

From: [Carl Werder](mailto:Carl.Werder@SASBGSP.com)
To: SASBGSP_Comments@KennedyJenks.com
Subject: Comments to GSP Draft
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Comments to GSP Draft

Section 1, -- This section offers nothing but a rehash of existing documentation concerning the GSP process, therefore no comment

Section 2. – Page 14 of 204, line 78, Table 2.1-2., Why is this document using 2018 Water Year and not 2019 or a better picture of distributed water would be a three year average.

Page 33 of 204, line 212., Recommend adding internet location for DWR so that the reader of this document can obtain additional information concerning their individual wells.

Page 36 of 204, line 242, Table 2.1-10., Each of these SCGA well locations are shown in hydrograph format so as to show how some areas have declining water tables and others that have improved water tables. The problems with this draft document is that on pages 35 and 36 there is no reference to Appendix 2-B Hydrographs and the hydrographs in Appendix 2-B do not show either the Local Designation or State Well Number. In fact there are 459 hydrographs in appendix 2-B numbered in order. This appendix needs to be divided up into groups so as to allow the reader of this document to find a specific well. This seems to me to be a case of putting out so much information (459 hydrographs) and poor referencing of hydrographs so that the declining well locations are buried.

Page 43 of 204, line 346, Table 2.1-13., This table for 2018 shows a total remediation groundwater extraction of 34,322 AF/yr and Aerojet alone extracting 26,075 AF/yr. However, on page 189 of 204, Table 2.4-7, remediation amount is only 21,000 AF/yr over a period of nine years and yet it goes up over a period from 1970. This makes no sense and appears to be deflecting the fact that remediation efforts contribute to reducing recharging of the groundwater in the Vineyard area.

Page 59 of 204, line 607., The words “small decline” are subjective and the word ‘small’ should be deleted as this is an opinion with no bases in fact.

Page 60 of 204, line 678, Table 2.1-17., This table uses an average but fails to show how many years to determine this average? Also, since this document shows numbers in Table 2.1-13 for 2018 why add additional numbers. It would be best to stay with either a year or a specified average throughout this GSP.

Page 60 of 204, line 705 and 706., The yield number of 273,000 AF/yr is a negotiated settlement amount that has no bases in fact. This was pointed out by DWR in their rejection of the SCGA Alternative. Therefore, I recommend that any reference to this number be deleted from this GSP.

Page 135 of 204, Figure 2.3-18., This hydrograph of wells 262 and 263 shows a steady decline in the groundwater table as a result of over pumping for remediation efforts and over reliance of groundwater in the Vineyard area. This decline must be clearly addressed as the current drop in the water table is not sustainable. Action needs to be clearly stated in this document as to how this decline will be stopped prior to any reporting to DWR. And how soon projects will be up and running to rectify this ongoing problem.

Page 203 of 204, Line 2936., Very disappointed that this section has yet to be completed. This is the

real meat of this section one. Everything else in this section one is just a repeat of existing documents providing nothing new to the reader. Please forward this section to me via email as soon as it becomes available.

Section 3 – Page 7 of 85, Lines 104 and 105., This sentence should include remediation as a major use of groundwater in the basin since they extract approximately 30,000 AF/yr.

Page 14 of 85, Line 363., Introduction of a new project called “Harvest Water Project ” without any explanation of what this is or maybe I missed it? Need to refer reader to Section 4.4.1 at this location.

Page 32 of 85, Line 791, Table 3-3., The 50th percentile column has figures carried out to the hundredths while all other columns are not. Recommend dropping the decimal point figures in this column.

Page 40, Line 852, Table 3-4., It is assumed that the ‘Well ID’ in this table is DWR’s, but again it would be better to add SCGA’s numbers to locate the hydrograph that goes with the information in the table.

Section 4 – Page 6 of 44, Line 64., Again the 273,000 AF is a red flag. By using the words, “development of a sustainable yield value of 273,000 AF” makes it sound as though this number was based on some criteria. It was not, it was simply negotiated between parties such as developers and environmental folks. Recommend deleting this part of the sentence.

Page 6 of 44, Lines 66 and 67., It should also be pointed out that the 2006 Groundwater Management Plan has in it action plans if the criteria is exceeded and in 15 years not once has any of these actions been taken.

Section 5 – No Comments at this time.

Section 6 – No comments.

General comment: Section 1 is currently 204 pages and more pages to be added. Other sections are less than 100 pages. Recommend dividing Section 1 into two parts or adding another section. Same for appendix 2-B, it is two big at 459 pages to be useful. May want to divide the basin into four or five areas of hydrographs.

Carl Werder 7/5/2021