

Number	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
1					1/7/2021	Sarah Hardgrave	Are you going to develop a long-term sustainable yield for the two management areas or for the subbasin as a whole?	Abby Ostovar: We have to calculate overdraft as a subbasin, but still need to discuss with MCWD. If only for informational purposes, we will do this for each management area, but we haven't discussed how this all works yet. Have to check what's in the regs, what we can do legally and well as what we want to do. For this conversation, focused on the corral de tierra area. I'm not asking you to make decisions today, this is just to inform you and get you thinking. This is an intermediary step.	
2					1/7/2021	Sarah Hardgrave	It seems like allocations are more easily applied in areas where there are more ag/irrigation users, and not as easily in areas that are predominantly rural and residential areas. Are the Cal-Water and Cal-Am in the Corral area service systems considered municipal systems?	Abby Ostovar: I'm pretty sure, I'll check on it. They would be different than mutual water systems, not overlies.	
3					1/7/2021	Janet Brennan	I think addressing this issue depends on if a pumping allocation system can even be implemented in this area. It seems that a large portion of the water users are beyond the regulatory process.	Abby Ostovar: We can regulate de minimis users. You can regulate them, you just can't meter them. Tricky because you don't know what they are actually pumping.	
4					1/7/2021	Janet Brennan	How do you know they're meeting their allocation?	Abby Ostovar: If there was a connection basis, you could have a set amount per connection. Say you have 1000 AFY and you have 500 connections, and 100 are de minimis users. You could count them as connections and that would be their slice of the pie. It's an approximation.	
5					1/7/2021	Janet Brennan	I guess the question in terms of percentage of users, what percentage are de minimis, what percentage are overlies?	Abby Ostovar: I don't have the percentages here. Do you want to treat municipal systems different than mutual water systems? You can, you don't have to.	
6					1/7/2021	Janet Brennan	Why would you differentiate?	Abby Ostovar: The categories the state uses are overlies and non-overlies. But mutual and municipal are both for domestic use.	
7					1/7/2021	Sarah Hardgrave	It seems that the municipal systems, the Cal-Water service and Cal-Am are serving neighborhoods or developments that are more akin to a medium density residential area, whereas the mutual water systems may serve larger lot property owners. I'm not sure you could treat them equally. Those larger lot owners may have horses, or a small vineyard on their property that may account for more water use. I think that's something we need to consider. In the B8 Zone, the recently adopted county regs for accessory dwelling units do not allow ADUs within the B8 Zone area. So that is not a consideration for future demand, within that B8 portion of the management area. Not all of the management area is in the B8 Zone. In the B8 zone, there's no further subdivision according to the zoning. I don't know how much subdivision potential there is outside of the Zone, but I think it's probably limited. I recommend looking at the county land use plan for the Toro area for an indication of potential growth to use for the calculation of a set aside. I don't think it will be a substantial amount.	Comment received.	
8					1/7/2021	Beverly Bean	Question about the difference between municipal as those being served by Cal-Am or Toro water, compared to the mutual systems formed from residential users. Water source. Mutual water systems pump from wells close to their properties. Where are the wells used by Toro and Cal-Am?	Abby Ostovar: We know where some of the wells are. As far as overlying rights, the mutual water systems' wells are right there, and they can't move that water. We can look at how far away the wells are of the municipal water systems. My guess is that it isn't that far, so it won't make that much of a difference.	
9					1/7/2021	Beverly Bean	You believe they're all within the Corral de Tierra subbasin?	Abby Ostovar: I believe so. We will look at those along the edge.	
10					1/7/2021	Jon Lear	I just want to say as far as Cal-Am pumping in this area and pumping in the Laguna Seca area, there is going to be a change in the Laguna Seca area because the most recent general rate case has CalAm building an intertie to their main system, so there will be an overall reduction in the Laguna Seca area. The corral de tierra area, still plan to have that area pumped. No plan to tie-in to larger system.	Comment received.	

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11					1/7/2021	James Sang	I wanted to know exactly how it is being determined you're in overdraft. Are you going to different wells and just judging by how far you reach the water? And in the future, if you're able to get enough progress to bring the water level up, how does that affect the pumping allocation? Last November, we discussed some projects but they didn't seem to really be able to increase the GW supply. I think there are other projects that can be recommended. In Langley, they recommended rooftop water harvesting. I think that's good for anyone that's on a well to reduce their pumping. There are some people who have 5,000 gal tanks. On a 15inch rainfall year on a 1,000 sq ft roof, you can get 9,000 gal. I think it's possible to harvest rainwater and get it into the GW but using the slopes. You could do it by trenching the surface of the hills to collect more of the rainwater, and prevent it from being evaporated and allow it to sink into the soil in the hill and allow it to sink into the ground. How do you determine overdraft?	Abby Ostovar: We use a groundwater model. We're actively working on it. They're very complex models, you have to take in the stratigraphy and climate. We're working on it. We're hoping to have a budget for you soon. For recharge projects, if you put more in the ground, you can take more out. However, there are not great recharge options in this area. There isn't a steady supply of surface water in the area. We're working on scoping a larger recharge project. We've looked at scoping decentralized rainwater harvesting. It will be very challenging to meet the sustainable yield just with those types of projects. There are over 300,000 gal in an AF. The amount you collect on an individual house may help that house, but getting enough homeowners to participate is a very challenging task. We want to pursue it, but we have to look at the numbers to see if we can meet sustainable yield. For a larger recharge project, there is also the question about how to pay for it. Pumping allocations, even if not used for reductions in pumping, could be a way to allocate the financing structure to pay for these kinds of projects.	
12					1/7/2021	Sarah Hardgrave	Given land use in the area, and the residential areas, has there been much fluctuation in pumping over time, or has it been fairly consistent?	Abby Ostovar: One of my staff has looked more at this, but it only goes back to 2013.	
13					1/7/2021	Beverly Bean	I would say the majority of development has happened in the last 50 years or less. I've been here for the last 40 years, and growth was unchecked from the 70s and 80s on, and with the flimsiest ideas of where the water would come from. Historically speaking, I don't know what time frame you're talking about. The growth since the 60's and 70's has been steady. The number of people living here has steadily increased. The groundwater levels are steadily decreasing.	Abby Ostovar: We don't have data for water systems prior to 2013. We could take an average between 2013 and 2018 but that includes a drought. For individual households, we don't have that data, but we could look at the number of households.	
14					1/7/2021	Janet Brennan	If you use historical pumping as the basis of an allocation system, historical pumping has created the problem. So is it historical pumping minus a percentage?	Abby Ostovar: The historical pumping would basically say, 2013-2018, average water use sets up the pie. Your sustainable yield determines the size of the pie. Could be smaller. It just sets the basis for the overall allocation.	
15					1/7/2021	Janet Brennan	Historical pumping seems to be a fair way to allocate water use. I mean, it reflects actual use for all systems, except for de minimis.	Abby Ostovar: The argument against historical is that it rewards those who have caused the problem.	
16					1/7/2021	Janet Brennan	If you have an allocation based on historical use, how does it increase water use?	Abby Ostovar: If you have 2 neighbors, and one has been pumping and irrigate all their land, and the other hasn't, how much they've been pumping determines how much they use in the future. The one who has pumped a lot can continue to pump, and the one who has conserved cannot.  Emily Gardner: It would have to be changed proportionally.  Abby Ostovar: Right, if you've always used less, you will always use less.	
17					1/7/2021	Beverly Bean	In terms of this historical pumping, if you've caused problems in the past, why should you be allowed to continue that? In my mutual system, we have an allocation of basic use of 30,000 gal per quarter per household. If you go over that, you are punished by a severely higher rate. Maybe those kinds of numbers are the way you need to look at this. If you go by household, what's a reasonable number and if you go over that, you have exceeded your allocation.	Abby Ostovar: There are two more options, by household/building structure or connections. Net acreage would be another one. Sarah mentioned that some people have other uses, like horses. How do you deal with that in your mutual water company?	
18					1/7/2021	Beverly Bean	Having horses is a choice. If you can do it within your allocation, you can do it. The problem is with affluent people, I'm not sure the cost is a deterrent. We don't make special circumstances for what people do on their property. If you use more you pay more. I'm not sure that is a sufficient deterrent.	Comment received.	
19					1/7/2021	Janet Brennan	Could have allocation based on households plus acreage, a hybrid, to account for people who have horses.	Abby Ostovar: It's a fair point that there are other uses than just domestic use.	
20					1/7/2021	Sarah Hardgrave	Some people have swimming pools and other household activities.	Abby Ostovar: The question is "what's fair", does each household get the same? Should allocation be based on acreage and use?	

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21					1/7/2021	Sarah Hardgrave	If you fly over this area, there is a quite a bit of variation in size of houses. There's probably some houses over 10,000 ft^2 and other houses that are 2,000 ft^2. That's a challenge in this area to consider. I think that's where a hybrid that considers the lot size might be appropriate.	Abby Ostovar: Would you weigh those equally?	
22					1/7/2021	Sarah Hardgrave	I feel we don't have enough information to weigh in at this point. It would take some better understanding from the land use perspective to propose a hybrid.	Abby Ostovar: If you're in overdraft, this will be one of the ways to meet sustainability. Post GSP there will be more of a process, more stakeholder discussions. Here, this is the foundation.  The more input we have now, the better we can come back. When it comes to overlies vs non overlies, should those have a similar metric and allocation or should we have something distinct for those?	
23					1/7/2021	Janet Brennan	I'm not sure why we would want to differentiate between municipal systems and overlies. We should use the same approach for both.	Comment received.	
24					1/7/2021	Sarah Hardgrave	I would agree with you, Janet, because the areas served by Municipal systems, Toro Park, Las Palmas, those are more suburban density neighborhoods, so if you're using some sort of lot size or acreage, that would be reflected. Or those areas would be more likely to have the 0.4 AF household usage versus someone higher up in corral who has a 10-acre property.	Comment received.	
25					1/7/2021	James Sang	On this issue, what this program is dealing with is if you're getting in overdraft or not. If Cal-Am or Cal-Water has their water source far away, I don't think they should be included unless their source of water is connected to this aquifer.	Sarah Hardgrave: These are satellite systems that are operated by these two utilities that draw their supply in this system. They are neighborhood scale systems that have the source of supply in area.	
26					1/7/2021	Beverly Bean	These dormant overlies, if these are what we call legal lots of record, aren't they entitled to water? We're just counting them in so we can make a water budget?	Abby Ostovar: Theoretically, you can just say they don't get any. She cautioned against that. Either you account for them when they start using, or you set aside part of the pie.	
27					1/7/2021	Beverly Bean	Are these legal lots of record? Simple enough to find out who they are and how many there are.	Comment received.	
28					1/7/2021	Sarah Hardgrave	I agree, from the county's land use perspective, there would be a significant issue if legal lot of record were not accounted for in the budget.	Comment received.	
29					1/7/2021	Sarah Hardgrave	Re: Municipal growth: I think that would be pretty easy to quantify because the potential for that kind of growth is limited for this area. Different question for Marina area and former ft ord.	Comment received.	
30					1/7/2021	Janet Brennan	All I can say is best of luck getting legal lots of record from the county. The county always punts and says it's too detailed. It's crazy. It's not going to be easy Sarah, to find these legal lots in the Toro area. Nobody knows how many legal lots of record there are for the county. Maybe looking at the land use plan and getting a sense for how much development could occur may be the best way.	Comment received.	
31					1/7/2021	Sarah Hardgrave	Did the general plan, 2010 EIR quantify this in any way?	Janet Brennan: No. For example, in Carmel Valley the number of legal lots of record has ranged from 500 to 250 over time, depends on who you're talking to. I don't think we can ask them to get a feel for vacant parcel that could be developed. That's probably the best question rather than legal lots of record which is a more detailed analysis.	
32					1/7/2021	Sarah Hardgrave	Seems like you could look at assessors code for vacant property. But it's an imperfect number. I don't know how into the weeds the GSP needs to get. I do think it would be important to have some general estimate for making sure the potential is accounted for within a sustainable yield allocation. In terms of substantial municipal growth in this area, there's not a lot of room for it. The one major subdivision that was proposed has gone into a conservation easement.	Comment received.	
33					1/7/2021	Beverly Bean	I would like to say a de minimis user could have a large estate property and use a large amount of water. They have their own wells for the property.	Abby Ostovar: De minimis is defined as those using less than 2 AFY. You have to somehow determine how much they're using.	
34					1/7/2021	Beverly Bean	How do you ask them or determine that?	Abby Ostovar: For a 0.4 AFY, that's 5 households under 2 AFY.	

Number	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
35					1/7/2021	Beverly Bean	Some have vineyards or pools, I can imagine they're using that much water if they are growing grapes. If you can't meter them, how can you know anything?	<b>Abby Ostovar:</b> You could do an estimate to include them in it. You can still do net acreage. <b>DW:</b> It's a difficult question. Self-certification, and then they have to demonstrate they are de minimis. None of the approaches are perfect. No matter what decision we make, we're going to have to draw a line. And if people have issue, they will have to prove it.	
36					1/7/2021	Sarah Hardgrave	I think it would be helpful if you can bring back alternative proposals that include/exclude [de minimis users] based on your further investigations. If we're using some sort of acreage factor, that should be considered in a hybrid approach.	Comment received.	
37					1/7/2021	James Sang	I think de minimis users should be included, and dormant users should not. If they don't have a well and they're not extracting water from the aquifer. If people are drawing water from the aquifer, they should be charged. If they are not, they should not be charged.	<b>Sarah Hardgrave:</b> There's the question of the allocation amount, and the question of what you do with it. That's a future discussion. <b>Abby Ostovar:</b> Typically dormant users are not charged, even if there's space in the pie for them, if they're not using.	
38					1/7/2021	Janet Brennan	Re: Prioritization of pumping controls: Our response depends on what alternatives we're looking at. If there are projects that will increase supply and are cost effective, our answer will be different than just out of the blue. We need more data.	<b>Abby Ostovar:</b> We're working on that.	
39					1/7/2021	Sarah Hardgrave	I would concur with Janet. It seems like our supply projects are really limited in opportunity. It's hard to answer that question without understanding what those options might be.	<b>Abby Ostovar:</b> I'm hoping next time, these parts will come together. We'll try to come up with some kind of proposal or some kind of allocation structure based on this conversation.	
40					1/7/2021	Janet Brennan	What I got out of it is that the data from the Stanford study (AEM) and the Marina Coast area, there was no inconsistency with that data and MCWRA data. Did I read that correctly? My understanding is that there is a lot of conflict with this data and County resources.	<b>Abby Ostovar:</b> The AEM data informs how we understand the basin. I don't know how it conflicts with MCWRA data. <b>DW:</b> I think the consensus is that AEM data generally supports the conceptual model. People have noted there are specific areas where there are some discrepancies. Your concern is about discrepancies?	
41					1/7/2021	Tina Wang	Re: Discrepancies between Stanford and county data. Our plan has said that in the lower 180 and 400- aquifer, which is currently SWI intruded, the AEM data is consistent with the MCWRA chloride maps. There is one thing we pointed out in that chapter, is the dune sand aquifer and the upper 180 foot aq is not SWI intruded, it is fresh. That's a slight difference with the data published by the county. It does not distinguish the specific conditions in our subbasin that is separated into the upper 180 that isn't intruded and the lower 180 that is intruded.	Comment received.	
42					1/7/2021	Tamara Voss	Re: Discrepancies between Stanford and county data. Number 1, the agency does not collect data in the Dune Sand Aq. We also don't break down the 180-foot aq into an upper and a lower. This report seems to group the lower with the 400, instead of with the upper 180. We'll have to have further discussion. I'd want to further understand what EKI defines as fresh water, before I would say the upper 180 is not intruded near the coast. It would be helpful to define the geographic extent where the consultant is defining freshwater.	Comment received.	
43					1/7/2021	Sarah Hardgrave	In follow-up to this, I would like to suggest inviting Tamara to one of your TAC meetings to further explore these questions. Seems there is a need for further technical discussions in order to address Janet's question about the discrepancies.	Comment received.	
44					1/7/2021	Bob Jaques	With regard to the AEM data, if I recall correctly, in conjunction with CalAm's slant well desalination planning and EIR process, I think the county convened a blue ribbon panel of hydrologists to review. I believe they evaluated the AEM data and rendered their opinions. They had some concerns about how valid that data was. One of my comments in regard to chapter 5 would be that there should be some language in the document that reports on what that panel's findings were regarding the AEM data. They had some concerns about that data being used.	<b>DW:</b> We have discussed the AEM data with some members of the blue ribbon panel. We did talk to some members, they didn't have too many concerns. I will look at some of the specifics of what was brought up today.	

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45					1/7/2021	<b>Bob Jaques</b>	Some additional comments: there are so many acronyms, there needs to be an acronym page in the front. It would help me follow the discussion. In the Seaside, we have 3 aquifers, Aromas, Paso, Santa Margarita. I would like a figure that shows the relationship between the different aquifers and where different terminology is being used. I think they're all connected, but they seem to have different names based on which basin you are in.	Comment received.	
46					1/7/2021	<b>Sarah Hardgrave</b>	A suggestion, in terms of the figures, in figures 1-10, if you could put the 2017 and 2018 figures together, you could see the comparison across the years more easily instead of flipping between fig 1 and fig 5 (several pages away). There are some statements around the Deep Aquifer levels decreasing over time. I was wondering if those kinds of analyses are being included in the Deep Aquifer working group as well as with the SWIG, and also if this subbasin is being included in those committee discussion. I'm cognizant of the concerns of MCWD of the Deep Aquifer and the other parts of the valley, I want to make sure these concerns are being heard.	<b>Abby Ostovar:</b> We've worked very well with EKI, and been involved with these discussions. We wanted to get something out to this group. It just takes time to get through this coordination. We'll take this input and keep working.	
47					1/7/2021	<b>Patrick Breen</b>	The Deep Aquifer presentation was shared with the SWIG.	Comment received.	
48					1/7/2021	<b>Janet Brennan</b>	Regarding the findings of the Deep Aquifer I thought that was the outstanding information in this report. It's the most alarming, and good information I've seen.	Comment received.	
49					1/7/2021	<b>Sarah Hardgrave</b>	Statements around connection between aquifers, the Deep Aquifer being hydrologically connected to the Santa Margarita in the Seaside Basin and the Paso Robles being connected in another place. Connectivity, and concerns for the Seaside basin. Page 31 talked about FO 10 and FO11 monitoring wells and the Seaside watermaster report address those monitoring wells as well. I want to make sure those statements being reported here are consistent with what is being reported to the Water Master.  The Pumping tough north of this area, I would like to know what that means for this subbasin.	<b>Abby Ostovar:</b> The pumping trough is part of what EKI and MCWD presented to the SWIG. <b>DW:</b> Historically, the Deep is considered Lower Paso and below. And Santa Margarita gets pulled in. We're waiting to see just how connected all those really are. We're looking forward to seeing the Deep Aq investigation come out. <b>Abby Ostovar:</b> It may make more sense when CH 4 is released, and the rewrite.	
50					1/7/2021	<b>Sarah Hardgrave</b>	SWI, and the MCWRA lines with large swaths with question marks. How do we reconcile those areas where we don't have monitoring well information at the front of the SWI lines. How, in this subbasin, where additional monitoring wells will be needed. I think I brought that up at the MCWD meeting as well.	Comment received.	
51					2/23/2021	<b>Beverly Bean Email</b>	page 24 -section 3.1.5 delete the Ft Ord Reuse Authority( FORA) which was disbanded in 2020  page 46 section 3.5 1st paragraph eliminate the sentence about FOR A	Comment received.	