

COMMENTS RECEIVED JUNE 12, 2020 TO JULY 20, 2020: Edited: Comments received via letters are maintained in the Comment Letter Records. Comments recorded in this document are from meetings, emails and jotform submissions

Number	Subbasin	Chapter	Table	Page	Figure	Date	Commenter	Comment	Response	Action
1	UV					6/12/20	Tom Virsik	Based on what we heard at the BOD on the modeling, when will chapters 6, 9, and 10 be realistically available and when will the models be available to cross-check. Raising as continuing concern.	We are building chapters as we go. This is truly a planning process. Our goal is that you become our advisors in this process, you are really the first step to provide guidance. We do not have written chapters hiding anywhere. We want to honor the process. A committee-based, stakeholder-based process. I appreciate your comment.	
2	UV					6/12/20	Bill Lipe	I think we need to release all the chapters now. The slow-release underestimates people's ability to take in a lot of information, esp people who have been dealing with these issues for many years. I request all chapters be released so we can know what to expect. We're being told things can be changed down the road, but it's quite a process. Let people know, esp people who will financially be on the hook for these plans, let them see the whole picture. We need to be able to understand what all the moving parts are in these plans. Many people have concerns about the moving parts, the projects, the costs. I think this is the fair thing to do.	It is true, we have not written other chapters. Emily pointed out we are able to allude to them because we know the structure, so we know where the other information will be held. I will talk to staff about a different approach, possibly about releasing all information at once, 6-8 months. There is a way we can do that, but it won't be for some time. (DW)	
3	UV					6/12/20	Bill Lipe	There is concern about how we're going to pay for things. If you wait until the last minute to release the financial obligations with the plan, people are going to have concerns. I don't think we should wait on this, or when all the chapters are available. This started in 2017, and you ran a rigorous process, but I would think you're better at this now. I would hope you would be able to come up with a plan quicker this time.	Comment received. The plan is to receive direction from the committee on projects in October, the water charges framework in March and implementation direction in May.	
4	UV					6/12/20	Grant Cremers	I've had people reach out to me with similar concerns. They don't want to be at the point where it all comes into full view at the end, leaving a limited amount of time to work on it. I've spoken with business owners. They want to know the big picture and move on.	Comment received. The plan is to receive direction from the committee on projects in October, the water charges framework in March and implementation direction in May.	
5	UV					6/12/20	Jason Smith	I would add in what this will cost. This is all related to chapters, the models from the USGS, and money we're going to have to spend. I will say, we've all been most concerned about, is the transparency and communication. I don't know any other board or committee or agency with as much transparency as this one. We are a committee to address things to go to the AC to the BOD to go to public comment. I don't know how many more layers we'll need.	Comment received	
6	UV					6/12/20	Grant Cremers	Will our estimate of current rangeland and crop land diminish the future ability of rangeland to be converted to crop land?	Comment Received. The estimate of current crop land and current rangeland will be used to estimate the volume of water used at this time for the water budget.	
7	UV					6/12/20	Jason Smith	You said you're not going to make a determination about what is SW and what is GW. This has been a frustrating process because the double-counting has been used against us.	DW: I forgot to say I am not addressing what is GW and what is SW at this point. Will come back to us later, with attorneys. I am not making that assessment at this point, but we will have to address it later.	
8	UV					6/12/20	Nancy Isackson	I submitted comments from the SVWC. I think it's important to present data in factual way. This will come up in water budget. How will you account for different sources and how they're used, will be important for everyone to understand. Second question, comments from letter, how will those be responded to and when?	DW: Comment from your letter, re: water budget. The water budgets for the other subbasins we are looking at now will be divided in a more granular way: stream percolation, reservoir release, irrigation return flow. With water budget, still about accounting. But in plans, will need to be more detailed about what is GW and SW because this will be important in future. DW: Most of those comments are factual changes, or what Emily would call Admin comments. We will record them, and respond with how those changes will be made. We will not make the changes until the drafts go through all the committees to prevent multiple versions. We will be keeping a list as we go, then present to BOD how we'll address them.	

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9	UV	1				6/12/20	Tom Virsik	Page 1-1, many typos.	Comment received	
10	UV	3				6/12/20	Tom Virsik	Two pages labelled 3-2.	Comment received	
11	UV					6/12/20	Tom Virsik	On SW/GW issue, potential ramifications. Want to point out, Zone 2C is not entirety of previous Bulletin 118 boundary. I have clients that report to control board. They have extractions just outside the Zone 2C boundary.	Comment received.	
12	UV	3				6/12/20	Tom Virsik	Also, page 3-18, 3.4.3, MCWRA collects information from all wells. Not true.	Comment received	
13	UV	3				6/12/20	Tom Virsik	Page 3-2, description of MCWRA structure. Not quite right, not wildly wrong, have Mr. Girard or someone should look and make it accurate.	Comment received.	
14	UV					6/12/20	Nancy Isackson	For 180/400, you did a table of comments and your response. Will you do that as you go through each chapter? What about additional comments posted by the public?	DW: We try to keep the list as updated as possible to be sent to Adv. Committee. We're working on it now, incl online comment form. This will allow us to create table more automatically. So I will be promoting it more, and hopefully it will be online beginning next week.	
15	UV					6/12/20	Bill Lipe	Will you be taking a closer look at SW/GW reporting? The determination of whether you're pumping underflow vs GW, there's no legal declaration and I haven't seen much science.	DW: I am simply going to talk about what's reported to state and to MCWRA. The time will come when we will have to make assessments about what water is being pumped. I don't want to discuss underflow at this point. There will be other questions about MCWRA releases, conservation releases. They are releasing diverted water. What is that. Important questions when we start talking about what water and who's water. I don't know if we'll get conclusion during GSP process. We'll address at some time in future.	
16	UV					6/12/20	Bill Lipe	Water is diverted to stop floods and provide conservation. The claims are that the downstream rights supersedes the rights of the diverter. Some people would say "if that diversion wasn't there, it'd be natural flow and percolate." We know regionally the water acts different in different areas.	DW: Not my position now to say what is GW and what is SW. Needs to be part of process, but after we have Water Budgets more established.	
17	UV					6/12/20	Steve McIntyre	How are you going to get away from the possibility that much of this water is reported twice, and subsequently double counted? 30-40 wells I know are reported to both agencies. Are you going to add those? Will it skew water budget?	DW: It will not skew our water budget because we're going to use GW models and it will not double count. We can have discussion in the future about how much model works.	
18	UV					6/12/20	Grant Cremers	Sounds like we will try to address computation of SW/GW reporting. This is big point we want clarity on. Want something everyone in the basin will agree too.	Comment received	
19	UV			1		6/12/20	Grant Cremers	On released chapters, wording issues pg 1, 3rd para: wells were impacted or rendered unusable.... Needs rewording because that was due to reservoir management, we know from lawsuit settlement. Don't want to characterize basin as super-susceptible to drought.	Comment received	
20	UV					6/12/20	Grant Cremers	4th para: outline of how GSP will outline sustainability. We may already be in sustainability. Maybe we don't need to say that. Maybe we want to show how the subbasin is already sustainable.	Comment received	
21	UV					6/12/20	Grant Cremers	What is the current sustainability goal for subbasin? I don't see that anywhere.	Comment received	
22	UV					6/12/20	Bill Lipe	When subbasin boundary was extended to county line, the Upper Valley was very close to being low-priority, already pretty sustainable. No water for 3 years reached Spreckles, was a very unique situation. If reservoirs/respective rivers are impaired, repercussions for years. Recharge from rivers is ~85%. Upper Valley is unique, relatively balanced b/t water resources and water use.	Comment received	

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23	UV					6/12/20	Emily	The Upper Valley Subbasin Committee provided the following motion regarding the strategic direction for the draft Chapters 1, 3 and 4: 1) share information and Chapters as soon as possible; 2) the Subbasin should not be categorized as susceptible to drought and it should be shown how the Subbasin is already sustainable."	Motion was passed by Committee and will be incorporated.	
24	UV	3	3-2			7/16/2020 Jotform	Heather Lukacs	We request that this table include all Monterey County regulated drinking water systems and clearly distinguish between type of drinking water system. Local small water systems serve 2-4 connections, state small water systems serve 5-14 connections, private domestic wells serve 1 connection. In addition this table should list agricultural and industrial users as separate well types. This distinction is made in Figure 3-6 but not in this Table. It is important to distinguish between well type here in order to set the stage for good water budget estimates, for the monitoring network, and throughout the plan. This data is all readily available to the public and GSA.	Comment received	
25	UV	3				7/10/2020 email	Heather Lukacs	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.	Email Received	
26	UV	3				7/10/20 email	Heather Lukacs	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/	Email Received	

27	UV	3				7/10/2020 email	Heather Lukacs	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).	Email Received	
28	UV	3				7/10/2020 email	Heather Lukacs	Revise Chapter 3 to include a map of the service areas of all of the state and local small water systems like 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.	Email Received	