

Commenting Organization	Comment By	Date of Comment	Section/Appendix #	PDF Page Number	PDF Line Number or Figure Number	Comment
Conservation Landowners	Barbara Evoy	7/9/2021	Executive Summary		OVERALL	The Executive Summary appears to be a shortened report rather than an Executive Summary. An Executive Summary should offer a layperson's synopsis of the key points and conclusions of the report. This 33 page "summary" includes way too much detail - for instance, a listing of every remediation site, and all water efforts in the last 20 years, is far too much detail that gets in the way of understanding the key findings. The Executive Summary should be reworked to communicate 1) the purpose of the report (SGMA compliance), 2) how the process and report addresses the SGMA components, 3) what the status of the subbasin's current condition is, 4) what the status will be with continuing climate change, and 5) what the key projects and management efforts are proposed to address.
	Barbara Evoy	7/9/2021	Executive Summary		OVERALL	The Executive Summary is needs to have a clear discussion on how climate change has been evaluated and included in the analysis . The is especially apparent when later report sections are discussed and the summary tables say simply "with" or "without" climate change. The reviewer has no clear idea of what these numbers could mean without some grounding of what was looked at. It is a topic that is touched on in several sections so an upfront layperson's discussion of the climate change analysis is needed.
	Barbara Evoy		Executive Summary		OVERALL	The Executive Summary very notably does not consistently mention non human users of water - this needs to be corrected and reviewed throughout the document.
	Barbara Evoy		Executive Summary		line 1	I would expect an Executive Summary to lead off with something more like "The responsible agencies for this Groundwater Sustainability Plan believe that an effective and efficient groundwater management plan is critical to the health and welfare of the people, environment and community of the basin. As such, the SCGA undertook a thorough and timely review of groundwater resources to address the key elements of SGMA. This review included comprehensive groundwater basin description, regional ground water modeling, climate change analysis, groundwater related ecosystem assessment....Our in-depth look at our groundwater resources and those dependent upon them, both humans and natural ecosystems, shows that the basin is currently..... and with climate change will be To ensure that our basin will be able to meet the challenge of climate change and the demands upon it over the next 20 years, the plan lays out potential projects, water quality and elevation monitoring systems and management actions....." "Public input to the development of the GSP was encouraged. As a result, the GSP also frames the next steps to add an additional layer of protection for shallow well owners through a well protection program...."
	Barbara Evoy		Executive Summary		line 1	Starting off the document with "Effective" sounds both inaccurate and defensive. The 2021 definition of gw management is defined by SGMA. The past regional efforts did not include all the components of SGMA. Subbasin GW levels were brought up in the last 20 years, but the GSP needs to focus on discussion on the current SGMA management construct-specific authority for subbasin management/oversight and including GDEs and ISWs. DWR mandated the GSP development for a reason.
	Barbara Evoy		Executive Summary		line 9	The list below is that of the document sections not the topics. I would think this would be better worded to include the required elements of SGMA and where they can be found in the document rather than the reverse. The reviewer is looking for those elements. I appreciate that DWR gave GSAs a format, but the reviewer needs a road map to where the actual SGMA topics are addressed. Section headings don't lead the public there easily.
	Barbara Evoy		Executive Summary		line 15	Line 15 "CoSANA model" is not going to be understandable to the lay person as a "topic".
	Barbara Evoy		Executive Summary		Line 52	GDEs and surface water interface ecosystems are very noticeably absent from this list. They need to be included.
	Barbara Evoy		Section 2		line 1105	As the 2020 UWMPs are now complete, this section needs to be updated to reflect the current numbers -both as they relate to targets and as updated real usage rates for the areas.
	Barbara Evoy		Section 2		Line 2407	As a new study has provided much deeper potential rooting depths (80 feet) , this section should be re-evaluated in light of the new work and additional modeling work done to estimate the extent of GDEs that could access this much deeper water. If it is not possible to incorporate the new study in this GSP, the implementation plan should include a technical review and monitoring schedule to revisit and address the issue before the next 5 year update. (same comment for discussion in Section 3, line 2409
	Barbara Evoy		Section 2		Lines 2411 and 2447	These recommendations to close data gaps need to be reflected in a clear way in the Implementation Section. There is no timeline provided to complete either these missing vertical gradient wells nor those needed on the Consumnes River . The GSAs need to be able to use the Implementation Plan to develop necessarily budgets to address the pieces.
	Barbara Evoy		Section 2		Line 2618	Again, these demand numbers need to be updated with the current 2020 UWMP data, not 2015 data

	Barbara Evoy		Section 2		OVERALL	This section is sorely lacking a clear discussion of climate change and how it is used in the projected values. Table 2.4-2 drops in the final column "Water Budget with Climate Change" with no introduction of how climate change was integrated, nor what range of values/extremes were selected. It is presented as a given value with no indications of how conservative the estimates are or what they entail. Given ongoing climate changes and continuing evidence of acceleration, there needs to be a clear understanding of what was used in the analysis. Without it, there is no way to understand the significance of the values. Section 2.4.2.4 includes a few sentences that mention (200 pages into the 204 page Basin Setting) that model inputs were adjusted using data developed for the American River Basin Study (Reclamation 2000). There is no discussion as to whether or not this study is reflective of current climate change research. (Does the modeling reflect the referenced work shown in Section 3, line 113 and 114?) Reclamation 2000 is not shown in the reference list. At a minimum, the central document link should be provided. The GSP discussion, however, needs to help the reader develop an understanding of one of the basic underlying concepts of the analysis. Without it, the tables are not meaningful.
	Barbara Evoy		Section 2		line 2857	remediation waterwater should be remediation wastewater
	Barbara Evoy		Section 3 Sustainable Management Criteria		OVERALL	Impacts to GDEs - as GDEs are one of the most sensitive users of gw, it appears the current indicators and triggers are not sufficiently protective enough of the resource. While well users can pay additional pumping costs or lower pumps and still get water, most GDE communities cannot be sustained with significant water level drops. Vegetation dies and doesn't revive with the addition of water years later. It is recommended that the criteria, thresholds, and monitoring relating to undesirable GDEs impacts be re-examined. These do not appear protective enough.
	Barbara Evoy		Section 3 Sustainable Management Criteria		line 538 and 567before January 1, 2015" and the assumption then that the MTs can be lower than January 1, 2015. Please explain another way. The way I interpret the code section is that no minimum threshold should be lower than January 1, 2015 as the base. Why is the starting expectation that you can go lower than January 1, 2015 with no significant impact? Likewise, I do not understand why the MTs (line 567) are set at levels post January 1, 2015 or the lowest gw level in the projected scenario with PMA and climate change, whichever is lower". This appears to place ISW and GDEs at greater risk. Please rephrase the logic in this section to make it clearer.
	Barbara Evoy		Section 3 Sustainable Management Criteria		Line 635	Again, a grounding of climate change assumptions is missing from the document. Please define "medium climate change warming scenario".
	Barbara Evoy		Section 3 Sustainable Management Criteria		Line 643	Here is the study is referenced as American River Basin Study (USBR, 2020). In the previous section the climate change model was listed as Reclamation 2000). Is this a different study or the same?
	Barbara Evoy		Section 3 Sustainable Management Criteria		Line 691	This sentence doesn't make sense. GDE and well protection technical memorandum are different.
			Section 4		line 68	This section needs a clear statement, of the most current modeling result's conclusion, in regard to an updated Sustainable Yield number. Talking about the pre-SGMA work does not reflect the significant expenditure of money and effort in refining this.
			Section 4		line 683	Demand reduction should be discussed and included as one of the strategies to insure basin sustainability. This is certainly the case if conservation is being considered as one avenue to achieve water savings.
	Barbara Evoy		Section 5: Plan Implementation		OVERALL	This section appears to be the one most in need of fleshing out. The plan isn't self implementing. There are very few specifics beyond the administrative and technical update processes, such as the necessary updating of technical and monitoring results, refreshed modeling, required annual reporting and 5 year review. "Coordination" is used frequently without any specifics of what is involved. There are very few specific target dates for action. While I can appreciate that many of the governance issues are still outstanding, there should at least be target dates for the review of the data gaps, reports back on costs, Prioritization of first implementation needs, a draft policy with Sacramento County on the revised well construction requirements, establishment of working groups to address specific issues (such as the shallow well protection program), a date for the draft of a regional water bank/accounting framework etc. There is very little to monitor management progress - which is an incredibly important part of the plan. There is also no discussion of how the GSAs will continue to update the public and involve the public in the ongoing progress reviews. This kind of thing is important in light of previous efforts to establish a well protection program. It was apparently of significant interest during the discussion of go management but fell off the radar over time and was never implemented or funded. There should be target dates and a process set to assure the public that this issues will indeed to address this time. As stated before, without specifics in the implementation plan, the GSA cannot plan yearly expenditures and staff time. Nor does it provide a solid reference point for grants that may be available to help with implementation. There needs to be clear intent, identification of responsible agencies/staff, and timeframe to solidify the actual implementation.
	Barbara Evoy		Section 5: Plan Implementation		Line 186	The GSP speaks to reporting but not the process that will be used if thresholds and triggers are exceeded. Submitting a report to the regulatory agencies does not address how the GSA will work to consider the annual information and take action if triggers are exceeded. There needs to be a process laid out in advance to show how quickly the information will be brought back to the GSAs and how the consideration will be handled. It won't be acceptable to have levels exceeded for multiple years, then several years to start to look at the problem and work out the process from there. Exceedence shown in annual monitoring need to be brought back to the GSAs for additional management oversight and discussion. Discussion and a framework of the specific steps and timeframes to address exceedences should be laid out in the document.
	Barbara Evoy		Section 5: Plan Implementation		Lines 254, 255, 257, 259, 263, 266	Please describe what "coordination" entails. Many times it is used to signify "notification" rather than an active process to work through specific issues. These are so general, it is impossible to say what exactly is expected, funded or happening. There is no responsibility, metric or feedback specified to know whether coordination is efficient or effective .
	Barbara Evoy		Section 5: Plan Implementation		Line 331	This really is a reiteration of SGMA requirements rather than an implementation plan. Interim milestones for the Well protection program, Sac County well standards, Water Bank framework rules, monitoring plan gap analysis etc. need to be include in the implementation plan. Again, this is important for both the GSAs to understand their roles and responsibilities as well as to budget for the activities. An adopted specific implementation plan could also provide a base for future grant funding opportunities.