operate things, and reduce costs, and get something out of it for everybody.	
15	Upper Valley	8				08/03/2020 Meeting	Mark Bloom	Because of Jason's comments about the politics between the north and the south, as we make our suggestions [to the GSP], but we're not able to respond, the north is going to redline those and we won't be able to go back and forth and discuss.	DW: The only place that people outside the basin have some say in your plan is at the BOD level. This plan is for this subbasin. What we hear from you, as strategic direction, is how we'll move forward to the best of our ability. I don't believe there are people in the north that will torpedo this. I think this management system is set up so that the only people who have veto power are the people at the Board level.	
16	Upper Valley	8				08/03/2020 Meeting	Jason Smith	At the Board level, there's also a three quarters vote by Ag for fees and extractions. My other question, you have the 180/400 that's already turned their Plan in, if the 180/400 set the GW levels at the 2015 level, how does the Agency go back iteratively work with other subbasin decisions?	DW: We're already planning on rewriting the 180/400 GSP. When the 2022 GSPs are submitted, there will also be a redraft of the 180/400 so all of the GSPs will work together.	
17	Upper Valley	8				08/03/2020 Meeting	Bill Lipe	In 2015/2016, we know it was tough south of the confluence. North of the confluence, they benefitted from the recharge from the Arroyo Seco. We need to make sure we have the releases to keep the water levels up, and improve the conveyance. How many wells are we using to determine the GW elevations in the Upper Valley?	DW: We're using all the wells the MCWRA takes water levels from to create our contours. Something like 15-16 hydrographs, admittedly concentrated along the river. There is a large portion of the southeast of the subbasin where we are missing data.	
18	Upper Valley	8				08/03/2020 Meeting	Bill Lipe	I've seen the letters to have well owners be a part of the monitoring network. Does that list gradually expand?	DW: Yes, absolutely the list can expand. It also means that well becomes a place where we have to hold minimum thresholds. I will say it makes our lives better to have more data points.	
19	Upper Valley	8				08/03/2020 Meeting	Bill Lipe	Once you get away from the river, you have a different situation, or maybe some of the wells aren't being used. Can a subbasin be fractured into separate pieces? From south of King City, the underground is very different, especially with depth and width.	DW: We will not separate this subbasin into fractions. We do have management areas in other subbasins, but we don't have enough data to support that in this subbasin.	
20	Upper Valley					08/03/2020 Meeting	Tom Virsik	I think from what's been explained, that if there are changes to the 180/400 GSP and any conflict, there will be integration. The integration committee will take a first look at that, to hopefully mitigate any surprise.	DW: You're absolutely right, that's the point of the ISP committee.	

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21	Upper Valley	8				08/03/2020 Meeting	Roger Mottoso	RE: Degraded Water Quality: This question goes back, a comment always comes up, "the UV is highly dependent on reservoir releases". I want to caveat that, by saying the UV is highly susceptible to reservoir releases. The historical analysis broke the valley up in to 11 subbasins; the UV was broken in two (northern end and southern end), the Forebay was three parts. There are five separate subbasins south of Gonzales and they all act different. Above the Arroyo Seco, there's no change because it's not altered. When you get to Lower Eastside Forebay and the lower Upper Valley, that's not a true statement. We saw in 2015 and 2016, the UV was upended. The ways the reservoirs were operated made the UV almost blow away. Get the Salinas river running in concert with the Arroyo Seco, it'll work out.	Comment received	
22	Upper Valley	8				08/03/2020 Meeting	Jason Smith	I understand everything Roger is talking about. How does that play in to the discussions in your decision making? If we had no dams, if we used the five basins as Roger said, it'd be sustainable. But we have the reservoirs, and if we didn't have them, we wouldn't have the kind of agriculture we have.	DW: My general comment with the GSP is we build it with what we have today. It cuts both ways, we have a system to move water around and it makes are hydrology different. There is no intent to go back to previous situations. My approach is to deal with what we have today to deal with GW problems. Also why we havn't included the interlake tunnel project.	
23	Upper Valley					08/03/2020 Meeting	Bill Lipe	What is the GSA estimate for overdraft for the whole Salinas basin?	DW: I believe it's on the order of 25,000 AFY.	
24	Upper Valley					08/03/2020 Meeting	Bill Lipe	What's the estimate overdraft for the UV?	DW: Approximately 170 AFY	
25	Upper Valley					08/03/2020 Meeting	Bill Lipe	Did you say that the sustainable yield was overestimated?	DW: You heard correctly. It's a problem for basins that not overdrafted and are in sustainability. It's hard to say what the sustainable yeild is because the boundaries haven't been pushed to find it. The UV could be able to pump more and still be OK.	
26	Upper Valley					08/03/2020 Meeting	Bill Lipe	Would all subbasins be okay if there were no dams? Or would some areas have the same problem they have today?	DW: I would say yes, the reservoirs have benefitted some parts of the basin. They would look different (without reservoirs).	
27	Upper Valley					08/03/2020 Meeting	Bill Lipe	Would some of these projects require more water to be stored or released?	DW: I would say yes but the timing of the release is important.	
28	Upper Valley	5				08/03/2020 Meeting	Tom Virsik	On page 87, page 5-29, sect. 5.5.1 Data Sources, "There are currently no datasets that show reaches of interconnected..." When I read that, my impression was that the shallow aquifer in the Upper Valley is generally connected with the stream. This sentence suggests that nobody knows if that's true. If it's about the datasets, even if everyone knows, then the model is then characterized as the data. Is it nomenclature? I look at this language and it seems odd.	DW: We will clarify that. We are specifically talking about the datasets, the proof. The way the regulations are written, in this one situation the model is considered "data".	
29	Upper Valley	5.5.1		5-29		08/03/2020 JotForm	Tom Virsik	The first sentence states there are no datasets showing interconnected surface water. Discussion of the interconnected surface water SMC (including on 3 August) reflect a consensus that substantial parts of the River are connected to the shallow aquifer in the Upper Valley. That this content at Chapter 5 is preliminary and will later be updated with SVIHM analyses is understood, but 5.5.2 lacks any notation of any pre-model analysis or even suspicions. Reading only the draft content of Chapter 5 falsely creates the impression that the GSP creator(s) presently believe surface water is not interconnected. Suggestion: if the content will be circulated gain in its premodel state, include language that the modeling is "expected to show / detail/ identify etc." surface water connection. Ideally, the later draft(s) can also crossreference the GW SMC, as it is interrelated in this basin. Note also that 7.6 at page 7-16, section 5.5.1 is crossreferenced in support of a statement of "potential connection."	Comment received	

NOTE: Comment letters received are located in "Comment Letters" file also located on the website GSP Subbasin Page