

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"> - 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. - 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. <p>Comment about water system maps:</p> <ul style="list-style-type: none"> - 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 too fit all the labels for them; however, names of the water systems are included in SVBGSA's Web Map: https://portal.elmontgomery.com/?14. - 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. <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	General concern 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>
3	1-5 & 7	3/12/2021	Brent Buche, Monterey County Water Resources Agency	See letter attached.	Received	<p>Chapter 3, Section 3.4.1 and 3.4.3 comments were noted and text was revised. Chapter 7, Section 7.3 and 7.9 comments were noted and text was revised to address them.</p>

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4	1 to 5, 7, and 8	4/23/2021	Heather Lukacs, Community Water Center & Horacio Amezquita, San Jerardo Cooperative	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"> - 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. - 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. - 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. <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"> - 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. - 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. <p>Chapter 8:</p> <ul style="list-style-type: none"> - 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. - Water Quality: Subbasin planning committees determined the approach to setting SMC. <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>
5	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>

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6		5/12/2021	Norm Groot, Salinas Basin Agricultural Water Association	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.
7		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.
8	2, 9, and 10	6/17/2021	Heather Lukacs, Community Water Center & Horacio Amezcua, San Jerardo Cooperative	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"> - Recharge projects: Additional text was added to address the potential water quality concerns associated with recharge projects. - 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. - Conservation and Ag BMPs: text was added to communicate the environmental benefits of compost and soil organic matter. - 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. - Forebay Pumping TAC: The Subbasin Committee decided to change this project to be similar to the UV SMC TAC. - 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. - 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. - 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." - GEMS Expansion: Which wells are included will be determined as part of the revision of the program. - 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. - 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. - 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. - 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. <p>Chapter 10:</p> <ul style="list-style-type: none"> - Whether to undertake interim actions and what those should be will be part of the discussion during GSP implementation. - The missing data on the locations of domestic wells will be gathered through the well registration program. - 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 assess impacts to beneficial uses and users. - The GSA is already engaging with underrepresented communities. - 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"