

From: Renee Westa-Lusk Member of PAC of IWVGA

October 11, 2019

SUBJECT: Comments on Section 4.2 Sustainability Goal

There is one grammatical correction that needs to be made on page 3 Section 4.2.4 the 4th line from the bottom of the page: please insert the word “be” between the words “will quantified” to read as “ will be quantified”.

I recommend that this section be accepted as written with the grammatical correction incorporated as above. This Section 4.2 Sustainability Goal has met all the requirements set forth in the “Draft Best Management Practices (BMPs) for the Sustainable Management of Groundwater” pages 31, 32, and 33 which is published by California Department of Water Resources.

From: Renee Westa-Lusk Member PAC of IWVGA

October 11, 2019

**SUBJECT: Comments on Sustainability Management Criteria Slides 1-13
presented at the TAC meeting on Thursday October 3, 2019**

To evaluate the content of the slides 1-13 presented at the TAC meeting I compared the content of the slides to each of the 4 sustainability indicators which apply to the IWV water basin and the applicable pages 8, 10, 12, 13, 15, 16 entitled under Minimum Thresholds contained in the “Draft Best Management Practices (BMPs) for Sustainable Management of Groundwater”. I found the following pertaining to the 4 sustainability indicators that apply to the IWV water basin:

<u>Sustainability Indicator</u>	<u>Comments</u>
Reduction of Storage	-this is the only sustainability indicator for the IWV basin not using historical data for information/criteria -slides 5 & 6 meet criteria on pages 8 & 10 (BMPs) but not answering most questions listed on page 13 (BMPs)
Chronic Lowering of Groundwater Levels	-slides 7,8,9 meet criteria on pages 8 & 10 (BMPs) but not addressing most questions listed on page 12 (BMPs)
Degraded Water Quality	-slide 10 met criteria on page 8(BMPs), did not meet criteria on page 10 (BMPs), did not address most of the questions on page 15(BMPs)
Land Subsidence	-slide 11 met criteria on pages 8 & 10(BMPs), slide 11 only addressed half the questions listed on page 16 (BMPs)

QUESTION: Are the questions on pages 12, 13, 15, and 16 going to be addressed in other chapters of the final GSP or will they not need to be answered by this GSP in order to meet approval of GSP by DWR?

SUBJECT: Sustainable Management Criteria slides 1-13 presented at the TAC meeting on Thursday October 3, 2019 (CONTINUED)

I compared slides 5-13 to the appropriate pages 20-29 entitled Undesirable Results of the “Draft Best Management Practices (BMPs) for Sustainable Management of Groundwater”. I found the following:

<u>Sustainability Indicator</u>	<u>Comment</u>
Reduction of Storage	- <u>slide 6 typographical correction needed:</u> change the “Interim Milestone”symbol on graph (slide 6) to be consistent with and and match “Interim Milestones” symbol on slides 8 & 9 (graphs). (Symbol is diagonal yellow square/blue lines.) -does not use historical data to reach measurable objective, only uses model scenario 6.2 -this fulfills GSP regulation/requirements that undesirable results be quantified by minimum thresholds exceedances

SUBJECT: Sustainable Management Criteria slides 1-13 presented at the TAC meeting on Thursday October 3, 2019 (CONTINUED)

I compared slides 5-13 to the appropriate pages 20-29 entitled Undesirable Results of the “Draft Best Management Practices (BMPs) for Sustainable Management of Groundwater”. I found the following:

(CONTINUED FROM 1 ST PAGE)

<u>Sustainability Indicator</u>	<u>Comment</u> (CONTINUED)
(continued)	
Reduction of Storage	-as set forth in pages 21-26 (BMPs) -uses model scenario 6.2 to satisfy measurable objective requirements to reach path of sustainable groundwater management
Chronic Lowering of Groundwater Levels	-<u>slides 8 & 9 typographical corrections are needed</u>: insert in title of each slide the word “Chronic” before the word “Lowering”. This will make it consistent with slide 7. -fulfills GSP regulation/requirements that undesirable results be quantified by minimum thresholds exceedances as set forth in pages 21-26 (BMPs) -uses model scenario 6.2 to satisfy measurable objective requirements to reach path of sustainable groundwater management
Degraded Water Quality	- fulfills GSP regulation/requirements that undesirable results be quantified by minimum threshold exceedances as set forth in pages 20-22(BMPs) -uses historical trends and model scenario 6.2 to satisfy measurable objective requirements to reach path of sustainable groundwater management
Land Subsidence	- fulfills GSP regulation/requirements that undesirable results be quantified by minimum threshold exceedances as set forth in pages 20-22(BMPs) -uses current rate of subsidence to satisfy measurable objective requirements to reach path of sustainable groundwater management

Recommendation: I accept slides 1-13 for the Sustainable Management Criteria chapter for the IWW basin GSP with typographical corrections incorporated.

From: Renee Westa-Lusk Member PAC of IWVGA

October 11, 2019

SUBJECT: Comments on GSP Implementation Chapter Outline Section 6

To evaluate the GSP Implementation Plan outline along with the draft GSP Implementation Schedule I went to the “Preparation Checklist for GSP Submittal” (which is published by the California Department of Water Resources) and compared the GSP Implementation Plan outline to page 8 of the Preparation Checklist which is entitled “Subarticle 5. Projects and Management Actions.

Section 6 is currently in a very brief outline form. So the outline was unable to go into depth of certain requirements or some items were not in Section 6 that are on the Preparation Checklist such as:

- 1) measurable objective that is expected to benefit from each project and management action**
- 2) circumstance for implementation**
- 3) permitting and regulatory process**
- 4) how the project or management action will be accomplished**
- 5) legal authority required**
- 6) estimated costs and plans to meet those costs**

Recommendation: I think some paragraphs of explanations need to be in Section 6 to supplement the slides of the outline (slides 1-6). The outline is way too brief and more written paragraphs are needed to explain things in a cohesive manner.