

## MEMORANDUM

**DATE:** June 30, 2021  
**TO:** **Community Water Center (CWC)**  
Justine Massey, JD  
Mayra Hernandez  
**FROM:** **Pajaro Valley Water Management Agency (PV Water)**  
Brian Lockwood, General Manager  
**CC:** GSU22 Committee  
**RE:** **RESPONSE TO CWC LETTER (June 18, 2021)**  
**Regarding Comments on Groundwater Levels Sustainable Management Criteria**

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We want to thank the CWC for participating in the Basin Management Plan: Groundwater Sustainability Update 2022 (GSU22) process. We received your letter, dated June 18, 2021, offering comments and recommendations regarding the sustainable management criteria (SMC) for chronic lowering of groundwater levels (GWL) that were approved by the GSU22 Committee for recommendation to the PV Water Board of Directors at Meeting #8 on May 13, 2021. We will forward your letter to the GSU22 Committee in advance of Meeting #10 on July 8, 2021 to inform the Committee of the comments and recommendations provided.

We welcome the CWC's offer to present on the Framework for a Drinking Water Well Mitigation Program (2020), and will reserve 15 minutes for a presentation followed by an opportunity for questions and comments at the next GSU22 Committee Meeting on July 8, 2021 during the public comment period for items not on the agenda. In the following, please find our responses to the comments provided in your letter:

- **Conduct a domestic well impact analysis to determine potential impacts of setting the GWL SMC at 2015 levels.** The GWL minimum thresholds are proposed at the average of the two lowest annual minimum groundwater elevations from water year 2000-2020. At most representative monitoring points, the proposed GWL minimum thresholds are lower than what was observed in 2015. The technical memorandum on *Development of Sustainable Management Criteria for Chronic Lowering of Groundwater Levels*, dated April 2, 2021, performed a domestic well analysis by comparing these minimum thresholds to screen intervals of nearby domestic wells as discussed in further detail below. Any impacts observed in 2015 were not related to 2015 groundwater levels in the Basin being lower than previous years as shown in both groundwater levels at representative monitoring points and monitoring of nearby private wells (Appendix B of the technical memorandum). Minimum thresholds are based on groundwater elevations since 2000 because groundwater elevations have generally risen since the 1990s. The minimum thresholds represent a range of groundwater levels in the Basin that has supported groundwater supply over 20 years.

The referenced well depth analysis described in Appendix C of the technical memorandum only includes wells screened in the Aromas Red Sands because the Aromas Red Sands is the principal aquifer identified in PV Water's Alternative submittal approved by the Department of Water Resources (DWR). Well screens in both the shallower alluvium and deeper Purisima Formation are excluded from the analysis. The principal aquifer is the focus of management under SGMA and SMC only need to be set for the principal aquifer.

- **Revisit the residents' petition & GWL SMCs in the Advisory Committee.** We are sorry to learn that Ms. Anderson had technical difficulties beyond those we were aware of and worked through during the May 13 meeting. The facilitator paused the meeting while she worked through her technical difficulties to be able to provide comment at which point her comments, including points from the petition, and our responses carried forth for the next 15 minutes. Ms. Anderson shared and Ms. Cross confirmed that she had no additional comments. Upon a review of the [video recording](#), our team did not observe a request from Ms. Suchil for more information or any issues limiting Ms. Anderson's ability to communicate with the Committee beyond the difficulties noted above. The petitions from Rural Residents for Water and correspondence from Ms. Anderson, upon her request, were provided to the GSU22 Committee prior to the approval of the GWL SMC. At every meeting, time is allocated for comments on items not on the agenda and this would be the appropriate time for Ms. Anderson to elaborate upon the petition and materials previously provided to the Committee.

Web platform meetings are certainly not ideal but we are committed to having all participants including the public, participate fully during the GSU22 Committee meetings. PV Staff are on hand to accommodate all participants and provide troubleshooting should that be a factor in the future. In addition, as we commit in the [Communication and Engagement Plan](#), we invite all participants to attend and reach out to PV Staff and Consultants in between our GSU Meetings to provide better understanding of the content and address any questions should the meeting be inadequate to fully address all concerns. During this process, PV Staff and Consultants have responded to a number of inquiries from Committee Members and the public including Ms. Anderson and other rural residents.

PV Water on multiple occasions via email and during GSU Meetings #8 (May 13th) and #9 (June 10th), invited the Rural Residents to participate in a summer meeting to specifically address groundwater sustainability concerns as stated in the May 11th petition and during the last two prior meetings. To date we have had not received acceptance of this invitation. At Meetings #8 and 9, we also provided opportunity for Ms. Anderson and Mr. Castillo to present the petitioners concerns and provided a time for Committee and public comment and question period during Agenda Item Introduction / Received Correspondence as well as during the GSU Development / GWLs Discussion. During the Questions/Comments period Ms. Anderson did not provide additional information nor were there further questions or comments from the Committee. As part of the GSU22 process, after each SMC, we provide a GSU22 Committee roll call vote for recommendation to the PV Water Board. There were two roll call votes on GWL that were passed favorably including the GWL SMC that received 13 affirmatives with one no vote by *Agricultural Representative* Thorlakson and the

recommendation on GWL measurable objectives and interim milestones were unanimously passed.

- **Include a summary of the concerns raised by the residents' petition in the GSU22 Committee's report to the PV-Water Board; recommend that the Board hear this information directly in its next session.** The PV Water Board of Directors received the Rural Residents for Water petition as part of the Board Packet on May 19, 2021 and the GSU22 Committee received it in advance of the GSU22 May 13 meeting when the GWL SMC were voted on and approved. We welcome all comments by the GSU22 Committee as well as the public when these recommendations will be considered for approval by the Board of Directors at the July 21 meeting.

- *In particular, Committee Member Anderson's presentation raises the issue of approximately 90% of domestic wells anticipated to go dry based on proposed GW levels. (Slide 2)* This percentage is not what slide 2 of Ms. Anderson's presentation states nor what was presented in technical memorandums. Slide 2 states "PV Water's proposed minimum groundwater is set at a level that could allow as many as 10% of domestic wells to fail." PV Water had expressed concern over inaccuracies and misrepresentations Ms. Anderson included in her presentation in an email to her on April 7 and requested that she provide the materials prepared for the GSU22 Committee to interested parties. Ms. Anderson's statement is not accurate in that the evaluation is based on groundwater levels compared to top of well screens, which is not the level at which wells go dry or fail. Although wells and well supply can be affected when groundwater drops below the top of well screens, domestic wells commonly operate with water levels below the top of well screen. The well depth analysis was conducted for the purpose of developing a data driven understanding of the well screen depths in the Aromas aquifer and was used to support the development of minimum thresholds designed to prevent significant and unreasonable impacts to wells, such as dewatering of screens or going dry. The well depth analysis is described in the April 2, 2021 draft technical memorandum titled [Development of Sustainable Management Criteria for Chronic Lowering of Groundwater Level](#) and accurately characterizes the analysis and development of the GWL SMC.

In addition, the GSU22 team presented an updated evaluation at the May meeting (slide 24) to compare proposed with 95<sup>th</sup> percentile of top of nearby well screens, which shows that minimum thresholds are above the 95<sup>th</sup> percentile of top of nearby well screens at most representative monitoring points (RMPs). Ms. Anderson has also expressed concern about the RMPs where minimum thresholds are not above the 95<sup>th</sup> percentile. The updated evaluation showed these RMPs are located in areas where land surface, screens, and groundwater levels vary greatly. The MT for these RMPs are appropriate as they maintain the relatively stable groundwater levels observed historically. The full updated evaluation is provided in the May update to Appendix D for the technical memorandum on *Development of Sustainable Management Criteria for Chronic Lowering of Groundwater Levels*.

- *Additionally, Committee Member Anderson's presentation raises the question of significant geographic data gaps. (Slide 9)*

In the April 2 memo *Development of Sustainable Management Criteria for Chronic Lower of Groundwater Level* and in the presentation of the April 8th GSU22 meeting, data gaps in the proposed GWL SMC monitoring network were acknowledged. Feedback on the data gaps received for the April 8th GSU22 meeting will also be considered in development of the monitoring plan for the Basin scheduled for presentation at the August 12<sup>th</sup> GSU22 meeting. These data gaps are based on the wells that can be utilized as representative monitoring points for establishing SMC and reporting to DWR and do not reflect the spatial extent of the more than 175 wells that PV Water routinely collect data from. To address data gaps in the GWL SMC network, PV Water will be collaborating with water purveyors in the basin, have conducted outreach efforts to small water systems, and will be installing new dedicated monitoring wells.

- **Instead of dismissing Committee Member Anderson’s well’s status, the Committee should investigate further to ensure that other wells are not having similar problems with chloride, and address the issue (at a minimum preventing it from worsening) if found to be impacting beneficial users.** Ms. Anderson’s well status was not dismissed. However, we have not been provided any data demonstrating that her well has elevated chloride concentrations. The maximum chloride concentrations inland of estimated seawater intrusion are currently less than 155 mg/L, which is lower than the secondary drinking water standard for chloride (see Figure 1 of the March 9, 2021 TM on *Proposed Sustainable Management Criteria for Seawater Intrusion*). The data also show that these observed chlorides are geographically disconnected from seawater intrusion. We appreciate Ms. Anderson’s agreement to include her well in PV Water semiannual monitoring program. The depth to water elevation measured at her well is similar to the elevation when the well was drilled and is above sea level.

In its approval of PV Water’s Alternative submittal, DWR accepted PV Water’s use of available assimilative capacity estimated in the Salt and Nutrient Management Plan as minimum thresholds for groundwater quality with a measurable objective of no further reduction in assimilative capacity. The use of assimilative capacity is consistent with the statement that “SGMA is meant to set the requirements for the overall basin.” As described in the Salt and Nutrient Management Plan, variability at specific locations across the Basin is typical due to both natural and anthropogenic sources for constituents so there are wells in the Basin that exceed water quality objectives.

- **Develop and implement a Robust Drinking Water Well Mitigation Program.** The GWL SMC minimum thresholds are designed to be protective of significant and unreasonable impacts to beneficial users. As stated above, we will allocate time for the CWC at GSU22 Meeting #10 on July 8 to present its Well Impact Mitigation Framework to the GSU22 Committee.