

Summary of Shandon-San Juan GSA Board and Staff comments of the Final Draft GSP

These edits and comments are combined from attendees and Board Members during SSJ Board Meetings of 8/27/19, 9/5/19 and 9/17/19.

The Draft GSP is the culmination of a long and cooperative effort and includes inputs from many readers and outlooks. Because of the convoluted process and time limitations, some Chapters were completed in a rush. We have found some sections that would benefit from clarification and from adding language to help the document follow the language and requirements imbedded in the Regulations and underlying Legislation. A few typographical errors are noted as well.

To make the comments specific to the document and to give them context to each section they are included as edits in the full GSP text.

Because the document is very large **yellow highlights** are used to attract the readers eye. Not for emphasis.

A summary of where to find the key edits/comments:

Executive Summary

ES-7 To clarify minimum thresholds and measurable objectives for change in storage areas a proxy the same as those for standing groundwater levels.

ES-8 Emphasis the importance of BMPS, voluntary fallowing and enhancement projects.

Vol. 1 Ch. 1-6

5.6 Clarify that projects and actions of the GSAs in implementing the GSP will not cause undesirable results to groundwater quality.

6.3.2.4 Historical, 6.4.2.4 Current and 6.5.3.3 Future Water Budgets – clarify language to better comply with Regulations and SGMA legislation to include the conditions or practices that would lead to undesirable results in discussions of sustainable yield along with water budget calculations.

Vol. 2 Ch. 7-12

Include 357.4 Interagency Agreements in Regulatory Checklist page xiv.

8.1 Clarify definitions for minimum threshold and undesirable results to conform with legislation.

8.3.4.1 Adjust the minimum threshold in three of the monitoring wells to match the current sustainable annual fluctuations of groundwater levels. These are also corrected in Appendix H.

8.3.4.4 Edits here and in other sections of Ch. 8+9 regarding sustainable yield needing to be qualified by unreasonable conditions and for those conditions to match the Regulation and Statute.

8.3.5.1 Clarify that in the future it is likely that growing data and understanding will require adjustments to minimum thresholds and measurable objectives.

8.4.3 The measurable objective and minimum thresholds for groundwater in storage are not the same and are as a proxy set to match the measurable objective and minimum thresholds for standing water levels. This requires annual calculations of the change of water in storage across the basin, but allows the same leeway. Groundwater levels are the best measurement available to understand change in groundwater in storage.

8.7.3 8.7.3.1 8.7.4.1 8.7.4.3 Measureable objective for subsidence is to maintain current conditions. Minimum threshold for subsidence is “the rate and extent of subsidence that substantially interferes with surface land uses and may lead to undesirable results” “that cause significant and unreasonable effects in the Basin” due to groundwater pumping. Zero exceedances are not realistic and do not comply with the Regulation.

8.9.4 Clarify language to avoid undesirable results.

9.1 Language to better clarify the intended actions

9.3.4.2 clarify benefits of following

9.4.1 language to include and emphasis benefits of water enhancement projects and clarifying language to better lay out the likely order of actions.

9.4.1.3 “The mandatory pumping limitation program will be implemented [in specific areas of persistent decline where that decline threatens undesirable results](#), after the GSAs [study and](#) adopt a regulatory program”.

9.5 add: “[Projects are clearly needed. The primary approach to attaining sustainability will rely first on Best Management Practices and developing projects that will reduce or eliminate any shortfall in achieving a sustainable yield. Willing parties will plan, design and secure funding to initiate practical cost effective projects in a fully public process. Interested parties are already moving several projects forward](#)”. Also added detail to stormwater capture projects.

10.1 Language to emphasis the need for the GSAs to work together.

Chapter 12 Memorandum of Agreement

The current MOA was designed specifically to guide the GSAs through the process to create the GSP. It was not designed to guide the collaborative efforts needed to implement the GSP. It is important to include in this GSP a clear agreement between the four GSAs on how they will make the critical decisions required for GSP implementation and that describes how they will work together in that process. After the important decisions are made in the first 3 to 7 years, managing the Basin under the GSP becomes more straight forward and less controversial. Having the assurance and confidence on how the GSAs will proceed and interact during the critical start up phases will greatly enhance successful implementation and Basin management.