

COMMENTS RECEIVED FROM October 30, 2020 - January 4, 2021

Number	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
1					11/4/2020	Jerry Lohr	Re: ASGSA-SVBGSA Coordination Update: I want to compliment the energy going forward and the cooperation between Donna and Curtis. I hope to have this done by the end of the year. I commend you.	Comment received	
2					11/4/2020	Norm Groot	Wondering if determination is made, and an agreement is set on the management area, does SGMA require the parcels to approve that? Or can the GSAs approve it?	Donna Meyer: We do intend to do outreach with property owners once we have a boundary proposal. All the parcels will be within the one GSP (Forebay), but we will have those conversations with stakeholders and property owners. Curtis Weeks: We want to take this to the public once we have a technically sound determination behind it. Les: There is no SGMA requirement for a property owner vote on this, but outreach and consensus is encouraged.	
3					11/4/2020	Steve McIntyre	Re: Deep Aquifer: Is it not a separate aquifer because there aren't any aquitards separating?	DW: Not necessarily. We just don't have the data right now to say the deeper portions are separate from the shallower portions. We are waiting for the Deep Aquifer Study.	
4					11/4/2020	Allen Panziera	You don't have conclusive evidence it's interconnected with the 180/400, either way?	DW: yes, we're saying there is no conclusive evidence either way.	
5					11/4/2020	Amy Woodrow	I'm with WRA, I want to let everyone know on November 16 WRA BOD meeting, there will be a deep aquifer presentation.	Comment received	
6					11/4/2020	Tom Virsik	Ms. Woodrow said what I was going to say. Talk to the agency people, they will be the authority.	Comment received	
7					11/4/2020	J Sang	You mentioned there were several wells in this area. At the time they were dug, did they go down to 800 ft? Into the deep aquifer?	DW: This information was from the well logs, and they were drilled at least 800 ft deep. They don't say on the well log, "deep aquifer."	
8					11/4/2020	J Sang	I'm interested in recharging our aquifers so we can have a sustainable aquifer, anywhere in the valley really.	DW: In the Forebay, the single aquifer is largely recharged from precipitation and river flows. The question remains about how long or how it gets to the deepest parts of the basin, changes as you go south or north. This question will be answered by the Deep Aquifer Study.	
9					11/4/2020	J Sang	Can I assume that if we were able to catch the precipitation in one year, that we could get it to percolate into the groundwater and then into the underground aquifers in the 180/400?	DW: If we could capture more precipitation, yes, we could, but it's very difficult to do. For the 180/400 subbasin, even if we could capture precipitation, it would be hard to get into the 180/400 due to the aquitards in the way. It's a different subbasin.	
10					11/4/2020	Justine Massey	There is a summary of constituents of concern. What is the process for identifying the constituents of concern. Were Chromium 6 and arsenic tested for?	DW: We looked at publicly available data from Division of Drinking water wells, since they are sampled for title 22 suite, including Chromium. Some wells were from ILRP, so we could only assess what they analyze for, which is a smaller set of constituents.	
11					11/4/2020	Justine Massey	I would identify that as a point to improve data collection in the future. It's important for this committee and the GSA to have all the information possible to manage the subbasin. Constituents of concern like that can have negative effects. We recommend more mapping of those constituents. I see mapping of Nitrate. Mapping for other constituents would help prevent undesirable results. We encourage even more trends and mapping with data from state small water systems, local water systems, public systems, and private wells.	Comment received	

Number	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
12					11/4/2020	Norm Groot	As you may know, I'm participating on the Deep Aquifer working group. That groups has been discussing the study and the need to get it done. The problem is we have not identified a funding source. It will probably take a year or more. The county is not willing to fund it, so it will require grants or another funding source. There is a survey out which includes how to fund the study. I urge you all to complete the survey Gary Peterson created. We really need your input on this.	Comment received	
13					11/4/2020	Justine Massey	I want to reiterate what Community Water Center has said in the past. Monitoring networks must include shallow well monitoring to establish baseline conditions in quality and groundwater elevation that effects domestic users. We find this to be critical, and encourage a robust shallow well monitoring program. I would be happy to provide more information how that connects to our DW well mitigation framework.	Comment received	
14					11/4/2020	J Sang	On the monitoring of the water level, how is it done and where is it done?	DW: There is a map in Chapter 7, it's done quite a few wells in the Forebay, which will be reported regularly. There is a map. Monitoring is conducted by MCWRA and private well owners. We receive the data and report to DWR.	
15					11/4/2020	Jerry Lohr	Re: Management are memo: I thought it was quite complete and the process is working well.	Comment received	
16					11/4/2020	Steve McIntyre and Jerry Lohr	Re: SMC Presentation/Discussion/Groundwater Storage/MT and MO: I think this approach is appropriate.	Comment received	
17					11/4/2020	Justine Massey	I want to follow up on the 21% of domestic wells potentially being impacted. If the impact is in that range, is there a plan in the works about how to mitigate those impacts? How does the committee respond if that is the case?	<p>Steve McIntyre: We're going to get better data as we go along. I would expect the domestic wells to have been impacted by the 2015 drought more than the ag wells, since they are so much shallower. I think there is a way to monitor and find a standard that is more appropriate.</p> <p>Abby Ostovar: We're going to talk about projects and management actions a little later. I think the wells that went dry was very low, suspiciously low, close to zero, which is why we expanded our analysis.</p> <p>Steve McIntyre: I would add from 2015, I don't know of any domestic wells that went dry on our ranches or our neighboring ranches. 2015 was an extreme situation for all of us.</p>	
18					11/4/2020	Gus Yates	I want to clarify about ASGSA consultant not liking this. By using pumping as a storage surrogate, it's assuming that storage decline is a result of pumping. In this basin, the storage decline during the last drought was a result of an interuption of surface flow and a decrease in recharge, not from an increase in pumping. Both decreases in recharge and increases in pumping both effect storage.	<p>Steve McIntyre: That's a really good point. As a management action, if we reoperate the reservoirs, we could have prevented that.</p> <p>DW: I want to disagree with Mr. Yates. I think that he overstates it to say that the lowered water levels were from lack of streamflow. Lack of streamflow was important, but you could also have cut back on pumping to maintain storage. You need both recharge and to control our pumping. In the thresholds we're writing, we agreed the storage threshold based on GW levels is reasonable. We also said that we need to pump within our sustainable yield. It's not one or the other, it's both. It's both recharge and controlled pumping.</p>	
19					11/4/2020	Jerry Lohr	It's important to point out the drought years as well as the operation of the reservoirs.	Comment received	

Number	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
20					11/4/2020	Justine Massey	Two reports came out, one from the Water Foundation that found similar results that the GSP plans that came for 2020 will result in up to 12,000 wells going dry and thousands of CA residents losing access to their DW. I would be happy to forward that information along. It is a very real possibility that these SMC MT are being prepared in a way that will not protect domestic users. I understand process-wise, you've separated SMCs and projects. You don't want to set yourself up for a giant gap that will cause drastic problems.	Steve McIntyre: I really appreciate that. I appreciate the opportunity to speak with you, and maybe a group of us can chat with you about these studies and how they might relate to this subbasin.	
21					11/4/2020	Jerry Lohr	In ISW data gaps (7.6.2), it says the level of interconnection basin fill aquifer and the Arroyo Seco aquifer is unclear. That is something we need to be cognizant of going forward.	Comment received	
22					11/4/2020	Jerry Lohr	Re: Subsidence SMC. I think it would be good to have 1ft cumulative.	Comment received	
23					11/4/2020	Allen Panziera	I would agree to 1 ft cumulative.	Comment received	
24					11/4/2020	Steve McIntyre	I would agree to that, too.	DW: If you have a rate for one metric, you need to have a rate for the other, too. You can't have a rate for one metric and cumulative for the other. Trying to make it easy on us for DWR to approve our plan.	
25					11/4/2020	Colby Pereria	Based on what DW said, I would lean toward that recommendation, using a rate.	Comment received	
26					11/4/2020	Steve McIntyre	Re: Water Quality: At the last coordinating committee meeting, we talked a lot about this topic. There are other efforts outside of SGMA looking at water quality, like the irrigated lands program. Our primary goal is to work on salt water intrusion and the quantity of water to achieve sustainability. I think we need to spend more time on water quality and be more proactive. Farmers are concerned about salt build ups. City of Greenfield, we might need to look at water softeners and maybe change them out so we aren't adding to our salt load. I think we need to spend more time on this.	Comment received	
27					11/4/2020	Justine Massey	At Community Water Center, we feel that it's important that the MT and MO to be set at each well. If you just average across the subbasin, you can harm the users within the basin. If someone's well is no longer functioning and they can't rely on it, it doesn't matter to them that on average the subbasin is in compliance. It's detrimental to them. The standards should say each well will be protected.		
28					11/4/2020	Steve McIntyre	If we're going to have shallow wells for ISW, maybe we could use those shallow wells for water quality monitoring as well.	Abby Ostovar: One question would be spatial representation. The shallow wells for ISW will be concentrated along the river. DW: Water quality is based on supply wells. So we need to analyze what supply wells we can use in our monitoring system, and the shallow ones would be the domestic ones.	
29					11/4/2020	Jerry Lohr	Re: Projects Discussion: Other projects: 11043, are we not including those?	Abby Ostovar: Those are part of a valley-wide program. I tried to focus on what would benefit this subbasin specifically.	

Number	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
30					11/4/2020	John Bramers	Re: winter releases, can SRDF operate in winter months?	<p>Abby Ostovar: Technically it can operate, we're working with WRA about permitting.</p> <p>DW: During the 180/400 GSP discussions, our engineer asked MCWRA about this. MCWRA said it could. Usually water levels are high enough to raise the rubber dam. You could also operate the diversion without the rubber dam. We went forward assuming we could operate it in the winter.</p>	
31					11/4/2020	John Bramers	We would have to expand the CSIP and do a lot of things to actually capture the water and use it.	<p>DW: Yes, it is part of a bigger project.</p> <p>Donna Meyer: One qualifier is that they have a flow prescription they have to operate to for winter flows for fish passage. There is a prescription that is tied that physical possibility as well.</p>	
32					11/4/2020	J Sang	I don't like the idea of any kind of project that inhibits a grower. I look at this, in the long term, you have growth of ag product and growth of population. Both mean you have to have increased water. If a grower can't use his land, or you charge him for using the GW, I don't see this as a sustainable strategy for the long term. I think you need to recharge the wells themselves, and recharge the underground aquifers. I don't know if it's possible for each grower to develop ponds on his land, or what the health department would say about that. I think you need to recharge the wells. Start with a shallower well, 100 ft deep, and put in swales, and my plan would be to put these swales all around the shallow well. After 15 inches of rain in a year, can these swales catch enough water for the shallow well, and see if that raises the GW level. If we see a pattern of drying in the future, I don't see how you can limit water use.	<p>Steve McIntyre: I would encourage you to submit your comments in written form so we can include that later.</p> <p>Abby Ostovar: The swales are something that could fall under the ag BMPs. I was also building on a past presentation and a large part of the reservoir reoperation is for recharge, which will get water into the ground. Recharge is a main focus of that project.</p>	
33					11/4/2020	Norm Groot	I just want to mention that we have conflicting objectives between agencies controlling our GW at this point. The ILRP that is currently being proposed is going to discourage the percolation of irrigation water into GW. If we design projects to enhance groundwater recharge, we need to make sure we aren't getting crosswise of the ILRP program. As it stands now, the regional water board does not want irrigation water below the root zone and we should be aware of that as we move forward with projects.	Comment received	
34					11/4/2020	Gus Yates	Does the inclusion of various mechanisms for reducing pumping mean we assume pumping needs to be reduced? Or is it a back stop?	Abby Ostovar: It's a back stop. We want to think about the approach if we need it.	
35					11/4/2020	Tom Virsik	I had comments on draft chapter 8. I assume it will be in a future meeting. Since there is so much red in it, I'm not sure if staff are ready to receive comments. There are some issues with water rights, I can submit my comments in writing. I'm not sure if staff are ready for substantive comments.	<p>Emily Gardner: I would encourage you to submit comments. The draft chapter was included in the agenda packet, but it is a work in progress. We want to get as much feedback as possible. We have not been issuing multiple versions, but this is an exception for more feedback. Another draft chapter 8 will be coming in January or February.</p> <p>DW: If we have language concerns, especially with water rights. We want those comments now.</p>	