



March 23, 2021

Via Email

Dear Chair Adcock and Members of the Board of Directors:

In reviewing the draft chapters of the GSP's for other subbasins, we see a recurring error, to which we objected in our [previous comments the 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan](#). The proposed minimum thresholds for groundwater levels and storage reduction fail to coordinate with, and support attainment of, the minimum thresholds for other sustainability indicators, especially the seawater intrusion indicator.

SGMA requires that *each* minimum threshold must avoid *each* undesirable result because it requires that “basin conditions at *each* minimum threshold will avoid undesirable results for *each* of the sustainability indicators.” (23 CCR § 354.28(b)(2), emphasis added.) For example, the groundwater level minimum threshold must be “supported by” the “[p]otential effects on *other* sustainability indicators.” (23 CCR 354.28(c)(1)(B), emphasis added.) This means that each minimum threshold, especially the groundwater level minimum threshold, must be coordinated to ensure that *all* undesirable results are avoided.

As we previously objected about the 180/400 Subbasin GSP:

- The minimum thresholds for groundwater levels and storage reduction are inconsistent with SGMA regulations because they fail to avoid the undesirable results for the seawater intrusion sustainability indicator.
- The minimum threshold for groundwater levels, set at one foot above lowest historical groundwater levels, will not support the minimum threshold for seawater intrusion, set at existing line of seawater intrusion advance, because those groundwater levels will not halt seawater intrusion.
- The minimum threshold for reduction in storage, set at the future long-term sustainable yield, will not support the minimum threshold for seawater intrusion, because halting seawater intrusion requires replacement of depleted groundwater storage by temporarily reducing extractions to below the sustainable yield.

History is repeating itself. For example, the [Eastside chapter 8](#) provides that future pumping may occur right up to the sustainable yield level. In admitting that “pumping at the minimum threshold may not, by itself, stop all seawater intrusion,” the discussion ignores the need to replace depleted storage to build back groundwater elevations that will hold seawater intrusion in check. The discussion also implies that the minimum threshold for storage reduction does not need “by itself” to stop seawater intrusion. This is not accurate: SGMA requires that *each* minimum threshold must avoid *each* undesirable result. (23 CCR § 354.28(b)(2).)

Regarding groundwater levels, the Eastside Chapter 8 says: "The groundwater elevation minimum thresholds are set at 2015 groundwater elevations, which is above historical lows. Therefore, the groundwater elevation minimum thresholds are intended to not exacerbate, and may help control, the rate of seawater intrusion." LandWatch doubts the 2015 groundwater levels were sufficiently high to prevent seawater intrusion, because seawater intrusion did in fact advance in 2015. We note the same general problem with the [Langley chapter 8](#). The Monterey subbasin chapter 8 is not out yet.

The discussion in these draft chapters relies on the expectation that some other magic bullet will stop seawater intrusion. The Eastside Chapter 8 claims, "The seawater intrusion minimum threshold does not depend on the change in storage minimum threshold: exceedance of both the change in storage and seawater intrusion minimum thresholds will be avoided independently." In short, the draft chapters depend on some kind of unknown, un-costed technology solution, not on managing pumping and reservoir operations to build back the groundwater levels. Furthermore, it is entirely unclear how the change in storage minimum threshold could possibly be avoided independent of the groundwater elevation minimum threshold because storage changes translate directly into changes in groundwater levels.

Even if the Seawater Intrusion Working Group is considering a \$100 million plus coastal well project to address seawater intrusion, setting the minimum thresholds in reliance on this unproven future project puts the cart before the horse. Minimum thresholds are supposed to be set before the GSA decides on management actions and projects intended to attain these thresholds. Setting the minimum threshold for groundwater elevations below the level needed to prevent seawater intrusion effectively commits the GSA to a technology solution and rules out potentially less costly management actions intended to elevate groundwater levels.

Furthermore, to meet the objective of halting seawater intrusion in the 180/400 Subbasin at 2017 levels and preventing it entirely in the Eastside Subbasin, it is clear that interim pumping reductions are necessary even if there is some long-term technology fix. The exclusive reliance on the "independent" technological solution is misplaced, because, whatever that solution looks like, it cannot be up and running for many years. In the interim, seawater *will* advance unless groundwater elevations are restored and then maintained by pumping reductions and reservoir operations. The minimum thresholds and the interim milestones should at least reflect the need for near term groundwater level increases pending implementation of a technological fix.

Another problem is that, while the minimum thresholds are supposed to reflect the best available science, the draft chapters fail to use the now available groundwater model to set the minimum thresholds for groundwater levels. Presumably, the model can determine the groundwater levels needed to prevent advances in seawater intrusion. However, the Eastside and Langley base their minimum thresholds for groundwater levels on certain water years without any evidence that these levels were preventing seawater intrusion.

Thank you for addressing these issues as you review the plans.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. DeLapa". The signature is written in a cursive style with a large, stylized initial "M".

Michael D. DeLapa
Executive Director