

SLO Groundwater Sustainability Plan Public Comments // Updated: 08/19/2020

Name	Comment Subject	Comment	Date/Time	Source
James Waldsmith	GSP Chapters 1 & 2 - DRAFT	Could you send me a copy of the presentations presented on 9-11-19 in PDF format? In reviewing the available download of chapters 1 and 2 I do not find any of the Hydrology data presented.Please confirm receipt of this communication.	9/14/2019 13:24	Website
Toby Moore	GSP Chapters 1 & 2 - DRAFT - Agency Information	Golden State Water Company is of the opinion that an advisory body, similar or with the same structure of the current Groundwater Sustainability Commission (GSC), may be beneficial and perhaps necessary for GSP implementation. The MOU establishing the GSC contemplates this and does have language stating the following, "Depending on the content of the GSP the Parties may decide to enter into a new agreement to coordinate implementation. Inclusion of this language in Section 2.3.2 is recommended.Please consider the addition of the following text before the last sentence in Section 2.3.2. "The Parties may decide to enter into a new agreement to coordinate GSP implementation."	10/31/2019 9:17	Website

George Donati	SLO Basin GSP Chapters 3 & 4 - DRAFT	<p>3.1 SLO Basin Introduction - We need to include the history of the Edna Valley Basin. In the 1950's - 1960's the East branch of the Corral de Piedra creek was dammed to install a 500 acre foot reservoir. In the 1970's, this dam was raised for a 1000 acre foot reservoir. This dam removed all flow of water into the Edna Valley Basin as the water was used for crop irrigation outside of the Edna Valley Basin. The flow downstream of the dam is not properly managed by the owner of the dam and the state water board. This has greatly reduced the re-charge of the Edna Valley Basin for the past 50 years.</p> <p>3.4.1 Water Source Types - This states " Excluding the Edna Valley Golf Course, all water demand in the SLO Basin are met with groundwater" - This needs to be clarified. The Golf course uses ground water to irrigate the course, and the golf course sells groundwater water to Golden State Water Company for residential use.</p> <p>3.4.2 Water Use Sectors - Industrial - The ground water wells that supply water to the Price Canyon Oil Field are just outside of the basin boundary. Why are these wells not considered to use groundwater from the Edna Valley Basin since a natural flow from the creek passes adjacent to these wells?</p> <p>3.6.1.3 We are monitoring the flow of San Luis Obispo Creek as surface water leaves the San Luis Basin. Why not monitor the flow of the other major creeks, east and west Corral de Piedra at the edge of the Edna Valley Basin to determine the flow that is leaving the Basin? Or better yet, the flow that could be coming into the basin below the Dam on the East side of the valley.</p>	1/30/2020 8:10 Website
Toby Moore	Communication and Engagement Plan	<p>Appendix B of the plan describes the Groundwater Communication Portal's functionality which includes a repository of comments provided by stakeholders. However, it does not indicate whether the comments submitted will be visible or available via other means for stakeholders to review. Currently there appears to not be such functionality. As a member of the Groundwater Sustainability Commission, I feel this functionality is helpful and would encourage its implementation.</p>	8/29/2019 9:20
Mark Capeli	SLO GSP Chapter 5 -- DRAFT - 5.8 Potential Groundwater Dependent Ecosystems	<p>Enclosed with this letter are NOAA National Marine Fisheries Service (NMFS) comments on Chapter 5: Groundwater Conditions of the San Luis Obispo Valley Groundwater Basin (SLO Valley Basin) Groundwater Sustainability Plan (GSP). ATTACHMENT: 29MAY2020_Sustainability Plan (Chapter 5) For SLO Valley Groundwater Basin_MC.pdf</p> <p>ATTACHMENT: 29MAY2020_Sustainability Plan (Chapter 5) For SLO Valley Groundwater Basin_MC.pdf</p>	5/29/2020 14:59 Website

Steph Wald

General
Comments

Thank you for the opportunity to comment on Chapter 5 Groundwater Conditions of the SLO Basin Groundwater Sustainability Plan. We previously provided comments dated January 7, 2018, in the earlier phases of the development of the SLO Valley Basin. Those comments provided direction on a framework for addressing Groundwater Dependent Ecosystems (GDE) under SGMA by The Nature Conservancy. Thank you for utilizing the framework and careful consideration of GDEs in Chapter 5.

6/1/2020 14:24 Website

Regarding the integration of technical datasets on GDEs, Figure 5-15 identifies potential GDEs and that those identified are not yet verified. While a monitoring network for future planning efforts may verify GDEs through subsequent field reconnaissance, I would suggest that project development could be informed by having GDE verification sooner rather than later. If this is not possible, and there isn't enough data to label them unlikely GDEs, different language to label them might be appropriate such as less likely GDEs.

Typos:

§Page 25, second paragraph, second sentence, add o to to: The Stillwater study identifies much of the drainage area of East and West Corral de Piedras Creeks, as well as area of alluvium of smaller streams to the southeast, as having high recharge potential.

Thank you.

Toby Moore

DRAFT_SLOGSP_
Modeling_TM
No.1.pdf - Section
5. MODFLOW:
Groundwater Flow
Model

In section 5.1.5 "Well Pumpage", the memo identifies that the model will estimate well extractions for all wells except those owned and used for "municipal pumpage by the City will be represented in the specific wells owned and operated by the City". Golden State Water Company (GSWC) also owns and operates a public water system (GSWC - Edna System) and their municipal well extractions are metered and should be inputs into the model as opposed to estimates.

6/15/2020 16:41 Website

Suggested text: "CHG estimates of historical well pumpage developed for the water budget analysis will be incorporated into the historical calibration of the groundwater model. Municipal pumpage by the City and Golden State Water Company (GSWC) will be represented in the specific wells owned and operated by the City and GSWC, respectively."

Sally Kruger

General
Comments

Hi there, saw you on the GSP call yesterday and don't know if you know that we used to live on Righetti Road just down from the Righetti dam and had a creek (WCDPC) running through our property that used to have lots of steelhead in it. Unfortunately, between climate change, droughts and the dam, the steelhead have pretty much disappeared. I found yesterday's meeting to have a very interesting figure in it. The one that estimates a sustainable basin for the SLO Valley is estimated to be 5600 AF. The Righetti dam has State water right permits to hold back 991 AF. (The largest private reservoir in the State) Of course, their property and the dam are not within the boundaries of the watershed for which the plan is being developed. But I couldn't help but be astonished that the permits allow them almost 20% of the water needed to maintain the whole slo water basin and all the vineyards and ag as well as residents contained in it. I've spent a great deal of my time and energy working with Creeklands conservation, CDFW and SWRCB over the last 15 years to try to restore the water and the fish. I'm sure you would know as many of the city's projects have very long time lines. We now live in town, but I continue to work on "my" creek.

6/11/2020 0:00 Email

Just some interesting info for you.

Again, thanks, Sally

Jean-Pierre Wolff General
Comments

6/12/2020 0:00 Email

Dave,
Sometime ago I mentioned to you that within the Edna Valley watershed there are several permitted reservoirs diverting surface water flow from the creeks flowing into the basin. As such these diversions impact the ecosystem and groundwater recharge through percolation. The largest of these privately owned reservoirs is the Righetti reservoir which in 1990 was granted a 4th SWRCB permit which nearly doubled the allowable capacity from 552 AF to 951 AF. The four permits are 20496, 15444, 14086 and 12887 West Corral de Piedra Creek. These permits are regularly reviewed by the SWRCB when expiring and part of the permit extension/renewal process includes an evaluation of potential impact on the downstream hydrology and ecosystem, in this case the threaded steelhead trout habitat is mentioned in previous studies and reports. Additionally, since the SLO Basin and Edna Valley is now a DWR designated high priority basin this additional information needs to be part of the record.

When comparing and contrasting the annual basin recharge deficit versus upstream surface water diversion, the impact of a 951 AF reservoir and to a smaller extent the cumulative effect of other smaller reservoirs should not be ignored in the sustainability plan. As an example, the groundwater basin study being currently performed for the Arroyo Grande Basin does include the impact of Lopez Lake discharge flow rates for basin recharge and its ecosystem.

I respectfully suggest that this consideration and evaluation be made part of the Sustainability Plan. Feel free to circulate my input to your colleagues collaborating on the work product.

Regards,

Jean-Pierre Wolff Ph.D.

Grower and Vintner

Jeanne Blackwell
General
Comments

Can you really have a discussion about groundwater protection without recognizing the constant threat of over a million gallons a day of toxic, radioactive waste, man made chemicals, hydrogen sulfide to mention just a few that is deposited each day at the Arroyo Grande Oil Field that sits on 3 active fault lines? This water could potentially reach any ground water in the county and contaminate it. Once the groundwater is contaminated and with the construct of the fault lines no water anywhere in the county is safe. And the reason for that is none of the wells at the Arroyo Grande Oil Field have been certified safe by the EPA Class I Underground Injection Control program mandated under CFR 144.11. So, the biggest threat to our water is the elephant in the room and I would like to know if you are going to address this issue. Every community and municipality's ground water in SLO County is threatened with irreversible and irreparable water damage because of the unlicensed, unpermitted, illegal and unlawful dumping of toxic waste in the unincorporated areas of SLO county. The Board of Supervisors is the lead agency and responsible for allowing the Oil to operate without permit or license. It seems to be it would behoove every municipality that depends on clean, unencumbered groundwater would demand the Board of Supervisors get the proper and necessary certification and official verification that the Arroyo Grande Oil Field is safe to dispose of radioactive toxic and other hazardous waste without fear or threat of contamination for 10,000 years or until the toxic waste becomes inert, whichever comes first. I would like to know what you intend to do about the illegal dumping in our backyard. Thank you.

6/9/2020 0:00 Email

John S. Wimer
Stakeholder
Workshop
Summary:
Groundwater
Management
Vision

Yes, the 5 Guiding Principles included in the summary capture the highest priority values and outcomes you believe should drive the SLO Basin GSP

7/20/20 0:00:00 Website

Rick Rogers

Stakeholder
Workshop
Summary:
Groundwater
Management
Vision

The sufficiency, with regard to SGMA regulations, of Guiding Principle #3 depends largely on the intent and meaning of the term "sustained health". If the term is used to suggest a plan for sustaining into the future current conditions that do not support GDEs, then the phrasing does not conform to SGMA, which requires GSPs to avoid significant and unreasonable impact from streamflow depletion on beneficial uses of surface flow. A more appropriate route would entail the county analyzing and setting thresholds that avoid streamflow depletion impacts to beneficial uses of surface flow, and then ensuring those thresholds are met within the 20-year plan horizon, and sustained over the long-term SGMA planning horizon (50 years).

8/10/20 0:00:00 Website