

# Attachment D

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Commenter	Comment Number	Comment	Response
Clark Colony Water Company Letter dated 08/26/24	1 of 2	The SVGB Report's analysis improperly combines the Arroyo Seco Management Area with the rest of the Forebay Subbasin.	See responses to comments October 2024 letters from the Arroyo Seco Groundwater Sustainability Agency and Clark Colony Water Company.
Clark Colony Water Company Letter dated 08/26/24	2 of 2	The Report contains inaccurate information related to annual CCWC water diversions.	The difference in data is noted and model input data will be confirmed for future applications.
Monterey County Farm Bureau, Salinas Basin Water Alliance, and Salinas Valley Water Coalition Letter dated 08/30/2024	1 of 1	No specific comments were provided in the letter requiring a response from the County.	This letter was directed to the Salinas Valley Basin Groundwater Sustainability Agency, with a copy sent to the County. County staff acknowledge receipt of the letter.
Salinas Basin Water Alliance Letter dated 08/27/2024	1 of 1	The Alliance believes to be consistent with [SGMA], the County should defer all water-related issues found in the Groundwater Investigation Report to the two County water agencies who are, and will continue to be, the best venue for overseeing and managing the County's groundwater resources, including developing technical information and implementing measures required to sustainably manage the County's groundwater supply. <i>[Ed. note - Refer to original letter for additional comments similar to the selected one identified here.]</i>	County staff acknowledge receipt of the letter from the SBWA and anticipate collaborating with Groundwater Sustainability Agencies and other entities with water management and/or land use authority to establish protocols and ensure that land use planning and efforts to achieve groundwater sustainability are complementary.
Salinas Valley Water Coalition Letter dated 08/26/2024	1 of 3	The Coalition respectfully requests that more time be allowed to review and comment on the Salinas Valley Groundwater Basin Investigation Report and related materials for agenda item No. 12 before they are formally received by the County's Board of Supervisors.	Additional time for review and comment on the Investigation Report was provided.
Salinas Valley Water Coalition Letter dated 08/26/2024	2 of 3	The Report makes factual findings, or assumptions, that are misleading and should be corrected before the Report is formally received. For example, the Report states that "agricultural water demands were greater than projected in the EIR," citing 431,300 acre feet (AF) of agricultural water demand as the 1995 baseline compared to 447,000 AF of agricultural water demand in 2017. The Report then relies on 2017 data to describe baseline groundwater pumping levels, stating that 2017 baseline agricultural pumping is 432,036 AF. Although the Coalition agrees with the Report's finding that overall "agricultural groundwater pumping has remained relatively stable over time," the most current data from 2023 shows that agricultural pumping of 361,933 AF is significantly below the 2017 baseline level of 447,000 AF and the 1995 baseline level of 431,300 AF.	Table ES-1 references the 1995 agricultural water demand that was used as a baseline amount in the EIR for the 2010 General Plan (431,000 AF); that value was not developed as part of the Basin Investigation. The agricultural water demand of 447,000 AF is based on data from 2017 and is included in Table ES 1 as a reference recent year. Groundwater extraction data reported to the Monterey County Water Resources Agency was used to establish baseline groundwater pumping. Though more recent data were available, the 2017 groundwater extraction data were used as a baseline to be consistent with the most recent land use data and version of the SVIHM that were available at the time that the study was prepared.
Salinas Valley Water Coalition Letter dated 08/26/2024	3 of 3	The Report disregards historic and ongoing separate management of the Arroyo Seco Subarea and subsumes it into the Forebay Subarea.	See responses to comments October 2024 letters from the Arroyo Seco Groundwater Sustainability Agency and Clark Colony Water Company.

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Salinas Valley Basin Groundwater Sustainability Agency Letter dated 10/15/2024	1 of 1	No specific comments were provided in the letter requiring a response from the County.	This letter was directed to the Monterey County Farm Bureau, Salinas Basin Water Alliance, and Salinas Valley Water Coalition in response to their letter from August 30, 2024. County staff acknowledge receipt of the letter from the SVBGSA and looks forward to continued engagement with the SVBGSA.
Salinas Valley Water Coalition letter dated 10/25/24	1 of 12	The Investigation Report relies on outdated and inaccurate groundwater flow modeling and groundwater data from a non-representative time period to project long-term adverse basinwide trends that conflict with measured hydrogeological reality.	Modeling for the Investigation Report was completed using the best available versions of the groundwater-surface water modeling tools that were available at the time, including the time period for which the model version was calibrated (1967-2014). Groundwater data included all available data at the time the study was prepared, which ran through Fall 2021.
Salinas Valley Water Coalition letter dated 10/25/24	2 of 12	The Investigation Report relies upon groundwater flow modeling that is widely known to be so outdated and inaccurate that the models have been significantly updated to produce results that much more closely match actual measured reality.	The Investigation Report discloses the provisional nature of the modeling tools which, by nature of not being finalized, are subject to revision. However, the version of the modeling utilized for the study was the best available tool at the time that the work was completed.
Salinas Valley Water Coalition letter dated 10/25/24	3 of 12	The Investigation Report was recently released in August 2024, so the updated models could and should have been used to analyze and project the groundwater trends that the 2012 Settlement specified for analysis.	Modeling for the study described in the Investigation Report takes a considerable amount of time to complete, followed by an extensive process of data analysis. A single model version was selected for this work so that tasks could progress and a report could be developed.
Salinas Valley Water Coalition letter dated 10/25/24	4 of 12	The Investigation Report projects a future trend of declining groundwater elevations based on a short historic time period that started with above-normal water levels and ended with below-normal levels caused by a drought. That time period does not accurately represent the actual range of hydrologic conditions affecting Salinas Valley groundwater conditions and predetermined the negative outcome. The Investigation Report presented that analysis as a basinwide trend, so that the trend of declining groundwater conditions in one or two state-defined subbasins erroneously makes it appear that all parts of the basin are in decline.	The time period 2011 to 2019 was used to describe the recent observed groundwater level trends because it reflects a period where all major water projects (i.e. reservoirs, CSIP, and SVWP) were in place and operational and climate conditions are reflecting current trends. Groundwater level data during the drought period were omitted from the annual average groundwater elevation change calculation for this period, as described in Appendix A of the Investigation Report. Projected groundwater elevations results were extrapolated from a timeframe in the model with a sequence of years that had climate and hydrologic conditions similar to 1996-2014.
Salinas Valley Water Coalition letter dated 10/25/24	5 of 12	Analysis of groundwater conditions data from a time period that accurately represents the range of alternating wetter and drier periods, and accurate presentation of that data for each of the state-defined subbasins, would have shown that groundwater conditions in the 180/400-Foot Aquifer (aka Pressure) Subbasin and Eastside Subbasin are declining, while conditions in the Upper Valley and Forebay subbasins are stable.	See response to comment 4.
Salinas Valley Water Coalition letter dated 10/25/24	6 of 12	The Investigation Report's flawed modeling projects a trend of increased agricultural groundwater pumping after 2021 that conflicts with measured reality. The actual measured data shows a long-term trend of decreasing groundwater pumping from 1995 to 2022, with 2023 data showing pumping was notably below any prior years.	Groundwater extraction data from 2017 was used as the baseline to be consistent with the most recent land use and pumping input files available for the SVIHM at the time that the study was prepared.
Salinas Valley Water Coalition letter dated 10/25/24	7 of 12	The Investigation Report is so fundamentally flawed that it fails to meet the professional standard of care for informing decisions on whether or how to update Monterey County's General Plan. The Report must either be corrected with accurate data and analyses or should be scrapped in favor of relying upon information from the Salinas Valley Groundwater Basin Sustainability Agency. Rather than waste more money trying to correct the Investigation Report, the County should instead rely on information developed at great expense by the SVBGSA to inform any updates to the General Plan.	The conclusions of the Investigation Report, as well as the overall trends in groundwater levels and seawater intrusion, are generally in alignment with findings of the approved Groundwater Sustainability Plans in the Salinas Valley Groundwater Basin and with data presented annually by MCWRA since completion of the Investigation Report. Without an expectation of substantively different results, County staff does not believe it would be prudent to invest the time and resources to update the modeling and revise the Investigation Report.

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Salinas Valley Water Coalition letter dated 10/25/24	8 of 12	More than a decade after execution of the 2012 Settlement, the Coalition continues to seek alignment of County General Plan policies with ongoing management of groundwater across the Salinas Valley's subbasins, including the Upper Valley, Forebay, 180/400-Foot Aquifer, and Eastside subbasins designated by the California Department of Water Resources ("DWR"). And while the County must continue to recognize the beneficial impact of the SVWP on groundwater availability pursuant to the Settlement, the 2014 enactment of SGMA provides further grounds to align the County's General Plan policies with groundwater management being carried out pursuant to SGMA.	Completion of the Investigation Report meets the terms for completion of a study as stated in PS-3.1 of the General Plan. Many of the recommended measures in the Investigation Report are already being undertaken by other agencies such as MCWRA and the SVBGSA, which highlights the significant changes in groundwater management that have occurred since the time the General Plan policy was adopted.
Salinas Valley Water Coalition letter dated 10/25/24	9 of 12	DWR has approved GSP sustainability for the Upper Valley and Forebay subbasins: Pursuant to SGMA, DWR has designated the Upper Valley and Forebay subbasins as medium priority and has reviewed and approved the Upper Valley and Forebay GSPs, which find groundwater conditions in these two subbasins to be sustainable.	The Investigation Report is not making a determination of sustainability for the study area.
Salinas Valley Water Coalition letter dated 10/25/24	10 of 12	The 180/400-Foot Aquifer Subbasin GSP expressly anticipates the need to coordinate the County's land-use planning for this subbasin with the GSP and SGMA's mandate to achieve sustainability.	County staff anticipates collaborating with Groundwater Sustainability Agencies and other entities with land use authority to establish protocols and ensure that land use planning and efforts to achieve groundwater sustainability are complementary.
Salinas Valley Water Coalition letter dated 10/25/24	11 of 12	The County's 2012 Settlement implementation must respect SGMA sustainability findings for the Upper Valley and Forebay subbasins: Any General Plan amendment adopted by the County pursuant to the 2012 Settlement (or otherwise) must respect the SGMA sustainability findings for the Upper Valley and Forebay subbasins and the findings of critical overdraft and need for management actions for the 180/400-Foot Aquifer and Eastside subbasins. For example, any General Plan amendment should not impose restrictions on agricultural land uses in the Upper Valley and Forebay, because their groundwater use and conditions are sustainable - as determined by the SVBGSA and DWR. To do otherwise would violate legal principles that require an essential nexus and proportionality between effects of land uses in these two subbasins and any conditions or restrictions imposed by the County.	County staff acknowledges the temporal and geographic limitations of the scope of the Investigation Report and recommends proceeding by coordination with Groundwater Sustainability Agencies and other entities with water management authority on measures to address conditions identified in the Investigation Report, where confirmed by more recent data from MCWRA and GSAs.
Salinas Valley Water Coalition letter dated 10/25/24	12 of 12	The Coalition respectfully submits that the Investigation Report cannot be used to support any amendments to the General Plan. The Investigation Report could be redone and corrected, but the time and money needed to do that seems wasteful in light of the ready availability of technical information and support available from the SVBGSA. As a signatory to the 2012 Settlement and a stakeholder with strong interest in prudent groundwater management and land-use planning, the Coalition recommends the latter approach.	See response to comment 7.

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Clark Colony Water Company Letter dated 10/25/24	1 of 8	Because the SVGB Report was initiated before SGMA, which now governs groundwater management in the SVGB, and the report does not accurately characterize the Arroyo Seco Cone Management Area, the County should disregard the report as it relates to that part of the SVGB.	The Arroyo Seco Cone Management Area did not exist when the Basin Investigation was initiated though the geographic area covered by the Arroyo Seco Cone Management Area is part of the study area.
Clark Colony Water Company Letter dated 10/25/24	2 of 8	CCWC agrees that it is critical for the County to work closely with each GSA to ensure that any actions taken related to the Report are consistent with the approved GSPs.	Comment received.
Clark Colony Water Company Letter dated 10/25/24	3 of 8	CCWC remains concerned, however, that the SVGB Report inaccurately characterizes the Arroyo Seco Cone Management area. As stated in CCWC's August 26, 2024, letter, the Report inexplicably determines not to delineate what it refers to as the "Arroyo Seco Subarea" from the "Forebay Subarea" due to "strong hydrologic connection" between the two. While CCWC does not dispute that there is hydrologic connection, it has been settled for some time that the Arroyo Seco Cone Management Area is distinct from the rest of the Forebay Subbasin. This is true not only because of better groundwater conditions in the Arroyo Seco Cone Management Area than in other parts of the Forebay Subbasin and Salinas Valley in general, but also because, as a practical matter, the area has been recognized as distinct for the purposes of groundwater management since before SGMA was enacted. Further, a separate GSA, the Arroyo Seco GSA, manages this distinct part of the Subbasin. And the Forebay GSP expressly recognizes the distinction between the Forebay Subbasin and the Arroyo Seco Cone Management Area.	The Investigation Report acknowledges and describes the features of the Arroyo Seco Cone (Section 2.4.5.1.3) but does not report out metrics separately for the Arroyo Seco Subarea.
Clark Colony Water Company Letter dated 10/25/24	4 of 8	To the extent the County intends to use the SVGB Report to inform any land use decision-making associated with this part of the SVGB, this inaccurate and inconsistent characterization of the Arroyo Seco Cone Management Area must be corrected. This distinction is critical and foundational to the groundwater management in the Subbasin. Because it was ignored at the outset of the investigation, all conclusions reached in the Report related to this part of the Salinas Valley are unreliable. Due to the time, effort, and cost that would be associated with correcting this fundamental error in the Report's analysis, CCWC recommends that the County not rely on this Report as it relates to the Forebay Subbasin at all, and instead utilize the operative GSP and coordinate with the appropriate GSAs to inform any land use decisions associated with that part of the Basin.	County staff recommend coordinating with all Groundwater Sustainability Agencies on land use decisions to ensure that such decisions would not adversely affect the ability of any GSA to achieve groundwater sustainability, while also helping the plans developed by GSAs account for future land uses and growth, with the goal of aligning efforts between agencies responsible for groundwater sustainability and land use.
Clark Colony Water Company Letter dated 10/25/24	5 of 8	The findings of the investigation are flawed because, at least with respect to the Forebay Subbasin and Arroyo Seco Cone Management Area, the foundational premise that there is no distinction between the two is not only factually inaccurate but is also inconsistent with the operative GSP. Accordingly, any findings of the Report related to this part of the Salinas Valley are questionable and the County's resolution should reflect this concern.	The Investigation Report acknowledges the features that make the Arroyo Seco Cone distinct from the Forebay Subarea even though metrics are not reported separately for the two geographic areas.
Clark Colony Water Company Letter dated 10/25/24	6 of 8	CCWC urges the County to disregard the SVGB Report as it relates to the Forebay Subbasin and Arroyo Seco Cone Management Area, and instead utilize the Forebay GSP to inform amendments to the General Plan that may affect that part of the Salinas Valley.	See response to comment 4.
Clark Colony Water Company Letter dated 10/25/24	7 of 8	The SVGB Report was part of a settlement agreement entered into nearly 15 years ago, where there was an information gap that the Report was intending to fill, in part because it was before the enactment of SGMA. Given the intervening events of the last 15 years, which include but are not limited to the passage of SGMA, the formation of GSAs, and the adoption and approval of GSPs that govern groundwater management in the same area investigated by the Report, CCWC questions the need for the County to use the Report at all. Given the significant concerns CCWC and others have raised with the Report's analysis and findings, CCWC urges the County to consider disregarding the Report altogether.	County staff acknowledge the temporal and geographic limitations of the scope of the Investigation Report and recommends proceeding by coordination with Groundwater Sustainability Agencies and other entities with water management authority on measures to address conditions identified in the Investigation Report, where confirmed by more recent data from MCWRA and GSAs.
Clark Colony Water Company Letter dated 10/25/24	8 of 8	In undertaking the process to make amendments to its General Plan related to groundwater management, the County would be well positioned to simply coordinate with the GSAs and rely on the GSPs to inform future land use planning and decisions. Any determination to disregard the Report should also be reflected in the Resolution, however, so it is clear to the public that the Report is not being relied upon by the County.	See response to comment 4.

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Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	1 of 17	Not the least of the ASGSA issues and concerns is the omission of the Arroyo Seco Cone and its unique characteristics as described in the 1947 Bulletin 52 Report prepared by the State of California and virtually all subsequent groundwater investigations.	The Investigation Report describes the Arroyo Seco Cone alluvial fan as one of the geologic facies in the Forebay Subarea.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	2 of 17	The Investigation also makes several observations and draws conclusions that appear to diverge from the work performed by Montgomery & Associates in the approved Groundwater Sustainability Plans (GSPs) prepared by the Salinas Valley Groundwater Sustainability Agency ( <i>sic</i> ) and the ASGSA.	The Investigation Report describes a geographic space and temporal range that differ from those areas and time scales covered by the Groundwater Sustainability Plans.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	3 of 17	"Throughout most of the southern two-thirds of the Basin, the groundwater system is in the alluvium. The alluvium does not include laterally continuous clay layers to restrict vertical flow and divide the alluvium into distinguishable aquifers. Rather, the alluvium is undifferentiated and groundwater production wells are screened in the shallowest productive sand and gravel intervals." This is inconsistent with recent AEM interpretations that the Deep Aquifer extends south to Soledad based on the presence of a continuous aquitard. However, the Forebay GSP and draft Arroyo Seco GSP also concluded that the alluvium is a single hydrogeologic unit or principal aquifer.	Data from the Airborne Electromagnetic surveys conducted by the Department of Water Resources and as part of the Deep Aquifers Study were not available for inclusion in the Investigation Report. County staff recommend that future work on land use or implementation of other recommendations from the Investigation Report occur in collaboration with Groundwater Sustainability Agencies and other entities with water management authority, with consideration of best available data, which would include the AEM data going forward.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	4 of 17	The ASGSA strongly disagrees with the interpretation that the Arroyo Seco Cone is not hydrogeologically distinct from the rest of the Forebay Subbasin. Not only is this new interpretation at odds with 80 years of prior hydrogeologic studies (dating back to DWR Bulletin 52), but it is inconsistent with geologic, water level and water quality data. Geologically, basin fill in the Arroyo Seco Cone is generally coarser-grained than in surrounding parts of the Subbasin, continuous aquitards are absent, water levels show much greater interannual variability than wells elsewhere in the Subbasin (which are tied more closely to Salinas River flow and elevation), and the water levels do not exhibit the large declines in years without conservation releases from Nacimiento and San Antonio Reservoirs that wells elsewhere exhibit.	The Investigation Report acknowledges the features that make the Arroyo Seco Cone distinct from the Forebay Subarea even though metrics are not reported separately for the two geographic areas.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	5 of 17	"Due to the lack of extensive and traceable subsurface units, the Basin Fill Aquifer of the Upper Valley Subarea is generally unconfined and considered to be 1 unit (Brown and Caldwell, 2015)." This is inconsistent with Montgomery & Associates' recent interpretation that the Paso Robles Formation beneath the alluvium is functionally part of the basin fill and distinct from the alluvium in terms of hydraulic conductivity.	County staff recommend that future work on land use or implementation of other recommendations from the Investigation Report occur in collaboration with Groundwater Sustainability Agencies and other entities with water management authority, with consideration of best available data, which may differ from what was utilized in developing the 2015 report that is cited in this comment.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	6 of 17	The introduction to the recharge discussion states, "This section only identifies areas of natural recharge; anthropogenic recharge is not discussed here." However, the subsequent bullet list includes deep percolation of excess applied irrigation water, which is an anthropogenic, not natural, source of recharge.	Comment received. The overall discussion of the recharge section remains valid though the specified bullet point about applied irrigation water could have been framed differently.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	7 of 17	The introduction to the seawater intrusion section states "Increased salt concentrations from seawater intrusion, measured as TDS or chloride concentration, are considered a nuisance for domestic or municipal uses rather than a health or toxicity concern. Additionally, increased salt concentrations from seawater intrusion may impact the ability to use groundwater for irrigation." This language grossly understates the severe consequences of intrusion. TDS above 500 mg/L (long-term) or 1,000 mg/L (short term) is not merely a "nuisance", it violates State of California secondary MCL's for drinking water. With respect to agriculture, it is disingenuous to say that elevated salinity "may" impact irrigation use. It definitely impacts it and has rendered groundwater throughout most of the coastal area completely unusable for the vegetable crops that are grown there.	The paragraph following the selected one cited in the comment (see section 2.4.9 of the Investigation Report) specifically describes the State Secondary MCL for TDS and describes TDS limits for agricultural use, including impacts to multiple crop types that have been observed at various levels of TDS. These various thresholds are numerically described and can be compared, in the Investigation Report, to levels of TDS in seawater and the chloride concentrations used by MCWRA to map seawater intrusion.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	8 of 17	The text incorrectly states that Clark Colony Water Company diversions average 300 acre-feet/year (AFY). During 1995-2017, they averaged 5,208 AFY.	The difference in data is noted and model input data will be confirmed for future applications.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	9 of 17	The consistent downward trends since the 1940s in the Eastside Subbasin, since the 1980s in the 180/400 Subbasin, and since 2000 in the Forebay Subbasin can't be due to recent dry conditions. It looks more like the gradual spread of a cone of depression. Groundwater pumping has remained approximately flat since at least 1995 (see Fig. 4-12), and the cumulative departure plots of rainfall at Salinas and annual discharge of the Arroyo Seco have also had negligible net change since 1995.	The Investigation Report describes groundwater level declines since 2000 as being impacted by drier than average climate conditions and notes that there are fluctuations in groundwater elevations over time due to changes in water supply, water demand, and climate.

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Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	10 of 17	For the Forebay Subbasin, separate hydrographs should be shown for wells in the Arroyo Seco Management Area (no long-term trend) vs. the rest of the Forebay (declining trend).	The Investigation Report acknowledges the features that make the Arroyo Seco Cone distinct from the Forebay Subarea even though metrics are not reported separately for the two geographic areas.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	11 of 17	The period from 2011-2021 used to illustrate recent historical water-level changes was considerably drier than average for both Salinas rainfall and Arroyo Seco discharge. It does not represent "average" conditions and overstates typical water-level declines. Net change from 1995-2021 would be more accurate.	As described in Appendix A of the Investigation Report, "recent" groundwater elevation trends were based on data from 2011 to 2019, excluding those years that were strongly impacted by drought. For purposes of modeling, hydrologic and climatic conditions from the period 1996 to 2014 were used as a representative timeframe.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	12 of 17	"Groundwater elevations in 2030 are projected by the SVOM to be slightly lower than 2021 levels on average in the Eastside, Pressure, and Upper Valley Subareas, and increase slightly in the Forebay Subarea." Why would the Forebay trend shift from downward to flat and the Upper Valley shift from flat to downward, while the other subbasins continued their 2011-2021 trends?	The same approach was applied to all subbasins. Projected groundwater elevations in 2030 were influenced by simulated land use changes, agricultural and urban water demands, and changes in climate that result in different hydrologic patterns of precipitation and runoff.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	13 of 17	"Groundwater levels declined in all Zone 2C Subareas since 2010 by 3 to 8 feet on average." This might not be a hydrologically representative period. See comment for p. 106, above, stating that 2011-2021 was considerably drier than average. Also, Arroyo Seco Cone hydrographs show little or no net decline. The text needs to state this exception.	The Investigation Report acknowledges the features that make the Arroyo Seco Cone distinct from the Forebay Subarea even though metrics are not reported separately for the two geographic areas.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	14 of 17	The discussion of agricultural water conservation focuses solely on matching applied water to ETo. It should mention irrigation methods. Much of the cropland in the Salinas Valley continues to be irrigated with standard impulse sprinklers, which have high spray evaporation losses in the windy climate of the Valley. Conversion to drip, LEPA or other methods that reduce spray evaporation losses could achieve a significant reduction in applied water amounts. The text should mention this.	The beginning of the "Support conservation to reduce groundwater demand" section on page 130 of the Investigation Report advocates for continued support of adopting efficient technologies for both urban and agricultural conservation.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	15 of 17	The ASGSA understands that the water rights for Nacimiento and San Antonio Reservoirs have seasonal restrictions on certain types of releases. Modifying the water rights to allow releases at any time of year might provide additional flexibility that would increase overall yield or other benefits. If analysis shows this to be the case, then applying to the SWRCB to modify the water right would be a worthwhile measure.	Discussion of reservoir reoperations is ongoing through MCWRA's process of developing the Salinas River Operations Habitat Conservation Plan.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	16 of 17	"Recharge features can capture and recharge a portion of the stormwater by infiltration management techniques like LIDs, dry wells, or rain gardens. Larger scale projects in areas where the groundwater table is high will likely have the greatest impact. Small scale or disperse efforts are unlikely to have substantial impacts on groundwater levels in areas where groundwater table is lower or where extraction far exceeds the amount recharged." This conceptual model is incorrect in several respects. Areas where the water table is shallow are often areas of groundwater discharge (to streams or via phreatophyte evapotranspiration). They also have limited storage capacity for accepting additional recharge. In contrast, additional recharge where the water table is low will likely remain in storage for a longer period and still be available for extraction during a subsequent drought. Those areas also have large amounts of available storage capacity. Finally, areas where groundwater extraction is high are desirable for enhanced recharge because the additional recharge offsets local pumping and helps prevent further local water-level declines.	The Salinas Valley Basin Groundwater Sustainability Agency is discussing a range of conservation efforts with each subbasin implementation committee. Project and management actions suited to each subbasin will be evaluated through the subbasin committee process.
Arroyo Seco Groundwater Sustainability Agency Letter dated 10/24/2024	17 of 17	"The aquifers within the Valley are hydrologically connected, so extraction farther from locations of decline or seawater intrusion could have an impact; however, groundwater movement is slow, and impact is greater when extraction occurs closer to the seawater intrusion front." This statement would be true in the absence of the Salinas River. In reality, changes in pumping up-valley from the 180/400 and Eastside Subbasins tends to be offset by changes in river percolation so that drawdown in the subsurface does not reach the downstream subbasins. This must be considered in any pumping reduction plan.	The Salinas Valley Basin Groundwater Sustainability Agency has initiated discussions of demand management at the subbasin level. Additional efforts to reduce groundwater extraction, such as the Multi-Benefit Land Repurposing program, are underway throughout the County. Existing conditions and best available data would be considered as part of any project or program.



Commenter	Comment Number	Comment	Response
Kevin Piearcy Letter dated 10/24/2024	1 of 5	While your report tries to relate ground water decline to agricultural pumping, you fail to mention that just prior to your reporting period the Salinas Valley had just gone through a prolonged drought period (2007-2009, as well as droughts during your reporting period, (2011-2017 and 2020 to 2022). While pumping may have caused deeper pumping levels, drought caused the majority of decline seen from static (standing) water levels. I believe it should be noted that the ground water elevation levels recovered to previous recorded higher levels with each and every Non drought water cycle shows the aquifer is functioning properly.	As described in Appendix A of the Investigation Report, "recent" groundwater elevation trends were based on data from 2011 to 2019, excluding those years that were strongly impacted by drought. For purposes of modeling, hydrologic and climatic conditions from the period 1996 to 2014 were used as a representative timeframe.
Kevin Piearcy Letter dated 10/24/2024	2 of 5	Your comments regarding your report's statement using "Figures 4-21 and 4-22 show groundwater elevation contours for the 400-foot and Deep Zone of the Eastside Subarea Aquifers in the Fall 2011 and 2021, respectively", is totally incorrect. The Eastside Subarea does not have a 400' or a Deep Aquifer. The 180 ft, 400 ft and Deep Aquifers have only been found in the Pressure Subarea and these cease to exist in the Pressure Area north of the town of Chualar. From the point south of the 180/400 the Aquifer is found to consist of fragmented clay layer, no longer having any defined clay layers. The Eastside also has no defined clay layer.	The cited figures depict data from the 400-Foot Aquifer within the Pressure Subarea and the Deep Zone of the East Side Subarea. The listed figures show groundwater elevation contours for both aquifer units on the same figure.
Kevin Piearcy Letter dated 10/24/2024	3 of 5	You also state, " Since the EIR, groundwater elevations in the 400-Foot and Deep Zone of the Eastside Subarea Aquifer have slightly declined over time in most areas in the Eastside and Pressure Subareas. Groundwater elevation declines are greatest, ranging up to 40-feet, south of Chualar Creek and at the upgradient aquifer extent near Gonzales." I think this statement is incorrect. Having reviewed thousands of pump reports and serving on the MCWRA Basin Management Committee reviewing the groundwater elevation contour maps multiple times a year, none have shown such a large decline as you are reporting. What they have shown is the elevation contour lines south of Chualar Creek have stood consistent, well above sea-level, for decades.	The referenced statement is based on a comparison of change in groundwater elevations from 2011 to 2021 in the 400-Foot Aquifer and the Deep Zone of the Eastside subarea, as shown in Figure 4-23. The change in groundwater elevations utilized groundwater elevation contours created by MCWRA and determines a difference between contoured areas for the specified time frame.
Kevin Piearcy Letter dated 10/24/2024	4 of 5	While the Dept. of Water Resources have falsely stated the subareas in the Salinas Valley to be sub-basins, State Bulletin 52-B (1947) created 5 Subareas and in their creation clearly and strongly states, "These areas are not in any way to be confused with sub-basins." All the subareas were created to be used as study areas, recognizing that they are not sub-basins. The Pressure and Eastside Subareas have been found to have so many differences within these subareas that subareas within the 2 subareas where formed. Pressure Area with 3 sub areas (P1, P2, and P3) and the Eastside (E1 and E2). If you look at the elevation contour maps you will see that P3 in the Pressure Area and E2 in the Eastside Subarea have more in common to each other than they do to the other areas to the north of them. This is also aided by the fact that the 180/400' ends where the contour lines switch from negative measurements to positive measurements.	The Investigation Report used MCWRA Zone 2C as a Study Area and refers to the four major water-producing subareas within Zone 2C when compiling analysis metrics for the Investigation Report.
Kevin Piearcy Letter dated 10/24/2024	5 of 5	We believe that your report should not move forward and that the Monterey County Board of Supervisors should not except ( <i>sic</i> ) it for approval until the many incorrect statements in your report are removed and corrected.	The conclusions of the Investigation Report, as well as the overall trends in groundwater levels and seawater intrusion, are generally in alignment with findings of the approved Groundwater Sustainability Plans in the Salinas Valley Groundwater Basin and with data presented annually by MCWRA since completion of the Investigation Report. Without an expectation of substantively different results, County staff does not believe it would be prudent to invest the time and resources to update the modeling and revise the Investigation Report.

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