

Number	Chapter	Date	Commenter	Comment	Response	Action
1	3	7/10/2020	Heather Lukacs, Community Water Center	See letter attached.	Received	<p>Comment about plan area description:</p> <ul style="list-style-type: none"> <li>- Lists of 1) large public, 2) small public, and 3) local small and state small water system names and IDs were added to Appendix 3A. The number of connections for each system was included is available.</li> <li>- Private domestic wells are not included in "Communities Dependent on Groundwater" figure in Section 3.2.1; however, domestic wells are included in the figure showing Domestic Well Density in Section 3.3.</li> </ul> <p>Comment about water system maps:</p> <ul style="list-style-type: none"> <li>- Map of locations and service areas for 1) large public, 2) small public, and 3) local small and state small water systems was added to Chapter 3, symbology of map categorizes the water systems by number of connections. This map replaces the previous "Communities Dependent on Groundwater" figure. The water systems are not labeled on the map because there are too many water systems to fit all the labels for them; however, names of the water systems are included in SVBGSA's Web Map: <a href="https://portal.elmontgomery.com/?14">https://portal.elmontgomery.com/?14</a>.</li> <li>- Monterey County Environmental Health was contacted and the parcel data used to make water system boundaries for maps was update. In regards to their water quality data, County Health monitors for coliform at least annually, and nitrate and arsenic sampling depends on level and history. SVBGSA had originally planned to work with the County to add data from small and local water systems into the monitoring network; however, water quality data can't be easily compiled and sent to us to analyze. Same goes for any specific well data. In addition, there is sufficient other available data to characterize the basin. There were no water quality data gaps identified per SGMA requirements for GSPs as there is adequate spatial coverage to assess impacts to beneficial uses and users.</li> </ul> <p>Comment on Section 3.2.2: An 'Other' category was added to the water use sectors, which includes rural residential water use added to Section 3.2.2.</p> <p>Comment on Chapter 3 water quality discussion: § 354.16(d) is addressed in Chapter 5. Groundwater Conditions, including groundwater quality issues that may affect the supply and beneficial uses of groundwater, including a description and map of the location of known groundwater contamination sites and plumes. Maps of 2013 to 2019 exceedances of the Title 22 regulations in DDW and ILRP on-farm domestic wells and Basin Plan water quality objectives for ILRP irrigation supply wells are included in a new Chapter 5 Appendix.</p>
2	9	10/19/2020	Jerry Lohr	See letter attached.	Received	Noted.
3	9	11/3/2020	Nancy Isakson, Salinas Valley Water Coalition Board	See letter attached.	Received	Noted.
4	8	11/4/2020	Tom Virsik	See letter attached.	Received	Table 8-8's first line changed from "Appropriation" to "Appropriation per Permit." Text adjusted to say "the one permitted appropriative water right holder," and to note that pre-1914 rights might not be accounted for.
5		11/8/2020	James Sang	See letter attached.	Received	Noted.
6	9	1/5/2021	Salinas Valley Water Coalition Board	See letter attached.	Received	Noted.
7		1/12/2021	Salinas Valley Water Coalition Board	See letter attached.	Received	Noted.
8	All subbasins	3/10/2021	George Fontes, Salinas Basin Water Alliance (SBWA)	See letter attached.	Received	<p>Concerns about the effect of water budget calculations on farming have been noted and will be considered.</p> <p>We understand the desire to review water budgets before discussing pumping allocations as a potential management actions. This was done to have sufficient time to discuss projects and management actions because the model that was used to develop the water budget was not available at that point. The water budget chapters were released prior to finalizing those actions.</p> <p>2013 was used as an example for discussion, but the water budget uses data through 2016. Groundwater conditions chapter uses data through 2019. A key implementation action in the GSP will be GEMS expansion.</p>
9		3/23/2021	Curtis Weeks, Arroyo Seco Groundwater Sustainability Agency	See letter attached.	Received	
10	7	4/21/2021	George Fontes, Salinas Basin Water Alliance (SBWA)	See letter attached.	Received	<p>Noted. SVBGSA will work with MCWRA to determine the best way to improve the collection of groundwater pumping data in the Salinas Valley.</p> <p>The current GEMS data is the best available data and thus the only data that can be used to inform water budgets and projects and management actions.</p>

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11	6	4/22/2021	Gus Yates	See letter attached.	Received	<p>Water Budget Analysis Period were Poorly Chosen: Noted. The historical period was chosen to be consistent with the regulation requiring that historical water budgets be based on, "...the most recently available information and extending back a minimum of 10 years" (CCR, §354.18(c)(2)(B)). The historical average accounts for conditions during dry and wet periods. The GSP has been edited to note that the trend in the groundwater storage is more important than the storage difference between the beginning and ending years. The current tool being used for developing the water budget was the SVIHM, which ends in 2017. We initially selected 2017 as the current year for water budgets. However, a limitation in the model inputs for 2017 resulted in large uncertainty for that year. Thus, 2016 was selected because it was the last year simulated by the SVIHM. Current water budgets are merely reported and are not used for managing the GSP.</p> <p>SVIHM Model Produced Incorrect Storage Changes: Noted. Adjustments were made to the reported water budgets in the GSP to account for potential error in simulated pumping and change in storage.</p> <p>Estimated ASCMA Agricultural Pumping is too Low: Noted. The pumping in the provisional SVIHM is less than reported pumping Adjustments were made in the GSP to the reported water budgets and sustainable yield estimates to account for this discrepancy.</p> <p>A Different Method Should be Used to Estimate Sustainable Yield: SVBGSA recognizes that there is uncertainty in any sustainable yield estimate. To address this uncertainty, the Forebay GSP now includes a range of likely sustainable yield estimates. The sustainable yield estimates now incorporate the most accurate pumping data, addressing the concerns about inaccuracies in the simulated pumping. The comment is correct that sustainable yield addresses more than change in storage. The GSPs state that sustainable yield values are simply guidelines. Sustainability will not be measured solely by pumping within the estimated sustainable yield, but will be measured by avoiding undesirable results for all six sustainability indicators.</p> <p>Arroyo Seco Percolation is too Small: The GSP has been modified to acknowledge this discrepancy between measured and simulated Arroyo Seco Percolation. Model parameters related to stream seepage will be evaluated in the future and adjusted if appropriate. Adjustments could be made based on measured flows at gauges along the stream and other known or estimated inflows to and outflows from the stream between the gauges.</p> <p>Riparian ET Appears to be too Large: Noted. Riparian ET is estimated by the provisional SVIHM using input parameters specified by the USGS. Documentation on how riparian ET is simulated is not available at this time.</p>

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12	1 to 5, 7, and 8	4/23/2021	Heather Lukacs, Community Water Center & Horacio Amezcuita, San Jerardo Cooperative, Inc	See letter attached.	Received	<p>Chapter 3: A map of all DACs and a DAC appendix are added to Chapter 2. A map with all state and local small water systems for which the GSA has boundaries for is now included in Chapter 3. A table listing all water systems is added in Appendix 3A.</p> <p>Chapter 4: Text about the effect of groundwater pumping on groundwater quality was added to Chapter 5 in the "Distribution and Concentrations of Diffuse or Natural Groundwater Constituents" section. A discussion on the effect of lowering groundwater elevation on groundwater quality is included in Chapter 8 in the "Relationship between Individual Minimum Thresholds and Relationship to Other Sustainability Indicators" section for groundwater elevations under the degraded water quality bullet.</p> <p>Chapter 5:</p> <ul style="list-style-type: none"> <li>- Nitrate trends are included based on a review of existing studies. The analysis of temporal trends are not required and would entail substantial additional work that would not likely change the management approach. Water quality data for DDW wells and ILRP on-farm domestic and irrigation supply wells were used to make maps showing the spatial distribution of water quality exceedances of Title 22 or Basin Plan standards from 2013 to 2019 are now included in a new Chapter 5 Appendix.</li> <li>- The relationship between declining water levels and water quality degradation was evaluated for the Eastside Subbasin as presented in the December 2020 Subbasin Planning Committee Meeting. Although there seems to be a relationship between decreasing groundwater elevations and degrading water quality, within the analysis for the Eastside, subbasin-wide data does not show a strong correlation. Thus, the data is not definitive enough to determine if the decline in groundwater quality is due to additional loading of constituents or lowering of groundwater elevations. There maybe a correlation within individual wells, like is seen in San Jerardo, however, that could be due to those other factors.</li> <li>- Table 5-3 list the constituents of concern (COC) with exceedances in the latest sample for each COC in each well that has not been destroyed or abandoned, and it has been updated to be consistent with Table 8-5 that lists the minimum thresholds and measurable objectives for these constituents only. Table 8-6 list all the constituents for which data is available for the 3 types of wells in the monitoring network (DDW wells, ILRP on-farm domestic, and ILRP irrigation supply wells). Table 5-3 and Table 8-5 do not list all the constituents that have had an the exceedance in these 3 sets of wells, it only includes exceedances that occurred in the latest sample, while Table 8-6 includes all the constituents that were included in the analysis that have been sampled for historically in each set of wells.</li> </ul> <p>Chapter 6: The sustainable yield derived from the model has been adjusted based on pumping reported through the GEMS program. This GSP uses the central tendency climate scenario recommended by DWR. Although DWR encourages evaluation of the other extreme climate scenarios, they are not required and would not likely change the management approach at this time, so they are not currently included. Climate change assumptions will be reevaluated as part of the 5-year update.</p> <p>Chapter 7:</p> <ul style="list-style-type: none"> <li>- Groundwater Elevations: RMS wells were chosen based on geospatial distribution and well depth. Additionally, the network is dependent on the wells that are already monitored by MCWRA. This was done to avoid any overlap in monitoring of groundwater elevations. Thus, the types of wells that SVBGSA has access to is dependent on the wells that MCWRA has permission to monitor.</li> <li>- Water Quality: Small public water systems wells, regulated by Monterey County Health Department, include both state small water systems that serve 5 to 14 connections and local water systems that serve 2 to 4 service connections. SVBGSA had originally planned to work with the County to add data from small and local water systems into the monitoring network. These wells are not in the current proposed monitoring system because well location coordinates, construction information and quality data are not easily accessible. The Monterey County Health Department monitors water quality in the state small and local water systems and their data is not readily transferable. In addition, there is sufficient other available data to characterize the basin. There were no water quality data gaps identified per SGMA requirements for GSPs as there is adequate spatial coverage to assess impacts to beneficial uses and users. As stated above, the water quality monitoring approach has been updated in V2 to include last time any well was sampled, not just the most current year.</li> </ul> <p>Chapter 8:</p> <ul style="list-style-type: none"> <li>- Groundwater Elevations: Domestic well analyses were conducted for the minimum thresholds and measurable objectives. Wells that did not have accurate locations were not included, because water levels vary greatly throughout the Subbasin, thus, it is unlikely that the water level for the centroid of a PLSS section can accurately represent all wells that have the centroid of the section as their location.</li> <li>- Water Quality: Subbasin planning committees determined the approach to setting SMC.</li> </ul>

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13	9	4/28/2021	Community Water Center	See letter attached.	Received	<p>Local Groundwater Elevation Trigger: Thanks for support of the program (now titled Dry Well Notification System). This program focuses on access, not quality. A robust drinking water well mitigation program falls within the responsibilities of other agencies; however, the GSA may consider supporting such a program. The text has been revised to explicitly include it as a potential program that the GSA can collaborate with other agencies on through the Water Quality Partnership. To set MOs at 75% of the MCLs for drinking water, the GSA would need to take on responsibility for cleaning up groundwater contamination present prior to 2015, which would take significant effort and is not the GSA's responsibility. The GSA does acknowledge the need for action on water quality, and will work with other agencies to determine what the GSA's role in that is.</p> <p>The Domestic Water Partnership: This has been expanded to be the Water Quality Partnership. Domestic water quality will be a main issue, but it will also include other collaboration needed on water quality, as identified by stakeholders and DWR.</p>
14	7	5/12/2021	Norm Groot, Salinas Basin Agricultural Water Association (SBAWA)	See letter attached.	Received	The SVBGSA does not plan to set any additional water quality objectives in the GSP, rather the existing constituents of concern exceedance thresholds for irrigation wells are set based on Ag Order 4.0. This is clarified in the GSP text.
15	All subbasins	5/13/2021	Fred Nolan	See letter attached.	Received	We have scoped recycled water projects in subbasins where there is a sufficient quantity of available source water. We will continue to monitor future opportunities to use recycled water.
16	10	5/31/2021	Gus Yates	See letter attached.	Received	<p>Section 10.1.1.1: MCWRA water level data is not confidential. All of the water level data used in GSP monitoring is made publicly available through the SVBGSA web map. There is a well in the middle of the circle on the right, so please clarify your request. SVBGSA is proposing to add a groundwater elevation monitoring well in the left-hand data gap for ISW and it will be used for groundwater elevations too. This is clarified in the text.</p> <p>Section 10.1.1: Correct, SGMA regulations require reporting of groundwater level data twice a year (fall/spring). In the Forebay, 17/39 of RMS are on the monthly program and the rest are on the annual program. You are correct that we need to collect water level data twice per year. We will update the monitoring protocols to ensure that all wells that are on the annual program at least get onto a semi-annual program. For consistency throughout the Valley and with MCWRA, MTs are measured in Nov/Dec.</p> <p>Section 10.1.3.2: SVBGSA is in the process of establishing the ISW monitoring network. We have identified wells that appear to be adequate as noted in Ch 7 and these wells and their construction information, if available, are provided in a new ISW monitoring network Appendix. Not all these wells belong to Monterey County, although monitored by MCWRA, so once permission is secured from the well owner, the well will be added to the network. Some existing shallow wells that have been identified are deeper than 30 feet because they are shallow enough that they effectively represent the water table and the depth to water within those wells are typically within 30 feet.</p> <p>Section 10.1.4.1: The aquifer properties tests will be completed in deeper wells more representative of the Forebay aquifer, not in shallow wells.</p> <p>Page 5, 1st top-level bullet: In the HCM, lithologic and hydrostratigraphic data of the Deep Aquifers is a data gap. SVBGSA is requesting that DWR fill this through installing a well as part of the SGMA Technical Support Program.</p> <p>Page 10, bullet list: Noted.</p>
17	9	6/11/2021	Tom Virsik	See letter attached.	Received	<p>Sustainability Is Either to Be Maintained or Will Be Attained in The Future: GSP text has been edited to reflect that the UV, F, and L subbasins need to maintain (not attain) sustainability.</p> <p>Adaptation Cannot Be Limited To Deference To Others' Actions: The intent of the language was not to omit other arrays of power or GSA duties, so the GSP text has been revised to read: "...the GSA will consider the effect of any such changes in meeting sustainability goals and will act in furtherance of reaching such goals."</p> <p>Distinguishing Between Basin And "Valley" Must Be Clear and Specific: Suggested edits made.</p> <p>Price Of Land Is Not Uniform: The average cost of land and rent was derived from a source that had subbasin-specific estimates. It is understandable that even within a subbasin the cost of land acquisition is highly variable; however, this was the best available information on the average cost of land. Text was added noting that the cost of land is highly variable.</p> <p>Benefits and Costs Of Projects Are Inaccurate and/or Muddled: Text has been clarified to note when costs/benefits are "multi-subbasin", not "valley-wide" or "regional." The determination of which subbasins will pay for projects will be determined through a benefits assessment during GSP implementation. The Interlake Tunnel project includes the spillway modification, and the cost has been updated to reflect that.</p> <p>Water Metering Should Follow—Or At Least Not Contradict—State Regulations: Additional text has been added to the GEMS expansion implementation action noting that "program revisions will consider and not contradict related state regulations."</p>

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18	9 and 10	6/16/2021	Nancy Isakson, Salinas Valley Water Coalition Board	See letter attached.	Received	<p>Per the Implementation Agreement, the ASCMA is not distinguished from the rest of the Forebay Subbasin in Ch 9 because the projects and management actions could be implemented anywhere within the Forebay Subbasin, including in the management area. Projects and management actions will be implemented only if necessary, but the GSP should not preclude their implementation there.</p> <p>All references to “attaining” sustainability have been changed to “maintaining” sustainability.</p> <p>Section 9.1: Projects and management actions provide options for the next 50 years, and therefore, even though the Forebay is sustainable now, it does not eliminate the potential need for projects and management actions, including providing incentives to constrain groundwater pumping with limits.</p> <p>Section 9.2.1: The 180/400-Foot Aquifer Subbasin GSP was developed as part of a Valley-wide process to identify projects and management actions throughout the Salinas Valley, and the GSP included projects that benefited the groundwater anywhere in the Valley, not just the Subbasin. SVBGSA recognizes the stakeholder engagement that went into that process and built on it for the Forebay Subbasin GSP, but decided to narrow the focus on the Forebay Subbasin GSP to those projects that directly affect the Forebay.</p> <p>Section 9.2.2: water purchase costs are referred to for existing infrastructure only, not new infrastructure, that is being funded by or bonds being repaid through fees to water users. For example, this could be occurring if a water system incorporated the costs of a new well into the water purchase cost to its users. If this is already occurring, the costs are not included in the cost estimates for these projects.</p> <p>Section 9.3: Reach has been changed to maintain.</p> <p>Table 9-1: the cost breakdown between subbasins cannot be determined until the benefits breakdown is determined by an engineers report; however, the term “valley-wide” was changed to “multi-subbasin” to reflect that it is not necessarily applicable to the whole valley, nor shared equally.</p> <p>Section 10.1.4: As presented at the November 4, 2020 Forebay Subbasin Planning Committee meeting, there is/are multiple published reports that indicate that the Deep Aquifers, and/or the sediments which comprise the Deep Aquifers, exist into the Forebay Subbasin, even though the boundaries of this extent is are still uncertain. The Deep Aquifers refer to all the water-bearing sediments beneath the 400-Foot Aquifer in the 180/400-Foot Aquifer Subbasin, or their equivalent in neighboring the subbasins: Monterey, Forebay, Langley, and Eastside (Hanson, 2001). Other published reports from Thorup, MCWRA, Brown &amp; Caldwell, and others substantiate this statement as well. Furthermore, the extent and the continuity of the aquitards that separate the principal aquifers are unknown, and as such all the water-bearing sediments within the Forebay Subbasin are generally considered hydraulically connected. Therefore, any pumping at any depth within the Forebay Subbasin may have an impact on storage and recharge mechanisms throughout the Subbasin. MCWRA is preparing for the Deep Aquifers Study, and a more informed extent (lateral and vertical) of the Deep Aquifers will be investigated at this time. Additionally, the Zone 2C Subarea Boundaries, while analogous to the Bulletin 118 Subbasins, are not the same as the Bulletin 118 Subbasins.</p> <p>Section 10.3.2: The Forebay Pumping Restrictions TAC has been changed to an SMC TAC more similar to that of the Upper Valley, with Chapters 9 and 10 adjusted accordingly.</p> <p>Section 10.3: It has not yet been determined which agency will undertake these steps. SVBGSA and MCWRA have a collaborative relationship that acknowledges that the plans, policies, and infrastructure of each agency affects the other one. The text has been edited to clarify that “SVBGSA will work with MCWRA on these steps...”.</p> <p>Section 10.5.3: Although a water charges framework and water marketing are potential funding mechanisms, the Forebay Subbasin Planning Committee agreed they are not their preferred funding mechanisms.</p>

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19	2, 9, and 10	6/17/2021	Heather Lukacs, Community Water Center & Horacio Amezquita, San Jerardo Cooperative, Inc	See letter attached.	Received	<p>Chapter 2: Outreach strategies are outlined in the "Strategic Engagement of Disadvantaged Communities" proposal which was approved by the Board of Directors. Short and middle term actions were identified to complete from January 2021-August 2021 and work has begun on these items during the GSP development period and will be operational for implementation in Fall 2021. Middle and long-term actions associated with working with Underrepresented communities were identified for 2022.</p> <p>Chapter 9:</p> <ul style="list-style-type: none"> <li>- Recharge projects: Additional text was added to address the potential water quality concerns associated with recharge projects.</li> <li>- Reoperation of the Reservoirs: The Interlake Tunnel and Drought TAC are MCWRA projects, and therefore MCWRA is responsible for conducting cost-benefit analyses and ensuring that all beneficial water users are considered. For any projects pursued by the SVBGSA, SVBGSA will consider impacts on underrepresented communities during the project design phase.</li> <li>- Conservation and Ag BMPs: text was added to communicate the environmental benefits of compost and soil organic matter.</li> <li>- Fallowing: Text was added that water quality and access for drinking water wells should be considered when deciding where to incentivize agricultural fallowing or land retirement.</li> <li>- Forebay Pumping TAC: The Subbasin Committee decided to change this project to be similar to the UV SMC TAC.</li> <li>- UV SMC TAC: Groundwater quality is included within the purview of the SMC TAC, so it can make recommendations of projects that mitigate groundwater quality degradation for drinking water users, including impacts due to pumping.</li> <li>- Pumping allocations and control: Quantification of demand reductions needed will be determined as part of project selection and design, as it depends on what other projects and management actions are implemented.</li> <li>- Floodplain enhancement and recharge: The following text has been added: "The effect of increased recharge on surrounding groundwater quality will be considered when selecting sites."</li> <li>- GEMS Expansion: Which wells are included will be determined as part of the revision of the program.</li> <li>- Water Quality Partnership: The suggested activities (drinking water well mitigation program, integrating water quality across planning and implementation, and filling data gaps) are all potential activities under the Partnership. SVBGSA will work with partner agencies to prioritize activities that they will collaborate on under the Partnership.</li> <li>- Well registration:SVBGSA cannot meter de minimis users; however, the well registration program is intended to collect needed information on the wells that are in use.</li> <li>- Eastside Support Protection of Areas of High Recharge: This implementation action does not develop recharge projects itself, but rather seek to protect areas of naturally high recharge from future land uses that reduce its recharge capacity. This could include the use of low-impact cover crops, where appropriate.</li> <li>- Eastside new water supply projects: More detailed project scoping, cost-benefit analyses that will determine the benefit to each subbasin, and project prioritization will occur during GSP implementation and are needed steps prior to determining which projects will mitigate overdraft; however, as shown in Chapter 9, there are sufficient projects and management actions to mitigate overdraft in the Eastside.</li> </ul> <p>Chapter 10:</p> <ul style="list-style-type: none"> <li>- Whether to undertake interim actions and what those should be will be part of the discussion during GSP implementation.</li> <li>- The missing data on the locations of domestic wells will be gathered through the well registration program.</li> <li>- Small system data - Small public water systems wells, regulated by Monterey County Health Department, include both state small water systems that serve 5 to 14 connections and local water systems that serve 2 to 4 service connections. SVBGSA had originally planned to work with the County to add data from small and local water systems into the monitoring network. These wells are not in the current proposed monitoring system because well location coordinates, construction information and quality data is not easily accessible. The Monterey County Health Department monitors water quality in the state small and local water systems and their data is not readily transferable. In addition, there is sufficient other available data to characterize the basin. There were no water quality data gaps identified per SGMA requirements for GSPs as there is adequate spatial coverage to assess impacts to beneficial uses and users.</li> <li>- The GSA is already engaging with underrepresented communities.</li> <li>- Chapter 10 has been revised to include: "Implementation of this GSP will rely on best available science and will be continually updated as new data and analyses are available"</li> </ul>
20	9		Comprehensive River Management	See 125 letters attached.	Received	<p>Thanks to stakeholder feedback, river maintenance was added as component under the Multi-Benefit Stream Channel Improvements project. SVBGSA will collaborate with the agencies and organizations already undertaking this work - MCWRA, River Management Unit Association, and the Resource Conservation District of Monterey County.</p>