# Tuesday, November 23, 2021 at 2:30 p.m.

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Please Provide Public Comment by 12:00 pm the day of the meeting* by either email or mail.

E-mail comments to:
ekang@scvwa.org

- Or -

Mail comments to:

**Eunie Kang**
Santa Clarita Valley Groundwater Sustainability Agency
27234 Bouquet Canyon Road
Santa Clarita, CA 91350

*All written comments received after 12:00 pm the day of the meeting will be posted to **scvgsa.org** the next day. Disclaimer: Pursuant to the provisions of AB 361, which amends the Brown Act to allow legislative bodies or local agencies to meet remotely during declared emergencies under certain conditions, the public may not attend meetings in person. Public may use the above methods to attend and participate in the public board meetings.

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THOMAS BUNN III
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EUNIE KANG

# NOTICE AND AGENDA OF SPECIAL BOARD MEETING OF SANTA CLARITA VALLEY GROUNDWATER SUSTAINABILITY AGENCY BOARD

**Santa Clarita Valley Water Agency – Board Room**
**Rio Vista Treatment Plant Facility**
**27234 Bouquet Canyon Road**
**Santa Clarita, CA 91350**

**WEB AND TELECONFERENCE ONLY**
**NO PHYSICAL LOCATION FOR MEETING**

**Tuesday, November 23, 2021, at 2:30 PM**

**WEB AND TELECONFERENCING NOTICE**

Pursuant to the provisions of AB 361, which amends the Brown Act to allow legislative bodies or local agencies to meet remotely during declared emergencies under certain conditions, any Director may call into an Agency Board meeting using the Agency's **Call-In Number 1 (833) 568 8864, Webinar ID: 160 564 7992 or Zoom by clicking on the link** https://scvwa.zoomgov.com/j/1605647992 without otherwise complying with the Brown Act's teleconferencing requirements.

The public may not attend the meeting in person. Any member of the public may listen to the meeting or make comments to the Board using the call-in number or Zoom Webinar link above. Please see the notice below if you have a disability and require an accommodation in order to participate in the meeting.

We request that the public submit any comments in writing if practicable, which can be sent to ekang@scvwa.org or mailed to Eunie Kang, Board Secretary, Santa Clarita Valley Groundwater Sustainability Agency, 27234 Bouquet Canyon Road, Santa Clarita, CA 91350. All written comments received before 12:00 PM the day of the meeting will be distributed to the Board members and posted on the Santa Clarita Valley Water Agency website prior to the start of the meeting. Anything received after 12:00 PM the day of the meeting will be posted on the SCV-GSA website the following day.

## 1. REGULAR PROCEDURES

1.1 Call to Order

1.2 Pledge of Allegiance

1.3 Public Comments – Members of the public may comment as to items within the subject matter jurisdiction of the Agency that are not on the Agenda at this time. Members of the public wishing to comment on items covered in this Agenda may do so now or at the time each item is considered. (Comments may, at the discretion of the Board's presiding officer, be limited to three minutes for each speaker.)

1.4 Approval of Agenda

## 2. SPECIAL PROCEDURES

| | | | PAGE |
|---|---|---|---|
| 2.1 | * | Approve Continuation of Remote Meetings as Described in Assembly Bill 361 and Make Required Findings | 1 |

## 3. CONSENT CALENDAR

All matters listed under the Consent Calendar are considered to be routine and non-controversial and will be acted upon by the Board by one motion. There will be no separate discussion on these items prior to the time the Board votes unless any Board member, staff or the public, requests specific items be discussed and/or removed from the Consent Calendar for separate action.

| ITEMS | | | PAGE |
|---|---|---|---|
| 3.1 | * | Approve Minutes of the October 20, 2021, Santa Clarita Valley Groundwater Sustainability Agency Special Board of Directors Meeting | 5 |

## 4. DISCUSSION AND/OR ACTION AGENDA ITEMS

| ITEMS | | | PAGE |
|---|---|---|---|
| 4.1 | * | Discussion of Sustainable Management Criteria for Groundwater-Surface Water Interactions and Triggers for Groundwater Dependent Ecosystems (GDEs) | 9 |
| 4.2 | * | Draft Responses to Public Comments of the SCV-GSA Draft Groundwater Sustainability Plan (GSP)<br><br>Direct Link to Draft GSP:<br>https://share.gsiws.com/index.php/s/CrynwfbbiHFCqqT | 21 |
| 4.3 | * | Designation of SCV-GSA Board Voting Delegate for Association of California Water Agency (ACWA) Election for the 2022-2023 Term | 43 |
| 4.4 | * | Authorize Letter of Support for Santa Clarita Valley Water Agency's Saugus 3 & 4 Wells Project Grant Application | 47 |

## 5. DIRECTOR REQUESTS FOR FUTURE AGENDA ITEMS

## 6. ADJOURMENT

*** Indicates attachment**
**♦ To be distribute**

**NOTICES:**

Any person may make a request for a disability-related modification or accommodation needed for that person to be able to participate in the public meeting by telephoning Eunie Kang,

Secretary to the Board of Directors, at (661) 297-1600 or writing to Santa Clarita Valley Groundwater Sustainability Agency at 27234 Bouquet Canyon Road, Santa Clarita, CA 91350. Requests must specify the nature of the disability and the type of accommodation requested. A telephone number or other contact information should be included so that Agency staff may discuss appropriate arrangements. Persons requesting a disability-related accommodation should make the request with adequate time before the meeting for the Agency to provide the requested accommodation.

Pursuant to Government Code Section 54957.5, non-exempt public records that relate to open session agenda items and are distributed to a majority of the Board less than seventy-two (72) hours prior to the meeting will be available for public inspection at the Santa Clarita Valley Water Agency, located at 27234 Bouquet Canyon Road, Santa Clarita, California 91350, during regular business hours. When practical, these public records will also be made available on the Agency's Internet Website, accessible at http://www.scvgsa.org.

Posted on November 17, 2021

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**ITEM NO. 2.1**

# Santa Clarita Valley Groundwater Sustainability Agency Board Memorandum

**DATE:** November 23, 2021

**TO:** SCV-GSA Board of Directors

**FROM:** Thomas Bunn
General Counsel

**SUBJECT:** Approve Continuation of Remote Meetings as Described in AB 361 and Make Required Findings

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## SUMMARY/DISCUSSION:

At the October 20, 2021 adjourned Board meeting, pursuant to AB 361, the Board of Directors adopted Resolution No. GSA 2021-02 (attached) that authorized the Board to continue to have remote meetings based upon the continued state of emergency for COVID-19, and made findings that (1) A state of emergency related to COVID-19 is currently in effect; and (2) Los Angeles County officials have imposed or recommended measures to promote social distancing.

In order to continue to have remote meetings, AB 361 requires that the Board reaffirm those findings within 30 days after the first remote meeting, and every 30 days thereafter, provided that a state of emergency continues to be in place.

At the time this report was prepared, there is a continued state of emergency for COVID-19. This item is on the Agenda for the Board to consider whether to reaffirm the resolution and make the required findings to continue to have remote meetings for an additional 30 days. The resolution authorizes the Board to extend the Resolution by motion of the Board.

## FINANCIAL CONSIDERATIONS:

None at this time.

## RECOMMENDATION:

That the Board of Directors reaffirms Resolution No. GSA 2021-02 and finds that (1) A state of emergency related to COVID-19 is currently in effect; and (2) Los Angeles County officials have imposed or recommended measures to promote social distancing.

Attachment:
Resolution No. GSA 2021-02

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# RESOLUTION NO. GSA 2021-02

## A RESOLUTION OF THE BOARD OF DIRECTORS OF THE SANTA CLARITA VALLEY GROUNDWATER SUSTAINABILITY AGENCY AUTHORIZING VIRTUAL BOARD AND COMMITTEE MEETINGS PURSUANT TO AB 361

**WHEREAS,** the Santa Clarita Valley Groundwater Sustainability Agency ("Agency") is committed to preserving and nurturing public access and participation in meetings of the Board of Directors; and

**WHEREAS,** all meetings of the Agency's legislative bodies are open and public, as required by the Ralph M. Brown Act (Cal. Gov. Code 54950 – 54963), so that any member of the public may attend and participate in the Agency's meetings; and

**WHEREAS,** starting in March 2020, in response to the spread of COVID-19 in the State of California, the Governor issued a number of executive orders aimed at containing the COVID-19 virus; and

**WHEREAS,** among other things, these orders waived certain requirements of the Brown Act to allow legislative bodies to meet virtually; and

**WHEREAS,** pursuant to the Governor's executive orders, the Agency has been holding virtual meetings during the pandemic in the interest of protecting the health and safety of the public, Agency staff and Directors; and

**WHEREAS,** the Governor's executive order related to the suspension of certain provisions of the Brown Act expires on September 30, 2021; and

**WHEREAS,** on September 16, 2021 the Governor signed AB 361 (in effect as of October 1, 2021 – Government Code Section 54953(e)), which allows legislative bodies to meet virtually provided there is a state of emergency, and either (1) state or local officials have imposed or recommended measures to promote social distancing; or (2) the legislative body determines by majority vote that meeting in person would present imminent risks to the health and safety of attendees; and

**WHEREAS,** such conditions now exist in the Agency, specifically, a state of emergency has been proclaimed related to COVID-19, Los Angeles County officials are imposing and recommending measures to promote social distancing, and because of the ongoing threat of COVID-19.

**NOW, THEREFORE BE IT RESOLVED, THAT THE BOARD OF DIRECTORS OF THE SANTA CLARITA VALLEY GROUNDWATER SUSTAINABILITY AGENCY DOES HEREBY RESOLVE AS FOLLOWS:**

Section 1. Recitals. The Recitals set forth above are true and correct and are incorporated into this Resolution by this reference.

Section 2. Remote Teleconference Meetings. Consistent with the provisions of Government Code Section 54953(e), the Board of Directors finds and determines that (1) a state of emergency related to COVID-19 is currently in effect; and (2) local officials in Los Angeles County have imposed or recommended measures to promote social distancing in connection with COVID-19. Based on such facts, findings and determinations, the Board authorizes staff to conduct remote teleconference meetings of the Board of Directors, including Committee meetings, under the provisions of Government Code Section 54953(e).

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Section 3. Effective Date of Resolution. This Resolution shall take effect October 20, 2021 and shall be effective for 30 days or until this Resolution is extended by a majority vote of the Board of Directors in accordance with Section 4 of this Resolution.

Section 4. Extension by Motion. The Board of Directors may extend the application of this Resolution by motion and majority vote by up to 30 days at a time, provided that it makes all necessary findings consistent with and pursuant to the requirements of Section 54953(e)(3).

**PASSED AND ADOPTED** by the Board of Directors of the Santa Clarita Valley Groundwater Sustainability Agency this 20th day of October 2021, by the following vote:

AYES: Directors Atkins, Bryden, Cooper, Gibbs, Gutzeit, Martin, Natoli

NOES: None

ABSENT: None

ABSTAIN: None

President

I, the undersigned, hereby certify: That I am the duly appointed and acting Secretary of the Santa Clarita Valley Groundwater Sustainability Agency, and that at a adjourned meeting of the Board of Directors of said Agency held on October 20, 2021, the foregoing Resolution No. GSA 2021-02 was duly and regularly adopted by said Board, and that said resolution has not been rescinded or amended since the date of its adoption, and that it is now in full force and effect.

DATED: October 20, 2021

DocuSigned by:
Ennie Kang
7B4A57160C8841E...
Secretary

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DRAFT

ITEM NO. 3.1

Minutes of the Special Board Meeting of the Board of Directors of the Santa Clarita Valley Groundwater Sustainability Agency – October 20, 2021

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A special board meeting of the Board of Directors of the Santa Clarita Valley Groundwater Sustainability Agency (SCV-GSA) was held via web and teleconference at 2:00 PM on Wednesday, October 20, 2021. A copy of the Agenda is inserted in the Minute Book of the SCV-GSA preceding these minutes.

DIRECTORS PRESENT: B.J. Atkins, Russ Bryden, William C. Cooper, Maria Gutzeit, Gary Martin, Gina Natoli, Jason Gibbs

DIRECTORS ABSENT: None

Also present via web and teleconference: SCV-GSA General Counsel Tom Bunn, SCV-GSA Board Secretary Eunie Kang, SCV Water; Assistant General Manager Steve Cole, Director of Water Resources Dirk Marks, Principal Water Resource Planner Rick Viergutz, Communications Manager Kathie Martin, Tara Bravo CV Strategies, Jeff Barry GSI Water Solutions, Inc., Tom Barnes ESA Water; and various members of the public.

President Natoli called the meeting to order at 2:03 PM. A quorum was present.

Item 1.3: There was no public comment.

Item 1.4: Upon motion of Director Martin, seconded by Director Atkins and carried, the Agenda was approved by the following roll call votes:

| | | | |
|---|---|---|---|
| Director Atkins | Yes | Vice President Gutzeit | Yes |
| Director Bryden | Yes | Director Martin | Yes |
| Director Cooper | Yes | President Natoli | Yes |
| Director Gibbs | Yes | | |

Item 2.1: Upon motion of Director Atkins, seconded by Vice President Gutzeit and carried, the Board approved the Resolution No. GSA 2021-02 Authorizing Virtual Board and Committee Meetings Pursuant to Assembly Bill 361 with an amendment to remove the statement 'meeting in person would present imminent risks to the health and safety of attendees' by the following roll call votes:

| | | | |
|---|---|---|---|
| Director Atkins | Yes | Vice President Gutzeit | Yes |
| Director Bryden | Yes | Director Martin | Yes |
| Director Cooper | Yes | President Natoli | Yes |
| Director Gibbs | Yes | | |

**RESOLUTION NO. GSA 2021-02**

**A RESOLUTION OF THE BOARD OF DIRECTORS OF THE SANTA CLARITA VALLEY GROUNDWATER SUSTAINABILITY AGENCY AUTHORIZING VIRTUAL BOARD AND COMMITTEE MEETINGS PURSUANT TO AB 361**

**WHEREAS,** the Santa Clarita Valley Groundwater Sustainability Agency ("Agency") is committed to preserving and nurturing public access and participation in meetings of the Board of Directors; and

**WHEREAS,** all meetings of the Agency's legislative bodies are open and public, as required by the Ralph M. Brown Act (Cal. Gov. Code 54950 – 54963), so that any member of the public may attend and participate in the Agency's meetings; and

**WHEREAS,** starting in March 2020, in response to the spread of COVID-19 in the State of California, the Governor issued a number of executive orders aimed at containing the COVID-19 virus; and

**WHEREAS,** among other things, these orders waived certain requirements of the Brown Act to allow legislative bodies to meet virtually; and

**WHEREAS,** pursuant to the Governor's executive orders, the Agency has been holding virtual meetings during the pandemic in the interest of protecting the health and safety of the public, Agency staff and Directors; and

**WHEREAS,** the Governor's executive order related to the suspension of certain provisions of the Brown Act expires on September 30, 2021; and

**WHEREAS,** on September 16, 2021 the Governor signed AB 361 (in effect as of October 1, 2021 – Government Code Section 54953(e)), which allows legislative bodies to meet virtually provided there is a state of emergency, and either (1) state or local officials have imposed or recommended measures to promote social distancing; or (2) the legislative body determines by majority vote that meeting in person would present imminent risks to the health and safety of attendees; and

**WHEREAS,** such conditions now exist in the Agency, specifically, a state of emergency has been proclaimed related to COVID-19, Los Angeles County officials are imposing and recommending measures to promote social distancing, and because of the ongoing threat of COVID-19.

**NOW, THEREFORE BE IT RESOLVED, THAT THE BOARD OF DIRECTORS OF THE SANTA CLARITA VALLEY GROUNDWATER SUSTAINABILITY AGENCY DOES HEREBY RESOLVE AS FOLLOWS:**

Section 1. Recitals. The Recitals set forth above are true and correct and are incorporated into this Resolution by this reference.

Section 2. Remote Teleconference Meetings. Consistent with the provisions of Government Code Section 54953(e), the Board of Directors finds and determines that (1) a state of emergency related to COVID-19 is currently in effect; and (2) local officials in Los Angeles County have imposed or recommended measures to promote social distancing in connection with COVID-19. Based on such facts, findings and determinations, the Board authorizes staff to conduct remote teleconference meetings of the Board of Directors, including Committee meetings, under the provisions of Government Code Section 54953(e).

Section 3. Effective Date of Resolution. This Resolution shall take effect October 20, 2021 and

shall be effective for 30 days or until this Resolution is extended by a majority vote of the Board of Directors in accordance with Section 4 of this Resolution.

Section 4. Extension by Motion. The Board of Directors may extend the application of this Resolution by motion and majority vote by up to 30 days at a time, provided that it makes all necessary findings consistent with and pursuant to the requirements of Section 54953(e)(3).

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Item 3.1: The SCV-GSA Board of Directors honored and recognized the dedication and services to the SCV-GSA Stakeholder Advisory Committee Members for their support and many significant contributions.

- Holly Schroeder, Chair, Business Member
- Eric Adair, Vice Chair, Business Member
- Sandra Cattell, Environmental Member
- Matt Carpenter, At Large Pumper Member
- Stacy Fortner, Environmental Member
- Roger Haring, Small Pumper Member
- Dan Masnada, At Large Pumper Member
- Dennis Ostrom, Small Pumper Member
- Steve Sligh, At Large Pumper Member

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Item 4: Upon motion of Director Cooper, seconded by Director Atkins and carried, the Board approved the Consent Calendar by the following roll call votes:

| | | | |
|---|---|---|---|
| Director Atkins | Yes | Vice President Gutzeit | Yes |
| Director Bryden | Yes | Director Martin | Yes |
| Director Cooper | Yes | President Natoli | Yes |
| Director Gibbs | Yes | | |

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Item 5.1: Tara Bravo gave an overview of the SCV-GSA Draft Groundwater Sustainability Plan Public Workshop held virtually on August 25, 2021, with 38 participants. The event generated ten (10) questions/feedback and zero feedback form from attendees. In general, the workshop presentation was well received, and there was some final feedback for the staff. All questions and comments will be archived for the record and will be included in the final feedback report.

Item 5.2: Rick Viergutz and Jeff Barry presented an overview of the Draft Groundwater Sustainability Plan and high-level summary of the public comments received.

Item 5.3: Rick Viergutz presented a status update of the Sustainable Groundwater Plan (SGMA) Implementation Activities.
Topics covered:

- Technical and Outreach
- Fiscal and Grants
- Six Month Look Ahead

- Challenges/Opportunities
- Financial Considerations

Item 5.4: Upon motion of President Natoli, seconded by Director Cooper and carried, the Board approved for the Board Secretary to query the Board to schedule a special board meeting in the month of November 2021 and possibly a second special board meeting in the month of January 2022 by the following roll call votes:

| | | | |
|---|---|---|---|
| Director Atkins | Yes | Vice President Gutzeit | Yes |
| Director Bryden | Yes | Director Martin | Yes |
| Director Cooper | Yes | President Natoli | Yes |
| Director Gibbs | Yes | | |

Item 5.5: Rick Viergutz presented a status update on Bouquet Canyon Creek.

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Item 6: Director Atkins requested a continuous update on the status of the Bouquet Canyon Creek.

Item 7: The meeting was adjourned at 4:25 PM.

Eunie Kang, Board Secretary

ATTEST:

President of the Board

**ITEM NO. 4.1**

# Santa Clarita Valley Groundwater Sustainability Agency Board Memorandum

**DATE:** November 23, 2021

**TO:** SCV-GSA Board of Directors

**FROM:** SCV-GSA Staff

**SUBJECT:** Discussion of Sustainable Management Criteria for Groundwater-Surface Water Interactions and Triggers for Groundwater Dependent Ecosystems (GDEs)

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**SUMMARY:**

A presentation of the Draft GSP was provided to the Board on October 20, 2021. In response to recently received public comments, the Board requested Staff to expand upon information regarding development and proposed implementation of Sustainable Management Criteria (SMC) for depletion of interconnected surface water and associated processes relating to Groundwater Dependent Ecosystems (GDEs).

This Board Memorandum, and the forthcoming presentation to the Board of Directors describes use of the GDE evaluation process, including timing considerations for evaluating GDEs, implementation of management actions, including reduction or redistribution of groundwater extraction, and the resulting temporal response in groundwater elevations.


**DISCUSSION:**

Recognition of Habitat Value

The State's GSP regulations require that GSPs include Sustainable Management Criteria (SMC) for Surface Water Depletion, but the regulations also go on to state that other factors should be "considered" in the evaluation, including effects to GDEs.

At a high level the GSP regulations require that Surface Water Depletion caused by pumping does not create undesirable results to *beneficial uses of surface water including diversions and environmental uses.* The Public Trust Doctrine also requires protection of environmental uses. The SCV-GSA water budget analysis for future conditions tracks surface water flows, and finds that (even with climate change factored in) dry-weather (non-storm) surface water flows will largely be maintained. The analysis finds that while future stormwater flows may be slightly reduced because of climate change, the future volumes of dry-weather (non-storm) surface water flows will be a little less, but not significantly less than under present conditions (Attachment 1, Water Budget Figures 8-3 and 8-4 from Draft GSP). Over the long run, the GSP does not foresee undesirable results occurring with regard to Surface Water Depletion caused by pumping. As a proxy for measured depletion, Minimum Thresholds for Surface Water Depletion are set at the lowest predicted future minimum groundwater elevation at representative wells near the river. Ongoing monitoring data will be evaluated annually to assess whether these thresholds are appropriate.

Inventory of Groundwater Dependent Ecosystems

There is an additional layer of consideration for Surface Water Depletion regarding GDEs. As an initial step a team of technical experts mapped and characterized existing GDEs using existing data records and conducting field surveys. This work was conducted in a manner consistent with The Nature Conservancy's (TNC) recommendations for evaluating GDEs. The technical team led by ESA Consultants prepare a May 2020 report updating our understanding of the local GDE habitat and subsequently presented it to the Stakeholder Advisory Committee (SAC). In line with our presentation of this data to the SAC, staff is committed to further refine our knowledge of GDEs through ongoing observations proposed in the GSP monitoring plan.

Evaluation of Potential for Undesirable Results

With the potential GDE areas identified, we then evaluated what impacts to GDEs may be caused by groundwater pumping. Our work allowed us to recognize where the habitat for GDEs exists and what local conditions needed to be avoided to protect species from undesirable results caused by groundwater pumping.

For example, just upstream from I-5 in the Santa Clara River, Unarmored Threespine Stickleback (UTS) have been observed. This fish is a State Fully Protected fish and exists in shallow flowing surface water in this area. This segment of the river is marked by a narrowing of the river and thinning of alluvium due to geologic conditions. As a result, groundwater comes to the surface here providing habitat for the UTS. If groundwater pumping causes the surface water to disappear, it might mean a loss of UTS—clearly an undesirable result.

A map showing the monitoring area for GDEs is included as Attachment 2, Groundwater Monitoring Network for GDEs Figure 7-14 from Draft GSP.

Special Monitoring Wells and Triggers

The Draft GSP recommends use of special small diameter water wells, called piezometers, to carefully track groundwater elevations near the river. These wells are shown on Attachment 2. Monitoring data coupled with the GDE evaluation process over time will refine the GSA's understanding of how groundwater conditions may affect GDEs. The GSP identifies that if groundwater elevations in the special wells approach or reach the historic low water level (called the GDE trigger) or 2 feet above the historic low for selected areas such as upstream of the I-5 bridge, then the team will analyze the cause of lowered water levels, along with the potential for groundwater pumping to cause impacts to GDEs.

Importantly, the historic low groundwater elevation was selected as the trigger because habitat in the GDE area has demonstrated resiliency through historic low water levels in drought. The GDE area has also demonstrated resiliency following flood events.

Some public commenters have suggested these trigger levels may be set too low—meaning that if groundwater pumping was reasonably expected to cause undesirable results to GDEs, there may not be enough time to implement management actions to avoid undesirable results. The GSP team disagrees, and believes the approach for GDE triggers is sound, because it provides sufficient time to evaluate conditions and modify pumping if necessary. The trigger approach has wide support from many stakeholders and is also supported by guidance documents.

GDE Evaluation Process

The evaluation process is conducted in a reasonable time ahead of reaching GDE triggers, or if triggers are reached. The purpose of the evaluation is to identify if undesirable results to GDEs from groundwater pumping are anticipated. It also includes communication of an evaluation report to the SCV-GSA Board of Directors. The evaluation of GDEs includes six steps. These steps include evaluation of WRP flow, if historic low groundwater levels are already below root depths, if the GDE(s) would survive a temporary loss of access to groundwater/how quickly groundwater levels are anticipated to recover, frequency of reaching triggers, role of groundwater pumping in lowered water levels, and identification of new information that can be used to refine triggers. Attachment 3, Actions if GDE Triggers are Reached Section 9.5.1 of Draft GSP provides a discussion of this process.

Timing Considerations and Management Actions

The Draft GSP describes that if it appears groundwater pumping may lead to undesirable results to GDEs, management actions would be taken. As described in Attachment 3, these actions include but are not limited to reductions in groundwater pumping, importation of water, water conservation, and coordination with well owners and stakeholders. Implementation of these actions is designed to cause groundwater elevations to rise

GDE Evaluation and Management Action Process Example: Early Summer Condition

Trend Observance

It's mid-June, and a drought period begins to be evident in the Santa Clarita Valley. Groundwater elevations continue to decline. Monitoring of a GDE well identifies groundwater elevations are still well above the GDE trigger. Monitoring of this well continues.

GDE Evaluation Process (2-3 weeks)

It is now mid-July, summer-time temperatures are higher than normal, and the trend of the water level decline suggests that the trigger may be reached in 30-45 days. The GSP manager calls for implementing the GDE evaluation process. The evaluation includes calling on the contract biological resources consultant to evaluate and answer the six questions listed in the process. The team will seek to coordinate with local well operators and land owners to aid in evaluation.

A GDE evaluation report is prepared that describes if undesirable results are expected from groundwater pumping. If the report does not determine undesirable results are anticipated from pumping, the GSA may seek a subsequent evaluation report a reasonable time later for confirmation.

Implementation of Management Actions (1-2 weeks)

If the GDE evaluation report anticipates undesirable results from groundwater pumping, management actions are implemented. Management actions that will be considered include, but are not limited to, reduced pumping in one or more nearby wells until the trend is reversed. Selection of the appropriate management actions will depend upon determining what combination of actions would be most effective for mitigating the water level decline at the location where the monitoring data indicates an impact could occur.

Proof of Concept

GSA staff have performed modeling of a range of pumping reduction scenarios in a drought to assess how much and how quickly water levels respond to management actions. We looked at several pumping reduction scenarios at and upstream of GDE monitoring well locations that included shutting off pumping in progressively more wells. It was determined that reduced pumping can cause groundwater water levels to come up. The modeling results also indicate that pumping reductions do not eliminate all drought effects. Climate and reduced rainfall play a dominant role in water levels and both must be considered together when implementing management actions.

**FINANCIAL CONSIDERATIONS:**

None at this time.

**RECOMMENDATION:**

That the Board of Directors consider the material provided by staff in this report and provide staff direction in preparation of the final draft to be considered for adoption at the January 3, 2022 Board meeting.

Attachments:
Attachment 1 – Water Budget Figures 8-3 and 8-4
Attachment 2 - GDEs Map Figure 7-14 from Draft GSP
Attachment 3 - Actions if GDE Triggers are Reached Section 9.5.1 from Draft GSP

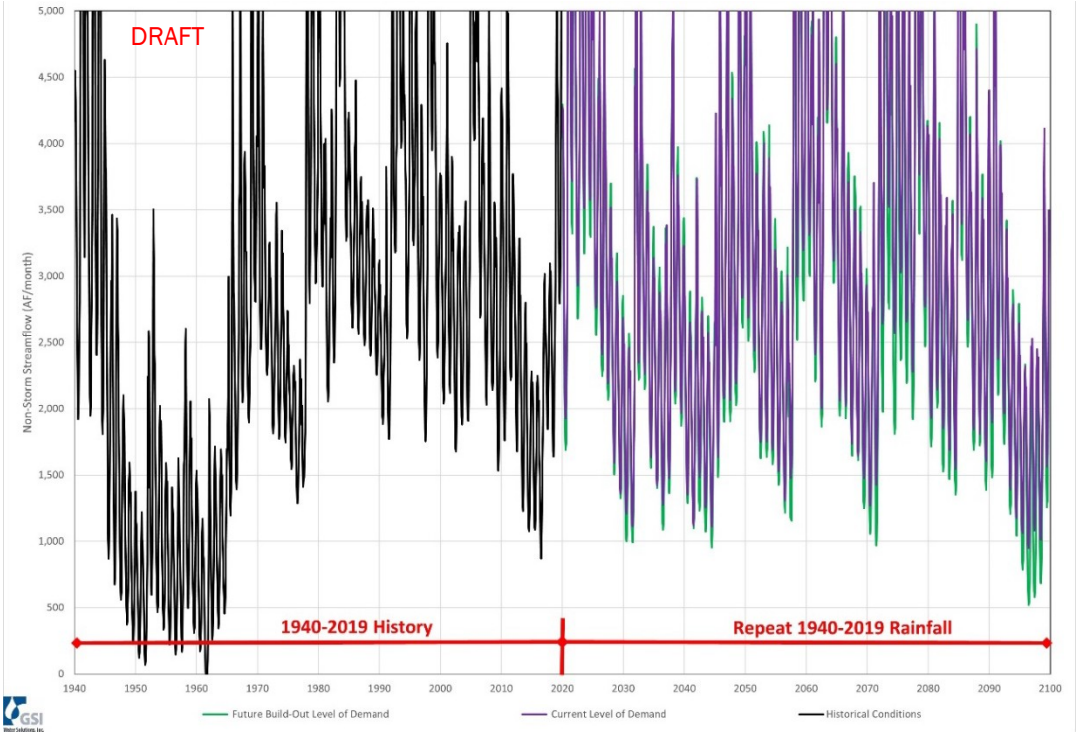


**Figure 8-3. Modeled Monthly Non-Storm Streamflows at Western Basin Boundary for Historical, Current, and Projected Levels of Groundwater Use**

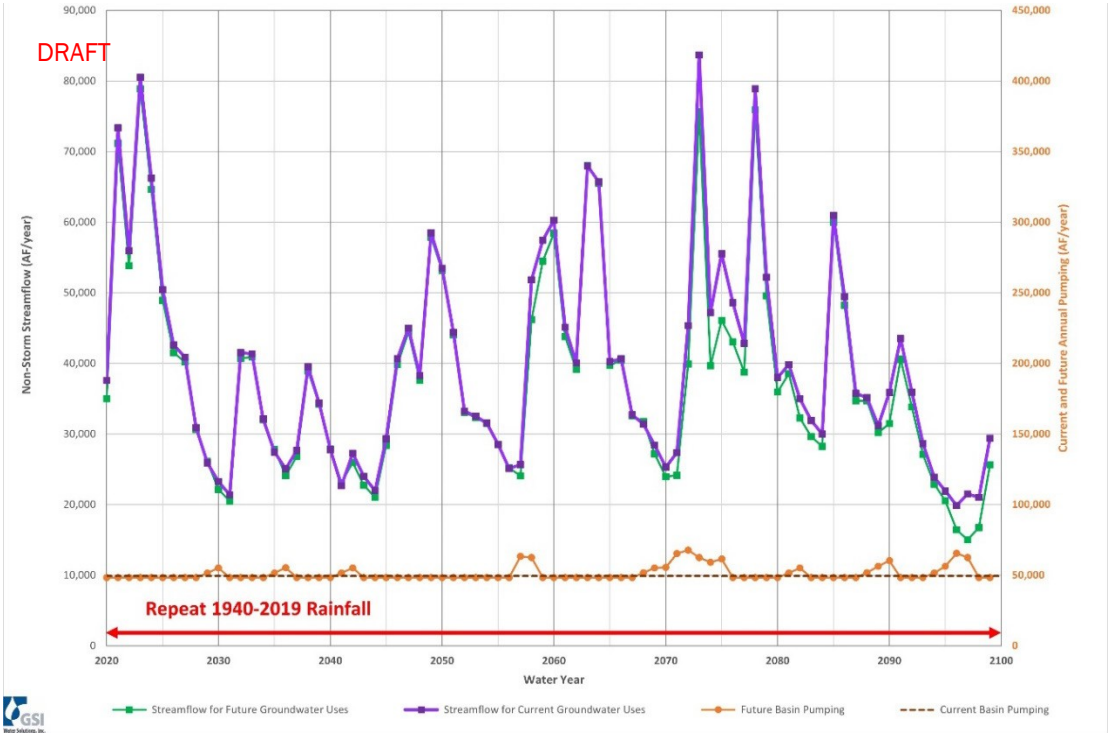


**Figure 8-4. Modeled Annual Non-Storm Streamflows at Western Basin Boundary for Current and Projected Levels of Groundwater Use**

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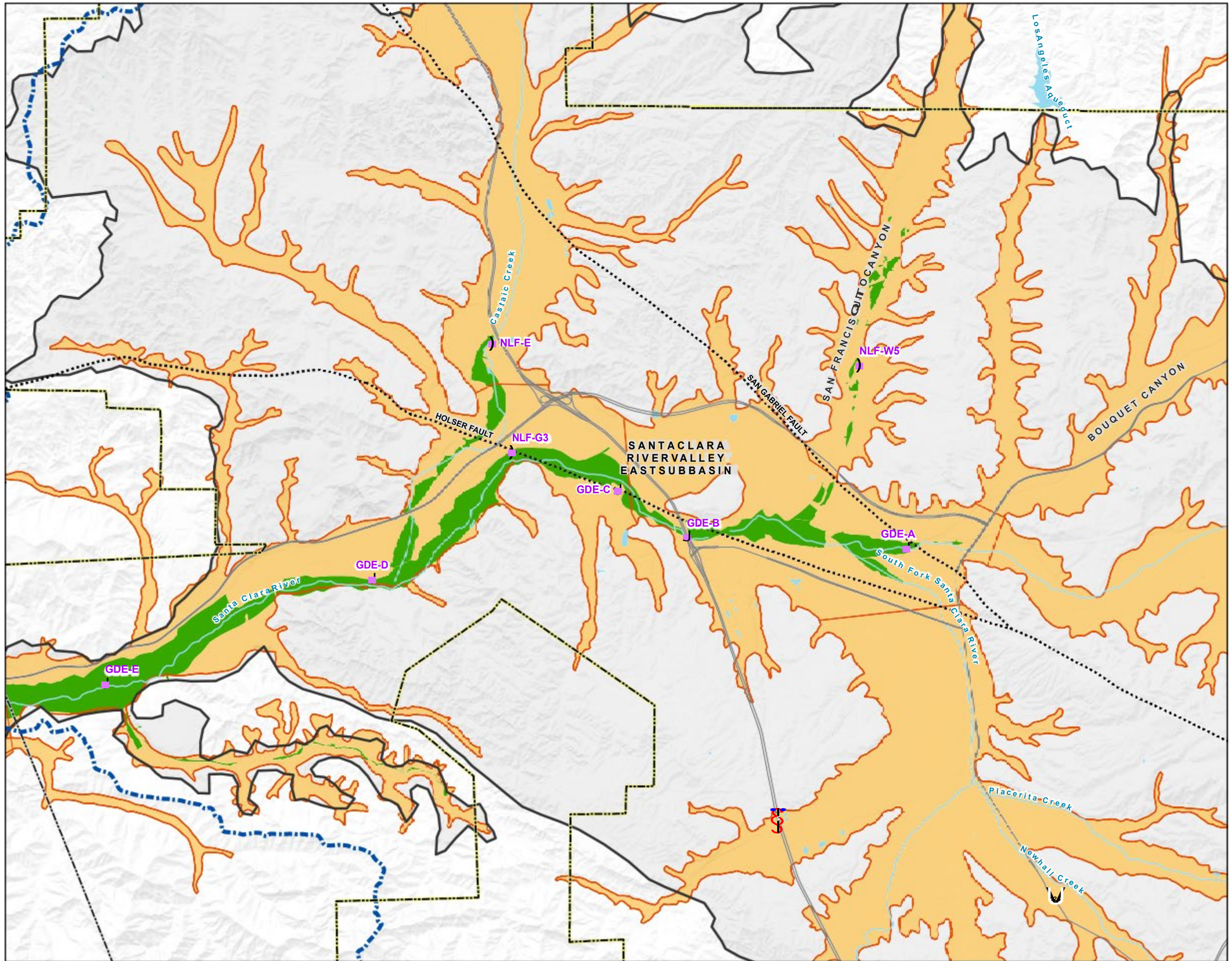
# FIGURE 7-14

## Groundwater Monitoring Network for GDEs

Santa Clara River Valley
East Groundwater Basin
Groundwater Sustainability Plan




**LEGEND**

**GDE Monitoring Well in the Alluvial Aquifer**

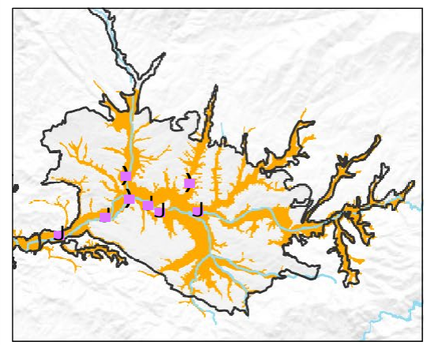
- Existing Observation Well
- New Observation Well (to be constructed)

**Phreatophyte Locations**

- Riparian Mixed Hardwood

**All Other Features**

- Santa Clara River Valley Groundwater Basin
- Alluvium
- Watershed Boundary
- Service Area Boundary for SCV Water
- Major Road
- Watercourse
- Waterbody



**NOTE:**
SCV Water: Santa Clarita Valley Water Agency

0 2,000 4,000 6,000
Feet

**DRAFT**

Date: April 1, 2021
Data Sources: USGS, DWR Bulletin 118, ESA

GSI Water Solutions, Inc.

Document Path: Y:\0420_CLWA\Source_Figures\019_EastSubbasinGSP\SCV_Report\Figure8-2_GW_Monitoring_Network_GDEs.mxd, abarry

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## 9.5.1 Actions if GDE Action Triggers are Reached

### 9.5.1.1 Evaluation Process When Action Triggers Are Reached

Section 8 states that when an action trigger (a historical low groundwater level in GDE monitoring wells) is reached, an evaluation process will be initiated to determine whether the lowered groundwater levels and possible surface water depletion are a result of pumping and could result in a significant and unreasonable effect to GDEs. The Monitoring Plan presented in Section 7 includes a process to report the trigger event to the GSA Board as needed with an accompanying Evaluation Report that evaluates the need for management actions to be implemented. Management actions would be implemented if the lowering groundwater levels could result in permanent loss or significant degradation of existing native riparian or aquatic habitat due to groundwater extraction throughout the GDE area or temporary loss of essential habitat to unarmored three-spine stickleback (UTS) (sensitive aquatic species in the vicinity of I-5 Bridge) as a result of cessation of surface flow during low-flow conditions in the river channel caused by groundwater extraction. Several questions have been identified below that may shed light on the significance of lowered groundwater levels. Refer to Figure 7-13 in Section 7 for the locations of the river segments and GDE monitoring sites.

Questions that will be addressed as part of this evaluation process include, but are not limited to, the following:

1. **Is the affected river segment supported by surface flow from water reclamation plant (WRP) discharges? (Surface water may support habitats during temporary periods of lower-than-normal groundwater levels.)**

   Surface water is generally persistent from the Valencia WRP to the basin boundary. The Evaluation Report may document that streamflows are persistent even with lowered groundwater levels. If streamflows are not present downstream of the location of the Valencia WRP outfall, then the Evaluation Report would conclude that surface flows are not sustaining vegetation during the historically low groundwater period, and further evaluation of the following questions may lead to management actions.

2. **Is the historically low groundwater level already below the tree/shrub root depths? (If so, further declines in the same year may not affect GDEs.)**

   The Evaluation Report may rely on topographic data and depth-to-groundwater data from recent monitoring well readings to determine whether groundwater levels are below tree/shrub root depths. The existing vegetation may not be relying on groundwater in areas where temporary drawdowns of the water table to depths of 15 feet or more occur regularly. An elevation survey of the thalweg may be helpful to estimate root zone areas in the affected reach. In areas where groundwater is lowered more than 2 or 3 feet below historically low levels, GDEs may be disconnected from their water source to an unprecedented degree. In these areas, management actions may be warranted.

3. **Will the GDEs survive the temporary loss of access to groundwater? (Depending on the season, groundwater levels may be expected to rise above historically low levels within a month or two, avoiding permanent loss of habitat. When groundwater levels are restored sufficiently quickly in the winter months, effects to GDEs may not be significant.)**

   The Evaluation Report should provide a qualitative assessment of the duration that lower groundwater levels may occur during a specific season, if water levels will recover initially with cooler temperatures in the fall and then more substantially following rain events. If action triggers are reached early in the year, then the GDEs may experience more stress than if the triggers are reached late in the hot weather season. The Evaluation Report may recommend initiating vegetation monitoring to assess whether drought stress is visible in the river segment. If vegetation is showing signs of stress that are attributable to historically low groundwater levels, then the Evaluation Report will be updated, and management

actions may be warranted. For the aquatic habitat where sensitive aquatic species are located in Segment 1 (e.g., UTS present near the I-5 Bridge), any temporary loss of surface flow is to be avoided with management actions before it occurs.

4. **Has the action trigger been reached often in recent years? Droughts that lower groundwater levels are a natural occurrence, but do not occur every year. To sustain GDEs over the long term, groundwater levels affected by drought conditions must recover sufficiently quickly and remain higher during most years in order to support healthy, sustainable habitats over the long term.**

   The Evaluation Report should report the frequency with which the action triggers have been reached. If the action triggers have been reached more than two or three times within a 10-year period, the Evaluation Report may recommend initiating vegetation monitoring to assess for recurring stress and gradual degradation of habitat. If a gradual decline in habitat quality is seen because of pumping that may lead to undesirable results, then the Evaluation Report will be updated, and management actions may be warranted.

5. **Are the declines in groundwater levels resulting from pumping?**

   The analysis described in Section 9.5.3.1 will be performed to assess the effect of pumping versus drought conditions. Pumping data from wells that are known to be pumping in the Basin will be compiled. Historical pumping rates will be compared to current pumping rates recorded for the recent past (i.e., in previous months). If current pumping rates are less than or equal to historical pumping rates, then the Evaluation Report may conclude that further reductions in current pumping rates are not warranted because GDEs have survived during historical droughts when higher pumping rates and/or historically lower low water levels were observed. If unprecedented drought conditions or other changes in the water balance of the Basin are contributing to the condition, then the GSA may consider actions that could be taken to further ensure that undesirable results are avoided.

6. **Has new information been obtained that can be used to refine the action trigger levels presented in Section 8?**

   The Evaluation Report should provide the context for developing recommendations on future evaluation, monitoring, and action items. If new information becomes available regarding the resilience or sensitivity of the GDEs and the special status species that rely on the habitat values, then the Evaluation Report should identify this updated information and recommend management actions as needed to avoid undesirable results. This may include refining the action trigger level over time to better correlate with the potential for undesirable results.

#### 9.5.1.2 Evaluation Report

The information gathered for Section 9.5.4.1 will be discussed in an Evaluation Report. The report will include recommendations for ongoing monitoring, or implementation of management actions and will include justification for the conclusions.

#### 9.5.1.3 Presentation to the GSA Board

Evaluation Reports will be presented to the GSA Board quarterly, or more frequently if necessary.

#### 9.5.1.4 Possible Management Actions If GDE Action Triggers Are Reached

The Evaluation Report may conclude that the lowered groundwater levels do not represent significant and unreasonable effects to GDEs in areas where GDEs are resilient and where sensitive species would be expected to persist during the drought and fully recover with the return of wet weather. However, there are priority areas in the river system (e.g., I-5 Bridge area where UTS may be found) that may not be resilient to

future unprecedented drought conditions. If these areas are threatened with temporary loss of surface flows for any duration, then management actions would be necessary.

If during future unprecedented multi-year droughts that were not simulated during development of this GSP reduction of pumping does not avoid significant effects and impacts to GDEs, then the GSA will consult with the U.S. Fish and Wildlife Service (USFWS) and CDFW to develop emergency measures to avoid significant effects to sensitive species.

If significant and unreasonable effects are anticipated, then any necessary management actions would be implemented in a timely manner as described below:

1. The GSA in coordination with groundwater pumpers may assess the potential to:

   - Shift pumping to another location to reduce impact on GDEs, and/or
   - Stop pumping in wells near the GDEs, and/or
   - Increase the quantity of imported water into the Basin

   Should any of the above be a consideration, the groundwater flow model may also be used to determine optimum pumping locations/aquifer most likely to avoid undesirable results.

2. The GSA may coordinate with SCV Water to consider implementing a mandatory water conservation program so that overall pumping in the Basin can be reduced.

3. If the evaluation shows that non municipal production wells are contributing to the problem, then the GSA will conduct outreach up to and including meetings with private well owners and stakeholders to discuss how to best respond to the concern. Ideally, this would occur prior to the time when significant and unreasonable impacts to GDEs are observed.

4. If monitoring data and weather predictions indicate that undesirable results are likely to persist into the following year and the above actions are not likely to mitigate the impacts, then it may be necessary to develop additional projects designed to increase the amount of water in the river system as described in Section 9.6.3.

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**ITEM NO. 4.2**

# Santa Clarita Valley Groundwater Sustainability Agency Board Memorandum

**DATE:** November 23, 2021

**TO:** SCV-GSA Board of Directors

**FROM:** SCV-GSA Staff

**SUBJECT:** Draft Responses to Public Comments of the SCV-GSA Draft Groundwater Sustainability Plan (GSP)

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**SUMMARY:**

Preparation of the Groundwater Sustainability Plan (GSP) for the Santa Clara River East Subbasin is nearing completion. The final steps include consideration of public comments, additional outreach and public engagement efforts, a public workshop and adoption currently scheduled for January 3, 2022. This report summarizes the current status of these items.


**DISCUSSION:**

Response to Public Comments

The public draft GSP was distributed for a 60-day public comment period, ending October 15, 2021. A presentation of the Draft GSP was then provided to the Board October 20, 2021, when staff also summarized public comments received to date. While Staff provided some initial high-level responses, it recognized the need to undertake a thorough analysis in order to prepare potential modifications to the plan as well as prepare responses to those comments. The attachment shows the results of that analysis.

Ongoing Opportunities to Provide Input

While the 60-day public comment period on the GSP closed, additional opportunities remains for outreach and public engagement. Opportunities include but are not limited to, new special outreach to Disadvantaged Communities (DACs), and ongoing public outreach for GSA Board meetings.

Outreach efforts for today's meeting, as well as the public hearing scheduled for January 3, 2022, include the following:

- Social media posts (Facebook, Instagram and Twitter)
- Emails to the GSA contact list as well as the greater Agency distribution list (about 20,000 names)
- Update to the SCV-GSA website
- Digital and print ads with The Signal
- Printed handout delivered to businesses or communities within identified DACs.

**FINANCIAL CONSIDERATIONS:**

None at this time.

**RECOMMENDATION:**

That the Board of Directors consider the material provided by staff in this report and provide staff direction in preparation of the final draft to be considered for adoption at the January 3, 2022 Board meeting.

Attachment:
Draft Table of Public Comments and Proposed Responses

## TNC et al. Comment Letter

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
|---|---|---|---|---|---|
| TNC et al. | Identification of Key Beneficial Uses and Users | Disadvantaged Communities and Drinking Water Users | The GSP fails to identify and map the locations of DACs, and describe the size of each DAC population within the subbasin. | Describe and map the locations of DACs and provide the size of each DAC population. The DWR DAC mapping tool can be used for this purpose. | A map was prepared showing the DAC areas that are reflected in the DWR DAC mapping on-line tool compared to the subbasin area. The majority of the DAC areas lie completely within the subbasin with some others crossing the basin boundary, A table is included in the map showing the population of each DAC area as well as its acreage within the subbasin. The table also shows the water supplier of each DAC and any adjustments to the population and acreage of the DAC due to boundary overlap. |
| TNC et al. | Identification of Key Beneficial Uses and Users | Disadvantaged Communities and Drinking Water Users | The GSP provides a map of domestic well density in Figure 3-6, but fails to provide depth of these wells (such as minimum well depth, average well depth, or depth range) within the subbasin. | Include a map showing domestic well locations and average well depth across the subbasin. | Comment Noted. A new map has been added that shows the average well depth at various locations in the Basin. |
| TNC et al. | Identification of Key Beneficial Uses and Users | Disadvantaged Communities and Drinking Water Users | The GSP fails to identify the population dependent on groundwater as their source of drinking water in the subbasin. Specifics are not provided on how much each DAC community relies on a particular water supply (e.g., what percentage is supplied by groundwater). | Identify the sources of drinking water for DAC members, including an estimate of how many people rely on groundwater (e.g., domestic wells, state small water systems, and public water systems). | There are two unmapped DACs that the GSA knows of that are not listed on the DWR mapping tool website. These include the LARC Ranch and Lily of the Valley Mobile Home Park along Bouquet Canyon Road. GSA member agency, Santa Clarita Valley Water Agency, is currently working with the State and others to replace the private well water supply at these locations with an alternate municipal supply from SCV Water. Once these projects are completed, it is anticipated that all DAC areas within the subbasin will be serviced by SCV Water's municipal supply and that no DAC will rely on groundwater. |
| TNC et al. | Identification of Key Beneficial Uses and Users | Interconnected Surface Waters | The GSP does not provide an overall map showing the interconnected and disconnected reaches. | In addition to the maps showing gaining and losing reaches, provide an additional map that shows interconnected and disconnected reaches. State clearly in the text that losing reaches do not equate to disconnected reaches. | Section 5.2 of the GSP discusses an evaluation of the interconnection between groundwater and surface water, including a discussion of where the river is gaining and loosing and where it is disconnected from the groundwater system. Details regarding the interconnection are also discussed in Section 5.3 and in Table 5-4. |
| TNC et al. | Identification of Key Beneficial Uses and Users | Groundwater Dependent Ecosystems | The GSP took initial steps to identify and map GDEs using the Natural Communities Commonly Associated with Groundwater dataset (NC dataset) and other sources. However, we found that mapped features in the NC dataset were improperly disregarded. NC dataset polygons were incorrectly removed in areas adjacent to irrigated fields or in floodplains due to the presence of surface water. However, this removal criteria is flawed since GDEs, in addition to groundwater, can rely on multiple water sources – including flood flows or shallow groundwater receiving inputs from irrigation return flow from nearby irrigated fields – simultaneously and at different temporal/spatial scales. NC dataset polygons adjacent to irrigated land or in floodplains can still potentially be reliant on shallow groundwater aquifers, and therefore should not be removed solely based on this factor. | Use depth-to-groundwater data from multiple seasons and water year types (e.g., wet, dry, average, drought) to determine the range of depth to groundwater around NC dataset polygons. We recommend that a baseline period (10 years from 2005 to 2015) be established to characterize groundwater conditions over multiple water year types. Refer to Attachment D of this letter for best practices for using local groundwater data to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer.<br>If insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons as "Potential GDEs" in the GSP until data gaps are reconciled in the monitoring network. | As described in Section 5.3, the TNC GDE identification method was used to identify potential GDEs in the watershed, including the steps of removing non GDE polygons from the dataset. The GSP appropriately reviewed and field verified GDE polygons. Some habitat inventoried in the public databases identify vegetation near golf courses and other man-made features where vegetation is supported by surface runoff rather than groundwater. These areas were field verified and removed from the GDE inventory. Upland vegetation and arroyo wash scrub were also removed. Furthermore, the GSP provides an extensive record of groundwater depth fluctuations over a prolonged hydrologic period. Depth to groundwater varies throughout the watershed seasonally and annually, and applying a universal baseline depth does not provide a reliable or accurate picture of where and when vegetation is supported by groundwater. Rather, the GSP uses field verified vegetation mapping to recognize where GDEs actually exist. This method is consistent with the TNC Guidance, and includes a map of "Potential GDEs" as recommended in the comment. When a 30-foot depth to groundwater filter is applied, some polygons are removed from the "potential GDE" map. |

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
|---|---|---|---|---|---|
| TNC et al. | Identification of Key Beneficial Uses and Users | Groundwater Dependent Ecosystems | To analyze GDEs based on groundwater levels, the GSP states that (p. 5-95) “data is taken conservatively from modeled groundwater depths throughout the Basin in the late dry season (September) during a wet year (2011).” We recommend using groundwater data from multiple seasons and water year types to determine the range of depth to groundwater around NC dataset polygons. | Provide depth-to-groundwater contour maps, noting the best practices presented in Attachment D. Specifically, ensure that the first step is contouring groundwater elevations, and then subtracting this layer from land surface elevations from a digital elevation model (DEM) to estimate depth-to-groundwater contours across the landscape. | Depth to groundwater dynamically changes seasonally and annually responding to precipitation patterns. The GSP includes water level elevation contour maps and water level hydrographs that were used to identify GDEs. Groundwater elevations vary significantly depending on season and year type. Groundwater levels consistently decline through the summer months, so using the late October results is conservative when assessing lowest groundwater levels. Similarly, use of a wet year for estimating groundwater levels relative to potential GDEs provides for a conservatively high groundwater level and ensures that GDEs are not removed from the inventory due to periods of low groundwater levels. The high groundwater elevation contours were compared to ground surface elevations to determine where groundwater is or has been within 30 feet of ground surface. These areas were then compared to the potential GDE mapping to generate the GDE distribution map shown on Figure 5-60. |
| TNC et al. | Identification of Key Beneficial Uses and Users | Groundwater Dependent Ecosystems | Table 5-6 presents the locations and the historical low groundwater levels of GDE monitoring wells (GDE-A through GDE-E). However, on Figure 7-14 (Section 7.3.8.2), wells GDE-A through GDE-E are labeled "New Observation Well (to be constructed)”. | Clear up the conflicting information in the GSP about GDE monitoring wells (GDE-A through GDE-E). Table 5-6 presents the locations and the historical low groundwater levels of these wells. However, Figure 7-14 (Section 7.3.8.2) labels wells GDE-A through GDE-E as "New Observation Well (to be constructed)”. | Monitoring wells GDE-A through GDE-E had not been constructed at the time the draft went out. They are being constructed at the present time. The historical water levels shown for these well locations are predicted water levels for the historical period using the calibrated groundwater flow model. We used these predicted levels to select interim triggers and minimum thresholds and plan to revise them after we have collected sufficient water level data from the new wells. This will be accomplished by correlating the actual measured water levels with what the model predicts. We may modify the trigger levels once we have completed this correlation. The GSP describes this plan. |
| TNC et al. | Identification of Key Beneficial Uses and Users | Native Vegetation and Managed Wetlands | Managed wetlands are not mentioned in the GSP, so it is not known whether or not they are present in the subbasin. | State whether or not there are managed wetlands in the subbasin. If there are, ensure that their groundwater demands are included as separate line items in the historical, current, and projected water budgets. | The GSP identifies all the habitat in the watershed that is sustained or could be sustained by groundwater and there are no managed wetlands in the basin. |
| TNC et al. | Engaging Stakeholders | Stakeholder Engagement during GSP Development | The opportunities for public involvement and engagement are described in very general terms. They include public notices, opportunities for public comments provided at GSA board meetings and hearings, and attendance at public workshops. There is no specific outreach described for DACs or domestic well owners, or a plan for public engagement during the GSP’s implementation phase.<br>The Communications & Engagement Plan does not include outreach and engagement that is specifically directed to environmental stakeholders during the GSP’s development or implementation phases. | Include a more detailed and robust Communications & Engagement Plan that describes active and targeted outreach to engage DACs, domestic well owners, and environmental stakeholders during the remainder of the GSP development process and throughout the GSP implementation phase. Refer to Attachment B for specific recommendations on how to actively engage stakeholders during all phases of the GSP process. | As outlined in the CEP, the Department of Water Resources Disadvantaged Community Mapping Tool was used to search for Disadvantaged Communities (DACs) in the basin, and it identified certain areas in the basin as meeting the definition of a DAC.<br>Efforts are under way via the Proposition 1 Disadvantaged Community Involvement Program, locally led by the Upper Santa Clara River Integrated Regional Water Management Planning (USCR IRWM) group, to reach out to DACs in the basin. Though the outreach is not specific to the SCV-GSA, member agencies of the SCV-GSA are members of the USCR IRWM and use its stakeholder meetings to provide updates on the GSP development. The USCR IRWM also attends meetings of the Lower Santa Clara River IRWM (in Ventura County), and provides updates to its stakeholders on GSP development too.<br>As described in the draft GSP, and further with text clarifications and mapping, the state mapped DAC communities overly the municipal water system and, in some cases, open space or pasture. Two non-stated mapped DACs were identified in Bouquet Canyon that have had ongoing supply issues with their private wells, and a GSA member agency (SCV Water) is working with the state and others to bring in water supply to these locations. The GSA is not aware of State-mapped DAC impacts from lack of available groundwater as users (except for open space and pasture/farm) have a connection to safe potable water. Additional communication to state-mapped DACs has been made, as well as to non-state-mapped DACs to advise them of GSP development and Board meetings. During GSP implementation, additional DAC outreach will be conducted. |

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| | | | | | Additionally, for the process of final review and adoption of the Draft GSP, printed information was delivered to businesses and communities located within the identified DACs.<br>The CEP will be revised to include outreach for the plan implementation phase, and will further describe these efforts. |
| TNC et al. | Considering Beneficial Uses and Users When Establishing SMCs and Analyzing Impacts on Beneficial Uses and Users | Disadvantaged Communities and Drinking Water Users | For chronic lowering of groundwater levels, the GSP does not analyze direct and indirect impacts on DACS or drinking water users when defining undesirable results, or evaluate the cumulative or indirect impacts of proposed minimum thresholds on these stakeholders. | Describe direct and indirect impacts on DACs and drinking water users when defining undesirable results for chronic lowering of groundwater levels.<br>Consider and evaluate the impacts of minimum thresholds and measurable objectives on DACs and drinking water users within the subbasin. Further describe the impact of reaching or passing the minimum threshold for these users. For example, provide the number of domestic wells that would be de-watered at the minimum threshold. | The GSP does not contain a specific discussion on undesirable results from chronic lowering of water level to DACs, or private well operators in general, because the GSPs evaluation of chronic lowering of water levels identifies that chronic lowering of water levels have not occurred historically, nor are chronic lowering of water levels foreseen in future groundwater model simulations that consider climate change. As stated elsewhere in this response, the GSA has found DACs, such as in key neighborhoods, receive municipal water supply, as opposed to water supply through individual domestic wells. A GSA member agency has initiated work to bring a water line up to two locations in Bouquet Canyon to provide an alternate water supply to two communities. |
| TNC et al. | Considering Beneficial Uses and Users When Establishing SMCs and Analyzing Impacts on Beneficial Uses and Users | Disadvantaged Communities and Drinking Water Users | The GSP states (p. 8-30): “Minimum thresholds pertaining to salts and nutrients measured in groundwater are as follows: concentrations of TDS, chloride, nitrate, and sulfate that exceed WQOs and basin-wide assimilative capacity described in the 2016 SNMP in 20 percent of wells monitored in each management zone.” The GSP states that no minimum thresholds have been established for contaminants because state regulatory agencies, including LARWQCB and DTSC, have the responsibility and authority to regulate and direct actions that address contamination. However, in addition to coordinating with water quality regulatory programs, SMCs should be established for all Constituents of Concern (COC) in the subbasin impacted by groundwater use and/or management. Naturally occurring COCs can be exacerbated as a result of groundwater use or groundwater management within the subbasin. For degraded water quality, the GSP only includes a very general discussion of impacts to DACs or drinking water users when defining undesirable results and evaluating the cumulative or indirect impacts of proposed minimum thresholds. | Describe direct and indirect impacts on DACs and drinking water users when defining undesirable results for degraded water quality. For specific guidance on how to consider these users, refer to “Guide to Protecting Water Quality Under the Sustainable Groundwater Management Act.”<br>Set minimum thresholds and measurable objectives for water quality constituents within the subbasin including naturally occurring constituents that can be exacerbated as a result of groundwater use or groundwater management. Ensure they align with drinking water standards.<br>Evaluate the cumulative or indirect impacts of proposed minimum thresholds for degraded water quality on DACs and drinking water users. | Domestic wells in the basin were identified based on DWR records (refer to Figure 3-6). LARC Ranch and Lily of the Valley Mobile Home Park are within identified DAC areas and presently utilize private wells. There are other private drinking water wells in many of the side canyons. The GSP recognizes a data gap in private well water quality, and during GSP implementation efforts are planned to conduct outreach to private well owners to seek owner volunteers to allow water quality samples to be collected from their wells. The GSA would fund the laboratory analyses. Further, the GSP identifies that if monitoring data identifies MCL exceedances at private wells, an evaluation by the GSA would then take place. The evaluation may lead to coordination with regulatory agencies, and/or support in provision of alternate water supplies. |

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| TNC et al. | Considering Beneficial Uses and Users When Establishing SMCs and Analyzing Impacts on Beneficial Uses and Users | Groundwater Dependent Ecosystems and Interconnected Surface Waters | The GSP states (p. 5-97): "The existing GDEs have been sustained through a recent drought (2012–2016) that resulted in historically low groundwater levels. Table 5-6 summarizes the historical lows recorded in several representative locations along the river corridor. Figure 5-61 identifies these locations. When groundwater levels are above these recorded temporary historical lows, it can be inferred that GDEs are not significantly and unreasonably affected." However, no evidence of GDE impacts during the 2012-2016 drought were provided. By assuming that GDEs can be sustained on historic low groundwater levels (or lower) and the subbasin is allowed to operate at or close to those levels over many years, there is a risk of causing catastrophic damage to ecosystems that are more adverse than what was occurring at the height of the 2012-2016 drought. | When defining undesirable results for chronic lowering of groundwater levels, provide specifics on what biological responses (e.g., extent of habitat, growth, recruitment rates, alterations in fish spawning/rearing/migration) would best characterize a significant and unreasonable impact to GDEs. Undesirable results to environmental users occur when 'significant and unreasonable' effects on beneficial users are caused by one of the sustainability indicators (i.e., chronic lowering of groundwater levels, degraded water quality, or depletion of interconnected surface water). Thus, potential impacts on environmental beneficial uses and users need to be considered when defining undesirable results in the subbasin. Defining undesirable results is the crucial first step before the minimum thresholds can be determined. When establishing SMC for the basin, please consider that the SGMA statute [Water Code §10727.4(l)] specifically calls out that GSPs should include "impacts on groundwater dependent ecosystems". | The GSP provides detailed description of the potential adverse effects of surface water depletion on GDEs. Appendix E of the GSP includes a technical memorandum outlining considerations of effects to GDEs, consistent with SGMA requirements. The GSP specifically and fully addresses potential effects to GDEs and outlines a robust monitoring program that includes action triggers and management actions to ensure adverse effects to GDEs are avoided. |
| TNC et al. | Considering Beneficial Uses and Users When Establishing SMCs and Analyzing Impacts on Beneficial Uses and Users | Groundwater Dependent Ecosystems and Interconnected Surface Waters | Similarly, the GSP sets the minimum threshold for depletion of interconnected surface water as the surface water depletion caused by groundwater extraction as measured by groundwater levels falling below the lowest predicted future groundwater elevation measured at GDE-area monitoring wells. However, the true impacts to ecosystems under this scenario are not fully discussed in the GSP. The GSP does not explain how the chosen minimum thresholds and measurable objectives avoid significant and unreasonable effects on surface water beneficial users in the subbasin, such as increased mortality and inability to perform key life processes (e.g., reproduction, migration). | When defining undesirable results for depletion of interconnected surface water, include a description of potential impacts on instream habitats within ISWs when minimum thresholds in the subbasin are reached. The GSP should confirm that minimum thresholds for ISWs avoid adverse impacts to environmental beneficial users of surface and groundwater as these environmental users could be left unprotected by the GSP. These recommendations apply especially to environmental beneficial users that are already protected under pre-existing state or federal law. | The GSP provides a comprehensive inventory of habitat types within the entire watershed that are dependent on groundwater. This includes instream aquatic habitats supporting fishes and amphibians. The GSP characterizes the dry summers and prolonged dry periods that are common historically in southern California. The eastern portion of the watershed is characterized by dry washes and arroyo-type vegetation. The GSP appropriately characterizes the semi-arid climate and inventories GDEs as the existing vegetation that is connected to groundwater (continually saturated zone) at any point. The GSP is not responsible for creating habitat in areas where natural hydrology could not sustain it. The GSP outlines a monitoring plan and trigger levels to ensure that management actions are implemented to prevent pumping-related impacts. As part of the process for establishing minimum thresholds for Interconnected Surface Water, trigger levels have been established above minimum thresholds that are intended to be protective of GDEs. If water levels approach trigger levels established at GDE monitoring wells, the GSP calls for conducting an evaluation of conditions to determine if impacts are likely and of so, implementation of management actions to protect GDEs if the water level trend is being driven by groundwater use. |
| TNC et al. | Climate Change | None | The GSP does incorporate climate change into the projected water budget using DWR change factors for 2030 and 2070. However, the GSP does not consider multiple climate scenarios (e.g., the 2070 extremely wet and extremely dry climate scenarios) in the projected water budget. The GSP should clearly and transparently incorporate the extremely wet and dry scenarios provided by DWR into projected water budgets or select more appropriate extreme scenarios for their basins. While these extreme scenarios may have a lower likelihood of occurring, their consequences could be significant, therefore they should be included in groundwater planning.<br>We acknowledge the inclusion of climate change into key inputs (e.g., precipitation and evaporation) of the projected water budget. However, climate change | Integrate climate change, including extremely wet and dry scenarios, into all elements of the projected water budget to form the basis for development of sustainable management criteria and projects and management actions.<br>Incorporate surface water flow inputs that are adjusted for climate change to the projected water budget.<br>Incorporate climate change scenarios into projects and management actions. | Central tendency climate change factors provided by DWR were used for the projected future water budgets in accordance with DWR guidance. The SCVGSA may choose to evaluate more extreme climate conditions in the future. It is anticipated that the effects of climate change and extended drought will be described in each annual report and evaluated as part of the GSP update process every five years. The GSA will use this information to determine whether additional management actions are warranted if undesirable results are observed. The management actions and potential projects are intended to respond to undesirable results caused by groundwater use. If climate change causes groundwater use to cause undesirable results, the GSA may choose one of many projects and management actions described in the GSP to address the issue. |

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| | | | was not incorporated into surface water flow inputs. The sustainable yield is calculated based on the projected pumping with climate change incorporated. However, if the water budgets are incomplete, including the omission of extremely wet and dry scenarios and projected climate change effects on surface water flow volumes, then there is increased uncertainty in virtually every subsequent calculation used to plan for projects, derive measurable objectives, and set minimum thresholds. Plans that do not adequately include climate change projections may underestimate future impacts on vulnerable beneficial users of groundwater such as ecosystems, DACs, and domestic well owners. | | |
| TNC et al. | Data Gaps | None | The consideration of beneficial users when establishing monitoring networks is insufficient, due to lack of specific plans to increase the Representative Monitoring Sites (RMSs) in the monitoring network that represent water quality conditions and shallow groundwater elevations near DACs and domestic wells in the subbasin. Figure 7-10 (Representative Monitoring Well Network for the Alluvial Aquifer) shows that no monitoring wells are located across portions of the subbasin near DACs and domestic wells (see maps provided in Attachment E). The representative monitoring network fails to represent groundwater conditions for DACs in the subbasin near the town of Newhall. Beneficial users of groundwater may remain unprotected by the GSP without adequate monitoring and identification of data gaps in the shallow aquifer. The Plan therefore fails to meet SGMA's requirements for the monitoring network. | Provide maps that overlay current and proposed monitoring well locations with the locations of DACs and domestic wells to clearly identify potentially impacted areas. Increase the number of RMSs in the shallow aquifer across the subbasin as needed to adequately monitor all groundwater condition indicators. Prioritize proximity to DACs and drinking water users when identifying new RMSs. | The GSP includes implementation actions to expand the monitoring network to include domestic wells. As described elsewhere in this response to comments, significant work identifying DACs utilizing private wells has been conducted, and two non-state mapped DACs have been identified as needing an alternative water supply. A GSA member agency, SCV Water is working with the State and communities to bring in an alternate supply. The GSP has completed significant work in identifying DACs reliant on groundwater. During GSP implementation, outreach to DAC areas will be made again to determine if domestic wells are utilized, if so the GSA will seek volunteers to assist in the domestic well monitoring program in GSP implementation. |
| TNC et al. | Addressing Beneficial Users in Projects and Management Actions | None | The consideration of beneficial users when developing projects and management actions is insufficient, due to the failure to completely identify benefits or impacts of identified projects and management actions, including water quality impacts, to key beneficial users of groundwater such as GDEs, aquatic habitats, surface water users, DACs, and drinking water users. Therefore, potential project and management actions may not protect these beneficial users. Groundwater sustainability under SGMA is defined not just by sustainable yield, but by the avoidance of undesirable results for all beneficial users. | For DACs and domestic well owners, include a drinking water well impact mitigation program to proactively monitor and protect drinking water wells through GSP implementation. Refer to Attachment B for specific recommendations on how to implement a drinking water well mitigation program.<br>For DACs and domestic well owners, include a discussion of whether potential impacts to water quality from projects and management actions could occur and how the GSA plans to mitigate such impacts.<br>The GSP discusses managed aquifer recharge projects. Note that recharge ponds, reservoirs, and facilities for managed aquifer recharge can be designed as multiple-benefit projects to include elements that act functionally as wetlands and provide a benefit for wildlife and aquatic species. For guidance on how to integrate multi-benefit recharge projects into your GSP, refer to the "Multi-Benefit Recharge Project Methodology Guidance Document".<br>Develop management actions that incorporate climate and water delivery uncertainties to address future water demand and prevent future undesirable results. | The GSP describes a program to enroll private well operators in a program to collect water analyses from their wells at GSA expense. This will include specific outreach to known DACs utilizing private wells. As stated in the GSP, if private well monitoring data indicates MCL exceedance for contaminants is observed, the GSA will work with well operators and others to evaluate the cause. Further, the GSA will coordinate with State Regulatory Agencies as needed to understand the issue, and the GSA would also work with affected well owners to look at options for alternate water supplies. For these reasons, we believe that a drinking water well impact mitigation program is unnecessary. The GSP management actions already include climate change effects. In addition, any recharge project implemented in the future will consider multiple benefits. |

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| TNC et al. | Consideration of Beneficial Uses and Users in GSP Development | None | Consideration of beneficial uses and users in GSP development is contingent upon adequate identification and engagement of the appropriate stakeholders. The (A) identification, (B) engagement, and (C) consideration of disadvantaged communities, drinking water users, tribes, groundwater dependent ecosystems, streams, wetlands, and freshwater species are essential for ensuring the GSP integrates existing state policies on the Human Right to Water and the Public Trust Doctrine. | The Human Right to Water Scorecard was developed by Community Water Center, Leadership Counsel for Justice and Accountability and Self Help Enterprises to aid Groundwater Sustainability Agencies (GSAs) in prioritizing drinking water needs in SGMA. The scorecard identifies elements that must exist in GSPs to adequately protect the Human Right to Drinking water. | Section 350.4 of the Regulations cites the human right to water as a general principle to consider in a GSP. The GSA interprets the human right to water as encompassing drinking water needs, especially for disadvantaged communities, and environmental beneficial uses and users. As discussed elsewhere in this response, the GSA has identified and engaged Disadvantaged Communities. These communities are largely served by municipal supply and not domestic wells. And as stated in the preceding response, the GSP provides for water quality monitoring for domestic wells, which may lead to evaluations and management actions in the future. Finally, the GSP provides for protection of environmental uses and users by establishing Sustainable Management Criteria for depletion of surface water and Groundwater-Dependent Ecosystems. |

## CDFW Comment Letter

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| CDFW | Monitoring Plan | Monitoring networks | SGMA regulations require monitoring networks to be developed to promote the collection of data sets with enough quality, frequency, and spatial distribution to characterize groundwater and related surface water conditions in the groundwater basin and to evaluate changing conditions that occur through implementation of the GSP (23 CCR § 354.34(b)). The Department is concerned that 1) the GSA may continue to use monitoring wells that do not provide meaningful data, and 2) the GSA may not replace monitoring wells that are abandoned because that well may not provide meaningful data (among other possible reasons). Relying on wells that do not provide meaningful data could result in an ineffective monitoring network. Also, not replacing wells that are decommissioned could result in the incremental loss of monitoring wells over time, reduction in density of monitoring sites, and loss of representative monitoring stations across the Basin to capture a range of GDE and ISW characteristics. In both instances, this could undermine the GSA's monitoring network. Specifically, this may affect GSA's ability to assess the effects of GSP implementation on GDEs and ISWs and avoid significant and unreasonable undesirable results on GDEs and ISWs resulting from groundwater extraction. | The Department recommends the GSA maintain a sufficient minimum number and density of monitoring wells that will inform evaluation of groundwater management impacts over time. This would provide effective monitoring of sustainability indicators related to groundwater extraction. The GSP should provide a minimum number and density of representative monitoring wells within the Basin, each Study Reach, and GDE area. The GSP should provide adequate scientific rationale for the chosen number and density of monitoring wells. Monitoring wells should be provided at a sufficient density required to demonstrate short-term, seasonal, and long-term trends on a scale meaningful to fish and wildlife and groundwater dependent habitats. The Department recommends the GSA replace wells that do not provide meaningful data and in general, any wells that may be decommissioned, in order maintain an effective monitoring network. The GSP should provide information, general guidelines, and standards as to how the GSA would decide that a well should be abandoned or decommissioned (e.g., a well that does not provide meaningful data). The GSP should also identify when and how the GSA proposes to replace those wells to maintain the minimum number and density of representative monitoring wells within the Basin, each Study Reach, and GDE area. | Section 7.3 discusses the monitoring program requirements and adequacy of the monitoring program including distribution of monitoring wells and recommendations for improving the monitoring program. This monitoring program review will be conducted on an ongoing basis. If it is determined that any monitoring well included in the program is not providing meaningful data, replacement wells will be identified and included in the program. Special GDE monitoring wells are being installed in each reach of the identified GDE area. |

## Public Comments on SCV Public Draft GSP and Responses (November 16, 2021)

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| CDFW | Monitoring Plan | Monitoring networks | According to Table 8.6 on page 8-45, monitoring wells NLF-W5, GDE-A, and NLF-E may not be within a GDE area. The Department is concerned that installing monitoring wells where wells may not be within a GDE area could be ineffective for the GSA to assess the effects of GSP implementation on GDEs and ISWs over time. Furthermore, locating wells outside of GDEs could be ineffective for the GSA to adequately avoid significant and unreasonable undesirable results on GDEs and ISWs resulting from groundwater extraction. | The Department recommends the GSA install monitoring wells at locations that would be effective to assess the effects of GSP implementation on GDEs and ISWs. Also, the GSP should propose alternative locations for wells NLF-W5, GDE-A, and NLF-E given that these three wells may not be within a GDE area. | Special GDE monitoring wells are being installed in each reach of the identified GDE area. All of the proposed and existing GDE monitoring wells are within or very close to the GDE area as shown in Figure 7-14. |
| CDFW | Sustainable Management Criteria | Groundwater Dependent Ecosystems | Section 8.11.1 describes conditions that could lead to undesirable results with respect to GDEs and ISWs. In the February 2021 draft Technical Memo for Sustainable Management Criteria (Memo), the Memo states that the following condition may lead to an undesirable result: "reduction in the quantity of treated wastewater being discharged to the river that reduces river flow and recharge to the Alluvial Aquifer and Saugus Formation." Causes of groundwater conditions that could lead to undesirable results should be described in a GSP (23 CCR § 354.26(b)(1)). A reduction in wastewater discharge from the Saugus and Valencia wastewater reclamation plants (WRPs) was not included in the GSP under Section 8.11.1 as a condition that could lead to undesirable results. A reduction in wastewater discharge could lead to undesirable results on groundwater conditions and GDEs considering that wastewater discharge contributes to the groundwater recharge of the Alluvial Aquifer and supports riparian vegetation1. A reduction in discharge from those WRPs combined with groundwater pumping could result in significant impacts and unreasonable undesirable results on GDEs. | The Department recommends that Section 8.11.1 of the GSP indicate that undesirable results may occur from a reduction in wastewater discharge. Identifying this future project will help the GSA to identify adaptive management actions to avoid undesirable results. If the GSP omits this future project as a potential cause to a condition that could lead to undesirable results, the Department recommends the GSP provide a rationale for why the GSA has decided to omit wastewater discharge from WRPs as a condition that could lead to undesirable results. | We agree that a reduction of the quantity of treated wastewater being discharged to the river could reduce river flow and recharge to the alluvial aquifer and Saugus Formation. Any significant reduction could potentially result in undesirable results. Section 8.11 will be revised accordingly.<br><br>The GSA has no authority over WRP discharges and is not responsible for effects caused by WRP discharge reductions. However, if WRP reductions reduce groundwater levels in areas that support GDEs, the GSP's groundwater monitoring network would detect the change relative to trigger levels established at GDE monitoring wells so that the GSA can determine if this change results in undesirable results. If groundwater levels drop to historic lows influenced by groundwater pumping, the GSP would evaluate the effects and impose management actions needed to sustain GDEs. |
| CDFW | Projects and Management Actions | Groundwater Dependent Ecosystems | Section 9.5.5 describes evaluation and reporting processes to determine whether lowered groundwater levels and surface water depletion are a result of pumping that could result in a significant and unreasonable effect on GDEs. While the Department concurs with the actions described in the evaluation and reporting processes, the Department is concerned that those processes without a reasonable timetable could result in a delayed determination that GDE action triggers have been reached. Moreover, those processes without a reasonable timetable could result in a delayed implementation of management actions to avoid significant and unreasonable undesirable results on GDEs and ISWs. | The Department recommends that the GSA, to the extent feasible, provide a reasonable timetable for initiation and completion for achieving each of the following processes: data and information collection; evaluation report; presentation to GSA Board; and implementation of management actions if GDE action triggers are reached. | We concur that the evaluation and management actions must be timely. This concern will be discussed at the Nov. 23 GSA Board meeting. Modifications to the text that address the timing issue will be made in Section 9.5.5. |

## Public Comments on SCV Public Draft GSP and Responses (November 16, 2021)

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| CDFW | Plan Area | Figure 3-3 | The Department holds over 800 acres of conservation easements within the Santa Clara River Valley East Groundwater Subbasin/Santa Clarita Watershed. These 800 acres are located east of the I-5 bridge. The Department also holds Conservation Easements or other recording instruments west of the I-5 bridge. | The Department recommends the GSA contact the Department to obtain this information to be included into the final GSP. For example, all Department-owned conservation easements and/or recording instruments should be reflected in Figure 3-3 showing federal, State, and county jurisdictions/land ownership in the Basin. | The GSP has established a monitoring program to assess effects of pumping on GDEs, irrespective of ownership or easement overlays. The inclusion of a land ownership map would not alter the responsibilities of the GSA in areas that support GDEs; however, we do not object to showing CDFW conservation easement will be shown on Figure 3-3. |
| CDFW | Executive Summary | Figure ES-2 | The Executive Summary includes Figure ES-2 Distribution and Types of GDEs Mapped in the Basin on page ES-7. The Department recommends this figure be clarified in two aspects. First, upon review of the Executive Summary only, the text boxes on the figure might obscure potential GDEs. Second, it is unclear if the figure is pointing to only two areas of higher elevation that have potential GDEs or if all GDEs in areas of higher elevation are potential GDEs. | The Department recommends moving the text boxes outside of the Basin boundary. In addition, the Department recommends clarifying which areas of higher elevation are potential GDEs or if all areas of higher elevation are potential GDEs. These suggested changes should be made throughout the document where appropriate. | We concur and will adjust the text boxes. |
| CDFW | Projects and Management Actions | Groundwater Dependent Ecosystems | Section 9.5.1.1 Installation of Piezometers within the GDE Area on page 9-4 states, "As described in Section 7, GDE monitoring sites are needed within the GDE area (see Figure 8-2 in Section 8) to allow the GSA to monitor groundwater levels and assess whether groundwater pumping has or will cause impacts to GDEs related to lowered groundwater levels and depleted surface water. Eight GDE monitoring sites have been tentatively identified." Figure 8-2 shows historical summer monthly streamflow volume at stream gages instead of a figure that should show GDE monitoring sites. | The Department recommends checking whether the statement should refer to Figure 8-2 and if not, provide the correct figure reference. | This figure reference will be corrected. |
| CDFW | General | None | The GSA may need to revise the GSP before it is finalized and adopted by the GSA. | The Department recommends the GSA provide a red-lined version of the final GSP to understand the changes made between the draft GSP and final GSP. Alternatively, the Department recommends the GSA provide a summary of changes made and comments addressed by the GSA in preparation of a final GSP. | This comment and response log will be made available to the public and submitted with the final GSP. |

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| CDFW | General | Public Trust Doctrine | The Public Trust Doctrine imposes a related but distinct obligation to consider how groundwater management affects public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to surface waters is also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses. (Environmental Law Foundation v. State Water Resources Control Board (2018), 26 Cal. App. 5th 844; National Audubon Society v. Superior Court (1983), 33 Cal. 3d 419.) The GSA has "an affirmative duty to take the public trust into account in the planning and allocation of water resources, and to protect public trust uses whenever feasible." (National Audubon Society, supra, 33 Cal. 3d at 446.) Accordingly, groundwater plans should consider potential impacts to and appropriate protections for ISWs and their tributaries, and ISWs that support fisheries, including the level of groundwater contribution to those waters. | The Basin's riparian habitat supports several special status avian species including the least Bell's vireo (Vireo belli pusillus) and southwestern willow fly catcher (Empidonax traillii extimus). The aquatic habitat also supports several special status fish species including unarmored three-spined stickleback (Gasterosteus aculeatus williamsoni) and Santa Ana sucker (Catostomus santaanae). Pertaining to the protection of these species and their habitat, the Department is providing comments regarding GDE monitoring and implementation of management actions to avoid a significant and unreasonable effect to GDEs and ISWs. | The GSP supports the public trust uses in the Basin by adopting Sustainable Management Criteria for depletion of interconnected surface waters and GDEs. The GSP acknowledges that GDEs may support each of the species identified in the comment. The GSP considers potentially significant and unreasonable effects to these resources resulting from groundwater pumping. As a result, the GSP commits the GSA to implementing a monitoring plan including management actions connected to trigger levels. |

## FSCR Comment Letter

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| FSCR | Sustainable Management Criteria | Chronic lowering of groundwater levels | "The context for the sustainability goal is the recognition that no undesirable effects have occurred in the Basin to date." (Page 8-6)<br>We disagree with this statement. Perhaps it is intended to mean that the wells recovered after a dry period. However, as you are aware, locally and statewide we have not seen recovery of ground water. DWR and others estimate we would need 140% of precipitation to recover lost storage and groundwater. With the extreme reduction in precipitation in the upper basin, wells have not recovered except where they have been shut off due to PFAS or Perchlorate pollution. Pumping at lower levels of the Saugus Aquifer substantially increases hardness and other water quality issues that were not previously monitored (see data gaps in section 9) causing expensive plumbing and other issues to the general public. These affects have already been experienced in previous droughts and now in the current drought. Visually, one can see the drying out and loss of riparian habitat as water levels retreat below the vadose zone in the main stem of the Santa Clara River especially in the upper watershed area. This is a negative, unreasonable and undesirable effect. Degradation of air quality from blowing dust as moisture is eliminated from the soil has and is already occurring at current levels of pumping. | Reset the ground water trigger levels to the 2011 levels as a precaution against future findings and the results from investigations of the substantial data gaps in the current Plan (as indicated throughout Chapter 9). | The extended state-wide drought and expanded groundwater production has resulted in overdraft conditions in a number of basins statewide. This is not the case in this basin. Monitoring conducted over many years and modeling of possible future conditions in the Basin show that undesirable results, including overdraft are unlikely in this basin. Refer to Section 6, Water Budget, for more discussion.<br><br>The GSP establishes trigger levels where they had not existed before with the express intent of protecting GDEs as public trust resources. Identifying trigger levels at 2011 levels is unnecessary to prevent undesirable results, since GDEs would not be adversely affected during wet years. GDEs are most vulnerable during the late summer period of drought years. The GSP would implement management actions such as reduced pumping to prevent acute as well as chronic stress to GDEs during these periods. |

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| FSCR | Sustainable Management Criteria | Groundwater dependent ecosystems | Even ephemeral flows in the eastern area (which your agency excluded from the study area, stating there were no GDEs in this area) and springs have disappeared during extreme pumping periods. We disagree with the failure to include this portion of the river in GDE analysis because several endangered species inhabit this section of the river and it is a major wildlife corridor. The plan also fails to mention tree die off that occurred in upland areas such as the die off of oaks in the Valley Oak Savannah (west of I-5 between McBean Pky and Valencia Blvd. in Stevenson Ranch) | Evaluate the upper water shed of the Santa Clara River, (east of Bouquet Creek) and the River's tributaries as GDEs and include the Valley Oaks Savannah as a GDE. Without these included the minimum thresholds, measurable objectives and undesirable results on beneficial users and uses remain incomplete. | The GSP inventories GDEs throughout the watershed including east of Bouquet Creek and its tributaries. The GSP's minimum thresholds, measurable objectives and consideration of undesirable results all apply to areas supporting GDEs anywhere in the watershed. The eastern portion of the watershed is naturally dry due to geological conditions. Some GDEs exist in the upper canyons that are sustained by shallow groundwater replenished by winter precipitation or perched water that is at higher elevation than the aquifers present in the center of the Basin. These areas are not connected to the Alluvial Aquifer and are not impacted by pumping. The GSP concludes that GDEs in the upper watershed are sustained by soil moisture, seepage from upper formations, and shallow groundwater present during winter months. In the far upper tributary valleys, GDEs survive on groundwater that rapidly decreases with the dry season, replenished by winter rains in a hydrologic cycle that is disconnected from Alluvial aquifer pumping downstream. The GSP correctly inventories the vegetation types in these areas including areas supporting Valley Oaks Savannah. To address comments received during the preparation of the GSP, the monitoring plan includes additional evaluation in some of these upland areas, to verify that groundwater pumping is not affecting these important resources. |
| FSCR | Sustainable Management Criteria | Chronic lowering of groundwater levels | The Basin Operating Plan described in Section 6 contemplates groundwater levels lower than historical levels during dry years, to accommodate future buildout, conjunctive use operating strategies, and climate change (p. 8-4)It appears from this statement that the agency intends to inflict these lower levels and undesirable impacts permanently on the natural and human community to accommodate massive and unsustainable building in the SCV by finding there will be no impact. This supposition seems to be promoted in the following ways:By failure to admit the existence of undesirable impactsBy stating that a drop in water levels occur only due to a drought and are not a result of pumping, a supposition that is not borne out by examining records of agency wells removed from service due to pollution which experienced a marked rise in water levels during the last year despite the lowest recorded rainfall ever.By using only certain wells (Table 5-6) instead of analyzing a wide number of wells throughout the basin as was done by the downstream United Water Conservation DistrictBy excluding areas where undesirable impacts are occurring from the study areaBy setting the base ground water level too low – (using the lowest historical drought level as the base level)By not adequately assessing the Public TrustBy ignoring Climate Change | | Development of the GSP utilized all available data from all wells and did not rely solely on historical reports. Climate change was also evaluated in detail. The GSP does recognize the potential for undesirable effects. However, the GSP concludes that the basin does not now and likely will not in the future experience chronic groundwater declines. Rather, groundwater levels have historically recovered after periods of drought. The GSP outlines a monitoring program to ensure that if groundwater level trends indicate triggers will be reached, or if they are reached, an evaluation of potential effects to GDEs from pumping will be conducted. Future climate variability will be documented with monitoring data. Management actions are identified to protect public trust resources. Implementation of the GSP will improve data collection and assign responsibilities to protect resources. |
| FSCR | Sustainable Management Criteria | Interconnected surface water | The River and ground water basins are a connected system. Setting the groundwater levels at historical lows, thus planning to allow these levels to occur for an extended length of time and to even exceed these levels without triggering a reduction in ground water pumping is not acceptable. We note that | We urge that the base ground water levels be increased by using a more normal year such as the 2011 year that was used by downstream Plans. From a cooperative management point of view between the basins, 2011 levels provide a more coordinated/collaborative basis for Watershed management, and are more | The Trigger levels are set at, or above historic lows as described in the GSP. The comment misrepresents the approach to use Trigger levels. As described in the GSP, evaluations of GDE conditions will begin before, or when GDE triggers are reached to determine if groundwater pumping may create undesirable results. If groundwater pumping may create undesirable results, management actions will be performed in a timely manner to raise groundwater |

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| | | | lower water levels impact surface water and groundwater interactions and could lead to impacts to downstream aquatic species, particularly critical Southern California steelhead habitat and recovery actions established by NMFS in the 2012 Southern California Steelhead Recovery Plan. The Fillmore and Piru Plans used 2011 levels, not the drought year levels as used in the Upper Santa Clara Plan. While these are separate plans, the river remains a connected system on which human and nature rely. | precautionary. This will help ease negotiations and targets across the plans under the cooperative agreements required under SGMA. | elevations. Over time these trigger levels will be evaluated with additional study, including field study, and revised as warranted. Groundwater levels fluctuate seasonally and annually. The GDEs that exist in the watershed are sustained through these fluctuations. The GSP's management actions include reduced pumping if needed to sustain GDEs. The GSP recognizes that groundwater levels are linked to GDEs, and that pumping may affect GDEs. As a result, trigger levels have been established where they had not existed before with the express intent of protecting GDEs as public trust resources. This is a major step forward in managing the basin while considering effects to GDEs. Monitoring groundwater levels with respect to pumping will provide better management of the GDEs. Historic low groundwater levels generally correspond to drought years. Identifying trigger levels at 2011 levels is unnecessary to prevent undesirable results, since GDEs would not be adversely affected during wet years. GDEs are most vulnerable during the late summer period of drought years. The GSP would implement management actions such as reduced pumping to avoid undesirable results to GDEs if needed. |
| FSCR | Sustainable Management Criteria | Interconnected surface water | The Public Trust Doctrine imposes an obligation to consider how groundwater management affects public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to surface waters are also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses. Accordingly, groundwater plans should consider potential impacts to and appropriate protections for interconnected surface waters and their tributaries, and interconnected surface waters that support fisheries, including the level of groundwater contribution to those waters. In the context of SGMA statutes and regulations, and Public Trust Doctrine considerations, groundwater planning should carefully consider and protect environmental beneficial uses and users of groundwater, including fish and wildlife and their habitats, groundwater dependent ecosystems, and interconnected surface waters. Availability of surface flow, riparian vegetation and riparian canopy cover for instream fish and wildlife migration is an important part of ensuring species viability. | The major tributaries of the Santa Clara River, including Castaic Creek, San Francisquito Creek, Placerita Creek, the South Fork and the Upper Watershed main stem of the Santa Clara River (east of Bouquet Creek) should have been included in GDE analysis. | The GSP supports the public trust uses in the Basin by adopting Sustainable Management Criteria for depletion of interconnected surface waters and GDEs. The GSP inventories all GDEs in the watershed including those mentioned, considers effects of pumping, and establishes a monitoring program with Triggers and Management Actions to ensure GDEs are not adversely affected by groundwater pumping. The GSP identifies all GDEs in the watershed irrespective of land ownership, including all GDEs in each of the creeks listed in the comment. |

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| FSCR | Management Actions and Projects | Data gaps | Lack of information about groundwater levels in the GDE area, elevation control of well heads and river bottom, domestic well water quality, and subsidence benchmarks puts into doubt the choice to use the historical low levels as a trigger. | The decision to use historical low levels as a trigger should be re-evaluated and set higher as a precaution to allow for prediction errors. | The GSP monitoring plan will track groundwater level trends at various points along the river corridor, collecting data that will be available to forecast trends and warn of potential historic low levels. In locations approaching historic low groundwater levels, the GSA may evaluate implementing management actions to avoid undesirable effects in a timely manner. The threshold triggers are set at historic lows since undesirable effects would not be anticipated at or above those levels in most areas. The GSP establishes an interim trigger above historic lows in specific areas that are particularly sensitive and known to sustain sensitive aquatic species. These trigger levels provide sufficient time to implement management actions at that location prior to the occurrence of undesirable results. The GSP evaluates the resiliency of each river segment through ongoing monitoring of water levels and using satellite imagery (e.g., EVI) and observations by a biologist. The plan provides triggers suitable to each segment, ultimately ensuring resiliency of the entire GDE network within the watershed. Trigger levels have been established where they had not existed before with the express intent of protecting GDEs as public trust resources. This is a major step forward in managing the basin while considering effects to GDEs. |
| FSCR | Management Actions and Projects | Subsidence | 9.5.4.3 We are wondering how the Agency set minimum levels for subsidence when it admits earlier in the Plan that no monitoring for subsidence had previously been conducted. | | Minimum thresholds have been set based on a) land surface elevation data provided by satellite imagery (e.g., InSAR), b) ground surface elevation monitoring performed by LA County at benchmarks established in the basin, and c) results from a subsidence evaluation performed by LSCE. These data sources will continue to be monitored. In addition, ground surface elevation monitoring will also be conducted by SCV Water at critical infrastructure locations. |
| FSCR | Management Actions and Projects | Data gaps | There are no firm timelines as to when data gaps will be addressed and data will be publicly available. | Provide a timeline as to when data gaps will be addressed. | Work to address data gaps will be initiated upon submittal of the GSP to DWR. Installation of GDE monitoring wells has already been initiated. The status of efforts to address data gaps will be reported annually in the annual report submitted to DWR (and made available to the public). |
| FSCR | Management Actions and Projects | State Water Project water | While most of the list of actions to be taken in the event reduced pumping is required are reasonable, we believe Action #4 should be eliminated or modified. (4. Bring in additional State Water Project water or other imported banked water to make up for reduced groundwater supply.) It is unlikely that excess state water would be available in a statewide drought as has occurred this year, is predicted for next year and may continue to occur in the future. Further, the SCV water Agency UWMP has stated that it would reduce the use of SWP water in the future. | This action should be modified to state that water from the Agency's banked storage would be used, to the extent available. | No response needed |
| FSCR | Management Actions and Projects | Funding | There is no discussion as to how implementation of the plan will be funded. | | Section 10 of the GSP includes a discussion of funding options. |
| FSCR | Public Notice and Communications | Disadvantaged communities | We do not see any indication of inclusion of disadvantaged communities in the Plan process as required by SGMA. Posting information on the Agency website is helpful, but Plan commenters should also be informed by email when updates or additional information is posted. | Focused mailings should be done in DAC's in promote better engagement and support involvement. Improve outreach to DAC's to ensure human right to water considerations, as well as safe and affordable drinking water. | As outlined in the Community Engagement Plan, the Department of Water Resources Disadvantaged Community Mapping Tool was used to search for Disadvantaged Communities (DACs) in the basin, and it identified certain areas in the basin as meeting the definition of a DAC.<br>Efforts are under way via the Proposition 1 Disadvantaged Community Involvement Program, locally led by the Upper Santa Clara River Integrated Regional Water Management Planning (USCR IRWM) group, to reach out to DACs in the basin. Though the outreach is not specific to the SCV-GSA, member |

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| | | | | | agencies of the SCV-GSA are members of the USCR IRWM and use its stakeholder meetings to provide updates on the GSP development. The USCR IRWM also attends meetings of the Lower Santa Clara River IRWM (in Ventura County), and provides updates to its stakeholders on GSP development too.<br>For all workshops and outreach throughout the development of the GSA, information was provided by email, distributed via social media, covered by the local paper and advertised locally. Additionally, for the process of final review and adoption of the Draft GSP, printed information was delivered to businesses and communities located within the identified DACs.<br>The CEP will be revised to include outreach for the plan implementation phase, and will further describe these efforts. |
| FSCR | General | None | Climate change considerations remain lacking, especially in light of mega drought trends, and future conditions and allocation from both the Colorado River and Delta. | | Central tendency climate change factors provided by DWR were used for the projected future water budgets in accordance with DWR guidance. The SCVGSA may choose to evaluate more extreme climate conditions in the future. It is anticipated that the effects of climate change and extended drought will be described in each annual report and evaluated as part of the GSP update process every five years. The GSA will use this information to determine if Sustainable Management Criteria, management actions or projects need revision. |

## SCOPE Comment Letter

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| SCOPE | Projects and Management Actions | Data gaps | First, the Plan describe many “data gaps” throughout the document and particularly in Chapter 9. Yet the Plan sets the ground water trigger level to begin action at the lowest historic drought ground water level and the Plan gears the GDE level at only two feet above the historic low. The justification for this low trigger level appears to be that there have been no undesirable impacts to date, a statement with which we disagree (discussion to follow below). This leads us to wonder if the Agency’s failure to see impacts might be influenced by SCV Water Agency (who controls the GSP planning through a majority of Board members on the GSA Board and financing), in an effort to continue or augment its current pumping regime. | We recommend that the trigger level be set higher, preferably at the 2011 level, which was a more normal year. This would also allow better coordination with downstream users and be more protective of small pumpers and of GDEs. | The GSP recognizes that groundwater levels are linked to GDEs, and that pumping may affect GDEs. GDEs in the basin have adapted to the range of surface water and groundwater levels in the basin that have historically occurred as a result of climate and pumping effects. As a result, trigger levels have been established at historical low water levels that GDEs have experienced in the past. Triggers were established as a criterion where they had not existed before with the express intent of protecting GDEs as public trust resources. This is a major step forward in managing the basin while considering effects to GDEs. Monitoring groundwater levels with respect to pumping will provide better management of the GDEs. Historic low groundwater levels generally correspond to drought years. Identifying trigger levels at 2011 levels is unnecessary to prevent undesirable results, since GDEs would not be adversely affected during wet years. GDEs are most vulnerable during the late summer period of drought years. The GSP would implement management actions such as reduced pumping to avoid undesirable results to GDEs during these periods. |
| SCOPE | Projects and Management Actions | Subsidence | Using the historic low as a baseline seems imprudent, especially after admitting a lack of data in areas from subsidence, to water quality, and ground water levels in GDE areas. The Plan includes statements such as this one regarding subsidence: 9.5.4.3 Subsidence "While significant and unreasonable subsidence caused from the whole of these activities has not been observed, groundwater pumping may temporarily cause groundwater level declines of up to 150 feet in the future. It is believed [? the Plan admits there has been no | Reset the ground water trigger levels to the 2011 levels as a precaution against future findings and the results from investigations of the substantial data gaps in the current Plan (as indicated throughout Chapter 9). | The GSP relies on best available science and includes discussions of uncertainty and how data gaps will be addressed over time to reduce uncertainty. The monitoring plan is intended to provide a basis for evaluating whether undesirable results are likely. The monitoring plan will be improved over time. Management actions are listed that may be implemented if it is determined that pumping is causing undesirable results. Identifying GDE trigger levels at 2011 levels is unnecessary to prevent undesirable results, particularly since that was a wet year. |

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| | | | investigation. What is the basis for this belief?] the geologic framework in this Basin has limited susceptibility to subsidence resulting from groundwater extraction, but there are data gaps." | | |
| SCOPE | Sustainable Management Criteria | Data gaps | Data gaps may also have been caused by the consultant's decision to use only specific wells rather than compiling data from all or a majority of wells as was done in the downstream United Conservation District Plan. No private well owner information was collected or included in the Plan, even though these wells and the people dependant on them, (who are often located in the upper reaches of tributaries), may be the most affected by a drop in the ground water levels. This is a data gap not discussed in the Plan. | | Development of the GSP utilized all available data from all wells and did not rely solely on historical reports. Private landowner data was included in the study and they are part of the monitoring program. A lack of private well data in some of the tributaries was identified as a data gap and a management action has been established in the implementation plan to obtain water level and water quality data from well owners who wish to participate in the program. |
| SCOPE | Projects and Management Actions | Data gaps | There is no stated or apparent timeline for completion of research to fill these data gaps even though they are essential for evaluating ground water level triggers that would avoid undesirable outcomes. It appears therefore that the agency intends to wait, possibly as long as the five-year update. This is not acceptable. GDEs may be irreparably harmed, especially aquatic species in those areas, by a delay in information. | Provide a timeline as to when data gaps will be addressed. In light of the delay in obtaining research data, we recommend that the ground water level trigger be set at the 2011 water level as a precaution until data for all areas is obtained. | Work to address data gaps will be initiated upon submittal of the GSP to DWR. Installation of GDE monitoring wells has already been initiated. The status of efforts to address data gaps will be reported annually in the annual report submitted to DWR (and made available to the public).<br>We concur that the evaluation and management actions must be timely. This concern will be discussed at the Nov. 23 GSA Board meeting. Modifications to the text that address the timing issue will be made in Section 9.5.5. |
| SCOPE | Undesirable Outcomes | Sustainability goal | The Plan seeks to legitimize is use of the historic drought level low as its baseline with the statement: "The context for the sustainability goal is the recognition that no undesirable effects have occurred in the Basin to date." (Page 8-6) While according to the well data used in the Plan, wells have recovered after a drought, other indicators of undesirable impacts have been substantial. Further, locally and statewide we have not seen recovery of ground water levels. DWR and others estimate we would need 140% of precipitation to recover lost storage and ground water. We disagree with the above statement and assert that there are many undesirable impacts which the Agency has failed to acknowledge. These undesirable impacts include:Pumping at lower levels of the Saugus Aquifer substantially increases hardness and other water quality parameters that were not previously monitored (see data gaps in section 9). This causes expensive plumbing problems and other issues for the general public. These affects have already been experienced in previous droughts and now in the current drought.The drying out and loss of riparian habitat as water levels retreat below the vadose zone in the main stem of the Santa Clara River especially in the upper watershed just west and | Evaluate the upper water shed of the Santa Clara River, (east of Bouquet Creek) and the River's tributaries as GDEs and include the Valley Oaks Savannah as a GDE. Without these included the minimum thresholds, measurable objectives and undesirable results on beneficial users and uses remain incomplete. | The GSP does consider all of the tributaries and habitats when identifying GDEs and potential undesirable results. The GSP provides a robust assessment of resources and potential effects. The upper watershed creeks and canyons are included in this assessment. The GSP concludes that GDEs in the upper watershed are sustained by soil moisture, seepage from upper formations, and shallow groundwater present during winter months. In the far upper tributary valleys, GDEs survive on groundwater that rapidly decreases with the dry season, replenished by winter rains in a hydrologic cycle that is disconnected from Alluvial aquifer pumping downstream. The GSP correctly inventories the vegetation types in these areas including areas supporting Valley Oaks Savannah. To address comments received during the preparation of the GSP, the monitoring plan includes some of these upland areas, to verify that groundwater pumping is not affecting these important resources. |

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
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| | | | further east of Bouquet bridge. This is a negative, unreasonable, and undesirable effect.Vegetation die-off in the eastern portion of the study area east of Bouquet Creek, loss of year-round instream flow in San Francisquito Creek and various previously year round springsDegradation of air quality from blowing dust as moisture is eliminated from the soil is already occurring at current levels of pumping.Tree die off that occurred in upland areas such as the die off of oaks in the Valley Oak Savannah (west of I-5 between McBean Pky and Valencia Blvd. in Stevenson Ranch) | | |
| SCOPE | Sustainable Management Criteria | Chronic lowering of groundwater levels | While the Plan erroneously claims that no undesirable impacts have occurred (please see our objections above), and admits substantial data gaps as previously stated, it contemplates even lower future water levels in its efforts to accommodate massive and unsustainable building in the SCV by finding there will be no impact. In addition to claiming there were no impacts from pumping at these levels, the Plan implies that water level drops were caused by drought (a data gap to be addressed in the future), not their own pumping. This theory is not borne out by their own well records where agency wells removed from service in 2020 due to PFAS pollution experienced a marked rise in water levels even during this last year that saw the lowest rainfall on record in the SCV. Since ground water extraction is already lowering water levels and causing undesirable effects, further lowering it to create hardened demand (housing) and not addressing a reduction in pumping to account for Climate Change will not resolve the issues, but only make them worse. The substantial pumping modeled for the existing Basin Plan Yield (table on page 6-29) cannot be supported when undesirable impacts are already occurring at present with a much-reduced pumping regime. | The actions to address this unsustainable pumping as described in Chapter 9 should be implemented immediately. | A comprehensive evaluation was performed using the updated calibrated groundwater model to assess changes in groundwater conditions and conditions in the GDE areas resulting from future land use changes and increases in pumping demand at full build out in accordance with the operating plan described in the 2021 UWMP. Climate change was also considered. This work and the results are presented in detail in Section 6, Water Budget. The validity of the groundwater model for evaluating groundwater and surface water conditions in the Basin and sustainability of the resource was reviewed by an independent peer review panel of experts. That report is presented in Appendix H.<br><br>Definitions for what is considered an undesirable result and whether they have been observed has been discussed in several stakeholder advisory committee meetings and GSA Board meetings. While not everyone is expected to agree, the GSP reflects the scientific data and observations made in the basin and the opinions of the vast majority of the Basin stakeholders who provided input on these matters. |
| SCOPE | General | Public trust | We concur with and restate the position of the Friends of the Santa Clara River that the Public Trust Doctrine imposes an obligation to consider how groundwater management affects public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to surface waters are also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses. Availability of surface flow, riparian vegetation and riparian canopy cover for instream fish and wildlife migration is an important part of ensuring species viability. | Accordingly, groundwater plans should consider potential impacts to and appropriate protections for interconnected surface waters and their tributaries, and interconnected surface waters that support fisheries, including the level of groundwater contribution to those waters. In the context of SGMA statutes and regulations, and Public Trust Doctrine considerations, groundwater planning should carefully consider and protect environmental beneficial uses and users of groundwater, including fish and wildlife and their habitats, groundwater dependent ecosystems, and interconnected surface waters. The major tributaries of the Santa Clara River, including Castaic Creek, San Francisquito Creek, Placerita Creek, the South Fork and the Upper Watershed main stem of the SantaClara River (east of Bouquet Creek) should have been included in GDE analysis. | Please see responses to this comment made by FSCR. The GSP inventories all GDEs in the watershed including those mentioned, considers effects of pumping, and establishes a monitoring program with Action Triggers and Management Actions to ensure GDEs are not adversely affected by groundwater pumping. The GSP identifies all GDEs in the watershed irrespective of land ownership, including all GDEs in each of the creeks listed in the comment. This is consistent with DWR requirements and the Public Trust Doctrine.<br><br>The GSP does recognize the potential for undesirable effects. However, the GSP concludes that the basin does not now and likely will not in the future experience chronic groundwater declines. Rather, groundwater levels have historically recovered after periods of drought. The GSP outlines a monitoring program to ensure groundwater levels do not drop below historic levels in the GDE areas. Future climate variability will be documented with monitoring data. Management actions are identified to protect public trust resources. Implementation of the GSP will improve data collection and assign responsibilities to protect resources. |

# Public Comments on SCV Public Draft GSP and Responses (November 16, 2021)

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
|---|---|---|---|---|---|
| SCOPE | Public outreach | Disadvantaged communities | Disadvantaged communities don't seem to be included in the outreach process as required by SIGMA. | We appreciate the Agency's efforts to provide some Spanish language materials but believe feedback on the Plan would be more complete with more inclusion of this group. Improve outreach to DAC's to ensure human right to water considerations, as well as safe and affordable drinking water. | As outlined in the Community Engagement Plan, the Department of Water Resources Disadvantaged Community Mapping Tool was used to search for Disadvantaged Communities (DACs) in the basin, and it identified certain areas in the basin as meeting the definition of a DAC.<br>Efforts are under way via the Proposition 1 Disadvantaged Community Involvement Program, locally led by the Upper Santa Clara River Integrated Regional Water Management Planning (USCR IRWM) group, to reach out to DACs in the basin. Though the outreach is not specific to the SCV-GSA, member agencies of the SCV-GSA are members of the USCR IRWM and use its stakeholder meetings to provide updates on the GSP development. The USCR IRWM also attends meetings of the Lower Santa Clara River IRWM (in Ventura County), and provides updates to its stakeholders on GSP development too.<br>For all workshops and outreach throughout the development of the GSA, information was provided by email, distributed via social media, covered by the local paper and advertised locally. Additionally, for the process of final review and adoption of the Draft GSP, printed information was delivered to businesses and communities located within the identified DACs.<br>The CEP will be revised to include outreach for the plan implementation phase, and will further describe these efforts. |
| SCOPE | General | None | Climate change considerations remain lacking, especially in light of mega drought trends, and future conditions and allocation from both the Colorado River and Delta. | | Please see previous response to the same comment from FSCR. |

# Public Comments on SCV Public Draft GSP and Responses (November 16, 2021)

## Comments on the Public Draft GSP Submitted via the Comment Portal

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
|---|---|---|---|---|---|
| Roger A. Haring, Citizen of Santa Clarita Valley | Management Actions and Projects | p. 9-4 | In regards to "9.5.1.3 Domestic Well Water Quality" type projects to ensure protection of the water quality for Domestic/Private Well Water:<br>This is a critical project for all private (domestic) well owners in the East Sub-Basin Aquifer region of the Santa Clarita Valley. It should be a priority for all private well owners to ensure that "their water quality" is not altered, influenced. or degraded by local ground water management protocols (i.e. Water Banking, Over-Draft Pumping, Extended Drought Conditions, and/or Anthropomorphic Damages to Surface Waters, etc.). This is especially important for those private well owners that are on the main tributaries to the upper Santa Clara River Valley.<br>Over the recent decades, many of the private / domestic well water qualtiy in the East Sub-Basin Aquifer region have been "significantly changed" due to numerous factors (i.e. "restoration efforts" in upper watershed post wildfire events, "prolong drought conditions," "anthropomorphic damages to surface waters," etc.) There must be PROACTIVE INTERVENTIONS taken to arrest, restore, and enhance the domestic well water quality issues, which has been allowed to degrade over time. Without proper management, implemented protocols, or higher standards for "water quality" in the upper watershed private / domestic wells, the continued degradation of the East Sub-Basin Aquifer water quality will continue to erode. | | We concur that protecting private domestic well owners is a priority. The GSP has taken into consideration domestic wells in its analysis but acknowledges that data are lacking for domestic wells, particularly in tributary areas. To address this data gap, Section 9 of the GSP includes a plan to obtain water level and water quality data from domestic well owners that wish to participate in the program.<br><br>The GSA will respond to water quality issues that are identified by considering if they are a result of groundwater use, GSA actions, or other factors. The GSA has committed to work with landowners affected by contamination and will coordinate with state regulatory agencies (e.g., regional water quality control board and DTSC) who have authority over these matters. |
| Tom Dudley, University of California, Santa Barbara | Management Actions and Projects | 9.6.2 | I strongly support the goal of removing invasive species, like Arundo and tamarisk, which use excessive water resources, offer poor habitat to protected species, and frequently promote wildfire ignitions and expansion. SCVWA has recently entered into a contract with the "Restoration Science Team" to develop plans for watershed-wide Arundo removal, and it would be critical to integrate invasive species management and riparian restoration into that newly established program. | | We concur and have included support for removal of invasive species as a project and management action described in Section 9 of the GSP. |

# Public Comments on SCV Public Draft GSP and Responses (November 16, 2021)

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
|---|---|---|---|---|---|
| Stacy Fortner, Member, SCV-GSA Stakeholder Advisory Committee | Groundwater Levels | GDEs | I am a current member of SCV-GSA Stakeholders Advisory Committee and I have been very vocal that I believe the groundwater levels are set too low at the historic low levels. In the past these areas have seen GDE impacts during drought years also due to over pumping. The plan also fails to mention tree die off that occurred areas such as the oaks in the Valley Oak Savannah (west of I-5 between McBean Pky and Valencia Blvd)<br>I feel like my concerns to adjust the groundwater levels were ignored and leaves me with the impression that there is no intention of mitigating the negative and undesirable impacts, and the agency intends to continue the support suburban sprawl.<br>I have voiced concerns during SAC meetings that areas where the most undesirable impacts are observed are completely excluded from the study.<br>I have mentioned in several meetings that I have doubts that drought has been the reason our well levels have dropped. I firmly believe the ground water in our aquifer is being over pumped. I spoke up at a SAC meeting in order to show that while we are currently in a drought, our well levels are at a healthy level as reported in the SCV Water Agency Engineering Committee handouts. We currently have several wells closed due to contamination, and no pumping is occurring in those wells – the well levels are up. Once the pumping begins, those wells levels will drop, so it makes sense that drought is NOT the reason those well levels dropping. | I would like to see the ground water trigger levels to the 2011 levels. Setting at historic lows is reckless and dangerous to the surrounding GDEs<br>I would like to include the East portion of the upper water shed of the Santa Clara River, and the River's tributaries as GDEs<br>Also include the Valley Oaks Savannah as a GDE. These need to be included in the minimum thresholds, measurable objectives and undesirable results. | This is a valid concern and was discussed several times at Stakeholder Advisory Committee (SAC) meetings. The GDE areas are supported by a combination of surface water, including WRP releases, and groundwater. Groundwater levels fluctuate significantly in many locations in the GDE area seasonally and from year to year due to changing rainfall, WRP discharges, and pumping. The existing habitat has adapted to these fluctuations and remains vigorous, even after the peak of the 2012-2017 drought. While some stress and limited die off occurred during that period, the vegetation has regrown. An enhanced vegetation analysis (EVI) was recently conducted that confirms this conclusion. For these reasons, the decision was made to utilize the historical water level low as the basis for setting GDE triggers. The SAV also voted to accept this approach. Monitoring of groundwater levels, river flow, and GDE health is included in the monitoring plan. If groundwater levels approach the GDE trigger levels that have been established, an evaluation will be performed and management actions taken if undesirable results and impacts to GDEs are likely to occur from groundwater pumping.<br><br>Identifying trigger levels at 2011 levels is unnecessary to prevent undesirable results, since GDEs would not be adversely affected during wet years. GDEs are most vulnerable during the late summer period of drought years. The GSP would implement management actions such as reduced pumping to prevent acute as well as chronic stress to GDEs during these periods.<br><br>The GSP correctly inventories the vegetation types in the eastern portion of the watershed including areas supporting Valley Oaks Savannah. To address comments received during the preparation of the GSP, the monitoring plan includes some of these upland areas, to verify that groundwater pumping is not affecting these important resources. |
| Stacy Fortner, Member, SCV-GSA Stakeholder Advisory Committee | Public Trust | | In 2018 the California Court of Appeal held that the public trust doctrine must be also be considered, and public trust resources protected—in any decision governing withdrawals of groundwater that is hydrologically connected to public trust surface waters. Public Trust has not been considered in any meaningful way. | | We concur that the public trust doctrine is important and should be considered in the GSP. We believe that we have adequately met the requirements of this doctrine as presented in the GSP and discussed in responses to similar comments. In particular, the setting of Sustainable Management Criteria for interconnected surface waters and GDEs protects public trust uses. |
| Stacy Fortner, Member, SCV-GSA Stakeholder Advisory Committee | Climate Change | | I also feel that climate change is not adequately addressed in this plan. Climate change section is weak considering new info released in latest PPIC reports. | | See previous responses. |
| Stacy Fortner, Member, SCV-GSA Stakeholder Advisory Committee | Data Gaps | | Data Gaps need to be addressed | | See previous responses regarding data gaps. |

## Public Comments on SCV Public Draft GSP and Responses (November 16, 2021)

| Commenter | Category | Subcategory | Issue Identified | Recommendation | Response |
|---|---|---|---|---|---|
| Stacy Fortner, Member, SCV-GSA Stakeholder Advisory Committee | Public Engagement | | Public Comments from various Public Workshops are difficult to find. Needs to be more accessible. The form provided to submit comment online is ridiculously cumbersome for the general public. I mean could you have made any more confusing and complicated for anyone outside the agency. | | We are sorry that you experienced this frustration. We will work to continually improve the feedback process because we believe it is very important. |

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**ITEM NO. 4.3**

# Santa Clarita Valley Groundwater Sustainability Agency Board Memorandum

**DATE:** November 23, 2021

**TO:** SCV-GSA Board of Directors

**FROM:** SCV-GSA Staff

**SUBJECT:** Designation of SCV-GSA Board Voting Delegate for Association of California Water Agency (ACWA) Election for the 2022-2023 Term

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## SUMMARY/DISCUSSION:

There will be a General Session Membership meeting at the 2021 ACWA Fall Conference. The purpose of this meeting is to formally nominate and elect ACWA's President and Vice President for the 2022-2023 term.

The ACWA Nominating Committee, headed by Chair Brent Hastey, has announced a slate that recommends current ACWA Vice President Pamela Tobin for ACWA President and current ACWA Region 10 Vice Chair Cathy Green for ACWA Vice President.

Member agencies must indicate their voting representative and alternate on the Voter Designation & Information Form. The form must be submitted by Wednesday, November 24. Voters must be present at the membership meeting, either in person or virtually, to vote.

## FINANCIAL CONSIDERATIONS:

None at this time.

## RECOMMENDATION:

That the Board of Directors appoint Director Martin as the Voting Delegate and Director Cooper as the Alternate Voting Delegate for the Santa Clarita Valley Groundwater Sustainability Agency at the 2021 ACWA Fall Conference/ACWA Election Casting a Vote for Pam Tobin for ACWA President and Cathy Green for ACWA Vice President as Recommended by the ACWA Nominating Committee

Attachment

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# Members to Elect ACWA President, Vice President at Conference

The election to determine ACWA's President and Vice President for the 2022-'23 term is scheduled for Wednesday, Dec. 1, during ACWA's 2021 Fall Conference & Exhibition.

The ACWA Nominating Committee, headed by Chair Brent Hastey, has announced a slate that recommends current ACWA Vice President Pamela Tobin for ACWA President and current ACWA Region 10 Vice Chair Cathy Green for ACWA Vice President.

At its meeting on Sept. 24, the ACWA Board of Directors approved procedures whereby ACWA members will be able to participate and vote in person or virtually in the upcoming membership meeting and election. The in-person meeting will be held in Ballroom D-H of the Pasadena Convention Center. Virtual voting delegates will participate via Zoom. The session is scheduled to begin at noon.

Nominations from the floor will be accepted prior to the vote. ACWA Bylaws require that floor nominations and seconds be made by a member of the association and be supported by a resolution of the governing body of the member making and seconding such nomination. The member agency on whose board the nominee serves shall submit a resolution of support if they are not the agency making the floor nomination or second. The resolutions to facilitate floor nominations must be submitted to Clerk of the Board Donna Pangborn at donnap@acwa.com by close-of-business Wednesday, Nov. 24, 2021.

## About the Candidates

**Pamela Tobin** has been a member of the San Juan Water District Board of Directors since 2004, including three terms as Board President. She also has served multiple terms as Chair of both the Sacramento Regional Water Authority (RWA) and the Sacramento Groundwater Authority and was the recipient of RWA's 2018 Distinguished Service Award.

She was elected Vice President of ACWA in 2019 after serving as Chair of the Region 4 Board in 2018-'19. Tobin chairs the Leadership to Leadership initiative, a virtual meeting series designed especially for member agency leadership to discuss emerging local issues with ACWA's leadership. She is actively involved in ACWA's regions and committees and currently serves as a member of ACWA JPIA's Executive Committee.

Beyond her water industry involvement, Tobin works as a realtor and property developer with more than 30 years of experience as a business owner.

**Cathy Green** was elected to the Orange County Water District (OCWD) Board of Directors in 2010 and was re-elected in 2012, 2016 and 2020. She was selected by the Board to serve as its President in 2015 and 2016. She currently serves as 1st Vice President, a position she previously held in 2013, 2014 and 2020.

Green has been actively involved in ACWA's Region 10 and various committee activities for the past nine years. She has served on ACWA's Board of Directors as the Chair or Vice Chair of the Region 10 Board since 2016 and ACWA's Executive Committee since 2020. Green also currently serves on ACWA's Water Quality and Energy Committees.

Beyond her water industry involvement, Green is a registered nurse and holds a degree in law. She has been active in civic leadership, serving on the City of Huntington Beach City Council 2002-2010, serving as mayor in 2003 and 2009. Green is also the recipient of many local, statewide, and national awards.

## Voting Procedures

ACWA will be using a voting system called Live-Tally, which will allow voters to vote using a handheld keypad or online keypad (which can be accessed through any modern web browser on a computer, tablet or smart phone). **Voters must be present at the membership meeting, either in person or virtually, to vote.**

Member agencies must indicate their voting representative and alternate on the Voter Designation & Information Form. **The form must be submitted by Wednesday, Nov. 24.**

Members who desire to participate in the membership meeting virtually and vote electronically are required to sign and return the "Consent to Electronic Transmissions, Meetings & Voting Form" by Nov. 24, consistent with the California Corporations Code.

Additional information including candidate backgrounds, further election procedures, and the required voter designation & information form is available for members on the board election webpage at **www.acwa.com/boardelection**.

## Questions

Questions about the election should be directed to ACWA Clerk of the Board Donna Pangborn at (916) 441-4545.

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**ITEM NO. 4.4**

# Santa Clarita Valley Groundwater Sustainability Agency Board Memorandum

**DATE:** November 23, 2021

**TO:** SCV-GSA Board of Directors

**FROM:** SCV-GSA Staff

**SUBJECT:** Authorize Letter of Support for Santa Clarita Valley Water Agency's Saugus 3 & 4 Wells Project Grant Application

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## SUMMARY/DISCUSSION:

The Santa Clarita Valley Water Agency (SCV Water) is submitting a grant application under the Department of Water Resources Urban/Multi-Benefit Drought Funding Grant opportunity for its Saugus Wells 3 & 4 Wells Project (Project). The grant application process encourages solicitation of Project support from local stakeholder agencies, such as the SCV-GSA. A draft letter of support is attached for your consideration.

The Project will construct two wells which will collectively produce an estimated 6,450 acre-feet per year (AFY) of high quality drinking water consistent with SCV Water's strategy to increase local dry-year water supply reliability and reduce dry-year reliance on environmentally sensitive exports from the Sacramento-San Joaquin Delta delivered through the State Water Project (SWP). SCV Water's 2020 Urban Water Management Plan documents that new Saugus Formation Wells (including Saugus 3 & 4) need to be constructed to achieve the objective of reaching local dry year supplies of up to 35,000 AFY. The Saugus 3 & 4 Wells were analyzed as part of the operating plan included in the Santa Clarita Valley Groundwater Sustainability Plan.

## FINANCIAL CONSIDERATIONS:

None.

## RECOMMENDATION:

That the Board of Directors approve the attached letter in support of SCV Water's grant application for the Saugus Wells 3 & 4 Project.

Attachment

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SCV
GSA

**DRAFT**

November 23, 2021

California Department of Water Resources
Division of Regional Assistance, Financial Assistance Branch
715 P Street, 6th Floor, Mailbox 15
Sacramento, CA 94236-0001
Attn: Linda Woolridge

**RE: Letter of Support for the Santa Clarita Valley Water Agency's Saugus 3 & 4 Wells Project Application**

Dear Ms. Woolridge:

As the Board President, I am writing on behalf of the Santa Clarita Valley Groundwater Sustainability Agency (SCV-GSA), in strong support of the Santa Clarita Valley Water Agency's grant application for the 2021 Urban and Multi-benefit Drought Relief Funding for their Saugus 3 & 4 Project.

As the Groundwater Sustainability Agency (GSA) for the Santa Clara River Valley East Groundwater Subbasin located in Los Angeles County, California, our goal is to ensure the continued sustainability of our local groundwater resources and to promote projects that support this goal. The Saugus 3 & 4 Wells Project is in alignment with our GSA's priorities in developing sustainable groundwater supplies and management of our local groundwater resources.

The Santa Clarita Valley Water Agency's application for the Saugus 3 & 4 Wells Project to participate in the funding opportunity provided by the Department of Water Resources to increase drought resiliency measures demonstrates SCV Water's commitment to providing a sustainable and safe water supply by investing in groundwater water supply infrastructure.

On behalf of the Santa Clarita Valley Groundwater Sustainability Agency, please accept this letter of strong support for the Saugus 3 & 4 Wells Project and the continuing efforts of the Santa Clarita Valley Water Agency.

Sincerely,

Gina Natoli, Board President
Santa Clarita Valley Groundwater Sustainability Agency