

## Forebay Aquifer Subbasin Groundwater Sustainability Plan Development

### Comment Letters Received

[Lukacs. 071020](#)

[Lohr. 101920](#)

[SVWC. 110320](#)

[Virsik. 110420](#)

[Sang. 110820](#)



Emily Gardner &lt;gardnere@svbgsa.org&gt;

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## Recommendations for Langley and other subbasin GSPs related to drinking water users

6 messages

**Heather Lukacs**

Fri, Jul 10, 2020 at 2:06 PM

To: gardnere@svbgsa.org

Cc: Donna Meyers &lt;meyersd@svbgsa.org&gt;, Gary Petersen &lt;peterseng@svbgsa.org&gt;, Horacio Amezqutia

Thomas R Adcock Justine Massey

Hi Emily, Gary, and Donna,

I appreciate the process allowing for comment on the early drafts of the subbasin GSPs.

Tom, I have included you so that you can see Figure 3-5 that I referenced during my comments at today's meeting - in order to help make sure Alco and Pajaro Sunny Mesa CSD boundaries are accurately represented (see attached), and also because you indicated interest in helping support outreach to water systems.

We at CWC are happy to support in identifying, ground-truthing, and outreach to drinking water users in the Langley Subbasin and other subbasins in the Salinas Valley.

The first step we recommend is to generate a list of the following to support outreach and also to include in Chapter 3 of the draft subbasin GSPs:

- Public water systems - which serve over 15 connections
- State and local small water systems - which serve between 2-14 connections

We at CWC currently have lists for both types of systems from Monterey County Environmental Health (along with contact information for each water system). This information was also used by the GSP consultants in the 180/400 GSP so they should also have these lists with location and water quality information for all water systems in the subbasins.

Next, we recommend creating maps of the location, water quality, and other information of all drinking water supply wells - which came up during today's meeting. For the 180/400 Foot Aquifer GSP, Figure 7-9 Public Water Supply Wells was included together with Appendix 7E (see attached) which has water system names, well construction information, coordinates, and monitoring data range. (see more on this below).

Lastly, these maps and lists can then be shared with local drinking water users who can provide feedback and help groundtruth the information. This could be part of a drinking water workshop - is the information we have accurate? Given this information, is the monitoring network accurate? Are drinking water users collecting other information that could be added to this plan?

I look forward to discussing this and also more specific recommendations (see below) for Chapter 3 of the Subbasin GSPs.

Thank-you,  
Heather

Recommendations for Chapter 3 of Subbasin GSPs

- **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.

- **Revise Chapter 3 to include a map of the service areas of all of the state and local small water systems 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 SSWS 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.
- **Update water system boundaries in Figure 3-5** (Langley, 6/28/2020 GSP) to reflect that Alco no longer operates wells in this area, and update Pajaro Sunny Mesa CSD water system boundaries.
- **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).
- **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/>.

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 Heather Lukacs, PhD  
*Pronouns: She/Her/Hers*  
 Director of Community Solutions  
 Community Water Center

CA 95076

CA 95814

**All CWC staff are currently working remotely. Please reach all staff via email and cell phone.**

**2 attachments**

**DATE:** 10-19-2020

**TO:** Emily Gardner & FOREBAY Subdivision Committee

**FROM:** Jerry Lohr

**RE:** Request for comments from 10-16-2020 7:19 PM

Thank you for your request. I have been a landowner in the Greenfield area since 1971. We now use Arroyo Seco water from the Clark Colony canal and reuse our treated water from our J. Lohr Winery on Cypress Avenue for direct irrigation. I am also a member of the SVWC.

I am very supportive of the winter release program using the Salinas River as a conduit to the SRDF. I suggest we get a realistic cost on the irrigation wells ASAP. We need to work closely with MCWRA. From data I have seen, in most years that should be a very good program.

Eradication of the Arundo Donax is also a very good move. It should alleviate the potential drop in well water heights along the Salinas River in summer. I have heard that the Arundo Donax could use as much as 50,000 AFY in the Salinas Valley.

We at J. Lohr employ several water use optimizations currently in our vineyards. We use pressure bomb data to suggest our next irrigation. We, thus, irrigate more in the spring and the fall and use longer irrigations. I supported research by Dr. Andrew McElrone at UC Davis which led to his student Tom Shapland developing a process called surface renewal which is now known and available as Tule which works well for larger, more uniform areas. I also co-support Karen Block of UC Davis to hold extension meetings to demonstrate these and other new techniques to support efficient water use. It would be great to reach a wider audience and share this type of research with other Monterey County growers. I would support a virtual program sometime later this fall or early next year if the SVBGSA would get behind and promote it. The presentation would probably need to be available at least two times to catch more potential users during their slow period. This could demonstrate reduced pumping options. Forced reduced pumping, as you indicated, is going to be unpopular. My suggestion would be to find some technology suppliers and local users such as T&A, Taylor Farms or D'Arrigo to co-sponsor, so their growers would be encouraged to attend.

The drought reserve idea is very good because a lot of grower energy has been focused on the dam operation. The drought reserve is a good concept, and quite frankly what growers expect when a dam is involved.

# Salinas Valley Water Coalition



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(831) 674-3783 • FAX (831) 674-3835

TRANSMITTED VIA EMAIL

Salinas Valley Groundwater Sustainability Agency  
Atten: Ms. Emily Gardner, Deputy General Manager

3 November, 2020

## **Re: SVBGSA Forebay Subbasin GSP, Projects and Management Actions**

Dear Ms. Gardner;

We appreciate this opportunity to comment on the proposed/discussed Projects and Management Actions set forth in the Salinas Valley Basin Groundwater Sustainability Agency's ("SVBGSA") Groundwater Sustainability Plan ("GSP") for the Forebay (FB) Subbasin. We ask that you share/distribute our comments to the FB Subbasin GSP Committee prior to its scheduled committee meeting on November 4<sup>th</sup> so that the Committee is afforded an opportunity to review and consider the comments ahead of the meeting.

We offer the following comments for your consideration:

### **1. Winter Reservoir Releases with ASR:**

The Salinas Valley Water Coalition (SVWC) supports the consideration and pursuit of a Winter Reservoir Release Project (Winter Release). We believe it can provide significant and diverse benefits to the fishery and environmental resources as well as aquifer recharge to benefit lands within the entire Salinas Valley Groundwater Basin. The SVWC has advocated for a winter release project/program since 2014, albeit in a slightly different manner than that presented by the SVBGSA. We believe the development and consideration of a Winter Release Project/Program is a great opportunity to maximize the benefits of existing approved projects by utilizing (or enhancing) existing infrastructure.

We also believe that the Winter Release Project could be implemented prior to completion and adoption of a Habitat Conservation Plan (HCP), and that it can then be enrolled in the HCP as an 'existing project/program' as the HCP is being developed.

In 2015, the SVWC challenged the Monterey County Water Resources Agency (MCWRA) on its operations of the reservoirs during the most recent drought period. In order to settle our differences, the SVWC and MCWRA executed a settlement agreement

***Mission Statement: The water resources of the Salinas River Basin should be managed properly in a manner that promotes fairness and equity to all landowners within the basin. The management of these resources should have a scientific basis, comply with all laws and regulations, and promote the accountability of the governing agencies.***

on November 15, 2019. This is a public document and we have attached the sections that are relevant to this discussion for your information.

We share this with you because one of the elements of the settlement agreement is for the SVWC and MCWRA to work together to consider and discuss: “1) the overall effects associated with implementation of the Winter Release Scenario; and 2) any anticipated benefits to environmental resources including but not limited to benefits to steelhead, of implementation of the Winter Release Scenario.”

In order to evaluate whether the Winter Release Scenario warrants further consideration and implementation, the Settlement Agreement requires the MCWRA and the SVWC to separately model the Winter Release Scenario (using two different models) to jointly review the results of the separate modeling efforts in order to determine whether to move toward a pathway for its implementation if the modeling results support the perceived benefits.

The operation and implementation of the Winter Release Scenario detailed in the Settlement Agreement is different from the Winter Reservoir Release Project presented by the SVBGSA, in that we rely solely on existing infrastructure and projects; thereby limiting the capital costs for construction. To the contrary, the Winter Reservoir Release Project of the SVBGSA, requires substantial ‘new and additional’ infrastructure at significant costs. That said, the Coalition is not dismissing the SVBGSA’s Winter Reservoir Release Project outright and believes that this more costly project may be warranted should further studies support its benefits.

The Coalition’s proposal for reoperation, which incorporates the Winter Release Scenario, as set forth in the Settlement Agreement may occur immediately to provide benefits to the entire Salinas Valley Groundwater Basin well ahead of the SVBGSA’s many procedural requirements prior implementing its project such as water rights permit amendment, preparation of engineer’s report, vote under Proposition 218, preparation of environment impact report, etc. That is, there is no need to wait for the HCP or for the SVBGSA to satisfy its procedural requirements for the SVBGSA’s project to implement the reoperation to incorporate the Winter Release Scenario in order to receive its benefits.

Based on our model results, ‘the Coalition’s Winter Release Scenario provides for greater reservoir releases during the winter months to provide additional recharge and fishery migration opportunities, while continuing to operate the Salinas Valley Water Project as approved, including continuing to, and possibly increasing, the amount of water diverted at the Salinas River Diversion Facility (SRDF) during the irrigation season to provide deliveries to the CSIP growers.

While we are continuing to work with the MCWRA to refine and finalize the modeling, the Coalition’s initial model results show that a Winter Release Scenario could be implemented in approximately 75%-85% of all years (and all year type), providing significant benefits for additional fish passage days, additional environmental releases and recharge to the aquifer during a period when riparian vegetation is dormant. It also allows for storage and more efficient use of captured and stored water and releases during the irrigation season for lands within the Salinas Valley Groundwater Basin; while respecting the water rights within the Basin.

It is important that we work together to manage our costs and resources and not duplicate efforts on ‘similar’ projects/programs, Hence, we should work together to

evaluate the results of a winter release project/program in order to develop components/elements/alternatives that maximize benefits and minimize costs.

**Recommendation: We request that the SVBGSA collaborate and work with the MCWRA and SVWC in regard to the development of a Winter Reservoir Release Project. We request that you direct your technical consultant and a staff member to work with the MCWRA and SVWC on evaluating the modeling results and developing the end project that would maximize benefits and minimize costs.**

2. **Invasive Species Eradication: The SVWC supports the pursuit of this project.**

3. **Conservation and Agricultural BMP's:**

The SVWC supports implementation of conservation and agricultural BMP's. The MCWRA adopted and implemented a strong conservation and agricultural BMP program over 20 years ago and we believe the agricultural community has done, and continues to do, an amazing job of implementing on-farm conservation measures.

**Recommendation: The SVBGSA should collaborate and work with other agencies, including the MCWRA, to support and improve the existing conservation and agricultural BMP programs. The collaboration should also include working to support and improve, as applicable, domestic water use conservation measures.**

4. **Pumping Limitations:**

The SVWC conditionally supports having pumping limitations as a 'tool' in the toolbox of 'projects' for the SVBGSA – however, this support is based on the following:

1. It should be recognized that the Salinas Valley Groundwater Basin is not a 'one size fits all' basin and hence, any consideration of and need for pumping limitations should be analyzed for each individual subbasin, or portions thereof, to determine whether such a drastic measure is needed to achieve sustainability for those particular areas. Because of the massive size our subbasins, pumping limitations may only be required for certain limited areas of a subbasin.
2. Because we do not recommend a basin-wide pumping limitations, specific criteria and standards must be developed to focus in on the specific areas of a subbasin that would be subject to the pumping limitations. These specific criteria and standards should clearly define the details of 'when' and 'how' any pumping limitations are to be implemented (i.e., need to develop time, place and manner of the pumping limitations).

**Recommendation: The SVBGSA should include Pumping Limitations as a potential project, but additional data and information must be developed first in order to establish the applicable criteria and standards for triggering such a limitation for a particular area of a subbasin.**

Thank you for your consideration of the foregoing comments.

Sincerely,

*Nancy Isakson*  
Nancy Isakson, President  
Salinas Valley Water Coalition

4 November 2020

To: SVBGSA Public Comments Form Salinas Valley Basin Groundwater Sustainability Agency (GSA) Forebay Subbasin

Re: November 4, 2020 meeting - Agenda Item 4.f. – Draft Chapter 8

These comments and queries are directed to the version of Chapter 8 presented at the 4 November Forebay committee meeting. I understand the chapter will be revised and these comments are directed only to certain content that appears unrelated to the "still in progress" portions, generally flagged with red text.

Query: What/who is the "appropriation" listed on the first horizontal line of Table 8-8? My assumption is that it reflects a permit from the SWRCB, but that it seemingly was not exercised in 2013 and forward is noteworthy and calls into question its identity. Please provide more information, e.g., a permit number. Page 8-38.

Comment/query: The second horizontal line of Table 8-8 is a cumulative category of water diversions that seemingly does NOT include appropriative water rights. "The one appropriative water right holder in the Forebay Subbasin is shown in Table 8-8." Please note that statements of water diversion can be based on appropriative rights that do not statutorily require a permit or license, i.e., pre-1914 rights. The implication of the Table description and the sentence below the Table suggest that the GSA has concluded that the statements of water diversion do not include reports of water diverted pursuant to appropriative (including pre-1914) rights. My clients in the Upper Valley and Forebay claim the right to divert water based on, inter alia, rights that fall into the pre-1914 category and have reported their diversions to the SWRCB on that basis for decades and report those extractions to the MCWRA pursuant to the local ordinance. The GSA recognizes that dynamic. "Some of the diversions shown in Table 8-8 are also reported to MCWRA as groundwater pumping." Page 8-38.

I suggest that the first line of Table 8-8 read (if accurate) as "Appropriation per Permit" or similarly. The sentence following could be adjusted to say: "the one permitted appropriative water right holder . . . ." By a more precise recitation, the GSA could avoid the implication that it is taking a position on the water rights involved vis a vis permitted appropriators (including the MCWRA), those diverting pursuant to pre-1914 rights, and those diverting pursuant to other rights (e.g., riparian).

Very truly yours,  
Thomas S. Virsik



Emily Gardner &lt;gardnere@svbgsa.org&gt;

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**Fw: 11/4/20 Forebay Subbasin Committee Meeting**

3 messages

**Yahoo Mail** <sangjames@yahoo.com>

Sun, Nov 8, 2020 at 8:47 PM

Reply-To: Yahoo Mail &lt;sangjames@hotmail.com&gt;

To: Donna Meyers &lt;meyersd@svbgsa.org&gt;, Emily Gardner &lt;gardnere@svbgsa.org&gt;

Cc: james sang &lt;sangjames@yahoo.com&gt;, Bruce Taylor &lt;btaylor@taylorfarms.com&gt;, Andrew Fisher &lt;afisher@ucsc.edu&gt;

Good Evening,

I, James Sang, attended the Forebay Subbasin meeting and I spoke about my idea about water aquifer recharge and Mr. McIntyre asked if I could send more details about my idea. The following are my thoughts:

My idea is to build rainwater collection areas around the well heads. The collection areas can be anywhere from 10,000 square feet area to a foot ball size area (57,000 sq ft) to even larger. In this area will be 2 feet wide by 3 feet deep swales. On level ground they can be built anywhere close to the well head. In a sloping area , the swales would be built across the slope of the ground. The purpose of these swales are to collect the rainfall. The amount of water that can be collected is tremendous. A football size collection area can collect over 500,000 gallons of water a year, based on Salinas California rainfall of 15 inches per year. This should be able to help recharge our dwindling water aquifers.

As an experiment we should start with a shallower well , maybe 100 or 200 feet deep. This would have a better chance of working.

The swales should be designed in a certain way. They should be large enough to catch all the rainwater and deep enough to protect it from the heat from the sun and the wind, which are the major causes of evaporation.

I remember that one of the attendees said that if this was built on farm land, the County may not approve of the project. I assume that the reason is because of the potential of soil nitrogen to go into the water aquifer. There is a solution for this . At UC Santa Cruz, they have experimented with using wood chips to eliminate this problem. They sprinkled wood chips at the bottom of their water collection ponds. This was successful in reducing the nitrate!

Can you pass this email to Mr. McIntyre and anyone else who you think might be interested?

Thank you.

James Sang      [sangjames@yahoo.com](mailto:sangjames@yahoo.com)