

Technical Memorandum

January 16, 2019

To: Steve Johnson, Stetson Engineers

From: Timothy K. Parker, PG, CEG, CHG, IWVGA TAC Member

Subject: Comments on Section 1 – Introduction – Draft GSP – IWV Groundwater Basin

The Section is well written and appears generally adequate for the first section of a GSP. Included below are a few minor comments suggested to help improve the Section readability and content.

Page 1-1

The first paragraphs are laced with interpretation of SGMA, some of which are debatable and unnecessary for a GSP. For example: “and, where seemingly irreconcilable conflicts exist, provide for the most efficient and cost-effective allocation procedures that ensure water rights and due process.”

Page 1-1 Last Paragraph

“The results of overdraft have manifested themselves through various undesirable results, primarily the chronic lowering of groundwater levels and the reduction of groundwater in storage throughout the IWVGB” – water quality degradation is also one of the six undesirable results occurring based on the data available.

Page 1-6 Second Paragraph

“On August 17, 2017, the IWVGA entered into Agreement No. 02-17 to retain Steve Johnson as the WRM....”

The contract is with Stetson Engineers is it not? Or is it a personal contract with Steve Johnson?

1.3.2 Legal Authority First Two Paragraphs

SGMA has been mentioned numerous times in the document already, and on Page 1-6 there is a lengthy, unnecessary description of the history of the law and amendments – suggest striking both paragraphs as unnecessary or move the entire unnecessary background on SGMA to the beginning of Section 1 where SGMA is first introduced.

Section 1.3.2.1 and 1.3.2.2 Listing of PAC and TAC Members

The affiliations of the PAC and TAC members should be listed where the affiliation has a connection to the member appointment, for example:

- Joshua Nugent, Mojave Pistachio
- Tim Parker, Parker Groundwater -Consulting Hydrogeologist to IWVWD

It may be useful to include a summary of the process followed to appoint members to the PAC and TAC (solicitation of candidates etc.).

1.3.2.3 Interested Agencies and Roles

The subsection describes how the list was developed but lacks the following:

How is the list being maintained and who is responsible?

How can interested parties be added to the list?

1.4 Notice and Communication

The subsection indicates that a C&E was developed but lacks how the C&E is being implemented.

Suggest considering including the process in which it was developed since it was prepared by the PAC.

1.4.1 PAC Stakeholder/Public Outreach

The title of this subsection seems misnamed - - perhaps just call it Public Outreach?

The last sentence of paragraph 1 is inaccurate – all materials are not available on the website. The majority of the meeting materials, for the TAC at least, are hand-delivered handouts, that are not part of the emailed and web-posted meeting package, and are generally not included on the website because the IWVGA Secretary is not provided electronic copies by the WRM. I've previously commented on this to the WRM and requested that they provide electronic copies of all previously hand-delivered meeting handouts to the IWVGA Secretary so that they can be web-posted, and in the future to provide an electronic copy of all hand-delivered meeting handouts to the IWVGA Secretary at the time of the meeting. I believe it is in the best interest of the IWVGA to have a complete record of materials provided at the PAC and TAC meetings posted on the website.

1.5.1 Checklist for GSP Submittal

I think it is useful to provide the checklist for GSP submittal – it could also go in the front of the document in Section 1.

I believe it would be useful to provide the GSP Checklist to the TAC and PAC each time a new section is provided so that all can see the progress completed and work yet to be done. This also would provide reviewers an opportunity to check to make sure they are satisfied that the GSP section meets the regulatory requirements referenced by Water Code number.

Continuing Request for Detailed, Annotated GSP Outline

It would be useful for the WRM to provide an updated, detailed and annotated GSP outline. What was previously provided some months ago was basically a very rough outline out of DWR's guidance.