

COMMENTS RECEIVED DECEMBER 30, 2020 to FEBRUARY 22, 2021

Number	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
1					1/6/2021	James Sang	Based on your report, it looks like the great majority of Prunedale has enough water. I think there's only part toward the south you should be worried about because it's been losing water and that seems to be related to the agricultural land there. We could suggest to the farmers to put swales or trenches on an acre or two of land to recharge the well. Swales, if dug deep enough (at least a few feet down), prevent evaporation from the sun and wind. Trenches don't offer that same protection. I don't like the idea of dry wells, because it's like a tube that goes straight down to the water table. The dry well, except for the petrochemical sponge that you have, doesn't prevent nitrates, phosphates and oil chemicals, heavy metals from going down into the drinking water. Dry wells are expensive. Instead, just dig some shallow (few feet deep) swales and trenches. Plants will grow back with time, providing bioremediation. Build trenches or swales underneath the eucalyptus trees. It looks like the trees are drying out. The reason I'm trying to save these trees is they're a great source of evapotranspiration. The water they release into the air creates moisture needed for rainfall. Swales or trenches or terraces – anything that – will capture moisture on these hills and with fire prevention too.	Comment received	
2					1/6/2021	James Sang	Last week or the week before, you shared the idea of putting together the dry wells and retention ponds. Even though I think swales are better, I think that grouping dry wells and retention ponds is a good idea, because retention ponds allow for some green growth that would provide some protection against groundwater contamination via the dry wells.  Also, regarding Robin Lee's comment about cisterns, I did some calculations. I looked it up on the internet. If you have a 5,000 gallon water tank and you put it next to a house and you run your rain gutter to it. With 15 inches of rain, you can capture 9,000 gallons of water per year, which is probably plenty for most families.	Comment received.	
3					1/6/2021	Tom Adcock	Any pumping allocations structure would be limited to farmers who pump more than 1 acre-feet per year. Is that correct?	<b>Abby Ostovar:</b> A de minimis user is defined as using less than 2 AFY. We're not allowed to meter their pumping, but under SGMA we could regulate them and include them in a pumping allocation structure. That is our current understanding.	
4					1/6/2021	Tom Adcock	Okay, because in Langley we have a significant number of houses that use less than that. I'm worried that a lot of people are going to drill their own wells as a way around having to conserve water. You're going to get a lot of that, I suspect.	Comment received.	
5					1/6/2021	Grant Leonard	I'm wondering if pumping controls could lead to something similar to Monterey Peninsula, where there is a tightly regulated system. Those extreme water restrictions are limiting growth. For de minimis users, does that term apply to shared well systems as well?	<b>Abby Ostovar:</b> Monterey Peninsula is under cease and desist order due to CalAm's pumping and that is limiting growth. A pumping allocation structure could limit growth, but it doesn't have to. It depends on how you structure it. <b>DW:</b> Re shared well systems: I think we talked about this earlier as a "per well" system. If the well is pumping enough to supply more than 2 acre-feet per year, then it's no longer de minimis. <b>Abby Ostovar:</b> For now, I think for the purposes of this conversation, consider de minimis users as individual well owners and one household.	
6					1/6/2021	Tom Adcock	Even without pumping allocations limiting use, we could use it for funding. What other options are there for funding?	<b>Abby Ostovar:</b> Yes, there are other options. We'll talk about those more during the funding workshop. We don't have to reach a decision now.	
7					1/6/2021	Caroline Chapin	The thing I'm struggling with about pumping allocations is that some parts of the basins are in overdraft while others are not, so a flat pumping allocation doesn't seem right.	<b>Abby Ostovar:</b> We are looking at comparisons between years looking at how storage has changed, trying to get a better sense of where those conditions exist. <b>Derrick Williams:</b> There's not necessarily a 1:1 correlation between, "this is the allocation," and, "everyone has to cut back equally." If it's just one pumper who is preventing sustainability, everyone has an allocation, but there is a potential that a pumper cannot implement their allocation because they are preventing sustainability. <b>Abby Ostovar:</b> To build on what Derrick is saying, if an individual pumper is preventing you from meeting a sustainability goal – be it seawater intrusion, or chronic lowering of groundwater levels, or something else – that could be as much a fault of the pumper's location as it is their water use.	

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8					1/6/2021	James Sang	This is one issue that I really hate about this program, because I understand that we have a problem with overdraft, but I don't want to limit growth. I don't think growth can be stopped. If you set limitations on the amount of water that can be used, you're going to stop new ag growth. I don't want to stop that because it helps the economy of this area. Maybe you can [distribute allocations] on a per well basis. You can find out what the level of the water is and whether it goes up or down, then you can charge them or not. In the northern part of the basin, I see that there is no problem right now. For new communities, I think they should consider where the water supply is going to come from and know how they're going to replenish that source of water. You mentioned \$1600 per AF. We could use numbers like that to scare people into action (swales to collect rainwater, for example, or add a water tank), but I think that, at some point, if you really focus on the supply side, that's the way to go. Punishing people for using too much water isn't going to work.	Comment received	
9					1/6/2021	Caroline Chapin	I feel like there has to be some kind of hybrid approach because we have so many different types of users.	Comment received.	
10					1/6/2021	Tom Adcock	Let's say agriculture gets 30%, then we divide that by the acreage? And say municipal gets 30%, then divide that by the number of connections? Is that how it would be separated?	<b>Abby Ostovar:</b> You have to look at what is there across categories of users. You can do a per acre fee and then figure out what percentage of the pie that represents.	
11					1/6/2021	Caroline Chapin	We have to consider future municipal growth. Butterfly Village could be huge. I think we have to consider it.	Comment received.	
12					1/6/2021	Tom Adcock	Some of the growth of municipal water systems was connecting existing homes that lost their wells. We might need a better way of accounting for de minimis users that are transferred to municipal systems.	Comment received.	
13					1/6/2021	Tom Adcock	Due the General Plan, we can assume that homeowners cannot subdivide existing lots, but ADUs could almost double water use on some lots.	<b>Abby Ostovar:</b> Right, and if you build an ADU, does it get its own connection or is it shared? We can account for them in whatever "set aside" there is. While there is a "set aside" before they've taken their portion of the pie, that reduces what they can take. Do we also want a "set aside" for dormant users?	
14					1/6/2021	Tom Adcock	There's a decent amount of land in Langley that will probably be developed eventually, at low density at least.	Comment received.	
15					1/6/2021	Tom Adcock	Speaking as a water provider, per household and per water user is impossible. Not everyone can be relied on to accurately self-report and we can't go door to door. It's a lost cause. I'm guessing we have little to no production data for these smaller systems. If we found a few systems with really good data, then you could build a model from the limited data that you have.	Comment received.	
16					1/6/2021	Caroline Chapin	If we feel that there are holes in our historical data, then per connection seems fair to me.	Comment received	
17					1/6/2021	Tom Adcock	There are some areas where they probably have some golf course lawns on large lots and then smaller lots where there's less landscaping irrigation.	<b>Abby Ostovar:</b> Since these are all overlies, we could do net acreage for lots greater than 1 acre, for example, and per connection for smaller lots. Combines per connection with acreage.	
18					1/6/2021	Tom Adcock	I'm trying to wrap my head around the de minimis users because there are a lot of individual wells in Langley Area. For individual wells, you'd still be basing their allocation on the acreage of the lot? Or would they just be considered de minimis? Relative to other subbasins, I think Langley's de minimis users account for a much larger share of overall water use.	<b>Abby Ostovar:</b> We might need legal advice on that. <b>DW:</b> Agreed.	
19					1/6/2021	Grant Leonard	On the ADU questions, I'm a housing professional. Currently, every single family home is allowed to add an ADU. That's probably the main source of growth in this area. Land use makes a big difference to water use on larger 1-acre to 5-acre parcels. I like the use of a hybrid approach. Using historic usage for farms where we have good data, but for individual residential lots, per connection is probably better. Re: ADUs and how the connection is classified, they vary by jurisdiction	Comment received.	
20					1/6/2021	Tom Adcock	If the ADU has fire sprinklers, then it definitely has a separate connection. Here in Salinas, they're all required to have separate connections. In Prunedale, they might just go with least expensive way to connect, but it would depend on what was required.	Comment received.	

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21					1/6/2021	Tom Adcock	Derrick, do we have to show the state that there will be some pumping allocations?	<p><b>DW:</b> No, there is no requirement for pumping allocations. Allocations are a fundamental idea, though. There was a study that showed there were many GSPs that did not require demand style management and the study thought that was a mistake because there are only two knobs: increase supply and limit demand. So, pumping allocations are not required, but they are useful.</p> <p><b>Abby Ostovar:</b> Another thing that has come up is whether all options should be presented as equally likely to be implemented. Some GSPs show tiered options: first choice, second choice..., last resort.</p>	
22					1/6/2021	Tom Adcock	As a water system during the drought, I didn't have the authority to shut people off if I thought they were using too much. Instead, we had to charge people more – essentially a surcharge. It does work. It will cause people to use less water. So probably some type of pumping allocations will be necessary.	Comment received	
23					1/6/2021	Caroline Chapin	I'm not opposed to exploring the idea of a tool that can be used. Should we use this as a tool, I think we want to treat overlying users differently and leave room for future growth.	We cannot treat overlayers differently since they are one category. However, since we have both ag and domestic, we can use one method overall with different metrics depending on acreage or connections.	
24					1/6/2021	Tom Adcock	I'm still worried about de minimis users. We have to factor them in.		
25					1/6/2021	Caroline Chapin	I think we should exempt de minimis users completely. Drilling a well is so expensive. I would be shocked if the average single-family home could afford to drill a well.		
26					1/6/2021	Tom Adcock	When we come up with the total water budget, we allocate a certain amount for de minimis users?	<b>Abby Ostovar:</b> We still want to account for all water, so I think we should estimate the total use by all de minimis users and set that much aside in our water budget.	
27					1/6/2021	Caroline Chapin	How many de minimis users are there? Approximately what is their usage?	<p><b>Abby Ostovar:</b> It's hard to know exactly. One method to estimate the number is just to count the number of houses, but we are exploring some other methods also.</p> <p><b>Emiy Gardner:</b> Well registrations could help us count de minimis users in the future, if you want to go that direction.</p>	
28					1/6/2021	Grant Leonard	I agree with Derrick that this is a good idea to develop for our "back pocket" and we should establish an allocation system. What is the administrative process? It seems like it would be a headache to hold people to these limitations. Do we plan to grow the GSA to monitoring this? Or will it be recommendation?	<p><b>Abby Ostovar:</b> Part of this depends on what you use this for and whether we're in overdraft. If you are using it for financing and not reductions, then that's one thing. If you are doing reductions, then that's another thing.</p> <p><b>Emily Gardner:</b> This is the beginning of the conversation. We're asking some of the fundamental questions today, but it could take a year or more to decide how we would administer this.</p> <p><b>Gary Peterson:</b> It is not our intention to grow the GSA to a large size to monitor all of the wells. We have been primarily a planning organization. What we are talking about here is implementation and we don't have answers about what that looks like yet.</p> <p><b>Donna Meyers:</b> Should the subbasin plans include an allocation program, we would have a full public process. We would need to understand the needs, legal requirements and would be developed in full transparency working with our Board and Advisory Committee.</p>	
29					1/28/2021	James Sang	<a href="https://sjvwater.org/delanos-big-dig/">https://sjvwater.org/delanos-big-dig/</a>	Comment received	