Chapter 1

Appendix 1-A

SVBGSA Joint Exercise of Powers Agreement

JOINT EXERCISE OF POWERS AGREEMENT

establishing the

SALINAS VALLEY BASIN GROUNDWATER SUSTAINABILITY AGENCY

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THIS JOINT EXERCISE OF POWERS AGREEMENT ("Agreement') establishing the Salinas Valley Basin Groundwater Sustainability Agency ("Agency") is made and entered into as of 12/22/16 ("Effective Date"), by and among the public agencies listed on the attached Exhibit "A" (collectively "Members" and individually "Member") for the purpose of forming a Groundwater Sustainable Agency ("GSA") and achieving groundwater sustainability in the Salinas Valley Groundwater Basin.

RECITALS

WHEREAS, in the fall of 2014 the California legislature adopted, and the Governor signed into law, three bills (SB 1168, AB 1739, and SB 1319) collectively referred to as the "Sustainable Groundwater Management Act" ("SGMA"), that initially became effective on January 1, 2015, and that has been amended from time-to-time thereafter; and

WHEREAS, the stated purpose of SGMA, as set forth in California Water Code section 10720.1, is to provide for the sustainable management of groundwater basins at a local level by providing local groundwater agencies with the authority, and technical and financial assistance necessary, to sustainably manage groundwater; and

WHEREAS, SGMA requires the designation of Groundwater Sustainability Agencies ("GSAs") for the purpose of achieving groundwater sustainability through the adoption and implementation of Groundwater Sustainability Plans ("GSPs") or an alternative plan for all medium and high priority basins as designated by the California Department of Water Resources; and

WHEREAS, SGMA requires that the Basin have a designated GSA by no later than June 30, 2017, and an adopted GSP by no later than January 31, 2020, if a high or medium priority basin in critical overdraft, and no later than January 31, 2022, if a high or medium priority basin; and

WHEREAS, SGMA authorizes a combination of local agencies to form a GSA by entering into a joint powers agreement as authorized by the Joint Exercise of Powers Act (Chapter 5 of Division 7 of Title 1 of the California Government Code) ("Act"); and

WHEREAS, each Member is a local agency, as defined by SGMA, within that portion of the Salinas Valley Groundwater Basin ("Basin" and as more fully described below) within Monterey County, which is designated basin number 3-004 in Department of Water Resources Bulletin No. 118 (update 2016), and consisting of seven sub-basins plus that portion of the Paso Robles sub-basin within Monterey County (but not including the adjudicated portion of the

Seaside sub-basin), each of which is designated as either a high or medium priority basin, and one of which (the 180/400 ft. aquifer) is designated in critical overdraft; and

WHEREAS, the Members are therefore authorized to create the Agency for the purpose of jointly exercising those powers granted by the Act, SGMA, and any additional powers which are common among them; and

WHEREAS, the Members, individually and collectively, have the goal of cost effective sustainable groundwater management that considers the interests and concerns of all beneficial uses and users of groundwater within and adjacent to the Basin; and

WHEREAS, the Members hereby enter into this Agreement to establish the Agency to serve as a GSA for the Basin and undertake the management of groundwater resources pursuant to SGMA; and

WHEREAS, the Members intend to cooperate with adjacent GSAs such as any GSA formed over a portion of the Paso Robles sub-basin (3-04.06) within San Luis Obispo County, and the Pajaro Valley Water Management Agency; and

WHEREAS, the Members intend to study the potential for state legislation to, among other amendments, amend the WRA Act to modify the governance structure of the WRA in a form similar to the governance of the Agency established herein and to establish that agency as the statutorily designated GSA for the Basin, or establish a new entity to be so designated;

NOW THEREFORE,

In consideration of the matters recited and the mutual promises, covenants, and conditions set forth in this Agreement, the Members hereby agree as follows:

Article I: Definitions

Section 1.1 – Definitions.

As used in this Agreement, unless the context requires otherwise, the meaning of the terms hereinafter set forth shall be as follows:

(a) "Act" means the Joint Exercise of Powers Act, set forth in Chapter 5 of Division 7 of Title 1 of the California Government Code, sections 6500, *et seq.*, as may be amended from time-to-time.

(b) "Agreement" means this Joint Exercise of Powers Agreement establishing the Salinas Valley Basin Groundwater Sustainability Agency.

(c) "Agency" means the Salinas Valley Basin Groundwater Sustainability Agency, which is a separate entity created by this Agreement pursuant to the provisions of the Act and SGMA.

(d) "Agricultural Directors" means the four Directors representing agricultural interests, as more fully set forth in rows (f) – (i) of Exhibit B of this Agreement.

(e) "Agricultural Association" means the Salinas Basin Agricultural Water Association.

(f) "Alternate Director" means an Alternate Director appointed pursuant to Section 6.6 of this Agreement.

(g) "Appointing Authority" means the entity authorized to appoint Primary and Alternate Directors pursuant to Sections 6.2, 6.3 and 6.6 of this Agreement and as identified in Exhibit B to this Agreement.

(h) "Basin" means that portion of the Salinas Valley Groundwater Basin, newly designated no. 3-004 in the Department of Water Resources' Bulletin No. 118 (update 2016), within the County of Monterey and that includes the following sub-basins: 1) 180/400 Foot Aquifer (No. 3-004.01); 2) East Side Aquifer (3-004.02); 3) Forebay Aquifer (3-004.04); 4) Upper Valley Aquifer (3-004.05); 5) Langley Area (3-004.09); 7) the newly designated Monterey sub-basin (3-004.10); and, 8) the portion of the Paso Robles Area (3-004.06) in Monterey County; but not including that portion of the Seaside Area that has been adjudicated, all as their boundaries may be modified from time to time through the procedures described in California Water Code section 10722.2 or by the Department of Water Resources under its separate authority, and not including any other area for which a GSA has been established pursuant to SGMA.

(i) "Board of Directors" or "Board" means the governing body of the Agency as established by Section 6.1 of this Agreement.

(j) "Brown Act" means the California Open Meeting Law, Government Code section 54950 *et seq.*

(k) "Bylaws" means the bylaws adopted by the Board of Directors pursuant to Section 6.8 of this Agreement to govern the day-to-day operations of the Agency.

(l) "Cause" means a conviction of a crime i) of moral turpitude, or ii) involving fraud, misrepresentation, or financial mismanagement, or iii) a finding by an administrative body or agency, or a court of law, that the person has violated any conflict of interest provision of federal, state or local law.

(m) "City Selection sub-Committee" means a subcommittee of the Monterey County City Selection Committee, established by Government Code section 50270 et seq, and consisting of the mayors of the following cities: Gonzales, Soledad, Greenfield, and King City.

(n) "County" means the County of Monterey.

(o) "CPUC" means the California Public Utilities Commission.

(p) "CPUC Regulated Water Company" means an investor owned water company operating in the Basin that has been granted a certificate of public convenience and necessity by the CPUC and is regulated by the CPUC.

(q) "Determination Date" means the date on which the Agency votes to notify the State of its intent to become a GSA as provided in Water Code sections 10723 (a) and (b).

(r) "Director" or "Directors" means Primary and Alternate Directors as set forth in Section 6.6 of this Agreement.

(s) "Director Position(s)" means those eleven Board positions, singularly or plural, established pursuant to Section 6.1 of this Agreement.

(t) "Disadvantaged Community" means a disadvantaged community or economically distressed area as those terms are defined in Water Code section 79702 (as may be amended from time-to-time) within the Basin.

(u) "Effective Date" means the date by which two Members have executed this Agreement which date shall be set forth in the introductory paragraph of this Agreement.

(v) "Fiscal Year" means that period of 12 months beginning July 1 and ending June 30 of each calendar year.

(w) "Groundwater Sustainability Agency" or "GSA" has the meaning set forth in California Water Code section 10721(j).

(x) "Groundwater Sustainability Plan" or "GSP" has the meaning set forth in California Water Code section 10721(k).

(y) "GSA Eligible Entity or Entities" means those entities eligible to become a GSA pursuant to SGMA.

(z) "Initial Board" means the initial Board of Directors established pursuant to Section 6.2, below.

(aa) "Initial Contribution" means the required contribution of Members as set forth in Section 10.4 of this Agreement.

(bb) "Local Agency" or "Local Agencies" has the meaning set forth in California Water Code Section 10721(n).

(cc) "Local small water system" means a system for the provision of piped water for human consumption that serves at least two, but not more than four, service connections, including any collection, treatment, storage, and distribution facilities under control of the operator of such system which are used primarily in connection with such system, and any collection or pretreatment storage facilities not under the control of the operator which are used primarily in connection with such system; it does not include two or more service connections, which supply dwelling units occupied by members of the same family, on one parcel, all as set forth in Monterey County Code section 15.04.020 (g).

(dd) "Majority Vote" means the affirmative vote of six Directors then present and voting at a meeting of the Board.

(ee) "Member" or "Members" means the GSA Eligible Entities listed in the attached Exhibit "A" that have executed this Agreement, including any new Members that may subsequently join this Agency with the authorization of the Board, pursuant to Section 5.2 of this Agreement.

(ff) "Mutual Water Company" has the meaning set forth in Corporations Code section 14300.

(gg) "Permanent Board" means the permanent Board of Directors established pursuant to Section 6.3 of this Agreement.

(hh) "Permanent Director" means a Director appointed to the Permanent Board.

(ii) "Permanent Director Position" means a Director Position on the Permanent Board.

(jj) "Primary Director" means a Primary Director appointed pursuant to Sections 6.4 of this Agreement.

(kk) "Public Water System" means a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year. A public water system includes the following: (1) Any collection, treatment, storage, and distribution facilities under control of the operator of the system that are used primarily in connection with the system, (2) Any collection or pretreatment storage facilities not under the control of the operator that are used primarily in connection with the system, or (3) Any water system that treats water on behalf of one or more public water systems for the purpose of rendering it safe for human consumption, all as set forth in Health and Safety Code section 116275 (h).

(ll) "South County Cities" means the cities of Gonzales, Soledad, Greenfield and King City.

(mm) "State" means the State of California.

(nn) "State Small Water System" means a system for the provision of piped water to the public for human consumption that serves at least five, but not more than 14, service connections and does not regularly serve drinking water to more than an average of 25 individuals daily for more than 60 days out of the year, as set forth in California Health and Safety Code section 116275 (n).

(oo) "Super Majority Vote" means the affirmative vote of eight Directors then present and voting at a meeting of the Board.

(pp) "Super Majority Plus Vote" means the affirmative vote of eight Directors then present and voting at a meeting of the Board but including the affirmative vote of three of the Agricultural Directors.

(qq) "Sustainable Groundwater Management Act" or "SGMA" means the comprehensive groundwater legislation collectively enacted and referred to as the "Sustainable Groundwater Management Act" as codified in California Water Code Sections 10720 *et seq.* and as may be amended from time-to-time.

(rr) "WRA" means the Water Resources Agency of the County of Monterey.

Unless otherwise indicated, all statutory references are to the statutory codes of the State.

Article II: The Agency

Section 2.1 – Agency Established.

There is hereby established a joint powers agency known as the Salinas Valley Basin Groundwater Sustainability Agency. The Agency shall be, to the extent provided by law, a public entity separate from the Members of this Agreement.

Section 2.2 – Purpose Of The Agency.

The purpose of Agency is to cooperatively carry out the requirements of SGMA including, but not limited to, serving as the GSA for the Basin and developing, adopting and implementing a GSP that achieves groundwater sustainability in the Basin, all through the exercise of powers granted to a GSA by SGMA and those powers common to the members as provided in the Act.

Article III: Term

Section 3.1 – Term.

This Agreement shall become operative on the Effective Date. Subject to the terms of Sections 11.6, 11.7 and 11.8, below, this Agreement shall remain in effect unless terminated pursuant to Section 11.10, below.

Article IV: Powers

Section 4.1 – Powers.

The Agency shall possess the ability to exercise those powers specifically granted by the Act, SGMA, and the common powers of its Members related to the purposes of the Agency, including, but not limited to, the following:

a) To designate itself the GSA for the Basin pursuant to SGMA.

b) To adopt rules, regulations, policies, bylaws and procedures governing the operation of the Agency and the adoption and implementation of the GSP.

c) To develop, adopt and implement a GSP for the Basin pursuant to SGMA.

d) To retain or employ consultants, advisors, independent contractors, agents and employees.

e) To obtain legal, financial, accounting, technical, engineering, and other services needed to carry out the purposes of this Agreement.

f) To conduct studies, collect and monitor all data related and beneficial to the development, adoption and implementation of the GSP for the Basin.

g) To perform periodic reviews of the GSP including submittal of annual reports.

h) To register and monitor wells.

i) To issue revenue bonds or other appropriate public or private debt and incur debts, liabilities or obligations.

j) To levy taxes, assessments, charges and fees as provided in SGMA or as otherwise provided by law.

k) To regulate and monitor groundwater extractions as permitted by SGMA, provided that this provision does not extend to a Member's operation of its system to distribute water once extracted or otherwise obtained, unless and to the extent required by other laws now in existence or as may otherwise be adopted.

l) To establish and administer projects and programs for the benefit of the Basin.

m) To cooperate, act in conjunction, and contract with the United States, the State, or any agency thereof, counties, municipalities, special districts, groundwater sustainability agencies, public and private corporations of any kind (including without limitation, investor-owned utilities), and individuals, or any of them, for any and all purposes necessary or convenient for the full exercise of the powers of the Agency.

n) To accumulate operating and reserve funds and invest the same as allowed by law for the purposes of the Agency.

o) To apply for and accept grants, contributions, donations and loans under any federal, state or local programs for assistance in developing or implementing any of its projects or programs in connection with any project untaken in the Agency's name for the purposes of the Agency.

p) To acquire by negotiation, lease, purchase, construct, hold, manage, maintain, operate and dispose of any buildings, property, water rights, works or improvements within and without the respective jurisdictional boundaries of the Members necessary to accomplish the purposes describe herein.

q) To sue or be sued in its own name.

r) To invest funds as allowed by law.

s) Any additional powers conferred under SGMA or the Act, or under applicable law, insofar as such powers are needed to accomplish the purposes of SGMA, including all powers granted to the Agency under Article 4 of the Act which are in addition to the common powers of the Members, including the power to issue bonds or otherwise incur debts, liabilities or obligations to the extent authorized by the Act or any other applicable provision of law and to pledge any property or revenues of the rights thereto as security for such bonds and other indebtedness.

t) Any power necessary or incidental to the foregoing powers in the manner and according to the procedures provided for under the law applicable to the Members to this Agreement and to perform all other acts necessary or proper to fully carry out the purposes of this Agreement.

Section 4.2 – Exercise Of Powers.

In accordance with Section 6509 of the Act, the foregoing powers shall be subject to the restrictions upon the manner of exercising such powers pertaining to the County.

Section 4.3 – Water Rights And Consideration Of All Beneficial Uses And Users Of Groundwater In The Basin.

As set forth in Water Code section 10723.2 the GSA shall consider the interests of all beneficial uses and users of groundwater in the Basin, as well as those responsible for implementing the GSP. Additionally, as set forth in Water Code section 10720.5(a) any GSP adopted pursuant to this Agreement shall be consistent with Section 2 of Article X of the California Constitution and nothing in this Agreement modifies the rights or priorities to use or store groundwater consistent with Section 2 of Article X of the California Constitution, with the exception that no extraction of groundwater between January 1, 2015 and the date the GSP is adopted may be used as evidence of, or to establish or defend against, any claim of prescription. Likewise, as set forth in Water Code section 10720.5(b) nothing in this Agreement or any GSP adopted pursuant to this Agreement determines or alters surface water rights or groundwater rights under common law or any provision of law that determines or grants surface water rights.

Section 4.4 – Preservation Of Police Powers.

Nothing set forth in this Agreement shall be deemed to modify or otherwise limit a Member's police powers in any way, or any authority to regulate groundwater under existing law or any amendment thereto.

Article V: Membership

Section 5.1 – Members.

The Members of the Agency shall be the entities listed on the attached Exhibit A so long as their membership has not been withdrawn or terminated pursuant to the provisions of Article XI of this Agreement. GSA Eligible Entities shall have until the Determination Date to execute this Agreement and pay their Initial Contribution, and become Members. Any GSA Eligible Entity that has not executed this Agreement and paid their Initial Contribution by the Determination Date shall be subject to the process described in Section 5.2, below, to become a Member.

Section 5.2 – New Members.

New Members may be added to the Agency by the unanimous vote of all other Members so long as: 1) the new Member is a GSA Eligible Entity; and, 2) the new Member agrees to or has met any other conditions that the existing Members may establish from time-to-time.

Once an application is approved unanimously by the existing Members the attached Exhibit A shall be amended to reflect the new Member.

Article VI: Directors And Officers

Section 6.1 – Board Of Directors.

The Agency shall be governed and administered by an eleven (11) member Board of Directors which is hereby established. All voting power of the Agency shall reside in the Board.

Section 6.2 – Initial Board of Directors.

An Initial Board shall be composed of the Director Positions with the qualifications and Appointing Authority as described in Exhibit B. The nominating groups identified in Section 6.5, below, may, but are not required to, provide nominations to the relevant Appointing Authority for the Initial Board; however, any such nomination must be received by the respective Appointing Authority no later than January 31, 2017. If such nominations are received no later than the time specified the Appointing Authorities shall follow the respective procedures for appointment to the Permanent Board set forth in Section 6.5, below. If such nominations are not received by the time specified, the Appointing Authority may make appointments to the Initial Board as it determines in its sole discretion.

The Initial Board shall serve only until September 30, 2017, at which time a Permanent Board shall be appointed as described below.

Section 6.3 – Permanent Board.

Subject to the Appointment and Nominating procedures set forth in Section 6.5, below, beginning on October 1, 2017, a Permanent Board shall be established consisting of the Director Positions with the qualifications and Appointing Authority as described in Exhibit B. With the exception of the CPUC Regulated Water Company Director Position, each Permanent Director Position shall have a term consisting of three (3) years and shall hold office until their successor is appointed by their Appointing Authority and the Agency has been notified of the succession. The terms of Permanent Director Positions shall be staggered, with Director Positions identified in rows (a), (c), (f), (h) and (j) of exhibit C serving three (3) year terms from initial appointment, and those identified in rows (b), (d), (g), (i), and (k) serving two (2) year terms from initial appointment, and thereafter serving three (3) year terms. The CPUC Regulated Water Company Director Position shall serve a term of two (2) years, and a Director shall hold office until their successor is appointed and the Agency has been notified of the succession. Notwithstanding the actual date of their initial appointment, for purposes of establishing the terms of Permanent Directors such initial appointment shall be deemed to have commenced on the July 1 preceding such initial appointment, and the terms of Directors shall thereafter commence on July 1 of the respective appointing year. Each Director Position shall require an affirmative appointment by the Appointing Authority for every term.

Section 6.4 – General Qualifications.

a) Each Director, whether on the Initial Board or Permanent Board, must have the following general qualifications:

i. General education and/or knowledge, interest in and experience relating to the control, storage, and beneficial use of groundwater.

ii. General understanding and knowledge of the Basin and all its beneficial users.

iii. Working knowledge and understanding of how to develop strategic plans, policies, programs, and financing/funding mechanisms.

iv. Genuine commitment to collaboratively work together to (i) achieve groundwater sustainability through the adoption and implementation of a GSP for the Basin, and all its beneficial uses; and (ii) provide for the ongoing sustainable management of the Basin.

v. General knowledge and understanding of one or more of the different facets (administration, financial, legal, organizational, personnel, etc.) needed for a successful and productive organization.

vi. Ability to commit the time necessary, estimated at a minimum 15-20 hours per month, to responsibly fulfill their commitment to the organization. This includes, but is not limited to: (i) Board meetings, (ii) Board training, (iii) analyzing financial statements and technical reports, (iv) reviewing Board documents before Board meetings, (v) attending Board meetings, and (vi) serving on committees to which they are assigned.

vii. A permanent resident within the Basin, or a representative of an agency with jurisdiction, or a business or organization with a presence, within the Basin.

b) Nominating groups and Appointing Authorities, as described in Section 6.5, should endeavor to avoid nominating or appointing a person to a Director Position that, because of his or her employment or other financial interest, is likely to be disqualified from a substantial number of decisions to be made by the Board on the basis of conflict-of-interest requirements.

Section 6.5 – Appointments and Nominations for Director Positions on the Permanent Board.

The appointment and nominating process for each Primary and Alternate Director Positions on the Permanent Board shall be as follows:

a) City of Salinas Director Position.

The City of Salinas shall appoint the Director Position listed in Row (a) of Exhibit B, the specific qualifications of such Director Position to be at the discretion of the City of Salinas.

b) South County Cities Director Position.

The Director Position listed in Row (b) of Exhibit B shall be filled by a representative from one of the four cities listed therein. The City Selection sub-Committee shall determine which city shall be the Appointing Authority for each term of the Director Position. The specific qualifications of such Director Position shall be at the discretion of that city designated the Appointing Authority. If the City Selection sub-Committee cannot reach agreement on a city to be the Appointing Authority for this Director Position, the County Board of Supervisors shall decide which city shall be the Appointing Authority.

c) Other GSA Eligible Entity Director Position.

i. Representative of the entities listed on Exhibit C shall be eligible to participate in the nominating process for the Other GSA Eligible Entity Director Position listed in Row (c) of Exhibit B.

ii. The representatives collectively by agreement among themselves shall make nominations to the Appointing Authority for the persons to fill both the Primary and Alternate Director Positions when the term of such position are expiring or are vacant.

iii. The representatives shall nominate one or more persons to fill both the Primary and Alternate Director Positions. If more than one person is nominated the representatives shall indicate the preferred nominee.

iv The Appointing Authority shall appoint the nominee (if only one) or appoint from among the nominees; the Appointing Authority may reject a nominee only for Cause. If the representatives cannot or do not forward any nominations the Appointing Authority shall make the appointment based upon its own determination.

v. The representatives may also advise the Appointing Authority regarding the removal of their nominee from the Director Positions for Cause. If the Appointing Authority determines that Cause exists such Director shall be removed and a new Director appointed to fill out the remaining term of the removed Director. The representatives may also request that their nominee in the Director Position be removed for any reason or no reason. If such request is made the Appointing Authority shall remove the Director and a new Director appointed to fill out the remaining term of the removed Director.

vi. From time-to-time entities may ask to be removed from Exhibit C. If such request is made the Appointing Authority shall notify the other Members and the Board, and Exhibit C shall be modified accordingly.

vii. From time-to-time other entities may request to be included on Exhibit C. The then-existing representatives shall inform the Appointing Authority if such requests are acceptable. If accepted by the representatives the Appointing Authority shall notify the other Members and the Board, and Exhibit C shall be modified accordingly.

d) Disadvantaged Community, or Public Water System Systems, including Mutual Water Companies serving residential customers, Director Position.

i. Representative of the entities listed on Exhibit D shall be eligible to participate in the nominating process for the Disadvantaged Community, or Public Water System Systems, including Mutual Water Companies serving residential customers, Director Position listed in Row (d) of Exhibit B.

ii. The representatives by agreement among themselves shall collectively make nominations to the Appointing Authority for the persons to fill both the Primary and Alternate Director Positions when the term of such positions are expiring or are vacant.

iii. The representatives shall nominate one or more persons to fill both the Primary and Alternate Director Positions. If more than one person is nominated the representatives shall indicate the preferred nominee.

iv. The Appointing Authority shall appoint the nominee (if only one) or appoint from among the nominees; the Appointing Authority may reject a nominee only for Cause. If the representatives cannot or do not forward any nominations the Appointing Authority shall make the appointment based upon its own determination.

v. The representatives may also advise the Appointing Authority regarding the removal of their nominee from the Director Positions for Cause. If the Appointing Authority determines that Cause exists such Director shall be removed and a new Director appointed to fill out the remaining term of the removed Director. The representatives may also request that their nominee in the Director Position may be removed for any reason or no reason. If such request is made the Appointing Authority shall remove the Director and a new Director appointed to fill out the remaining term of the removed Director.

vi. From time-to-time entities may ask to be removed from Exhibit D. If such request is made the Appointing Authority shall notify the other Members and the Board, and Exhibit D shall be modified accordingly.

vii. From time-to-time other entities may request to be included on Exhibit D. The then-existing representatives shall inform the Appointing Authority if such requests are acceptable. If accepted by the representatives the Appointing Authority shall notify the other Members and the Board, and Exhibit D shall be modified accordingly.

e) CPUC Regulated Water Company Director Position.

i. Representative of the entities listed on Exhibit E must meet the requirements of Section 1.1 (o) and shall be eligible to participate in the nominating process for the CPUC Regulated Water Company Director Position listed in Row (e) of Exhibit B.

ii. The representatives by agreement among themselves shall collectively make nominations to the Appointing Authority for the persons to fill both the Primary and Alternate Director Positions when the term of such position are expiring or are vacant.

iii. The representatives shall nominate one or more persons to fill both the Primary and Alternate Director Positions. If more than one person is nominated the representatives shall indicate the preferred nominee.

iv The Appointing Authority shall appoint the nominee (if only one) or appoint from among the nominees; the Appointing Authority may reject a nominee only for Cause. If the representatives cannot or do not forward any nominations the Appointing Authority shall make the appointment of an employee or agent of a CPUC Regulated Water Company listed on Exhibit E based upon its own determination.

v. The representatives may also advise the Appointing Authority regarding the removal of their nominee from the Director Position for Cause, although such authority to remove shall rest solely with the Appointing Authority.

vi. From time-to-time entities may ask to be removed from Exhibit E. If such request is made the Appointing Authority shall notify the other Members and the Board, and Exhibit E shall be modified accordingly.

vii. From time-to-time other entities may request to be included on Exhibit E. The then-existing representatives shall inform the Appointing Authority if such requests are acceptable. If accepted by the representatives the Appointing Authority shall notify the other Members and the Board, and Exhibit E shall be modified accordingly.

f) Agriculture Director Positions.

i. The Agricultural Association shall be eligible to participate in the nominating process for the Agriculture Director Positions listed in Rows (f) – (i) of Exhibit B. The Agricultural Association shall be solely responsible for its membership.

ii. The Agricultural Association shall make nominations to the Appointing Authority for the persons to fill each Primary and Alternate Director Position when the terms of such positions are expiring or are vacant.

iii. The Agricultural Association shall nominate at least two persons to fill each Director Position; the Agricultural Association shall indicate the preferred nominee for each Director Position.

iv The Appointing Authority shall appoint from among the nominees for each Director Position; the Appointing Authority may reject a nominee only for Cause. If the Agricultural Association cannot or does not forward any nominations the Appointing Authority shall make the appointment based upon its own determination.

v. The Agricultural Association may also advise the Appointing Authority regarding the removal of a nominee from a Director Position for Cause. If the Appointing Authority determines that Cause exists such Director shall be removed and a new Director appointed to fill out the remaining term of the removed Director. The Agricultural Association may also request that their nominee in a Director Position may be removed for any reason or no reason. If such request is made the Appointing Authority shall remove the Director and a new Director appointed to fill out the remaining term of the removed Director.

g) Environment Director Position.

i. Representative of the entities listed on Exhibit F shall be eligible to participate in the nominating process for the Environment Director Position listed in Row (j) of Exhibit B.

ii. The representatives by agreement among themselves shall collectively make nominations to the Appointing Authority for the persons to fill both the Primary and Alternate Director Positions when the term of such positions are expiring or are vacant.

iii. The representatives shall nominate at least two persons to fill both the Primary and Alternate Director Positions and the representatives shall indicate the preferred nominee.

iv The Appointing Authority shall appoint from among the nominees; the Appointing Authority may reject a nominee only for Cause. If the representatives cannot or do not forward any nominations the Board shall solicit applications from interested persons. At an open public meeting, the Board shall select qualified applicants whose names shall be forwarded to the Appointing Authority. The Board may indicate a preferred nominee. The Appointing Authority shall make the appointment from the list of candidates in its sole discretion. If the Board cannot, or does not, forward a list of candidates, the Appointing Authority shall make the appointment based upon its own determination.

v. The representatives may also advise the Appointing Authority regarding the removal of their nominee from the Director Position for Cause. If the Appointing Authority determines that Cause exists such Director shall be removed and a new Director appointed to fill out the remaining term of the removed Director. The representatives may also request that their nominee in the Director Position may be removed for any reason or no reason. If such request is made the Appointing Authority shall remove the Director and a new Director appointed to fill out the remaining term of the removed Director.

vi. From time-to-time entities may ask to be removed from Exhibit F. If such request is made the Appointing Authority shall notify the other Members and the Board, and Exhibit F shall be modified accordingly.

vii. From time-to-time other entities may request to be included on Exhibit F. The then-existing representatives shall inform the Appointing Authority if such requests are acceptable. If accepted by the representatives the

Appointing Authority shall notify the other Members and the Board, and Exhibit F shall be modified accordingly.

h) Public Member Director Position.

i. The Public Member Primary and Alternate Director Positions listed in Row (k) of Exhibit B shall be filled by application to the Board when the term of such position is expiring or is vacant.

ii. Board staff shall process the applications to an open and public meeting of the Board.

iii. At the public hearing, the Board shall select the qualified applicants whose names shall be forwarded to the Appointing Authority. The Board may indicate a preferred nominee.

iv The Appointing Authority shall appoint from among the nominees in its sole discretion. If the Board cannot or does not forward any nominations the Appointing Authority shall make the appointment based upon its own determination.

v. The Board may also advise the Appointing Authority regarding the removal of the Public Member Director for Cause, although such authority to remove shall rest solely with the Appointing Authority.

Section 6.6 – Primary Directors And Alternates.

Subject to the Appointing and Nominating procedures set forth in Section 6.5, above, each Appointing Authority shall appoint one Primary Director and one Alternate Director for each Director Position. With the exception of the Chairperson and Vice-Chairperson duties as more fully described in Section 6.7, below, the Alternate Director shall serve and assume the rights and duties of the Primary Director when the Primary Director is unable to attend or participate in a Board meeting. Unless appearing as a substitute for a Primary Director, Alternate Directors shall have no vote, and shall not participate in any discussions or deliberations of the Board, but may appear at Board meetings as members of the public. The Primary and Alternate Directors may be removed by their Appointing Authority only for Cause only upon the recommendation of or consultation with the nominating body for that Director Position, or upon the request of the nominating body for that Director Position. In the event that a Primary or Alternate Director is removed from their position, that Director Position shall become vacant and the Appointing Authority for that Director Position shall appoint a new Primary or Alternate Director pursuant to the provisions of Section 6.5 who shall fill the remaining term of that Director Position. In the event that a Director resigns from a Director Position, the Board shall notify the nominating body for that Director Position and the Appointing Authority for that Director Position shall appoint a new Primary or Alternate Director pursuant to the provisions of Section 6.5 who shall fill the remaining term of that Director Position.

Section 6.7 – Officers Of The Board.

a) Designation.

Officers of the Board shall consist of a Chairperson and Vice-Chairperson who shall be selected from the Primary Directors. The Chairperson shall preside at all meetings of the Board. Notwithstanding the appointment of an Alternate Director for the Chairperson, the Vice-Chairperson shall perform the duties of the Chairperson in the absence or disability of the Chairperson; however, the Alternate Director may otherwise attend and participate in the meeting as a substitute for the absent Primary Director. The Chairperson and Vice-Chairperson shall exercise and perform such other powers and duties as may be assigned by the Board. In the absence of both the Chairperson and Vice-Chairperson, and notwithstanding the appointment of an Alternate Director for the Director Position serving as Vice-Chairperson, the Board shall elect a Chairperson Pro-Tem from the Primary Directors to preside at a meeting; however, the Alternate Director for the Vice-Chairperson may otherwise attend and participate in the meeting as a substitute for the absent Primary Director.

b) Election.

The Board shall elect officers at the initial meeting of the Board, described in Section 7.1, below. The Primary Director appointed by the City of Salinas shall be designated as the Chairperson Pro Tem to convene and preside at the initial meeting of the Board, described in Section 7.1, until a Chairperson is elected by the Board. The Chairperson so elected shall serve in such capacity until June 30 of the succeeding calendar year. Thereafter, the Board shall annually elect the officers of the Board from the Primary Directors. Officers of the Board shall hold office for a term of one year commencing on July 1 of each calendar year and they may serve for multiple consecutive terms. Officers of the Board may be removed and replaced at any time, with or without cause, by a Majority Vote. In the event that an officer loses their position as a Primary Director, that officer position shall become vacant and the Board shall elect a new officer from existing Primary Directors to serve the remaining officer term.

Section 6.8 – Bylaws.

The Board shall adopt Bylaws governing the conduct of meetings and the day-to-day operations of the Agency on or before the first anniversary of the Effective Date.

Section 6.9 – Official Seal And Letterhead.

The Board may adopt, and/or amend, an official seal and letterhead for the Agency.

Section 6.10 – Conflict of Interest.

Directors shall be subject to the provisions of the California Political Reform Act, California Government Code section 81000 et seq, and all other laws governing conflicts of interests. Directors shall file the statements required by Government Code section 87200, et seq.

Article VII: Board Meetings And Actions

Section 7.1 – Initial Meeting.

The initial meeting of the Board shall be held at either the County Board of Supervisors chambers, located at 168 W. Alisal Street in Salinas, or at the Salinas City Council chambers, located at 200 Lincoln Avenue in Salinas within thirty days (30) days of the Effective Date of this Agreement. The date and time of the meeting shall be prominently publicized and noticed in addition to any requirements of the Brown Act in an effort to maximize public participation.

Section 7.2 – Regular Meeting Schedule.

At its initial meeting, and annually before July 1 of each calendar year thereafter, the Board shall establish a schedule of regular meetings, including time and place, at a location overlying the Basin. The Board may vote to change the regular meeting location, time and place, and may call special or emergency meetings, provided that the new, special or emergency meeting location remains at a place overlying the Basin, unless otherwise authorized by the Brown Act.

Section 7.3 – Principal Office.

At its initial meeting the Board shall establish a principal office for the Agency, which shall be located at a place overlying the Basin. The Board may change the principal office from time to time as the Board sees fit so long as that principal office remains at a location overlying the Basin.

Section 7.4 – Conduct Of Board Meetings.

Meetings of the Board of Directors shall be noticed, held, and conducted in accordance with the provisions of the Brown Act and such By-laws as the Board may adopt that are consistent with the Brown Act.

Section 7.5 – Quorum.

A quorum of the Board shall consist of a majority of the Director Positions.

Section 7.6 – Voting.

Each Director Position shall have one vote. In all cases, when a quorum is present, a Majority Vote shall be required to conduct business, unless a Super Majority Vote or a Super Majority Plus Vote is required.

Section 7.7 – Super Majority Vote Requirement.

Items that require a Super Majority Vote include the following unless otherwise required by law:

a) Approval of a GSP;

b) Amendment of budget and transfer of appropriations;

c) Withdrawal of Members pursuant to Section 11.6 (d); and,

d) Termination of Members pursuant to Section 11.7 (c).

Section 7.8 – Super Majority Plus Vote Requirement.

Items that require a Super Majority Plus Vote include the following unless otherwise required by law:

a) Decisions to impose fees not requiring a vote of the electorate or property owners;

b) Proposals to submit to the electorate or property owners (as required by law) decisions to impose fees or taxes; and

c) Limitations on well extractions (pumping limits).

Section 7.9 – Conflict Of Interest Code.

At the initial meeting of Board, the Board shall begin the process for adoption and filing of a Conflict of Interest Code pursuant to the provisions of the Political Reform Act of 1974 (Government Code section 81000 et seq.).

Article VIII: Board Committees

Section 8.1 – Committees Of The Board.

a) Board Committees.

The Board may from time-to-time establish one or more standing or ad hoc committees consisting of Directors to assist in carrying out the purposes and objects of the Agency, including but not limited to a Budget and Finance Committee, Planning Committee, and an Executive Committee. The Board shall determine the purpose and need for such committees. Meetings of standing committees shall be subject to the requirements of the Brown Act.

b) Advisory Committee.

The Board shall establish an advisory committee consisting of Directors and non-Directors. The advisory committee shall be designed to ensure participation by and input to the Board of those constituencies set forth in Water Code section 10723.2 whose interests are not directly represented on the Board. The Board shall determine the number and qualifications of committee members.

Article IX: Operations And Management

Section 9.1 – Initial Administrative And Legal Services.

One or more of the Members shall provide initial administrative, legal and other support services to the Agency at no charge until the appointment of the Permanent Board as provided in Section 6.3, above. The Members shall collectively determine which of the Members shall provide such services.

Section 9.2 – Contracting Administrative And Legal Services.

The Agency may engage one or more Members to provide administrative or legal services following the conclusion of the initial administrative and legal services described in Section 9.1 of this Agreement, on terms and conditions acceptable to the Board. Any Member so engaged shall have such responsibilities as are set forth in the contract for such Member's services.

Section 9.3 – Executive Director.

The Agency may appoint an Executive Director from time-to-time under terms and conditions to be determined by the Board. The Executive Director shall report to and serve at the pleasure of the Board. The Executive Director shall be responsible for the general administration of the Agency, the preparation and implementation of a GSP, and such other duties as may be determined by the Board. If the Board has contracted for administrative services as described in Section 9.2, above, and appoints an Executive Director, the Executive Director shall be responsible for the oversight and control of such contracted administrative services pursuant to the policies and directives established by the Board.

Section 9.4 – Legal Counsel And Other Officers.

a) General Counsel

The Agency may appoint a General Counsel from time-to-time under terms and conditions to be determined by the Board. The General Counsel shall report to and serve at the pleasure of the Board. The General Counsel shall be responsible for the general oversight of the Agency's legal affairs, including litigation. The Board may contract with other counsel for specialized legal services under the supervision of the General Counsel.

b) Treasurer and Auditor

The City of Salinas shall serve as the initial Treasurer and Auditor for the Agency upon its formation, and shall discharge the duties set forth in Sections 6505 and 6505.5 of the Act. Subsequent to formation of the Agency, the Board may appoint a separate Treasurer or separate Auditor pursuant to Section 6505.6 of the Act, and those officers shall discharge the duties set forth in Sections 6505 and 6505.5 of the Act, respectively. The Board may change such Auditor or Treasurer from time-to-time provided such chance is consistent with the Act.

c) Custodian of Property

The Public Works Director of the City of Salinas ("PW Director") shall serve as the initial Custodian of the Agency's Property as set forth in Section 6505.1 of the Act upon the Agency's formation. The PW Director shall file an official bond as described in Government Code section 1450 et seq. in the amount of $50,000, the premium of which shall be paid by the Agency. Subsequent to the formation of the Agency, the Board may designate a different Custodian provided such Custodian files an official bond in an amount required by the Board.

b) Other Officers

Subject to the limits of the Agency's approved budget, the Board may establish other officer positions and appoint and contract for the services of such other officers as it may deem necessary or convenient for the business of the Agency, all of whom shall serve at the pleasure of the Board.

Section 9.5 – Employees.

Subject to the limits of the Agency's approved budget, the Agency may hire employees to discharge the duties and responsibilities of the Agency, subject to the general oversight and control of the Executive Director.

Section 9.6 – Independent Contractors.

Subject to the limits of the Agency's approved budget, the Board may contract for the services of such consultants, advisers and independent contractors as it may deem necessary or convenient for the business of the Agency.

Article X: Financial Provisions

Section 10.1 – Fiscal Year.

The Fiscal Year of the Agency shall be July 1 – June 30.

Section 10.2 – Establishment Of Funds.

The Board shall establish and maintain such funds and accounts as may be required by generally accepted government accounting practices. The Agency shall maintain strict accountability of all funds and report all receipts and disbursements of the Agency on no less than a quarterly basis.

Section 10.3 – Budgets.

a) Initial Budgets

The initial budget of the Agency for the Fiscal Year ending June 30, 2017, shall not exceed $50,000. The budgets of the Agency for Fiscal Years 2017 – 2018 and 2018 – 2019 shall not exceed $1,100,000 each unless otherwise agreed to by the unanimous vote of the Members as described in Section 10.4, below.

b) Regular Budgets

Beginning for Fiscal Year 2019 – 2020, no later than sixty (60) days prior to the end of each Fiscal Year, the Board shall adopt a budget for the Agency for the ensuing Fiscal Year. The Board may authorize mid-year budget adjustments, as needed by Super Majority Vote.

Section 10.4 – Initial Contributions.

a) Fiscal Years 2017 – 2018 and 2018 - 2019

In order to provide the necessary capital to initially fund the Agency during Fiscal Year 2017 - 2018, the Members identified below shall each provide the listed Initial Contribution to the Agency's Treasurer/Auditor no later than July 7, 2017:

1)	County:	$670,000
2)	WRA:	$ 20,000
3)	City of Salinas:	$330,000
4)	City of Gonzales:	$ 20,000
5)	City of Soledad:	$ 35,000
6)	City of Greenfield:	$ 35,000
7)	City of King:	$ 30,000
8)	Castroville CSD	$ 20,000

In order to provide the necessary capital to fund the Agency during Fiscal Year 2018 – 2019, the Members identified below shall each provide the listed Initial Contribution to the Agency's Treasurer/Auditor no later than July 6, 2018:

1)	County:	$670,000
2)	WRA:	$ 20,000
3)	City of Salinas:	$330,000
4)	City of Gonzales:	$ 20,000
5)	City of Soledad:	$ 35,000
6)	City of Greenfield:	$ 35,000
7)	City of King:	$ 30,000
8)	Castroville CSD	$ 20,000

b) Additional Initial Contributions

New Members not listed above executing this Agreement no later than the Determination Date shall pay a minimum Initial Contribution of twenty thousand dollars ($20,000) per year for the two fiscal years. New Members not listed above executing this Agreement after the

Determination Date shall pay a minimum Initial Contribution of fifty thousand dollars ($50,000) per year for the two fiscal years.

Should the Board determine that additional funding for each of Fiscal Years 2017 – 2018 and 2018 – 2019 is necessary for Agency operations the Board shall adopt a resolution requesting each of the Members to consider additional funding and demonstrating in detail 1) the need for the funding, and 2) the purposes for which the additional funding will be utilized. Such requested funding shall be in the same proportion as the Initial Contributions set forth in Section 10.4 (a) unless the Members unanimously agree otherwise.

Upon receipt of the resolution requesting additional funding representatives of the Members may meet and confer regarding the request; however, each Member shall consider and act upon the request no later than 30 (thirty) days following the adoption of the resolution by the Board.

c) <u>Reimbursement of Initial Contributions</u>

To the extent the Agency is able to secure other funding sources, and to the extent permitted by law, the Agency shall reimburse these Initial Contributions to the Members on a proportionate basis in relation to their cumulative Initial Contributions to the Agency.

Section 10.5 – Payments To The Agency.

All costs and expenses of the Agency may be funded from: (i) voluntary contributions from third parties; (ii) grants; (iii) contributions from Members from time to time to supplement financing of the activities of the Agency; (iv) advances or loans from the Members or other sources; (v) bond revenue; and, (vi) taxes, assessments, fees and/or charges levied by the Agency under the provisions of SGMA or as otherwise authorized by law.

Section 10.6 – Directors' Stipends and Expenses.

Directors shall be eligible to receive a stipend in the amount of $ 100 for each Board meeting actually attended plus mileage to and from Board meetings. In addition, Directors shall be reimbursed for the actual and necessary expenses incurred in the discharge of their duties pursuant to an adopted Board policy. Directors are not required to accept the stipend or mileage, or expenses, and may decline the same by written notice to the Board.

Article XI: Relationship Of Agency And Its Members

Section 11.1 – Separate Entity.

In accordance with Sections 6506 and 6507 of the Act, the Agency shall be a public entity separate and apart from the Members.

Section 11.2 – Liabilities.

In accordance with Section 6507 of the Act, the debt, liabilities and obligations of the Agency shall be the debts, liabilities and obligations of the Agency alone and not of its Members. The Members do not intend hereby to be obligated either jointly or severally for the debts, liabilities or obligations of the Agency, except as may be specifically provided for in California Government Code Section 895.2 as amended or supplemented.

Section 11.3 – Insurance.

The Agency shall procure appropriate policies of insurance providing coverage to the Agency and its Directors, officers and employees for general liability, errors and omissions, property, workers compensation, and any other coverage the Board deems appropriate. Such policies shall name the Members, their officers and employees as additional insureds.

Section 11.4 – Indemnity.

Funds of the Agency may be used to defend, indemnify, and hold harmless the Agency, each Member, each Director, and any officers, agents and employees of the Agency for their actions taken within the course and scope of their duties while acting on behalf of the Agency. To the fullest extent permitted by law, the Agency agrees to save, indemnify, defend and hold harmless each Member from any liability, claims, suits, actions, arbitration proceedings, administrative proceedings, regulatory proceedings, losses, expenses or costs of any kind, whether actual, alleged or threatened, including attorney's fees and costs, court costs, interest, defense costs, and expert witness fees, where the same arise out of, or are attributable in whole or in part, to negligent acts or omissions of the Agency or its employees, officers or agents or the employees, officers or agents of any Member, while acting within the course and scope of an Member relationship with the Agency. Notwithstanding the foregoing, the sole negligence, gross negligence, or intentional acts of any Member is exempted from this Section 11.3 - Indemnity.

Section 11.5 – Agreements With Members

The Agency intends to carry out activities in furtherance of its purposes consistent with the powers established by this Agreement and with the participation of all Members. Notwithstanding the foregoing, the Board shall have the authority to approve any agreements with one or more Members in order to further the purposes of the Agency, including, but not limited to, the commencement of a condemnation action within the jurisdictional boundary of the agreeing Member or Members.

Section 11.6 – Withdrawal Of Members.

a) Any Member shall the have the ability to withdraw by providing ninety (90) days written notice of its intention to withdraw. Said notice shall be given to the Board and to each of the other Members. If such Member is an Appointing Authority, the Member's withdrawal shall not be effective unless and until the non-withdrawing Members agree to an amendment to this

Agreement providing for the composition of and appointment to the Board.

b) A Member shall not be fiscally liable for any contribution to an adopted budget provided that the Member provides written notice ninety (90) days prior to the adoption of the budget of its intention to withdraw.

c) In the event of a withdrawal, this Agreement shall continue in full force and effect among the remaining members as set forth in Section 11.8, below.

d) Notwithstanding the foregoing, Members shall not have the ability to withdraw if there is outstanding bonded debt or other long term liability of the Agency unless and until it is determined by the Board by Super Majority Vote that the withdrawal of the Member shall not adversely affect the ability of the Agency to perform its financial obligations pursuant to the bonded debt or other liability. The Board shall communicate its finding to the non-withdrawing Members who may approve the withdrawal by unanimous vote.

Section 11.7 – Termination Of Members.

a) As an alternative to pursuing litigation against a Member for failure to meet its funding obligations set forth in this Agreement or as may be adopted by the Board from time to time, the Board may vote to terminate such Member. The Board shall transmit its determination to the Members who may approve the termination by unanimous vote of the Members not proposed to be terminated. If such Member is an Appointing Authority, the Member's termination shall not be effective unless and until the non-terminated Members agree to an amendment to this Agreement providing for the composition of and appointment to the Board.

b) In the event of a termination, this Agreement shall continue in full force and effect among the remaining members as set forth in Section 11.8, below.

c) Notwithstanding the foregoing, Members may not be terminated if there is outstanding bonded debt or other long term liability of the Agency unless and until it is determined by the Board by Super Majority Vote that the termination of the Member shall not adversely affect the ability of the Agency to perform its financial obligations pursuant to the bonded debt or other liability. The Board shall communicate its finding to the Members who may approve the termination by unanimous vote of the Members not proposed to be terminated.

Section 11.8 – Continuing Obligations; Withdrawal Or Termination.

a) Provided that at least two Members remain, the withdrawal or termination of one or more Members shall not terminate this Agreement or result in the dissolution of the Agency; this Agreement shall remain in full force and effect among the remaining Members; and the Agency shall remain in operation.

b) Except as provided in Section 11.6 (b), any withdrawal or termination of a Member shall not relieve the Member of its financial obligations under this Agreement in effect prior to the effective date of the withdrawal or termination.

<u>Section 11.9 – Disposition Of Money Or Property Upon Board Determination Of Surplus.</u>

Upon determination by the Board that any surplus money is on hand, such surplus money shall be returned to the then existing Members in proportion to their cumulative contributions to the Agency, or such surplus money may be deposited in a Board designated reserve account. Upon determination by the Board that any surplus properties, works, rights and interests of the Agency are on hand, the Board shall first offer any such surplus for sale to the Members and such sale shall be based on highest bid received. If no such sale is consummated, the Board shall offer the surplus properties, works, rights and interests of the Agency for sale in accordance with applicable law to any governmental agency, private entity or persons for good and adequate consideration.

<u>Section 11.10 – Termination And Dissolution.</u>

a) <u>Mutual Consent</u>

i) Except as otherwise provided in this Section 11.10 (a), this Agreement may be terminated and the Agency dissolved at any time upon the unanimous approval of the Members provided that provision has been made by the Members for the payment, refunding, retirement, or other disposition of any bonded debt or other long term liability in the name of the Agency.

ii) Upon Dissolution of the Agency, each then existing Member shall receive a proportionate share, based upon the cumulative contributions of all then remaining Members, of any remaining assets after all Agency liabilities and obligations have been paid in full. The distribution of remaining assets may be made "in kind" or assets may be sold and the proceeds thereof distributed to the Members. The Agency shall remain in existence for such time as is required to determine such distribution, and the Board, or other person or entity appointed by the Members, shall be responsible for its determination. Such distribution shall occur within a reasonable time after a decision to terminate this Agreement and dissolve the Agency has been approved by the Members. No former Member that previously withdrew or was terminated as of the effective date of the decision to terminate this Agreement and dissolve the Agency shall be entitled to a distribution upon dissolution.

b) <u>Insufficient Members</u>

Subject to the provisions of Sections 11.6 and 11.7, should Members either be terminated or withdraw such that only one Member remains, this Agreement shall terminate and the Agency dissolved. In such event the last remaining Member shall be entitled to all assets of the Agency.

c) <u>Failure to be Financially Sustainable</u>

In the event that the Agency does not take the necessary actions to create a sustainable revenue stream necessary to fully finance its operating budget by the end of Fiscal Year 2018 – 2019 this Agreement shall terminate and the Agency shall be dissolved, unless otherwise agreed to by amendment to this Agreement approved unanimously by all then-existing Members. In the event of such termination and dissolution, the process of dissolution shall begin on July 1, 2019, and proceed as set forth in Section 11.10 (a) (ii), above.

d) Legislative Determination

Should the State adopt legislation specifying that the Basin should be managed by a statutorily designated entity this Agreement shall terminate and the Agency shall be dissolved upon such terms and conditions as the legislation may designate. Upon such dissolution, the assets and liabilities of the Agency shall be disposed of in the manner specified by the legislation. If the legislation does not so specify, the assets and liabilities of the Agency shall be disposed of in the manner provided in Section 11.10 (a), above.

Article XII: Miscellaneous Provisions

Section 12.1 – Complete Agreement.

The foregoing constitutes the full and complete Agreement of the Members. This Agreement supersedes all prior agreements and understandings, whether in writing or oral, related to the subject matter of this Agreement that are not set forth in writing herein.

Section 12.2 – Amendment.

This Agreement may be amended from time-to-time by the unanimous consent of the Members, acting through their governing bodies. Such amendments shall be in the form of a writing signed by each Member.

Section 12.3 – Successors And Assigns.

The rights and duties of the Members may not be assigned or delegated without the written consent of all other Members. Any attempt to assign or delegate such rights or duties in contravention of this Agreement shall be null and void. Any assignment or delegation permitted under the terms of this Agreement shall be consistent with the terms of any contracts, resolutions or indentures of the Agency then in effect.

This Agreement shall inure to the benefit of and be binding upon the successors and assigns of the Members hereto. This section does not prohibit a Member from entering into an independent agreement with another person, entity, or agency regarding the financing of that Member's contributions to the Agency or the disposition of proceeds, which that Member receives under this Agreement so long as such independent agreement does not affect, or purport to affect, the rights and duties of the Agency or the Members under this Agreement.

Section 12.4 – Dispute Resolution.

In the event there are disputes and/or controversies relating to the interpretation, construction, performance, termination, breach of, or withdrawal from this Agreement, the Members involved shall in good faith meet and confer within twenty-one (21) calendar days after written notice has been sent to all the Members. In the event that the Members involved in the dispute ("Disputing Members") are not able to resolve the dispute through informal negotiation, the Disputing Members agree to submit such dispute to formal mediation before litigation. If Disputing Members cannot agree upon the identity of a mediator within ten (10) business days after a Disputing Member requests mediation, then the non-Disputing Members shall select a mediator to mediate the dispute. The Disputing Members shall share equally in the cost of the mediator who ultimately mediates the dispute, but neither of the Disputing Members shall be entitled to collect or be reimbursed for other related costs, including but not limited to attorneys' fees. If mediation proves unsuccessful and litigation of any dispute occurs, the prevailing Member shall be entitled to reasonable attorneys' fees, costs and expenses in addition to any other relief to which the Member may be entitled. If a Disputing Members refuses to participate in mediation prior to commencing litigation, that Member shall have waived its right to attorneys' fees and costs as the prevailing party.

<u>Section 12.5 – Execution In Parts Or Counterparts.</u>

This Agreement may be executed in parts or counterparts, each part or counterpart being an exact duplicate of all other parts or counterparts, and all parts or counterparts shall be considered as constituting one complete original and may be attached together when executed by the Members hereto. Facsimile or electronic signatures shall be binding.

<u>Section 12.6 – Member Authorization.</u>

The governing bodies of the Members have each authorized execution of this Agreement, as evidenced by their respective signatures below.

<u>Section 12.7 – No Predetermination Or Irrevocable Commitment of Resources.</u>

Nothing herein shall constitute a determination by the Agency or any Members that any action shall be undertaken or that any unconditional or irrevocable commitment of resources shall be made, until such time as the required compliance with all local, state, or federal laws, including without limitation the California Environmental Quality Act, National Environmental Policy Act, or permit requirements, as applicable, have been completed.

<u>Section 12.8 – Notices.</u>

Notices authorized or required to be given pursuant to this Agreement shall be in writing and shall be deemed to have been given when mailed, postage prepaid, or delivered during working hours to the addresses set forth for each of the Members hereto on Exhibit "A" of this Agreement, or to such other changed addresses communicated to the Agency and the Members in writing.

<u>Section 12.9 – Severability And Validity Of Agreement.</u>

Should the participation of any Member, or any part, term or provision of this Agreement, be decided by the courts or the legislature to be illegal, in excess of that Member's authority, in conflict with any law of the State, or otherwise rendered unenforceable or ineffectual, the validity of the remaining portions, terms or provisions of this Agreement shall not be affected thereby and each Member hereby agrees it would have entered into this Agreement upon the same remaining terms as provided herein.

Section 12.10 – Singular Includes Plural.

Whenever used in this Agreement, the singular form of any term includes the plural form and the plural form includes the singular form.

IN WITNESS WHEREOF, the Members hereto, pursuant to resolutions duly and regularly adopted by their respective governing boards, have caused their names to be affixed by their proper and respective officers as of the day and year so indicated.

COUNTY OF MONTEREY

By Jane B Parker
Chair of the Board of Supervisors

Dated: 12-22-16

APPROVED AS TO FORM

CHARLES J. MCKEE, County ~~Counsel~~

By
LESLIE J. GIRARD

WATER RESOURCES AGENCY OF THE COUNTY OF MONTEREY

By
Chair ~~of the~~ Board of Supervisors of the Water Resources Agency

Dated: 1-31-2017

APPROVED AS TO FORM

CHARLES J. MCKEE, County Counsel

By

CITY OF SALINAS

By____________________________________
Mayor

Dated: ____________________________

Section 12.10 – Singular Includes Plural.

Whenever used in this Agreement, the singular form of any term includes the plural form and the plural form includes the singular form.

IN WITNESS WHEREOF, the Members hereto, pursuant to resolutions duly and regularly adopted by their respective governing boards, have caused their names to be affixed by their proper and respective officers as of the day and year so indicated.

COUNTY OF MONTEREY

By________________________________
Chair of the Board of Supervisors

Dated: ________________________

APPROVED AS TO FORM

CHARLES J. MCKEE, County Counsel

By________________________________

WATER RESOURCES AGENCY OF THE COUNTY OF MONTEREY

By________________________________
Chair of the Board of Supervisors of the Water Resources Agency

Dated: ________________________

APPROVED AS TO FORM

CHARLES J. MCKEE, County Counsel

By________________________________

CITY OF SALINAS

By________________________________
Mayor

Dated: 12-20-16

APPROVED AS TO FORM

CHRISTOPHER CALLIHAN, City Attorney

By Chirf S. Call

CITY OF SOLEDAD

By________________________________

Mayor

Dated: ________________________

APPROVED AS TO FORM

________________, City Attorney

By________________________________

CITY OF GONZALES

By________________________________

Mayor

Dated: ________________________

APPROVED AS TO FORM

________________, City Attorney

By________________________________

CITY OF GREENFIELD

By________________________________

Mayor

Dated: ________________________

APPROVED AS TO FORM

CHRISTOPHER CALLIHAN, City Attorney

By________________________________

CITY OF SOLEDAD

By________________________________
Mayor

Dated: 03/03/17

APPROVED AS TO FORM

Michael Rodriquez, City Attorney

By________________________________

CITY OF GONZALES

By________________________________
Mayor

Dated: ____________________

APPROVED AS TO FORM

____________________, City Attorney

By________________________________

CITY OF GREENFIELD

By________________________________
Mayor

Dated: ____________________

CITY OF GONZALES

By Maria Orozco

Maria Orozco, Mayor

Dated: 2/21/17

APPROVED AS TO FORM

By

Michael F. Rodriquez, City Attorney

Dated: 2-21-2017

APPROVED AS TO FORM

____________________, City Attorney

By____________________________________

CITY OF KING

By____________________________________
Mayor

Dated: 3-24-2017

APPROVED AS TO FORM

____________________, City Attorney

By 3-24-2017

CASTROVILLE COMMUNITY SERVICES

By____________________________________
Chair of the Board of Directors

APPROVED AS TO FORM

____________________, District Counsel

MONTEREY REGIONAL WATER POLLUTION CONTROL AGENCY

By____________________________________
Chair of the Board of Directors

APPROVED AS TO FORM

____________________, Agency Counsel

APPROVED AS TO FORM

____________________, City Attorney

By____________________________________

CITY OF KING

By____________________________________
Mayor

Dated: ____________________________

APPROVED AS TO FORM

____________________, City Attorney

By____________________________________

CASTROVILLE COMMUNITY SERVICES

By____________________________________
Chair of the Board of Directors

APPROVED AS TO FORM

____________________ District Counsel

APPROVED AS TO FORM

____________________, City Attorney

By____

CITY OF KING

By____

Mayor

Dated: ______________________________

APPROVED AS TO FORM

____________________, City Attorney

By____

CASTROVILLE COMMUNITY SERVICES

By____

Chair of the Board of Directors

APPROVED AS TO FORM

____________________, District Counsel

MONTEREY REGIONAL WATER POLLUTION CONTROL AGENCY

By Gloria De La Rosa

Chair of the Board of Directors

APPROVED AS TO FORM

Robert R. Wellington, Agency Counsel

EXHIBIT A

MEMBERS

COUNTY OF MONTEREY
County Administrative Officer
168 W. Alisal St., Salinas, CA 93901

WATER RESOURCES AGENCY OF MONTEREY COUNTY
General Manager

CITY OF SALINAS
City Manager

CITY OF SOLEDAD
City Manager

CITY OF GONZALES
City Manager

CITY OF GREENFIELD
City Manager

CITY OF KING (KING CITY)
City Manager

CASTROVILLE COMMUNITY SERVICES DISTRICT
General Manager

EXHIBIT B

BOARD OF DIRECTORS

	Director	Representing	Specific Qualifications	Appointing Authority
a)	City of Salinas.	City of Salinas.	To be determined by the Appointing Authority.	Salinas City Council.
b)	South County Cities.	Cities of Gonzales, Soledad, Greenfield, and King City.	To be determined by the Appointing Authority.	Appropriate City Council as recommended by the City Selection sub-Committee.
c)	Other GSA Eligible Entity.	GSA Eligible Entities but not including the cities of Salinas, Gonzales, Soledad, Greenfield or King City.	Must be a representative of a GSA Eligible Entity but not including the cities of Salinas, Gonzales, Soledad, Greenfield or King City.	Monterey County Board of Supervisors.
d)	Disadvantaged Community, or Public Water System, including Mutual Water Companies serving residential customers.	Unincorporated Disadvantaged Communities, or Public Water Systems, including Mutual Water Companies serving residential customers only.	Must be a resident of a Disadvantaged Community in the unincorporated area, or a representative Public Water System, including Mutual Water Companies serving residential customers only.	Castroville Community Services District.
e)	CPUC Regulated Water Company.	CPUC Regulated Water Companies in the Basin.	Must be a representative of a CPUC Regulated Water	Salinas City Council.

			Company.	
f)	Agriculture.	Agricultural interests.	Must be an individual that is: 1) engaged in, and derives the majority of his or her gross income or revenue from, commercial agricultural production or operations; or 2) designated by an entity this is engaged in commercial agricultural production or operations, and the individual derives the majority of his or her gross income or revenue from agricultural production or operations, including as an owner, lessor, lessee, manager, officer, or substantial shareholder of a corporate entity.	Monterey County Board of Supervisors.
g)	Agriculture.	Agricultural interests.	Same as (f).	Monterey County Board of Supervisors.
h)	Agriculture.	Agricultural interests.	Same as (f).	Monterey County Board of Supervisors.
i)	Agriculture.	Agricultural interests.	Same as (f).	Monterey County Board of Supervisors.
j)	Environment.	Environmental users and interests.	Must be a representative of an	Monterey County

			established environmental organization that has a presence or is otherwise active in the Basin.	Board of Supervisors.
k)	Public Member.	Interests not otherwise represented on the Board.	A rural residential well owner; an industrial processor; a Local Small or State Small Water System; or other mutual water company.	Monterey County Board of Supervisors.

EXHIBIT C

OTHER GSA ELIGIBLE ENTITY DIRECTOR POSITION NOMINATING GROUP

COUNTY OF MONTEREY

WATER RESOURCES AGENCY OF MONTEREY COUNTY

MONTEREY REGIONAL WATER POLLUTION CONTROL AGENCY

EXHIBIT D

DISADVANTAGED COMMUNITY, OR PUBLIC WATER SYSTEM, INCLUDING MUTUAL WATER COMPANIES SERVING RESIDENTIAL CUSTOMERS DIRECTOR POSITION NOMINATING GROUP

CASTROVILLE COMMUNITY SERVICES DISTRICT (Group Contact)
Eric Tynan, General Manager
11499 Geil St.
Castroville, CA 95012
(831) 633-2560 phone
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ENVIRONMENTAL JUSTICE COALITION FOR WATER

SAN JERARDO COOPERATIVE

SAN ARDO WATER DISTRICT

SAN VICENTE MUTUAL WATER COMPANY

EXHIBIT E

CPUC REGULATED WATER COMPANY DIRECTOR POSITION NOMINATING GROUP

ALISAL WATER CORPORATION DBA ALCO WATER SERVICE (Group Contact)
Thomas R. Adcock, President
249 Williams Road
Salinas, CA 93905
831-424-0441 phone
831-424-0611 fax
tom@alcowater.com

CALIFORNIA WATER SERVICE COMPANY

EXHIBIT F

ENVIRONMENT DIRECTOR POSITION NOMINATING GROUP

SUSTAINABLE MONTEREY COUNTY

LEAGUE OF WOMEN VOTERS OF MONTEREY COUNTY

LANDWATCH MONTEREY COUNTY

FRIENDS AND NEIGHBORS OF ELKHORN SLOUGH

CALIFORNIA NATIVE PLANT SOCIETY, MONTEREY CHAPTER

TROUT UNLIMITED

SURFRIDERS

THE NATURE CONSERVANCY

CARMEL RIVER STEELHEAD ASSOCIATION

Chapter 2
Appendix 2-A

Comments on the Draft GSP

1. Comment Table
2. Comment Letters
3. Comment Letters Responses

Number	Chapter	Table	Page	Figure	Comment Type	Date	Commenter	Comment	Response	Action
1					Meeting	6/3/2020	**Robin Lee**	The hydrology cross section demonstrates discontinuity from North to South, what about East to West?	Comment received.	Meeting comment - noted.
2					Meeting	6/3/2020	**Robin Lee**	The tributaries need to be reflected as flowing into the Rec Ditch	Comment received.	Meeting comment - noted.
3					Meeting	6/3/2020	**Robin Lee**	Should include more landmarks on maps for orientation	Comment received.	Meeting comment - noted.
4					Meeting	6/3/2020	**Robin Lee**	Landuse maps should include the upper watershed areas which aren't in the subbasin	Comment received.	Meeting comment - noted.
5					Meeting	6/3/2020	**Chris Bunn**	Are we going to prohibit the export of water out of the subbasin?	Comment received.	Meeting comment - noted.
6					Meeting	6/3/2020	**Chris Bunn**	If we don't know if Eastside pumping effects seawater intrusion or cone of depression, we should take it into account.	Comment received.	Meeting comment - noted.
7					Meeting	6/3/2020	**Chris Bunn**	Need photo from Eastside, not 180/400	Comment received.	Meeting comment - noted.
8					Meeting	6/3/2020	**Horacio Amezquita**	Will the compliance of each of the drinking water systems be noted?	Comment received.	Meeting comment - noted.
9					Meeting	6/3/2020	**Horacio Amezquita**	Do you have info on how much water has been extracted? (Future Chapter)	Comment received.	Meeting comment - noted.
10					Meeting	6/3/2020	**Horacio Amezquita**	Will you know how much water goes to the river and to the ocean? (Future Chapter)	Comment received.	Meeting comment - noted.
11	`				Meeting	6/3/2020	**Amy Woodrow**	The MCWRA has data from CASGEM wells that they are able to share	Comment received.	Meeting comment - noted.
12					Meeting	6/17/2020	**Robin Lee**	We need to treat this as a watershed, not as a receiving basin from upstream, since so much water does come from upstream.	DW: The watershed is something we want to acknowledge. GSA only has the authority to implement and take actions within the subbasin. We don't have authority to upper areas. We can make recommendations, but can't take action for upper watershed. These recommendations can be to county, or other groups that do have authority in these areas.	Meeting comment - noted.
13					Meeting	6/17/2020	**Robin Lee**	Would like to know about implications on water rights from Rec Ditch. Will it affect programs and actions for infiltration?	Donna: We will do some follow-up with Les on this too to get additional clarification. Derrik: RE: Whether water rights from Rec Ditch will impact future projects. If water rights in Rec Ditch are established, then yes they will come up in our projects. Whole question of GW and right you hold in common with everyone else, if someone established water in Rec Ditch is theirs by right, will come up in projects. It will go into Projects chapter, and what projects we can Implement.	Meeting comment - noted.
14					Meeting	6/17/2020	**Ross Clark**	Appreciate comments record, helps us feel our contributions are integrated. On comments #1, mine, to have GSA join GMC-IRWMP, administrative or strategic?	Emily: We would have to be invited. Is more administrative, not strategic for the plan.	Meeting comment - noted.
15					Meeting	6/17/2020	**Chris Bunn**	Recommend the use of water export outside basin at large be sent to ISP committee sooner for honest discussion. If this is not tackled honestly, opens up to lawsuits more later. Entire subbasin, but really whole Salinas Basin. Referring specifically to GW. Sometimes there are regulations in place that aren't followed through.	Comment received.	Meeting comment - noted.
16					Meeting	6/17/2020	**Colby Pereira**	Is goal to get these remarks added to document today and sent to Advisory Committee?	Emily: Yes, and also categorizing comments based on type.	Meeting comment - noted.
17					Meeting	6/17/2020	**Colby Pereira**	I think there need to be more opportunities for BOD education and public education. There is need for further information on the SW/GW subject.	Comment received.	Meeting comment - noted.
18	3	Table 3-2			Meeting	6/17/2020	**Horacio Amezquita**	Want to comment on table 3-2, well count, I think it will be a good idea to have a real count of domestic wells, small and state water systems, industrial, etc... If you have the correct count of all these wells and water systems, will be helpful to know where all water is going. If possible, recommend to have this in table.	DW: I'll take a closer look at that; administrative comment.	Noted.

19					Meeting	6/17/2020	**Emily Gardner**	The East Side Subbasin Committee provided the following motion regarding the strategic direction for the draft Chapters 1, 3 and 4: Recognize in the Plan the value of infiltration opportunities in this basin even though direct quantification of benefits is challenging. Recommend to the County of Monterey that land use planning for the upper watershed of the East Side Subbasin take into account the value of the upper watershed surface water and infiltration to groundwater which ultimately impacts the East Side Subbasin.	Motion received	Meeting comment - noted.
20	3	2-Mar			JotForm	7/16/2020	**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.	Table 3-2 was made using DWR's OSWCR database, and it does not provide information on the amount of agricultural and industrial wells so these categories have to be combined into the production category. The parcel data used to make Figure 3-6 came from Monterey Country, not from DWR so it is unlikely that these two data sources match up
25					Meeting	8/5/2020	**Chris Bunn**	Re: ISP committee: There's no 180/400 group right now, how is their representation being handled? The SWIG focus is different than a 180/400 committee representative.	Donna Meyers: There is a lot of overlap with some of the represented subbasin members. The 180/400 is a completed plan. The idea with the integrated plan committee, trying to stack the plans and make them consistent. Currently, Board is in charge of the adopted 180/400. Don't need a planning committee for the 180/400. Plan to go with existing subbasin committee as proposed, and with as much overlap as there is, think there are enough people. Will bring this to board next week, can flag question.	Meeting comment - noted.
26					Meeting	8/5/2020	**Heather Lukacs**	I appreciate this update. Will the subbasin see the draft chapters again? Will they see the draft before it goes out to the public?	Emily: Trying to show subbasin how their feedback is being received. Trying to get it back to the subbasin committee members before it goes out. It really boils down to timing. Will confirm that process.	Meeting comment - noted.
27					Meeting	8/5/2020	**Heather Lukacs**	Is there a deadline to receive comments for the preliminary draft chapters?	Emily: We will be batching comments as they are received and then the tables will be published. We will let you know the cutoff date for comments in 2021 to be incorporated into the V2 draft.	Meeting comment - noted.
28					Meeting	8/5/2020	**Horacio Amezquita**	Would be a good idea to have a workshop on water quality. We need a clearer picture of how water quality data will be handled. Seems like we don't know how the State water control boards are going to handle it. We don't know how many systems and private wells are contaminated. We need a clear picture of this. Would be good idea to have a workshop.	Comment received.	Meeting comment - noted.
29					Meeting	8/5/2020	**Chris Bunn**	Re: Subsidence: Is there an exception for earthquakes?	DW: We have included a lot of caveats, including "any change in land surface elevation due to lower groundwater levels is an undesirable result." So, if there's an earthquake or you relevel your land, that will not be included.	Meeting comment - noted.
30					Meeting	8/5/2020	**Ross Clark**	If we did have subsidence, could that alter surface water flow and condition, and cause other water issues?	DW: In this subbasin, it would need to be significant. In the San Joaquin valley, it is an issue because the canals have lost capacity because they don't have the slope. In this subbasin, it could happen, but I'm not sure that in this subbasin it will be that important.	Meeting comment - noted.
31					Meeting	8/5/2020	**Robin Lee**	Re: Depletion of surface water: I would still like to see tiger data superimposed so I can see it on the map. There's a map in Chapter 3 that is illegible. There is a place in Gabilan Creek where water flows year round, but I don't know where that boundary is so I can't see where it is. it would also be helpful to orient others to these locations.	DW: We did get that comment and we're going to get that data on. I apologize that we haven't put that data on yet.	Meeting comment - noted.

32					Meeting	8/5/2020	**Caroline Chapin**	I feel that of all the SMCs, this is the one [surface water depletion] we don't have a lot of understanding on. I see in the chapters that this will be updated with the model. Would your recommendations or options change with the model? Is the data gap too big to make an educated guess?	DW: We are not unique in this. Statewide, this is noted as the SMC with limited data and limited understanding of the statement "significant and unreasonable." With the model, we'll have a little bit more clarity, but it will not change the options of how to manage what is significant and unreasonable.	Meeting comment - noted.
33					Meeting	8/5/2020	**Chris Bunn**	Does SGMA require us to manage this SMC on behalf of flora and fauna?	DW: Our metric is not flow in a river, or height of water in a lake. We are not required to manage the flora and fauna, but we would be foolish to manage in a way that violates the ESA. We aren't strictly required to manage an ecosystem just the rate of depletion. No matter the decision we make, we will get push back from NMFS, TNC, etc. It is our job to balance all the needs of all GW users in the basin. There is no clear right/wrong answer, based on local preferences. Now remember, these GSPs are iterative. What we'll ask for at the next meeting are your preferences on direction. Don't focus on the perfect answer.	Meeting comment - noted.
34					Meeting	8/5/2020	**Ross Clark**	Our group has been involved in restoration work in the Natividad and Gabilan and Carr Lake is under phase 1 restoration now. I agree, we don't have enough understanding of the linkage between habitat support functions of surface water and the groundwater in this subbasin. Are there monitoring, or SW indicators, that would show some kind of impact of SW by management of GW? That way maybe we could manage based on those indicators. My group is also working on watershed restoration efforts that will enhance recharge. Especially for the 180/400, how does the clay layers interact with this system?	DW: Appreciate all those comments. If you bring those back to the next meeting as criteria for SMC, that's the direction we're looking for. In the 180/400 over the aquitard, we would manage it as a disconnected system. If truly perched water system, none of our actions would have impact. We treat as disconnected system.	Meeting comment - noted.
35					Meeting	8/5/2020	**Robin Lee**	Re: Groundwater Elevations: I have a couple requests for data: median and mean domestic well depths. Some ALCO and CAL water wells have been closed, can we get a list of wells that have been closed and the reason why?	DW: We can look into the domestic wells data, but I'll have to look into the second request.	Meeting comment - noted.
36					Meeting	8/5/2020	**Ross Clark**	Sustainable GW management has two components: the management of our subbasin does not affect other subbasin GW. I would focus those thoughts around maximum drawdown elevation because that could cause flow from other subbasins into our basin. From a sustainable management position, regardless of annual ft drop as something to monitor, isn't sustainable management making sure that during rainy season those elevations return to some perscribed elevation? Could we manage it to returning to winter GW elevation, versus setting base during summer pumping season?	DW: The first point, what is the impact of lowering GW levels with regard to other subbasins, we will get into that in a moment with SWI. Your second point, you are correct, managing basin to GW levels that are not overly influenced by pumping. MCWRA considers that their fall GW measurement. Other basins are managing to winter water levels. I think we should manage consistently throughout the basin, but yes, we don't want to be managing to late summer GW elevations.	Meeting comment - noted.
37					Meeting	8/5/2020	**Ross Clark**	Would focusing on winter GW levels lead to better incentivizing and recognizing the value of recharge projects from watershed practices and projects?	DW: I think using fall or winter levels would help us show the benefit of recharge projects.	Meeting comment - noted.
38					Meeting	8/5/2020	**Horacio Amezquita**	I think we should have a list of all wells that are being closed by contamination, not just ALCO or CAL water. If it's possible, it would be a good idea to have this list.	DW: I don't know if this is part of this presentation, but we are in contact with Enviro Health to get more data about this.	Meeting comment - noted.
39					Meeting	8/5/2020	**Robin Lee**	Re: Groundwater Storage: I was wondering about the cone of depression in the east of Salinas, and its location on the map. If you could show us these changes and levels on the map, I would appreciate it.	Comment received.	Meeting comment - noted.
40					Meeting	8/5/2020	**Chris Bunn**	Every year, will the sustainable yield pumping data will be crunched?	DW: Probably not every year, probably on a 3-5 year basis. The freqency of this analysis will probably be influenced by project implementation.	Meeting comment - noted.
41					Meeting	8/5/2020	**Ross Clark**	If you go back to the water budget, 83,000 AFY. This really goes to the scope of our environmental challenge. If we were able to identify projects that could increase infiltration by 7,000 AFY, we could say we were pumping sustainably?	DW: In broad general terms yes	Meeting comment - noted.
42					Meeting	8/5/2020	**Ross Clark**	If we said there was a lot of pumping concentrated in one area, would it impact the rest of the basin?H2:H20	DW: You have to meet all sustainability indicators at the same time.	Meeting comment - noted.

43	`				Meeting	8/5/2020	**Heather Lukacs**	I was wondering if you could share more information on the measure of sustainable yield? How you came up with these numbers and some key assumptions.	DW: Yes, and there will be more information in the report. These numbers came from the preliminary model for the Valley, with some future simulations. The overdraft is based on the anticipated drop in water levels. As we go forward, we're hoping we have more access to the model so we can refine the these numbers. This will help us figure out how to get to sustainability. These numbers change considerably as we implement projects.	Meeting comment - noted.
44					Meeting	8/5/2020	**Heather Lukacs**	We had a workshop and showed water levels. What stood out was that water levels in the eastside are so much lower than the other subbasins (1945-2018). To what extent do these estimates take into consideration historical conditions?	DW: These models take into account the historical conditions. This subbasin is very susceptible to drought.	Meeting comment - noted.
45					Meeting	8/5/2020	**Heather Lukacs**	RE: The cone of depression, I echo Robin's comments that when we look at impacts to private wells, we need to look at distribution of private wells as it relates to the GW levels throughout the basin.	Comment received.	Meeting comment - noted.
46					Meeting	8/5/2020	**Robin Lee**	There was a proposed development called Rancho San Juan on N side. They identified Santa Rita creek upland as recharge area, and found sand lenses. They were going to keep that area as an ag reserve to balance their water budget. It would be helpful to have that information. We also talked about the ranch above the Gabilan that sold their 10,000 acres for conservation. Where is that? It would be helpful to see it and would be helpful for analysis.	Comment received.	Meeting comment - noted.
47					Meeting	8/5/2020	**Horacio Amezquita**	If you have to do a reduction of water extraction, how much land do you think is going to be affected? Any idea of how many acres?	DW: I do not know how many acres this would be. This would be assuming there was no other projects being implemented. If reducing pumping was the only project, then options would be: rotational fallowing? Buy land? Invest in irrigation efficiency? We would have to continue to have these discussions.	Meeting comment - noted.
48					Meeting	8/5/2020	**Horacio Amezquita**	I live near the Gabilan creek, there is a lot of water flowing and going to the river. Is there a way for the county to hold that water and then release it for recharge?	DW: Please bring this up when we talk about projects.	Meeting comment - noted.
49					Meeting	8/5/2020	**Ross Clark**	I want to understand the next meeting and projects development	DW: We will discuss some projects, initial list, projects that have risen to the top and looking for feedback. But bring more ideas and we can discuss.	Meeting comment - noted.
50					Meeting	8/5/2020	**Ross Clark**	How will those projects be developed? We've gone through similar processes in this watershed in the past through IRWM, Stromwater projects and work with the City of Salinas.	DW: We have looked at those plans and proposed projects.	Meeting comment - noted.
51					Meeting	8/5/2020	**Chris Bunn**	Re: Seawater Intrusion: There's no discussion in this section on how the ES would affect the 180/400. Do we have an obligation to articulate that?	DW: You have an obligation to make sure plan doesn't prevent a neighboring subbasin from achieving sustainability. So, if you lower GW levels too much, and that may prevent the 180/400 from preventing SWI, they can say their neighbor is preventing them from reaching sustainability. To avoid that, this is why the ISP is so important, to work out any differences between the subbasins.	Meeting comment - noted.
52					Meeting	8/5/2020	**Horacio Amezquita**	How far away is SWI from the ES?	DW: Approximately 1mi, based on the map	Meeting comment - noted.
53					Meeting	8/5/2020	**Horacio Amezquita**	If it gets closer, where water is below sea level, can it contaminate the whole basin?	DW: Recall, it has not been moving much in the last several years. Also recall, there is a geologic difference between the two subbasins. SWI may not flow as easily into the ES as it has flowed through the 180/400. The geologic difference between subbasins may slow it down.	Meeting comment - noted.
54					Meeting	8/5/2020	**Horacio Amezquita**	Re: Degraded Water Quality: How are we going to monitor when a water system or a well gets contaminated? Does the regional water board or health dept inform the GSA? How will that work out?	DW: Every year we download data from Division of DW, and we have set up a relationship with the county as well. It will be an annual download.	Meeting comment - noted.
55					Meeting	8/5/2020	**Horacio Amezquita**	Will that data be available to the public?	DW: We will make data public that is already publicly available.	Meeting comment - noted.

56					Meeting	8/5/2020	**Heather Lukacs**	Re: Degraded Water Quality: I appreciate the 3 bullet points. They are helpful for thinking about impacts to wells. I think in the 180/400 you have summary tables of how many wells had nitrate above the MCL. We would like the data for each well, so people can determine how close they are to wells that are at risk of going over MCL. It is a request to have baseline water quality data for all wells in the subbasin.	DW: We will take that comment under consideration.	Meeting comment - noted.
57					Meeting	8/5/2020	**Heather Lukacs**	The only way to know is to know if there is going to be a significant and unreasonable impact, and what is happening at that well, you have to know what the water quality it at that monitoring point. Also trend data would be helpful and is available.	Comment received.	Meeting comment - noted.
58					Meeting	8/5/2020	**Chris Bunn**	Re: Draft chapter strategic comments: What is the cutoff date for input to version going to AC?	DW: You have quite a bit of time. We can incorporate comments submitted through April. If they are significant comments, we will not make significant changes at that time. We're looking for significant comments now so we can change direction if need be.	Meeting comment - noted.
59					Meeting	8/5/2020	**Ross Clark**	Following up on GW/SW indicators. I think there's an opportunity to investigate indicators or monitor approaches to make sure we don't compromise our interconnected surface water through looking at habitat rigor and sustainability.	Comment received.	Meeting comment - noted.
60					JotForm	8/26/2020	**Robin Lee**	Please provide watershed maps for the langley and eastside subasins before Sept 2. Also, provide map with tiger data.	Comment received.	Watershed maps were added to Chapter 4 V2.
61					Meeting	10/7/2020	**Chris Bunn**	Subsidence SMC: Motion to accept Option 1: Any subsidence anywhere in the Subbasin is significant and unreasonable using the metric of InSAR data	Motion was passed by Committee and will be incorporated into GSP.	This will be incorporated into GSP development as a strategic comment. See memo for further discussion.
62					Meeting	10/7/2020	**Brenda Granillo**	Groundwater Storage SMC: Motion to accept Option 1: Pumping in excess of the sustainable yield leads to significant and unreasonable impacts.	Motion was passed by Committee and will be incorporated into GSP.	This will be incorporated into GSP development as a strategic comment. See memo for further discussion.
63					Meeting	10/7/2020	**Chris Bunn**	Is this only tied to seawater intrusion within this subbasin, so seawater intrusion in the 180/400-Foot Aquifer is a separate issue?	DW: Yes, this is strictly for the Eastside subbasin, because we can't set SMCs for another subbasin. When we get to projects then we could involve other subbasins.	Meeting comment - noted.
64					Meeting	10/7/2020	**Caroline Chapin**	Seawater Intrusion SMC: Motion to accept Option 1: Any seawater intrusion in the Subbasin is significant and unreasonable using the metric of chloride isocontour at the subbasin boundary.	Motion was passed by Committee and will be incorporated into GSP.	This will be incorporated into GSP development as a strategic comment. See memo for further discussion.
65					Meeting	10/7/2020	**Robin Lee**	Re: Water Quality: I attended the Regional Board public discussion and it seems like they want SGMA to start improving water quality, so we should consider improving it. At least that's what I got from the meeting. That's just my two cents.	Comment received.	Meeting comment - noted.
66					Meeting	10/7/2020	**Chris Bunn**	Does the Regional Board have the power to influence SGMA?	Abby Ostover: That's a good question. LES: There will be competing powers between governmental entities. The Regional Board can't intrude...but by the same token they do have independent authority to do certain things. So it would be a relationship management issue between the Regional Board and GSA, especially if the GSA adopts a criteria that another Agency doesn't agree with. Gary: We see value in aligning ourselves as appropriate with programs of the Regional Board, but our focus needs to be on the development of the GSPs. Abby: GSPs are living documents and we will adjust them as needed to changing regulations.	Meeting comment - noted.
67					Meeting	10/7/2020	**Brenda Granillo**	Another thing to consider is possible funding for improving groundwater quality, we definitely want to keep that in mind.	Comment received.	Meeting comment - noted.

68					Meeting	10/7/2020	**Heather Lukacs**	Water quality in SGMA needs to be considered. We see that groundwater quality is degrading so we need to identify the threats and opportunities where quantity and quality can both benefit from projects and management actions. The way we manage groundwater does influence water quality. I agree we won't solve it all and we need coordination.	Comment received.	Meeting comment - noted.
69					Meeting	10/7/2020	**Horacio Amezquita**	I think it's important that we monitor water quality because then how will we determine if it is being degraded if we don't monitor it. In my system, water quality has been degrading and I'm sure there's other water systems that are being degraded, too.	Comment received.	Meeting comment - noted.
70					Meeting	10/7/2020	**Ross Clark**	It would be nice if the GSP acknowledges the lack of coordination or commits to support some of the small groundwater dependent communities, the state hasn't had ability to address their needs. GSA could help address these needs through a coordination or advocacy role.	Comment received.	Meeting comment - noted.
71					Meeting	10/7/2020	**Chris Bunn**	We have to be careful to not intrude on the domain of MCWRA and County Health. There is a lot of monitroing and oversight and testing going on and we are supplying that data already to those agencies. We have to make sure SGMA doesn't reach beyond what it's supposed to be doing.	Comment received.	Meeting comment - noted.
72					Meeting	10/7/2020	**Colby Pereira**	We have to be careful that processes are streamlined, we don't want too much overlap. We need to recognize that and stay within the course of SGMA.	Comment received.	Meeting comment - noted.
73					Meeting	10/7/2020	**Caroline Chapin**	I'm in agreement with Colby and Mr. Bunn, we all agree that water quality is important but I hesitate saying that we want to go beyond maintaining; improving opens a lot of questions from other agencies. It complicates the main goal of sustainability.	Comment received.	Meeting comment - noted.
74					Meeting	10/7/2020	**Robin Lee**	We've been hearing that groundwater quality is decreasing so we have to first do better to be able to maintain current conditions because we need to stop water quality conditions that are on a downhill slope. We have to do better and work with agencies like the Health Department.	Comment received.	Meeting comment - noted.
75					Meeting	10/7/2020	**Caroline Chapin**	I think we should use projects to consider the importance of water quality.	Comment received.	Meeting comment - noted.
76					Meeting	10/7/2020		Water Quality SMC: Motion to accept Option 1: Degraded groundwater quality resulting from direct GSA actions is significant and unreasonable as measured by the number of supply wells.	Motion was passed by Committee and will be incorporated into GSP.	This will be incorporated into GSP development as a strategic comment. See memo for further discussion.
77					Meeting	10/7/2020	**Robin Lee**	The votes for Option 1 and Option 4 seemed very similar, but I think shallow wells should be the driver, because we need more data on years for Option 1. I will not approve 2015 level, that is way too low. Come back with different data elevations. Also, we need mean and median well depths for domestic wells.	Abby Ostovar: Do you have a year in mind? We do have the computed average for domestic well depth in the Eastside.	Meeting comment - noted.
78					Meeting	10/7/2020	**Robin Lee**	Could I get the depth to water for 2015 WLs?	DW: We can add ground surface elevations to well hydrographs.	Meeting comment - noted.
79					Meeting	10/7/2020	**Robin Lee**	So we need to know if the year 2015 had an impact on domestic wells? I need more analysis to choose an approach.	Abby Ostovar: Yes, but right now we want the approach before we do the analysis and pick a year. Also, for reference, the Webmap has elevations and depth to water.	Meeting comment - noted.
80					Meeting	10/7/2020	**Chris Bunn**	Do you have perforation data? We look at depth and perforation very differently.	Abby Ostovar: The data we have depends on the well, so for some we have depth and others perforation. DW: We looked at total depth in the 180/400 because we didn't have perforation information for enough of the domestic wells. If we have the perforation information, we can use that.	Meeting comment - noted.
81					Meeting	10/7/2020	**Heather Lukacs**	Table 7.1, how many are domestic wells? The draft chapter only shows irrigation and observation wells.	Abby Ostovar: We do have the designation. We have expanded the network, I'm pretty sure Ch. 7 went out after we sent letters to owners but I will check.	Meeting comment - noted.

82					Meeting	10/7/2020	**Heather Lukacs**	We need a way to compare individual hydrographs to the cumulative one. Make sure axis is there and that the land surface elevation is also there, so we can see how domestic wells have been impacted.	Abby Ostovar: We don't have a lot of domestic hydrographs, the analysis was based on OSWCR database which doesn't have water levels. We have depth and location, but not consistent elevation data.	Meeting comment - noted.
83					Meeting	10/7/2020	**Robin Lee**	Can we see water quality over time? Is there a graph of nitrate over time? I think it's raising over time and if the water levels are decreasing and nitrate increasing we need to look at water quality in domestic wells as water levels go down. These two things happen together.	Abby Ostovar: We haven't made anything like that, but we do have other data from other studies. DW: There is a map in Chapter 5 that you could look at nitrate over time.	Meeting comment - noted.
84					Meeting	10/7/2020		Groundwater Elevation SMC: Motion for a combination of Options 1 and 4, groundwater elevations in a certain year were significant and unreasonable and impacting shallow, domestic wells is significant and unreasonable. With a request for additional data on minimum elevations.	Motion was passed by Committee. Additional data will be provided at the next meeting for further discussion.	This will be incorporated into GSP development as a strategic comment. See memo for further discussion.
85					Meeting	10/7/2020	**Robin Lee**	Since we only have a couple places where groundwater is within 50ft, I want to know why? Is groundwater so depleted that there is only two places where it connects with surface water?	Abby Ostovar: This is only for groundwater in the principal aquifer. DW: Abby is right, and the Eastside subbasin has a large amount of land elevation change. The hydrographs support what we see on this map. These interconnected surface water areas are where the land surface is the lowest.	Meeting comment - noted.
86					Meeting	10/7/2020		Depletion of Interconnected Surface Water SMC: Motion to accept Option 3: The current rate of surface water depletion is not unreasonable (although it may be significant). Using the metric of groundwater levels.	Motion was passed by Committee and will be incorporated into GSP.	This will be incorporated into GSP development as a strategic comment. See memo for further discussion.
87					Meeting	10/7/2020	**Chris Bunn**	I would like to hear the pros and cons of both metrics for Interconnected Surface Water.	Comment received.	Meeting comment - noted.
88					Meeting	10/7/2020	**Robin Lee**	Re: Projects presentation: I had talked about scalping plant and I don't see it listed as a project possibility.	DW: Oh yes, that is my fault. We will include it in the list of projects.	Meeting comment - noted.
89					Meeting	10/7/2020	**Robin Lee**	Rancho San Juan identified recharge around Santa Rita Creek. I don't know how to list that as a possibility.	DW: We're incorporating that suggestion into the Langley subbasin. We will look into what thay project would look like.	Meeting comment - noted.
90					Meeting	10/7/2020	**Robin Lee**	How efficient is it to grow strawberries in the Eastside vs in the 180/400? Does it takes less water because the soil is better?	DW: We could look into water efficiency but the GSA does not have land use authority.	Meeting comment - noted.
91					Special Meeting	10/13/2020	**Ross Clark**	Re: Intro to Projects and Management Actions: Before we get into specifics can we talk about the process? We have a less than optimal but functioning system now, what we want to do is find a way to enhance our current conditions to meet the needs of users. Some of the noted projects might not be beneficial to our subbasin as they are for other subbasins. We want to find projects to get more water into the aquifer or reduce overdraft. Did I get all that right?	DW: Yes. There are two dials. Usually people choose to increase recharge, however, I always keep reduction of pumping in our back pocket because sometimes it is better approach financially.	Meeting comment - noted.
92					Special Meeting	10/13/2020	**Chris Bunn**	Two of the big issues you're talking about is that there is interactions between the subbasins and that there might be interactions between the projects in terms of integration but you also talk about that some of the projects are standalone for the subbasin. I don't see how we can have this discussion without always keeping an eye on the other subbasins. For example, the Eastside canal, if we take that water out at the diversion point, that means it's not going to wherever it used to go before.	DW: Great point, Eastside projects have to be closely integrated to other projects because, for example, like the Eastside canal will have a great impact on 180/400. When we talk about recharge from streamflow, this will be integrated, but less integrated, because there will be smaller impacts on the 180/400. At this point we're trying to get an idea of what each subbasin is interested in so that we can see if they will work well together in an integrated fashion. When it comes to cost, this will be slightly different. For example, if we chose to fund through Prop 218 we identify who benefits and divide the costs accordingly. Right now we are just identifying a program.	Meeting comment - noted.
93					Special Meeting	10/13/2020	**Robin Lee**	Do you have a graphs increase in irrigated acreage over time in the Subbasin?	DW: Not with me, but I think we have the data.	Meeting comment - noted.

94					Special Meeting	10/13/2020	**Robin Lee**	The reason I ask because I want to know how much groundwater decreases as irrigated acreage increases. Is that a big driver? I was looking at the groundwater elevations which are decreasing over time, and then I was looked at the contours and I noticed that some of the cones of depression from the 90s have disappeared. I was wondering why that was?	DW: I have looked at the cones of depression, but I haven't looked at any causalities.	Meeting comment - noted.
95					Special Meeting	10/13/2020	**Horacio Amezquita**	Are there any projects in the Gabilan Mountains that could hold the water at the higher elevations so we could use it later on to inject in the Eastside subbasin?	DW: We haven't included any project like an off-stream or on-stream reservoir, the reason we have not included it is because on-stream reservoirs are hard to permit and operate within the time we have to reach sustainability. But if it's the feeling of the committee that that's the way to go we could certainly integrate that into the project ideas.	Meeting comment - noted.
96					Special Meeting	10/13/2020	**Horacio Amezquita**	When you talk about getting water to the aquifer, do you think it will be clean when it is infiltrated?	DW: If we're going to inject water through a well, it has to be filtered to a high level. Water has to be filtered and chlorinated before injecting. If you do a basin, we pretty much just need the fines to settle before it goes to infiltration better.	Meeting comment - noted.
97					Special Meeting	10/13/2020	**Horacio Amezquita**	On the permit to bring water from the Salinas River, are you talking about Chualar or Soledad? It is expensive?	DW: We'll talk about both of them. We'll talk about the costs at the end of the talk.	Meeting comment - noted.
98					Special Meeting	10/13/2020	**Kelly Archer**	I'm most interested in understanding how you all are approaching groundwater contamination like Nitrates and 1,2,3-TCP. Is that approached within each of the subbasins or integrated among subbasins?	DW: The legislation for SGMA treats groundwater quality as a do-no-harm issue and the point of that is because there are many other agencies within the basin that already regulate groundwater quality. The reason SGMA was written this way was because we don't want to take on things that other agencies are doing. The general consensus of this group is that we don't want to take on the responsibility for cleaning up groundwater but if we have the opportunity to do so with a project or management action we will try to do so.	Meeting comment - noted.
99					Special Meeting	10/13/2020	**Brenda Granillo**	I wanted to ask about the Chualar and Soledad diversion programs. Have there been any studies about these? Also a project that should be included is wastewater, especially in the city of Salinas and future development. Developers should put in purple pipes to irrigate with recycled water.	DW: We did take Robin's input from last week on recycled water. We met with our engineer to talk about this and the feasibility.	Meeting comment - noted.
100					Special Meeting	10/13/2020	**Robin Lee**	It is a scalping plant. They're doing this in Santa Ana. They're small and way more cost efficient than a canal. It completes the hydrologic cycle.	Comment received.	Meeting comment - noted.
101					Special Meeting	10/13/2020	**Ross Clark**	One of the problems we have in the Salinas Valley is that we have little water in the summer and too much in the winter. How do we enhance our surface water network to keep water in the foothills longer, increasing percolation? How can we expand on these concepts and put them into context with some of the other engineering projects? How do we do this from a more ecosystem-watershed management perspective?	DW: Multi-benefit recharge projects are projects that everyone wants to see. They have a better chance of getting permitting success. If this is one of the ways we want to go with, then we will try to compare projects as best as we can to compare projects apples to apples. It's up to us to bring it up to that level.	Meeting comment - noted.
102					Special Meeting	10/13/2020	**Chris Bunn**	The discussion of pumping reduction and the fallowing and the water charges framework is something that should start in the farming community. Could we get a skeleton of the framework so that we can begin the discussion? If that conversation doesn't start with farmers, this will not go well. Also, have you modeled the effect of pumping and pumping reduction in the 180/400 and Salinas and how that effects the Eastside? Because if we don't have the model we'd be making a lot of assumptions.	DW: You're right, farmers definitely need to be the first to discuss this. As for the modeling, that has not been done directly but there is a question out there for the Eastside as to whether the largest portion of overdraft is in the Salinas area. And if we can solve this problem, could that be an ample fix for overdraft for the whole subbasin? That is a model scenario we will run. It's important to note that when we run these models we look at all projects from all subbasins. We look at the basin holistically.	Meeting comment - noted.

103					Special Meeting	10/13/2020	**Horacio Amezquita**	I was wondering if what Ross was describing about holding up the water in the foothills if that water could be injected to the aquifer, if we do that will that hurt the 180/400 aquifer? Most of that water is going to the river and main channel going to the 180/400 because it's still needed for seawater intrusion.	DW: I think the best way to do this is infiltrating stormwater flows through percolation. The best approach might be to slow these flows and spread them. There is so much water I don't think there would be a negative impact on the 180/400. I actually think it would be beneficial because we would be stopping these big floods.	Meeting comment - noted.
104					Special Meeting	10/13/2020	**Horacio Amezquita**	Most of the acreage in the winter is listed and then the water runs off. Wouldn't it be a better idea to allow the water to infiltrate into the fields and crops won't have to use so much water because there is water already in the soil?	DW: On-farm recharge is mostly used where there are permanent crops, mostly done with vineyards or orchards in the central valley. It is a possibility but it would take a lot of research to figure out if this could be done with annual crops.	Meeting comment - noted.
105					Special Meeting	10/13/2020	**Ross Clark**	I read an article about this specific question, one of the things they noted is that the highly permeable soils are covered in plastic which compromise the recharge potential of the fields in the Eastside. It might be very easy to integrate this with farmers if it doesn't compromise production.	DW: We're still looking at projects at a very high level. So I'm viewing onfarm recharge as an overland flow capture option.	Meeting comment - noted.
106					Special Meeting	10/13/2020	**Robin Lee**	How do the rice farmers flood their fields in the winter? Is there a similarity here? Strawberry fields pretty much behave like asphalt.	DW: The reason why they flood the rice fields so well in the Sacramento Valley is because the water doesn't percolate well. A better example of what to compare the Eastside to would be the Pajaro Basin, because they take advantage of the percolation ability of their soils.	Meeting comment - noted.
107					Special Meeting	10/13/2020	**Robin Lee**	During the last drought, companies provided a program for homeowners to have incentive to switch from grass to drought tolerant landscaping. Can we see the data showing what happened to the wells when they hit drought conditions? Would the water company share that with us? What happens to the wells when they cut back on water usage?	DW: Let us see what we could do. It would be hard to pinpoint what is causing the change in groundwater elevations. DW: Should we also add xeriscaping to the list of projects?	Meeting comment - noted.
108					Special Meeting	10/13/2020	**Chris Bunn**	We have a lot of strawberry acreage and it doesn't behave like asphalt. The Salinas Valley is an innovative community and farmers are all about long-term stewardship but that conversation needs happen among farming community.	Comment received.	Meeting comment - noted.
109					Special Meeting	10/13/2020	**Dennis Lebow**	I wanted to talk about enhancing recharge in the Eastside. I don't think there will be downstream deprivation. If we're looking at capturing runoff, we could also do things like controlled burns and grazing that manage invasive species and that could hopefully help with fires in our community.	Comment received.	Meeting comment - noted.
110					Special Meeting	10/13/2020	**Chris Bunn**	Will we have a precise number of irrigated acreage in the Eastside? We will need it.	DW: I think we will have a reasonable number. We will be using the county estimate and we will probably continue to use them. I don't think we can get an airtight number. What we can do is say this is what we have now because this number will likely fluctuate.	Meeting comment - noted.
111					Meeting	12/2/2020	**Steve McIntyre**	Re: Water Quality and Water Levels Relationship Update: Is the yellow circle the old cattle yard? Which is pretty much a nitrate farm. We have been working on nitrates for a while. We try to get clean water to people who want it. Ag practices have advanced and what we are currently doing should be able to help nitrate concentrations in the future. I think water levels are related to nitrate concentrations. For example, at the Wild Horse truck stop, there are shallow wells and in the past, during the drought, they had high N concentrations. When the groundwater was recharged, the concentrations decreased.	DW: We are not addressing N sources here. Just a simple image of GWL and Nitrate.	Meeting comment - noted.
112					Meeting	12/2/2020	**Kay Mercer**	I'm surprised by the charts. Are these monitoring wells, or does it include shallow drinking water wells? Also, confirming that where we have alluvial influences, the nitrogen concentrations fluctuate relative to groundwater elevations.	DW: This is using all ILRP wells, so it is combination of well types. I will double check.	Meeting comment - noted.

113					Meeting	12/2/2020	**James Sang**	If the nitrate loading is caused by ag, what would be the solutions for that? I heard of studies in Santa Cruz where they used wood bark to absorb nitrate.	DW: The studies you are referring to are run by Andy Fisher. We're not looking at remediation of nitrate which the ILRP is in charge of. We are looking at the question of whether we need to set groundwater elevations at a certain level that won't degrade water quality further. We don't have land use authority to tell people how to manage their land.	Meeting comment - noted.
114					Meeting	12/2/2020	**Robin Lee**	There has been conversion of dry land ag and grazing to irrigated lands. The more irrigated lands, then the more nitrate applied and more nitrate in the GW. There was probably a lot of wells that were drilled and wells are a pathway for pollutants to travel. I don't see how we can stay away from land use in this GSP. So there is such a cause and effect in everything that is done, I don't see how we can eliminate land use as a probable cause. There's a link there.	Abby Ostovar: We're going to get into projects in a bit so you'll see how land use is a big constraint. Although, we don't have land use authority we can partner with the County or other agencies. Or we could think of incentives for fallowing.	Meeting comment - noted.
115					Meeting	12/2/2020	**Chris Bunn**	In the Eastside, we definitely have not increased irrigated ag land acreage, and not in the recent past.	Comment received.	Meeting comment - noted.
116					Meeting	12/2/2020	**Robin Lee**	The Santa Rita area has had an immense increase in irrigated land, from what I have seen the north of the eastside has had an increase.	Comment received.	Meeting comment - noted.
117					Meeting	12/2/2020	**Steve McIntyre**	I want to confirm what Chris Bunn said. The Eastside has not had significant ag land developed.	Comment received.	Meeting comment - noted.
118					Meeting	12/2/2020	**Kay Mercer**	I think you should look at drinking water separately. The ILRP assumes that the shallow groundwaters have more nitrate.	DW: We average all the data for a given year, GWL for all wells. So at no point are we comparing shallow to deep groundwater, we are looking at relatively high and low years.	Meeting comment - noted.
119					Meeting	12/2/2020	**Kay Mercer**	I don't think we see that much variability in the Eastside, so I'm not sure why this is happening. How meaningful is this data, does this really relate the depth of nitrate concentrations and GWL if you aren't looking at the depth of the well?	DW: What this data relates to is the SMC, would setting the SMC for GWL at a certain level significantly change the concentration in these wells? And what we conclude is that we don't have conclusive evidence to confirm that.	Meeting comment - noted.
120					Meeting	12/2/2020	**Eric Tynan**	Is this legacy nitrate use?	DW: We don't know because we didn't try to assess that.	Meeting comment - noted.
121					Meeting	12/2/2020	**Norm Groot**	It sounds to me that what we are talking about is that pollution dilution is occurring when GWL are higher?	DW: I think that's what the question was. I don't think this data is definitive to put a quantitative number on that GWL.	Meeting comment - noted.
122					Meeting	12/2/2020	**Robin Lee**	Over time if remediation included fallowing of land and then we had less nitrate applied over time. Then the fallowing would cause GWL to go up and nitrates would go down. It looks like they are linked.	Comment received.	Meeting comment - noted.
123					Meeting	12/2/2020	**Norm Groot**	I don’t think there is a direct correlation between fallowing land and decreasing nitrate levels in the GW. I don't think you can make that correlation because of legacy loading issues.	Comment received.	Meeting comment - noted.
124					Meeting	12/2/2020	**Robin Lee**	I think I would feel better about making this decision when we see projects and modeling results. It's all about money and how much we want to pay to get to our objective.	Comment received.	Meeting comment - noted.
125					Meeting	12/2/2020	**Ross Clark**	We are setting an objective and minimum bar and the difference between them is our "cushion" . We want a big enough cushion to allow for drought, variability and ag and urban practices and lag time between action and response. I appreciate Robin Lee's comments about setting these MT and MO would direct our focus on certain projects over others. Some projects have less certainty and may require longer time periods to confirm effectiveness.	Comment received.	Meeting comment - noted.

126					Meeting	12/2/2020	**Steve McIntyre**	I think it's important to recognize that these aren't carved in stone. We can come back to change them as we establish projects. I think establishing MT to 2015 and MO to 2010 so that we have something to start comparing projects and management actions. Then ask the question, do you want a larger or smaller buffer?	DW: The advantage of a large buffer is there's less risk if you manage toward your objective. For a small buffer you don't have to take as much action to get to the MO. Let's say we set the MT and we don't want to get below the MT after a three-year dought, we could look at historically how much water levels have dropped in three year drought and then add that to the MT and then that would be our MO. That's one way to think about it.	Meeting comment - noted.
127					Meeting	12/2/2020	**Chris Bunn**	I was relieved to hear Derrik's response to flexibility. I find myself reluctant to commit to anything on this until we look at projects and management actions and how much they are going to cost.	Abby Ostovar: We can circle back to this.	Meeting comment - noted.
128					Meeting	12/2/2020	**Chris Bunn**	I like Steve McIntyre's proposal with the idea of the three-year drought mentioned before.	Abby Ostovar: So basically at the end of the three-year drought you don't want to go below 2015.	Meeting comment - noted.
129					Meeting	12/2/2020	**Steve McIntyre**	You set 2015 as the MT, add three years of the decline with the drought. Use the 2015 as your bottom and then go up for the MO.	Comment received.	Meeting comment - noted.
130					Meeting	12/2/2020	**Chris Bunn**	Is there any possibility of a secondary MT that would be triggered by X years of drought?	DW: I haven't heard of this but if the future turns out different than our assumptions, we can change the MT and MO. Changing MT and MO requires public input, but it is completely doable. Abby Ostovar: We can set the MT and MO as you suggested, and we can also look at how drought will affect.	Meeting comment - noted.
131					Meeting	12/2/2020	**Horacio Amezquita**	Can we get the volume of water that is represented between different GWL because we are going to need it to see what projects we have to implement?	DW: That is true, and to be able to size the projects. Abby Ostovar: We will have a water budget and the projects are trying to get to sustainability across the 6 indicators.	Meeting comment - noted.
132					Meeting	12/2/2020	**Horacio Amezquita**	I understand but we need to have an idea of the amount of water we have been over-pumping over the years. Hopefully, we can get it in the water budget.	Abby Ostovar: In a perfect world, we would get everything in a linear fashion. But we're still waiting on that. And we won't finalize projects until we have the water budget.	Meeting comment - noted.
133					Meeting	12/2/2020	**Kay Mercer**	I like the concept of looking at a three-year drought. I think it would be helpful for the committee to see that visually. Your goal is to say the GW is sustainable if the drinking water wells don't go dry. Is that correct? You're setting the MT for GWL to protect drinking water water wells?	Abby Ostovar: Six sustainability indicators. The SMC for GWLs to protect shallow domestic wells is correct.	Meeting comment - noted.
134					Meeting	12/2/2020	**Kay Mercer**	I think it would be helpful to know how many domestic wells went dry below 2015 WLs.	Abby Ostovar: We would love to have that but there's no one who collects that information.	Meeting comment - noted.
135					Meeting	12/2/2020	**Robin Lee**	The Eastside subbasin is in overdraft now. So to get to sustainability, we can't continue to do what we are doing now, as far as pumping water. Is that a good assumption?	Abby Ostovar: Kind of, yes, if pumping is all you are looking at. The other thing you could do is increase recharge or bring more water into the subbasin.	Meeting comment - noted.
136					Meeting	12/2/2020	**Robin Lee**	But we are looking at right now. We aren't doing projects now and it isn't raining. We are in overdraft. If we continue, it will get worse. How does that apply to the MT. I would put MT where we are now. We can't get any worse.	Abby Ostovar: You can set the MT lower. Overdraft is basin wide. GWL vary spatially across the subbasin. We don't have 2020 on the graph, but I think they would be higher than 2015.	Meeting comment - noted.
137					Meeting	12/2/2020	**Robin Lee**	Why would you want to make the MT lower than where we currently are? If you extrapolate the pattern we are going to get worse. In order to hold the line, we would have to have projects.	Abby Ostovar: 2015 addresses that there will be droughts in the future but the committee decides where to set the SMC.	Meeting comment - noted.
138					Meeting	12/2/2020	**Steve McIntyre**	I think it would be interesting to see the 2019 data. 2015 was in the middle of a drought. I could bet that the 2019 WLs have rebounded. We don't want to go back to 2015 levels.	Comment received.	Meeting comment - noted.
139					Meeting	12/2/2020	**Colby Pereira**	I wanted to echo Steve's comments. I think we need to give ourselves wiggle room for climate change and weather related conditions. I would like to set some conservative benchmarks and let our projects and management actions develop to keep us above the MT.	Comment received.	Meeting comment - noted.

140					Meeting	12/2/2020	**Chris Bunn**	Groundwater Level SMC: Measurable Objective set at 1999, and the Minimum Threshold set at 2015.	Motion was passed by Committee and will be incorporated into GSP.	The Measurable Objective and Minimum Threshold will be incorporated into Groundwater Level SMC.
141					Meeting	12/2/2020	**Robin Lee**	Re: Projects and Management Action Discussion: A lot of the projects are rain dependent. The scalping plant would give water every day. It is the most dependable. And it's less money than Gabilan Creek and Salinas River diversion projects. Water doesn't have to be transported anywhere, we are using local water to recharge our aquifers. I'm also supportive of the projects that follow the natural cycles. If we imitate the natural processes, we'll have more success at less cost.	Comment received.	Meeting comment - noted.
142					Meeting	12/2/2020	**Ross Clark**	We want to get to sustainability in a way that is sustainable for farmers, landowners and the community, so cost is a factor. There are certain levels of certainty that we get from engineering projects, but usually at a higher cost. There are other projects like recharge that are more uncertain, but lower cost and there are partners that can bring resources to the table. Is there a way to look at a temporal priority? Pursue lower cost projects for the short term and invest more money and achieve more certainty if we need to. It's a question for everyone. Do we need to pick the most certain project now? Or could we invest more money as we see if the project is working?	Abby Ostovar: DWR wants to see that we have the tools to reach sustainability and they are benchmarking that 20 years out. We will do our best to estimate project yields, but it will be up to group to assess your level of comfort with project certainty.	Meeting comment - noted.
143					Meeting	12/2/2020	**Chris Bunn**	It's difficult to speak about these comprehensively without more details about the specific projects, costs and yields. Re: Extraction from 180/400 Project: You actually wouldn't have to cross the river but you would have to go under the 101. It could be a dual subbasin project because it could also serve the 180/400 ft aquifer. I expect the project will be expensive to move water to various places within the subbasin. Another point, we need to look at comprehensive river management. If we could clean the river of overgrowth, we could get better percolation, especially at Somavia Road. Re: the scalping plant idea, I like the concept, but it will take water away from the CSIP farmers and that isn't a good idea.	Abby Ostovar: I look forward to comments on the data packet	Meeting comment - noted.

144					Meeting	12/2/2020	**Colby Pereira**	When we talk increased recharge, I want to echo Chris' idea of river maintenance. That will have a benefit for the whole valley. Ag has been very proactive with BMPs pre-SGMA; we don't want to set unreasonable standards for future BMPs, there needs to be collaboration. I think the CSIP expansion would benefit both 180/400, Eastside subbasin and subbasins futher to the south. I think the 11043 diversion would help, too, but it has a significant price tag. We definitely don't want to keep leaving it on the table because our allotment could be cut again. We can do something with it, we should investigate other solutions with that water.	Comment received.	Meeting comment - noted.
145					Meeting	12/2/2020	**Caroline Chapin**	I'm not a fan of the scalping plant idea because we'd have to fight Monterey One Water because there is limited recycled water. Also very expensive. I think we should recharge overland flow. Continuing to investigate recharge projects would be high on my list.	Comment received.	Meeting comment - noted.
146					Meeting	12/2/2020	**Brenda Granillo**	I wanted to state the importance for us to have a variety of projects. I would advocate for the Salinas scalping plant. There will be new growth areas and I think there's potential to have this water offset the pumping as Salinas grows. Also look at pumping controls and reduction to benefit the Eastside subbasin.	Comment received.	Meeting comment - noted.
147					Meeting	12/2/2020	**Brenda Granillo**	I can let you know that Cal Water was pumping 19,000 AFY of water in 2013. With restrictions in place we went to 14,000 AFY and now we average 16-17,000 AF of water per year. And we did have to extend two of our wells during drought due to GWL dropping.	Comment received.	Meeting comment - noted.
148					Meeting	12/2/2020	**Horacio Amezquita**	I was wondering if studies have been done to see if the Gabilan mountains could be used to hold water and release it when we need it?	Abby Ostovar: I haven't seen anything like this. But we could dig around some more.	Meeting comment - noted.
149					Meeting	12/2/2020	**James Sang**	I wanted to explain my idea about the swails. But instead, I want to present the idea of who to make this area rain more. There's a relationship between soil moisture and precipitation. If we can hold the moisture in the soils long enough to get the humidity higher from moisture from plants and the ground, as the winds go up the hillslope we could get precipitation at the right time.	Comment received.	Meeting comment - noted.
150					Meeting	12/2/2020	**Robin Lee**	I know in Hawaii there was less rainfall when they deforested. We are on the wet side of the Gabilan, so I think the vegetation does have an effect on the amount of precipitation. There's definitely a correlation.	Comment received.	Meeting comment - noted.
151					Meeting	2/3/2021	**Colby Pereira**	With regard to land use pie chart, does that align well with the percentages of land use in the funding model for the GSA as a whole?	Abby Ostovar: This is the same data from the GSP in Chapter 3 from the Monterey County Assessor's office, but for example vacant land was separated. If it was near a city it would go toward urban growth and if it's far from a city then it was classified as dormant land because it would like go to irrigated ag in the future. DW: The data in the GSP matches what is used in the funding structure.	Meeting comment - noted.
152					Meeting	2/3/2021	**Chris Bunn**	It is clear that whatever happens going forward, ag users will bear the brunt of the changes and cost. I think we need to reach out to the farmers in the Eastside for their opinion. I'm uncomfortable opining on this in the absence of hearing from the larger Eastside farming community.	Abby Ostovar: What process should we follow for getting that input?	Meeting comment - noted.
153					Meeting	2/3/2021	**Chris Bunn**	Reach out to SBAWA, and Norm. It's not a lot of people but it's important to reach out to them.	Comment received.	Meeting comment - noted.

154					Meeting	2/3/2021	**Colby Pereira**	Going through SBAWA would be the best approach.	Abby Ostovar: Ultimately, this committee gives us direction, but maybe we could reach out to them and then bring that input back to this committee. Donna: Colby and Chris, would you consolidate some of those views for us? Colby: SBAWA could submit comments directly, or we could listen and bring back feedback we are hearing. Abby: Donna and Emily, we can work with Colby and Chris to come up with an adequate approach. We will revisit this topic in the future.	Meeting comment - noted.
155					Meeting	2/3/2021	**Robin Lee**	*Re: Municipal growth* : The idea of not allocating water to the cities is ridiculous, so I would throw that one out right away. I would go with the historical pumping approach, but the city is growing and that will have to be taken into consideration. It seems that urban uses is a minor portion of the whole pie and they are conserving. We have to talk to farmers and developers to see what their planning horizons are looking like for future development.	Abby Ostovar: You're saying that the historical approach should be used as the standard and then look at the future growth rate and add that in as a "set-aside" for municipal growth?	Meeting comment - noted.
156					Meeting	2/3/2021	**Robin Lee**	Yes, I don't see why they would need more water than what they use currently in areas that are already built out. So current use, would be a good number to have, if anything, that number will go down as efficiencies go up. If current numbers are considered a historical figure, then yes.	Comment received.	Meeting comment - noted.
157					Meeting	2/3/2021	**Marc Bloom**	I agree with most of what Robin said. Historical and current use will give you a decent estimate of need for the future growth. I'm confused about the "set aside" term because the new growth area will be replacing irrigated ag. So residential and light commercial development will use less water anyhow. Development now is planned to be efficient, and that needs to be accounted for. My suggestion is to have allocations adjusted as growth occurs. Urban users are conserving, but Ag is doing a good job conserving, too.	Comment received.	Meeting comment - noted.
158					Meeting	2/3/2021	**Robin Lee**	Urban development is required to use low-impact development. In the future growth area, they are looking into things like detention basins that will percolate. So low impact development is a big part of that.	Comment received.	Meeting comment - noted.
159					Meeting	2/3/2021	**Robin Lee**	It depends on what the builders say about their rate of development. There is a housing shortage and I think development will happen quickly, so I would say a set aside, but that would need to be based on what the developers are saying about growth.	Abby Ostovar: I'm hearing everyone say that growth will occur in municipalities and we need to be able to meet [that demand] with future water.	Meeting comment - noted.
160					Meeting	2/3/2021	**Chris Bunn**	The land use issue aside, if somebody choses to convert their land from non-irrigated to irrigated you can't stop them from doing that. The allocation should be flexible enough to account for that.	Abby Ostovar: That's what Valerie said because we don't have land use authority and this is an allocation which should not conflict with anyone's water rights.	Meeting comment - noted.
161					Meeting	2/3/2021	**Robin Lee**	There was a comment from the questionnaire that dormant land is not wasted land. I think we should call dormant land something else. I think it's the wrong connotation. I think something like non-irrigated is better. Also, how can you bring more irrigated land when we are already overusing water? It seems like the agency has the resources to fallow land to get us to sustainability. I'm not sure how this goes with land use but in my mind I can't separate land use and getting to sustainability. Fallowing land is the best tool we have right now. We should keep dormant land dormant.	Abby Ostovar: I think the challenge in creating a fallowing program is that we can't essentially tell a land user what to do with their land. Ideally we want the approach we take to be legal.	Meeting comment - noted.

162					Meeting	2/3/2021	**Robin Lee**	I'm just saying dangle some carrots in front of the already dormant land to keep it dormant. I'm not saying to take people's land.	DW: I want to address the dormant land issue because part of this is how you implement the allocations. If we do a fee structure then we're not actually having an impact on land use. It's pretty much saying that some land is more expensive to irrigate than other lands. I just want to point out that not having an allocation for dormant land is not preventing that land from being irrigated, it will just make irrigating that land more expensive. We don't have land use authority, but we do have water use authority, and how you bring those two together, we will have to be very cautious about.	Meeting comment - noted.
163					Meeting	2/3/2021	**Steve McIntyre**	I wanted to point out to the non-farmers in the group that a lot of grazing land has been converted to vineyards. Vineyards will use 1/3 of the water that other given crops will use on an acre. If we work hard at projects and management actions, in particular conservation, there could be enough water and avoid allocations. I think fallowing is a last resort. Let's do this through management actions and projects.	Comment received.	Meeting comment - noted.
164					Meeting	2/3/2021	**Marc Bloom**	As the largest urban water supplier in the subbasin, we are not supporting pumping allocations at this time. We understand that it may come into play at some point and if so, we would like to see the historical approach. We do support projects that will get us to sustainability.	Comment received.	Meeting comment - noted.
165					Meeting	2/3/2021	**Robin Lee**	I think allocations are imminent because of climate change. I would say that allocations might have to be used sooner than later since we have a lot of extended dry periods. I think we can't have projects that are dependent on rainwater alleviate the need for allocations.	Comment received.	Meeting comment - noted.
166					Meeting	2/3/2021	**Chris Bunn**	I'm not a fan of allocations, either. However, the necessary metering component is needed because this will help with getting precise data and fees. I think we should be project oriented. Pumping allocations are a last ditch response. Even in dry years, there is water here.	Comment received.	Meeting comment - noted.
167					Meeting	2/3/2021	**Caroline Chapin**	I agree with Chris; I'm uncomfortable with allocations. I work with rainwater and we just let a lot of water run into the ocean. I think we should focus on projects that help us capture and recharge water.	Comment received.	Meeting comment - noted.
168					Meeting	2/3/2021	**Colby Pereira**	I agree with comments from Marc, Chris, and Caroline.	Comment received.	Meeting comment - noted.
169					Meeting	2/3/2021	**Robin Lee**	In order to have developments, you need to prove you have water, on the flip side shouldn't ag have the same requirement? If we're all paying the price for overdraft and seawater intrusion, should ag be required to prove their water will have a sustainable yield? Is that language valid for our GSP?	DW: The requirements that Robin refers to are state laws and we don't have that type of authority for those types of requirements.	Meeting comment - noted.
170					Meeting	2/3/2021	**Caroline Chapin**	I understand the usefulness of allocations for funding. I think I can support this being a low-priority tool in our toolbox.	Comment received.	Meeting comment - noted.
171					Meeting	2/3/2021	**Marc Bloom**	I agree with Caroline. My comment was that we don't support pumping allocations right now, but we are open to revisit the topic. I do understand that at some point it may become necessary, so maybe we can state that in our GSP.	Comment received.	Meeting comment - noted.
172					Meeting	2/3/2021	**Chris Bunn**	I think the allocations should be the ugly brutal tool in the box that we don't want to use. The priority should be given to the supply projects.	Comment received.	Meeting comment - noted.
173					Meeting	2/3/2021	**Ross Clark**	I support this approach as well, but cost considerations might bring us back to this discussion at a later date.	Comment received.	Meeting comment - noted.
174					Meeting	2/3/2021	**Horacio Amezquita**	I think we should have water allocations in the toolbox because we never know when an extensive drought will come up.	Comment received.	Meeting comment - noted.
175					Meeting	2/3/2021	**Robin Lee**	When we had the drought a few years ago the state asked urban pumpers to reduce by 15%. We have to request Ag to do the same. That should be a tool in the toolbox.	Comment received.	Meeting comment - noted.
176					Meeting	2/3/2021	**Colby Pereira**	I agree with keeping [pumping allocations] in [the GSP], but only as a last resort scenario.	Comment received.	Meeting comment - noted.

177					Meeting	2/3/2021	**Steve McIntyre**	I agree with all members that it needs to be a last resort. In a prolonged drought, one management action we could take is monitoring our groundwater levels. If we have X% of wells below the minimum threshold, we can propose that everyone reduce their pumping by 10% until water levels rose up again and got closer to the measurable objective.	Comment received.	Meeting comment - noted.
178					Meeting	4/7/2021	**Robin Lee**	I'm wondering how this is all going to work since we're going to have drier conditions. I'm curious about how they're getting their data. Our trend is drier, not wetter, how would that work for future modeling?	DW: The trend DWR is predicting is warmer and wetter. The wetter gives us more recharge in the winter but the drier leads to more evapotranspiration. These are two competing factors. For the last decade we have had fairly dry weather, this is implemented in the model so we're accounting for wet years and dry years going forward. The only question is if the DWR prediction is accurate and we are using their most likely situation. A lot of people are questioning this but this is the best one we have right now and most likely scenario.	Meeting comment - noted.
179					Meeting	4/7/2021	**Ross Clark**	We have done some of the downscaling of the model too and we see that it will be wetter, but with more inconsistent rainfall. Can we support infiltration during short intense rain events? Our models suggests that flooding will be caused downstream. We need to take advantage of rainfall and try to recharge as much of it as we can.	Comment received.	Meeting comment - noted.
180					Meeting	4/7/2021	**Horacio Amezquita**	Why do you think there's such a difference in the sustainable yield values you presented?	DW: We think the model predicted more drawdown that has been historically seen so the model is overestimating the storage that we are losing. The previous estimates were approximated by stitching different things together from different studies. This model uses different tools than those in previous estimates but assesses things more completely.	Meeting comment - noted.
181					Meeting	4/7/2021	**Horacio Amezquita**	If everyone would report their extraction, would we have better numbers?	DW: We have most of the large wells accounted for so metering the small wells won't change this number much.	Meeting comment - noted.
182					Meeting	4/7/2021	**Chris Bunn**	How reliable do you think the GEMS data are?	DW: The WRA thinks the GEMS data is quite reliable. They say 90-95% of pumping is reported. People report a large percentage of the pumping in the Salinas Valley to GEMS. I don't have any evidence that this data is unreliable.	Meeting comment - noted.
183					Meeting	4/7/2021	**Chris Bunn**	Is the data accurate? Is there an acceptable margin of error that you have set? I'd really want more certainty on this.	Comment received.	Meeting comment - noted.
184					Meeting	4/7/2021	**Chris Bunn**	The imperative from SGMA that we need to pump within our sustainable yield can be problematic because it could be at the expense of our neighbor.	DW: The law says that you can't prevent your neighbor from reaching sustainability and that we can't have any undesirable results. We are in a good position in the Salinas Valley since we are working with our neighboring subbasins. But you are correct, it is an issue all through the state.	Meeting comment - noted.
185					Meeting	4/7/2021	**Robin Lee**	Do we have enough data to have an accurate prediction of future pumping?	DW: We have inherited this model from the USGS and we are now trying to take it apart and figure out how accurate it is. The map with the dots shows the calibration points, if we calibrated accurately to all of them then it would be an accurate model. That doesn't mean that we can't use any additional data, but as far as developing an accurate model for the Eastside, I think we have enough data.	Meeting comment - noted.
186					Meeting	4/7/2021	**Heather Lukacs**	What extent does the model incorporate the issues that Ross Clark brought up about higher precipitation but less infiltration and high runoff? What is the time step?	DW: The model does calculate these things but it misses small timeframes. It looks at the larger scale, but there are inaccuracies in the model when looking at day to day changes. DW: Two week time step and the stress period is monthly.	Meeting comment - noted.
187					Meeting	4/7/2021	**Robin Lee**	It would help me to see a spreadsheet with the projects listed with the cost and acre-feet.	Abby Ostovar: Here it is.	Meeting comment - noted.

188					Meeting	4/7/2021	**Robin Lee**	It seems like the quickest and least expensive is the floodplain restoration and stormwater recharge. It's a multi-benefit project. The other projects are dependent on how much rain we will get and that's unpredictable.	Abby Ostovar: I should comment that this is a preliminary scoping of the projects we are also trying to do model runs. This is the total amount of water that could be captured, not what would actually be recharged. The model will help us analyze the potential recharge.	Meeting comment - noted.
189					Meeting	4/7/2021	**Ross Clark**	I sent a report that was done by UC Davis, Coop Extension and City of Salinas about using vegetation in agriculture drain furrows during the winter. I think it got lost but I think it would fit in into the overland flow category and could be a low cost strategy.	Comment received.	Meeting comment - noted.
190					Meeting	4/7/2021	**Chris Bunn**	[Re: planting furrows]: I can't speak for all farmers and whether they would be willing to do that but it won't be cheap and will impact farming practices and timing.	Comment received.	Meeting comment - noted.
191					Meeting	4/7/2021	**Ross Clark**	I guess we would have to put this into context in comparison to taking land out of production for recharge basin.	Comment received.	Meeting comment - noted.
192					Meeting	4/7/2021	**Chris Bunn**	I'm open for discussion, but taking land out of production will also need to take into account replacing rent costs and paying workers upcharge for what you could make off the ground and other moving parts.	Comment received.	Meeting comment - noted.
193					Meeting	4/7/2021	**Ross Clark**	As Derrik showed, infiltration is the major input to groundwater, it would be great to investigate recharge options without taking land out of production. I think it got into the Ag BMPs but the other Ag BMPS focus on a reduction of irrigation, where this is focused on stormwater infiltration enhancements. Maybe that is added to the Ag BMPs, or we could add another line to the aquifer recharge category.	Comment received.	Meeting comment - noted.
194					Meeting	4/7/2021	**Ross Clark**	For the floodplain restoration we can find grants to help offset costs, and we are happy to help out and find matching funds. I also had a question about fallowing, we should do this in conjunction with flood plain restoration to minimize impacts on Ag land, while reducing pumping and increasing infiltration. And then finally about Salinas scalping plant, is this comparable to sending the water to Monterey One Water through extending the purple pipes.	Comment received.	Meeting comment - noted.
195					Meeting	4/7/2021	**Horacio Amezquita**	It seems like we need to 21,000 acre-feet reduces from current pumping and it seems like no one will stop pumping, so we need to figure out a way to find this water. All of this money to pay for these projects, will that come from the Eastside basin? Will there be funding from state or federal?	Abby Ostovar: Yes, the next thing we need to talk about is funding strategies. Yes, we need to figure out how to fund these projects. We don't need to show that we have the money but we need to show that we have a plan. Abby Ostovar: There will be SGMA funding but it will be very competitive.	Meeting comment - noted.
196					Meeting	4/7/2021	**Horacio Amezquita**	It would be a good idea to have an estimate of individual cost so we can know how much we have to pay.	Abby Ostovar: Part of the reason why we haven't done this is because different users will benefit differently and thus will or can pay according to benefit. It's a few steps down the road.	Meeting comment - noted.
197					Meeting	4/7/2021	**Horacio Amezquita**	Have you looked into holding water upstream at high elevations and releasing it when we need it?	Abby Ostovar: We haven't looked into any reservoirs. If you don't have high flows all the time then they are pretty costly projects. Emily Gardner: Part of that concept could be incorporated in the floodplain restoration concept with check dams or other ways to slow water.	Meeting comment - noted.
198					Meeting	4/7/2021	**Horacio Amezquita**	I've seen small reservoirs that have been built with a Caterpillar but the government agencies don't allow us to do that. It's not expensive and holding water at high elevations and releasing it when we need it could help us.	Comment received.	Meeting comment - noted.

199					Meeting	4/7/2021	**Chris Bunn**	It's clear that the vast majority of cost will be borne by the farm community. So I think it would be wise to focus on the multi-subbasin projects to leverage a larger pool of fees with partners. Could we add projects to this list, one would be a slight innovation on the extraction wall barrier project in the 180/400 with the tweak of treating the extracted brackish water into drinking water. It could be a project for 180/400 and Monterey too. The second one would be looking carefully at ocean desalination at Moss Landing. That would be another multi-subbasin project that will benefit multiple cities and the cost could be amortized better.	Abby Ostovar: We're a little late in the game to add projects, but thank you for brainstorming. We could tie in similar projects from other subbasins that are related to the ones you suggested.	Meeting comment - noted.
200					Meeting	4/7/2021	**Chris Bunn**	Some of the other subbasins have added winter release and ASR wells as projects. There might be some overlap with what I said about extraction barriers and treating brackish water there too.	Abby Ostovar: We can look into this when we make the roadmap to see how all these projects can fit together.	Meeting comment - noted.
201					Meeting	4/7/2021	**Robin Lee**	The managed aquifer recharge and overland flow you mentioned is what they're doing in Pajaro? You have a comparison cost from them and it would be good to see that. Are they using cover cropping in those projects?	Abby Ostovar: Yes, that's where I'm planning to get the cost estimates from.	Meeting comment - noted.
202					Meeting	4/7/2021	**Robin Lee**	We need to see the cost analysis done, comparing the cost of land if it is no longer farmed compared to the cost of building a project. If a farmer says this is going to cost them money then we need to see that cost so we can compare projects.	Emily Gardner: I think you're asking a question that came up in the Advisory Committee meeting about more in depth cost/benefit analysis, and also with farming there are socioeconomic cost that are not taken into account here. We will have to do that analysis in the future.	Meeting comment - noted.
203					Meeting	4/7/2021	**Steve McIntyre**	I want to emphasize what Chris Bunn was talking about. All of our vineyards are cover cropped. It's not going to make a large enough difference. If the 180/400 already has the barrier project listed and the ES can benefit, then I would strongly support adding it to the Eastside projects. The barrier project could provide supply water to Castroville or Salinas and help with seawater intrusion. This can cover 11K of the water in overdraft, leaving 10K that can be solved with other easier actions. For example, we could change the crops farmed or reduce rotations to reduce farming extraction during dry years, and in wet years we could go back to regular farming schedules and cycles.	Comment received.	Meeting comment - noted.
204					Meeting	4/7/2021	**James Sang**	For the managed aquifer recharge projects, is that water coming from what the growers have used?	Abby Ostovar: Good question. Some would come off of agriculture fields, but we would have to consider the water quality regulations before returning agricultural runoff to the ground. Generally, this is for overland flow before it gets into the stream.	Meeting comment - noted.
205					Meeting	4/7/2021	**James Sang**	We need to consider the cost here. If we add them all together, it's like $200 million. Would these projects work at all if we went back to the 2015 scenario?	Abby Ostovar: Not all years will be dry like 2015, there will be fluctuation of wet and dry years. The Eastside is in overdraft so there isn't any quick and easy projects that will fix overdraft.	Meeting comment - noted.
206					Meeting	4/7/2021	**James Sang**	Have you thought of projects that increase rainfall?	Abby Ostovar: No, we have not.	Meeting comment - noted.
207					Meeting	4/7/2021	**Chris Bunn**	I just want to reiterate the farmers will have to pay the majority of these costs, so we should all be considerate of using others' money.	Comment received.	Meeting comment - noted.
208					Meeting	4/7/2021	**Robin Lee**	Re: pumping management: It's an option so we should include it, DWR doesn't want us to look at things that are not included in the GSP. We do want things that we can do in a shorter time frame. We can do pumping management in the near future. We need tools we can use in the next few years.	Comment received.	Meeting comment - noted.
209					Meeting	4/7/2021	**Chris Bunn**	Re: Pumping management: I would suggest to add it similar to how the Forebay Subbasin set it up with triggers that institute the TAC who would hammer out demand management. This should be the last tool in the toolbox.	Abby Ostovar: A difference between Forebay and Eastside is that Forebay is close to sustainability now.	Meeting comment - noted.
210					Meeting	4/7/2021	**Chris Bunn**	Yes, but we should still be optimistic that the projects and management actions we have here could help us before pumping reductions.	Emily Gardner: If we want to keep this on the table, we should come up with a Technical Advisory Committee that will develop triggers after Project X, Y, and Z are explored.	Meeting comment - noted.

211					Meeting	4/7/2021	**Robin Lee**	Re: pumping management: If we were in a drought again then this should be considered, if we get into a drought that is extensive.	Comment received.	Meeting comment - noted.
212					Meeting	4/7/2021	**Robin Lee**	Is there a way to get a presentation specifically on natural methods, such as floodplain restoration that are multi-beneficial? You could present what Pajaro is doing.	Comment received.	Meeting comment - noted.
213					Meeting	4/7/2021	**Horacio Amezquita**	I've been thinking about what Steve McIntyre and Chris Bunn said. Is it possible to get a half page on the extraction barrier project benefits for the Eastside?	Emily Gardner: We will include the concepts in the draft chapter for your review.	Meeting comment - noted.
214					Meeting	4/7/2021	**James Sang**	I want to see if swells or trenches are possible for this area, also the idea of making it rain more in this area. I would like to see some research done to see if any of these are feasible or not.	Emily Gardner: Thanks James, please email that to us.	Meeting comment - noted.
215					Email	4/12/2021	**James Sang**	I wanted to present some potential agenda items.	Comment received.	Point #1 was considered throughout the Salinas Valley and it is incorporated in projects for other Subbasins.
								1. Can rainfall harvesting through swales refill wells and increase groundwater and water aquifers?		
								Reference a: You Tube video (Harvesting Water Naturally with Swales by Urban Farmer Curtis Stone)		Point #2 has been incorporated into the overland flow MAR project which was modeled on the Pajaro Valley project noted.
								Reference b: You Tube video (Recharging A Well Part II -John Kaisner The Natural Farmer)		
								Reference c: You Tube video (Swales on Contour can Drought -proof Gardens, Farms and Pastures with Water Harvested Passively by Edible Forest Gardens)		
								Reference d: You Tube Video (Deep Soil Ripping for Water Conservation by Megan Clayton)		
								Reference e: "Deep Soil Ripping as an Effective and Affordable Water Capture Tool written by Amanda C. Krause, Megan K. Clayton, ...et al" Please google search article.		
								2. Can you make a presentation on what UC Santa Cruz is doing to recharge their wells? This is what Robin Lee wanted.		
								Reference a. You Tube video (Enhancing Groundwater Recharge in the Pajaro Valley by California Department of Food and Agriculture)		
								I believe that swales and subsoil plowing can recharge a farmers well, groundwater and aquifers. This is a cheap and easy way to help every farmer and landowner have a plentiful supply of water. This idea will solve California's goals of recharging water aquifers and holding back salt water intrusion into our coastal lands.		
								Can you show this to all interested parties?		

216	6				Email	4/23/2021	**MCWRA**	Operations of the San Antonio and Nacimiento Reservoirs applies to the Salinas Valley Operational Model, unless the intent is to describe that historical hydrologic data in the SVIHM would reflect MCWRA reservoir operations.	Comment received.	The SVIHM uses historical hydrologic data which reflects how MCWRA operated the Reservoirs in the past.
								Water Year 2016 was preceded by multiple dry or dry normal years. Has the impact of that on the chosen “current WY” budget been explored? Or should that at least be mentioned here for context?		Noted. 2016 is preceded by multiple dry years, however, current water budgets are merely reported and are not used for managing the GSP.
								While this is true that the SVIHM does not simulate domestic pumping, it seems unlikely that all of the annual variability is due to domestic pumping. Consider mentioning other sources of uncertainty.		Noted. The text referring to domestic pumping as the cause of annual variability was removed from the GSP.
								The SRDF diversion rate (18cfs) used for the projected water budget is much lower than the 36 cfs that MCWRA targets for availability at the SRDF, and which can be diverted during maximum demands. Rates lower than 20 cfs present operational issues with getting water to the impoundment.		The SRDF diversion rate used in the SVOM (18cfs) is lower than what MCWRA targets (36 cfs), this is something that will be fixed in the future.
217					Meeting	6/2/2021	**Chris Bunn**	[Re: model] In acre-feet, what is an acceptable margin of error?	DW: We don't have an acre-feet margin of error, what we are trying to do is figure out if something will change our decision. Let's say we are at a difference of a few 1,000 acre-feet, that shouldn't be enough to make us change our decision because that's within the margin of error of the model. We wouldn't change our management approach for that, but if the difference between the model and GEMS data is a larger order of magnitude than 1,000 we might want to change our approach.	Meeting comment - noted.
218					Meeting	6/2/2021	**Tamara Voss**	Clarification on why the subarea designation can change over time, it's because the well locations are better understood. Over the years we get better well locations, it's not that the subarea extent is changing.	Comment received.	Meeting comment - noted.
219					Meeting	6/2/2021	**Ross Clark**	[Re: Storage SMC]: What tools do we have for each of the strategies? It seems like the sustainable yield approach focuses on restricting pumping and the water level approach better integrates recharge and management pumping.	DW: You have both of those authorities with both. For the pumping metric there is only one number for the whole subbasin, so for example, if you decided that you are not going to pump from your well one year and your neighbor decides to pump double that would be fine and wouldn't exceed the minimum threshold because the total doesn't change. However, under the groundwater elevation approach your neighbor's water level could decrease below the minimum threshold. Thus, there will be an exceedance of the minimum threshold. Water level as a proxy gives a more refined look and you don't lose any tools.	Meeting comment - noted.
									Abby Ostovar: I want to point out that in the Annual Reports we do have to show that we are pumping within sustainable yield. It just wouldn't be what we measure sustainable management criteria with.	
220					Meeting	6/2/2021	**Colby Pereira**	This approach [to use groundwater levels] makes sense, we don't want to base criteria on something that we can't measure.	Comment received.	Meeting comment - noted.

221					Meeting	6/2/2021	**Robin Lee**	Is the storage loss due to subsidence? Could this metric be more appropriate for some place that has subsidence?	DW: I think storage is harder to calculate where there is subsidence because you have to take into account the land has contracted and thus space for storage has been lost. Whereas in the Eastside subbasin where there is no subsidence, the change in storage will only be due to changes in groundwater elevations. We have the ability to get the storage back.	Meeting comment - noted.
222					Meeting	6/2/2021	**Robin Lee**	We had some unintended things, like poor water quality and wells going dry, happen during the 2015 drought and we are still dealing with some undesirable consequences as we speak. I just don't see how we can even start to improve anything from where we are at now. The groundwater elevation minimum threshold that we chose still allows for undesirable results.	DW: The groundwater elevation minimum thresholds are a second discussion, right now we are wondering if you would want to use them for storage.	Meeting comment - noted.
223					Meeting	6/2/2021	**Robin Lee**	I'm in favor of using the groundwater levels as proxies for storage.	Comment received.	Meeting comment - noted.
224					Meeting	6/2/2021	**Chris Bunn**	Derrik, going back to your response to Ross Clark, are you saying if we use the proxy approach we can analyze by user?	DW: Not necessarily. The groundwater level sustainable management criteria are spatially spread out so the minimum thresholds vary across the subbasin, whereas the pumping approach is just one total number for the whole subbasin.	Meeting comment - noted.
225					Meeting	6/2/2021	**Chris Bunn**	The proxy approach could lead to odd results based on the fractured geology of the subbasin.	DW: When we set minimum thresholds we are trying to look at historical water levels to determine if the minimum threshold is reasonable and realistic for each well.	Meeting comment - noted.
226					Meeting	6/2/2021	**Chris Bunn**	I get what you are saying but depending on the strange geology we can see very different water levels from one neighbor to the next.	DW: We are hoping that the groundwater elevation network that we have is complete enough to capture these local differences, the Eastside and Langley subbasins have the most heterogeneity in geology.	Meeting comment - noted.
227					Meeting	6/2/2021	**Chris Bunn**	I think we would want to built out that network as robustly as possible.	Comment received.	Meeting comment - noted.
228					Meeting	6/2/2021	**Horacio Amezquita**	How often are the wells monitored?	DW: They are being monitored by the Water Resources Association (WRA) but Tam could clarify this. Tamara Voss: Yes, so there are three programs for groundwater elevation monitoring wells throughout the Salinas Valley. The monthly (valley-wide), August-trough (subset of 100s of wells), and Fall (mostly coastal, subset of 100s of wells) programs.	Meeting comment - noted.
229					Meeting	6/2/2021	**Horacio Amezquita**	So do you think that the network in the Eastside is representative of the subbasin?	DW: We believe it is a fairly good representation of the subbasin. There might be some local issues that we might not pick up, as Mr. Bunn pointed out.	Meeting comment - noted.
230					Meeting	6/2/2021	**Horacio Amezquita**	The WRA are the ones who are going to give us the warning when water levels drop below the minimum thresholds?	DW: We will do that in the Annual Reports. And it will track how well we are progressing toward the measurable objectives.	Meeting comment - noted.
231					Meeting	6/2/2021	**Horacio Amezquita**	What about in present time? I want to know in present time so we know how drought will affect us each month. We are not getting much help from the lakes, and they are running out of water. How do we get present information?	DW: The GSA is not taking water levels. It is the WRA who takes monthly water levels. We could contact the WRA to set something up. Tamara Voss: If we are monitoring one of your wells and you want to know if the well is in our program then we can give you that data. We also do a quarterly conditions report and we plot water levels for the subarea.	Meeting comment - noted.

232					Meeting	6/2/2021	**Ross Clark**	Are the pros and cons to these to different approaches based on the set of projects we have and the restrictions on pumping?	DW: Not necessarily, because with or without projects we still need to meet the same sustainable management criteria. You could cut pumping to be within the sustainable yield. But if we start recharging water and the sustainable yield goes up, then pumping won't have to be controlled as much. You'd be getting to the same place no matter what approach because the sustainable management criteria don't change. Abby Ostovar: We have a lot of individual wells in the network and we also have the RMS network ...[Abby lost connection] DW: I think what she wanted to say is that we can migrate wells from the whole, larger, network to the RMS network if you feel that the current RMS network is not expansive enough.	Meeting comment - noted.
233					Meeting	6/2/2021	**Chris Bunn**	I'm fine with the proxy approach but I want flexibility to change back to the other approach if need be.	Comment received.	Meeting comment - noted.
234					Meeting	6/2/2021	**Colby Pereira**	Good point, Chris, I was wondering the same thing. Derrik, is that possible?	DW: It is possible, however, it is not the type of item that can be done in an annual report. But if it is done as a public process then it should be possible.	Meeting comment - noted.
235					Meeting	6/2/2021	**Colby Pereira**	I think proxy is the direction that we are leaning toward.	The committee voted unanimously in support of using groundwater levels as a proxy for storage.	Will be incorporated in the SMC chapter.
236					Meeting	6/2/2021	**James Sang**	It seems like each well has a different minimum threshold, so if a person starts running out of water because they are pumping more than usual, it makes sense and is more accurate to look at each individual well.	Comment received.	Meeting comment - noted.
237					Meeting	6/2/2021	**Robin Lee**	I always thought of the scalping plant as using injection wells, not delivering water.	Abby Ostovar: We have scoped it and it will be very expensive. Additional costs will include treating water to drinking water standards and paying for injection wells and distribution systems.	Meeting comment - noted.
238					Meeting	6/2/2021	**Robin Lee**	It might be worth looking at both a CSIP-style and injection well-style scalping plant. Another thing I wanted to mention is that there has been a lot of talk about regenerative soils. The reason I bring it up is because it can conserve water.	Abby Ostovar: That could be added under the Ag BMPs	Meeting comment - noted.
239					Meeting	6/2/2021	**Robin Lee**	It can also create a carbon market.	Abby Ostovar: We like projects that have co-benefits but we definitely want to focus on projects that are primarily beneficial to groundwater.	Meeting comment - noted.
240					Meeting	6/2/2021	**Robin Lee**	Also about the fallowing, are you following bills that are coming out? The Rivas bill is one of them. Are you taking those into account when you are looking into projects?	Donna Meyers: We are following all the bills and getting updates from our policy people in Sacramento and we are also tracking budgets.	Meeting comment - noted.
241					Meeting	6/2/2021	**Robin Lee**	I see the scalping plant as something that can help mitigate cone of depression.	Comment received.	Meeting comment - noted.
242					Meeting	6/2/2021	**Chris Bunn**	The estimates for fallowing land and the lower end of rents and alnd acquisition costs seem pretty low. And the extraction barrier says that you need coastal permits, couldn't that be avoided by moving the project inland? On the river maintenance programs, it looks like the savings is just related to Arundo removal and not vegetation management in general.	Abby Ostovar: For the extraction barrier and desal plant, we haven't selected a site, so we tried to be as comprehensive as possible for potential permitting. For stream maintenance, we did it based on Arundo removed but not on vegetation removed. Component two is just invasive species removal, not vegetation removal.	Meeting comment - noted.
243					Meeting	6/2/2021	**Chris Bunn**	I think there were some older studies where they did some estimates and the ET numbers were pretty staggering.	Abby Ostovar: I want to say that the ET is about 4-acre/year/acre for native vegetation.	Meeting comment - noted.
244					Meeting	6/2/2021	**Ross Clark**	I've submitted a report that cover crops could play similar role as MAR without taking land out of production. That concept should be integrated. It could reduce cost significantly in areas with high recharge in the winter. About the double-counting, land that will be taken out of production for these floodplain projects might also be fallowing land and thus reducing pumping. Is there a way to integrate all of these benefits?	Emily Gardner: The MAR projects are intended to be measurable and that's why the projects are sized the way they are. The cover crop concept could be explored under Ag BMPs with appropriate conversations with the ag community.	Meeting comment - noted.

245					Meeting	6/2/2021	**Horacio Amezquita**	On the cover crops, I don't know how many acres are being used, but it's the way to collect water and recharge it and regenerate soil. Is the USDA going to incentivize cover crops, we should keep out eyes out for that. Also, I don't know how many acres are not using drip systems. Water is being wasted when using sprinklers. It would be a good idea to see how many acres aren't using drip.	Comment received.	Meeting comment - noted.
246					Meeting	6/2/2021	**Colby Pereira**	There has been a large shift toward drip irrigation systems over the past several years. However, some farmers can't use drip because of minerals in their water or to germinate fields.	Comment received.	Meeting comment - noted.
247					Meeting	6/2/2021	**Steve McIntyre**	Regarding regenerative soils and carbon markets, it's a very exciting place and there indeed is water conservation from regenerative soils. In our vineyards we have been using biochar and compost to conserve water and sequester carbon and there is a carbon credit attached to this. The Netflix documentary, Kiss the Ground, provides a lot of good information on carbon sequestration.	Comment received.	Meeting comment - noted.
248					Meeting	6/2/2021	**James Sang**	When I look at the total cost projects, I was wondering who can afford to pay for these. I wouldn't want to have farmers go out of business. And if every one of these projects were implemented will water levels in wells go up to the max or will some stay low? And if they stay low what will be done about that?	Abby Ostovar: I know that we have sufficient projects to mitigate overdraft, we have a good bucket from where we can choose projects that can be implemented. We don't know which ones will move forward but it will be an ongoing discussion during implementation.	Meeting comment - noted.
249					Meeting	6/2/2021	**James Sang**	I remember seeing a diagram of how you were going to do the implementation committee. I think that it had too many layers, I think it should be set up so that the subbasin committee members can voice their opinion at all stages.	Comment received.	Meeting comment - noted.
250					Meeting	6/2/2021	**Robin Lee**	I was just wondering how the interconnected surface water location was identified?	Abby Ostovar: Using the Model. Some analysis was done looking at the timing and to get rid of the effects of agricultural drains.	Meeting comment - noted.
251					Meeting	6/2/2021	**Robin Lee**	Could the model recognize any historical locations of interconnection?	Abby Ostovar: It shows the percent of time that it is connected. Areas connected over 50 percent of the time is mapped. This was a first cut at it.	Meeting comment - noted.
252					Email	7/12/2021	**Kevin Piearcy**	Thank you for accepting my comments for the Administrative Record. I once again object and will continue to object to the references that the areas in the basin are sub-basins. I have attached a 1949 report where these areas were developed and it clearly states on pg. 14, that "The valley floor was divided into five areas for analytical purposes." It goes on to state, "These areas are not to in any way to be confused with sub-basins." We all need to understand that the boundry lines dividing all these sub-areas were not created because of any hydrological differences. No hydrological information to date has ever been presented to show any of the sub-areas to be sub-basins.	Comment received.	Bulletin 118 supersedes the 1949 Bulletin 52-B. DWR, which has jurisdiction, has declared the areas to be subbasins, and by definition in SGMA, basins. As the GSPs are developed to meet the requirements of SGMA, they follow the DWR-defined subbasin boundaries and nomenclature. Although, the differences among subbasins warrant individual Groundwater Sustainability Plans, SVBGSA plans to manage the entire Salinas Valley Groundwater Basin in an integrated fashion that allows each subbasin to attain or maintain sustainability.
								I once again object to the claim that a diversion point exists in Chualar for the 11043 permit. All documents show Soledad as the diversion point for this permit. Per a 2013 settlement this permit has until 2026 to be used. I am sure an extension can be obtained, but MCWRA would need to get started on it as they hold the permit and all rights. I believe this permit and project is key to improving water issues along the eastside. I have attached support information for my position.		The WRA has filed for an extension of 11043. If WRA fails to meet any applicable conditions, DWR could set another revocation; however, the 11043 permit does not automatically expire in 2026. The permit always had 2 diversion points, Chualar and Soledad.

253					Meeting	7/12/2021	**Colby Pereira**	[RE: Interconnected Surface Water SMC Update]: I like the clarifying language that was added, it made the document stronger.	Comment received.	Meeting comment - noted.
254					Meeting	7/12/2021	**Horacio Amezquita**	It is likely that there is still water sitting there where this well is located. In the other creeks the water runs out. So in the Eastside even though there is a lot of water there is nowhere to recharge, the water just runs off into other subbasins. If we capture this water and clean it and inject it would it be against the law to take this water away from the other subbasins?	Abby Ostovar: We have projects that try to capture water through various means in the Eastside so that it can be recharged. Injecting is usually more expensive because the water has to be treated, but it is a preferable method if there are clay layers or aquitards that don't allow water to travel downward.	Meeting comment - noted.
255					Meeting	7/12/2021	**Horacio Amezquita**	Did you ever look into holding water in high elevations and then releasing it little by little? It could be good to look at, since it is too expensive to inject water.	Abby Ostovar: No, we have not looked into that we focused on projects within the subbasin. Reservoirs can be expensive, too.	Meeting comment - noted.

256					Meeting	7/12/2021	**Horacio Amezquita**	Everyone is doing ponds to store water, it's not that expensive. If they're doing it in the valley, why not in the mountains? They can be simple structures that hold lots of water like they were doing in Cesar Chavez.	Abby Ostovar: Okay, I thought you were referring to dams and reservoirs. Emily Gardner: We can look into recharging water higher in the watershed or locating the overland flow projects higher in the watershed. Abby Ostovar: We were thinking of doing something like this is Gabilan Creek and we would be able to capture a lot more water than overland flow projects. But we will still need diversion structure and we can only take water when flow in the creek is above the 90th percentile. So there would have to be a lot of flow for us to actually be able to capture it.	Meeting comment - noted.
257					Meeting	7/12/2021	**Horacio Amezquita**	There's a creek around here and when it rains all the water that goes into the creek just flows to the river and then the ocean. We could capture this water but the permits are too strict. I know it's hard to do because of the regulations but when we are in a place like this with a drought there should be exceptions where we can hold water and release it slowly. We can capture a lot of water when it rains to not spend so much money on projects.	Comment received.	Meeting comment - noted.
258					Meeting	7/12/2021	**James Sang**	I think that subsoiling near the base of Gabilan could capture a lot of water. If you subsoil plow down to 24-36", you could have quite a bit of water because the area is pretty permeable.	Comment received.	Meeting comment - noted.
259					Meeting	7/12/2021	**James Sang**	I have a comment on the sustainability of the Eastside. I think it's pretty easy to make it sustainable. You have about 34,000 irrigated acres and the deficit is 20,000 AF of water. During the winter when it is raining, most of the farmers are not using the land. If we could subsoil plow that land, on average you should be able to collect at least 12" of rain water per acre. If 2/3 of people did this, we could make it sustainable. The problem with the current process is that the projects in the plan don't deliver the water to the wells that need it.	Comment received.	Meeting comment - noted.
260					Meeting	7/12/2021	**Robin Lee**	[Re: Committee consensus for interconnected surface water SMC update] I'm happy with the update as long on you incorporate the study by CCWG and not just rely on modeling.	Comment received.	Meeting comment - noted.
261					Meeting	7/12/2021	**Horacio Amezquita, Caroline Chapin, Colby Pereira**	[Re: Committee consensus for interconnected surface water SMC update] I'm fine with it.	Committee consensus for interconnected surface water SMC update	**This will be incorporated into GSP development.**
262					Meeting	7/12/2021	**Colby Pereira**	[RE: GSP Version 2, Ch. 1-3]: I think you guys added a lot of good clarifying information to this new version.	Comment received.	Meeting comment - noted.
263					Meeting	7/12/2021	**Robin Lee**	There was a lawsuit that was mentioned in Chapter 3 and affects from our subbasin down to Forebay. It was asking for proof of enough water for 2030, do you know the status of it?	Marina Pantchenko: I will follow up with Les.	Meeting comment - noted.
264					Meeting	7/12/2021	**Robin Lee**	[RE: GSP Version 2, Ch. 4]: How much work is being done to see how the Eastside is connected to the Deep Aquifers?	Abby Ostovar: The Deep Aquifers study will look into the extent and interconnectivity of the Deep Aquifers, but we will not do any additional work on this. We summarized the existing work on the Deep Aquifers for the GSPs.	Meeting comment - noted.
265					Meeting	7/12/2021	**Norm Groot**	Looking at these two [surface geology] diagrams it is indicative that the red lines are the cross sections. It might be worthwhile to look at cross sections near Quail or Chualar Creek to show why there is so much variability in groundwater levels in the subbasin.	Comment received.	Meeting comment - noted.
266					Meeting	7/12/2021	**Robin Lee**	[RE: GSP Version 2, Ch. 5]: When water levels are at the minimum threshold there will be a gradient. But really it's the pumping that is causing the gradient, right?	Abby Ostovar: There would be a gradient if there is any different in groundwater levels.	Meeting comment - noted.

267					Meeting	7/12/2021	**Robin Lee**	But since we are not getting a lot of rain then we can assume that pumping is causing the gradient. And because of the variable geology of the subbasin, it's hard to tell where those gradients will be.	Abby Ostovar: Correct, gradients could be variable because of geology.	Meeting comment - noted.
268					Meeting	7/12/2021	**Horacio Amezquita**	So the water systems will be safe if we stick to the minimum thresholds?	Abby Ostovar: It is difficult to say but water systems won't experience anything past historical levels.	Meeting comment - noted.
269					Meeting	7/12/2021	**Horacio Amezquita**	So who is monitoring that we don't pass the minimum thresholds? No one is monitoring this monthly or quarterly?	Abby Ostovar: We do, annually in annual reports. Colby Pereira: This GSA has jurisdiction over what SGMA regulates.	Meeting comment - noted.
270					Meeting	7/12/2021	**Horacio Amezquita**	I just think that we should be more concerned with more frequent monitoring to know how things are changing and how water levels are going down monthly that way we see how our subbasin is affected. And if it's possible to have access to this information that would be nice.	Comment received.	Meeting comment - noted.
271					Meeting	7/12/2021	**Robin Lee**	Other agencies are monitoring more frequently than the GSA, how does that information go into the GSP and affect implementation?	Colby Pereira: Again, I think we are crossing into the fact that there are other regulatory agencies that regulate this. And the SGMA mandate is very narrow when it comes to water quality and we don't want to step on any toes. Emily Gardner: The County notifies users when there is an exceedance at their location.	Meeting comment - noted.
272					Meeting	7/12/2021	**Robin Lee**	So do these other agencies have the authority to limit pumping? Who makes the connection between pumping in one area and the exceedance in one well?	Emily Gardner: You are tackling the big question, and it's what DWR flagged for us from the 180/400 GSP so now we are thinking through pumping in relation to water quality. The current thinking is this, say there is an increase in exceedances of water quality and then there an exceedance in the groundwater level minimum threshold. The two exceedances could be related and now we have to think and determine if and how these are connected, there is definitely not a direct line between the two. Now let's say that there is a water quality exceedance but water levels are going up, then pumping is probably not the culprit and we would have to determine what the cause is.	Meeting comment - noted.
273					Meeting	7/12/2021	**James Sang**	The county would probably be interested in this issue, right? What other agencies could people go to for water quality information?	Colby Pereira: They can go to the County, Regional Water Quality Control Board, and the State Water Resources Control Board.	Meeting comment - noted.
274					Meeting	7/12/2021	**Horacio Amezquita**	There are a lot of discrepancies with these numbers. I know there are some plans to put in meters in the Eastside subbasins. Do we know how many wells are metered?	Abby Ostovar: I don't know off the top of my head, but GEMS gives pretty good coverage of the Eastside for wells with a 3-inch internal diameter discharge pipe.	Meeting comment - noted.
275					Meeting	7/12/2021	**Horacio Amezquita**	Can we have the exact numbers for each well and well type?	Abby Ostovar: We have annual pumping numbers from GEMS but it's confidential on a well-by-well basis.	Meeting comment - noted.
276					Meeting	7/12/2021	**Horacio Amezquita**	So do we know how many wells in total are metered?	Abby Ostovar: We know how many wells are in total from DWR's well completion reports and the biggest pumpers report to GEMS. One of the implementation actions is to start a well registration program to have a good number of active wells in the Subbasin.	Meeting comment - noted.
277					Meeting	7/12/2021	**Horacio Amezquita**	My question is do we know how many wells pump what? Or what all wells pump?	Emily Gardner: No, we are not authorized to require *de minimis* users to report pumping.	Meeting comment - noted.
278					Meeting	7/12/2021	**Robin Lee**	If you plug in today's data into the future sustainable yield model would we have the same results? Will you run the model with new data to make sure the sustainable yield holds true?	Emily Gardner: We will be running the model every 5 years. Abby Ostovar: Yes, every 5 years with the GSP updates. Additionally, the model would need to be recalibrated every time we add new data and it's a pretty extensive process that would take a lot of GSA resources to run frequently.	Meeting comment - noted.

279					Meeting	7/12/2021	**Robin Lee**	[RE: GSP Version 2, Ch. 7]: So what triggers something to happen within the plan if there's an exceedance of any of the SMC?	Abby Ostovar: The update will occur every 5 years, and annually we will look at all data. There isn't a hard trigger that causes us to take action. We will track the exceedances every year. Colby Pereira: Please feel free to reach out to the staff as you review this material and have questions.	Meeting comment - noted.
280					Meeting	7/12/2021	**Horacio Amezquita**	Who keeps track of the wells that are being destroyed because of water quality?	Emily Gardner: Nobody	Meeting comment - noted.
281					Meeting	7/13/2021	**Colby Pereira**	[RE: GSP Version 2, Ch. 8]: I think this is a very good slide and a lot of the questions we have had on water quality have been captured here. I think our broad policy for writing our GSP has been based on waiting on DWR comments on the 180/400 GSP. I think we are taking the right direction and I'm supportive of taking their guidance.	Comment received.	Meeting comment - noted.
282					Meeting	7/12/2021	**Horacio Amezquita**	I think the state or the regional board should give us the present status of water quality, we don't want to base this on 3- or 4-year-old data.	Comment received.	Meeting comment - noted.
283					Meeting	7/12/2021	**Horacio Amezquita**	[Re: Interlake Tunnel Project] I think it's the best project to get water.	Abby Ostovar: This would not just be for the Eastside but for multiple subbasins.	Meeting comment - noted.
284					Meeting	7/12/2021	**Robin Lee**	Another BMP project would be regenerative soils, it stores water and we could establish a carbon market. Would something like this be part of the projects? This could make BMP projects stronger?	Colby Pereira: If this is something you would like to see you can submit to the GSA so they can keep track of your idea in the comment table.	Meeting comment - noted.
285					Meeting	7/12/2021	**James Sang**	When we get water into the ground is there any way we can get water into specific wells? And is the diversion process is dependent on a high flow of water so is that feasible?	Comment received.	Meeting comment - noted.
286					Meeting	7/12/2021	**Robin Lee**	I would like more information on carbon and water markets. I think it's time to address this again.	Comment received.	Meeting comment - noted.
287					Meeting (email for meeting)	7/12/2021	**Chris Bunn**	Per staff comments from last week's SVBGSA board meeting, that the agency will run sub-basin to sub-basin modeling for connectivity and interactions, the Eastside draft needs to include language saying all relevant text (water budgets, projects, management actions, etc) will be adjusted according to the modeling results. Sub-comment on this: I can't definitively agree to any project or management action without first seeing the results of the sub-basin to sub-basin modeling.	Emily Gardner: We will implement projects and management actions, project benefits will be modeled as a whole basin, so that's when we'll start to capture the benefits between different subbasins.	All model simulations are run for the entire model area, which includes most of the Salinas Valley Groundwater Basin. The water budgets include the subsurface flow between subbasins.
288					Meeting (email for meeting)	7/12/2021	**Chris Bunn**	F2 in Projects/Mgmt Actions Summary - ASR wells and winter releases is not something the 180/400 farming community has agreed to in any sort of fashion, let alone have had the opportunity to formally discuss. This also impacts the Eastside, particularly given CSIP expansion plans.	Comment received.	ASR wells was part of the approved 180/400-Foot Aquifer Subbasin GSP. As with all the GSPs, projects and management actions included do not indicate approval of them but rather that they are potential options to reach sustainability over the next 50 years, as needed.
289					Meeting (email for meeting)	7/12/2021	**Chris Bunn**	Fallowing/Retiring Land - the cost per AF gained needs to be re-examined. If the SVBGSA contracted with a landowner to fallow/retire land, then it could be a fairly straightforward $2,000 rent/acre that would have to be covered, plus or minus, depending on ranch quality (I doubt you're going to be able to make this kind of connection, due to the long-term relationships between landowners and farmers). That acre/s would have been using 2-3 acre/feet per acre/year, depending on crop (berries might be more). If the contract is with a farmer (who might also be the landowner), then the cost is going to be different: rent + crop income loss + wage loss, etc. So far, your cost per AF in this section doesn't make sense.	Comment received.	Math error fixed. Text has been clarified to note that this estimate does not capture potential foregone crop income or wages, which may affect willingness to participate.

290					Email	7/16/2021	**Anonymous Eastside Stakeholder**	1. Carbon Credits: One of the members kept bringing up carbon credits. I have been researching this opportunity for XXXXX for the last year and, in my opinion, this is not something that is going to be attractive to Salinas farmers, and is still in its infancy with scammers and fraud.	Comment received.	Thank you for your input and for looking into the impact carbon sequestration could have in the Salinas Valley.
								The two big issues that lower the attractiveness of the program are:		
								i. It must be a new procedure/operation that sequesters carbon. Not a practice such as no-till/low-till or cover crops that the farmer is already doing, and;		Improving recharge is part of several projects and management actions within this GSP. Given the geology and topography of the Eastside Subbasin, potential areas of recharge need to be extensively researched to ensure deep percolation is possible. Small-scale recharge could be helpful in the Subbasin because of this. This GSP presents sufficient projects and management actions to reach sustainability; however, prioritization of those will occur early within GSP implementation.
								ii. It must be permanent. Hard to do.		
								This is a link to an article that helps explain the current situation and the potential for future application.		
								https://agfundernews.com/carbon-credits-in-ag-dishing-the-dirt.html?ct=t(EMAIL_CAMPAIGN_7_15)&goal=0_8e101ace96-7f71d6a52f-99673261		
								2. Recharge: Obviously, anything we can do to develop or improve recharge should be a priority, but I did not see this addressed as an important aspect of the GSP. One of the comments centered around deep ripping in order to open the ground and take advantage of rainfall. This is in conflict with the progress we have made with low-till practices and improving the soil microbiome – although it may dry out the fields faster. Dirt berms were all over the Gabilan creeks and washes to collect and provide water for the cattle, and I have been told by hydrologists that these little reservoirs were actually beneficial rechargers because they were away and above the clay hard pan. Mosquito Abatement would probably object, but something to consider.		
291					Meeting	10/6/2021	**Chris Bunn**	Initial thought, I don't mind the changes but I would request to add some clarifying language in row F3 of the table that underscores the fact that this type of action should be done with a valley-wide perspective not subbasin only because it is something that will affect the whole valley. I would be more comfortable if that was added.	Abby Ostovar: I think the text has that in there but I'll go back and check.	Already in text
292					Meeting	10/6/2021	**Horacio Amezquita**	Can you explain how this reservoir operation is going to help the Eastside and the rest of the Salinas Valley?	Abby Ostovar: It's a pretty wide open management action, it doesn't dictate how the reservoirs will be reoperated but it will look into feasibility analyses that will determine how the subbasins are affected. Just because the Eastside isn't along the Salinas River it doesn't mean it won't be impacted.	Meeting comment - noted.
293					Meeting	10/6/2021	**Horacio Amezquita**	Will this help the other subbasins?	Abby Ostovar: I think that's the idea, this will be an analysis to see how this will help with groundwater sustainability across the whole Salinas Valley.	Meeting comment - noted.

294					Meeting	10/6/2021	**Horacio Amezquita**	Will this study be done quickly?	Abby Ostovar: That depends on implementation and how the implementation committee prioritizes it.	Meeting comment - noted.
295					Meeting	10/6/2021	**Chris Bunn**	Would we have to recalculate the water budgets for all the subbasins?	Abby Ostovar: Not necessarily, but part of the feasibility study would be how this action would affect the water budget.	Meeting comment - noted.
296					Meeting	10/6/2021	**Chris Bunn**	I just get concerned that some parts of the Valley will make decisions that all subbasins need to weigh in on.	Comment received	Meeting comment - noted.
297					Meeting	10/6/2021	**Horacio Amezquita**	Can we borrow water from Upper Valley and Forebay since they get a lot of recharge from the lakes?	Abby Ostovar: As we've been thinking of water allocations we've been thinking about subbasin context, but the Upper Valley and Forebay are not thinking about relying on water allocations. The groundwater flow between subbasins is the baseline that you're starting from based on SGMA so this could be something that subbasin committees can talk to each other about.	Meeting comment - noted.
298					Meeting	10/6/2021	**Horacio Amezquita**	I just think about this as the Salinas Valley as a whole, good neighbors would want to give water for seawater intrusion and to the Eastside.	Comment received	Meeting comment - noted.
299					Meeting	10/6/2021	**Chris Bunn**	Just to follow up on Horacio's question, has the GSA analyzed who owns how much of the reservoir water in context of the Zone 2C assessments? That would partially answer his question.	Emily Gardner: That is squarely in Water Resource Agency's jurisdiction.	Meeting comment - noted.
300					Meeting	10/6/2021	**Chris Bunn**	I think that dictates a lot of the water budget and the Water Resource Agency's view of who owns the water in the reservoirs.	Abby Ostovar: We try really hard to not duplicate their efforts or do things that are their responsibility.	Meeting comment - noted.
301					Meeting	10/6/2021	**Chris Bunn**	Of course. I think it's just inquiring about what percentage belongs to each subbasin. This will help the water budget and financial assessment.	Abby Ostovar: The water budgets are about groundwater inflows and outflows and don't have to do with financial assessments. Emily Gardner: Water budgets represent the hydrologic reality but not how much was paid for water or by who.	Meeting comment - noted.
302					Meeting	10/6/2021	**Robin Lee**	This is getting into the realm of water trading, if you want to share your water with someone else then that is a trade. If we got into the water trading everyone would have to know how much water they have and how much they are willing to give.	Comment received	Meeting comment - noted.
303					Meeting	10/6/2021	**Horacio Amezquita**	I think it would be a good idea to have the information that Chris is asking for, because any subbasin that is close to the river is getting all the benefits. The Water Resource Agency should give us a number of how much water each subbasin can get from the lakes.	Abby Ostovar: That is something that can be done with this management action.	Meeting comment - noted.
304					Meeting	10/6/2021	**Tom Virsik**	The discussion that payments reflect a quantity of water that belongs to, is owned by, or reserved for a specific subbasin is, in the end, a move towards a comprehensive adjudication -- for better or worse. It's also an inaccurate approach because the amounts paid to the MCWRA include benefits and purposes beyond "water" such as flood control, and would correlate only to water surplus to prior rights. While possibly fascinating, the discussion does not assist moving the GSA towards a SGMA compliant GSP for the Eastside. With respect to Mr. Amezquita's suggestion of "borrowing" water, it has been done in other places under somewhat different circumstances via temporary fallowing. It is a form of water trading as Ms. Lee noted.	Steve McIntyre: To Horacio's comment, all of the benefit is not happening in the Forebay and Upper Valley. We have to account for flood control and there was a cost benefit analysis that was done for the Rubber Dam and other river projects that may not be accurate anymore but that's what was approved by the voters. In the future we might have new cost benefit analyses to rely on but we need to be accurate about the fact that the Salinas River benefits the whole Basin.	Meeting comment - noted.
305					Meeting	10/6/2021	**Chris Bunn**	What's the difference between drought reoperation and reservoir reoperation?	Abby Ostovar: Drought reoperation looks at the reservoir reoperation during drought and it's done through the Water Resource Agency's Drought Technical Advisory Committee (D-TAC). The other reservoir reoperation could be done at any time.	Meeting comment - noted.

306					Meeting	10/6/2021	**Chris Bunn**	I make a motion to include the new language [about reservoir reoperation] to projects and management actions with parenthetical about collaboration with MCWRA to evaluate potential re-operations scenarios including the Interlake Tunnel	Motioned passed	The language was already in the text including "This managment action consists of SVBGSA collaborating with MCWRA and other interested parties..." and "Both project referenced below rely on intrastructure owned and operated by MCWRA and implementing either would require a cooperative effort between SVBGSA and MCWRA. These projects include: 1) ILT and Spillway Modification...."
307					Meeting	10/6/2021	**Horacio Amezquita**	So will we take our Interlake Tunnel all together?	Abby Ostovar: The Interlake Tunnel will be wrapped into this management action and will be a potential project so the whole description will be shortened into one paragraph. The reason for this is because these projects are not completely fleshed out so and the Forebay Subbasin committee thought it would be better to not include it or its potential costs.	Meeting comment - noted.
308					Meeting	10/6/2021	**Chris Bunn**	[Re: Water Quality SMC] I have a question about the GSA's required pumping reductions getting a free pass. What if this changes groundwater gradients?	Abby Ostovar: That is something that may be the responsibility of the GSA. We were thinking that the pumping restriction would be across the board not point specific so there will be a percent reduction across the whole subbasin or valley than at a specific well or area.	Meeting comment - noted.
309					Meeting	10/6/2021	**Chris Bunn**	What about at subbasin boundaries? I just feel like there should be a caveat to address existing differences in gradients and how pumping restrictions could potentially amplify these gradients.	Abby Ostovar: Okay.	Meeting comment - noted.
310					Meeting	10/6/2021	**Horacio Amezquita**	How are we doing now? Are we above the minimum thresholds?	Abby Ostovar: We won't know until November/December because that is when MCWRA conducts their annual water levels measurements.	Meeting comment - noted.
311					Meeting	10/6/2021	**Horacio Amezquita**	MCWRA doesn't monitor on a monthly level?	Abby Ostovar: Some wells are but most are annual only.	Meeting comment - noted.
312					Meeting	10/6/2021	**Horacio Amezquita**	What about water quality? Will we get a notice that will tell us to see what water system is out of compliance?	Abby Ostovar: Like an individual water system? Emily Gardner: My understanding is that the Monterey County has their own compliance sampling, and they notify the water system if they have an exceedance.	Meeting comment - noted.
313					Meeting	10/6/2021	**Horacio Amezquita**	I understand but they don't sample frequently enough, and what if they sample when water levels are high and the water quality isn't as bad as it would be if the water levels were low. So water systems have to look out for themselves.	Abby Ostovar: We will analyze water quality on an annual basis so we will have a good idea of how exceedances of different constituents change.	Meeting comment - noted.
314					Meeting	10/6/2021	**Horacio Amezquita**	When does that sampling occur?	Abby Ostovar: Good question, but it is dependent on existing monitoring programs.	Meeting comment - noted.
315					Meeting	10/6/2021	**Robin Lee**	It seems like the changes to the text address the lack of action vs. taking action, so if the water levels are above the minimum thresholds then we don't take action if water quality degrades.	Abby Ostovar: SGMA says that the GSA can take a "we cannot cause any harm" approach.	Meeting comment - noted.
316					Meeting	10/6/2021	**Robin Lee**	I understand that, so if the water levels are above the minimum thresholds then we don't have to take action if the water quality degrades. I'm confused by when we would take action.	Abby Ostovar: We set water level minimum thresholds above historic lows so we should be preventing any further degradation.	Meeting comment - noted.
317					Meeting	10/6/2021	**Robin Lee**	Because it's still above the minimum threshold then it's not the GSA's responsibility?	Abby Ostovar: Maybe think of it separately, we have water level minimum thresholds that we have to avoid but then water quality can degrade for other reasons unrelated to the water level minimum thresholds.	Meeting comment - noted.
318					Meeting	10/6/2021	**Robin Lee**	If the water quality degrades then we would have to find out why, and it would require some study, I think.	Abby Ostovar: Correct, it's a tricky topic but we will make sure that the project and management actions have enough water quality monitoring to try to figure out if GSA action caused water quality degradation.	Meeting comment - noted.

319					Meeting	10/6/2021	**Horacio Amezquita**	What if we pass the minimum threshold and the water quality gets degraded because we don't do anything?	Emily Gardner: Try to think of them as separate items, the first thing to do would be to implement projects to raise water levels. I don't know who the legal responsibility for water quality degradation would belong to.	Meeting comment - noted.
320					Meeting	10/6/2021	**Horacio Amezquita**	But what if we take out more and more water and water quality goes down?	Abby Ostovar: Regardless we have to act to decreasing groundwater levels, they have to be addressed.	Meeting comment - noted.
321					Meeting	10/6/2021	**Chris Bunn**	You're not tying water levels as proxies for water quality, right?	Abby Ostovar: No, but we do want to acknowledge that keeping water levels above historic lows should not be mobilizing any more constituents. It's an additional reason to not set water level minimum thresholds lower.	Meeting comment - noted.
322					Meeting	10/6/2021	**Chris Bunn**	Can we review MCWRA 1995 white paper? I think it will help to answer some of Horacio's questions.	Comment received	Meeting comment - noted.
323					Meeting	11/19/2021	**Robin Lee**	I have a disagreement on the Chapter 9 slide, we have the scalping plant idea and that takes care of the wastewater projects.	Abby Ostovar: Right, we decided to keep that open so that we don't have to commit to the one project in Salinas. But we do fully have the scalping plant in there as a project.	Meeting comment - noted.
324					Meeting	11/19/2021	**Horatio Amezquita**	What were the last water levels included in the GSP?	Abby Ostovar: 2019 is our "current" data.	Meeting comment - noted.
325					Meeting	11/19/2021	**Horatio Amezquita**	Are you checking the current data for 2021? Do you have information on how water levels are doing during this drought?	Abby Ostovar: We will include both the 2020 and 2021 data in the annual report.	Meeting comment - noted.
326					Meeting	11/19/2021	**Horatio Amezquita**	Is it possible the Advisory Committee could get this data to review?	Abby Ostovar: Yes, so the Advisory Committee will get the annual report. Emily Gardner: All the subbasin committees will receive the annual reports to review as well.	Meeting comment - noted.
327					Meeting	11/19/2021	**Robin Lee**	The study that is going on for surface water habitat, when is it going to be done? And when will it be included in the GSP?	Emily Gardner: Could you clarify what work you're talking about?	Meeting comment - noted.
328					Meeting	11/19/2021	**Robin Lee**	The study that was being done by Central Coast Wetlands Group.	Ross Clark: We do have funding to investigate potential infiltration sites. We look forward to doing this with our watershed coordinator and Emily and Donna next year.	Meeting comment - noted.
329					Meeting	11/19/2021	**Robin Lee**	I thought it was already ongoing.	Ross Clark: We have been doing field walks but we were restricted because of COVID and because the GSP has not been adopted. Emily Gardner: During implementation we will try to get in line with groups that are taking on projects like this to see how we can collaborate with these groups to get these projects done. The implementation committee will look at how and if we can help fund such projects.	Meeting comment - noted.
330					Meeting	11/19/2021	**Robin Lee**	I think it's important to pinpoint these sites so we are able to recharge when we do get rain to capture in the fields.	Comment received	Meeting comment - noted.
331					Meeting	11/19/2021	**Horatio Amezquita**	Regarding what Robin is saying, most of the fields in the Salinas do not capture this water. Most of this water is not being used to recharge the aquifers. We also need to figure out how to capture this water when it comes down quickly, because we are losing water and it's a problem.	Comment received	Meeting comment - noted.
332					Meeting	11/19/2021	**Ross Clark**	Regarding this committee and GSP development, I have been very pleased with this process and the constructive dialogue that we have been able to have.	Comment received	Meeting comment - noted.
333					Meeting	11/19/2021	**Chris Bunn**	Going back to on-field capture, it is a very complex issue. It is not as simple as you think, you can potentially sour land among other unintended consequences.	Comment received	Meeting comment - noted.
334					Meeting	11/19/2021	**Ross Clark**	I totally agree that it's complex, is there a way that we can have an offline dialogue where we have identified the best recharge areas? Can you facilitate this?	Chris Bunn: Sure, but you should probably also talk to the farm bureau of Monterey County.	Meeting comment - noted.
335					Meeting	11/19/2021	**Ross Clark**	I move to approve of the draft GSP	Comment received	The GSP was approved unanimously with any necessary factual corrections.

336					Meeting	11/19/2021	**Chris Bunn**	Does this last motion include comments and responses?	Emily Gardner: No, that was only about the DWR Draft GSP.	Meeting comment - noted.
337					Meeting	11/19/2021	**Chris Bunn**	Regarding the Salinas Basin Water Alliance comment, the response was a little sketchy and the Aquilogic letter should also be addressed.	Emily Gardner: Our response is to try to engage with the people who are having these comments. Writing brief responses may not the best way to have a discussion. A lot of these comments can be looked at further during implementation. Donna Meyers: The work ahead of us is to operationalize these plans. Getting the plans in to the State is an important step to be compliant with the law, and that is our priority right now. I see a lot of upcoming engagement when we get into implementation.	Meeting comment - noted.
338					Meeting	11/19/2021	**Chris Bunn**	I understand but I think the Alliance will be following up.	Comment received	Meeting comment - noted.
339					Meeting	11/19/2021	**Horatio Amezquita**	When do you think the next committee is going to start working on projects to help the Subbasin?	Emily Gardner: Hopefully, the implementation committee will convene in March. One of the highest priorities will revolve around what information the committee members need to start prioritizing projects.	Meeting comment - noted.
340					Meeting	11/19/2021	**Horatio Amezquita**	And the integrated implementation committee?	Emily Gardner: Hopefully that one will convene in April.	Meeting comment - noted.
341					Meeting	11/19/2021	**Horatio Amezquita**	Are all the subbasins going to cooperate to work as one?	Emily Gardner: It's in everybody's best interest. And I think so far everyone has shown up and taken part in constructive dialogue.	Meeting comment - noted.
342					Meeting	11/19/2021	**Chris Bunn**	It seems like there is a certain amount of assumption that has to happen by taking on implementation before DWR approving our plans.	Donna Meyers: I think there's not a lot of risk in doing implementation and planning work. We need to be ready and do our stakeholder process to be ready for the money available for projects. I think we are sitting in a really good strategic place and that we have a good relationship with DWR.	Meeting comment - noted.
343					Meeting	11/19/2021	**Horatio Amezquita**	This money that is coming from the State, is this money going to be able to use for projects that will be very costly for the residents of the Salinas Valley?	Donna Meyers: Yes, our projects will be eligible for SGMA money. It'll be difficult to get these projects on their feet. The implementation committees need to start getting ready to line up. Abby Ostovar: Donna was 100% true but there are now more plans that been approved and we are looking at those and making sure our plans are in line with what DWR is looking for.	Meeting comment - noted.

Eastside Aquifer Subbasin Groundwater Sustainability Plan Development Comment Letters Received

1. Ross Clark, Central Coast Wetlands Group. 060520
2. Heather Lukacs, Community Water Center. 071020
3. Diane Kukol, Central Coast Regional Quality Control Board. 101620
4. Chris Bunn. 103020
5. Ross Clark, Central Coast Wetlands Group. 110620
6. Chris Bunn. 111120
7. George Fontes, Salinas Basin Water Alliance. 031021
8. Brent Buche, Monterey County Water Resources Agency. 031221
9. James Sang. 041921
10. George Fontes, Salinas Basin Water Alliance. 042121
11. Heather Lukacs, Community Water Center & Horacio Amezquita, San Jerardo Cooperative, Inc. 042321
12. Community Water Center. 042821
13. Heather Billing, Provost and Pritchard. 051221
14. Norm Groot, Salinas Basin Agricultural Water Association. 051221
15. Fred Nolan. 051321
16. Heather Lukacs, Community Water Center & Horacio Amezquita, San Jerardo Cooperative, Inc. 061721
17. 125 letters received in support of comprehensive river maintenance
18. James Sang. 072021
19. Nancy Isakson, Salinas Valley Water Coalition. 081221
20. Stephanie Hastings, Salinas Basin Water Alliance. 081221
21. Norm Groot, Monterey County Farm Bureau. 100821
22. John Farrow, LandWatch. 101421
23. Audubon California, Clean Water Action et al. 101521
24. Stephanie Hastings, Salinas Basin Water Alliance. 101521
25. Douglas Deitch, Monterey Bay Conservation. 101421
26. Heather Lukacs, Community Water Center & Horacio Amezquita, San Jerardo Cooperative, Inc. 101521
27. Tyler Sullivan, California Coastkeeper Alliance & Sean Bothwell, Monterey Waterkeeper. 101521
28. Elizabeth Krafft, Monterey County Water Resources Agency. 101521

Central Coast Wetlands Group

To coordinate the advancement of wetland science and management on the Central Coast

Moss Landing Marine Labs (831) 771-4495 www.centralcoastwetlands.org

June 5th 2020

To: Emily Gardner

Salinas Valley Groundwater Sustainability Agency

RE: Salinas Valley Basin Groundwater Sustainability Agency East Side Sub-Basin Committee Comments on Chapters 1,3,4

Emily,

Thank you for the opportunity to provide comments on the East Side sub-basin GSP chapters 1,3, and 4.

The document is easy to read and provides valuable information on the unique character of this sub-basin that lies directly west of the Gabilan Mountain Range. My comments will focus on the unique nature of this sub-basin geology (I am not a geologist) and the unique opportunities this formation and its adjacency to the watersheds of the Gabilan Range provide. These geographic conditions support opportunities to develop projects that enhance surface water resources and restore surface water hydrologic functions which will lead to an increase in natural (although difficult to quantify) percolation into gravel layers within this sub-basin that will benefit (although difficult to quantify) groundwater users in the area and perhaps enhancement of the adjacent 180/400 sub-basin.

I have two main observations and several suggested additions to the report (specifically chapter 4.4.4) that would support future Committee discussions focusing on water budgets and the identification of projects that will lead to meeting sub-basin sustainability objectives. I argue that to not recognize the potential that surface water projects can have to increase groundwater storage (although difficult to quantify) would lead to missed opportunities. GSPs in Santa Cruz county have recognized the infiltration potential and have received state funding to investigate, design, and construct pilot projects. Failing to value and prioritize the infiltration potential of this sub-basin and describing projects and programs to further investigate their feasibility may unfairly lead to restrictions on pumping of wells within this sub-basin. Secondly, many of the agencies and stakeholder groups that are supportive and vested in the success of the Salinas Valley GSP are not yet recognized within this document as partners that have completed a number of studies, watershed characterizations and management planning exercises that can support GSP development and implementation success. Below is a list of pertinent (I believe) plans and studies that could benefit the East Side GSP planning process. These plans further document the interest of partner agencies, organizations and stakeholders in efforts to enhance both surface and groundwater sustainability in this watershed and the capacity that these groups can provide to ESGSP project development and implementation.

In short, there are many groups and agencies (mine included) that are committed to identifying and implementing sustainable water projects in the Gabilan watershed that will benefit groundwater sustainability and these parallel goals should be recognized within this GSP and developed into expanded partnerships. These partnerships can develop multi-benefit projects that are valued by all within the community and can be supported by numerous state and federal grant projects that may not be available for projects that solely meet GSA requirement.

Focused Comments:

1) The Report follows a standard framework with other sub-basin GSPs to aid completion of a daunting planning process, but this standardization leads to a missed opportunity to fully recognize, value, or investigate the infiltration potential of this sub-basin. Specifically:

   Chapter 4.4.4 states that "*Natural groundwater recharge occurs through infiltration of surface water from the streams originating in the Gabilan Range*" and that "*Areas with excellent recharge properties are shown in green*", and that "*areas with the highest potential for recharge are along tributary streams.*" These statements are in line with other investigations and plans. The value of these findings, however, are countered by the next paragraph which states:

   "Although Figure 4-8 shows some areas of good potential recharge in the Eastside Aquifer Sub-basin, actual recharge to the productive zones of the Sub-basin could be limited because the discontinuous sediments of the alluvial fans may not provide a continuous path for recharge, and the interfingering clay lenses may retard or prevent deep recharge. This demonstrates the limited utility of potential recharge maps that are solely based on surficial soil properties. This map should not be used exclusively to identify recharge areas that will directly benefit the aquifers in the Eastside Aquifer Sub-basin. Rather, it should be used in conjunction with additional research and investigation tools."

   It is my opinion that the second paragraph disproportionately deemphasized the potential value of these infiltration opportunities to increase water supply to the sub-basin. I recommend that additional information be presented (i.e. another paragraph) that reviews what additional research and investigation tools are available and reference how the Pajaro basin (and others) has already utilized these tools to identify, design, and construct infiltration projects within their basins.

2) The report does not reference many parallel and supportive planning efforts underway by Monterey County Water Resources Agency, the Greater Monterey IRWMP and other groups (Big Sur Land Trust) that would provide the reader with a greater understanding of the potential partnerships that could lead to the development of important multi-benefit projects. Multi-benefit projects come with multi-source funding for projects that increase recharge while also improving aquatic riparian habitat, reducing downstream flooding, and supporting regulatory compliance for the City of Salinas and farmers within the sub-basin. While this expanded scope may be seen as a distraction to the primary goals of the GSP, the multi benefit opportunities and the potential funding support that comes with multi-benefit projects should not be discounted because of this added complexity, specifically because there is support and technical capacity of the other stakeholders available to aid this expandes scope.

   Parallel efforts that should be documented in this report (likely Chapter 2 but referenced in Chapter 4) include the City of Salinas stormwater protection program, flood management by the City of Salinas and Monterey County Water Resources, riparian conservation efforts in the upper Gabilan watershed by Big Sur Land Trust and The Nature Conservancy, Historical ecology work by San Francisco Estuary Institute, Watershed studies and planning completed by CSUMB, CCWG and the IRWMP (Figure 1. Excerpt of Salinas Valley Stormwater Plan), and coordination efforts led by the Monterey Grower Shippers Association to develop agriculture industry led compliance pathways to meet soon to be adopted Regional Water Board Agriculture Order 4.0 (please see below listed references). Each of these efforts supports the enhancement of water resources within this Sub-basin and should be recognized as resources in the design and implementation of the East Side GSP.

3) Loss of surface water hydrologic processes in the Gabilan foothills and eastern side of the East Side Groundwater sub-basin should be recognized as one factor which has led to a reduction in recharge and thus, the classification of the sub-basin as highly vulnerable. Much of the floodplain areas below the Gabilan range have been channelized, reducing the natural infiltration potential to this groundwater basin. Without recognizing this significant reduction in infiltration, any restrictions on groundwater pumping to increase groundwater sustainability will unfairly restrict some farming activities (pumping) while not recognizing and/or managing the impacts of other farming activities (channelization of natural waterways). If future water budget findings suggest that some irrigation pumping must be reduced (leading to a reduction in agriculture) then integrating reduced farming with reclamation of flood plain areas (and hence infiltration) would be the most efficient method to meet water budget needs.

4) The current document does not recognize (in addition to the planning efforts) the skills and capacity of partner agencies and stakeholder groups. These skills and capacities can be leveraged to increase the scope and breadth of groundwater management and project development. Two examples of this were noted in the Sub-Committee meeting. Amy from the Monterey County Water Resources Agency noted that they monitor many wells not listed within the report and have made these data available to the GSA. Similarly, the consultant noted that the GSA does not own land nor has regulatory authority of the lands within this sub-basin. This is true, but fails to recognize partner groups that do have these capacities and are interested in developing multi-benefit projects within this watershed. Limitations of the GSA should not limit the opportunities identified within the plan but should be rectified through identifying others that have those capabilities and initiate partnerships to benefit from those skills and abilities.

5) Finally, Surface water management and groundwater infiltration can be accomplished in unison, and if successful, will lead to numerous benefits to landowners, agriculture industry, adjacent municipalities, county agencies, down stream flood prone communities and the East Side Groundwater Sub-basin. Because of the unique character of the geology in this area, these multi-benefit opportunities should be fully recognized and integrated into this planning process. Projects should be identified that help increase our understanding of this sub-basin and the benefits such multi-benefit projects can have on GSP success. The Greater Monterey County IRWMP process (which Salinas GSA has been invited to become a member) provides a unique and valuable forum from which to investigate these partnerships.

Figure 1. Map of Gabilan watershed priority restoration and management goals. Actions listed in the legend and depicted on the map are described in Table 1.

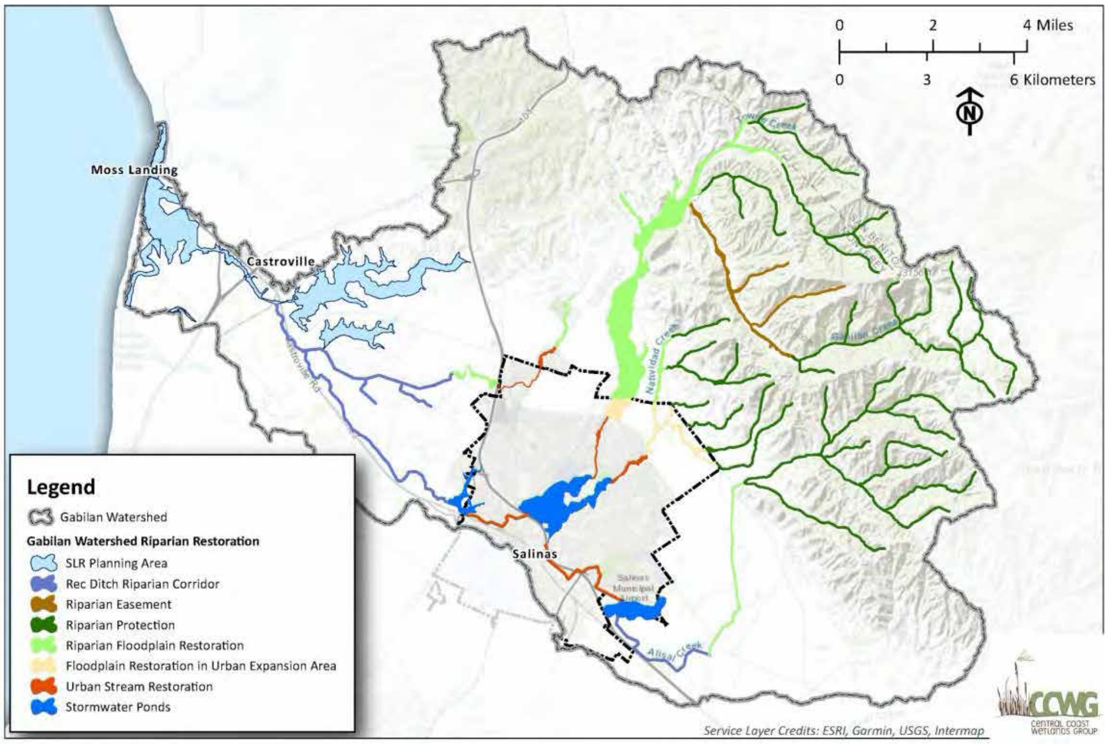

Table 1. Gabilan watershed priority restoration and management goal descriptions (From Stormwater Resources Plan)

Action descriptions for Figure 7	**Goal: Stream miles**	**Goal: Acres of habitat**
SLR Planning Area: Agricultural land owners have committed to working with our team to develop a farm adaptation and resiliency program that will transition vulnerable agriculture lands to creek and wetland habitat and provide critical connectivity among isolated areas of habitat refugia, increasing coastal habitat complexity and resilience to SLR.	N/A	2482
Rec. Ditch Riparian Corridor: increase flow capacity while enhancing wetland habitat and water quality by creating a linear restoration project along the Reclamation Ditch between the City of Salinas and Moss Landing. This enhanced drainage system will support flood control and environmental goals while also providing a recreational opportunity to north Monterey County residents (Figure 8).	15	444
Riparian Easement: establish riparian zone protection easements in areas of the upper Gabilan watershed that have been identified in future land use maps as agricultural zones.	8	246
Riparian Protection: in areas of current grazing land use, implement riparian zone cattle exclusion fencing in the upper Gabilan watershed. In other areas, investigate necessary management actions to establish proper riparian zone protection.	68	1612
Riparian Flood Plain Restoration: Storm runoff from the Gabilan Mountains presents one of the greatest flood risks to Salinas. As runoff passes through agricultural fields it picks up sediment, nutrients, pesticides and other pollutants that are further concentrated as flow continues downstream to Carr lake and onward to Moss Landing Harbor and Monterey Bay. This action proposes to negotiate the seasonal lease or land sale of up to 247 acres of floodplain lands around the City of Salinas and restore proper riparian floodplain functions.	21	1617
Floodplain Restoration in Urban Expansion Area: Floodplain infiltration and natural corridor enhancement will be integrated into future development plans for the City of Salinas eastern expansion zone.	5	247
Urban Stream Restoration: Work with the City of Salinas and existing urban stream restoration programs including CSUMB's Return of the Natives to implement riparian zone restoration actions within the urban core of the City of Salinas.	9	216
Stormwater Ponds: Changes in rainfall patterns, rising coastal ocean levels and upstream land uses are leading to increased flooding of the Lower Gabilan/Salinas Valley watershed. Summer water resources are overburdened and Salinas Valley water purveyors are looking to identify	N/A	994

Strategic Recommendations for consideration:

- The Salinas Valley GSA should join GMC-IRWMP as a voting member to increase collaborative opportunities with partner agencies/stakeholders and to participate in the development of multi-benefit projects for state funding.
- Review 2019 IRWMP Stormwater Plan as a valuable analysis of watershed opportunities to retain and reuse winter stormwater resources. Management concepts within the Stormwater Plan that could benefit GSA goals should be identified within the plan.
- Develop/prioritize a pilot project focused on identifying infiltration potential of areas identified in various geologic surveys and maps (see Pajaro GSA model).
- Recognize in the Plan the likelihood that GSA infiltration opportunities lie outside (east) of the GSA boundaries.
- Recognize in the Plan the value of infiltration opportunities in this basin even though direct quantification of benefits is challenging.

Thank you for your consideration of these comments as part of the East Side Sub-Basin planning process.

Ross Clark

Director Central Coast Wetlands Group
Moss Landin Marine Labs
East Side Sub-Basin Committee Member

Previous Studies and Reports:

Storm Water Resource Plan for the Greater Monterey County IRWM Region:
http://www.greatermontereyirwmp.org/documents/planning/

Improving California's Riverine and Wetland Management Efforts:
https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/RLF-CCWG-final-report-2019.2.22.pdf

Comprehensive Watershed Management Solutions to Nonpoint Source Pollution in the Salinas Valley and Pajaro River Basin: https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/comprehensivewatershedmanagemensolutionstononpointsourcepollutioninthesalinasvalleypajaroriverbasin1997.pdf

Northern Salinas Valley Watershed Restoration Plan- Final Report 1997:
https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/northern-salinas-valley-watershed-restoration-plan-final-report-1997_compressed.pdf

Final Report: Monterey County Water Resources Agency- Reclamation Ditch Management Strategy: https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/final_rec_ditch_management_r.pdf

Final Report: Monterey County Water Resources Agency- Reclamation Ditch Watershed Assessment: https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/final_rec_ditch_management_r.pdf

Historical Gabilan Maps: https://drive.google.com/open?id=0B4qUY-zc8V-WLThySTZoWDFKQzA

Natividad Creek Wetland and Upland Habitat Restoration Plan:
https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/natividadcreekwetlanduplandhabrestplan.pdf

Natividad Creek, Creek and Wetland Restoration Plan Phase II – Expanding the Vision:
https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/natividadcreekwetlanduplandhabrestplan-1.pdf

Update to Natividad Creek Park Restoration Plan- Water Reuse and Flood Protection around V.R. Barton School and Laurel Lake: https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/updatenatividadcreekparkrestplanwaterreuse.pdf

Santa Rita Creek at Ferrasci Park Habitat Restoration Assessment:
https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2020/01/Santa-Rita-CRAM-Report_final_1.27.16.pdf

School Yard Habitat Project – Santa Rita Elementary School:
https://drive.google.com/open?id=1TZ-Rg1rNmybZdire0N782_YH02-cWYt8

Castroville Community Outreach Summary Report: https://www.mlml.calstate.edu/ccwg/wp-content/uploads/sites/23/2019/12/Castroville-Community-Outreach-Report_4.7.17.pdf

Gmail

Emily Gardner <gardnere@svbgsa.org>

Recommendations for Langley and other subbasin GSPs related to drinking water users

6 messages

Heather Lukacs Fri, Jul 10, 2020 at 2:06 PM
To: gardnere@svbgsa.org
Cc: Donna Meyers <meyersd@svbgsa.org>, Gary Petersen <peterseng@svbgsa.org>, Horacio Amezqutia
Thomas R Adcock Justine Massey

Hi Emily, Gary, and Donna,

I appreciate the process allowing for comment on the early drafts of the subbasin GSPs.

Tom, I have included you so that you can see Figure 3-5 that I referenced during my comments at today's meeting - in order to help make sure Alco and Pajaro Sunny Mesa CSD boundaries are accurately represented (see attached), and also because you indicated interest in helping support outreach to water systems.

We at CWC are happy to support in identifying, ground-truthing, and outreach to drinking water users in the Langley Subbasin and other subbasins in the Salinas Valley.

The first step we recommend is to generate a list of the following to support outreach and also to include in Chapter 3 of the draft subbasin GSPs:

- Public water systems - which serve over 15 connections
- State and local small water systems - which serve between 2-14 connections

We at CWC currently have lists for both types of systems from Monterey County Environmental Health (along with contact information for each water system). This information was also used by the GSP consultants in the 180/400 GSP so they should also have these lists with location and water quality information for all water systems in the subbasins.

Next, we recommend creating maps of the location, water quality, and other information of all drinking water supply wells - which came up during today's meeting. For the 180/400 Foot Aquifer GSP, Figure 7-9 Public Water Supply Wells was included together with Appendix 7E (see attached) which has water system names, well construction information, coordinates, and monitoring data range. (see more on this below).

Lastly, these maps and lists can then be shared with local drinking water users who can provide feedback and help groundtruth the information. This could be part of a drinking water workshop - is the information we have accurate? Given this information, is the monitoring network accurate? Are drinking water users collecting other information that could be added to this plan?

I look forward to discussing this and also more specific recommendations (see below) for Chapter 3 of the Subbasin GSPs.

Thank-you,
Heather

Recommendations for Chapter 3 of Subbasin GSPs

- **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.

- **Revise Chapter 3 to include a map of the service areas of all of the state and local small water systems 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.
- **Update water system boundaries in Figure 3-5** (Langley, 6/28/2020 GSP) to reflect that Alco no longer operates wells in this area, and update Pajaro Sunny Mesa CSD water system boundaries.
- **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).
- **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/.

--

Heather Lukacs, PhD
Pronouns: She/Her/Hers
Director of Community Solutions
Community Water Center

[redacted]
[redacted] CA 95076
[redacted]
[redacted] CA 95814
[redacted]

All CWC staff are currently working remotely. Please reach all staff via email and cell phone.

2 attachments

Central Coast Regional Water Quality Control Board

October 16, 2020

Emily Gardner
Deputy General Manager
Salinas Valley Basin Groundwater Sustainability Agency
gardnere@svbgsa.org

Dear Ms. Gardner:

CENTRAL COAST WATER BOARD COMMENTS ON THE SALINAS VALLEY EASTSIDE SUBBASIN GROUNDWATER SUSTAINABILITY PLAN: CHAPTERS 5 & 7

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) is a state agency that implements state and federal water quality laws within the central coast region. The Salinas Valley groundwater basin falls within the jurisdictional area of the central coast region and as such, the Central Coast Water Board has an interest in monitoring, preserving, and restoring water quality within the basin. Central Coast Water Board staff has reviewed draft chapters 5 (Groundwater Conditions) and 7 (Monitoring Networks) of the Groundwater Sustainability Plan (GSP) prepared by the Salinas Valley Eastside Subbasin Groundwater Sustainability Agency (GSA) and our comments on the groundwater quality-related portions of these chapters are included herein.

Chapter 5. Groundwater Conditions

- Section 5.4.4, page 5-36. This section states that the listed constituents will be *considered* for inclusion in the GSP monitoring program. The Central Coast Water Board would like to request more specificity in the GSP regarding which wells will be sampled, the areas in which these wells are located, and the constituents that will be analyzed at each well. Due to the prevalence of arsenic in the central coast region and its inclusion in the monitoring programs of other Salinas Valley subbasins, the Central Coast Water Board recommends adding arsenic to the list of constituents monitored under the GSP and recommends the GSA establish sustainable management criteria for this constituent.

Chapter 7. Monitoring Networks

- Section 7.5, *Water Quality Monitoring Network.* This section states that the monitoring network will include a combination of public supply wells, on-farm domestic wells, and agricultural supply wells. The Central Coast Water Board requests more specificity in the GSP regarding which constituents will be monitored in each of these types of wells. If these details will be included in a forthcoming appendix, please elaborate on when you expect these details or appendix will be available. Regarding the on-farm domestic and irrigation wells, we appreciate the GSA tracking and incorporating data from these wells that are a part of our Irrigated Lands Program (ILP).

- The overall lateral "density" of wells included in the monitoring network appears to be sufficient, however, it is not possible to determine if vertical coverage is adequate without knowing the relative depths of monitoring wells. Please provide additional detail on this topic in the GSP, or elaborate on when this might be included in the future.

Central Coast Water Board staff thanks the GSA for the work being done to sustainably manage groundwater resources in the Salinas Valley and appreciates this opportunity to provide comments. If you have questions or would like to discuss these comments in greater detail, please feel free to reach out to James Bishop, Daniel Pelikan, or Diane Kukol at the Central Coast Water Board:

James Bishop, P.G.
Engineering Geologist
Central Coast Water Board
James.Bishop@waterboards.ca.gov
805-542-4628

Daniel Pelikan, P.G., C.Hg.
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Diane Kukol, P.G.
Senior Engineering Geologist
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Diane.Kukol@Waterboards.ca.gov
805-542-4637

Sincerely,

Diane Kukol Digitally signed by Diane Kukol Date: 2020.10.16 11:08:33 -07'00'

for Matthew T. Keeling
Executive Officer

cc:

Matt Keeling, Central Coast Water Board, Matt.Keeling@Waterboards.ca.gov
Diane Kukol, Central Coast Water Board, Diane.Kukol@Waterboards.ca.gov
Daniel Pelikan, Central Coast Water Board, Daniel.Pelikan@Waterboards.ca.gov
James Bishop, Central Coast Water Board, James.Bishop@Waterboards.ca.gov
Natalie Stork, State Water Resources Control Board, Natalie.Stork@Waterboards.ca.gov

Sarah Sugar, State Water Resources Control Board, sarah.sugar@waterboards.ca.gov
John Ramirez, Monterey County Environmental Health Bureau, Ramirezj1@co.monterey.ca.us

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Gmail

Emily Gardner <gardnere@svbgsa.org>

comments on Eastside sub-basin projects

1 message

Christopher Bunn Fri, Oct 30, 2020 at 1:23 PM
To: Emily Gardner <gardnere@svbgsa.org>, Derrik Williams <dwilliams@elmontgomery.com>

Emily and Derrik,

Here's a short list of comments I have so far for the Eastside sub-basin projects discussion.

regards,
Christopher

1. How do 180/400 pumping, salt water intrusion and proposed GSP projects affect the cone of depression and/or the deficit in the Eastside?

2. How does municipal pumping in the city of Salinas and city of Castroville affect the cone of depression and/or the deficit in the Eastside?

3. If the above activities are not modeled in terms of their effects on the cone of depression, the Eastside deficit, Eastside well levels, why not? What will it take to model them?

4. How can we proceed without such a model? Constructing projects, proposing management actions and calculating benefits, assessments, fees, etc., will mean building equations with an unknown variable.

5. Reservoir operation and river management
    1. Eastside Canal project (regardless of diversion point) - volume of available water, timing of flow and evapotranspiration loss will all be affected by how the reservoirs are operated, how the river is managed (invasive removal, native overgrowth removal, sediment removal) and how that affects moving water downstream to canal diversion point.
    2. If 180/400 & municipal issues are modeled and show interplay with the cone of depression, Eastside deficit and well levels, then that provides a rationale for the Eastside having a certain degree of involvement in reservoir operation and river management benefits in terms of moving water downstream to the SRDF for CSIP, CSIP optimization, CSIP expansion, etc.

Central Coast Wetlands Group
To coordinate the advancement of wetland science and management on the Central Coast
Moss Landing Marine Labs (831) 771-4463 www.centralcoastwetlands.org

November 6, 2020

To: Emily Gardner,

From: Ross Clark

I would like to thank the Salinas Valley GSA staff and Montgomery and Associates for the opportunity to provide comments regarding project selection for the East Side Sub-Basin project identification effort.

I have some basic observations I would like to make (given my limited hydrogeomorphic knowledge) and then demonstrate my thought process regarding identification of multi-benefit projects that will increase groundwater recharge and sustainability.

First, let's recognize that infiltration is occurring within a fairly impacted sub-watershed. It is my assumption that most of the water extracted annually from the East Side subbasin is recharged from surface water within the basin boundaries and within the watershed east of the boundaries (Gabilan Range). If this assumption is fairly accurate, then projects and practices that enhance recharge within these areas will likely benefit (while in many cases being difficult to quantify directly) groundwater sustainability.

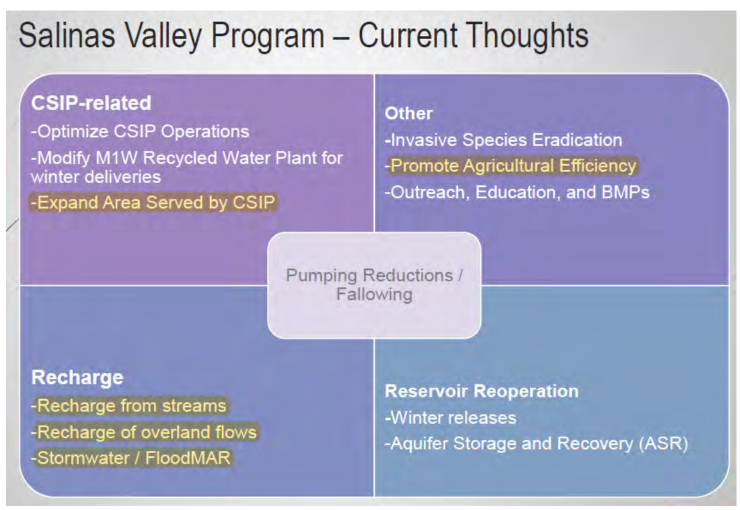


Figure 1 Slide from GSA subbasin meeting outlining project options. Highlighted options most likely effective within this subbasin.

Furthermore, many of the Salinas Valley project opportunities identified for the 180/400 plan will likely have limited benefits within the East Side Basin. Management of dam operations will not directly benefit East Basin recharge. Specifically, current expansion opportunity areas for CSIP do not extend into the East Basin but evaluation of expansion opportunities have been requested by fellow committee members.

Options likely to have the greatest benefit for local groundwater sustainability include reduced groundwater extraction through efficiency and fallowing (not a preferred option) and increased recharge through a combination of Flood-MAR, overland and stream recharge projects, and thus, I suggest should be the focus of our ongoing conversations.

Below I make some general observations about the potential of various types of passive recharge projects and then recognize the multiple environmental and water resource benefits of these projects and the efforts of partners in the watershed to implement similar projects. My primary observation is that within this subbasin, there are many multi-benefit projects that partner agencies, municipalities and organizations are interested in partnering with the SVGSA to implement and these partners are able to contribute time, resources, and funding (i.e. state grants) to complete.

Observation 1) The power point pictures from the recent introduction to project options fail to visually recognize the existing recharge capacity within local creeks and rural and agriculture lands. My mockup of the direct infiltration slide (Figure 2a) recognizes the benefits of recharge from the existing creek and floodplain areas. This simple recognition will help the Eastside committee better recognize the existing infiltration capacity of the watershed needed while discussing the viability of different projects and actions to increase recharge.

Observation 2) Much of the lower Gabilan, Natividad, Santa Rita and Alisal watersheds have been seriously degraded by land form changes (agriculture and urban) that have encroached into creeks and their flood plains (Figure 3). These floodplain areas provided many hydro and biological benefits to the watershed (including recharge) that have been lost or highly degraded. <u>There are many opportunities within this area to restore these fluvial processes to benefit multiple water resources including natural recharge.</u>

Figure 2b attempts to demonstrate the increase recharge potential if floodplain and off channel aquatic habitat areas were reclaimed and restored.

Increases in recharge potential from floodplain, riparian and off-channel aquatic habitat restoration project can be achieved by focusing on two processes. 1) flood waters that are allowed to flow out onto historical flood plains during storm events will cover larger areas of permeable geology and thus more water will percolate through more of those soils during flood discharge events.

2) Restored floodplain and riparian habitat within the watershed and foothills can slow discharge rates and thus restore more natural hydrographs that lengthen the time water is flowing through these restored watershed riparian areas and downstream flood plain areas. These observations suggest that by restoring priority portions in the hills east of Salinas and within the high recharge potential soils closer to the City (figure 2b), we will achieve an increase in the active area and duration of storm related recharge events.

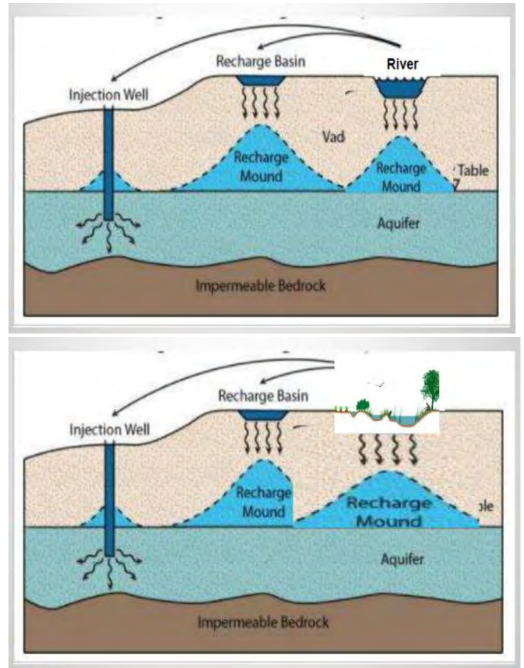


Figure 3 (a) Mockup of Recharge Slide 9 recognizing recharge value of existing creeks and floodplain, (b) modified picture recognizing recharge value of restored creek and floodplain width.

Figure 3 is a Google Maps areal of a portion of the Gabilan Creek drainage system just above the City of Salinas, portions of this drainage retain some riparian and floodplain area while adjacent segments are channelized (Salinas Valley Reclamation Ditch), limiting recharge, increasing flow rates and sediment down stream to the City boundaries where flooding and sediment deposition cause damage and maintenance expense. This screen shot shows that much of the lands directly adjacent to the “creek” are not in active farming and thus reclamation of flood plain, riparian habitat and recharge potential may not affect agriculture production while increasing recharge. Incentives (easements, maintenance support) to land owners through state bond funding are available to restore this exact type of drainage system and would be competitive for funding if the projects were coordinated with the GSA and listed within the Eastside Basin plan.

Figure 3 Gabilan creek above the City of Salinas with reduced of riparian and floodplain due to encroachment. Note opportunity areas along creek to reclaim lost floodplain while limiting loss of agriculture production.

Figure 4 is a screenshot of the Gabilan Creek just up stream of Crazy Horse and San Juan Grade that has been encroached upon by agriculture and greenhouses. Similar floodplain loss is extensive within this portion of the valley. These floodplain areas have been identified as optimal for recharge. Thus programs, projects and agreements among resource partners and landowners could be developed that increase infiltration within these highly porous soils.

Observation 3). Many of the project options listed in Figure 1 are either highly engineered projects (often expensive) or operational changes to existing infrastructure (reservoirs, farm pumping and irrigation, CSIP). The focus on such projects is often the result of needed assurances that we are achieving our quantifiable goals. The recharge benefits of drainage enhancements and off channel restoration activities are more difficult to quantify and therefor more difficult to include in a cost/benefit analysis.

However, because 1) our optimal goal is to achieve sustainable groundwater by some future date as defined by quantifiable groundwater elevations, and 2) My understanding is that we need to either reduce pumping or increase recharge by 7% to achieve sustainability, enhancement of natural recharge processes has significant potential to benefit the subbasin.

The existing natural drainage network and open lands continue to provide significant recharge to the basin and I would recommend that we use this subbasin planning process to prioritize short term/low cost projects that enhance natural recharge processes for study and pilot implementation. We can include processes to transition to higher cost engineered solutions if our multi-benefit projects do not achieve the needed recharge by a determined date.

Figure 4 Floodplain area within the Lower Gabilan range lost to agriculture

Based on these observations, I suggest that we include multi-benefit surface water enhancement projects as priority short term "recharge from streams" project to investigate and implement within this Subbasin. Below I will identify some examples of projects that could be investigated, planned and implemented through a multi-stakeholder process (that recognizes the specific objectives of the Eastside Subbasin plan) largely funded through outside grants and largely orchestrated by partner agencies and organizations (with input from the GSA). The IRWMP team has submitted a grant proposal to support a watershed coordinator position to aid such multi-benefit, multi-stakeholder projects.

Project oppor tunities in the Eastside Sub-basin to potentially include in management plan.

Indirect Recharge Projects:

1. *Creek and Floodplain Restoration Program.*

The county reclamation ditch network was designed and constructed before 1907 and is now, due to changes in agriculture and the expansion of our urban footprint, critically insufficient to provide the flood protection to agriculture and urban properties adjacent to the system. Further up in the foothills, agriculture and grazing encroachment on natural stream corridors has further reduced the flood attenuation capacity of the drainage system and increased discharge rates. Loss of this creek and floodplain area and condition has reduced recharge potential by moving water out of the subbasin more rapidly than historically. This increase in flow rates leads to increases in erosion and sedimentation as well as localized flooding along the drainageway. Many areas adjacent to the Gabilan, Natividad, and Alisal creeks are not in agriculture production, likely due to these floodway related challenges and risks.

CCWG and other organizations have been successful in the lower Gabilan Watershed to work with farmers to gain access to these less productive and problematic lands adjacent to degraded waterways, restore hydraulic processes and reduce (or at least not exacerbate) risks to adjacent productive farmlands.

Working with property owners in these watersheds where recharge potential is greatest to obtain linear easements along this drainage network and complete floodplain enhancement efforts can be a low cost, multi-benefit program that works with farmers to improve recharge within their groundwater basin.

2. *Riparian restoration within the foothills*

Riparian degradation and floodplain loss has occurred up stream within the Gabilan Range due to increased farming and grazing activities. Some of these areas provide significant recharge potential as well as flood attenuation and habitat/water quality benefits. By working with The Big Sur Land Trust and other land trust organizations, areas with high recharge potential can be identified for floodplain and riparian restoration, fencing and easement acquisition that benefit the landowner and enhance water resources and infiltration rated while reducing flooding to other agriculture lands downstream.

3. Permeable Soils Management Program

Soils within the Gabilan watershed within the Eastside Subbasin have significant recharge potential and programs and agreements could be established to increase the functionality of these basin areas. Such programs may include:

a. Flooding of highly porous soils. Large portions of the high infiltration soil zones have been restricted from winter flooding. Reintroduction of some of these areas (flooding of active farm lands) may be feasible for some farming and nursery operations.
b. Identify nonproductive lands with high permeability to allow to flood. Flood storage and infiltration projects in the Pajaro GSA Basin have shown promise but are challenged by water rights conflicts and operations and maintenance costs. Multi-benefit projects along the floodway that achieve the same result (increase in floodplain infiltration capacity) may not be in conflict with water rights and may have access to grants from partner organizations to provide construction and O&M funding.
c. Identification of high recharge soils should be studied and programs and agreements developed with land owners to protect these areas from further loss of recharge potential. Significant portions of these infiltration areas are currently in strawberry production that may cover permeable soils with plastic, significantly reducing recharge potential. Crediting farmers that adopt recharge friendly practices (vegetated furrows, see infiltration study completed by R. Smith et al.) within high recharge potential zones may increase on-field infiltration (and reduce off farm discharge) significantly.
d. Work with Monterey County to limit further impervious surface development (without on-site infiltration) within these priority infiltration areas. Many communities (i.e. Scotts Valley) are spending millions of dollars to retrofit urban development to increase on site infiltration within groundwater infiltration priority areas. Limiting loss of infiltration prior to development will save money and protect current and future subbasin recharge capacity.

4. Farmer incentive programs (water credits) to increase infiltration.

Some GSA districts (Pajaro) have implemented pilot programs to credit land owners that provide additional groundwater recharge (i.e. water credit framework). Most of these pilot efforts have focused on off channel infiltration ponds but this model could be expanded to include creek and floodplain enhancements as well. Crediting for infiltration within flow through channels and floodplains may be less efficient and difficult but could be based on a modeled increase in infiltration during flood events.

5. Integrated programs to manage pumping

Irrigation efficiency can be a cost effective way to reduce over pumping. The Monterey County RCD and UC Extensions have a number of voluntary programs that the GSA could encourage landowners to take part in to reduce pumping rates. These programs can help reduce the need for pumping restrictions and farm land fallowing.

Farmers that participate in above listed programs that take land out of production to implement multi-benefit programs should receive GSA recognition as part of a fallowing program. Thus, areas that are vulnerable to flooding and selected for floodplain restoration may also benefit from recognition of reduced pumping. Similarly, if additional voluntary or mandatory fallowing is necessary in the future to meet groundwater sustainability goals, such fallowing should be done along drainage corridors in coordination with creek and floodplain restoration programs to achieve multiple groundwater benefits from any loss in production.

Summary:

We have determined that there are significant and unique recharge opportunities within the Eastside Sub-basin (Figure 5. 2019 Salinas Stormwater Plan). Many of those opportunities should be investigated further (and projects identified) with aid from partner organizations. GSA support and adoption in concept of these project opportunities is needed to help resource partners seek funding, establish relationships with land owners and coordinate activities among multiple agencies. Project viability and success will be increased if land owners know that these projects will help ensure sustainable groundwater resources for their productive lands. The multiple flood reduction, water quality, habitat and

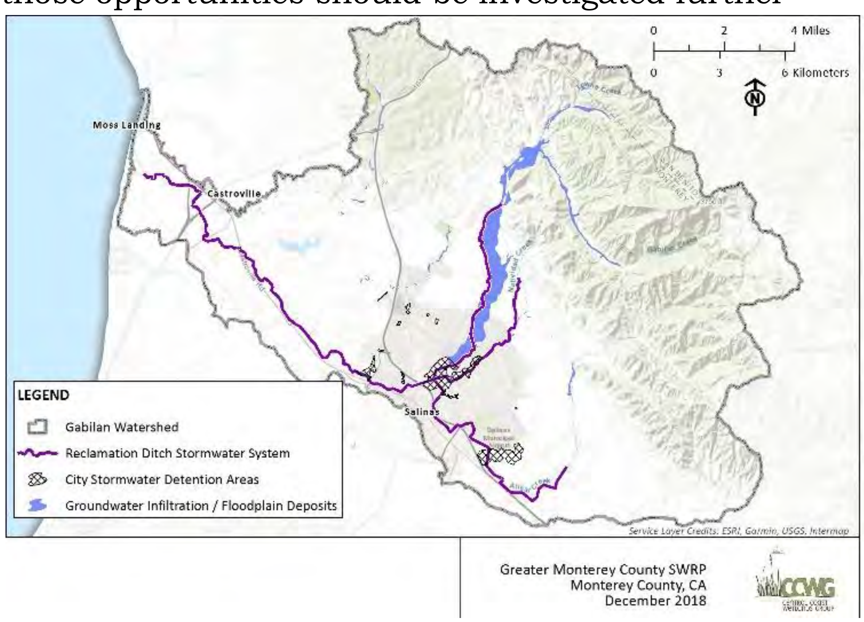


Figure 5 Map of high permeability soils (blue) that could be restored adjacent to the Salinas rec ditch flood conveyance system (magenta).

sustainable agriculture benefits of these projects make them high benefit, low costs opportunities that should be investigated further.

Thank you for the opportunity to outline some of my ideas as have developed through my years working as a member of the multi-stakeholder Greater Monterey County IRWMP.

Sincerely

Ross Clark

Director

From: Christopher Bunn
Sent: Wednesday, November 11, 2020 3:22 PM
To: Derrik Williams <dwilliams@elmontgomery.com>
Subject: Somavia Road area

Derrik,

The Somavia Road area I referenced is highlighted in the attached screenshots. Three ranch owners right in that spot are Bengard, Gill, Marahart. There's some serious water right there. Wells pumping around 3000 gpm at around 25 feet of draw-down. Plus, there's apparently good recharge.

A well field there could benefit both the Eastside and the Pressure (CSIP expansion), spreading costs across two sub basins. It's directly adjacent to the Eastside and not that far to the proposed CSIP expansion area.

Christopher

<image001.png>
<image002.png>

Salinas Basin Water Alliance

P.O. Box 247, Salinas, CA 93902

SBWA

SALINAS BASIN WATER ALLIANCE

March 10, 2021

Chair Tom Adcock
SVBGSA Advisory Committee
P.O. Box 1350
Carmel Valley, CA 93924

Dear Chair Adcock and SVBGSA Board Members,

On behalf of our directors and members, we are writing to voice several concerns about the GSA's process for approving and promoting projects and management actions for subbasins throughout the Salinas Valley.

First, we are concerned about the agency's timelines for subbasin committees to approve water allocation policies *before* disclosing or approving water budgets. We are acutely aware that the agency's mission is to ensure the sustainability of groundwater throughout the valley. How can we accomplish this if staff-recommended policies to committees are disconnected from the actual amounts of water being used annually in each subbasin? We have seen this order of operations in every one of the subbasin meetings so far and are concerned it flies in the face of the agency's extraordinary efforts to be transparent and effective.

Secondly, we are concerned about how the agency is formulating water budgets. We represent more than 37,000 acres owned and farmed throughout the valley. From our experience, the data being used from 2013 and earlier is not accurate to water usage today, self-reporting data is not a sufficient safeguard for sustainability, and thirdly, any valley-wide formula based on crops is insufficient as temperatures, soil composition, and other conditions vary. If we are to accurately measure and equitably discuss water use throughout the Salinas Valley, we must draw on water metering data to create water budgets.

We appreciate the opportunity to bring our valley-wide experience to the table and look forward to working with all the subcommittees to find sustainable solutions for everyone in the Salinas Valley.

Sincerely,

DocuSigned by:

George Fontes

George Fontes, President, Board of Directors
Salinas Basin Water Alliance

MONTEREY COUNTY
WATER RESOURCES AGENCY

PO BOX 930
SALINAS, CA 93902
(P): 831-755-4860
(F): 831-424-7935

BRENT BUCHE
GENERAL MANAGER

STREET ADDRESS
1441 SCHILLING PLACE, NORTH BUILDING
SALINAS, CA 93901

March 12, 2021

Donna Meyers, General Manager
Salinas Valley Basin Groundwater Sustainability Agency
1441 Schilling Place
Salinas, CA 93901

Re: Groundwater Sustainability Plan for the Eastside Aquifer Subbasin

Dear Ms. Meyers:

Monterey County Water Resources Agency (MCWRA) staff has reviewed Chapters 1-5 and 7 of the draft Groundwater Sustainability Plan for the Eastside Aquifer Subbasin.

MCWRA has the following general comments on the draft chapters:

- Some sections are not completed or indicate future revisions and updates. MCWRA looks forward to an opportunity to comment on those when completed.
- Chapter 3, Section 3.4.3 states: "Extraction is self-reported by well owner, however, it is not known what percentage of wells are reported this way." MCWRA does have annual statistics on the percentage of wells that report annual extractions of those that are required to report under Ordinance No. 3717 and 3718.
- The header for Chapter 3, Section 3.6.6 is misleading. Ordinance 5302 was not a "County Moratorium on Accepting and Processing New Well Permits." While the ordinance did temporarily prohibit accepting or processing well construction permits for certain well types in certain areas of the County, MCWRA suggests using language that captures the temporary nature of the prohibition. In addition, Ordinance 5302 expired in May 2020 and was not replaced by another ordinance; the GSP should be updated to reflect this status.
- Chapter 5, Section 5.1.3: Are all of the wells depicted in Figure 5-9 dedicated monitoring wells? They are characterized in this chapter as "monitoring wells;" if not dedicated monitoring wells, it would be helpful to describe them as monitoring "locations" and/or describe the type of well (e.g. irrigation, monitoring, etc.).
- Chapter 7, Section 7.3.2 discusses the need to develop "crop data and crop duty multipliers" for areas where agricultural groundwater pumping is not reported. The Salinas Valley Integrated Hydrologic Model (SVIHM) has extensive crop data coverages for the model domain that may be of use for this task.
- Chapter 7, Section 7.9: The list of fields in the SVBGSA DMS HydroSQL database includes "well owner." Is this information publicly accessible? This would appear to conflict with the Information Practices Act of 1977, which protects well owner name and address details that are typically redacted from Well Completion Reports that are accessible under CA Water Code Section 13752.

MCWRA has provided other minor and/or editorial comments on the chapters of the Draft GSP to Montgomery & Associates in Word documents that were supplied for that purpose.

MCWRA appreciates the opportunity to comment on the draft GSP for the Eastside Aquifer Subbasin. If you have any questions regarding the enclosed comments, please contact Tamara Voss, Associate Water Resources Hydrologist via email at vosstl@co.monterey.ca.us or by phone at 831-755-8914.

Sincerely,

E-signed 3/12/2021

Brent Buche
General Manager

Gmail

Emily Gardner <gardnere@svbgsa.org>

Recharging the Salinas Valley subbasin groundwater and aquifers
2 messages

Yahoo Mail <sangjames@yahoo.com> Mon, Apr 19, 2021 at 11 39 PM
Reply-To: Yahoo Mail <sangjames@yahoo.com>
To: Donna Meyers <meyersd@svbgsa.org>, Emily Gardner <gardnere@svbgsa.org>, Gary Petersen <peterseng@svbgsa.org>, Ann Camel <camela@svbgsa.org>, Harrison Tregenza <tregenzah@svbgsa org>, BoardSVBGSA <board@svbgsa org>
Cc: [redacted]

Hello,

The following are my thoughts on recharging subbasins . Please pass this email to all the Sub committee chairpersons and members and anyone interested.

1. The Eastside sub-basin is currently and has been overdrawing about 20,000 acre feet of water for years! . They are recommending Managed Aquifer Recharge, which is having each farmer dig infiltrating basins in order capture overland flow and stormwater runoff from the Gabilan Range.The farmer would be incentivized by credits for the amount of water inflitrated.
2. They are recommending Floodplain restoration. This is building large basins to capture runoff. Project is:
   a. Eastside Sub-basin Project 6, detention pond, detention pond located at Natividad Road (Gabilan Ck.), detention pond located at Old Stage Natividad, detention pond located at Old Stage Alisal , detention pond located at Old Stage Upper/Lower, detention pond located at Carr lake, detention pond located at Airport . The cost is over $24,000,000.00
3. Gabilan Creek Diversion and Groundwater recharge. This moves water from the Gabilan Creek to a basin. The cost is over $10,000,000.00
4. Soledad Diversion. Water is moved from the Soledad area to our Eastside. The cost is over $127,000,000.00.
5. Scalping facility. Sewage plant. Cost is over $14,000,000.00.
6. Eastside Basin Project 4. This project moves water. Cost is over $139,000,000.00.

Please go to SVBGSA.org for more detail .

Other recommended projects are building pipeline from Nacimiento Dam to San Antonio Dam, cleaning the Salinas River of weeds , creating floodplains on this river.

To me, these costs seem high, but I really worry that the projects will not work for the regular farmer. They have projects to try to recharge the water aquifers, but how will they know that each individual well water level will rise? Each well is set a certain level of well water level that they cannot go below, otherwise they will probably set restrictions on if you can use any well water or limit the amount of water used. I suggest that the minimum threshold(the lowest level of well water that you can go) be lowered to 10 feet below this level, this lower level will allow the farmer to use his well water for a few more years in case we get into a another severe several years of drought! This allows more time for the projects to be implemented to hopefully increase the well water levels. If the wells get to that minimum threshold , and the farmer is told that he cannot pump his regular amount, I believe that he will get upset and go to court to settle the issue!

This is how I would solve this problem. I would focus on recharging each individual well. All of the projects have focused on using storm water to fill the water aquifers. I would have each farmer build swales , trenches or subsoil around his well in order to help recharge his well. If a farmer builds these close to his well, he has a good chance of filling his well with rainwater. Swales, Trenches or Subsoiled land creates large holes in the ground in order to capture the rainfall. These swales are made deep into the ground , which will capture the rain and protect this precipitation from evaporation caused by heat and the wind. If hole is deep enough the water will be absorbed into the ground and become groundwater and later go the water aquifer. This should happen even in hardpan soil. (Deep Soil Ripping as an effective and affordable water capture tool), written by Amanda Krause, et a. There are many you tube videos on swales and rainwater harvesting. This is a project that the farmer will like, because it directly benefits him!

Each acre of land can capture 1 acre feet of water at 12 inches of rainfall if you have swales or subsoil the ground. The farmer can calculate how many acres of his land he needs to swale or subsoil. If he uses 3 acre feet of water a year, he would need to subsoil or swale 3 acres. If he uses 20 acre feet of water, then he can swale or subsoil 20 acres of land. He should in equilibrium in water usage and not see his well water go down. If his well is not going up , the captured rainfall will show up as increase groundwater levels or as a spring on his land!! This is a simple solution and very workable! It is better than spending millions of dollars and not knowing if the farmer will see his well water go up. Remember the recommended projects will take years to implement, if we have continuous dry years , the farmer not be able to farm. The subsoiling and swale building can be done in a month or two. The building of swales just requires an excavator and the subsoiling requires a 6 foot shank plow. The swales should be dug deep, maybe 36 inches deep and 2 feet wide and about 50 feet long. In one acre of land which is 200 feet by 200 feet, this can be done in a few days!

I want to talk about another issue. Many people do not know about this project! I once asked if all the farmers, well owners and landowners had been notified, the answer that I received is that once the plans are completed, then they would be notified! I think that this is too late to tell someone, because they do not get a chance to give their input. A couple of weeks ago, a sub-basin committee chair mentioned the same thing. A person representing the Salinas Basin Water Alliance asked to be included in the Advisory Committee. They voted no. The importance of this is that this group represented one of the largest farming groups in Monterey County. She said that they represented 40,000 farming acres and 38,000 employees and a couple of the company names that I heard are T and A and D Arrigo. It is important they the actual people who will be paying the bills be included in the decision making!!

Let's raise those well water levels!!!

James Sang

Harrison Tregenza <tregenzah@svbgsa.org> Tue, Apr 20, 2021 at 11 35 AM
To: Harrison Tregenza <tregenzah@svbgsa org>
Cc: Emily Gardner <gardnere@svbgsa.org>, Abby Ostovar <aostovar@elmontgomery com>, Ann Camel SVBGSA <camela@svbgsa.org>, Merida Alvarez <alvarezm@svbgsa.org>, Donna Meyers <meyersd@svbgsa.org>, Gary Petersen <peterseng@svbgsa.org>, Les Girard <GirardLJ@co monterey.ca.us>, Marina Pantchenko <PantchenkoMS@co monterey.ca.us>

Good morning Subbasin Committee Members,

I am forwarding you a public comment email received from James Sang.

Thank you, Harrison
[Quoted text hidden]
--
Harrison Tregenza
Administrative Support
Salinas Valley Basin Groundwater Sustainability Agency
tregenzah@svbgsa org
(831) 471-7512 ext. 205
www.svbgsa org

Assigned by RGS, SVBGSA contract administrator

Salinas Basin Water Alliance

SBWA

SALINAS BASIN WATER ALLIANCE

Salinas Basin Water Alliance Board of Directors

George Fontes

David Bunn

Greg Scattini

Gary Tanimura

Tom Bengard

April 21, 2021

Dear Chair Pereira and Eastside Subbasin Committee Members,

As landowners, growers, and agricultural businesses representing more than 41,000 acres throughout the Salinas Valley, we are writing to support the Eastside Groundwater Sustainability Plan's emphasis on closing water data gaps to achieve true sustainability throughout the Salinas Valley.

The Eastside Subbasin Groundwater Sustainability Plan notes a data gap in monitoring groundwater storage. In Section 7.3.2., the GSP acknowledges:

> *A potential data gap is the accuracy and reliability of reported groundwater pumping. SVBGSA will work with MCWRA to evaluate methods currently in place to assure data reliability. Based on the results of that evaluation, the protocols for monitoring may be revised and a protocol for well meter calibration may be developed. In addition, crop data and crop duty multipliers for estimating unreported pumping must be developed in areas where agricultural groundwater pumping is not reported.*

We are writing to encourage this data gap be closed before the GSP is submitted and the agency consider a robust universal reported, not estimated, metering system to do so transparently and equitably.

In addition to potential data gaps in water use reporting, we are also concerned about the lack of data on the impacts neighboring subbasin activity has on the Eastside subbasin. Sections 8.8.2.3, 8.9.2.3, and 8.10.2.3 all acknowledge the need for understanding the impact of the Eastside's sustainable management criteria on other subbasins, implicitly acknowledging what we see every day in practice – actions in one subbasin can affect the sustainability of a neighboring subbasin and vice versa.

Without the GSA's modeling of those impacts, proposed projects or management actions may be ineffective or in fact, reckless. Our alliance is dedicated to protecting groundwater supply for the long-term. That requires honest and transparent data throughout the valley and closing these crucial data gaps is an important step to achieve sustainability in the Eastside Subbasin and the Salinas Valley as a whole.

Sincerely,

George Fontes, President, Salinas Basin Water Alliance

COMMUNITY WATER CENTER
EL CENTRO COMUNITARIO POR EL AGUA

San Jerardo Cooperative, Inc.

April 23, 2021

Salinas Valley Basin Groundwater Sustainability Agency

Submitted electronically to:

Emily Gardner, Deputy General Manager

Donna Meyers, General Manager

Subject Comments on the Draft Salinas Valley GSP Chapters 1-8 for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins

Dear Salinas Valley Basin Groundwater Sustainability Agency:

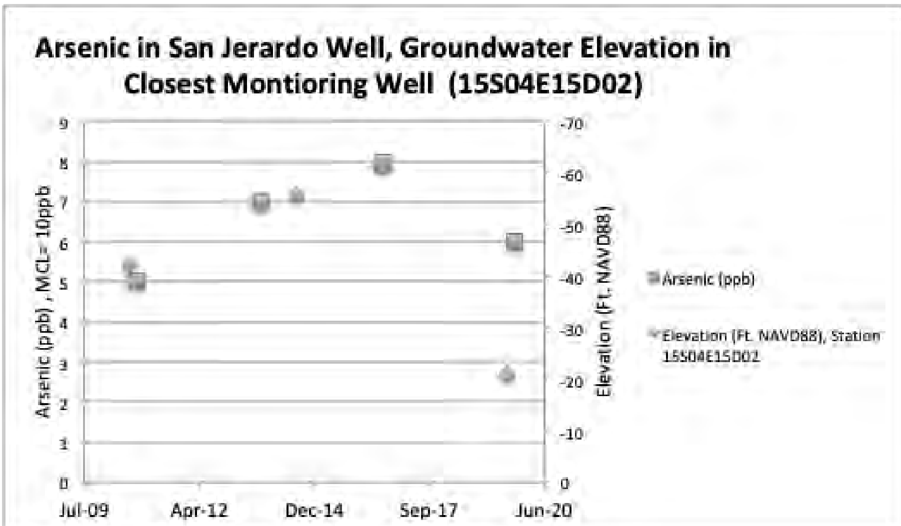
The Community Water Center (CWC) and the San Jerardo Cooperative would like to offer comments and recommendations in response to the draft Groundwater Sustainability Plans (GSPs) Chapter 1-8 for the Langley, East Side, Forebay, and Upper Valley Subbasins as well as Chapters 1-5 and 7 for the Monterey Subbasin that were released in 2020 and early 2021 by the Salinas Valley Basin Groundwater Sustainability Agency (SVB GSA). In addition, we offer preliminary comments on the draft Chapter 9 Implementation Actions that were shared with subbasin committees in April 2020. These comments are intended to add to the public record and are submitted in addition to previous written and spoken comments.

The challenges facing San Jerardo and similar communities throughout all the subbasins in the Salinas Valley are the foundation of our comments in this letter. The San Jerardo Cooperative's well is highly vulnerable to changes in groundwater levels and groundwater quality. Over decades of living and working at San Jerardo Cooperative, Horacio Amezquita has observed firsthand how the irrigation practices on properties surrounding the cooperative impact the water quality in their current and former wells. The San Jerardo Cooperative receives drinking water from a small public water system (CA2701904) and is very concerned that pumping, irrigation practices, and groundwater management in the East Side Subbasin will cause their drinking water well, which currently meets all drinking water standards, to exceed the maximum contaminant levels for arsenic and/or nitrate. Unfortunately, data from the State Water Board indicates increasing levels of nitrate and arsenic in their well with a high arsenic level of 8 ppb on 8/22/2016 that also corresponds to a low groundwater elevation of -61.5 in Station 15S04E15D02, the closest monitoring well to the San Jerardo Cooperative's well (See CWC Figures 1 and 2).[1] While there are too few monitoring data points to draw significant conclusions, CWC Figure 1 does suggest that arsenic levels are higher when groundwater levels are lower. Scientifics studies confirm that contaminants like arsenic, uranium, and chromium (including hexavalent chromium)

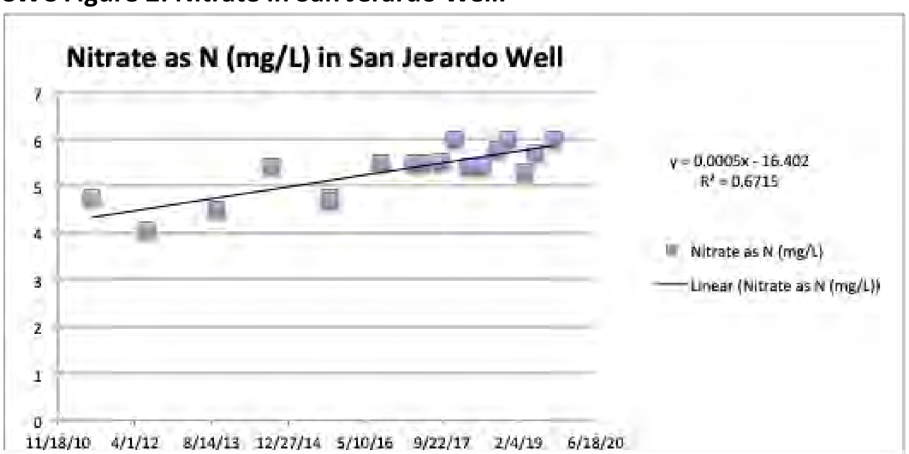
[1] CWC Figure 1 contains all available arsenic data from the State Water Board's Drinking Water Watch online database (https://sdwis.waterboards.ca.gov/PDWW/) which was collected in October 2010, 9/11/13, 8/22/16, and 9/23/19. We then added the monitoring data for Station 15S04E15D02 for the dates most close to the arsenic sampling dates (August 2010, August 2014, August 2016, and August 2019). CWC Figure 2 data was also downloaded from the same online database.

are more likely to be released under certain geochemical conditions influenced by pumping rates, geological materials, and water level fluctuations.[2]

CWC Figure 1: Arsenic in San Jerardo Well, Groundwater Elevation in Closest Monitoring Well
(Note: The groundwater elevation y-axis is reversed to illustrate that lower groundwater elevations are associated with higher arsenic levels.)



CWC Figure 2: Nitrate in San Jerardo Well.



We provide more specific chapter-by-chapter comments in this comment letter. We recommend the GSP should be revised throughout to acknowledge the science showing that groundwater pumping and groundwater level changes can influence water quality.

We strongly recommend that the GSPs incorporate a more robust and representative monitoring network and minimum thresholds to protect vulnerable communities like San Jerardo and those

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[2] Community Water Center and Stanford University, 2019. Factsheet "Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium" for more information.https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

dependent on shallow domestic drinking water wells. This network should include state and local small water systems.

We also firmly agree with the State Water Board's December 8, 2020 comments to the Department of Water Resources on the 180/400 Foot Aquifer GSP, have included them as a reference throughout this comment letter, and recommend that the SVB GSA implement their recommendations in all the other Subbasins GSPs currently in development.[3]

Thank you for reviewing this letter and for the consideration of our comments on the draft GSP chapters. We look forward to working with the SVB GSA to ensure that the GSPs are protective of the drinking water sources of vulnerable, and often underrepresented, groundwater stakeholders. Please do not hesitate to contact us with any questions or concerns. We also look forward to meeting with you in the future to further discuss issues raised in this and past comments.

Sincerely,

Heather Lukacs
Community Water Center

Horacio Amezquita
General Manager, San Jerardo Cooperative, Inc.

Justine Massey
Community Water Center

Mayra Hernandez
Community Water Center

GSP Chapter 3: Description of Plan Area

The description of the plan area can be improved by clarifying the descriptions of the drinking water users in the area. In order to develop a GSP that addresses the needs of all beneficial users, it is critical that the location and groundwater needs of Disadvantaged Communities (DACs) and all drinking water users including domestic well communities are explicitly addressed early on in the GSP. In addition to comments previously submitted to the GSA on July 10, 2020, we recommend the following updates to this chapter:

- **Include a map of all disadvantaged communities (DACs) and their drinking water sources in the subbasin including private wells** as determined both by census data (block groups, census designated places, and census tracts) and median household income surveys conducted in accordance with state and federal agency guidelines. We appreciate that the SVB GSA added "Appendix 11E Disadvantaged Communities" to the 180/400 foot aquifer GSP (Pages 928-941, January 3, 2020) with important information about the location and drinking water challenges, both water quality and seawater intrusion, facing DACs. This information is critical to inform the

[3] DWR SGMA GSP Portal: https://sgma.water.ca.gov/portal/gsp/comments/29.

rest of the GSP. We recommend that it be moved into Chapters 3 and 5 and augmented in the ways described in this section.

- **Correct small error in text in Section 3.2.1 Water Source Types** that incorrectly states that "small state water systems" are included in the Tracking California database. The Tracking California database only includes public water systems serving 15 or more connections.
- **Clarify the number and type of public water systems in the subbasins throughout the entire plan.** In each subbasin plan, there are discrepancies between types and numbers of public water systems in different chapters. For example, the East Side GSP lists the following:
    - Table 3-2 Well Count Summary shows "Public Supply= **24 wells**"
    - Table 5-3 GAMA Water Quality Summary shows "Number of Existing Wells in Monitoring Network Sampled in Water Year 2019" to be **41** for 123-TCP, **46** for Nitrate, and 9 for TDS.
    - Section 7.5 "All the municipal supply wells in the Subbasin are part of the RMS network." A total of **51 public supply** wells were sampled in WY 2019.
    - Table 8-4 Groundwater Quality Minimum Thresholds - **No well count shown**.

  We recognize that different data sources have different limitations and recommend using the best available data consistently throughout the plan.
- **Add a table of all public water systems, their names, locations, number of connections, and number of active wells** in the text or in an appendix that is consistent with the numbers of wells in Table 3-2, Table 5-3, Section 7.5, and other locations where mentioned in the GSPs.
- **Add state and local small water systems to Figure 3-5.** While these systems are currently not in Figure 3-5, their services areas do appear on the SVB GSA GIS portal (svbgsa.maps.arcgis.com) and are labeled as "Parcels served by small water systems (fewer than 15 connections).
- Consider using the same terminology as the Monterey County Department of Health for the state and local small water systems serving 2-14 connections and not using "small public water systems" in Section 3.4.4.2 and throughout the plan. Some definitions of small public water systems include water systems serving up to 199 or even 3300 connections.[4]
- **Revise Section 3.6.3 on the Agricultural Order to indicate that Agricultural Order 4.0 was adopted in April 2021 and include monitoring requirements including on-farm domestic well monitoring of nitrate and 123-trichloropropane, as well as irrigation well monitoring of nitrate.**

GSP Chapter 4: Hydrogeologic Conceptual Model

The hydrogeologic conceptual model is a key component of the basin setting. The basin setting represents the baseline assumptions that the GSA relies on throughout the GSP when choosing minimum thresholds, measurable objectives, and undesirable results, as well as when planning projects and management actions. We recommend that the GSA:

- **Revise Section 4.6 on Water Quality to acknowledge that "natural groundwater quality in the Subbasin" can be influenced by pumping and the way groundwater is managed.**[5] As indicated

[4] California Code, Health and Safety Code - HSC § 116275

[5] Community Water Center and Stanford University, 2019. Factsheet "Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium" for more information.https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

in our cover letter, this is of particular importance for the San Jerardo Cooperative who has experienced increases in nitrate and arsenic in their well.

GSP Chapter 5: Groundwater Conditions

In Chapter 5, we recommend that the GSA make the following changes to all subbasin GSPs (East Side, Langley, Monterey, Upper Valley, and Forebay). The goal is to clearly represent current and past water quality conditions in the subbasin in order to inform the monitoring network sustainable management criteria, planning, management actions, and projects.

Groundwater Quality Distribution and Trends

- **Clearly state in the introduction to Section 5.4 that the amount and location of pumping can impact groundwater quality distribution and trends.** We recommend including this language in the letter submitted by the State Water Board to DWR regarding the 180/400 foot aquifer GSP (Dec. 2020): "Not all water quality impacts to groundwater must be addressed in the GSP, but significant and unreasonable water quality degradation due to groundwater conditions occurring throughout the subbasin, and that were not present prior to January 1, 2015, must be addressed in the GSP's minimum thresholds."[6] High rates of groundwater pumping can pull in contaminant plumes towards drinking water wells, cause the release of arsenic from the strata in the ground, and when shallow wells go dry or are too contaminated to use, new wells must be drilled into deeper portions of the aquifer where they are more likely to encounter high arsenic levels.[7] As previously mentioned, this is of direct concern to the San Jerardo Cooperative who has observed increasing arsenic levels in their relatively new drinking water well, which was drilled to replace a more shallow well contaminated with nitrate and 123-trichloropropane.
- **Include trend data for drinking water wells in the subbasins.** In some places, nitrate and other contaminants are increasing in drinking water wells. It is important to understand current contamination values and also whether well water quality is improving, staying the same or declining as well as the relationship of water quality to other sustainability indicators. As indicated by the data provided in this section, Monterey County maintains an exceptional dataset of water quality data for over 900 state and local small water systems serving 2-14 connections that should be utilized throughout the GSPs. Monterey County has sampled many small water systems for decades. CWC Figures 3 and 4 show nitrate concentrations increasing over time in two state small water systems in the East Side sub basin with high levels in one of the systems (Middlefield Rd. Water System #4) in 2015. Figure 5 illustrates arsenic concentrations in the Metz Road Water System #4 in the Forebay Subbasin. In some cases, data shows fluctuations and peaks in concentrations during the 2015-2016 timeframe. This is similar to the San Jerardo example shared previously. Further, the Central Coast Regional Water Board has analyzed data from their Irrigated Lands Regulatory Program to show that many wells across the region are showing increasing levels of nitrate concentrations.[8]

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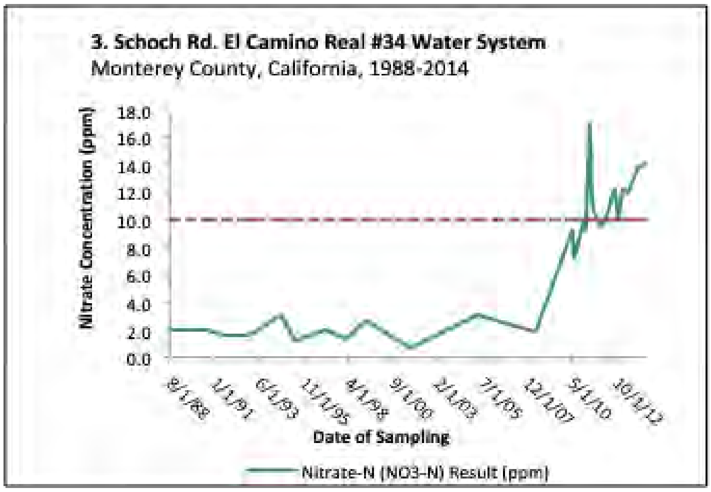
[6] DWR SGMA GSP Portal: https://sgma.water.ca.gov/portal/gsp/comments/29

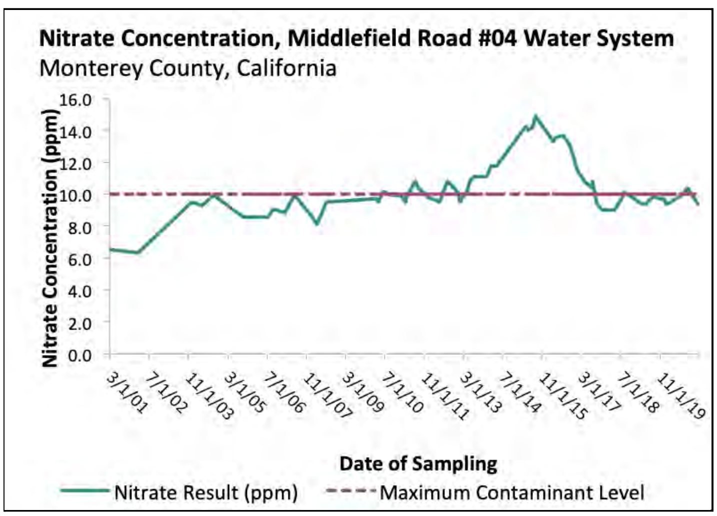
[7] Community Water Center and Stanford University, 2019. Factsheet "Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium" for more information. Available at: https://www.communitywatercenter.org/sgmaresources

[8] Draft Ag Order, Attachment A, 141-143, https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ag_waivers/docs/ag_order4_renewal/2021april/pao4_att_a_clean.pdf.

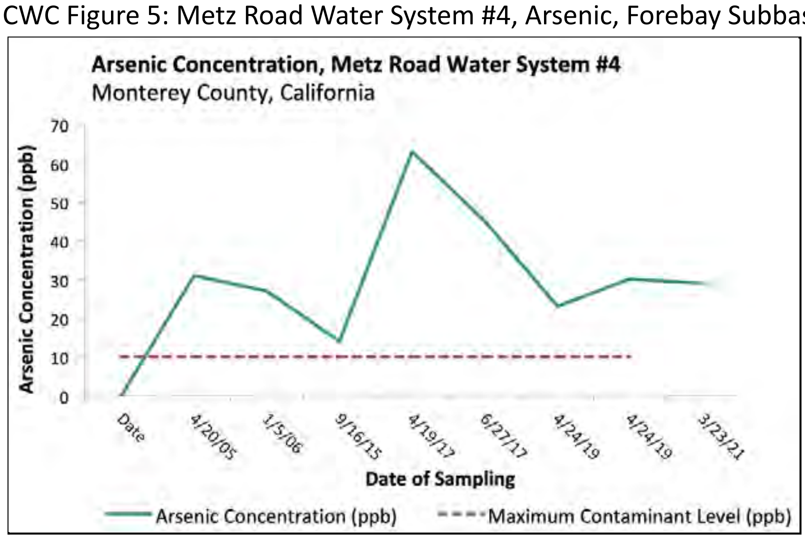
CWC Figure 3: El Camino Real WS #34 - Nitrate as N, East Side Subbasin



CWC Figure 4: Middlefield Road WS #4 - Nitrate as N, East Side Subbasin



CWC Figure 5: Metz Road Water System #4, Arsenic, Forebay Subbasin



- **Revise Section 5.4 to include a specific discussion, supported by maps and charts, of the spatial or temporal water quality trends for all constituents that have been detected in the subbasin and may affect drinking water beneficial users, as required under 23 CCR § 354.16(d).** This section should include water quality data (both in map and tabular form) for all constituents (where available) with primary drinking water standards that have been detected in the subbasin including, but not limited to, **nitrate, 123-trichloropropane, hexavalent chromium,**[9] **arsenic, uranium, and perchlorate for all public drinking water wells, state and local small water system wells, and private domestic wells.** It is especially important for all groundwater stakeholders to be able to understand and visualize the location of contaminant hotspots throughout each subbasin.
    - **Present maps and supporting data for all constituents of concern.** The review of water quality data in the groundwater conditions section of the draft Section 5.4 in the subbasin GSPs is focused primarily on nitrate. The GSPs identify numerous constituents that have been detected in groundwater above drinking water standards, but, with the exception of nitrate, do not present this data spatially. Even though the subbasin GSPs set water quality minimum thresholds for additional constituents (See Tables 8-4 and 8-5), the supporting data is not all presented, and no analyses of spatial or temporal water quality trends are presented. This does not present a clear and transparent assessment of current water quality conditions in the subbasin with respect to drinking water beneficial use (23 CCR § 354.16(d)).
    - **Augment and clarify data presented in Table 5-3 GAMA Water Quality Data Summary and Section 5.4.1 in the following ways:**
        - **Add all state and local small water systems data.** Table 5-3 should include all state and local small water system data for nitrate, arsenic, hexavalent chromium, and any other contaminants that Monterey County monitors in the subbasin.
        - **Include additional contaminants that have been detected in the subbasin(s) to be consistent with Tables 8-5 and 8-6.** Our review of publicly available data on drinking water wells of all types (private domestic wells, state/local small water systems, and public water systems) indicate that there are additional constituents of concern beyond those currently listed. We included CWC Figure 6 (page 9) to highlight the spatial distribution of arsenic in public water system wells in the **East Side, Langley and Monterey Subbasins**, and CWC Figure 7 (page 10) to highlight the spatial distribution of hexavalent chromium in in public water system wells in the **Langley Subbasin**. We recommend a more comprehensive analysis of all other constituents in the subbasins, including, but not limited to the following[10]:

[9] The maximum contaminant level for hexavalent chromium should be reinstated in 2021. Data is available from the State Water Resources Control Board and Monterey County Environmental Health Bureau (public water system data, state/local small water system data) as well as on GAMA from the Central Coast Regional Water Quality Control Board's private well testing program.

[10] All Monterey County data shared in this section was collected by the small water system program.
https://www.co.monterey.ca.us/government/departments-a-h/health/environmental-health/drinking-water-protection/state-and-local
It was downloaded from the Greater Monterey County Community Water Tool on April 22, 2021:
http://www.greatermontereyirwmp.org/documents/disadvantaged-community-plan-for-drinking-water-and-wastewater/

- **East Side Subbasin:** Table 5-3 presents data on two primary contaminants in drinking water: nitrate and 123-trichloropropane, but arsenic is also of particular concern to San Jerardo Cooperative and others in the subbasin. GAMA shows that four public water system wells have exceedances of the arsenic MCL in the past three years (CWC Figure 8), and state/local small water system out of compliance lists from the Monterey County Health Department (2021) show that both Old Stage Rd WS #6 and Old Stage Rd WS #7 are out of compliance for arsenic and that at least five other state or local small water systems have between 6-8 ppb of arsenic, which means they are similar to San Jerardo Cooperative in terms of their vulnerability to water level fluctuations or other changes.
- **Forebay Subbasin:** While arsenic is less common in the Forebay than in the Langley, Monterey, and East Side Subbasins, our review of the Monterey County Health Department data indicates that 17 state or local smalls had arsenic at levels above 1 ppb in the 2015-2017 time period, and at least two of these had levels above the MCL. See CWC Figure 5 (page 8) which illustrates trends in one of the out-of-compliance small water systems, Metz Road Water System #4. In addition, three systems monitored by Monterey County as part of their Local Primacy Program for public water systems serving 15-199 connections had hexavalent chromium detections of 2.8 ppb, 3.4 ppb, and 2.1 ppb in the 2014-2017 timeframe.
- **Upper Valley Subbasin:** Although arsenic is not as common in the Upper Valley as other subbasins, it has been detected in levels between 3.2 and 5 ppb in six small water systems monitored by Monterey County.

■ Clarify what is meant by "DDW wells" in Table 5-3. If these are "public supply wells" in GAMA, please clearly state this.

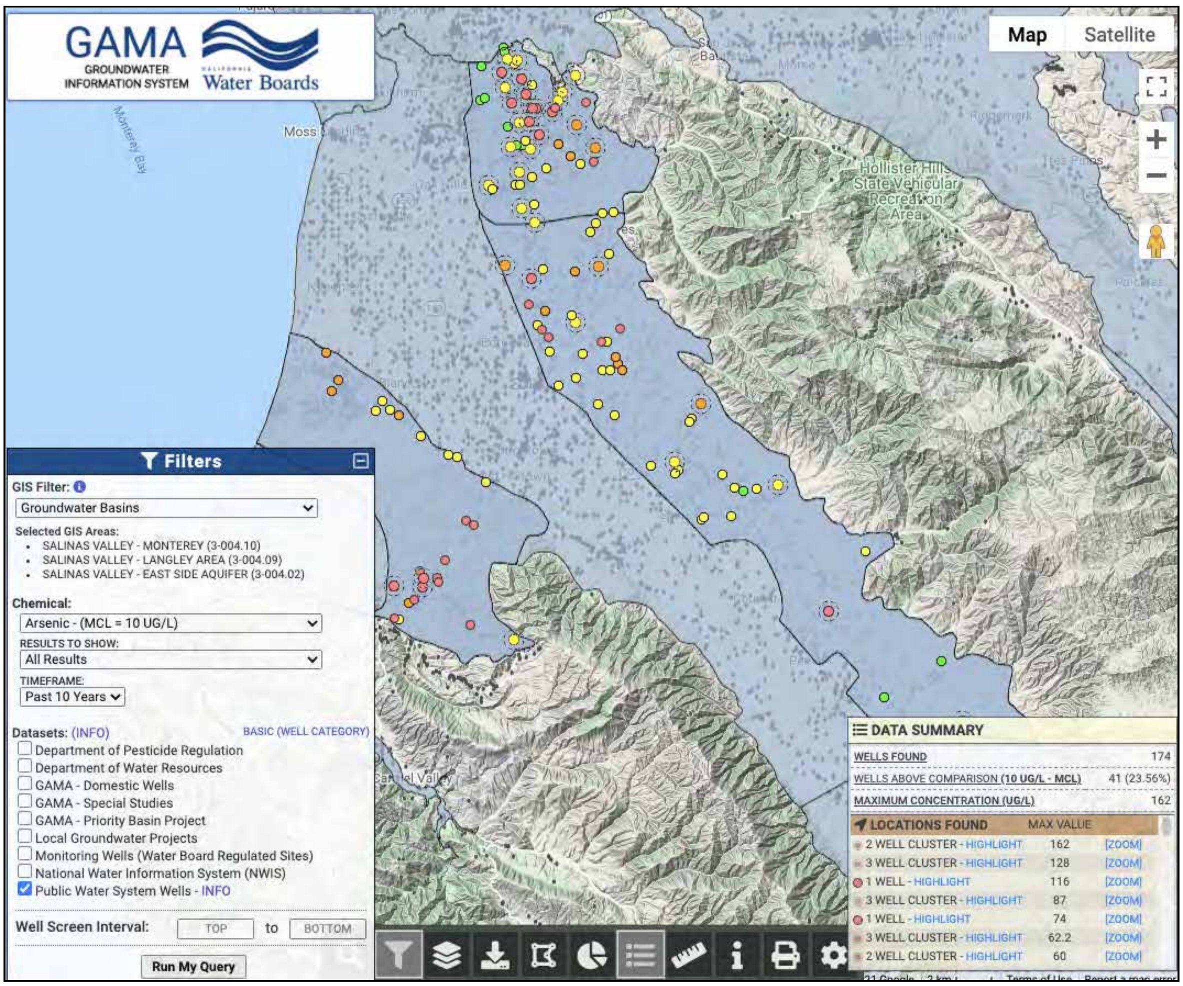
■ **Include the following in Table 5-3: (1) total number of wells of each type, (2) the total number of wells sampled for each constituent, and (3) Of the total number sampled, the number of systems that are out-of-compliance with drinking water standards.** Since public water systems and ILRP wells are monitored on different schedules, there are significant data gaps and inconsistencies when comparing one year to the next in the way that drinking water contaminants are currently represented in GSPs Chapters 5, 7, and 8. For example, we were surprised to see only 15 ILRP Domestic Wells included in Table 5-3 the East Side Subbasin GSP. GAMA shows that there were 139 ILRP wells in the East Side Subbasin sampled for nitrate in the past 3 years, 331 sampled in the last 10 years, and only 8 sampled in the last year. Moreover, CWC Figure 8 illustrates 43 Public Water System Wells in the East Side Subbasin with arsenic data in the past 3 years. On CWC Figure 8, San Jerardo Cooperative's well is shown in orange to indicate that it is at-risk but has not yet exceeded the MCL. However, only 18 Public Water System Wells have sampling data for arsenic from the past year, and during this timeframe, San Jerardo Cooperative's well is not represented (See CWC Figure 9).

■ **Use the compliance status or most recent sample result instead of using the "Number of Wells Exceeding Regulatory Standard in Regulatory Year 2019"**

This is especially important for Table 8-4 and Table 8-5 but also applies to Table 5-3. We recommend the following for different types of drinking water systems:

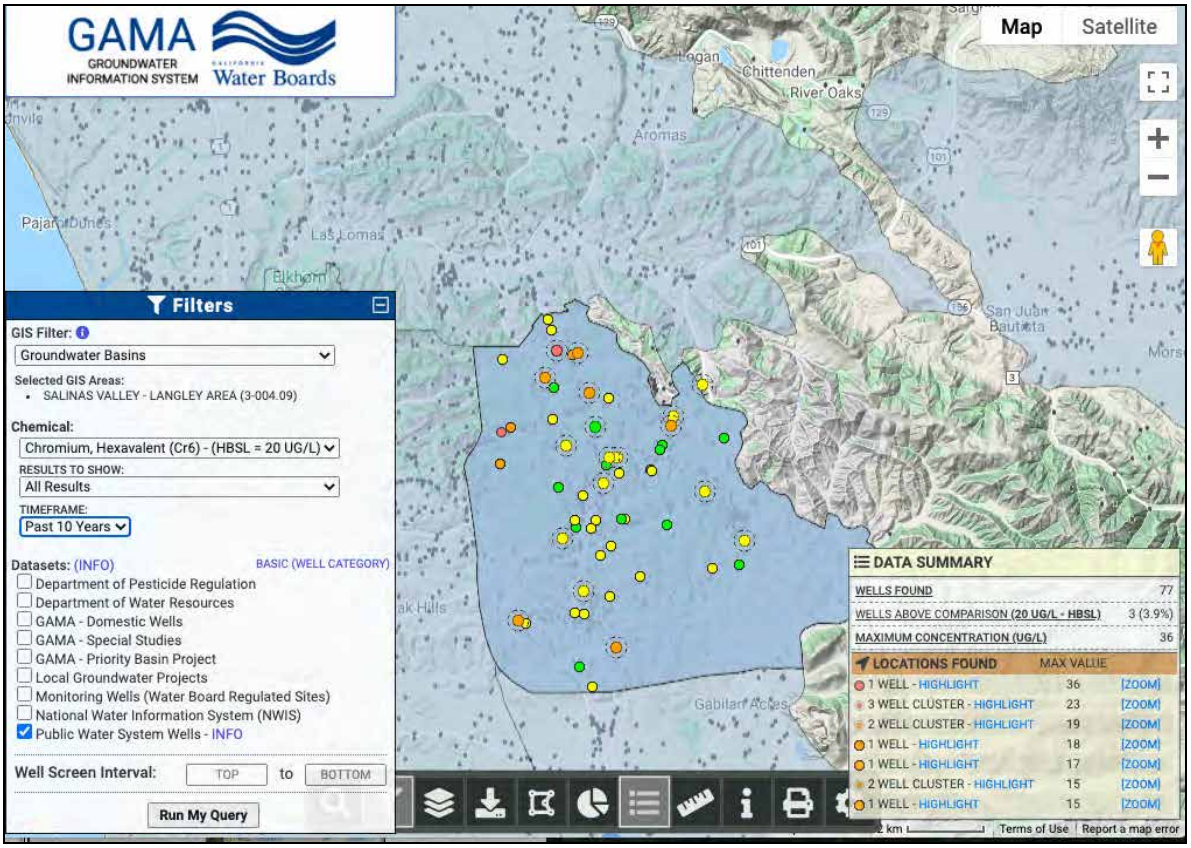
- For public water systems, we recommend using the State Water Board's determination regarding compliance status.
- For state and local small water systems, we recommend using the Monterey County Health Department list of out-of-compliance systems, which is published on their website and available by request on an annual basis based on the most recent sample collected.[11]
- For ILRP wells, we recommend the GSA consider an approach similar to Monterey County and show the most recent sample result for each monitoring well (and not only those sampled in the past year).

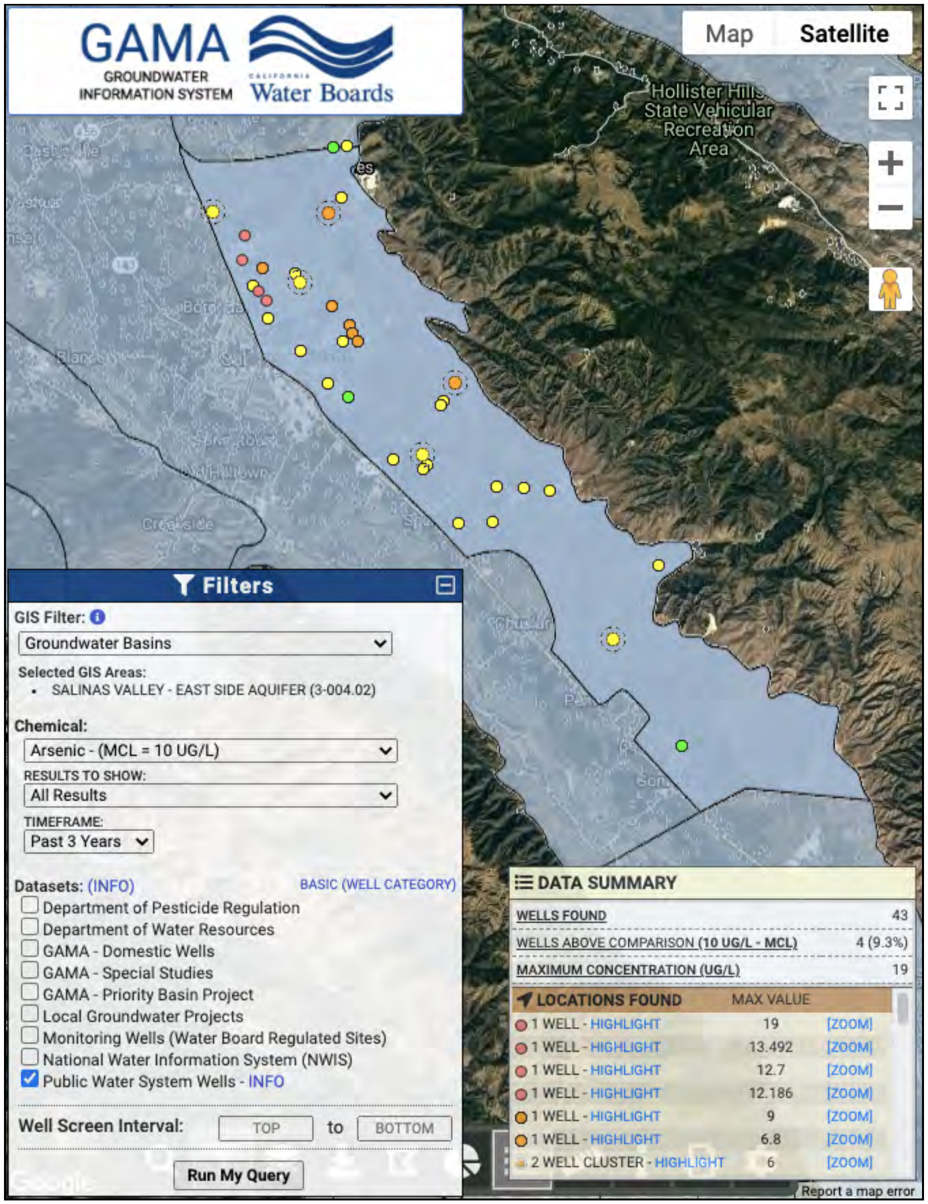
CWC Figure 6: Arsenic Concentrations in Public Water System Wells, Monterey, Langley East Side Subbasins (Red dots = >10 ppb, Orange = 5-9.9 ppb, Yellow = 0.6-5.9 ppb, Green= non-detect)



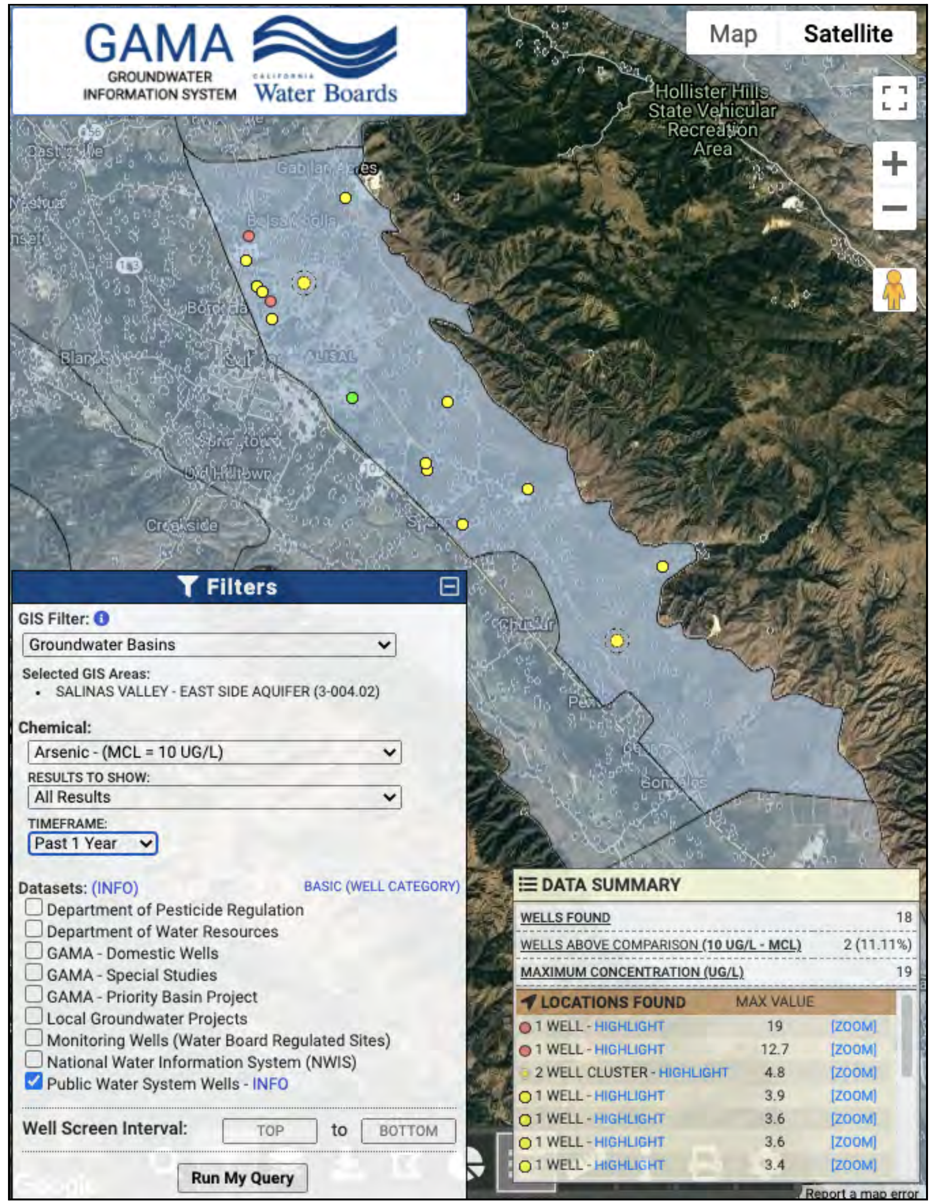
[11] https://www.co.monterey.ca.us/government/departments-a-h/health/environmental-health/drinking-water-protection/state-and-local.

CWC FIgure 7: Hexavalent Chromium Concentrations in Public Water System Wells, Langley Subbasin





CWC Figure 8: 43 Public Water System Wells have arsenic data in the past 3 years. One well at San Jerardo Cooperative appears orange on this map.



CWC Figure 9: Only 18 Public Water Systems Wells have arsenic data in the past year. San Jerardo Cooperative's wells are not shown on this map.

GSP Chapter 6: Water Budgets

SGMA requires a GSP to quantify the water budget in sufficient detail in order to build local understanding of how historic changes have affected the six sustainability indicators in the basin.[12] Ultimately, this information is intended to be used to predict how these same variables may affect or guide future management actions.[13] GSAs must provide adequate water budget information to demonstrate that the GSP adheres to all SGMA and GSP regulation requirements, that the GSA will be able to achieve the sustainability goal within 20 years, and be able to maintain sustainability over the 50 year planning and implementation horizon.[14]

We are concerned that the calculations of sustainable yield and the water budget in this chapter may *overestimate the actual sustainable yield and water availability of the subbasins*. We highlight points of concern below and recommended changes.

6.4 Projected Water Budgets

The SVB GSA Subbasin GSPs explain that "[p]rojected water budgets are extracted from the SVOM, which simulates future hydrologic conditions with assumed climate change. Two projected water budgets are presented, one incorporating estimated 2030 climate change projections and one incorporating estimated 2070 climate change projections. … The climate change projections are based on data provided by DWR (2018)."[15] Including climate change scenarios in water planning is an important step for California's increased resiliency, however, which scenarios to include is a critical question.

Climate change is changing when, where, and how the state receives precipitation.[16] Impacts to water supply, particularly drinking water supply, could be devastating if planning is inadequate or too optimistic. GSAs must adequately incorporate climate change scenarios in water budgets. As such, the DWR Climate Change Guidance[17] makes recommendations to GSAs for how to conduct their climate change analysis while preparing water budgets. DWR also provides climate data for a 2030 Central Tendency scenario and 2070 Central Tendency, 2070 Dry-Extreme Warming (DEW), and 2070 Wet-Moderate Warming (WMW) scenarios. While DWR's Guidance should be improved with more specific guidelines and requirements, the current Guidance specifically encourages GSAs to analyze the more extreme DEW and WMW projections for 2070 to plan for likely events that may have costly outcomes. Therefore, we recommend that the SVB GSA subbasin GSPs:

- **Include water budget analyses based on DWR's 2070 DEW and WMW scenarios in order to analyze the full range of likely scenarios[18] that the region faces.**

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[12] 23 CCR § 354.18.
[13] California Department of Water Resources (DWR), 2016. Best Management Practices for the Sustainable Management of Groundwater, Modeling (BMP #5), December 2016.
[14] 23 CCR § 354.24.
[15] California Department of Water Resources (DWR), 2018. Guidance for Climate Change Data Use During Groundwater Sustainability Plan Development. https://data.cnra.ca.gov/dataset/sgma-climate-change-resources/resource/f824eb68-1751-4f37-9a15-d9edbc854e1f?inner_span=True.
[16] Union of Concerned Scientists. Troubled Waters: Preparing for Climate Threats to California's Water System, 2020. https://www.ucsusa.org/resources/troubled-waters#top.
[17] See DWR (2018) reference above.
[18] Terminology used in the California Climate Change Assessment, 2019. (Table 3). https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf.

- Currently, the SVB GSA's exclusive use of the "central tendency" climate scenario predicts an increase in surface water availability, as represented in the tables in Section 6.4.3 of the subbasin GSPs. The Projected Groundwater Budgets show increases in deep percolation of stream flow, deep percolation of precipitation, and irrigation. The subbasin GSPs are relying on this presumed increase for their water budgets. However, the 2070 DEW scenario provided by DWR could likely result in a significant decrease in precipitation and increase in evapotranspiration, which would have substantial effects on the subbasin water budgets. By analyzing only the central tendency scenario and not other likely scenarios such as the extremely dry and wet scenarios provided by DWR, the SVB GSA is ignoring the specific 2070 DEW and WMW scenarios provided by DWR as well as an increasing trend in drought frequency. In doing so, the GSP could be overestimating groundwater recharge or underestimating water demands, inadequately planning, and jeopardizing groundwater sustainability. This will waste precious time to prepare and reduce the vulnerability of the basin's agriculture and already vulnerable communities.
- DWR's guidance (2018) states that the central tendency scenarios *might* be considered most likely future conditions -- that is not a clear endorsement of a higher statistical probability. It appears that they are calling it the central tendency merely because it falls in the middle of the other two projections, not because it's significantly more probable.
- DWR (2018) explicitly encourages GSAs to plan for more stressful future conditions:
    - "GSAs should understand the uncertainty involved in projecting future conditions. The recommended 2030 and 2070 central tendency scenarios describe what might be considered most likely future conditions; there is an approximately equal likelihood that actual future conditions will be more stressful or less stressful than those described by the recommended scenarios. Therefore, GSAs are encouraged to plan for future conditions that are more stressful than those evaluated in the recommended scenarios by analyzing the 2070 DEW and 2070 WMW scenarios."[19]
- Including the DEW and WMW climate scenarios as part of the 2070 water budget analysis is necessary to meet the statutory requirement to use the "best available information and best available science."[20] Sustainable planning must include planning for foreseeable negative and challenging scenarios. The extreme scenarios provided by DWR are certainly foreseeable, as they have been modeled and made available to the GSA for analysis.
- It is important for the SVB GSA to include the 2070 DEW and WMW scenarios, because shallow drinking water wells in the area are particularly vulnerable to various extreme conditions, especially drought.

[19] California Department of Water Resources (DWR), 2018. Guidance for Climate Change Data Use During Groundwater Sustainability Plan Development. Section 4.7.1. https://data.cnra.ca.gov/dataset/sgma-climate-change-resources/resource/f824eb68-1751-4f37-9a15-d9edbc854e1f?inner_span=True. (In red is a statement about the central tendency scenarios referenced in SVB GSA public meetings and email communications by the GSA's engineering consultant, and in blue is the important text accompanying it, urging GSAs to analyze the more extreme scenarios. CWC staff cited this complete paragraph in email communications with the consultant and GSA staff on April 8, 2021. CWC also raised this point at Forebay and Upper Valley Subbasin Committee meetings in March and at the April SVB GSA Board Meeting.)
[20] See 23 CCR § 355.4(b)(1).

- **Share water budget results based on the 2070 central tendency, DEW and WMW scenarios that DWR has provided with the Subbasin committees, the Advisory Committee, and the GSA board**. This should be done at a *minimum* to see what the difference in outcomes could be, and to provide a transparent process for selecting the preferred scenario. This analysis is particularly important because of the drastic differences between the dry and wet scenarios for this region. Drought and/or intensified rainfall (more water falling over a shorter period of time) would pose severe challenges[21] to the Subbasins' plans for recharge, which is a critical component of their plans to reach sustainability.
- **Plan for potential adverse climate conditions when determining Projects and Management Actions.** The results of limited-scope planning will be detrimental to beneficial users throughout the SVB GSA. "If water planning continues to fail to account for the full range of likely climate impacts, California risks wasted water investments, unmet sustainability goals, and increased water supply shortfalls."[22] This is true not just generally across California, but also specifically on the Central Coast. "Without effective adaptations, projected future extreme droughts will challenge the management of the Central Coast region's already stressed water supplies, including existing local surface storage and groundwater recharge as well as imported surface water supplies from the State Water Project which will become less reliable, and more expensive."[23]

GSP Chapter 7: Monitoring Network

Robust monitoring networks are critical to ensuring that the GSP is on track to meet sustainability goals. GSAs undertaking recharge, significant changes in pumping volume or location, conjunctive management or other forms of active management as part of GSP implementation must consider the interests of all beneficial users, including domestic well owners and S/DACs. We have the following overarching recommendations for this chapter and provide more details for sub-sections below:

- **Require well registration and metering for all wells in the Salinas Valley, and begin implementation of a well registration and metering program in early 2022 with a dedicated budget.** We voice our strong support, with modifications indicated in our comments below, for proposed "Implementation Action 12: Well Registration" in Section 9.1 of Chapter 9 released in April 2021 and recommend that this action be updated and moved to Chapter 7. We agree with the SVB GSA's statement in Section 7.3.2 Groundwater Storage Monitoring Data Gaps that: "Accurate assessment of the amount of pumping requires an accurate count of the number of municipal, agricultural, and domestic wells in the GSP area. During implementation, the SVB GSA will finalize a database of existing and active groundwater wells in the Eastside Aquifer Subbasin." This is essential for the plan to achieve sustainability for all beneficial users and influences many different chapters including:

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[21] Union of Concerned Scientists. Inter-model agreement on projected shifts in California hydroclimate characteristics critical to water management. 2020, p. 13. https://link.springer.com/content/pdf/10.1007/s10584-020-02882-4.pdf.

[22] See Union of Concerned Scientists. Troubled Waters (2020) cited above.

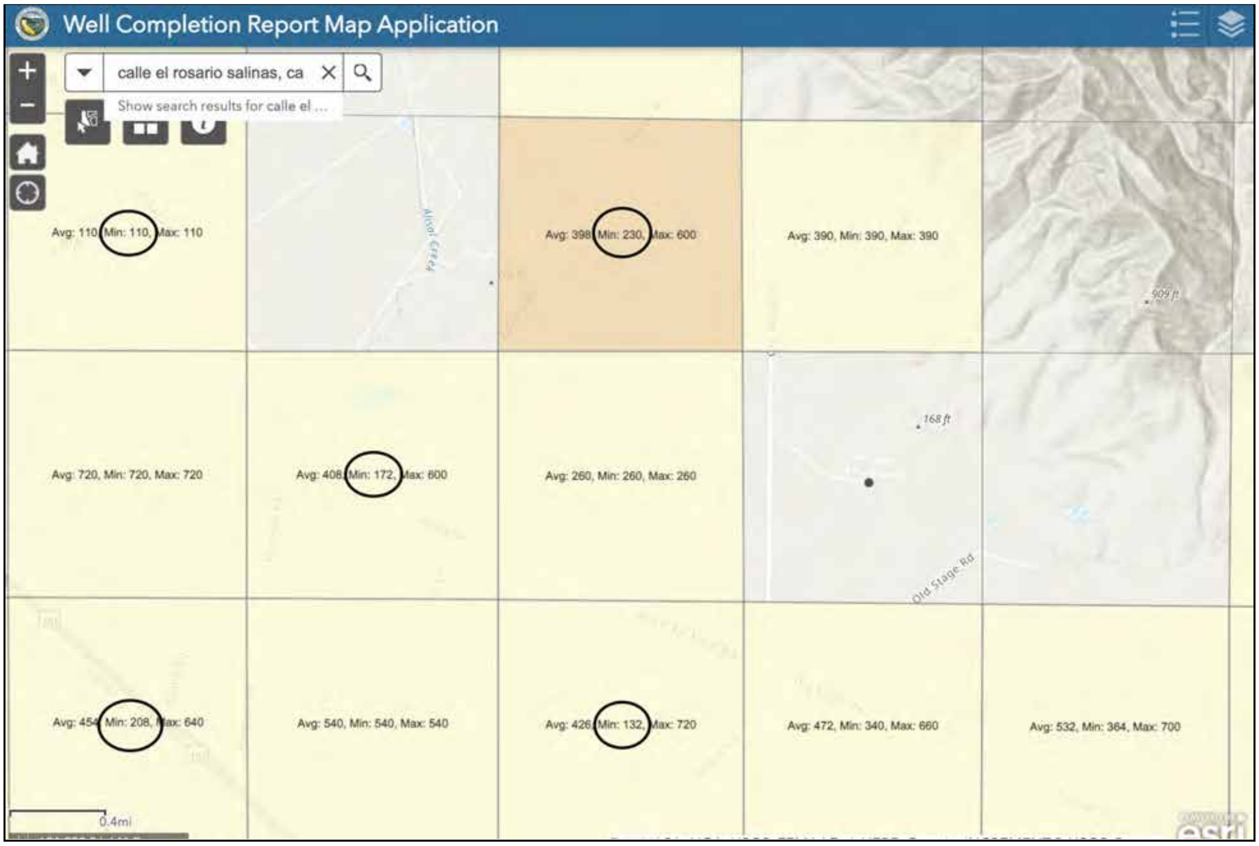
[23] Regional Climate Change Assessment for the Central Coast, 2019. (Discussing drought pp. 21-23. Internal citations omitted). https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-006_CentralCoast_ADA.pdf.

    - Monitoring networks: In order to develop a monitoring network that is representative, it will be essential to understand the number, location, well construction, and type (domestic, irrigation, other) of all wells located in the subbasins.
    - Water budget and minimum thresholds: Understanding the amount and location of pumping of all water users will be essential for creating an accurate water budget and minimum thresholds consistent with achieving sustainability.
    - Projects and management actions: Section 9.2.1 Well Registration and Metering is a key management action and component of the Water Charges Framework (in the 180/400 foot aquifer) and forthcoming subbasin GSPs. This will underpin the funding structure for many future projects.
- **Require flowmeter calibration to ensure consistent and fair monitoring among all agricultural groundwater users (Section 7.3.1).** Rather than "consider the value of developing protocols for flowmeter calibration," the GSPs should require flowmeter calibration. The water budget and sustainable yield calculation depend on reliable and fair monitoring and reporting of pumping.
- **Provide a plan and schedule for data gap resolution in forthcoming Chapter 10 of the subbasin GSPs.** In the 180/400 foot aquifer GSP, there was not a clear plan or schedule for the resolution of data gaps in Chapter 7 even though it indicated that this would be included in Chapter 10.
- **Revise GSP monitoring chapters such that monitoring networks for groundwater storage (pumping), groundwater elevation, and groundwater quality adequately monitor how groundwater management actions could impact vulnerable communities including those reliant on domestic wells and shallow portions of the aquifers** (see more detail below).

7.2 Groundwater Elevation Monitoring Network

- **Include groundwater elevation monitoring sites in the network that are representative in terms of the depth and geographic distribution of private domestic wells, and that takes into account areas of high agricultural pumping and wells vulnerable to groundwater decline.**
    - The draft East Side Subbasin GSP Table 7-1 of "Eastside Aquifer Groundwater Elevation Representative Monitoring Site Network" shows all irrigation and observation wells (and no domestic wells) which range in depth from 299 to 1122 feet.[24] Yet, the DWR Well Completion Report Map Application[25] shows that 1 mile by 1 mile square sections near San Jerardo Cooperative include private domestic wells with the following minimum depths: 110 ft, 210 ft, 172 ft, 208 ft, and 132 ft which are more shallow than all the wells in the current monitoring network (See CWC Figure 10).
- **Overlay the private well density map (Figure 3-7), the DWR Well Completion Report Map Application (with minimum, average, and maximum depths), the water level monitoring network (with well depths), and available pumping data to better illustrate if and how representative the proposed groundwater elevation monitoring network is of private domestic wells and which areas are vulnerable to water elevation changes.** The GSPs state: "The BMP notes that professional judgment should be used to design the monitoring network to account for high-pumping areas, proposed projects, and other subbasin-specific factors. " This will also help to better visualize where there are gaps in the monitoring network which the GSAs can address.

[24] One well shows "0" depth but that must be an error or missing value.
[25] https://water.ca.gov/Programs/Groundwater-Management/Wells/Well-Completion-Reports



CWC Figure 10: Screenshot of DWR Well Completion Report Map application in the area near San Jerardo Cooperative highlighting that several 1 mi. by 1 mi. square sections include private domestic wells less than 250 feet deep.

7.5 Water Quality Monitoring Network

- **Clarify the number of public water system wells that will be included in the water quality monitoring network.** We strongly support the GSPs inclusion stated in Section 7.5 that "All the municipal supply wells in the Subasin are part of the RMS network." As indicated in Chapter 3 and Chapter 5 comments, the GSPs should also clearly identify the number of public supply wells as well as the number of public supply wells that are out of compliance and at risk in each subbasin. Section 7.5 currently states that “A total of 51 public supply wells were sampled in WY 2019” and indicates that all wells are listed in Appendix 7E (which is not publicly available at this time). This section and appendix should be consistent with the total number of wells represented in Table 8-4 which includes groundwater quality minimum thresholds.
- **Representative Water Quality Monitoring Wells for the shallow aquifer should be established in the GSPs based on all currently available data sources with direct agreements with landowners or public entities established.**
    - **Develop long-term access agreements for Representative Monitoring Wells (RMWs) that use private wells.** Collecting data from private wells is not a reliable approach due to access challenges, lack of well construction information, and unreliable accounting of

pumping or non-pumping measurements. The GSPs should specifically identify the RMW owners and operators, include signed long-term access agreements, and identify a plan to obtain adequate monitoring data, if for any reason the well owners decide to not grant access to the wells or provide associated data to the SVB GSA. In order to maintain consistency for future sustainability analyses, the SVB GSA should also consider conducting its own water quality analysis of wells where access agreements have already been established to water quality RMWs.

- **Clarify that state and local small water systems will be added to the water quality monitoring network and that well construction information is no longer needed in order to fill this data gap.** Monterey County Environmental Health Bureau permits and monitors over 900 state and local small water systems in the County and have managed the data collected for decades. This dataset has advantages over the ILRP domestic well dataset in that it includes data on contaminants like arsenic and hexavalent chromium in addition to nitrate. Local small water systems serve 2-4 households and are much more similar to private domestic wells than public water systems in terms of depth, well construction, age, size, and maintenance - thus this data would provide a broader representation of shallow drinking water wells. State and local small water systems are located in areas of irrigated agricultural lands as well as rural residential and other land uses. This dataset should complement and not replace ILRP domestic well data.
  - **Clearly add state and local small water system data as a data gap in Section 7.5.2.** In Section 7.5 Water Quality Monitoring Network, the draft GSPs state: “These [state and local small] wells are not in the current monitoring system because well location coordinates and construction information are currently missing. SVB GSA will work with the County to fill this data gap. When location and well construction data become available, these wells will be added to the monitoring network and included in Appendix 7E and Figure 7-4." However Section 7.5.2 Groundwater Quality Monitoring Data Gaps states: "There is adequate spatial coverage to assess impacts to beneficial uses and users."
- **Do not rely solely on ILRP well data to represent private domestic wells (which are often more shallow than public water system wells).** Similar to CASGEM, the current groundwater quality monitoring network includes monitoring points on private property including ILRP domestic and irrigation wells, but it should not be restricted to ILRP sites only. While on-farm domestic and irrigation wells monitored through the ILRP provide a potentially useful, though limited, source of water quality information, additional representative monitoring wells in the shallow aquifer are important to include for several reasons: (1) The ILRP network only includes wells located on agricultural irrigated lands, and not all ILRP properties include domestic wells. Agricultural land use is not the primary land use in the Langley and Monterey Subbasins so this monitoring network offers very limited coverage. While agricultural land use is the primary land use in the East Side, Upper Valley, and Forebay Subbasins, there are private domestic wells in areas with different primary land uses (e.g. rural), and SGMA requires that monitoring networks are geographically representative. Monitoring network wells must also be sufficiently representative to cover all uses and users in the basin, (2) There are other, more robust networks established by USGS, GAMA, and Monterey County that could be drawn on and included to make the groundwater quality monitoring network more comprehensive and representative of conditions in the shallow aquifer, (3) Ag Order 4.0 was adopted on April 15, 2021, which means the first year of monitoring data will not be

available until late 2022, (4) The GSA has no authority to determine the robustness or enforcement of monitoring in the irrigated lands network, and (5) while Ag Order 4.0 proposes to require testing for 1,2,3-TCP as well as nitrate, the current ILRP domestic well data only samples for nitrate, and neither Order tests for other contaminants found in the region. In our experience, not all growers are consistent with their water quality and other reporting, despite the regulatory requirements in place.

- **Update Domestic ILRP and Irrigation ILRP wells in a different color on Figure 7-5 Locations of ILRP Wells Monitored under Ag Order 3.0.** Since these wells are monitored for different constituents and serve different beneficial users, it is important to illustrate them separately.

GSP Chapter 8: Sustainable Management Criteria

We have grouped our comments in this section into general recommendations related to all sustainable management criteria (SMCs) followed by a section specific to the water quality SMCs. We recommend that the Salinas Valley GSA implement the following recommendations in the subbasin GSPs:

- **Undertake a drinking water well impact analysis that adequately quantifies and captures well impacts at the minimum thresholds, proposed undesirable results, and potential interim conditions.** Include this analysis during the annual reporting process. We disagree with the assumption included in all draft GSPs that the exact location of wells needs to be known in order to include them in a drinking water well impact analysis. In the 180/400 Foot Aquifer Subbasin GSP, the SVB GSA included a domestic well impact analysis. Although the SVB GSA did not describe the methods used in this analysis,[26] it is CWC's understanding that the analysis was based on Public Land Survey System (PLSS) section location data, demonstrating that such an analysis is feasible. Similar analyses in the Water Foundation Whitepaper (June 2020)[27] and in the Kings River East GSP[28] were completed using the same PLSS section location data for private domestic wells that is available to the SVB GSA. The current analysis is incomplete as it includes very few wells in all subbasins. The current analysis is also substantially inaccurate as it relies on the "average computed depth of domestic wells in the Subbasin," and groundwater elevations vary significantly across the subbasin and also on an annual basis. For example, only 8 of the 154 domestic wells in the Forebay GSP with an average depth of 292.45 feet, and only 20 of 2016 domestic wells in the East Side GSP with an average depth of 365.5 feet were included. CWC Figure 10 illustrates that the average computive depth is not representative of conditions in shallow domestic wells. Therefore, we recommend revising Section 8.5.2.2 Minimum Threshold Impact on Domestic wells following the process explained below:
    - **Include a map of potentially impacted wells so the public can better assess well impacts specific to DACs, small water systems, or other beneficial users of water.**

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[26] Community Water Center and San Jerardo Cooperative, Inc. Comments on the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan. May 15, 2020. https://sgma.water.ca.gov/portal/service/gspdocument/download/4012

[27] The Water Foundation Whitepaper, April 2020: "Estimated Numbers of Californians Reliant on Domestic Wells Impacted as a Result of the Sustainability Criteria Defined in Selected San Joaquin Valley Groundwater Sustainability Plans and Associated Costs to Mitigate Those Impacts." April 9, 2020. http://waterfdn.org/wp-content/uploads/2020/05/Domestic-Well-Impacts_White-Paper_2020-04-09.pdf

[28] Kings River East Groundwater Sustainability Agency. Groundwater Sustainability Plan. Adopted December 13, 2019.

- **Quantify impacts for all drinking water wells in the subbasin for which approximate location (PLSS section) and well depth are available.** Similar analyses based on the PLSS section location of private domestic wells have been completed by Water Foundation (June 2020)[29] and in the Kings River East GSP[30].
- **Account for well screen and pump depth when available.** When not available, well screen and pump depth should be estimated conservatively to capture potential impacts to well operability under water scarcity conditions.
- **Quantify impacts for potential unfavorable interim conditions, such as droughts and short-term lowering of groundwater levels while implementation measures are put in effect.**
- **Quantify the elevation difference (in feet) between current groundwater levels and well bottoms, screens, and pumps.** If current groundwater levels are nearing well bottoms, screens or pumps, that indicates that the wells are vulnerable to interim lowering of groundwater levels.
- **Quantify the elevation difference (in feet) between the minimum threshold groundwater levels and well bottoms, screens, and pumps.** If the minimum threshold is near the well bottom, screen or pump, that well will be impacted if groundwater levels in the vicinity drop below the minimum threshold (even if minimum thresholds are met at 90 percent of monitoring wells and an undesirable result has not technically occurred).
- **Quantify the number of potentially impacted wells of each well type (irrigation, domestic, state/local small water system, public water system) for water quality, water levels, and sea water intrusion MTs.**
- **Quantify the costs associated with impacted wells including desalinization/treatment, lowering pumps, well replacement and increased pumping costs associated with the increased lift at the projected water levels.**

Groundwater Quality

We are pleased that the Salinas Valley Subbasin GSPs establish minimum thresholds based on maximum contaminant levels (MCLs) for contaminants of concern for drinking water supply systems. There are however other areas in regards to groundwater quality sustainable management criteria that are not clear and could cause significant impacts to drinking water users if not adequately addressed. Therefore, we recommend the following revisions:

- **Revise Section 8.3 General Process for Establishing Sustainable Management Criteria to include a sensitivity analysis around "average hydrogeologic conditions" following our recommendations outlined in Chapter 6.**
- **Add state and local small water systems to the monitoring network with the same water quality minimum thresholds and measurable objectives for reasons stated in Chapter 7 comments.** A table for state and local small water system minimum thresholds was included in the 180/400 foot aquifer GSP, but in the draft subbasin GSPs, there is no such table and Table 8-1 only mentions public supply and on-farm domestic wells.

[29] See previous reference.
[30] See previous reference.

- **If a contaminant was already above the MCL as of January 1, 2015, subbasin GSPs should set a MT to prevent further degradation or aim to improve groundwater quality conditions where possible.** Increased contamination levels can require water systems to utilize more expensive treatment methods and/or to purchase additional alternative supplies as blending may become more difficult or impossible. Communities reliant on domestic wells who are aware of contamination in their water and use point of use/point of entry (POU/POE) treatment systems may no longer be able to use their devices if contaminate levels rise too high. Higher contaminant levels can also result in higher costs of waste disposal from certain types of treatment systems. Further, residents who rely upon domestic wells, state small water systems, or local small water systems may not even know what contaminants are in their water and at what levels. Users of these drinking water sources are not required to conduct testing, and many times do not have the resources necessary to conduct regular testing. Rising contaminant levels put these users and their health at serious risk. Increased contamination levels result in unreasonable impacts to access to safe and affordable water and are, thus, inconsistent with SGMA and the Human Right to Water. This recommendation is consistent with the State Water Board's recommendations regarding this topic in their letter to DWR regarding the 180/400 foot aquifer GSP in which they state: "Increasing concentrations of nitrate, arsenic, and other constituents at monitoring wells with existing exceedances may represent worsening of existing conditions due to groundwater pumping. Staff recommend setting concentration threshold levels for these wells in order to determine if impacts due to pumping are occurring."[31]
    - **Develop management areas to protect areas where drinking water wells have water quality that are vulnerable, including the San Jerardo area.**
- **For monitoring network wells with contamination less than 75% of the MCL for all contaminants, the GSPs should set MOs at 75% of the MCLs.** Subbasin GSPs should include MOs as action triggers at 75% of MCL for each constituent of concern so that groundwater can be managed in that area to prevent a minimum threshold exceedance at a representative monitoring well. This buffer is particularly critical with contaminants like nitrate that can cause acute health effects. If the GSA waits until the minimum threshold is exceeded, it may be too late or difficult for actions to be effective. Actions to prevent minimum threshold exceedances should also be clearly explained in this Chapter including a description of what action will be taken, what type of evaluation will be used, under what time period action will take place, and how this action will be funded. *We also recommend that groundwater quality and trigger levels at 75% are added to Section 9.1.3 Implementation Action 11: Local Groundwater Elevation Trigger (April 2021 draft) which currently only includes groundwater elevations.*
- **Clearly identify and describe past and present levels of contamination and salinity at each representative monitoring well (RMW) and attribute specific numeric values for MTs/MOs at each RMW for each contaminant of concern.** Quantitative values need to be established for MTs/MOs for each applicable sustainability indicator at each RMW as required by 23 CCR § 354.28 and 23 CCR § 354.30. The GSPs should include a map and tables that include each individual RMW along with water quality data for each RMW (this data is currently summarized in Table 8-4 and Table 8-5). This information should be presented clearly so that both the public can determine how the proposed monitoring network and sustainable management criteria (SMCs) relate to their own drinking water well or water supply system.

[31] State Water Board comments to DWR on 180/400 Foot Aquifer GSP (Dec. 2020). Downloaded from SGMA GSP Portal: https://sgma.water.ca.gov/portal/gsp/comments/29

- **Include hexavalent chromium as a contaminant of concern and plan to add contaminants of emerging concern to the monitoring network.** While there is currently not a Maximum Contaminant Level for hexavalent chromium, there is still a Public Health Goal and public health threat posed by this contaminant in drinking water. The State is required to adopt an MCL for chromium-6 again and is in the process of updating the MCL. In addition to including hexavalent chromium, the GSPs must explain how the Plans will be updated to align groundwater monitoring efforts and the sustainable management criteria with any contaminants of emerging concern in the basin and any future new MCLs.
- **Include an analysis of the relationship between changes in groundwater levels and groundwater quality concentrations.** Section 8.5.2.3 of the draft GSPs discusses the relationship between individual minimum thresholds and other sustainability indicators, and states: "Decreasing groundwater elevations can cause wells to draw poor-quality groundwater from deeper zone. No additional poor groundwater quality issues were identified due to low groundwater elevations when groundwater elevations were previously at minimum threshold levels." We ask that justification is provided to backup the second statement or that it is removed until an analysis is conducted. It is our understanding that groundwater quality issues did, in fact, worsen during low groundwater elevations years. Arsenic in the San Jerardo well was at its highest during the lowest groundwater elevation measurement (See CWC Figure 1). The text should acknowledge that groundwater pumping can not only cause the movement of contaminant plumes, but can also cause the release of naturally occurring contaminants such as arsenic and chromium. In order to clearly evaluate the relationship between changes in groundwater levels and groundwater quality, SVB GSA should undertake an analysis of the change in water quality constituent concentrations relative to change in water levels,[32] particularly over drought periods, to evaluate the potential relationship between water quality and groundwater management activities.[33]
- **Add the total number of wells in each category that will be included in the water quality monitoring network and have SMCs evaluated to Table 8-4. For each constituent of concern, add the number of wells included in the chart and the number exceeding the MT/MO based on the latest sample.** This comment has the same goal as the comment we provided in Chapter 7. SMCs should be set at every public drinking water well and a representative network of drinking water wells that rely on more shallow aquifers. It is essential to track the same wells each year in the monitoring network. If a well is no longer active, it should be removed from the network. In the current representation, it is not clear which wells are included in the monitoring

[32] See P.A.M. Bachand et. al. Technical Report: Modeling Nitrate Leaching Risk from Specialty Crop Fields During On-Farm Managed Floodwater Recharge in the Kings Groundwater Basin and the Potential for its Management https://suscon.org/wp-content/uploads/2018/10/Nitrate_Report_FInal.pdf. See also, Groundwater Recharge Assessment Tool, created by Sustainable Conservation to help groundwater managers make smart decisions in recharging overdrafted basins, including modeling whether a particular recharge project would result in short or long term benefits or harms to water quality, http://www.groundwaterrecharge.org/.

[33] More information about groundwater quality and the relationship between changes in groundwater levels can be found in the following resources:

Stanford, 2019. A Guide to Water Quality Requirements Under the Sustainable Groundwater Management Act. Community Water Center, 2019. Guide to Protecting Drinking Water Quality Under the Sustainable Groundwater Management Act. https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1559328858/Guide_to_Protecting_Drinking_Water_Quality_Under_the_Sustainable_Groundwater_Management_Act.pdf?1559328858

Community Water Center and Stanford University, 2019. Factsheet "Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium" for more information.https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

network, which wells have data for each constituent, and which wells are exceeding the regulatory standard.

- **Engage stakeholders and scientists in a transparent discussion regarding "the process the GSAs would use to decide whether or not an exceedance of an MT for water quality degradation was caused by GSP implementation."**[34] The State Water Board recommended that the 180/400 foot aquifer GSP outline this process "otherwise, it is difficult to judge how adequately the GSP addresses undesirable results related to water quality degradation." This relates to the undesirable result for water quality which currently reads: "There shall be no additional minimum threshold exceedances beyond existing groundwater quality conditions during any one year as a direct result of projects or management actions taken as part of GSP implementation."

[34] State Water Board comments to DWR on 180/400 Foot Aquifer GSP (Dec. 2020). Downloaded from SGMA GSP Portal: https://sgma.water.ca.gov/portal/gsp/comments/29 .

COMMUNITY WATER CENTER
EL CENTRO COMUNITARIO POR EL AGUA

April 28, 2021

Salinas Valley Basin Groundwater Sustainability Agency

Submitted electronically to:

Emily Gardner, Deputy General Manager

Donna Meyers, General Manager

Re: Comments on Draft Chapter 9 Project and Management Actions for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins

Dear Salinas Valley Basin Groundwater Sustainability Agency:

The Community Water Center (CWC) offers the following comments and recommendations regarding key components of the draft Chapter 9 Projects and Management Actions (Implementation Actions) that were shared with SVB GSA subbasin committees in April 2020. These comments are intended to add to the public record and are submitted in addition to previous written and spoken comments.

Chapter 9 Projects and Management Actions

During the April 7, 2021 East Side and Upper Valley subbasin committee meetings, feedback was requested on a draft list of project and management actions. As outlined in the April 7 meeting materials, "[p]rojects implement the GSP and enable the subbasin to reach sustainability by 2042, then maintain sustainability for another 30 years." Both groundwater levels and water quality degradation can have adverse impacts on drinking water users and disadvantaged communities (DACs), who are protected as beneficial users under SGMA[1]. Therefore, projects and management actions (also referred to as implementation actions) should address sustainability issues facing drinking water and other domestic water uses, in order to ensure their continued availability.

As this chapter is further revised for the East Side and Upper Valley subbasins and as potential projects and management actions are considered for the Forebay, Langley, and Monterey, the GSPs should (1) clearly identify potential impacts to water quality from all projects and management actions, (2) include management actions that respond to immediate needs and (3) develop a more robust implementation schedule and funding plan for projects and management actions. We acknowledge that the implementation actions are currently in the beginning stages of design but encourage incorporating these elements early on.

9.1.3 Implementation Action: Local Groundwater Elevation Trigger

The Local Groundwater Elevation Trigger is a significant start to tracking and addressing impacts to domestic wells. We support the inclusion of a "notification system whereby well owners can notify the GSA or relevant partner agency if their well goes dry." Because SVB GSA defines its sustainability criteria in a way that potentially allows for drinking water well impacts and because there is so much uncertainty regarding potential domestic well impacts, we recommend that this implementation action be updated to incorporate a **Robust Drinking Water Well Mitigation Program.** This program should include the Local Groundwater Elevation Trigger as well as (1) a plan to prevent impacts to drinking water users from

[1] WAT § **10723.2.**

dewatering, increases in contaminant levels and increases in salinity, and (2) a plan to mitigate the drinking water impacts that occur even when precautions are taken.

CWC together with other organizations published a Framework for a Drinking Water Well Mitigation Program (2020) that we recommend the SVB GSA uses as a guide when further developing this implementation action. We are also interested in sharing more with staff and are willing to provide a presentation to SVB GSA staff, board members, and/or the advisory committee on this Framework. The framework describes the importance of adaptive management and affirms the intent of the draft Local Groundwater Elevation Trigger management action and states, "Developing a protective warning system... can alert groundwater managers when groundwater levels and groundwater quality are dropping to a level that could potentially negatively affect drinking water users. These "triggers" are essential for groundwater management and can be adjusted to fit the needs of different management actions as well as the basin as a whole."[2] We also support the provision in the draft "Local Groundwater Elevation Trigger" Implementation Action that offers "referral to assistance with short-term supply solutions, technical assistance to assess why it went dry, and/or long-term supply solutions." This type of adaptive management implementation action is crucial to ensuring that all beneficial users within the basin are protected under the GSP. As we have highlighted in previous comments[3]:

> A GSP that lacks a mitigation program to curtail the effects of projects and management actions as to the safety, quality, affordability, or availability of domestic water, violates both SGMA itself and the Human Right to Water (HR2W).[4] The California legislature has recognized that water used for domestic purposes has priority over all other uses since 1913[5] in Water Code § 106, which declares it, "established policy of this State that the use of water for domestic purposes is the highest use of water and that the next highest use is for irrigation."[6] The passage of the Safe and Affordable Drinking Water Fund by Governor Newsom indicates a clear State-level commitment to provide safe and affordable drinking water to California's most vulnerable residents.[7] To ensure compliance with the Legislature's long established position, the HR2W requires that agencies, including the Department of Water Resources and the State Water Board, must consider the effects on domestic water users when reviewing and approving GSPs.[8] Therefore, GSPs that cause disparate impacts to domestic water use are in violation of the HR2W, SGMA, and Water Code § 106.6.

In order to effectively protect drinking water users during GSP implementation, we recommend that the GSA's **Drinking Water Well Impact Mitigation Program Implementation Action,** in line with and expanding upon the currently proposed Local Groundwater Elevation Trigger, should include the following components:

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[2] *See* Self-Help Enterprises, Leadership Counsel for Justice and Accountability, Community Water Center (2020) *Framework for a Drinking Water Well Impact Mitigation Program*.
https://static1.squarespace.com/static/5e83c5f78f0db40cb837cfb5/t/5f3ca9389712b732279e5296/1597811008129/Well_Mitigation_English.pdf.

[3] Community Water Center and San Jerardo Cooperative, Inc. Comments on the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan. May 15, 2020.
https://sgma.water.ca.gov/portal/service/gspdocument/download/4012.

[4] WAT § 106.3 (a).

[5] Senate Floor Analysis, AB 685, 08/23/2012.

[6] This policy is also noted in the Legislative Counsel's Digest for AB 685.

[7] SB 200 (Monning, 2019).

[8] WAT § 106.3 (b).

- **Include a vulnerability analysis of Disadvantaged Communities (DACs) and drinking water supplies in order to protect drinking water for these vulnerable beneficial uses and users.** Although rural domestic and small water system demand does not contribute substantially to the overdraft conditions, drinking water users could face significant impacts, particularly if the region faces another drought. Without a clear commitment and timeline for actions regarding establishing groundwater allocations or reductions in groundwater pumping, the SVB GSA may create disparate impacts on already vulnerable communities. See comments submitted by CWC and San Jerardo Cooperative on April 23, 2021 regarding Chapter 8 of SVB GSA Subbasin GSPs for further recommendations for conducting well impact analyses.
- **Develop the trigger system in collaboration with stakeholders, in particular groups that are more susceptible to groundwater elevation and quality changes, and then connect stakeholder recommendations back to quantifiable measures such as the GSP measurable objectives, MCLs, and numbers of partially or fully dry drinking water wells.**[9]
- **Ensure that the monitoring network is representative of conditions in all aquifers in general, including the shallow aquifer upon which domestic wells rely.** This comment aligns with comments submitted April 23, 2021 regarding Chapter 7 of the SVB GSA Subbasin GSPs, and is particularly crucial as part of a "Trigger" Management Action (or Well Impact Mitigation Program).
- **Routinely monitor for all contaminants that could impact public health (not only nitrate, but also chromium-6, arsenic, 123-TCP, uranium, and DBCP) through the representative water quality monitoring network.** Contaminated drinking water can cause both acute and long-term health impacts and can affect the long-term viability of impacted regions.[10] Among other causes, groundwater contamination can result through the use of man-made chemicals, fertilizers, or naturally-occurring elements in soils and sediments.[11] Routinely monitoring for contaminants will allow the GSA to accurately monitor for impacts on the most vulnerable beneficial users, and protect DACs' and domestic well owners' access to safe and affordable drinking water.[12]
    - **For monitoring network wells with contamination less than 75% of the MCL for all contaminants, the GSP should set MOs at 75% of the MCLs.** The GSP should include MOs as action triggers at 75% of MCL for each constituent of concern so that groundwater can be managed in that area to prevent a minimum threshold exceedance at a representative monitoring well.[13] This buffer is particularly critical with contaminants like nitrate that can cause acute health effects. As discussed in previous

[9] See previous reference for *Framework for a Drinking Water Well Impact Mitigation Program.*
[10] Community Water Center. Guide to Protecting Drinking Water Quality Under the Sustainable Groundwater Management Act. (2019).
https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1559328858/Guide_to_Protecting_Drinking_Water_Quality_Under_the_Sustainable_Groundwater_Management_Act.pdf?1559328858.
[11] See previous Community Water Center (2019) reference.
[12] See previous reference for *Framework for a Drinking Water Well Impact Mitigation Program.*
[13] This recommendation was also made previously in a comment letter to SVB GSA from CWC and San Jerardo Cooperative regarding Chapter 8 of the 180/400 ft Aquifer GSP on November 25, 2020, as well as in our comments to the SVB GSA on April 23, 2021 regarding Chapter 8 of drafts for the SVB GSA Subbasin GSPs.

submitted comments, water quality impacts can intensify as water levels decrease.[14] If the GSA waits until the minimum threshold is exceeded, it may be too late or difficult for actions to be effective. Actions to prevent minimum threshold exceedances should also be clearly explained in this Chapter including a description of what action will be taken, what type of evaluation will be used, under what time period action will take place, and how this action will be funded.

- **Include a combination of different strategies for mitigation including: replacing impacted wells with new, deeper wells, connecting domestic well users to a nearby public water system, or providing interim bottled water.**
- **Include an implementation timeframe, budget, and funding source**.[15] As currently written, the Local Groundwater Elevation Trigger suggests convening "a working group to assess the groundwater situation if the number of wells that go dry in a specific area cross a specified threshold." We support emergency response if one or more wells are impacted, and also request that this section be updated to include strategies to prevent impacts from occuring in the first place. Additionally, plans to address and mitigate those impacts should be solidified beforehand so resources can be mobilized in a timely manner. Drinking water users cannot afford to wait for interim plans to be developed once their primary sources of water for drinking, cooking and hygiene are compromised.

9.1.3 Implementation Action: Domestic Water Partnership

CWC would like to voice preliminary support for the Domestic Water Partnership Implementation Action, as a step towards coordinating local and regional responses to water quality issues. However, we reiterate that the GSA remains directly responsible for recognizing and resolving water quality degradation that results from its policies and projects. We also would like to affirm our previous comments encouraging the SVB GSA to include - without delay - Monterey County water quality data for state and local small water systems. This data is readily available and would add significantly to the proposed water quality monitoring network in draft subbasin Chapters 7. We do not want this potential partnership implementation action to delay the incorporation of this important data source. This action can and should, however, integrate this County data into current draft subbasin plans in order to identify potentially vulnerable populations and create management actions to protect them. We will offer further comments and recommendations on this subject as future drafts are released. To echo recommendations made previously regarding Suggested Partnerships for Multi-Benefit Remediation Projects:

- **The GSA should work with local and regional water agencies or the county to implement groundwater quality remediation projects that could improve both quality as well as levels and to ensure groundwater management does not cause further degradation of groundwater**

[14] Community Water Center and Stanford University. Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium. (2019). https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

[15] See previous reference for *Framework for a Drinking Water Well Impact Mitigation Program.*

quality.[16] The strategic governance structure of GSAs can uniquely leverage resources, provide local empowerment, centralize information, and help define a regional approach to groundwater quality management unlike any other regional organization. When implemented effectively, GSPs have the potential to be instrumental in reducing levels of contaminants in their regions, thus reducing the cost of providing safe drinking water to residents. GSAs are the regional agency that can best comprehensively monitor and minimize negative impacts of declining groundwater levels and degraded groundwater quality that would directly impact rural domestic well users and S/DACs within their jurisdictions. When potential projects are proposed, SVB GSA should consider how projects could potentially both positively and negatively impact groundwater quality conditions and should take leadership in coordinating regional solutions.

[16] Community Water Center and San Jerardo Cooperative, Inc. Comments on the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan. May 15, 2020.
https://sgma.water.ca.gov/portal/service/gspdocument/download/4012.

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May 12, 2021

Emily Gardner
Salinas Valley Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA 93924

RE: Sustainable Management Criteria, Eastside Subbasin GSP Draft Chapter 8

Dear Emily:

Thank you for the opportunity to submit the following comments. I am writing on behalf of Provost & Pritchard (P&P) clients with agricultural operations in the Eastside Subbasin area.

The comments provided below reflect concerns our clients have expressed regarding the Eastside Subbasin Groundwater Sustainability Plan (GS), Chapter 8, Sustainable Management Criteria (SMC), dated March 11, 2021.

In reviewing Chapter 8, it is unclear what actions will be triggered if a Sustainability Indicator's Minimum Threshold (MT) is exceeded. Will actions be discussed in a separate chapter of the draft Eastside Subbasin GSP or the draft Salinas Valley-Wide Integrated GSP (Integrated Plan)? We were unable to find this information by quickly reviewing published draft chapters. Perhaps, the actions are yet to be written? If so, it would be helpful to stakeholders if the actions for addressing undesirable impacts were clearly communicated in the Eastside Subbasin GSP or the Integrated Plan (or both).

Additionally, there is concern with respect to the MT related to the sustainability indicator, Degraded Groundwater Quality, in draft Chapter 8 of the Eastside Subbasin GSP:

> *"Minimum threshold is zero additional exceedances of either the regulatory drinking water standards (potable supply wells) or the basin objectives (agriculture supply wells) for groundwater quality constituents of concern [page 8-6]."*

To avoid the following undesirable result:

> *"There shall be no additional minimum threshold exceedances beyond existing groundwater quality conditions during any one year as a direct result of project or management actions taken as part of the GSP implementation [page 8-6]."*

This may be logical from a legal perspective; however, there is concern about the practicability of this MT. It seems to contravene conclusions in the March 2012 State Water Board SBX 2 1 Nitrate Project Report titled, Addressing Nitrate in California's Drinking Water, [aka The Harter Report]. In the report's Executive Summary, the first finding is:

> *"Nitrate problems will likely worsen for decades. For more than half a century, nitrate from fertilizer and animal waste have infiltrated into Tulare Lake Basin and Salinas Valley aquifers. Nitrate will spread and increase nitrate concentrations in many areas for decades to come, even if the amount of nitrate loading is significantly reduced. Most nitrate in drinking water wells today was applied to the surface decades ago. [page 2, Summary of Key Findings Table, Finding Number 1]"*

Based on the above, it is safe to assume that Water Quality will continue to decline in the Salinas Valley and the Eastside Subbasin. Subsequently, the question becomes "how will the Salinas Valley Basin GSA determine whether increased nitrate concentrations are due to existing 'legacy' nitrogen or a direct result of actions taken by the SVBGSA?" Again, it would be helpful if this were clearly articulated in Chapter 8 or elsewhere in the Eastside Subbasin GSP or the Valley-wide Integrated GSP.

In closing, we appreciate the work that the GSA has done in preparing the Eastside Aquifer Subbasin GSP and thank you for consideration of the above comments as part of this planning process.

Sincerely,

Heather Billing

Heather Billing
Environmental Specialist
Provost &Pritchard

SALINAS BASIN
AGRICULTURAL WATER ASSOCIATION

SALINAS BASIN AGRICULTURAL WATER ASSOCIATION, INC.
1140 Abbott St., Ste. C
Salinas, CA 93901
831/751-3100

May 12, 2021

Salinas Valley Basin Groundwater Sustainability Agency
Board of Directors
P.O. Box 1385
Carmel Valley, CA 93924

VIA: Email to SVBGSA General Manager

RE: Groundwater Sustainability Plans – Water Quality Objectives

Dear SVBGSA Chair Adcock and Directors:

Salinas Basin Agricultural Water Association is a coalition of agricultural organizations tasked with overseeing the implementation of the Sustainable Groundwater Management Act (SGMA) and the development of the groundwater sustainability plans for the Salians Valley groundwater aquifer. Our organization has been integrally involved in groundwater management since this passage of SGMA and the formation of the SVBGSA.

Watching the development of the groundwater sustainability plans for the five sub-basins, due in January 2022, there appears to be attention drawn by various stakeholders to specific groundwater quality references that are under the jurisdiction of the Central Coast Regional Water Board (RWB).

On April 15, 2021, a new Irrigation Lands Regulatory Program was adopted by the RWB, also knows as Ag Order 4.0. This program manages farming activities to specific water quality objectives, including the amounts of nitrogen that can be either applied or discharged from production fields, to either surface or groundwaters. Farming operations will be required to calculate their "Applied-Removed ratio" for each crop produced, meeting specific compliance standards that are ratcheted down each successive year. Additionally, each domestic-use well located on a farming operation must be tested annually for a broad set of water quality constituents.

Water quality objectives are heavily managed by Ag Order 4.0 and will be costly for farming operations and their landowners to implement. Record keeping, annual compliance reporting, and cooperative monitoring fees will add heavily to the burden of farm management and financial sustainability.

As the groundwater sustainability plans are developed, discussed by the Sub-basin Committees, and ultimately brought to the Advisory Committee and SVBGSA Board for approval, it should be clearly stated within those forums that water quality objectives for farming operations are managed under Ag Order 4.0 by the RWB, and that SVBGSA should not set any additional water quality parameters within the groundwater sustainability plans.

Conflicting and duplicative water quality objectives, if included in the groundwater sustainability plans, would lead to unnecessary costs for farming operations and landowners. Due consideration should be given to the Ag Order 4.0 program and how water quality objectives will be managed on-farm going forward, limiting groundwater sustainability plans to manage the balance of extractions and recharge for each respective sub-basin.

Thanks for your consideration.

Sincerely,

Norman C. Groot
President

T0: Salinas Valley Groundwater Sustainability Agency

From: Fred Nolan as public commentary

(montereyfred@gmail.com)

Subject: Suggested Solution to the groundwater sustainability in Monterey County

As I no longer use pen and pencil nor do I type due to Parkinson's disease I am dictating this with Dragon NaturallySpeaking.

The solution to all groundwater sustainability is not desalinisation. It is the reuse of the water we already have. The largest water reuse facility in the world is right here in California. Orange County produces in their ground water replenishment system enough drinkable water for 2 1/2 million people. On a vastly smaller scale we can do the same thing.

Recycling water is one third the cost desalinated ocean water. Building a desalinisation length costs approximately $200 million dollars. The probability of raising that kind of money in central California is ZERO.

I suggest we study Orange County's impressive recycling system. They have a number of very illuminating websites. The time has come to get over unscientific reservations about recycled water. The time for recycled water is here. Plant in Marina produces a small amount of high quality recycled water right now. By dramatically increasing the output of this desirable commodity we can meet our water needs indefinitely. If we are scientifically capable of putting robots on Mars we are capable of producing exquisite water over and over again.

Fred Nolan

COMMUNITY WATER CENTER
EL CENTRO COMUNITARIO POR EL AGUA

San Jerardo Cooperative, Inc.

June 17, 2021

Salinas Valley Basin Groundwater Sustainability Agency
Submitted electronically to:

Emily Gardner, Deputy General Manager
Donna Meyers, General Manager

Re: Comments on the Draft Salinas Valley GSP Chapters 2, 9, and 10 for the Langley, East Side, Forebay, and Upper Valley Subbasins

Dear Salinas Valley Basin Groundwater Sustainability Agency:

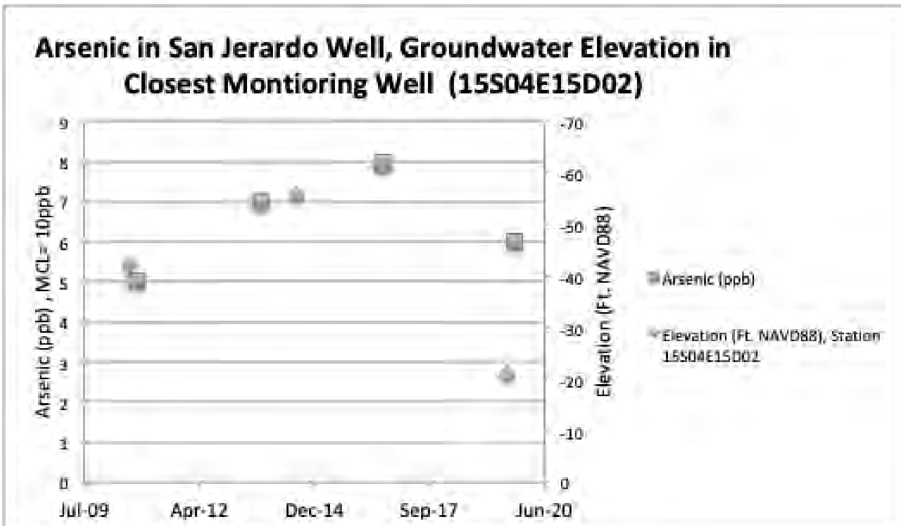
The Community Water Center (CWC) and the San Jerardo Cooperative would like to offer comments and recommendations in response to the draft Groundwater Sustainability Plans (GSPs) Chapters 2, 9, and 10 for the Langley, East Side, Forebay, and Upper Valley Subbasins that were released mid-2021 by the Salinas Valley Basin Groundwater Sustainability Agency (SVB GSA). These comments are intended to add to the public record and are submitted in addition to previous written and spoken comments.

We reiterate the following context for this comment letter and the San Jerardo Cooperative's participation in particular. The challenges facing San Jerardo and similar communities throughout all the subbasins in the Salinas Valley are the foundation of our comments in this letter. The San Jerardo Cooperative's well is highly vulnerable to changes in groundwater levels and groundwater quality. Over decades of living and working at San Jerardo Cooperative, Advisory Committee Member Horacio Amezquita has observed firsthand how the irrigation practices on properties surrounding the cooperative impact the water quality in their current and former wells. The San Jerardo Cooperative receives drinking water from a small public water system (CA2701904) and is very concerned that pumping, irrigation practices, and groundwater management in the East Side Subbasin will cause their drinking water well, which currently meets all drinking water standards, to exceed the maximum contaminant levels for arsenic and/or nitrate. Unfortunately, data from the State Water Board indicates increasing levels of nitrate and arsenic in their well with a high arsenic level of 8 ppb on 8/22/2016 that also corresponds to a low groundwater elevation of -61.5 in Station 15S04E15D02, the closest monitoring well to the San Jerardo Cooperative's well (See CWC Figures 1 and 2).[1] While there are too few monitoring data points to draw significant conclusions, CWC Figure 1 does suggest that arsenic levels are higher when groundwater levels are lower. Scientific studies confirm that contaminants like arsenic,

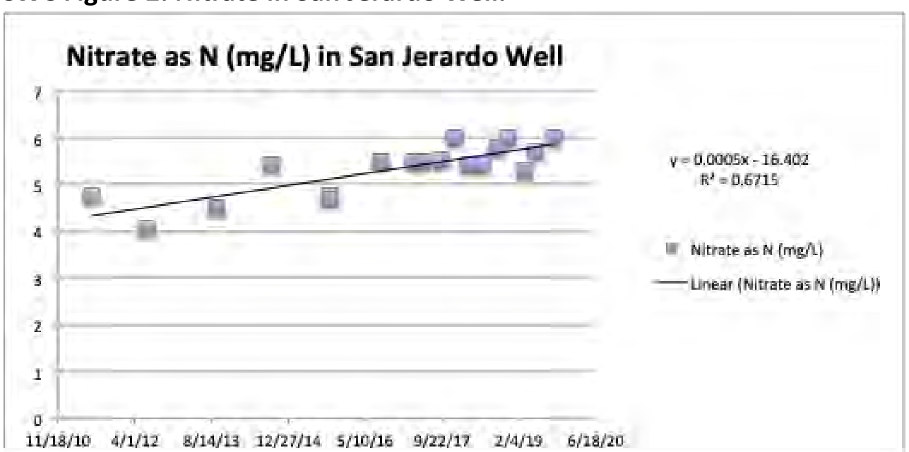
[1] CWC Figure 1 contains all available arsenic data from the State Water Board's Drinking Water Watch online database (https://sdwis.waterboards.ca.gov/PDWW/) which was collected in October 2010, 9/11/13, 8/22/16, and 9/23/19. We then added the monitoring data for Station 15S04E15D02 for the dates most close to the arsenic sampling dates (August 2010, August 2014, August 2016, and August 2019). CWC Figure 2 data was also downloaded from the same online database.

uranium, and chromium (including hexavalent chromium) are more likely to be released under certain geochemical conditions influenced by pumping rates, geological materials, and water level fluctuations.[2]

CWC Figure 1: Arsenic in San Jerardo Well, Groundwater Elevation in Closest Monitoring Well
(Note: The groundwater elevation y-axis is reversed to illustrate that lower groundwater elevations are associated with higher arsenic levels.)



CWC Figure 2: Nitrate in San Jerardo Well.



We provide more specific chapter-by-chapter comments below. We also reiterate our recommendation that the GSP should be revised throughout to acknowledge the science showing that groundwater pumping and groundwater level changes can influence water quality. This recommendation is supported by DWR's 180/400 ft Aquifer GSP Determination on June 3, 2021:

[2] Community Water Center and Stanford University (2019). *Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium*. Available at: https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

"**[S]taff find that the approach to focus only on water quality impacts associated with GSP implementation, i.e., GSP-related projects, is inappropriately narrow.** Department staff recognize that GSAs are not responsible for improving existing degraded water quality conditions. **GSAs are required; however, to manage future groundwater extraction to ensure that groundwater use subject to its jurisdiction does not significantly and unreasonably exacerbate existing degraded water quality conditions.** Where natural and other human factors are contributing to water quality degradation, the GSAs may have to confront complex technical and scientific issues regarding the causal role of groundwater extraction and other groundwater management activities, as opposed to other factors, in any continued degradation; but **the analysis should be on whether groundwater extraction is causing the degradation in contrast to only looking at whether a specific project or management activity results in water quality degradation**. Department staff recommend that the SVBGSA coordinate with the appropriate water quality regulatory programs and agencies in the Subbasin to understand and develop a process for determining when groundwater management and extraction is resulting in degraded water quality in the Subbasin (see Recommended Corrective Action 5)."[3]

We reiterate our strong recommendation that the GSPs incorporate a more robust and representative monitoring network and minimum thresholds to protect vulnerable communities like San Jerardo and those dependent on shallow domestic drinking water wells. This network should include state and local small water systems.

Thank you for reviewing this letter and for the consideration of our comments on the draft GSP chapters. We look forward to working with the SVB GSA to ensure that the GSPs are protective of the drinking water sources of vulnerable, and often underrepresented, groundwater stakeholders. Please do not hesitate to contact us with any questions or concerns. We also look forward to meeting with you in the future to further discuss issues raised in this and past comments.

Sincerely,

Heather Lukacs

Heather Lukacs
Community Water Center

Horacio Amezquita

Horacio Amezquita
General Manager, San Jerardo Cooperative, Inc.

Justine Massey

Justine Massey
Community Water Center

Mayra Hernandez

Mayra Hernandez
Community Water Center

[3] Department of Water Resources. (2021). *Statement of Findings Regarding the Approval of the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan.* Pp. 26-27. (Internal citations omitted; emphasis added). Available for download at: https://sgma.water.ca.gov/portal/gsp/status.

GSP Chapter 2: Communications and Public Engagement

Community Water Center appreciates the statement found in Chapter 2 of the Langley, Eastside, Forebay, and Upper Valley subbasins: "[T]he success of the... Subbasin GSP will be determined by the collective action of every groundwater user."[4] Public engagement invites citizens to get involved in deliberation and to take action on public issues that are important to them. More importantly, it helps leaders and decision-makers have a better understanding of the perspectives, opinions, and concerns of citizens and stakeholders, especially those who are traditionally underrepresented. DWR's Guidance for Stakeholder Communication and Engagement acknowledges that public engagement, when done well, goes far beyond the usual participants to include those members of the community whose voices have traditionally been left out of political and policy debates.[5] Additionally, as part of a Strategic Planning Review, SVB GSA has recently recognized an overrepresentation of agricultural interests in its GSP formation process and voiced interest in balancing its representation. In this light, we offer the following recommendations:

- **Specify which outreach strategies will be used to reach underrepresented communities and disadvantaged communities.** The proposed goals for communication and engagement actions and strategies in this chapter are in some senses robust, but lack important details to ensure that all beneficial users, especially underrepresented communities and disadvantaged communities, will have access to all of the resources that are being proposed. It must be noted that underrepresented communities and disadvantaged communities may not have access to the internet, therefore they may not have access to the online resources on either the SVB GSA website or through social media. Additionally, in the case that they do have access to the internet, they may lack knowledge or familiarity regarding how to access the online resources.
- **Fast-track stakeholder outreach efforts in order to meaningfully engage beneficial users throughout the basin in the GSP development process currently underway.** SGMA specifically requires GSAs to "encourage the active involvement of diverse social, cultural, and economic elements of the population within the groundwater basin *prior to and during the development and implementation of the groundwater sustainability plan."*[6]
    - Based on our review of the language in Chapter 2 of the Subbasin GSPs, it seems like the outreach and engagement strategies outlined in Section 2.7, which are specific to the underrepresented communities and disadvantaged communities in the Basin, are to be put in place after the GSP is submitted in 2022.
    - This delay would result in little to no participation or input from these communities during the GSP development process currently underway. The regulations similarly require that a GSP summarize and identify, "opportunities for public engagement and a discussion of how public input and response will be used."[7] The GSA thus must engage,

[4] SVB GSA (2021). *Subbasin GSPs Draft - Chapter 2: Goals for Communication and Public Engagement.* P. 10 (in all drafts). Available at: https://svbgsa.org/subbasins/.

[5] DWR (2018). *Guidance Document for Groundwater Sustainability Plan: Stakeholder Communication and Engagement.* Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Assistance-and-Engagement/Files/Guidance-Doc-for-GSP---Stakeholder-Communication-and-Engagement.pdf.

[6] Water Code §10727.8. (Emphasis added).

[7] 23 CCR §354.10(d)(2).

"diverse social, cultural, and economic elements of the population within the basin."[8] SGMA Regulations recognize that failure to engage adequately with a diverse cross-section of the public undermines the likelihood that a GSP will avoid undesirable results and meet its sustainability goal.[9]

- **Provide a strategy for how to reach stakeholders with limited or no SGMA knowledge.** In Subbasin GSPs' Section 2.6.3, SVB GSA acknowledges that there is a "variety of audiences targeted within the Basin whose SGMA knowledge varies from high to little or none." However, no strategy is provided for how those with no knowledge will be reached. This chapter should be modified to include more details on how and what additional strategies will be implemented to ensure that SVB GSA is reaching all beneficial users. We recommend the following approaches:
    - **Include more grassroots-based approaches, which are critical to actually reaching stakeholders and fulfilling the GSA's goal.** One of the goals of the CPE Actions which we strongly support is to "invite input from the public at every step in the decision-making process and provide transparency in outcomes and recommendations." However, based on the communication/ outreach strategies mentioned in the chapter, efforts fall short of inclusivity. The general public does not always have access to certain resources like the internet, and even if they do have access they may not know how to use social media, use email, or browse the web.
    - **Document and continue the policy of providing translation services at public meetings and of providing bilingual (English and Spanish) information and materials on the website, via email, and paper mail.** The Dymally-Alatorre Bilingual Services Act requires that public agencies serving over 10% of non-English speaking constituents provide appropriate translation services.[10] At a minimum, translated information should be provided during Plan updates and prior to critical decisions. In particular, the submitted GSP released during the formal comment period should include bilingual materials highlighting key summaries of the GSP. Critical decision points also include the adoption of groundwater fees, the approval of new groundwater projects or management actions, and decisions around pumping restrictions.
    - **Consider inserting short notices in water bills and/or community newsletters on a monthly basis (notices should include key messages, visuals and information that is relevant to the average water user).** These notices must be translated as described above.
    - **Specify how and when the accessible and culturally responsive GSA materials mentioned in Section 2.7 will be developed to communicate impacts of groundwater management on local water conditions and how they will be delivered or made available to URCs and DACs that don't have internet access.** Accessibility includes appropriate visual content and translation.
    - **Consider using USPS every door direct mail (EDDM) to send out educational materials and updates to all stakeholders.** This tool can be used to map ZIP Code(s) and neighborhoods, it also has a filter feature that lets you filter by age, income, or

[8] DWR (2018). *Guidance Document for Groundwater Sustainability Plan: Stakeholder Communication and Engagement.* P. 1. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Assistance-and-Engagement/Files/Guidance-Doc-for-GSP---Stakeholder-Communication-and-Engagement.pdf.

[9] 23 CCR §355.4(b)(4).

[10] California Government Code §7290.

household size using U.S. Census data. This tool can be helpful to reach stakeholders that don't have internet access.

- **Clearly identify and utilize existing community venues (on a monthly basis if possible) for community meetings, workshops, and events to provide information**. For example, the GSA could hold educational workshops during water board and school district board meetings, or after church services. Venues should be carefully selected in order to meet the needs of the targeted audience.
- **Clearly identify radio channels, social media avenues, websites, and other media outlets readily accessible to the community**. The submitted GSP should be revised with a policy requiring a broader outreach effort in the near future, with bilingual outlets.
- **Specify a timeline to work with key community leaders or trusted messengers on at least a monthly basis to distribute information and encourage community participation.** Venues for such leaders to share information could include churches, civic groups, clubs, non-profit organizations, and schools.
- **Consider hosting Spanish-only outreach meetings, as they can be more effective in transferring knowledge and receiving feedback.** It can be a challenge to provide real-time translation of technical groundwater terms and concepts in a way that is understandable and promotes participation, so it may be appropriate to conduct a meeting entirely in Spanish so that participants can be fully immersed in the discussion.
- **Consider hiring a bilingual Stakeholder and Outreach Communication specialist as part of the SVB GSA staff.** As expanding the GSAs audience reach and maintaining a robust stakeholder list of interested individuals, groups and/or organizations is a good step to ensure that the general public is informed about the GSA's activities, it may take a lot of time and effort to develop a clear methodology to conduct focused outreach to obtain a representative list of all stakeholders (more inclusive of just those who engage online) and make sure they stay informed and engaged.

GSP Chapter 9: Projects and Management Actions

Projects and Management Actions should benefit the basin and all beneficial users. While determining how those benefits will be distributed based on the nature of different projects and actions, and who should bear the associated costs, the SVB GSA should keep in mind the **"polluters pay" principle,** in combination with the **"users pay for benefits" principle**. While it makes sense to associate local benefits with local cost-share, drinking water users should not be put into the position of shouldering additional costs to protect their basic Human Right to Water. Domestic water use has not led to overdraft conditions, as evidenced by the statutory designation of "de minimis" use. Nor should benefits be distributed based on which interested parties can most easily fund a project, but rather towards the overall sustainability of the basin and equity of benefits among beneficial users.

Recharge Projects (Direct or Indirect)

We offer the following overarching comments regarding Recharge Projects in the Subbasin GSPs:

- **Assess constituents in the ground before using land for recharge, to avoid further contamination.** Reference the Groundwater Recharge Assessment Tool (GRAT) developed by Sustainable Conservation.[11]
  - On-farm recharge has the potential to further spread contaminants. Soil contaminants should be measured before dedicating the land to recharge purposes. "Short-term" impacts on domestic wells due to recharge efforts, which can include increased leaching of certain contaminants such as uranium, or displacement of contaminant plumes, should be mitigated in order to minimize the harm to beneficial drinking water users, and to replace water sources if compromised.[12]
- **Implement recommendations from our previous comment letter regarding Section 5.4, as they are also pertinent to successful recharge management**:
  - "**[I]nclude a specific discussion, supported by maps and charts, of the spatial or temporal water quality trends for all constituents that have been detected in the subbasin and may affect drinking water beneficial users, as required under 23 CCR § 354.16(d).** This section should include water quality data (both in map and tabular form) for all constituents (where available) with primary drinking water standards that have been detected in the subbasin including, but not limited to, nitrate, 123-trichloropropane, hexavalent chromium, arsenic, uranium, and perchlorate for all public drinking water wells, state and local small water system wells, and private domestic wells. It is especially important for all groundwater stakeholders to be able to understand and visualize the location of contaminant hotspots throughout each subbasin.
  - **Present maps and supporting data for all constituents of concern.** The review of water quality data in the groundwater conditions section of the draft Section 5.4 in the subbasin GSPs is focused primarily on nitrate. The GSPs identify numerous constituents that have been detected in groundwater above drinking water standards, but, with the exception of nitrate, do not present this data spatially. Even though the subbasin GSPs set water quality minimum thresholds for additional constituents (See Tables 8-4 and 8-5), the supporting data is not all presented, and no analyses of spatial or temporal water quality trends are presented. This does not present a clear and transparent assessment of current water quality conditions in the subbasin with respect to drinking water beneficial use (23 CCR § 354.16(d))."[13]
- We appreciate the identification of multi-benefit improvements to streams, and agree that slowing the speed of groundwater in its course of movement is a useful way to increase recharge. Such improvements to multi-benefit streams are a cost-effective and low-harm recharge method.

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[11] Sustainable Conservation. *Groundwater Recharge Assessment Tool.* https://suscon.org/wp-content/uploads/2016/08/GRAT-Summary-8-2017.pdf.

[12] Community Water Center and Stanford University (2019). *Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium*. Available at: https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

[13] Community Water Center and San Jerardo Cooperative, Inc. *Comments on the Draft Salinas Valley GSP Chapters 1-8 for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins.* (April 2021). P. 7. On file with SVB GSA and available at: https://drive.google.com/file/d/1wH7wvCMmQd4bu_PIri5o66_y5caW9ti7/view.

Reoperation of Reservoirs

We offer the following overarching comments regarding Reoperation of Reservoirs projects:

- **Conduct holistic cost-benefit analyses for large-scale infrastructure projects such as the MCWRA Interlake Tunnel and Spillway Modification, taking into account the specific benefits that projects will or will not confer on underrepresented communities and DACs, including the San Jerardo Cooperative in the Eastside Subbasin.**
    - Benefits should be equitable and take into account how different climate projections would impact the potential benefits from such a project in the case of little to no rainfall.
    - Cost-benefit analyses should also consider alternatives that could provide affordable long-term benefits.
- **The MCWRA Drought TAC should ensure that all beneficial water users are considered, and that drinking water needs are particularly protected from harm during current and future droughts, in line with the Human Right to Water.**

Management Actions

Conservation and Agricultural BMPs

- **Best Management Practices (BMPs) should utilize the latest technologies and take advantage of opportunities to modify agricultural pumping needs in order to provide overall groundwater basin benefits for all beneficial users.**
- **BMPs should also be used as a mechanism to improve or stabilize groundwater quality by using evapotranspiration (ET) data with soil moisture sensors and soil nutrient data to promote efficient irrigation practices and limit the application of synthetic fertilizers.**
- **BMPs should include best available science, including climate-smart approaches and nature-based solutions which have been recognized on state, national, and international levels.** For example, while written with the Central Valley in mind, FoodFirst's *Healthy Soils, Healthy Communities* outlines the following strategies and benefits which can also be applied to the Central Coast:
    - **Soil organic matter can reduce soil fumigant emissions** – Pesticides applied directly to soils form short-lived climate pollutants, and contribute to air and water pollution. Increased soil organic matter can reduce fumigant emissions and reduce the need for fumigants in the first place.
    - **Soil organic matter slows water contamination** – Synthetic fertilizer and pesticides have contaminated drinking water in the Central Valley over the last 70 years. Soils higher in organic matter leach fewer pollutants, including nitrates and pesticides. Soils high in organic matter also require less synthetic fertilizer to produce a crop. Using compost instead of synthetic fertilizer can reduce nitrogen loads in the Valley. Over time, increased soil organic matter and riparian restoration could help reduce groundwater contamination.

- **Composted manure from dairies could be a source of soil organic matter** – Concentrated manure from industrial dairies is a major local air quality and water quality issue. If that manure were composted, it could become a source of valuable nutrients and soil organic matter instead of a pollutant, and help displace the use and manufacture of synthetic fertilizers.
- **Composting farm waste could prevent black carbon emissions** – Instead of burning orchard waste, another local air pollutant, mulches and composted farm waste could be a source of soil organic matter for farms and rangelands.
- **Rural workforce development and wildfire management** – From the Conservation Corps, to ecological restoration, nursery stock production, wetland management and fire prevention, there is a lot of work to do to conserve and increase terrestrial carbon on public and private lands. This is an opportunity to both train and employ young people with low-to-moderate incomes and in communities of color in natural resource and agricultural management.
- **Carbon-friendly practices can support small scale and immigrant farmers** – Public support for carbon-friendly practices could help make small to mid-scale and immigrant farmers more resilient and boost their bottom line through a combination of financial support for carbon-friendly practices and more stable land access. These programs will have to be accessible to small scale farmers and take into account chronic issues around access to land, credit and technical assistance.
- **Healthy food systems in the San Joaquin Valley** – Soil carbon is part of a much larger project to re-design food systems that better support people and the environment in the San Joaquin Valley.[14]

Fallowing, Fallow Bank, and Agricultural Land Retirement

- **Dewatered drinking water wells or migration of contamination plumes should be considered as factors when deciding where to incentivize targeted agricultural fallowing or land retirement, and should trigger pumping restrictions in affected areas as necessary.** This approach is further elaborated in the Drinking Water Well Impact Mitigation Framework[15], which has been shared with the GSA and is in the process of being partially integrated into another section of the Subbasin GSPs.

Forebay Pumping Technical Advisory Committee (TAC)

- **Quantify the necessary demand reductions (pumping restrictions) in order to meet all minimum thresholds in the short and long-term, including in dry conditions. Parameters for pumping restrictions in times of widespread water shortages should be decided ahead of time**

[14] Food First- Shattuck, et al. (April 2017). *Healthy Soils, Healthy Communities: Opportunities to Bridge Environmental Justice and Soil Carbon Sequestration*. P. 3. Available for download at: https://foodfirst.org/publication/healthy-soils-healthy-communities-opportunities-to-bridge-environmental-justice-and-soil-carbon-sequestration/.

[15] Self-Help Enterprises, Leadership Counsel for Justice and Accountability, Community Water Center (2020) *Framework for a Drinking Water Well Impact Mitigation Program*. Available at: https://static1.squarespace.com/static/5e83c5f78f0db40cb837cfb5/t/5f3ca9389712b732279e5296/1597811008129/Well_Mitigation_English.pdf.

as part of a publicly-informed, adaptive management approach. Decisions around pumping regulation should be made as part of GSP development and not relegated to a later decision-making body which will be inherently less accountable to the public than SVB GSA's current Committees and Board. It will not be sufficient to solely bring pumping decisions to the public after actions have already been designed and are at the point of being approved. Lack of public input for such a critical component of the GSA's management is especially troubling in the negative—if action is not being taken.

- **As part of an adaptive management approach, pumping restrictions should be implemented by the GSA in a timely way so as to prevent harm to beneficial users, particularly vulnerable drinking water users and DACs.** As currently proposed, there is no set criteria for when or to what extent pumping restrictions would be implemented, except for the general outline that they may go into effect in the summer months. The timeline for the Ad Hoc group to be summoned, create a plan, and put that plan into action is simultaneously compressed (planning should occur ahead of time, as the comment above stresses), and delayed—pumping should be curtailed in response to on-the-ground conditions, which may show stress much earlier than the summer months when domestic wells are potentially already going dry due to insufficient groundwater levels.

SMC Technical Advisory Committee (TAC)

- **Create management zones with pumping restrictions in areas with vulnerable drinking water wells.**
- **The SMC TAC should consider and recommend projects and management actions that mitigate groundwater quality degradation for drinking water users due to GSA actions, including impacts resulting from over-extraction under GSA management, as was clarified in DWR's 180/400ft Aquifer Determination Letter on pages 26 and 27.**

Pumping Allocations and Control

- **Quantify demand reductions necessary in order to meet all minimum thresholds in the short and long-term, including considering water quality impacts.** Designing a feasible and effective allocation structure requires thorough groundwater elevation data as well as a comprehensive, ongoing assessment of the interrelated effects of SMCs on one another. Pumping allocations must be responsive to groundwater conditions throughout the basin and avoid undesirable results.
- **Consider hybrid allocation systems which account for de-minimis users, regardless of homeownership status, to ensure sustainable yields for all beneficial users.** Langley GSP proposes such a hybrid allocation system in which de-minimis users are included within the estimated sustainable yield. This approach will provide a more complete picture of groundwater use within the basin, to inform groundwater management decisions.

Floodplain Enhancement and Recharge

- **Floodplain restoration should consider contaminants in any area selected for recharge to avoid transport of any contamination plumes into the aquifer.**

Implementation Projects

Groundwater Elevation Management System (GEMS) Expansion

- **Include data from more drinking water wells, including small water system wells and domestic wells, in order to have a sufficiently representative monitoring program.**

Water Quality Partnership (formerly Domestic water partnership)

- **Integrate key components of a Drinking Water Well Mitigation Program Framework in order to protect drinking water users from losing access to their drinking water during GSP implementation.** We appreciate that SVB GSA has begun this process of incorporating concepts from the Mitigation Framework, and we plan to offer further information including a presentation to the Committees and Board.
- **Integrate water quality considerations across planning and implementation.** Groundwater quality in the Subbasins can be influenced by pumping and the way groundwater is managed. This is of particular importance for the San Jerardo Cooperative who has experienced increases in nitrate and arsenic in their well, as highlighted in our cover letter and previous comments.[16]
    - Support for this recommendation is evidenced by Recommendation #5 of DWR's 180/400 GSP Determination.
- **Fill previously identified water quality data gaps in baseline information and the monitoring network.**
    - DWR assesses water quality monitoring in the 180/400ft Aquifer as follows: "The monitoring network to evaluate degradation of groundwater water quality is based on three existing water quality regulatory programs operating in the Subbasin: Monterey County's small community water system wells program, the State Water Resources Control Board's public supply well program, and the Central Coast Water Board's Irrigated Lands Regulatory Program. The Plan proposes to use four sets of wells that are routinely sampled under these programs. Within each set of wells, a specific set of constituents of concern will be monitored. In total, the monitoring network consists of 136 small community water system wells, 51 public supply wells, and a currently unknown number of domestic and agricultural wells from the Irrigated Lands Regulatory Program. The specific number of Irrigated Lands Regulatory Program wells will be finalized when the Central Coast Water Board adopts Agricultural Order 4.0 (anticipated in 2020). The Plan identifies the lack of well construction information (e.g., the depth of well screens or the total depth of the well) for many groundwater quality monitoring wells as a data gap. The implementation chapter of the Plan simply states that "[d]uring implementation, the SVBGSA will obtain any missing well information, select wells to include in monitoring network, and finalize the water quality network." Department staff recommend the SVBGSA provide updates on the

[16] Community Water Center and San Jerardo Cooperative, Inc. *Comments on the Draft Salinas Valley GSP Chapters 1-8 for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins.* (April 2020). Pp. 4-5. On file with SVB GSA and available at: https://drive.google.com/file/d/1wH7wvCMmQd4bu_PIri5o66_y5caW9ti7/view.

progress toward filling this data gap in its annual reports and that more details be provided in the first five-year assessment of the Plan."[17]

Localized Groundwater Elevation Triggers

This implementation project is an important component of the Subbasin GSPs, for tracking and responding to impacts due to droughts and overdraft. We recommend:

- **Integrate technical assistance into this program, facilitate access to resources through a collaboration with state agencies and/or directly administer impact mitigation funding.**
  - Tracking instances of dry or depleted wells and linking impacted beneficial users to information about potential available resources is a positive step, however services such as directing DACs and other impacted drinking water users to apply for funding would only be minimally helpful while those households are experiencing a water shortage crisis. The GSA's efforts to respond to impacts due to low groundwater elevations should go further in order to be effective. Such services should include reducing pumping in areas where groundwater supply shortages are being exacerbated by over extraction, actively facilitating coordination between residents and assistance programs, and potentially providing a conduit to state funds directed towards water resiliency—a multi-billion dollar drought & water resiliency package is currently being finalized in the State Legislature.

Well Registration

- **We reiterate our recommendation that SVB GSA require all wells to be metered and charge fees based on the amount of water pumped, to pay for future projects and incentivize voluntary reductions.**

Support Protection of Areas of High Recharge

- **Develop criteria for recharge projects that prevent unintended impacts to drinking water.**
- **For all recharge projects, evaluate whether recharge could have any unintended consequences such as moving contaminant plumes to wells that are currently not contaminated, and closely monitor water quality in areas affected by recharge.**
- **Encourage use of low-impact cover crops where water is captured at the site of precipitation.** Roots in the soil help to capture more water, clean the water source, and maintain healthy soils so that less fertilizer/pesticide is used, as evidenced in organic and regenerative agricultural practices. Cover crops and compost cycles, as well as chicken manures or natural organic-matter fertilizers can also keep nitrogen in the soil longer, providing benefits to crops and keeping nitrate out of groundwater).

New Water Supply Projects

- **Quantify which combinations of projects could address projected overdraft and what the costs of those combinations would be.** With high costs, permitting and other challenges, there is a

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[17] Department of Water Resources. (2021). *Statement of Findings Regarding the Approval of the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan.* Pp. 30-31. (Internal citations omitted). Available for download at: https://sgma.water.ca.gov/portal/gsp/status.

high degree of uncertainty whether each project can be implemented. As written, it is difficult to evaluate how feasible it is to address overdraft via the options provided.
    - For example, in the Eastside GSP draft, Table 6-15 in Chapter 6 projects 20,400 AF/yr overdraft in 2030 and 20,500 AF/yr overdraft in 2070. Table 9-8 in Chapter 9 lists projects that could mitigate overdraft. However, Table 9-8 only quantifies benefits for some of the projects, and often for the Salinas Valley basin as a whole as opposed to the Eastside Subbasin. The table also omits costs. This information will be critical for planning and implementing projects to address overdraft.
- **Factor in known uncertainties when determining which projects to prioritize in implementation.** At the top of pg 9-24 for 11043 Diversion at Chualar, and also for 11043 Diversion of Soledad, the GSP states that the groundwater model used to estimate Salinas River flows "does not account for the uncertainty surrounding greater variations in precipitation, timing, intensities and subsequent flows." The model should provide a sensitivity analysis for potential conditions, particularly in light of large variations between climate change predictions in the region.
    - This recommendation is also in line with DWR's 180/400 Determination which instructs SVB GSA to determine how they will define "average hydrogeological conditions,"in Section 4.3.3.2 and the overarching statutory requirement to continually update the GSP to meet the statutory requirement to use the "best available information and best available science."[18]
- **Where projects overlap between subbasins, clarify what effects the project will have across subbasins.** For example, provide clarity around what effects the Eastside Irrigation Water Supply Project (or Somavia Road Project) will have on the 180/400 Foot Aquifer Subbasin where water will be pumped from. Account for any effects in the 180/400-Foot GSP in ongoing updates, including pertinent sections of Annual Reports.

GSP Chapter 10: Groundwater Sustainability Plan Implementation

Our overarching recommendations for GSP Implementation and Updates are as follows:
- **Take interim actions while working toward long-term sustainability.**
- **Address missing data for domestic wells as recommended by DWR:**
    - "[T]he GSA should inventory and better define the location of active wells in the Basin and document known impacts to drinking water users caused by groundwater management … in subsequent annual reports and periodic updates."[19]
- **Continue to include the small water system data from the County as a data gap in the subbasin GSPs, as it was in the 180/400 foot Aquifer GSP.** As Tom Berg, a DWR representative, indicated at the SVB GSA Advisory Committee meeting on June 17, 2021, the specific decisions made during the formation of the 180/400 foot Aquifer GSP allowed for it to receive DWR's approval. Mr. Berg recommended that the SVB GSA review the three other letters that DWR released on

[18] 23 CCR § 355.4(b)(1).
[19] Department of Water Resources. (2021). *Statement of Findings Regarding the Approval of the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan.* P. 24. Available for download at: https://sgma.water.ca.gov/portal/gsp/status.

June 3, 2021, to better understand the parameters of what is required for a GSP to receive approval.

- **Engage underrepresented communities immediately.** As this section acknowledges, underrepresented communities have little or no representation in water management and have often been disproportionately less represented in public policy decision making. It's important to note that their engagement and input around their main concerns must be noted and considered during routine GSA proceedings. Their input should be solicited and received while the GSP formation process is still active.
- **Continually update the GSP and Implementation strategy as best available science evolves.** Meaningful updates to data sources and interpretation should occur at a minimum on a yearly basis, time with the Annual Reports.

Comprehensive River Management

125 Letters of Support

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Braga. 121820
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Bravo. 121820
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Clark. 121820
Fontes. 121820
Gallardo. 121820
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Gonzales. 121820
Gularte. 121820
Hibino. 121820
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Merrill. 121820
Morgan. 121820
Pereira. 121820
Roberts. 121820
Tanimura. 121820
Wiley. 121820
Gill. 121920
Mason. 121920
Myhre. 121920
Almond. 122120
Baillie. 122220
Bengard. 122120
Boutonnet. 122120
De Lorimier. 122120
Harmon. 122120
Hart. 122120
Huss. 122120
Iverson. 122120
Salas. 122120
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Romans. 122920
Borel. 123020
Classen. 123020
McIntyre. 123020
Anecsto. 123120
Latasa. 123120
Rianda. 123120
Rianda. 123120
Transue. 123120
Odello. 010421
Rava. 010421
Soares. 010421
Wayland. 010421
Rava. 010521
Carter. 010621
Rice. 010621
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Scattini. 011021
Secondo. 011121
Alameda. 011221
Gularte. 011221
Orradre. 011221
Tarp. 011221
Marihart. 011321
Marihart. 011421
Giannini. 011521
Gularte. 011521
Bunn. 011721
Hitchcock. 011821
Duflock. 011921
Giudici. 012121
Gularte. 012121
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Wiley. 012121
Pomo. 012221
Pezzini. 012521
Pezzini. 012521

Comprehensive River Maintenance is not part of the Salinas Valley Basin Groundwater Agency's 20-year sub-basin plans. This is a mistake. It must be added.

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STAN BRAGA

printed name

12/17/20

date

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printed name

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12-18-20

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Mercedes Bravo
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December 18, 2020
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Allan Clark
printed name

12/18/20
date

Allan Clark
signature

Fontes Farms
PO Box 3008
Salinas, California 93912-3008
Telephone (831) 424-6151
gefontes@fontesfarms.com

December 18, 2020

Salinas Valley Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA. 93924

RE: Salinas River Maintenance

Board of Directors

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8. Preventative flood control and property damage mitigation.

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George Fontes

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printed name Kelly Gularte - Production Manager

date 12-18-20

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KENT HIBINO
printed name

12/18/2020
date

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Colby Pereira
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GARY TANIMURA
printed name

12/18/20
date

Gary Tanimura
signature

AMERICAN TAKII

American Takii, Inc. 301 Natividad Road Salinas, CA 93906 Phone: 831-443-4901 / FAX 831-443-3976 www.takii.com

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printed name Steve Wiley - GM/COO

date December 18, 2020

signature St R Wiley

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signature Per Huntington Farms

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Kurt Almond 12/21/2020

printed name date

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John Baillie Jack T Baillie Co. Inc

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D'Arrigo Bros

12-21-20

printed name Stephen de Lorimier

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printed name

12/21/2020
date

Kyle Harmon
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Sea Mist Farms

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10855 Ocean Mist Parkway, Suite C ☐ Castroville, California 95012 ☐ Office (831) 633-2144 ☐ Shop (831) 633-3211

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Dec. 23, 2020
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BRIAN BOBIAN
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12-23-2020
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Britt Davis
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Ramon Lara Jr   12-23-2020

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printed name

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Eugene Plaskett
printed name

December 23, 2020
date

Eugene P. Plaskett
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GWEN PLASKETT
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12/23/02
date

Gwen Plaskett
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TRACY PLASKETT
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12-23-20
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[signature]
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Kristine Plaskett

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12-23-20

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K Plaskett

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DARREN RISE

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12-23-2020

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12/23/20
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Terry Sandoval
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Haylie Sainz

printed name

12/24/2020

date

[signature]

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LINDA YIP
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12-25-20
date

Linda Yip
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printed name

12-25-20

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Ryan Yep

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DANNY YOP
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12/25/20
date

Danny Yop
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Kristina Nunes

printed name

12/26/20

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Nicole Knapp — 12/28/2020

printed name — date

Nicole Knapp

signature

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Paul Arnaudo
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12/29/2020
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T. Borel

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Peter Odello

printed name

1-4-21

date

[signature]

signature

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Jerry Rava II
printed name

01-04-2021
date

Jerry Rava II
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Adam Soares

printed name

1/4/2021

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F. WARREN WAYLAND

printed name

1/4/21

date

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JERRY J KAVA Sr

printed name

1-5-2021

date

Jerry J. Kava, Sr.

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Lee Carter — 1/6/21

printed name — date

Lee Carter

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Brad Rice - Salinas Land Company
printed name

1/6/21
date

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Brad Rice - California Orchard Co. 1/6/21

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Brad Rice - Smith - Monterey, LLC

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Gregory M. Scattini
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1/10/21
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printed name

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ANTONE ALAMEDA

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William T. Tarp

printed name

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JOHN R MARCHART
printed name

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John R Marchart
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DAVID MARIHART

printed name

1/14/2021

date

David Marihart

signature

MARIHART FAMILY LLC

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1-15-21
date

Dirk Giannini
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Jynel Gularte

printed name

1/15/2021

date

Jynel Glt

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Christopher Bunn
printed name

1/17/2021
date

signature

Genera Farm investment
Bunn / Yuki ranches

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JEFF HITCHCOCK
printed name

1/18/21
date

J Hitchcock
signature

HITCHCOCK FARMS, INC.
P.O. BOX 2266
SALINAS, CA 93902

January 19, 2019

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Melissa Duflock (property owner along the Salinas river)

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Francis Giudici
printed name Giudici Family Properties

1/21/21
date

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printed name

date 1/21/21

Joel S. Wiley
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Tony Pezzini

printed name

1/25/21

date

signature

Gmail

Emily Gardner <gardnere@svbgsa.org>

Problems with SVBGSA projects

Yahoo Mail <sangjames@yahoo.com> Tue, Jul 20, 2021 at 10:24 AM
Reply-To: Yahoo Mail <sangjames@yahoo.com>
To: [redacted]

Hello All,

Can you forward this email to all sub-basin commitee members and anyone interested in the groundwater sustainability problem? Can you also forward this letter to Landwatch and George Fontes of Salinas Valley Water Coalition?

The problem with the SVBGSA plans is that they are a solution for the sustainability of the entire basin and not for the individual wells. Sustainability means that the goal is make sure that the amount of water being pumped out of the ground is equal or less than the amount of water entering the groundwater in each individual sub basin. But the focus of the plans should be to increase the levels of each farmers well water level, because the minimum threshold and the measurable objective of each well is what will determine whether the SVBGSA or the County of Monterey will determine if they need to take action to close the wells that may be running dry. Even if the SVBGSA meets it's goals of sustainability for the sub-basin, individual wells may be running dry. So the goal should be to raise the well water levels for each well, not to just reach sustainability for each sub-basin.

For example in the Eastside sub-basin, a plan for managed aquifer recharge on individual land owners and a plan for flood plain soaking from the creeks are being planned, but even if this happens, this plan may not have an effect on wells that are a distance away. That means that the well water may not be replenished because the source of infiltrating water will not reach the well water source. Two other plans for groundwater recharge are a diversion at Chualar at a cost of $56,000,000.00 and a diversion at Soledad at a cost of $105,000,000.00. These will divert excess stream water . The problem with these two plans are that they do not have a way to connect this water with the individual wells. They will probably direct the water to a basin, which will connect to an aquifer and not to any particular well. This diversion of water will fill a large area of groundwater but not all wells. You have to realize that each well is at a different area and connected to different water sources. You can determine this because each well has a different minimum threshold and measurable objective. For example monitoring well (14S/03E-06R01) has a MT of -29.7 and a MO of -24.9, while monitoring well {14S/03E-25C02} has a MT of -65.4 and a MO of -42.2. This means that each well has a different water source and cannot probably be replenish by delivering water from a far away infiltrating water basin. The other problem with these diversion plans are that they are dependent on excess stream water before there is allowed any diversion. If there is no excess water, there is no water being redirected! There are two other plans Eastside irrigation Water Supply Project at a cost of ($140,000,000.00) and a Surface Water Diversion from Gabilan Creek at a cost of ($10,000,000.00). Both have the same problem of delivering to the individual well. In the foreseeable drought that we have, I do not see these as reliable sources of water!

The Eastside Sub-basin is the most overdrawn of all the sub-basins. I presented a plan which I believe will solve the delivery of water and the supply of water to the wells at a greatly reduced cost. My plan involves the harvesting of rainwater during the rainy season of Monterey County during the wettest months of December, January and February. The rainy season of Monterey County involves the 5 months of November to March. Our rainfall varies between 5 inches to 30 inches per year. On an average we should be able to get 12 inches per year. In the Eastside Sub-basin their are 34,000 irrigated acres. The sub-basin is short about 10,000 to 20,000 acre feet of water per year. During wet season, when the farmers are not planting crops, they can subsoil plow their land to a depth of 24 to 36 inches. This will have the effect of capturing all the rainfall and prevent the precipitation from evaporating. The deeper the depth of plowing, the less evaporation. It is also important to subsoil plow close to their well, so that there is a better chance of this plowing to refill their well water. So if the farmer will subsoil plow at least 60 percent of their land during the wet season of December to February. They will capture enough rainfall to fill that 20,000 acre feet deficit for the basin. After the wet season is over, the farmer can plow his land normally and use it as he wishes. This strategy should work for any farmland whether you are in the Salinas Valley or the Central Valley. You may want to incentivize this in order to encourage the grower to do this strategy. In the Pajaro Valley, the growers are paid for the collection of rainwater by infiltrating basins. This plan will prevent fallowing of farm land, prevent the buying of farmland, prevent the reduction of economic activity and the lay off of farm workers! I hope this plan is accepted! [ref. You Tube video "Deep Soil Ripping for Water Conservation" by Megan Clayton]

The advantages of subsoil plowing to a depth of at least 24 inches in order to capture rainwater will achieve these goals: It will deliver water close to the individual wells in order to raise well water levels. It will be a yearly constant supply of water. It is cheaper than spending over $500,000,000.00 for all the plans presented to all of the sub-basins. It will incentivize the farmer to subsoil, if Monterey County or SVBGSA will reimburse him for the subsoiling. It may substantially raise the water aquifer levels and groundwater levels. Even all unirrigated lands may also be subsoiled in order to raise aquifer levels.

I want to address another issue. Land Watch presented a plan to stop the drilling of new wells in the deep aquifers. The Advisory Committee voted no and decided to do some more studies. George Fontes who represents the Salinas Valley Water Coalition, a group of growers of 80,000 acres in the Salinas Valley does not want this. I want to present a compromise . I think that we can allow them to drill new wells, but they have to agree to harvesting the rainwater at the method , that I suggested for The Eastside sub-basin. This will help replenish any water that will be pumped out of the deep aquifers.

Thanks to all for reading this!

James Sang sangjames@yahoo.com

Salinas Valley Water Coalition

33 El Camino Real • Greenfield, CA 93927
(831) 674-3783 • FAX (831) 674-3835

TRANSMITTED VIA EMAIL

Salinas Valley Groundwater Sustainability Agency
Board of Directors

12 August, 2021

Dear Board Members;

This letter is submitted on behalf of the Salinas Valley Water Coalition ("Coalition") and is in response to preliminary comments to the Groundwater Sustainability Plans ("GSPs") for the Eastside, Forebay, Langley, Monterey and Upper Valley Subbasins made by members of the public. Said public comments suggest an immediate implementation of the 180/400 Foot Aquifer GSP specific to the proposed Integrated Plan. Should the Salinas Valley Basin Groundwater Sustainability Agency ("SVBGSA") elect to begin implementation of the 180/400 Foot Aquifer GSP, shouldn't the SVBGSA implement *all* of the management actions proposed therein? This recommendation is particularly in light of the existing legal question on whether continuing to pump from sea-water intruded, overdrafted areas is considered reasonable and beneficial use of water.

As to the proposed Integrated Plan, the Coalition has previously stated, and is now again stating, that the SVBGSA does not have the proper tools to develop that plan. The Salinas Valley Integrated Hydrologic Model ("SVIHM") is not only provisional and not available for public vetting, but it has significant calibration issues causing it to be unreliable. Thus, the modeling performed using the SVIHM is not "sufficient to calibrate and reduce [its] uncertainty" (23 CCR §354.18) and is not likely to be properly calibrated for public vetting before these GSPs are due to the Department of Water Resources and thus, cannot be relied upon to make any decision, including taking any regulatory action or for developing the Integrated Plan.

That is, because the results from the SVIHM are provisional and uncertain and are subject to change in future GSP updates after the SVIHM is released by the USGS and unless and until (1) the SVIHM has been made publicly available and publicly vetted; (2) its inputs reflect the current operations of the reservoirs, including the operations of the Salinas Valley Water Project as reflected in its Engineer's Report and the MCWRA water right permits and other water rights; and (3) its calibration results meet industry standard of five percent (5%) to ten percent (10%), the model results cannot be used as basis to develop the Integrated Plan or to determine the flows between subbasins within the Salinas Valley Groundwater Basin because the results are only orders of magnitude approximates and not best available science.

Mission Statement: The water resources of the Salinas River Basin should be managed properly in a manner that promotes fairness and equity to all landowners within the basin. The management of these resources should have a scientific basis, comply with all laws and regulations, and promote the accountability of the governing agencies.

That said, these subbasins have been the subject of many decades of studies and these studies are considered the best available science for reliance by the SVBGSA for inclusion in the GSPs. These studies include the 1988 USGS Water-Resources Investigation Report 87-4066, Simulated Effects of Ground-Water Management Alternatives for the Salinas Valley, California; and the Brown-Caldwell's State of the Salinas River Groundwater Basin Report, dated January 16, 2015. The executive summary of the Brown Caldwell Report and a USGS abstract summary are included as Exhibits A, Exhibit B respectively and the entire reports are included herein by reference and can be found at the following links: **https://www.co.monterey.ca.us/home/showpublisheddocument/61920/636547362391570000** and **https://doi.org/10.3133/wri874066** . Both studies placed "a specific focus on the effect of pumping changes on seawater intrusion" and found that "seawater intrusion could be cut by more than half (from about 18,000 to 8,000 afy) over a 20 year period by decreasing pumping in the Pressure and East Side Subareas by 30%; whereas reducing pumping the Forebay and Upper Valley Subareas had *minimal to no effect on seawater intrusion."* (Emphasis added.) The best available science concludes minimal impacts by Forebay and Upper Valley subbasins on seawater intrusion in the northern subbasin, which must be relied upon by the SVBGSA.

Finally, the Coalition has supported, and continues to support, projects to address the sea water intrusion and overdraft facing the northern subbasins. The Coalition has offered several solutions including using the Monterey County Water Resources Agency ("MCWRA") 11043 permit to develop excess surface water for the Pressure and East Side Subareas. The Coalition also supports the consideration of an extraction barrier in the Pressure Area that could provide an alternate water supply not only to agriculture but also to the urban areas in that subarea. Developing and implementing management actions and a project or projects should be the primary focus rather than more modeling using a known erroneous model that does not fall within SGMA standards.

Thank you for your consideration of the foregoing comments.

Sincerely,

Nancy Isakson, President
Keith Roberts, Chair
Roger Moitoso, Vice- Chair
Rodney Braga, Director
Lawrence Hinkle, Director
Bill Lipe, Director
David Gill, Director
Steve McIntyre, Director
Brad Rice, Director
Jerry Rava, Director
Grant Cremers, Director
Allan Panziera, Director
Michael Griva, Past-Chair

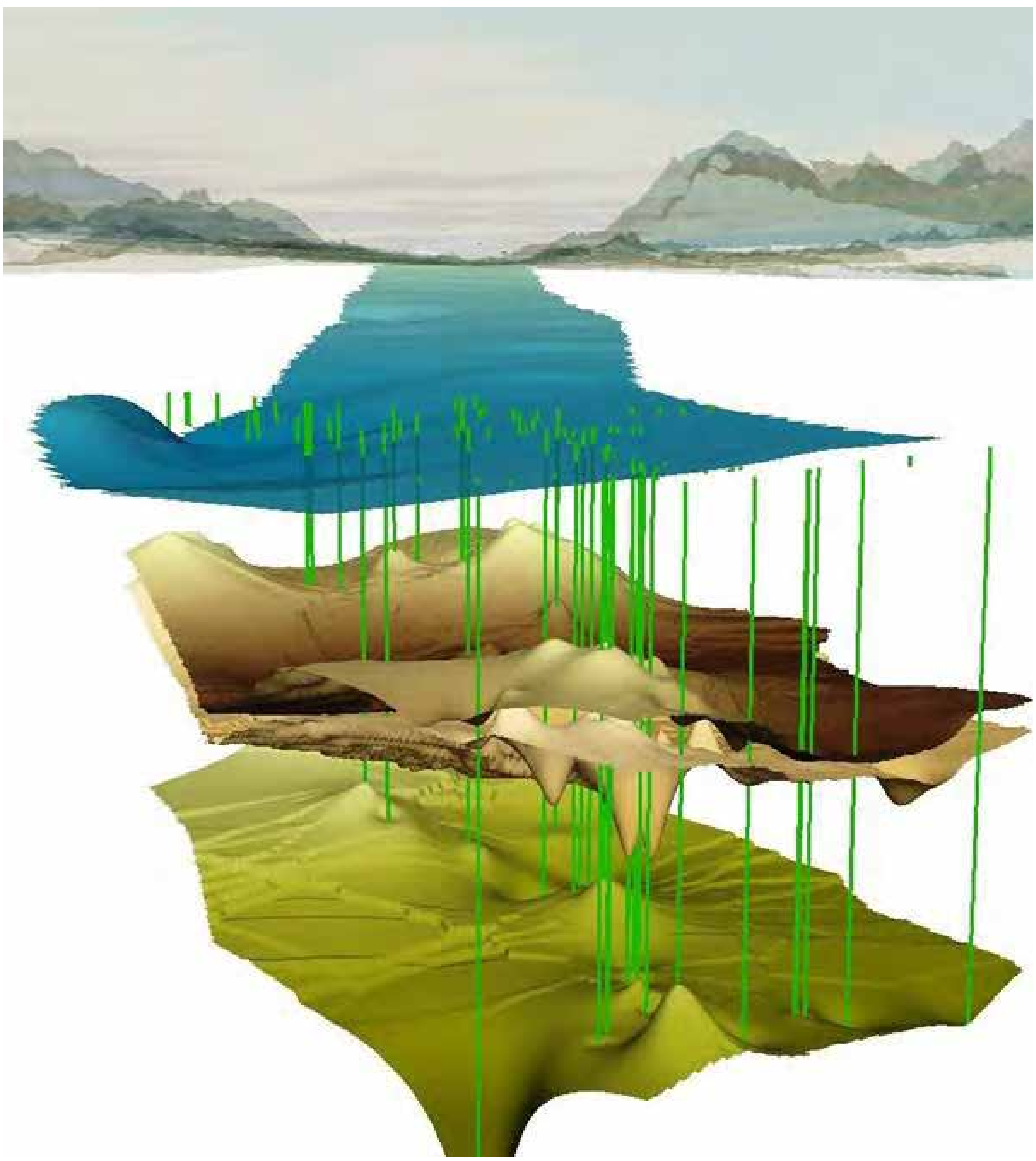
EXHIBIT ‘A’

Brown AND Caldwell

Prepared for Monterey County Resource Management Agency
Salinias, CA

State of the Salinas River Groundwater Basin

January 16, 2015



FINAL

State of the Salinas River Groundwater Basin

Prepared for

Monterey County Resource Management Agency

Salinas, CA

January 26, 2015

FINAL

State of the Salinas River Groundwater Basin

Prepared for

Monterey County Resource Management Agency
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January 26, 2015

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This document was prepared solely for Monterey County Resource Management Agency (County) in accordance with professional standards at the time the services were performed and in accordance with the Professional Services Agreement between the County and Brown and Caldwell. This document is governed by the specific scope of work authorized. We have relied on information or instructions provided by the County, the only intended beneficiary of this work. Except as expressly agreed to between Brown and Caldwell and County, no other party should rely on the information presented herein.

The findings, recommendations, specification, or professional opinions are presented within the limits described by the County, in accordance with generally accepted professional engineering and geologic practice. No warranty is expressed or implied.

Brown AND Caldwell

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Acknowledgements

Brown and Caldwell acknowledges the valuable contributions made by the Monterey County Water Resources Agency (MCWRA) in conducting this near-term assessment of the health and status of Zone 2C of the Salinas River Groundwater Basin.

Specifically, the project team recognizes the following MCWRA technical staff for their efforts:

Howard Franklin	Senior Hydrologist
Peter Kwiek	Hydrologist
German Criollo	Associate Hydrologist
Tamara Voss	Hydrologist
Amy Woodrow	Hydrologist

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Matt Baillie	Principal Hydrogeologist
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Tina Crawford	Geographer
Kim Stubblefield	Project Analyst

Table of Contents

List of Figures

List of Plates

List of Tables

List of Technical Concepts Reviewed in Appendix A

List of Abbreviations

af	acre-feet
afy	acre-feet per year
BC	Brown and Caldwell
Cl	chloride
CSIP	Castroville Seawater Intrusion Project
DWR	California Department of Water Resources
ft/yr	feet per year
gpm	gallons per minute
MCWRA	Monterey County Water Resources Agency
mg/L	milligrams per liter
MSL	mean sea level
MTBE	Methyl Tertiary Butyl Ether
Na	sodium
P-180	Pressure 180-Foot
P-400	Pressure 400-Foot
PERC	perchlorate
SRDF	Salinas River Diversion Facility
SVA	Salinas Valley Aquitard
SVIGSM	Salinas Valley Integrated Groundwater Surface Water Model
SVWP	Salinas Valley Water Project
SWI	seawater intrusion
TCE	trichloroethylene
TDS	total dissolved solids
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VOC	volatile organic compound

Executive Summary

An examination of the state of the Salinas River Groundwater Basin (Basin) was conducted by Brown and Caldwell in the last half of 2014 as part of the larger Basin Investigation requested by the County of Monterey. This State of the Basin Report addresses the ramifications of prolonged drought by considering likely changes in groundwater head elevations, groundwater storage, and seawater intrusion in the event that the current drought continues. In addition, some steps are presented that could be taken to help alleviate the consequences of further depleting groundwater storage.

This study was conducted for Monterey County under County Professional Agreement 14-714, dated 1 July 2014, in response to the Monterey County Board of Supervisors Referral No. 2014.01. The work was carried out with oversight provided by the Monterey County Water Resources Agency (MCWRA).

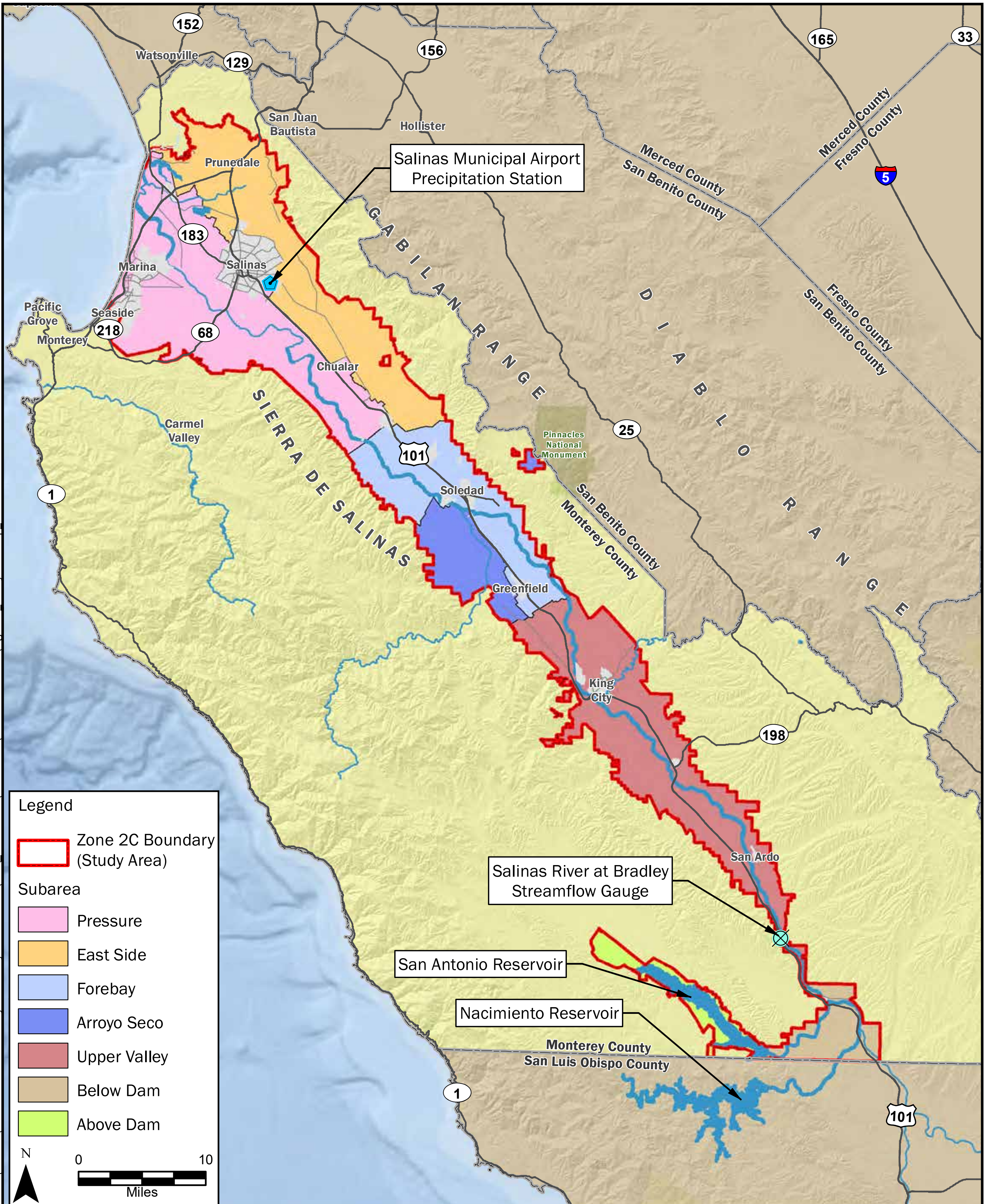
Study Area

The study area for this report is MCWRA Benefit Zone 2C (Zone 2C), which largely straddles the Salinas River within Monterey County (Figure ES-1). Zone 2C consists of 7 subareas named as follows: Above Dam, Below Dam, Upper Valley, Arroyo Seco, Forebay, East Side, and Pressure. The analyses detailed in this report cover the four primary water-producing subareas, the Pressure, East Side, Forebay (including the Arroyo Seco), and Upper Valley Subareas. These four subareas include most of the land area and account for nearly all of the reported groundwater usage within Zone 2C.

The Salinas River Groundwater Basin is the largest coastal groundwater basin in Central California. It lies within the southern Coast Ranges between the San Joaquin Valley and the Pacific Ocean, and is drained by the Salinas River. The valley extends approximately 150 miles from the La Panza Range north-northwest to its mouth at Monterey Bay, draining approximately 5,000 square miles in Monterey and San Luis Obispo Counties. The valley is bounded on the west by the Santa Lucia Range and Sierra de Salinas and on the east by the Gabilan and Diablo Ranges. The Monterey Bay acts as the northwestern boundary of the Basin.

The Salinas Valley has a Mediterranean climate. Summers are generally mild, and winters are cool. Precipitation is almost entirely rain, with approximately 90 percent falling during the six-month period from November to April. Rainfall is highest on the Santa Lucia Range (ranging from 30 to 60 inches per year) and lowest on the valley floor (about 14 inches per year). Very dry years are common and droughts can extend over several years, such as the eight-year drought of Water Years (WY) 1984 to 1991.

Major land uses in the Salinas Valley include agriculture, rangeland, forest, and urban development. Mixed forest and chaparral shrub cover the mountain upland areas surrounding the valley, while the rolling hills are covered with coastal scrub and rangeland. Agricultural and urban land uses are predominant on the valley floor.



DATE	PROJECT	SITE	
01/16/15	146430	**Salinas River Groundwater Basin Investigation**	**Figure ES-1**
Brown AND Caldwell		TITLE: **Study Area Map**	

Historically, irrigated agriculture began with surface water diversions in 1773 on Mission Creek, and diversions from the Salinas River were first recorded in 1797. Groundwater pumping began as early as 1890, and expanded greatly through about 1920 as enabled by several developments such as widespread electrical lines, the development of better well pumps, and the replacement of grain crops with vegetable crops. Groundwater is currently the source of nearly all agricultural and municipal water demands in the Salinas Valley, and agricultural use represents approximately 90 percent of all water used in the Basin. In addition to groundwater, other sources of water for agricultural production include surface water diverted from the Arroyo Seco, recycled municipal waste water supplied by the Monterey County Water Recycling Projects, and surface water diverted from the Salinas River north of Marina as part of the Salinas Valley Water Project.

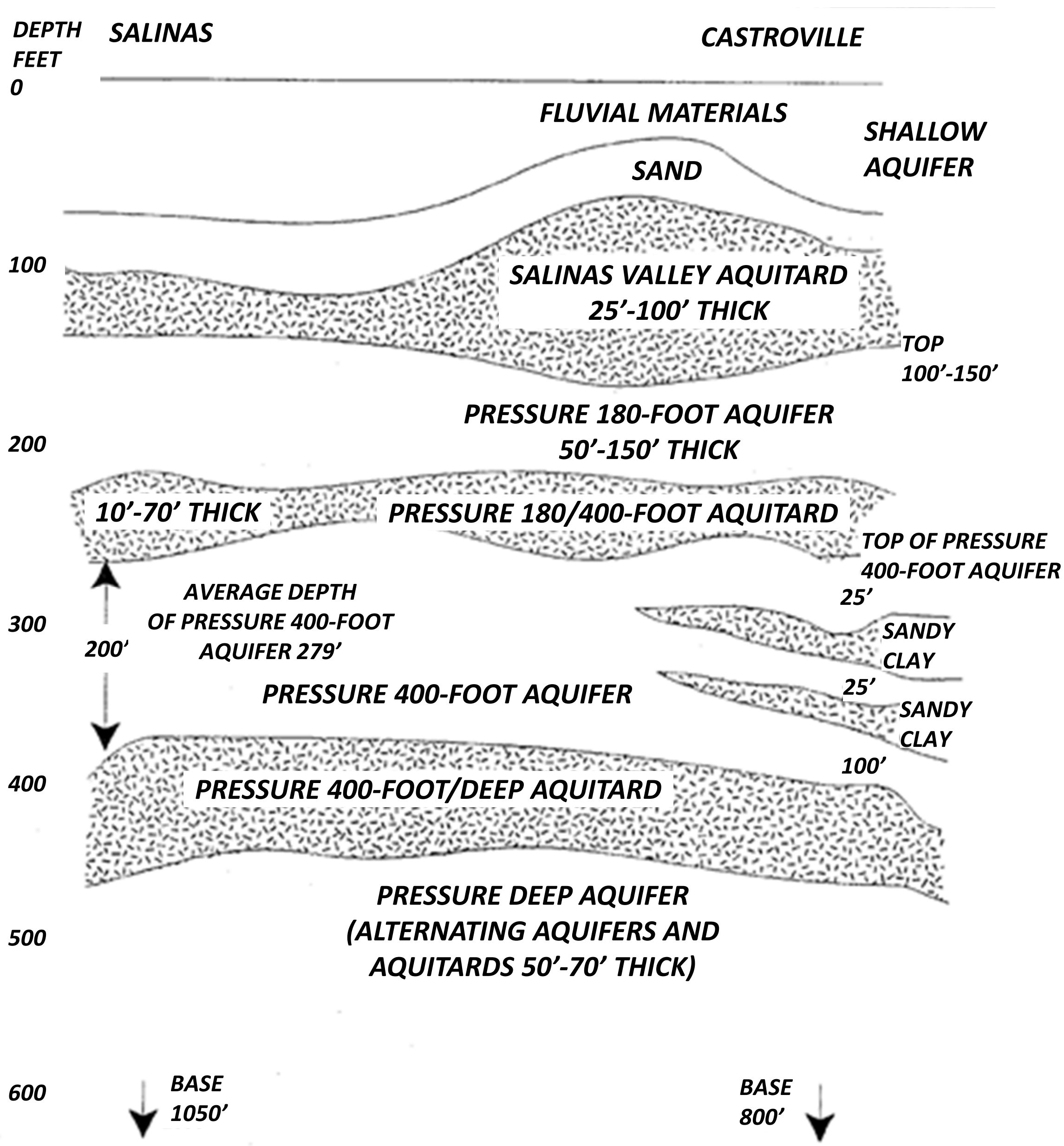
By 1944, groundwater pumping in the entire valley was estimated at about 350,000 acre-feet per year (afy), with about 30 percent of the pumping occurring within the Pressure Subarea, 10 percent in the East Side Subarea, 35 percent in the Forebay Subarea, and 25 percent in the Upper Valley Subarea. Groundwater use in the Salinas Valley peaked in the early 1970's and then started declining, due primarily to changes in crop patterns, continued improvements in irrigation efficiency, and some conversion of agricultural lands to urban land uses.

Seawater intrusion was detected in coastal wells as early as the 1930's, resulting from declining groundwater head elevations in the Pressure and East Side Subareas. Seawater intrusion has continued so that it now reaches as far as 8 miles inland within the Pressure Subarea. The declining head and intruding seawater helped lead to the construction of the Nacimiento and San Antonio Dams (releases beginning in 1957 and 1965, respectively), which are used for flood control, maintenance of groundwater head elevations, multi-year storage, and recreation. Today, as urbanization increases in the valley, alternative sources of urban water supplies and relocation of groundwater pumping are being evaluated and implemented by the Marina Coast Water District and various communities in the northern Salinas Valley.

Hydrogeology

The Salinas Valley Groundwater Basin is a structural basin (i.e., formed by tectonic processes) consisting of up to 10,000 to 15,000 feet of terrigenous and marine sediments overlying a basement of crystalline bedrock. The sediments are a combination of gravels, sands, silts, and clays that are organized into sequences of relatively coarse-grained and fine-grained materials. When layers within these sequences are spatially extensive and continuous, they form aquifers, which are relatively coarse-grained and are able to transmit significant quantities of groundwater to wells, and aquitards, which are relatively fine-grained and act to slow the movement of groundwater. Figure ES-2 is a generalized schematic cross-section across the Pressure Subarea illustrating its general hydrostratigraphy.

Groundwater flow in the Basin is generally down the valley, from the southern end of the Upper Valley Subarea toward Monterey Bay, up to about Chualar (Figure ES-3). North of Chualar, groundwater flows in a north to east direction toward a trough of depressed groundwater head on the northeastern side of Salinas. This trough is especially pronounced in August, the approximate time of the seasonal peak groundwater pumping.



Modified from Hall and Earthware of California, 1992.

Brown AND Caldwell	DATE 01/16/15	SITE Salinas River Groundwater Basin Investigation	Figure ES-2
	PROJECT 146430	TITLE Conceptual Hydrostratigraphic Section in the Pressure Subarea	

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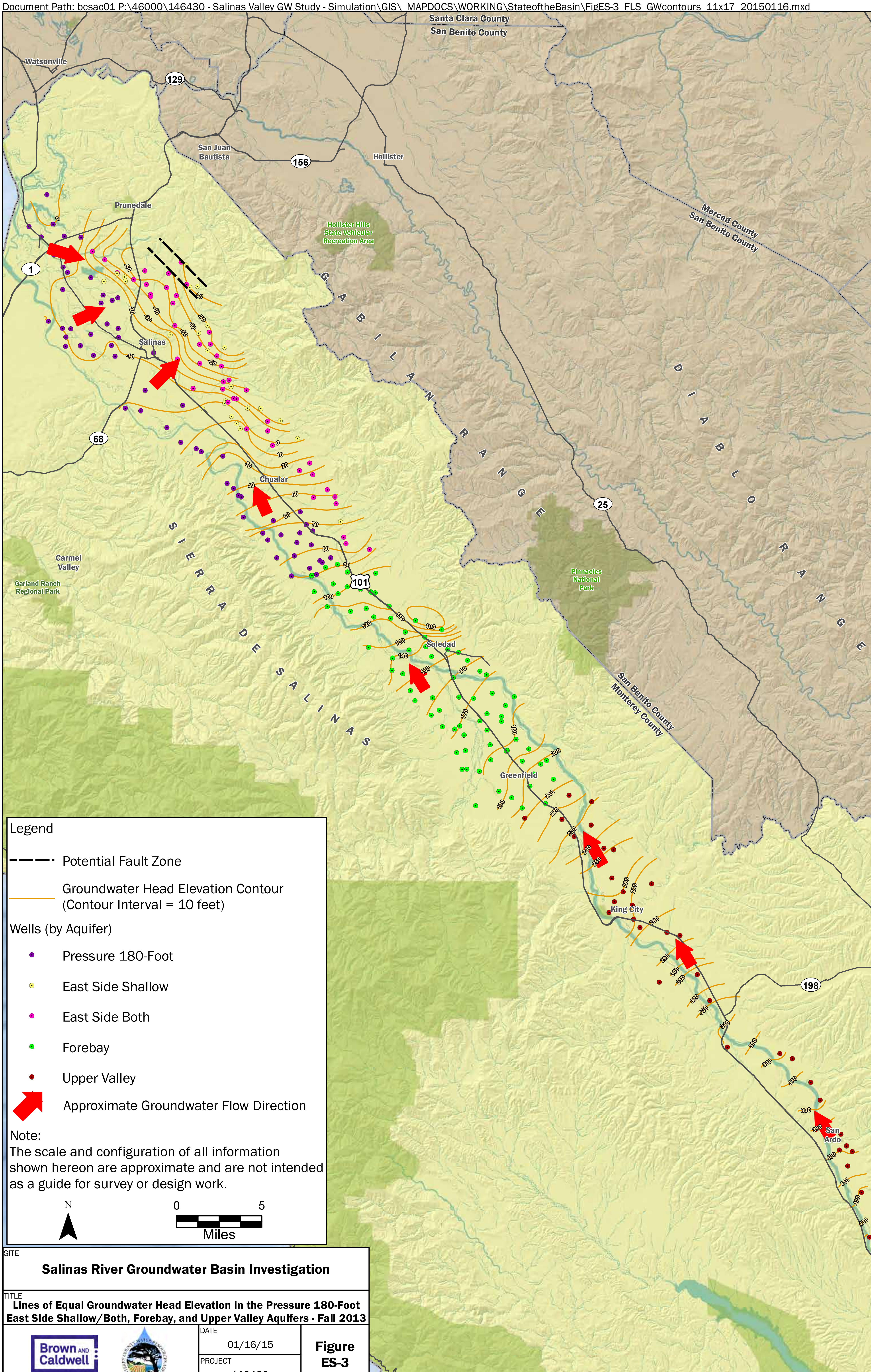


SITE

Salinas River Groundwater Basin Investigation

TITLE

Lines of Equal Groundwater Head Elevation in the Pressure 180-Foot East Side Shallow/Both, Forebay, and Upper Valley Aquifers - Fall 2013

	DATE 01/16/15	**Figure ES-3**
Brown AND Caldwell	PROJECT 146430	

Water Balance

A water balance is a quantitative accounting of the various components of flow entering and leaving a groundwater system. Typical outflows include evapotranspiration, surface runoff that leaves the system, groundwater pumping, and groundwater outflow to a neighboring groundwater system. Typical inflows include recharge from infiltration of precipitation, releases from reservoirs (which receive runoff from precipitation), recharge from leaky aquitards, and groundwater inflow. The difference between inflows and outflows represents the change in groundwater storage. Because precipitation constitutes the major input of water to the Basin, rainfall records from the Salinas Municipal Airport gauge from 1873 to the present were analyzed. Based on the mean precipitation of 13.4 inches and standard deviation of 4.8 inches, each year's precipitation total was assigned to one of seven, "wetness levels," as follows: Extremely Dry, Very Dry, Dry, Normal, Wet, Very Wet, or Extremely Wet. In general, dry years are more common than wet years, but Extremely Dry years are less common than Extremely Wet years. The drought period from WY 1984 to 1991 included three Very Dry years, four Dry years, and one Normal year; this period was used in this study as a comparative period for predicting future changes in groundwater head and storage. Based on provisional data, the WY 2014 precipitation of about 5.9 inches represents a Very Dry year and the third-driest water year on record. The current drought of WY 2012 to 2014 includes two Dry years and one Very Dry year; over this three-year period, the total rainfall was about 15 inches below the period of record average.

This study emphasizes the importance of cumulative precipitation surplus, which quantifies precipitation on timescales longer than a year to examine the impacts of multi-year dry and wet periods. The cumulative precipitation surplus reached a high of about 41 inches at the end of WY 1958, and declined to zero by the end of WY 2013. During the extended drought from WY 1984 to 1991, the cumulative precipitation surplus declined by about 36 inches, an average of about 4.5 inches per year. The major declines in cumulative precipitation surplus had and continue to have negative effects on groundwater storage in Basin aquifers (see Storage Change discussion below). Figure ES-4 shows a time series of annual and cumulative precipitation surplus.

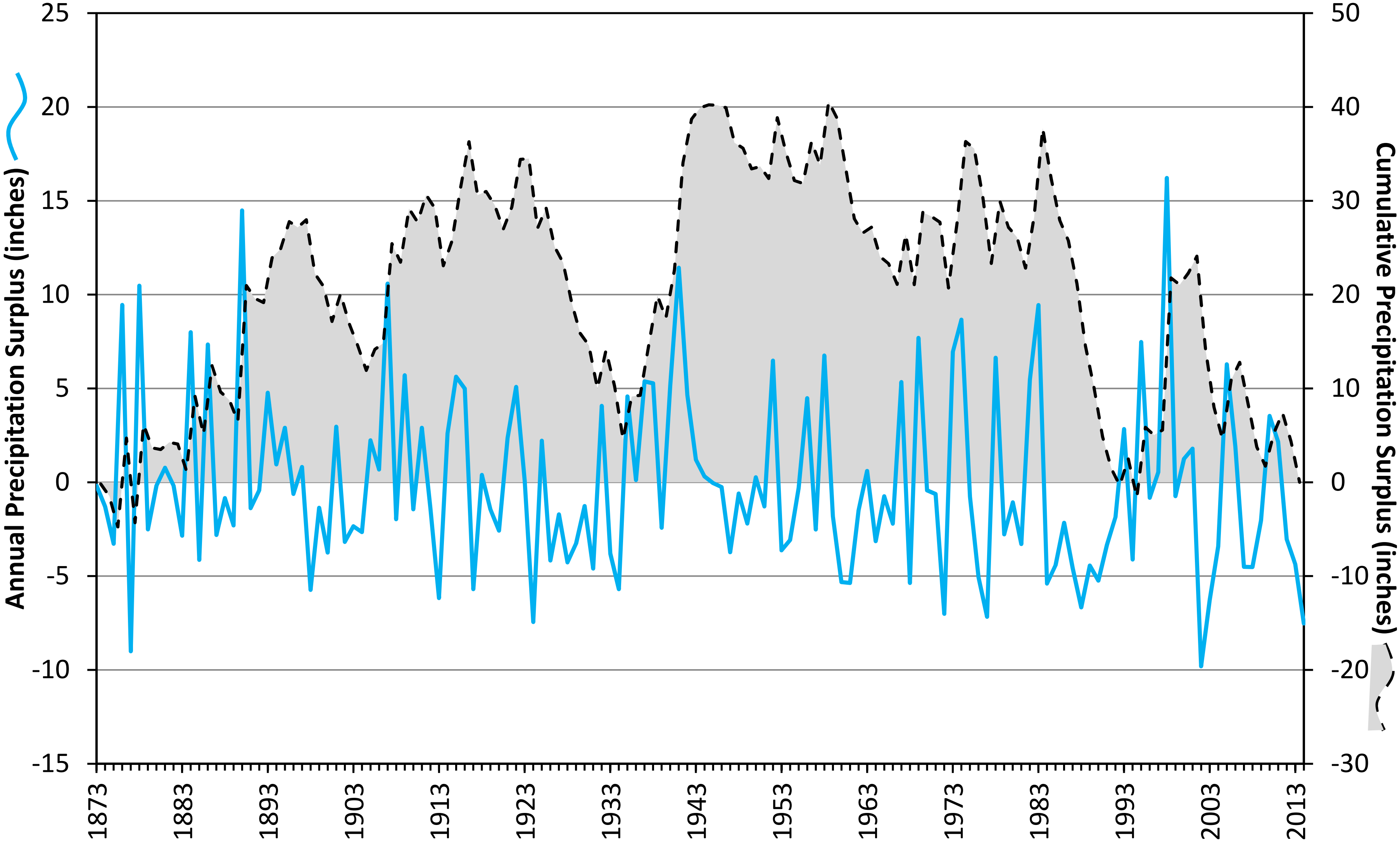
Inflows

Out of an estimated total of about 504,000 afy of inflow to the Basin, about 50 percent occurs as stream recharge, 44 percent occurs as deep percolation from agricultural return flows and precipitation, and 6 percent occurs as subsurface inflow from adjacent groundwater basins (MW, 1998). Table ES-1 summarizes the inflow components of the water budget, as reported by MW (1998).

Table ES-1. Water Budget Components by Subarea

Subarea	Average of WY 1958-1994 (from MW, 1998)				2013 Groundwater Pumping (reported by MCWRA)[c]
	Inflow		Outflow		
	Natural Recharge[a]	Subsurface Inflow	Groundwater Pumping[b]	Subsurface Outflow	
Pressure	117,000	17,000	130,000	8,000	118,000
East Side	41,000	17,000	86,000	0	98,000
Forebay	154,000	31,000	160,000	20,000	148,000
Upper Valley	165,000	7,000	153,000	17,000	145,000

Note: All estimates in acre-feet per year (afy).
[a] Includes agricultural return flow, stream recharge, and precipitation.
[b] Groundwater pumping as reported by MW (1998) is presented to provide a complete water budget.
[c] The 2013 groundwater pumping totals are provided for comparison.



Note: The annual precipitation surplus represents the difference between the annual precipitation and the long-term mean.

Brown AND Caldwell	DATE 01/16/15	SITE Salinas River Groundwater Basin Investigation	Figure ES-4
	PROJECT 146430	TITLE Annual and Cumulative Precipitation Surplus at Salinas Municipal Airport	

Within the Pressure Subarea, inflow is largely made up of subsurface inflow from the Forebay Subarea; prior to development, additional subsurface inflow occurred from the East Side Subarea, but this flow had been reversed by declining groundwater head elevations in the East Side Subarea. An additional inflow to the Pressure Subarea is seawater intrusion, which could account for between about 11,000 and 18,000 afy.

Inflow to the East Side Subarea is made up of a combination of infiltration along the small streams on the west side of the Gabilan Range, direct recharge of precipitation on the valley floor, and subsurface inflow from the Pressure and Forebay Subareas.

Inflow to the Forebay Subarea is made up of infiltration along Arroyo Seco, Reliz Creek, and the Salinas River as well as agricultural return flow, direct recharge of precipitation on the valley floor, subsurface inflow from the Upper Valley Subarea, and mountain front recharge along the eastern and western Subarea boundaries.

Inflow to the Upper Valley Subarea is made up of infiltration along the Salinas River and its tributaries, with lesser amounts entering the subarea via direct recharge of precipitation on the valley floor and agricultural return flow, plus minor quantities entering via subsurface inflow from the Panch Rico Formation to the east and along drainages tributary to the Salinas River.

Outflows

Groundwater pumping is, by far, the largest component of outflow from the Basin. Of an estimated total of 555,000 afy of outflow, about 90 percent is groundwater pumping, with the remainder occurring as evapotranspiration along riparian corridors (Ferriz, 2001). Table ES-1 summarizes the outflow components of the water budget, as reported by MW (1998).

In general, groundwater pumping in the study area increased over the first 14 years of the available period of record (1949 to 2013), from about 380,000 afy in 1949 to about 620,000 afy in 1962, the highest pumping year on record. Pumping began to decline after about 1972, when pumping was about 530,000 afy, and fell to about 430,000 afy by 1982 before averaging about 500,000 afy over the rest of the period of record. Reported pumping for 2013 totaled about 509,000, acre-feet (af).

While annual pumping totals were relatively steady in the Pressure and East Side Subareas after about 1962, pumping in the Forebay and Upper Valley Subareas continued to increase until the early 1970's, then decreased slightly through the mid-1980's. On average, from 1949 to 2013, about 25 percent of basinwide pumping occurred in the Pressure Subarea, 17 percent in the East Side Subarea, 30 percent in the Forebay Subarea, and 28 percent in the Upper Valley Subarea.

Within the Pressure Subarea, outflow occurs as a combination of groundwater pumping and subsurface outflow to the East Side Subarea. In the East Side Subarea, outflow is made up entirely of groundwater pumping, since the reversal of the groundwater head gradient curtailed the natural subsurface outflow to the Pressure Subarea. In the Forebay Subarea, outflow is dominated by groundwater pumping, with a small amount of subsurface outflow to the Pressure and East Side Subareas. Outflow from the Upper Valley Subarea is largely made up of groundwater pumping, with a small amount of subsurface outflow to the Forebay Subarea.

Groundwater Storage

Estimated Basin groundwater storage is summarized in Table ES-2. The reported total stored volume of groundwater in the Basin is about 16.4 million af, and the reported aquifer storage capacity is approximately 19.8 million af (DWR, 2003). These values suggest that there is an unfilled storage capacity of about 3.3 million af.

Storage Change

The estimation of groundwater storage changes in the Basin calculated for this project is a measure of aquifer response to the natural hydrologic cycle (e.g. precipitation) and human-induced effects (e.g. pumping). The analysis of storage change was accomplished by considering subarea-averaged annual groundwater head elevation changes reported by MCWRA from 1944 to 2013. The accuracy of this analysis relies directly on the accuracy of the estimates of head change and of the values of storage coefficient and land area used. For this analysis, the storage coefficients reported by DWR (2003) were used[1]. Figure ES-5 shows a time series of calculated storage change for the Basin, color-coded by subarea. When compared with Figure ES-4, it is clear that there is a strong correlation between the pattern of the cumulative precipitation surplus and that of storage change. The storage change analysis included a statistical comparison between subarea storage change and annual precipitation surplus, reservoir releases, streamflow (at the Salinas River gauge near Bradley), and groundwater pumping. In all four subareas, annual storage change was correlated most strongly to annual precipitation surplus. The results of the storage change analysis are summarized in Table ES-3.

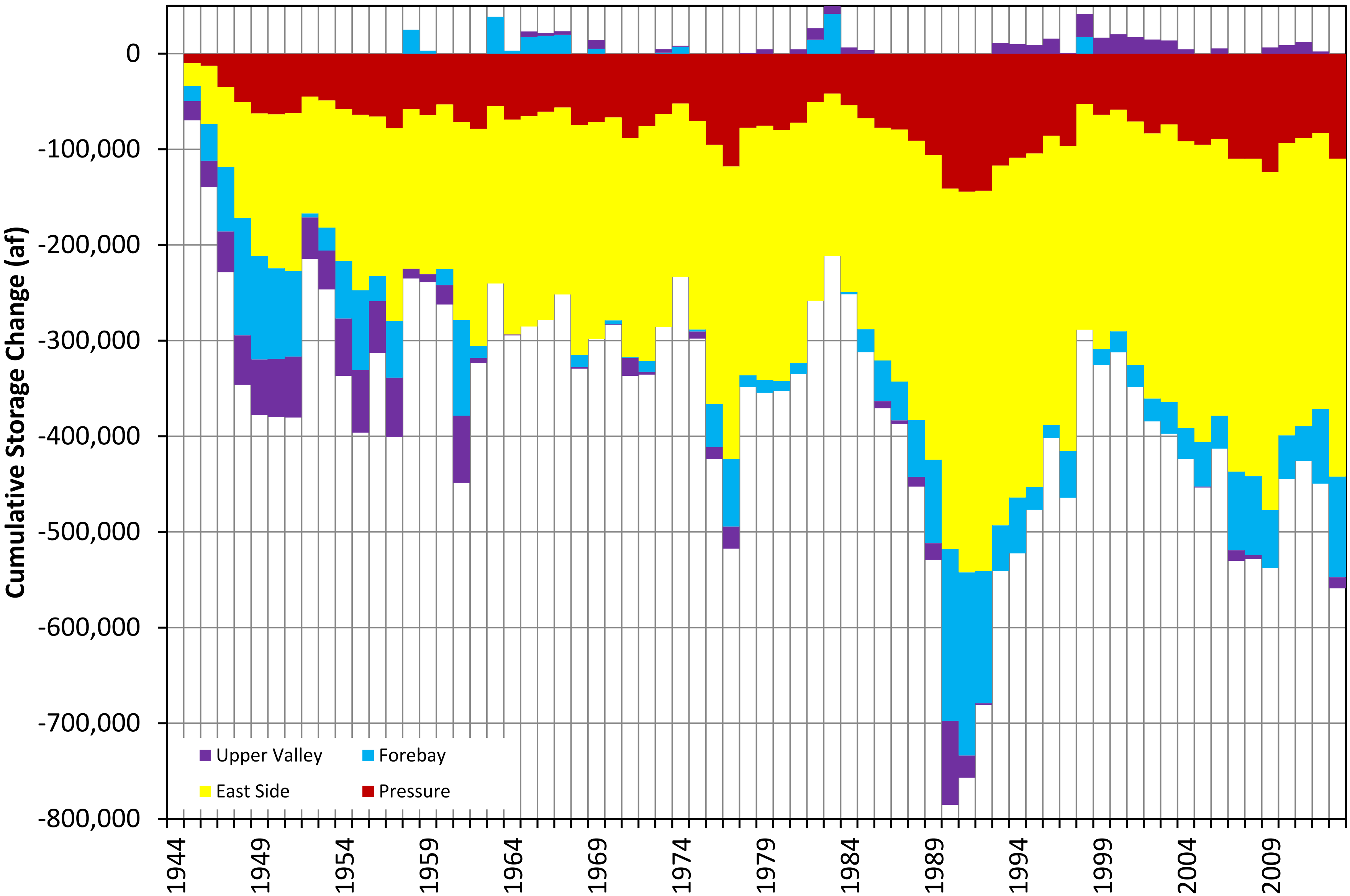
Table ES-2. Groundwater Storage

Subarea	Storage Coefficient (ft^3/ft^3)[a]	Land Area (acres)[b]	Storage Capacity (acre-feet)[a]	Groundwater in Storage (acre-feet)[a]	Available Storage (acre-feet)
Pressure	0.036	126,000	7,240,000	6,860,000	380,000
East Side	0.08	75,000	3,690,000	2,560,000	1,130,000
Forebay	0.12	87,000	5,720,000	4,530,000	1,190,000
Upper Valley	0.10	92,000	3,100,000	2,460,000	640,000
Total	--	380,000	19,750,000	16,410,000	3,340,000

[a] *From DWR (2003).*

[b] *From the Salinas Valley Integrated Ground and Surface Water Model (SVIGSM).*

1 The storage calculation presented in this Executive Summary is based on the storage coefficients published in DWR (2003). In the main body of the Report, the storage calculation is based on the DWR (2003) data and an additional and smaller storage coefficient that could be representative of the confined portions of the Pressure Subarea aquifer system.



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Brown AND Caldwell	DATE 01/16/15	SITE Salinas River Groundwater Basin Investigation	Figure ES-5
	PROJECT 146430	TITLE Cumulative Storage Change by Subarea	

Table ES-3. Calculated Storage1 Change by Subarea, 1944 to 2013						
Subarea	Minimum Annual (af)	Maximum Annual (af)	Annual Average (afy)	Minimum Cumulative (af)	2013 Cumulative (af)	Predicted Change If Drought Continues (afy)
Pressure	-35,000	+44,000	-2,000	-144,000 (1991)	-110,000	-10,000 to -20,000
East Side	-58,000	+83,000	-5,000	-398,000 (1991)	-333,000	-25,000 to -35,000
Forebay[a]	-93,000	+98,000	-2,000	-192,000 (1991)	-105,000	-10,000 to -15,000
Forebay[a]	-93,000	+98,000	-2,000	-192,000 (1991)	-105,000	-80,000 to -90,000
Upper Valley[a]	-70,000	+65,000	-200	-88,000 (1990)	-12,000	-5,000 to -15,000
Upper Valley[b]	-70,000	+65,000	-200	-88,000 (1990)	-12,000	-50,000 to -70,000
Zone 2C[a]	-256,000	+217,000	-8,000	-786,000 (1990)	-559,000	-50,000 to -85,000
Zone 2C[b]	-256,000	+217,000	-8,000	-786,000 (1990)	-559,000	-165,000 to -215,000

Note: af = acre-feet; afy = acre-feet per year

[a] Based on calculated storage changes over the extended drought of WY 1984 to 1991

[b] Based on calculated storage changes for years with very low reservoir release (WYs 1961 and 1990)

Pressure Subarea

Using the storage coefficient value of 0.036, as reported by DWR (2003), calculated storage change in the Pressure Subarea from 1944 to 2013 was about -110,000 af, averaging about -2,000 afy. Based on storage changes during the extended drought of WY 1984 to 1991, storage in the Pressure Subarea could be expected to decline by about 10,000 to 20,000 afy under continued dry conditions.

East Side Subarea

Calculated storage change in the East Side Subarea from 1944 to 2013 was about -333,000 af, averaging about -5,000 afy. Based on storage changes during the extended drought of WY 1984 to 1991, storage in the East Side Subarea could be expected to decline by about 25,000 to 35,000 afy under continued dry conditions.

Forebay Subarea

Calculated storage change in the Forebay Subarea from 1944 to 2013 was about -105,000 af, averaging about -2,000 afy. The pattern of storage change in the Forebay Subarea is quite dissimilar to that in the Pressure and East Side Subareas, being much closer to zero storage change over much of the period of record and appearing to be strongly affected by years of very low reservoir releases, which lead to very large storage declines in this Subarea. Based on storage changes during the extended drought of WY 1984 to 1991, storage in the Forebay Subarea could be expected to decline by about 10,000 to 15,000 afy under continued drought conditions. However, if reservoir releases are severely curtailed (as occurred in WYs 1961 and 1990), storage changes may be much greater in magnitude, on the order of 80,000 to 90,000 afy, or about 50 to 60 percent of annual pumping in the Forebay Subarea.

Upper Valley Subarea

Calculated storage change in the Upper Valley Subarea from 1944 to 2013 was about -12,000 af, averaging about -200 afy. The pattern of storage change is similar to that of the Forebay Subarea, with a similar apparent reliance on reservoir releases. Based on storage changes during the extended drought of WY 1984 to 1991, storage in the Upper Valley Subarea could be expected to decline by about 5,000 to 15,000 afy under continued drought conditions. However, if reservoir releases are severely curtailed, storage losses may be much larger, on the order of about 50,000 to 70,000 afy, or about 30 to 50 percent of annual pumping in the Upper Valley Subarea.

Zone 2C

Based on the numbers presented above, calculated storage change from 1944 to 2013 in all of Zone 2C was about -559,000 af, averaging about -8,000 afy. The pattern of storage change follows the pattern of the precipitation surplus, but is also affected by reservoir releases, which typically replenish approximately 35 percent of annual pumping as aquifer recharge. During years of exceptionally low reservoir releases, such as 1991, drought-related aquifer storage depletion is amplified.

Storage under continued dry conditions can be expected to decline by about 50,000 to 85,000 afy, comparable to past dry years. However, if reservoir releases are severely curtailed, as occurred in WYs 1961 and 1990, storage losses could be expected to be much larger, on the order of about 165,000 to 215,000 afy.

Over the period from 1959 to 2013 (the period for which groundwater pumping data are available and the reservoirs have been operating), the average reported annual pumping in Zone 2C was about 523,000 afy. During this same time period, the average annual storage change (calculated using groundwater head changes) was about -6,000 afy. An additional loss of storage due to seawater intrusion has occurred, and has been estimated at between 11,000 and 18,000 afy. This suggests that, overall, Zone 2C is out of groundwater balance by about 17,000 to 24,000 afy. The total calculated storage change over this period (not including seawater intrusion) was about -349,000 af, about 50 percent more than the storage change experienced prior to the beginning of operations of the reservoirs (about -210,000 af from 1944 to 1958), indicating that the reservoirs have greatly slowed storage losses in the Basin. However, the existing storage deficit has continued to grow over the period of record, and must be remedied before the deleterious effects of storage declines, such as seawater intrusion and the drying of wells, can be reversed. In addition, the volume of storage lost due to seawater intrusion must be better quantified.

State of the Basin – Water Supply in Zone 2C

Based on the calculations conducted for this project as discussed above, the Basin is currently out of hydrologic balance by approximately 17,000 to 24,000 afy. However, the estimated volume of groundwater in reserve (i.e. storage) is about 6.8 million acre-feet in the aquifers of the Pressure Subarea (Table ES-2), and the total volume of groundwater stored in Zone 2C is about 16.4 million acre-feet.

The goal of the water supply analyses presented in this report was to provide a postulation of how groundwater supply may change in the future should the current drought conditions continue. This was accomplished by assessing how and why groundwater head elevations and groundwater storage have changed in the past. Independent hydrologic variables (precipitation, groundwater pumping, reservoir releases, and streamflow) were compared with the groundwater head and storage changes to provide insight (or correlations) into which of these factors is driving these changes. Lastly, this study then provides professional opinions on the consequences of using more groundwater than the estimated yield on both the short-term Basin conditions and long-term sustainability.

An analysis of historical groundwater head elevation at a selected set of 25 locations indicated that, overall, groundwater head changes are correlated most strongly to the annual precipitation surplus in the Pressure, East Side, and Forebay Subareas. Head changes in the Upper Valley Subarea are not well-correlated to any independent variable, whereas the storage changes discussed above are statistically correlated to annual precipitation surplus.

Based on statistical correlations and comparison with the extended drought from WY 1984 to WY 1991, representative head changes at the Subarea scale could range from:

- -5.3 to -1.1 feet per year in the Pressure Subarea (for all three aquifers),
- -9.6 to -3.0 feet per year in the East Side Subarea,
- -5.6 to -1.8 feet per year in the Forebay Subarea, and
- -2.0 to +0.2 feet per year[2] in the Upper Valley Subarea.

Storage changes are also strongly affected by the occurrence of very low reservoir releases, which have historically resulted in storage declines. The cumulative storage loss over the period from 1944 to 2013, not including storage volume lost to seawater intrusion, was about 559,000 af for all of Zone 2C. About 40 percent of the storage loss occurred in the 14 years before Nacimiento Reservoir began releasing water, while about 60 percent occurred over the 55 years from 1959 to 2013. Estimates of storage decline in future dry years range from about 50,000 to 215,000 afy (Table ES-3), depending on the level of reservoir releases that occur. This storage loss, added to the existing storage deficit built up over the history of groundwater development in the study area, will exacerbate the problem of seawater intrusion in the Pressure Subarea.

State of the Basin – Seawater Intrusion

The water quality analysis in this study was undertaken to determine the extent of seawater intrusion into the coastal aquifers in 2013 and to analyze how it is likely to evolve in the future, should the current dry conditions continue into the coming years. The extent of seawater intrusion into the Pressure 180-Foot and Pressure 400-Foot Aquifers (Figures ES-6 and ES-7, respectively) in 2013 was not different from the extents mapped in 2011, indicating that the first two years of current drought did not have an apparent effect on the movement of the seawater intrusion front.

In assessing other markers of seawater intrusion, the sodium to chloride (Na/Cl) ratios[3] indicate that numerous wells on the landward side of the seawater intrusion front have likely been affected by seawater intrusion, even though the chloride concentration has not increased to the 500 mg/L level used by MCWRA to delineate seawater intrusion. Wells screened in the Pressure 400-Foot Aquifer that are several miles landward of the mapped seawater intrusion extent may have been impacted by seawater intrusion in the past. The landward seawater mixing with deeper groundwater can possibly be attributed to the vertical movement of groundwater from the Pressure 180-Foot Aquifer into the lower Pressure 400-Foot zone. Possible mechanisms include: a) natural leakage through areas of thin or absent aquitard between the two aquifers, b) via wells screened across both aquifers, and c) along faulty or compromised well casings acting as conduits.

The accelerated rate of seawater intrusion in 1984 can be attributed to the seven-year drought that started in 1984, the extent of which is depicted in Figures ES-6 and ES-7. The apparent rate of seawater intrusion in the period peaked from 1997 to 1999, despite the fact that the groundwater head elevations began to recover before this time from the declines experienced during the WY 1984 to 1991 drought. If this latent response to an extended drought is repeated in the Basin, water quality impacts stemming from the current drought may not manifest for several years. Chloride concentrations in affected wells increased by up to 100 mg/L from the beginning of the extended drought to 1999, and similar concentration changes may be expected in wells near the seawater intrusion front over the coming years.

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2 Positive head changes in individual wells are reflective of increases in head that occurred in select wells during the WY 1984 to 1991 drought, and are not reflective of the average head change in the Upper Valley Subarea during the same period. It is considered unlikely that continued drought conditions will result in an overall increase in head in the Upper Valley Subarea, although individual wells may see head increases, depending on local conditions.

3 Calculated from historical water quality data at selected monitoring wells

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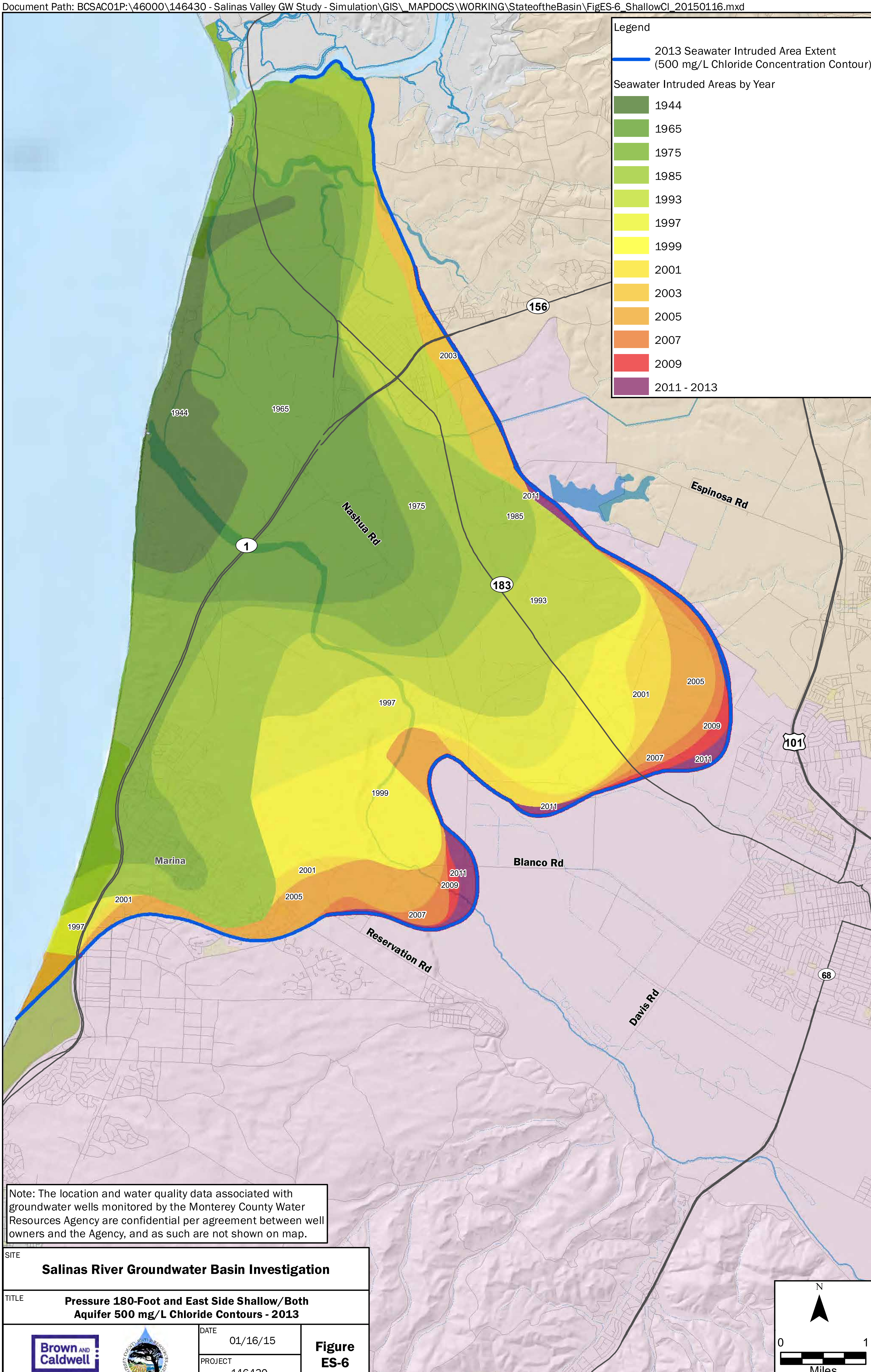
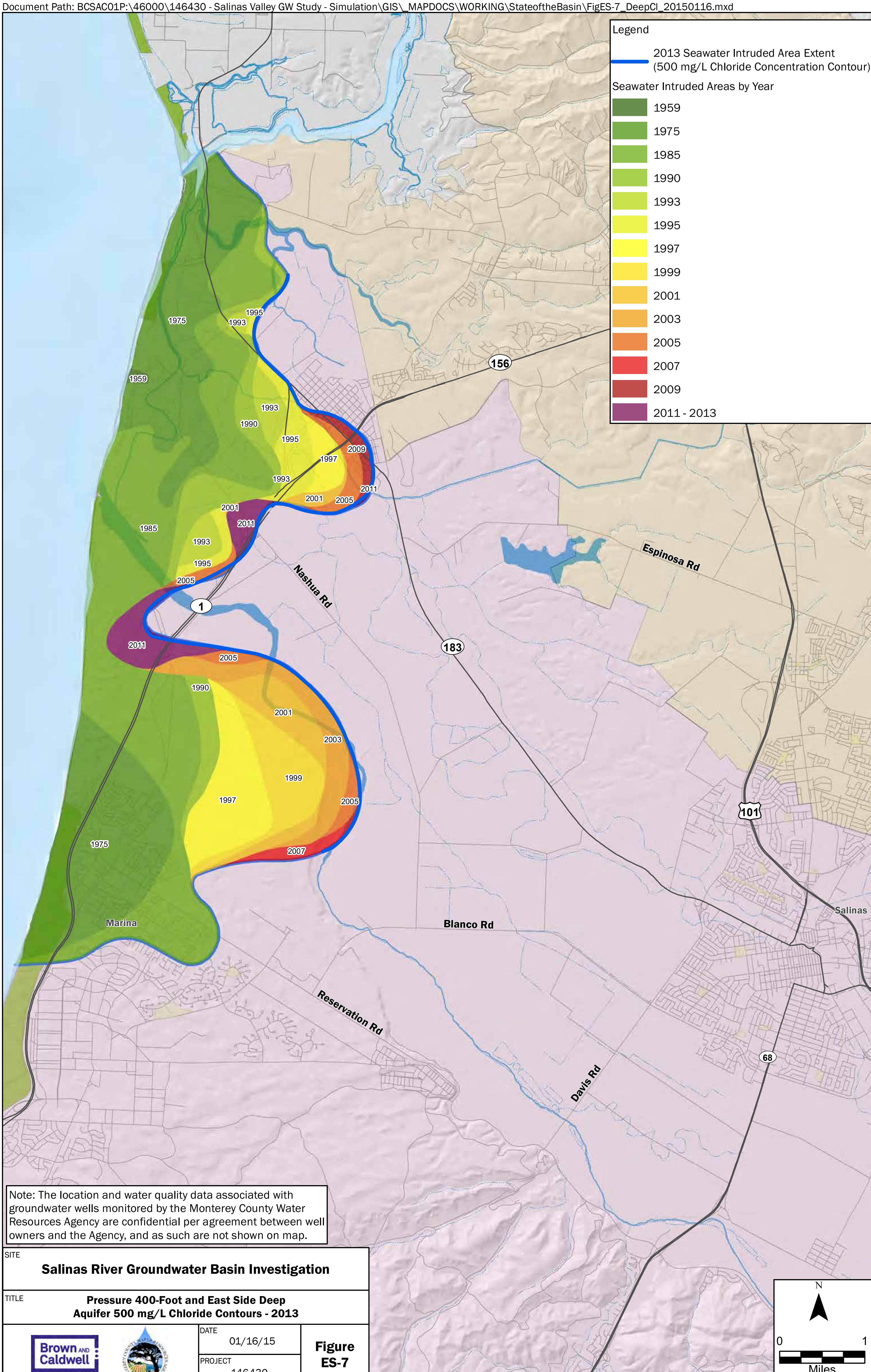


Note: The location and water quality data associated with groundwater wells monitored by the Monterey County Water Resources Agency are confidential per agreement between well owners and the Agency, and as such are not shown on map.

SITE **Salinas River Groundwater Basin Investigation**		
TITLE **Pressure 180-Foot and East Side Shallow/Both Aquifer 500 mg/L Chloride Contours - 2013**		
Brown AND Caldwell	DATE 01/16/15 PROJECT 146430	**Figure ES-6**



Note: The location and water quality data associated with groundwater wells monitored by the Monterey County Water Resources Agency are confidential per agreement between well owners and the Agency, and as such are not shown on map.

SITE
Salinas River Groundwater Basin Investigation

TITLE
Pressure 400-Foot and East Side Deep Aquifer 500 mg/L Chloride Contours - 2013

Brown AND Caldwell

DATE 01/16/15

PROJECT 146430

Figure ES-7

Options to Address Water Supply under Continued Drought Conditions

Based on the analyses discussed above, the Basin appears to be out of hydrologic balance. The average annual groundwater extraction for the four primary water-producing subareas that compose Zone 2C was about 523,000 afy from 1959 to 2013. The average annual change in storage was about -17,000 to -24,000 afy, including seawater intrusion. This implies that the yield for Zone 2C is on the order of about 501,000 to 508,000 afy; the deficit is essentially the storage change (loss) stated above. It is important to note that the Basin does have an estimated volume of groundwater in storage of about 16 million af (Table ES-2), which could represent a significant groundwater reserve – as compared to the current estimated storage loss of 17,000 to 24,000 afy – and could be used to offset temporary overdraft conditions in the future.

Based on the continued large storage declines in the East Side and Pressure Subareas (and resulting groundwater head declines and seawater intrusion), the current distribution of groundwater extractions is not sustainable. Seawater intrusion can account for up to 18,000 afy of the total storage loss of 24,000 afy. Sustainable use of groundwater can only be achieved by aggressive and cooperative water resources planning to mitigate seawater intrusion and groundwater head declines.

The consequences of no-action under continued drought conditions will be the imminent advancement of seawater intrusion within the next few years and the continued decline of groundwater head. Both of these conditions would necessitate the drilling of deeper groundwater wells to produce the quantity and quality of water needed for consumptive use and irrigation. The installation of deeper wells may not be feasible in some areas because of lower groundwater yield and water quality in the Pressure Deep Aquifer. A more sustainable and long term management practice would encourage a Basin-wide redistribution and reduction of groundwater pumping, which would require cooperative and aggressive resource management. The unsustainability of the current distribution of groundwater extractions has long been recognized by various investigators, and Basin-wide redistribution and reduction of pumping have been recommended previously (e.g. DWR, 1946).

Technical Option 1

The large storage declines that have occurred in the Basin in the past, especially in the East Side Subarea, have created a significant landward groundwater head gradient that must be reversed before seawater intrusion can be halted. Reduction of pumping in the Pressure and East Side Subareas could help mitigate some of the anticipated effects of extended drought on groundwater storage and water quality in the study area. Shifting of pumping to areas farther away from the coast would also be helpful, as long as it is shifted south of the current head trough (Figure ES-3) that exists in the East Side Subarea. While not currently consistent with County Policy, shifting pumping to areas that are both south of the seawater intrusion zone and hydraulically connected to the Salinas River does represent a physical option for addressing seawater intrusion.

DWR (1946) recommended that pumping be curtailed in the Pressure and East Side Subareas and substituted with extraction in the Forebay and Upper Valley Subareas, which are strongly connected to (and interact with) the Salinas River. Yates (1988) performed a numerical modeling analysis of the Basin, with a specific focus on the effect of pumping changes on seawater intrusion, and calculated that seawater intrusion could be cut by more than half (from about 18,000 to 8,000 afy) over a 20-year period by decreasing pumping in the Pressure and East Side Subareas by 30 percent[4]; whereas, reducing pumping in the Forebay and Upper Valley Subareas had minimal to no effect on seawater intrusion.

[4] Note that Yates (1988) assumed an agricultural pumping rate of 512,200 afy, based on the results of a land use survey performed in the Salinas Valley in 1976. Recent pumping rates are slightly lower (around 500,000 afy), in part due to the operation of the Monterey County Water Recycling Projects.

Technical Option 2

The shifting of some pumping from the Pressure 180-Foot and Pressure 400-Foot Aquifers to the Pressure Deep Aquifer would reduce the storage deficit in the shallower aquifers; however, this would necessarily lead to head declines in the Pressure Deep Aquifer. Unlike the Pressure 180-Foot and Pressure 400-Foot Aquifers, it is uncertain if the Pressure Deep Aquifer is hydraulically connected to the ocean in Monterey Bay, so it is not known whether this pumping shift would lead to the onset of seawater intrusion into the Pressure Deep Aquifer. Also unknown is the likelihood of localized interaquifer seawater mixing between the Pressure 400-Foot Aquifer and the Pressure Deep Aquifer. Hence, this Management Option requires more investigation to determine its feasibility.

Evaluation of Potential Solutions

The numerical modeling analysis to be performed as the second part of this Basin Investigation will consider the effects of various management decisions on the water supply and water quality in the study area. The primary questions to be assessed for each scenario are: 1) what will be the rate of groundwater head decline; and, 2) what will be the rate of increase in acreage with impaired water quality due to the advancement of the seawater intrusion front. Based on this analysis, an assessment of the economic effects of 1) and 2) due to water supply wells becoming inoperable (i.e. dry), and the further loss of aquifer storage capacity due to the advancement of seawater intrusion can be conducted.

The numerical model should be used to predict groundwater head declines under different management scenarios, including implementing targeted pumping rates and optimizing the distribution of pumping. Future declines in groundwater head must be evaluated by simulated groundwater conditions so that “trigger (groundwater) head levels” can be used as a measure of safe yield and an early alert system as part of Basin Management Objectives. That analysis will extend the discussions and conclusions presented in this report.

EXHIBIT ‘B’

Simulated effects of ground-water management alternatives for the Salinas Valley, California

Water-Resources Investigations Report 87-4066

By: E.B. Yates

https://doi.org/10.3133/wri874066

Links

- Document: **Document** (pdf)
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Abstract

A two-dimensional digital groundwater flow model was developed to analyze the geohydrology of the groundwater basin in the Salinas Valley. The model was calibrated for steady-state and transient simulations by comparing simulated with measured or estimated inflows, outflows, and water levels for 1970-81. Preliminary estimates of hydraulic properties and some inflows and outflows were adjusted during model calibration. The simulated mean annual water budget for the basin was 559,500 acre-ft/yr each of outflow and inflow. Inflow components consisted of Salinas River recharge (38.3%), percolation of irrigation water (34.0%), small stream and Arroyo Seco recharge (20.9%), seawater intrusion (3.4%), and other sources (3.4%). Outflow components consisted of agricultural pumpage (91.5%), municipal pumpage (4.0%), and riparian phreatophyte evapotranspiration (4.5%). For the steady-state calibration, 70% of the simulated water levels were within 9 ft of measured water levels for 1970-81. A sensitivity analysis determined the overall stability of the model results. The model input variable that probably contributes most to the uncertainty of the results is the quantity of groundwater recharge contributed by irrigation-return flow to the unconfined aquifer. A 15% change in the estimate of this variable causes an 11% change in the simulated river-seepage rate and a 6% change in the simulated seawater intrusion rate. The calibrated model was used to investigate several water resources management alternatives. Projected pumpage increase at a rate of 1%/yr for 20 yr caused declines in mean annual water levels of 10 to 20 ft in some areas and an increase in seawater intrusion from 18,900 to 23 ,600 acre-ft/yr. Pumpage decreases in the coastal area decreased seawater intrusion more effectively than pumpage decreases farther inland. When pumpage was decreased uniformly throughout the valley, the decrease in seawater intrusion was only one-fourteenth the decrease in pumpage. Simulations indicated that replacement of groundwater pumpage with imported surface water in a 9,000 acre service area near the coast would result in a decrease in seawater intrusion equaling nearly one-half the quantity of imported water. (Author 's abstract)

Additional publication details

Publication type	Report
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Title	Simulated effects of ground-water management alternatives for the Salinas Valley, California
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Part or all of this report is presented in Portable Document Format (PDF). For best results viewing and printing PDF documents, it is recommended that you download the documents to your computer and open them with Adobe Reader. PDF documents opened from your browser may not display or print as intended. Download the latest version of Adobe Reader, free of charge. More information about viewing, downloading, and printing report files can be found here.

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August 12, 2021

VIA E-MAIL – BOARD@SVBGSA.ORG

Board of Directors
Salinas Valley Basin Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA 93924

RE: Preliminary Comment on Draft GSPs for the Eastside, Forebay, Langley, Monterey and Upper Valley Subbasins of the Salinas Valley Basin

Dear Chair Pereira and Members of the Board of Directors:

This office represents the Salinas Basin Water Alliance ("Alliance"), a California nonprofit mutual benefit corporation formed to preserve the viability of agriculture and the agricultural community in the greater Salinas Valley. Alliance members include agricultural businesses and families that own and farm more than 80,000 acres within the Salinas Valley. Many Alliance members have been farming in the Salinas Valley for generations. As such, the Alliance has a significant interest in the long-term sustainability of the Salinas Valley Basin.

The Alliance greatly appreciates the difficult work this Board, together with the Salinas Valley Basin Groundwater Sustainability Agency (GSA) staff and consultant team, has undertaken to implement the Sustainable Groundwater Management Act (SGMA) in Monterey County, including the time-consuming but extremely beneficial engagement with all stakeholders. The Alliance applauds the Salinas Valley Basin GSA's recent success in obtaining approval of the Department of Water Resources (DWR) for the first groundwater sustainability plan (GSP) required to be prepared for the six Salinas Valley Subbasins within the jurisdiction of the Salinas Valley Basin GSA. Further, the Alliance acknowledges and wholeheartedly supports the Board's commitment to coordinate and implement all of the GSPs for the Salinas Valley Basin within its jurisdiction in an integrated manner pursuant to the proposed Integrated Sustainability Plan, or as it may otherwise be titled.[1] It is with this objective—integrated groundwater management—in mind that the

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[1] See Joint Exercise of Powers Agreement Establishing the Salinas Valley Basin GSA § 2.2 ("The purpose of Agency is to . . . develop[], adopt[], and implement[] a GSP that achieves groundwater sustainability in the Basin."); § 4.1(c) (The JPA has the power to "develop, adopt and implement a GSP for the Basin.); § 4.1(l) (The JPA has the power to "establish and administer projects and programs for the benefit of the Basin."); Salinas Valley Groundwater Basin 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan [180/400 GSP] at 9-10 ("This GSP is part of an integrated plan for managing groundwater in all six subbasins of the Salinas Valley Groundwater Basin that are managed by the SVBGSA. The projects and management actions described in this GSP constitute an integrated management program for the entire Valley."); 180/400 GSP at 10-14 ("The SVBGSA oversees all or part of six subbasins in the Salinas Valley Groundwater Basin. Implementing the 180/400-Foot Aquifer Subbasin GSP must be integrated with the implementation of the five other GSPs in the Salinas Valley Groundwater Basin . . . The implementation

Alliance offers these preliminary comments on the draft GSPs for the Eastside, Forebay, Langley, Monterey and Upper Valley Subbasins.[2]

As this Board well knows, SGMA not only requires the Salinas Valley Basin GSA to develop a GSP for each priority subbasin within its jurisdiction to ensure the long-term sustainability of those subbasins, but it also mandates that the GSA consider the impacts each GSP may have on the ability of adjacent subbasins to achieve their sustainability goal.[3] In enacting SGMA, the legislature intended to provide for the sustainable management of all groundwater basins and expressly provided for the coordination of management between and among basins.[4] Any GSP that interferes with an adjacent basin's sustainability goal cannot satisfy SGMA.[5] Moreover, in the event the GSPs for the subbasins disproportionately allocate the burden of sustainability across the Salinas Valley Basin, they could impair groundwater users' rights in and to the Salinas Valley Basin in violation of SGMA and common law water rights.[6]

The Alliance's preliminary review of the draft GSPs suggests that there are significant data gaps and uncertainty with respect to the quantification of flows between subbasins within the Salinas Valley Basin that should be addressed.[7] Specifically, the Alliance is concerned that the existing water budget analyses in the draft GSPs may not provide a complete picture of the downgradient impacts caused by groundwater pumping. Accordingly, the Alliance requests that the Salinas Valley Basin GSA conduct additional simulations with the Salinas Valley Integrated Hydrologic Model (SVIHM) that are specifically focused on the issue of inter-subbasin groundwater flows, as more specifically described in aquilogic's August 11, 2021 memorandum attached to this letter. In light of the fact that the Integrated Sustainability Plan appears to have been delayed until after completion of the subbasin GSPs, the requested additional simulations should be conducted prior to the Salinas Valley Basin GSA's adoption of the subbasin GSPs.

The requested additional model simulations are consistent with and support SGMA's and DWR's requirements that all GSPs be based on the best available science.[8] They will enable an understanding of

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schedule reflects the significant integration and coordination needed to implement all six GSPs in a unified manner."); see also Salinas Valley Groundwater Basin Draft Upper Valley Aquifer Subbasin Groundwater Sustainability Plan at 10-16; Salinas Valley Groundwater Basin Draft Eastside Aquifer Subbasin Groundwater Sustainability Plan at 9-1, 10-7, 10-8, 10-16; Salinas Valley Groundwater Basin Draft Forebay Aquifer Subbasin Groundwater Sustainability Plan at 2-4, 9-2, 9-4, 10-7, 10-9, 10-17; Salinas Valley Groundwater Basin Draft Langley Aquifer Subbasin Groundwater Sustainability Plan at 2-4, 9-1, 9-4, 10-8, 10-9, 10-16.

[2] Following publication of the final draft GSPs for these subbasins, the Alliance may have additional comments.

[3] Wat. Code § 10733(c).

[4] Wat. Code §§ 10720.1(a); 10727; 10727.6

[5] See Wat. Code § 10733(c); 23 Cal. Code Regs. §§ 350.4, 351(h), 354.8(d), 354.18(b)(3), (c)(2)(B), (e), 354.28(b)(3), 354.44(a)(6), (c), 355.4(b)(7), 356.4(j), 357.2(b)(3); DWR, Monitoring Networks and Identification of Data Gaps BMP at pp. 6, 8, 27; DWR, Water Budget BMP at pp. 7, 12, 16, 17, 36; DWR, Modeling BMP at pp. 21-22; DWR, Sustainable Management Criteria BMP at pp. 9, 31.

[6] Wat. Code 10720.1(b) (declaring legislature's intention to preserve the security of water rights in the state to the greatest extent possible consistent with the sustainable management of groundwater); see also Water Code §§ 10720.5(b).

[7] 23 Cal. Code Regs. § 351.

[8] See 23 CCR § 354.18 ("A quantitative assessment of the historical water budget, starting with the most recently available information and extending back a minimum of 10 years, ***or as is sufficient to calibrate and reduce the uncertainty of the tools and methods used*** to estimate and project future water budget information and future aquifer response to proposed sustainable groundwater management practices over the planning and implementation horizon." (emphasis added).)

the amount of Basin-wide groundwater discharge that is and has been captured by pumping, which, depending on the results, may require modification of each subbasin's proposed water budget. In the absence of this analysis, there is a significant level of uncertainty in the water budgets that has the potential to undermine the adequacy of the GSPs and also to impair the Salinas Valley Basin GSA's ability to achieve its sustainability goal in each subbasin and throughout the Salinas Valley Basin within its jurisdiction.[9]

The Alliance has endeavored to make this comment and request at the earliest opportunity to allow the Salinas Valley Basin GSA sufficient time to conduct the additional SVIHM simulations. The Alliance does not wish to delay the successful completion and adoption of the subbasin GSPs. Rather, the Alliance anticipates that the additional simulations can feasibly be accomplished and incorporated into the draft GSPs consistent with the Salinas Valley Basin GSA's goal of adopting the subbasin GSPs in accordance with SGMA's deadlines.

The Alliance appreciates the Board's careful consideration of this issue and urges the Board to direct the Salinas Valley Basin GSA staff and consultant team to undertake the requested further analyses and incorporate the results into the draft GSP for each of the subbasins. The Alliance strongly believes that removing existing uncertainties with respect to inter-subbasin flows is a critical component to ensuring both transparency in the GSP development process and equity in the resulting plans, both of which are essential to promoting healthy Basin-wide dialogue and collaboration in obtaining sustainable groundwater management of the Salinas Valley Basin within the Salinas Valley Basin GSA's jurisdiction.

As the Board may direct, the Alliance would welcome the opportunity to discuss the requested additional consideration of inter-subbasin flows in more detail with the Salinas Valley Basin GSA's staff and consultant team.

Respectfully submitted,

Stephanie Osler Hastings

Attachment: August 11, 2021 aquilogic, inc. memorandum

cc: Donna Meyers, Senior Consultant / General Manager (meyersd@svbgsa.org)
Emily Gardner, Senior Advisor / Deputy General Manager (gardnere@svbgsa.org)
Derrik Williams, Montgomery & Assoc. (dwilliams@elmontgomery.com)
Leslie Girard, Monterey County Counsel (GirardLJ@co.monterey.ca.us)

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[9] DWR's June 3, 2021 determination that it does not appear that the GSP for the 180-400 Aquifer Subbasin will adversely affect the ability of an adjacent basin to implement its GSP or impede achievement of sustainability goals in an adjacent basin does not mean that the Salinas Valley GSA should assume that DWR will reach the same conclusion with respect to the remaining subbasin GSPs.

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August 11, 2021

MEMORANDUM

To: Stephanie Hastings, Brownstein Hyatt Farber Schreck (BHFS)
Sent via email: SHastings@bhfs.com
From: Robert H. Abrams, PhD, PG, CHg, Principal Hydrogeologist, aquilogic, Inc.
Anthony Brown, CEO & Principal Hydrologist, aquilogic, Inc.

Subject: Assessment of Groundwater Flows between Subbasins of the Salinas Valley Groundwater Basin (SVGB)
Project No.: 018-09

Aquilogic, Inc. (**aquilogic**) is pleased to provide this memorandum on behalf of our mutual client, the Salinas Basin Water Alliance (SBWA), outlining the justification and necessity for conducting additional simulations with the Salinas Valley Integrated Hydrologic Model (SVIHM),[1] which is being used by the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) for groundwater sustainability plan (GSP) development.

Aquilogic hypothesizes that pumping has captured significant portions of groundwater discharge that would otherwise migrate as underflow from the Upper Valley Subbasin to the Forebay Subbasin, from the Forebay Subbasin to the 180/400-Ft Aquifer Subbasin and East Side Subbasin, and potentially from the 180/400-Ft Aquifer Subbasin to the Monterey Subbasin and the Salinas River. Our primary concern is that the existing water budget analyses in at least three of the SVBGSA's draft GSPs may not provide a complete picture of the downgradient impacts caused by groundwater pumping.[2]

It should be noted that groundwater sustainability was a pertinent issue for water managers long before the advent of California's Sustainable Groundwater Management Act. There is

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[1] The SVIHM is a provisional, unpublished model not currently available to the general public.

[2] Bredehoeft, J.D., Papadopulos, S.S., and Cooper, H.H. Jr. (1982). The water budget myth. *In* Scientific Basis of Water Resource Management, Studies in Geophysics, 51-57. Washington, D.C. National Academy Press;
Bredehoeft, J.D. (1997). Safe yield and the water budget myth. Ground Water, Vol. 35, No. 6, p. 929;
Bredehoeft, J.D. (2002). The water budget myth revisited: why hydrogeologists model. Ground Water, Vol. 40, No. 4, p. 340-345;
Bredehoeft, J.D. and Durbin, T. (2009). Groundwater development: the time to full capture problem. Ground Water, Vol. 47, No. 4, p. 506-514;
Bredehoeft, J.D. (2011). Monitoring regional groundwater extraction: the problem. Ground Water, Vol. 49, No. 6, p. 808-814.

ample support in the groundwater literature for considering multiple aspects of sustainability and undesirable results, including economic and social impacts and the contravention of water rights.[3]

ADDITIONAL SIMULATIONS

As stated in "SVIHM Frequently Asked Questions,"[4] one of the many questions that can be addressed by a model is: How much groundwater flows between subareas? Clearly, the SVIHM developers recognized the importance of this question and anticipated that it would be asked. On behalf of the SBWA, **aquilogic** requests that the SVBGSA utilize the SVIHM to conduct additional simulations that are specifically focused on the issue of inter-subbasin groundwater flows. The requested simulations will enable an improved understanding of the amount of Valley-wide groundwater discharge that is and has been captured by pumping, which may be needed to ensure the adequacy of the GSPs for each of the subbasins and important to their implementation.

Aquilogic recommends a type of "superposition" analysis, in which the results of two simulations are compared. In such an analysis, the two simulations are identical except for the process under examination, in this case groundwater pumping. Pumping would be selectively turned off in one simulation and left as currently configured in the SVIHM in the other simulation. A similar superposition analysis was done to assess pumping-induced streamflow depletion, as described in Chapter 5 of the GSPs for the Forebay Subbasin and the East Side Subbasin.

The inter-subbasin flows would then be compared, which would semi-quantitatively estimate the impact of pumping, within the limiting assumptions and uncertainties associated with the SVIHM. Ideally, the analysis should be conducted with the initial conditions of the no-pumping scenario representing a "full" SVGB. The analysis would provide an estimate of the impact of pumping on inter-subbasin groundwater flows.

Specifically, using the calibrated SVIHM historical model, **aquilogic** recommends the following outline for conducting simulations, the details of which would be worked out in consultation with the SVBGSA:

1. Develop reasonable initial conditions for the hydraulic head distribution for the no-pumping simulation. This entails turning off all pumping in the model domain while

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[3] Todd, D.K. (1959). Groundwater Hydrology. Wiley, New York, 336 p.;
Domenico, P. (1972). Concepts and Models in Groundwater Hydrology. McGraw-Hill, New York, 405 p.;
Freeze, R.A. and Cherry, J.A. (1979). Groundwater. Prentice-Hall, 604 p.;
Alley, W.M., Reilly, T.E., and Franke, O.L. (1999). Sustainability of ground-water resources. U.S. Geological Survey Circular 1186, 79 p.

[4] https://www.co.monterey.ca.us/home/showdocument?id=31292

leaving all other inflows and outflows unchanged. Because the time for simulated water levels to recover may be longer than the SVIHM simulation period of 51 years (1967-2018), the simulation may have to be run multiple times before an average steady-state condition can be achieved. In this case, the hydraulic head distribution at the last time step of the previous simulation would be used as the initial condition of the subsequent simulation. This process would be repeated until the hydraulic head distribution at the last time step of a subsequent simulation is substantially identical to the last time step of the previous simulation. This would indicate that an average steady-state condition is being simulated. We assume here that the surface water inflows and reservoir releases for the 1967-2018 period would be sufficient to eventually "refill" the SVGB after several model runs.

2. When the average, no-pumping steady-state condition has been achieved with the modified SVIHM, simulated groundwater flow should occur from the East Side Subbasin to the 180/400-Ft Subbasin, and from the 180/400-Ft Subbasin to Monterey Bay, conditions that are now reversed.

3. From the final results of the no-pumping simulation, in which average steady-state conditions have been achieved, compute the inter-subbasin groundwater flows between each adjoining subbasin. Compare these flows with the inter-subbasin flows from the historical, unmodified SVIHM. The differences in inter-subbasin flows and induced recharge from the surface water system represent a semi-quantitative estimate of the impact of Valley-wide pumping.

4. Additional superposition analyses can be conducted to assess the impact of one subbasin's pumping on basin-wide groundwater levels and inter-subbasin groundwater flows, by turning on pumping in one subbasin at a time in the modified SVIHM (and leaving pumping turned off in all other subbasins) and comparing the results to the scenario with no pumping throughout the SVGB. The differences in inter-subbasin flows and groundwater levels represent a semi-quantitative estimate of the impact of one subbasin's pumping on the other subbasins.

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October 8, 2021

Salinas Valley Basin Groundwater Sustainability Agency
Att: Emily Gardner, Deputy General Manager
P.O. Box 1385
Carmel Valley, CA 93924

VIA: E-Mail

RE: Groundwater Sustainability Plans

Dear Ms. Gardner:

On behalf of the Board of Directors of Monterey County Farm Bureau, we express our appreciation for the dedication and diligence of both the SVBGSA's staff and the consultants of Montgomery & Associates for the progress made on the draft groundwater sustainability plans for all sub-basins, due in January 2022. This has been a tremendous lift of a workload, and the transparency provided at all the sub-basin committee meetings has greatly aided in the drafting of these plan documents.

We are encouraged that the draft sustainability plans, in their present form with minor revisions for clarification to be considered as the comments submitted are processed and reviewed, represent a pathway forward for sustainability. While we are not expressing specific language or policy suggestions in this letter, our Board and Committee members have participated in numerous meetings and expressed their comments during those specific chapter reviews.

As the drafts move forward to the SVBGSA Board of final approval, and then submission the Department of Water Resources in January 2022, it is important to keep in mind that the integration of all the collective plan provisions, practices, and projects does not propel harm on neighboring or adjacent sub-basins of the Salinas Valley during long-term implementation. The plans should all work as a cohesive whole, working towards sustainability for the entire groundwater basin regardless of the individual characteristics or status of any individual sub-basin.

In other words, the entire Salinas Valley basin needs to work together through congruent integration of all sub-basin plans to achieve the full groundwater sustainability objectives. Only through this integrated approach can all water users of the basin achieve the success that the individual plans detail.

Indeed, the collective management practices and proposed projects of all the sub-basin plans are a comprehensive and cohesive program that serves to achieve the sustainability of the entire Salinas Valley Groundwater Basin.

Sincerely,

Norman C. Groot
Executive Director

October 14, 2021

Colby Pereira, Chairperson
Members of the Board of Directors
Salinas Valley Basin Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA 93924
Via email board@svbgsa.org

Subject: Draft Groundwater Sustainability Plans for the Upper Valley Aquifer Subbasin, Forebay Aquifer Subbasin, Eastside Aquifer Subbasin, Langley Aquifer Subbasin, and Monterey Subbasin

Dear Chair Pereira and Members of the Board of Directors:

LandWatch Monterey County offers the following comments on the draft Groundwater Sustainability Plans (GSPs) for the above referenced subbasins.

A. Selection and funding of proposed projects are not coordinated among subbasins, which is contrary to the 180/400 GSP and DWR's findings approving it. And the five new GSP's fail to provide the evidence SGMA requires that their proposed projects are financially feasible.

1. The GSA represented to DWR in the 180/400 GSP that it will identify a suite of Basin-wide projects needed to attain sustainability, which will be funded through the Basin-wide water charges framework based on pumping allowances, and that this system will be set up by June 30, 2023.

The 180/400-Foot Aquifer Subbasin GSP (180/400 GSP) that was approved by DWR identifies 13 projects that purport to "constitute an integrated management program for the entire Valley," 9 of which are identified as "priority projects." (180/400 GSP, p. 9-25.) The 180/400 GSP states that "[s]ome subset of these priority projects <u>will be implemented</u> as part of the six Salinas Valley Groundwater Subbasin GSPs," although some additional projects may be needed in some basins. (*Id.*) The 180/400 GSP found that the "projects and management actions identified in Chapter 9 are sufficient for attaining sustainability in the 180/400-Foot Aquifer Subbasin <u>as well as the other five subbasins in the Salinas Valley Groundwater Basin</u>." (*Id.* at 10-9.)

The 180/400-Foot Aquifer Subbasin GSP (180/400 GSP) provides that a "water charges framework" (WCF) will be implemented basin-wide in order to fund these projects and to deter pumping in excess of groundwater allowances. (180/400 GSP pp. 9-2 to 9-4.) The WCF is to be based on tiered charges for different levels of groundwater pumping. Tier one charges would be based on a "Sustainable Pumping Allowance," and its revenues would cover just the GSA administration. Tier 2 and 3 charges would be assessed for amounts in excess of a "Transitional Pumping Allowance" and, after the Transitional Pumping Allowances are phased out, for amounts in excess of the Sustainable Pumping Allowance. Tier two and three revenues would be used to fund the new water supply projects. The pumping allowances and fee structures were to be separately determined for each subbasin, so they would not be uniform for each subbasin; but each subbasins tiered charges would be included "in the final water charges framework agreement." (*Id.* at 9-4.)

In approving the 180/400 GSP, DWR relied on the feasibility and likelihood of the integrated set of Basin-wide projects funded by a Basin-wide WCF:

> The projects and management actions designed to eliminate overdraft and prevent seawater intrusion are reasonable and commensurate with the level of understanding of the basin setting, as described in the Plan. The water charges framework, at this time, appears feasible and reasonably likely to mitigate overdraft, which is an important management action to help prevent undesirable results and ensure that the 180/400 Foot Aquifer Subbasin is operated within its sustainable yield.

(DWR, Statement of Findings Regarding The Approval Of The 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan, June 3, 2021, p. 2.) DWR found:

> To achieve sustainability, the Plan proposes to assess fees for groundwater extraction and use these funds to implement other projects or management actions, as needed. The proposal to charge fees for extraction is called the water charges framework and involves a three-tiered system where groundwater users will be charged a series of fees based on the volume of annual groundwater extraction. The proposal includes exemptions for some groundwater pumpers, including de minimis users that will not be included in the fee program. The foundation of the water charges framework is a sustainable pumping allowance that each parcel will be allocated based on the calculated sustainable yield. Groundwater users will be allowed to pump more than their sustainable allocation; however, this additional pumping (supplemental pumping) will be subject to higher extraction fees. The proposed water charges framework is also proposed to be instituted in the other five groundwater subbasins overseen by the SVBGSA, representing a Salinas Valley Basin-wide management action.

(*Id.*, p. 5.) DWR concluded that the "fundamental structure of groundwater management in the Subbasin is a management action called the water charges framework." (*Id.* at 31, emphasis added; see also *id.* at 33.) DWR found that "implementation of projects will depend, fully or partially, on revenue generated by the proposed water charges framework." (*Id.* at 13; see also *id.* at 33, 6.)

The 180/400 GSP requires development of the WCF by January 31, 2023 for all six subbasins:

> Details of the water charges framework for all six subbasins will be developed during the first three years of this GSP's implementation through a facilitated, Valley-wide process. This process will be similar to the successful facilitated process that resulted in the SVBGSA serving as the GSA for some or all parts of all six subbasins. The result of this facilitated process will be an agreement on the financing method approved by the SVBGSA. The facilitation will be complete by January 31, 2023, and the financing method will be implemented in all six subbasins immediately following.

(180/400 GSP at 10-4.) The 180/400 GSP also requires refining the list of projects intended to support the integrated management of the entire Basin on the same schedule:

> An additional benefit of refining the projects during the first three years of implementation is that this approach complements the approach for refining the water charges framework, as outlined in Section 10.2. Refinement of the projects and actions will occur simultaneously with refinement of the funding mechanism that supports the projects and actions. By refining all of these plans simultaneously, the funding mechanism and the projects will all be in place by June 30, 2023. Projects and management actions will then be immediately implemented in a coordinated fashion
> across the entire Salinas Valley Groundwater Basin.

(*Id.* at 10-10.)

Since the WCF is based on pumping allowances, these allowances must be determined on the same schedule:

> This GSP proposes a water charges framework that provides incentives to constrain groundwater pumping to the sustainable yield while generating funds for project implementation. The framework creates sustainable pumping allowances, charging a Tier 1 Sustainable Pumping Charge for pro-rata shares of sustainable yield, Tier 2 Transitional Pumping Charge to help users transition to pumping allowances, and higher Tier 3 Supplementary Pumping Charge for using more water. Pumping allowances are not water rights, but would be established to incentivize pumping reductions.

(*Id.* at ES-14.) The Sustainable Pumping Allowance is the "base amount of groundwater pumping assigned to each non-exempt groundwater pumper. The sum of all sustainable pumping allowances and exempt groundwater pumping is the sustainable yield of the Subbasin." (*Id.* at 9-3.) Pumping allowances "are not water rights. Instead, they are pumping amounts that form the basis of a financial fee structure to both implement the regulatory functions of the SVBGSA and fund new water supply projects." (*Id.*)

In short, determining pumping allowances, setting the tiered rates for the WCF, and selecting the basin-wide projects to be financed is supposed to accomplished simultaneously by January 2023 for all six subbasins.

2. **The five draft GSPs are inconsistent with the 180/400 GSP because they do not rely on, assume, or identify a common set of Basin-wide projects and do not include participation in a Basin-wide Water Charges Framework.**

Each of the five GSPs identify a different set of projects than each other and different than the projects identified in the 180/400 GSP. (See Tables 9-1 in each GSP.) There is little overlap among the projects, and there are no projects that are common to all of the GSPs.

Furthermore, both the UVA and Forebay GSPs expressly reject the Water Charges Framework. (Forebay GSP at 10-15 to 10-16; UVA GSP at 10-15 to 10-16.) The Eastside, Monterey, and Langley GSP's do not mention the water charges framework in their discussions of funding options. (Eastside GSP at 10-15; Monterey GSP at 10-23; Langley GSP at 10-15.)

At this point, the "fundamental structure" on which DWR relied to approve the 180/400 GSP has been set aside because the five new draft GSP no longer propose a Basin-wide Water Charges Framework or a common set of Basin-wide projects to attain sustainability.

If the GSA approves the five new GSPs as written, it must fundamentally revise the 180/400 GSP, which no longer appears viable if other subbasins will not fund a common set of projects. The problem that the GSA must address squarely is that pumping reductions, not just capital projects, are needed to attain sustainability in the 180/400-Foot Aquifer Subbasin. For example, instead of investing in a permanent $100 million+ pumping barrier to hold back seawater intrusion, the GSA should consider investing in a finite period of pumping reductions that would be sufficient to restore groundwater levels to protective elevations. A finite period of pumping reductions that restores protective elevations would obviate and may be less expensive than financing and operating a permanent pumping barrier. Once the protective elevations are restored, the 180/400 could resume pumping the full sustainable yield of the subbasin, which is all that SGMA allows. (The pumping barrier would not allow any <u>more</u> pumping than the sustainable yield.) In any event, pumping reductions are at least feasible, and as discussed below, there is no evidence that a pumping barrier is financially feasible.

3. **The UVA and Forebay GSPs do not require, and presumably will not fund, common Basin-wide projects.**

The only project listed by the UVA GSP and Forebay GSP that is common to some of the other GSPs is the Multi-benefit Stream Channel Improvements, which is included in the

Eastside and Monterey GSPs and which contains as one component the Invasive Species Eradication project described by the 180/400 GSP. But the Multi-benefit Stream Channel Improvements projects are expected to benefit primarily the GSP's along the Salinas River, rather than the Langley or Eastside subbasins, and it is not even included in the Langley GSP. Indeed, the GSPs do not estimate any benefits to the Monterey, Eastside, and Langley Subbasins from this project.

Furthermore, neither the UVA GSP nor the Forebay GSP actually purport to require any projects to attain sustainability. (UVA GSP at 9-1 [projects not necessary to maintain sustainability]; Forebay GSP at 9-1 to 9-2 [subbasin sustainable; only management actions to be pursued].) Both GSPs anticipate ongoing maintenance of sustainability through management actions, not projects. They list projects only in case they might be needed in the future.

At this point, no GSP should assume that the Forebay and UVA water users would agree to provide funding for any large Basin-wide capital projects, either through a water charges framework or a Proposition 218 vote. To the extent that the Eastside, Langley, and Monterey GSPs assume funding contributions or project-participation from the Forebay and UVA subbasins, the five draft GSPs are inconsistent on their faces and cannot be approved. The project discussions in the Eastside, Langley, and Monterey GSPs should be revised to make clear that the proposed projects do not rely on funding contributions or project-participation from the Forebay and UVA subbasins.

4. **The Eastside, Langley, and Monterey GSPs do not propose a commons set of Basin-wide projects and do not provide the evidence required by SGMA that any large capital projects that benefit multiple subbasins are financially feasible.**

Contrary to the expectation set up by the 180/400 GSP, there is no common set of Basin-wide projects proposed by the GSPs. Although there are several large capital projects that are listed by more than one of the GSPs, the GSPs fail to provide evidence that these projects are financially feasible. This failure is because the GSPs do not address the critical question of the willingness to pay for the water these projects might deliver.

For agricultural uses, irrigation water is an input to production, so the maximum value of water is constrained by expected returns. There must be some price beyond which agricultural users will not pay for water projects. Is it $500 AF? $750 AF? $1,000 AF? $1,500 AF? And how much water would be demanded at each of these prices? What does the demand curve for agricultural water supply look line in the Valley? The GSP's simply fail to address these critical questions.

Water markets provide some evidence of willingness to pay. Although some farmers have reportedly paid as much as $2,200 per AF for some amounts of water for high value crops (e.g., on a short term basis to protect investments in permanent crops), the average NASDAQ Veles California Water Index water futures price is now only $686 AF, an extraordinarily high price attained only as a result of a long drought period[1] Agricultural water has reached market prices in the $500 to $1000 range only in times of water stress.[2] Salinas Valley farmers may be willing to pay more for water due to their higher productivity than the average California farmer, but obviously there is a limit.

The analysis of fallowing options in the Eastside GSP provides some indirect evidence of willingness to pay; and since it is based on local land prices, it should reflect the range of agricultural productivities in the Salinas Valley. The Eastside GSP concludes that land could be fallowed to make its water available to other users by paying farmers rent and cover crop expenses. (Eastside GSP, p. 9-67.) Based on these land rents and cover crop expenses, farmers would be willing to forego farming for payments that represent water values of from $590 to $1,730 per AF. If agricultural users would find it more profitable not to use water at all when it is worth more than these values to others, it is not reasonable to suppose that they would vote to assess themselves for a capital project that produces water at higher costs per acre foot.

Despite this, the GSPs propose large capital water projects with unit costs well in excess of $1,000 per AF.[3] For example, the Eastside GSP identifies the Chualar and Soledad diversion projects using the 11043 water rights as costing $55 million and $104 million respectively. The 6,000 AFY provided by these diversion projects would cost $1,280 and $2,110 per AF respectively. The projects would benefit Eastside and 180/400 water users, but there is no analysis in either the Eastside GSP or the 180/400 GSP that would support the assumption that agricultural users would be willing to pay that much for water.

Similarly, both the Monterey and Eastside GSP's identify winter reservoir releases with ASR as a potential project, costing $172 million to provide 12,900 AFY at a unit cost of $1,450 per AF. Both the Monterey and Eastside GSPs say that the distribution of benefits would be determined through a benefits assessment. But there is simply no analysis that supports the assumption that there is a willingness to pay $1,450 per AF for agricultural water, much less to do so through a long term commitment in a Proposition 218 vote or through adoption of a Water Charges Framework.

The Eastside and Monterey GSPs both identify a Regional Municipal Supply project that is based on desalinating brackish water pumped from a seawater intrusion barrier. The unit cost for desalinating this water would come to $2,900 per AF, to which must be

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[1] Aquaoso, California Agricultural Water Prices by Water District, June 17, 2021, available at https://aquaoso.com/blog/california-agricultural-water-prices/.

[2] *Id.*

[3] By contrast, many of the projects that are proposed to benefit only one subbasin are more modest in scale and in price per AF.

added the $1,200 per AF to pump the source water from the seawater intrusion barrier. While municipal users are willing to pay more than agricultural users for water, there is no analysis in the Eastside and Monterey GSPs of how the costs would be allocated between agricultural and urban beneficiaries or whether either group would be willing to pay as much as $4,100 per AF for this water, which they now enjoy for the cost to pump it..

Some proposed large capital projects may make sense financially. The 3,500 acre CSIP expansion, identified in the Langley and Eastside GSPs, and already proposed in the 180/400 GSP, could proceed based on the existing CSIP model if the expanded benefit assessment district is willing to assess itself $630 per AF for this water. Similarly, the direct delivery (as opposed to the aquifer storage and recovery or ASR) of winter release water for MCWD's winter urban demand at $1,100 per AF may make sense given the likely willingness of new urban customers to pay higher rates.

Each of the GSPs should be revised to include a discussion of likely willingness to pay for the proposed capital projects and the likely financial feasibility of proposed projects. The discussion should reflect whether the large capital projects are scalable and whether sufficient numbers of water users would be willing to pay the average cost per AF to actually cover the minimum scale project's entire cost. The willingness of one water user to pay the average cost per AF is not evidence that the entire project can be funded.

Without an analysis of the willingness to pay for large capital projects, especially those projects for which the cost per AF is in excess of $500, the GSP's cannot be approved by DWR. SGMA requires that a GSP include both the estimated cost for each project and "a description of how the Agency plans to meet those costs." (23 CCR § 354.44(b)(8).) DWR must have substantial evidence to support a finding that the projects are "feasible" and that the GSA "has the financial resources necessary to implement the Plan." (23 CCR § 355.4(b)(5),(9).) The GSP's do not provide evidence that funding is actually feasible. Their discussions of project funding merely list the kinds of funding arrangements that are commonly used for large capital projects. (Eastside GSP at 10-15; Monterey GSP at 10-23; Langley GSP at 10-15; UVA GSP at 10-15; Forebay GSP at 10-15.) As noted, the UVA and Forebay GSPs do not propose to provide <u>any</u> project funding because they determine that no projects are actually needed, and they specifically reject participation in the Water Charges Framework. (Forebay GSP at 10-15 to 10-16; UVA GSP at 10-15 to 10-16.) Merely listing the kinds of arrangements that can <u>conceptually</u> be used to fund projects does not explain how the GSA could <u>actually</u> meet their costs, especially where there is substantial uncertainty about willingness to participate in these funding arrangements.

The findings that projects are financially feasible are particularly critical for the Eastside and Monterey Subbasins because they depend on the success of high capital, multi-subbasin projects to address overdraft conditions. (Eastside GSP at 9-103 to 9-104; Monterey GSP at 9-105.)

B. For the Monterey Subbasin GSP, the groundwater level sustainable management criteria and interim milestones fail to support the seawater intrusion criteria.

1. SGMA requires coordination of sustainable management criteria: groundwater level minimum thresholds must support the seawater intrusion minimum threshold.

SGMA requires that each minimum threshold must avoid *each* undesirable result because SGMA requires that "basin conditions at each minimum threshold will avoid undesirable results for *each of* the sustainability indicators." (23 CCR § 354.28(b)(2), emphasis added.) For example, the groundwater level minimum threshold must be "supported by" the "[p]otential effects on *other* sustainability indicators." (23 CCR 354.28(c)(1)(B), emphasis added.) This means that each minimum threshold, especially the groundwater level minimum threshold, must be coordinated to ensure that *all* undesirable results are avoided. Furthermore, a GSP must not "adversely affect the ability of an adjacent basin to implement its Plan or impede achievement of its sustainability goal." (23 CCR § 355.4(b)(7).)

2. The Monterey Subbasin GSP's proposed seawater intrusion SMCs do not permit any additional intrusion.

The Monterey Subbasin GSP sets the MT and MO for seawater intrusion for the lower 180-Foot Aquifer and the 400-Foot Aquifer at the line of advancement as of 2015. (Monterey GSP, p. 8-51.) The Monterey GSP sets the MT and MO for seawater intrusion to the Deep Aquifers at Highway 1, based on the observation that there is limited intrusion in these aquifers. (*Id.*, pp. 8-51 to 8-52.) In effect, the Monterey GSP commits the GSA not to permit any additional seawater intrusion in these aquifers. This is a proper goal in light of the clear impacts to beneficial users.

3. The Monterey Subbasin GSP's groundwater level SMCs and groundwater level interim milestones are set based on their effects on seawater intrusion.

The Monterey GSP acknowledges that the MT and MO for groundwater levels must support attainment of the seawater intrusion MT and MO because it identifies the primary consideration in setting the groundwater level MT and MO as the effect on seawater intrusion:

> As discussed in Section 3.1.6, groundwater use within the Marina-Ord Area is almost exclusively limited to generation of municipal supplies by MCWD. Groundwater elevations are significantly higher than municipal production well screen elevations in all aquifers in the Marina-Ord Area, and there is limited concern regarding the potential dewatering of groundwater production wells. Therefore, *groundwater levels that could cause undesirable results associated with other locally relevant sustainability indicators, such as the lateral or vertical*

> *expansion of the existing seawater intrusion extent and/or eventual migration of saline water into Deep Aquifer wells, have been used to define groundwater level minimum thresholds in the Marina-Ord Area*.

(Monterey GSP, p. 8-16, emphasis added.) The Monterey GSP also provides that

> . . . undesirable results caused by chronic lowering of groundwater levels in the Marina-Ord Area are primarily associated with the expansion of seawater intrusion and other locally relevant sustainability indicators. *These sustainability indicators have been considered when defining groundwater level minimum thresholds in the Marina-Ord Area*.

(Monterey GSP, p. 8-19, emphasis added.)

4. Setting the Monterey Subbasin GSP's groundwater level SMCs at historic 1995-2015 conditions is purportedly justified by the stability of the lateral extent of seawater intrusion in the Monterey Subbasin during that historic period.

The Monterey GSP contends that setting the groundwater level MT and MO for the 180- and 400-Foot Aquifers on the basis of the 1995 to 2015 groundwater levels is justified because the lateral extent of seawater intrusion in the Monterey Subbasin has been "generally stable" in that period:

> As discussed in the preceding sections, the potential effects of undesirable results caused by chronic lowering of groundwater levels in the Marina-Ord Area are primarily associated with the expansion of seawater intrusion. *The observed lateral extent of seawater intrusion within the Subbasin appears to have been generally stable within the 180- and 400-Foot Aquifers between 1995 and 2015. As such, minimum thresholds have been set based upon minimum groundwater elevations observed between 1995 and 2015 in the 180- and 400 Foot aquifers*. Seawater intrusion is additionally monitored and managed pursuant to seawater intrusion SMCs (Section 8.9 below) to verify seawater intrusion does expand within the Subbasin due to sea-level rise and/or changes in the groundwater gradient.

(Monterey GSP, p. 8-30.) There are several problems with this contention, discussed below.

5. The "stability" rationale for setting the Monterey Subbasin GSP's groundwater level SMC's based on historic conditions is undercut by the Monterey GSP's projections that historic conditions will not continue: groundwater levels will actually continue to decline and remain below historic conditions and the interim milestones permit such declines.

First, the contention that groundwater level SMCs are justified by historic conditions ignores the GSP's own projection that groundwater levels will continue to decline until at least 2033 and will not attain the MO until 2042. The Monterey GSP documents and projects in its "Example Trajectory for Groundwater Elevation Interim Milestones" that groundwater levels for a Marina-Ord well fell below the MT in 2019, will continue to fall until 2033, will not rise above the MT until 2039, and will not attain the MO until 2042. (Monterey GSP, pp. 8-42, Figure 8-12.) The interim milestones for wells in the 400-Foot Aquifer and the Deep Aquifers assume and permit that groundwater levels will remain below historic levels and the MT for most of the next 20 years:

> Within the Monterey Subbasin, for wells in the 400-Foot Aquifer, Deep, and El Toro Primary Aquifer System Aquifers where groundwater levels have been declining, groundwater elevation interim milestones are defined based on a trajectory informed by current (fourth quarter of 2020) groundwater levels, historical groundwater elevation trends [footnote], and measurable objectives. This trajectory allows for and assumes a continuation of historical groundwater elevation trends during the first 5-year period of GSP implementation, a deviation from that trend over the second 5-year period, and a recovery towards the measurable objectives in the third and fourth (last) 5- year period.

(Monterey GSP, p. 8-41.) The proposed interim milestones for wells in the 180-Foot and Deep Aquifers permit substantial declines in groundwater levels from 2020 conditions in the years 2027 and 2032. (*Id.*, p. 8-43 to 8-44, Table 8-3.) For some wells, the interim milestones would not require that the minimum threshold be met until 2037 or later. In short, the Monterey GSP does not expect that groundwater levels will actually remain within historic levels.

Allowing groundwater levels to fall below historic levels is purportedly justified because "there are large volumes of freshwater in the Subbasin that provide additional time and flexibility to reach identified SMCs while projects and management actions are implemented." (*Id.,* p. 8-41.) However, the draft GSP provides no evidence to suggest that groundwater levels that fall and remain below the historic conditions for at least the next ten years in the Marina-Ord area will not induce further seawater intrusion, resulting in a failure to meet the seawater intrusion SMCs. The evidence is to the contrary: lower groundwater levels increase seawater intrusion.[4] Thus, declining groundwater levels

[4] Geoscience, Protective Elevations to Control Seawater Intrusion in the Salinas Valley, 2013, available at https://www.co.monterey.ca.us/home/showdocument?id=19642.

will make it impossible to meet the seawater intrusion minimum threshold and measurable objective, which require a halt to the advancement of seawater intrusion.

In summary, the historic "stability" rationale cannot be extrapolated to claim that groundwater levels well below the historic record will continue to result in a stable areal extent of seawater intrusion. It makes no sense to contend that setting the MT and MO on the basis of historic conditions will halt seawater intrusion when the GSP would effectively fail to maintain those historic conditions.

The historic stability rationale also ignores the fact that Deep Aquifer groundwater levels began dropping in 2014, have continued to drop, and are projected to continue to drop due to increased levels of extractions. MCWRA reported in 2020 that Deep Aquifer groundwater levels have been falling since 2014, are well below sea-level, and that induced vertical migration of contaminated water to the Deep Aquifers themselves is in fact occurring:

> As is the case with the 180-Foot and 400-Foot Aquifers, groundwater levels in the Deep Aquifers are predominantly below sea level. Beginning around 2014, groundwater levels in the Deep Aquifers began declining and are presently at a deeper elevation than groundwater levels in the overlying 400-Foot Aquifer based on comparisons of multiple well sets at selected locations, meaning that there is a downward hydraulic gradient between the impaired 400-Foot Aquifer and the Deep Aquifers (Figure 16 and Figure 17). This decrease in groundwater levels coincides with a noticeable increase in groundwater extractions from the Deep Aquifers (Figure 16 and Figure 17). The potential for inducing additional leakage from overlying impaired aquifers is a legitimate concern documented by previous studies and is something that would be facilitated by the downward hydraulic gradient that has been observed between the 400-Foot Aquifer and Deep Aquifers.
>
> Seawater intrusion has not been observed in the Deep Aquifers. However, the Agency has documented the case of one well, screened in the Deep Aquifers, that is enabling vertical migration of impaired groundwater into the Deep Aquifers. The Agency is working with the well owner on destruction of this well.[5]

In addition to the threat to contaminate the Deep Aquifers, the induced vertical migration of upper aquifer groundwater to the Deep Aquifers aggravates seawater intrusion in those upper aquifers. A 2003 study for MCWD concluded that increasing pumping of the Deep Aquifers from the 2002 baseline level of 2,400 AFY to just 4,000 AFY would (1) induce

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[5] Monterey County Water Resources Agency (MCWRA), Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin: 2020 Update, May 2020, p. 31, https://www.co.monterey.ca.us/home/showdocument?id=90578

further seawater intrusion into the upper aquifers (the 180-Foot and 400-Foot Aquifers), which were vertically connected, and (2) risk contamination of the Deep Aquifers themselves.[6] Deep Aquifer pumping is now in excess of 10,000 AFY.[7]

And, in fact, the Monterey GSP admits that falling groundwater levels in the Deep Aquifer threatens to contaminate the Deep Aquifers and to induce seawater intrusion in the upper aquifers:

> Seawater intrusion has not been observed in the Deep Aquifer to date. However, groundwater elevations have been declining and are significantly below sea level. The declining groundwater elevations in the Deep Aquifer may be causing groundwater elevations to fall within the 400-Foot Aquifer in the southwestern portion of the Marina-Ord Area (i.e., near wells MPMWD#FO-10S and MPMWD#FO-11S). Although there is some uncertainty whether the Deep Aquifer is subject to seawater intrusion from the ocean, continued decline of groundwater elevations in the Deep Aquifers could increase the risk of seawater intrusion and may eventually cause vertical migration of saline water from overlying aquifers into the Deep Aquifers. As such, minimum thresholds for the Deep Aquifers are set to historically observed minimum groundwater elevations between 1995 and 2015, which is equivalent to the groundwater elevations observed in 2015 for most Deep Aquifer wells.

(Monterey GSP, p. 8-30.) Again, setting the groundwater level MT and MO to historic levels but then allowing another ten to twenty years to pass before the interim milestones actually require attainment of these historic levels cannot demonstrably ensure that there is no further advancement of seawater intrusion. However, no further advancement is precisely what is required by the seawater intrusion MT and MO.

In sum, interim milestones cannot be set at a level that permits continued declines in groundwater levels if the Monterey GSP is to find that the groundwater levels are consistent with the seawater intrusion SMCs.

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6 WRIME, Deep Aquifer Investigative Study, May 2003, pp. 4-7, 4-11 to 4-12, pdf available upon request.

7 Monterey County Water Resources Agency (MCWRA), Well Permit Application Activities Update, prepared for May 17, 2021 MCWRA Board of Directors meeting, https://monterey.legistar.com/View.ashx?M=F&ID=9381226&GUID=34ED34CD-3A39-4851-87A3-298BE70D383C

6. The Monterey Subbasin GSP fails to assess the effects on other subbasins of setting groundwater level SMCs based on historic conditions or allowing groundwater levels to decline further through relaxed interim milestones.

As the Monterey GSP acknowledges, the interconnectivity between the 180/400-Foot Aquifer Subbasin and the Monterey Subbasin requires coordination of the sustainable management criteria for both subbasins. (Monterey GSP, p. 8-35.) Coordination is required in order to meet SGMA's requirement that the SMC's for one subbasin do not prevent another subbasin from meeting its sustainability goal. (23 CCR § 355.4(b)(7).)

Setting the groundwater level MT and MO at historic levels and then effectively ignoring these criteria through use of relaxed interim guidelines for ten to twenty years may very well impair attainment of the seawater intrusion criteria for the 180/400-Foot Aquifer GSP, which are also set at a level that permits no further advancement of the seawater intrusion front.

However the Monterey GSP provides no analysis of that possibility. Instead, the Monterey GSP proposes to defer the assessment of the impact of the Monterey Subbasin's groundwater level MTs on the Deep Aquifers in the neighboring 180/400-foot Aquifer Subbasin until after completion of the long-delayed Deep Aquifers Study and the eventual establishment of Deep Aquifer SMCs for the 180/400-foot Aquifer Subbasin.

The Deep Aquifer Study, recommended four years ago, has not commenced.

Furthermore, there is no reason that an assessment of the effects of the Monterey Subbasin's groundwater level MTs should be limited to its effects on the Deep Aquifers in the 180/400-Foot Subbasin. The assessment should also include an assessment of the effects of the Monterey Subbasin's groundwater level MTs on seawater intrusion of each of the principal aquifers in that neighboring subbasin. The Monterey Subbasin GSP argues that pumping in the 180/400-Foot Aquifer Subbasin has caused seawater intrusion in the Monterey Subbasin. In turn, the Monterey Subbasin GSP must assess the reciprocal effects of its own pumping, SMCs, and interim milestones on the 180/400-Foot Aquifer Subbasin.

SGMA's mandate to use the best available science is not an invitation to let the perfect be an enemy of the good pending completion of the Deep Aquifer study. The Monterey GSP must use the whatever science is now available to provide some discussion and assessment of the effect on the neighboring subbasins of allowing continued reductions in Monterey Subbasin groundwater levels below historic conditions through relaxed interim thresholds.

Again, it is not reasonable to extrapolate beyond the historic data to assume that lower-than-historic groundwater levels in the Monterey Subbasin will not impair adjacent basins. The purported stability of the lateral extent of seawater intrusion in the Monterey Subbasin from 1995 to 2015 was certainly not matched in the 180/400-Foot Aquifer

Subbasin, where seawater intrusion rapidly advanced during that period. The Monterey GSP provides no evidence to justify the assumption that allowing lower-than-historic groundwater levels in the Monterey Subbasin will not contribute to the continuing seawater intrusion in the neighboring subbasin.

Finally, the Monterey Subbasin GSP must also evaluate and address the effects of reduced groundwater levels in the Corral de Tierra Subarea on the Seaside Subasin. Again, there is no evidence in the record that merely maintaining historic groundwater levels is sufficient to support groundwater levels in the Seaside Subbasin. To the contrary, comments by the Seaside Basin Watermaster indicate that chronic lowering of groundwater levels in the Laguna Seca Subarea of the Seaside Subbasin can only be corrected by reducing existing pumping in the Corral de Tierra, i.e., increasing groundwater levels above historic levels. (Robert Jacques, PE, email to Sarah Hardgrave, et al., March 22, 2021.) Setting Monterey Subbasin groundwater level SMC's at historic levels violates SGMA because it will prevent attainment of groundwater level objectives in the adjacent Seaside Subbasin.

C. For the Eastside Subbasin GSP, the groundwater level sustainable management criteria and interim milestones also fail to support the seawater intrusion criteria.

As discussed above, SGMA requires that each minimum threshold must avoid *each* undesirable result because SGMA requires that "basin conditions at each minimum threshold will avoid undesirable results for *each of* the sustainability indicators." (23 CCR § 354.28(b)(2), emphasis added.) For example, the groundwater level minimum threshold must be "supported by" the "[p]otential effects on *other* sustainability indicators." (23 CCR 354.28(c)(1)(B), emphasis added.) This means that each minimum threshold, especially the groundwater level minimum threshold, must be coordinated to ensure that *all* undesirable results are avoided.

However, the groundwater level SMCs for the Eastside Subbasin fail to support the seawater intrusion SMC. Although the Eastside Subbasins is not seawater intruded itself, its GSP sets its seawater intrusion minimum threshold to prevent any seawater intrusion over the 500 mg/l threshold in any subbasin, in effect acknowledging that conditions in the Eastside Subbasin can cause seawater intrusion in adjacent subbasins. (Eastside GSP, p. 8-29.) In its discussion of its sustainability indicators for groundwater levels, the Eastside GSP acknowledges that "interference with other sustainability indicators," e.g., the sustainability indicators for seawater intrusion, would be a significant an unreasonable condition. (*Id.*, p. 8-7.) The Eastside GSP states that that the groundwater level minimum threshold is "intended not to exacerbate the rate of seawater intrusion." (*Id.*, p. 8-15.)

Overdraft conditions in the Eastside Subbasin that lower groundwater levels create a gradient causing subsurface flows from the 180/400 Subbasin to the Eastside Subbasin. These subsurface outflows from the 180/400 Subbasin contribute to seawater intrusion by negatively affecting the water budget in the 180/400 Subbbasin. The Eastside GSP acknowledges that the historic groundwater levels in the Eastside Subbasin, including the pumping trough around Salinas, have resulted in net subsurface outflows from the 180/400 Subbasin to the Eastside Subbasin. (*Id.*, p. 6-19.) Figure 6-9 demonstrates that there have been increasing net subsurface outflows from the 180/400 Subbasin to the Eastside Subbain since 1980. (*Id.*) For example, there are substantial net subsurface outflows from the 180/400 Subbasin to the Eastside Subbasin in both 2011 and 2015, and all of the other years after 1980. (*Id.*) Despite this, the Eastside GSP sets the minimum threshold for groundwater levels at the historic 2015 levels and sets the measurable objective at the 2011 level.[8] (*Id.*, pp. 8-7, 8-18.) In short, the Eastside SMC's are set at levels that will continue to induce subsurface outflows from the seawater intruded 180/400 Subbasin.

The Eastside Subbasin GSP fails to analyze the possibility that its minimum thresholds for groundwater levels and storage depletion will contribute to seawater intrusion in the 180/400 Subbasin. Instead, the Eastside GSP simply punts this issue to the future:

> Minimum thresholds for the Eastside Subbasin will be reviewed relative to information developed for the neighboring subbasins' GSPs to ensure that these minimum thresholds will not prevent the neighboring subbasins from achieving sustainability.

(Eastside GSP, p. 8-16.) It is unclear when this review will occur, especially for the 180/400 Subbasin, for which a GSP has already been adopted. Regardless, deferral of the analysis is not sufficient. SGMA requires that the Eastside GSP squarely address whether it "will adversely affect the ability of an adjacent basin to implement its Plan or impede achievement of its sustainability goal." (23 CCR § 355.4(b)(7).) The GSP must support its conclusions with substantial evidence after applying the best science that is available now. (23 CCR § 354.44(c).) It is clear that the groundwater level and storage depletion sustainability indicators for the Eastside Subbasin will continue to contribute to seawater intrusion in the 180/400 GSP by inducing subsurface flows out of the 180/400 Subbasin. Since the 180/400 Subbasin minimum threshold for seawater intrusion requires halting any further seawater intrusion, any further inducement of seawater intrusion will prevent the attainment of sustainability by the 180/400 Subbasin.

The Eastside GSP must be revised to provide minimum thresholds and measureable objectives for groundwater levels that will not prevent attainment of sustainability by the 180/400 Subbasin, and it must provide an analysis based on the best available science to explain why.

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[8] The Eastside GSP also sets the minimum threshold for storage reduction using the groundwater level minimum threshold as a proxy indicator. (Eastside GSP, p. 8-23.)

D. Water quality sustainable management criteria should not be limited to effects caused by "direct GSA action." The GSPs must also regulate extractions that cause undesirable results, and do so through a specific and enforceable management action.

The five new GSPs purport to limit significant and unreasonable conditions related to groundwater quality degradation to just those "[l]ocally defined significant and unreasonable changes in groundwater quality resulting from *direct GSA action*." (Monterey GSP, p. 8-56, italics added; see also, e.g., Eastside GSP, p. 8-34.) Thus, the GSPs claim that the GSA need only address water quality degradation that is a "direct result of projects or management actions conducted pursuant to GSP implementation:"

> For the Subbasin, any groundwater quality degradation that leads to an exceedance of MCLs or SMCLs in potable water supply wells or a reduction in crop production in agricultural wells <u>that is a direct result of GSP implementation</u> is unacceptable. Some groundwater quality changes are expected to occur independent of SGMA activities; because these changes are not related to SGMA activities they do not constitute an undesirable result. Therefore, the degradation of groundwater quality undesirable result is:
>
> > *Any exceedances of minimum thresholds during any one year <u>as a direct result of projects or management actions conducted pursuant to GSP implementation</u> is considered as an undesirable result.*

(Monterey GSP, p. 8-56, underlining added.)

This language does not define what constitutes a "direct result" of GSP implementation or "direct GSA action." However, elsewhere, the GSP's give three examples of conditions that may lead to an undesirable result and that the GSA is presumably prepared to address:

> • Required Changes to Subbasin Pumping. If the location and rates of groundwater pumping change *as a result of projects implemented under the GSP*, these changes could alter hydraulic gradients and associated flow directions, and cause movement of constituents of concern towards a supply well at concentrations that exceed relevant standards.
>
> • Groundwater Recharge. *Active recharge of imported water or captured runoff* could modify groundwater gradients and move constituents of concern towards a supply well in concentrations that exceed relevant limits.
>
> • Recharge of Poor-Quality Water. *Recharging the Subbasin* with water that exceeds an MCL, SMCL, or level that reduces crop production could lead to an undesirable result.

(Monterey GSP, p. 8-58; see also Eastside GSP, p. 8-42 [same].) Significantly, none of these three conditions that might trigger GSA action include excessive pumping or changes in pumping by other parties that may cause water quality degradation; each condition includes only the secondary effects of the GSA's own projects. But the GSA's failure to take management action to regulate other parties, e.g., its failure to restrict excessive extractions or changes in pumping by other parties, may also cause water quality degradation. For example, the Community Water Center (CWC) has documented that for the San Jerardo Cooperative, Inc., increasing levels of nitrate and arsenic correspond to lower groundwater levels.[9] CWC has documented that "contaminants like arsenic, uranium, and chromium (including hexavalent chromium) are more likely to be released under certain geochemical conditions influenced by pumping rates, geological materials, and water level fluctuations."[10] It is clear that pumping levels and pumping changes can mobilize, concentrate, or move existing contaminants so as to cause water quality degradation. The GSA has a duty under SGMA to prevent this.

The Monterey GSP contends that because other agencies have authority over groundwater quality, the GSA's role is somehow limited:

> The powers granted to GSAs to effect sustainable groundwater management under SGMA generally revolve around managing the quantity, location, and timing of groundwater pumping. SGMA does not empower GSAs to develop or enforce water quality standards; that authority rests with the SWRCB Division of Drinking Water and Monterey County. Because of the limited purview of GSAs with respect to water quality, and the rightful emphasis on those constituents that may be related to groundwater quantity management activities.
>
> Therefore, this GSP is designed to avoid taking any action that may inadvertently move groundwater constituents already in the Subbasin in such a way that the constituents have a significant and unreasonable impact that would not otherwise occur.

(Monterey GSP, pp. 8-60 to 8-61; see also Eastside GSP, p. 8-35.) The fact that the County *and* the RWQCB also have authority and responsibility to address water quality degradation demonstrates that the statutory scheme does not rely on the regulatory

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9 Community Water Center, letter to SVGBGSA, April 23, 2021, re Comments on the Draft Salinas Valley GSP Chapters 1-8 for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins, p. 1.

10 *Id.*, pp. 1-2, citing Community Water Center and Stanford University, 2019. Factsheet "Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium" for more information.https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/156 0371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

actions of any single agency. Nothing in SGMA's mandate that the GSP address water quality degradation permits the GSA to ignore water quality degradation that results from third party pumping or to ignore such third party degradation unless the GSA has affirmatively regulated pumping. The GSP must address the effects of its regulatory acts <u>or omissions</u>, including omissions that move, mobilize, or concentrate pollutants by permitting excessive extractions or changes in extractions by groundwater pumpers.

Indeed, DWR has made it clear in its imposition of corrective actions on the 180/400-Foot Aquifer Subbasin GSP that "groundwater management *and extraction*" mustg be addressed because it may result in degraded water quality:

> RECOMMENDED CORRECTIVE ACTION 5 Coordinate with the appropriate groundwater users, including drinking water, environmental, and irrigation users as identified in the Plan, and water quality regulatory agencies and programs in the Subbasin to understand and develop a process for determining if groundwater management *and extraction* is resulting in degraded water quality in the Subbasin.[11]

Accordingly, the GSP cannot limit its concern to the effects of its own projects without taking responsibility for the effects of unregulated, excessive, or changed extractions on water quality degradation.

For example, if there is evidence that arsenic contaminations are mobilized or concentrations increased by new or excessive extractions, then the GSP must manage extractions to avoid undesirable results from mobilized, moved, or concentrated arsenic. The GSP cannot simply state that there "is no clear correlation that can be established between groundwater levels and groundwater quality at this time" as if that disposes of the matter for the GSP planning horizon. (Monterey GSP, p. 8-58.) The GSA must adopt an effective program to investigate, apply the best available science, and manage the resource to prevent undesirable contaminant concentrations caused by excessive or changed extractions, whether those are due to changes the GSA requires in subbaasin pumping or due to the failure of the GSA to regulate existing pumping in the first instance.

In sum, the GSPs fail to propose a coordinated system of meaningful sustainable management criteria and a management action to address water quality degradation. The minimum threshold and measureable objectives should be based on zero exceedances of water quality standards, as in the Eastside GSP so that each and every instance of water quality degradation can be determined and action can be prompted. (Eastside GSP, pp. 8-34, 8-41.) The GSP's should provide for a more robust monitoring program <u>and a self-reporting program</u> so that any exceedance will actually be determined. It is not sufficient to monitor only a small sampling of domestic wells.

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[11] Department of Water Resources, GSP Assessment Staff Report Salinas Valley – 180/400 Foot Aquifer (Basin No. 3-004.01), June 3, 2021, p. 37, emphasis added available at https://sgma.water.ca.gov/portal/gsp/assessments/29.

Most importantly, the proposed "Water Quality Partnership" implementation action needs to be revised so that it is an effective, enforceable commitment to action by the agency with the most direct oversight of the cause of any exceedance. (See, e.g., Eastside GSP, pp. 9-100 to 9-101.) The proposed Water Quality Partnership contains only the flowing proposals for action:

> SVBGSA will coordinate with the appropriate water quality regulatory programs and agencies in the Subbasin to understand and develop a process for determining when groundwater management and extraction are resulting in degraded water quality in the Subbasin. . . . Under this implementation action, SVBGSA will play a convening role by developing and coordinating a water quality partnership (Partnership). . . . The Partnership will review water quality data, identify data gaps, and coordinate agency communication. The Partnership will include the Regional Water Quality Control Board, local agencies and organizations, water providers, domestic well owners, technical experts, and other stakeholders. The Partnership will convene at least annually. The goal of the Partnership will include documenting agency actions to address water quality concerns. An annual update to the SVBGSA Board of Directors will be provided regarding Partnership efforts and convenings.

(Eastside GSP, p. 9-101.) In effect, the Water Quality Partnership calls for holding an annual meeting and writing a report. This is not a sufficient basis to find that the GSA has met its statutory obligation to adopt a plan that will actually address water quality degradation.

At minimum, a management action that addresses water quality degradation should include the following specific steps, which should be negotiated and memorialized in an MOU with the CCRWQCB and the Monterey County Department of Environmental Health:

- The agencies should arrange to monitor a sufficiently representative sampling of domestic wells to reliably determine any instance of a domestic well's failure to meet water quality standards.
- The agencies should accept and verify self-reporting of instances of failures to meet water quality standards.
- For each instance of failure to meet water quality standards, the agencies should ascertain whether the cause includes (1) discharge of pollutants, as determined by the CCRWQCB or the County DEH, and/or (2) pumping activity that has concentrated, mobilized, or moved pollutants, as determined by SVBGSA or the County DEH.
- Where the cause includes pumping activity, the SVBGSA should take action to abate the pumping that is causing the failure to meet water quality standards.

Absent such a program, the GSPs do not meet the statutory obligation to adopt a plan that will actually address water quality degradation.

Yours sincerely,

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October 15, 2021

Salinas Valley Basin GSA
P.O. Box 1350
Carmel Valley, CA 93924

Submitted via web: https://form.jotform.com/201537036733047

Re: Public Comment Letter for the Eastside Aquifer Subbasin Draft GSP

Dear Donna Meyers,

On behalf of the above-listed organizations, we appreciate the opportunity to comment on the Draft Groundwater Sustainability Plan (GSP) for the Eastside Aquifer Subbasin being prepared under the Sustainable Groundwater Management Act (SGMA). Our organizations are deeply engaged in and committed to the successful implementation of SGMA because we understand that groundwater is critical for the resilience of California's water portfolio, particularly in light of changing climate. Under the requirements of SGMA, Groundwater Sustainability Agencies (GSAs) must consider the interests of all beneficial uses and users of groundwater, such as domestic well owners, environmental users, surface water users, federal government, California Native American tribes and disadvantaged communities (Water Code 10723.2).

As stakeholder representatives for beneficial users of groundwater, our GSP review focuses on how well disadvantaged communities, drinking water users, tribes, climate change, and the environment were addressed in the GSP. While we appreciate that some basins have consulted us directly via focus groups, workshops, and working groups, we are providing public comment letters to all GSAs as a means to engage in the development of 2022 GSPs across the state. Recognizing that GSPs are complicated and resource intensive to develop, the intention of this letter is to provide constructive stakeholder feedback that can improve the GSP prior to submission to the State.

Based on our review, we have significant concerns regarding the treatment of key beneficial users in the Draft GSP and consider the GSP to be **insufficient** under SGMA. We highlight the following findings:

1. Beneficial uses and users **are not sufficiently** considered in GSP development.
    a. Human Right to Water considerations **are not sufficiently** incorporated.
    b. Public trust resources **are not sufficiently** considered.
    c. Impacts of Minimum Thresholds, Measurable Objectives and Undesirable Results on beneficial uses and users **are not sufficiently** analyzed.
2. Climate change **is not sufficiently** considered.
3. Data gaps **are not sufficiently** identified and the GSP **does not have a plan** to eliminate them.

4. Projects and Management Actions **do not sufficiently consider** potential impacts or benefits to beneficial uses and users.

Our specific comments related to the deficiencies of the Eastside Aquifer Subbasin Draft GSP along with recommendations on how to reconcile them, are provided in detail in **Attachment A.**

Please refer to the enclosed list of attachments for additional technical recommendations:

Attachment A	GSP Specific Comments
Attachment B	SGMA Tools to address DAC, drinking water, and environmental beneficial uses and users
Attachment C	Freshwater species located in the basin
Attachment D	The Nature Conservancy's "Identifying GDEs under SGMA: Best Practices for using the NC Dataset"
Attachment E	Maps of representative monitoring sites in relation to key beneficial users

Thank you for fully considering our comments as you finalize your GSP.

Best Regards,

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Clean Water Action/Clean Water Fund

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Union of Concerned Scientists

Samantha Arthur
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Heather Lukacs, Ph.D.
Director of Community Solutions
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Attachment A

Specific Comments on the Eastside Subbasin Draft Groundwater Sustainability Plan

1. Consideration of Beneficial Uses and Users in GSP development

Consideration of beneficial uses and users in GSP development is contingent upon adequate identification and engagement of the appropriate stakeholders. The (A) identification, (B) engagement, and (C) consideration of disadvantaged communities, drinking water users, tribes, groundwater dependent ecosystems, streams, wetlands, and freshwater species are essential for ensuring the GSP integrates existing state policies on the Human Right to Water and the Public Trust Doctrine.

A. Identification of Key Beneficial Uses and Users

Disadvantaged Communities and Drinking Water Users

The identification of Disadvantaged Communities (DACs) and drinking water users is **incomplete**. The GSP provides information on DACs, including identification by name and location on a map (Figure 2-3), and identifying the water source for DAC members. However, the GSP fails to identify the population of each identified DAC.

The GSP provides a density map of domestic wells in the subbasin. However, the GSP fails to provide depth of these wells (such as minimum well depth, average well depth, or depth range) within the subbasin.

These missing elements are required for the GSA to fully understand the specific interests and water demands of these beneficial users, and to support the development of sustainable management criteria and projects and management actions that are protective of these users.

RECOMMENDATIONS
• Include a map showing domestic well locations and average well depth across the subbasin. • Provide the population of each identified DAC.

Interconnected Surface Waters

The identification of Interconnected Surface Waters (ISW) is **insufficient**, due to lack of supporting information provided for the ISW analysis. To assess ISWs, the GSP used the Salinas Valley Integrated Hydrologic Model (SVIHM). The GSP states (p. 4-23): "*Although seepage along the ISW reaches is based on assumed channel and aquifer parameters as model inputs, the preliminary SVIHM is the best available tool to estimate ISW locations. The model construction and uncertainty are described in Chapter 6 of this GSP.*" However, Chapter 6 of the GSP, the water budget chapter, presents very little information on the model. No further information in the GSP was presented providing description of the location of groundwater wells or stream gauges used in the analysis, or description of temporal (seasonal and interannual) variability of the data used to calibrate the model.

The GSP states (p. 4-23): *"The blue cells [in Figure 4-9] indicate areas where surface water is connected to groundwater for more than 50 percent of the number of months in the model period and are designated as areas of ISW. The clear cells represent areas that have interconnection less than 50 percent of the model period and require further evaluation to determine whether the SMC, discussed in Chapter 8, apply.*" Note the regulations [23 CCR §351(o)] define ISW as "surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted". "At any point" has both a spatial and temporal component. Even short durations of interconnections of groundwater and surface water can be crucial for surface water flow and supporting environmental users of groundwater and surface water. The GSP states (p. 4-22): "*Interconnection between surface water and groundwater can vary both in time and space. A seasonal analysis is included in Appendix 4A.*" The appendix was not included in the public draft copy of the GSP, however.

RECOMMENDATIONS

- Describe available groundwater elevation data and stream flow data in the subbasin. ISWs are best analyzed using depth-to-groundwater data from multiple seasons and water year types (e.g., wet, dry, average, drought), to determine the range of depth and capture the variability in environmental conditions inherent in California's climate.

- Overlay the stream reaches shown on Figure 4-9 with depth-to-groundwater contour maps to illustrate groundwater depths and the groundwater gradient near the stream reaches. Show the location of groundwater wells in the subbasin used to create the contour maps.

- For the depth-to-groundwater contour maps, use the best practices presented in Attachment D. Specifically, ensure that the first step is contouring groundwater elevations, and then subtracting this layer from land surface elevations from a Digital Elevation Model (DEM) to estimate depth-to-groundwater contours across the landscape. This will provide accurate contours of depth to groundwater along streams and other land surface depressions where GDEs are commonly found.

- On Figure 4-9 (Locations of Interconnected Surface Water), consider any modelled stream grid cells with >0% connection to groundwater as potential ISWs until more data is available. In other words, consider any stream cell with connection to groundwater for any length of time as a potential ISW.

- Describe data gaps for the ISW analysis. Reconcile these data gaps with specific measures (shallow monitoring wells, stream gauges, and nested/clustered wells) along surface water features in the Monitoring Network section of the GSP.

Groundwater Dependent Ecosystems

The identification of Groundwater Dependent Ecosystems (GDEs) is **insufficient**, due to a lack of comprehensive, systematic analysis of the subbasin's GDEs.

The GSP took initial steps to identify and map GDEs using the Natural Communities Commonly Associated with Groundwater dataset (NC dataset) and other sources. The GSP does not discuss how the NC dataset was verified with the use of groundwater data, however. The GSP states (p. 4-27): *"The SVBGSA reviewed the NCCAG dataset and assessed each GDE's potential connection to groundwater by determining if the GDE was underlain by shallow groundwater that has been delineated as being part of a Bulletin 118 principal aquifer, and if depth to groundwater is less than 30 feet."* However, no further details are provided in the GSP. Based on the description provided in the GSP, it is unclear if Figure 4-10 (Groundwater Dependent Ecosystems) presents the entire NC dataset, or further analysis based on the 30 feet threshold as described in the text. Without an analysis of groundwater data to verify the NC dataset polygons, it will be difficult or impossible to adequately monitor and manage the subbasin's GDEs throughout GSP implementation.

We commend the GSA for listing the threatened and endangered species likely to depend on groundwater, as determined from several sources including the US Fish and Wildlife Service (USFWS) website, California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), and TNC Critical Species LookBook (Table 4-1). Vegetation species present in the subbasin's potential GDEs were not included in the GSP, however.

RECOMMENDATIONS

- Develop and describe a systematic approach for analyzing the subbasin's GDEs. For example, provide a map of the NC Dataset. On the map, label polygons retained, removed, or added to/from the NC dataset (include the removal reason if polygons are not considered potential GDEs, or include the data source if polygons are added). Discuss how local groundwater data was used to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer. Refer to Attachment D of this letter for best practices for using local groundwater data to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer.

- Use depth-to-groundwater data from multiple seasons and water year types (e.g., wet, dry, average, drought) to determine the range of depth to groundwater around NC dataset polygons. We recommend that a baseline period (10 years from 2005 to 2015) be established to characterize groundwater conditions over multiple water year types. Refer to Attachment D of this letter for best practices for using local groundwater data to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer.

- Refer to Attachment B for more information on TNC's plant rooting depth database. Deeper thresholds are necessary for plants that have reported maximum root depths that exceed the averaged 30-ft threshold, such as valley oak (*Quercus lobata*). We recommend that the reported max rooting depth for these deeper-rooted plants be used. For example, a depth-to-groundwater threshold of 80 feet should be used instead of the 30-ft threshold, when verifying whether valley oak polygons from the NC Dataset are connected to groundwater. It is important to re-emphasize that actual rooting depth data are limited and will depend on the plant species and site-specific conditions such as soil and aquifer types, and availability to other water sources.

- Provide depth-to-groundwater contour maps, noting the best practices presented in Attachment D. Specifically, ensure that the first step is contouring groundwater elevations, and then subtracting this layer from land surface elevations from a digital elevation model (DEM) to estimate depth-to-groundwater contours across the landscape.

- If insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons as "Potential GDEs" in the GSP until data gaps are reconciled in the monitoring network.

- Please provide a complete inventory, map, or description of fauna (e.g., birds, fish, amphibian) and flora (e.g., plants) species in the subbasin (see Attachment C of this letter for a list of freshwater species located in the Eastside Subbasin).

Native Vegetation and Managed Wetlands

Native vegetation and managed wetlands are water use sectors that are required[1,2] to be included in the water budget. The integration of native vegetation and managed wetlands into the water budget is **insufficient**. The water budget includes a separate item for evapotranspiration, but combines crop and riparian evapotranspiration into one term. The GSP states (p. 2-2): *"Environmental users include native vegetation and managed wetlands."* Managed wetlands are not mentioned further in the GSP and are not included in the water budgets, however. The omission of explicit water demands for native vegetation and managed wetlands is problematic because key environmental uses of groundwater are not being accounted for as water supply decisions are made using this budget, nor will they likely be considered in project and management actions.

RECOMMENDATION

- Quantify and present all water use sector demands in the historical, current, and projected water budgets with individual line items for each water use sector, including native vegetation and managed wetlands.

B. Engaging Stakeholders

Stakeholder Engagement during GSP development

Stakeholder engagement during GSP development is **incomplete**. SGMA's requirement for public notice and engagement of stakeholders[3] is not fully met by the description in the Communication and Public Engagement section of the GSP (Chapter 2).

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[1] "'Water use sector' refers to categories of water demand based on the general land uses to which the water is applied, including urban, industrial, agricultural, managed wetlands, managed recharge, and native vegetation." [23 CCR §351(al)]

[2] "The water budget shall quantify the following, either through direct measurements or estimates based on data: (3) Outflows from the groundwater system by water use sector, including evapotranspiration, groundwater extraction, groundwater discharge to surface water sources, and subsurface groundwater outflow." [23 CCR §354.18]

[3] "A communication section of the Plan shall include a requirement that the GSP identify how it encourages the active involvement of diverse social, cultural, and economic elements of the population within the basin." [23 CCR §354.10(d)(3)]

The GSA's outreach activities include conducting interviews with DAC community leaders to identify strategies to work together during GSP planning and implementation; conducting workshops with partners on water and groundwater sustainability; identifying concerns from DACs and underrepresented communities; planning listening sessions around GSA milestones; developing a resource hub with partner organizations; identifying community allies to partner with in reducing barriers to participation from DACs; and planning to convene a working group on domestic water that includes DACs and underrepresented communities. However, there is no specific pathway for feedback from DAC residents and representatives to be considered and included in the GSP and its implementation.

We note additional deficiencies with the overall stakeholder engagement process. While environmental organizations have a representative serving on the board of directors and are listed as stakeholders and as members of the GSP Advisory Committee, there is no specific outreach described that is directly targeted to environmental stakeholders during the GSP development and implementation processes.

RECOMMENDATIONS
● In the Communication and Public Engagement Plan, describe active and targeted outreach to engage environmental stakeholders during the remainder of the GSP development process and throughout the GSP implementation phase. Refer to Attachment B for specific recommendations on how to actively engage stakeholders during all phases of the GSP process. ● DAC and environmental stakeholder engagement should be improved by incorporating feedback and recommendations from DAC and environmental stakeholders engaged in the GSP process.

C. Considering Beneficial Uses and Users When Establishing Sustainable Management Criteria and Analyzing Impacts on Beneficial Uses and Users

The consideration of beneficial uses and users when establishing sustainable management criteria (SMC) is **insufficient**. The consideration of potential impacts on all beneficial users of groundwater in the basin are required when defining undesirable results[4] and establishing minimum thresholds.[5,6]

Disadvantaged Communities and Drinking Water Users

For chronic lowering of groundwater levels, the GSP discusses minimum thresholds impact on domestic wells (Section 8.6.2.2). The GSP states (p. 8-14): "*The analysis of domestic wells showed that in the Eastside Aquifer all domestic wells will have at least 25 feet of water in them as long as groundwater elevations remain above minimum thresholds*." However, the analysis was only based on 20 wells out of the total 206 domestic wells in the OSWCR database.

[4] "The description of undesirable results shall include [...] potential effects on the beneficial uses and users of groundwater, on land uses and property interests, and other potential effects that may occur or are occurring from undesirable results." [23 CCR §354.26(b)(3)]
[5] "The description of minimum thresholds shall include [...] how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests." [23 CCR §354.28(b)(4)]
[6] "The description of minimum thresholds shall include [...] how state, federal, or local standards relate to the relevant sustainability indicator. If the minimum threshold differs from other regulatory standards, the agency shall explain the nature of and the basis for the difference." [23 CCR §354.28(b)(5)]

Furthemore, the GSP states (p. 8-14): "*Some domestic wells may draw water from shallow, perched groundwater that is not managed in this GSP.*" The GSP states (p. 5-43): "*The Eastside Subbasin is considered a single aquifer with two generalized water-bearing zones*." The shallow perched zones are part of the single aquifer system and are still governed by the requirements of SGMA.

Section 8.6.4 defines undesirable results for the chronic lowering of groundwater level SMC. The GSP states (p. 8-22): *"The chronic lowering of groundwater levels undesirable result is: more than 15% of the groundwater elevation minimum thresholds are exceeded.*" However, undesirable results should inform the development of minimum thresholds, not the other way around. The GSP should establish minimum thresholds at the representative monitoring wells that account for the specific undesirable results the GSA has determined for the subbasin. The current analysis, which only considers 20 out of 206 wells, is insufficient and does not use best available information, for example including Public Land Survey System (PLSS) section location data, as was used in the 180/400 Foot Aquifer GSP.

For degraded water quality, the GSP identifies constituents of concern (COCs) within the subbasin. The GSP states (p. 5-30): "*The SVBGSA does not have regulatory authority over groundwater quality and is not charged with improving groundwater quality in the Salinas Valley Groundwater Basin.*" Table 8-4 provides a list of constituents and number of wells that must exceed regulatory standards in order to trigger minimum thresholds but fails to provide justification for how those numbers were selected. The GSP also sets measurable objectives identical to minimum thresholds; the exceedance of minimum thresholds is supposed to trigger additional actions but since minimum thresholds in this plan are identified as measurable objectives, it is unclear what action is triggered. Furthermore, the regulatory standards are not explicitly provided in the GSP.

RECOMMENDATIONS

Chronic Lowering of Groundwater Levels

- Describe direct and indirect impacts on DACs and drinking water users when defining undesirable results for chronic lowering of groundwater levels. For the analysis of minimum threshold impact on domestic wells, use best available information such as Public Land Survey System (PLSS) section location data.

- Establish minimum thresholds at the representative monitoring wells that account for the specific undesirable results the GSA would like to avoid.

Degraded Water Quality

- Describe direct and indirect impacts on DACs and drinking water users when defining undesirable results for degraded water quality. For specific guidance on how to consider these users, refer to "Guide to Protecting Water Quality Under the Sustainable Groundwater Management Act."[7]

- Set measurable objectives at lower levels than minimum thresholds (i.e., indicative of better water quality).

[7] Guide to Protecting Water Quality under the Sustainable Groundwater Management Act https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1559328858/Guide_to_Protecting_Drinking_Water_Quality_Under_the_Sustainable_Groundwater_Management_Act.pdf?1559328858.

- Set concentration-based minimum thresholds and measurable objectives for COCs in the subbasin that are impacted by groundwater use and/or management. Ensure they align with drinking water standards[8].

- Evaluate the cumulative or indirect impacts of proposed minimum thresholds for degraded water quality on DACs and drinking water users.

<u>Groundwater Dependent Ecosystems and Interconnected Surface Waters</u>
Sustainable management criteria for chronic lowering of groundwater levels provided in the GSP do not consider potential impacts to environmental beneficial users. The GSP neither describes nor analyzes direct or indirect impacts on environmental users of groundwater when defining undesirable results. This is problematic because without identifying potential impacts to GDEs, minimum thresholds may compromise, or even destroy, these environmental beneficial users. Since GDEs are present in the subbasin, they must be considered when developing SMC.

Sustainable management criteria for depletion of interconnected surface water are established by proxy using shallow groundwater elevations observed in 2015 near locations of interconnected surface water. To describe impacts to ecological surface water users, the GSP states (p. 8-50): "*There are no known flow prescriptions on any surface water bodies in the Subbasin. Therefore, the current level of depletion has not violated any ecological flow requirements. This is not meant to imply that depletions do not impact potential species living in or near surface water bodies in the Subbasin. However, any impacts that may be occurring have not risen to the level that triggers regulatory intervention. Therefore, the impacts from current rates of depletion on ecological surface water users is not unreasonable."* The GSP makes no attempt to evaluate the impacts of the proposed minimum threshold on environmental beneficial users of surface water. The GSP does not explain how the chosen minimum thresholds and measurable objectives avoid significant and unreasonable effects on surface water beneficial users in the subbasin, such as increased mortality and inability to perform key life processes (e.g., reproduction, migration).

RECOMMENDATIONS

- When defining undesirable results for chronic lowering of groundwater levels, provide specifics on what biological responses (e.g., extent of habitat, growth, recruitment rates) would best characterize a significant and unreasonable impact to GDEs. Undesirable results to environmental users occur when 'significant and unreasonable' effects on beneficial users are caused by one of the sustainability indicators (i.e., chronic lowering of groundwater levels, degraded water quality, or depletion of interconnected surface water). Thus, potential impacts on environmental beneficial uses and users need to be considered when defining undesirable results[9] in the subbasin. Defining undesirable results is the crucial first step before the minimum thresholds[10] can be determined.

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[8] "Degraded Water Quality [...] collect sufficient spatial and temporal data from each applicable principal aquifer to determine groundwater quality trends for water quality indicators, as determined by the Agency, to address known water quality issues." [23 CCR §354.34(c)(4)]

[9] "The description of undesirable results shall include [...] potential effects on the beneficial uses and users of groundwater, on land uses and property interests, and other potential effects that may occur or are occurring from undesirable results". [23 CCR §354.26(b)(3)]

[10] The description of minimum thresholds shall include [...] how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests." [23 CCR §354.28(b)(4)]

- When defining undesirable results for depletion of interconnected surface water, include a description of potential impacts on instream habitats within ISWs when minimum thresholds in the subbasin are reached[11]. The GSP should confirm that minimum thresholds for ISWs avoid adverse impacts to environmental beneficial users of interconnected surface waters as these environmental users could be left unprotected by the GSP. These recommendations apply especially to environmental beneficial users that are already protected under pre-existing state or federal law[6,12].

2. Climate Change

The SGMA statute identifies climate change as a significant threat to groundwater resources and one that must be examined and incorporated in the GSPs. The GSP Regulations[13] require integration of climate change into the projected water budget to ensure that projects and management actions sufficiently account for the range of potential climate futures.

The integration of climate change into the projected water budget is **insufficient**. The GSP does incorporate climate change into the projected water budget using DWR change factors for 2030 and 2070. However, the GSP does not consider multiple climate scenarios (e.g., the 2070 extremely wet and extremely dry climate scenarios) in the projected water budget. The GSP should clearly and transparently incorporate the extremely wet and dry scenarios provided by DWR into projected water budgets or select more appropriate extreme scenarios for their basins. While these extreme scenarios may have a lower likelihood of occurring, their consequences could be significant, therefore they should be included in groundwater planning.

We acknowledge and commend the inclusion of climate change into key inputs (e.g., precipitation, evapotranspiration, surface water flow, and sea level) of the projected water budget. However, the GSP does not calculate a sustainable yield based on the projected water budget with climate change incorporated. If the water budgets are incomplete, including the omission of extremely wet and dry scenarios, and sustainable yield is not calculated based on climate change projections, then there is increased uncertainty in virtually every subsequent calculation used to plan for projects, derive measurable objectives, and set minimum thresholds. Plans that do not adequately include climate change projections may underestimate future impacts on vulnerable beneficial users of groundwater such as ecosystems, DACs, and domestic well owners.

[11] "The minimum threshold for depletions of interconnected surface water shall be the rate or volume of surface water depletions caused by groundwater use that has adverse impacts on beneficial uses of the surface water and may lead to undesirable results." [23 CCR §354.28(c)(6)]

[12] Rohde MM, Seapy B, Rogers R, Castañeda X, editors. 2019. Critical Species LookBook: A compendium of California's threatened and endangered species for sustainable groundwater management. The Nature Conservancy, San Francisco, California. Available at: https://groundwaterresourcehub.org/public/uploads/pdfs/Critical_Species_LookBook_91819.pdf

[13] "Each Plan shall rely on the best available information and best available science to quantify the water budget for the basin in order to provide an understanding of historical and projected hydrology, water demand, water supply, land use, population, climate change, sea level rise, groundwater and surface water interaction, and subsurface groundwater flow." [23 CCR §354.18(e)]

RECOMMENDATIONS

- Integrate climate change, including extremely wet and dry scenarios, into all elements of the projected water budget to form the basis for development of sustainable management criteria and projects and management actions.
- Calculate sustainable yield based on the projected water budget with climate change incorporated.
- Incorporate climate change scenarios into projects and management actions.

3. Data Gaps

The consideration of beneficial users when establishing monitoring networks is **insufficient**, due to lack of specific plans to increase the Representative Monitoring Sites (RMSs) in the monitoring network that represent shallow groundwater elevations around DACs, domestic wells, GDEs, and ISWs in the subbasin. The monitoring network that represents water quality conditions around DACs and domestic wells in the subbasin is sufficient in terms of spatial distribution but is insufficient in terms of depth representation.

Figure 7-1 (Eastside Aquifer Monitoring Network for Groundwater Levels) shows that no monitoring wells are located across portions of the subbasin near DACs and domestic wells. The GSP states (p. 7-18): "*There are no data gaps in the ISW monitoring network in the Eastside Subbasin*." However, the GSP states (p. 5-43): "*There is no data that verifies the location and extent of surface water connection to groundwater, nor the extent to which groundwater extraction depletes surface water*." These two sentences appear to directly contradict each other. Beneficial users of groundwater may remain unprotected by the GSP without adequate monitoring and identification of data gaps in the shallow aquifer. The Plan therefore fails to meet SGMA's requirements for the monitoring network[14].

RECOMMENDATIONS

- Provide maps that overlay monitoring well locations with the locations of DACs, domestic wells, GDEs, and ISWs to clearly identify potentially impacted areas. Increase the number of representative monitoring sites (RMSs) in the shallow aquifer across the subbasin for the groundwater elevation and groundwater quality condition indicators. Prioritize proximity to DACs, domestic wells, GDEs, and ISWs when identifying new RMSs.
- Provide specific plans to fill data gaps in the monitoring network for GDEs and ISWs. Evaluate how the gathered data will be used to identify and map GDEs and ISWs.
- Describe biological monitoring that can be used to assess the potential for significant and unreasonable impacts to GDEs or ISWs due to groundwater conditions in the subbasin.

[14] "The monitoring network objectives shall be implemented to accomplish the following: [...] (2) Monitor impacts to the beneficial uses or users of groundwater." [23 CCR §354.34(b)(2)]

- Ensure groundwater elevation and water quality RMSs are tracking groundwater conditions spatially and at the correct depth for *all* beneficial users - especially DACs, domestic wells, GDEs, and ISWs. Groundwater elevation and quality RMS data gaps (spatial and depth) in relation to key beneficial users in the subbasin are provided in Attachment E.

4. Addressing Beneficial Users in Projects and Management Actions

The consideration of beneficial users when developing projects and management actions is **insufficient**, due to the failure to completely identify benefits or impacts of identified projects and management actions to key beneficial users of groundwater such as GDEs, aquatic habitats, surface water users, DACs, and drinking water users. Therefore, potential project and management actions may not protect these beneficial users. Groundwater sustainability under SGMA is defined not just by sustainable yield, but by the avoidance of undesirable results for *all* beneficial users.

In Section 9.5.3 (Implementation Action G3: Dry Well Notification System), the GSP states (p. 9-100): "*The GSA could develop or support the development of a program to assist well owners (domestic or state small and local small water systems) whose wells go dry due to declining groundwater elevations.*" The GSP states that the program could involve a notification system, monitoring triggered by lowered groundwater elevations, public outreach, "*...referral to assistance with short-term supply solutions, technical assistance to assess why it went dry, and/or long-term supply solutions*." No further specifics on a drinking water well impact mitigation program are provided, however.

RECOMMENDATIONS

- For DACs and domestic well owners, provide specific plans for implementation of a drinking water well impact mitigation program to proactively monitor and protect drinking water wells through GSP implementation. Refer to Attachment B for specific recommendations on how to implement a drinking water well mitigation program.

- For DACs and domestic well owners, include a discussion of whether potential impacts to water quality from projects and management actions could occur and how the GSA plans to mitigate such impacts.

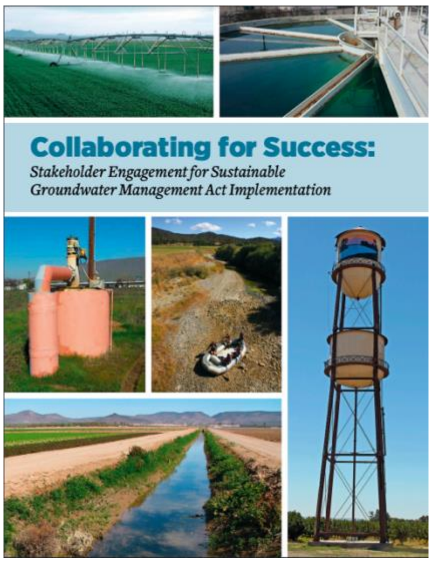
- Recharge ponds, reservoirs, and facilities for managed stormwater recharge can be designed as multiple-benefit projects to include elements that act functionally as wetlands and provide a benefit for wildlife and aquatic species. For guidance on how to integrate multi-benefit recharge projects into your GSP, refer to the "Multi-Benefit Recharge Project Methodology Guidance Document"[15].

- Develop management actions that incorporate climate and water delivery uncertainties to address future water demand and prevent future undesirable results.

[15] The Nature Conservancy. 2021. Multi-Benefit Recharge Project Methodology for Inclusion in Groundwater Sustainability Plans. Sacramento. Available at: https://groundwaterresourcehub.org/sgma-tools/multi-benefit-recharge-project-methodology-guidance/

Attachment B
SGMA Tools to address DAC, drinking water, and environmental beneficial uses and users

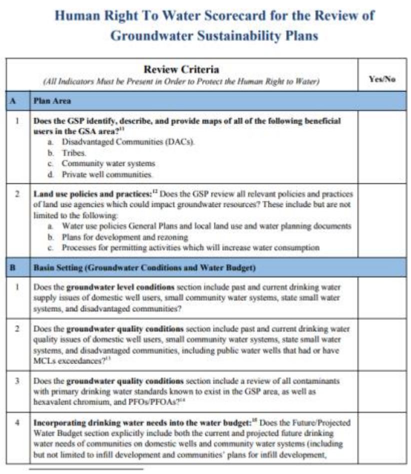
Stakeholder Engagement and Outreach



Clean Water Action, Community Water Center and Union of Concerned Scientists developed a guidance document called Collaborating for success: Stakeholder engagement for Sustainable Groundwater Management Act Implementation. It provides details on how to conduct targeted and broad outreach and engagement during Groundwater Sustainability Plan (GSP) development and implementation. Conducting a targeted outreach involves:

- Developing a robust Stakeholder Communication and Engagement plan that includes outreach at frequented locations (schools, farmers markets, religious settings, events) across the plan area to increase the involvement and participation of disadvantaged communities, drinking water users and the environmental stakeholders.
- Providing translation services during meetings and technical assistance to enable easy participation for non-English speaking stakeholders.
- GSP should adequately describe the process for requesting input from beneficial users and provide details on how input is incorporated into the GSP.

The Human Right to Water

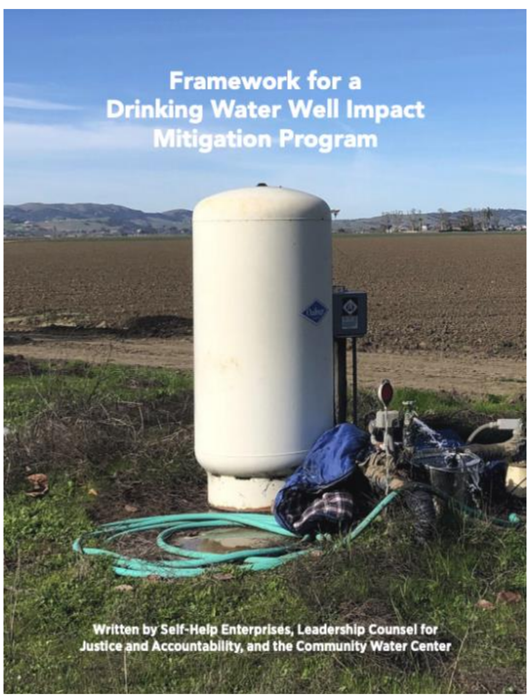


Human Right To Water Scorecard for the Review of Groundwater Sustainability Plans

	Review Criteria *(All Indicators Must be Present in Order to Protect the Human Right to Water)*	**Yes/No**
A	**Plan Area**	
1	**Does the GSP identify, describe, and provide maps of all of the following beneficial users in the GSA area?**[11] a. Disadvantaged Communities (DACs). b. Tribes. c. Community water systems d. Private well communities.	
2	**Land use policies and practices:**[12] Does the GSP review all relevant policies and practices of land use agencies which could impact groundwater resources? These include but are not limited to the following: a. Water use policies General Plans and local land use and water planning documents b. Plans for development and rezoning c. Processes for permitting activities which will increase water consumption	
B	**Basin Setting (Groundwater Conditions and Water Budget)**	
1	Does the **groundwater level conditions** section include past and current drinking water supply issues of domestic well users, small community water systems, state small water systems, and disadvantaged communities?	
2	Does the **groundwater quality conditions** section include past and current drinking water quality issues of domestic well users, small community water systems, state small water systems, and disadvantaged communities, including public water wells that had or have MCLs exceedances?[13]	
3	Does the **groundwater quality conditions** section include a review of all contaminants with primary drinking water standards known to exist in the GSP area, as well as hexavalent chromium, and PFOs/PFOAs?[14]	
4	**Incorporating drinking water needs into the water budget:**[15] Does the Future/Projected Water Budget section explicitly include both the current and projected future drinking water needs of communities on domestic wells and community water systems (including but not limited to infill development and communities' plans for infill development,	

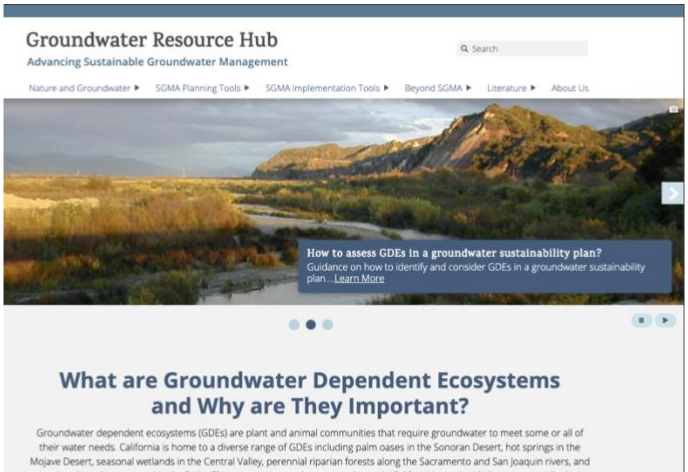
The [Human Right to Water Scorecard](#) was developed by Community Water Center, Leadership Counsel for Justice and Accountability and Self Help Enterprises to aid Groundwater Sustainability Agencies (GSAs) in prioritizing drinking water needs in SGMA. The scorecard identifies elements that must exist in GSPs to adequately protect the Human Right to Drinking water.

Drinking Water Well Impact Mitigation Framework



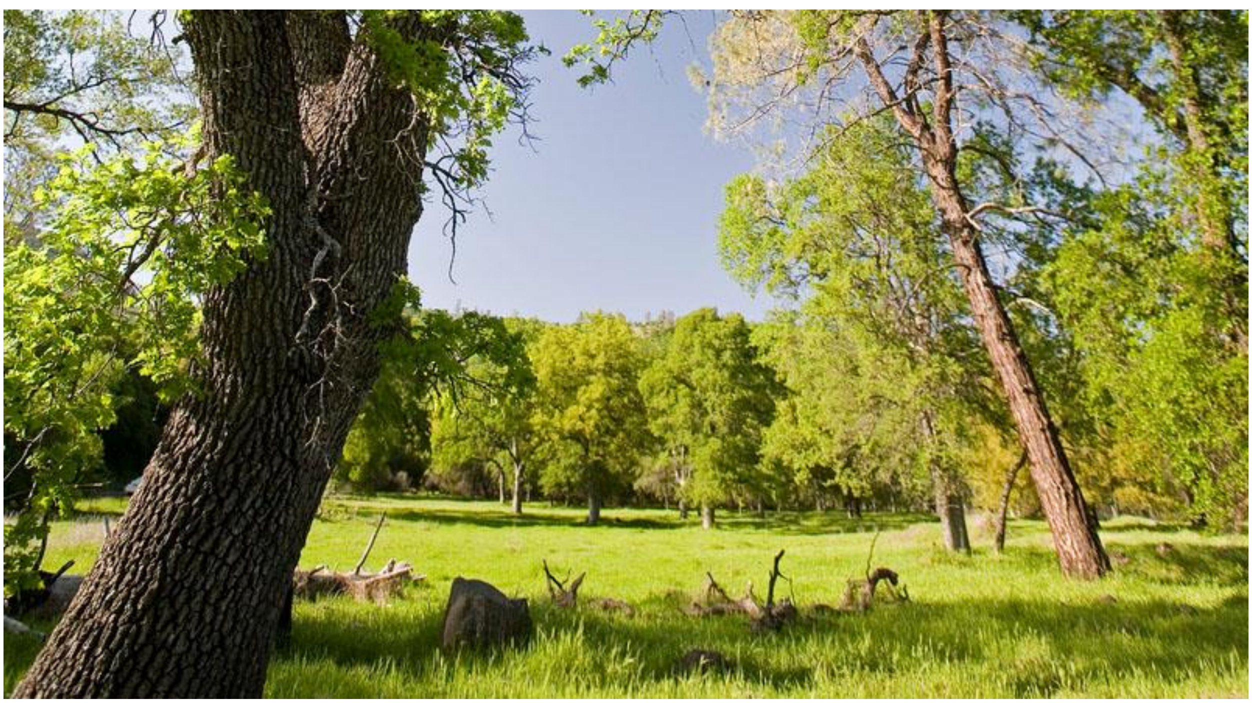
The Drinking Water Well Impact Mitigation Framework was developed by Community Water Center, Leadership Counsel for Justice and Accountability and Self Help Enterprises to aid GSAs in the development and implementation of their GSPs. The framework provides a clear roadmap for how a GSA can best structure its data gathering, monitoring network and management actions to proactively monitor and protect drinking water wells and mitigate impacts should they occur.

Groundwater Resource Hub



The Nature Conservancy has developed a suite of tools based on best available science to help GSAs, consultants, and stakeholders efficiently incorporate nature into GSPs. These tools and resources are available online at GroundwaterResourceHub.org. The Nature Conservancy's tools and resources are intended to reduce costs, shorten timelines, and increase benefits for both people and nature.

Rooting Depth Database



The Plant Rooting Depth Database provides information that can help assess whether groundwater-dependent vegetation are accessing groundwater. Actual rooting depths will depend on the plant species and site-specific conditions, such as soil type and availability of other water sources. Site-specific knowledge of depth to groundwater combined with rooting depths will help provide an understanding of the potential groundwater levels are needed to sustain GDEs.

How to use the database

The maximum rooting depth information in the Plant Rooting Depth Database is useful when verifying whether vegetation in the Natural Communities Commonly Associated with Groundwater (NC Dataset) are connected to groundwater. A 30 ft depth-to-groundwater threshold, which is based on averaged global rooting depth data for phreatophytes[1], is relevant for most plants identified in the NC Dataset since most plants have a max rooting depth of less than 30 feet. However, it is important to note that deeper thresholds are necessary for other plants that have reported maximum root depths that exceed the averaged 30 feet threshold, such as valley oak (*Quercus lobata*), Euphrates poplar (*Populus euphratica*), salt cedar (*Tamarix spp.*), and shadescale (*Atriplex confertifolia*). The Nature Conservancy advises that the reported max rooting depth for these deeper-rooted plants be used. For example, a depth-to groundwater threshold of 80 feet should be used instead of the 30 ft threshold, when verifying whether valley oak polygons from the NC Dataset are connected to groundwater. It is important to re-emphasize that actual rooting depth data are limited and will depend on the plant species and site-specific conditions such as soil and aquifer types, and availability to other water sources.

The Plant Rooting Depth Database is an Excel workbook composed of four worksheets:

1. California phreatophyte rooting depth data (included in the NC Dataset)
2. Global phreatophyte rooting depth data
3. Metadata
4. References

How the database was compiled

The Plant Rooting Depth Database is a compilation of rooting depth information for the groundwater-dependent plant species identified in the NC Dataset. Rooting depth data were compiled from published scientific literature and expert opinion through a crowdsourcing campaign. As more information becomes available, the database of rooting depths will be updated. Please Contact Us if you have additional rooting depth data for California phreatophytes.

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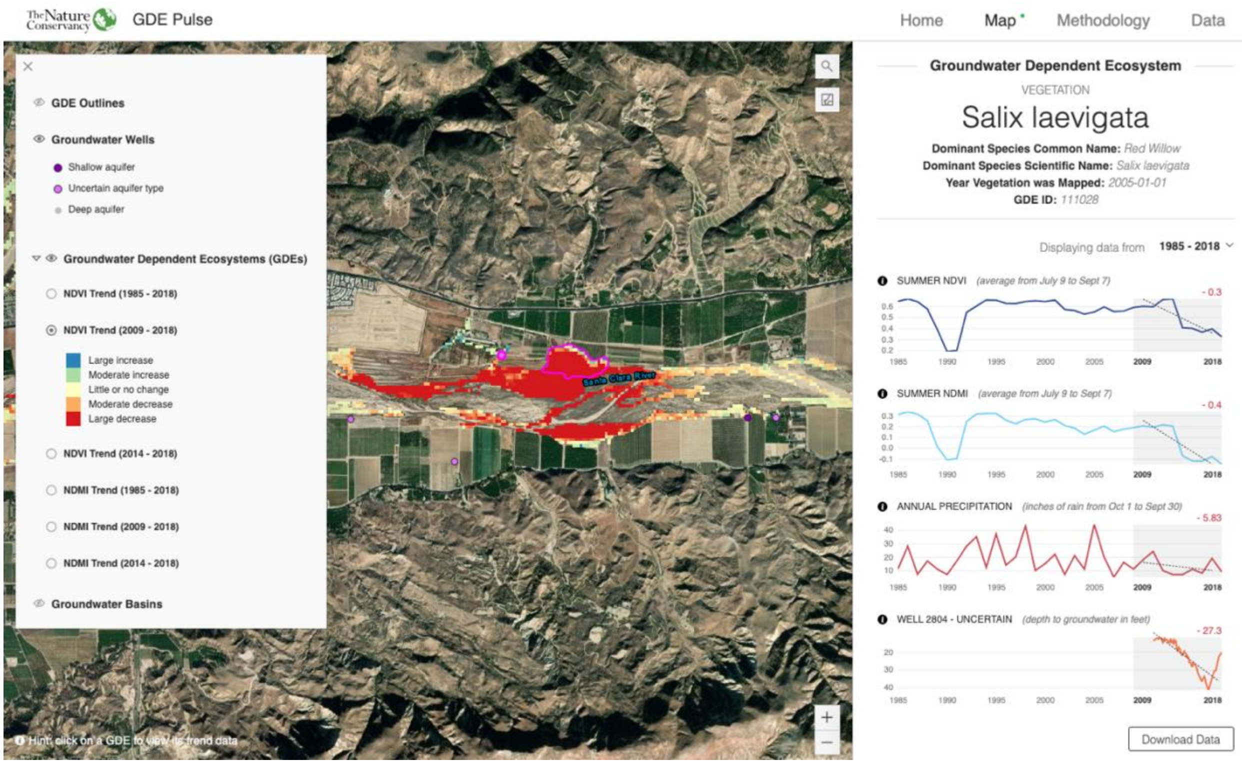
[1] Canadell, J., Jackson, R.B., Ehleringer, J.B. et al. 1996. Maximum rooting depth of vegetation types at the global scale. Oecologia 108, 583–595. https://doi.org/10.1007/BF00329030

GDE Pulse



GDE Pulse is a free online tool that allows Groundwater Sustainability Agencies to assess changes in groundwater dependent ecosystem (GDE) health using satellite, rainfall, and groundwater data. Remote sensing data from satellites has been used to monitor the health of vegetation all over the planet. GDE pulse has compiled 35 years of satellite imagery from NASA's Landsat mission for every polygon in the Natural Communities Commonly Associated with Groundwater Dataset. The following datasets are available for downloading:

Normalized Difference Vegetation Index (NDVI) is a satellite-derived index that represents the greenness of vegetation. Healthy green vegetation tends to have a higher NDVI, while dead leaves have a lower NDVI. We calculated the average NDVI during the driest part of the year (July - Sept) to estimate vegetation health when the plants are most likely dependent on groundwater.

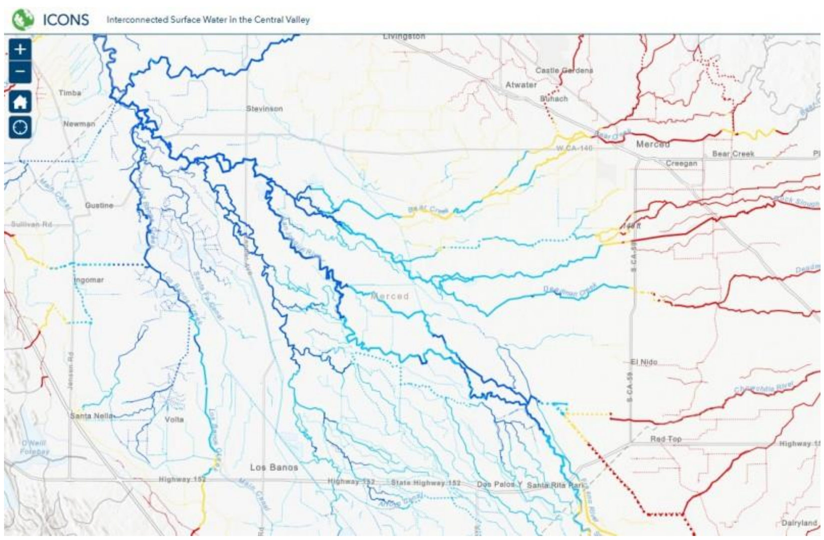
Normalized Difference Moisture Index (NDMI) is a satellite-derived index that represents water content in vegetation. NDMI is derived from the Near-Infrared (NIR) and Short-Wave Infrared (SWIR) channels. Vegetation with adequate access to water tends to have higher NDMI, while vegetation that is water stressed tends to have lower NDMI. We calculated the average NDVI during the driest part of the year (July–September) to estimate vegetation health when the plants are most likely dependent on groundwater.

Annual Precipitation is the total precipitation for the water year (October 1st – September 30th) from the PRISM dataset. The amount of local precipitation can affect vegetation with more precipitation generally leading to higher NDVI and NDMI.

Depth to Groundwater measurements provide an indication of the groundwater levels and changes over time for the surrounding area. We used groundwater well measurements from nearby (<1km) wells to estimate the depth to groundwater below the GDE based on the average elevation of the GDE (using a digital elevation model) minus the measured groundwater surface elevation.

ICONOS Mapper

Interconnected Surface Water in the Central Valley



[ICONS](#) maps the likely presence of interconnected surface water (ISW) in the Central Valley using depth to groundwater data. Using data from 2011-2018, the ISW dataset represents the likely connection between surface water and groundwater for rivers and streams in California’s Central Valley. It includes information on the mean, maximum, and minimum depth to groundwater for each stream segment over the years with available data, as well as the likely presence of ISW based on the minimum depth to groundwater. The Nature Conservancy developed this database, with guidance and input from expert academics, consultants, and state agencies.

We developed this dataset using groundwater elevation data [available online](#) from the California Department of Water Resources (DWR). DWR only provides this data for the Central Valley. For GSAs outside of the valley, who have groundwater well measurements, we recommend following our methods to determine likely ISW in your region. The Nature Conservancy’s ISW dataset should be used as a first step in reviewing ISW and should be supplemented with local or more recent groundwater depth data.

Attachment C

Freshwater Species Located in the Eastside Aquifer Subbasin

To assist in identifying the beneficial users of surface water necessary to assess the undesirable result "depletion of interconnected surface waters", Attachment C provides a list of freshwater species located in the Eastside Aquifer Subbasin. To produce the freshwater species list, we used ArcGIS to select features within the California Freshwater Species Database version 2.0.9 within the basin boundary. This database contains information on ~4,000 vertebrates, macroinvertebrates and vascular plants that depend on fresh water for at least one stage of their life cycle. The methods used to compile the California Freshwater Species Database can be found in Howard et al. 2015[1]. The spatial database contains locality observations and/or distribution information from ~400 data sources. The database is housed in the California Department of Fish and Wildlife's BIOS[2] as well as on The Nature Conservancy's science website[3].

Scientific Name	Common Name	Legal Protected Status		
		Federal	State	Other
BIRDS				
Agelaius tricolor	Tricolored Blackbird	Bird of Conservation Concern	Special Concern	BSSC - First priority
Actitis macularius	Spotted Sandpiper			
Aechmophorus clarkii	Clark's Grebe			
Aechmophorus occidentalis	Western Grebe			
Aix sponsa	Wood Duck			
Anas acuta	Northern Pintail			
Anas clypeata	Northern Shoveler			
Anas crecca	Green-winged Teal			
Anas cyanoptera	Cinnamon Teal			
Anas discors	Blue-winged Teal			
Anas platyrhynchos	Mallard			
Anas strepera	Gadwall			
Anser albifrons	Greater White-fronted Goose			
Ardea alba	Great Egret			
Ardea herodias	Great Blue Heron			
Aythya affinis	Lesser Scaup			
Aythya collaris	Ring-necked Duck			
Aythya marila	Greater Scaup			
Aythya valisineria	Canvasback		Special	
Bucephala albeola	Bufflehead			

[1] Howard, J.K. et al. 2015. Patterns of Freshwater Species Richness, Endemism, and Vulnerability in California. PLoSONE, 11(7). Available at: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0130710

[2] California Department of Fish and Wildlife BIOS: https://www.wildlife.ca.gov/data/BIOS

[3] Science for Conservation: https://www.scienceforconservation.org/products/california-freshwater-species-database

Bucephala clangula	Common Goldeneye			
Butorides virescens	Green Heron			
Calidris alpina	Dunlin			
Calidris mauri	Western Sandpiper			
Calidris minutilla	Least Sandpiper			
Chen caerulescens	Snow Goose			
Chen rossii	Ross's Goose			
Chroicocephalus philadelphia	Bonaparte's Gull			
Cistothorus palustris palustris	Marsh Wren			
Cygnus columbianus	Tundra Swan			
Egretta thula	Snowy Egret			
Empidonax traillii	Willow Flycatcher	Bird of Conservation Concern	Endangered	
Fulica americana	American Coot			
Gallinago delicata	Wilson's Snipe			
Himantopus mexicanus	Black-necked Stilt			
Icteria virens	Yellow-breasted Chat		Special Concern	BSSC - Third priority
Limnodromus scolopaceus	Long-billed Dowitcher			
Lophodytes cucullatus	Hooded Merganser			
Megaceryle alcyon	Belted Kingfisher			
Mergus merganser	Common Merganser			
Numenius phaeopus	Whimbrel			
Nycticorax nycticorax	Black-crowned Night-Heron			
Oxyura jamaicensis	Ruddy Duck			
Pelecanus erythrorhynchos	American White Pelican		Special Concern	BSSC - First priority
Phalacrocorax auritus	Double-crested Cormorant			
Phalaropus tricolor	Wilson's Phalarope			
Plegadis chihi	White-faced Ibis		Watch list	
Pluvialis squatarola	Black-bellied Plover			
Podilymbus podiceps	Pied-billed Grebe			
Porzana carolina	Sora			
Rallus limicola	Virginia Rail			
Recurvirostra americana	American Avocet			
Setophaga petechia	Yellow Warbler			BSSC - Second priority
Tachycineta bicolor	Tree Swallow			
Tringa melanoleuca	Greater Yellowlegs			
Tringa solitaria	Solitary Sandpiper			
CRUSTACEANS				

Linderiella occidentalis	California Fairy Shrimp		Special	IUCN - Near Threatened
FISH				
Oncorhynchus mykiss - SCCC	South Central California coast steelhead	Threatened	Special Concern	Vulnerable - Moyle 2013
HERPS				
Actinemys marmorata marmorata	Western Pond Turtle		Special Concern	ARSSC
Ambystoma californiense californiense	California Tiger Salamander	Threatened	Threatened	ARSSC
Anaxyrus boreas boreas	Boreal Toad			
Rana boylii	Foothill Yellow-legged Frog	Under Review in the Candidate or Petition Process	Special Concern	ARSSC
Rana draytonii	California Red-legged Frog	Threatened	Special Concern	ARSSC
Spea hammondii	Western Spadefoot	Under Review in the Candidate or Petition Process	Special Concern	ARSSC
Thamnophis hammondii hammondii	Two-striped Gartersnake		Special Concern	ARSSC
Thamnophis sirtalis sirtalis	Common Gartersnake			
MAMMALS				
Castor canadensis	American Beaver			Not on any status lists

Attachment D

The Nature Conservancy

July 2019

IDENTIFYING GDEs UNDER SGMA
Best Practices for using the NC Dataset

The Sustainable Groundwater Management Act (SGMA) requires that groundwater dependent ecosystems (GDEs) be identified in Groundwater Sustainability Plans (GSPs). As a starting point, the Department of Water Resources (DWR) is providing the Natural Communities Commonly Associated with Groundwater Dataset (NC Dataset) online[1] to help Groundwater Sustainability Agencies (GSAs), consultants, and stakeholders identify GDEs within individual groundwater basins. To apply information from the NC Dataset to local areas, GSAs should combine it with the best available science on local hydrology, geology, and groundwater levels to verify whether polygons in the NC dataset are likely supported by groundwater in an aquifer (Figure 1)[2]. This document highlights six best practices for using local groundwater data to confirm whether mapped features in the NC dataset are supported by groundwater.

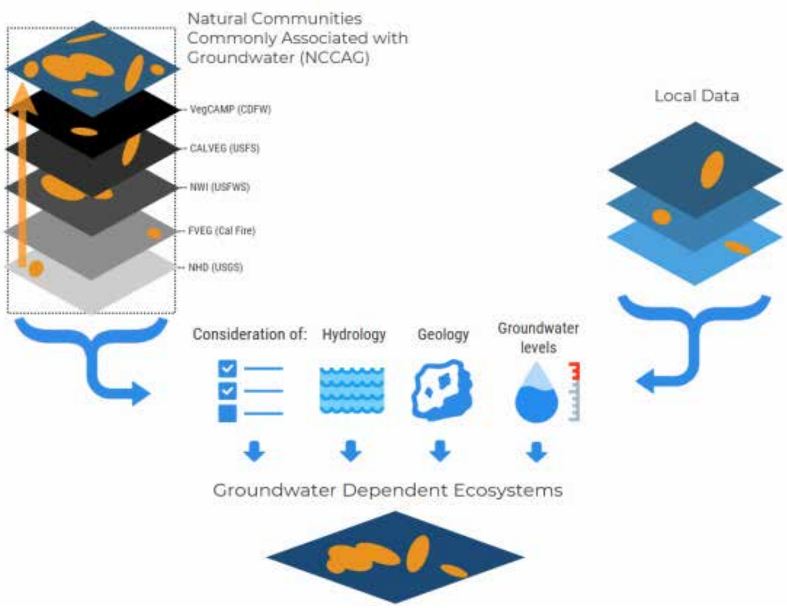


Figure 1. Considerations for GDE identification.
Source: DWR[2]

[1] NC Dataset Online Viewer: https://gis.water.ca.gov/app/NCDatasetViewer/
[2] California Department of Water Resources (DWR). 2018. Summary of the "Natural Communities Commonly Associated with Groundwater" Dataset and Online Web Viewer. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Data-and-Tools/Files/Statewide-Reports/Natural-Communities-Dataset-Summary-Document.pdf

The NC Dataset identifies vegetation and wetland features that are good indicators of a GDE. The dataset is comprised of 48 publicly available state and federal datasets that map vegetation, wetlands, springs, and seeps commonly associated with groundwater in California[3]. It was developed through a collaboration between DWR, the Department of Fish and Wildlife, and The Nature Conservancy (TNC). TNC has also provided detailed guidance on identifying GDEs from the NC dataset[4] on the Groundwater Resource Hub[5], a website dedicated to GDEs.

BEST PRACTICE #1. Establishing a Connection to Groundwater

Groundwater basins can be comprised of one continuous aquifer (Figure 2a) or multiple aquifers stacked on top of each other (Figure 2b). In unconfined aquifers (Figure 2a), using the depth-to-groundwater and the rooting depth of the vegetation is a reasonable method to infer groundwater dependence for GDEs. If groundwater is well below the rooting (and capillary) zone of the plants and any wetland features, the ecosystem is considered disconnected and groundwater management is not likely to affect the ecosystem (Figure 2d). However, it is important to consider local conditions (e.g., soil type, groundwater flow gradients, and aquifer parameters) and to review groundwater depth data from multiple seasons and water year types (wet and dry) because intermittent periods of high groundwater levels can replenish perched clay lenses that serve as the water source for GDEs (Figure 2c). Maintaining these natural groundwater fluctuations are important to sustaining GDE health.

Basins with a stacked series of aquifers (Figure 2b) may have varying levels of pumping across aquifers in the basin, depending on the production capacity or water quality associated with each aquifer. If pumping is concentrated in deeper aquifers, SGMA still requires GSAs to sustainably manage groundwater resources in shallow aquifers, such as perched aquifers, that support springs, surface water, domestic wells, and GDEs (Figure 2). This is because vertical groundwater gradients across aquifers may result in pumping from deeper aquifers to cause adverse impacts onto beneficial users reliant on shallow aquifers or interconnected surface water. The goal of SGMA is to sustainably manage groundwater resources for current and future social, economic, and environmental benefits. While groundwater pumping may not be currently occurring in a shallower aquifer, use of this water may become more appealing and economically viable in future years as pumping restrictions are placed on the deeper production aquifers in the basin to meet the sustainable yield and criteria. Thus, identifying GDEs in the basin should done irrespective to the amount of current pumping occurring in a particular aquifer, so that future impacts on GDEs due to new production can be avoided. A good rule of thumb to follow is: *if groundwater can be pumped from a well - it's an aquifer*.

[3] For more details on the mapping methods, refer to: Klausmeyer, K., J. Howard, T. Keeler-Wolf, K. Davis-Fadtke, R. Hull, A. Lyons. 2018. Mapping Indicators of Groundwater Dependent Ecosystems in California: Methods Report. San Francisco, California. Available at: https://groundwaterresourcehub.org/public/uploads/pdfs/iGDE_data_paper_20180423.pdf
[4] "Groundwater Dependent Ecosystems under the Sustainable Groundwater Management Act: Guidance for Preparing Groundwater Sustainability Plans" is available at: https://groundwaterresourcehub.org/gde-tools/gsp-guidance-document/
[5] The Groundwater Resource Hub: www.GroundwaterResourceHub.org

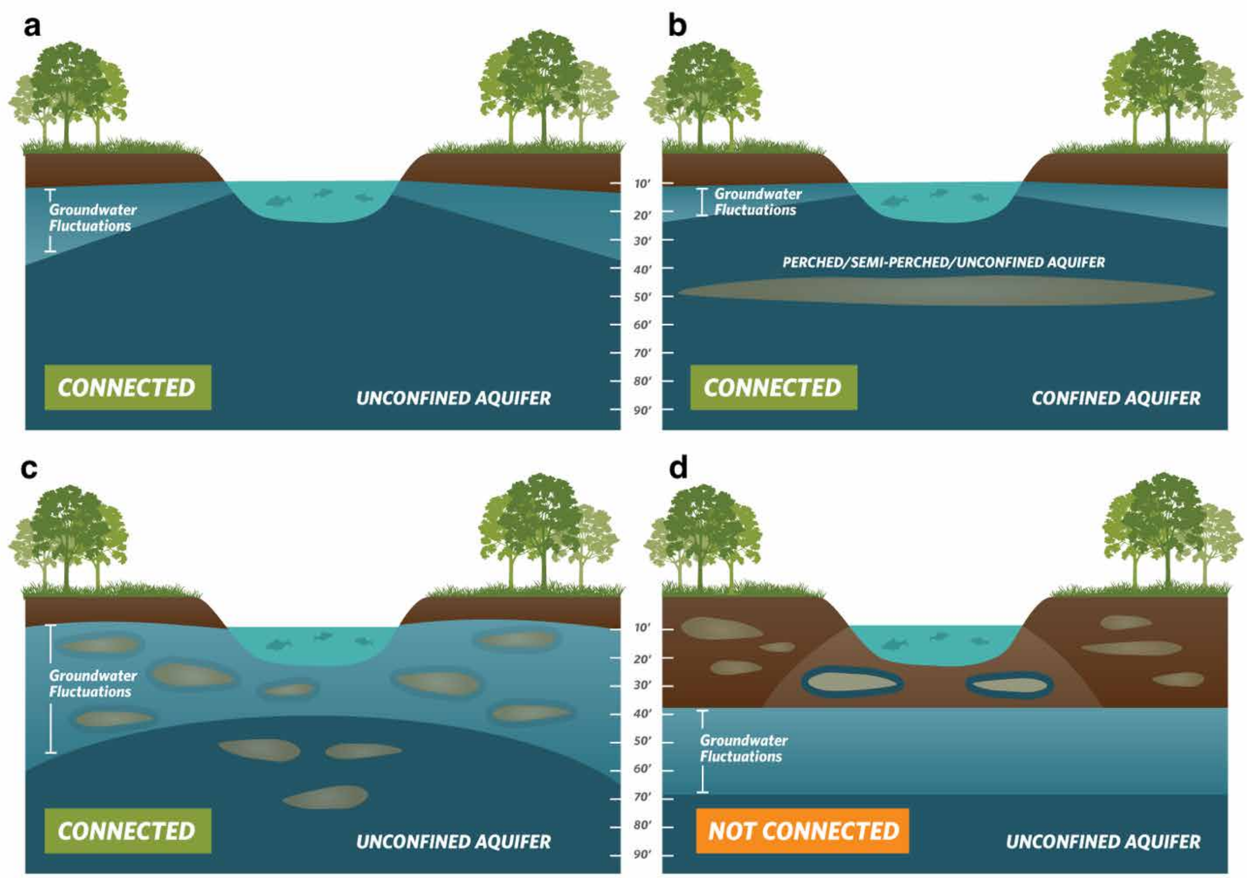


Figure 2. Confirming whether an ecosystem is connected to groundwater. Top: (a) Under the ecosystem is an unconfined aquifer with depth-to-groundwater fluctuating seasonally and interannually within 30 feet from land surface. (b) Depth-to-groundwater in the shallow aquifer is connected to overlying ecosystem. Pumping predominately occurs in the confined aquifer, but pumping is possible in the shallow aquifer. Bottom: (c) Depth-to-groundwater fluctuations are seasonally and interannually large, however, clay layers in the near surface prolong the ecosystem's connection to groundwater. (d) Groundwater is disconnected from surface water, and any water in the vadose (unsaturated) zone is due to direct recharge from precipitation and indirect recharge under the surface water feature. These areas are not connected to groundwater and typically support species that do not require access to groundwater to survive.

BEST PRACTICE #2. Characterize Seasonal and Interannual Groundwater Conditions

SGMA requires GSAs to describe current and historical groundwater conditions when identifying GDEs [23 CCR §354.16(g)]. Relying solely on the SGMA benchmark date (January 1, 2015) or any other single point in time to characterize groundwater conditions (e.g., depth-to-groundwater) is inadequate because managing groundwater conditions with data from one time point fails to capture the seasonal and interannual variability typical of California's climate. DWR's Best Management Practices document on water budgets[6] recommends using 10 years of water supply and water budget information to describe how historical conditions have impacted the operation of the basin within sustainable yield, implying that a baseline[7] could be determined based on data between 2005 and 2015. Using this or a similar time period, depending on data availability, is recommended for determining the depth-to-groundwater.

GDEs depend on groundwater levels being close enough to the land surface to interconnect with surface water systems or plant rooting networks. The most practical approach[8] for a GSA to assess whether polygons in the NC dataset are connected to groundwater is to rely on groundwater elevation data. As detailed in TNC's GDE guidance document[4], one of the key factors to consider when mapping GDEs is to contour depth-to-groundwater in the aquifer that is supporting the ecosystem (see Best Practice #5).

Groundwater levels fluctuate over time and space due to California's Mediterranean climate (dry summers and wet winters), climate change (flood and drought years), and subsurface heterogeneity in the subsurface (Figure 3). Many of California's GDEs have adapted to dealing with intermittent periods of water stress, however if these groundwater conditions are prolonged, adverse impacts to GDEs can result. While depth-to-groundwater levels within 30 feet[4] of the land surface are generally accepted as being a proxy for confirming that polygons in the NC dataset are supported by groundwater, it is highly advised that fluctuations in the groundwater regime be characterized to understand the seasonal and interannual groundwater variability in GDEs. Utilizing groundwater data from one point in time can misrepresent groundwater levels required by GDEs, and inadvertently result in adverse impacts to the GDEs. Time series data on groundwater elevations and depths are available on the SGMA Data Viewer[9]. However, if insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons in the GSP <u>until</u> data gaps are reconciled in the monitoring network (see Best Practice #6).

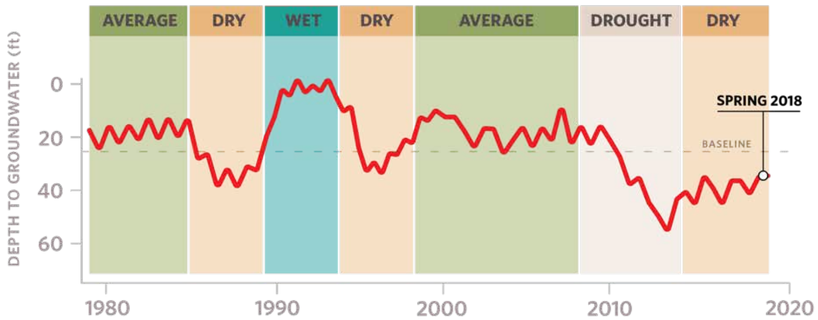


Figure 3. Example seasonality and interannual variability in depth-to-groundwater over time. Selecting one point in time, such as Spring 2018, to characterize groundwater conditions in GDEs fails to capture what groundwater conditions are necessary to maintain the ecosystem status into the future so adverse impacts are avoided.

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[6] DWR. 2016. Water Budget Best Management Practice. Available at: https://water.ca.gov/LegacyFiles/groundwater/sgm/pdfs/BMP_Water_Budget_Final_2016-12-23.pdf

[7] Baseline is defined under the GSP regulations as "historic information used to project future conditions for hydrology, water demand, and availability of surface water and to evaluate potential sustainable management practices of a basin." [23 CCR §351(e)]

[8] Groundwater reliance can also be confirmed via stable isotope analysis and geophysical surveys. For more information see The GDE Assessment Toolbox (Appendix IV, GDE Guidance Document for GSPs[4]).

[9] SGMA Data Viewer: https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer

BEST PRACTICE #3. Ecosystems Often Rely on Both Groundwater and Surface Water

GDEs are plants and animals that rely on groundwater for all or some of its water needs, and thus can be supported by multiple water sources. The presence of non-groundwater sources (e.g., surface water, soil moisture in the vadose zone, applied water, treated wastewater effluent, urban stormwater, irrigated return flow) within and around a GDE does not preclude the possibility that it is supported by groundwater, too. SGMA defines GDEs as "ecological communities and species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface" [23 CCR §351(m)]. Hence, depth-to-groundwater data should be used to identify whether NC polygons are supported by groundwater and should be considered GDEs. In addition, SGMA requires that significant and undesirable adverse impacts to beneficial users of surface water be avoided. Beneficial users of surface water include environmental users such as plants or animals[10], which therefore must be considered when developing minimum thresholds for depletions of interconnected surface water.

GSAs are only responsible for impacts to GDEs resulting from groundwater conditions in the basin, so if adverse impacts to GDEs result from the diversion of applied water, treated wastewater, or irrigation return flow away from the GDE, then those impacts will be evaluated by other permitting requirements (e.g., CEQA) and may not be the responsibility of the GSA. However, if adverse impacts occur to the GDE due to changing groundwater conditions resulting from pumping or groundwater management activities, then the GSA would be responsible (Figure 4).

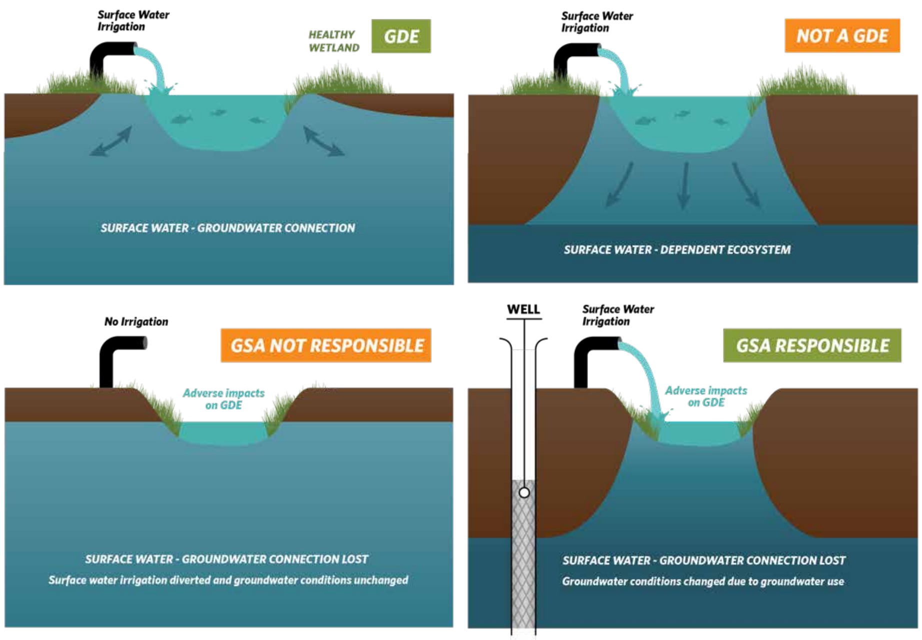

Figure 4. Ecosystems often depend on multiple sources of water. Top: (Left) Surface water and groundwater are interconnected, meaning that the GDE is supported by both groundwater and surface water. (Right) Ecosystems that are only reliant on non-groundwater sources are not groundwater-dependent. Bottom: (Left) An ecosystem that was once dependent on an interconnected surface water, but loses access to groundwater solely due to surface water diversions may not be the GSA's responsibility. (Right) Groundwater dependent ecosystems once dependent on an interconnected surface water system, but loses that access due to groundwater pumping is the GSA's responsibility.

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[10] For a list of environmental beneficial users of surface water by basin, visit: https://groundwaterresourcehub.org/gde-tools/environmental-surface-water-beneficiaries/

BEST PRACTICE #4. Select Representative Groundwater Wells

Identifying GDEs in a basin requires that groundwater conditions are characterized to confirm whether polygons in the NC dataset are supported by the underlying aquifer. To do this, proximate groundwater wells should be identified to characterize groundwater conditions (Figure 5). When selecting representative wells, it is particularly important to consider the subsurface heterogeneity around NC polygons, especially near surface water features where groundwater and surface water interactions occur around heterogeneous stratigraphic units or aquitards formed by fluvial deposits. The following selection criteria can help ensure groundwater levels are representative of conditions within the GDE area:

- Choose wells that are within 5 kilometers (3.1 miles) of each NC Dataset polygons because they are more likely to reflect the local conditions relevant to the ecosystem. If there are no wells within 5km of the center of a NC dataset polygon, then there is insufficient information to remove the polygon based on groundwater depth. Instead, it should be retained as a potential GDE until there are sufficient data to determine whether or not the NC Dataset polygon is supported by groundwater.

- Choose wells that are screened within the surficial unconfined aquifer and capable of measuring the true water table.

- Avoid relying on wells that have insufficient information on the screened well depth interval for excluding GDEs because they could be providing data on the wrong aquifer. This type of well data should not be used to remove any NC polygons.

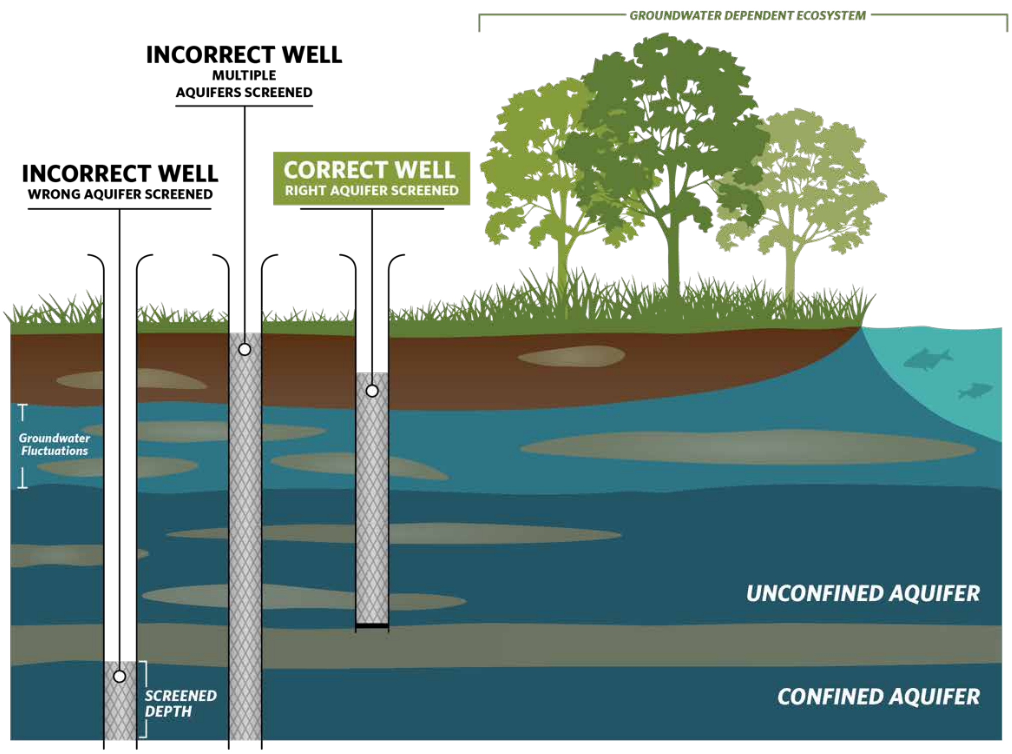
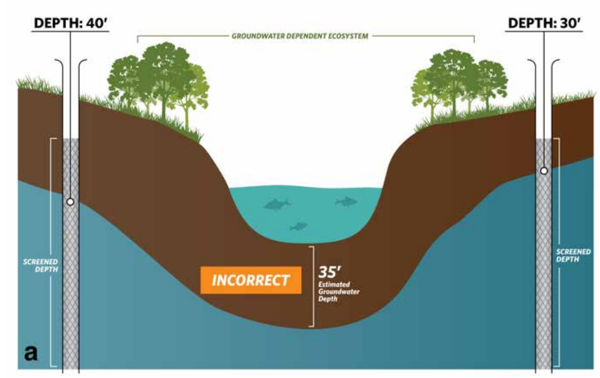


Figure 5. Selecting representative wells to characterize groundwater conditions near GDEs.

BEST PRACTICE #5. Contouring Groundwater Elevations

The common practice to contour depth-to-groundwater over a large area by interpolating measurements at monitoring wells is unsuitable for assessing whether an ecosystem is supported by groundwater. This practice causes errors when the land surface contains features like stream and wetland depressions because it assumes the land surface is constant across the landscape and depth-to-groundwater is constant below these low-lying areas (Figure 6a). A more accurate approach is to interpolate groundwater elevations at monitoring wells to get groundwater elevation contours across the landscape. This layer can then be subtracted from land surface elevations from a Digital Elevation Model (DEM)[11] to estimate depth-to-groundwater contours across the landscape (Figure b; Figure 7). This will provide a much more accurate contours of depth-to-groundwater along streams and other land surface depressions where GDEs are commonly found.



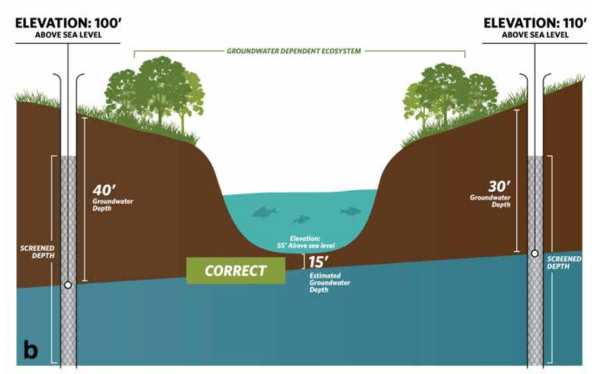


Figure 6. Contouring depth-to-groundwater around surface water features and GDEs. (a) Groundwater level interpolation using depth-to-groundwater data from monitoring wells. (b) Groundwater level interpolation using groundwater elevation data from monitoring wells and DEM data.

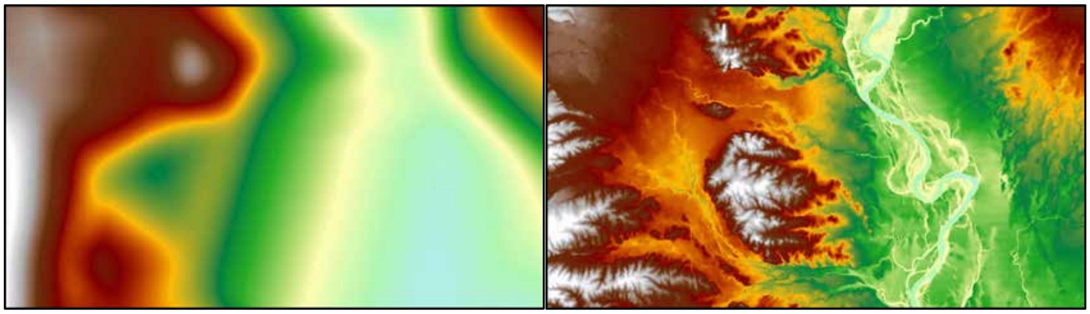


Figure 7. Depth-to-groundwater contours in Northern California. (Left) Contours were interpolated using depth-to-groundwater measurements determined at each well. (Right) Contours were determined by interpolating groundwater elevation measurements at each well and superimposing ground surface elevation from DEM spatial data to generate depth-to-groundwater contours. The image on the right shows a more accurate depth-to-groundwater estimate because it takes the local topography and elevation changes into account.

[11] USGS Digital Elevation Model data products are described at: https://www.usgs.gov/core-science-systems/ngp/3dep/about-3dep-products-services and can be downloaded at: https://iewer.nationalmap.gov/basic/

BEST PRACTICE #6. Best Available Science

Adaptive management is embedded within SGMA and provides a process to work toward sustainability over time by beginning with the best available information to make initial decisions, monitoring the results of those decisions, and using the data collected through monitoring programs to revise decisions in the future. In many situations, the hydrologic connection of NC dataset polygons will not initially be clearly understood if site-specific groundwater monitoring data are not available. If sufficient data are not available in time for the 2020/2022 plan, The Nature Conservancy strongly advises that questionable polygons from the NC dataset be included in the GSP until data gaps are reconciled in the monitoring network. Erring on the side of caution will help minimize inadvertent impacts to GDEs as a result of groundwater use and management actions during SGMA implementation.

KEY DEFINITIONS

Groundwater basin is an aquifer or stacked series of aquifers with reasonably well-defined boundaries in a lateral direction, based on features that significantly impede groundwater flow, and a definable bottom. *23 CCR §341(g)(1)*

Groundwater dependent ecosystem (GDE) are ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface. *23 CCR §351(m)*

Interconnected surface water (ISW) surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted. *23 CCR §351(o)*

Principal aquifers are aquifers or aquifer systems that store, transmit, and yield significant or economic quantities of groundwater to wells, springs, or surface water systems. *23 CCR §351(aa)*

ABOUT US

The Nature Conservancy is a science-based nonprofit organization whose mission is *to conserve the lands and waters on which all life depends*. To support successful SGMA implementation that meets the future needs of people, the economy, and the environment, TNC has developed tools and resources (www.groundwaterresourcehub.org) intended to reduce costs, shorten timelines, and increase benefits for both people and nature.

Attachment E

Maps of representative monitoring sites in relation to key beneficial users

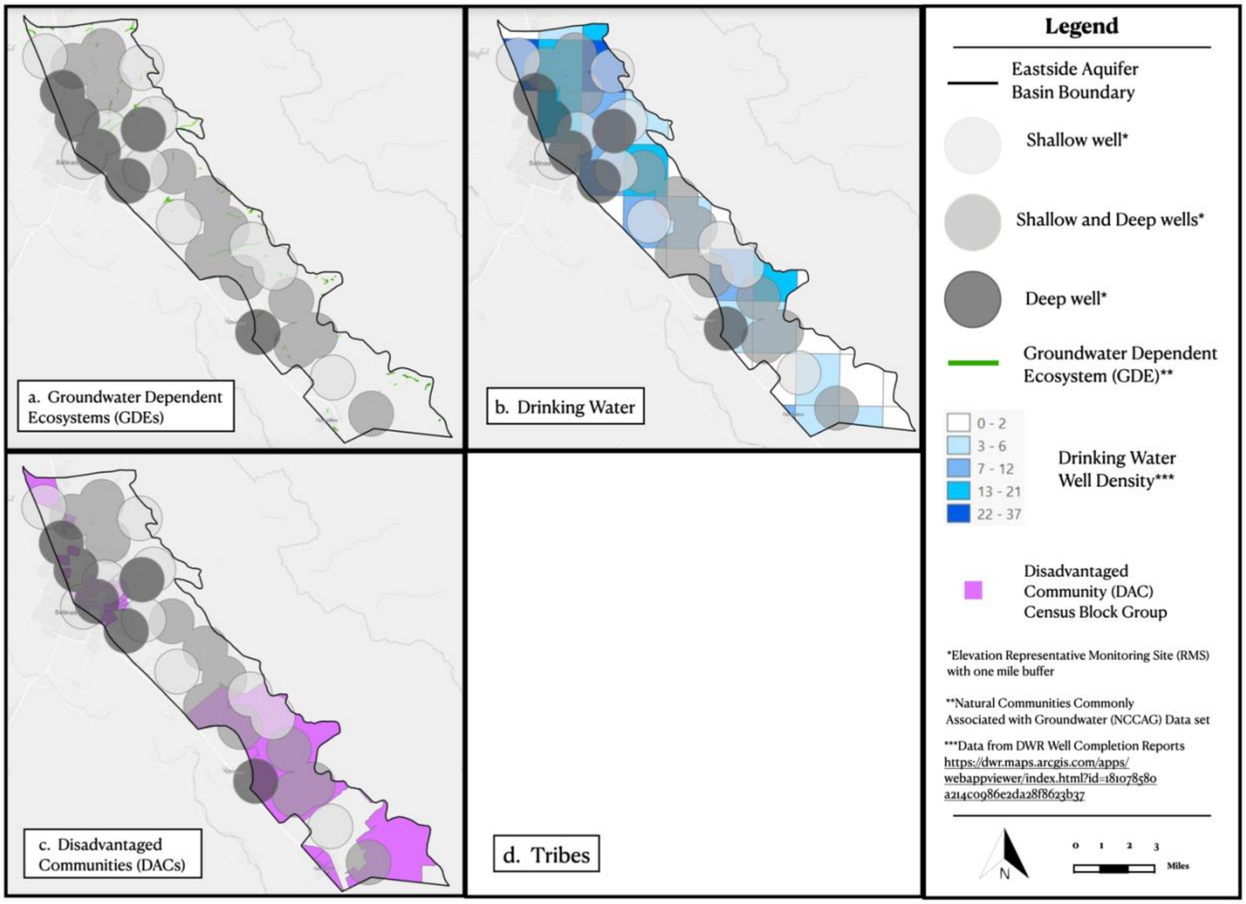


Figure 1. Groundwater elevation representative monitoring sites in relation to key beneficial users: a) Groundwater Dependent Ecosystems (GDEs), b) Drinking Water users, c) Disadvantaged Communities (DACs), and d) Tribes.

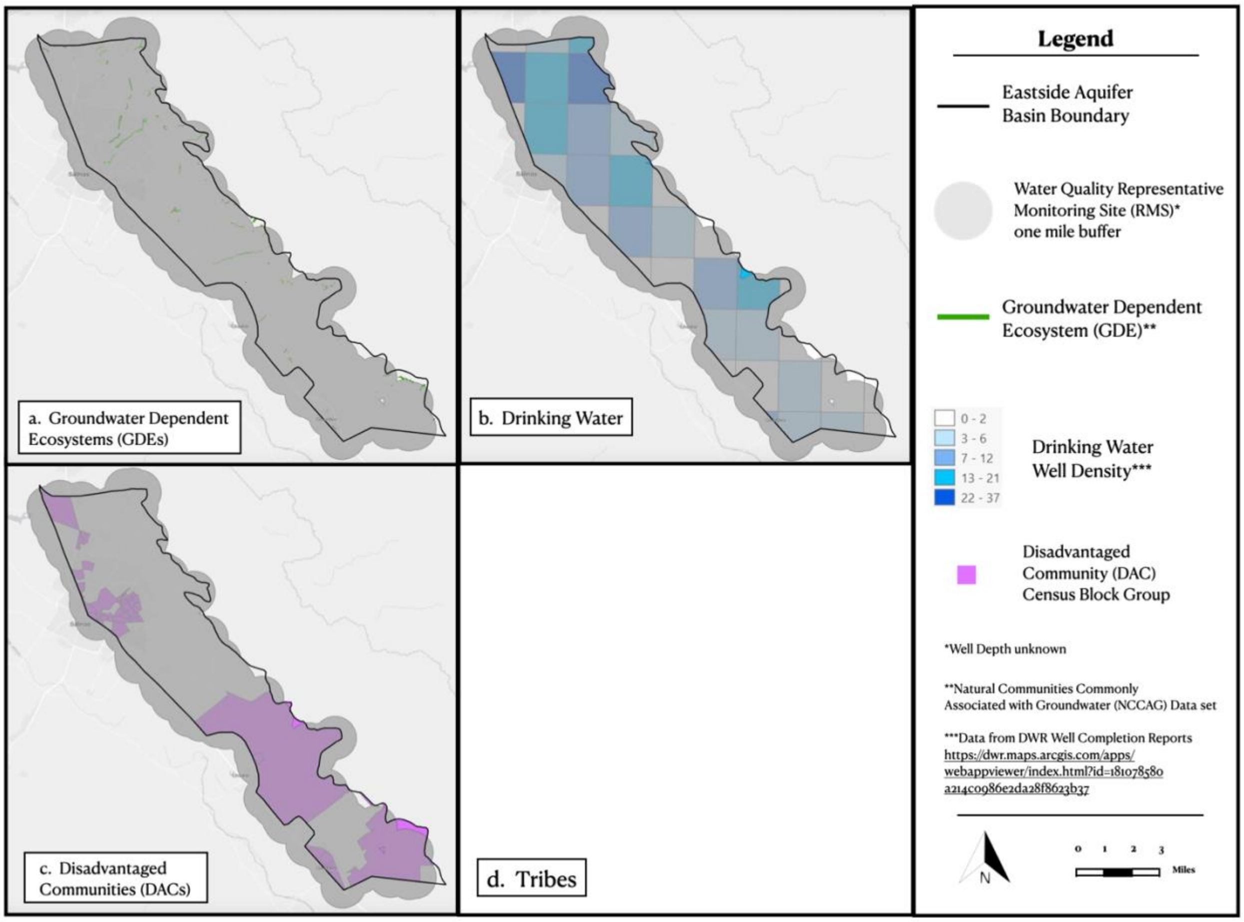


Figure 2. Groundwater quality representative monitoring sites in relation to key beneficial users: a) Groundwater Dependent Ecosystems (GDEs), b) Drinking Water users, c) Disadvantaged Communities (DACs), and d) Tribes.

Friday, October 15, 2021

SVBGSA Public Comments Form

Salinas Valley Basin Groundwater Sustainability Agency

Name	Stephanie Hastings
Organization	Brownstein Hyatt Farber Schreck, LLP
Email Address	SHastings@bhfs.com
Subbasin	Langley, Eastside, Forebay, Upper Valley, Monterey, Whole Basin
Comments	Please see the attached correspondence submitted on behalf of the Salinas Basin Water Alliance. The exhibits are available on our sharefile at: https://bhfs.sharefile.com/d-scb50238ba04e4b4294bdf73ac89d25ee
File Upload	pdf 2021.10.15 Comment Letter to SVBGSA re Dr...

Brownstein Hyatt
Farber Schreck

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October 15, 2021

VIA E-MAIL – MEYERSD@SVBGSA.ORG; BOARD@SVBGSA.ORG; PRISO@MCWD.ORG; CITYCLERK@CI.GREENFIELD.CA.US

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Remleh Scherzinger
General Manager
c/o Paula Riso
Executive Assistant/Clerk to the Board
Marina Coast Water District Groundwater Sustainability Agency
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Curtis Weeks
General Manager
c/o City Clerk
Arroyo Seco Groundwater Sustainability Agency
599 El Camino Real
Greenfield, CA 93927

RE: Draft Groundwater Sustainability Plans for the Upper Valley, Forebay, Eastside, Langley, and Monterey Subbasins of the Salinas Valley Groundwater Basin

Dear Ms. Meyers, Mr. Scherzinger, and Mr. Weeks:

This office represents the Salinas Basin Water Alliance (*Alliance*), a California nonprofit mutual benefit corporation formed to preserve the viability of agriculture and the agricultural community in the greater Salinas Valley. *Alliance* members include agricultural businesses and families that own and farm more than 80,000 acres within the Salinas Valley. Many *Alliance* members have been farming in the Salinas Valley for generations. As such, the *Alliance* has a significant interest in the long-term sustainability of the water supplies in the Salinas Valley. As mentioned in our preliminary comment letter on the draft Groundwater Sustainability Plans (GSP) for the Upper Valley, Forebay, Eastside, Langley, and Monterey Subbasins dated August 12, 2021, the *Alliance* greatly appreciates the Salinas Valley Basin Groundwater Sustainability

Agency (SVBGSA) staff and consultant team's efforts to implement the Sustainable Groundwater Management Act (SGMA) in the Salinas Valley Groundwater Basin (Basin) and in each of the six subbasins within the jurisdiction of the SVBGSA. The *Alliance* likewise appreciates the efforts undertaken by the Marina Coast Water District Groundwater Sustainability Agency (MCWDGSA) and the Arroyo Seco Groundwater Sustainability Agency (ASGSA) to implement SGMA in the Monterey and Forebay Subbasins, respectively.

The *Alliance* offers these comments, as well as the comments of aquilogic, Inc. attached hereto as **Exhibit A**, on the draft GSPs for the Upper Valley, Forebay, Eastside, Langley, and Monterey Subbasins.[1] These comments are submitted to the SVBGSA as the exclusive groundwater sustainability agency for the Upper, Eastside, and Langley Subbasins, and one of the groundwater sustainability agencies that will adopt the GSPs for the Forebay and Monterey Subbasins. These comments are also submitted to the MCWDGSA and the ASGSA as groundwater sustainability agencies that will adopt the GSPs for the Monterey Subbasin and Forebay Subbasin, respectively. Please include this letter, the aquilogic, Inc. memorandum ("aquilogic Memo"), and the other attachments hereto in the record of proceedings for the GSP of each of these subbasins.

I. <u>THE DRAFT GSPS MUST BE INTEGRATED TO SATISFY SGMA</u>

SGMA's goal is to provide for the sustainable management of priority groundwater basins throughout the State.[2] "Sustainable management" is defined as the "management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results"—e.g., chronic lowering of groundwater levels, significant and unreasonable reduction of groundwater storage, significant and unreasonable seawater intrusion, and depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water.[3] In order to achieve this goal, groundwater sustainability agencies must coordinate groundwater management within each basin[4] and with each adjacent basin.[5]

Coordination requires GSPs to maintain consistency or analyze inconsistencies in the data and modeling used to develop the GSPs, the minimum thresholds and measurable objectives set in the GSPs, and the

---

[1] The *Alliance* notes that several of the draft GSPs are being revised by the GSA during the public review process. An additional public comment period must be provided once the draft GSPs have been finalized for adoption. Informed public input cannot be provided on documents that are still subject to change.
[2] Wat. Code, § 10720.1.
[3] Wat. Code, § 10721(v), (x).
[4] SGMA defines "basin" as "a groundwater basin or subbasin identified and defined in Bulletin 118." (Wat. Code, § 10721(b); see also 23 Code Regs. ("GSP Regs."), § 341(g) ["The term 'basin' shall refer to an area specifically defined as a basin or 'groundwater basin' in Bulletin 118, and shall refer generally to an aquifer or stacked series of aquifers with reasonably well-defined boundaries in a lateral direction, based on features that significantly impede groundwater flow, and a definable bottom, as further defined or characterized in Bulletin 118"; "The term 'subbasin' shall refer to an area specifically defined as a subbasin or 'groundwater subbasin' in Bulletin 118, and shall refer generally to any subdivision of a basin based on geologic and hydrologic barriers or institutional boundaries, as further described or defined in Bulletin 118."].)
[5] Wat. Code, §§ 10727, 10727.6.

projects and management actions proposed in the GSPs.[6] DWR will review each GSP to ensure it satisfies this requirement—i.e., that the GSP does not adversely affect the "ability of an adjacent basin to implement their groundwater sustainability plan or impedes achievement of sustainability goals in an adjacent basin."[7] Any GSP that cannot meet this standard will not satisfy SGMA.[8]

The consultant that prepared the draft GSPs for the Upper, Forebay, Eastside, and Langley Subbasins has acknowledged the importance of integrated management of surface water and groundwater throughout the Basin:

> It has long been acknowledged that the water resources of the Salinas Valley consist of an integrated surface water and groundwater system . . . This acknowledged surface water/groundwater integration underpins the approach the SVBGSA is taking to achieving groundwater sustainability throughout the Valley; the Salinas River is an integral part of groundwater management and managing groundwater cannot be divorced from the Salinas River's operations. Similarly, groundwater management plays an important role in maintaining Salinas River flows. Larger areas of low groundwater levels in the Salinas Valley will induce more leakage from the Salinas River – reducing Salinas River flows. Maintaining adequately high groundwater levels will help maintain Salinas River flows. These higher groundwater levels that help maintain Salinas River flows is one of the desired outcomes of our groundwater management and is a benefit to surface water users. Groundwater sustainability can lead to long-term reliability in surface water supplies . . .
>
> The Salinas River operations, Salinas River flows, and ability to use water from the River will be clearly influenced by the decisions made during GSP development and implementation. Balanced groundwater management that

[6] See e.g., Wat. Code, § 10727.6; GSP Regs., § 354.28(b) ("The description of minimum thresholds shall include the following: . . . (3) How minimum thresholds have been selected to avoid causing undesirable results in adjacent basins or affecting the ability of adjacent basins to achieve sustainability goals."); see also *id.* at §§ 350.4(b), 354.28(b), 354.34(i), 354.38(e), 354.44(b)(6)-(7), 357.2; Department of Water Resources (DWR) Sustainable Management Criteria BMP, pp. 12-17 (Considerations when establishing minimum thresholds for each sustainability indicator includes the adjacent basin's minimum thresholds); DWR Modeling BMP, pp. 21-22; DWR Water Budget BMP, pp. 12, 16, 17, 36.
[7] Wat. Code, § 10733(c).
[8] *Ibid.*; GSP Regs., §§ 350.4, 354.8(d), 354.14, 354.18, 354.28(b)(3), 354.44(b)(6), 354.44(c), 355.4(b), 356.4(j), 357.2(b)(3); DWR Monitoring Networks and Identification of Data Gaps BMP, pp. 6, 8, 27; DWR Water Budget BMP, pp. 7, 12, 16, 17, 36; DWR Modeling BMP, pp. 21-22; DWR Sustainable Management Criteria BMP, pp. 9, 31.

> maintains consistent groundwater levels will provide surface water reliability for the Valley's surface water users.[9]

A Senior Hydrologist with the Monterey County Water Resources Agency (MCWRA) similarly commented:

> Additionally, as was experienced and monitored throughout the Basin during the most recent drought period, lowering of the groundwater table has a significant impact on the Agency's ability to operate the reservoirs to a controlled range of flows at the Salinas River Diversion Facility. As such, overdraft of the groundwater basin, resulting in a reduction in groundwater levels significantly impacted surface water flows, depleting the availability of surface water to riparian water uses.[10]

Close coordination of the draft GSPs for the subbasins is critical as each of the GSPs acknowledge a significant hydrologic and hydraulic connection with adjacent subbasins.[11] In other words, groundwater management in the Upper Valley impacts groundwater management in the Forebay Subbasin, which impacts groundwater management in the 180/400-Foot Aquifer, Eastside, Langley, and Monterey Subbasins, and there is a direct link between groundwater in the Basin and surface water in the Salinas River.

Given the integration of the Basin's surface and groundwater supplies (e.g., that pumping in one subbasin impacts surface and subsurface flows to an adjacent subbasin), SGMA mandates the coordination and integration of the GSPs for the subbasins within SVBGSA's jurisdiction—the GSPs must be integrated in their planning, development, and implementation to ensure the objectives of SGMA are satisfied, the interests of all beneficial users throughout the Basin are considered, and the burden of sustainability is equitably allocated across the Basin.[12] Indeed, the SVBGSA has acknowledged this obligation in its Joint Exercise of Powers Agreement[13] and, as the groundwater sustainability agency for the 180/400-Foot Aquifer, Monterey,

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[9] Feb. 26, 2019 Letter from Derrik Williams to Leslie Girard, attached hereto as **Exhibit B**.

[10] March 4, 2019 Memorandum from Howard Franklin to Leslie Girard and Gary Petersen, attached hereto as **Exhibit C**.

[11] Draft Upper Valley Subbasin GSP, § 4.3.1.1; Draft Forebay Subbasin GSP, § 4.3.1.1; Draft Eastside Subbasin GSP, § 4.3.1.1; Draft Langley Subbasin GSP, § 4.3.1.1; Draft Monterey Subbasin GSP, § 4.2.3; aquilogic Memo, pp. 2-3, attached hereto as **Exhibit A**.

[12] Wat. Code, § 10723.2; see also DWR Water Budget BMP, pp. 16-17 ("For many basins within the . . . Salinas Valley . . . not all lateral boundaries for contiguous basins serve as a barrier to groundwater or surface water flow . . . In situations where a basin is adjacent or contiguous to one or more additional basins, or when a stream or river serves as the lateral boundary between two basins, it is necessary to coordinate and share water budget data and assumptions. This is to ensure compatible sustainability goals and accounting of groundwater flows across basins, as described in § 357.2 (Interbasin Agreements) of the GSP Regulations."

[13] See Joint Exercise of Powers Agreement Establishing the Salinas Valley Basin GSA, § 2.2 ("The purpose of Agency is to . . . develop[], adopt[], and implement[] a GSP that achieves groundwater sustainability in the Basin."); § 4.1(c) (The JPA has the power to "develop, adopt and implement a GSP for the Basin."); *id.* at § 4.1(l) (The JPA has the power to "establish and administer projects and programs for the benefit of the Basin."); *id.* at § 4.3 ("As set forth in Water Code section 10723.3, the GSA shall consider the interests of all beneficial uses and users of groundwater in the Basin, as well as those responsible for implementing the

Eastside, Langley, Forebay, and Upper Subbasins, the SVBGSA is uniquely qualified to ensure coordination and integration among these subbasins. The SVBGSA previously proposed an integrated GSP that would incorporate the GSPs for each of the six subbasins, but appears to have abandoned or significantly delayed that commitment. As a result, the draft GSPs do not adequately coordinate and integrate their data, minimum thresholds and measurable objectives, and projects and management actions and do not analyze potential impacts on the adjacent subbasins. The draft GSPs must analyze and address these issues before they can be adopted, or delineate a plan for adding this information to the GSPs as soon as possible.

II. THE DRAFT GSPs DO NOT SUFFICIENTLY ANALYZE AND ADDRESS SUSTAINABLE GROUNDWATER MANAGEMENT THROUGHOUT THE BASIN

The *Alliance* supports integrated groundwater management throughout the Basin—such management is critical to the sustainable and equitable management of the integrated water resources throughout the Basin. In accordance with SGMA, this management should utilize consistent data and modeling, analyze impacts of groundwater production on adjacent subbasins, estimate sustainable yields and set minimum thresholds in consideration of impacts to adjacent subbasins, and coordinate projects and management actions throughout the Basin. As described further below, the draft GSPs as currently presented do not meet these thresholds dictated by SGMA.

A. Each Draft GSP Fails to Analyze Inconsistencies in the Data and Modeling Utilized By the Draft GSPs for Adjacent Subbasins

As an initial matter, the draft GSPs for the subbasins utilize differing modeling/estimation techniques that produce inconsistent data throughout the Basin and prevent integration of groundwater management absent additional analysis.

For example, the 180/400-Foot Aquifer Subbasin GSP's historical and current water budgets were created "by aggregating data and analyses from previous reports and publicly available sources" while the future

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GSP. Additionally, as set forth in Water Code section 10720.5(a) any GSP adopted pursuant to this Agreement shall be consistent with Section 2 of Article X of the California Constitution and nothing in this Agreement modifies the rights or priorities to use or store groundwater consistent with Section 2 of Article X of the California Constitution . . . Likewise, as set forth in Water Code section 10720.5(b) nothing in this Agreement or any GSP adopted pursuant to this Agreement determines or alters surface water rights or groundwater rights under common law or ay provision of law that determines or grants surface water rights."); 180/400-Foot Aquifer Subbasin GSP, p. 9-10 ("This GSP is part of an integrated plan for managing groundwater in all six subbasins of the Salinas Valley Groundwater Basin that are managed by the SVBGSA. The projects and management actions described in this GSP constitute an integrated management program for the entire Valley."); *id.* at 10-14 ("The SVBGSA oversees all or part of six subbasins in the Salinas Valley Groundwater Basin. Implementing the 180/400-Foot Aquifer Subbasin GSP must be integrated with the implementation of the five other GSPs in the Salinas Valley Groundwater Basin . . . The implementation schedule reflects the significant integration and coordination needed to implement all six GSPs in a unified manner."); see also Draft Upper Valley GSP, p. 10-16; Draft Eastside Subbasin GSP, pp. 9-1, 10-7, 10-8, 10-16; Draft Forebay Subbasin GSP, pp. 2-4, 9-2, 9-4, 10-7, 10-9, 10-17; Draft Langley Subbasin GSP, pp. 2-4, 9-1, 9-4, 10-8, 10-9, 10-16.

water budget was created using the Salinas Valley Integrated Hydrologic Model (SVIHM).[14] The draft GSPs for the Eastside, Langley, Forebay, and Upper Valley Subbasins take a different approach—the historical and current water budgets were developed using a "provisional version" of the SVIHM, while future water budgets were developed using "an evaluation version" of the Salinas Valley Operational Model (SVOM).[15] And the draft Monterey Subbasin GSP utilizes a third approach—employing the Monterey Subbasin Groundwater Flow Model for the historic, current, and projected water budgets.[16]

What is more, each of these approaches uses different time periods: (1) the 180/400-Foot Aquifer Subbasin GSP analyzes a historical period of 1995 to 2014 and a current period of 2015 to 2017[17]; (2) the draft GSPs for the Langley, Eastside, Forebay, and Upper Valley Subbasins analyze a historical period of 1980 through 2016 and a current period of 2016[18]; and, (3) the draft Monterey Subbasin GSP analyzes a historical period of 2004 to 2018 and a current period of 2015 to 2018.[19]

The inconsistency in the water-budget approaches for each subbasin must be addressed in the draft GSPs. Absent such an analysis, the draft GSPs cannot adequately analyze a subbasin's potential to impact an adjacent subbasin or foster integrated groundwater management throughout the Basin.[20] Further, this absence of analysis prevents informed input on the draft GSPs by interested parties.[21]

This issue is best exemplified in the inconsistencies between the 180/400-Foot Aquifer Subbasin GSP and the draft Forebay Subbasin GSP. The 180/400-Foot Aquifer Subbasin GSP estimates that the 180/400-Foot Aquifer Subbasin receives (historically and currently) 17,000 acre-feet per year (AFY) of subsurface flow from the Forebay Subbasin.[22] However, the draft Forebay Subbasin GSP estimates that this amount was 3,100 AFY historically and 2,900 AFY currently. These numbers in the draft Forebay GSP are likely

[14] 180/400-Foot Aquifer Subbasin GSP, p. 6-1.
[15] See each referenced draft GSP, pp. 6-1-2. The GSA's use of the SVIHM and SVOM models for the draft GSPs does not satisfy the modeling requirements in the GSP Regulations. Section 352.4(f) of the GSP Regulations state that the models used to develop GSPs must "include publicly available supporting documentation" and "consist of public domain open-source software." The GSPs acknowledge that these requirements are not satisfied, and the draft GSPs state that "[d]etails regarding source data, model construction and calibration, and results for future budgets will be summarized in more detail once the model and associated documentation are available." (See, e.g., Draft Upper Valley Aquifer Subbasin GSP, pp. 6-1-2.) Interested parties cannot provide informed comments and input on the draft GSPs until the GSAs incorporate use of models that satisfy the GSP Regulations.
[16] Draft Monterey Subbasin GSP, p. 6-7.
[17] 180/400-Foot Aquifer Subbasin GSP, p. 6-1.
[18] See each referenced draft GSP, pp. 6-7-8.
[19] Draft Monterey Subbasin GSP, p. 6-5.
[20] See DWR, Water Budget BMP, p. 9 ("Building a coordinated understanding of the interrelationship between changing water budget components and aquifer response will allow local water resource managers to effectively identify future management actions and projects most likely to achieve and maintain the sustainability goal for the basin.").
[21] The draft GSPs also do not explain why different years are used to set minimum thresholds and measurable objectives in each subbasin, or how those inconsistencies impact sustainable groundwater management. (See aguilogic, Inc. Memo, p. 3, attached hereto as **Exhibit A**.)
[22] 180/400-Foot Aquifer Subbasin GSP, p. 6-16.

overestimates (i.e., the 180/400-Foot Aquifer is estimated to receive less subsurface flow from the Forebay Subbasin than the stated numbers) as the SVIHM utilized to provide the estimates in the draft Forebay Subbasin GSP only accounted for approximately 65% of the groundwater pumping in the Forebay Subbasin.[23] The discrepancy in interbasin flow needs to be addressed in the draft Forebay Subbasin GSP, or identified as a data gap that will be addressed through additional modeling as soon as possible. Without such information, the draft GSP cannot analyze how its implementation will impact the implementation of the 180/400-Foot Aquifer Subbasin GSP.

In sum, the draft GSPs must identify and analyze the inconsistencies in the modeling simulations and the time periods used for the water budgets in each of the GSPs in order to satisfy SGMA.[24] The *Alliance* identified a potential solution to this issue in its correspondence to the SVBGSA dated August 12, 2021, wherein the *Alliance* requested that the GSA conduct additional simulations with the SVIHM that are specifically focused on the issue of interbasin groundwater flows in order to understand the amount of Basin-wide groundwater discharge that is and has been captured by pumping. After adjusting the modelling simulations with GEMS data, the SVBGSA could integrate the data into the draft GSPs and provide an informed analysis of how each draft GSP will impact adjacent subbasins. Based upon the text of the draft GSPs, it appears that this modelling has already been completed in some capacity. In each of the draft GSPs for the Langley, Eastside, Forebay, and Upper Valley Subbasins, the GSPs state a “model simulation without any groundwater pumping in the model . . . was compared to the model simulation with groundwater pumping” to understand depletion of interconnected surface water.[25] However, the draft GSPs do not extrapolate this data to analyze impacts on surface or subsurface interbasin flows or adjacent subbasins. The *Alliance* understands that the SVBGSA is undertaking additional modeling for an update to the draft GSPs and strongly recommends that the SVBGSA incorporate the *Alliance’s* requested modeling simulations into the update. If not, the *Alliance* urges the SVBGSA to commit to adding this information prior to adoption of the draft GSPs or committing to a timeline in which it will be added shortly thereafter. Without this information, the GSPs cannot not analyze each of the issues required to be addressed by SGMA.

B. The Draft GSPs Do Not Adequately Analyze Impacts to Adjacent Subbasins

As discussed above, a GSP must not adversely affect “the ability of an adjacent basin to implement their [GSP] or impede[] achievement of sustainability goals in an adjacent basin.”[26] The GSP Regulations specify that minimum thresholds should be selected to “avoid causing undesirable results in adjacent basins or affecting the ability of adjacent basins to achieve sustainability goals.”[27] And the GSP Regulations require DWR to evaluate a GSP to ensure it satisfies these objectives.[28] The draft GSPs as currently presented do not satisfy these requirements.

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[23] Draft Forebay Subbasin GSP, pp. 6-19, 21.
[24] See, e.g., DWR Water Budget BMP, pp. 16-17.
[25] See, e.g., Draft Forebay Subbasin GSP, p. 5-30.
[26] Wat. Code, § 10733.
[27] GSP Regs., § 354.28(b)(3).
[28] GSP Regs., § 355.4(b)(7).

1. <u>The Draft Eastside Subbasin and Langley Subbasin GSPs</u>

The Eastside Subbasin and Langley Subbasin GSPs largely require similar analysis and information to satisfy SGMA. The GSPs do not account for impacts to adjacent subbasins in defining sustainable yields or setting minimum thresholds and measurable objectives. Each of these issues is addressed in detail below.

a. *The GSPs do not account for impacts to adjacent subbasins in defining sustainable yields*

SGMA defines "sustainable yield" as "the maximum quantity of water, calculated over a base period representative of long-term conditions in the basin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing an undesirable result."[29] Further, the sustainable yield must be defined in a manner that will not result in undesirable results in adjacent subbasins.[30] Here, the sustainable yields in the draft GSPs for both the Eastside and Langley Subbasins do not account for impacts on interbasin flow to the 180/400-Foot Aquifer Subbasin.

For example, the draft Eastside Subbasin GSP states that a pumping depression east of the City of Salinas creates a hydraulic gradient towards the depression, with groundwater flowing towards the pumping depression and away from the boundary with the 180/400-Foot Aquifer Subbasin.[31] This depression has reversed the natural downgradient groundwater flow from the Eastside Subbasin to the 180/400-Foot Aquifer Subbasin, drawing 3,600 AFY historically and 5,400 AFY currently of groundwater from the 180/400-Foot Aquifer Subbasin.[32] This amount is likely substantially underestimated as the SVIHM only accounts for 81% of groundwater pumping in the Subbasin.[33] Despite this unnatural hydraulic gradient and the pull of groundwater from the 180/400-Foot Aquifer Subbasin, the draft Eastside Subbasin GSP includes this interbasin flow in its calculation of sustainable yield,[34] but the draft GSP does not analyze how estimated sustainable yield will impact groundwater management in the 180/400-Foot Aquifer Subbasin.

Similarly, the draft Langley Subbasin GSP states that a pumping depression has formed in the center of the Langley Subbasin as a result of a pumping trough.[35] Groundwater is drawn towards the pumping depression and away from the 180/400-Foot Aquifer Subbasin despite the natural downward gradient flow towards the 180/400-Foot Aquifer and Eastside Subbasins.[36] The draft Langley Subbasin GSP then estimates that,

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[29] Wat. Code, § 10721(w).
[30] See Wat. Code, § 10733.
[31] Draft Eastside Subbasin GSP, p. 5-11.
[32] *Id.* at pp. 6-19-20 ("Groundwater pumping near the [C]ity of Salinas has created a cone of depression . . . that draws in groundwater into the Eastside Aquifer Subbasin from the 180/400-Foot Aquifer Subbasin, which is naturally slightly downgradient in the Salinas area. Estimated groundwater inflows from the 180/400-Foot Aquifer Subbasin have slightly increased since 1980.").
[33] *Id.* at p. 6-17. The 180/400-Foot Aquifer Subbasin GSP estimates the outflow to the Eastside and Langley Subbasins amounts to 8,000 AFY. (*Id.* at p. 6-19.)
[34] *Id.* at pp. 6-22-24, Table 6-10.
[35] Draft Langley Subbasin GSP, p. 5-7.
[36] *Id.* at p. 5-18, Figure 5-11.

despite this reversal in groundwater elevations, the 180/400-Foot Aquifer Subbasin has historically received 3,700 AFY and currently receives 2,900 AFY in interbasin flow from the Langley Subbasin, while the Eastside Subbasin has historically received 1,100 AFY and currently receives 1,700 AFY in interbasin flow from the Langley Subbasin.[37] However, the draft Langley Subbasin GSP fails to analyze how the pumping depression in the Langley Subbasin has impacted and will continue to impact these interbasin flows—e.g., what are the outflows to the 180/400-Foot Aquifer and Eastside Subbasins if the pumping depression were ameliorated? Again, the draft GSP includes these unnatural interbasin flows in its calculation of the sustainable yield without analyzing the impacts on adjacent subbasins.[38]

Without understanding how groundwater production impacts interbasin flows, the draft GSPs cannot accurately estimate the sustainable yield of the subbasins and their impact on adjacent subbasins.[39] As discussed above, this issue can be addressed by undertaking the additional modeling simulations requested by the *Alliance* and revising the draft GSPs accordingly. This additional information should be added prior to the adoption of the draft GSPs, or the draft GSPs should commit to a timeline under which this information will be added as soon as possible after adoption of the draft GSPs.

b. *The GSPs do not analyze how their minimum thresholds and measurable objectives will impact adjacent subbasins*

The draft GSPs also do not consider impacts to adjacent subbasins in their setting of minimum thresholds and measurable objectives, as required by SGMA.[40]

For example, the draft Eastside Subbasin GSP sets the minimum threshold for groundwater elevations at 2015 levels.[41] As shown in Figure 8-1, these levels are only nominally above historic lows (approximately 6 feet higher) and barely above the lowest elevation since the introduction of the CSIP and Salinas Valley Water Project.[42] Consequently, these groundwater elevations will still produce a significant pumping

[37] *Id.* at p. 6-19.
[38] *Id.* at pp. 6-21-23.
[39] See DWR Water Budget BMP, p. 17 (To evaluate the impact on adjacent basin, "this will necessitate GSA coordination and sharing of water budget data, methodologies, and assumptions between contiguous basins including: • Accurate accounting and forecasting of surface water and groundwater flows across the basin boundaries.").
[40] GSP Regs., § 354.28(b)(3) ("The description of minimum thresholds shall include the following: . . . (3) How minimum thresholds have been selected to avoid causing undesirable results in adjacent basins or affecting the ability of adjacent basins to achieve sustainability goals."); see also GSP Regs., § 355.4(b)(7); DWR Sustainable Management Criteria BMP, p. 9; DWR Sustainable Management Criteria BMP, p. 10 ("The purpose of the specific requirements is to ensure consistency within groundwater basins and between adjacent groundwater basins.").
[41] Draft Eastside Subbasin GSP, p. 8-7.
[42] *Id.* at p. 8-13.

depression east of the City of Salinas that will draw water away from the boundary with the 180/400-Foot Aquifer Subbasin.[43]

Similarly, the draft Langley Subbasin GSP sets the minimum threshold for groundwater elevations at 2019 levels—the lowest elevations since the introduction of the CSIP and Salinas Valley Water Project and only nominally above the historic lows in the Subbasin.[44] These levels will continue to produce a significant pumping depression east of the City of Salinas that will draw water away from the boundary with the 180/400-Foot Aquifer Subbasin.[45] Despite the maintenance of these unnatural gradients, neither draft GSP analyzes how these minimum thresholds will impact adjacent subbasins (e.g., the 180/400-Foot Aquifer Subbasin).

The draft GSPs for the Eastside and Langley Subbasins merely include the statement that: "Minimum thresholds for the [subbasins] will be reviewed relative to information developed for the neighboring subbasins' GSPs to ensure that these minimum thresholds will not prevent the neighboring subbasins from achieving sustainability."[46] This statement is not evidence and it does not ensure the management of the subbasins will avoid impacts to adjacent subbasins.[47] As discussed above, this issue can be addressed by undertaking the additional modeling simulations requested by the *Alliance* and revising the draft GSPs accordingly.

The lack of analysis is concerning as both draft GSPs acknowledge that low groundwater elevations within the Langley and Eastside Subbasins may exacerbate seawater intrusion in the 180/400-Foot Aquifer Subbasin.[48] But the draft GSPs only mention this issue in concluding: "The chronic lowering of groundwater

[43] *Id.* at p. 8-10, Figure 8-3. The same issue applies to the draft Eastside Subbasin GSP's measurable objective for groundwater elevations—it maintains a pumping depression that reverses the natural hydraulic gradient towards the 180/400-Foot Aquifer Subbasin but fails to explain how the measurable objective will not impact the 180/400-Foot Aquifer Subbasin. (See e.g., Draft Eastside Subbasin GSP, p. 8-19.)

[44] Draft Langley Subbasin GSP, pp. 8-8, 8-13.

[45] *Id.* at p. 8-10. Again, the same issue applies to the draft Langley Subbasin GSP's measurable objective for groundwater elevations—it maintains a pumping depression that reverses the natural hydraulic gradient towards the 180/400-Foot Aquifer Subbasin but fails to explain how the measurable objective will not impact the 180/400-Foot Aquifer Subbasin. (See e.g., Draft Langley Subbasin GSP, p. 8-19.)

[46] *Id.* at p. 8-6; Draft Eastside Subbasin GSP, p. 8-16.

[47] See Joint Exercise of Powers Agreement Establishing the SVBGSA, § 4.3 ("As set forth in Water Code section 10723.3, the GSA shall consider the interests of all beneficial uses and users of groundwater in the Basin, as well as those responsible for implementing the GSP. Additionally, as set forth in Water Code section 10720.5(a) any GSP adopted pursuant to this Agreement shall be consistent with Section 2 of Article X of the California Constitution and nothing in this Agreement modifies the rights or priorities to use or store groundwater consistent with Section 2 of Article X of the California Constitution . . . Likewise, as set forth in Water Code section 10720.5(b) nothing in this Agreement or any GSP adopted pursuant to this Agreement determines or alters surface water rights or groundwater rights under common law or ay provision of law that determines or grants surface water rights.").

[48] See Draft Langley Subbasin GSP, pp. 3-18, 4-32, 5-18 (Figure 5-11 "shows the groundwater elevations that are persistently below sea levels that, when paired with a pathway, enable seawater intrusion. The groundwater elevation contours show that groundwater is drawn toward the depression at the northern end of the Eastside Aquifer Subbasin. If the magnitude of this depression increases, it could potentially draw seawater intrusion into the Langley Subbasin."), 5-20 (Figure 5-11); Draft Eastside Subbasin GSP, pp. 3-17,

level minimum thresholds are set above historic lows. Therefore, the groundwater elevation minimum thresholds are intended to not exacerbate, and may help control, the rate of seawater intrusion."[49] That statement must be revised to acknowledge that the pumping depressions in the Langley and Eastside Subbasins will remain even if the groundwater elevation minimum thresholds and measurable objectives are achieved, and the seawater minimum thresholds set by the draft Langley and Eastside Subbasin GSPs only protect against seawater intrusion in their respective subbasins, not against seawater intrusion in adjacent subbasins like the 18/400-Foot Aquifer Subbasin.[50]

In sum, the draft Langley and Eastside Subbasin GSPs in their current form do not account for potential impacts to adjacent subbasins in setting their minimum thresholds and measurable objectives. As a result, the draft GSPs cannot provide any evidence that their implementation will not impair implementation of a GSP in an adjacent subbasin—e.g., the 180/400-Foot Aquifer Subbasin GSP's seawater intrusion minimum threshold, which requires seawater intrusion to be maintained at 2017 levels, and measurable objective, which requires the seawater intrusion isocontour to be pushed back to Highway 1.[51] This analysis should be added to the draft GSPs prior to adoption by the SVBGSA, or the draft GSPs should provide a commitment to incorporating this information within a time certain.[52]

c. *There is no support for using groundwater elevations as a proxy for groundwater storage minimum thresholds*

As mentioned above, the sustainable yield of the basin is the amount of water that can be withdrawn annually without causing an undesirable result, such as the "significant and unreasonable reduction of groundwater storage."[53] The GSP Regulations permit a minimum threshold for groundwater elevations to be used as the minimum threshold for other sustainability indicators, "where the Agency can demonstrate that the representative value is a reasonably proxy . . . as supported by adequate evidence."[54] Here, both the draft Eastside Subbasin GSP and the Langley Subbasin GSP utilize groundwater elevation minimum thresholds

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4-35 ("the groundwater elevations in the northwestern portion of the Eastside Subbasin (near the City of Salinas) are below sea level, creating a groundwater gradient away from the coast and towards the Eastside Subbasin"), 5-26-29 .

[49] Draft Langley Subbasin GSP, p. 8-15; Draft Eastside Subbasin GSP, p. 8-15.

[50] Draft Langley Subbasin GSP, p. 8-28; Draft Eastside Subbasin GSP, p. 8-29.

[51] See 180/400-Foot Aquifer Subbasin GSP, pp. 8-32-37.

[52] A report prepared for MCWRA has highlighted the significant impact pumping in the Eastside and Langley Subbasins has on seawater intrusion in the 180/400-Foot Aquifer Subbasin. (See November 19, 2013, Technical Memorandum, Protective Elevations to Control Sea Water Intrusion in the Salinas Valley, attached hereto as **Exhibit D**.) The report states: "At one time (before excessive pumping), the East Side Subarea was one of the natural sources of recharge to the adjacent Pressure Subarea with ground water flowing from the northeast to the southwest. However, historical groundwater level declines have resulted in a reversal of the gradient." (*Id.* at p. 3.) The report then states that: "Artificial recharge in the East Side Subarea would reduce subsurface inflow from the Pressure Subarea and eventually restore the historical northeast to southwest recharge. Both northwest underflow from the Forebay Subarea as well as southwest recharge from the East Side Subarea would help control seawater intrusion." (*Id.* at pp. 6-7.) See also aquilogic Memo, pp. 8-12, attached hereto as **Exhibit A**.

[53] Wat. Code, § 10721(w), (x).

[54] GSP Regs., § 354.28(d); DWR Sustainable Management Criteria BMP, pp. 17-18.

as proxies for groundwater storage minimum thresholds.[55] However, there is insufficient evidence to support that approach.

In particular, each of the draft GSPs sets groundwater elevations at near historic lows, and show a substantial trend in declining groundwater storage over the historic period.[56] The minimum threshold groundwater elevations, in other words, have resulted in overdraft of the subbasins.[57] And by setting the minimum thresholds at historic low groundwater elevations, the draft GSPs will facilitate continued decline in groundwater storage.[58] In fact, because there is no commitment to pump at the sustainable yield of the subbasins, it is possible that production in the subbasins could increase over historic and current amounts so long as the subbasins do not experience another significant drought and still comply with the groundwater elevation minimum thresholds. The SVBGSA's prior actions seem to imply that utilizing groundwater elevations as a proxy in this scenario is improper—the 180/400-Foot Aquifer Subbasin GSP set the groundwater storage minimum threshold to production at the projected sustainable yield.[59] The draft GSP must explain why this different approach will suffice now.

2. The Draft Forebay and Upper Valley Subbasin GSPs

The draft Forebay and Upper Valley Subbasin GSPs lack the same analysis as the draft GSPs for the Eastside and Langley Subbasins—they do not adequately consider impacts to adjacent subbasins. These issues begin with the draft GSPs' water budget and estimate of sustainable yield, and cascade through the minimum thresholds, measurable objectives, and projects and management actions.

As discussed above, SGMA requires GSPs to define a sustainable yield for each basin that will avoid undesirable results and impacts to adjacent basins. The sustainable yields defined in the draft GSPs for the Forebay and Upper Valley Subbasins do not meet this threshold. Both draft GSPs conclude that the subbasins have not been in overdraft historically, but they do not analyze how groundwater pumping within the subbasins (151,100 to 174,500 AFY in the Forebay Subbasin and 108,500 to 129,600 AFY in the Upper Valley) impacts surface and subsurface flows to adjacent subbasins.[60]

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[55] Draft Eastside Subbasin GSP, p. 8-23; Draft Langley Subbasin GSP, p. 8-22.
[56] See discussion *supra;* Draft Eastside Subbasin GSP, p. 5-21; Draft Langley Subbasin GSP, p. 5-16.
[57] *Ibid*.
[58] See, e.g., Wat. Code, § 10721(x)(1) ("Overdraft during a period of drought is not sufficient to establish a chronic lowering of groundwater levels if extractions and groundwater recharge are managed as necessary to ensure that reductions in groundwater levels or storage during a period of drought are offset by increases in groundwater levels or storage during other periods.").
[59] 180/400-Foot Aquifer Subbasin GSP, p. 8-25 ("The total volume of groundwater that can be annually withdrawn from the Subbasin without leading to a long-term reduction in groundwater storage or interfering with other sustainability indicators is the calculated sustainable yield of the Subbasin."); see also DWR GSP Assessment Staff Report, p. 25 ("The Plan describes how setting the minimum threshold as the long-term sustainable yield for the Subbasin is a reasonable, protective approach against overdraft and the long-term reduction of groundwater storage.").
[60] Draft Forebay Subbasin GSP, pp. 6-45-46; Draft Upper Valley Subbasin GSP, pp. 6-22-23.

For example, the draft Forebay Subbasin GSP states that the SVIHM, which undercounts groundwater pumping by 35%, estimates the Forebay Subbasin received 90,300 AFY historically through stream exchange, currently receives 77,800 AFY, and 31,800 AFY of that stream exchange on average is caused by groundwater pumping.[61] Similarly, the draft Upper Valley Subbasin GSP states that the SVIHM, which under counts groundwater pumping by 24%, estimates the Upper Valley Subbasin received 89,100 AFY historically through stream exchange, currently receives 65,500 AFY, and 1,100 AFY of that stream exchange on average is caused by groundwater pumping.[62] This recharge is substantially induced by the operation of the Nacimiento and San Antonio Reservoirs; prior to that time groundwater storage was significantly decreasing in the subbasins.[63] However, neither draft GSP analyzes: (a) how streamflow recharges the subbasins during drought years, offering instead averages over the historical period, and (b) how groundwater pumping impacts natural surface or subsurface flows to adjacent subbasins—i.e., without pumping, how much groundwater would flow to the downgradient subbasin? Instead, the draft GSPs use the average stream exchange amounts to facilitate a "finding" that the subbasins are presently managed within their sustainable yield. Without understanding how pumping impacts streamflow during drought years and interbasin surface and subsurface flow, the draft GSPs cannot reasonably estimate sustainable yield in the subbasins or analyze how implementation of the draft GSPs will impact adjacent subbasins' GSPs.

The failure to analyze impacts to adjacent subbasins becomes more apparent in the draft GSPs' discussion of minimum thresholds. The draft Forebay Subbasin GSP sets the minimum threshold for groundwater elevations at 2015 groundwater levels, only a few feet above the historic low, while the draft Upper Valley Subbasin GSP sets the minimum threshold for groundwater elevations at "5 feet <u>below</u> the lowest ground elevation between 2012 and 2016," significantly below the historic low.[64] These minimum thresholds are not reasonable—set at levels experienced at the bottom of a historic drought, or even lower—and cannot be qualified as sustainable groundwater management.[65] The draft Upper Valley GSP admits as much, stating: "The groundwater elevations during the 2012 to 2016 drought in the Upper Valley Aquifer Subbasin are the lowest groundwater elevations seen in the Subbasin and are considered <u>significant and unreasonable</u>."[66]

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[61] Draft Forebay Subbasin GSP, pp. 5-30, 6-23. Note that the draft GSPs may also underestimate streamflow depletion by only analyzing stream cells that are connected to groundwater more than 50% of the time. (See aquilogic Memo, p. 5, attached hereto as **Exhibit A**.)
[62] Draft Upper Valley Subbasin GSP, pp. 5-31, 6-22.
[63] Draft Upper Valley Subbasin GSP, p. 5-18; Draft Forebay Subbasin GSP, p. 5-17; see also Hydrogeology and Water Supply of Salinas Valley, pp. 15-16, attached hereto as **Exhibit D**.
[64] Draft Forebay Subbasin GSP, pp. 8-8, 8-14; Draft Upper Valley Subbasin GSP, pp. 8-7, 8-12 (emphasis added).
[65] Wat. Code, § 10720.1 ("In enacting this part, it is the intent of the Legislature to do all of the following: (a) To provide for the sustainable management of groundwater basins. . . . (c) To establish minimum standards for sustainable groundwater management."]; GSP Regs., § 355.4(b) ("When evaluating whether a Plan is likely to achieve the sustainability goal for the basin, the Department shall consider the following: (1) Whether the assumptions, criteria, findings, and objectives, including the sustainability goal, undesirable results, minimum thresholds, measurable objectives, and interim milestones are reasonable and supported by the best available information and best available science. . . .").
[66] Draft Upper Valley Subbasin GSP, p. 8-10 (emphasis added).

Moreover, the draft GSPs do not analyze how the minimum thresholds will impact flows in the Salinas River or adjacent subbasins. Rather, this analysis appears to be deferred to the future. The draft GSPs state that: "Minimum thresholds . . . will be reviewed relative to information developed for neighboring subbasins' GSPs to ensure that these minimum thresholds will not prevent the neighboring subbasin from achieving sustainability."[67] As discussed above, this issue can be addressed by undertaking the additional modeling simulations requested by the *Alliance* and revising the draft GSPs accordingly. This additional information should be added prior to the adoption of the draft GSPs, or the draft GSPs should commit to a timeline under which this information will be added as soon as possible after adoption of the draft GSPs.

These same concerns are raised with respect to the groundwater storage minimum thresholds. The draft Upper Valley Subbasin GSP uses the groundwater elevation minimum threshold as a proxy, which is permitted, as discussed above, as long as it is supported by adequate evidence.[68] However, there is no evidence supporting that approach as the groundwater elevation minimum threshold suffers the flaws discussed above, and evidence in the draft GSP relating groundwater elevations to groundwater storage shows groundwater storage at historic lows by a wide margin when groundwater levels were 5 feet above the groundwater elevation minimum threshold in 2016.[69] Similarly, the draft Forebay Subbasin GSP sets the minimum threshold for groundwater storage based upon the groundwater elevation minimum threshold: "The minimum threshold groundwater elevation contours . . . were used to estimate the amount of groundwater in storage when groundwater elevations are held at the minimum threshold levels."[70] Again, there is no evidence supporting that approach as the groundwater elevation minimum threshold is flawed as discussed above, and evidence in the draft GSP shows the groundwater elevation minimum threshold results in historic lows in groundwater storage.[71] In fact, the groundwater elevation minimum thresholds allow for additional production in the subbasins over historic and current amounts so long as the subbasins do not experience another significant drought. There is no commitment in the draft GSPs that the production in the subbasins will be restricted to the estimated sustainable yield in the subbasins, and there is no model simulation showing the minimum threshold for groundwater elevations will prevent continued decline in groundwater storage.

Finally, the draft GSPs also utilize groundwater elevations as proxies to set the minimum thresholds for depletion of interconnected surface water.[72] But again, there is no evidence supporting this approach. These groundwater elevation proxies are at or near historic lows, and there is no evidence proving these elevations will prevent the depletion of interconnected surface water that would have a significant and unreasonable impact on beneficial uses. Rather, the draft GSPs merely state that these levels will not impact beneficial uses because there is not currently any litigation over surface water uses, and due to the operation of the Nacimiento Reservoir.[73] However, this statement does not acknowledge that decreased groundwater

[67] Draft Upper Valley Subbasin GSP, p. 8-14; Draft Forebay Subbasin GSP, p. 8-17.
[68] Draft Upper Valley Subbasin GSP, p. 8-20.
[69] Draft Upper Valley Subbasin GSP, pp. 5-13, 5-18.
[70] Draft Forebay Subbasin GSP, p. 8-24.
[71] Draft Forebay Subbasin GSP, p. 5-17.
[72] See Draft Upper Valley Subbasin GSP, p. 8-39; Draft Forebay Subbasin GSP 8-42.
[73] Draft Forebay Subbasin GSP, pp. 8-44-45; Draft Upper Valley Subbasin GSP, pp. 8-41-42.

elevations will increase depletion of the Salinas River, and reduce flow to downstream uses, including those uses in adjacent subbasins.[74] Lastly, the draft GSPs do not analyze how these minimum thresholds for depletion of interconnected surface water will impact adjacent subbasins.

In sum, the draft Forebay and Upper Valley GSPs require additional data and analysis to satisfy SGMA. These issues must be addressed before the GSPs are adopted, or the draft GSPs must be provide for their provision by a date certain.[75]

3. The Inadequacies in the Draft GSPs Addressed Above Threaten to Impinge Upon Water Rights

As stated previously, each of the groundwater sustainability agencies has an obligation to consider the interests of all beneficial users of the Basin[76] when implementing SGMA. Moreover, SGMA does not "determine[] or alter[] surface water rights or groundwater rights under common law or any provision of law that determines or grants surface water rights."[77]

By not analyzing potential impacts to adjacent subbasins in each draft GSP, the groundwater sustainability agencies disproportionately allocate the burden of sustainability across the Basin and threaten to impair groundwater users' rights in and to the Basin. This approach violates SGMA and must be addressed before the groundwater sustainability agencies adopt the draft GSPs or, as discussed above, through a commitment in the draft GSPs to modify or update their contents within a time certain.

III. THE DRAFT GSPS MUST INCORPORATE PROJECTS AND MANAGEMENT ACTIONS TO ACHIEVE SUSTAINABILITY

The GSP Regulations require each GSP to "include a description of the projects and management actions the Agency has determined will achieve the sustainability goal for the basin, including projects and management actions to respond to changing conditions in the basin."[78] Because the draft GSPs are lacking the data and analysis described in Section II above, the draft GSPs cannot meet this requirement (e.g., the draft GSPs' lack of analysis of impacts to adjacent basins prevents an adequate proposal of projects and management actions to achieve sustainability). Further, without understanding impacts on interbasin surface and subsurface flow and how implementation of the draft GSPs will impact adjacent subbasins, the groundwater sustainability agencies will be unable to properly assess the benefits associated with any future projects or management actions—e.g., if they propose projects involving dam operations, how can the groundwater sustainability agencies assess the benefits of those projects to the Lower Valley? Accordingly,

[74] aquilogic Memo, pp. 3-8, attached hereto as **Exhibit A**; DWR Water Budget BMP, pp. 4-5.
[75] See also aquilogic Memo, pp. 3-8, attached hereto as **Exhibit A**.
[76] Wat. Code, § 10723.2
[77] Wat. Code, § 10720.5(b); see also Wat. Code, § 10720.1(a) and (b).
[78] GSP Regs., § 354.44(a).

the *Alliance* reserves the right to comment on the draft GSPs' proposed projects and management actions once the issues described above have been addressed.

However, as a preliminary note, the draft GSPs as currently presented do not include sufficient projects or management actions to achieve sustainable groundwater management Basin-wide. Rather, the draft GSPs appear to foist the burden of sustainable groundwater management on the Eastside, Langley, 180/400-Foot Aquifer, and Monterey Subbasins, while avoiding consequential projects and management actions in the Forebay and Upper Valley Subbasins. Indeed, the draft GSPs for the Eastside, Langley, and Monterey Subbasins each include a management action for pumping allocations and controls, but no such management action is included in the draft Forebay Subbasin or Upper Valley Subbasin GSPs.[79] Instead, the draft Forebay Subbasin and Upper Valley Subbasin GSPs include management actions that only superficially impact the subbasins—e.g., the proposed Subbasin "Sustainable Management Criteria Technical Advisory Committees," which require the formation of a "TAC for each Subbasin" that will "develop recommendations to correct negative trends in groundwater conditions and continue to meet the measurable objectives."[80] This issue must be addressed in the next draft of the GSPs.

The *Alliance* also notes that the draft GSPs do not mention the project proposed in the Hydrogeology and Water Supply of Salinas Valley White Paper prepared by the Salinas Valley Groundwater Basin Hydrology Conference for MCWRA in 1995 ("Salinas Valley White Paper"), which is attached hereto as **Exhibit E**. The "Conference" was a "panel of 10 geologists, hydrogeologists, and engineers familiar with Salinas Valley ground water basin" that was convened to "reach agreement on the basic physical characteristics of the basin, and the surface and ground water flow within the basin."[81] The Conference had a "remarkable unanimity of opinion" on the understanding of the "physical characteristics of the basin, the hydrologic system, the interaction between surface water and ground water, and definition of the specific ground water problems in the basin."[82] The Conference agreed that this understanding pointed "compellingly toward an already identified *regional* solution to the Valley's groundwater water resources problem" and recommended pursuing that solution.[83]

> The need for conjunctive operation of surface water and ground water storage was recognized as early as 1946. In 1946, the California Department of Water Resources published a report on Salinas Valley that described the occurrence of seawater intrusion and declining ground water levels. The report recommended a project to eliminate these problems that included development of surface water and ground water storage. Surface water storage was to be accomplished by the construction of dams on tributaries to Salinas River, and ground water storage was to be accomplished by ground water transfers from the Forebay Area to the Pressure Area and East [S]ide Area. The Department

[79] See Draft Eastside Subbasin GSP, § 9.4.12; Draft Langley Subbasin GSP, § 9.4.5; Draft Monterey Subbasin GSP, § 9.4.8; see also 180/400-Foot Aquifer Subbasin GSP, § 9.2 [water charges framework].
[80] Draft Upper Valley Subbasin GSP, § 9.4.1; Draft Forebay Subbasin GSP, § 9.4.1.
[81] *Id.* at p. 5.
[82] *Ibid.*
[83] *Ibid.*

> recommended transfer facilities that include wells in the Forebay Area, conveyance facilities from the Forebay Area to the Pressure and East Side Areas, and distribution facilities within the Pressure and East Side Areas. In such a conjunctive operation, the increased extraction in the Forebay Area and conveyance of water to the Pressure and East Side Areas would vacate ground water storage in the Forebay Area. This empty storage space would be refilled by additional infiltration from Salinas River . . . Part of the recommended facilities for surface water and ground water storage have been completed by the construction of the dams for San Antonio and Nacimiento reservoirs, but the facilities for the effective use of groundwater storage have not been completed. The operation of San Antonio and Nacimiento reservoirs has produced benefits to [S]alinas Valley, but the ultimate benefits that would result from the construction and operation of transfer facilities have not been realized. **The panel concluded that the facilities recommended in 1946 by the California Department of Water Resources should be completed immediately** . . . The result of partially completing the project has been an uneven distribution of benefits throughout the Valley. The Forebay Area and Upper Valley Areas have enjoyed relatively large benefits from San Antonio and Nacimiento reservoirs that would have been shared equally with the Pressure and East Side Areas if the intended transfer facilities had been built. In the absence of the transfer facilities, seawater intrusion into the Pressure Area and water-level declines within the East Side Area have not been mitigated.[84]

The Conference noted that this solution is practical as the "water resources problem in Salinas Valley is not a water supply problem. It is a water distribution problem. The basin has enough surface and ground water to meet existing and projected future average annual agricultural, and municipal and industrial water demand through the year 2030. The problem lies in managing those supplies to meet water demands at all locations in the Valley at all times."[85] This project is an example of integrated groundwater management for the Basin as a whole and should be included in the list of projects and management actions in each of the draft GSPs.[86]

IV. CONCLUSION

The *Alliance* appreciates the opportunity to provide these comments on the draft GSPs, as well as the groundwater sustainability agencies' consideration of the *Alliance*'s input. At present, the draft GSPs do not provide a sufficient basis for integrated management of the Basin given their inconsistent analytical approaches and inadequate analysis of impacts on adjacent subbasins. The *Alliance* makes these comments with the hope that these issues can be addressed through additional engagement prior to the adoption of the GSPs. It is critical that the groundwater sustainability agencies lay the foundation now for the integrated sustainable management of the Basin; without such a foundation, the agencies will not be able to satisfy their obligations under SGMA.

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[84] Salinas Valley White Paper, pp. 15-16, attached hereto as **Exhibit E (**emphasis added).
[85] *Id.* at p. 7.
[86] See aquilogic Memo, pp. 12-13, attached hereto as **Exhibit A**.

Respectfully submitted,

Stephanie Osler Hastings
Christopher R. Guillen

Exhibits:

A. October 15, 2021 aquilogic, inc. memorandum
B. February 26, 2019 Letter from Derrik Williams to Les Girard
C. March 4, 2019 Memorandum from Howard Franklin to Gary Petersen & Les Girard
D. November 19, 2013 Technical Memorandum re Protective Elevations to Control Sea Water Intrusion in the Salinas Valley
E. June 1995 Salinas Valley Ground Water Basin Hydrology Conference White Paper re Hydrogeology and Water Supply of Salinas Valley

cc: Emily Gardner, Senior Advisor / Deputy General Manager (gardnere@svbgsa.org)
Derrik Williams, Montgomery & Assoc. (dwilliams@elmontgomery.com)
Leslie Girard, Monterey County Counsel (GirardLJ@co.monterey.ca.us)

Friday, October 15, 2021

SVBGSA Public Comments Form

Salinas Valley Basin Groundwater Sustainability Agency

Name	Douglas Deitch
Organization	Monterey Bay Conservancy (MBC)
Email Address	siddhartha1002@gmail.com
Subbasin	Langley, Eastside, Forebay, Upper Valley, Monterey, Whole Basin, 180/400
Chapter	Salinas Valley Basin GSA (entire)

Comments

https://twitter.com/DouglasDeitch/status/1375814806364594178/photo/1

Part I-General comments on balkanized/"sub basined" and too many Monterey Bay GSAs, our ground water commons, our Water Berry (and other similar) Ponzi Schemes (MBC @ CCC 2009 @ http://www.begentlewiththeearth.org , http://ourinconvenienttruth.net http://ourinconvenienttruth.org http://ourinconvenienttruth.com & 2011 @ http://douglasdeitch.com http://douglasdeitch.net & MBC @ http://dougforassembly.com @ SWRCB requesting SWRCB Monterey Bay Regional "Intervention" for the first time in 2016 @ 11:21 @ http://thebestthatmoneycantbuy.org), and their ongoing and worsening (terminal?) tragedy ... and our Alternatives

1. "Those who cannot remember the past are condemned to repeat it." :
"Toolittle/toolatefortheCentralValley (and Monterey Bay's $5 billion+ annual production) &it'sAG?
Those who cannot remember the past are condemned to repeat it, like we have forgotten in the Monterey Bay w/ berries&Driscolls/Reiter (et al) instead of cotton&Boswells@ http://youtube.com/watch?v=I5uloOJ5m1o&feature=youtu.be
http://santacruzfoods.com

https://twitter.com/DouglasDeitch/status/1448627629557354500

Alternative#1 @ Living within our means @ http://dougdeitch.info , 1995 Zmudowsky Beach 43 acre Pilot Project @ http://dougdeitch.com & @ MBC @ CCC in 2011 @ https://www.youtube.com/watch?v=ija6HUdP-eY

2. "VAST majority of the water/food/RE resources of World's 5th biggest economy/Community are inextricably tied to SFBay/Delta/Sierra-Snowpak&CentralValleyag. CCC predicts 3.5ftSLR in 30 years@ http://documents.coastal.ca.gov/assets/slr/CCCendorsement_SLRPrinciples.pdf .
5:42@ http://pebblebeachrealestate.com Dr.Mount sez what 1 foot will do!"
https://twitter.com/DouglasDeitch/status/1374672809163550720

Question #1: If one foot of SLR will "salt up" the Delta, as Dr. Mount tells us in 2015, how, for example will this same one foot SLR affect our already overuse/critically overstressed local ground water commons? How is this above referenced projected CCC 3.5 feet SLR in next 30 years accounted for, if at all, in any current Monterey Bay GSA, particularly the only and first two and already approved ones in this or your, my, and GM/Santa Cruz Mayor Meyer's neighbor's and partner's "Mid County Ground Water Agency" and the sustainability of each's respective ground water basins and "sub basins"? Here's my recent comment to the CCC on this exact issue:

"Good Afternoon Dear Chair and Commissioners,

Please find my four (4) comments (in reverse order) I tendered last Friday, as described in the "Subject" of this email, and various attached images/articles/etc. w/ some repetition? (please excuse)

I hope you will have the opportunity to review them and watch the 12 minute VICE video @ I suggested you please review @ www.sandiegorealestate.com (and elsewhere) at the last real public in person meeting you had in March 12 of 2020, so long ago,

... @ minute/second 12:12 @ https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2020-03-12&mode=large&fbclid=IwAR1Fh5WDXG7kaFHIj0NvpnIe58Ry8zsMXnsOAd3cgJZ9poK5LjQjXQPqW-E

Best/health/tikkun olam,

Respectfully,

Douglas Deitch

MBC

831.476.7662

http://sipodemos.democrat

http://lomejorqueeldineronopuedecomprar.com

www.dougdeitch.info

-------- Forwarded Message --------
Subject: Fwd: Please add Additional Comment 4. + attached image (Fwd: Comments on "public review draft of Critical Infrastructure at Risk: Sea Level Rise Planning Guidance for California's Coastal Zone")
Date: Fri, 24 Sep 2021 15:17:27 -0700
From: ddeitch@pogonip.org
To: StatewidePlanning@coastal.ca.gov, Ddeitch

4. continued: Here is the MC Weekly 2018 article mentioned below @ https://www.montereycountyweekly.com/news/local_news/as-seawater-intrusion-advances-new-farmland-puts-marina-s-water-supply-in-peril/article_b35ca7e0-f66e-11e7-b541-57771b472126.html

"As seawater intrusion advances, new farmland puts Marina's water
supply in peril.

* David Schmalz

* Jan 11, 2018
* Along Highway 1 just north of Marina, what has been grassland for
decades is turning into row crops. A look at satellite images on
Google, stretching back to 1984, shows that farming on the property,
known as Armstrong Ranch, started in 2014 just south of the Marina
landfill.

Expect that trend to continue: On Nov. 21, 2017, Valle Del Sol Properties LLC bought 1,784 acres of Armstrong Ranch for $81.5 million. (Monterey County Assessor Steve Vagnini says the price per-acre, just over $45,000, is in keeping with local agricultural land values.)

Three new ag wells have been drilled on the property since 2015, and an application for another is currently being processed by the county. But here's the rub: The wells are pumping from an ancient, finite water source. It's the same water source that residents of Marina and the former Fort aquifers, named for their respective depths – is impaired by seawater intrusion, a process that occurs when excessive pumping creates a pressure differential that draws seawater into the aquifers, fouling their water with salt.

The only groundwater available to irrigate the property is in the so-called deep aquifer, an ancient groundwater supply 900-plus-feet underground that is not recharging through natural mechanisms. Scientists believe the water is probably more than 20,000 years old.

The only recharge to the deep aquifer, hydrologists say, comes from leakage from overlying aquifers. In the coastal area around Marina, those aquifers are already compromised by seawater intrusion, making them unusable as municipal or irrigation water supplies.

Pumping from the deep aquifer is considered “water mining,” and has long been viewed as a last-ditch water supply that is both expensive to tap – it costs upwards of $1 million to drill a well into it – and risky to rely on because its quantity is unknown. Yet Marina Coast Water District, which supplies the city of Marina and the former Fort Ord, pumps roughly 50 percent of its water from the deep aquifer. (In 2017, that came out to 1,587 acre-feet of 3,239-acre feet.)

In October, Howard Franklin, senior hydrologist with the Monterey County Water Resources Agency, presented six recommendations to the County Board of Supervisors to help combat worsening seawater intrusion.

Among those recommendations was a moratorium on new wells in the deep aquifer until a study determines its viability as a water supply..."

“All wells in the deep aquifer are of concern with respect to the recommendations,” Franklin says. “This is an urgent situation. This is imminent.”

According to Michael Cahn, an irrigation water resources adviser with UC Cooperative Extension in Salinas, an acre of strawberries requires about 2.5 to 3 acre-feet of water annually.

That means if the entire 1,784 acres were converted to strawberries, it would require in excess of 4,000 acre-feet of water annually – more than Marina Coast’s current annual production.

Franklin, when articulating the urgency of the situation for Marina Coast, and others that rely on the deep aquifer, says the human-caused mechanism of recharge for the deep aquifer – leakage from overlying aquifers – does not happen easily, or quickly, but that it will happen in a matter of years.

“The damage is being done now, and the impact of that damage could be 10 years from now, but if you [pump the deep aquifer] today, the damage will occur,” Franklin says.

Marina Coast does not have jurisdiction over new agricultural wells on Armstrong Ranch.

“It’s on our radar, and we’re concerned about it, but we’re not necessarily in the loop,” Marina Coast General Manager Keith Van Der Maaten says. “Unfortunately, I don’t think we’re as involved as we should be. We should have a more active role.”

The county’s Environmental Health Bureau processes applications for new wells, but while projects for residential water supplies face a gauntlet of bureaucratic hurdles, wells for agriculture are typically approved without any pushback.

That may change in the coming years with the formation of the Salinas Valley Groundwater Sustainability Agency, but ag wells in the region have so far have faced minimal regulation.

Marina Coast is currently exploring new potential water supplies, other than desalination. The agency is vying for up to $1 million in state grant funds – the grants will be awarded in February – to study water storage options in the aquifers around Armstrong Ranch.

The project would potentially seek to store excess winter flows in the Salinas River, which would make it similar to the Monterey Peninsula’s aquifer storage and recovery project in the Seaside Basin, where winter flows are pumped from Carmel River and injected underground.

Theoretically, Van Der Maaten says, Marina Coast could produce between 2,000-8,000 acre-feet of water annually with the project, and even send some of the water north to Castroville.

But he says there are still many unknowns, including whether it is technically feasible, whether Marina Coast could secure the water rights to those flows, and whether it would be economically feasible for Marina Coast to supply Armstrong Ranch farmland with water so that they stop pumping from the deep.

Van Der Maaten knows it won’t be easy, but the mission is clear: “We absolutely need to get into this deeper, and get people off the deep aquifer.”

---------- Forwarded Message --------

Subject: Please add Additional Comment 4. + attached images (Fwd: Comments on "public review draft of Critical Infrastructure at Risk: Sea Level Rise Planning Guidance for California's Coastal Zone")
Date: Fri, 24 Sep 2021 14:48:18 -0700
From: ddeitch@pogonip.org
To: Ddeitch , StatewidePlanning@coastal.ca.gov

4. The recent September 20, 2021 presentation by USGS and CCC staff (see attached images) on ground water and Sea Level Rise underlines and emphasizes the unadvisability and inherent risks and unknowns involved with our too many recent non DPR recycled water supply projects like Pure Water Monterey, Soquel, San Diego caused by sea level rise invading our ground waters despite our best efforts and intentions to prevent this.

At minute/second 5:41 @ the 12 minute VICE video at http://www.sanfranciscorealesatate.com , Dr. Jeff Mount in 2015 explains what just one foot of SLR will do to the Delta and the CCC plans for 3.5 feet SLR by 2050 (@ https://documents.coastal.ca.gov/assets/slr/CCCendorsement_SLRPrinciples.pdf) . So, just imagine what that same 1 foot of SLR will do to our coastal ground water, particularly in our already critically overdrafted coastal ground water basins and related new water supply infrastructure.

Now add to this uncontrolled and unplanned for increased ag coastal well pumping for new ag, such as is presEnt in the Pure Water Monterey area described in this Monterey Weekly article from a couple of years ago which will, at 5400 acre feet per year, completely offset the cleaned injected recycled water in the Monterey Pure Water expanded project.

-------- Forwarded Message --------
Subject: Comments on "public review draft of Critical Infrastructure at Risk: Sea Level Rise Planning Guidance for California's Coastal Zone"
Date: Fri, 24 Sep 2021 06:33:31 -0700
From: Douglas Deitch
To: StatewidePlanning@coastal.ca.gov, Ddeitch

"Thosewhocannotrememberthepast https://youtu.be/I5uloOJ5m1o can't adapt to 3.5' in30yrSLR? @ https://twitter.com/DouglasDeitch/status/1374672809163550720 toprotectvastmajoritywater/food/re assets w/o 1. http://sipodemos.democrat 2. http://dougdeitch.info : https://t.co/2L1RYOqKrI http://dougforassembly.com ?" (https://twitter.com/DouglasDeitch/status/1426946751336914944)

Comments on "public review draft of Critical Infrastructure at Risk: Sea Level Rise Planning Guidance for California's Coastal Zone : "This Guidance focuses on adaptation of transportation infrastructure (Chapter 5) and water infrastructure (Chapter 6), including highways, roads, railroads, wastewater, stormwater, and water supply infrastructure."

1. "VAST majority of the water/food/RE resources of World's 5th biggest economy/Community are inextricably tied to

nt_SLRPrinciples.pdf . 5:42@ http://sandiegorealestate.com Dr.Mount sez what 1 foot will do!" @ https://twitter.com/DouglasDeitch/status/1374672809163550720 :

Analysis & Conclusions: Due to this 2020 3.5 ft. SLR by 2050 "planning guideline/projection" (and other reasons like possible COVID19 and other possible contamination of our waste waters which cannot be cleaned (@ https://twitter.com/DouglasDeitch/status/1426593026571313152)

Additionally, this is why we must immediately begin investigation of feasibility and advisability of damming the Golden Gate run down @ http://sipodemos.democrat @ Linkedin:

CA - DWR

You Retweeted

Fair&Balanced! @ MakeCaliforniaGreatAgain.DEMOCRAT
@DouglasDeitch

Replying to
@CA_DWR
#CaWaterBoards
https://twitter.com/DouglasDeitch/status/1401916742541013000

DPRisbest! like @ my "NAUTURAL SOLUTION" @ http://dougdeitch.info and 21000 acre Monterey Bay Estuarine Nat'l Monument in the Monterey Bay, which will include up to 31k/a/f/yr from Castroville Reclamation Plant repurposed to urban, recharge, and conservation uses from ag use in perpetuity, to wit:

https://twitter.com/DouglasDeitch/status/1411648137878380551

*"Douglas Deitch, Balanced Law and Order Liberal Democrat for State
Senator*

September 14, 2019 ·
WELCOME TO www.DOUGDEITCH.info !!! ... Best SUSTAINABLE Monterey Bay region "SLR" (Sea Level Rise) water solution?
lomejorqueeldineroNOpuedecomprar.com /
lawandorderliberal.org
My 21,000 acre "Monterey Bay Estuarine National Monument" , etc. 'Water Fix" ..., of course.
The Castroville reclamation plant/project, run down @

1998 for around $75 million in Castroville.
This 31,000 acre feet/yr of water will be repurposed to urban use, further cleaned, processed, and distributed regionally and will easily supply and service all current and future Montrey Bay regionally urban water needs.
This will be accomplished by using the 12000 acres of land associated with this 31000 a/f/yr of water to it's highest and best use.
At present, this water is dedicated to exclusively ag use on 12,000 coastal ag acres at the mouth of the Salinas Valley to use instead of well water pumped at this location to protect the Salinas Valley from further salt water intrusion. As farmland, this land is FMV worth around $50,000 per acre as farmland (https://www.santacruzsentinel.com/.../retired-federal.../). However, this 12,000 acres highest and best use is not as farmland but instead as a ground water conservation/aquifer recharge/ and estuarine habitat conservation/rehabilitation project, which actually doubles the FMV of this land to $100,000 per acre or $1.2 billion.
This land comprises roughly something under 5% (?) of irrigated farmland in the "Salinas Valley"
If this 12000 acres was publicly acquired and fallowed/or all well pumping ceased, along with another tract of 9000 acres of irrigated farmland at the mouth of the Pajaro Valley running from approximately Elkhorn Slough to Manresa Beach on the ocean side of Highway One in Santa Cruz County for 21000 acres in total to protect the Pajaro Valley from salt water intrusion in the same way, ag well pumping would stop on this 21000 acres and, @ 3 a/f/yr per acre for ag water, 63,000 a/f/yr of ground water, would be CONSERVED annually per year in perpetuity. Additionally, wouldn't this 63,000 a/f/yr be also de facto RECHARGED at these two most hydrologically critically important locations with the highest quality recharge water possibly available with the lowest cost and best "GREEN tech" water available possible anywhere, in perpetuity as well, ... the recharge water produced and recharged naturally by our best water purveyor named Ms. Mother Nature?
Correct.
This is what I call the "Monterey Bay Estuarine National Monument", and it is truly a national monument with the highest concentration of critically threatened critical estuarine resources and habitat of ANY LOCATION ANYWHERE IN THIS COUNTRY !!! Here's my already successful 25 year old "Pilot Project" @ "Willoughby Ranch" @ Zmudowski Beach @ to check out @ www.dougdeitch.com & www.dougdeitch.info (this page)... "Farmlands back to wetlands"
Query: Where's the $2.1 billion?
Response: Reallocated rail bond money billions to "water/habitat/environmental projects" aka "OPM" (...other people's money) and INFRASTRUCTURE FUNDING.

2. "I wonder what the latest SCIENCE is today re:"Removing the novel coronavirus from the water cycle"& our ground water injection of "cleaned"? recycled/injection water projects like "Pure Water Soquel"? Monterey San Diego etc? @
https://twitter.com/DouglasDeitch/status/142659302657131

3152/photo/1 ?

3. SWRCB must intervene in Monterey Bay immediately to achieve sustainability and proper, legal, and responsible water management in the entire Monterey Bay @ https://twitter.com/DouglasDeitch/status/1375814806364594178/photo/1

Respectfully submitted,
Douglas Deitch

ED/Monterey Bay Conservancy

540 Hudson Lane, Aptos, Ca., 95003

831.476.7662"

Question #2:This 2018 Monterey County Weekly article @ https://www.montereycountyweekly.com/news/local_news/as-seawater-intrusion-advances-new-farmland-puts-marina-s-water-supply-in-peril/article_b35ca7e0-f66e-11e7-b541-57771b472126.html#comments cites around 1800+/- new acres of ag & new well pumping @ 5400 a/f/yr which seems to approximately cancel/use up all the new Monterey One ASR water? ... Any unanticipated problems, present or future conflicts/miscalculations, etc in this regard here or not?

Please watch my most recent and 5th request for SWRCB INTERVENTION IN THE ENTIRE MONTEREY BAY water management and "control" just on August 3, 2021 @ 9:48 @ https://www.youtube.com/watch?v=A9KTIa0RDu8&t=919s and @ https://twitter.com/DouglasDeitch/status/1422889479061196803, my first request @ 11:21 @ www.thebestthatmoneycantbuy.org pictured below from April/2015, over SIX years ago, and please REVIEW the documents I am holding in my hand I presented and went through w/ SWRCB 4/16/15 during my presentation and first request for SWRCB INTERVENTION then @ http://www.dougforassembly.com , which only ONE current SWRCB board MEMBER then, Ms. Doreen D'Adamo, was present for?

... to be continued.
Respectfully,
Douglas Deitch/MBC
siddhartha1002@gmail.com

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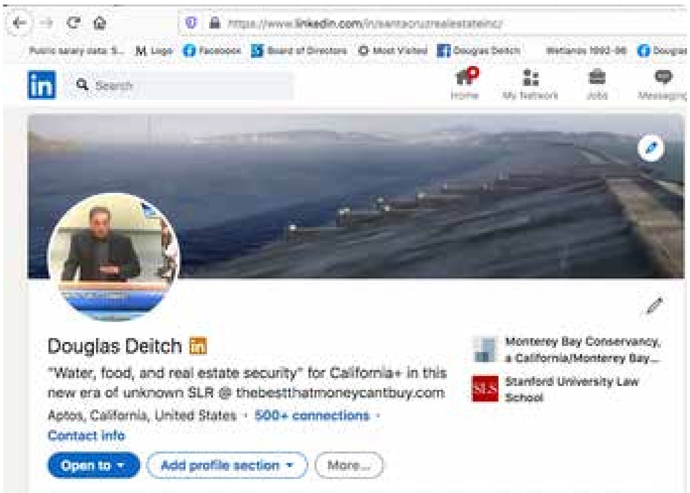
Douglas Deitch 8-10-2011...California Coastal Commission Public Comment Ground Water
CAL-SPAN.ORG
08-10-2011
3. GENERAL PUBLIC COMMENT
CALIFORNIA COASTAL COMMISSION


Douglas Deitch: Damming the Golden Gate??? ... (PLEASE SHARE THIS WITH 5 PEOPLE and request they do the same?...)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Douglas Deitch
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LOCAL
Water activist sues county board
Panel seeks school
"Tikkun Olam..."?
Sentinel
County water supplies dwindle
COUNTY OF SANTA CRUZ
8:39 AM · Aug 8, 2021 · Twitter Web App


INFORMATIONAL BRIEFING:
UNDERSTANDING SLR RELATED GROUNDWATER CHANGE


The Relevance of Sea Level Rise
Over 1 billion people are expected to live in the coastal zone by 2050
SLR will likely cause 'once-in-a-lifetime' coastal flooding events to occur annually by 2050, and every day by 2100
When including storms and coastal change, ~3 times more people would be at risk
In California
26 million residents in coastal counties
Over 600,000 people and $200 billion in property at risk by 2100 (6% of GDP!)
These potential impacts are ~ 10 times greater than the worst wildfires and earthquakes in California history
USGS


Tweet

You Retweeted

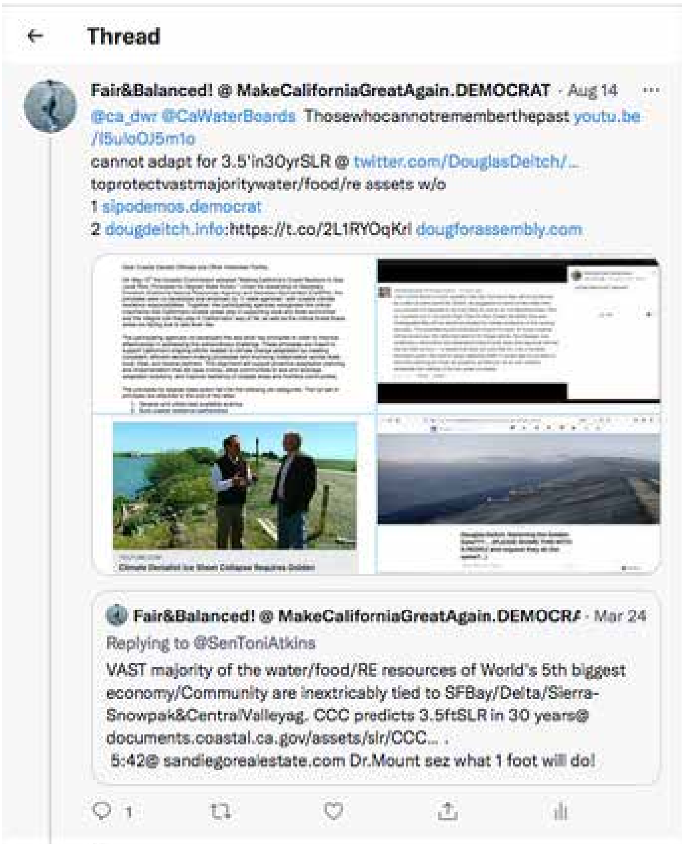
MakeCaliforniaGreatAgain.DEMOCRAT @DougDeitch.info
@DouglasDeitch

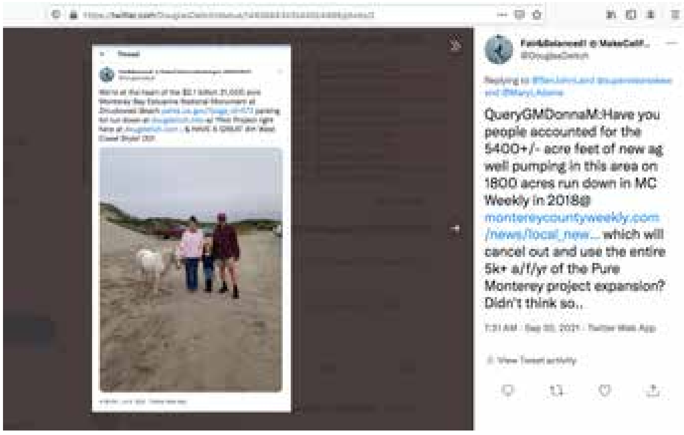
#covid19 contamination risks still! MakeCaliforniaGreatAgain.Democrat @SenToniAtkins @GavinNewsom @vp @SenFeinstein @SenAlexPadilla @Rendon63rd @SupervisorAlejo @RyanCoonerty @swrcb thebestthatmoneyCANTbuy.org @11:21 dougdeitch.info /.com pebblebeachrealestate.com sipodemos.democrat

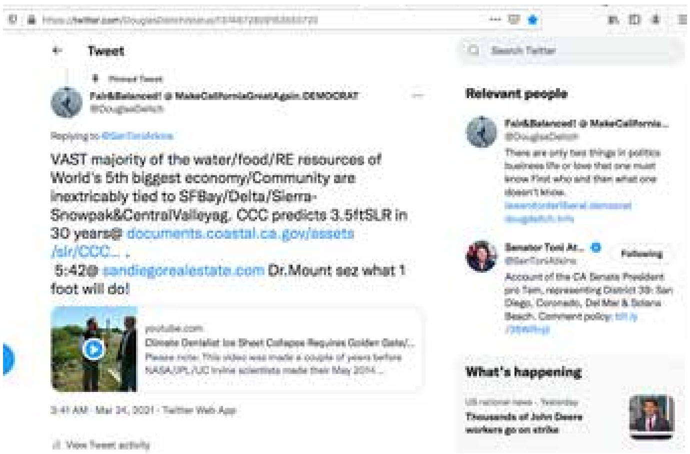
MakeCaliforniaGreatAgain.DEMOCRAT @DougDeitch.info · Jun 2, 2020
#covid19 Despite our SWRCB in Cali assuring us, it's in our treated sewage and recycled water now being injected into our ground water commons for their next tragedy run down "Removing the novel coronavirus from the water cycle" @ sciencedaily.com/releases/2020/... youtube.com/watch?v=2W_zby...
Show this thread

YOUTUBE.COM
SWRCB Board Meeting May 19, 2020

7:59 AM · Jun 7, 2021 · Twitter Web App


Thread
Fair&Balanced! @ MakeCaliforniaGreatAgain.DEMOCRAT · Aug 14
@ca_dwr @CaWaterBoards Thosewhocannotrememberthepast youtu.be/I5uloOJ5m1o
cannot adapt for 3.5'in30yrSLR @ twitter.com/DouglasDeitch/...
toprotectvastmajoritywater/food/re assets w/o
1 sipodemos.democrat
2 dougdeitch.info:https://t.co/2L1RYOqKrl dougforassembly.com
Fair&Balanced! @ MakeCaliforniaGreatAgain.DEMOCRA · Mar 24
Replying to @SenToniAtkins
VAST majority of the water/food/RE resources of World's 5th biggest economy/Community are inextricably tied to SFBay/Delta/Sierra-Snowpak&CentralValleyag. CCC predicts 3.5ftSLR in 30 years@ documents.coastal.ca.gov/assets/slr/CCC... .
5:42@ sandiegorealestate.com Dr.Mount sez what 1 foot will do!
1


QueryGMDonnaM:Have you people accounted for the 5400+/- acre feet of new ag well pumping in this area on 1800 acres run down in MC Weekly in 2018@ montereycountyweekly.com/news/local_new... which will cancel out and use the entire 5k+ a/f/yr of the Pure Monterey project expansion? Didn't think so..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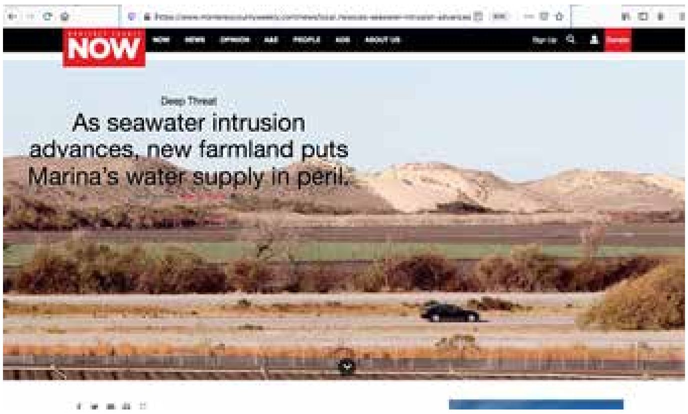
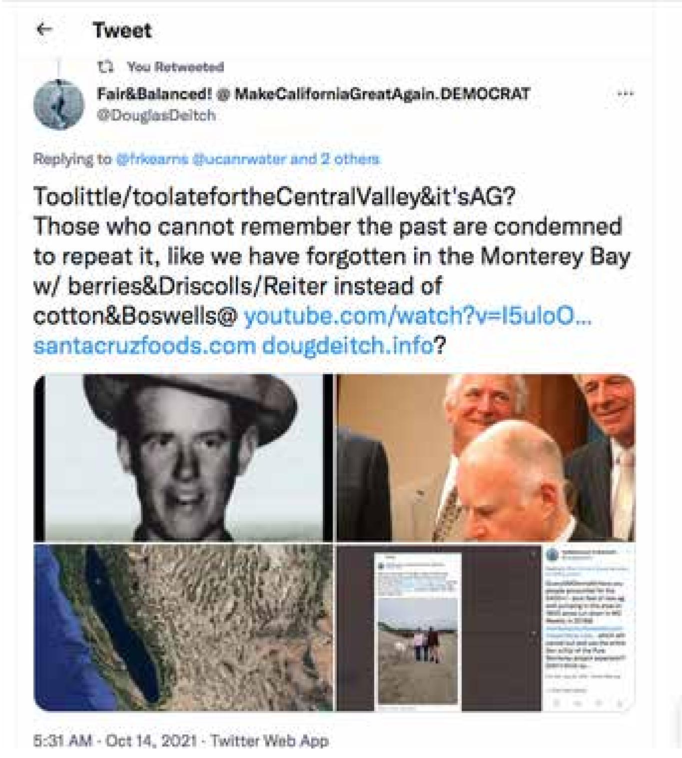
Fair&Balanced! @ MakeCaliforniaGreatAgain.DEMOCRAT
VAST majority of the water/food/RE resources of World's 5th biggest economy/Community are inextricably tied to SFBay/Delta/Sierra-Snowpak&CentralValleyag. CCC predicts 3.5ftSLR in 30 years@ documents.coastal.ca.gov/assets/slr/CCC... .
5:42@ sandiegorealestate.com Dr.Mount sez what 1 foot will do!
Relevant people
What's happening


NOW
Deep Threat
As seawater intrusion advances, new farmland puts Marina's water supply in peril.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@DouglasDeitch
Replying to @frkearns @ucanrwater and 2 others
Toolittle/toolatefortheCentralValley&it'sAG?
Those who cannot remember the past are condemned to repeat it, like we have forgotten in the Monterey Bay w/ berries&Driscolls/Reiter instead of cotton&Boswells@ youtube.com/watch?v=I5uloO... santacruzfoods.com dougdeitch.info?
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August 6 ·

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Monterey Bay Conservancy
August 27, 2018 ·

"It's past time for the State Water Resources Control Board to take control of our now predominantly below sea level Monterey Bay ground water commons..." https://www.linkedin.com/.../its-
hFRwxZIzGSPuoFx5b6R_jsixz-IB5meE6-tz-ScLicdl_RupVKolXxw-cqFX2DyZFouT

STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY — GAVIN NEWSOM, Governor

CALIFORNIA COASTAL COMMISSION
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5200
FAX (415) 904-5400

May 22, 2020

Dear Coastal Elected Officials and Other Interested Parties,

On May 13th the Coastal Commission adopted "Making California's Coast Resilient to Sea Level Rise: Principles for Aligned State Action." Under the leadership of Secretary Crowfoot (California Natural Resources Agency) and Secretary Blumenfeld (CalEPA), the principles were co-developed and endorsed by 17 state agencies[1] with coastal climate resilience responsibilities. Together, the participating agencies recognized the critical importance that California's coastal areas play in supporting local and state economies and the integral role they play in Californians' way of life, as well as the critical threat these areas are facing due to sea level rise.

The participating agencies co-developed the sea level rise principles in order to improve effectiveness in addressing this extraordinary challenge. These principles are meant to support California's ongoing efforts related to climate change adaptation by creating consistent, efficient decision-making processes and improving collaboration across state, local, tribal, and federal partners. This alignment will support proactive adaptation planning and implementation that will save money, allow communities to test and leverage adaptation solutions, and improve resiliency of coastal areas and frontline communities.

The principles for aligned state action fall into the following six categories. The full set of principles are attached to the end of this letter.

1. Develop and utilize best available science
2. Build coastal resilience partnerships
3. Improve coastal resilience communications
4. Support local leadership and address local conditions
5. Strengthen alignment around coastal resilience
6. Implement and learn from coastal resilience projects

Among other important goals, the Principles include an ambitious target for the year 2050 of preparing for 3.5 feet of sea level rise. Although this is not a new sea level rise projection, this planning target will help encourage state agencies and others to begin now to proactively prepare for the sea level rise that is anticipated to occur over short-, medium-, and long-term time horizons.

COMMUNITY WATER CENTER
EL CENTRO COMUNITARIO POR EL AGUA

San Jerardo
Cooperative,
Inc.

October 15, 2021

Salinas Valley Basin Groundwater Sustainability Agency
Submitted electronically to:
Emily Gardner, Deputy General Manager
Donna Meyers, General Manager

Subject: Comments on the Draft Salinas Valley Subbasin GSPs for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins

Dear Salinas Valley Basin Groundwater Sustainability Agency:

The Community Water Center (CWC) and the San Jerardo Cooperative offer comments and recommendations in response to the draft Groundwater Sustainability Plans (GSPs) for the Langley, East Side, Forebay, and Upper Valley Subbasins as released in the Fall of 2021 by the Salinas Valley Basin Groundwater Sustainability Agency (SVB GSA). Previously, we submitted comments on April 23, 2021 regarding Chapters 1-8, on April 28, 2021 on a preliminary draft of Chapter 9, and on June 17, 2021 regarding Chapters 2, 9, and 10.

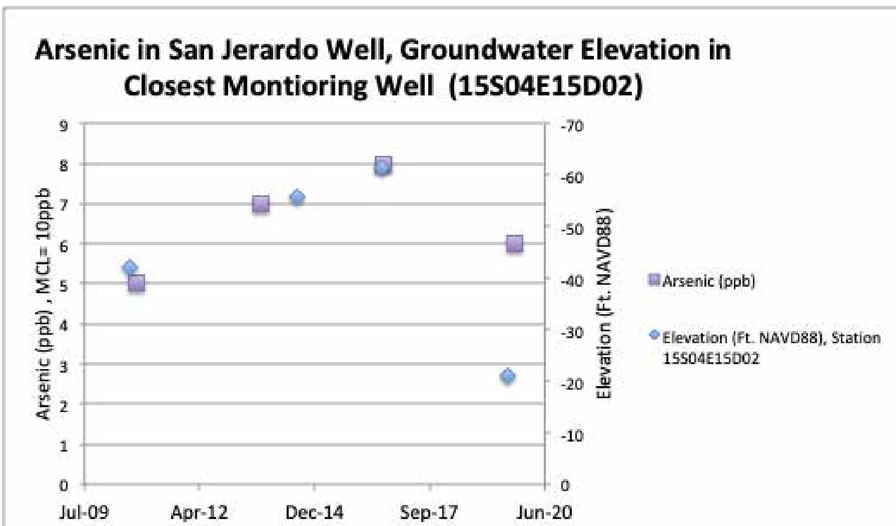
Because the Subbasin GSP drafts are now to be reviewed and voted upon by the SVB GSA Board, we take this opportunity to synthesize many of our comments into one document and provide relevant updates based on SVB GSA Staff responses and our answers in turn. Responses included here from SVB GSA, unless otherwise cited, were published in the Comment Letter Comment Tables responding to public comments made mid-2021 when drafts were prepared for the Subbasin Committees.[1] Additionally, unless otherwise noted, GSP Section numbers refer to the Eastside Subbasin GSP and the comments apply to all SVB GSA subbasins. As always, these comments are intended to add to the public record and are submitted in addition to previous written and spoken comments.

We reiterate the following context for this comment letter and the San Jerardo Cooperative's participation in particular. The challenges facing San Jerardo and similar communities throughout all the Subbasins in the Salinas Valley are the foundation of our comments in this letter. The San Jerardo Cooperative's well is highly vulnerable to changes in groundwater levels and groundwater quality. Over decades of living and working at San Jerardo Cooperative, Advisory Committee Member Horacio Amezquita has observed firsthand how the irrigation practices on properties surrounding the cooperative impact the water quality in their current and former wells. The San Jerardo Cooperative receives drinking water from a small public water system (CA2701904) and is very concerned that

[1] SVB GSA. (2021). *Subbasin GSP Comment Letter Comment Tables*. On file with SVB GSA and available at: svbgsa.org. *See e.g.*, https://svbgsa.org/wp-content/uploads/2021/08/Eastside-Comment-Letters-Responses-081021.pdf.

pumping, irrigation practices, and groundwater management in the East Side Subbasin will cause their drinking water well, which currently meets all drinking water standards, to exceed the maximum contaminant levels for arsenic and/or nitrate. Unfortunately, data from the State Water Board indicates increasing levels of nitrate and arsenic in their well with a high arsenic level of 8 ppb on 8/22/2016 that also corresponds to a low groundwater elevation of -61.5 in Station 15S04E15D02, the closest monitoring well to the San Jerardo Cooperative's well (See CWC Figures 1 and 2).[2] While there are too few monitoring data points to draw significant conclusions, CWC Figure 1 does suggest that arsenic levels are higher when groundwater levels are lower. Scientific studies confirm that contaminants like arsenic, uranium, and chromium (including hexavalent chromium) are more likely to be released under certain geochemical conditions influenced by pumping rates, geological materials, and water level fluctuations.[3]

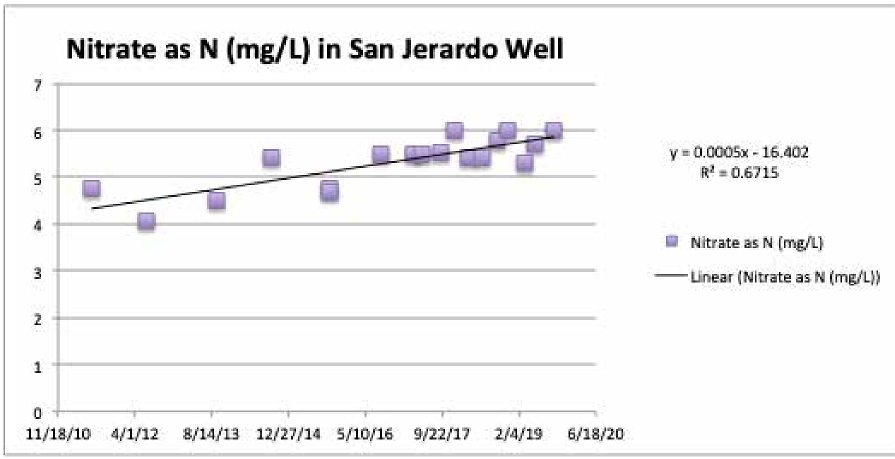
CWC Figure 1: Arsenic in San Jerardo Well, Groundwater Elevation in Closest Monitoring Well
(Note: The groundwater elevation y-axis is reversed to illustrate that lower groundwater elevations are associated with higher arsenic levels.)



[2] CWC Figure 1 contains all available arsenic data from the State Water Board's Drinking Water Watch online database (https://sdwis.waterboards.ca.gov/PDWW/) which was collected in October 2010, 9/11/13, 8/22/16, and 9/23/19. We then added the monitoring data for Station 15S04E15D02 for the dates most close to the arsenic sampling dates (August 2010, August 2014, August 2016, and August 2019). CWC Figure 2 data was also downloaded from the same online database.

[3] Community Water Center and Stanford University (2019). *Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium*. Available at: https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

CWC Figure 2: Nitrate in San Jerardo Well.



We provide more specific chapter-by-chapter comments below. We emphasize that the GSP must be revised throughout to further incorporate the best available science[4] showing that groundwater pumping and groundwater level changes can influence water quality, and the GSA has obligations to prevent the significant and unreasonable exacerbation of degraded water quality. We also note that a management decision to *not* regulate pumping and to therefore permit current pumping rates is still a management decision. This recommendation is supported by DWR's 180/400 ft Aquifer GSP Determination on June 3, 2021:

> "**[S]taff find that the approach to focus only on water quality impacts associated with GSP implementation, i.e., GSP-related projects, is inappropriately narrow.** Department staff recognize that GSAs are not responsible for improving existing degraded water quality conditions. **GSAs are required; however, to manage future groundwater extraction to ensure that groundwater use subject to its jurisdiction does not significantly and unreasonably exacerbate existing degraded water quality conditions.**
> Where natural and other human factors are contributing to water quality degradation, the GSAs may have to confront complex technical and scientific issues regarding the causal role of groundwater extraction and other groundwater management activities, as opposed to other factors, in any continued degradation; but **the analysis should be on whether groundwater extraction is causing the**

[4] 23 CCR § 355.4(b)(1). "When evaluating whether a Plan is likely to achieve the sustainability goal for the basin, the Department shall consider the following:
(1) Whether the assumptions, criteria, findings, and objectives, including the sustainability goal, undesirable results, minimum thresholds, measurable objectives, and interim milestones are reasonable and supported by the best available information and best available science."

> **degradation in contrast to only looking at whether a specific project or management activity results in water quality degradation**.
> Department staff recommend that the SVBGSA coordinate with the appropriate water quality regulatory programs and agencies in the Subbasin to understand and **develop a process for determining when groundwater management and extraction is resulting in degraded water quality in the Subbasin** (see Recommended Corrective Action 5)."[5]

We strongly recommend that the GSPs incorporate a more robust and representative monitoring network and minimum thresholds to protect vulnerable communities like San Jerardo and those dependent on shallow domestic drinking water wells. This network should include state and local small water systems. In tandem, we recommend the incorporation of a Well Impact Mitigation Program, as discussed below.

Thank you for reviewing this letter and for the consideration of our comments on the draft GSP chapters. We look forward to working with the SVB GSA to ensure that the GSPs are protective of the drinking water sources of vulnerable, and often underrepresented, groundwater stakeholders. Please do not hesitate to contact us with any questions or concerns. We also look forward to meeting with you in the future to further discuss issues raised in these and past comments.

Sincerely,

Heather Lukacs

Heather Lukacs
Community Water Center

Horacio Amezquita

Horacio Amezquita
General Manager, San Jerardo Cooperative, Inc.

Justine Massey

Justine Massey
Community Water Center

Mayra Hernandez

Mayra Hernandez
Community Water Center

[5] Department of Water Resources. (2021). *Statement of Findings Regarding the Approval of the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan.* Pp. 26-27. (Internal citations omitted; emphasis and paragraph breaks added). Available for download at: https://sgma.water.ca.gov/portal/gsp/status.

GSP Chapter 2: Communications and Public Engagement

SGMA requires GSAs to consider all beneficial users in groundwater management decisions and specifically names domestic well users and disadvantaged communities (DACs) as beneficial users.[6] SGMA also requires GSAs to "encourage the active involvement of diverse social, cultural, and economic elements of the population within the groundwater basin *prior to and during the development and implementation of the groundwater sustainability plan."*[7] The regulations similarly require that a GSP summarize and identify, "opportunities for public engagement and a discussion of how public input and response will be used."[8] The GSA thus must engage, "diverse social, cultural, and economic elements of the population within the basin."[9] SGMA Regulations recognize that failure to engage adequately with a diverse cross-section of the public undermines the likelihood that a GSP will avoid undesirable results and meet its sustainability goal.[10]

Community Water Center appreciates the statement found in Chapter 2 of the Langley, Eastside, Forebay, and Upper Valley subbasins: "[T]he success of the... Subbasin GSP will be determined by the collective action of every groundwater user."[11] Public engagement invites citizens to get involved in deliberation and to take action on public issues that are important to them. More importantly, it helps leaders and decision-makers have a better understanding of the perspectives, opinions, and concerns of citizens and stakeholders, especially those who are traditionally underrepresented. DWR's Guidance for Stakeholder Communication and Engagement acknowledges that public engagement, when done well, goes far beyond the usual participants to include those members of the community whose voices have traditionally been left out of political and policy debates.[12] Additionally, as part of a Strategic Planning Review, SVB GSA has recently recognized an overrepresentation of agricultural interests in its GSP formation process and voiced interest in balancing its representation, however has not yet taken action to do so. In this light, we offer the following recommendations:

- **Fast-track stakeholder outreach efforts in order to meaningfully engage beneficial users throughout the basin in the GSP development process currently underway.**
    - Based on our review of the language in Chapter 2 of the Subbasin GSPs, it appears that the outreach and engagement strategies outlined in Section 2.7, which are specific to the underrepresented communities and disadvantaged communities in the Basin, are to be put in place only after the GSP is submitted in 2022.

---

[6] Cal. Water Code § 10723.2.
[7] Water Code § 10727.8. (Emphasis added).
[8] 23 CCR § 354.10(d)(2).
[9] DWR (2018). *Guidance Document for Groundwater Sustainability Plan: Stakeholder Communication and Engagement.* P. 1. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Assistance-and-Engagement/Files/Guidance-Doc-for-GSP---Stakeholder-Communication-and-Engagement.pdf.
[10] 23 CCR §355.4(b)(4).
[11] SVB GSA (2021). *Subbasin GSPs Draft - Chapter 2: Goals for Communication and Public Engagement.* P. 10 (in all drafts). Available at: https://svbgsa.org/subbasins/.
[12] DWR (2018). *Guidance Document for Groundwater Sustainability Plan: Stakeholder Communication and Engagement.* Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Assistance-and-Engagement/Files/Guidance-Doc-for-GSP---Stakeholder-Communication-and-Engagement.pdf.

    - This delay results in little to no participation or input from these communities during the GSP development process currently underway.
- Update: While SVB GSA held workshops with DAC representatives to develop a plan for outreach to DACs, **the resulting plan to solicit DAC input regarding the core management decisions in the GSP—including the setting of SMCs and the representative monitoring network—was *not* implemented during GSP development.** Consulting DAC stakeholders solely in regards to outreach strategies is not sufficient engagement. It is likely that due to SVB GSA's lack of implementation of their outreach strategy plan[13] many DAC voices and opinions have been left out of this current GSP because DAC residents have not been made aware of this process. Even if they are aware of the GSP process, many still lack the information and tools they need to participate. It is critical to have DAC stakeholders engaged in the development of the GSP as well as on a continuing basis.
    - Section 2.4 asserts that SVB GSA "deployed… [an] inclusive outreach and education process conducted that best supports the success of a well- prepared GSP that meets SGMA requirements." However, acknowledging that initial steps were taken, the GSA has not provided evidence of carrying out this outreach and fulfilling SGMA requirements.
- **Specify which outreach strategies will be used to reach underrepresented communities and disadvantaged communities.** The proposed goals for communication and engagement actions and strategies in this chapter lack important details to ensure that all beneficial users, especially underrepresented communities and disadvantaged communities, will have access to the resources that are being proposed. It must be noted that underrepresented communities and disadvantaged communities may not have access to the internet, therefore they may not have access to the online resources on either the SVB GSA website or through social media. Additionally, in the case that they do have access to the internet, they may lack knowledge or familiarity regarding how to access the online resources.
- **Provide a strategy for how to reach stakeholders with limited or no SGMA knowledge.** In Subbasin GSPs' Section 2.6.3, SVB GSA acknowledges that there is a "variety of audiences targeted within the Basin whose SGMA knowledge varies from high to little or none." However, no strategy is provided for how those with no knowledge will be reached. This chapter should be modified to include more details on how and what additional strategies will be implemented to ensure that SVB GSA is reaching all beneficial users. We recommend the following approaches:
    - **Include more grassroots-based approaches to request and incorporate DAC and drinking water user feedback in the GSP, which are critical to actually reaching stakeholders and fulfilling the GSA's goal.** One of the goals of the Communications and Public Engagement (CPE) Actions which we strongly support is to "invite input from the public at every step in the decision-making process and provide transparency in outcomes and recommendations." However, based on the communication/ outreach strategies mentioned in the chapter, efforts fall short of inclusivity. The general public

[13] As outlined in February 2021 SVB GSA Staff Report, Available at: https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/820418/Item_5a_-_Staff_Report.pdf.

does not always have access to certain resources like the internet, and even if they do have access they may not know how to use social media, use email, or browse the web.

- **Document and continue the policy of providing translation services at public meetings and of providing bilingual (English and Spanish) information and materials on the website, via email, and paper mail.** The Dymally-Alatorre Bilingual Services Act requires that public agencies serving over 10% of non-English speaking constituents provide appropriate translation services.[14] At a minimum, translated information should be provided during Plan updates and prior to critical decisions. In particular, the submitted GSP released during the formal comment period should include bilingual materials highlighting key summaries of the GSP. Critical decision points also include the adoption of groundwater fees, the approval of new groundwater projects or management actions, and decisions around pumping restrictions.
- **Consider inserting short notices in water bills and/or community newsletters on a monthly basis (notices should include key messages, visuals and information that is relevant to the average water user).** These notices must be translated as described above.
- **Specify how and when the accessible and culturally responsive GSA materials mentioned in Section 2.7 will be developed to communicate impacts of groundwater management on local water conditions and how they will be delivered or made available to URCs and DACs that do not have internet access.** Accessibility includes appropriate visual content and translation.
- **Consider using USPS every door direct mail (EDDM) to send out educational materials and updates to all stakeholders.** This tool can be used to map ZIP Code(s) and neighborhoods, it also has a filter feature that lets you filter by age, income, or household size using U.S. Census data. This tool can be helpful to reach stakeholders that do not have internet access.
- **Clearly identify and utilize existing community venues (on a monthly basis if possible) for community meetings, workshops, and events to provide information**. For example, the GSA could hold educational workshops during water board and school district board meetings, or after church services. Venues should be carefully selected in order to meet the needs of the targeted audience.
- **Clearly identify radio channels, social media avenues, websites, and other media outlets readily accessible to the community**. The submitted GSP should be revised with a policy requiring a broader outreach effort in the near future, with bilingual outlets.
- **Specify a timeline to work with key community leaders or trusted messengers on at least a monthly basis to distribute information and encourage community participation.** Venues for such leaders to share information could include churches, civic groups, clubs, non-profit organizations, and schools.
- **Consider hosting Spanish-only outreach meetings, as they can be more effective in transferring knowledge and receiving feedback.** It can be a challenge to provide

[14] California Government Code §7290.

real-time translation of technical groundwater terms and concepts in a way that is understandable and promotes participation, so it may be appropriate to conduct a meeting entirely in Spanish so that participants can be fully immersed in the discussion.

    - **Consider hiring a bilingual Stakeholder and Outreach Communication specialist as part of the SVB GSA staff.** Expanding the GSA's reach to different audiences and maintaining a robust stakeholder list of interested individuals, groups and/or organizations is a good step to ensure that the general public is informed about the GSA's activities. However, it will require substantial time and effort to develop a clear outreach methodology, obtain a representative list of stakeholders (including those who do not engage online), ensure language accessibility, and make sure stakeholders stay informed and engaged. A bilingual Stakeholder and Outreach Communication specialist could support this work.

- **We recognize and appreciate the inclusion of Appendix 2D Disadvantaged Communities in this draft of the subbasin GSPs. We recommend the following corrections / improvements to better represent DACs and their drinking water sources:**
    - **Clarify the number of domestic water systems that Monterey County Department of Environmental Health regulates under its Local Primacy Agency Authority as well as the local small water systems regulated under County Code.** See page 61 of the Eastside Volume 1 Appendices which states "There are approximately 160 such systems in the County regulated under this program."[15] This number is likely referring to the total number of public water systems serving less than 200 connections regulated by Monterey County but does not include state and local small water systems. From Monterey County's webpage on Small Water Systems "The Drinking Water Protection Services regulates Local and State Small Water Systems, which serve 2-14 connections. Many residents and visitors receive their water from these systems. Drinking Water Protection Services currently administers 969 systems, which serve about 4232 connections."[16]
    - Update the maps of **all disadvantaged communities (DACs) currently in Appendix 2D in the following ways:**
        - To reflect more recent census data from 2019 or later (the current map shows data from 2016). Continue to share the DAC/SDAC status of all census block groups, census designated places, and census tracts.
        - Include DAC or SDAC communities according to household income surveys conducted in accordance with state and federal agency guidelines to determine eligibility for state funding programs.
        - More clearly show the location of DACs, their drinking water sources, and their water quality in the subbasin including private wells. Figure 2 in Appendix 2D

[15] https://svbgsa.org/wp-content/uploads/2021/08/Eastside-Volume-1-Appendices.pdf

[16] https://www.co.monterey.ca.us/government/departments-a-h/health/environmental-health/drinking-water-protection/state-and-local

should combine data from GAMA and Monterey County to show the levels of COCs, including but not limited to nitrate, in recent years in drinking water sources in DAC areas. This would also provide data for Figure 2 in the Monterey County Subbasin which currently does not show any water quality data, because the Monterey Subbasin was not part of the geographic scope of the CCGS (2015) information included in the appendix.

- Update Figure 2 to show the entire Salinas Valley and not only the subbasins in the north. The Upper Valley Subbasin Volume 1 Appendices, for example, includes Figure 2 that does not show the Upper Valley subbasin.[17]

GSP Chapter 3: Description of Plan Area

The description of the plan area can be improved by clarifying the descriptions of the drinking water users in the area. In order to develop a GSP that addresses the needs of all beneficial users, it is critical that the location and groundwater needs of Disadvantaged Communities (DACs) and all drinking water users including domestic well communities are explicitly addressed early on in the GSP. In addition to comments previously submitted to the GSA on July 10, 2020, we recommend the following updates to this chapter:

- **Clarify the number and type of public water systems in the subbasins throughout the entire plan.** In each subbasin plan, there are discrepancies between types and numbers of public water systems in different chapters. It is absolutely critical to clearly include the number of public supply wells *currently in use* in the GSPs. For example, the East Side GSP lists the following:
    - Table 3-2 Well Count Summary shows “Public Supply= **24 wells**”
    - Table 5-3 GAMA Water Quality Summary shows "Number of Existing Wells in Monitoring Network Sampled for COC to be **78** for 123-TCP, **89** for Nitrate, and **70** for TDS.
    - Section 7.5 says "**Ninety** DDW wells have been chosen to be part of the RMS network. These wells are shown on Figure 7-4 and listed in Appendix 7D.” This table includes all DDW wells that were sampled for COCs between December 1982 to December 2019, yet it is unclear whether all these wells are still active, and after consulting Appendix 7D, it is unclear whether these wells are all public water system wells, as defined in Section 7.5, or whether wells of other types are also included.
    - Table 8-4 Groundwater Quality Minimum Thresholds - **No well count shown**.

  We recognize that different data sources have different limitations and recommend using the best available data consistently throughout the plan.
- Add a clear reference to a **table of all public water systems, their names, locations, number of connections, and number of active wells** in the text that is consistent with the numbers of wells in Table 3-2, Table 5-3, Section 7.5, and other locations where mentioned in the GSPs.

[17] See page 58 of Upper Valley Subbasin Volume 1 Appendices: https://svbgsa.org/wp-content/uploads/2021/08/Upper-Valley-Volume-1-Appendices-1.pdf)

    - Appendix 7-D: DDW and ILRP Wells in the Water Quality Monitoring Network should be updated to include the number of connections served by that well and the status of the well as active or inactive according to DDW.
- **Revise Section 3.6.2 on the Agricultural Order to indicate that Agricultural Order 4.0 includes monitoring requirements including on-farm domestic well monitoring of nitrate and 123-trichloropropane (123-TCP).** 123-TCP should also be included in the monitoring network (see comments in Chapter 7).

GSP Chapter 4: Hydrogeologic Conceptual Model

The hydrogeologic conceptual model is a key component of the basin setting. The basin setting represents the baseline assumptions that the GSA relies on throughout the GSP when choosing minimum thresholds, measurable objectives, and undesirable results, as well as when planning projects and management actions. We recommend that the GSA:

- **Revise Section 4.6 on Water Quality to acknowledge that "natural groundwater quality in the Subbasin" can be influenced by pumping and the way groundwater is managed.**[18] As indicated in our cover letter, this is of particular importance for the San Jerardo Cooperative who has experienced increases in nitrate and arsenic in their well.
    - SVB GSA response (Section 5.4.3): "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."
    - Our response: We appreciate the addition of a paragraph in Section 5.4.3 and recommend that this is also acknowledged in Section 4.6 since the topic of "natural groundwater quality" is being discussed. Furthermore, the release of arsenic into groundwater can be attributed to low dissolved oxygen levels, high rates of pumping, and an increase in pH. These changes can all be attributed to how groundwater is managed.

GSP Chapter 5: Groundwater Conditions

SGMA Regulations require: "Each Plan shall provide a description of current and historical groundwater conditions in the basin, including data from January 1, 2015, to current conditions, based on the best available information that includes the following: … (d) Groundwater quality issues that may affect the

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[18] Community Water Center and Stanford University, 2019. Factsheet "Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium" for more information.https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

supply and beneficial uses of groundwater, including a description and map of the location of known groundwater contamination sites and plumes."[19] We do not believe the GSA is meeting this requirement and recommend that the GSA make the following changes to Chapter 5 of all subbasin GSPs (East Side, Langley, Upper Valley, Forebay, and Monterey) to clearly represent current and past water quality conditions in the subbasin in order to inform the monitoring network, sustainable management criteria, planning, management actions, and projects.

Groundwater Quality Distribution and Trends

- **Clearly state in the introduction to Section 5.4 that the amount and location of pumping can impact groundwater quality distribution and trends.** We recommend including the following language in the letter submitted by the State Water Board to DWR regarding the 180/400 foot aquifer GSP (Dec. 2020): "Not all water quality impacts to groundwater must be addressed in the GSP, but significant and unreasonable water quality degradation due to groundwater conditions occurring throughout the subbasin, and that were not present prior to January 1, 2015, must be addressed in the GSP's minimum thresholds."[20] High rates of groundwater pumping can pull in contaminant plumes towards drinking water wells, cause the release of arsenic from the strata in the ground, and when shallow wells go dry or are too contaminated to use, new wells must be drilled into deeper portions of the aquifer where they are more likely to encounter high arsenic levels.[21] As previously mentioned, this is of direct concern to the San Jerardo Cooperative, which has observed increasing arsenic levels in their relatively new drinking water well, which was drilled to replace a more shallow well contaminated with nitrate and 123-trichloropropane.
    - SVB GSA response: "The SVBGSA does not have regulatory authority over groundwater quality and is not charged with improving groundwater quality in the Salinas Valley Groundwater Basin. Projects and actions implemented by the SVBGSA are not required to improve groundwater quality; however, they must not further degrade groundwater quality."[22]
    - Our response: CWC recommendation in this section is not to extend the GSA's responsibility to improving water quality. But if extraction rates that the GSA allows to occur result in water quality degradation, then that is within the GSA's responsibility to address. The GSA has explicit statutory authority and responsibility to prevent significant and unreasonable water quality degradation.[23] In line with this responsibility, DWR has instructed GSAs to map out where water quality issues exist in the basin, and to prevent

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[19] Cal. Code of Regulations § 354.16(d)
[20] DWR SGMA GSP Portal: https://sgma.water.ca.gov/portal/gsp/comments/29
[21] Community Water Center and Stanford University, (2019). *Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium*. Available at: https://www.communitywatercenter.org/sgmaresources.
[22] Salinas Valley Groundwater Sustainability Agency, Langley Area Subbasin GSP, p. 5-21.
[23] Cal Water Code § 10721, subd. (x)(4).

new impacts from occurring.[24] This includes managing contaminant plumes that may migrate or increase in concentration due to extraction rates and locations.

- **Include trend data for drinking water wells in the subbasins.** In some places, nitrate and other contaminants are increasing in drinking water wells. It is important to understand current contamination values and also whether well water quality is improving, staying the same or declining as well as the relationship of water quality to other sustainability indicators. As indicated by the data provided in this section, Monterey County maintains an exceptional dataset of water quality data for over 900 state and local small water systems serving 2-14 connections that should be utilized throughout the GSPs. Monterey County has sampled many small water systems for decades. CWC Figures 3 and 4 show nitrate concentrations increasing over time in two state small water systems in the East Side sub basin with high levels in one of the systems (Middlefield Rd. Water System #4) in 2015. Figure 5 illustrates arsenic concentrations in the Metz Road Water System #4 in the Forebay Subbasin. In some cases, data shows fluctuations and peaks in concentrations during the 2015-2016 timeframe. This is similar to the San Jerardo example shared previously. Further, the Central Coast Regional Water Board has analyzed data from their Irrigated Lands Regulatory Program to show that many wells across the region are showing increasing levels of nitrate concentrations and recent studies have confirmed that there is a link between decreased water quality and declining groundwater levels observed during times of drought.[25]
    - SVB GSA staff responded: "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."
        - Our response: : We maintain our position on the importance of including trend data as previously recommended because the way in which the GSA manages the basin impacts water quality. GSAs are responsible for monitoring water quality conditions in the basin and ensuring that they do not degrade beyond 2015 conditions.[26] The rate, timing, and location of pumping as well as fluctuations in groundwater levels overtime can result in the horizontal and

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[24] Dept. of Water Resources, 180/400 Foot Aquifer Groundwater Sustainability Plan Determination, (June 3, 2021), pp. 26-27.
[25] Draft Ag Order, Attachment A, 141-143. Available at: https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ag_waivers/docs/ag_order4_renewal/2021april/pao4_att_a_clean.pdf; *see also* U.S. Geological Survey (USGS). (Sept 2021). *Increased Pumping in California's Central Valley During Drought Worsens Groundwater Quality.* California State Water Resources Control Board's Groundwater Ambient Monitoring and Assessment Program (GAMA). Available at: https://www.usgs.gov/news/increased-pumping-california-s-central-valley-during-drought-worsens-groundwater-quality.
[26] Cal. Water Code §§ 10721 subd. (x)(4) and 10722.2 subd. (b)(4).

vertical migration of contaminant plumes into drinking water sources, including vulnerable private domestic wells.

- SVB GSA Staff replied: "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 may be a correlation within individual wells, like is seen in San Jerardo, however, that could be due to those other factors."
  - Our response: The current best available science[27] clearly links decreasing groundwater levels, including through overpumping of groundwater, to exacerbated degradation of groundwater quality. The U. S. Geological Survey (USGS) analyzed trends of increased pumping in California's Central Valley and further degradation of water quality and concluded that they are interlinked.[28] There is no reason to assume that the Central Coast would be subject to a hydrology so distinct as to negate the applicability of this finding to SVB GSA's groundwater management. Because of this established correlation, in instances of further water quality degradation, particularly when resulting in impacts to drinking water wells, SVB GSA should have the burden of proof to show that exacerbated water quality degradation is *not* linked to pumping practices, and identify the responsible source.
    - This is another example of why a more representative monitoring system for water quality (ie including SSWS and LSWS data from the Monterey County Environmental Health Department) would benefit Salinas Valley groundwater management, so that impacts can be identified and addressed in a highly localized manner. Additionally, even if the Subbasin GSPs plan to maintain current water levels, the GSA should be prepared to respond in case basin conditions do not evolve as planned and water quality degradation is exacerbated by ongoing pumping practices, including if hotspots (highly concentrated areas of

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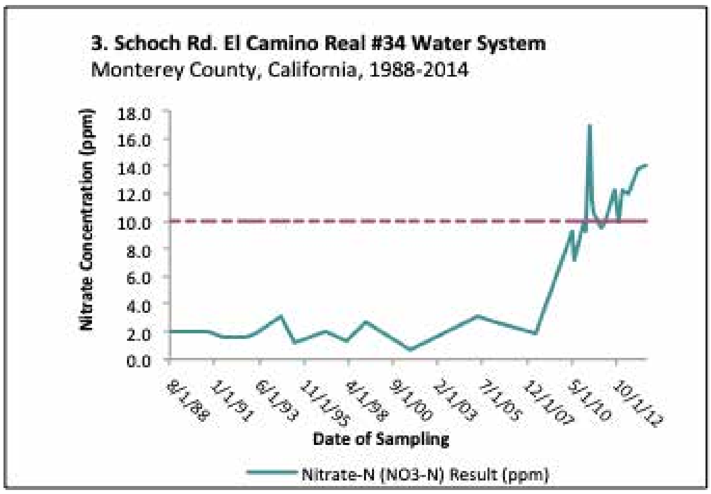
[27] 23 CCR § 355.4(b)(1). "When evaluating whether a Plan is likely to achieve the sustainability goal for the basin, the Department shall consider the following:
(1) Whether the assumptions, criteria, findings, and objectives, including the sustainability goal, undesirable results, minimum thresholds, measurable objectives, and interim milestones are reasonable and supported by the best available information and best available science."

[28] U.S. Geological Survey (USGS). (Sept 2021). *Increased Pumping in California's Central Valley During Drought Worsens Groundwater Quality.* California State Water Resources Control Board's Groundwater Ambient Monitoring and Assessment Program (GAMA). Available at: https://www.usgs.gov/news/increased-pumping-california-s-central-valley-during-drought-worsens-groundwater-quality.

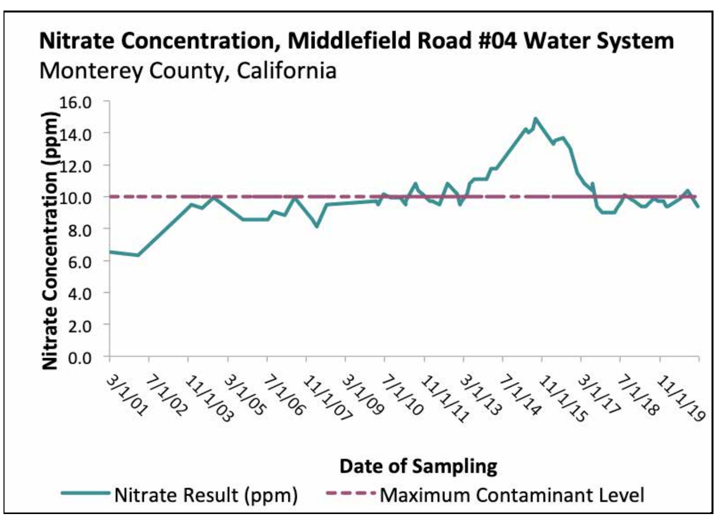
impact) of contamination form which impact drinking water beneficial users.

- We further request additional information be added to the GSP about the analysis conducted by the SVB GSA to understand the relationship between groundwater quality and groundwater levels. It is not sufficient to say this analysis was conducted without also providing the public information about the data sources, methods, and findings.

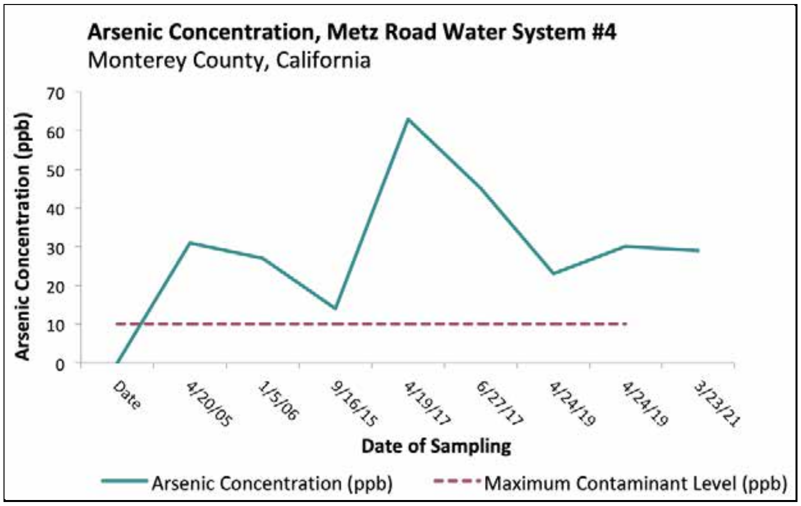
CWC Figure 3: El Camino Real WS #34 - Nitrate as N, East Side Subbasin



CWC Figure 4: Middlefield Road WS #4 - Nitrate as N, East Side Subbasin



CWC Figure 5: Metz Road Water System #4, Arsenic, Forebay Subbasin



- **Revise Section 5.4 to include a specific discussion, supported by maps and charts, of the spatial or temporal water quality trends for all constituents that have been detected in the subbasin and may affect drinking water beneficial users, as required under 23 CCR § 354.16(d).** This section should include water quality data (both in map and tabular form) for all constituents (where available) with primary drinking water standards that have been detected in the subbasin including, but not limited to, **nitrate, 123-trichloropropane, hexavalent chromium,[29] arsenic, uranium, and perchlorate for all public drinking water wells, state and local small water system wells, and private domestic wells.** It is especially important for all groundwater stakeholders to be able to understand and visualize the location of contaminant hotspots throughout each subbasin.
    - **Present maps and supporting data for all constituents of concern.** The review of water quality data in the groundwater conditions section of the draft Section 5.4 in the subbasin GSPs is focused primarily on nitrate. The GSPs identify numerous constituents that have been detected in groundwater above drinking water standards, but, with the exception of nitrate, do not present this data spatially. Even though the subbasin GSPs set water quality minimum thresholds for additional constituents (See Tables 8-4 and 8-5), the supporting data is not all presented, and limited analyses of spatial or temporal water quality trends are presented. This does not present a clear and transparent assessment of current water quality conditions in the subbasin with respect to drinking water beneficial use (23 CCR § 354.16(d)).
    - We reiterate the request made in previous comment letters and acknowledge the inclusion of Appendix 5-B, Figure 1: Water Quality Exceedances for DDW Wells which shows DDW wells that have had a COC exceedance between 1986-2019. This new appendix has significant limitations. For example, San Jerardo Cooperative's well is

[29] The maximum contaminant level for hexavalent chromium should be reinstated in 2021. Data is available from the State Water Resources Control Board and Monterey County Environmental Health Bureau (public water system data, state/local small water system data) as well as on GAMA from the Central Coast Regional Water Quality Control Board's private well testing program.

shown to have multiple exceedances of COCs during the time period shown (between 1986-2019). Yet, the well that had these exceedances is no longer active. Instead, San Jerardo's new well is showing increased trends of nitrate and arsenic. CWC's Figures in this comment letter illustrate the importance of presenting trend data for San Jerardo Cooperative's well and others throughout the Salinas Valley Basin. It is also important to include COC data for wells that are not yet in violation of drinking water standards. In addition, *CWC Figure 6: Arsenic Concentrations in Public Water System Wells, Monterey, Langley East Side Subbasins (Red dots = >10 ppb, Orange = 5-9.9 ppb, Yellow = 0.6-5.9 ppb, Green= non-detect)* illustrates hot spots for arsenic and also areas in orange (5-9.9 ppb arsenic), like San Jerardo, that are at risk if business-as-usual groundwater management continues.

- **Augment and clarify data presented in Table 5-3 GAMA Water Quality Data Summary and Section 5.4.1 in the following ways:**
  - **Add all state and local small water systems data.** Table 5-3 should include all state and local small water system data for nitrate, arsenic, hexavalent chromium, and any other contaminants that Monterey County monitors in the subbasin.
  - **Include additional contaminants that have been detected in the subbasin(s) to be consistent with Tables 8-5 and 8-6.** Our review of publicly available data on drinking water wells of all types (private domestic wells, state/local small water systems, and public water systems) indicate that there are additional constituents of concern beyond those currently listed. We included CWC Figure 6 (page 9) to highlight the spatial distribution of arsenic in public water system wells in the **East Side, Langley and Monterey Subbasins**, and CWC Figure 7 (page 10) to highlight the spatial distribution of hexavalent chromium in public water system wells in the **Langley Subbasin**. We recommend a more comprehensive analysis of all other constituents in the subbasins, including, but not limited to the following[30]:
    - **East Side Subbasin:** Table 5-3 presents data on two primary contaminants in drinking water: nitrate and 123-trichloropropane, but arsenic is also of particular concern to San Jerardo Cooperative and others in the subbasin. GAMA shows that four public water system wells have exceedances of the arsenic MCL in the past three years (CWC Figure 8), and state/local small water system out of compliance lists from the Monterey County Health Department (2021) show that both Old Stage Rd WS #6 and Old Stage Rd WS #7 are out of compliance for arsenic and that at least five other state or local small water systems have between 6-8 ppb of arsenic, which means they are similar to San Jerardo

[30] All Monterey County data shared in this section was collected by the small water system program.
https://www.co.monterey.ca.us/government/departments-a-h/health/environmental-health/drinking-water-protection/state-and-local
It was downloaded from the Greater Monterey County Community Water Tool on April 22, 2021:
http://www.greatermontereyirwmp.org/documents/disadvantaged-community-plan-for-drinking-water-and-wastewater/

Cooperative in terms of their vulnerability to water level fluctuations or other changes.

  - **Forebay Subbasin:** While arsenic is less common in the Forebay than in the Langley, Monterey, and East Side Subbasins, our review of the Monterey County Health Department data indicates that 17 state or local smalls had arsenic at levels above 1 ppb in the 2015-2017 time period, and at least two of these had levels above the MCL. See CWC Figure 5 (page 8) which illustrates trends in one of the out-of-compliance small water systems, Metz Road Water System #4. In addition, three systems monitored by Monterey County as part of their Local Primacy Program for public water systems serving 15-199 connections had hexavalent chromium detections of 2.8 ppb, 3.4 ppb, and 2.1 ppb in the 2014-2017 timeframe.
  - **Upper Valley Subbasin:** Although arsenic is not as common in the Upper Valley as other subbasins, it has been detected in levels between 3.2 and 5 ppb in six small water systems monitored by Monterey County.

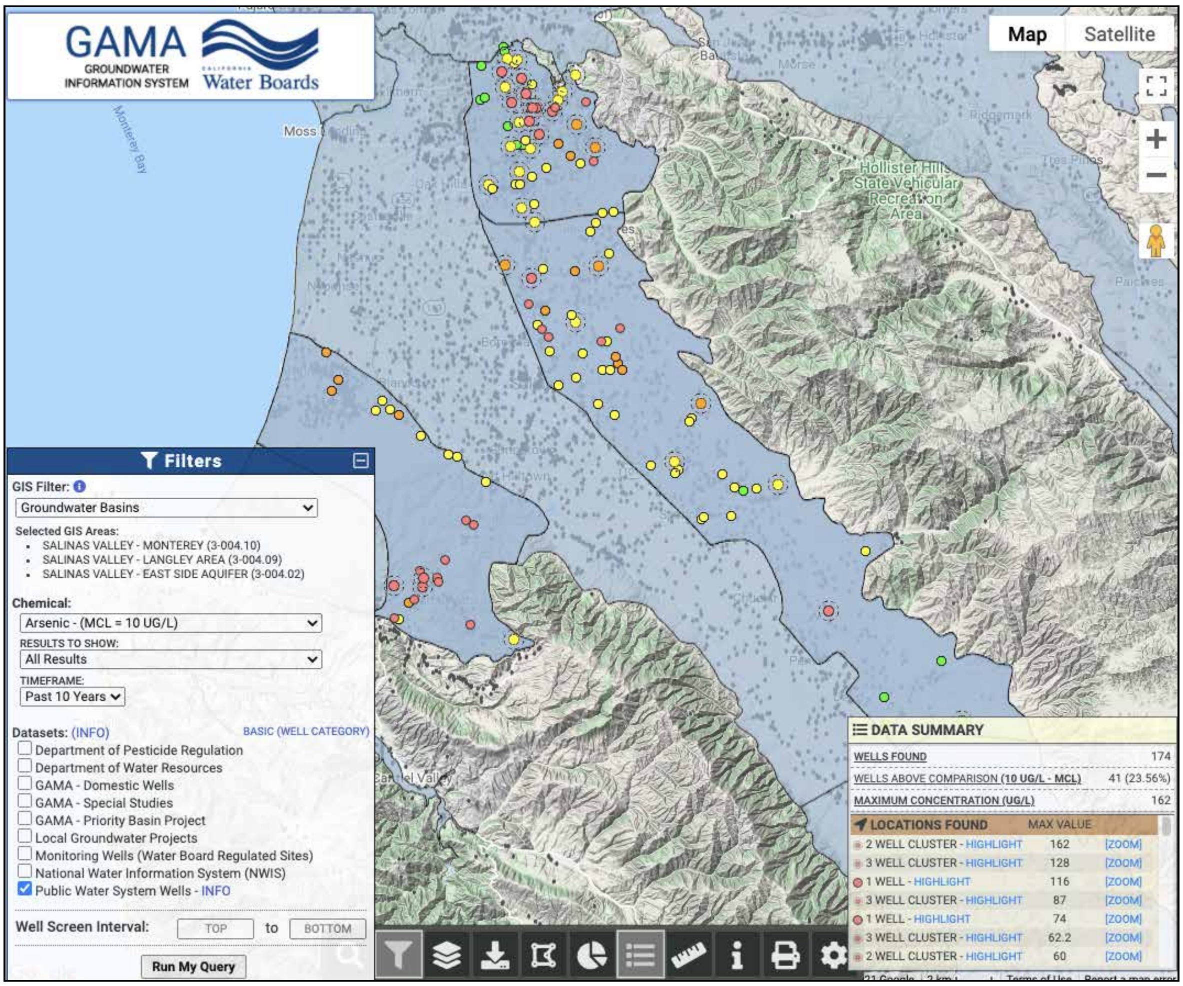
- SVB GSA Response: "The water quality analysis was redone for V2 to include both current and historic groundwater quality data, and arsenic is now a constituent of concern in the Eastside Subbasin. Section 5.4.3 and 5.4.4 text was also revised to provide more specificity about the constituents and wells sampled."
  - Our Response: We acknowledge that the SVB GSA added arsenic as a constituent of concern in the Eastside Subbasin GSP. We reiterate these comments to ensure that all subbasin GSPs include all contaminants detected in the subbasins as COCs. It is important to include all contaminants detected in the subbasins as COCs and not only those greater than the MCLs because many contaminants, such as arsenic and hexavalent chromium, pose a risk to public health at levels much lower than the MCL. The Office of Environmental Health Hazard Assessment (OEHHA) sets a public health goal (PHG) for each chemical. PHGs are levels of a contaminant in drinking water that do not pose a significant risk to health. The public health goal for Arsenic is 0.004 ppb and hexavalent chromium is 0.02 ppb.[31]
  - SVB GSA Staff replied: “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 occured in the latest sample, while Table 8-6 includes

[31] https://oehha.ca.gov/water/public-health-goals-phgs

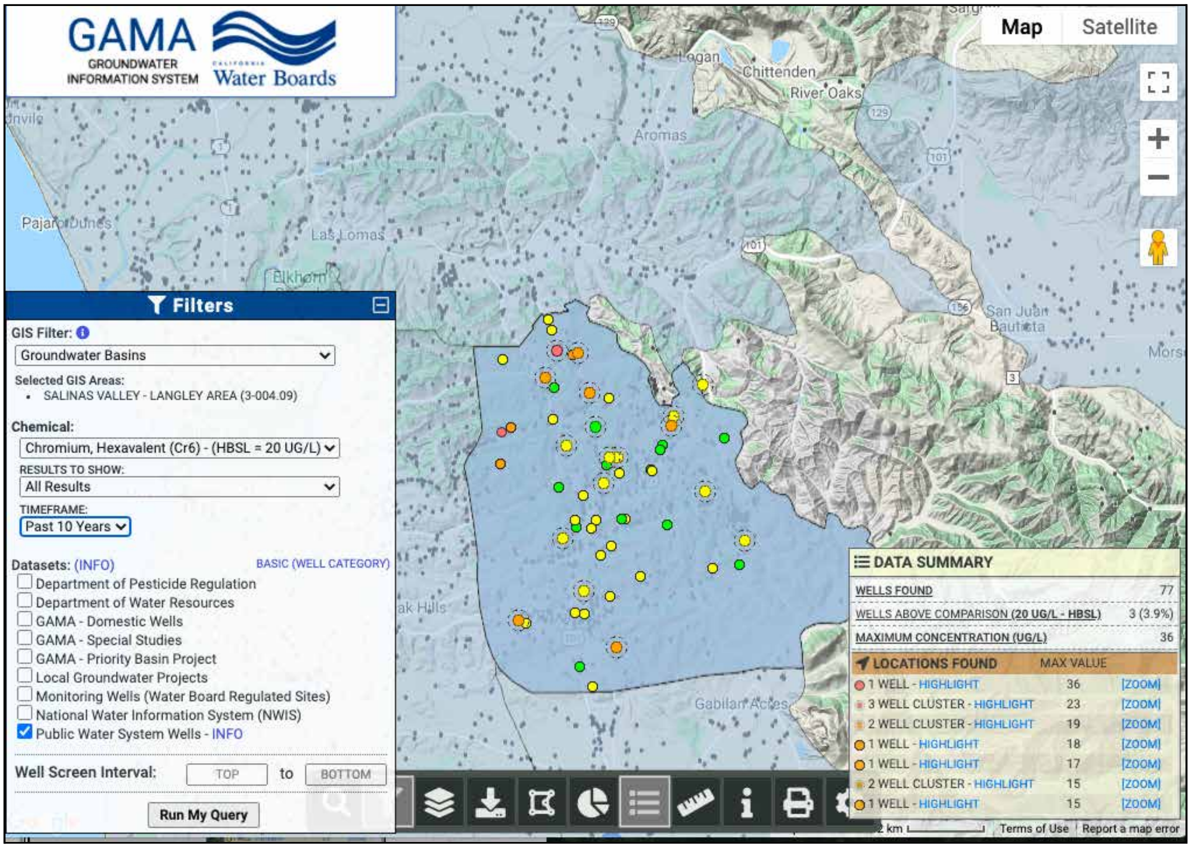
all the constituents that were included in the analysis that have been sampled for historically in each set of wells."

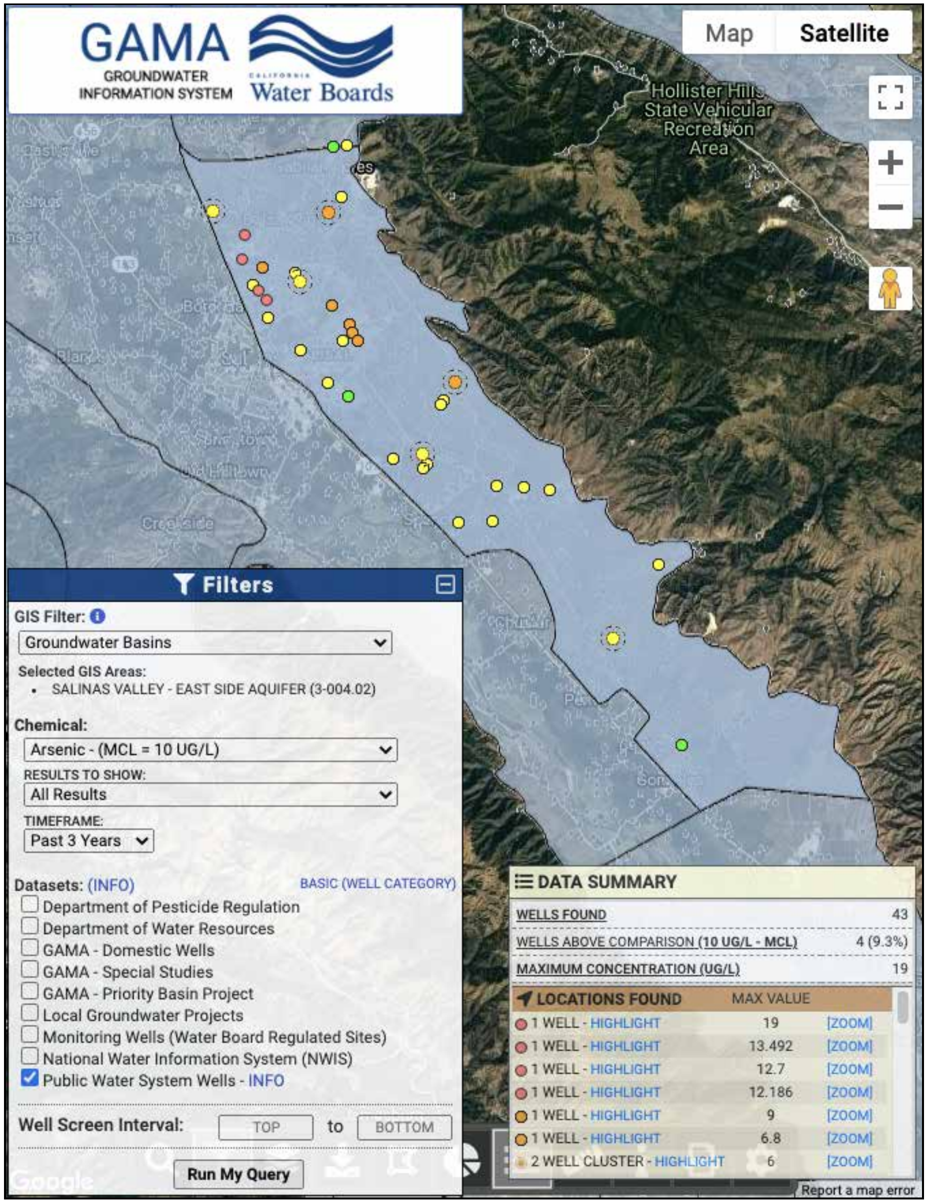
- Our response: We acknowledge the updates to Table 5-3 and request clarity on whether the DDW wells are all public water system wells, as defined in Section 7.5, or whether wells of other types are also included. Also, please add text explaining why two different time periods of data used in this table for DDW and ILRP wells. This table includes DDW wells sampled for COCs between December 1982 to December 2019, and ILRP Wells sampled from May 2013-December 2019.

CWC Figure 6: Arsenic Concentrations in Public Water System Wells, Monterey, Langley East Side Subbasins (Red dots = >10 ppb, Orange = 5-9.9 ppb, Yellow = 0.6-5.9 ppb, Green= non-detect)

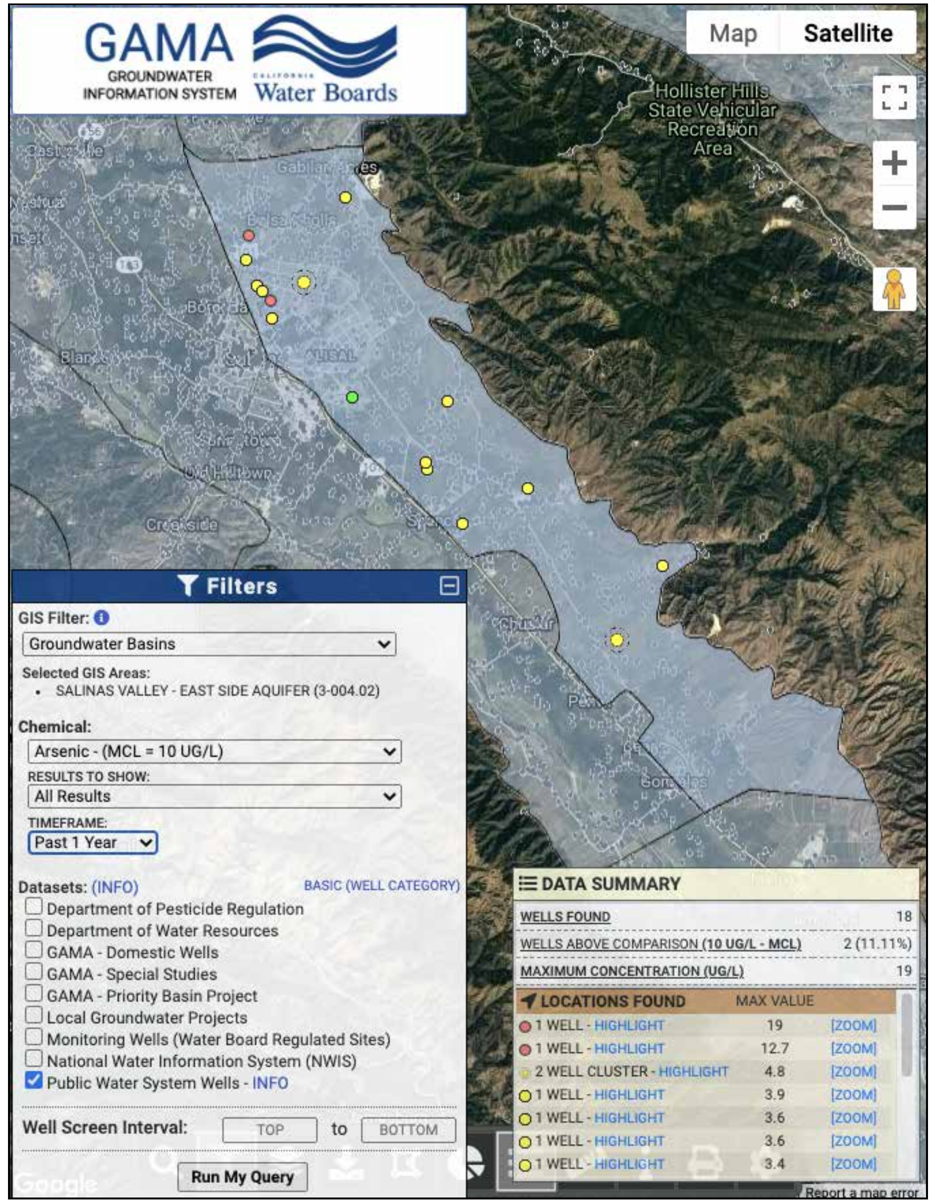


CWC FIgure 7: Hexavalent Chromium Concentrations in Public Water System Wells, Langley Subbasin





CWC Figure 8: 43 Public Water System Wells have arsenic data in the past 3 years. One well at San Jerardo Cooperative appears orange on this map.



CWC Figure 9: Only 18 Public Water Systems Wells have arsenic data in the past year. San Jerardo Cooperative's wells are not shown on this map.

GSP Chapter 6: Water Budgets

SGMA requires a GSP to quantify the water budget in sufficient detail in order to build local understanding of how historic changes have affected the six sustainability indicators in the basin.[32] Ultimately, this information is intended to be used to predict how these same variables may affect or guide future management actions.[33] GSAs must provide adequate water budget information to demonstrate that the GSP adheres to all SGMA and GSP regulation requirements, that the GSA will be able to achieve the sustainability goal within 20 years, and be able to maintain sustainability over the 50 year planning and implementation horizon.[34]

The calculations of sustainable yield and the water budget in this chapter may *overestimate the actual sustainable yield and water availability of the subbasins*. We highlight points of concern below and recommended changes.

6.4 Projected Water Budgets

The SVB GSA Subbasin GSPs explain that "[p]rojected water budgets are extracted from the SVOM, which simulates future hydrologic conditions with assumed climate change. Two projected water budgets are presented, one incorporating estimated 2030 climate change projections and one incorporating estimated 2070 climate change projections. … The climate change projections are based on data provided by DWR (2018)."[35] Including climate change scenarios in water planning is an important step for California's increased resiliency. However, which scenarios to include is a critical question.

Climate change is affecting when, where, and how the state receives precipitation.[36] Impacts to water supply, particularly drinking water supply, could be devastating if planning is inadequate or too optimistic. GSAs must adequately incorporate climate change scenarios in water budgets. As such, the DWR Climate Change Guidance[37] makes recommendations to GSAs for how to conduct their climate change analysis while preparing water budgets. DWR also provides climate data for a 2030 Central Tendency scenario and 2070 Central Tendency, 2070 Dry-Extreme Warming (DEW), and 2070 Wet-Moderate Warming (WMW) scenarios. While DWR's Guidance should be improved with more specific guidelines and requirements, the current Guidance specifically encourages GSAs to analyze the more extreme DEW and WMW projections for 2070 to plan for likely events that may have costly outcomes. Therefore, we recommend that the SVB GSA subbasin GSPs:

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[32] 23 CCR § 354.18.
[33] California Department of Water Resources (DWR), 2016. Best Management Practices for the Sustainable Management of Groundwater, Modeling (BMP #5), December 2016.
[34] 23 CCR § 354.24.
[35] California Department of Water Resources (DWR), 2018. Guidance for Climate Change Data Use During Groundwater Sustainability Plan Development. https://data.cnra.ca.gov/dataset/sgma-climate-change-resources/resource/f824eb68-1751-4f37-9a15-d9edbc854e1f?inner_span=True.
[36] Union of Concerned Scientists. Troubled Waters: Preparing for Climate Threats to California's Water System, 2020. https://www.ucsusa.org/resources/troubled-waters#top.
[37] See DWR (2018) reference above.

- **Include water budget analyses based on DWR's 2070 DEW and WMW scenarios in order to analyze the full range of likely scenarios[38] that the region faces.**
    - Currently, the SVB GSA's exclusive use of the "central tendency" climate scenario predicts an increase in surface water availability, as represented in the tables in Section 6.4.3 of the subbasin GSPs. The Projected Groundwater Budgets show increases in deep percolation of stream flow, deep percolation of precipitation, and irrigation. The subbasin GSPs are relying on this presumed increase for their water budgets. However, the 2070 DEW scenario provided by DWR could likely result in a significant decrease in precipitation and increase in evapotranspiration, which would have substantial effects on the subbasin water budgets. By analyzing only the central tendency scenario and not other likely scenarios such as the extremely dry and wet scenarios provided by DWR, the SVB GSA is ignoring the specific 2070 DEW and WMW scenarios provided by DWR as well as an increasing trend in drought frequency. In doing so, the GSP could be overestimating groundwater recharge or underestimating water demands, inadequately planning, and jeopardizing groundwater sustainability. This will waste precious time to prepare and reduce the vulnerability of the basin's agriculture and already vulnerable communities.
    - DWR's guidance (2018) states that the central tendency scenarios *might* be considered most likely future conditions -- that is not a clear endorsement of a higher statistical probability. It appears that they are calling it the central tendency merely because it falls in the middle of the other two projections, not because it is significantly more probable.
    - DWR (2018) explicitly encourages GSAs to plan for more stressful future conditions:
        - "GSAs should understand the uncertainty involved in projecting future conditions. The recommended 2030 and 2070 central tendency scenarios describe what might be considered most likely future conditions; there is an approximately equal likelihood that actual future conditions will be more stressful or less stressful than those described by the recommended scenarios. Therefore, GSAs are encouraged to plan for future conditions that are more stressful than those evaluated in the recommended scenarios by analyzing the 2070 DEW and 2070 WMW scenarios.."[39]

[38] Terminology used in the California Climate Change Assessment, 2019. (Table 3). https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf.

[39] California Department of Water Resources (DWR), 2018. Guidance for Climate Change Data Use During Groundwater Sustainability Plan Development. Section 4.7.1. https://data.cnra.ca.gov/dataset/sgma-climate-change-resources/resource/f824eb68-1751-4f37-9a15-d9edbc854e1f?inner_span=True. (In red is a statement about the central tendency scenarios referenced in SVB GSA public meetings and email communications by the GSA's engineering consultant, and in blue is the important text accompanying it, urging GSAs to analyze the more extreme scenarios. CWC staff cited this complete paragraph in email communications with the consultant and GSA staff on April 8, 2021. CWC also raised this point at Forebay and Upper Valley Subbasin Committee meetings in March and at the April SVB GSA Board Meeting.)

- Including the DEW and WMW climate scenarios as part of the 2070 water budget analysis is necessary to meet the statutory requirement to use the "best available information and best available science."[40] Sustainable planning must include planning for foreseeable negative and challenging scenarios. The extreme scenarios provided by DWR are certainly foreseeable, as they have been modeled and made available to the GSA for analysis.
- It is important for the SVB GSA to include the 2070 DEW and WMW scenarios, because shallow drinking water wells in the area are particularly vulnerable to various extreme conditions, especially drought.

- **Share water budget results based on the 2070 central tendency, DEW and WMW scenarios that DWR has provided with the Subbasin committees, the Advisory Committee, and the GSA board**. This should be done at a *minimum* to see what the difference in outcomes could be, and to provide a transparent process for selecting the preferred scenario. This analysis is particularly important because of the drastic differences between the dry and wet scenarios for this region. Drought and/or intensified rainfall (more water falling over a shorter period of time) would pose severe challenges[41] to the Subbasins' plans for recharge, which is a critical component of their plans to reach sustainability.
- **Plan for potential adverse climate conditions when determining Projects and Management Actions.** The results of limited-scope planning will be detrimental to beneficial users throughout the SVB GSA. "If water planning continues to fail to account for the full range of likely climate impacts, California risks wasted water investments, unmet sustainability goals, and increased water supply shortfalls."[42] This is true not just generally across California, but also specifically on the Central Coast. "Without effective adaptations, projected future extreme droughts will challenge the management of the Central Coast region's already stressed water supplies, including existing local surface storage and groundwater recharge as well as imported surface water supplies from the State Water Project which will become less reliable, and more expensive."[43]

GSP Chapter 7: Monitoring Network

Robust monitoring networks are critical to ensuring that the GSP is on track to meet sustainability goals. GSAs undertaking recharge, significant changes in pumping volume or location, conjunctive management or other forms of active management as part of GSP implementation must consider the interests of all

[40] See 23 CCR § 355.4(b)(1).

[41] Union of Concerned Scientists. Inter-model agreement on projected shifts in California hydroclimate characteristics critical to water management. 2020, p. 13. https://link.springer.com/content/pdf/10.1007/s10584-020-02882-4.pdf.

[42] See Union of Concerned Scientists. Troubled Waters (2020) cited above.

[43] Regional Climate Change Assessment for the Central Coast, 2019. (Discussing drought pp. 21-23. Internal citations omitted). https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-006_CentralCoast_ADA.pdf.

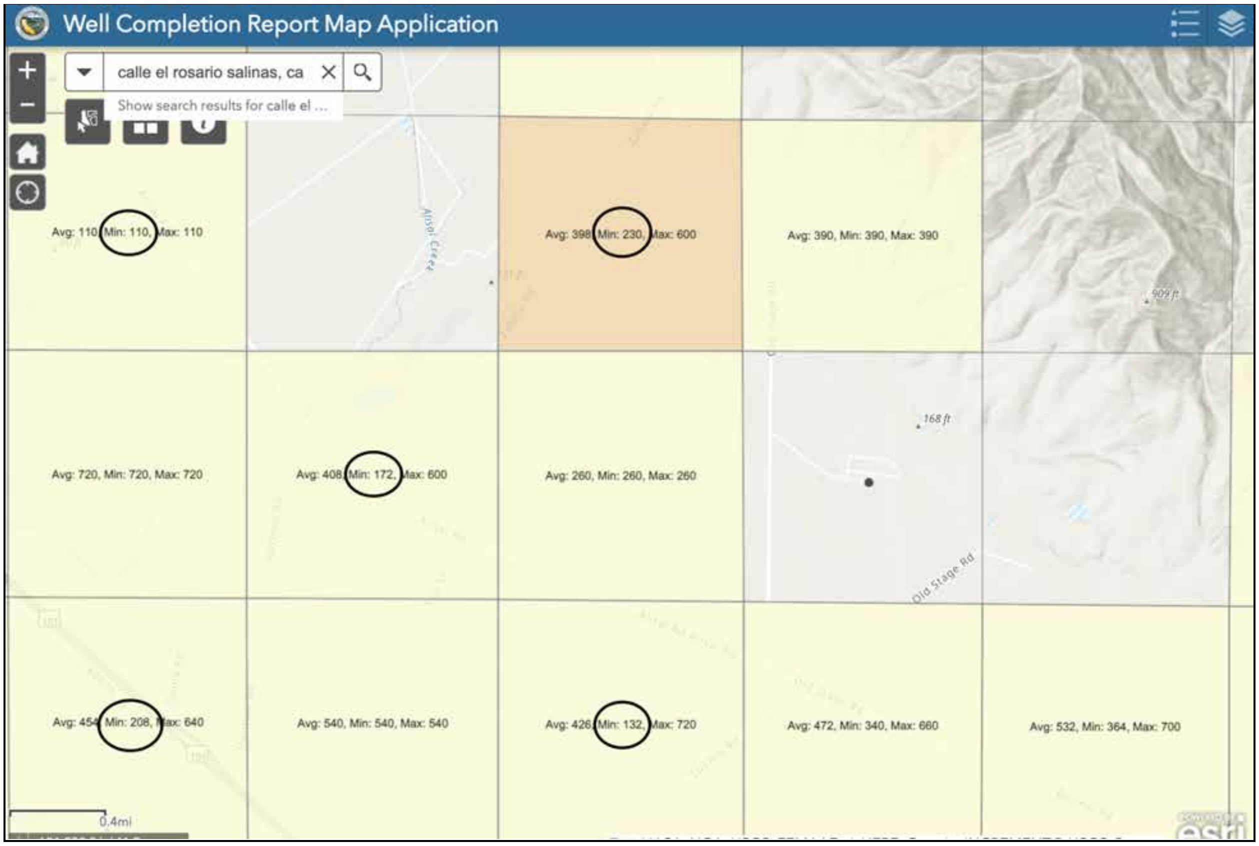
beneficial users, including domestic well owners and S/DACs. We have the following overarching recommendations for this chapter and provide more details for sub-sections below:

- **Require well registration and metering for all wells in the Salinas Valley, and begin implementation of a well registration and metering program in early 2022 with a dedicated budget.** We voice our strong support, with modifications indicated in our comments below, for proposed "Implementation Action 12: Well Registration" in Section 9.1 of Chapter 9 released in April 2021 and recommend that this action be updated and moved to Chapter 7. We agree with the SVB GSA's statement in Section 7.3.2 Groundwater Storage Monitoring Data Gaps that: "Accurate assessment of the amount of pumping requires an accurate count of the number of municipal, agricultural, and domestic wells in the GSP area. During implementation, the SVB GSA will finalize a database of existing and active groundwater wells in the Eastside Aquifer Subbasin." This is essential for the plan to achieve sustainability for all beneficial users and influences many different chapters including:
    - Monitoring networks: In order to develop a monitoring network that is representative, it will be essential to understand the number, location, well construction, and type (domestic, irrigation, other) of all wells located in the subbasins.
    - Water budget and minimum thresholds: Understanding the amount and location of pumping of all water users will be essential for creating an accurate water budget and minimum thresholds consistent with achieving sustainability.
    - Projects and management actions: Section 9.2.1 Well Registration and Metering is a key management action and component of the Water Charges Framework (in the 180/400 foot aquifer) and forthcoming subbasin GSPs. This will underpin the funding structure for many future projects.
- **Require flowmeter calibration to ensure consistent and fair monitoring among all agricultural groundwater users (Section 7.3.1).** Rather than "consider the value of developing protocols for flowmeter calibration," the GSPs should require flowmeter calibration. The water budget and sustainable yield calculation depend on reliable and fair monitoring and reporting of pumping.
- **Provide a plan and schedule for data gap resolution in Chapter 10 of the subbasin GSPs.** In the 180/400 foot aquifer GSP, there was not a clear plan or schedule for the resolution of data gaps in Chapter 7 even though it indicated that this would be included in Chapter 10.
- **Revise GSP monitoring chapters such that monitoring networks for groundwater storage (pumping), groundwater elevation, and groundwater quality adequately monitor how groundwater management actions could impact vulnerable communities including those reliant on domestic wells and shallow portions of the aquifers** (see more detail below).

7.2 Groundwater Elevation Monitoring Network

- **Include groundwater elevation monitoring sites in the network that are representative in terms of the depth and geographic distribution of private domestic wells, and that take into account areas of high agricultural pumping and wells vulnerable to groundwater decline.**
  - The draft East Side Subbasin GSP Table 7-1 of "Eastside Aquifer Groundwater Elevation Representative Monitoring Site Network" shows all irrigation and observation wells (and no domestic wells) which range in depth from 299 to 1122 feet.[44] Yet, the DWR Well Completion Report Map Application[45] shows that 1 mile by 1 mile square sections near San Jerardo Cooperative include private domestic wells with the following minimum depths: 110 ft, 210 ft, 172 ft, 208 ft, and 132 ft which are more shallow than all the wells in the current monitoring network (See CWC Figure 10).
- **Overlay the private well density map (Figure 3-7), the DWR Well Completion Report Map Application (with minimum, average, and maximum depths), the water level monitoring network (with well depths), and available pumping data to better illustrate if and how representative the proposed groundwater elevation monitoring network is of private domestic wells and which areas are vulnerable to water elevation changes.** The GSPs state: "The BMP notes that professional judgment should be used to design the monitoring network to account for high-pumping areas, proposed projects, and other subbasin-specific factors." This will also help to better visualize where there are gaps in the monitoring network which the GSAs can address.

[44] One well shows "0" depth but that must be an error or missing value.
[45] https://water.ca.gov/Programs/Groundwater-Management/Wells/Well-Completion-Reports



CWC Figure 10: Screenshot of DWR Well Completion Report Map application in the area near San Jerardo Cooperative highlighting that several 1 mi. by 1 mi. square sections include private domestic wells less than 250 feet deep.

7.5 Water Quality Monitoring Network

- **Clarify the number of public water system wells that will be included in the water quality monitoring network.** As indicated in Chapter 3 and Chapter 5 comments, the GSPs should also clearly identify the total number of public supply wells as well as the number of public supply wells that are out of compliance and at risk in each subbasin. Section 7.5 currently states that "Ninety DDW wells have been chosen to be part of the RMS network. These wells are shown on Figure 7-4 and listed in Appendix 7D." This section and appendix should be consistent with the total number of wells represented in Table 8-4 which includes groundwater quality minimum thresholds. As previously noted, we also recommend clearly presenting the number of public water system wells and state and local small water system wells located in each subbasin. A review of Appendix 7D indicates that perhaps not all wells listed are public water system wells.
- **Representative Water Quality Monitoring Wells for the shallow aquifer should be established in the GSPs based on all currently available data sources with direct agreements with landowners or public entities established.**

- **Develop long-term access agreements for Representative Monitoring Wells (RMWs) that use private wells.** It is currently difficult to reliably collect data from private wells due to access challenges, lack of well construction information, and unreliable accounting of pumping or non-pumping measurements. The GSPs should specifically identify the RMW owners and operators, include signed long-term access agreements, and identify a plan to obtain adequate monitoring data, if for any reason the well owners decide to not grant access to the wells or provide associated data to the SVB GSA. In order to maintain consistency for future sustainability analyses, the SVB GSA should also consider conducting its own water quality analysis of wells where access agreements have already been established to water quality RMWs.
- **Clarify that state and local small water systems will be added to the water quality monitoring network and that well construction information is no longer needed in order to fill this data gap.** Monterey County Environmental Health Bureau permits and monitors over 900 state and local small water systems in the County and have managed the data collected for decades. This dataset has advantages over the ILRP domestic well dataset in that it includes data on contaminants like arsenic and hexavalent chromium in addition to nitrate. Local small water systems serve 2-4 households and are much more similar to private domestic wells than public water systems in terms of depth, well construction, age, size, and maintenance - thus this data would provide a broader representation of shallow drinking water wells. State and local small water systems are located in areas of irrigated agricultural lands as well as rural residential and other land uses. This dataset should complement and not replace ILRP domestic well data.
  - **Clearly add state and local small water system data as a data gap in Section 7.5.2.** In Section 7.5 Water Quality Monitoring Network, the draft GSPs state: “These [state and local small] wells are not in the current monitoring system because well location coordinates and construction information are currently missing. SVB GSA will work with the County to fill this data gap. When location and well construction data become available, these wells will be added to the monitoring network and included in Appendix 7E and Figure 7-4." However Section 7.5.2 Groundwater Quality Monitoring Data Gaps states: "There is adequate spatial coverage to assess impacts to beneficial uses and users."
- SVB response: 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.

- Our response: We reaffirm our previous comments, requests, and arguments in support of including the SSWS and LSWS data. We would also like additional clarity on what the barriers are to including this important dataset and to explore how they can be resolved. SVB GSA has successfully incorporated the GIS data for the SSWS/LSWS boundaries into its dataviewer and now also into Chapter 3's recent updates. The water quality data was also included in the 180/400 foot aquifer GSP in Chapter 8 in a table indicating exceedances of nitrate and arsenic. CWC, San Jerardo Cooperative and the Greater Monterey County Regional WAter Management Group have also utilized this data successfully in past projects. The value of the full dataset, particularly that it more accurately represents domestic well conditions than any of the other current components of the water quality monitoring network, should outweigh any administrative burden to transfer the data.
- **Do not rely solely on ILRP well data to represent private domestic wells (which are often more shallow than public water system wells).** Similar to CASGEM, the current groundwater quality monitoring network includes monitoring points on private property including ILRP domestic and irrigation wells, but it should not be restricted to ILRP sites only. While on-farm domestic and irrigation wells monitored through the ILRP provide a potentially useful, though limited, source of water quality information, additional representative monitoring wells in the shallow aquifer are important to include for several reasons: (1) The ILRP network only includes wells located on agricultural irrigated lands, and not all ILRP properties include domestic wells. Agricultural land use is not the primary land use in the Langley and Monterey Subbasins so this monitoring network offers very limited coverage. While agricultural land use is the primary land use in the East Side, Upper Valley, and Forebay Subbasins, there are private domestic wells in areas with different primary land uses (e.g. rural), and SGMA requires that monitoring networks are geographically representative. Monitoring network wells must also be sufficiently representative to cover all uses and users in the basin, (2) There are other, more robust networks established by USGS, GAMA, and Monterey County that could be drawn on and included to make the groundwater quality monitoring network more comprehensive and representative of conditions in the shallow aquifer, (3) Ag Order 4.0 was adopted on April 15, 2021, which means the first year of monitoring data will not be available until late 2022, (4) The GSA has no authority to determine the robustness or enforcement of monitoring in the irrigated lands network, and (5) while Ag Order 4.0 proposes to require testing for 1,2,3-TCP as well as nitrate, the current ILRP domestic well data only samples for nitrate, and neither Order tests for other contaminants found in the region. In our experience, not all growers are consistent with their water quality and other reporting, despite the regulatory requirements in place.

- SVB GSA response: "Section 7.5 text was revised to specify that the groundwater quality monitoring network is dependent on the existing samping and well density of the ILRP and DDW monitoring programs. Chapter 5 and 8 text include the constituents of concern that will be monitored in each type of well. SGMA Regulations only require "spatial and temporal coverage." Furthermore, the vertical coverage of the monitoring system cannot be further determined because ILRP well data do not include well depths or screen intervals, which would make it difficult to map vertical water quality."

- Our response: SGMA Regulations instruct GSAs to "[c]ollect sufficient spatial and temporal data from each applicable principal aquifer to determine groundwater quality trends for water quality indicators, as determined by the Agency, to address known water quality issues."[46] Sufficient "spatial" data would include appropriate well depths in order to adequately capture potential groundwater quality trends, particularly those that would affect domestic well owners and DACs.

GSP Chapter 8: Sustainable Management Criteria

SGMA requires a GSA to define existing conditions within the basin and characterize undesirable results, including minimum thresholds and measurable objectives to determine a sustainability goal as sustainable management criteria.[47] We have grouped our comments in this section into general recommendations related to all sustainable management criteria (SMCs) followed by a section specific to the water quality SMCs.

General Recommendations

- **Undertake a drinking water well impact analysis that adequately quantifies and captures well impacts at the minimum thresholds, proposed undesirable results, and potential interim conditions.** Include this analysis during the annual reporting process. We disagree with the assumption included in all draft GSPs that the exact location of wells needs to be known in order to include them in a drinking water well impact analysis. In the 180/400 Foot Aquifer Subbasin GSP, the SVB GSA included a domestic well impact analysis. Although the SVB GSA did not describe the methods used in this analysis,[48] it is CWC's understanding that the analysis was based on Public Land Survey System (PLSS) section location data, demonstrating that such an analysis is feasible. Similar analyses in the Water Foundation Whitepaper (June 2020)[49] and in the Kings River East GSP[50] were completed using the same PLSS section location data for private domestic wells that is available to the SVB GSA. The current analysis is incomplete as it includes

[46] 23 CCR § 354.34(c)(4).
[47] 23 CCR §§ 354.22-354.30.
[48] Community Water Center and San Jerardo Cooperative, Inc. Comments on the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan. May 15, 2020.
https://sgma.water.ca.gov/portal/service/gspdocument/download/4012
[49] The Water Foundation Whitepaper, April 2020: "Estimated Numbers of Californians Reliant on Domestic Wells Impacted as a Result of the Sustainability Criteria Defined in Selected San Joaquin Valley Groundwater Sustainability Plans and Associated Costs to Mitigate Those Impacts." April 9, 2020.
http://waterfdn.org/wp-content/uploads/2020/05/Domestic-Well-Impacts_White-Paper_2020-04-09.pdf
[50] Kings River East Groundwater Sustainability Agency. Groundwater Sustainability Plan. Adopted December 13, 2019.

very few wells in all subbasins. The current analysis is also substantially inaccurate as it relies on the "average computed depth of domestic wells in the Subbasin," and groundwater elevations vary significantly across the subbasin and also on an annual basis. For example, only 8 of the 154 domestic wells in the Forebay GSP with an average depth of 292.45 feet, and only 20 of 2016 domestic wells in the East Side GSP with an average depth of 365.5 feet were included. CWC Figure 10 illustrates that the average computive depth is not representative of conditions in shallow domestic wells. Therefore, we recommend revising Section 8.6.2.2 Minimum Threshold Impact on Domestic wells following the process explained below:

- **Include a map of potentially impacted wells so the public can better assess well impacts specific to DACs, small water systems, or other beneficial users of water.**
- **Quantify impacts for all drinking water wells in the subbasin for which approximate location (PLSS section) and well depth are available.** Similar analyses based on the PLSS section location of private domestic wells have been completed by Water Foundation (June 2020)[51] and in the Kings River East GSP[52].
- **Account for well screen and pump depth when available.** When not available, well screen and pump depth should be estimated conservatively to capture potential impacts to well operability under water scarcity conditions.
- **Quantify impacts for potential unfavorable interim conditions, such as droughts and short-term lowering of groundwater levels while implementation measures are put in effect.**
- **Quantify the elevation difference (in feet) between current groundwater levels and well bottoms, screens, and pumps.** If current groundwater levels are nearing well bottoms, screens or pumps, that indicates that the wells are vulnerable to interim lowering of groundwater levels.
- **Quantify the elevation difference (in feet) between the minimum threshold groundwater levels and well bottoms, screens, and pumps.** If the minimum threshold is near the well bottom, screen or pump, that well will be impacted if groundwater levels in the vicinity drop below the minimum threshold (even if minimum thresholds are met at 90 percent of monitoring wells and an undesirable result has not technically occurred).
- **Quantify the number of potentially impacted wells of each well type (irrigation, domestic, state/local small water system, public water system) for water quality, water levels, and sea water intrusion MTs.**
- **Quantify the costs associated with impacted wells including desalinization/treatment, lowering pumps, well replacement and increased pumping costs associated with the increased lift at the projected water levels.**

[51] *Id.*
[52] *Id.*

- SVB GSA's response: 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.
- Our response: We reiterate that including the centroid of the section is a reasonable and feasible way of conducting this analysis and has been used by other GSAs and researchers. As noted, we believe that SVB GSA itself used PLSS data to conduct the well impact analysis for the 1800/400 Foot Aquifer GSP. Including such a disproportionately low number of wells in the studies is likely to produce unrepresentative results.

Groundwater Quality

We are pleased that the Salinas Valley Subbasin GSPs establish minimum thresholds based on maximum contaminant levels (MCLs) for contaminants of concern for drinking water supply systems. However, there are other areas in regards to groundwater quality sustainable management criteria that are not clear and could cause significant impacts to drinking water users if not adequately addressed. Therefore, we recommend the following revisions:

- **Add state and local small water systems to the monitoring network with the same water quality minimum thresholds and measurable objectives for reasons stated in Chapter 7 comments.** A table for state and local small water system minimum thresholds was included in the 180/400 foot aquifer GSP, but in the draft subbasin GSPs, there is no such table and Table 8-1 only mentions public supply and on-farm domestic wells.
- **If a contaminant was already above the MCL as of January 1, 2015, subbasin GSPs should set a MT to prevent further degradation or aim to improve groundwater quality conditions where possible.** Increased contamination levels can require water systems to utilize more expensive treatment methods and/or to purchase additional alternative supplies as blending may become more difficult or impossible. Communities reliant on domestic wells who are aware of contamination in their water and use point-of-use/point-of-entry (POU/POE) treatment systems may no longer be able to use their devices if contaminate levels rise too high. Higher contaminant levels can also result in higher costs of waste disposal from certain types of treatment systems. Further, residents who rely upon domestic wells, state small water systems, or local small water systems may not even know what contaminants are in their water and at what levels. Users of these drinking water sources are not required to conduct testing, and many times do not have the resources necessary to conduct regular testing. Rising contaminant levels put these users and their health at serious risk. Increased contamination levels result in unreasonable impacts to access to safe and affordable water and are, thus, inconsistent with SGMA and the Human Right to Water. This recommendation is consistent with the State Water Board's recommendations regarding this topic in their letter to DWR regarding the 180/400 foot aquifer GSP in which they state: "Increasing concentrations of nitrate, arsenic, and other constituents at monitoring wells with existing exceedances may represent worsening of existing

conditions due to groundwater pumping. Staff recommend setting concentration threshold levels for these wells in order to determine if impacts due to pumping are occurring."[53]

  - **Develop management areas to protect areas where drinking water wells have water quality that are vulnerable, including the San Jerardo area.**

- **For monitoring network wells with contamination less than 75% of the MCL for all contaminants, the GSPs should set MOs at 75% of the MCLs.** Subbasin GSPs should include MOs as action triggers at 75% of MCL for each constituent of concern so that groundwater can be managed in that area to prevent a minimum threshold exceedance at a representative monitoring well. This buffer is particularly critical with contaminants like nitrate that can cause acute health effects. If the GSA waits until the minimum threshold is exceeded, it may be too late or difficult for actions to be effective. Actions to prevent minimum threshold exceedances should also be clearly explained in this Chapter including a description of what action will be taken, what type of evaluation will be used, under what time period action will take place, and how this action will be funded. We also recommend that groundwater quality and trigger levels at 75% are added to the Water Quality Partnership plans and/or a Well Impact Mitigation Program
  - SVB GSA response: The GSA is not responsible for improving water quality and 75% of MCLs would require remediation.
  - Our response: To clarify, our recommendation is, where water quality is currently below 75% of MCLs, to maintain levels below that mark instead of allowing them to progress up to the MCL. The objective should not be to allow water quality to degrade up to just below the MCL. Many contaminants, such as 123-TCP and arsenic, have public health goals far below the MCL. The MCL is not an established safe level, but rather is a legal limit that also takes into account the economic and technical feasibility of compliance for public water systems. For those contaminants, increasing from 50% to 75% of the MCL represents an increase in health risk.
- **Clearly identify and describe past and present levels of contamination and salinity at each representative monitoring well (RMW) and attribute specific numeric values for MTs/MOs at each RMW for each contaminant of concern.** Quantitative values need to be established for MTs/MOs for each applicable sustainability indicator at each RMW as required by 23 CCR § 354.28 and 23 CCR § 354.30. The GSPs should include a map and tables that include each individual RMW along with water quality data for each RMW (this data is currently summarized in Table 8-4 and Table 8-5). This information should be presented clearly so that the public can determine how the proposed monitoring network and sustainable management criteria (SMCs) relate to their own drinking water well or water supply system.
- **Include hexavalent chromium as a contaminant of concern and plan to add contaminants of emerging concern to the monitoring network.** While there is currently not a Maximum Contaminant Level for hexavalent chromium, there is still a Public Health Goal and public health

[53] State Water Resources Control Board. (Dec. 2020). Comments to DWR regarding 180/400 Foot Aquifer GSP. Downloaded from SGMA GSP Portal. Available under the tab "Submitted After Public Comment Period" at: https://sgma.water.ca.gov/portal/gsp/comments/29.

threat posed by this contaminant in drinking water. The State is required to adopt an MCL for chromium-6 again and is in the process of updating the MCL. In addition to including hexavalent chromium, the GSPs must explain how the Plans will be updated to align groundwater monitoring efforts and the sustainable management criteria with any contaminants of emerging concern in the basin and any future new MCLs.

- The text in Section 8.6.2.3 now acknowledges that groundwater pumping can not only cause the movement of contaminant plumes, but can also cause the release of naturally occurring contaminants such as arsenic and chromium. It states:
    - 1. Changes in groundwater elevation could change groundwater gradients, which could cause poor quality groundwater to flow toward production and domestic wells that would not have otherwise been impacted. These groundwater gradients, however, are only dependent on differences between groundwater elevations, not on the groundwater elevations themselves. Therefore, the minimum threshold groundwater levels do not directly lead to a significant and unreasonable degradation of groundwater quality in production and domestic wells.
    - 2. Decreasing groundwater elevations can mobilize constituents of concern that are concentrated at depth, such as arsenic. The groundwater level minimum thresholds are near or above historical lows. Therefore, any depth dependent constituents have previously been mobilized by historical groundwater levels. Maintaining groundwater elevations above the minimum thresholds assures that no new depth dependent constituents of concern are mobilized, and are therefore protective of beneficial uses and users.
- **Include an analysis of the relationship between changes in groundwater levels and groundwater quality concentrations.** In order to clearly evaluate the relationship between changes in groundwater levels and groundwater quality, SVB GSA should undertake an analysis of the change in water quality constituent concentrations relative to change in water levels,[54] particularly over drought periods, to evaluate the potential relationship between water quality

[54] *See* P.A.M. Bachand et. al. Technical Report: Modeling Nitrate Leaching Risk from Specialty Crop Fields During On-Farm Managed Floodwater Recharge in the Kings Groundwater Basin and the Potential for its Management https://suscon.org/wp-content/uploads/2018/10/Nitrate_Report_FInal.pdf. *See also,* Groundwater Recharge Assessment Tool, created by Sustainable Conservation to help groundwater managers make smart decisions in recharging overdrafted basins, including modeling whether a particular recharge project would result in short or long term benefits or harms to water quality, http://www.groundwaterrecharge.org/.

and groundwater management activities.[55] It is our understanding that groundwater quality issues in the Salinas Valley Basin did, in fact, worsen and continue to do so during low groundwater elevations years.[56] Arsenic in the San Jerardo well was at its highest during the lowest groundwater elevation measurement (See CWC Figure 1).

- **Add the total number of wells in each category that will be included in the water quality monitoring network and have SMCs evaluated to Table 8-4. For each constituent of concern, add the number of wells included in the chart and the number exceeding the MT/MO based on the latest sample.** This comment has the same goal as the comment we provided in Chapter 7. SMCs should be set at every public drinking water well and a representative network of drinking water wells that rely on more shallow aquifers. It is essential to track the same wells each year in the monitoring network. If a well is no longer active, it should be removed from the network. In the current representation, it is not clear which wells are included in the monitoring network, which wells have data for each constituent, and which wells are exceeding the regulatory standard.
    - We acknowledge that new information was provided in Chapter 5 that partially addresses this comment, yet we still recommend that the GSP clarify the total number wells in the water quality monitoring network in each category (DDW and ILRP) and that this information be added to Table 8-4.
- **Engage stakeholders and scientists in a transparent discussion regarding "the process the GSAs would use to decide whether or not an exceedance of an MT for water quality degradation was caused by GSP implementation."**[57] The State Water Board recommended that the 180/400 foot aquifer GSP outline this process "otherwise, it is difficult to judge how adequately the GSP addresses undesirable results related to water quality degradation." This relates to the

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[55] More information about groundwater quality and the relationship between changes in groundwater levels can be found in the following resources:
U.S. Geological Survey (USGS). (Sept 2021). *Increased Pumping in California's Central Valley During Drought Worsens Groundwater Quality.* California State Water Resources Control Board's Groundwater Ambient Monitoring and Assessment Program (GAMA). Available at: https://www.usgs.gov/news/increased-pumping-california-s-central-valley-during-drought-worsens-groundwater-quality. *See also,* Stanford, Community Water Center (2019). *Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium.* Available at: https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896. *See also,* Community Water Center. (2019). *Guide to Protecting Drinking Water Quality Under the Sustainable Groundwater Management Act*. https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1559328858/Guide_to_Protecting_Drinking_Water_Quality_Under_the_Sustainable_Groundwater_Management_Act.pdf?1559328858.

[56] U.S. Geological Survey (USGS). (Sept 2021). *Increased Pumping in California's Central Valley During Drought Worsens Groundwater Quality.* California State Water Resources Control Board's Groundwater Ambient Monitoring and Assessment Program (GAMA). Available at: https://www.usgs.gov/news/increased-pumping-california-s-central-valley-during-drought-worsens-groundwater-quality.

[57] State Water Board comments to DWR on 180/400 Foot Aquifer GSP (Dec. 2020). Downloaded from SGMA GSP Portal: https://sgma.water.ca.gov/portal/gsp/comments/29. .

undesirable result for water quality which currently reads: "There shall be no additional minimum threshold exceedances beyond existing groundwater quality conditions during any one year as a direct result of projects or management actions taken as part of GSP implementation."

Chapter 9 Projects and Management Actions

Projects and Management Actions should benefit the basin and all beneficial users.[58] Drinking water users and DACs, who are protected as beneficial users of water under SGMA,[59] can be adversely impacted by either groundwater levels or water quality degradation. Thus, projects and management actions outlined in the GSP, including those currently referred to as implementation actions, should address sustainability issues facing drinking water and other domestic water uses, hold those who cause impacts accountable for remedying them, and address secondary impacts of the projects in order to ensure continued drinking water availability.

While determining how such benefits will be distributed based on the nature of different projects and actions, and who should bear the associated costs, the SVB GSA should keep in mind the **"polluters pay" principle.** Drinking water users should not be put into the position of shouldering additional costs to protect their basic Human Right to Water. Domestic water use has not led to overdraft conditions, as evidenced by the statutory designation of "de minimis" use. Nor should benefits be distributed based on which interested parties can most easily fund a project, but rather towards the overall sustainability of the basin and equity of benefits among beneficial users.

The SVB GSA Subbasin GSPs should (1) clearly identify potential impacts to water quality from all projects and management actions, (2) include management actions that respond to immediate needs and (3) develop a more robust implementation schedule and funding plan for projects and management actions. We acknowledge that the implementation actions are currently in the beginning stages of design but encourage incorporating these elements as soon as possible so that the public and DWR can accurately assess their benefits and feasibility.

Further, because SVB GSA defines its sustainability criteria in a way that potentially allows for drinking water well impacts and because there is so much uncertainty regarding potential domestic well impacts, we recommend incorporating a **Robust Drinking Water Well Mitigation Program.** This program should include the Dry Well Notification System as well as (1) a plan to prevent impacts to drinking water users from dewatering, increases in contaminant levels and increases in salinity, and (2) a plan to mitigate the drinking water impacts that occur even when precautions are taken.

- This type of adaptive management implementation action is crucial to ensuring that all beneficial users within the basin are protected under the GSP. As we have highlighted in previous comments[60]:

[58] As outlined in the Eastside and Upper Valley April 7 meeting materials, soliciting feedback, "[p]rojects implement the GSP and enable the subbasin to reach sustainability by 2042, then maintain sustainability for another 30 years."
[59] Cal. Water Code § 10723.2.
[60] Community Water Center and San Jerardo Cooperative, Inc. Comments on the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan. May 15, 2020. Available at: https://sgma.water.ca.gov/portal/service/gspdocument/download/4012.

- A GSP that lacks a mitigation program to curtail the effects of projects and management actions as to the safety, quality, affordability, or availability of domestic water, violates both SGMA itself and the Human Right to Water (HR2W).[61] The California legislature has recognized that water used for domestic purposes has priority over all other uses since 1913[62] in Water Code § 106, which declares it, "established policy of this State that the use of water for domestic purposes is the highest use of water and that the next highest use is for irrigation."[63]
- The passage of the Safe and Affordable Drinking Water Fund by Governor Newsom indicates a clear State-level commitment to provide safe and affordable drinking water to California's most vulnerable residents.[64] To ensure compliance with the Legislature's long established position, the HR2W requires that state agencies, including the Department of Water Resources and the State Water Board, must consider the effects on domestic water users when reviewing and approving GSPs.[65] Therefore, GSPs that cause disparate impacts to domestic water use are in violation of the HR2W, and cannot be approved in a manner that meets DWR's requirements under SGMA, and Water Code § 106.3.
- It is important to note that SAFER should not be counted on to remedy impacts to domestic wells that result from GSA management. In order for the state to uphold the HR2W, SAFER funds need to be reserved for issues where there are currently no other responsible regulatory authorities to cover the costs. This is not the case where GSAs are managing the groundwater in their basin in a way that allows domestic wells to go dry or degrade water quality. Local prioritization of continued pumping should not be subsidized by the SAFER fund when the demand for those funds already outstrips the available funds nearly 10-fold.[66]
- The SAFER Needs Assessment Executive Summary highlights: "$10.25 billion represents the total estimated cost of implementing interim and long-term solutions for HR2W list systems, At-Risk water systems and well owners."[67]

- In order to effectively protect drinking water users during GSP implementation, we recommend that the GSA's **Drinking Water Well Impact Mitigation Program Implementation Action,** in line with and expanding upon the currently proposed Dry Well Notification System and potentially incorporated into actions carried out under the Water Quality Partnership, should include the following components:

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[61] WAT § 106.3 (a).
[62] Senate Floor Analysis, AB 685, 08/23/2012.
[63] This policy is also noted in the Legislative Counsel's Digest for AB 685.
[64] SB 200 (Monning, 2019).
[65] WAT § 106.3 (b).
[66] SWB. *SAFER Needs Assessment*. Available at: https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/draft_white_paper_indicators_for_risk_assessment_07_15_2020_final.pdf.
[67] SWB. *SAFER Needs Assessment: Executive Summary.* P. 23 Available at: https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/needs/executive_summary.pdf

- **Include a vulnerability analysis of Disadvantaged Communities (DACs) and drinking water supplies in order to protect drinking water for these vulnerable beneficial uses and users.** Although rural domestic and small water system demand does not contribute substantially to the overdraft conditions, drinking water users could face significant impacts, particularly if the region faces another drought. Without a clear commitment and timeline for actions regarding establishing groundwater allocations or reductions in groundwater pumping, the SVB GSA may create disparate impacts on already vulnerable communities. See comments submitted by CWC and San Jerardo Cooperative on April 23, 2021 regarding Chapter 8 of SVB GSA Subbasin GSPs for further recommendations for conducting well impact analyses.
- **Develop a trigger system for both groundwater levels and quality in collaboration with stakeholders, in particular groups that are more susceptible to groundwater elevation and quality changes. Stakeholder recommendations provided back to the GSA should be incorporated into quantifiable measures, such as the GSP measurable objectives, MCLs, and numbers of partially or fully dry drinking water wells.**[68]
- **Ensure that the monitoring network is representative of conditions in all aquifers in general, including the shallow aquifer upon which domestic wells rely.**
- **Routinely monitor for all contaminants that could impact public health, including those with established MCLs, such as nitrates, and contaminants of emerging concern,through the representative water quality monitoring network.** Contaminated drinking water can cause both acute and long-term health impacts and can affect the long-term viability of impacted regions.[69] Among other causes, groundwater contamination can result through the use of man-made chemicals, fertilizers, or naturally-occurring elements in soils and sediments.[70] Routinely monitoring for contaminants will allow the GSA to accurately monitor for impacts on the most vulnerable beneficial users, and protect DACs' and domestic well owners' access to safe and affordable drinking water.[71]
    - **For monitoring network wells with contamination less than 75% of the MCL for all contaminants, the GSP should set MOs at 75% of the MCLs.** The GSP should include MOs as action triggers at 75% of MCL for each constituent of concern so that groundwater can be managed in that area to prevent a minimum threshold

[68] See previous reference for *Framework for a Drinking Water Well Impact Mitigation Program.*
[69] Community Water Center. (2019). Guide to Protecting Drinking Water Quality Under the Sustainable Groundwater Management Act.
https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1559328858/Guide_to_Protecting_Drinking_Water_Quality_Under_the_Sustainable_Groundwater_Management_Act.pdf?1559328858.
[70] See previous Community Water Center (2019) reference.
[71] See previous reference for *Framework for a Drinking Water Well Impact Mitigation Program.*

exceedance at a representative monitoring well.[72] This buffer is particularly critical with contaminants like nitrate that can cause acute health effects. As discussed in previous submitted comments, water quality impacts can intensify as water levels decrease.[73] If the GSA waits until a minimum threshold set at an MCL is exceeded, it may be too late or difficult for actions to be protective of public health and prevent undesirable results. Actions to prevent minimum threshold exceedances should also be clearly explained in this Chapter including a description of what action will be taken, what type of evaluation will be used, under what time period action will take place, and how this action will be funded.

- **Include a combination of different strategies for mitigation including: replacing impacted wells with new, deeper wells, connecting domestic well users to a nearby public water system, or providing interim bottled water.**
- **Include an implementation timeframe, budget, and funding source**.[74] As currently written, the Dry Well Notification System suggests convening "a working group to assess the groundwater situation if the number of wells that go dry in a specific area cross a specified threshold." We support emergency response if one or more wells are impacted, and also request that this section be updated to include strategies to prevent impacts from occuring in the first place. Additionally, plans to address and mitigate those impacts should be solidified beforehand so resources can be mobilized in a timely manner. Drinking water users cannot afford to wait for interim plans to be developed once their primary sources of water for drinking, cooking and hygiene are compromised.

In response to our previous comments, the SVB GSA stated:

> "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."

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[72] This recommendation was also made previously in a comment letter to SVB GSA from CWC and San Jerardo Cooperative regarding Chapter 8 of the 180/400 ft Aquifer GSP on November 25, 2020, as well as in our comments to the SVB GSA on April 23, 2021 regarding Chapter 8 of drafts for the SVB GSA Subbasin GSPs.

[73] Community Water Center and Stanford University. Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium. (2019). https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

[74] See previous reference for *Framework for a Drinking Water Well Impact Mitigation Program.*

Our response:

A drinking water well mitigation program deals with more than just water quality. Such a program also protects wells from becoming dewatered due to lowering groundwater levels. As both pertain to the GSA's mandate to manage pumping in the basin in a way to avoid undesirable results, a drinking water well impact mitigation programs would be appropriate and should be required in the SVB GSA Subbasins.

- In regard to water quality, the GSA has responsibilities, mandated by statute, to prevent significant and unreasonable degradation of water quality.[75] DWR has clarified that water quality is a meaningful component of GSA management and has specifically given corrective instructions to SVB GSA, as cited in our prior comments and above. As this is such a critical point of contention with the GSA, we again quote this section from DWR's 180/400 foot Aquifer Determination:
    - "[S]taff find that the approach to focus only on water quality impacts associated with GSP implementation, i.e., GSP-related projects, is **inappropriately narrow.** Department staff recognize that GSAs are not responsible for improving existing degraded water quality conditions. **<u>GSAs are required; however, to manage future groundwater extraction to ensure that groundwater use subject to its jurisdiction does not significantly and unreasonably exacerbate existing degraded water quality conditions."</u>**[76]
    - DWR clearly identifies the responsibility of the GSA to manage future groundwater extraction in order to prevent significant and unreasonable degradation of water quality conditions. DWR does not limit this duty to merely apply when the GSA regulates groundwater pumping for the purpose of maintaining sustainable groundwater levels, but rather posits an affirmative duty for the GSA to manage extraction in order to avoid exacerbating existing degraded water quality conditions. SVB GSA's jurisdiction does not hinge on whether or not a Subbasin Committee decides to instate allocations or pumping restrictions. SVB GSA does not have the power to discard this authority by opting against regulating pumping. Instead, SVB GSA is exercising its authority as an affirmative action to continue to allow pumping at current rates.
- DWR clarifies further:
    - "Where natural and other human factors are contributing to water quality degradation, the GSAs may have to confront complex technical and scientific issues regarding the **causal role of groundwater extraction and other groundwater management activities**, as opposed to other factors, in any continued degradation; but **<u>the analysis should be on whether groundwater extraction is causing the degradation</u>**

[75] Cal. Water Code § 10721(x)(4).
[76] Department of Water Resources. (2021). *Statement of Findings Regarding the Approval of the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan.* Pp. 26-27. (Internal citations omitted; emphasis added). Available for download at: https://sgma.water.ca.gov/portal/gsp/status.

in contrast to only looking at whether a specific project or management activity results in water quality degradation."[77]

  - SVB GSA must establish a viable plan to prevent the exacerbation of degraded water quality conditions in the basin. In response to previous comments, SVB GSA asserted, "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."

Recharge Projects (Direct or Indirect)

We offer the following overarching comments regarding Recharge Projects in the Subbasin GSPs:

- **Assess constituents in the ground before using land for recharge, to avoid further contamination.** Reference the Groundwater Recharge Assessment Tool (GRAT) developed by Sustainable Conservation.[78]
  - On-farm recharge has the potential to further spread contaminants. Soil contaminants should be measured before dedicating the land to recharge purposes. "Short-term" impacts on domestic wells due to recharge efforts, which can include increased leaching of certain contaminants such as uranium, or displacement of contaminant plumes, should be mitigated in order to minimize the harm to beneficial drinking water users, and to replace water sources if compromised.[79]
- **In order to achieve successful recharge management, the GSA must identify where groundwater contaminant plumes are currently located, in order to then assess whether recharge projects could cause problematic movement of plumes. Implement recommendations from our previous comment letters regarding Section 5.4:**
  - "**[I]nclude a specific discussion, supported by maps and charts, of the spatial or temporal water quality trends for all constituents that have been detected in the subbasin and may affect drinking water beneficial users, as required under 23 CCR § 354.16(d).** This section should include water quality data (both in map and tabular form) for all constituents (where available) with primary drinking water standards that have been detected in the subbasin including, but not limited to, nitrate, 123-trichloropropane, hexavalent chromium, arsenic, uranium, and perchlorate for all public drinking water wells, state and local small water system wells, and private domestic wells. It is especially important for all groundwater stakeholders to be able to understand and visualize the location of contaminant hotspots throughout each subbasin.

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[77] *Id.*

[78] Sustainable Conservation. *Groundwater Recharge Assessment Tool.* Available at: https://suscon.org/wp-content/uploads/2016/08/GRAT-Summary-8-2017.pdf.

[79] Community Water Center and Stanford University (2019). *Groundwater Quality in the Sustainable Groundwater Management Act (SGMA): Scientific Factsheet on Arsenic, Uranium, and Chromium*. Available at: https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1560371896/CWC_FS_GrndwtrQual_06.03.19a.pdf?1560371896.

    - **Present maps and supporting data for all constituents of emerging concern.** The review of water quality data in the groundwater conditions section of the draft Section 5.4 in the subbasin GSPs is focused primarily on nitrate. The GSPs identify numerous constituents that have been detected in groundwater above drinking water standards, but, with the exception of nitrate, do not present this data spatially. Even though the subbasin GSPs set water quality minimum thresholds for additional constituents (See Tables 8-4 and 8-5), the supporting data is not all presented, and no analyses of spatial or temporal water quality trends are presented. This does not present a clear and transparent assessment of current water quality conditions in the subbasin with respect to drinking water beneficial use (23 CCR § 354.16(d)).”[80]
- We appreciate the identification of multi-benefit improvements to streams, and agree that slowing the speed of groundwater in its course of movement is a useful way to increase recharge. Such improvements to multi-benefit streams are a cost-effective and low-harm recharge method.

Reoperation of Reservoirs

We offer the following overarching comments regarding Reoperation of Reservoirs projects:

- **Conduct holistic cost-benefit analyses for large-scale infrastructure projects such as the MCWRA Interlake Tunnel and Spillway Modification, taking into account the specific benefits that projects will or will not confer on underrepresented communities and DACs, including the San Jerardo Cooperative in the Eastside Subbasin.**
    - Benefits should be equitable and take into account how different climate projections would impact the potential benefits from such a project in the case of little to no rainfall.
    - Cost-benefit analyses should also consider alternatives that could provide affordable long-term benefits.
- **The MCWRA Drought TAC should ensure that all beneficial water users are considered, and that drinking water needs are particularly protected from harm during current and future droughts, in line with the Human Right to Water.**

Management Actions

Conservation and Agricultural BMPs

- **Best Management Practices (BMPs) should utilize the latest technologies and take advantage of opportunities to modify agricultural pumping needs in order to provide overall groundwater basin benefits for all beneficial users.**

[80] Community Water Center and San Jerardo Cooperative, Inc. *Comments on the Draft Salinas Valley GSP Chapters 1-8 for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins.* (April 2021). P. 7. On file with SVB GSA and available at: https://drive.google.com/file/d/1wH7wvCMmQd4bu_PIri5o66_y5caW9ti7/view.

- **BMPs should also be used as a mechanism to improve or stabilize groundwater quality by using evapotranspiration (ET) data with soil moisture sensors and soil nutrient data to promote efficient irrigation practices and limit the application of synthetic fertilizers.**
- **BMPs should include best available science, including climate-smart approaches and nature-based solutions which have been recognized on state, national, and international levels.** For example, while written with the Central Valley in mind, FoodFirst's *Healthy Soils, Healthy Communities* outlines the following strategies and benefits which can also be applied to the Central Coast:
    - **Soil organic matter can reduce soil fumigant emissions** – Pesticides applied directly to soils form short-lived climate pollutants, and contribute to air and water pollution. Increased soil organic matter can reduce fumigant emissions and reduce the need for fumigants in the first place.
    - **Soil organic matter slows water contamination** – Synthetic fertilizer and pesticides have contaminated drinking water in the Central Valley over the last 70 years. Soils higher in organic matter leach fewer pollutants, including nitrates and pesticides. Soils high in organic matter also require less synthetic fertilizer to produce a crop. Using compost instead of synthetic fertilizer can reduce nitrogen loads in the area. Over time, increased soil organic matter and riparian restoration could help reduce groundwater contamination.
    - **Composted manure from dairies could be a source of soil organic matter** – Concentrated manure from industrial dairies is a major local air quality and water quality issue. If that manure were properly composted, it could become a source of valuable nutrients and soil organic matter instead of a pollutant, and help displace the use and manufacture of synthetic fertilizers.[81]
    - **Composting farm waste could prevent black carbon emissions** – Instead of burning orchard waste, another local air pollutant, mulches and composted farm waste could be a source of soil organic matter for farms and rangelands.
    - **BMPs are an opportunity for rural workforce development and wildfire management** – From the Conservation Corps, to ecological restoration, nursery stock production, wetland management and fire prevention, there is a lot of work to do to conserve and increase terrestrial carbon on public and private lands. This is an opportunity to both train and employ young people with low-to-moderate incomes and in communities of color in natural resource and agricultural management.
    - **Carbon-friendly practices can support small-scale and immigrant farmers** – Public support for carbon-friendly practices could help make small to mid-scale and immigrant farmers more resilient and boost their bottom line through a combination of financial support for carbon-friendly practices and more stable land access. These programs will

[81] USDA. *Manure in Organic Production Systems.* Available at: https://www.ams.usda.gov/sites/default/files/media/Manure%20in%20Organic%20Production%20Systems_FINAL.pdf. (Citation added).

have to be accessible to small-scale farmers and take into account chronic issues around access to land, credit and technical assistance.

Fallowing, Fallow Bank, and Agricultural Land Retirement

- **Dewatered drinking water wells or migration of contamination plumes should be considered as factors when deciding where to incentivize targeted agricultural fallowing or land retirement, and should trigger pumping restrictions in affected areas as necessary.**
    - This approach is further elaborated in the Drinking Water Well Impact Mitigation Framework.[82]

SMC Technical Advisory Committee (TAC)

- **Ensure that this TAC functions as a public decision-making space and not a consultative committee.** Discussions regarding SMCs and how or whether to intervene when conditions approach MTs should be fully public and held under Brown Act rules. These discussions are core to the management of the basin and necessarily must be informed by stakeholder input.
    - Additionally, plans to prevent and/or mitigate potential undesirable results should be finalized *prior* to the emergence of such conditions. We note that the formerly proposed Forebay Drought/Pumping TAC has been adapted to mirror the Upper Valley's SMC TAC and emphasize that planning for drought conditions must be done before those conditions arise, not as an improvised reaction in the moment. Such a delay in planning would be counter to the spirit and letter of SGMA.
- **Create management zones with pumping restrictions in areas with vulnerable drinking water wells.**
- **The SMC TAC should consider and recommend projects and management actions that mitigate groundwater quality degradation for drinking water users due to GSA actions, including impacts resulting from over-extraction under GSA management, as was clarified in DWR's 180/400ft Aquifer Determination Letter on pages 26 and 27.**

Pumping Allocations and Control

- **Quantify the demand reductions (pumping restrictions) necessary to meet all minimum thresholds in the short and long term, including in dry conditions.** Designing a feasible and effective allocation structure requires thorough groundwater elevation data as well as a comprehensive, ongoing assessment of the interrelated effects of SMCs on one another. Pumping allocations must be responsive to groundwater conditions throughout the basin and avoid undesirable results.
- **Parameters for pumping restrictions in times of widespread water shortages should be decided ahead of time as part of a publicly-informed, adaptive management approach.** Decisions around pumping regulation should be made as part of GSP development and not relegated to a later decision-making body which will be inherently less accountable to the public than SVB GSA's current Committees and Board. It will not be sufficient to solely bring pumping

[82] Self-Help Enterprises, Leadership Counsel for Justice and Accountability, Community Water Center. (2020). *Framework for a Drinking Water Well Impact Mitigation Program*. Available at: https://static1.squarespace.com/static/5e83c5f78f0db40cb837cfb5/t/5f3ca9389712b732279e5296/1597811008129/Well_Mitigation_English.pdf.

decisions to the public after actions have already been designed and are at the point of being approved. Lack of public input for such a critical component of the GSA's management is especially troubling in the negative—if action is not being taken.

- **As part of an adaptive management approach, pumping restrictions should be implemented by the GSA in a timely way so as to prevent harm to beneficial users, particularly vulnerable drinking water users and DACs.**
- **Consider hybrid allocation systems which account for de minimis users, regardless of homeownership status, to ensure sustainable yields for all beneficial users.** Langley GSP proposes such a hybrid allocation system in which de minimis users are included within the estimated sustainable yield. This approach will provide a more complete picture of groundwater use within the basin, to inform groundwater management decisions.

Implementation Projects

CWC and San Jerardo see value in the projects listed in this section, though we point out insufficiencies below and offer recommendations for how these proposed projects should be adjusted so that they will support SVB GSA in coming into compliance with SGMA. We also note that "Implementation Projects" is a separate category of GSA management activities that SGMA does not specify, and believe these projects should be integrated into either the Projects or the Management Actions sections.[83] GSA activities that are necessary to meet SGMA requirements, such as those intended to prevent a water quality UR, should fit within either Projects or Management Actions.

Groundwater Elevation Management System (GEMS) Expansion

- **Include data from more drinking water wells, including small water system wells and domestic wells, in order to have a sufficiently representative monitoring program.**

Water Quality Partnership (formerly Domestic Water Partnership)

CWC would like to voice conditional support for the Water Quality Partnership, as a step towards coordinating local and regional responses to water quality issues. However, the GSA remains directly responsible for recognizing and resolving water quality degradation that results from its policies and projects.

- The GSA must clarify the role that it will play in this partnership in dealing with water quality issues. Water quality is an integral part of SGMA, one of the six Undesirable Results that GSAs are tasked with preventing while achieving sustainability.[84] Impacts from extraction, including due to overdraft and projects and management actions undertaken by the GSA, fall under the purview of the GSA and should be tracked and remedied according to the GSP. Thus, the GSP must include plans to respond to problems should they arise. If, for example, a contaminant plume were to begin migrating based on pumping patterns or a project/MA, the GSA is not permitted to allow that problem to progress unchecked. If the GSA wishes to collaborate with

[83] 23 CCR § 354.44

[84] Cal. Water Code § 10721, subd. (x)(4). "Undesirable result" means one or more of the following effects caused by groundwater conditions occurring throughout the basin: ...(4) Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies.

other regulatory agencies who also deal with water quality issues as a way to fulfill its obligations, the GSA should enter into a Joint Powers Agreement (JPA) or a formal Memorandum of Understanding (MOU) in order to formalize the roles and responsibilities. Otherwise, DWR cannot determine whether the plan is sustainable.[85]

- As currently drafted, the Water Quality Partnership only guarantees one meeting per year, and a review of water quality conditions resulting in a report. These proposed actions are not sufficient to ensure that the GSA is equipped to prevent or react to exacerbated water quality should those impacts occur.
- **The GSA should work with local and regional water agencies or the county to implement groundwater quality remediation projects to prevent degradation and potentially improve both groundwater quality as well as groundwater levels to ensure groundwater management does not cause further degradation of groundwater quality.[86]** The strategic governance structure of GSAs can uniquely leverage resources, provide local empowerment, centralize information, and help define a regional approach to groundwater quality management, unlike any other regional organization. When implemented effectively, GSPs have the potential to be instrumental in reducing levels of contaminants in their regions, thus reducing the cost of providing safe drinking water to residents. GSAs are the regional agency that can best comprehensively monitor and minimize negative impacts of declining groundwater levels and degraded groundwater quality that would directly impact rural domestic well users and DACs within their jurisdictions. When potential projects are proposed, SVB GSA should consider how projects could potentially both positively and negatively impact groundwater quality conditions and should take leadership in coordinating regional solutions.
- **Include - without delay - Monterey County water quality data for state and local small water systems.** This data is readily available and would add significantly to the proposed water quality monitoring network in draft subbasin Chapters 7. We do not want this potential partnership implementation/management action to delay the incorporation of this important data source. This action can and should, however, integrate this County data into current draft subbasin plans in order to identify potentially vulnerable populations and create management actions to protect them.
- **Integrate key components of a Drinking Water Well Mitigation Program Framework in order to protect drinking water users from losing access to their drinking water during GSP implementation.** CWC was informed by SVB GSA Staff that concepts from the Mitigation Framework were being incorporated into the Water Quality Partnership language in the GSP, but we do not see evidence of this in the current draft. CWC would like to coordinate with SVB GSA Staff to incorporate this item into the agenda of one or more of the remaining 2021 Advisory and Board meetings in order to present on the Framework to the Committees and Board.

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[85] Cal. Water Code §§ 10721, subd.(x)(4) and 10723.6.
[86] Community Water Center and San Jerardo Cooperative, Inc. *Comments on the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan.* May 15, 2020. On file with SVB GSA and available at: https://sgma.water.ca.gov/portal/service/gspdocument/download/4012.

- **Integrate water quality considerations across planning and implementation.** As now acknowledged in the GSPs, groundwater quality in the Subbasins can be influenced by pumping and the way groundwater is managed. This is of particular importance for the San Jerardo Cooperative which has experienced increases in nitrate and arsenic in their well, as highlighted in our cover letter and previous comments.[87] This relationship between groundwater levels and groundwater quality should be reflected throughout planning and implementation so that the GSA can manage the basin in a way that does not exacerbate water quality degradation.
    - Support for this recommendation is evidenced by Recommendation #5 of DWR's 180/400 GSP Determination.
- **Fill previously identified water quality data gaps in baseline information and the monitoring network.**
    - DWR assessed water quality monitoring in the 180/400 Foot Aquifer as follows: "The monitoring network to evaluate degradation of groundwater water quality is based on three existing water quality regulatory programs operating in the Subbasin: Monterey County's small community water system wells program, the State Water Resources Control Board's public supply well program, and the Central Coast Water Board's Irrigated Lands Regulatory Program. The Plan proposes to use four sets of wells that are routinely sampled under these programs. Within each set of wells, a specific set of constituents of concern will be monitored. In total, the monitoring network consists of 136 small community water system wells, 51 public supply wells, and a currently unknown number of domestic and agricultural wells from the Irrigated Lands Regulatory Program. The specific number of Irrigated Lands Regulatory Program wells will be finalized when the Central Coast Water Board adopts Agricultural Order 4.0 (anticipated in 2020). The Plan identifies the lack of well construction information (e.g., the depth of well screens or the total depth of the well) for many groundwater quality monitoring wells as a data gap. The implementation chapter of the Plan simply states that "[d]uring implementation, the SVBGSA will obtain any missing well information, select wells to include in monitoring network, and finalize the water quality network." Department staff recommend the SVBGSA provide updates on the progress toward filling this data gap in its annual reports and that more details be provided in the first five-year assessment of the Plan."[88] The remaining SVB GSA Subbasins should match a similar standard for their monitoring systems, and anticipate the need to show progress on filling data gaps in annual reports and at the five year update.

[87] Community Water Center and San Jerardo Cooperative, Inc. *Comments on the Draft Salinas Valley GSP Chapters 1-8 for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins.* (April 2020). Pp. 4-5. On file with SVB GSA and available at: https://drive.google.com/file/d/1wH7wvCMmQd4bu_PIri5o66_y5caW9ti7/view.

[88] Department of Water Resources. (2021). *Statement of Findings Regarding the Approval of the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan.* Pp. 30-31. (Internal citations omitted). Available for download at: https://sgma.water.ca.gov/portal/gsp/status.

Dry Well Notification System (Previously Localized Groundwater Elevation Triggers)

The Dry Well Notification System, which is designed to "assist well owners (domestic or state small and local small water systems) whose wells go dry due to declining groundwater elevations" is an important potential component of the Subbasin GSPs, for tracking and responding to impacts due to droughts and overdraft. We support the inclusion of a "notification system whereby well owners can notify the GSA or relevant partner agency if their well goes dry," particularly linking them to DWR's reporting website. We also support the proposal that the GSA "could set up a trigger system whereby it would convene a working group to assess the groundwater situation if the number of wells that go dry in a specific area cross a specified threshold. A smaller area trigger system would initiate action independent of monitoring related to the groundwater level SMC." We encourage SVB GSA to commit to incorporating this project into implementation. Implementation of the Dry Well Notification System would significantly increase the GSA's ability to track and address impacts to domestic wells. To further improve upon the program's efficacy, we recommend:

- **Integrate technical assistance into this program, facilitate access to resources through a collaboration with state agencies and/or directly administer impact mitigation funding.**
    - Tracking instances of dry or depleted wells and linking impacted beneficial users to information about potential available resources is a positive step, however services such as directing DACs and other impacted drinking water users to apply for funding would only be minimally helpful while those households are experiencing a water shortage crisis. The GSA's efforts to respond to impacts due to low groundwater elevations should go further in order to be effective. Such services should include reducing pumping in areas where groundwater supply shortages are being exacerbated by over extraction, actively facilitating coordination between residents and assistance programs, and potentially providing a conduit to state funds directed towards water resiliency—a multi-billion dollar drought & water resiliency package was recently passed by the State Legislature.

Well Registration

- **We recommend that SVB GSA require all wells that pump over two acre-feet per year to be metered and charge fees based on the amount of water pumped, to pay for future projects and incentivize voluntary reductions.**

Support Protection of Areas of High Recharge

- **Develop criteria for recharge projects that prevent unintended impacts to drinking water.**
- **As with all recharge projects, evaluate whether recharge could have any unintended consequences such as moving contaminant plumes toward wells, thus degrading the water quality, and closely monitor water quality in all areas affected by recharge.** The GSP states that "[t]hese areas are typically identified using soils and soil classification maps but would need additional investigation and data to confirm." Accurate mapping of water quality issues in the basin is also crucial in order to prevent unintended water quality impacts.
- **Where applicable, encourage use of low-impact cover crops where water is captured at the site of precipitation or flooding.** Roots in the soil help to capture more water, clean the water source, and maintain healthy soils so that less fertilizer/pesticide is used, as evidenced in organic

and regenerative agricultural practices. Cover crops and compost cycles, as well as chicken manures or natural organic-matter fertilizers can also keep nitrogen in the soil longer, providing benefits to crops and keeping nitrate out of groundwater.

<u>Deep Aquifers Study</u>

- We support the Deep Aquifers Study due to the influence that hydrogeologic interconnections between aquifers in the Salinas Valley Basin would necessarily have on influencing better sustainable management of the basins.

New Water Supply Projects

- **Quantify which combinations of projects could address projected overdraft and what the costs of those combinations would be.** With high costs, permitting and other challenges, there is a high degree of uncertainty whether each project can be implemented. As written, it is difficult to evaluate how feasible it is to address overdraft via the options provided.
    - For example, in the Eastside GSP draft, Table 6-15 in Chapter 6 projects 20,400 AF/yr overdraft in 2030 and 20,500 AF/yr overdraft in 2070. Table 9-8 in Chapter 9 lists projects that could mitigate overdraft. However, Table 9-8 only quantifies benefits for some of the projects, and often for the Salinas Valley basin as a whole as opposed to the Eastside Subbasin. The table also omits costs. This information will be critical for planning and implementing projects to address overdraft.
- **Factor in known uncertainties when determining which projects to prioritize in implementation.** At the top of pg 9-24 for 11043 Diversion at Chualar, and also for 11043 Diversion of Soledad, the GSP states that the groundwater model used to estimate Salinas River flows "does not account for the uncertainty surrounding greater variations in precipitation, timing, intensities and subsequent flows." The model should provide a sensitivity analysis for potential conditions, particularly in light of large variations between climate change predictions in the region.
    - This recommendation is also in line with DWR's 180/400 Determination which instructs SVB GSA to determine how they will define "average hydrogeological conditions," in Section 4.3.3.2 and the overarching statutory requirement to continually update the GSP to meet the statutory requirement to use the "best available information and best available science."[89]
- **Where projects overlap between subbasins, clarify what effects the project will have across subbasins.** For example, provide clarity around what effects the Eastside Irrigation Water Supply Project (or Somavia Road Project) will have on the 180/400 Foot Aquifer Subbasin where water will be pumped from. Account for any effects in the 180/400-Foot GSP in ongoing updates, including pertinent sections of Annual Reports.

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[89] 23 CCR § 355.4(b)(1). "When evaluating whether a Plan is likely to achieve the sustainability goal for the basin, the Department shall consider the following:
(1) Whether the assumptions, criteria, findings, and objectives, including the sustainability goal, undesirable results, minimum thresholds, measurable objectives, and interim milestones are reasonable and supported by the best available information and best available science."

- **Quantify what the sustainable yield is for the entire basin.** This calculation should be done to ensure that the water budgets balance across all the Subbasin Plans.

GSP Chapter 10: Groundwater Sustainability Plan Implementation

Our overarching recommendations for GSP Implementation and Updates are as follows:

- **Take interim actions while working toward long-term sustainability.**
- **Address missing data for domestic wells as recommended by DWR:**
    - "[T]he GSA should inventory and better define the location of active wells in the Basin and document known impacts to drinking water users caused by groundwater management … in subsequent annual reports and periodic updates."[90]
- **Continue to include the small water system data from the County as a data gap in the subbasin GSPs, as it was in the 180/400 foot Aquifer GSP.** As Tom Berg, a DWR representative, indicated at the SVB GSA Advisory Committee meeting on June 17, 2021, the specific decisions made during the formation of the 180/400 foot Aquifer GSP allowed for it to receive DWR's approval. Mr. Berg recommended that the SVB GSA review the three other letters that DWR released on June 3, 2021, to better understand the parameters of what is required for a GSP to receive approval.
- **Engage underrepresented communities immediately.** As this section acknowledges, underrepresented communities have little or no representation in water management and have often been disproportionately less represented in public policy decision making. It is important to note that their engagement and input around their main concerns must be noted and considered during routine GSA proceedings. Their input should be (or rather should have been) solicited and received while the GSP formation process is/was still active.
- **Continually update the GSP and Implementation strategy as best available science[91] evolves.** Meaningful updates to data sources and interpretation should occur at a minimum on a yearly basis, timed with the Annual Reports.

[90] Department of Water Resources. (2021). *Statement of Findings Regarding the Approval of the 180/400 Foot Aquifer Subbasin Groundwater Sustainability Plan.* P. 24. Available for download at: https://sgma.water.ca.gov/portal/gsp/status.

[91] 23 CCR § 355.4(b)(1).

October 15, 2021

Via Electronic Mail

Colby Pereira, Chairperson
Members of the Board of Directors
Salinas Valley Basin Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA 93924
Email: board@svbgsa.org

Subject: Comments on Draft Groundwater Sustainability Plans for the Upper Valley Aquifer, Forebay Aquifer Subbasin, Eastside Aquifer Subbasin, Langley Aquifer Subbasin, and Monterey Subbasin

Dear Chair Pereira and Members of the Board of Directors:

Thank you for the opportunity to submit comments. The following comments are offered on behalf of the members of California Coastkeeper Alliance and Monterey Waterkeeper.

Our comments are offered for all subbasin groundwater sustainability plans, including for the Upper Valley Aquifer, Forebay Aquifer Subbasin, Eastside Aquifer Subbasin, Langley Aquifer Subbasin, and Monterey Subbasin (collectively "GSPs"). Given the interdependence of the planning for all subbasins, comments are relevant to all the GSPs and the approach of the Salinas Valley Basin Groundwater Sustainability Agency ("SVBGSA") as applied to every subbasin. There is urgency to begin implementing meaningful projects and management actions which are protective of all beneficial uses of water, and we voice our agreement with the comments Community Water Center and LandWatch Monterey County have provided on plans developed by the SVBGSA and incorporate them here by reference.[1]

1. **Overview of Requirements for Groundwater Sustainability Plans Under the Sustainable Groundwater Management Act.**

The Sustainable Groundwater Management Act ("SGMA") requires the SVBGSA to include findings in the GSPs demonstrating the sustainability goal is likely to be achieved within 20 years of Plan implementation and is likely to be maintained through the planning and

[1] All comments on the GSPs and the 180/400 Foot Subbasin Plan through October 15, 2021, including comments to the Department of Water Resources.

implementation horizon.[2] Projects and management actions must be sufficient to support a determination that the GSPs will achieve the sustainability goal,[3] including descriptions of "circumstances under which projects or management actions shall be implemented, the criteria that would trigger implementation . . . and the process by which the Agency shall determine that conditions requiring the implementation of particular projects or management actions have occurred."[4] Time-tables for initiation and completion must be included,[5] along with an explanation of how the project or management action will be accomplished. Sustainability Plans must identify and *cause* the implementation of projects and management actions.[6] Providing concrete triggers and timetables for implementation is a critical and required component for demonstrating the GSPs are likely to meet the sustainability goal.

The GSPs are also required to support decisions with the best available science,[7] while Sustainable Management Criteria ("SMCs") and projects and management actions must be commensurate with the level of understanding of the basin setting.[8]

2. The Disparity Between the Basin-Wide Integrated Management Approach of the 180/400 Aquifer Subbasin GSP, and The Remaining GSPs Must Be Resolved.

The GSPs do not satisfy the SVBGSA's duty under SGMA because of conflicts between the approaches across the numerous GSPs and the 180/400 Foot Aquifer Plan. Plans for adjacent basins must not adversely affect the ability of one another to maintain their sustainability goals over the planning and implementation horizon.[9] We voice our agreement with comments LandWatch Monterey County has provided to the SVBGSA outlining concerns with consistency across the SVBGSA's GSPs, namely that inconsistency undermines the likelihood that any of the SVBGSA's subbasin plans will achieve their sustainability goals.

The groundwater sustainability plan for the 180/400 Ft Aquifer that was approved by the Department of Water Resources ("DWR") identifies 13 projects that "constitute an integrated management program for the entire Valley."[10] However, this basin-wide integrated management program has not been carried forward into the GSPs being drafted now. The GSPs each identify different sets of projects, which are also different from the projects identified in the 180/400 GSP. There is little overlap among the projects, and there are no projects that are common to all of the GSPs. Perhaps the most problematic example relates to the water charges framework. DWR relied on the feasibility and likelihood of the integrated set of basin-wide projects funded by the basin-wide water charges framework:

[2] 23 CCR § 354.24 (requiring discussion of measures that will be implemented to ensure likely achievement of sustainability goal).
[3] 23 CCR § 354.44(a).
[4] 23 CCR §§ 354.44(b)(1)(A).
[5] 23 CCR §354.44(b)(4).
[6] 10721(u) (emphasis added).
[7] *See* Cal. Water Code § 113; 23 CCR § 355.4.
[8] 23 CCR § 350.4.
[9] 23 CCR §350.4(f),
[10] 180/400 Aquifer plan, p. 9-25.

> The water charges framework, at this time, appears feasible and reasonably likely to mitigate overdraft, which is an important management action to help prevent undesirable results and ensure that the 180/400 Foot Aquifer Subbasin is operated within its sustainable yield.[11]

DWR considers the water charges framework to be the "fundamental structure of groundwater management" for the 180/400 Foot Subbasin.[12] The framework was intended to be implemented across all the SVBGSA basins.[13] However, the Upper Valley and Forebay Plans reject the Water Charges Framework,[14] meanwhile the Eastside, Monterey, and Langley plans do not mention the water charges framework in their discussions of funding options.[15]

The disparity between the basin-wide integrated management approach of the 180/400 Aquifer Subbasin GSP and the lack of integrated approach of the remaining GSPs must be resolved. After undertaking the process of developing and approving plans, a GSP must be implemented.[16] The conflict between the GSPs and the 180/400 Foot Aquifer Plan undermines the likelihood the approved 180/400 Foot Subbasin Plan will achieve its sustainability goal.

3. **Timelines for Implementation of Plans Must Be Concrete and Conservative to Ensure the Sustainability Goal Is Fulfilled.**

The GSPs do not satisfy the SVBGSA's duty to demonstrate a likelihood of achieving the sustainability goal by describing how projects and management actions are sufficiently concrete to be relied upon. The GSPs also fail to adequately address evidence of changing water supplies.

As a result of the passage of time, the SVBGSA forecloses its options to manage the basin sustainably. The SVBGSA is responsible for managing the basin sustainably, including being responsible for its choices *not* to initiate projects in a timely manner. Said differently, the choice to allow the status quo to persist is a management decision, the consequences of which the SVBGSA is responsible for under SGMA.

The urgency to begin implementation and commit to a *viable* strategy cannot be overstated. An increasing body of climate change research shows that drought will continue to intensify. For example, NOAA summarized the updated consensus on drought last month:

> The warm temperatures that have helped make this drought so intense and widespread will continue (and increase) until stringent climate mitigation is pursued and regional warming trends are reversed. As such, continued greenhouse gas warming of the U.S.

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[11] DWR, Statement of Findings, 180/400 Foot Aquifer Subbasin, p. 2.
[12] DWR, GSP Assessment Staff Report, 180/400 Foot Aquifer Subbasin (June 3, 2021), p. 31.
[13] DWR, GSP Assessment Staff Report, 180/400 Foot Aquifer Subbasin (June 3, 2021), p. 5 ("Groundwater users will be allowed to pump more than their sustainable allocation; however, this additional pumping (supplemental pumping) will be subject to higher extraction fees. The proposed water charges framework is also proposed to be instituted in the other five groundwater subbasins overseen by the SVBGSA, representing a Salinas Valley Basin-wide management action")
[14] Forebay GSP at 10-15 to 10-16; UVA GSP at 10-15 to 10-16.
[15] Eastside GSP at 10-15; Monterey GSP at 10-23; Langley GSP at 10-15.
[16] Cal. Water Code § 10727(a)

> Southwest will make even randomly-occurring seasons of average- to below-average precipitation a potential drought trigger, and intensify droughts beyond what would be expected from rainfall or snowpack deficits alone.[17]

We concur with Community Water Center's objections to the GSPs relying on the "Central Tendency" scenario in DWR's guidance.[18] Besides the fact that expectations of future drought scenarios have changed since DWR's guidance was published in 2018, the guidance itself encourages groundwater sustainability agencies to analyze the more extreme Dry-Extreme Warming and Wet-Moderate Warming scenarios. There is no reasonable basis for not following DWR guidance and analyzing these scenarios, and choosing not to consider these scenarios constitutes a failure to consider the best available science and information as required by SGMA.

Conservative estimates and plans for water budgeting will protect front line communities from the immediate impacts of groundwater overdraft. The GSPs are expressly required to consider these impacts by SGMA[19] and to ensure consistency with California's Human Right to Water Law[20] which holds up each person's right to have safe, clean, affordable, and accessible water. Overestimating the sustainable yield will undermine the likelihood of maintaining the sustainability goal through the planning and implementation horizon as required under SGMA.[21] Unfortunately, underrepresented communities and ecological and recreational beneficial uses will be the most impacted by the GSPs' failures in the short and long-term.

The SVBGSA's reliance on projects and management actions (such as large infrastructure projects) with uncertain viability due to issues including lack of funding and unpredictable political and permitting regimes that are outside its control does satisfy its legal duties. The SVBGSA must provide concrete triggers and timelines for projects within its control, including pumping restrictions, to demonstrate a likelihood of avoiding undesirable results and meeting the sustainability goal as required under SGMA. Indeed, the State Water Resources Control Board has emphasized to the SVBGSA the importance of establishing specific and reasonable timelines with respect to projects that may be reliant on water rights, including pumping restrictions.[22] Failure to avoid undesirable results, including sea water intrusion impacts, will be devastating, and will create irreversible and expensive impacts for the entire region to deal with once they occur. Management actions that will have an immediate, quantifiable impact, including limiting new wells and taking the necessary steps to initiate pumping restrictions must be included in the GSPs because they provide certainty and therefore are reasonably likely to help meet sustainability goals for the region as SGMA requires.

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[17] NOAA Drought Task Force Report on the 2020–2021 Southwestern U.S. Drought, September 21, 2021. Available at https://www.drought.gov/documents/noaa-drought-task-force-report-2020-2021-southwestern-us-drought

[18] Community Water Center Comments on the Draft Salinas Valley GSP Chapters 1-8 for the Langley, East Side, Forebay, Upper Valley and Monterey Subbasins, April 23, 2021, p. 11-14

[19] Cal. Water Code §10723.2.

[20] Cal. Water Code § 106.3.

[21] *See* 23 Cal Code of Reg ("CCR") § 354.24.

[22] State Water Resources Board letter to Craig Altare, Supervising Geologist, SGMA Office, Department of Water Resources, 180/400 Foot Aquifer Groundwater Sustainability Plan (December 8, 2020).

4. **The Sustainable Management Criteria and Management Actions for Depletion of Interconnected Surface Waters are Deficient and Violate SGMA and Public Trust and Reasonable Use Doctrines.**

Ecological and recreational surface water beneficial uses are not adequately protected under the GSPs.

A. Legal Background and SVBGSA's Duties Related to Depletion of Interconnected Surface Waters.

Plans are required to define sustainable groundwater management by first characterizing undesirable results.[23] Undesirable result number six is defined as "depletions of interconnected surface water that have significant and unreasonable adverse on beneficial uses of the surface water."[24] Plans must include sustainable management criteria ("SMCs") for undesirable results along with sufficiently concrete timelines and commitments for projects and management actions to demonstrate the sustainability goal is likely to be achieved and maintained throughout the planning and implementation horizon.[25] The GSPs' decisions must be supported by the best available science,[26] and SMCs and projects and management actions must be commensurate with the level of understanding of the basin setting.[27]

California's Reasonable Use Doctrine requires the SVBGSA to protect water resources and balance competing beneficial uses consistent with public interest. This doctrine is enshrined in SGMA.[28] Article X, section 2 requires "water resources of the State be put to beneficial use to the fullest extent of which they are capable, and the water or unreasonable method of use of water be prevented, and that the conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare." The Reasonable Use Doctrine is the principle governing all uses of water resources in California.[29] Section 100 of the Water Code further mandates "that the conservation of such water is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare."[30]

The SVBGSA also has an affirmative duty to take the public trust into account in the planning and allocation of water resources, and to protect public trust uses whenever feasible.[31] The SVBGSA must consider public trust resources as they relate to groundwater pumping impacts to surface water beneficial uses.

To summarize, the GSPs must first establish criteria, set out measures in sufficient detail to ensure sustainability according to the criteria, and then implement the plan. The SVBGSA

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[23] *See* 23 CCR 354.22; Cal. Water Code § 10721(u).
[24] *See* Cal. Water Code § 10721(x)(6).
[25] *See* 23 CFR 354.22 et seq.
[26] *See* Cal. Water Code § 100; 23 CCR § 355.4.
[27] 23 CCR § 350.4.
[28] Cal. Water Code § 10720.1.
[29] *Joslin v. Mann Municipal Water Dist.,* (1967) 67 Cal.2d. 132, 137-38.
[30] Cal. Water Code § 100.
[31] *National Audubon Society v. Superior Court* (1983) 33 Cal.3d. 419, 446 (1983).

must be guided by the Public Trust and Reasonable Use doctrines, especially given the significant interaction between surface water and groundwater in the Salinas Valley. These doctrines are guideposts for developing the SMCs.[32] The GSPs must undertake an analysis of the impacts to public trust resources and ensure the reasonable use of water. Any consideration of reasonableness must include analysis of the costs to public trust resources and the reasonableness of the loss of fish populations, for example. Ecological beneficial uses of the Salinas River are essential to meeting the success and viability of the South Central Southern California Steelhead.[33]

B. <u>The Sustainable Management Criteria for Depletion of Interconnected Surface Waters Fail to Adequately Consider Impacts to Ecological Beneficial Uses Including Habitat for Steelhead Trout.</u>

Prevention of Undesirable Result Number Six requires the SVBGSA to develop SMCs considering all impacts beneficial uses of surface water including Steelhead habitat. The overarching legal doctrine of reasonable use and public trust provide boundaries governing beneficial uses of surface water, and inform the analysis of what constitute "significant and unreasonable adverse impacts" on beneficial uses of the surface water as a result of these depletions under SGMA.

Groundwater pumping will impact surface waters and have an adverse impact on fish and wildlife. Yet the GSPs fail to provide any analysis of the impacts to public trust resources, the first step in the process to satisfy the public trust doctrine.[34] The SVBGSA has not acknowledged, let alone provided any analysis of the damage to Steelhead Trout habitat that will be caused under the proposed SMCs. This failure also violates the Reasonable Use Doctrine.

I. Reliance on the 2007 Biological Opinion Does Not Fulfill the SVBGSA's duties under SGMA, the Public Trust Doctrine, or the Reasonable Use Doctrine.

The SVBGSA has been repeatedly alerted to the damage being caused under the Biological Opinion and Incidental Take Statement for the Salinas Valley Water Project ("2007 Biological Opinion"),[35] and it should not be used to develop SMCs for the preventing of undesirable results related to the depletion of interconnected surface water. The GSPs fail to consider the impacts on Steelhead populations in particular. Steelhead are of particular importance because of their protected status, and their value as an indicator species for the health and sustainability of Salinas River management. Stakeholders, The National Marine Fisheries Service ("NMFS") in particular, have pressed the SVBGSA for changes due to concerns about

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[32] Belin, A., Guide to Compliance With California's Sustainable Groundwater Management Act: How to avoid the "undesirable result" of "significant and unreasonable adverse impacts on beneficial uses of surface waters" (2018) (available at https://stacks.stanford.edu/file/druid:kx058kk6484/Woods%20Groundwater%20Mgmt%20Act%20Report%20v06%20WEB.pdf).

[33] *See* NMFS Comment on UVA (May 7, 2021) Appendix A (Role of Salinas River in Meeting NMFS' South-Central California Coast Steelhead Viability/Recovery Criteria.**)**

[34] *National Audubon Society v. Superior Court* (1983) 33 Cal.3d. 419, 426.

[35] June 21, 2007.

the failure of the SMCs to undertake a meaningful analysis of impacts to ecological beneficial uses, including for Steelhead Trout habitat. The status quo management strategy under the withdrawn 2007 Biological Opinion does not adequately support ecological beneficial uses and constitutes an unauthorized take of steelhead trout under federal law.[36] This amounts to a violation of both the Reasonable Use Doctrine and Public Trust Doctrine. The GSPs, including projects and management actions that depend on the establishment of valid SMCs, must be revised accordingly.

The GSA has not interrogated the question of how recreational and ecological uses, including flows for Steelhead, are impacted under recent activities managing groundwater. NMFS has commented extensively throughout proceedings on the 180/400 and the proceedings on the remaining GSPs, explaining that the current regime does not protect ecological beneficial uses. Importantly, NMFS has explained that implementation of the withdrawn 2007 Biological Opinion should not be relied on by the GSA as evidence that the current regime supports ecological beneficial uses.

The 2007 Biological Opinion was withdrawn because it did not adequately protect Steelhead and was not protective of public trust resources. For example, the Biological Opinion assumed precipitation would follow historical wet and dry year patterns,[37] and the Salinas Valley Water Project would operate as planned. Neither assumption has proved correct, however. California has experienced severe, multi-year droughts that began after NMFS issued the Biological Opinion in 2007. The Flow Prescription only contemplated water releases from the Nacimiento and San Antonio Reservoirs for steelhead flows in the Salinas River when combined water storage is above 150,000 acre-feet for smolt outmigration or 220,000 acre-feet for adult upstream migration and juvenile passage to the lagoon. The Flow Prescription does allow for 2 cfs of flow to the lagoon during dry years where flows for migration are not triggered. Due to the droughts, reservoir storage capacity has not exceeded the migration-flow trigger levels, relieving Monterey County Water Resources Agency from any obligation to provide conservation releases. Due to declining reservoir storage and low rainfall, fish passage has been impossible, effectively precluding steelhead reproduction. As a result, steelhead trout receive essentially no conservation flow benefit from the Biological Opinion that was crafted with the object of protecting the species.

Since the Biological Opinion was withdrawn, federal and state agencies have made clear that the flow regime it proposed was inadequate and must be updated.[38] The SVBGSA has not explained how it can rely on a withdrawn Biological Opinion and comply with SGMA's mandate to use the best available science and information. The SVBGSA maintains that it can wait for a revised flow regime in a yet-to-be developed Habitat Conservation Plan. Meanwhile The

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[36] "Unauthorized take" is defined as "to harass, harm pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." 16 U.S.C. § 1532(19).
[37] *See, e.g.*, 2007 Biological Opinion, p. 12-13.
[38] *See* South-Central California Coast Steelhead Recovery Plan, National Marine Fisheries Service, West Coast Region, California Coastal Area Office, Long Beach, California (2013) (explaining the failures).

California Department of Fish and Game advise conservatism in such situations, where impacts of groundwater-surface water dynamics are either unknown or in the process of being analyzed.[39]

The Biological Opinion does not support ecological beneficial uses, and the SVBGSA has not explained how reliance on it to establish SMCs will protect ecological beneficial uses, protect public trust resources, and reasonably balance beneficial uses of water. NMFS has commented that the using the proposed SMCs are "likely a take," explaining:

> Given that 2015 pumping levels, and the corresponding impact of surface water depletion on beneficial uses, were likely some of the highest on record due to California's historic drought, preventing those impacts from worsening in the future is hardly a "benefit" to ecological users of surface water, and akin to ensuring a dry river channel doesn't get any drier.[40]

The fact that implementation of the proposed SMCs will cause a take to occurr, in and of itself, constitutes a "red light" scenario under Undesirable Result Number Six, and requires remedial steps by the SVBGSA.[41] The SVBGSA has responded to NMFS concerns, not by changing the substance of the GSPs to better protect ecological uses with meaningful action, but merely by explaining the intent to wait for a new Habitat Conservation Plan to establish a new flow regime that will be protective. This strategy does not analyze, much less incorporate the best information or science as required under SGMA. Neither has the SVBGSA provided any discussion or support for how waiting for a new Habitat Conservation Plan, a process completely outside the control of the SVBGSA, satisfies its duties to safeguard public trust resources and ensure the reasonable use of water.

The fact that the current flow regime is inadequate to support ecological beneficial uses has consequences for the GSPs' water budgets as well. The GSPs must consider the best available information and science in establishing the water budget.[42] The GSPs use of the withdrawn Biological Opinion does not satisfy the SVBGSA's duty to use the best available information and science for the purpose of water budgeting.

II. The Use of Groundwater Levels as a Proxy for Interconnected Surface Water Sustainable Management Criteria is Not Adequately Supported.

Under SGMA, the use of groundwater levels as a proxy in the depletion of interconnected surface water SMCs requires that a "significant correlation exists between groundwater elevations" and undesirable surface water depletion impacts they are designed to measure.[43] However, the GSPs do not establish a significant correlation, ignoring significant and

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[39] Fish & Wildlife Groundwater Planning Considerations. California Department of Fish and Wildlife, Groundwater Program. California Department of Fish and Wildlife (2019) p. 14 (available at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=170185&inline)

[40] NMFS Comment to Upper Valley Aquifer GSA, May 7, 2021.

[41] Belin, A., Guide to Compliance With California's Sustainable Groundwater Management Act: How to avoid the "undesirable result" of "significant and unreasonable adverse impacts on beneficial uses of surface waters" (2018).

[42] 23 CCR § 354.18(e).

[43] 23 CCR § 354.36(b).

unreasonable impacts to Steelhead, and by proxy, to the ecological health of the Salinas Basin, that are accruing under the current and projected future levels of groundwater pumping. These local circumstances, including the most relevant and current facts and impacts on recreational and ecological resources must be analyzed to establish any significant correlation. Simply citing to a 2018 Environmental Defense Fund guidance, as the SVBGSA has done, is not adequate to establish the proxy relationship. In fact, that guidance makes clear that local conditions and circumstances must be analyzed, and does not suggest that groundwater levels should be used as a proxy without such analyses.[44]

The SMCs must be reevaluated in light of the body of evidence that ecological and recreational beneficial uses are not adequately being protected. SGMA requires this information be included in the analysis of significant and unreasonable adverse impacts on beneficial uses of surface water. Despite the requirements of the Public Trust and Reasonable Use doctrines, the GSPs fail to use reasonable means available under its authority to analyze, much less limit unreasonable impacts to surface water beneficial uses and public trust resources. The SVBGSA must, as a starting point, acknowledge what those impacts are. Then the SVBGSA must determine the implications for sustainable groundwater management in the Salinas Valley.

C. Projects and Management Actions for Preventing Undesirable Result Number Six Are Not Supported by the Best Available Science.

Projects and management actions to address depletion of interconnected surface waters must consider the best available science.[45] The GSA must support its conclusions with substantial evidence after applying the best science that is available now. As explained above, the proposed SMCs, which are supposedly designed to protect against undesirable result number six, depletion of interconnected surface waters, rely on outdated findings from the 2007 Biological Opinion that has been retracted, and ignore more recent data and information. The GSP ignores ample evidence that has been submitted to the SVBGSA demonstrating the need for increased flows to support ecological beneficial uses. Relying on the Biological Opinion’s flow regime while ignoring the reasons it was withdrawn and supplemental information violates SGMA regulations requiring the best available science and information support decisions in plans.

D. The GSPs Do Not Include Reasonable Steps to Develop Protective Sustainable Management Criteria, Projects, and Management Actions.

As with other SMCs, SGMA’s mandate that the GSPs address depletion of interconnected surface waters requires that management actions the GSPs proposes are reasonable and supported by the best available science. In addition, the Public Trust places an affirmative duty on the SVBGSA to consider public trust resources and protect them “whenever

[44] *See* Hall, M., Babbitt, C., Environmental Defense Fund, Addressing Regional Surface Water Depletions in California, A proposed approach for compliance with SGMA (2018) p. 7 (available at https://www.edf.org/sites/default/files/documents/edf_california_sgma_surface_water.pdf).
[45] 23 CCR § 354.44(c).

feasible,"[46] and the Reasonable Use Doctrine requires that GSPs provide for "the greatest number of beneficial uses which the supply can yield."[47]

The SVBGSA's plan to "continue to coordinate with NMFS on the effect of pumping on interconnected surface water and steelhead trout" falls well short of these standards. The GSPs must set forth concrete steps that will be taken to establish legally sufficient SMCs, including impacts to Public Trust resources. SGMA requires corresponding projects and management actions, sufficient to support the determination by the SVBGSA that the sustainability goal will be met, be included in the GSP, and then implemented. The SVBGSA must separately demonstrate that it has fulfilled its duties under the Reasonable Use and Public Trust doctrines. Indeed, an attempt to avoid or minimize the harm to public trust uses is the second step required by the Public Trust Doctrine.[48]

5. Sustainable Management Criteria and Management Actions Related to Water Quality Violate SGMA.

The GSPs must analyze how groundwater conditions impact and degrade water quality. While the SVBGSA may not be the only agency with some responsibility over groundwater quality, the fact that other agencies including the County and the Regional Water Quality Board have authority and responsibility to address water quality degradation does not relieve the SVBGSA from its duty to ensure groundwater conditions in the basin do not create undesirable results. DWR rejected the SVBGSA's narrow interpretation of its responsibility to protect against water degradation.[49] The fact that multiple other agencies share responsibility demonstrates that the statutory scheme does not intend to rely on the regulatory actions of any single agency.

SGMA requires the GSPs to address degradation of water quality that accrues after January 1, 2015.[50] SGMA states that a plan "may, but is not required to, address undesirable results that occurred before, and have not been corrected by, January 1, 2015." Thus, the GSPs must address all worsening water quality that results from groundwater use, including instances where water quality may have already violated maximum contaminant levels in 2015.

Nothing in SGMA's mandate that the GSPs address water quality degradation permits the SVBGSA to ignore water quality degradation that results from third party pumping. The GSPs must address the effects of its regulatory acts, and its failures to act.[51]

The State Water Resources Board identified the importance of the SVBGSA sorting out its responsibilities vis-à-vis other agencies in 2020:

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[46] *National Audubon Society v. Superior Court* (1983) 33 Cal.3d. 419, 446.
[47] *Peabody v. City of Vallejo*, 2 Cal. 3d 351, 368 (1935).
[48] *National Audubon Society v. Superior Court* (1983) 33 Cal.3d. 419, 426.
[49] DWR GSP Assessment Staff Report, Salinas Valley – 180/400 Foot Aquifer (June 3, 2021) p. 27.
[50] Cal. Water Code §§10727.2(b)(4); 10721(x)(4).
[51] *See, e.g.,* Cal. Water Code § 10721(u) (explaining that the plans must achieve the sustainability goal by identifying and causing the implementation of projects and management actions).

> The GSP states that only water quality impacts caused by GSP implementation are unacceptable but does not explain how SGMA-related water quality changes will be distinguished from other water quality changes. The GSP should outline the process the GSAs would use to decide whether or not an exceedance of an MT for water quality degradation was caused by GSP implementation; otherwise, it is difficult to judge how adequately the GSP addresses undesirable results related to water quality degradation. Staff recommends that the GSAs consult with the Central Coast Water Board in developing this process.[52]

Not only does the SVBGSA have responsibility to consider water quality impacts, but the GSPs must also put in place concrete plans for determining which agency will take responsibility under which circumstances, to ensure that water quality issues are dealt with. The State Water Board and DWR have identified the importance of consulting with the Central Coast Water Board to ensure responsibilities are understood and water quality is adequately protected.[53]

The proposed "Water Quality Partnership" project and/or management action in the GSPs[54] does not satisfy SGMA's requirement that he SVBGSA provide findings determining the project and management actions will achieve the sustainability goal,[55] nor do the GSPs include required descriptions of circumstances under which the partnership will be implemented, criteria triggering implementation,[56] time-tables for initiation and completion,[57] or an explanation of how the project or management action will be accomplished. The GSPs must identify and *cause* the implementation of the Water Quality Partnership actions.[58] Providing these details is a critical and required component for demonstrating the GSPs are likely to meet the sustainability goal, as the SVBGSA is required to do.

The Water Quality Partnership needs to be revised to be an effective, enforceable commitment to action by the agencies with the most direct oversight of the cause of any exceedance. At minimum, a management action that addresses water quality degradation should include the following specific details, which should be negotiated and memorialized in a memorandum of understanding ("MOU") to include the SVBGSA, the Regional Water Quality Board, and the Monterey County Department of Environmental Health:

- The agencies must monitor a sufficiently representative sampling of domestic wells to reliably determine any instance of a domestic well's failure to meet water quality standards;
- An approach to reach agreement between the agencies, for each instance of failure to meet the measurable threshold for water quality, about whether the cause includes (1)

[52] State Water Resources Board letter to Craig Altare, Supervising Geologist, SGMA Office, Department of Water Resources, 180/400 Foot Aquifer Groundwater Sustainability Plan, Groundwater Subbasin No. 3-004.01(December 8, 2020), p. 3.
[53] *Id*; DWR GSP Assessment Staff Report, Salinas Valley – 180/400 Foot Aquifer (June 3, 2021), p. 27.
[54] *See, e.g.*, Eastside Aquifer Plan, pp. 9-100 - 9-101.
[55] 23 CCR § 354.44(a).
[56] 23 CCR § 354.44(b)(1)(A).
[57] 23 CCR §354.44(b)(4).
[58] Cal. Water Code § 10721(u) (emphasis added).

discharge of pollutants and/or (2) pumping activity that has concentrated, mobilized, or moved pollutants. Each instance, there must be public oversight and clear system of accountability for the agency/agencies that are assigned responsibility;

- Where the cause includes pumping activity, the SVBGSA should take action to abate the pumping that is causing the failure to meet water quality standards;

- Adequate funding for all aspects of the project, including financial support for outreach to underrepresented communities;

- Unless and until the Water Quality Partnership approach results in an improvement in the water quality for the impacted well immediately after reporting, the minimum threshold should be set at 75% of the relevant maximum contaminant level to adequately protect public health.

In addition, the MOU for the Water Quality Partnership should be finalized in a timely manner. Further, the agencies should report out to the public on those meetings regularly and the GSPs should establish a concrete timeline for when the respective requirements of the MOU will be complete, and consequences if the timelines are not met.

Lastly, we voice our agreement with the voluminous comments Community Water Center has provided to the SVBGSA on water quality impacts for disadvantaged communities in particular. We implore the SVBGSA to give attention to the robust and detailed contribution of Community Water Center staff on the GSPs.

6. The SVBGSA Should Take Meaningful Steps to Improve Representation of Underrepresented Communities

The SVBGSA must take meaningful steps to remedy the disparity of representation with the SVBGSA and its board, as required by SGMA[59] and to ensure consistency with California's Human Right to Water Law.[60]

The GSPs' discussion of Underrepresented Communities acknowledges that they "have little or no representation in water management and have often been disproportionately less represented in public policy decision making."[61] However, the SVBGSA makes no meaningful commitment to remedy this issue. The GSPs should identify funding for these projects, and provide specifics as to exactly how these plans will be executed. The GSPs should explain what metrics they will use to evaluate and demonstrate the increased "representation" for underrepresented communities. The GSPs should attach specific timelines to these metrics, and also describe binding consequences that will be triggered if the SVBGSA fails to meet its goals.

In addition, to increase the representation of underrepresented communities, we implore the SVBGSA to incorporate the suggestions and direction of organizations such as Community Water Center, an organization that has dedicated significant resources to the ongoing creation of

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[59] Cal. Water Code § 10723.2 (expressly requiring SVBGSA to consider interests of all beneficial users).
[60] Cal. Water Code § 106.3.
[61] *E.g.,* Upper Valley Aquifer Subbasin plan, p. 10-8.

SVBGSA GSPs and which has an express mission to represent underrepresented communities on the Central Coast.

Lastly, there is a systemic flaw that underlies the SVBGSA creation of its plans and will surely plague the implementation until it is resolved: the structural over-representation of agricultural interests in decision making for the SVBGSA. In addition to strong agricultural interests intrinsic to seats appointed by municipalities and the County of Monterey, four seats of the eleven-seat board are allocated to "agricultural interests." A super majority of three of those four agricultural votes are required for the most consequential decisions including to impose certain fees and impose pumping limits. To increase "representation" of underrepresented communities who often bear the burdens of unsustainable groundwater use, the SVBGSA should increase the representation of non-agricultural beneficial users, especially underrepresented communities, on the SVBGSA board to allow interests of these other beneficial users to meaningfully participate in decision making. Funding should be set aside for seats designated for underrepresented communities to ensure the seats are accessible for those with limited resources.

Thank you for your consideration, and we look forward to ongoing work with the SVBGSA to ensure our shared groundwater resources are managed sustainably.

Sincerely,

Tyler Sullivan, Staff Attorney
Drevet Hunt, Legal Director
California Coastkeeper Alliance

Sean Bothwell, Board Member
Monterey Waterkeeper

Copy via email to:
Donna Meyers, General Manager, meyersd@svbgsa.org
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BRENT BUCHE
GENERAL MANAGER

STREET ADDRESS
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October 15, 2021

Donna Meyers, General Manager
Salinas Valley Basin Groundwater Sustainability Agency
1441 Schilling Place
Salinas, CA 93901

Re: Draft Eastside Aquifer Subbasin Groundwater Sustainability Plan

Dear Ms. Meyers:

Monterey County Water Resources Agency (Agency) appreciates the opportunity to comment on the draft Eastside Aquifer Subbasin Groundwater Sustainability Plan (GSP). As you know, Agency staff has been involved in reviewing this GSP in a technical role to assure that the data collected and curated by the Agency is utilized and described in an accurate manner.

What the Agency has been unable to do is to review most of management actions and projects in this document for feasibility and to verify the claims of benefits to groundwater sustainability. The management actions and projects that involve modifying many of the Agency's operations, projects, programs and/or permits have not been vetted by the Agency to ensure that Agency's goals and objectives will continue to be met if implemented. This document does not contain enough detail for an in-depth review which would be required before the Agency could provide support for these activities. Therefore, the Agency considers most of these management actions and projects as conceptual ideas that provide the Salinas Valley Groundwater Basin Sustainability Agency (SVGBSA) with a menu of options to move forward in this planning phase. What moves forward to implementation has yet to be decided. The Agency understands that feasibility studies will be conducted by the SVBGSA before any considerations for implementation of management actions or projects that utilize Agency facilities, operations or permits will proceed. Coordination and discussions between the Agency and SVBGSA are pertinent to this being successful.

SVGBSA staff has characterized this GSP as a starter document that will be revised in an iterative process and does not commit the Agency to any specific actions. The Agency looks forward to those revisions and updates that contain feasibility studies for the management actions and programs that include a complete project description that outlines specific tasks, identifies the benefits to the entire Salinas Valley Groundwater Basin and determines costs along with a sustainable funding mechanism for implementation.

MCWRA staff has reviewed the draft GSP, except for Chapter 9 – Projects & Management Actions, released by the SVGBSA on August 18, 2021 and provide the following comments for consideration:

Chapter 1, Section 1.1, page 1-1, paragraph 3: "With limited recharge and increased groundwater extraction…". Total groundwater extractions, as reported to MCWRA have fluctuated since 2011, with a peak in 2015, but annual extractions from 2018-2020 were equal to or less than extractions in 2011. This does not seem to support the statement that groundwater extractions have increased in the Eastside. Even as far back as 1995, groundwater extractions from the Eastside were within 1,000 acre-feet of the 2020 annual extraction total.

Chapter 2, Section 2.2, page 2-2, last bullet: Correct "Resource" to "Resources" in listing Monterey County Water Resources Agency.

Chapter 2, Section 2.4, page 2-7: Figure 2-2 is a duplicate of Figure 2-1.

Section 4.4.5.1, page 4-23: The discussion on interconnected surface water references results from the preliminary SVIHM (also depicted in Figure 4-9) but the USGS disclaimer about model results does not appear prior to this in the report. The disclaimer is included in Volume 2 (page 6-1) but it may be useful to include it sooner, if data from the SVIHM is referenced.

Section 4.6.2, page 4-35: Consider mentioning in this section that seawater intrusion is currently defined in MCWRA Ordinance 3790 as 500 mg/L chloride (there is a specific definition in the ordinance). This section mentions the "500 mg/L isocontour" but does not explicitly state which constituent is being referenced or the significance of the 500 mg/L threshold.

Volume 2

Section 6.1, page 6-1, paragraph 4: The watershed model in the SVIHM is referred to as the Salinas Valley Watershed Model (SVWM). It uses the HSPF code, in the same way that the SVIHM uses the MODFLOW-OWHM code, but it is known as the SVWM.

MCWRA appreciates the opportunity to comment on the draft GSP for the Eastside Subbasin. If you have any questions regarding the enclosed comments, please contact MCWRA at 831-755-4860.

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Sincerely,

Elizabeth Krafft
Deputy General Manager

Number	Chapter	Date	Commenter	Comment	Response	Action
1	4	6/5/2020	Ross Clark, Central Coast Wetlands Group (CCWG)	See attached letter.	Received	Chapter 9 recognizes the potential benefits of and incorporates multi-benefit projects, and the need to look at surface water management and infiltration together. References to partner agencies and organizations have been added throughout the GSP. 1) Figure 4-8 shows areas of good recharge; however, it is important to note in the GSP that recahrge may be limited by the intermittent clay lenses that can be found within the Eastside Aquifer. Clay lenses in the the Eastside Aquifer can be significant like those that divide the shallow and deep zones of the aquifer. 2) As mentioned above, references to parallel efforts by other agencies and organizations were added throughout the GSP. 3) The recharge potential in the Eastside Subbasin is discussed in Chapter 4 and the poor recharge zones along the Gabilan Range are highlighted in Figure 4-8. The effect of channelization of Gabilan Creek on infiltration and groundwater pumping is noted. 4) Planning efforts of partner agencies and stakeholder groups were recognized throughout the GSP. SVBGSA's jurisdiction may be limited in certain aspects of groundwater managment, like owning land and changing land use, but it will work with agenices and stakeholder that have such abilities if necessary. For example, SVBGSA will continue to work with MCWRA who collects data for the monitoring wells in the Eastside Subbasin's groundwater elevation monitoring network as discussed in Chapter 7. 5) Projects that discuss surface water management and groundwater infiltration are discussed in Chapter 9.
2	3	7/10/2020	Heather Lukacs, Community Water Center	See attached letter.	Received	Comment about plan area description: - 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. Comment about water system maps: - 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. 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. 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.

Number	Chapter	Date	Commenter	Comment	Response	Action
3	5 and 7	10/16/2020	Diane Kukol, Central Coast Water Board	See attached letter.	Received	Chapter 5: The water quality analysis was redone for V2 to include both current and historic groundwater quality data, and arsenic is now a constituent of concern in the Eastside Subbasin. Section 5.4.3 and 5.4.4 text was also revised to provide more specificity about the constituents and wells sampled. Chapter 7: Section 7.5 text was revised to specify that the groundwater quality monitoring network is dependent on the existing samping and well density of the ILRP and DDW monitoring programs. Chapter 5 and 8 text include the constituents of concern that will be monitored in each type of well. SGMA Regulations only require "spatial and temporal coverage." Furthermore, the vertical coverage of the monitoring system cannot be further determined because ILRP well data do not include well depths or screen intervals, which would make it difficult to map vertical water quality.
4	9	10/30/2020	Chris Bunn	See attached letter.	Received (sent to DW on 10/30)	These topics were discussed in the Subbasin Committee and further investigation could be considered during GSP implementation.
5	9	11/6/2020	Ross Clark, Central Coast Wetlands Group (CCWG)	See attached letter.	Received	Your input on potential projects and management actions has been taken into consideration in the scoping of projects and management actions brought to the Subbasin Committee and included in the GSP.
6	9	11/11/2020	Chris Bunn	See attached letter.	Received (sent to DW on 11/11)	Noted, CSIP expansion is on the list of potential projects for the Subbasin.
7	General concern all subbasins	3/10/2021	George Fontes, Salinas Basin Water Alliance (SBWA)	See attached letter.	Received	Concerns about the effect of water budget calculations on farming have been noted and will be considered. 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. 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.
8	1-5 & 7	3/12/2021	MCWRA	See attached letter.	Received	Chapter 3: Section 3.4.3 and 3.6.6 comments were noted and text was revised. Chapter 5: Section 5.1.3 comment was noted, clarifying text that refers to Chapter 7 for more information was added. Chapter 7, Section 7.3.2 and 7.9 comments were noted and text was revised to address them.
9	9	4/20/2021	James Sang	See letter attached.	Received	Thank you for your input. Decentralized methods of groundwater recharge such as swales can be included in Agricultural BMPs.
10	7	4/21/2021	George Fontes, Salinas Basin Water Alliance	See letter attached.	Received	Noted. SVBGSA will work with MCWRA to determine the best way to improve the collection of groundwater pumping data in the Salinas Valley. The projects and management actions are modeled for the whole Salinas Valley to see how actions in one subbasin will affect neighboring subbasins. The current GEMS data is the best available data and thus the data that is used to inform water budgets and projects and management actions.

Number	Chapter	Date	Commenter	Comment	Response	Action
11	1 to 5, 7, and 8	4/23/2021	Heather Lukacs, Community Water Center & Horacio Amezquita, San Jerardo Cooperative, Inc	See letter attached.	Received	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. 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. Chapter 5: - 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 corrleation 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 occured 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. 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. Chapter 7: - 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 aovid any overlap in monitroing 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. Chapter 8: - 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.

Number	Chapter	Date	Commenter	Comment	Response	Action
12	9	4/28/2021	Community Water Center	See letter attached.	Received	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. 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.
13	8	5/12/2021	Heather Billing, Provost and Pritchard	See attached JotForm submission.	Received	The actions taken to address minuimum theshold exceedances will be discussed in annual reports and this is also where progress towards SMC will be evaluated. As part of the SVBGSA's ongoing outreach plan, the SVBGSA will meet annually with RWQCB to review groundwater quality data. During these reviews, changes in groundwater quality will be assessed and potential causes of these changes will be discussed, including from either projects or pumping. Additionally, SVBGSA will be proactive with setting up robust monitoring systems around any GSA projects which will indicate if SVBGSA activities are resulting in groundwater quality changes.
14		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		5/13/2021	Fred Nolan	See letter attached.		We have scoped recycled water projects in subbasins where there is a sufficient quantity of available source water. We will continue to monitor future oppurtunities to use recycled water.

Number	Chapter	Date	Commenter	Comment	Response	Action
16	2, 9, and 10	6/17/2021	Heather Lukacs, Community Water Center & Horacio Amezquita, San Jerardo Cooperative, Inc	See letter attached.	Received	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. Chapter 9: - 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. Chapter 10: - 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 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. - 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"

Number	Chapter	Date	Commenter	Comment	Response	Action
17	9	7/6/2021	Comprehensive River Management	See 125 letters attached.	Received	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.
18	9	7/20/2021	James Sang	See letter attached.	Received	The Eastside Subbasin is an example of both the complexity of groundwater, as well as the importance of managing as a whole. The Eastside Subbasin is characterized by a series of interconnected alluvial fans, which are a mix of sands, gravels, and clays deposited over time. The groundwater encountered in alluvial fans may present as a series of suspended aquifers, or one aquifer with intermittent and discontinuous aquitards interspersed with the water-bearing sediments. While this may give the appearance of wells drawing water from different sources, these wells are in fact drawing water from different places in the same source. Additionally, many man-made impacts on the groundwater alters the water table, sometimes in uneven ways, thereby exacerbating the appearance of potentially different water sources, such as the cone of depression near Salinas, where pumping over time has created a depression in the water table. The two wells pointed out are in different locations, and as such are not in different groundwater sources, rather they are in differently deposited and human-impacted places in the same source. Infiltration and recharge to get water from the surface to the aquifer are complex mechanisms and not easily managed for a whole basin. Rainwater has the opportunity to infiltrate the soil at many places at the land surface, however this infiltrated water does not always readily translate into direct recharge to the aquifer. Water can be intercepted in the form of soil evaporation, plant roots, or clay layers, sending the water back up to the atmosphere or horizontally. At a basin-wide scale, recharge from precipitation travels more horizontally than downward because of how the sediments are layered. Additionally, water flowing in the subsurface flows significantly slower than at the surface, and may take many years or decades to reach portions of the aquifer that have been heavily impacted by human activity. Thanks for your recommendation for capturing more rainwater in the soil, and this specific conservation method may be readily incorporated into the GSP projects of Managed Aquifer Recharge of Overland Flow, Floodplain Enhancement and Recharge, Conservation and Agricultural BMPs, and the Eastside Implementation Action of Support Protection of Areas of High Recharge. Projects and management actions are intended to help raise groundwater levels. The surface water diversion projects are also important to the overall groundwater management because they provide important in-lieu recharge benefits by providing alternative water to groundwater pumping, as well as important direct recharge opportunities. With regards to the Deep Aquifers; multiple stakeholders, public figures, and managing agencies are currently hard at work to determine the best way to define and manage these important water-bearing units. The upcoming Deep Aquifers Study is to provide some answer that may address uncertainties and help manage the Aquifers.
Comments above were received prior to the full public release of the GSP. Several comments led to revisions in the chapters. Comments from here on are on the public review version of the GSP.						
19	Whole GSP	8/12/2021	Nancy Isakson, Salinas Valley Water Coalition Board	See letter attached.	Received	SVBGSA is convening a 180/400-Foot GSP Subbasin committee to discuss implementation. The content of the Integrated Plan is still under development, but is not currently anticipated to include management actions and projects. The SVIHM is the best available tool to determine water budgets at this time, and future results will be used to update the GSPs when available. The paragraph regarding the development of projects and management actions for the 180/400-Foot Aquifer Subbasin GSP has been deleted. The support for the 11043 permit and seawater intrusion barrier projects is noted.
20	Whole GSP	8/12/2021	Stephanie Hastings, Salinas Basin Water Alliance (SBWA)	See letter attached.	Received	For now, all additional simulations and analysis of intersubbasin flow (beyond what's in the water budgets) will be considered by the integrated implementation committee after GSP submittal.
21	Whole GSP	10/8/2021	Norm Groot, Monterey County Farm Bureau	See letter attached.	Received	Thank you for your support and input. The Integrated Implementation Plan will be written to with the goal of achieving sustainability in the entire Salinas Valley Basin.

Number	Chapter	Date	Commenter	Comment	Response	Action
22	Whole GSP	10/14/2021	John Farrow, LandWatch	See letter attached.	Received	A1. While the 180/400 looked at projects and management actions that involved the whole Valley, the focus was on the 180/400. During subbasin committee meetings, members agreed that while any projects and management actions will be evaluated in a valley-wide light, only the plans that would primarily help that subbasin reach or maintain sustainability should be included in the plan. To ensure projects and management actions are selected and implemented in an integrated manner, SVBGSA established the Integrated Implementation Committee. While the subbasin GSPs were developed through subbasin planning committees, GSA staff and consultants ensured the projects and management actions, as well as the plans, are not in conflict with each other. Additional steps needs to be completed before projects, management actions, or the water charges framework move forward, and the text of this GSP has clarified that the use of the word "will" is reflective of what will occur if/when a project or management action moves forward. The 180/400 GSP nor DWR's review of it commit SVBGSA to anything in other subbasins. A2. Not all the subbasins need all the projects or management actions that are planned in other subbasins. The projects included in the Eastside, Langley, Forebay, Upper Valley, and Monterey GSPs are not dependent on the water charges framework for funding. They took a different approach and described all potential funding mechanisms due to the recognition that the appropriate funding mechanism varies according to the specific project. A4. The projects for the Eastside, Langley, and Monterey Subbasins were determined by the Subbasin Planning Committees. Each subbasin is unique and while there are some projects that are currently conceptualized as being multi-subbasin, the details are to be determined during GSP implementation. Project costs are still being refined but the GSP provides initially estimates. The Subbasin Implementation Committees and Integrated Implementation Committee will determine if any of these projects will be used to achieve or maintain sustainability and will subsequently refine the scoping, costs, and funding approach. C. SGMA does not assume nor require that groundwater conditions in one basin have no impact on adjacent basins. Rather, SGMA requires a description of "how minimum thresholds have been selected to avoid causing undesirable results in adjacent basins or affecting the ability of adjacent basins to achieve sustainability goals." (354.28(b)(3)). The Eastside GSP does not dispute that its conditions affect adjacent subbasins; however, it does not prevent them from reaching sustainability. The GSPs set similar conditions for their groundwater level SMCs. Furthermore, the projects and management actions through which the 180/400 Subbasin plans to reach sustainability will not be inhibited by the Eastside GSP. The groundwater elevations SMC in the Eastside, while below sea level, are not necessarily the primary drivers of seawater intrusion in the 180/400-Foot Aquifer Subbasin. The aquifers are comprised of gravels, sands, and clays in various depositional facies based on their depositional environments. The sediment facies of the 180/400-Foot Aquifer Subbasin are of marine and river origin, and the sediment facies of the Eastside subbasin are of alluvial fan origin. Subsequently, there are noted impediments to groundwater flow as a result of sediment changes in the subsurface. For example, the Salinas Valley Aquitard generally prevents downward migration of water from the shallow sediments to the 180-Foot Aquifer. Similarly the alluvial fan clay facies, which generally demarcate the 180/400-Foot Aquifer Subbasin from the Eastside Subbasin, are reported to act as an impediment or obstacle to flow as well. This is noted in the 2004 Kennedy/Jenks report, as well as others. "It is unlikely that seawater will enter the transition area and the East Side any time soon based on the inferred rates of seawater advances and their less permeable aquifer properties" (Kennedy/Jenks, 2004). It can subsequently be inferred from this statement and report that the hydrologic conditions in the Eastside Subbasin have less influence on seawater intrusion than the historical extraction in the 180/400-Foot Aquifer Subbasin. The two subbasins will be a part of the Integrated Implementation Committee, which will evaluate the individual GSPs with a more refined lens of Basin connectivity and relationships. The GSPs acknowledge the connectivity within the Basin, and the Integrated Implementation Committee and Plan will expand upon these known relationships in order for the GSPs to work towards greater impact on managing groundwater sustainably. In the meantime, the SWIG has been meeting regularly to learn and strategize SWI mitigation approaches. This work will also serve to prevent adverse seawater intrusion impacts to the Eastside Subbasin from the 180/400-Foot Aquifer GSP. D. SVBGSA in coordination with legal counsel has developed improved water quality SMC language to be included in the final draft of the GSP, which notably includes regulation of groundwater extraction. This language is in response to DWR's comments about the water quality SMC language in the 180/400-Foot Aquifer Subbasin GSP. This GSP also includes the Water Quality Coordination Group (formerly Water Quality Partnership) to elaborate on how SVBGSA will work with other agencies responsible for aspects of water quality.

Number	Chapter	Date	Commenter	Comment	Response	Action
23	Whole GSP	10/15/2021	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, The Nature Conservancy, Union of Concerned Scientists, and Community Water Center	See letter attached.	Received	1. A. DACS and Drinking Water Users: Average domestic well depths were added to Section 3.3 and the populations of identified DACs were added to Figure 2-3 in Chapter 2. ISW: The approach taken in the GSPs to determine ISW locations relies on the accuracy of the model calibration to measured water levels and streamflows, while the recommended approach relies on manually contoured data based on measured water levels. Both approaches depend on available data and assumptions. The approach in the GSPs was used because it is based on simulation of the entire complex groundwater system and incorporates a temporal factor as well. Furthermore, the recommended approach will not provide depletion rates due to pumping through time. At best, it could provide snapshots between years when water level contours and pumping data are available, but it would be full of assumptions. I think the recommended approach is better suited for GSPs that do not have a numerical model tool. Regarding Figure 4-9, the ISW analysis applied a threshold of 50% of total months of the entire simulation period to represent approximate reaches with persistent connection with groundwater. No basinwide mapping of ISW locations in Salinas Valley existed in publicly available format prior to this analysis. Thus, this analysis provides an initial understanding of ISW locations throughout the basin. Assigning all cells with >0% connection as ISW could erroneously include isolated cells or reaches that might meet the threshold solely due to uncertainties within the model that caused water levels to be near land surface for a single or a few months over the entire 47-year simulation period. The GSP is not intended to manage those types of locations. Some reaches identified as having <50% connection could be identified in future GSP updates as being important ISW locations based on new information or results of future updates to the SVIHM. There are no data gaps in the ISW analysis; however, more perennial data is needed to improve calibration which in turn would improve the ISW analysis. This data could be amplified by the ISW monitoring network once it is fully developed including the proposed new wells. The monitoring network is set to measure shallow groundwater elevations near areas of interconnection that will be used to measure SMC. GDEs: The NC dataset only presents potential GDEs which are included in the GSP as potential GDEs. SVBGSA may consider field verifying these during GSP implementation. A higher depth-to-groundwater threshold may be considered if/when SVBGSA verifies that valley oaks are present. Text was added to re-emphasize that rooting depth data are limited. GSP Regulations do not require a complete list of fauna and flora in the Subbasin. 1. B. The Communication and Public Engagement Plan can be updated with more detail on the extensive outreach that has been carried out. When appropriate, DAC and environmental stakeholder feedback has been incorporated into the GSP - see responses to those comments. 1. C. DACS and Drinking Water Users: DACs are included in the GSP according to their water supply source, categorized according to the beneficial user types. The impact of chronic lowering of groundwater level minimum thresholds on domestic well analysis uses PLSS section location data. The reasons for the exclusion of wells are outlined in the GSP. Undesirable results are not defined in the GSP Regulations, but they are a quantitative description of the combination of minimum threshold exceedances that cause significant and unreasonable effects in the subbasin. Minimum thresholds are set at sites that "reflect general conditions in the Basin" (354.36(C). Regarding degraded water quality, Chapter 8 contains sufficient description of the minimum thresholds, measurable objectives, and undesirable results on "beneficial uses and users of groundwater or land uses and property interests" (354.28(b)(4), 354.26(b)(3)). Minimum thresholds and measurable objectives were developed by the Subbasin Planning Committee. Minimum thresholds and measurable objectives are based on Title 22 drinking water standards and Basin Plan irrigation water quality objectives. The Subbasin Planning Committees agreed to the minimum thresholds and measurable objectives. GDEs and ISW: The impacts on all beneficial uses and users were considered in establishing this SMC. What is significant and unreasonable is locally defined, balancing all uses and users. The effect of undesirable results on beneficial users are discussed in Section 8.11.4.3 of the GSP. 2. This GSP meets SGMA regulations with its use of DWR-recommended 2030 and 2070 climate scenarios for the future water budgets, including the base for the sustainable yield. Use of extremely wet and dry scenarios is not required. SVBGSA will reevaluate appropriate climate scenarios to use prior to the 5-year Update. Incorporation of climate change scenarios into project and management action benefits will be done as part of project feasibility and scoping for those selected to move forward. 3. The monitoring networks are to monitor groundwater conditions across the subbasin for all beneficial uses and users, not be prioritized for certain users. Additionally, monitoring networks were developed following DWR BMPs. Monitoring of shallow groundwater elevations near areas of interconnected surface water is sufficient to assess significant and unreasonable impacts to beneficial users. SGMA requires monitoring groundwater conditions that may impact beneficial uses and users, not monitoring the users themselves. The groundwater elevation and water quality monitoring networks are adequate and sufficient to monitor changing conditions in the principal aquifer. Monitoring networks do not need to cover every part of the Subbasin, the areas highlighted in Attachment E are represented by the current monitoring network. 4. The projects and management actions chosen by Subbasin Planning Committees are the ones that are included in the GSP. The GSA may consider this program in the future if it so chooses. Degradation of water quality due to GSA impact will be monitored as outlined in the GSP. As the GSP states, avoiding water quality impacts will be considered as part of project selection and design. Project-specific monitoring will be established as needed to ensure projects don't cause minimum thresholds to be exceeded. Recharge projects locations and site specifications have not been completely developed yet but this will be considered. Subbasin Planning Committees chose the management actions for each subbasin. The climate resilience of specific management actions will be considered during project selection and design.

Number	Chapter	Date	Commenter	Comment	Response	Action
24	Whole GSP	10/15/2021	Stephanie Hastings and Christopher R. Guillen on behalf of the Salinas Basin Water Alliance	See letter attached.	Received	I. SVBGSA replaced the Integrated Sustainability Plan for the the Integrated Implementation Plan. The Integrated Implementation Committee will outline the implementation of the 6 GSPs in the Salinas Valley Basin and address questions of groundwater relationship between the subbasins. This Committee will help ensure all subbasins get to sustainability. II. A. The SVIHM is the best avialable tool to compute water budgets for the subbasins in the Salinas Valley. The 180/400-Foot Aquifer Subbasin GSP will be updated using the SVIHM to be consistent with the rest of the subbains in the 2-Year Update currently underway. The SVIHM was used to develop water budgets for the Langley, Eastside, 180/400, Forebay, and Upper Valley using the same model simulations so that they would be consistent. The Monterey Subbasin used a different model due in part to poor calibration of the SVIHM in the Monterey Subbasin; however, it adopted boundary conditions from the SVIHM to increase compatibility and the Monterey Subbasin GSP includes an implementation action to integrate the Monterey Subbasin Model into the SVIHM when it is released. SVBGSA ran a no pumping scenario with the SVIHM to determine locations of surface water depletion due to pumping; however, it is a static model that does not shed light on how intersubbasin flow would have changed. It is a static dataset that reflects how reservoirs were actually operated, not how they would have been operated with no pumping. The Integrated Implementation Committee will consider the flow and relationship between subbasins early in 2022. II. B. 1. a & b. Sustainable yields were defined according to SGMA regulations. The water budgets measure inflows and outflows of the groundwater system, and both interbasin flow and groundwater extraction are accounted for. Minimum thresholds are meant to be prevented to avoid undesirable results. If each subbasin avoids their minimum thresholds, then neighboring subbasins will likely not be prevented from reaching or maintaining sustainability. The GSP does not dispute that its conditions affect adjacent subbasins; however, it does not prevent them from reaching sustainability. The sediment relationships between the 180/400-Foot Aquifer Subbasin, and the adjacent Langley/Eastside Subbasin demonstrate a dynamic environment where different sediments were deposited over time and subsequently, impact groundwater flow. The boundary with the Eastside Subbasin generally represents the furthest extents of the alluvial fans, which are characterized by clays and other fine sediments. These sediments frequently act as an impediment to flow, if not fully a barrier in certain locations. Subsequently, the gradient relationship is not the only influence to groundwater flow between the 180/400-Foot and Eastside Subbasins, and needs to be considered along with all subsurface characteristics. While there is a relationship between the groundwater contours developed for the 180/400 and Eastside Subbasins, the contours themselves are not fully representative of flow between the subbasins. As the model is further refined with additional and expanded data during Implementation, the SVBGSA and stakeholders will have a clearer view of the groundwater flow relationships, particularly as they relate to the recorded sediments in this area. The boundary with the Langley Subbasin was selected based on topographical changes, and the GSP fully acknowledges there is no hydrogeologic boundary that coincides with the administrative boundary. The key characteristic of the Langley Subbasin is the Aromas Sands, which are very permeable. Despite this connection and high permeability along with lowered groundwater elevations, the seawater intrusion front is not advancing in the direction of the Langley Subbasin. Subsequently, it would be premature to conclude that groundwater elevations in the Langley Subbasin are inducing or facilitating seawater intrusion in the 180/400-Foot Aquifer Subbasin. The groundwater flow relationship between the Langley and the Eastside Subbasins is largely uncharacterized as a result of a lack of data both about the sediment changes and the groundwater elevations in the area. This is a data gap that will be addressed during implementation. It is important to note that the 180/400-Foot Aquifer Subbasin GSP includes a plan in place to halt and reverse seawater intrusion and increase groundwater elevations, which will also serve to prevent adverse seawater intrusion impacts to the Eastside Subbasin. Both the Eastside Subbasin and the Langley Subbasin have developed projects and management actions to raise groundwater levels in their subbasins. The SMC were largely developed to be both achievable, as well as provide for operational flexibility during future droughts. Furthermore, these subbasins will be a part of the Integrated Implementation Plan, which will work to address seawater intrusion through a variety of strategies, which include increasing groundwater elevations. Additionally, the SWIG has been meeting regularly to learn and strategize projects to address seawater intrusion. The subbasins under the SVBGSA will be integrated during implementation, data acquisition, further data development, and coordinated stakeholder engagement. II. B. 1. c. Subbasin Planning Committees for each subbasin chose how they wanted to measure reduction in groundwater storage. The definition of storage for groundwater is expressly based on a change in pressure heads, or groundwater elevations, within an aquifer. Freeze and Cherry, in their seminal 1979 textbook Groundwater state, “The specific storage Ss of a saturated aquifer is defined as the volume of water that a unit volume of aquifer releases from storage under a unit decline in hydraulic head.” Hydraulic head is the sum of all pressures acting on water in the subsurface, which in unconfined aquifers, is generally summarized as elevation. Therefore, given the direct relationship between groundwater elevations and specific storage, groundwater elevations are appropriate as a proxy for storage. This is also explained in chapter 4.4.2 of the GSP, and a reference to that section has been added into Ch 8. Using the groundwater elevations as a proxy for storage is a reasonable alternative in Subbasins with less GEMS data available for estimating groundwater production. Additionally, the Langley, Eastside, Forebay, and Upper Valley Subbasins are characterized as having one principal aquifer, instead of multiple. This allows for the estimation of storage based on groundwater levels, since it is assumed that the groundwater is generally all connected in those Subbasins, and groundwater elevations are subsequently representative of groundwater conditions.

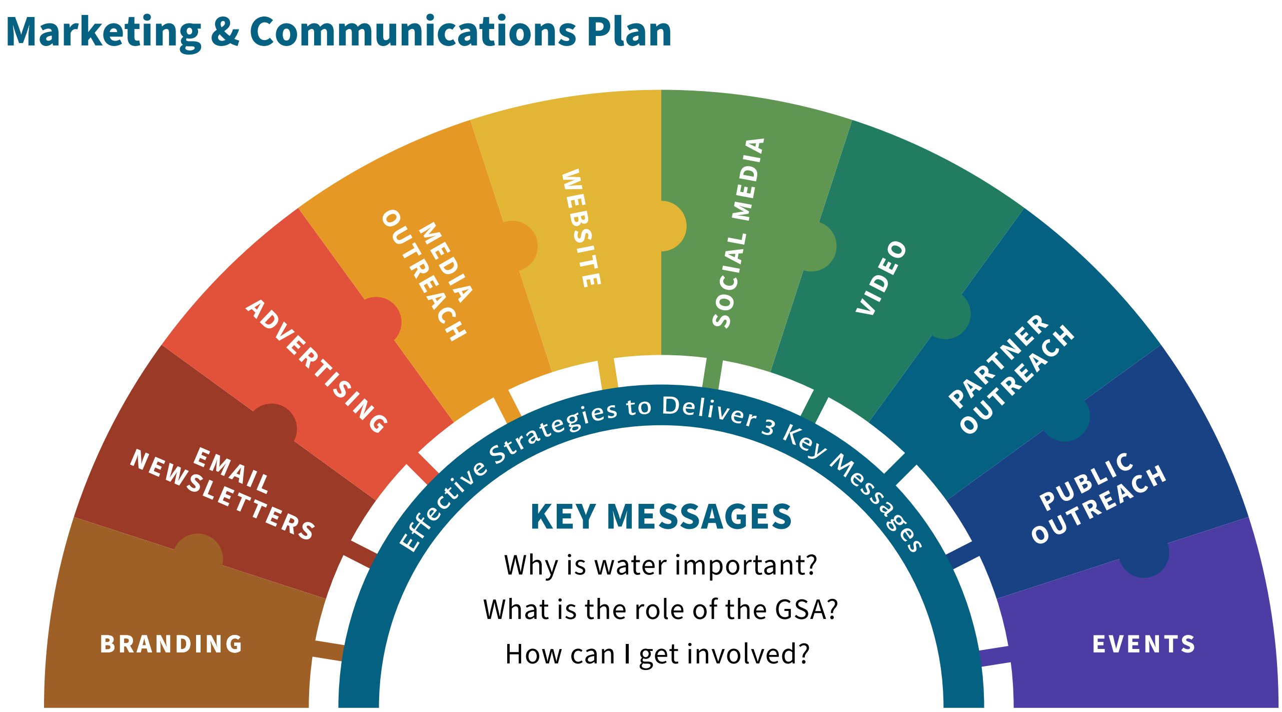
						Action (cont.)
						II. B. 2. A description of how minimum thresholds will affect adjacent subbasins were provided per GSP Regulations. The Forebay and Upper Valley Subbaisn Planning Committees defined how the SMC for all sustainability indicators in their subbasins will be measured. The SMC in the Forebay and Upper Valley are set at similar levels to the other subbasins and will not prevent adjacent subbasins from reaching sustainability. Text was added to clarify how the minimum thresholds were developed based on the significant and unreasonable statement and why they are not in conflict. II. B. 3. SVBGSA has considered the interest of all beneficial users in the Salinas Valley. The GSA does not "allocate the burden of sustainability" nor undertake any actions that threaten or impinge on water rights. III. Projects and managment actions were chosen by Subbasin Planning Committees, and are sufficient to maintain or achieve sustainability. the project mentioned was not brought up in any of the Subbasin Committee discussions on projects and management actions; however, the GSP does not preclude additional projects to be considered in the future. The Integrated Implementation Committee will determine which projects will be used to maintain or achieve sustainability in the Salinas Valley. Aquilogic Memo: The SVBGSA agrees that impacts on adjoining basins or subbasins must be addressed before implementing any management actions or projects. SVBGSA plans to conduct these analyses, which will include, among other things, updating the water budgets and sustainable management criteria in the 5-year updates if necessary, to account for inter-basin flows and impacts on adjoining basins or subbasins, when an appropriate tool becomes available. SVBGSA additionally agrees that the superposition approach included in the comment is a reasonable approach for addressing any action’s or project’s impact on inter-basin flows. This type of approach lessens the influence of model errors by addressing changes between simulations, and not absolute values in any simulation. SVBGSA will use this approach to address both intra and inter-basin impacts from any action or project. SVBGSA further agrees that the additional simulations proposed in the comment letter will facilitate a deeper understanding of the Salinas Valley Groundwater Basin, even though the additional simulations are not associated with specific actions or projects. To that end, SVBGSA staff will propose to the SVBGSA Board of Directors that the requested simulations would be informative, that these simulations be conducted before the next GSP assessment, and that the additional simulations will provide essential background understanding that will allow a thorough vetting of any potential management actions or projects. If and when approved by the SVBGSA Board of Directors, SVBGSA staff will work with all interested parties and stakeholders through the Integrated Implementation Committee to develop the assumptions and approaches for these simulations.

Number	Chapter	Date	Commenter	Comment	Response	Action
25	Whole GSP	10/14/2021	Douglas Deitch, Monterey Bay Conservation	See letter attached.	Received	1. SVBGSA has funded the Deep Aquifers Study and is co-funding the development of a Seawater Intrusion Model with MCWRA. The SVOM climate change simulation include sea level rise. DWR Climate Change guidance recommends using values of +15 cm for 2030 projected conditions and +45 cm for 2070 projected conditions. 2. SVBGSA is undertaking a study of the Deep Aquifers to better understand the Aquifers, their current condition, and management options. This is distinct from the Monterey One Water ASR wells, which are located in the Seaside Basin.
26	Whole GSP	10/15/2021	Heather Lukacs, Justine Massey, and Mayra Hernandez, Community Water Center & Horacio Amezquita, San Jerardo Cooperative, Inc	See letter attached.	Received	See responses to letters by CWC and San Jerardo dated 7/10/20, 4/23/21, 4/28/21, and 6/17/21. SVBGSA in coordination with legal counsel has developed improved water quality SMC language to be included in the final draft of the GSP. This language is in response to DWR's comments about the water quality SMC language in the 180/400-Foot Aquifer Subbasin GSP. In addition, during the public comment period, an analysis on the Central Valley on groundwater extraction during droughts and nitrates was released. During GSP implementation, SVBGSA can consider this new analysis and whether it has potential applicability in the Salinas Valley. SVBGSA will look at climate change assumptions as part of 5-year update.
27	Whole GSP	10/15/2021	Tyler Sullivan, California Coastkeeper Alliance, and Sean Bothwell, Monterey Waterkeeper	See letter attached.	Received	2 and 3. While the 180/400 looked at projects and management actions that involved the whole Valley, the focus was on the 180/400. During subbasin committee meetings, members agreed that while any projects and management actions will be evaluated in a valley-wide light, only the plans that would primarily help that subbasin reach or maintain sustainability should be included in the plan. To ensure projects and management actions are selected and implemented in an integrated manner, SVBGSA established the Integrated Implementation Committee. While the subbasin GSPs were developed through subbasin planning committees, GSA staff and consultants ensured the projects and management actions, as well as the plans, are not in conflict with each other. SVBGSA will look at climate change assumptions as part of 5-year update. The GSP includes both projects and management actions. Subbasin committees preferred to pursue projects prior to pumping reductions; however, the Plan does include the potential for demand management if needed. SVBGSA is aware of its legal responsibilities and has developed plans that include sufficient options to meet sustainability goals. 4. Under SGMA, what constitutes 'significant and unreasonable' conditions are locally defined and balance uses and users. The subbasin committee established the SMC. According to the Belin article, the Salinas Valley constitutes an 'yellow light' - there are no ESA-related in-stream flow requirements, but impacts from groundwater extraction on both ESA-protected steelhead and other GDEs should be evaluated to see if there are adverse impacts. This GSP no longer relies on the biological opinion, including for water budgets. SVBGSA is only responsible for depletion of interconnected surface water due to groundwater extraction, not for reservoir releases or surface water flows. In addition to working with NMFS to determine what constitutes an adverse impact to steelhead in relation to groundwater extraction, this GSP includes both supply-side and demand-side management options to maintain sustainability. In particular, following each annual report, the SMC TAC will evaluate sustainability and recommend actions if necessary. 5. After careful consideration and consultation with attorneys, the final GSP includes revised water quality undesirable results text that addresses DWR's comments on the 180/400-Foot Aquifer Subbasin GSP. The Partnership (now called the Coordination Group), includes space to coordinate with the CCRQCB, as suggested. SVBGSA intends to establish that Coordination Group during the first two years of GSP implementation. 6. SVBGSA has made a concerted effort to address DAC issues and involve DACs in decision making. SVBGSA has met with CWC several times, and has also incorporated several of their suggestions into the GSPs. In a discussion regarding groundwater levels, at a workshop one DAC community member highlighted that the farmworkers depend on agriculture for their livelihoods in this basin, and they don't want to set groundwater level goals at a level that will significantly harm agriculture, so there must be a balance. SVBGSA has sought that balance, involving DACs all the way up to their permanent seat on the Board of Directors. Additionally, SVBGSA worked to assess the needs and barriers to DAC involvement and developed the DAC Engagement Strategy to guide outreach and involvement going forward. The GSP addresses the Human Right to Water and highlights how in Ch 3, 8, and 10.
28	Whole GSP	10/15/2021	Elizabeth Krafft, Monterey County Water Resources Agency	See letter attached.	Received	SVBGSA appreciates the support for the conceptual projects and management actions within the GSP, and during GSP implement will work with the MCWRA on the refinement and implementation of any that involve MCWRA infrastructure or water management. Volume 1 and 2 text was revised as suggested.

Chapter 2
Appendix 2-B

Agency-Wide Marketing & Communications Plan

Appendix 2B. Agency-Wide Marketing & Communications Plan



Chapter 2
Appendix 2-C

Key Messages

Appendix 2C. Key Messages

Initially, our message points focus on: (1) **getting to know your GSA**; (2) **an overview of groundwater sustainability planning for our community**; and (3) **how we got here**. The key messages will be expanded as the work evolves.

Key Messages: Get to Know Your GSA

- The SVBGSA is on a mission to develop a Salinas Valley Integrated Groundwater Sustainability Plan by 2023 and achieve groundwater sustainability in the Salinas Valley by 2040.
- Our groundwater basin is comprised of 6 subbasins one of which is identified as "Critically Over-Drafted" – the 180/400-Foot Aquifer.
- The rate of the community's current water use is unsustainable. To meet our community's ongoing water supply needs now and into the future we must balance the basin.
- The State has put us on a tight timeline to fix the problem. We ambitiously accept the challenge.
- As of 2020, we have GSP for the 180/400-Foot Aquifer Subbasin and have scoped projects and programs to bring the subbasin back into balance.
- From 2020 through 2022 we will work on GSPs for the other five basins.
- We will start implementing our plans immediately and efficiently use our GSA sustainability fee to work towards sustainability.
- Developing a sustainability plan for groundwater impacts everyone. That's why the SVBGSA Board and our Advisory Committee are diverse and include stakeholders from every walk of life in the Salinas Valley.
- We have an unprecedented opportunity, and responsibility, to work together collaboratively and develop a science-based Groundwater Sustainability Plan.
- Join us! Visit our website, sign up for updates, attend the next meeting and follow us on Facebook.

Key Messages: Groundwater Sustainability Plan

The Eastside Subbasin Groundwater Sustainability Plan and Salinas Valley Integrated Sustainability Plan are our 20-year plans to ensure that the Salinas Valley Groundwater Basin (SVGB) will be managed sustainably for our current and future generations.

- Aquifer subbasin planning is not only critical to our future - it's mandatory. SGMA mandates that science-based GSPs be developed for the Basin by 2020 and 2022, and that the plan be implemented by 2040.
- The stakes are high. Should we choose not to act, or fail to meet the 2020, 2022, or 2040 milestones, the State can intervene with required (and hefty) pumping restrictions and extraction fees.
- To meet these milestones, we have been granted the authority to develop GSPs, monitor and measure the basin and individual wells within the basin, implement capital projects, and assess necessary fees for planning and implementation.
- Six "Sustainability Indicators" will be evaluated in the GSPs and used to gauge what we need to do to bring our groundwater supply and demand back into balance.
- Given the hydrologic and geographic diversity of the SVGB, the ISP will identify overlapping projects and programs which benefit the basins. Our planning process includes initiating planning committees for the subbasins and maintains our governance structure of the Board, advisory committee, and planning committee.
- Stakeholder engagement is a key component to the development and implementation of the GSP. We encourage and invite the community to get involved. Attend our monthly Board meetings, attend a Subbasin Planning Committee meeting, sign up for our newsletter.

Key Messages: Our History

- The Salinas Valley Basin GSA is firmly rooted in stakeholder engagement.
- From 2015-2017, local agencies and stakeholders worked with the Consensus Building Institute (CBI) to facilitate the formation of the GSA.
- In 2015, CBI began by conducting a Salinas Valley Groundwater Stakeholder Issue Assessment, which included interviews and surveys. This process resulted in recommendations for a transparent, inclusive process for the local implementation of SGMA and the formation of the GSA.
- Following the Issue Assessment, The Collaborative Work Group of stakeholders representing a broad range of interests met from March 2016 through April 2017 and developed recommendations on the governance structure, voting, and legal structure of the GSA.
- The Stakeholder Forum was simultaneously held throughout 2016 and served as a critical element for interested stakeholders and the public to learn about and provide input on the GSA.

- After nearly two years of community engagement led by the top consensus-building professionals in the nation, the Salinas Valley Basin Groundwater Sustainability Agency was formed in April 2017 with a broad and diverse foundation of support.

Chapter 2
Appendix 2-D

Media Policy

Appendix 2D. Media Policy

The press is an important partner for getting our message out to the community. To maximize our effectiveness in working with the media, a consistent protocol will be followed by staff, consultants, board members, and committee members.

Agency Spokesperson(s)

- The primary spokesperson for all media inquiries is the General Manager (GM). Media inquiries should first be directed to the GM to coordinate a response.
- Reporters may want to also interview board and community members. Some board members may enjoy media conversations, while others do not. The SVBGSA will maintain a standby list of a few board and community members, who will be prepared and can be called on for media inquiries.
- In preparation for the interview, the GM and Public Information Officer (PIO) will work closely with the spokespeople in preparation for media interviews. Factual and coordinated talking points will be provided in advance of the interview.

Responding Quickly

- Reporters work on tight deadlines. To ensure an opportunity is not missed, all media inquiries should receive an immediate response and referred to the GM at the earliest possible opportunity.

The Back-Up Plan

- If the GM is unavailable and cannot be reached for comment, media inquiries should be directed to the Board's back-up media representative. The Board's representative will contact the PIO to determine whether a response is necessary. If the response is not urgent, offer the media an appointment time for when the GM is available. If it is a time sensitive and urgent matter, a statement will be released from the Board representative in close coordination with the PIO.

News Monitoring and Tracking

- Following the interview or statement, if published, the GM or PIO will circulate the coverage to the Board and committee members.

Chapter 2
Appendix 2-E

Disadvantaged Communities (DACs)

APPENDIX 2E. DISADVANTAGED COMMUNITIES (DACs)

Introduction and Purpose of Appendix

Many of the communities in the Salinas Valley Groundwater Basin are classified as Disadvantaged Communities (DACs) and Severely Disadvantaged Communities (SDACs), as well as Economically Distressed Areas (EDAs). The SVBGSA jurisdictional area has well documented DAC-designated areas including seven Census Designated Places (CDPs), 60 Block Groups, and 20 Tracts. Additionally, work conducted by the Greater Monterey County Integrated Regional Water Management (IRWM) Program identified 25 small disadvantaged, severely disadvantaged, and suspected disadvantaged communities in unincorporated areas of the IRWMP region (Greater Monterey County Regional Water Management Group, 2018), which includes the entire SVBGSA area. As many of these communities are dependent on groundwater for drinking water, they face challenges associated with drinking water quality.

The State of California has recognized challenges in providing clean, safe, and affordable drinking water to all of its citizens, especially low-income and minority communities. In 2012, California law AB 685, the Human Right to Water, declared that every person has a right to clean, safe, and affordable drinking water. In 2019, the State further made it a priority by passing SB 200, the Safe and Affordable Drinking Water Fund. In Fiscal Year 2019-2020 alone, it will dedicate $130 million for safe drinking water solutions in DACs that do not have access to safe drinking water.

The Salinas Valley Groundwater Basin is one of the most productive agricultural regions in the world. However, over several decades seawater intrusion and intensive fertilizer use resulting in nitrate contamination have compromised drinking water quality in parts of the Basin. Nitrate contamination in groundwater can pose serious health risks to pregnant women and infants if consumed at concentrations above the maximum contaminant level (MCL) of 10 milligrams per liter (mg/L) nitrate as nitrogen (NO_3-N). Nitrate contamination not only poses health risks, but also results in major costs for small rural communities. This is particularly challenging for the many economically disadvantaged communities in the Basin.

SGMA has limited requirements with regards to improving groundwater quality; the SGMA regulations are written in terms of avoiding degradation (CWC, §354.28 (c)(4)). However, the SVBGSA seeks to engage more constructively with disadvantaged communities moving forward in the subbasin planning processes. SVBGSA maintains excellent relationships with agencies monitoring and addressing water quality issues in the Basin. The purpose of this appendix is to provide background information on the relationship between DACs (including SDACs and EDAs) and groundwater, particularly with respect to the drinking water challenges in the Basin. Unless otherwise noted, the information in this appendix is based on and much is excerpted from the Integrated Regional Water Management (IRWM) Plan for the Greater Monterey County Region (Greater Monterey Regional Water Management Group, 2018).

Identifying DACs in the Salinas Valley

A Disadvantaged Community (DAC) is defined in the California Water Code (§79505.5(a)) as a community with an annual median household income that is less than 80% of the statewide annual median household income, based on five-year estimates. Further, a Severely Disadvantaged Community (SDAC) is defined as a community with an annual median household income that is less than 60% of the statewide annual median household income, based on five-year estimates. For information on how these designations are determined, see the Greater Monterey County Integrated Regional Water Management Plan (Greater Monterey County Regional Water Management Group, 2018). These designations are significant because in order for a community to be eligible for State grant funds specially allocated for disadvantaged communities, or to be eligible for reduced matching fund requirements, a community must meet one of these strict definitions.

At the same time, the California Department of Water Resources (DWR) also recognizes the existence of communities that are economically challenged but that are not designated as being disadvantaged according to U.S. Census data. These communities have been labeled Suspected Disadvantaged Communities until their status can be proven either way.

In addition to disadvantaged communities, DWR recognizes Economically Distressed Areas. An economically distressed area (EDA) is defined as:

> *…a municipality with a population of 20,000 persons or less, a rural county, or a reasonably isolated and divisible segment of a larger municipality where the segment of the population is 20,000 persons or less, with an annual median household income that is less than 85 percent of the statewide median household income, and with one or more of the following conditions as determined by the department: (1) financial hardship, (2) unemployment rate at least 2 percent higher than the statewide average, or (3) low population density (Water Code §79702(k)).*

Figure 1 shows the communities currently designated as DACs, SDACs, or EDAs in the Salinas Valley. This figure combines census tracts, blocks, and places to give a more complete representation of the communities within this area. Currently, the statewide median household income is $63,783. Therefore, the calculated DAC and SDAC thresholds are $51,026 and $38,270, respectively (see [https://water.ca.gov/Work-With-Us/Grants-And-Loans/Mapping-Tools)](https://water.ca.gov/Work-With-Us/Grants-And-Loans/Mapping-Tools). For example, Castroville has a median household income of $35,000 (Rural Community Assistance Corporation, 2017). Moss Landing is not currently designated as a DAC; however, according to a survey by the California Rural Water Association (2018), its median household income is $47,600.

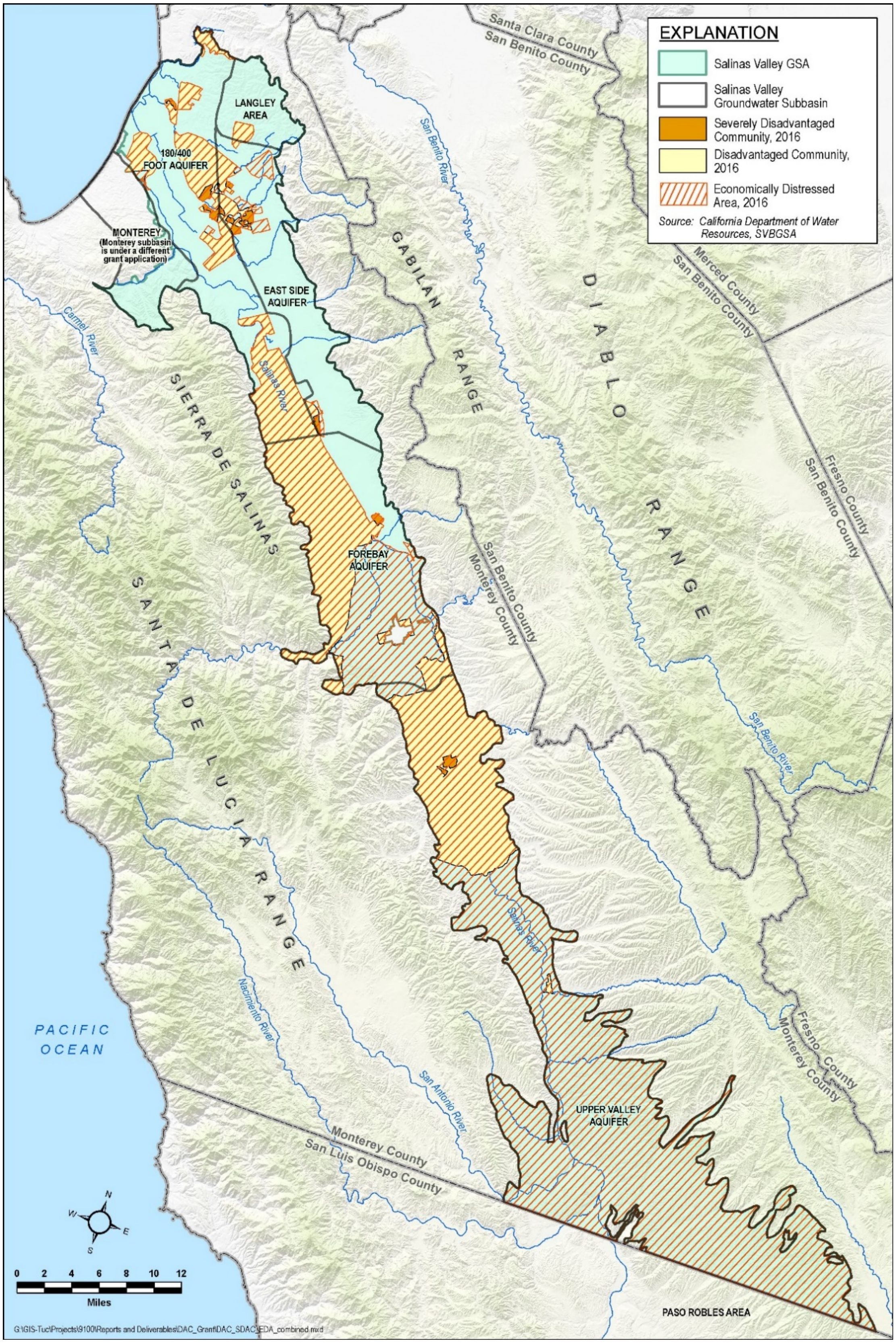


Figure 1. Map of DACs, SDACs, and EDAs in the Salinas Valley Groundwater Basin

As highlighted in the IWRM Plan, small disadvantaged communities in unincorporated areas often have small public water systems that serve fewer than 200 connections. The smallest of these communities have State Small Water Systems (SSWS), which serve between five and 14 connections); Local Small Water Systems (LSWS), which serve between two and four connections; and/or households served by private domestic groundwater wells. There is a significant difference in capacity, water supply, and infrastructure needs between a DAC served by a large water system (e.g., a large disadvantaged community of several thousand people, or a small disadvantaged community served by a large water utility) and a small disadvantaged community served by a small water system or by private wells. The State Water Resources Control Board (SWRCB) summarized these differences in its 2015 report, Safe Drinking Water Plan for California (SWRCB, 2015):

- Small water systems have the greatest difficulty in providing safe drinking water because they are least able to address the threats to public health associated with water quality.
- Larger water systems are better equipped to deal with water quality issues because they have more customers to fund the necessary improvements, have economy of scale, more technical expertise, better management skills and knowledge, are able to solve operational problems internally, and have dedicated financial and business-related staff. They generally have more sophisticated treatment and distribution system operators who are able to react to incidents and changes in treatment conditions that may occur during operations.
- On the other hand, small systems, especially those in disadvantaged communities, have only a small number of customers, which provides them with limited fiscal assets and no economy of scale. They often lack technical expertise, the ability to address many of the issues pertinent to operating a water system, as well as qualified management and financial and business personnel. In many instances, especially for very small water systems, the system operator may be just a part-time position.

Following the Greater Monterey County IRWM Plan, this Appendix includes DACs, SDACs, and EDAs and places an emphasis on small disadvantaged communities for the reasons highlighted by the SWRCB.

Jurisdictional Responsibilities

A number of agencies and groups have existing jurisdictional responsibility over groundwater quality. The SVBGSA will collaborate with these agencies and groups so as to not duplicate efforts or overstep its institutional authority. The following agencies and groups have responsibility over various aspects of groundwater (Greater Monterey County Regional Water Management Group, 2018):

- **Greater Monterey County IRWM Regional Water Management Group** – AB1630 appropriated State grant funds to enable this Group to develop solutions for DACs to be integrated into the broader IRWM planning effort. IRWM is a voluntary, collaborative effort to identify and implement water management solutions on a regional scale to increase regional self-reliance, reduce conflict, and manage water resources. The IRWM planning process brings together water and natural resource managers along with other community stakeholders to collaboratively plan for and ensure the region's continued water supply reliability, improved water quality, flood management, and healthy functioning ecosystems. The Department of Water Resources manages grant programs specifically designated for adopted IRWM Plans including funding for water quality improvement projects.
- **State Water Resources Control Board (SWRCB)** – The SWRCB administers the state's Drinking Water Program as the federally-designated Primary Agency responsible for the administration and enforcement of the Safe Drinking Water Act requirements in California. Prior to July 1, 2014, the California Department of Public Health was designated as the Primary Agency. These requirements are defined in the California Health and Safety Code and Titles 17 and 22, California Code of Regulations. The CDPH continues to maintain the State's Drinking Water and Radiation Laboratory, which serves as the state's principal laboratory as required for primacy under the Safe Drinking Water Act. The SWRCB is responsible for the regulatory oversight of over 7,600 public water systems in California. It may delegate oversight responsibility of public water systems with less than 200 service connections to local county health departments, which it has done in Monterey County.
- **Monterey County Department of Environmental Health (MCDEH)** – Delegated oversight responsibility by the SWRCB, MCDEH is the Local Primary Agency and its Drinking Water Protection Services regulates domestic water systems in the County that serve between two and 199 connections. There are approximately 160 such systems in the County regulated under this program. MCDEH also regulates all well construction in Monterey County.
- **SWRCB and Central Coast Regional Water Quality Control Board** – State policy on water quality control falls under the SWRCB, which is the state water pollution control agency for all purposes under the Clean Water Act (CWC §13160), including drinking water sources from both surface water and groundwater. The SWRCB has nine regional boards, including the Central Coast Regional Water Quality Control Board (CCRWQCB), which is responsible for the day-to-day implementation of the federal Clean Water Act and California's Porter-Cologne Water Quality Control Act in the Central Coast. Together, the State Water Board and Regional Boards are responsible for the protection of the quality of ambient surface and groundwater up to the point where the water enters a drinking water well or surface water intake. The Regional Boards are

responsible for developing and enforcing water quality objectives and implementation plans to protect the beneficial uses of the State's waters. The Regional Boards enforce water quality regulations through the following means.

  - **Basin Plan –** Each Regional Board is directed to formulate a water quality control plan, called a Basin Plan, that includes water quality standards under the Clean Water Act. The CCRWQCB implements the Basin Plan in the Central Coast Region, in part by issuing and enforcing waste discharge requirements to individuals, communities, or businesses whose waste discharges can affect water quality, including surface water, groundwater, or wetlands.
  - **Waste Discharge Requirements (WDRs) –** WDRs, sometimes simply known as Orders, for discharges to waters of the United States also serve as National Pollutant Discharge Elimination System (NPDES) permits. The SWRCB and CCRWQCB regulate discharges from wastewater treatment and disposal systems under general WDRs. Small, domestic wastewater treatment systems having a maximum daily flow of 100,000 gallons per day (gpd) or less that discharge to land are covered under a statewide general WDR permit for small systems (Order WQ 2014-0153-DWQ). The State and Regional Boards are also responsible for plans and permits related to other uses, such as farming, septic tanks, and larger scale sewage treatment that can also impact the quality of surface and ground waters.
  - **Irrigated Lands Regulatory Program (ILRP) –** The SWRCB initiated the ILRP in 2003 to control agricultural runoff's impairment of surface waters. In 2012, groundwater regulations were added to the program. Waste discharge requirements, which protect both surface water and groundwater, address agricultural discharges throughout the Central Coast. Anyone who irrigates land to produce crops or pasture commercially must seek ILRP permit coverage and maintain in good standing with their coalitions.

- **Department of Pesticide Regulation** – The California Department of Pesticide Regulation is responsible for ensure that pesticides do not contaminate the groundwater.
- **Office of Environmental Health Hazard Assessment** – The California Office of Environmental Health Hazard Assessment is responsible for providing the SWRCB with health-based risk assessments for contaminants. These assessments are used to develop primary drinking water standards.
- **California Public Utilities Commission (CPUC)** – The CPUC is responsible for ensuring that California's investor-owned water utilities deliver clean, safe, and reliable water to their customers at reasonable rates. The Water Division regulates over 100 investor-owned water and sewer utilities under the CPUC's jurisdiction; providing water service to about 16 percent of California's residents.

- **Local Agency Formation Commissions (LAFCOs)** – These commissions oversee the expansion of service areas of public agencies, including cities that own or operate public water systems. They can review public agencies to determine if the agency is providing municipal services in a satisfactory manner, including the delivery of safe drinking water.
- **Central Coast Groundwater Coalition (CCGC)** – The CCGC is a non-profit 501(c)5 mutual benefit organization that represents landowners and growers who operate in Monterey, San Benito, Santa Clara, Santa Cruz, San Luis Obispo, and Santa Barbara counties, as well as the northern portion of Ventura County in the Central Coast Region. The CCGC is not a governmental organization like the other jurisdictional agencies, and therefore does not have legal jurisdictional authority. However, the CCGC is the primary organization tasked with fulfilling the groundwater quality regulatory requirements in the Irrigated Lands Regulatory Program (ILRP) of the Central Coast Regional Water Quality Control Board. The organization combines the resources of its members to achieve economies of scale to comply with the regulatory requirements of the CCRWQCB. Between 2013 and 2015, the CCGC characterized the rural drinking water supply and shallow groundwater aquifer in the CCGC region which includes the previously noted six counties. In addition to using data from member wells, CCGC gathered publicly available data generated by the counties and data submitted by landowners and growers who perform individual monitoring as part of the current ILRP. Information collected on tested wells included depth to groundwater and well perforation levels where available. For many wells, quality parameters were collected, such as nitrates and total dissolved solids (TDS). In the groundwater characterization report, the information from the six counties was compiled and analyzed to produce maps showing areas where groundwater quality exceeds drinking water limits for nitrates. This information enabled CCGC to develop an accurate groundwater characterization in 2015 which provides growers, regulators and the public with a better understanding of local aquifers and geology in the six-county region.

DAC Drinking Water Challenges

Drinking water systems are categorized according to the number of service connections:

- Public water systems, which are referred to as municipal public water systems in this GSP for clarity, are water systems that provide drinking water to at least 15 service connections or serve an average of at least 25 people for at least 60 days a year,
- State small water systems are water systems that provide piped drinking water to between five and 14 service connections, and do not regularly serve drinking water to more than an average of 25 individuals daily for more than 60 days out of the year,
- Local small water systems are water systems that provide drinking water to between two and four service connections, and

- Private domestic wells usually provide water to only one or two connections.

Since state small water systems, local small water systems, and private domestic wells face more severe drinking water challenges than public water systems, they are the focus for the following discussion.

Private domestic wells are not regulated by the State. MCDEH requires one-time nitrate testing of newly installed private domestic wells, but there are no additional requirements. The SWRCB's Groundwater Ambient Monitoring and Assessment (GAMA) Domestic Well Project was developed in order to address the lack of domestic well water quality data. The GAMA Groundwater Information System includes numerous datasets that can be downloaded by users. The CCRWQCB also collects domestic well data per Irrigated Lands Regulatory Program (ILRP) groundwater monitoring requirements.

Between October 2013 and August 2014, the CCGC compiled water quality data from 229 samples from domestic and irrigation wells in the Salinas Valley. Data were collected from the GeoTracker GAMA database that includes data from the California Department of Public Health, GAMA-SWRCB data collection efforts and Regulated Sites. Additional data were collected from the USGS National Water Information System data, and data were extracted from the GAMA special study carried out by Lawrence Livermore National Laboratory. In its 2015 *Groundwater Characterization Report* (CCGC, 2015), CCGC made the following conclusions regarding nitrate in the Salinas Valley:

- 41% of wells with nitrate concentrations (or 309 of 758 total wells sampled) had maximum concentrations over the MCL.
- 34% of the land area within the Salinas Valley has nitrate concentrations over the MCL.
- 55% of domestic wells or 121 of 221 total sampled on CCGC-member properties had concentrations exceeding the MCL.

Domestic wells and wells associated with local small and state small water systems are generally more susceptible to nitrate contamination since they are typically shallow and are more likely to be located in rural areas within or adjacent to agricultural areas. They are also more susceptible to potential nitrate contamination from nearby septic systems. Public water systems, on the other hand, tend to access deeper groundwater and are more likely to be located in areas that are less susceptible nitrate contamination. Public water system operators implement regular water quality testing and treatment as necessary, and wells are usually taken out of service once they become contaminated. Funding programs are often available for public water systems, and costs are spread out over a large number of ratepayers over time. When contamination is detected in private domestic wells, treatment options are limited and the individual homeowner will typically have to bear the full cost of addressing the problem (CCGC, 2015).

According to the IRWM Plan, only a very small percentage of domestic wells in Monterey County have been tested through the Central Coast Regional Water Quality Board's groundwater monitoring programs. MCDEH has recently adopted a policy to begin requiring well testing when an application for repair or replacement of a septic system is proposed, which will provide new additional data.

MCDEH Drinking Water Protection Services regulates state small and local small water systems through their Small Water System Program. There are currently 694 local small and 276 state small water systems in Monterey County, which serve about 4,232 connections (Greater Monterey County Regional Water Management Group, 2018).

DACs in the Basin rely primarily on groundwater for their drinking water supply, except for those who rely on bottled water due to unsafe or poor water quality conditions. The primary drinking water problems experienced by small DACs in Monterey County are related to nitrate contamination, seawater intrusion, or other contaminants of concern. Numerous studies over the decades have documented these challenges.

Insufficient water quantity is generally less of a problem in the Salinas Groundwater Basin than poor or unsafe water quality; although poor water quality effectively results in insufficient water supply. During the recent prolonged drought, while Monterey County was classified as experiencing "exceptional" drought, very few water users in the Greater Monterey County IRWM region actually suffered from a lack of water availability. While the drought had immediate impacts on surface water supplies throughout the State, it tended to have a more gradual impact on groundwater supplies. Groundwater quality, rather than quantity, is of primary concern for drinking water supplies in the Salinas Valley Groundwater Basin, particularly nitrate contamination and seawater intrusion.

Nitrate Contamination

Nitrate contamination is particularly problematic in the Salinas Valley Groundwater Basin, where agriculture dominates the landscape. Nitrate is currently extensively monitored and evaluated by the CCGC and is documented in a report submitted to the CCRWQCB (CCGC, 2015). Nitrate contamination in the Salinas Valley was first documented in a report published by the Association of Monterey Bay Area Governments (AMBAG) in 1978. In 1988, a report by the State Water Board documented that nitrate levels in the Salinas Valley groundwater had impaired its beneficial use as a drinking water supply. In a July 1995 staff report, the SWRCB ranked the Salinas Valley as their number one water quality concern due to the severity of nitrate contamination. All of the Salinas Valley cities have had to replace domestic water wells due to high nitrate levels that exceed the drinking water MCL. Maps prepared by the MCWRA indicate that elevated nitrate concentrations in groundwater were locally present through the 1960s, but significantly increased in the 1970s and 1980s.

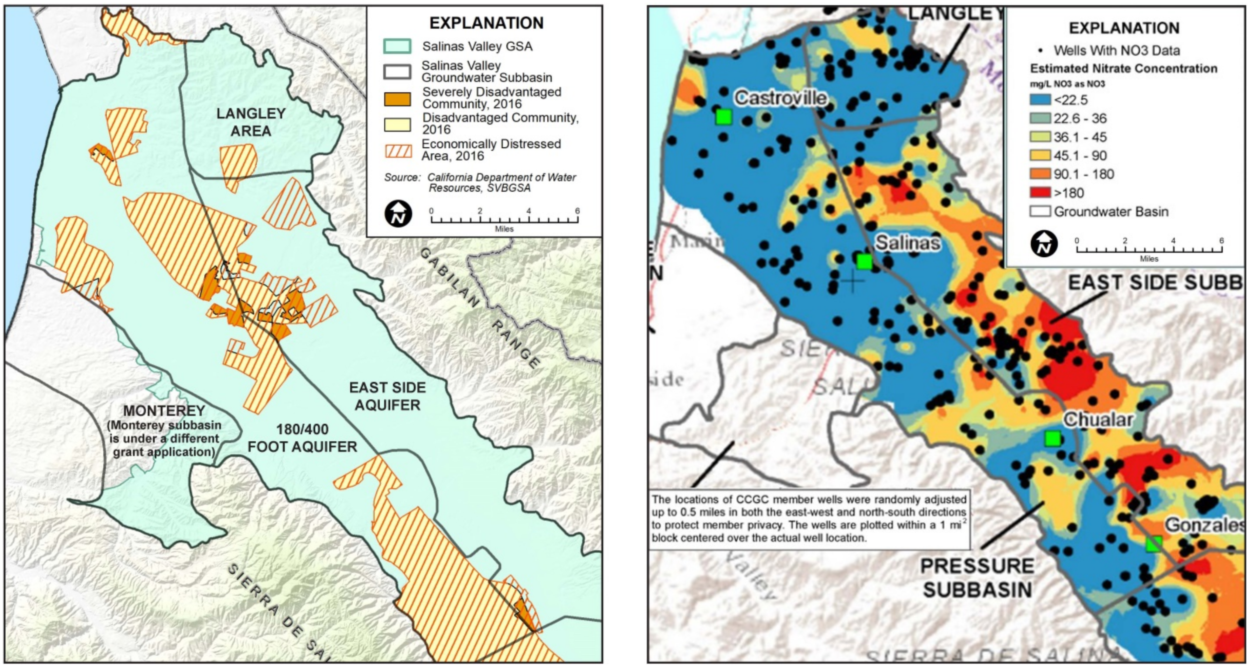


Figure 2. DACs, SDACs, and EDAs in the 180/400-Foot Aquifer Subbasin and Nitrate Concentration Map developed by CCGC (2015)

Seawater Intrusion

Seawater Intrusion is another major water quality concern for DACs and SDACs, primarily impacting coastal communities in the northern part of the Salinas Valley Groundwater Basin. Seawater intrusion has been observed in the 180-Foot and 400-Foot Aquifer Subbasin for over 70 years, and was documented in DWR Bulletin 52 in 1946. By the 1940s, many agricultural wells in the Castroville area had become so salty that they had to be abandoned (Greater Monterey County Regional Water Management Group, 2018). Seawater is high in chlorides. EPA defines the 500 mg/L threshold as an Upper Limit Secondary Maximum Contaminant Level (SMCL). Seawater intrusion is the primary threat to drinking water supplies for many DACs located in the northern coastal portion of the Basin.

Seawater has intruded inland in the 180-Foot and 400-Foot Aquifers, as shown on Figure 3 and Figure 4. Seawater intrusion in the 180-Foot Aquifer covered approximately 20,000 acres in 1995 and had expanded to approximately 28,000 acres by 2010. Since then, the rate of expansion has decreased, with an overlying area of 28,300 acres in 2017. The area overlying intrusion into the 400-Foot Aquifer is not as extensive, with an overlying area of approximately 12,000 acres in 2010. However, between 2013 and 2015, the 400-Foot Aquifer experienced a significant increase in the area of seawater intrusion, from approximately 12,500 acres to approximately 18,000 acres, likely resulting from localized downward migration between aquifers.

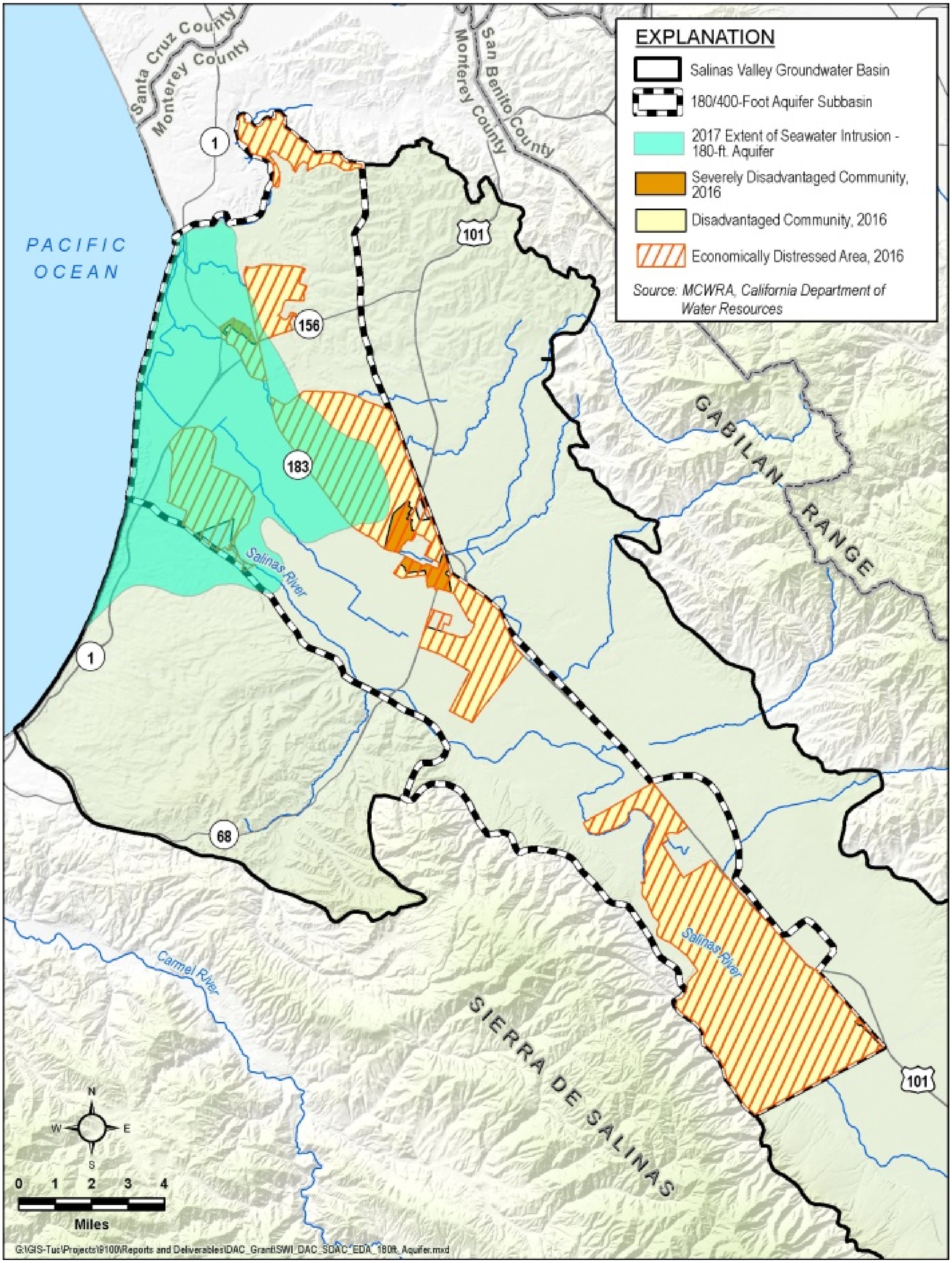


Figure 3. 2017 Extent of Seawater Intrusion in the 180-Foot Aquifer

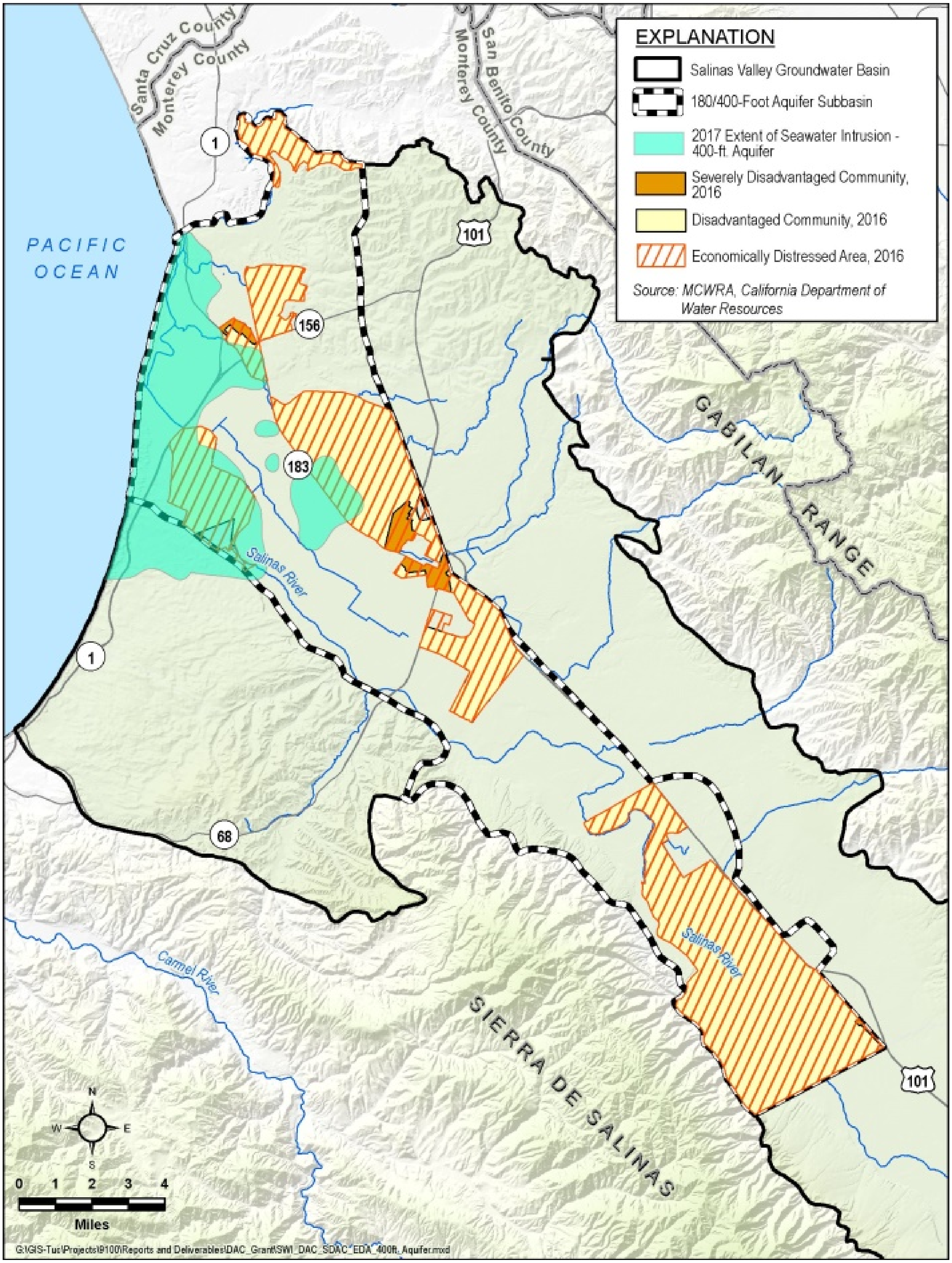


Figure 4. 2017 Extent of Seawater Intrusion in the 400-Foot Aquifer

Other Contaminants of Concern

In addition to nitrates and seawater intrusion, there are a few other contaminants of concern. With the recent passage of Assembly Bill (AB) 1249 (Salas, Chapter 717, Statutes of 2014), the State has recognized the prevalence, and urgency to address, the contamination of drinking water supplies in California by not only nitrate, but specifically by arsenic, perchlorate, and hexavalent chromium. The Greater Monterey County IRWM Regional Water Management Group is currently working with a Technical Advisory Committee, which includes MCDEH and the Central Coast Regional Water Quality Control Board, to identify the extent of nitrate, arsenic, perchlorate, and hexavalent chromium contamination in communities throughout the region. This group will develop a plan to address the contamination from these additional contaminants of concern.

Conclusion

The State of California has recognized the severity of drinking water challenges for DACs with the passage of the 2012 Human Right to Water Act (AB 685), which declared that every person has a right to clean, safe, and affordable drinking water. Further, it emphasized this state-wide focus with the Safe and Affordable Drinking Water Fund in 2019, which provides funding specifically for safe drinking water solutions in DACs that do not have access to safe drinking water.

This appendix highlights the relationship between DACs and groundwater in the Salinas Valley Groundwater Basin, particularly with respect to drinking water. It provides a base for the SVBGSA to engage DACs in a strategic dialogue and support state and local efforts related to drinking water.

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Chapter 4

Appendix 4A

ISW Seasonality Analysis

Appendix 4a. ISW Seasonality Analysis

Surface water and groundwater can be hydrologically connected along a stream reach during some months of the year and not others. These temporal variations of interconnected surface water (ISW) during a given year are the result of variations in recharge, precipitation, groundwater pumping, and riparian evapotranspiration. Along the Salinas River, monthly changes in reservoir operations also influence ISW reaches. Hydrologic connectivity in the Salinas Valley is estimated using results from the provisional SVIHM. Along the Salinas River, the timing of reservoir releases is used to determine the months that the ISW sustainable management criteria applies since releases during the peak conservation period (June through September) are intended for groundwater recharge. The ISW delineated along the Salinas River in section 4.4.5.1 of the GSP represent reaches that are connected during a majority (greater than 50%) of months during the non-peak conservation release period (October through May) over the full SVIHM simulation period from 1967 to 2017. However, model results indicate that the ISW length along the Salinas River is virtually the same throughout the year, connected the vast majority of time.

For tributaries or streams away from the Salinas River, reservoir releases have less impact on ISW, if any, than for the Salinas River. To estimate the seasonal variability of ISW for stream reaches away from the Salinas River, a monthly analysis. These locations are the best estimates of where persistent hydrologic connections occur along streams in the Salinas Valley. However, the lateral extents (lengths) of these reaches vary from month to month during the year, as well as from year to year.

To understand whether surface water is connected to groundwater only during certain months, a monthly analysis was undertaken. The monthly analysis produces 2 pieces of information for each month of the year: (1) the average percent of years simulated by the SVIHM that a stream has hydrologic connection, based on the average monthly connectivity of every model grid cell identified as ISW along the stream, and (2) the average extent of where hydrologic connection occurs. Figure 1 shows the average percent of time when connectivity occurs at any location along a given stream in Salinas Valley. These data show the average temporal connectivity along the entire length of a stream; however, some reaches of the stream have much lower or higher connectivity then indicated by the average values. The results on Figure 1 are most useful for identifying the seasonal trends of connectivity for streams. Tributaries to the river and streams away from the river show seasonal variation in connectivity, with higher average connectivity in the Winter and Spring months and lower average connectivity in the Summer months.

Consistent with the seasonal variations in average time of connectivity, the lengths of ISW along the streams away from the Salinas River are generally longest during the late Winter and Spring months and shortest during the late Summer months. The average ISW length varies during the year in the Langley Area Subbasin and along Arroyo Seco in Forebay Subbasin, with the locations of ISW in 4.4.5.1 representing the stream reaches with more consistent connection. The lengths of average ISW away from Salinas River in Upper Valley vary very little, if at all, during the year. The average monthly variations and extents are based on results from the provisional SVIHM and are subject to change in future updates to the GSP as additional data increases the understanding regarding ISW extents.

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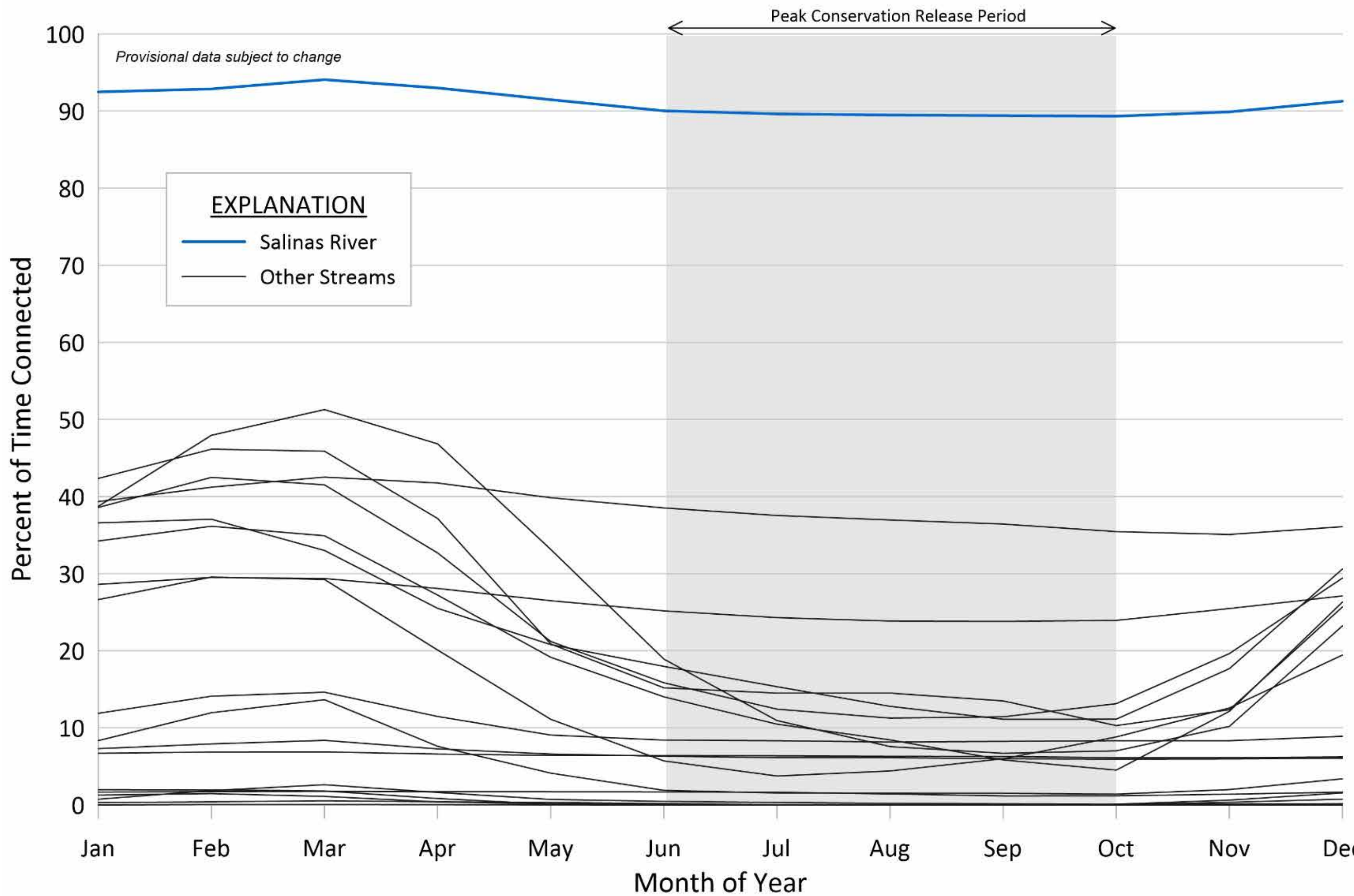

Chapter 3
Appendix 3-A

Water Systems

Table 1. Small Water Systems (2-14 connections)

Water System Name	ID	Connections	Population Served	Subbasin
ALISAL RD WS #01	2702233	N/A	N/A	EASTSIDE AQUIFER
ALISAL RD WS #02	2702497	N/A	N/A	EASTSIDE AQUIFER
ALISAL RD WS #03	2702519	N/A	N/A	EASTSIDE AQUIFER
BORONDA RD WS #07	2702557	N/A	N/A	EASTSIDE AQUIFER
CHUALAR CANYON WS #01	2701188	N/A	N/A	EASTSIDE AQUIFER
CHUALAR CANYON WS #03	2701523	N/A	N/A	EASTSIDE AQUIFER
CHUALAR CANYON WS #04	2701775	N/A	N/A	EASTSIDE AQUIFER
CHUALAR CANYON WS #05	2701810	N/A	N/A	EASTSIDE AQUIFER
CHUALAR CANYON WS #07	2701478	N/A	N/A	EASTSIDE AQUIFER
CHUALAR CANYON WS #09	2702136	N/A	N/A	EASTSIDE AQUIFER
CHUALAR CANYON WS #11	2702386	N/A	N/A	EASTSIDE AQUIFER
CORONA RD WS 3	2702505	N/A	N/A	EASTSIDE AQUIFER
EL CAMINO REAL WS #01	2700560	N/A	N/A	EASTSIDE AQUIFER
EL CAMINO REAL WS #28	2701758	N/A	N/A	EASTSIDE AQUIFER
EL CAMINO REAL WS #33	2701108	N/A	N/A	EASTSIDE AQUIFER
EL CAMINO REAL WS #34	2700508	N/A	N/A	EASTSIDE AQUIFER
EL CAMINO REAL WS #35	2701218	N/A	N/A	EASTSIDE AQUIFER
EL CAMINO REAL WS #37	2701920	N/A	N/A	EASTSIDE AQUIFER
EL CAMINO REAL WS #43	2702282	N/A	N/A	EASTSIDE AQUIFER
ESPINOSA RD WS #08	2702012	N/A	N/A	EASTSIDE AQUIFER
ESPINOSA RD WS #09	2702298	N/A	N/A	EASTSIDE AQUIFER
GLORIA RD WS #01	2701678	N/A	N/A	EASTSIDE AQUIFER
GOULD RD WS #01	2701064	N/A	N/A	EASTSIDE AQUIFER
HARRISON RD WS #02	2701433	N/A	N/A	EASTSIDE AQUIFER
HARRISON RD WS #03	2701746	N/A	N/A	EASTSIDE AQUIFER
HARRISON RD WS #04	2701994	N/A	N/A	EASTSIDE AQUIFER
HARRISON RD WS #06	2702128	N/A	N/A	EASTSIDE AQUIFER
HARRISON RD WS #07	2702297	N/A	N/A	EASTSIDE AQUIFER
HARRISON RD WS #08	2702401	N/A	N/A	EASTSIDE AQUIFER
HARRISON RD WS #09	2702549	N/A	N/A	EASTSIDE AQUIFER
HARTNELL RD WS #01	2702681	N/A	N/A	EASTSIDE AQUIFER
HWY 101 WS #05	2702436	N/A	N/A	EASTSIDE AQUIFER
IVERSON RD WS #01	2701846	N/A	N/A	EASTSIDE AQUIFER
KOHARA NURSERY WS	2702161	N/A	N/A	EASTSIDE AQUIFER
MARTINES RD WS #03	2702119	N/A	N/A	EASTSIDE AQUIFER
MIDDLEFIELD RD WS #02	2700651	N/A	N/A	EASTSIDE AQUIFER
MIDDLEFIELD RD WS #03	2700652	N/A	N/A	EASTSIDE AQUIFER
MIDDLEFIELD RD WS #04	2700653	N/A	N/A	EASTSIDE AQUIFER
MIDDLEFIELD RD WS #09	2702515	N/A	N/A	EASTSIDE AQUIFER

Water System Name	ID	Connections	Population Served	Subbasin
MONTEREY ROSES WS	2700851	N/A	N/A	EASTSIDE AQUIFER
NATIVIDAD RD WS #03	2701456	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #06	2702107	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #07	2701993	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #08	2702366	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #13	2701780	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #14	2702017	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #15	2702191	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #16	2702310	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #17	2702443	N/A	N/A	EASTSIDE AQUIFER
OLD STAGE RD WS #19	2702548	N/A	N/A	EASTSIDE AQUIFER
RANCHO SALINAS PACKING WS	2702067	N/A	N/A	EASTSIDE AQUIFER
SAN JUAN GRADE WS #01	2701521	N/A	N/A	EASTSIDE AQUIFER
SAN JUAN GRADE WS #02	2700737	N/A	N/A	EASTSIDE AQUIFER
SPENCE RD WS #04	2701964	N/A	N/A	EASTSIDE AQUIFER
SPENCE RD WS #08	2701729	N/A	N/A	EASTSIDE AQUIFER
UTO GREENHOUSE WS	2701716	N/A	N/A	EASTSIDE AQUIFER
WHITE RD WS #01	2700805	N/A	N/A	EASTSIDE AQUIFER
ZABALA RD WS #01	2700860	N/A	N/A	EASTSIDE AQUIFER
ZABALA RD WS #02	2702518	N/A	N/A	EASTSIDE AQUIFER
APPLE AVE WS #01	2701580	N/A	N/A	FOREBAY AQUIFER
APPLE AVE WS #04	2705021	N/A	N/A	FOREBAY AQUIFER
AROYO SECO RD WS #04	2701831	N/A	N/A	FOREBAY AQUIFER
ARROYO SECO RD WS #08	2701045	N/A	N/A	FOREBAY AQUIFER
ARROYO SECO RD WS #13	2702352	N/A	N/A	FOREBAY AQUIFER
ARROYO SECO RD WS #14	2702376	N/A	N/A	FOREBAY AQUIFER
BOEKENOOGAN WINERY WS	2702744	N/A	N/A	FOREBAY AQUIFER
BRYAN EQUIP/VALLEY ELECT WS	2702359	N/A	N/A	FOREBAY AQUIFER
CENTRAL AVE WS	2701419	N/A	N/A	FOREBAY AQUIFER
DOUD RD WS #01	2701790	N/A	N/A	FOREBAY AQUIFER
DOUD RD WS #02	2702062	N/A	N/A	FOREBAY AQUIFER
EL CAMINO REAL WS #32	2701794	N/A	N/A	FOREBAY AQUIFER
ELM AVE WS #01	2701845	N/A	N/A	FOREBAY AQUIFER
FAIRVIEW RD WS #01	2702181	N/A	N/A	FOREBAY AQUIFER
FORT ROMIE RD WS #01	2700562	N/A	N/A	FOREBAY AQUIFER
FORT ROMIE RD WS #02	2701830	N/A	N/A	FOREBAY AQUIFER
KITZMILLER RD WS #01	2701574	N/A	N/A	FOREBAY AQUIFER
LUCERNE RD WS	2701900	N/A	N/A	FOREBAY AQUIFER
MAESTRI RANCH WS	2701110	N/A	N/A	FOREBAY AQUIFER
METZ RD WS #01	2701713	N/A	N/A	FOREBAY AQUIFER

Water System Name	ID	Connections	Population Served	Subbasin
METZ RD WS #02	2701209	N/A	N/A	FOREBAY AQUIFER
METZ RD WS #04	2701147	N/A	N/A	FOREBAY AQUIFER
METZ RD WS #06	2702016	N/A	N/A	FOREBAY AQUIFER
METZ RD WS #09	2701180	N/A	N/A	FOREBAY AQUIFER
MILE END RD WS #01	2700603	N/A	N/A	FOREBAY AQUIFER
MILE END RD WS #02	2702367	N/A	N/A	FOREBAY AQUIFER
MISSION RD WS #02	2702170	N/A	N/A	FOREBAY AQUIFER
MISSION RD WS #03	2702543	N/A	N/A	FOREBAY AQUIFER
MISSION RD WS #04	2702619	N/A	N/A	FOREBAY AQUIFER
MORISOLI RD WS	2701038	N/A	N/A	FOREBAY AQUIFER
PINE ST WS #03	2701916	N/A	N/A	FOREBAY AQUIFER
PRYOR FARMS INC WS	2702911	N/A	N/A	FOREBAY AQUIFER
RIVER RD WS #27	2702419	N/A	N/A	FOREBAY AQUIFER
RIVER RD WS #33	2702754	N/A	N/A	FOREBAY AQUIFER
SAN VICENTE RD WS #01	2700774	N/A	N/A	FOREBAY AQUIFER
THIRD ST WS #01	2701730	N/A	N/A	FOREBAY AQUIFER
UNDERWOOD RD WS #01	2702340	N/A	N/A	FOREBAY AQUIFER
VIDA RD WS #01	2702603	N/A	N/A	FOREBAY AQUIFER
WALNUT AVE WS #01	2701999	N/A	N/A	FOREBAY AQUIFER
WALNUT AVE WS #02	2702099	N/A	N/A	FOREBAY AQUIFER
AVERY LN WS #01	2701620	N/A	N/A	LANGLEY AREA
AVERY LN WS #02	2701834	N/A	N/A	LANGLEY AREA
AVERY LN WS #03	2702159	N/A	N/A	LANGLEY AREA
AVERY LN WS #04	2702580	N/A	N/A	LANGLEY AREA
BERTA CANYON WS #03	2700513	N/A	N/A	LANGLEY AREA
BERTA CANYON WS #04	2702570	N/A	N/A	LANGLEY AREA
BERTA CANYON WS #06	2700985	N/A	N/A	LANGLEY AREA
BERTA CANYON WS #07	2702167	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #04	2700517	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #06	2700843	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #07	2701524	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #08	2701555	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #09	2701594	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #10	2701607	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #11	2701651	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #15	2702218	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #16	2702139	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #17	2702142	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #19	2702341	N/A	N/A	LANGLEY AREA
BLACKIE RD WS #20	2701602	N/A	N/A	LANGLEY AREA
CASTROVILLE BLVD WS #01	2700524	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
CASTROVILLE BLVD WS #03	2700526	N/A	N/A	LANGLEY AREA
CASTROVILLE BLVD WS #04	2700527	N/A	N/A	LANGLEY AREA
CASTROVILLE BLVD WS #06	2700529	N/A	N/A	LANGLEY AREA
CASTROVILLE BLVD WS #09	2702385	N/A	N/A	LANGLEY AREA
CASTROVILLE BLVD WS #10	2702423	N/A	N/A	LANGLEY AREA
CASTROVILLE BLVD WS #11	2702463	N/A	N/A	LANGLEY AREA
CASTROVILLE BLVD WS #14	2702632	N/A	N/A	LANGLEY AREA
COKER RD WS #01	2700533	N/A	N/A	LANGLEY AREA
COKER RD WS #02	2701148	N/A	N/A	LANGLEY AREA
COKER RD WS #03	2702228	N/A	N/A	LANGLEY AREA
CRAZY HORSE WS #01	2700537	N/A	N/A	LANGLEY AREA
CRAZY HORSE WS #05	2702124	N/A	N/A	LANGLEY AREA
CRAZY HORSE WS #06	2701720	N/A	N/A	LANGLEY AREA
CRAZY HORSE WS #07	2702278	N/A	N/A	LANGLEY AREA
CRAZY HORSE WS #08	2702582	N/A	N/A	LANGLEY AREA
CROSS RD WS #01	2701509	N/A	N/A	LANGLEY AREA
CROSS RD WS #02	2701585	N/A	N/A	LANGLEY AREA
CROSS RD WS #03	2701771	N/A	N/A	LANGLEY AREA
CROSS RD WS #04	2701807	N/A	N/A	LANGLEY AREA
CROSS RD WS #05	2701818	N/A	N/A	LANGLEY AREA
CROSS RD WS #06	2701817	N/A	N/A	LANGLEY AREA
CROSS RD WS #08	2700951	N/A	N/A	LANGLEY AREA
CROSS RD WS #09	2701921	N/A	N/A	LANGLEY AREA
CROSS RD WS #10	2702095	N/A	N/A	LANGLEY AREA
CUNHA LN WS #01	2702126	N/A	N/A	LANGLEY AREA
DEL MONTE FARMS RD WS #09	2702054	N/A	N/A	LANGLEY AREA
DESMOND RD WS #01	2700545	N/A	N/A	LANGLEY AREA
DESMOND RD WS #02	2700546	N/A	N/A	LANGLEY AREA
DESMOND RD WS #05	2701571	N/A	N/A	LANGLEY AREA
DESMOND RD WS #06	2701644	N/A	N/A	LANGLEY AREA
DESMOND RD WS #08	2702109	N/A	N/A	LANGLEY AREA
DESMOND RD WS #09	2702117	N/A	N/A	LANGLEY AREA
DESMOND RD WS #10	2702207	N/A	N/A	LANGLEY AREA
DESMOND RD WS #11	2702536	N/A	N/A	LANGLEY AREA
DYER RD WS #02	2700550	N/A	N/A	LANGLEY AREA
DYER RD WS #03	2701559	N/A	N/A	LANGLEY AREA
DYER RD WS #04	2701610	N/A	N/A	LANGLEY AREA
DYER RD WS #05	2701646	N/A	N/A	LANGLEY AREA
DYER RD WS #06	2702618	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #01	2700553	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #02	2700554	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
ECHO VALLEY RD WS #03	2700555	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #04	2700556	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #06	2701893	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #07	2701210	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #08	2701424	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #09	2701235	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #10	2701425	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #11	2701556	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #12	2701640	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #13	2701642	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #14	2701662	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #15	2701749	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #18	2701808	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #19	2701914	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #22	2702234	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #25	2702400	N/A	N/A	LANGLEY AREA
ECHO VALLEY RD WS #26	2702417	N/A	N/A	LANGLEY AREA
EDEN LN WS #01	2701650	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #02	2700561	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #07	2700566	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #08	2700567	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #15	2700574	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #19	2701426	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #23	2701427	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #25	2702362	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #26	2701536	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #29	2701785	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #31	2701429	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #36	2701934	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #38	2702201	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #39	2702106	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #40	2702127	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #42	2702158	N/A	N/A	LANGLEY AREA
EL CAMINO REAL WS #48	2702808	N/A	N/A	LANGLEY AREA
EL DORO WS #01	2700576	N/A	N/A	LANGLEY AREA
ERMCO WATER SYSTEM	2702721	N/A	N/A	LANGLEY AREA
EXECUTIVE DR WS #01	2700583	N/A	N/A	LANGLEY AREA
FRISCH RD WS #01	2700584	N/A	N/A	LANGLEY AREA
FRISCH RD WS #02	2700588	N/A	N/A	LANGLEY AREA
HIDDEN VALLEY RD WS #13	2701534	N/A	N/A	LANGLEY AREA
HOLLY HILLS MOTEL WS #01	2700582	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
HOLLY HILLS MOTEL WS #02	2700604	N/A	N/A	LANGLEY AREA
HOLLY HILLS WS #01	2701141	N/A	N/A	LANGLEY AREA
HOLLY HILLS WS #02	2701979	N/A	N/A	LANGLEY AREA
HOLLY HILLS WS #03	2702424	N/A	N/A	LANGLEY AREA
HWY 156 WS #01	2701844	N/A	N/A	LANGLEY AREA
HWY 156 WS #02	2705582	N/A	N/A	LANGLEY AREA
JOSHUA LN WS	2701007	N/A	N/A	LANGLEY AREA
KING RD WS #01	2702288	N/A	N/A	LANGLEY AREA
KING RD WS #02	2702307	N/A	N/A	LANGLEY AREA
KING RD WS #03	2702313	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #01	2700617	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #02	2700618	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #03	2700619	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #04	2700620	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #05	2700621	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #06	2701440	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #08	2701243	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #09	2701244	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #10	2701762	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #12	2701437	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #13	2701908	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #15	2701441	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #16	2702346	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #17	2702232	N/A	N/A	LANGLEY AREA
LANGLEY CANYON WS #18	2702309	N/A	N/A	LANGLEY AREA
LAVENDER LN WS #01	2700623	N/A	N/A	LANGLEY AREA
LAVENDER LN WS #02	2701548	N/A	N/A	LANGLEY AREA
LINDA VISTA MWC	2701400	N/A	N/A	LANGLEY AREA
MAHER RD WS #04	2700637	N/A	N/A	LANGLEY AREA
MAHER RD WS #07	2701395	N/A	N/A	LANGLEY AREA
MAHER RD WS #09	2701883	N/A	N/A	LANGLEY AREA
MAHER RD WS #11	2702162	N/A	N/A	LANGLEY AREA
MAHER RD WS #14	2702281	N/A	N/A	LANGLEY AREA
MAHER RD WS #18	2701781	N/A	N/A	LANGLEY AREA
MAHER RD WS #21	2702301	N/A	N/A	LANGLEY AREA
MAHER RD WS #22	2702433	N/A	N/A	LANGLEY AREA
MAHER RD WS #23	2702447	N/A	N/A	LANGLEY AREA
MAHER RD WS #24	2702589	N/A	N/A	LANGLEY AREA
MAHER RD WS #25	2702683	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #01	2701917	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #02	2700640	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
MALLORY CANYON WS #03	2700641	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #04	2701637	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #05	2701448	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #07	2701840	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #08	2701546	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #09	2701723	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #10	2702114	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #11	2702435	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #12	2705586	N/A	N/A	LANGLEY AREA
MALLORY CANYON WS #20	2701137	N/A	N/A	LANGLEY AREA
MARJORIE RD WS	2700921	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #01	2700644	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #03	2701409	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #05	2701596	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #06	2702355	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #07	2702096	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #08	2701449	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #09	2701632	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #10	2702236	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #11	2701643	N/A	N/A	LANGLEY AREA
MCGUFFIE RD WS #12	2702160	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #02	2700646	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #03	2700647	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #04	2701091	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #06	2701451	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #07	2701494	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #08	2701502	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #10	2701875	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #11	2701135	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #12	2701664	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #13	2701919	N/A	N/A	LANGLEY AREA
MERIDIAN RD WS #14	2702092	N/A	N/A	LANGLEY AREA
MESSICK RD WS #01	2700649	N/A	N/A	LANGLEY AREA
MESSICK RD WS #02	2701953	N/A	N/A	LANGLEY AREA
MESSICK RD WS #03	2702112	N/A	N/A	LANGLEY AREA
MESSICK RD WS #04	2702459	N/A	N/A	LANGLEY AREA
MORO RD WS #01	2700657	N/A	N/A	LANGLEY AREA
MORO RD WS #02	2700658	N/A	N/A	LANGLEY AREA
MORO RD WS #03	2700659	N/A	N/A	LANGLEY AREA
MORO RD WS #04	2701925	N/A	N/A	LANGLEY AREA
MORO RD WS #06	2701238	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
MORO RD WS #07	2701454	N/A	N/A	LANGLEY AREA
MORO RD WS #08	2701453	N/A	N/A	LANGLEY AREA
MORO RD WS #10	2702357	N/A	N/A	LANGLEY AREA
MORO RD WS #13	2701528	N/A	N/A	LANGLEY AREA
MORO RD WS #15	2701764	N/A	N/A	LANGLEY AREA
MORO RD WS #16	2700744	N/A	N/A	LANGLEY AREA
MORO RD WS #17	2702725	N/A	N/A	LANGLEY AREA
MUSTANG WA	2701801	N/A	N/A	LANGLEY AREA
OAK ESTATES DR WS #01	2700661	N/A	N/A	LANGLEY AREA
OAK RD WS #01	2700666	N/A	N/A	LANGLEY AREA
OAKRIDGE DR WS #02	2702272	N/A	N/A	LANGLEY AREA
OLD STAGE RD WS #18	2702446	N/A	N/A	LANGLEY AREA
ORCHARD LN WS #01	2700668	N/A	N/A	LANGLEY AREA
ORCHARD LN WS #03	2700670	N/A	N/A	LANGLEY AREA
ORCHARD LN WS #04	2701387	N/A	N/A	LANGLEY AREA
ORCHARD LN WS #06	2701514	N/A	N/A	LANGLEY AREA
PARADISE RD WS #02	2700675	N/A	N/A	LANGLEY AREA
PARADISE RD WS #03	2700676	N/A	N/A	LANGLEY AREA
PARADISE RD WS #04	2700677	N/A	N/A	LANGLEY AREA
PARADISE RD WS #06	2700679	N/A	N/A	LANGLEY AREA
PARADISE RD WS #07	2700680	N/A	N/A	LANGLEY AREA
PARADISE RD WS #11	2701134	N/A	N/A	LANGLEY AREA
PARADISE RD WS #12	2701460	N/A	N/A	LANGLEY AREA
PARADISE RD WS #13	2701461	N/A	N/A	LANGLEY AREA
PARADISE RD WS #22	2701634	N/A	N/A	LANGLEY AREA
PARADISE RD WS #23	2701638	N/A	N/A	LANGLEY AREA
PARADISE RD WS #28	2701462	N/A	N/A	LANGLEY AREA
PARADISE RD WS #29	2701696	N/A	N/A	LANGLEY AREA
PARADISE RD WS #31	2702263	N/A	N/A	LANGLEY AREA
PARADISE RD WS #33	2702337	N/A	N/A	LANGLEY AREA
PESANTE RD WS #01	2701021	N/A	N/A	LANGLEY AREA
PESANTE RD WS #03	2700688	N/A	N/A	LANGLEY AREA
PESANTE RD WS #04	2700689	N/A	N/A	LANGLEY AREA
PESANTE RD WS #07	2700692	N/A	N/A	LANGLEY AREA
PESANTE RD WS #08	2701083	N/A	N/A	LANGLEY AREA
PESANTE RD WS #12	2700734	N/A	N/A	LANGLEY AREA
PESANTE RD WS #13	2701399	N/A	N/A	LANGLEY AREA
PESANTE RD WS #14	2700616	N/A	N/A	LANGLEY AREA
PESANTE RD WS #15	2701923	N/A	N/A	LANGLEY AREA
PESANTE RD WS #16	2701990	N/A	N/A	LANGLEY AREA
PESANTE RD WS #17	2702006	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
PESANTE RD WS #18	2701983	N/A	N/A	LANGLEY AREA
PESANTE RD WS #19	2702111	N/A	N/A	LANGLEY AREA
PESANTE RD WS #21	2701788	N/A	N/A	LANGLEY AREA
PESANTE RD WS #22	2702131	N/A	N/A	LANGLEY AREA
PESANTE RD WS #24	2707025	N/A	N/A	LANGLEY AREA
PESANTE RD WS #25	2702333	N/A	N/A	LANGLEY AREA
PESANTE RD WS #27	2702648	N/A	N/A	LANGLEY AREA
PESANTE RD WS #29	2702794	N/A	N/A	LANGLEY AREA
PEZZINI LN WS #01	2701392	N/A	N/A	LANGLEY AREA
PINE TREE WAY WS #01	2700695	N/A	N/A	LANGLEY AREA
PINE TREE WAY WS #02	2700696	N/A	N/A	LANGLEY AREA
PLAZA SERENA WS	2701636	N/A	N/A	LANGLEY AREA
POLLOCK LN WS #01	2700697	N/A	N/A	LANGLEY AREA
POLLOCK LN WS #02	2701129	N/A	N/A	LANGLEY AREA
POLLOCK LN WS #03	2700699	N/A	N/A	LANGLEY AREA
POLLOCK LN WS #04	2701088	N/A	N/A	LANGLEY AREA
POLLOCK LN WS #05	2702005	N/A	N/A	LANGLEY AREA
POLLOCK LN WS #06	2702051	N/A	N/A	LANGLEY AREA
POLLOCK LN WS #07	2702051	N/A	N/A	LANGLEY AREA
PRUNEDALE RD WS #02	2700704	N/A	N/A	LANGLEY AREA
PRUNEDALE RD WS #03	2701469	N/A	N/A	LANGLEY AREA
PRUNEDALE RD WS #04	2702360	N/A	N/A	LANGLEY AREA
PRUNEDALE RD WS #06	2702425	N/A	N/A	LANGLEY AREA
REESE CIR WS #01	2700712	N/A	N/A	LANGLEY AREA
REESE CIR WS #03	2702222	N/A	N/A	LANGLEY AREA
REESE CIR WS #04	2702591	N/A	N/A	LANGLEY AREA
SAN JUAN GRADE WS #03	2702775	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #02	2700739	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #06	2700743	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #08	2700745	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #13	2700750	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #18	2701680	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #20	2700767	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #26	2701474	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #29	2701501	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #30	2701506	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #31	2701530	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #37	2701988	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #38	2701567	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #39	2701962	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #43	2701674	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
SAN MIGUEL WS #44	2701715	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #45	2701748	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #49	2702120	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #54	2702420	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #59	2702599	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #62	2702690	N/A	N/A	LANGLEY AREA
SAN MIGUEL WS #64	2702731	N/A	N/A	LANGLEY AREA
SANDY HILL DR WS #01	2701787	N/A	N/A	LANGLEY AREA
STRAWBERRY RD WS #01	2700761	N/A	N/A	LANGLEY AREA
STRAWBERRY RD WS #03	2700763	N/A	N/A	LANGLEY AREA
STRAWBERRY RD WS #10	2700770	N/A	N/A	LANGLEY AREA
STRAWBERRY RD WS #22	2702389	N/A	N/A	LANGLEY AREA
STRONG CIR WS	2702264	N/A	N/A	LANGLEY AREA
TARAWILD CT WS #01	2701657	N/A	N/A	LANGLEY AREA
TIMEVIEW WAY WS #01	2702504	N/A	N/A	LANGLEY AREA
TUCKER RD WS #01	2701554	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #01	2700776	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #02	2700777	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #03	2700778	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #04	2701484	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #05	2701380	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #07	2702380	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #08	2700569	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #09	2701366	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #10	2701485	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #14	2701591	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #15	2701724	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #16	2701767	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #17	2701728	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #18	2701970	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #19	2701992	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #20	2702177	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #21	2702178	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #22	2702260	N/A	N/A	LANGLEY AREA
TUSTIN RD WS #23	2702415	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #01	2700780	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #02	2700781	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #03	2700782	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #04	2700783	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #05	2700784	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #09	2702168	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
VALLE PACIFICO WS #11	2702379	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #12	2702025	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #14	2702152	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #15	2702470	N/A	N/A	LANGLEY AREA
VALLE PACIFICO WS #16	2702695	N/A	N/A	LANGLEY AREA
VIA DEL SOL WS #01	2701652	N/A	N/A	LANGLEY AREA
VIA DEL SOL WS #02	2700814	N/A	N/A	LANGLEY AREA
VIA DEL SOL WS #03	2702153	N/A	N/A	LANGLEY AREA
VIA DEL SOL WS #04	2702499	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #01	2701719	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #02	2700791	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #04	2700793	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #05	2700794	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #06	2700795	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #07	2700796	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #08	2701119	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #09	2701488	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #10	2701512	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #11	2701531	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #12	2701532	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #13	2701533	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #14	2700667	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #15	2701565	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #16	2701601	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #17	2701611	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #18	2701617	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #20	2701660	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #21	2701895	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #23	2701725	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #24	2701747	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #27	2701401	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #28	2700722	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #32	2702129	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #33	2702169	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #34	2702249	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #35	2702402	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #36	2702489	N/A	N/A	LANGLEY AREA
VIERRA CANYON WS #37	2702429	N/A	N/A	LANGLEY AREA
WILD HORSE WS #01	2701933	N/A	N/A	LANGLEY AREA
WILD PINTO WS #01	2701795	N/A	N/A	LANGLEY AREA
WILD PINTO WS #02	2701913	N/A	N/A	LANGLEY AREA

Water System Name	ID	Connections	Population Served	Subbasin
WILDER CT WS #01	2702287	N/A	N/A	LANGLEY AREA
CATTLEMEN RD WS #01	2701677	N/A	N/A	UPPER VALLEY AQUIFER
DELICATO VINEYARD WS	2702538	N/A	N/A	UPPER VALLEY AQUIFER
INDIAN VALLEY RD WS #01	2702547	N/A	N/A	UPPER VALLEY AQUIFER
LOS LOBOS RD WS	2701693	N/A	N/A	UPPER VALLEY AQUIFER
MESA VERDE RD WS #01	2701741	N/A	N/A	UPPER VALLEY AQUIFER
MONTEREY-DIXIE WS	2701960	N/A	N/A	UPPER VALLEY AQUIFER
NACIMIENTO LAKE DR WS #01	2701936	N/A	N/A	UPPER VALLEY AQUIFER
RANCHITA CANYON RD WS #01	2705555	N/A	N/A	UPPER VALLEY AQUIFER
SARGENTS RD WS #01	2701710	N/A	N/A	UPPER VALLEY AQUIFER
SARGENTS RD WS #03	2701710	N/A	N/A	UPPER VALLEY AQUIFER
SPRECKELS RD WS - KING CITY	2702075	N/A	N/A	UPPER VALLEY AQUIFER
TEAGUE AVE WS #04	2702465	N/A	N/A	UPPER VALLEY AQUIFER
TOPO RANCH WS	2701162	N/A	N/A	UPPER VALLEY AQUIFER
VINEYARD CANYON WS	2701930	N/A	N/A	UPPER VALLEY AQUIFER

Table 2. Public Water Systems (15 < connections or serving more than 25 peoplefor at least 60 days out of the year)

Water System Name	PWSID	Connections	Population Served	Subbasin	State Water System Classification
ALBA WS	CA2702572	4	40	EASTSIDE AQUIFER	NC
ALCO WATER SERVICE	CA2710001	9,272	29,179	EASTSIDE AQUIFER	C
ALTMAN PLANTS WS #01	CA2700856	5	45	EASTSIDE AQUIFER	NTNC
ALTMAN PLANTS WS #02	CA2702616	3	25	EASTSIDE AQUIFER	NTNC
ASSISI MWC	CA2700503	42	126	EASTSIDE AQUIFER	C
CAL AM WATER COMPANY - RALPH LANE WS	CA2702004	30	66	EASTSIDE AQUIFER	C
COLOR SPOT NURSERY WS #01	CA2700853	4	200	EASTSIDE AQUIFER	NTNC
COLOR SPOT NURSERY WS #02	CA2702482	1	25	EASTSIDE AQUIFER	NTNC
CWSC FOOTHILL ESTATES	CA2702198	45	183	EASTSIDE AQUIFER	C
CWSC SALINAS	CA2710010	24,036	106,858	EASTSIDE AQUIFER	C
EL CAMINO WC INC	CA2702409	31	90	EASTSIDE AQUIFER	C
ENCINAL RD WS #01	CA2701241	18	41	EASTSIDE AQUIFER	C
ESPERANZA RD WS	CA2702615	1	160	EASTSIDE AQUIFER	NTNC
FOOTHILL ESTATES WS	CA2702198	61	183	EASTSIDE AQUIFER	C
FREE WILL BAPTIST CHURCH WS	CA2702475	2	80	EASTSIDE AQUIFER	NC
GABILAN WC	CA2700586	162	454	EASTSIDE AQUIFER	C

Water System Name	PWSID	Connections	Population Served	Subbasin	State Water System Classification
GREEN VALLEY FLORAL WS	CA2701151	1	25	EASTSIDE AQUIFER	NTNC
GROWERS COMPANY INC WS	CA2702202	6	200	EASTSIDE AQUIFER	NTNC
HARRISON RD WS #01	CA2700592	4	40	EASTSIDE AQUIFER	NTNC
IVERSON & JACKS APTS WS	CA2701068	31	150	EASTSIDE AQUIFER	C
IVERSON RD WS #03	CA2702621	1	40	EASTSIDE AQUIFER	NTNC
JOHNSON CYN WS #01	CA2702626	8	28	EASTSIDE AQUIFER	NTNC
LHOIST NORTH AMERICA WS	CA2702259	1	100	EASTSIDE AQUIFER	NTNC
MATSUI NURSERY WS	CA2701931	2	75	EASTSIDE AQUIFER	NTNC
MISIONERO VEGETABLES WS	CA2701946	3	60	EASTSIDE AQUIFER	NTNC
NATIVIDAD RD WS #02	CA2701922	3	35	EASTSIDE AQUIFER	NTNC
OLD NATIVIDAD RD WS #01	CA2701232	3	25	EASTSIDE AQUIFER	NC
PENTECOSTAL WS	CA2700558	1	25	EASTSIDE AQUIFER	NTNC
PREMIUM PACKING WS	CA2702537	1	5	EASTSIDE AQUIFER	NC
ROSEHART INDUSTRIAL PARK WS	CA2702121	13	28	EASTSIDE AQUIFER	NTNC
SAN JERARDO COOP WS	CA2701904	67	249	EASTSIDE AQUIFER	C
SPENCE RD WS #05	CA2701726	4	25	EASTSIDE AQUIFER	NTNC
SUNNY ACRES MWS	CA2701589	15	45	EASTSIDE AQUIFER	C
APPLE AVE WS #02	CA2701034	18	75	FOREBAY AQUIFER	C
APPLE AVE WS #03	CA2701036	20	60	FOREBAY AQUIFER	C
ARROYO SECO ESTATES MWS	CA2702520	20	70	FOREBAY AQUIFER	C
CAMPHORA APARTMENTS	CA2701046	42	126	FOREBAY AQUIFER	C
CAMPHORA STATION WS	CA2701579	5	25	FOREBAY AQUIFER	NTNC
CAMPHORA-GLORIA RD WS #01	CA2702642	2	25	FOREBAY AQUIFER	NC
CORRECTIONAL TRAINING FACILITY - SOLEDAD	CA2710850	2,769	5,500	FOREBAY AQUIFER	C
DOLE FRESH VEGETABLES WS	CA2702412	1	80	FOREBAY AQUIFER	NTNC
ESTANCIA WINERY WS	CA2702613	1	70	FOREBAY AQUIFER	NTNC
FOOTHILL RD WS #01	CA2702431	4	25	FOREBAY AQUIFER	NTNC
GOLDEN STATE VINTNERS WS	CA2701550	1	30	FOREBAY AQUIFER	NTNC
GONZALES, CITY OF	CA2710007	1,930	8,383	FOREBAY AQUIFER	C
GREENFIELD, CITY OF	CA2710008	3,720	17,517	FOREBAY AQUIFER	C
KENDALL-JACKSON WINERY WS	CA2702496	2	45	FOREBAY AQUIFER	NTNC
MCCOY RD WS #05	CA2701040	24	72	FOREBAY AQUIFER	C
MISSION SCHOOL WS	CA2702317	1	100	FOREBAY AQUIFER	NTNC
OAK PARK WS	CA2700999	1	29	FOREBAY AQUIFER	NC
OASIS CAFE WS	CA2701000	5	31	FOREBAY AQUIFER	NC

Water System Name	PWSID	Connections	Population Served	Subbasin	State Water System Classification
PARADISE RD WS #21	CA2701633	16	48	FOREBAY AQUIFER	C
PARAISO HOT SPRINGS WS	CA2701001	5	25	FOREBAY AQUIFER	NC
PINE ST WS #01	CA2701403	17	65	FOREBAY AQUIFER	C
SALINAS VALLEY STATE PRISON	CA2710851	2,208	3,386	FOREBAY AQUIFER	C
SAN SABA WINERY WS	CA2702609	2	29	FOREBAY AQUIFER	NC
SAN VICENTE MWC	CA2702466	21	90	FOREBAY AQUIFER	C
SOLEDAD MISSION WS	CA2701176	2	25	FOREBAY AQUIFER	NC
SOLEDAD, CITY OF	CA2710011	3,669	16,729	FOREBAY AQUIFER	C
AMERICAN LEGION #593 WS	CA2702679	2	25	LANGLEY AREA	NC
BLACKIE RD WS #05	CA2700837	18	54	LANGLEY AREA	C
BLACKIE RD WS #18	CA2702094	21	60	LANGLEY AREA	C
CABANA HOLIDAY WS	CA2700522	146	400	LANGLEY AREA	C
CALVARY CHURCH INC WS	CA2700703	5	150	LANGLEY AREA	NTNC
CENTRAL BAY HIGH SCHOOL WS	CA2702490	1	250	LANGLEY AREA	NTNC
CHETMOORE ACRES WA	CA2700634	24	50	LANGLEY AREA	C
COLONIAL OAK WC INC	CA2700534	66	198	LANGLEY AREA	C
COUNTRY MEADOWS MWC	CA2701929	107	621	LANGLEY AREA	C
COUNTRYSIDE ESTATES MWC	CA2702374	18	73	LANGLEY AREA	C
CWSC COUNTRY MEADOWS	CA2701929	107	294	LANGLEY AREA	C
CWSC OAK HILLS	CA2710019	894	3,904	LANGLEY AREA	C
ECHO VALLEY RD WS #05	CA2701423	16	48	LANGLEY AREA	C
ECHO VALLEY SCHOOL WS	CA2700552	1	579	LANGLEY AREA	NTNC
GARLEN COURT WS	CA2700686	23	69	LANGLEY AREA	C
GLENN AVE WS #01	CA2700589	26	78	LANGLEY AREA	C
HIDDEN CANYON RANCH MWC	CA2702554	27	102	LANGLEY AREA	C
HIDDEN VALLEY WA	CA2700594	31	51	LANGLEY AREA	C
HOLLY HILLS MWC	CA2701789	27	108	LANGLEY AREA	C
LA TAPATIA TAQUERIA WS	CA2702382	1	25	LANGLEY AREA	NC
LANGLEY/VALLE PACIFICO WS	CA2701670	31	81	LANGLEY AREA	C
MAHER RD WS #05	CA2700638	17	51	LANGLEY AREA	C
MANZANITA PARK WS	CA2702229	1	300	LANGLEY AREA	NC
MERIDIAN RD WS #09	CA2701837	2	35	LANGLEY AREA	NTNC
MONTEREY BAY NURSERY WS	CA2702336	3	25	LANGLEY AREA	NTNC
MONTEREY DUNES MWA	CA2701452	137	280	LANGLEY AREA	C
MONTEREY MUSHROOMS WS	CA2701940	1	450	LANGLEY AREA	NTNC
MORO COJO MWA	CA2700656	19	67	LANGLEY AREA	C

Water System Name	PWSID	Connections	Population Served	Subbasin	State Water System Classification
MORO RD WS #09	CA2701926	65	210	LANGLEY AREA	C
NORMCO	CA2700511	267	928	LANGLEY AREA	C
OAK HEIGHTS W & R CO INC	CA2700665	35	105	LANGLEY AREA	C
OAK MANOR WS	CA2700509	28	71	LANGLEY AREA	C
ORCHARD LN WS #02	CA2700669	16	32	LANGLEY AREA	C
ORCHARD LN WS #09	CA2702165	5	25	LANGLEY AREA	NC
PAJARO/SUNNY MESA COMMUNITY SERVICES DISTRICT	CA2710020	457	6,500	LANGLEY AREA	C
PARADISE RD WS #05	CA2700678	15	42	LANGLEY AREA	C
PARADISE RD WS #09	CA2700682	18	250	LANGLEY AREA	C
PESANTE RD WS #02	CA2700687	40	120	LANGLEY AREA	C
PESANTE RD WS #06	CA2700691	16	48	LANGLEY AREA	C
POND-DEROSA OAKS WC	CA2701553	72	216	LANGLEY AREA	C
PRUNEDALE CHEVRON WS	CA2701630	1	25	LANGLEY AREA	NC
PRUNEDALE MWC	CA2700702	84	252	LANGLEY AREA	C
PRUNEDALE PLAZA WS	CA2701814	11	90	LANGLEY AREA	NC
PRUNEDALE SCHOOL WS	CA2700705	1	400	LANGLEY AREA	NTNC
PRUNEDALE SHOPPING CENTER WS	CA2701231	1	150	LANGLEY AREA	NTNC
PRUNETREE SHOPPING CENTER WS	CA2702368	38	200	LANGLEY AREA	NTNC
RANCHO BORROMEO MWS	CA2700709	36	100	LANGLEY AREA	C
ROLLING HILLS RANCHO WA	CA2700713	59	177	LANGLEY AREA	C
ROYAL OAK PLACE WS	CA2702388	20	60	LANGLEY AREA	C
ROYAL OAKS PARK WS	CA2700636	1	25	LANGLEY AREA	NC
SALINAS TRANSPLANT WS	CA2702021	1	58	LANGLEY AREA	NC
SAN MIGUEL WS #01	CA2700738	34	100	LANGLEY AREA	C
SAN MIGUEL WS #03	CA2700740	16	48	LANGLEY AREA	C
SAN MIGUEL WS #22	CA2702073	31	93	LANGLEY AREA	C
SPRING CANYON WA	CA2700838	33	99	LANGLEY AREA	C
SUMMERHILL MHP WS	CA2700792	34	102	LANGLEY AREA	C
THIMIO MWC	CA2702608	21	60	LANGLEY AREA	C
VIERRA CANYON WS #29	CA2701942	2	25	LANGLEY AREA	NC
VIERRA ESTATES WS	CA2702007	53	164	LANGLEY AREA	C
VIERRA KNOLLS MWC	CA2702055	22	66	LANGLEY AREA	C
VIERRA MEADOWS MWC	CA2702003	25	75	LANGLEY AREA	C
WOODLAND HEIGHTS MWC	CA2702439	19	57	LANGLEY AREA	C
AERA ENERGY LLC WS	CA2701187	1	75	UPPER VALLEY AQUIFER	NTNC

Water System Name	PWSID	Connections	Population Served	Subbasin	State Water System Classification
BERNARDO RD WS #02	CA2702486	3	25	UPPER VALLEY AQUIFER	NC
BRADLEY UNION SCHOOL WS	CA2700964	1	100	UPPER VALLEY AQUIFER	NTNC
CALIFORNIA ORCHARD WS	CA2701742	50	150	UPPER VALLEY AQUIFER	C
CAMP ROBERTS - CALIFORNIA NATIONAL GUARD	CA2710705	342	385	UPPER VALLEY AQUIFER	NTNC
CHEVRON OIL FIELD WS	CA2701171	1	75	UPPER VALLEY AQUIFER	NTNC
CWSC KING CITY	CA2710009	2,778	14,441	UPPER VALLEY AQUIFER	C
LITTLE BEAR WATER COMPANY	CA2710016	705	2,303	UPPER VALLEY AQUIFER	C
SAN ARDO WD	CA2700728	162	550	UPPER VALLEY AQUIFER	C
SAN LUCAS WD	CA2701676	96	500	UPPER VALLEY AQUIFER	C
SCHEID VINEYARD WS	CA2702539	1	45	UPPER VALLEY AQUIFER	NTNC
WILDHORSE CAFE WS	CA2701172	6	50	UPPER VALLEY AQUIFER	NTNC

Chapter 3
Appendix 3-B

Land Use Plans

APPENDIX 3-B. LAND USE PLANS IN THE SUBBASIN

3-A (a) Monterey County General Plan

Relevant elements of the Monterey County General Plan (Monterey County, 2010) are summarized in Table 3-3.

Table 3-1 Monterey County General Plan Summary

Element	Goal / Policy	
Land Use	LU-1.4	Growth areas shall be designated only where an adequate level of services and facilities such as water, sewerage, fire and police protection, transportation, and schools exist or can be assured concurrent with growth and development. Phasing of development shall be required as necessary in growth areas in order to provide a basis for long-range services and facilities planning.
Open Space	OS-3.8	The County shall cooperate with appropriate regional, state and federal agencies to provide public education/outreach and technical assistance programs on erosion and sediment control, efficient water use, water conservation and re-use, and groundwater management. This cooperative effort shall be centered through the Monterey County Water Resources Agency.
et seq. Public Services	GOAL PS-2	Assure an adequate and safe water supply to meet the county's current and long-term needs.
	PS-2.1	Coordination among, and consolidation with, those public water service providers drawing from a common water table to prevent overdrawing the water table is encouraged.
	PS-2.2	The County of Monterey shall assure adequate monitoring of wells in those areas experiencing rapid growth provided adequate funding mechanisms for monitoring are established in the CIFP.
	PS-2.3	New development shall be required to connect to existing water service providers where feasible. Connection to public utilities is preferable to other providers.
	PS-2.4	Regulations for installing any new domestic well located in consolidated materials (e.g., hard rock areas) shall be enacted by the County.
	PS-2.5	Regulations shall be developed for water quality testing for new individual domestic wells on a single lot of record to identify: a) Water quality testing parameters for a one-time required water quality test for individual wells at the time of well construction. b) A process that allows the required one-time water quality test results to be available to future owners of the well. Regulations pursuant to this policy shall not establish criteria that will prevent the use of the well in the development of the property. Agricultural wells shall be exempt from the regulation.
	GOAL PS-3	Ensure that new development is assured a long-term sustainable water supply.

Element	Goal / Policy	
	PS-3.1	Except as specifically set forth below, new development for which a discretionary permit is required, and that will use or require the use of water, shall be prohibited without proof, based on specific findings and supported by evidence, that there is a long-term, sustainable water supply, both in quality and quantity to serve the development [see Plan for list].
	PS-3.2	Specific criteria for proof of a Long-Term Sustainable Water Supply and an Adequate Water Supply System for new development requiring a discretionary permit, including but not limited to residential or commercial subdivisions, shall be developed by ordinance with the advice of the General Manager of the Water Resources Agency and the Director of the Environmental Health Bureau. A determination of a Long-Term Sustainable Water Supply shall be made upon the advice of the General Manager of the Water Resources Agency. The following factors shall be used in developing the criteria for proof of a long-term sustainable water supply and an adequate water supply system: [see Plan for list]
	PS-3.3	Specific criteria shall be developed by ordinance for use in the evaluation and approval of adequacy of all domestic wells. The following factors shall be used in developing criteria for both water quality and quantity including, but not limited to: [see Plan for list]
	PS-3.4	The County shall request an assessment of impacts on adjacent wells and instream flows for new high-capacity wells, including high-capacity urban and agricultural production wells, where there may be a potential to affect existing adjacent domestic or water system wells adversely or in-stream flows, as determined by the Monterey County Water Resources Agency. In the case of new high-capacity wells for which an assessment shows the potential for significant adverse well interference, the County shall require that the proposed well site be relocated or otherwise mitigated to avoid significant interference. The following factors shall be used in developing criteria by ordinance for use in the evaluation and approval of adequacy of all such high-capacity wells, including but not limited to: a) Effect on wells in the immediate vicinity as required by the Monterey County Water Resources Agency or Environmental Health Bureau. b) Effects of additional extractions or diversion of water on in-stream flows necessary to support riparian vegetation, wetlands, fish, and other aquatic life including migration potential for steelhead, for the purpose of minimizing impacts to those resources and species. This policy is not intended to apply to replacement wells.
	PS-3.5	The Monterey County Health Department shall not allow construction of any new wells in known areas of saltwater intrusion as identified by Monterey County Water Resources Agency or other applicable water management agencies: a) Until such time as a program has been approved and funded that will minimize or avoid expansion of saltwater intrusion into useable groundwater supplies in that area; or b) Unless approved by the applicable water resource agency. This policy shall not apply to deepening or replacement of existing wells, or wells used in conjunction with a desalination project.
	PS-3.6	The County shall coordinate and collaborate with all agencies responsible for the management of existing and new water resources.

Element		Goal / Policy
	PS-3.7	A program to eliminate overdraft of water basins shall be developed as part of the Capital Improvement and Financing Plan (CIFP) for this Plan using a variety of strategies, which may include but are not limited to: a) Water banking; b) Groundwater and aquifer recharge and recovery; c) Desalination; d) Pipelines to new supplies; and/or e) A variety of conjunctive use techniques. The CIFP shall be reviewed every five years in order to evaluate the effectiveness of meeting the strategies noted in this policy. Areas identified to be at or near overdraft shall be a high priority for funding.
	PS-3.8	Developments that use gray water and cisterns for multi-family residential and commercial landscaping shall be encouraged, subject to a discretionary permit.
	PS-3.9	A tentative subdivision map and/or vesting tentative subdivision map application for either a standard or minor subdivision shall not be approved until the applicant provides evidence of a long-term sustainable water supply in terms of yield and quality for all lots that are to be created through subdivision.
	PS-3.10	In order to maximize agricultural water conservation measures to improve water use efficiency and reduce overall water demand, the County shall establish an ordinance identifying conservation measures that reduce agricultural water demand.
	PS-3.11	In order to maximize urban water conservation measures to improve water use efficiency and reduce overall water demand, the County shall establish an ordinance identifying conservation measures that reduce potable water demand
	PS-3.12	The County shall maximize the use of recycled water as a potable water offset to manage water demands and meet regulatory requirements for wastewater discharge, by employing strategies including, but not limited to, the following: a) Increase the use of treated water where the quality of recycled water is maintained, meets all applicable regulatory standards, is appropriate for the intended use, and re-use will not significantly impact beneficial uses of other water resources. b) Work with the agricultural community to develop new uses for tertiary recycled water and increase the use of tertiary recycled water for irrigation of lands currently being irrigated by groundwater pumping. c) Work with urban water providers to emphasize use of tertiary recycled water for irrigation of parks, playfields, schools, golf courses, and other landscape areas to reduce potable water demand. d) d. Work with urban water providers to convert existing potable water customers to tertiary recycled water as infrastructure and water supply become available.
	PS-3.13	To ensure accuracy and consistency in the evaluation of water supply availability, the Monterey County Health Department, in coordination with the MCWRA, shall develop guidelines and procedures for conducting water supply assessments and determining water availability. Adequate availability and provision of water supply, treatment, and conveyance facilities shall be assured to the satisfaction of the County prior to approval

Element		Goal / Policy
		of final subdivision maps or any changes in the General Plan Land Use or Zoning designations.
	PS-3.14	The County will participate in regional coalitions for the purpose of identifying and supporting a variety of new water supply projects, water management programs, and multiple agency agreements that will provide additional domestic water supplies for the Monterey Peninsula and Seaside basin, while continuing to protect the Salinas and Pajaro River groundwater basins from saltwater intrusion. The County will also participate in regional groups including representatives of the Pajaro Valley Water Management Agency and the County of Santa Cruz to identify and support a variety of new water supply, water management and multiple agency agreement that will provide additional domestic water supplies for the Pajaro Groundwater Basin. The County's general objective, while recognizing that timeframes will be dependent on the dynamics of each of the regional groups, will be to complete the cooperative planning of these water supply alternatives within five years of the adoption of the General Plan and to implement the selected alternatives within five years after that time.
	PS-3.15	The County will pursue expansion of the Salinas Valley Water Project (SVWP) by investigating expansion of the capacity for the Salinas River water storage and distribution system. This shall also include, but not be limited to, investigations of expanded conjunctive use, use of recycled water for groundwater recharge and seawater intrusion barrier, and changes in operations of the reservoirs. The County's overall objective is to have an expansion planned and in service by the date that the extractions from the Salinas Valley groundwater basin are predicted to reach the levels estimated for 2030 in the EIR for the Salinas Valley Water Project. The County shall review these extraction data trends at five-year intervals. The County shall also assess the degree to which the Salinas Valley Groundwater Basin (Zone 2C) has responded with respect to water supply and the reversal of seawater intrusion based upon the modeling protocol utilized in the Salinas Valley Water Project EIR. If the examination indicates that the growth in extractions predicted for 2030 are likely to be attained within ten years of the date of the review, or the groundwater basin has not responded with respect to water supply and reversal of seawater intrusion as predicted by the model, then the County shall convene and coordinate a working group made up of the Salinas Valley cities, the MCWRA, and other affected entities. The purpose will be to identify new water supply projects, water management programs, and multiple agency agreements that will provide additional domestic water supplies for the Salinas Valley. These may include, but not be limited to, expanded conjunctive use programs, further improvements to the upriver reservoirs, additional pipelines to provide more efficient distribution, and expanded use of recycled water to reinforce the hydraulic barrier against seawater intrusion. The county's objective will be to complete the cooperative planning of these water supply alternatives within five years and to have the projects on-line five years following identification of water supply alternatives.

The Monterey County General Plan does not include population projections; however, the Association of Monterey Bay Area Governments (AMBAG) has developed population projections through 2050, as shown in Table 3-4.

Table 3-2. Monterey County Population Projections
(AMBAG, 2018)

Geography	2015	2020	2025	2030	2035	2040	Change 2015-2040	
							Numeric	Percent
AMBAG Region	**762,676**	**791,600**	**816,900**	**840,100**	**862,200**	**883,300**	**120,624**	**16%**
Monterey County	**432,637**	**448,211**	**462,678**	**476,588**	**489,451**	**501,751**	**69,114**	**16%**
Carmel-By-The-Sea	3,824	3,833	3,843	3,857	3,869	3,876	52	1%
Del Rey Oaks	1,655	1,949	2,268	2,591	2,835	2,987	1,332	80%
Gonzales	8,411	8,827	10,592	13,006	15,942	18,756	10,345	123%
Greenfield	16,947	18,192	19,425	20,424	21,362	22,327	5,380	32%
King City	14,008	14,957	15,574	15,806	15,959	16,063	2,055	15%
Marina	20,496	23,470	26,188	28,515	29,554	30,510	10,014	49%
Marina balance	19,476	20,957	22,205	22,957	23,621	24,202	4,726	24%
CSUMB (portion)	1,020	2,513	3,983	5,558	5,933	6,308	5,288	518%
Monterey	28,576	28,726	29,328	29,881	30,460	30,976	2,400	8%
Monterey balance	24,572	24,722	25,324	25,877	26,456	26,972	2,400	10%
DLI & Naval Postgrad	4,004	4,004	4,004	4,004	4,004	4,004	0	0%
Pacific Grove	15,251	15,349	15,468	15,598	15,808	16,138	887	6%
Salinas	159,486	166,303	170,824	175,442	180,072	184,599	25,113	16%
Sand City	376	544	710	891	1,190	1,494	1,118	297%
Seaside	34,185	34,301	35,242	36,285	37,056	37,802	3,617	11%
Seaside balance	26,799	27,003	27,264	27,632	28,078	28,529	1,730	6%
Fort Ord (portion)	4,450	4,290	4,340	4,490	4,690	4,860	410	9%
CSUMB (portion)	2,936	3,008	3,638	4,163	4,288	4,413	1,477	86%
Soledad	24,809	26,399	27,534	28,285	29,021	29,805	4,996	20%
Soledad balance	16,510	18,100	19,235	19,986	20,722	21,506	4,996	30%
SVSP & CTF	8,299	8,299	8,299	8,299	8,299	8,299	0	0%
Balance Of County	104,613	105,361	105,682	106,007	106,323	106,418	1,805	2%
San Benito County	**56,445**	**62,242**	**66,522**	**69,274**	**72,064**	**74,668**	**18,223**	**32%**
Hollister	36,291	39,862	41,685	43,247	44,747	46,222	9,931	27%
San Juan Bautista	1,846	2,020	2,092	2,148	2,201	2,251	405	22%
Balance Of County	18,308	20,360	22,745	23,879	25,116	26,195	7,887	43%
Santa Cruz County	**273,594**	**281,147**	**287,700**	**294,238**	**300,685**	**306,881**	**33,287**	**12%**
Capitola	10,087	10,194	10,312	10,451	10,622	10,809	722	7%
Santa Cruz	63,830	68,381	72,091	75,571	79,027	82,266	18,436	29%
Santa Cruz balance	46,554	49,331	51,091	52,571	54,027	55,266	8,712	19%
UCSC	17,276	19,050	21,000	23,000	25,000	27,000	9,724	56%
Scotts Valley	12,073	12,145	12,214	12,282	12,348	12,418	345	3%
Watsonville	52,562	53,536	55,187	56,829	58,332	59,743	7,181	14%
Balance Of County	135,042	136,891	137,896	139,105	140,356	141,645	6,603	5%

Sources: Data for 2015 are from the U.S. Census Bureau and California Department of Finance. Forecast years were prepared by AMBAG and PRB.

3-A (b) City of Salinas General Plan

The Land Use and Conservation/Open Space Elements of the City of Salinas General Plan (City of Salinas, 2002) are relevant to water resources within the Eastside Aquifer Subbasin, and are summarized in Table 3-5.

Table 3-3. City of Salinas General Plan Summary
(City of Salinas, 2002)

Element	Goal / Policy	
Land Use	Goal LU-6	Work with water suppliers and distributors such as Cal Water and Alco to continue to provide quality water supply and treatment capacity to meet community needs.
	Policy LU-6.1	Actively work with Cal Water and Alco, as well as regional water suppliers and distributors, to ensure that high quality water is available for the community.
	Policy LU-6.2	Review development proposals to ensure that adequate water supplies, treatment, and distribution capacity is available to meet the needs of the development without negatively impacting the existing community,
	Policy LU-6.3	Participate in and support regional programs and projects that target the improvement and conservation of the region's groundwater and surface water supply.
	Policy LU-6.4	Actively promote water conservation by City residents, businesses, and surrounding agricultural producers.
	Policy LU-6.5	Review projects subject, such as residential projects with 500 or more units, for compliance with Section 10910-10915 of the California Water Code.
Conservation	Goal COS-1	Provide a safe and adequate water supply for community uses.
	Policy COS-1.1	Work with regional and local water providers to ensure that adequate supplies of water are available to meet existing and future demand.
	Policy COS-1.2	Cooperate with local, regional, and state water agencies to develop new water sources.
	Policy COS-1.3	Work with local and regional water providers to increase the production, distribution, and use of recycled water,
	Policy COS-1.4	Maintain and restore natural watersheds to recharge the aquifers and ensure the viability of the ground water resources.
	Policy COS-1.5	Cooperate with the Monterey County Water Resources Agency, the State Water Resources Control Board and the Regional Water Quality Control Board to implement programs that address the two primary causes of poor water quality in the planning area: salt water intrusion and nitrate contamination.
	Policy COS-1.6	Enforce national (NPDES) requirements and participate in regional efforts to protect and enhance water quality.
	Goal COS-2	Encourage the conservation of water resources.
	Policy COS-2.1	Participate in and implement local and regional programs that promote water conservation.
	Policy COS-2.2	Work with water providers to institute conservation programs to address water supply problems caused by groundwater overdrafting,
	Policy COS-2.3	Apply standards that promote water conservation in agricultural, residential and non-residential uses.
	Policy COS-2.4	Enforce the City's Water Conservation Ordinance.

3-A (c) City of Gonzales General Plan

Relevant elements of the City of Gonzales General Plan (City of Gonzales, 2011) are summarized in Table 3-6.

Table 3-4. City of Gonzales General Plan Summary
(City of Gonzales, 2011)

Element	Goal / Policy	
Land Use	LU-1.2.2	New developments must have adequate water supplies.
	LU-8.3.1:	Modify proposed designs for industrial development to reduce adverse environmental impacts, particularly noise, air, and water pollution, odor, soil, and groundwater contamination, traffic, and visual blight to the degree practicable.
	LU-8.3.2	Plan for Sewer and Water Expansion. Ensure that adequate water and sewer capacity is available to support all areas designated for industrial development
Housing	HE-9.2	Promote Water Conservation. Promote the use of water-saving devices, drought-tolerant landscaping, and other water conservation measures to achieve a reduction in home water bills for residential customers
	HE-9.4.1	Water Conservation. The City will continue to promote ways to reduce monthly home water bills. Such measures already include: (a) requiring new houses to utilize low-flow toilets, low-flow shower heads, and low flow faucets consistent with the requirements of the Monterey County Water Resources Agency, and (b) requiring the use of drought-tolerant landscaping within new developments (as specified in the State Model Landscape Ordinance). The City will also support new water retrofitting programs undertaken by the Monterey County Water Resources Agency, such as providing free low-flow plumbing fixtures to existing customers in Gonzales. Responsibility: Building Department, Public Works Department, Planning Department Timing: Ongoing
Community Health and Safety	Community Health and Safety Element, Paragraph H Water Quality	Groundwater and surface water quality both affect the health of Gonzales residents. Because groundwater is the sole source of domestic water in Gonzales, a healthful supply is essential to the city's future. Surface water pollution creates negative aesthetic and environmental impacts, as well as creating potential health hazards locally and downstream. The Community Health and Safety Element includes policies to reduce the extent of water pollution that could occur from urban development in Gonzales, as well as policies to minimize potential risks if contamination does occur. The groundwater beneath Gonzales is vulnerable to contamination from lawn fertilizer, leaking underground storage tanks, failing septic systems, animal waste, and naturally occurring minerals. High nitrate levels are a persistent problem in the Salinas Valley, with about half of the 58 wells sampled exceeding the State water standard over a testing period of about 30 years. Nitrate problems around Gonzales are most prevalent on the northeast side of the Planning Area, where former greenhouse and dairy operations and the existing feed lot are probably the primary contaminant sources. Elsewhere in the Planning Area, groundwater quality is generally acceptable and meets all water quality standards. The Gonzales Public Works Department conducts regular measurements of water quality for city wells and takes corrective actions if nitrate levels exceed acceptable standards. In the past, well water quality problems have been addressed with special seals which block nitrates from entering the water supply. If activities and land uses around the wells are not properly managed in the future, contamination could result. This would require that wells be relocated or that well-head treatment be introduced.

References

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Chapter 4
Appendix 4-A

ISW Seasonality Analysis

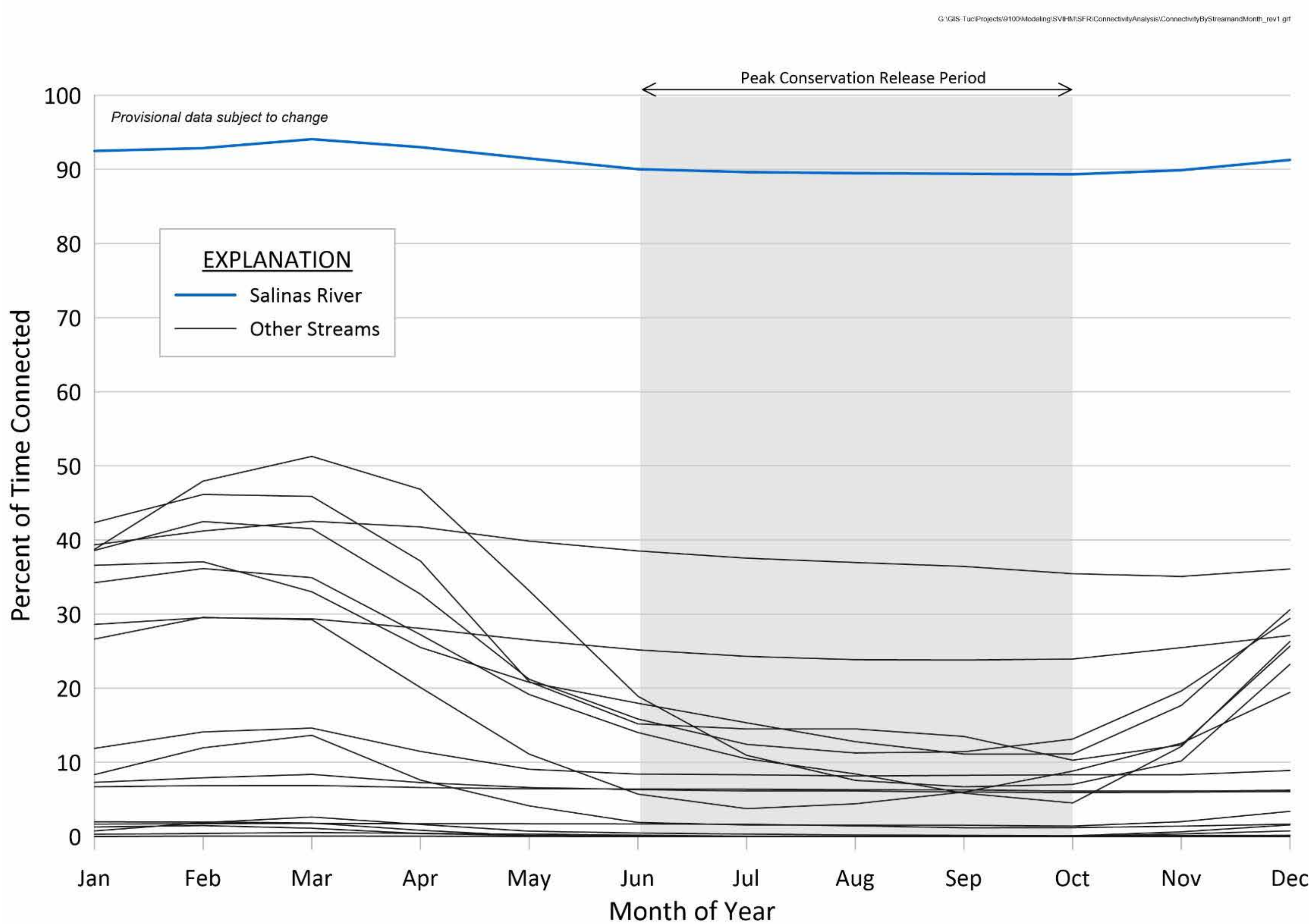
Appendix 4a. ISW Seasonality Analysis

Surface water and groundwater can be hydrologically connected along a stream reach during some months of the year and not others. These temporal variations of interconnected surface water (ISW) during a given year are the result of variations in recharge, precipitation, groundwater pumping, and riparian evapotranspiration. Along the Salinas River, monthly changes in reservoir operations also influence ISW reaches. Hydrologic connectivity in the Salinas Valley is estimated using results from the provisional SVIHM. Along the Salinas River, the timing of reservoir releases is used to determine the months that the ISW sustainable management criteria applies since releases during the peak conservation period (June through September) are intended for groundwater recharge. The ISW delineated along the Salinas River in section 4.4.5.1 of the GSP represent reaches that are connected during a majority (greater than 50%) of months during the non-peak conservation release period (October through May) over the full SVIHM simulation period from 1967 to 2017. However, model results indicate that the ISW length along the Salinas River is virtually the same throughout the year, connected the vast majority of time.

For tributaries or streams away from the Salinas River, reservoir releases have less impact on ISW, if any, than for the Salinas River. To estimate the seasonal variability of ISW for stream reaches away from the Salinas River, a monthly analysis. These locations are the best estimates of where persistent hydrologic connections occur along streams in the Salinas Valley. However, the lateral extents (lengths) of these reaches vary from month to month during the year, as well as from year to year.

To understand whether surface water is connected to groundwater only during certain months, a monthly analysis was undertaken. The monthly analysis produces 2 pieces of information for each month of the year: (1) the average percent of years simulated by the SVIHM that a stream has hydrologic connection, based on the average monthly connectivity of every model grid cell identified as ISW along the stream, and (2) the average extent of where hydrologic connection occurs. Figure 1 shows the average percent of time when connectivity occurs at any location along a given stream in Salinas Valley. These data show the average temporal connectivity along the entire length of a stream; however, some reaches of the stream have much lower or higher connectivity then indicated by the average values. The results on Figure 1 are most useful for identifying the seasonal trends of connectivity for streams. Tributaries to the river and streams away from the river show seasonal variation in connectivity, with higher average connectivity in the Winter and Spring months and lower average connectivity in the Summer months.

Consistent with the seasonal variations in average time of connectivity, the lengths of ISW along the streams away from the Salinas River are generally longest during the late Winter and Spring months and shortest during the late Summer months. The average ISW length varies during the year in the Langley Area Subbasin and along Arroyo Seco in Forebay Subbasin, with the locations of ISW in 4.4.5.1 representing the stream reaches with more consistent connection. The lengths of average ISW away from Salinas River in Upper Valley vary very little, if at all, during the year. The average monthly variations and extents are based on results from the provisional SVIHM and are subject to change in future updates to the GSP as additional data increases the understanding regarding ISW extents.

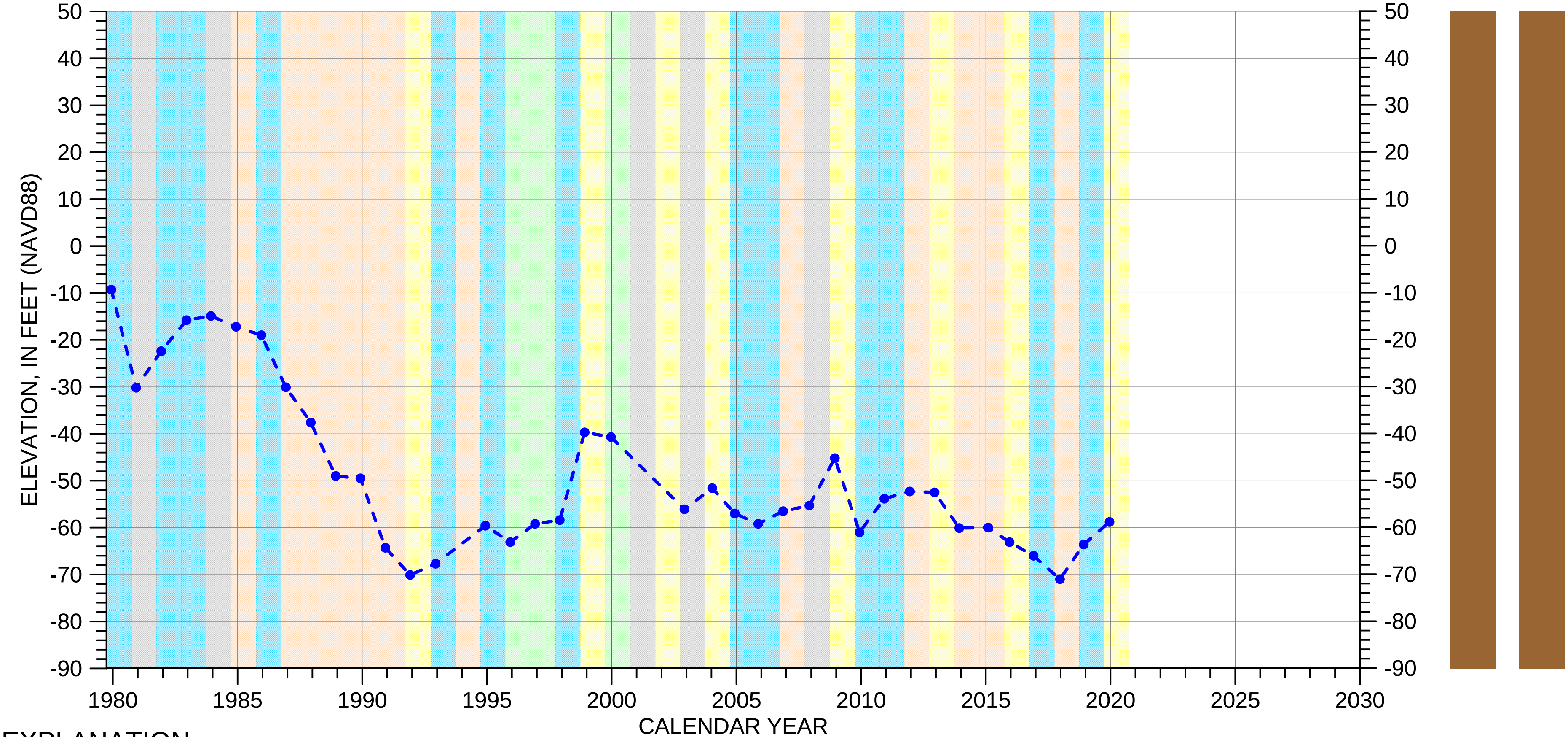

Peak Conservation Release Period
Provisional data subject to change
EXPLANATION
Salinas River
Other Streams
Percent of Time Connected
100
90
80
70
60
50
40
30
20
10
0
Jan
Feb
Mar
Apr
May
Jun
Jul
Aug
Sep
Oct
Nov
Dec
Month of Year

Chapter 5
Appendix 5-A

Hydrographs

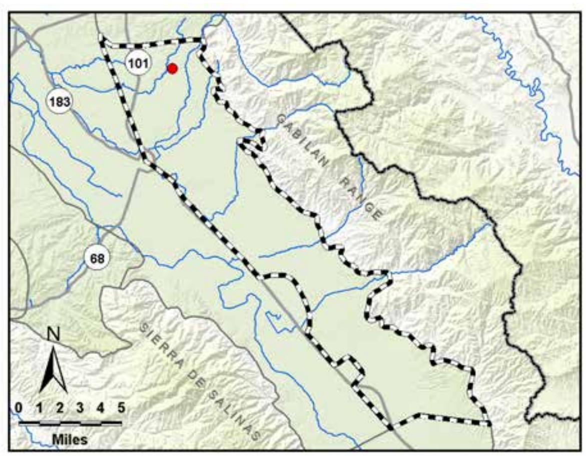
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-03K01

Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (169 FT MSL)



Perforated interval unknown

Well bottom
-499 feet msl

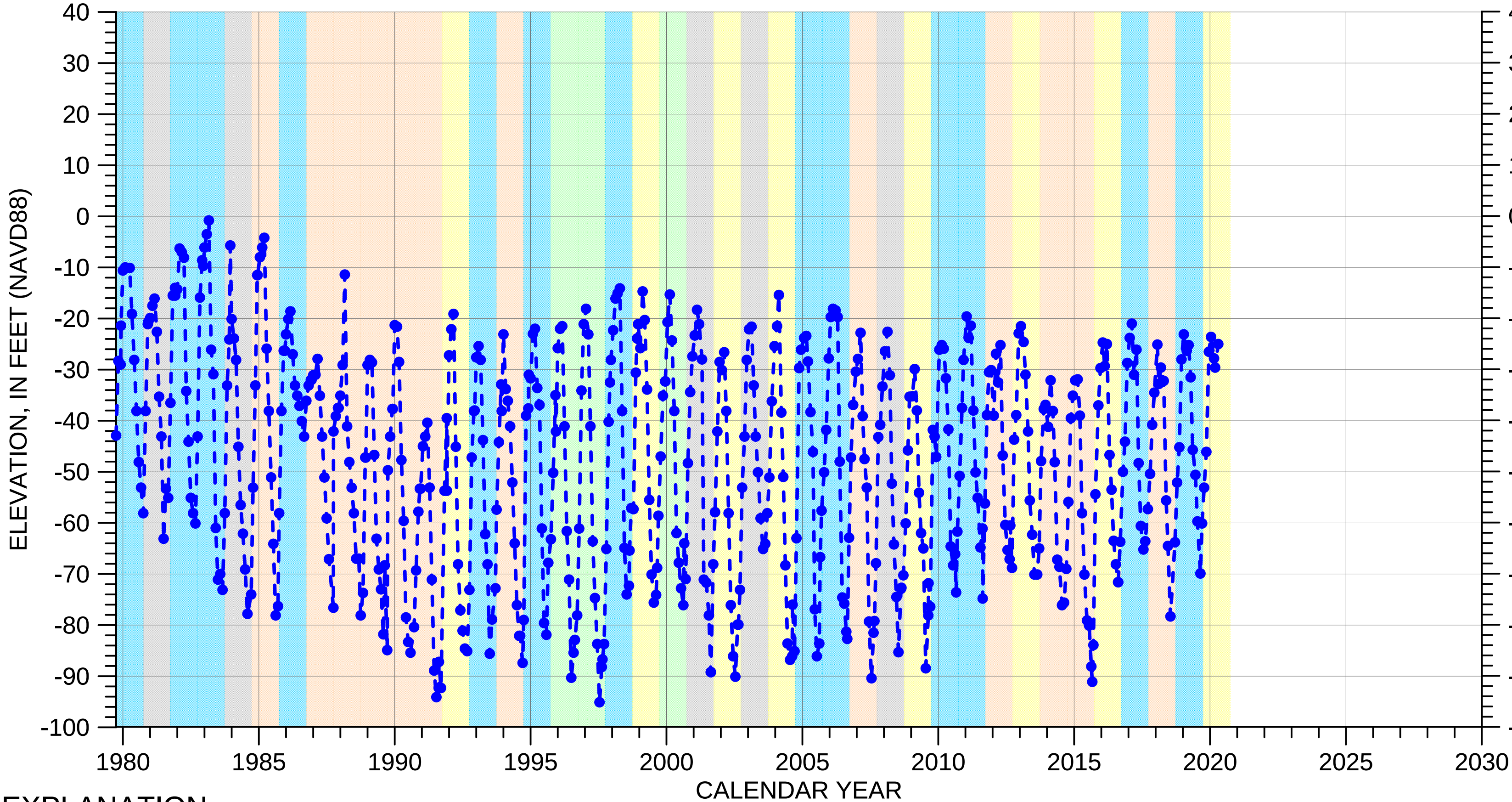
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Plot20 *

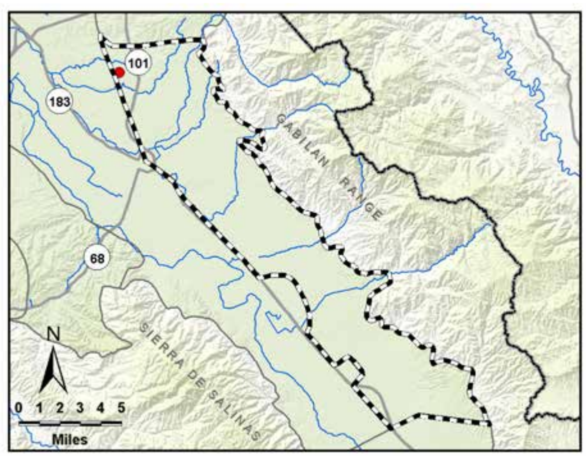
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-06R01

Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (92 FT MSL)



Perforated interval unknown

Well bottom
-293 feet msl

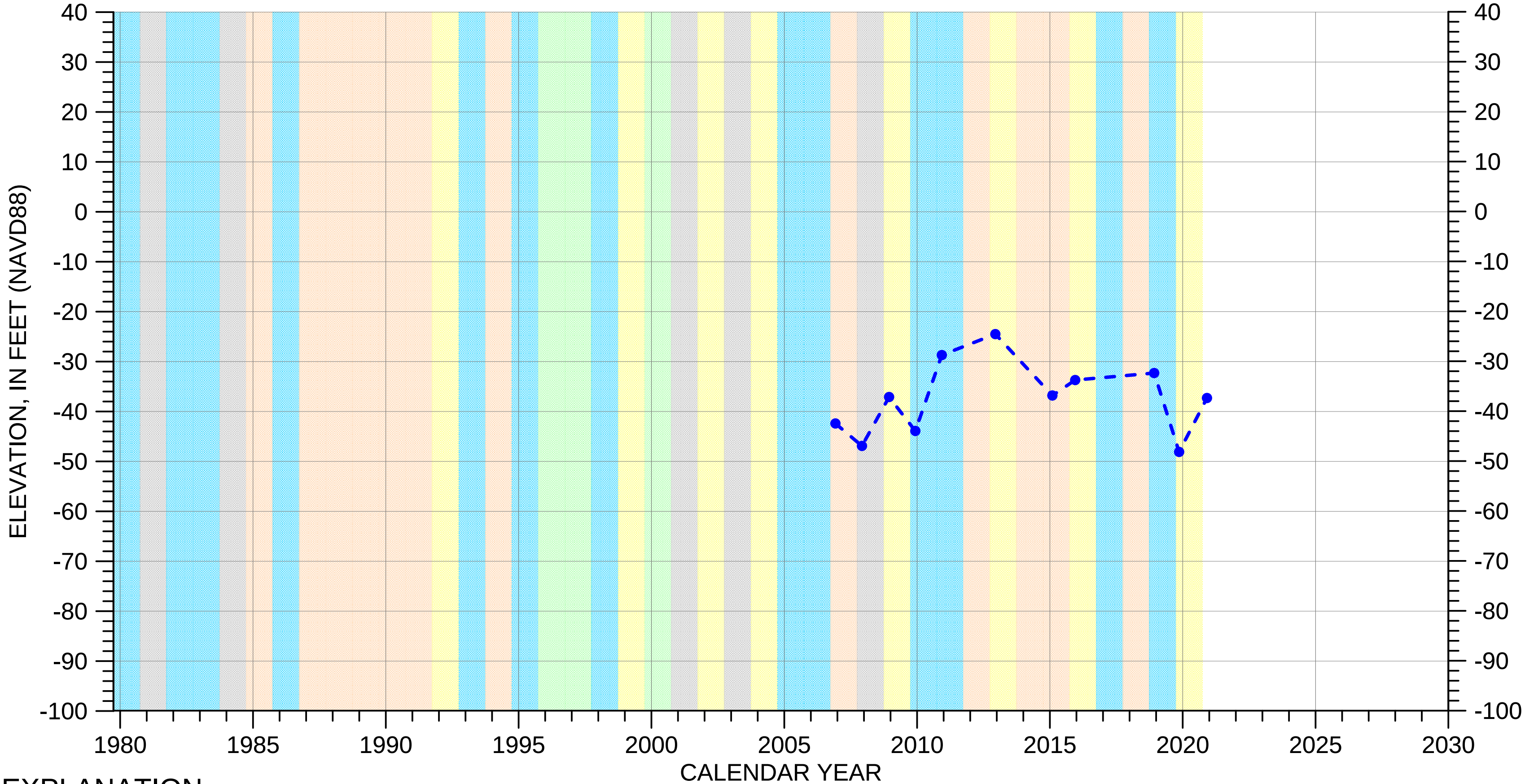
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Plot21 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-08C01

Eastside Aquifer Subbasin

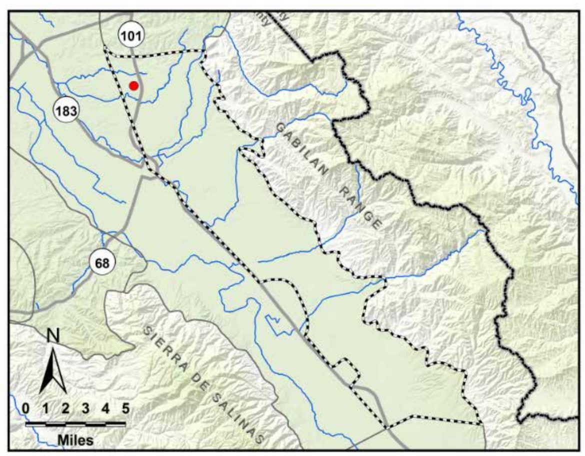


EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (110 FT MSL)



Perforated interval unknown

Well bottom -675.5 feet msl

WATER YEAR TYPE DESIGNATION

DRY

DRY - NORMAL

NORMAL

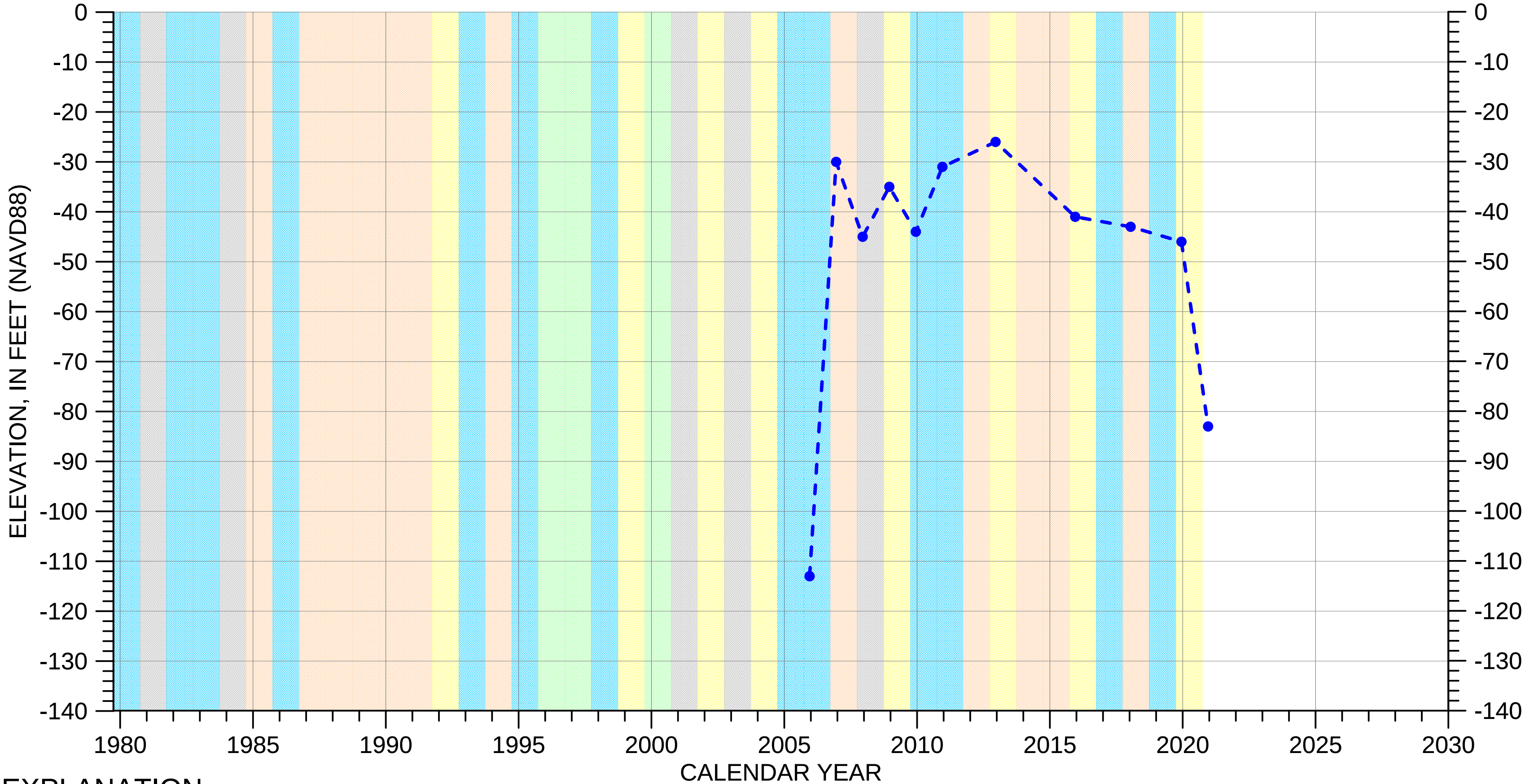
WET - NORMAL

WET

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Old ISP\Chapter_5\Hydrographs\GRFs_Ch8\14S_03E-08C01.grf

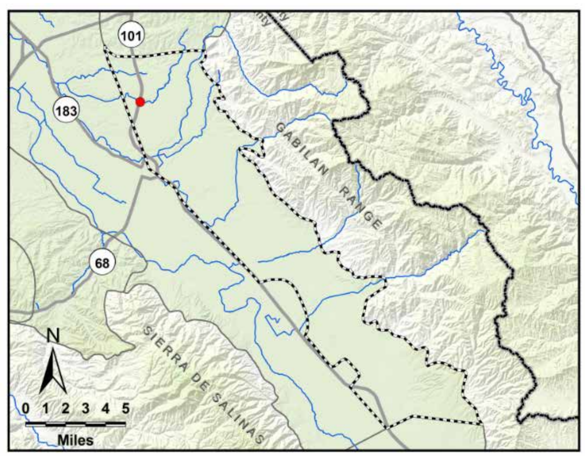
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-08Q03

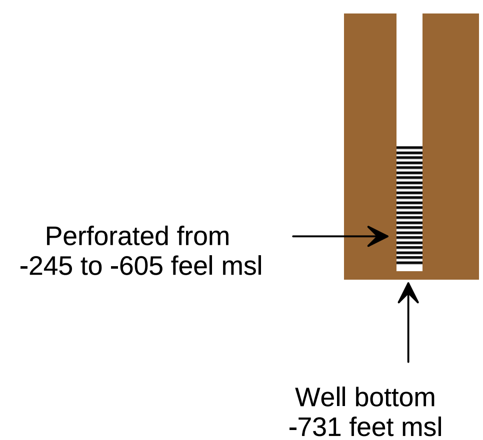
Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (75 FT MSL)





WATER YEAR TYPE DESIGNATION

DRY	WET - NORMAL
DRY - NORMAL	WET
NORMAL	

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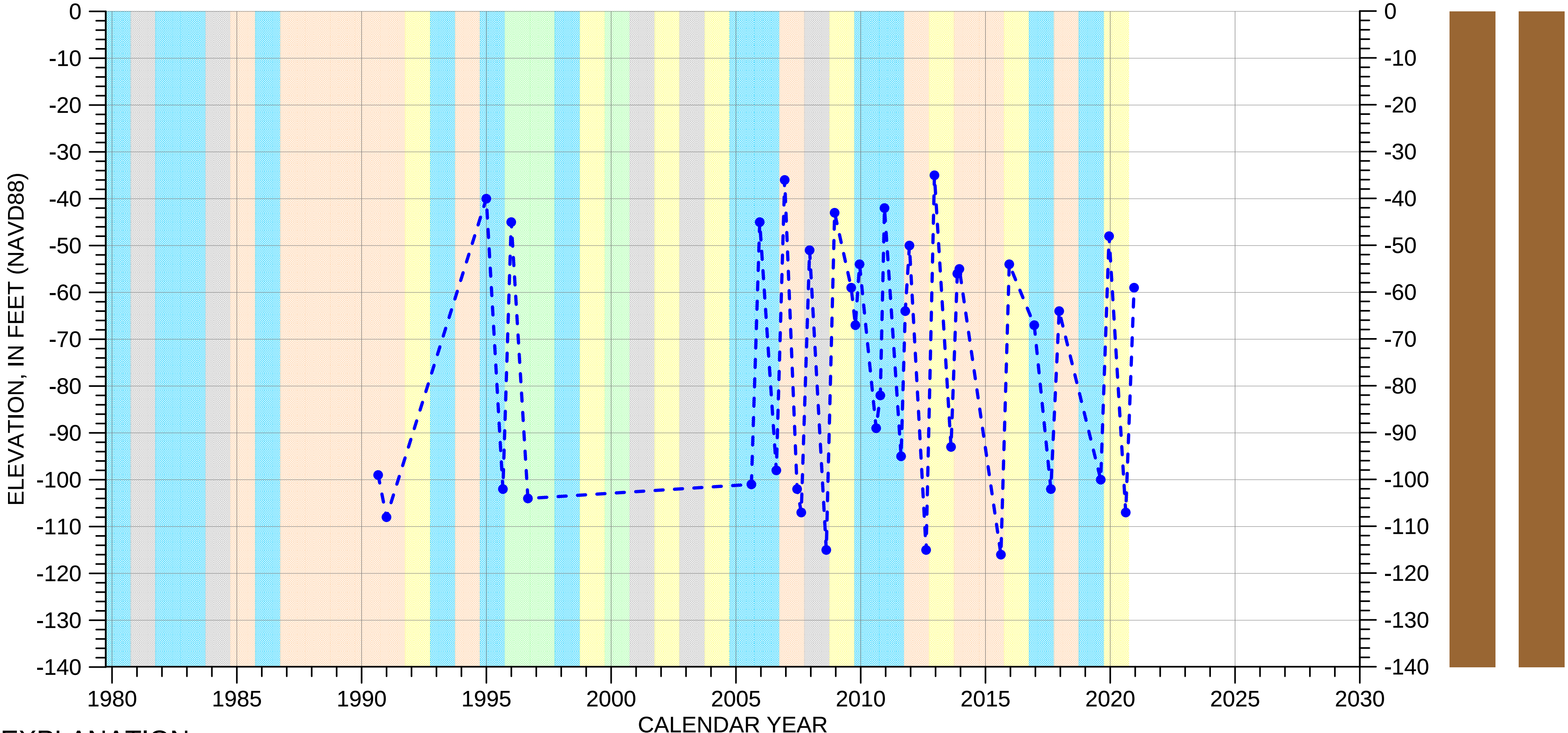
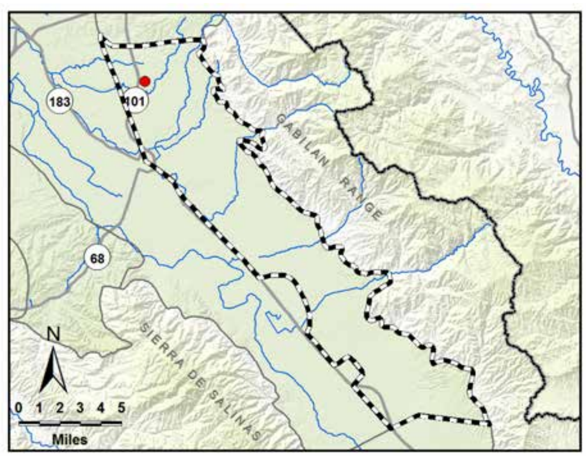
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-09E02

Eastside Aquifer Subbasin



EXPLANATION

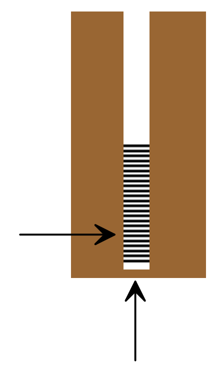
- Groundwater Elevation
- Suspect Measurement
- Land Surface (121 FT MSL)



WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Perforated from
-189 to -509 feet msl

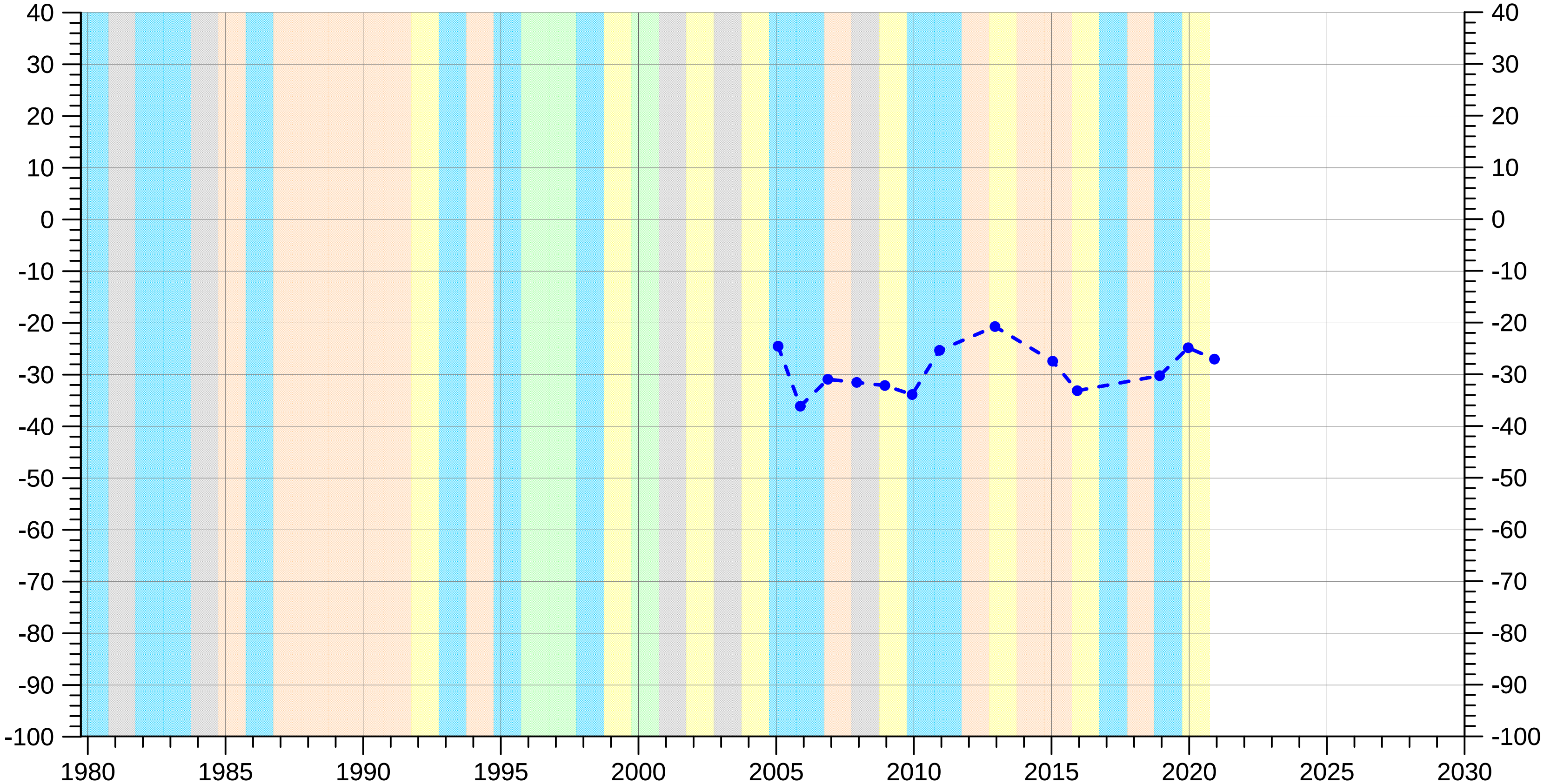


Well bottom
-529 feet msl

Plot22 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-09P02

Eastside Aquifer Subbasin



EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (115 FT MSL)

WATER YEAR TYPE DESIGNATION

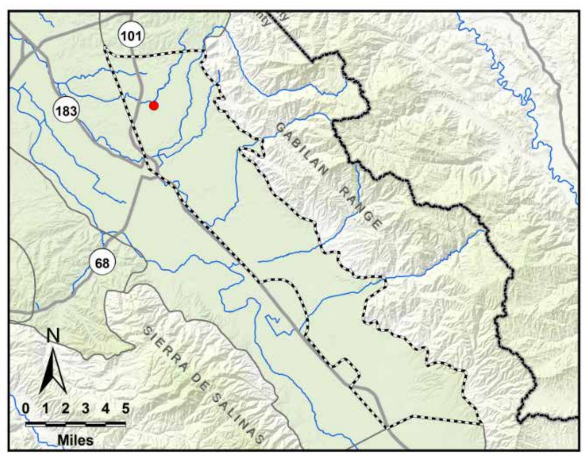
DRY

DRY - NORMAL

NORMAL

WET - NORMAL

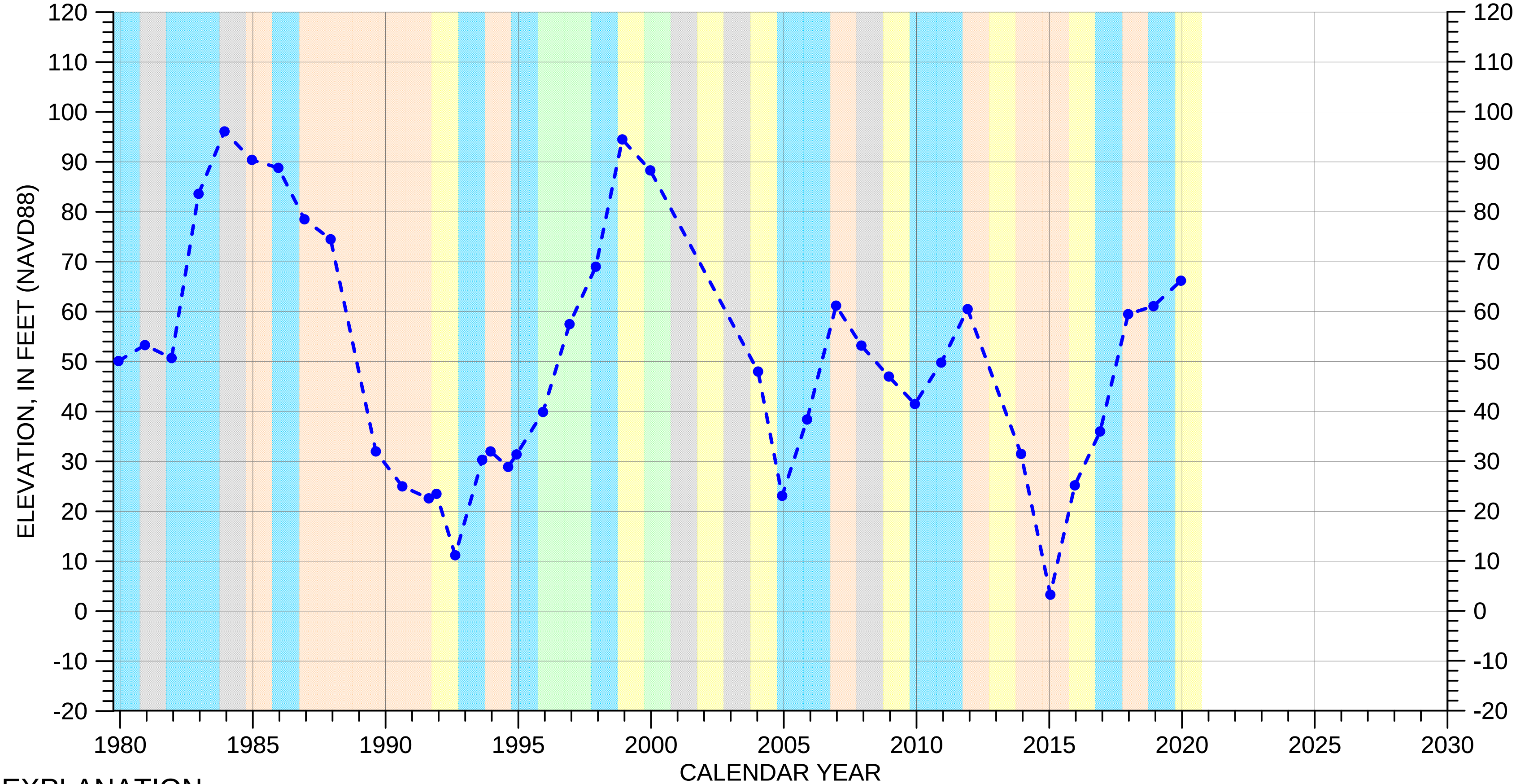
WET



\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Old ISP\Chapter_5\Hydrographs\GRFs_Ch8\14S_03E-09P02.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-11H01

Eastside Aquifer Subbasin

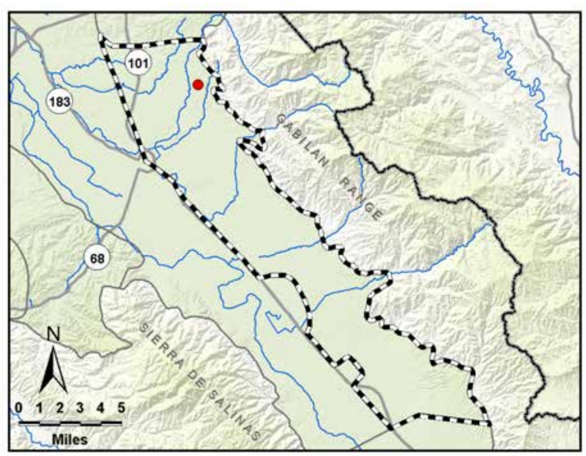


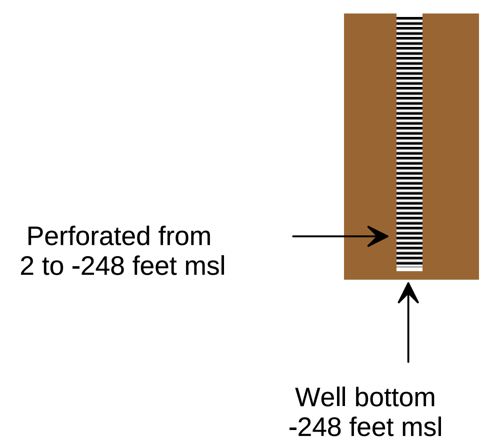
EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (142 FT MSL)





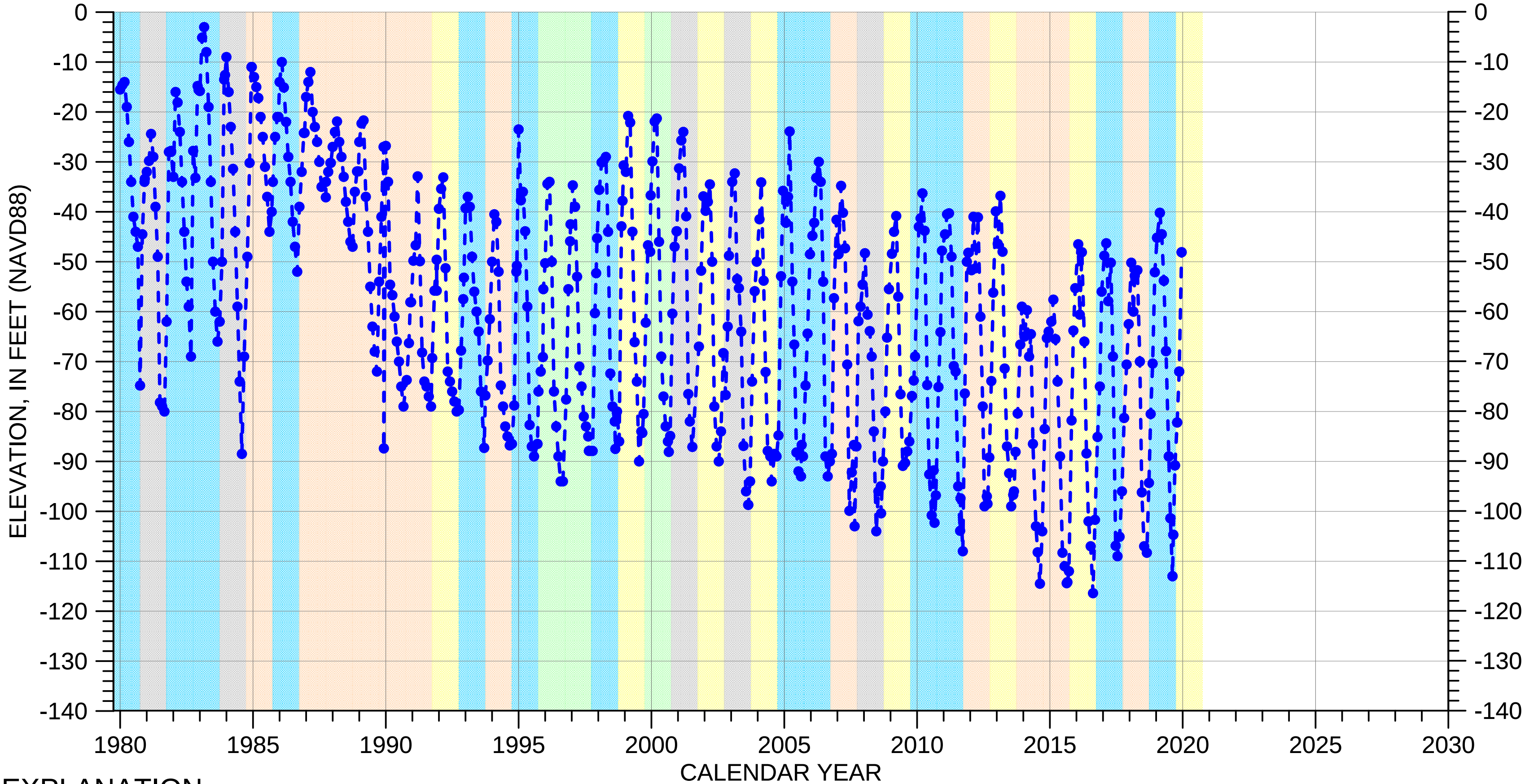
WATER YEAR TYPE DESIGNATION

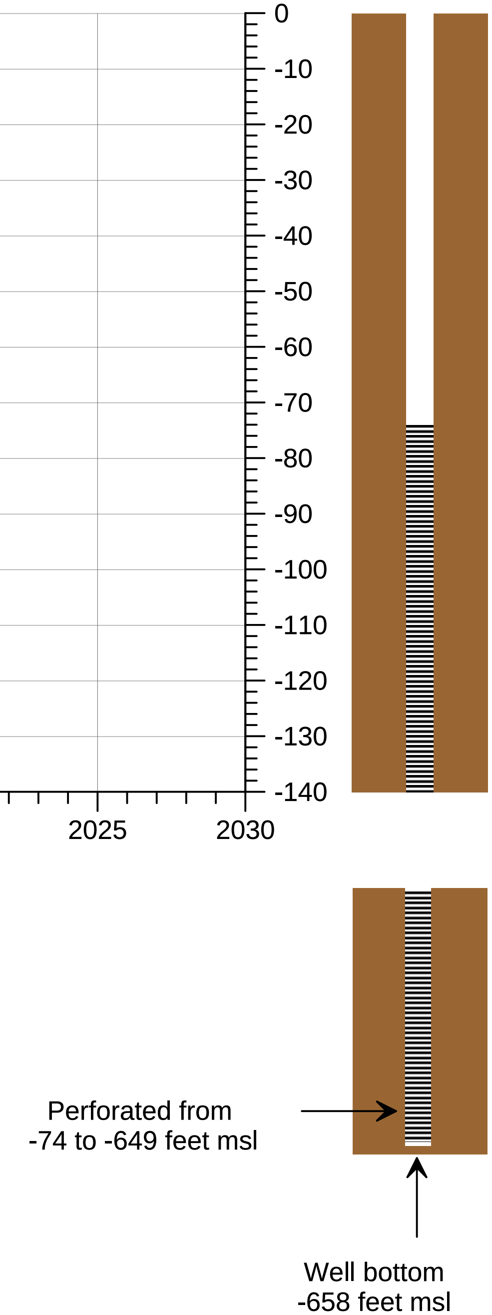
DRY
DRY - NORMAL
NORMAL
WET - NORMAL
WET

Plot23 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-15H03

Eastside Aquifer Subbasin



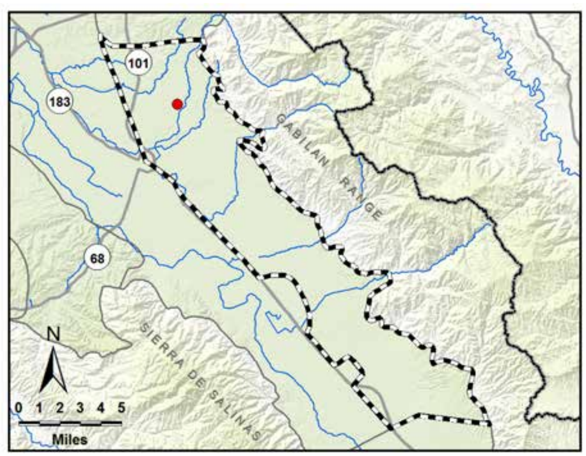


EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (126 FT MSL)



WATER YEAR TYPE DESIGNATION

DRY

DRY - NORMAL

NORMAL

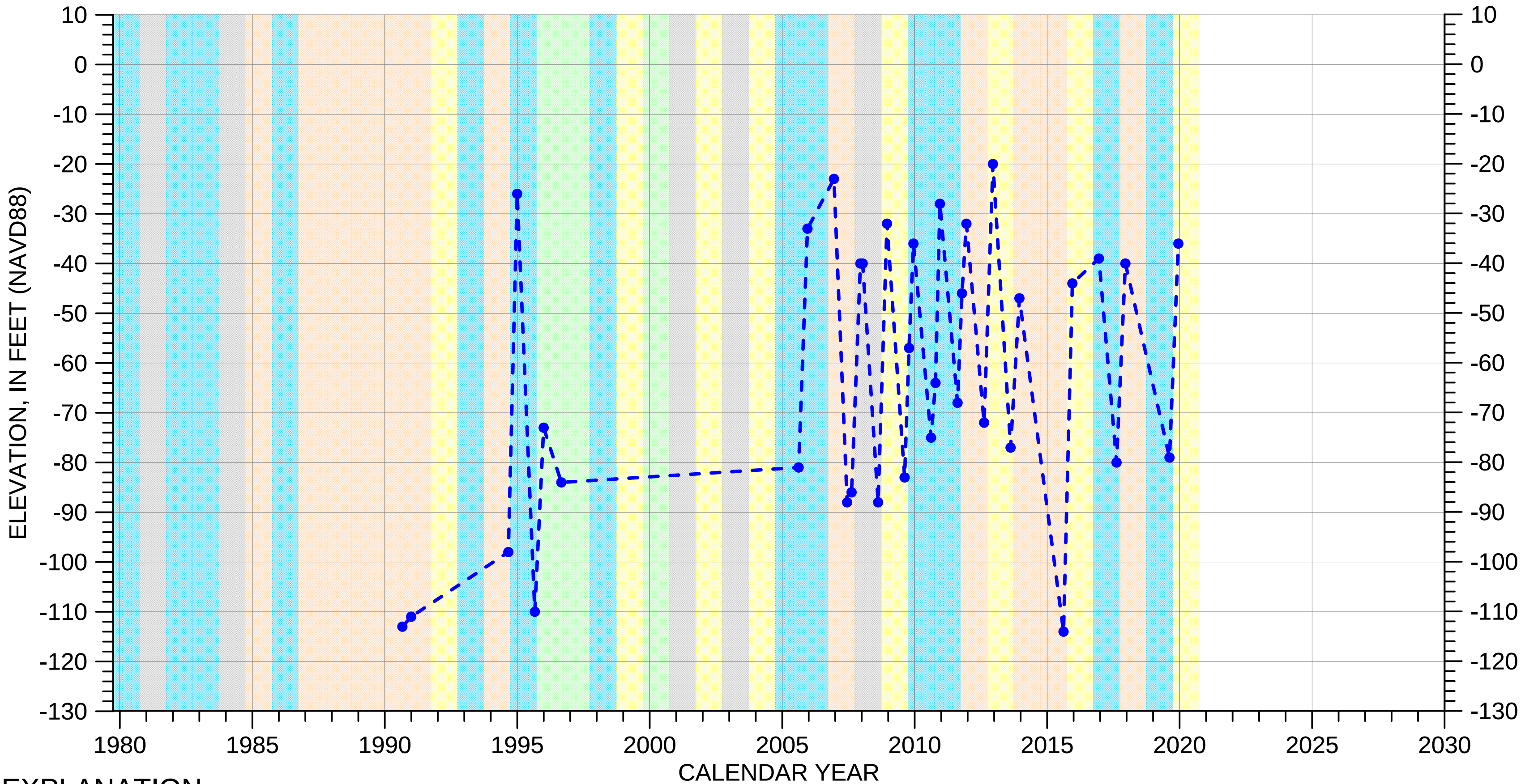
WET - NORMAL

WET

Plot24 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-17F01

Eastside Aquifer Subbasin

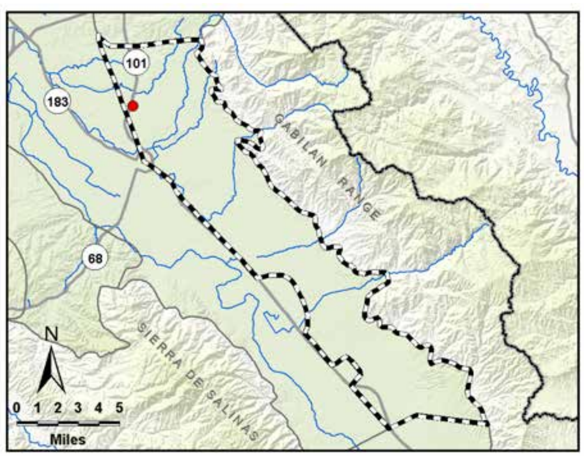


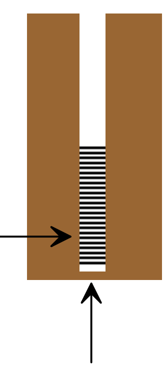
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (92 FT MSL)

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

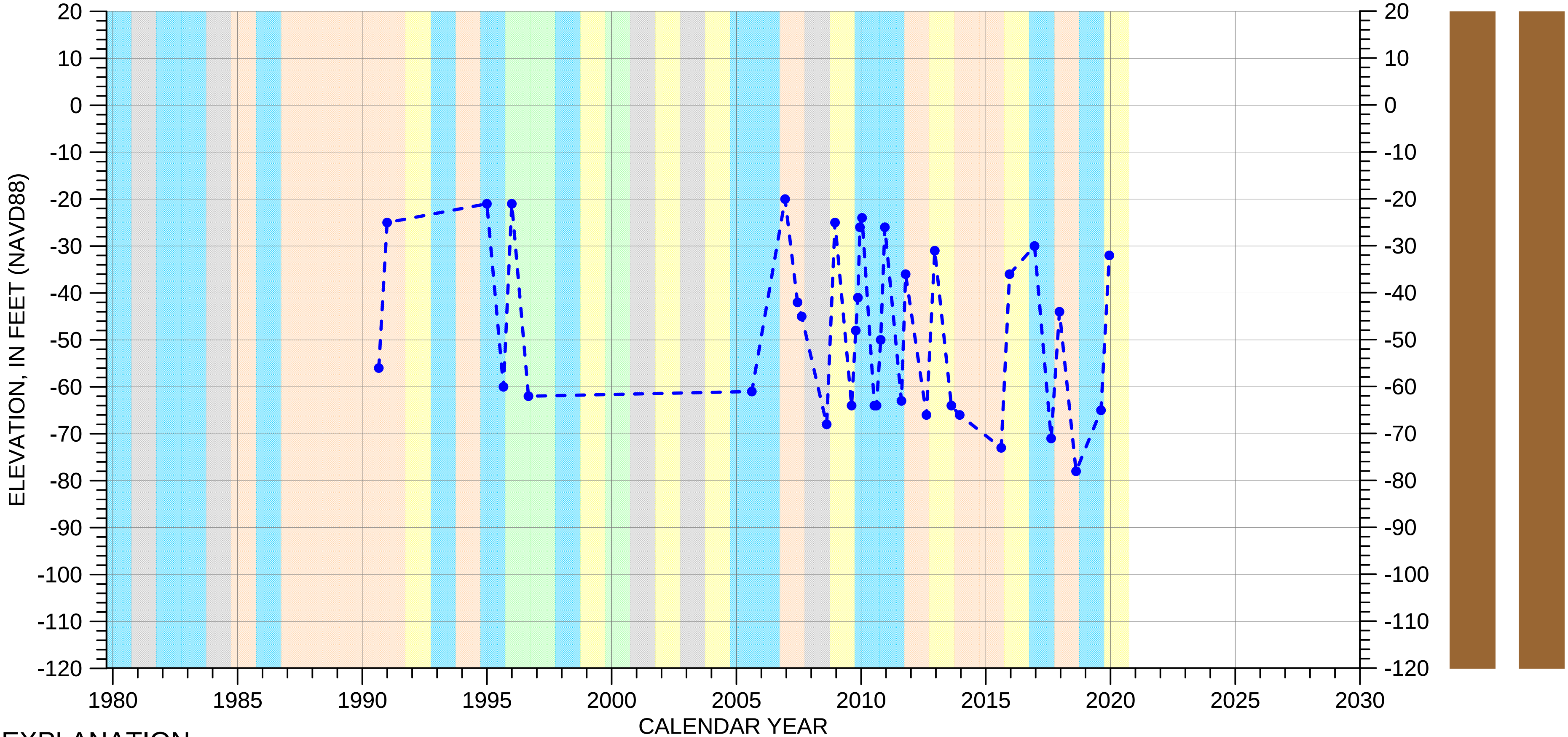




Plot25 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-21L01

Eastside Aquifer Subbasin



EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (80 FT MSL)

WATER YEAR TYPE DESIGNATION

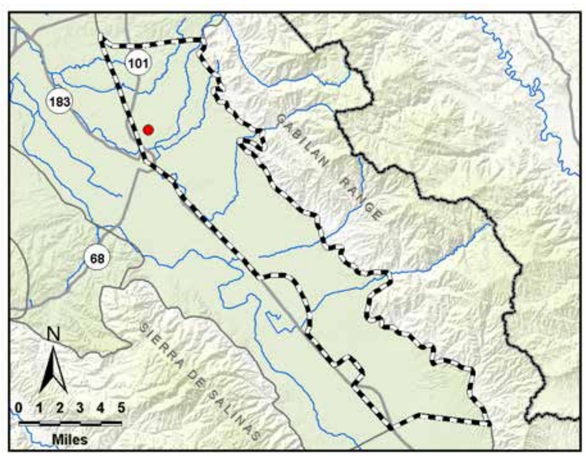
DRY

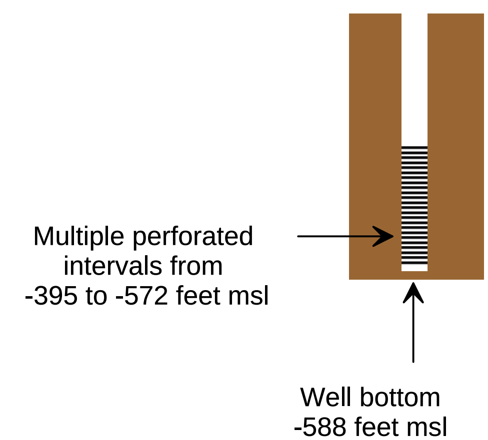
DRY - NORMAL

NORMAL

WET - NORMAL

WET

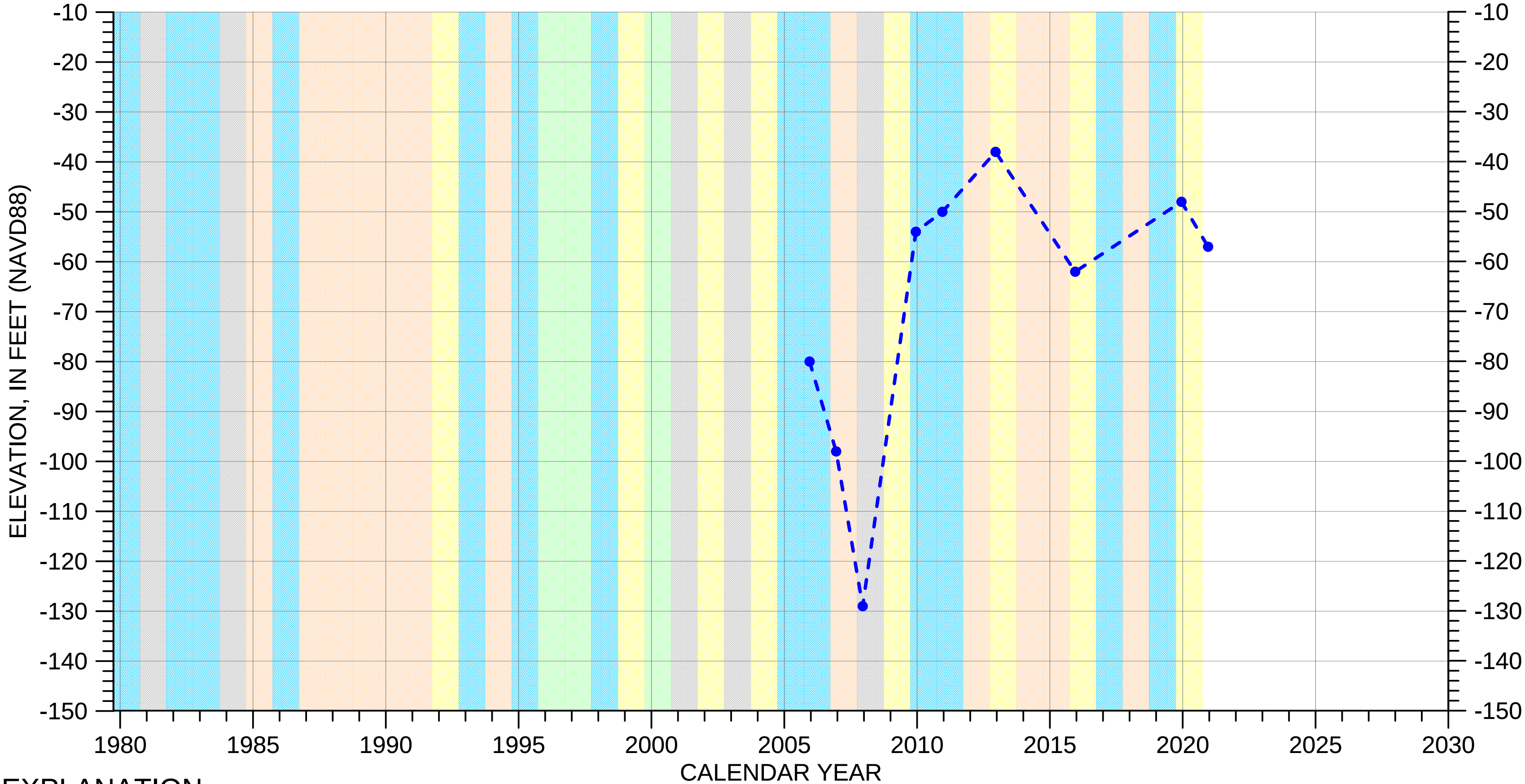




Plot26 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-22D01

Eastside Aquifer Subbasin

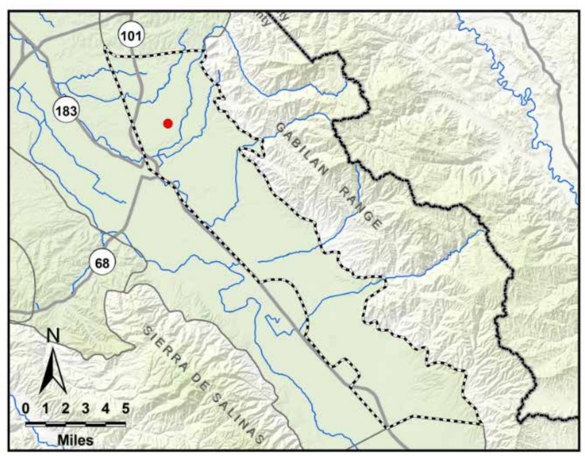


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (102 FT MSL)

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



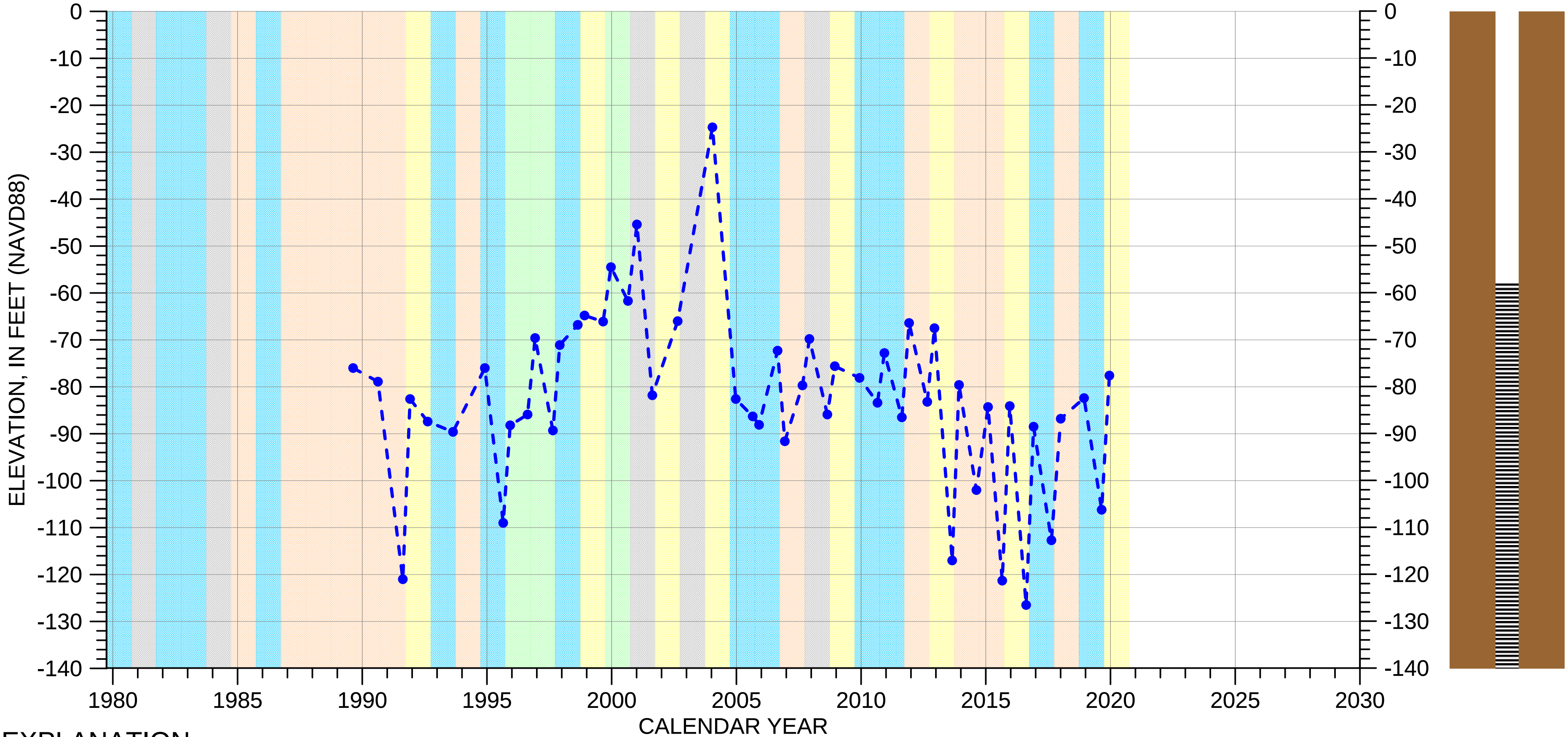
Perforated from -278 to -428 feel msl

Well bottom -448 feet msl

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Old ISP\Chapter_5\Hydrographs\GRFs_Ch8\14S_03E-22D01.grf

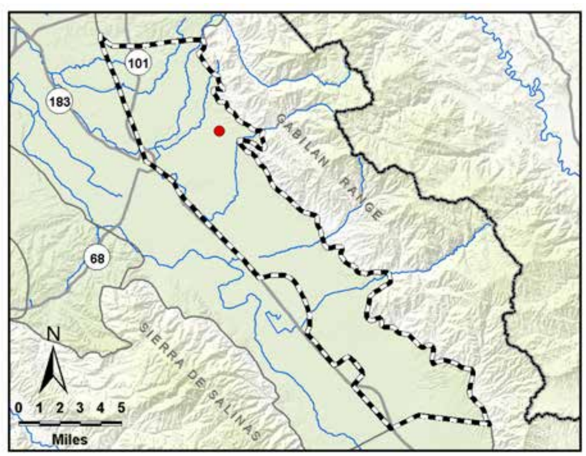
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-24H01

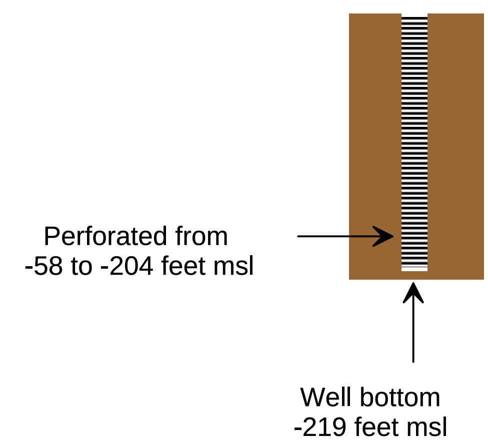
Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (156 FT MSL)





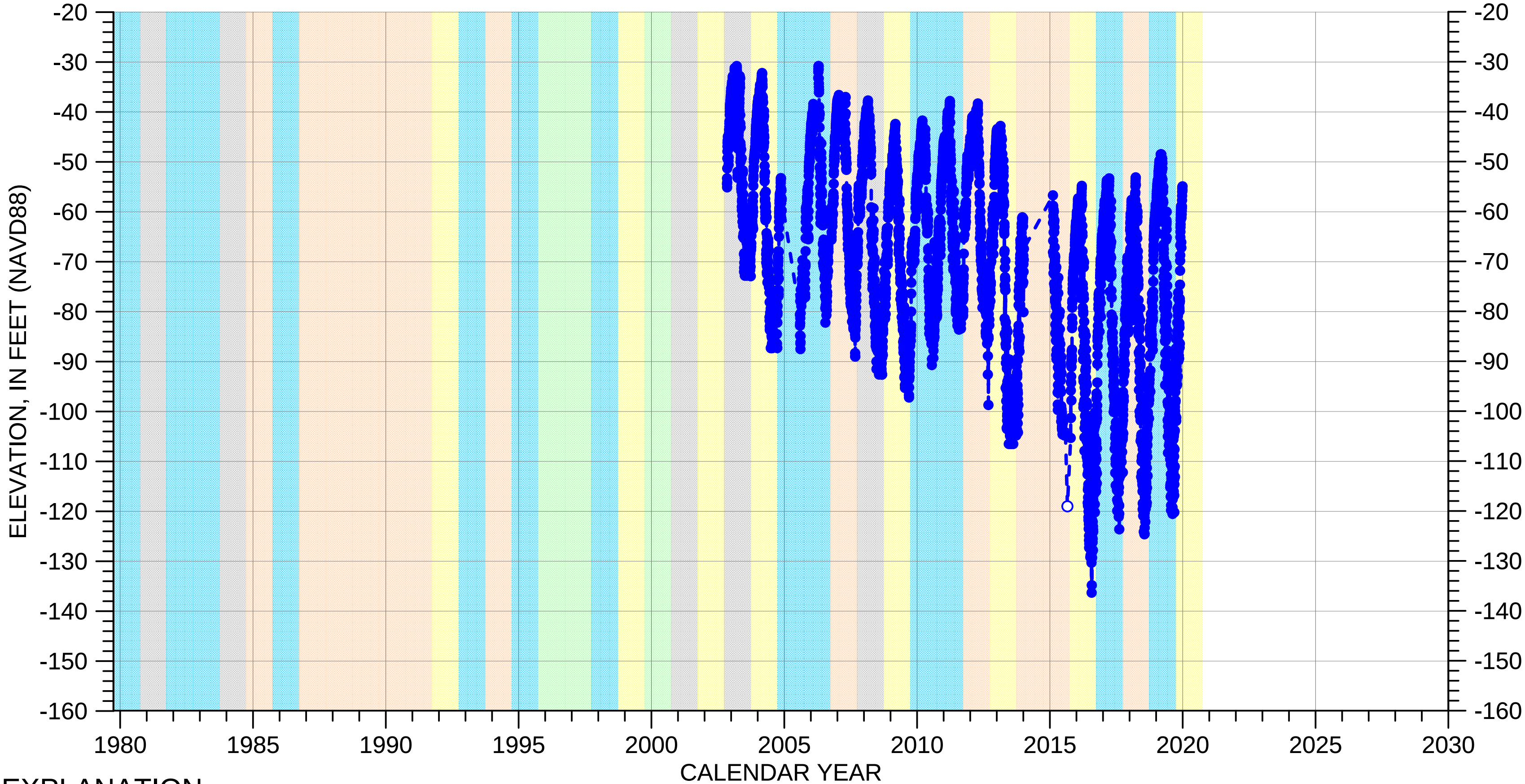
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Plot27 *

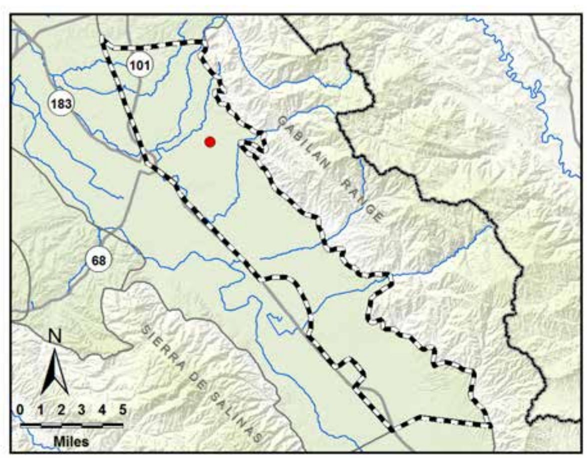
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-25C01

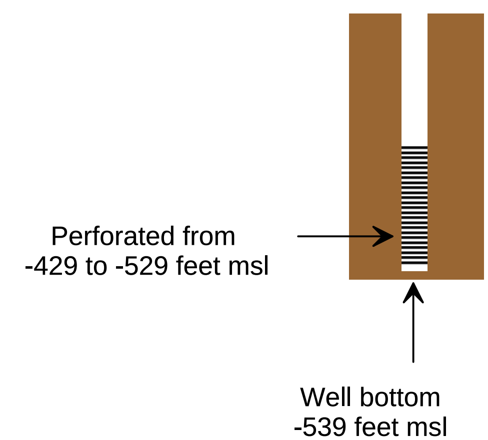
Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (141 FT MSL)





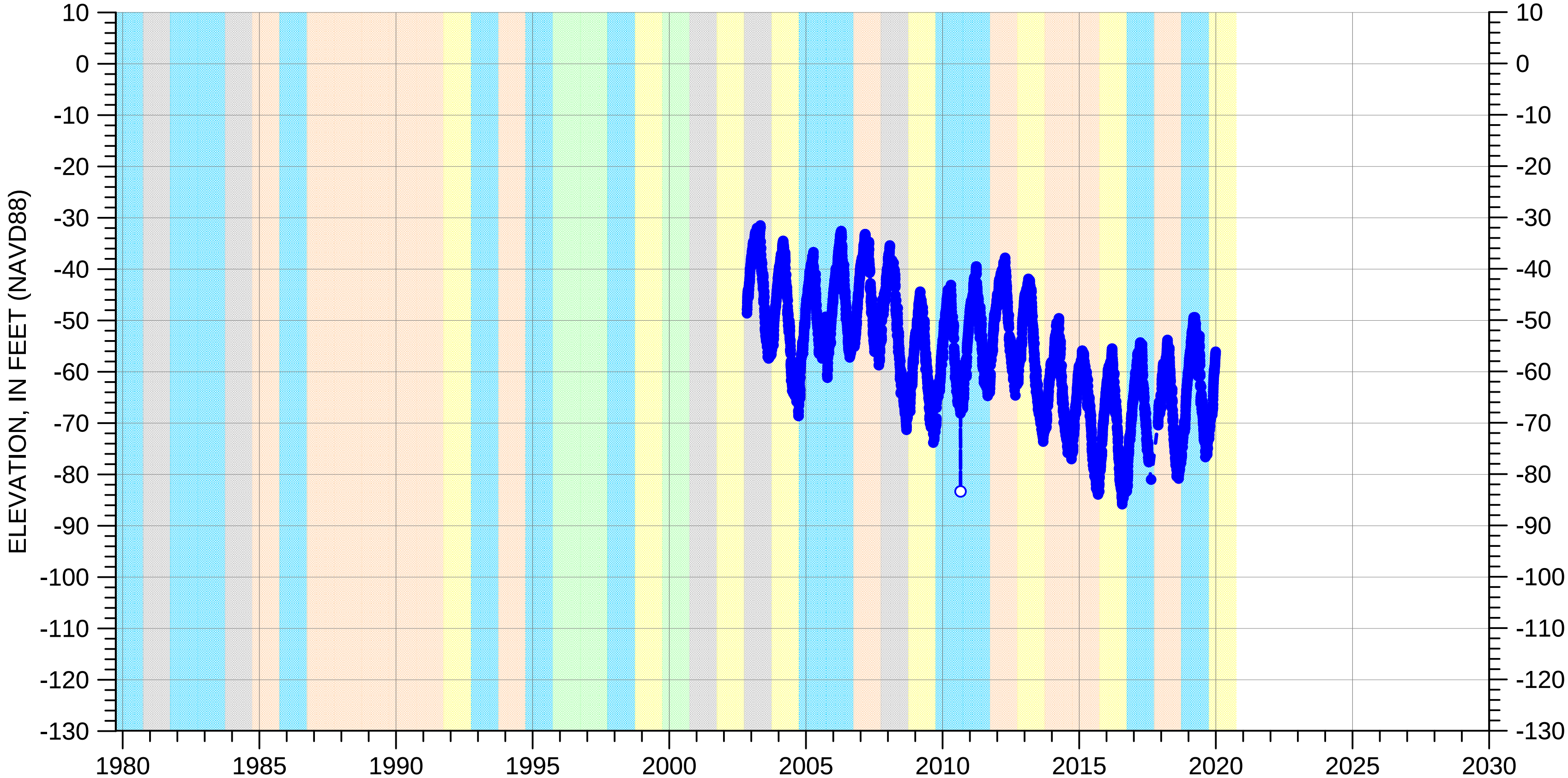
WATER YEAR TYPE DESIGNATION

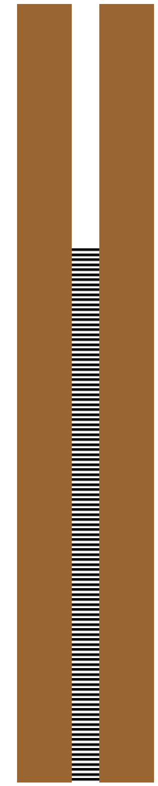
DRY	WET - NORMAL
DRY - NORMAL	WET
NORMAL	

Plot28 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-25C02

Eastside Aquifer Subbasin





EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (141 FT MSL)

WATER YEAR TYPE DESIGNATION

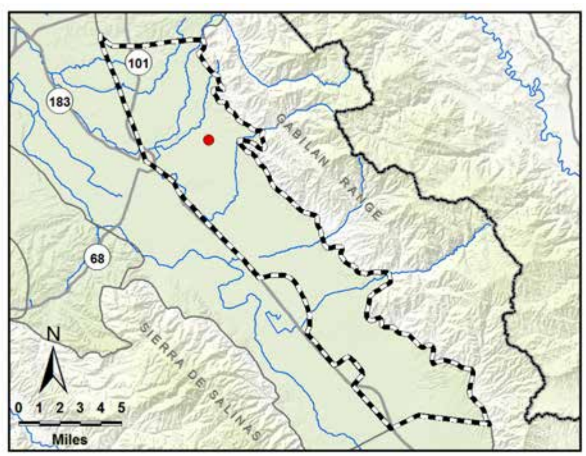
DRY

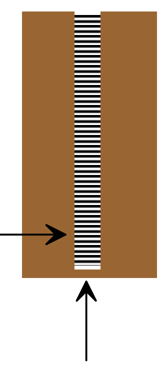
DRY - NORMAL

NORMAL

WET - NORMAL

WET





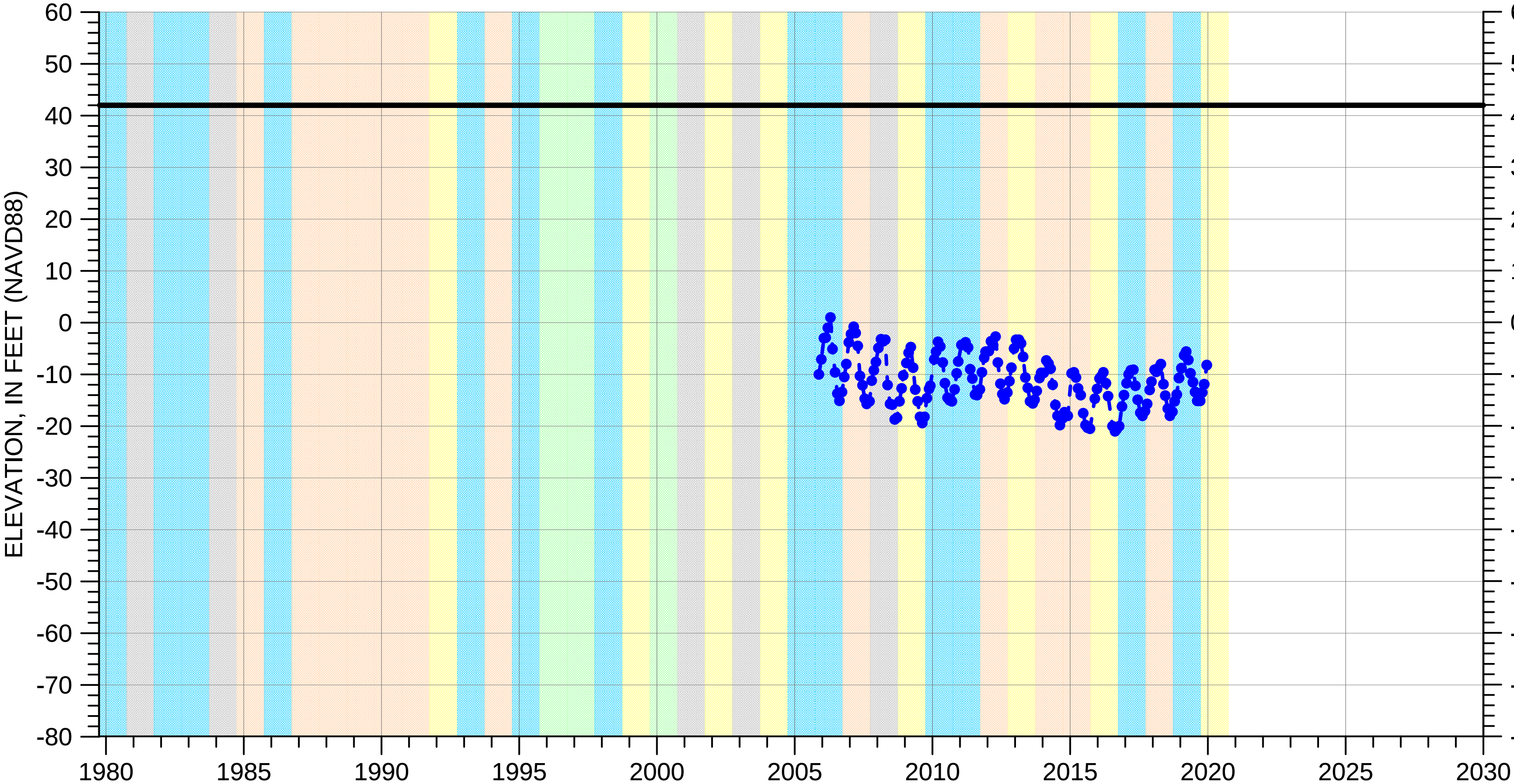
Perforated from
-34 to -219 feet msl

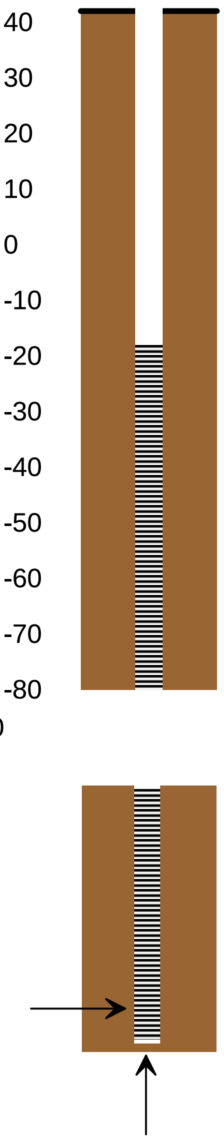
Well bottom
-229 feet msl

Plot29 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-27B01

Eastside Aquifer Subbasin



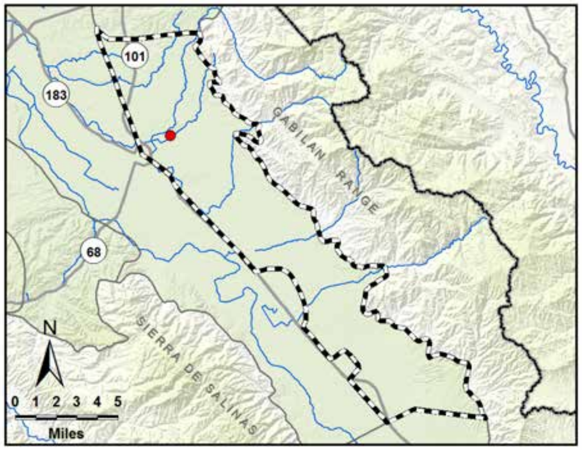


EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface



WATER YEAR TYPE DESIGNATION

DRY

DRY - NORMAL

NORMAL

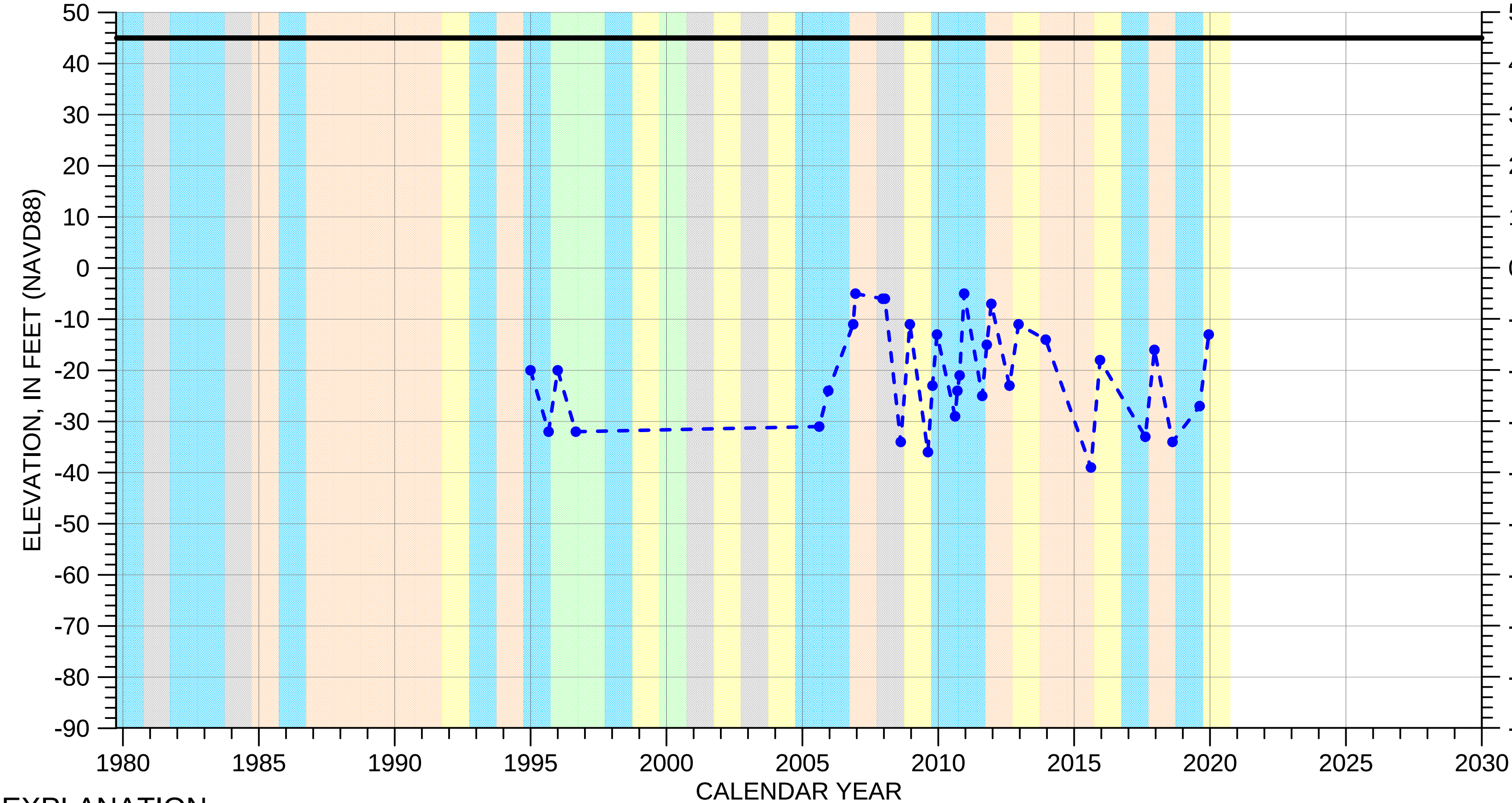
WET - NORMAL

WET

Plot30 *

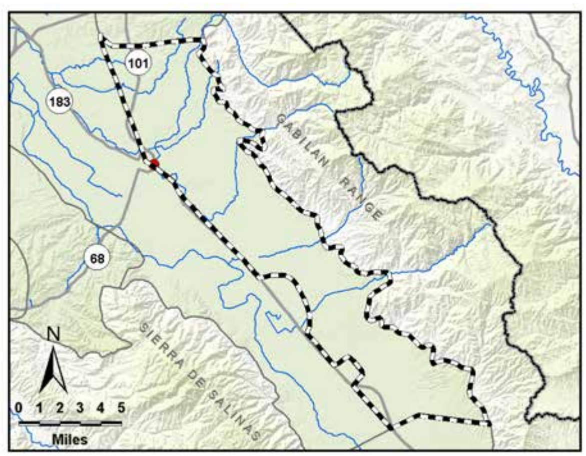
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-33G01

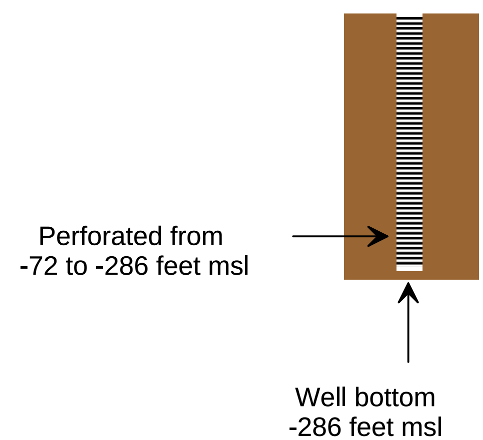
Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface





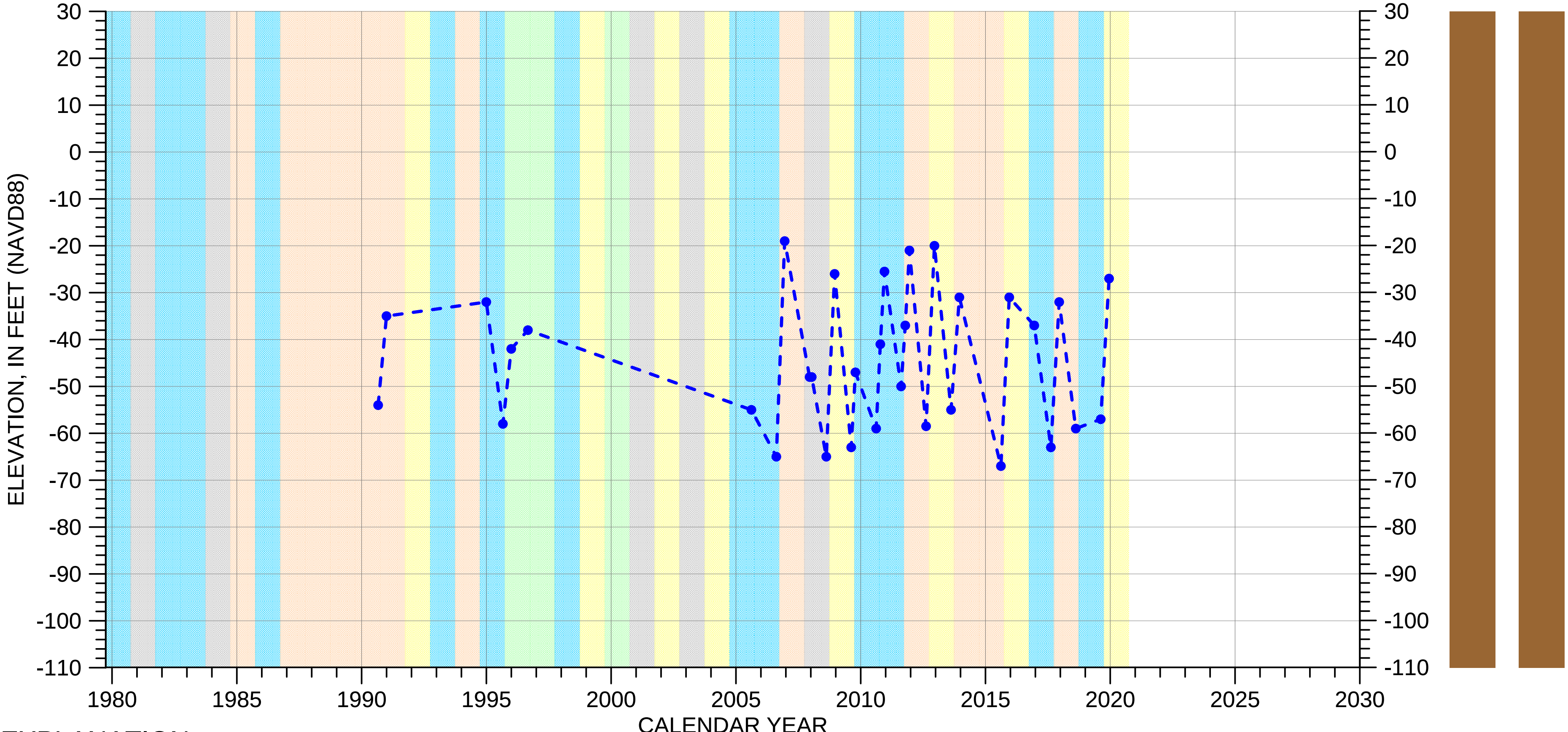
Plot31 *

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-34C01

Eastside Aquifer Subbasin

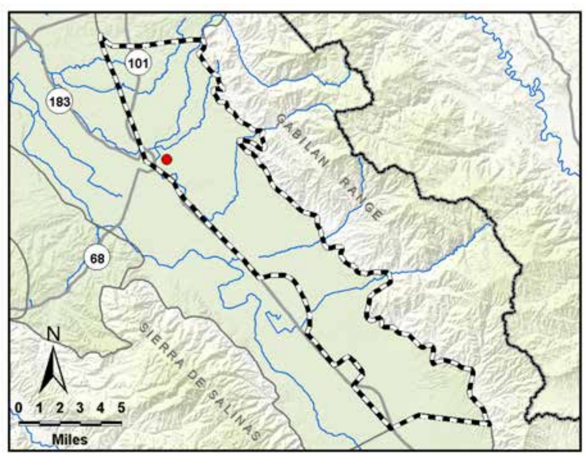


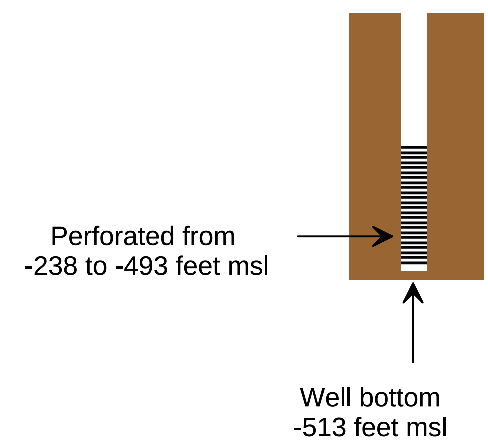
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (67 FT MSL)

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

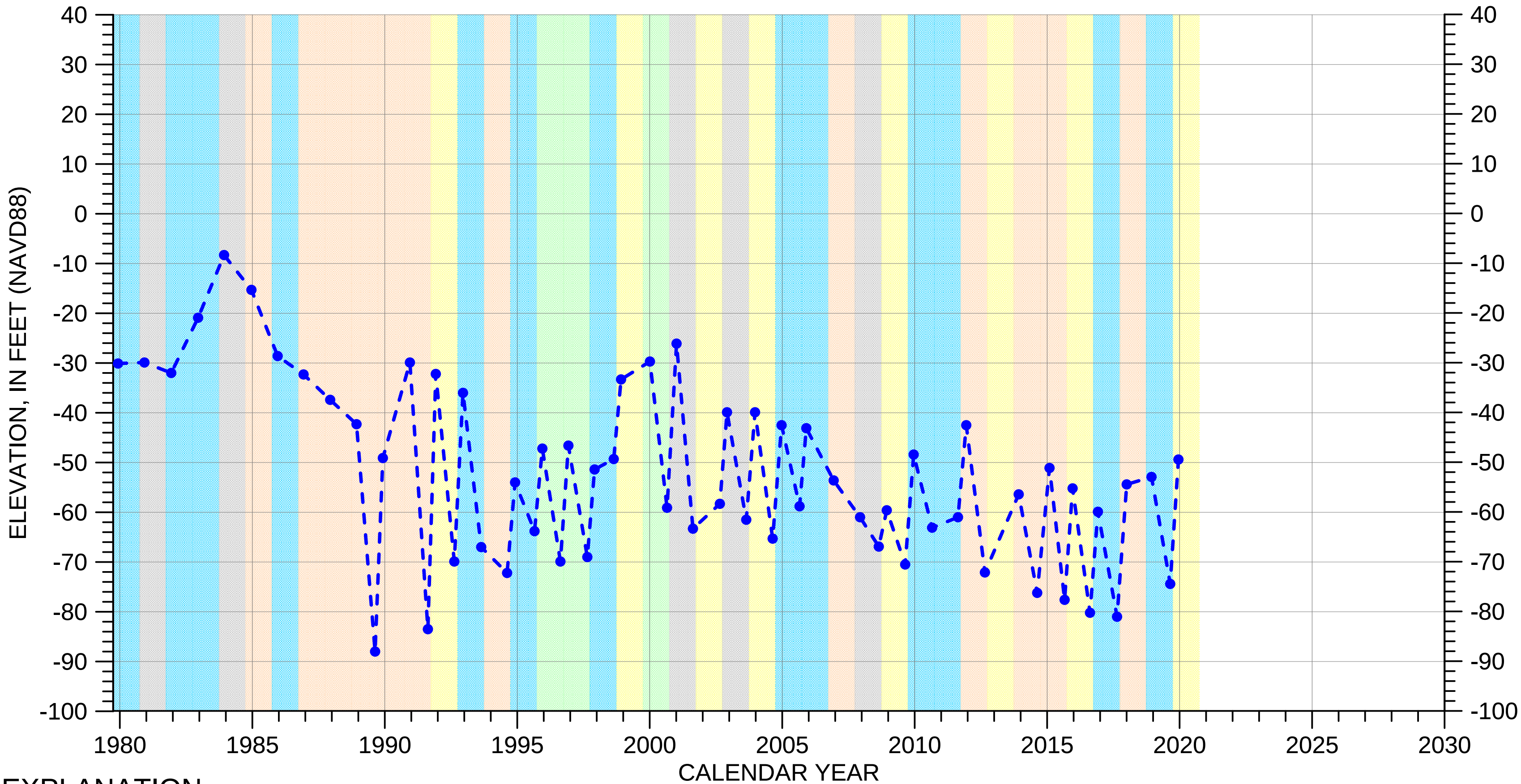




Plot32 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-36A01

Eastside Aquifer Subbasin



EXPLANATION

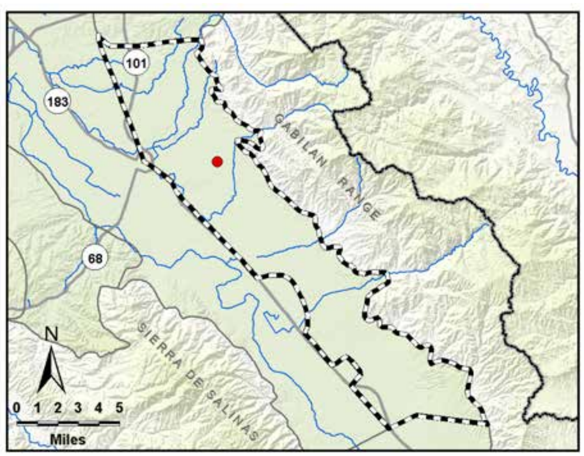
Groundwater Elevation

Suspect Measurement

Land Surface (140 FT MSL)

WATER YEAR TYPE DESIGNATION

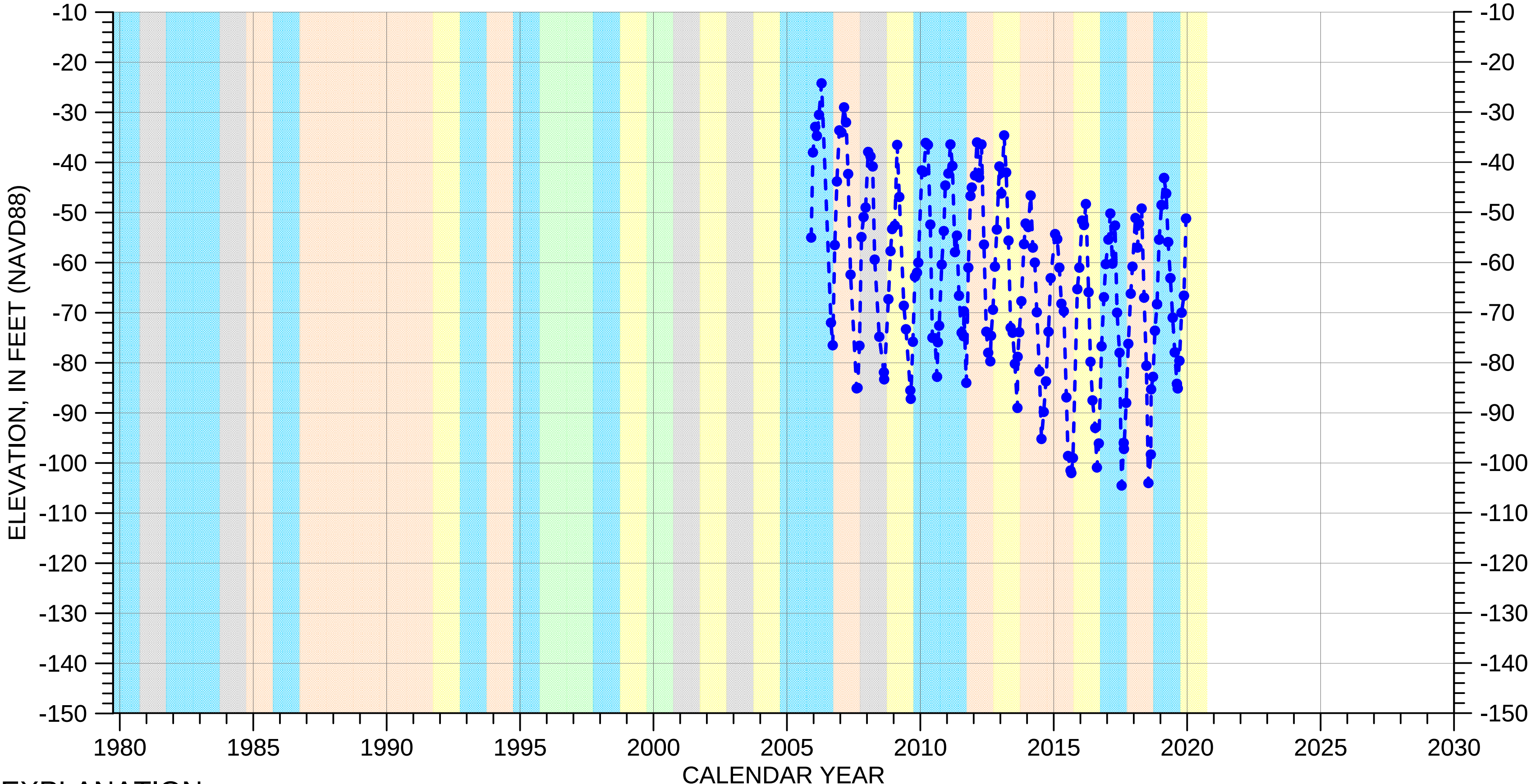
DRY
DRY - NORMAL
NORMAL
WET - NORMAL
WET



Plot33 *

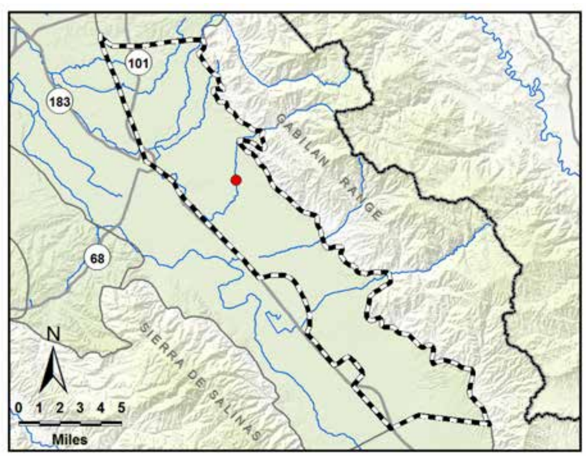
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/04E-31Q02

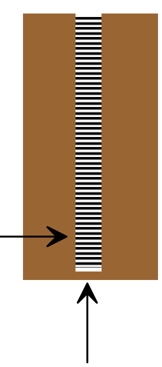
Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (104 FT MSL)





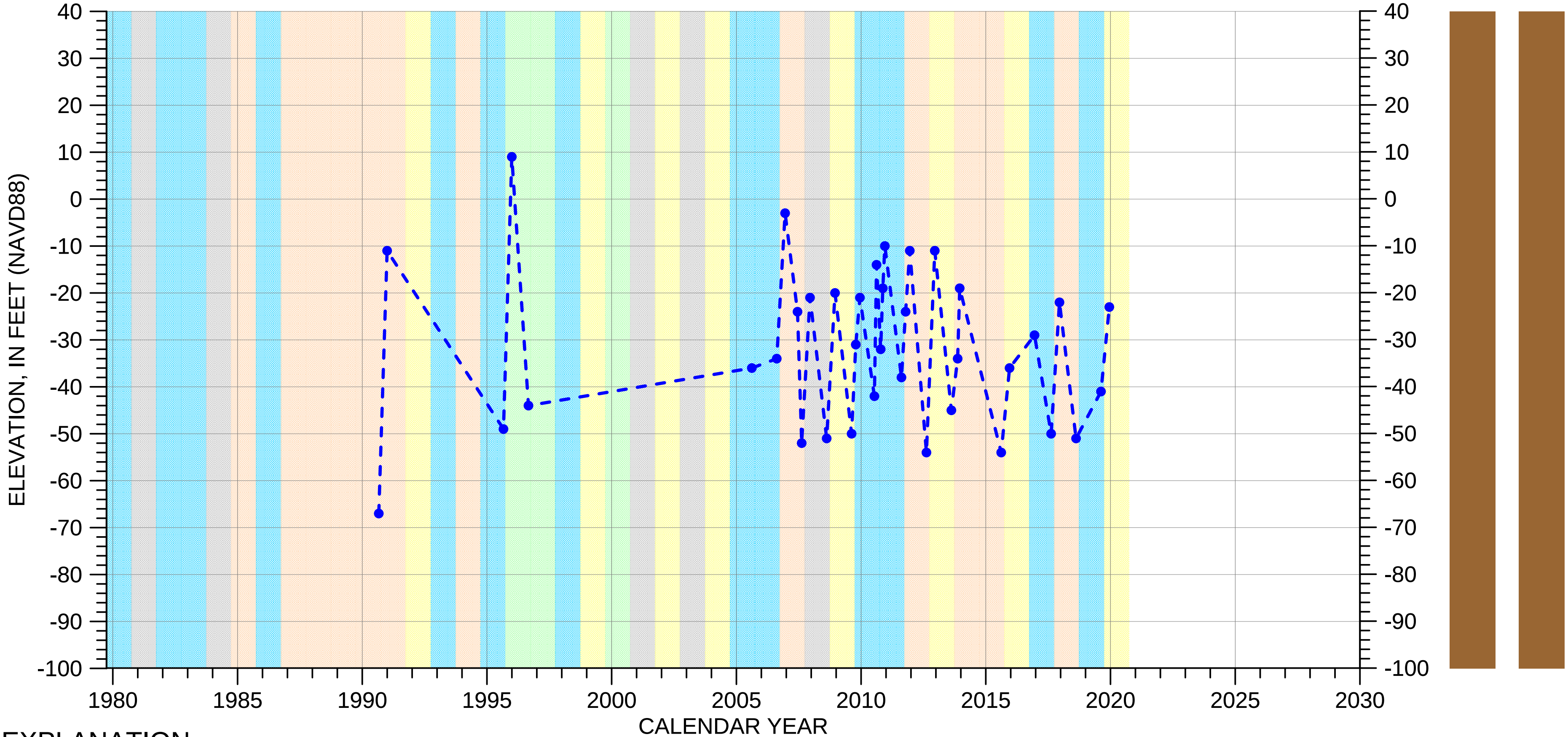
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Plot34 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/03E-02G01

Eastside Aquifer Subbasin

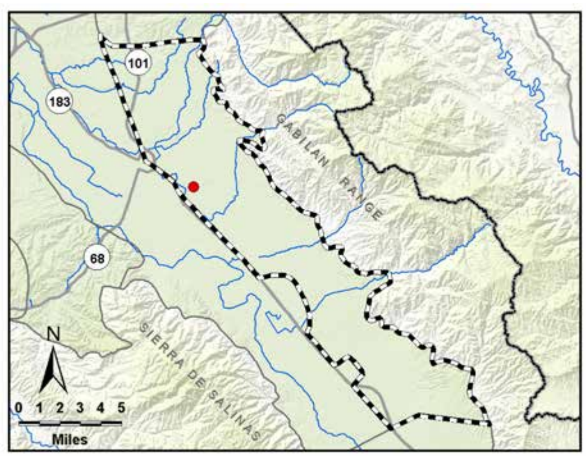


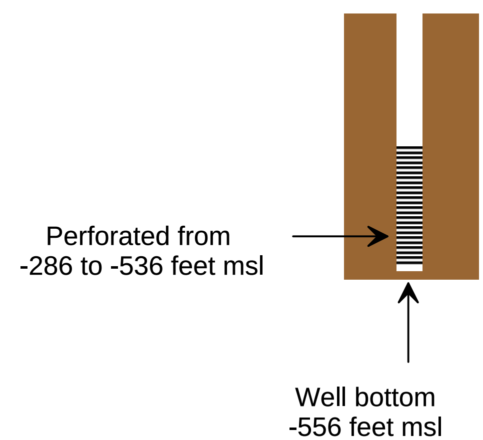
EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (74 FT MSL)





WATER YEAR TYPE DESIGNATION

DRY

DRY - NORMAL

NORMAL

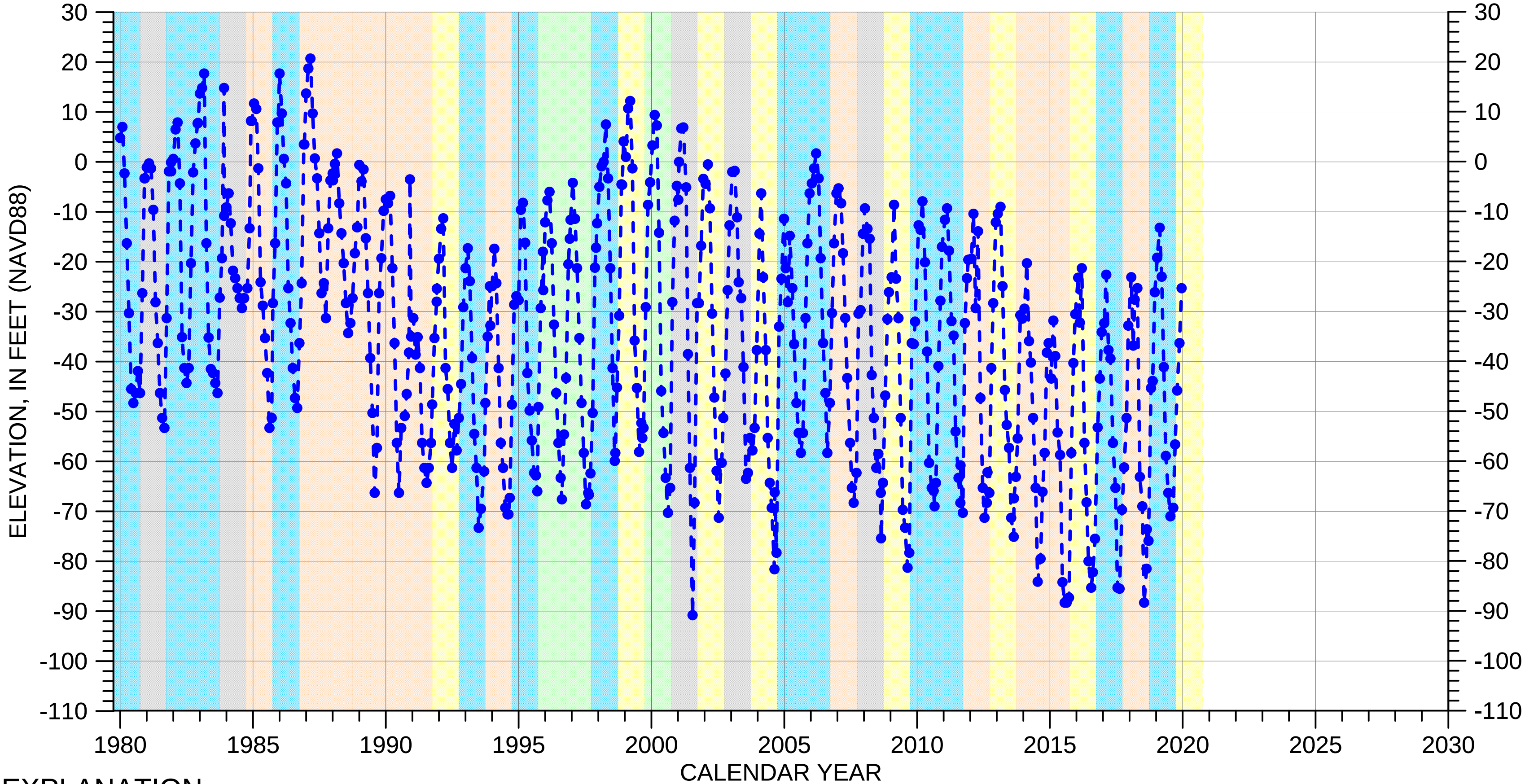
WET - NORMAL

WET

Plot35 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-06R01

Eastside Aquifer Subbasin

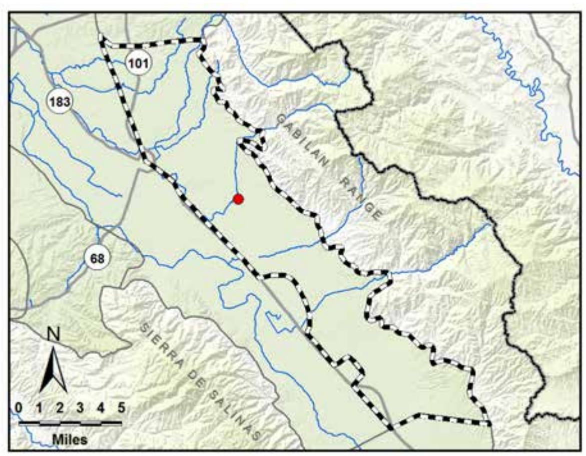


EXPLANATION

Groundwater Elevation

Suspect Measurement

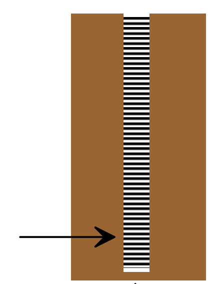
Land Surface (94 FT MSL)



WATER YEAR TYPE DESIGNATION

DRY
DRY - NORMAL
NORMAL
WET - NORMAL
WET

Multiple perforated intervals from -96 to -682 feet msl

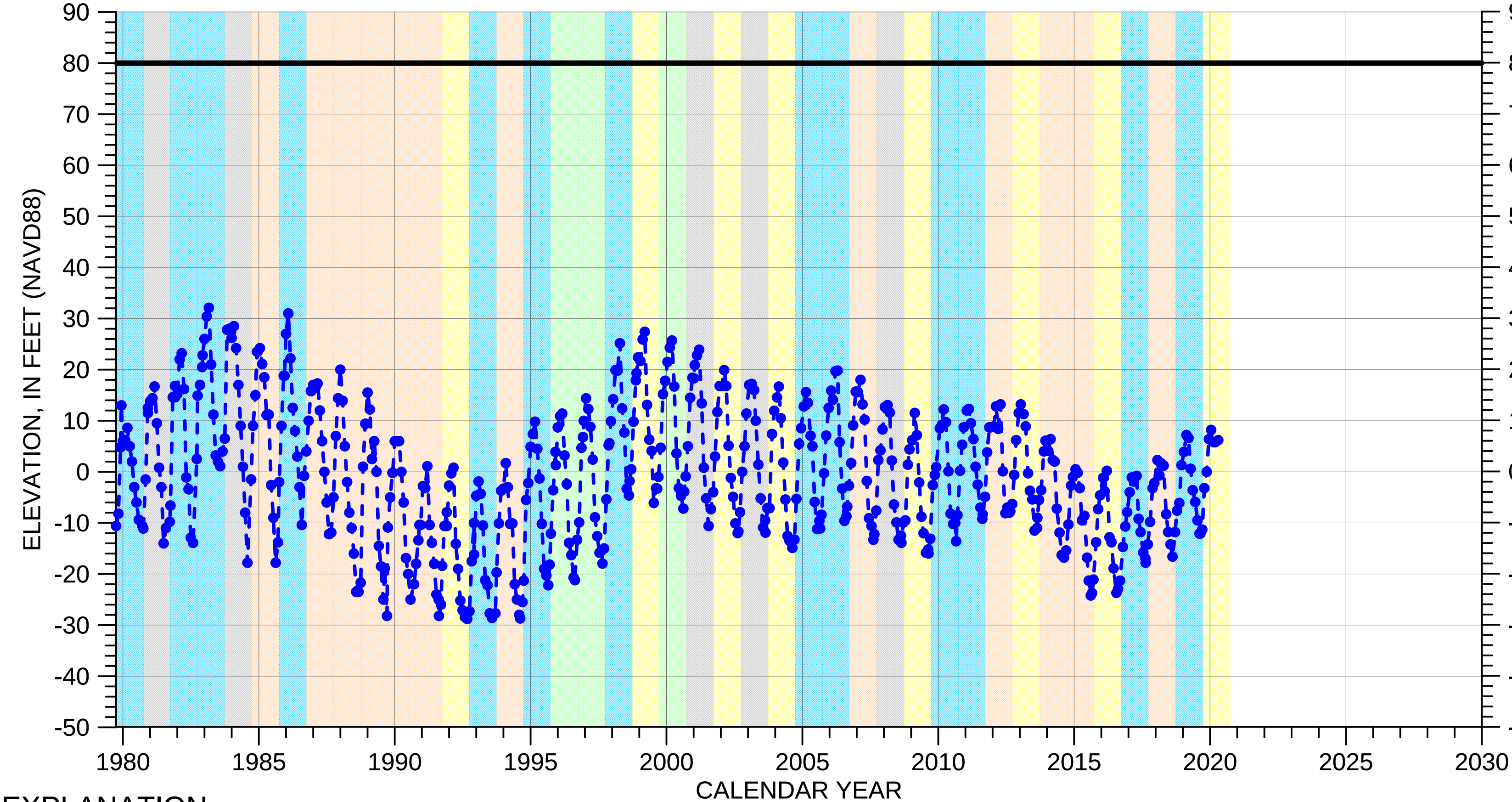


Well bottom -692 feet msl

Plot36 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-07R02

Eastside Aquifer Subbasin

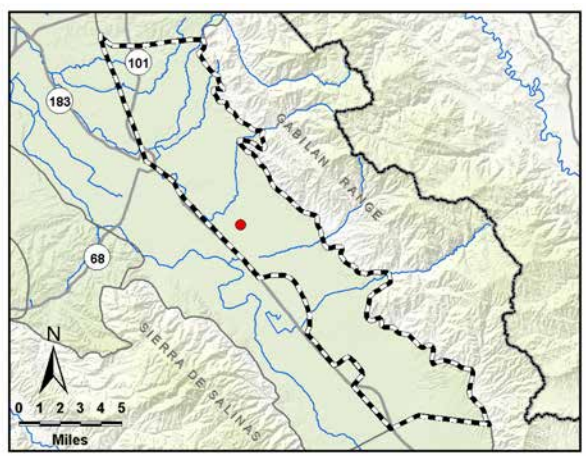


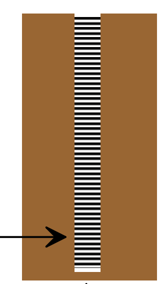
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





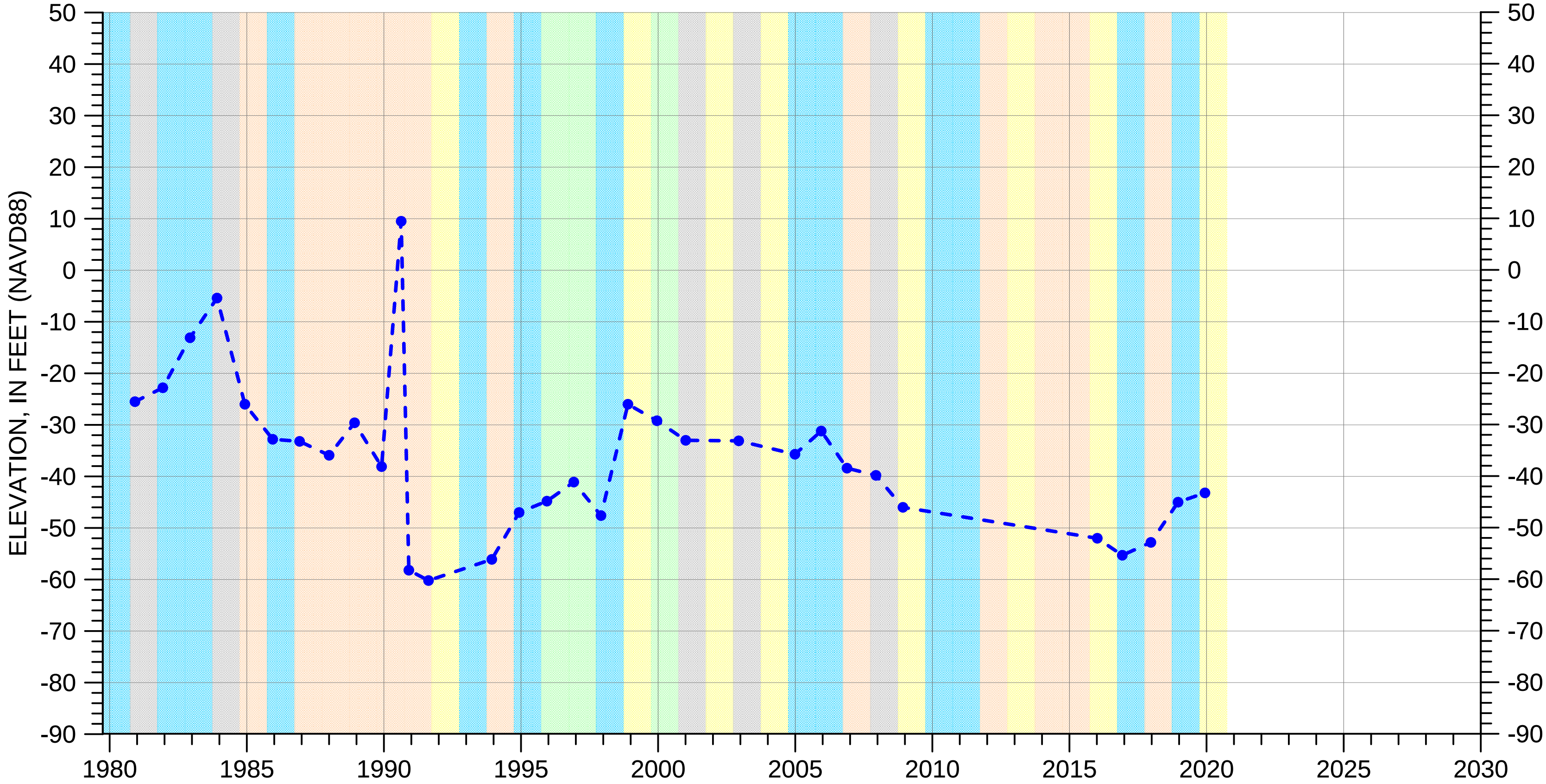
Multiple perforated intervals from -29 to -210 feet msl

Well bottom -224 feet msl

Plot37 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-09D01

Eastside Aquifer Subbasin



EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (127 FT MSL)

WATER YEAR TYPE DESIGNATION

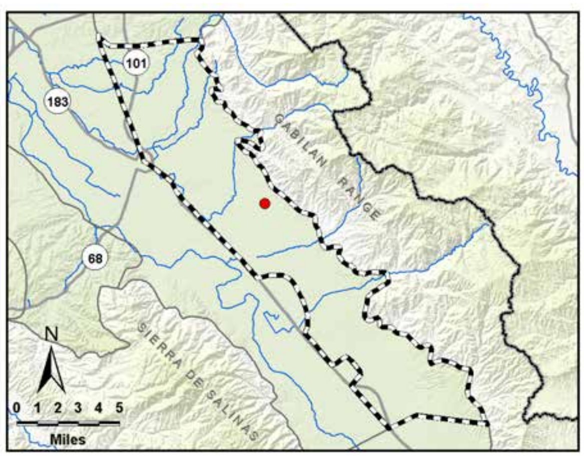
DRY

DRY - NORMAL

NORMAL

WET - NORMAL

WET



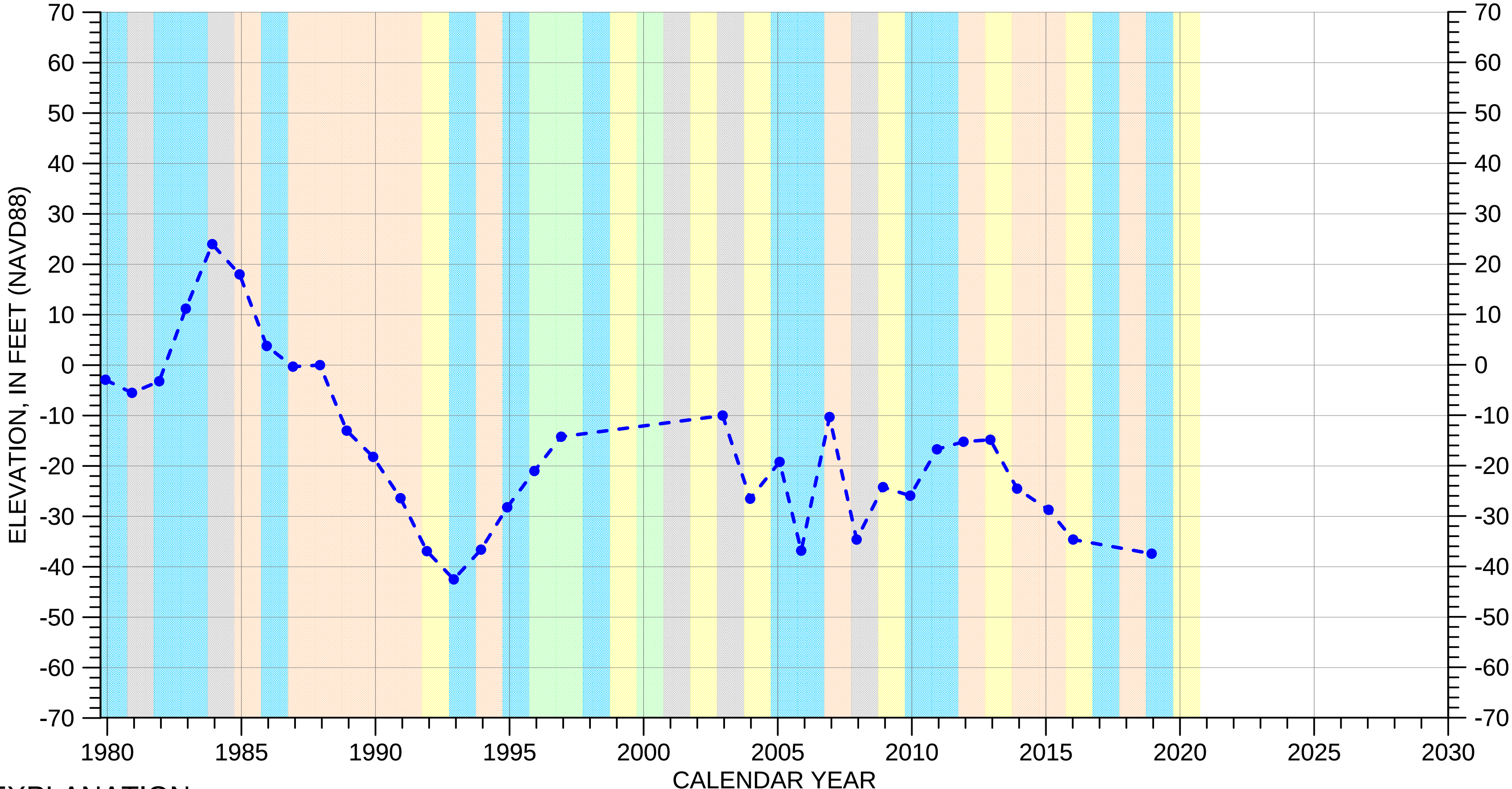
Perforated interval unknown

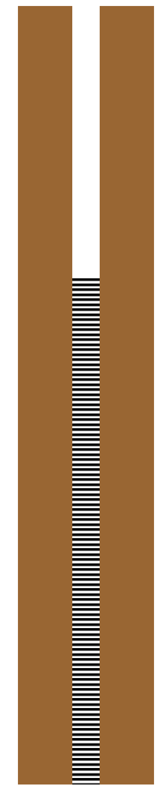
Well bottom
-334 feet msl

Plot38 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-14N01

Eastside Aquifer Subbasin



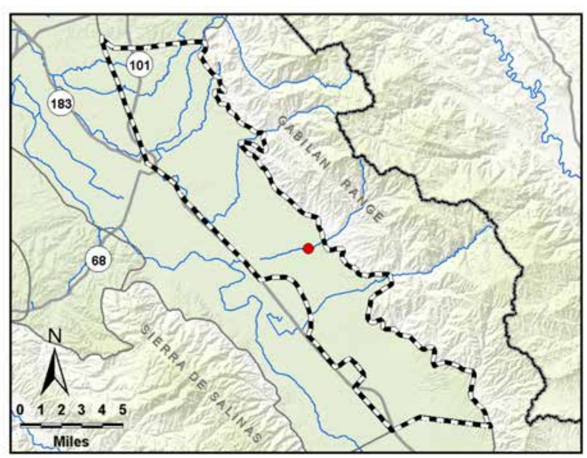


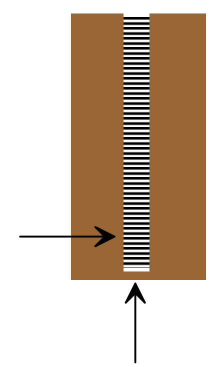
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (240 FT MSL)

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

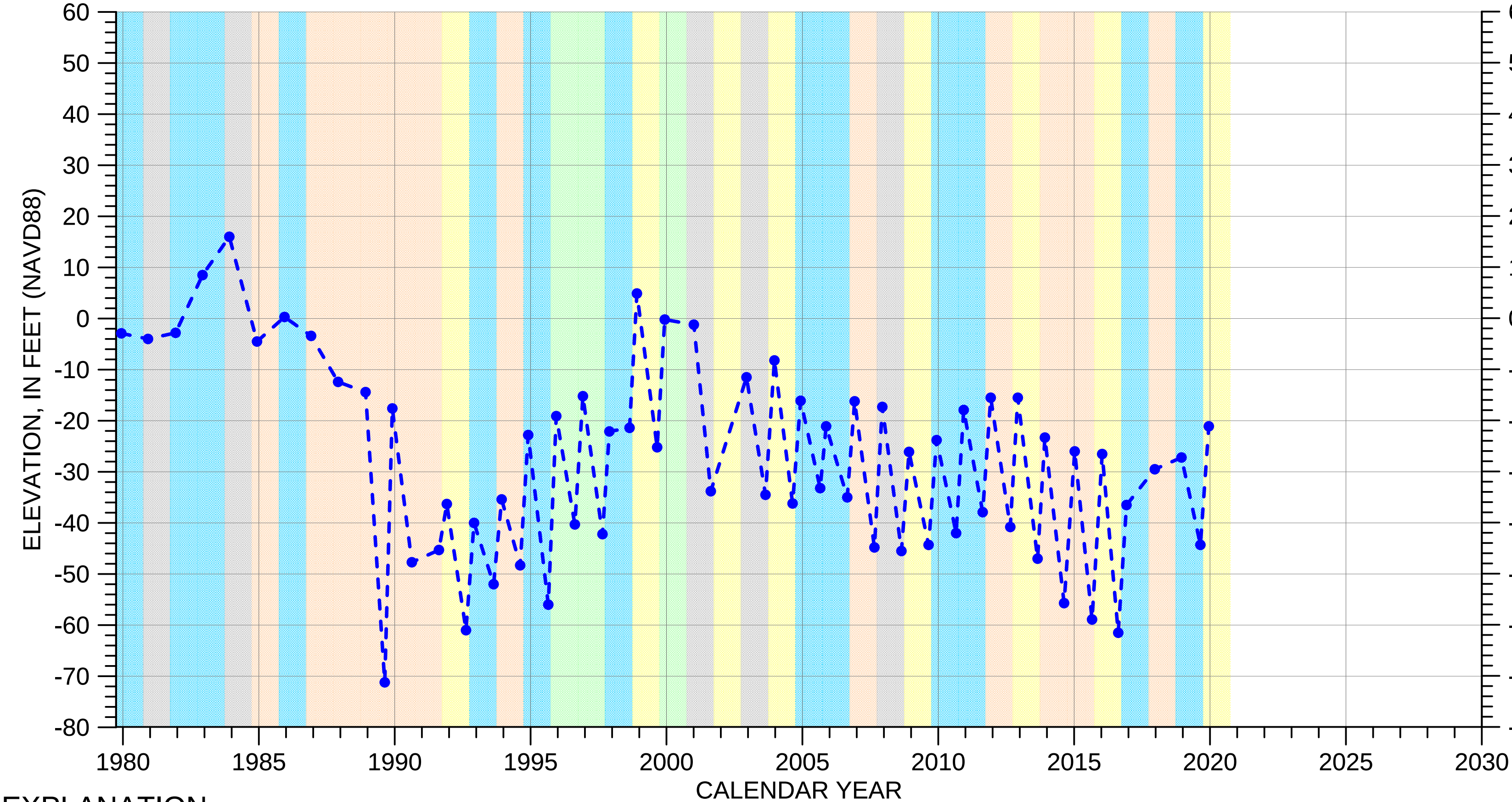




Plot39 *

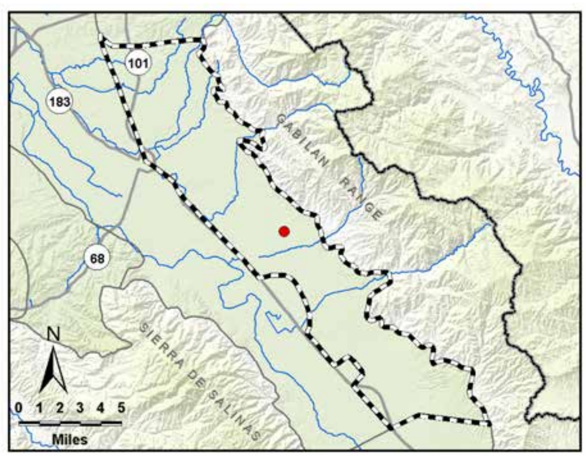
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-15D02

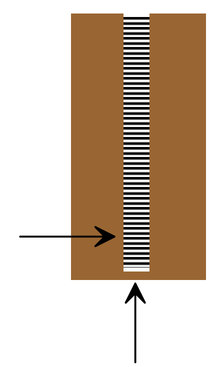
Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (186 FT MSL)





Perforated from
-14 to -314 feet msl

Well bottom
-324 feet msl

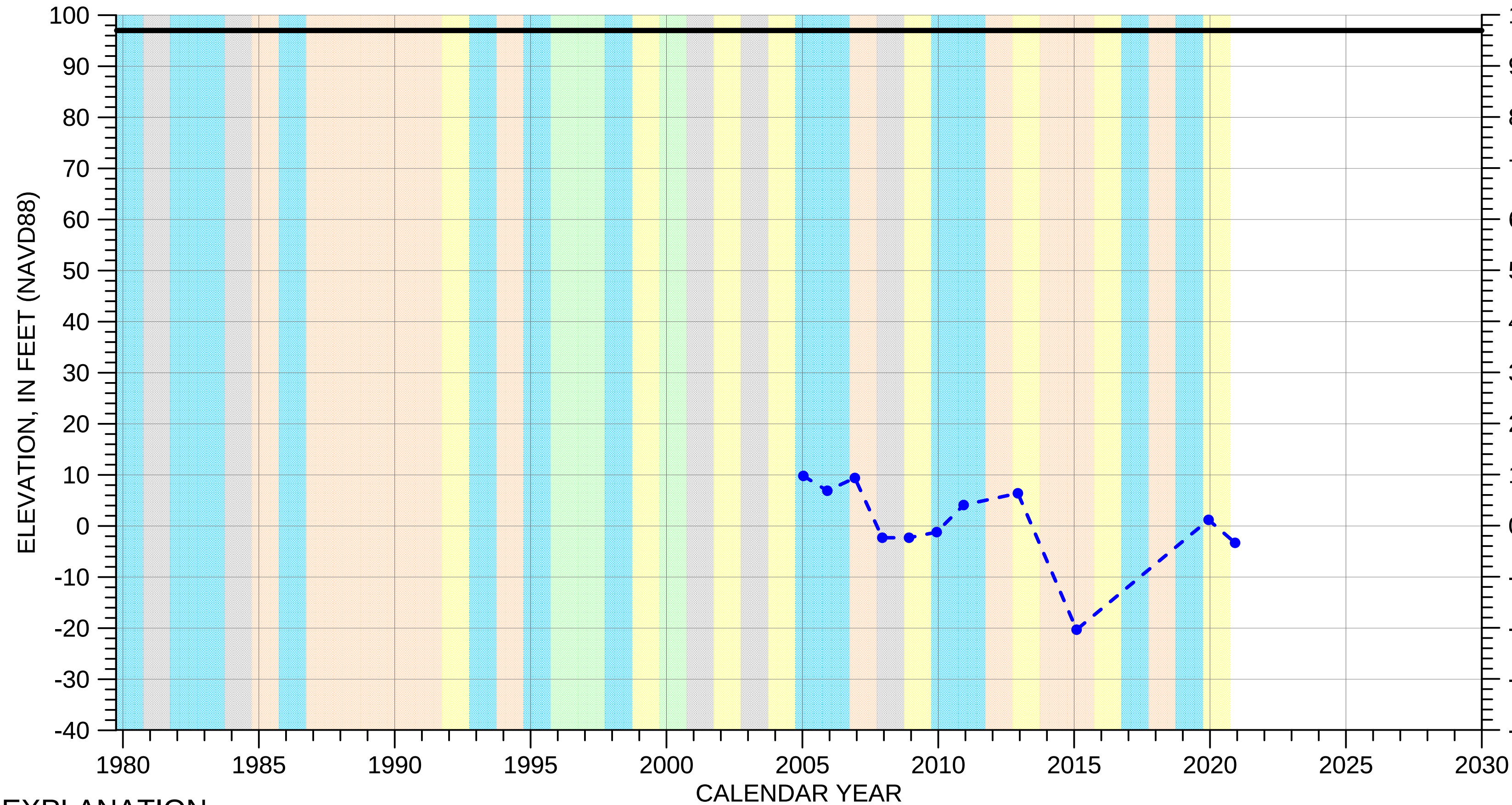
WATER YEAR TYPE DESIGNATION

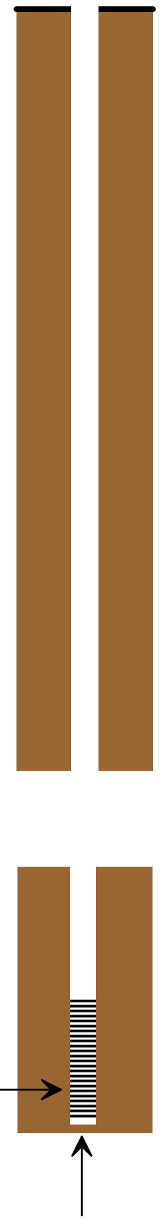
DRY	WET - NORMAL
DRY - NORMAL	WET
NORMAL	

Plot40 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-17P02

Eastside Aquifer Subbasin





EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface

WATER YEAR TYPE DESIGNATION

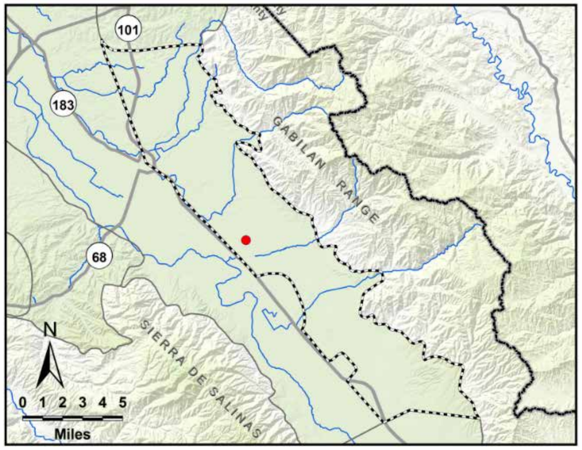
DRY

DRY - NORMAL

NORMAL

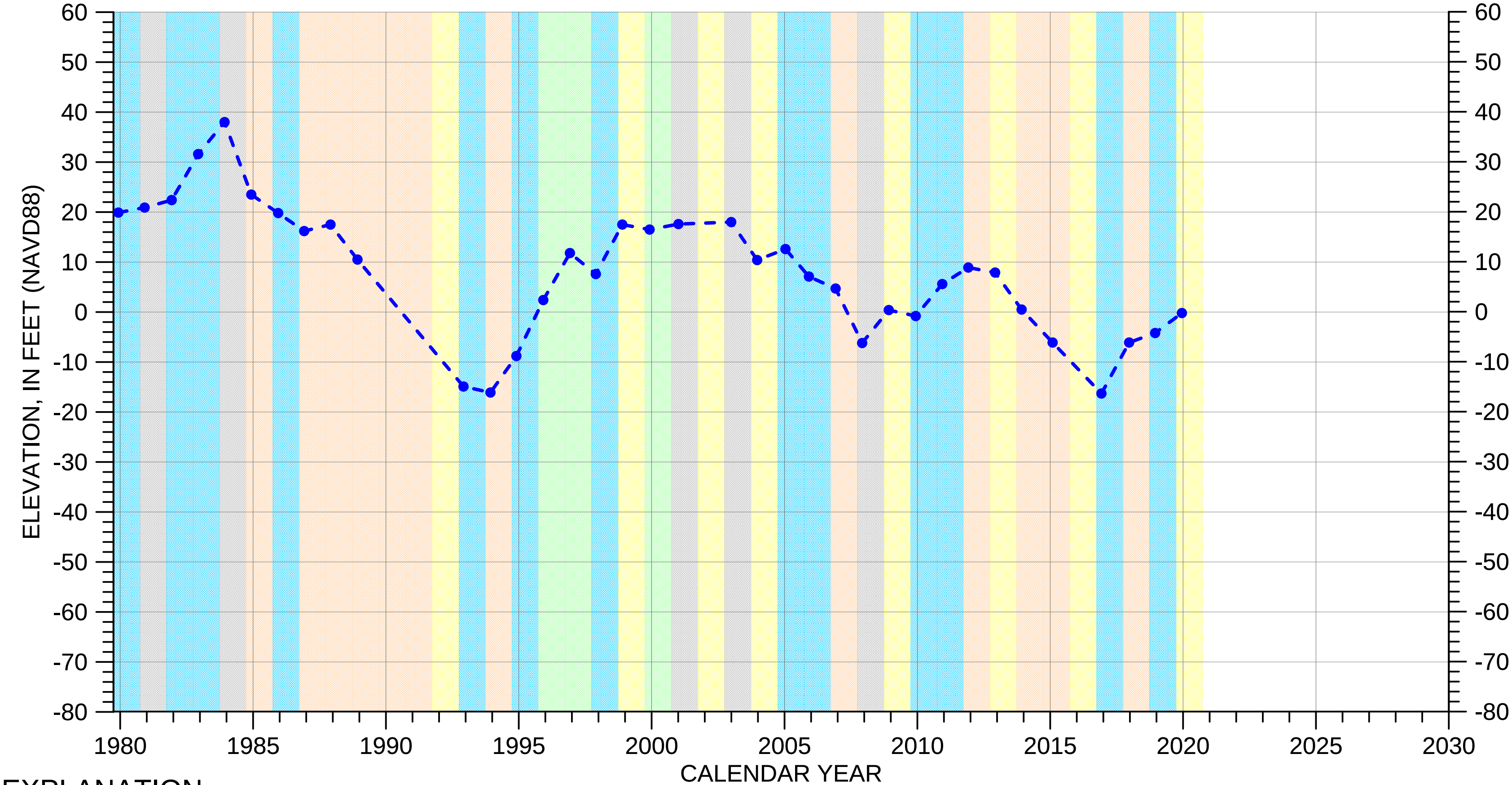
WET - NORMAL

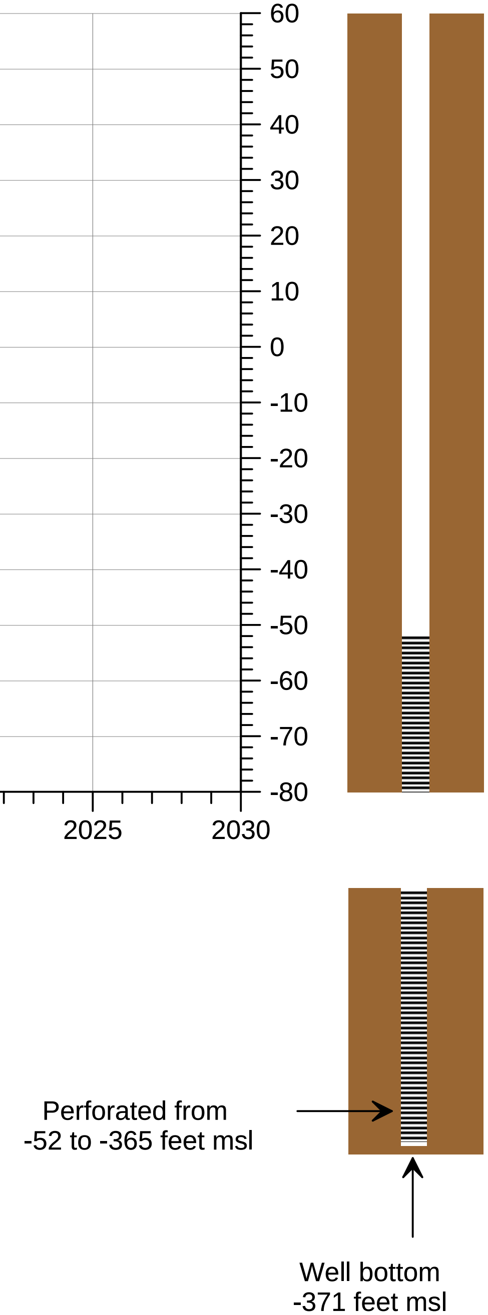
WET



\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Old ISP\Chapter_5\Hydrographs\GRFs_Ch8\15S_04E-17P02.grf

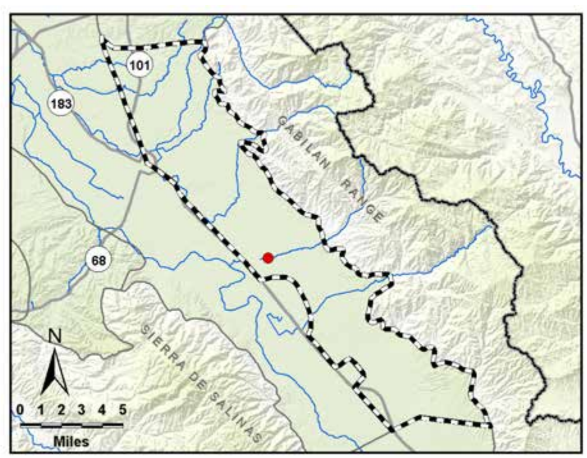
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-21F04 Eastside Aquifer Subbasin





EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (127 FT MSL)



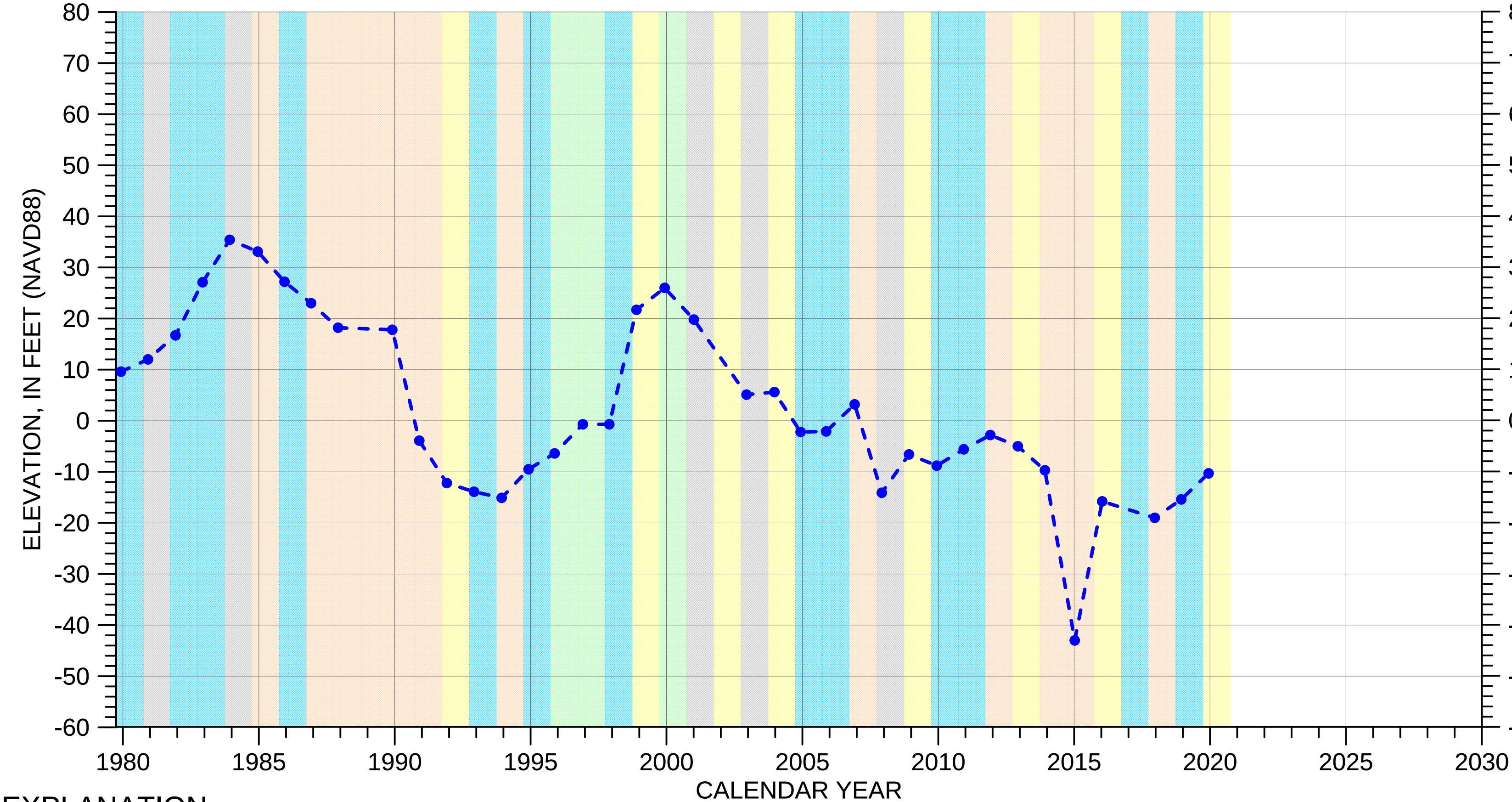
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Plot41 *

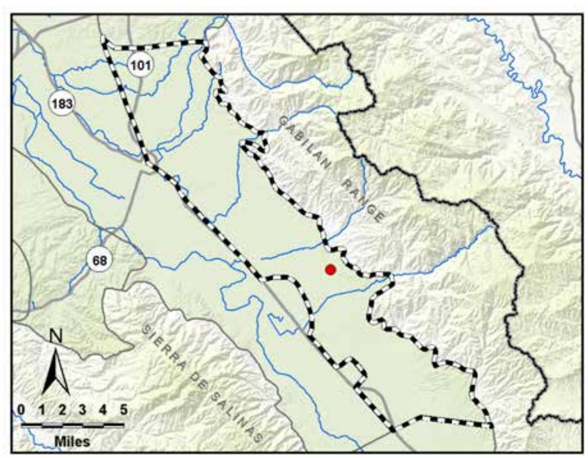
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-24N03

Eastside Aquifer Subbasin

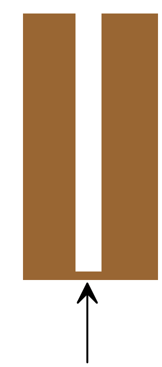


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (272 FT MSL)



Perforated interval unknown



Well bottom
-98 feet msl

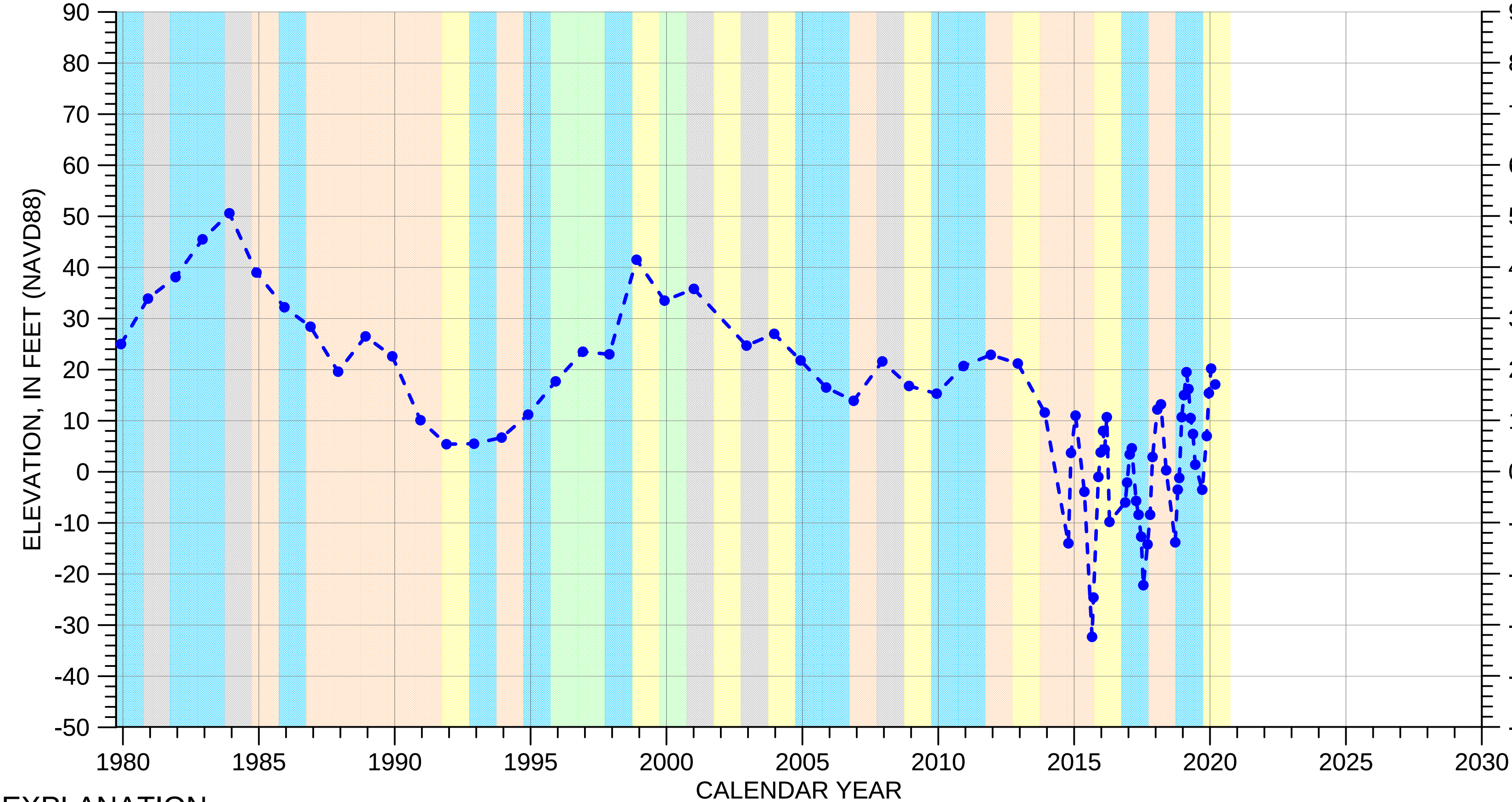
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Plot42 *

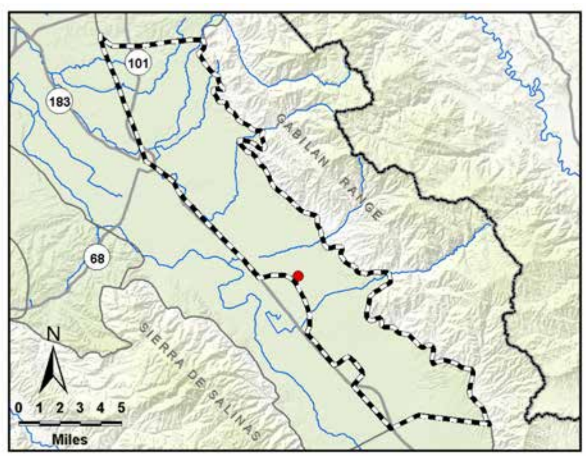
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-27G01

Eastside Aquifer Subbasin

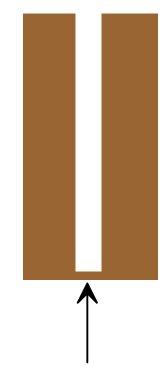


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (189 FT MSL)



Perforated interval unknown



Well bottom
-419 feet msl

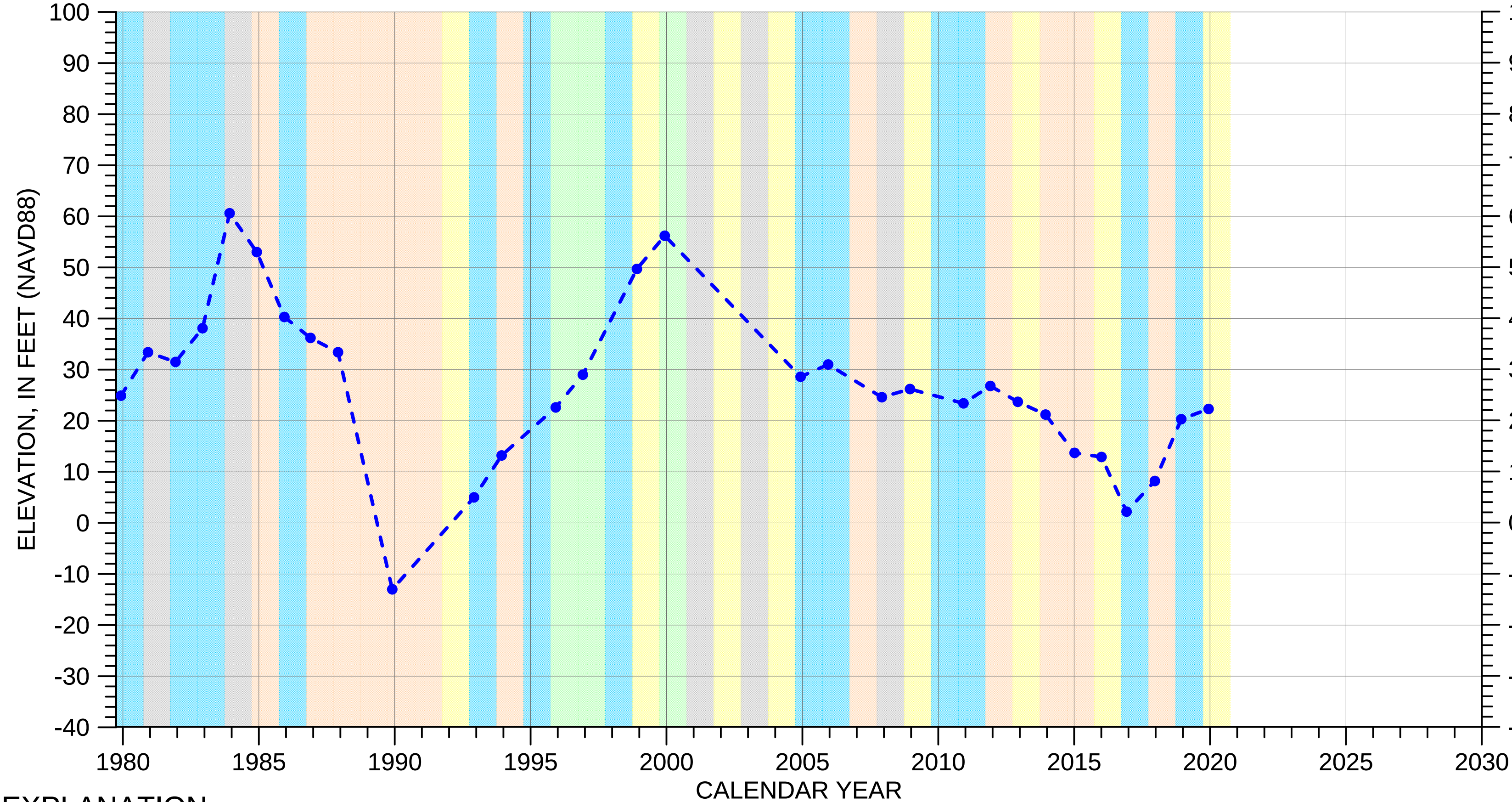
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Plot43 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-36H01

Eastside Aquifer Subbasin



EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (334 FT MSL)

WATER YEAR TYPE DESIGNATION

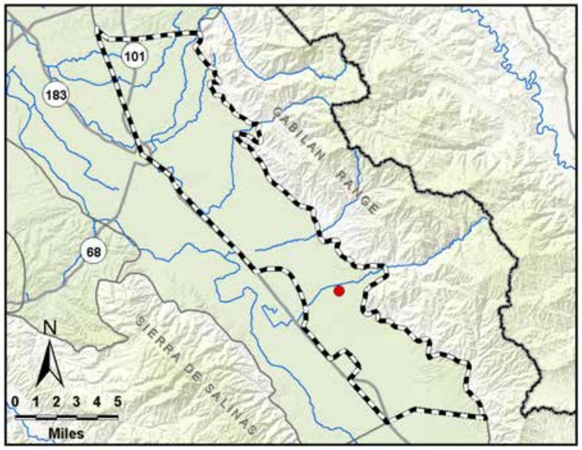
DRY

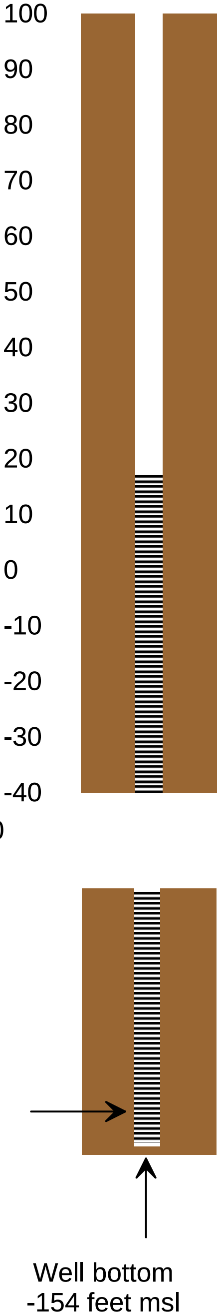
DRY - NORMAL

NORMAL

WET - NORMAL

WET

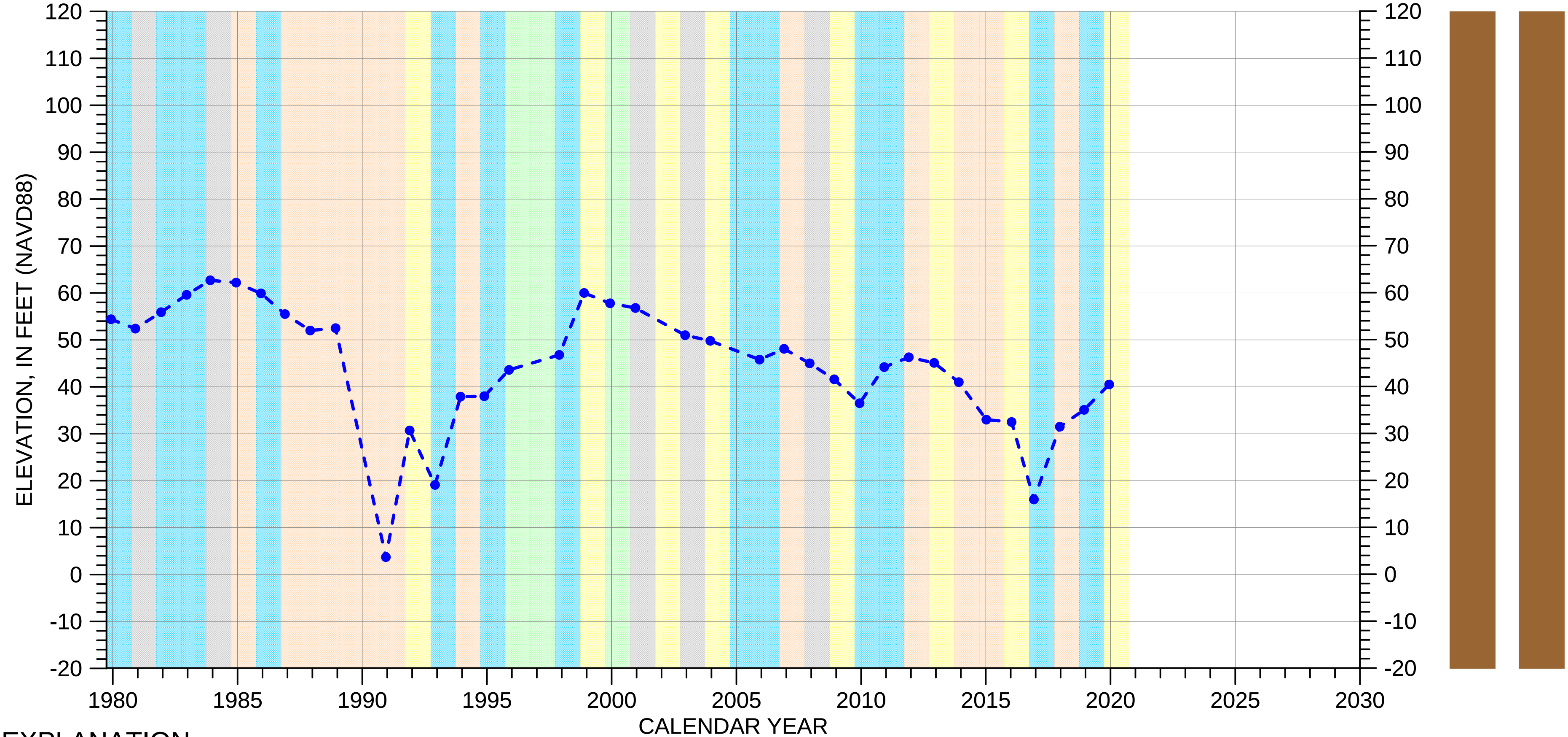




Plot44 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/04E-02Q03

Eastside Aquifer Subbasin



EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (136 FT MSL)

WATER YEAR TYPE DESIGNATION

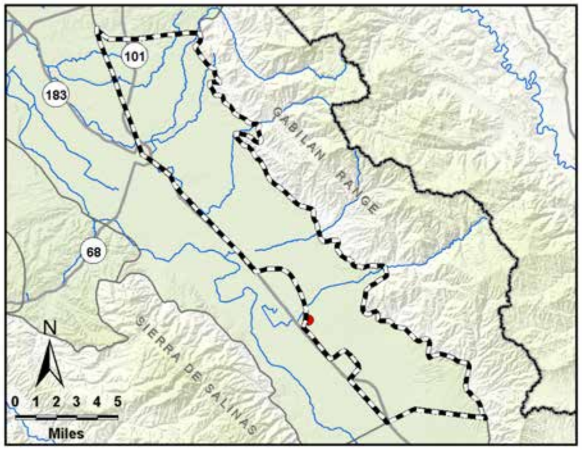
DRY

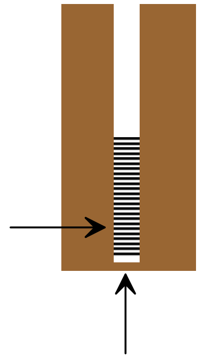
DRY - NORMAL

NORMAL

WET - NORMAL

WET

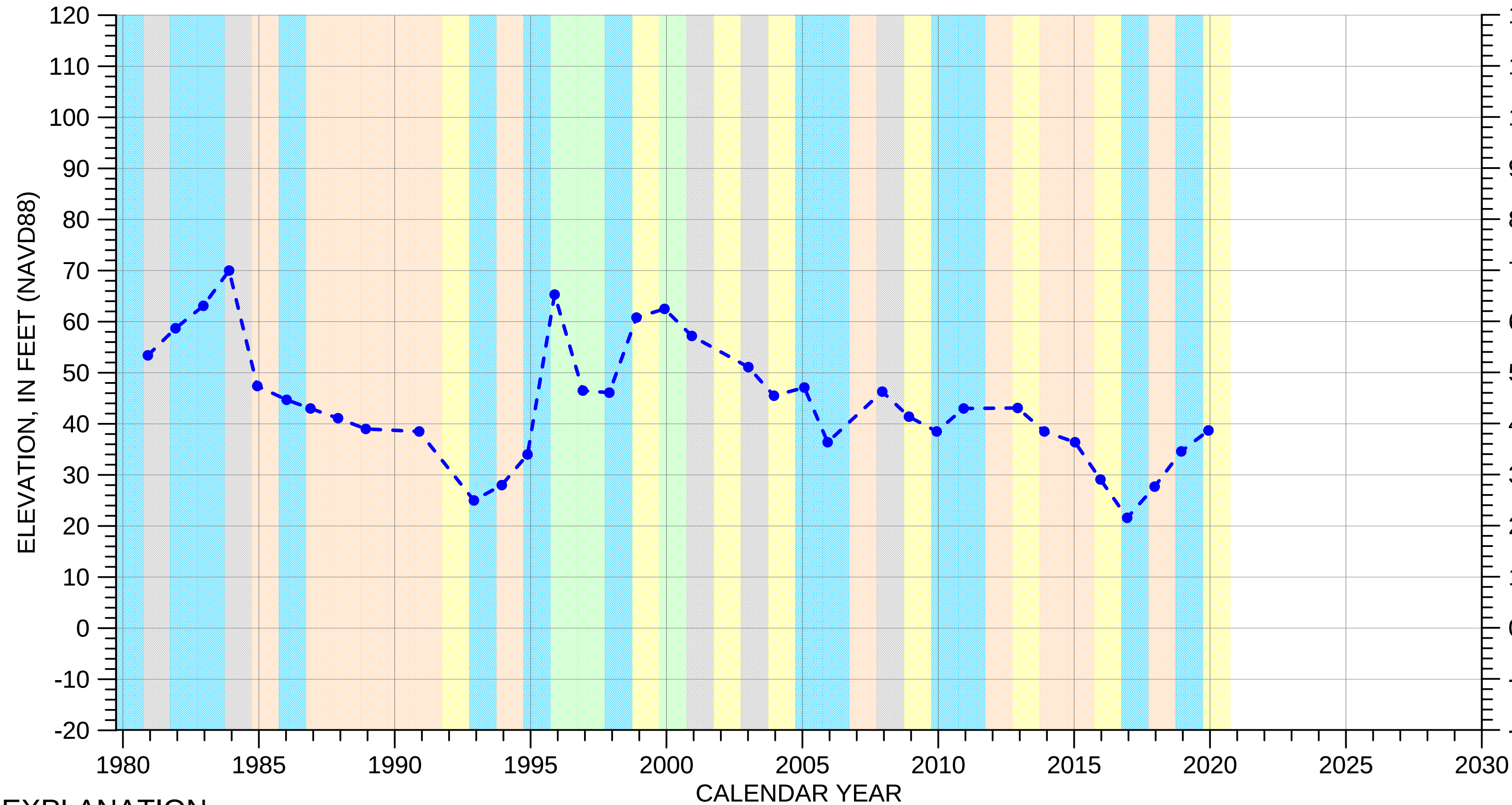


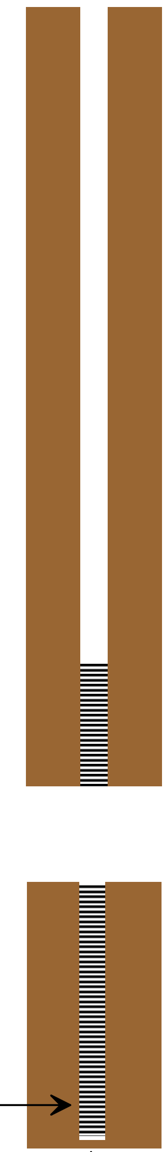


Plot45 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/05E-05N01

Eastside Aquifer Subbasin



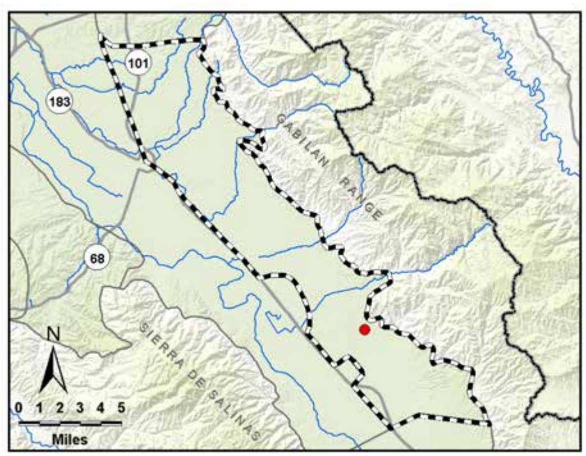


EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (248 FT MSL)



Multiple perforated intervals from 2 to -291 feet msl

Well bottom -302 feet msl

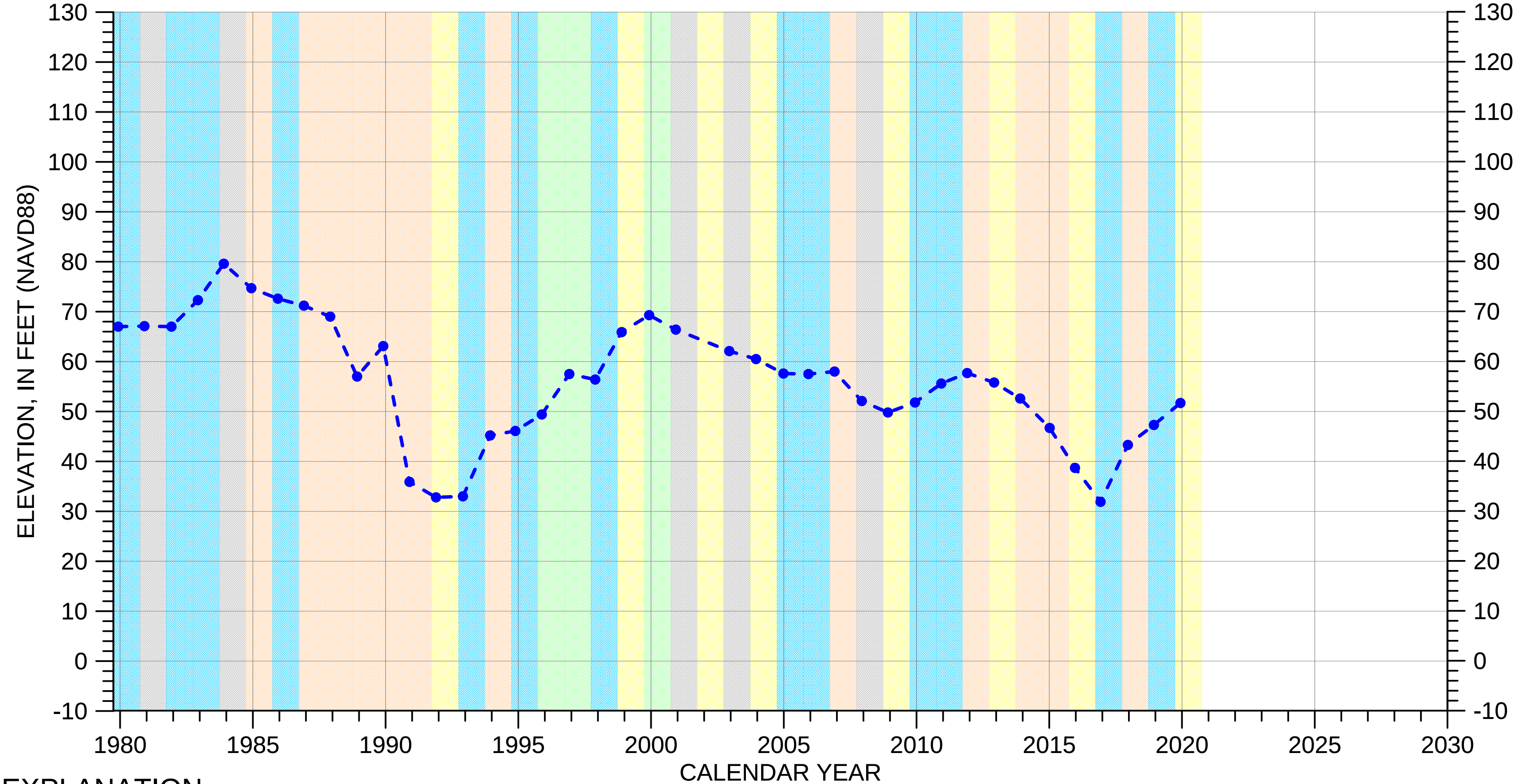
WATER YEAR TYPE DESIGNATION

DRY
DRY - NORMAL
NORMAL
WET - NORMAL
WET

Plot46 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/05E-07G01

Eastside Aquifer Subbasin

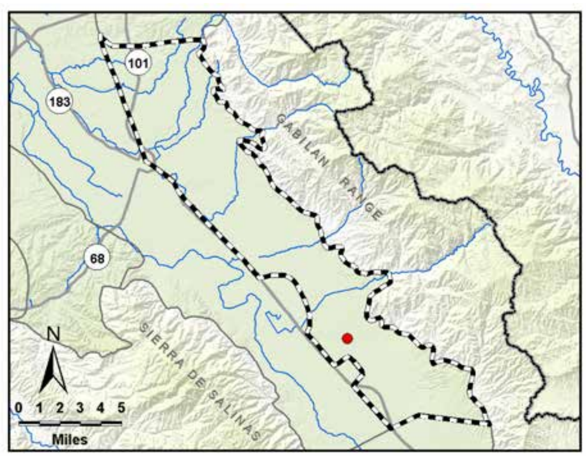


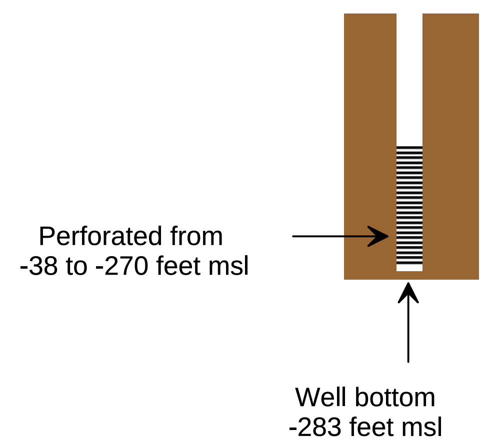
EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (193 FT MSL)





WATER YEAR TYPE DESIGNATION

DRY

DRY - NORMAL

NORMAL

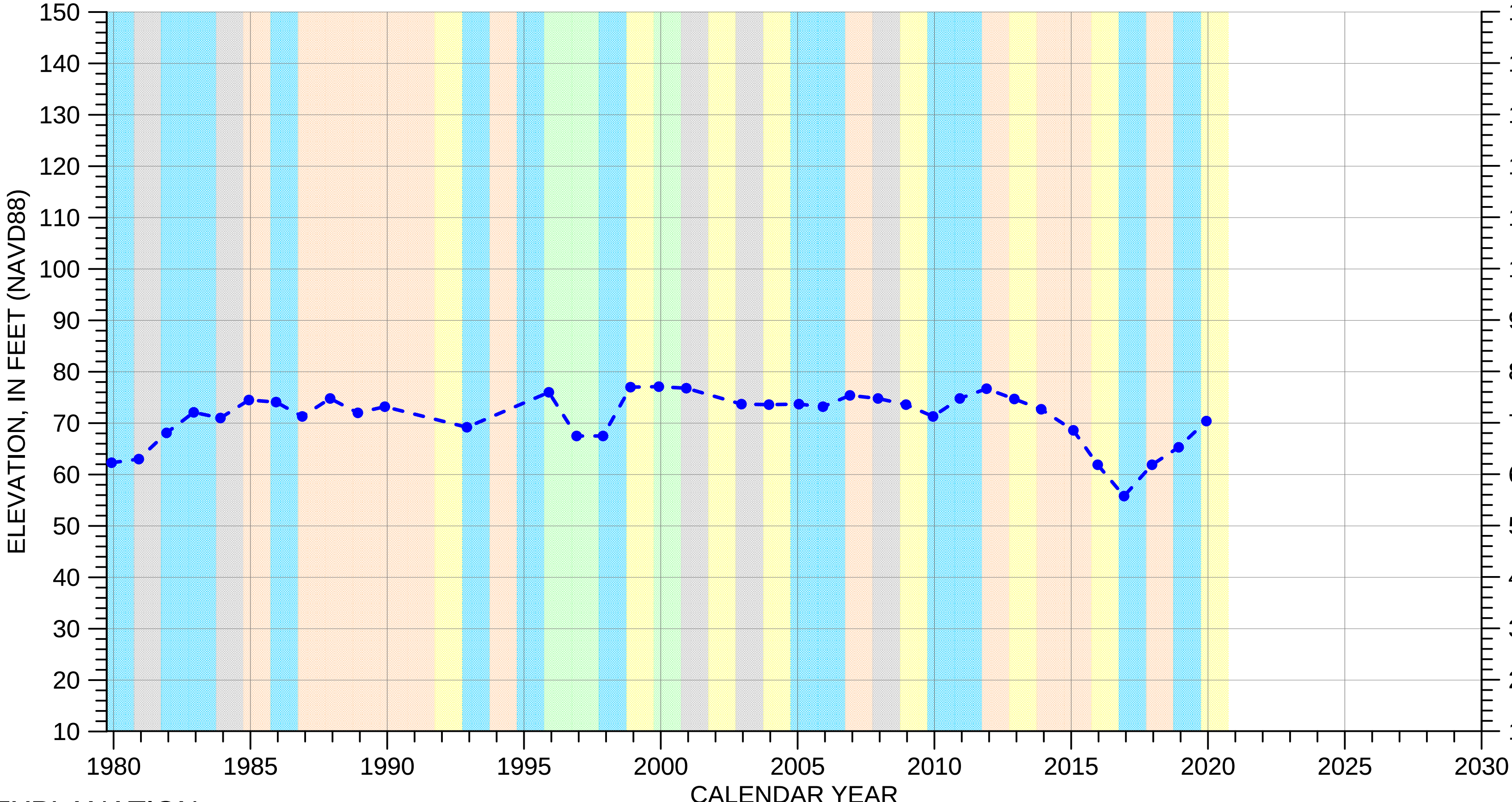
WET - NORMAL

WET

Plot47 *

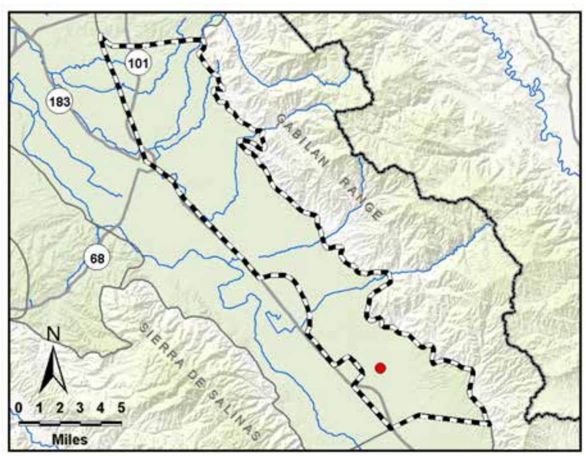
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/05E-17R01

Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (181 FT MSL)



Perforated interval unknown

Well bottom
-118 feet msl

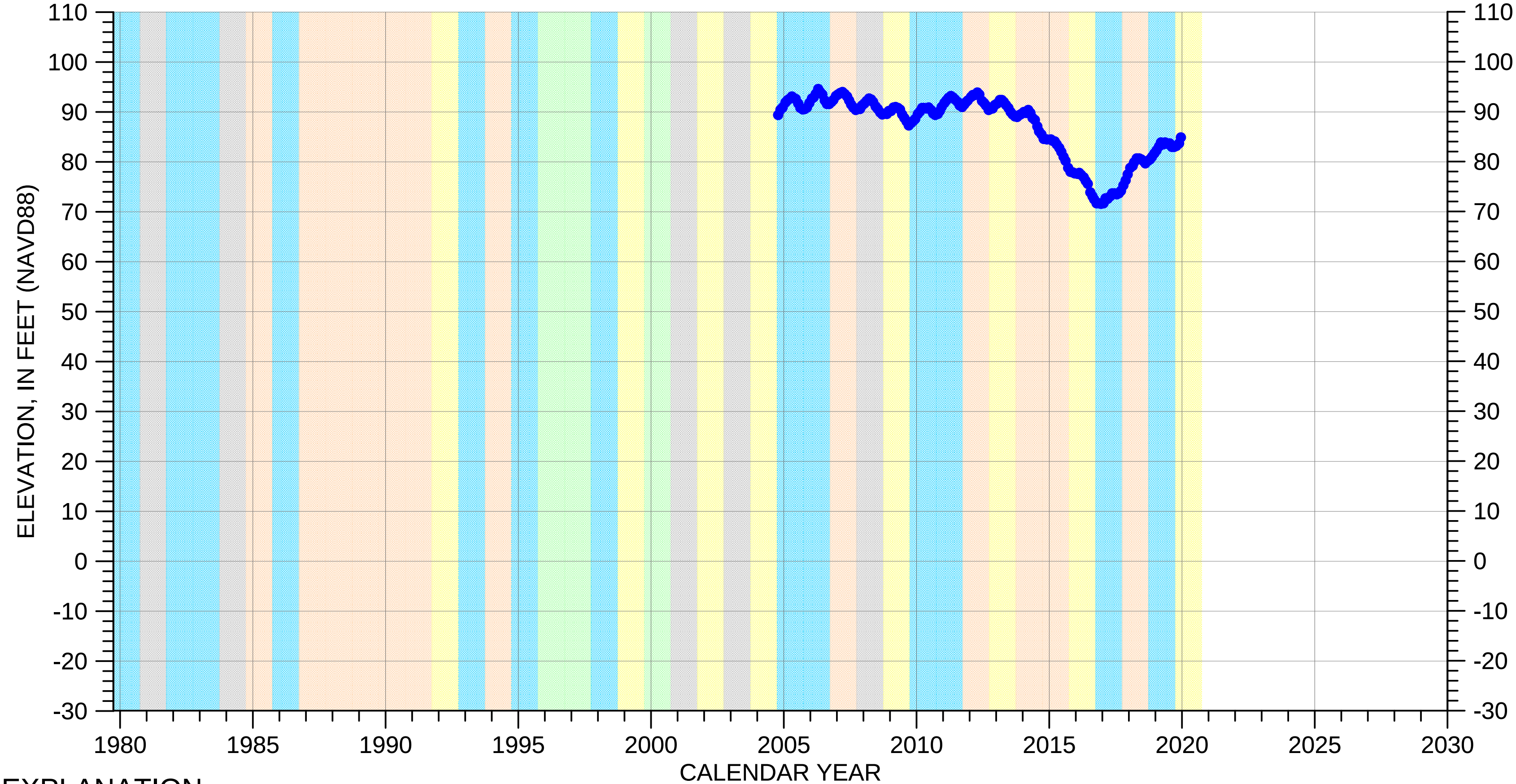
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

Plot48 *

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/05E-27G01

Eastside Aquifer Subbasin

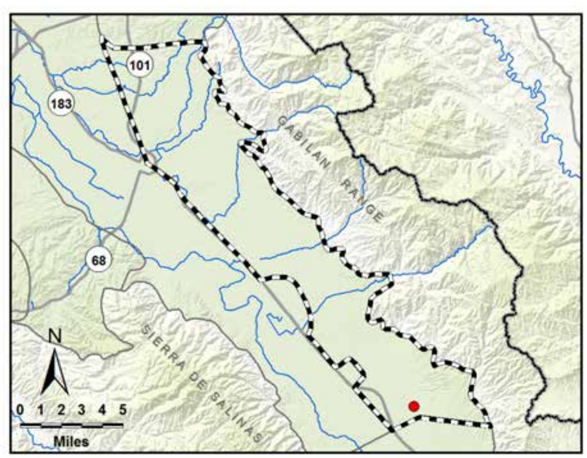


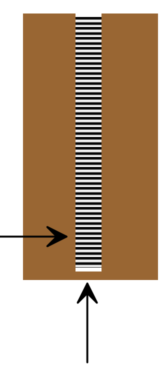
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (272 FT MSL)

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





Plot49 *

Chapter 5
Appendix 5-B

COC Exceedance Maps

MONTGOMERY
& ASSOCIATES

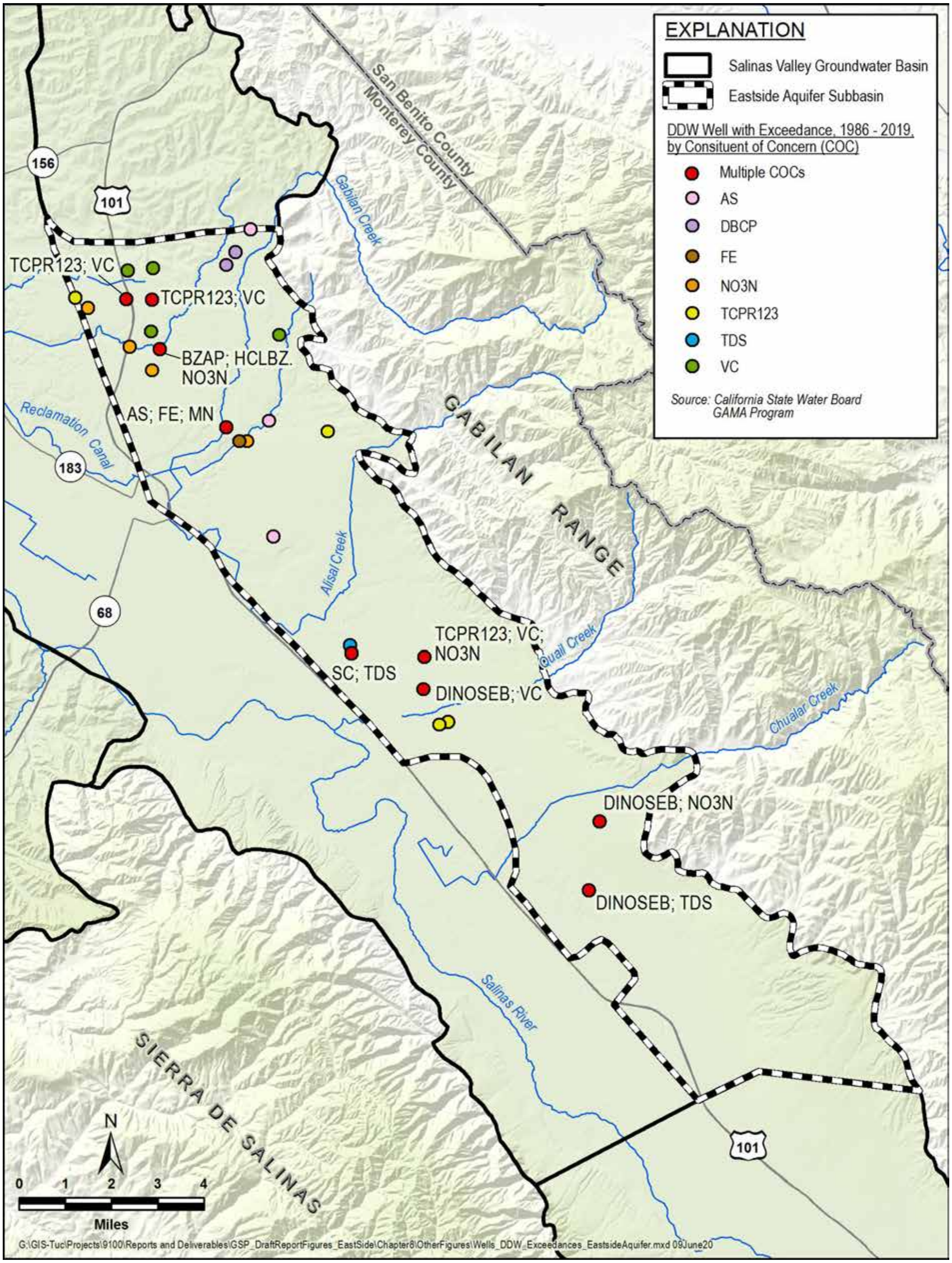


Figure 1. Water Quality Exceedances for DDW Wells

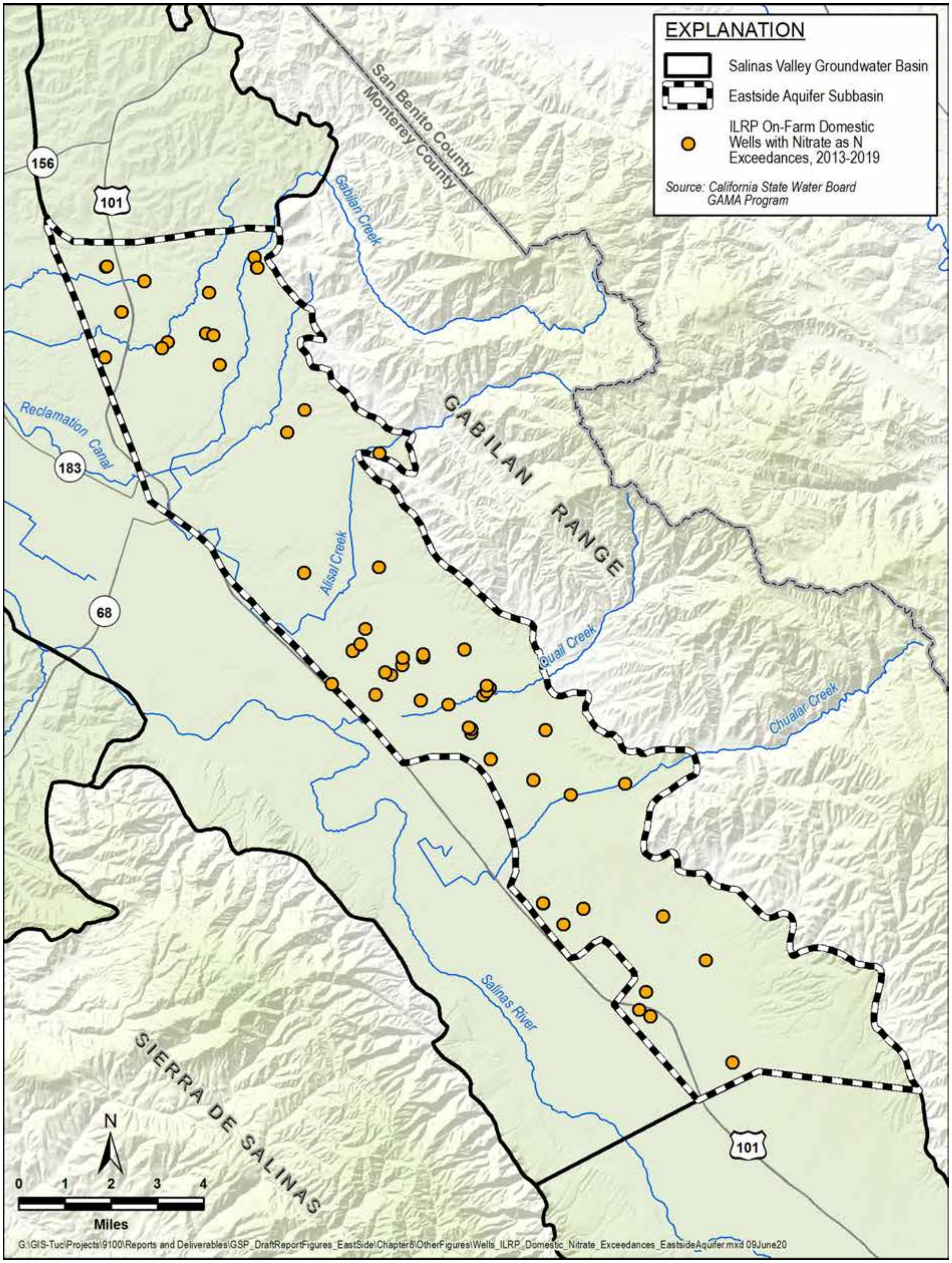


Figure 2. Nitrate Exceedances for ILRP On-Farm Domestic Wells

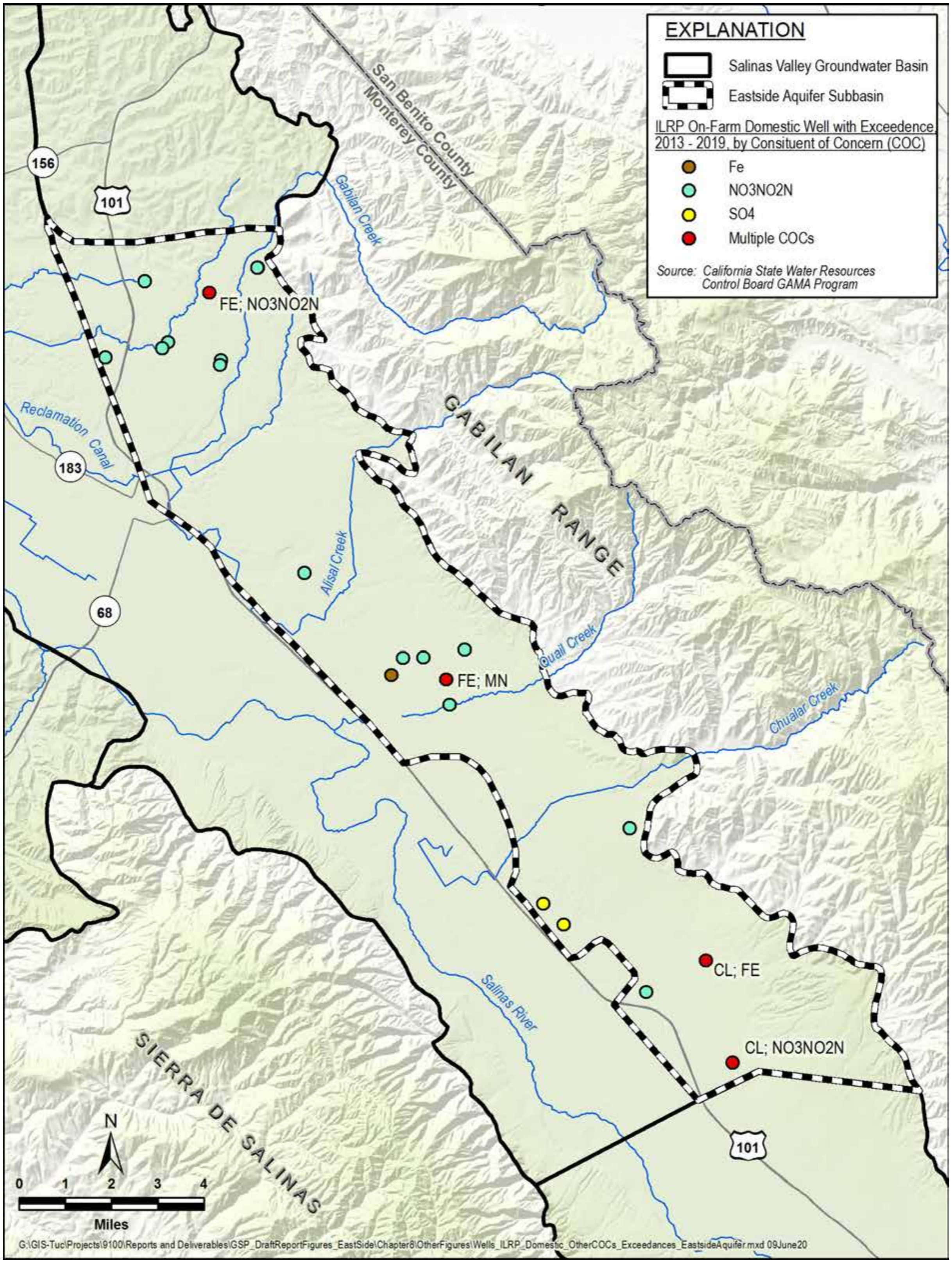


Figure 3. Exceedances for other Constituents of Concern for ILRP On-Farm Domestic Wells

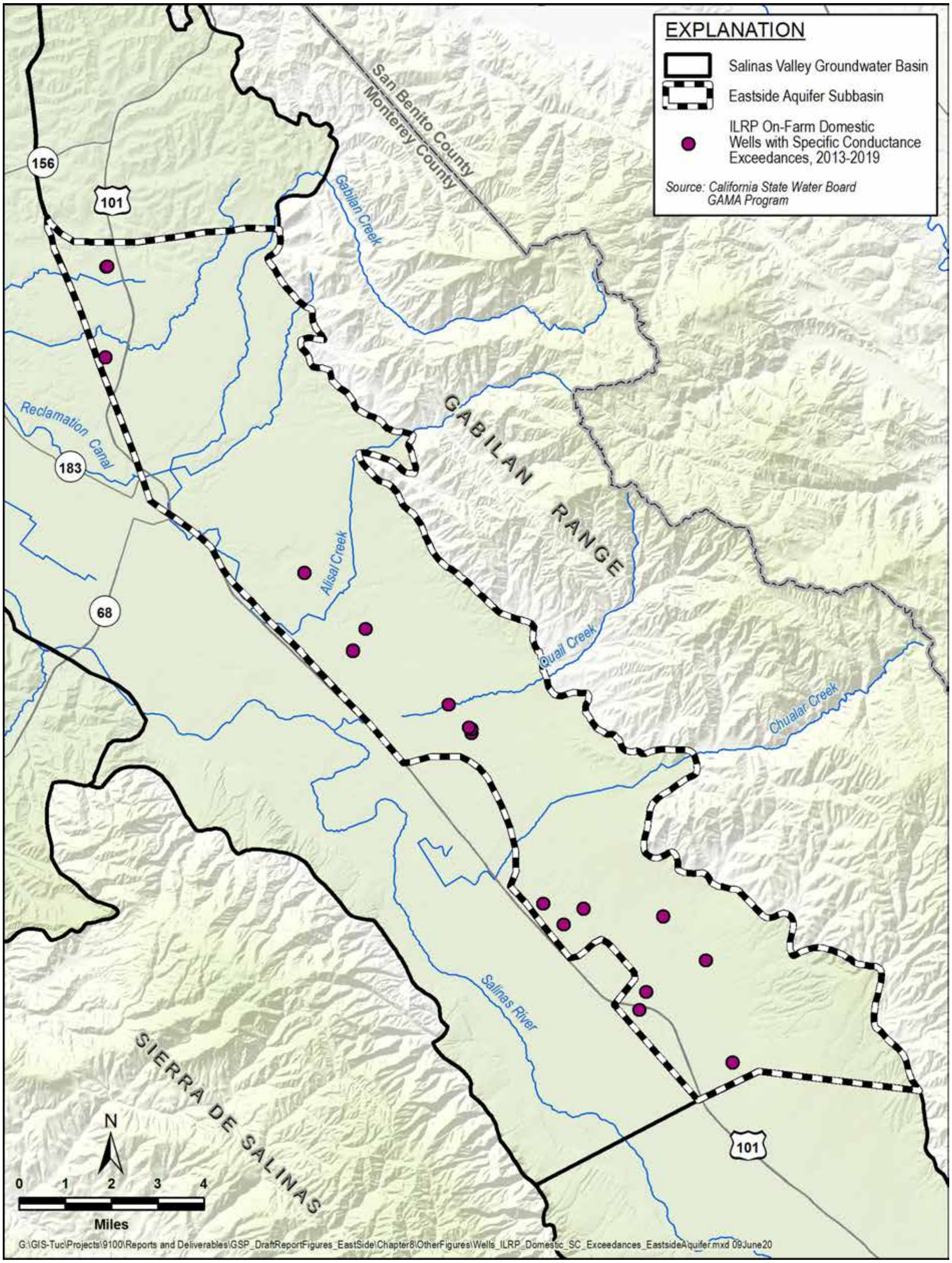


Figure 4. Exceedances for Specific Conductance for ILRP On-Farm Domestic Wells

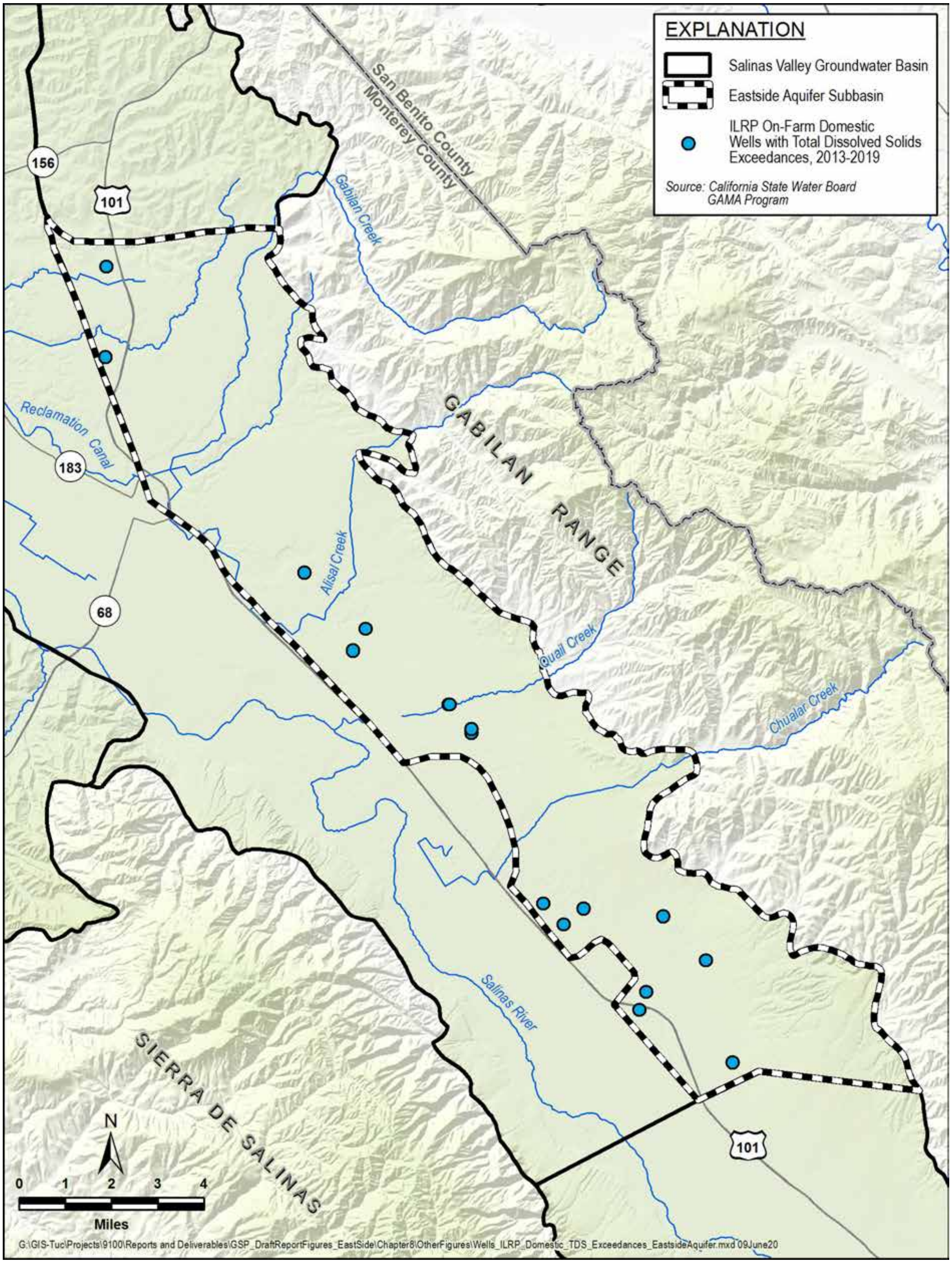


Figure 5. Total Dissolved Solids Exceedances for ILRP On-Farm Domestic Wells

MONTGOMERY & ASSOCIATES

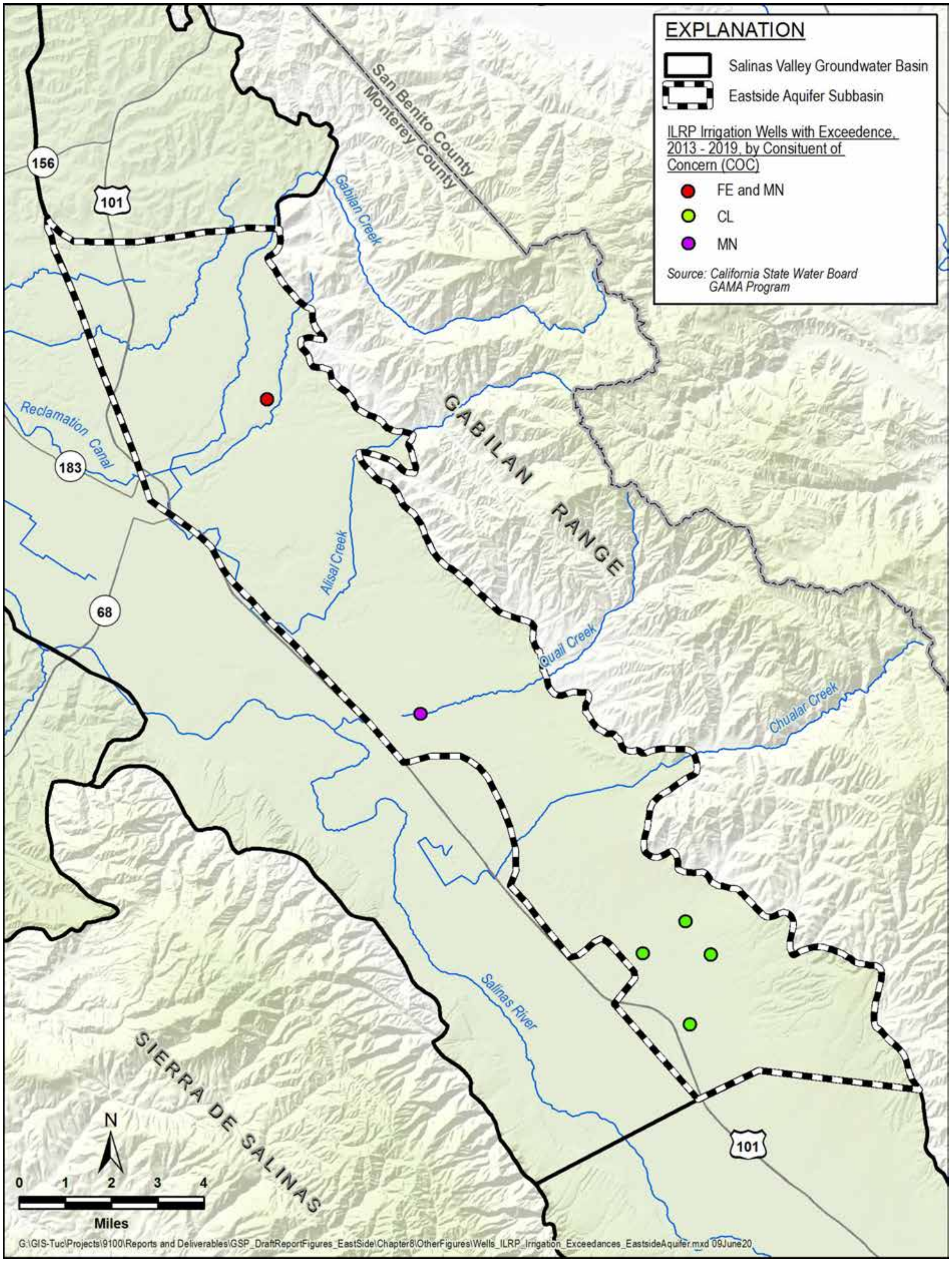


Figure 6. Water Quality Exceedances for ILRP Irrigation Wells

Chapter 6
Appendix 6-A

Salinas Valley Models Project Progress Report

United States Department of the Interior

U. S. GEOLOGICAL SURVEY
California Water Science Center
6000 J Street. Placer Hall
California State University
Sacramento, California 95819-6129
Phone: (916) 278-3000 **Fax: (916)** 278-3231
http:\water.usgs.gov

Project Progress Report

November 2, 2021

Wesley Henson, PhD., Project Chief, US Geological Survey California Water Science Center

In cooperation with Monterey County, Monterey County Water Resources Agency, and the Salinas Valley Basin GSA.

Overview of Salinas Valley Models

Introduction

In January 2016, the U.S. Geological Survey California Water Science Center (USGS CAWSC) began collaborating with Monterey County and the Monterey County Water Resources Agency (MCWRA) to create a suite of geologic and hydrologic models. The primary purpose of these models is to inform the County's five-year (2014 – 2018) hydrologic study of the water supply and groundwater quality in the MCWRA's Zone 2C, within the Salinas Valley Aquifers as part of a settlement agreement (Monterey County 2010). The suite of models include: (1) a geologic model to estimate aquifer properties and aquifer and aquitard extents; (2) a watershed model to simulate surface processes and inflows to the groundwater basin from adjacent catchments; (3) an integrated hydrologic model of the Salinas Valley Groundwater Basin; and (4) an operational reservoir model. The Salinas Valley models will contribute to several other regional modeling efforts: for MCWRA's Interlake Tunnel Project, the development of Groundwater Sustainability Plans under the State's Sustainable Groundwater Management Act (SGMA; CADWR, 2014), and a future water supply risk assessment for the Salinas and Carmel River Basins Study (SCRBS) by the U.S. Bureau of Reclamation (2015) in cooperation with local partners.

Salinas Valley model development and use in these studies are keystones of regional drought planning tools for managing conjunctive use of groundwater and surface water. These models provide vital information for evaluating strategies to achieve groundwater sustainability. These decision tools provide estimates of groundwater storage, surface and subsurface storage and flows, groundwater-surface water (GW-SW) interactions, and hydrologic and agricultural budgets. In addition, the cooperative research partnership between the Monterey County Water Resources Agency and the USGS has resulted in development of model update utilities, cutting-edge reservoir simulation and land use methods, and SGMA reporting utilities that will benefit multiple California modeling efforts.

The purposes of this project update are to (1) describe the model development (2) describe how model results are used to understand seawater intrusion, water levels (hydraulic heads), and land use, (3) provide an overview of the model review process and anticipated completion timeline, and (4) discuss how modeling results and future model updates can be used in ongoing and future hydrologic investigations in the basin.

Model development and Updates

Model development has been a collaborative process with regular guidance and input from Monterey County, MCWRA, and their consultants. Additional guidance and review were provided by an independent Technical Advisory Committee with regional stakeholders, consultants, agricultural commissioners, and the Salinas Valley Basin Groundwater Sustainability Agency.

The models were constructed using published open-source modeling software. The Salinas Valley integrated hydrologic model (SVIHM) and Salinas Valley Operational Model (SVOM) are built using the latest version of MODFLOW-OWHM (Boyce and others, 2020) with the MODFLOW Farm Process (Schmid and others (2006), Schmid and Hanson (2009)). The software can be downloaded in its entirety here, https://code.usgs.gov/modflow/mf-owhm. You can also find helpful information on this webpage https://www.usgs.gov/software/modflow-one-water-hydrologic-flow-model-conjunctive-use-simulation-software-mf-owhm. The SVIHM has been developed using two sub-models, a 3-D geologic framework and texture model (Salinas Valley Geologic Model; SVGM; Sweetkind and others, In Prep), and a Hydrologic Simulation Program – Fortran watershed model (HSPF; Bicknell and others, 1997) for the entire Salinas Valley Watershed (Salinas Valley Watershed Model, SVWM).

Geologic Framework and Texture Model

The geologic framework model was used to define the spatial extent, depth, and distribution of geologic material textures for the offshore region, five major aquifers of the Salinas Valley, aquitards between each aquifer, and the depth to bedrock. The aquifers are defined consistent with previous studies and include the surficial aquifer, 180-ft aquifer, 400-ft aquifer, Purisima aquifer, and Paso Robles aquifer.

Each of the aquifers was explicitly defined using well borehole data, and local geologic investigations (Tinsley, 1975; Feeney and Rosenberg, 2003; Kennedy/Jenks, 2004; Hanson and others, 2002; Colgan and others, 2012; Langenheim and others 2012, Hanson and Sweetkind, 2014; Taylor and Sweetkind, 2014; Hanson and others, 2014a; Baillie and others, 2015;). The distribution of texture in each aquifer was developed for each borehole location and kriged to create a continuous surface. These depth-discrete spatial layers for each aquifer were used to define a geologic texture for each model cell as a percentage of coarse material (K_{coarse}). This method has been widely used in hydrologic models (Faunt and others, 2009a; Faunt and others, 2009b; Faunt and others, 2010) to relate geologic texture to hydraulic properties. This approach defines aquifer properties using a coarse-grained (K_{coarse}) and fine-grained (K_{fine}) end member defined as:

$K_{fine}=1.0-K_{coarse}$

Hydraulic conductivity ranges for each aquifer were defined using data from previous models (Hanson and others, 1990; Hanson and Benedict, 1993; Hanson and others, 2003, 2004, 2014 a,c,d,e; Sweetkind and others, 2013; Phillips and others, 2007; Faunt and others, 2009a,b; Ludington and others, 2007; MCWRA monitoring well database), aquifer tests, and estimated ranges for geologic materials.

The hydraulic conductivity value at the upper extent of the range is assigned to cells in areas where the percentage of coarse material is 100% (K_{coarse} =1.0). Similarly, the hydraulic conductivity value at the lower extent of the range is assigned to cells in areas where the percentage of coarse material is 0% (K_{fine} = 1.0). For all other model cells, a composite hydraulic conductivity was generated using a power law relationship between the values for the K_{coarse} and K_{fine} end members.

Data from previous offshore studies (Johnson and others, 2016) were used to define the structure, distribution, and properties of the offshore region. The offshore region was parameterized similarly to the onshore region of the model domain providing continuity between the offshore and onshore regions of each aquifer that facilitates a robust estimation of fluxes between the offshore and onshore areas of each aquifer.

Climate data

Climate data for the SVWM and SVIHM include minimum and maximum air temperature, precipitation, and potential evapotranspiration. Climate data for both models were developed using the Basin Characteristics Model (BCM) tools (Flint and others, 2004; Flint and Flint, 2007 a,b,c) from national climate data stations (for example, Daly and others, 2004) and data from the California Irrigation Management System stations (CIMIS, 2005). The BCM tools were used to develop daily spatially distributed 270-m resolution climate datasets for the future climate scenarios. Climate input datasets are precipitation, maximum and minimum air temperature, and solar radiation; the latter two are used to compute evapotranspiration.

Climate input were developed as spatially distributed grids. Gridded data were interpolated onto the model grid using an area-weighted approach. For the SVWM, the 270-m climate data were interpolated onto the hydrologic response units (HRUs). For the SVIHM, the 270-m climate grids were interpolated onto the model grid.

Salinas Valley Watershed Model

The (SVWM) simulates watershed processes for the entire Salinas River watershed (figure 1). The model simulates the historical period between 10/1/1948 - 9/30/2018. Each sub-catchment in the domain was defined as a hydrologic response unit (HRU). Hydrologic processes simulated for each HRU include evapotranspiration, runoff, interflow and baseflow. Each HRU is connected to stream segments and tributaries that represent a drainage network to route surface waterthrough the SVWM from upland areas to the Pacific Ocean. Streamflow in each stream segment is simulated using the kinematic wave method. The simulation includes the discharge volume, stream velocity, stage, and water volume for the segment, as well as stream losses from evaporation and streamchannel infiltration.

The SVWM combines the BCM tools and HSPF models to simulate the climate and hydrology for the upland areas and tributaries draining into the alluvial valleys simulated by the SVIHM. The SVWM domain consists of an upper Salinas Valley subarea and lower Salinas Valley subarea simulated as sub-catchments connected at the location of USGS streamgage 11150500 (SALINAS R NR BRADLEY CA, https://waterdata.usgs.gov/nwis/uv?site_no=11150500), with all surface water outflows from the upper SVWM entering the lower SVWM as Salinas River streamflow at the location of the streamgage. The upper SVWM includes five sub-watershed areas that contain most of the Paso Robles area of the Upper Salinas

River Valley in San Luis Obispo County area, while the lower SVWM contains most of the SVIHM area within its five sub-watershed areas.

Salinas Valley Watershed Model Domain

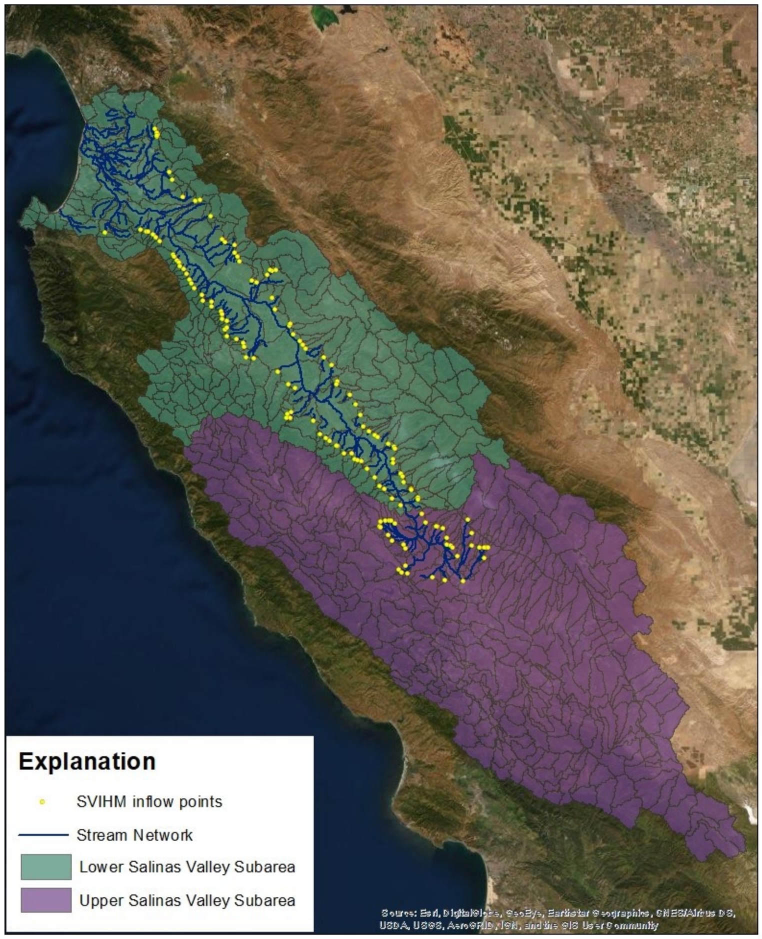


Figure 1: Salinas Valley Watershed Model (SVWM) domain showing Upper and Lower Salinas Valley Subareas, stream network, and inflow points where watershed flows are routed into the Salinas Valley Integrated Hydrologic Model (SVIHM).

Spatial discretization of the SVWM was based on topographically defined watersheds that were subdivided into smaller sub-drainage areas using a combination of surface flow-routing defined by a 10-meter digital elevation model (DEM) and pre-defined sub-drainages (CalWater version 2.2.1, Department of Forestry and Fire Protection, http://frap.fire.ca.gov/data/frapgisdata-sw-calwaterdownload). The smaller sub-drainages were used to (1) represent spatially varying climate and topography in the upland areas of the SVWM model domain, and (2) define pour points to route estimated ungaged flows from the SVWM to the SVIHMstream networks. The SVWM spatial discretization resulted in HSPF segments varying in area from 65 acres to about 25,000 acres and a total of 148 pour-point connections for inflows from upstream drainagesalong the Salinas Valley.

The HSPF model is run as a continuous simulation using an hourly time step; however, in the current

SVWM version, the daily climate inputs are uniformly distributed to hourly values. Therefore, only daily results are used for calibration and for developing SVIHM inflows.

SVWM model parameters were developed using geographic information system (GIS) data sets that included: DEM-derived elevation, slope and aspect, estimated soil water storage capacity (State Soil Survey Geographic ((SSURGO), Web Soil Survey, available online at https://websoilsurvey.nrcs.usda.gov/), percent forest canopy and impervious land cover (National Land Cover Data, NLCD; U.S. Geological Survey, 2007, 2011, 2014). For discrete data such as land cover type, GIS analysis was used to calculate the weighted average values for each HSPF parameter based on the fractional area of a given discrete data value within each HSPF segment. The fractional areas for discrete data are calculated in GIS, and the weighted averages are calculated in spreadsheets, resulting in a unique set of HSPF parameters for each model segment. This method provided a better representation of the physical watershed characteristics for each segment as compared to simply using the dominant discrete data within each segment. Continuous data such as slope and percent canopy cover were mapped directly to HSPF segments as area-average values using GIS.

The SVWM was used to estimate inflows into the Salinas Valley from adjoining ungaged watersheds. These inflows are provided as a monthly inflow time series to the SVIHM. Although the model is only used to estimate ungaged watershed inflows to the SVIHM, the SVWM is calibrated for the entire basin, providing many opportunities for future evaluations where surface water and sediment and nutrient transport are of greater concern than groundwater storage. These potential applications will be discussed in the section on Future model updates, applications, and developments.

Salinas Valley Integrated Hydrologic Model

The Salinas Valley Integrated Hydrologic Model (SVIHM) is an integrated water resources management tool that simulates the conjunctive use of groundwater and surface-water in the Salinas Valley (Figure 2). The Salinas Valley model simulates the period between 10/1/1967 to 9/30/2018 and has been calibrated for the period from 10/1/1967 to 12/31/14. The SVIHM includes explicit representation of climate, groundwater and surface water, recharge, runoff, inflows from ungaged watersheds, reservoir releases, Salinas River diversions, municipal and industrial water supply pumping, and a rigorous simulation of the substantial Salinas Valley agricultural industry.

The SVIHM is built using the latest version of MODFLOW-OWHM (Boyce and others, 2020) with the MODFLOW farm process. OWHM simulates water supply and demand for natural, urban, and cultivated lands. OWHM uses an embedded land use and crop model based on the widely used FAO56 method (Allen and others, 2005) to estimate water demands for a set of user-specified land uses. If precipitation and direct groundwater root uptake are insufficient to meet simulated land use water demands, then additional supplies can be provided to meet the deficit (groundwater pumping, surface water diversions, wastewater reclamation, and reservoirs). Additionally, for cultivated lands, water demand efficiencies can be specified for land-use type, irrigation type, climate regime (wet or dry), and region. This well-developed model framework facilitates evaluation of water demand by region, crop, and climate regime and allows for scenario testing to evaluate the effects of potential changes in agricultural practices, increases in efficiency, and optimization of agricultural development within the basin. This tool is well suited for the analyses that will be needed throughout the next century to manage sustainability of the Salinas Valley aquifer system.

Salinas Valley Integrated Hydrologic Model Domain

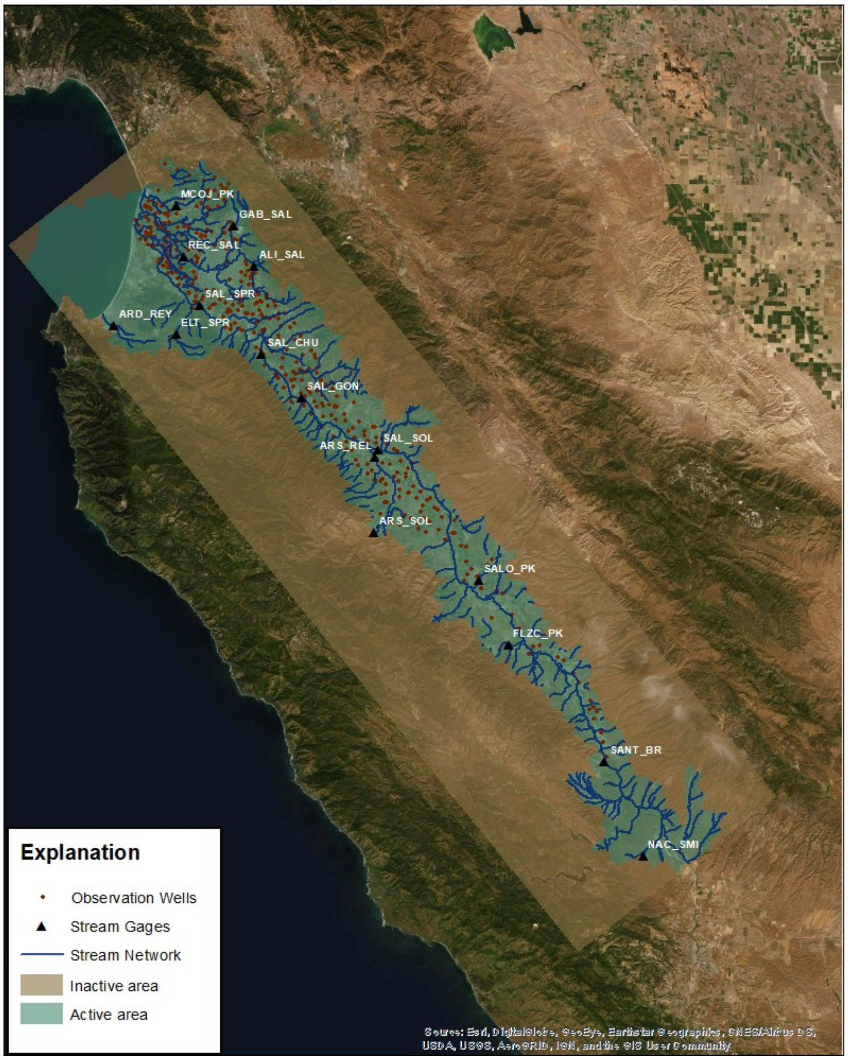


Figure 2: Salinas Valley Integrated Hydrologic Model (SVIHM) showing domain extent with inactive and active areas, stream network, stream gages, and observation wells.

The total active modeled area in the SVIHM is 10,266 mi^2. The model grid is uniform, where each grid cell is approximately 6.42 acres (529-by-529 ft). There are 976 rows, 567 columns, and 9 layers having a varying number of active cells in each layer, for a total of 265,382 active model cells. To assess changes in aquifer storage due to seawater intrusion, the model includes approximately 84,000 active cells onshore and 11,000 active cells offshore. The SVIHM includes nine model layers that correspond to locally defined hydrostratigraphic units such as the defined aquifers (180-Foot and 400-Foot aquifers), confining units, and geologic units (e.g., basement bedrock). The top of SVIHM is represented by the altitude of the land surface, but because hydrostratigraphic units are discontinuous across the study area, the uppermost active layer is a composite of model layers 1, 3, 5, 7, and 9.

The SVIHM is partitioned into 31 water balance subregions (WBS; Figure 3 and Table 1). Each WBS has simulatedwater demands for each land use and a unique set of available water supplies that can be used by the model to meet the demands. The model includes WBS representing the Zone 2C jurisdictional area and associated subareas, the Castroville Seawater Intrusion Project (CSIP) area, Seaside Basin, and areas outside the Zone 2C boundary but within the SVIHM model domain.

Table 1. Summary of water-balance subregions within the Salinas Valley Integrated Hydrologic Model, Monterey and San Luis Obispo Counties, California. (SW= Surface water, GW = Groundwater, None = No Deliveries).

Water Balance Subregion	Region Name	Region Description	Irrigation Water Supply
1	Riparian Corridor	Monterey and SLO Counties	None
2	CSIP Area	Castroville Seawater Intrusion Project Region	GW/SW/recycled water
3	Coastal Urban areas	Salinas, Castroville, Marina, Seaside, Sand City, Monterey, Del Rey Oaks	None
4	Inland Urban areas	Chualar, Gonzales, Soledad, Greenfield, King City, & San Ardo	None
5	Highlands South	North of Eastside outside of Zone 2C	GW
6	Granite Ridge	North of Eastside outside of Zone 2C	GW
7	Corral De Tierra	South of Pressure part within Zone 2C	GW
8	Blanco Drain Area	Drain subarea within Pressure subarea of Zone2C	GW
9	East Side	Remainder of Eastside subarea in Zone2C	GW
10	Pressure Northeast	Pressure subarea NE of Salinas River in Zone 2C	GW
11	Pressure Southwest	Pressure subarea SW of Salinas River in Zone 2C	GW
12	Forebay Northeast	Forebay subarea NE of Salinas River in Zone 2C	GW
13	Forebay Southwest	Forebay subarea SW of Salinas River in Zone 2C	GW
14	Arroyo Seco	Subarea SW of Salinas River outside of Zone 2C	GW
15	Clark Colony	Subarea SW of Salinas River partly outside of Zone 2C	SW/GW
16	Upper Valley Northeast	Upper Valley subarea NE of Salinas River and northeast of King City in Zone 2C	GW
17	Upper Valley Northwest	Upper Valley subarea NW of Salinas River and west of King City in Zone 2C	GW
18	Upper Valley Southeast	Upper Valley subarea SE of Salinas River and east of King City in Zone 2C	GW
19	Upper Valley Southwest	Upper Valley subarea SW of Salinas River and west of King City in Zone 2C	GW
20	Below Dam	Subregion below Nacimiento Dam and within Zone 2C	GW

21	Westside Region	Westside Regions of SVIHM outside of Zone 2C boundary in Monterey County Inland Southwest of Arroyo Seco and Clark Colony subregion	GW
22	Hames Valley	Outside Zone 2C but in Monterey County	GW
23	NE Quarries	Outside Zone 2C but in Monterey County	GW
24	Northeast Region	Northeast Regions of SVIHM outside of Zone 2C on the Northeast side of the Eastside, Granite Ridge, and Highlands South subregions	GW
25	Southwest Region	Southwest regions of SVIHM outside of Coastal Pressure subregion Zone 2C boundary in Monterey County	GW
26	Northeast Region	Northeast Region of SVIHM outside of Zone 2C Forebay subregion in Monterey County	GW
27	Southwest Region	Southwest regions of SVIHM outside of the Upper Valley and Forebay regions subregions of Zone 2C in Monterey County plus outside of Arroyo Seco, Hames Valley, and SLO active subregions	GW
28	Southeast Region	Southeast Region of SVIHM outside of Below Dam and Upper Valley subregions of Zone 2C boundary in Monterey County	GW
29	Paso Robles Region	Remainder of Paso Robles Basin in active model grid in San Luis Obispo County	GW
30	Seaside Basin	Seaside Adjudicated Basin (landward only)	GW
31	Offshore	Offshore (groundwater analysis only)	None

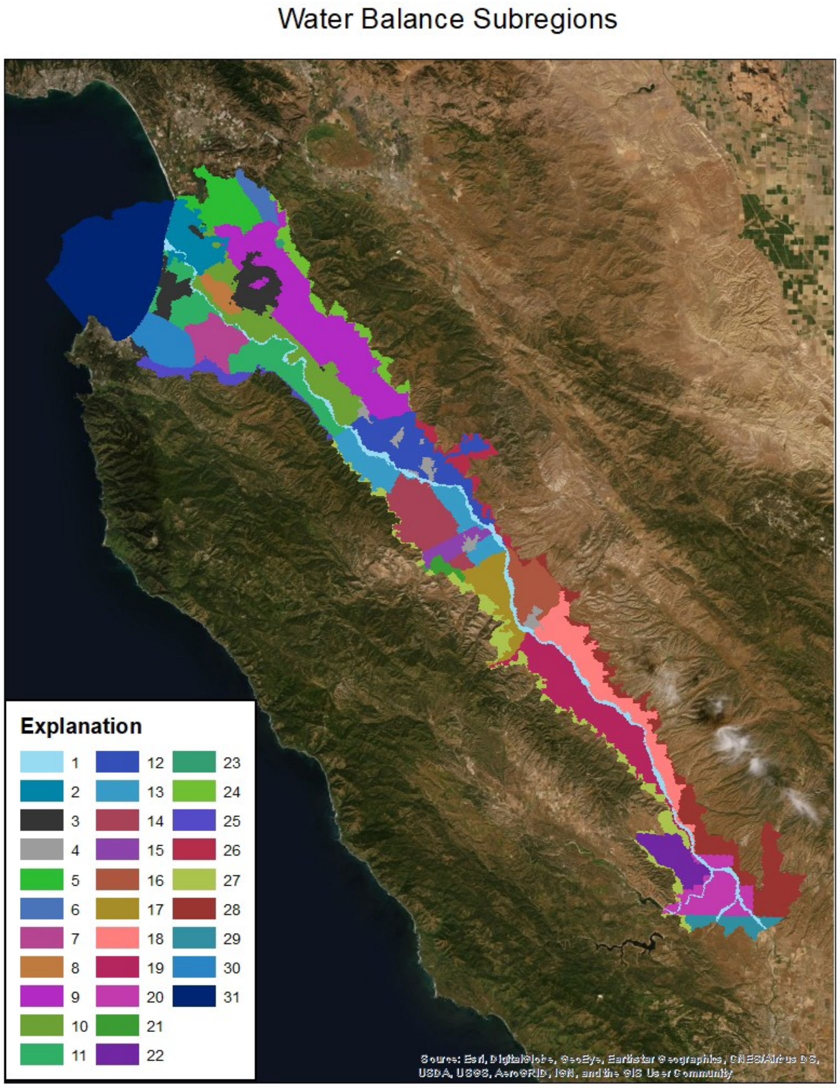


Figure 3: Salinas Valley Integrated Hydrologic Model Water Balance Subregions.

The SVIHM has 56 specified land use types (Table 2), each with defined water sources, irrigation type and efficiency (if applicable), and crop water demand properties (crop coefficients, area, crop development timeline). For each model year, two six-month land use maps were generated using a composite of available land use data from California Department of Water Resources, Monterey County, and the National Land Cover Database (NLCD, U.S. Geological Survey, 2014) and a newly developed method that leverages the California Pesticide Use Reporting (CalPUR) database.

The new CalPUR method is used to provide greater detail about the distribution of crops within areas with vague land use types such as “truck and vegetable crops” (Henson and others, in Prep). This approach captures complex cultivation methods including multi-cropping and crop rotations, providing a rich dataset for estimating agricultural water demands.

Table 2: Salinas Valley Integrated Hydrologic Model (SVIHM) Land Use Types

Land Use Type		Land Use Type		Land Use Type	
1	Celery – coastal	20	Root vegetables – inland	39	Outdoor nurseries – coastal
2	Celery – inland	21	Tomato/pepper – coastal	40	Outdoor nurseries – inland
3	Cucumber/melon/squash – coastal	22	Tomato/pepper – inland	41	Indoor nurseries
4	Cucumber/melon/squash – inland	23	Strawberries – coastal	42	Artichokes
5	Legumes – coastal	24	Strawberries – inland	43	Pasture
6	Legumes – inland	25	Corn – coastal	44	Non-irrigated
7	Lettuce – coastal	26	Corn – inland	45	Semi-agricultural
8	Lettuce – inland	27	Field crops – coastal	46	Idle/fallow
9	Rotational 30-day – coastal	28	Field crops – inland	47	Ag-trees
10	Rotational 30-day – inland	29	Grain crops – coastal	48	Golf course turf/parks
11	Crucifers/cabbages – coastal	30	Grain crops – inland	49	Urban
12	Crucifers/cabbages – inland	31	Cane/bush berries – coastal	50	Quarries
13	Unspecified irrigated row crops – coastal	32	Cane/bush berries – inland	51	Water
14	Unspecified irrigated row crops – inland	33	Deciduous fruits and nuts – coastal	52	Riparian
15	Carrots – coastal	34	Deciduous fruits and nuts – inland	53	Upland grasslands/shrub lands
16	Carrots – inland	35	Citrus/subtropical – coastal	54	Woodlands
17	Onions/garlic – coastal	36	Citrus/subtropical – inland	55	Beach/dunes
18	Onions/garlic – inland	37	Vineyards – coastal	56	Barren/burned
19	Root vegetables – coastal	38	Vineyards – inland		

The SVIHM was calibrated using over 63,098 monthly observations including: 1,738 measurements from the MCWRA observation well network (Figure 2); 6,448 streamflow measurements of at 17 streamgages (Figure 2 and Table 3); 127,683 monthly reported groundwater extraction values; and 162 reported monthly diversions. In addition, calibration included second-order observations of streamflow differences between gages and vertical hydraulic head differences between aquifers with multiple nested observation wells.

Table 3: Stream gage information showing Gage ID, U.S. Geological Survey National Water Information System (NWIS) gage number and gage name.

Gage ID	NWIS Gage Number	Gage Name
ARS_SOL	11152000	ARROYO SECO NR SOLEDAD CA
ARS_REL	11152050	ARROYO SECO BL RELIZ C NR SOLEDAD CA
SAL_SOL	11151700	SALINAS R A SOLEDAD CA
ELT_SPR	11152540	EL TORO C NR SPRECKELS CA
SAL_CHU	11152300	SALINAS R NR CHUALAR CA
ALI_SAL	11152570	ALISAL C NR SALINAS CA
SANT_BR	11150500	SALINAS R NR BRADLEY CA
SAL_SPR	11152500	SALINAS R NR SPRECKELS CA
SALO_PK	11151500	SAN LORENZO C A KING CITY CA
NAC_SMI	11149500	NACIMIENTO R BL NACIMIENTO DAM NR BRADLEY CA
REC_SAL	11152650	RECLAMATION DITCH NR SALINAS CA
GAB_SAL	11152600	GABILAN C NR SALINAS CA
ARD_REY	11143300	ARROYO DEL REY A DEL REY OAKS CA
FLZC_PK	11150700	FELIZ CYN TRIB NR SAN LUCAS CA
MCOJ_PK	11152700	MORO COJO SLOUGH TRIB NR CASTROVILLE CA
SAL_GON	11152200	SALINAS R NR GONZALES CA

In collaboration with MCWRA and the Pajaro Valley Water Management Agency, self-updating model tools have been developed which allow temporal datasets of MODFLOW-OWHM models to be updated using spreadsheets with updated temporal data. This approach is an improvement that allows models to continue to be updated and useful for the wide range of resource questions and scenarios that arise. These self-updating model tools can be used to update or correct input data describing climate data, ungaged inflow data, land use properties, observed hydraulic heads, groundwater extraction, wastewater reclamation, surface water diversions, reservoir releases, and agricultural pumping, irrigation types and efficiencies. All these updates can be completed without rebuilding the entire model. Model updates are described in the section “Future model updates, applications, and developments”.

Salinas Valley Operational Model

The Salinas Valley operational model (SVOM) uses the Surface Water Operations Module of MODFLOW-OWHM. This implementation of reservoir operations is based on a wealth of prior publications (Ferguson and others 2015; Ferguson and others, 2016; Hevesi and others, 2019; Hanson and others, 2020; Boyce and others, 2020). The SVOM is a baseline model that is used to evaluate water supply projects such as the reservoir modification and changes to operations to aide with groundwater sustainability efforts. The SVOM is similar to the SVIHM for simulation of hydrologic processes, surface and subsurface properties, and simulation of agricultural operations. In this model, the land use is fixed to 2014, the time step is shorter, about five to six days, and the reservoir operations are explicitly simulated. The reservoir operations rules are human readable text files that formulate the logic for the current mandated operational rules for conservation, water supply, flood mitigation, and water rights. These operations include fish passage rules that support the life cycle of threatened steelhead fish populations. These input data just translate existing flow charts and figures from the approved operations into text that the model can read in. These data are available from MCWRA upon request, both in the form used in the model and in public documents.

Model Representation of Seawater Intrusion, Groundwater Levels and Land Use

The following descriptions of methods are provided to illustrate how the model will inform future evaluations of Seawater Intrusion, groundwater sustainability evaluations and scenarios, and responses to changes in land use and climate.

Seawater Intrusion

Interactions with onshore freshwater aquifers and near-shore saltwater aquifers are driven by contrast in aquifer hydraulic heads and pore water densities between freshwater and seawater and the distribution of aquifer permeability along the coast. Seawater Intrusion (SWI) is estimated in the SVIHM as flux across the coastal boundary. The monthly elevation of the 9413450 NOAA Station buoy in Monterey Bay is used as a proxy for the sea water elevation (H_{sw}). In the model, the sea level is simulated as an equivalent freshwater head (h_{fw}) using the following relation from Motz (2005):

$$h_{fw} = \frac{\rho_{sw}}{\rho_{fw}} h_{sw} - \left(\frac{\rho_{sw} - \rho_{fw}}{\rho_{fw}} \right) Z$$

where

h_{fw} is the seawater's equivalent freshwater hydraulic head at elevation Z (L),

ρ_{sw} is the seawater density (M/L^3),

ρ_{fw} is the freshwater density (M/L^3), and

Z is the elevation point where the equivalent freshwater head is calculated (L).

Similar to other models in the region (Hanson, 2003a,b), the freshwater-seawater interface is simulated as general head boundary (GHB), that is, a boundary that depends on the aquifer hydraulic heads along the coast. To specify an ocean boundary condition with the GHB, the sea level is converted to an equivalent freshwater head at the model cell's center. The density of seawater is assumed to have an average value of 1,025 kg/m^3, and the density of freshwater is assumed to be 1,000 kg/m^3 (Motz, 2005). When hydraulic head in an aquifer is greater than h_{fw} along the coast, hydrologic flows are seaward. Conversely, when hydraulic head in an aquifer is less than h_{fw} along the coast, seawater intrusion into the aquifer occurs. The net annual flux values along the coastline for each aquifer are simulated by the SVIHM to inform interpretation of chloride monitoring by MCWRA.

Although these estimates do not provide information about the onshore spatial extent of SWI, the model is well-poised to be used to provide this information in future model updates and applications. These more explicit methods will be described in the Future model updates, applications, and developments section.

Groundwater Elevations

The SVIHM and SVOM estimate groundwater elevations using well-developed methods of the MODFLOW framework. MODFLOW uses the method of finite differences to solve the groundwater flow equation for each model cell. This approach assumes Darcian flow that is based upon hydraulic gradients within and among aquifers and the spatial distribution of hydraulic conductivity. Additional boundary conditions or processes that can increase or decrease hydraulic heads in the model are simulated such as barriers to flow (for example, faults), groundwater extraction (for example, municipal and agricultural pumping), stream-aquiferinteractions, sea water intrusion, and recharge.

After successful calculation of the hydraulic head in each aquifer, well depth-weighted composite heads are developed for wells screened in multiple aquifers. Composite- and single-well aquifer values for the simulated and observed hydraulic heads are compared. If the comparison between simulated and observed hydraulic heads is reasonable, the spatial distribution of simulated aquifer hydraulic heads provides another source for evaluating groundwater elevations and complements independently developed groundwater contour maps by MCWRA.

Land Use

Land use will be updated in future updates of the SVIHM using available spatial datasets and the CalPUR method to attribute vague land use categories. As new spatial data become available, they can be prioritized in the composite land use map and replace co-located data. The process for developing land use input data has four steps: develop a composite map, enhance map with CalPUR data, interpolate onto model grid, and generate the input files. In the future, new land use properties may need to be developed for new crop types not already represented in the current version of the historical model. An example of the 2017 land use map is provided to illustrate the representation of land use for every year in the model (Figure 4).

Salinas Valley Integrated Hydrologic Model 2017 Land Use

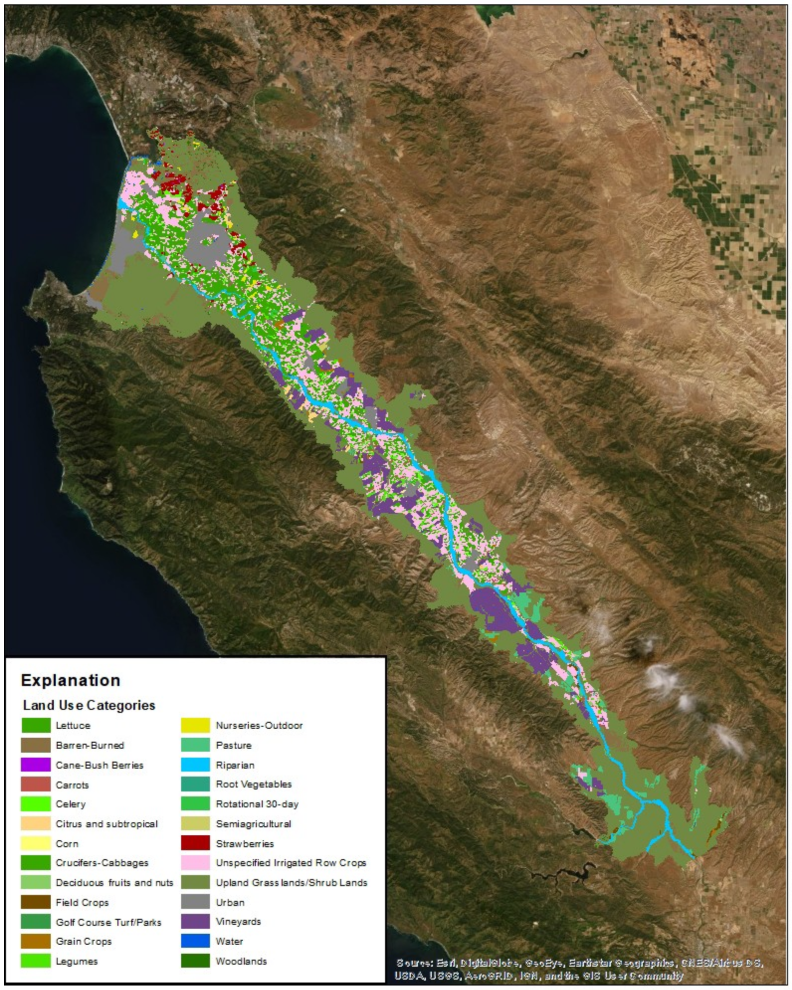


Figure 4: Salinas Valley Integrated Hydrologic Model (SVIHM) 2017 land use.

Model Review and Public Release

The model public release will consist of three elements: (1) a report about geologic and development and calibration of hydrologic models, (2) a data release with SVGM model input files and metadata, and (3) a data release with SVWM, SVIHM, and SVOM model input files and metadata in a public repository. The SVWM and SVIHM reports will document how the historical models were constructed. The SVOM report will include a description of the adaptations to the SVIHM to generate a baseline reservoir operations model, describe reservoir model implementation, and document implementation of rules. The report and data releases will be publicly available after completion of fundamental science review by the USGS. The USGS fundamental science review has multiple levels of scientific and technical review. These include technical, scientific, editorial, and regional review. This review ensures complete and accurate documentation of model development and results before data are potentially used for decision-making. The model is undergoing final calibration and has been updated through water year 2018. Final calibration is occurring simultaneously with report development.

The Salinas Valley models have been developed to address additional applications for ongoing regulatory and management efforts. A comprehensive 51-year climate, surface and groundwater, agricultural and reservoir operations model of the entire Salinas Valley is a substantial effort that warrants and benefits greatly from a sufficient technical review. This review provides a rigorous basis for further tool development and refinement and scenario testing. The technical review has been enhanced by use and further development of the Salinas Valley Suite in two regional projects, (1) the WaterSMART water supply vulnerability study cooperatively funded in partnership with the U.S. Bureau of Reclamation and (2) the Interlake Tunnel project. The WaterSMART Study includes forecast and analysis framework to evaluate conditions to 2100 for multiple possible climates, socio-economic growth scenarios, projects, and conservation strategies in the Salinas Valley and region. The Interlake Tunnel benefit analysis facilitated the operational model development which will benefit future project evaluations for years to come. These applications of the model allowed for more rigorous review of model input data, better implementation of important processes, and improved representation of land use.

Every effort is being made to publish the models within the estimated timeframe. However, it is important to note that the initial model scope was to address specific concerns about historical conditions for the Monterey County Basin Investigation. Since the start of project, the models have been refined with better representation wells and updated with four additional years of critical climate, land use, water supply, and reservoir storage, that represent drought recovery between 2014 and 2018. These data allow for (1) better representation of stakeholder conservation efforts that are essential for evaluation of water budgets and potential sustainability projects, (2) a longer duration for evaluation of operations, and (3) many updates to model input data sets to better represent the groundwater well network.

The Salinas Valley hydrologic model suite development has leveraged a unique opportunity to benefit multiple projects for stakeholders throughout the entire Salinas Valley. Although the technical review and model development has taken longer than anticipated, the value-added information and consistent analysis framework for these concurrent studies benefits both stakeholders and the models. As presented at the Model Workshop, the SVIHM is expected to be submitted for USGS Specialist Review in winter 2021-2022

Future model updates, developments, and applications

The SVWM and SVIHM will need annual updates to keep the models relevant for evaluating and reporting sustainability efforts for Sustainable Groundwater Management Act (SGMA) compliance or for use with other future projects. Updates to the SVIHM conceptual model, aquifer parameters, and input data facilitate timely SVOM updates, so that reservoir operations can continue to be refined to meet stakeholder needs. The SVWM and SVIHM will require periodic calibration to maintain model accuracy with potential changes in hydrology, climate, and land use. The model can also be improved with additional stakeholder support and refined to keep the model relevant to decision-making.

MCWRA and USGS continue to develop workflows and train staff to use model update tools. These self-updating model tools can convert MCWRA hydrologic data into model input. However, climate, land use, observation, extraction, diversion, and reservoir release datasets require some development. Data describing observed hydraulic heads, municipal and industrial groundwater extraction, wastewater reclamation, reported diversions, reservoir releases, and reported agricultural pumping are readily available in various MCWRA and Monterey County databases and require monthly aggregation and conversion to model units. These tools facilitate a model framework that can be readily updated with minimal lag time with support from the USGS.

PRISM climate data and climate station data are used to generate spatially distributed temperature, precipitation and potential evapotranspiration estimates using the BCM tools. There is a six-month lag time for some of these climate datasets. Climate data are used in the SVWM to develop ungaged watersheds inflows to the valley.

Land use will be updated in future updates of the SVIHM using available spatial datasets and the CalPUR method to attribute vague land use categories. As new spatial data become available, they can be prioritized in the composite land-use map and replace co-located data. The process for developing land-use input data will be to develop a composite map, enhance with CalPUR data, map onto model grid, and generate the input files. Additionally, new land use properties may need to be developed for new crop types not already represented in the current version of the historical model. As remote sensing technologies, such as satellite multi -spectral data analysis, are developed and refined alternate approaches to assigning time series crop water demand will be evaluated for future model updates.

The SVWM can be extended to look at nutrient and sediment loading and transport in the Salinas River watershed. This could be a powerful tool for soil conservation, nutrient evaluations, and water quality assessments. The SVWM can also be used to examine changes in runoff and recharge in response to land surface change. This can be a useful tool for initial assessments of potential surface storage sites, habitat restoration and flood flows.

The SVGM provides a basis for evaluating aquifer structure, evaluation of faults and other structures that may influence subsurface flow paths and facilitate interpretation of geophysics such as airborne electromagnetic (AEM) surveys.

The SVIHM can be extended to provide insights into several county initiatives: (1) assessment of Sea Water Intrusion (SWI) and contaminant transport, (2) evaluation of conceptual models of potential interactions between 180-ft and 400-ft aquifers (3) evaluation of optimal monitoring network expansion, (4) uncertainty estimates for important hydrologic predictions (SWI, GW-SW interactions, recharge).

The SVIHM could be extended to evaluate Sea Water Intrusion (SWI) more completely. Currently the model examines net volumes of landward flow from the ocean. In order of increasing effort, other options for SWI evaluation include particle tracking, the sharp water interface Modflow package (SWI2, Bakker and others 2013)), and coupled simulation of sea- and fresh water such as SEAWAT (Guo and Langevin, 2002; Langevin, 2001). The SVIHM geologic texture model, aquifer parameters, and model structure provide a backbone for any of these options for evaluating SWI.

SWI monitoring and analysis by the MCWRA has identified the occurrence of vertical migration of seawater from the overlying intruded Pressure 180-foot aquifer to the Pressure 400-foot aquifer (MCWRA, 2017). More information is needed to understand these interactions among aquifers and aquifer responses to stress. As monitoring and data collection efforts are refined and expanded, along with continued refinement of hydrostratigraphic information, the SVIHM can be used to evaluate new conceptual models of the aquifers and evaluate the aquifer's response under various management scenarios.

Summary

A suite of geologic and hydrologic models has been developed to estimate water supply and availability in the Salinas Valley. These models will be documented and released to the public after completion of review and approval according to USGS fundamental science practices. After publication these models will continue to be updated to support future water management objectives.

Disclaimer

Any use of trade, firm, or product names is for descriptive purposes only and does not imply endorsement by the U.S. Government.

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Chapter 7
Appendix 7-A

Monitoring Procedures from MCWRA CASGEM Monitoring Plan

4.0 Monitoring Procedures

This section addresses the various procedures and protocols involved in collecting, processing, and reporting data from wells in the CASGEM network.

4.1 Monitoring Frequency and Timing

Nineteen (19) of the CASGEM wells are currently, and will continue to be, measured on a monthly basis. The three (3) voluntary wells are also measured monthly. MCWRA will use the monthly measurements from August and either January, February, or March to satisfy the biannual CASGEM reporting criteria.

To determine the monthly distribution of seasonal high and low groundwater elevations, MCWRA analyzed measurements from approximately 50 wells throughout the Salinas Valley Groundwater Basin. This included wells in the 180/400 Foot Aquifer, East Side Aquifer, Forebay Aquifer, and Upper Valley Aquifer. The measurements were collected during eight (8) different Water Years (WY): WY 1985, representative of near normal conditions; WY 1991, representative of dry conditions; and the six most recent Water Years, WY 2009 through WY 2014. MCWRA reports this data on a quarterly basis; a sample report is included in Appendix B.

Based on this analysis of historical data, August is typically representative of seasonal low conditions (Figure 10). A relaxation of groundwater levels, or seasonal high conditions, is evident during the period from January to March (Figure 11). Data from these three months will be evaluated and the highest groundwater elevation from that series will be submitted to the CASGEM online submittal system. The month chosen to be representative of the seasonal high groundwater conditions will be consistent across all data groups.

Nineteen (19) of the CASGEM wells are equipped with pressure transducers which collect depth to water data on an hourly basis. This data will be synthesized so that biannual measurements representing seasonal high and low conditions are available for CASGEM reporting. The groundwater level measurement collected at noon on the fifteenth day of the month will be selected and compared to other monthly data to ensure that it is a representative value. Data from the month of August will be used to represent the seasonal low and a fall/winter measurement from either January, February, or March will be used to represent the seasonal high; the same month will be used as was selected based on monthly well measurements, as discussed above.

Four (4) of the wells in the CASGEM network are currently measured once per year, during the period from November to January. Based on the recent analysis of seasonal groundwater highs, this period will be shifted to cover the months from January through March. An additional measurement event will be added during the month of August for these wells in order to also capture the seasonal groundwater low.

Appendix C contains a summary of the frequency and timing of measurement of wells in the CASGEM network. Any new wells that are brought into the CASGEM program will be monitored on a biannual basis, with data collection occurring on the same schedule as the other wells that are measured twice a year.

4.2 Well Locations

The latitude and longitude of each well was collected using a handheld GPS unit, which has accuracy to within one (1) meter. Coordinates for wells in the CASGEM network are shown in Appendix A. Any wells incorporated into the CASGEM network in the future will be geographically located using a similar method.

4.3 Reference Points

All of the wells that comprise the CASGEM network described herein are currently part of a groundwater level monitoring program conducted by MCWRA. As part of the existing monitoring programs, reference points (RP) have been established for all of the wells. To ensure consistency in measuring depth to water, a description of each well's RP is recorded in a field data collection notebook. In many cases, photographs have also been taken of the RP. Reference point elevations have been determined for all wells that are currently in a monitoring program; this data is listed in Appendix A.

A reference point will be determined for any new wells that are brought into the CASGEM network. Reference point elevations are determined using a digital elevation model from the United States Geological Survey (USGS) with a cell size of 32 feet by 32 feet.

Figure 10 – Distribution of Seasonal High Groundwater Elevations by Month

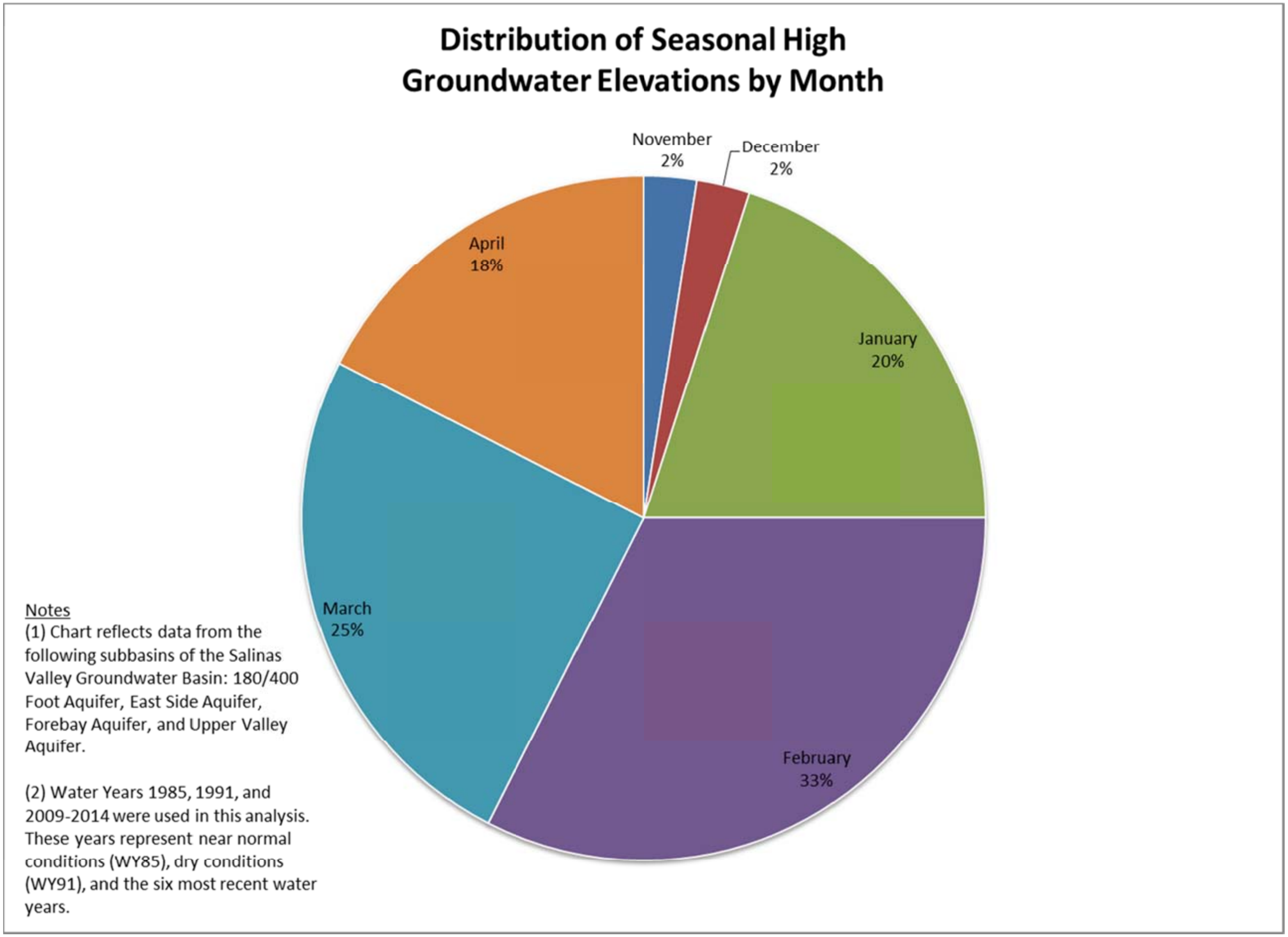
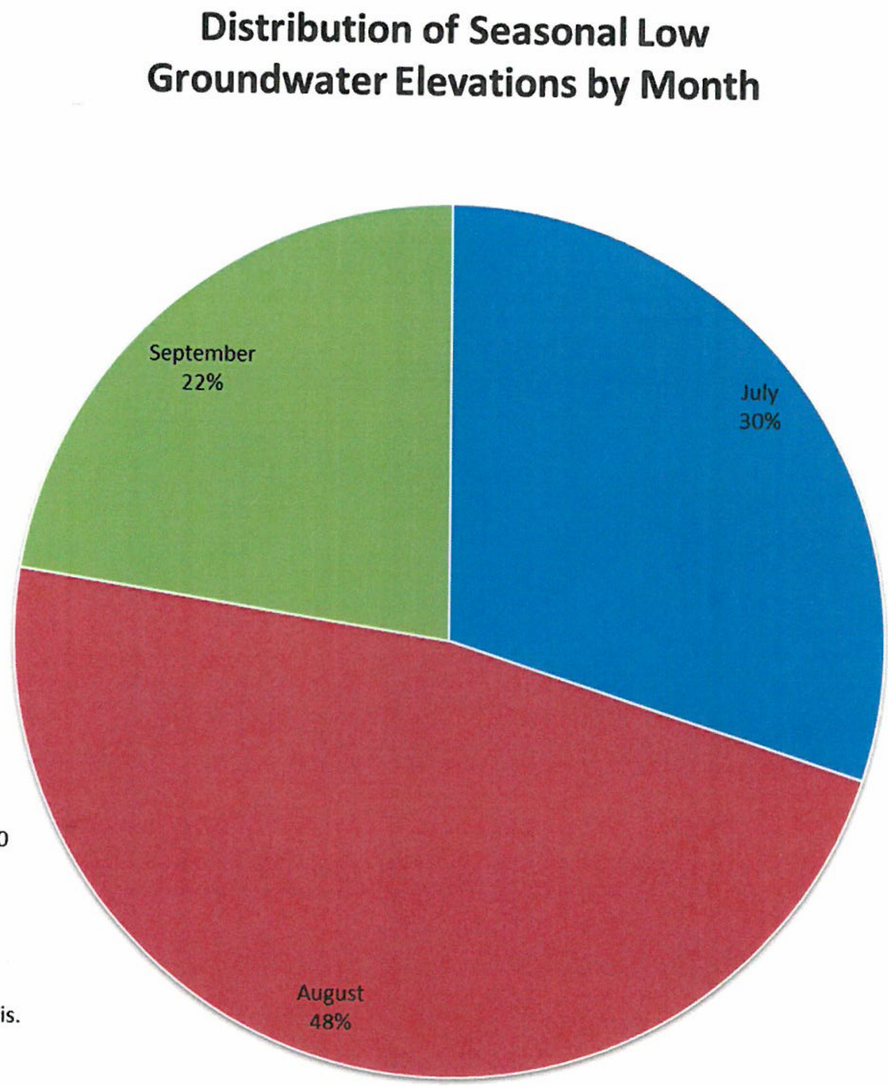


Figure 11 – Distribution of Seasonal Low Groundwater Elevations by Month



Notes

(1) Chart reflects data from the following subbasins of the Salinas Valley Groundwater Basin: 180/400 Foot Aquifer, East Side Aquifer, Forebay Aquifer, and Upper Valley Aquifer.

(2) Water Years 1985, 1991, and 2009-2014 were used in this analysis. These years represent near normal conditions (WY85), dry conditions (WY91), and the six most recent water years.

4.4 Field Methods

Groundwater elevation data collected from wells in the CASGEM network is intended to reflect static conditions. Best efforts will be made to ensure that wells have not recently been pumped prior to collecting a data point. Depth to water measurements will be made using one or more of the methods discussed in the following sections. Measurement methods described in the following sections are based on the Department of Water Resources document *Groundwater Elevation Monitoring Guidelines* (December 2010) with some alterations specific to wells in the monitored basins/subbasins described in this Monitoring Plan.

4.4.1 Graduated steel tape

Prior to measurement:

- Ensure that the reference point on the well can be clearly determined. Check notes in the field data collection notebook.
- Review the notes and comments for previous measurements in the field data collection notebook to determine if there are any unique circumstances at this well.
- Take note of whether oil has previously been present at this well; this will be recorded in the comments section of the data form.

Making a measurement:

- Use the previous depth to water measurement to estimate a length of tape that will be needed.
- Lower the tape into the well, feeling for a change in the weight of the tape, which typically indicates that either (a) the tape has reached the water surface or (b) the tape is sticking to the side of the well casing.
- Continue lowering the tape into the well until the next whole foot mark is at the reference point. This value on the tape should be recorded in the field data collection notebook.
- Bring the tape to the surface and record the number of the wetted interval to the nearest foot.
- If an oil layer is present, read the tape at the top of the oil mark to the nearest foot. Note in the comments section of the data form that oil was present.
- Repeat this procedure a second time and note any differences in measurement in the field data collection notebook.

4.4.2 Electric water level meter

This method of measurement employs a battery-powered water level meter and a small probe attached to a ruled length of cable. Depth to water measurements collected using this equipment are recorded to the nearest tenth of an inch. This instrument is sometimes referred to as a “sounder”.

Prior to measurement:

- Review the field data sheet for the well and note whether oil has been present at this well in the past. The electric water level meter should not be used in wells where oil is present.
- Ensure that the reference point on the well can be clearly determined. Check notes in the field data collection notebook.
- Confirm that the water level meter is functioning and is turned on so that the beeping indicator will operate properly.

Making a measurement:

- Review previous depth to water measurements for the well to estimate the length of tape that will be needed.
- Lower the electrode into the well until the indicator sounds, showing the probe is in contact with the water surface.
- Place the tape against the reference point and read the depth to water to the nearest 0.1 foot. Record this value on the field data sheet.
- Make a second measurement and note any differences in measurement in the field data collection notebook.

4.4.3 Sonic water level meter

This meter uses sound waves to measure the depth to water in a well. The meter must be adjusted to the air temperature outside the well; there is a card with reference temperatures in the case with the sonic meter.

Making a measurement:

- Insert the meter probe into the access port and push the power-on switch. Record the depth from the readout.
- Record the depth to water measurement in the field data collection notebook.

4.4.4 Pressure transducer

Automated water-level measurements are made with a pressure transducer attached to a data logger. Pressure transducers are lowered to a depth below the water level in the well and fastened to the well head at a reference point. Data points are logged on an hourly basis. MCWRA uses factory-calibrated, vented pressure transducers (Appendix D). MCWRA staff collects the pressure transducer data once per quarter. During the data collection process, data loggers are stopped, and the data is downloaded onto a laptop, and then the data logger is reactivated and scheduled to begin collecting data again on the next hour. Upon return from the field, data is processed and reviewed for errors.

4.5 Data Collection, Processing, and Reporting

Following completion of all fieldwork, data is transcribed from field data sheets and checked for errors before being loaded into MCWRA's Oracle platform database. All data will be stored in the MCWRA database before being uploaded to the CASGEM website. Submittal of data to the CASGEM website will occur at a minimum of twice per year, no later than January 1 and July 1, per DWR CASGEM program guidelines.

Bi-annual submittal of data to the CASGEM website will include the following for each well in the CASGEM network, as described in the DWR document *CASGEM Procedures for Monitoring Entity Reporting*:

- Well identification number
- Measurement date
- Reference point and land surface elevation, in feet, using NAVD88 vertical datum
- Depth to water, in feet
- Method of measuring water depth
- Measurement quality codes
- Measuring agency identification
- Comments about measurement, if applicable

The following information will also be submitted to the CASGEM online system, as it is required by DWR unless otherwise noted:

- Monitoring Entity name, address, telephone number, contact person name and email address, and any other relevant contact information
- Groundwater basins being monitored (both entire and partial basins)
- State Well Identification number (recommended)
- Decimal latitude/longitude coordinates of well (NAD83)
- Groundwater basin or subbasin
- Reference point elevation of the well, in feet, using NAVD88 vertical datum
- Elevation of land surface datum at the well, in fee, using NAVD88 vertical datum
- Use of well
- Well completion type (e.g. single well, nested well, or multi-completion well)
- Depth of screened interval(s) and total depth of well, in feet, if available
- Well Completion Report number (DWR Form 188), if available

Chapter 7

Appendix 7-B

MCWRA's Quality Assurance Project Plan (QAPP) for SWI Monitoring

Quality Assurance Project Plan (QAPP)
For
Water Quality Monitoring
Associated with the Salinas Valley Integrated Water Management Plan (SVIWMP)

EPA R9#03-238
X-97994701-0

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WATR0584QV4 (COPY 2)

1.0 PROJECT MANAGEMENT

1.1 TITLE AND APPROVAL PAGE

Quality Assurance Project Plan
For
Water Quality Monitoring Associated with
The Salinas Valley Integrated Water Management Plan (SVIWMP)
EPA R9#03-238
X-97994701-0

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1.2 TABLE OF CONTENTS

FIGURES

TABLES

APPENDICES

1.3 DISTRIBUTION LIST

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(831) 755-4516

1.4 PROJECT/TASK ORGANIZATION

The organization responsible for overseeing this ground water monitoring program is the Monterey County Water Resources Agency (Agency). This project is funded through a grant from the Environmental Protection Agency (EPA), under the authority of Section §104 (b)(3) of the Clean Water Act. This project falls under the Monitoring and Assessment funding category. The Monterey County Health Department's Consolidated Chemistry Laboratory is a California state certified laboratory that will perform the chemical analyses for this ground water monitoring program. The laboratory will use standard analytical methods.

The roles and responsibilities of those involved in the implementation of the ground water monitoring program are described below. An organizational chart for the program is shown below.

Project Manager is the responsible official who will oversee the preparation of grants and the fiscal management of the project.

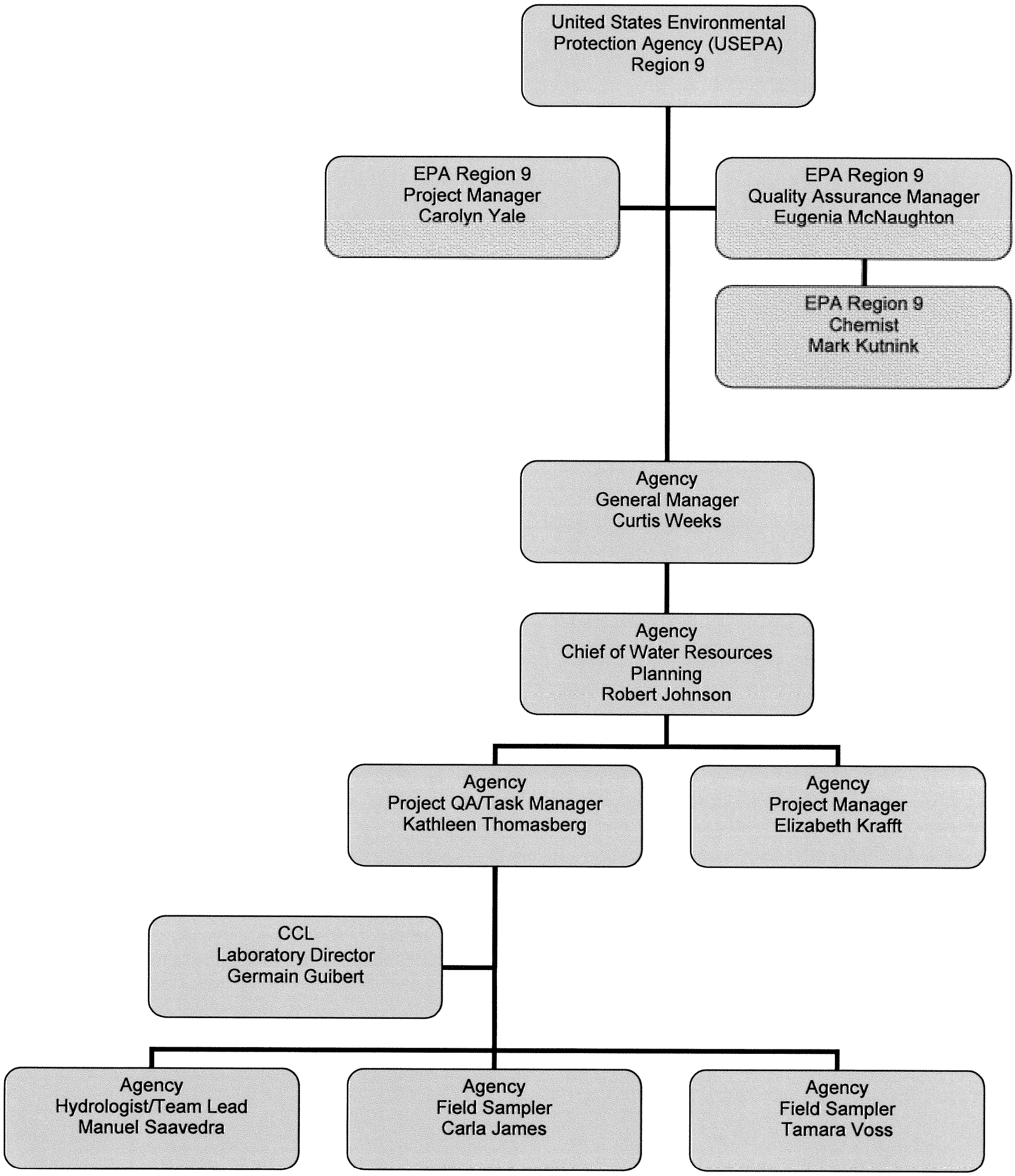
Project QA Manager is in charge of establishing the QA/QC protocols found in the QAPP as part of the sampling and analysis procedures. The QA Manager will also review and assess all analytical data from the contract laboratory and will be the liaison regarding data quality issues and concerns. She may stop all actions, including those conducted by the contract laboratory and will be responsible for ensuring that any amended versions of the QAPP are distributed to the organizations and individuals listed in Section 1.3.

Project Task Manager will oversee the ground water monitoring program. She will ensure that all QAPP protocols are followed and will oversee the writing and revisions of the QAPP. Since the Agency's Water Quality Department is not large, the Project Task Manager will function in the dual role of Task Manager and QA Manager.

Hydrologist/Team Lead will be responsible for coordinating with the Water Resources Technicians/ Field Samplers to review field and analytical requirements, documentation, and sampling schedules.

Water Resources Technicians/Field Samplers will be responsible for sample collection and communication with the contract laboratory regarding the sampling shipment schedule. They are also responsible for writing the QAPP.

ORGANIZATIONAL CHART



1.5 PROBLEM DEFINITION/BACKGROUND

1.5.1 Background

The Monterey County Water Resources Agency's (Agency) mission is to manage, protect, and enhance the quantity and quality of water for present and future generations of Monterey County (County). Monterey County, located along the California Central Coast, covers 3,322 square miles (8604 km^2) and has a resident population of 424,842 (Fact Finder, 2007). The County supports a \$3.4 billion agricultural industry (Ag Commission, 2006) and a \$1.75 billion tourism industry (EPA Grant R9#03-238). The primary land use within the Salinas Valley is agricultural. Since the 1940's, irrigated acreage within the valley has increased substantially. Coastal regions of California are subject to rapid urbanization, and the milder coastal climate supports year-round intensive cultivation of many high-value crops (Hunt et al, 2003). As agricultural and urban areas have expanded, so have the water needs of the County (EPA Grant R9#03-238).

The Agency uses a network of wells to monitor ground water conditions in the Salinas Valley Ground Water Basin (Basin) (Geomatrix, 2001). The Basin is situated entirely within the County (EPA Grant R9#03-238). The Salinas Valley is surrounded by the Gabilan and Diablo Ranges on the east, by the Sierra de Salinas and Santa Lucia Range on the west, and is drained by the Salinas River, which empties into Monterey Bay in the north (DWR 1946a) (Fig 1). Four subareas based on differences in local hydrogeology and recharge have been identified (White Paper, 1995; DWR, 2003). These are known as the Pressure, East Side, Forebay, and Upper Valley subareas (Fig 2). These subareas are hydrologically and hydraulically connected (EPA Grant R9#03-238); all information collected to date indicates there are no barriers to the horizontal flow (of ground water) between these subareas (White Paper, 1995). The "boundaries" between these subareas have been identified as zones of transition between different depositional environments in past millennia (White Paper, 1995).

The primary surface water features overlying and influencing the Basin's hydrology are the Salinas River and its tributaries, the Nacimiento and San Antonio reservoirs, and the Monterey Bay (EPA Grant R9#03-238). The Salinas River extends approximately 120 miles from the river's headwaters in San Luis Obispo County, near Santa Margarita, and flows north/northwest and discharges into the Monterey Bay National Marine Sanctuary near Moss Landing in Monterey County (EPA Grant R9#03-238). The Nacimiento and San Antonio reservoirs, located in the upper watershed, serve as storage and flood control for the Basin.

Ground water recharge in Salinas Valley is principally from infiltration from the Salinas River, Arroyo Seco Cone, and to a much lesser extent, from deep percolation of rainfall (White Paper, 1995). Deep percolation of applied irrigation water is the second largest component of the ground water budget, but because it represents recirculation of existing ground water rather than an inflow of "new" water, it is not considered a source of recharge (White Paper, 1995). Nitrate contamination of ground water poses a significant threat to the beneficial use of ground water for drinking water and for some agricultural water uses (White Paper, 1995). Nitrate concentrations exceed drinking water standards in some parts of the Basin (MCWRA, 1997). The principal source of nitrates to ground water is almost certainly excess fertilizer that is leached by rainfall and applied irrigation water (White Paper, 1995).

Seawater intrusion is another source of inflow to the Basin, but because it is not usable freshwater it is also excluded as a source of recharge (White Paper, 1995). Historically, ground water flowed from subareas to the south and east through the (Pressure) and seaward to discharge zones in the walls of the submarine canyon in Monterey Bay (Durbin et al 1978; Greene 1970). Within the Pressure subarea, due to the impermeable nature of the clay aquitard above the 180-Foot Aquifer, recharge from precipitation, agricultural return flows, or river flow is nil (DWR, 2003). Instead, recharge is from underflow originating in Upper Valley areas such as the Arroyo Seco Cone and Salinas River bed or the East Side subarea, and more recently, from seawater intrusion (DWR, 2003). Heavy pumping of the Pressure-180 Foot and Pressure-400 Foot aquifers has caused significant seawater intrusion into both of these aquifers, which was first documented in the1930's (DWR 1946a). Ground water flow in the northernmost area of the Pressure subarea has been directed from the Monterey Bay inland since this time (DWR, 2003). With increased pumping in the East Side subarea since the 1970's, ground water flow is dominantly northeast in the Pressure's central and southern locations (DWR, 2003).

Declining ground water levels in the Pressure and East Side subareas, Basin overdraft, ground water contamination, including nitrate and seawater intrusion are serious concerns for the Agency. (EPA Grant R9#03-238)

1.5.2 Program Objectives

The Agency is charged with management of the Basin's ground water resources. Much of the Agency's investigative work pertaining to the occurrence and use of ground water is to identify the quality, quantity, and temporal trends of ground water resources within the County. A network of monitoring wells provides the information needed to manage and protect ground water resources and sustain beneficial uses. In order for the Agency to develop projects to mitigate problems, such as seawater intrusion, local ground water overdraft, and high nitrate concentrations, the Agency must first implement an effective and accurate monitoring program to identify the extent of the potential problem.

The Ground Water Quality Monitoring Objectives are:
-continued monitoring of the ambient ground water quality, including general minerals
-continued monitoring of coastal aquifers (including Pressure Deep Aquifer) for detection of advancing seawater intrusion
-continued monitoring to determine distribution of conductivity in ground water
-continued monitoring to determine distribution of nitrate in ground water and identification of problem areas

Ambient ground water quality will be used to establish a cohesive and succinct Water Quality Management Plan in accordance to the work begun under EPA-I and continued under EPA-II. For the purposes of this QAPP, the EPA-I grant has funded the Agency to develop this QAPP. The EPA-II grant is funding the Agency to implement the sampling described in the QAPP.

1.5.3 Program Goals

The ground water monitoring objectives in the Salinas Valley will be met by the goal of sampling all 344 wells located throughout the four subareas within the Salinas Valley Ground Water Basin, during the 2007 summer field season.

The ground water monitoring objectives along the coast, specifically located within the Pressure subarea will be met by the goal of sampling all 85 monitoring wells, during the 2007 summer field season.

The Agency's overarching goal for this program is the continued monitoring of the Basin's ambient ground water for use in the management of this important resource, and *not* for the purpose of regulatory control.

1.6 PROJECT/TASK DESCRIPTION

1.6.1 Work Statement and Produced Products

The Salinas Valley Ground Water monitoring will sample 344 wells located throughout the Salinas Valley Ground Water Basin for ten constituents (Table 1). Each well will be sampled once. Samples will be collected during the 2007 summer agricultural growing season and analyzed for a complete mineral panel. The Coastal Ground Water monitoring will sample 85 wells located within the area of historic seawater intrusion. Each well in the Coastal Program will be sampled once a month during the agricultural growing season. The first month's sample will be analyzed for complete mineral panel and the two remaining sampling events will by analyzed for partial mineral panel (three constituents) (Table 1). All water monitoring samples will be delivered the same day as collected to the contract laboratory for analysis.

All ground water sampling locations are accessible using a 4-wheel drive vehicle. All samples will be collected as a grab sample. All sampling locations will be recorded using global positioning system (GPS) equipment, and digital pictures will be taken at each site.

After laboratory analysis and data validation is completed, a technical memorandum (EPA II, XP-96995301 Task 2 Water Quality Assessment) will be written and submitted to US EPA. The technical memorandum, EPA II, XP-96995301 Task 2 Water Quality Assessment, will include result tables for chloride, nitrate, and specific conductivity, and maps of chloride, nitrate, and specific conductivity gradient contours.

1.6.2 Constituents to be monitored and measurement techniques

Samples will be sent to an off-site laboratory for analysis. Ground water samples will be analyzed for either complete or partial mineral panels. A complete mineral panel includes calcium, cation-anion balance, chloride, conductivity, magnesium, nitrate, pH, potassium, sodium, sulfate, and total alkalinity. A partial mineral panel consists of chloride, conductivity, and nitrate.

Sample analysis will be preformed at the Monterey County Consolidated Chemistry Laboratory (CCL), which is part of the Environmental Health Department. Listed below is the laboratory's contact information and ELAP Certification number.

Laboratory Name	***Contact Information***	***Abbreviation***
Monterey County Consolidated Chemistry Laboratory ELAP Certification No 1395	1270 Natividad Road Salinas, CA 93906 Phone: 831-755-4516 Fax: 831-755-4652 http://www.co.monterey.ca.us/health	CCL

1.6.3 Project Schedule

The proposed project schedule is summarized below.

Prior to Sample Collection	
January 2006 - January 2007	: Develop project strategy
15 January, 2007	: Submit Draft QA Project Plan
22 March, 2007	: Receive review comments on QA Project Plan from US EPA
6 July, 2007	: Submit Draft Final QA Project Plan
13 July, 2007	: Obtain QA Project Plan approval (to begin fieldwork)
20 July, 2007	: Submit Final QA Project Plan (signatory copy) EPA R9#03-238; X-97994701-0
Sample Collection	
August 2007 - September 2007	: Coastal Ground Water (each well 3x, once per month)
August 2007 - September 2007	: Salinas Valley Ground Water (each well 1x)
Post Sample Collection	
November 2007	: Compile all remaining laboratory analyses reports
1 - 15 December, 2007	: Evaluate laboratory data for QA/QC requirements
15 December, 2007	: Copy of analytical results sent to well owner/operators
16 - 31 December, 2007	: Summarize and tabulate data
January 2008	: Write Technical Memorandum (EPA II, XP-96995301 Task 2 Water Quality Assessment)
March 2008	: Submit Technical Memorandum (EPA II, XP-96995301 Task 2 Water Quality Assessment) to US EPA

1.6.4 Geographical Setting

The Salinas Ground Water Basin encompasses approximately 537.5 square miles (1,392 km^2). The regional ground water flow is to the northwest. Seawater intrusion is a result of coastal pumping (Figure 3). Ground water pumping can dramatically impact localized coastal ground water flow.

1.6.5 Constraints

Ground water samples must be taken from the well while the pump is operating to ensure that the sample is representative of the aquifer and not standing water within the well casing. The Agency wants to measure the water quality when the aquifers are stressed due to pumping. For this reason the 2007 field sampling season will coincide with the agricultural irrigation season.

1.7 DATA QUALITY OBJECTIVES FOR MEASUREMENT DATA

This section describes the data objectives of the project and defines the measurement performance criteria deemed necessary to meet those objectives.

1.7.1 Objectives and Project Decisions

In Monterey County the Salinas Valley and Coastal Ground Water ambient monitoring programs are designed to characterize the ground water quality conditions of the Basin. All data generated from the sampling program in this project are tabulated as they have been over the many years of the program. Data generated from these monitoring activities allows the Agency to track changes in ground water quality over time and to assess potential impacts to ground water in the Basin. Water resource management and policy decisions may follow based on maps and tabulated data generated as a part of this project (program).

For the coastal ground water sampling program, the general mineral data are evaluated to determine if seawater intrusion is progressing landward as indicated by increasing well chloride values. The chloride values for all wells are evaluated, and then the 500mg/L chloride isochlor contours are mapped for the two coastal aquifers. When the maps are published, the information generated by MCWRA staff and approved by the MCWRA Board of Directors, is posted and passed on to Monterey County departments, regional government regulatory agencies, and public / private entities via the MCWRA web page, presentations, public meetings, and networking.

Monterey County departments such as the Planning Department and Health Department utilize the advancement of seawater as it relates to potable water and public health, while the agricultural community becomes aware of the proximity of their wells to the intrusion advancement, and the possible need for funds to drill new, deeper, wells and destroy the older high nitrate wells. Actions by regulators, depending on the entity, are related to prioritization of Regional Watershed and Water Quality Action Plans, and the associated success of MCWRA capital projects to halt seawater intrusion as governed by the State Water Resources Control Board adjudication process.

Actions by the MCWRA after the landward advancement of seawater have been ongoing for many years. Actions include consideration of more stringent Monterey County well drilling ordinances for assuring the continued prevention of cross-aquifer contamination in the coastal Salinas Valley, *"Zone 6 Drilling Standards", April 19, 1988;* the development and implementation of the Monterey County Recycling Projects, a tertiary treatment plant and treated water distribution system, to help further reduce agricultural pumping in the coastal Salinas Valley for halting seawater intrusion; and future use of these data will be utilized by the newly established Seaside Watermaster for comparison to and the development of the Monterey Peninsula seawater intrusion front.

For the Salinas Valley general mineral ground water sampling program, nitrate data tabulation and map representation has been the focus of the MCWRA for many years. All results over the laboratory's practical quantitative limit generated from this program are tabulated to evaluate the minimum, maximum, median, and mean value of nitrate as NO_3 in mg/L for each of the Salinas Valley Hydrogeologic Subareas.

For the Salinas Valley monitoring program, the Agency sends the general mineral testing results, including nitrate, to the well owners/growers who operate the wells sampled. Also, in this transmittal, the well operators are also provided with a conversion sheet of the nitrate concentration *from mg/L nitrate as NO_3 to pounds of nitrate per acre inch of water*, agricultural terms. If a nitrate value in ground source water is elevated, then that growers can incorporate this available nitrate into their fertilizer crop scheduling. This is a method for growers to reduce applied nitrate to crops, while maintaining maximum crop productivity.

And, as with the Coastal monitoring program, the tabulated and mapped Salinas Valley nitrate data are posted and passed on to Monterey County departments, regional government regulatory agencies, and public / private entities via the MCWRA web page.

The MCWRA uses the well nitrate data during the technical well application review process. Monterey County Health Department (Heatlh Department) issues well permits after the Agency provides a technical review of well applications for new, abandoned, or repaired wells. The well application proposal is evaluated with other well construction and water quality within a one miles radius of the new well and represented on a map. Agency staff makes qualitative recommendations to the Health Department on the new well's sanitary seal based on other well seals, the perforated intervals, and the nitrate values of wells in the area. The final decision for the well construction is made by the Health Department after the well drilling progresses.

Actions taken by the MCWRA are conditional. If extreme nitrate values are observed in agricultural production wells, then re-sampling of the wells may take place to confirm the elevated concentrations and may lead to increased sampling points for wells in the same vicinity and with the same well design. Continued increases in Salinas Valley ground water nitrate values could lead to special nitrate investigations on movement of nitrate in ground water and also outreach to the public on the reduction of nitrate to the environment.

1.7.2 Action Limits/Levels

Since the overarching goal for this project is the continued monitoring of ambient ground water, the Agency has set no specific water quality standards. As a result, the laboratory's practical quantitation limits (PQL) will serve as the Project Action Levels (PALs). Table 1 provides a listing of the parameter to be sampled and a summary of the laboratory's method detection limit, those minimum concentrations that can be detected above the instrumental background/baseline signal noise. Table 1 also provides the PQL, lowest calibration standard and PALs required by the Agency for the QAPP. The quality limits listed are deemed acceptable by the Agency to meet the project objectives.

1.7.3 Measurement Performance Criteria

The objective of data collection for this Monitoring Project is to produce data that represent the *in situ* conditions of the ground water. This objective will be achieved by using accepted standard methods for water collection and analysis and defining data quality indicators (DQIs) for each analytical parameter. The DQIs include accuracy, precision, comparability, sensitivity, completeness, and representativeness and are defined below and presented in Table 2. Some DQIs will be assessed quantitatively, while others will be qualitatively assessed. Example calculations have been provided for quantitative assessments and appropriate quality control (QC) samples have been identified. Laboratory Data Quality Objectives are given in Table 3.

Accuracy, or bias, is a measure of how close a result is to the expected value of the target analyte in a sample. Accuracy will be determined by the analysis of certified reference materials and matrix spikes, where the results can be compared with an expected value and expressed as %recovery. This is an assessment of laboratory analytical methods. For Laboratory Control Samples (LCS), it will be expressed as %recovery by the following equation:

$$\%Recovery = \frac{X}{T} \times 100$$

where,

X = Measured concentration
T = True spiked concentration

or, for Matrix Spike (MS) samples, by the following equation:

$$\%Recovery = \frac{(B - A)}{T} \times 100$$

where,

B = Measured concentration of spiked sample
A = Measured concentration of unspiked sample
T = True spiked concentration

The frequency of the LCS and MS samples associated with the analytical parameters will be 5%. MS and MSD samples will be spiked at 3-10 times the native sample concentration.

Accuracy/bias as related to contamination involves both field and laboratory components. Field blanks will be collected at a frequency of 5%. Laboratory blanks will be prepared and analyzed at a one per batch or 5% frequency.

Precision is concerned with the ability to quantitatively repeat results. To demonstrate the precision of a method or instrument, field duplicates will be collected, analyzed, and their results compared. Precision is expressed as relative percent difference (RPD) by the following equation:

$$RPD\ (\%) = \frac{|X_1 - X_2|}{(X_1 + X_2)/2} \times 100$$

where,

X_1 = Original sample concentration
X_2 = Duplicate sample concentration
$|X_1 - X_2|$ = Absolute value of $X_1 - X_2$

Field duplicates will be collected at a frequency of 10% for the first two sampling events. If the criterion of <25% RPD is met, then the remaining field duplicates will be collected at a 5% frequency. Laboratory duplicates will be prepared and analyzed at a one per batch or 5% frequency.

Comparability of the data can be defined as the similarity of data generated by different monitoring programs. Comparability helps to measure the scientific coherence and validity of a project. This objective is addressed primarily by using standard sampling and analytical procedures. Additionally, comparability of analytical data is addressed by result comparison of certified reference materials.

Sensitivity of the analytical instrument or method is the ability to detect and quantify an analytical parameter at the concentration level of interest. Sensitivity can be evaluated by method or instrument detection limit studies (MDL and IDL) or calculated practical quantitative limits (PQL) and method report limits (MRL).

Completeness is a measure of the amount of successfully collected and validated data relative to the amount of data planned to be collected for the project. Project completeness is typically based on the percentage of the data needed for the program or study to reach statistically valid conclusions. Because the SVIWMP is a monitoring program, data that are not successfully collected for a specific sample event or site can typically be recollected at a later sampling event. For this reason, most of the data planned for collection can not be considered statistically critical, and it is difficult to set a meaningful objective for data completeness. However, some reasonable objectives for the data are desirable, if only to measure the effectiveness of the Monitoring Program. %Completeness will be expressed by the following equation:

$$\%\text{Completeness} = \frac{N}{T} \times 100$$

where,

N = Number of usable results
T = Total number of samples planned to be collected

A completeness goal of 90% has been set for the ground water monitoring program.

Representativeness can be defined as the degree to which the environmental data generated by the monitoring program accurately and precisely represent actual environmental conditions. This objective is addressed by the overall design of the monitoring program. Specifically, assuring the representativeness of the data is addressed primarily by selecting appropriate locations, methods, times, and frequencies of sampling for each environmental parameter, and by maintaining the integrity of the sample after collection. Representativeness judges how well a single sample can describe the conditions of an entire sample population. Accurate, artifact-free sampling procedures and appropriate sample homogenization achieve representativeness.

1.8 TRAINING REQUIREMENTS/CERTIFICATION

1.8.1 Training of Field Personnel

A specialized training requirement for this project is for the use of Global Positioning Systems (GPS) Technology. Training in the use of handheld GPS units and software will be performed on an individual basis between the trainer and the trainee. Training will be provided by staff experienced in the use of GPS and Geographic Information Systems (GIS).

Field personnel will also be given initial instructions prior to the beginning of sample collection activities. These initial instructions will help familiarize the field personnel with sample collection containers, sample handling techniques, chain-of-custody forms, and sample transport. New field personnel will be accompanied by a trainer in the field as part of the initial instructions. All field samplers have completed a four-hour training session in the field. Training included confirmation of the well ID electrical meter tag number and MCWRA tag number, recognizing the appropriate sampling port, sample collection technique, proper handling of the sample during transportation to the lab, and accurate completion of the chain-of-custody forms. The completion of field training session has been documented in the Agency's personnel files.

All field personnel will follow sample collection procedures from accepted methods for the collection of ground water. Sample collection will follow protocols in accordance with recommended guidelines established by the U.S. Geological Survey (USGS) for ground water collection as described in the

National Field Manual for the Collection of Water-Quality Data, U.S. Geological Survey, Techniques of Water-Resources Investigations, Book 9, Chapters A1-A9. Field personnel will be familiar with the above-mentioned document.

Field personnel will also read and be familiar with this Quality Assurance Project Plan (QAPP) prior to beginning any sample collection activities.

1.8.2 Training of Laboratory Personnel

No specialized training of laboratory personnel is required for this project. The ground water constituents to be analyzed by the laboratory are routine and do not require additional expertise. In addition, the laboratory's QA plan notes that analysts 'must conduct sufficient preliminary tests using the methodology and typical samples to demonstrate competence in the use of the measurement procedure'.

1.8.3 GPS Training Documentation

Documentation of field personnel training for GPS includes: the name of the staff member being trained, the training date, the name of the trainer (instructor), and a checklist of satisfactory completion of each step. These training records are stored inside a monitoring binder and filed in the Agency's Water Quality Section. A sample GPS training record is attached in Appendix A.

Training documentation of laboratory personnel for routine methods is kept on file at the Consolidated Chemistry Laboratory (CCL). The CCL has written a policy regarding laboratory personnel training in their lab QA plan.

1.9 DOCUMENTATION AND RECORDS

1.9.1 QA Project Plan Distribution

The MCWRA Hydrologist/ Team Lead will safeguard the original QAPP and any subsequent revisions (both hard and electronic), plus keep a record of the distribution list in order to send out amendments to the QAPP and retrieve any obsolete versions (from the individuals listed earlier in section 1.3).

1.9.2 Field Documentation and Records

All field documentation generated by the sampling program will be kept on file in the Water Quality Section of the Agency. Field documentation includes field sheets, chain of custody (COC) forms, photographs, and labels (see Appendix B for examples of each).

1.9.2.1 Field Sheets

Field sheets are used to aid in the identification of each ground water source (well). The field sheets list the name of each well (as assigned by the well owner) and the State Well Number. The field sheets also contain a section that describes who the sampler should contact in order to have a well turned on, where to find the sample port, etc. The sampler is responsible for recording the sample date and time on the field sheet. Site observations should be written in the comments section of the field sheet, and initialed by the sampler. Site observations may include information such as detailed directions to the well location, changes to the electrical meter tag number, and the owner contact name and phone number. Field sheets also contain PG&E electrical meter numbers, which can be either verified or updated while the sampler is in the field.

Field sheets are double-checked by the sampler for completeness and accuracy while still in the field. The sampler should look for: incomplete and/or missing data/omissions, incorrect or invalid information, and clarity problems. Any discrepancies should be cleared up before the sampler leaves the field. Data that has been entered by one field sampler will be reviewed by a different field sampler to verify that no transcription errors have occurred. These data entry reviews will take place at least weekly.

Original field sheets are categorized (according to Coastal wells or Salinas Valley wells) inside binders which are kept in the Water Quality Section at the Agency for a period of 10 years. After such time, the copies are transferred to the Monterey County Record Retention Center and archived for a period of 5 years.

Data collected on field sheets will also be recorded electronically and stored in an Access database inside a shared network drive that is backed-up on a daily basis. These electronic records will be retained permanently.

1.9.2.2 Chain Of Custody (COC) Forms

Chain-of-custody (COC) forms will be provided by the Consolidated Chemistry Laboratory and filled out while the sampler is in the field. The COC will accompany the samples at all times in order to insure the custodial integrity of the samples. A sample is considered to be in custody if it is: in someone's physical possession, in someone's view, locked up, or secured in an area that is restricted to authorized personnel.

Care should be taken to protect the COC from physical damage (i.e., water, wind, etc). The COC will have the following information:

- Client Code
- Client Name
- Client Address
- Client Phone Number
- Client Fax Number
- Report Attention
- Sampler Name
- Collection Date
- Collection Time
- Sample Site (identified by state well identification number) or QC sample (if appropriate)
- Sample Type (all of the samples in this project will be **grab** samples)
- Matrix (all of the samples in this project will be **ground water** samples)
- Analyses Requested

Upon relinquishing the sample(s) to the Consolidated Chemistry Laboratory, the sampler will sign and date the COC form. Lab personnel will then receive the sample(s), mark the date and time received, assign unique lab identification numbers (lab IDs) to each sample, and sign the COC form. The signed COC form is then photocopied; the lab keeps the original, and a copy is given to the sampler.

Hard copies of COC forms are categorized (Coastal wells or Salinas Valley wells) inside binders which are kept in the Water Quality Section at the Agency for a period of 10 years. After such time, the copies are transferred to the Monterey County Record Retention Center and archived for a period of 5 years.

Electronic COC information is also stored in an Access database inside a shared network drive that is backed-up on a daily basis. These electronic records will be retained permanently.

1.9.2.3 Photographs

The Agency maintains a photo catalog which contains photographs of the Coastal well site locations. The photo catalog is carried into the field to assist with the identification of each well. If there are significant changes to the appearance of the well site, then staff will take a new digital photo. The old photo in the catalog will then be replaced with a copy of the new photo. Photographs will be taken of the Salinas Valley wells after confirming the correct well location of each.

Two photographs of each well location will be taken using a high resolution digital camera. One photograph will be from a distance of 100 ft. or more to aid in the identification of the correct site location. The second photograph will be a close up of the well and pump head, which will be used to verify location of the correct sampling port. Printed hard copies of these two photographs for each well will be kept in the photo log book and labeled with the state well identification number as listed on the field sheets.

Photographs will serve to help verify information entered into the field sheets. Photographs are stored in an electronic database and labeled according to site number and date last photographed. Previous photos will be archived electronically for retrieval purposes if the need arises.

1.9.2.4 Labels

Labels for each sample site are pre-printed on Avery (size 5163) sheets (10 labels per sheet). Indelible ink will be used on the labels and clear packing tape will be applied over the label to prevent it from coming off if it gets wet. Each label will have the following information:

- Sample Site (pre-printed)
- Collection Date (to be filled out in the field)
- Collection Time (to be filled out in the field)
- Analyses Requested (complete or partial mineral panel)
- Sampler Name (to be filled out in the field)
- Comments (if any)

The sample site name (state well identification number) will serve as the unique identifier for each sample (e.g. 14S/02E-08M02). When the samplers arrive at the CCL a unique in-house lab number is assigned to each sample.

1.9.2.5 Field Quality Control Sample Records

Quality Control samples from the field will be identified using the state well identification number plus either -1 or -2 (e.g. 14S/02E-08M02-1, for a field blank).

- -1 = Field Blank
- -2 = Field Duplicate

1.9.3 Laboratory Documentation and Records

The Consolidated Chemistry Laboratory will keep a sample receiving log containing the completed COC forms submitted with the samples collected for this project. The CCL will keep records of all analyses performed as well as associated QC information, including: laboratory blanks, laboratory duplicates, matrix spikes, matrix spike duplicates and laboratory control samples. Hard copy data of analytical results will be maintained for three years by the CCL. The CCL maintains a Laboratory Information Management System (LIMS) which will be used to store electronic data.

The data generated by the CCL for each sampling event will be compiled into individual data reports. The individual data reports will include the following information:

- Sample results and associated Quantitative Limits (QLs)
- Cation-Anion Balance Sheet
- QC check sample records and acceptance criteria for the following:
  - Laboratory Control Sample(s)
  - Matrix Spike(s)
  - Matrix Spike Duplicate(s)
  - Analytical Duplicate(s)
  - Method Blank(s)
- Project narrative including a discussion of problems or unusual events (including, but not limited to, topics such as: receipt of samples in incorrect, broken, or leaky containers, with improperly or incompletely filled out COC forms; receipt and/or analysis of samples after the holding times have expired; summary of QC results exceeding acceptance criteria; etc.)

The above information is logged into the LIMS database at CCL.

The Public Health Chemist of the Consolidated Chemistry Laboratory will be responsible for reviewing, validating, and/or qualifying results on the data reports. Any deviations from sample preparation, analysis, and/or QA/QC procedures will be documented. Departure from QC acceptance limits will be highlighted. Once the data reports are finalized, the hard copy will be sent to the Project QA Manager at the Agency.

At the end of the sampling season, all data for both programs (Coastal and Salinas Valley) will be electronically transferred to the Agency. After data verification, the Agency Hydrologist/ Team Lead will upload the data to the Agency's Water Resources Agency Information Management System (WRAIMS) relational database.

1.9.4 Technical Reviews and Evaluations

Technical reviews and evaluations are limited to Field Activities and Laboratory Data Review Checklists.

1.9.4.1 Field Activities Review Checklist

Field personnel will be required to fill out a Field Activities Review Checklist as part of the double-check process upon returning from the field after each sampling event (see Appendix C).

1.9.4.2 Laboratory Data Review Checklist

Laboratory data reports from the CCL will be routed to the Project QA Manager at the Agency, who will do a preliminary assessment of the data. The data reports will then be given to the Agency

Hydrologist/ Team Lead who will be responsible for completing a Laboratory Data Review Checklist (see Appendix C).

1.9.5 Technical Memorandum

The Agency Project QA Manager is responsible for the preparation of the technical memorandum. The technical memorandum will be written in the "post sample collection" phase (see section 1.6.3). The technical memorandum will be submitted to USEPA for review by the EPA Region 9 Project Manager.

The technical memorandum will contain the following elements:

- Table of results for Chloride
- Table of results for Nitrate
- Table of results for Specific Conductance
- Map of Chloride contours for 500 mg/L values
- Map of Nitrates showing those sites which have values above and below the Drinking Water Standard Limit of 45 mg/L (nitrate as NO3)
- Map of Conductivity contours

2.0 DATA GENERATION AND ACQUISITION

2.1 SAMPLING DESIGN

In the Salinas Valley, there are four hydrogeologic subareas: Pressure, East Side, Forebay, and Upper Valley. All four subareas were selected using a directed sampling design approach. These subareas were selected deliberately based on knowledge from previous monitoring work to contain analytes of interest, specifically nitrate and conductivity in the Salinas Valley Program, and chloride and conductivity in the Coastal Program. Actual sampling sites/wells within the Salinas Valley Basin Monitoring Program were chosen using a non-deliberate sampling approach. The wells included are acquired opportunistically. Site accessibility is a key issue for sampling. Permission of property owners must be secured before accessing private wells.

There are just over 1700 active wells in the Salinas Valley. Of this total number of wells, 344 wells make up the Salinas Valley Ground Water program and 85 wells make up the Coastal Ground Water program. The wells that make up these two programs have all been sampled in the past; some have data sets as far back as the 1950's, when this was a State of CA Department of Public Works (now the Department of Water Resources) program. The Agency wants to keep as complete and continuous a data set for each of these wells as possible.

Due to the time constraints the Agency is facing during this shortened 2007 field season, June - September, staff will prioritize which wells within the Salinas Valley portion of this project will be sampled. Wells to be sampled first will be located within approximately one mile radius of municipalities and industries (such as vegetable packing plants). We refer to these areas as high beneficial use areas. Ground water wells will be identified by State Well Numbers (Township, Range, Section, and Subsection).

All wells are high production agricultural wells. All wells are sampled in the same way, if the pump is in operation then a sample will be collected. If the pump if not operating then the field sampler will note it on the field sheets and come back to the well at a later date when the well is in operation. The pump must be operating for a sample to be collected. The age of well does not alter sampling protocols. If a well is found to have been abandoned since the Agency last sampled the well, a notation will be made on the field sheets and the well will be removed from future sampling efforts.

2.1.1 Salinas Valley Ground Water

While it is known that high levels of nitrates exist in some aquifers of the Salinas Valley Ground Water Basin, a significant sampling effort to determine the extent in the ground water has not been conducted by the Agency for several years. There are a total of 344 sample locations within the Salinas Valley monitoring program. Sample locations are operational ground water wells, the majority of which are used for agricultural irrigation. The Pressure subarea has 158 wells, the East Side subarea has 66 wells, the Forebay has 84 wells, and the Upper Valley has 35 wells (Figures 4-7). Each of these wells will be sampled once during the 2007 summer field season (July-September). The primary criterion currently used to determine if a well will be included in the Salinas Valley monitoring program has been its status as previously sampled. This program is an ongoing ambient ground water monitoring program and continuity in sampling the same wells each field year is of prime importance, especially for water quality trend analysis. Other factors that are important in deciding if a well should be included in the monitoring program are; copy of the well completion report (commonly referred to as the driller's log), location of the perforation interval along the well casing to determine which aquifer is sampled, age of the well, and construction method used to drill the well. Additionally it is useful to know the proximity of the well to other water use (industrial, municipal, or domestic) areas. A list of Salinas Valley well names and locations are given in Table 4. All wells on this program are planned to be part of the monitoring design for subsequent years. Until these monitoring wells are abandoned or destroyed, they will remain part of this program.

2.1.2 Coastal Ground Water

The Agency currently conducts a seawater intrusion monitoring and mapping program (EPA II). This program will continue to evaluate the extent and status of seawater intrusion in the coastal areas of the Salinas Valley Basin (EPA II). The Coastal portion of the ground water program contains 85 wells, most of which are located in the Pressure subarea (Figure 8). Each well will be sampled three times, once each month of the summer 2007 field season (July-September). The first sample collection at each well will be analyzed for a complete mineral panel (Table 1), and following two collections will be analyzed for a partial mineral panel (Table 1). There are 21 wells located in the Pressure 180-Foot Aquifer, 52 wells within the Pressure 400-Foot Aquifer, two wells with perforations within both the Pressure180-Foot and 400-Foot Aquifers, four wells are located within the Pressure Deep Zone Aquifer, three in the East Side Deep Aquifer, one in the East Side Shallow Aquifer, and one in the Prunedale Aquifer. The principal criterion for inclusion in the Coastal monitoring program is historical sampling and well availability. Additional criteria for selecting a well for inclusion into the Coastal monitoring program are: a well completion report, location of the perforation interval along the well casing to determine which aquifer is sampled (180, 400, or deep zone AQ), well age, and well construction type. A list of Coastal sites and their representative aquifers are listed in Table 5.

It can not be stressed enough how important the continued monitoring of these ground water wells are for the Agency to meet its mission of monitoring the quality of the County's ground water resources. Some of these well have been sampled since the 1950's and the loss of such a long term water quality record within the County of Monterey would irreplaceable.

2.2 SAMPLING METHODS

The objectives of the sampling procedure are to minimize changes in ground water chemistry during sample collection and transport to the laboratory, and to maximize the probability of obtaining a representative, reproducible ground water sample. This well-volume purging procedure provides a reproducible sampling technique with the goal that the samples obtained will represent water quality over the entire screen interval of the well.

Standing water in the well casing can be of a different chemical composition than that contained in the aquifer to be sampled. Solutes may be adsorbed on to, or desorbed from the well casing material, oxidation may occur, and biological activity is possible. Therefore, the stagnant water within the well must be purged so that the sample is representative of the aquifer. As a result, a well may be sampled only after the pump has been in operation for at least 15-20 minutes.

All the wells included in this project, from both the Salinas Valley area and the Coastal monitoring area are high production agricultural wells that contain deep turbine pumps operating at 500-1200 gallons per minute (gpm). Over the years of managing the ambient monitoring program, the Agency has determined that operating a deep turbine pump for 15-20 minutes before taking a sample is sufficient time to clear the entire well casing of three well volumes for ensuring a representative well sample. For referencing well casing volume, the Agency uses the well casing size provided in the well completion reports (driller's log) for each of the wells included in this monitoring program (National Field Manual for the Collection of Water-Quality Data, Chapter A2).

Sample bottles and caps are rinsed three times with ambient ground water prior to collection. The sample container is then filled, tightly capped, and labeled. No field sample filtration is required. Samples are put into a cooler with ice immediately and maintained at 4°C and delivered to the laboratory daily. See Table 6 for sample collection requirements. Extra sample containers, caps and field supplies will be carried in the truck as back-up should any problem arise in the field. Additionally, the Field Sampler will carry and maintain an updated hardcopy of the QAPP in the field to be used as a reference.

The following precautions will be followed in order to limit sampling error at the wellhead:

- Operate the pump long enough to produce water that is representative of the aquifer and not stagnant water from the casing.
- Take samples at the wellhead or near the wellhead and away from fertilizer injection ports.

Sample collection will follow protocols in accordance with recommended guidelines established by the U. S. Geological Survey (USGS) for ground water collection as described in the <u>National Field Manual for the Collection of Water-Quality Data.</u>

<u>The National Field Manual for the Collection of Water-Quality Data, U.S. Geological Survey, Techniques of Water-Resources Investigations, Book 9, Chapters A1-A9</u> is maintained as a web-based document and is located at http://pubs.water.usgs.gov/twri9A. Updates and revisions for the National Field Manual can be found using this web-based approach.

2.3 SAMPLE HANDLING AND CUSTODY

This section describes how all samples will be treated after collection, during transport, and upon arrival at the CCL. It also includes information on proper sample disposal after laboratory analysis.

2.3.1 Sample Containers and Preservatives

Sample containers to be used in this project are high density polyethylene (HDPE), one pint (~0.5 L) and 0.5 gallon (~2 liter) sizes, for partial mineral or complete mineral analyses, respectively. The Agency has used these same sample container types during previous years of this ongoing ambient monitoring program and has never had any problems with container contamination issues. Field blanks will be closely monitored and, should a problem arise, corrective actions will be taken. Only one container (pint *or* half gallon) is needed per sampling site to provide the necessary volume to run the required lab analyses (see Table 6). Sample containers and caps are purchased in bulk from a plastic container manufacturer (Consolidated Container Company). The caps for the containers are packaged separately. The containers and caps are clean upon receipt, as long as they arrive with the outer cardboard packaging intact. The containers will be kept in a closed, dry environment away from the outside elements. Sterility is not of importance because this sampling project does not include microbiological testing. As previously mentioned, all containers and caps will be rinsed three times with ambient sample water prior to sample collection.

Sample containers are labeled with pre-printed labels, which lists which panel of analytes is requested, either complete mineral or partial mineral. The collection date, collection time, and sampler name are recorded in the field with an indelible marker. After being filled out, labels will be covered with clear plastic tape (packaging type) to protect the labels from destruction during transport.

No chemical *field preservation* of the samples is required. All samples will be kept at 4±2°C.

Preservation of samples, if required prior to analysis, will be the responsibility of the contract lab (CCL). Part of the CC lab sample receiving protocols includes lab personnel verifying, at the time of sample receipt, if any samples require lab preservation. Refer to Table 6 for listings of preservatives for specific analytes.

2.3.2 Sample Packaging and Transport

All samples will be handled, prepared, transported and stored in a manner so as to minimize contamination and spills. After collection, sample caps will be checked for tightness, and the samples will be put in ice chests immediately. During travel between sites, ice chest lids will be kept tightly closed in order to keep the samples at the correct temperature and protect them from sunlight. Ice used for maintaining sample temperature will be double-bagged inside durable plastic bags (Ziploc type) and be of sufficient quantity so that all samples will stored at 4±2°C. Maximum holding times for specific analytes are listed in Table 6.

2.3.3 Sample Custody

Chain of custody (COC) procedures require that possession of samples be traceable from the time the samples are collected until completion and submittal of the analytical results. A completed chain of custody form is to accompany the samples to the contract laboratory (CCL). Requirements for COC paperwork can be found in Section 1.9.2.2 of this document.

All samples collected for this project will be transported from the field to the CCL via an Agency vehicle. The field sampler will deliver the samples directly to the CCL daily; there will be no intermediary transfers. Samples need to arrive at the CCL no later than 15:00, to ensure log-in and laboratory preservation. Personnel at the CCL will examine the samples for correct documentation and holding times. The CCL will follow sample custody procedures as outlined in their QA plan (see Appendix D).

2.3.4 Sample Disposal

All samples remaining after successful completion of analyses will be disposed of properly. It is the responsibility of the personnel at the CCL to ensure that all applicable regulations are followed in the disposal of samples or related chemicals. Sample disposal procedures used by the CCL are discussed in their QA plan (see Appendix D).

2.4 ANALYTICAL METHODS

All samples will be analyzed at the County Consolidated Chemistry Laboratory (CCL). Analyses will be performed following either EPA approved methods or methods from *Standard Method for the Examination of Water and Wastewater, 18th Edition,* see Table 1 (CCL's QA Manual cites *18th Edition,* see Appendix D). Standard operating procedures (SOPs) from CCL have been included in Appendix D for each of the analyses. Should there be any deviation from these SOPs the Laboratory Director must contact the Project QA Manager.

The CCL will submit a data report and associated QC results after analyses are complete to the Project QA Manager. This data report is described in Section 1.9.3. After a preliminary assessment the Project QA Manager will pass the data on to the Team Lead, who will review the data report and QC results and evaluate its quality and usability in addressing the Project objectives.

2.5 QUALITY CONTROL

2.5.1 Field Sampling Quality Control

The assessment of field measurements will be determined from the collection and analysis of field blanks and field duplicates. For this monitoring program the field blanks will be collected at one every 20 samples or a frequency of 5%. Field duplicates will be collected at a frequency of 10% for the first two sampling events. If the criterion of <25% RPD is met, then the remaining field duplicates will be collected at a 5% frequency. Analytical acceptance criteria and corrective actions for field QC are listed in Table 2.

Deionized (DI) water will be acquired from the CCL and kept at 4±2°C, while transported into the field. Field blank samples will be obtained by pouring DI water into a pint (~500 mL) HDPE sample container that has been triple-rinsed with DI water at the sampling location. The container will be tightly capped, placed in the cooler and delivered to the contract laboratory. Field blanks are labeled with the sampling location (State Well Number) followed by "-1".

Field blanks will be used to evaluate the collection process (from field sampling through sample analysis) for contamination from exposure to ambient conditions, from sample containers or from improper sampling and handling technique. If target analytes are found in field blanks, sampling and handling procedures will be reevaluated and corrective actions taken. Corrective actions may consist of, but are not limited to, re-training of field personnel, discussions with the contract laboratory, invalidation or qualifying of results.

Field duplicates will be collected for every analytical parameter. The duplicate sample will be collected immediately after collection of the native, following the same sampling protocols. Field duplicates are labeled with the sampling location (State Well Number) followed by "-2".

Field duplicates will be used to evaluate the precision of the sample collection through analysis. The combined variability from sampling and analysis technique, in addition to sample heterogeneity, will be assessed using field duplicates. If acceptance criteria are exceeded, field sampling and handling protocols will be reviewed and problems corrected. These may consist of, but are not limited to, additional training, revised sampling techniques and reevaluation of sampling location.

2.5.2 Laboratory Analyses Quality Control (Contract Laboratory)

The Monterey County Consolidated Chemistry Laboratory's (CCL) personnel are responsible for analytical Quality Control. Standard laboratory quality control elements include method blanks, laboratory control samples, analytical duplicates, matrix spikes and calibration procedures. Laboratory data quality objectives include QC acceptance criteria, frequency of analysis, and corrective actions. These data quality objectives and quality control elements for CCL are described in its QA Manual (Appendix D) and SOPs (Appendix D) and are listed in Table 3. After examination of these documents, the Agency believes that the laboratory will be able to meet the project data quality needs. Any deviation from these written procedures must be documented by the laboratory and reported to the Project QA Manager.

2.6 INSTRUMENT/EQUIPMENT TESTING, INSPECTION, AND MAINTENANCE REQUIREMENTS

Testing, inspection, and maintenance of laboratory equipment are the responsibility of the Monterey County Consolidated Chemistry Laboratory and are detailed in its QA manual in Appendix D.

2.7 INSTRUMENT CALIBRATION AND FREQUENCY

Instrument calibrations are the responsibility of the Monterey County Consolidated Chemistry Laboratory and acceptance criteria for calibrations are detailed in its QA manual in Appendix D.

2.8 INSPECTION/ACCEPTANCE REQUIREMENTS FOR SUPPLIES

2.8.1 Initial Inspection of Supplies

As mentioned previously in Section 2.3.1, sample containers are purchased in bulk from an outside vendor who specializes in supplying plastics to the beverage industry. An initial inspection will be conducted upon receipt of each shipment. Each shipment will be considered acceptable for use if *all* of the following are true:

- The shipment arrives with the outer cardboard packaging intact.
- The containers are the correct type (HDPE) and size (0.5 gal/~2L *or* 1 pint/~0.5L).
- The insides of the containers are dry.
- The insides of the containers are free of dirt or any particulate matter.

2.8.2 Field Inspection of Supplies

Immediately prior to sample collection, field samplers will visually inspect each sample container for the following:

- Dirt or any particulate matter
- Cracks of any size
- Improper fit of the cap on the container

If the field sampler observes any of the above, then the container will be discarded and an acceptable container will be used instead.

2.8.3 Laboratory Inspection of Supplies

CCL will be responsible for establishing inspection and acceptance criteria for supplies that adhere to their internal QA/QC policies.

2.9 DATA ACQUISITION REQUIREMENTS (NON-DIRECT MEASUREMENTS)

Non-direct measurement data will not be used during this monitoring program. Should at some time in the future the Agency decide to use data from an external source, QA/QC requirements will be established. Should this occur, an addendum to this QAPP will be submitted to USEPA.

2.10 DATA MANAGEMENT

Data, as related to documentation and records, will be managed as outlined earlier in Section 1.9 of this QAPP.

In addition, the CCL will group QA/QC data under a separate client code so that QA/QC data can be filtered from regular sample data before being uploaded into the Agency's Data Management System (WRAIMS). This allows the Agency a greater flexibility both in quickly and easily accessing the data that included QA/QC samples for initial review, and increased flexibility in uploading and moving large data sets.

3.0 ASSESSMENT AND RESPONSE ACTIONS

This section lists review procedures that will be taken to ensure all the protocols outlined in the QAPP are consistently followed.

3.1 REVIEWS

3.1.1 Readiness Reviews

Water Resources Technicians/ Field Samplers will be trained by the Hydrologist/Team Lead before any field sampling begins. Training will cover proper sample collection and handling and the completion of all paperwork (COCs, field logbooks, etc). The Team Lead will ensure that Field Samplers have properly prepared all collection containers, paperwork and other supplies needed to complete a successful sampling event. Any problems discovered during the readiness review will be corrected before the Samplers begin work.

3.1.2 Field Reviews

The Team Lead will be responsible for overseeing that all field activities are incompliance with Agency protocols. The Team Lead will be available via phone should any questions arise while the Samplers are in the field. The Team Lead will also review all field paperwork such as COCs and field logbooks for completion. Additionally the field QC samples (field blanks and duplicates) will be used to evaluate the individual Sampler's technique. If problems are exposed they will be corrected straight away so that all further samples are valid. A stop-work order may be issued by the Project QA Manager at any time if a discrepancy or error is found that could negatively affect the data being collected.

3.1.3 Post Sampling Reviews

Post sampling reviews will be conducted following each sampling event in order to ensure all information is complete. Reviews will be conducted by the Field Sampler due to the small size of the staff. They will include evaluation of sampling activities and field documentation and will take place in the office, not in the field. Findings will be passed on to the Team Lead and the Project QA Manager to be incorporated into the next field event.

3.1.4 Laboratory Data Reviews

The Team Lead will be responsible for reviewing the laboratory's data for completeness and accuracy. The data will also be checked to determine that all specified methods were used and all related QC data was provided with the sample analytical results. These reviews will take place immediately upon receipt of data reports from the laboratory. This will ensure that any method deviations are corrected or explained, and any missing or incomplete data are provided. The Project QA Manager has the authority to request re-testing of laboratory data if it is invalid or would otherwise compromise the quality of the resulting project conclusions.

3.2 REPORTS

The Project QA Manager will be responsible for the technical memorandum (EPA R9# 03-238 Task 3.3) which will be provided in March 2008 to US EPA. The technical memorandum (EPA R9# 03-238 Task 3.3) will include result tables for chloride, nitrate, and specific conductivity, and maps of chloride, nitrate, and specific conductivity gradients. The technical memorandum will include a summary of any significant QA/QC issues and how they were resolved. It is currently understood that this project is of short enough duration that only a final technical memorandum to the EPA is necessary.

4.0 DATA VALIDATION AND USABILITY

4.1 DATA VERIFICATION AND VALIDATION

Data review is the in-house examination to ensure that the data have been recorded, transmitted, and processed correctly. The Team Lead is responsible for the data review. This examination will check for data entry errors, calculation errors, and data omission errors. If possible these errors will be corrected.

4.1.1 Field Data

Field data include logbooks, photographs, and COCs. The Field Sampler is responsible for reviewing the field data at the end of the sampling event. This includes determining that all information is complete and any deviations from the sampling methodologies are documented using the Field Activities Review Checklist (Appendix C).

4.1.2 Laboratory Data

Initial evaluation of the laboratory data are carried out by the CCL in agreement with protocols listed in their SOPs and QA manual. The Team Lead will also conduct an independent review of the data and QC parameters as described in sections 3.1.4 and using the Laboratory Data Review Checklist as detailed in section 1.9.4.4 and Appendix C.

4.2 RECONCILIATION WITH USER REQUIREMENTS

The purpose of the continued ambient monitoring of the Salinas Valley Basin Ground Water is to assess the water quality to manage and protect ground water resources. For data to be useful in developing the overreaching Salinas Valley Integrated Water Management Plan, it must first meet the requirement of this QA project Plan. The Project QA Manager will be responsible for making the final evaluation of the data's usability in meeting the Project objectives. All data passing this final evaluation will then be used to establish a cohesive and succinct Water Quality Management Plan in accordance to the work begun under EPA-I and continued under EPA-II. Additionally, the Agency will integrate these ground water quality data with previously collected data for use in trend analysis.

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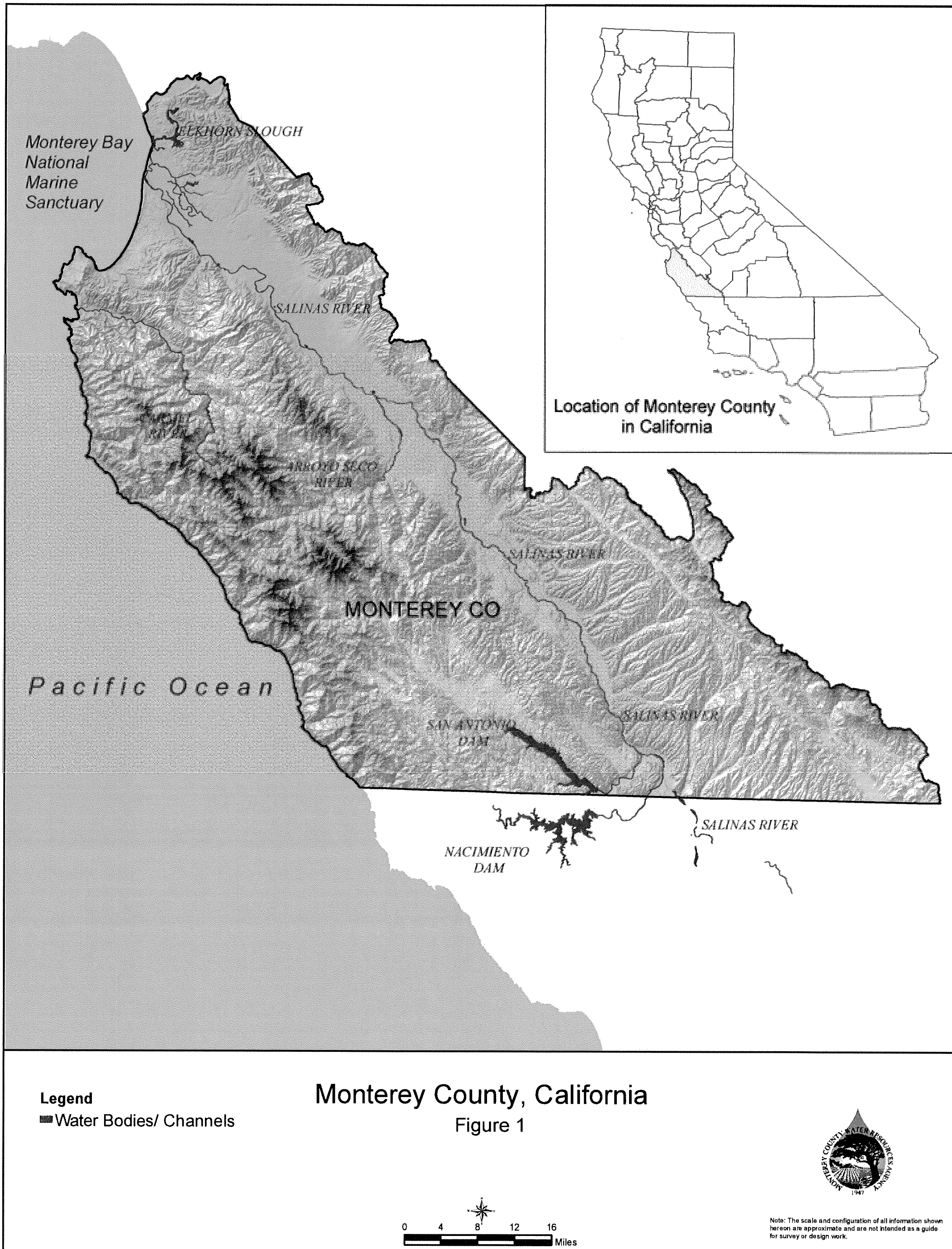
FIGURES

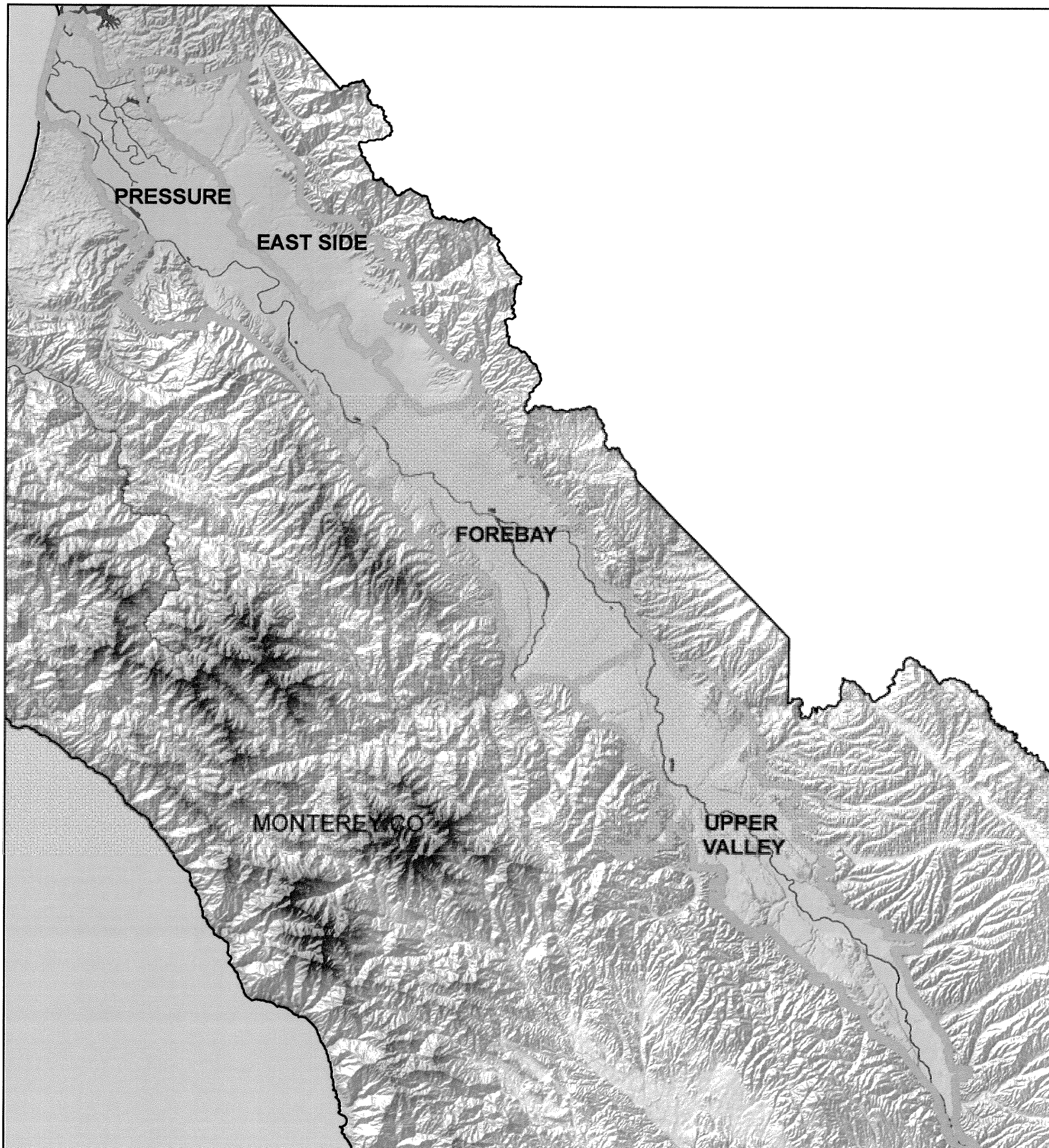


Monterey County, California

Figure 1

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work.

Map Date: July 5, 2007



Legend

Water Bodies/ Channels

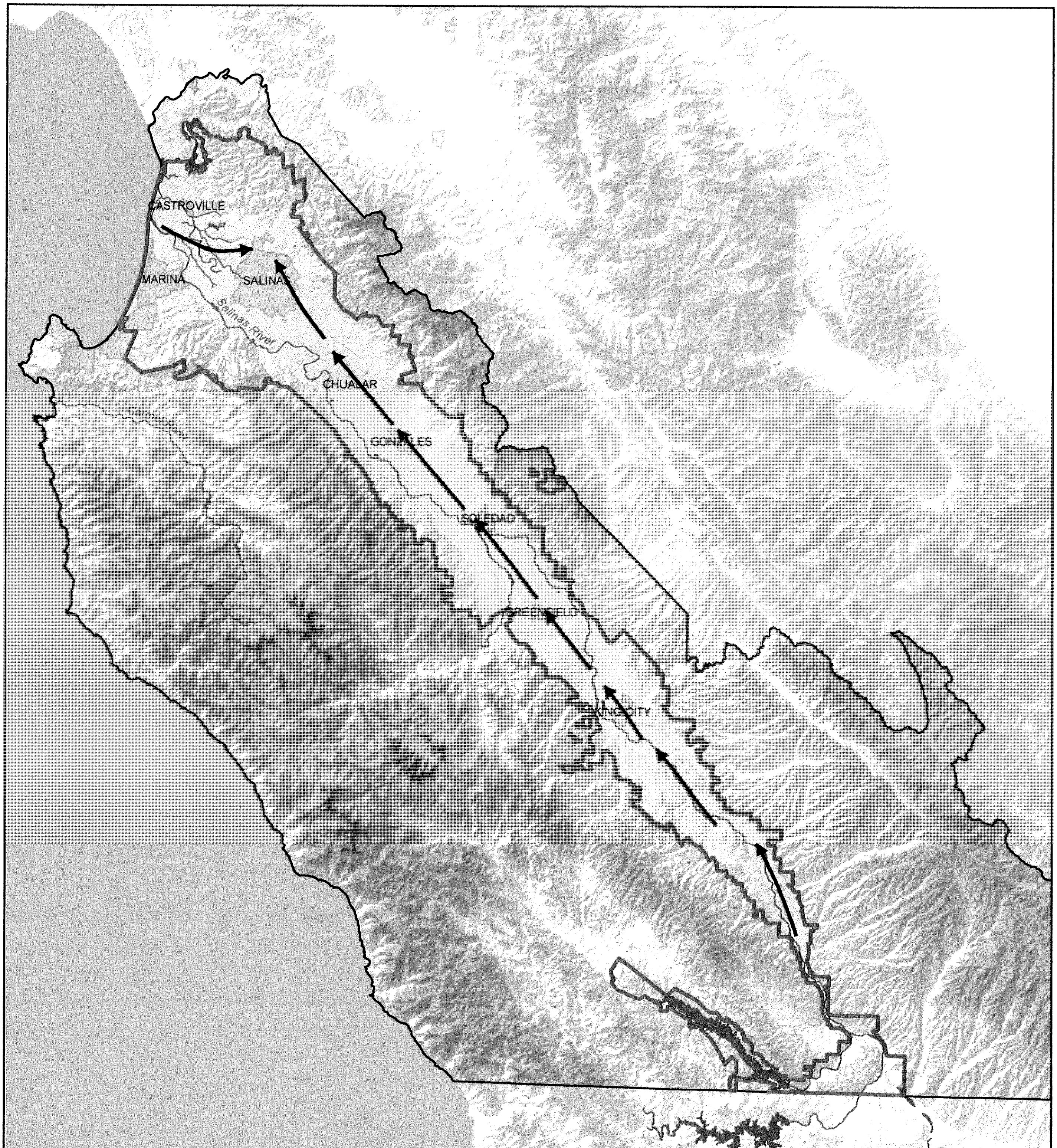
Salinas Valley Aquifers

Figure 2

0 2 4 6 8 Miles

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work.

Map Date: July 5, 2007



Ground Water Flow Direction in the Salinas Valley

Figure 3

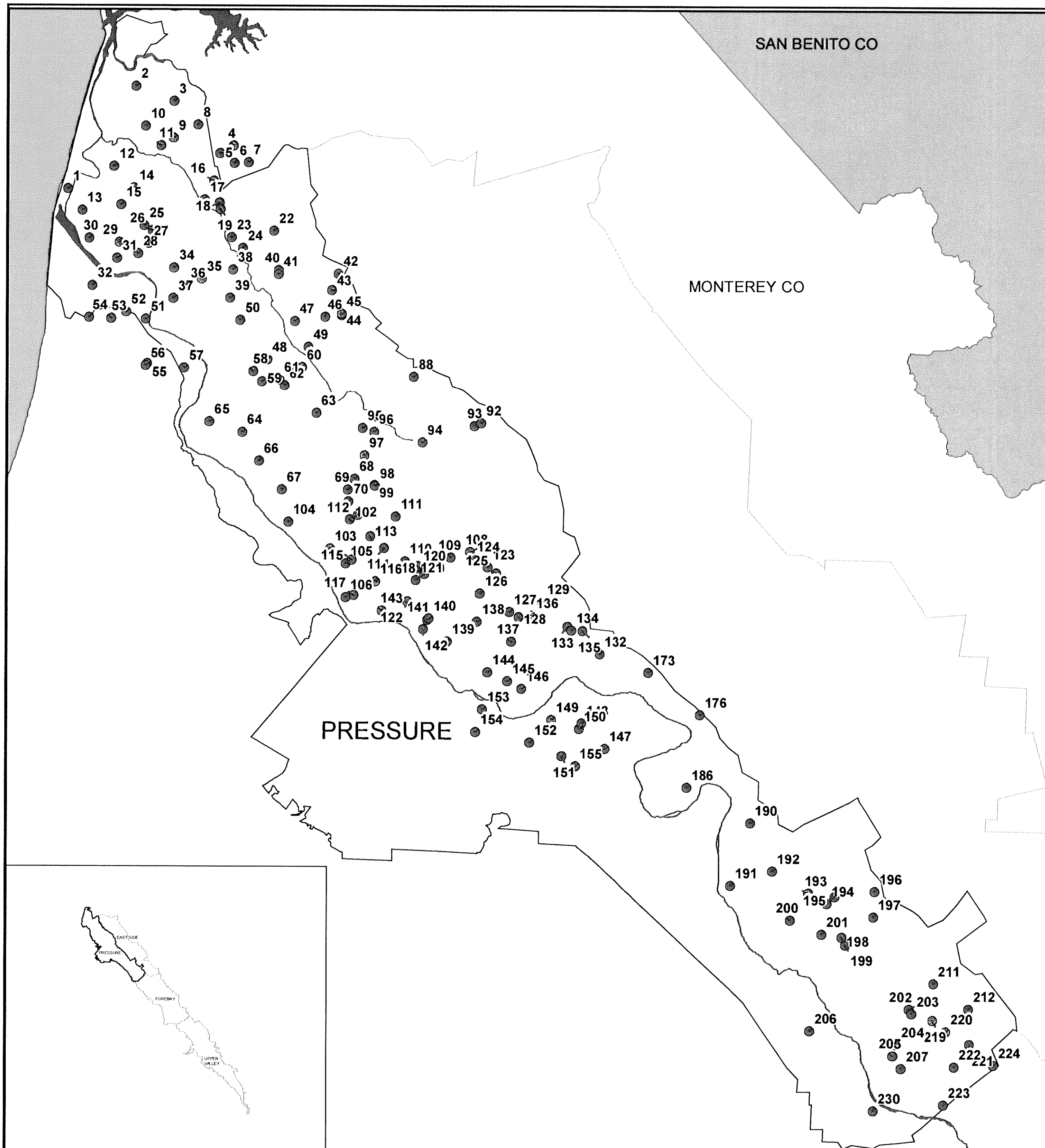
Legend

- Ground Water Flow Direction
- Assessment Zone 2C
- Monterey County
- Rivers and Other Bodies of Water

0 10 20 Miles

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work.

Map Date: July 6, 2007



Salinas Valley Wells in the Pressure Subarea

Figure 4

Legend:

- Study Well
- Rivers

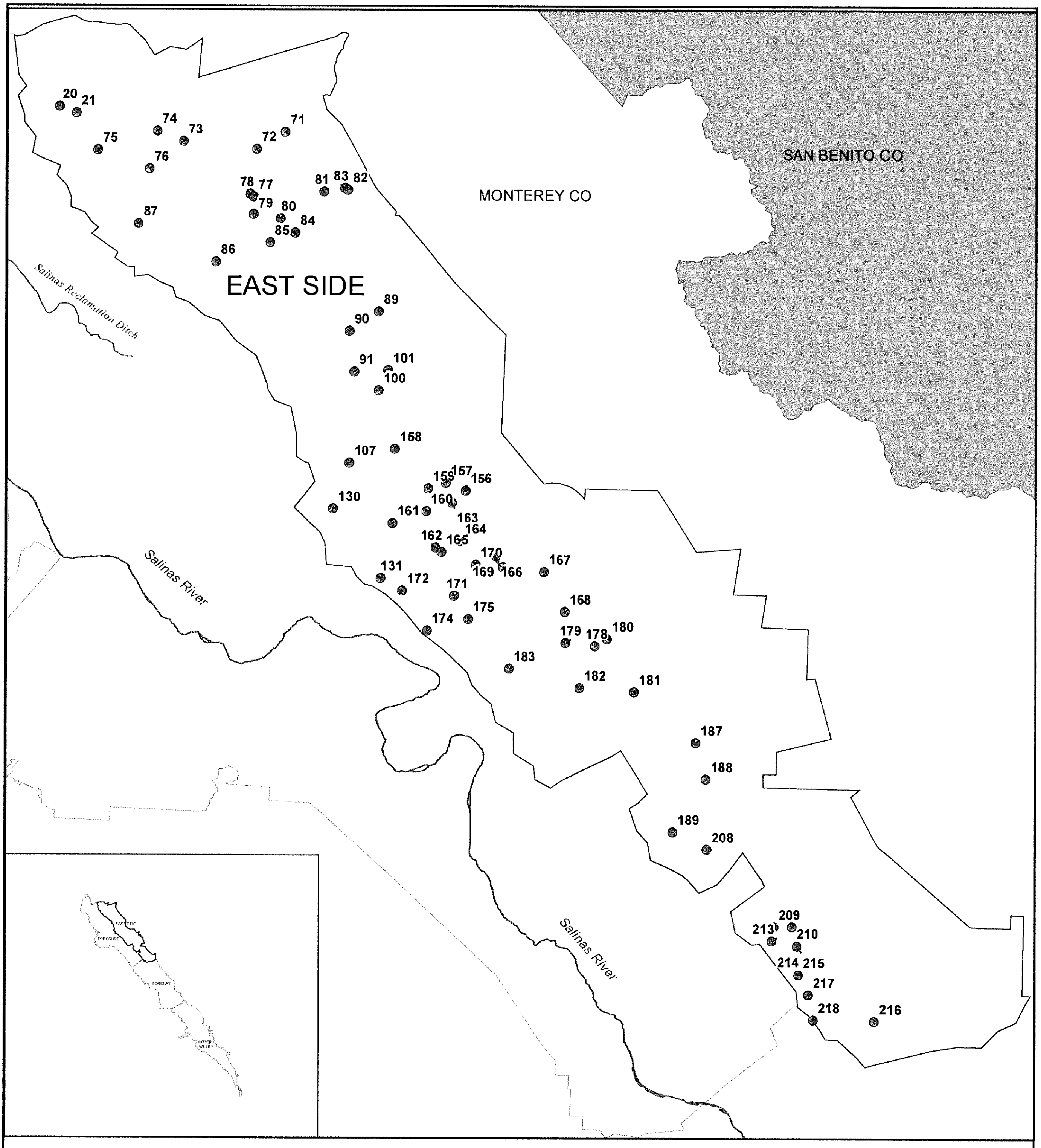
SUBAREA

- SUBAREA
- PRESSURE

0 0.75 1.5 2.25 3 Miles

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work.

Map Date: July 5, 2007



Salinas Valley Wells in the East Side Subarea

Figure 5

Legend:

- Study Well
- Rivers

SUBAREA

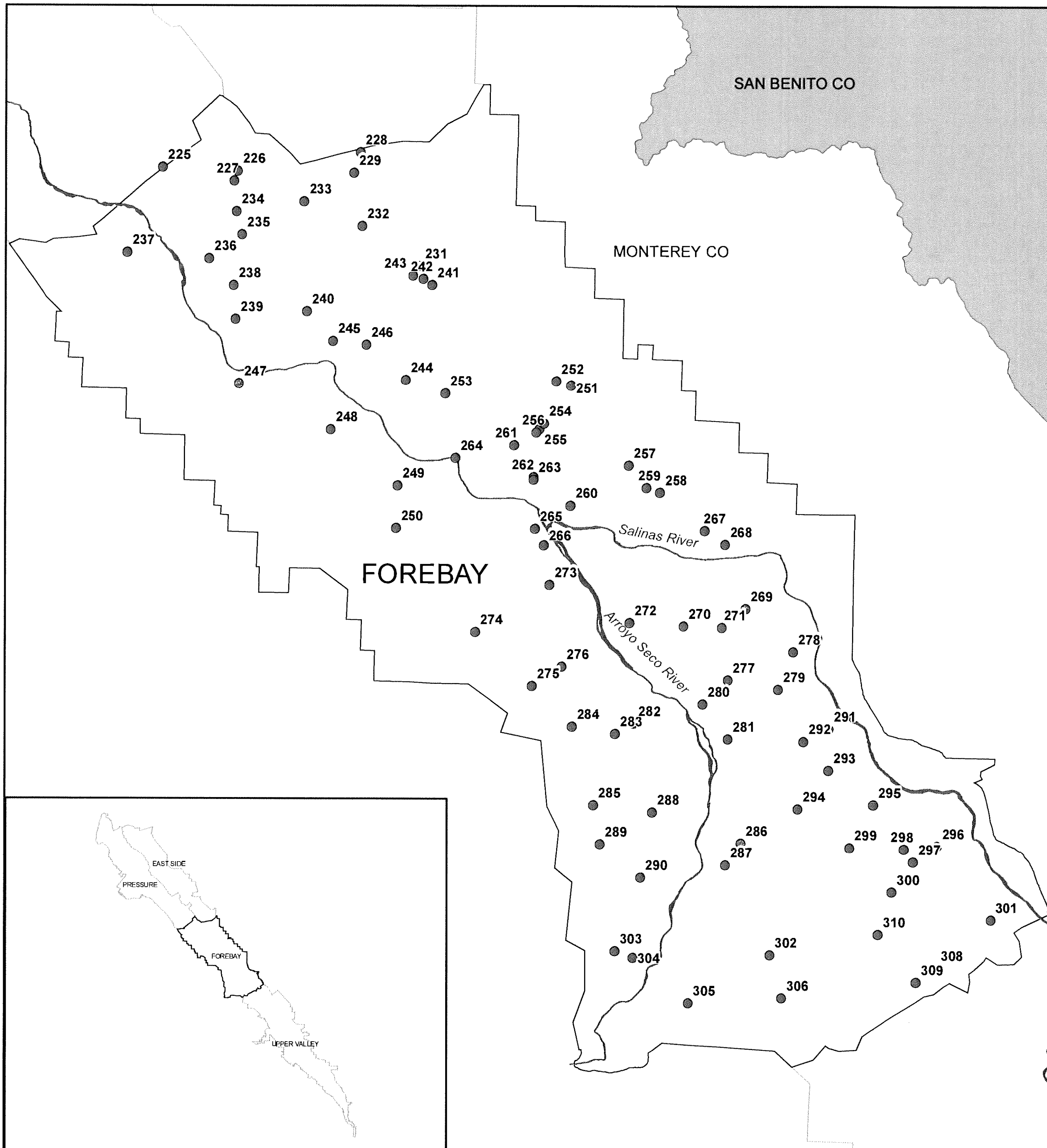
- SUBAREA
- EAST SIDE

N
W E
S

0 0.75 1.5 2.25 3 Miles

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work.

Map Date: July 5, 2007



Salinas Valley Wells in the Forebay Subarea

Figure 6

Legend:

- Study Well
- Rivers

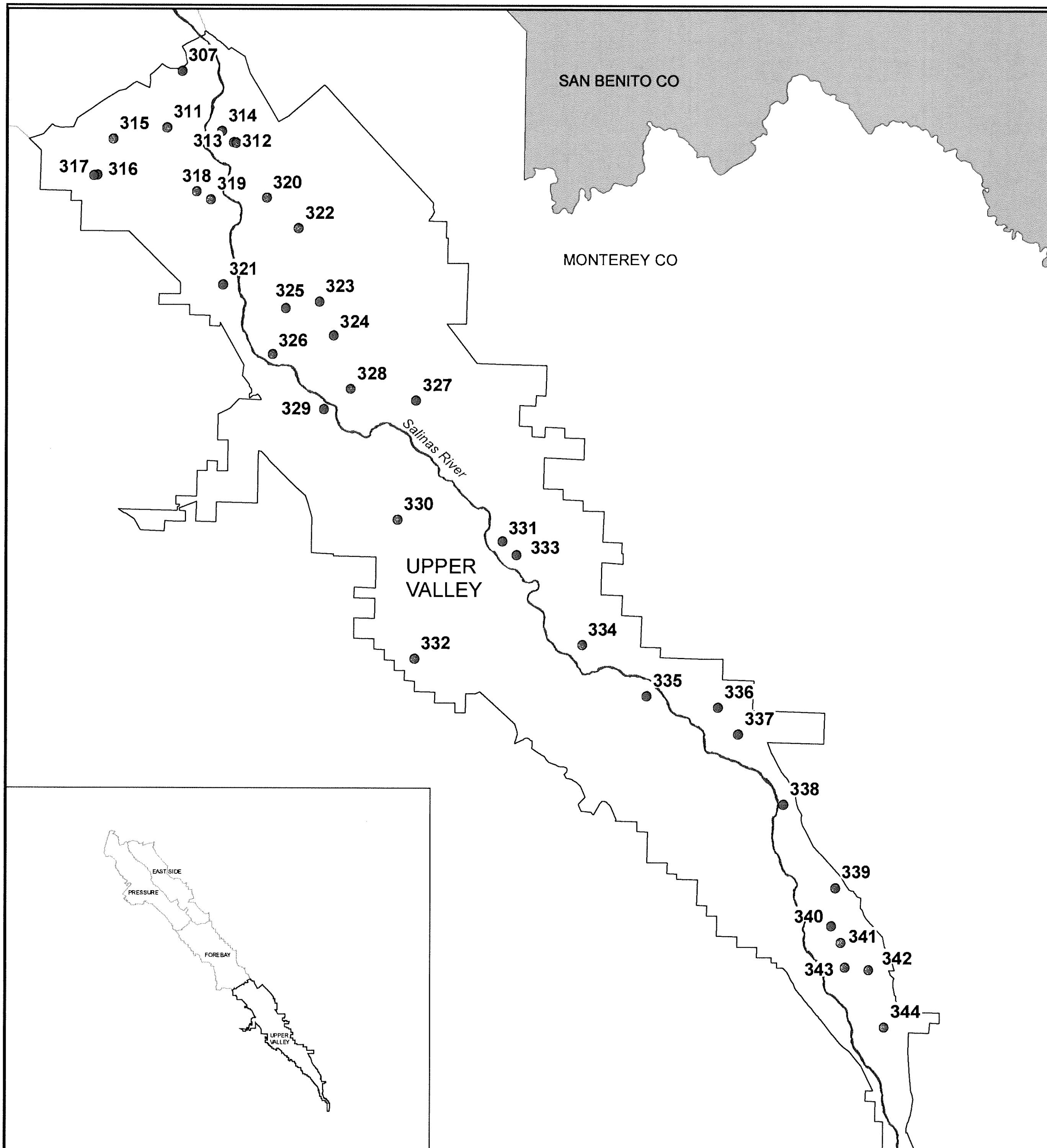
SUBAREA

- SUBAREA
- FOREBAY

0 0.75 1.5 2.25 3 Miles

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work.

Map Date: July 5, 2007



Salinas Valley Wells in the Upper Valley Subarea

Figure 7

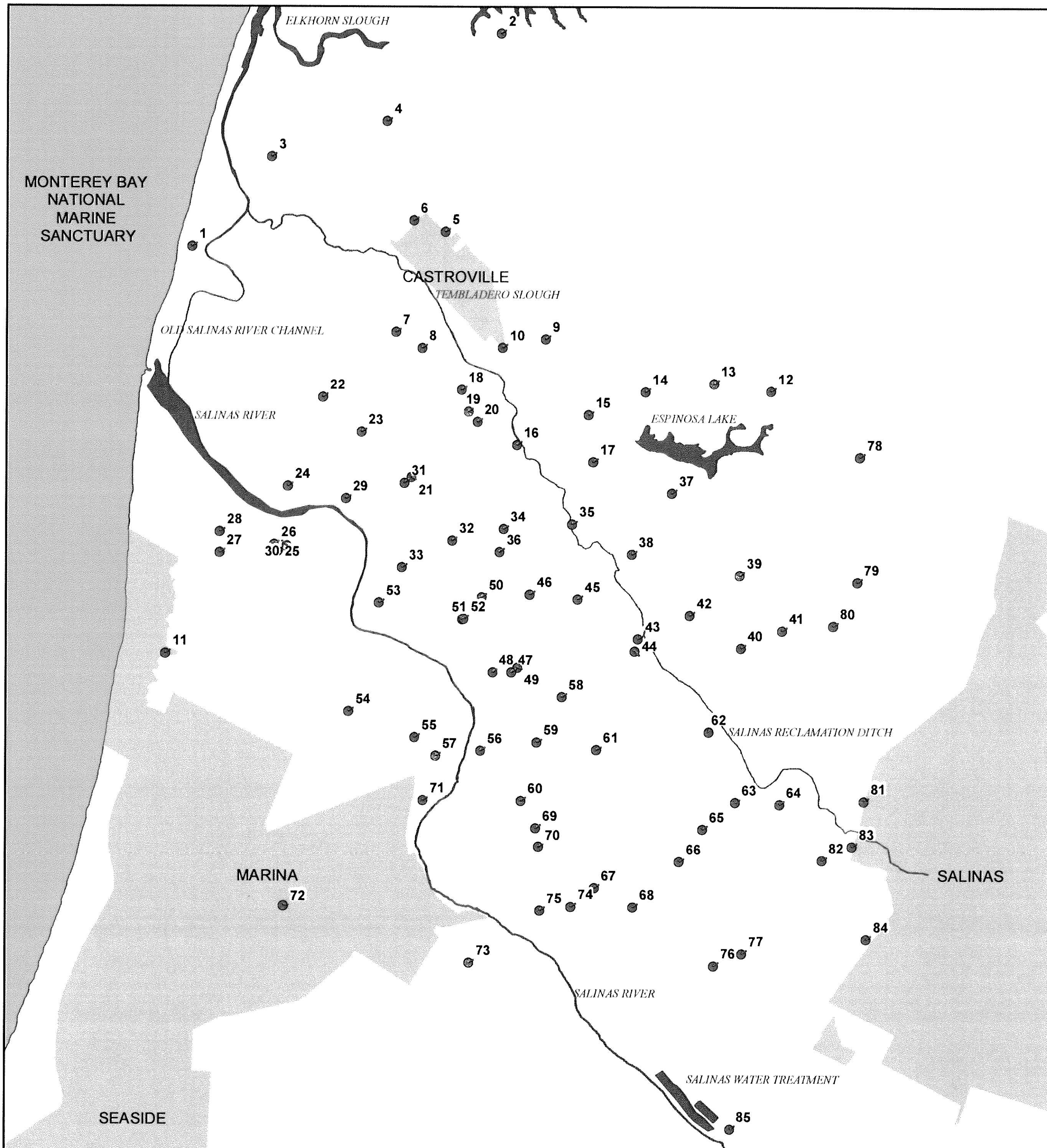
Legend:
- Study Well
- Rivers

SUBAREA
- SUBAREA
- UPPER VALLEY

0 0.75 1.5 2.25 3 Miles

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work.

Map Date: July 5, 2007



Coastal Ground Water Monitoring Program Wells

Figure 8

Legend:
- Study Well
- Cities
- Water Bodies/ Channels

0 0.5 1 1.5 2 Miles

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work.

Map Date: July 02, 2007

TABLES

Table 1 COMPLETE MINERAL PANEL ANALYTES

ANALYTE	*METHOD*	*LABORATORY MDL***	*LABORATORY PQL*	*LOWEST CALIB. STD.*	*PAL*
Calcium (Ca)	SM 3111 B[1]	0.02 mg/L	1.0 mg/L	1.0 mg/L	1.0 mg/L
CATION ANION BALANCE	Calculated	--	--	--	--
*Chloride (Cl)	EPA 300.0[2]	0.01 mg/L	1.0 mg/L	0.1 mg/L	1.0 mg/L
*Conductivity (SEC)	SM 2510 B	1 umho/cm @ 25 C	1 umho/cm @ 25 C	N/A	1 umho/cm @ 25 C
Magnesium (Mg)	SM 3111 B	0.005 mg/L[1]	1.0 mg/L	0.1 mg/L	1.0 mg/L
*Nitrate (NO3)	EPA 300.0	0.002 mg/L[2]	1.0 mg/L	0.1 mg/L	1.0 mg/L
pH (Laboratory)	SM 4500-H B	pH Units (2 sig figs)	pH Units (2 sig figs)	N/A	pH Units (2 sig figs)
Potassium (K)	SM 3111 B	0.025 mg/L[1]	0.1 mg/L	0.1 mg/L	0.1 mg/L
Sodium (Na)	SM 3111 B	0.03 mg/L[1]	1.0 mg/L	0.1 mg/L	1.0 mg/L
Sulfate (SO4)	EPA 300.0	0.03 mg/L[2]	1.0 mg/L	0.1 mg/L	1.0 mg/L
Total Alkalinity (as CaCO3)	SM 2320 B	1.0 mg/L	1.0 mg/L	N/A	1.0 mg/L

[1] = MDL study completed February 2007
[2] = MDL study completed May 2007
* = Partial Mineral Panel analytes
** = These are the laboratory's latest MDLs and supersede the MDLs listed in Appendix D-1.
MDL = method detection limit; PQL = practical quantitative limit; PAL = project action level
All laboratory results are bracketed by calibration standards. No "estimated" results (below the lowest calib std and above the MDL) are given to the Agency.

Table 2 QUALITY CONTROL REQUIREMENTS FOR LABORATORY ANALYSES

QA PROCEDURE	QA PARAMETER	FREQUENCY	CRITERION	CORRECTIVE ACTION
Field Blank	Field Contamination	1/20 field samples; 5% frequency	<MDL	Recollect sampling event or flag data if unable recollect
Field Duplicate	Field Precision	1/10 field samples for first two events; if criterion is met, then 1/20 field samples	RPD < 25%	Recollect sampling event or flag data if unable recollect
Method Blank	Analytical Contamination	3 per analytical batch	< RL	Reanalyze analytical batch
LCS (CRM)	Accuracy	1 per analytical batch	80-120% REC	Reanalyze analytical batch
Analytical Duplicate	Analytical Precision	1 per analytical batch	RPD < 25%	Reanalyze analytical batch
Matrix Spike	Matrix Interference and Accuracy	1 per analytical batch; at 3-10x the native conc.	75-125% REC	Reanalyze analytical batch
Matrix Spike Duplicate	Precision and Accuracy	1 per analytical batch; at 3-10x the native conc.	RPD <25%	Reanalyze analytical batch
Continuing Calibration	Analytical Control	1 per 10 sample runs	80-120% of initial slope	Reanalyze analytical batch
Assess percent of data successfully collected	Data Completeness	N/A	90%	N/A

MDL=Method Detection Limit; RPD=Relative Percent Difference; RL=Report Limit;

REC=Recovery; LCS=Laboratory Control Sample; CRM=Certified Reference Material

An analytical batch is defined as 20 or fewer samples.

Table 3 LABORATORY DATA QUAILITY OBJECTIVES (DQOs)

ANALYTE	*METHOD BLANK*	*LCS (CRM)*	*ANALYTICAL DUPLICATE*	*MATRIX SPIKE*	*MATRIX SPIKE DUPLICATE*	*CONTINUING CALIBRATION*
Calcium (Ca)	yes	yes	yes	yes	yes	yes
Chloride (Cl)	yes	yes	yes	yes	yes	yes
Conductivity (SEC)	yes	yes	yes	no	no	yes
Magnesium (Mg)	yes	yes	yes	yes	yes	yes
Nitrate (NO3)	yes	yes	yes	yes	yes	yes
pH (Laboratory)	no	yes	yes	no	no	yes
Potassium (K)	yes	yes	yes	yes	yes	yes
Sodium (Na)	yes	yes	yes	yes	yes	yes
Sulfate (SO4)	yes	yes	yes	yes	yes	yes
Total Alkalinity (as CaCO3)	yes	yes	yes	no	no	yes

Table 4 SALINAS VALLEY WELLS AND LOCATIONS

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
13S/01E-36J01	PRESSURE 900	1	5741483.0	2170847.00002
13S/02E-20M02	PRESSURE 400	2	5748878.5	2182094.25003
13S/02E-21N01	PRESSURE 400	3	5753018.5	2180456.75002
13S/02E-27L01	PRESSURE 180	4	5759500.0	2175572.50002
13S/02E-27M01	PRESSURE 400	5	5758010.0	2174784.50002
13S/02E-27P01	PRESSURE 400	6	5759593.5	2173660.50002
13S/02E-27Q02	PRESSURE 400	7	5761129.5	2173768.75002
13S/02E-28B01	PRESSURE 400	8	5755624.0	2177900.75002
13S/02E-28E01	PRESSURE 400	9	5752984.0	2176434.75002
13S/02E-29F02	PRESSURE 400	10	5749961.0	2177732.25002
13S/02E-29J01	PRESSURE 400	11	5751657.5	2175604.25002
13S/02E-31A02	PRESSURE 900	12	5746516.5	2173308.00002
13S/02E-31N02	PRESSURE 400	13	5743060.5	2168496.25002
13S/02E-32M02	PRESSURE 900	14	5748673.0	2170965.00002
13S/02E-32N01	PRESSURE 400	15	5747285.0	2169132.75003
13S/02E-33H03	PRESSURE 180	16	5757325.5	2171726.00002
13S/02E-33R01	PRESSURE 180	17	5756359.5	2169699.75003
13S/02E-34M02	PRESSURE 180	18	5757952.0	2169365.25003
13S/02E-34N01	PRESSURE 180	19	5758043.5	2168657.25003
13S/02E-36J01	EAST SIDE BOTH	20	5772057.0	2168257.00002
14S/02E-01A01	EAST SIDE	21	5773736.0	2167596.00002
14S/02E-02E02	PRESSURE 400	22	5763989.0	2166284.00003
14S/02E-03F02	PRESSURE 180	23	5759284.0	2165549.00003
14S/02E-03K02	PRESSURE 400	24	5760546.0	2164390.00002
14S/02E-05F04	PRESSURE 400	25	5749784.5	2166850.50002
14S/02E-05G03	PRESSURE 400	26	5750701.5	2166258.50002
14S/02E-05K01	PRESSURE 400	27	5750303.5	2164892.00002
14S/02E-05P02	PRESSURE 400	28	5749120.0	2163754.25002
14S/02E-06J03	PRESSURE 400	29	5747119.5	2164986.75002
14S/02E-06L01	PRESSURE 900	30	5743826.5	2165438.75002
14S/02E-06R02	PRESSURE 400	31	5746852.5	2163229.50003
14S/02E-07K01	PRESSURE 400	32	5744199.0	2160286.75002
14S/02E-08A01	PRESSURE 400	33	5751818.0	2162226.75002
14S/02E-09D03	PRESSURE 400	34	5753098.5	2162246.50002
14S/02E-09H03	PRESSURE 400	35	5756070.0	2161048.75002

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
14S/02E-09L02	PRESSURE 400	36	5754291.5	2160250.25002
14S/02E-09N01	PRESSURE 400	37	5752950.5	2158867.00003
14S/02E-10C01	PRESSURE 400	38	5759437.0	2162015.75002
14S/02E-10P02	PRESSURE 400	39	5759125.0	2158942.75002
14S/02E-11C01	PRESSURE 180	40	5764471.5	2161959.50002
14S/02E-11D01	PRESSURE 180	41	5764508.5	2161568.25002
14S/02E-12B01	PRESSURE 400	42	5771184.5	2161614.00002
14S/02E-12L02	PRESSURE 400	43	5770434.5	2159815.50002
14S/02E-12Q01	PRESSURE 400	44	5771537.0	2157088.75002
14S/02E-13B02	PRESSURE 180	45	5771526.0	2157219.75003
14S/02E-13D01	PRESSURE 180	46	5769699.5	2156883.75002
14S/02E-14B01	PRESSURE 180	47	5766275.0	2156434.00002
14S/02E-14N03	PRESSURE 400	48	5763230.0	2152205.50003
14S/02E-14R01	PRESSURE 180	49	5767842.5	2153580.50002
14S/02E-15B01	PRESSURE 400	50	5760275.5	2156533.25002
14S/02E-17B02	PRESSURE 400	51	5749990.5	2156598.25002
14S/02E-17C01	PRESSURE 180	52	5747844.0	2157381.75003
14S/02E-18A01	PRESSURE 400	53	5746233.0	2156686.25002
14S/02E-18C01	PRESSURE 400	54	5743827.5	2156787.25002
14S/02E-20B01	PRESSURE 180	55	5750165.5	2151711.75003
14S/02E-20B02	PRESSURE 180	56	5750001.0	2151554.75003
14S/02E-21F02	PRESSURE 180	57	5754169.5	2151251.50002
14S/02E-22H01	PRESSURE 400	58	5761690.5	2150902.75002
14S/02E-22H02	PRESSURE 180	59	5762674.0	2149777.00002
14S/02E-23A01	PRESSURE 180	60	5767130.0	2151399.50002
14S/02E-23F01	PRESSURE 180	61	5764570.5	2149971.00002
14S/02E-23L03	PRESSURE 400	62	5765164.5	2149382.00002
14S/02E-25D03	PRESSURE 400	63	5768753.5	2146325.50002
14S/02E-27K01	PRESSURE 180	64	5760536.0	2144212.25002
14S/02E-28H02	PRESSURE 180	65	5756940.5	2145354.75002
14S/02E-34A03	PRESSURE 400	66	5762394.5	2141097.75002
14S/02E-35L02	PRESSURE 400	67	5764879.0	2137944.25002
14S/02E-36H01	PRESSURE 180	68	5773015.5	2139158.50003
14S/02E-36J02	PRESSURE 400	69	5772268.5	2137939.00002
14S/02E-36R02	PRESSURE 400	70	5772326.5	2136698.50002
14S/03E-02E03	EAST SIDE BOTH	71	5794727.5	2165742.50002
14S/03E-03K01	EAST SIDE BOTH	72	5791884.0	2164011.25002

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
14S/03E-04E01	EAST SIDE BOTH	73	5784479.5	2164809.75002
14S/03E-05B02	EAST SIDE BOTH	74	5781839.5	2165837.25002
14S/03E-06L01	EAST SIDE SHALLOW	75	5775895.0	2163924.50003
14S/03E-08C01	EAST SIDE BOTH	76	5781050.5	2162072.25002
14S/03E-10F02	EAST SIDE	77	5791569.0	2159330.50002
14S/03E-10F03	EAST SIDE BOTH	78	5791236.5	2159578.00002
14S/03E-10P01	EAST SIDE	79	5791544.0	2157558.25002
14S/03E-10R02	EAST SIDE BOTH	80	5794251.5	2157151.00002
14S/03E-11H01	EAST SIDE SHALLOW	81	5798504.0	2159823.00002
14S/03E-12E01	EAST SIDE SHALLOW	82	5800865.5	2160009.25003
14S/03E-12E02	EAST SIDE	83	5800608.5	2160173.25003
14S/03E-14D01	EAST SIDE SHALLOW	84	5795697.5	2155748.25003
14S/03E-15H03	EAST SIDE BOTH	85	5793222.5	2154777.00002
14S/03E-16K03	EAST SIDE	86	5787748.0	2152845.50003
14S/03E-17D01	EAST SIDE	87	5779979.0	2156594.00002
14S/03E-20D01	PRESSURE 400	88	5779540.0	2150357.75002
14S/03E-24H01	EAST SIDE SHALLOW	89	5803951.0	2147934.50002
14S/03E-24N01	EAST SIDE	90	5801060.0	2146002.50002
14S/03E-25L02	EAST SIDE BOTH	91	5801508.5	2141975.75002
14S/03E-28B02	PRESSURE 400	92	5786919.0	2145249.50002
14S/03E-28F02	PRESSURE 400	93	5786200.6	2144963.98574
14S/03E-29L04	PRESSURE 180	94	5780547.4	2143125.21920
14S/03E-30E01	PRESSURE 180	95	5773899.5	2144670.25003
14S/03E-30F02	PRESSURE 180	96	5775180.5	2144268.50002
14S/03E-30N01	PRESSURE 180	97	5774083.5	2141696.50002
14S/03E-31F01	PRESSURE 180	98	5775271.5	2138346.50003
14S/03E-31F02	PRESSURE 400	99	5775228.5	2138492.00002
14S/03E-36A01	EAST SIDE SHALLOW	100	5803921.0	2140085.50002
14S/04E-30N01	EAST SIDE BOTH	101	5804847.5	2142132.00001
15S/02E-01A03	PRESSURE 400	102	5772482.0	2134724.00002
15S/02E-01K01	PRESSURE 180	103	5770291.5	2131514.75002
15S/02E-02G01	PRESSURE 400	104	5765615.0	2134401.50002
15S/02E-12A01	PRESSURE 400	105	5772051.5	2129878.50002
15S/02E-12R01	PRESSURE 400	106	5772057.5	2126203.25003
15S/03E-01L01	EAST SIDE	107	5801038.5	2132896.75002
15S/03E-04K03	PRESSURE 400	108	5785732.5	2131172.00002
15S/03E-04N03	PRESSURE 400	109	5783621.0	2130577.75002

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
15S/03E-05N01	PRESSURE 180	110	5778619.0	2130164.00003
15S/03E-06A03	PRESSURE 180	111	5777613.0	2135010.00002
15S/03E-06D02	PRESSURE 400	112	5773392.0	2135175.75002
15S/03E-06F02	PRESSURE 400	113	5774781.5	2132857.75002
15S/03E-06K01	PRESSURE 400	114	5776302.5	2131605.50002
15S/03E-07D02	PRESSURE 400	115	5772729.0	2130304.25002
15S/03E-07G01	PRESSURE 400	116	5775356.0	2127909.75002
15S/03E-07N01	PRESSURE 180	117	5772911.5	2126430.50002
15S/03E-08B04	PRESSURE 400	118	5780790.5	2128738.25002
15S/03E-08C06	PRESSURE 180	119	5780025.5	2129640.75003
15S/03E-08C07	PRESSURE 400	120	5780124.5	2129385.50002
15S/03E-08F07	PRESSURE 400	121	5779786.0	2128096.50002
15S/03E-08N03	PRESSURE 400	122	5778859.5	2125760.50002
15S/03E-09B01	PRESSURE 180	123	5787613.5	2129526.50003
15S/03E-09C01	PRESSURE 180	124	5785912.0	2130387.75002
15S/03E-09H02	PRESSURE 180	125	5788543.5	2128841.50003
15S/03E-09K04	PRESSURE 400	126	5786815.0	2126625.50003
15S/03E-10P01	PRESSURE 180	127	5789973.0	2124641.25002
15S/03E-10P03	PRESSURE 180	128	5790992.5	2124075.25002
15S/03E-10R02	PRESSURE 180	129	5793537.5	2125764.25002
15S/03E-12E02	EAST SIDE BOTH	130	5799472.0	2128349.25000
15S/03E-13J02	EAST SIDE	131	5804170.5	2121482.50002
15S/03E-13N01	PRESSURE 180	132	5799834.5	2120075.00003
15S/03E-14C01	PRESSURE 180	133	5796323.5	2123063.75002
15S/03E-14G01	PRESSURE 180	134	5796738.0	2122656.50003
15S/03E-14H01	PRESSURE 180	135	5797941.0	2122606.00002
15S/03E-15B01	PRESSURE 400	136	5792336.0	2124219.00002
15S/03E-15L02	PRESSURE 180	137	5790177.0	2121393.00002
15S/03E-16B03	PRESSURE 400	138	5786481.0	2123545.50002
15S/03E-16M01	PRESSURE 180	139	5783233.5	2121388.25002
15S/03E-17B01	PRESSURE 180	140	5781259.5	2123911.75003
15S/03E-17B02	PRESSURE 180	141	5781099.5	2123757.50002
15S/03E-17G01	PRESSURE 180	142	5780630.0	2122750.25002
15S/03E-18B01	PRESSURE 180	143	5776074.5	2124737.50002
15S/03E-21A01	PRESSURE 180	144	5787617.0	2118056.00002
15S/03E-22F02	PRESSURE 180	145	5789756.5	2117099.00002
15S/03E-22G01	PRESSURE 180	146	5791343.0	2116241.25002

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
15S/03E-25L01	PRESSURE 180	147	5800408.5	2109728.50003
15S/03E-26A01	PRESSURE 400	148	5797857.5	2112518.00002
15S/03E-26D01	PRESSURE 180	149	5794548.5	2112893.75003
15S/03E-26H02	PRESSURE 180	150	5797573.5	2111904.75002
15S/03E-26P01	PRESSURE 400	151	5795686.5	2108925.25002
15S/03E-27J01	PRESSURE 400	152	5792207.5	2110413.00002
15S/03E-28B02	PRESSURE 400	153	5787075.5	2113993.25002
15S/03E-28G01	PRESSURE 180	154	5786358.0	2111546.50003
15S/03E-35B05	PRESSURE 180	155	5797153.0	2107813.50003
15S/04E-05K01	EAST SIDE	156	5812585.0	2130171.00001
15S/04E-05M01	EAST SIDE BOTH	157	5810608.5	2130920.50001
15S/04E-06D04	EAST SIDE BOTH	158	5805535.0	2134296.75001
15S/04E-06R01	EAST SIDE BOTH	159	5808832.0	2130397.50001
15S/04E-07A01	EAST SIDE BOTH	160	5808667.0	2128112.25001
15S/04E-07E02	EAST SIDE	161	5805290.0	2126918.25001
15S/04E-07R01	EAST SIDE SHALLOW	162	5809617.5	2124497.75001
15S/04E-08C01	EAST SIDE SHALLOW	163	5811226.0	2128961.75001
15S/04E-08L01	EAST SIDE BOTH	164	5812038.0	2125163.50001
15S/04E-08N01	EAST SIDE BOTH	165	5810237.5	2124086.00001
15S/04E-09N01	EAST SIDE	166	5815679.0	2123673.25001
15S/04E-15D02	EAST SIDE SHALLOW	167	5820525.5	2122131.50001
15S/04E-15P02	EAST SIDE BOTH	168	5822591.0	2118164.75001
15S/04E-16D01	EAST SIDE BOTH	169	5816370.5	2122604.00001
15S/04E-17B01	EAST SIDE	170	5813674.5	2122802.00001
15S/04E-17P02	EAST SIDE SHALLOW	171	5811444.0	2119748.75001
15S/04E-18L01	EAST SIDE	172	5806258.0	2120249.25001
15S/04E-19D02	PRESSURE 400	173	5805231.0	2118084.25001
15S/04E-19H03	EAST SIDE	174	5808765.0	2116311.75003
15S/04E-20B02	EAST SIDE SHALLOW	175	5812893.0	2117437.00001
15S/04E-20N01	PRESSURE 400	176	5810999.0	2113437.25001
15S/04E-20Q01	EAST SIDE	177	5813019.5	2113916.75003
15S/04E-22J01	EAST SIDE	178	5825620.5	2114797.50001
15S/04E-22L02	EAST SIDE BOTH	179	5822626.0	2115130.25001
15S/04E-23M01	EAST SIDE	180	5826800.0	2115510.00001
15S/04E-26G01	EAST SIDE	181	5829452.0	2110273.75001
15S/04E-27G01	EAST SIDE BOTH	182	5824082.0	2110658.00001
15S/04E-28C01	EAST SIDE	183	5817013.0	2112539.50001

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
15S/04E-28C01	EAST SIDE	184*	*	*
15S/04E-29K03	EAST SIDE	185*	*	*
15S/04E-32E01	PRESSURE 180	186	5809573.0	2105524.75003
15S/04E-36H01	EAST SIDE BOTH	187	5835591.5	2105235.00001
15S/04E-36R02	EAST SIDE BOTH	188	5836592.5	2101652.75001
16S/04E-01L02	EAST SIDE	189	5833261.5	2096387.25003
16S/04E-04C01	PRESSURE 400	190	5816563.5	2101653.00001
16S/04E-08J01	PRESSURE 180	191	5814399.5	2094772.87501
16S/04E-09A01	PRESSURE 180	192	5818962.5	2096385.75001
16S/04E-10K01	PRESSURE 400	193	5822871.5	2093933.87501
16S/04E-10R02	PRESSURE 400	194	5824891.5	2092808.00001
16S/04E-11E02	PRESSURE 400	195	5825734.0	2093587.12501
16S/04E-12M01	PRESSURE 400	196	5830110.0	2094179.62501
16S/04E-13D01	PRESSURE 400	197	5829977.5	2091400.75001
16S/04E-14M01	PRESSURE 400	198	5826507.0	2089158.00001
16S/04E-14M02	PRESSURE 400	199	5826934.0	2088314.12501
16S/04E-15D01	PRESSURE 180	200	5820915.5	2091029.00003
16S/04E-15H02	PRESSURE 400	201	5824314.0	2089470.00001
16S/04E-24R01	PRESSURE 400	202	5833826.5	2081330.00003
16S/04E-25A01	PRESSURE 400	203	5834115.0	2080854.00001
16S/04E-25K01	PRESSURE 180	204	5832503.0	2077482.12501
16S/04E-25Q01	PRESSURE 400	205	5832125.5	2076199.75001
16S/04E-27G01	PRESSURE 180	206	5823057.0	2078926.75001
16S/04E-36B01	PRESSURE 180	207	5833029.5	2074811.87501
16S/05E-07G01	EAST SIDE BOTH	208	5836648.0	2094674.00003
16S/05E-17P01	EAST SIDE BOTH	209	5843361.0	2086999.12503
16S/05E-17R01	EAST SIDE SHALLOW	210	5845212.0	2087024.25003
16S/05E-19F01	PRESSURE 180	211	5836477.0	2084158.37503
16S/05E-19R01	PRESSURE 180	212	5840423.0	2081360.37503
16S/05E-20C01	EAST SIDE	213	5843125.0	2085585.12503
16S/05E-20H01	EAST SIDE	214	5845691.0	2085074.25003
16S/05E-20R01	EAST SIDE BOTH	215	5845834.0	2082220.00003
16S/05E-27G01	EAST SIDE	216	5853466.8	2077678.05320
16S/05E-28D01	EAST SIDE BOTH	217	5846865.0	2080272.25003
16S/05E-28P01	EAST SIDE BOTH	218	5847355.5	2077784.37503
16S/05E-30C01	PRESSURE 180	219	5836401.5	2080129.50003
16S/05E-30G01	PRESSURE 180	220	5837912.0	2078876.87503

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
16S/05E-30J02	PRESSURE 400	221	5840526.5	2077512.50003
16S/05E-31A01	PRESSURE 180	222	5838804.0	2075067.12503
16S/05E-31Q01	PRESSURE 180	223	5837656.0	2070857.75003
16S/05E-32C01	PRESSURE 180	224	5843159.0	2075228.62503
16S/05E-32M01	FOREBAY	225	5840439.0	2072879.00003
16S/05E-33F01	FOREBAY	226	5847064.0	2072544.75003
16S/05E-33Q01	FOREBAY	227	5846731.0	2071679.00003
16S/05E-35C01	FOREBAY	228	5857923.0	2074215.75003
16S/05E-35L01	FOREBAY	229	5857341.0	2072381.25003
17S/04E-01D01	PRESSURE 180	230	5829970.4	2070190.88233
17S/05E-01R01	FOREBAY	231	5863270.5	2064114.75003
17S/05E-02G01	FOREBAY	232	5858061.5	2067655.75001
17S/05E-03B01	FOREBAY	233	5852910.5	2069821.37503
17S/05E-04C01	FOREBAY	234	5846947.5	2068985.25003
17S/05E-04K01	FOREBAY	235	5847433.5	2066928.37503
17S/05E-04N01	FOREBAY	236	5844523.0	2064819.50003
17S/05E-06Q01	FOREBAY	237	5837274.0	2065350.12503
17S/05E-09G01	FOREBAY	238	5846689.0	2062431.75003
17S/05E-09Q01	FOREBAY	239	5846868.5	2059437.25003
17S/05E-10Q01	FOREBAY	240	5853142.5	2060133.00003
17S/05E-12B01	FOREBAY	241	5864362.0	2062470.37503
17S/05E-12B02	FOREBAY	242	5863570.5	2063023.50003
17S/05E-12B03	FOREBAY	243	5862636.0	2063300.00003
17S/05E-13L02	FOREBAY	244	5861995.0	2054065.12503
17S/05E-14D01	FOREBAY	245	5855476.7	2057512.98904
17S/05E-14G01	FOREBAY	246	5858431.5	2057156.87503
17S/05E-21A01	FOREBAY	247	5847203.9	2053734.78530
17S/05E-23L01	FOREBAY	248	5855276.5	2049667.00003
17S/05E-25L01	FOREBAY	249	5861282.5	2044709.87503
17S/05E-36F02	FOREBAY	250	5861156.5	2040988.13679
17S/06E-16N01	FOREBAY	251	5876658.0	2053579.37503
17S/06E-17R01	FOREBAY	252	5875370.0	2053960.00003
17S/06E-19D01	FOREBAY	253	5865512.0	2052870.75003
17S/06E-20K01	FOREBAY	254	5874270.5	2050202.50003
17S/06E-20Q02	FOREBAY	255	5873861.0	2049734.12503
17S/06E-20Q03	FOREBAY	256	5873624.0	2049413.37503
17S/06E-27E03	FOREBAY	257	5881725.5	2046512.12503

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
17S/06E-27K01	FOREBAY	258	5884526.5	2044144.50003
17S/06E-27L01	FOREBAY	259	5883319.0	2044534.62503
17S/06E-28N01	FOREBAY	260	5876603.5	2042971.37503
17S/06E-29C01	FOREBAY	261	5871659.0	2048323.00003
17S/06E-29K01	FOREBAY	262	5873377.5	2045490.50003
17S/06E-29Q01	FOREBAY	263	5873361.0	2045274.25003
17S/06E-30F01	FOREBAY	264	5866434.0	2047190.00003
17S/06E-32G01	FOREBAY	265	5873481.5	2040947.12503
17S/06E-32J02	FOREBAY	266	5874264.0	2039466.50003
17S/06E-35F01	FOREBAY	267	5888535.0	2040776.00003
17S/06E-35J01	FOREBAY	268	5890370.5	2039573.75003
18S/06E-01E01	FOREBAY	269	5892201.0	2033873.12503
18S/06E-02N01	FOREBAY	270	5886656.0	2032336.12503
18S/06E-02R01	FOREBAY	271	5890070.0	2032210.75003
18S/06E-03P01	FOREBAY	272	5881836.0	2032629.37503
18S/06E-05H01	FOREBAY	273	5874765.0	2035980.12503
18S/06E-07A01	FOREBAY	274	5868250.5	2031805.25003
18S/06E-08R01	FOREBAY	275	5873246.0	2027074.87503
18S/06E-09M02	FOREBAY	276	5875856.5	2028751.00003
18S/06E-11J01	FOREBAY	277	5890622.5	2027590.87503
18S/06E-12A01	FOREBAY	278	5896424.0	2030093.87503
18S/06E-12R02	FOREBAY	279	5895096.5	2026768.25003
18S/06E-14B01	FOREBAY	280	5888379.5	2025469.87503
18S/06E-14R01	FOREBAY	281	5890625.0	2022391.37503
18S/06E-15F01	FOREBAY	282	5882187.0	2023781.12503
18S/06E-15M01	FOREBAY	283	5880584.0	2022838.50003
18S/06E-16L01	FOREBAY	284	5876773.5	2023478.50003
18S/06E-21Q01	FOREBAY	285	5878665.0	2016542.37503
18S/06E-25F01	FOREBAY	286	5891762.0	2013188.12503
18S/06E-26R01	FOREBAY	287	5890408.5	2011271.25003
18S/06E-27A01	FOREBAY	288	5883864.0	2015914.75003
18S/06E-28J01	FOREBAY	289	5879251.0	2013091.87503
18S/06E-34B01	FOREBAY	290	5882838.0	2010128.37503
18S/07E-18K01	FOREBAY	291	5899619.5	2023322.62503
18S/07E-18P01	FOREBAY	292	5897367.5	2022162.75003
18S/07E-19G02	FOREBAY	293	5899561.5	2019657.12503
18S/07E-19N01	FOREBAY	294	5896875.0	2016213.75002

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
18S/07E-20K01	FOREBAY	295	5903526.5	2016596.50003
18S/07E-28K01	FOREBAY	296	5909064.5	2012996.12503
18S/07E-28N02	FOREBAY	297	5906995.5	2011573.25003
18S/07E-29J01	FOREBAY	298	5906172.5	2012704.50003
18S/07E-29M01	FOREBAY	299	5901432.0	2012790.87503
18S/07E-32G02	FOREBAY	300	5905129.0	2008896.37503
18S/07E-34P02	FOREBAY	301	5913853.5	2006429.50003
19S/06E-01H01	FOREBAY	302	5894418.0	2003322.50003
19S/06E-03E02	FOREBAY	303	5880577.0	2003637.62503
19S/06E-03K01	FOREBAY	304	5882172.5	2003068.00003
19S/06E-11C01	FOREBAY	305	5887118.5	1999053.25003
19S/06E-12A01	FOREBAY	306	5895441.5	1999532.50003
19S/07E-03H02	UPPER VALLEY	307	5916058.0	2002263.25003
19S/07E-04G01	FOREBAY	308	5908976.0	2002192.50003
19S/07E-04Q01	FOREBAY	309	5907241.5	2000938.12503
19S/07E-05B02	FOREBAY	310	5903922.5	2005128.00003
19S/07E-10P02	UPPER VALLEY	311	5914112.0	1994937.37503
19S/07E-13D01	UPPER VALLEY	312	5923060.5	1993005.87503
19S/07E-13D02	UPPER VALLEY	313	5922703.0	1993016.87503
19S/07E-13D03	UPPER VALLEY	314	5921177.5	1994464.25003
19S/07E-16D01	UPPER VALLEY	315	5907215.0	1993447.25003
19S/07E-20A01	UPPER VALLEY	316	5904728.0	1988737.75003
19S/07E-20A02	UPPER VALLEY	317	5905140.0	1988780.50003
19S/07E-23F01	UPPER VALLEY	318	5917918.5	1986682.87503
19S/07E-23G01	UPPER VALLEY	319	5919819.5	1985678.50003
19S/07E-24H02	UPPER VALLEY	320	5927076.5	1985899.12503
19S/07E-36N01	UPPER VALLEY	321	5921376.0	1974705.75003
19S/08E-30A01	UPPER VALLEY	322	5931268.5	1981945.62503
20S/08E-05C02	UPPER VALLEY	323	5933968.0	1972500.37503
20S/08E-05R03	UPPER VALLEY	324	5935855.5	1968133.00003
20S/08E-06B01	UPPER VALLEY	325	5929631.0	1971657.50003
20S/08E-07E01	UPPER VALLEY	326	5927847.5	1965744.25003
20S/08E-15H03	UPPER VALLEY	327	5946414.0	1959720.37503
20S/08E-16C01	UPPER VALLEY	328	5938055.0	1961243.37501
20S/08E-17K03	UPPER VALLEY	329	5934573.0	1958618.62503
20S/08E-34G01	UPPER VALLEY	330	5944061.5	1944379.50003
20S/08E-36R01	UPPER VALLEY	331	5957517.0	1941628.62503

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
21S/08E-15J01	UPPER VALLEY	332	5946267.0	1926489.62503
21S/09E-06C01	UPPER VALLEY	333	5959365.5	1939884.62503
21S/09E-16E02	UPPER VALLEY	334	5967913.5	1928310.37503
21S/09E-22J01	UPPER VALLEY	335	5976378.5	1921774.75003
21S/09E-24Q01	UPPER VALLEY	336	5985537.5	1920320.00003
21S/10E-30E02	UPPER VALLEY	337	5988110.5	1916891.25003
21S/10E-32N01	UPPER VALLEY	338	5993930.5	1907839.00003
22S/10E-09P01	UPPER VALLEY	339	6000619.0	1897117.87503
22S/10E-16P01	UPPER VALLEY	340	6000072.0	1892154.87503
22S/10E-21C01	UPPER VALLEY	341	6001268.5	1890089.75003
22S/10E-22N01	UPPER VALLEY	342	6004921.0	1886561.87503
22S/10E-28B01	UPPER VALLEY	343	6001816.0	1886849.25003
22S/10E-34G01	UPPER VALLEY	344	6007012.0	1879185.87503

[1] State Plane Coordinate System, California Zone IV, Feet, North American Datum 1983

*Coordinates to be collected

Table 5 COASTAL WELLS AND LOCATIONS

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
13S/01E-25R01	PRESSURE 900	1	5742345.5	2174687.00002
13S/02E-15M01	PRUNEDALE	2	5757881.5	2185405.50002
13S/02E-19Q03	PRESSURE 900	3	5746313.5	2179184.50002
13S/02E-20J01	PRESSURE 400	4	5752096.0	2180981.25002
13S/02E-28L02	PRESSURE BOTH	5	5755055.5	2175441.75002
13S/02E-28M02	PRESSURE 400	6	5753447.0	2175997.50002
13S/02E-32J03	PRESSURE 400	7	5752560.0	2170401.75002
13S/02E-33N04	PRESSURE 400	8	5753898.0	2169605.00002
13S/02E-34G01	PRESSURE 400	9	5760129.5	2170052.25002
13S/02E-34M01	PRESSURE 400	10	5757997.5	2169621.75002
14S/01E-13J02	PRESSURE 400	11	5741048.0	2154289.50002
14S/02E-01C01	EASTSIDE DEEP	12	5771477.5	2167454.25002
14S/02E-02A02	EASTSIDE DEEP	13	5768561.0	2167823.50002
14S/02E-02C03	PRESSURE 400	14	5765109.0	2167416.00002
14S/02E-03H01	PRESSURE 400	15	5762283.0	2166255.50002
14S/02E-03M02	PRESSURE 400	16	5758710.5	2164740.50002
14S/02E-03R02	PRESSURE 400	17	5762517.0	2163892.75002
14S/02E-04B01	PRESSURE 400	18	5755909.0	2167499.00002
14S/02E-04G02	PRESSURE 400	19	5756262.0	2166403.75002
14S/02E-04H01	PRESSURE 400	20	5756715.0	2165886.25002
14S/02E-04N03	PRESSURE 400	21	5753365.0	2163112.75002
14S/02E-05C03	PRESSURE 400	22	5748893.5	2167132.50002
14S/02E-05K02	PRESSURE 400	23	5750829.0	2165370.75002
14S/02E-07A01	PRESSURE 400	24	5747142.5	2162655.25002
14S/02E-07J02	PRESSURE 400	25	5746655.0	2159408.25002
14S/02E-07J03	PRESSURE DEEP ZONE	26	5746476.9	2159735.06998
14S/02E-07L04	PRESSURE 400	27	5743780.0	2159328.00002
14S/02E-07L05	PRESSURE 400	28	5743784.5	2160380.50002
14S/02E-08C03	PRESSURE 400	29	5750055.0	2162036.75002
14S/02E-08M02	PRESSURE 400	30	5747103.0	2159672.50002
14S/02E-09D04	PRESSURE 400	31	5753016.5	2162818.75002
14S/02E-09K02	PRESSURE 400	32	5755450.0	2159946.25002
14S/02E-09N02	PRESSURE 400	33	5752897.5	2158609.50002
14S/02E-10E02	PRESSURE 400	34	5758062.0	2160525.75002
14S/02E-10H01	PRESSURE 400	35	5761492.0	2160761.75002

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
14S/02E-10M02	PRESSURE 400	36	5757853.5	2159387.75002
14S/02E-11B01	PRESSURE 400	37	5766446.0	2162325.25002
14S/02E-11M03	PRESSURE 400	38	5764448.5	2159266.75002
14S/02E-12N02	PRESSURE 180	39	5769893.5	2158219.50002
14S/02E-13F01	PRESSURE 180	40	5769952.5	2154587.75002
14S/02E-13G01	PRESSURE 400	41	5772057.5	2155470.50002
14S/02E-14A01	PRESSURE 400	42	5767367.0	2156210.25002
14S/02E-14L02	PRESSURE 180	43	5764775.5	2155024.75003
14S/02E-14L03	PRESSURE 400	44	5764610.5	2154419.75002
14S/02E-15A01	PRESSURE 400	45	5761774.5	2157015.50002
14S/02E-15C02	PRESSURE 400	46	5759385.5	2157259.00002
14S/02E-15L02	PRESSURE 180	47	5758452.0	2153366.00003
14S/02E-15N01	PRESSURE 400	48	5757522.5	2153353.25002
14S/02E-15P01	PRESSURE 400	49	5758767.5	2153584.50002
14S/02E-16A02	PRESSURE 400	50	5756957.5	2157123.50002
14S/02E-16G01	PRESSURE 400	51	5755957.0	2155999.50002
14S/02E-16H01	PRESSURE 400	52	5756041.0	2156035.25002
14S/02E-17A02	PRESSURE 400	53	5751744.5	2156837.50002
14S/02E-20B03	PRESSURE 900	54	5750210.5	2151407.25003
14S/02E-21E01	PRESSURE 400	55	5753561.0	2150101.50003
14S/02E-21J01	PRESSURE 180	56	5756896.0	2149447.75002
14S/02E-21L01	PRESSURE 180	57	5754605.0	2149175.75002
14S/02E-22B01	PRESSURE 400	58	5760986.0	2152124.75002
14S/02E-22L01	PRESSURE 400	59	5759725.0	2149855.00002
14S/02E-22P02	PRESSURE 180	60	5758952.5	2146937.25002
14S/02E-23M01	PRESSURE 180	61	5762708.0	2149478.75002
14S/02E-24E01	PRESSURE 180	62	5768326.5	2150393.25002
14S/02E-24P02	PRESSURE 400	63	5769670.0	2146858.75002
14S/02E-24Q01	PRESSURE 180	64	5771942.5	2146772.50003
14S/02E-25D04	PRESSURE 180	65	5768019.0	2145519.50003
14S/02E-26J03	PRESSURE 400	66	5766847.5	2143883.00002
14S/02E-26N03	PRESSURE 180	67	5762617.0	2142567.75002
14S/02E-26P01	PRESSURE 180	68	5764519.0	2141615.00003
14S/02E-27C02	PRESSURE 400	69	5759686.0	2145562.00002
14S/02E-27F02	PRESSURE 180	70	5759825.0	2144647.75002
14S/02E-28C01	PRESSURE 400	71	5753983.5	2146953.50002
14S/02E-32D06	PRESSURE 180	72	5746981.0	2141653.75003

STATE WELL NUMBER	AQUIFER	MAP ID	FALSE EASTING[1]	FALSE NORTHING[1]
14S/02E-33P01	PRESSURE BOTH	73	5756348.0	2138806.75003
14S/02E-34A04	PRESSURE 180	74	5761465.0	2141623.00002
14S/02E-34B03	PRESSURE 180	75	5759909.5	2141431.00002
14S/02E-36E01	PRESSURE 180	76	5768600.0	2138685.00002
14S/02E-36G01	PRESSURE 400	77	5770039.0	2139297.50002
14S/03E-06L02	EASTSIDE DEEP	78	5775957.0	2164155.50002
14S/03E-07P02	EASTSIDE SHALLOW	79	5775832.0	2157899.00003
14S/03E-18E02	PRESSURE 400	80	5774633.5	2155704.50003
14S/03E-19Q02	PRESSURE 180	81	5776192.0	2146948.50002
14S/03E-30E03	PRESSURE 400	82	5774081.0	2143975.75002
14S/03E-30F01	PRESSURE 180	83	5775609.5	2144673.00002
14S/03E-31B01	PRESSURE 180	84	5776312.0	2140030.50002
15S/02E-12C01	PRESSURE 180	85	5769441.0	2130513.75002

[1] State Plane Coordinate System, California Zone IV, Feet, North American Datum 1983

Table 6 REQUIREMENTS FOR SAMPLE COLLECTION[1]

ANALYTE	CONTAINER TYPE	SAMPLE VOLUME	PRESERVATIVE	HOLDING TIME
Calcium (Ca)	polyethylene (HDPE[2])	200 mL[3]	HNO_3 pH<2	3 days w/o pres. 6 months w/ pres.
CATION ANION BALANCE[4]	N/A Calculation	N/A Calculation	N/A Calculation	N/A Calculation
Chloride (Cl)[5]	polyethylene (HDPE[1])	100 mL[2]	4±2°C	28 days
Conductivity (SEC)[5]	polyethylene (HDPE[1])	100 mL[2]	4±2°C	28 days
Magnesium (Mg)	polyethylene (HDPE[1])	200 mL[2]	HNO_3 pH<2	3 days w/o pres. 6 months w/ pres.
Nitrate (NO3)[5]	polyethylene (HDPE[1])	100 mL[2]	none HSO_4; pH<2	48 hours at 4° C 28 days
pH (Laboratory)	polyethylene (HDPE[1])	30 mL[2]	none	48 hours at 4° C
Potassium (K)	polyethylene (HDPE[1])	200 mL[2]	HNO_3 pH<2	3 days w/o pres. 6 months w/ pres.
Sodium (Na)	polyethylene (HDPE[1])	200 mL[2]	HNO_3 pH<2	3 days w/o pres. 6 months w/ pres.
Sulfate (SO4)	polyethylene (HDPE[1])	100 mL[2]	4±2°C	28 days
Total Alkalinity (as CaCO3)	polyethylene (HDPE[1])	100 mL[2]	4±2°C	14 days

[1] = CCL QA Manual and SOPs
[2] = High Density Polyethylene
[3] = only one 0.5 gal (~2L) container is needed for all analyses
[4] = Cation anion balance is a calculation
[5] = Analytes in partial mineral panel, one pint (~500 mL) container is need for analyses

APPENDICES

APPENDIX A

GLOBAL POSITIONING SYSTEM (GPS) TRAINING

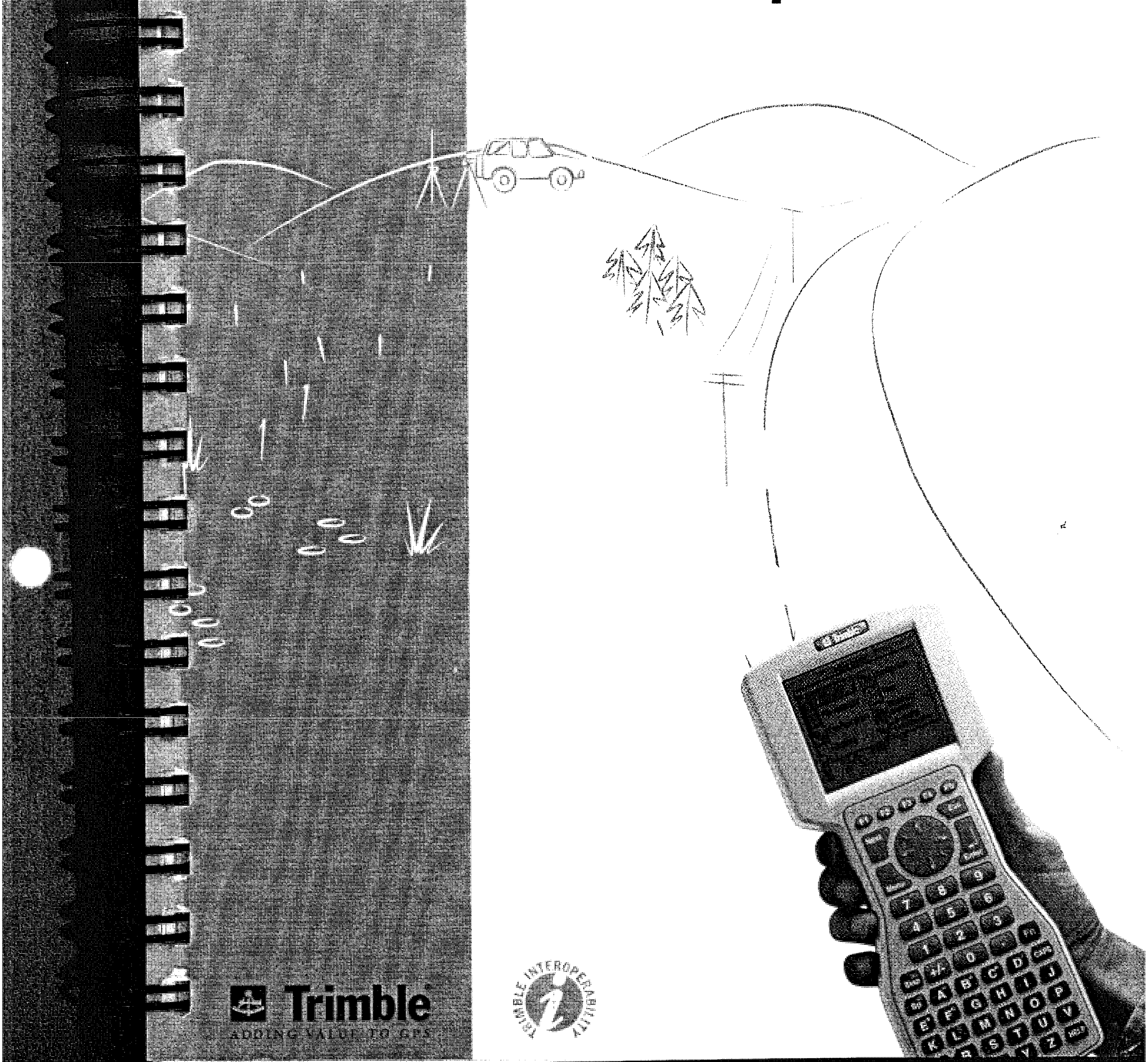
Geographic Positioning System (GPS) Training Record

Name of Trainee
Name of Trainer
Date of Training

	Satisfactory Completion / Understanding
Verification of access to Pathfinder Office software	
Preparation of data dictionary	
Set-up of equipment	
Trimble® TSC1 Asset Surveyor[1]	
Trimble® Pro XR Receiver[1]	
Connector cables	
Batteries (Asset Surveyor and Receiver)	
Confirmation of communication between Asset Surveyor and Receiver	
Acquiring satellites	
Setting up and checking critical settings	
-logging intervals	
-PDOP mask[2]	
Proper packing and unpacking of equipment	
Transferring data files from Asset Surveyor to the computer	

[1] The Agency uses Trimble® products, the GPS industry standard.
[2] PDOP = Position Dilution Of Precision

TSC1 Asset Surveyor
Operation Manual



TSC1 Asset Surveyor

Operation Manual

Part Number 34182-05-ENG

Version 5.00

October 1999

Revision A

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1 Quick Setup

The instructions in this chapter are a simplified version of the various steps found in Chapters 4, 5, and 6 of this manual. The purpose of the simplified version is to provide quick setup guides with reasonable default values that can be distributed to field crews to ensure proper setup of rover or base station receivers.

Data is logged to the TSC1 with the Asset Surveyor software. For full details on configuration and data collection, refer to the *TSC1 Asset Surveyor Software User Guide*.

Note – The steps outlined in this chapter do not include steps required to collect data using carrier phase information. For instructions on how to collect high accuracy features, see Chapter 7, Carrier Phase Data Collection.

1.1 Before Leaving the Office

1. Install the Pathfinder Office software on your office computer (refer to the *Pathfinder Office Getting Started Guide*).
2. Using the Pathfinder Office software, prepare any data files or data dictionaries you require, and transfer them to the TSC1. If you want to update GPS or attribute information on features stored in a GIS, import the data files and data dictionary into Pathfinder Office and then transfer them to the TSC1. You may also want to transfer any waypoint and coordinate system files to the datalogger.

3. Check that you have all the required equipment, and that it is operational. Set up and connect your GPS system (the appendix for your GPS receiver lists the equipment and shows you how to connect it).
4. If the GPS receiver has an On/Off switch, turn it on (the Series 4000, GPS Total Station 4700, GPS Total Station 4800, Site Surveyor 4400 and 4600LS receivers have an On/Off switch).

   Start the Asset Surveyor software to check that it and the GPS receiver are communicating correctly. If communication is established, the GPS status line appears. If communication fails, an error message pops up on the screen.
5. Check all critical settings in the Asset Surveyor software.

   You should also check non-critical and display settings, especially if the system has been used by someone else recently. For details of how to configure Asset Surveyor, refer to the *TSC1 Asset Surveyor Software User Guide*.
6. Turn everything off and pack it into carrying cases if you have to travel a significant distance to the survey site. Pack spare sets of batteries if you expect to operate the receiver for any length of time.

1.2 In the Field

1. Travel to the survey site, remembering to carry all the required equipment with you.
2. Reassemble the system.
3. If the GPS receiver has an On/Off switch, turn it on. Then start the Asset Surveyor software, if it is not already on.

   Wait until the GPS receiver acquires enough satellites to start computing GPS positions, before beginning to work. The number of satellites being tracked displays on the status line.

You should now change some of the configuration settings as follows:

Main menu

1.	*Configuration*	Highlight *Configuration* then press the [Enter] key

Configuration menu

2.	*GPS rover options*	Press [Enter]
3.	*Logging options*	Press [Enter]

Logging options screen

4.	*Point feature*	Synchronized with the base station
5.	*Line/area*	Synchronized with the base station
6.	*Not in feature*	Synchronized with the base station
7.	*Minimum positions*	3
8.	*Allow GPS update*	'Warn first'
9.	*Warning distance*	'Any'
10.	To accept	Press [Enter]

Position filters screen

11.	*Position mode*	'Manual 3D' or 'Overdet. 3D' depending on canopy density
12.	*PDOP mask*	4 or 6 (depending on receiver)
13.	To accept	Press [Enter]

4. Create a new data file, associating the correct data dictionary with it. Alternatively, re-open an existing data file.
5. Begin collecting data. Collect, review and update all the features necessary.
6. Close the data file.
7. Disconnect and repack the components of the system. Remember to turn off the GPS receiver, if it has an On/Off switch. Return to your office.

1.3 Back in the Office

1. Transfer the data files from the TSC1 to the PC using the Pathfinder Office software.
2. Use the Pathfinder Office software for differential correction, plotting, and exporting the data file(s) to a GIS.
3. Recharge the TSC1 datalogger and GPS receiver batteries.

1.4 Rover Configuration

Use the following procedure to set up your system in a rover configuration.

From the *Utilities* menu, select *Factory defaults*. This resets the Asset Surveyor software to its default configuration and then restarts the datalogger.

Antenna options screen

14. *Height*	Height to antenna's phase center
15. *Measure*	'Vertical'
16. *Type*	For a list of antenna types, see the *TSC1 Asset Surveyor Software User Guide*
17. *Confirm*	Select 'Per feature', 'Per file', or 'Never'
18. To accept	Press Enter

GPS rover options menu

19. To return to the *Configuration* menu	Press Esc

Configuration menu

20. *Communication options*	Press Enter
21. *Real-time input options*	Press Enter

Real-time input options screen

22. RTCM age limit	5 or 10 (depending on your radio)
23. To accept	Press Enter
24. To return to the *Configuration* menu	Press Esc

Configuration menu

25. To exit the *Configuration* menu	Press Esc

1.4.1 Data Collection

Use the following procedure to set up your system for rover data collection.

Main menu

1. Select *Data collection* and press [Enter]

Data collection menu

2.	Create a data file -or- Open an existing data file	Select *Create new file*: Press [Enter] and then press [Enter] -or- Select *Open existing file.* Press [Enter] Select an existing file to append to or update, and press [Enter]
3.	To exit *Data collection*	Press [Esc] and press [Yes] to confirm exit

1.5 Base Station Configuration

Use the following procedure to set up your system in a base station configuration.

Main menu

1.	*Configuration*	Highlight *Configuration* then press the [Enter] key

Configuration menu

2.	*GPS base station options*	Press [Enter]
3.	*Logging options*	Press [Enter]

Logging options screen

4.	*Measurements*	One to five seconds (depending on rover interval and free space)
5.	To accept	Press Enter
6.	To return to the *Configuration* menu	Press Esc

Configuration menu

7.	To exit the *Configuration* menu	Press Esc

1.5.1 Base Station Data Collection

Use the following procedure to set up your system for base station data collection.

Main menu

1.	*Data collection*	Press Enter

Data collection menu

2.	*Create base file*	Press Enter

Create File screen

3.	Create file	Press Enter

Antenna options screen

4.	*Height*	Height to antenna's phase center
5.	*Measure*	'Vertical'
6.	*Type*	For a list of antenna types, see the *TSC1 Asset Surveyor Software User Guide*
7.	To accept	Press Enter

Reference Position **screen**

8.	Enter reference position	Type lat/lon (or north/east) and altitude, and press [Enter]
	-or-	-or-
	Use an existing waypoint	Press [WayPt], select the waypoint and press [Enter]
	-or-	-or-
	Use an approximate position	Press [Here] and press [Enter]
	-or-	-or-
	Leave as is and set in the Pathfinder Office software	Press [Enter]

Base Station **screen**

9.	To exit *Base station*	Press [Enter] and press [Yes] to confirm exit.

Key Symbols

The Asset Surveyor software uses both *hard* (that is, physical) keys on a keypad and *soft* (that is, visual) keys on the datalogger's screen.

Hard (physical) keys on the TSC1 keypad are indicated as follows:

[Enter], [◄], [F1], and so on.

Softkeys on the TSC1 screen are indicated as follows:

[Create], [Del], [Edit], and so on.

A softkey is activated by pressing the corresponding function key ([F1]...[F5]) on the TSC1 keypad.

Warnings, Cautions, Notes, and Tips

Warnings, cautions, notes, and tips draw attention to important information, and indicate its nature and purpose.

Warning – Warnings alert you to situations that could cause personal injury or unrecoverable data loss.

Caution – Cautions alert you to situations that could cause hardware damage or software error.

Note – Notes give additional significant information about the subject to increase your knowledge, or guide your actions.

Tip – Tips indicate a shortcut or other time- or labor-saving hint that can help you make better use of the product.

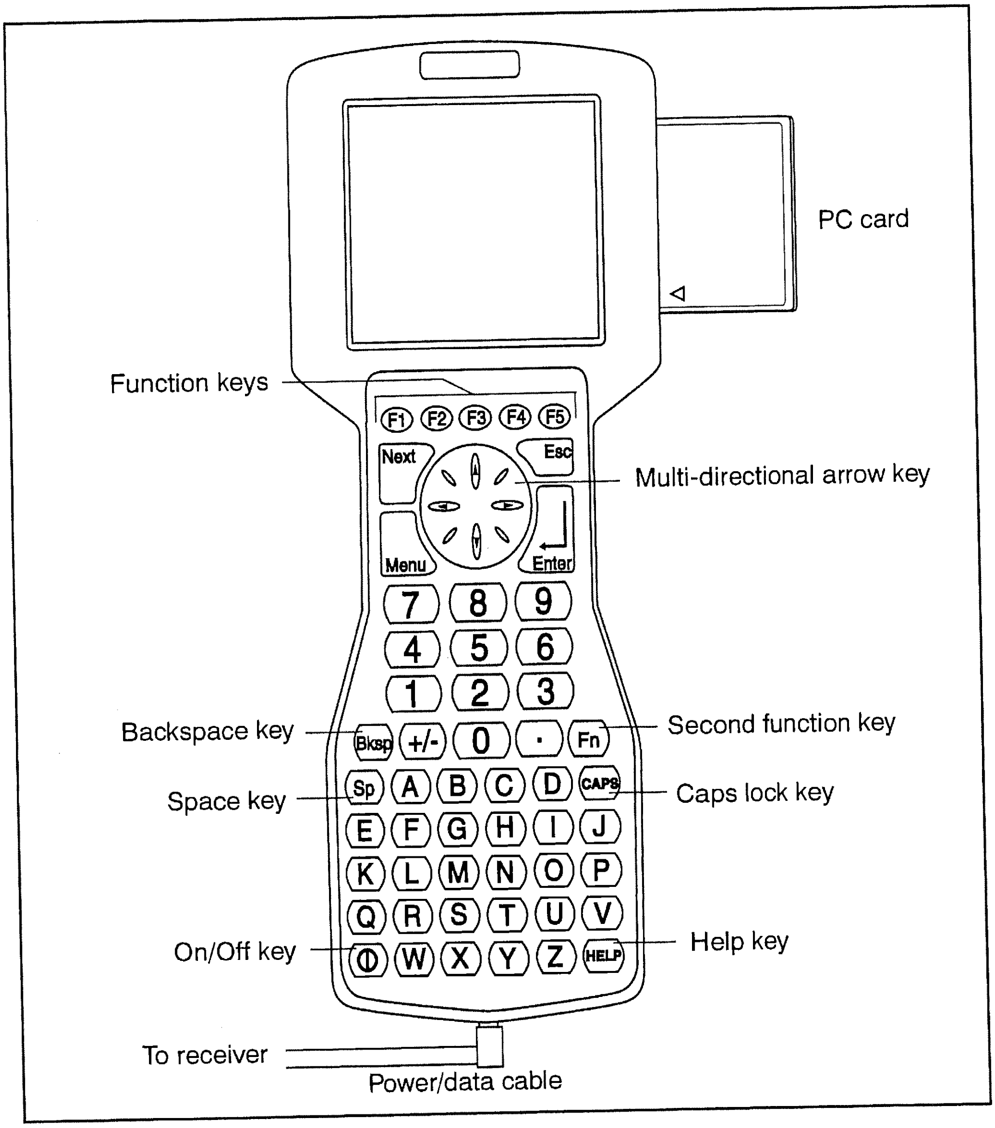


Figure 3-1 Front View of the TSC1 Datalogger

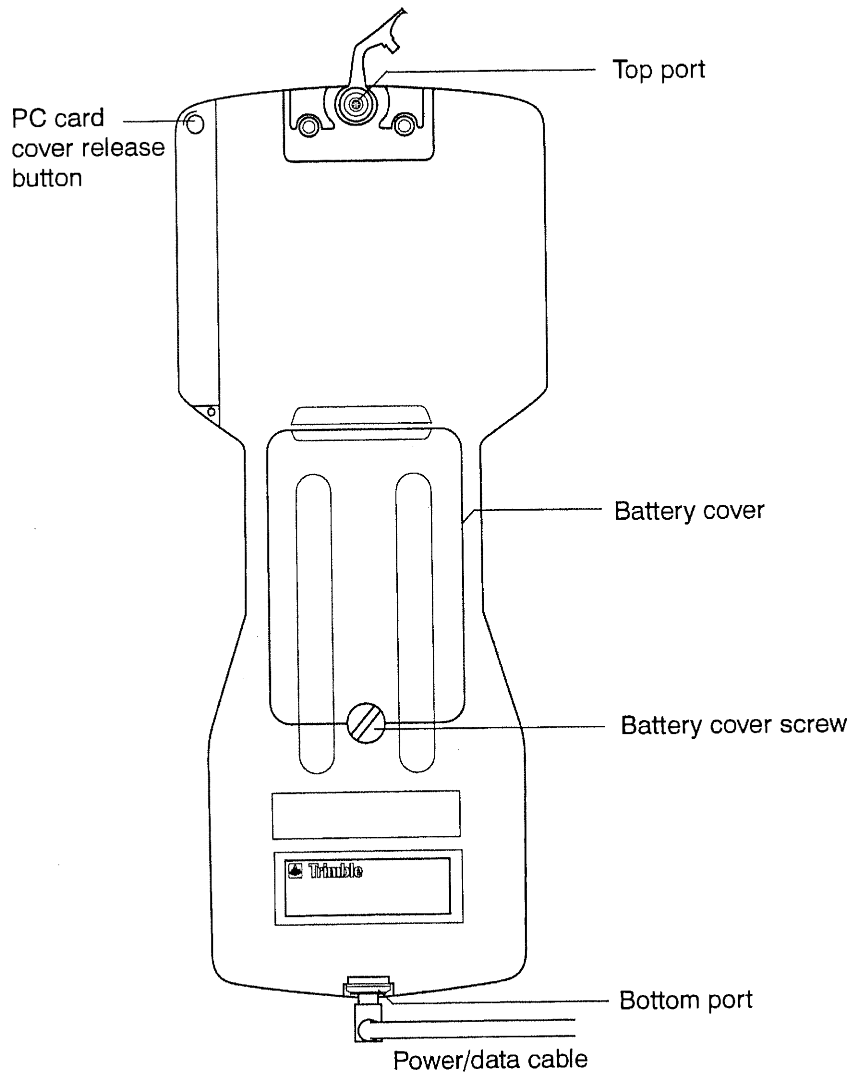


Figure 3-2 Back View of the TSC1 Datalogger

3.2 Turning the TSC1 Datalogger On and Off

To turn on the TSC1 datalogger, make sure that power is supplied (see Power Sources, page 3-11). Then press the green on/off key marked [⏻].

To turn off the TSC1, hold down [⏻] for one second.

Tip – For the location of the [⏻] key and other keys on the TSC1 datalogger's keypad, refer to Figure 3-1.

3.2.1 Hard Keys

Hard keys are the physical keys on the TSC1 keypad, such as [1], [A], [Enter], [►], [▼], and [Esc]. Use these keys to enter data and to access different screens.

3.2.2 Alternate Keys

Alternate keys give some hard keys a second function. Some of the second functions are displayed on the hard keys in small yellow lettering. To use a second function, press the [Fn] hard key and then press the alternate hard key.

Table 3-1 shows some of the functions that you can access using alternate keys.

Table 3-1 Useful Second Functions

Keys	Function
[Fn] [▼]	Page down
[Fn] [▲]	Page up
[Fn] [◄]	Home
[Fn] [►]	End
[Fn] [Next]	Previous screen
[Fn] [E]	Contrast up
[Fn] [F]	Contrast down

3.2.3 Softkeys

Softkeys are displayed on the bottom line of the TSC1 screen. A softkey corresponds to the adjacent hard key: F1, F2, F3, F4, F5. Press the hard key to activate the softkey on the screen. To activate the Pause softkey, for example, press F1. See Figure 3-3.

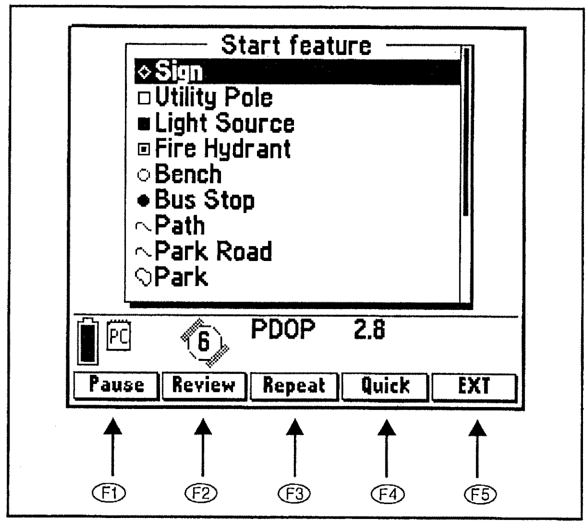


Figure 3-3 How Function Keys Correspond to Softkeys

Softkeys relate to particular forms or fields and only appear when these forms or fields are accessed. For example, the Seg softkey only appears when a line feature is opened for data collection, as this functionality applies to line features only.

3.2.4 Menu Key

To return to the *Main menu* at any time, press the Menu hard key. Use this key in conjunction with the Next key to move around the Asset Surveyor screens quickly.

3.2.5 Next Key

To simplify the task of moving around menus, the Next hard key offers quick access to open screens (windows).

3.2.6 Help Key

Press the HELP hard key at any time to obtain further information about a topic. When you press it, the *Help* menu appears. To exit *Help*, press Esc from the *Help* menu.

3.3 Screen

The TSC1 has an LCD screen. This screen responds to heat, and prolonged exposure to full sunlight can cause it to darken. If the screen does darken, turn it away from direct sunlight until it returns to normal.

Caution – Repeated exposure to direct sunlight can cause the screen to degrade.

3.3.1 Contrast

To increase the screen contrast, press Fn E.

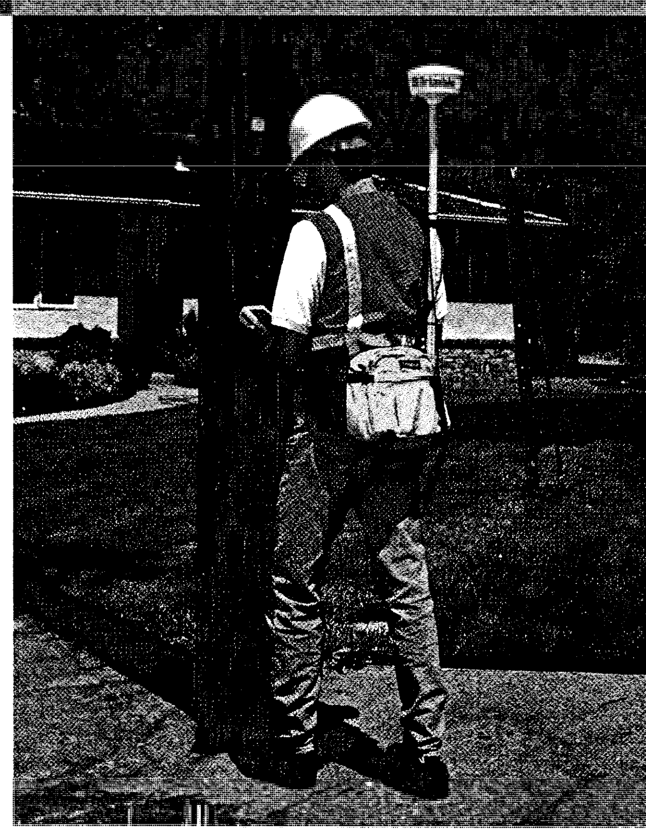
To decrease the screen contrast, press Fn F.

3.3.2 Backlight

To toggle the screen backlight on and off, press Fn L.

Pro XR/XRS

Receiver Manual



Trimble

Pro XR/XRS

Receiver Manual

Part Number 31172-20-ENG

Revision A

May 1998

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Mapping and GIS Systems Division
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www.trimble.com

4 Pro XR/XRS System Equipment

This chapter provides details of the equipment associated with the Pro XR and Pro XRS receivers and shows how to assemble the equipment.

4.1 Pro XR Receiver Front Panel

The Pro XR receiver, shown in Figure 4-1, is mounted in a weatherproof housing.

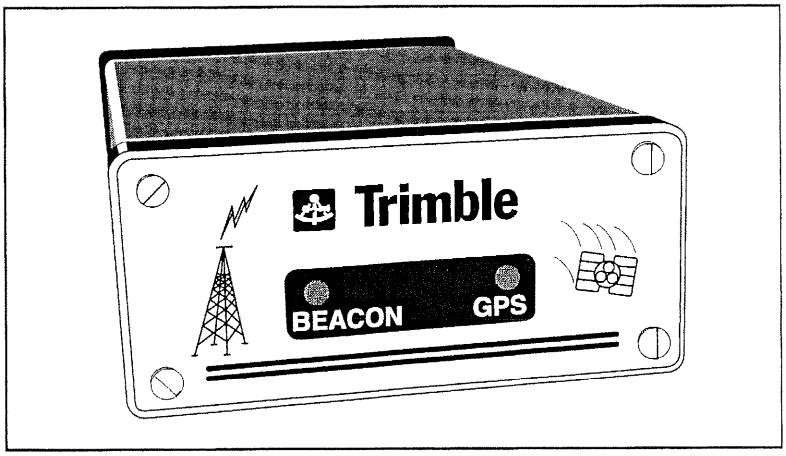


Figure 4-1 Pro XR Receiver Front Panel

4.2.1 Pro XR Status Lights

The two status lights on the front panel of the Pro XR receiver provide the status information listed in Table 4-1.

Table 4-1 Pro XR Status Lights

	GPS	Beacon
OFF	Unit not powered up	Unit not powered up or beacon function is disabled
FAST FLASH	Searching for satellites	Searching for MSK signals
SLOW FLASH	Found one or more satellites. Not enough for a position fix.	Found MSK signal. RTCM data has not been sent to GPS receiver.
ON	Performing position fixes	Good RTCM data is being provided to the GPS receiver

4.3 Back Panel

The Pro XR and Pro XRS receivers have two serial communications ports (RS232) and an antenna cable port. The serial communications ports, shown in Figure 4-3, are 12-pin(m) bulkhead connectors located on the back panel of the Pro XR and Pro XRS receivers.

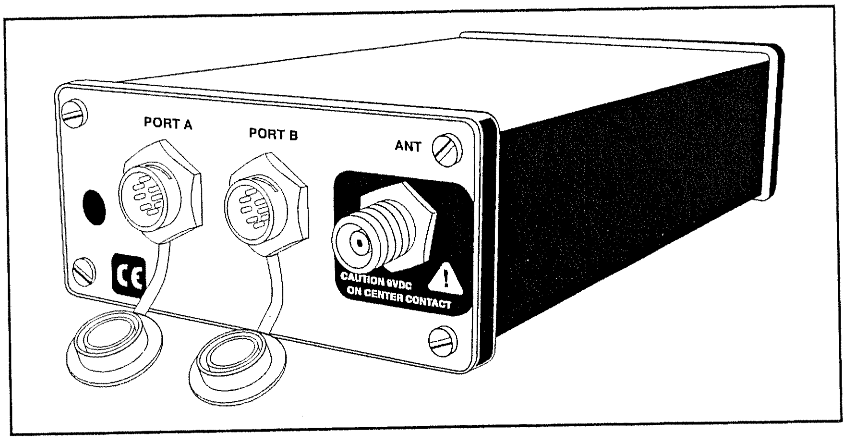


Figure 4-3 Pro XR/XRS Receiver Back Panel

4.3.1 Port A

Port A offers RS232 communication standards. It is designed for NMEA-0183 output and RTCM input.

4.3.2 Port B

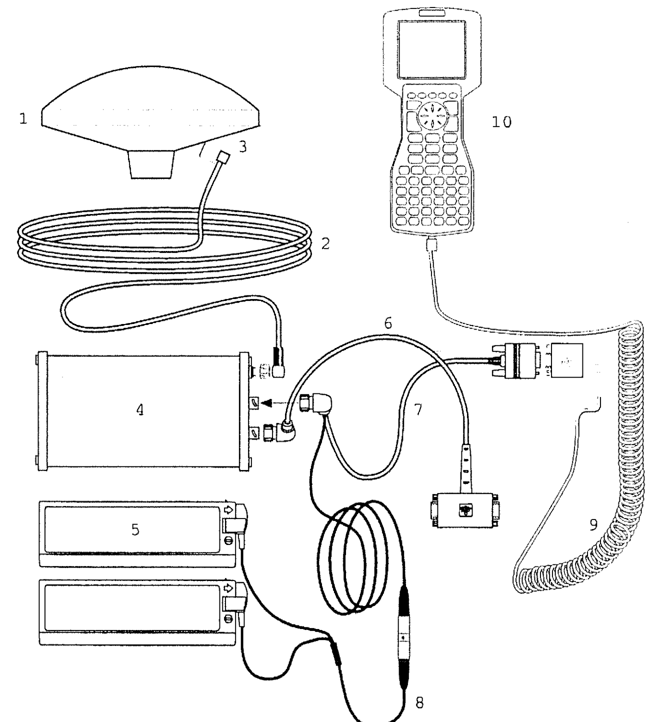
Port B also offers RS232 communication standards. It is designed for two-way data flow, external sensor input and power.

4.3.3 Antenna Port

The antenna connector is a TNC(f) connector located on the far right on the back panel of the Pro XR or Pro XRS receiver.

4.4 GPS Pro XR Cabling

To use the TSC1 handheld with a GPS Pro XR receiver, connect the system as shown in Figure 4-4.



1	P/N 16741-00	Compact Dome Antenna
2	P/N 22628	Antenna Cable
3	P/N 31180	Antenna Cable Adapter
4	P/N 29654-11	12-channel Pro XR receiver
5	P/N 17466	Camcorder Batteries
6	P/N 30232-00	NMEA/RTCM Cable
7	P/N 30231-00	Data/Power Cable
8	P/N 24333	Dual Battery Cable
9	P/N 32287-00	TSC1 Data/ESP Cable
10	P/N 29673-50	TSC1 Handheld

Figure 4-4 GPS Pro XR / TSC1 Connection Diagram

4.7 Pro XR/XRS System Hip Pack

The Pro XR and Pro XRS systems come equipped with an ergonomic hip pack carrying system, see Figure 4-18. The receiver, batteries and antenna are carried in the field using this hip pack/strapping system.

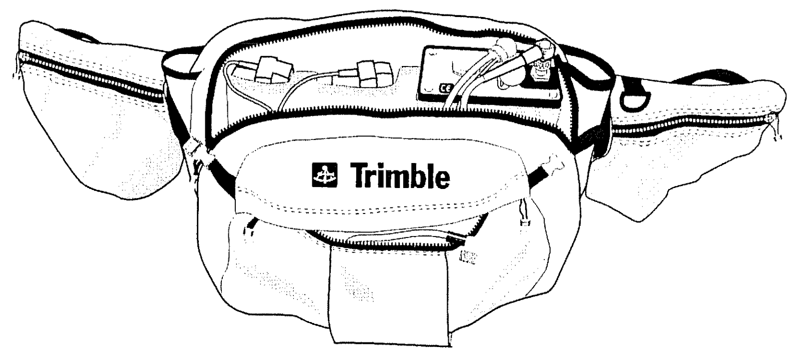


Figure 4-18 Pro XR/XRS System Hip Pack

4.7.1 Pro XR/XRS Hip Pack Contents

The Pro XR and Pro XRS systems are packed so that they are almost ready for use. The items not included in the hip pack are three 1-foot antenna poles, one 6-inch antenna pole and the data collector cable (P/N 30233-00 for TDC1, P/N 30234 for TDC2, or P/N 30236 for Field Computer/MC-V). These are located inside the shipping case.

The large interior of the hip pack contains: the Pro XR or Pro XRS receiver, two camcorder batteries, the power/data cable, and the camcorder power cable. All of these are set up inside the pack and ready for use. The exterior pocket of the hip pack contains a 3-meter antenna cable attached to the receiver and routed through a passage between the large interior pocket and exterior pocket. Both the data collector cable and antenna are routed out of the exterior pocket through the double zipper.

To route the data collector cable:

1. Locate the data collector cable and connect it to the data power cable, DE-9 connector labeled TO RECEIVER.
2. Once connected, feed the coiled cable through the passage and into the exterior pocket.

4.7.2 Wearing and Adjusting the Hip Pack

The Pro XR/XRS hip pack, once adjusted to suit, is comfortable and easy to use. See Figure 4-19.

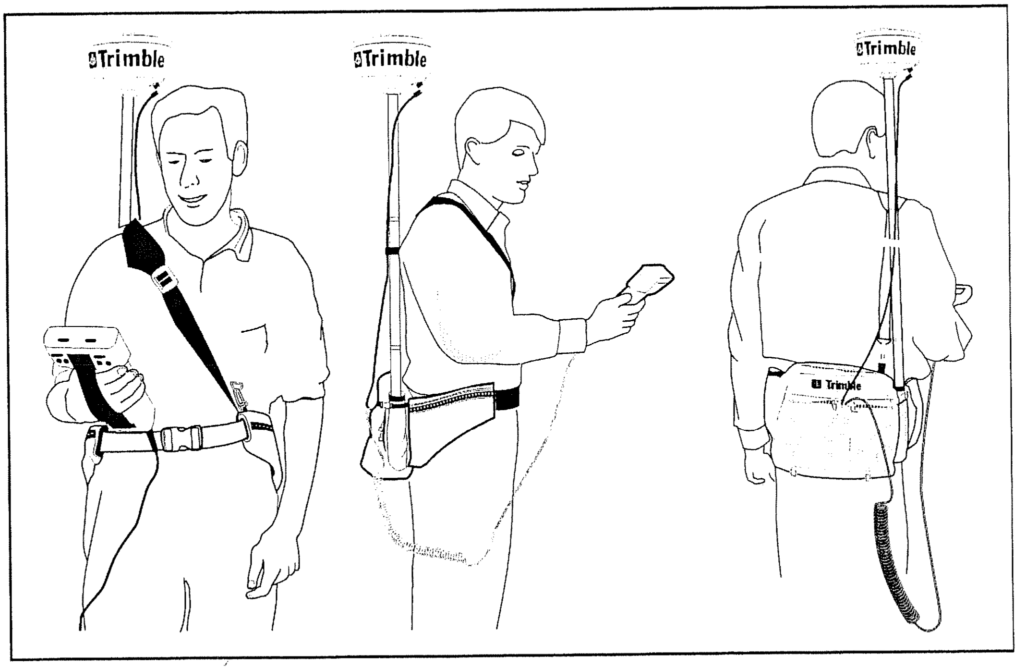


Figure 4-19 View of Hip Pack Setup

Antenna

When wearing the hip pack, the antenna height should be 3-4 inches above your head. The number of antenna pole sections required varies depending on your height. For example, if you are 5'5" tall, you may need two 1-foot and one 6-inch pole sections. If you are 6'2" tall, you may need three 1-foot poles. Try out different pole heights.

To set up the antenna with the hip pack:

1. Attach the pole sections together and connect the antenna onto the top of the pole sections.
2. Attach the pole/antenna to the hip pack.
3. Choose the side of your body that you prefer the antenna to be on and slide the pole sections into the small sleeve on that side of the hip pack.

Hip Pack and Strap

To adjust the hip pack and strap:

1. Connect the strap to the rear D-ring on the side of the pack on which the antenna is located.
2. Connect the other end of the strap to the D-ring on the belt on the opposite of the bag.
3. Slide the antenna pole through the velcro connection on the strap.
4. Put the strap over your head and across your opposite shoulder.

   At this point, the shoulder strap should lead naturally from the antenna pole across your chest to the belt.
5. Buckle the hip pack around your waist/hip area so that the belt buckle is centered in the middle of your body.

   The pack should adjust to fit close to the small of your back.

6. Adjust the front and back straps so the shoulder strap is situated squarely on your shoulder.
7. Put the pack on by slipping the strap over your head and across your body and then buckling the belt of the hip pack.

   The hip pack includes side compression straps that can be pulled towards you to hold the pack firmly and comfortably against your back.

Remove the hip pack/strap by unbuckling the belt and slipping the strap over your head.

The hip pack and strap can also double as a shoulder bag. Tuck the belt portion of the pack into the webbing material on the back of the pack and hook the strap on the large D-rings of the pack. The unit can now be carried on your shoulder instead of around your waist.

The pack has extra room in the interior and exterior pockets for additional items you may need in the field. The hip pack also includes straps on the bottom of the pack to secure an extra sweater or coat while in the field.

4.8 Optional Range Poles and Tripods

Range poles and tripods are very useful when collecting carrier phase data. The height of the antenna can be accurately measured, and the antenna can be held still easily, compared to an antenna mounted from the hip pack.

APPENDIX B

FIELD DOCUMENTATION

MONTEREY COUNTY WATER RESOURCES AGENCY - COASTAL GROUND WATER MONITORING PROGRAM June 2007

F CODE	SWID	STATUS	AQUIFER	USE	WELL NAME	METER No	PLANT No	SMPLE PT	VISIT DATE	APPT. DATE	SMPLE DATE	SMPLE TIME	SMPLER	REMARKS
886	14S/02E-24E01	ACTIVE	P400	AG	R5P1	4571R8	92205	DL						D'Arrigo Bros. R5P1. Tag #1164. Well is at corner of San Jon Rd an Hwy 183. Go twice then call Ed Mora 206-9164 or Jesse Aragon 90 9073. See photo
331	14S/02E-36E01	ACTIVE	P180	AG	BARDIN 12	0R1749	92428	faucet on booster						T & A. Bardin #12. Tag #1037. Well on Hitchcock Rd. off Blanco b office. Go twice, then call Dennis. See photo
673	14S/02E-13F01	ACTIVE	P180	AG	SAN JON B	R39873	95522	DL						Sea Mist. San Jon well B. Tag #1186. Call Chris. Three day notice. S photo
975	14S/02E-12N02	CSIP-SBI	P180	AG		92593R	91785	DL						Schneider. Domestic well. Tag #2960. Run for 30 min. to stabilize conductivity, EC = 2920 (Jul '04). Call Tim Schneider 449-0874. Tw week notice. Take EC meter, a bucket and last years results. See pho
1055	14S/02E-15A01	CSIP-SUPP	P400	AG	15A01	R69587	94951	DL			6/12/2007	9:05:00 AM		CSIP-SUPP. Well 15A1. PCA site #17. Go twice, then call Bill or Je See photo
1324	14S/02E-15C02	CSIP-SUPP	P400	AG	15C02	42542R		DL			6/12/2007	8:55:00 AM		CSIP-SUPP. Well 15C2. Tag #2838. PCA site #19. Go twice, then c Bill or Jesse. See photo
861	14S/02E-15P01	CSIP-SBA	P400	AG	MORO COJO#1 (YARD)	31535R	95209	DL						Higashi Farms. Moro Cojo #1. By house and shed. Call Peter. 2 day notice. See photo
279	14S/02E-16H01	CSIP-SBA	P400	AG	CONLEY	91R418		DL						Higashi Farms. Connely Ranch well. Tag #2856. Call Peter Odello 5 7926 or Charlie 578-7416. See photo. INACTIVE
2779	14S/02E-21E01	ABAN	P400	AG	MARINA-ARMSTRONG WELL	02384R		DL						Armstrong. Marina-Amstrong well. Tag #2962. SW of MRWPCA, sample from ball valve on pressure/flow control valve. Jack Armstro 455-1901 See photo. INACTIVE
766	14S/02E-22P02	ACTIVE	P180	AG	VIERRA#1	1843T	95485	truck fill valve						Crown Packing. Vierra #1. Tag #1095. Call Bill or Jose. Two day notice. See photo
859	14S/02E-15N01	CSIP-SBA	P400	AG	MORO COJO#2	3538R4	95037	DL						Higashi Farms. Moro Cojo #2. Big yellow truck-fill. Call Peter. 2 day notice. See photo
1282	14S/02E-24P02	ACTIVE	P400	AG	BORONDA SCHOOLHOUSE#1	93258T		DL						Crown Packing. Boronda Schoolhouse well. Tag #1099. Call Bill Sullivan 214-4650 or Jose Luis Lepe 970-6889. Well next to house/metal shed on McFadden Road, close to elem. school. Two day
22929	14S/02E-28H04	ACTIVE	PDEEP	AG	JACKS YARD									New Deep aquifer well located .54 mi W of Cooper Rd & .27 mi S of McFadden Rd on the Nissen Rch

ENVIRONMENTAL ANA' YSIS REQUEST FORM

MONTEREY COUNTY CONSOLID...ED CHEMISTRY LABORATORY
1270 NATIVIDAD ROAD, SALINAS, CALIFORNIA 93906 Phone (831) 755-4516

Shaded areas for laboratory use only

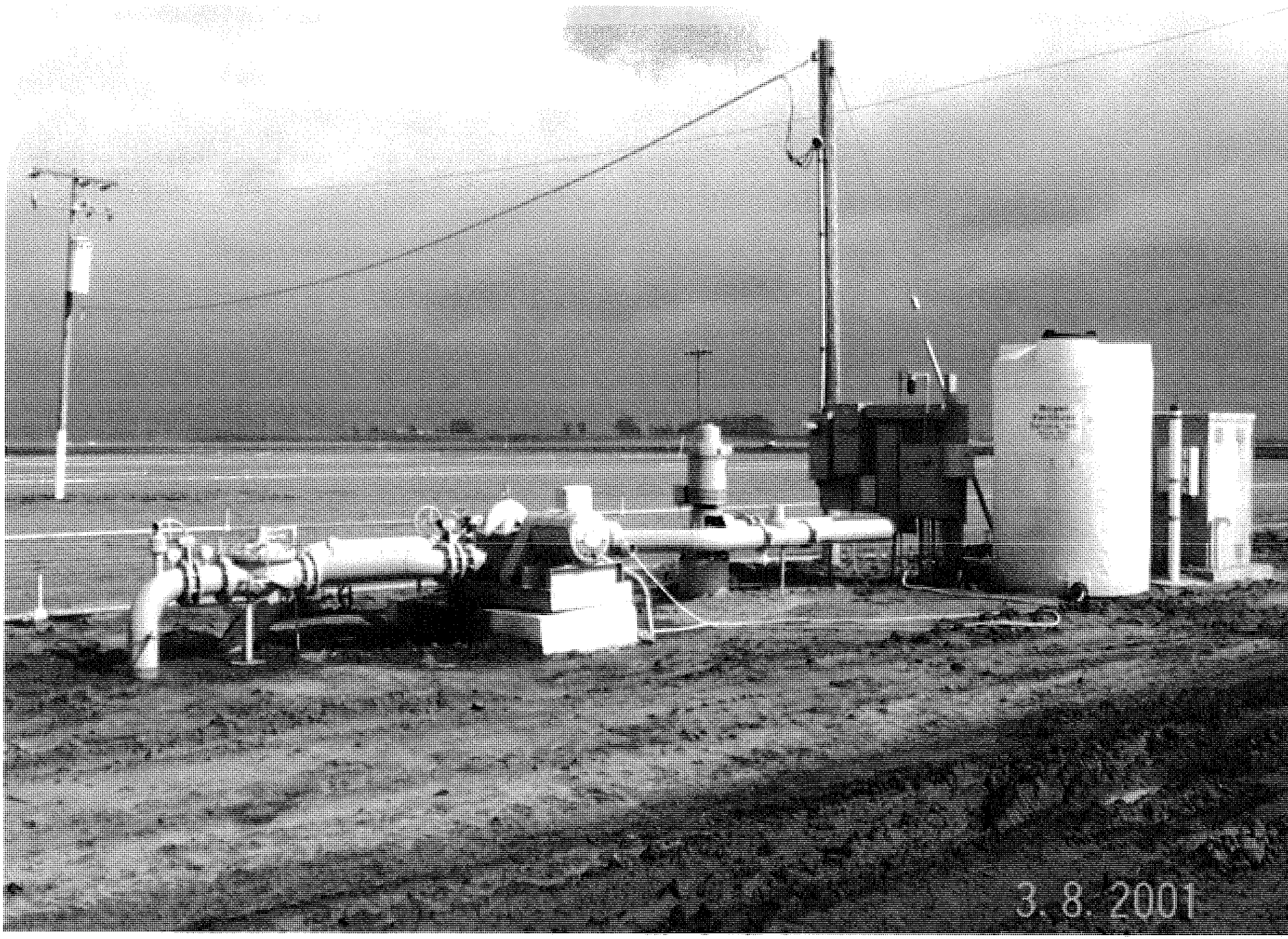
Chain of Custody:

Collected by (Print & sign):	Received by:	Date & Time:
Relinquished by:	Received for Laboratory:	Date & Time:

Client Name:		Report Attention:			ANALYSES REQUESTED								
Address:		Copy to:											
City, State, Zip:		Phone:	Fax:										
Laboratory Number	Sample ID or System #	Sample Site or Description	Collection Date & Time	Matrix(1) 1-Routine 2-Repeat 3-Replacement	No. of Containers	Coliform	MMO..... ☐ Quanti........ ☐ Low-D............ ☐	Nitrate					

(1) **D**=Drinking Water (Specify as routine, repeat or replacement) **W**=Wastewater (Specify as grab or composite) **O**=Other (identify)

[ ] Payment received with delivery	Amount: ______	Sample comments (irregularities/preservation, billing information if different than reporting):
Check: ______	Initials: ______	
Receipt #: ______	Date: ______	


3. 8. 2001


2001

15S/04E-07A01

Sampling Date: Sampler:

Sampling Time:

Comments:
Complete General Mineral Analyses

15S/04E-08M04

Sampling Date: Sampler:

Sampling Time:

Comments:
Complete General Mineral Analyses

15S/04E-15D02

Sampling Date: Sampler:

Sampling Time:

Comments:
Complete General Mineral Analyses

15S/04E-17P02

Sampling Date: Sampler:

Sampling Time:

Comments:
Complete General Mineral Analyses

15S/04E-19H03

Sampling Date: Sampler:

Sampling Time:

Comments:
Complete General Mineral Analyses

15S/04E-20B02

Sampling Date: Sampler:

Sampling Time:

Comments:
Complete General Mineral Analyses

15S/04E-26G01

Sampling Date: Sampler:

Sampling Time:

Comments:
Complete General Mineral Analyses

15S/04E-36H01

Sampling Date: Sampler:

Sampling Time:

Comments:
Complete General Mineral Analyses

APPENDIX C

REVIEW CHECKLISTS

Appendix C-1: Field Activities Review Checklist

Appendix C-2: Laboratory Data Review Checklist

Field Activities Review Checklist

Sampling Location(s): ______

Sampling Date: ______

Item	Yes	No	NA	Comment
All required information was entered into field sheets in ink, and sheets were signed and dated by the field sampler.				
Deviations from SOPs, along with any pertinent verbal approval authorizations and dates, were documented on the field sheets.				
Samples were collected at the correct sites.				
The correct number of samples for each type of analysis and the correct volume was collected (0.5 gal/ ~2L for complete mineral panel OR one pint/ ~0.5L for partial mineral panel).				
Acceptable sample containers, appropriate for the intended analysis, were used.				
Field blanks were collected, and at the correct frequency (one every 25 samples).				
Field duplicates were collected, and at the correct frequency (one every 25 samples).				
Samples were packed with double-bagged ice and transported at the proper temperature (4±2°C).				
Chain of custody (COC) documents were completed properly.				
Sample holding times were not exceeded during field operations. See Table 6 (QAPP).				

Reviewer's Name (print): ______

Reviewer's Signature: ______

Reviewer's Title: ______

Date of Review: ______

Laboratory Data Review Checklist

Sampling Location(s):

Sampling Date:

Item	Yes	No	NA	Comment
Samples arrived at the laboratory at the proper temperature (4±2°C).				
All requested analyses were performed and were documented in the analytical report.				
Analyses were performed according to the methods specified in the approved QA Project Plan.				
Holding times for extraction and analysis were not exceeded. See Table 6 (QAPP).				
Field Blanks results were below MDLs and were analyzed at a frequency of one every 25 samples.				
Field Duplicate results were ≤ 25% RPD and were analyzed at a frequency of one every 25 samples.				
Method detection limits were included in the report.				
A narrative summarizing the analyses and describing any analysis problems was included in the data report.				
Data qualifiers and flags were explained in the data report.				
Initial calibration data were within laboratory SOP defined acceptance criteria ($r^2 \geq 0.995$) for all analyses.				
Method blanks were performed at 3 per analytical batch, and were below MDL.				
Laboratory Control Sample (LCS) data were included for all analyses for every analytical batch.				
Laboratory Control Sample Results were within 80-120% recovery.				

Item	Yes	No	NA	Comment
Analytical Duplicate data were included for all analyses for every analytical batch.				
Analytical Duplicate results were < 25% RPD.				
Matrix spike data were included for all pertinent analyses for every analytical batch, and recoveries were within 75-125%.				
Matrix spike additions were at 3-10x the native.				
Matrix spike duplicates were ≤ 25% RPD.				
Continuing calibration data were within QAPP defined acceptance criteria (80-120% of initial slope) for all analyses.				

Reviewer's Name (print): ______________________________

Reviewer's Signature: ______________________________

Reviewer's Title: ______________________________

Date of Review: ______________________________

APPENDIX D

MONTEREY COUNTY CONSOLIDATED CHEMISTRY LABORATORY

QA MANUAL AND STANDARD OPERATING PROCEDURES

TABLE OF CONTENTS

ORGANIZATION AND RESPONSIBILITY

On October 11, 1988, the Monterey County Board of Supervisors, in Resolution No. 88-508, authorized the Director of the County Health Department and the General Manager of Monterey County Flood Control and Water Conservation District (MCFC&WCD) to consolidate laboratory services for their respective programs into one facility. A Laboratory Steering Committee, comprised of representatives from both agencies, was established for the purpose of providing the planning, operation, and future development of the Consolidated Environmental Laboratory.

Each year the Steering Committee develops a Memorandum of Agreement (MOA) that describes and confirms the services to be provided by the Health Department to the Water Resources Agency (formerly the Flood Control and Water Conservation District) and defines the responsibilities of each party. In addition to providing laboratory support for the Health Department and the Water Resources Agency, the Consolidated Chemistry Laboratory provides analytical services to the Monterey Regional Water Pollution Control District, the County Department of Public Works and numerous water supply systems and wastewater treatment facilities.

The Consolidated Environmental Laboratory is accredited by the State Department of to perform tests in the following fields: 1) microbiology of drinking water and waste water; 2) inorganic chemistry and physical properties of drinking water; 3) analysis of toxic chemical elements in drinking water; 4) wastewater inorganic chemistry, nutrients and demand; and 5) toxic chemical elements in wastewater. A list of analyses and methods used in the laboratory is included in Appendix A.

The following is a brief description of the staff support for the Consolidated Chemistry Laboratory:

1. Director - Plans, organizes and controls laboratory operations. Coordinates laboratory interactions with other programs in the Health Department. Administers laboratory budget, billing and purchasing. Develops laboratory policy and procedures and supervises staff.

2. Public Health Chemist – Principal analyst. Performs complex organic and inorganic chemical analysis, evaluates and implements laboratory methods, develops and maintains quality assurance, reports results and maintains records, purchases equipment and supplies, provides technical consultation to Environmental Health and Water Resources Agency. Trains analysts and documents competency

3. Water Quality Specialist- Performs broad range of professional scientific work related to water quality and environmental issues; is proficient in

performing water quality analyses and managing the laboratory water quality database. Interpret and explain regulatory guidelines to clients.

4. Public Health Microbiologists - Assist Public Health Chemist in performing microbiological analyses and performing quality control.

5. Laboratory Assistant - Prepares culture media and reagents, assists in the processing of specimens, performs low to moderately complex environmental analyses and clinical analyses where interpretation or medical judgement is not required.

5. Laboratory Helper - Washes and sterilizes glassware and supplies. Prepares and labels mailing containers and specimen collection kits. Accession laboratory specimens. Sterilizes and disposes infectious waste. Maintains stockroom.

6. Typist-Clerk II - Enters clients and laboratory results into computer. Prints reports/forms. Prepares billing statements; receives and accounts for payments. Distributes laboratory results, and maintains laboratory files.

QUALITY ASSURANCE OJECTIVES FOR MEASUREMENT OF DATA

Quality Assurance (QA) includes all aspects of laboratory operation that affect the accuracy and reliability of sample test results. In addition to quality control of the analytical test process, quality assurance practices include: 1) proper sample collection, receiving and holding, 2) proper maintenance of equipment, 3) accurate data reduction, validation and reporting; and, 4) periodic performance and systems audits.

CUSTODY, HOLDING AND DISPOSAL OF SAMPLES

Quality assurance includes proper labeling of samples, proper completion of the chain of custody/analysis request form, proper collection, preservation and storage of samples, proper accessioning of samples, and proper disposal of the sample.

1) Sample Collection/Labeling. Sample collection is a coordinated effort between the client and the laboratory. The laboratory will provide clients with appropriate sample containers and sample collection/preservation instructions. The laboratory will also request duplicates and blanks according to client's sample plan requirements. All samples submitted for testing should be appropriately labeled. Sample containers provided by our laboratory have a suitable label which should be filled out at the time of sampling by the sample collector. The following information must be provided with all samples:

   a) Sample identification - submitters identification of sample (e.g. well number)

   b) Location - an address or brief description of the place the sample was taken.

   c) Time and date taken.

   d) Name of sample collector.

   e) Any preservatives

2) Chain of Custody/Analysis Request Form. A Chain of Custody/Analysis Request form should accompany all samples (see Appendix B). The Chain of Custody/Analysis Request form must include the following information: submitter name and address; sample identification; location of sample collection; date & time of collection; sample type; analysis to be performed; signatures of persons involved in the collection and chain of possession; and inclusive dates of possession.

3) Sample Receiving. Laboratory personnel receiving samples should assure that samples are properly collected, labeled, and the Custody/Analysis Request form has been completed:

   a) The laboratory assistant receiving the specimen must sign and date the Custody/Analysis Request form. Make sure that any special requests made by the client are recorded under the comments section of the form

   b) Assign each sample a unique laboratory identification number. Place preprinted lab number on analysis request form and sample container. When a sample is collected in multiple containers for different analyses, each container should receive the same laboratory number. (Exception: sample containers for analytes requiring a rapid turnaround time (e.g. coliforms) may receive separate number to expedite reporting).

c) Check that the samples meet the criteria described in Table 1006:I Summary of Special Sampling or Handling Requirements in 18th ed. of *Standard Methods for the Examination of Water and Wastewater* (Appendix C)

   i) Samples should be collected in a suitable container; samples collected in bottles of unknown origin or questionable cleanliness should be brought to the attention of the Water Quality Specialist or the Public Health Chemist.

   ii) Samples should be adequately labeled

   iii) Samples should be checked for proper preservative, holding time, and holding temperature.

   iv) Samples should be adequately sealed. Notify public health chemist if there is evidence of leakage. Verify that adequate sample volume exists to perform requested analysis.

d) NOTE: Samples that are not properly identified or are otherwise unsuitable for testing (e.g. improperly preserved or exceeding holding/ transport time) are recorded on the "Sample Invalidation Log" and the Water Quality Specialist or Public Health Chemist notifies the client. Samples not meeting collection/preservation criteria may be tested only if resampling is impossible; results from such samples must be qualified on the laboratory report by comments describing sample deficiency.

4) When the sample meets criteria for acceptance by the laboratory, required preservatives are added immediately and the sample is stored under conditions specified by the analytical method to be used. For samples requiring thermal preservation, a laboratory refrigerator and freezer is available. The temperature is maintained at 4 degrees and below -10^{o}C respectively. Temperatures are monitored each day.

5) Chain of Custody/Analysis Request forms are given to the clerk to enter into a password protected computer laboratory information management system. Refer to "Water Sample Entry" in Clerical Manual for instructions on sample log-in.

6) Disposal of samples: Upon completion of all analyses, any remaining

sample will be stored for at least one month prior to disposal. Chain-of-Custody form, worksheets and lab reports are retained for three years. NOTE: Longer retention of samples or data may be required when legal action is probable. The samples and any associated extracts or digests are disposed of following recommendations found in the book, *Prudent Practices for Disposal of Chemicals from Laboratories*, National Academy Press, Washington, D.C. 1983.

CALIBRATION PROCEDURES AND FREQUENCY

Calibration is the process for determining the correctness of the assigned values of the physical standards used or the scales of the measuring instruments. Calibration accuracy is critically dependent on the reliability of the standards used for the required comparisons. Only the highest quality chemicals are used to provide necessary standard solutions, and due care is exercised in their preparation. The concentrations of the calibration standards bracket the expected concentration of the analyte in the samples. No data is reported beyond the range of calibration of the methodology. The calibration data, when plotted graphically, is referred to as a calibration curve. The calibration must be done under the same instrumental and chemical conditions as those that will exist during the measurement process. The frequency of calibration depends on the accuracy requirements of the investigation and the stability of the instrument used for the measurements:

At a minimum, three different dilutions of the standard will be measured when an analysis is initiated. Correlation coefficient must be > 0.995. Reportable analytical results are those within the range of the standard dilutions used. Do not report values above the highest standard. The lowest reportable value is the Method Detection Limit (MDL), providing that the lowest calibration standard is less than 10 times the MDL.

1) Atomic Absorption Spectrophotometers - Two approaches are used to calibrate atomic absorption spectrophotometers. These methods are direct comparison and standard additions.

   a) Direct comparison is the simple approach, and can be used with many instruments to give a direct readout of the concentration of an element in an unknown sample. To obtain good precision (e.g., 1-2% coefficient of variation), the absorbance levels measured must be about 0.1 to 0.6 units. Standard and sample solutions should be similar in bulk matrix constituents, particularly acid and salt content. Interference suppressants are used in all solutions when required. A number of standards (usually three to five in increasing concentration) as well as a blank, are prepared to cover the concentration range. A volume of type II reagent water with the same amounts of acids as the samples and standards) will be used for calibration blank. These solutions are run in absorbance to check linearity of the calibration curve.

   b) The method of standard additions is used when samples contains severe matrix interference. In this case it is possible to add small amounts of conventional standard solutions, in increasing amounts, to aliquots of each sample. A calibration graph can then be constructed. This method will often be used in work with the graphite furnace.

2) UV-VIS Spectrophotometer - The calibration procedure for the UV-VIS spectrophotometer is similar to that for the A.A. spectrophotometers. An integration interval is not required as the signal is very stable. It is important to use blanks and allow at least 1/2 hour warm up time.

3) PH Meters - The proper calibration of pH meters requires the use of two buffer solutions and a thermometer. The two buffer solutions must cover the expected range of samples to be tested. A third buffer is used to confirm calibration. The pH meter should be calibrated each day. The temperature of the buffers must be entered into the meter.

4) Conductivity Meter - The conductivity meter does not require frequent calibration but should be checked against a known standard each day of use. Recalibrate when there is significant deviation with the value of the standard.

5) Ion Chromatograph- Calibration of the Ion Chromatograph is performed at least once each year and whenever: 1) Controls are out of range; or, 2) the column, suppressor or detector is changed.

6) Inductively Coupled Plasma/Mass Spectrometer – Calibration of the ICP-MS is performed every day of analysis and whenever controls are out of range. See the SOP for more information.

ANALYTICAL PROCEDURES

The laboratory employs only methods approved by Environmental Laboratory Accreditation Program. Analysts must conduct sufficient preliminary tests using the methodology and typical samples to demonstrate competence in the use of the measurement procedure.

Each time an analytical procedure is performed controls are included and duplicate samples and known additions are tested to insure accuracy and precision. Results are not reported unless all controls are within acceptance limits referenced in Standard Methods 18th Edition, 1992.

To monitor reliability of analytical measurements, data is periodically obtained on detection limits, accuracy, precision and recovery.

ACQUISITION, REDUCTION, VALIDATION OF REPORTING DATA

The analytical chemist is responsible for describing and reporting the data in an appropriate manner. In order to insure the accurate transcription, calculation and reporting of analytical data, the chemist will adhere to the following quality assurance procedures.

1) Use documented procedures and record all significant experimental details in such a way that the measurements could be reproduced by a competent analyst at a later date.

2) All measurements are made so that results are representative of the matrix (soil, water, etc.) and conditions being measured.

3) Report data only to the number of significant figures consistent with their limits of uncertainty.

4) Report data with the proper units of concentration. Units should be chosen which clearly indicate whether the concentration is in terms of weight by weight, weight by volume or volume by volume. Unless otherwise specified, all data are calculated and reported in standard units to allow comparison with data reported by other laboratories.

5) The analytical methodology used will be cited. The raw data for each sample, along with reagent blanks, control, and spiked samples will be suitably identified if included in the report. If average values are reported, an expression of the precision, including the number of measurements, must be included.

6) The report should include date and place of sampling, sampling point, the name of the sample collector, identification as to type of sample, date and time of submittal to the lab, date of analysis, name of the analyst, and the result. Any conditions which may effect the interpretation of the data should be noted in the report.. All results will be reviewed by a Water Quality Specialist or Public Health Chemist before a final report is released.

7) Laboratory records will be retained in a permanent file for three years.

8) Retain samples for one month after issuing final report and retain data and documentary evidence for three years.

INTERNAL QUALITY CONTROL

Quality Control (QC) may be defined as those measures undertaken in the laboratory to maintain the analytical testing process within acceptable limits of accuracy and precision.
The Quality Control Program consists of the following elements: documentation of operator competence, recovery of known additions, analysis of externally supplied standards, analysis of method blanks, and testing of replicate samples:

1) Operator competence The principal analyst is responsible for: 1) developing a standardized training syllabus for the methods employed in the laboratory; 2) assuring that test personnel are adequately trained; 3) assessing the competency of test personnel, and 4) maintaining documentation of training and competency of all test personnel.

    a) Before test personnel are permitted to do reportable work , competency in performing the analysis is to be demonstrated. Commonly, the analyst performs replicate analysis under the supervision of the principal analyst. General limits for acceptable work are found in Standard Methods 18th Edition, 1992 in Table 1020 :I.

    b) After initial demonstration of competency, the principal analyst will assure test personnel maintain competency through testing internal or external proficiency test samples at least once each year.

2) With each batch of samples tested, controls will be tested to verify the accuracy of results as described below. Controls used with each method are outlined in Appendix D.

    a) Recovery of known additions as part of all regular analytical protocols except titrimetric and gravimetric methods. Use known additions to verify the absence of matrix effects. Spiked samples shall be analyzed with a minimum frequency of ten percent of the samples per matrix per batch of samples. Spike recovery must be between 80-120% for potable water (75-125% for waste water). When a spike sample fails to meet this criteria, retest all samples following the last acceptable spike sample. Spike recovery calculated as % of the known addition recovered.

    b) Analyze control standards with a minimum frequency of ten percent of the samples per matrix, per batch of samples. If there are less than 10 samples in a batch, at least one per matrix per batch must be analyzed. The concentration of the sample shall be within the working range of the method. Sources of these samples include but are not limited to: performance evaluation samples from the EPA, commercially available standards, or standards prepared in-house but from sources different from calibration standard. Control standards must be within the published acceptance range (for external controls). If the control standard does not have a published acceptance range, recovery of the control should be within 10% of the known value. When a control standard fails to meet this criteria, retest all samples following the last acceptable control.

c) Method blanks will be analyzed with each batch of samples. The use of method blanks provides a measurement of laboratory contamination. Blanks cannot exceed the minimum detection level. See Appendix A.

d) Replicate samples will be analyzed with a minimum frequency of ten percent of samples per matrix, per batch of samples for drinking water. For wastewater the requirement is 5%. If there are less than ten samples per batch, at least one sample per matrix per batch must be analyzed. If the analyte is not detected, replicate matrix spike samples will be analyzed. The percent difference between replicate samples must be within 20% for potable water (25% for wastewater). When a replicate sample fails to meet this criteria, retest all samples following the last acceptable replicates. Duplicate % difference calculated as the difference as a percent of the mean. [100(X1-X2)/avg].

e) In addition to the control standards tested with each run, an external reference standard for each analyte will be tested at least once each quarter.

All of the quality assurance control procedures will be followed in the laboratory. All documentation for these checks should be available for inspection by laboratory management.

PREVENTIVE MAINTENANCE

As part of the QA plan, the laboratory has a comprehensive preventive maintenance program. Balances, spectrophotometers, and other instruments undergo routine maintenance and accuracy checks by a manufacturer's representative or by laboratory personnel as described below. All preventive maintenance performed in-house is documented on preventive maintenance forms. Instrument s which undergo routine professional maintenance have labels affixed to indicate date of last servicing. Manufacturer's instructions and service manuals are readily accessible.

Adequate spare parts are kept on hand to perform routine maintenance and minimize downtime. The spectrophotometers have maintenance contracts that provide for immediate servicing in the event of malfunction. Equipment records documenting preventive maintenance and emergency servicing/repairs are kept for a minimum of three years.

1) Thermometer/temperature-reading instruments: Accuracy of thermometers or recording instruments are checked annually against a certified National Bureau of Standards (NBS) thermometer or one traceable to NBS and conforming to NBS specifications. All thermometers a relabeled with date calibrated and correction factor.

2) Balance: Balance accuracy is verified each week using ASTM type 1 reference weights. Accuracy checks are documented on preventive maintenance chart. Balances are serviced and certified annually through a maintenance contract. Type 1 weights are re-certified at least every five years.

3) pH meter: pH meters are standardized with at least two NIST traceable standard buffers (pH 4.0, 7.0, or 10.0) and compensated for temperature before each series of tests. A third buffer is used to confirm calibration. Date buffer solutions when opened and discard buffer after expiration date on bottle. Buffers prepared from powders are replaced after four weeks.

4) Water deionization unit: Conductivity of the RO and Nanopure water is checked each month. A heterotrophic plate count on Nanopure water is also performed monthly. Filters are changed as indicated by conductivity readings and heterotrophic plate count. Records are maintained on preventive maintenance chart. Water is tested annually for bacteriologic quality and heavy metals.

5) Autoclave: Autoclave charts are used to document date, time, temperature and contents of each load. Chem-di indicators and heat sensitive tape are used with each load to identify materials that have been autoclaved; results are recorded on autoclave chart. Autoclave performance is

checked each month with biological indicator (e.g. spore suspension). Autoclaves are serviced quarterly under maintenance contract. The accuracy of autoclave recording thermometer is checked annually. The autoclave operating temperature is monitored on a weekly basis.

6) Refrigerator: Temperatures are recorded daily and units defrosted and cleaned as needed. All media and reagents stored in the refrigerator are labeled.

7) Freezer: Temperatures are recorded daily. Identify and date materials stored. Defrost and clean semiannually; discard outdated materials.

8) Ultraviolet sterilization lamps: Unit is cleaned monthly by wiping lamps with a soft cloth moistened with ethanol. Test lamps quarterly with UV light meter and replace if they emit less than 70 % of initial output or if agar spread plates containing 200 to 250 microorganisms, exposed to the light for 2 minutes, do not show a count reduction of 99%.

9) Water bath: Fecal coliform water bath is checked twice daily. All other water baths are checked each day of use.

10) Incubator: Check and record temperature twice daily (morning and afternoon) on the shelf areas in use. Locate incubator where room temperature is in the range of 16 to 27O C.

11) Fume hoods/Biological Safety Cabinets: Fume hoods are checked once each month using a velometer; readings are recorded on preventive maintenance chart. Hoods and safety cabinets are certified annually through service contract.

PERFORMANCE AND SYSTEMS AUDITS

Corrective action is required when data is outside of predetermined limits for acceptability. The corrective actions can be triggered by the following quality assessment activities: Control Chart analysis; proficiency evaluation testing; and QA audits.

1) CONTROL CHART ANALYSIS:
The laboratory's quality assessment techniques will be used to maintain the precision and accuracy of all laboratory analyses within a state of statistical control. Precision and accuracy measurements are the best way to assess analytical performance. Precision is the degree of reproducibility of a particular analytical procedure. Accuracy is a measure of the agreement between an experimental determination and the true value.

a) PRECISION - Assess precision by replicate analysis, by repeated analysis of a stable standard, or by analysis of known additions to samples. Precision is specified by the standard deviation of the results. The formula for determining standard deviation (SD) is:

$$SD = \sqrt{\Sigma}\ (X1-X)^2/(N-1)$$

X1 is the value of the individual measurements; X is the mean of all measurements for a given sample and N is the number of measurements.

The purpose of determining precision is to establish the typical variance of the method in the absence of any matrix influence. In the course of determining precision, there are two cases that indicate there is a problem with the precision data:

i) The measured values show wide variation from one to another for a given day.

ii) The measured values show little variance from one to another for a given day, but the mean and standard deviation show wide variation from one day to another.

If either of the above occurs, factors such as sample homogeneity, instrument calibration, or analyst error should be checked, documented, and corrected. The precision measurements should then be repeated.

b) ACCURACY - The best method to determine accuracy is to spike an alequot of reagent water with a known amount of the constituent being measured and analyze the sample. The amount spiked should be at least five to ten times greater than the analytical detection limit.

To evaluate the data accuracy, the percent recovery of the spike must be determined. The formula for determining percent recovery is:

$$\% \text{ recovery} = [100(S - S1) \div S2]$$

Where S is the concentration of the spiked sample; S1 is the concentration of the unspiked sample; S2 is the concentration of the spike added to the sample.

If the percent recovery deviates significantly from 100% and the method has not demonstrated significant bias, the problem must be detected and corrected prior to continuing the analysis. Sources of this problem include incorrect standard or spike solution concentration or a problem in the procedural detection system.

Precision, accuracy, and detection limits for all methods used in the laboratory is comparable to values referenced in Standard Methods 18th Edition, 1992 and EPA Methods for Chemical Analysis of Water and Wastes, March 1983.

2) PERFORMANCE EVALUATION SAMPLES: The laboratory director is responsible for enrolling the laboratory in ELAP approved proficiency testing program(s) and assuring that proficiency testing is performed for all regulated tests. The principal analyst (Public Health Chemist) will conduct and document internal proficiency testing at least once a year for tests where proficiency testing is not available. Proficiency test samples are treated in the same manner as routine samples (ie. tested the same number of times, tested using personnel who routinely perform testing, tested using routine methods and tested during patient testing).

3) QUALITY ASSURANCE AUDIT: The quality assurance program will be audited quarterly and any deviations from the program will signal corrective action to be taken. Quality assurance audit will be documented in a written report. The audit will include the following aspect:

   a) Competency of test personnel must be evaluated annually and be documented

   b) Evidence of the systematic use of control samples, replicate measurements and reference materials all in conjunction with control charts.

   c) Proper labeling of reagents and samples.

   d) Use of approved methods.

e) Results on blind samples.

f) Acceptable safety equipment and procedures.

g) Quality assurance reports generated on a regular basis.

h) Documentation on equipment performance and maintenance.

i) Training records.

j) All relevant files accessible and organized.

k) Laboratory personnel following good laboratory practices.

l) Laboratory personnel following good measurement practices

The Public Health Chemist will be responsible for initiating and documenting any corrective action necessary. Corrective action will be documented on the appropriate control chart, performance evaluation report, or QA audit report. No data shall be reported until the cause of the problem is located and corrected or the laboratory demonstrates the cause was a random event and no longer affects data. Although the elimination of events requiring corrective action may not be achieved, a reduction in the repetition of these events is the objective of this program.

REFERENCES FOR QUALITY ASSURANCE DOCUMENT

1) Standard Method for the Examination of Water and Wastewater, 18th edition, 1992.

2) Handbook for Analytical Quality Control in Water and Wastewater Laboratories. EPA-600/4-79-019, March 1979, USEPA.

3) Manuals for the Certification of Laboratories Analyzing Drinking Water Criteria and Procedures/Quality Assurance. EPA QAMS-005/80, Interim Guidelines, EPA-570/9-82-009, USEPA.

4) Methods for Chemical Analysis for Water and Waste. EPA-600/4-79-020, March 1983.

Written by: Gerry Guibert & David Holland

Date: May 1993

Revised: January 1999
Revised: September 21, 2004

Approved by: ________________________________

(Laboratory Director's Signature)

Appendix A

Monterey County
Consolidated Chemistry Laboratory

ANALYTICAL METHODS FOR WATER ANALYSIS

PARAMETER	HOLD TIMES	METHOD REFERENCE	MDL	UNITS
Free Chlorine	.25 h; ASAP	SM 4500-Cl G	0.02	mg/L
Total Chlorine	.25 h; ASAP	SM 4500-Cl G	0.05	mg/L
Enterococcus	8 h	IDEXX	1/100 ml	
Heterotrophic Plate Count	8 h	SM 9215 B	1	CFU
E. coli – MPN	6 h waste 8 h source 30 h potable	SM 9221 B	2/100 ml	
Fecal Coliform – MPN	6 h waste 8 h source 30 h potable	SM 9221 B	1/100 ml	
Total Coliform – MPN	6 h waste 8 h source 30 h potable	SM 9221 B	2/100 ml	
Total Coliform – Quantitray	6 h waste 8 h source 30 h potable	SM 9223	1/100 ml	
E. coli – Presence/Absence	30 h potable	SM 9223	1/100 ml	
Total Coliform – P/A	30 h potable	SM 9223	1/100 ml	
pH	.25 h; ASAP	SM4500H B		pH units
Bicarbonate	ASAP (with pH)	SM 2320 B	10	mg/L
Calcium Carbonate	ASAP (with pH)	SM 2320 B	1	mg/L
Carbonate	ASAP (with pH)	SM 2320 B	1	mg/L
Solids	24 h	SM 2540 F	0.1	mL/L
Color Determination	48 h	SM 2120 B	2	CU
Odor	NS; 48 h (rec 6h)	SM 2150 B	1	TON
Turbidity	48 h	SM 2130 B	0.05	NTU
Nitrate	48 h	EPA 300.0	1	mg/L
Nitrite as (N)	48 h	SM 4500 NO2-B	10	ug/L
Total Dissolved Solids	7 d	SM 2540 C	5	mg/L
Total Suspended Solids	7 d	SM 2540 D	5	mg/L
Alkalinity	14 d	SM 2320 B	1.0	mg/L, CaCO3
Bromide	28 d	EPA 300.0	1	mg/L
Chloride	28 d	EPA 300.0	1	mg/L
Fluoride	28 d	EPA 300.0	0.02	mg/L
Sulfate	28 d	EPA 300.0	1	mg/L
Conductivity	28 d	SM 2510 B	1	umhos at 25C
Ammonia (N)	28 d	SM 4500 NH3 F	0.05	mg/L
Orthophosphate	NS; 28 d	SM 4500 P E	0.03	mg/L
Total Phosphorus	28 d	SM 4500 P E	0.03	mg/L

Monterey County
Consolidated Chemistry Laboratory

PARAMETER	HOLD TIMES	METHOD REFERENCE	MDL	UNITS
Aluminum	6 months	EPA 200.8	5	ug/L
Antimony	6 months	EPA 200.8	0.5	ug/L
Arsenic	6 months	EPA 200.8	1	ug/L
Barium	6 months	EPA 200.8	0.5	ug/L
Beryllium	6 months	EPA 200.8	0.5	ug/L
Cadmium	6 months	EPA 200.8	0.5	ug/L
Chromium	6 months	EPA 200.8	5	ug/L
Copper	6 months	EPA 200.8	0.5	ug/L
Iron	6 months	SM 3111B	100	ug/L
Lead	6 months	EPA 200.8	0.5	ug/L
Manganese	6 months	EPA 200.8	0.5	ug/L
Mercury	6 months	EPA 200.8	0.25	ug/L
Nickel	6 months	EPA 200.8	0.5	ug/L
Selenium	6 months	EPA 200.8	5	ug/L
Silver	6 months	EPA 200.8	5	ug/L
Thallium	6 months	EPA 200.8	0.5	ug/L
Zinc	6 months	EPA 200.8	5	ug/L
Calcium	6 months	SM 3111B	1.0	mg/L
Magnesium	6 months	SM 3111B	0.1	mg/L
Potassium	6 months	SM 3111B	0.1	mg/L
Sodium	6 months	SM 3111B	0.1	mg/L
Hardness as CaCO3	6 months	SM 2340 B	1.0	mg/L
Boron	6 months	SM 4500 B B	0.1	mg/L

Appen... B

ENVIRONMENTAL ANA' YSIS REQUEST FORM

MONTEREY COUNTY CONSOLI[...]D CHEMISTRY LABORATORY
1270 NATIVIDAD ROAD, SALINAS, CA...ORNIA 93906 Phone (831) 755-4516

Shaded areas for laboratory use only

Chain of Custody:

Collected by (Print & sign):	Received by:	Date & Time:
Relinquished by:	Received for Laboratory:	Date & Time:

Client Name:	Report Attention:	
Address:	Copy to:	
City, State, Zip:	Phone:	Fax:

ANALYSES REQUESTED

Laboratory Number	Sample ID or System #	Sample Site or Description	Collection Date & Time	Matrix(1) 1-Routine 2-Repeat 3-Replacement	No. of Containers	Coliform MMO ☐ Quanti ☐ Low-D ☐	Nitrate						

(1) **D**=Drinking Water (Specify as routine, repeat or replacement) **W**=Wastewater (Specify as grab or composite) **O**=Other (identify)

[ ] Payment received with delivery Amount: ________

Check: ________ Initials: ________

Receipt #: ________ Date: ________

Sample comments (irregularities/preservation, billing information if different than reporting):

SPECIFIC CONDUCTANCE
EPA 120.1/SM 2510 B
umhos at 25°C

Scope and Application:
This method is applicable to drinking, surface and saline waters, domestic and industrial wastes and acid rain.

Summary of Method:
The specific conductance of a sample is measured by use of a self-contained conductivity meter, the YSI Model 32. The conductivity meter is used in the temperature compensated mode.

Sample Criteria & Acceptability:
A minimum of 100 ml sample should be submitted in a clean container provided by the laboratory. Samples can be stored for up to 28 days at 4oC. The samples must be brought to room temperature before testing. If the sample does not meet the above criteria, document it on the worksheet but perform the test.

Reagents:
0.02 Molar Standard Potassium Chloride Solution:

1. Dry 0.85 g of Reagent Grade Potassium Chloride (KCl) for 4 hours at 105°C. Use immediately or store in a desiccator until use.
2. Dissolve 0.7456g of pre-dried potassium chloride in a 1 liter Class A volumetric flask using deionized water.
3. Label the flask with Potassium Standard Solution, 0.7456 g KCl/L, date made, outdate of 3 months, and initial.
4. Alternately, order two 500 ml containers of the Traceable Conductivity Calibration Standard near the 1414 micromho/cm range; from Fisher Scientific, Cat No. 09-328-11.

Control

1. Check deionized water. It should read less than 1 umho. If the reading is higher, clean cell and repeat reading of deionized water. If reading is still high, notify the Chemist.
2. Use current Quality Control sample with each run. The control must be in range before proceeding with specimens. The 0.01 M KCl can be used as control.

Conductance Meter Maintenance:

1. Store cell in deionized water. If the cell has been stored dry, soak in deionized water for 24 hours.
2. Check the platinum black coating on the electrode. If the coating appears thin or if it is flaking off the electrode, the cell should be cleaned and the electrodes replatinized. See "Instruction Manual YSI Model 32 Conductance Meter" pages 11 and 12 for instructions.
3. The electrode should be cleaned and replatinized every four months. Record the preventative maintenance on the "PM Worksheet".

Conductance Meter Calibration Check:
Instrument must be standardized with KCl solution before daily use.

1. Pour 50 ml of the standard potassium chloride solution into a 250 ml beaker. Alternately, immerse the conductivity cell and thermometer in the Rinse Bottle, then transfer to the Read Bottle for actual reading
2. Immerse conductivity cell in sample. The electrodes must be submerged and the electrode chamber must be free of trapped air. Tap the cell to remove any bubbles, and dip it two or three times to assure proper wetting.
3. Rotate the Range Switch to the lowest range position that gives a reading (within range) on the display. An over-range value is indicated by a "1" followed by blanks. An under-range value is indicated by a reading followed by a small letter "u". Readings may be in error when operating in the under range conditions. On the 0.1 – 2 micromho range; allow extra time to stabilize.
4. The conductance value of the solution is displayed on the meter. The units in which it is to be read are determined by the Range Switch, either in mU or in uU (or milli and micro siemens).

   2 uU, 20 uU, 200 uU reading = final result
   2 mU, 20 mU, 200 mU readings x 1000 = final result

5. Use the table below to check accuracy of cell constant:

Temperature in Centigrade	Conductivity of 0.01 M KCl Micro-omhos/cm
21	1305
22	1332
23	1359
24	1386
25	1413
26	1441
27	1468
28	1496

6. If the standard is within range, rinse the cell three times with deionized water, and start testing unknowns as described in steps 2-4.

Reporting:
Report results to three significant figures. Report in units of micromhos per centimeter at 25 ^{o}C

References:

1. Instruction Manual YSI Model 32 Conductance Meter", Item 060818, PN A32018 R, October 88 EP
2. Methods for Chemical Analysis of Water and Wastes", EPA- 600: 4-79-020, March 1983, pages 120.1-1 to 120.1-3.
3. "Standard Methods for the Examination of Water and Wastewater", 18th Edition, 1992.

Written by: David Perez, Date: February 1993
Revised: January 12, 2007

Approved by:______________________________
Chemist

pH
SM 4500-H B
Electrometric

Scope and Application
Application to drinking, surface, ground and saline waters as well as acid rain, and wastewater (domestic and industrial.

Principle of Operation
pH is defined as the negative logarithm of the hydrogen ion concentration in moles per liter. The pH scale goes from zero to fourteen with a value of seven units to be considered neutral. Values below seven are acid; values above seven are basic. It is important to note that a one-unit change in pH represents a ten-fold change in the concentration of the hydrogen ion.

pH has a great impact on almost all biological and chemical processes used for water and wastewater treatment, and proper measurement of this value is critical. pH is measured using a pH meter consisting of a potentiometer, glass pH electrode, reference electrode and temperature compensating device. When calibrating the instrument, use two buffers that bracket the expected pH value for greatest accuracy.

Specimen collection and Handling
Collect sample in plastic or glass container. Test sample immediately upon receiving and/or within two hours after collection.

Instrument Calibration:
Two buffer calibration:

1. Fill a 50 ml beaker with up to 30 ml of pH 7 buffer. Add a stir bar and set the knob on the magnetic stirrer to the second line on the dial (slow spin). Place the electrode in the pH 7 buffer; make sure that the reference electrode is filled with KCl and is open. Allow the electrode to equilibrate for 5 minutes.

2. Release Standby button and press the pH button. Measure the temperature of the buffer solution and set the temperature control. Turn the large slope knob to 100 and the inner know fully clockwise.

3. Adjust the calibration control until the readout displays 7.00. Press the mv button and record the mv reading on the worksheet. Remove electrodes from the buffer and rinse with deionized water.

4. Fill a 50 ml beaker with up to 30 ml of pH 4 buffer. Add a stir bar and set the knob n the magnetic stirrer to the second line on the dial (slow spin). Place the electrode in the pH 4 buffer and allow the electrode to equilibrate for 5 minutes. Press the pH button.

5. Adjust the slope knob until the readout displays 4.00. Press the mv button and record the mv reading on the worksheet. Remove electrodes from the buffer and rinse with deionized water.

6. Fill a 50 ml beaker with up to 30 ml of pH 6.86 buffer. Add a stir bar and set the knob n the magnetic stirrer to the second line on the dial (slow spin). Place the electrode in the pH 6.86 buffer and allow the electrode to equilibrate for 5 minutes. Press the pH button and record the result on the worksheet and quality control graph. PH should be 6.86 ± 0.1; notify chemist if out of range.

7. Rinse the electrodes with deionized water.

8. Record mv readings of calibration buffers. Calculate change in millivolts and divide by 3. The result should be 58 ± 2 mv.

9. If the slope is within limits, begin testing unknowns. If the slope is out of range, re-calibrate the pH meter. If the second calibration slope is out of range, notify the chemist.

Controls

1. Run every tenth specimen in duplicate. The duplicates should be within 20% of each other.

2. Check the 6.86 control buffer after every tenth specimen. Record the results on the worksheet and quality control chart.

Procedure

Once the pH meter has been calibrated, the unknown samples can be tested.

1. Pour 30 ml of unknown (or 50 ml of unknown if also testing for alkalinity) into a 150 ml beaker containing a small stir bar. Start the stirrer. Keep the automatic stirrer at a constant moderate rate (The speed is marked on the dial by a pen marking).
2. Allow the display to stabilize, and record the results on the worksheet.
3. Rinse the electrode with deionized water between specimens. Blot dry with a 'kimwipe'. Do not rub the electrode; the static electricity can alter readings.

Reporting

Report the result to the nearest tenth (0.1).

References:

1. "Method for Chemical analysis of Water and Wastes", EPA 600/4-79-020, Revised March 1983.
2. Standard Methods for the Examination of Water and Wastewater 18th edition 1992

Written by: David Perez
Date: December 1994

Approved by: ____________________________
Chemist

Total Alkalinity
SM 2320 B
Titration

Principle
Total alkalinity is defined as the acid-neutralizing capability of water. It is reported as due to bicarbonate (HCO3), carbonate (CO3), and hydroxide (OH). Unaltered sample is titrated potentiometrically to pH 8.3 endpoint for "carbonate" alkalinity and 4.5 endpoint for "bicarbonate" alkalinity.
Note: Samples with a pH less than 8.3 (i.e. most drinking water samples) are reported as having non-detectable hydroxide and carbonate alkalinity; for these samples total alkalinity is due entirely to the bicarbonate content of the water. Bicarbonate alkalinity (as HCO3) can be calculated from total alkalinity (as CaCO3) by multiplying by a factor of 1.22.
Applicable to drinking and surface waters, domestic and industrial wastes, and saline waters.

Sample Criteria & Acceptability
Samples should be submitted in clean containers provided by the laboratory. A minimum of 100ml of sample should be submitted for testing. Samples, which cannot be tested within 24 hours of collection, should be stored at $4^{\circ}C$ and tested within 14 days. If any sample does not meet the above criteria, document it on the worksheet but perform the test.

Equipment
1. pH meter that can read to 0.05 pH units.
2. Two 1,000 ml Class A volumetric flasks.
3. Magnetic stirrer and magnetic stir bars.
4. Two 100 mL beakers.
5. One 250 mL flask
6. One 50 mL graduated cylinder

Reagents
The day before preparing standardize sulfuric acid, dry 0.1 g of Tris Buffer for at least 3 hours at 103 C (overnight is acceptable). After drying, immediately weigh out the Tris buffer. If that is not possible, store the reagent in the desiccators until used.

1. Standardized 0.02 N H_2SO_4 (sulfuric acid) + 0.004 units:

   The concentrated H_2SO_4 and stock 1.0 N H2SO4 may be found in acid cabinet below hood.

   a. Prepare a 1.0 N H H_2SO_4 Stock Solution: Fill a 1,000 ml Class A volumetric flask three quarters full with deionized water. Carefully add 28.0 mL of concentrated H_2SO_4 using a 25 mL and 3 mL Class A volumetric pipette. Fill to the mark with deionized water and mix. Transfer to plastic bottle and label as 1.0 N H_2SO_4 Stock Solution, date made, outdate of 1 year, and initial. Cap tightly.

   b. Prepare a standardized 0.02 N H_2SO_4.
      1. Fill a 1,000 mL Class A volumetric flask three quarters full with deionized water. Carefully add 20.0 mL of the Stock H_2SO_4 using a 20 mL Class A pipette. Fill to mark and mix thoroughly.
      2. Weigh out between 0.0700 to 0.0800 g of Tris buffer using the analytical balance. Record the weight of the Tris Buffer to four places in the "Standard & Reagent Preparation" notebook. Add the buffer to 250 mL flask containing 25 mL of deionized water and stir bar; mix.

3. Add 3 drops of Hach Brom Cresol Green-Methyl Red indicator solution (Hach cat. number 451) to the Tris buffer solution.
4. Fill the titrating buret with the 0.02 N H_2SO_4 solution. Titrate the solution until a stable pink color is reached. Record the volume of reagent used.
5. Calculations:
   Normality of H_2SO_4 = Wt of Tris Buffer (g) ÷ (0.121137 g/meq Tris X mL of 0.02 N H_2SO_4 used)
   Example:
   0.0879 g Tris Buffer ÷ (0.121137 g/meq Tris X 35.7 ml H_2SO_4) = 0.0203 N H H_2SO_4
6. Transfer the 0.02 N H_2SO_4 to a one liter plastic bottle. Record the normality on the bottle, date made, outdate of 3 months, and initial. Store at room temperature.

2. Alternatively, order 0.02 N H_2SO_4, already prepared and standardized from a vendor such as Fisher Scientific. Record lot on QC worksheet.

Controls

1. Run deionized water as blank. Value of blank should be less than 2 mg/L of calcium carbonate (approximately 0.1 mL of H_2SO_4).

2. Use one quality control standard. This is a solution of sodium bicarbonate (100 mg/l). Run once with each set of samples and record results on control chart. Consult chemist if out of control situation exists.

3. Run every 10th specimen in duplicate. Calculate the relative standard deviation (RSD) of the replicates using the following formula: RSD=SD ÷ mean x 100. The RSD should be less than 10% If the replicates are outside of this range, repeat the specimen a third time. Check with the chemist for instructions.

4. Each quarter an external reference sample is to be analyzed. In the case of results exceeding acceptance values, document corrective action. Place any corrective action records in proficiency file

Procedure:

If applicable, standardize the pH meter each day of use (see supplemental procedure). Record slope with offset on worksheet.

Run the blank and control first. If the control is within range (range found in the "QC Inorganic True Value" binder), run the samples. Repeat the control if it is out of range. Notify the chemist if the control is out of range a second time.

1. Add 50 mL of control or sample to a 100 ml beaker containing a magnetic stir bar. Set magnetic stirrer at low speed.

2. Carefully lower pH probe into the solution. **If the pH is above 8.3 consult principal analyst!**

3. Fill the titrating buret to the zero mark with the standardized H2SO4. Carefully add the H2SO4 to the sample until a pH of 4.5 ± 0.05 is reached.

4. Record the volume of H_2SO_4 added to the sample, to the nearest tenth, on the chemistry worksheet.

5. Rinse the pH electrode with deionized water. Measure out the next sample, refill the buret, and titrate the next specimen.

Calculations:

Use the following formula to calculate the alkalinity as mg/L of calcium carbonate.
Exception: For alkalinity below 20 mg/L use low alkalinity calculation procedure (refer to SM2320B part 5)

mg/L = (mL of H_2SO_4 – 0.1) X normality of H_2SO_4 X (50,000 ÷ ml of sample)
Example (for 50 ml sample):
(28.6 mL – 0.1) X 0.02 X (50,000÷50ml) = 570 mg/L of Calcium Carbonate
or
(28.6 ml – 0.1 ml) X (20) = 570 mg/L of Calcium Carbonate

Reporting

Report in **whole** numbers; round off to 3 significant figures. Examples:
2,902.5 = 2,900; 1,125.9 = 1,130; 23.65 = 24

References

Standard Methods for the Examination of Water and Wastewater 18th edition 1992

Written by: David Perez
Date: January 1993
Revised by: G. R. Guibert
Date: August, 1998

Approved by:__________________________
Principal Analyst

Varian Flame AA Procedure
SM 3111B
For Ca, Mg, Na, K and Fe

Principle:
In flame atomic absorption spectrometry, a sample is aspirated into a flame and atomized. A light beam is directed through the flame, into a monochrometer and into a detector that measures the amount of light absorbed. Because each metal has its own characteristic absorption wavelength, a source lamp composed of that element is used. The amount of energy absorbed in the flame is proportional to the concentration of the element in the sample.

Sample Collection/Handling:
Use metal free collection bottle to collect sample. Collect one liter of sample. Smaller volumes (not less than 200 ml) can be used if necessary. On collection, acidify samples to pH <2 with 1:1 nitric acid, usually 3ml per liter. If samples are not acidified at time of collection, add acid upon receipt in lab and hold for minimum of 16 hours before analysis.[40 CFR 141.23(K)].

Sample Preparation:
Samples containing particulate or organic material require pretreatment before analysis. Samples with a turbidity <1 NTU, no odor and single phase may be analyzed directly. Digest all other samples before determining total metals.

Digestion Procedure for total metals:
Drinking water samples with turbidity >1 NTU can be analyzed following digestion with nitric acid. See procedure SM 3030E (Nitric Acid Digestion). Wastewater samples are better digested using method SM 3030F part b (Nitric Acid-Hydrochloric Acid Digestion). Report as total recoverable metal.

Sample criteria:
Except as noted, specimens that do not meet the criteria below should be immediately reported as "no test" with an explanatory note:

1. Samples submitted in improper collection container.
2. Sample inadequately identified. (Sample has no identification, or cannot be matched to a laboratory request form).
3. Sample quantity insufficient
4. Sample container broken or leaked in transit.

Special Instructions:
All glassware and pipettes used in this procedure must be cleaned using glassware-cleaning procedure. See document in kitchen.

Reagents:

1. Nitric Acid (HNO3). Use high purity nitric acid 1+1.
2. Lanthanum solution (1.11%): Dissolve 58.65 g lanthanum oxide in 250 ml of conc HCL. Add slowly with stirring until dissolved and dilute to about 900 ml. Allow to cool for a few hours then dilute to final 1000 ml volume. Used for Ca, Mg, Na, and K analysis.
3. Calcium solution: Dissolve 630 mg calcium carbonate, CACO3, in 50 ml of 1+5 HCL. If necessary, boil gently to obtain complete solution. Cool and dilute to 1000 mL with water. Used for Fe analysis.
4. Standard Metal solutions: Standard metal solutions are prepared from 1000 mg/l AA or ICP-MS standards purchased from Ricca Chemical company, Spex Certiprep, LabChem, Fisher Scientific or VWR. A standard from EM scientific (ICP Multi-element Standard) is very convenient for calibration standards.
5. Deionized Water from Millipore system – metal free water.

Instrument Set-up:
Use the Varian Spectra 300AA operating in the flame mode with Air Acetylene burner.

1. Turn on exhaust hood. Switch is located in the corner by the Chemistry room refrigerator. Note: Turn switch until it clicks on. If you continue turning the switch after it clicks, the airflow will be reduced.

2. Turn on "Acetylene" gas cylinder located outside in the "Safety Storage" shed. The correct door housing the tank is labeled "Acetylene". Pressure should be set at 8-9 PSI.
   Note: The cylinder valve is opened by turning the handle only 1/4 turn counterclockwise. Replace cylinder when pressure in tank drops below 100 psi. This prevents acetone from entering instrument.

3. Check the Varian Spectra AA 300A unit to see if the burner is installed.

4. Check to see if the cathode lamp required is in the correct socket position, and it is lined up in the "Operating Lamp"
   Note: Lamps are stored in the top drawer located directly across from the GTA 96 Graphite Tube Atomizer (next to hood).

5. Turn on the equipment in the following order (allow a 20 minute warm-up period):
   Note: If the computer is already on, turn it off.
   a. Spectra AA 300A: switch located on lower right front of instrument.
   b. IBM PC and Printer: Turn surge suppressor on (power supply); hit reset button.

Once the unit has been set-up, program the machine for testing by:

1. Start at the "C:" prompt. Press "M" and "Enter".

2. Press "Spectra Flame"

3. Press "Index" (F10). Enter number 10, "Sequence Selection", press "Enter" key.

4. Select element to be tested

5. Press "Sequence Control" (F6). Enter number of samples to be tested.

6. Press "Index" (F10), enter number 6, "Optimization", press "Enter" key.

7. The Screen will display two signal bar graphs. Check the previous week worksheet for the "Photomultiplier voltage" reading.

8. Maximize the lamp signal of the Cathode tube using the two thumbscrews located on the back of the lamp socket (see figure 5.8).
   a. Watch the bar graph as you turn one thumbscrew. Once the value reaches .9 or greater press "Rescale" (F1).
   b. Check the Photomutiplier Voltage display on the screen, after rescaling. If the voltage is higher than the preceding week, continue adjusting and rescaling until the proper voltage is reached. If you are unable to reach the proper voltage, try adjusting the second screw.
   c. Note: Normally the voltage stays the same from week to week, but as the lamp nears the end of its usefulness, the voltage reading will go up. If a new lamp is installed, the starting voltage may be different than the previous lamp. Record millivolt reading on worksheet.

9. After adjusting for maximum signal, hit "Rescale" (F1). The photomultiplier voltage will be displayed. If the reading matches the previous week, record the voltage on the new worksheet. If it is out of range, readjust lamps. If voltage is still out of range, notify Chemist.

10. Press "Index" (F10) key and select "Standards" (number 7). Verify that the values of the standards are correct (see previous worksheet for standard values). To select a value to change, use the up and down arrows. Enter the correct value with the keyboard.

11. Check to see that drain hose, located below the Spectra 300A, is inserted into the drain bottle. (empty after each use).

12. Press "Index" key, enter number 18 (Signal Graphics), and press "Enter".

13. Press "Shift" and "Instrument Zero" (F10).

14. Light burner by pressing ignite button. Aspirate DI water for about 10 minutes. This will allow burner temperature to stabilize.

Standard and Sample Preparation:
Required sample preparation depends on the metal form being measured.

Procedure for Ca, Mg, Na, and K

1. Label the 10 ml beakers with the standard value; label the sample beakers with the last three numbers of the tiny tab number. Using the adjustable pipette, pipette 1.0 ml of sample or standard into each disposable beakers.

2. Add 9.0 ml of 1.11% lanthanum to each sample or standard using the adjustable pipette.

3. Repeat the process once again by diluting 1 ml of the diluted sample to 10 ml with the 1.11% Lanthanum. The samples have now been diluted 1:10 and 1:100. Alternatively use proportionally smaller volumes (i.e. .5 ml sample and 4.5 ml of 1.11% lanthanum).

4. The standards are prepared from stock solutions that when diluted 1:10 will give the necessary concentrations for calibration. The stock solutions are prepared from 1000 ppm standard metal solutions purchased from Ricca Chemical Co. Record dates of preparation and expiration (3 months) in sample prep manual.

5. The final concentration of calibration standards will be,

    1. Ca: 1.00, 3.00, 5.00 and 10.00 mg/l
    2. Mg 0.10, 0.50, 1.00 and 1.50 mg/l
    3. Na 0.10, 0.50, 1.00, 1.50 and 2.50 mg/l
    4. K 0.10, 0.50, 1.00, 1.50 and 2.50 mg/l

6. Set report format: Go back to index by pressing the "Index" (F10) key, then select the "Report Format" (number 13). Here you can enter the name of the operator, batch name, and date. No other changes are usually necessary.

7. Start program: Press the "Start" (F11). The screen will show the message "Select Lamp 3"; press "Start" (F11). The program will now run to completion.

8. Calibration of other Metals besides Fe/Mn: The other metals tested by flame AA does not require an ionization suppressor and can be directly aspirated. See specific method on computer for required calibration standards.

Standard and Sample Preparation: Procedure for Fe:

1. Label the sample beakers with the last three numbers of the tiny tab number. Using the adjustable pipette, pipette 1.0 ml of Ca solution into each disposable beakers.

2. Add 4.0 ml of sample to each beaker using the adjustable pipette.

3. The standards are prepared from 1000 ppm standard metal solutions purchased from LabChem or Spex Certiprep. Add 20 ml Ca solution and 1 ml conc HNO3 to each 100 ml of standard prepared. Record dates of preparation and expiration (3 months) in sample prep manual.

4. The final concentration of Fe calibration standards will be: 0.3, 0.5, 1.0, and 3.00 mg/l

5. Set report format: Go back to index by pressing the "Index" (F10) key, then select the "Report Format" (number 13). Here you can enter the name of the operator, batch name, and date. No other changes are usually necessary.

6. Start program: Press the "Start" (F11). The screen will show the message "Select Lamp 3"; press "Start" (F11). The program will now run to completion.

Quality Control:

1. Analyze a Blank after every 10 samples to verify baseline stability. Rezero when necessary.
2. Duplicate Spikes - replicate spikes are to be performed on 10% of samples. Recovery of spike in drinking water should be between 80% and 120% with a precision of 20%. Recovery of spike in wastewater should be between 75-125% with a precision of 25%. Spike level should not exceed MCL for analyte. Spiking solutions are available from Cresent Chemical Co.or SPEX.
3. External Reference Sample - Analyze a known reference sample after initial calibration and after every ten samples to confirm the test is in control.
4. See Table 3111:III in Standard Methods for recommended concentrations of standards to be run, limits of acceptability, and reported single operator precision data.
5. Analyze External Reference Sample on quarterly basis. Solutions available from APG, ERA or SPEX.

CRITERIA FOR ACCEPTABILITY OF RUN

1. Recoveries of spikes and controls are within acceptable range.
2. Blank values below detection levels.
3. Acceptable levels of precision.

NOTE: If any of the acceptance criteria are not met, the analyst must stop the run, correct the problem and and retest the samples.

OUT OF CONTROL PLAN

No sample should be reported until the all acceptance criteria have met. Or the out-of-control condition has been corrected and any problems or departure from protocol identified.

Trouble Shooting:

1. PROBLEM - poor precision,
   Check alignment of hollow cathode lamp. Check that capillary hose is not clogged. Make sure burner is clean and flame appears smooth and even. Replace pinched or crimped capillary tubing.

2. PROBLEM - error message
   Refer to instrument service manual

3. PROBLEM - Contamination
   Check supplies associated with sample collection for contamination. Check rinse water, sample diluent, pipettes, sample cups. Make sure work area is free from dust.

Shutdown Procedure:
Turn off acetylene, IBM PC,and AA300, and exhaust hood, in that order.

Calculations:
The results will be printed and should be recorded on a worksheet. The dilution factor must be shown and considered in the calculations.

Reporting:

1. The data from the printout should be transferred to the worksheet. Verify that controls were within acceptable range and that duplicates are within range.

2. The lab clerk enters the results into the computer. Results are reported in units and number of significant figures consistent with MDL of method.

References:

1. "Analytical Methods for Flame Atomic Absorption Spectrometry" Varian Techtron Pty, Limited, 1989.

2."Standard Methods for the Examination of Water and Wastewater"
18th Edition 1992 by APHA, AWWA, and the WEF.

Written by: David Holland
Date: January 1999

Approved by:________________________
Laboratory Director

DETERMINATION OF INORGANIC ANIONS
BY ION CHROMATOGRAPHY (EPA METHOD 300.0)
USING THE DIONEX DX-80 ION ANALYZER

PRINCIPLE
This method determines the following inorganic anions: fluoride, chloride, nitrite, bromide, nitrate, phosphate and sulfate.

A small volume of sample (approx. 1 ml) is loaded into the ion chromatograph. The injection valve injects 10 ul of the sample into the flow of eluent. The eluent (a NaHCO3 - Na2CO3 solution) flows continuously through the IC and serves as a carrier for the 10 ul of sample and facilitates in the separation process.

The anions of interest are separated using suppressed conductivity detection, and are identified and quantified by comparing data to those obtain from a standard solution. The major parts of the system are the liquid eluent, high pressure pump, sample injector, guard column, the separator column, the chemical suppressor and the conductivity detector. The guard column protects the separator column, which separates the anions based on their size and charge. The function of the suppressor is to chemically reduce the background conductivity of the electrolytes in the eluent, and to convert the sample anions into a more conductive form. The detector then detects the conductivity of the solution, which varies depending on the concentrations of the anions (higher conductivity indicates a greater concentration of the anion).

SAMPLE CRITERIA
The holding times for drinking water samples are as follows:

Fl^-	28 days
Cl^-	28 days
NO_2^-	48 hours
NO_3^-	48 hours
SO_4^-	28 days
Br^-	28 days

Samples submitted for IC testing routinely should be run within 48 hours of collection, especially for nitrite and nitrate. If testing needs to be delayed, the sample can be preserved with sulfuric acid; preserved samples can be held for up to 28 days and the nitrate results reported as combined Nitrate/Nitrite. Any samples not tested within specified holding times should be identified on the worksheet.

Samples bottles dedicated for IC testing only are placed on the IC bench. As soon as a sample is setup, place it on the white tray for easier storage. After 6 weeks the containers should be emptied and discarded. Nondedicated samples (i.e. those also submitted for additional testing) should be returned to the designated cart after IC testing.

QUALITY ASSURANCE

Operator competency - Ion chromatography may be performed only by analysts who have been trained and who have demonstrated competency with the procedure. One check consists of preparing the calibration standards and calibrating the I.C. An r-value of 0.995 or higher (correlation coefficient of 99.95%) in the linear fit type must be attained for each analyte of interest. Another way to demonstrate competence is to run a minimum of four replicate analyses of an independently prepared sample. Each analyte of interest in the sample should have a known concentration between 5 and 50 times the MDL.

Blank - A blank consisting of nanopure water should be included at the beginning of each run. The results for the blank must be below the MDL for each analyte.

Control standard(s) - Controls representing two concentration levels for each analyte (ICMIX HIGH & ICMIX LOW) must be analyzed as described below. The source of the analytes used to prepare these controls must be different from the source used to prepare the calibration standards. An ICMIX HIGH stock solution of the 7 anions with the following final concentrations:

Anion	*Final Conc*	*Preparation in 500 ml volumetric flask*
Fl^-	20 ppm	10 ml of 1000 ppm Fl std
Cl^-	100 ppm	50 ml of 1000 ppm Cl std
NO2	65.5 ppm	10 ml of 1000 ppm NO2-N std
Br^-	20 ppm	10 ml of 1000 ppm Br std
NO3	100 ppm	50 ml of 1000 ppm NO3 std
PO4	100 ppm	50 ml of 1000 ppm PO4 std
SO4	100 ppm	50 ml of 1000 ppm SO4 std

should be kept on hand. Use this undiluted at the beginning of the run and after every tenth sample. Each week, prepare an ICMIX LOW solution from the ICMIX HIGH solution as follows: Using a 100 ml volumetric flask add 1 ml if ICMIX HIGH using the 1 ml volumetric pipet and fill to mark with nanopure water. Record date made in the IC logbook under Quality Control. Run the IC LOW at the beginning of the days run and after every 10^{th} sample after the IC HIGH. The percent recovery for each anion should be between 90 and 110%.

Duplicate spikes – Duplicate spikes should be run after every tenth sample. The spike should not be less than four times the MDL, and it should increase each anion concentration by more than 25% of the background value. A suitable spike can be prepared by adding one part ICMIX HIGH to three parts sample. The average percent recovery for each anion should be between 80 and 120%. The duplicate spikes should be within 10% of each other. Record average percent recovery of spikes and duplicate percent difference on worksheets. Note: if the concentration of the spike is less than 25% of the background concentration, the spike recovery should not be calculated.

If any of the above control criteria are not met, do not report sample results until the problem has been resolved.

External controls & chart analysis - In addition to the control standards tested with each batch of samples, an external reference standard (i.e. SPEX IC standard or WS proficiency sample) should be tested on a quarterly basis; however we like to run one at the end of each run.

CALIBRATION FOR GOUNDWATER (DRINKING WATER AND MONITORING WELLS):

Calibration for groundwater samples is described below. Calibration should be performed whenever: 1) controls are out of range; 2) a new batch/lot of eluent/regenerant is made or 3) when a column, suppressor or detector is changed.

1. Prepare 1/10, 1/100, 1/1000 dilutions of the calibration standard ordered from Dionex, which contains 20 mg/l fluoride, 100mg/l chloride, 100 mg/L nitrite, 100 mg/L bromide, 100 mg/l nitrate, 200 mg/L phosphate and 100 mg/l sulfate.

2. Run calibration standards beginning with the highest dilution (1/1000) first.

3. Create calibration sequence: File – New – Sequence – Standards – Next. Skip section on Choosing Timebase – name the sequence *calibMMDDYEAR* and initials – Next – Done.

4. Add sequence to batch file before starting

5. After all four calibration standards have been ran, check the calibration curve.

   a) Double click on any of the calibration standards (Cal Std 1). You will get a chromatograph

   b) Click on Calibration Plot icon, upper right corner or click on VIEW – Calibration Plot. You will see a graph of the first analyte along with the correlation coefficient percentage for each analyte. Only anaytes with percentage of 99.5 or greater are acceptable. Generally try for a 99.98% for an average of all seven analytes to pass quality control checks. See the principle analyst if the result is a lesser value.

   c) The mean retention times and detection range are automatic on the DX-80 Ion Analyzer and can not be changed or edited.

PREPARE MDL STUDY

The Method Detection Limit is the lowest concentration of a substance that can be identified with accuracy and confidence by a certain method or analysis.

1) Prepare a Cal Std 1 level each analyte separately using the secondary standards (not Dionex mix)
2) Make seven replicates of this dilution and run through the Ion Analyzer under the Unknown Method.
3) Collect data and calculate the standard deviation for the seven replicates. Multiply the standard deviation values by 3.143. This number will be the Method Detection Limit.

GENERATE BACKLOG REPORT:

1) On a network computer – not the Instrument computer. Double click on LABWORKS icon. Enter password. Click on OK. Click on backlog. Click on analysis code. Click on OK. Type in #ICANION. Click on OK. Click on display report. Click on print. Click on exit until you are out.

2) Check the clipboard to see if a worksheet has been initiated listing samples that need repeat testing; if so, append worksheet with samples on backlog report.
   a) Account for all specimens on backlog report
      i) Samples may have been tested in a previous run but not recorded. Record these results and give to the clerk.
      ii) If a sample appears on the backlog but needs to be tested by a different method (i.e. wastewater), inform the clerk so that the analysis ordered can be modified.
   b) Include any "new" samples on the I.C. bench that have not yet been entered into the computer.

SAMPLE PREPARATION

Groundwater (drinking water and monitoring wells) should be filtered through 0.45 um membrane filters before injection:

1) Rinse the syringe once with the sample water. Then fill syringe with about 10 ml of sample water.
2) Filter a minimum of 2 ml of sample through the 0.45 membrane into a labeled autosampler vial discarding the first few drops.
3) Place autosampler cap on vial and press down using the provided tool. Make sure the cap goes in straight and remove any air bubbles seen in the vial (invert or knock gently).
4) Place sample in autosampler rack. The order in the rack must match that on the schedule. Note: If you suspect the result of a sample to be above that of the calibration standard for an analyte, make an appropriate dilution. Check by measuring conductivity – anything greater than 700 uS will need to be diluted.
5) Include duplicate spikes for every 10th sample. Add 1 part ICMIX high to 3 parts filtered sample. Then IC HIGH, LRB, IC LOW. The laboratory reagent blank (LRB) is necessary to minimize carry over as the IC low is 100 times less than the High. Double check any samples where analyte concentrations are low after a high sample to verify analyte is even detected.

Samples which may contain high concentrations of chloride or organic contaminants (Carmel Area Wastewater District and ESF), are run on the DX-100 and require additional filtering through Dionex OnGuard P, Dionex OnGuard Ag, and Dionex OnGuard H filters before injection. See supplemental procedures.

SYSTEM START-UP:

1) Ensure the **eluent** bottle is at least ¼ full. If it is less, depending on size of run, prepare new eluent (and regenerant):
   a) Prepare 2 liters of a final eluent concentration of 8.0 mM Sodium Carbonate and 1.0 mM Sodium Bicarbonate by diluting one Dionex AS 14A Eluent Concentrate bottle (P/N 057060) into two 1L-volumetric flasks. Bring each to volume (1000 ml) with nanopure water. Makes 2 liters.
   b) Use the designated filter/vacuum flask, a filter funnel, a clean 0.45um membrane filter, and a large magnetic stir bar to degas the eluent. Pour the eluent into the filter funnel and turn on the vacuum. Set the magnetic sticker at medium to high speed. Once all the eluent has been filtered, keep the vacuum and magnetic stirrer on for 15-20 minutes, allowing the eluent to degas.
   c) Turn off the magnetic stirrer and the vacuum. Remove the filter funnel. Carefully decant the degassed eluent into the eluent bottle, without aerating. Make sure the cap is on tightly, and the tubes are securely attached.

2) Whenever new eluent is prepared, new **regenerant** must also be made.
   a) Prepare 2 liters of a final anion regenerant concentration of 72 mN Sulfuric Acid by adding one Dionex Anion Regenerant Concentrate bottle (P/N 057559) to two liters of nanopure water.
   b) Mix in the regenerant in the designated filter flask using the stir bar and degas for 15-20 minutes.
   c) Turn off the magnetic stirrer and the vacuum. Remove the filter funnel. Carefully decant the degassed regenerant into the REGEN bottle, without aerating. Make sure the cap is on tightly, and the tubes are securely attached.

DX-80 OPERATION

1) Turn on nitrogen gas cylinder (main knob only), autosampler (rear right hand corner), ion analyzer (rear panel right hand side) and computer.

2) Double click on Peaknet to open computer program. **File – Panels\Dionex DX-80 System** for the Control Panel.

3) Under the DX-80 Status click on **CONNECT** to connect analyzer to computer

4) Turn on the pump by clicking the **ON** button on the DX-80 Control Panel. **Prime** the pump by turning the pump head waste valve knob counter clockwise and leaving it open for about 5 seconds. Close the pump valve knob by turning clockwise until secure. After changing to new eluent, it is a good idea to leave pump valve open until all air bubbles have been purged – look for the air bubbles coming out the eluent bottle until it reaches the waste line at the pump. This will allow any air bubbles to be pumped to waste instead of through the columns.
5) Allow the system to **equilibrate** for 30 minutes minimum, generally one hour if new eluent is used. Once ready, the **operating pressure** should be 2000+- 300 psi (usu 2100

psi); and the operating **total conductivity** background should be < 30 uS (usually 25.00uS). You can offset the background and zero the reading by clicking the Autozero button on the Control Panel.

6) To begin a run, create a sequence worksheet by clicking on **File – New – Sequence**. (May have to do this twice if worksheet is not already open.)
   a. It will then prompt you to choose Standard or Unknowns. Choose **Unknowns - Next**
   b. Skip **next** screen where it prompts you to specify timebase,
   c. **Estimate** number of unknowns (you can always add or delete samples from sequence when done.
   d. Fill out file name you wish to save the file We save under ***MMDDYEAR*** and **initials**: *(05052002tl)* and press **enter**.
   e. Press **Done** when prompted to exit wizard.
   f. A worksheet will appear where sample identifications can be added after the calibration data (line #5). Follow printed worksheet – first include a *blank, ic low, ic high, lrb*, then the samples. Note for the first set, the lrb is listed as a sample. *Duplicate spikes* are required for every 10th sample or a minimum of 10% of samples. Finish off sequence with a known quality control standard, usually a proficiency standard such as *WS 60* or Ultra QC and another blank (LRB).
   g. Change *dilution factor* if sample was diluted; default is one. Save by pressing the SAVE icon (floppy disk).

7) To start the run – click on **Batch – Edit – Add** – double click on the newly created sequence, or the one you want run – then **Start** to begin.

8) Make sure autosampler vials are in order and the green light is on 'Run' not 'Hold'.

9) Record date, total conductivity and pressure in the log notebook at which the run has started.

10) During or after the run, verify that the blank and QCs (IC HIGH, IC LOW, IC CHECK) are within range. If not stop the run by clicking on **Batch – Stop - after current sample**, and notify principal analyst to investigate and solve the problem before resuming the run.

REPORTING RESULTS

1) When run is complete the analyst performing the run is responsible for recording and reporting results. Review each chromatogram to verify that the peaks were properly identified. Retention times may shift if there was a sudden change in pressure. Changes to the peak name can be made by a right click on the peak and choosing the correct analyte then save.

2) The results are found on the worksheet next to the sample ID and can be exported to an excel file for accuracy calculation:
   a) Click on any sample cell – i.e. ic low, cell will be outlined.

b) Click on **File – Batch Report – Export** (unclick the Printout option- computer is not connected to any printer) – **Excel file format**
c) For sheets to be exported, choose <u>only</u> " **Summary – INJ vs. Area, Ht, Amt**." Unclick the Integration, Calibration, Peak analysis, Summary-INJ vs. Anion, and Audit Trail options as they are extra and rarely needed for our purpose.
d) Click on **Finish** then **OK** on batch menu. Status will appear and when transfer is complete, press **OK** to exit.

3) To copy exported file onto a floppy, right click on Start icon on lower left screen and choose EXPLORE for Windows Explorer. Under **C:\Chromel\Export** folders are the files just exported. Highlight the correct sequence and drag to **A:** drive to copy file. (Make sure you have a floppy disk inserted).

4) Open exported file under an EXCEL program – the instrument computer does not have one so use a network computer. You will see three types of charts: first- Sample vs. Area, second - Sample vs. Height, and third - Sample vs. Amount. Copy all of the **Sample vs. Amount** table to an old/previous excel file.

5) The Excel Results worksheet is permanently saved under **G:\Laboratory\Data\Water\IC Data\2002** under the correct month. It is also saved in Tess' computer under **C:\My Documents\IC Data** and correct year and month. Easiest way to create the worksheet is to open a previously saved file (of the same year and month) and then cut and paste the data. There are two worksheets in each file, one for the complete results, the other for the raw data (the Sample vs Amount table exported from peaknet).
a) Before any changes are made, save the file under a new name: MMDDYY and initials
b) On RAW worksheet, delete old table and replace with recently ran sequence data. Add a column between Sample ID and Fluoride Amount for the dilution factor.
c) Change Date Analyzed and Analyst if applicable. Calibrations are generally done once a month with the most recent noted under Date of Calibration – change if necessary.
d) **Copy** and paste data results from raw worksheet onto Results worksheet under correct sample name. Use the **Paste Special option – Values** - to retain similar fonts on results worksheet. **% Recoveries** will be automatically calculated as will **% Differences**, and **Averages** for the duplicate spikes but references to certain cells may need to be changed for the correct result.
e) Verify that all QC are accurate before entering into labworks.

6) For drinking water, results should be recorded as ND – Not Detected for levels below DLR (Detection Limit for Reporting) as follows:
a) Fluoride 0.1 mg/L
b) Nitrate 2.0 mg/L
c) Sulfate 0.5 mg/L
d) Bromide 0.1 mg/L
e) Chloride, Nitrite, Phosphate 1.0 mg/L

f) Any samples with readings above the calibration range (20 mg/L fluoride, 100 mg/l chloride, nitrite, bromide, nitrate, sulfate, and 200 mg/l phosphate) needs to be diluted and repeated in the next run. List these samples on a new worksheet with the appropriate dilution and place the worksheet on the clipboard.

7) Do not report results if control/spike values do not fall within limits (refer to section on quality control). If controls, spikes, etc. are out of range, notify the principal analyst. If controls are within limits, date and initial the worksheet and give the worksheet to the clerk for data entry. When the worksheet and backlog are returned place them in the binder.

SHUT DOWN

After the run is complete the Ion Analyzer can be shut down. The IC should be shut down on weekends if the system is not in operation on Friday night so as not to damage the suppressor unit:

1) On the Control Panel screen of Peaknet - turn **OFF** pump and **DISCONNECT** DX-80
2) Close Peaknet.
3) Turn off DX-80, autosampler and close nitrogen cylinder valve.

PREVENTIVE MAINTENANCE:

1) Each quarter, replace the bed supports on guard column
2) Maintain the following spare parts. These items are considered consumables:
   a) Anion Refill Kit (Part No. 057069) contains 4 bottles each of AS14A eluent and anion regenerant concentrate.
   b) AS14A anion separator column, 3 mm (Part No. 056901)
   c) AS14G anion guard column (Part No. 056899)
   d) AMMS III suppressor (Part No. 056751)
   e) DS5 Detection Stabilizer (Part No. 057290T)

DOS AND DON'TS

* Try to make additions, changes, and deletions to the sequence during the middle of a run and then save immediately. If the changes are not saved immediately, the program may get confused on which sequence to use and will freeze. If this happens, wait until the current sample is completed, turn off all equipment and wait for about 15 minutes before restarting.

* Be gentle when loading samples onto the autosampler, especially the first rack. If racks are installed too roughly, conveyor belt may get stuck and samples will not be injected in the proper sequence.

REFERENCES:

1) DX-80 Ion Chromatograph with SRS Control Operator's Manual, Dionex Corporation, 2002.
2) Methods for the Determination of Inorganic Substances in Environmental Samples, Method Number 300.0, Determination of Inorganic Anions by Ion Chromatography, John D. Pfaff, U.S. Environmental Protection Agency, 1993.
3) Standard Methods, 18th Edition, 1992. Part 4110.

Originally written by: Johanna Rosen for DX-100
Date: 12-96
Updated by: Theresa Lam for DX-80 Ion Analyzer
Date: 05-02

Approved by: ____________________________
(Lab Director's signature)

Chapter 7
Appendix 7-C

MCWRA's Chloride Data Contouring Protocols

WATER RESOURCES AGENCY

M E M O R A N D U M

Monterey County

DATE: April 17, 2018

FROM: Sean Noble

TO: Water Quality

SUBJECT: How to Contour SWI in ArcGIS

Background

The purpose of this memo is to describe the process of creating the initial seawater intrusion contours using ArcGIS. This is an attempt to standardize the process. Contours are based on chloride (Cl) data sampled from coastal wells in the Pressure 400-Foot and Pressure 180-Foot Aquifers. This data for comes from three primary sources. First, coastal wells are sampled twice each summer by Agency staff. Second, monitoring wells are sampled once each summer, using a portable pump. Finally, data from outside sources are pulled in to supplement the data and create better geospatial coverage. Historically contours are generated on every odd year, using even year data to fill any data gaps. Data is used to create contours that are then added to the historical seawater intrusion maps. The maps are as follows:

P180 Sea Water Intrusion Map
P400 Sea Water Intrusion Map

(In the future the deep aquifer may be added to the process)

After reviewing all the data and uploading it to the WRAIMS database, we are ready to move on to ArcGIS.

**** The 2017 year Pressure 400 will be used as an example ****

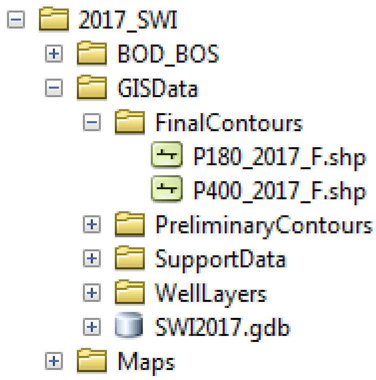
ArcCatalog

Open ArcCatalog and navigate to R:\Workspace\Common\WaterQuality\SWI. Notice that the folders are labeled by year with the exception of the CommonDirectories. This folder stores GIS data that can be used for any year that is contoured. It contains commonly used boundaries, databases, and layers.

In ArcCatalog copy/paste folder of the last year contoured (2015_SWI) and rename current year (2017_SWI).

This will be the naming convention for naming files:

Aquifer_Year _Version(if applicable), examples:



Within each year there are two main folders:

GISData

FinalContours, storage of approved shapefiles

PreliminaryContours – primary exported contour shapefiles

SupportData – secondary export shapefiles, database tables, and imagery

Maps

Stores final project maps and products

<u>ArcMap</u>

<u>Step 1 – Project Formatting</u>

Rename the ArcMap contour projects stored in the Maps folder:

R:\Workspace\Common\WaterQuality\SWI\2017_SWI\Maps**P400_2015.mxd** ->
R:\Workspace\Common\WaterQuality\SWI\2017_SWI\Maps**P400_2017.mxd**

By using the previous project, all of the background shapefiles can stay and be reused for the new project.

<u>Step 2 – Database Formatting</u>

Navigate to:
R:\Workspace\Common\WaterQuality\SWI\CommonDirectories\Databases
And open the **SWIContours (Current).mdb** database
First, make sure that all relevant data has been reviewed and loaded to WRAIMS. Open the **_Contouring_Start_** table and edit the year to the year being contoured.

Run the macro: **SWI_ContourTables**

The macro SWI_ContourTables runs four make table queries to produce these tables:

SWI180_ALL
SWI400_ALL
SWI_180_CONTOUR_WELLS

SWI_400_CONTOUR_WELLS

The '…_ALL' tables include all wells that are in the Monthly Water Quality program and in the appropriate aquifers. Some wells have the aquifer designation PRESSURE BOTH. These well are included in both '…_ALL' tables, but are not included in the contouring. The '…_CONTOUR_WELLS' tables are a subsection of the '…_ALL' tables and only include wells to be used in contouring for the respective aquifers.

If certain wells need to be excluded, modify the **tblExcludedWells** table. Wells are excluded based on facility code and aquifer (180 or 400), so make sure both of those fields are filled out correctly. This table is used dictate which wells are excluded and to document which wells have been excluded and why. It should be kept updated as changes to the dataset are made. After adding new wells to tblExcludedWells, rerun the macros to update the tables.

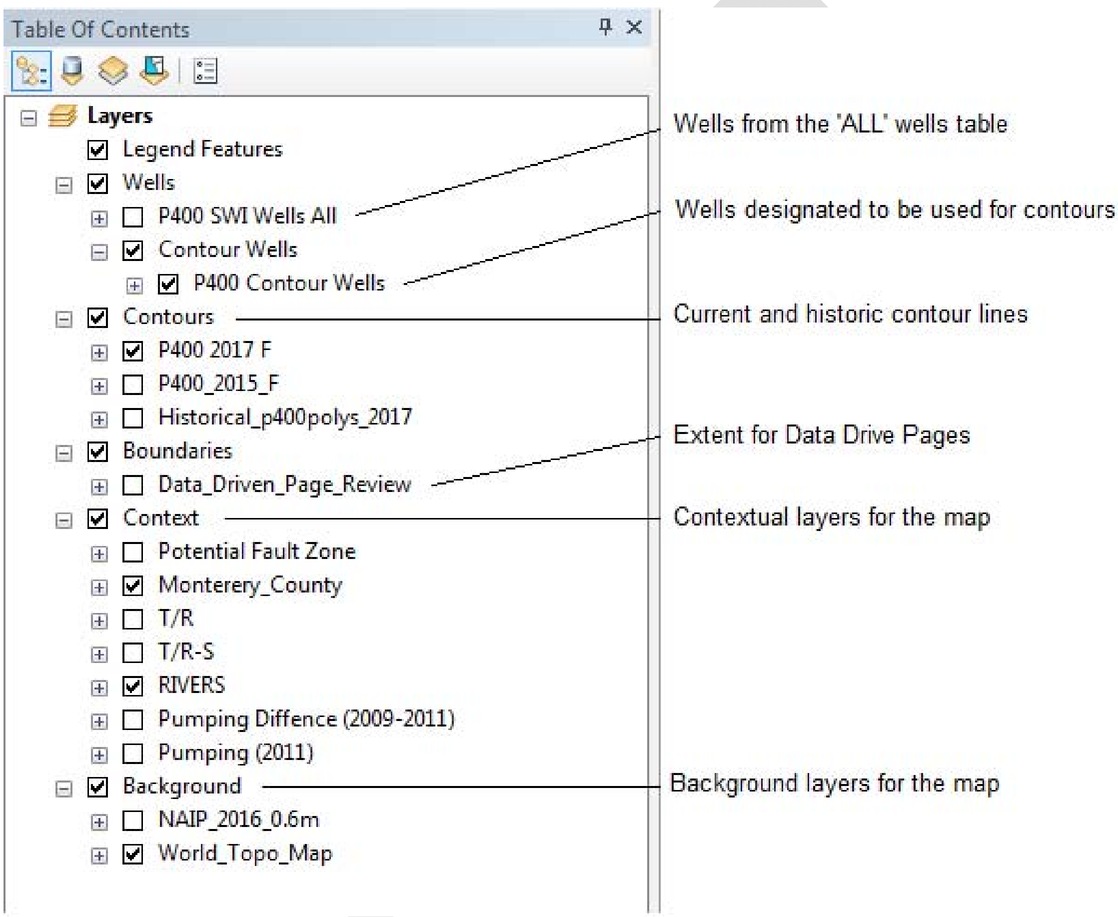
The **ExternalData** table can be used to add data that is not stored in WRAIMS but has been approved to be used for contouring. In the 2017 example, the data from the Monterey Peninsula Water Supply Project monitoring wells was added this way. Only wells with a FACILITY_CODE and in the WellsAll GIS layer can be utilized in this manner (R:\Workspace\Common\MapElements\WellsAll.lyr).

The tables include both present and past measurements and automatically include data from the previous year if the current year is missing data.

Field Name	Description
FACILITY_CODE	Facility Code of the well
FACILITY_NAME	State Well ID based on township and range
BASIN_NAME	Aquifer designation
ContourValue	Value used to contour as a year average of all samples taken during the most recent year
ContourValYr	Year that the value used to contour was sampled
ConYrCl	Contour year average of Cl data
ConYrStDev	Contour year standard deviation of Cl data
1yrBackCl	Previous year average of Cl data (2016)
1YrStDev	Previous year standard deviation of Cl data (2016)
2yrBackCl	Two years prior average of Cl data (2015)
2YrStDev	Two years prior standard deviation of Cl data (2015)
3yrBackCl	Three years prior average of Cl data (2014)
3YrStDev	Three years prior standard deviation of Cl data (2014)
PERF_START	Start of recorded perforation in well casing
PERF_END	End of recorded perforation in well casing
Use	Abbreviation of the wells primary uses
WATER_USE_DESCRIPTION	Description of the wells primary uses
FACILITY_STATUS_NAME	The status of the well

Step 3 – Data Labeling & Symbology

In ArcGIS:
All of the well layers in the ArcMap projects should automatically update to the 'Current' database values. The projects should be laid out in similar formats as demonstrated below. Compare the values and dates of various wells with recorded values in WRAIMS to ensure the correct data is being used.



Step 4 – Draft 1

To generate profiles run the tool
ArcToolbox -> SWIContouringTools -> SWI_Spline_Coastal_Contouring

And fill out the fields

Contour Wells:	Wells\Contour Wells\P180 Contour Wells
Z value field:	SWI_400_CONTOUR_WELLS.ContourValue
Spline type:	TENSION
Number of points:	4
Weight:	0.01

Contour Output:

R:\Workspace\Common\WaterQuality\SWI\2017_SWI\GISData\PreliminaryContours\p400_2017_v1.shp

In Layout view change any labels and titles to match the current year and draft, and make any appropriate changes to the legends.

Export to PDF, R:\Workspace\Common\WaterQuality\SWI\2017_SWI\GISData\PreliminaryContours\p400_2017_V1.pdf. From PDF, print to 11x17 and review. If all the data is there and the labels and symbology are correct then Print to Plotter, 30x30.

Steps Summary

Version 1 is the computers attempt to contour the data based on all the data that has been collected and reviewed for the appropriate aquifer. The next set of versions are created through careful examination of the data to establish what wells will be excluded from the contouring. Use past exclusion to help with wells with ambiguous aquifer designations and refer to well logs, well measurement histories, piper diagrams, and sample notes for wells that don't seem to fit the general trend. Once the list of wells to exclude is agreed upon, run the tool again. This process is iterated until **tblExcludedWells** is agreed to be final by the project supervisor. The next step is to generate the last set of computer generated lines (AT_2017_F) and edit them to match previous contours and represent the general trend of seawater intrusion.

Editing Contour Lines

The computer generated AT_2017_F needs to stay intact incase it has to be referenced at some point. The first thing to do is copy/paste AT_2017_F into the R:\Workspace\Common\WaterQuality\SWI\2017_SWI\GISData\FinalContours folder (this will be the version you edit). In ArcGIS:

Right click on the layer you wish to edit
Go to **Edit Features**
Click **Start Editing**

It sometimes makes editing easier to make the edited layer the only selectable layer.

Right click on layer
Go to **Selection**
Click on **Make This The Only Selectable Layer**

Double-click on the contour line you wish to modify. Many vertices will appear on the line as boxes. These are the points to drag in order to modify the line. When adding lines remember to edit the attribute table to add the appropriate contour value. Due to the limited data the contours will have to be heavily edited to achieve a general representation of sea water intrusion into the aquifers. As a general rule, lines will not recede approved by the project lead. Unless otherwise directed, lines that are seaward of past contours will default to the furthest inland historical extent (use the historical contour lines). Judgement will have to be used to decide how to alter lines to represent general seawater intrusion: work with the project lead on hand kriging and editing.

Final Clean Up

Once the list of excluded wells has been finalized copy the “Current” database and rename it with the contour year. This creates a backup and documents which wells were used and what values. Similarly, ensure that all shape files are in the correct places and properly labeled, especially the final contours.

Chapter 7
Appendix 7-D

DDW and ILRP Wells in the Water Quality Monitoring Network

Eastside Aquifer DDW Wells								
Well ID	Water System Name	Well Screen Info			Coordinates		Monitoring Date Range	
		Top of Screen Depth (ft bgs)	Bottom of Screen Depth (ft bgs)	Screen Length (ft)	Latitude (NAD83)	Longitude (NAD83)	First Year	Last Year
2710010-006	CWSC SALINAS	120	342	222	36.674646	-121.641308	3/8/1983	6/2/2020
2710010-014	CWSC SALINAS	420	489	69	36.702703	-121.631074	4/6/1982	6/4/2020
2710010-018	CWSC SALINAS	305	560	255	36.67812	-121.630138	6/8/1982	6/2/2020
2710010-036	CWSC SALINAS	108	588	480	36.724453	-121.646347	9/3/1982	10/29/1997
2710010-037	CWSC SALINAS	310	630	320	36.732742	-121.651104	9/3/1982	5/12/2020
2710010-005	CWSC SALINAS	380	530	150	36.702521	-121.651601	11/24/1982	6/4/2020
2710001-002	ALCO WATER SERVICE	0	200	200	36.682351	-121.613503	12/27/1982	6/16/2020
2710001-003	ALCO WATER SERVICE	NA	NA	NA	36.666667	-121.6	12/27/1982	12/2/1988
2710001-004	ALCO WATER SERVICE	393	693	300	36.690427	-121.626143	12/27/1982	4/7/2020
2710001-005	ALCO WATER SERVICE	298	446	148	36.686647	-121.623846	12/27/1982	9/24/2002
2710010-024	CWSC SALINAS	380	530	150	36.709899	-121.632764	1/11/1983	1/29/2020
2710010-008	CWSC SALINAS	475	534	59	36.698581	-121.64737	3/23/1983	6/4/2020
2710010-022	CWSC SALINAS	398	600	202	36.715479	-121.659602	4/12/1983	6/4/2020
2710010-039	CWSC SALINAS	320	680	360	36.725017	-121.658218	9/19/1984	9/11/2014
2710010-029	CWSC SALINAS	360	610	250	36.659359	-121.605977	5/15/1985	6/2/2020
2700736-001	N/A	NA	NA	NA	36.74	-121.61	7/31/1986	6/5/2002
2701201-001	N/A	NA	NA	NA	36.67	-121.61	8/1/1986	8/1/1986
2700651-001	MIDDLEFIELD RD WS #02	NA	NA	NA	36.75	-121.61	8/8/1986	9/8/2003
2701188-001	CHUALAR CANYON WS #01	NA	NA	NA	36.58	-121.47	8/8/1986	9/5/2003
2701989-001	N/A	412	457	45	36.51	-121.44	8/14/1986	8/19/2003
2700653-001	MIDDLEFIELD RD WS #04	NA	NA	NA	36.75	-121.61	8/28/1986	7/8/2009
2700856-001	ALTMAN PLANTS WS #01	NA	NA	NA	36.629722	-121.539166	9/4/1986	6/30/2020
2701685-001	N/A	NA	NA	NA	36.74	-121.68	9/4/1986	5/8/2002
2701589-001	SUNNY ACRES MWS	NA	NA	NA	36.591944	-121.448333	9/11/1986	1/12/2010
2701241-001	ENCINAL RD WS #01	NA	NA	NA	36.621805	-121.504444	9/12/1986	6/22/2020
2702017-001	OLD STAGE RD WS #14	NA	NA	NA	36.61	-121.53	9/12/1986	7/16/2003
2700652-001	MIDDLEFIELD RD WS #03	NA	NA	NA	36.756111	-121.614166	10/15/1986	9/4/2003
2700508-001	EL CAMINO REAL WS #34	NA	NA	NA	36.748888	-121.659722	3/18/1987	3/18/1987
2701433-001	HARRISON RD WS #02	NA	NA	NA	36.75	-121.65	3/24/1987	5/19/2004
2701456-001	NATIVIDAD RD WS #03	NA	NA	NA	36.73	-121.6	4/6/1987	4/24/2002
2700797-001	N/A	NA	NA	NA	36.73	-121.65	4/13/1987	4/13/1987
2701570-001	LOS CARNEROS MWA	274		60	36.731194	-121.616694	4/14/1987	7/9/2020
2701716-001	UTO GREENHOUSE WS	NA	NA	NA	36.62	-121.54	4/22/1987	4/22/1987
2702161-001	KOHARA NURSERY WS	NA	NA	NA	36.63	-121.54	4/22/1987	3/20/2017
2701986-001	N/A	NA	NA	NA	36.7	-121.58	#N/A	#N/A
2700560-001	EL CAMINO REAL WS #01	NA	NA	NA	36.74	-121.66	5/5/1987	5/5/1987
2700805-001	WHITE RD WS #01	NA	NA	NA	36.74	-121.65	5/7/1987	5/7/1987
2710007-005	GONZALES, CITY OF	450	650	200	36.518136	-121.438029	4/4/1988	4/7/2020
2710001-001	ALCO WATER SERVICE	310	750	440	36.685299	-121.6042	12/2/1988	4/21/2020
2710010-031	CWSC SALINAS	373	533	160	36.700569	-121.619676	3/31/1989	5/12/1997
2710010-040	CWSC SALINAS	380	600	220	36.717772	-121.649131	3/8/1991	4/18/2002
2710010-041	CWSC SALINAS	420	640	220	36.711972	-121.649291	4/12/1991	4/21/2020

2710001-011	ALCO WATER SERVICE	300	620	320	36.696275	-121.614339	6/11/1991	11/12/2019
2710001-012	ALCO WATER SERVICE	315	585	270	36.702895	-121.602928	6/11/1991	12/11/2013
2710010-043	CWSC SALINAS	470	620	150	36.761095	-121.613937	9/15/1992	5/12/2020
2710001-007	ALCO WATER SERVICE	310	660	350	36.682388	-121.609249	9/29/1993	9/10/2019
2710010-042	CWSC SALINAS	390	720	330	36.762991	-121.612317	1/13/1994	7/10/2008
2710001-013	ALCO WATER SERVICE	330	705	375	36.696271	-121.611211	7/18/1994	11/5/2019
2710001-021	ALCO WATER SERVICE	0	435	435	36.688889	-121.605806	7/24/2000	9/3/2019
2700853-001	COLOR SPOT NURSERY WS #01	420	600	180	36.731805	-121.674777	1/14/2002	6/29/2020
2702475-001	FREE WILL BAPTIST CHURCH WS	245	285	40	36.704166	-121.582416	4/1/2002	4/3/2020
2701931-001	MATSUI NURSERY WS	NA	NA	NA	36.619	-121.51881	4/22/2002	1/29/2003
2710010-046	CWSC SALINAS	415	475	60	36.703158	-121.630944	4/29/2002	6/4/2020
2702202-001	GROWERS COMPANY INC WS	481	526	45	36.607132	-121.551939	9/30/2002	6/23/2020
2700586-008	GABILAN WC	470	480	10	36.755744	-121.617767	3/5/2003	11/7/2019
2700586-003	GABILAN WC	390	712	322	36.751514	-121.621272	3/21/2003	11/7/2019
2700851-001	MONTEREY ROSES WS	0	250	250	36.73875	-121.677972	3/27/2003	3/4/2019
2701946-001	MISIONERO VEGETABLES WS	605	869	264	36.503055	-121.389583	4/30/2003	6/16/2020
2700766-001	STRAWBERRY RD WS #06	200	235	35	36.731806	-121.674778	6/16/2003	6/29/2020
2701068-001	IVERSON & JACKS APTS WS	NA	NA	NA	36.558194	-121.473333	8/19/2003	12/5/2019
2702254-002	PACIFIC VALLEY SCHOOL WS	25	60	35	36.662478	-121.55277	8/22/2003	8/23/2018
2701589-006	SUNNY ACRES MWS	145	265	120	36.591339	-121.449735	9/10/2003	1/21/2020
2701922-001	NATIVIDAD RD WS #02	350	470	120	36.731194	-121.616694	3/26/2007	12/16/2019
2702572-001	ALBA WS	600	800	200	36.609024	-121.533436	12/30/2003	10/15/2019
2701151-001	GREEN VALLEY FLORAL WS	512	600	88	36.623277	-121.531111	2/16/2005	12/17/2019
2700853-002	COLOR SPOT NURSERY WS #01	NA	NA	NA	36.736847	-121.674944	3/10/2004	3/10/2004
2701931-002	MATSUI NURSERY WS	NA	NA	NA	36.621388	-121.526111	5/6/2004	3/20/2020
2710001-022	ALCO WATER SERVICE	NA	NA	NA	36.682419	-121.601629	8/17/2004	2/6/2020
2710010-104	CWSC SALINAS	0	40	40	36.731753	-121.631144	2/1/2006	6/3/2020
2710010-106	CWSC SALINAS	0	340	340	36.704925	-121.654683	11/28/2006	6/4/2020
2702259-004	LHOIST NORTH AMERICA WS	260	500	240	36.740583	-121.609417	12/9/2011	5/26/2020
2710010-103	CWSC SALINAS	0	170	170	36.665164	-121.616581	5/14/2007	2/5/2020
2710010-123	CWSC SALINAS	NA	NA	NA	36.691472	-121.646736	7/21/2008	6/4/2020
2702544-001	SANCTUARY BIBLE CHURCH WS	50	50	0	36.752944	-121.656306	12/2/2008	12/20/2018
2702537-001	PREMIUM PACKING WS	36	420	384	36.752944	-121.656305	4/19/2010	12/4/2019
2701904-006	SAN JERARDO COOP WS	NA	NA	NA	36.661995	-121.55335	6/22/2011	6/22/2020
2702626-001	JOHNSON CYN WS #01	NA	NA	NA	36.536109	-121.402603	2/24/2011	3/21/2018
2701946-004	MISIONERO VEGETABLES WS	NA	NA	NA	36.503025	-121.39	#N/A	#N/A
2701068-003	IVERSON & JACKS APTS WS	NA	NA	NA	36.558162	-121.473489	#N/A	#N/A
2703132-001	CYPRESS MANUFACTURING CO WS	NA	NA	NA	36.656465	-121.559881	#N/A	#N/A
2710010-132	CWSC SALINAS	NA	NA	NA	36.725	-121.658262	3/2/2017	6/4/2020
2704623-001	TOP INDUSTRIES WS	NA	NA	NA	36.657719	-121.558443	#N/A	#N/A
2700147-001	FLRISH FARMS WS	NA	NA	NA	36.622482	-121.517793	#N/A	#N/A
2708852-001	FAITH AND FAMILY FARMS WS	NA	NA	NA	36.6306	-121.5683	#N/A	#N/A

2700236-001	GREEN VALLEY FLORAL-OSR WS	NA	NA	NA	36.761415	-121.606952	#N/A	#N/A
2706552-001	ALVAREZ BROTHERS WS	NA	NA	NA	36.621472	-121.504413	#N/A	#N/A
2700101-001	PACIFIC RESERVE NURSERY WS	NA	NA	NA	36.63227	-121.566254	#N/A	#N/A
2702681-001	HARTNELL RD WS #01	NA	NA	NA	36.634058	-121.583792	#N/A	#N/A
2701144-001	MONTEREY BOTANICALS WS	NA	NA	NA	36.633089	-121.568972	6/27/2019	6/18/2020
2701144-002	MONTEREY BOTANICALS WS	NA	NA	NA	36.633041	-121.569082	#N/A	#N/A

Eastside Aquifer ILRP Wells								
		Well Screen Info			Coordinates		Monitoring Date Range	
Well ID	Well Type	Top of Screen Depth (ft bgs)	Bottom of Screen Depth (ft bgs)	Screen Length (ft)	Latitude (NAD83)	Longitude (NAD83)	First Year	Last Year
AGL020004022-GABILAN W1	IRRIGATION SUPPLY	NA	NA	NA	36.63109	-121.54245	2/15/2012	6/26/2019
AGL020004022-GABILAN W2	ON-FARM DOMESTIC	NA	NA	NA	36.63084	-121.5405	2/15/2012	4/10/2018
AGL020003194-D-1	ON-FARM DOMESTIC	NA	NA	NA	36.638369	-121.561246	2/21/2012	1/23/2014
AGL020001931-BARD 1	IRRIGATION SUPPLY	NA	NA	NA	36.64101	-121.54236	3/27/2012	9/25/2019
AGL020001931-BARD 5	IRRIGATION SUPPLY	NA	NA	NA	36.63737	-121.52864	3/27/2012	11/29/2017
AGL020004432-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.73182	-121.674797	7/11/2012	9/10/2014
AGL020004437-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.73879	-121.678011	7/11/2012	9/10/2014
AGL020002130-WELL 1	ON-FARM DOMESTIC	NA	NA	NA	36.657753	-121.558457	9/11/2012	3/25/2013
AGL020010824-DANNYS 2	IRRIGATION SUPPLY	NA	NA	NA	36.5794444	-121.476111	9/17/2012	12/13/2017
AGL020012464-R15-D	ON-FARM DOMESTIC	NA	NA	NA	36.6324	-121.586467	9/21/2012	4/27/2018
AGL020001514-AG_WELL_FS	IRRIGATION SUPPLY	NA	NA	NA	36.6230365	-121.50012	10/8/2012	9/7/2017
AGL020012883-AG_WELL_PR	IRRIGATION SUPPLY	NA	NA	NA	36.6112562	-121.546125	10/8/2012	4/26/2018
AGL020001463-WELL 1	IRRIGATION SUPPLY	NA	NA	NA	36.62035	-121.50708	10/23/2012	10/31/2017
AGL020010824-DANNYS OHB	ON-FARM DOMESTIC	NA	NA	NA	36.584142	-121.455054	10/29/2012	9/13/2018
AGL020010825-CYPRESS OHB	ON-FARM DOMESTIC	NA	NA	NA	36.5505333	-121.4442	10/29/2012	9/13/2018
AGL020010826-SANTA LUCIA	IRRIGATION SUPPLY	NA	NA	NA	36.5488889	-121.435556	10/29/2012	12/13/2017
AGL020007533-GH20-07	IRRIGATION SUPPLY	NA	NA	NA	36.64583	-121.60663	10/31/2012	6/8/2020
AGL020004722-AG_WELL_RE	IRRIGATION SUPPLY	NA	NA	NA	36.6253667	-121.529617	11/26/2012	11/1/2017
AGL020007884-AG_WELL_EN	IRRIGATION SUPPLY	NA	NA	NA	36.6276167	-121.544883	11/26/2012	5/1/2017
AGL020004343-AIRPORT	IRRIGATION SUPPLY	NA	NA	NA	36.6497222	-121.607222	11/27/2012	6/3/2013
AGL020004147-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.61941	-121.5111	11/29/2012	1/18/2018
AGL020004151-SUGARLOAF1	IRRIGATION SUPPLY	NA	NA	NA	36.76125	-121.607267	11/29/2012	1/18/2018
AGL020000993-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.62369	-121.55146	12/11/2012	10/31/2017

AGL020003975-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.627418	-121.548295	12/11/2012	6/13/2013
AGL020013763-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.636733	-121.56564	12/11/2012	6/13/2013
AGL020014770-WELL #3	IRRIGATION SUPPLY	NA	NA	NA	36.577431	-121.474754	12/11/2012	11/1/2017
AGL020018723-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.644598	-121.581714	12/11/2012	6/13/2013
AGL020014792-WELL #1	IRRIGATION SUPPLY	NA	NA	NA	36.561589	-121.482461	12/17/2012	9/8/2014
AGL020018262-AG_WELL_YG	IRRIGATION SUPPLY	NA	NA	NA	36.6276167	-121.544883	12/18/2012	5/28/2013
AGL020016442-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.619951	-121.515187	1/4/2013	6/13/2013
AGL020017603-GH18-02	IRRIGATION SUPPLY	NA	NA	NA	36.64718	-121.54213	1/14/2013	6/9/2020
AGL020014956-GH23-10	IRRIGATION SUPPLY	NA	NA	NA	36.57867	-121.47543	4/3/2013	9/9/2016
AGL020000570-DUAL_SV	ON-FARM DOMESTIC	NA	NA	NA	36.6242	-121.552617	5/13/2013	10/9/2017
AGL020004182-AG_HOME5	IRRIGATION SUPPLY	NA	NA	NA	36.54112	-121.475354	9/5/2013	6/7/2019
AGL020004182-DOM_HOHOUS	ON-FARM DOMESTIC	NA	NA	NA	36.542001	-121.481524	9/5/2013	6/7/2019
AGL020015522-AG_SARG7	IRRIGATION SUPPLY	NA	NA	NA	36.545853	-121.481145	9/5/2013	6/7/2019
AGL020015522-DOM_SAHOUS	ON-FARM DOMESTIC	NA	NA	NA	36.547153	-121.482899	9/5/2013	6/7/2019
AGL020003246-WELL 1	IRRIGATION SUPPLY	NA	NA	NA	36.687517	-121.575367	9/11/2013	3/17/2015
AGL020003250-WELL 2	IRRIGATION SUPPLY	NA	NA	NA	36.72785	-121.6097	9/11/2013	3/29/2017
AGL020015364-NORT_WELL2	IRRIGATION SUPPLY	NA	NA	NA	36.65815	-121.5939	9/27/2013	9/27/2013
AGL020015364-NORT_WELL3	IRRIGATION SUPPLY	NA	NA	NA	36.6554167	-121.596533	9/27/2013	9/27/2013
AGL020007450-EN2-1	IRRIGATION SUPPLY	NA	NA	NA	36.6197111	-121.5056	10/2/2013	4/27/2018
AGL020007454-FL-1	IRRIGATION SUPPLY	NA	NA	NA	36.638545	-121.565872	10/2/2013	4/27/2018
AGL020002888-R14-W4	IRRIGATION SUPPLY	NA	NA	NA	36.6030694	-121.537225	10/10/2013	4/27/2018
AGL020002889-R15-W6	IRRIGATION SUPPLY	NA	NA	NA	36.6427056	-121.591447	10/10/2013	4/27/2018
AGL020002900-R22-W7	IRRIGATION SUPPLY	NA	NA	NA	36.6760194	-121.573917	10/10/2013	4/27/2018
AGL020012464-R15-W4	IRRIGATION SUPPLY	NA	NA	NA	36.6407667	-121.587658	10/10/2013	4/27/2018
AGL020012465-R22-W1	IRRIGATION SUPPLY	NA	NA	NA	36.65975	-121.565731	10/10/2013	4/27/2018
AGL020002895-R18 W1	IRRIGATION SUPPLY	NA	NA	NA	36.5577139	-121.472036	10/17/2013	4/26/2018
AGL020012502-R7A W20	IRRIGATION SUPPLY	NA	NA	NA	36.538725	-121.425306	10/17/2013	4/26/2018
AGL020020062-R23 W1	IRRIGATION SUPPLY	NA	NA	NA	36.5384889	-121.450228	10/17/2013	4/12/2017
AGL020002880-R7 W14	IRRIGATION SUPPLY	NA	NA	NA	36.5121889	-121.426736	10/18/2013	4/26/2018
AGL020012443-R7S W6	IRRIGATION SUPPLY	NA	NA	NA	36.510125	-121.425192	10/18/2013	4/26/2018
AGL020012444-R7N W3	IRRIGATION SUPPLY	NA	NA	NA	36.5166417	-121.432819	10/18/2013	10/18/2013

AGC100000001-CCGC_0005	ON-FARM DOMESTIC	NA	NA	NA	36.5491	-121.488467	10/21/2013	10/21/2013
AGC100000001-CCGC_0007	ON-FARM DOMESTIC	NA	NA	NA	36.6308	-121.540333	10/21/2013	10/21/2013
AGC100000001-CCGC_0009	ON-FARM DOMESTIC	NA	NA	NA	36.635133	-121.5614	10/21/2013	10/21/2013
AGC100000001-CCGC_0017	ON-FARM DOMESTIC	NA	NA	NA	36.60658	-121.52071	10/21/2013	10/21/2013
AGC100000001-CCGC_0018	ON-FARM DOMESTIC	NA	NA	NA	36.63261	-121.52438	10/21/2013	10/21/2013
AGC100000001-CCGC_0004	ON-FARM DOMESTIC	NA	NA	NA	36.73119	-121.61673	10/22/2013	10/22/2013
AGC100000001-CCGC_0033	ON-FARM DOMESTIC	NA	NA	NA	36.691783	-121.6326	10/22/2013	10/22/2013
AGC100000001-CCGC_0034	ON-FARM DOMESTIC	NA	NA	NA	36.690333	-121.6335	10/22/2013	10/22/2013
AGC100000001-CCGC_0055	ON-FARM DOMESTIC	NA	NA	NA	36.520983	-121.452533	10/23/2013	10/23/2013
AGC100000001-CCGC_0021	IRRIGATION SUPPLY	NA	NA	NA	36.5385	-121.4502	10/25/2013	10/25/2013
AGC100000001-CCGC_0022	IRRIGATION SUPPLY	NA	NA	NA	36.53843	-121.45171	10/25/2013	10/25/2013
AGL020017603-GH18-01	IRRIGATION SUPPLY	NA	NA	NA	36.64893	-121.54208	11/7/2013	6/8/2020
AGL020017603-GH18-03	IRRIGATION SUPPLY	NA	NA	NA	36.64512	-121.54215	11/7/2013	6/8/2020
AGL020017982-DOM WELL	ON-FARM DOMESTIC	NA	NA	NA	36.749871	-121.668102	11/26/2013	8/14/2014
AGL020017982-IRR WELL	IRRIGATION SUPPLY	NA	NA	NA	36.742805	-121.674099	11/26/2013	8/14/2014
AGL020020702-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.7244719	-121.663394	11/26/2013	8/14/2014
AGL020002963-AG_JCHIN1	IRRIGATION SUPPLY	NA	NA	NA	36.6100333	-121.561517	12/3/2013	9/24/2019
AGL020002973-AG_OLDSTA1	IRRIGATION SUPPLY	NA	NA	NA	36.5548833	-121.4965	12/3/2013	10/9/2019
AGL020001178-HOUSE LOT 20	ON-FARM DOMESTIC	NA	NA	NA	36.586296	-121.492043	12/12/2013	11/1/2016
AGL020001178-JOHNSON WELL 4	IRRIGATION SUPPLY	NA	NA	NA	36.585575	-121.500153	12/12/2013	11/1/2016
AGL020001277-BASSI HSE LOT 3	ON-FARM DOMESTIC	NA	NA	NA	36.524956	-121.458969	12/12/2013	3/13/2014
AGL020001277-HOUSE LOT 9	ON-FARM DOMESTIC	NA	NA	NA	36.526634	-121.450104	12/12/2013	3/13/2014
AGL020001277-BASSI WELL 1	IRRIGATION SUPPLY	NA	NA	NA	36.523376	-121.460358	12/13/2013	3/13/2014
AGL020001211-FANOE WELL 1	IRRIGATION SUPPLY	NA	NA	NA	36.534321	-121.456459	12/17/2013	3/14/2014
AGL020004824-AG WELL 2	IRRIGATION SUPPLY	NA	NA	NA	36.62464	-121.55317	12/26/2013	11/19/2018
AGL020009222-AG WELL 1	IRRIGATION SUPPLY	NA	NA	NA	36.66982	-121.57456	12/26/2013	12/28/2018
AGL020004819-DM WELL 1	ON-FARM DOMESTIC	NA	NA	NA	36.59243	-121.49605	12/27/2013	5/23/2014
AGL020004850-AG WELL 3	IRRIGATION SUPPLY	NA	NA	NA	36.61548	-121.53085	12/27/2013	6/12/2017
AGL020004912-AG WELL 2	IRRIGATION SUPPLY	NA	NA	NA	36.61215	-121.54781	12/27/2013	11/19/2018
AGL020004885-AG WELL 5	ON-FARM DOMESTIC	NA	NA	NA	36.62151	-121.51525	1/8/2014	11/19/2018
AGL020021563-WELL21_IRR	IRRIGATION SUPPLY	NA	NA	NA	36.72409	-121.66303	1/10/2014	6/7/2018

AGL020021582-PENNY_IRR	IRRIGATION SUPPLY	NA	NA	NA	36.74167	-121.63139	1/23/2014	6/7/2018
AGL020007181-WELL #1	IRRIGATION SUPPLY	NA	NA	NA	36.66508	-121.55793	2/20/2014	4/24/2018
AGL020004256-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.611589	-121.543716	2/25/2014	10/13/2014
AGL020004280-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.631395	-121.567806	2/25/2014	10/13/2014
AGC100000001-CCGC_0107	ON-FARM DOMESTIC	NA	NA	NA	36.65544	-121.58747	3/10/2014	3/10/2014
AGC100000001-CCGC_0115	ON-FARM DOMESTIC	NA	NA	NA	36.69945	-121.59572	3/11/2014	3/11/2014
AGC100000001-CCGC_0116	ON-FARM DOMESTIC	NA	NA	NA	36.63356	-121.56477	3/11/2014	3/11/2014
AGC100000001-CCGC_0121	ON-FARM DOMESTIC	NA	NA	NA	36.71994	-121.62272	3/12/2014	3/12/2014
AGC100000001-CCGC_0124	ON-FARM DOMESTIC	NA	NA	NA	36.72677	-121.64327	3/12/2014	3/12/2014
AGC100000001-CCGC_0125	ON-FARM DOMESTIC	NA	NA	NA	36.7298	-121.62845	3/12/2014	3/12/2014
AGC100000001-CCGC_0178	ON-FARM DOMESTIC	NA	NA	NA	36.75096	-121.60908	3/12/2014	8/27/2014
AGC100000001-CCGC_0138	IRRIGATION SUPPLY	NA	NA	NA	36.61798	-121.5584	3/14/2014	3/14/2014
AGC100000001-CCGC_0139	ON-FARM DOMESTIC	NA	NA	NA	36.62739	-121.54842	3/14/2014	3/14/2014
AGC100000001-CCGC_0140	ON-FARM DOMESTIC	NA	NA	NA	36.63852	-121.56055	3/14/2014	3/14/2014
AGC100000001-CCGC_0141	ON-FARM DOMESTIC	NA	NA	NA	36.63689	-121.55285	3/14/2014	3/14/2014
AGC100000001-CCGC_0194	ON-FARM DOMESTIC	NA	NA	NA	36.60785	-121.52083	3/19/2014	3/19/2014
AGC100000001-CCGC_0198	ON-FARM DOMESTIC	NA	NA	NA	36.5919	-121.46027	3/19/2014	3/19/2014
AGL020004432-AG WELL	IRRIGATION SUPPLY	NA	NA	NA	36.73688	-121.675019	4/4/2014	9/10/2014
AGL020021802-QUAIL RUN WELL	IRRIGATION SUPPLY	NA	NA	NA	36.5444444	-121.439167	4/7/2014	6/1/2017
AGL020004246-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.629927	-121.54037	4/11/2014	3/28/2018
AGL020004261-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.621827	-121.557998	4/11/2014	3/28/2018
AGL020023982-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.629605	-121.548195	4/11/2014	3/28/2018
AGC100000001-CCGC_0365	ON-FARM DOMESTIC	NA	NA	NA	36.74264	-121.62765	4/29/2014	8/27/2015
AGL020004005-HANS_HOME	IRRIGATION SUPPLY	NA	NA	NA	36.67817	-121.58338	5/21/2014	5/17/2018
AGL020004005-JACKS_ORG	IRRIGATION SUPPLY	NA	NA	NA	36.68292	-121.5928	5/21/2014	5/17/2018
AGL020004005-JACKS_VAR	IRRIGATION SUPPLY	NA	NA	NA	36.67986	-121.58688	5/21/2014	5/17/2018
AGL020004005-HANS_CORNE	IRRIGATION SUPPLY	NA	NA	NA	36.67787	-121.58435	5/22/2014	5/17/2018
AGL020007671-AG WELL	IRRIGATION SUPPLY	NA	NA	NA	36.6180555	-121.520833	5/22/2014	12/9/2019
AGL020007671-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.6180055	-121.520833	5/22/2014	2/20/2018
AGL020004151-SUGARLOAF2	IRRIGATION SUPPLY	NA	NA	NA	36.7616	-121.6068	5/23/2014	5/23/2014
AGL020004147-UCHIDA	IRRIGATION SUPPLY	NA	NA	NA	36.6196667	-121.5102	5/29/2014	3/3/2015
AGL020007449-AG_ENC1	IRRIGATION SUPPLY	NA	NA	NA	36.6197111	-121.5056	6/12/2014	4/27/2018

AGL020013665-WELL #4	IRRIGATION SUPPLY	NA	NA	NA	36.73178	-121.67239	6/18/2014	3/25/2019
AGC100000001-CCGC_0397	ON-FARM DOMESTIC	NA	NA	NA	36.60813	-121.49184	8/7/2014	8/7/2014
AGC100000001-CCGC_0400	ON-FARM DOMESTIC	NA	NA	NA	36.74305	-121.66261	8/7/2014	8/7/2014
AGC100000001-CCGC_0401	ON-FARM DOMESTIC	NA	NA	NA	36.73947	-121.67248	8/7/2014	8/7/2014
AGC100000001-CCGC_0402	ON-FARM DOMESTIC	NA	NA	NA	36.61847	-121.51647	8/7/2014	8/7/2014
AGC100000001-CCGC_0403	ON-FARM DOMESTIC	NA	NA	NA	36.59862	-121.51294	8/7/2014	8/7/2014
AGC100000001-CCGC_0433	ON-FARM DOMESTIC	NA	NA	NA	36.5052	-121.41582	8/8/2014	8/8/2014
AGC100000001-CCGC_0471	ON-FARM DOMESTIC	NA	NA	NA	36.73577	-121.66159	8/27/2014	8/27/2014
AGC100000001-CCGC_0473	ON-FARM DOMESTIC	NA	NA	NA	36.70657	-121.589	8/27/2014	8/27/2014
AGC100000001-CCGC_0474	ON-FARM DOMESTIC	NA	NA	NA	36.62089	-121.5757	8/27/2014	8/27/2014
AGC100000001-CCGC_0476	ON-FARM DOMESTIC	NA	NA	NA	36.63828	-121.56315	8/28/2014	8/28/2014
AGC100000001-CCGC_0477	ON-FARM DOMESTIC	NA	NA	NA	36.66046	-121.54945	8/28/2014	8/28/2014
AGC100000001-CCGC_0496	ON-FARM DOMESTIC	NA	NA	NA	36.57366	-121.46053	8/28/2014	8/28/2014
AGL020005502-WELL_2	IRRIGATION SUPPLY	NA	NA	NA	36.5965167	-121.43825	9/4/2014	9/4/2014
AGL020014770-WELL D	ON-FARM DOMESTIC	NA	NA	NA	36.570351	-121.488014	9/8/2014	11/1/2017
AGL020004005-HANS_NEW	IRRIGATION SUPPLY	NA	NA	NA	36.67757	-121.57877	9/24/2014	5/17/2018
AGL020004243-WELL	ON-FARM DOMESTIC	NA	NA	NA	36.624964	-121.554923	10/13/2014	3/28/2018
AGL020000566-SANTAFE	IRRIGATION SUPPLY	NA	NA	NA	36.619622	-121.559558	10/20/2014	12/8/2014
AGL020026647-AG_DAYTON	IRRIGATION SUPPLY	NA	NA	NA	36.6809806	-121.578983	12/17/2014	4/10/2018
AGL020017603-GH18-DOM	ON-FARM DOMESTIC	NA	NA	NA	36.648264	-121.536709	2/12/2015	6/8/2020
AGL020004850-HOUSE WELL	ON-FARM DOMESTIC	NA	NA	NA	36.61639	-121.54087	3/24/2015	3/24/2015
AGL020004850-SHOP WELL	ON-FARM DOMESTIC	NA	NA	NA	36.6153	-121.52991	3/24/2015	3/24/2015
AGL020017662-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.62916	-121.58512	6/9/2015	7/25/2017
AGL020002880-R7_P4	ON-FARM DOMESTIC	NA	NA	NA	36.5136639	-121.428269	6/22/2015	4/26/2018
AGC100000001-CCGC_0587	ON-FARM DOMESTIC	NA	NA	NA	36.71774	-121.61888	6/24/2015	4/28/2016
AGC100000001-CCGC_0593	ON-FARM DOMESTIC	NA	NA	NA	36.72489	-121.64542	6/24/2015	6/24/2015
AGC100000001-CCGC_0595	ON-FARM DOMESTIC	NA	NA	NA	36.72143	-121.66751	6/30/2015	6/30/2015
AGL020002895-R18_P1	ON-FARM DOMESTIC	NA	NA	NA	36.5576917	-121.472033	7/2/2015	7/2/2015
AGL020012502-R7A_P19	ON-FARM DOMESTIC	NA	NA	NA	36.5369806	-121.427097	8/10/2015	4/26/2018
AGL020016442-BACK_WELL	ON-FARM DOMESTIC	NA	NA	NA	36.61995	-121.515183	8/17/2015	11/1/2017
AGC100000001-CCGC_0628	ON-FARM DOMESTIC	NA	NA	NA	36.66327	-121.54792	8/26/2015	8/26/2015
AGC100000001-CCGC_0634	ON-FARM DOMESTIC	NA	NA	NA	36.72928	-121.62543	8/27/2015	8/27/2015
AGL020004722-DOM_REDWOO	ON-FARM DOMESTIC	NA	NA	NA	36.6232066	-121.531202	12/18/2015	11/1/2017

AGL020027931-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.50188	-121.373882	2/9/2016	4/28/2017
AGC100000001-CCGC_0655	ON-FARM DOMESTIC	NA	NA	NA	36.74295	-121.61804	5/4/2016	5/4/2016
AGC100000001-CCGC_0656	ON-FARM DOMESTIC	NA	NA	NA	36.75008	-121.6258	5/4/2016	5/4/2016
AGL020027223-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.74984	-121.68387	6/14/2016	10/12/2017
AGL020006520-SALA_3	IRRIGATION SUPPLY	NA	NA	NA	36.7624558	-121.618513	6/17/2016	8/29/2017
AGL020027978-AG_SETTRIN	IRRIGATION SUPPLY	NA	NA	NA	36.72105	-121.621417	6/29/2016	8/27/2018
AGL020027893-HOBSON	IRRIGATION SUPPLY	NA	NA	NA	36.551403	-121.45288	7/12/2016	11/6/2017
AGL020027894-METZGER AG	IRRIGATION SUPPLY	NA	NA	NA	36.561962	-121.453583	7/12/2016	7/12/2016
AGL020010824-DANNYS 1	IRRIGATION SUPPLY	NA	NA	NA	36.5819444	-121.478056	7/13/2016	7/13/2016
AGL020010826-DOMESTIC	ON-FARM DOMESTIC	NA	NA	NA	36.550546	-121.444316	7/13/2016	9/11/2018
AGL020027893-HOBSON DOM	ON-FARM DOMESTIC	NA	NA	NA	36.560596	-121.444893	8/17/2016	5/22/2017
AGL020014882-AG3_THOKLE	IRRIGATION SUPPLY	NA	NA	NA	36.7048778	-121.589539	9/26/2016	8/27/2018
AGL020028120-AG_MADALO1	IRRIGATION SUPPLY	NA	NA	NA	36.7070528	-121.628797	9/26/2016	9/14/2017
AGL020028252-WELL 2	IRRIGATION SUPPLY	NA	NA	NA	36.7109	-121.605902	3/29/2017	10/9/2017
AGL020028214-R30_DD_W1	IRRIGATION SUPPLY	NA	NA	NA	36.694572	-121.589526	4/6/2017	4/27/2018
AGL020028238-R8_W1	IRRIGATION SUPPLY	NA	NA	NA	36.55942	-121.484585	4/12/2017	4/26/2018
AGL020008662-WELL #3 AG	IRRIGATION SUPPLY	NA	NA	NA	36.614009	-121.555361	4/20/2017	10/19/2018
AGL020012444-R7-W5	IRRIGATION SUPPLY	NA	NA	NA	36.5226056	-121.434247	4/20/2017	4/26/2018
AGL020008662-WELL #3	ON-FARM DOMESTIC	NA	NA	NA	36.61798	-121.5584	4/20/2017	10/19/2018
AGL020005306-D_ABELOE2	ON-FARM DOMESTIC	NA	NA	NA	36.7426333	-121.627683	4/24/2017	6/4/2018
AGL020000704-BR AGWELL1	IRRIGATION SUPPLY	NA	NA	NA	36.519	-121.4581	5/2/2017	4/15/2019
AGL020000704-CCGC_0055	ON-FARM DOMESTIC	NA	NA	NA	36.519	-121.4481	5/2/2017	4/15/2019
AGL020014882-AG2_THOKLE	IRRIGATION SUPPLY	NA	NA	NA	36.7011889	-121.586486	5/5/2017	10/9/2019
AGL020014362-ESPOS	IRRIGATION SUPPLY	NA	NA	NA	36.5954	-121.5067	5/11/2017	9/26/2017
AGL020014362-ESPRES	IRRIGATION SUPPLY	NA	NA	NA	36.58995	-121.505	5/11/2017	9/26/2017
AGL020014364-WAL	IRRIGATION SUPPLY	NA	NA	NA	36.61374	-121.52029	5/11/2017	9/26/2017
AGL020014362-ESPSHOP	IRRIGATION SUPPLY	NA	NA	NA	36.59859	-121.51311	5/11/2017	9/26/2017
AGL020014364-WAL DOM	IRRIGATION SUPPLY	NA	NA	NA	36.61835	-121.51682	5/11/2017	9/26/2017
AGL020016442-FRONT_DUAL	ON-FARM DOMESTIC	NA	NA	NA	36.6208833	-121.51415	5/22/2017	5/22/2017
AGL020027402-71904	IRRIGATION SUPPLY	NA	NA	NA	36.62106	-121.57554	5/24/2017	12/10/2019
AGL020027402-71905	ON-FARM DOMESTIC	NA	NA	NA	36.62086	-121.57566	5/24/2017	12/10/2019
AGL020001399-#24 OLD	IRRIGATION SUPPLY	NA	NA	NA	36.5733	-121.46	5/29/2017	11/20/2017
AGL020001409-#23 #815	IRRIGATION SUPPLY	NA	NA	NA	36.5831	-121.479	5/29/2017	11/20/2017

AGL020004036-HARRIS_ESP	IRRIGATION SUPPLY	NA	NA	NA	36.62335	-121.53658	5/30/2017	6/26/2019
AGL020004043-HARRIS_HESS	IRRIGATION SUPPLY	NA	NA	NA	36.63433	-121.56137	5/30/2017	5/30/2017
AGL020027616-WELL2_I	IRRIGATION SUPPLY	NA	NA	NA	36.7389	-121.6492	5/30/2017	5/30/2017
AGL020027794-KONDOLOT3_I	IRRIGATION SUPPLY	NA	NA	NA	36.67206	-121.58247	5/30/2017	5/30/2017
AGL020027795-SHOP1_D	ON-FARM DOMESTIC	NA	NA	NA	36.75413	-121.61015	5/30/2017	5/30/2017
AGL020027795-WELL1_I	IRRIGATION SUPPLY	NA	NA	NA	36.75237	-121.61476	5/30/2017	5/30/2017
AGL020027796-PISTLOT1_I	IRRIGATION SUPPLY	NA	NA	NA	36.75617	-121.61038	5/30/2017	5/30/2017
AGL020028235-HOUSEFRONT_I	IRRIGATION SUPPLY	NA	NA	NA	36.69368	-121.58317	5/30/2017	5/30/2017
AGL020028236-VALLYLOT6_I	IRRIGATION SUPPLY	NA	NA	NA	36.76102	-121.60661	5/30/2017	5/30/2017
AGL020028241-HARRIS_TUR	IRRIGATION SUPPLY	NA	NA	NA	36.57953	-121.4761	5/30/2017	5/30/2017
AGL020004022-CCGC_0007	ON-FARM DOMESTIC	280	460	180	36.6308	-121.540333	5/30/2017	6/26/2019
AGL020004043-CCGC_0009	ON-FARM DOMESTIC	NA	NA	NA	36.635133	-121.5614	5/30/2017	6/26/2019
AGL020003927-NORTON_PUMP3	IRRIGATION SUPPLY	NA	NA	NA	36.65543	-121.59648	6/1/2017	6/1/2017
AGL020003927-CCGC_0107	ON-FARM DOMESTIC	NA	NA	NA	36.65544	-121.58747	6/1/2017	5/2/2019
AGL020000973-CCGC_0034	ON-FARM DOMESTIC	NA	NA	NA	36.690333	-121.6335	6/2/2017	6/2/2017
AGL020017982-AG_GULARTE	IRRIGATION SUPPLY	NA	NA	NA	36.7514667	-121.670283	6/5/2017	10/20/2017
AGL020017982-DOM_GULART	ON-FARM DOMESTIC	NA	NA	NA	36.75	-121.667717	6/5/2017	10/20/2017
AGL020001211-FANOE_AG1	IRRIGATION SUPPLY	NA	NA	NA	36.53425	-121.456483	6/6/2017	12/18/2017
AGL020001277-BASSI_AG2	IRRIGATION SUPPLY	NA	NA	NA	36.5252167	-121.4577	6/6/2017	12/18/2017
AGL020001277-BASSI_DOM	ON-FARM DOMESTIC	NA	NA	NA	36.5266333	-121.45015	6/7/2017	12/14/2017
AGL020001281-TURRI3_DUA	ON-FARM DOMESTIC	NA	NA	NA	36.5878667	-121.481317	6/7/2017	12/18/2017
AGL020008307-CCGC_0115	ON-FARM DOMESTIC	NA	NA	NA	36.69945	-121.59572	6/7/2017	6/7/2017
AGL020008307-DUNCAN2_I	IRRIGATION SUPPLY	NA	NA	NA	36.69622	-121.59637	6/7/2017	6/7/2017
AGL020001178-JOHNSON3_D	ON-FARM DOMESTIC	NA	NA	NA	36.5865333	-121.491583	6/7/2017	12/18/2017
AGL020014764-CCGC_0116	ON-FARM DOMESTIC	NA	NA	NA	36.63356	-121.56477	6/7/2017	11/4/2019
AGL020001281-TURRI4_DUA	ON-FARM DOMESTIC	NA	NA	NA	36.5909333	-121.483833	6/8/2017	12/18/2017
AGL020021977-HARTNELL	IRRIGATION SUPPLY	NA	NA	NA	36.671635	-121.600173	6/9/2017	10/11/2017
AGL020022966-DEDAMPIERRE_AG	IRRIGATION SUPPLY	NA	NA	NA	36.696665	-121.590987	6/9/2017	10/31/2019

AGL020027846-SILACCI_1	IRRIGATION SUPPLY	NA	NA	NA	36.687532	-121.575354	6/9/2017	10/11/2017
AGL020001175-CLOSTER_AG	IRRIGATION SUPPLY	NA	NA	NA	36.61445	-121.526	6/13/2017	12/14/2017
AGL020004705-AG WELL	IRRIGATION SUPPLY	NA	NA	NA	36.609409	-121.533813	6/13/2017	11/14/2017
AGL020007284-AG WELL	IRRIGATION SUPPLY	NA	NA	NA	36.72866	-121.6181	6/13/2017	2/12/2019
AGL020008438-R16-11	IRRIGATION SUPPLY	NA	NA	NA	36.5775278	-121.502639	6/14/2017	10/25/2017
AGL020001286-SILACCI_AG	IRRIGATION SUPPLY	NA	NA	NA	36.6058167	-121.5255	6/15/2017	12/18/2017
AGL020001286-SILACCI_D	ON-FARM DOMESTIC	NA	NA	NA	36.60825	-121.5217	6/15/2017	12/14/2017
AGL020027846-SILACCI_2	IRRIGATION SUPPLY	NA	NA	NA	36.693451	-121.580624	6/16/2017	10/11/2017
AGL020028129-THOMPS_AG	IRRIGATION SUPPLY	NA	NA	NA	36.6210275	-121.575541	6/16/2017	10/23/2017
AGL020021982-HICKS_DUAL	ON-FARM DOMESTIC	NA	NA	NA	36.70667	-121.588905	6/21/2017	10/15/2017
AGL020022966-DEDAMPIERRE_D	ON-FARM DOMESTIC	NA	NA	NA	36.70667	-121.588905	6/21/2017	12/4/2017
AGL020028129-THOMPSON_DOM	ON-FARM DOMESTIC	NA	NA	NA	36.6209	-121.575647	6/21/2017	10/15/2017
AGL020013408-WELL_AG_2	IRRIGATION SUPPLY	NA	NA	NA	36.55353	-121.484883	6/25/2017	8/28/2019
AGL020013408-WELL_DOM	ON-FARM DOMESTIC	NA	NA	NA	36.553556	-121.491007	6/25/2017	6/25/2017
AGL020004288-WELL_4_DOM	ON-FARM DOMESTIC	NA	NA	NA	36.6517493	-121.558937	6/27/2017	10/30/2017
AGL020008404-ROTAWING_I	IRRIGATION SUPPLY	NA	NA	NA	36.58448	-121.5052	6/28/2017	7/15/2019
AGL020001399-PO DOM WELL	ON-FARM DOMESTIC	NA	NA	NA	36.578	-121.4581	6/29/2017	11/20/2017
AGL020004067-ZABALA_1	IRRIGATION SUPPLY	NA	NA	NA	36.64537	-121.5671	6/29/2017	6/13/2019
AGL020002817-DOU P2 WELL	IRRIGATION SUPPLY	NA	NA	NA	36.4953	-121.4302	7/21/2017	5/5/2020
AGL020002817-DOU P4 WELL	IRRIGATION SUPPLY	NA	NA	NA	36.5188	-121.4478	7/21/2017	5/5/2020
AGL020002817-DOU P5 WELL	IRRIGATION SUPPLY	NA	NA	NA	36.4959	-121.4286	7/21/2017	5/5/2020
AGL020003049-SPUSDAFD_I	IRRIGATION SUPPLY	NA	NA	NA	36.626	-121.5371	7/26/2017	3/26/2019
AGL020003660-GULARTE_I	IRRIGATION SUPPLY	NA	NA	NA	36.75381	-121.67379	7/26/2017	7/26/2017
AGL020027959-AG_SPENCE	IRRIGATION SUPPLY	NA	NA	NA	36.619418	-121.559517	9/7/2017	4/26/2018
AGL020029030-DOM_WILL	ON-FARM DOMESTIC	NA	NA	NA	36.693608	-121.559517	9/7/2017	9/7/2017
AGL020003194-JMFANOE1_I	IRRIGATION SUPPLY	NA	NA	NA	36.63913	-121.56002	9/28/2017	5/1/2019
AGL020003194-CCGC_0140	ON-FARM DOMESTIC	580	660	80	36.63852	-121.56055	9/28/2017	5/1/2019
AGL020003194-CCGC_0141	ON-FARM DOMESTIC	NA	NA	NA	36.63689	-121.55285	9/28/2017	5/1/2019
AGL020027931-WELL 10	IRRIGATION SUPPLY	NA	NA	NA	36.50251	-121.36902	10/10/2017	10/10/2017

AGL020027931-WELL 2	IRRIGATION SUPPLY	NA	NA	NA	36.50184	-121.37393	10/10/2017	10/10/2017
AGL020004266-JOHNSON_HOME_1	IRRIGATION SUPPLY	NA	NA	NA	36.658668	-121.565752	10/11/2017	10/11/2017
AGL020004266-JOHNSON_HOME_2	IRRIGATION SUPPLY	NA	NA	NA	36.655668	-121.567393	10/11/2017	10/11/2017
AGL020004288-NIXON_1	IRRIGATION SUPPLY	NA	NA	NA	36.647834	-121.558463	10/11/2017	10/11/2017
AGL020004288-NIXON_2	IRRIGATION SUPPLY	NA	NA	NA	36.651674	-121.566736	10/11/2017	10/11/2017
AGL020004288-NIXON_3	IRRIGATION SUPPLY	NA	NA	NA	36.645456	-121.561427	10/11/2017	10/11/2017
AGL020004288-WILSON	IRRIGATION SUPPLY	NA	NA	NA	36.6532	-121.560751	10/11/2017	10/11/2017
AGL020004291-CONNOLLY_1	IRRIGATION SUPPLY	NA	NA	NA	36.619266	-121.513634	10/11/2017	10/11/2017
AGL020004291-CONNOLLY_2	IRRIGATION SUPPLY	NA	NA	NA	36.616457	-121.510295	10/11/2017	10/11/2017
AGL020007284-DOM WELL	ON-FARM DOMESTIC	NA	NA	NA	36.73124	-121.61672	10/17/2017	2/12/2019
AGL020004154-CHRISTL1_I	IRRIGATION SUPPLY	NA	NA	NA	36.7174	-121.62213	10/23/2017	7/29/2019
AGL020004154-CHRISTL7_I	IRRIGATION SUPPLY	NA	NA	NA	36.72025	-121.615	10/23/2017	7/29/2019
AGL020004155-HARDL15_I	IRRIGATION SUPPLY	NA	NA	NA	36.71797	-121.63154	10/23/2017	7/29/2019
AGL020004265-BONDLOT3_I	IRRIGATION SUPPLY	NA	NA	NA	36.72127	-121.63034	10/23/2017	7/29/2019
AGL020004265-BONDPIP5_I	IRRIGATION SUPPLY	NA	NA	NA	36.71999	-121.62256	10/23/2017	7/29/2019
AGL020004269-MOFFL29_I	IRRIGATION SUPPLY	NA	NA	NA	36.71846	-121.6362	10/23/2017	7/29/2019
AGL020004277-MORTLOT1_I	IRRIGATION SUPPLY	NA	NA	NA	36.72768	-121.63203	10/23/2017	7/29/2019
AGL020004284-SMITHL9_I	IRRIGATION SUPPLY	NA	NA	NA	36.72578	-121.63301	10/23/2017	7/29/2019
AGL020004306-WSFARM23_1	IRRIGATION SUPPLY	NA	NA	NA	36.72521	-121.63946	10/23/2017	7/29/2019
AGL020027905-SILACL10_I	IRRIGATION SUPPLY	NA	NA	NA	36.6875	-121.57539	10/23/2017	7/29/2019
AGL020027905-SILACL13_I	IRRIGATION SUPPLY	NA	NA	NA	36.69344	-121.58062	10/23/2017	7/29/2019
AGL020027907-HARTLOT2_I	IRRIGATION SUPPLY	NA	NA	NA	36.67164	-121.60025	10/23/2017	7/29/2019
AGL020030176-BORANDA_AG	IRRIGATION SUPPLY	NA	NA	NA	36.7095222	-121.604044	10/23/2017	11/4/2019
AGL020004265-CCGC_0121	ON-FARM DOMESTIC	NA	NA	NA	36.71994	-121.62272	10/23/2017	7/29/2019
AGL020004284-CCGC_0124	ON-FARM DOMESTIC	119	135	16	36.72677	-121.64327	10/23/2017	7/29/2019
AGL020004154-CCGC_0587	ON-FARM DOMESTIC	NA	NA	NA	36.71774	-121.61888	10/24/2017	7/29/2019
AGL020001926-WATER4_I	IRRIGATION SUPPLY	NA	NA	NA	36.60263	-121.52601	11/1/2017	9/25/2019
AGL020001929-WALTY31_I	IRRIGATION SUPPLY	NA	NA	NA	36.62739	-121.52962	11/1/2017	9/25/2019
AGL020001929-WALTY35_I	IRRIGATION SUPPLY	NA	NA	NA	36.62852	-121.5341	11/1/2017	9/25/2019
AGL020001930-HOMEH1_I	IRRIGATION SUPPLY	NA	NA	NA	36.60202	-121.5308	11/1/2017	9/25/2019
AGL020017542-WILSONK3_I	IRRIGATION SUPPLY	NA	NA	NA	36.57477	-121.4696	11/1/2017	9/25/2019

AGL020017543-LKANTK11_I	IRRIGATION SUPPLY	NA	NA	NA	36.56712	-121.48618	11/1/2017	9/25/2019
AGL020017543-LKANTK19_I	IRRIGATION SUPPLY	NA	NA	NA	36.56666	-121.47599	11/1/2017	11/1/2017
AGL020028007-FCWELL	IRRIGATION SUPPLY	NA	NA	NA	36.52829	-121.418648	11/6/2017	11/6/2017
AGL020004506-CCGC_0433	ON-FARM DOMESTIC	NA	NA	NA	36.5052	-121.41582	11/15/2017	12/11/2019
AGL020004508-JFJENSEN_I	IRRIGATION SUPPLY	NA	NA	NA	36.5099	-121.40999	11/15/2017	12/11/2019
AGL020004516-JFRINCON_I	IRRIGATION SUPPLY	NA	NA	NA	36.54201	-121.43701	11/15/2017	12/11/2019
AGL020001610-WELL 5	IRRIGATION SUPPLY	NA	NA	NA	36.74025	-121.66282	11/20/2017	4/24/2019
AGL020001612-WELL 7	IRRIGATION SUPPLY	NA	NA	NA	36.60439	-121.5019	11/20/2017	4/23/2019
AGL020001613-WELL 9	IRRIGATION SUPPLY	NA	NA	NA	36.60135	-121.49979	11/20/2017	4/23/2019
AGL020001615-WELL 20	IRRIGATION SUPPLY	NA	NA	NA	36.60488	-121.51679	11/20/2017	4/23/2019
AGL020001616-WELL 22	IRRIGATION SUPPLY	NA	NA	NA	36.66948	-121.58737	11/20/2017	4/23/2019
AGL020008553-WELL 14	IRRIGATION SUPPLY	NA	NA	NA	36.59602	-121.50195	11/20/2017	4/23/2019
AGL020008556-WELL 1	IRRIGATION SUPPLY	NA	NA	NA	36.6456	-121.58071	11/20/2017	4/22/2019
AGL020008557-WELL 57	IRRIGATION SUPPLY	NA	NA	NA	36.62008	-121.56532	11/20/2017	4/22/2019
AGL020008558-WELL 55	IRRIGATION SUPPLY	NA	NA	NA	36.62077	-121.56931	11/20/2017	4/22/2019
AGL020008559-WELL 31	IRRIGATION SUPPLY	NA	NA	NA	36.74618	-121.66243	11/20/2017	4/24/2019
AGL020013048-WELL 26	IRRIGATION SUPPLY	NA	NA	NA	36.66392	-121.58099	11/20/2017	4/23/2019
AGL020028412-WELL 1	IRRIGATION SUPPLY	NA	NA	NA	36.65914	-121.5779	11/20/2017	4/22/2019
AGL020027447-DUNCAN_I	IRRIGATION SUPPLY	NA	NA	NA	36.69146	-121.59231	11/28/2017	9/23/2019
AGL020028240-BRAZIL1_I	IRRIGATION SUPPLY	NA	NA	NA	36.72024	-121.60867	11/28/2017	11/28/2017
AGL020028240-BRAZIL2_I	IRRIGATION SUPPLY	NA	NA	NA	36.72249	-121.60513	11/28/2017	9/23/2019
AGL020028240-BRAZIL3_I	IRRIGATION SUPPLY	NA	NA	NA	36.72672	-121.6013	11/28/2017	11/28/2017
AGL020022966-DEDAMPIERRE_D2	ON-FARM DOMESTIC	NA	NA	NA	36.706572	-121.587412	12/4/2017	12/4/2017
AGL020028499-R34_W1	IRRIGATION SUPPLY	NA	NA	NA	36.612011	-121.540847	12/5/2017	4/27/2018
AGL020030107-UCHI_W1	IRRIGATION SUPPLY	NA	NA	NA	36.619509	-121.510794	12/5/2017	4/27/2018
AGL020001206-REEVES DOM	ON-FARM DOMESTIC	NA	NA	NA	36.721463	-121.667596	12/12/2017	5/18/2018
AGL020003819-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.682403	-121.633906	12/12/2017	8/5/2019
AGL020003888-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.684541	-121.646622	12/12/2017	8/5/2019
AGL020003896-WELL	IRRIGATION SUPPLY	NA	NA	NA	36.69044	-121.6451	12/12/2017	8/5/2019
AGL020016042-WELL 1	IRRIGATION SUPPLY	NA	NA	NA	36.690636	-121.642766	12/12/2017	8/5/2019
AGL020028093-DAYTON PRIM	IRRIGATION SUPPLY	NA	NA	NA	36.682339	-121.576548	12/12/2017	5/18/2018
AGL020028098-MALADORA DOM	ON-FARM DOMESTIC	NA	NA	NA	36.721572	-121.622391	12/12/2017	5/19/2020

AGL020000855-CAHOMER_I	IRRIGATION SUPPLY	NA	NA	NA	36.6261	-121.52829	12/19/2017	8/6/2019
AGL020004235-HOLLENSTEI	IRRIGATION SUPPLY	NA	NA	NA	36.7456382	-121.642105	12/19/2017	5/29/2018
AGL020005304-BLANCO PRI #1	IRRIGATION SUPPLY	NA	NA	NA	36.747662	-121.618175	12/19/2017	6/4/2018
AGL020005305-SALA DUAL	ON-FARM DOMESTIC	NA	NA	NA	36.745684	-121.652928	12/19/2017	6/4/2018
AGL020005306-#3 ABELOE PRI	IRRIGATION SUPPLY	NA	NA	NA	36.73894	-121.629268	12/19/2017	6/4/2018
AGL020005307-MARCI PRI #2	IRRIGATION SUPPLY	NA	NA	NA	36.7442	-121.61652	12/19/2017	6/4/2018
AGL020005308-CODIROLI #2 PRI	IRRIGATION SUPPLY	NA	NA	NA	36.711062	-121.605873	12/19/2017	6/4/2018
AGL020014625-KR_IRR_DIESEL	IRRIGATION SUPPLY	NA	NA	NA	36.729953	-121.623686	12/19/2017	1/23/2020
AGL020014625-KR_IRR_ELECTRIC	IRRIGATION SUPPLY	NA	NA	NA	36.729302	-121.625396	12/19/2017	1/23/2020
AGL020021083-#1 YOSHIDAPRI	IRRIGATION SUPPLY	NA	NA	NA	36.738268	-121.611719	12/19/2017	6/4/2018
AGL020023942-MUTHER PRI#1	IRRIGATION SUPPLY	NA	NA	NA	36.750961	-121.628263	12/19/2017	6/4/2018
AGL020028098-MALADORA PRI	IRRIGATION SUPPLY	NA	NA	NA	36.723727	-121.628852	12/19/2017	5/18/2018
AGL020028408-BULLVINE_I	IRRIGATION SUPPLY	NA	NA	NA	36.57663	-121.47901	12/19/2017	9/25/2019
AGL020029885-BARCELLOS PRI	IRRIGATION SUPPLY	NA	NA	NA	36.727852	-121.609739	12/19/2017	6/4/2018
AGL020000855-CCGC_0018	ON-FARM DOMESTIC	NA	NA	NA	36.63261	-121.52438	12/19/2017	8/6/2019
AGL020005304-BLANCO DOM	ON-FARM DOMESTIC	NA	NA	NA	36.743742	-121.617775	12/19/2017	6/4/2018
AGL020023942-MUTHER DOM	ON-FARM DOMESTIC	NA	NA	NA	36.75069	-121.627652	12/19/2017	6/4/2018
AGL020027986-AG WELL	IRRIGATION SUPPLY	NA	NA	NA	36.572412	-121.491643	12/27/2017	4/13/2018
AGL020005502-WELL_1_AG	IRRIGATION SUPPLY	NA	NA	NA	36.5962861	-121.438144	2/2/2018	2/2/2018
AGL020004057-HOME_1	IRRIGATION SUPPLY	NA	NA	NA	36.64031	-121.56126	3/15/2018	6/13/2019
AGL020004057-HOME_DOM	ON-FARM DOMESTIC	NA	NA	NA	36.63828	-121.56315	3/15/2018	6/13/2019
AGL020004061-GARCIA_1	IRRIGATION SUPPLY	NA	NA	NA	36.64418	-121.56773	3/15/2018	6/13/2019
AGL020032821-AMEZQUIT_I	IRRIGATION SUPPLY	NA	NA	NA	36.70679	-121.5955	3/27/2018	3/27/2018
AGL020000973-LOT 10	IRRIGATION SUPPLY	NA	NA	NA	36.69005	-121.63031	4/27/2018	4/8/2019
AGL020000972-BROOME1AG	IRRIGATION SUPPLY	NA	NA	NA	36.53853	-121.47894	4/27/2018	4/8/2019
AGL020027738-AIRPORT	IRRIGATION SUPPLY	NA	NA	NA	36.64977	-121.60748	5/17/2018	11/12/2018
AGL020030209-NORTON	IRRIGATION SUPPLY	NA	NA	NA	36.65495	-121.58771	5/17/2018	11/12/2018

AGL020030205-LHR IRR	IRRIGATION SUPPLY	NA	NA	NA	36.54875	-121.4549	5/18/2018	5/18/2018
AGL020026647-DAYTON_AG1	IRRIGATION SUPPLY	NA	NA	NA	36.6835833	-121.581433	8/28/2018	10/9/2019
AGL020026647-DAYTON_AG2	IRRIGATION SUPPLY	NA	NA	NA	36.6822222	-121.576667	8/28/2018	10/9/2019
AGL020013895-ANDER2_I	IRRIGATION SUPPLY	NA	NA	NA	36.74601	-121.61258	10/30/2018	10/30/2018
AGL020013895-ANDER4_D	ON-FARM DOMESTIC	NA	NA	NA	36.75094	-121.60906	10/30/2018	10/30/2018
AGL020035430-MARTINEZ	IRRIGATION SUPPLY	NA	NA	NA	36.75005	-121.65959	11/12/2018	10/28/2019
AGL020036602-MARTINEZ	IRRIGATION SUPPLY	NA	NA	NA	36.75005	-121.65959	11/12/2018	10/28/2019
AGL020001610-WELL 17	ON-FARM DOMESTIC	NA	NA	NA	36.73943	-121.67252	11/27/2018	6/18/2019
AGL020001612-WELL 14	ON-FARM DOMESTIC	NA	NA	NA	36.60813	-121.49182	11/27/2018	6/18/2019
AGL020008559-WELL 18	ON-FARM DOMESTIC	NA	NA	NA	36.74315	-121.6627	11/27/2018	6/18/2019
AGL020032864-AG WELL	IRRIGATION SUPPLY	NA	NA	NA	36.55073	-121.473744	12/4/2018	8/28/2019
AGL020032864-DOM WELL	ON-FARM DOMESTIC	NA	NA	NA	36.552303	-121.475298	12/11/2018	9/23/2019
AGL020032804-GULARTE_AG	IRRIGATION SUPPLY	NA	NA	NA	36.75368	-121.67381	3/29/2019	3/29/2019
AGL020000973-DOM	ON-FARM DOMESTIC	NA	NA	NA	36.690333	-121.6335	4/8/2019	4/8/2019
AGL020030113-MFPOTT3_I	IRRIGATION SUPPLY	NA	NA	NA	36.61554	-121.53085	5/2/2019	5/2/2019
AGL020030113-MFPOTTER_D	ON-FARM DOMESTIC	NA	NA	NA	36.61536	-121.52961	5/2/2019	5/2/2019
AGL020013895-CCGC_0178	ON-FARM DOMESTIC	NA	NA	NA	36.75096	-121.60908	7/29/2019	7/29/2019
AGL020004306-CCGC_0593	ON-FARM DOMESTIC	NA	NA	NA	36.72489	-121.64542	7/31/2019	7/31/2019
AGL020013407-WELL_DOM	ON-FARM DOMESTIC	NA	NA	NA	36.5537	-121.491	10/31/2019	10/31/2019
AGL020036603-PISTA_AG	IRRIGATION SUPPLY	NA	NA	NA	36.76097	-121.60664	11/18/2019	11/18/2019
AGL020036604-GREENHOUSE	IRRIGATION SUPPLY	NA	NA	NA	36.69362	-121.58309	11/18/2019	11/18/2019
AGL020035672-KL-W1	IRRIGATION SUPPLY	NA	NA	NA	36.67364	-121.579602	12/10/2019	12/10/2019
AGL020035672-KL-W2	IRRIGATION SUPPLY	NA	NA	NA	36.672119	-121.582464	12/10/2019	12/10/2019
AGL020036043-LAMACCHIA_DOM	ON-FARM DOMESTIC	NA	NA	NA	36.5208333	-121.3775	12/11/2019	12/11/2019
AGL020036047-ABEL_DOM	ON-FARM DOMESTIC	NA	NA	NA	36.5194444	-121.371944	12/11/2019	12/11/2019
AGL020037470-GH27-01	ON-FARM DOMESTIC	NA	NA	NA	36.5701	-121.4886	3/27/2020	6/8/2020
AGL020037470-GH27-DOM	ON-FARM DOMESTIC	NA	NA	NA	36.5704	-121.4889	3/27/2020	6/8/2020
AGL020036645-AMARAL_IW	IRRIGATION SUPPLY	NA	NA	NA	36.541865	-121.46546	5/21/2020	5/21/2020

Chapter 7
Appendix 7-E

Central Coast Ag Order 3.0 **and Ag Order 4.0**
Monitoring and Reporting Program

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

MONITORING AND REPORTING PROGRAM
ORDER NO. R3-2017-0002-01

TIER 1

DISCHARGERS ENROLLED UNDER
CONDITIONAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR
DISCHARGES FROM IRRIGATED LANDS

This Monitoring and Reporting Program Order No. R3-2017-0002-01 (MRP) is issued pursuant to California Water Code (Water Code) sections 13267 and 13269, which authorize the California Regional Water Quality Control Board, Central Coast Region (hereafter Central Coast Water Board) to require preparation and submittal of technical and monitoring reports. Water Code section 13269 requires a waiver of waste discharge requirements to include as a condition the performance of monitoring and the public availability of monitoring results. *Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands*, Order No. R3-2017-0002 (Order) includes criteria and requirements for three tiers. This MRP sets forth monitoring and reporting requirements for **Tier 1 Dischargers** enrolled under the Order. A summary of the requirements is shown below.

SUMMARY OF MONITORING AND REPORTING REQUIREMENTS FOR TIER 1:

Part 1: Surface Receiving Water Monitoring and Reporting *(cooperative or individual)*
Part 2: Groundwater Monitoring and Reporting *(cooperative or individual)*

Pursuant to Water Code section 13269(a)(2), monitoring requirements must be designed to support the development and implementation of the waiver program, including, but not limited to, verifying the adequacy and effectiveness of the waiver's conditions. The monitoring and reports required by this MRP are to evaluate effects of discharges of waste from irrigated agricultural operations and individual farms/ranches on waters of the state and to determine compliance with the Order.

MONITORING AND REPORTING BASED ON TIERS

The Order and MRP include criteria and requirements for three tiers, based upon those characteristics of individual farms/ranches at the operation that present the highest level of waste discharge or greatest risk to water quality. Dischargers must meet conditions of the Order and MRP for the appropriate tier that applies to their land and/or the individual farm/ranch. Within a tier, Dischargers comply with requirements based on the specific level of discharge and threat to water quality from individual farms/ranches. The lowest tier, Tier 1, applies to dischargers who discharge the lowest level of waste (amount or concentration) or pose the lowest potential to cause or contribute to an exceedance of water quality standards in waters of the State or of the United States. The highest tier, Tier 3, applies to dischargers who discharge the highest level of waste or pose the greatest potential to cause or contribute to an exceedance of water quality standards in waters of the State or of the United States. Tier 2 applies to dischargers whose discharge has a moderate threat to water quality. Water quality is defined in terms of regional, state, or federal numeric or narrative water quality standards. Per the Order, Dischargers may submit a request to the Executive Officer to approve transfer to a lower tier. If the Executive Officer approves a transfer to a lower tier, any interested person may request that the Central Coast Water Board conduct a review of the Executive Officer's determination.

PART 1. SURFACE RECEIVING WATER MONITORING AND REPORTING REQUIREMENTS

The surface receiving water monitoring and reporting requirements described herein are generally a continuation of the surface receiving water monitoring and reporting requirements of Monitoring and Reporting Program Order No. 2012-0011-01, as revised August 22, 2016, with the intent of uninterrupted regular monitoring and reporting during the transition from Order No. R3-2012-0011-01 to Order No. R3-2017-0002-01.

Monitoring and reporting requirements for surface receiving water identified in Part 1.A. and Part 1.B. apply to Tier 1 Dischargers. Surface receiving water refers to water flowing in creeks and other surface waters of the State. Surface receiving water monitoring may be conducted through a cooperative monitoring program on behalf of Dischargers, or Dischargers may choose to conduct surface receiving water monitoring and reporting individually. Key monitoring and reporting requirements for surface receiving water are shown in Tables 1 and 2.

A. Surface Receiving Water Quality Monitoring

1. Dischargers must elect a surface receiving water monitoring option (cooperative monitoring program or individual receiving water monitoring) to comply with surface receiving water quality monitoring requirements, and identify the option selected on the Notice of Intent (NOI).

2. Dischargers are encouraged to choose participation in a cooperative monitoring program (e.g., the existing Cooperative Monitoring Program or a similar program) to comply with receiving water quality monitoring requirements. Dischargers not participating in a cooperative monitoring program must conduct surface receiving water quality monitoring individually that achieves the same purpose.

3. Dischargers (individually or as part of a cooperative monitoring program) must conduct surface receiving water quality monitoring to a) assess the impacts of their waste discharges from irrigated lands to receiving water, b) assess the status of receiving water quality and beneficial use protection in impaired waterbodies dominated by irrigated agricultural activity, c) evaluate status, short term patterns and long term trends (five to ten years or more) in receiving water quality, d) evaluate water quality impacts resulting from agricultural discharges (including but not limited to tile drain discharges), e) evaluate stormwater quality, f) evaluate condition of existing perennial, intermittent, or ephemeral streams or riparian or wetland area habitat, including degradation resulting from erosion or agricultural discharges of waste, and g) assist in the identification of specific sources of water quality problems.

<u>Surface Receiving Water Quality Sampling and Analysis Plan</u>

4. **By March 1, 2018, or as directed by the Executive Officer**, Dischargers (individually or as part of a cooperative monitoring program) must submit a surface receiving water quality Sampling and Analysis Plan (SAAP) and Quality Assurance Project Plan (QAPP); this requirement is satisfied if an approved SAAP and QAPP addressing all surface receiving water quality monitoring requirements described in this Order has been submitted pursuant to Order No. R3-2012-0011 and associated Monitoring and Reporting Programs. Dischargers (or a third party cooperative monitoring program) must develop the Sampling and Analysis Plan to describe how the proposed monitoring will achieve the objectives of the MRP and evaluate compliance with the Order. The Sampling and Analysis Plan may propose alternative monitoring site locations, adjusted monitoring parameters, and other changes as necessary to assess the impacts of waste discharges from irrigated lands to receiving water. The Executive Officer must approve the Sampling and Analysis Plan and QAPP.

5. The Sampling and Analysis Plan must include the following minimum required components:
    a. Monitoring strategy to achieve objectives of the Order and MRP;
    b. Map of monitoring sites with GIS coordinates;
    c. Identification of known water quality impairments and impaired waterbodies per the 2010 Clean Water Act 303(d) List of Impaired Waterbodies (List of Impaired Waterbodies);
    d. Identification of beneficial uses and applicable water quality standards;
    e. Identification of applicable Total Maximum Daily Loads;
    f. Monitoring parameters;
    g. Monitoring schedule, including description and frequencies of monitoring events;

h. Description of data analysis methods;

6. The QAPP must include receiving water and site-specific information, project organization and responsibilities, and quality assurance components of the MRP. The QAPP must also include the laboratory and field requirements to be used for analyses and data evaluation. The QAPP must contain adequate detail for project and Water Board staff to identify and assess the technical and quality objectives, measurement and data acquisition methods, and limitations of the data generated under the surface receiving water quality monitoring. All sampling and laboratory methodologies and QAPP content must be consistent with U.S. EPA methods, State Water Board's Surface Water Ambient Monitoring Program (SWAMP) protocols and the Central Coast Water Board's Central Coast Ambient Monitoring Program (CCAMP). Following U.S. EPA guidelines[1] and SWAMP templates[2], the receiving water quality monitoring QAPP must include the following minimum required components:
   a. Project Management. This component addresses basic project management, including the project history and objectives, roles and responsibilities of the participants, and other aspects.
   b. Data Generation and Acquisition. This component addresses all aspects of project design and implementation. Implementation of these elements ensures that appropriate methods for sampling, measurement and analysis, data collection or generation, data handling, and quality control activities are employed and are properly documented. Quality control requirements are applicable to all the constituents sampled as part of the MRP, as described in the appropriate method.
   c. Assessment and Oversight. This component addresses the activities for assessing the effectiveness of the implementation of the project and associated QA and QC activities. The purpose of the assessment is to provide project oversight that will ensure that the QA Project Plan is implemented as prescribed.
   d. Data Validation and Usability. This component addresses the quality assurance activities that occur after the data collection, laboratory analysis and data generation phase of the project is completed. Implementation of these elements ensures that the data conform to the specified criteria, thus achieving the MRP objectives.

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[1] USEPA. 2001 (2006) USEPA Requirements for Quality Assurance Project Plans (QA/R-5) Office of Environmental Information, Washington, D.C. USEPA QA/R-5
[2] http://waterboards.ca.gov/water_issues/programs/swamp/tools.shtml#qa

7. The Central Coast Water Board may conduct an audit of contracted laboratories at any time in order to evaluate compliance with the QAPP.

8. The Sampling and Analysis Plan and QAPP, and any proposed revisions are subject to approval by the Executive Officer. The Executive Officer may also revise the Sampling and Analysis Plan, including adding, removing, or changing monitoring site locations, changing monitoring parameters, and other changes as necessary to assess the impacts of waste discharges from irrigated lands to receiving water.

Surface Receiving Water Quality Monitoring Sites

9. The Sampling and Analysis Plan must, at a minimum, include monitoring sites to evaluate waterbodies identified in Table 1, unless otherwise approved by the Executive Officer. The Sampling and Analysis Plan must include sites to evaluate receiving water quality impacts most directly resulting from areas of agricultural discharge (including areas receiving tile drain discharges). Site selection must take into consideration the existence of any long term monitoring sites included in related monitoring programs (e.g. CCAMP and the existing CMP). Sites may be added or modified, subject to prior approval by the Executive Officer, to better assess the pollutant loading from individual sources or the impacts to receiving waters caused by individual discharges. Any modifications must consider sampling consistency for purposes of trend evaluation.

Surface Receiving Water Quality Monitoring Parameters

10. The Sampling and Analysis Plan must, at a minimum, include the following types of monitoring and evaluation parameters listed below and identified in Table 2:

    a. Flow Monitoring;
    b. Water Quality (physical parameters, metals, nutrients, pesticides);
    c. Toxicity (water and sediment);
    d. Assessment of Benthic Invertebrates.

11. All analyses must be conducted at a laboratory certified for such analyses by the State Department of Public Health (CDPH) or at laboratories approved by the Executive Officer. Unless otherwise noted, all sampling, sample preservation, and analyses must be performed in accordance with the latest edition of *Test Methods for Evaluating Solid Waste*, SW-846, U.S. EPA, and analyzed as specified herein by the above analytical methods and reporting limits indicated. Certified laboratories can be found at the web link: http://www.cdph.ca.gov/certlic/labs/Documents/ELAPLablist.xls

12. Water quality and flow monitoring is used to assess the sources, concentrations, and loads of waste discharges from individual farms/ranches and groups of Dischargers to surface waters, to evaluate impacts to water quality and beneficial uses, and to evaluate the short term patterns and long term trends in receiving water quality. Monitoring data must be compared to existing numeric and narrative water quality objectives.

13. Toxicity testing is to evaluate water quality relative to the narrative toxicity objective. Water column toxicity analyses must be conducted on 100% (undiluted) sample. At sites where persistent unresolved toxicity is found, the Executive Officer may require concurrent toxicity and chemical analyses and a Toxicity Identification Evaluation (TIE) to identify the individual discharges causing the toxicity.

<u>Surface Receiving Water Quality Monitoring Frequency and Schedule</u>

14. The Sampling and Analysis Plan must include a schedule for sampling. Timing, duration, and frequency of monitoring must be based on the land use, complexity, hydrology, and size of the waterbody. Table 2 includes minimum monitoring frequency and parameter lists. Agricultural parameters that are less common may be monitored less frequently. Modifications to the receiving water quality monitoring parameters, frequency, and schedule may be submitted for Executive Officer consideration and approval. At a minimum, the Sampling and Analysis Plan schedule must consist of monthly monitoring of common agricultural parameters in major agricultural areas, including two major storm events during the wet season (October 1 – April 30).

15. Storm event monitoring must be conducted within 18 hours of storm events, preferably including the first flush run-off event that results in significant increase in stream flow. For purposes of this MRP, a storm event is defined as precipitation producing onsite runoff (surface water flow) capable of creating significant ponding, erosion or other water quality problem. A significant storm event will generally result in greater than 1-inch of rain within a 24-hour period.

16. Dischargers (individually or as part of a cooperative monitoring program) must perform receiving water quality monitoring per the Sampling and Analysis Plan and QAPP approved by the Executive Officer.

B. Surface Receiving Water Quality Reporting

<u>Surface Receiving Water Quality Data Submittal</u>

1. Dischargers (individually or as part of a cooperative monitoring program) must submit water quality monitoring data to the Central Coast Water Board electronically, in a format specified by the Executive Officer and compatible with SWAMP/CCAMP electronic submittal guidelines, each January 1, April 1, July 1, and October 1.

Surface Receiving Water Quality Monitoring Annual Report

2. **By July 1, 2017,** and every July 1 annually thereafter, Dischargers (individually or as part of a cooperative monitoring program) must submit an Annual Report, electronically, in a format specified by the Executive Officer including the following minimum elements:
    a. Signed Transmittal Letter;
    b. Title Page;
    c. Table of Contents;
    d. Executive Summary;
    e. Summary of Exceedance Reports submitted during the reporting period;
    f. Monitoring objectives and design;
    g. Monitoring site descriptions and rainfall records for the time period covered;
    h. Location of monitoring sites and map(s);
    i. Tabulated results of all analyses arranged in tabular form so that the required information is readily discernible;
    j. Summary of water quality data for any sites monitored as part of related monitoring programs, and used to evaluate receiving water as described in the Sampling and Analysis Plan.
    k. Discussion of data to clearly illustrate compliance with the Order and water quality standards;
    l. Discussion of short term patterns and long term trends in receiving water quality and beneficial use protection;
    m. Evaluation of pesticide and toxicity analyses results, and recommendation of candidate sites for Toxicity Identification Evaluations (TIEs);
    n. Identification of the location of any agricultural discharges observed discharging directly to surface receiving water;
    o. Laboratory data submitted electronically in a SWAMP/CCAMP comparable format;
    p. Sampling and analytical methods used;
    q. Copy of chain-of-custody forms;
    r. Field data sheets, signed laboratory reports, laboratory raw data;
    s. Associated laboratory and field quality control samples results;
    t. Summary of Quality Assurance Evaluation results;

u. Specify the method used to obtain flow at each monitoring site during each monitoring event;
v. Electronic or hard copies of photos obtained from all monitoring sites, clearly labeled with site ID and date;
w. Conclusions.

PART 2. GROUNDWATER MONITORING AND REPORTING REQUIREMENTS

Groundwater monitoring may be conducted through a cooperative monitoring and reporting program on behalf of growers, or Dischargers may choose to conduct groundwater monitoring and reporting individually. Qualifying cooperative groundwater monitoring and reporting programs must implement the groundwater monitoring and reporting requirements described in this Order, unless otherwise approved by the Executive Officer. An interested person may seek review by the Central Coast Water Board of the Executive Officer's approval or denial of a cooperative groundwater monitoring and reporting program.

Key monitoring and reporting requirements for groundwater are shown in Table 3.

A. Groundwater Monitoring

1. Dischargers must sample private domestic wells and the primary irrigation well on their farm/ranch to evaluate groundwater conditions in agricultural areas, identify areas at greatest risk for nitrogen loading and exceedance of drinking water standards, and identify priority areas for follow up actions.

2. Dischargers must sample at least one groundwater well for each farm/ranch on their operation, including groundwater wells that are located within the property boundary of the enrolled county assessor parcel numbers (APNs). For farms/ranches with multiple groundwater wells, Dischargers must sample all domestic wells and the primary irrigation well. For the purposes of this MRP, a "domestic well" is any well that is used or may be used for domestic use purposes, including any groundwater well that is connected to a residence, workshop, or place of business that may be used for human consumption, cooking, or sanitary purposes. Groundwater monitoring parameters must include well screen interval depths (if available), general chemical parameters, and general cations and anions listed in Table 3.

3. Dischargers must conduct two rounds of monitoring of required groundwater wells during calendar year 2017; one sample collected during spring (**March - June)** and one sample collected during fall **(September - December)**.

4. Groundwater samples must be collected by a qualified third party (e.g., consultant, technician, person conducting cooperative monitoring) using proper sampling methods, chain-of-custody, and quality assurance/quality

control protocols. Groundwater samples must be collected at or near the well head before the pressure tank and prior to any well head treatment. In cases where this is not possible, the water sample must be collected from a sampling point as close to the pressure tank as possible, or from a cold-water spigot located before any filters or water treatment systems.

5. Laboratory analyses for groundwater samples must be conducted by a State certified laboratory according to U.S. EPA approved methods; unless otherwise noted, all monitoring, sample preservation, and analyses must be performed in accordance with the latest edition of *Test Methods for Evaluating Solid Waste*, SW-846, United States Environmental Protection Agency, and analyzed as specified herein by the above analytical methods and reporting limits indicated. Certified laboratories can be found at the web link below: http://www.waterboards.ca.gov/centralcoast/water_issues/programs/ag_waivers/docs/resources4growers/2016_04_11_labs.pdf

6. If a discharger determines that water in any domestic well exceeds 10 mg/L of nitrate as N, the discharger or third party must provide notice to the Central Coast Water Board within 24 hours of learning of the exceedance. For domestic wells on a Discharger's farm/ranch that exceed 10 mg/L nitrate as N, the Discharger must provide written notification to the users within 10 days of learning of the exceedance and provide written confirmation of the notification to the Central Coast Water Board.

   The drinking water notification must include the statement that the water poses a human health risk due to elevated nitrate concentration, and include a warning against the use of the water for drinking or cooking. In addition, Dischargers must also provide prompt written notification to any new well users (e.g. tenants and employees with access to the affected well), whenever there is a change in occupancy.

   For all other domestic wells not on a Discharger's farm/ranch but that may be impacted by nitrate, the Central Coast Water Board will notify the users promptly.

   The drinking water notification and confirmation letters required by this Order are available to the public.

B. Groundwater Reporting

1. **Within 60 days of sample collection,** Dischargers must coordinate with the laboratory to submit the following groundwater monitoring results and information, electronically, using the Water Board's GeoTracker electronic deliverable format (EDF):
   a. GeoTracker Ranch Global Identification Number

b. Field point name (Well Name)
c. Field Point Class (Well Type)
d. Latitude
e. Longitude
f. Sample collection date
g. Analytical results
h. Well construction information (e.g., total depth, screened intervals, depth to water), as available

2. Dischargers must submit groundwater well information required in the electronic Notice of Intent (eNOI) for each farm/ranch and update the eNOI to reflect changes in the farm/ranch information within 30 days of the change. Groundwater well information reported on the eNOI includes, but is not limited to:

a. Number of groundwater wells present at each farm/ranch
b. Identification of any groundwater wells abandoned or destroyed (including method destroyed) in compliance with the Order
c. Use for fertigation or chemigation
d. Presence of back flow prevention devices
e. Number of groundwater wells used for agricultural purposes
f. Number of groundwater wells used for or may be used for domestic use purposes (domestic wells).

PART 3. GENERAL MONITORING AND REPORTING REQUIREMENTS

A. Submittal of Technical Reports

1. Dischargers must submit reports in a format specified by the Executive Officer. A transmittal letter must accompany each report, containing the following penalty of perjury statement signed by the Discharger or the Discharger's authorized agent:

   "In compliance with Water Code §13267, I certify under penalty of perjury that this document and all attachments were prepared by me, or under my direction or supervision following a system designed to assure that qualified personnel properly gather and evaluate the information submitted. To the best of my knowledge and belief, this document and all attachments are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment".

2. If the Discharger asserts that all or a portion of a report submitted pursuant to this Order is subject to an exemption from public disclosure (e.g. trade secrets or secret processes), the Discharger must provide an explanation of how those portions of the reports are exempt from public disclosure. The

Discharger must clearly indicate on the cover of the report (typically an electronic submittal) that the Discharger asserts that all or a portion of the report is exempt from public disclosure, submit a complete report with those portions that are asserted to be exempt in redacted form, submit separately (in a separate electronic file) unredacted pages (to be maintained separately by staff). The Central Coast Water Board staff will determine whether any such report or portion of a report qualifies for an exemption from public disclosure. If the Central Coast Water Board staff disagrees with the asserted exemption from public disclosure, the Central Coast Water Board staff will notify the Discharger prior to making such report or portions of such report available for public inspection.

B. Central Coast Water Board Authority

1. Monitoring reports are required pursuant to section 13267 of the California Water Code. Pursuant to section 13268 of the Water Code, a violation of a request made pursuant to section 13267 may subject you to civil liability of up to $1000 per day.

2. The Water Board needs the required information to determine compliance with Order No.R3-2017-0002. The evidence supporting these requirements is included in the findings of Order No.R3-2017-0002.

John M. Robertson
Executive Officer

March 8, 2017
Date

Table 1. Major Waterbodies in Agricultural Areas[1]

Hydrologic SubArea	Waterbody Name	Hydrologic SubArea	Waterbody Name
30510	Pajaro River	30920	Quail Creek
30510	Salsipuedes Creek	30920	Salinas Reclamation Canal
30510	Watsonville Slough	31022	Chorro Creek
30510	Watsonville Creek[2]	31023	Los Osos Creek
30510	Beach Road Ditch[2]	31023	Warden Creek
30530	Carnadero Creek	31024	San Luis Obispo Creek
30530	Furlong Creek[2]	31024	Prefumo Creek
30530	Llagas Creek	31031	Arroyo Grande Creek
30530	Miller’s Canal	31031	Los Berros Creek
30530	San Juan Creek	31210	Bradley Canyon Creek
30530	Tesquisquita Slough	31210	Bradley Channel
30600	Moro Cojo Slough	31210	Green Valley Creek
30910	Alisal Slough	31210	Main Street Canal
30910	Blanco Drain	31210	Orcutt Solomon Creek
30910	Old Salinas River	31210	Oso Flaco Creek
30910	Salinas River (below Gonzales Rd.)	31210	Little Oso Flaco Creek
30920	Salinas River (above Gonzales Rd. and below Nacimiento R.)	31210	Santa Maria River
30910	Santa Rita Creek[2]	31310	San Antonio Creek[2]
30910	Tembladero Slough	31410	Santa Ynez River
30920	Alisal Creek	31531	Bell Creek
30920	Chualar Creek	31531	Glenn Annie Creek
30920	Espinosa Slough	31531	Los Carneros Creek[2]
30920	Gabilan Creek	31534	Arroyo Paredon Creek
30920	Natividad Creek	31534	Franklin Creek

[1] At a minimum, monitoring sites must be included for these waterbodies in agricultural areas, unless otherwise approved by the Executive Officer. Monitoring sites may be proposed for addition or modification to better assess the impacts of waste discharges from irrigated lands to surface water. Dischargers choosing to comply with surface receiving water quality monitoring, individually (not part of a cooperative monitoring program) must only monitor sites for waterbodies receiving the discharge.

[2] These creeks are included because they are newly listed waterbodies on the 2010 303(d) list of Impaired Waters that are associated with areas of agricultural discharge.

Table 2. Surface Receiving Water Quality Monitoring Parameters

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Photo Monitoring		
Upstream and downstream photographs at monitoring location		With every monitoring event
WATER COLUMN SAMPLING		
Physical Parameters and General Chemistry		
Flow (field measure) (CFS) following SWAMP field SOP[9]	.25	Monthly, including 2 stormwater events
pH (field measure)	0.1	”
Electrical Conductivity (field measure) (μS/cm)	2.5	”
Dissolved Oxygen (field measure) (mg/L)	0.1	”
Temperature (field measure) (°C)	0.1	”
Turbidity (NTU)	0.5	”
Total Dissolved Solids (mg/L)	10	”
Total Suspended Solids (mg/L)	0.5	”
Nutrients		
Total Nitrogen (mg/L)	0.5	Monthly, including 2 stormwater events
Nitrate + Nitrite (as N) (mg/L)	0.1	”
Total Ammonia (mg/L)	0.1	”
Unionized Ammonia (calculated value, mg/L))		”
Total Phosphorus (as P) (mg/L)	0.02	
Soluble Orthophosphate (mg/L)	0.01	”
Water column chlorophyll a (μg/L)	1.0	“
Algae cover, Floating Mats, % coverage	-	“
Algae cover, Attached, % coverage	-	“
Water Column Toxicity Test		
Algae - *Selenastrum capricornutum (*96-hour chronic; Method1003.0 in EPA/821/R-02/013)	-	4 times each year, twice in dry season, twice in wet season
Water Flea – *Ceriodaphnia dubia* (7-day chronic; Method 1002.0 in EPA/821/R-02/013)	-	”
Midge - *Chironomus spp.* (96-hour acute; Alternate test species in EPA 821-R-02-012)	-	“

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Toxicity Identification Evaluation (TIE)	-	As directed by Executive Officer
Pesticides[2] /Herbicides (µg/L)		
Organophosphate Pesticides		
Azinphos-methyl	0.02	2 times in both 2017 and 2018, once in dry season and once in wet season of each year, concurrent with water toxicity monitoring
Chlorpyrifos	0.005	”
Diazinon	0.005	”
Dichlorvos	0.01	”
Dimethoate	0.01	”
Dimeton-s	0.005	”
Disulfoton (Disyton)	0.005	”
Malathion	0.005	”
Methamidophos	0.02	”
Methidathion	0.02	“
Parathion-methyl	0.02	“
Phorate	0.01	“
Phosmet	0.02	“
Neonicotinoids		
Thiamethoxam	.002	“
Imidacloprid	.002	“
Thiacloprid	.002	“
Dinotefuran	.006	“
Acetamiprid	.01	“
Clothianidin	.02	“
Herbicides		
Atrazine	0.05	“
Cyanazine	0.20	“
Diuron	0.05	“
Glyphosate	2.0	“
Linuron	0.1	“
Paraquat	0.20	“
Simazine	0.05	“
Trifluralin	0.05	“
Metals (µg/L)		
Arsenic (total) [5,7]	0.3	2 times in both 2017 and 2018, once in dry season and once in wet season of each year, concurrent with water toxicity monitoring
Boron (total) [6,7]	10	“
Cadmium (total & dissolved) [4.5,7]	0.01	“

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Copper (total and dissolved) [4,7]	0.01	“
Lead (total and dissolved) [4,7]	0.01	“
Nickel (total and dissolved) [4,7]	0.02	“
Molybdenum (total) [7]	1	“
Selenium (total)[7]	0.30	“
Zinc (total and dissolved) [4.5,7]	0.10	“
Other (µg/L)		
Total Phenolic Compounds[8]	5	2 times in 2017, once in spring (April-May) and once in fall (August-September)
Hardness (mg/L as CaCO3)	1	“
Total Organic Carbon (ug/L)	0.6	“
SEDIMENT SAMPLING		
Sediment Toxicity - *Hyalella azteca* 10-day static renewal (EPA, 2000)		2 times each year, once in spring (April-May) and once in fall (August-September)
Pyrethroid Pesticides in Sediment (µg/kg)		
Gamma-cyhalothrin	2	2 times in both 2017 and 2018, once in spring (April-May) and once in fall (August-September) of each year, concurrent with sediment toxicity sampling
Lambda-cyhalothrin	2	“
Bifenthrin	2	“
Beta-cyfluthrin	2	“
Cyfluthrin	2	“
Esfenvalerate	2	“
Permethrin	2	“
Cypermethrin	2	“
Danitol	2	“
Fenvalerate	2	“
Fluvalinate	2	“
Other Monitoring in Sediment		
Chlorpyrifos (µg/kg)	2	“
Total Organic Carbon	0.01%	“
		“
Sediment Grain Size Analysis	1%	“

[1]Monitoring frequency may be used as a guide for developing alternative Sampling and Analysis Plans implemented by individual growers.
[2]Pesticide list may be modified based on specific pesticide use in Central Coast Region. Analytes on this list must be reported, at a minimum.
[3] Reporting Limit, taken from SWAMP where applicable.
[4] Holmgren, Meyer, Cheney and Daniels. 1993. Cadmium, Lead, Zinc, Copper and Nickel in Agricultural Soils of the United States. J. of Environ. Quality 22:335-348.

[5]Sax and Lewis, ed. 1987. Hawley's Condensed Chemical Dictionary. 11th ed. New York: Van Nostrand Reinhold Co., 1987. Zinc arsenate is an insecticide.
[6]Http://www.coastalagro.com/products/labels/9%25BORON.pdf; Boron is applied directly or as a component of fertilizers as a plant nutrient.
[7]Madramootoo, Johnston, Willardson, eds. 1997. Management of Agricultural Drainage Water Quality. International Commission on Irrigation and Drainage. U.N. FAO. SBN 92-6-104058.3.
[8]http://cat.inist.fr/?aModele=afficheN&cpsidt=14074525; Phenols are breakdown products of herbicides and pesticides. Phenols can be directly toxic and cause endocrine disruption.
[9]See SWAMP field measures SOP, p. 17
mg/L – milligrams per liter; ug/L – micrograms per liter; ug/kg – micrograms per kilogram;
NTU – Nephelometric Turbidity Units; CFS – cubic feet per second.

Table 3. Groundwater Sampling Parameters

Parameter	RL	Analytical Method[3]	Units
pH	0.1	Field or Laboratory Measurement EPA General Methods	pH Units
Specific Conductance	2.5		µS/cm
Total Dissolved Solids	10		mg/L
Total Alkalinity as $CaCO_3$		EPA Method 310.1 or 310.2	
Calcium	0.05	General Cations[1] EPA 200.7, 200.8, 200.9	
Magnesium	0.02		
Sodium	0.1		
Potassium	0.1		
Sulfate (SO4)	1.0	General Anions EPA Method 300 or EPA Method 353.2	
Chloride	0.1		
Nitrate + Nitrite (as N)[2] or Nitrate as N	0.1		

[1]General chemistry parameters (major cations and anions) represent geochemistry of water bearing zone and assist in evaluating quality assurance/quality control of groundwater monitoring and laboratory analysis.
[2]The MRP allows analysis of "nitrate plus nitrite" to represent nitrate concentrations (as N). The "nitrate plus nitrite" analysis allows for extended laboratory holding times and relieves the Discharger of meeting the short holding time required for nitrate.
[3]Dischargers may use alternative analytical methods approved by EPA.
RL – Reporting Limit; µS/cm – micro siemens per centimeter

Table 4. Tier 1 - Time Schedule for Key Monitoring and Reporting Requirements (MRPs)

REQUIREMENT	TIME SCHEDULE[1]
Submit Sampling And Analysis Plan and Quality Assurance Project Plan (SAAP/QAPP) for Surface Receiving Water Quality Monitoring *(individually or through cooperative monitoring program)*	By March 1, 2018, or as directed by the Executive Officer; satisfied if an approved SAAP/QAPP has been submitted pursuant to Order No. R3-2012-0011 and associated MRPs
Initiate surface receiving water quality monitoring *(individually or through cooperative monitoring program)*	Per an approved SAAP and QAPP
Submit surface receiving water quality monitoring data *(individually or through cooperative monitoring program)*	Each January 1, April 1, July 1, and October 1

Submit surface receiving water quality Annual Monitoring Report *(individually or through cooperative monitoring program)*	By July 1 2017; annually thereafter by July 1
Initiate monitoring of groundwater wells	First sample from March-June 2017, second sample from September-December 2017
Submit groundwater monitoring results	Within 60 days of the sample collection

[1] Dates are relative to adoption of this Order, unless otherwise specified.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

MONITORING AND REPORTING PROGRAM
ORDER NO. R3-2017-0002-02

TIER 2

DISCHARGERS ENROLLED UNDER THE CONDITIONAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES FROM IRRIGATED LANDS

This Monitoring and Reporting Program Order No. R3-2017-0002-02 (MRP) is issued pursuant to California Water Code (Water Code) sections 13267 and 13269, which authorize the California Regional Water Quality Control Board, Central Coast Region (hereafter Central Coast Water Board) to require preparation and submittal of technical and monitoring reports. Water Code section 13269 requires a waiver of waste discharge requirements to include as a condition the performance of monitoring and the public availability of monitoring results. *Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands*, Order No. R3-2017-0002 (Order) includes criteria and requirements for three tiers. This MRP sets forth monitoring and reporting requirements for **Tier 2 Dischargers** enrolled under the Order. A summary of the requirements is shown below.

SUMMARY OF MONITORING AND REPORTING REQUIREMENTS FOR TIER 2:

Part 1: Surface Receiving Water Monitoring and Reporting *(cooperative or individual)*
Part 2: Groundwater Monitoring and Reporting *(cooperative or individual)*
Total Nitrogen Applied Reporting *(required for subset of Tier 2 Dischargers if farm/ranch growing any crop with high nitrate loading risk to groundwater);*
Part 3: Annual Compliance Form

Pursuant to Water Code section 13269(a)(2), monitoring requirements must be designed to support the development and implementation of the waiver program, including, but not limited to, verifying the adequacy and effectiveness of the waiver's conditions. The monitoring and reports required by this MRP are to evaluate effects of discharges of waste from irrigated agricultural operations and individual farms/ranches on waters of the state and to determine compliance with the Order.

MONITORING AND REPORTING BASED ON TIERS

The Order and MRP include criteria and requirements for three tiers, based upon those characteristics of the individual farms/ranches at the operation that present the highest level of waste discharge or greatest risk to water quality. Dischargers must meet conditions of the Order and MRP for the appropriate tier that applies to their land and/or the individual farm/ranch. Within a tier, Dischargers comply with requirements based on the specific level of discharge and threat to water quality from individual farms/ranches. The lowest tier, Tier 1, applies to dischargers who discharge the lowest level of waste (amount or concentration) or pose the lowest potential to cause or contribute to an exceedance of water quality standards in waters of the State or of the United States. The highest tier, Tier 3, applies to dischargers who discharge the highest level of waste or pose the greatest potential to cause or contribute to an exceedance of water quality standards in waters of the State or of the United States. Tier 2 applies to dischargers whose discharge has a moderate threat to water quality. Water quality is defined in terms of regional, state, or federal numeric or narrative water quality standards. Per the Order, Dischargers may submit a request to the Executive Officer to approve transfer to a lower tier. If the Executive Officer approves a transfer to a lower tier, any interested person may request that the Central Coast Water Board conduct a review of the Executive Officer's determination.

PART 1. SURFACE RECEIVING WATER MONITORING AND REPORTING REQUIREMENTS

The surface receiving water monitoring and reporting requirements described herein are generally a continuation of the surface receiving water monitoring and reporting requirements of Monitoring and Reporting Program Order No. 2012-0011-02, as revised August 22, 2016, with the intent of uninterrupted regular monitoring and reporting during the transition from Order No. R3-2012-0011-02 to Order No. R3-2017-0002-02.

Monitoring and reporting requirements for surface receiving water identified in Part 1.A. and Part 1.B. apply to Tier 2 Dischargers. Surface receiving water refers to water flowing in creeks and other surface waters of the State. Surface receiving water monitoring may be conducted through a cooperative monitoring program on behalf of Dischargers, or Dischargers may choose to conduct surface receiving water monitoring and reporting individually. Key monitoring and reporting requirements for surface receiving water are shown in Tables 1 and 2. Time schedules are shown in Table4.

A. Surface Receiving Water Quality Monitoring

1. Dischargers must elect a surface receiving water monitoring option (cooperative monitoring program or individual receiving water monitoring) to comply with surface receiving water quality monitoring requirements, and identify the option selected on the Notice of Intent (NOI).

2. Dischargers are encouraged to choose participation in a cooperative monitoring program (e.g., the existing Cooperative Monitoring Program or a similar program) to comply with receiving water quality monitoring requirements. Dischargers not participating in a cooperative monitoring program must conduct surface receiving water quality monitoring individually that achieves the same purpose.

3. Dischargers (individually or as part of a cooperative monitoring program) must conduct surface receiving water quality monitoring to a) assess the impacts of their waste discharges from irrigated lands to receiving water, b) assess the status of receiving water quality and beneficial use protection in impaired waterbodies dominated by irrigated agricultural activity, c) evaluate status, short term patterns and long term trends (five to ten years or more) in receiving water quality, d) evaluate water quality impacts resulting from agricultural discharges (including but not limited to tile drain discharges), e) evaluate stormwater quality, f) evaluate condition of existing perennial, intermittent, or ephemeral streams or riparian or wetland area habitat, including degradation resulting from erosion or agricultural discharges of waste, and g) assist in the identification of specific sources of water quality problems.

<u>Surface Receiving Water Quality Sampling and Analysis Plan</u>

4. **By March 1, 2018, or as directed by the Executive Officer**, Dischargers (individually or as part of a cooperative monitoring program) must submit a surface receiving water quality Sampling and Analysis Plan (SAAP) and Quality Assurance Project Plan (QAPP); this requirement is satisfied if an approved SAAP and QAPP addressing all surface receiving water quality monitoring requirements described in this Order has been submitted pursuant to Order No.R3-2012-0011 and associated Monitoring and Reporting Programs. Dischargers (or a third party cooperative monitoring program) must develop the Sampling and Analysis Plan to describe how the proposed monitoring will achieve the objectives of the MRP and evaluate compliance with the Order. The Sampling and Analysis Plan may propose alternative monitoring site locations, adjusted monitoring parameters, and other changes as necessary to assess the impacts of waste discharges from irrigated lands to receiving water. The Executive Officer must approve the Sampling and Analysis Plan and QAPP.

5. The Sampling and Analysis Plan must include the following minimum required components:
    a. Monitoring strategy to achieve objectives of the Order and MRP;
    b. Map of monitoring sites with GIS coordinates;

c. Identification of known water quality impairments and impaired waterbodies per the 2010 Clean Water Act 303(d) List of Impaired Waterbodies (List of Impaired Waterbodies);
d. Identification of beneficial uses and applicable water quality standards;
e. Identification of applicable Total Maximum Daily Loads;
f. Monitoring parameters;
g. Monitoring schedule, including description and frequencies of monitoring events;
h. Description of data analysis methods;

6. The QAPP must include receiving water and site-specific information, project organization and responsibilities, and quality assurance components of the MRP. The QAPP must also include the laboratory and field requirements to be used for analyses and data evaluation. The QAPP must contain adequate detail for project and Water Board staff to identify and assess the technical and quality objectives, measurement and data acquisition methods, and limitations of the data generated under the surface receiving water quality monitoring. All sampling and laboratory methodologies and QAPP content must be consistent with U.S. EPA methods, State Water Board's Surface Water Ambient Monitoring Program (SWAMP) protocols and the Central Coast Water Board's Central Coast Ambient Monitoring Program (CCAMP). Following U.S. EPA guidelines[1] and SWAMP templates[2], the receiving water quality monitoring QAPP must include the following minimum required components:
   a. Project Management. This component addresses basic project management, including the project history and objectives, roles and responsibilities of the participants, and other aspects.
   b. Data Generation and Acquisition. This component addresses all aspects of project design and implementation. Implementation of these elements ensures that appropriate methods for sampling, measurement and analysis, data collection or generation, data handling, and quality control activities are employed and are properly documented. Quality control requirements are applicable to all the constituents sampled as part of the MRP, as described in the appropriate method.
   c. Assessment and Oversight. This component addresses the activities for assessing the effectiveness of the implementation of the project and associated QA and QC activities. The purpose of the assessment is to provide project oversight that

[1] USEPA 2001 (2006) USEPA requirements for Quality Assurance Project Plans (QA/R-5) Office of Environmental Information, Washington, D.C. USEPA QA/R-5
[2] http://waterboards.ca.gov/water_issues/programs/swamp/tools.shtml#qa

will ensure that the QA Project Plan is implemented as prescribed.

d. Data Validation and Usability. This component addresses the quality assurance activities that occur after the data collection, laboratory analysis and data generation phase of the project is completed. Implementation of these elements ensures that the data conform to the specified criteria, thus achieving the MRP objectives.

7. The Central Coast Water Board may conduct an audit of contracted laboratories at any time in order to evaluate compliance with the QAPP.

8. The Sampling and Analysis Plan and QAPP, and any proposed revisions are subject to approval by the Executive Officer. The Executive Officer may also revise the Sampling and Analysis Plan, including adding, removing, or changing monitoring site locations, changing monitoring parameters, and other changes as necessary to assess the impacts of waste discharges from irrigated lands to receiving water.

<u>Surface Receiving Water Quality Monitoring Sites</u>

9. The Sampling and Analysis Plan must, at a minimum, include monitoring sites to evaluate waterbodies identified in Table 1, unless otherwise approved by the Executive Officer. The Sampling and Analysis Plan must include sites to evaluate receiving water quality impacts most directly resulting from areas of agricultural discharge (including areas receiving tile drain discharges). Site selection must take into consideration the existence of any long term monitoring sites included in related monitoring programs (e.g. CCAMP and the existing CMP). Sites may be added or modified, subject to prior approval by the Executive Officer, to better assess the pollutant loading from individual sources or the impacts to receiving waters caused by individual discharges. Any modifications must consider sampling consistency for purposes of trend evaluation.

<u>Surface Receiving Water Quality Monitoring Parameters</u>

10. The Sampling and Analysis Plan must, at a minimum, include the following types of monitoring and evaluation parameters listed below and identified in Table 2:

    a. Flow Monitoring;
    b. Water Quality (physical parameters, metals, nutrients, pesticides);
    c. Toxicity (water and sediment);
    d. Assessment of Benthic Invertebrates.

11. All analyses must be conducted at a laboratory certified for such analyses by the State Department of Public Health (CDPH) or at laboratories approved by the Executive Officer. Unless otherwise noted, all sampling, sample preservation, and analyses must be performed in accordance with the latest edition of *Test Methods for Evaluating Solid Waste*, SW-846, U.S. EPA, and analyzed as specified herein by the above analytical methods and reporting limits indicated. Certified laboratories can be found at the web link: http://www.cdph.ca.gov/certlic/labs/Documents/ELAPLablist.xls

12. Water quality and flow monitoring is used to assess the sources, concentrations, and loads of waste discharges from individual farms/ranches and groups of Dischargers to surface waters, to evaluate impacts to water quality and beneficial uses, and to evaluate the short term patterns and long term trends in receiving water quality. Monitoring data must be compared to existing numeric and narrative water quality objectives.

13. Toxicity testing is to evaluate water quality relative to the narrative toxicity objective. Water column toxicity analyses must be conducted on 100% (undiluted) sample. At sites where persistent unresolved toxicity is found, the Executive Officer may require concurrent toxicity and chemical analyses and a Toxicity Identification Evaluation (TIE) to identify the individual discharges causing the toxicity.

Surface Receiving Water Quality Monitoring Frequency and Schedule

14. The Sampling and Analysis Plan must include a schedule for sampling. Timing, duration, and frequency of monitoring must be based on the land use, complexity, hydrology, and size of the waterbody. Table 2 includes minimum monitoring frequency and parameter lists. Agricultural parameters that are less common may be monitored less frequently. Modifications to the receiving water quality monitoring parameters, frequency, and schedule may be submitted for Executive Officer consideration and approval. At a minimum, the Sampling and Analysis Plan schedule must consist of monthly monitoring of common agricultural parameters in major agricultural areas, including two major storm events during the wet season (October 1 – April 30).

15. Storm event monitoring must be conducted within 18 hours of storm events, preferably including the first flush run-off event that results in significant increase in stream flow. For purposes of this MRP, a storm event is defined as precipitation producing onsite runoff (surface water flow) capable of creating significant ponding, erosion or other water quality problem. A

significant storm event will generally result in greater than 1-inch of rain within a 24-hour period.

16. Dischargers (individually or as part of a cooperative monitoring program) must perform receiving water quality monitoring per the Sampling and Analysis Plan and QAPP approved by the Executive Officer.

B. Surface Receiving Water Quality Reporting

Surface Receiving Water Quality Data Submittal

1. Dischargers (individually or as part of a cooperative monitoring program) must submit water quality monitoring data to the Central Coast Water Board electronically, in a format specified by the Executive Officer and compatible with SWAMP/CCAMP electronic submittal guidelines, each January 1, April 1, July 1, and October 1.

Surface Receiving Water Quality Monitoring Annual Report

2. **By July 1, 2017,** and every July 1 annually thereafter, Dischargers (individually or as part of a cooperative monitoring program) must submit an Annual Report, electronically, in a format specified by the Executive Officer including the following minimum elements:
   a. Signed Transmittal Letter;
   b. Title Page;
   c. Table of Contents;
   d. Executive Summary;
   e. Summary of Exceedance Reports submitted during the reporting period;
   f. Monitoring objectives and design;
   g. Monitoring site descriptions and rainfall records for the time period covered;
   h. Location of monitoring sites and map(s);
   i. Tabulated results of all analyses arranged in tabular form so that the required information is readily discernible;
   j. Summary of water quality data for any sites monitored as part of related monitoring programs, and used to evaluate receiving water as described in the Sampling and Analysis Plan.
   k. Discussion of data to clearly illustrate compliance with the Order and water quality standards;
   l. Discussion of short term patterns and long term trends in receiving water quality and beneficial use protection;
   m. Evaluation of pesticide and toxicity analyses results, and recommendation of candidate sites for Toxicity Identification Evaluations (TIEs);

n. Identification of the location of any agricultural discharges observed discharging directly to surface receiving water;
o. Laboratory data submitted electronically in a SWAMP/CCAMP comparable format;
p. Sampling and analytical methods used;
q. Copy of chain-of-custody forms;
r. Field data sheets, signed laboratory reports, laboratory raw data;
s. Associated laboratory and field quality control samples results;
t. Summary of Quality Assurance Evaluation results;
u. Specify the method used to obtain flow at each monitoring site during each monitoring event;
v. Electronic or hard copies of photos obtained from all monitoring sites, clearly labeled with site ID and date;
w. Conclusions.

PART 2. GROUNDWATER MONITORING AND REPORTING REQUIREMENTS

Groundwater monitoring may be conducted through a cooperative monitoring and reporting program on behalf of growers, or Dischargers may choose to conduct groundwater monitoring and reporting individually. Qualifying cooperative groundwater monitoring and reporting programs must implement the groundwater monitoring and reporting requirements described in this Order, unless otherwise approved by the Executive Officer. An interested person may seek review by the Central Coast Water Board of the Executive Officer's approval or denial of a cooperative groundwater monitoring and reporting program.

Key monitoring and reporting requirements for groundwater are shown in Table 3.

A. Groundwater Monitoring

1. Dischargers must sample private domestic wells and the primary irrigation well on their farm/ranch to evaluate groundwater conditions in agricultural areas, identify areas at greatest risk for nitrogen loading and exceedance of drinking water standards, and identify priority areas for follow up actions.

2. Dischargers must sample at least one groundwater well for each farm/ranch on their operation, including groundwater wells that are located within the property boundary of the enrolled county assessor parcel numbers (APNs). For farms/ranches with multiple groundwater wells, Dischargers must sample all domestic wells and the primary irrigation well. For the purposes of this MRP, a "domestic well" is any well that is used or may be used for domestic use purposes, including any groundwater well that is connected to a residence, workshop, or place of business that may be used for human consumption, cooking, or sanitary purposes. Groundwater monitoring

parameters must include well screen interval depths (if available), general chemical parameters, and general cations and anions listed in Table 3.

3. Dischargers must conduct two rounds of monitoring of required groundwater wells during calendar year 2017; one sample collected during spring (**March - June)** and one sample collected during fall **(September - December)**.

4. Groundwater samples must be collected by a qualified third party (e.g., consultant, technician, person conducting cooperative monitoring) using proper sampling methods, chain-of-custody, and quality assurance/quality control protocols. Groundwater samples must be collected at or near the well head before the pressure tank and prior to any well head treatment. In cases where this is not possible, the water sample must be collected from a sampling point as close to the pressure tank as possible, or from a cold-water spigot located before any filters or water treatment systems.

5. Laboratory analyses for groundwater samples must be conducted by a State certified laboratory according to U.S. EPA approved methods; unless otherwise noted, all monitoring, sample preservation, and analyses must be performed in accordance with the latest edition of *Test Methods for Evaluating Solid Waste*, SW-846, United States Environmental Protection Agency, and analyzed as specified herein by the above analytical methods and reporting limits indicated. Certified laboratories can be found at the web link below: http://www.waterboards.ca.gov/centralcoast/water_issues/programs/ag_waivers/docs/resources4growers/2016_04_11_labs.pdf

6. If a discharger determines that water in any domestic well exceeds 10 mg/L of nitrate as N, the discharger or third party must provide notice to the Central Coast Water Board within 24 hours of learning of the exceedance. For domestic wells on a Discharger's farm/ranch, that exceed 10 mg/L of nitrate as N, the Discharger must provide written notification to the users within 10 days of learning of the exceedance and provide written confirmation of the notification to the Central Coast Water Board.

   The drinking water notification must include the statement that the water poses a human health risk due to elevated nitrate concentration, and include a warning against the use of the water for drinking or cooking. In addition, Dischargers must also provide prompt written notification to any new well users (e.g. tenants and employees with access to the affected well), whenever there is a change in occupancy.

   For all other domestic wells not on a Discharger's farm/ranch but that may be impacted by nitrate, the Central Coast Water Board will notify the users promptly.

The drinking water notification and confirmation letters required by this Order are available to the public.

B. Groundwater Reporting

1. **Within 60 days of sample collection,** Dischargers must coordinate with the laboratory to submit the following groundwater monitoring results and information, electronically, using the Water Board's GeoTracker electronic deliverable format (EDF):
   a. GeoTracker Ranch Global Identification Number
   b. Field point name (Well Name)
   c. Field Point Class (Well Type)
   d. Latitude
   e. Longitude
   f. Sample collection date
   g. Analytical results
   h. Well construction information (e.g., total depth, screened intervals, depth to water), as available

2. Dischargers must submit groundwater well information required in the electronic Notice of Intent (eNOI) for each farm/ranch and update the eNOI to reflect changes in the farm/ranch information within 30 days of the change. Groundwater well information reported on the eNOI includes, but is not limited to:
   a. Number of groundwater wells present at each farm/ranch
   b. Identification of any groundwater wells abandoned or destroyed (including method destroyed) in compliance with the Order
   c. Use for fertigation or chemigation
   d. Presence of back flow prevention devices
   e. Number of groundwater wells used for agricultural purposes
   f. Number of groundwater wells used for or may be used for domestic use purposes (domestic wells).

C. Total Nitrogen Applied Reporting

1. By March 1, 2018, and by March 1 annually thereafter, Tier 2 Dischargers growing any crop with a high potential to discharge nitrogen to groundwater must record and report total nitrogen applied for each specific crop that was irrigated and grown for commercial purposes on that farm/ranch during the preceding calendar year (January through December).

   Crops with a high potential to discharge nitrogen to groundwater are: beet, broccoli, cabbage, cauliflower, celery, Chinese cabbage (napa), collard, endive, kale, leek, lettuce (leaf and head), mustard, onion (dry and green), spinach, strawberry, pepper (fruiting), and parsley.

Total nitrogen applied must be reported on the Total Nitrogen Applied Report form as described in the Total Nitrogen Applied Report form instructions.

Total nitrogen applied includes any product containing any form or concentration of nitrogen including, but not limited to, organic and inorganic fertilizers, slow release products, compost, compost teas, manure, and extracts.

2. The Total Nitrogen Applied Report form includes the following information:
    a. General ranch information such as GeoTracker file numbers, name, location, acres.
    b. Nitrogen concentration of irrigation water
    c. Nitrogen applied in pounds per acre with irrigation water
    d. Nitrogen present in the soil
    e. Nitrogen applied with compost and amendments
    f. Specific crops grown
    g. Nitrogen applied in pounds per acre with fertilizers and other materials to each specific crop grown
    h. Crop acres of each specific crop grown
    i. Whether each specific crop was grown organically or conventionally
    j. Basis for the nitrogen applied
    k. Explanation and comments section
    l. Certification statement with penalty of perjury declaration
    m. Additional information regarding whether each specific crop was grown in a nursery, greenhouse, hydroponically, in containers, and similar variables.

PART 3. ANNUAL COMPLIANCE FORM

Tier 2 Dischargers must submit annual compliance information, electronically, on the Annual Compliance Form. The purpose of the electronic Annual Compliance Form is to provide information to the Central Coast Water Board to assist in the evaluation of threat to water quality from individual agricultural discharges of waste and measure progress towards water quality improvement and verify compliance with the Order and MRP. Time schedules are shown in Table 4.

A. Annual Compliance Form

1. **By March 1, 2018, and updated annually thereafter by March 1**, Tier 2 Dischargers must submit an Annual Compliance Form electronically, in a

format specified by the Executive Officer. The electronic Annual Compliance Form includes, but is not limited to the following minimum requirements[1]:

a. Question regarding consistency between the Annual Compliance Form and the electronic Notice of Intent (eNOI);
b. Information regarding type and characteristics of discharge (e.g., number of discharge points, estimated flow/volume, number of tailwater days);
c. Identification of any direct agricultural discharges to a stream, lake, estuary, bay, or ocean;
d. Identification of specific farm water quality management practices completed, in progress, and planned to address water quality impacts caused by discharges of waste including irrigation management, pesticide management, nutrient management, salinity management, stormwater management, and sediment and erosion control to achieve compliance with this Order; and identification of specific methods used, and described in the Farm Plan consistent with Order Provision 44.g., for the purposes of assessing the effectiveness of management practices implemented and the outcomes of such assessments;
e. Proprietary information question and justification;
f. Authorization and certification statement and declaration of penalty of perjury.

PART 5. GENERAL MONITORING AND REPORTING REQUIREMENTS

A. Submittal of Technical Reports

1. Dischargers must submit reports in a format specified by the Executive Officer. A transmittal letter must accompany each report, containing the following penalty of perjury statement signed by the Discharger or the Discharger's authorized agent:

   "In compliance with Water Code §13267, I certify under penalty of perjury that this document and all attachments were prepared by me, or under my direction or supervision following a system designed to assure that qualified personnel properly gather and evaluate the information submitted. To the best of my knowledge and belief, this document and all attachments are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment".

[1] Items reported in the Annual Compliance Form are due by March 1, 2018, and annually thereafter, unless otherwise specified.

2. If the Discharger asserts that all or a portion of a report submitted pursuant to this Order is subject to an exemption from public disclosure (e.g. trade secrets or secret processes), the Discharger must provide an explanation of how those portions of the reports are exempt from public disclosure. The Discharger must clearly indicate on the cover of the report (typically an electronic submittal) that the Discharger asserts that all or a portion of the report is exempt from public disclosure, submit a complete report with those portions that are asserted to be exempt in redacted form, submit separately (in a separate electronic file) unredacted pages (to be maintained separately by staff). The Central Coast Water Board staff will determine whether any such report or portion of a report qualifies for an exemption from public disclosure. If the Central Coast Water Board staff disagrees with the asserted exemption from public disclosure, the Central Coast Water Board staff will notify the Discharger prior to making such report or portions of such report available for public inspection.

B. Central Coast Water Board Authority

1. Monitoring reports are required pursuant to section 13267 of the California Water Code. Pursuant to section 13268 of the Water Code, a violation of a request made pursuant to section 13267 may subject you to civil liability of up to $1000 per day.

2. The Water Board needs the required information to determine compliance with Order No. R3-2017-0002. The evidence supporting these requirements is included in the findings of Order No. R3-2017-0002.

John M. Robertson
Executive Officer

March 8, 2017
Date

Table 1. Major Waterbodies in Agricultural Areas[1]

Hydrologic SubArea	Waterbody Name	Hydrologic SubArea	Waterbody Name
30510	Pajaro River	30920	Quail Creek
30510	Salsipuedes Creek	30920	Salinas Reclamation Canal
30510	Watsonville Slough	31022	Chorro Creek
30510	Watsonville Creek[2]	31023	Los Osos Creek
30510	Beach Road Ditch[2]	31023	Warden Creek
30530	Carnadero Creek	31024	San Luis Obispo Creek
30530	Furlong Creek[2]	31024	Prefumo Creek
30530	Llagas Creek	31031	Arroyo Grande Creek
30530	Miller's Canal	31031	Los Berros Creek
30530	San Juan Creek	31210	Bradley Canyon Creek
30530	Tesquisquita Slough	31210	Bradley Channel
30600	Moro Cojo Slough	31210	Green Valley Creek
30910	Alisal Slough	31210	Main Street Canal
30910	Blanco Drain	31210	Orcutt Solomon Creek
30910	Old Salinas River	31210	Oso Flaco Creek
30910	Salinas River (below Gonzales Rd.)	31210	Little Oso Flaco Creek
30920	Salinas River above Gonzales Rd. and below Nacimiento R.)	31210	Santa Maria River
30910	Santa Rita Creek[2]	31310	San Antonio Creek[2]
30910	Tembladero Slough	31410	Santa Ynez River
30920	Alisal Creek	31531	Bell Creek
30920	Chualar Creek	31531	Glenn Annie Creek
30920	Espinosa Slough	31531	Los Carneros Creek[2]
30920	Gabilan Creek	31534	Arroyo Paredon Creek
30920	Natividad Creek	31534	Franklin Creek

[1] At a minimum, monitoring sites must be included for these waterbodies in agricultural areas, unless otherwise approved by the Executive Officer. Monitoring sites may be proposed for addition or modification to better assess the impacts of waste discharges from irrigated lands to surface water. Dischargers choosing to comply with surface receiving water quality monitoring, individually (not part of a cooperative monitoring program) must only monitor sites for waterbodies receiving the discharge.

[2] These creeks are included because they are newly listed waterbodies on the 2010 303(d) list of Impaired Waters that are associated with areas of agricultural discharge.

Table 2. Surface Receiving Water Quality Monitoring Parameters

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Photo Monitoring		
Upstream and downstream photographs at monitoring location		With every monitoring event
WATER COLUMN SAMPLING		
Physical Parameters and General Chemistry		
Flow (field measure) (CFS) following SWAMP field SOP[9]	.25	Monthly, including 2 stormwater events
pH (field measure)	0.1	”
Electrical Conductivity (field measure) (µS/cm)	2.5	”
Dissolved Oxygen (field measure) (mg/L)	0.1	”
Temperature (field measure) (^{o}C)	0.1	”
Turbidity (NTU)	0.5	”
Total Dissolved Solids (mg/L)	10	”
Total Suspended Solids (mg/L)	0.5	”
Nutrients		
Total Nitrogen (mg/L)	0.5	Monthly, including 2 stormwater events
Nitrate + Nitrite (as N) (mg/L)	0.1	”
Total Ammonia (mg/L)	0.1	”
Unionized Ammonia (calculated value, mg/L))		”
Total Phosphorus (as P) (mg/L)	0.02	
Soluble Orthophosphate (mg/L)	0.01	”
Water column chlorophyll a (µg/L)	1.0	“
Algae cover, Floating Mats, % coverage	-	“
Algae cover, Attached, % coverage	-	“
Water Column Toxicity Test		
Algae - *Selenastrum capricornutum (*96-hour chronic; Method1003.0 in EPA/821/R-02/013)	-	4 times each year, twice in dry season, twice in wet season
Water Flea – *Ceriodaphnia dubia* (7-day chronic; Method 1002.0 in EPA/821/R-02/013)	-	”
Midge - *Chironomus spp.* (96-hour acute; Alternate test species in EPA 821-R-02-012)	-	“

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Toxicity Identification Evaluation (TIE)	-	As directed by Executive Officer
Pesticides[2] /Herbicides (µg/L)		
Organophosphate Pesticides		
Azinphos-methyl	0.02	2 times in both 2017 and 2018, once in dry season and once in wet season of each year, concurrent with water toxicity monitoring
Chlorpyrifos	0.005	”
Diazinon	0.005	”
Dichlorvos	0.01	”
Dimethoate	0.01	”
Dimeton-s	0.005	”
Disulfoton (Disyton)	0.005	”
Malathion	0.005	”
Methamidophos	0.02	”
Methidathion	0.02	“
Parathion-methyl	0.02	“
Phorate	0.01	“
Phosmet	0.02	“
Neonicotinoids		
Thiamethoxam	.002	“
Imidacloprid	.002	“
Thiacloprid	.002	“
Dinotefuran	.006	“
Acetamiprid	.01	“
Clothianidin	.02	
Herbicides		
Atrazine	0.05	“
Cyanazine	0.20	“
Diuron	0.05	“
Glyphosate	2.0	“
Linuron	0.1	“
Paraquat	0.20	“
Simazine	0.05	“
Trifluralin	0.05	“
Metals (µg/L)		
Arsenic (total) [5,7]	0.3	2 times in both 2017 and 2018, once in dry season and once in wet season of each year, concurrent with water toxicity monitoring
Boron (total) [6,7]	10	“

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Cadmium (total & dissolved) [4.5,7]	0.01	“
Copper (total and dissolved) [4,7]	0.01	“
Lead (total and dissolved) [4,7]	0.01	“
Nickel (total and dissolved) [4,7]	0.02	“
Molybdenum (total) [7]	1	“
Selenium (total)[7]	0.30	“
Zinc (total and dissolved) [4.5,7]	0.10	“
Other (µg/L)		
Total Phenolic Compounds[8]	5	2 times in 2017, once in spring (April-May) and once in fall (August-September)
Hardness (mg/L as CaCO3)	1	“
Total Organic Carbon (ug/L)	0.6	“
SEDIMENT SAMPLING		
Sediment Toxicity - *Hyalella azteca* 10-day static renewal (EPA, 2000)		2 times each year, once in spring (April-May) and once in fall (August-September)
Pyrethroid Pesticides in Sediment (µg/kg)		
Gamma-cyhalothrin	2	2 times in both 2017 and 2018, once in spring (April-May) and once in fall (August-September) of each year, concurrent with sediment toxicity sampling
Lambda-cyhalothrin	2	“
Bifenthrin	2	“
Beta-cyfluthrin	2	“
Cyfluthrin	2	“
Esfenvalerate	2	“
Permethrin	2	“
Cypermethrin	2	“
Danitol	2	“
Fenvalerate	2	“
Fluvalinate	2	“
Other Monitoring in Sediment		
Chlorpyrifos (µg/kg)	2	“
Total Organic Carbon	0.01%	“
		“
Sediment Grain Size Analysis	1%	“

[1]Monitoring is ongoing through all five years of the Order, unless otherwise specified. Monitoring frequency may be used as a guide for developing alternative Sampling and Analysis Plan.
[2]Pesticide list may be modified based on specific pesticide use in Central Coast Region. Analytes on this list must be reported, at a minimum.

[3] Reporting Limit, taken from SWAMP where applicable.
[4] Holmgren, Meyer, Cheney and Daniels. 1993. Cadmium, Lead, Zinc, Copper and Nickel in Agricultural Soils of the United States. J. of Environ. Quality 22:335-348.
[5]Sax and Lewis, ed. 1987. Hawley's Condensed Chemical Dictionary. 11th ed. New York: Van Nostrand Reinhold Co., 1987. Zinc arsenate is an insecticide.
[6]Http://www.coastalagro.com/products/labels/9%25BORON.pdf; Boron is applied directly or as a component of fertilizers as a plant nutrient.
[7]Madramootoo, Johnston, Willardson, eds. 1997. Management of Agricultural Drainage Water Quality. International Commission on Irrigation and Drainage. U.N. FAO. SBN 92-6-104058.3.
[8]http://cat.inist.fr/?aModele=afficheN&cpsidt=14074525; Phenols are breakdown products of herbicides and pesticides. Phenols can be directly toxic and cause endocrine disruption.
[9]See SWAMP field measures SOP, p. 17
mg/L – milligrams per liter; ug/L – micrograms per liter; ug/kg – micrograms per kilogram;
NTU – Nephelometric Turbidity Units; CFS – cubic feet per second;

Table 3. Groundwater Monitoring Parameters

Parameter	RL	Analytical Method[3]	Units
pH	0.1	Field or Laboratory Measurement EPA General Methods	pH Units
Specific Conductance	2.5		µS/cm
Total Dissolved Solids	10		mg/L
Total Alkalinity as CaCO3	1	EPA Method 310.1 or 310.2	
Calcium	0.05	General Cations[1] EPA 200.7, 200.8, 200.9	
Magnesium	0.02		
Sodium	0.1		
Potassium	0.1		
Sulfate (SO4)	1.0	General Anions EPA Method 300 or EPA Method 353.2	
Chloride	0.1		
Nitrate + Nitrite (as N)[2] or Nitrate as N	0.1		

[1]General chemistry parameters (major cations and anions) represent geochemistry of water bearing zone and assist in evaluating quality assurance/quality control of groundwater sampling and laboratory analysis.
[2]The MRP allows analysis of "nitrate plus nitrite" to represent nitrate concentrations (as N). The "nitrate plus nitrite" analysis allows for extended laboratory holding times and relieves the Discharger of meeting the short holding time required for nitrate.
[3]Dischargers may use alternative analytical methods approved by EPA.
RL – Reporting Limit; µS/cm – micro siemens per centimeter

Table4. Tier 2 - Time Schedule for Key Monitoring and Reporting Requirements (MRPs)

REQUIREMENT	TIME SCHEDULE[1]
Submit Sampling And Analysis Plan and Quality Assurance Project Plan (SAAP/QAPP) for Surface Receiving Water Quality Monitoring (*individually or through cooperative monitoring program*)	By March 1, 2018, or as directed by the Executive Officer; satisfied if an approved SAAP/QAPP has been submitted pursuant to Order No. R3-2012-0011 and associated MRPs
Initiate surface receiving water quality monitoring (*individually or through cooperative monitoring program*)	Per an approved SAAP and QAPP
Submit surface receiving water quality monitoring data (*individually or through cooperative monitoring program*)	Each January 1, April 1, July 1, and October 1
Submit surface receiving water quality Annual Monitoring Report *(individually or through cooperative monitoring program*)	By July 12017: annually thereafter by July 1
Initiate monitoring of groundwater wells	First sample from March-June 2017, second sample from September-December 2017
Submit electronic Annual Compliance Form	March 1, 2018 and every March 1 annually thereafter
Submit groundwater monitoring results	Within 60 days of the sample collection
Tier 2 Dischargers with farms/ranches growing high risk crops: Report total nitrogen applied on the Total Nitrogen Applied form	March 1, 2018 and every March 1annually thereafter

[1] Dates are relative to adoption of this Order or enrollment date for Dischargers enrolled after the adoption of this Order, unless otherwise specified.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

MONITORING AND REPORTING PROGRAM
ORDER NO. R3-2017-0002-03

TIER 3

DISCHARGERS ENROLLED UNDER
CONDITIONAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR
DISCHARGES FROM IRRIGATED LANDS

This Monitoring and Reporting Program Order No. R3-2017-0002-03 (MRP) is issued pursuant to California Water Code (Water Code) sections 13267 and 13269, which authorize the California Regional Water Quality Control Board, Central Coast Region (hereafter Central Coast Water Board) to require preparation and submittal of technical and monitoring reports. Water Code section 13269 requires a waiver of waste discharge requirements to include as a condition, the performance of monitoring and the public availability of monitoring results. *Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands,* Order No. R3-2017-0002 (Order), includes criteria and requirements for three tiers. This MRP sets forth monitoring and reporting requirements for **Tier 3 Dischargers** enrolled under the Order. A summary of the requirements is shown below.

SUMMARY OF MONITORING AND REPORTING REQUIREMENTS FOR TIER 3:

Part 1: Surface Receiving Water Monitoring and Reporting *(cooperative or individual)*
Part 2: Groundwater Monitoring and Reporting *(cooperative or individual)*
Total Nitrogen Applied Reporting *(required for subset of Tier 3 Dischargers if farm/ranch growing any crop with high nitrate loading risk to groundwater);*
Part 3: Annual Compliance Form
Part 5: Individual Surface Water Discharge Monitoring and Reporting
Part 6: Irrigation and Nutrient Management Plan *(required for subset of Tier 3 Dischargers if farm/ranch has High Nitrate Loading Risk)*
Part 7: Water Quality Buffer Plan *(required for subset of Tier 3 Dischargers if farm/ranch contains or is adjacent to a waterbody impaired for temperature, turbidity or sediment)*

Pursuant to Water Code section 13269(a)(2), monitoring requirements must be designed to support the development and implementation of the waiver program, including, but not limited to, verifying the adequacy and effectiveness of the waiver's conditions. The monitoring and reports required by this MRP are to evaluate effects of discharges of waste from irrigated agricultural operations and individual farms/ranches on waters of the state and to determine compliance with the Order.

MONITORING AND REPORTING BASED ON TIERS

The Order and MRP includes criteria and requirements for three tiers, based upon those characteristics of the individual farms/ranches at the operation that present the highest level of waste discharge or greatest risk to water quality. Dischargers must meet conditions of the Order and MRP for the appropriate tier that applies to their land and/or the individual farm/ranch. Within a tier, Dischargers comply with requirements based on the specific level of discharge and threat to water quality from individual farms/ranches. The lowest tier, Tier 1, applies to dischargers who discharge the lowest level of waste (amount or concentration) or pose the lowest potential to cause or contribute to an exceedance of water quality standards in waters of the State or of the United States. The highest tier, Tier 3, applies to dischargers who discharge the highest level of waste or pose the greatest potential to cause or contribute to an exceedance of water quality standards in waters of the State or of the United States. Tier 2 applies to dischargers whose discharge has a moderate threat to water quality. Water quality is defined in terms of regional, state, or federal numeric or narrative water quality standards. Per the Order, Dischargers may submit a request to the Executive Officer to approve transfer to a lower tier. If the Executive Officer approves a transfer to a lower tier, any interested person may request that the Central Coast Water Board conduct a review of the Executive Officer’s determination.

PART 1. SURFACE RECEIVING WATER MONITORING AND REPORTING REQUIREMENTS

The surface receiving water monitoring and reporting requirements described herein are generally a continuation of the surface receiving water monitoring and reporting requirements of Monitoring and Reporting Program Order No. 2012-0011-03, as revised August 22, 2016, with the intent of uninterrupted regular monitoring and reporting during the transition from Order No. R3-2012-0011-03 to Order No. R3-2017-0002-03.

Monitoring and reporting requirements for surface receiving water identified in Part 1.A. and Part 1.B. apply to Tier 3 Dischargers. Surface receiving water refers to water flowing in creeks and other surface waters of the State. Surface receiving water monitoring may be conducted through a cooperative monitoring program on behalf of Dischargers, or Dischargers may choose to conduct surface receiving water monitoring and reporting individually. Key monitoring and reporting requirements for surface receiving water are shown in Tables 1 and 2. Time schedules are shown in Table 5.

A. Surface Receiving Water Quality Monitoring

1. Dischargers must elect a surface receiving water monitoring option (cooperative monitoring program or individual receiving water monitoring) to comply with surface receiving water quality monitoring requirements, and identify the option selected on the Notice of Intent (NOI).

2. Dischargers are encouraged to choose participation in a cooperative monitoring program (e.g., the existing Cooperative Monitoring Program or a similar program) to comply with receiving water quality monitoring requirements. Dischargers not participating in a cooperative monitoring program must conduct surface receiving water quality monitoring individually that achieves the same purpose.

3. Dischargers (individually or as part of a cooperative monitoring program) must conduct surface receiving water quality monitoring to a) assess the impacts of their waste discharges from irrigated lands to receiving water, b) assess the status of receiving water quality and beneficial use protection in impaired waterbodies dominated by irrigated agricultural activity, c) evaluate status, short term patterns and long term trends (five to ten years or more) in receiving water quality, d) evaluate water quality impacts resulting from agricultural discharges (including but not limited to tile drain discharges), e) evaluate stormwater quality, f) evaluate condition of existing perennial, intermittent, or ephemeral streams or riparian or wetland area habitat, including degradation resulting from erosion or agricultural discharges of waste, and g) assist in the identification of specific sources of water quality problems.

<u>Surface Receiving Water Quality Sampling and Analysis Plan</u>

4. **By March 1, 2018, or as directed by the Executive Officer**, Dischargers (individually or as part of a cooperative monitoring program) must submit a surface receiving water quality Sampling and Analysis Plan (SAAP) and Quality Assurance Project Plan (QAPP); this requirement is satisfied if an approved SAAP and QAPP addressing all surface receiving water quality monitoring requirements described in this Order has been submitted pursuant to Order No.R3-2012-0011 and associated Monitoring and Reporting Programs. Dischargers (or a third party cooperative monitoring program) must develop the Sampling and Analysis Plan to describe how the proposed monitoring will achieve the objectives of the MRP and evaluate compliance with the Order. The Sampling and Analysis Plan may propose alternative monitoring site locations, adjusted monitoring parameters, and other changes as necessary to assess the impacts of waste discharges from irrigated lands to receiving water. The Executive Officer must approve the Sampling and Analysis Plan and QAPP.

5. The Sampling and Analysis Plan must include the following minimum required components:
    a. Monitoring strategy to achieve objectives of the Order and MRP;
    b. Map of monitoring sites with GIS coordinates;

c. Identification of known water quality impairments and impaired waterbodies per the 2010 Clean Water Act 303(d) List of Impaired Waterbodies (List of Impaired Waterbodies);
d. Identification of beneficial uses and applicable water quality standards;
e. Identification of applicable Total Maximum Daily Loads;
f. Monitoring parameters;
g. Monitoring schedule, including description and frequencies of monitoring events;
h. Description of data analysis methods;

6. The QAPP must include receiving water and site-specific information, project organization and responsibilities, and quality assurance components of the MRP. The QAPP must also include the laboratory and field requirements to be used for analyses and data evaluation. The QAPP must contain adequate detail for project and Water Board staff to identify and assess the technical and quality objectives, measurement and data acquisition methods, and limitations of the data generated under the surface receiving water quality monitoring. All sampling and laboratory methodologies and QAPP content must be consistent with U.S. EPA methods, State Water Board's Surface Water Ambient Monitoring Program (SWAMP) protocols and the Central Coast Water Board's Central Coast Ambient Monitoring Program (CCAMP). Following U.S. EPA guidelines[1] and SWAMP templates[2], the receiving water quality monitoring QAPP must include the following minimum required components:
    a. Project Management. This component addresses basic project management, including the project history and objectives, roles and responsibilities of the participants, and other aspects.
    b. Data Generation and Acquisition. This component addresses all aspects of project design and implementation. Implementation of these elements ensures that appropriate methods for sampling, measurement and analysis, data collection or generation, data handling, and quality control activities are employed and are properly documented. Quality control requirements are applicable to all the constituents sampled as part of the MRP, as described in the appropriate method.
    c. Assessment and Oversight. This component addresses the activities for assessing the effectiveness of the implementation of the project and associated QA and QC activities. The purpose of the assessment is to provide project oversight that

[1] USEPA. 2001 (2006) USEPA Requirements for Quality Assurance Project Plans (QA/R-5) Office of Environmental Information, Washington, D.C. USEPA QA/R-5
[2] http://waterboards.ca.gov/water_issues/programs/swamp/tools.shtml#qa

will ensure that the QA Project Plan is implemented as prescribed.

d. Data Validation and Usability. This component addresses the quality assurance activities that occur after the data collection, laboratory analysis and data generation phase of the project is completed. Implementation of these elements ensures that the data conform to the specified criteria, thus achieving the MRP objectives.

7. The Central Coast Water Board may conduct an audit of contracted laboratories at any time in order to evaluate compliance with the QAPP.

8. The Sampling and Analysis Plan and QAPP, and any proposed revisions are subject to approval by the Executive Officer. The Executive Officer may also revise the Sampling and Analysis Plan, including adding, removing, or changing monitoring site locations, changing monitoring parameters, and other changes as necessary to assess the impacts of waste discharges from irrigated lands to receiving water.

Surface Receiving Water Quality Monitoring Sites

9. The Sampling and Analysis Plan must, at a minimum, include monitoring sites to evaluate waterbodies identified in Table 1, unless otherwise approved by the Executive Officer. The Sampling and Analysis Plan must include sites to evaluate receiving water quality impacts most directly resulting from areas of agricultural discharge (including areas receiving tile drain discharges). Site selection must take into consideration the existence of any long term monitoring sites included in related monitoring programs (e.g. CCAMP and the existing CMP). Sites may be added or modified, subject to prior approval by the Executive Officer, to better assess the pollutant loading from individual sources or the impacts to receiving waters caused by individual discharges. Any modifications must consider sampling consistency for purposes of trend evaluation.

Surface Receiving Water Quality Monitoring Parameters

10. The Sampling and Analysis Plan must, at a minimum, include the following types of monitoring and evaluation parameters listed below and identified in Table 2:

    a. Flow Monitoring;
    b. Water Quality (physical parameters, metals, nutrients, pesticides);
    c. Toxicity (water and sediment);
    d. Assessment of Benthic Invertebrates.

11. All analyses must be conducted at a laboratory certified for such analyses by the State Department of Public Health (CDPH) or at laboratories approved by the Executive Officer. Unless otherwise noted, all sampling, sample preservation, and analyses must be performed in accordance with the latest edition of *Test Methods for Evaluating Solid Waste*, SW-846, U.S. EPA, and analyzed as specified herein by the above analytical methods and reporting limits indicated. Certified laboratories can be found at the web link: http://www.cdph.ca.gov/certlic/labs/Documents/ELAPLablist.xls

12. Water quality and flow monitoring is used to assess the sources, concentrations, and loads of waste discharges from individual farms/ranches and groups of Dischargers to surface waters, to evaluate impacts to water quality and beneficial uses, and to evaluate the short term patterns and long term trends in receiving water quality. Monitoring data must be compared to existing numeric and narrative water quality objectives.

13. Toxicity testing is to evaluate water quality relative to the narrative toxicity objective. Water column toxicity analyses must be conducted on 100% (undiluted) sample. At sites where persistent unresolved toxicity is found, the Executive Officer may require concurrent toxicity and chemical analyses and a Toxicity Identification Evaluation (TIE) to identify the individual discharges causing the toxicity.

Surface Receiving Water Quality Monitoring Frequency and Schedule

14. The Sampling and Analysis Plan must include a schedule for sampling. Timing, duration, and frequency of monitoring must be based on the land use, complexity, hydrology, and size of the waterbody. Table 2 includes minimum monitoring frequency and parameter lists. Agricultural parameters that are less common may be monitored less frequently. Modifications to the receiving water quality monitoring parameters, frequency, and schedule may be submitted for Executive Officer consideration and approval. At a minimum, the Sampling and Analysis Plan schedule must consist of monthly monitoring of common agricultural parameters in major agricultural areas, including two major storm events during the wet season (October 1 – April 30).

15. Storm event monitoring must be conducted within 18 hours of storm events, preferably including the first flush run-off event that results in significant increase in stream flow. For purposes of this MRP, a storm event is defined as precipitation producing onsite runoff (surface water flow) capable of creating significant ponding, erosion or other water quality problem. A

significant storm event will generally result in greater than 1-inch of rain within a 24-hour period.

16. Dischargers (individually or as part of a cooperative monitoring program) must perform receiving water quality monitoring per the Sampling and Analysis Plan and QAPP approved by the Executive Officer.

B. Surface Receiving Water Quality Reporting

<u>Surface Receiving Water Quality Data Submittal</u>

1. Dischargers (individually or as part of a cooperative monitoring program) must submit water quality monitoring data to the Central Coast Water Board electronically, in a format specified by the Executive Officer and compatible with SWAMP/CCAMP electronic submittal guidelines, each January 1, April 1, July 1, and October 1.

<u>Surface Receiving Water Quality Monitoring Annual Report</u>

2. By July 1, 2017, and every July 1 annually thereafter, Dischargers (individually or as part of a cooperative monitoring program) must submit an Annual Report, electronically, in a format specified by the Executive Officer including the following minimum elements:
   a. Signed Transmittal Letter;
   b. Title Page;
   c. Table of Contents;
   d. Executive Summary;
   e. Summary of Exceedance Reports submitted during the reporting period;
   f. Monitoring objectives and design;
   g. Monitoring site descriptions and rainfall records for the time period covered;
   h. Location of monitoring sites and map(s);
   i. Tabulated results of all analyses arranged in tabular form so that the required information is readily discernible;
   j. Summary of water quality data for any sites monitored as part of related monitoring programs, and used to evaluate receiving water as described in the Sampling and Analysis Plan.
   k. Discussion of data to clearly illustrate compliance with the Order and water quality standards;
   l. Discussion of short term patterns and long term trends in receiving water quality and beneficial use protection;

m. Evaluation of pesticide and toxicity analyses results, and recommendation of candidate sites for Toxicity Identification Evaluations (TIEs);
n. Identification of the location of any agricultural discharges observed discharging directly to surface receiving water;
o. Laboratory data submitted electronically in a SWAMP/CCAMP comparable format;
p. Sampling and analytical methods used;
q. Copy of chain-of-custody forms;
r. Field data sheets, signed laboratory reports, laboratory raw data;
s. Associated laboratory and field quality control samples results;
t. Summary of Quality Assurance Evaluation results;
u. Specify the method used to obtain flow at each monitoring site during each monitoring event;
v. Electronic or hard copies of photos obtained from all monitoring sites, clearly labeled with site ID and date;
w. Conclusions.

PART 2. GROUNDWATER MONITORING AND REPORTING REQUIREMENTS

Groundwater monitoring may be conducted through a cooperative monitoring and reporting program on behalf of growers, or Dischargers may choose to conduct groundwater monitoring and reporting individually. Qualifying cooperative groundwater monitoring and reporting programs must implement the groundwater monitoring and reporting requirements described in this Order, unless otherwise approved by the Executive Officer. An interested person may seek review by the Central Coast Water Board of the Executive Officer's approval or denial of a cooperative groundwater monitoring and reporting program.

Key monitoring and reporting requirements for groundwater are shown in Table 3.

A. Groundwater Monitoring

1. Dischargers must sample private domestic wells and the primary irrigation well on their farm/ranch to evaluate groundwater conditions in agricultural areas, identify areas at greatest risk for nitrogen loading and exceedance of drinking water standards, and identify priority areas for follow up actions.

2. Dischargers must sample at least one groundwater well for each farm/ranch on their operation, including groundwater wells that are located within the property boundary of the enrolled county assessor parcel numbers (APNs). For farms/ranches with multiple groundwater wells, Dischargers must sample all domestic wells and the primary irrigation well. For the purposes of this MRP, a "domestic well" is any well that is used or may be used for domestic

use purposes, including any groundwater well that is connected to a residence, workshop, or place of business that may be used for human consumption, cooking, or sanitary purposes. Groundwater monitoring parameters must include well screen interval depths (if available), general chemical parameters, and general cations and anions listed in Table 3.

3. Dischargers must conduct two rounds of monitoring of required groundwater wells during calendar year 2017; one sample collected during spring (**March - June)** and one sample collected during fall **(September - December)**.

4. Groundwater samples must be collected by a qualified third party (e.g., consultant, technician, person conducting cooperative monitoring) using proper sampling methods, chain-of-custody, and quality assurance/quality control protocols. Groundwater samples must be collected at or near the well head before the pressure tank and prior to any well head treatment. In cases where this is not possible, the water sample must be collected from a sampling point as close to the pressure tank as possible, or from a cold-water spigot located before any filters or water treatment systems.

5. Laboratory analyses for groundwater samples must be conducted by a State certified laboratory according to U.S. EPA approved methods; unless otherwise noted, all monitoring, sample preservation, and analyses must be performed in accordance with the latest edition of *Test Methods for Evaluating Solid Waste*, SW-846, United States Environmental Protection Agency, and analyzed as specified herein by the above analytical methods and reporting limits indicated. Certified laboratories can be found at the web link below: http://www.waterboards.ca.gov/centralcoast/water_issues/programs/ag_waivers/docs/resources4growers/2016_04_11_labs.pdf

6. If a discharger determines that water in any domestic well exceeds 10 mg/L of nitrate as N, the discharger or third party must provide notice to the Central Coast Water Board within 24 hours of learning of the exceedance. For domestic wells on a Discharger's farm/ranch that exceed 10 mg/L nitrate as N, the Discharger must provide written notification to the users within 10 days of learning of the exceedance and provide written confirmation of the notification to the Central Coast Water Board.

   The drinking water notification must include the statement that the water poses a human health risk due to elevated nitrate concentration, and include a warning against the use of the water for drinking or cooking. In addition, Dischargers must also provide prompt written notification to any new well users (e.g. tenants and employees with access to the affected well), whenever there is a change in occupancy.

For all other domestic wells not on a Discharger's property, the Central Coast Water Board will notify the users promptly.

The drinking water notification and confirmation letters required by this Order are available to the public.

B. Groundwater Reporting

1. **Within 60 days of sample collection,** Dischargers must coordinate with the laboratory to submit the following groundwater monitoring results and information, electronically, using the Water Board's GeoTracker electronic deliverable format (EDF):
    a. GeoTracker Ranch Global Identification Number
    b. Field point name (Well Name)
    c. Field Point Class (Well Type)
    d. Latitude
    e. Longitude
    f. Sample collection date
    g. Analytical results
    h. Well construction information (e.g., total depth, screened intervals, depth to water), as available

2. Dischargers must submit groundwater well information required in the electronic Notice of Intent (eNOI) for each farm/ranch and update the eNOI to reflect changes in the farm/ranch information within 30 days of the change. Groundwater well information reported on the eNOI includes, but is not limited to:
    a. Number of groundwater wells present at each farm/ranch
    b. Identification of any groundwater wells abandoned or destroyed (including method destroyed) in compliance with the Order
    c. Use for fertigation or chemigation
    d. Presence of back flow prevention devices
    e. Number of groundwater wells used for agricultural purposes
    f. Number of groundwater wells used for or may be used for domestic use purposes (domestic wells)

C. Total Nitrogen Applied Reporting

1. By March 1, 2018, and by March 1 annually thereafter, Tier 3 Dischargers growing any crop with a high potential to discharge nitrogen to groundwater must record and report total nitrogen applied for each specific crop that was irrigated and grown for commercial purposes on that farm/ranch during the preceding calendar year (January through December).

    Crops with a high potential to discharge nitrogen to groundwater are: beet, broccoli, cabbage, cauliflower, celery, Chinese cabbage (napa), collard, endive, kale, leek, lettuce (leaf and head), mustard, onion (dry and green), spinach, strawberry, pepper (fruiting), and parsley.

Total nitrogen applied must be reported on the Total Nitrogen Applied Report form as described in the Total Nitrogen Applied Report form instructions.

Total nitrogen applied includes any product containing any form or concentration of nitrogen including, but not limited to, organic and inorganic fertilizers, slow release products, compost, compost teas, manure, and extracts.

2. The Total Nitrogen Applied Report form includes the following information:
    a. General ranch information such as GeoTracker file numbers, name, location, acres.
    b. Nitrogen concentration of irrigation water
    c. Nitrogen applied in pounds per acre with irrigation water
    d. Nitrogen present in the soil
    e. Nitrogen applied with compost and amendments
    f. Specific crops grown
    g. Nitrogen applied in pounds per acre with fertilizers and other materials to each specific crop grown
    h. Crop acres of each specific crop grown
    i. Whether each specific crop was grown organically or conventionally
    j. Basis for the nitrogen applied
    k. Explanation and comments section
    l. Certification statement with penalty of perjury declaration
    m. Additional information regarding whether each specific crop was grown in a nursery, greenhouse, hydroponically, in containers, and similar variables.

PART 3. ANNUAL COMPLIANCE FORM

Tier 3 Dischargers must submit annual compliance information, electronically, on the Annual Compliance Form. The purpose of the electronic Annual Compliance Form is to provide information to the Central Coast Water Board to assist in the evaluation of threat to water quality from individual agricultural discharges of waste and measure progress towards water quality improvement and verify compliance with the Order and MRP. Time schedules are shown in Table 5.

A. Annual Compliance Form

1. **By March 1, 2018, and updated annually thereafter by March 1**, Tier 3 Dischargers must submit an Annual Compliance Form electronically, in a format specified by the Executive Officer. The electronic Annual Compliance Form includes, but is not limited to the following minimum requirements[1]:
    a. Question regarding consistency between the Annual Compliance Form and the electronic Notice of Intent (eNOI);
    b. Information regarding type and characteristics of discharge (e.g., number of discharge points, estimated flow/volume, number of tailwater days);
    c. Identification of any direct agricultural discharges to a stream, lake, estuary, bay, or ocean;
    d. Identification of specific farm water quality management practices completed, in progress, and planned to address water quality impacts caused by discharges of waste including irrigation management, pesticide management, nutrient management, salinity management, stormwater management, and sediment and erosion control to achieve compliance with this Order; and identification of specific methods used, and described in the Farm Plan consistent with Order Provision 44.g., for the purposes of assessing the effectiveness of management practices implemented and the outcomes of such assessments:
    e. Proprietary information question and justification;
    f. Authorization and certification statement and declaration of penalty of perjury.

PART 5. INDIVIDUAL SURFACE WATER DISCHARGE MONITORING AND REPORTING REQUIREMENTS

Monitoring and reporting requirements for individual surface water discharge identified in Part 5.A. and Part 5.B. apply to Tier 3 Dischargers with irrigation water or stormwater discharges to surface water from an outfall. Outfalls are locations where irrigation water and stormwater exit a farm/ranch, or otherwise leave the control of the discharger, after being conveyed by pipes, ditches, constructed swales, tile drains, containment structures, or other discrete structures or features that transport the water. Discharges that have commingled with discharges from another farm/ranch are considered to have left the control of the discharger. Key monitoring and reporting requirements for individual surface water discharge are shown in Tables 4A and 4B. Time schedules are shown in Table 5.

[1] Items reported in the Annual Compliance Form are due by March 1 2018, and annually thereafter, unless otherwise specified.

A. Individual Surface Water Discharge Monitoring

1. Tier 3 Dischargers must conduct individual surface water discharge monitoring to a) evaluate the quality of individual waste discharges, including concentration and load of waste (in kilograms per day) for appropriate parameters, b) evaluate effects of waste discharge on water quality and beneficial uses, and c) evaluate progress towards compliance with water quality improvement milestones in the Order.

<u>Individual Sampling and Analysis Plan</u>

2. **By March 1, 2018, or as directed by the Executive Officer**, Tier 3 Dischargers must submit an individual surface water discharge Sampling and Analysis Plan (SAAP) and QAPP to monitor individual discharges of irrigation water and stormwater that leaves their farm/ranch from an outfall. The Sampling and Analysis Plan and QAPP must be submitted to the Executive Officer; this requirement is satisfied if an approved SAAP and QAPP addressing all individual surface water discharge monitoring requirements described in this Order has been submitted pursuant to Order No.R3-2012-0011 and associated Monitoring and Reporting Programs.

3. The Sampling and Analysis Plan must include the following minimum required components to monitor irrigation water and stormwater discharges:
    a. Number and location of outfalls (identified with latitude and longitude or on a scaled map);
    b. Number and location of monitoring points;
    c. Description of typical irrigation runoff patterns;
    d. Map of discharge and monitoring points;
    e. Sample collection methods;
    f. Monitoring parameters;
    g. Monitoring schedule and frequency of monitoring events;

4. The QAPP must include appropriate methods for sampling, measurement and analysis, data collection or generation, data handling, quality control activities, and documentation.

5. The Sampling and Analysis Plan and QAPP, and any proposed revisions are subject to approval by the Executive Officer. The Executive Officer may require modifications to the Sampling and Analysis Plan or Tier 3 Dischargers may propose Sampling and Analysis Plan modifications for Executive Officer approval, when modifications are justified to accomplish the objectives of the MRP.

Individual Surface Water Discharge Monitoring Points

6. Tier 3 Dischargers must select monitoring points to characterize at least 80% of the estimated maximum irrigation run-off discharge volume from each farm/ranch based on that farm's/ranch's typical discharge patterns[1], including tailwater discharges and discharges from tile drains. Sample must be taken when irrigation activity is causing maximal run-off. Load estimates will be generated by multiplying flow volume of discharge by concentration of contaminants. Tier 3 Dischargers must include at least one monitoring point from each farm/ranch which drains areas where chlorpyrifos or diazinon are applied, and monitoring of runoff or tailwater must be conducted within one week of chemical application. If discharge is not routinely present, Discharger may characterize typical run-off patterns in the Annual Report. See Table 4A for additional details.

7. Tier 3 Dischargers must also monitor storage ponds and other terminal surface water containment structures that collect irrigation and stormwater runoff, unless the structure is (1) part of a tail-water return system where a major portion of the water in such structure is reapplied as irrigation water, or (2) the structure is primarily a sedimentation pond by design with a short hydraulic residence time (96 hours or less) and a discharge to surface water when functioning. If multiple ponds are present, sampling must cover at least those structures that would account for 80% of the maximum storage volume of the containment features. See Table 4B for additional details. Where water is reapplied as irrigation water. Dischargers shall document reuse in the Farm Plan.

Individual Surface Water Discharge Monitoring Parameters, Frequency, and Schedule

8. Tier 3 Dischargers must conduct monitoring for parameters, laboratory analytical methods, frequency and schedule described in Tables 4A and 4B. Dischargers may utilize in-field water testing instruments/equipment as a substitute for laboratory analytical methods if the method is approved by U.S. EPA, meets reporting limits (RL) and practical quantitation limits (PQL) specifications in the MRP, and appropriate sampling methodology and quality assurance checks can be applied to ensure that QAPP standards are met to ensure accuracy of the test.

[1] The requirement to select monitoring points to characterize at least 80% of the estimated maximum irrigation run-off based on typical discharge patterns is for the purposes of attempting to collect samples that represent a majority of the volume of irrigation run-off discharged; however the Board recognizes that predetermining these locations is not always possible and that sampling results may vary. The MRP does not specify the number or location of monitoring points to provide maximum flexibility for growers to determine how many sites necessary and exact locations are given the anticipated site-specific conditions.

9. Tier 3 Dischargers must initiate individual surface water discharge monitoring per an approved Sampling and Analysis Plan and QAPP, unless otherwise directed by the Executive Officer.

B. Individual Surface Water Discharge Reporting

Individual Surface Water Discharge Monitoring Data Submittal

By March 1, 2018, and annually thereafter by March 1, Tier 3 Dischargers must submit individual surface water discharge monitoring data and information to the Central Coast Water Board electronically, in a pdf format, containing at least the following items, or as otherwise approved by the Executive Officer:

a. Electronic laboratory data
- All reports of results must contain Ranch name and Global ID, site name(s), project contact, and date.
- Electronic laboratory data reports of chemical results shall include analytical results, as well as associated quality assurance data including method detection limits, reporting limits, matrix spikes, matrix spike duplicates, laboratory blanks, and other quality assurance results required by the analysis method.
- Electronic laboratory data reports of toxicity results shall include summary results comparable to those required in a CEDEN file delivery, including test and control results. For each test result, the mean, associated control performance, calculated percent of control, statistical test results and determination of toxicity, must be included. Test results must specify the control ID used to calculate statistical outcomes.
- Field data results, including temperature, pH, conductivity, turbidity and flow measurements, any field duplicates or blanks, and field observations.
- Calculations of un-ionized ammonia concentrations
- Calculations of total flow and pollutant loading (for nitrate, pesticides if sampled, total ammonia, and turbidity) (include formulas);

b. Narrative description of typical irrigation runoff patterns;
c. Location of sampling sites and map(s);
d. Sampling and analytical methods used;
e. Specify the method used to obtain flow at each monitoring site during each monitoring event;
f. Photos obtained from all monitoring sites, clearly labeled with location and date;
g. Sample chain-of-custody forms do not need to be submitted but must be made available to Central Coast Water Board staff, upon request.

PART 6. IRRIGATION AND NUTRIENT MANAGEMENT PLAN

Monitoring and reporting requirements related to the Irrigation and Nutrient Management Plan (INMP) identified in Part 6.A., and 6.B, apply to Tier 3 Dischargers identified by the Executive Officer that are newly enrolled in Order No. R3-2017-0002, and Tier 3 Dischargers that were subject to Irrigation and Nutrient Management Plan Requirements in Order R3-2012-0011 per MRP Order No. R3-2012-0011-03 Time schedules are shown in Table 5.

A. Irrigation and Nutrient Management Plan Monitoring

1. Tier 3 Dischargers required in Order No. R3-2012-0011 to develop and initiate implementation of an Irrigation and Nutrient Management Plan (INMP) certified by a Professional Soil Scientist, Professional Agronomist, or Crop Advisor certified by the American Society of Agronomy, or similarly qualified professional, are required to update (as necessary) and implement their INMP throughout the term of this Order.

2. The Executive Officer will assess whether an INMP is required for new Tier 3 Dischargers that enroll in Order No. R3-2017-0002 during the term of the Order. The Executive Officer will use the criteria established in Order No. R3-2012-0011 to make this assessment. If a Tier 3 Discharger is required to develop an INMP, the Tier 3 discharger must develop and initiate implementation of an Irrigation and Nutrient Management Plan (INMP) certified by a Professional Soil Scientist, Professional Agronomist, or Crop Advisor certified by the American Society of Agronomy, or similarly qualified professional, **within 18 months** of the Executive Officer's assessment of the INMP requirement.
3. The purpose of the INMP is to budget and manage the nutrients applied to each farm/ranch considering all sources of nutrients, crop requirements, soil types, climate, and local conditions in order to minimize nitrate loading to surface water and groundwater in compliance with this Order. The professional certification of the INMP must indicate that the relevant expert has reviewed all necessary documentation and testing results, evaluated total nitrogen applied relative to typical crop nitrogen uptake and nitrogen removed at harvest, with consideration to potential nitrate loading to groundwater, and conducted field verification to ensure accuracy of reporting.
4. Tier 3 Dischargers required to develop and initiate implementation an (INMP) must include the following elements in the INMP. The INMP is not submitted to the Central Coast Water Board, with the exception of the INMP Effectiveness Report:
    a. Proof of INMP certification;
    b. Map locating each farm/ranch;
    c. Identification of crop nitrogen uptake values for use in nutrient balance calculations;

d. Record keeping annually by either Method 1 or Method 2:

e. To meet the requirement to record total nitrogen in the soil,dischargers may take a nitrogen soil sample (e.g. laboratory analysis or nitrate quick test) or use an alternative method to evaluate nitrogen content in soil, prior to planting or seeding the field or prior to the time of pre-sidedressing, or at an alternative time when it is most effective to determine nitrogen present in the soil that is available for the next crop and to minimize nitrate leaching to groundwater. The amount of nitrogen remaining in the soil must be accounted for as a source of nitrogen when budgeting, and the soil sample or alternative method results must be maintained in the INMP.

f. Identification of irrigation and nutrient management practices in progress (identify start date), completed (identify completion date), and planned (identify anticipated start date) to reduce nitrate loading to groundwater to achieve compliance with this Order.

g. Description of methods Discharger will use to verify overall effectiveness of the INMP.

5. Tier 3 Dischargers must evaluate the effectiveness of the INMP. Irrigation and Nutrient Management Plan effectiveness monitoring must evaluate reduction in new nitrogen[1] loading potential based on minimized fertilizer use and improved irrigation and nutrient management practices in order to minimize new nitrogen loading to surface water and groundwater. Evaluation methods used may include, but are not limited to analysis of groundwater well monitoring data or soil sample data, or analysis of trends in new nitrogen application data.

B. Irrigation and Nutrient Management Plan Reporting

1. **By March 1, 2019**, Tier 3 Dischargers required to develop and initiate implementation of an INMP must submit an INMP Effectiveness Report to evaluate reductions in nitrate loading to surface water and groundwater based on the implementation of irrigation and nutrient management practices in a format specified by the Executive Officer. Dischargers in the same groundwater basin or subbasin may choose to comply with this requirement as a group by submitting a single report that evaluates the overall effectiveness of the broad scale implementation of irrigation and nutrient management practices identified in individual INMPs to protect groundwater. Group efforts must use data from each farm/ranch (e.g., data from individual groundwater wells, soil samples, or nitrogen application). The INMP

[1] New nitrogen is nitrogen from fertilizers, amendments, and other nitrogen sources applied other than nitrogen present in groundwater.

Effectiveness Report must include a description of the methodology used to evaluate and verify effectiveness of the INMP.

PART 7. WATER QUALITY BUFFER PLAN

Monitoring and reporting requirements related to the Water Quality Buffer Plan identified in Part 7.A. and Part 7.B. apply to Tier 3 Dischargers that have farms/ranches *that contain or are adjacent to waterbody identified on the List of Impaired Waterbodies as impaired for temperature, turbidity, or sediment).* Time schedules are shown in Table 5.

A. **Water Quality Buffer Plan**

1. **By 18 months following enrollment in Order No. R3-2017-0002 of a Tier 3 farm/ranch**, Tier 3 Dischargers adjacent to or containing a waterbody identified on the List of Impaired Waterbodies as impaired for temperature, turbidity or sediment must submit a Water Quality Buffer Plan (WQBP) to the Executive Officer that protects the listed waterbody and its associated perennial and intermittent tributaries. The purpose of the Water Quality Buffer Plan is to prevent waste discharge, comply with water quality standards (e.g., temperature, turbidity, sediment), and protect beneficial uses in compliance with this Order and the following Basin Plan requirement:

   Basin Plan (Chapter 5, p. V-13, Section V.G.4 – Erosion and Sedimentation, *"A filter strip of appropriate width, and consisting of undisturbed soil and riparian vegetation or its equivalent, must be maintained, wherever possible, between significant land disturbance activities and watercourses, lakes, bays, estuaries, marshes, and other water bodies. For construction activities, minimum width of the filter strip must be thirty feet, wherever possible…."*

2. The Water Quality Buffer Plan must include the following or the functional equivalent, to address discharges of waste and associated water quality impairments:

   a. A minimum 30 foot buffer (as measured horizontally from the top of bank on either side of the waterway, or from the high water mark of a lake and mean high tide of an estuary);
   b. Any necessary increases in buffer width to adequately prevent the discharge of waste that may cause or contribute to any excursion above or outside the acceptable range for any Regional, State, or Federal numeric or narrative water quality standard (e.g., temperature, turbidity);

c. Any buffer less than 30 feet must provide equivalent water quality protection and be justified based on an analysis of site-specific conditions and be approved by the Executive Officer;
d. Identification of any alternatives implemented to comply with this requirement, that are functionally equivalent to described buffer;
e. Schedule for implementation;
f. Maintenance provisions to ensure water quality protection;
g. Annual photo monitoring;

2. The WQPB must be submitted using the Water Quality Buffer Plan form, or, if an alternative to the WQBP is submitted, in a format approved by the Executive Officer.

3. **By March 1, 2019**, Tier 3 Dischargers that submitted a WQBP pursuant to Order No. R3-2012-0011 or Order No. R3-2017-0002, are required to update (as necessary) and implement their WQBP, and annually submit a WQBP Status Report of their WQBP implementation using the Water Quality Buffer Plan form, or, if an alternative to the WQBP was submitted, an Alternative to WQBP Status Report, electronically, in a format approved by the Executive Officer.

PART 8. GENERAL MONITORING AND REPORTING REQUIREMENTS

A. Submittal of Technical Reports

1. Dischargers must submit reports in a format specified by the Executive Officer (reports will be submitted electronically, unless otherwise specified by the Executive Officer). A transmittal letter must accompany each report, containing the following penalty of perjury statement signed by the Discharger or the Discharger's authorized agent:

   "In compliance with Water Code §13267, I certify under penalty of perjury that this document and all attachments were prepared by me, or under my direction or supervision following a system designed to assure that qualified personnel properly gather and evaluate the information submitted. To the best of my knowledge and belief, this document and all attachments are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment".

2. If the Discharger asserts that all or a portion of a report submitted pursuant to this Order is subject to an exemption from public disclosure (e.g. trade secrets or secret processes), the Discharger must provide an explanation of how those portions of the reports are exempt from public disclosure. The

Discharger must clearly indicate on the cover of the report (typically an electronic submittal) that the Discharger asserts that all or a portion of the report is exempt from public disclosure, submit a complete report with those portions that are asserted to be exempt in redacted form, submit separately (in a separate electronic file) unredacted pages (to be maintained separately by staff). The Central Coast Water Board staff will determine whether any such report or portion of a report qualifies for an exemption from public disclosure. If the Central Coast Water Board staff disagrees with the asserted exemption from public disclosure, the Central Coast Water Board staff will notify the Discharger prior to making such report or portions of such report available for public inspection.

B. Central Coast Water Board Authority

1. Monitoring reports are required pursuant to section 13267 of the California Water Code. Pursuant to section 13268 of the Water Code, a violation of a request made pursuant to section 13267 may subject you to civil liability of up to $1000 per day.

2. The Water Board needs the required information to determine compliance with Order No.R3-2017-0002. The evidence supporting these requirements is included in the findings of Order No.R3-2017-0002.

____
John M. Robertson
Executive Officer

____
Date

Table 1. Major Waterbodies in Agricultural Areas[1]

Hydrologic SubArea	Waterbody Name	Hydrologic SubArea	Waterbody Name
30510	Pajaro River	30920	Quail Creek
30510	Salsipuedes Creek	30920	Salinas Reclamation Canal
30510	Watsonville Slough	31022	Chorro Creek
30510	Watsonville Creek[2]	31023	Los Osos Creek
30510	Beach Road Ditch[2]	31023	Warden Creek
30530	Carnadero Creek	31024	San Luis Obispo Creek
30530	Furlong Creek[2]	31024	Prefumo Creek
30530	Llagas Creek	31031	Arroyo Grande Creek
30530	Miller's Canal	31031	Los Berros Creek
30530	San Juan Creek	31210	Bradley Canyon Creek
30530	Tesquisquita Slough	31210	Bradley Channel
30600	Moro Cojo Slough	31210	Green Valley Creek
30910	Alisal Slough	31210	Main Street Canal
30910	Blanco Drain	31210	Orcutt Solomon Creek
30910	Old Salinas River	31210	Oso Flaco Creek
30910	Salinas River (below Gonzales Rd.)	31210	Little Oso Flaco Creek
30920	Salinas River (above Gonzales Rd. and below Nacimiento R.)	31210	Santa Maria River
30910	Santa Rita Creek[2]	31310	San Antonio Creek[2]
30910	Tembladero Slough	31410	Santa Ynez River
30920	Alisal Creek	31531	Bell Creek
30920	Chualar Creek	31531	Glenn Annie Creek
30920	Espinosa Slough	31531	Los Carneros Creek[2]
30920	Gabilan Creek	31534	Arroyo Paredon Creek
30920	Natividad Creek	31534	Franklin Creek

[1] At a minimum, monitoring sites must be included for these waterbodies in agricultural areas, unless otherwise approved by the Executive Officer. Monitoring sites may be proposed for addition or modification to better assess the impacts of waste discharges from irrigated lands to surface water. Dischargers choosing to comply with surface receiving water quality monitoring, individually (not part of a cooperative monitoring program) must only monitor sites for waterbodies receiving the discharge.
[2] These creeks are included because they are newly listed waterbodies on the 2010 303(d) list of Impaired Waters that are associated with areas of agricultural discharge.

Table 2. Surface Receiving Water Quality Monitoring Parameters

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Photo Monitoring		
Upstream and downstream photographs at monitoring location		With every monitoring event
<u>WATER COLUMN SAMPLING</u> **Physical Parameters and General Chemistry**		
Flow (field measure) (CFS) following SWAMP field SOP[9]	.25	Monthly, including 2 stormwater events
pH (field measure)	0.1	”
Electrical Conductivity (field measure) (µS/cm)	2.5	”
Dissolved Oxygen (field measure) (mg/L)	0.1	”
Temperature (field measure) (^oC)	0.1	”
Turbidity (NTU)	0.5	”
Total Dissolved Solids (mg/L)	10	”
Total Suspended Solids (mg/L)	0.5	”
Nutrients		
Total Nitrogen (mg/L)	0.5	Monthly, including 2 stormwater events
Nitrate + Nitrite (as N) (mg/L)	0.1	”
Total Ammonia (mg/L)	0.1	”
Unionized Ammonia (calculated value, mg/L))		”
Total Phosphorus (as P) (mg/L)	0.02	
Soluble Orthophosphate (mg/L)	0.01	”
Water column chlorophyll a (µg/L)	1.0	“
Algae cover, Floating Mats, % coverage	-	“
Algae cover, Attached, % coverage	-	“
Water Column Toxicity Test		
Algae - *Selenastrum capricornutum (*96-hour chronic; Method1003.0 in EPA/821/R-02/013)	-	4 times each year, twice in dry season, twice in wet season
Water Flea – *Ceriodaphnia dubia* (7-day chronic; Method 1002.0 in EPA/821/R-02/013)	-	”
Midge - *Chironomus spp.* (96-hour acute; Alternate test species in EPA 821-R-02-012)	-	“

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Toxicity Identification Evaluation (TIE)	-	As directed by Executive Officer
Pesticides[2] /Herbicides (µg/L)		
Organophosphate Pesticides		
Azinphos-methyl	0.02	2 times in both 2017 and 2018, once in dry season and once in wet season of each year, concurrent with water toxicity monitoring
Chlorpyrifos	0.005	”
Diazinon	0.005	”
Dichlorvos	0.01	”
Dimethoate	0.01	”
Dimeton-s	0.005	”
Disulfoton (Disyton)	0.005	”
Malathion	0.005	”
Methamidophos	0.02	”
Methidathion	0.02	“
Parathion-methyl	0.02	“
Phorate	0.01	“
Phosmet	0.02	“
Neonicotinoids		
Thiamethoxam	.002	“
Imidacloprid	.002	“
Thiacloprid	.002	“
Dinotefuran	.006	“
Acetamiprid	.01	“
Clothianidin	.02	
Herbicides		
Atrazine	0.05	“
Cyanazine	0.20	“
Diuron	0.05	“
Glyphosate	2.0	“
Linuron	0.1	“
Paraquat	0.20	“
Simazine	0.05	“
Trifluralin	0.05	“
Metals (µg/L)		
Arsenic (total) [5,7]	0.3	2 times in both 2017 and 2018, once in dry season and once in wet season of each year, concurrent with water toxicity monitoring
Boron (total) [6,7]	10	“
Cadmium (total & dissolved) [4.5,7]	0.01	“

Parameters and Tests	RL[3]	Monitoring Frequency[1]
Copper (total and dissolved) [4,7]	0.01	"
Lead (total and dissolved) [4,7]	0.01	"
Nickel (total and dissolved) [4,7]	0.02	"
Molybdenum (total) [7]	1	"
Selenium (total)[7]	0.30	"
Zinc (total and dissolved) [4.5,7]	0.10	"
Other (µg/L)		
Total Phenolic Compounds[8]	5	2 times in 2017, once in spring (April-May) and once in fall (August-September)
Hardness (mg/L as CaCO3)	1	"
Total Organic Carbon (ug/L)	0.6	"
SEDIMENT SAMPLING		
Sediment Toxicity - *Hyalella azteca* 10-day static renewal (EPA, 2000)		2 times each year, once in spring (April-May) and once in fall (August-September)
Pyrethroid Pesticides in Sediment (µg/kg)		
Gamma-cyhalothrin	2	2 times in both 2017 and 2018, once in spring (April-May) and once in fall (August-September) of each year, concurrent with sediment toxicity sampling
Lambda-cyhalothrin	2	"
Bifenthrin	2	"
Beta-cyfluthrin	2	"
Cyfluthrin	2	"
Esfenvalerate	2	"
Permethrin	2	"
Cypermethrin	2	"
Danitol	2	"
Fenvalerate	2	"
Fluvalinate	2	"
Other Monitoring in Sediment		
Chlorpyrifos (µg/kg)	2	"
Total Organic Carbon	0.01%	"
		"
Sediment Grain Size Analysis	1%	"

[1]Monitoring is ongoing through all five years of the Order, unless otherwise specified. Monitoring frequency may be used as a guide for developing alternative Sampling and Analysis Plan.
[2]Pesticide list may be modified based on specific pesticide use in Central Coast Region. Analytes on this list must be reported, at a minimum.
[3] Reporting Limit, taken from SWAMP where applicable.

[4] Holmgren, Meyer, Cheney and Daniels. 1993. Cadmium, Lead, Zinc, Copper and Nickel in Agricultural Soils of the United States. J. of Environ. Quality 22:335-348.
[5]Sax and Lewis, ed. 1987. Hawley's Condensed Chemical Dictionary. 11th ed. New York: Van Nostrand Reinhold Co., 1987. Zinc arsenate is an insecticide.
[6]Http://www.coastalagro.com/products/labels/9%25BORON.pdf; Boron is applied directly or as a component of fertilizers as a plant nutrient.
[7]Madramootoo, Johnston, Willardson, eds. 1997. Management of Agricultural Drainage Water Quality. International Commission on Irrigation and Drainage. U.N. FAO. SBN 92-6-104058.3.
[8]http://cat.inist.fr/?aModele=afficheN&cpsidt=14074525; Phenols are breakdown products of herbicides and pesticides. Phenols can be directly toxic and cause endocrine disruption.
[9]See SWAMP field measures SOP, p. 17
mg/L – milligrams per liter; ug/L – micrograms per liter; ug/kg – micrograms per kilogram;
NTU – Nephelometric Turbidity Units; CFS – cubic feet per second;

Table 3. Groundwater Monitoring Parameters

Parameter	RL	Analytical Method[3]	Units
pH	0.1	Field or Laboratory Measurement EPA General Methods	pH Units
Specific Conductance	2.5		µS/cm
Total Dissolved Solids	10		mg/L
Total Alkalinity as $CaCO_3$	1	EPA Method 310.1 or 310.2	
Calcium	0.05	General Cations[1] EPA 200.7, 200.8, 200.9	
Magnesium	0.02		
Sodium	0.1		
Potassium	0.1		
Sulfate (SO_4)	1.0	General Anions EPA Method 300 or EPA Method 353.2	
Chloride	0.1		
Nitrate + Nitrite (as N)[2] *or* Nitrate as N	0.1		

[1]General chemistry parameters (major cations and anions) represent geochemistry of water bearing zone and assist in evaluating quality assurance/quality control of groundwater monitoring and laboratory analysis.
[2]The MRP allows analysis of "nitrate plus nitrite" to represent nitrate concentrations (as N). The "nitrate plus nitrite" analysis allows for extended laboratory holding times and relieves the Discharger of meeting the short holding time required for nitrate.
[3]Dischargers may use alternative analytical methods approved by EPA.
RL – Reporting Limit; µS/cm – micro siemens per centimeter

Table 4A. Individual Discharge Monitoring for Tailwater, Tile drain, and Stormwater Discharges

Parameter	Analytical Method[1]	Maximum PQL	Units	Min Monitoring Frequency
Discharge Flow or Volume	Field Measure	---	CFS	(a) (d)
Approximate Duration of Flow	Calculation	---	hours/month	
Temperature (water)	Field Measure	0.1	°Celsius	
pH	Field Measure	0.1	pH units	

Electrical Conductivity	Field Measure	100	µS/cm	
Turbidity	SM 2130B, EPA 180.1	1	NTUs	
Nitrate + Nitrite (as N)	EPA 300.1, EPA 353.2	0.1	mg/L	
Ammonia	SM 4500 NH3, EPA 350.3	0.1	mg/L	
Chlorpyrifos[2]	EPA 8141A, EPA 614	0.02	ug/L	(b) (c) (d)
Diazinon[2]				
Ceriodaphnia Toxicity (96-hr acute)	EPA-821-R-02-012	NA	% Survival	
Hyalella Toxicity in Water (96-hr acute)	EPA-821-R-02-012	NA	% Survival	

[1] In-field water testing instruments/equipment as a substitute for laboratory analysis if the method is approved by EPA, meets RL/PQL specifications in the MRP, and appropriate sampling methodology and quality assurance checks can be applied to ensure that QAPP standards are met to ensure accuracy of the test.
[2]If chlorpyrifos or diazinon is used at the farm/ranch, otherwise does not apply. The Executive Officer may require monitoring of other pesticides based on results of downstream receiving water monitoring.
(a) Two times per year during primary irrigation season for farms/ranches less than or equal to 500 acres, and four times per year during primary irrigation season for farms/ranches greater than 500 acres. Executive Officer may reduce sampling frequency based on water quality improvements.
(b) Once per year during primary irrigation season for farms/ranches less than or equal to 500 acres, and two times per year during primary irrigation season for farms/ranches greater than 500 acres.
(c) Sample must be collected within one week of chemical application, if chemical is applied on farm/ranch;
(d) Once per year during wet season (October – March) for farms/ranches less than or equal to 500 acres, and two times per year during wet season for farms/ranches greater than 500 acres, within 18 hours of major storm events;
CFS – Cubic feet per second; NTU – Nephelometric turbidity unit; PQL – Practical Quantitation Limit;
NA – Not applicable

Table 4B. Individual Discharge Monitoring for Tailwater Ponds and other Surface Containment Features

Parameter	Analytical Method[1]	Maximum PQL	Units	Minimum Monitoring Frequency
Volume of Pond	Field Measure	1	Gallons	(a) (d)
Nitrate + Nitrite (as N)	EPA 300.1, EPA 353.2	50	mg/L	

[1] In-field water testing instruments/equipment as a substitute for laboratory analysis if the method is approved by EPA, meets RL/PQL specifications in the MRP, and appropriate sampling methodology and quality assurance checks can be applied to ensure that QAPP standards are met to ensure accuracy of the test.
(a) Four times per year during primary irrigation season; Executive Officer may reduce monitoring frequency based on water quality improvements.
(d) Two times per year during wet season (October – March, within 18 hours of major storm events)

Table 5. Tier 3 - Time Schedule for Key Monitoring and Reporting Requirements (MRPs)

REQUIREMENT	TIME SCHEDULE[1]
Submit Sampling And Analysis Plan and Quality Assurance Project Plan (SAAP/QAPP) for Surface Receiving Water Quality Monitoring (*individually or*	By March 1, 2018, or as directed by the Executive Officer; satisfied if an approved SAAP/QAPP has been submitted pursuant

through cooperative monitoring program)	to Order No. R3-2012-0011 and associated MRPs
Initiate surface receiving water quality monitoring (*individually or through cooperative monitoring program*)	Per an approved SAAP and QAPP
Submit surface receiving water quality monitoring data (*individually or through cooperative monitoring program*)	Each January 1, April 1, July 1, and October 1
Submit surface receiving water quality Annual Monitoring Report (*individually or through cooperative monitoring program*)	By July 1 2017; annually thereafter by July 1
Initiate monitoring of groundwater wells	First sample from March-June 2017, second sample from September-December 2017
Submit individual surface water discharge SAAP and QAPP	By March 1, 2018 or as directed by the Executive Officer; waived if an approved SAAP and QAPP has been submitted and being implemented pursuant to Order No. R3-2012-0011.
Initiate individual surface water discharge monitoring	As described in an approved SAAP and QAPP
Submit individual surface water discharge monitoring data	March 1, 2018, and every March 1 annually thereafter
Submit electronic Annual Compliance Form	March 1, 2018 and every March 1 annually thereafter
Submit groundwater monitoring results	Within 60 days of the sample collection
Submit Water Quality Buffer Plan or alternative	Within 18 months of enrolling new Tier 3 farm/ranch in Order
Submit Status Report on Water Quality Buffer Plan or alternative	March 1, 2019
Tier 3 Dischargers with farms/ranches growing high risk crops:	
Report total nitrogen applied on the Total Nitrogen Applied form	March 1, 2018 and every March 1 annually thereafter
Submit INMP Effectiveness Report	March 1, 2019

[1] Dates are relative to adoption of this Order, unless otherwise specified.

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

PROPOSED GENERAL WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES FROM IRRIGATED LANDS

ORDER NO. R3-2021-0040

April XX, 2021

ORDER

Table of Contents

Attachments

Attachment A – Additional Findings and Regulatory Considerations
Attachment B – Monitoring and Reporting Program (MRP)
Attachment C – Acronyms, Abbreviations, and Definitions

THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL COAST REGION FINDS:

Part 1, Section A. Findings

Background and Purpose

1. As described in the Water Quality Control Plan for the Central Coastal Basin (Basin Plan), the central coast region of California represents approximately 7.2 million acres of land. There are approximately 540,000 acres of irrigated land and approximately 3,000 agricultural operations that may be generating wastewater that falls into the category of discharges of waste from irrigated lands.

2. The central coast region has more than 17,000 miles of surface waters (linear streams/rivers) and approximately 4,000 square miles of groundwater basins that are, or may be, affected by discharges of waste from irrigated lands. Of the nine hydrologic regions in the state, the central coast region is the most groundwater dependent region with approximately 86% of its water supply being derived from groundwater.

3. The State Water Resources Control Board (State Water Board) and Regional Water Quality Control Boards (Regional Water Boards) are the principal state agencies with primary responsibility for the coordination and control of water quality for the health, safety and welfare of the people of the state pursuant to the Porter-Cologne Water Quality Control Act (Porter-Cologne Act, codified in Water Code Division 7). The legislature, in the Porter-Cologne Act, directed the state, through the Water Boards, to exercise its full power and jurisdiction to protect the quality of the waters in the state from degradation and to attain the highest water quality which is reasonable, considering all demands being made and to be made on those waters and the total values involved, beneficial and detrimental, economic and social, tangible and intangible, and considering precipitation, topography, population, recreation, agriculture, industry, and economic development (Water Code section 13000).

4. Since the issuance of the first Agricultural Order in 2004 and subsequent Agricultural Orders in 2012 and 2017, the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) has compiled additional and substantial empirical data demonstrating that water quality conditions in agricultural areas of the region continue to be severely impaired or polluted by waste discharges from irrigated agricultural operations and activities that impair beneficial uses. The main impacts from irrigated agriculture in the central coast region are nitrate discharges to groundwater and associated drinking water impacts, nutrient discharges to surface water, pesticide discharges

and associated toxicity, sediment discharges, and degradation of riparian and wetland areas and the associated impairment or loss of beneficial uses.

5. The objectives of this Order are:

   a. Protect and restore beneficial uses and achieve water quality objectives specified in the Basin Plan for commercial irrigated agricultural areas in the central coast region by:
      i. Minimizing nitrate discharges to groundwater,
      ii. Minimizing nutrient discharges to surface water,
      iii. Minimizing toxicity in surface water from pesticide[1] discharges,
      iv. Protecting riparian and wetland habitat, and
      v. Minimizing sediment discharges to surface water.
   b. Effectively track and quantify achievement of 5.a.i through 5.a.v over a specific, defined time schedule.
   c. Comply with the State's Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (NPS Policy), the State Antidegradation Policy, relevant court decisions such as those pertaining to Coastkeeper *et al* lawsuits, the precedential language in the Eastern San Joaquin Watershed Agricultural Order, and other relevant statutes and water quality plans and policies, including total maximum daily loads in the central coast region.

6. This Order regulates discharges of waste from irrigated lands by requiring individuals subject to this Order to comply with the terms and conditions set forth herein to ensure that such discharges do not cause or contribute to the exceedance of any regional, state, or federal numeric or narrative water quality objectives or impair any beneficial uses in waters of the state and of the United States.

7. Water Code section 13260(a) requires that any person discharging waste or proposing to discharge waste that could affect the quality of the waters of the state, other than into a community sewer system, must file with the appropriate Regional Board a report of waste discharge (ROWD) containing such information and data as may be required by the Central Coast Water Board, unless the Central Coast Water Board waives such requirement.

8. Water Code section 13263(a) requires the Central Coast Water Board to prescribe waste discharge requirements (WDRs), or waive WDRs, for the discharge. The requirements must implement the Basin Plan and must take into

[1] A pesticide is any substance intended to control, destroy, repel, or otherwise mitigate a pest. The term pesticide is inclusive of all pest and disease management products, including insecticides, herbicides, fungicides, nematicides, rodenticides, algicides, etc.

consideration the beneficial uses to be protected and the water quality objectives reasonably required for that purpose, other waste discharges, the need to prevent nuisance, and the provisions of Water Code section 13241.

9. Water Code section 13263(b) states that, in prescribing requirements, the Central Coast Water Board need not authorize the utilization of the full waste assimilation capacities of the receiving waters.

10. This Order does not create a vested right to discharge; all discharges are a privilege, not a right, as described in Water Code section 13263(g).

11. Water Code section 13263(i) authorizes the Central Coast Water Board to prescribe general WDRs for a category of discharges if the Central Coast Water Board finds or determines that all the criteria listed below apply to the discharges in that category. Discharges associated with irrigated agricultural operations that will be regulated under this Order are consistent with these criteria and therefore a general order is appropriate.

    a. The discharges are produced by the same or similar operations.
    b. The discharges involve the same or similar type of waste.
    c. The discharges require the same or similar treatment standards.
    d. The discharges are more appropriately regulated under general WDRs than individual WDRs.

12. Water Code section 13243 authorizes the Central Coast Water Board, in WDRs, to specify certain conditions or areas where the discharge of waste, or certain types of waste, will not be permitted.

13. Water Code section 13267(a) authorizes the Central Coast Water Board to, in establishing or reviewing waste discharge requirements, or in connection with any action to any plan or requirement authorized by the Porter-Cologne Act, investigate the quality of any waters of the state within the region. The monitoring and reporting requirements as set forth in Attachment B are established under Water Code section 13267(b).

14. Water Code section 13267(c) authorizes the Central Coast Water Board or its authorized representatives to, in conducting an investigation of the quality of waters of the state within the region, inspect the facilities of the Discharger upon consent, issuance of a warrant, or in an emergency affecting public health or safety, to ascertain compliance with this Order and to ascertain whether the purpose of the Porter-Cologne Act are being met. Inspections under Water Code section 13267(c) include sampling and monitoring.

15. Water Code section 13304 authorizes the Central Coast Water Board to, upon making the requisite findings, issue a cleanup and abatement order (CAO) that

requires Dischargers to provide emergency and long-term alternative water supplies or replacement water service, including wellhead treatment, to each affected public water supplier or private well owners. A CAO is a separate action from this Order; this Order does not require Dischargers to provide alternative water supplies or replacement water.

Public Participation Process

16. In August 2017, Central Coast Water Board staff held a series of listening sessions throughout the central coast region to solicit stakeholder input on potential improvements to the previous agricultural order. The Central Coast Water Board discussed the input received from stakeholders during the September 2017 board meeting.

17. In February 2018, the Central Coast Water Board published an initial study to begin soliciting input related to environmental review for the California Environmental Quality Act (CEQA), in preparation for developing a draft Environmental Impact Report (EIR). A 73-day public comment period was held for the initial study. In March 2018, Central Coast Water Board staff held a series of public CEQA scoping meetings throughout the region. Input received during the public comment period and public scoping meetings has been considered in the development of the draft EIR.

18. In March and May 2018, Central Coast Water Board meetings included informational items dedicated to a review of water quality conditions associated with agricultural activities and discharges. The March 2018 informational item focused on surface water quality conditions and agricultural discharges and the May 2018 informational item focused on groundwater quality conditions and nitrate impacts to groundwater. Both informational items incorporated presentations from several outside speakers.

19. In September 2018, the Central Coast Water Board’s public meeting was dedicated to a workshop for agricultural order stakeholders. Panels of agricultural, environmental, and environmental justice representatives gave presentations to the board in response to a series of questions staff proposed:

    a. What can growers and the regional board do to demonstrate quantifiable progress to minimize nitrate discharge to groundwater to achieve water quality objectives?
    b. What can growers and the regional board do to demonstrate quantifiable progress to minimize nutrient discharge to surface waters to achieve water quality objectives?
    c. What can growers and the regional board do to demonstrate quantifiable progress to minimize toxicity in surface waters from pesticide discharges to achieve water quality objectives?

d. What can growers and the regional board do to ensure that riparian and wetland habitat is protected due to agricultural activities and discharges?
e. What can growers and the regional board do to demonstrate quantifiable progress to minimize sediment discharge to achieve water quality objectives?
f. How can the regional board use discharge permit requirements to ensure current and future affordable, safe, and clean water for drinking and environmental uses?

20. In November 2018, the Central Coast Water Board published a set of five conceptual options tables that serve as the Central Coast Water Board's framework to address the questions posed in the September 2018 meeting. The Central Coast Water Board reviewed and discussed the options tables during its public meeting in November, and a 64-day written public comment period was subsequently held to solicit detailed stakeholder input. Central Coast Water Board staff held a series of outreach meetings throughout the region during the comment period.

21. In March 2019, after the 64-day public comment period, the Central Coast Water Board published updated versions of the five conceptual options tables. During the public meetings in March and May 2019, the Central Coast Water Board discussed the updated tables and received additional stakeholder comment.

22. In September 2019, during its public meeting, the Central Coast Water Board held a workshop focused on co-managing food safety and environmental protection, the role of riparian vegetation in water quality and beneficial use protection, and Discharger experiences with food safety challenges.

23. On February 21, 2020, the Central Coast Water Board published the draft Order and draft EIR and began a 45-day public comment period. The comment period was extended twice and closed on June 22, 2020.

24. In June 2020, Central Coast Water Board staff conducted three outreach meetings, which included presentations of the draft Order and draft EIR, and a question and answer session for attendees. These outreach meetings were conducted virtually via the Zoom platform, due to the COVID-19 pandemic.

25. Beginning on September 10, 2020 and continuing to January 8, 2021, the Central Coast Water Board held 10 days of Board meetings to receive oral comments from the public and to discuss the draft Order. During these meetings, three of which were devoted entirely to receiving public comment and Board engagement with stakeholders, the Board deliberated on the draft Order using a consensus-based approach through which they directed staff on the development of a revised Order.

26. On January 26, 2021, the Central Coast Water Board circulated a revised draft Order for a 30-day public comment period that closed on February 25, 2021. Central Coast Water Board staff subsequently considered the public comments and developed a proposed Order for Board consideration during an April 14-16, 2021, public hearing.

27. The Central Coast Water Board, in a public hearing held on April 14-16, 2021, has heard and considered all comments pertaining to the discharge and proposed Order.

28. After considering all comments pertaining to this General Permit during a public hearing on April 14-16, 2021, this Order was found consistent with the findings in this Part 1 and Attachment A.

29. Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Board to review the action in accordance with California Water Code section 13320 and title 23 California Code of Regulations sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., within 30 calendar days of the date of adoption of this Order at the following address, except that if the thirtieth day following the date of adoption falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day:

    State Water Resources Control Board
    Office of Chief Counsel
    P.O. Box 100, 1001 I Street
    Sacramento, CA 95812-0100

    Or by email at **waterqualitypetitions@waterboards.ca.gov**

    For instructions on how to file a petition for review, see **http://www.waterboards.ca.gov/public_notices/petitions/water_quality/wqpetition_instr.shtml**.

Scope of Order

Irrigated Lands and Agricultural Discharges Regulated Under this Order

30. This Order regulates (1) discharges of waste from commercial irrigated lands, including, but not limited to, land planted to row, vineyard, field and tree crops where water is applied for producing commercial crops; (2) discharges of waste from commercial nurseries, nursery stock production, and greenhouse operations with soil floors that do not have point source-type discharges and are not currently operating under individual WDRs; and (3) discharges of waste from

lands that are planted to commercial crops that are not yet marketable, such as vineyards and tree crops.

31. Discharges from irrigated lands regulated by this Order include discharges to surface water and groundwater, through mechanisms such as irrigation return flows, percolation, tailwater, tile drain water, stormwater runoff flowing from irrigated lands, stormwater runoff conveyed in channels or canals resulting from the discharge from irrigated lands, and runoff resulting from frost control or operational spills. These discharges can contain wastes that could affect the quality of waters of the state and impair beneficial uses.

32. This Order also regulates agricultural activities such as the removal or degradation of riparian vegetation resulting in the loss or degradation of instream beneficial uses.

Dischargers Regulated Under this Order

33. This Order regulates both landowners and operators of commercial irrigated lands on or from which there are discharges of waste or activities that could affect the quality of any surface water or groundwater or result in the impairment of beneficial uses (Dischargers). Dischargers are responsible for complying with the conditions of this Order. Both the landowner and the operator of the irrigated agricultural land are Dischargers under this Order. The Central Coast Water Board will hold both the landowner and the operator liable for noncompliance with this Order, regardless of whether the landowner or the operator is the party to enroll under this Order.

34. For the purposes of this Order, irrigated lands producing commercial crops are those operations that have one or more of the following characteristics:

    a. The landowner or operator has obtained a pesticide use permit from a local County Agricultural Commissioner;
    b. The crop is sold, including but not limited to 1) an industry cooperative, 2) a harvest crew/company, or 3) a direct marketing location, such as certified Farmers Markets;
    c. The federal Department of Treasury Internal Revenue Service for 1040 Schedule F Profit or Loss from Farming is used to file federal taxes.

35. The electronic Notice of Intent (eNOI) serves as a report of waste discharge (ROWD) for the purposes of this Order.

36. The Central Coast Water Board recognizes that certain limited resource growers[2] (as defined by the U.S. Department of Agriculture) may have difficulty achieving

[2] The term “Limited Resource Farmer or Rancher” means a participant:

compliance with this Order. The Central Coast Water Board will prioritize assistance for these growers, including but not limited to technical assistance, grant opportunities, and necessary flexibility to achieve compliance with this Order (e.g., adjusted monitoring, reporting, or time schedules).

Agricultural Dischargers Not Covered Under this Order and Who Must Apply for Individual Waste Discharge Requirements

37. This Order does not cover point source-type discharges from commercial nurseries, nursery stock production, greenhouses, or other operations. This Order does not cover discharges of waste from fully contained greenhouse operations (i.e., those that have no groundwater discharge due to impermeable floors but may have other discharges associated with the operation). These operations must either eliminate all such discharges of waste or submit a ROWD to apply for individual WDRs as set forth in Water Code section 13260.

Enforcement for Noncompliance

38. The State Water Board's Water Quality Enforcement Policy (Enforcement Policy) describes progressive enforcement action for violations of WDRs when appropriate. However, the Enforcement Policy recommends formal enforcement as a first response to more significant violations. Progressive enforcement is an escalating series of actions that allows for the efficient and effective use of enforcement resources to 1) assist cooperative Dischargers in achieving compliance; 2) compel compliance for repeat violations and recalcitrant violators; and 3) provide a disincentive for noncompliance. Progressive enforcement actions may begin with informal enforcement actions such as a verbal, written, or electronic communication between the Central Coast Water Board and a Discharger. The purpose of an informal enforcement action is to quickly bring the violation to the Discharger's attention and to give the Discharger an opportunity to return to compliance as soon as possible. The highest level of informal enforcement is a Notice of Violation.

39. The Enforcement Policy recommends formal enforcement actions for the highest priority violations, chronic violations, and/or threatened violations. Violations of this Order that will be considered a priority include, but are not limited to:

    a. Failure to obtain required regulatory coverage;

- With direct or indirect gross farm sales not more than the current indexed value in each of the previous two years, and
- Who has a total household income at or below the national poverty level for a family of four, or less than 50 percent of county median household income in each of the previous two years.

A Self-Determination Tool is available to the public and may be completed on-line or printed and completed hardcopy at the **USDA website**:
https://lrftool.sc.egov.usda.gov/DeterminationTool.aspx?fyYear=2020

b. Failure to achieve numeric limits;
c. Falsifying information or intentionally withholding information required by applicable laws, regulations, or an enforcement order;
d. Failure to monitor or provide complete and accurate information as required;
e. Failure to pay annual fees, penalties, or liabilities; and
f. Failure to submit required reports on time.

40. Water Code section 13350 provides that any person who violates WDRs may be 1) subject to administrative civil liability imposed by the Central Coast Water Board or State Water Board in an amount of up to $5,000 per day of violation, or up to $10 per gallon of waste discharged; or 2) subject to civil liability imposed by a court in an amount of up to $15,000 per day of violation, or up to $20 per gallon of waste discharged. The actual calculation and determination of administrative civil penalties must be consistent with the Enforcement Policy and the Porter-Cologne Act.

Order Effectiveness Evaluation

41. Water Code section 13263(e) states that for WDRs, "Upon application by any affected person, or on its own motion, the regional board may review and revise requirements. All requirements shall be reviewed periodically." It is the expressed intent of the Central Coast Water Board that its staff and, as appropriate, third-party groups or programs provide annual updates to the board during public meetings regarding the implementation of this Order. The purpose of the updates is to evaluate and report out on individual discharger and third-party group compliance; identify successes, challenges, and emerging science and management practices; consider potential Order modifications as may be appropriate at five-year intervals; and generally inform the Board and public regarding the Order's effectiveness towards achieving the stated objectives.

Additional Findings and Regulatory Considerations

42. Attachment A to this Order, incorporated herein, includes additional findings that further describe the Water Board's legal and regulatory authority; compliance with CEQA requirements; applicable plans and policies adopted by the State Water Board and the Central Coast Water Board that contain regulatory conditions that apply to the discharge of waste from irrigated lands; and the rationale for this Order, including descriptions of the environmental and agricultural resources in the central coast region and impacts to water quality and beneficial uses from agricultural discharges.

43. The Central Coast Water Board encourages Dischargers to participate in third-party groups or programs (e.g., certification program, watershed group, water quality coalition, monitoring coalition, or other third-party effort) to facilitate and document compliance with this Order. Third-party programs can be used to

implement outreach and education, monitoring and reporting, management practice and/or water quality improvement projects. Regionally scaled third-party programs addressing multiple Order requirements are preferred to provide economies of scale to reduce Discharger costs, maximize effectiveness, and streamline Water Board oversight; however, watershed- or basin-scale third-party programs of limited scope may be appropriate under certain circumstances and should be coordinated to the extent practicable for consistency and effectiveness. Commodity group certification programs may also be effective in facilitating compliance with this Order. Dischargers participating in an Executive Officer approved third-party program may be subject to permit fee reductions or alternative compliance pathways that substantively comply with this Order.

44. The Central Coast Water Board acknowledges that it will take time to develop meaningful and effective third-party programs that facilitate compliance with this Order. The Order considers this by allowing an initial grace period for the phasing in of various requirements. The phasing in of various requirements is also intended to allow Water Board staff time to develop online reporting tools and templates and to conduct outreach and education to help Dischargers and service providers come up to speed on the new requirements.

45. Third-party programs are discussed in **Part 2, Section A**. The Central Coast Water Board will provide more detailed third-party expectation documents and/or third-party program requests for proposals (RFPs) to inform and solicit third-party program proposals for Executive Officer consideration.

46. The Executive Officer may make non-substantive changes to the Order to correct typographical errors or to maintain consistency within the Order or between the Order and its Attachments, e.g., to conform changes made during the Order development process that were inadvertently not carried through the entire Order. [The Board will provide public notice of the non-substantive changes.]

IT IS HEREBY ORDERED that Order No. R3-2017-0002 is terminated as of the effective date of this Order except for the purposes of enforcement, and that pursuant to Water Code sections 13260, 13263, and 13267, Dischargers enrolled in this Order, their agents, successors, and assigns, must comply with the following terms and conditions to meet the provisions contained in Water Code Division 7 and regulations, plans, and policies adopted thereunder.

Part 2, Section A. Enrollment, Fees, Termination, General Provisions, and Third-Party Programs

1. This Order is effective upon adoption by the Central Coast Water Board.

2. Except where stated otherwise, all requirements of this Order apply to all Dischargers.

Enrollment

3. Enrollment in this Order requires the submittal of the electronic Notice of Intent (eNOI) pursuant to Water Code section 13260. Submittal of all other technical reports pursuant to this Order is required pursuant to Water Code section 13267. Failure to submit technical reports or the attachments in accordance with the time schedules established by this Order or Monitoring and Reporting Program (MRP), or failure to submit a complete technical report (i.e., of sufficient technical quality to be acceptable to the Executive Officer), may subject the Discharger to enforcement action pursuant to Water Code sections 13261, 13268, or 13350. Dischargers must submit technical reports in the format specified by the Executive Officer.

4. Dischargers who are not currently enrolled in the existing agricultural order must submit to the Central Coast Water Board a complete eNOI prior to discharging. Upon submittal of a complete and accurate eNOI, the Discharger is enrolled under this Order, unless otherwise informed by the Executive Officer.

5. Dischargers who were enrolled in Order R3-2017-0002 as of the effective date of this Order are automatically enrolled in this Order.

6. In the case where an operator may be operating for a period of less than 12 months, the landowner must submit the eNOI. In all other cases, either the landowner or the operator must submit the eNOI. Both the landowner and the operator are Dischargers and considered a responsible party for compliance with the requirements of this Order.

7. **Prior to any discharge or commencement of activities that may cause a discharge**, including land preparation prior to crop production, any Discharger proposing to control or own a new operation or ranch that has the potential to

discharge waste that could directly or indirectly reach waters of the state and/or affect the quality of any surface water and/or groundwater must submit an eNOI.

8. **Within 60 days** of any change in operation or ranch information, the Discharger must update the eNOI.

9. **Within 60 days** of any change in control or ownership of an operation, ranch, or land presently owned or controlled by the Discharger, the Discharger must notify the succeeding owner and operator of the existence of this Order.

10. **Within 60 days** of acquiring control or ownership of an existing operation or ranch, the succeeding Discharger must submit an eNOI.

11. Dischargers must submit all the information required in the eNOI form, including but not limited to the following information for the operation and individual ranch:

    a. Assessor parcel numbers (APNs) covered by enrollment,
    b. Landowner(s),
    c. Operator(s),
    d. Contact information,
    e. Third-party program membership,
    f. Location of operation, including specific ranch(es),
    g. Map with discharge locations and groundwater wells identified,
    h. Type and number of groundwater wells located on ranch parcels,
    i. Total and irrigated acreage,
    j. Crop types grown,
    k. Irrigation system type,
    l. Discharge type,
    m. Chemical use,
    n. Slope,
    o. Impermeable surfaces,
    p. Presence and location of any waterbodies on or adjacent to the ranch.
    q. Status of drinking water notification to well users

12. Dischargers or groups of Dischargers seeking regulatory requirements tailored to their specific operation, ranch, geographic area, or commodity may submit an ROWD to obtain an individual order or MRP, or request the development of a general order for a specific type of discharge (e.g., commodity-specific general order). This Order remains applicable to those Dischargers until the Central Coast Water Board adopts such an individual order, MRP, or general order, and, if applicable, the Dischargers are enrolled in the general order.

13. Dischargers seeking enrollment in this Order must submit a statement of understanding of the conditions of this Order and MRP signed by the Discharger (landowner or operator) with the eNOI. If the operator signs and submits the

electronic NOI, the operator must provide a copy of the complete NOI form to the landowner(s).

14. Coverage under this Order is not transferable to any person except after the succeeding Discharger's submittal to the Central Coast Water Board of an updated eNOI and approval by the Executive Officer.

Fees

15. Dischargers must pay a fee to the State Water Resources Control Board in compliance with the fee schedule contained in Title 23 California Code of Regulations.

16. Dischargers must pay any relevant third-party program fees (e.g., Surface Water Third-Party Monitoring Program (aka Cooperative Monitoring Program or CMP) necessary to comply with monitoring and reporting conditions of this Order or they must comply with monitoring and reporting requirements individually.

17. For Dischargers who choose to participate in a third-party program, failure to pay third-party program fees voids a selection or notification of the option to participate in the third-party program and hence requires Dischargers to immediately comply with individual groundwater protection and/or surface water protection requirements.

Termination

18. **Immediately**, if a Discharger wishes to terminate coverage under this Order for the operation or an individual ranch, the Discharger must submit a complete Notice of Termination (NOT), in a format specified by the Executive Officer. Termination from coverage is the date the termination request is approved, unless specified otherwise. All discharges must cease before the date of termination, and any discharges on or after the date of termination are violations of this Order, unless covered by other WDRs or waivers of WDRs. All required monitoring and reporting are due **within 60 days of the termination or March 1 following the termination date**, whichever is sooner, unless otherwise directed by the Executive Officer.

General Provisions

19. The unauthorized discharge of any waste not specifically regulated by this Order, is prohibited.

20. The discharge of waste at a location or in a manner different from that described in the eNOI is prohibited.

21. Dischargers must comply with the Monitoring and Reporting Program (MRP), incorporated herein as Attachment B.

22. All forms, reports, documents, and laboratory data must be submitted to the Central Coast Water Board electronically through the State Water Board's database systems (e.g., GeoTracker, CEDEN,[3] etc.).

23. Dischargers are defined in this Order as both the landowner and the operator of irrigated agricultural land on or from which there are discharges of waste from irrigated agricultural activities that could affect the quality of any surface water or groundwater. The Central Coast Water Board will hold both the landowner and the operator liable for noncompliance with this Order.

24. The Executive Officer may propose, and the Central Coast Water Board may adopt, individual WDRs for any Discharger at any time.

25. The Central Coast Water Board or the Executive Officer may, at any time, terminate applicability of this Order with respect to an individual Discharger upon written notice to the Discharger.

26. Noncompliance with requirements in this Order is grounds for enforcement action and/or termination of coverage for waste discharges under this Order, subjecting the Discharger to enforcement under the Water Code for further discharges of waste to surface water or groundwater.

27. The fact that it would have been necessary to halt or reduce the permitted discharge activity to maintain compliance with this Order is not a defense for the Discharger's violations of this Order.

28. Provisions of this Order are severable. If any provision of this Order is found invalid, the remainder of this Order will not be affected.

29. Upon the Central Coast Water Board's or Executive Officer's request and within a reasonable timeframe, Dischargers must submit any information required to determine compliance with this Order or to determine whether there is cause for modifying or terminating this Order.

30. Under authority of Water Code section 13267(c), the Discharger must allow the Central Coast Water Board, or an authorized representative, upon consent or other documents as may be required by law, to do the following:

    a. Enter upon the Discharger's premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this Order,

[3] CEDEN is the California Environmental Data Exchange Network.

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order,
c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order, and
d. Collect samples from and monitor waters of the state within or bordering property subject to this Order, at reasonable times for the purposes of assuring compliance with this Order or as otherwise authorized by the Water Code. The sampling and monitoring may include and is not limited to domestic and irrigation wells, surface receiving waters, and edge of field discharges to surface waters.

31. This Order may be reopened to address changes in statutes, regulations, plans, policies, or case law that govern water quality requirements for the discharges regulated herein.

Third-Party Programs

32. Dischargers may comply with portions of this Order by participating in third-party groups or programs (e.g., certification program, watershed group, water quality coalition, monitoring coalition, or other third-party effort) approved by the Executive Officer. In this case, the third-party will assist individual Dischargers in achieving compliance with this Order, including implementing water quality improvement projects and required monitoring and reporting as described in the MRP. Compliance with the requirements of this Order is still required for all members of the third-party program; however, the third-party may propose modified monitoring and reporting for approval by the Executive Officer. Third-party program proposals will be evaluated on a case-by-case basis relative to their ability to document compliance with this Order as part of a request for proposal process and as further informed by a forthcoming third-party expectations document.

33. This Order includes specific provisions and an alternative compliance pathway for third-party programs that will also be subject to a third-party request for proposal process and Executive Officer review and approval. Dischargers participating in a third-party administered alternative compliance pathway program, and that remain in good standing as defined in this Order and/or Executive Officer approved third-party work plan, are subject to the third-party program requirements in lieu of individual requirements as specified. The third-party alternative compliance pathway program's assessment and evaluation for groundwater protection and the regional groundwater quality trend monitoring program described in **Part 2, Section C.1** must be closely aligned and coordinated such that they are effectively measuring the objectives the programs are trying to achieve.

34. Third-party program proposals must include and identify specific membership eligibility requirements, for approval by the Executive Officer, to evaluate whether third-party program members are in good standing. Members that are not in good standing with the membership eligibility requirements lose their membership and must immediately comply with individual groundwater protection and/or surface water protection requirements. At a minimum, third-party program proposals must include membership eligibility requirements and follow-up consequences that are triggered, including revocation of membership eligibility, to address the following scenarios where members are no longer in good standing:

    a. Non-payment of fees
    b. Non-submittal of information
    c. Non-participation in education/outreach or site visits
    d. Failure to implement / adapt management practices

35. Consistent with the Water Board's Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (NPS Policy), the ineffectiveness of a third-party program through which a Discharger participates in nonpoint source control efforts cannot be used as a justification for lack of individual discharger compliance. Dischargers continue to be responsible for complying with this Order individually.

36. Dischargers who elect to join a third-party program to facilitate compliance with this Order must retain their membership with the third-party in good standing. If the Discharger does not meet the requirements of membership in the third-party program, then the Discharger is responsible for complying with all requirements in this Order individually unless the approved third-party administered alternative compliance pathway or approved third-party work plan allows for specific deviations from the individual requirements.

37. Dischargers who elect to join an approved third-party program must notify the approved third-party program administrator of their election to participate in the third-party program within 60 days of: 1) approval of the third-party program, and/or 2) the Discharger's enrollment in this Order, whichever is later.

38. The third-party program administrator must notify the Central Coast Water Board of Dischargers electing to participate within 90 days of the third-party program approval, and then provide member participation updates on a quarterly basis thereafter. At a minimum, participating Discharger information provided to the Central Coast Water Board must include operation enrollment information (e.g., AW numbers and operation names) and ranch enrollment information (e.g., GeoTracker AGL numbers and ranch names) in a format specified by the Executive Officer.

39. Third-party programs must meet the following minimum criteria:

a. Effectiveness of scale and scope – The program must be of sufficient scale and scope relative to its intended purpose to maximize Discharger participation, implementation effectiveness and Order compliance. Although regionally scaled programs are preferred, watershed- or basin-scale programs will be considered as needed to address localized water quality issues.
b. Clearly stated goals and objectives – The program must have meaningful and clearly stated goals, objectives, and associated performance metrics relevant to the Order requirements that are the focus of the program.
c. Management and administration – The program must have a well-defined and robust governance and administrative structure with clearly defined roles and responsibilities.
d. Capacity and expertise – The program must demonstrate sufficient technical, managerial, and financial capacity to successfully achieve its goals and objectives.
e. Physical presence – The program should have a physical presence in the central coast region, including staff and a headquarters, that can assist its members on a continual and as-needed basis. If the third-party program administrator does not have or plan to have a physical presence in the region, they must demonstrate they can effectively establish, maintain, and engage with core membership without a headquarters in the central coast region.
f. Transparency and accountability – The program must provide regular assessments of its performance relative to its stated goals and objective based on meaningful performance metrics. This includes reporting of water quality data and farm-level data as needed to document compliance with this Order.
g. Membership and fee accounting – The program must track and provide ongoing accounting of its Discharger membership and fees to document Discharger compliance.
h. Data management – The program must upload data as required by this Order to the Water Boards' various data management systems (e.g., CEDEN, GeoTracker, etc.).
i. Member requirements – The program must have clearly stated and enforced Discharger membership eligibility requirements and report out on them as needed to document compliance.
j. Coordination – The program must consider and coordinate with other third-party programs/groups or local entities as may be appropriate to create consistency; leverage the efforts, infrastructure and expertise of others; and streamline the program to maximize effectiveness (e.g., coordination with Groundwater Sustainability Agencies [GSAs], flood control management agencies, watershed restoration and management entities, etc.).
k. Continuing education – The program must include continuing education opportunities as appropriate either directly through the program or through

coordination with other third-party programs/groups or local entities to ensure its members obtain technical skills and assistance necessary to achieve compliance with the limits established in this Order. In the instance of third-party monitoring programs, membership outreach and education should be implemented to inform members about the monitoring results relative to meeting specific water quality objectives, numeric targets, numeric interim quantifiable milestones, or numeric limits.

l. Specific project plan documents – The program must have a detailed work plan including a Quality Assurance Project Plan (QAPP) and Sampling and Analysis Plan (SAP) as may be appropriate based on the program goals and objectives and associated Order requirements.

40. The Central Coast Water Board's review of third-party program proposals will consider the criteria outlined above relative to overall program effectiveness, with an emphasis on approving programs that can effectively assist their members in complying with the requirements of this Order.

Part 2, Section B. Planning, Education, Management Practices, and CEQA

Farm Water Quality Management Plan (Farm Plan)

1. Dischargers must develop, implement, and update as necessary a Farm Water Quality Management Plan (Farm Plan) for each ranch. A current copy of the Farm Plan must be maintained by the Discharger and must be submitted to the Central Coast Water Board upon request. At a minimum, the Farm Plan must include the discrete sections listed below. Additional details regarding each section are included in subsequent sections of this Order. Certain elements included in the Farm Plan must be reported on; however, in general, the Farm Plan is a planning and recordkeeping tool used by Dischargers to manage various aspects of their agricultural operation.

   a. Irrigation and Nutrient Management Plan (INMP)
   b. Pesticide Management Plan (PMP)
   c. Sediment and Erosion Management Plan (SEMP)
   d. Water Quality Education
   e. CEQA Mitigation Measure Implementation

2. The INMP, PMP, and SEMP sections of the Farm Plan must include information on management practice implementation and assessment. Elements of the INMP are reported on in the Total Nitrogen Applied report or INMP Summary report. Elements of all the sections listed above are reported on in the Annual Compliance Form (ACF). Additional information on the monitoring and reporting requirements related to each of these sections is included in the MRP.

3. Where required by the Executive Officer based on groundwater quality or surface water quality conditions or exceedances of the numeric targets, numeric interim quantifiable milestones, or numeric limits established in this Order, the Farm Plan must incorporate ranch-level groundwater or surface water discharge monitoring information described in the MRP. The ranch-level groundwater and surface water discharge monitoring must be designed and implemented to inform improved management practices to protect groundwater and surface water quality.

4. Dischargers must maintain all records related to compliance with this Order for a minimum of ten years. Records include, but are not limited to, monitoring information, calculations, management practice implementation and assessment, education records, and all required reporting and information used to submit complete and accurate reports. Third parties that have been approved by the Executive Officer to assist Dischargers with complying with this Order, for example in the form of water quality monitoring, must also maintain all records for a minimum of ten years. Records must be submitted to the Central Coast Water Board upon request or as required by this Order or an approved work plan.

Continuing Education

5. Dischargers must attend outreach and education events annually to obtain technical skills and assistance necessary to achieve compliance with the numeric targets, numeric interim quantifiable milestones, and numeric limits established by this Order. Outreach and education events should focus on meeting water quality objectives and protecting beneficial uses by identifying water quality problems, implementing pollution prevention strategies, and implementing management practices and assessment designed to protect water quality and beneficial uses and resolve water quality problems to achieve compliance with this Order. Records of participation in continuing education must be maintained in the Farm Plan and submitted to the Central Coast Water Board upon request.

6. Dischargers who exceed the fertilizer nitrogen application targets or limits, nitrogen discharge targets or limits, numeric interim quantifiable milestones, or surface receiving water limits must complete additional relevant water quality education sufficient to fully inform the implementation of additional or improved management practices and assessment to avoid future exceedances.

7. A copy of this Order and MRP must be kept at the ranch for reference by operating personnel. Key operating and site management personnel must be familiar with the content of both documents.

Management Practice Implementation and Assessment

8. Dischargers must implement management practices and assessment, as necessary, to improve and protect water quality, protect beneficial uses, achieve compliance with applicable water quality objectives, achieve the numeric targets, numeric interim quantifiable milestones, and numeric limits established in this Order. Management practices implementation and assessment must be documented in the appropriate section of the Farm Plan (e.g., irrigation and nutrient management practices and assessment must be documented in the INMP section of the Farm Plan). Dischargers must report on management practice implementation and assessment in the ACF, as described in the MRP.

CEQA Mitigation Measure Implementation, Monitoring, and Reporting

9. Impacts and mitigation measures identified in CEQA Mitigation Monitoring and Reporting Program are set forth in the Final Environmental Impact Report (FEIR) at Appendix D, which is incorporated by reference. Mitigation measures identified in the FEIR for this Order and required to be implemented as described in Appendix D, will substantially reduce environmental effects of the project. The mitigation measures included in this Order have eliminated or substantially lessened all significant effects on the environment, where feasible. Where noted, some of the mitigation measures are within the responsibility and jurisdiction of other public agencies. Such mitigation measures can and should be adopted, as applicable, by those other agencies.

10. Dischargers must report on mitigation measure implementation electronically in the Annual Compliance Form (ACF), as described in the MRP. Draft mitigation monitoring and reporting is available for review in the FEIR.

Part 2, Section C.1. Groundwater Protection

1. Dischargers may not be subject to all provisions of **Part 2, Section C.1** if they are members in good standing with the third-party alternative compliance pathway program included within **Part 2, Section C.2**.

Phasing

2. Ranches are assigned the Groundwater Phase Area of the groundwater basin where the ranch is located based on the relative level of water quality and beneficial use impairment and risk to water quality. All ranches are assigned a Groundwater Phase Area of 1, 2, or 3. Groundwater Phase 1 areas represent greater water quality impairment and higher risk to water quality relative to Groundwater Phase 2 and 3 areas.

3. The requirements and implementation schedules for groundwater protection are based on the groundwater phase areas, listed in **Table C.1-1** and shown on the maps in **Figure C.1-1**.

4. In the event that a ranch spans multiple Groundwater Phase areas, the ranch will be assigned the earlier phase. For example, a ranch that spans both Groundwater Phase 1 and Groundwater Phase 2 areas will be assigned to Groundwater Phase 1.

5. The Groundwater Phase Area assigned to each ranch will be displayed on the ranch eNOI in GeoTracker.

Irrigation and Nutrient Management Plan

6. Dischargers must develop and implement an Irrigation and Nutrient Management Plan (INMP) that addresses both groundwater and surface water. This section applies to the groundwater related INMP requirements and the surface water related INMP requirements are contained within **Part 2, Section C.3** of this Order. The INMP is a section of the Farm Plan and must be maintained in the Farm Plan and submitted to the Central Coast Water Board upon request. Summary information from the INMP must be submitted in the INMP Summary report. At a minimum, the elements of the INMP related to groundwater protection must include:

   a. Monitoring and recordkeeping necessary to submit complete and accurate reports, including the ACF, Total Nitrogen Applied (TNA) report, and INMP Summary report.
   b. Planning and management practice implementation and assessment that results in compliance with the fertilizer nitrogen application limits in **Table C.1-2** and the nitrogen discharge targets and limits in **Table C.1-3**.
   c. Descriptions of all irrigation, nutrient, and salinity management practices implemented and assessed on the ranch.
   d. When INMP certification is required, e.g., as a follow-up action or as a consequence for not meeting the quantifiable milestones and time schedules below, the INMP certification shall include the following:

      The person signing this Irrigation and Nitrogen Management Plan (INMP) certifies, under penalty of law, that the INMP was prepared under his/her direction and supervision, that the information and data reported is to the best of his/her knowledge and belief, true, accurate, and complete, and that he/she is aware that there are penalties for knowingly submitting false information. The qualified professional signing the INMP may rely on the information and data provided by the Discharger and is not required to independently verify the information and data.

The qualified professional signing the INMP below further certifies that he/she used sound irrigation and nitrogen management planning practices to develop irrigation and nitrogen application recommendations and that the recommendations are informed by applicable training to minimize nitrogen loss to surface water and groundwater. The qualified professional signing the INMP is not responsible for any damages, loss, or liability arising from subsequent implementation of the INMP by the Discharger in a manner that is inconsistent with the INMP's recommendations for nitrogen application. This certification does not create any liability or claims for environmental violations.

Qualified professional certification:
"I, ____________________, certify this INMP in accordance with the statement above."

___________________________ (Signature)

The discharger additionally agrees as follows:

"I, ____________________, Discharger, have provided information and data to the certifier above that is, to the best of my knowledge and belief, true, accurate, and complete, that I understand that the certifier may rely on the information and data provided by me and is not required to independently verify the information and data, and that I further understand that the certifier is not responsible for any damages, loss, or liability arising from subsequent implementation of the INMP by me in a manner that is inconsistent with the INMP's recommendations for nitrogen application. I further understand that the certification does not create any liability for claims for environmental violations."

Quantifiable Milestones and Time Schedules

7. As shown in **Table C.1-2**, the fertilizer nitrogen application limits go into effect during the second year of the this Order (December 31, 2023).

8. As shown in **Table C.1-3**, the nitrogen discharge targets go in to effect during the second year of this Order (December 31, 2023) and nitrogen discharge limits go in to effect during the fifth year of this Order (December 31, 2027).

Fertilizer Nitrogen Application Limits

9. Dischargers must not apply fertilizer nitrogen (**A_{FER}**) at rates greater than the limits in **Table C.1-2.** Compliance with fertilizer nitrogen application limits is assessed for each specific crop reported in the TNA report or INMP Summary report.

Nitrogen Discharge Targets and Limits

10. This Order requires Dischargers to submit information on nitrogen applied (**A**) and nitrogen removed (**R**). This Order also establishes nitrogen discharge targets and limits based on the calculation of nitrogen applied minus nitrogen removed (**A-R**) using the formulas below. Nitrogen must not be discharged at rates greater than the targets and limits in **Table C.1-3**. Compliance with nitrogen discharge targets and limits is assessed annually for the entire ranch in the INMP Summary report through one of the **three compliance pathways** shown below. Compliance with all pathways is not required.

    Compliance Pathway 1:

    $$A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) + A_{IRR} - R = \text{Nitrogen Discharge}$$

    OR

    Compliance Pathway 2:

    $$A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) = R$$

    OR

    Compliance Pathway 3:

    $$A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) - R = \text{Nitrogen Discharge}$$

    In all formulas, $R = R_{HARV} + R_{SEQ} + R_{SCAVENGE} + R_{TREAT} + R_{OTHER}$

    a. **A_{FER}** is the amount of fertilizer nitrogen applied in pounds per acre.
    b. **C** is the compost discount factor used to represent the amount of compost nitrogen mineralized during the year that the compost was applied.
    c. **A_{COMP}** is the total amount of compost nitrogen applied in pounds per acre.
    d. **O** is the organic fertilizer discount factor used to represent the amount of nitrogen mineralized during the first 12 weeks in the year it was applied.
    e. **A_{ORG}** is the total amount of organic fertilizer or amendment nitrogen applied in pounds per acre.

f. $\mathbf{A_{IRR}}$ is the amount of nitrogen applied in the irrigation water estimated from the volume required for crop evapotranspiration (ET) in pounds per acre.
g. **R** is the amount of nitrogen removed from the field through harvest, sequestration, or other removal methods, in pounds per acre.
h. $\mathbf{R_{HARV}}$ is the amount of nitrogen removed from the field through harvest or other removal of crop material.
i. $\mathbf{R_{SEQ}}$ is the amount of nitrogen removed from the field through sequestration in woody materials of permanent or semi-permanent crops.
j. $\mathbf{R_{SCAVENGE}}$ is the amount of nitrogen removed from the field through nitrogen scavenging cover crops and/or nitrogen scavenging high carbon amendments during the wet/rainy season.
k. $\mathbf{R_{TREAT}}$ is the amount of nitrogen removed from the ranch through a quantifiable treatment method (e.g., bioreactor).
l. $\mathbf{R_{OTHER}}$ is the amount of nitrogen removed from the ranch through other methods not previously quantified.

11. The Central Coast Water Board encourages the use of irrigation water nitrogen as a method of reducing the amount of fertilizer nitrogen applied to crops. The use of irrigation water nitrogen is typically referred to as "pump and fertilize" and is incentivized through compliance pathway 2 and 3 in **Table C.1-3**. The amount of irrigation water nitrogen is not used in the compliance calculation in these compliance pathways. The amount of irrigation water nitrogen must be reported regardless of the compliance pathway.

12. The Central Coast Water Board encourages the use of compost to improve soil health, nutrient and carbon sequestration, and water holding capacity consistent with the state's Healthy Soils Initiative. All compost nitrogen ($\mathbf{A_{COMP}}$) applied to the ranch must be reported in the TNA report or INMP Summary report; however, the use of compost is incentivized through the option for Dischargers to use a compost "discount" factor (**C**). Dischargers may use the compost discount factor provided by the Central Coast Water Board in the MRP or may determine their own discount factor. The discounted compost nitrogen must, at a minimum, represent the amount of compost mineralized during the year the compost was applied to the ranch. If the Discharger uses their own compost discount factor, they must maintain records of the method used to determine the compost discount factor in the Farm Plan, and these records must be submitted to the Central Coast Water Board upon request.

13. The Central Coast Water Board encourages the use of organic fertilizers and amendments to improve soil health, nutrient and carbon sequestration, and water holding capacity consistent with the state's Healthy Soils Initiative. All organic fertilizer and amendment nitrogen ($\mathbf{A_{ORG}}$) applied to the ranch must be reported in the TNA report or INMP Summary report; however, the use of organic fertilizers and amendments is incentivized through the option for Dischargers to

use an organic fertilizer “discount” factor (**O**). Dischargers may use the organic fertilizer discount factor associated with the products C:N ratio, provided by the Central Coast Water Board in the MRP. The discounted organic fertilizer nitrogen must, at a minimum, represent the amount of organic fertilizer mineralized during the first 12 weeks the organic fertilizer was applied to the ranch. The Discharger must maintain records of the organic products used and their associated C:N ratios in the Farm Plan, and these records must be submitted to the Central Coast Water Board upon request. The following products are not eligible to receive an organic fertilizer discount: a) products with no organic compounds (long chain carbon) molecules, such as conventional fertilizer, slow release fertilizers, b) products that do not depend on microbial mineralization to release nitrogen to mineral form to make it available for crop uptake, c) products without C:N ratio information available, and d) organic liquid fertilizers that are in the liquid and/or emulsified form.

14. The amount of **crop material** removed through harvest or other methods (**R_{HARV}**) must be calculated using the formula described below. Dischargers must either use the crop-specific conversion coefficient values found in the MRP or develop their own conversion coefficient values following the approved method in the MRP. If Dischargers develop their own conversion coefficient, they must maintain information on the method used in the Farm Plan, and these records must be submitted to the Central Coast Water Board upon request.

    R_{HARV} = Conversion Coefficient x Material Removed

    a. The **Conversion Coefficient** is a crop-specific coefficient used to convert from units of material removed per acre to units of nitrogen removed per acre.
    b. **Material Removed** is the amount of nitrogen-containing material removed from the field, in units of pounds per acre.

15. The amount of nitrogen removed through **sequestration** in woody material of permanent or semi-permanent crops (**R_{SEQ}**) must be estimated by the Discharger. Dischargers must maintain records detailing how they estimated the amount of nitrogen sequestered in their permanent crops. These records must be maintained in the Farm Plan and submitted to the Central Coast Water Board upon request.

16. The Central Coast Water Board encourages Dischargers to implement best management practices that reduce nitrogen leaching in the wet/rainy season. Dischargers may claim a nitrogen scavenging credit (**$R_{SCAVENGE}$**) provided by the Central Coast Water Board in the MRP, one time per year for each ranch acre where nitrogen scavenging cover crops or nitrogen scavenging high carbon amendments are utilized during the wet/rainy season. The total acres receiving

the nitrogen scavenging credit may not exceed the ranch acres. Dischargers electing to claim the nitrogen scavenging credit must ensure that their cover crop and/or high carbon amendment best management practice meets the definitions of a nitrogen scavenging cover crop and/or nitrogen scavenging high carbon amendment, as noted in the MRP and Definitions. Substantiating records for this credit must be maintained in the Farm Plan and submitted to the Central Coast Water Board upon request.

17. The Central Coast Water Board encourages Dischargers to develop and implement innovative methods for removing nitrogen from the environment to improve water quality. Dischargers may use treatment methods (e.g., bioreactors) to remove nitrogen from groundwater or surface water and may count this towards their nitrogen removal (**R**) value if they are able to quantify the amount of nitrogen removed from ranch discharge to groundwater or surface water. This quantified removal through treatment or other innovative methods must be reported as $\mathbf{R_{TREAT}}$. Dischargers electing to account for this nitrogen removal must monitor the volume and concentration of water entering and exiting their treatment system and calculate the amount of nitrogen removed. These records must be maintained in the Farm Plan and submitted to the Central Coast Water Board upon request.

18. If Dischargers remove additional nitrogen through means other than removing crop material ($\mathbf{R_{HARV}}$), sequestration ($\mathbf{R_{SEQ}}$), scavenging credit ($\mathbf{R_{SCAVENGE}}$), or treatment methods ($\mathbf{R_{TREAT}}$), they must quantify and report this additional removal as $\mathbf{R_{OTHER}}$. Dischargers must maintain records detailing how they calculated $\mathbf{R_{OTHER}}$. These records must be maintained in the Farm Plan and submitted to the Central Coast Water Board upon request.

19. The discharge of nitrogen in excess of the nitrogen discharge **targets** in **Table C.1-3** may result in additional requirements, including obtaining additional education, INMP certification by a qualified professional, implementing additional or improved management practices, and increased monitoring and/or reporting.

20. The discharge of nitrogen in excess of the nitrogen discharge **limits** in **Table C.1-3** may result in additional requirements, including obtaining additional education, INMP certification by a qualified professional, implementing additional or improved management practices, increased monitoring and reporting, and/or progressive enforcement actions.

21. Dischargers who apply more fertilizer nitrogen ($\mathbf{A_{FER}}$) than the fertilizer nitrogen application limits in **Table C.1-2** to any specific crop **and** who are able to demonstrate compliance with the **final** nitrogen discharge limits, as shown in **Table C.1-3**, are exempt from the fertilizer nitrogen application limit.

22. Dischargers who can quantifiably demonstrate that their ranches pose no threat to surface water quality or groundwater quality may submit a technical report to the Executive Officer for review. If approved, the Discharger is not required to conduct the nitrogen application (**A**) or removal (**R**) monitoring and reporting or to submit the INMP Summary report, regardless of what Groundwater Phase area the ranch is in. The technical report must demonstrate that nitrogen applied at the ranch does not percolate below the root zone in an amount that could degrade groundwater and does not migrate to surface water through discharges, including drainage, runoff, or sediment erosion. Dischargers must provide the Executive Officer with annual updates to confirm that the exemption is still applicable. Failure to provide sufficient annual updates confirming that the exemption is still applicable will result in an immediate reinstatement of the requirement to submit the INMP Summary report for applicable Dischargers. Dischargers electing to use this approach are still eligible to participate in the third-party alternative compliance pathway for groundwater protection.

23. Dischargers who can quantifiably demonstrate that their ranch is achieving the **final** nitrogen discharge limits , as shown in **Table C.1-3,** are not required to submit the nitrogen removal (**R**) reporting in the INMP Summary report, regardless of what Groundwater Phase area the ranch is in. Example situations where this may apply include participation in an approved third-party program that certifies that the Discharger is meeting the final discharge limit and will continue to do so for the duration of the Discharger's participation in the approved third-party program, or by submitting a technical report, subject to Executive Officer review, that quantifies the amount of nitrogen discharge based on the volume and nitrogen concentration of all discharges from the ranch. In these situations, confirmation of membership in the approved third-party program or Executive Officer approval of a submitted technical report constitute compliance with the nitrogen removed (**R**) reporting requirement in the INMP Summary report. This exemption only applies to removal (**R**) in the INMP Summary report; all other requirements, including the TNA report, still apply as described in this Order. Dischargers must provide the Executive Officer with annual updates to confirm that the exemption is still applicable. Failure to provide sufficient annual updates confirming that the exemption is still applicable will result in an immediate reinstatement of the requirement to submit the nitrogen removal (R) reporting information in the INMP Summary report for applicable Dischargers. Dischargers electing to use this approach are still eligible to participate in the third-party alternative compliance pathway for groundwater protection.

24. Dischargers, groups of dischargers or commodity groups who can quantify the amount of nitrogen discharged from their ranch or for specific crops or via specific management practices by directly monitoring it at the points of discharge can propose an alternative monitoring methodology to comply with the nitrogen

discharge targets and limits, in lieu of using the A-R compliance formulas. Example situations where this may apply includes greenhouse, nursery, container production or intensive crop production where irrigation and drain water is captured and allows for direct monitoring of discharges. For these types of situations, it may be easier to monitor nitrogen discharge than to calculate the amount of nitrogen removed at harvest for each one of the many different crops and plants being grown. Dischargers must submit a request to the Executive Officer with a technical report of the methodology proposed to quantify nitrogen discharges. The methodology must include enough information to quantify the amount of nitrogen discharged and confirm compliance with the nitrogen discharge targets and limits, as shown in **Table C.1-3 or Table C.2-2** (for Dischargers participating in the Third-Party Alternative Compliance Pathway Program for Groundwater Protection described in **Part 2, Section C.2)**. Acceptable methodologies must include direct measurements of the volume and nitrogen concentration of the water discharged from each ranch per acre and year. Executive Officer approval of the method(s) must be granted before the discharger begins reporting nitrogen discharge based on the proposed methodology. Dischargers who obtain Executive Officer approval to directly monitor their nitrogen discharge from their ranches will not be required to submit nitrogen removal (R) reporting in the INMP Summary report. Dischargers electing to use this approach are still eligible to participate in the third-party alternative compliance pathway program for groundwater protection.

25. The initial 2027 nitrogen discharge limits, as shown in **Table C.1-3** will be re-evaluated based on Discharger reported nitrogen applied and removed data, new science, and management practice implementation and assessment before becoming effective.

Monitoring and Reporting

26. Dischargers must report on management practice implementation and assessment electronically in the **ACF**, as described in the MRP.

27. Dischargers must record and report total nitrogen applied to all crops grown on the ranch, electronically in the TNA report form, as described in the MRP.

28. Dischargers must track and record the following elements of the INMP Summary report that are not included in the TNA report: total nitrogen removed from the ranch and information on irrigation water application and discharge volumes. Dischargers must submit this information electronically in the INMP Summary report form as described in the MRP.

29. The INMP Summary report contains the same nitrogen application information as the TNA report, plus additional information related to nitrogen removed and irrigation management. **Therefore, the INMP Summary report satisfies the**

TNA report requirement and an additional TNA report is not required to be submitted when the INMP Summary report is submitted to the Central Coast Water Board.

30. Dischargers must conduct **irrigation well monitoring and reporting prior to the start of groundwater quality trend monitoring and reporting**, either individually or as part of a third-party effort, as described in the MRP.

31. Dischargers must conduct **on-farm domestic well monitoring and reporting**, either individually or as part of a third-party effort, as described in the MRP.

32. Dischargers must conduct **groundwater quality trend monitoring and reporting**, either individually or as part of a third-party effort, as described in the MRP. This requirement applies to all Dischargers enrolled in this Order, regardless of how many wells are currently present on their ranch.

    a. Dischargers who elect to perform groundwater quality trend monitoring and reporting as part of a **third-party** effort must form or join a third-party. The third-party must submit a work plan for Executive Officer review by the dates and covering the areas specified in the MRP unless it is associated with the Third-Party Alternative Compliance Pathway for Groundwater Protection described in **Part 2, Section C.2**. The work plan must be approved by the Executive Officer prior to implementation. Once approved by the Executive Officer, the work plan must be implemented.
    b. Dischargers who elect to perform groundwater quality trend monitoring and reporting individually must submit a work plan for Executive Officer review, by the date specified in the MRP, based on their ranch location. The work plan must be approved by the Executive Office prior to implementation. The work plan must describe how the ranch-level groundwater quality trend monitoring program will evaluate groundwater quality trends over time and assess the impacts of agricultural discharges on groundwater quality. Once approved by the Executive Officer, the work plan must be implemented. Dischargers without a well on their property may comply with individual ranch-level groundwater quality trend monitoring and reporting requirements by implementing one of the options specified in the MRP.

33. When required by the Executive Officer based on groundwater quality data or significant and repeated exceedance of the nitrogen discharge targets or limits, Dischargers must complete **ranch-level groundwater discharge monitoring and reporting**, either individually or as part of a third-party effort as described in the MRP. Water Board staff will coordinate with Dischargers prior to the Executive Officer invoking this requirement to determine if non-compliance is the result of unforeseen or uncontrollable circumstances and to provide the Discharger with 90-day advanced notice of the forthcoming requirement. When ranch-level groundwater discharge monitoring and reporting is required, a work

plan, including a SAP and QAPP, must be submitted for Executive Officer review prior to implementation. Once approved by the Executive Officer, the work plan must be implemented. Ranch-level groundwater discharge monitoring may be discontinued with the approval of the Executive Officer when the Discharger comes into compliance with the nitrogen discharge targets or limits, or the discharge has otherwise ceased.

Part 2, Section C.2. Third-Party Alternative Compliance Pathway for Groundwater Protection

1. Dischargers that are members in good standing in the third-party alternative compliance pathway program are subject to the provisions of this **Part 2, Section C.2**, unless otherwise stated. For purposes of this section, such Dischargers are referred to as "participating Dischargers."

   Participating dischargers:

   a. Are not subject to fertilizer nitrogen application limits in **Table C.1-2**, which are enforceable by the Central Coast Water Board.
   b. Are not subject to nitrogen discharge limits in **Table C.1-3**, which are enforceable by the Central Coast Water Board.
   c. Are subject to targets, which if exceeded result in consequences outlined in this **Part 2, Section C.2**.
   d. Are not subject to ranch-level groundwater discharge monitoring and reporting.
   e. Are generally provided more time to achieve fertilizer nitrogen application targets and nitrogen discharge targets, relative to non-participating dischargers.

2. Prior to the initiation of the work plan process outlined below and in the MRP for this third-party alternative compliance pathway program, entities wishing to implement the third-party alternative compliance pathway program described in this **Part 2, Section C.2** must submit a third-party alternative compliance pathway program proposal consistent with the third-party program requirements outlined in **Part 2, Section A** of this Order, as well as the request for proposal process and associated third-party program expectations document forthcoming after Order adoption. For purposes of this section, the entity approved to implement the third-party alternative compliance pathway is referred to as the approved third-party alternative compliance pathway program administrator.

3. Participating Dischargers must develop and implement an Irrigation and Nutrient Management Plan (INMP) that addresses groundwater. The INMP is a section of the Farm Plan and must be maintained in the Farm Plan and submitted to the Central Coast Water Board upon request. Summary information from the INMP must be submitted in the INMP Summary report. At a minimum, the elements of

the INMP related to groundwater and surface water protection for participating Dischargers in a third-party program must include:

a. Monitoring and recordkeeping necessary to submit complete and accurate reports, including the Annual Compliance form (ACF), Total Nitrogen Applied (TNA) report, and INMP Summary report.
b. Planning and management practice implementation and assessment that results in compliance with the fertilizer nitrogen application targets in **Table C.2-1,** the nitrogen discharge targets in **Table C.2-2**, and groundwater protection area targets to be determined and approved by the Executive Officer.
c. Descriptions of all irrigation, nutrient, and salinity management practices implemented and assessed on the ranch.

Quantifiable Milestones and Time Schedules

4. As shown in **Table C.2-1**, the fertilizer nitrogen application targets go in to effect during the third year of the this Order (December 31, 2024) for participating Dischargers in the third-party alternative compliance pathway.

5. As shown in **Table C.2-2**, the nitrogen discharge targets go in to effect during the third year of this Order (December 31, 2024) for participating Dischargers in the third-party alternative compliance pathway.

Fertilizer Nitrogen Application Targets

6. Participating Dischargers must not apply fertilizer nitrogen ($\mathbf{A_{FER}}$) at rates greater than the **targets** in **Table C.2-1.** Compliance with fertilizer nitrogen application targets is assessed annually for each specific crop reported in the TNA report or INMP Summary report.

7. Participating Dischargers that apply fertilizer nitrogen ($\mathbf{A_{FER}}$) at rates greater than the **targets** in **Table C.2-1** one year after the compliance date are subject to follow-up by the approved third-party program administrator, which could include additional education and/or implementation of additional or improved management practices.

8. Participating Dischargers that apply fertilizer nitrogen ($\mathbf{A_{FER}}$) at rates greater than the **targets** in **Table C.2-1** for a two-year running average after the compliance date, are no longer eligible to participate in the third-party alternative compliance pathway program and must comply with the individual groundwater protection requirements in **Part 2, Section C.1**. Water Board staff will coordinate with participating Dischargers prior to the Executive Officer invoking this requirement to determine if non-compliance is the result of unforeseen or uncontrollable

circumstances and to provide the Discharger with 90-day advanced notice of the forthcoming individual groundwater protection requirements.

Nitrogen Discharge Targets

9. Participating Dischargers must not discharge nitrogen at rates greater than the **targets** in **Table C.2-2**. Compliance with nitrogen discharge targets is assessed annually for the entire ranch using INMP Summary report information. Participating Dischargers must comply with at least one of the nitrogen discharge compliance pathways described in **Part 2, Section C.1** by the compliance date.

10. The final year 2028 nitrogen discharge **targets**, as shown in **Table C.2-2** will be re-evaluated based on discharger reported nitrogen applied and removed data, new science, management practice effectiveness assessment and evaluation, and groundwater protection area collective numeric interim and final targets before becoming effective.

11. Participating Dischargers that discharge nitrogen in excess of the nitrogen discharge **targets** in **Table C.2-2** one year after the compliance date are subject to follow-up by the approved third-party alternative compliance pathway program administrator, which could include additional education and/or implementation of additional or improved management practices.

12. Participating Dischargers that discharge nitrogen in excess of the nitrogen discharge **targets** in **Table C.2-2** for a two-year running average, must obtain annual INMP certification by a qualified professional until nitrogen discharge targets are achieved for a two-year running average. The INMP certification must include the certification language outlined in **Part 2, Section C.1**.

13. Participating Dischargers that discharge nitrogen in excess of the final nitrogen discharge target in **Table C.2-2** for a three-year running average after the compliance date, are no longer eligible to participate in the third-party alternative compliance pathway program and must comply with individual groundwater protection requirements in **Part 2, Section C.1**. Water Board staff will coordinate with participating Dischargers prior to the Executive Officer invoking this requirement to determine if non-compliance is the result of unforeseen or uncontrollable circumstances and to provide the Discharger with 90-day advanced notice of the forthcoming individual groundwater protection requirements.

Groundwater Protection Areas, Formulas, Values, and Targets

14. The approved third-party alternative compliance pathway program administrator, on behalf of its participating Dischargers, must develop and submit incremental 35%, 70%, and 100% work plans for Executive Officer approval, as described in

the MRP. The 35% and 70% work plans will be subject to Executive Officer approval following a 30-day written public period and a public meeting to receive public comments and board input.

15. The incremental draft and final work plans must include the following:

    a. Clearly defined objectives and scientific justification for all proposed groundwater protection (GWP) areas, formulas, values, and collective numeric interim and final targets.

    b. Scientific justification in support of the proposed GWP areas with respect to, but not limited to, geology, hydrogeology, groundwater basin and subbasin areas, recharge areas, land uses, cropping patterns, and potential membership coverage by acreage and number of members. The proposed GWP areas, formula, values, and collective interim and final targets must be tied together and scaled in a way that will allow for the effective evaluation of water quality and beneficial use protection and compliance with GWP interim and final targets on both a collective and individual basis.

    c. A program to assess and evaluate the performance and effectiveness of the third-party alternative compliance pathway program's collective numeric interim and final targets in achieving tangible groundwater quality improvements over time at the individual GWP area scale. The assessment and evaluation program must be scaled – spatially and temporally – in coordination with the regional groundwater quality trend monitoring program described in **Part 2, Section C.1** of the third-party program over time.

    d. Criteria and associated follow-up actions or consequences that the third-party alternative compliance pathway program administrator will implement if participating Dischargers do not meet collective numeric interim and final targets, and third-party program membership eligibility requirements including membership probation and revocation to address recalcitrant participating Dischargers.

16. The final work plans must be approved by the Executive Officer prior to implementation. Once approved by the Executive Officer, the work plans must be implemented.

17. Compliance with the collective numeric interim and final targets for a GWP area shall be determined by aggregating data from participating Dischargers within a GWP area to determine if the combined nitrogen discharge is achieving collective compliance with the GWP Area numeric interim and final targets.

18. Although compliance with GWP collective numeric interim and final targets is assessed using the combined nitrogen discharge of participating Dischargers in a GWP area, GWP collective numeric interim and final targets must be designed such that there is a clear and quantifiable means of assessing individual ranch level contribution to the success or failure of complying with the GWP area collective numeric interim and final targets.

19. Participating Dischargers in a GWP area that exceed the GWP collective numeric interim and final targets by 20% or more, as evaluated individually and on an annual basis, are subject to follow-up by the approved third-party alternative compliance pathway program administrator, which could include additional education or implementation of additional or improved management practices.

20. All participating Dischargers in a GWP area that exceeds the collective numeric interim and final GWP targets by 20% or more for a 3-year running average after the compliance date, are no longer eligible to participate in the third-party alternative compliance pathway program and must comply with the individual groundwater protection requirements in **Part 2, Section C.1**.

Monitoring and Reporting

21. Participating Dischargers must submit ACF, TNA, and INMP Summary information according to requirements outlined in **Part 2, Section C.1**, and as described in the MRP.

22. Participating Dischargers must submit ACF, TNA, and INMP Summary information accordingto the groundwater phase assigned to each ranch. Groundwater phases are outlined in **Part 2, Section C.1**.

23. Participating Dischargers must submit groundwater monitoring and reporting information according to requirements outlined in **Part 2, Section C.1** and as described in the MRP, either individually or as part of a third-party program.

Part 2, Section C.3. Surface Water Protection

Priority Areas (Individual)

1. Ranches are assigned the Surface Water Priority area of the HUC-8 watershed where the ranch is located based on the relative level of water quality, beneficial use impairment and risk to water quality. All ranches are assigned a Surface Water Priority of 1, 2, 3, or 4. Surface Water Priority Area 1 areas represent greater water quality impairment and higher risk to water quality relative to Surface Water Priority Areas 2, 3, and 4.

2. The follow-up surface receiving water implementation requirements for surface water protection are based on the surface water priority areas, listed in **Table C.3-1** and shown on the map in **Figure C.3-1**.

3. In the event that a ranch spans multiple Surface Water Priority areas, the ranch will either be assigned the earlier priority or will be assigned the priority of the watershed or drainage unit that the ranch drains or discharges to, if specific discharge information is provided to the Central Coast Water Board.

4. The Surface Water Priority assigned to each ranch will be displayed in the ranch eNOI in GeoTracker.

Priority Areas (Third-Party Program)

5. Ranches that are enrolled as part of an approved third-party follow-up surface receiving water implementation program are assigned the third-party program Surface Water Priority of high priority, medium priority, or low priority where the ranch is located, as shown in **Table C.3-1.3P** and the map shown in **Figure C-3.1. 3P**.

6. In the event that a ranch spans multiple third-party program Surface Water Priority areas, the ranch will either be assigned the earlier priority or will be assigned the priority of the watershed or drainage unit that the ranch drains or discharges to, if specific discharge information is provided to the Central Coast Water Board.

7. The third-party program Surface Water Priority assigned to each ranch will be displayed in the ranch eNOI in GeoTracker.

Irrigation and Nutrient Management

8. Dischargers must develop and implement an Irrigation and Nutrient Management Plan (INMP) that addresses both groundwater and surface water. This section applies to the surface water related INMP requirements and the groundwater related INMP requirements are contained within **Part 2, Section C.1** of this Order. The INMP is a section of the Farm Plan, must be maintained in the Farm Plan (see **Part 2, Section B** and Farm Plan paragraph 14 below), and submitted to the Central Coast Water Board upon request. Summary information from the INMP must be submitted in the ACF, as described in the MRP.

Pesticide Management

9. Dischargers must develop and implement a Pesticide Management Plan (PMP). The PMP is a section of the Farm Plan, must be maintained in the Farm Plan (see **Part 2, Section B** and Farm Plan paragraph 14 below), and submitted to

the Central Coast Water Board upon request. Summary information from the PMP must be submitted in the ACF, as described in the MRP.

Sediment and Erosion Management

10. Dischargers must develop and implement a Sediment and Erosion Management Plan (SEMP). The SEMP is a section of the Farm Plan, must be maintained in the Farm Plan (see **Part 2, Section B** and Farm Plan paragraph 14 below), and submitted to the Central Coast Water Board upon request. Summary information from the SEMP must be submitted in the ACF, as described in the MRP.

Impermeable Surfaces

11. Ranches with either 50 to 100 percent of fields covered by impermeable surfaces (defined in Attachment C of this Order), or with greater than or equal to 22,500 square feet (0.5 acre) of impermeable surfaces must manage stormwater discharge duration, rate, and volume as described below.

    a. Stormwater discharge intensity from fields with impermeable surfaces must not exceed the stormwater discharge intensity from equivalent permeable field area for any storm event up to and including the 10-year storm event. The *Santa Barbara Urban Hydrograph Method* [4] and the *Rational Method* [5] are two methods for determining the stormwater discharge intensity match, however other similar methods to determine stormwater discharge intensity may be used.

    b. Stormwater discharge volume from fields with impermeable surfaces must not exceed the stormwater discharge volume from equivalent permeable field area for any storm event up to and including the 95th percentile, 24-hour storm event. The *Curve Number Method* [6] is a method for determining the stormwater discharge volume match, however other similar methods to determined stormwater discharge volume may be used.

    c. Description and time schedules of management practices, treatment, and/or control measures implemented to meet design storm requirements and mitigate for increased stormwater runoff from impermeable surfaces must be kept in the Farm Plan. Methods for assessing the effectiveness of each management practice, treatment, and/or control measure include calculation of peak and runoff volumes, visual inspection, photo documentation, and local precipitation event data, however other storm event measurement

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[4] The Santa Barbara Urban Hydrograph Method is based on the curve number approach and is useful for sheet flow over a plane surface, called overland flow.
[5] The Rational Method is used to determine peak discharge from runoff in a given area.
[6] The Curve Number Method was developed by the Soil Conservation Service to estimate runoff from rainfall on agricultural fields and provides runoff depth that can be used to calculate runoff volume.

types and recordkeeping that determine the effectiveness of management practices may be used.

Farm Plan

12. At a minimum, the elements of the Farm Plan related to surface water protection must include:

    a. Monitoring and recordkeeping necessary to submit complete and accurate reports, including the ACF.

    b. Planning and management practice implementation and assessment that results in compliance with the surface water limits in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity that apply to a ranch based on the ranch location.

    c. Descriptions of all management practices implemented on the ranch, as follows:

        i. All irrigation, nutrient, and salinity management practices (i.e., INMP).
        ii. All pesticide management practices (i.e., PMP), including pesticide application characteristics (e.g., timing, formulations, wind, and rainfall monitoring, etc.) and any integrated pest management (IPM) practices implemented (e.g., scouting, beneficial insects, etc.).
        iii. All sediment, erosion, irrigation, stormwater, road, agricultural drainage pump, and impermeable surface management practices (i.e., SEMP).

Quantifiable Milestones and Time Schedules

13. Dischargers in an area **with an established TMDL** (**Figure C.3-2** for Nutrient TMDL areas, **Figure C.3-3** for Pesticide and Toxicity TMDL areas, and **Figure C.3-4** for Sediment TMDL areas) for a pollutant must not cause or contribute to an exceedance of the pollutant's surface receiving water limit in **Table C.3-2** for nutrients, **Table C.3-4** for pesticides and toxicity, and **Table C.3-6** for sediment in accordance with the compliance dates specified in the applicable table.

14. Dischargers in an area **without an established TMDL** for a pollutant must not cause or contribute to an exceedance of the pollutant's surface receiving water limit in **Table C.3-3** for nutrients, **Table C-3.5** for pesticides and toxicity, and **Table C.3-7** for turbidity in accordance with the compliance dates specified in the applicable table.

15. The surface receiving water limits in **Table C.3-3** for nutrients, **Table C-3.5** for pesticides and toxicity, and **Table C.3-7** for turbidity, apply to all Dischargers unless a specific surface receiving water limit based on a TMDL in **Table C.3-2** for nutrients, **Table C.3-4** for pesticides and toxicity, and **Table C.3-6** for sediment applies to a Discharger.

16. Dischargers in areas where the water quality for a pollutant is better (i.e., of higher quality) than the applicable limit in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity must not cause or contribute to an increase of that pollutant in receiving waters, except as consistent with the antidegradation findings of this Order.

17. The discharge of pollutants from a ranch that cause or contribute to an exceedance of the applicable limits after the compliance date in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity may result in additional requirements, including obtaining additional education, implementing additional or improved management practices, follow-up monitoring and reporting, ranch-level surface discharge monitoring and reporting, and progressive enforcement actions.

Monitoring and Reporting

18. Dischargers must complete **surface receiving water monitoring and reporting** as described in the MRP, either individually or through a third-party monitoring program approved by the Executive Officer. Dischargers, either individually or through a third-party monitoring program, must submit a work plan, including a SAP and QAPP as described the MRP, for Executive Officer review prior to implementation. Once approved by the Executive Officer, the work plan must be implemented. The work plan must include applicable monitoring for the pollutants in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity and must describe the actions that will be taken to achieve the limits in the tables.

19. Dischargers must develop a **follow-up surface receiving water implementation work plan**, either individually or through a third-party program. The work plans per the MRP requirements are subject to Executive Officer approval following a 30-day period to receive written public comments. The work plan due date is based on the Surface Water Priority of the ranch.

a. Individual Dischargers that are not part of a third-party program approved to develop and implement follow-up surface receiving water implementation work plan(s) must submit an individual work plan by the dates specified below, based on the ranch's Surface Water Priority Area defined in **Table C.3-1** of the Order:
   i. March 1, 2023 for Surface Water Priority 1 areas
   ii. March 1, 2024 for Surface Water Priority 2 areas
   iii. March 1, 2025 for Surface Water Priority 3 areas
   iv. March 1, 2026 for Surface Water Priority 4 areas

b. Third-party program(s) approved to develop and implement follow-up surface receiving water implementation work plan(s) on behalf of participating Dischargers must submit work plan(s) by the dates specified below, based on the third-party program surface water priority area. Third-party program surface water priority areas are defined in **Table C.3-1.3P** of the Order:
   i. March 1, 2024 for High Priority areas
   ii. March 1, 2026 for Medium Priority areas
   iii. March 1, 2028 for Low Priority and All Other areas

c. The work plan must include numeric interim quantifiable milestones and follow-up actions, such as outreach, education, and management practice implementation and assessment, and, where applicable for pollutant source identification and abatement, additional surface receiving water monitoring locations. The work plan must include a SAP and QAPP. The work plan must describe the implementation measures that will be taken to reduce the discharge of relevant pollutants and achieve the applicable surface water numeric limits by the compliance dates in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity. The work plan must be submitted for Executive Officer review prior to implementation. Once approved, the work plan must be implemented.

d. Prior to the applicable compliance dates in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity, Dischargers who elect to participate in a third-party program to develop and implement their work plan will not be subject to ranch-level surface discharge monitoring and reporting.

e. Work plans must take into consideration the level of water quality impairment identified through surface receiving water monitoring. Work plans for areas with persistent exceedances of the surface water limits in **Table C.3-2**

(TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity must identify follow-up actions to restore degraded areas and meet surface receiving water limits (e.g., numeric interim quantifiable milestones, outreach, education, management practice implementation and assessment) and additional surface receiving water monitoring locations for pollutant source identification and abatement. Work plans for areas that are already achieving the surface water limits in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity must identify actions to be taken to protect the high-quality areas (e.g., numeric interim quantifiable milestones, outreach and education).

f. Dischargers who elect to develop their work plan individually and whose ranches are located in areas where surface receiving water monitoring shows an exceedance of an applicable surface water limit in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity after the applicable compliance deadline may be subject to ranch-level surface discharge monitoring and reporting.

20. When required by the Executive Officer, based on surface receiving water quality data or significant and repeated exceedance of the surface water quality limits in **Table C.3-2** (TMDL areas) and **Table C.3-3** (non-TMDL areas) for nutrients, **Table C.3-4** (TMDL areas) and **Table C-3.5** (non-TMDL areas) for pesticides and toxicity, and **Table C.3-6** (TMDL areas) for sediment and **Table C.3-7** (non-TMDL areas) for turbidity, Dischargers must complete **ranch-level surface discharge monitoring and reporting** as described in the MRP. Dischargers can complete this requirement either individually or as part of a third-party program effort. Water Board staff will coordinate with Dischargers prior to the Executive Officer invoking this requirement to determine if non-compliance is the result of unforeseen or uncontrollable circumstances and to provide the Discharger with 90-day advanced notice of the forthcoming requirement. When ranch-level surface discharge monitoring and reporting is required, a work plan, including a SAP and QAPP, must be submitted for Executive Officer review prior to implementation. Once approved by the Executive Officer, the work plan must be implemented. Ranch-level surface discharge monitoring may be discontinued with the approval of the Executive Officer when the Discharger comes into compliance with the surface receiving water limits, or the discharge has otherwise ceased.

21. Dischargers must report on nutrient, pesticide, and sediment and erosion control management practice implementation and assessment electronically in the ACF, as described in the MRP.

22. Dischargers whose ranches have impermeable surfaces must report on stormwater management practice implementation and assessment electronically in the ACF, as described in the MRP.

23. Dischargers with waterbodies within or bordering their ranch must measure and report the current riparian area (average width and length, in feet) in the ACF, as described in the MRP.

Part 2, Section D. Additional Requirements and Prohibitions

Waste Discharge Control and Prohibitions

1. Except in compliance with this Order, Dischargers must not cause or contribute to exceedances of applicable water quality objectives, as defined in Attachment A, must protect all beneficial uses for inland surface waters, enclosed bays, and estuaries, and for groundwater, as outlined in sections 3.3.2 and 3.3.4 of the Basin Plan, and must prevent nuisance as defined in Water Code section 13050.

2. Dischargers must achieve applicable Total Maximum Daily Load (TMDL) Load Allocations (LAs) by achieving the surface water receiving limits established in this Order. Dischargers must incorporate planning elements from applicable TMDLs into the appropriate section of their Farm Plan and, as appropriate, into their follow-up surface receiving water implementation work plan(s).

3. Dischargers that anticipate exceeding a limit or condition of the Order after the final compliance date has passed may request a time schedule order pursuant to Water Code section 13300 for the Central Coast Water Board's consideration. A time schedule order must be requested 18 months in advance of a Discharger or a group of Dischargers anticipating that they will not be able to achieve the receiving water limit by the compliance date. At a minimum, the request for a time schedule order must include information outlined in Attachment A (Additional Findings). Dischargers may either individually request a time schedule order or may jointly request a time schedule order with other Dischargers subject to the same groundwater or surface receiving water limit.

4. The discharge of rubbish, refuse, trash, irrigation tubing or tape, or other solid wastes into surface waters is prohibited. The placement of such materials where they discharge or have the potential to discharge to surface waters is prohibited.

5. The discharge of chemicals such as fertilizers, fumigants, pesticides, herbicides, or rodenticides down a groundwater well casing is prohibited.

6. The discharge of chemicals, including those used to control wildlife (such as bait traps or poison), directly into surface waters or groundwater is prohibited. The placement of chemicals in a location where they may be discharged to surface waters or groundwater is prohibited.

7. Dischargers who apply fertilizers, fumigants, pesticides, herbicides, rodenticides, or other chemicals through an irrigation system must have functional and properly maintained backflow prevention devices installed at the well or pump to prevent pollution of groundwater and surface water that comply with any applicable DPR requirements or local ordinances. Backflow prevention devices used to protect water quality must be those approved by the United States Environmental Protection Agency (USEPA), DPR, California Department of Public Health (CDPH), or the local public health or water agency.

8. Dischargers must properly destroy all abandoned groundwater wells, exploration holes or test holes, as defined by Department of Water Resources (DWR) Bulletin 74-81 and revised in 1988, in such a manner that they will not produce water or act as a conduit for mixing or otherwise transfer groundwater or waste pollutants between permeable zones or aquifers. Well destruction must be performed in compliance with any applicable DWR requirements or local ordinances (including local well destruction permitting requirements).

9. This Order does not authorize the discharge of pollutants from point sources to waters of the United States, including wetlands. Where required, Dischargers must obtain authorization for such discharges by obtaining a Clean Water Act (CWA) section 402 National Pollutant Discharge Elimination System (NPDES) permit or a CWA section 404 dredge and fill permit.

10. Dischargers who utilize containment structures (such as retention ponds or reservoirs) to achieve treatment or control of the discharge of waste must manage, construct, and maintain such containment structures to avoid discharges of waste to groundwater and surface water that cause or contribute to exceedances of water quality objectives or impairment of beneficial uses. Dischargers may choose the method of compliance appropriate for the individual ranch, which may include, but is not limited to:

    a. Implementing chemical treatment (such as enzymes);
    b. Implementing biological treatment (such as wood chips);
    c. Recycling or reusing contained water to minimize infiltration or discharge of waste;
    d. Minimizing the volume of water in the containment structure to minimize percolation of waste; and/or
    e. Minimizing percolation of waste via a synthetic, concrete, clay, or low permeability soil liner.

11. Dischargers must implement proper handling, storage, disposal, and management of fertilizers, fumigants, pesticides, herbicides, rodenticides, and other chemicals to prevent or control the discharge of waste to waters of the state that causes or contributes to exceedances of water quality standards. All chemical storage areas must have appropriate secondary containment structures to protect water quality and prevent discharge through spillage, mixing, or seepage.

12. Dischargers must implement water quality protective management practices (such as source control or treatment) to prevent erosion, reduce stormwater runoff quantity and velocity, and hold fine particles in place.

13. Dischargers must minimize the presence of bare soil vulnerable to erosion and soil runoff to surface waters and implement erosion control, sediment, and stormwater management practices in non-cropped areas, such as unpaved roads and other heavy use areas.

14. Dischargers who utilize agricultural drainage pumps must implement management practices to dissipate flow and prevent channel and/or streambank erosion resulting in increased sediment transport and turbidity within surface water.

15. Dischargers must comply with any applicable stormwater permits.

16. Dischargers must implement best practicable treatment and control (BPTC) measures for the construction and maintenance of farm roads to minimize erosion and sediment discharges that contribute to nonpoint source pollution.

17. Dischargers must ensure that all farm roads are, to the extent possible, hydrologically disconnected from waters of the state by installing disconnecting drainage features, increasing the frequency of (inside) ditch drain relief as needed, constructing out-sloped roads, constructing energy dissipating structures, avoiding concentrating flows in unstable areas, and performing inspection and maintenance as needed to optimize access road performance.

18. Dischargers must ensure that farm road surfacing, especially within a segment leading to waters of the state, minimizes sediment delivery to waters of the state and maximizes road integrity.

19. Dischargers must ensure that farm roads are out-sloped whenever possible to promote even drainage of the farm road surface, prevent the concentration of stormwater flow within an inboard or inside ditch, and to prevent disruption of the natural sheet flow pattern off a hill slope to waters of the state.

20. Farm road stormwater drainage structures must not discharge onto unstable slopes, earthen fills, or directly into waters of the state. Drainage structures must discharge onto stable areas with straw bales, slash, vegetation, and/or rock riprap.

21. If used, chemical toilets or holding tanks must be maintained in a manner appropriate for the frequency and conditions of usage, sited in stable locations, and located outside of areas bordering surface waterbodies.

22. Dischargers who produce and apply compost in-house must comply with the following requirements:

    a. Materials and activities on-site must not cause, threaten to cause, or contribute to conditions of pollution, contamination, or nuisance;
    b. Activities must be set back at least 100 feet from the nearest surface waterbody and/or the nearest water supply well;
    c. Dischargers must implement practices to minimize or eliminate the discharge of waste that may adversely impact the quality or beneficial uses of waters of the state;
    d. Dischargers must manage the application of water to compost (including from precipitation events) to reduce the generation of wastewater;
    e. Working surfaces must be designed to prevent, to the greatest extent possible, ponding, infiltration, inundation, and erosion, notwithstanding precipitation events, equipment movement, and other aspects of the facility operations;
    f. Dischargers must maintain the following records in the Farm Plan. These records must be submitted to the Central Coast Water Board upon request.
        i. Total operational footprint of compost activities (in acres), including ancillary activities;
        ii. Compost operation records to provide background information on the composting operation history and a description of methods and operation used, including the following: feedstock types, volumes, sources, and suppliers. Description of the method of composting (e.g., windrow, static, forced air, mechanical). Description of how residuals are removed from the feedstocks and managed and/or disposed of.
        iii. Description of water supply.
        iv. Map detailing the location and size (in acres) of the working surface used for the storage of incoming feedstocks, additives, and amendments (receiving area); active and curing composting; final product; drainage patterns; location of any groundwater monitoring wells and water supply wells within and/or near the property boundary; location and distance (in feet) to nearby water supply wells (e.g., municipal supply, domestic supply, agricultural wells) from the nearest property boundary of the operation; identification of all surface waterbodies, including streams, ditches, canals, and other drainage

courses; and distances from the nearest property boundary of the operation to these surface waterbody areas.

v. Records of appropriate monitoring (dependent on method of composting) for composting to develop final product (temperature, turning, air flow, etc.).

vi. Records of final product use, including locations and volumes.

23. Disturbance (e.g., removal, degradation, or destruction) of existing, naturally occurring, and established native riparian vegetative cover (e.g., trees, shrubs, and grasses), unless authorized (e.g., Clean Water Act [CWA] section 404 permit and CWA section 401 certification, WDRs, waivers of WDRs, a California Department of Fish and Wildlife [CDFW] Lake and Streambed Alteration Agreement, or municipal ordinance), is prohibited. Dischargers must avoid disturbance in riparian areas to minimize waste discharges and protect water quality and beneficial uses.

24. In the case where disturbance of riparian areas is authorized, Dischargers must implement appropriate and practicable measures to avoid, minimize, and mitigate erosion and discharges of waste.

Additional Requirements

25. Upon the Central Coast Water Board's request, Dischargers must submit information regarding compliance with any DPR adopted or approved surface water or groundwater protection requirements to the Central Coast Water Board.

26. Upon the Central Coast Water Board's request, Dischargers must submit proof of an approved Lake and Streambed Alteration Agreement or other authorization or release from the CDFW to the Central Coast Water Board for any work conducted within the bed, bank, and channel, including riparian areas, of parcels enrolled in this order, that has the potential to result in erosion and discharges of waste to waters of the State.

27. Upon the Central Coast Water Board's request, Dischargers must submit proof of a Clean Water Act section 404 dredge and fill permit from the United States Army Corps of Engineers (USACE) for any work that has the potential to discharge wastes considered "fill" material, such as sediment, to waters of the United States to the Central Coast Water Board.

28. Dischargers must comply with DWR Bulletin 74-81 and supplement 74-90, Water Code sections 13700 through 13755, and any local permitting requirements associated with installation of new wells.

29. This Order does not authorize any act that results in the taking of a threatened or endangered species or any act that is now prohibited, or becomes prohibited in

the future, under either the California Endangered Species Act (Fish and Game Code sections 2050 to 2097) or the federal Endangered Species Act (16 U.S.C. sections 1531 to 1544). If a "take" will result from any act authorized under this Order, the Dischargers must obtain authorization for an incidental take prior to taking action. Dischargers are responsible for meeting all applicable requirements of the California and federal Endangered Species Acts for the discharge authorized by this Order.

30. Dischargers or a representative authorized by the Discharger must sign technical reports submitted to the Central Coast Water Board to comply with this Order. Any person signing or submitting a document must provide the following certification, whether written or implied:

"In compliance with Water Code section 13267, I certify under penalty of perjury that this document and all attachments were prepared by me, or under my direction or supervision, following a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. To the best of my knowledge and belief, this document and all attachments are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

CERTIFICATION

I, Matthew T. Keeling, Executive Officer, do hereby certify that this General Order with all its attachments is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Central Coast Region on April XX, 2021.

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Matthew T. Keeling, Executive Officer

Tables and Figures

Tables and Figures related to Part 2, Section C.1. Groundwater Protection

Table C.1-1. Groundwater Phase Areas

Groundwater Basin[1]	Groundwater Phase
Gilroy-Hollister Valley - Llagas Area	Phase 1, Phase 2
Salinas Valley - Forebay Aquifer	Phase 1, Phase 2
Salinas Valley - Upper Valley Aquifer	Phase 1, Phase 2
Santa Maria River Valley - Santa Maria	Phase 1, Phase 2
Santa Ynez River Valley	Phase 1, Phase 3
Corralitos - Pajaro Valley	Phase 2
Gilroy Hollister Valley - North San Benito	Phase 2
Salinas Valley - 180/400 Foot Aquifer	Phase 2
Salinas Valley - East Side Aquifer	Phase 2
San Luis Obispo Valley	Phase 2
All Other Basins and Areas Outside of Basins	Phase 3

[1]As defined in the 2019 California Department of Water Resources Bulletin 118.

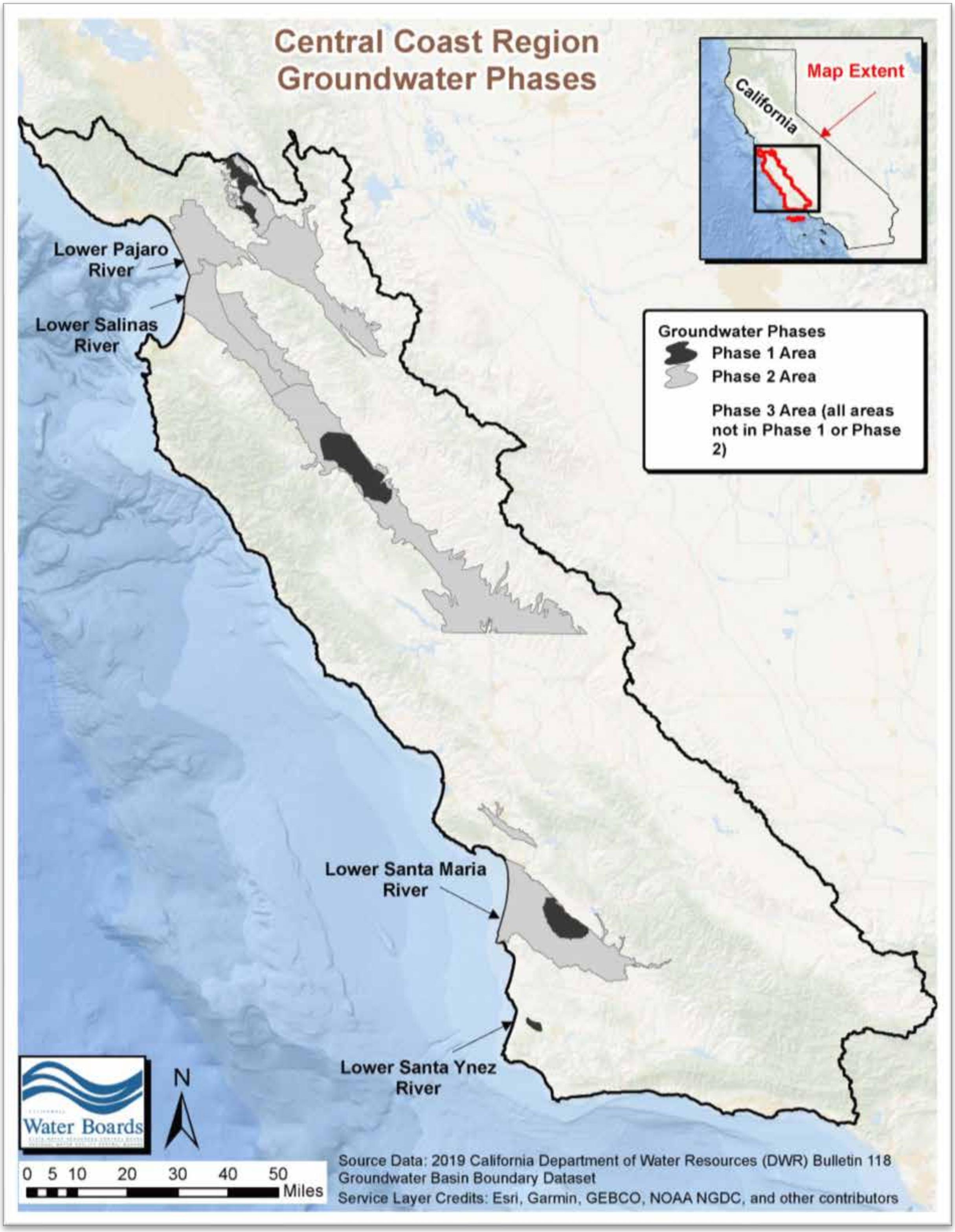


Figure C.1-1: Groundwater Phase Areas

Table C.1-2. Compliance Dates for Fertilizer Nitrogen Application Limits

Crop	90th Percentile A_{FER} =	Compliance Date	85th Percentile A_{FER} =	Compliance Date
Broccoli	295	12/31/2023	280	12/31/2025
Cauliflower	310		285	
Celery	360		330	
Lettuce	275		255	
Spinach	245		230	
Strawberry	320		295	
All Other Crops	500		480	

Note: For crops grown for less than one year (e.g., broccoli, lettuce, etc.), units are in pounds of nitrogen per acre per crop. In the situation where a Discharger grows a crop more than once during the year, e.g. grows a spring lettuce and a fall lettuce, the application limit applies to each of the crops separately: no more than 275 pounds of nitrogen per acre can be applied to the spring lettuce crop and no more than 275 pounds of nitrogen per acre can be applied to the fall lettuce crop. The two lettuce crops can be reported on separately or can be averaged together. For crops grown for more than one year (e.g., grapes, trees, etc.), units are in pounds of nitrogen per acre per year. The 90th and 85th percentile fertilizer nitrogen application limits were determined by using year 2014 to 2019 total nitrogen applied (TNA) reporting information.

Table C.1-3. Compliance Dates for Nitrogen Discharge Targets and Limits

	Compliance Date		
Compliance Pathway 1 $A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) + A_{IRR} – R =$	Target	500	12/31/2023
	Target	400	12/31/2025
	Limit	300	12/31/2027
	Limit	200	12/31/2031
	Limit	150	12/31/2036
	Limit	100	12/31/2041
	Limit	50	12/31/2051
OR			
	Compliance Date		
Compliance Pathway 2 $A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) = R$	Target	A = R	12/31/2023
	Target	A = R	12/31/2025
	Limit	A = R	12/31/2027
	Limit	A = R	12/31/2031
	Limit	A = R	12/31/2036
	Limit	A = R	12/31/2041
	Limit	A = R	12/31/2051
OR			
	Compliance Date		
Compliance Pathway 3 $A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) – R =$	Target	300	12/31/2023
	Target	200	12/31/2025
	Limit	100	12/31/2027
	Limit	0	12/31/2031
	Limit	-50	12/31/2036
	Limit	-100	12/31/2041
	Limit	-150	12/31/2051

Note: All units are in pounds of nitrogen per acre per year and represent all crops grown and harvested on the entire ranch. The initial 2027 nitrogen discharge limits will be re-evaluated based on discharger reported nitrogen applied and removed data, new science, and management practice implementation and assessment before becoming effective.

$\mathbf{A_{FER}}$ is the amount of fertilizer nitrogen applied in pounds per acre.
C is the compost discount factor used to represent the amount of compost nitrogen mineralized during the year that the compost was applied.
$\mathbf{A_{COMP}}$ is the total amount of compost nitrogen applied in pounds per acre.
$\mathbf{A_{IRR}}$ is the amount of nitrogen applied in the irrigation water estimated from the volume required for crop evapotranspiration (ET) in pounds per acre.
O is the organic fertilizer discount factor used to represent the amount of nitrogen mineralized during the first 12 weeks in the year it was applied.
$\mathbf{A_{ORG}}$ is the total amount of organic fertilizer or amendment nitrogen applied in pounds per acre.
R is the amount of nitrogen removed from the field through harvest, sequestration, or other removal methods, in pounds per acre.

Note: Report due dates to confirm compliance with the fertilizer application limits and nitrogen discharge targets and limits are included in the MRP.

Tables and Figures related to Part 2, Section C.2. Third-Party Alternative Compliance Pathway for Groundwater Protection

Table C.2-1. Compliance Dates for Fertilizer Nitrogen Application Targets (Alternative Compliance Pathway)

Crop	90th Percentile A_{FER} =	Compliance Date	85th Percentile A_{FER} =	Compliance Date
Broccoli	295	12/31/2024	280	12/31/2026
Cauliflower	310		285	
Celery	360		330	
Lettuce	275		255	
Spinach	245		230	
Strawberry	320		295	
All Other Crops	500		480	

Note: For crops grown for less than one year (e.g., broccoli, lettuce, etc.), units are in pounds of nitrogen per acre per crop. In the situation where a Discharger grows a crop more than once during the year, e.g. grows a spring lettuce and a fall lettuce, the application limit applies to each of the crops separately: no more than 275 pounds of nitrogen per acre can be applied to the spring lettuce crop and no more than 275 pounds of nitrogen per acre can be applied to the fall lettuce crop. The two lettuce crops can be reported on separately or can be averaged together. For crops grown for more than one year (e.g., grapes, trees, etc.), units are in pounds of nitrogen per acre per year. The 90th and 85th percentile fertilizer nitrogen application targets were determined by using year 2014 to 2019 total nitrogen applied (TNA) reporting information.

Table C.2-2. Compliance Dates for Nitrogen Discharge Targets (Alternative Compliance Pathway)

	Target	Compliance Date
Compliance Pathway 1 $A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) + A_{IRR} - R =$	500	12/31/2024
	400	12/31/2026
	300	12/31/2028
OR		
	Target	**Compliance Date**
Compliance Pathway 2 $A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) = R$	A = R	12/31/2024
	A = R	12/31/2026
	A = R	12/31/2028
OR		
	Target	**Compliance Date**
Compliance Pathway 3 $A_{FER} + (C \times A_{COMP}) + (O \times A_{ORG}) - R =$	300	12/31/2024
	200	12/31/2026
	100	12/31/2028

Notes: All units are in pounds of nitrogen per acre per year and represent all crops grown and harvested on the entire ranch. All compliance pathway variables are defined above under **Table C.1-3**. The final 2028 nitrogen discharge targets will be re-evaluated based on discharger reported nitrogen applied and removed data, new science, management practice implementation and assessment, and third-party GWP collective numeric interim and final targets before becoming effective.

Tables and Figures related to Part 2, Section C.3. Surface Water Protection

Table C.3-1. Surface Water Priority Areas

HUC-8 Number[1]	HUC-8 Name	Surface Water Priority
18060008	Santa Maria	Priority 1
18060005	Salinas	Priority 2
18060002	Pajaro	Priority 3
18060015	Monterey Bay	Priority 3
18060010	Santa Ynez	Priority 3
18050003	Coyote	Priority 4
18050006	San Francisco Coastal South	Priority 4
18060004	Estrella	Priority 4
18060006	Central Coastal	Priority 4
18060003	Carrizo Plain	Priority 4
18060007	Cuyama	Priority 4
18060009	San Antonio	Priority 4
18060013	Santa Barbara Coastal	Priority 4
18060014	Santa Barbara Channel Islands	Priority 4
18070101	Ventura	Priority 4

[1]As defined by the National Hydrography Dataset Plus Watershed Boundary Dataset

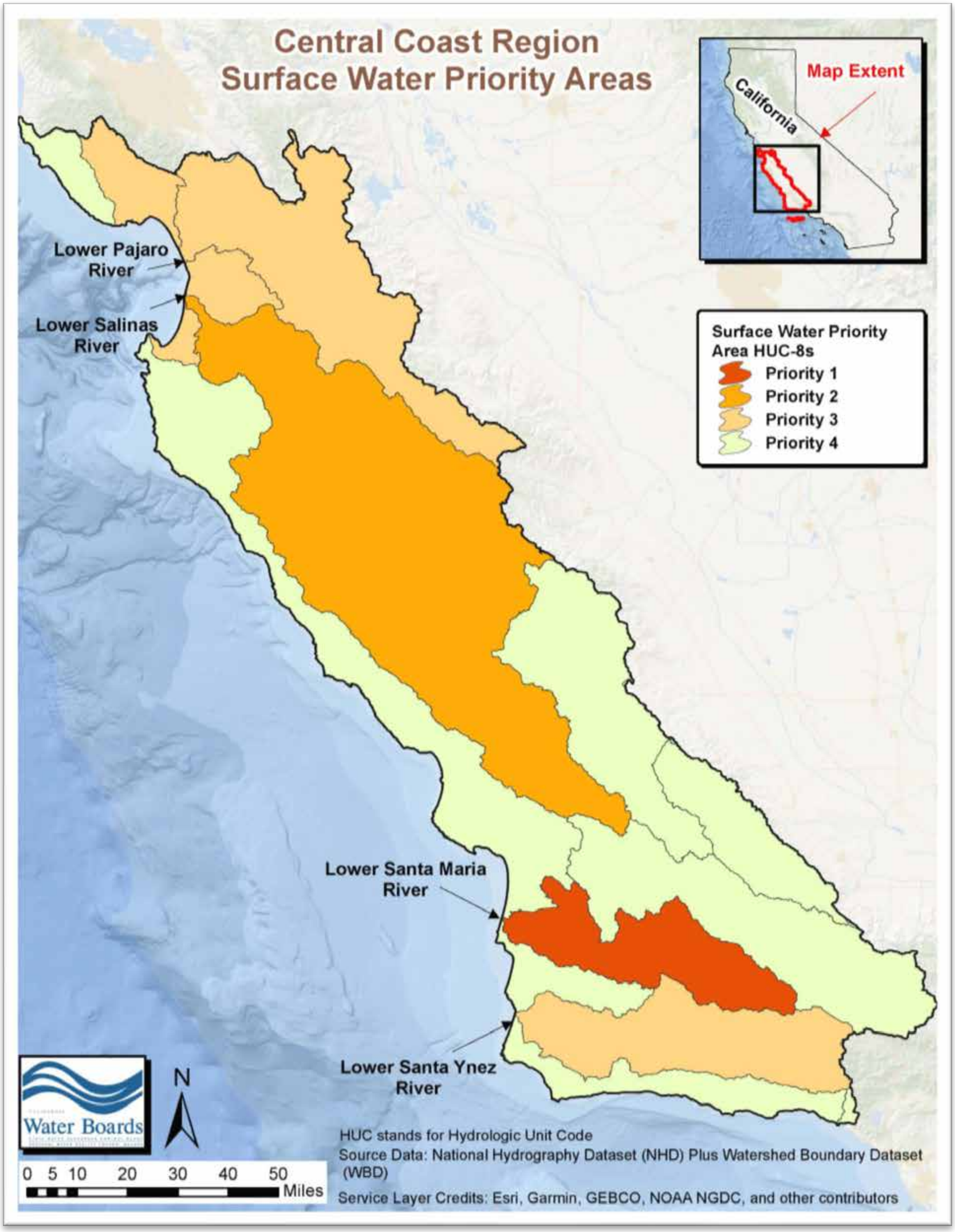


Figure C-3.1: Surface Water Priority Areas

Table C.3-1.3P. Surface Water Priority Areas (Third-Party Program)

High Priority	
305FUF	Furlong Creek at Frazier Lake Road
309ALG	Salinas Reclamation Canal at La Guardia
309CCD	Chualar Creek west of Highway 101
309CRR	Chualar Creek North Branch east of Highway 101
309ESP	Espinosa Slough upstream from Alisal Slough
309JON	Salinas Reclamation Canal at San Jon Road
309MER	Merrit Ditch upstream of Highway 183
309NAD	Natividad Creek upstream of Salinas Reclamation Canal
309OLD	Old Salinas River at Monterey Dunes Way
309QUI	Quail Creek at culvert on east side of Highway 101
309TEH	Tembladero Slough at Haro Street
312BCC	Bradley Canyon Creek at Culvert
312BCJ	Bradley Channel at Jones Street
312GVS	Green Valley at Simas
312MSD	Main Street Canal upstream of Ray Road at Highway 166
312OFC	Oso Flaco Creek at Oso Flaco Lake Road
312ORC	Orcutt Solomon Creek upstream of Santa Maria River
312ORI	Orcutt Solomon Creek at Highway 1
312SMA	Santa Maria River at Estuary
Medium Priority	
305BRS	Beach Road Ditch at Shell Road
305CAN	Carnadero Creek upstream of Pajaro River
305CHI	Pajaro River at Chittenden Gap
305FRA	Pajaro River Millers Canal at Frazier Lake Road
305LCS	Llagas Creek at Southside Avenue
305PJP	Pajaro River at Main Street
305SJA	San Juan Creek at Anzar Road
305TSR	Tequisquita Slough upstream of Pajaro River at Shore Road
305WCS	Watsonville Creek at Elkhorn Road / Hudson Landing
309ASB	Alisal Slough at White Barn
309BLA	Blanco Drain below Pump
309GAB	Gabilan Creek at Boronda Road
309MOR	Moro Cojo Slough at Highway 1
309RTA	Santa Rita Creek at Santa Rita Creek Park
310LBC	Los Berros Creek at Century Road
310PRE	Prefumo Creek at Calle Joaquin
310USG	Arroyo Grande Creek at old USGS Gauge
310WRP	Warden Creek at Wetlands Restoration Preserve
312OFN	Little Oso Flaco Creek
312SMI	Santa Maria at Highway 1
313SAE	San Antonio Creek at San Antonio Road east
314SYN	Santa Ynez River at 13th
315BEF	Bell Creek at Winchester Canyon Park
315FMV	Franklin Creek at Mountain View Lane
315GAN	Glenn Annie Creek
315LCC	Los Carneros Creek at Calle Real

Low Priority	
305COR	Salsipuedes Creek downstream of Corralitos Creek upstream of HWY 129
305WSA	Watsonville Slough at San Andreas Road
309GRN	Salinas River (Mid) at Elm Road in Greenfield
309SAC	Salinas River at Chualar
309SAG	Salinas River at Gonzales River Road Bridge
309SSP	Salinas River (Lower) at Spreckles Gauge
310CCC	Chorro Creek upstream of Chorro Flats
314SYF	Santa Ynez River at Flordale
314SYL	Santa Ynez River at River Park
315APF	Arroyo Paredon Creek at Foothill Bridge
All Other Areas	Low priority also includes all other areas not in high or medium priority areas

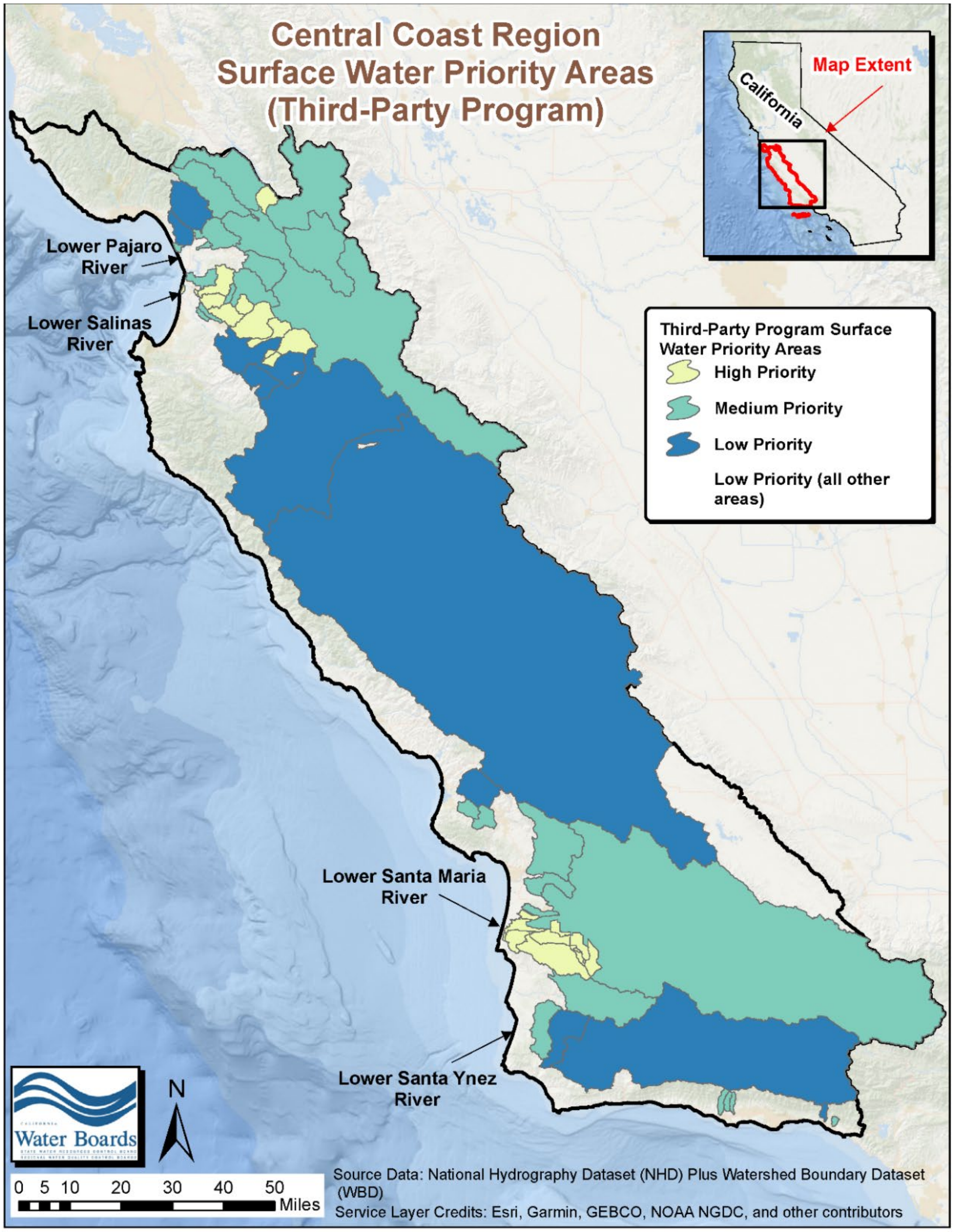


Figure C-3.1.3P: Surface Water Priority Areas (Third-Party Program)

Table C.3-2. Compliance Dates for Nutrient Limits (TMDL areas)

TMDL Project Name	Constituent	Matrix	Limit[1]	Units[2]	Compliance Date
Arroyo Paredon Nitrate TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032
Bell Creek Nitrate TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032
Franklin Creek Nutrients TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032
Franklin Creek Nutrients TMDL	Total Nitrogen, as N	Water Column	Wet Season: 8.0	mg/L	3/4/2034
Franklin Creek Nutrients TMDL	Total Phosphorous	Water Column	Wet Season: 0.3	mg/L	3/4/2034
Franklin Creek Nutrients TMDL	Total Nitrogen, as N	Water Column	Dry Season: 1.1	mg/L	3/4/2044
Franklin Creek Nutrients TMDL	Total Phosphorous	Water Column	Dry Season: 0.075	mg/L	3/4/2044
Glen Annie Canyon, Tecolotito Creek, & Carneros Creek Nitrate TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032
Los Berros Creek Nitrate TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032
Los Osos Creek, Warden Creek, and Warden Lake Wetland Nutrient TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032

TMDL Project Name	Constituent	Matrix	Limit[1]	Units[2]	Compliance Date
Lower Salinas River Watershed Nutrient TMDL	Ammonia (Un-Ionized), as N[3]	Water Column	0.025	mg/L	12/31/2032
Lower Salinas River Watershed Nutrient TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032
Lower Salinas River Watershed Nutrient TMDL	Total Nitrogen, as N[4]	Water Column	Wet Season: 8.0	mg/L	5/7/2034
Lower Salinas River Watershed Nutrient TMDL	Nitrate, as N	Water Column	Wet Season: 8.0	mg/L	5/7/2034
Lower Salinas River Watershed Nutrient TMDL	Orthophosphate, as P	Water Column	Wet Season: 0.3	mg/L	5/7/2034
Lower Salinas River Watershed Nutrient TMDL	Total Nitrogen, as N[4]	Water Column	Dry Season: 1.7	mg/L	5/7/2044
Lower Salinas River Watershed Nutrient TMDL	Nitrate, as N	Water Column	Dry Season: 1.4 – 6.4[1]	mg/L	5/7/2044
Lower Salinas River Watershed Nutrient TMDL	Orthophosphate, as P	Water Column	Dry Season: 0.07 – 0.13[1]	mg/L	5/7/2044

TMDL Project Name	Constituent	Matrix	Limit[1]	Units[2]	Compliance Date
Pajaro River Watershed Nutrient TMDL	Ammonia (Un-ionized), as N[3]	Water Column	0.025	mg/L	12/31/2032
Pajaro River Watershed Nutrient TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032
Pajaro River Watershed Nutrient TMDL	Total Nitrogen, as N	Water Column	Wet Season: 8.0	mg/L	12/31/2032
Pajaro River Watershed Nutrient TMDL	Nitrate, as N	Water Column	Wet Season: 8.0	mg/L	12/31/2032
Pajaro River Watershed Nutrient TMDL	Orthophosphate, as P	Water Column	Wet Season: 0.3	mg/L	12/31/2032
Pajaro River Watershed Nutrient TMDL	Total Nitrogen, as N[5]	Water Column	Dry Season: 1.1 – 2.1[1]	mg/L	7/12/2041
Pajaro River Watershed Nutrient TMDL	Nitrate, as N	Water Column	Dry Season: 1.8 – 3.9[1]	mg/L	7/12/2041
Pajaro River Watershed Nutrient TMDL	Orthophosphate, as P	Water Column	Dry Season: 0.04 – 0.14[1]	mg/L	7/12/2041
San Luis Obispo Creek Nitrate TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032

TMDL Project Name	Constituent	Matrix	Limit[1]	Units[2]	Compliance Date
Santa Maria River Watershed Nutrients TMDL	Ammonia (Un-Ionized), as N[3]	Water Column	0.025	mg/L	12/31/2032
Santa Maria River Watershed Nutrients TMDL	Nitrate, as N	Water Column	10.0	mg/L	12/31/2032
Santa Maria River Watershed Nutrients TMDL	Nitrate, as N	Water Column	Wet Season or Year-Round: 5.7 – 8.0[1]	mg/L	5/22/2034
Santa Maria River Watershed Nutrients TMDL	Orthophosphate, as P	Water Column	Wet Season or Year-Round: 0.08 – 0.3[1]	mg/L	5/22/2034
Santa Maria River Watershed Nutrients TMDL	Nitrate, as N	Water Column	Dry Season: 4.3	mg/L	5/22/2044
Santa Maria River Watershed Nutrients TMDL	Orthophosphate, as P	Water Column	Dry Season: 0.19	mg/L	5/22/2044

[1]The Lower Salinas River Watershed Nutrient TMDL, Pajaro River Watershed Nutrient TMDL, and Santa Maria River Watershed Nutrient TMDL include load allocations for specific waterbody reaches within the TMDL project area. The limits for those TMDLs are summarized in this table as ranges; however, the exact load allocation values for each reach apply as described in the TMDL and Basin Plan and will be assessed as numeric limits for the purposes of this Order.
[2]mg/L is milligrams per liter
[3]Calculated using total ammonia and onsite instream measurements (field measurements) of pH and water temperature.
[4]Total nitrogen TMDL load allocation applies to Moro Cojo Slough only.
[5]Total nitrogen TMDL load allocation applies to the following sloughs: Watsonville, Harkins, Gallighan, and Struve.

Table C.3-3. Compliance Dates for Nutrient Limits (Non-TMDL areas)

Constituent Group	Constituent	Matrix	Limit	Units[1]	Compliance Date
Nutrients	Nitrate, as Nitrogen	Water Column	10.0	mg/L	12/31/2032
Nutrients	Ammonia (un-ionized), as Nitrogen[2]	Water Column	0.025	mg/L	12/31/2032

[1]mg/L is milligrams per liter
[2]Calculated using total ammonia and onsite instream measurements (field measurements) of pH and water temperature.

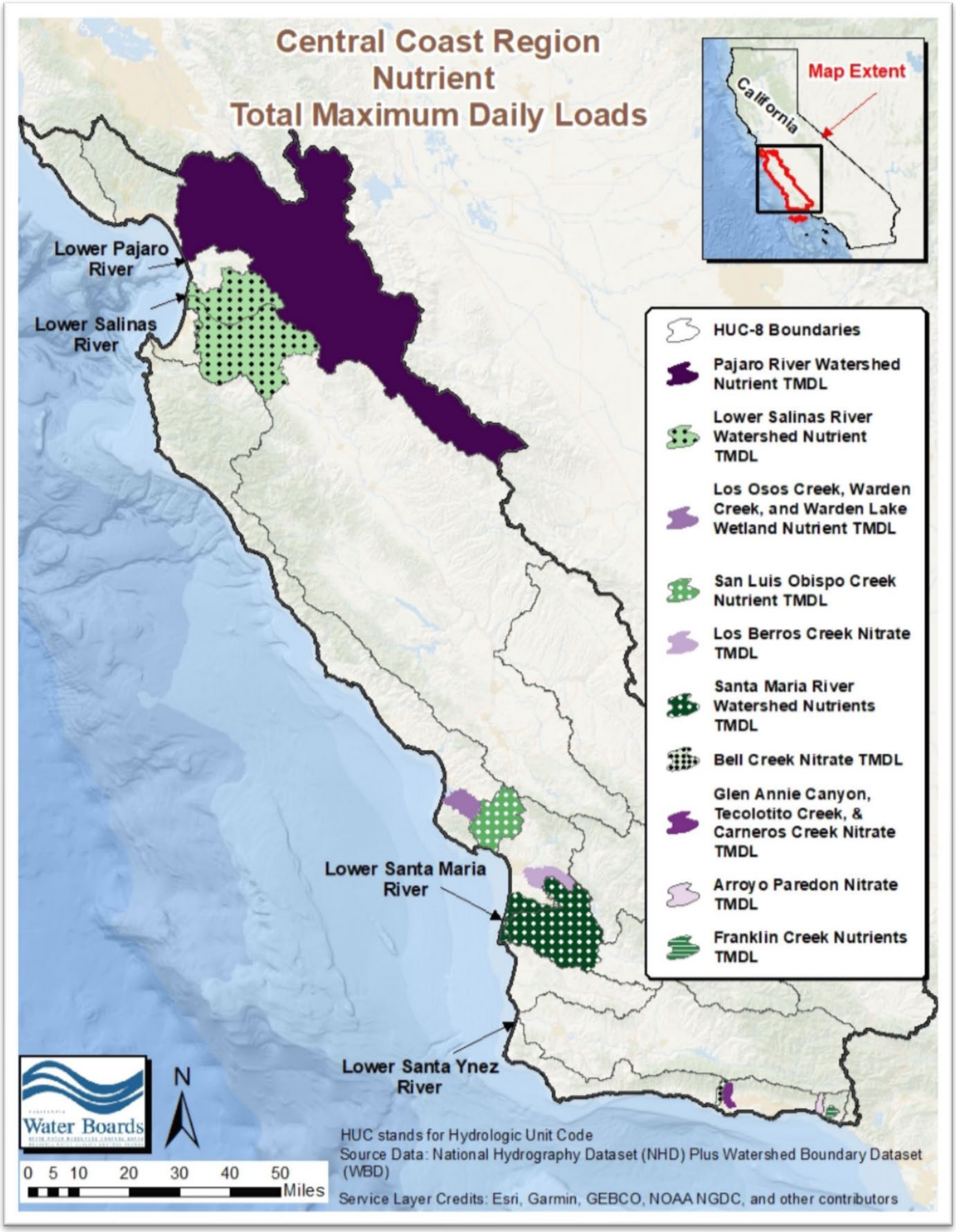


Figure C.3-2: Nutrient TMDL Areas

Table C.3-4. Compliance Dates for Pesticide and Toxicity Limits (TMDL areas)

TMDL Project Name	Constituent[1]	Matrix	Limit[2]	Units[3]	Compliance Date
Arroyo Paredon Diazinon TMDL	Additive Toxicity (Chlorpyrifos and Diazinon)	Water Column	Sum of Additive Toxicity, TU ≤ 1.0	TU	12/31/2032
Arroyo Paredon Diazinon TMDL	Diazinon	Water Column	CCC: 0.10 CMC: 0.16	µg/L	12/31/2032
Lower Salinas River Watershed Chlorpyrifos and Diazinon TMDL	Chlorpyrifos[4]	Water Column	CCC: 0.015 CMC: 0.025	µg/L	12/31/2032
Lower Salinas River Watershed Chlorpyrifos and Diazinon TMDL	Diazinon[4]	Water Column	CCC: 0.10 CMC: 0.16	µg/L	12/31/2032
Lower Salinas River Watershed Chlorpyrifos and Diazinon TMDL	Additive Toxicity (Chlorpyrifos and Diazinon)	Water Column	Sum of Additive Toxicity, TU ≤ 1.0	TU	12/31/2032

TMDL Project Name	**Constituent[1]**	**Matrix**	**Limit[2]**	**Units[3]**	**Compliance Date**
Lower Salinas River Watershed Sediment Toxicity and Pyrethroids in Sediment TMDL	Additive Toxicity (Pyrethroids)	Sediment	Sum of Pyrethroid TU < 1.0	TU	12/31/2032
Lower Salinas River Watershed Sediment Toxicity and Pyrethroids in Sediment TMDL	Aquatic Toxicity	Sediment	No significant toxic effect, 10-day, chronic exposure with *Hyalella azteca*	Survival endpoint	12/31/2032
Pajaro River Watershed Chlorpyrifos and Diazinon TMDL	Additive Toxicity (Chlorpyrifos and Diazinon)	Water Column	Sum of Additive Toxicity, TU ≤ 1.0	TU	12/31/2032
Pajaro River Watershed Chlorpyrifos and Diazinon TMDL	Chlorpyrifos	Water Column	CCC: 0.015 CMC: 0.025	µg/L	12/31/2032
Pajaro River Watershed Chlorpyrifos and Diazinon TMDL	Diazinon	Water Column	CCC: 0.10 CMC: 0.16	µg/L	12/31/2032

TMDL Project Name	Constituent[1]	Matrix	Limit[2]	Units[3]	Compliance Date
Pajaro River Watershed Chlorpyrifos and Diazinon TMDL	Aquatic Toxicity	Sediment	No significant toxic effect, 10-day, chronic exposure with *Hyalella azteca*	Survival and reproduction endpoints	12/31/2032
Pajaro River Watershed Chlorpyrifos and Diazinon TMDL	Aquatic Toxicity	Water Column	No significant toxic effect, 7-day, chronic exposure with *Ceriodaphnia dubia*	Survival and reproduction endpoints	12/31/2032
Santa Maria River Watershed Toxicity and Pesticide TMDL	Additive Toxicity (Chlorpyrifos and Diazinon)	Water Column	Sum of Additive Toxicity, TU ≤ 1.0	TU	12/31/2032
Santa Maria River Watershed Toxicity and Pesticide TMDL	Chlorpyrifos	Water Column	CCC: 0.015 CMC: 0.025	µg/L	12/31/2032
Santa Maria River Watershed Toxicity and Pesticide TMDL	Diazinon	Water Column	CCC: 0.10 CMC: 0.16	µg/L	12/31/2032

TMDL Project Name	Constituent[1]	Matrix	Limit[2]	Units[3]	Compliance Date
Santa Maria River Watershed Toxicity and Pesticide TMDL	Malathion	Water Column	CCC: 0.028 CMC: 0.17	µg/L	12/31/2032
Santa Maria River Watershed Toxicity and Pesticide TMDL	Additive Toxicity (Pyrethroids)	Sediment	Sum of Pyrethroid TU $\leq$ 1.0	TU	12/31/2032
Santa Maria River Watershed Toxicity and Pesticide TMDL	Aquatic Toxicity	Sediment	No significant toxic effect, 10-day, chronic exposure with *Hyalella azteca*	Survival endpoint	Not Defined[5]
Santa Maria River Watershed Toxicity and Pesticide TMDL	Aquatic Toxicity	Water Column	No significant toxic effect, 6-8 day, chronic exposure with *Ceriodaphnia dubia*	Survival and reproduction endpoints	Not Defined[5]
Santa Maria River Watershed Toxicity and Pesticide TMDL	4,4'-DDT (p,p-DDT)	Sediment	6.5	µg/kg o.c.	10/29/2044

TMDL Project Name	Constituent[1]	Matrix	Limit[2]	Units[3]	Compliance Date
Santa Maria River Watershed Toxicity and Pesticide TMDL	4,4’-DDE (p,p-DDE)	Sediment	5.5	µg/kg o.c.	10/29/2044
Santa Maria River Watershed Toxicity and Pesticide TMDL	4,4’-DDD (p,p-DDD)	Sediment	9.1	µg/kg o.c.	10/29/2044
Santa Maria River Watershed Toxicity and Pesticide TMDL	Total DDT (Sediment)	Sediment	10.0	µg/kg o.c.	10/29/2044
Santa Maria River Watershed Toxicity and Pesticide TMDL	Chlordane	Sediment	1.7	µg/kg o.c.	10/29/2044
Santa Maria River Watershed Toxicity and Pesticide TMDL	Dieldrin	Sediment	0.14	µg/kg o.c.	10/29/2044
Santa Maria River Watershed Toxicity and Pesticide TMDL	Endrin	Sediment	550.0	µg/kg o.c.	10/29/2044

TMDL Project Name	Constituent[1]	Matrix	Limit[2]	Units[3]	Compliance Date
Santa Maria River Watershed Toxicity and Pesticide TMDL	Toxaphene	Sediment	20.0	µg/kg o.c.	10/29/2044

[1]Toxic units and/or additive toxicity units are calculated using the relevant biological indicators, as described in the applicable TMDL, e.g. LC50, CCC, or CMC.
[2]CCC is Criterion Continuous Concentration or chronic (4-day (96-hour) average), not to be exceeded more than once in a three year period; CMC is Criterion Maximum Concentration or acute (1- hour average) not to be exceeded more than once in a three year period; the sum of additive toxicity is calculated by dividing each measured chemical concentration by that chemical's criterion (CCC or CMC) and summing those values as defined in the staff report for the respective TMDL project.
[3]µg/L is micrograms per liter; µg/kg is micrograms per kilogram; ng/g is nanograms per gram; o.c. means normalized for sediment organic carbon content; ppb is parts per million.
[4]Apply only when one of the two compounds (chlorpyrifos or diazinon) is present.
[5]A time schedule for aquatic toxicity was not identified in the Santa Maria River Watershed Toxicity and Pesticide TMDL; therefore, Dischargers in this area must comply with the aquatic toxicity compliance date defined in Table C.3-2.

Table C-3.5. Compliance Dates for Pesticide and Toxicity Limits (Non-TMDL areas)

Constituent Group	Constituent	Matrix	Limit[1]	Units[2]	Compliance Date
Pesticides	Acetamiprid	Water Column	2.10	µg/L	12/31/2032
Pesticides	Atrazine	Water Column	60.0	µg/L	12/31/2032
Pesticides	Bifenthrin	Sediment	0.52	µg/g o.c.	12/31/2032
Pesticides	Chlorpyrifos	Water Column	0.023	µg/L	12/31/2032
Pesticides	Chlorpyrifos	Sediment	1.77	µg/g o.c.	12/31/2032
Pesticides	Clothianidin	Water Column	0.05	µg/L	12/31/2032
Pesticides	Cyanazine	Water Column	27.0	µg/L	12/31/2032
Pesticides	Cyfluthrin	Sediment	1.08	µg/g o.c.	12/31/2032
Pesticides	Cypermethrin	Sediment	0.38	µg/g o.c.	12/31/2032
Pesticides	Danitol (fenpropathrin)	Sediment	1.10	µg/g o.c.	12/31/2032
Pesticides	Demeton-s-methyl sulfoxide (oxydemeton-methyl)	Water Column	46	µg/L	12/31/2032
Pesticides	Diazinon	Water Column	0.105	µg/L	12/31/2032
Pesticides	Dichlorvos	Water Column	0.0058	µg/L	12/31/2032
Pesticides	Dimethoate	Water Column	0.50	µg/L	12/31/2032
Pesticides	Dinotefuran	Water Column	23.5	µg/L	12/31/2032
Pesticides	Disulfoton (Disyton)	Water Column	0.01	µg/L	12/31/2032
Pesticides	Diuron	Water Column	80.0	µg/L	12/31/2032
Pesticides	Esfenvalerate	Sediment	1.54	µg/g o.c.	12/31/2032
Pesticides	Fenvalerate	Sediment	1.54	µg/g o.c.	12/31/2032
Pesticides	Glyphosate	Water Column	26,600	µg/L	12/31/2032
Pesticides	Imidacloprid	Water Column	0.01	µg/L	12/31/2032
Pesticides	Cyhalothrin, lambda	Sediment	0.45	µg/g o.c.	12/31/2032
Pesticides	Linuron	Water Column	0.09	µg/L	12/31/2032
Pesticides	Malathion	Water Column	0.049	µg/L	12/31/2032
Pesticides	Methamidophos	Water Column	4.50	µg/L	12/31/2032
Pesticides	Methidathion	Water Column	0.66	µg/L	12/31/2032

Constituent Group	Constituent	Matrix	Limit[1]	Units[2]	Compliance Date
Pesticides	Paraquat	Water Column	< 36.9	µg/L	12/31/2032
Pesticides	Parathion-methyl	Water Column	0.25	µg/L	12/31/2032
Pesticides	Permethrin	Sediment	10.83	µg/g o.c.	12/31/2032
Pesticides	Phorate	Water Column	0.21	µg/L	12/31/2032
Pesticides	Phosmet	Water Column	0.80	µg/L	12/31/2032
Pesticides	Simazine	Water Column	40.0	µg/L	12/31/2032
Pesticides	Thiacloprid	Water Column	0.97	µg/L	12/31/2032
Pesticides	Thiamethoxam	Water Column	0.74	µg/L	12/31/2032
Pesticides	Trifluralin	Water Column	2.40	µg/L	12/31/2032
Toxicity	Sediment Toxicity	Sediment	No significant effect based on chronic or acute toxicity to applicable test organism	Survival, growth, and reproduction endpoints[3]	12/31/2032
Toxicity	Water Column Toxicity	Water Column	No significant effect based on chronic or acute toxicity to applicable test organism	Survival, growth, and reproduction endpoints[3]	12/31/2032
Toxicity	Toxic Units	Sediment	Sum of additive toxicity ≤ 1	Toxic Unit (TU)[4]	12/31/2032
Toxicity	Toxic Units	Water Column	Sum of additive toxicity ≤ 1	Toxic Unit (TU)[4]	12/31/2032

[1]Attachment A to this Order describes the sources of the limits established in this table.
[2]µg/L is micrograms per liter; µg/kg is micrograms per kilogram; ng/g is nanograms per gram; o.c. means normalized for sediment organic carbon content; ppb is parts per million.
[3]Toxicity determinations will be pass/fail based on a comparison of the test organism's response (survival, growth, and reproduction) to the water sample compared to the control using the Test of Significant Toxicity (TST statistical approach), or a statistical t-test, based on the toxicity provisions in the State Water Board *Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries in California* (in draft). If a sample is declared "fail" (i.e., toxic) for any endpoint, then the limit is not met. The most sensitive test species for each constituent must be used when evaluating toxicity.
[4]Toxic units (TU) and/or additive toxicity units are calculated using the relevant biological indicators, e.g. LC50, CCC, or CMC as follows: Calculate additive toxicity for organophosphate pesticides in non-TMDL watersheds as defined in the TMDL for Chlorpyrifos and Diazinon in the Lower Salinas River Watershed; and calculate TUs for pyrethroid pesticides in non-TMDL watersheds as defined in the TMDL for Sediment Toxicity and Pyrethroids in the Lower Salinas River Watershed.

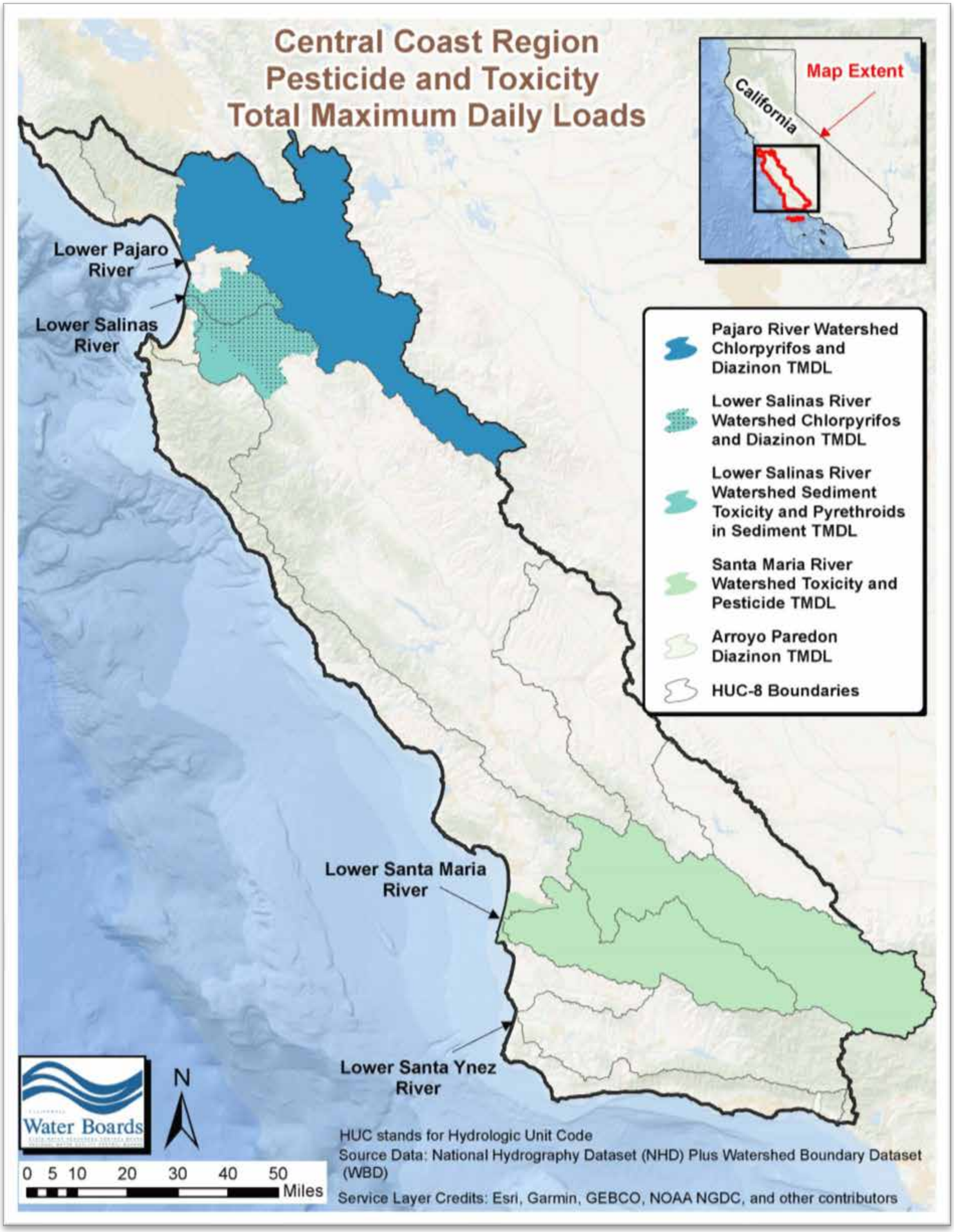


Figure C.3-3: Pesticide and Toxicity TMDL Areas

Table C.3-6. Compliance Dates for Sediment Limits (TMDL areas)

TMDL Project Name	Constituent	Limit[1]	Units	Compliance Date
Morro Bay Sediment TMDL	Sediment	285 – 6,662	Tons of sediment per year	12/3/2053
Pajaro River Watershed Sediment TMDL	Sediment	447 – 4,114	Tons of sediment per year	11/27/2051

[1]The Morro Bay Sediment TMDL and Pajaro River Watershed Sediment TMDL include load allocations for specific waterbody reaches within the TMDL project area. The limits for those TMDLs are summarized in this table as ranges; however, the exact load allocation values for each reach apply as described in the TMDL and Basin Plan and will be assessed as numeric limits for the purposes of this Order.

Table C.3-7. Compliance Dates for Turbidity Limits (Non-TMDL areas)

Constituent Group	Constituent	Beneficial Use	Limit	Units[1]	Compliance Date
Physical Parameters and General Chemistry	Turbidity	WARM	40.0	NTU	12/31/2032
Physical Parameters and General Chemistry	Turbidity	COLD	25.0	NTU	12/31/2032

[1]NTU is nephelometric turbidity units

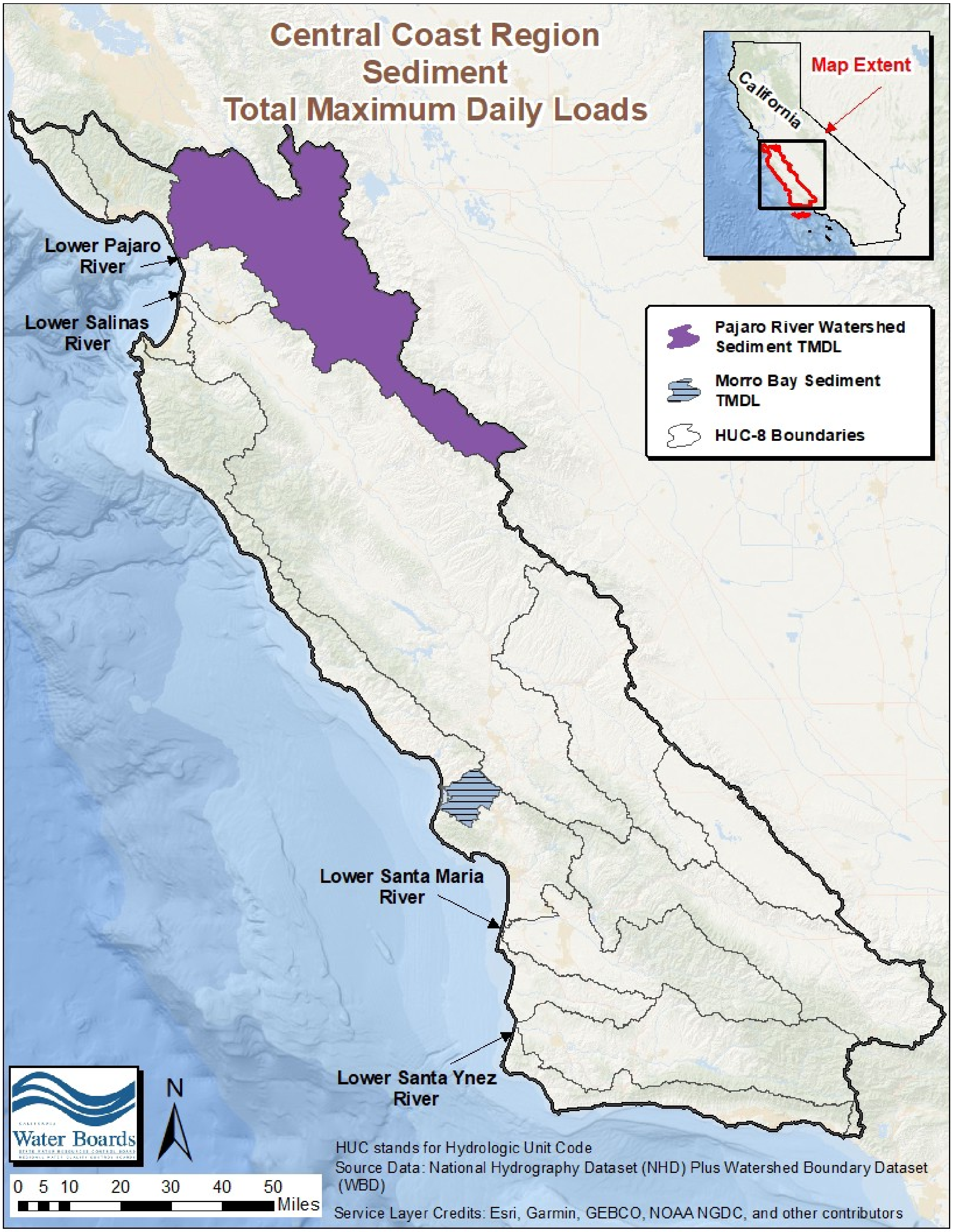


Figure C.3-4: Sediment TMDL Areas

Chapter 7
Appendix 7-F

Interconnected Surface Water Monitoring Network

APPENDIX 7F

INTERCONNECTED SURFACE WATER MONITORING NETWORK

The interconnected surface water (ISW) monitoring network in the Salinas Valley Groundwater Basin is based on the approach recommended by the Environmental Defense Fund (EDF, 2018), which uses groundwater elevations as surrogates for streamflow depletion rates. EDF notes that the change in hydraulic gradient between stream stage and surrounding groundwater elevations is representative of variance in interconnection between surface water and groundwater. Thus, monitoring the gradient also monitors interconnection. The gradient will be monitored by measured shallow groundwater elevations.

The ISW monitoring network focuses on adding wells near USGS stream gauges and MCWRA River Series measurement sites, as shown in Figure 1. Existing wells from the MCWRA's groundwater elevation monitoring programs will be used for the ISW monitoring network. Criteria for selecting an existing monitoring well include (1) a total well depth of approximately 200 feet or less, and (2) recent (post-2014) measured groundwater elevations that are shallow (generally about 30 feet below land surface). SVBGSA has identified 11 existing monitoring wells that fit these criteria, shown in Figure 1. Where possible, an individual monitoring well should be located between the ISW and any pumping centers, and at a distance away from the Salinas River and its tributaries so groundwater levels are not strongly driven by surface water flows (EDF, 2018). However, active pumping wells are distributed throughout the Salinas Valley, including in close proximity to ISW locations and existing monitoring wells. Distance from the Salinas River was considered when selecting existing monitoring wells, and review of historical groundwater level and streamflow measurements indicate that groundwater elevations in the selected wells are not strongly driven by surface water flows. Additionally, the lateral and vertical extent of the Salinas Valley Aquitard (SVA) was considered in the selection of existing wells to add to the ISW monitoring network, as the monitoring network only applies to surface water connected to principal aquifers. The SVA separates the shallow sediments from the principal aquifers in most of the 180/400-Foot Aquifer Subbasin and becomes intermittent towards the Monterey and Eastside Aquifer Subbasins. In the 180/400-Foot Aquifer Subbasin, connection is likely between the shallow sediments and the 180-Foot Aquifer where the potential existing monitoring wells are located, based in part on limited lithologic information available from the DWR's Online System for Well Completion Reports. These existing wells provide the best available tools for establishing an initial network for monitoring impacts on ISW from groundwater pumping. SVBGSA is in the process of establishing this monitoring network, and the network will be adjusted during GSP implementation as needed, particularly if any wells are determined to be ineffective or inaccessible for this purpose.

Table 1 provides a summary of the 11 selected wells, their corresponding USGS gauge or MCWRA River Series measurement site, and distance to the Salinas River or its tributaries. SVBGSA will request access from MCWRA to each well's groundwater elevation records and permission to add to the ISW monitoring network.

Table 1. Potential Existing Interconnected Surface Water Monitoring Wells

Well Name	Well Depth (ft)	Reference Point (ft)	Corresponding USGS Stream Gauge/ MCWRA River Series Measurement Site	Subbasin
16S/02E-02D01	106*	285.0	USGS Gauge in El Toro Creek near Spreckels	Monterey – Corral De Tierra
16S/04E-08H01	175	75.4	USGS Gauge in Salinas River near Chualar	180/400-Foot
16S/05E-31P02	115	118.2	River Series Site at Gonzalez	180/400-Foot
17S/06E-33R02	120	194.6	USGS Gauge in Salinas River at Soledad USGS Gauge in Arroyo Seco below Reliz Creek near Soledad	Forebay
18S/06E-03P01	195	189.0	USGS Gauge in Salinas River at Soledad USGS Gauge in Arroyo Seco below Reliz Creek near Soledad	Forebay
18S/07E-32G02	150	252.0	River Series Site at Greenfield	Forebay Aquifer
19S/07E-14H01	200	261.0	N/A (in Upper Valley near border with Forebay)	Upper Valley
20S/08E-07F01	189	292.4	River Series Site at King City	Upper Valley
21S/09E-16E01	100	358.0	River Series Site at San Lucas	Upper Valley
22S/10E-16P01	178	425.0	N/A (in between Bradley USGS Gauge and San Lucas River Series Site)	Upper Valley
23S/10E-14D01	142	462.7	USGS Gauge in Salinas River near Bradley	Upper Valley

*No well depth available, instead the depth of the bottom of screen interval is provided.

MONTGOMERY & ASSOCIATES

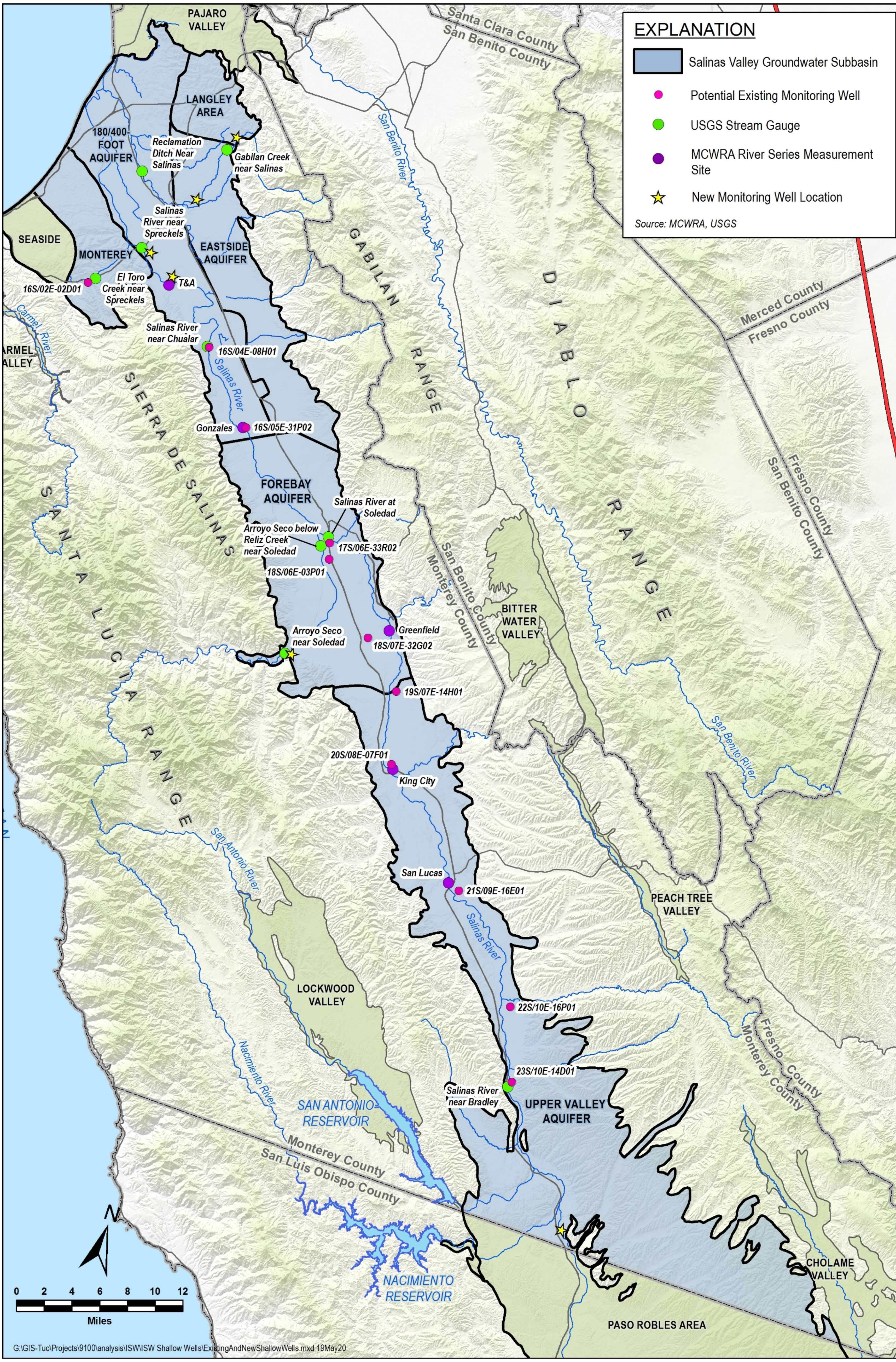


Figure 1. Locations of USGS Stream Gauges, MCWRA River Series Measurement Sites, Potential Existing Interconnected Surface Water Monitoring Wells, and Proposed New Interconnected Surface Water Monitoring Wells

Data gaps in the ISW monitoring network exist despite the identification of 11 existing monitoring wells. The SVBGSA will install new wells to fill these data gaps, as shown in Figure 1. As mentioned in the 180/400-Foot Aquifer Subbasin GSP, SVBGSA will drill and install up to two new wells for ISW monitoring in the Subbasin. SVBGSA will also drill one new shallow groundwater elevation monitoring well in each of the Langley Area, Eastside Aquifer, Forebay Aquifer, and Upper Valley Aquifer Subbasins:

- Langley Area Subbasin: Located along Gabilan Creek, which has a USGS gage located nearby in the Eastside Aquifer Subbasin.
- Eastside Aquifer Subbasin: Located nearby the identified ISW location within the City of Salinas on Natividad Creek, as shown in Chapter 8. This is the only potential location of ISW in the Eastside Subbasin.
- Forebay Aquifer Subbasin: Located along the upper Arroyo Seco, near the USGS gage on the Arroyo Seco. This area is a potential steelhead refugia.
- Upper Valley Aquifer Subbasin: Located along the Salinas River near the southern boundary of the basin, upstream of the San Antonio and Nacimiento Rivers.

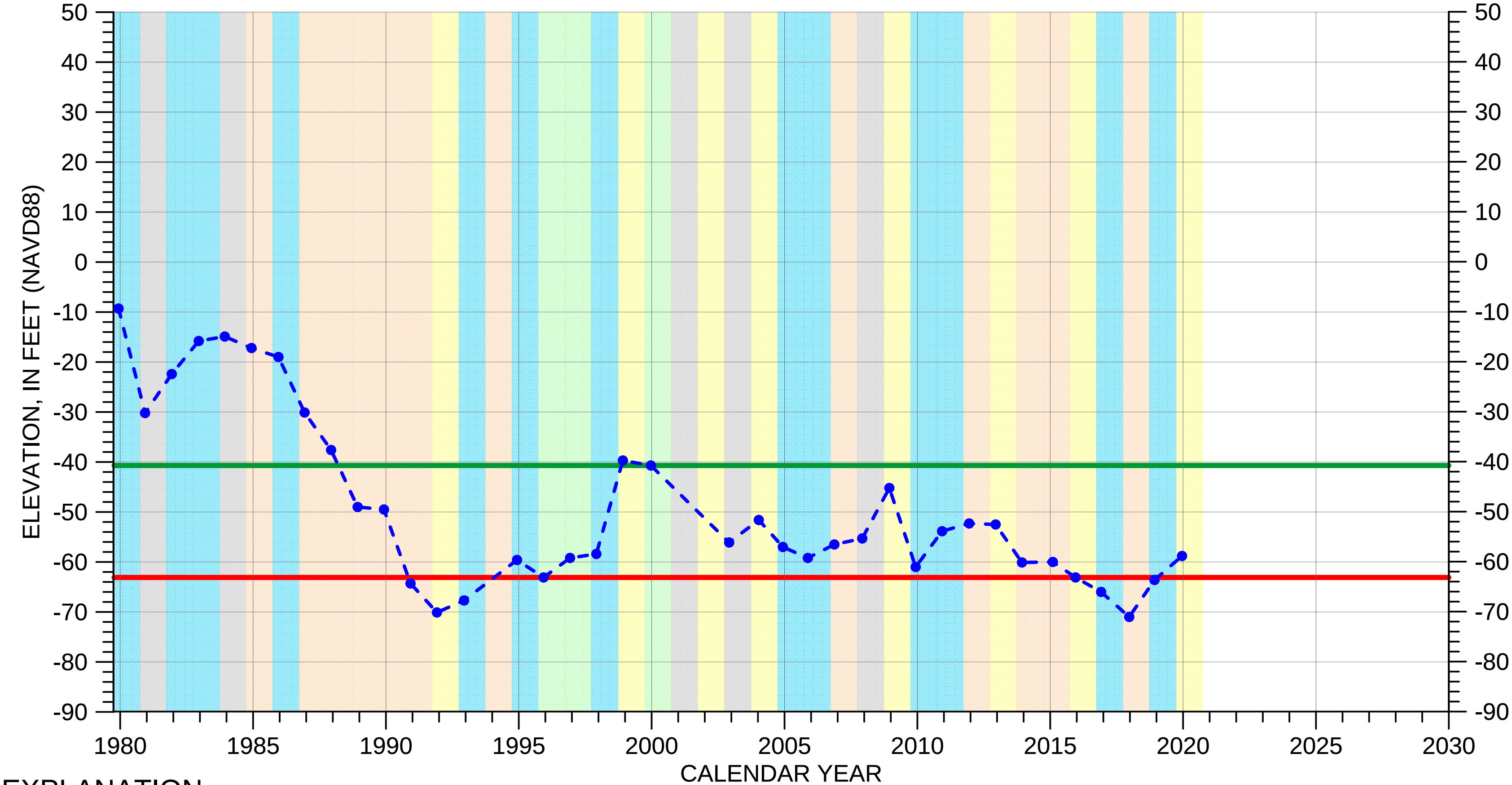
If feasible, the new ISW monitoring wells will be installed in conjunction with the new wells needed to fill the data gaps in the groundwater elevation monitoring networks in the 180/400-Foot Aquifer, Langley Area, and Upper Valley Aquifer Subbasins that are discussed in Chapter 7.

Chapter 8
Appendix 8-A

Hydrographs with Minimum Thresholds and Measurable Objectives

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-03K01

Eastside Aquifer Subbasin

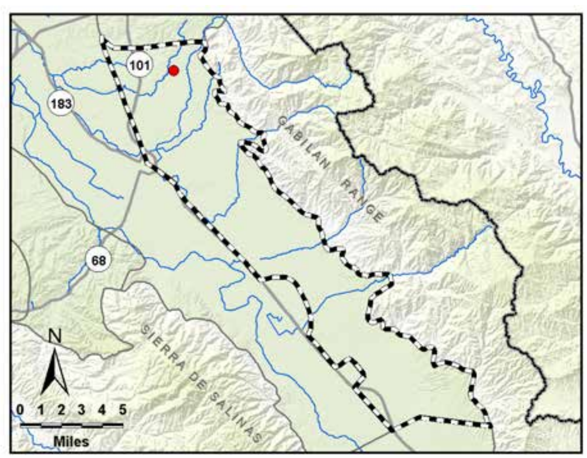


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (169 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



Perforated interval unknown

Well bottom
-499 feet msl

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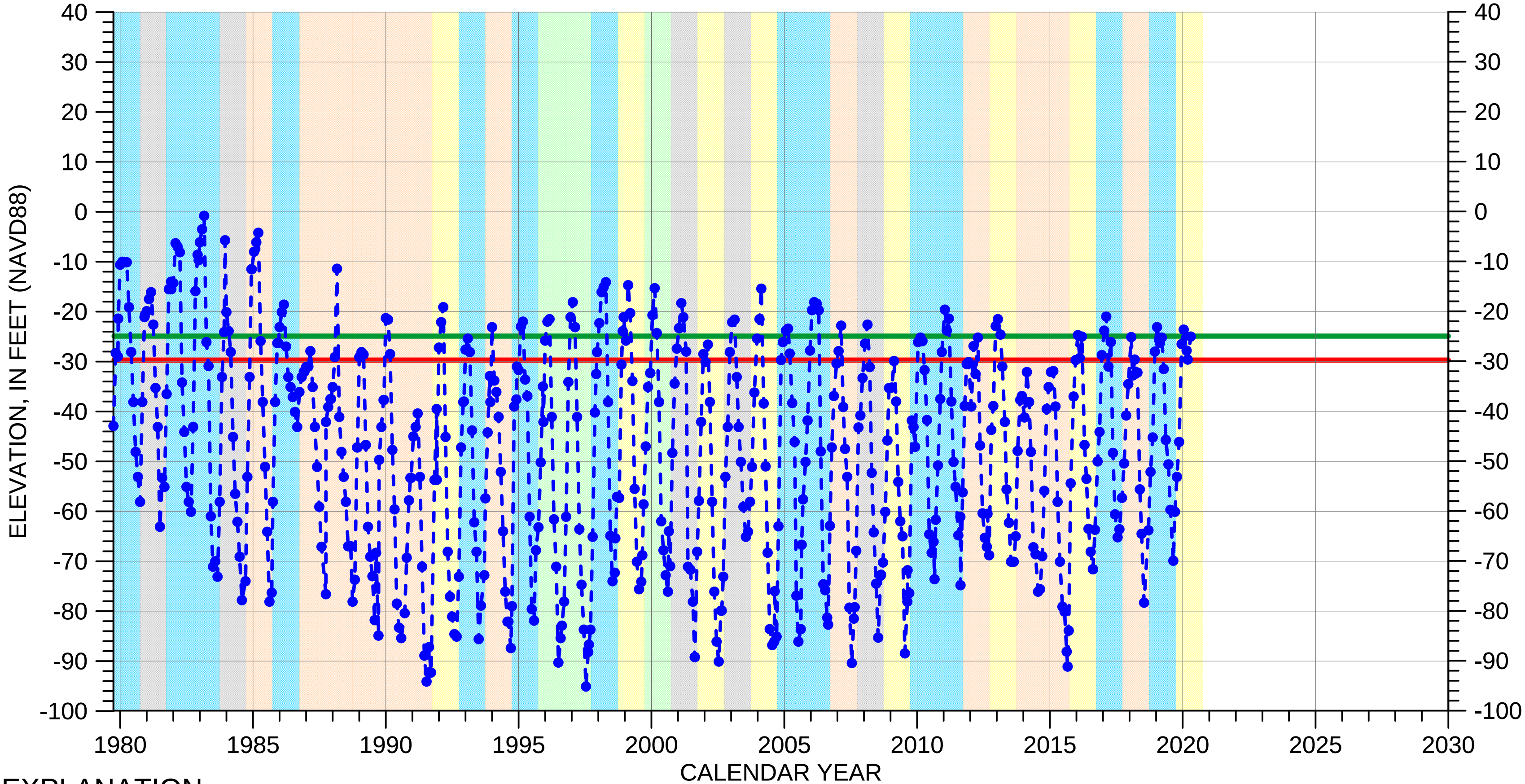
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-06R01

Eastside Aquifer Subbasin



Perforated interval unknown

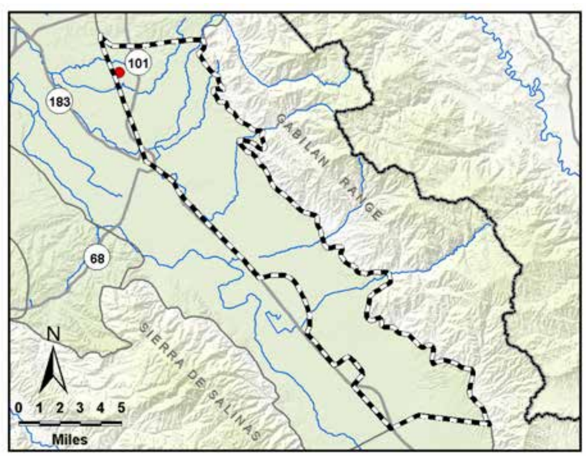
Well bottom
-293 feet msl

EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (92 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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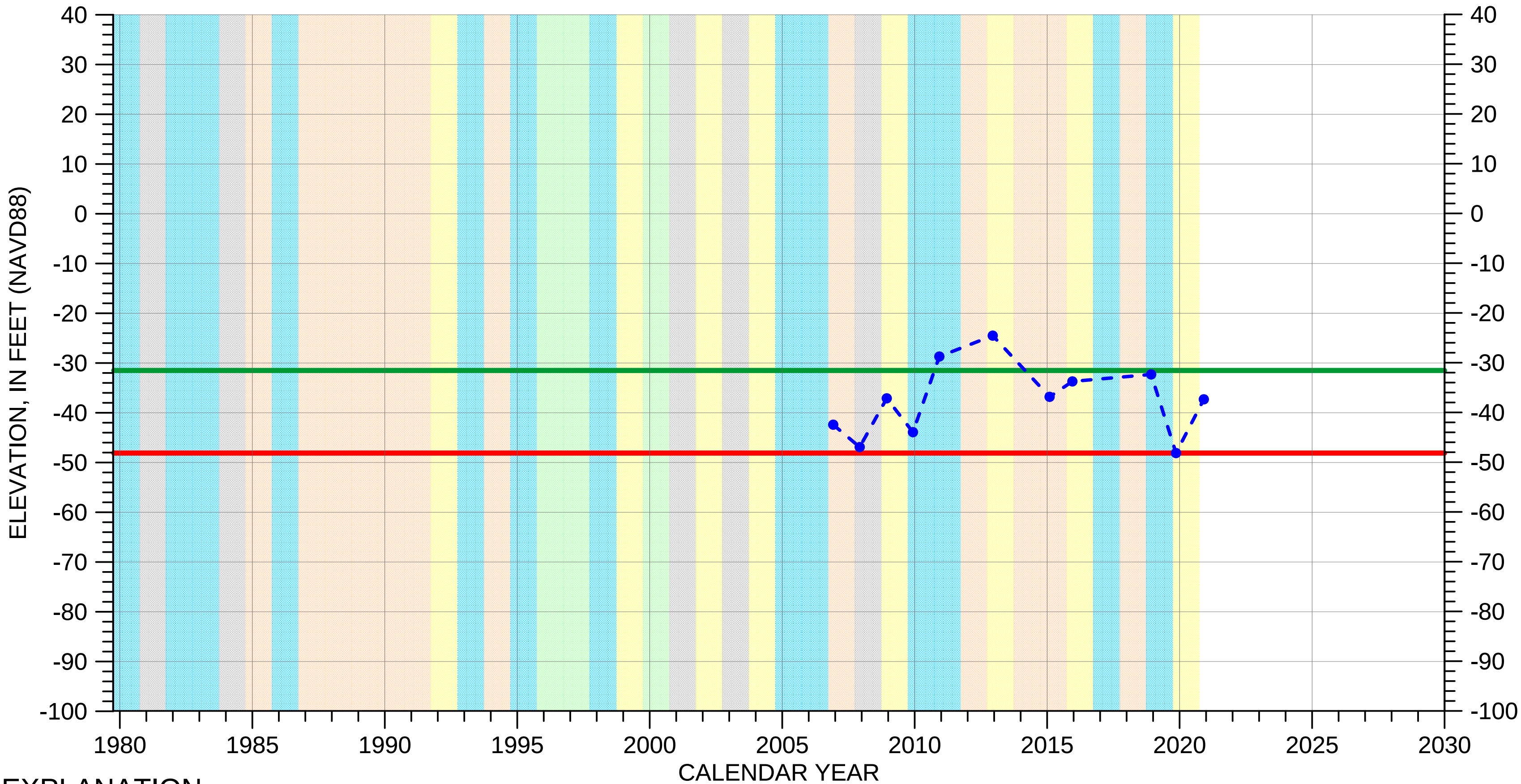
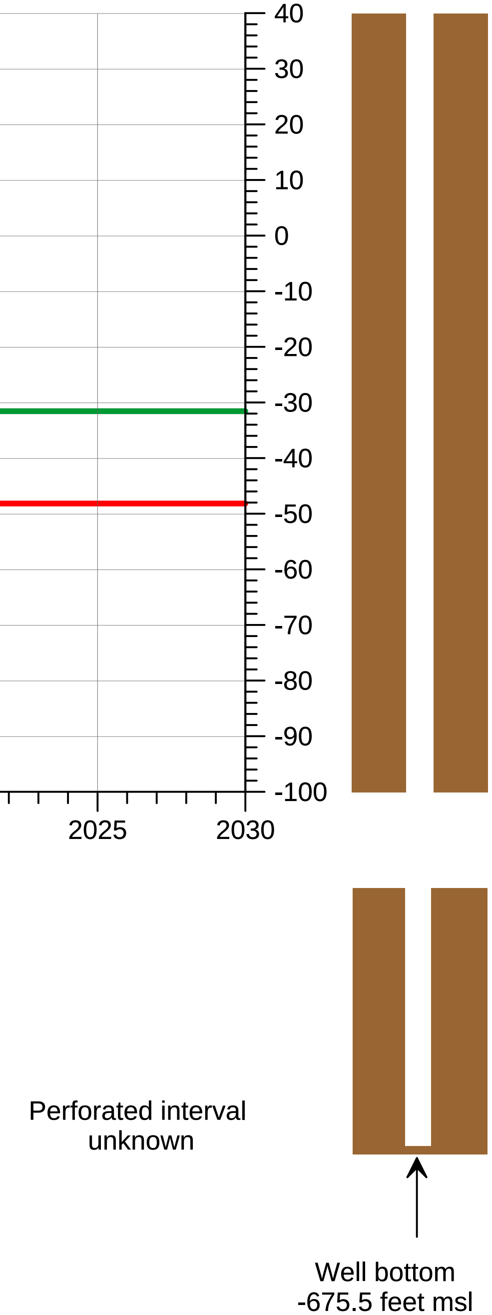
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-08C01

Eastside Aquifer Subbasin





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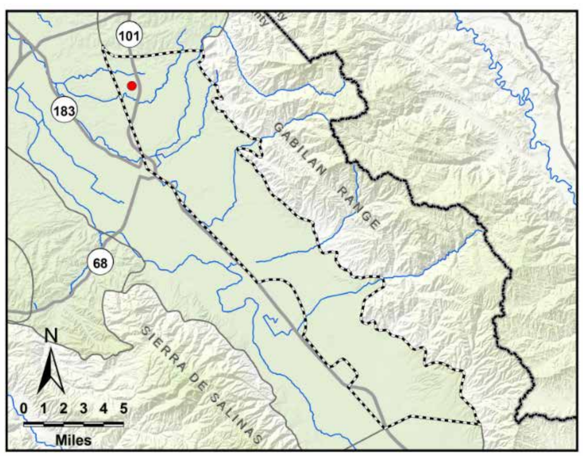
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (110 FT MSL)
- Measurable Objective
- Minimum Threshold

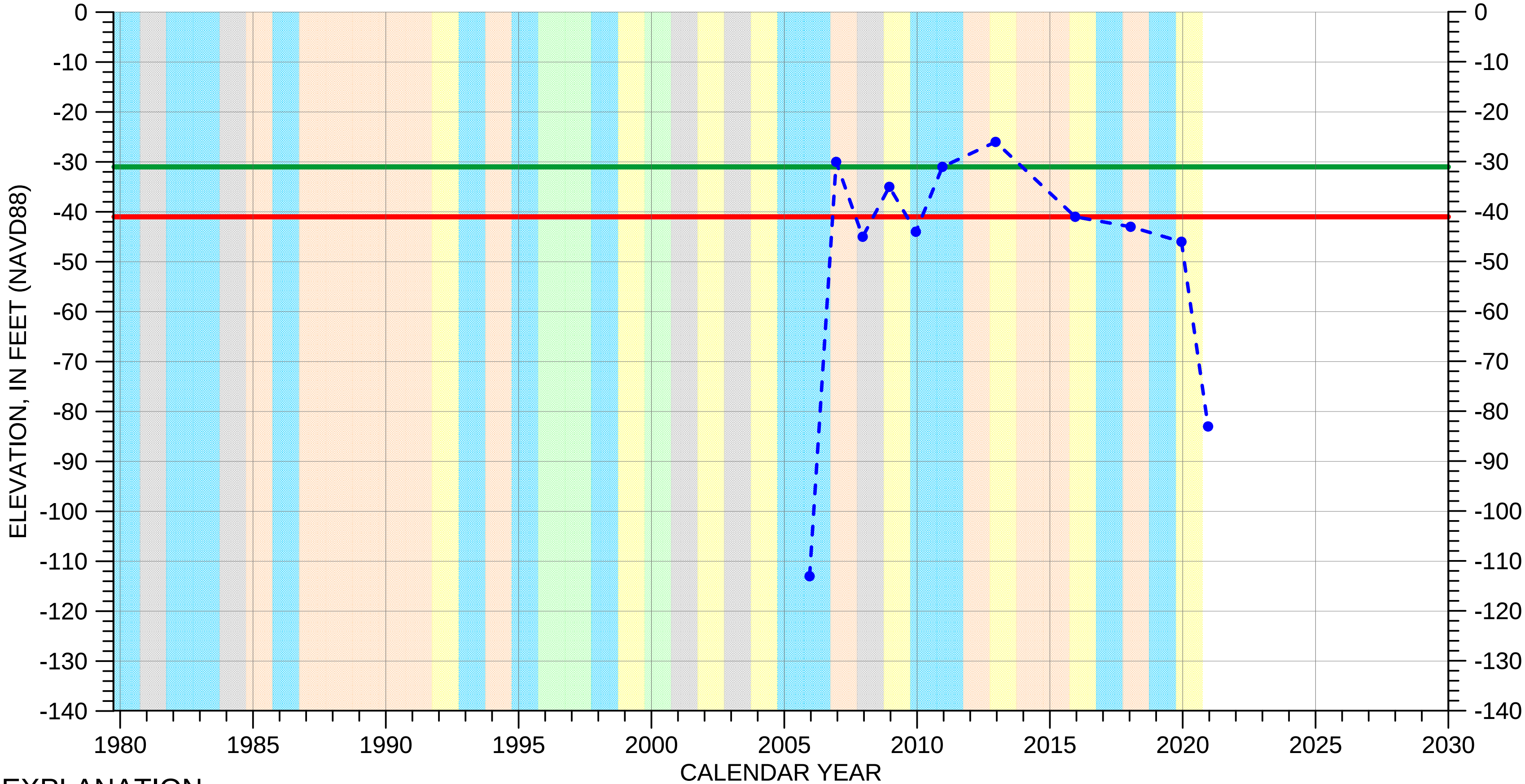
WATER YEAR TYPE DESIGNATION

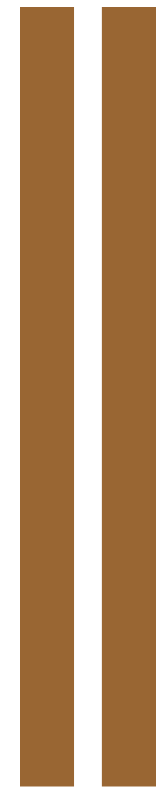
- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-08Q03

Eastside Aquifer Subbasin



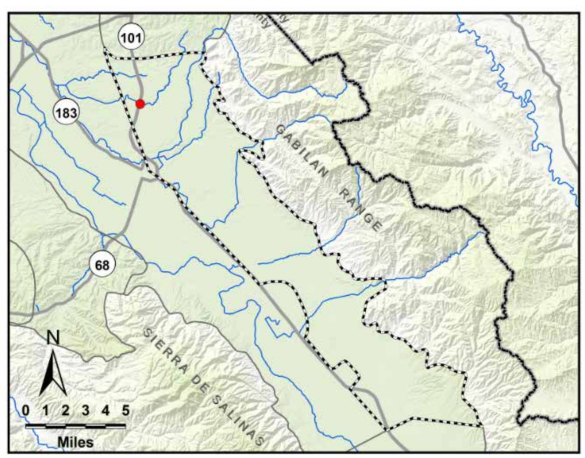


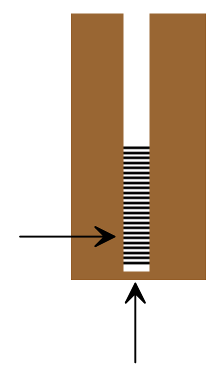
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (75 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





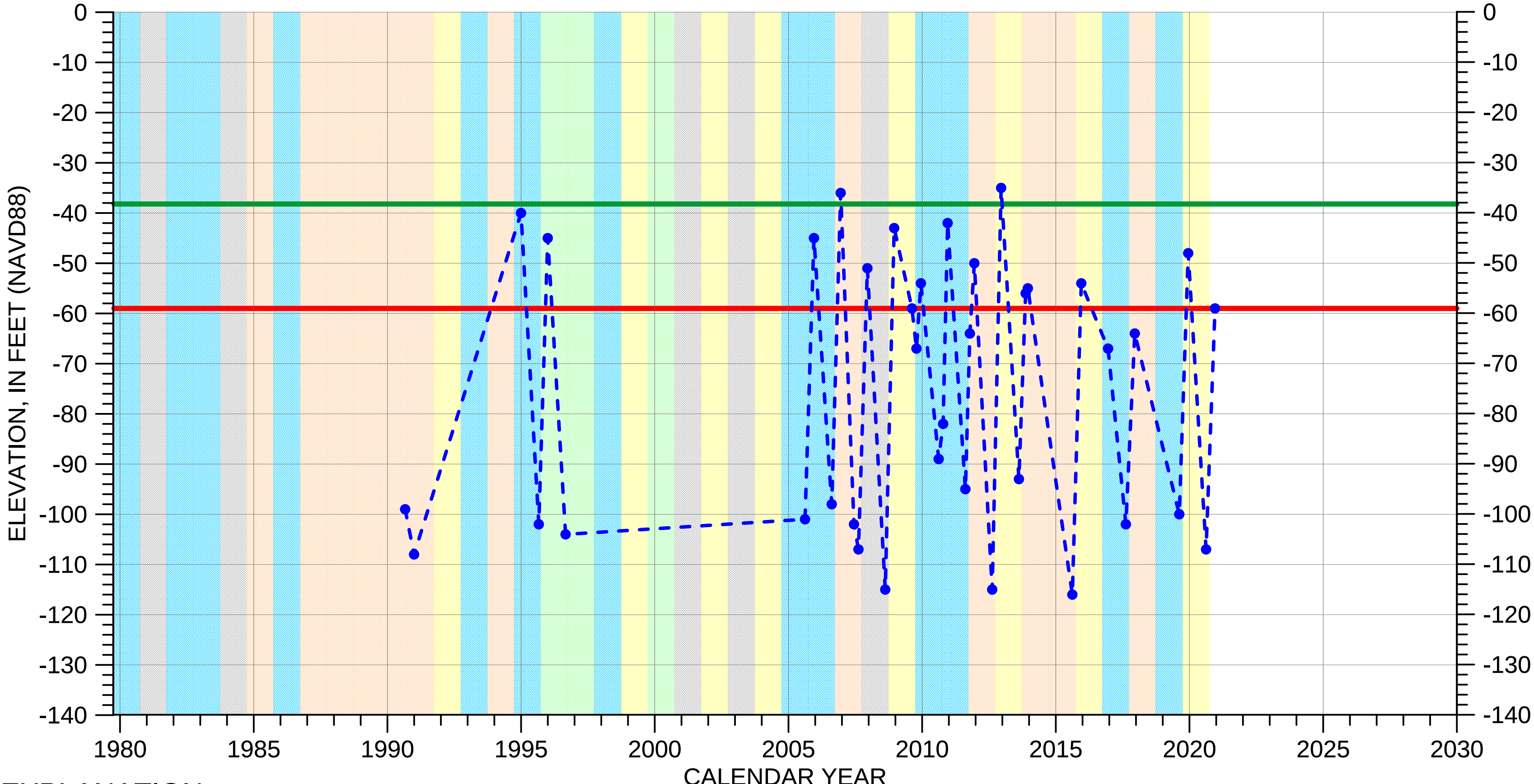
Perforated from
-245 to -605 feel msl

Well bottom
-731 feet msl

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Old ISP\Chapter_5\Hydrographs\GRFs_Ch8\14S_03E-08Q03.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-09E02

Eastside Aquifer Subbasin

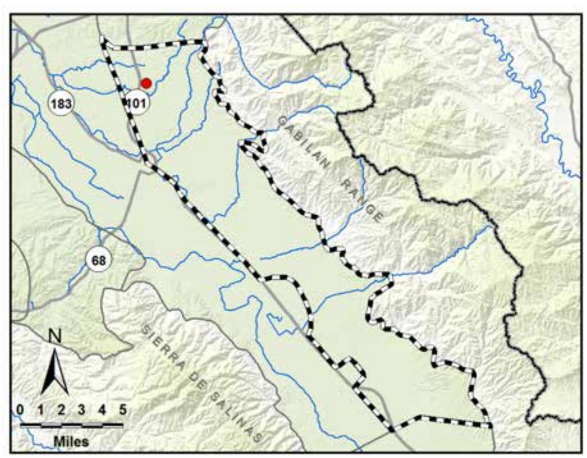


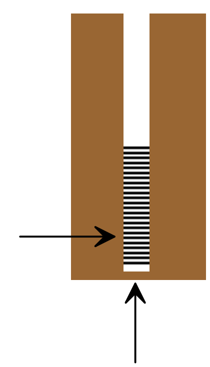
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (121 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





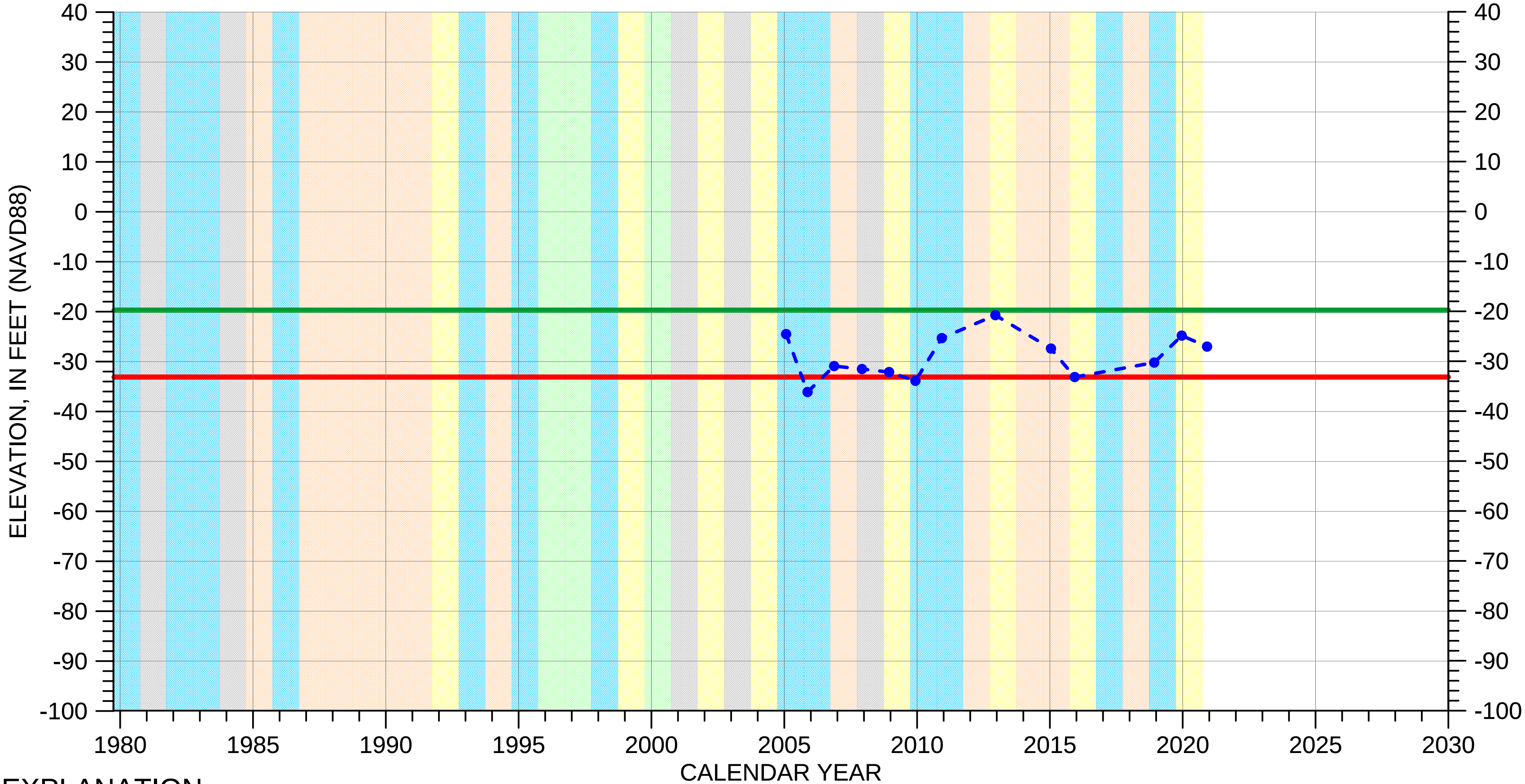
Perforated from
-189 to -509 feet msl

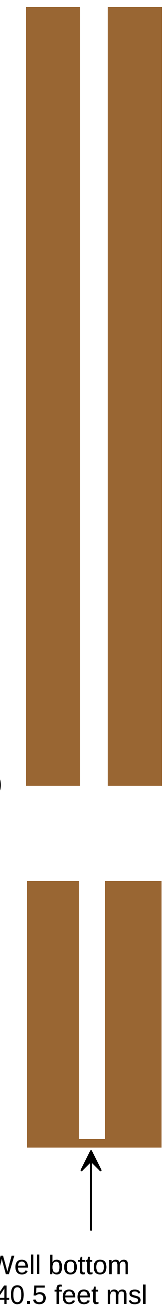
Well bottom
-529 feet msl

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Chapter_5\Hydrographs\GRFs\14S_03E-09E02.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-09P02

Eastside Aquifer Subbasin



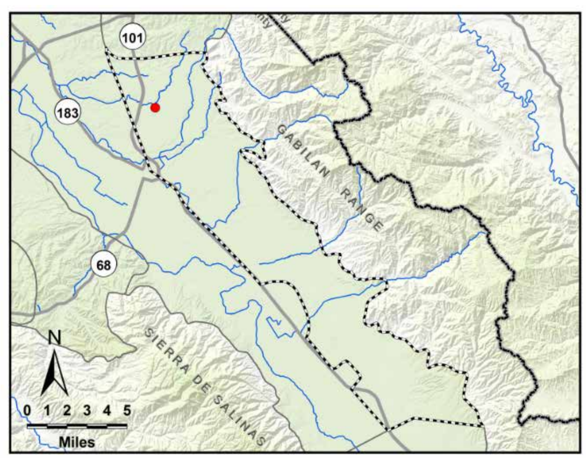


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (115 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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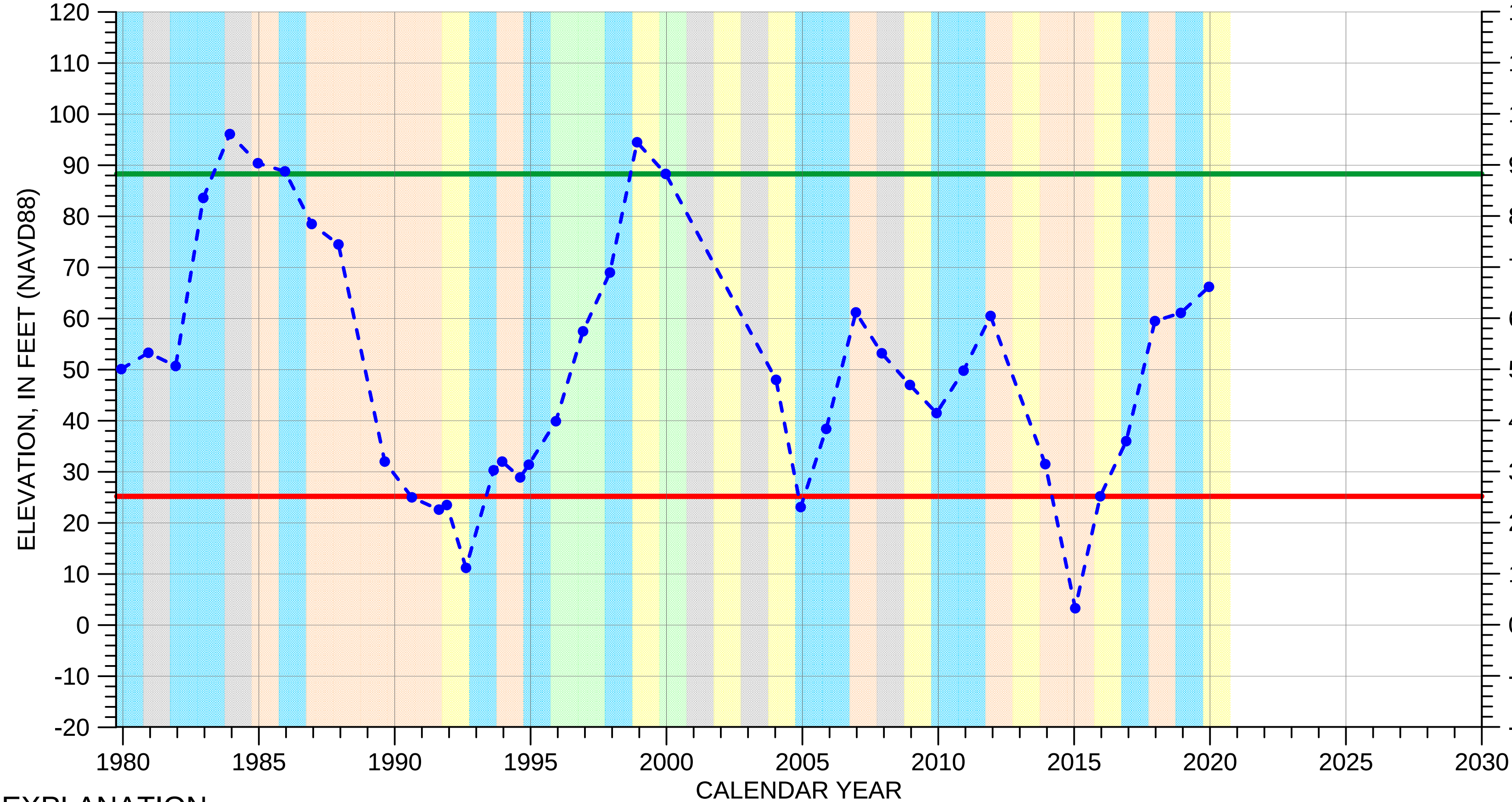
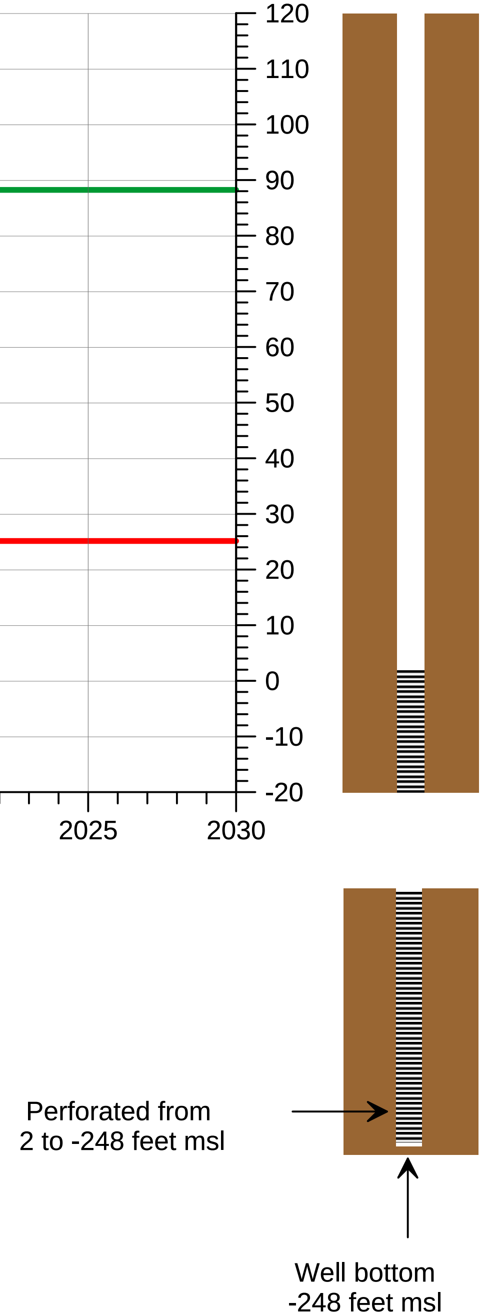
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-11H01

Eastside Aquifer Subbasin



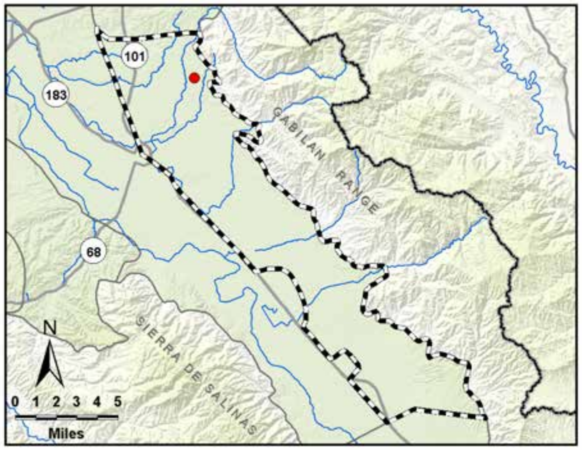


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (142 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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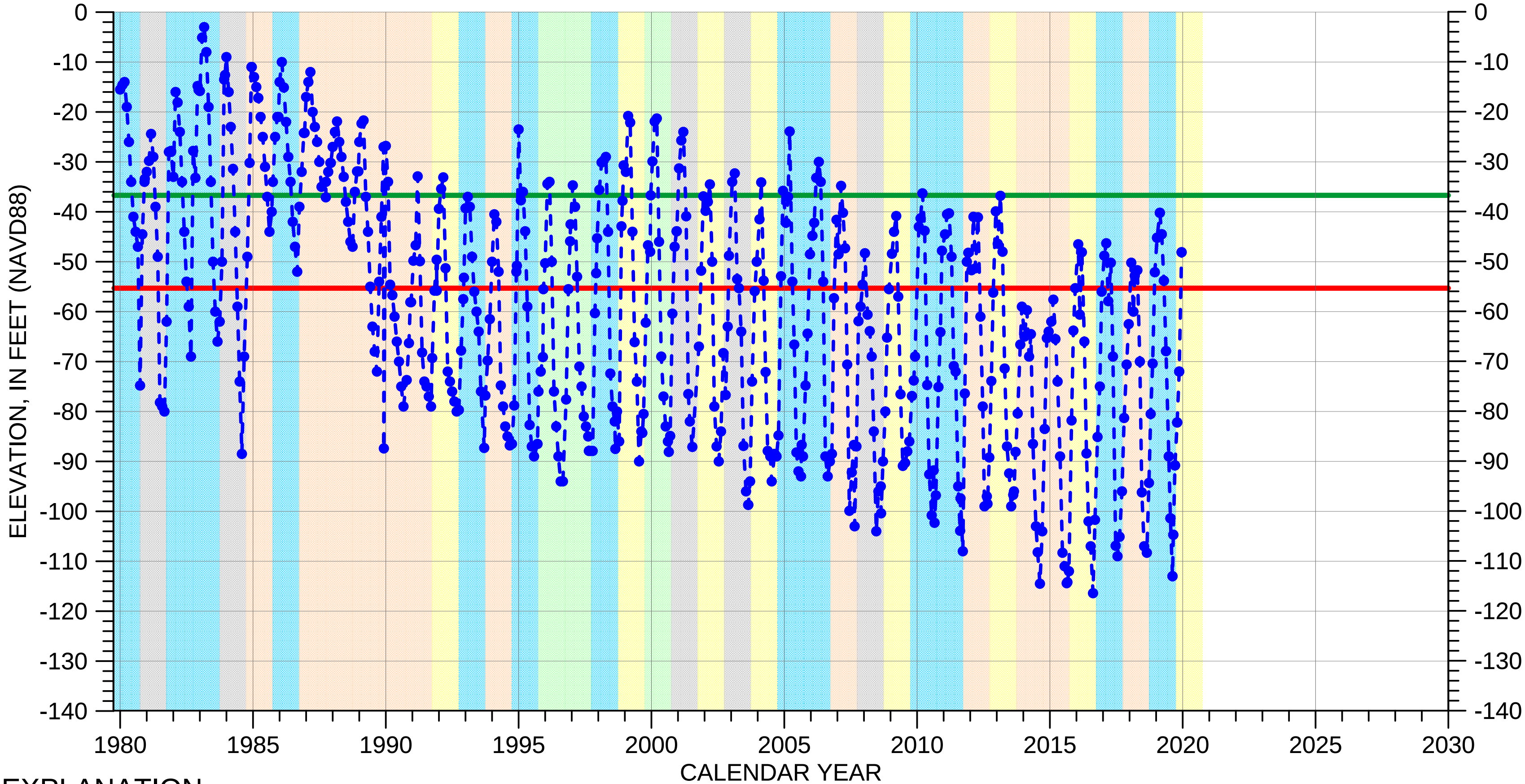
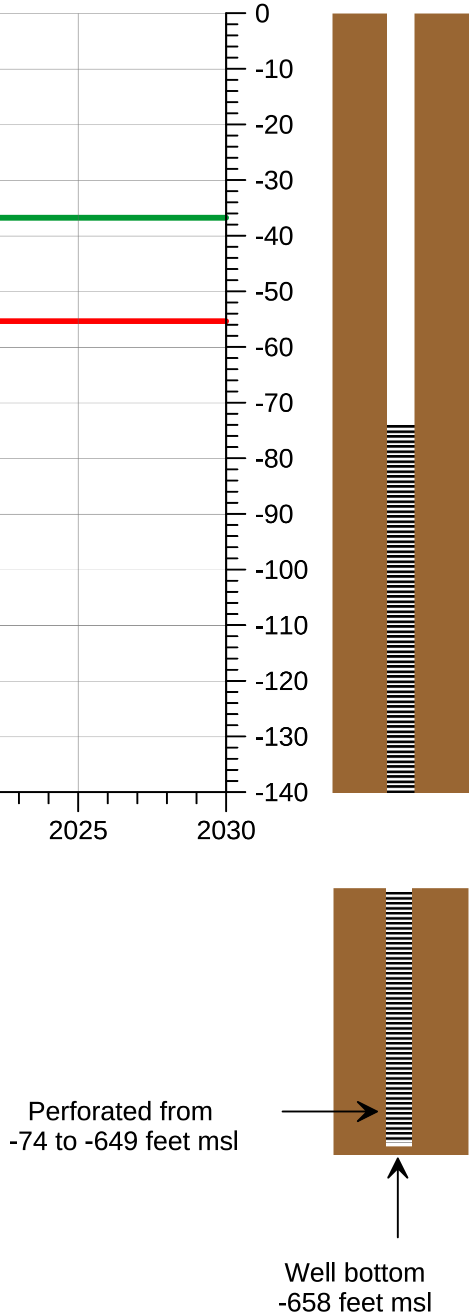
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-15H03

Eastside Aquifer Subbasin



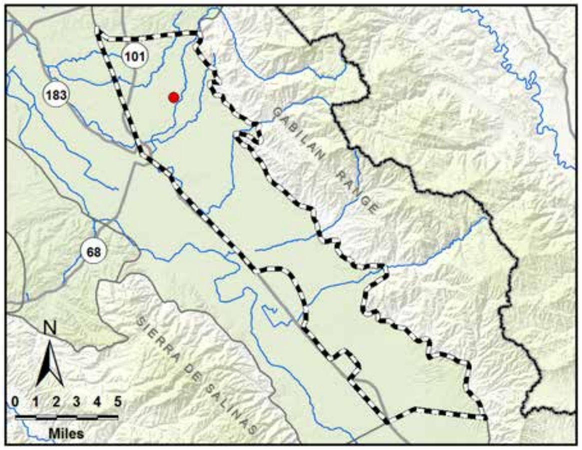


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (126 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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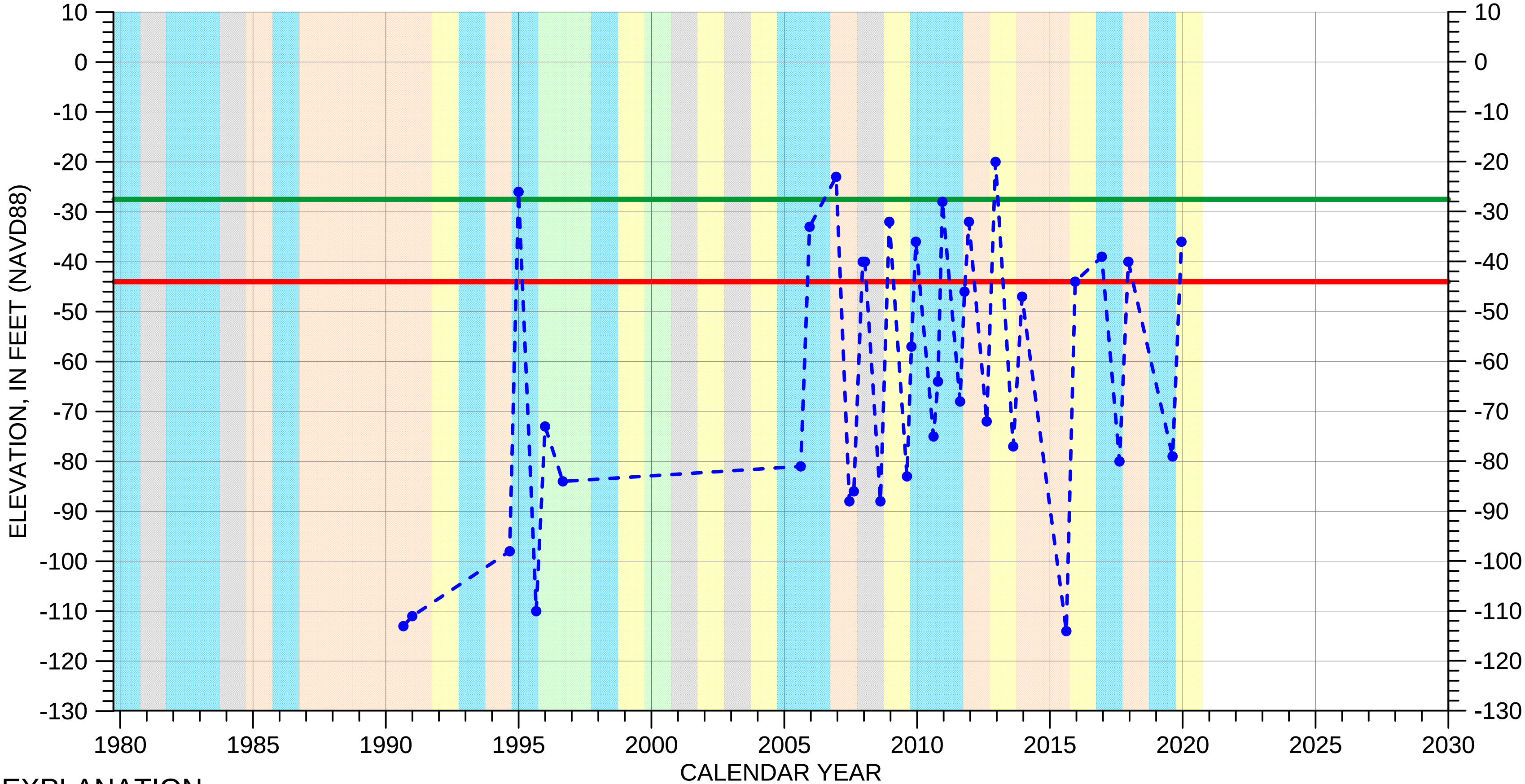
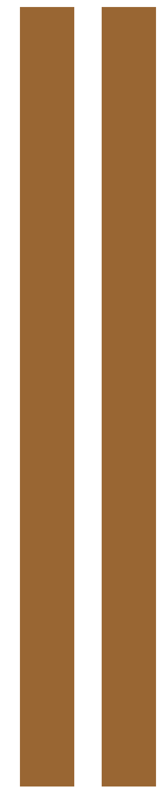
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-17F01

Eastside Aquifer Subbasin



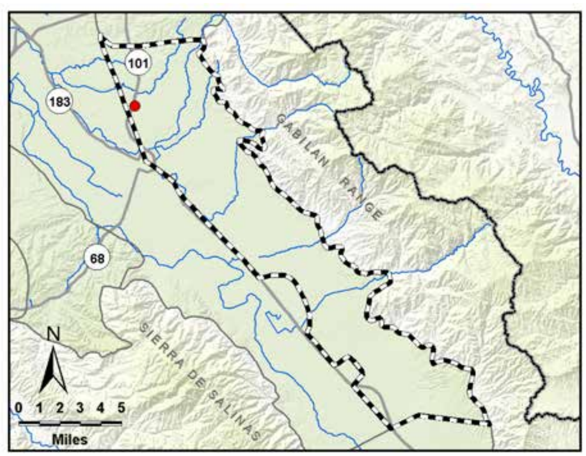


EXPLANATION

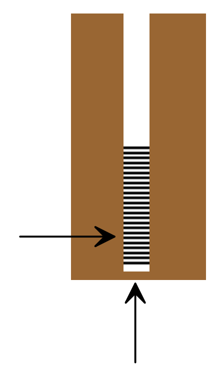
- Groundwater Elevation
- Suspect Measurement
- Land Surface (92 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



Perforated from -306 to -508 feet msl



Well bottom -528 feet msl

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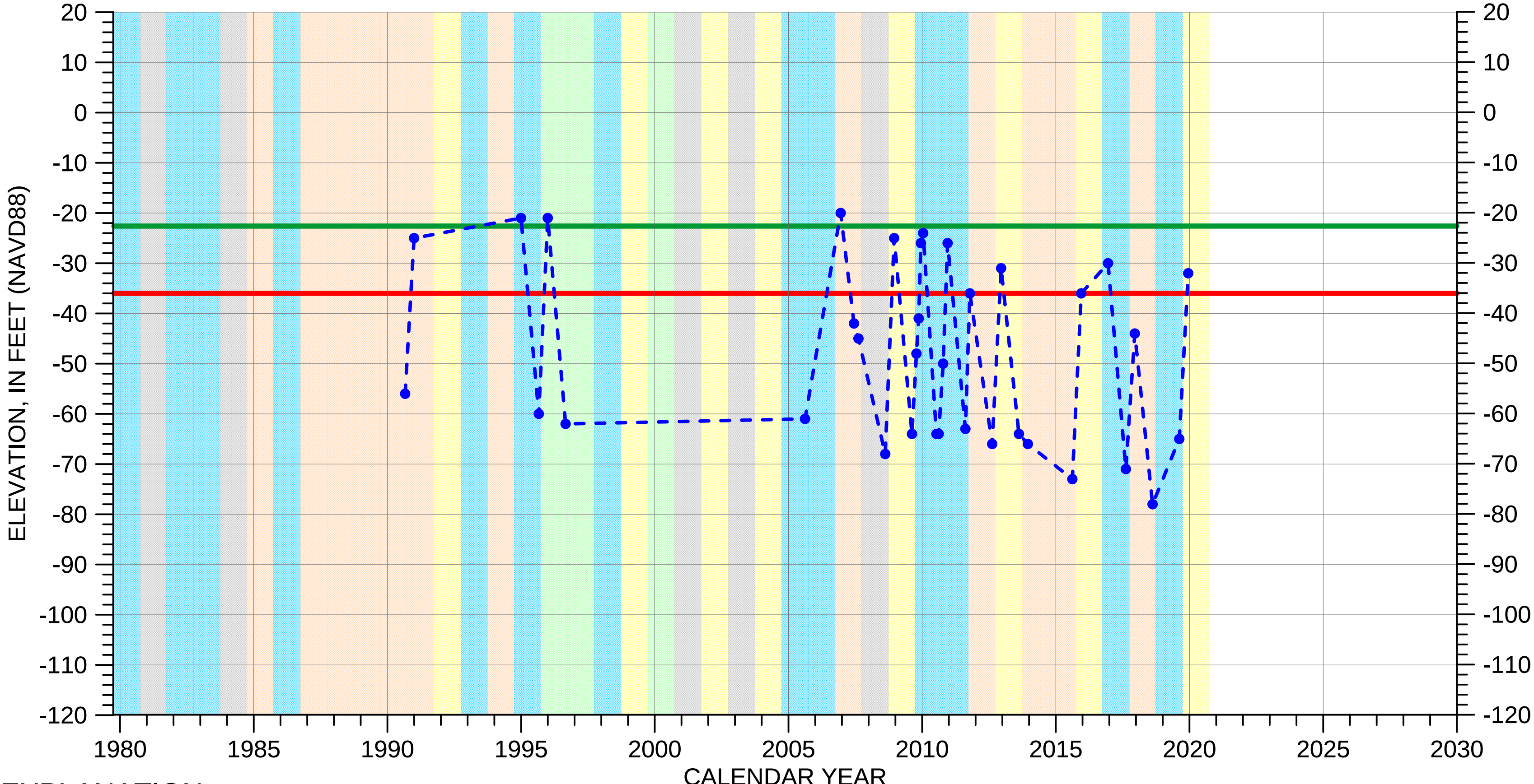
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-21L01

Eastside Aquifer Subbasin

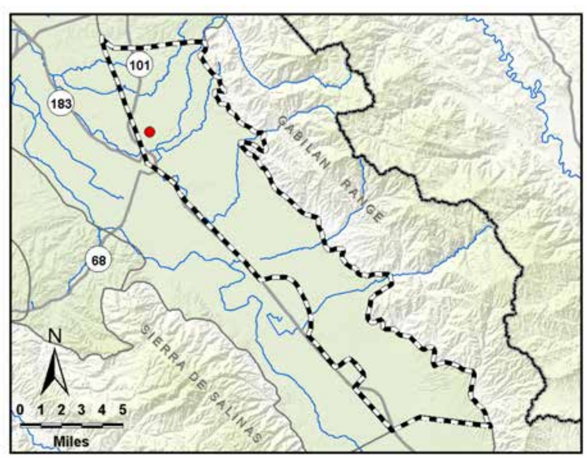


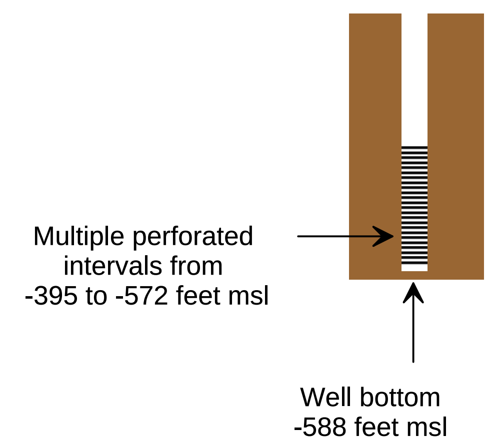
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (80 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





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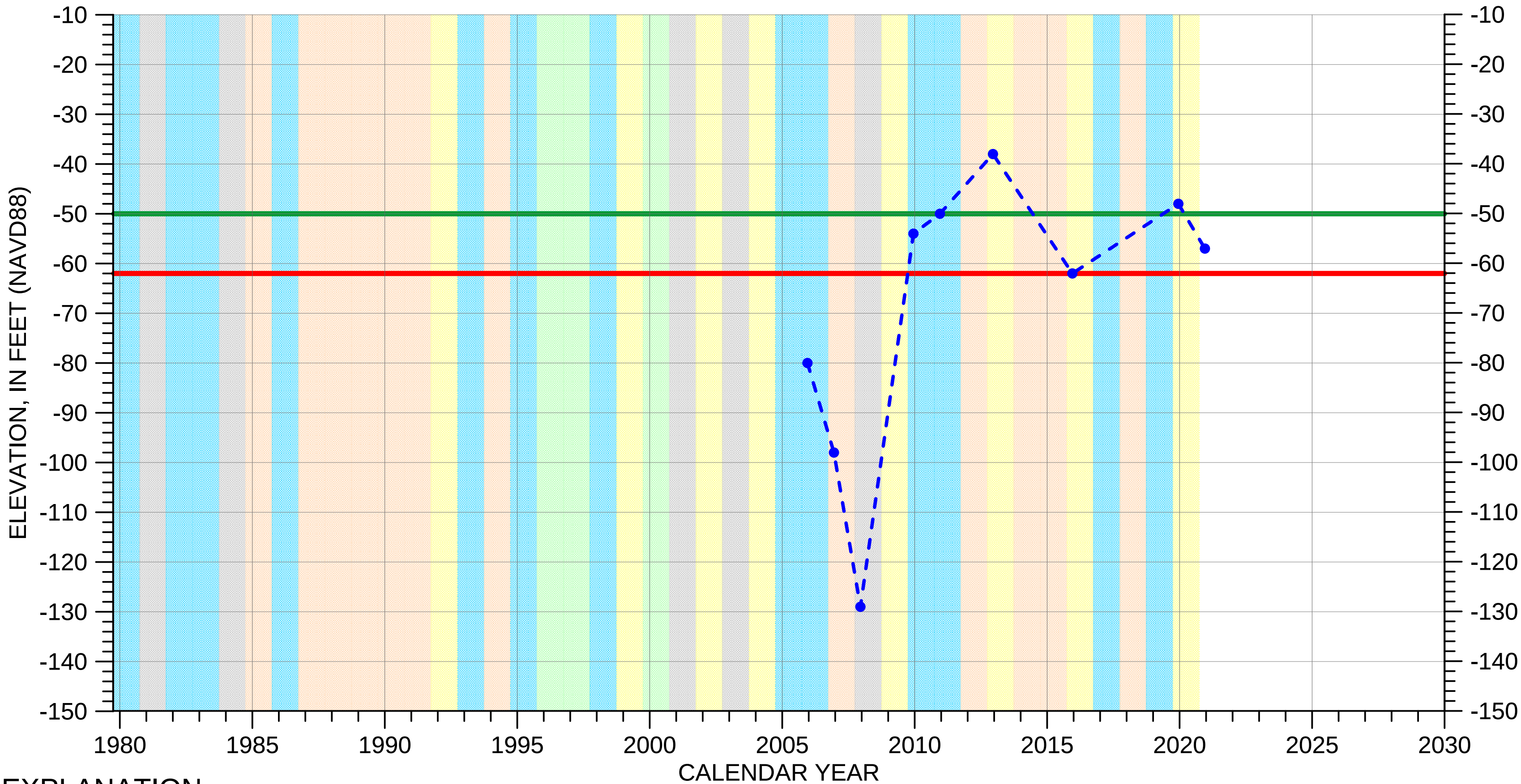
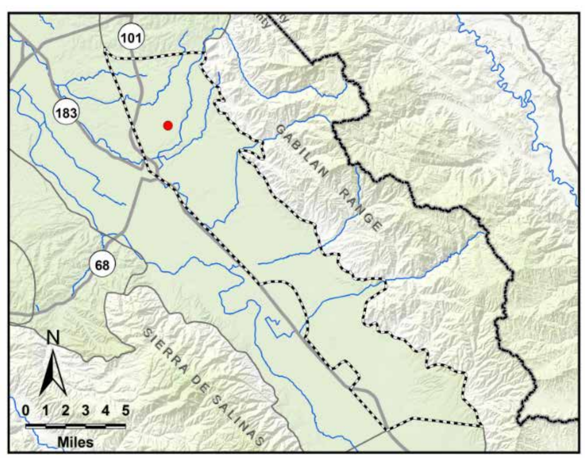
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-22D01

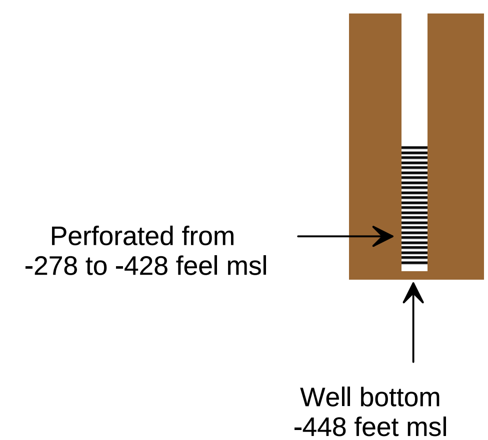
Eastside Aquifer Subbasin



EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (102 FT MSL)
- Measurable Objective
- Minimum Threshold





WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

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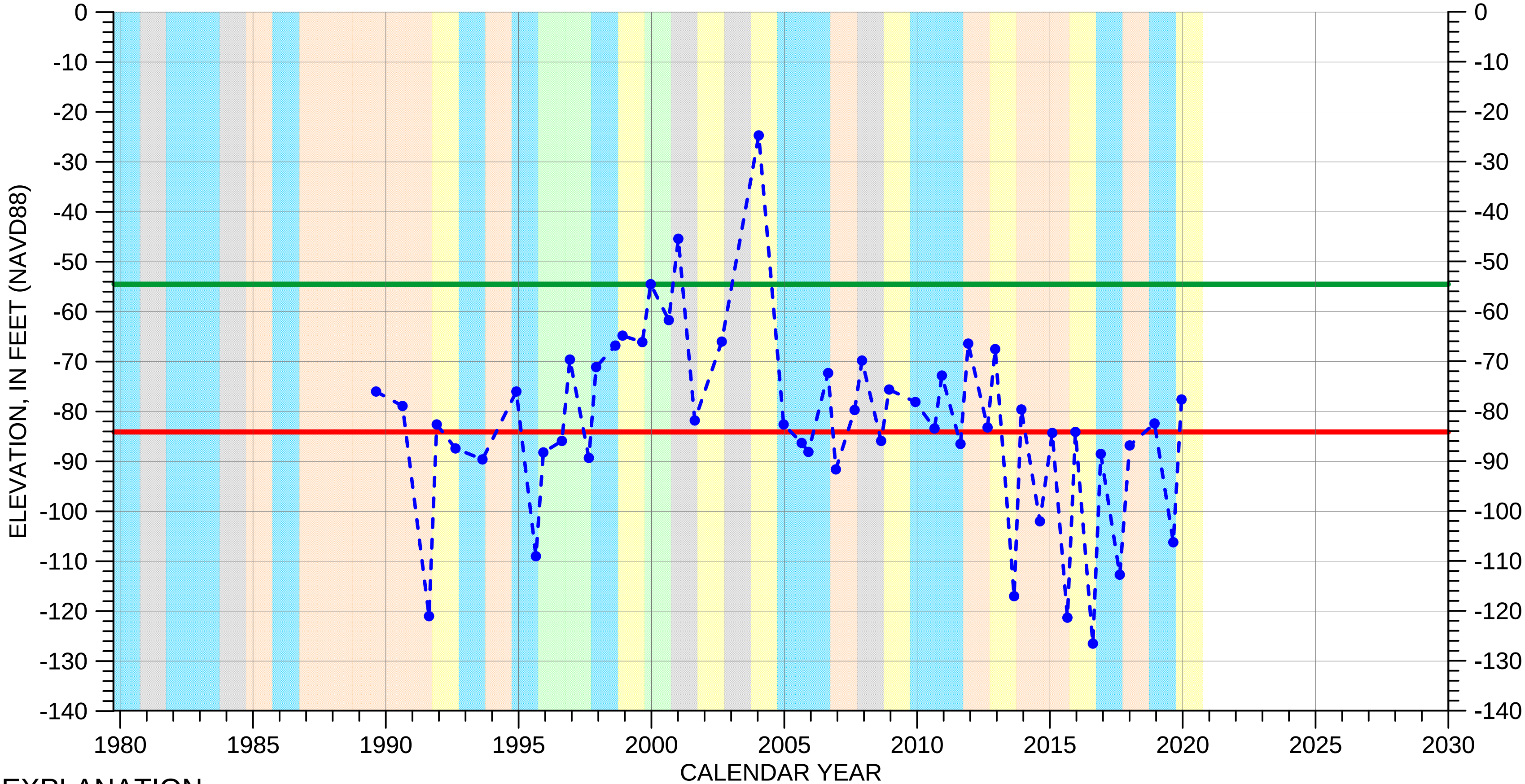
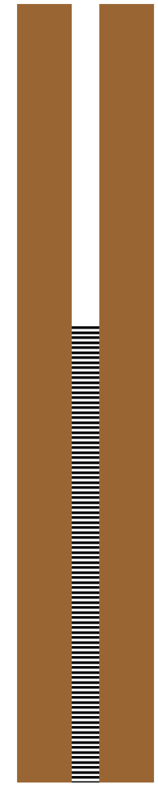
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-24H01

Eastside Aquifer Subbasin



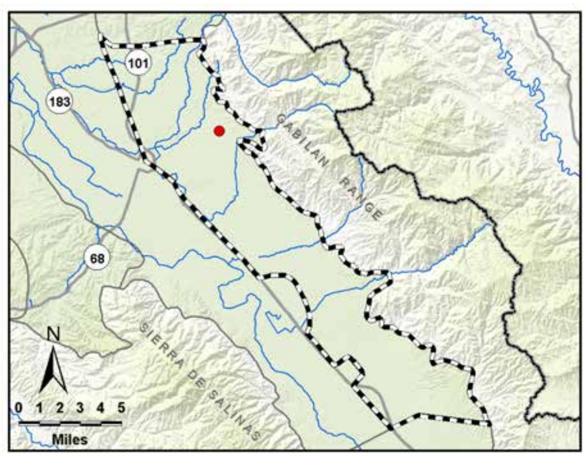


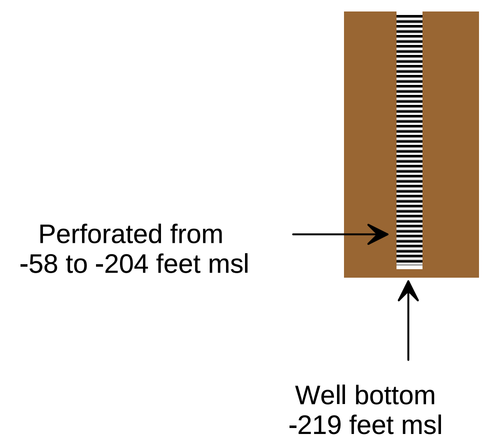
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (156 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

DRY
DRY - NORMAL
NORMAL
WET - NORMAL
WET





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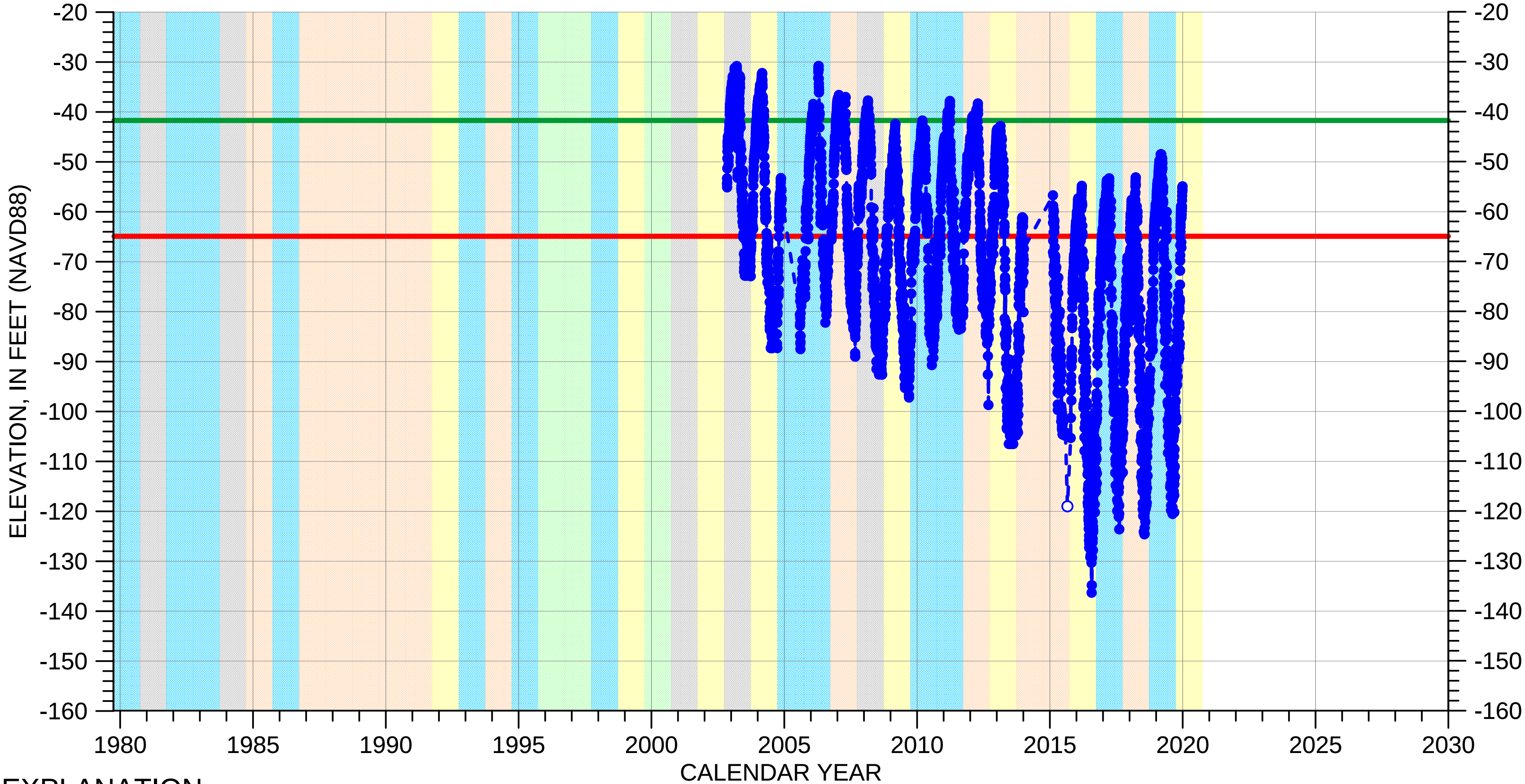
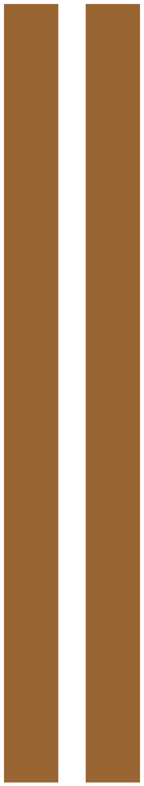
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-25C01

Eastside Aquifer Subbasin





EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (141 FT MSL)

Measurable Objective

Minimum Threshold

WATER YEAR TYPE DESIGNATION

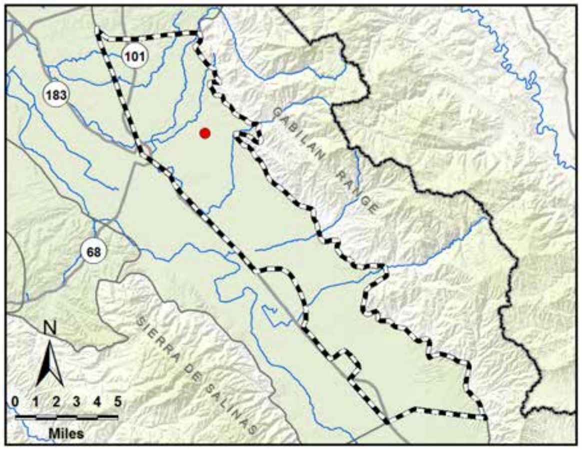
DRY

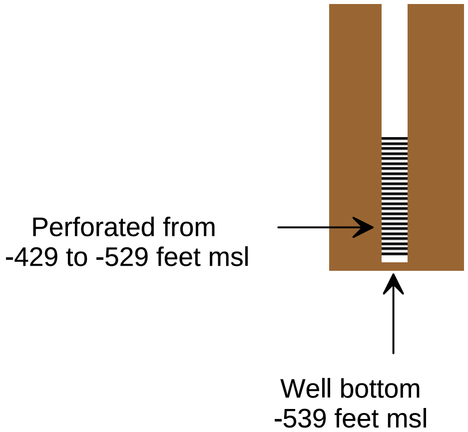
DRY - NORMAL

NORMAL

WET - NORMAL

WET





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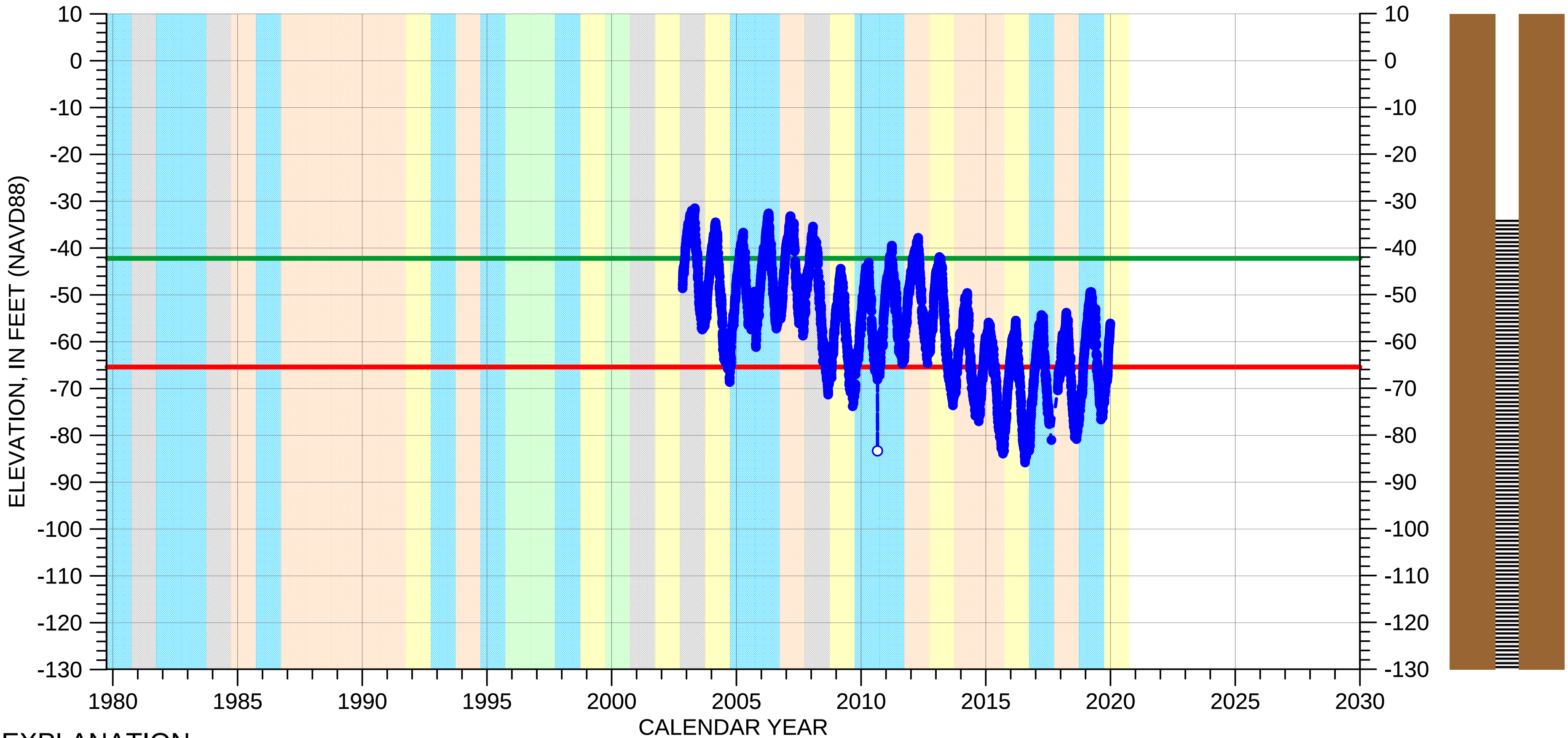
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-25C02

Eastside Aquifer Subbasin

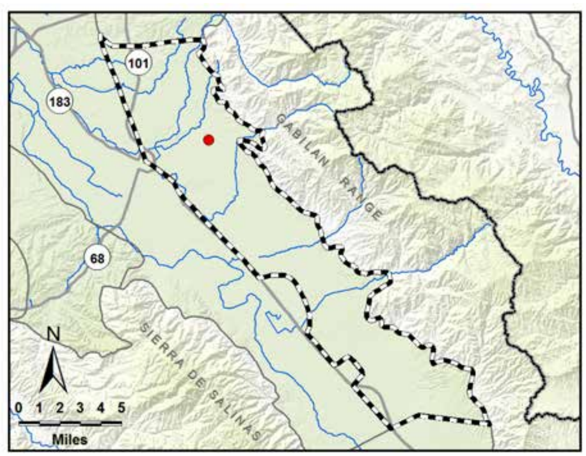


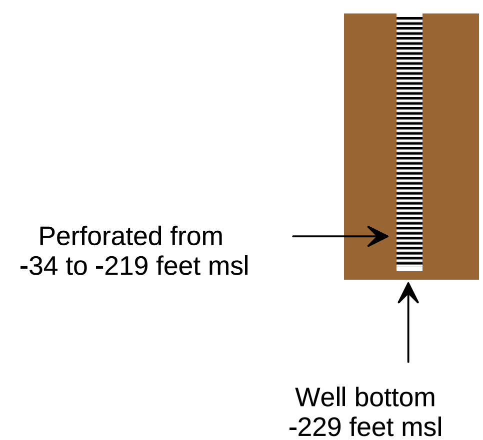
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (141 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





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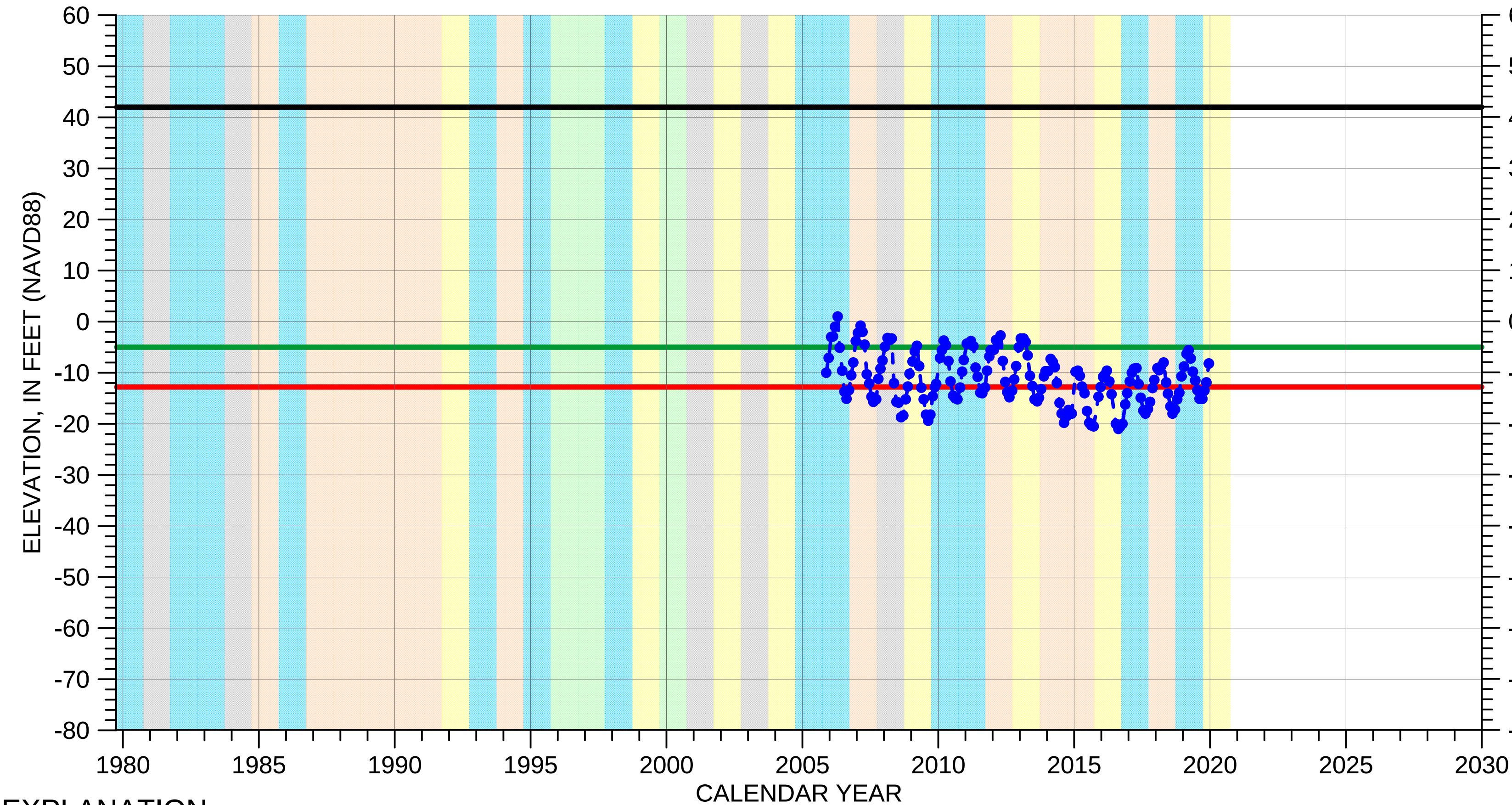
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-27B01

Eastside Aquifer Subbasin

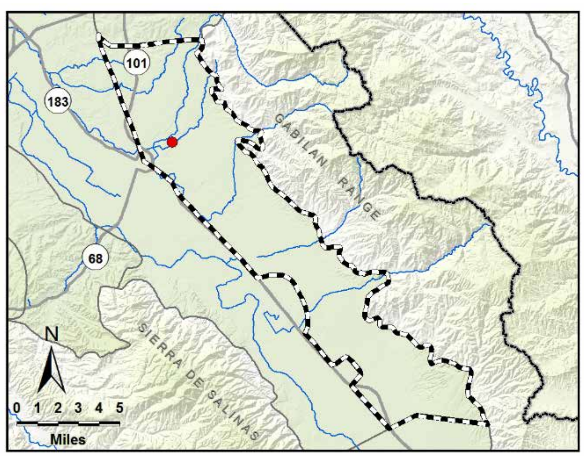


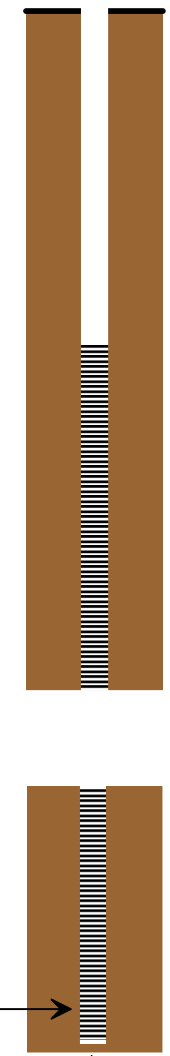
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





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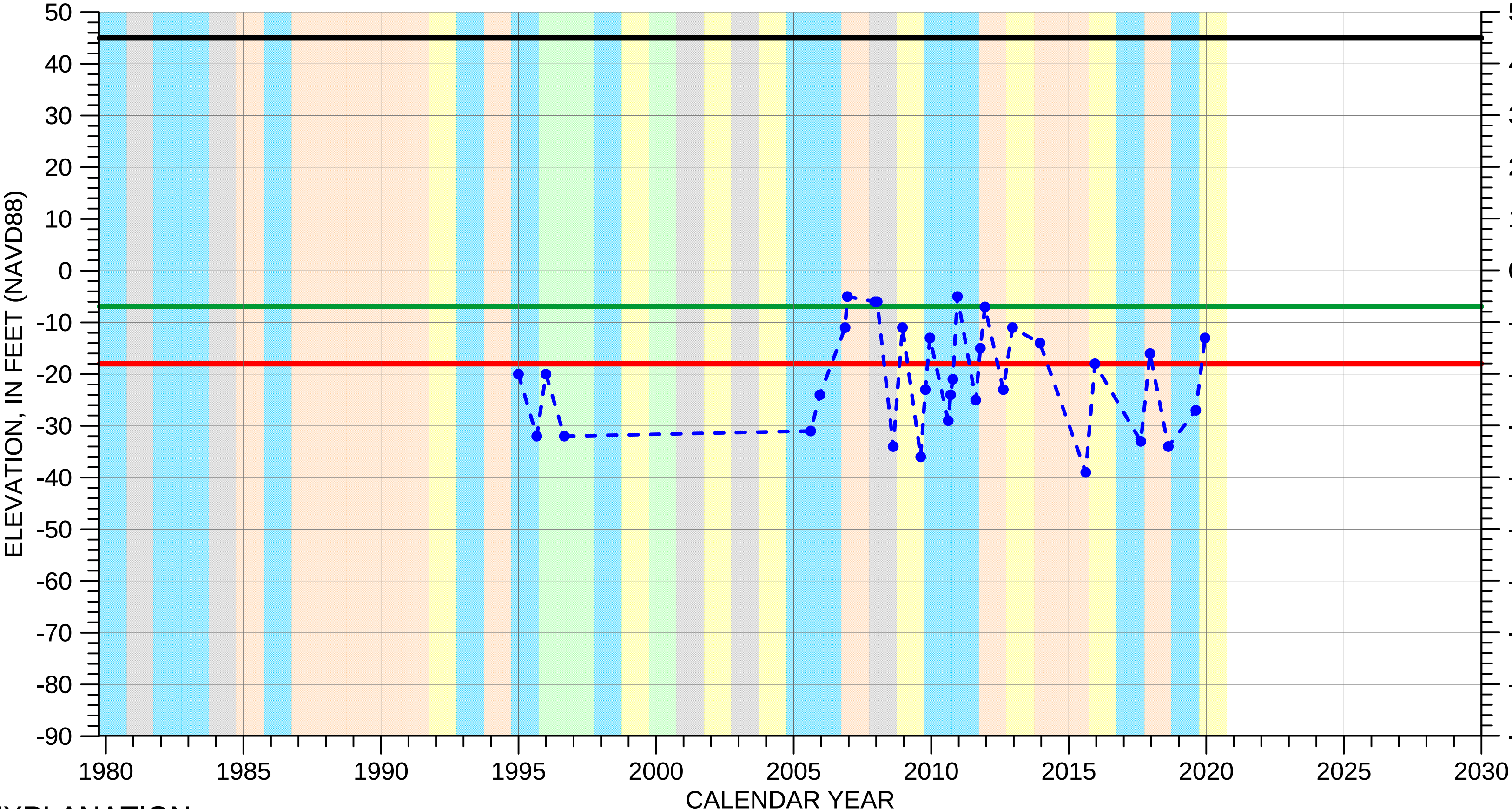
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-33G01

Eastside Aquifer Subbasin



EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface

Measurable Objective

Minimum Threshold

WATER YEAR TYPE DESIGNATION

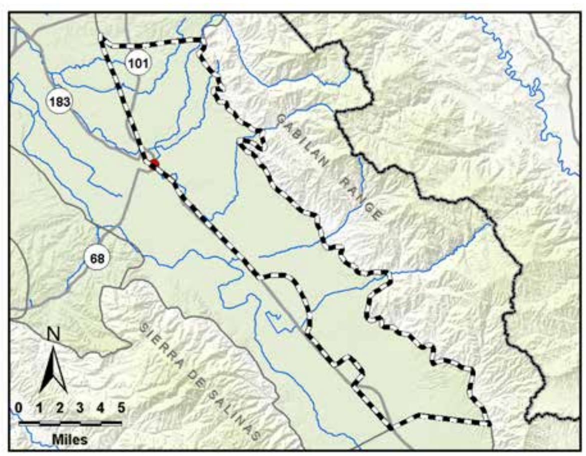
DRY

DRY - NORMAL

NORMAL

WET - NORMAL

WET



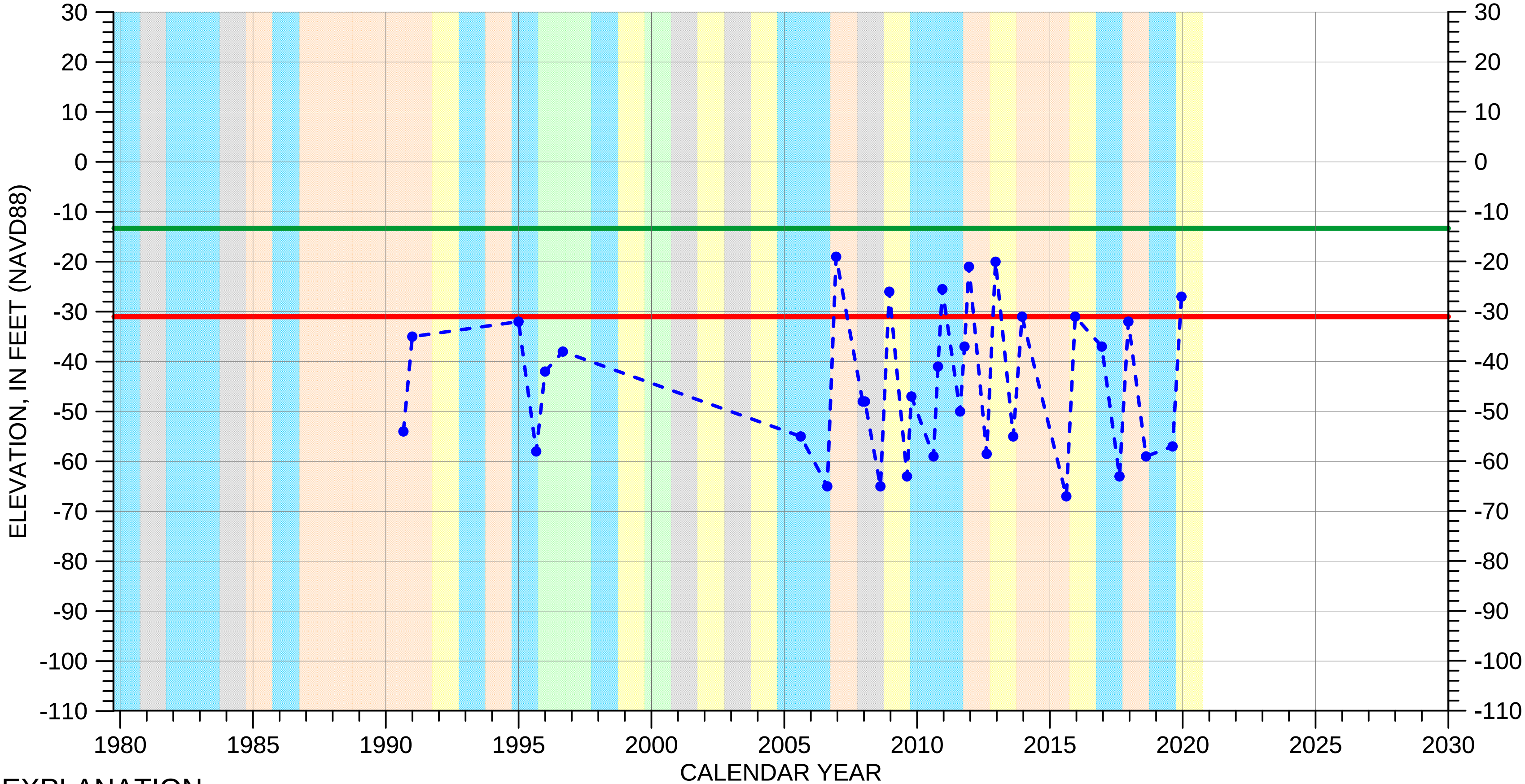
Perforated from
-72 to -286 feet msl

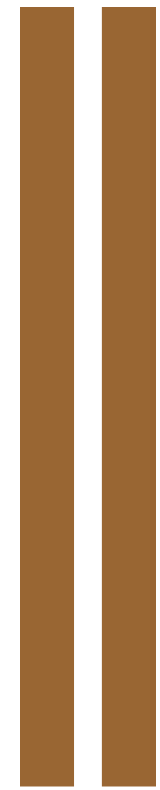
Well bottom
-286 feet msl

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Chapter_5\Hydrographs\GRFs\14S_03E-33G01.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-34C01

Eastside Aquifer Subbasin



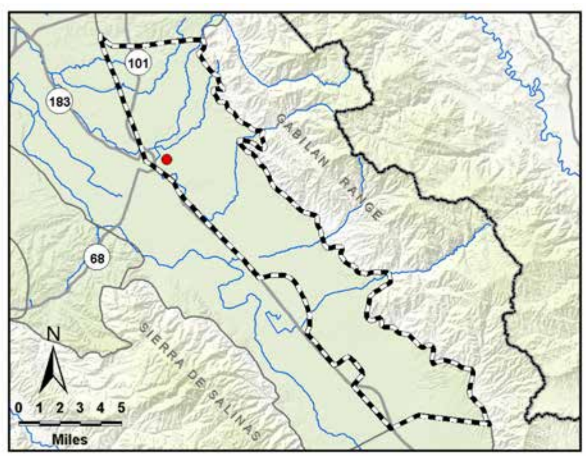


EXPLANATION

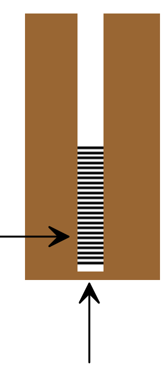
- Groundwater Elevation
- Suspect Measurement
- Land Surface (67 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



Perforated from
-238 to -493 feet msl

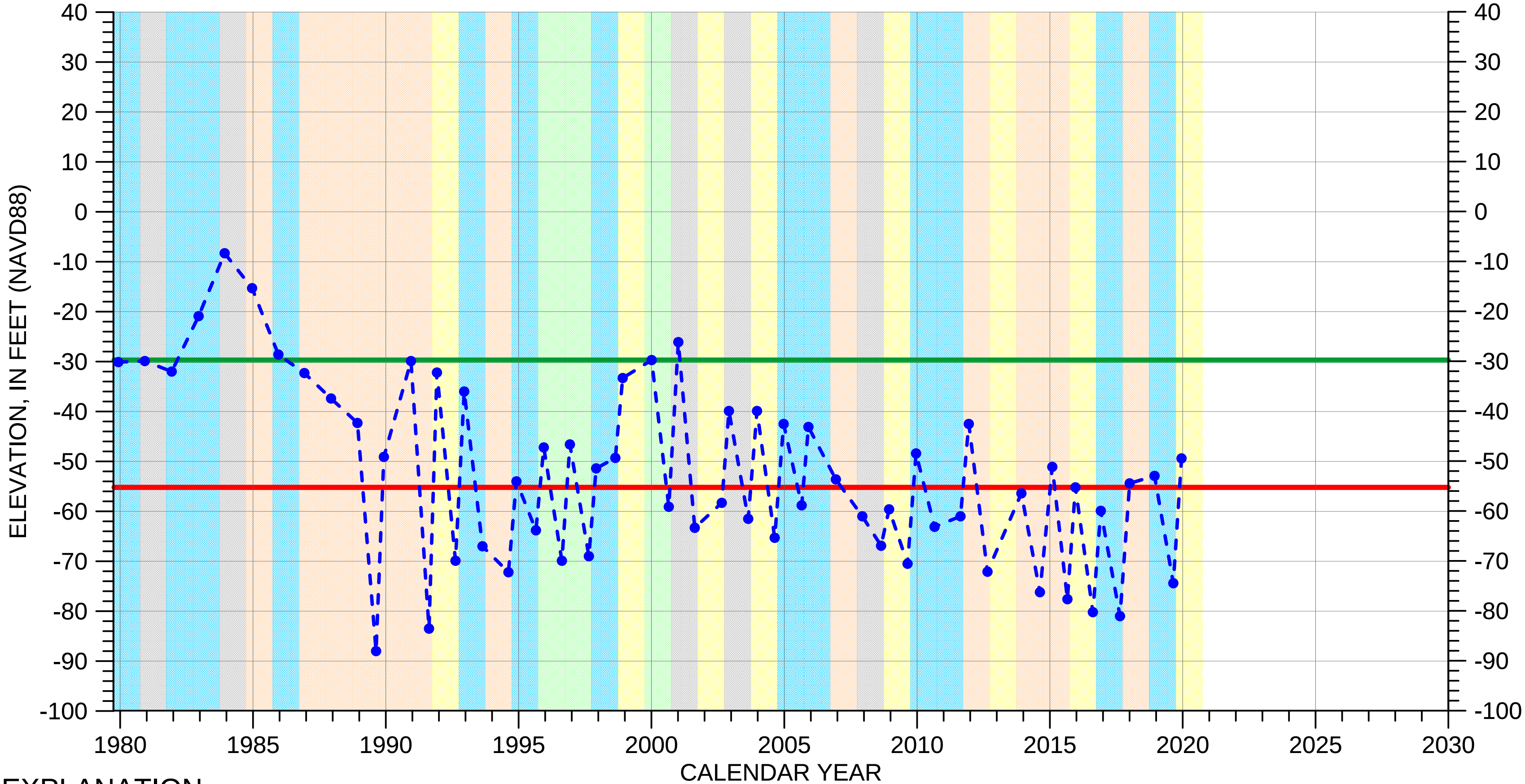


Well bottom
-513 feet msl

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Chapter_5\Hydrographs\GRFs\14S_03E-34C01.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/03E-36A01

Eastside Aquifer Subbasin

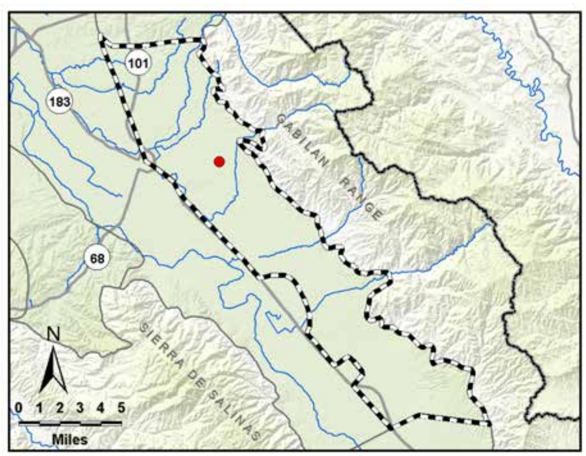


Perforated interval unknown

Well bottom
-350 feet msl

EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (140 FT MSL)
- Measurable Objective
- Minimum Threshold



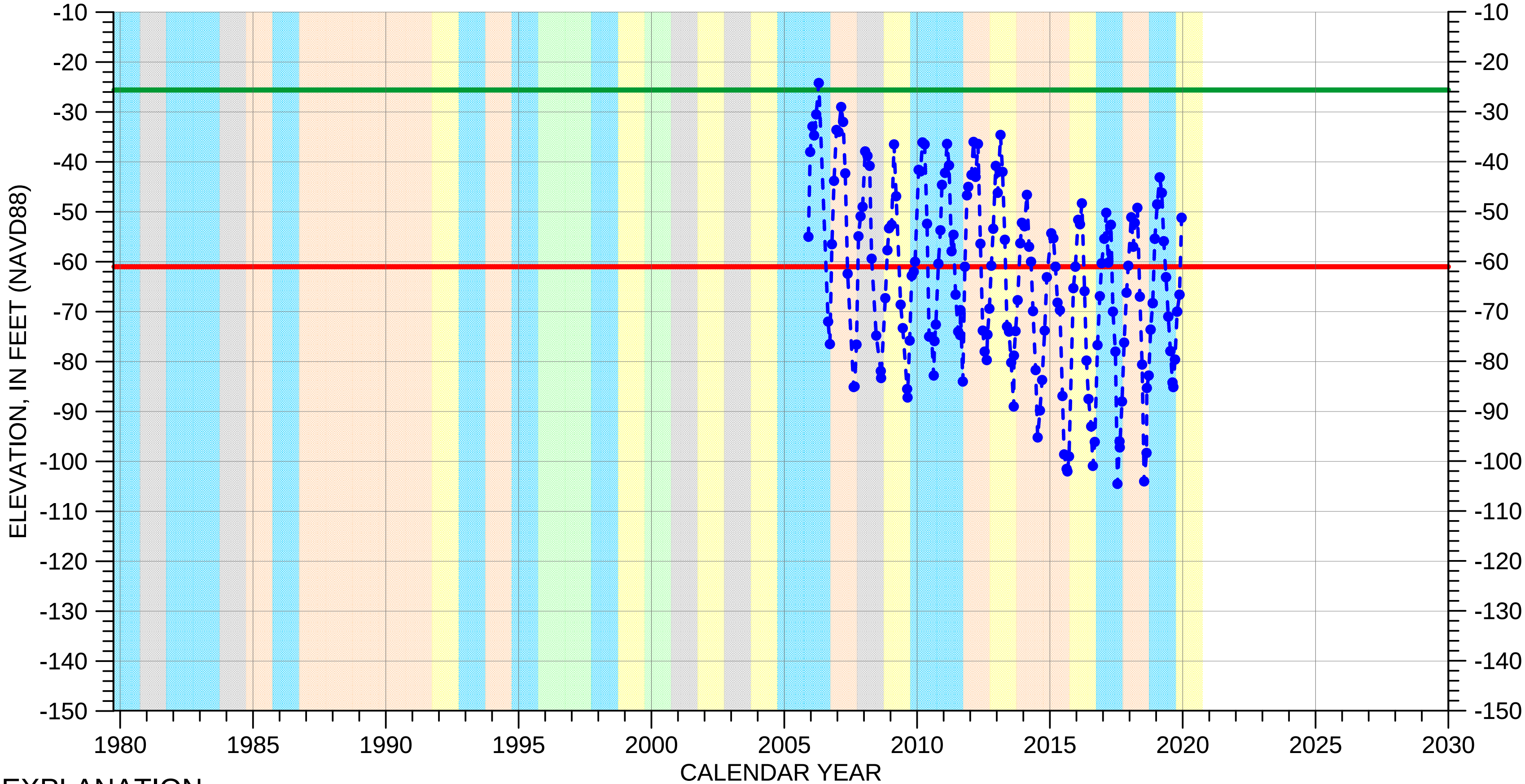
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Chapter_5\Hydrographs\GRFs\14S_03E-36A01.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 14S/04E-31Q02

Eastside Aquifer Subbasin

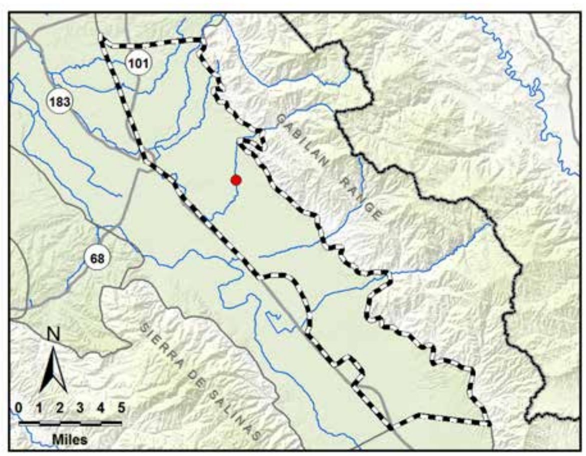


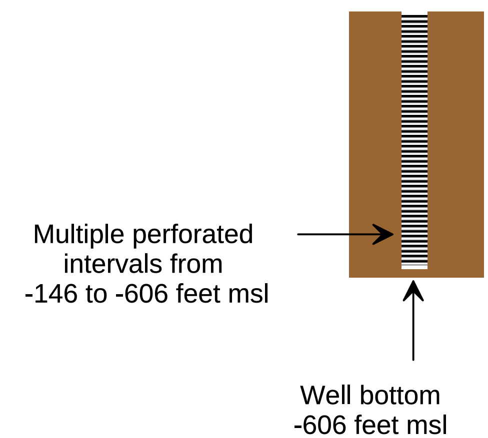
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (104 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





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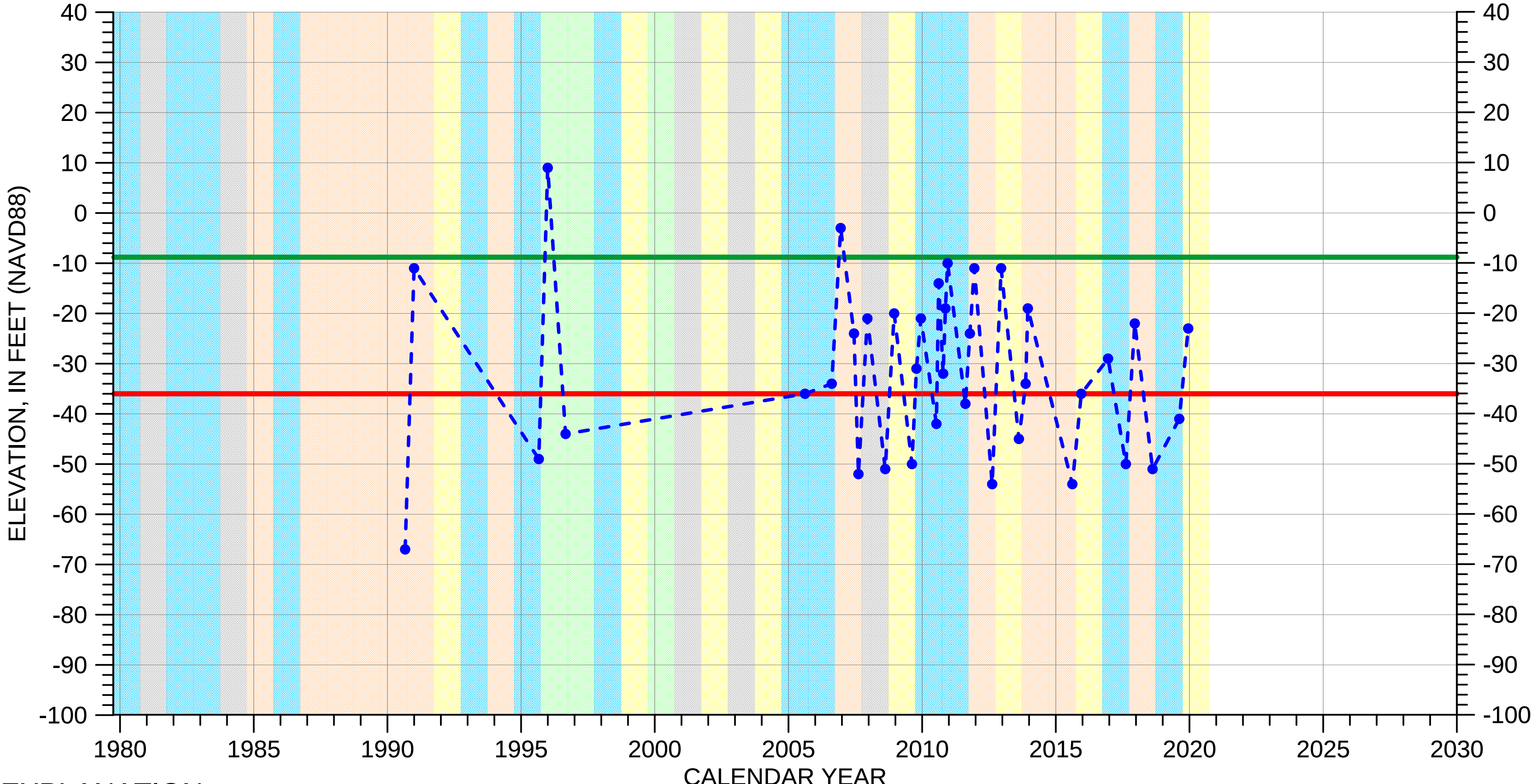
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/03E-02G01

Eastside Aquifer Subbasin

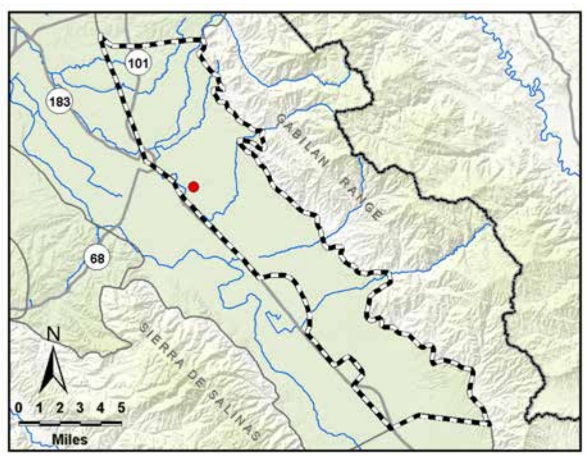


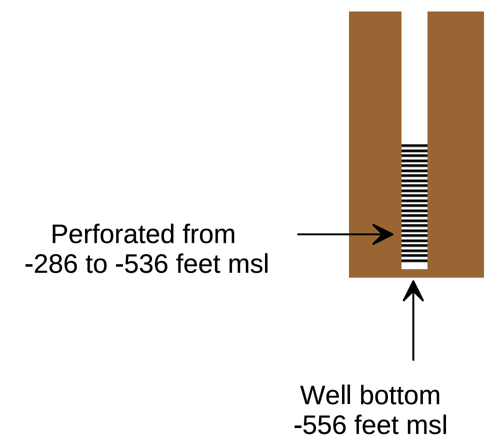
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (74 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





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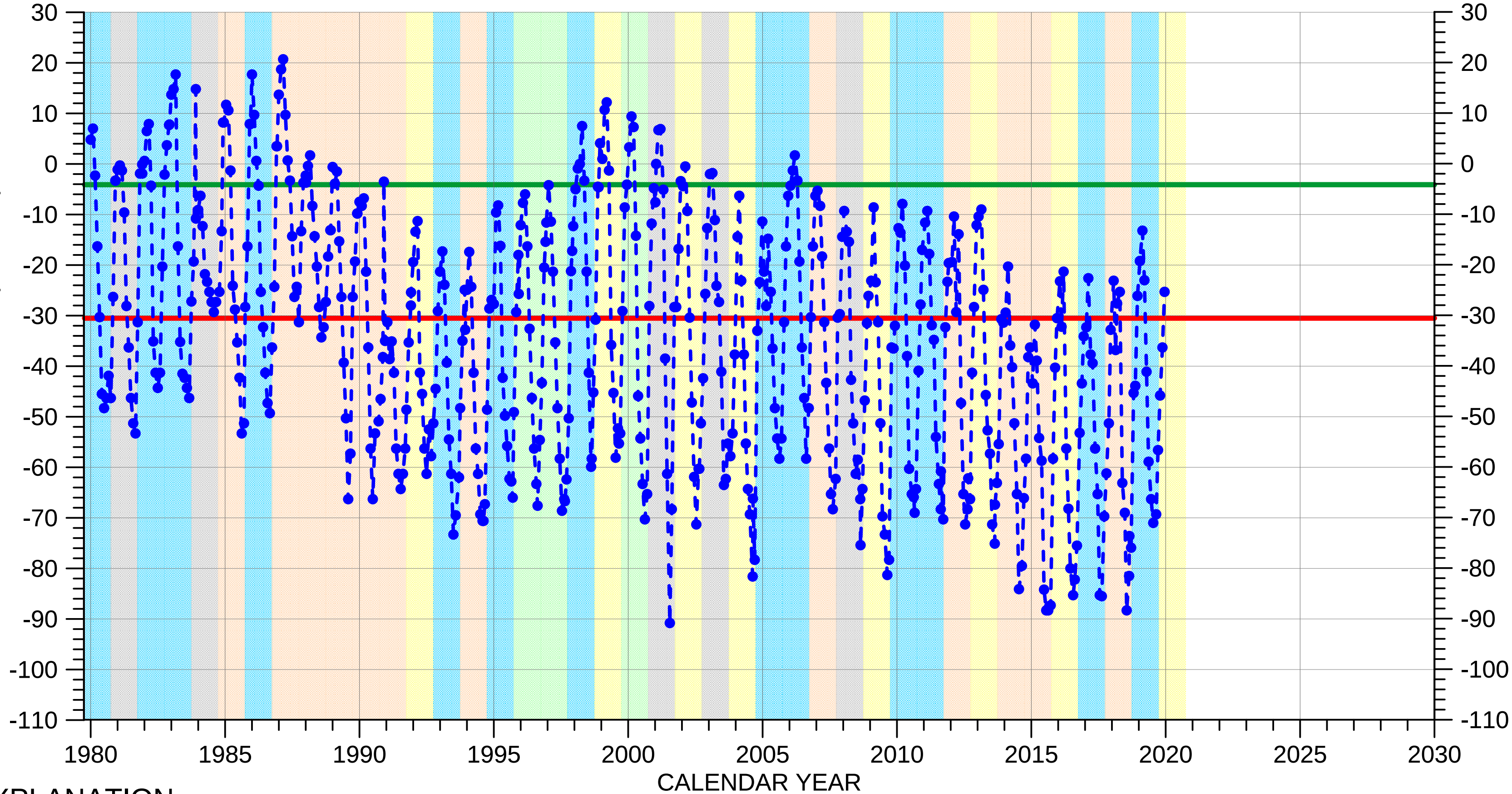
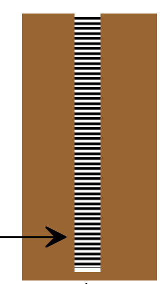
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-06R01

Eastside Aquifer Subbasin





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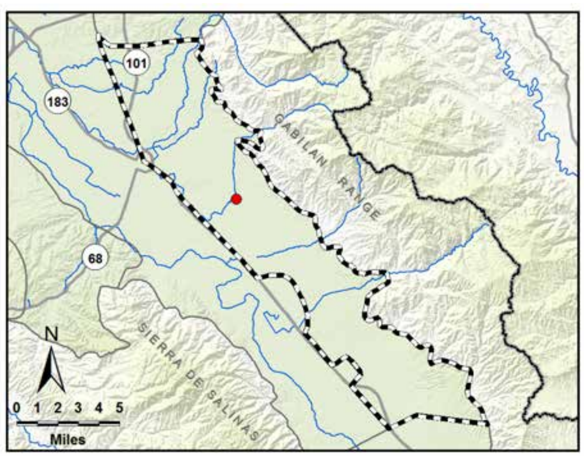
EXPLANATION

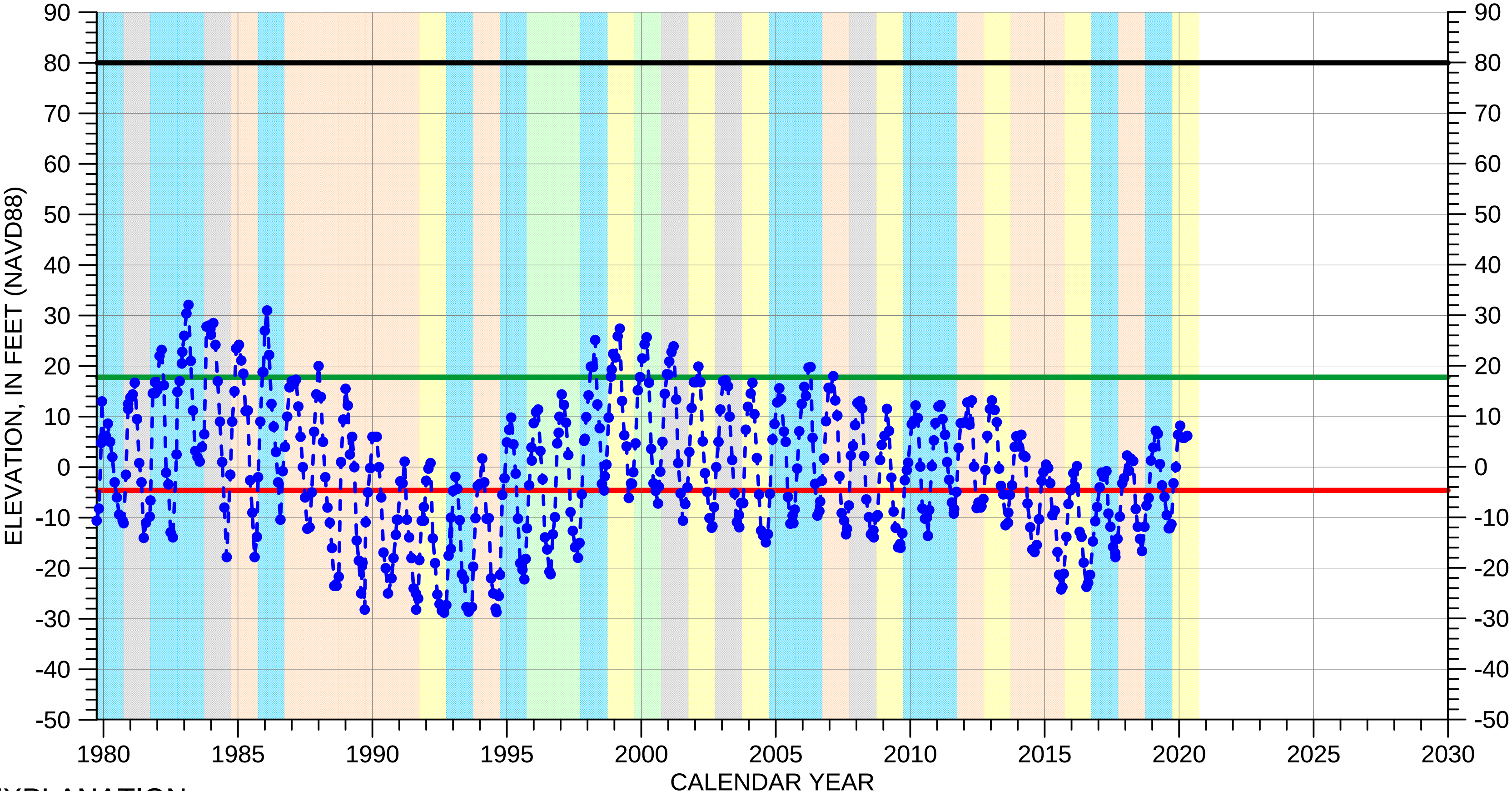
- Groundwater Elevation
- Suspect Measurement
- Land Surface (94 FT MSL)
- Measurable Objective
- Minimum Threshold

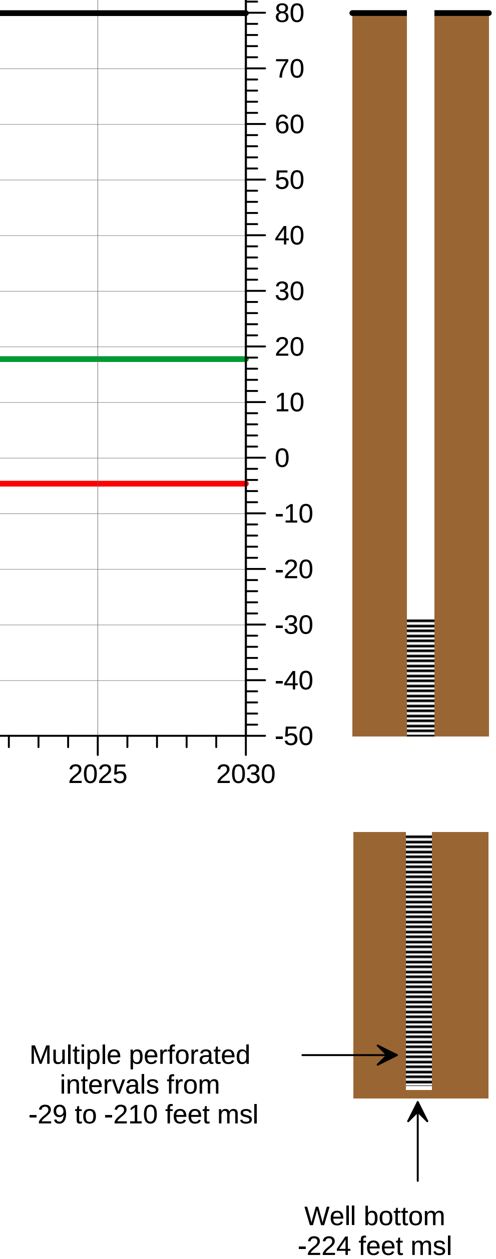
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-07R02 Eastside Aquifer Subbasin



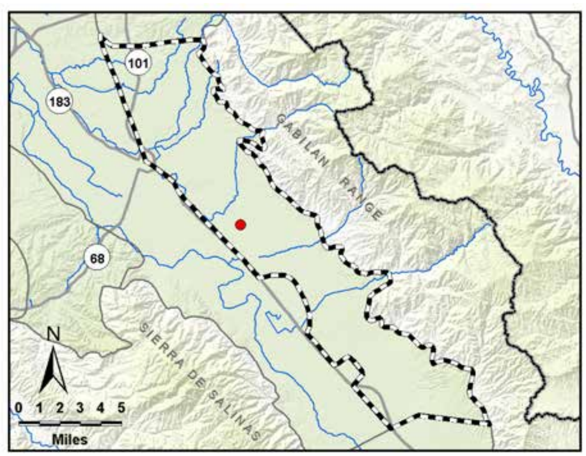


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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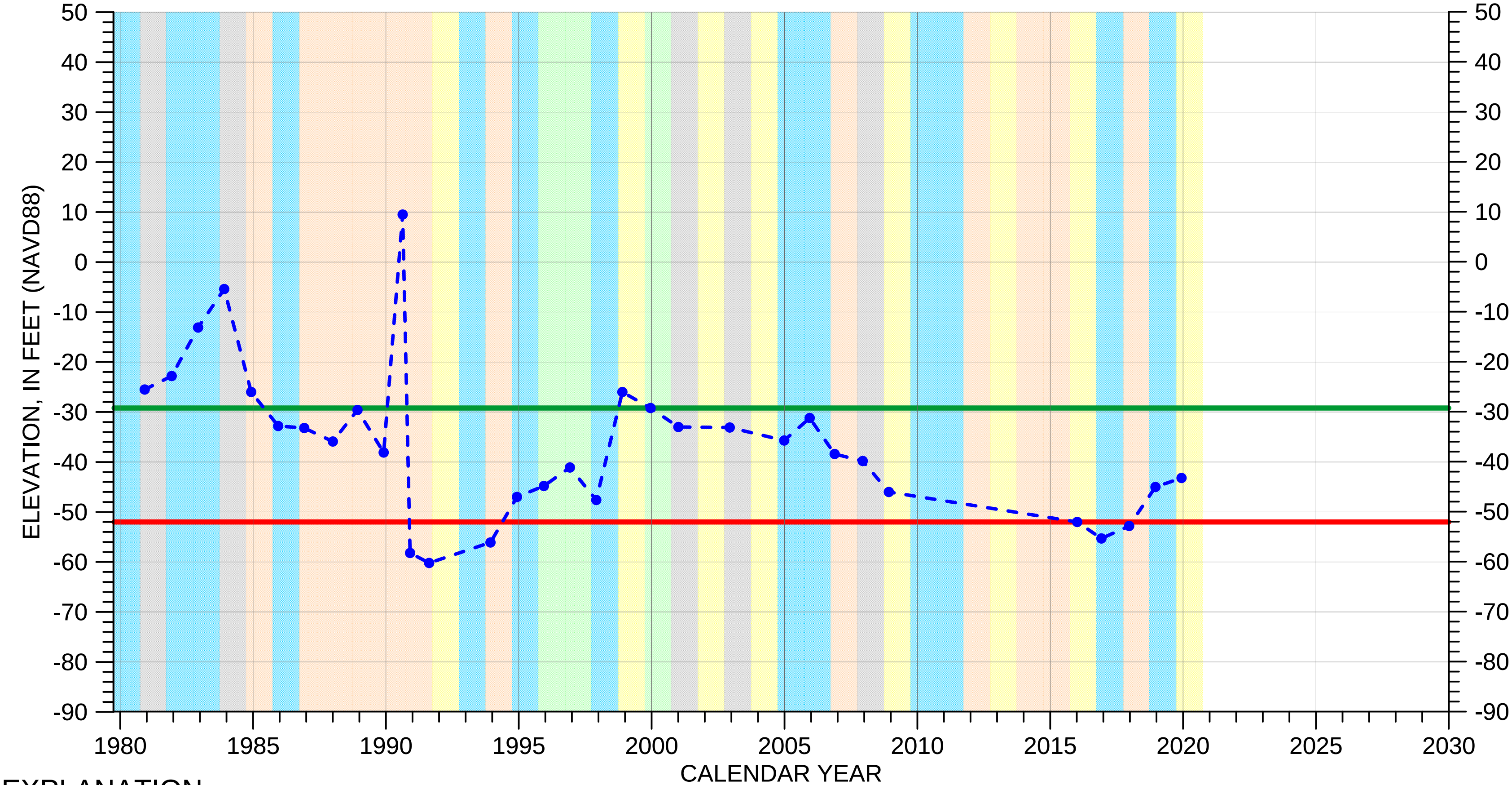
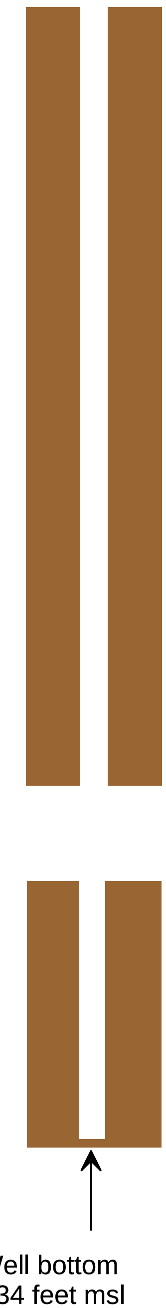
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-09D01

Eastside Aquifer Subbasin





Perforated interval unknown

EXPLANATION

Groundwater Elevation

Suspect Measurement

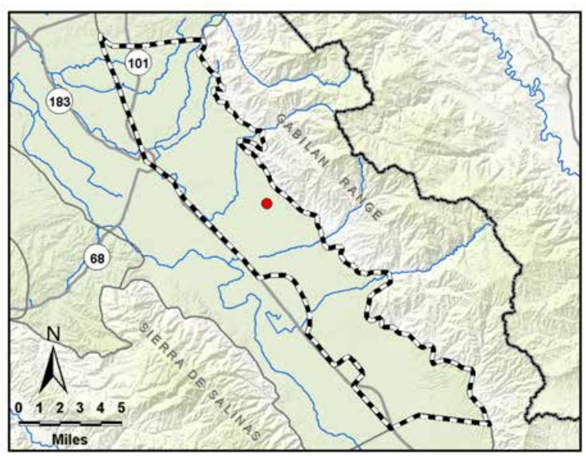
Land Surface (127 FT MSL)

Measurable Objective

Minimum Threshold

WATER YEAR TYPE DESIGNATION

DRY
DRY - NORMAL
NORMAL
WET - NORMAL
WET



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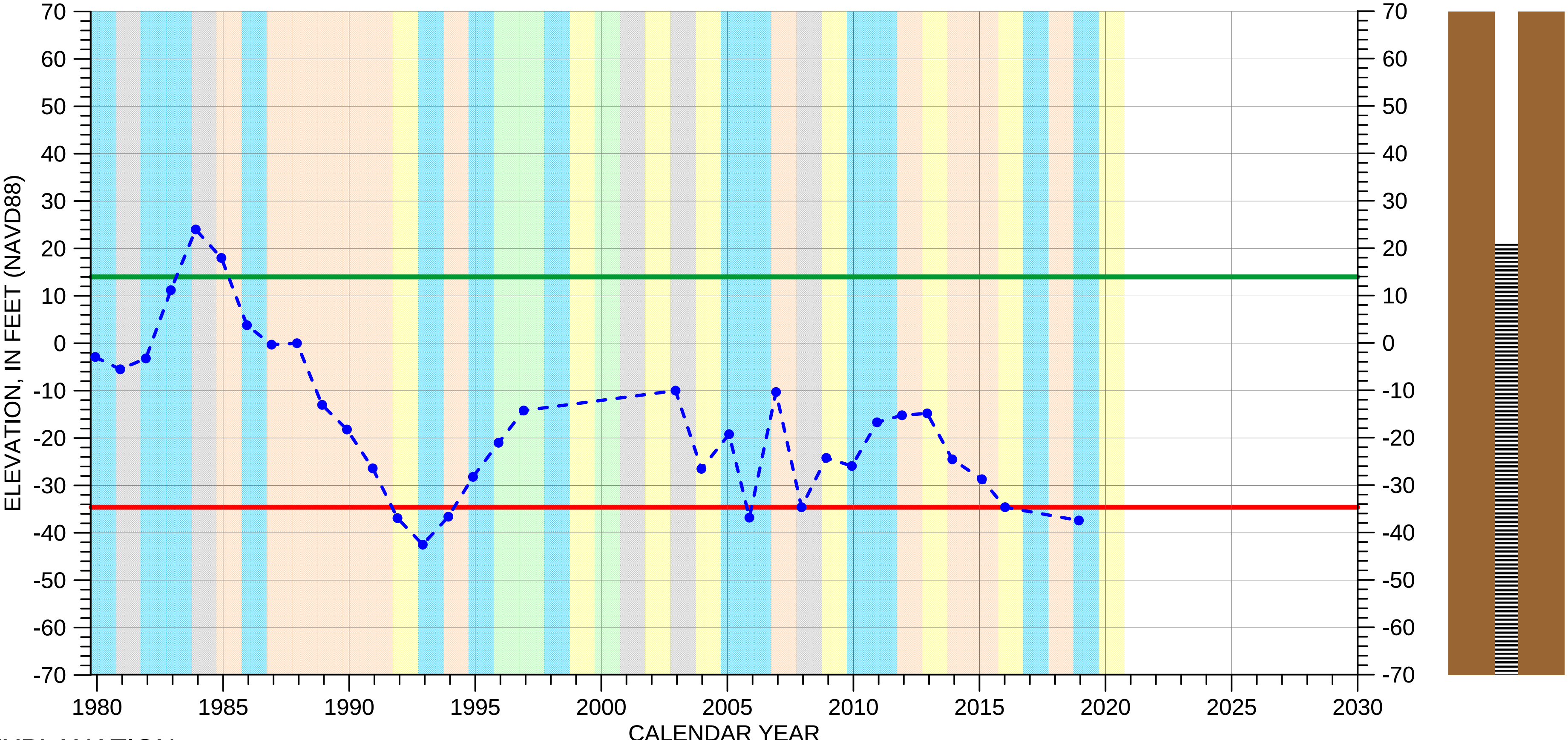
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-14N01

Eastside Aquifer Subbasin

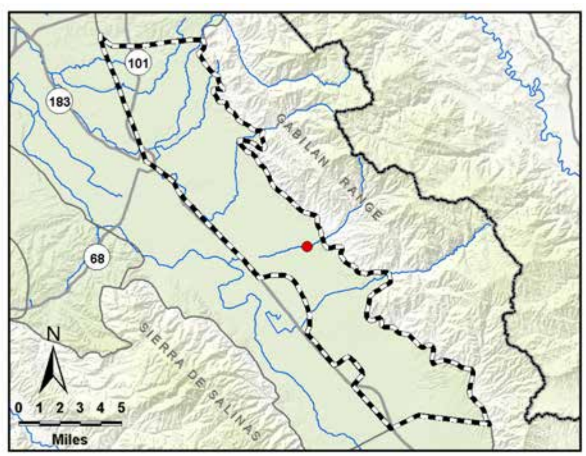


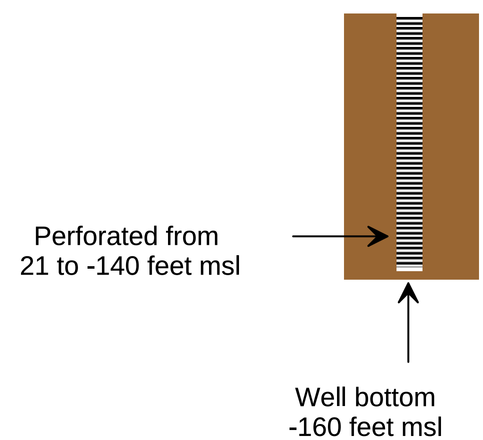
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (240 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





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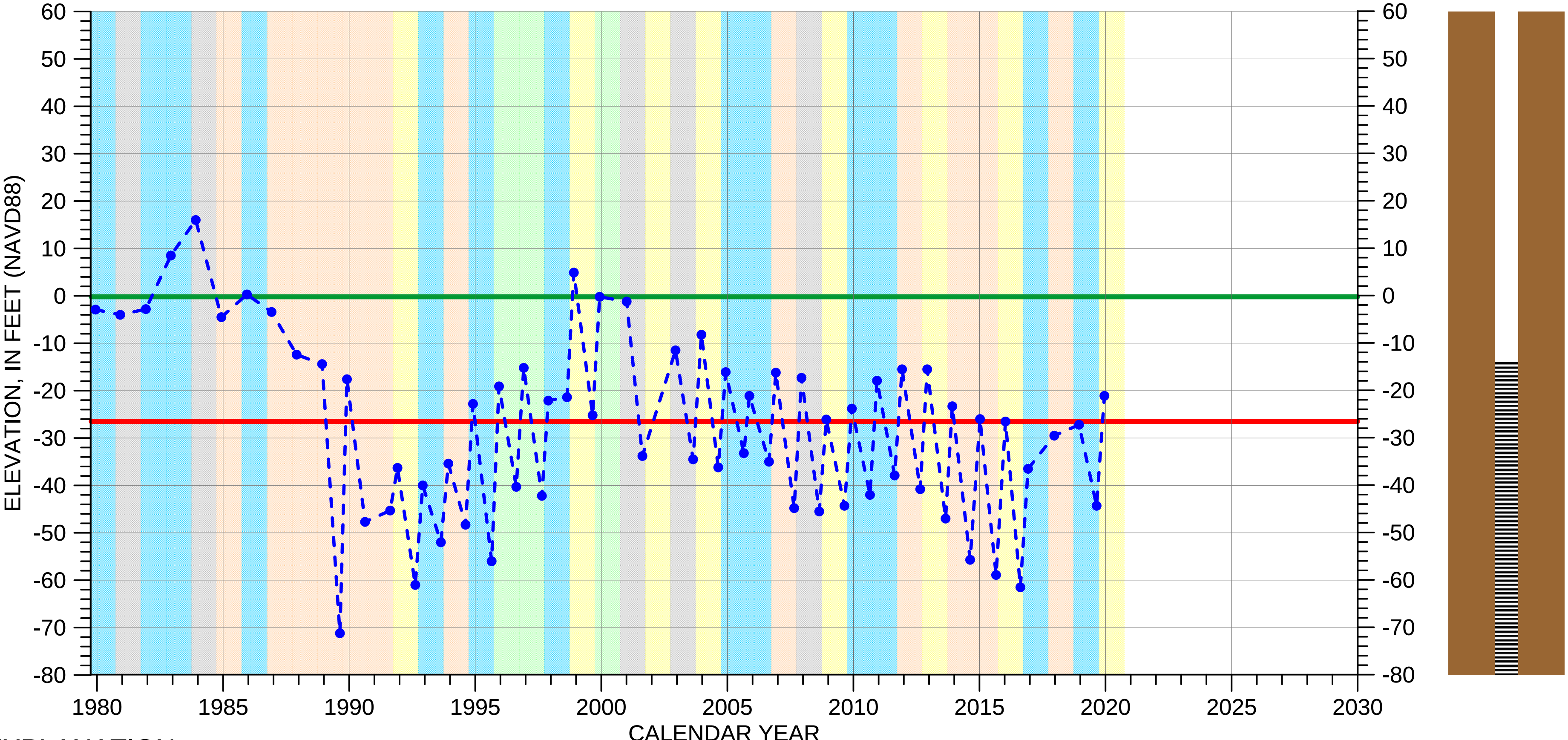
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-15D02

Eastside Aquifer Subbasin



Perforated from -14 to -314 feet msl

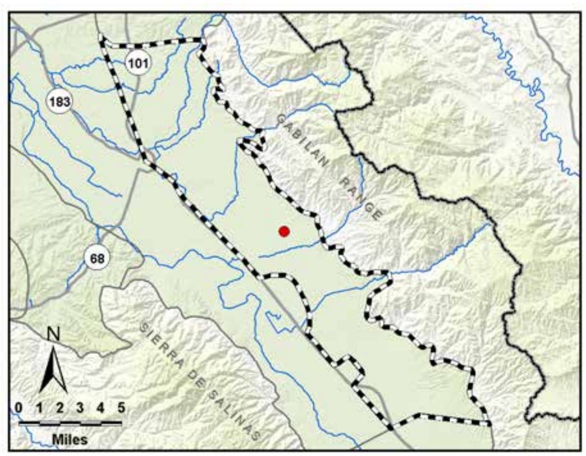
Well bottom -324 feet msl

EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (186 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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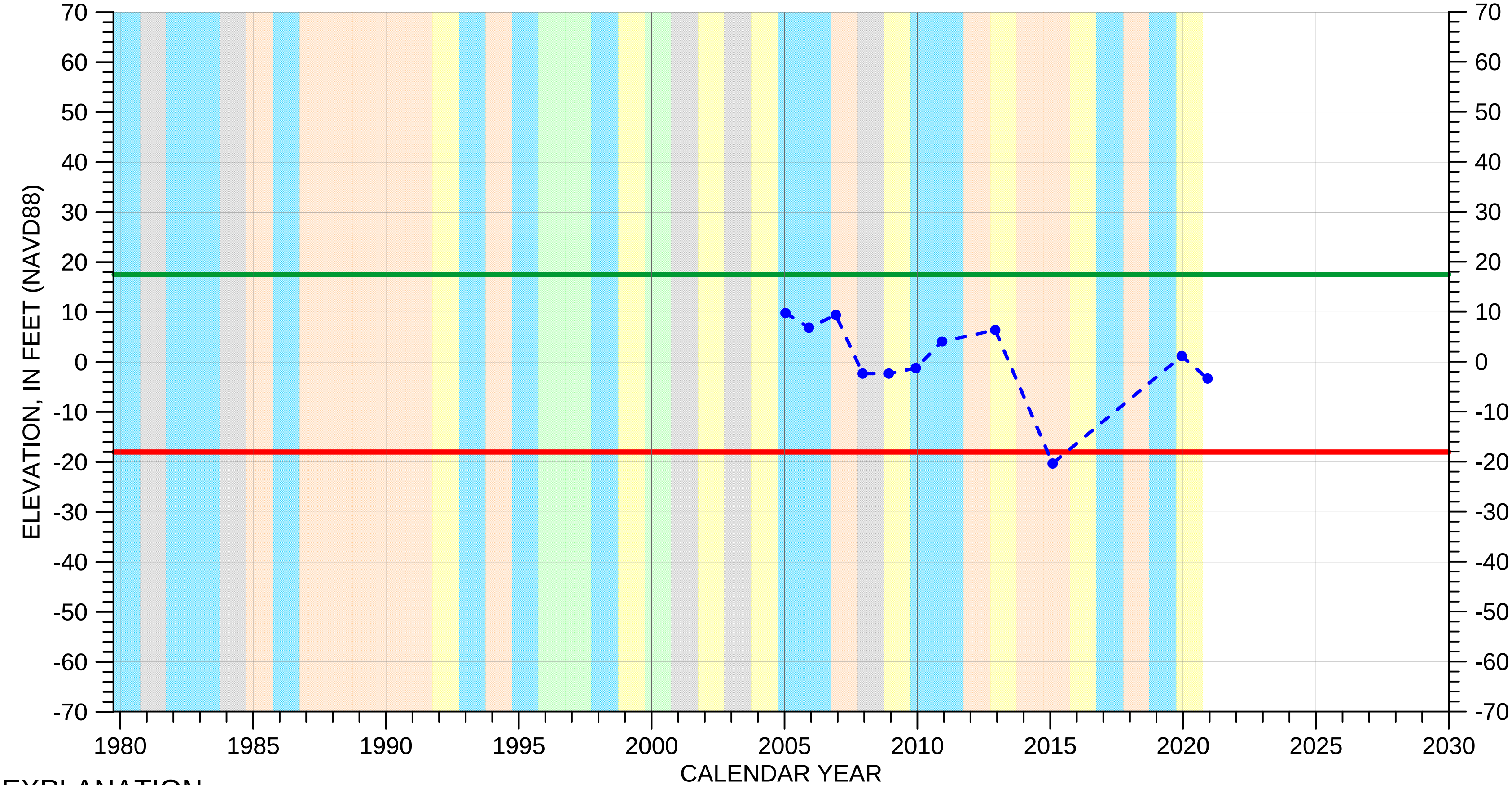
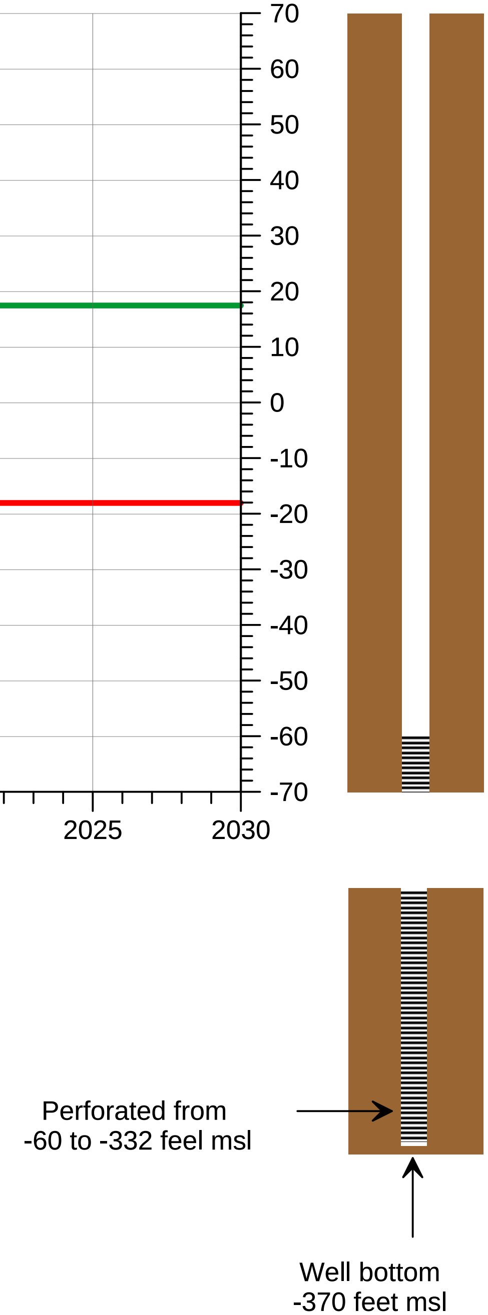
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-17P02

Eastside Aquifer Subbasin



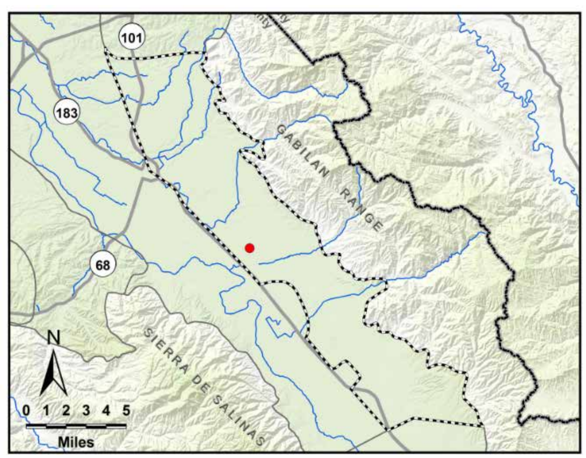


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (97 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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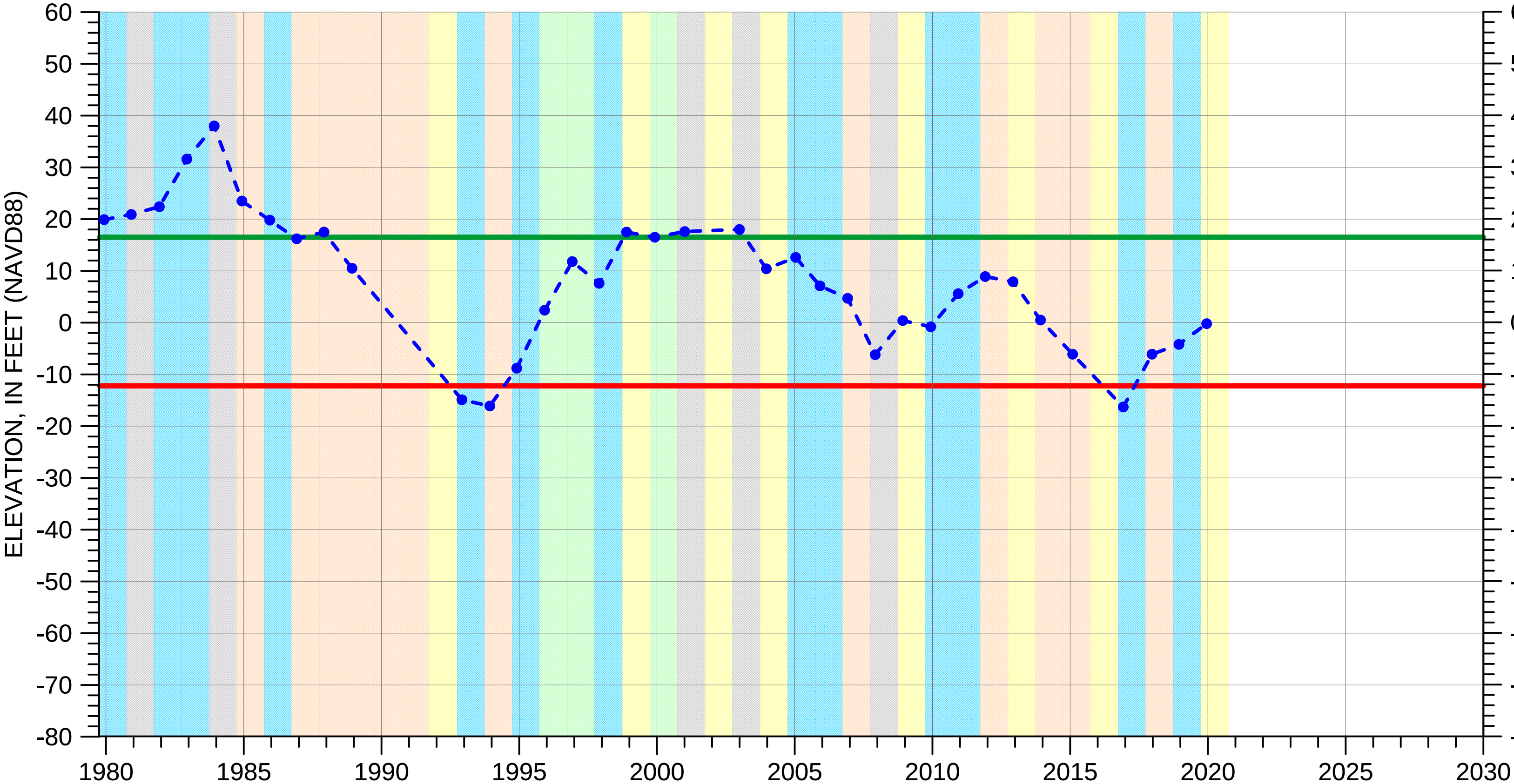
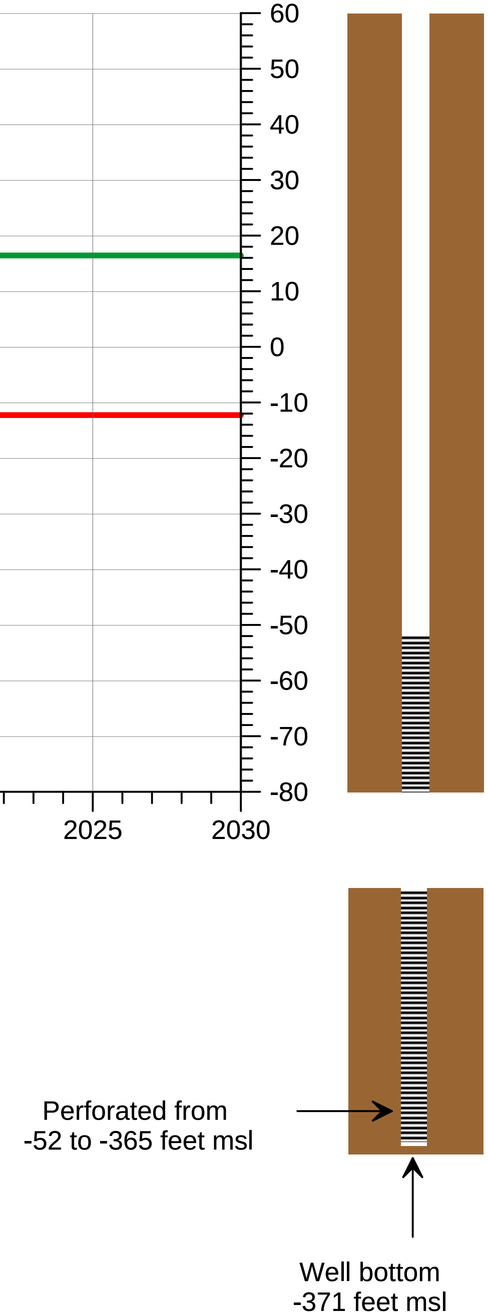
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-21F04

Eastside Aquifer Subbasin



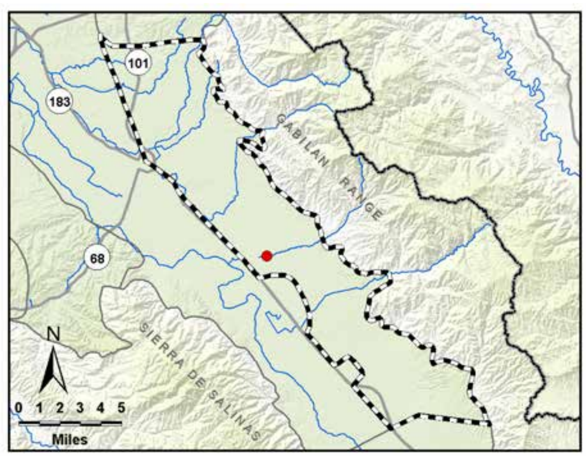


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (127 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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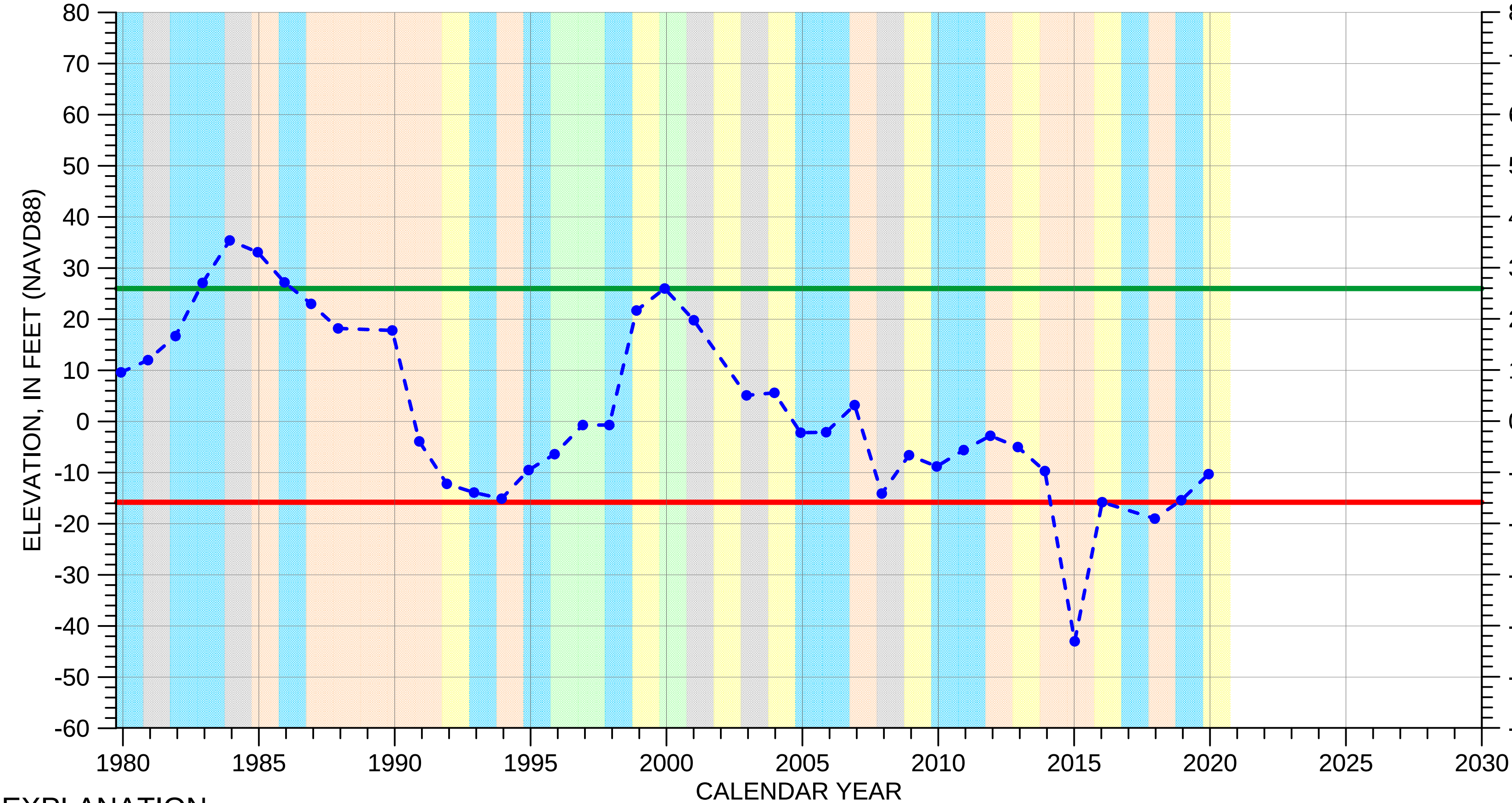
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-24N03

Eastside Aquifer Subbasin



Perforated interval unknown

Well bottom
-98 feet msl

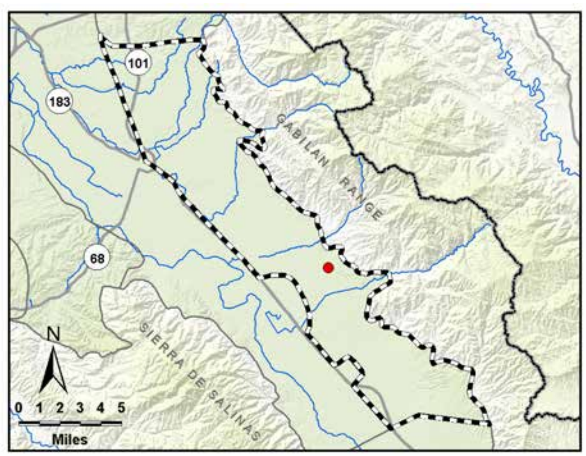
\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Chapter_5\Hydrographs\GRFs\15S_04E-24N03.grf

EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (272 FT MSL)
- Measurable Objective
- Minimum Threshold

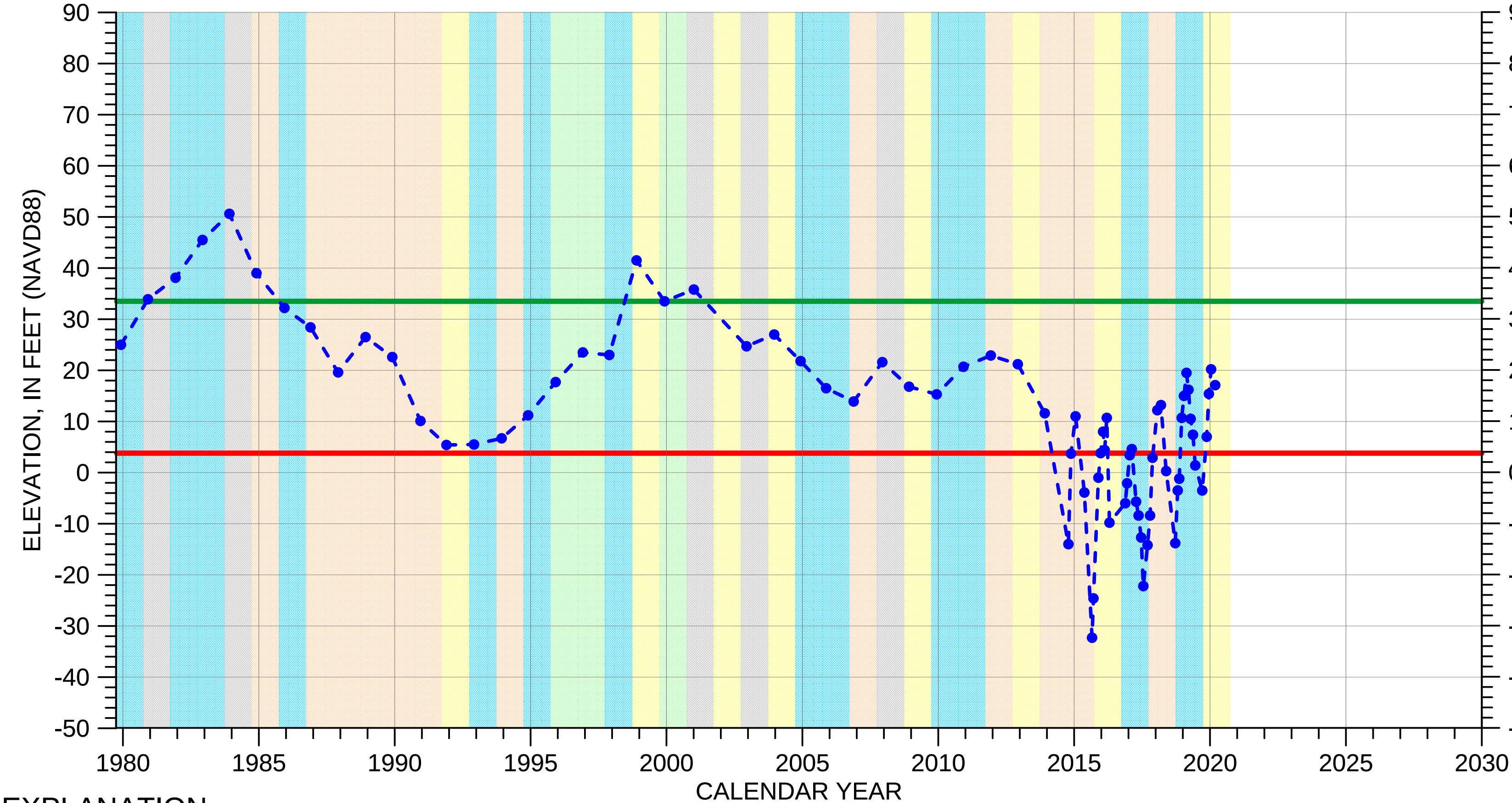
WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-27G01

Eastside Aquifer Subbasin

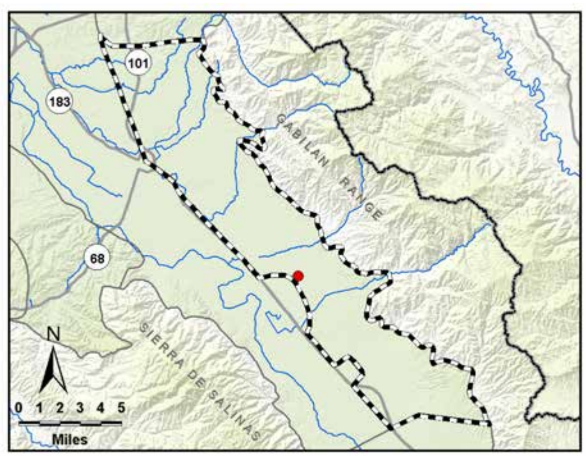


EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (189 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



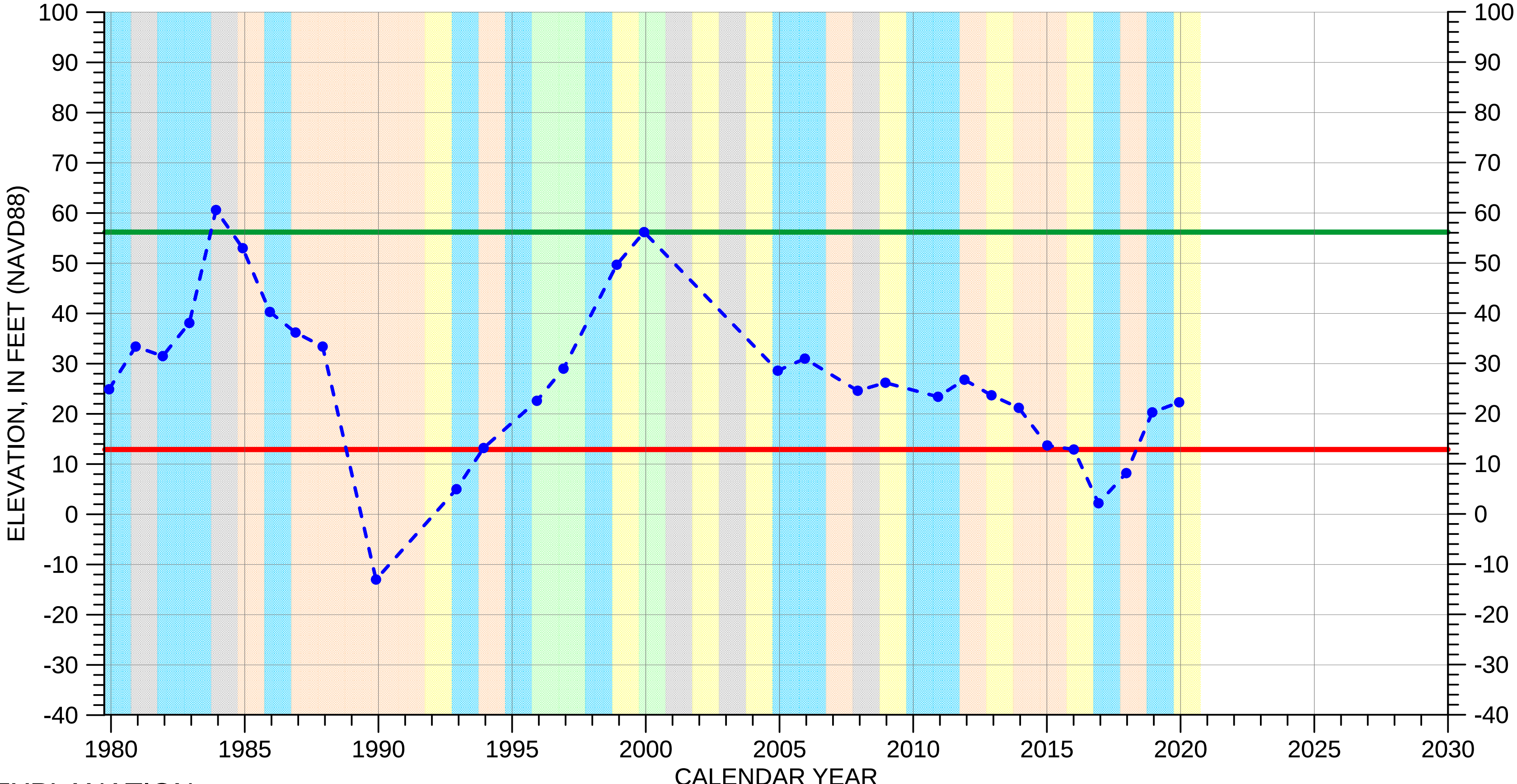
Perforated interval unknown

Well bottom
-419 feet msl

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Chapter_5\Hydrographs\GRFs\15S_04E-27G01.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 15S/04E-36H01

Eastside Aquifer Subbasin



EXPLANATION

Groundwater Elevation

Suspect Measurement

Land Surface (334 FT MSL)

Measurable Objective

Minimum Threshold

WATER YEAR TYPE DESIGNATION

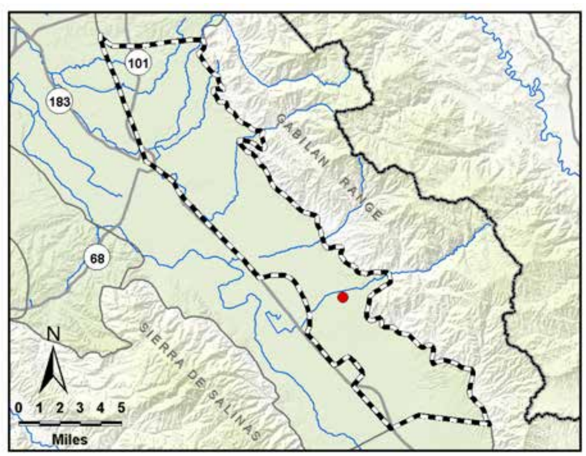
DRY

DRY - NORMAL

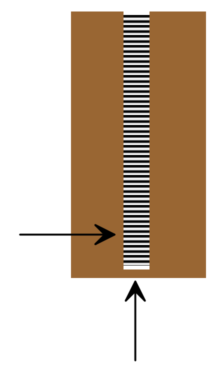
NORMAL

WET - NORMAL

WET



Perforated from
17 to -140 feet msl

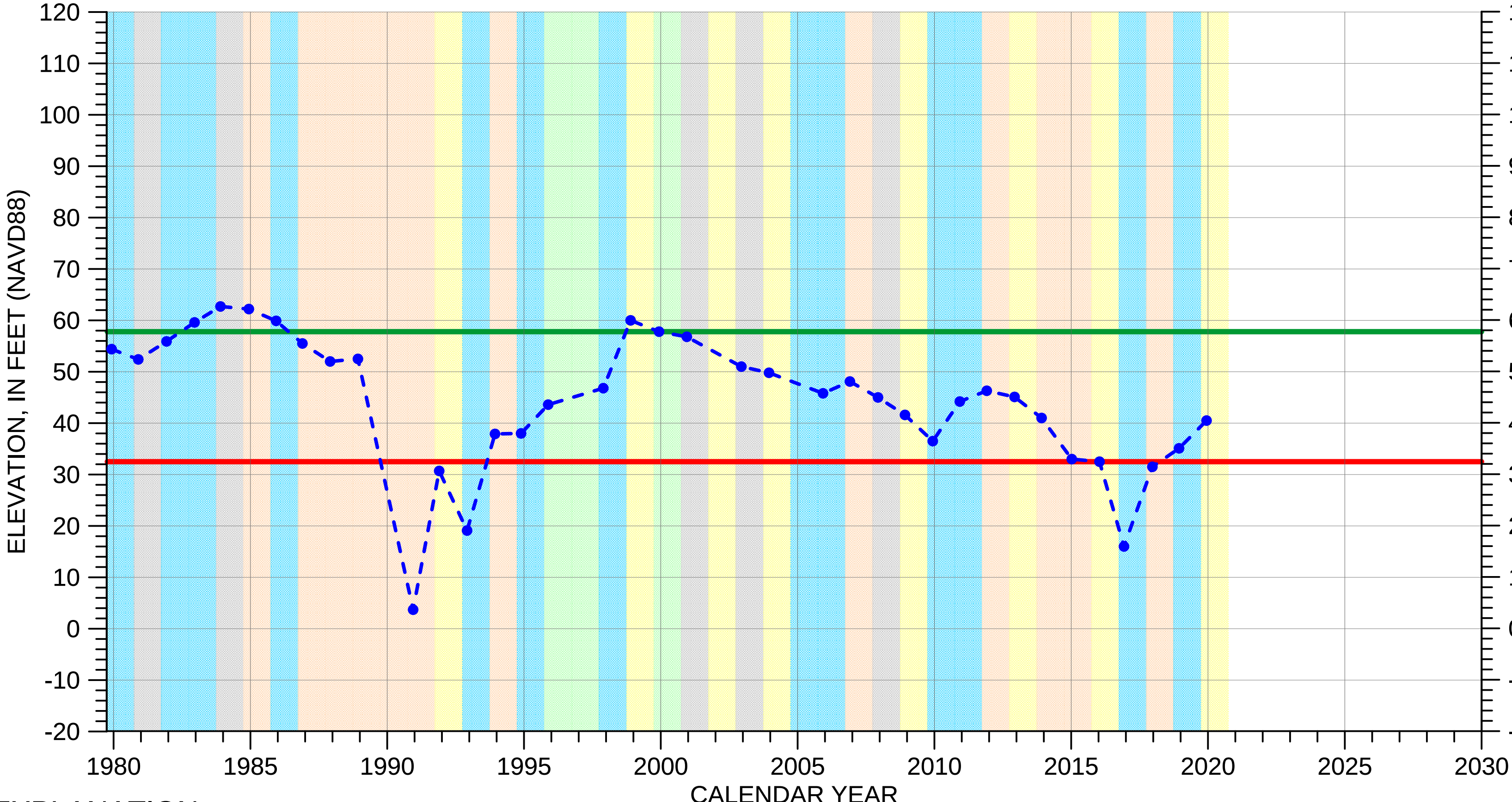


Well bottom
-154 feet msl

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Chapter_5\Hydrographs\GRFs\15S_04E-36H01.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/04E-02Q03

Eastside Aquifer Subbasin

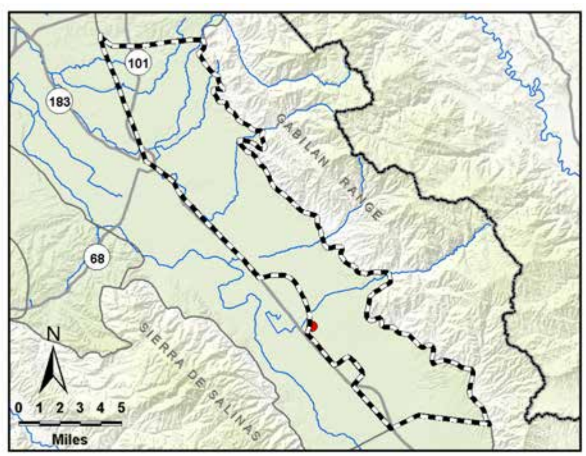


EXPLANATION

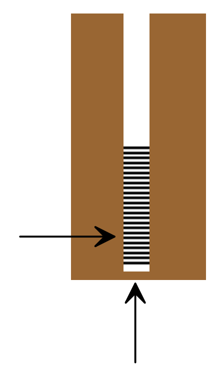
- Groundwater Elevation
- Suspect Measurement
- Land Surface (136 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



Multiple perforated intervals from -64 to -867 feet msl

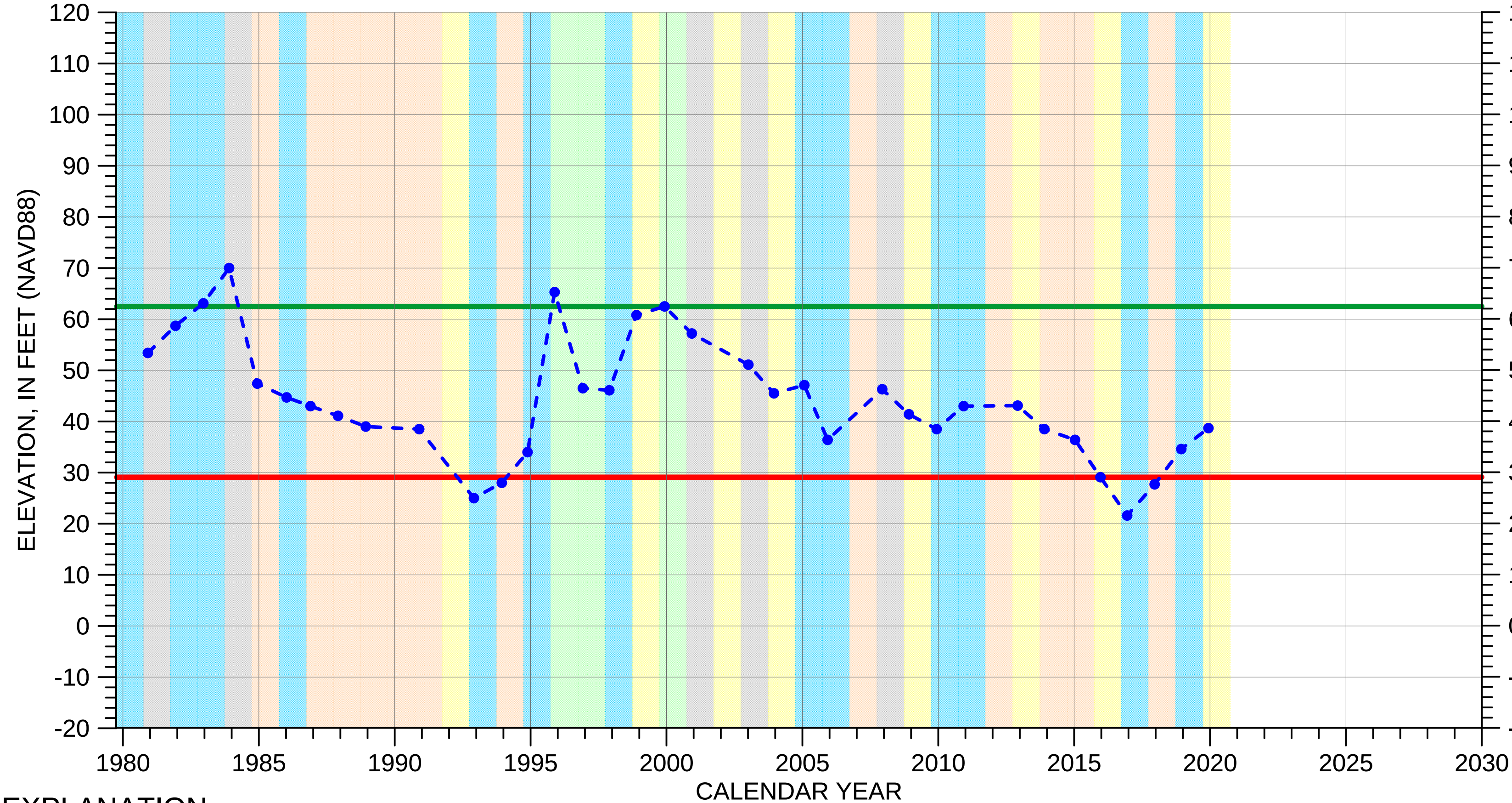


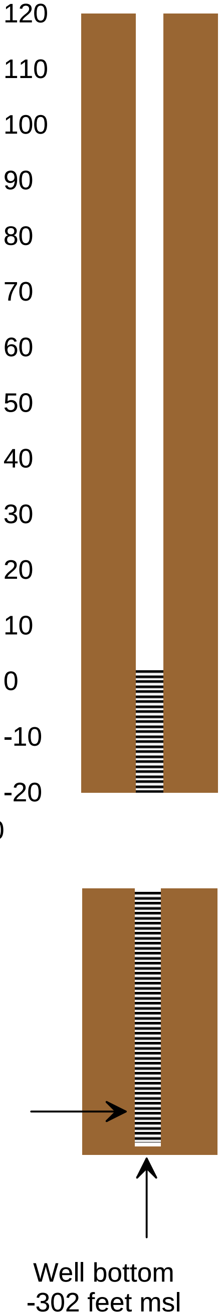
Well bottom -887 feet msl

\\tuc-data\public\projects\9100_Salinas_GSP\gsp\valley-wide\Chapter_5\Hydrographs\GRFs\16S_04E-02Q03.grf

HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/05E-05N01

Eastside Aquifer Subbasin





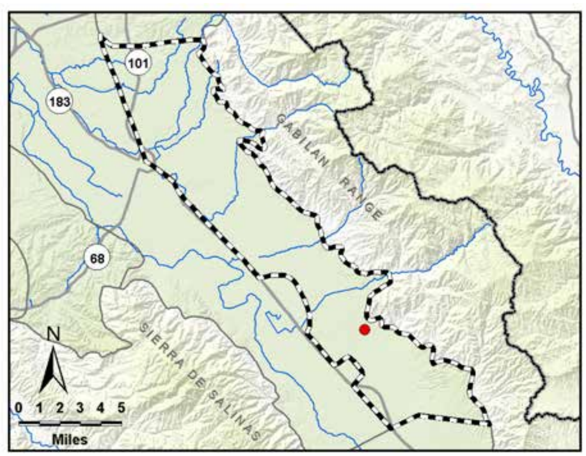
Multiple perforated intervals from 2 to -291 feet msl

EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (248 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



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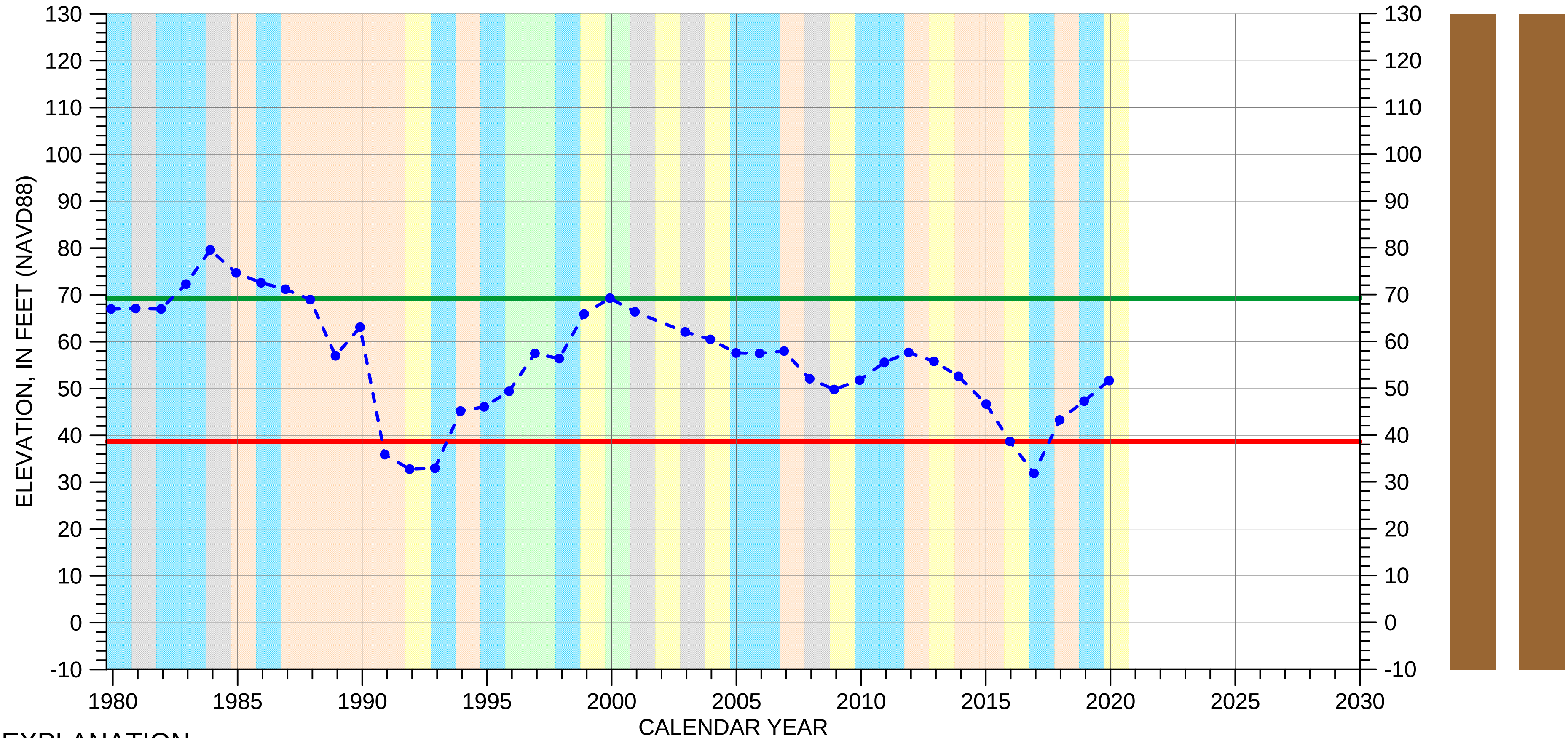
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/05E-07G01

Eastside Aquifer Subbasin

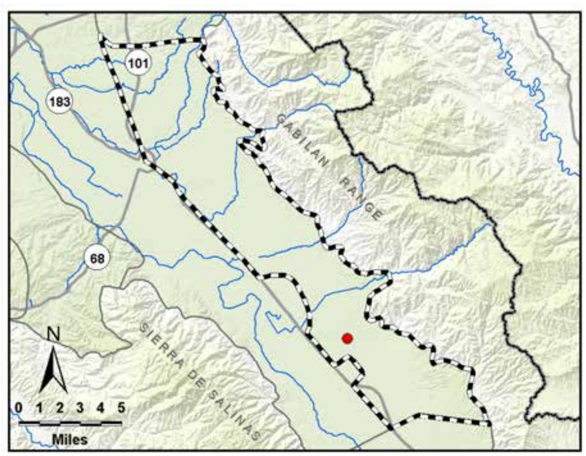


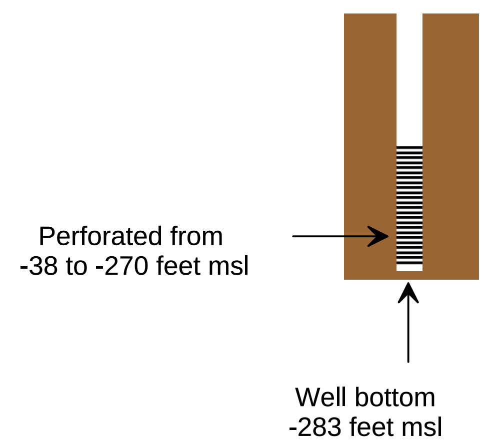
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (193 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





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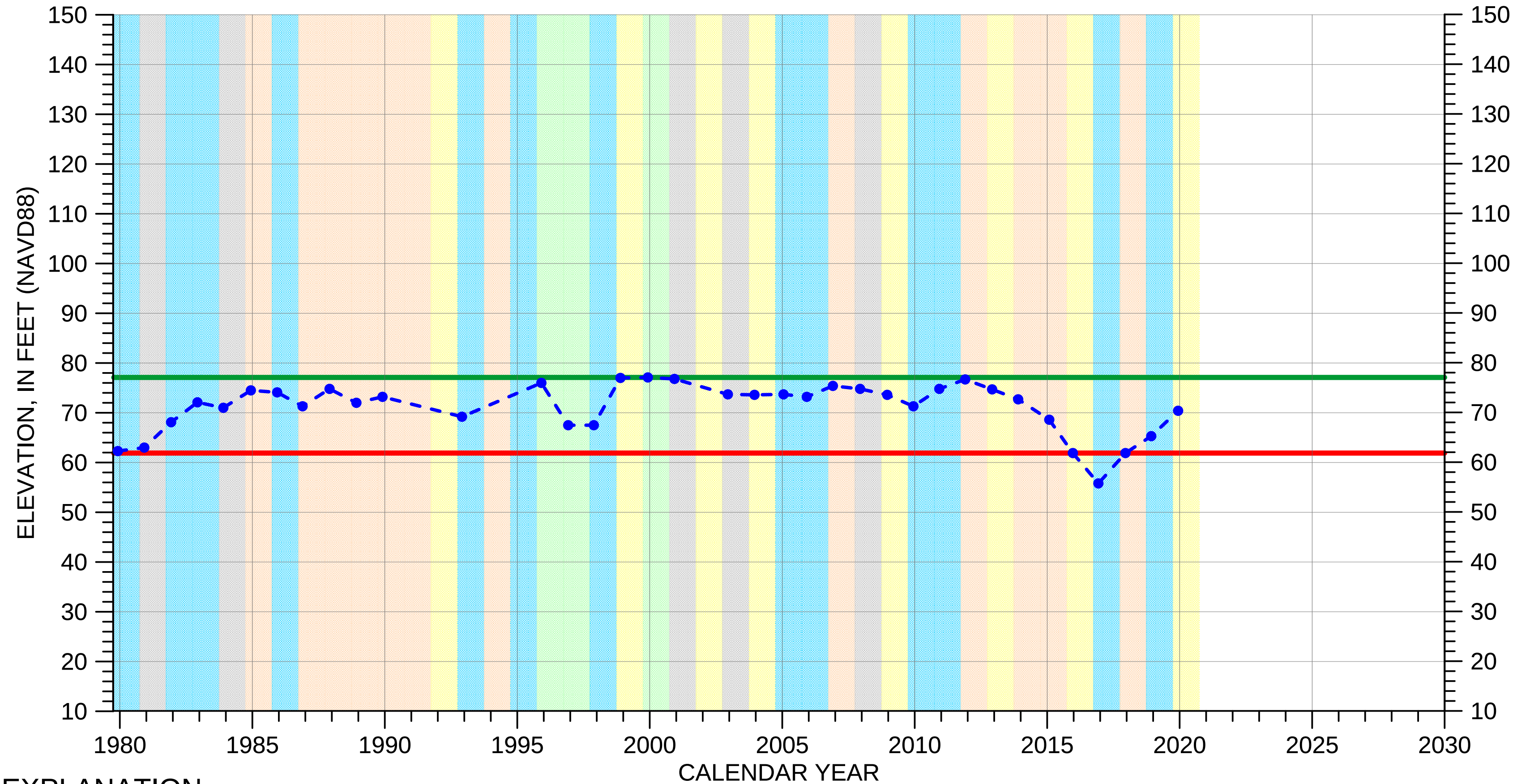
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/05E-17R01

Eastside Aquifer Subbasin

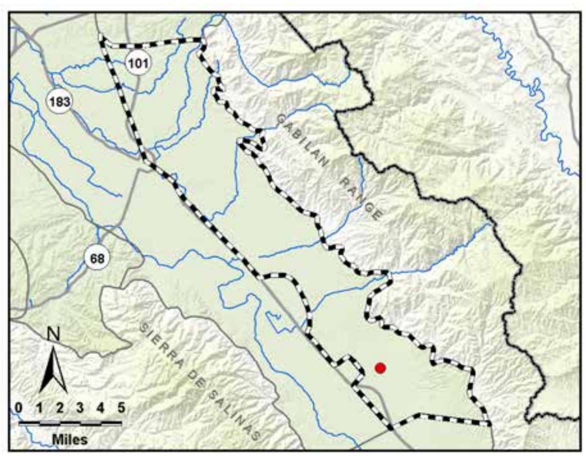


EXPLANATION

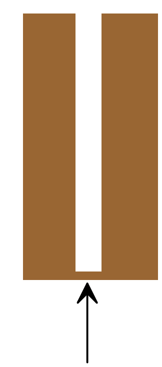
- Groundwater Elevation
- Suspect Measurement
- Land Surface (181 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET



Perforated interval unknown



Well bottom
-118 feet msl

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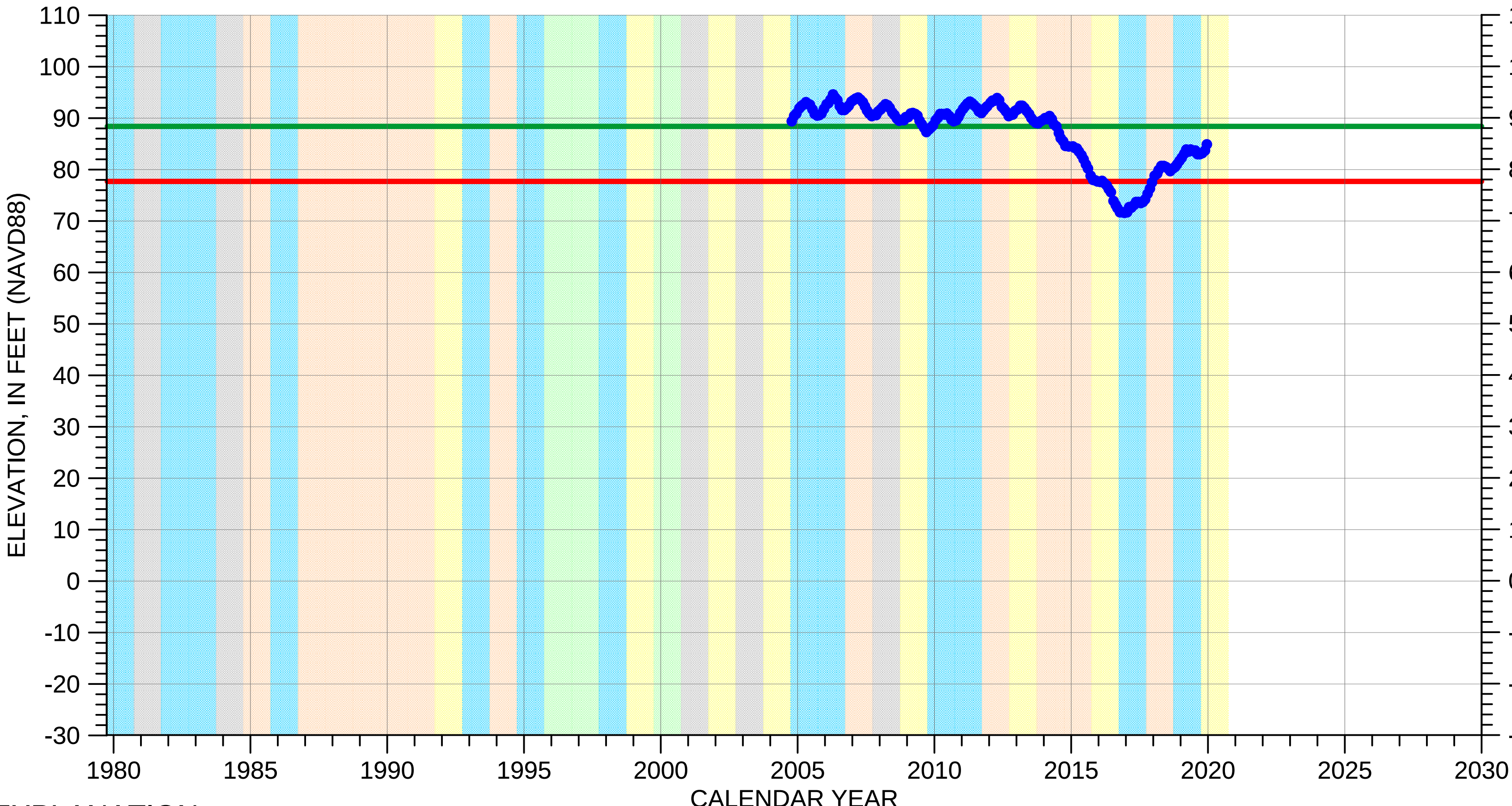
HYDROGRAPH OF MEASURED GROUNDWATER ELEVATION FOR 16S/05E-27G01

Eastside Aquifer Subbasin

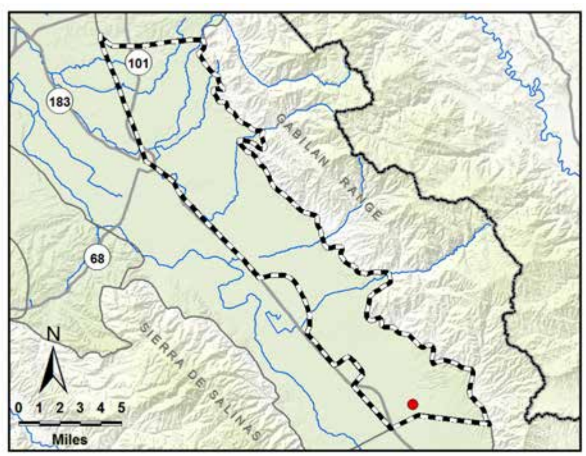


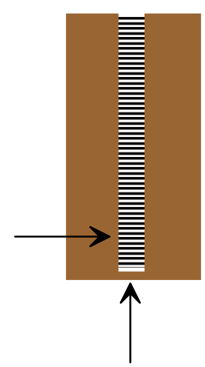
EXPLANATION

- Groundwater Elevation
- Suspect Measurement
- Land Surface (272 FT MSL)
- Measurable Objective
- Minimum Threshold

WATER YEAR TYPE DESIGNATION

- DRY
- DRY - NORMAL
- NORMAL
- WET - NORMAL
- WET





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Chapter 9
Appendix 9-A

Cost Estimates for Projects and Management Actions

Project A-1: Managed Aquifer Recharge of Overland Flow (Overland Flow MAR)

Capital and Annualized Costs
Managed Aquifer Recharge of Overland Flow Project
(Preliminary Opinion of Probable Cost)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		100
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$1,032,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$80,700
7	Annual O&M Cost		$		$6,000
8	Total Annualized Cost		$		$86,700
9	**Unit Cost**		$/AF		**$870**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mobilization/Demobilization	1	LS	$47,000	$47,000
11	Environmental and Stormwater	1	LS	$62,000	$62,000
12	Off-Stream Recharge Basin	8.5	AC	$48,500	$412,250
13	Land Access	1	LS	$40,000	$40,000
14	*Subtotal*				$561,250
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
15	Construction Contingency			30%	$124,000
16	General Conditions			15%	$84,000
17	Contractor Overhead and Profit			15%	$84,000
18	Sales Tax			9.25%	$10,400
19	Engineering, Legal, Admininstrative, Contingencies			30%	$168,000
20	***Total Capital Cost***				$1,032,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
21	Detention Basin Maintenance	1	LS	$4,300	$4,300
22	Contingency			30%	$1,300
23	***Total O&M Cost***				$6,000

NOTES:
1. "Project Yield" based on: Assumed 100 acre-feet per year.
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. Line 11, Environmental and stormwater requirements, are estimated at 15% of capital base costs for off-stream basins.
5. Line 12 inclides construction of the recharge basin; this cost assumes inclusion of site civil earthwork and access road improvements.
6. Line 13 land access costs are those for acquiring access to land for construction through an easement, license, or other mechansim.
7. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.

Project A-2: Floodplain Enhancement and Recharge

Capital and Annualized Costs
Eastside Subbasin - Project No. 6, Eastside Floodplain Enhancement and Recharge
(Preliminary Opinion of Probable Cost)

Line No.	**Description**		**Units**		**Total**
1	Project Yield		acre-feet per year		1,000
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$12,596,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$985,400
7	Annual O&M Cost		$		$64,000
8	Total Annualized Cost		$		$1,049,400
9	**Unit Cost**		$/AF		**$1,050**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mobilization/Demobilization	1	LS	$328,000	$328,000
11	Environmental and Stormwater	1	LS	$1,313,000	$1,313,000
11	No. 5, Natividad Road (Gabilan Ck)	40	AC	$48,500	$1,940,000
12	No. 6 Old Stage Natividad	1.1	AC	$48,500	$53,350
13	No. 7 Old Stage Alisal	7.1	AC	$48,500	$344,350
14	No 8 Old Stage Upper/Lower	18.1	AC	$48,500	$877,850
1	No. 11 Airport	32.7	AC	$48,500	$1,585,950
2	Land Access	1	LS	$450,000	$450,000
2	*Subtotal*				$6,892,500
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
3	Construction Contingency			30%	$1,440,000
4	General Conditions			15%	$1,034,000
5	Contractor Overhead and Profit			15%	$1,034,000
6	Sales Tax			9.25%	$127,500
7	Engineering, Legal, Admininstrative, Contingencies			30%	$2,068,000
8	***Total Capital Cost***				$12,596,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
9	Detention Basin Maintenance	1	LS	$49,500	$49,500
10	Contingency			30%	$14,900
11	***Total O&M Cost***				$64,000

NOTES:
1. "Project Yield" based on: Estimated detention basin benefits as provided in February 2021 presentation, *Salinas Valley Stormwater Plan Implementation,* Watershed Coordinator Support.
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. Line 11, Environmental and stormwater requirements, are estimated at 25% of capital base costs for in-stream basins.
5. Line 12 incldes construction of the recharge basin; this cost assumes inclusion of site civil earthwork and access road improvements.
6. Line 13 land access costs are those for acquiring access to land for construction through an easement, license, or other mechansim.
7. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
8. "Annualized Capital Cost" based on facility life and interest rate.

Project B-1: 11043 Diversion at Chualar

Capital and Annualized Costs
11043 Diversion at Chualar
(Preliminary Cost Estimate)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		4,600
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$55,684,000
5	Cost Recovery Factor		–		0.078
6	Annualized Capital Cost		$		$4,356,200
7	Annual O&M Cost		$		$1,538,700
8	Total Annualized Cost		$		$5,894,900
9	**Unit Cost**		$/AFY		**$1,280**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
Phase I - Chualar Diversion					
10	Pipeline	23,750	LF	$600	$14,250,000
11	Radial Collector, Booster Pump System (32 MGD firm capacity)	1	LS	$4,334,000	$4,334,000
12	Radial Collector, Electrical and Controls	1	LS	$2,332,000	$2,332,000
13	Radial Collector, Concrete Structures and Laterals	1	LS	$4,992,000	$4,992,000
14	Infiltration Basins (including land costs)	1	EA	$3,000,000	$3,000,000
15	*Subtotal*				$28,908,000
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
16	Plumbing Appurtenance Contingency			30%	$8,672,400
17	General Conditions			15%	$4,336,200
18	Contractor Overhead and Profit			15%	$4,336,200
19	Sales Tax			8.75%	$758,800
20	Engineering, Legal, Admininstrative, Contingencies			30%	$8,672,400
21	***Total Capital Cost***				$55,684,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
22	Power	1	LS	$181,200	$181,200
23	Labor (Diversion Facilities, Basins)	1	LS	$710,400	$710,400
24	Equipment Repair & Replacement	1	LS	$213,100	$213,100
25	Miscellaneous Allowance	1	LS	$78,860	$78,900
26	Contingency			30%	$355,100
27	***Total O&M Cost***				$1,538,700

NOTES:
1. "Project Yield" based on: 25 cfs pumping 120 days per year at Chualar Diversion site with new radial collector well..
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" does not include additional treatment costs.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.
7. "Unit Cost" estimate does not include unit cost for treatment components of project.

Project B-2: 11043 Diversion at Soledad

Capital and Annualized Costs
11043 Diversion at Soledad
(Preliminary Cost Estimate)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		4,600
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$104,688,000
5	Cost Recovery Factor		–		0.078
6	Annualized Capital Cost		$		$8,189,700
7	Annual O&M Cost		$		$1,538,700
8	Total Annualized Cost		$		$9,728,400
9	**Unit Cost**		$/AFY		**$2,110**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
Phase II - Soledad Diversion					
10	Pipeline	66,150	LF	$600	$39,690,000
11	Radial Collector, Booster Pump System (32 MGD firm capacity)	1	LS	$4,334,000	$4,334,000
12	Radial Collector, Electrical and Controls	1	LS	$2,332,000	$2,332,000
13	Radial Collector, Concrete Structures and Laterals	1	LS	$4,992,000	$4,992,000
14	Infiltration Basins (including land costs)	1	EA	$3,000,000	$3,000,000
15	*Subtotal*				$54,348,000
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
16	Plumbing Appurtenance Contingency			30%	$16,304,400
17	General Conditions			15%	$8,152,200
18	Contractor Overhead and Profit			15%	$8,152,200
19	Sales Tax			8.75%	$1,426,600
20	Engineering, Legal, Admininstrative, Contingencies			30%	$16,304,400
21	***Total Capital Cost***				$104,688,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
22	Power	1	LS	$181,200	$181,200
23	Labor (Diversion Facilities, Basins)	1	LS	$710,400	$710,400
24	Equipment Repair & Replacement	1	LS	$213,100	$213,100
29	Miscellaneous Allowance	1	LS	$78,860	$78,900
30	Contingency			30%	$355,100
31	***Total O&M Cost***				$1,538,700

NOTES:
1. "Project Yield" based on: 25 cfs pumping 120 days per year at Soledad Diversion site with new radial collector well.
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" does not include additional treatment costs.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.
7. "Unit Cost" estimate does not include unit cost for treatment components of project.

Project B-3: Surface Water Diversion from Gabilan Creek

Capital and Annualized Costs
Gabilan Creek Diversion and Groundwater Recharge
(Preliminary Opinion of Probable Cost)

Line No.	**Description**		**Units**		**Total**
1	Project Yield		acre-feet per year		350
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$10,074,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$788,100
7	Annual O&M Cost		$		$34,000
8	Total Annualized Cost		$		$822,100
9	**Unit Cost**		$/AFY		**$2,350**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mobilization/Demobilization	1	LS	$258,000	$258,000
11	Environmental and Stormwater	1	LS	$749,000	$749,000
11	Earthwork/Site Preparation	1	LS	$148,000	$148,000
12	Diversion Structure	1	LS	$172,000	$172,000
13	Pipeline	1000	LF	$550	$550,000
14	Storage Basin (10 AF)	1	LS	$177,000	$177,000
15	Pump Station	1	LS	$500,000	$500,000
16	Equipment and Control Building	900	SF	$150	$135,000
17	Injection and Monitoring Wells	1	LS	$2,051,000	$2,051,000
18	Electrical, I&C	1	LS	$672,000	$672,000
19	Land Acquisiton	4	AC	$45,000	$180,000
20	*Subtotal*				$5,592,000
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
21	Plumbing Appurtenance Contingency			30%	$971,000
22	General Conditions			15%	$839,000
23	Contractor Overhead and Profit			15%	$839,000
24	Sales Tax			9.25%	$155,200
25	Engineering, Legal, Admininstrative, Contingencies			30%	$1,678,000
26	***Total Capital Cost***				$10,074,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
27	Power	1	LS	$2,900	$2,900
28	Labor (Diversion Facilities, Basin)	1	LS	$19,700	$19,700
29	Equipment Repair & Replacement	1	LS	$2,500	$2,500
30	Miscellaneous Allowance	1	LS	$1,100	$1,100
31	Contingency			30%	$7,900
32	***Total O&M Cost***				$34,000

NOTES:
1. "Project Yield" based on: 20 CFS max diversion producing a mean of 350 AFY.
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" excludes additional treatment costs.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.
7. "Unit Cost" estimate includes unit cost for treatment components of project.

Project B-4: Eastside Irrigation Water Supply Project

Capital and Annualized Costs
Eastside Irrigation Water Supply Project
(Preliminary Opinion of Probable Cost)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		3,000
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$139,928,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$10,946,600
7	Annual O&M Cost		$		$990,000
8	Total Annualized Cost		$		$11,936,600
9	**Unit Cost**		$/AF		**$3,980**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mobilization/Demobilization	1	LS	$3,955,000	$3,955,000
11	Environmental and Stormwater	1	LS	$11,494,000	$11,494,000
12	Extraction Wells	1	LS	$8,865,000	$8,865,000
13	Earthwork/Site Preparation	1	LS	$99,000	$99,000
14	Storage Tank at Extraction Site	1	EA	$5,184,000	$5,184,000
15	Pump Station at Extraction Site	1	EA	$3,576,960	$3,576,960
16	Distribution System Tanks	5	EA	$830,000	$4,150,000
17	Distribution System PS	5	EA	$715,000	$3,575,000
18	Horizontal Directional Drill	625	LF	$2,600	$1,625,000
19	Pipeline	85,500	LF	$400	$34,200,000
20	Electrical, I&C	1	LS	$6,338,000	$6,338,000
21	Land Acquisiton	7.5	AC	$45,000	$337,500
22	*Subtotal*				$83,399,460
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
23	Plumbing Appurtenance Contingency			30%	$4,946,000
24	General Conditions			15%	$12,510,000
25	Contractor Overhead and Profit			15%	$12,510,000
26	Sales Tax			9.25%	$1,542,900
27	Engineering, Legal, Admininstrative, Contingencies			30%	$25,020,000
28	***Total Capital Cost***				$139,928,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
29	Power	1	LS	$404,100	$404,100
30	Labor (Tanks, Pipeline, Pump Stations)	1	LS	$192,000	$192,000
31	Equipment Repair & Replacement	1	LS	$165,500	$165,500
32	Contingency			30%	$228,500
33	***Total O&M Cost***				$990,000

NOTES:
1. "Project Yield" based on: Estimated extraction from 180/400-Foot Aquifer Subbasin from agricultural supply wells.
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" excludes additional treatment costs.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.

Project B-5: Salinas Scalping Plant

Capital and Annualized Costs
500,000 gpd Scalping Plant
(Preliminary Opinion of Probable Cost)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		560
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$14,183,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$1,109,500
7	Annual O&M Cost		$		$1,540,000
8	Total Annualized Cost		$		$2,649,500
9	**Unit Cost**		$/AF		**$4,730**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	500,000 gal Scalping Plant	1	LS	$11,100,000	$11,100,000
11	*Subtotal*				$11,100,000
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
12	Plumbing Appurtenance Contingency			10%	$1,110,000
13	General Conditions			5%	$555,000
14	Contractor Overhead and Profit			0%	$0
15	Sales Tax			9.25%	$308,000
16	Engineering, Legal, Admininstrative, Contingencies			10%	$1,110,000
17	***Total Capital Cost***				$14,183,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
18	O&M	1	LS	$1,400,000	$1,400,000
19	Contingency			10%	$140,000
20	***Total O&M Cost***				$1,540,000

NOTES:
1. "Project Yield" based on: 500,000 gpd.
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" excludes additional treatment costs.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.

Capital and Annualized Costs
250,000 gpd Scalping Plant
(Preliminary Opinion of Probable Cost)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		280
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$9,839,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$769,700
7	Annual O&M Cost		$		$1,045,000
8	Total Annualized Cost		$		$1,814,700
9	**Unit Cost**		$/AF		**$6,480**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	250,000 gal Scalping Plant	1	LS	$7,700,000	$7,700,000
11	*Subtotal*				$7,700,000
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
12	Plumbing Appurtenance Contingency			10%	$770,000
13	General Conditions			5%	$385,000
14	Contractor Overhead and Profit			0%	$0
15	Sales Tax			9.25%	$213,700
16	Engineering, Legal, Admininstrative, Contingencies			10%	$770,000
17	***Total Capital Cost***				$9,839,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
18	O&M	1	LS	$950,000	$950,000
19	Contingency			10%	$95,000
20	***Total O&M Cost***				$1,045,000

NOTES:
1. "Project Yield" based on: 250,000 gpd
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" excludes additional treatment costs.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.

Project C-1: Regional Municipal Supply Project

Capital and Annualized Costs
Regional Alternative Water Supply Project
(Preliminary Cost Estimate)

Line No.	**Description**		**Units**		**Total**
1	Project Yield		acre-feet per year		15,000
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$309,387,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$24,203,300
7	Annual O&M Cost		$		$11,874,000
8	Total Annualized Cost		$		$36,077,300
9	**Unit Cost**		$/AFY		**$2,405**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	SWRO Facility	13	MGD	$14,000,000	$182,000,000
11	Source Water Pipeline	58,080	LF	$400	$23,232,000
12	***Subtotal***				$205,232,000
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
13	General Conditions			15%	$30,784,800
14	Contractor Overhead and Profit			18%	$36,941,800
15	Sales Tax			8.75%	$17,957,800
16	Engineering, Legal, Admininstrative, Contingencies			20%	$12,313,900
17	Bonds and Insurance			3%	$6,157,000
18	***Total Capital Cost***				$309,387,000
OPERATIONS AND MAINTENANCE					
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
19	Desalination O&M	13	MGD	$913,400	$11,874,200
1	***Total O&M Annual Cost***				$11,874,000

NOTES:
1. "Facility Life" selected based on 25-yr anticipated life of extraction wells.
2. "Interest Rate" selected within expected range for public-financing options.
3. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.

Capital and Annualized Costs
Regional Alternative Water Supply Project - Distribution Low
(Preliminary Cost Estimate)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		15,000
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$65,257,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$5,105,100
7	Annual O&M Cost		$		$1,318,000
8	Total Annualized Cost		$		$6,423,100
9	**Unit Cost**		$/AFY		**$428**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mobilization/Demobilization	1	LS	$2,061,345	$2,061,345
11	Environmental and Stormwater	1	LS	$3,747,900	$3,747,900
12	Pipeline to Salinas	52,700	LF	$400	$21,080,000
13	Pipeline to Salinas Hils	39,100	LF	$300	$11,730,000
14	Distribution Pump Station	11.6	MGD	$350,000	$4,060,000
15	Electrical, I&C	1	LS	$609,000	$609,000
16	***Subtotal***				$43,288,245
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
17	General Conditions			15%	$6,493,200
18	Contractor Overhead and Profit			18%	$7,791,900
19	Sales Tax			8.75%	$3,787,700
20	Engineering, Legal, Admininstrative, Contingencies			20%	$2,597,300
21	Bonds and Insurance			3%	$1,298,600
22	***Total Capital Cost***				$65,257,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
23	Power	1	LS	$664,780.25	$664,780
24	Labor	1	LS	$180,000	$180,000
25	Equipment Repair & Replacement	1	LS	$168,956	$168,956
26	Contingency			30%	$304,100
27	***Total O&M Annual Cost***				$1,318,000

NOTES:
1. "Facility Life" selected based on 25-yr anticipated life of extraction wells.
2. "Interest Rate" selected within expected range for public-financing options.

Capital and Annualized Costs
Regional Alternative Water Supply Project - Distribution High
(Preliminary Cost Estimate)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		15,000
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$84,315,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$6,596,000
7	Annual O&M Cost		$		$1,515,000
8	Total Annualized Cost		$		$8,111,000
9	**Unit Cost**		$/AFY		**$541**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mobilization/Demobilization	1	LS	$2,101,193	$2,101,193
11	Environmental and Stormwater	1	LS	$3,820,350	$3,820,350
12	Pipeline to Salinas	52,700	LF	$400	$21,080,000
13	Pipeline to Salinas Hils	39,100	LF	$300	$11,730,000
14	Pipeline to Marina	9,850	LF	$300	$2,955,000
15	Pipeline to Castroville	29,500	LF	$300	$8,850,000
16	Distribution Pump Station	13.4	MGD	$350,000	$4,690,000
17	Electrical, I&C	1	LS	$703,500	$703,500
18	***Subtotal***				$55,930,043
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
19	General Conditions			15%	$8,389,500
20	Contractor Overhead and Profit			18%	$10,067,400
21	Sales Tax			8.75%	$4,893,900
22	Engineering, Legal, Admininstrative, Contingencies			20%	$3,355,800
23	Bonds and Insurance			3%	$1,677,900
24	***Total Capital Cost***				$84,315,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
25	Power	1	LS	$767,054.14	$767,054
26	Labor	1	LS	$204,000	$204,000
27	Equipment Repair & Replacement	1	LS	$194,211	$194,211
28	Contingency			30%	$349,600
29	***Total O&M Annual Cost***				$1,515,000

NOTES:
1. "Facility Life" selected based on 25-yr anticipated life of extraction wells.
2. "Interest Rate" selected within expected range for public-financing options.
3. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.

Project C-2: CSIP Expansion

Capital and Annualized Costs
Expanded Area Served by CSIP
(Preliminary Cost Estimate)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		9,900
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$73,366,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$5,739,400
7	Annual O&M Cost		$		$480,000
8	Total Annualized Cost		$		$6,219,400
9	Unit Cost		$/AF/yr.		**$630**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Pipeline	68,640	LF	$500	$34,320,000
11	Booster Pump System, 5 MGD	3	EA	$34,139	$102,400
12	Turnouts	26	EA	$2,500	$65,000
13	Booster Station	2	EA	$1,500,000	$3,000,000
14	HDD	800	LF	$750	$600,000
15	***Subtotal***				$38,087,400
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
16	Plumbing Appurtenance Contingency			30%	$11,426,200
17	General Conditions			15%	$5,713,100
18	Contractor Overhead and Profit			15%	$5,713,100
19	Sales Tax			8.75%	$999,800
20	Engineering, Legal, Admininstrative, Contingencies			30%	$11,426,200
21	***Total Capital Cost***				$73,366,000
OPERATIONS AND MAINTENANCE					
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
22	Distribution System Maintenance	3500	Acre	$138	$480,000
22	***Total O&M Annual Cost***				$480,000

NOTES:
1. "Project Yield" based on: avoided wet weather groundwater pumping based on historical puming records.
2. "Facility Life" selected based on 25-yr anticipated life .
3. "Interest Rate" selected within expected range for public-financing options.
4. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
5. "Unit Cost" estimate does not include unit cost for treatment components of project.

Project E-1: Multi-benefit stream channel improvements

Component 2

RCD Arundo Eradication Cost Estimate

Five-year cost for treating arundo (includes three herbicide treatments and mowing or hand-cutting if applicable)								
Work activity	Cost/acre for arundo control contractor	Cost/acre for biomonitoring	Cost/acre for biological surveys	Cost/acre for RCD program administration	Total Cost/acre	Estimated acres remaining	Total Cost (Low Estimate	Total Cost (High Estimate)
Mowed arundo	$ 10,350.00	$ 356.04	$ 2,127.50	$ 2,495.50	$ 15,329.04	700	$ 10,730,328.00	$ 13,949,426.40
Unmowed arundo	$ 7,475.00	$ 349.60	$ 1,322.50	$ 1,759.50	$ 10,906.60	150	$ 1,635,990.00	$ 2,126,787.00
Hand-cut arundo	$ 34,500.00	$ 2,300.00	$ 2,875.00	$ 3,737.50	$ 43,412.50	50	$ 2,170,625.00	$ 2,821,812.50
						Est. cost of initial + retreatment	**$ 14,536,943.00**	**$ 18,898,025.90**

Cost of O&M	
WCS completed treatment on approximately 21 river miles in 2020	$151,599.00
Cost per river mile of 2020 treatment	$7,219.00
Cost per river mile rounded up	$7,500.00
*Cost includes biological surveys and monitoring	
*90 miles of river in Monterey County	
Cost for retreating whole river 1 time	$675,000.00
Cost to re-treat equivalent of whole river five times over 25 years	$3,375,000.00
Cost of helicopter survey to re-map arundo over whole river	$400,000.00
RCD admin costs @ 20% of contractor cost	$755,000.00
Total cost for O&M	**$4,130,000.00**
Average annual cost (total cost/25 years)	**$165,200.00**

Capital and Annualized Costs

Multi-Benefit Stream Channel Improvement - Component 2 - Low Estimate

(Preliminary Cost Estimate)

SUMMARY					
Line No.	**Description**		**Units**		**Total**
1	Project Yield (high estimate)		acre-feet per year		20,880
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$14,536,943
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$1,100,000
7	Annual O&M Cost		$		$165,200
8	Total Annualized Cost		$		$1,265,200
9	Unit Cost		$/AFY		$60
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mowed arundo	700	Acres	$15,329	$10,730,328
11	Unmowed arundo	150	Acres	$10,907	$1,635,990
12	Hand-cut arundo	50	Acres	$43,413	$2,170,625
13	***Subtotal***				$14,536,943
OPERATIONS AND MAINTENANCE					
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
16	O&M Estmate	1	LS	$165,200	$165,200
17	***Total O&M Cost***				$165,200

NOTES:
1. "Project Yield" based on: Range of 6,000 to 36,000 AF, assumed an average of 20,000 AF
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" based on: Phase I and Phase II.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.
7. "Annual O&M Cost" estimate based on average annual needs for on going monitoring and maintenance (checmical treatment every 3 to 5 years).

Capital and Annualized Costs

Multi-Benefit Stream Channel Improvement - Component 2 - High Estimate

(Preliminary Cost Estimate)

SUMMARY					
Line No.	**Description**		**Units**		**Total**
1	Project Yield (low estimate)		acre-feet per year		2,790
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$18,898,026
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$1,500,000
7	Annual O&M Cost		$		$165,200
8	Total Annualized Cost		$		$1,665,200
9	Unit Cost		$/AFY		$600
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mowed arundo	700	Acres	$19,928	$13,949,426
11	Unmowed arundo	150	Acres	$14,179	$2,126,787
12	Hand-cut arundo	50	Acres	$56,436	$2,821,813
13	***Subtotal***				$18,898,026
OPERATIONS AND MAINTENANCE					
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
16	O&M Estmate	1	LS	$165,200	$165,200
17	***Total O&M Cost***				$165,200

NOTES:
1. "Project Yield" based on: Range of 6,000 to 36,000 AF, assumed an average of 20,000 AF
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" based on: Phase I and Phase II.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.
7. "Annual O&M Cost" estimate based on average annual needs for on going monitoring and maintenance (checmical treatment every 3 to 5 years).

Component 3

Capital and Annualized Costs
Multi-Benefit Stream Channel Improvements - Component 3
(Preliminary Opinion of Probable Cost)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		100
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$1,116,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$87,300
7	Annual O&M Cost		$		$6,000
8	Total Annualized Cost		$		$93,300
9	**Unit Cost**		$/AF		**$930**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	Mobilization/Demobilization	1	LS	$52,000	$52,000
11	Environmental and Stormwater	1	LS	$103,000	$103,000
12	Off-Stream Recharge Basin	8.5	AC	$48,500	$412,250
13	Land Acquisition	1	AC	$45,000	$45,000
14	*Subtotal*				$612,250
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
15	Construction Contingency			30%	$124,000
16	General Conditions			15%	$92,000
17	Contractor Overhead and Profit			15%	$92,000
18	Sales Tax			9.25%	$11,300
19	Engineering, Legal, Admininstrative, Contingencies			30%	$184,000
20	***Total Capital Cost***				$1,116,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
21	Detention Basin Maintenance	1	LS	$4,300	$4,300
22	Contingency			30%	$1,300
23	***Total O&M Cost***				$6,000

NOTES:
1. "Project Yield" based on: Assumed 100 acre-feet per year.
2. "Facility Life" selected based on 25-yr anticipated life of facilities.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" includes land acquisition costs estimated for an area equivalent to 10% of required recharge basin area. Recharge basin unit cost assumes inclusion of site civil earthwork and access road improvements. Environmental and stormwater requirements are estimate at 15% of capital base costs for off-stream basins.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annualized Capital Cost" based on facility life and interest rate.

Project E-2: Winter Releases from Reservoirs, with Aquifer Storage and Recovery in the 180/400-Foot Aquifer Subbasin

Capital and Annualized Costs
Winter Releases from Reservoirs, with Aquifer Storage and Recovery in the 180/400-Foot Aquifer Subbasin
(Preliminary Cost Estimate)

Line No.	Description		Units		Total
1	Project Yield		acre-feet per year		12,900
2	Facility Life		years		25
3	Interest Rate		%		6
4	Capital Cost		$		$172,141,000
5	Cost Recovery Factor		--		0.078
6	Annualized Capital Cost		$		$13,467,000
7	Annual O&M Cost		$		$5,223,000
8	Total Annualized Cost		$		$18,690,000
9	**Unit Cost**		$/AFY		**$1,450**
CAPITAL COSTS					
Line No.	**Capital**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
10	180' Aquifer ASR Well Construction	8	EA	$765,000	$6,120,000
11	400' Aquifer ASR Well Construction	8	EA	$1,530,000	$12,240,000
12	Well Pumps, Motors, & Wellhead Infrastructure	16	EA	$440,000	$7,040,000
13	Electrical and Instrumentation	1	LS	$1,056,000	$1,056,000
14	Percolation Basins, Site Civil Work	16	25%	$191,300	$3,060,800
15	Land Access	21	AC	$45,000	$945,000
16	Distribution Pipeline (4 mile)	21,120	LF	$650	$13,728,000
17	Filtration and Disinfection System	1	LS	$70,000,000	$70,000,000
18	***SubTotal***				$114,189,800
Line No.	**Markups**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
19	General Conditions			15%	$17,128,500
20	Contractor Overhead and Profit			18%	$20,554,200
21	Sales Tax			8.75%	$9,991,600
22	Engineering, Legal, Admininstrative, Contingencies			20%	$6,851,400
23	Bonds and Insurance			3%	$3,425,700
24	***Total Capital Cost***				$172,141,000
OPERATIONS AND MAINTENANCE					
Line No.	**Description**	**Quantity**	**Unit**	**Unit Cost**	**Total Cost**
25	Power	1	LS	$1,607,300	$1,607,300
26	Treatment	1	LS	$548,000	$548,000
27	Equipment Repair & Replacement	1	LS	$864,000	$864,000
28	Operations Labor	1	LS	$729,600	$729,600
29	Miscellaneous	1	LS	$603,900	$603,900
30	Contingency			20%	$870,600
31	***Total O&M Annual Cost***				$5,223,000

NOTES:
1. "Project Yield" based on: 49 CFS (22,000 GPM) and 36% facility up time, reflecting winter operation.
2. "Facility Life" selected based on 25-yr anticipated life of extraction wells.
3. "Interest Rate" selected within expected range for public-financing options.
4. "Capital Cost" based on: construction of 8 ASR wells in the180-Foot Aquifer, 8 ASR wells in the 400-Foot Aquifer. Constrcution of a 23 MGD filtration/disinfection system for treating winter surface water flows prior to injection.
5. "Cost Recovery Factor" based on anticipated Facility Life and Interest Rate.
6. "Annual O&M Cost" includes well and treatment facilities.

Chapter 9
Appendix 9-B

MCWRA Drought - Technical Advisory Committee

Drought Operations Technical Advisory Committee

Standards and Guiding Principles of Reservoir Operations During Drought Conditions

This document provides a foundation of standards and guiding principles to be used in the development of a proposed reservoir release schedule triggered under specific, seasonally defined conditions.

Standards: a level of quality or achievement that is considered acceptable or desirable.
Standards are in place to ensure that basic needs are met by partners through clearly defined behaviors that are acceptable. The drought operations technical advisory committee will strive to have attainable standards.

Guiding Principles: guide an organization towards its goals.
Guiding Principles are in place to ensure we continue to move toward our goals with flexibility and unity of effort.

Introduction

Prior to being formally established in 1991, the Monterey County Water Resources Agency (MCWRA) was the Monterey County Flood Control and Water Conservation District, established in 1947 and organized as a division of the Public Works Department of the County of Monterey. MCWRA provides services related to the control of flood and storm waters in Monterey County, conservation, protection of water quality, reclamation of water and the exchange of water. MCWRA is a public agency created by the State of California pursuant to the Monterey County Water Resources Agency Act (California Water Code, Appendix 52).

MCWRA owns and operates two dams along with associated reservoirs. Nacimiento Dam is on the Nacimiento River, a tributary to the Salinas River. Nacimiento Dam is approximately 12.3 river miles upstream of its confluence with the Salinas River and forms the Nacimiento Reservoir, with a maximum storage capacity of approximately 377,900 acre-feet. San Antonio Dam, on the San Antonio River is approximately 8.6 river miles upstream of its confluence with the Salinas River. San Antonio Dam forms the San Antonio Reservoir, with a maximum storage capacity of approximately 335,000 acre-feet of water. The Nacimiento and San Antonio Rivers enter the Salinas River at river miles 108 and 104, respectively, from its mouth at the Pacific Ocean in Monterey Bay.

The purpose of the Drought Operations Technical Advisory Committee (D-TAC) is to provide, when drought triggers occur, technical input and advice regarding the operations of Nacimiento and San Antonio Reservoirs. This document was developed by the members of the D-TAC to

provide a foundation of Standards and Guiding Principles to be used in the development of a proposed reservoir release schedule triggered under specific, seasonally defined conditions.
A Habitat Conservation Plan (HCP) is currently being developed to address the effects of reservoir operations and other actions on Federally endangered species and will further address drought operations in the Salinas River system. Documents and procedures developed by the D-TAC will be considered during development of the HCP. MCWRA will convene with stakeholders to determine if modifications to these drought procedures are warranted in light of the terms of the final HCP. Drought operations developed by the D-TAC will also consider management actions and sustainability criteria within the Groundwater Sustainability Plans for the Salinas Valley groundwater basin.

Formation of the D-TAC

The D-TAC was formed through a settlement agreement (Appendix A) to develop Standards and Guiding Principles and proposed reservoir release schedules for MCWRA drought operations. The D-TAC is an ad hoc committee of independent third-party experts with expertise in any of the following fields: hydrology, hydrogeology, hydrologic modeling, civil engineering, ecology, or fish and wildlife biology. The experts are retained and paid for, but not employed by any interested person or organization. The U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, State Water Resources Control Board, Salinas Valley Basin Groundwater Sustainability Agency and the Monterey County Water Resources Agency are using in-house staff as D-TAC members. Each time a Drought Trigger occurs, the chair of the D-TAC shall rotate, in alphabetical order, by the name of the organization D-TAC members represent. Organizations with multiple members will only have one-person chair in the rotation.

D-TAC Members (ordered alphabetically by organization):

- Donald Baldwin, Environmental Scientist, - California Department of Fish and Wildlife
- Dennis Michniuk, District Biologist Coastal Fisheries - California Department of Fish and Wildlife
- Robert Abrams, PhD, PG, CHg – Grower-Shipper Association
- William Stevens, Natural Resource Management Specialist - National Marine Fisheries Service
- Shaunna Murray, Senior Water Resources Engineer – Monterey County Water Resources Agency
- Germán Criollo, PE, Associate Hydrologist – Monterey County Water Resources Agency
- Jason Demers, Associate Engineer – Monterey County Water Resources Agency
- Emily Gardner, Dep. General Manager – Salinas Valley Basin Groundwater Sustainability Agency
- Curtis Weeks, PE, - Salinas Valley Water Coalition
- Mark Ogonowski, Senior Fish and Wildlife Biologist – U.S. Fish and Wildlife Service

Facilitation and Support:

- Howard Franklin, PG, Senior Hydrologist – Monterey County Water Resources Agency
- Nicole Koerth, GIT, Hydrologist – Monterey County Water Resources Agency

D-TAC Triggers

Drought Triggers, or reservoir storage thresholds for when the D-TAC shall meet to develop a release schedule, are defined in Exhibit B of the Settlement Agreement (Appendix A). These triggers are based on operational considerations and not water year type. The storage thresholds defined assume that MCWRA can make conservation releases to the Salinas River Diversion Facility (SRDF) for two months and maintain minimum releases until September.

A Drought Trigger occurs if the following criteria is met:

- At the October Reservoir Operations Advisory Committee meeting of each year, MCWRA staff will present an updated reservoir release schedule and the then-current forecast for December 1st storage at Nacimiento and San Antonio Reservoirs. If the December 1st forecasted combined reservoir storage volume at Nacimiento and San Antonio Reservoirs is below 220,000 acre-feet and the San Antonio Reservoir's December 1st forecasted storage is below 82,000 acre-feet, the D-TAC process shall commence.
- The MCWRA will schedule the first D-TAC meeting to occur no earlier than February 15th and the D-TAC will meet as needed through March 31st. The D-TAC will develop a recommended release schedule that is consistent with the Standards and Guiding Principles.
- If at any time between December 1st and March 31st the actual reservoir storage volumes equals or exceeds the combined or individual minimum storage thresholds, the D-TAC process will terminate, and no release schedule will be prepared by the D-TAC.

Standards:

- The proposed reservoir release operations schedule triggered under specific, seasonally defined conditions of drought will be developed based on the best available scientific knowledge, data, and understanding of the environmental biology, hydrology and hydrogeology of the Salinas Valley; under the technical expertise of the members of the D-TAC.
- The proposed reservoir release schedule will be implemented based on specific tools and templates made available to the D-TAC. These are discussed further in the Implementation Procedures section.
- The proposed reservoir release schedule will acknowledge, address, and balance the water needs of various stakeholders for limited resources during a drought.

Guiding Principles:

- MCWRA is a public agency charged with the long-term management of water resources in the Salinas Valley and is also the flood control agency for Monterey County. Therefore, any releases of water from Nacimiento or San Antonio Reservoirs will be made with consideration given first to safety, including flow conditions and the structural integrity of Nacimiento and San Antonio Dams.
- MCWRA operates Nacimiento and San Antonio Reservoirs under regulatory authorizations; as well as through legal agreements (Appendix C).
- Any reservoir release schedule developed by the D-TAC should:
  - When conservation releases are made, maintain geographic equity to fullest extent possible;
  - Comply with applicable regulations and agreements relating to the operation of Nacimiento and San Antonio Reservoirs;
  - Avoid, to the extent possible, consecutive years where only minimum releases are made from the reservoirs;
  - Avoid, to the extent possible, adverse effects to native species and their habitats;
  - Safely use existing MCWRA infrastructure while balancing water availability and use; and
  - Avoid, to the extent possible, adverse impacts to valley-wide agricultural operations.

Implementation Procedures:

- The D-TAC will use a MCWRA provided template when developing the release schedule. The specific actions will also be described in a narrative form to expound upon the actions taken for each month shown in the release schedule.
- The release schedule will be developed for April through December of the current year. If significant inflow occurs during this period, then modifications to the release schedule will be made through existing MCWRA protocols.
- The D-TAC will develop a dry winter scenario narrative for the following January- March period to allow for the possibility of multiple dry winter release operations.
- The reservoir release schedule includes estimated values for demands, releases and associated reservoir elevations and storage volumes. It serves as a guideline for reservoir operations. Actual operations will require the flexibility to respond to current hydrologic and facility conditions.
- The release schedule will be updated on a monthly basis for discussion at the Reservoir Operations Committee.
- Reservoir releases will be made under direction of the MCWRA Board of Directors or Board of Supervisors through the adoption of a reservoir release schedule or dry winter release priorities, to be executed by MCWRA staff.

Summary Actions

The Standards and Guiding Principles Document and any recommended release schedule prepared by the D-TAC will first be received by the Reservoir Operations Advisory Committee. The Reservoir Operations Advisory Committee will meet to discuss the Standards and Guiding Principles or release schedule and will solicit information, data and public comment regarding appropriate MCWRA operations during droughts. Following receipt of public input regarding the Standards and Guiding Principles or any subsequent release schedule, the Reservoir Operations Advisory Committee will then prepare a written recommendation regarding reservoir operations which will be transmitted to the MCWRA Board of Directors for consideration and action. Any interested party that dissents from the Reservoir Operations Committee's recommendation may submit separate written comments to the MCWRA Board of Directors. The MCWRA Board of Directors will determine, in accordance with applicable law, whether MCWRA will adopt and implement the Standards and Guiding Principles or release schedule, provided the MCWRA General Manager may, in his sole discretion, refer the question of whether MCWRA should adopt and implement the Standards and Guiding Principles or a release schedule to the MCWRA Board of Supervisors for final determination. In the event the MCWRA General Manager elects not to refer the question of adoption and implementation of Standards and Guiding Principles or a release schedule to the MCWRA Board of Supervisors, the decision of the MCWRA Board of Directors regarding such questions shall constitute final agency action for all purposes. The MCWRA Board of Directors (or MCWRA Board of Supervisors, if applicable) will retain full discretion and authority to accept or reject, in whole or in part, the written recommendations of the Reservoir Operations Advisory Committee.

APPENDICES

Appendix A: *Settlement Agreement Between Monterey County Water Resources Agency, The Agency Board of Supervisors, the Agency Board of Directors, the County of Monterey, the County Board of Supervisors, and the Salinas Valley Water Coalition; November 15, 2019*

- https://www.co.monterey.ca.us/Home/ShowDocument?id=98911

Documents referenced in Exhibit B of the Settlement Agreement

- *Salinas Valley Water Project, Engineer's Report, January 2003*
  - https://www.co.monterey.ca.us/home/showdocument?id=24202
- *Final Environmental Impact Report/Environmental Impact Statement for the Salinas Valley Water Project*
  - *Draft, June 2001:* https://www.co.monterey.ca.us/home/showdocument?id=24180
  - *Final Volume 1, April 2002:* https://www.co.monterey.ca.us/home/showdocument?id=24186
  - *Final Volume 2, April 2002:* https://www.co.monterey.ca.us/home/showdocument?id=24188
- *Salinas Valley Water Project EIR Addendum, July 17, 2007*
  - https://www.co.monterey.ca.us/home/showpublisheddocument?id=98572

Appendix B: *Definition of Terms*

Appendix C: *Monterey County Water Resources Agency's Water Rights and Agreements*

Appendix B: Definition of Terms

Adult Steelhead Upstream Migration Releases – Reservoir releases made to facilitate upstream migration of adult steelhead between February 1st- March 31st, when triggers are met. If the 1) combined storage of Nacimiento and San Antonio reservoirs is greater than 220,000 AF, 2) 340 cfs or higher flows are present at the Arroyo Seco near Soledad gage (USGS streamflow gage 11152000), and 3) 173 cfs or higher flows are present at the Arroyo Seco below the Reliz Creek gage (USGS streamflow gage 11152050), MCWRA will provide flows of at least 260 cfs at the Salinas River near Chualar (USGS streamflow gage 11152300) for five or more consecutive days, when the river mouth is open to the ocean.

Block Flow Releases – Reservoir releases made to facilitate the downstream migration of smolts and rearing juvenile steelhead in the Salinas River beginning March 15th in normal-category type years. The following triggers must be meet for releases to be made 1) water year type is dry-normal, normal or wet-normal, 2) combined storage of Nacimiento and San Antonio reservoirs is 150,000 AF or more on March 15th, and 3) 125 cfs or higher at the Nacimiento River below Sapaque Creek gage (USGS streamflow gage 111489000) or 70 cfs at the Arroyo Seco below Reliz Creek gage (USGS streamflow gage 11152050). Amount and duration of block flow depends on when the flows are triggered.

Conservation Pool – Water in reservoirs used for groundwater recharge, operation of the Salinas River Diversion Facility, water supply, fish migration, and fish habitat requirements. Volume of 289,013 acre-feet between 687.8 feet and 787.75 feet in Nacimiento Reservoir and volume of 282,000 acre-feet between 666 feet and 774.5 feet in San Antonio Reservoir.

Conservation Releases – Water discharged for the purpose of recharging the groundwater basin.

Dead Pool – The storage between the bottom of the reservoir and elevation 670 feet for Nacimiento Reservoir, the invert of the intake structure of the low-level outlet works, and elevation 645 feet for San Antonio Reservoir, the invert of the intake structure of the outlet works. The volume of the Dead Pool is 10,300 acre-feet in Nacimiento Reservoir and 10,000 acre-feet in San Antonio Reservoir. Water cannot flow out by gravity out of Nacimiento Reservoir below 670 feet elevation and out of San Antonio below 645 feet elevation.

Downstream Migration of Juvenile Steelhead and Kelts Releases – Reservoir releases and SRDF bypass flows made to enhance migration opportunities for juvenile steelhead and post-spawn adult steelhead (kelts) made in years when block flow releases for smolt migration don't occur by April 1st.

Dry Year – Water year in which unimpaired annual mean flow at the USGS streamgage on the Arroyo Seco near Soledad (USGS streamgage 11152000) falls in the 75-100% percentile of mean annual flows ranked in descending order (as defined in the Salinas Valley Water Project Flow Prescription for Steelhead Trout in the Salinas River).

Environmental Compliance – Conforming to any environmental regulatory requirements currently imposed or those that become imposed in the future.

Flood Pool – Water used to temporarily store flood water during the winter. Volume of 66,587 acre-feet between 787.75 feet and 800 feet in Nacimiento Reservoir and volume of 30,000 acre-feet between 774.5 feet and 780 feet in San Antonio Reservoir.

Maximum Reservoir Elevation – Maximum reservoir elevation that can be sustained, and the level at which the reservoir is considered full. Elevation of 800 feet in Nacimiento Reservoir and 780 feet in San Antonio Reservoir.

Minimum Releases – Reservoir releases made to provide steelhead spawning and rearing habitat flows. Minimum releases are 60 cfs from Nacimiento Dam as long as the water surface elevation of Nacimiento Reservoir is above 687.8 feet, and 10 cfs from San Antonio Dam as long as the water surface elevation of San Antonio Reservoir is above 666 feet.

Minimum Pool – The storage above Dead Pool and below Conservation Pool. This is between elevation 670 feet and 687.8 feet in Nacimiento Reservoir. The volume of this pool is 12,000 acre-feet which is reserved for use by the County of San Luis Obispo per the 1959 San Luis Obispo County Agreement. In San Antonio Reservoir, minimum pool is between elevation 670 feet and 687.7 feet, with a volume of 12,000 acre-feet.

Minimum Recreation Elevation – Lowest Nacimiento Reservoir elevation at which most of the boat ramps around the reservoir are useable and which most private property owners have access to the reservoir.

Natural Flow – Water that would exist in a stream at a given point in time in the absence of human activity *(Source: https://www.waterboards.ca.gov/waterrights/board_info/faqs.html)*

NWP Intake Elevation – Lowest Nacimiento Reservoir elevation at which San Luis Obispo County can take water through the Nacimiento Water Project. Elevation of 670 feet.

Operations Ratio – The ratio of empty space in the conservation pools of San Antonio and Nacimiento Reservoirs, with Nacimiento as the numerator. Historically, this ratio was defined as 3 to 1, and reservoir releases were made in such a manner that the ratio was reached prior to halting releases at onset of the rainy season.

Salinas River Diversion Facility (SRDF) – A component of the Salinas Valley Water Project that consists of an inflatable Obermeyer dam and a river intake structure to provide treated river water to growers within the Castroville Seawater Intrusion Project service area. This facility is located approximately 5 river miles upstream of the mouth of the Salinas River.

Salinas Valley Water Project (SVWP) – A project developed by MCWRA and Salinas Valley interests that consists of the modifications of the spillway at Nacimiento Dam and the construction of the Salinas River Diversion Facility, near the city of Marina. The goals of the project are to help stop seawater intrusion, improve flood control, recharge Salinas Valley groundwater, and improve conditions for steelhead trout.

Top of Dam – The dam crest. Elevation of 825 feet at Nacimiento Dam and 802 feet at San Antonio Dam.

Water Year – The 12-month period from October 1st through September 30th. The water year is designated by the calendar year in which it ends, and which included 9 out of the 12 months. For examples, the year ending on September 30th, 1959 is called “1959 water year”.

Water Year Type – Determination of water year type (e.g. dry, normal, wet) is made based on unimpaired annual mean flows at the USGS streamgage on the Arroyo Seco near Soledad (USGS Streamgage 11152000). Annual mean flows are ranked in descending order and stream flow corresponding to the 25th and 75th percentile are selected as the thresholds. Wet years are defined as flows below the 25th percentile, Normal years between the 25th and 75th percentile, and Dry years above the 75th percentile. Year type determinations are made on March 15th (preliminary) and April 1st (official) of each year. (as defined in the Salinas Valley Water Project Flow Prescription for Steelhead Trout in the Salinas River).

Appendix C: Monterey County Water Resources Agency's Water Rights and Agreements

Nacimiento Reservoir

Water Rights License 7543 – License for Diversion and Use of Water, No. 7543, from the California State Water Resources Control Board, was issued November 4, 1965.

This license was last amended September 5, 2008 to specify that the place of use of water from this license changed to include 421,435 acres of land comprising MCWRA's Zone 2C assessment zone, to add a point of rediversion at the Salinas River Diversion Facility (SRDF), and to add fish flow requirements that were consistent with the June 21, 2007, National Marine Fisheries Service (NMFS) biological opinion issued to the U.S. Army Corps of Engineers (biological opinion).

License No. 7543 gives MCWRA the right to store 350,000 AF from October 1 of each year to July 1 of the succeeding year and to withdraw a maximum of 180,000 AF per year. The purpose of use are for irrigation, domestic, municipal, industrial, and recreational uses. *Documents for this can be found in Appendix B of the Nacimiento Dam Operation Policy: https://www.co.monterey.ca.us/Home/ShowDocument?id=63151*

Water Rights Permit 21089 – Permit for Diversion and Use of Water, No. 21089, from the California State Water Resources Control Board, was issued March 23, 2001. This permit was last amended September 5, 2008, to specify that the place of use of water from this license changed to include 421,435 acres of land comprising MCWRA's Zone 2C assessment zone, to add a point of rediversion at the SRDF, and to add fish flow requirements that were consistent with the NMFS biological opinion.

The original reservoir volume computations submitted and subsequently approved in License No. 7543, were based on United States Geological Survey (USGS) Quad sheets from the 1940s. In the early 1990s, aerial surveys with increased accuracy showed that the actual volume of Nacimiento Reservoir was greater than the 350,000 AF in License 7543. In order to correct this discrepancy, MCWRA filed water rights Application No. 30532. Nacimiento Dam has never been modified in any way to increase storage and the reservoir volume is unchanged from the time of the dam's construction, with the exception of the inflow of silt from natural runoff which has decreased storage volume.

As a result of this application, MCWRA has a permit to collect to storage 27,900 AF per annum from October 1 of each year to July 1 of the succeeding year. The total quantity of water collected to storage under this permit and License 7543 shall not exceed 377,900 AF per year.

Documents for this can be found in Appendix B of the Nacimiento Dam Operation Policy: https://www.co.monterey.ca.us/Home/ShowDocument?id=63151

Water Rights Permit 19940 – Permit for Diversion and Use of Water, No. 19940, from the California State Water Resources Control Board, was issued December 31, 1986. Permit 19940 gives MCWRA the right to divert up to 500 cfs through the Hydroelectric Plant from January 1 to December 31 of each year for irrigation, domestic, municipal, industrial and recreational uses. Diversion under this permit is incidental to releases being made for other purposes.

Documents for this can be found in Appendix B of the Nacimiento Dam Operation Policy: https://www.co.monterey.ca.us/Home/ShowDocument?id=63151

San Luis Obispo County Agreement – MCWRA's Water Rights License No. 7543 is subject to an agreement between MCWRA and SLO District which gives SLO District the right to use 17,500 AF of water annually from Nacimiento Reservoir. The SLO District Board has adopted a policy designating a portion of the total, approximately 1,750 acre-feet per year (AFY), for use around Nacimiento Reservoir; Heritage Ranch Community Services District (HRCSD) has agreements with SLO District which collectively entitle HRCSD to use 889 AFY of the 1,750 AFY; pursuant to these agreements, HRCSD takes its allotment from a well gallery in the Nacimiento River downstream of the Dam. SLO District can use up to the remaining 15,750 AF per water year through the NWP. The agreement also provides that MCWRA shall not make conservation releases during the water year that result in a reservoir elevation below 687.8 feet on September 30 of each year in order to assure SLO District of its rights and entitlements to water under the terms of the agreement (i.e. in order to assure the maintenance of a minimum storage pool of 12,000 AF above the present low-level outlet works for SLO District use). The original agreement is dated October 19, 1959, and it has been amended six different times in 1959, 1967, 1970, 1977, 1988, and 2007. These documents are collectively referred to as the SLO County Agreement.
Documents for this can be found in Appendix C of the Nacimiento Dam Operation Policy: https://www.co.monterey.ca.us/Home/ShowDocument?id=63151

Nacimiento Water Company Agreement – The 1984 agreement with MCWRA allows the Nacimiento Water Company a water allocation of up to 600 AF per year to be extracted from wells within the floodage easement of Nacimiento Reservoir. The Nacimiento Water Company shall pay MCWRA quarterly for water from the allocation on the basis of AF used at a rate determined by this agreement.
Documents for this can be found in Appendix D of the Nacimiento Dam Operation Policy: https://www.co.monterey.ca.us/Home/ShowDocument?id=63151

San Antonio Reservoir

Water Rights License 12624 - License for Diversion and Use of Water, No. 12624, from the California State Water Resources Control Board, was issued December 2, 1965 and amended April 22, 1990. This license was most recently amended September 5, 2008 to specify that the place of use of water from this license changed to include 421,435 acres of land comprising MCWRA's Zone 2C assessment zone, to add a point of rediversion at the SRDF, and to add fish flow requirements consistent with the June 21, 2007, National Marine Fisheries Service BO.

License No. 12624 gives MCWRA the right to store 220,000 AF from October 1 of each year to July 1 of the succeeding year and to withdraw a maximum of 210,000 AF per year for municipal, domestic, industrial, irrigation, and recreational uses.

The amended license can be found on the CA State Water Resources Control Board website: https://www.waterboards.ca.gov/waterrights/board_decisions/adopted_orders/orders/2008/wro2008_0037dwr.pdf